Court File No.

ONTARIO SUPERIOR COURT OF JUSTICE (Commercial List)

BETWEEN:

BANNERS BROKER INTERNATIONAL LIMITED and STELLAR POINT, INC., by their receiver MSI SPERGEL INC.

Plaintiffs

- and -

RAJIV DIXIT, KULDIP JOSUN, DIXIT HOLDINGS INC., DIXIT CONSORTIUM INC., DREAMSCAPE VENTURES LTD., WORLD WEB MEDIA INC., and REAL PROFIT LIMITED

Defendants

MOTION RECORD

VOLUME II OF II

(*Ex Parte* Motion for a *Mareva* Injunction)

May 30, 2016

CASSELS BROCK & BLACKWELL LLP 2100 Scotia Plaza 40 King Street West Toronto, ON M5H 3C2

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Lawyers for the Receiver

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Tab M

Court File No.: CV-14-10663-00CL

ONTARIO SUPERIOR COURT OF JUSTICE (Commercial List)

GV/Im

IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1992, c.27, s.2, AS AMENDED AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE ISLE OF MAN WITH RESPECT TO BANNERS BROKER INTERNATIONAL LIMITED APPLICATION OF MILES ANDREW BENHAM AND PAUL ROBERT APPLETON, IN THEIR CAPACITY AS JOINT LIQUIDATORS OF BANNERS BROKER INTERNATIONAL LIMITED, UNDER PART XIII OF THE BANKRUPTCY AND INSOLVENCY ACT (CROSS-BORDER INSOLVENCIES)

This is the Examination by Receiver of ROBERT JAMES PIRIE, taken at the offices of CASSELS BROCK & BLACKWELL LLP, Suite 2100, Scotia Plaza, 40 King Street West, Toronto, Ontario, on the 25th day of February, 2015.

A P P E A R A N C E S: DAVID S. WARD ERIN CRADDOCK LARRY ELLIS

- } -- for the Joint Liquidators
 } of Banners Broker
- } International Limited and
 the Court-Appointed

Receiver of certain Banners Broker Affiliated Entities

-- for Robert James Pirie

NOEL D. GERRY ALSO PRESENT: Gillian Goldblatt

Sheet 2 Page 2	Page 4
R. J. Pirie - 2	R. J. Pirie - 41And with me this morning is my colleague,2Erin Craddock, as well as Gillian Goldblatt, who is3a chartered accountant at the offices of msi Spergel4Inc., which is the Court-Appointed Receiver in5Canada. Just to get started, can you give me your6full name, please?7A. Robert James Pirie.84.Q. And, Mr. Pirie, what is your date of
PAGE NUMBER	 9 birth? 10 A. January 10th, 1981. 11 5. Q. And your current address? 12 A. It is 76 Liberty Street South, 13 Apartment 302, in Bowmanville, Ontario.
ROBERT JAMES PIRIE, swornExamination by Mr. Ward3 - 121Index of Exhibits117Index of Undertakings118Index of Under Advisements119	 14 6. Q. How long have you lived there for? 15 A. About five years. 16 7. Q. And am I correct that you are a 17 Canadian citizen? Okay, prior to receiving the 18 notice from the Receiver, were you aware that 19 Banners Broker and the Banners Broker companies were 20 in an insolvency proceeding?
Index of Refusals 120 Certificate 121	21A. Yes.228.Q. Can you just tell me how and when23did you discover that?24A. Chris Smith said that he was winding25up the company. And at the same time, some
Page 3 R. J. Pirie - 3 1 ROBERT JAMES PIRIE, sworn 2 EXAMINATION BY MR. WARD: 3 1. Q. Good morning, Mr. Pirie. 4 A. Good morning. 5 2. Q. My name is David Ward and I am 6 counsel for the Joint Liquidators of Banners Broker 7 International Limited. And I also act for the 8 Ontario Court-Appointed Receiver of a number of 9 companies, and I will just read them out to you, 10 because we may refer to them later on in the 11 examination, okay? 12 A. All right. 13 3. Q. So my firm is also counsel for the 14 Receiver of 208736 Ontario Limited, which has 15 operated as a company called Local Management 16 Services, for Parrot Marketing Inc., which is 17 operatedwhich is formerly 8264554 Canada Ltd., 18 for 2341630 Ontario Inc., for Stellar Point Inc., 19 which was formerly Banners Broker Limited, for Dixit 20 Holdings Inc., which was formerly 8163871 Canada 21 Limited, and in addition to that, we are	Page 5 R. J. Pirie - 5 1 affiliates tried to, I guess, contact Appleton to do 2 the same thing and then it justthat's kind of 3 what happened. 4 9. Q. Okay, so fair to say that Chris 5 Smith told you that he was winding up the company? 6 A. Yes. 7 10. Q. And when, approximately, was that, 8 if you can remember? 9 A. Maybe, like, June of 2014. I don't 10 remember specifically. 11 Q. Fair enough, I won't hold you to it. 12 Are you aware that there is also a police 13 investigation into the affairs of Banners Broker 14 A. Yes. 15 12. 16 A. Yes. 17 13. 13 Q. And the same question, how and when 14 A. Yes. 15 14. 17 13. 18 And when, approximately, if you can 19 A. That, through internet chatter. 20 A. I would say about the same time. <

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eet 3 Page 6	-	. Paq	
R. J. Pirie - 6		,	R. J. Pirie - 8
in, and thank you for coming in and meeting with us,	1		change to Hive.
because we understand that you had some sort of a		26	. Q. Okay, so justbefore the name
role with one of the Banners Broker entities	3		change, when you say "Parrot" are we speaking about
A. M'hmm.	4		Parrot Marketing?
Qperhaps it was Stellar Point.	5		A. Yes.
Vou know vou will lat us know	6	27	
You know, you will let us know. A. M'hmm.		<u> </u>	
			Limited; do you know?
. Q. And we will spend some time talking	8	00	A. No idea.
about whichever company that may be. But before we	9	28.	
go there, can you just tell me, in big picture	10		at Parrot Marketing?
terms, describe for us, please, what your	11		A. Parrot Marketing was a communi-
involvement was with the Banners Broker or the	12		cations specialist.
Parrot, or the Stellar Point businesses?	13	29.	
A. Okay, November 2012, is that right?	14		me the Parrot Marketing name changes. Like, I
I think so, November 2012, I was hired by Stellar	15		assume it changed to Hive Marketing, at some point?
Point as the executive assistant to the director of	16		A. Hive Digital.
human resources and training. I worked at Stellar	117	30.	
Point in Whitby until September of 2013. At that	18		Digital?
time, Stellar Point was terminating most of its	19		A. We talked about it in about November
employees and I was contactedI was told through	20		2014. As to when the actual corporate name change
Raj Dixit that Chris Smith wanted me to come work	21		and forms and all of that, I don't know.
downtown for Parrot.	22	31.	
So I did so, and I was a communications	23	01.	communications specialist at Hive Digital?
so i ulu su, anu i was a communications enceipliet under the neoudenym. Ren Andersen	23		A. I changed positions slightly, I am
specialist under the pseudonym, Ron Anderson.	25		
Q. And before we get into that, have	20		nowI take care of project management and account
re 7	1 [] [Page	
R. J. Pirie - 7			R. J. Pirie - 9
you met with anyone else in an official capacity	1		management.
regarding the affairs of Mr. Smith and Banners? For	23	32.	Q. At Hive Digital?
instance, did you meet with the Competition Bureau?	3		A. Yes.
A. No.	4	33.	Q. Were there any other name changes
. Q. Did you meet with the police?	5		apart from the name change to Hive Digital?
A. No.	6		A. Not that I know of.
. Q. Does Mr. Smith know that you are	7	34.	Q. And did you have any other titles,
coming here today?			apart from communications specialist and project
A. Yes.	8		management and risk management?
. Q. When was the last time you spoke	10		A. Not risk management, account
with Mr. Smith?	11		management.
		05	

13

with Mr. A. Thursday. Now, you mentioned that Stellar Q.

Sheet 3

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22.

23.

14 Point was winding down in September of 2013, and I 15 just want to put, if we can, some timelines around when you moved to Parrot. So when did you work at 16 17 Parrot? What was the time period that you worked at 18 Parrot? 19 From September 20, '13 and on. A. 20 24. Q. Until when? 21 Technically, I am still working for A. 22 23 24 25 Chris. 25. 37. Q. So you are still working at Parrot? A. I am not quite sure what we are

operating as right now, but there has been a name

35. Q. Account management, I'm sorry. A. I am fairly fluent, so I have had a couple different names. Whatever needed to be done at the time. I don't have a hard skill set, like a programmer or a graphic designer, so I just... Q. What were those...and I will just 36. make a list, if you can recall. What were your job titles at Parrot?

So, communications specialist,

are the three that come to mind.

Yes.

A.

Q.

38.

project logistics coordinator and account manager,

Q. Now, were these full-time positions?

And when you say "came downtown to

	She	et 4 Page 10		. Page	- 397
	Sue	R. J. Pirie - 10			R. J. Pirie - 12
1		work in Parrot Marketing", what offices were you	1		approximately October 2011 and June 2012?
		work in a rot warketing, what onces were you			
2		working at?	23		A. That seems about right. I was in
3		A. 167 Church Street.		- 4	school at the time.
4	39.		4 5 6	51.	
5		A. Yes. I am now at 1376 Bayview, I	5		Marketing as a communications specialist, that was,
6		believe.	6		after you left Extreme Pita, you became a
7	40.	Q. Do you recall when you moved to 1376	7		communications specialist at Parrot Marketing?
8		Bayview?	8		A. No, I went to Stellar Point.
9		A. August 2014.	9	52.	
10	41.		10	011	Point as the executive assistant to the director of
11	41.	spoke to Mr. Rajiv Dixit, if you recall?	111		human resources and training.
		Spoke to win. hajiv Dixit, ii you recain:	12		A. Correct.
12		A. I saw him at a Dairy Queen in, I		50	
13		guess it would have been May of 2014. And then	13	53.	
14 15		previous to that, when I left Stellar Point.	14		experience or educational experience that was
15	42.		15		relevant to your job at
16		A. I have never met the man.	16		MR. GERRY: How is this relevant,
17	43.	Q. Have you ever spoken with him?	17		Counsel, to the scope of this examination?
18		A. No.	18	54.	MR. WARD: Well, the allegation, I
19	44.		19		guess, is that these companies were a
20		A. I have heard the name. I know he	20		fraudulent, criminal Ponzi scheme and that
21		was involved in the beginning and then left. That	21		the people that operated them weren't
20			22		qualified to operate them and that they
22 23	15	was before my time.	23		yuameu to operate them and that they
23	45.		20		wereand we would like to investigate
24		about your background, then, and then we can, I	124		whether or not this gentleman brought
		i na li dina la francessa da la companya da companya	llor		
25		suppose, talk a little bit about Parrot, in	24 25		in any experience to these job
	Page	• 11	25	Page	in any experience to these job
L	Page	R. J. Pirie - 11	25	Page	in any experience to these job R. J. Pirie - 13
1	2age	R. J. Pirie - 11 Particular. Because I take it that you never worked	1	Page	in any experience to these job R. J. Pirie - 13 responsibilities.
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1 2 3 4	Page	R. J. Pirie - 11 Particular. Because I take it that you never worked for an entity by the name of Banners Broker, you were A. Correct, I was always with Parrot	1 2 3 4	Page	in any experience to these job R. J. Pirie - 13 responsibilities. MR. GERRY: Okay, so we are here for you to determine whether or not it was a fraudulent Ponzi scheme, is that the scope
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,	Sheet			Page 16
		R. J. Pirie - 14		R. J. Pirie - 16
1		provided earlier, before this, if that was	11 1	to worry about the purpose of the question,
2		relevant to this examination?	12	but just consider the question, okay? It
3	58.	MR. WARD: Well, I don't know that the	23	is not the Receiver's conclusion that there
	50.			
4		affidavits, per se, are. They have been	4 5	is a fraudulent pyramid or Ponzi scheme.
5		available on the Receiver's website, so,		That is not what we have concluded. And,
6		presumably, you would have looked at that	6	in fact, we have no idea whether or not it
		in the course of preparing your client for		was, which is what I am hoping Mr. Pirie
8		today.	8	can help us with today. And it would
9		MR. GERRY: No, I didn't look at those.	9	assist us in understanding the trade, the
10		I would expect you to have provided them.	10	dealings and the property of Stellar Point,
11	59.	MR. WARD: Well, we didn't. Oh, they	11	if we can know whether Mr. Pirie had some
12		were provided to your client.	12	qualifications that would be relevant to
13		THE WITNESS: They were?	13	the responsibilities that he assumed.
14	60.	MR. WARD: I am told that the copies of	14	MR. GERRY: I am going to stick to the
15		the affidavit materials were provided to	15	refusal, Counsel.
16		your client.	16	
17		MR. GERRY: In what manner?	17	BY MR. WARD:
18	61.	MR. WARD: We understand, they were	18	65. Q. So I would like to dial back to
19	011	delivered. Listen, you are welcome to take	19	November of 2012, when you indicated you were hired
20		a break and look at them now, but I	20	by Stellar Point, okay?
20 21		thinkyou can understand why, whether or	21	A. Okay.
22		notyou can also decline to answer the	22	66. Q. Can you describe for us how it was
22 23			23	you came to be hired by Stellar Point?
20		question, whether he had anyI don't know	23	
24 25		if it would serve the witness well, but if you want to decline to answer any questions	24	A. I knew the director from previous work. He interviewed me because of my skill sets.
25			120	
	Page 1	5		Page 17
	Page 1	5 R. J. Pirie - 15	4	Page 17 R. J. Pirie - 17
1	Page 1	5 R. J. Pirie - 15 having to do with his educational or prior	1	R. J. Pirie - 17 R. J. Pirie - 17 I went through the entire vetting process of the
1 2	Page 1	R. J. Pirie - 15 having to do with his educational or prior work experience prior to Stellar Point, we	1	R. J. Pirie - 17 R. J. Pirie - 17 I went through the entire vetting process of the interview. He basically said he will give me the
3	Page 1	R. J. Pirie - 15 having to do with his educational or prior work experience prior to Stellar Point, we can accept that as a refusal.	1 2 3	R. J. Pirie - 17 R. J. Pirie - 17 I went through the entire vetting process of the interview. He basically said he will give me the interview, but to get the job I would have to prove
3		R. J. Pirie - 15 R. J. Pirie - 15 having to do with his educational or prior work experience prior to Stellar Point, we can accept that as a refusal. MR. GERRY: It's a refusal. /R	1 2 3 4	R. J. Pirie - 17 R. J. Pirie - 17 I went through the entire vetting process of the interview. He basically said he will give me the interview, but to get the job I would have to prove myself. So I like to think that I did better than
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	Sheet 6 Page 18		Page 20
	R. J. Pirie - 18		R. J. Pirie - 20
1	73. Q. Anybody else?	1	84. Q. Apart from that, are there any other
2	A. Not to my recollection.	2	changes to your terms of the nature of your
2	74. Q. And when you were hired, what were	3	employment?
4	the terms of your contract of employment?	4	Á. I did get a raise at one point, I
5	A. Forty hours. I started at 36K per	5	believe I had two raises, that aren't part of this.
	year. Went up to 40, after three months.	6	85. Q. Okay, and just in terms of
67	75. Q. And did it remain constant, beyond	7	compensation, then, the paragraph 3 of this
8	that, or did it change again?	8	agreement says you are at \$46,000. You had
9	A. I think it was constant. I don't	9	indicated earlier that you started off at 40, and
10	remember receiving anything that changed that.	110	that was
11	76. Q. And so do I take it that today, as	111	A. Stellar Point.
12	an employee of the successor, or the newly named	12	86. Q. So please describe the raises for
13	Hive Digital your compensation is still 40,000 per	13	me.
14	year?	14	A. I got one in December of 2013, and
15	A. My compensation is 46, I would my	15	one in May of 2014.
16	Parrot Marketing contract.	16	87. Q. And how much were they?
17	77. Q. So this is the contract that is in	17	A. 5,000 each.
18	effect right now?	18	88. Q. So it went to 51 and then 56?
19	A. I believe so. Again, I was hired to	19	A. Yes.
20	write blogs and talk to people. I don't worry too	20	89. Q. Did your responsibilities change
21	much about this sort of stuff.	21	over that time period?
21 22	78. Q. Can I have a look at that, please?	22	A. The one in December was after my
23	Thanks.	23	three-month probation. And the one in May was
24	MR. GERRY: I need a copy of that,	24	because I took on some additional writing
24 25	Counsel.	25	responsibilities.
	Page 19		Page 21
	R. J. Pirie - 19]	Page 21 R. J. Pirie - 21
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	Sheet 8 Page 26 R. J. Pirie - 26		R. J. Pirie - 28
1	webinars.	1	that Stellar Point wound down in September 2013?
2	A. M'hmm.	2	A. No. I assume they ran out of money,
3	116. Q. I think this is in the summer of	3	mismanagement.
4	2014.	4	127. Q. Okay.
5	A. M'hmm, that is when I was	5	A. Raj spent a lot of money on upgrades
6	117. Q. When you had moved, I guess, to		to the building where we were.
7	Parrot?	6	128. Q. The Whitby property?
8	A. Probably, yes.	8	A. Yes.
9	118. Q. But during this period that we are	9	129. Q. What sort of upgrades were they?
10	talking about now, while you were at Stellar Point,	10	A. How much time do you have?
10 11	do you know if there were any notes taken or	111	130. Q. Well, yes, I mean, we have gotI
10	transcriptions of those webinars or recordings of	12	don't want to waste anyone's time, but if there's
12 13	those webinars? Were they archived in any way?	13	anything that you think that the Receiver might be
14	A. They may have been. I know I	14	interested in.
15	recorded them at the time.	15	A. No, it'sthe front lobby hadwas
16	119. Q. Right.	16	gorgeous. There was a huge granite waterfall with
17	A. And then I would upload them to the	17	the name "Stellar Point" in it.
18	A. And then I would upload them to the	18	131. Q. Right.
19	company server, and what happened to them from there, I don't know.	19	A. There were lots and lots of big TVs.
		20	Raj's office was palatial, I guess, is the best word
20	120. Q. So they weren't live webinars, then,	20	that I can come up with. I could come up with a lot
21	or were they?		of words.
22	A. No, they were live.	22	132. Q. Okay.
20 21 22 23 24 25	121. Q. Live, okay. So when you say	21 22 23 24 25	A. And then the rest of the office was
24	recorded, they are A. Recorded during the webinar and	24	bare concrete floors and cubicles and bad lighting
23			
L			
	Page 27		Page 29
	R. J. Pirie - 27		Page 29 R. J. Pirie - 29
1	R. J. Pirie - 27 R. J. Pirie - 27 archived.		R. J. Pirie - 29 R. J. Pirie - 29 and bad heating.
1 2 3	R. J. Pirie - 27 R. J. Pirie - 27 archived. 122. Q. I see, got it. You have also	1 2	R. J. Pirie - 29 R. J. Pirie - 29 and bad heating. 133. Q. Right. And that building was sold,
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 Page 27 R. J. Pirie - 27 archived. 122. Q. I see, got it. You have also mentioned, I thinkyou mentioned something about Ron Anderson, which I believe was what? Who was Ron Anderson? A. Ron Andersontechnically, Ron Anderson was the communications specialist for Banners Broker. 123. Q. You say "technically, he was", why did you qualify by that? A. Well, because he was a pseudonym that I assumed because there was a lot of negative press on the internet. So it was Chris Smith's idea to try to protect my identity, because of my family and my other creative endeavours. 124. Q. Okay. Now, we will talk about that in a bit, but I don't want to get there until we are at theI am trying to do this chronologically. A. Okay. 125. Q. And I think we are still at the Stellar Point stage. When, in relation to that, did you assume the pseudonym of Ron Anderson? 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Page 29 R. J. Pirie - 29 and bad heating. 133. Q. Right. And that building was sold, at some point, as well. Are you aware that it was A. I assumed it was. I have gone past there and I have seen a new name on it. 134. Q. Just in terms of your days at Stellar Point and, in fairness to everyone around the table, the objective here is obviously to try to identify assets that we think should come within the receivership. And the receivership applies primarily to companies, that long list of companies thatit includes Stellar Point. But in terms of this time period at Stellar Point, is there anything else you think that we should know in terms of what Mr. Dixit or Mr. D'Eall may have taken from the company or ways that they spent money or not, that would be relevant to A. They may have. In the list of there are only three or four directors, but Grant was the lowest. 135. Q. Right.

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Page 32 Sheet 9 Page 30 R. J. Pirie - 30 R. J. Pirie - 32 and, I think, that you indicated that Chris Smith 1 Right, okay. 136. Q. 1 2 2 A. So there were trips. They were invited you to work downtown for Parrot Marketing? 3 called "BB World Tours", where the team would 3 A. Correct. Q. As a communications specialist? 4 go...the Stellar Point team would go, as well, to 4 147. 5 Yes. 5 wherever the trips were in Europe. And, I don't A. 6 know, Raj had some nice-looking watches and some 148. Q. So just describe for us, please, how 6 that came about? Did he call you? How did you 7 7 expensive alcohol in his office. 8 actually get invited to work downtown. What did you 8 Q. Right, and a service car? 137. do when you got there? 9 9 A. He had a Mercedes that was a 10 10 A. So, as the ... as people were being business car. terminated, I had a couple of people tell me, some Q. Right. 138. 11 11 12 A. Business vehicle. 12 of my bosses and some of the other directors, that 13 13 they knew that most of the things that came out of 139. Q. I do want to talk about the World 14 Grant's office were my work. So I had been 14 Tours a little bit, because I know, my understanding 15 15 recognized by the bosses that I did good work. And is that it's something that continued throughout the then as Raj was getting ready to let go of everyone, 16 16 entire Banners Broker existence. And there were he called me into his office and said that...like, 17 17 conventions and mini-conventions... 18 apparently, I didn't know Chris very well. Up to A. M'hmm. 18 19 Q. Is that the same as a World Tour, or 19 this point, I had met him a few times. 140. 20 20 149. Q. Right. is there a distinction there? 21 21 A. In name. There were a couple of A. But he had heard of my work ethic 22 and, I guess, my deliverables and he wanted me to 22 trips that weren't World Tours but most of the team 23 come work downtown. 23 went. And then there were a couple that were 24 24 150. Q. Okay, and then what happened next? officially World Tours. 25 Was there an interview with Chris Smith, or did you 25 Q. Right, and which of the ones did you 141. Page 33 _____ Page 31 _____ R. J. Pirie - 33 R. J. Pirie - 31 1 participate in, like travel along with them and just...one day you moved downtown? 1 2 2 actually witness? A. I don't think there was an 3 3 interview. Maybe there was an unofficial one, but A. At Stellar Point, none of them. basically, I went downtown to train some of the team 4 5 Q. Just before we close off on Stellar 4 142. 5 Point, is there anything else that stands out in in the downtown office. So the Monday, Tuesday I your mind as significant? Things that an 6 worked for Stellar Point and the Wednesday, 6 7 7 investigating Receiver into the business of Stellar Thursday, Friday I worked for Parrot Marketing. 8 Point or Banners Broker would like to know during 8 151. Q. Okay. So there was a transition 9 period then Stellar Point closed and you were full-9 this time period prior to the transformation into 10 time at Parrot? Parrot? 10 A. Yes. 11 A. The only thing I can think of is Raj 111 12 12 152. Q. And during the transition phase was liked money and he liked to spend money. 13 13 it 167 Church Street? Q. Right. 143. A. Yes. 14 So how he spent that...like, I have 14 A. 15 15 153. Q. And I think it's like a series of mentioned his office and the lobby, but I didn't 16 apartments or condos? 16 spend any time with the man. 17 17 A. It's a series of suites. They are 144. Q. Right. 18 supposed to be condos, but there were...we saw other 18 A. I didn't have to, he was kind of a 19 19 jerk. people operating similar to the way we were, one 20 21 22 23 24 20 21 22 23 24 145. actually right across the hall from us. Q. Sure. Q. What was the reporting structure So what he did with the money, I 154. A. when you moved down to 167 Church Street, was don't know. Mr. D'Éall still in the picture or Mr. Dixit? 146. Q. Okay, so let's move on then and we A. No, Mr. D'Eall had been moved down will talk about...just to put a frame around it, we 25 25 to the Belize office, to oversee down there and I will talk about the time period when you left Whitby

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	Sheet 10 Page 34		Page 36 4 () 5
	R. J. Pirie - 34		R. J. Pirie - 36
1	reported directly to Chris.		kind of handled all of the non-technical stuff.
2	155. Q. And what were your responsibilities	2	164. Q. Sure.
3	during this period, what did you do?	3	A. But I don't, to my best
4	A. Training and writing.	4	recollection, remember contacting people and saying,
5	156. Q. Writing	5	"You can't post this."
6	A. Blogs, training materials,	6	165. Q. Now, when you say "compliance
17	articles. Do some social media, some tweeting, some	1 7	department", was there actually a person that was in
l o	Facebooking.	8	charge of the compliance department, and people that
8		9	
19	157. Q. Okay.		worked under him or her?
10	A. Basically, I was supposed to be the	10	A. At Stellar Point, yes.
11	soft side to the technical side that there lots of	11	166. Q. Okay, and who was in charge of it at
12	people to do.	12	Stellar Point?
13	158. Q. And how about the training side of	13	A. I would rather not say, because they
14	things? What were you doing on the training side?	14	are not mentioned in here and
15	A. At that point, updating training	15	167. Q. In where?
16	manuals, as changes came down. I was supposed to	16	A. In any of these documents.
17		117	Λ . In any of mese documents.
	train the team in Toronto, but that never actually		168. Q. Okay, well, let'sI will make the
18	happened.	18	request and we can perhaps deal with that off the
19	159. Q. And were you doing webinars in	19	record and stuff. We would like to know
20	addition to that?	20	A. I can say David Hooker oversaw that.
21	A. I don't think I was doing them at	21	169. Q. Okay.
22	that point. I think that may have started later.	22	A. That, I can say comfortably.
23	160. Q. Okay, fair enough, yes, that's	23	170. Q. And he is in these documents, by the
24	right.	24	Way.
22 23 24 25	A. It's all kind of a blur.	24 25	A. Yes.
20			
	Page 35	7	Page 37
4	R. J. Pirie - 35	4	R. J. Pirie - 37
	161. Q. Now, we are interested in the social		171. Q. Okay. So we are back to 167 Jarvis
1 11			
2	media aspect of this, because what we have heard is	2	(sic) Street.
3	that Banners Broker would monitor the social media	23	(sic) Street. A. Church.
3	that Banners Broker would monitor the social media and the negative comments would beanything that	3	(sic) Street. A. Church.
3	that Banners Broker would monitor the social media and the negative comments would beanything that	2 3 4 5	(sic) Street. A. Church. 172. Q. Church, and you were there up until August 2014?
3 4 5	that Banners Broker would monitor the social media and the negative comments would beanything that was negative, would be strictly controlled and	3 4 5	(sic) Street. A. Church. 172. Q. Church, and you were there up until August 2014?
3 4 5 6	that Banners Broker would monitor the social media and the negative comments would beanything that was negative, would be strictly controlled and deleted, and they were creating positive postings on	3 4 5 6	(sic) Street. A. Church. 172. Q. Church, and you were there up until August 2014? A. Yes.
3 4 5 6 7	that Banners Broker would monitor the social media and the negative comments would beanything that was negative, would be strictly controlled and deleted, and they were creating positive postings on social media. Do you know anything about that, or	3 4 5 6 7	(sic) Street. A. Church. 172. Q. Church, and you were there up until August 2014? A. Yes. 173. Q. And then you moved to 1376 Bayview
3 4 5 6 7 8	that Banners Broker would monitor the social media and the negative comments would beanything that was negative, would be strictly controlled and deleted, and they were creating positive postings on social media. Do you know anything about that, or did that happen, are you in a position to say?	3 4 5 6 7 8	(sic) Street. A. Church. 172. Q. Church, and you were there up until August 2014? A. Yes. 173. Q. And then you moved to 1376 Bayview Avenue?
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Sheet 11 Page 36 R. J. Pirie - 38 1 177. Q. And during this period, prior to 2 2 August 2014, while at Parrot, did you travel at all 3 3 with Banners Broker? 5 4 A. Yes, Itravelled with Parrot. 5 5 178. Q. With Parrot. 6 6 A. Ithink in that time 7 7 179. Q. And, sorry, just before I get there, 8 9 essentially assume the role, the support role that 10 10 Stellar Point had prior to that? 11 11 A. Prety much. And a lot of that fell 10 12 to me. 11 180. Q. Did Parrot, to your knowledge, have 11 essentially when you moved to Bayview, when 181 Q. Were you involved in those other 12 182. Q. Do you know whether Banners Broker? A. At the end of the month. At the end 182. Q. Do you know whether Banners Broker? A. All was told is Chris wanted us to 182. Q. Do you know whether Banners Broker? A. All was told is Chris wanted us to 183. Q. So, sorry, going back to travelling A. Liring osme copy for a website or something, I	w So s is did your ot nom, ng up at sed."
1 177. Q. And during this period, prior to 1 still working at Parrot, presumably, and we know that Banners Broker, as a company, went into 2 August 2014, while at Parrot, did you travel at all 3 that Banners Broker, as a company, went into 3 with Banners Broker? 3 liquidation in March of 2014, I believe. Is that 4 A. Yes, I travelled with Parrot. 5 A. In March? 6 A. Ithink in that time 6 191. Q. February, it was February the 26th 7 179. Q. And, sorry, just before I get there, 8 192. Q. They went into liquidation in the 9 essentially assume the role, the support role that 10 Stellar Point had prior to that? 8 192. Q. They went into liquidation in the 10 Stellar Point had prior to that? 10 using August 2014 as a start date, because this 11 to me. 12 to me. 12 12 12 to me. 12 Stell and the month. At the end 15 6 August. 13 180. Q. Did Parrot, to your knowledge, have 16 193. Q. And what were you told, and by w 181. Q. Do yo	w So s is did your ot nom, ng up at sed."
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25 would help with that, but 25 A. Sure. Page 39 R. J. Pirie - 39 R. J. Pirie - 39 1 183. Q. So, sorry, going back to travelling 1 196. Q. And would people beI don't know 2 with the Parrot team during this period, prior to 2 but were people contacting you, the affiliates from	-10
Page 39 Page 41 R. J. Pirie - 39 R. J. Pirie - 39 1 183. Q. So, sorry, going back to travelling 2 with the Parrot team during this period, prior to 1 196. Q. And would people beI don't know	a?
R. J. Pirie - 39 1 183. Q. So, sorry, going back to travelling 2 with the Parrot team during this period, prior to 1 196. Q. And would people beI don't know 2 but were people contacting you, the affiliates fro	
R. J. Pirie - 39 1 183. Q. So, sorry, going back to travelling 2 with the Parrot team during this period, prior to 2 but were people contacting you, the affiliates from the people contacting you affiliates from	
1 183. Q. So, sorry, going back to travelling 1 196. Q. And would people beI don't know 2 with the Parrot team during this period, prior to 2 but were people contacting you, the affiliates from the people contacting you, the people contacting you with the people contacting you withe people contacting you withe people contacting you w	.1
2 with the Parrot team during this period, prior to 2 but were people contacting you, the affiliates fro	
2 with the Parrot team during this period, prior to 2 but were people contacting you, the attiliates tro	,
1.3 Bawiew just what were the conventions that you 11.3 around the world and asking	10
I Dayyow, just what were the conventions that you I o alound the world and asking	
4 attended at? 4 A. They tried.	
5 A. I went to one convention in 5 197. Q. And what happened, how did that	10?
6 Trinidad, which was in July. 6 A. I had to repeat that the site is	,
7 184. Q. 2014? 7 temporarily closed. I was told by Chris not to sa	N I
8 A. Yes. 8 anything else. And they bugged me to try to ge	
9 185. Q. Anything else? 9 some extra information from me, and that's all I	
10 A. I went to Belize three times. 10 could say.	
11 186. Q. Okay, for conventions, as well? [11 198. Q. And later on, was there more that	
12 A. No, that was to meet with the CSRs 12 you could say, or is that the way that it ended?	
14 187. Q. And the Belizean entity, was that 14 199. Q. Okay.	
15 Monetize Group Inc., or was it 15 A. That's the last I did.	
16 A. No idea. 16 200. Q. And what did you do after that,	
17 188. Q. You don't, okay. [17 because you are still at Parrot, although we kno	N, I
18 A. Again, I went down there to help [18 even later on in November, it's renamed Hive	·
20 details of the program.	
21189.Q. Any other travels during this21201.Q. But what were your responsibilities22period, apart from Belize and Trinidad?22at Parrot after you stopped doing Banners Broke	
22 period, apart from Belize and Trinidad? 22 at Parrot after you stopped doing Banners Broke	
23 A. Not to the best of my knowledge. 23 related work?	·r-
24 190. Q. So let's just move forward, then 24 A. Well, that wasagain, I had to	!r-
25 the office moves to 1376 Bayview Avenue. You are 25 dobecause my specific responsibilities were d	۱۲-

	Sheet 12 Page 42		Page 44
	R. J. Pirie - 42		R. J. Pirie - 44
1	with Banners Broker, I just kind of helped out	1	had a bookkeeper?
0	wherever Leauld Se writing articles for some	2	A. I have no idea.
2	wherever I could. So, writing articles for some		
3	sites that were owned by Chris, writing copy for	3	213. Q. Or an accountant?
4	sites, helping with social media.	4	A. I have no idea. I assume so. I
5	202. Q. I mean, when you say "sites",	5	hope so.
6	because, I mean, the Receiver's mandate, just so we	6	214. Q. In terms of theI mean, presumably
7	are clear, does extend to Parrot. What was the non-	7	you wereyou can tell me if whether or not it's
8	Banners Broker-related business of Parrot, from and	8	the case, but were you doing writing and promotion
		9	for these other sites?
9	after August 2014? What were the sites? Please	110	
10	give us some names.	10	A. In some cases.
11	A. We had what we called the Pubsite	11	215. Q. In which cases were you doing
12	Network, which was a series of 60 WordPress sites	12	writing and promotion for these other sites?
13	that had been created, that we were trying to	13	A. I think I wrote some copy for Shed
14	monetize, which never happened.	14	Pounds. I think I did some social media stuff
15	203. Q. Did you say "WordPress"?	15	forI can't remember. I don't know, it waswith
		16	
16	A. Yes.		the loss of BB, everyone else had jobs to do, so l
17	204. Q. Okay, go on.	17	was just to kind of help out.
18	A. We had a program called Create My	18	216. Q. Right. Was there any training to be
19	Suite, which was a graphic design template site, so	19	done at this point?
20	that people could do their own branding and logos.	20	A. Training of whom?
21	We had a program called Shed Pounds, which was	21	217. Q. Anybody.
22	supposed to be a weight loss hub. We had List 121,	22	A. Not to the best of my knowledge.
22	which was going to be kind of a rotail marketalage	23	
23	which was going to be kind of a retail marketplace		
24	for people to create their own digital content and	24	are continuing to work at Parrot/Hive, you are
25	other people to sell it. Those were the big ones.	25	helping out with social media presence?
	Page 43	7	Page 45
	R. J. Pirie - 43		R. J. Pirie - 45
1	205. Q. Any other ones? I mean, it sounds	11	A. Trying to.
2	like there are a lot that	2	219. Q. And writing?
3	A. Those are the bigthose are the	3	A. Yes. Less and less of that now.
4	ones that come to mind right now.	4	Now I am trying to do some project management. But
5			
	206 () Voe and was Chrie Smith running		
	206. Q. Yes, and was Chris Smith running	5	we don't have very many projects, so
6	Parrot at this point in time?	56	we don't have very many projects, so 220. Q. When you say "project management",
6 7	Parrot at this point in time? A. I assume so.	5 6 7	we don't have very many projects, so 220. Q. When you say "project management", what does that mean?
6 7 8	Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during	5 6 7 8	we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to
6 7	Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during	5 6 7 8 9	we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just
6 7 8 9	Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period?	5 6 7 8	we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just
6 7 8 9 10	Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris.	5 6 7 8 9 10	we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done,
6 7 8 9 10 11	Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite	5 6 7 8 9 10 11	we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done.
6 7 8 9 10 11 12	Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List	5 6 7 8 9 10 11 12	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith?
6 7 8 9 10 11 12 13	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were 	5 6 7 8 9 10 11 12 13	 we don't have very many projects, so Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes.
6 7 9 10 11 12 13 14	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? 	5 6 7 8 9 10 11 12 13 14	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right
6 7 8 9 10 11 12 13 14 15	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? A. They may have been. I don't know. 	5 6 7 8 9 10 11 12 13 14 15	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right now, of the newof Hive?
6 7 8 9 10 11 12 13 14 15 16	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? A. They may have been. I don't know. 209. Q. How big was the operation in terms 	5 6 7 8 9 10 11 12 13 14 15 16	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right now, of the newof Hive? A. We do have some, now, external
6 7 8 9 10 11 12 13 14 15 16 17	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? A. They may have been. I don't know. 209. Q. How big was the operation in terms of numbers of people that were working at Bayview? 	5 6 7 8 9 10 11 12 13 14 15 16 17	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right now, of the newof Hive? A. We do have some, now, external clients, that we are trying to do some work for.
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6 7 8 9 10 11 12 13 14 15 16 17 18 19	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? A. They may have been. I don't know. 209. Q. How big was the operation in terms of numbers of people that were working at Bayview? A. We were about 30 people. 210. Q. Now, you reported directly to 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right now, of the newof Hive? A. We do have some, now, external clients, that we are trying to do some work for. And then some of the, still, interior ideas that we have had, trying to get them out the door.
6 7 8 9 10 11 12 13 14 15 16 17 18 19	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? A. They may have been. I don't know. 209. Q. How big was the operation in terms of numbers of people that were working at Bayview? A. We were about 30 people. 210. Q. Now, you reported directly to Mr. Smith? 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right now, of the newof Hive? A. We do have some, now, external clients, that we are trying to do some work for. And then some of the, still, interior ideas that we have had, trying to get them out the door.
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? A. They may have been. I don't know. 209. Q. How big was the operation in terms of numbers of people that were working at Bayview? A. We were about 30 people. 210. Q. Now, you reported directly to Mr. Smith? A. Yes. 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right now, of the newof Hive? A. We do have some, now, external clients, that we are trying to do some work for. And then some of the, still, interior ideas that we have had, trying to get them out the door. 223. Q. And what are the interior ideas that are sort of going forward at this point?
6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? A. They may have been. I don't know. 209. Q. How big was the operation in terms of numbers of people that were working at Bayview? A. We were about 30 people. 210. Q. Now, you reported directly to Mr. Smith? A. Yes. 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right now, of the newof Hive? A. We do have some, now, external clients, that we are trying to do some work for. And then some of the, still, interior ideas that we have had, trying to get them out the door. 223. Q. And what are the interior ideas that are sort of going forward at this point? A. Shed Pounds, Create My Suite, those
6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? A. They may have been. I don't know. 209. Q. How big was the operation in terms of numbers of people that were working at Bayview? A. We were about 30 people. 210. Q. Now, you reported directly to Mr. Smith? A. Yes. 211. Q. Did anyone report up to yourself? A. I had a graphic designer who 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right now, of the newof Hive? A. We do have some, now, external clients, that we are trying to do some work for. And then some of the, still, interior ideas that we have had, trying to get them out the door. 223. Q. And what are the interior ideas that are sort of going forward at this point? A. Shed Pounds, Create My Suite, those are the only two that are really moving forward at
6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	 Parrot at this point in time? A. I assume so. 207. Q. And who were you reporting to during this period? A. Chris. 208. Q. And these ideas, the Pubsite Network, the Create My Suite, the Shed Pounds, List 121, were these Chris' ideas, or do you know? Were they somebody else's? A. They may have been. I don't know. 209. Q. How big was the operation in terms of numbers of people that were working at Bayview? A. We were about 30 people. 210. Q. Now, you reported directly to Mr. Smith? A. Yes. 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 we don't have very many projects, so 220. Q. When you say "project management", what does that mean? A. So, basically taking the tasks to get some of these programs up and running and just try to get themfigure out what needs to be done, what is being done, how long it takes to be done. 221. Q. And then reporting to Chris Smith? A. Yes. 222. Q. What are the ongoing projects right now, of the newof Hive? A. We do have some, now, external clients, that we are trying to do some work for. And then some of the, still, interior ideas that we have had, trying to get them out the door. 223. Q. And what are the interior ideas that are sort of going forward at this point? A. Shed Pounds, Create My Suite, those

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	R. J. Pirie - 46			R. J. Pirie - 48
1	revenue?		Se	vered contact with all the payment processors once
2	A. I have no idea.	2		3 stopped.
3	225. Q. But in terms of promoting them, are	3	237.	Q. Do you have anylike, could you
4	you asking people to buy something or to contribute	4	ba	Ilparkdo you have any sense of the dollar value
5	something? Like, just from your promotional	5	of	subscriptions that Create My Suite might have
6	activities, would you have any visibility on the	6		ken in?
7	business model?	7	iu.	A. No.
		8	238.	Q. Or, activity on the website, like
8	A. The Create My Suite, there is a			
9	subscription, but we haven't really promoted it or	9	111	S?
0	done anything with it lately, soand the Shed	10		A. I imagine it's negligible, but I
1	Pounds was shelved and now we are trying to re-skin	11		n't know one way or the other.
2	it and give it a new name.	12	239.	Q. So apart from the interior projects,
3	226. Q. Did Shed Pounds ever have a	13	Hi	ve has some external clients as well. What does
4	subscription associated with it?	14	Hi	ve do for the external clients?
5	A. No.	115		A. Marketing, website building, graphic
6	227. Q. Did any of the other sites, that you	16	de	sign, copywriting, social media, video production.
7	are aware of, have subscriptions associated with	17	240.	Q. And who are those external clients?
8	them?	18	2101	A. I would rather not say.
9		19	241.	MR. WARD: Counsel, is it
	A. Create My Suite was the only one	20	241.	MP CEDPV: One thing that I am
0	that I know of.			MR. GERRY: One thing that I am
1	228. Q. And still does have a subscription	21		concerned about is I am not evenand you
2	associated with it?	22		never asked the question, there's just an
3	A. Yes.	23		assumption that Parrot has become Hive.
24	229. Q. How does the subscription work?	24		But I don't think my client knows precisely
25	A. People subscribe.	25		who owns Hive or what entity owns Hive.
	Page 47		Page 4	9
	R. J. Pirie - 47			R. J. Pirie - 49
1	230. Q. And is there a cost associated with	1	242.	MR. WARD: I think what his evidence was
2	subscribing?	2		that it was that Parrot changed its name to
3	A. I guess, yes.	3		Hive in Novemberaroundhe wasn't sure,
4	231. Q. What is that cost?	4		because he hadn't seen the paper, November
5		5		2014. So if it's a name change, and that's
		6		
6	month, and that gives someone access to the suite of			our information as well, then ownership
7	sites.			wouldn't change, it's essentially the same
8	232. Q. I take it, because we know from	8		company. And Parrot is directlyI
9	Banners Broker and some of these others, that often	9		mean, this is what Gillian is here to
0	there are payment processors that are involved in	10		investigate, Parrot.
1	the sites to allow people to make contributions per	11		MR. GERRY: Understood, I just wanted to
2	their subscriptions.	12		be certain that if he is being asked to
3	A. Okay.	13		divulge information about Hive Digital that
4	233. Q. Which payment processors is Hive	14		it is within the scope. Your information,
5	working with today?	15		it's a name change. Do you have any
5	A. I believe, for that, they use	16		evidence to support that? I mean, was
		17		there a change in the name? Is the company
7	Stripe, which isn't really a payment processor, it's			there a change in the name? Is the company
8	an online payment portal.	18	040	registered in Ontario or Canada?
1	234. Q. Right, it's called Stripe?	19	243.	MR. WARD: I don't know whether there is
	A. Yes.	20		a registered name change, but we have been
)	00E O Oliev any other antine neumant	21		told that itother business
)	235. Q. Okay, any other online payment			
) 1 2		22		MR. GERRY: It's the same entity?
0 1 2	portals	22	244.	MR. GERRY: It's the same entity? MR. WARD: It's the same entity.
9 0 1 2 3 4 5		22 23 24	244.	MR. GERRY: It's the same entity? MR. WARD: It's the same entity. MR. GERRY: Okay, well, perhaps,

	_ Sheet	14 Page 50 R. J. Pirie - 50		- Page 52
11	245.	MR. WARD: Okay, we can see. I'm not	1	you're absolutely right, I am not going to
	L7J.	sure that that would be necessarily	2	argue.
3		dispositive of it, but we can certainly	3	252. MR. WARD: Right.
4		have a look to see if there is something	4	MR. GERRY: So that's something I need
5		filed with the Ministry.	5	to know if he really has direct knowledge
6		MR. GERRY: Okay.	6	of that or not.
7	246.	MR. WARD: But it is our understanding		of that of flot.
8	240.	that it's the same business that	8	BY MR. WARD:
9		MR. GERRY: Could you establish that	9	253. Q. You are aware that Parrot became
10		first, with my client? I know that he	10	or I am asking you, did Parrot become Hive in or
11		casually said there was a name change, I	11	about November of 2014?
12		did hear that going into evidence, but to	12	A. I know that as a staff, we talked
13		meI am just concerned he may not	13	about a new company name. Whether that was a name
14		actually know. He is not privy to	14	change or whether that was a new company, or
15		corporation documents, ownership,	15	whetherthat, I don't know.
16		shareholders. It's not something he's	16	254. Q. Were there any staff changes or
17		privy to.	117	change in premises around this time?
18	247.	MR. WARD: I mean, in fairness, it's	18	A. No.
19		probably a discussion that we best have	19	255. MR. WARD: Well, why don't we take a
20		with the witness outside of the room, given	20	break and you can speak to him and see
21		what you just said. I will move on, but we	21	if
22		will see what we have got by way of		
19 20 21 22 23		corporate documents.	23	A BRIEF RECESS
24		MR. GERRY: Okay, well, I am happy to	22 23 24	
24 25		discuss that off the record, with my	25	ROBERT JAMES PIRIE, resumed
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	Page 52	1		Page 53
	Page 53	R. J. Pirie - 51		R. J. Pirie - 53
1	Page 5:	R. J. Pirie - 51 client, maybe step out to the hall, and can	1	R. J. Pirie - 53 CONTINUED EXAMINATION BY MR. WARD:
1 2	Page 5:	R. J. Pirie - 51		R. J. Pirie - 53 CONTINUED EXAMINATION BY MR. WARD: 256. Q. I think we established during the
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2261.Q.And what3Girl?4A.Again, vide5creation, social media6262.Q.Okay, ar7of the larger clients.A.8A.The larger9internal things.10263.Q.No.11A.I'm sorry, I12Those are the two13264.Q.Lick Mob14A.We have o15Richards.16265.Q.Tracy?17A.T-R-A-C-Y18266.Q.Okay.19A.She is a rel20We have done video p21creation for her.22267.Q.I take it th23ones that are top-of-m24A.The one that	nd give me a couple others, ones. You don't want am actually blanking. ile, Wellness Girl. ne called Tracy B. B. Richards. ationship consultant. production, social media, website here are no other big ind? atI can't believe I	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 R. J. Pirie - 56 A. Again, it's not listed, so I would rather not name her. 275. MR. WARD: Counsel, I am not going to press you now on the record, but perhaps if you could speak to your client and decide if you will let us know that after. MR. GERRY: Okay, thank you. U/T THE WITNESS: The person who is the VP of sales didn't start when any of this was going on. She came in after. BY MR. WARD: 276. Q. Brea Hardowa, was she working at Hive? A. Yes, no. No? Yes? No, I can't remember when she left, whether we had made the change to Hive at that point or not. 277. Q. What was her responsibility at Parrot, to your knowledge? A. She was the executive assistant to Chris, and she was also the office manager. 278. Q. Do you know when she left? Do you recall approximately when? A. After September but before
2changes right now. As think it's going as.3think it's going as.4268. Q. And same thing for Smoke Eupho5thing for Smoke Eupho6A. Yes, websit7production, social med8269. Q. How man9currently?10A. Currently, I1113 of us.12270. Q. Including13A. Maybe.14271. Q. About 13,15include Mr. Smith?16A. Yes. I just r17be an exact number.18272. Q. Who is se19Smith?20A. No one, real21small enough that22273. Q. Right.	R. J. Pirie - 55 rough its own series of name s of right now, that's what I e question, doing the same oria as the others? e building, video	25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Christmas. Page 57 R. J. Pirie - 57 279. Q. Do you have any knowledge as to why she left? A. She was stressed out and she wanted a job that wasn't so stressful. 280. Q. We are looking for contact information for her, we want to meet with Brea. A. Okay. 281. Q. We were in contact with her and then we fell out of contact with her. A. Okay. 282. MR. WARD: Can you, again, take this under advisement, but we would likedo you have contact information for Ms. Hardowa? MR. GERRY: I do. 283. MR. WARD: Okay, can you provide it to us? MR. GERRY: Do you want to hold that until the end? U/A Z84. MR. WARD: Sure, yes, we will. So we will take that as an under advisement. BY MR. WARD: Sure, yes, we will. So we will take that as an under advisement.

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_ Sheet 17 Page 62 R. J. Pirie - 62		Page 64 R. J. Pirie - 64
for example?		Tarantino-esque. So he said, "Go nuts." So BFD,
A. That, I heard of. I know that that	2	Big "Effing" Deal, was doing to be the name of it.
was Raj's second attempt after Stellar Point, at	3	I have been working on it as a side project for a
least that's what I thought.	4	year-and-a-half now.
302. Q. Were any of the numbered companies	2 3 4 5 6 7	Renaissance Jones was going to be the name
on the list that seem to ring a bell to you?	l õ	of the production company, but nothing ever happened
		with that. We did some casting at one point, but
A. I don't know.		
303. Q. No?	8	this was more of just a lark.
A. No.	9	312. Q. So was Renaissancedo you know
304. Q. Similarly, with respect to	10	whether or not Renaissancewhose companywas
Mr. Josun, who I understand you have never met	11	Renaissance Jones ever set up as a company?
and you have never spoken to, but you had heard of	12	A. I have no idea. I don't know.
him.	13	313. Q. We understand that Renaissance
A. M'hmm.	14	Joneswas the work done while you were at the
305. Q. Was there anything else that you	15	Bayview property?
board shout him in terms of his lifestule or manou	16	A. No, it was before we moved into the
heard about him in terms of his lifestyle or money		
that he may have taken from the Banners Broker	17	Bayview property.
company?	18	314. Q. Because we have seen a sign on the
A. This is hearsay, but I do seem to	19	Bayview property that says
remember there being a story that he was taking	20	A. Yes, ŘJP.
money directly from affiliates, not putting it	21	315. Q. RJP, is thatRJP for Renaissance
through the system, and then just creatingbecause	22	Jones Productions?
it was digital materials that we were working with,	23	A. Yes. The fact that it's my initials
he would just create it and give it to the people,	24	is a complete fluke.
but then he would keep the money.	25	316. Q. That hadn't occurred to me.
but then he would keep the honey.	120	
Page 63		Page 65
R. J. Pirie - 63		R. J. Pirie - 65
R. J. Pirie - 63 306. Q. But apart from that, there wasn't	1	R. J. Pirie - 65 A. Okay, well, then ignore that.
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			- 411
	Sheet 18 Page 66 R. J. Pirie - 66		Page 68 R. J. Pirie - 68
1	were any costs associated with this project?	1	A. No, this was actuallyone
2	A. The only costs that would have been	2	affiliate who, apparently, types really quickly, she
2	A. The unity costs that would have been		would take her own notes after the webinars and then
I S	associated with this was, as I said, the casting.		I would take their own notes after the webling and make sure
4	322. Q. And so when you were auditioning	4	I would review them just for spelling and make sure
5	people, they would be paid?	5	that everything was appropriate, and then we would
2 3 4 5 6 7	A. No, it was just awe had kind of	6	post it.
	an open house evening. We had some food. We had	7	332. Q. So in terms of what Mr. Smith said,
8	some music. We invited people to come in. The	8	do you know whether or not this is an accurate of
9	property is two floors, so the upstairs was kind of	9	what he said during the webinars?
8 9 10 11	the mingling area, the downstairs was the audition.	10	A. To the best of my knowledge.
11	323. Q. But in terms of magnitude of costs,	11	333. Q. And, similarly, in terms of where
12	that wouldn't have been a large number?	12	it's indicated that Ron Anderson was speaking, that
13	A. No. I am still working on the	13	was yourself, I assume?
14	script. I would like to develop it one day, but	14	A. Yes.
14 15 16 17	324. MR. WARD: Let's mark this, if we could,	15	334. Q. Do you know whether the transcript
16	please as Exhibit P2.	116	of the Ron Anderson speaking portions of this
17	1	17	document are accurate?
18	EXHIBIT NO. P2: 3-page printout from Renaissance	18	A. I believe so.
18 19	Jones Productions re: film entitled	19	335. Q. How would you prepare for these
20	"Big Fucking Deal"	20	webinars?
20 21	Big Fasiking Boal	21	A. I would talk to Chris before the
22	BY MR. WARD:	22	webinar, we would discuss what sort of topics we
22 23 24	325. Q. Was Chris Smith going to have a role	23	were going to talk about and then just talk.
20	in this movie?	24	336. Q. And you would take questions?
25	A. I don't think he wanted one.	25	A. Yes. The questions were in the form
25			
	Page 61		
	Page 67 R Pirio - 67		Page 69 R Pirio - 60
4	R. J. Pirie - 67	1	R. J. Pirie - 69
1	R. J. Pirie - 67 326. Q. Was someone going to play Chris	1	R. J. Pirie - 69 of a chat window. So that's why you never see a
1 2 2	R. J. Pirie - 67 326. Q. Was someone going to play Chris Smith in the movie?	1	R. J. Pirie - 69 of a chat window. So that's why you never see a transcript of someone speaking.
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	Sheet 19 Page 70		Page 72 4 2
	R. J. Pirie - 70	$\neg \Box$	R. J. Pirie - 72
1	341. Q. Were you involved, at all, in World	1	353. Q. And where are you, what are you
2	eWallet?	2	doing, why are you wearing a toupee?
3	A. Nope.	3	A. That's in Trinidad. That is just
	342. Q. Do you know a gentleman by the name	4	before the BB World Tour.
4	of Michael Kraemer?	5	354. Q. And are you presenting to somebody?
6	A. Yes.	6	A. At that time, no. That was just a
7	343. Q. And was World eWallet his company?	7	pose.
8	A. To the best of my knowledge.	8	355.' Q. Okay.
9	344. Q. And what were your dealings, if any,	9	 But the presentation would come
10	with Mr. Kraemer? How do you know of him?	10	later.
11	A. He knew Chris. He was in the office	11	356. Q. And that came later, during the same
12	a few times. And I met him, I talked to him. He	12	trip in Trinidad?
13	was in Trinidad because he did a presentation as	13	A. Yes.
14	well.	14	357. Q. And how many affiliates were there?
15	345. Q. I take it Banners Broker had	15	Can you give me an estimate?
16	problemsdifficulties finding payment processors	16	A. 300 to 500, maybe.
17	over the years?	17	358. Q. And you spoke to them on what
18 19	A. I guess so.	18	topics?
19	346. Q. Why was that?	19	A. I did a presentation onour
20	A. I don't know. I was just told	20	introductory presentation. So if someone wants to
21	either that payment processors didn't want to work	21	introduce someone else to the Banners Broker
22	with us anymore or that we weren't working with	22	program, we provide a PowerPoint presentation and
23	payment processors, and I was to communicate that to	23	the talking points for them to do that. So this new
22 23 24 25	the affiliateship.	24 25	presentation emphasized social media.
25	347. Q. Right.	2	359. Q. Did you present on anything else?
	Page 71 R , J Pirie - 71		Page 73 B. J. Pirie - 73
1	R. J. Pirie - 71		R. J. Pirie - 73
1	R. J. Pirie - 71 A. The relationships that Chris had	1 2	R. J. Pirie - 73 A. No.
1 2 3	R. J. Pirie - 71 A. The relationships that Chris had with these people and how things came to be, was	1 2 3	R. J. Pirie - 73 A. No. 360. Q. There is a sign on the podium it
3	R. J. Pirie - 71 A. The relationships that Chris had with these people and how things came to be, was never part of my	1 2 3 4	R. J. Pirie - 73 A. No.
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345	R. J. Pirie - 71 A. The relationships that Chris had with these people and how things came to be, was never part of my 348. MR. WARD: Yes, let's mark this as	3 4 5 6	R. J. Pirie - 73 A. No. 360. Q. There is a sign on the podium it says, "No cameras or photography allowed."
345	R. J. Pirie - 71 A. The relationships that Chris had with these people and how things came to be, was never part of my 348. MR. WARD: Yes, let's mark this as	3 4 5 6 7	R. J. Pirie - 73 A. No. 360. Q. There is a sign on the podium it says, "No cameras or photography allowed." A. Yes. 361. Q. Do you know why that was? A. Part of it was, as it was explained to me by Chris, that he wanted people to come to the
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	Check 20 Dege 74		Page 76
	Sheet 20 Page 74 R. J. Pirie - 74		R. J. Pirie - 76
1	at that time, there was a lot of negative press.	1	wearing a toupee in Trinidad
1	There had been death threats. There had been		BY MR. WARD:
2			
3	threats of assault and abuse against Chris, Raj,		373. Q. I have just passed the witness
4	their families. So he wanted to try to same me	4	another colour photocopy of four people. Can you
5	that. As I mentioned, I am working on a screen	5	tell me what it is that we are looking at, sir?
6	play, I have written some other things. So the idea	6	A. That would be me.
7	was to protect my name, as much as possible, from	7	374. Q. Are all the photographs of yourself?
8	the people who were saying horrible, horrible things	8	A. Yes.
9	online.	9	375. Q. Do you know where they were taken?
10	367. Q. We heard as well that there were	10	Just describe the circumstances in which they were
11	some threats that were made against some of the	111	taken.
12	principals of this organization around that time.	12	A. So the ones with the hair were taken
13	A. I received some too.	13	in Trinidad, and the one without the hair was a
14	368. Q. Tell me about that. Why was it that	14	photoa picture, actually, Mr. D'Eall took of me
14 15	these people were being threatened, and by whom?	15	for my website, for my writing.
16	MR. GERRY: Sorry, Counsel, what is the	16	376. Q. Have you seen this particular
17	relevance to the scope of this examination	17	photograph before, with the four overlays?
18	of this particular line of questioning?	18	A. Yes.
19	369. MR. WARD: Well, I mean, he is an	19	377. Q. And where did you see it?
20	omplayed of the debter and he is wearing a	20	
20	employee of the debtor, and he is wearing a		
	disguise and he's speaking to 500 investors	21	ponzi-scam. Either that or Tara Talks BlogSpot.
20 21 22 23 24	in the debtor. Now, you may disagreeyou	22	378. MR. WARD: Thank you. So let's mark
23	may have some view that that's not	23	this as Exhibit P5.
24	relevant, but it is an investigatory	24 25	
25	receivership and the fact that an officer	25	
	Page 75		
			Page 77
	R. J. Pirie - 75		R. J. Pirie - 77
1	R. J. Pirie - 75 of the debtor would disguise his identity	1	R. J. Pirie - 77 EXHIBIT NO. P5: Colour photocopy of 4 colour photos-
1	R. J. Pirie - 75 of the debtor would disguise his identity and give presentations to 500 creditors, I	1 2	R. J. Pirie - 77 EXHIBIT NO. P5: Colour photocopy of 4 colour photos- in-one of Robert Pirie with
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	Sheet 21 Page 78		Page 80 4 4
	R. J. Pirie - 78		R. J. Pirie - 80
11	individuals are.	1	A. Yes.
2	A. He worked at Stellar Point. He did	2	395. Q. And can you
3	social media.	3	A. I would rather not.
4	384. Q. Was this his photograph taken in	4	396. Q. You don't know why this is called
5	Trinidad?	5	"Banners Broker Wedding"?
	A. No, that's mine.	6	
6			A. I know why it's called
7	385. Q. Just yours, the one in the middle?		397. Q. Okay, so just let'sI have asked
8	A. Yes.	8	him to let us know who the other Banners Broker
9	386. Q. And have you seen this particular	9	employees are in this photograph, Counsel, and I'll
10	sequence of photographs before?	10	take his refusal
11	A. Yes.		A. Okay, may Inone of them are
12	387. Q. And where did you see them?	12	Banners Broker employees. The people who are there
13	A. Again, online, either the Facebook	13	are Parrot employees.
14	or the Tara Talks BlogSpot.	14	398. Q. Is Mr. Driscoll in the photograph?
15	388. MR. WARD: Ökay, thank you. Let's mark	15	A. No.
16	this as the next exhibit. This will be P6.	16	399. Q. Is Brea Hardowa in the photograph?
17		17	A. No.
18	EXHIBIT NO. P6: Colour photocopy with 3 colour	18	400. Q. Stephanie Schlacht?
19	photos; two of Robert Pirie, one of	19	A. No.
	David Ledressay	20	401. Q. Michael Kraemer?
21	,	21	A. No.
20 21 22	BY MR. WARD:	22	402. Q. Williamson, Chris Smith's cousin, is
23	389. Q. And, lastly, I have just passed the	23	he in the photograph?
24	witness a photograph entitled "Banners Broker	24	A. Peter Williams?
25	Wedding". Sir, can you identify yourself and just	25	403. Q. Peter Williams.
	Page 79	J	Page 81
1	R. J. Pirie - 79		R. J. Pirie - 81
1	R. J. Pirie - 79 describe the circumstance in which this was taken	1	R. J. Pirie - 81 A. No.
1 2 3	R. J. Pirie - 79 describe the circumstance in which this was taken and why it's titled "Banners Broker Wedding", if you	1 2 3	R. J. Pirie - 81 A. No. 404. MR. WARD: Thank you. So let's mark
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3 4 5 6	R. J. Pirie - 79 describe the circumstance in which this was taken and why it's titled "Banners Broker Wedding", if you know. A. Because an affiliate gave it that name. This was a photo of a buddy programmer who got married in the Dominican Republic. We went down	3 4 5 6	R. J. Pirie - 81 A. No. 404. MR. WARD: Thank you. So let's mark this as the next exhibit. This is Exhibit P7. EXHIBIT NO. P7: Colour photograph entitled "Banners
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	R. J. Pirie - 82		R. J. Pirie - 84
1	409. Q. In the context of the Banners Broker	1	Waterman, is that possibly one?
2	organization, obviously.	2	A. Yes, I think so.
3	A. Yes.	3	423. Q. Okay, I will make a note of it.
4	410. Q. So what does that terminology	4	A. Jamie, Mark and Gino were kind of
5	describe, to be an independent contractor? What	5	the three most involved. There were some other ones
67	does that mean, to your knowledge?	6	who had large teams who were less involved. Alan
	A. I am not entirely sure. It was	7	Sills was one, Al Baker.
8	something that they were doing while I was still at	8	424. Q. Alan Sills? A. A-L-A-N S-I-L-L-S.
9 10	Stellar Point. It wasn't anything that I really dealt with. As far as I knew, it just meant they	10	425. Q. Yes.
11	ran a support centre in different countries, that	111	425. Q. 165. A. Al Baker.
12	could provide support in a language other than	12	426. Q. Okay.
13	English.	13	A. And I feel like there are a few
14	411. Q. So going back to the concept of	14	more, but I can't think of their names right now.
15	affiliates, which is something that you had	15	427. Q. And, I mean, you described them as
16	mentioned yourself at the beginning of the morning.	16	big affiliates
17	A. Yes.	17	A. No, you described them as big
18	412. Q. Was there a hierarchy of affiliates	18	affiliates.
19	in any way, were some affiliates bigger than others?	19	428. Q. Can you tell me whyI described
20	A. What do you mean by "bigger"?	20	them as "super affiliates", and you hadn't heard
21	413. Q. Well, it goes back to the concept of	21	that expression before.
21 22 23	super affiliates, affiliates who were more involved	22	A. No.
23	in the organization. Part of what you told us	23	429. Q. But why have you given me these
24 25	before the break is that you would liaise with	24	names, in what sense are they
L	affiliates?	25	A. These people had large teams of
	Page 83		Page 85
1	R. J. Pirie - 83		R. J. Pirie - 85
1	R. J. Pirie - 83 A. M'hmm.	1	R. J. Pirie - 85 affiliates working with them, so they invited,
1	R. J. Pirie - 83 A. M'hmm. 414. Q. And were there some affiliates that	1	R. J. Pirie - 85 affiliates working with them, so they invited, invited a number of people, and the people they
1 2 3	R. J. Pirie - 83 A. M'hmm. 414. Q. And were there some affiliates that you were liaising with more than others?	1	R. J. Pirie - 85 affiliates working with them, so they invited, invited a number of people, and the people they invited a number of people, so they helped to work
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1 2 3 4 5 6	R. J. Pirie - 83 A. M'hmm. 414. Q. And were there some affiliates that you were liaising with more than others? A. Yes. 415. Q. And who were those?	1 2 3 4 5 6	R. J. Pirie - 85 affiliates working with them, so they invited, invited a number of people, and the people they invited a number of people, so they helped to work with their teams, I guess, provide additional training, provide assistance.
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	Sheet 23 Page 86		Page 88
	R. J. Pirie - 86		R. J. Pirie - 88
1	432. Q. Okay, so these people could escalate	1	country or what jurisdiction?
2	things to you	2	A. Okay.
3	A. Yes.	3	448. Q. Because I take it that they were not
4	433. Qfrom the CSRs?	4	all Canada.
5	A. Yes.	5	A. No.
6	434. Q. And you dealt with them on a regular	6	449. Q. So Mark Ghobril?
7	basis?		A. U.S.
8	A. Yes.	8	450. Q. Where in the U.S.? A. New York.
9 10	435. Q. And you were problem-solving for	9	451. Q. New York City?
11	them, essentially? A. I tried to.	111	A. New York State.
12	436. Q. Right. Do you have a sense of what,	12	452. Q. Where, do you know?
13	you know, their financial contribution was to the	113	A. A word that I can never remember.
14	Banners Broker business?	14	453. Q. Justit would simplify things, do
15	A. I have no idea.	15	you have contact information for these people?
16	437. Q. And were you involved, or do you	16	A. No.
17	have knowledge of any payouts that may have been made to these individuals in the course of the	17	454. Q. How can the Receiver find out where
18		18	these people are?
19	Banners Broker business?	19	A. I don't know.
20	A. No.	20	455. Q. How did youif you had to contact
21	438. Q. So would they approach you with	21	them, how would you contact them when you were at
21 22 23	concerns having to do with payouts, for example?	21 22 23	Stellar Point?
23	A. A couple of them would.	23	A. When I was at Parrot, I used Skype
24 25	439. Q. And what would happen? A. I would tell Chris.	24 25	to talk to them, Skype and e-mail.
25			456. Q. And when you were at Stellar Point,
	Page 87		Page 89
1	Page 87 R. J. Pirie - 87		Page 89 R. J. Pirie - 89
1	Page 87	1	Page 89
1 2 3	R. J. Pirie - 87 440. Q. And then what would happen? A. I have no idea.	1 2 3	R. J. Pirie - 89 the same way?
1 2 3 4	R. J. Pirie - 87 440. Q. And then what would happen? A. I have no idea. 441. Q. So your area of responsibility did not extend to discussing financial matters with	1 2 3 4	R. J. Pirie - 89 R. J. Pirie - 89 the same way? A. I didn't talk to them when I was at Stellar Point. I met Mark once, when I was at Stellar Point, but it was justhe came up for a
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 Page 87 R. J. Pirie - 87 440. Q. And then what would happen? A. I have no idea. 441. Q. So your area of responsibility did not extend to discussing financial matters with these people, is that your evidence? A. Correct. 442. Q. And you have given me a list of names, and most of them are familiar to me. A. Yes. 443. Q. There is another one, I will ask you if you have heard of, which is lan Driscoll? A. Yes. 444. Q. Should he be on that list as well? A. No. He wasthings happened, like there was athings happened between him and Chris. I know thatI have heard both sides of the stories, but it was before my time. 445. Q. So why shouldn't he be on this list of, sort of, higher up affiliates? A. Because I neverI never talked to him or liaised with him. 446. Q. I see. And you have never met him? 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Page 89 R. J. Pirie - 89 the same way? A. I didn't talk to them when I was at Stellar Point. I met Mark once, when I was at Stellar Point, but it was justhe came up for a visit and he was kind of there in the background. 457. Q. But you don't have contact information for any of them now? A. No. 458. Q. Do you know how we could get it? A. No. 459. Q. Jamie Waters? A. He is in the U.K. 460. Q. And if possible, can you give a city? A. If I can, I will specify. I don't know. 461. Q. Gino Van DeWalle. A. Van DeWalle, I believe he is actually deceased. 462. Q. Where was the gentleman? A. Portugal. 463. Q. Mark Waterman?

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	Sheet 24 Page 90		Page 92
	R. J. Pirie - 90		R. J. Pirie - 92
1	A. He was U.S., Montana or Colorado, I	1	479. Q. Why did you chose not to participate
2	believe.	2	in Banners Broker?
3	465. Q. And Al Baker?	3	A. I am not allowed to. I would be an
4	A. I believe he was France, Paris.	4	employee. That would be a conflict of interest.
5	466. Q. Are any of these gentlemen pictured	5	480. Q. Was that in the contract that you
6	in the Banners Broker Wedding picture?	6	showed us or was it something you were told
7	A. No.		separately? I didn't see it in there.
8	467. Q. And is there anyone else that is not	8	A. I don't think it was in there.
9	on this list that we have reviewed, that you had a	9	481. Q. But regardless, you were told?
10	significant level of dealings with as an employee of	10	A. Yes.
11	Stellar Point and Parrot?	11	482. Q. By who? A. I was probably told while I was
12 13	A. Martin Wilde (phon.) is another name that comes to me, and he's U.K.	13	still at Stellar Point.
14	468. Q. Did these people ever complain to	14	483. Q. Right.
15	you about losing money in Banners Broker?	15	A. And I just assumed that that would
16	A. About losing money?	16	carry on.
17	469. Q. Yes.	17	484. Q. Right. Do you know whether or not
18	A. I don't think so.	18	Brea Hardowa or Stephanie Schlacht or any of the
19	470. Q. Did they ever tell you how much	19	other employees of these companies that we have
20	money they made in Banners Broker?	20	talked about were involved as affiliates in the
21	Á. No.	21	organization?
22	471. Q. Do you have any sense of whether or	22	A. I would assume not, but I don't
21 22 23 24	not they did well?	23	know. I think Raj was also an affiliate.
24	A. Yes, they all did well.	24	485. Q. Raj Dixit?
25	472. Q. Okay, and you sound convinced of	25	A. M'hmm, but, again, that's hearsay.
<u></u>	Page 91		Page 93
4	R, J. Pirie - 91		R. J. Pirie - 93
	that, why is that? How do you know that? How do		I never saw anything that said one way or the other. 486. Q. Justin terms of all the webinars
23	you know they did well? A. Because that's part of why they were		that you gave, and you started giving them when you
4	the leaders.		were at Stellar Point
5	473. Q. Now, would it surprise you if I told	4	A. M'hmm.
	you that the leaders in this organization, the	6	487. Qand continued right up until
67	Receiver's information is they were taking out	1 7	essentially the end of August 2014.
	hundreds of thousands or dollars and perhaps	8	A. M'hmm.
89	millions of dollars?	9	488. Q. Did you develop a sense of the
10	A. That wouldn't surprise me.	10	Banners Broker business model?
11	474. Q. And your compensation, as you told	11	A. Yes.
12	us, relative to that was quite low; correct?	12	489. Q. And can you just describe for me
110			
13	A. Yes.	13	what your understanding of the business model was?
14	475. Q. In the range between \$46,000 and, I	14	A. Affiliates would buy ad impressions.
14 15	475. Q. In the range between \$46,000 and, I think, \$56,000?	14	A. Affiliates would buy ad impressions. They would use it on panels that they could also
14 15 16	475. Q. In the range between \$46,000 and, I think, \$56,000? A. M'hmm.	14 15 16	A. Affiliates would buy ad impressions. They would use it on panels that they could also purchase and panels represented advertising space.
14 15 16 17	 475. Q. In the range between \$46,000 and, I think, \$56,000? A. M'hmm. 476. Q. Did that become an issue at any 	14 15 16 17	A. Affiliates would buy ad impressions. They would use it on panels that they could also purchase and panels represented advertising space. As people saw that space online, affiliates earned
14 15 16 17 18	 475. Q. In the range between \$46,000 and, I think, \$56,000? A. M'hmm. 476. Q. Did that become an issue at any point, as between yourself and Mr. Smith? 	14 15 16 17 18	A. Affiliates would buy ad impressions. They would use it on panels that they could also purchase and panels represented advertising space. As people saw that space online, affiliates earned revenue, and then when their time was up, they got
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	Sheet 25 Page 94		410 Page 96
	R. J. Pirie - 94		R. J. Pirie - 96
1	providers who were actually providing us advertising	1	a sensedid you not have a sense of the growing
2	space, what the cost of the advertising space was.	2	level of dissatisfaction with the business model at
	Space, what the cost of the adventising space was.	3	Banners Broker?
3	I just knew how the system was designed to work, and		
4	that's what I taught to people when they asked.	4	A. Yes.
5	492. Q. I mean, you say that you assume it	5	501. Q. And just describe for me how you
6	did.	6	came to appreciate that things weren't working at
7	A. That didn't work well, because, then	7	Banners?
8	we wouldn't be here.	8	A. There was lots of negative talk
9	493. Q. Well, yes. And, in fairness, you	9	online. There was also lots of positive talk, but
10	have also told us about the compliance department	110	it seemed like the negative was outpacing the
11	and the negative comments and the negative social	111	positive.
12	media buzz and even death threats against	12	502. Q. And who was primarily responsible
13		13	for controlling the negative talk? You were not in
	principals		for controlling the negative talk? You were not in
14	A. M'hmm.	14	the compliance department, you told us, and I think
15	494. Qwhich we didn't get into. But	15	you told us it was Hooker, but I just want to be
16	having said all that, you can't have believed, at	16	A. Yes, originally, Hooker was
17	the time, that the business model was working?	17	responsible for compliance.
18	A. I thought it was flawed, but I think	18	503. Q. Okay, and thenit was Hooker. Was
19	lots of business models are flawed.	19	there anybody after Hooker, or anyone other than
19 20 21	495. Q. Even Chris Smith takes the position	20	Hooker that was responsible for the compliance side
21	that the business model was flawed. Subject to hack	21	of things?
22	attacks, for instance?	22	A. I know that Jamie Waters also helped
23	A. M'hmm.	23	with compliance.
20		24	
24 25	496. Q. What do you know about flaws in the business model?	24	504. Q. What about the payout mechanism? Because the business model had an earning structure,
12.1	DUSIDESS DIGDELC		
20			
	Page 95		Page 97
	Page 95 R. J. Pirie - 95		R. J. Pirie - 97
1	R. J. Pirie - 95 A. Specifically	1	R. J. Pirie - 97 as I understand it.
1 2	R. J. Pirie - 95 A. Specifically 497. Q. Hack attacks, for example?	1 2	R. J. Pirie - 97 R. J. Pirie - 97 as I understand it. A. M'hmm.
1 2 3	R. J. Pirie - 95 A. Specifically 497. Q. Hack attacks, for example? A. There wereI know that there were	1 2 3	R. J. Pirie - 97 R. J. Pirie - 97 as I understand it. A. M'hmm. 505. Q. And then there was also a payout
1 2 3 4	R. J. Pirie - 95 A. Specifically 497. Q. Hack attacks, for example? A. There wereI know that there were people who were able to infiltrate the system and	1 2 3 4	R. J. Pirie - 97 R. J. Pirie - 97 as I understand it. A. M'hmm. 505. Q. And then there was also a payout mechanism.
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1 2 3 4	R. J. Pirie - 95 A. Specifically 497. Q. Hack attacks, for example? A. There wereI know that there were people who were able to infiltrate the system and basically create themselves inventory that would generate revenue that they never paid for. I know	1 2 3 4 5	R. J. Pirie - 97 R. J. Pirie - 97 as I understand it. A. M'hmm. 505. Q. And then there was also a payout mechanism. A. M'hmm. 506. Q. What do you know about the payout
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	 Page 95 R. J. Pirie - 95 A. Specifically 497. Q. Hack attacks, for example? A. There wereI know that there were people who were able to infiltrate the system and basically create themselves inventory that would generate revenue that they never paid for. I know people stole money from other people saying that they would give them things. I knowthere were looplike in any technical system, there were loopholes that people would find out and exploit. Ways to earn money faster or up the amount or make it faster how they earned their money. 498. Q. Right, and you knew that was happening a lot in the Banners Broker case, unfortunately? 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	 Page 97 R. J. Pirie - 97 as I understand it. A. M'hmm. 505. Q. And then there was also a payout mechanism. A. M'hmm. 506. Q. What do you know about the payout mechanism for Banners Broker, in terms of efficiency with which that operated? A. I know that there were a lot of people complaining that they weren't receiving their payouts, near the end. I know that Chris singlehandedly took care of all of that. 507. Q. So if someone complained to you, or you had heard that someone had complained about not being able to be paid out, where would you go? What
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Page 95 R. J. Pirie - 95 A. Specifically 497. Q. Hack attacks, for example? A. There wereI know that there were people who were able to infiltrate the system and basically create themselves inventory that would generate revenue that they never paid for. I know people stole money from other people saying that they would give them things. I knowthere were loopholes that people would find out and exploit. Ways to earn money faster or up the amount or make it faster how they earned their money. 498. Q. Right, and you knew that was happening a lot in the Banners Broker case, unfortunately? A. I didn't know that it was happening a lot, I just knew that it did happen. 499. Q. Did you have some sense of how frequently it was happening? A. No clue. 500. Q. Judging by the levels of complaint that you were experiencing while you were monitoring 	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 18 9 20 21 22	 Page 97 R. J. Pirie - 97 as I understand it. A. M'hmm. 505. Q. And then there was also a payout mechanism. A. M'hmm. 506. Q. What do you know about the payout mechanism for Banners Broker, in terms of efficiency with which that operated? A. I know that there were a lot of people complaining that they weren't receiving their payouts, near the end. I know that Chris singlehandedly took care of all of that. 507. Q. So if someone complained to you, or you had heard that someone had complained about not being able to be paid out, where would you go? What would you do? A. If it was a standard affiliate, then I would just tell them to follow the system, follow the steps as they were originally told. If it was one of these super affiliates, I would talk to Chris. 508. Q. And the super affiliates, because

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	Sheet 26 Page 98 R. J. Pirie - 98		Page 100 R. J. Pirie - 100
11	509. Qand you would tell Chris to what,	1	the garbage or deleting it or chucking it out the
2	to handle it?	2	door?
3	A. No, I would just say that they were	3	A. I didn't see any of those things. I
4	asking.	4	know that Ilike, I had a bunch of webinars that I
5	510. Q. And then how did you advance the	5	had recorded, gigs, hundreds of gigs of stuff, so
6	issue further?	6	just to free up space on my machine, I just deleted
7	A. I didn't. Because all of these	7	them all.
8	people had direct lines to Chris	8	520. Q. Right.
9	511. Q. Right.	9	A. And since I was deleting that, I
10	Aon their own. And they	10	decided to delete everything else, because I didn't
11	circumvented me quite a bit, to talk to him	11	really foresee we were going to need it anymore.
12	directly.	12	521. Q. Did anyone ask you to delete those
13	512. Q. Do you know whether or not Chris	13	materials?
14	could resolve those issues?	14	A. No.
15	A. I don't know.	15	522. Q. Did you tell anyone at the time that
16 17	513. Q. I dropped in during the break and I	110	you were going to delete those materials?
10	mentioned that I wanted to talk a bit about	18	A. I may have mentioned it. 523. Q. But you don't recall?
18	documents. Because the Receiver, obviously, has an	19	523. Q. But you don't recall? A. Not that I can recall, no.
19 20	interest in bringing in documents, to the extent that they exist, and they can be in paper form or	20	524. Q. And did you tell anyone prior to
20	electronic form. You have given us a copy of an	21	telling me just now, that you had deleted those
21	employment agreement	22	gigabytes of materials?
22	A. M'hmm.	22 23	A. I may have.
24	514. Qthank you for that. Is there	24	MR. GERRY: Besides discussions with
21 22 23 24 25	anything else, in addition to that, let's talk about	25	counsel, of course.
	Page 99		Page 101
	R, J. Pirie - 99		R. J. Pirie - 101
1	paper documents first, that you have in relation to	1	525. MR. WARD: Right, okay.
2	any of the companies that we talked about today? Is	23	• •
23	there anything else that you have?		BY MR. WARD:
4	A. I have a training manual from	4	526. Q. Were you aware that Banners Broker
5	Banners Broker beforewhen I was still doing that,	5	was in an insolvency proceeding at that time?
6	but that is about all I have got left. I got rid of	6	A. I knew thatyes.
7	everything else once everything wentstopped.	7	527. Q. And what about the paper records
8	515. Q. That was late August of last year?	8	that you would have had, how were they handled? The
9	A. I probably did it closer to the end	9	Banners Broker, Stellar Point, Parrot records
10	of September.	10	relating to Banners Broker, what happened to them?
11	516. Q. Okay, and when you said "did it",	12	A. I have a stack of the manualI
12	because I am trying to picture in my mind, you are		have got 30 copies of the manual at home that my
13	up at Bayview, at this point. A. M'hmm.		kids use for scrap paper. 528. Q. Right.
14 15	A. M'hmm. 517. Q. And you are all aware that the	13 14 15	528. Q. Right. A. Because I printed it off, and then
16	company is in an insolvency proceeding?	16	we ended up not doing the training, so I just
17	A. M'hmm.	17	brought it home. But there really weren't a lot of
18	518. Q. And up until then, a lot of people's	18	paper documents, to the best of my knowledge.
19	time had been spent on Banners Broker matters, and	19	529. Q. But apart from the manuals, there
20	then you moved to doing non-Banners Broker work at	20	must have been something, though, right?
21	Parrot. So what happened to all of thenot just	21	A. Such as? My blogs were all
22	yours, but other people'swhat happened to the	22	online
22 23	Banners Broker records, the software, the servers?	22 23	530. Q. Notes of calls, lists of affiliates,
24		24	
25	519. Q. Did you see people throwing it in	25	desk, presumably there was something other than the
24	A. I have no idea.	24	contact information for affiliates. Like, on your

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All and the standing manual, right, when you were full-time BE? R. J. Pride - 104 1 training manual, right, when you were full-time BE? A. Lassume so. 3 G. And that was all delated? A. Yes. 5 A. Yes. Some people used their personal 6 Some people used their personal e-mails variation of the some some some some some some some som		Sheet 27 Page 102		Page 104
1 training manual, tight, when you were full-lime BB? 1 their communicating with affiliates and with each other? 2 A. Just about everything I did, I did to the main you can be the communicating with affiliates and with each other? 3 A. I assume so. 4 531. Q. And that was all delered? 3 A. I assume so. 4 532. Q. Is there anything I did you are aware of? 5 A. Some people used their personal 6 businesses that we talked about that you are aware of? 542. Q. Okay, and who. al. Stellar Point, and 1 main grant and did that the witness has? 1 543. Q. But was three an IT person there, and the would know. 13 Like I am dealing with Sellar Point, not. 14 544. Q. You have got Pai at the tool would know. 14 training markel. UT 15 544. Q. You have got Pai at the tool would know. 15 Just, while we are on it, have an the witness has? UT 16 was three an IT person that we could speak to tor to the weat the the anal was still handled by Paroting the attending. 16 Just, while we are on it, have an too check to see with the readiary to provide actional com documents. 16 A. Stellar Point, intat e-mail was still handled by Paroting the ernal. 17 tretaming materials. Like I and dealing w		R. J. Pirie - 102		
2 Å. Just abört everyfning I dd. I did 2 other? 3 from my computer. A. Yes. A. Iassume so. 5 A. Yes. S. Some people used her personal 6 Stat. Ox. Is three anything that is still axailable. In electronic form, related to the 7 axailable. In electronic form, related to the Fast. During and the most of the bast of my knowledge. 10 A. Not to the bast of my knowledge. There might be some oid, ob stuff from Stellar 11 There might be some oid, ob stuff from Stellar There might be some oid, ob stuff from Stellar 12 Point and there is any ubit would be There might. There might be some oid, ob stuff from Stellar 13 MR. WARD: Thanks, and to check to see UT Stat. O. You are got Fast. There mails? 14 Stat. O. MR, WARD: Thanks, and to check to see UT Stat. O. At Stellar Point, now. Stat. O. At Stellar Point, now. 15 Stat. MR, WARD: Thanks, and to check to see Stat. O. At Stellar Point, the see and there and the	1		1	
3 from my computer. 3 A. Lassume so. 4 531. Q. And that was all deleted? A. Yes. 6 322. Q. Is there anything that is still 5 7 available, in electronic my knowledge. 5 10 A. Not to the best of my knowledge. 5 11 There might be some oid, obt stiff from Stellar 11 12 Point one of my computers, but it would be training marteriata. 11 13 MR. WAPD: Okay, so, Counsel could I 13 14 Sista. MR. WAPD: Okay, so, Counsel could I 13 15 just, while we are on there waters that? 14 16 undertaking, undertaking by stim stistast passed me an nels tong	2	A. Just about everything I did. I did	2	
4 531. Q. And that was all deleted? 5 A. Yes. 6 532. Q. Is there anything that is still 7 available, in electronic form, related to the 8 businesses that we alked about this you are aware 9 of? 10 A. Not to the best of my knowledge. 11 There might be some oid, old stiff from Stellar 12 Point on ore of my computers, but it would be 13 training materials. 14 533. NR. WARD: Okay, so, Counsel, could it 15 training materials. Ut that the two sold socy of that, the 16 unoretaking to produce a coyy of that, the 544. O. You are of the weals. 17 Taking manual math the winess has? Ut the tot mo of the soci of the weal to the tot mo of the weal to the could soci of the weal tot to the mals? 18 MR. GERRY: Okay, we will give you that A. To the best of my knowledge. 11 Part of the mal system from that weas thore provide mask tore on the reas any ob Stellar 25 G. My colleague has just passed me a 3 note to try understand them you how the usou 2 Frace 103 14				A. I assume so.
5 A. Yes. Forme people used fibre personal 6 532. O. Is here anything that is still 6 7 available, in electronic form, related to the businesses that we talked about that you are aware of? 7 9 0? A. Noto the best of my knowledge. 11 There might be some doi, of stuff from Sulfar training matrials 7 12 Point on one of my computers, but it would be training manual that the winess has? 1 13 Just while we are on it, have an urdertaking. 10 14 S33. MR, WARD: Okay, so, Counsel, could I 15 544. O. You have got Rail and the winess that can be recovered? 16 urdertaking. U/T 17 MR, GERRY: Sure. U/T 18 A. Mit WARD: A. Stellar Point, that e-mail was that can be recovered? 18 MR, GERRY: Oxay, we will give you that 24 A. Yes. 23 MR, GERRY: Oxay, we will give you that 24 A. Yes. 24 Prare 105 546. O. See-mail was always handled by 27 26 A. With email system Stellar Point think. 23 34 Prare 105 547. O. Interesting. And sex where 28 548		531. Q. And that was all deleted?	4	541. Q. You didn't see any others?
6 532. Q. Is there anything that is still 6 e-mails. but that was discourged. 7 available, in electronic form, related to the 8 b.sinesses that we talked about that you are aware 9 0 A. Not to the best of my knowledge. 7 542. Q. Okay, and who, d. Stellar Point, and 11 There might be some old, old stuff from Stellar 11 A. Imagine Chris would know. 12 Point on one of my computers, but it would be 12 543. Q. But was there an IT person there, 13 iundentaking to produce a copy of that, the 15 544. Q. You have got Raj at the top. Who 14 533. MR, WARD: UT 15 544. Q. You have got Raj at the top. Who 15 was the To person that we could speak to to try to maxis that the was and to there is any old Stellar 16 A.			5	A. Some people used their personal
7 available, in electronic form, Telated to the businesses that we taked about that you are aware of the sense that we taked about that you are aware of the sense that we taked about that you are aware of the sense that we taked about that you are aware of the sense that we taked about that you are aware of the sense that we taked about that you are aware of the sense taked about that you are aware of the sense taked about that you are aware of the sense take of the sense taked about that you are aware of the sense taked about that you are aware of the sense taked about that you are aware of the sense take of the sense take of the sense taked about that you are aware of the sense take of the sen		532. Q. Is there anything that is still		e-mails, but that was discouraged.
8 businesses that we taked about that you are aware of? 8 then you can tell me at Parof, would know the most about how e-mails were archived and might be 9 A. Not to the best of my knowledge. 11 A. Not to the best of my knowledge. 11 There might be some old, old stuff from Stellar training matrixels. 11 A. Imagine Chris would know. 12 Point one of my computers, built would be training matrixels. 11 A. There was 14 533. MR. WARD: Okay, so, Coursel, could I 14 A. There was 15 just, while we are on i, have an undertaking to produce a copy of that, the training matrixel har the writess has? 15 544. O. You have got Raj at the top. Who was the T person that we could speak to to try to was the T person that we could speak to to try to meta charters is any old Stellar 21 Point archived, electronic/sorm documents, that can be recovered? 23 546. Q. So e-mail was always handled by Parol, the e-mail 23 PM MR. WARD: R. J. Prire - 103 15 547. C. Interesting. And so who was the Parot person, apart from M. Smuth that ind IT knowledge that we can as speak to with a view to recovering the e-mail account? 1 PM MR. WARD: R. J. Prire - 103 15 547. C.	7		7	542. Q. Okay, and who, at Stellar Point, and
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	Sheet 28 Page 106 R. J. Pirie - 106		R. J. Pirie - 108
1	A. Correct.	1	many people no long had jobs?
2	552. Q. When did Greg take over Martin's		A. About 20.
3	responsibilities, approximately?	23	563. Q. Twenty, okay. So, first of all,
4	A. I want to say, maybe November,	4	what happened to theirto your knowledge, was
5	December.	5	there any instruction that was given to them with
6	553. Q. Of?	6	respect to preserving records, Banners Broker
7	A. 2014.		records?
8	554. Q. We have talked about your Banners	8	A. Not that I heard.
9	Broker electronic records and paper records and what	10	564. Q. And you continued on A. M'hmm.
10 11	happened to them, what about, you know, the paper	111	565. Qso when they left, can you tell
112	records of the people that worked beside you in the office, you must have some sense of how those people	12	me what happened to their office space, their
12 13	disposed of them.	13	computers?
14	A. These are programmers. Most of the	14	A. They were there.
15	stuff that they do is online or is on the computer.	15	566. Q. And are they still there?
16	Even if they take notes, they take notes on their	16	A. To the best of my knowledge.
14 15 16 17 18	computer.	17	567. Q. And we are talking, "there" being
18	555. Q. Okay, well, let's assume that it was	18	the Bayview premises, right?
19	on the computer, then. Did Martin or Chris Smith	19	A. Yes.
20	ever instruct them to delete their electronic files?	20	568. Q. And when was the last time you were
21	A. Not to the best of my knowledge.	21	at the Bayview premises?
22	556. Q. Do you know whether or not they did	22	A. On Monday.
23	delete their electronic files?	23	569. Q. Did you see the computers on Monday? A. M'hmm.
24 25	A. I don't know one way or the other. 557. Q. And the people working at Parrot	24	570. Q. And are there any servers or other
25			Page 109
\square	R. J. Pirie - 107		R. J. Pirie - 109
1	reduced itself at some point, around, I guess it	11	
		11	computer hardware that was used as part of the
	would be late August/September 2014, to about 13	1 2	computer hardware that was used as part of the Banners Broker operation, that is still at Bayview?
2 3	would be late August/September 2014, to about 13 people; correct?	1 2 3	computer hardware that was used as part of the Banners Broker operation, that is still at Bayview? A. I think so.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 18 9 20 21 22	 would be late August/September 2014, to about 13 people; correct? A. M'hmm. 558. Q. So the people that left, what happened to their A. They were laid off. 559. Q. No, but what happened to any files that were Banners Broker-related that they might have had? A. I know they left their computers behind. I don't know what would have been done with them, what was on them when they left. 560. Q. And we are talking about 30-or-so people, or is it more than that? A. Nonow, the people, most of whom were in that photo, those were the ones who worked on Banners Broker, of the 20-or-so that were let go, that's only four or five. Most of the other people worked on other projects. 561. Q. Right, but I mean, when Parrot stopped doing the Banners Broker support services, a 	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Banners Broker operation, that is still at Bayview? A. I think so. 571. Q. Like what, apart from the monitors? A. A lot of them used Macs, so it's the iMacs, and the MacBooks. A couple of guys used towers, PCs. 572. Q. Was there an intranet system there at all? A. Yes. 573. Q. And is that still there? A. I guess so, yes. 574. Q. I mean, it was therecertainly it was there as of Monday? A. Yes, certain as of Thursday, because I put in a vacation request. 575. Q. And you are going to be going back to Bayview tomorrow or A. That's the plan. 576. Q. Can you speak to Mr. Smith? You see him at Bayview from time-to-time? A. Yes.

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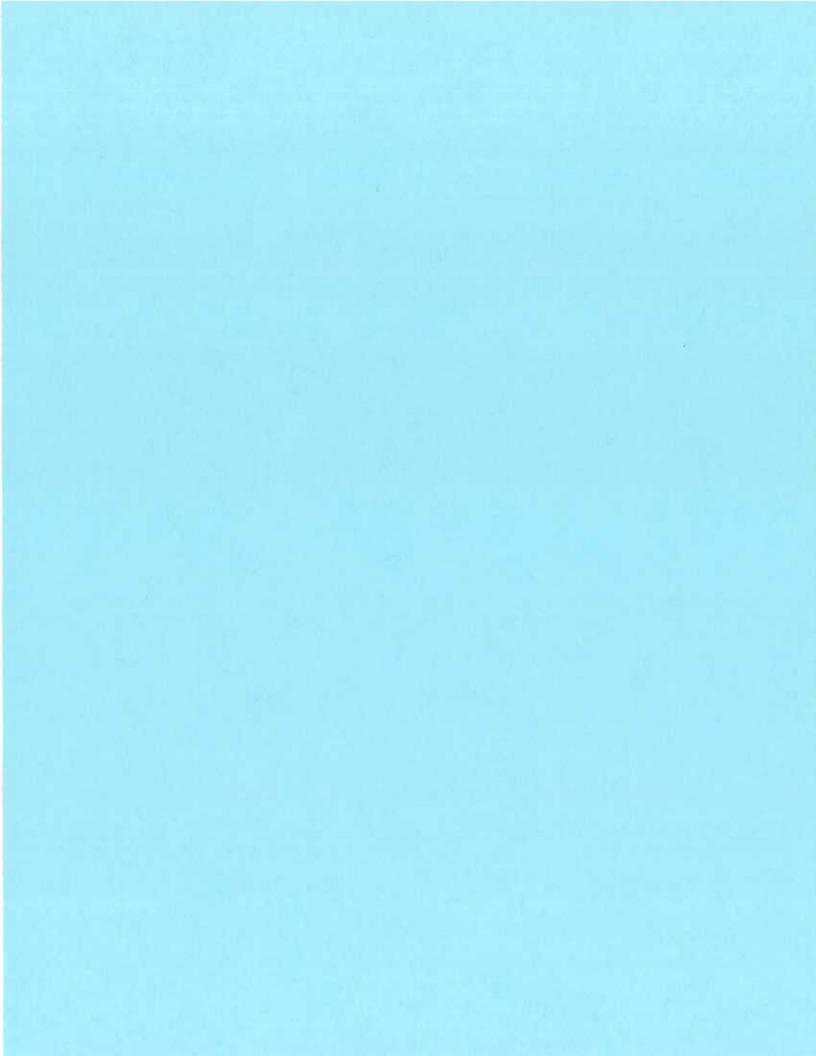
	_ Sheet 29 Page 110	- 422
1 2 3 4 5 6 7 8 9 10 11	R. J. Pirie - 110 578. Q. Can you speak to him and ask him not to remove those computers and towers? MR. GERRY: No, he is not going to do that, Counsel. /R 579. MR. WARD: Okay. MR. GERRY: You can certainly contact Mr. Smith yourself with any requests you have. BY MR. WARD: 580. Q. Can you let your lawyer know if you	R. J. Pirie - 1121Justice Matheson's order of August the222nd.334BY MR. WARD:5587.Q. Just a couple other things before we6finish off. The trip to theyour travel, let's7start with that. Because we know that you had a8couple trips to Belize.9A. Three.10588.Q. One to Trinidad.11A. M'hmm.
12 13 14 15 16 17 18 19 20 21 22 23 24 25	 see anybody removing the records of Banners Broker? MR. GERRY: Again, I am not sure what jurisdiction you have to ask my client to enforce your orders. 581. MR. WARD: It's the Receivership Order. MR. GERRY: But 582. MR. WARD: There is a duty to cooperate with the Receiver, and we are talking about records. MR. GERRY: You know, he will do whateverwhatever he has possession of, he will turn over to you. But I don't know he can control other people's actions. 583. MR. WARD: Just so you know, all we are 	 589. Q. Did you pay for any of those trips personally? A. No. 590. Q. Do you know who paid for those trips? A. No. I was given a ticket and told to be at the airport. 591. Q. Did you pay any expenses at all relating to any of that travel, yourself, personally? A. No. 592. Q. And similarly, with the trip to the Dominican Republic for the wedding, did you pay for that trip personally?
20	Page 111 R. J. Pirie - 111	Page 113 R. J. Pirie - 113
1 2 3 4 5 6 7 8 9 10 11	asking at this point is that he let you or me know if he sees someone removing the Banners Broker hardware. It's covered directly by the Receivership Order. Okay, so I will leave that with you, because I think it's clear enough, that you can read the Receivership Order and see that. And if that disappears, now, with us knowing that it's there as recently as Monday MR. GERRY: I don't think it's his obligation to preserve that material. He	1A. No.2593.Q. Why didn't you pay for that3personally?4A. Because I couldn't afford to at the5time. So Chris and I had a separate deal where I6would do some extra writing on top of what I was7already doing, and he would loan me the money to go8down.9594.Q. How much money did he loan you?10A. I am not sure, he took care of the11ticket.
12 13 14 15 16 17 18 19 20	can only preserve what's his. 584. MR. WARD: I will ask one more time, the request is that you let either myself or your counsel know if you see anyone removing the Banners Broker hardware at 1376 Bayview. MR. GERRY: And, Counsel, if he lets me know, what is my obligation?	12595.Q. And have you repaid him?13A. I am not sure. I don't think so, I14haven't given him a lump sum, but15596.Q. You haven't repaid him anything,16correct?17A. Correct, but theI was working it18off. It wasn't so much of ahe was going to19Ioangive me money and I had to give it back to
20 21 22 23 24 25	 585. MR. WARD: You would need to let the Receiver know. MR. GERRY: We are not going to agree to that, that's fine, thanks. /R 586. MR. WARD: So I would ask you to have a look, when we break, Counsel, at Madam 	 him. I just took on extra responsibilities to offset the cost. 597. Q. But you don't know what the cost was? A. Correct. 598. Q. And sitting here, you can't tell me

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Cheat 20 Daga 114		Page 1	116
R. J. Pirie - 114		raye.	R. J. Pirie - 116
 how much of that has been repaid? A. Yes, I believe it was about \$1,300. 599. Q. Do you believe that it wasso I assume it was Mr. Smith that paid for the trip, that 	1 2 3 4		THE WITNESS: They may be. MR. GERRY: If they are still in his possession, we will undertake to provide them. U/T
 is your understanding? A. I assume so. 600. Q. And when you say "Mr. Smith", do you mean him personally or are you referring to the Banners Broker company. 	5 6 7 8 9	607.	MR. WARD: Okay. And if we needed to make inquiries of CRA to get them, then the undertaking would extend to asking for an appropriate written consent limited to that tax statement, Counsel?
 A. I assume Chris Smith personally. 601. Q. Earlier on, at the very beginning of the day, when we were dealing with your compensation, I asked you specifically whether or 	10 11 12 13	608.	MR. GERRY: Limited to provision of the T4s, not the returns. MR. WARD: That's correct. MR. GERRY: Okay, we will give that
 14 not 15 A. You did and I forgot, I'm sorry. 16 602. Q. Okay, just for the record, I had 	14 15 16	609.	undertaking, to provide authorization if we can't provide them ourselves. U/T MR. WARD: And we would make thatthe
 askedI am going to ask again, because I want to make sure that nothing else is forgotten, but we really need to have a clear understanding of all aspects of your compensation, including monetary and 	17 18 19 20		authorization would be from the CRA. Okay, I have no further questions. Does anyone else have any questions? No. Thank you for your time.
 these trips that we are talking about as benefits. A. Okay. 			
24 603. Q. Okay, so thinking back on it now, 25 was there anything else that you received by way of			
Page 115	1	Page 1	17 R. J. Pirie - 117
R. J. Pirie - 115 compensation for the work that you did at Stellar Point or Parrot, apart from the salaries that are	1 2		INDEX OF EXHIBITS
 documented in the employment agreement and that you described for me, and these trips? A. I can't think of any gifts. I can't 	3 4 5 6 7	exhibit Numbei	
 think of anylike, there was no Christmas bonus. There was the trip to the Dominican. No hardware, nol can't think of anything. 	8 9 10 11	P1.	Employment Agreement dated 21 September 19, 2013, as between Parrot Marketing Inc. and Robert James Pirie
9 604. Q. So, is it fair, then, to say that 0 all of the Banners Broker-related compensation 1well, you tell me. I mean, were these amounts	12 13 14 15 16 17	P2.	3-page printout from 66 Renaissance Jones Productions re: film entitled "Big Fucking Deal"
 that you did receive, did someone issue a T4, for example, that would reflect what you received from the company? 	18 19 20 21 22	P3.	Printout of a BB blog 71 including series of transcripts of weekly webinars, blogs, et cetera
	24	P4.	Colour photocopy of colour 75 photographs depicting
5 A. Yes. 6 605. Q. Okay, and you filed them with your 7 income tax returns?	21 22 23 24 25 26 27 28 29		Robert Pirie wearing a toupee on trip to Trinidad giving a PowerPoint presentation
5 A. Yes. 6 605. Q. Okay, and you filed them with your 7 income tax returns? 8 A. Absolutely. 9 606. MR. WARD: We would like to have copies 0 of the Stellar Point and the Parrot	28 29 30 31	P5.	on trip to Trinidad giving
5 A. Yes. 6 605. Q. Okay, and you filed them with your 7 income tax returns? 8 A. Absolutely. 9 606. MR. WARD: We would like to have copies	28 29 30	P5. P6.	on trip to Trinidad giving a PowerPoint presentation Colour photocopy of 4 77 colour photos-in-one of Robert Pirie with different

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	_ Sheet 31	Page 118	R. J. Pirie	- 118	.Page 120 <u> </u>		R. J. Pirie - 120
1	INI	DEX OF UNDERTAI	KINGS	1 2	INC	DEX OF REFUSALS	
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15 16 17	5.	116	608	15 16 17 18 19	5. 6.	110 111	578 585
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1 2 3 4 5 6 7 8 9	INDEX REFERENCE NUMBER 1.	OF UNDER ADVIS PAGE NUMBER	QUESTION NUMBER	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20	Plea advisem their gui necessa Reportin	eby certify the fore tion of the above-n Y OF FEBRUARY, 2 lity and understand	any undertakings, objections, re provided as a service to all c not purport to be legally bindi e not binding upon Victory Verba going to be a true and accu oted proceedings held before me 2015, and taken to the best of my ing.
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Court File No. CV-14-10663-00CL

ONTARIO SUPERIOR COURT OF JUSTICE (Commercial List) IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1992, c.27,s.2, AS AMENDED AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE ISLE OF MAN WITH RESPECT TO BANNERS BROKER INTERNATIONAL LIMITED APPLICATION OF MILES ANDREW BENHAM AND PAUL ROBERT APPLETON, IN THEIR CAPACITY AS JOINT LIQUIDATORS OF BANNERS BROKER INTERNATIONAL LIMITED, UNDER PART XIII OF THE BANKRUPTCY AND INSOLVENCY ACT (CROSS-BORDER INSOLVENCIES)

GV/jlk

Examination by Receiver of TARA KAUR REEVES (nee Josun), taken at the offices of Cassels Brock & Blackwell, Suite 2100, Scotia Plaza, 40 King Street West, Toronto, Ontario, on the 26th day of February, 2015.

APPEARANCES: DAVID S. WARD ERIN CRADDOCK LARRY ELLIS

} -- Joint Liquidators of
 } Banners Broker
 } International Limited

and the Court-Appointed Receiver and all Banners Broker affiliated entities

ALSO PRESENT:

Gillian Goldblatt

-- Representative of

Trustee In Bankruptcy

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Sheet 2 Page 2	T. Josun
T. Josun - 2 INDEX OF PROCEEDINGS PAGE NUMBER TARA KAUR REEVES (nee Josun), sworn Examination by MR. WARD 3 - 128 Index of Exhibits 129 Certificate 130	 A. My full name is Tara Kaur Josun. My married name is Tara Kaur Reeves. 5. Q. And Kaur, how do you spell that? A. K-A-U-R. 6. Q. K-A-U-R. And what is your date of birth, please? 7 A. December 14th, 1989. 8 7. Q. '89? 9 A. '89. 10 8. Q. Okay. And your current address? 11 A. 2922 Gulfstream, G-U-L-F-S-T-E-A-M Way, Mississauga, Ontario. 13 9. Q. Mississauga, Ontario. 14 how long have you lived there for? A. I have been there since after my husband and I got married. Since June, end of June? 17 10. Q. Okay. Sure. Of last year? 18 A. Correct. Of 2014. 19 11. Q. Okay. And prior to that where were you living? 21 A. I was living with my mom.
	2212.Q.Okay. And what was that address?23A.62 William Stephenson2413.Q.Right.25ADrive in Whitby, Ontario.
Page 3 T. Josun - 3	T. Josun - 5
 TARA KAUR REEVES (nee Josun), sworn EXAMINATION BY MR. WARD: 1. Q. Good morning, Ms. Josun. A. Good morning. 2. Q. Just let me introduce who we have in the room today. Erin Craddock and I are counsel for the joint liquidators of a company called Banners Broker International Limited A. M'hmm. 3. Qand we are also counsel for the Canadian Receiver of Banners Broker International Limited and we are also counsel for the Canadian investigatory Receiver of Parrot Marketing Inc., Local Management Services, 2341620 Ontario Corporation, Stellar Point formerly operating as Banners Broker Limited, Dixit Holdings and any other entity operating under the business names, Banners Broker, Banners Broker Limited, Banners Mobile or Banners Broker Belize and so part of what we want to talk about today is those companies and so thank you for agreeing to come and meet with us today. A. No problem. Q. Okay. So just by way of 	 14. Q. Okay. And then last question in terms of addresses. Between February of 2012 and July 2012 when I understand that you were involved in Banners Broker, do you recall where you were living? A. I was living at home in Whitby. 15. Q. At home? And what was the address of the Whitby property? A. 62 William Stephenson. 16. Q. I got it. Okay. Okay. Thank you for that. And then finally, in terms of your education or college certificates or qualifications, can you just briefly tell me what you did in school? A. Okay. So I finished highschool and then I went to university for a little bit for a business degree. Dropped out. It wasn't what I wanted to do. 17. Q. Okay. A. I finished about three semesters and then I took 6 months off, worked full time at Tim Hortons. That's where I was working through school anyway and then I went to a private college, CDI and I did a 12 month paralegal program.

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	Shor	et 3 Page 6		Page	4 <i>L</i> /
	Snee	T. Josun - 6		rage	T. Josun - 8
1	19.		1		with Banners Broker until about July of 2012?
2	10.	A. The campus I went to was located in	2		A. That is correct. I would say, if
3		Ajax just off of the 401 and Westney.	23		anything, towards the end of July. We did an
4	20.		4		international convention in Portugal for two
5	20.	designation?	5		weeks
6		A. That was the early February. I	6	34.	
		graduated in February.		04.	Aand when we returned that's when
8	21.		8		Aanu when we returned that's when
	۷١.		9	35.	l quit.
9 10	00	A. 2012. Q. 2012.	10	55.	
	22.		111		A. So I would say, if anything, at the
11	00	A. M'hmm.		20	end of July, beginning of August at the latest.
12	23.		12	36.	
13		that takes care of the introductory questions.	13		about six months
14		What I want to turn to now is I just want	14	07	A. Correct.
15		to understand a little bit about your involvement	15	37.	
16		with Banners Broker and I'm aware that you were	16		throughout that six month period did you believe
17		cooperating with the Competition Bureau and that you	17		that you were working exclusively for Banners Broker
18		gave an interview to the Competition Bureau on April	18		International Limited or did your employer change at
19		the 11th of 2013?	19		some point?
20	~ (A. Yes, that sounds about right.	20		A. The employer did change. It was
21 22	24.		21		still Banners Broker. I went from working in our
22		a minute the evidence of what you told them	22 23		Toronto office to working at our Oshawa office with
23		A. M'hmm.	23		Raj. He was the head of that office and it was
24	25.		24		called Banners Broker Canada.
25		questions that I'm going to have for you today so	25	38.	Q. Okay. And when did you make that
	Page			Page	9
	Page	T. Josun - 7		Page	9 T. Josun - 9
1	Page	T. Josun - 7 they should be familiar to you but I want to put	1	Page	9 T. Josun - 9 office change approximately?
1 2	Page	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in	1	Page	 T. Josun - 9 office change approximately? A. Not too long into my employment.
3	Page	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in which you were involved	1 2 3	Page	 T. Josun - 9 office change approximately? A. Not too long into my employment. I'd say at the most maybe two and a half, three
3	-	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in which you were involved A. Yes, please.	1 2 3 4		 T. Josun - 9 office change approximately? A. Not too long into my employment. I'd say at the most maybe two and a half, three months in?
3 4 5	Page 26.	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in which you were involved A. Yes, please. Qwith Banners. Okay.	1 2 3	Page 39.	 T. Josun - 9 office change approximately? A. Not too long into my employment. I'd say at the most maybe two and a half, three months in?
3 4 5 6	26.	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in which you were involved A. Yes, please. Qwith Banners. Okay. A. It's been so long.	1 2 3 4		 ⁹ T. Josun - 9 office change approximately? A. Not too long into my employment. I'd say at the most maybe two and a half, three months in? Q. Is it fair to say around the Spring? A. Yes. It was around summertime, May,
3 4 5 6 7	-	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in which you were involved A. Yes, please. Qwith Banners. Okay. A. It's been so long. Q. Okay. So I have a note that you may	1 2 3 4 5 6 7	39.	 ⁹ T. Josun - 9 office change approximately? A. Not too long into my employment. I'd say at the most maybe two and a half, three months in? Q. Is it fair to say around the Spring? A. Yes. It was around summertime, May, June.
3 4 5 6 7 8	26.	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in which you were involved A. Yes, please. Qwith Banners. Okay. A. It's been so long. Q. Okay. So I have a note that you may have started at Banners Broker in February of 2012?	1 2 3 4 5 6 7 8		 ⁹ T. Josun - 9 office change approximately? A. Not too long into my employment. I'd say at the most maybe two and a half, three months in? Q. Is it fair to say around the Spring? A. Yes. It was around summertime, May, June. Q. Okay. And in May or June your
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3 4 5 6 7 8 9 10	26. 27.	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in which you were involved A. Yes, please. Qwith Banners. Okay. A. It's been so long. Q. Okay. So I have a note that you may have started at Banners Broker in February of 2012? A. Correct. It was the job I got right out of school.	1 2 3 4 5 6 7 8 9 10	39.	 ⁹ T. Josun - 9 office change approximately? A. Not too long into my employment. I'd say at the most maybe two and a half, three months in? Q. Is it fair to say around the Spring? A. Yes. It was around summertime, May, June. Q. Okay. And in May or June your office moved from which address in Toronto? A. I honestly could not tell you the
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	 26. 27. 28. 29. 30. 31. 32. 	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in which you were involved A. Yes, please. Qwith Banners. Okay. A. It's been so long. Q. Okay. So I have a note that you may have started at Banners Broker in February of 2012? A. Correct. It was the job I got right out of school. Q. Okay. A. Can I say names or Q. Yes, please. Yes. A. Okay. So I was employed by Raj. He was the one who interviewed me and he was the one who hired me. Q. Okay. And Raj, you mean Raj Dixit? A. Rajiv Dixit. Correct. Q. And so again, just thinking about timelines, this was February 2012. A. M'hmm. Q. Which company were you hired by? A. I'm pretty sure it was Banners	$\begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 1 \\ 1 \\ 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 1 \\ 1 \\ 1 \\ 2 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1$	 39. 40. 41. 42. 43. 44. 	 T. Josun - 9 office change approximately? A. Not too long into my employment. I'd say at the most maybe two and a half, three months in? Q. Is it fair to say around the Spring? A. Yes. It was around summertime, May, June. Q. Okay. And in May or June your office moved from which address in Toronto? A. I honestly could not tell you the exact address. Q. Sure. A. It was just off of Jarvis. Queen and Jarvis Q. Okay. Ado they cross? Q. Was it on Jarvis Avenue your office? A. It was the Jazz building so it was like in a Q. Okay. But you think it was on Jarvis Street? A. For sure it was off of Jarvis and Queen. I would say there's the Second Cup in the
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 26. 27. 28. 29. 30. 31. 32. 	T. Josun - 7 they should be familiar to you but I want to put some timelines first of all around the period in which you were involved A. Yes, please. Qwith Banners. Okay. A. It's been so long. Q. Okay. So I have a note that you may have started at Banners Broker in February of 2012? A. Correct. It was the job I got right out of school. Q. Okay. A. Can I say names or Q. Yes, please. Yes. A. Okay. So I was employed by Raj. He was the one who interviewed me and he was the one who hired me. Q. Okay. And Raj, you mean Raj Dixit? A. Rajiv Dixit. Correct. Q. And so again, just thinking about timelines, this was February 2012. A. M'hmm. Q. Which company were you hired by? A. I'm pretty sure it was Banners Broker International that I was hired with.	$\begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 0 \\ 11 \\ 12 \\ 3 \\ 14 \\ 5 \\ 16 \\ 7 \\ 18 \\ 9 \\ 20 \\ 12 \\ 22 \\ 22 \\ 22 \\ 22 \\ 22 \\ 22$	 39. 40. 41. 42. 43. 44. 	 T. Josun - 9 office change approximately? A. Not too long into my employment. I'd say at the most maybe two and a half, three months in? Q. Is it fair to say around the Spring? A. Yes. It was around summertime, May, June. Q. Okay. And in May or June your office moved from which address in Toronto? A. I honestly could not tell you the exact address. Q. Sure. A. It was just off of Jarvis. Queen and Jarvis Q. Okay. Ado they cross? Q. Was it on Jarvis Avenue your office? A. It was the Jazz building so it was like in a Q. Okay. But you think it was on Jarvis Street? A. For sure it was off of Jarvis and

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	She	T. Josun - 10		ruge	T. Josun - 12
1	45		1		hired you in February, 2012
2		Aa couple intersections down.	2		A. M'hmm.
3	46		3	58.	Qwere you hired for a specific
4		Church?			position?
5		A. All I remember was the Jazz	456		A. So initially when I was hired it was
6		building. I'm terrible with directions.	6		to strictly just work out of the Toronto office. My
7	47		7		hours were just shortly after rush hour traffic,
8		office moved to which location?	8	50	like ten to 6:00
9	40	A. In Oshawa off of Wellington?	9	59.	
10	48		10		Abecause I was commuting all the
11 12		A. Just off of Wellington. That was	12	60.	way from Whitby. Q. Right.
13	49	the major street. Q. Off the record for a sec.	13	00.	A. And I was basically just sitting in
14	43		14		front of a computer and I was doing tech support,
14 15		DISCUSSION OFF THE RECORD	15		customer service, that type of thing, all strictly
16			16		through e-mail.
17	ΒY	(MR. WARD:	17	61.	Q. Were you a CSR? Was that your job
18	50		18		title at that point?
19		A. Correct.	19		A. CSR, customer service
20	51		20	62.	Q. Customer Service Representative?
21		the name of your employer changed around that time	21		A. Yes. You could put that as the
22		as well.	22	0	title.
23		A. Just from Banners Broker	23	63.	
24 25	52	International to Banners Broker Canada. Correct. Q. Okay. Did you at any point have a	24 25		particular job title? A. At that point, no. There was no
20				Deee	
	rage	T. Josun - 11		raye	T. Josun - 13
4					1.0500-031
			1		
2		written employment contract?	1 2	64.	particular job title.
23		written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office	1 2 3	64.	particular job title.
3		written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the	34	64.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker
3 4 5		written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago.	3 4 5		particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada
3 4 5 6	53.	written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"?	34	64. 65.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right.
3 4 5 6 7		written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like.	3 4 5 6 7		particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff
3 4 5 6 7	53. 54.	written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right.	3 4 5 6 7 8	65.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer.
3 4 5 6 7 8 9		 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was 	3 4 5 6 7 8 9		particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer.
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3 4 5 6 7 8 9 10 11		 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was the HR gentleman they brought on and he was the one who implemented the policies, procedures, employee 	3 4 5 6 7 8 9 10 11	65. 66.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer. A. That office was strictly 24 hour customer service.
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3 4 5 6 7 8 9 10 11 12 13		 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was the HR gentleman they brought on and he was the one who implemented the policies, procedures, employee contracts, jobs, duties, titles and that type of stuff, so I believe that's when I signed paperwork. 	3 4 5 6 7 8 9 10 11 12 13	65. 66. 67.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer. A. That office was strictly 24 hour customer service. Q. Okay. A. Three shifts, morning, afternoon,
3 4 5 6 7 8 9 10 11 12 13		 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was the HR gentleman they brought on and he was the one who implemented the policies, procedures, employee contracts, jobs, duties, titles and that type of stuff, so I believe that's when I signed paperwork. 	3 4 5 6 7 8 9 10 11 12	65. 66. 67.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer. A. That office was strictly 24 hour customer service. Q. Okay.
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	54. 55.	 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was the HR gentleman they brought on and he was the one who implemented the policies, procedures, employee contracts, jobs, duties, titles and that type of stuff, so I believe that's when I signed paperwork. Before then I don't think I signed any paperwork. Q. Okay. But at some point you signed employment paperwork? A. I did. 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	65. 66. 67.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer. A. That office was strictly 24 hour customer service. Q. Okay. A. Three shifts, morning, afternoon, evening. Q. Okay. And when you left in the end of July 2012 when you quit, were you still employed as a staff trainer?
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	54. 55.	 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was the HR gentleman they brought on and he was the one who implemented the policies, procedures, employee contracts, jobs, duties, titles and that type of stuff, so I believe that's when I signed paperwork. Before then I don't think I signed any paperwork. Q. Okay. But at some point you signed employment paperwork? A. I did. Q. And do you have that employment paper work? No? 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	65. 66. 67. 68.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer. A. That office was strictly 24 hour customer service. Q. Okay. A. Three shifts, morning, afternoon, evening. Q. Okay. And when you left in the end of July 2012 when you quit, were you still employed as a staff trainer? A. Was I employed at thatyes. I was employed as a staff trainer. We went and did the
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20	54. 55.	 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was the HR gentleman they brought on and he was the one who implemented the policies, procedures, employee contracts, jobs, duties, titles and that type of stuff, so I believe that's when I signed paperwork. Before then I don't think I signed any paperwork. Q. Okay. But at some point you signed employment paperwork? A. I don't keep it. There were 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	65. 66. 67. 68.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer. A. That office was strictly 24 hour customer service. Q. Okay. A. Three shifts, morning, afternoon, evening. Q. Okay. And when you left in the end of July 2012 when you quit, were you still employed as a staff trainer? A. Was I employed at thatyes. I was employed as a staff trainer. We went and did the convention in Portugal, came back.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	54. 55.	 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was the HR gentleman they brought on and he was the one who implemented the policies, procedures, employee contracts, jobs, duties, titles and that type of stuff, so I believe that's when I signed paperwork. Before then I don't think I signed any paperwork. Q. Okay. But at some point you signed employment paperwork? A. I don't keep it. There were employee files. There were two ladies, secretaries 	3 4 5 6 7 8 9 10 11 12 13 14 15 6 17 18 9 20 21	65. 66. 67. 68.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer. A. That office was strictly 24 hour customer service. Q. Okay. A. Three shifts, morning, afternoon, evening. Q. Okay. And when you left in the end of July 2012 when you quit, were you still employed as a staff trainer? A. Was I employed at thatyes. I was employed as a staff trainer. We went and did the convention in Portugal, came back. Q. Right.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 20 21 22	54. 55. 56.	 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was the HR gentleman they brought on and he was the one who implemented the policies, procedures, employee contracts, jobs, duties, titles and that type of stuff, so I believe that's when I signed paperwork. Before then I don't think I signed any paperwork. Q. Okay. But at some point you signed employment paperwork? A. I don't keep it. There were employee files. There were two ladies, secretaries and assistants of Raj's that kept all the paper work 	34567891011213141516718920122	65.66.67.68.69.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer. A. That office was strictly 24 hour customer service. Q. Okay. A. Three shifts, morning, afternoon, evening. Q. Okay. And when you left in the end of July 2012 when you quit, were you still employed as a staff trainer? A. Was I employed at thatyes. I was employed as a staff trainer. We went and did the convention in Portugal, came back. Q. Right. A. I finished off my last training
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 20 21 22	54. 55. 56. 57.	 written employment contract? A. There was an HR gentleman that they brought on when the Banners Broker Canada office opened up. His name is Grant. I can't remember the last name. It's so long ago. Q. Dell? Start with a "D"? A. I can tell you what he looks like. Q. Right. A. I don't remember the name. He was the HR gentleman they brought on and he was the one who implemented the policies, procedures, employee contracts, jobs, duties, titles and that type of stuff, so I believe that's when I signed paperwork. Before then I don't think I signed any paperwork. Q. Okay. But at some point you signed employment paperwork? A. I don't keep it. There were employee files. There were two ladies, secretaries and assistants of Raj's that kept all the paper work 	34567891011213141516718920122	65.66.67.68.69.	particular job title. Q. At some point was there a particular job title that you were assigned? A. When I moved to Banners Broker Canada Q. Right. Athe Oshawa office, I was a staff trainer. Q. Staff trainer. A. That office was strictly 24 hour customer service. Q. Okay. A. Three shifts, morning, afternoon, evening. Q. Okay. And when you left in the end of July 2012 when you quit, were you still employed as a staff trainer? A. Was I employed at thatyes. I was employed as a staff trainer. We went and did the convention in Portugal, came back. Q. Right. A. I finished off my last training

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	Silee	et 5 Page 14T. Josun - 14		uye	T. Josun - 16
1		were a staff trainer?	1	82.	
2		A. Correct.	2		Athen we basically
3	71.	Q. Okay. And when you began at the	3	83.	Q. And was it
45		beginning in Toronto at the Church Street office,	4		Ajust gave them the information.
		the Jazz building	5	84.	
6		A. M'hmm.	6		contacting you, were they affiliates?
	72.		7		A. Yes.
8		your responsibilities were, like everything you did	8	85.	
9		at that time. So you mentioned that you were	9	00	A. Affiliates from around the world?
10		working from a computer?	10	86.	
11	70	A. M'hmm.	11	87.	A. All over the world
12	73.		12	0/.	
13 14		of things that you would do. A. So they had two rooms down the hall	14	88.	Aworld. Q. Okay.
15		from each other. I was in one. Then the	15	00.	A. Internationally.
16		programmers andcan I name drop?	16	89.	Q. And were they contacting you by
16 17	74.		17	00.	phone or over the e-mail?
18	, , ,	A. So there were the programmers,	18		A. I would say at least 90 percent was
19		Matthew, Lynn and Harrison. I cannot remember his	19		strictly e-mail.
20		last name.	20	90.	Q. I see.
21	75.		21		A. The odd phone call would come in.
22		A. He was only there for a short while	22	91.	Q. Okay. E-mails. Great. And so
23		while I was there. And then, Chris Smith. They	23	• • •	apart from that customer affiliate servicing that
20 21 22 23 24		worked out of that one	24 25		you did, was there anything else that was involved
25	76.	Q. Okay.	25		in your job at this time?
	Page		<u> </u>	Page	
		T. Josun - 15	4		T. Josun - 17
1		Aand then myself, Christelle and	2		A. So I probably there for about a month, two months and then I did some traveling
23		Johnny worked out of this one. Basically, there	23		where I was on the road tech support I guess you
4		were like the fold out plastic tables, two of them			could say. Basically what I did was when I traveled
5	77.	side-by-side, back-to-back. Q. Right.	5		I would sit at the back of the seminars
6	11.	A. She sat on one side. She was the	6	92.	Q. Right.
7		one who trained me. I sat on the other side right	7	JL.	Aand as questions were being asked
8		across from her and Johnny was the graphic designer.	8		during the seminar I was writing them down
9		Her was the one who sat beside me.	9	93.	Q. M'hmm.
10	78.	Q. Okay.	10		Ago straight back to my hotel
11	, 01	A. And then basically, as the enquiries	11		room. I would e-mail Johnny, Matthew, Harrison,
12		came inthe majority of the stuff was	12		Chris, all the programmers, being like, "Listen, 80
13		regardingoh, my gosh. I don't even know all the	13		percent of the problem is this, 20 percent of the
14		proper terminology. I can't remember any of it.	14		problem's this, 10 percent of the problem is this."
15	79.	Q. M'hmm.	15		so and so forth and they would justand the next
16		A. The bars weren't moving	16		webinar would come up the next they, then they would
17	80.	Q. Sure.	17		address those questions.
18		Aor they weren't seeing anything	18	94.	Q. Got it. Okay. And during the
19		getting produced or anything like that wasn't coming	19		period that you were traveling, how long did that
20		in, or the thing froze, or they got locked out of	20		last for?
21		the account, how do they get back in. Anything that	21	~ ~	A. Didn't last long.
22		was like that, we had scripts, I guess	22	95.	Q. Okay.
23	81.	Q. I see. Sure. Sure.	23		A. I was probably doing at the most
22 23 24 25		Alike answers already that were	24		maybeI think I two rounds of the first one was
25		preconstructed from the programmers and	25		the longest one.

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	Sheet 6 Page 18		Page 20
	T. Josun - 18		T. Josun - 20
1	96. Q. Right.	1	113. Q. Okay. And who traveled with you the
2	A. I think it was a three week trip.	2	second time around?
3	Came back. Went back again. I think at the most it	3	A. Again, it was Kuldip Josun.
4	was about six or seven weeks I was	4	114. Q. Okay. And anybody else?
5	97. Q. Okay.	5	A. There was my brother. He just had
6	Aoverseas.	6	vacation time off.
7	98. Q. Six or seven weeks	7	115. Q. Okay. And what's your brother's
8	A. And then I stopped.	8	name?
9	99. Qoverseas. Okay.	9	A. Arjun Josun.
10 11	A. I had a long term boyfriend and	10	116. Q. Á-R A. J-U-N.
12	everything like that. I just wasn't ready for	12	117. QJ-U-N. Okay. And was Arjun
13	traveling 100. Q. Okay.	13	employed by Banners Broker
14	Aand being away that long.	14	A. No. No.
15	101. Q. Yes. Six or seven weeks is quite	15	118. Qat that time?
16	a	16	A. Not at all.
17	A. M'hmm.	17	119. Q. Okay. All right. And I know later
18	102. Qtrip. So the first of the trips,	18	on you were involved in organizing a convention in
19	tell me about who went with you and where you went.	19	Portugal?
20	A. The first of the trips wasoh, my	20	A. That would be my third overseas
20 21 22	goodness. We went to Portugal, Ireland and U.K	21	trip
22	103. Q. Right Okay.	22	120. Q. Okay.
23	A. We had hosts there. They were the	23	Awas for the convention. It was
24	ones that set up the presentations, the seminars I	24 25	the company convention. 121. Q. Okay. But the company conventions
25	guess you could say.	L	121. Q. Okay. But the company conventions
	Page 19 T. Josun - 19		T. Josun - 21
1	104. Q. Sure.	1	are different from the first two trips where I take
	A. And then that would be about it.	2	it they were seminars? What exactly was going on
23	105. Q. Okay. And who traveled with you?	3	the first two trips when you traveled around to
4	A. Kuldip Josun.	4	these countries?
5	106. Q. Sorry. Could you repeat?	5	A. From my understanding, what it was
6	A. Kuldip Josun, K-U-L-D-I-P.	6	was that the affiliates overseas wanted to speak
7	107. Q. Okay. Josun. Anybody else?	7	with somebody, wanted somebody to come and talk to
8	A. For that first trip, no. Nobody.	8	them and explain the program and just make sure it
9	108. Q. Okay. And Kuldip Josun is your	9	was real
10	father?	10 11	122. Q. Sure. AI guess. You know what I mean?
11 12	A. Correct. 109. Q. Okay. And now for the second trip,	12	AI guess. You know what I mean? Like something that wasjust not like somebody's
13	where did you go and who traveled with you?	13	pulling it out of there
14	A. The second trip wasokay, I'm	14	123. Q. Sure. Sure.
15	trying to remember here. Cypress, Belgium, went	15	Abehind.
16	back to Portugal. Sorry. I'm just thinking.	16	124. Q. Right. Okay.
17	110. Q. No. That's fine. It's not a test.	17	A. So that's where Kul, as the
18	Just	18	affiliates know him
19 20	A. It was	19	125. Q. Right.
20	111. Qas best as you can remember.	20	Athat's where he was the face
21 22 23	Aso long ago.	21	of
22	112. Q. Just as best as you can remember,	22	126. Q. Banners Broker?
23	right?	23	A. M'hmm.
24 25	A. Belgium, Cypress, Portugal. I'm sorry. That's all I can	24 25	127. Q. Okay. A. He was that person that they could
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Sheen 2 T. Josun - 22 1 T. Josun - 22 1 T. Josun - 22 1 touch and feel and actually talk to and they knew it was and the scanse guy. He never wanted to be seen. He was only heard T. Josun - 24 1 was read. And then. Chine was the basis in the scanse guys in that serse T. Josun - 24 1 was read. And then. Chine was the was only heard T. Josun - 24 1 was read. And then. Chine was the was need was and people would come or would you thread the was the wa				
1 touch and feel and actually talk to and they knew if was real. And then, Chris was the ehrind the scenses guy. He never warted to be seen. He was only heard 1 2 guy. He never warted to be seen. He was only heard 1 138. Q. Sure. 3 128. Q. Sure. 138. Q. Sure. 138. Q. Sure. 6 Aover the webinars. That was it. 1 3. Q. Okay. 7 dad, Kul, to for instance, Portugal or Ireland. 140. Q. So tell me what a still trainer at the Melson office data trainer at trainer at trainer? 11 around the country having the seminar as with the around the country that was it. 140. Q. So tell me what a still trainer at the Melson office data trainer at trainer? 128. A. No. Not too much over the country that was it. 141. Q. Right? 141. Q. Right? 138. Q. Okay. A. And then back for a week and then that was it. 131. Q. Okay. 141. Q. Right? 139. Q. Okay. A. Other than the aza building, there was the artilitize trainer and the towas the artininer attowas the artilititing trainer at the articit	[Page 24T .losun - 24
2 was real. And then, Chris was the behind the scenes 118 Little bit more sawy I guess in that sense 3 guy, He never wanted to be seen. He was only heard 138. Q. Sure. 5 Aover the webinars. That was it. 139. Q. Okay. 7 139. Q. Okay. Sure. Sure. 6 Aover the webinars. That was it. 130. Q. Okay. 7 dad. Kul to for instance, Portugal or reland. 130. Q. Okay. 9 would there be one seminar in each country that was in each country that was in the country having the seminars with the 140. Q. So tell me what a staff trainer at the Netson office did. Like what do you do every day when you came in to the Netson office as a staff 11 trainer? A. No. No too much over the country. 14 A. Interse would be one or two venues and one to one yous somes and that was it. 140. A. Interse was noway. So that's when the coundary. 130. Q. Okay. A. And then back for a week and then the four days. 141. A. Interse would be one or two venues and one the out days. 142. A. Interse would be one or two venues and one the out days	1		1	
3 guy, He never wanted to be seen. He was only heard 3 138. Q. Sure. 5 128. Q. Sure. Sure. Aand he just wanted to 6 Aand he just wanted to 139. Q. Sure. 7 129. Q. Sure. 139. Q. Sure. 8 Hold fore be one seminar in each contrupt that was it. 139. Q. Okay. 10 would there be one seminar in each contrupt that was it. 140. Q. So tell me what a staff trainer at the lost ond fore doit. Like what dd you devery day when you came in to the Nelson office at a staff trainer at trainer? 11 around the country that was it. 140. Q. So tell me what a staff trainer at trainer at the lost of one or would you travel around the country that was it. 12 A. No Not too much over the country that was it. 140. Q. It was strictly customer service 13 A. No. Not too much over the country that was it. 141. Q. It was strictly customer arounce and more and once or mow optics was the strictly that was it. 14 There would be the have they was the strictly customer arounce and more and once or mow optics. 1411. Q. Right. 15 that was it. 1414. Q. Right. 1414. Q. Right. 16 <td>0</td> <td>was real. And then Chris was the behind the scenes</td> <td>11 5</td> <td>little hit more sawy I quess in that sense</td>	0	was real. And then Chris was the behind the scenes	11 5	little hit more sawy I quess in that sense
4 Aand he just wanted to 5 128. Q. Sure. 6 Aover the webinars. That was it. 7 129. Q. Sure. So when you want with your 7 dad. Kul, to for instance, Portugal or lead. 9 would there be one seminar in each country that was in 9 organzed and people would ocome or would you travel 11 around he country having the seminars with the 12 affiliates? 13 No. Not too much over the country 14 there would be one or two unes and one 16 ord asy, three, four days, three two repossibilities were when you were at 13 Q. Okay. 14 A mothen back for a week and then 15 back out again, three, four days, three, four days, three, four days, three, four days, three two areas on the four days, three two areas the fillet base areas the still as and the still as an ananageria positility as and the still as an ananageria positility as and the still as an ananageria positility as and the two terms of understanding the there was the atfillate base areas and that was it. 132. Q. Ore		was real. And then, of its was the behind the scenes		
5 128. Q. Sure. 5 139. Q. Okay. 6 129. Q. Sure. Serve from the webinars. That was it. 6 130. Q. Okay. 7 129. Q. Sure. Serve from the webinars. That was it. 6 Apick my brain a little bit, have 8 would there be enseminar in each country that was it. 140. Q. So tell me what a staff trainer at 12 affiliates? A. No. Not too much over the ountry 14 140. Q. So tell me what a staff trainer at 13 A. No. Not too much over the ountry 14 111 140. Q. So tell me what a staff trainer at 14 affiliate base grow, more and people would come or would you travel 120 A. It was strictly oustomer service 15 that was.t. 14 filiate base grow, more and more enquices wee 14 16 thousands or e-mails, hundreds or e-mails coming in. Fight? 141. Q. Right. 17 Jays, three, four days. 14 filiate base grow, more and more enquices wee 14 18 140. Q. Right. 141. Q. Right. 19 A. And thares at. It was three. four days.				
6 Aover the veoinars. That was it. 7 129. Q. Sure. So when you went with your 8 dad, Kui, to for instance, Portugal or Ireland, 9 would there be one seminar in each country that was 10 Q. So tell me what a staff trainer at 9 would there be one seminar in each country that was 11 affiliates? 12 atfiliates? 13 A. No. No too much over the country 14 there would be the hosts, mainly where they lived in 15 that was it. 16 that was. 17 days, three, four d				
7 Page 23 C. Sure, So when you went with your dad, Kul, to for instance, Portugal or Ireland. 140. Q. So tell me what a staff trainer at the Nelson office at a staff trainer at the number of employees. Public the the staff trainer at the Nelson office at a staff trainer at the two staff trainer at the Nelson office at a staff trainer at the Nelson office at a staff trainer at the two staff trainer at the twas staff trainer at at the two staff trainer at the two staff tra				
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25 guess you could say, even though I didn't obviously 125 I would approach Rai and then he would	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22 23	T. Josun - 23 servicing, the tech support? A. Correct. 132. Q. And then there was the travel component? A. Where I was on the road 133. Q. On the road. Atech support. M'hmm. 134. Q. Yes. Was there anything else that you did for Banners during this time frame? A. Other than the Jazz building, the traveling and the staff trainer, that was it. 135. Q. Okay. And you became a staff trainer later on when you moved to 119 Nelson. Right? A. So again from my understanding, what happened was Raj became in a managerial position 136. Q. Sure. AI guess you could say and they wanted more of a corporate head office where people could come and actually visit if they wanted to so that's where the Nelson office came into play. 137. Q. M'hmm.	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\1\\1\\1\\2\\1\\4\\1\\5\\16\\7\\1\\8\\9\\2\\1\\2\\2\\2\\2\\3\end{array}$	 T. Josun - 25 including myself, the staff trainer and the two girls that worked with Raj as 143. Q. Okay. Aassistants, executive assistants, receptionist, that type of role. 144. Q. And this was all out of the Nelson office, right? A. Correct. 145. Q. And did you, as a staff trainer, did you supervise the staff that were actually having the contacts with the affiliates? A. Initially in the beginning 146. Q. Right. Aobviously I was overlooking them when we finished the training and then they started and I was just 147. Q. Right. Akind of a floater just walking around making sure if they had any questions or if they came into a road bump, if I could answer the question I would. Again, obviously materials were all provided to me. There was a booklet given. Materials or pop quizzes during the training.
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	Sheet 8 Page 26		- Page 28
—	T. Josun - 26		T. Josun - 28
1	148. Q. Sure.	11	158. Q. Right.
2	Ahe either call Chris or the	2	A. They're asking this, they're asking
3	programmers and get the answer and if there was no	$ \bar{3}$	that. He's like, don't worry, I'll take care of it.
- 4	answer to give then	4	
5	149. Q. Okay. Okay. And so I understand	5	159. Q. Sure.
6	that and in addition to that sort of supervision,		Aaddress it on the webinar. I'll
7	was there anything else that you did as a staff		take care of it. I'll address it on the webinar.
8	trainer when you were at Nelson? Were you involved	8	So then
9	in any other aspect of Banners Broker's business?	9	160. Q. Right.
10	No?	110	Athat's what I would say, like
11	A. No.	111	please tune into the webinar
12	150. Q. Okay. So you didn't deal with	12	161. Q. Right.
13	determining who would be paid out from their	13	Ablah blah blah and that was my
14	investments in the Banners Broker business?	14	answer over and over and over and over again.
15	A. Paid out?	15	162. Q. But more fundamentally, like what
16	151. Q. Well, maybe we should start this	16	was being sold? What did the company do? What did
17	way. What did you understand the Banners Broker	17	it produce?
18	business to be at this time?	18	A. So the way it was explained was that
19	A. At the time? Sorry.	19	it is advertising where, you know, when you go onto
20	152. Q. Well let's begin at the start then	20	Facebook. The way the company works, the majority
21	when you are in the Jazz building	21	
22	A. M'hmm.	22	of the money comes in is from 163. Q. Riaht.
23	153. Qon Church.	22	
23		23	Aand banners and the advertising.
25		24	164. Q. Right.
			A. So basically Banners Broker was
	Page 27 T. Josun - 27		Page 29 T. Josun - 29
1	the company was?	1	
2	A. Very difficult concept. Very	2	supposed to be for the average Joe, somebody who wanted toeither an entrepreneur of kind of grow
3	difficult concept to even comprehend, to understand.	3	their business without spending too much monoy but
4	It just seemed too good to be true. If you really	4	their business without spending too much money but
5	it just seemed to good to be true. If you really	5	also getting some revenue back from it, as well,
	just looked at the broad picture it was like this is		well they were able to upload 165. Q. M'hmm.
6	too good to be true. Anything that's too good to be	6	
	true is always in real life, in society, that's not		Atheir designs and of course it
8	howyou go to work, you work 9 to 5, all that kind	8	all went through the programmers where they
9	of stuff.	9 10	approved, obviously, so no explicit
10 11	155. Q. Right. Right.	11	166. Q. Sure.
	A. But the way that the set up was they		Ainformation like medication or
12	had offices, they had employees, they had the	12	pornography or
13	programmers, they had everybody. They had all this	13	167. Q. Right.
14	type of stuff. It took me a while to understand it	14	Aanything like that was being let
15	a little bit and again, everything else was given to	15	through.
16	me. It was all written down paperwork, answers to	16	168. Q. Right.
17	say, explanations for this, for that, all that kind	17	A. And then if they approved your
18	of stuff so I didn't really have to learn it too too	18	banner it would get uploaded and then you had
140	much or understand it beyond a certain point really.	19	169. Q. Okay.
19		12()	A. It worked and so I'm trying to
20	156. Q. M'hmm.	01	170 O No The Haffer
20 21	A. Where I got to a point where I had	20 21	170. Q. No. That's fine.
20 21 22	A. Where I got to a point where I had no answers for something I would obviously go to	22	170. Q. No. That's fine. Atalk with my hands and nobody
20 21 22 23	A. Where I got to a point where I had no answers for something I would obviously go to Chris and be like, what's the answer?	22 23	170. Q. No. That's fine. Atalk with my hands and nobody can
20 21 22 23	A. Where I got to a point where I had no answers for something I would obviously go to	22	170. Q. No. That's fine. Atalk with my hands and nobody

	Object O Demo 20		De
	Sheet 9 Page 30 T. Josun - 30		Page 32 T. Josun - 32
1	the blank space comes and each time you moved to a	1 1	186. Q. That it was in the nature of a ponzi
	different link or a different web page your happer		
2	different link or a different web page your banner		scheme or a pyramid scheme.
3	would come up	3	A. Okay.
4	172. Q. Okay.	4	187. Q. Did you ever personally come that
5	Aand then the next link then this	5	conclusion that it may have been
6	person's banner would come up. So each one got a	6	A. I honestly was so
7	little bit, little bit, little bit. And then there	7	188. Qa ponzi scheme?
8	were the visuals, the bars. I don't even remember	8	Anaive. I was a student. I was
9	the names and terminology.	9	young. I was probably 20 years old. This was my
10	173. Q. Did you go on and try it yourself?	110	first, I guess you could say, full time real job
11	A. No.	11	other than fast food.
12	174. Q. No?	12	189. Q. Right.
13	A. Employees were not allowed to have	13	A. So I was a little naive I guess you
14	accounts.	14	could say in that sense
14 15	175. Q. Okay. And did you believe it to be	15	190. Q. Sure.
16	a real business?	16	Awhere again I just saw
17	A. Well I mean it was all there in	17	191. Q. Right.
18	front of me. Like I said	18	
19		19	Apeople coming and going. There
20		20	was an office. There was this and I was working in
20	Aoriginally the way it was		the city and
21	explained to me just talking face-to-face, I'm like	21	192. Q. Yes. Yes.
22	that's too good to be true.	22	Aall that kind of stuff.
23	177. Q. Right.	23	193. Q. So right up until the time that you
24	A. How does it just happen? But then	24	quit did you ever have a strong sense that something
25	again, when I saw the process and I met the	25	was off?
		! L <u></u>	
	Page 31		Page 33
	Page 31 T. Josun - 31		Page 33 T. Josun - 33
1	T. Josun - 31 programmers and then you just	1	Page 33 T. Josun - 33 A. So again we'll go back to the
1	T. Josun - 31 T. Josun - 31 programmers and then you just 178. Q. Right.	1	T. Josun - 33 A. So again we'll go back to the customer service job. The biggest complaint, I
1 2 3	T. Josun - 31 programmers and then you just	1 2 3	Page 33 T. Josun - 33
1 2 3 4	T. Josun - 31 T. Josun - 31 programmers and then you just 178. Q. Right.	1 2 3 4	A. So again we'll go back to the customer service job. The biggest complaint, I would say about 80 percent of it, was the payments.
1 2 3	T. Josun - 31 programmers and then you just 178. Q. Right. A. It was there. There was the website. 179. Q. Sure.	1 2 3	Page 33 T. Josun - 33 A. So again we'll go back to the customer service job. The biggest complaint, I would say about 80 percent of it, was the payments. Nobody was getting paid out. 194. Q. Right.
1 2 3 4 5 6	T. Josun - 31 programmers and then you just 178. Q. Right. A. It was there. There was the website. 179. Q. Sure.	1 2 3 4 5	Page 33 T. Josun - 33 A. So again we'll go back to the customer service job. The biggest complaint, I would say about 80 percent of it, was the payments. Nobody was getting paid out. 194. Q. Right.
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1 2 3 4 5 6 7 8 9 10	Page 31 T. Josun - 31 programmers and then you just 178. 178. Q. Right. A. It was there. There was the website. 179. Q. Sure. A. There were people actually joining. 180. Q. Sure. A. There was this, there was that. 181. Q. I mean you know obviously there's an insolvency proceeding that's going on now?	1 2 3 4 5 6 7 8 9 10	 Page 33 T. Josun - 33 A. So again we'll go back to the customer service job. The biggest complaint, I would say about 80 percent of it, was the payments. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. So then again I'm sitting at the back of the seminar writing everything down, go to my hotel room. It's 3:00 o'clock in Portugal, it's 8:00 o'clock here. Wake up at 3:00 o'clock in the morning, I'm Skyping
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1 2 3 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 2 3 4 5 1 1 2 3 4 5 1 1 2 3 4 5 1 1 2 3 4 5 1 1 2 3 4 5 1 1 2 3 4 5 1 1 2 3 4 5 1 1 2 3 1 2 1 2 1 1 2 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 2 1 1 1 1 1 2 1 1 1 1 2 1 1 1 1 2 1 1 1 1 1 1 1 2 1 1 1 1 1 1 2 1	 Page 31 T. Josun - 31 programmers and then you just 178. Q. Right. A. It was there. There was the website. 179. Q. Sure. A. There were people actually joining. 180. Q. Sure. A. There was this, there was that. 181. Q. I mean you know obviously there's an insolvency proceeding that's going on now? A. I do now, yes. 182. Q. Right. Yes. A. That's why I'm here. 183. Q. And as well, we understand that Mr. Smith is the subject of a police investigation as well. Were you aware of that? A. I've notI was very rude when I left. We'll leave it at that. 184. Q. Okay. Well, we'll come to that in a minute but he hasn't been charged yet there is an ongoing police investigation that we're aware of A. M'hmm. 185. Qand the allegation is that it was 	$ \begin{array}{c} 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\\ \end{array} $	Page 33 T. Josun - 33 A. So again we'll go back to the customer service job. The biggest complaint, I would say about 80 percent of it, was the payments. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. So then again I'm sitting at the back of the seminar writing everything down, go to my hotel room. It's 3:00 o'clock in Portugal, it's 8:00 o'clock here. Wake up at 3:00 o'clock in the morning, I'm Skyping with the programmers here and I'm telling them, like, "Listen, this group of people in Portugal they said they're not getting paid. What's going on? Address it on the webinar. Do this, do this, do this." 195. Q. M'hmm. A. And that's where my 196. Q. Okay. Ajob 197. Q. Okay. Aended. Like that was it. 198. Q. Okay. A. That's all I did.
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	 Page 31 T. Josun - 31 programmers and then you just 178. Q. Right. A. It was there. There was the website. 179. Q. Sure. A. There were people actually joining. 180. Q. Sure. A. There was this, there was that. 181. Q. I mean you know obviously there's an insolvency proceeding that's going on now? A. I do now, yes. 182. Q. Right. Yes. A. That's why I'm here. 183. Q. And as well, we understand that Mr. Smith is the subject of a police investigation as well. Were you aware of that? A. I've notI was very rude when I left. We'll leave it at that. 184. Q. Okay. Well, we'll come to that in a minute but he hasn't been charged yet there is an ongoing police investigation that we're aware of A. M'hmm. 185. Qand the allegation is that it was too good to be true. 	$ \begin{array}{c} 1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\\24\end{array} $	Page 33 T. Josun - 33 A. So again we'll go back to the customer service job. The biggest complaint, I would say about 80 percent of it, was the payments. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. So then again I'm sitting at the back of the seminar writing everything down, go to my hotel room. It's 3:00 o'clock in Portugal, it's 8:00 o'clock here. Wake up at 3:00 o'clock in the morning, I'm Skyping with the programmers here and I'm telling them, like, "Listen, this group of people in Portugal they said they're not getting paid. What's going on? Address it on the webinar. Do this, do this, do this." 195. Q. M'hmm. A. And that's where my 196. Q. Okay. Ajob 197. Q. Okay. Aended. Like that was it. 198. Q. Okay. A. That's all I did. 199. Q. So I take it then that the answer to
$\begin{array}{c}1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\end{array}$	 Page 31 T. Josun - 31 programmers and then you just 178. Q. Right. A. It was there. There was the website. 179. Q. Sure. A. There were people actually joining. 180. Q. Sure. A. There was this, there was that. 181. Q. I mean you know obviously there's an insolvency proceeding that's going on now? A. I do now, yes. 182. Q. Right. Yes. A. That's why I'm here. 183. Q. And as well, we understand that Mr. Smith is the subject of a police investigation as well. Were you aware of that? A. I've notI was very rude when I left. We'll leave it at that. 184. Q. Okay. Well, we'll come to that in a minute but he hasn't been charged yet there is an ongoing police investigation that we're aware of A. M'hmm. 185. Qand the allegation is that it was 	$ \begin{array}{c} 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\\ \end{array} $	Page 33 T. Josun - 33 A. So again we'll go back to the customer service job. The biggest complaint, I would say about 80 percent of it, was the payments. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. 194. Q. Right. A. Nobody was getting paid out. So then again I'm sitting at the back of the seminar writing everything down, go to my hotel room. It's 3:00 o'clock in Portugal, it's 8:00 o'clock here. Wake up at 3:00 o'clock in the morning, I'm Skyping with the programmers here and I'm telling them, like, "Listen, this group of people in Portugal they said they're not getting paid. What's going on? Address it on the webinar. Do this, do this, do this." 195. Q. M'hmm. A. And that's where my 196. Q. Okay. Ajob 197. Q. Okay. Aended. Like that was it. 198. Q. Okay. A. That's all I did.

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r	Sheet 10 Page 34	ı 	Page 36
	T. Josun - 34		T. Josun - 36
1	in late July of 2012 you knew that there were		213. Q. Why you just quit.
2	problems or complaints but you didn't believe	2	A. Of course.
3	A. Like I	3	214. Q. Yes.
4	200. Qthe business to be		A. So what happened was I was on a family vacation with my mother, my step brother and
5	Adidn't have any	6	family vacation with my mother, my step-brother and my step-dad and my brother in Italy
6	201. Qa scam? Aunderstanding or grasp of what		215. Q. Okay.
8	Aunderstanding or grasp of what 202. Q. Okay.	8	Aso I was there for two weeks with
9	Athat ponzi	9	them and then from there I met everybody from
10	203. Q. Okay.	10	Banners Broker at Portugal. We were
11	Aor anything like that really	11	216. Q. For the convention, right?
12	truly was.	12	A. For the convention. Correct. I
13	204. Q. Now after you left, between end of	13	just made sense because I was already in Europe and
14	July 2012 and like now	14	then the timing with everything it was just hop,
15	A. M'hmm.	15	skip and jump away. So I did the family trip with
16	205. Qdid you ever come to a conclusion	16	my mother, went over there to the convention for
17	as to whether or not it was a ponzi scam or a	17	another two weeks. The first week, perfect. Went
18	scheme?	18 19	off no hitches. So there were two presentations I
19	A. I've read blogs. There were blogs	20	guess you could say, two big presentations and then the rest of the time was just dinners and meetings
20 21	that were written even during my employment 206. Q. Right.	21	and all that kind of stuff.
22	Abut that's when Raj would	22	217. Q. M'hmm.
23	justbasically you could say that was Raj's role	23	A. So the first presentation in the
24	in Canada at Banners Broker Canada, if anybody was	24	first week went perfect, went smooth.
25	badmouthing Banners Broker he would lock their	25	218. Q. M'hmm.
,	Page 35		Page 37
	T. Josun - 35		T. Josun - 37
1	account.		A. Sorry, excuse me. Oh, sorry.
2	207. Q. Okay. Raj	23	Excuse me. They were launching Banners Broker 2.0
3	A. Lock their account, lock their	4	or 2.5 219. Q. M'hmm.
45	account, lock their account. You had no access to withdrawing money. You had no access to this, you	5	Aor whatever it was.
	had no access unless youyou have 24 hours to take	6	220. Q. Right. Right.
6	down the blog	7	A. That was the whole thing. Raj and
8	208. Q. All right.	8	Chris came. Finally decided to show his face.
9			
	Athat's badmouthing Banners. But	9	
10		10	221. Q. Right. Chris Smith. A. Yes.
11	other than those blogs there was noduring my employment, no.	10 11	221. Q. Right. Chris Smith. A. Yes. 222. Q. Yes.
11 12	other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment,	10 11 12	 221. Q. Right. Chris Smith. A. Yes. 222. Q. Yes. A. So anyway, they brought their
11 12 13	other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment, obviously there's been a lot of blogs. Like have	10 11 12 13	 221. Q. Right. Chris Smith. A. Yes. 222. Q. Yes. A. So anyway, they brought their families. It was more of just like just a huge
11 12 13 14	other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment, obviously there's been a lot of blogs. Like have you seen what's on the internet about this company?	10 11 12 13 14	 221. Q. Right. Chris Smith. A. Yes. 222. Q. Yes. A. So anyway, they brought their families. It was more of just like just a huge family type of a thing.
11 12 13 14 15	other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment, obviously there's been a lot of blogs. Like have you seen what's on the internet about this company? A. Again, after I left it was very	10 11 12 13 14 15	 221. Q. Right. Chris Smith. A. Yes. 222. Q. Yes. A. So anyway, they brought their families. It was more of just like just a huge family type of a thing. 223. Q. Sure.
11 12 13 14 15 16	other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment, obviously there's been a lot of blogs. Like have you seen what's on the internet about this company? A. Again, after I left it was very nasty so I just separated myself completely.	10 11 12 13 14 15 16	 Q. Right. Chris Smith. A. Yes. 222. Q. Yes. A. So anyway, they brought their families. It was more of just like just a huge family type of a thing. 223. Q. Sure. A. The affiliates were all there,
11 12 13 14 15 16 17	other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment, obviously there's been a lot of blogs. Like have you seen what's on the internet about this company? A. Again, after I left it was very nasty so I just separated myself completely. 210. Q. Right.	10 11 12 13 14 15 16 17	 221. Q. Right. Chris Smith. A. Yes. 222. Q. Yes. A. So anyway, they brought their families. It was more of just like just a huge family type of a thing. 223. Q. Sure. A. The affiliates were all there, whoever could obviously afford to come and purchase
11 12 13 14 15 16 17 18	other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment, obviously there's been a lot of blogs. Like have you seen what's on the internet about this company? A. Again, after I left it was very nasty so I just separated myself completely. 210. Q. Right. A. The way it ended, which I would like	10 11 12 13 14 15 16 17 18	 221. Q. Right. Chris Smith. A. Yes. 222. Q. Yes. A. So anyway, they brought their families. It was more of just like just a huge family type of a thing. 223. Q. Sure. A. The affiliates were all there, whoever could obviously afford to come and purchase tickets and all that kind of stuff. There were some
11 12 13 14 15 16 17 18 19	other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment, obviously there's been a lot of blogs. Like have you seen what's on the internet about this company? A. Again, after I left it was very nasty so I just separated myself completely. 210. Q. Right. A. The way it ended, which I would like to explain to you guys as well	10 11 12 13 14 15 16 17 18 19	 221. Q. Right. Chris Smith. A. Yes. 222. Q. Yes. A. So anyway, they brought their families. It was more of just like just a huge family type of a thing. 223. Q. Sure. A. The affiliates were all there, whoever could obviously afford to come and purchase tickets and all that kind of stuff. There were some giveaways where they offered to pay for one lucky
11 12 13 14 15 16 17 18 19	other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment, obviously there's been a lot of blogs. Like have you seen what's on the internet about this company? A. Again, after I left it was very nasty so I just separated myself completely. 210. Q. Right. A. The way it ended, which I would like to explain to you guys as well 211. Q. Go ahead.	10 11 12 13 14 15 16 17 18 19 20 21	 221. Q. Right. Chris Smith. A. Yes. 222. Q. Yes. A. So anyway, they brought their families. It was more of just like just a huge family type of a thing. 223. Q. Sure. A. The affiliates were all there, whoever could obviously afford to come and purchase tickets and all that kind of stuff. There were some
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11 12 13 14 15 16 17 18 19 20 21	 other than those blogs there was noduring my employment, no. 209. Q. Right. And after your employment, obviously there's been a lot of blogs. Like have you seen what's on the internet about this company? A. Again, after I left it was very nasty so I just separated myself completely. 210. Q. Right. A. The way it ended, which I would like to explain to you guys as well 211. Q. Go ahead. A. It was just I was just over it. I was done with it. I moved on with my life and 	10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. Right. Chris Smith. A. Yes. Q. Yes. A. So anyway, they brought their families. It was more of just like just a huge family type of a thing. Q. Sure. A. The affiliates were all there, whoever could obviously afford to come and purchase tickets and all that kind of stuff. There were some giveaways where they offered to pay for one lucky affiliate and their guest for the two week stay Q. M'hmm. Aall their expenses at the hotel

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	Shoot 11 Page 38		435
	Sheet 11 Page 38 T. Josun - 38		T. Josun - 40
1		4	
1	A. So again the first week went		let me get through to him. I told them to move out
2	perfect. No problems, no hiccups. Everything went	2	of my way. They moved.
3	as smooth as possible. That was like my first time	3	238. Q. M'hmm.
4	ever organizing anything at that scale.	4	A. Went straight to Raj and I said,
5	226. Q. M'hmm.	4	"What the hell is going on? What is happening? Why
6		6	are they being escorted out?" Next thing I know my
	A. Second week was where the poop hit		ded in there being accorted out hy body quarde ac
7	the fan. I have no idea what happened. I left the		dad is there being escorted out by body guards as
8	hotel with one of the affiliates who's a very good,	8	well in front of everybody.
9	I guess you could say, family friend or something	9	239. Q. M'hmm.
10	like that. She was just	10	A. Publicly humiliated, kicked out of
11	227. Q. What's her name?	11	the hotel.
12	A. Manuela. I can't remember her last	12	240. Q. M'hmm.
13	name.	13	A. I think that was a day or two before
14	228. Q. Right.	14	the second presentation I guess you could say for
	220. Q. Trigitt.	15	the second group of people like the people who
15	A. I went and stayed with her at her		the second group of people, like the people who
16	apartment. I just needed to get away. There was a	16	couldn't make it for the first week because of
17	lot of rumors going around. There was a lot of this	17	timing, scheduling, they came to the second one.
18	happening, a lot of that happening. I stayed over	18	241. Q. Right.
19	one or two nights and then she brought me back to	19	A. It was about a day or two before
	the hotel.	20	then. So I just locked myself up in my room.
20 21 22	229. Q. M'hmm.	21	People were like whispering, talking, whatever. I
122	A. When I came back to the hotel	22	just didn't listen to anything or anybody. I had no
22		23	phono. I had no nothing
23	230. Q. M'hmm.		phone. I had no nothing.
24	AI saw Lorenzo publicly	24	242. Q. Right.
25	humiliating my two aunts who had come down for a	25	A. I was overseas. I didn't have any
	Page 39		Page 41
			Page 41 T. Josun - 41
	Page 39 T. Josun - 39		Page 41 T. Josun - 41
1	T. Josun - 39 Vacation. They were just there for a vacation.	1	Page 41T. Josun - 41T. Josun - 41
1	T. Josun - 39 Vacation. They were just there for a vacation. They were not part of the Banners Broker or anything	1 2	Page 41 T. Josun - 41 personal phone 243. Q. M'hmm.
1 2 3	T. Josun - 39 vacation. They were just there for a vacation. They were not part of the Banners Broker or anything like that. They were just there for vacation.	1	T. Josun - 41 personal phone 243. Q. M'hmm. Aor anything like that. Second
1 2 3 4	T. Josun - 39 vacation. They were just there for a vacation. They were not part of the Banners Broker or anything like that. They were just there for vacation. 231. Q. M'hmm.	1 2 3 4	T. Josun - 41 personal phone 243. Q. M'hmm. Aor anything like that. Second convention comes.
1 2 3 4 5	T. Josun - 39 vacation. They were just there for a vacation. They were not part of the Banners Broker or anything like that. They were just there for vacation. 231. Q. M'hmm. A. The entire time they went to Spain	1 2 3 4 5	T. Josun - 41 personal phone 243. Q. M'hmm. Aor anything like that. Second convention comes. 244. Q. Second week of the convention.
1 2 3 4 5 6	 T. Josun - 39 vacation. They were just there for a vacation. They were not part of the Banners Broker or anything like that. They were just there for vacation. 231. Q. M'hmm. A. The entire time they went to Spain on their own. Like they just crossed over to 	1 2 3 4 5 6	 Page 41 T. Josun - 41 personal phone 243. Q. M'hmm. Aor anything like that. Second convention comes. 244. Q. Second week of the convention. A. Sorry. The second presentation.
1 2 3 4 5 6 7	 Page 39 T. Josun - 39 vacation. They were just there for a vacation. They were not part of the Banners Broker or anything like that. They were just there for vacation. 231. Q. M'hmm. A. The entire time they went to Spain on their own. Like they just crossed over to Mallorca. Like they were just doing their own 	1 2 3 4 5 6 7	T. Josun - 41 personal phone 243. Q. M'hmm. Aor anything like that. Second convention comes. 244. Q. Second week of the convention. A. Sorry. The second presentation. Yes.
1 2 3 4 5 6 7 8	 Page 39 T. Josun - 39 vacation. They were just there for a vacation. They were not part of the Banners Broker or anything like that. They were just there for vacation. 231. Q. M'hmm. A. The entire time they went to Spain on their own. Like they just crossed over to Mallorca. Like they were just doing their own thing. He is in their face screaming at them, 	1 2 3 4 5 6 7 8	Page 41 T. Josun - 41 personal phone 243. Q. M'hmm. 243. Q. M'hmm. A. or anything like that. Second convention comes. 244. Q. Second week of the convention. 244. Q. Second week of the convention. Yes. 245. Q. Oh, I said
1 2 3 4 5 6 7 8 9	 Page 39 T. Josun - 39 vacation. They were just there for a vacation. They were not part of the Banners Broker or anything like that. They were just there for vacation. 231. Q. M'hmm. A. The entire time they went to Spain on their own. Like they just crossed over to Mallorca. Like they were just doing their own thing. He is in their face screaming at them, calling them names in the middle of the main lobby. 	1 2 3 4 5 6 7 8 9	 Page 41 T. Josun - 41 personal phone 243. Q. M'hmm. Aor anything like that. Second convention comes. 244. Q. Second week of the convention. A. Sorry. The second presentation. Yes. 245. Q. Oh, I said A. Sorry. Second presentation. I go
1 2 3 4 5 6 7 8 9	 Page 39 T. Josun - 39 vacation. They were just there for a vacation. They were not part of the Banners Broker or anything like that. They were just there for vacation. 231. Q. M'hmm. A. The entire time they went to Spain on their own. Like they just crossed over to Mallorca. Like they were just doing their own thing. He is in their face screaming at them, calling them names in the middle of the main lobby. 	1 2 3 4 5 6 7 8	Page 41 T. Josun - 41 personal phone 243. Q. M'hmm. 243. Q. M'hmm. A. or anything like that. Second convention comes. 244. Q. Second week of the convention. 244. Q. Second week of the convention. Yes. 245. Q. Oh, I said
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	Sheet 12 Page 42		. Page 44
4	T. Josun - 42	2	T. Josun - 44
2	Awhatever reason. I have 249. Q. M'hmm.		258. Q. Right. A. So that day he confirmed it
			259. Q. Right.
4		4	AChris. Sorry. Chris
5	family, Chris and his assistant Kyra and Stephanie	5	260. Q. Yes.
6	Schlacht. I don't	6	Aconfirmed. Made a public
7	250. Q. M'hmm.	7	announcement, all this, all that. And seminar
8	A. I think that's how you pronounce her	8	finishes, I go straight up to my room. I don't
9		9	associate
10	251. Q. M'hmm.	10	261. Q. M'hmm.
11	A. So all of a sudden I am called back	11	Amyself with any of them. I don't
13	to that corridor area. The hall is filling up with affiliates and what not and Raj and Chris are pacing	12	talk to any of them. 262. Q. M'hmm.
14	back and forth	14	A. Raj and Chris call me into Raj's
15	252. Q. M'hmm.	15	room. I go in and they basically just were giving
16	Aback and forth, back and forth,	116	me like, "Good job." Like, "Thank you
17	back and forth and I'm like, "What is going on? Why	17	263. Q. M'hmm.
18	are you freaking out? What is happening?"	18	Afor doing all of this. Like
19	253. Q. Right.	19	we're heading home tomorrow. When are you leaving?"
20	A. And they're talking about how the	20	264. Q. M'hmm.
21	cops are coming down like to arrest them. Interpol	21	A. "I'm not leaving until the day after
22 23	is coming. "Can you make sure our families make it	22	you guys" 265. Q. Right.
23	home safe?" And I'm just looking at them laughing in their faces. I'm like, "Your families can take	23	265. Q. Right. Aand all that kind of stuff and
24 25	care of themselves." I'm like, "Calm down. You	25	they basically said, "Well, if you want you're more
20	Page 43		Page 45
	T. Josun - 43		T. Josun - 45
1	guys are being drama queens." They said they'd got	1	than welcome to stay employed with us." You know,
2	death threats. They said that people are going to	23	like, "Whatever happened between us and your dad has
3	shoot them if they stand up on the stage. All this		nothing to do with you." Blah, blah, blah. And I'm
4	kind of nonsense.	4	like, "Whatever, I don't care. I still need a job
5	So, they begin the seminar, the	5	obviously when I go back home so whatever, I'll just
67	presentation and Chris goes up on stage and he publicly announces that "Kuldip Josun is not a	b	deal with it and I'll just stay working with you." 266. Q. Right.
8	manger, not a CEO. He was just a face of the	8	266. Q. Right. A. We leave, come home and that's when
9	company. We sent him out to meet with you people.	9	I trained my last group of people. I think there
10	I am the sole owner of Banners Broker. I am the	10	were four or five
11	CEO. I'm this, I'm that."	11	267. Q. Sure. Sure.
12	254. Q. All right.	12	Aemployees that they had hired and
110	A There is a base but a second and	13	it was the Thursday. I went into Raj's office and
13	A. Then everybody's gasping.		
14	Everybody's likebecause there are a lot of	14	we had a screaming match
14 15	Everybody's likebecause there are a lot of 255. Q. Sure.	14 15	we had a screaming match 268. Q. M'hmm.
14 15 16	Everybody's likebecause there are a lot of 255. Q. Sure. A. I guess, you know, this is person	14 15 16	we had a screaming match 268. Q. M'hmm. Aand I quit.
14 15 16 17	Everybody's likebecause there are a lot of 255. Q. Sure. A. I guess, you know, this is person you see. This is the man you see. This is the	14 15 16 17	we had a screaming match 268. Q. M'hmm. Aand I quit. 269. Q. Okay. So tell me about that. A
14 15 16 17 18	Everybody's likebecause there are a lot of 255. Q. Sure. A. I guess, you know, this is person you see. This is the man you see. This is the man	14 15 16 17 18	we had a screaming match 268. Q. M'hmm. Aand I quit. 269. Q. Okay. So tell me about that. A screaming match, right, because you're back now and
14 15 16 17 18 19	Everybody's likebecause there are a lot of 255. Q. Sure. A. I guess, you know, this is person you see. This is the man you see. This is the man 256. Q. Right.	14 15 16 17 18 19	we had a screaming match 268. Q. M'hmm. Aand I quit. 269. Q. Okay. So tell me about that. A screaming match, right, because you're back now and you've been there for a week and then something
14 15 16 17 18 19 20	Everybody's likebecause there are a lot of 255. Q. Sure. A. I guess, you know, this is person you see. This is the man you see. This is the man 256. Q. Right. Ayou talk to. That they just	14 15 16 17 18 19 20	we had a screaming match 268. Q. M'hmm. Aand I quit. 269. Q. Okay. So tell me about that. A screaming match, right, because you're back now and you've been there for a week and then something A. So before I even got home he was
14 15 16 17 18 19 20	Everybody's likebecause there are a lot of 255. Q. Sure. A. I guess, you know, this is person you see. This is the man you see. This is the man 256. Q. Right. Ayou talk to. That they just assumed Kul	14 15 16 17 18 19 20 21	we had a screaming match 268. Q. M'hmm. Aand I quit. 269. Q. Okay. So tell me about that. A screaming match, right, because you're back now and you've been there for a week and then something A. So before I even got home he was already home for a day
14 15 16 17 18 19 20 21 22 23	Everybody's likebecause there are a lot of 255. Q. Sure. A. I guess, you know, this is person you see. This is the man you see. This is the man 256. Q. Right. Ayou talk to. That they just assumed Kul	14 15 16 17 18 19 20 21 22 23	we had a screaming match 268. Q. M'hmm. Aand I quit. 269. Q. Okay. So tell me about that. A screaming match, right, because you're back now and you've been there for a week and then something A. So before I even got home he was already home for a day 270. Q. Right. Aso who knows what he had told
14 15 16 17 18 19 20 21 22	 Everybody's likebecause there are a lot of 255. Q. Sure. A. I guess, you know, this is person you see. This is the man you see. This is the man 256. Q. Right. Ayou talk to. That they just assumed Kul 257. Q. Kul. Right. 	14 15 16 17 18 19 20 21 22	we had a screaming match 268. Q. M'hmm. Aand I quit. 269. Q. Okay. So tell me about that. A screaming match, right, because you're back now and you've been there for a week and then something A. So before I even got home he was already home for a day 270. Q. Right.

Sheet 13 Page 46	- 437
T. Josun - 46were working there. When I came back it was thatsense of like I was not welcome.272. Q. M'hmm.A. I was being judged. I was beingcriticized, all that kind of stuff and so I wasbeing the bigger person. I was dealing with it,dealing with it273. Q. M'hmm.9Adealing with it and then come10that last day I was like, you know what, it's notworth it.12274. Q. Sure. So what were the words thatwere exchanged between you and him?14A. Do I really have to say them?15275. Q. That's okay. You can say exactlywhat was said, like verbatim. You don't need tohold anything back. I think it's better that way.18276. Q. M'hmm.21277. Q. Yes.	T. Josun - 481A. "You can "F" yourself", and that2was3285.Q. Right.4Ait.5286.Q. And how did he respond to that?6A. He would never talk back to me. He7never talked back to me.8287.Q. Okay.9A. He just sat there and took it.10288.Q. Now I just want to go back to11Portugal and when you came into the hotel lobby and12your two aunts were being sort of berated by this13Lorenzo guy.14A. Oh, what a pig. He's a pig.15289.Q. So tell me, who's Lorenzo?16A. Lorenzo was brought on, I believe,17by Raj. Again I believe that they had some history18and I'm not sure what his specific role was to be19quite honest. He would just kind of come and go.20Q. M'hmm.
 A. I found him very creep-like. Very creepy. The way he treated his one assistant Amber, oh my goodness, was ridiculous. Treated her like 	23Aaround.24291.Q.Right.25A.He was never a part of any of our
Page 47 T. Josun - 47 1 she was a dog. But apparently they've known each 2 other from before. She was employed with him before 3 or they worked together before, so she seemed to be 4 fine with the way he treated her. 5 278. Q. M'hmm. 6 A. So when I went to Raj's office, in 7 the beginning he was very sympathetic. It's like, 8 'Okay. Like I understand. I understand. I 9 understand." And then, I just kind of just had it 10 all pent up. Like I'd just seen my aunts being 11 escorted out. 12 279. Q. M'hmm. 13 A. Like seeing my father kicked out. 14 Like I guess it just all came back 15 280. Q. M'hmm. 16 Aand I just went off on him. So I 17 told him to go "F" himself 18 281. Q. And you quit? 21 A. I quit. 22 Q. And 23 Q. And 24 Q. Sure.	Page 49 T. Josun - 49 1 staff training. He was never really a part of any 2 meetings I had with Raj, like regarding the staff 3 and their training and the quizzing and the 4 questions, that kind of stuff. 5 292. Q. 6 A. But he was always around. He was 7 always there. 8 293. Q. 9 A. But I don't know what his 10 specific 11 294. Q. 12 about your aunts and 13 A. He called them terrorists and he 14 called them the "B" word. 15 295. Q. Right. 16 A. And he is in their face 17 296. Q. Right. 18 A. like screaming at them. 19 297. Q. Right. 20 A. The bodyguards even came up to me 21 and they were like, "Tara, we are so sorry. We're 21 and they were like, "Tara, we are so sorry. We're

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	Sheet 14 Page 50 T. Josun - 50		Page 52 T. Josun - 52
1 2	299. Q. M'hmm. Aand were so polite and were so	1 2	shady. Manuela was driving me back to the hotel and Stephanie's texting me. She's like, "Oh, Tara, we
3	nice. They took care of my aunts. They got them into the car. They were not rude.	3	heard from everybody that you've left, that you've gone home. Like don't worry about it. I'll take
5	300. Q. Right.	5	care of the second seminar. Like I've already been
67	A. The bodyguards were not rude. 301. Q. Yes.	6	working with Raj and Chris", and I'm like, "I'm outside the hotel."
8	A. Lorenzo was rude.	8	314. Q. Right.
9 10	302. Q. Yes. A. Got them in the car and took them to	9	A. "I have not left." 315. Q. Right.
11	a different hotel somewhere else.	111	A. "I am coming back."
12 13	303. Q. Okay. A. And thenyes.	12	316. Q. But did you ask your aunts or Kul why they'd been escorted out?
14 15	304. Q. And your father was escorted out as	14	A. My one aunt had a very traumatic
15 16	well? A. M'hmm.	15	response to the whole thing. She was actually hospitalized after that
17	305. Q. What happened there? Did he speak	17	317. Q. Right.
18 19	to you as he was leaving or like did you have an understanding as to why they were	18 19	Aso they were in the hospital and I didn't leave. Like I was
20	A. No.	20	318. Q. Sure.
21 22	306. Q. At the time you didn't but subsequent to that?	21	Astill employed. My employer is still here, you know. They are they ones that paid
23	A. Like after the fact?	22 23	for my
24 25	307. Q. Yes. Yes. A. Like I said, second I left that	24 25	319. Q. Right. Aplane ticket. They're the ones
	Page 51 T. Josun - 51		Page 53 T. Josun - 53
1	office I asked no further questions.	1	that are paying. Like the last thing I wanted
2 3	308. Q. Right. A. I was absolutely done.	23	wasI guess you could say I was looking out for number one.
4	309. Q. But I mean it must have been pretty	4	320. Q. Right.
5 6	traumatic because you stayed in the hotel I know for a couple more days	5	A. Last thing I wanted was them to tell me to go "F" myself.
7	A. M'hmm.	67	321. Q. Right.
8 9	 Qand you actually went to the second presentation. 	8 9	A. They'd be like, oh yes, by the way. Here you are. You're stuck with a two week hotel
10	A. M'hmm.	10	bill and here you are, you're stuck with a plane
11 12	311. Q. But you'd seen your aunts and your father being escorted out and publicly humiliated so	11	ticket home. 322. Q. What about Kul though, did you ask
13	I mean, what were you thinking? Like why were they	13	Kul why he'd been escorted out?
14 15	being escorted out? A. I didn't know who I could trust.	14 15	A. I didn't see my dad. 323. Q. Now are you close to your dad or
16	Like anybody that was there, everybody that was	16 17	what's theI'm just wondering why you didn't see
	there was gone for two days. I was gone for a	18	him particularly at this time? A. At that time?
17 18	day or two days. I have no idea what happened in I		324. Q. Yes. Yes.
17 18 19	day or two days. I have no idea what happened in that time.	19	
17 18 19 20 21	that time. 312. Q. Right. A. I had no idea who I could trust.	20 21	A. As he was walking out he's like, "Just stay." He's like, "Just be calm. Like I'm
17 18 19 20 21 22	that time. 312. Q. Right. A. I had no idea who I could trust. The other assistant, Stephanie, who is also a "B"	20 21	A. As he was walking out he's like, "Just stay." He's like, "Just be calm. Like I'm fine. Everything's good."
17 18 19 20 21	that time. 312. Q. Right. A. I had no idea who I could trust.	20	A. As he was walking out he's like, "Just stay." He's like, "Just be calm. Like I'm

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2 gone to at that 3 bodyguards of 4 time. Like it 5 326. Q. 6 A. 7 and emotions 8 327. Q. 9 A. 10 days. 11 328. Q. 12 spoke to him. 13 and now, righ 14 A. Io 15 all. 16 329. Q. 17 A. M 18 something? I 19 phone I'm like 20 330. Q. 21 A. 22 331. Q.	T. Josun - 54 t. I didn't know what hotel they had t point. Then by the time the ot back to me, it's already the seminar vas just Right. a whirl wind of chaos and mayhem and everything. It was just Right. a crazy, crazy, crazy, couple But I mean at some point I guess you Right? Like sometime between then t, you spoke to him? to not talk to him about BB at And why is that? hy would I want to relive Even when I was talking to Erin on the , "I can't believe this bullshit is	$ \begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 9 \\ 20 \\ 21 \\ 22 \\ 23 \\ 23 \\ 23 \\ 23 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24$	 Page 56 T. Josun - 56 Smith? A. The last contact I believe I had with Chris was the day they checked out of the hotel. 338. Q. Okay. A. Like I said, they left the 3:00 o'clock in the morning time. They called me because they were stuck with this ridiculously huge bill 339. Q. Right. Aand they called me down and there were like, "Tara, what are we paying for, what are we not paying for", and I was just like, "Whatever." Went to the concierge, I got the bill and I'm basically sitting there and I'm like, "We pay for this, we pay for this but we don't pay for that." 340. Q. M'hmm. A. "We're paying for this, we pay for this, we pay for this. These are the charges that you guys agreed to." 341. Q. Sure. A. As I had stated that they agreed to pay for a lucky affiliate and a guest all expenses included within the hotel but then I guess other
24 with Banners 25 A. It	Broker? elieve it was after I screamed at	24 25	people were saying, "Oh, yes. Just put it on. We're here with Banners Broker", so I guess a tab
3 what you wan 4 332. Q. 5 A. An 6 and he's like '' 7 333. Q. 8 A. 9 334. Q. 10 Broker with hi 11 A. No 12 335. Q. 13 him why it was 14 hotel? 15 A. No 16 answer would 17 would just tell 18 336. Q. 19 A. He 20 337. Q. 21 principals are you mentioned 23 Banners Broke one at a time,	d I'm like, "I feel good doing it" all right" Right. and that was it. Ind you haven't discussed Banners m ever since then?		 Page 57

	Sheet 16 Page 58	, P	age 60 440
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 18 19 20 21 22	T. Josun - 58 A. Pardon? 351. Q. How did it get so expensive? A. Oh, let's see. Because Raj and Chris had to fly first class, number one 352. Q. Okay. Awith family and kids. 353. Q. Right. A. Their wives. So both Chris and Raj's wives came. 354. Q. Right. A. Raj's mother came and then their children, all under the age of 12 355. Q. Yes. Aall flew first class. They both stayed in the presidential suites. 356. Q. M'hmm. A. They had cars. Like you name it, this hotel was decked out. Like it was 357. Q. Right. Aamazing. 358. Q. Yes.	1 2 3 4 5 6 7 8 9 10 11 23 14 15 16 17 18 19	T. Josun - 60 and asked himI was like, "What do I do with this phone? Do I bring it back? Do you want it?" He's like, "I'm not in the office tomorrow if you want to come by and drop it off." So I went back the next day and I dropped it off. So the last time I saw him was the day I quit. The last time I had any contact with him was the next day when I spoke to him over the phone about my company phone. 367. Q. Okay. Okay. And then your father Kul Josun, I take it you see him on a regular basis to this day or when was the last time that you saw Kul? A. The last time I saw him, probably about three or four weeks ago? 368. Q. Okay. A. We went out for dinner with my husband, my brother. 369. Q. So your father lives in Toronto? A. Brampton. 370. Q. Brampton. Okay. But he doesn't live with you?
22 23 24 25	A. They did the golfing there. They did the amenities. They used up everything they possibly could. Raj was very power hungry. I guess that's the best way.	23 24	A. No. 371. Q. No. A. I'm married. I live on my own. 372. Q. Right. Okay. And is your father
	 T. Josun - 59 T. Josun - 59 359. Q. Okay. A. He's a power hungry creep. 360. Q. Now when you and your father flew did you guys fly first class? A. Never. Actually, sorry. When I was booking the tickets 361. Q. Right. Athey were always coach. 362. Q. Right. A. Coach, If anything, at the mostmy dad's a tall guy, I'm a tall girl. 363. Q. Right. A. We would get the extra leg room 364. Q. Right. Right. Awhich is like \$200 extra per person. The one time we flew to England, Raj booked our trips for us and they were first class. I believe that was \$10,000 per ticket. 365. Q. So that answers the question when you last saw Smith. What about Dixit, Raj? When was the last time you had any contact with Raj? A. So I had quit, left. I still had the company phone though 	Pereception 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Hight: Oray: And is your lattice age 61 T. Josun - 61 still living with your aunt? A. A. He lives in her basement, yes. 373. Q. Okay. Okay. So you see your father on a regular basis but you just don't talk about Banners Broker? A. Never. 374. Q. Okay. All right. And your father has still not gone back to work for Banners Broker at all? A. No. 375. Q. No? A. From what I know. 376. Q. Okay. Okay. Is he working in a business similar to Banners Broker, like do you know what he's doing? A. I have no idea. To be quite honest, that was a huge learning process for me. After that I was like, okay, reality, Monday to Friday, 9:00 to 5:00 job. Anything above and beyond that, like I'm strictly tunnel vision. Like 377. Q. Right. A. that's how money is supposed to be earned. That's how you're supposed to work. Anything beyond that I just don't care Anything beyond that I just don't care

	.Sheet 17 Page 62		. Page 64
	T. Josun - 62	!	T. Josun - 64
1	Alike I don't	1	Acompany bill. Receipts from
2	379. Q. Right.	2	traveling or anything like that were brought back
3	Aask questions.	3	and given to Jeanette and Amber and Raj. Raj had
4	380. Q. So sitting here today you don't know	4	his own accountant who took all of our receipts.
5	what your dad is doing?	5	397. Q. Was that Mary, the accountant?
6	A. No.	6	A. I can't remember her name. I
7	381. Q. Now I want to talk a bit about your	1 7	398. Q. Was it a woman?
8	employment terms, Tara.	8	A. I believe it was a female but I'd
9	A. M'hmm.	9	never seen her, I've never talked to her. I would
10	382. Q. So when you were hired by Dixit in	110	just come in and drop off. "Here are the receipts
11	February of 2012, I know there was no employment	111	from this trip"
12	papers at that point but like how were you paid?	12	399. Q. Sure.
13	What was your colory?	13	
10	What was your salary?		
14	A. My starting salary?	14	400. Q. Okay.
15 16	383. Q. Yes.	15	A. But I never talked to her. That's
10	A. I believe it was like minimum wage	116	not true. I'm sorry. Like
17	starting, like \$30,000, \$35,000.	117	401. Q. Now it's a long time ago. I
18	384. Q. Thousand	18	appreciate that.
19 20 21 22 23	A. Yes.	19	A. There was a woman who came in and
20	385. Qa year?	20	she took books from Jeanette. Maybe
21	A. Annually, yes.	21	402. Q. Was there a Liberty Tax Service that
22	386. Q. Yes. Okay. And then did that ever	22	was involved or
23	change?	23	A. Yes. That does sound familiar.
24	A. When I became a staff trainer I	24 25	403. Q. Right.
25	believe it went up to \$60,000.	25	A. Either she was employed with them or
	Page 63		Page 65
	T. Josun - 63		T. Josun - 65
1	387. Q. Okay. \$60,000 a year?	1	she used to work for them and then she went on her
2	A. Correct.	2	own or this was a side job for her, I don't know but
3	388. Q. And did that change again?	3	that does sound familiar.
2 3 4 5	A. No.	4	404. Q. Okay. Okay. All right. So going
5	389. Q. Okay. And in addition to the base	5	back to my question.
6	salary were you paid any bonuses?	10	
7		0	A. I'm sorry.
8	A. Like monetary bonuses?	67	A. I'm sorry.
10	A. Like monetary bonuses?	7	A. I'm sorry. 405. Q. I'm just trying to get
9	A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a	78	A. I'm sorry. 405. Q. I'm just trying to get A. Yes.
9	A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No.	7 8 9	A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total
9	A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or	7 8 9 10	A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave
9 10 11	A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No.	7 8 9 10 11	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or
9 10 11 12	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? 	7 8 9 10 11 12	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like
9 10 11 12 13	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 	7 8 9 10 11 12 13	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never
9 10 11 12 13 14	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits 	7 8 9 10 11 12 13 14	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially
9 10 11 12 13 14 15	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits associated with what you did? Like were there any 	7 8 9 10 11 12 13 14 15	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially when I worked in Toronto there was nothing like
9 10 11 12 13 14 15 16	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits associated with what you did? Like were there any gifts or anything that's non monetary? 	7 8 9 10 11 12 13 14 15 16	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially when I worked in Toronto there was nothing like that.
9 10 11 12 13 14 15 16 17	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits associated with what you did? Like were there any gifts or anything that's non monetary? A. Like a company 	7 8 9 10 11 12 13 14 15 16 17	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially when I worked in Toronto there was nothing like that. 407. Q. Right.
9 10 11 12 13 14 15 16 17 18	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits associated with what you did? Like were there any gifts or anything that's non monetary? A. Like a company 394. Q. Like cell phones, cars, trips. You 	7 8 9 10 11 12 13 14 15 16 17 18	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially when I worked in Toronto there was nothing like that. 407. Q. Right. A. Nothing for like food or lunch or
9 10 11 12 13 14 15 16 17 18 19	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits associated with what you did? Like were there any gifts or anything that's non monetary? A. Like a company 394. Q. Like cell phones, cars, trips. You know, anything that you 	7 8 9 10 11 12 13 14 15 16 17 18 19	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially when I worked in Toronto there was nothing like that. 407. Q. Right. A. Nothing for like food or lunch or anything like that. Nothing like an allowance or
9 10 11 12 13 14 15 16 17 18 19 20	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits associated with what you did? Like were there any gifts or anything that's non monetary? A. Like a company 394. Q. Like cell phones, cars, trips. You know, anything that you A. I know you can't spell it out for 	7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially when I worked in Toronto there was nothing like that. 407. Q. Right. A. Nothing for like food or lunch or anything like that. Nothing like an allowance or anything like that. But the trips were covered and
9 10 11 12 13 14 15 16 17 18 19 20 21	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits associated with what you did? Like were there any gifts or anything that's non monetary? A. Like a company 394. Q. Like cell phones, cars, trips. You know, anything that you A. I know you can't spell it out for me 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially when I worked in Toronto there was nothing like that. 407. Q. Right. A. Nothing for like food or lunch or anything like that. Nothing like an allowance or anything like that. But the trips were covered and then I had a company phone which I also used for
9 10 11 12 13 14 15 16 17 18 19 20 21	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits associated with what you did? Like were there any gifts or anything that's non monetary? A. Like a company 394. Q. Like cell phones, cars, trips. You know, anything that you A. I know you can't spell it out for me 395. Q. Thank you. Yes. Yes. 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially when I worked in Toronto there was nothing like that. 407. Q. Right. 407. Q. Right. A. Nothing for like food or lunch or anything like that. Nothing like an allowance or anything like that. But the trips were covered and then I had a company phone which I also used for personal as well.
9 10 11 12 13 14 15 16 17 18 19 20 21	 A. Like monetary bonuses? 390. Q. Yes. Like a Christmas bonus or a A. No. 391. Q. Nothing like that or A. No. 392. Qno type of bonus whatsoever? A. No. 393. Q. Were there any like job benefits associated with what you did? Like were there any gifts or anything that's non monetary? A. Like a company 394. Q. Like cell phones, cars, trips. You know, anything that you A. I know you can't spell it out for me 395. Q. Thank you. Yes. Yes. A. Okay. So obviously the trips were 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. I'm sorry. 405. Q. I'm just trying to get A. Yes. 406. Qan idea of your total compensation in terms of like gifts. If they gave you car. If they paid like your rent or A. Oh, no. No. No. So nothing like paying my rent or anything like that. They never paid my gas, like my commute to and from, especially when I worked in Toronto there was nothing like that. 407. Q. Right. A. Nothing for like food or lunch or anything like that. Nothing like an allowance or anything like that. But the trips were covered and then I had a company phone which I also used for personal as well. 408. Q. Sure.
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Sheet 18 Page 66	Page 68
T. Josun - 661Aand I just did everything off the2one phone. And then I had the laptop but that just3strictly stayed at the office but that was my4laptop.5410.Q. Right.6A. It's a brand new laptop.7411.Q. Sure. Right.8A. And then I did get an Audi.9412.Q. Okay.10A. I don't know how to pronounce it.11It was a 2014.12413.Q. What kind of Audi was it?13A. 2014 IS4.14414.Q. IS4. Okay.15A. It was a beauty.16415.Q. What colour?17A. It was a dark grey colour. Very18dark grey.19416.Q. Okay. Anything else that you can20think of along those lines?21A. That was it.22417.Q. Okay. So I can see where you'd need23the cell phone and the computer but what about the24car? What was the deal there?	Tara or you're going to need this for work?" Likewhat was his thinking behind?A.He loved dropping money.4424.Q.He loved what?5A.4He loved dropping the money.6425.Q.Right.7A.426.Q.9anyone else that you're aware of?10A.14A.15427.16428.17A.18428.19Q.11427.12A.13428.14A.15429.16for you?17A.18Kul's daughter.19430.19A.10A.11a lot of stuff.12I was a staff trainer.13Q.14Sure.15431.16Q.17Sure.18Kul's from what19431.20Q.21a lot of stuff.23431.24You can see?25I mean I take it he had things like
25 A. That was a complete shock. That was T. Josun - 67 1 a surprise. I was completely blind sided by that. 2 Raj signed off on the money order. He had a 3 corporate account with Audi. He signed off on the 4 money order and he was like, "Here you go". And I'm 5 like, "Are you kidding me?" "Like this is crazy, 6 this is insane." 7 418. Q. 8 A. "What is going on?" And then when 9 my father got his T4, the cost of that vehicle was 10 added on as 11 419. Q. 14 To my father's T4? 15 A. That was purchased at a dealership 16 in Whitby so that when I worked in the Oshawa office 17 A20. Q. 18 421. Q. 19 A. I can't give you a specific time 10 or Q. 18 421. Q. 19 A. I can't give you a specific time 10 or Q.	25 that? He was able to have the advantages of some of

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	Sheet 19 Page 70 T. Josun - 70		Page 72 T. Josun - 72
1	439. Q. But he had a car though presumably,	1	of the programmers. I don't know if there were four
23	right? A. He did, yes.	2	or five guys in the car. 453. Q. M'hmm.
4	440. Q. Okay. And was it from Raj as well,	4	A. They were driving on the 401 coming
5	do you know?	5	to Oshawa and Raj is like, "Don't freak out.
67	A. I can't 441. Q. Okay.	6	Everybody's okay." I'm crying on the phone hysterically, like "Tell me
8	A. I don't know.	8	454. Q. Right.
9	442. Q. All right. I think you said it was	9	Ahow it happened", and all I know is that it was an accident with an 18 wheeler.
10 11	a 2014. Right? A. M'hmm.	10 11	455. Q. And everyone was okay?
12	443. Q. I don't think it could be a 2014	12	A. Everyone was okay.
13	vehicle.	13 14	456. Q. And the car was totaled? A. The car was written off. It was
14 15	A. Oh, sorry. 2012. 444. Q. 2012.	15	like mangled.
16	A. Oh my goodness.	16	457. Q. Right. Right. And that was your
17	445. Q. Okay. And so what happened to the	17 18	dad's car? A. He drove it. I don't know
18 19	car? A. To the car?	19	458. Q. Right. Okay.
20	446. Q. Yes. The one that	20	Aif it was
21	A. The one in my name? 447. Q. Yes, the one they gave you.	21 22	459. Q. Okay. Ahis but
22 23	A. It was under my name so I'm 21 years	23	460. Q. Right.
24	old. I have no use for an Audi. It sucked during	24	Ahe
25	that winter.	25	461. Q. Right. And the car that you traded
	T. Josun - 71		T. Josun - 73
1	448. Q. Right.	1	in that Raj Dixit gave to you, you traded it in for
23	A. It was the worst vehicle to have ever. And then I just got engaged in the January,	23	an SUV. And do you still have that SUV? A. Yes.
4	obviously my husband now and we always talking about		462. Q. And what kind of SUV is that?
5	having kids and stuff like that and I was like,	5	A. It's a 2014 Chevy Equinox.
67	"What am I doing driving a stupid car around, it's ridiculous?"	67	Q. Equinox. So 2014? A. M'hmm.
8	449. Q. M'hmm.	8	463. Q. Okay. And what colour is that?
9	A. So I traded it in and I got an SUV.	9	A. It's black. 464. Q. All right. Can you pass me the
10 11	450. Q. Okay. Now I've heard somewhere along the lines and I could be mistaken, but that	111	Competition Bureau statement? So just to make
12	the car was in an accident or something, that it was	12	things easier for the next part of this cause I
13	in a crash? Was that the case? A. Not mine.	13 14	think it's going to save us some time, I just need those pages 34 to 37. Thanks.
14 15	451. Q. No? Was there another Audi that was	15	So what this is and you may not have seen
16	in a crash somewhere relating to this Banners	16	it but if you look at paragraph 50 you'll see your
17 18	Broker? A. That would've been my dad's.	17 18	name above it. A. M'hmm.
19	452. Q. Okay. And what happened there	19	465. Q. And this is an extract from an
20	because I heard something about that and it was on	20	affidavit that was filed by the Police
21	my list of things to ask? A. I was not in town. I was in Niagara	21 22	A. M'hmm. 466. Qsometime after you were
22 23	Falls for a weekend trip with my fiancee. Got a	23	interviewed by the Competition Bureau.
24	call from Raj saying that they were in an accident.	24	A. Okay.
25	It was my dad, Chris, Chris' cousin and one or two	25	467. Q. And so if you look at paragraph 50

			Page 76	444
	Sheet 20 Page 74 T. Josun - 74		Page 76	T. Josun - 76
1	it says:	1	481. Q. Florida?	11000011 70
	"On April 11th, Tara Josun, daughter of	2		nse because they were
23	Kuldip Josun attended at the Competition	3	looking to do something wit	h Florida. They were
4	Bureau, 151 Yonge Street, Suite 1402 to	4	looking to payments or som	nething
5	provide a voluntary statement. Ms. Josun's	5	482. Q. Okay.	Ŭ
6	statement was video and audio recorded	6	Alike that or	
6 7	under oath. Leading the interview with Ms.	7	483. Q. All right. So w	ho could make
8 9	Josun was Competition Law Officer, Isabelle	8	payments to affiliates apart	
9	Sauve	9	A. Again, I wouldn'	t be able to confirm
10	A. M'hmm.	10	actually 100 percent. I know	w Peter was getting
11	468. Qaccompanied by myself, Kathleen	11	trained on it.	
12	McCoy."	12	484. Q. Right.	, stale law stale with
13	A. Yes. There were two women in the	13	A. He was working	side-by-side with
14 15	room with me.	14	Chris but again, that was w 485. Q. Right.	nen i was just leaving
115	469. Q. Okay. And so you remember that?	16		in to the Ochawa
16 17	A. I remember going there 470. Q. Yes.	17	Athis office to g office. Peter had just come	o to the Oshawa
18	470. Q. Yes. Aand I remember their questions	18	486. Q. I see. So par	agraph 55 said that
19	were more technical based.	19	"Ms. Josun states that Chris	s Smith is the only
20	471. Q. Right. Okay. Well they made a	20	person who could make pay	ments to affiliates. She
21	statement actually and I thought we could just walk	21	would get lists from Smith."	So did vou ever get
22	through it	22	lists from Smith?	
23	A. Sure.	23	A. So what that wa	s was when I was
24	472. Qand kind of refresh your memory	24	overseas and people were of	complaining about not
25	and it will answer some questions that we have. So	25	getting paid and what not, I	was taking down their
	Page 75		Page 77	
	T. Josun - 75			T. Josun - 77
1	just take a minute and read through it and then I'll		ID number	
2	ask some questions to you. Okay. So yes, take a	2	487. Q. Right. Aand their first i	name and last
3	minute. Some of this we've already covered, Tara.	3	name. I had my list, he had	
5	A. M'hmm. 473. Q. I think the first new part and maybe	5	compile. And basically, the	only nurnose for me
6	473. Q. I think the first new part and maybe we can approach it that way is paragraph 55		having a copy of that list wa	s to make sure he
7	A. M'hmm.	6	didn't miss anybody that wa	s having problems with
8	474. Qand just take a minute and read		payments.	
9	paragraph 55 and then I have a question for you.	8 9 10	488. Q. Isee. Okay.	
10	A. Okay.	10	A. More of a cross r	eference making
10 11	475. Q. So apart from Chris Smith, was there	11	sure the information that I w	as sending to him, he
12	anyone else who could make payments to affiliates?	12	was receiving and he was o	n the same page as me and
13	A. He brought his cousin on board,	13	basically we would just go the	
14	Peter.	14	that yes, these were a list of	the people that were
15	476. Q. Peter Williams?	15	complaining, take care of it.	aive him liste right?
16	A. As I was just about to say, I can't	16 17	489. Q. So you would	give him lists, right?
17	remember the last name	18	He wouldn't give you lists?	
18	477. Q. Okay. Abut the first name was Peter.	19	A. Again, when I wa would send him by e-mail	is working uverseas I
19	478. Q. And was he from	20	490. Q. Right.	
21	A. The States.	21	Athe affiliate cod	de, however it
22	479. Q. Okay.	22	went, the name of the affiliat	
20 21 22 23	A. I can't remember again where but	23	information he needed as to	
24 25	480. Q. Okay.	24	the package or the ID of the	
25	Ahe was from the States.	25	491. Q. M'hmm.	

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			Demo 90
	Sheet 21 Page 78 T. Josun - 78		Page 80 T. Josun - 80
1	Awasn't earning, I guess you would	1	would pass it off to the guy who would take care of
2	say the revenue. I would make that list. When I	2	that stuff.
3	would arrive back here he would have it printed and	$ \overline{3} $	503. Q. Okay. Then in the next paragraph it
4	I was just cross referencing what I had sent to him	4	says, "Affiliates could only withdraw 50 percent of
5	and then what I had on my written list.	5	their earnings no matter how long they were in the
6	492. Q. Okay. Okay. But did that have	6	program. Was that your understanding?
7	something to do with payouts then, just so I	7	A. Yes, from the get-go that's what I
8	understand?	8	was trained.
9	A. It had something to do with payouts.	9	504. Q. Okay. Okay. So to me that means
10	493. Q. With making payments to affiliates?	10	that they had to leave 50 percent of their earnings
11	A. If that's what you're talking about.	11	in the company?
12	494. Q. Okay.	12	A. I believe so. So it didn't go
13	Athen yes, that would be the	13	dormant. Like it didn't justthere was still
14	payout.	14	something in there to keep it. Their package.
15	495. Q. Okay.	15	Sorry. Their own account, I guess you could say, to
16	A. But I didn't actually have anything	16	keep it going so it just didn't go dormant.
17	to do with the money aspect.	17	505. Q. Then on the next, paragraph 57,
18	496. Q. Okay.	18	actually at the top of the next page it talks about
19	A. I was taking the complaints from	19	training sessions every Tuesday evening in the
20	people who weren't receiving the money and making	20	Oshawa office?
21	sure he had their information	21	A. What that was theI only attended
22	497. Q. Sure. Okay.	22 23	one. Chris couldn't make it. Chris was the one, I
21 22 23 24	Ato pay them.	23	believe, who normally did them or Raj. It was in
24	498. Q. And then the paragraph goes on to	24	the evening and what it was wasagain, I don't know where these people came from. They were either
	say that you said:	25	Know where mese people dame nom. They were enner
	Page 79 T locup - 70	_	Page 81 T. losun - 81
1	T. Josun - 79	1	T. Josun - 81
1	T. Josun - 79 Affiliates had to have accounts with	1	T. Josun - 81 local or they had flown in.
1	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive	1 2 3	T. Josun - 81 local or they had flown in. 506. Q. M'hmm.
1 2 3	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza	1 2 3 4	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys
1 2 3 4	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then	3	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts
1 2 3 4 5	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard	3 4 5	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see.
1 2 3 4 5	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the	3	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and
1 2 3 4 5 6 7	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference"	3 4 5	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems.
1 2 3 4 5 6 7 8	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference" A. M'hmm.	3 4 5 6 7	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems.
1 2 3 4 5 6 7	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference" A. M'hmm. 499. Q. So just help us to understand the	3 4 5 6 7 8 9 10	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems. 508. Q. Okay.
1 2 3 4 5 6 7 8 9 10 11	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference" A. M'hmm. 499. Q. So just help us to understand the relationship with these companies, SolidTrust Pay and Payza and Mastercard. What did you know about	3 4 5 6 7 8 9 10 11	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems. 508. Q. Okay. A. So they basically would just call them in and then address their issues face-to-face at those evening ones.
1 2 3 4 5 6 7 8 9 10 11 12	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference" A. M'hmm. 499. Q. So just help us to understand the relationship with these companies, SolidTrust Pay and Payza and Mastercard. What did you know about the payment processors?	3 4 5 6 7 8 9 10 11 12	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems. 508. Q. Okay. A. So they basically would just call them in and then address their issues face-to-face at those evening ones. 509. Q. Right. You only went to one of
1 2 3 4 5 6 7 8 9 10 11 12 13	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference" A. M'hmm. 499. Q. So just help us to understand the relationship with these companies, SolidTrust Pay and Payza and Mastercard. What did you know about the payment processors? A. I only knew what they told me. I	3 4 5 6 7 8 9 10 11 12 13	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems. 508. Q. Okay. A. So they basically would just call them in and then address their issues face-to-face at those evening ones. 509. Q. Right. You only went to one of them?
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference" A. M'hmm. 499. Q. So just help us to understand the relationship with these companies, SolidTrust Pay and Payza and Mastercard. What did you know about the payment processors? A. I only knew what they told me. I was the staff trainer. I only had to know enough to train the staff. These were our partners. These	3 4 5 6 7 8 9 10 11 12 13 14 15	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems. 508. Q. Okay. A. So they basically would just call them in and then address their issues face-to-face at those evening ones. 509. Q. Right. You only went to one of them? A. I presented one. 510. Q. Oh.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference" A. M'hmm. 499. Q. So just help us to understand the relationship with these companies, SolidTrust Pay and Payza and Mastercard. What did you know about the payment processors? A. I only knew what they told me. I was the staff trainer. I only had to know enough to train the staff. These were our partners. These were the payments.	3 4 5 6 7 8 9 10 11 12 13 14 15 16	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems. 508. Q. Okay. A. So they basically would just call them in and then address their issues face-to-face at those evening ones. 509. Q. Right. You only went to one of them? A. I presented one. 510. Q. Oh. A. Like I did like a training.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference" A. M'hmm. 499. Q. So just help us to understand the relationship with these companies, SolidTrust Pay and Payza and Mastercard. What did you know about the payment processors? A. I only knew what they told me. I was the staff trainer. I only had to know enough to train the staff. These were our partners. These were the payments. 500. Q. Right.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems. 508. Q. Okay. A. So they basically would just call them in and then address their issues face-to-face at those evening ones. 509. Q. Right. You only went to one of them? A. I presented one. 510. Q. Oh. A. Like I did like a training. Basically what I would do training, like I did the
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 17 10 10 11 11 11 11 11 11 11 11 11 11 11	 T. Josun - 79 "Affiliates had to have accounts with SolidTrust Pay to make and receive payments. Banners Broker had tried Payza but it was not working out. And then Banners parted with pre-paid Mastercard around July of 2012 at the time of the Portugal conference" A. M'hmm. 499. Q. So just help us to understand the relationship with these companies, SolidTrust Pay and Payza and Mastercard. What did you know about the payment processors? A. I only knew what they told me. I was the staff trainer. I only had to know enough to train the staff. These were our partners. These were the payments. 500. Q. Right. A. Like instead of PayPal it was Payza. 501. Q. Right. A. Worked similarly. 502. Q. Right. A. Worked similarly. 502. Q. Right. A. We would get complaints about Payza 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 T. Josun - 81 local or they had flown in. 506. Q. M'hmm. A. These were people that were the guys who had owned the bigger accounts 507. Q. I see. Athat had put in more money and that they were the ones having the problems. 508. Q. Okay. A. So they basically would just call them in and then address their issues face-to-face at those evening ones. 509. Q. Right. You only went to one of them? A. Like I did like a training. Basically what I would do training, like I did the training session for one. 511. Q. At night? A. At night. And so it goes on and it saysI think it's quoting you but in the same

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	Sheet 22 Page 82		Page 84
	T. Josun - 82		T. Josun - 84
1	revenue if you are not recruiting." So tell me	1	525. Q. Can you give me some examples
2	about that? What was your understanding in that	2	because I mean there'sand I'll tell you why.
3	respect?	$ \bar{3} $	There's a suggestion that he did this with Banners
	A. Again, that's what I was trained	4	Broker money.
5	from the get-go. That's what I was taught. That's	5	A. M'hmm.
6	what I was shown. Then what they had in this head	6	526. Q. Okay? Was that your understanding
			as well that he was paying for this lifestyle with
7	office	8	Banners Broker money?
8	513. Q. Right.	9	
9	Ain the Toronto office was the	10	A. Not my understanding.
10	programmer showing me the proof that the money		527. Q. First of all, what did you see him
11	wasn't being recycled	11	doing? How did he spend his money to your
12	514. Q. Sure.	12	knowledge? How did you see him?
13	Ait was coming from a third party,	13	A. Like the trainers. Like the staff
14	but nobody knew who that third party was.	14	that he would hire, we would go out to Milestones
15	515. Q. Right. Okay. And then in paragraph	15	for lunch and he would just like pay for 12 people
16	59, "Ms. Josun named many key individuals."	16	to go out for
17	A. M'hmm.	17	528. Q. Right.
18	516. Q. It says, "She described her father	18	Alunch. And I remember Jeanette,
19	as having been the face."	19	I don't know her last, I cannot remember her last
20	A. M'hmm.	20	name, I remember her always going up and asking him,
21	517. Q. Just on that point, does Kul know	21	"Where are the accounting books? Like how I do log
22	that you're coming here to meet with us today?	22	this? How do you want to me do this? How do you
23	A. Does he? I haven't talkedI don't	23	want me to take care of that?" I would say yes, it
24	talk to him.	24	always had to be expensive lunches. It always just
25	518. Q. So you haven't told him that you're	25	had to be
		-	
	Page 83		Page 85
			Page 85 T. Josun - 85
1	T. Josun - 83	1	Page 85 529. Q. M'hmm.
1 2	Page 83 T. Josun - 83 coming here? A. No.	1 2	T. Josun - 85 529. Q. M'hmm. Athat kind of stuff.
1 2 3	T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager	1	T. Josun - 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about
1 2 3 4	T. Josun - 83 Coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that	1 2 3 4	Page 85 T. Josun - 85 529. Q. M'hmm. A. that kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see
1 2 3	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the 	1 2 3 4 5	 Page 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see there?
1 2 3 4 5 6	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the hotel in Portugal? 	1 2 3 4	T. Josun - 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see there? A. I'm not sure about that stuff. I do
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1 2 3 4 5 6 7 8 9 10 11	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the hotel in Portugal? A. M'hmm. He was just always around and he was always hovering over Raj but I don't, like 520. Q. Okay. Did you have a lot of contact with Raj Dixit 	1 2 3 4 5 6 7 8 9 10 11	 Page 85
1 2 3 4 5 6 7 8 9 10 11 12	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the hotel in Portugal? A. M'hmm. He was just always around and he was always hovering over Raj but I don't, like 520. Q. Okay. Did you have a lot of contact 	1 2 3 4 5 6 7 8 9 10 11 12	 Page 85 T. Josun - 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see there? A. I'm not sure about that stuff. I do know that he was looking at an Audi SUV. I'm not sure again if he went through with the purchase. That's when I had left. 531. Q. M'hmm. A. In regards to jewellery, his wife never came by. Like
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1 2 3 4 5 6 7 8 9 10 11 12 13	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the hotel in Portugal? A. M'hmm. He was just always around and he was always hovering over Raj but I don't, like 520. Q. Okay. Did you have a lot of contact with Raj Dixit A. A lot of contact? 521. Qwhen you were at Banners? You'd 	1 2 3 4 5 6 7 8 9 10 11 12 13 14	 Page 85 T. Josun - 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see there? A. I'm not sure about that stuff. I do know that he was looking at an Audi SUV. I'm not sure again if he went through with the purchase. That's when I had left. 531. Q. M'hmm. A. In regards to jewellery, his wife never came by. Like
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the hotel in Portugal? A. M'hmm. He was just always around and he was always hovering over Raj but I don't, like 520. Q. Okay. Did you have a lot of contact with Raj Dixit A. A lot of contact? 521. Qwhen you were at Banners? You'd see him every day presumably or? A. I would say the majority of like every day throughout the week. Yes. 522. Q. Right. A. If he was there. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 Page 85 T. Josun - 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see there? A. I'm not sure about that stuff. I do know that he was looking at an Audi SUV. I'm not sure again if he went through with the purchase. That's when I had left. 531. Q. M'hmm. A. In regards to jewellery, his wife never came by. Like 532. Q. Right. AI don't know if it bought it for her or anything like that. Like that stuff 533. Q. Sure. AI don't know. It was just
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the hotel in Portugal? A. M'hmm. He was just always around and he was always hovering over Raj but I don't, like 520. Q. Okay. Did you have a lot of contact with Raj Dixit A. A lot of contact? 521. Qwhen you were at Banners? You'd see him every day presumably or? A. I would say the majority of like every day throughout the week. Yes. 522. Q. Right. A. If he was there. 523. Q. And I'm interested in how heyou talked about him throwing money around, right, or 	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Page 85 T. Josun - 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see there? A. I'm not sure about that stuff. I do know that he was looking at an Audi SUV. I'm not sure again if he went through with the purchase. That's when I had left. 531. Q. M'hmm. A. In regards to jewellery, his wife never came by. Like 532. Q. Right. AI don't know if it bought it for her or anything like that. Like that stuff 533. Q. Sure. AI don't know. It was just 534. Q. Sure. Athe stuff within the office itself was just the lunches and that kind of stuff. 535. Q. Okay. Okay. And then
1 2 3 4 5 6 7 8 9 10 11 20 21	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the hotel in Portugal? A. M'hmm. He was just always around and he was always hovering over Raj but I don't, like 520. Q. Okay. Did you have a lot of contact with Raj Dixit A. A lot of contact? 521. Qwhen you were at Banners? You'd see him every day presumably or? A. I would say the majority of like every day throughout the week. Yes. 522. Q. Right. A. If he was there. 523. Q. And I'm interested in how heyou 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Page 85 T. Josun - 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see there? A. I'm not sure about that stuff. I do know that he was looking at an Audi SUV. I'm not sure again if he went through with the purchase. That's when I had left. 531. Q. M'hmm. A. In regards to jewellery, his wife never came by. Like 532. Q. Right. AI don't know if it bought it for her or anything like that. Like that stuff 533. Q. Sure. AI don't know. It was just 534. Q. Sure. Athe stuff within the office itself was just the lunches and that kind of stuff. 535. Q. Okay. Okay. And then
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the hotel in Portugal? A. M'hmm. He was just always around and he was always hovering over Raj but I don't, like 520. Q. Okay. Did you have a lot of contact with Raj Dixit A. A lot of contact? 521. Qwhen you were at Banners? You'd see him every day presumably or? A. I would say the majority of like every day throughout the week. Yes. 522. Q. Right. A. If he was there. 523. Q. And I'm interested in how heyou talked about him throwing money around, right, or splashing money around. Is that fair to say? A. M'hmm. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 5 16 17 18 19 20 21 22 23 24	 Page 85 T. Josun - 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see there? A. I'm not sure about that stuff. I do know that he was looking at an Audi SUV. I'm not sure again if he went through with the purchase. That's when I had left. 531. Q. M'hmm. A. In regards to jewellery, his wife never came by. Like 532. Q. Right. AI don't know if it bought it for her or anything like that. Like that stuff 533. Q. Sure. AI don't know. It was just 534. Q. Sure. Athe stuff within the office itself was just the lunches and that kind of stuff. 535. Q. Okay. Okay. And then A. And any time he flew it always had to be first class. 536. Q. Okay. But you knew that because
1 2 3 4 5 6 7 8 9 10 11 20 21	 Page 83 T. Josun - 83 coming here? A. No. 519. Q. You describe Dixit as the manager and Lorenzo Guarini as the right-hand man. Is that the same Lorenzo that you saw in the lobby at the hotel in Portugal? A. M'hmm. He was just always around and he was always hovering over Raj but I don't, like 520. Q. Okay. Did you have a lot of contact with Raj Dixit A. A lot of contact? 521. Qwhen you were at Banners? You'd see him every day presumably or? A. I would say the majority of like every day throughout the week. Yes. 522. Q. Right. A. If he was there. 523. Q. And I'm interested in how heyou talked about him throwing money around, right, or splashing money around. Is that fair to say? A. M'hmm. 524. Q. Dixit. Can you give 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Page 85 T. Josun - 85 529. Q. M'hmm. Athat kind of stuff. 530. Q. Anything else? Like what about jewellery, cars, trips, houses? What did you see there? A. I'm not sure about that stuff. I do know that he was looking at an Audi SUV. I'm not sure again if he went through with the purchase. That's when I had left. 531. Q. M'hmm. A. In regards to jewellery, his wife never came by. Like 532. Q. Right. AI don't know if it bought it for her or anything like that. Like that stuff 533. Q. Sure. AI don't know. It was just 534. Q. Sure. Athe stuff within the office itself was just the lunches and that kind of stuff. 535. Q. Okay. Okay. And then A. And any time he flew it always had to be first class.

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	Sheet 23 Page 86		. Page 88
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 13 14 5 6 7 8 9 21 22 3 24 25	 A. How did I know what? 537. Q. That he was flying first class. A. Oh, Amber. She worked in the same office that I did and she was the one that booked his flights. 538. Q. Okay. Got it. A. I know for sure he flew his entire family first class from Toronto to Portugal. 539. Q. M'hmm. A. That I know for sure because she messed up Chris' wife's last name 540. Q. Right. Aon the passport and there was a whole issue with that and she had called me freaking out saying that Raj yelled at her and all that kind of stuff. 541. Q. Right. 541. Q. Right. 542. Q. Right. 543. Q. Right. Okay. And do you know Amber's last name? A. I want to say it's Renison. 543. Q. Okay. And then Raj is married to 	1 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 12 14 5 16 7 8 9 10 11 12 12 14 15 16 17 10 10 11 12 10 10 11 12 10 10 10 10 10 10 10 10 10 10 10 10 10	T. Josun - 88 basically like, "Just you know, show her. She's going to start booking some trips for us. She's going to start doing this and that and whatever else." I said, "That'll be fine." So her and I probably worked together maybe two or three weeks at this office here 549. Q. Right. Aand then I went to Oshawa. 550. Q. Okay. Okay. A. And then I hardly saw her but she was a part of my last group of people that I was training so I knew she was only there because when I left 551. Q. M'hmm. Ashe was going to take over. 552. Q. Right. A. That's the only reason and I knew that. Gut feeling, woman's intuition, call it whatever you want, I knew the second I saw her face in my training room 553. Q. Right. Ait was because she was just there to learn as much as she possibly could so she could just pick up where I was leaving off. 554. Q. Okay.
	Page 87		Page 89
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 14 15 16 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 15 16 7 8 9 20 11 2 2 3 4 5 6 7 8 9 10 11 2 2 3 4 5 6 7 8 9 10 11 2 15 10 10 11 2 15 10 10 10 10 10 10 10 10 10 10 10 10 10	T. Josun - 87 Stephanie Schlacht. Did you ever meet Raj's wife or hear of her? A. I've met her once before and then at the convention. Again, are they married? 544. Q. Are they? Yes. A. Shut up. Gold digging "B" word. That's all I'm going to say. Oh, my goodness. The wife I met was Jen and she had his two kids, a boy and a girl. They were young, like they were babies. 545. Q. Right. Right. A. Oh, my God. I can't believe that. 546. Q. What did Stephanie do at Banners Broker? A. Oh, she was a snake. She wanted my job. She wanted me out of the picture as soon as possible. That was her main duty. She was basically hired because she was pretty. 547. Q. Right. Right. A. She worked at the restaurant here downtown, Joey's by the Eaton Centre there, attached to the Eaton Centre. 548. Q. Okay. A. She was the waitress/hostess whatever there. Again, I'd come into the office and there's this tall, thin, blonde girl and they're	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 3 24 25	T. Josun - 89 A. I can't get over that. Wow. Wow. Wow. Wow. 555. Q. Okay. A. What a pig. Oh, my god. What a pig. 556. Q. Okay. We'll take a break in a second. There's this one other person I want to ask you about. Paragraph 59, it's Lorenzo's brother, Frank Guarini. Did you ever meet him? Oh, there it is. We've got Amber's name right there. Amber Renison, do you see that in paragraph A. It is. Okay. 557. Q. Yes. Okay. And then Frank Guarini, G-U-A-R-I-N-I. A. I'm seeing the name here but I am honestly drawing such a blank. 558. Q. Okay. So you don't recall meeting the gentleman? A. Right here in front of you right now at this time it's a blank. 559. Q. Okay. Okay. Let's go off the record for a minute. A BRIEF RECESS

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Page 921TARA JOSUN, resumed2CONTINUED EXAMINATION BY MR. WARD:3560.3560.4about and I just want to go back quickly to rewind566A.7561.7561.8when your aunts were being escorted out and then you9attended for the second presentation but you9attended for the second presentation but you	TV, didn't
2 CONTINUED EXAMINATION BY MR. WARD: 2 locked myself in my room, cried, watched 3 560. Q. Just during the break I was thinking 3 4 about and I just want to go back quickly to rewind 3 570. Q. 5 to the Portugal conference. 5 A. Went to bed, woke up, went to 6 A. M'hmm. 5 561. Q. Right. When there was this incident 8 when your aunts were being escorted out and then you 8 571. Q. But I mean weren't you conce	TV, didn't
 3 560. Q. Just during the break I was thinking about and I just want to go back quickly to rewind to the Portugal conference. 6 A. M'hmm. 7 561. Q. Right. When there was this incident when your aunts were being escorted out and then you 3 eat. 4 570. Q. Right. 5 A. Went to bed, woke up, went to conference. 7 561. Q. Right. When there was this incident when your aunts were being escorted out and then you 8 about what had happened to them? Like you 	
 about and I just want to go back quickly to rewind to the Portugal conference. A. M'hmm. 561. Q. Right. When there was this incident when your aunts were being escorted out and then you 4 570. Q. Right. 5 A. Went to bed, woke up, went to 6 conference. 7 561. Q. Right. When there was this incident 8 when your aunts were being escorted out and then you 8 about what had happened to them? Like you 	the
5to the Portugal conference.5A. Went to bed, woke up, went to6A. M'hmm.6conference.7561.Q. Right. When there was this incident78when your aunts were being escorted out and then you8about what had happened to them? Like you	the
6 A. M'hmm. 6 conference. 7 561. Q. Right. When there was this incident 7 571. Q. But I mean weren't you concerning about what had happened to them? Like you 8 when your aunts were being escorted out and then you 8 about what had happened to them? Like you	the
6 A. M'hmm. 6 conference. 7 561. Q. Right. When there was this incident 7 571. Q. But I mean weren't you concerning as when your aunts were being escorted out and then you 8 when your aunts were being escorted out and then you 8 about what had happened to them? Like you	
8 when your aunts were being escorted out and then you 8 about what had happened to them? Like y	
9 attended for the second presentation but you 9 know where they were being taken.	/ou didn't
10 basically hold up in your room and then you left a 10 A. Obviously, I was concerned. T	he
11 couple of days later?	
12 A. It was like at the most, maybe 30, [12 worry, we're taking care of them. We're go	ping to
13 36 hours later. 13 take them to another hotel." I was like, "O	h, my _j
14 562. Q. Right. 14 God." All I saw was Raj and it was just I s	aw red
15 A. Like just over a day. [15] and I went straight for him. They had left.	They
16 563. Q. Okay. Okay. 16 had gone. After I had just talked to Raj he	was
17 A. I left first thing in the morning. 17 rumbling his mouth. People were standing	all around
18 564. Q. And did you say that during that 18 us just staring at me, watching me. I reme	mber
19 period you did not have like any communication or a [19 running back to my room crying and I just	
20 cell phone or something? Did I hear you say that 20 572. Q. But I mean you went to the signal 21 you didn't have a cell phone that worked? 21 presentation. Right?	econd
21 you didn't have a cell phone that worked? 21 presentation. Right?	
22A.I had my personal cell phone but I22A.Yes, I did.23didn't use it.Like I just didn'tI can't afford23573.Q.And did you ask Raj or anybo	
23 didn't use it. Like I just didn'tI can't afford 23 573. Q. And did you ask Raj or anybo	idy at
24 for those extra charges.	
25 565. Q. Okay. Because I guess what I'm 25 A. I didn't even talk to them. I	
T. Josun - 91	T. Josun - 93
	1. JUSUII - 93
	told you
	tolu you,
3out3we were in the corridor there4A. M'hmm.4574.Q. M'hmm.	
5 566. Qby these bodyguards that you 5 Aand Raj comes up to me say	<i>ina</i>
6 didn't contact them. And I know your aunt you 6 that they're getting death threats, that they	
7 mentioned was admitted to hospital in Portugal 7 getting threats that Interpol's coming to an	
8 A. In Portugal. 8 them, that the cops were coming to arrest 9 567. Qbecause of that incident? 9 these types of things. And he's like beggin	na me to
10 A. She had fainted. That's what I was 10 make sure I get his family back to Canada	
11 told by my one aunt when we had arrived back.	
12 568. Q. Right.	
13 A. She was hospitalized here and that's [13 575. Q. Didn't you use that opportun	itv to
14when I visited her.14say, what happened to my aunts and my f15569.Q.But in the 36 hours, I mean you must15A.I didn't want to talk to him any	
16 have reached out to Kul or your aunts to find out 16 than what I had to. I didn't talk to anybody	
	bluc
17 what was going on.	
17 what was going on. 17 didn't trust anybody. I didn't know who I c	
17what was going on.17didn't trust anybody. I didn't know who I ci18A. I was so upset. I was so emotional,18talk to or who I could trust.	you have
17what was going on.17didn't trust anybody. I didn't know who I co18A. I was so upset. I was so emotional,18talk to or who I could trust.19angry. It was chaotic. I was still responsible for19576.Q. Could you e-mail them? Dic	
17what was going on.17didn't trust anybody. I didn't know who I c18A. I was so upset. I was so emotional,18talk to or who I could trust.19angry. It was chaotic. I was still responsible for19576.Q.20an entire conference. I solely prepared, and I'm20a way of e-mailing? Like could you get on	your
17what was going on.17didn't trust anybody. I didn't know who I complete18A. I was so upset. I was so emotional,18talk to or who I could trust.19angry. It was chaotic. I was still responsible for19576.Q.20an entire conference. I solely prepared, and I'm20a way of e-mailing? Like could you get on21the worst like slipping from my mind, I was the only21laptop and e-mail your aunts or e-mail you	your
17what was going on.17didn't trust anybody. I didn't know who I complete18A. I was so upset. I was so emotional,18talk to or who I could trust.19angry. It was chaotic. I was still responsible for19576.Q.20an entire conference. I solely prepared, and I'm20a way of e-mailing? Like could you get on21the worst like slipping from my mind, I was the only21laptop and e-mail your aunts or e-mail you	your
17what was going on.17didn't trust anybody. I didn't know who I c18A. I was so upset. I was so emotional,18talk to or who I could trust.19angry. It was chaotic. I was still responsible for19576.Q. Could you e-mail them? Did20an entire conference. I solely prepared, and I'm20a way of e-mailing? Like could you get on21the worst like slipping from my mind, I was the only21laptop and e-mail your aunts or e-mail you22person that was taking care of setting up this22or	your

	Sheet 25 Page 94		Ч Т Раде 96
	T. Josun - 94		T. Josun - 9
1	578. Q. And you couldn't call them either?	1	Like who the hell am I
2	A. Again, I had no idea which hotel	2	585. Q. M'hmm.
3	they were staying at. I had no international phone	3	Ato go and take your money away
4	numbers. Like I didn't know anything and I thought	4	from you? And when I had mentioned that to him he
5	maybe that would be the best way was just to not be	5	was like, "Oh, okay." So, like I don't know how to
6	in contact with them, not to know what was	6	formerly write a contract or anything like that so
7	happening. I just didn't and I was away for two	7	it was just that kind of stuff. And then he
8	days and then I come back and then this shit just	8	586. Q. Okay.
9	happened and they were being gone and then this and	9	Awent on about, "We'll get it
10	that. I didn't even have a chance to like have a	10	legal", and all that kind of stuff.
11	breath, take a breath	11	587. Q. Were there many documents that were
12	579. Q. M'hmm.	12	on that stick? Like what else was on that USB stick
13	Acomprehend what was going on	13	that you recall?
14	around me. I just knew I had a responsibility.	14	A. This is almost what, two years now?
15	Okay, whatever. Get through this second conference.	16	588. Q. Yes. They were all documents that
16 17	People paid, took time out to come here. Their	17	you created or were they actually documents that you pulled off of a Banners Broker computer and put on
18	money. I'm not going to sit there and throw a temper tantrum, be a little child. Get the shit	18	the memory stick and took with you?
19	done and get out of here.	19	A. No. I've never took anything from
20	580. Q. So just back to this Competition	20	them. It was
21	Bureau statement. Paragraph 61 it says:	21	589. Q. Okay.
22	"Ms. Josun brought a USB stick with her	22	Alike, I don't know. I can't
23	containing numerous files she had created	23	remember. It's not recorded here. Do you not have
24	or had access to while employed with	24	copies of those? Like this is two years now. Like
25	Banners. At the end of the interview she	25	I don't know. I don't remember.
	Page 95		Page 97
	T. Josun - 95		T. Josun - 97
1	copied the file to a computer"	1	590. Q. Okay. And sitting here, do you have
2 3	Do you remember that?	2	any other documents to do with Banners Broker?
	A. Yes.	3	A. On me now?
4 5	581. Q. And so do you have a copy of those	4	591. Q. Or not on you now?
	documents you can A. I don't have that. I told Erin,		A. No. 592. Q. Do you have
6 7	A. I don't have that. I told Erin, like I don't have that USB. I couldn't honestly for	6	592. Q. Do you have A. Hell no. Like I said, it ended very
8	the life of me, I've moved.	8	abruptly. It was just a very hostile environment
9	582. Q. M'hmm.	9	when I had left and the only thing I walked out with
10	A. I've packed, I've unpacked, I've	10	was my purse.
11	packed, I've unpacked and I don't have any access.	11	593. Q. Okay. And the USB stick, right?
12	Like I don't have it on me.	12	A. Hmmm?
13	583. Q. Okay.	13	594. Q. And the USB stick I guess?
14	A. But I do remember doing that. What	14	A. Well, yes because
15	is was was documents that I myself created. Like I	15	595. Q. Right. Sure. And then
16	had said earlier, it was like Raj using me to kind	16	A. Those were my documents.
17	of pick my brain a little bit because I did have a	17	596. Q. Isee.
18	tiny little bit of legal background with contracts	18	A. That was my
	and that kind of stuff. It was just with him	19	597. Q. Okay.
19	locking people out of the accounts. I basically	20 21	Astuff. It wasn't copy written, it wasn't anything like that but I didn't want to
20	to la him "I ile you contrate that the their	1/1	it wash lanvining like that but I glont want to
20 21	told him, "Like you can't do that. It's their	20	con anything of mine acconiated with them any
20 21	told him, "Like you can't do that. It's their money. Like you can't just"	22	see anything of mine associated with them any
19 20 21 22 23 24	told him, "Like you can't do that. It's their money. Like you can't just" 584. Q. M'hmm.	22 23	see anything of mine associated with them any further.
20	told him, "Like you can't do that. It's their money. Like you can't just"	22	see anything of mine associated with them any

	Sheet 26 Page 98		• 450
1 2 3 4 5 6 7 8 9 10 11 12 3 4 15 16 17 18 19	 Sheet 26 Page 98 T. Josun - 98 599. Q. Okay. Right. Off the record for a sec. DISCUSSION OFF THE RECORD THE DEPONENT: Regardless of the fact that if what Raj had added to whatever I had created and whatever he had gotten, I don't know, more, like, legalized, I guess you could say, more of something with more of an impact, that would be his work beyond what I had. Nothing that I did was like formal. It was BY MR. WARD: 600. Q. Right. But in any event, you've told us that you don't have that USB stick anymore? A. I couldn't tell you. Like I couldn't tell you where it is. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 T. Josun - 100 Competition Bureau as well it looks like. It says, "Ms. Josun provided copies of her Record of Employment with Banners Broker Inc. and her Canada Revenue Agency T4. So I take it you gave copies of those to the Competition Bureau, Tara? A. If that's what it says there then 610. Q. Okay. Ayes, I did. 611. Q. And do you have copies of those for us as well or A. Honestly I told Erin, like I don't have anything. 612. Q. Okay. And what happened to your copies of those documents? A. Probably threw them out, shredded them. Like I don't know. I've moved so many times I don't know. 613. Q. Okay. A. I don't have my T4s from even the
20 21 22 23 24 25	 601. Q. Okay. And then the last paragraph from the Competition Bureau statement is paragraph 62. And so there's a reference to your T4 statement A. M'hmm. 602. Qin the employer's name of Stellar 	20 21 22 23 24 25	company I'm working at now from last year. Like I don't keep that stuff. 614. Q. I'm just going to go through my notes before we finish off Tara, but talk to me a bit more about the Portugal convention because I know you've told us that you were responsible for
1 2 3 4 5	T. Josun - 99 Point. A. Yes. I never had anything to do with that company ever. That company was opened and created after me. I had nothing to do with them. I don't know why my T4 was set up that way.	45	T. Josun - 101 organizing that. A. M'hmm. 615. Q. Were you like solely responsible for organizing that or A. With instruction
6 7 8 9 10 11 12 13	 603. Q. Okay. A. I believe my father said his T4 as well was from Stellar Point. 604. Q. All right. And you've told us that you were working for Banners Broker International, correct? A. I was initially yes 605. Q. Yes. 	6 7 9 10 11 12 13	 616. Q. Right. Aobviously. It's not like I had full on free range 617. Q. Sure. Ato plan an entire party and whatever. I obviously was given instruction. I was given this and given that but I was responsible to
14 15 16 17 18 19 20	 Aemployed by 606. Q. Okay. Athat and then it went to another umbrella. 607. Q. And did you get any other T4s apart from the one that's referred to A. I was only there for half the year. 608. Q. That's right. 	14 15 16 17 18 19 20 21	 618. Q. And who instructed you in relation to that? A. Raj. 619. Q. Raj Dixit? A. M'hmm. 620. Q. And did you work with anyone in organizing that? A. So I did have like assistants, I
21 22 23 24 25	 A. That was the last absolute thing I probably had to do with them was pay my taxes and that was it. 609. Q. And you gave that statement to the 	22 23 24 25	guess you'd say. It was Kyra, Kyra Gray, G-R-A-Y and Stephanie. 621. Q. Stephanie Schlacht? A. M'hmm. Oh, I still can'tevery

	Sheet 27 Page 102		Page 104
	T. Josun - 102		T. Josun - 104
1	time you say her name, that's what I think.	1	Banners Broker may have dealt with while you were
2	622. Q. All right. And	2	working with them, we talked about the payment
3	A. They were the ones that helped me	3	processors a little bit earlier.
1	set the chairs up, helped	4	A. Yes. So the only ones again that I
5	623. Q. Right.	5	knew of wereso when these payment companies were
6	Ame put tables in the foyer for a	6	introduced, this is where I was not myself working
	receiving line, like		behind a computer. I was just strictly hovering and
8	624. Q. Yes.	8	looking over and watching. So I didn't even really
9	Athe tickets, the decorating part	9	know how those payments were working in the sense
10	of it and they were the ones thatwe handed out	10	that where the affiliate provides the payment and
11	quizzes in the middle of the seminar and they would	11	then it goes through. I didn't deal with that
12	answer and they were the ones like in the back	12	635. Q. M'hmm.
13	rushing to mark them and everything and the winner	13	Akind of stuff. But it was the
14	got like a prize	14	SolidTrust Pay and the Payza. The Payza came before
15	625. Q. Okay.	15	the Mastercard and from what I can remember, the
16	Aand all that	16	Payza didn't really last that long.
17	626. Q. Okay.	117	636. Q. Okay. Do you know why?
18	Akind of stuff.	18	A. Again, I'm told what I'm told. I'm
19	627. Q. But in terms of the actual set up of	19	an employee. Do you tell your employees how you run
20	the conference in terms of locating the hotel,	20	your company? Do you tell them like what
21	paying the deposit, arranging	21	637. Q. And you didn't ask, right, because
22	A. Payments was not me at all. I had	22	you had the script was it that
23	no access to any credit cards. I had no access to	23	A. Yes. I had my answers right there
24	money, period. That was not me	24	in front of me and if I ever had any questions I had
25	628. Q. So who	25	the guy who created the program a phone call away.
	Page 103		Page 105
	T. Josun - 103		T. Josun - 105
1	Abut	1	638. Q. When you were at Banners did you
2	629. Q. Sorry.	2	ever deal with any law firms at all?
3	Abeing in touch with the hotel	3	A. Did I deal with any law firms?
4	manager, the person that	4	639. Q. Yes. Or did you meet any lawyers
5	630. Q. Right.	5	that were involved in Banners Broker?
6	Aconducts their events and stuff	6	A. I went to one meeting at a law firm
7	like that, event coordinator, I was e-mailing back	7	strictly just to be there and take notes but
8	and forth and back and forth and if he had any	8	640. Q. Okay. And tell me about that
9	questions I couldn't answer they were	9	meeting, what you recall about it.
10	631. Q. Okay. But did you find	10	A. It was a law firm downtown Toronto.
11	Asent to Raj.	11	I can't remember exactly what it was for. I think
12	632. Qthe hotel and book the rooms and	12	it was they were trying to get licences in Canada
13	let them know how many people were coming and	13	and they wanted to know how they could go about
14	A. I let them know how many employees	14	doing that to open their business in provinces.
15	of ours were going and it was like how many people	15	641. Q. Okay.
16	from Banners Broker company was coming. Raj and	16	A. I can't. Like there were two guys
17	Chris told me what rooms they wanted. I made sure	17	we met with. It was a big law firm. I don't even
18	that there were those rooms available.	18	remember the names. I don't
19	633. Q. For instance, who decided that it	19	642. Q. Was it Harry Fogul?
100		100	A. I can't confirm. Like I
20	was going to be in Portugal and who found the hotel?	20	
21	was going to be in Portugal and who found the hotel? A. I don't know why they picked	21	643. Q. Or
21 22	was going to be in Portugal and who found the hotel? A. I don't know why they picked Portugal. To be honest I couldn't tell you. For	21 22	643. Q. Or A. I cannot confirm that.
21 22 23	was going to be in Portugal and who found the hotel? A. I don't know why they picked Portugal. To be honest I couldn't tell you. For the hotel, I don't know. I can't remember if I was	21 22 23	643. Q. Or A. I cannot confirm that. 644. Q. Or Don Johnston? Does that sound
21 22	was going to be in Portugal and who found the hotel? A. I don't know why they picked Portugal. To be honest I couldn't tell you. For	21 22	643. Q. Or A. I cannot confirm that.

	_ Sheet 28 Page 106		Page 108
	T. Josun - 106		T. Josun - 108
1	I then obviously before the Portugal convention so now	1	Broker related company in Belize?
2		2	A. In Belize? No. Not that I had
3		3	anything like to do with that or anything. I had no
4		4	knowledge.
5		5	660. Q. Okay. And you didn't hear anyone
6		6	talking about operations in Belize or Isle of Man
7	A. Me	7	A. No.
8		8	661. Qat any time?
9		9	A. No.
10		10	662. Q. Have you ever of Parrot Marketing?
11	647. Q. Right.	11	A. No idea who that is.
12		12	663. Q. Have you ever heard of G Cube Media?
13		13	A. Yes. That's what Peter was working
14		14	on or with. I've heard of it but I don't know what
15		15	it is or what it does.
16		16	664. Q. Okay. And you heard of it, just to
17	A. Sorry. I'm just trying to	17	be clear, when you were working at Banners between
18		18	February and July of 2012?
19		19	A. Correct. That would be my like last
20	650. Q. Yes. There was a time when you went	20	week or so when Peter was introduced when he was
21	over and you visited a law firm. Right?	21	brought in.
22	A. M'hmm.	22	665. Q. Sure.
23		23	A. I just remember hearing from walking
24		24 25	in and out.
25	<u> </u>	25	666. Q. So just tell me about that meeting
	Page 107 T. Josun - 107] []	Page 109T logun 100
1		1	T. Josun - 109 with Peter Williams.
	A. Like attended a meeting with them 652. Q. Attended or	2	
	Aor	$\frac{2}{3}$	A. I've never had a meeting 667. Q. No.
4	653. Q. Attended a meeting, or had a phone	4	Awith him.
5	call, or anything to do with this?	5	668. Q. Or the introduction.
6	A. No.	6	A. Oh, I didn't find out that he was
7	654. Q. No? Now one of the things that the		actually related to Chris until later on but
8	Receiver is interested in learning about is Banners	8	initially he wasn't introduced as his cousin.
9	Broker's operations outside of Canada. Okay? And	9	669. Q. Okay.
10	you've told us about some of the trips that you took	10	A. He was just introduced as Peter and
11	with your father.	11	he's going to helping us out with United States and
12	A. Yes.	12	that was it.
13	655. Q. Okay. Do you know anything or have	13	670. Q. And that was it. What about a
110			
	vou ever heard of an entity called. Banners Broker	14	company called. World eWallet? Does that sound
14	you ever heard of an entity called, Banners Broker	14 15	company called, World eWallet? Does that sound familiar?
14 15	you ever heard of an entity called, Banners Broker International Limited Isle of Man?	15	
14 15 16	you ever heard of an entity called, Banners Broker International Limited Isle of Man? A. No.		familiar? A. The eWallet does sound familiar but
14 15 16 17	you ever heard of an entity called, Banners Broker International Limited Isle of Man? A. No. 656. Q. Okay. Have you heard of the Isle of	15 16 17	familiar? A. The eWallet does sound familiar but again I couldn't tell you how it worked or
14 15 16 17 18	you ever heard of an entity called, Banners Broker International Limited Isle of Man? A. No.	15 16	familiar? A. The eWallet does sound familiar but again I couldn't tell you how it worked or howlike just
14 15 16 17 18 19	you ever heard of an entity called, Banners Broker International Limited Isle of Man? A. No. 656. Q. Okay. Have you heard of the Isle of Man? A. Have I heard of the Isle of Man?	15 16 17 18 19	familiar? A. The eWallet does sound familiar but again I couldn't tell you how it worked or howlike just 671. Q. Right.
14 15 16 17 18 19 20 21	you ever heard of an entity called, Banners Broker International Limited Isle of Man? A. No. 656. Q. Okay. Have you heard of the Isle of Man?	15 16 17 18	familiar? A. The eWallet does sound familiar but again I couldn't tell you how it worked or howlike just 671. Q. Right. Amemory.
14 15 16 17 18 19 20 21 22	you ever heard of an entity called, Banners Broker International Limited Isle of Man? A. No. 656. Q. Okay. Have you heard of the Isle of Man? A. Have I heard of the Isle of Man? 657. Q. Do you know where that is or? A. I have no idea where it is.	15 16 17 18 19 20	familiar? A. The eWallet does sound familiar but again I couldn't tell you how it worked or howlike just 671. Q. Right. Amemory. 672. Q. And you didn't have any dealings
14 15 16 17 18 19 20 21 22 23	you ever heard of an entity called, Banners Broker International Limited Isle of Man? A. No. 656. Q. Okay. Have you heard of the Isle of Man? A. Have I heard of the Isle of Man? 657. Q. Do you know where that is or? A. I have no idea where it is. 658. Q. Okay. Did you know that there was a	15 16 17 18 19 20 21 22 23	familiar? A. The eWallet does sound familiar but again I couldn't tell you how it worked or howlike just 671. Q. Right. Amemory. 672. Q. And you didn't have any dealings with World eWallet, did you?
14 15 16 17 18 19 20 21	you ever heard of an entity called, Banners Broker International Limited Isle of Man? A. No. 656. Q. Okay. Have you heard of the Isle of Man? A. Have I heard of the Isle of Man? 657. Q. Do you know where that is or? A. I have no idea where it is.	15 16 17 18 19 20 21 22	familiar? A. The eWallet does sound familiar but again I couldn't tell you how it worked or howlike just 671. Q. Right. Amemory. 672. Q. And you didn't have any dealings with World eWallet, did you?

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			453
	Sheet 29 Page 110 T. Josun - 11(Page 112 T. Josun - 112
1	I could be able to answer that better but	1	A. He was UK.
2	674. Q. What about Michael Kraemer, is that	2	687. Q. Driscoll? Ian Driscoll could it
3	name familiar to you?	3	have been?
4	A. Off the top of my head, no. That		A. That sounds familiar but again I
5	doesn't sound familiar.	5	wouldn't be able to confirm 100 percent but it was
6	675. Q. Now in terms of affiliates that you met when you were traveling around the world or when	6	lan. 688. Q. Okay. And so Claudia, Paul, Ian.
8	you were working in Canada	8	Who were some of the other people you met when you
9	A. M'hmm.	9	had your two Europe trips?
10	676. Qwere there some affiliates that	10	A. Okay. So we went to Belgium and
11	were more important and bigger investors in Banners	11	there was Gino. Again, I can't confirm his last
12	than others?	12	name.
13	A. So I was only part of the large	13	689. Q. Right.
14	group seminars. Like other than that I wouldn't be	14	A. And then we went to Cypress and our
15 16 17	able to pin point. "Oh, yes	15	host there who was an affiliate wascan't remember his first name but I know his last name.
17	677. Q. Right. Athat's the guy who pays us this	17	690. Q. Okay.
18	much."	18	A. Douther, D-O-U-T-H-E-R. I want to
19	678. Q. Are there any that you remember?	19	say his first name is Frank but I can't confirm
20 21	Are there any names of affiliates from around the	20	thát
21	world that	21	691. Q. Right.
22	A. The main people I remember would	22	A100 percent.
23	679. Q. The main people.	23	692. Q. Okay. What other countries or names
22 23 24 25	Abe the ones that were the hosts.	24	can you think of? A. Those were the main
20	The ones that actually reached out and said, "We	125	A. I hose were the main
	D 111		Page 112
\square	Page 111T. Josun - 111		Page 113 T. Josun - 113
1	T. Josun - 111	1	Page 113 693. Q. Right. T. Josun - 113
1	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we	1 2	T. Josun - 113 693. Q. Right. Athat are coming to me that we've
1 2 3	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure.	1 2 3	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already.
1 2 3 4	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was	1 2 3 4	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay.
1 2 3 4 5	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were	1 2 3 4 5	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from
1 2 3 4 5 6	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions	1 2 3 4 5 6	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from those trips
1 2 3 4 5 6 7	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So	1 2 3 4 5 6 7	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from those trips 695. Q. Okay.
1 2 3 4 5 6 7 8	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So those people were the ones that reached out.	1 2 3 4 5 6 7 8	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from those trips 695. Q. Okay. Athat I can remember.
1 2 3 4 5 6 7 8 9 10	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So	1 2 3 4 5 6 7 8 9 10	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from those trips 695. Q. Okay. Athat I can remember.
1 2 3 4 5 6 7 8 9 10 11	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So those people were the ones that reached out. 681. Q. Who were those people? A. Do you want me to name drop? 682. Q. Yes, please. Let's just make a list	1 2 3 4 5 6 7 8 9 10 11	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from those trips 695. Q. Okay. Athat I can remember. 696. Q. And when you go to countries and meet with them, you were with your dad. Right? A. M'hmm.
1 2 3 4 5 6 7 8 9 10 11 12	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So those people were the ones that reached out. 681. Q. Who were those people? A. Do you want me to name drop? 682. Q. Yes, please. Let's just make a list if you can remember their first or their last name.	1 2 3 4 5 6 7 8 9 10 11 12	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from those trips 695. Q. Okay. Athat I can remember. 696. Q. And when you go to countries and meet with them, you were with your dad. Right? A. M'hmm. 697. Q. And were you present at the meetings
1 2 3 4 5 6 7 8 9 10 11 12 13	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So those people were the ones that reached out. 681. Q. Who were those people? A. Do you want me to name drop? 682. Q. Yes, please. Let's just make a list if you can remember their first or their last name. A. Okay. So for sure the one, Claudia	1 3 4 5 6 7 8 9 10 11 12 13	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from those trips 695. Q. Okay. Athat I can remember. 696. Q. And when you go to countries and meet with them, you were with your dad. Right? A. M'hmm. 697. Q. And were you present at the meetings with these people or was it your dad and not
1 2 3 4 5 6 7 8 9 10 11 12 13 14	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So those people were the ones that reached out. 681. Q. Who were those people? A. Do you want me to name drop? 682. Q. Yes, please. Let's just make a list if you can remember their first or their last name. A. Okay. So for sure the one, Claudia Santos. I believe that was her last name. There	1 3 4 5 6 7 8 9 10 11 12 13 14	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from those trips 695. Q. Okay. Athat I can remember. 696. Q. And when you go to countries and meet with them, you were with your dad. Right? A. M'hmm. 697. Q. And were you present at the meetings with these people or was it your dad and not yourself?
1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So those people were the ones that reached out. 681. Q. Who were those people? A. Do you want me to name drop? 682. Q. Yes, please. Let's just make a list if you can remember their first or their last name. A. Okay. So for sure the one, Claudia Santos. I believe that was her last name. There was	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	T. Josun - 113 693. Q. Right. Athat are coming to me that we've discussed already. 694. Q. Okay. A. Those were the main people from those trips 695. Q. Okay. Athat I can remember. 696. Q. And when you go to countries and meet with them, you were with your dad. Right? A. M'hmm. 697. Q. And were you present at the meetings with these people or was it your dad and not yourself? A. It was not me. So again, like I
1 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So those people were the ones that reached out. 681. Q. Who were those people? A. Do you want me to name drop? 682. Q. Yes, please. Let's just make a list if you can remember their first or their last name. A. Okay. So for sure the one, Claudia Santos. I believe that was her last name. There was 683. Q. And what country was Claudia?	1 3 4 5 6 7 8 9 10 11 12 13 14	 T. Josun - 113 Q. Right. Athat are coming to me that we've discussed already. Q. Okay. A. Those were the main people from those trips Q. Okay. Athat I can remember. Q. And when you go to countries and meet with them, you were with your dad. Right? A. M'hmm. A. M'hmm. Q. And were you present at the meetings with these people or was it your dad and not yourself? A. It was not me. So again, like I said I was a part of the big group, the seminar
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 14 5 10 10 10 10 10 10 10 10 10 10 10 10 10	T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So those people were the ones that reached out. 681. Q. Who were those people? A. Do you want me to name drop? 682. Q. Yes, please. Let's just make a list if you can remember their first or their last name. A. Okay. So for sure the one, Claudia Santos. I believe that was her last name. There was 683. Q. And what country was Claudia? A. Sorry. She's Portugal. 684. Q. Right.	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 14 5 6 7 8 9 10 11 12 3 14 5 10 10 11 12 10 10 11 10 10 10 10 10 10 10 10 10 10	 T. Josun - 113 G93. Q. Right. Athat are coming to me that we've discussed already. G94. Q. Okay. A. Those were the main people from those trips G95. Q. Okay. Athat I can remember. G96. Q. And when you go to countries and meet with them, you were with your dad. Right? A. M'hmm. G97. Q. And were you present at the meetings with these people or was it your dad and not yourself? A. It was not me. So again, like I said I was a part of the big group, the seminar G98. Q. Right. Aand then I would be sitting at
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 2 11 2 11 2 11 2 11 2 11 2 11 2	 T. Josun - 111 have a huge following here. Like they really want to meet you." That's the reason why we 680. Q. Sure. Astarted to do the traveling was because there was that calling for it. There were so many people out there that had so many questions and really wanted to get to know everything. So those people were the ones that reached out. 681. Q. Who were those people? A. Do you want me to name drop? 682. Q. Yes, please. Let's just make a list if you can remember their first or their last name. A. Okay. So for sure the one, Claudia Santos. I believe that was her last name. There was 683. Q. And what country was Claudia? A. Sorry. She's Portugal. 684. Q. Right. A. There was Paul from Ireland and I want to say his last name was McCarthy or something to that 685. Q. Okay. Take that, Ireland. Yes. 	1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	 T. Josun - 113 G93. Q. Right. Athat are coming to me that we've discussed already. G94. Q. Okay. A. Those were the main people from those trips G95. Q. Okay. Athat I can remember. G96. Q. And when you go to countries and meet with them, you were with your dad. Right? A. M'hmm. G97. Q. And were you present at the meetings with these people or was it your dad and not yourself? A. It was not me. So again, like I said I was a part of the big group, the seminar G98. Q. Right. Aand then I would be sitting at the back of the room and at the end of each seminar he would introduce me. I would stand up and wave and he would say, "If there's any questions that you guys have or anything that you want her to take

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	Sheet 30 Page 114		_ Page 116
	T. Josun - 114		T. Josun - 116
11	699. Q. Right.	1	Broker thing I don't ask my dad about anything.
2		2	
	Atyping questions, names, numbers,	23	development. He's the guy that will never work a
3	this, that. These are the issues, these are the		
4	issues. And then that would be it.	4	9:00 to 5:00 job.
5	700. Q. Okay. Okay.	5	
6	A. If he had any personal meetings, I'm	6	A. Ever.
7	not sure. We had separate rooms. We didn't		709. Q. But what's he doing now?
8	obviously share a room or anything like that. I had	8	A. You would have to ask him.
9	my own room. He had his own hotel room.	9	710. Q. Okay. Real Profit Limited, does
10	701. Q. Okay. Okay.	10	that name
11	A. So basically this is how it worked.	11	A. That doesn't
12	The hosts essentially were the ones who picked a	12	711. Q. Is that familiar? Kulrock
13	place to hold the seminars. You tell me you have so	13	Marketing?
	many hundreds of people that are willing to come	14	A. No.
15	together, get them together. They would pick us up	15	712. Q. Kul Branding and Promotions?
16	from the airport, they would drop us off at a hotel.	16	A. No.
14 15 16 17	My dad and I had our own rooms. Because the	117	713. Q. Digital Achievements?
18	European flights mostly were overnight so we would	18	A. No.
19	leave Toronto overnight, get there like 7:00, 8:00,	19	714. Q. And do you know a gentleman by the
20	9:00	20	name of John Rock?
21	702. Q. Sure.	21	A. I'm 90 percent positive it was Raj
22	Ao'clock in the morning. Go to	22	who brought him on.
19 20 21 22 23	the hotel. We would eat something. Go to our	23	715. Q. Right.
24	rooms, check in. Have that day to kind of relax.	24	A. I don't know again, how they knew
25	The next day was the seminar.	25	each other or anything like that from previous but
	Page 115	, <u> </u>	Page 117
	Page 115 T. Josun - 115	, <u> </u>	Page 117 T. Josun - 117
1	T. Josun - 115 Then, the day after that would be	1	Page 117 T. Josun - 117 he was more or a consultant. I met him when I was
1	T. Josun - 115 Then, the day after that would be sightseeing if we were lucky	1 2	Fage 117 T. Josun - 117 he was more or a consultant. I met him when I was working at the Oshawa office.
1 2 3	T. Josun - 115 Then, the day after that would be sightseeing if we were lucky 703. Q. Right.	1 2 3	T. Josun - 117 he was more or a consultant. I met him when I was working at the Oshawa office. 716. Q. Okay. And
1 2 3 4	T. Josun - 115 Then, the day after that would be sightseeing if we were lucky 703. Q. Right. Aand then if there was a huge	1 2 3 4	 Fage 117
1 2 3 4 5	T. Josun - 115 Then, the day after that would be sightseeing if we were lucky 703. Q. Right. Aand then if there was a huge response in that country and they had to do a second	1 2 3 4 5	 Page 117
1 2 3 4 5 6	T. Josun - 115 Then, the day after that would be sightseeing if we were lucky 703. Q. Right. Aand then if there was a huge response in that country and they had to do a second seminar, then there would be the second, like the	1 2 3 4	Page 117 T. Josun - 117 he was more or a consultant. I met him when I was working at the Oshawa office. 716. Q. Okay. And A. And he was the one who brought Grant on, the HR guy. 717. Q.
1 2 3 4 5 6 7	T. Josun - 115 Then, the day after that would be sightseeing if we were lucky 703. Q. Right. Aand then if there was a huge response in that country and they had to do a second seminar, then there would be the second, like the third day would be the seminar or we would be out of	1 2 3 4 5 6 7	Page 117 T. Josun - 117 he was more or a consultant. I met him when I was working at the Oshawa office. 716. Q. Okay. And A. And he was the one who brought Grant on, the HR guy. 717. Q. Okay. A. Sorry.
1 2 3 4 5 6 7 8	T. Josun - 115 Then, the day after that would be sightseeing if we were lucky 703. Q. Right. Aand then if there was a huge response in that country and they had to do a second seminar, then there would be the second, like the third day would be the seminar or we would be out of there. Like three, four days, three, four days,	1 2 3 4 5 6 7 8	Page 117 T. Josun - 117 he was more or a consultant. I met him when I was working at the Oshawa office. 716. Q. Okay. And A. And he was the one who brought Grant on, the HR guy. 717. Q. Okay. A. Sorry. 718. Q. Okay. Now you were just working at
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1 2 3 4 5 6 7 8 9 10 11	 T. Josun - 115 Then, the day after that would be sightseeing if we were lucky 703. Q. Right. Aand then if there was a huge response in that country and they had to do a second seminar, then there would be the second, like the third day would be the seminar or we would be out of there. Like three, four days, three, four days, at the most. 704. Q. Okay. Now have you ever been to Switzerland with your dad? 	1 2 3 4 5 6 7 8 9 10 11	Page 117 T. Josun - 117 he was more or a consultant. I met him when I was working at the Oshawa office. The met him when I was working at the Oshawa office. 716. Q. Okay. And A. And he was the one who brought Grant on, the HR guy. 717. Q. Okay. 718. Q. Okay. Now you were just working at the Oshawa office for a few months A. Correct. 719. Q. at the end prior to leaving.
1 2 3 4 5 6 7 8 9 10 11 12	 Then, the day after that would be sightseeing if we were lucky 703. Q. Right. 703. Aand then if there was a huge response in that country and they had to do a second seminar, then there would be the second, like the third day would be the seminar or we would be out of there. Like three, four days, three, four days, at the most. 704. Q. Okay. Now have you ever been to Switzerland with your dad? A. No. I've never been to Switzerland. 	1 2 3 4 5 6 7 8 9 10 11 12	Page 117 T. Josun - 117 he was more or a consultant. I met him when I was working at the Oshawa office. The Was more of a consultant. I met him when I was working at the Oshawa office. 716. Q. Okay. And A. And he was the one who brought Grant on, the HR guy. 717. Q. Okay. 718. Q. Okay. Now you were just working at the Oshawa office for a few months A. Correct. 719. Q. at the end prior to leaving. Right? Right
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1 2 3 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 13 14 5 16 7 8 9 0 11 12 13 14 15 16 17 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	 Then, the day after that would be sightseeing if we were lucky 703. Q. Right. Aand then if there was a huge response in that country and they had to do a second seminar, then there would be the second, like the third day would be the seminar or we would be out of there. Like three, four days, three, four days, three, four days at the most. 704. Q. Okay. Now have you ever been to Switzerland with your dad? A. No. I've never been to Switzerland. 705. Q. Okay. I'm just going to give you the names of some companies which we're trying to determine if they're associated with Banners Broker and some of them have names that are similar to your father so you could just let me know if you've ever heard of these companies. Kulclub? A. No. I've never heard of that one. 706. Q. Anything to do with Kulclub. Kulclub UK, Kulclub Portugal? Have you ever heard of 	$ \begin{array}{c} 1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\\24\end{array} $	 Page 117
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 10 1 1 2 3 4 5 10 1 1 1 2 1 1 2 3 1 1 1 1 1 2 1 1 1 1 1 1	 Then, the day after that would be sightseeing if we were lucky 703. Q. Right. Aand then if there was a huge response in that country and they had to do a second seminar, then there would be the second, like the third day would be the seminar or we would be out of there. Like three, four days, three, four days, three, four days at the most. 704. Q. Okay. Now have you ever been to Switzerland with your dad? A. No. I've never been to Switzerland. 705. Q. Okay. I'm just going to give you the names of some companies which we're trying to determine if they're associated with Banners Broker and some of them have names that are similar to your father so you could just let me know if you've ever heard of these companies. Kulclub? A. No. I've never heard of that one. 706. Q. Anything to do with Kulclub. Kulclub UK, Kulclub Portugal? Have you ever heard of A. No. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Page 117 T. Josun - 117 he was more or a consultant. I met him when I was working at the Oshawa office. 716. 716. Q. Okay. And A. And he was the one who brought Grant on, the HR guy. 717. Q. Okay. 718. Q. Okay. Now you were just working at the Oshawa office for a few months A. Correct. 719. Q. at the end prior to leaving. Right? A. Correct. 720. Q. Okay. I think those are my questions. I'm just going to take a break and then we'll come back in five minutes and we'll let you know if we're done. Okay? A BRIEF RECESS TARA JOSUN, resumed CONTINUED EXAMINATION BY MR. WARD:

	Sheet 31 Page 118		Page 120
	T. Josun - 118		T. Josun - 120
1	Exhibit J1 on	1	can't confirm it. I believe he was from Ireland
2	A. Sorry. I just wanted to make a	2	735. Q. Okay.
3	clarification on some things.	23	AI believe. And I know that John
4	722. Q. Okay. Yes. By all means. But we	4	Rock and Rajiv were the ones dealing with a lot of
5	will need to mark that as an Exhibit.		the issues with him in the sense like he was just
6	A. Yes, yes. That's fine.	5	like threats. That's all I really got from it was
7	723. Q. Yes. Yes. And so, can you just put	7	that he was threatening them.
8	a stamp on it? Yes, just stamp the back of it if	8	736. Q. Did your father Kul Josun, did he
9	you don't mind.	9	have a friend by the name of Dr. Levin or Mr. Levin,
10	A. Right here?	10	something similar to that?
11	724. Q. Yes. And could you just write J1 on	11	A. So again, I can't confirm that for
12	it, as well, for me?	12	you. Out of that Oshawa office, Kul was hardly ever
13	A. Just on the	13	there. He would come once in a blue moon but it was
14	725. Q. Sure.	14	just I remember Raj and John being on the phone with
15	A. Right here?	15	like a doctor
16	726. Q. Anywhere that looks fine.	16	737. Q. Right.
17	A. Exhibit number?	17	Abut other than that like
18	727. Q. Yes. Thanks. Okay.	18	738. Q. When you traveled around Europe with
19	•	19	your dad did you ever meet someone who went by the
19 20	EXHIBIT NO. J1: Excerpt from an affidavit of Tara	20	name of Dr. Levin or Mr. Levin?
21	Josun prepared by Toronto Police	21	A. No. I never met him.
22	following an interview with the	22	739. Q. Okay. And Switzerland, you've never
21 22 23 24	Competition Bureau.	23	been to Switzerland you've told us. To your
24		24	knowledge has your father ever been to Switzerland?
25	BY MR. WARD:	25	A. I can't confirm that. Like I have
	Page 119		Page 121 T locus 101
	T. Josun - 119		T. Josun - 121
1	T. Josun - 119 728. Q. Couple names I'm going to put you	1	T. Josun - 121 no idea.
1	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman	1 2	T. Josun - 121 no idea. 740. Q. One way or the other? You don't
1 2 3	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin?	1 2 3	T. Josun - 121 no idea. 740. Q. One way or the other? You don't know at all whether
1 2 3	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin? A. Dr. Levin?	1 2 3 4	T. Josun - 121 no idea. 740. Q. One way or the other? You don't know at all whether A. No. I don't know.
1 2 3 4 5	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin? A. Dr. Levin? 729. Q. Yes. Or a Levin?	1 2 3 4 5	T. Josun - 121 no idea. 740. Q. One way or the other? You don't know at all whether A. No. I don't know. 741. Q. Okay. And I'm interested in
1 2 3 4 5 6	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin? A. Dr. Levin? 729. Q. Yes. Or a Levin? A. I remember a doctor. It was like a	1 2 3 4	T. Josun - 121 no idea. 740. Q. One way or the other? You don't know at all whether A. No. I don't know. 741. Q. Okay. And I'm interested in specifically the Cypress part of your trip when you
1 2 3 4 5 6 7	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin? A. Dr. Levin? 729. Q. Yes. Or a Levin? A. I remember a doctor. It was like a foreign name.	1 2 3 4 5 6 7	T. Josun - 121 no idea. 740. Q. One way or the other? You don't know at all whether A. No. I don't know. 741. Q. Okay. And I'm interested in specifically the Cypress part of your trip when you were in Europe.
1 2 3 4 5 6 7	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin? A. Dr. Levin? 729. Q. Yes. Or a Levin? A. I remember a doctor. It was like a foreign name. 730. Q. Right.	1 2 3 4 5 6 7 8	T. Josun - 121 no idea. 740. Q. One way or the other? You don't know at all whether A. No. I don't know. 741. Q. Okay. And I'm interested in specifically the Cypress part of your trip when you were in Europe. A. Okay. I believe that was my last
1 2 3 4 5 6 7 8 9	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin? A. Dr. Levin? 729. Q. Yes. Or a Levin? A. I remember a doctor. It was like a foreign name. 730. Q. Right. A. It was a little bit longer I think	1 2 3 4 5 6 7 8 9	T. Josun - 121 no idea. 740. Q. One way or the other? You don't know at all whether A. No. I don't know. 741. Q. Okay. And I'm interested in specifically the Cypress part of your trip when you were in Europe. A. Okay. I believe that was my last trip I took actually and that's when I decided I
1 2 3 4 5 6 7 8 9 10	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin? A. Dr. Levin? 729. Q. Yes. Or a Levin? A. I remember a doctor. It was like a foreign name. 730. Q. Right. A. It was a little bit longer I think than that. Dr. Levin. There was a doctor. Can't	1 2 3 4 5 6 7 8 9 10	T. Josun - 121 no idea. 740. Q. One way or the other? You don't know at all whether A. No. I don't know. 741. Q. Okay. And I'm interested in specifically the Cypress part of your trip when you were in Europe. A. Okay. I believe that was my last trip I took actually and that's when I decided I didn't want to travel anymore and then that's when I
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1 2 3 4 5 6 7 8 9 10 11 12	T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin? A. Dr. Levin? 729. Q. Yes. Or a Levin? A. I remember a doctor. It was like a foreign name. 730. Q. Right. A. It was a little bit longer I think than that. Dr. Levin. There was a doctor. Can't confirm. Honestly, I can't confirm the name but there was. Not that I had anything	1 2 3 4 5 6 7 8 9 10 11 12	T. Josun - 121 no idea. 740. Q. One way or the other? You don't know at all whether A. No. I don't know. 741. Q. Okay. And I'm interested in specifically the Cypress part of your trip when you were in Europe. A. Okay. I believe that was my last trip I took actually and that's when I decided I didn't want to travel anymore and then that's when I started working in Oshawa. 742. Q. And why did you go to Cypress and
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1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 14 5 6 7 8 9 10 11 12 11 11	 T. Josun - 119 728. Q. Couple names I'm going to put you and just tell me if you've ever heard of a gentleman by the name of Dr. Levin? A. Dr. Levin? 729. Q. Yes. Or a Levin? A. I remember a doctor. It was like a foreign name. 730. Q. Right. A. It was a little bit longer I think than that. Dr. Levin. There was a doctor. Can't confirm. Honestly, I can't confirm the name but there was. Not that I had anything 731. Q. M'hmm. Alike directly but just from overhearing and stuff like that. The Oshawa office was very small. 732. Q. Right. A. The walls were pretty thin so 733. Q. What did you overhear? Like just tell me everything about Dr. Levin. A. Again, I don't know if that's the same person we're talking about. What's the purpose? 	$\begin{array}{c}1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\7\\8\\9\\20\\21\\22\\23\end{array}$	 T. Josun - 121 no idea. Q. One way or the other? You don't know at all whether A. No. I don't know. Q. Okay. And I'm interested in specifically the Cypress part of your trip when you were in Europe. A. Okay. I believe that was my last trip I took actually and that's when I decided I didn't want to travel anymore and then that's when I started working in Oshawa. Q. And why did you go to Cypress and what exactly did you do in Cypress? A. What did I do? Q. Yes. Or what did you see in relation to Banners? A. Okay. So again, Cypress was just another big following. Mr. Douther had reached out to us and said, "We have a huge following here. Can you guys come out and do a seminar?" "Okay. No problem." Me and Kul went over and again there was a presentation and I can only remember for sure the one. I think there was only the one presentation.

	ob		4 J O
	Sheet 32 Page 122 T. Josun - 122		T. Josun - 124
1	stuff. All I can remember for sure is the one	1 1	755. Q. Yes. Okay. And then last question,
2	seminar. It was just like any other trip.	2	I think it's the last question, I want to go back to
3	744. Q. Do you remember meeting anyone other	3	the very beginning when you first started working at
	than Douther, the gentleman that you mentioned?	4	Banners Brokers International Limited
4			
5	A. Other than Douther, I met his wife,	5	
6	I met his daughter. He had a friend there, as well.	6	756. Qon February the 7th, 2012.
7	It was Mr. Douther and another gentleman who picked	7	A. Okay.
8	us up from the airport. I can't remember his name	8	757. Q. How was it that you came to move
9	at all.	9	from the Tim Hortons to Banners? Like how was it
10	745. Q. Okay.	10	that you even came to apply there?
11	A. So, Cypress is basically, and again		A. So I finished my placement with CDI
12	I'm not sure if I'm getting the directions right,	12	at the end of January. The month of February was
13	but I think the south side is the Greek and the	13	just whatever. I had handed in my hours. I had
14	north side is more Turkish, so I guess there were a	14	finished. I had completed by curriculum
15	lot of Turkish people that had come to the seminar,	15	758. Q. M'hmm.
16	but like I mean I can't tell you exact name and this	16	Aso everything like that was done.
16 17		17	So with the CDI, it was Everest, I guess had bought
	and that but so we had basically two hosts I guess		them out and then CDI was able to buy back their
18	you could say.	18	
19	746. Q. Right.	19	rights, so the private college was in a mish mash of
20	A. It was Mr. Douther and the other	20	whatever
21	gentleman.	21	759. Q. M'hmm.
22	747. Q. Okay. And just to be clear, I think	22	Aso I finished my program and
23	you mentioned your step-father at one point earlier	23	everything like that but our career services lady
24	this afternoon and so Kuldip Josun, I presume that	24	had left and a new girl came in and she didn't
25		25	really help us out that much because we were so
20	he's your real father?	20	Teally help us out that much because we were so
	Page 123		Page 125 T. Laure 105
	T. Josun - 123		T. Josun - 125
1	T. Josun - 123	1	T. Josun - 125 close to finishing she couldn't help the majority of
1	T. Josun - 123 A. He's my biological father. Yes.	1	T. Josun - 125 close to finishing she couldn't help the majority of
1 2	T. Josun - 123 A. He's my biological father. Yes. 748. Q. Biological father. Okay.	1 2	T. Josun - 125 close to finishing she couldn't help the majority of us find a placement. A lot of us got lost. A lot
1 2 3	T. Josun - 123 A. He's my biological father. Yes. 748. Q. Biological father. Okay. A. M'hmm.	1 2 3	T. Josun - 125 close to finishing she couldn't help the majority of us find a placement. A lot of us got lost. A lot of us just didn't finish it. They had to go back.
1 2 3 4	T. Josun - 123 A. He's my biological father. Yes. 748. Q. Biological father. Okay. A. M'hmm. 749. Q. And so your parents were divorced at	1 2 3 4	T. Josun - 125 close to finishing she couldn't help the majority of us find a placement. A lot of us got lost. A lot of us just didn't finish it. They had to go back. I got lucky because my professor remembered an old
1 2 3 4 5	T. Josun - 123 A. He's my biological father. Yes. 748. Q. Biological father. Okay. A. M'hmm. 749. Q. And so your parents were divorced at some point and	1 2 3 4 5	T. Josun - 125 close to finishing she couldn't help the majority of us find a placement. A lot of us got lost. A lot of us just didn't finish it. They had to go back. I got lucky because my professor remembered an old student who just worked downtown across from Old
1 2 3 4 5 6	T. Josun - 123 A. He's my biological father. Yes. 748. Q. Biological father. Okay. A. M'hmm. 749. Q. And so your parents were divorced at some point and A. My parents divorced when I was 12.	1 2 3 4 5 6	T. Josun - 125 close to finishing she couldn't help the majority of us find a placement. A lot of us got lost. A lot of us just didn't finish it. They had to go back. I got lucky because my professor remembered an old student who just worked downtown across from Old City Hall
1 2 3 4 5 6 7	T. Josun - 123 A. He's my biological father. Yes. 748. Q. Biological father. Okay. A. M'hmm. 749. Q. And so your parents were divorced at some point and A. My parents divorced when I was 12. Twelve, thirteen years now?	1 2 3 4 5 6 7	T. Josun - 125 close to finishing she couldn't help the majority of us find a placement. A lot of us got lost. A lot of us just didn't finish it. They had to go back. I got lucky because my professor remembered an old student who just worked downtown across from Old City Hall 760. Q. M'hmm.
1 2 3 4 5 6 7 8	T. Josun - 123 A. He's my biological father. Yes. 748. Q. Biological father. Okay. A. M'hmm. 749. Q. And so your parents were divorced at some point and A. My parents divorced when I was 12. Twelve, thirteen years now? 750. Q. Okay. Okay.	1 2 3 4 5 6 7 8	T. Josun - 125 close to finishing she couldn't help the majority of us find a placement. A lot of us got lost. A lot of us just didn't finish it. They had to go back. I got lucky because my professor remembered an old student who just worked downtown across from Old City Hall 760. Q. M'hmm. Aand Highway Traffic, and traffic
1 2 3 4 5 6 7 8 9	T. Josun - 123 A. He's my biological father. Yes. 748. Q. Biological father. Okay. A. M'hmm. 749. Q. And so your parents were divorced at some point and A. My parents divorced when I was 12. Twelve, thirteen years now? 750. Q. Okay. Okay. A. They don't even like speak a word.	1 2 3 4 5 6 7 8 9	T. Josun - 125 close to finishing she couldn't help the majority of us find a placement. A lot of us got lost. A lot of us just didn't finish it. They had to go back. I got lucky because my professor remembered an old student who just worked downtown across from Old City Hall 760. Q. M'hmm. Aand Highway Traffic, and traffic tickets and stuff like that. So anyway, I completed
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			T. Josun - 12	3		Т	Josun - 128
		763.	Q. Right.	1	770	THE DEPONENT: I was just not awa	are.
	2		A. I did not know her at that time but	2	776.	MR. WARD: You	
	3	We J	ust had lunch and I showed him my resume. I was	3		THE DEPONENT: I knew what I was	
	4 5		nanager at Tim Hortons. I was the Manager for			know. I knew what I was given. I was	d
	5 6		years. I was running two locations for them.	456		trainer. I had training materials from the company and then that was basically it.	
		764.	s young. Q. M'hmm.		777.	MR. WARD: So at the time you had	d no
	8	704.	A. I guess my resume at that time was	8	111.	idea who had paid for the car?	
	9	reall	y appealing to what he was looking for.	9		THE DEPONENT: No. All I knew wa	is I was
		765.	Q. Okay. Okay.	110		at the office and Raj came and handed	
1			A. Like I don't know	111		signed money order and he's like, "On y	/our
		766.	Q. Okay. So the introduction came	12		way home, drop it off and then they'll ca	all
	3	throu	ugh Kul, right, to Banners?	13		you when you can pick up your car.	
	4		A. Yes.	14	778.	MR. WARD: Okay. Good. Thank y	/ou for
		767.	Q. Yes, okay. Fair enough.	15		that.	
	6	14/1	A. I was looking for work. It was,	16	770	THE DEPONENT: I just	
1			t do you think?" So I guess you could say	17	779.	MR. WARD: I appreciate that.	optuuith
11			essional in a sense where it wasn't, you know,	18		THE DEPONENT: I had no involvem	
2		was.	addy's girl and daddy just gave me a job. It	20		any money or anything like that. I was a employee.	
2	1 7	768.	Q. You had the interview.	21	780.	MR. WARD: Okay. Great. I think v	ve're
22	2 1	,	A. Exactly.	22		done for today. Thanks very much, Ms.	
23	37	769.	Q. Okay.	23		Josun.	
24	4		A. I had a formal interview with an	24		THE DEPONENT: Thank you.	
25	5	unbia	ased party.		<u></u>		
	_ Pa	ge 127	T		Page 129	T_ lo	sun - 129
	1 7	770	T. Josun - 127			1.30	Sull - 125
	17 2	770. aues	Q. Okay. Good. Gillian. any other tions?				
	3	ques	MS. GOLDBLATT: No.	1		INDEX OF EXHIBITS	
		771.	MR. WARD: Mr. Ellis?	2			
5	5		MR. ELLIS: No.	3		PAGE	
6	67	772.	MR. WARD: Ms. Craddock?		EXHIBIT		
7				5	exhibit Number		NUMBER
			MS. CRADDOCK: No.	6		DESCRIPTION	NUMBER
8	8		THE DEPONENT: Can I actually clarify	6	NUMBER J1 E	DESCRIPTION	NUMBER
8	9		THE DEPONENT: Can I actually clarify something?	6	NUMBER J1 E of	DESCRIPTION Excerpt from an affidavit Tara Josun prepared by	NUMBER
10 10	9) 7	73.	THE DEPONENT: Can I actually clarify something? MR. WARD: Yes.	6	NUMBER J1 E of To	DESCRIPTION Excerpt from an affidavit Tara Josun prepared by pronto Police following an interview	
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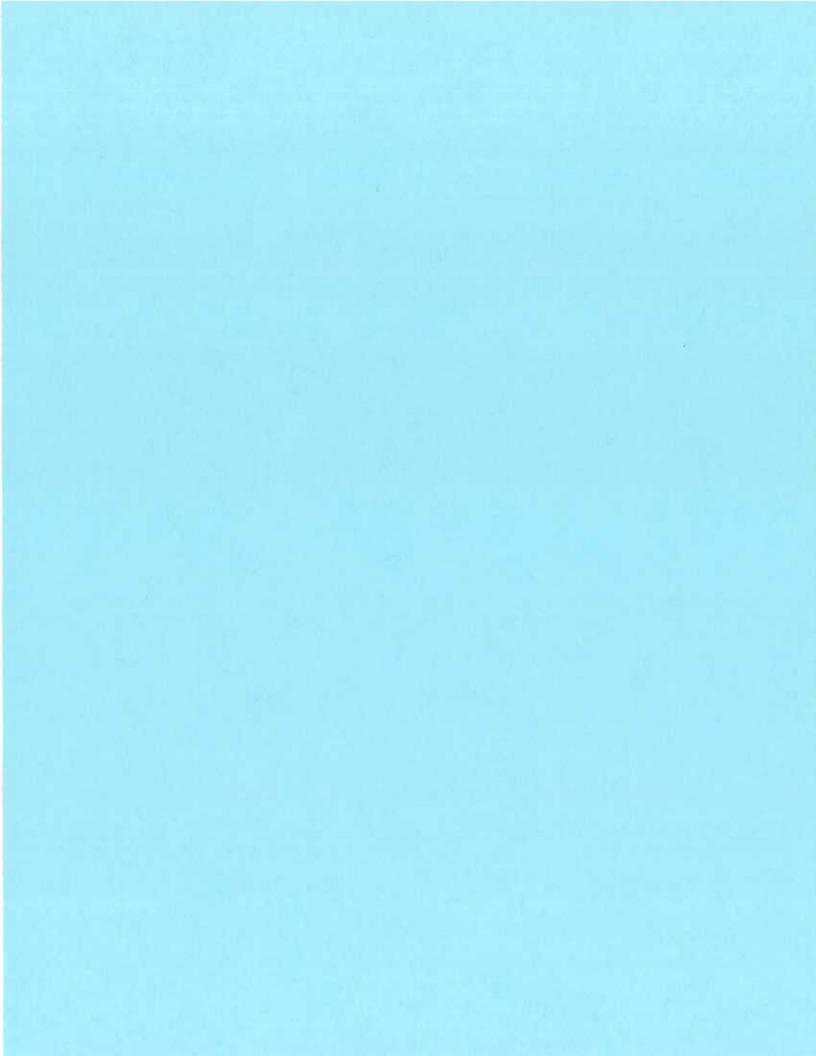
REPORTER'S NOTE:

Please be advised that any undertakings, objections, under advisements and refusals are provided as a service to all counsel, for their guidance only, and do not purport to be legally binding or necessarily accurate and are not binding upon Victory Verbatim Reporting Services Inc.

I hereby certify the foregoing to be a true and accurate transcription of the above-noted proceedings held before me on the 26th DAY OF FEBRUARY, 2015, and taken to the best of my skill, ability and understanding.

Certified Correct:

Greg Vaughan Verbatim Reporter



Sheet 1 Page 1

Court File No. CV-14-10663-00CL

ONTARIO SUPERIOR COURT OF JUSTICE (Commercial List)

MD/ak

IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1992, c. 27, s.2, AS AMENDED

AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE ISLE OF MAN WITH RESPECT TO BANNERS BROKER INTERNATIONAL LIMITED

APPLICATION OF MILES ANDREW BENHAM AND PAUL ROBERT APPLETON, IN THEIR CAPACITY AS JOINT LIQUIDATORS OF BANNERS BROKER INTERNATIONAL LIMITED, UNDER PART XIII OF THE BANKRUPTCY AND INSOLVENCY ACT (CROSS-BORDER INSOLVENCIES)

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This is the Examination of STEPHANIE ROSE SCHLACHT, pursuant to Part XIII of the Bankruptcy and Insolvency Act, taken at the offices of Cassels Brock, Suite 2100, Scotia Plaza, 40 King Street West, Toronto, Ontario, on the 29th day of April, 2015.

Sheet 2 Page 2	Page 4
APPEARANCES: DAVID WARD for the Receiver LARRY ELLIS ERIN CRADDOCK CHRISTOPHER HORKINS JEREMY MARTIN KAREN DOSANJH for Stephanie Rose Schlacht Also Present: Gillian Goldblatt Philip H. Gennis	S. R. Schlacht - 4 STEPHANIE ROSE SCHLACHT, affirmed EXAMINATION BY MR. WARD: 1. Q. Good morning Mrs. Dixit. 4. A. I still have my formal last name. 5. Q. Could you state your full name 6 please for the record. 7. A. Yes. Stephanie Rose Schlacht. 8. 3. Q. Okay. And, could you spell your 9 last name for the reporter please? 10 A. S-C-H-L-A-C-H-T. 11 4. Q. Okay. And is Roseand Rose I take 12 it is your 13 A. It's my middle name. 14 5. Q. Okay. And are you still living at 15 1036 Coyston Court, Oshawa? 16 A. That's correct. 17 6. Q. And I understand that you have a 18 degree from Trinity Western University, from 2009? 19 A. That's correct. 20 7. Q. And that's a Bachelor of Education? 21 A. That is, yes. 22 8. Q. Now, prior to your involvement with 23 Banners Broker, can you tell mewhat was the 24 nature of your work experience, if any, prior to 25 Banners Broker?
Page 3	Page 5
S. R. Schlacht - 3 INDEX OF PROCEEDINGS PAGE NUMBER STEPHANIE ROSE SCHLACHT, affirmed Examination by Mr. Ward 4 - 182	S. R. Schlacht - 5 A. Prior to Banners Broker, I worked at Cactus Club, which is a restaurant in Vancouver, B.C. 9. Q. Okay. 5. A. And I had a few other employments, 6 but nothing significant. 7 10. Q. Okay. 8 A. And volunteered with teaching. 9 11. Q. Okay. 8 A. And volunteered with teaching. 9 11. Q. Okay. And did you work at Joey's in 10 the Eaton Centre, as well? 11 A. Oh yes I did. Briefly. 12 12. Q. Any other employment, apart from 13 A. I worked briefly at Brant House. 14 13. Q. Brant House? 15 A. That's correct. 16 14. Q. Okay. And what is that? 17 A. It's a bar, just on King Street.
Index of Exhibits 183 Certificate 184	 18 15. Q. All right. And, apart from your 19 degree at Trinity Western University, did youdo 20 you have any other college degrees, diplomas, or 21 academic qualifications? 22 A. No. 23 16. Q. So, in terms of Banners Broker, what 24 was yourmaybe you can start by just describing 25 for me how you came to know Banners Broker. What

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	Shee	t 3 Page 6		Page	₈ 46
	Silee	S. R. Schlacht - 6		raye	S. R. Schlacht - 8
1		was your introduction to the business?	1		Banners Broker Limited.
2		A. Introduction to Banners Broker	2	27.	
3		International? Limited? Can you be more specific?	23		you were hired to be a personalwas there a title
		Sorry.	4		that went with it, or?
4	17.	Q. Well, I wasI can be more specific	4		A. Um
67		if it helps, but I was just speaking generally.	6	28.	
		When washow and when did you first come in to	7		assistant? What was your
8		contact with Banners Broker? Any kind of Banners	8		A. I'm not sure of the exact title, to
9		Broker?	9		be honest.
10		A. I came into contact when I was	10	29.	
11		working at Joey's. I had a girlfriend that I worked		• •	A. I would have to look in
12	40	with thatone of her regulars was Kuldip.	12	30.	
13	18.		13		Josun?
14		A. That's correct. And he was looking	14	04	A. Yes.
15		for an assistant, and it was actually that person	15	31.	
16 17	19.	that brought that to my attention.	16 17	32.	A. My start date was sometime in May. Q. In 2012?
18	13.	Q. All right. A. And I was looking for employment	18	JZ.	A. In 2012, yes.
19		other than in the restaurant industry.	19	33.	Q. Okay. Andnow I understand that
19 20	20.		20	00.	your employment changed throughout the course of
21	LU.	terms of Banners Broker?	21		A. It did.
22		A. In terms of my employment working as	22	34.	Qthe history at Banners Broker.
23		Kuldip's assistant?	23	•	So, what was the first change?
24 25	21.		24		A. The first change when Kul was no
25		A. Yes. Sorry, I just have to think.	25		longerI don't know his employment, but I was no
					longerruunt know his employment, but i was ho
_	Page	7		Page	9
<u> </u>	Page	7 S. R. Schlacht - 7		Page	9 S. R. Schlacht - 9
1		S. R. Schlacht - 7 This was two years ago.	1	Page	9 S. R. Schlacht - 9 longer his assistant. I then went out Oshawa and I
1 2 2	Page 22.	S. R. Schlacht - 7 This was two years ago. Q. Sure.	1 2		9 S. R. Schlacht - 9 longer his assistant. I then went out Oshawa and I worked directly Rajiv Dixit.
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	Shee	t 4 Page 10		Page	12
	Direc	S. R. Schlacht - 10		rage	S. R. Schlacht - 12
1		Ayes.	1		A. Well, Raj was no longerBanners
2	42.	Q. And so is it fair to say that after	2		Broker International was no longer a client of
3		Kuldip left, you become Rajiv Dixit's assistant?	$\left\ \overline{3} \right\ $		Raj's.
4		A. Yes.	¥	57.	
5	43.	Q. And what type of work did you for	4 5	0,1	A. And, so a lot of the businessyou
6	10.	Rajiv? Like	6		know my jobmy main focus when I was his
7		A. I was his executive assistant, so	7		assistant, was assisting duties, as well the client
8		that could be anything, from getting meetings ready,	8		Banners Broker International. I did a lot with
9		taking notes, picking up dry cleaning.	9		that. So, I was no longer needed. The company
10	44.		110		downsized so much that there wasn't anything for me
11		what your specific responsibilities	11		to do really.
12		A. Okay, sure.	12	58.	Q. Okay. Now throughout the time
13	45.	Qwere. I just want to get the	13		period, from the time that you were hired as Kuldip
14		time period straight.	14		Josun's assistant in May of 2012
15		A. Yes.	15		A. M'hmm.
16	46.	Q. So, July 2012, which is when the	16	59.	Qup until August of 2013
17		Portugal	17		A. M'hmm.
18		Ă. Yes.	18	60.	
19	47.	Qconvention occurred. And that's	19		Banners Broker Limited?
20		when Mr. Josun left Banners Broker?	20		A. It's only ever been Banners Broker
21		A. M'hmm.	21		Limited.
22	48.	Q. You're working for Dixit, Mr. Dixit?	22	61.	
23		A. M'hmm.	23		Limited, okay. And did you have a written
24	49.	Q. And how long did you continue	24		employment contract?
25		working for Mr. Dixit?	25		A. Idid. I
<u> </u>					
	Page	11		Page	13
	Page	11 S. R. Schlacht - 11			S. R. Schlacht - 13
1	Page	S. R. Schlacht - 11 A. I worked for Mr. Dixit fromsorry	1	Page 62.	¹³ S. R. Schlacht - 13 Q. At any point.
1		A. I worked for Mr. Dixit fromsorry it's just hard to refer to my husband as Mr. Dixit.	1	62.	C. At any point. A. I did.
1 2 3	Page 50.	S. R. Schlacht - 11 A. I worked for Mr. Dixit fromsorry it's just hard to refer to my husband as Mr. Dixit. Q. Okay.	1 2 3		S. R. Schlacht - 13 Q. At any point. A. I did. Q. And tell me about that?
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	Shee	t 5 Page 14 S. R. Schlacht - 14		Page	S. R. Schlacht - 16
4		A. When I was hired by Banners Broker	1		A. Yes.
2		Limited.	2	83.	
23	71.			00.	Maythree/four-month period?
	71.				A. M'hmm.
4		And do you recall your salary at the time when you	4	01	
5		were first hired?	6	84.	
6		A. I couldn't be certain. It was			A. Sorry, what was the question. I
	70	around like 40,000. Maybe a little bit lower.			didn't get very much sleep. Can you repeat that,
8	72.		8	05	sorry?
9		A. Maybe a little bit higher. A year,	9	85.	Q. Okay. Socan you describe for me,
10	70	yes.	10		please, what your duties were at Banners Broker
11	73.				Limited during the initial three or four-month
12		employment agreement that you made when you were	12		period when you were working with Mr. Josun?
13		first hired by Banners Broker Limited, were there	13	•••	A. Um
14		any other employment agreements that you had at any	14	86.	Q. And I wantand just before you
15		time?	15		answer, I want to understand everything
16		A. Not to my knowledge.	16		A. Okay.
17	74.		17	87.	
18		initial employment, was it ever amended or changed	18		like within the Banners Broker organization.
19		in any way?	19		A. Mainly, I was being trained by the
20		A. I can't beI'm not sure. I can't	20		client on the Banners Broker program to understand
21		remember.	21		how the program worked. And the convention was
22	75.	Q. Okay. So, you don't	22		being planned, so I had responsibilities with that.
23		remembersitting here today you don't remember	23		And that was mainly all that I did up until I moved,
24		signing any	24		or sorry, up until Kuldip was no longer in the
25		A. I don't remember signing that.	25		picture.
:	Page			Page	17
		S. R. Schlacht - 15			S. R. Schlacht - 17
1	76.	Qany employment contracts other	1	88.	Q. Okay. And you say planning the
2		than that very first one	2		convention. That was the Portugal
3		A. Other than the first one, yes.	3		A. That was the Portugal.
4	77.	Qwith Banners Broker Limited.	4	89.	Qconvention in July of 2012?
5		Okay.	5		A. Yes, that's correct.
6		A. I know when I became Rai's	6	90.	Q. Okay. And the first point though
7		assistant, there was someI didn't sign anything	7		you mentioned that you were trained by the client to
8		though. We just went over what the duty changes but	8		understand how the program worked. Can you just
9		nothing was signed.	9		describe in a little more detail? First of all, who
10	78.	Q. Okay. Okay.	10		was the client that you're referring to?
11		A. Or not to my knowledge. I can't be	11		A. Bannersit would have been Banners
12		certain.	12		Broker International.
13	79.	Q. All right. So, I think what I would	13	91.	Q. So, is there a distinction in your
14	-	like to cover now is just what your responsibilities	14		mind then between Banners Broker Limited, who was
15		were throughout	15		your employer, and Banners Broker International, who
16		A. Sure.	16		was the client?
17	80.	Qthe period that you worked at	17		A. Yes.
18	501	Banners. And, so let's deal withwe'll start at	18	92.	Q. And what is thatwhy do you
19		the beginning. May, 2012.	19		believe that one was your employer and the other was
20		A. M'hmm.	20		the client?
21	81.	Q. You were at Joey's and Kuldip Josun	21		A. Because I worked for Rajiv Dixit and
22	U1.	hires you to be his personal assistant?	22		Chris Smith was the sole owner of Banners Broker
22		A. M'hmm.	23		International.
120			23	93.	
21	<u>0</u> 0	() And you wore with him counde like			
24 25	82.	Q. And you were with him, sounds like, up until about July of 2012?	25		Q. Okay. Did you have an understanding as to whether Banners Broker International Limited

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		t 6 Page 18		Page 20
	51166	S. R. Schlacht - 18	-	S. R. Schlacht - 20
1		was a Canadian company or a foreign company?	1 2	109. Q. So you believe that Rajiv Dixit was the sole owner of Banners Broker Limited?
2	0.4	A. Can you repeat the question, sorry?		A. I didn't know who the sole owner
3	94.	Q. Did youwhen you speak of Mr.	4	was. All I'm saying is that I know that where my
45		Smith's company, Banners Broker International		navehock came from and who I reported to
		Limited, did you have an understanding as to	5	paycheck came from and who I reported to.
6		where A. No.		110. Q. Okay. A. So, at that time I was new to the
8	05			company. I didn't know.
9	95.	Qthat company was situated? A. I wasn't privy to that information.		111. Q. Okay. So, again, we're still
10	96.		10	talking about the Josun period
11	50.	Q. Okay. Banners Broker Limited, whose company did you understand that to be?	111	A. Yes.
12		A. Banners Broker Limited was Rajiv	12	112. Qat Banners Broker Limited.
13		Dixit.	13	A. Sure.
14	97.	Q. Okay. Rajiv Dixit as owner?	14	113. Q. And in terms of your duties, your
15	07.	A. I'm not sure at that time.	15	responsibilities.
16	98.	Q. Okay.	16	A. M'hmm.
17	00.	A. I didn't see any corporate	17	114. Q. You've mentioned that you were,
18		documents.	18	first of all involved in being trained by the client
19	99.	Q. But did you understand him to be an	19	to undertaketo understand how the program worked?
20	001	owner?	20	A. M'hmm.
21		A. I understood him to be my boss.	21	115. Q. Okay. So, we've establishedI
22	100.		22	think the client was Banners Broker International
23		thethis was a period of time that you were	23	Limited?
24		working with Josun?	24	A. M'hmm.
25		A. Yes.	25	116. Q. And what was the nature of the
E	Page	19	J	
	age		·	Page 21
	uge	S. R. Schlacht - 19		S. R. Schlacht - 21
1	101.	S. R. Schlacht - 19 Q. Presumably, at Banners Broker	1	S. R. Schlacht - 21 training that you received in respect of the
1		S. R. Schlacht - 19 Q. Presumably, at Banners Broker Limited. So, in terms of the reporting structure,	1	S. R. Schlacht - 21 training that you received in respect of the program, and whatI guess I should say, first of
3		S. R. Schlacht - 19 Q. Presumably, at Banners Broker Limited. So, in terms of the reporting structure, was it	1 2 3	S. R. Schlacht - 21 training that you received in respect of the program, and whatI guess I should say, first of all, what was the program that you're referring to?
3 4	101.	S. R. Schlacht - 19 Q. Presumably, at Banners Broker Limited. So, in terms of the reporting structure, was it A. I only reported to Kul.	1 2 3 4	S. R. Schlacht - 21 training that you received in respect of the program, and whatI guess I should say, first of all, what was the program that you're referring to? A. I'm referring to Banners Broker
3 4 5		S. R. Schlacht - 19 Q. Presumably, at Banners Broker Limited. So, in terms of the reporting structure, was it A. I only reported to Kul. Q. To Kul?	1 2 3 4 5	S. R. Schlacht - 21 training that you received in respect of the program, and whatI guess I should say, first of all, what was the program that you're referring to? A. I'm referring to Banners Broker International. So, how the companyhow Banners
3 4 5 6	101. 102.	S. R. Schlacht - 19 Q. Presumably, at Banners Broker Limited. So, in terms of the reporting structure, was it A. I only reported to Kul. Q. To Kul? A. Yes.	1 2 3 4	S. R. Schlacht - 21 training that you received in respect of the program, and whatI guess I should say, first of all, what was the program that you're referring to? A. I'm referring to Banners Broker International. So, how the companyhow Banners Broker works. So, I got trained on the back office,
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	Sheet 7 Page 22S. R. Schlacht - 22		Page 24 S. R. Schlacht - 24
1	service," what aspect of the business are you	1	133. Q. Or even a general answer, I guess,
2	referring to? By that I mean, are you dealing with	23	in terms of like if I wanted to be an affiliate in
3	affiliates, dealing with independent contractors?		summer of 2012I wanted to become an affiliate,
4	A. Are you asking about customer	4	whatcan you describe me for what I would be
5	service in general?	5	getting myself into?
6	122. Q. Yes, what did customer service mean	6	A. There was different steps that you
7	to you at the time?	8	had to go through, but like I said, I haven't dealt
8 9	A. Customer service meant dealing with affiliates.	9	that with that in over two years, so I wouldn't feel comfortable explaining in detail.
10	123. Q. With affiliates, okay. And you were	10	134. Q. Okay.
11	trained in how the business model worked? The		A. Right now.
12	Banners Broker business model?	12	135. Q. And again, I'm not going to hold you
13	A. Can you refer to what you mean by	13	to it. But, I would
14	"business model"?	14	A. But you know what I mean. Like,
15	124. Q. Did you know what was being sold?	15	it's a complicated procedure. If you were to ask me
16	Did Tara Josun, or somebody else, explain the	16	questions, I could answer them, but I can'tI
17	A. The product, yes.	17	don't feel comfortable explaining it, because I
18	125. Qproduct. Okay.	18	136. Q. Sure, okay, well let me
19	A. Yes.	19	A. You know what I mean?
20 21	126. Q. And what was your understanding at	20	137. Qwell we can approach it this way?
22	the time as to the product that was being sold? A. It wasthis was two years ago, so	22	Like if I in July 2012 am told about Banners Broker and want to join as an affiliate. What would be the
23	I can'tI haven't been involved in two years.	22	first step that I would have to take to become an
24	Banners, and online.	24	affiliate?
25	127. Q. Okay. But, like I'm told that there	25	A. I couldn'tlet me think back.
	Page 23		Page 25
	S. R. Schlacht - 23		S. R. Schlacht - 25
1	was an earning structure involved in their business	1	It's an affiliate program, so someone has to refer
2	model so that affiliates could, through their own	2	it to you, and then you have to go through the
3	computers, purchase banners and purchase packages	3	system of buying a package.
4 5	to A. Yes.	45	138. Q. Okay. Andso, that would be the
6	128. Qgenerate traffic across	11 *	first step?
7			A Leguldn't be cortain in saving
	Δ I was trained on that		A. I couldn't be certain in saying
8	A. I was trained on that.	7	that.
8 9	129. Qthe banners. You were trained in	7 8	that. 139. Q. Okay. And how would I purchase a
9 10		7	that. 139. Q. Okay. And how would I purchase a package and what sort of package would I be
9 10 11	 129. Qthe banners. You were trained in all of that? A. Yes. 130. Q. And did you have an understanding as 	7 8 9 10 11	that. 139. Q. Okay. And how would I purchase a package and what sort of package would I be purchasing? A. You would go online to purchase it,
9 10 11 12	 129. Qthe banners. You were trained in all of that? A. Yes. 130. Q. And did you have an understanding as to how it worked? 	7 8 9 10 11 12	that. 139. Q. Okay. And how would I purchase a package and what sort of package would I be purchasing? A. You would go online to purchase it, and then it would take you step by step. I couldn't
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9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 129. Qthe banners. You were trained in all of that? A. Yes. 130. Q. And did you have an understanding as to how it worked? A. Yes. 131. Q. Okay, and can youand there were different coloured banners as well? A. To my knowledge, from two years ago, yes. 132. Q. Okay. And what else, sitting here today can you tell me about the business model as you understand itwhen you start, sorry, just let 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 that. 139. Q. Okay. And how would I purchase a package and what sort of package would I be purchasing? A. You would go online to purchase it, and then it would take you step by step. I couldn't be certain in telling you those exact steps. As I said, it was a few years ago. 140. Q. Okay. But, I take it you knew at the time A. Oh, at the time 141. Qexactly? Ayes. 142. Q. So, at the time, in July 2012, if I
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			S. R. Schlacht - 26			1	S. R. Schlacht - 28	5
1		yes.		1		come to the	convention?	
2	144	. Q.	Okay, so you knewis it fair to	2		A. /	Affiliates.	
3			ew in detail in July of 2000 and	3	158		The affiliates, okay. And, I take	
		δάγ, you κι	Oh in July, no. I wasn't trained	4		it that the co	privention took place and some	
			Offini July, no. Twasht traineu				nivention took place and some	
5	–	yet, sorry.		5		affiliates atte		
6	145	. Q.	Ah	6			M'hmm.	
7		А.	I had a basic knowledge of how	7	159	. Q.	Do you recall approximately how many	
8		things work		8			Are we talking hundreds, thousands,	
9	146	. Q.		9		dozens?	Are the tailing handload, the dealined,	
	140						Loculdate ha portain. Lurould pour	
10			l didn't goI didn't do a formal	10		A. I	l couldn't be certain. I would say	
11		training unt	il August.	11		about a thou	usand, more, or maybe more.	
12	147	. Q.	Okay. So, in August once you were	12	160	. Q.	Okay. And from a planning	
13			ined, is it fair to say that you at that	13			how were you involved in planning that	
14		noint would	have had a detailed understanding of how	14		conference i		
15		the	have had a detailed understanding of now	1 15			lann onugar: Leanna in in Mau, ea, a faw mantha	
15		the	A 11 1 1	15		, A. I	came in in May, so, a few months	
16		А.	A good knowledge.	16		before. Lara	a Josun was leading that and I just did	
17	148	. Q.	Banners program worked?	17		any ground v	work that she needed. So, the running	
18		A.	A good knowledge.	118		around any	/thina.	
19	149.		Okay. And if I had any questions	19			So, as between yourself and Tara	
20	110		was involved in being an affiliate, you	20			Tara Josun leading the planning?	
20		about what	was involved in being an anniale, you					
21			be able to answer those questions for	21			That was my knowledge.	
22		me?		22	162		Okay.	
23		A.	Or had them answered, yes.	23		A. Y	Yes, that's what	
24	150.		Was there any otheryou mentioned	24	163		Andbut you assisted her by doing	
25		as well in th	e list of duties that you were trained	25		ground work		
			c list of dulies lindt you were trained					
	Page				. Page]
	Page	27	S. R. Schlacht - 27		. Page	29	S. R. Schlacht - 29	
1	Page	on the Banr	S. R. Schlacht - 27 hers Broker terminology. Is that		. Page	29		
1	Page	on the Banr	S. R. Schlacht - 27 hers Broker terminology. Is that			29 A. Y	S. R. Schlacht - 29 (es. And what types of things did you do	
1 2	Page	on the Banr terminology	S. R. Schlacht - 27 Thers Broker terminology. Is that just having to do with the affiliate	1 2	. Page 164,	29 A. Y	S. R. Schlacht - 29 (es. And what types of things did you do	
1 2 3	Page	on the Banr terminology program, or	S. R. Schlacht - 27 ers Broker terminology. Is that just having to do with the affiliate was there something in addition to that?	1 2 3		A. Y A. Y . Q. in terms of co	S. R. Schlacht - 29 Yes. And what types of things did you do onvention planning?	
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1 2 3	Page 15 1.	on the Banr terminology program, or A. Q.	S. R. Schlacht - 27 ers Broker terminology. Is that just having to do with the affiliate was there something in addition to that? Just the affiliate program. Okay.	1 2 3 4 5		A. Y Q. in terms of co A. J making sure	S. R. Schlacht - 29 And what types of things did you do onvention planning? lust double checking with the hotel, the right amount of rooms were done.	
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 151. 152. 153. 154. 155. 155. 156. 157. 	on the Banr terminology program, or A. Q. A. Q. A. Q. in terms of t that you car A. Q. convention J would, what being plann A. Q. A. Banners Bro Q. your client, r A. Q.	S. R. Schlacht - 27 bers Broker terminology. Is that just having to do with the affiliate was there something in addition to that? Just the affiliate program. Okay. So, packages, colours. All right. Product. And then in terms ofanything more he training that you received initially recall for me? No. No, okay. So, then moving on to the blanning. Describe for me please, if you first of all, what convention was ed and why. Sorry, that first Yes, please go ahead, yes. t was in Portugal, and it was for sker International. And Banners Broker International was ight? (es.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	164. 165. 166.	A. Y Q. in terms of co A. J making sure Going back a the last minu large event. Q. responsibilitie A. M Q. convention a you could un there any oth had with Mr. A. I time, no. Q. but just as a practice peop duties. Were Banners Brol	S. R. Schlacht - 29 Yes. And what types of things did you do onvention planning? Just double checking with the hotel, the right amount of rooms were done. and forth with the hotel manager. Just ite plannings you would do before a Okay. In terms of your initial es during the Kuldip Josun period. A'hmm. Apart from planning for the und being trained by the client so that iderstand how the program worked, was her duties or responsibilities that you Josun? was hired toduties at that Okay. And I use the term "duties," practical matteryou know, in ble do things that may go beyond their e there functions that you had at ker Limited in practice that were not duties? Things that you would do for	

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1 2 3 4 5 6 7 8 9 10 11 2 13 14 15 16 17 18 19 20 21 22 34 5	 Sheet 9 Page 30 A. Other than pick up his dry cleaning, no. 168. Q. Mr. Josun we're talking about? A. Yes. 169. Q. Okay. A. Or run errands for him. 170. Q. Okay, so there was some errands that you would run for Mr. Josun, and were theysounds like they were of a personal nature? A. They were personal, yes. 171. Q. Were they business related? A. Dry cleaning? No, personal. 172. Q. Okay. So, they were all personal? A. Mostly, yes. 173. Q. Were there any that were not personal? A. In regards to? 174. Q. Just errands that you would do for Mr. Josun? A. No. 175. Q. Okay. All right, so, I think that takes us to July 2012 when I understand that there was a falling out as between Mr. Josun and the other principals of Banners Broker. Are you aware that he 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 Page 32 S. R. Schlacht - 32 A. Independent contractor is someone who, I guess, would run that specific country. It's different from a reseller. It started off as resellers 181. Q. Right. Aand independent contractors when they had their own supportcustomer service. And then they made a certain commission off of any sales they brought in from their country. 182. Q. Okay. So, when you were trained initially, were you trained on the concept of independent contractors as well as affiliates? A. The concept of it, but I wasn'tthe first time I met the resellers and independent contractors was in Portugal. 183. Q. Okay. And so, you were at the meeting thenyou've told me that Kuldip Josun had with the independent contractors. And you took notes. Was he selling a different product from Banners Broker at the meeting? A. I don't know what his purpose was behind that, but it was a differentsome sort of different program. 184. Q. Okay. And do you know what that
25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 had a falling out at the convention in Portugal? Page 31 S. R. Schlacht - 31 A. Yes. 176. Q. Okay. And justI appreciate it this takes you back a ways, but can you describe for me what your personal knowledge, if any, in terms of how that falling out occurred? Because again, I'm asking this because it was quite public A. Yes 177. Qor some aspects of it were? A. He was trying toI don't know the details, but he was trying toI wouldn't be certain saying the details, but my understanding was he was trying to take the affiliates, or the independent contractors and pitch them another program. 178. Q. Okay. A. That was my understanding of it. 179. Q. Did you see him doing that? A. Did Ihe didhe called a meeting with the independent contractors, just them, himself and then I was there to take notes. 180. Q. Okay. And who are the independent contractors, because we haven't spent any time on that term. We've talked about affiliates, but who, or what is an independent contractor in terms of Banners Broker terminology? 	25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 33 S. R. Schlacht - 33 A. I wouldn't be able to tell you anything, sorry. 185. Q. Okay. Not even the name of it? A. No. 186. Q. Okay. And so, what happened next in terms of Mr. Josun's departure from Banners Broker at that time? A. I wasn't in anyall I know is that he was no longer involved. 187. Q. Okay. And how do you know that? A. Because it was quite public and everyone 188. Q. What was the public aspect of it? Like was there A. Just because he was making a big scene about it. 189. Q. Okay. A. And making threats. 190. Q. "He" being Mr. Josun? A. Mr. Josun, yes. 191. Q. Okay, and what were thetell me about the threats. Everything you can remember. Like I wasn't there A. Yes. 192. QI heard there was a scene in the

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	Sheet 10 Dage 24	Page 36
	Sheet 10 Page 34 S. R. Schlacht - 34	S. R. Schlacht - 36
1	lobby and there was security involved.	1 207. Q. All right. So, moving forward then
2	A. I wasn'tI was busy working. I	2 again to Portugal.
3	wasn't there for any of at.	A. M'hmm.
4	193. Q. So, ɗid you see any of	4 208. Q. Colin Tuck had let you know at some 5 point that Mr. Josun washad been fired from
56	A. No. 194. Qdid you see a scene in the lobby,	5 point that Mr. Josun washad been fired from 6 Banners Broker. How was it that you came to work
7	or	7 for Mr. Dixit, at that point?
8	A. No.	8 A. I asked if I still had abecause
9	195. Qhigh levels of security and	9 my boss just got fired, or let go, or whatever you
10	people removing Mr. Josun and his family?	10 want to call it. A difference of opinion. So, I
11	A. No.	11 thought I was not going to have a job.
12	196. Q. Okay. I take it you heard about	12 209. Q. Right.
13	that after?	13 A. And Raj said that they would find a
14	A. M'hmm.	14 job for me, because they liked my work style and
15	197. Q. You need to say yes or no.	15 felt I was an asset. 16 210. Q. So, did you speak to Mr. Dixit in
16 17	A. Oh, sorry, yes I did. 198. Q. Okay. And then, who within the	16 210. Q. So, did you speak to Mr. Dixit in 7 Portugal about that?
18	Banners Broker group told you that Mr. Josun was no	18 A. There was briefly, but there was
19	longer with the company?	19 no
20	A. Thatwhat do you mean by the	20 211. Q. Okay.
21	"Banners Broker group"?	A I voiced my concern and asked if
22	199. Q. WellI meanI suppose after Mr.	22 I would be fired.
23	Josun left did somebody tell you that your boss has	23 212. Q. Right.
24	been fired?	24 A. And he said we'll talk about it.
25	A. Colin.	25 213. Q. Back in Toronto?
	Page 35 S. R. Schlacht - 35	S. R. Schlacht - 37
1	200. Q. Colin, and sorryColin's last	1 A. Back when we get home, yes.
2	name?	2 214. Q. Okay. And so, you had
3	A. I don'tI can't remember.	3 thatpresumably you came back, you had that
4	201. Q. Okay. Is Colin Canadian?	4 conversation with Mr. Dixit, and as a result of that
5	A. I believe so.	5 you were hired to Mr. Dixit's assistant?
6	202. Q. Tuckcould it be Colin Tuck?	6 A. Well I still currently work for
	A. That soundsyes, that sounds	7 Banners Broker Limited, so I don't believe I signed
8	right.	8 any new employee agreement, but I worked
9 10	203. Q. And did you work with Colin Tuck in Toronto, at all, at Banners Broker Limited?	9 215. Q. Okay. 10 A. I then became his assistant, so I
11	A. I'm not sure who Colin worked for.	11 don't know if that's the right terminology.
12		
		1112 216. Q. Lunderstand, no Lunderstand,
	I'm not sure, but when I worked out of the Church Street address, he was there.	12 216. Q. I understand, no I understand, 13 that's helpful. Now asso let'sI'm going to
13 14	Street address, he was there.	13 that's helpful. Now asso let'sI'm going to 14 come back to the same question I had in relation to
13 14 15	Street address, he was there. 204. Q. Okay. So, you had met him prior to Portugal?	13that's helpful. Now asso let'sI'm going to14come back to the same question I had in relation to15Mr. Josun, but with respect to Mr. Dixit, what was
13 14 15 16	Street address, he was there. 204. Q. Okay. So, you had met him prior to Portugal? A. Yes.	 that's helpful. Now asso let'sI'm going to come back to the same question I had in relation to Mr. Josun, but with respect to Mr. Dixit, what was the nature of your duties?
13 14 15 16 17	Street address, he was there. 204. Q. Okay. So, you had met him prior to Portugal? A. Yes. 205. Q. And I suppose I should have asked at	 that's helpful. Now asso let'sl'm going to come back to the same question I had in relation to Mr. Josun, but with respect to Mr. Dixit, what was the nature of your duties? A. My duties. When you're an executive
13 14 15 16 17 18	Street address, he was there. 204. Q. Okay. So, you had met him prior to Portugal? A. Yes. 205. Q. And I suppose I should have asked at the outset, between May of 2012 and July of 2012,	 that's helpful. Now asso let'sl'm going to come back to the same question I had in relation to Mr. Josun, but with respect to Mr. Dixit, what was the nature of your duties? A. My duties. When you're an executive assistant you kind ofanythingbut my main
13 14 15 16 17 18 19	Street address, he was there. 204. Q. Okay. So, you had met him prior to Portugal? A. Yes. 205. Q. And I suppose I should have asked at the outset, between May of 2012 and July of 2012, when you were working for Mr. Josun, where,	 that's helpful. Now asso let'sl'm going to come back to the same question I had in relation to Mr. Josun, but with respect to Mr. Dixit, what was the nature of your duties? A. My duties. When you're an executive assistant you kind ofanythingbut my main duties wereI dealt directly with independent
13 14 15 16 17 18 19 20	Street address, he was there. 204. Q. Okay. So, you had met him prior to Portugal? A. Yes. 205. Q. And I suppose I should have asked at the outset, between May of 2012 and July of 2012, when you were working for Mr. Josun, where, physically, was your office? Where did you come to	 that's helpful. Now asso let'sl'm going to come back to the same question I had in relation to Mr. Josun, but with respect to Mr. Dixit, what was the nature of your duties? A. My duties. When you're an executive assistant you kind ofanythingbut my main duties wereI dealt directly with independent contractors. That was one main facet.
13 14 15 16 17 18 19 20 21	 Street address, he was there. 204. Q. Okay. So, you had met him prior to Portugal? A. Yes. 205. Q. And I suppose I should have asked at the outset, between May of 2012 and July of 2012, when you were working for Mr. Josun, where, physically, was your office? Where did you come to work? 	 that's helpful. Now asso let'sl'm going to come back to the same question I had in relation to Mr. Josun, but with respect to Mr. Dixit, what was the nature of your duties? A. My duties. When you're an executive assistant you kind ofanythingbut my main duties wereI dealt directly with independent contractors. That was one main facet.
13 14 15 16 17 18 19 20 21	Street address, he was there. 204. Q. Okay. So, you had met him prior to Portugal? A. Yes. 205. Q. And I suppose I should have asked at the outset, between May of 2012 and July of 2012, when you were working for Mr. Josun, where, physically, was your office? Where did you come to work? A. I went to Church Street, but I	 13 that's helpful. Now asso let'sl'm going to 14 come back to the same question I had in relation to 15 Mr. Josun, but with respect to Mr. Dixit, what was 16 the nature of your duties? 17 A. My duties. When you're an executive 18 assistant you kind ofanythingbut my main 19 duties wereI dealt directly with independent 20 contractors. That was one main facet. 21 217. Q. Okay. 22 A. Because they were in the process of
13 14 15 16 17 18 19 20	 Street address, he was there. 204. Q. Okay. So, you had met him prior to Portugal? A. Yes. 205. Q. And I suppose I should have asked at the outset, between May of 2012 and July of 2012, when you were working for Mr. Josun, where, physically, was your office? Where did you come to work? 	 that's helpful. Now asso let'sl'm going to come back to the same question I had in relation to Mr. Josun, but with respect to Mr. Dixit, what was the nature of your duties? A. My duties. When you're an executive assistant you kind ofanythingbut my main duties wereI dealt directly with independent contractors. That was one main facet.

	Shee	t 11 Page 38		Page 4	0
	Direc	S. R. Schlacht - 38		1090 1	S. R. Schlacht - 40
1		customer service for Banners Broker International, I	1	Р	repped the meetings. Personal errands. And also
2					lannedwas involved with the planning of
		trained them, basically, on how Stellar Point was			
3		operating with their customer service. And the	3		onventions in the future. Those were my main
4 5 6 7		training was provided by Banners Broker	4	-	uties.
5		International.	5	230.	Q. Okay. Convention planning.
6	219	. Q. Okay, so let me just take a note and	6	A	nything else that you can think of in terms
7		make sure I've got that right. You trained	7	0	fthe nature of the work that you did for Mr.
		independent contractors on what?	8	_	ixit?
8		A. Customer service for the affiliates.	9	D	A. No, that's the main.
10			10	231.	,
110	000	So, the affiliates from their counties			Q. Okay. Now did your salary change
11	220				uringwhen you movedfirst of all, while you
12		Awould call into their customer	12		ere working for Mr. Josun, and I appreciate it was
13		service.	13	ju	ist a few months
14	221		14		A. M'hmm.
15		service for the affiliates and their countries had	15	232.	Qbut did your salary change at all
16		been provided by Stellar Point?	16		terms of what you were paid?
17		A. Yes.	17		A. During that brief time?
18	222		18	233.	Q. Yes.
19	<u> </u>	Limited by way of name change. Is that your	19	200.	A. No.
20			20	234.	
20		understanding?			Q. Okay, and when you startedwhen
21	000	A. That's my understanding, yes.	21	yc	ou moved and you began working for Mr. Dixit, did
22	223		22	yc	our salary changed at that point?
23		the independent contractors as we discussed?	23		A. It changed, but not at that point.
24		A. That's correct.	24	235.	Q. Okay. At what point
25	224	Q. Did you deal with them on anything	25		A. But I don't believe so.
	Page	39	л — П	Page 41	L
	Page	39 S. R. Schlacht - 39		Page 41	S. R. Schlacht - 41
1	Page		1		S. R. Schlacht - 41
1 2	Page	S. R. Schlacht - 39 else?	1	236.	S. R. Schlacht - 41 Q. Okay. So, at what point did it
1 2 3	9	else? A. Commissions.	1 2	236.	S. R. Schlacht - 41 Q. Okay. So, at what point did it nange?
3	Page 225.	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else?	1 2 3	236. ch	S. R. Schlacht - 41 Q. Okay. So, at what point did it hange? A. I couldn't be specific with a time
3	9	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices,	1 2 3 4	236. ch	S. R. Schlacht - 41 Q. Okay. So, at what point did it hange? A. I couldn't be specific with a time hange, like with a month.
345	9	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had	1 2 3 4 5	236. ch	S. R. Schlacht - 41 Q. Okay. So, at what point did it nange? A. I couldn't be specific with a time nange, like with a month. Q. Right.
3	9	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had any questions, I would take them and then I would	1 2 3 4 5 6	236. ch 237.	S. R. Schlacht - 41 Q. Okay. So, at what point did it nange? A. I couldn't be specific with a time nange, like with a month. Q. Right. A. But maybe four months later, three
3 4 5 6 7	225.	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had any questions, I would take them and then I would direct them at the appropriate person.	1 2 3 4 5 6 7	236. ch 237.	S. R. Schlacht - 41 Q. Okay. So, at what point did it ange? A. I couldn't be specific with a time ange, like with a month. Q. Right. A. But maybe four months later, three onths. Sorry, it's been a while.
3 4 5 6 7 8	9	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had any questions, I would take them and then I would direct them at the appropriate person. Q. Okay. So, you were theis it fair	1 2 3 4 5 6 7 8	236. ch 237.	S. R. Schlacht - 41 Q. Okay. So, at what point did it hange? A. I couldn't be specific with a time hange, like with a month. Q. Right. A. But maybe four months later, three onths. Sorry, it's been a while. Q. No, I understand. And I'm not going
3 4 5 6 7 8 9	225.	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had any questions, I would take them and then I would direct them at the appropriate person. Q. Okay. So, you were theis it fair to say that you were the point person at Stellar	1 2 3 4 5 6 7 8 9	236. ch 237.	S. R. Schlacht - 41 Q. Okay. So, at what point did it nange? A. I couldn't be specific with a time nange, like with a month. Q. Right. A. But maybe four months later, three onths. Sorry, it's been a while. Q. No, I understand. And I'm not going hold you to dates, but
3 4 5 6 7 8 9 10	225.	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had any questions, I would take them and then I would direct them at the appropriate person. Q. Okay. So, you were theis it fair to say that you were the point person at Stellar Point for the independent contractors during this	1 2 3 4 5 6 7 8 9 10	236. ch 237. 238. to	S. R. Schlacht - 41 Q. Okay. So, at what point did it nange? A. I couldn't be specific with a time nange, like with a month. Q. Right. A. But maybe four months later, three onths. Sorry, it's been a while. Q. No, I understand. And I'm not going hold you to dates, but A. Yes.
3 4 5 6 7 8 9 10 11	225.	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had any questions, I would take them and then I would direct them at the appropriate person. Q. Okay. So, you were theis it fair to say that you were the point person at Stellar Point for the independent contractors during this period?	1 2 3 4 5 6 7 8 9 10 11	236. ch 237. 238. to 239.	S. R. Schlacht - 41 Q. Okay. So, at what point did it nange? A. I couldn't be specific with a time nange, like with a month. Q. Right. A. But maybe four months later, three onths. Sorry, it's been a while. Q. No, I understand. And I'm not going hold you to dates, but A. Yes. Qso perhaps three or four months
3 4 5 6 7 8 9 10 11 12	225. 226.	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had any questions, I would take them and then I would direct them at the appropriate person. Q. Okay. So, you were theis it fair to say that you were the point person at Stellar Point for the independent contractors during this period? A. That's correct.	1 2 3 4 5 6 7 8 9 10 11 12	236. ch 237. 238. to 239.	S. R. Schlacht - 41 Q. Okay. So, at what point did it nange? A. I couldn't be specific with a time nange, like with a month. Q. Right. A. But maybe four months later, three onths. Sorry, it's been a while. Q. No, I understand. And I'm not going hold you to dates, but A. Yes.
3 4 5 6 7 8 9 10 11	225.	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had any questions, I would take them and then I would direct them at the appropriate person. Q. Okay. So, you were theis it fair to say that you were the point person at Stellar Point for the independent contractors during this period? A. That's correct.	1 2 3 4 5 6 7 8 9 10 11	236. ch 237. 238. to 239. aft	S. R. Schlacht - 41 Q. Okay. So, at what point did it nange? A. I couldn't be specific with a time nange, like with a month. Q. Right. A. But maybe four months later, three onths. Sorry, it's been a while. Q. No, I understand. And I'm not going hold you to dates, but A. Yes. Qso perhaps three or four months ter you were working with Mr. Dixit, your salary
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	225. 226. 227. 228. 229.	S. R. Schlacht - 39 else? A. Commissions. Q. Okay. Anything else? A. Setting up their offices, commissions. I was the go to person, so if they had any questions, I would take them and then I would direct them at the appropriate person. Q. Okay. So, you were theis it fair to say that you were the point person at Stellar Point for the independent contractors during this period? A. That's correct. Q. Okay. Anything else in terms of dealings with the independent contractors that you can recall? A. Those were the main things. Q. Okay. So, and some of thoseI may come back to you but A. That's fine. Q. Apart from dealings with the independent contractors, what else did you do during this period as Mr. Dixit's executive assistant?	1 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 14 15 16 17 8 9 20 21 22	236. ch 237. ch 237. do 238. to 239. aft ch 240. it c 240. Ma 241. do 242. do ter	S. R. Schlacht - 41 Q. Okay. So, at what point did it nange? A. I couldn't be specific with a time nange, like with a month. Q. Right. A. But maybe four months later, three onths. Sorry, it's been a while. Q. No, I understand. And I'm not going hold you to dates, but A. Yes. Qso perhaps three or four months ter you were working with Mr. Dixit, your salary anged? A. I can't be specific with dates, but did change, yes. Q. Okay, and how did it change? A. It went up. I couldn't be exact. aybe to 55. No, 50. Q. Okay. A. I could check my bank records, but I n't know off hand. Q. All right. Now you've mentioned in

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	Sheet 12 Page 42	Page 44
	S. R. Schlacht - 42	S. R. Schlacht - 44
1	243. Q. That you had something to do with	1 256. Q. Okay, let's say United Kingdom?
2	commissions?	2 A. Okay.
3	A. M'hmm.	3 257. Q. Okay. And he sends you something,
4	244. Q. Can you just describe for me what it	4 presumably
5	was that you had to with commissions?	5 A. No, he doesn't send me.
6	A. So, basically what I did issorry,	6 258. Q. No?
7	I have to think back. Each country that had an	
8	independent contractor the color that name in I	
	independent contractor, the sales that came in, I	
9	was given a spreadsheet with the sales, and then I	9 259. Q. Okay. And what information would
10	calculated the commission. And the commissions	10 you get from Chris in respect of sales for thein
11	would go anywhere fromI don't remember if it was	11 this example, sales from the United Kingdom?
12	one percent to 10 percent, but the max was 10	A. It would be sales, if there was any
13	percent, based on that countries sales.	13 charge, like if that country had any affiliates that
14	245. Q. Okay. Commissions of one percent	14 charged back money.
15	toso, you did that calculationhow did you do	15 260. Q. Okay.
16	that calculation?	16 A. And that was it.
17	A. With the sales?	17 261. Q. But the sales, can we agree that
18	246. Q. Of the commission	18 when we use the term "sales" we are just referring
19	A. They made a percentage of the sales.	19 to monies that come from affiliates net of
20	247. Q. Ríght. Š	20 chargebacks? Is that how you calculate a sale?
21	A. So, I would take the sales and I	21 A. A chargeback is when a customer asks
22	would figure out the percentage.	22 for their money back.
23	248. Q. But there was an accounting software	23 262. Q. Right. Right. So, what are "sales"
24	that would allow you to do that?	24 though when we use this term in the Banners Broker?
25	A. It was a basic calculation so I just	A. When they purchase their product.
L		
	Page 43	Page 45
		S. R. Schlacht - 45
1	S. R. Schlacht - 43	S. R. Schlacht - 45
1	S. R. Schlacht - 43 did it myself.	S. R. Schlacht - 45 1 263. Q. When they purchase their banners?
1 2	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator?	S. R. Schlacht - 45 1 263. Q. When they purchase their banners? 2 A. Yes.
1	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes.	S. R. Schlacht - 45 1 263. Q. When they purchase their banners? 2 A. Yes. 3 264. Q. Okay, so the IC for the UK would get
1 2 3 4	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can	S. R. Schlacht - 45 1 263. Q. When they purchase their banners? 2 A. Yes. 3 264. Q. Okay, so the IC for the UK would get 4 a commission on the total volume of sales in his
1 2 3 4 5	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can completely understand the commissions.	S. R. Schlacht - 45 1 263. Q. When they purchase their banners? 2 A. Yes. 3 264. Q. Okay, so the IC for the UK would get 4 a commission on the total volume of sales in his 5 country?
1 2 3 4 5 6	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can completely understand the commissions. A. M'hmm.	S. R. Schlacht - 45 263. Q. When they purchase their banners? A. Yes. 264. Q. Okay, so the IC for the UK would get 4 a commission on the total volume of sales in his 5 country? 6 A. That's correct.
1 2 3 4 5 6 7	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can completely understand the commissions. A. M'hmm. 251. Q. It went from onethe commissions	S. R. Schlacht - 45 1 263. Q. When they purchase their banners? 2 A. Yes. 3 264. Q. Okay, so the IC for the UK would get 4 a commission on the total volume of sales in his 5 country? 6 A. That's correct. 7 265. Q. Okay. And that
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1 2 3 4 5 6 7 8 9 10 11	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can completely understand the commissions. A. M'hmm. 251. Q. It went from onethe commissions would go from one percent to 10 percent? A. I can't remember what the starting was. 252. Q. Okay.	S. R. Schlacht - 45 263. Q. When they purchase their banners? A. Yes. 264. Q. Okay, so the IC for the UK would get a commission on the total volume of sales in his country? A. That's correct. 265. Q. Okay. And that A. Sorry, it was up to 10 percent, or I believe there was a maximum dollar amount. 266. Q. Okay. 11 A. So, if that country brought in a
1 2 3 4 5 6 7 8 9 10 11 12	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can completely understand the commissions. A. M'hmm. 251. Q. It went from onethe commissions would go from one percent to 10 percent? A. I can't remember what the starting was. 252. Q. Okay. A. But it went max of 10.	S. R. Schlacht - 45 263. Q. When they purchase their banners? A. Yes. 264. Q. Okay, so the IC for the UK would get a commission on the total volume of sales in his country? A. That's correct. 265. Q. Okay. And that A. Sorry, it was up to 10 percent, or I believe there was a maximum dollar amount. 266. Q. Okay. A. So, if that country brought in a significant amount, it tapped out. But I couldn't
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 12 3 4 5 6 7 8 9 20 11 12 3 14 5 6 7 8 9 20 11 12 3 14 5 16 7 8 9 20 11 12 12 11 11	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can completely understand the commissions. A. M'hmm. 251. Q. It went from onethe commissions would go from one percent to 10 percent? A. I can't remember what the starting was. 252. Q. Okay. A. But it went max of 10. 253. Q. There was a range up to a max of 10. And people were being paid on commission on what type of sales? A. The independent contractor was being paid from the sales from that country. 254. Q. Okay. And the sales from that country would consist of monies collected from affiliates that were resident within that country? A. Yes 255. Q. Like what were the salesmaybe	S. R. Schlacht - 45 263. Q. When they purchase their banners? A. Yes. 264. Q. Okay, so the IC for the UK would get a commission on the total volume of sales in his country? A. That's correct. 265. Q. Okay. And that 8 A. Sorry, it was up to 10 percent, or I 9 believe there was a maximum dollar amount. 10 266. Q. Okay. 11 A. So, if that country brought in a 12 significant amount, it tapped out. But I couldn't 13 give you the exact. 14 267. Q. All right. And so, youChris would give you information on sales for a given IC? 15 would give you information on sales for a given IC? 16 A. That's correct. 17 268. Q. Right. Do you know where he got 18 that information from? 19 A. No. 20 269. Q. Okay. And then you would take that 269. A. M'hmm.
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 12 3 4 5 6 7 8 9 20 11 12 3 14 5 6 7 8 9 10 11 12 3 14 5 6 7 8 9 10 11 12 13 14 5 16 7 10 10 10 10 10 10 10 10 10 10 10 10 10	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can completely understand the commissions. A. M'hmm. 251. Q. It went from onethe commissions would go from one percent to 10 percent? A. I can't remember what the starting was. 252. Q. Okay. A. But it went max of 10. 253. Q. There was a range up to a max of 10. And people were being paid on commission on what type of sales? A. The independent contractor was being paid from the sales from that country. 254. Q. Okay. And the sales from that country would consist of monies collected from affiliates that were resident within that country? A. Yes	S. R. Schlacht - 45 263. Q. When they purchase their banners? A. Yes. 264. Q. Okay, so the IC for the UK would get a commission on the total volume of sales in his country? A. That's correct. 265. Q. Okay. And that A. Sorry, it was up to 10 percent, or I believe there was a maximum dollar amount. 266. Q. Okay. A. So, if that country brought in a significant amount, it tapped out. But I couldn't give you the exact. 267. Q. All right. And so, youChris would give you information on sales for a given IC? A. That's correct. 268. Q. Right. Do you know where he got that information from? A. No. 269. Q. Okay. And then you would take that information and you would perform a calculation? A. M'hmm. 270. Q. And you would arrive at a commission
1 2 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 14 5 16 17 10 10 10 10 10 10 10 10 10 10 10 10 10	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can completely understand the commissions. A. M'hmm. 251. Q. It went from onethe commissions would go from one percent to 10 percent? A. I can't remember what the starting was. 252. Q. Okay. A. But it went max of 10. 253. Q. There was a range up to a max of 10. And people were being paid on commission on what type of sales? A. The independent contractor was being paid from the sales from that country. 254. Q. Okay. And the sales from that country would consist of monies collected from affiliates that were resident within that country? A. Yes 255. Q. Like what were the salesmaybe it's easier if we take an example. Like, an	S. R. Schlacht - 45 263. Q. When they purchase their banners? A. Yes. 264. Q. Okay, so the IC for the UK would get a commission on the total volume of sales in his country? A. That's correct. 265. Q. Okay. And that A. Sorry, it was up to 10 percent, or I believe there was a maximum dollar amount. 266. Q. Okay. 11 A. So, if that country brought in a significant amount, it tapped out. But I couldn't give you the exact. 267. Q. All right. And so, youChris would give you information on sales for a given IC? A. That's correct. 268. Q. Right. Do you know where he got that information from? A. No. 269. Q. Okay. And then you would take that information and you would perform a calculation? A. M'hmm. 23 270. Q. And you would arrive at a commission amount, and then what's the next step?
1 2 3 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 14 5 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	S. R. Schlacht - 43 did it myself. 249. Q. Through the calculator? A. Or in a spreadsheet, yes. 250. Q. Okay. And just so that I can completely understand the commissions. A. M'hmm. 251. Q. It went from onethe commissions would go from one percent to 10 percent? A. I can't remember what the starting was. 252. Q. Okay. A. But it went max of 10. 253. Q. There was a range up to a max of 10. And people were being paid on commission on what type of sales? A. The independent contractor was being paid from the sales from that country. 254. Q. Okay. And the sales from that country would consist of monies collected from affiliates that were resident within that country? A. Yes 255. Q. Like what were the salesmaybe	S. R. Schlacht - 45 263. Q. When they purchase their banners? A. Yes. 264. Q. Okay, so the IC for the UK would get a commission on the total volume of sales in his country? A. That's correct. 265. Q. Okay. And that A. Sorry, it was up to 10 percent, or I believe there was a maximum dollar amount. 266. Q. Okay. A. So, if that country brought in a significant amount, it tapped out. But I couldn't give you the exact. 267. Q. All right. And so, youChris would give you information on sales for a given IC? A. That's correct. 268. Q. Right. Do you know where he got that information from? A. No. 269. Q. Okay. And then you would take that information and you would perform a calculation? A. M'hmm. 270. Q. And you would arrive at a commission

1

Page	48						4
					S R	Schlacht	- 48
281.		Q.	Okay.	So, I take it in	some	cases	-
	you co	ould re	solve th	e commission (concer	ns directly	y?
	. 1	4. I	could re	esolve it based	on the	;	
	inform	ation I	was giv	/en.			
282.			Right.				
				numbers. If it w	ias a		
				ething they wer		uestion th	at
	went h	evonc	I my scr	pe of my know	ledae	then I wor	uld
	have t				lougo		uiu
202	HUVEL	° ∩	Okay	Now wo'vo bo	on talk	ing about	
۲۵۵.		Q.	Undy.	Now we've be	tii lain	ing about	

		S. R. Schlacht - 46			S. R. Schlacht - 48
	1	with a commission amount. And most of the time,	1	281	. Q. Okay. So, I take it in some cases
	2	when I say "Chris" I either corresponded with him	2		you could resolve the commission concerns directly?
	3	directly or his assistant Brea.	3		A. I could resolve it based on the
	4 27.		4		information I was given.
	5	A. Um	5	282	. Q. Right.
	6 272			LUL	A. So, the numbers. If it was a
	7 212	amount?			dispression of a comparison that
	0				discrepancy or something they were a question that
	8	A. At a commission. And then I would	8		went beyond my scope of my knowledge then I would
	9	email the independent contractor with this	9		have to
1		information.	10	283.	. Q. Okay. Now we've been talking about
1			11		commissions. Is that the same term as payouts?
1		amount or his sales and his commission amount?	12		A. No.
1	3	A. Both.	13	284.	Q. No. Okay. So, what werehow were
1			14		payouts different from commissions?
1		him the information at that point?	115		A. Well it depends if you're talking
1		A. Yes.	15		about commissions for affiliates or commissions for
1			17		independent contractors. Commissions for
1		next step in the process?	18		
1		A. I would let Chris know that			independent contractors are based on the affiliates
			19		in their country, and their sales. Commissions to
20)	everything had been sent out, and then Chris would	20	005	the affiliate areis money paid to them.
2		issue the wire directly. And then I would confirm.	21	285.	
22		Then Chris or Brea would confirm with me that the	22		A. Commissions.
23	3	wires were sent, and then I would confirm with the	23	286.	
24		independent contractor that wires were sent.	24		are they the same as payouts?
25	5 276	. Q. Okay. Were you involved in sending	25		A. I believe that's the same term.
	_ Page		,	Page	49
		S. R. Schlacht - 47][Page	
•			1	Page 287.	S. R. Schlacht - 49
2		S. R. Schlacht - 47	1		S. R. Schlacht - 49 Q. Okay.
		S. R. Schlacht - 47 A. No.	1	287.	S. R. Schlacht - 49 Q. Okay. A. It depends. Sorry, I'm confused.
2		S. R. Schlacht - 47 the wires? A. No. . Q. Were all the independent contractors	1 2 3	287. 288.	S. R. Schlacht - 49 Q. Okay. A. It depends. Sorry, I'm confused. Q. Okay. I think what I'll do is I'll
	277	S. R. Schlacht - 47 the wires? A. No. . Q. Were all the independent contractors paid by wire transfer, or do you know if there are	1 2 3	287. 288.	S. R. Schlacht - 49 Q. Okay. A. It depends. Sorry, I'm confused. Q. Okay. I think what I'll do is I'll come back to that. But I do understand everything
	277	S. R. Schlacht - 47 the wires? A. No. . Q. Were all the independent contractors paid by wire transfer, or do you know if there are other mechanisms of payment?	1 2 3	287. 288.	S. R. Schlacht - 49 Q. Okay. A. It depends. Sorry, I'm confused. Q. Okay. I think what I'll do is I'll come back to that. But I do understand everything you've told me about commission calculations in
	277	S. R. Schlacht - 47 the wires? A. No. Q. Were all the independent contractors paid by wire transfer, or do you know if there are other mechanisms of payment? A. Let me think. To my knowledge it	1	287. 288.	S. R. Schlacht - 49 Q. Okay. A. It depends. Sorry, I'm confused. Q. Okay. I think what I'll do is I'll come back to that. But I do understand everything you've told me about commission calculations in relation to independent contractors.
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45 67 89 10	277	S. R. Schlacht - 47 the wires? A. No. Q. Were all the independent contractors paid by wire transfer, or do you know if there are other mechanisms of payment? A. Let me think. To my knowledge it was wires. I couldn'tit was so long ago, I couldn'tI believe it was onlywhat I dealt with, it was only wires. Q. Okay. Now if an independent contractor had a question about the commission	1 2 3 4 5 6 7 8 9 10 11	287. 288. 289.	S. R. Schlacht - 49 Q. Okay. A. It depends. Sorry, I'm confused. Q. Okay. I think what I'll do is I'll come back to that. But I do understand everything you've told me about commission calculations in relation to independent contractors. A. Yes. Q. Okay, that makes sense. A. I didn't have anything to do with commission payouts for the affiliates. Can I take a juice?
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22 34 56 77 89 10 11 12 13 14 15 16 17 18 19 20 21 22	277 278. 279. 280.	S. R. Schlacht - 47 the wires? A. No. Q. Were all the independent contractors paid by wire transfer, or do you know if there are other mechanisms of payment? A. Let me think. To my knowledge it was wires. I couldn'tit was so long ago, I couldn'tI believe it was onlywhat I dealt with, it was only wires. Q. Okay. Now if an independent contractor had a question about the commission calculation that you sent them. A. M'hmm. Q. Would you field that question and see thatand make sure that it was resolved? Was that part of your duties? A. If they had a question, yes. Q. Okay. And so, to use my example of the independent contractor in the UK had a question about the sales figure or the commission calculation that you sent him, would youhow might you, or how would you resolve it?	1 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	287. 288. 289. 290. 291. 292.	S. R. Schlacht - 49 Q. Okay. A. It depends. Sorry, I'm confused. Q. Okay. I think what I'll do is I'll come back to that. But I do understand everything you've told me about commission calculations in relation to independent contractors. A. Yes. Q. Okay, that makes sense. A. I didn't have anything to do with commission payouts for the affiliates. Can I take a juice? Q. Yes, by all means, help yourself. If you need a break A. No, I'm fine. I'm fine. Q. Okay. And then, also, in terms of dealing with the independent contractors, or ICs. A. M'hmm. Q. What did you do in relation to helping them set up offices? A. Just made sure that they were trained on the customer service aspect. That was basically it. They were responsible for setting up

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Page Sheet 14 S. R. Schlacht - 52 S. R. Schlacht - 50 believe, unless there was an odd task, but them. Is that what it consisted of? 1 1 nothing...routine-wise, that was the main things. 2 3 4 5 2 3 Sometimes, or sometimes over Skype A. Okay. Now were there some odd tasks 306. Q. or email. that stand out in your mind that you can recall for 4 5 6 294. Q. Was there anyone else, apart from me now that you did in relation to the Banners yourself, that was involved in training...in 6 training the independent contractors on the customer Broker, for Mr. Dixit. 7 service aspect of their business? 7 In regards to Banners Broker A. 8 8 Limited? On the customer service aspect, that A. 9 9 307. was mainly myself. Q. In regards to Banners Broker. I 10 10 295. Okay. And so when you...we talked don't really draw a distinction between Banners Q. earlier about setting up offices, is that just the 11 Broker Limited. I can if you want, but I'm just 11 customer service aspect, or is that something more? 12 12 speaking anything to do with the Banners Broker 13 13 Just the customer service. business. A. 14 14 A. Okay, because there is... 296. Q. Okay. And then the next item I 15 15 Q. Were there any odd tasks or... 308. wanted to talk about was the convention planning. 16 16 ...a distinction. No. Most of Sure. A. A. 17 17 297. So, during the period of time that them, other than those, it was mostly just personal Q. 18 you were working with Mr. Dixit. So, this is after 18 things. 19 Portugal? 19 309. Q. Okay. 20 20 There was nothing else. A. M'hmm. Α. 21 21 298. Q. What were the conventions that you 310. Q. Okay. 22 can recall that you were involved in planning? 22 A. You could ask me and I could answer 23 Just let me think. There was 23 it. You know what I mean. A. 24 24 one...I believe the first one was Ireland. I 311. Q. Yes. 25 25 It's hard to think off-hand. couldn't give you an exact month. Sorry. A. Page 53 Page 51 S. R. Schlacht - 53 S. R. Schlacht - 51 No, I think that we should do that, 299. 312. 1 Q. Okay. 1 Q. 2 2 3 because I have some notes about things that I wanted And then I believe it was UK. Α. to take you through, and you can tell me if you had 3 300. Do you recall a city in the UK? Q. It was right outside... 4 any involvement... 4 A. 5 5 301. Q. Was it Manchester? A. Sure. 6 6 It was outside of Manchester, but I ...with them. First of all I take 313. Q, A. 7 7 guess it could be. it while you were working for Mr. Josun and then 8 8 302. subsequently for Mr. Dixit, this was a full time Q. Okay. 9 9 job? People it called it Manchester but A. it was a little bit ... a little town outside of it. 10 10 A. It was a full time job. Q. Okay. Who are the other ones? Q. And when you were working for Mr. 11 303. 11 314. Dixit, which office did you work out of? 12 The last one I did, which was right 12 13 A. I went to Oshawa and I think it was 13 before coming near the end of my employment was in 14 Niagara Falls. 1019 Nelson to start with. 14 15 15 315. Right. Okay and then after that did 304. And when we talk about convention Q. Q. it change to 5 Carlow Court? 16 16 planning, these are conventions of affiliates that 17 A. It changed intermittently between 17 the...conventions of the affiliates and the 18 18 1019. It was another consumers briefly, which was independent contractors would attend. like the one 19 19 just rented office space. in Portugal? 20 Similar, yes. 20 316. Right. Q. A. 21 Okay. All right. So, is there 21 A. And then it was 5 Carlow Court. 305. Q. 22 anything else that we haven't discussed that you 22 317. Q. And then another consumers, do you 23 mean Consumers road... 23 can..in terms of what you did for Mr. Dixit while 24 24 you were his executive assistant? Sorry, yes. A. 25 Q. 25 318. ...address. A. No, that covers most of it. 1

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	S. R. Schlacht - 54	S. R. Schlacht - 56
1	A. Sorry.	1 329. Q. But in your capacity as providing
2	319. Q. All right. Do you recall the	2 training on customer service to the independent
3	address?	3 contractors, would you explain to them how the back
4	A. Not off hand.	4 office worked?
5	320. Q. And would you work from home	5 A. Yes.
6	sometimes, as well during this period? Or would you	6 330. Q. And so, howI appreciate it may
7	come into the office every day?	7 have evolved over time, but how did it work, the
8	A. Sometimes, but mainly into the	8 payouts to affiliates, from a back office
9	office.	9 perspective?
10	321. Q. Okay. So, thislet's go	10 A. From a back office, I didn't have
11	throughI wanted to go through my list in terms of	11 access to any oflike I couldn't do anything in
12	acposts of the business, and you can tall me whether	
	aspects of the business, and you can tell me whether	
13	or not you had any contact with them or involvement?	
14	A. Sure.	14 country.
15	322. Q. And the first one I had was	15 331. Q. I see.
16	commission calculations, and I think we've talked	A. So, whatever one that they applied
17	about commission calculations in resect of	for or whatnot, that's how they would be paid. But
18	independent contractors?	18 I didn't have anything to do with payouts so I
19	A. That's correct.	19 wouldn't really be
20	323. Q. What about payouts to affiliates?	20 332. Q. So, from an administrative
21	A. I think you already asked that but	21 perspective you had nothing to do with payouts.
22	it was no.	22 From an independent contractor training perspective
23	324. Q. No?	23 you explained to them how the back office worked?
24	A. Yes.	A. Yes, that's correct.
25	325. Q. Soand by payouts to	25 333. Q. What about travel bookings. Were
L	Page 55	Page 57
	S. R. Schlacht - 55	S. R. Schlacht - 57
1	affiliateslet me ask this because I know I didn't	
2		
3	ask this What was the process in respect of payouts	1 you involved in making travel arrangements?
0	ask this. What was the process in respect of payouts	2 A. I was.
	to the affiliates? If I'm an affiliate and I have	A. I was. 3 334. Q. For people within the Banners
4	to the affiliates? If I'm an affiliate and I have money in my Banners Broker account, how do I	A. I was. 3 334. Q. For people within the Banners 4 Brokers group?
4 5	to the affiliates? If I'm an affiliate and I have money in my Banners Broker account, how do I withdraw that money? What was your understanding at	A. I was. 3 334. Q. For people within the Banners 4 Brokers group? 5 A. Yes.
4 5 6	to the affiliates? If I'm an affiliate and I have money in my Banners Broker account, how do I withdraw that money? What was your understanding at the time of the process?	2 A. I was. 3 334. Q. For people within the Banners 4 Brokers group? 5 A. Yes. 6 335. Q. And so, that would include Mr.
4 5 6 7	to the affiliates? If I'm an affiliate and I have money in my Banners Broker account, how do I withdraw that money? What was your understanding at the time of the process? A. There were several different	 A. I was. 334. Q. For people within the Banners Brokers group? A. Yes. 335. Q. And so, that would include Mr. Dixit, presumably when you were working for him?
4 5 6 7 8	to the affiliates? If I'm an affiliate and I have money in my Banners Broker account, how do I withdraw that money? What was your understanding at the time of the process? A. There were several different processes. I couldn't list them right now. But I	2 A. I was. 3 334. Q. For people within the Banners 4 Brokers group? 5 A. Yes. 5 A. Yes. 6 335. Q. And so, that would include Mr. 7 Dixit, presumably when you were working for him? 8 A. It included Mr. Dixit and a few
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4 5 6 7 8 9 10 11 22 13 14 15 16 17 18 19 20 12 22 23	 to the affiliates? If I'm an affiliate and I have money in my Banners Broker account, how do I withdraw that money? What was your understanding at the time of the process? A. There were several different processes. I couldn't list them right now. But I wasn't involved. I was mostly involved with independent contractors and the customer service side. But everything was laid out in the back office. There was 326. Q. Okay. APayza. There was a few. 327. Q. Now the back office, do you just use that as the term back office, or was there a physically a A. No, that's a term. So, everything was online for the affiliates. So, their back office refers to when they logged in to their Banners Broker account. Their back office, their eWallet. 328. Q. Right. 	 A. I was. 334. Q. For people within the Banners Brokers group? A. Yes. 335. Q. And so, that would include Mr. Dixit, presumably when you were working for him? A. It included Mr. Dixit and a few other people. 336. Q. Okay. Who were the other people that you would make travel arrangements for? A. Anyone that travelled I made a booking. 337. Q. Okay. A. So, I can't really recall the full list. 338. Q. Right, but it was everyone who travelled, that you would be responsible for booking? A. No. There was only periods of time where I did booking. There was other periods of time where it was someone else's responsibility. 339. Q. Okay. But it was always one person
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 to the affiliates? If I'm an affiliate and I have money in my Banners Broker account, how do I withdraw that money? What was your understanding at the time of the process? A. There were several different processes. I couldn't list them right now. But I wasn't involved. I was mostly involved with independent contractors and the customer service side. But everything was laid out in the back office. There was 326. Q. Okay. APayza. There was a few. 327. Q. Now the back office, do you just use that as the term back office, or was there a physically a A. No, that's a term. So, everything was online for the affiliates. So, their back office refers to when they logged in to their Banners Broker account. Their back office, their eWallet. 	 A. I was. 334. Q. For people within the Banners Brokers group? A. Yes. 335. Q. And so, that would include Mr. Dixit, presumably when you were working for him? A. It included Mr. Dixit and a few other people. 336. Q. Okay. Who were the other people that you would make travel arrangements for? A. Anyone that travelled I made a booking. 337. Q. Okay. A. So, I can't really recall the full list. 338. Q. Right, but it was everyone who travelled, that you would be responsible for booking? A. No. There was only periods of time where I did booking. There was other periods of time where it was someone else's responsibility.

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	Sheet 16 Page 58		Page 60
	S. R. Schlacht - 50	3	S. R. Schlacht - 60
1	would	1	or training who?
23	A. No.	2	A. Training of the back office, so
	340. Q. It was either yourself or who?	3	
4	A. There was a few other people. I	4	
5	couldn't	5	A. Affiliates were in the room.
4 5 6 7	341. Q. Brea Hardowa, was she one?		353. Q. Right.
8	A. I wouldn't be able to give you an answer to that.		A. But it wasn'tI wasn't training
9 9	342. Q. Okay. So, apart from yourself you	9	them, I was giving a lecture. 354. Q. Okay.
10	don't know the names of anyone else who did travel	10	A. Or, if you want to call it that.
11	bookings?	111	Just a brief 15-minutes.
12	A. I'm sorry I can't remember.	12	355. Q. Okay. And did you have a
13	343. Q. Okay. I have a note here in	13	PowerPoint?
14	relation to seminars.	14	A. Did I have a PowerPoint? I don't
15	A. Okay.	15	remember. Sorry.
16	344. Q. Are seminars the same as	16	356. Q. And what were you lecturing them on?
17	conventions?	17	Like, I know training, and you've used the term
18	A. No.	18	back office, but just tell me a little a bit more.
19	345. Q. So, what is the difference between a	19	A. I'm sorry, I can't remember.
20 21	seminar and a convention?	20	357. Q. Training themdo you recall if you
22	A. To my knowledge, it depends on the	21	were training them on payouts from their accounts? A. No. That was never anything I ever
23	language. Different terms. Right, but a seminardifferent affiliates could hold their own	23	 A. No. That was never anything I ever trained or discussed.
24	seminar. It just basically explains what the	23	358. Q. Did you
25	Banners Broker is and they're trying to get	25	A. Chris Smith was the only
	Page 59	\ 	Page 61
	S. R. Schlacht - 59		S. R. Schlacht - 61
1	affiliates to join their team.	1	responsible, to my knowledge, for payouts.
2 3	346. Q. And did you have any involvement in	23	359. Q. Did you traindo you recall if you
	either in setting up seminars?		trained them on purchasing packages of banners?
4			
5	A. No, that was affiliate.	4	A. No.
5	347. Q. Okay. Did you ever participate in	5	360. Q. You don't recall, or you recall that
6	347. Q. Okay. Did you ever participate in any seminars?	5 6 7	360. Q. You don't recall, or you recall that you didn't?
6 7	347. Q. Okay. Did you ever participate in any seminars? A. What do you mean by participate?	5 6 7	360. Q. You don't recall, or you recall that you didn't? A. When I was speaking in
6 7 8	 347. Q. Ókay. Did you ever participate in any seminars? A. What do you mean by participate? 348. Q. Like appear at a seminar, either in 	5 6 7 8	 360. Q. You don't recall, or you recall that you didn't? A. When I was speaking in 361. Q. In Ireland.
6 7 8 9	347. Q. Okay. Did you ever participate in any seminars? A. What do you mean by participate?	5 6 7 8 9	360. Q. You don't recall, or you recall that you didn't? A. When I was speaking in
6 7 9 10	 347. Q. Okay. Did you ever participate in any seminars? A. What do you mean by participate? 348. Q. Like appear at a seminar, either in person or online and present something? A. Inwhat convention was it? Ireland I believe. 	5 6 7 8 9 10	 360. Q. You don't recall, or you recall that you didn't? A. When I was speaking in 361. Q. In Ireland. Ain talking about, no. 362. Q. No. So, you don't recall or you recall that you didn't?
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6 7 8 9 0 1 2 3 4 5	 347. Q. Okay. Did you ever participate in any seminars? A. What do you mean by participate? 348. Q. Like appear at a seminar, either in person or online and present something? A. Inwhat convention was it? Ireland I believe. 349. Q. Yes? A. I spoke from a training perspective. 350. Q. Okay. And tell me about that. What wasjust describe it for me. Like, how many 	5 6 7 8 9 10 11 12 13 14 15	 360. Q. You don't recall, or you recall that you didn't? A. When I was speaking in 361. Q. In Ireland. Ain talking about, no. 362. Q. No. So, you don't recall or you recall that you didn't? A. Sorry, can you repeat the question? 363. Q. I just wantand I appreciate that you may not have any current recollection of it. But to the extent that we can, I would like to know
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678900 112345678920	 347. Q. Okay. Did you ever participate in any seminars? A. What do you mean by participate? 348. Q. Like appear at a seminar, either in person or online and present something? A. Inwhat convention was it? Ireland I believe. 349. Q. Yes? A. I spoke from a training perspective. 350. Q. Okay. And tell me about that. What wasjust describe it for me. Like, how many people were in the room, how long did you speak for, did you take questions? Just describe for me so I have a picture in my mind as to what happened in Ireland. A. Sorry, it was a long time ago. I 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 360. Q. You don't recall, or you recall that you didn't? A. When I was speaking in 361. Q. In Ireland. Ain talking about, no. 362. Q. No. So, you don't recall or you recall that you didn't? A. Sorry, can you repeat the question? 363. Q. I just wantand I appreciate that you may not have any current recollection of it. But to the extent that we can, I would like to know what it was that you lectured on in Ireland. And you've told me that you lectured on the back office? A. Can I have a minute to think? Sorry. 364. Q. Sure, yes, by all means. A. Because it was two years ago, my
67 8900 112 134 156 17 8900 112 12 12 12 12 12 12 12 12 12 12 12 12	 347. Q. Okay. Did you ever participate in any seminars? A. What do you mean by participate? 348. Q. Like appear at a seminar, either in person or online and present something? A. Inwhat convention was it? Ireland I believe. 349. Q. Yes? A. I spoke from a training perspective. 350. Q. Okay. And tell me about that. What wasjust describe it for me. Like, how many people were in the room, how long did you speak for, did you take questions? Just describe for me so I have a picture in my mind as to what happened in Ireland. A. Sorry, it was a long time ago. I think there was about 600 people, maybe. I didn't 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 360. Q. You don't recall, or you recall that you didn't? A. When I was speaking in 361. Q. In Ireland. Ain talking about, no. 362. Q. No. So, you don't recall or you recall that you didn't? A. Sorry, can you repeat the question? 363. Q. I just wantand I appreciate that you may not have any current recollection of it. But to the extent that we can, I would like to know what it was that you lectured on in Ireland. And you've told me that you lectured on the back office? A. Can I have a minute to think? Sorry. 364. Q. Sure, yes, by all means. A. Because it was two years ago, my mindit could havesee I can't give you a
67 89 101 112 112 114 15 16 17 18 19 21 22 22 22	 347. Q. Okay. Did you ever participate in any seminars? A. What do you mean by participate? 348. Q. Like appear at a seminar, either in person or online and present something? A. Inwhat convention was it? Ireland I believe. 349. Q. Yes? A. I spoke from a training perspective. 350. Q. Okay. And tell me about that. What wasjust describe it for me. Like, how many people were in the room, how long did you speak for, did you take questions? Just describe for me so I have a picture in my mind as to what happened in Ireland. A. Sorry, it was a long time ago. I think there was about 600 people, maybe. I didn't take any questions, and I don't remember what I 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 360. Q. You don't recall, or you recall that you didn't? A. When I was speaking in 361. Q. In Ireland. Ain talking about, no. 362. Q. No. So, you don't recall or you recall that you didn't? A. Sorry, can you repeat the question? 363. Q. I just wantand I appreciate that you may not have any current recollection of it. But to the extent that we can, I would like to know what it was that you lectured on in Ireland. And you've told me that you lectured on the back office? A. Can I have a minute to think? Sorry. 364. Q. Sure, yes, by all means. A. Because it was two years ago, my mindit could havesee I can't give you a definite answer. I don't remember. Panels maybe?
6 7 8	 347. Q. Okay. Did you ever participate in any seminars? A. What do you mean by participate? 348. Q. Like appear at a seminar, either in person or online and present something? A. Inwhat convention was it? Ireland I believe. 349. Q. Yes? A. I spoke from a training perspective. 350. Q. Okay. And tell me about that. What wasjust describe it for me. Like, how many people were in the room, how long did you speak for, did you take questions? Just describe for me so I have a picture in my mind as to what happened in Ireland. A. Sorry, it was a long time ago. I think there was about 600 people, maybe. I didn't 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 360. Q. You don't recall, or you recall that you didn't? A. When I was speaking in 361. Q. In Ireland. Ain talking about, no. 362. Q. No. So, you don't recall or you recall that you didn't? A. Sorry, can you repeat the question? 363. Q. I just wantand I appreciate that you may not have any current recollection of it. But to the extent that we can, I would like to know what it was that you lectured on in Ireland. And you've told me that you lectured on the back office? A. Can I have a minute to think? Sorry. 364. Q. Sure, yes, by all means. A. Because it was two years ago, my mindit could havesee I can't give you a definite answer. I don't remember. Panels maybe?

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	Shoot 17 Dage 62		Page 64
	Sheet 17 Page 62S. R. Schlacht - 62		S. R. Schlacht - 64
1	affiliates at the convention in Ireland?	1	A. I couldn't be certainit was so
2	A. No.	2	long ago.
3	366. MR. WARD: Why don't we just takeoff	3	374. Q. Did you ever see a training manual?
4	the record.	4	A. Yes.
5		5	375. Q. Okay, and is it a document that
6	A BRIEF RECESS	6	existed in physical form or was it an electronic
7		7	document?
8	STEPHANIE ROSE SCHLACHT, resumed	8	A. It was both.
9	CONTINUED EXAMINATION BY MR. WARD:	9	376. Q. Okay. And when you say that you
10	367. Q. So, before the break we were just		gave it to independent contractors. How did you get
12	going through a list of Banners Broker related	11	it to them?
13	functions and I was asking you whether or not you recall having any involvement in certain of these	12	A. When I went to gobecause most of the time we did visit that country, and I would give
14	items. Okay?	14	it to them physically.
15	A. M'hmm.	15	377. Q. I see. Okay. And you wereand
16	368. Q. And we talked about seminars. The	16	you mentioned that you were doing training for
17	next one that I had on my list was preparation of	17	independent contractors?
18	training manuals. Was that something that you	18	A. Yes.
19	recall, either when you were working with Mr. Josun	19	378. Q. Right. So, presumably you
20	or Mr. Dixit. That you might have been involved in,	20	wouldas part of that exercise you were familiar
21	in some way?	21	with the training manuals. Like you
22	A. I didn'tare you asking if I	22	A. I was.
23	compiled the training manual?	23	379. Qunderstood the contents?
24 25	369. Q. Justwas involved in any way in	24	A. Yes.
L	the preparation, editing, distribution, writing.	25	380. Q. Okay. And did you contribute to the
P	age 63	·	Page 65
1	S. R. Schlacht - 63	4	S. R. Schlacht - 65
2	You tell me. Anything to do with training manuals at all.	2	development of the training manual? Like, did you edit it, or did you improve it if there was
3	A. I was involved lightly with it.	3	something that you could be improved?
	370. Q. Okay. And describe for me what you	4	A. No, that was Grant's responsibility.
5	mean by "lightly"?	5	381. Q. Okay. So, if you had suggestions on
6	A. I wasn't in charge of building it,	6	improving the training manual, would you give them
7	but ifI gave it to the independent contractors,	7	to Grant, and then Grant would edit the training
8	so, I don't know if that's distributing it. I gave	8	manual?
9	it to them as a reference guide. But the person who	9	A. Yes, Grant was responsible for the
10	wrote it, that's Grant. He was in charge of that.	10	training manual.
	371. Q. So, and maybe we can be more	11	382. Q. Okay. But I take it you had input
12	specific about the type of training manuals that	12	into the training manual, but it was through Grant?
13	we're talking about.	13	A. It was through Grant.
14	A. Okay.	14	383. Q. Were there training manuals that
15 16	372. Q. Are these training manuals for	15 16	were prepared specifically for affiliates?
17	independent contractors or affiliates? A. I couldn't be certain. It was just	10	A. NotI think other affiliates wrote their own, but no, there was never an affiliate to
18	like a customer support. And Grant did write one	18	my knowledge.
19	aboutI don't know. I was only in the support	19	384. Q. Okay. Were there ever any other
20	aspect, so anything above that scope wasn't in my	20	training manuals, apart from theto your
21	realm of duties.	21	knowledge, apart from the one that you would give to
	373. Q. But as a customer support person can	22	the independent contractors?
23	you tell me, was there more than one training	23	A. I don't know.
24	manual, or was there just one? What are we talking	24	385. Q. And did Banners Broker have a policy
25	about?	25	manual, to your knowledge?

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	Sheet 18 Page 66		Page 68
	S. R. Schlacht - 66		S. R. Schlacht - 68
1	A. I think there was policies on the	1	stuff.
2	website.	2	396. Q. So, it would be setting up
3	386. Q. Okay. And what did the policies on	3	appointments with lawyers and Mr. Dixit?
4	the Banners Broker website concern?	4	A. That's correct.
5	A. I don't know. I don't remember.	5	397. Q. And the lawyerswas that the
67	387. Q. But you would have known at the	6	Macdonald Sager Manis firm?
8	time, presumably? A. Not off hand. I could reference the		A. Yes. 398. Q. Okay. Was it a Don Gray (phon.),
9	A. Not off hand. I could reference the website. But that wasn'tI didn't deal with any	9	398. Q. Okay. Was it a Don Gray (phon.), was the lawyer?
10	of those things in my duties.	10	A. No.
11	388. Q. So, if an independent contractor had	111	399. Q. David Gray?
12	a question for you on a policy, would you not just	12	A. That I believe so, yes.
13	go to the website and answer the question?	13	400. Q. Okay. And, on occasion did you
14	A. I would. And if I wasn't certain	14	accompany Mr. Dixit to the meetings with David Gray?
15	then I would go to the correct person who could	15	A. I believe one.
16	answer it.	16	401. Q. Okay. And was that a Banners Broker
17	389. Q. Okay. Did you ever have any	17	related meeting?
18	dealings with Banners Brokerswith lawyers who	18	A. No. Stellar Point related.
19	might have acted for Banners Broker?	19	402. Q. And what elsewhat was the purpose
20	A. For Banners Broker International?	20	of the Stellar Point related meeting?
21	390. Q. Or Banners Broker Limited. So	21	A. I don't remember, sorry. It was so
22	maybe, because I appreciate that you have this	22	long ago.
23 24	distinction in your mind, which is a fair one. So,	23	403. Q. Did you take notes at the meeting?
24	let's start with Banners Broker Limited? A. Limited?	24	A. I may have. 404. Q. Okay. I mean, as an executive
L	Page 67		Page 69
	S. R. Schlacht - 67		S. R. Schlacht - 69
1	391. Q. Or Stellar Point, because it became	1	assistant, I take itwas it your habit to take
2	Stellar Point.	2	notes, or
3	A. What do you mean? Can you clarify	3	A. Yes.
4	the question?	4	405. Q. Okay. And what didand if you had
5	392. Q. Did you ever deal with in the course	5	taken notes orlet me put it this way. Are there
6	of your working for, first of all, Mr. Josun, and	6	any, and Karen perhaps you want to answer this. One
7	subsequently Mr. Dixit. Did you ever have any	7	of the things that the Receiver is interested in
8	meetings or contacts, or telephone calls, or	8	receiving, and it's a question we ask of all
9	correspondence with lawyers?	9	witnesses. Are there any Banners Broker, Stellar
10	A. I did.	10	Point or Dixit related holdings files, records,
11	393. Q. Okay. And so, tell me about that.	11	notes, correspondence, documents, data that
13	Were there a lot of meetings, or were there just some?	13	MS. DOSANJH: Right. I saw that in one of the
14	A. I don'ttwo people can have a	14	406. MR. WARD: Right.
15	different opinion of a lot.	15	MS. DOSANJH:orders as well.
16	394. Q. M'hmm. So, why don't you just tell	16	407. MR. WARD: That you've either brought
17	me what was the nature and extent of your contacts	17	with you today
18	with lawyers on behalf of	18	THE DEPONENT: No.
19	A. Limited. I only booked the	19	408. MR. WARD:or alternatively you have
20	appointments. I maybe sat in on a few, but	20	access to and that you can give us an
21	generally speaking it was just setting the	21	undertaking to produce?
22	appointment up if there was one needed.	22	THE DEPONENT: No.
23	395. Q. Okay. And so, would that be setting	23	MS. DOSANJH: I would have to ask.
1			
24 25	up an appointment withfor Mr. Josun, or Mr A. No, no. I never did any of that	24 25	THE DEPONENT: Yes, no. I took all my notes on a computer and when I was let

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	Sheet 19 Page 70	Page 72	
		chlacht - 70 S. R. Schlacht -	.72
1	go	1 bookkeepers?	
2	MS. DOSANJH: Did you return the		
3	computer?	2 A. I didn't do any of that. That 3 wasn't on my duties.	
4	THE DEPONENT: I returned it. Ye	s, it 4 419. Q. Did you have any contacts with	
5	was a laptop.	5 accountants or bookkeepers in your capacity as	
6	MS. DOSANJH: Okay.	6 working for Mr. Josun	
7	409. MR. WARD: Okay.	7 Å. Um	
	403, MIN. WAND. Okay.		
8	MS. DOSANJH: I get what your say	ring. 8 420. Qjust let me question on the	
9	Like an undertaking for disclosure.	9 record.	
10	THE DEPONENT: Yes, no. I don't	have 10 A. Okay.	
11	anything.	11 421. Q. And Mr. Dixit? And I use the word	
12	MŚ. DOSANJH: I don't know if she		,
13	any.	13 telephone calls?	
14	THE DEPONENT: Sorry.	A. With Mr. Josun, I organized his	
15		15 receipts once.	
16	BY MR. WARD:	16 422. Q. Okay, but that wouldn't	
17	410. Q. And the laptop, you returned i	t when 17 A. I didn't do anything. Oh, you mean	
18	you were let go. To who?	18 ifI didn't do any accounting myself. Like if I	
19	A. Io, I believe, Mr. Dixit. Tleft	19 had anyI wasn't reallythat wasn't in my duty,	
20	it in the office when I left.	20 but if a receipt was given to me, I would either	
21	411. Q. Okay. And the office, just so	ve're 21 give it to Jeanette, who was the office manager.	
22	clear, was the office in Whitby?	22 423. Q. Right. I'm not talkingStephanie,	
23	A. Five Carlow Court.	23 I'm not talking so much receipts right now, but I'm	
24	412. Q. Five Carlow Court in Whitby?	24 talking	
25	A. That's correct.		1
	A. Mais Wheel.	25 Ă. You mean financials?	
	Page 71	Page 73	73
	Page 71 S. R. S	chlacht - 71 S. R. Schlacht -	73
1	Page 71S. R. S 413. Q. Okay, apart from the Macdona	chlacht - 71 S. R. Schlacht - Id Sager 1 424. Q. No, I'm just talking interacting	73
1 2	Page 71S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe	chlacht - 71 Id Sager 1 424. Q. No, I'm just talking interacting r lawyers 2 with third parties, like for instance Mary Febbrini?	73
1 2 3	Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during	chlacht - 71 Id Sager 1 424. Q. No, I'm just talking interacting 2 with third parties, like for instance Mary Febbrini? 3 A. If it was setting up meetings.	73
1 2 3	Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker	Page 73 chlacht - 71 Id Sager 1 424. 2 with third parties, like for instance Mary Febbrini? 3 A. Limited or 425.	73
1 2 3 4 5	 Page 71	chlacht - 71 Id Sager r lawyers the Limited or Integration Limited or Chlacht - 71 1 424. Q. No, I'm just talking interacting 2 with third parties, like for instance Mary Febbrini? 3 A. If it was setting up meetings. 4 425. Q. Okay. 5 A. Just basically meeting times.	73
1 2 3 4 5 6	Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker Banners Broker? On behalfand let me A. No.	Page 73 chlacht - 71 Id Sager 1 424. 2 with third parties, like for instance Mary Febbrini? 3 A. If it was setting up meetings. Limited or 4 4 425. Q. Okay. 5 A. 6 426. Q. Setting up meetings for?	73
1 2 3 4 5 6 7	 Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker Banners Broker? On behalfand let me A. No. 414. Qrephrase that question, beca 	Page 73 chlacht - 71 Id Sager 1 424. 2 with third parties, like for instance Mary Febbrini? 2 with third parties, like for instance Mary Febbrini? 3 A. Limited or 4 4 425. 0 Okay. 5 A. 4 426. 0 Setting up meetings for? 1 4. 4 426. 0 Setting up meetings for? 1 A.	73
1 2 3 4 5 6 7 8	 Page 71	Page 73 Schlacht - 71 Id Sager 1 424. 2 with third parties, like for instance Mary Febbrini? 3 A. If it was setting up meetings. Limited or 4 4 425. Q. Okay. 5 A. 6 426. Q. Setting up meetings for? 7 A. wheer 8 427. Q. Mr. Dixit?	73
1 2 3 4 5 6 7 8 9	 Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker Banners Broker? On behalfand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker Limited. Just as a general matter, were there 	Page 73 chlacht - 71 Id Sager 1 424. 2 with third parties, like for instance Mary Febbrini? 3 A. If it was setting up meetings. 4 425. Q. Okay. 5 A. 6 426. 9 A. 9 A. Or whoever she needed to meet with.	
1 2 3 4 5 6 7 8 9 10	 Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker Banners Broker? On behalfand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker Limited. Just as a general matter, were there other lawyers apart from David Gray that yo 	Page 73 Chlacht - 71 Id Sager 1 424. 2 with third parties, like for instance Mary Febbrini? 3 A. the J Limited or 4 use I 6 oker 9 any A. J had She met with Jeanette often because Jeanette was t	
1 2 3 4 5 6 7 8 9 10 11	 Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker Banners Broker? On behalfand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker because the precise of the second second	Page 73 Schlacht - 71 Id Sager 1 424. 2 with third parties, like for instance Mary Febbrini? 3 A. 1 425. 2 Okay. 5 A. 4 425. 9 A. 9 A. 10 She met with Jeanette often because Jeanette was t 10 She met with Jeanette often because Jeanette was t 11 office manager.	
1 2 3 4 5 6 7 8 9 10 11 12	 Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker Banners Broker? On behalfand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker behaltand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker behaltand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker behaltand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker behaltand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker behaltand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker behaltand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker behaltand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broker behaltand let me A. Not that I recall. 	Page 73 Chlacht - 71 Id Sager 1 424. 2 with third parties, like for instance Mary Febbrini? 3 A. If it was setting up meetings. 4 425. Limited or 4 use I 6 oker 9 any A. J had 10 She met with Jeanette often because Jeanette was t 11 office manager. 12 428. Q. And who is "she" that you're	
1 2 3 4 5 6 7 8 9 10 11 12 13	 Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker Banners Broker? On behalfand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broke Limited. Just as a general matter, were there other lawyers apart from David Gray that yo contact with? A. Not that I recall. 415. Q. In relation to the work that you 	Page 73 chlacht - 71 Id Sager 1 424. 2 with third parties, like for instance Mary Febbrini? 3 A. 1 425. 2 With third parties, like for instance Mary Febbrini? 3 A. 4 425. 4 425. 9 A. 9 A. 9 A. 9 A. 10 She met with Jeanette often because Jeanette was t 10 She met with Jeanette often because Jeanette was t 11 office manager. 12 428. Q. 13 referring to?	
1 2 3 4 5 6 7 8 9 10 11 12 13 14	 Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker Banners Broker? On behalfand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broke Limited. Just as a general matter, were there other lawyers apart from David Gray that yo contact with? A. Not that I recall. 415. Q. In relation to the work that you at Banners Broker? 	Page 73 chlacht - 71 Id Sager 1 424. Q. No, I'm just talking interacting 2 with third parties, like for instance Mary Febbrini? 3 A. If it was setting up meetings. 4 425. Q. Okay. 5 A. 5 A. 9 A. 10 She met with Jeanette often because Jeanette was t 11 office manager. 12 428. Q. 13 referring to? 14 A. 14 A.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	 Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker? On behalfand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broke Imited. Just as a general matter, were there other lawyers apart from David Gray that yo contact with? A. Not that I recall. 415. Q. In relation to the work that you at Banners Broker? A. No. I don't remember. Sorry, I 	Page 73 chlacht - 71 Id Sager 1 424. Q. No, I'm just talking interacting 2 with third parties, like for instance Mary Febbrini? 3 A. It it was setting up meetings. Limited or 4 4 425. Q. Okay. 5 A. 4 426. Q. Setting up meeting times. 6 426. 9 A. 10 She met with Jeanette often because Jeanette was t 11 office manager. 12 428. Q. 13 referring to? 14 A. 15 429.	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Page 71 S. R. S 413. Q. Okay, apart from the Macdona Manis and David Gray, were there any othe or law firms that you had contact with during period you were working at Banners Broker Banners Broker? On behalfand let me A. No. 414. Qrephrase that question, beca appreciate you were working at Banners Broke during the lawyers apart from David Gray that yo contact with? A. Not that I recall. 415. Q. In relation to the work that you at Banners Broker? A. No. I don't remember. Sorry, I don't think so. 	Page 73S. R. Schlacht -1 424. Q. No, I'm just talking interacting1 424. Q. No, I'm just talking interacting2 with third parties, like for instance Mary Febbrini?3 A. If it was setting up meetings.4 425. Q. Okay.5 A. Just basically meeting times.6 426. Q. Setting up meetings for?7 A. Whoever.8 427. Q. Mr. Dixit?9 A. Or whoever she needed to meet with.10 She met with Jeanette often because Jeanette was t11 office manager.12 428. Q. And who is "she" that you're13 referring to?14 A. Jeanette Kennedy.15 429. Q. Right, but who would meet with16 Jeanette Kennedy?	
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	Sheet 20 Page 74		Page 76 4 / 0
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5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. I don't know her last name, I'm sorry. 437. Q. Was it Mary from Liberty Tax Services? A. Yes. 438. Q. Okay. And the meetings that you set up, where would they take place? A. Mostly it was just a brief to come pick up receipts, or if she needed to speak to Raj directly, it would be in his office. 439. Q. Okay, so Mary would come to the Stellar Point office to meet with people, correct? A. Correct. 440. Q. From time to time? 	5 6 7 9 10 11 12 13 14 15 16 17 18	somebody else who did that? A. There was someone else who wrote up the invoices. I just passed on the information. 448. Q. Okay. And so, when the invoice came in from the third party, for example in relation to Manchester. A. M'hmm. 449. Q. Who would you pass it on to? A. If it cameit depends. I already answered that. I would either pass it on directly to Brea, or I would pass it to either Jeanette or show it Raj. But Jeanette was in charge of paying bills for Stellar Point, so most likely it would be her.
19 20 21 22 23 24 25	 A. From time to time, correct. 441. Q. Okay. And in terms of the next matter that I want to talk about was paying bills on behalf of, for example, Kuldip Josun and then subsequently Rajiv Dixit. A. M'hmm. 442. Q. Banners Broker Limited or Stellar 	19 20 21 22 23 24 25	 450. Q. And what's Jeanette's last name? A. Kennedy. 451. Q. So, apart from passing on the invoices that came in to Jeanette, or in some cases Raj or Brea. Were you involved in any other aspect of paying those invoices? A. No.

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Sheet 21 Page 78	Page 80
S. R. Schlacht - 78	S. R. Schlacht - 80
1 452. Q. Once they were approved you wouldn't	1 information.
2 be responsible for either putting a cheque in the	2 462. Q. Okay.
3 mail or arranging a wire to pay the service	3 463. Q. Just in terms of email accounts, did
4 provider?	4 you StephanieI assume that you had your own
5 A. I didn't haveit wasn't in my job	5 Banners Broker email account?
6 description. Like I would just passed it on. And	6 A. I had a Stellar Point email account.
7 then I would follow up to make sure that it was	7 464. Q. Okay, and prior to Stellar Point,
8 paid, but I wasn't the one paying them. I didn't	did you have a Banners Broker email account?
9 have that responsibility. 10 453. Q. And you didn't do that at all. I	A. I believe so.
	10 465. Q. Okay. So, you had a personal
	11 A. Personal. 12 466. Qones?
 13 something that you didn't do? 14 A. I didn't have access to bank 	
15 accounts.	
16 454. Q. Okay.	
17 A. For Stellar Point. Like I said, if	16 personal Banners Broker related email accounts as 17 well?
18 something neededto my knowledge, I recall I	118 A. His Stellar Point. I had access to
19 dropped off a cheque for the sewage once, but I	19 his Stellar Point email.
20 wasn'tit was Jeanette Kennedy's responsibility	20 468. Q. And was that because in the course
21 for those things.	
22 455. Q. And was Jeanette Kennedy at Stellar	 of your duties as executive assistant you would have to go into his inbox and review his emails and
23 Point throughout the entire period that you were	23 A. Yes.
24 there?	24 469. Qrespond to them?
25 A. She was.	25 A. I wouldn't have to respondI would
Page 79	Page 81
S. R. Schlacht - 79	S. R. Schlacht - 81
1 456. Q. Let's talk a bit about bank	1 respond to the ones that I could.
2 accounts. And in fairness, this is something that	2 470. Q. Okay.
3 we'll get to a bit later too with reference to some	3 A. But it wasn'tyes.
4 of the documents.	4 471. Q. Okay. And was that something that
5 A. Yes.	5 you would do on a day to day basis?
6 457. Q. But you mentioned that you didn't	6 A. Yes.
7 have signing authority on bank accounts?	
	7 472. Q. What about Chris Smith or Kuldip
8 A. Štellar Point, no. I was briefly on	8 Josun. Did you similarly have
8 A. Štellar Point, no. I was briefly on 9 Dixit Holding, just in case I needed to pay a bill,	8 Josun. Did you similarly have 9 A. No.
8 A. Štellar Point, no. I was briefly on 9 Dixit Holding, just in case I needed to pay a bill, 0 but I think I only signed one cheque and then I was	8 Josun. Did you similarly have 9 A. No. 10 473. Qaccess to their email accounts?
8 A. Štellar Point, no. I was briefly on 9 Dixit Holding, just in case I needed to pay a bill, 0 but I think I only signed one cheque and then I was 1 removed. It was just forwhat's the word I'm	8Josun. Did you similarly have9A.10473.11A.No I didn't.
 A. Štellar Point, no. I was briefly on Dixit Holding, just in case I needed to pay a bill, but I think I only signed one cheque and then I was removed. It was just forwhat's the word I'm looking forI don't know. I was Raj's assistant, 	8Josun. Did you similarly have9A. No.10473.Qaccess to their email accounts?11A. No I didn't.12474.Q. Was there anyone else within Stellar
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8 A. Štellar Point, no. I was briefly on 9 Dixit Holding, just in case I needed to pay a bill, 10 but I think I only signed one cheque and then I was 11 removed. It was just forwhat's the word I'm 12 looking forI don't know. I was Raj's assistant, 13 so you know what I mean. It made things easier, but 14 I would never use it.	8Josun. Did you similarly have9A.10473.11A.12474.13Point that you had access to their email accounts?14A.14A.
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 A. Štellar Point, no. I was briefly on Dixit Holding, just in case I needed to pay a bill, but I think I only signed one cheque and then I was removed. It was just forwhat's the word I'm looking forI don't know. I was Raj's assistant, so you know what I mean. It made things easier, but I would never use it. 458. Q. So, that's Dixit Holdings side, right? 	8 Josun. Did you similarly have 9 A. No. 10 473. Q. access to their email accounts? 11 A. No I didn't. 12 474. Q. Was there anyone else within Stellar 13 Point that you had access to their email accounts? 14 A. No. 15 475. Q. Through the course of fulfilling 16 your responsibilities?
 A. Štellar Point, no. I was briefly on Dixit Holding, just in case I needed to pay a bill, but I think I only signed one cheque and then I was removed. It was just forwhat's the word I'm looking forI don't know. I was Raj's assistant, so you know what I mean. It made things easier, but I would never use it. 458. Q. So, that's Dixit Holdings side, right? A. Yes. 	8 Josun. Did you similarly have 9 A. No. 10 473. Q. access to their email accounts? 11 A. No I didn't. 12 474. Q. Was there anyone else within Stellar 13 Point that you had access to their email accounts? 14 A. No. 15 475. Q. Through the course of fulfilling 16 your responsibilities? 17 A. No.
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 A. Štellar Point, no. I was briefly on Dixit Holding, just in case I needed to pay a bill, but I think I only signed one cheque and then I was removed. It was just forwhat's the word I'm looking forI don't know. I was Raj's assistant, so you know what I mean. It made things easier, but I would never use it. 458. Q. So, that's Dixit Holdings side, right? A. Yes. 459. Q. But in terms of Stellar Point then? A. No, I was never on the bank account. 460. Q. So, you never had signing authority in any bank accounts? 	8 Josun. Did you similarly have 9 A. 10 473. Q. 11 A. No I didn't. 12 474. Q. Was there anyone else within Stellar 13 Point that you had access to their email accounts? 14 A. No. 15 475. Q. Through the course of fulfilling 16 your responsibilities? A. No. 17 A. No. 18 476. Q. How about opening mail that came 19 into Stellar Point? Was that something that A. 20 A. No. 21 477. Q. you would do as well?
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 A. Štellar Point, no. I was briefly on Dixit Holding, just in case I needed to pay a bill, but I think I only signed one cheque and then I was removed. It was just forwhat's the word I'm looking forI don't know. I was Raj's assistant, so you know what I mean. It made things easier, but I would never use it. 458. Q. So, that's Dixit Holdings side, right? A. Yes. 459. Q. But in terms of Stellar Point then? A. No, I was never on the bank account. 460. Q. So, you never had signing authority in any bank accounts? A. No. 	8 Josun. Did you similarly have 9 A. No. 10 473. Q. access to their email accounts? 11 A. No I didn't. 12 474. Q. Was there anyone else within Stellar 13 Point that you had access to their email accounts? 14 A. No. 15 475. Q. Through the course of fulfilling 16 your responsibilities? A. No. 17 A. No. 18 476. Q. How about opening mail that came 19 into Stellar Point? Was that something that 20 20 A. No. 21 477. Q. you would do as well? 22 A. No.

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1	479. Q. All right, just to continue on then.	1 A. M'hmm.
2	In terms of the mail that would come in that was	2 492. Q. And can you just describe for me
3	addressed to yourself. Presumably you would open	3 what Stellar Point was doing for Banners Broker in
4	that Stephanie?	4 relation to the social media presence?
5	A. I never received any mail addressed	4 relation to the social media presence? 5 A. That wasn't in any realm of my job
6	to myself.	6 description but I believeI couldn't answer that.
7	480. Q. And if there was mail that came in	7 I don't know. Probably a Facebook account. Or no,
8	that was addressed to Mr. Dixit, would you open that	8 I don't even think so. I don't know, sorry.
9	for him in your capacity as	9 493. Q. But you knew that
10	A. No.	10 A. There was social media people hired.
11	481. Qhis executive assistant?	11 I'm not sure if they did it for Banners Broker or if
12	A. I would put it on his desk.	12 it was for Stellar Point. Trying to promote Stellar
13	482. Q. And similarly, courier packages,	13 Point to gain different clients.
14	deliveries, anything of that nature. How would you	14 494. Q. Right.
15	handle that?	15 A. I'm not sure. I wasn't involved in
16	A. I would put it on his desk.	16 that.
17	483. Q. Without opening them?	17 495. Q. Okay. So, you had no involvement in
18	A. Well if they were bills that were	18 monitoring social media. What about
19	coming in, those went to Jeanette.	19 updatingcorrect?
20 21	484. Q. Right.	20 A. Sorry?
21	A. And most of the mail went to her.	21 496. Q. Did yo have any involvement in
23	If a package came I didn't generally open them to my	22 monitoring Facebook or Twitter accounts on behalf of 23 Stellar Point or Banners Broker?
23	knowledge. 485. Q. But the mail that came in, just to	
25	be clear, you would look at it to see if it was a	
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1	bill, and then either leave it	
	טווו, מות נווכוז כונווכו ובמעכ ונ	1 Broker website?
2	A. It never came to me.	1 Broker website? 2 A. No.
2		2 A. No.
3	A. It never came to me. 486. Qon his desk?	2 A. No.
3 4 5	A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to	2 A. No. 3 498. Q. Any involvement in Banners Broker
3 4 5 6	A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette.	2 A. No. 3 498. Q. Any involvement in Banners Broker 4 mobile? 5 A. No. I don't even know what that is.
3 4 5 6 7	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to 	2A.No.3498.Q.Any involvement in Banners Broker4mobile?5A.No. I don't even know what that is.6499.Q.And we talked about questions coming7in from independent contractors and I think that we
3 4 5 6 7 8	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? 	2 A. No. 3 498. Q. Any involvement in Banners Broker 4 mobile? 5 A. No. I don't even know what that is. 6 499. Q. And we talked about questions coming 7 in from independent contractors and I think that we 8 have covered that. But what about questions that
3 4 5 6 7 8 9	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass 	 A. No. 498. Q. Any involvement in Banners Broker mobile? A. No. I don't even know what that is. A. No. I don't even know what that is. 499. Q. And we talked about questions coming in from independent contractors and I think that we have covered that. But what about questions that came in over email or on the phone from affiliates
3 4 5 6 7 8 9 10	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 	 A. No. 498. Q. Any involvement in Banners Broker mobile? A. No. I don't even know what that is. 499. Q. And we talked about questions coming in from independent contractors and I think that we have covered that. But what about questions that came in over email or on the phone from affiliates of Banners Broker?
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3 4 5 6 7 8 9 10 11 12	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 488. Q. Without opening it? A. I didn't open it on a regular habit. 	2A. No.3498.Q. Any involvement in Banners Broker4mobile?5A. No. I don't even know what that is.6499.Q. And we talked about questions coming7in from independent contractors and I think that we8have covered that. But what about questions that9came in over email or on the phone from affiliates10of Banners Broker?11A. Ah, no.12500.Q. Would youand the question is, did
3 4 5 6 7 8 9 10 11 12 13	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 488. Q. Without opening it? A. I didn't open it on a regular habit. If he asked meif he was out of the office and 	2 A. No. 3 498. Q. Any involvement in Banners Broker 4 mobile? 5 A. No. I don't even know what that is. 6 499. Q. And we talked about questions coming 7 in from independent contractors and I think that we 8 have covered that. But what about questions that 9 came in over email or on the phone from affiliates 10 of Banners Broker? 11 A. Ah, no. 12 500. Q. Would youand the question is, did 13 you have any involvement in responding to questions
3 4 5 6 7 8 9 10 11 12 13 14	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 488. Q. Without opening it? A. I didn't open it on a regular habit. If he asked meif he was out of the office and asked me to open it I'm sure I would have obliged. 	 A. No. 498. Q. Any involvement in Banners Broker mobile? A. No. I don't even know what that is. 499. Q. And we talked about questions coming in from independent contractors and I think that we have covered that. But what about questions that came in over email or on the phone from affiliates of Banners Broker? A. Ah, no. 500. Q. Would youand the question is, did you have any involvement in responding to questions that came in from Banners Broker affiliates?
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 488. Q. Without opening it? A. I didn't open it on a regular habit. If he asked meif he was out of the office and asked me to open it I'm sure I would have obliged. 489. Q. Were you involved inwe talked about paying bills and you have told me about that. What about paying other employees within Stellar Point or anything 	 A. No. 498. Q. Any involvement in Banners Broker mobile? A. No. I don't even know what that is. 499. Q. And we talked about questions coming in from independent contractors and I think that we have covered that. But what about questions that came in over email or on the phone from affiliates of Banners Broker? A. Ah, no. 500. Q. Would youand the question is, did you have any involvement in responding to questions that came in from Banners Broker affiliates? A. No. 501. Q. Okay. So, ifwho would respond to questions that came into Mr. Dixit from Banners Broker affiliates?
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 488. Q. Without opening it? A. I didn't open it on a regular habit. If he asked meif he was out of the office and asked me to open it I'm sure I would have obliged. 489. Q. Were you involved inwe talked about paying bills and you have told me about that. What about paying other employees within Stellar Point or anything A. No. 490. Q. You didn't have any involvement in 	 A. No. 498. Q. Any involvement in Banners Broker mobile? A. No. I don't even know what that is. 499. Q. And we talked about questions coming in from independent contractors and I think that we have covered that. But what about questions that came in over email or on the phone from affiliates of Banners Broker? A. Ah, no. 500. Q. Would youand the question is, did you have any involvement in responding to questions that came in from Banners Broker affiliates? A. No. 501. Q. Okay. So, ifwho would respond to questions that came into Mr. Dixit from Banners Broker affiliates? A. Questions that came into the Stellar Point call centre? That would be the team
3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 20 21	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 488. Q. Without opening it? A. I didn't open it on a regular habit. If he asked meif he was out of the office and asked me to open it I'm sure I would have obliged. 489. Q. Were you involved inwe talked about paying bills and you have told me about that. What about paying other employees within Stellar Point or anything A. No. 490. Q. You didn't have any involvement in that? 	 A. No. 498. Q. Any involvement in Banners Broker mobile? A. No. I don't even know what that is. 499. Q. And we talked about questions coming in from independent contractors and I think that we have covered that. But what about questions that came in over email or on the phone from affiliates of Banners Broker? A. Ah, no. 500. Q. Would youand the question is, did you have any involvement in responding to questions that came in from Banners Broker affiliates? A. No. 501. Q. Okay. So, ifwho would respond to questions that came into Mr. Dixit from Banners Broker affiliates? A. Questions that came into the Stellar Point call centre? That would be the team hiredthe team hired to answer the phones.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 488. Q. Without opening it? A. I didn't open it on a regular habit. If he asked meif he was out of the office and asked me to open it I'm sure I would have obliged. 489. Q. Were you involved inwe talked about paying bills and you have told me about that. What about paying other employees within Stellar Point or anything A. No. 490. Q. You didn't have any involvement in that? A. No. 	 A. No. 498. Q. Any involvement in Banners Broker mobile? A. No. I don't even know what that is. 499. Q. And we talked about questions coming in from independent contractors and I think that we have covered that. But what about questions that came in over email or on the phone from affiliates of Banners Broker? A. Ah, no. 500. Q. Would youand the question is, did you have any involvement in responding to questions that came in from Banners Broker affiliates? A. No. 501. Q. Okay. So, ifwho would respond to questions that came into Mr. Dixit from Banners Broker affiliates? A. Questions that came into the Stellar Point call centre? That would be the team hiredthe team hired to answer the phones. 502. Q. Okay.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 488. Q. Without opening it? A. I didn't open it on a regular habit. If he asked meif he was out of the office and asked me to open it I'm sure I would have obliged. 489. Q. Were you involved inwe talked about paying bills and you have told me about that. What about paying other employees within Stellar Point or anything A. No. 490. Q. You didn't have any involvement in that? A. No. 	 A. No. 498. Q. Any involvement in Banners Broker mobile? A. No. I don't even know what that is. 499. Q. And we talked about questions coming in from independent contractors and I think that we have covered that. But what about questions that came in over email or on the phone from affiliates of Banners Broker? A. Ah, no. 500. Q. Would youand the question is, did you have any involvement in responding to questions that came in from Banners Broker affiliates? A. No. 501. Q. Okay. So, ifwho would respond to questions that came into Mr. Dixit from Banners Broker affiliates? A. Questions that came into the Stellar Point call centre? That would be the team hiredthe team hired to answer the phones. 502. Q. Okay. A. And they had managers in place. But
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	 A. It never came to me. 486. Qon his desk? A. It always came into reception and receptionI don't know. I believe they gave it to Jeanette. 487. Q. But other mail that was addressed to Mr. Dixit would come to you? A. It would come to me and I would pass it on. 488. Q. Without opening it? A. I didn't open it on a regular habit. If he asked meif he was out of the office and asked me to open it I'm sure I would have obliged. 489. Q. Were you involved inwe talked about paying bills and you have told me about that. What about paying other employees within Stellar Point or anything A. No. 490. Q. You didn't have any involvement in that? A. No. 	 A. No. 498. Q. Any involvement in Banners Broker mobile? A. No. I don't even know what that is. 499. Q. And we talked about questions coming in from independent contractors and I think that we have covered that. But what about questions that came in over email or on the phone from affiliates of Banners Broker? A. Ah, no. 500. Q. Would youand the question is, did you have any involvement in responding to questions that came in from Banners Broker affiliates? A. No. 501. Q. Okay. So, ifwho would respond to questions that came into Mr. Dixit from Banners Broker affiliates? A. Questions that came into the Stellar Point call centre? That would be the team hiredthe team hired to answer the phones. 502. Q. Okay.

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4			
	Mr. Dixit's email account, so if there were		then be responsible for sending them.
2	questions that were coming in from affiliates to	23	514. Q. Okay.
3	that account?		A. Or someone. I don't know if it was
4	A. No questions came into his account.	4	him directly, but it wasn't anyone from Stellar
5	504. Q. From affiliates?	5	Point.
6	A. No.	6	515. Q. Okay. And we're talking now about
7	505. Q. How about preparing contract	7	wire transfers to independent contractors. Correct?
8	documents for independent contractors?	8	A. Solely to independent contractors.
9	A. No. I wasn't involved in that.	9	516. Q. Okay. What about wire transfers
10	506. Q. Or forwarding them contract	110	between financial institutions that
11	documents to be signed so that they could become	111	A. No.
12	independent contractors. Was that a part of	12	517. QStellar Point banked with?
13	A. Anything that needed signing was	13	A. The only thing that I was ever
14	generally my duty. But I believe that those were	14	responsible or had knowledge about was just
15	already in place when I started.	15	independent contractors. Nothing also
16	507. Q. I want to talk about wire transfers.	16	independent contractors. Nothing else.
16 17		17	518. Q. Okay. So, who was responsible for,
18	A. Okay. 508. Q. And again, more specifically we'll		within Stellar Point, for wire transfers that went
10		18	between financial institutions and Stellar Point, or
19 20	get to the documents at some point. But as a	19	Stellar Point and Banners Broker International?
20	general matter, did your responsibilities include	20	A. You would have to ask Raj about
21	sending out or receiving wire transfers on behalf of	21	that.
22	Stellar Point?	22	519. Q. Okay.
23	A. No.	23	A. It wasn't me.
24	509. Q. Apart from your formal	24	520. Q. Was it anyonewas it Mr. Dixit
25	responsibilities and duties, was that something that	25	that was responsible for that?
	responsibilities and duties, was that something that	20	that was responsible for that:
L	Page 87	L	Page 89
	Page 87	L	Page 89
	Page 87 S. R. Schlacht - 87	L	
1	S. R. Schlacht - 87 you ever did? Were you ever involved in receiving	1	S. R. Schlacht - 89 A. I don't know.
1	S. R. Schlacht - 87 you ever did? Were you ever involved in receiving or sending wire transfers or wire transfer	1 2	S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart
1 2 3	S. R. Schlacht - 87 you ever did? Were you ever involved in receiving or sending wire transfers or wire transfer instructions?	1 2 3	S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart from Mr. Dixit was responsible for that?
1 2 3	S. R. Schlacht - 87 you ever did? Were you ever involved in receiving or sending wire transfers or wire transfer instructions? A. No. The only wires I was ever	1 2 3 4	S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart from Mr. Dixit was responsible for that? A. I don't know.
1 2 3 4 5	S. R. Schlacht - 87 you ever did? Were you ever involved in receiving or sending wire transfers or wire transfer instructions? A. No. The only wires I was ever responsible for making sure they were sent, was in	1 2 3 4 5	S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart from Mr. Dixit was responsible for that? A. I don't know. 522. Q. Did you everso you never came
1 2 3 4 5 6	S. R. Schlacht - 87 you ever did? Were you ever involved in receiving or sending wire transfers or wire transfer instructions? A. No. The only wires I was ever responsible for making sure they were sent, was in regards to the Ics. So, I took their wire details	1 2 3 4 5 6	S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart from Mr. Dixit was responsible for that? A. I don't know. 522. Q. Did you everso you never came across any records having to do with wire transfers
1 2 3 4 5 6 7	S. R. Schlacht - 87 you ever did? Were you ever involved in receiving or sending wire transfers or wire transfer instructions? A. No. The only wires I was ever responsible for making sure they were sent, was in regards to the Ics. So, I took their wire details and passed them along to Brea and then it was Chris	1 2 3 4 5 6 7	S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart from Mr. Dixit was responsible for that? A. I don't know. 522. Q. Did you everso you never came across any records having to do with wire transfers in the course of
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	 Bage 87	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22	Page 89 S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart from Mr. Dixit was responsible for that? A. I don't know. 522. Q. Did you everso you never came across any records having to do with wire transfers in the course of A. Just to do with independent contractors. But I never sawI was never given any wireI was only given wire information from the independent contractors on where Chris, or whoever he had do it, wire the money. 523. Q. Okay. And apart from wire transfers, because that's one way of transferring money. There's obviously other ways to transfer money between Banners Broker and Stellar Point. A. I was never responsible for any money transfer of any kind. 524. Q. So, you weren't responsible for online banking transfers or A. No. 525. Q. Did you ever deal with a bank called
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	 Bage 87	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Page 89 S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart from Mr. Dixit was responsible for that? A. I don't know. 522. Q. Did you everso you never came across any records having to do with wire transfers in the course of A. Just to do with independent contractors. But I never sawI was never given any wireI was only given wire information from the independent contractors on where Chris, or whoever he had do it, wire the money. 523. Q. Okay. And apart from wire transfers, because that's one way of transferring money. There's obviously other ways to transfer money between Banners Broker and Stellar Point. A. I was never responsible for any money transfer of any kind. 524. Q. So, you weren't responsible for online banking transfers or A. No. 525. Q. Did you ever deal with a bank called Choice Bank?
$ \begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24$	 Bage 87	$ \begin{array}{c} 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\\ 24\\ \end{array} $	Page 89 S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart from Mr. Dixit was responsible for that? A. I don't know. 522. Q. Did you everso you never came across any records having to do with wire transfers in the course of A. Just to do with independent contractors. But I never sawI was never given any wireI was only given wire information from the independent contractors on where Chris, or whoever he had do it, wire the money. 523. Q. Okay. And apart from wire transfers, because that's one way of transferring money. There's obviously other ways to transfer money between Banners Broker and Stellar Point. A. I was never responsible for any money transfer of any kind. 524. Q. So, you weren't responsible for online banking transfers or A. No. So.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Bage 87	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Page 89 S. R. Schlacht - 89 A. I don't know. 521. Q. Do you know whether anyone apart from Mr. Dixit was responsible for that? A. I don't know. 522. Q. Did you everso you never came across any records having to do with wire transfers in the course of A. Just to do with independent contractors. But I never sawI was never given any wireI was only given wire information from the independent contractors on where Chris, or whoever he had do it, wire the money. 523. Q. Okay. And apart from wire transfers, because that's one way of transferring money. There's obviously other ways to transfer money between Banners Broker and Stellar Point. A. I was never responsible for any money transfer of any kind. 524. Q. So, you weren't responsible for online banking transfers or A. No. 525. Q. Did you ever deal with a bank called Choice Bank?

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Sheet 24 Page 90 S. R. Schlacht - 90		S. R. Schlacht - 9
A. No. I didn't deal with any banks.	1	541. Q. Right.
2 527. Q. So, whoI mean you were there for	2	A. But I never had access to it, never
3 twoalmost two years. Do you know who dealt with	3	knew details.
4 banks at Stellar Point?	4	542. Q. So, just while we are on that point,
5 A. The only bank account I had	5	because you'll appreciate it's an important point
6 knowledge was the CIBC Stellar Point account. Any	6	from a Receiver's perspective.
7 other accounts I don't have any knowledge about.	7	A. No, I know.
8 528. Q. Did you know that there were other	8	543. Q. It has nothing to do with you.
9 accounts apart from the CIBC bank account?	9	A. No, I know.
10 A. Are you talking about	10	544. Q. It does have to do with Mr. Josun.
11 BannersChris Smith and Banners Broker	11	What did you hear about the account in Switzerland?
12 International? Are you talking about Stellar Point?	12	A. I just heard thatwhen he
13 529. Q. Well let's start with Stellar Point?	13	
		separated ways that he took off with three, four
14 A. No.	14	million dollars.
15 530. Q. What about Banners Broker	15	545. Q. Okay. And who did you hear that
16 International?	16	from?
17 A. I know Christhrough wordyou	17	A. I can't remember. It wasn't an
18 know people talkI know that he had some offshore	18	executive or anything. It was just an employee, I
19 accounts, but I wouldn't be able to tell you which	19	don't remember though.
20 bank oractually I do know one.	20	546. Q. Like whenit's pretty big news.
21 531. Q. Tell me about that.	21	Because it was your former boss, right. You would
22 A. The one that's in Isle of Man but	22	probably remember
23 that's just because it's public knowledge.	23	A. It was probably
	23	
	25	
· · · · · · · · · · · · · · · · · · ·		A. It was probably around the time just
Page 91 S. R. Schlacht - 91		Page 93 S. R. Schlacht - 93
A. That's the only one that I'm aware		right after Portugal.
2 of.	2	
3 533. Q. So, just to be clear, at no point	3	more about
A. You guys snooped my Facebook, eh?	4	A. No.
5 534. Q. So, apart from the CIBC	5	6/0 () loorning that he may have had an
6 A. Hold on	11 6	549. Qlearning that he may have had an
	0	account in Switzerland with three or four million
7 535. Q. Yes, we'll get to	7	account in Switzerland with three or four million dollars? In terms of who or when, or how?
8 A. Sorry.	7	account in Switzerland with three or four million dollars? In terms of who or when, or how? A. I didn't really ask any questions.
8 A. Sorry.	7	account in Switzerland with three or four million dollars? In terms of who or when, or how? A. I didn't really ask any questions.
A. Sorry. 9 536. Qwe may or may not get to that	7 8 9	account in Switzerland with three or four million dollars? In terms of who or when, or how? A. I didn't really ask any questions. 550. Q. But you were surprised?
A. Sorry. 9 536. Qwe may or may not get to that 10 Stephanie. We may or may not get to that after.	7 8 9 10	account in Switzerland with three or four million dollars? In terms of who or when, or how? A. I didn't really ask any questions. 550. Q. But you were surprised? A. A little bit, yes. That's a lot of
A. Sorry. 9 536. Qwe may or may not get to that 10 Stephanie. We may or may not get to that after. 11 A. Crazy. I'm gonna take myself off	7 8 9 10 11	account in Switzerland with three or four million dollars? In terms of who or when, or how? A. I didn't really ask any questions. 550. Q. But you were surprised? A. A little bit, yes. That's a lot of money.
 A. Sorry. 536. Qwe may or may not get to that Stephanie. We may or may not get to that after. A. Crazy. I'm gonna take myself off Facebook. Sorry, go on. 	7 8 9 10 11 12	account in Switzerland with three or four million dollars? In terms of who or when, or how? A. I didn't really ask any questions. 550. Q. But you were surprised? A. A little bit, yes. That's a lot of money. 551. Q. Okay. And when was the last time
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 A. Sorry. 536. Qwe may or may not get to that Stephanie. We may or may not get to that after. A. Crazy. I'm gonna take myself off Facebook. Sorry, go on. 537. Q. Just to be completely clear, you weren't aware of Stellar Point having any A. No. 538. Qoffshore bank accounts? A. No, just the CIBC one as I stated three times. 	7 8 9 10 11 12 13 14 15 16 17 18	 account in Switzerland with three or four million dollars? In terms of who or when, or how? A. I didn't really ask any questions. 550. Q. But you were surprised? A. A little bit, yes. That's a lot of money. 551. Q. Okay. And when was the last time that you spoke with Mr. Josun? A. Ah, the last 552. Q. Or had any contact with him of any kind? A. It would have been in Portugal. 553. Q. Okay. And how about Christopher
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	Sheet 25 Page 94 O D Callacht 04		Page 96
	S. R. Schlacht - 94		S. R. Schlacht - 96
1	but that has nothing to do with this. Stellar	1	A. Not to my recollection.
2	Pointany issues with Stellar Point would have	2	567. Q. And what did you see Mr. Smith using
3		23	the Vector cards for?
4		4	A. Whenat conventions or I don't
		5	
5			
6		6	
7	Josun or Mr. Dixitwere you issued a Vector card	7	568. Q. For what kinds of things?
8	or cards?	8	A. Dinner. But it wasn'tI could
9	A. Was I issued?	9	probably say only once or twice that I had seen him
10		10	use that card.
11	A. No.	111	
12		12	distributinggiving Vector cards to anyone?
13		13	A. No.
14	know what a Vector card is when we're talking about	14	570. Q. And, how about CIBC Convenience
15	Bannersin the Banners Broker context?	15	Cards. Do you know what that refers to?
16	A. I do.	16	A. I don't know what that is.
17	558. Q. What is a Vector card?	17	571. Q. Did you ever have a CIBCa Stellar
18		18	Point credit card?
19	could withdraw their money from their back office.	19	A. No.
20	It was one of the options.	20	572. Q. Did you ever have a Banners Broker
21	559. Q. Okay. And, apart from affiliates,	21	credit card?
22	did anyone else within the Banners Brokerwithin	22	A. No.
23	the Stéllar Point organization use Vector cards to	23	573. Q. Or any business credit card while
24	your knowledge?	24	you were working at Banners Broker or Stellar Point?
25	A. Sorry, can you repeat that? I wasn't	25	A. No.
160		1161	\neg , NU,
L			
	Page 95		Page 97
	Page 95 S. R. Schlacht - 95		Page 97 S. R. Schlacht - 97
1	Page 95 S. R. Schlacht - 95 listening.]	S. R. Schlacht - 97 574. Q. So, to the extent that you incurred
1 2	Page 95 S. R. Schlacht - 95 listening.]	S. R. Schlacht - 97 574. Q. So, to the extent that you incurred
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1 2 3 4 5 6 7	 Page 95 S. R. Schlacht - 95 listening. 560. Q. Apart from the affiliates, because you have told me that the affiliates could use Vector cards to withdrawn money. A. Yes. 561. Q. Did anyone else, other than affiliates use Vector cards to your knowledge? 	1 2 3 4 5 6 7	 Page 97 S. R. Schlacht - 97 574. Q. So, to the extent that you incurred expenses on behalf of the company, how would you pay for them? A. If I was travelling, I was always travelling with an executive and they covered the expenses. If I had any extra expense, I would keep the receipt and I would submit it in to Jeanette and
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Page 95	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Page 97 S. R. Schlacht - 97 574. Q. So, to the extent that you incurred expenses on behalf of the company, how would you pay for them? A. If I was travelling, I was always travelling with an executive and they covered the expenses. If I had any extra expense, I would keep the receipt and I would submit it in to Jeanette and be reimbursed. 575. Q. I just want to go back then to your compensation. And I know we touched on this a little bit before the break. A. Okay. 576. Q. And you've told me whatto the best of your recollection your salary was. Okay, and we know with Mr. Josun. I have a note that it was in the range of \$40,000. A. M'hmm. 577. Q. Annually, and then with Mr. Dixit it was approximately \$50,000. A. And then it wentI had another promotion, or another pay raise, after that, to like 62.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Page 95 S. R. Schlacht - 95 listening. 560. Q. Apart from the affiliates, because you have told me that the affiliates could use Vector cards to withdrawn money. A. Yes. 561. Q. Did anyone else, other than affiliates use Vector cards to your knowledge? A. To my knowledge, I think some of the staff had them. 562. Q. Some of the Stellar Point staff? A. I wouldn't be able toI can't say for certain. 563. Q. But you arebut it's your evidence that you at no point had used a Vector card? A. I applied for one, but it wasVectorsorry MasterCard pulled the plug on Vector. 564. Q. Okay. A. In regards to Banners Broker before I could get mine. 565. Q. Did you ever see anyone using a Vector card? A. Chris Smith. 	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	 Page 97 S. R. Schlacht - 97 574. Q. So, to the extent that you incurred expenses on behalf of the company, how would you pay for them? A. If I was travelling, I was always travelling with an executive and they covered the expenses. If I had any extra expense, I would keep the receipt and I would submit it in to Jeanette and be reimbursed. 575. Q. I just want to go back then to your compensation. And I know we touched on this a little bit before the break. A. Okay. 576. Q. And you've told me whatto the best of your recollection your salary was. Okay, and we know with Mr. Josun. I have a note that it was in the range of \$40,000. A. M'hmm. 577. Q. Annually, and then with Mr. Dixit it was approximately \$50,000. A. And then it wentI had another promotion, or another pay raise, after that, to like 62. 578. Q. And this was while you were working
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 Page 95 S. R. Schlacht - 95 listening. 560. Q. Apart from the affiliates, because you have told me that the affiliates could use Vector cards to withdrawn money. A. Yes. 561. Q. Did anyone else, other than affiliates use Vector cards to your knowledge? A. To my knowledge, I think some of the staff had them. 562. Q. Some of the Stellar Point staff? A. I wouldn't be able toI can't say for certain. 563. Q. But you arebut it's your evidence that you at no point had used a Vector card? A. I applied for one, but it wasVectorsorry MasterCard pulled the plug on Vector. 564. Q. Okay. A. In regards to Banners Broker before I could get mine. 565. Q. Did you ever see anyone using a Vector card? A. Chris Smith. 566. Q. Okay. Did you ever see Mr. Dixit 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 Page 97 S. R. Schlacht - 97 574. Q. So, to the extent that you incurred expenses on behalf of the company, how would you pay for them? A. If I was travelling, I was always travelling with an executive and they covered the expenses. If I had any extra expense, I would keep the receipt and I would submit it in to Jeanette and be reimbursed. 575. Q. I just want to go back then to your compensation. And I know we touched on this a little bit before the break. A. Okay. 576. Q. And you've told me whatto the best of your recollection your salary was. Okay, and we know with Mr. Josun. I have a note that it was in the range of \$40,000. A. M'hmm. 577. Q. Annually, and then with Mr. Dixit it was approximately \$50,000. A. And then it wentI had another promotion, or another pay raise, after that, to like 62.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Page 95 S. R. Schlacht - 95 listening. 560. Q. Apart from the affiliates, because you have told me that the affiliates could use Vector cards to withdrawn money. A. Yes. 561. Q. Did anyone else, other than affiliates use Vector cards to your knowledge? A. To my knowledge, I think some of the staff had them. 562. Q. Some of the Stellar Point staff? A. I wouldn't be able toI can't say for certain. 563. Q. But you arebut it's your evidence that you at no point had used a Vector card? A. I applied for one, but it wasVectorsorry MasterCard pulled the plug on Vector. 564. Q. Okay. A. In regards to Banners Broker before I could get mine. 565. Q. Did you ever see anyone using a Vector card? A. Chris Smith. 	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	 Page 97 S. R. Schlacht - 97 574. Q. So, to the extent that you incurred expenses on behalf of the company, how would you pay for them? A. If I was travelling, I was always travelling with an executive and they covered the expenses. If I had any extra expense, I would keep the receipt and I would submit it in to Jeanette and be reimbursed. 575. Q. I just want to go back then to your compensation. And I know we touched on this a little bit before the break. A. Okay. 576. Q. And you've told me whatto the best of your recollection your salary was. Okay, and we know with Mr. Josun. I have a note that it was in the range of \$40,000. A. M'hmm. 577. Q. Annually, and then with Mr. Dixit it was approximately \$50,000. A. And then it wentI had another promotion, or another pay raise, after that, to like 62. 578. Q. And this was while you were working

_	Sheet 26 Page 98	Page 100
	S. R. Schlacht - 98	S. R. Schlacht - 10
11	579. Q. And when approximately was that?	
2	A. My last pay raise, I think, was in	1 595. Q. And in terms of the expense 2 reimbursement because you mentioned that there was
	And Loculda't be certain of the event month	
3	April. I couldn't be certain of the exact month	3 athat you could be reimbursed for expenses. How
4	though.	4 didwas there an expense reimbursement policy that
5	580. Q. In what year?	5 was in place when you were at Stellar Point?
6	A. 2013.	6 A. There was. It went all through
7	581. Q. Okay. And how were you paid?	7 Grant. You would just send a spreadsheet of your
8	A. I was paid by cheque.	8 expenses and your receipts. And then it was
9	582. Q. And you were issued T4s	
10	A. Yes.	10 596. Q. And how often did you do that?
11	583. Qin respect of your salary?	A. Most of the time, like I said, I
12	A. Yes.	12 travelled with someone who took care of it. So, it
13	584. Q. And so, I take it as well	13 wasn't very often.
14	thatapart from the money that you received by way	14 597. Q. And what types of expenses
15	of salary, were you paid any bonuses, Stephanie?	15 wouldto the extent that you incurred expenses
16	A. I received one Christmas bonus but	16 personally that you submitted for, what types of
17		
	it was paid to me by cheque.	
18	585. Q. Okay, and tell me about that. When	18 A. Food mainly. If I had to take a
19	and how much, and by who?	19 taxi somewhere. That's pretty much it.
20	A. It was by Banners Broker Limited.	20 598. Q. Anything other than that?
21	586. Q. Okay.	21 A. No.
22	A. So, the same company obviously. And	22 599. MR. WARD: All right. Let's take a
23	it was, I don't know, 600 bucks700.	23 break for lunch.
24	587. Q. Okay. Any other bonuses or money	
25		
25	that was paid to, apart from the salary and the six	25 A LUNCHEON RECESS
25	that was paid to, apart from the salary and the six	Page 101
25	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99	S. R. Schlacht - 101
25	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus?	S. R. Schlacht - 101 S. R. Schlacht - 101 STEPHANIE ROSE SCHLACHT, resumed
25	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No.	S. R. Schlacht - 101 STEPHANIE ROSE SCHLACHT, resumed CONTINUED EXAMINATION BY MR. WARD:
25	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No.	S. R. Schlacht - 101 STEPHANIE ROSE SCHLACHT, resumed CONTINUED EXAMINATION BY MR. WARD:
25 1 2 3 4	that was paid to, apart from the salary and the six S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary	S. R. Schlacht - 101 S. R. Schlacht - 101 STEPHANIE ROSE SCHLACHT, resumed CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that
25 1 2 3 4	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature?	S. R. Schlacht - 101 STEPHANIE ROSE SCHLACHT, resumed CONTINUED EXAMINATION BY MR. WARD: 600. Q. All right. One of the things that we are going to do this afternoon Stephanie, is that
25 1 2 3 4 5	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to	S. R. Schlacht - 101 S. R. Schlacht - 101 STEPHANIE ROSE SCHLACHT, resumed CONTINUED EXAMINATION BY MR. WARD: 600. Q. All right. One of the things that we are going to do this afternoon Stephanie, is that we are going to start to go through the big binder
25 1 2 3 4 5 6	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday.	S. R. Schlacht - 101 STEPHANIE ROSE SCHLACHT, resumed CONTINUED EXAMINATION BY MR. WARD: 600. Q. All right. One of the things that we are going to do this afternoon Stephanie, is that we are going to start to go through the big binder that I know that you have in front of you.
25 1 2 3 4 5 6 7	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay.	S. R. Schlacht - 101 STEPHANIE ROSE SCHLACHT, resumed CONTINUED EXAMINATION BY MR. WARD: 600. Q. All right. One of the things that we are going to do this afternoon Stephanie, is that we are going to start to go through the big binder that I know that you have in front of you. A. M'hmm.
25 1 2 3 4 5 6 7 8	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a	S. R. Schlacht - 101 STEPHANIE ROSE SCHLACHT, resumed CONTINUED EXAMINATION BY MR. WARD: 600. Q. All right. One of the things that we are going to do this afternoon Stephanie, is that we are going to start to go through the big binder that I know that you have in front of you. A. M'hmm. 601. Q. And first of all I want to focus a
25 1 2 3 4 5 6 7 8 9	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin.	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. 8 601. 9 little bit on travel, because I believe you
25 1 2 3 4 5 6 7 8 9 10	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin?	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar
25 1 2 3 4 5 6 7 8 9 10 11	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say?
25 1 2 3 4 5 6 7 8 9 10 11 12	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think it was Stellar Point.	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say? 12 A. For a period of time, yes.
25 1 2 3 4 5 6 7 8 9 10 11 12 13	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think it was Stellar Point. 591. Q. Anything else by way of gifts	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say? 12 A. For a period of time, yes. 13 602. Q. Okay. And what period of time was
25 1 2 3 4 5 6 7 8 9 10 11 12 13	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think it was Stellar Point.	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say? 12 A. For a period of time, yes. 13 602. Q. Okay. And what period of time was
25 1 2 3 4 5 6 7 8 9 10 11 12 13	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think it was Stellar Point. 591. Q. Anything else by way of gifts A. No.	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say? 12 A. For a period of time, yes. 13 602. Q. Okay. And what period of time was 14 that?
25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think it was Stellar Point. 591. Q. Anything else by way of gifts A. No. 592. Q. that you ever received from one	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say? 12 A. For a period of time, yes. 13 602. Q. Okay. And what period of time was 14 that? 15 A. Probably from October 2012 to April
25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think it was Stellar Point. 591. Q. Anything else by way of gifts A. No. 592. Q. that you ever received from one of the companies?	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say? 12 A. For a period of time, yes. 13 602. Q. Okay. And what period of time was 14 that? 15 A. Probably from October 2012 to April 16 2013.
25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think it was Stellar Point. 591. Q. Anything else by way of gifts A. No. 592. Q. that you ever received from one of the companies? A. No.	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say? 12 A. For a period of time, yes. 13 602. Q. Okay. And what period of time was 14 that? 15 A. Probably from October 2012 to April 16 2013. 17 603. 18 Q. Okay. And was there any particular
25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think it was Stellar Point. 591. Q. Anything else by way of gifts A. No. 592. Q. that you ever received from one of the companies? A. No. 593. Q. And what about other benefits, for	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. 8 601. 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say? 12 A. 13 602. 14 that? 15 A. 16 2013. 17 603. Q. 18 Okay. And was there any particular 18 reason why most of your travel in that time period?
25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	that was paid to, apart from the salary and the six Page 99 S. R. Schlacht - 99 or \$700 dollarsthe one time Christmas bonus? A. No. 588. Q. Okay. What about non monetary benefits, like presents, things of that nature? A. No. Other thanno. I'm trying to think. Maybe something small for my birthday. 589. Q. Okay. A. I don't remember. Christmas I got a pin. 590. Q. A Banners Broker pin? A. I would have to look at it. I think it was Stellar Point. 591. Q. Anything else by way of gifts A. No. 592. Qthat you ever received from one of the companies? A. No. 593. Q. And what about other benefits, for instance, was there anydid you have medical	Page 101 S. R. Schlacht - 101 1 STEPHANIE ROSE SCHLACHT, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 600. Q. All right. One of the things that 4 we are going to do this afternoon Stephanie, is that 5 we are going to start to go through the big binder 6 that I know that you have in front of you. 7 A. M'hmm. 8 601. Q. And first of all I want to focus a 9 little bit on travel, because I believe you 10 travelled fairly extensively when you were Stellar 11 Point. Is that fair to say? 12 A. For a period of time, yes. 13 602. Q. Okay. And what period of time was 14 that? 15 A. Probably from October 2012 to April 16 2013. 17 603. Q. Okay. And was there any particular 18 reason why most of your travel in that time period? 19 A. That was when we werethe
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	Sheet 27 Page 102 S. R. Schlacht - 102	1	Page	104	C D Cablacht 101
				٨	S. R. Schlacht - 104
	travelled when you were organizing or participating			А,	Yes. Same purpose.
2	in conventions?	2	613.	. (Q. Anyone else that would use that
3	A. That's correct.	3		approac	h to booking rooms?
4	606. Q. Okay. And, sojust in the	4		A.	Not that I'm aware of. And this was
5	interest of complete disclosure, there's emails in	5			e time I think. One convention or two.
6	there that have to do with various aspects of IC	6	614.		Q. Okay. So in terms of travelling to
			01-		
	training and convention organizing?	{		train the	independent contractors, do youI'm not
8	A. Yes, I saw that.	8			t I have a complete list. But what
9	607. Q. Tell mebecause one thing that I	9		countrie	s do you remember visiting to train Ics?
10	don't understand. There's names that appear in some	10			That I could remember.
11	of the emails that have to do with aliases for	111	615.	. (Q. We'll make a list together.
12	certain of the principals of Banners Broker. Okay.	12		A.	
13	For instance, to your knowledge did	13			's what I can remember off hand. I feel
14	MS. DOSANJH: Do you want to take her to	14			e's a few more, but
15	the document perhaps. Maybe that would	15	616.		Q. Okay.
	the document perhaps. Maybe that would		010.		
16	assist her?	16	047		we didn't visit all of them.
17	THE DEPONENT: I know what he's talking	17	617.		Q. When you say you didn't visit all of
18	about but	18		them, wh	nat do you mean by that. My question is
19	608. MR. WARD: It may, but it's a general	19		which or	nes did you
20	question.	20		А.	Did I visit?
21	MS. DOSANJH: Oh okay.	21	618.	(Qvisit for
22	THE DEPONENT: Can you give me the	22		A.	
23	aliasthe name?	23	619.		2. Physically attend for the purposes
24		24			g independent contractors?
25	BY MR. WARD:	25		Λ	To my knowledge, that list.
1 L J		1 2 3			TO THY KNOWIEUUE, INAL IISI.
L				7 1.	
	Page 103		Page	105	
	S. R. Schlacht - 103			_	S. R. Schlacht - 105
1	S. R. Schlacht - 103 609. Q. Chris Smith. Would you book him	1	Page 620.	G	S. R. Schlacht - 105 O. Okay.
1 2	S. R. Schlacht - 103 609. Q. Chris Smith. Would you book him under the alias "Larry Diamond"?	1 2	620.	C A.	S. R. Schlacht - 105 Q. Okay. But it's been two years, so
1 2 3	S. R. Schlacht - 103 609. Q. Chris Smith. Would you book him under the alias "Larry Diamond"? A. No. I'll explain that. It's	1		C A.	S. R. Schlacht - 105 Okay. But it's been two years, so
1 2	S. R. Schlacht - 103 609. Q. Chris Smith. Would you book him under the alias "Larry Diamond"? A. No. I'll explain that. It's	1 2	620. 621.	A. C	S. R. Schlacht - 105 Okay. But it's been two years, so Now you were in Belize as well at
1 2 3 4	S. R. Schlacht - 103 609. Q. Chris Smith. Would you book him under the alias "Larry Diamond"? A. No. I'll explain that. It's because when they travelled, affiliates could get	1 2 3 4	620. 621.	C A. C some po	S. R. Schlacht - 105 Q. Okay. But it's been two years, so Q. Now you were in Belize as well at int?
1 2 3 4 5	S. R. Schlacht - 103 609. Q. Chris Smith. Would you book him under the alias "Larry Diamond"? A. No. I'll explain that. It's because when they travelled, affiliates could get pretty in your face, and they would actually harass	1 2 3 4 5	620. 621.	C A. C some po A.	S. R. Schlacht - 105 Okay. But it's been two years, so Now you were in Belize as well at int? I was in Belize, ves.
1 2 3 4 5 6	S. R. Schlacht - 103 609. Q. Chris Smith. Would you book him under the alias "Larry Diamond"? A. No. I'll explain that. It's because when they travelled, affiliates could get pretty in your face, and they would actually harass the hotel and try to get the names of where	1 2 3 4	620. 621. 622.	C A. C some po A. C	S. R. Schlacht - 105 D. Okay. But it's been two years, so Now you were in Belize as well at int? I was in Belize, yes. D. And what was the purpose of that
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	Sheet	t 28 Page 106		. Page 108
		S. R. Schlacht - 106		S. R. Schlacht - 108
		there.	1	DISCUSSION OFF THE RECORD
23		A. Raj was looking at potential office	23	THE DEPONENT: March 10th, okay.
4	627.	space. Q. And so, you went in your capacity as	4	THE DEPONENT: March 10th, okay. 640. MR. WARD: So, can you just pass that
5	021.	his executive assistant?	5	back to me?
6		A. As his assistant, yes.	6	buok to mo.
7	628.	. Q. Okay. And do you remember what you	7	BY MR. WARD:
8		did in Belize with Raj in that context?	8	641. Q. With reference to your tweet on 10th
9		A. I didn't go down. He met with a few	9	of March, 2013.
10		people and I didn't attend.	10	A. M'hmm.
11	629.		11	642. Q. You'reyou say, "Well this trip is
12		with him then?	12	off to a weird start." Now was this a Banners
13 14	630.	A. No. Q. In Belize?	13	Broker related trip? And the reason I'm asking is
15	030.	A. We looked at a few office spaces and	14	because it obviously was during a period of employment at Stellar Point.
16		that was it.	16	A. Are you referring to Banners Broker
17	631.		17	International or Banners Broker Limited?
18	0011	A. Yes.	118	643. Q. Either one.
19	632.		19	A. It was to train an office, so it
20		start into this book then, and I am going to	20	would have been Banners Broker Limited. Yes.
21		begin	21	644. Q. And where was the trip to?
22	000	A. Sure.	22	A. Tel Aviv.
23	633.		23	645. Q. Tel Aviv. Okay. So, this was your
24 25		your Twitter feed. And there's a few that I'm going to take you to.	24	Israel trip? A. Yes.
			25	
	Page	S. R. Schlacht - 107		S. R. Schlacht - 109
1		A. Sure.	1	646. Q. Okay. And doand who accompanied
2	634.	Q. Beginning ontwo pages into the	2	you on the Israel trip?
3		production, tab 2 of 5.	23	A. I can't remember. It mightI
4		A. Yes.		
5			4	don't want to say and be wrong, because I think it
	635.	Q. And it's dated March 10, 2013.	5	don't want to say and be wrong, because I think it was Raj and David Hooker. But I can't be certain.
6		Q. And it's dated March 10, 2013. A. March 10?	4567	don't want to say and be wrong, because I think it was Raj and David Hooker. But I can't be certain. 647. Q. But you told me earlier that I think
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Sheet 29 Page 110		Page 112
S. R. Schlacht - 110 think our page number is a little bit off. MS. DOSANJH: Oh okay. THE DEPONENT: That was when we went to	1 2 3	S. R. Schlacht - 112 663. Q. Can you give me their names please? A. Of his children? 664. Q. Noall of them, whoever came on
 4 Cyprus and Greece. 5 6 BY MR. WARD: 7 652. Q. So, this is a tweet dated 24 August 	4 5 6 7	the trip with him. What was theare we talking aboutthe common law spouse. Are you referring to Jennifer Dorazio? A. Yes. I'm sure you have copies of
8 2012. 9 A. Yes. 10 653. Q. And you had mentioned Cyprus and I 11 take it you were also training independent	8 9 10 11	his kids names. Do I need to give that? I mean I can. 665. Q. Well just whojust so we're talking about the same
 contractors in Greece at this time? A. No it wasn't in Greece. It wasthe two countries were put together, but it was in Cyprus. 	12 13 14 15	 A. It was a long time ago, so I'm just going on based on the top of my head. I believe it was Jennifer Dorazio and his two children. 666. Q. Okay. How about his mother-in-law?
6 654. Q. Okay. And with respect to this 7 trip, do you recall who you went with? 8 A. I believe it was just Raj and 9 myself. 20 655. Q. Okay. And when Raj travelled	16 17 18 19 20	Would his mother-in-law travel on A. His mother-in-law? 667. QBanners A. So Jenthey were never married. So, his common law?
21 onwell let me ask you. I have been told that Raj 22 would travel with his family on Banners Broker 23 business. Like 24 A. Um	20 21 22 23 24	668. Q. Well you tell me, becauseapart from the people we have mentioned, was there anyone else that would be family to Rajiv Dixit? A. Well you said Rajiv's mother-in-law.
25 656. Qsorry just let me finish the 	25	Him and Jennifer were never legally married, so it Page 113 S. R. Schlacht - 113
 question. Did you know him to travel with his family on any of the trips? A. There was a few where his mom came 	1 2 3	would be considered 669. Q. Okay, you just A. No, she never came.
 but not on a regular basis, no. 657. Q. And which ones did his mom come on? A. I don't remember. I wouldn'tI 7 think she came 	4 5 6 7	 670. Q. Stephanie you need to let me finish the question, so A. Sorry. 671. Qwe can have a clear record of it.
8 658. Q. Were there many of them? 9 A. No, she only came on one or two. 0 659. Q. And you don't remember which ones? 1 A. We travelled quite often. I don't	8 9 10 11	I'm just trying toI know that weI'm only interested in Banners Broker related travel. A. Okay. 672. Q. So, if it was personal travel,
2 remember. I think one of them was Ireland, but I 3 can't be certain. 4 660. Q. Okay. And what about other family	12 13 14 15	please don't tell me about it. Okay, but for A. There was an event going on but his family came on for personal. So, then that clarifies that.
6 A. Not typically. 7 661. Q. Not typically, but would his son 8 come with him?	16 17 18	673. Q. So his family would accompany him on Banners Broker related A. No, this one specific time his
9 A. There was one trip to Israel where 0 Chris' family came, as well as Raj's family, but 1 that was the only trip. 2 662. Q. And when you say "Raj's family," who	19 20 21 22	family came along. That one time to Israel. 674. Q. Okay. And do you know who paid for thathis family to come on that trip to Israel? A. I can't be certain. It was athey
are you referring to? A A. His common law spouse at the time and his two children.	23 24 25	went on a private plane. 675. Q. Okay. But who would have arranged the private plan?

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	Sheet 30 Page 114	Page 116
	S. R. Schlacht - 114	S. R. Schlacht - 116
1	A. That could have been me. Chris'	1 trip?
23	family went so it could have been Brea. So, I'm	A. The purpose was to set up the office
3	not	3 over there. But then Italy didn't end up becoming
4	676. Q. Did you frequently arrange private	4 an independent contractor because theyI can't
5	planes?	5 remember the reasons, but they didn't end up
5 6 7	A. No.	6 becoming one. So, the trip was to do training but
	677. Q. For Banners Broker?	7 it never ended up amounting to anything.
8	A. No. 678. Q. So. vou would remember it if there	8 686. Q. Italy wasn't 9 A. But we never collected commission or
10		
11	was an instance where you did book a private plane? A. It was eitheryes, there was	10 anything and they never got that far. 11 687. Q. Okay. I've added Italy to the list
12	onethat to Israel. I believe it was myself that	12 of countries that you travelled to
13	booked that but it could have been in correspondence	13 A. Yes.
14	with Brea, because Chris was going as well. And	14 688. Qwith Banners Broker
15	that was her boss.	15 A. Sorry, I forgot about that one.
16	679. Q. So, you're saying that you did book	16 689. Q. Are there any other countries like
17	the privata plane to Israel or you didn't?	17 Italy where you were there for a purpose other than
18	A. I looked into the pricing. I can't	18 training independent contractors or participating in
19	remember if I physically actually booked it. But I	19 conventions?
20	did the sourcing and the pricing.	20 A. To do with Banners Broker?
21 22	680. Q. Okay. And did you price things	21 690. Q. Yes.
22	separately for Chris' family?	22 A. No. 23 691. Q. Or Stellar Point?
23	A. Everything was bookedbecause this was travelled related to Banners Broker, everything	23 691. Q. Or Stellar Point? 24 A. No. Oh, Stellar Point,
25	would have been paid for by Banners Broker	A. No. Oh, Stellar Point, stillthere was an office that was opened in UK,
L	Page 115	
1	S. R. Schlacht - 115 International.	S. R. Schlacht - 117
	S. R. Schlacht - 115 International. 681. Q. Okay.	S. R. Schlacht - 117 and that was Stellar Point. So, we did training there. And in India.
2 3	S. R. Schlacht - 115 International. 681. Q. Okay. A. Or invoiced out as I explained	S. R. Schlacht - 117 1 and that was Stellar Point. So, we did training 2 there. And in India. 3 692. Q. Okay. All right we haven't
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2 3 4 5 6 7 8 9 10 11 12 13 4 5 6 7 8 9 10 11 12 13 4 5 6 7 8 9 10 11 12 13 4 5 6 7 8 9 20 21 22 23 22 23	S. R. Schlacht - 115 International. 681. Q. Okay. A. Or invoiced out as I explained before. 682. Q. Then there's justnext in terms of travel. MS. DOSANJH: We just need a date. 683. MR. WARD: August 2012, off to Italy. And the reason why I'm asking is because there's no reference to Banners Broker MS. DOSANJH: You're August 4th or August 3rd? Is there a 684. MR. WARD: It's 12 August 2012. MS. DOSANJH: Okay, so that should be here. THE DEPONENT: Italy. MS. DOSANJH: Yes, it's kind of THE DEPONENT: Oh yes, Italy I did go too with Lorenzo Guarini. MS. DOSANJH: Off to Italy, yes. I think it's right at the top but it's cut off again, yes.	S. R. Schlacht - 117 and that was Stellar Point. So, we did training there. And in India. 692. Q. Okay. All right we haven't mentionedPortugal I guess was on the list ofon the convention list? A. Yes, that was the first one. 693. Q. Okay. What about within Canada and the United States. Was there any Stellar Point or Banners Broker related travel that you took at any point? A. Other than the Niagara Falls convention, no. 694. Q. And the next thing that I wanted to talk about, and it's not in this book, but there's someI'm just going to give you the name of some companies that you have been associated with. A. Okay. 695. Q. And I need you tell me whether or not, A they're related to Stellar Point or Banners Broker? A. Okay. 696. Q. And secondly whether or not they had any business dealings with Banners Broker?
2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 21 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 2 11 2 11 2 11 2 11 2 11 2 11 2	S. R. Schlacht - 115 International. 681. Q. Okay. A. Or invoiced out as I explained before. 682. Q. Then there's justnext in terms of travel. MS. DOSANJH: We just need a date. 683. MR. WARD: August 2012, off to Italy. And the reason why I'm asking is because there's no reference to Banners Broker MS. DOSANJH: You're August 4th or August 3rd? Is there a 684. MR. WARD: It's 12 August 2012. MS. DOSANJH: Okay, so that should be here. THE DEPONENT: Italy. MS. DOSANJH: Yes, it's kind of THE DEPONENT: Oh yes, Italy I did go too with Lorenzo Guarini. MS. DOSANJH: Off to Italy, yes. I think it's right at the top but it's cut	S. R. Schlacht - 117 and that was Stellar Point. So, we did training there. And in India. 692. Q. Okay. All right we haven't mentionedPortugal I guess was on the list ofon the convention list? A. Yes, that was the first one. 693. Q. Okay. What about within Canada and the United States. Was there any Stellar Point or Banners Broker related travel that you took at any point? A. Other than the Niagara Falls convention, no. 694. Q. And the next thing that I wanted to talk about, and it's not in this book, but there's someI'm just going to give you the name of some companies that you have been associated with. A. Okay. 695. Q. And I need you tell me whether or not, A they're related to Stellar Point or Banners Broker? A. Okay. 696. Q. And secondly whether or not they had any business dealings with Banners Broker?

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	Sheet 31 Page 118		Page 120
	Sheet 31 Page 118 S. R. Schlacht - 118		S. R. Schlacht - 120
11	A. Okay.	1	A. By that I mean I'm the sole owner
2	698. Q. Or any Banners Broker company. And	2	and director, so
3	I'm asking just so your counsel understands. From	3	711. Q. So, you're certain that there no
4	myI'm particularly interested in knowing whether,	4	monies that went into that company?
5	to your knowledge, money went from Banners Broker or	5	A. That bank account had no active. I
6	Stellar Point	6	opened it to start my eyelash business, and I'm just
7	A. Okay.	1 7	starting that now.
8	699. Qor Dixit Holdings	8	712. Q. Okay. RevStar Hosting Inc., the
9	A. Okay.	9	same questions?
10	700. Qto these companies that I'm going	10	A. I was briefly a director on that.
11	to give you the names of. Okay?	11	To my knowledge, there was no money from Banners
12	A. And if I don't know, I just say	12	Broker or Stellar Point put into that company.
13	don't know. Right?	13	713. Q. Okay. You seem less certain with
14	MS. DOSANJH: Right.	14	respect to RevStar. Are you less certain because
15	THE DEPONENT: Ökay.	15	it's possible that somebody else put money in
16		16	without you knowing about?
17	BY MR. WARD:	17	A. No. I'm just
18	701. Q. So, the first company is Global	18	714. Q. So, you're certain that there's no
19	Merchant Pay Inc. Were youand to remind you, you	19	Banners Broker or Stellar Point or Dixit Holdings
20	were a director of that company.	20	money that went into RevStar Hosting?
21 22	A. Briefly and then I was taken off.	21	A. I was only briefly on as a director,
22	702. Q. Okay. So, what relationship did	22	so to my knowledge, no. 715. MR. WARD: So, Karen, tab 5 of the
23	that company have to Banners Broker or any of the companies that we have talked about today so far?	23	715. MR. WARD: So, Karen, tab 5 of the Document Brief.
25	A. None.	24	MS. DOSANJH: Yes. Okay.
	Page 119	J L	Page 121
	S. R. Schlacht - 119		S. R. Schlacht - 121
1	703. Q. Do you know whether or not any	1	716. MR. WARD: And it'sthe page number at
2	Banners Broker or Stellar Point monies would have	23	the bottom ends in 393, so you'll find it
3	been transferred to Global Merchant Pay Inc.?	3	about it about three-quarters of the way
4	A. No.	4	through the production.
5	704. Q. So, you don't know, or you're	5	MS. DOSANJH: In 393. I don't know if
6	certain that there were not.	11 0	
1 /		6	these are paginated. I don't believe this
	A. I'm certain that there was not.	7	these are paginated. I don't believe this copies paginated.
8	705. Q. Okay. And how is it that you're	7	these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38.
9	705. Q. Okay. And how is it that you're certain that no monies were transferred to that	7 8 9	these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay.
9 10	705. Q. Okay. And how is it that you're certain that no monies were transferred to that company?	7 8 9 10	these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says
9 10 11	 Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that 	7 8 9 10 11	these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar
9 10 11 12	 Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 	7 8 9 10 11 12	these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."?
9 10 11 12 13	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group 	7 8 9 10 11 12 13	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct.
9 10 11 12 13 14	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. 	7 8 9 10 11 12 13 14	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct. 718. MR. WARD: So, just take a minute and
9 10 11 12 13 14 15	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. A. M'hmm. 	7 8 9 10 11 12 13 14 15	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct.
9 10 11 12 13 14 15 16	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. A. M'hmm. 707. Q. That's A-L-A-C-O. 	7 8 9 10 11 12 13 14 15 16	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct. 718. MR. WARD: So, just take a minute and review that.
9 10 11 12 13 14 15 16 17	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. A. M'hmm. 707. Q. That's A-L-A-C-O. A. M'hmm. 	7 8 9 10 11 12 13 14 15 16 17	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct. 718. MR. WARD: So, just take a minute and review that. BY MR. WARD:
9 10 11 12 13 14 15 16	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. A. M'hmm. 707. Q. That's A-L-A-C-O. A. M'hmm. 	7 8 9 10 11 12 13 14 15 16	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct. 718. MR. WARD: So, just take a minute and review that. BY MR. WARD: 719. Q. And Stephanie, your name is on this
9 10 11 12 13 14 15 16 17 18 19 20	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. A. M'hmm. 707. Q. That's A-L-A-C-O. A. M'hmm. 708. Q. So, the sameand you were director of that company as well? 	7 8 9 10 11 12 13 14 15 16 17 18	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct. 718. MR. WARD: So, just take a minute and review that. BY MR. WARD:
9 10 11 12 13 14 15 16 17 18 19 20 21	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. A. M'hmm. 707. Q. That's A-L-A-C-O. A. M'hmm. 708. Q. So, the sameand you were director of that company as well? A. That's just solely my own company. 709. Q. Okay. And were any Banners Broker 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct. 718. MR. WARD: So, just take a minute and review that. BY MR. WARD: 719. Q. And Stephanie, your name is on this as secretary?
9 10 11 12 13 14 15 16 17 18 19 20 21 22	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. A. M'hmm. 707. Q. That's A-L-A-C-O. A. M'hmm. 708. Q. So, the sameand you were director of that company as well? A. That's just solely my own company. 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct. 718. MR. WARD: So, just take a minute and review that. BY MR. WARD: 719. Q. And Stephanie, your name is on this as secretary? A. I was 720. Q. Sorry, just let me finish the question.
9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. A. M'hmm. 707. Q. That's A-L-A-C-O. A. M'hmm. 708. Q. So, the sameand you were director of that company as well? A. That's just solely my own company. 709. Q. Okay. And were any Banners Broker 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct. 718. MR. WARD: So, just take a minute and review that. BY MR. WARD: 719. Q. And Stephanie, your name is on this as secretary? A. I was 720. Q. Sorry, just let me finish the question. A. Yes, sorry.
9 10 11 12 13 14 15 16 17 18 19 20 21 22	 705. Q. Okay. And how is it that you're certain that no monies were transferred to that company? A. Because that isn'tbecause that company has nothing to do with Banners Broker. 706. Q. Okay. The next one is Alaco Group Ltd. A. M'hmm. 707. Q. That's A-L-A-C-O. A. M'hmm. 708. Q. So, the sameand you were director of that company as well? A. That's just solely my own company. 709. Q. Okay. And were any Banners Broker or Stellar Point monies transferred into that 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 these are paginated. I don't believe this copies paginated. MS. CRADDOCK: Page 38. MS. DOSANJH: Okay. 717. MR. WARD: At the bottom. It says "Resolution of the director of Stellar Point Inc."? MS. DOSANJH: Correct. 718. MR. WARD: So, just take a minute and review that. BY MR. WARD: 719. Q. And Stephanie, your name is on this as secretary? A. I was 720. Q. Sorry, just let me finish the question.

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	Sheet 32 Page 122	P;	- 490
	S. R. Schlacht - 122		S. R. Schlacht - 124
1 2 3 4	A. Um 722. Q. So, the question is. MS. DOSANJH: Let him finish the question.	1 2 3 4 5	A. Okay. 734. Q. But it suggests to me that on May 15, 2014, Rajiv Dixit transferred you 1,000 common shares, which wereI can tell you that's all the
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 BY MR. WARD: 723. Q. Do you have an explanation for what's set out on this directors resolution? A. Raj had approached me and asked me if I wanted to be secretary. And I had said I would think about it, and then I declined. 724. Q. Okay. Why did you decline to be a secretary of Stellar Point? A. Because around that time I was really homesick and I had actually been in the planning to move back out west. So, I thought that there would be no point in me being associated with any companies if I was planning to give my resignation. 725. Q. Okay. But you appreciate, or did you appreciate that you were also personally an owner of Stellar Point? A. I was never an owner of Stellar Point. 726. Q. Okay. Well, let's just continue 	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 7 21 22 23	 common shares in that company. So, if you could just explain for us what was the reason that you became the 100 percent owner of MS. DOSANJH: Well I think before you put that question to herI mean if you're indicating that is the full amount that was in thatyou're putting somethinga question to the party for her to inadvertently accept that that was the amount of shares being transferred. So, I mean there would be something tobefore she answers that, there would have to be something that's put to her to say well this is what the maximum amount of shares are within this company, because '35. MR. WARD: Well only if it's going to be contentious. And I hoped that wouldn't be. MS. DOSANJH: Okay. Okay. It's just the '36. MR. WARD: Yes.
L	726. Q. Okay. Well, let's just continue	<u> </u>	MS. DOSANJH:nature of the question.
1 2 3 4 5	S. R. Schlacht - 123 then. MS. DOSANJH: Same document? 727. MR. WARD: No, we're going to move on. Just give me a second to turn it up.	1 2 3 4	S. R. Schlacht - 125 737. MR. WARD: If it's going to be contentious, perhaps we can find a shareholders register, but the question doesn't turn on that.
5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	 BY MR. WARD: 728. Q. Did you know that Dixit Holdings Inc. was an 85 percent owner of Stellar Point? A. No, I didn't. 729. Q. So, you didn't know that before I told you A. No. 730. Qtoday? A. That's correct. 731. Q. So, I'm in tab 6 and the production number on the bottom centre is 278. Just take a minute and read that. So, Dixit Holdings Inc. is the company that we're talking about now. A. M'hmm. 732. Q. It isjust so we're clear, it's one of the companies that is part of the receivership proceedings. A. Yes. 	7 7 8 9 10 11 12 13 7 14 15 16 17 18 19 20	 BY MR. WARD: 738. Q. What we're asking for is an explanation as to how it was and why it was, that you came to become an owner of Dixit Holdings Inc. on May 15, 2014? A. Because we were getting married and I don't know. 739. Q. Okay. A. Just made sense. I'm no longerI think that company actually had beenactually I don't know. I don't know anything to do with that company right now. But at that point it was because Raj didn't have a will in place and he wanted to put me on to make sure that if something happened to him that 740. Q. Okay. A. It had nothing to do with Banners Broker or Stellar Point, though, the decision on
23 24 25	733. Q. And so, this is during the period that we're interested in.	24	putting me on there. 41. Q. Okay. So, it had to do with the

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	Sheet 33 Page 126	-, <u></u> , -	Page 128	
	S. R. Schlacht - 126			S. R. Schlacht - 128
1	fact that you were getting married to Rajiv Dixit?	1		MS. DOSANJH: Last page signed by
2	A. M'hmm.	2	755	Stephanie.
3	742. Q. And he asked you to come on as owner	3	755.	MR. WARD: I don't know. I'm looking at
4	of the company?			a page entitled, "Consent of Shareholder to
	A. He didn't ask me to come on. But you			Exemption from Audit, Dixit Holdings Inc."
67	could ask Raj anyway because he is the one that		756.	MS. DOSANJH: Yes. MR. WARD: In fact before we get there,
8	signed it. Right. 743. Q. Wellthat is true, he did sign it.	8	700.	
9	A. Yes.	9		let's look at the page before that. It's entitled, "Resolution of the Shareholder's
10	744. Q. But seeing as you're here today,	10		of Dixit Holdings Inc."
11	just can you	111		THE DEPONENT: Okay.
12	A. It has to do with our marital	12	757.	MR. WARD: And Ran I just direct you,
13	relationship, which I don't have to discuss with	13		particularly, to the first paragraph. So,
14	you, right?	14		take a moment and read it. See that?
15	745. Q. I don't want to know about your	15		
16	marital relationship.	16	BY MR. V	
17	A. Okay.	17	758.	Q. Okay, Stephaniefirst of all, a
18	746. Q. Bút	18		ple of questions. With reference to the
19	A. You can ask him.	19		ountants of the corporation. Can you tell me who
20	747. Q. But apart from what you have told	20		ewho were the accountants in the corporation
21 22	me, do you have any other explanation as to why it	21	at th	is time?
22	is that you became an owner of this company on this	22	Dair	A. I was put on this account because
23	day? A. No.	23		didn't have a will in place. And then as soon
25	748. Q. And what to your understanding in	24	759.	e had a will put in place I was taken off. Q. I appreciate that.
	Page 127		Page 129	
	S. R. Schlacht - 127		Page 129	S. R. Schlacht - 129
1	May of 2014 was the business of Dixit Holdings?	1		A. I don't know, so I wouldn't know any
2	A. I wouldn't be able to answer that.	2	infor	mation.
3	749. Q. Because, presumably you didn't know	3	760.	Q. So, the answer to my question one is
4	then, correct?	4	that	you don't know who the accountants of the
5	A. I didn'tsorry can you repeat your	5		oration were at the time that this resolution
6	question?	6	was	prepared?
	750. Q. In May of 2014, did you have any	7		A. What do you mean by the
8	idea what the business of Dixit Holdings Inc. was?	8		ountants"?
9	A. I didn't know the detailed business.	9	761.	Q. Just as the terms used in the first
10	No.	10	para	graph of your shareholders resolution?
11	751. Q. Did you know more generally what the	11	700	A. No, I don't.
13	business of Dixit Holdings Inc. was?	12	762.	Q. Okay. And it's referring to
14	A. No. Me being put on there was more because we were getting married.	13	Doco	cial statements for the fiscal period end of ember 31, 2013. Do you see that?
15	752. Q. Okay. So, the answer to my question	15	Dece	A. Yes.
16	then is that no, in May of 2014 you didn't have any	16	763.	Q. Have you ever seen those financial
17	idea	17		ments?
18	A. No.	18		A. No, I haven't.
19	753. Q of what the business of Dixit	19	764.	Q. And on the secondon the following
20	Holdings Inc. was?	20		there's a consent, it's dated June 30, 2014.
21	Ă. Correct.	21		s that your signature on the consent?
22	754. Q. Thank you. And then just further on	22		A. That is, yes.
23	in the same production, Karen.	23	765.	Q. And howdo you recall how it was
1-0				
24 25	MS. DOSANJH: Last page signed by her? MR. CRADDOCK: Thirty-one?	24 25		ou came to sign this consent? A. I don't remember.

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	Sheet	34 Page 130		• 49
1	766.	S. R. Schlacht - 130	1 2	S. R. Schlacht - 132 is, how is it that you came to sign these documents? A. I just
3 4 5	767.	signature again on the bottom of the page? A. That is my signature, yes. Q. And similarly, do you recall how it	3 4 5	MS. DOSANJH: Do you rememberdo you not know? Justif you don't remember say it.
6 7 8	768.	was that you came to sign this document? A. This is taking me off, right? Q. No.	6 7 8	THE DEPONENT: I don'tlike I know I signed them but I don't remember reading them. That's my answer.
9 10 11		A. What is that? MS. DOSANJH: I think maybe just ask her if she understands the document.	9 10 11	776. MR. WARD: Okay. THE DEPONENT: Because I don't know what itsome of this stuff means. So, I don't
12 13 14	769.	MR. WARD: Right. MS. DOSANJH: If she's seen it. THE DEPONENT: No, I get it.	12 13 14	remember. But that is my signature. So I did sign them.
15 16 17	770.	MR. WARD: Okay, take a minute and read it first and then I'll ask you if you understand it.	15 16 17	BY MR. WARD: 777. Q. Okay, and you've had an opportunity to review them just now?
18 19 20		MS. DOSANJH: Have you seen this document before? I think maybe just start fromI think that would be appropriate	18 19 20	A. Well I would need to review them in detail. 778. Q. Okay. But you looked at them and
21 22 23	771.	theask her if she's seen the document before. If she's familiar with it? MR. WARD: Yes, soyes, that's where		you don't recall signing them? A. No. 779. Q. Can we agree on that?
24 25	Page 1	I'm trying to get to. So, take a minute and review these pages with your signature,	24 25	A. It's my signature but I don't remember looking at the paper.
1	ruge i	S. R. Schlacht - 131 Stephanie.	1	S. R. Schlacht - 133 780. Q. Okay.
2 3 4		MS. DOSANJH: Have you seen this document before? Is that your signature? THE DEPONENT: That is my signature,	2 3 4	A. I don't remember reading it in detail. 781. Q. Do you recall signing those
5 6 7	772.	yes. MR. WARD: And she'sCounsel, she's	5	documents?
		indicating to what page of the production?	7	 Well, yes, because my signature is on there.
8 9 10	773.	indicating to what page of the production? MS. DOSANJH: Thirty-one. MR. WARD: Okay. MS. DOSANJH: She's indicated that, in	7 8 9 10	on there. 782. Q. Well that's MS. DOSANJH: I think his question isit's one thing that their your
8 9 10 11 12 13	773.	indicating to what page of the production? MS. DOSANJH: Thirty-one. MR. WARD: Okay. MS. DOSANJH: She's indicated that, in reference to her signature, of her recognizing the signature, it's in reference to production 31.	7 8 9 10 11 12 13	on there. 782. Q. Well that's MS. DOSANJH: I think his question isit's one thing that their your signatures, but it's one thing if THE DEPONENT: I probably briefly read it.
8 9 10 11 12 13 14 15	773. 774.	indicating to what page of the production? MS. DOSANJH: Thirty-one. MR. WARD: Okay. MS. DOSANJH: She's indicated that, in reference to her signature, of her recognizing the signature, it's in reference to production 31. MR. WARD: Okay. MS. DOSANJH: Thirty-two I'm assuming?	7 8 9 10 11 12 13 14 15	on there. 782. Q. Well that's MS. DOSANJH: I think his question isit's one thing that their your signatures, but it's one thing if THE DEPONENT: I probably briefly read it. 783. MR. WARD: Okay.
8 9 10 11 12 13 14 15 16 17 18		indicating to what page of the production? MS. DOSANJH: Thirty-one. MR. WARD: Okay. MS. DOSANJH: She's indicated that, in reference to her signature, of her recognizing the signature, it's in reference to production 31. MR. WARD: Okay. MS. DOSANJH: Thirty-two I'm assuming? THE DEPONENT: M'hmm. MS. DOSANJH: Is thatyes. And 33. That's with respect to her beingthat's	7 8 9 10 11 12 13 14 15 16 17 18	on there. 782. Q. Well that's MS. DOSANJH: I think his question isit's one thing that their your signatures, but it's one thing if THE DEPONENT: I probably briefly read it. 783. MR. WARD: Okay. BY MR. WARD: 784. Q. I don't want you to guess. We're just here to know what you specifically recall. And
8 9 10 11 12 13 14 15 16 17 18 19 20 21		indicating to what page of the production? MS. DOSANJH: Thirty-one. MR. WARD: Okay. MS. DOSANJH: She's indicated that, in reference to her signature, of her recognizing the signature, it's in reference to production 31. MR. WARD: Okay. MS. DOSANJH: Thirty-two I'm assuming? THE DEPONENT: M'hmm. MS. DOSANJH: Is thatyes. And 33.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	on there. 782. Q. Well that's MS. DOSANJH: I think his question isit's one thing that their your signatures, but it's one thing if THE DEPONENT: I probably briefly read it. 783. MR. WARD: Okay. BY MR. WARD: 784. Q. I don't want you to guess. We're just here to know what you specifically recall. And you've told me that your signature is on some of these pages that we're looking at. So, I would like to know if you remember how it was that you came to
8 9 10 11 12 13 14 15 16 17 18 19 20	774. BY MF 775.	indicating to what page of the production? MS. DOSANJH: Thirty-one. MR. WARD: Okay. MS. DOSANJH: She's indicated that, in reference to her signature, of her recognizing the signature, it's in reference to production 31. MR. WARD: Okay. MS. DOSANJH: Thirty-two I'm assuming? THE DEPONENT: M'hmm. MS. DOSANJH: Is thatyes. And 33. That's with respect to her beingthat's her signature on those documents. THE DEPONENT: M'hmm.	7 8 9 10 11 12 13 14 15 16 17 18 19 20	on there. 782. Q. Well that's MS. DOSANJH: I think his question isit's one thing that their your signatures, but it's one thing if THE DEPONENT: I probably briefly read it. 783. MR. WARD: Okay. BY MR. WARD: 784. Q. I don't want you to guess. We're just here to know what you specifically recall. And you've told me that your signature is on some of these pages that we're looking at. So, I would like

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	Sheet 35 Page 134		4/J
	Sheet 35 Page 134 S. R. Schlacht - 134	1	S. R. Schlacht - 136
1	A. I can't remember where I signed	1	BY MR. WARD:
2	them. I think it was at the house. I didn't go	2	795. Q. And thatjust so we can finish off
3	into any law firm to sign, or anything.	3	on the point. That's the only explanation you have
4	785. Q. Okay. And when you say the "house"?	4	as to why you signed the documents that we've just
5	A. My house.	5	looked at?
6	MS. DOSANJH: _Maybe ask if she knew what	6	A. I don't know what would be the
2 3 4 5 6 7 8 9	she was signing. The contents of the	7	alternative. I don't know what you're asking.
8	document.	8	796. Q. There's no other reason that you can
9	786. MR. WARD: Yes.	9	think of as to why you signed these documents?
10	THE DEPONENT: No. I didn't really read	10	A. No.
11	it.	11	797. Q. And then, finally. The second last
13	787. MR. WARD: Okay.	12	page of the production. A. The second last page?
14	BY MR. WARD:	14	798. Q. Yes. It says "Form of Transfer." So
15	788. Q. So, you recall, and forgive me for	15	we're moving forward into November 19, 2014.
16	pressing this. I just want to make sure that I	16	A. Okay.
17	understand what it is you're saying. You recall not	17	799. Q. And, first of all, is thatdo you
18	reading it, or	18	recognize that as your signature on the document?
19	A. I probably briefly read it.	19	A. Yes, that's my signature.
20	789. Q. Okay.	20	800. Q. Okay, and take a minute and review
21	A. Like my said, my purpose of being on	21	the document. Read it.
22 23	this was because my husband didn't have a will in	22	A. I understand. This was just giving
23	place, and so	23	the shares back to him.
24	MS. DOSANJH: I think what he's trying	24 25	801. Q. Okay.
25	to get at it is, did you have the		A. Because he had his will in place.
	Page 135		Page 137
1	S. R. Schlacht - 135 opportunity to read the contents of the	1	S. R. Schlacht - 137 802. Q. Do you recall signing this document?
2	document prior to signing? Did you fully	2	802. Q. Do you recall signing this document? A. Basically mythis is our
23	understand them?		relationship, right.
4	THE DEPONENT: I had the opportunity to	3	803. Q. Sure.
5	read them, but I didn't	5	A. The whole plan was for the reason I
6	790. MR. WARD: Okay.	6	stated before. So, when my husband told me to sign
7	THE DEPONENT: read them that	7	and explained what it was for, I signed it.
8	thoroughly.	8	804. Q. And the explanation that he gave
9	791. MR. WARD: Okay.	9	you, and more importantly, your understanding of why
10		10	you were being asked to sign this document, as well
11	BY MR. WARD:	11	as the others.
12	792. Q. But you signed them becausewhy	12	A. Yes.
13	was it that you signed them?	13	805. Q. Was because he didn't have a will in
14 15	MS. DOSANJH: I think she answered with respect to the will.	14 15	place?
16	793. MR. WARD: With the will, okay.	16	A. I was the one that requested something becausethis is going to sound really
17	MS. DOSANJH: Raj didn't have a will in	17	silly. I suffer from anxiety and if anyone suffers
18	place, and that's why.	18	from anxietypeople with anxiety over analyze
19	THE DEPONENT: There was no will in	19	everything and they worry. And werenot that this
	place, so my husband said this isuntil I	20	is relevant to case, but we're going through some
20		21	family issues and I always worrythe biological
20 21	can get my will in place, we'll do this.	121	latility issues and taiways worrythe biological
21	can get my will in place, we'll do this, and then he just told me what I need to	22	mother of the kids is not a fit mom and I'm always
21		22 23	mother of the kids is not a fit mom and I'm always like, if something happens to you, you don't have a
20 21 22 23 24 25	and then he just told me what I need to	22	mother of the kids is not a fit mom and I'm always

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	Sheet	36 Page 138		Page 14	494
		S. R. Schlacht - 138			S. R. Schlacht - 140
1		roperly in place so thatso that was my concern.	1	815.	MR. WARD: Both emails.
23	A	nd he said, ok, until I have my will in place, I'll	23	816.	MS. DOSANJH:both emails, okay. MR. WARD: Yes.
4		ut you on Dixit Holding and then when Dixit oldingand then when my will's in place you won't		010.	THE DEPONENT: This is from when I first
5		eed to be in, I'll take you off. And that was my	5		started, June 30. Okay. Oh sorry, I did
6	u	nderstanding of it.	6		have a Banners Broker email when I first
7	806.	Q. Okay.	7		started.
8	11.	A. So, it was basically me that wanted	8	817.	MR. WARD: Okay.
9 10	tn b/	e security of knowing that I wasn'tif something appened to him I wouldn't belike I don't know	9		THE DEPONENT: I forgot about that. I
11		e financials of the company or anything. You	11		remember what this, give me a second. MS. DOSANJH: Is there ais it kind of
12	kr	now, but as his wife, I know that he owns that.	12		like a sequence of emails that are related
13		o, I just wanted to make sure that there was	13		to this, or is it just like an isolated
14		pmething that I couldif he passed away with no	14		kind of
15	W	III.	15	818.	MR. WARD: I think this is the only one.
16 17		MS. DOSANJH: Like a sense of security? THE DEPONENT: A sense of security.	16		MS. DOSANJH: Okay. I thought there might have just been kind of like a
18	807.	MR. WARD: Okay. So, it was	18	819.	MR. WARD: No. I think this is the only
19	0071	THE DEPONENT: And he did it because I	19	010.	one
20		was driving him crazy.	20		MS. DOSANJH:string of communication
21		WARD	21		that might be
22		. WARD:	22	820.	MR. WARD:that I'm looking at.
23 24	808. th	Q. And so, it was at your suggestion, en, I take it?	23		MS. CRADDOCK: The first email's on the second page.
25	U I	A. Yes. I guess so. Yes. If you	25		MS. DOSANJH: Okay, so this
L	Page 13	.9		Page 141	,
		S. R. Schlacht - 139			S. R. Schlacht - 141
1		n't have anxiety you don't understand that. So,	1		THE DEPONENT: You can ask, I remember.
2 3		at's why I don't know what's on those papers. eally.	23	BY MR.	W/ARD.
4	809.	Q. Okay. Let's just move forward then.	4	821.	Q. So, we both looked at an email
5		oduction at tab 10, please.	5		hange on June 29th and 30th
6		MS. DOSANJH: Email correspondence?	6		A. M'hmm.
7	810.	MR. WARD: Yes, this is email		822. Oha	Q2012, between yourself and
8 9		correspondence. THE DEPONENT: Okay.	8 9	Sne	elley at Vector card.
					Á M'hmm
10	811			823	Á. M'hmm. O And so my first question is and
10 11	811.	MR. WARD: And again, in fairness to	10 11	823. it lo	Á. M'hmm. Q. Andso my first question isand oks like you initiated this contact with
11 12	811.	MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it.	10 11 12	it lo	Q. Andso my first question isand oks like you initiated this contact with elley?
11 12 13		MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem.	10 11 12 13	it loo She	Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct.
11 12 13 14	811. 812.	MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem. MR. WARD: Because I am going to have	10 11 12 13 14	it loo She 824.	 Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct. Q. And in the second sentence of the
11 12 13 14 15		MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem. MR. WARD: Because I am going to have some questions in terms of	10 11 12 13 14 15	it loo She 824. first	 Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct. Q. And in the second sentence of the full paragraph of your email you tell Shelley,
11 12 13 14 15 16	812.	MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem. MR. WARD: Because I am going to have some questions in terms of THE DEPONENT: That's fine.	10 11 12 13 14 15 16	it loo She 824. first "We	 Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct. Q. And in the second sentence of the full paragraph of your email you tell Shelley, a have gone through our website and have made the
11 12 13 14 15 16 17 18		MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem. MR. WARD: Because I am going to have some questions in terms of	10 11 12 13 14 15 16 17 18	it loo She 824. first "We app	 Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct. Q. And in the second sentence of the full paragraph of your email you tell Shelley, e have gone through our website and have made the ropriate changes that you had suggested in your
11 12 13 14 15 16 17 18 19	812.	MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem. MR. WARD: Because I am going to have some questions in terms of THE DEPONENT: That's fine. MR. WARD:what it waswhat was the issue and how you were addressing it. And so	10 11 12 13 14 15 16 17 18 19	it loo She 824. first "We app ema	 Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct. Q. And in the second sentence of the full paragraph of your email you tell Shelley, e have gone through our website and have made the ropriate changes that you had suggested in your ail." So, whatand I don't have the other ail. Okay?
11 12 13 14 15 16 17 18 19 20	812. 813.	MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem. MR. WARD: Because I am going to have some questions in terms of THE DEPONENT: That's fine. MR. WARD:what it waswhat was the issue and how you were addressing it. And so THE DEPONENT: What date is this?	10 11 12 13 14 15 16 17 18 19 20	it loo She 824. first "We app ema ema	 Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct. Q. And in the second sentence of the full paragraph of your email you tell Shelley, e have gone through our website and have made the ropriate changes that you had suggested in your ail." So, whatand I don't have the other ail. Okay? A. Okay.
11 12 13 14 15 16 17 18 19 20 21	812.	 MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem. MR. WARD: Because I am going to have some questions in terms of THE DEPONENT: That's fine. MR. WARD:what it waswhat was the issue and how you were addressing it. And so THE DEPONENT: What date is this? MR. WARD:you'll see that this is a 	10 11 12 13 14 15 16 17 18 19 20 21	it loo She 824. "We app ema ema 825.	 Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct. Q. And in the second sentence of the full paragraph of your email you tell Shelley, e have gone through our website and have made the ropriate changes that you had suggested in your ail." So, whatand I don't have the other ail. Okay? A. Okay. Q. So, it's not as if it's somewhere
11 12 13 14 15 16 17 18 19 20 21 22	812. 813.	MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem. MR. WARD: Because I am going to have some questions in terms of THE DEPONENT: That's fine. MR. WARD:what it waswhat was the issue and how you were addressing it. And so THE DEPONENT: What date is this? MR. WARD:you'll see that this is a chain.	10 11 12 13 14 15 16 17 18 19 20 21 22	it loo She 824. "We app ema ema 825.	 Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct. Q. And in the second sentence of the full paragraph of your email you tell Shelley, e have gone through our website and have made the ropriate changes that you had suggested in your ail." So, whatand I don't have the other ail. Okay? A. Okay. Q. So, it's not as if it's somewhere and I'm not putting it to you, but
11 12 13 14 15 16 17 18 19 20 21	812. 813.	 MR. WARD: And again, in fairness to Stephanie, I'm going to ask you to take a minute and read it. THE DEPONENT: Yes, no problem. MR. WARD: Because I am going to have some questions in terms of THE DEPONENT: That's fine. MR. WARD:what it waswhat was the issue and how you were addressing it. And so THE DEPONENT: What date is this? MR. WARD:you'll see that this is a 	10 11 12 13 14 15 16 17 18 19 20 21	it loo She 824. "We app ema ema 825.	 Q. Andso my first question isand oks like you initiated this contact with elley? A. That's correct. Q. And in the second sentence of the full paragraph of your email you tell Shelley, e have gone through our website and have made the ropriate changes that you had suggested in your ail." So, whatand I don't have the other ail. Okay? A. Okay. Q. So, it's not as if it's somewhere

	Sheet 37 Page 142		Page 144
	S. R. Schlacht - 142		S. R. Schlacht - 144
1	BY MR. WARD:	1	Church Street. So, I would do things for him while
2	826. Q. So, my first question, what is the	12	he was overseas and alsoif there was a few tasks
3	issue that Vector card had	23	that needed done around that office I would do. So,
	A. So		
4			little things like thisit wasn't my duty but
5	827. Qwith the website.	5	someone could say, hey, can you take care of this,
6	MS. DOSANJH: Let him finish.	6	and then I would do it.
/		7	835. Q. Fair enough. Now in the email on
8	BY MR. WARD:	8	the first page, Stephanie'sShelley's writing back
9	828. Q. That Shelley was asking you to	9	to youand I'm on the second email on the first
10	address?	10	page. She says,
11	A. Whenso this was dated to before	11	"Thank you for your immediate action on
12	the convention. So, I would do some odd tasks in	12	our request and the due diligence in
13	the office, so this looks likethere was some	13	contacting members to remove questionable
14	things on the Banners Broker website that weren't up	14	content from the account"
15	tolike MasterCard is very, very, very specific	15	So, thinking about that and looking at this email.
16	about how you can advertise, and I knowI don't	16	Can you describe for me what Shelley's concern was
17	remember all the things, but I remember one thing,	17	with respect to content and how you were addressing
18	there was a screenshot of the MasterCard, but it had	18	that?
19	the number of the cardit was just a fake one,	19	A. Solet me just read it. If I'm
20	starting with 45, which is actually Visa start.	20	remembering correctly, I believe it was
21	That's what a Visa starts with. So, it was just	21	affiliatesin this type of business affiliates
22	little technical things. And the way that	22	create their own pages and they had taken
23	Vectorwhen referring to the Vector MasterCard,	23	screenshots off the Banners Broker website that were
24	you had to have certain verbiage. So, if the	24	wrong, that we needed to fix. And they had
25	verbiage wasn't correctso Shelley and I were just	25	screenshotted them and put them on their personal
	Page 143		
	raue 140		
			Page 145 S. R. Schlacht _ 145
1	S. R. Schlacht - 143	4	S. R. Schlacht - 145
1	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things	1	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those
1 2 2	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website.	1	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their
1 2 3	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website. 829. Q. But earlier I thought that you told	1 2 3	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their agreement with MasterCard.
4	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website. 829. Q. But earlier I thought that you told me that you didn't have any responsibility for	1 2 3 4	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their agreement with MasterCard. 836. Q. The VectorMasterCard's agreement
45	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website. 829. Q. But earlier I thought that you told me that you didn't have any responsibility for updating websites or dealing with Vector card.	1 2 3 4 5	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their agreement with MasterCard. 836. Q. The VectorMasterCard's agreement with
4 5 6	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website. 829. Q. But earlier I thought that you told me that you didn't have any responsibility for updating websites or dealing with Vector card. A. Honestly, I forgot.	1 2 3 4 5 6	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their agreement with MasterCard. 836. Q. The VectorMasterCard's agreement with A. With Vector card. Or sorry
4 5 6 7	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website. 829. Q. But earlier I thought that you told me that you didn't have any responsibility for updating websites or dealing with Vector card. A. Honestly, I forgot. 830. Q. Okay.	1 2 3 4 5 6 7	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their agreement with MasterCard. 836. Q. The VectorMasterCard's agreement with A. With Vector card. Or sorry 837. Q. With Banners?
4 5 6 7 8	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website. 829. Q. But earlier I thought that you told me that you didn't have any responsibility for updating websites or dealing with Vector card. A. Honestly, I forgot. 830. Q. Okay. A. This was so long ago.	1 2 3 4 5 6 7 8	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their agreement with MasterCard. 836. Q. The VectorMasterCard's agreement with A. With Vector card. Or sorry 837. Q. With Banners? A. Well they had MasterCard through
4 5 6 7 8 9	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website. 829. Q. But earlier I thought that you told me that you didn't have any responsibility for updating websites or dealing with Vector card. A. Honestly, I forgot. 830. Q. Okay. A. This was so long ago. 831. Q. So, the answer to my earlier	1 2 3 4 5 6 7 8 9	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their agreement with MasterCard. 836. Q. The VectorMasterCard's agreement with A. With Vector card. Or sorry 837. Q. With Banners? A. Well they had MasterCard through Vector.
4 5 6 7 8 9	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website. 829. Q. But earlier I thought that you told me that you didn't have any responsibility for updating websites or dealing with Vector card. A. Honestly, I forgot. 830. Q. Okay. A. This was so long ago. 831. Q. So, the answer to my earlier question, is that you	1 2 3 4 5 6 7 8 9 10	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their agreement with MasterCard. 836. Q. The VectorMasterCard's agreement with A. With Vector card. Or sorry 837. Q. With Banners? A. Well they had MasterCard through Vector. 838. Q. Right. So, youso based on
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23 24	S. R. Schlacht - 143 going back and forth on tweaking verbiage and things that were on the website. 829. Q. But earlier I thought that you told me that you didn't have any responsibility for updating websites or dealing with Vector card. A. Honestly, I forgot. 830. Q. Okay. A. This was so long ago. 831. Q. So, the answer to my earlier question, is that you A. That's changed, yes. 832. Q. Okay. A. Sorry, I wasn't meaning to not 833. Q. No, that's fine. And I'm notI just want to understand everything that you did in relation to Stellar Point and Banners Broker. I'm not trying to trick your or anything. A. No, no. 834. Q. I just want to have a complete understanding of your involvement. A. Just to make something in perspective. Beforewhile I worked Kul, because he wasin those couple months that I worked	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\9\\20\\22\\23\\24\end{array}$	S. R. Schlacht - 145 website. So, Shelley had asked me to contact those affiliates directly because it was breaching their agreement with MasterCard. 836. Q. The VectorMasterCard's agreement with A. With Vector card. Or sorry 837. Q. With Banners? A. Well they had MasterCard through Vector. 838. Q. Right. So, youso based on Shelley's request, I take it then that you did contact the affiliate members and ask them to remove the questionable content from their accounts? A. That's correct. 839. Q. Then on the next tab, tab 11, of the production binder, there's an email datedsent July 4, 2012. So, just take a minute and review that. A. So, Banners Broker did a version update, I guess around this time. And I have no ideaI guess I was justoh yes, program features. So, Banners Broker started off withyou
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	Sheet 38 Page 146		Page 148	-	496
1 2 3 4	S. R. Schlacht - 146 A. It was just a software update that they had done and I think I was just keeping Raj in the loop. MS. DOSANJH: I think it's in the	1 2 3 4	responsibility for customer serv A. I had to be in the lo the customer service things.		t - 148
5 6 7 8	subject part of the document. 841. MR. WARD: Right, it says "Program Features of the" The subject line says, "Program Features of BB v 2.5."	5 6 7 8	A. When it regards to with the day to day. 848. Q. And when it cam changes to the software?	e to recommending]
9 10 11 12 13	THE DEPONENT: You guys don't have the attachment? 842. MR. WARD: Well there is an attachment to it. MS. DOSANJH: We don't have it though.	9 10 11 12 13	A. Oh, that wasn't me recommend anything. I was ju 849. Q. But I mean if ther extent that customer service co through updating the software,	st an assistant. re'sto the ould be addressed was that somethin	g
14 15 16 17 18	THE DEPONENT: I honestlythis was years ago, I don't 843. MR. WARD: Right. THE DEPONENT: It looks like it was program features of BB version 2.5, so I	14 15 16 17 18	that people would look to you f A. Oh no. Software with software and changes in th solely be Chris Smith. 850. Q. No I appreciate th	anything to do he program would hat. I mean that	
19 20 21 22 23 24 25	was probably updating him on features. Is that it? 844. MR. WARD: Listen, I don't want to get into the detail of the features update. THE DEPONENT: This is the schedule for Portugal, this has nothis is just changes in the programming. Like if there	19 20 21 22 23 24 25	no one was expecting you to ad or A. No, but 851. Qupdate software Amy input, no. MS. DOSANJH: You no finish.).	
1 2 3 4 5 6 7 8 9 10 11 20 21 22	 Page 147 S. R. Schlacht - 147 was a different package colour, orthis was done differently. It was justto the best of my knowledge that's what I would be referring to. That's not the right attachment. That's the Portugal outline. THE DEPONENT: BY MR. WARD: 845. Q. So, returning to the email then, Stephanie. What was yourwhy was it that you were corresponding to Raj on updates to the Banners Broker software? When we talked earlier about your duties, I didn't think that it extended to updating software applications? A. I don't personallypersonally I don't have a degree in programming. I don't do the updates. What it was is the updatesthe changes in version 2.5. Those changes directly affect customer service, because they're changes in the program. And so, I amto the best of my knowledge without reading the attachment, that's probably what I was doing. Program features of BB version 2.5. 	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Page 149 THE DEPONENT: Oka question. BY MR. WARD: 852. Q. But just looking at my mind it raises the question a extent of your involvement in mupdates for Raj A. I 853. Qas opposed to wupdates? A. I 854. Q. Right wupdates? A. And then I was just Here and the loop. 854. Q. 855. Q. 9. Okay. 855. Q. 9. Okay. 855	as to what was the anaging software writing software him informed. ding the . It looks as if bether it was Chris' e programs that e. keeping Raj in	
23 24 25	So, of course Raj would need to be updated. It directly reflects customer service. Right? 846. Q. Okay and you wereyou had a	23 24 25	856. Q. And was the way t That you would keep Raj in the software updates?		

	Sheet 39 Page 150		Page 152
	Sheet 39 Page 150S. R. Schlacht - 150		S. R. Schlacht - 152
1	A. No.	1	A. Yes.
2	857. Q. So, why was it was that you were	23	867. Qof program features. But I'm not
3	doing it on this occasion?		interested in that level of detail. Okay, so we
4	MS. DOSANJH: Do you have I think it	4	don't need the attachment for the purposes of the
5	would be beneficial	5	couple more questions that I have.
6	THE DEPONENT: I don't know. MS. DOSANJH:if she had the	6	A. Okay. 868. Q. All right. But there is a reference
	attachment	8	to a BB update. And, am I reading that correctly to
8 9	THE DEPONENT: Yes, I can't read the	9	think that we're talking about updates to the
10	attachment, I don't know.	10	Banners Broker website?
11	MS. DOSANJH: If there's an attachment,	11	A. That would be correct.
12	because it's kind of like answering	12	869. Q. All right. And tell me again
13	something out without	13	whatwhy it was that you were providing
14 15	THE DEPONENT: Yes, like it's so	14	information to Raj on updateskeeping in mind that
15	simple	15	you're both at Stellar Point
16 17	858. MR. WARD: Let's go off the record.	16	A. M'hmm.
18	THE DEPONENT:to me I don't understand why.	17	870. Qto the Banners Broker website. A. Because Stellar Point was
19	understand wrig.	19	responsible for customer service. Updates or
20	A BRIEF RECESS	20	changes on the website. So, you will have an
21		21	affiliate call in and want to know about the
22 23	STEPHANIE ROSE SCHLACHT, resumed	22	changes. Or why this is like this now or why that
23	CONTINUED EXAMINATION BY MR. WARD:	23	changeso obviously we have to be updated so we
24 25	859. Q. So, let's finish off with tab 11?	24	can
·	A. Okay.	25	871. Q. And Stellar Point was updating the
	Page 151 Q R Schlacht_151		Page 153 S. R. Schlocht - 153
	S. R. Schlacht - 151		S. R. Schlacht - 153
	S. R. Schlacht - 151 860. Q. And I appreciate	1	S. R. Schlacht - 153 Banners Broker website?
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1 2 3 4	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm	1 2 3 4	S. R. Schlacht - 153 Banners Broker website? A. No.
1 2 3 4 5	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what	1 2 3 4 5	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did
1 2 3 4 5	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what I mean. Like I'm not intentionally trying to be	1 2 3 4	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did all the
1 2 3 4 5 6 7	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what I mean. Like I'm not intentionally trying to be likeoops, and then read it and say yes, I did.	1 2 3 4 5 6 7	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did all the 873. Q. Well how did this information come
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1 2 3 4 5 6 7 8 9	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what I mean. Like I'm not intentionally trying to be likeoops, and then read it and say yes, I did. Actuallyjustit's years ago. 861. Q. Okay, and these are emails we're	1 2 3 4 5 6 7 8 9	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did all the 873. Q. Well how did this information come to land in your inbox? A. I wouldn'twho was it from? I
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1 2 3 4 5 6 7 8 9 10 11 2 3	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what I mean. Like I'm not intentionally trying to be likeoops, and then read it and say yes, I did. Actuallyjustit's years ago. 861. Q. Okay, and these are emails we're putting in front of you A. Yes. 862. Qare meant to prompt A. Yes. 863. Qyour memory in terms of how the	1 2 3 4 5 6 7 8 9 10 11 12 13 14	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did all the 873. Q. Well how did this information come to land in your inbox? A. I wouldn'twho was it from? I don't have the email withI don't have the original email that was sent to me so I couldn't tell who it was from. 874. Q. Okay. A. I don't remember.
1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what I mean. Like I'm not intentionally trying to be likeoops, and then read it and say yes, I did. Actuallyjustit's years ago. 861. Q. Okay, and these are emails we're putting in front of you A. Yes. 862. Qare meant to prompt A. Yes. 863. Qyour memory in terms of how the company operated	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did all the 873. Q. Well how did this information come to land in your inbox? A. I wouldn'twho was it from? I don't have the email withI don't have the original email that was sent to me so I couldn't tell who it was from. 874. Q. Okay. A. I don't remember. MS. DOSANJH: So, I guess if there's an
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 2 3 4 5 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 4 5 10 10 10 10 10 10 10 10 10 10 10 10 10	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what I mean. Like I'm not intentionally trying to be likeoops, and then read it and say yes, I did. Actuallyjustit's years ago. 861. Q. Okay, and these are emails we're putting in front of you A. Yes. 862. Qare meant to prompt A. Yes. 863. Qyour memory in terms of how the company operated A. Okay. 864. Qand what the nature of your involvement was at the time? A. Yes, okay. 865. Q. So, please take them in that spirit	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did all the 873. Q. Well how did this information come to land in your inbox? A. I wouldn'twho was it from? I don't have the email withI don't have the original email that was sent to me so I couldn't tell who it was from. 874. Q. Okay. A. I don't remember. MS. DOSANJH: So, I guess if there's an email I thinkafterbefore this date. Are you just asking specifically to the contents of what 875. MR. WARD: I'mam Ican we agree that you were
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what I mean. Like I'm not intentionally trying to be likeoops, and then read it and say yes, I did. Actuallyjustit's years ago. 861. Q. Okay, and these are emails we're putting in front of you A. Yes. 862. Qare meant to prompt A. Yes. 863. Qyour memory in terms of how the company operated A. Okay. 864. Qand what the nature of your involvement was at the time? A. Yes, okay. 865. Q. So, please take them in that spirit as well.	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did all the 873. Q. Well how did this information come to land in your inbox? A. I wouldn'twho was it from? I don't have the email withI don't have the original email that was sent to me so I couldn't tell who it was from. 874. Q. Okay. A. I don't remember. MS. DOSANJH: So, I guess if there's an email I thinkafterbefore this date. Are you just asking specifically to the contents of what 875. MR. WARD: I'mam Ican we agree that you were THE DEPONENT: It would have been from a
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 5 16 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what I mean. Like I'm not intentionally trying to be likeoops, and then read it and say yes, I did. Actuallyjustit's years ago. 861. Q. Okay, and these are emails we're putting in front of you A. Yes. 862. Qare meant to prompt A. Yes. 863. Qyour memory in terms of how the company operated A. Okay. 864. Qand what the nature of your involvement was at the time? A. Yes, okay. 865. Q. So, please take them in that spirit as well. A. Okay. 866. Q. Now this particular production, as we've all agreedwe don't happen to have the	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did all the 873. Q. Well how did this information come to land in your inbox? A. I wouldn'twho was it from? I don't have the email withI don't have the original email that was sent to me so I couldn't tell who it was from. 874. Q. Okay. A. I don't remember. MS. DOSANJH: So, I guess if there's an email I thinkafterbefore this date. Are you just asking specifically to the contents of what 875. MR. WARD: I'mam Ican we agree that you were THE DEPONENT: It would have been from a programmer. I'm guessing. 876. MR. WARD: Right.
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 10 11 12 11 12 11 12 11 12 11 12 11 11 11	S. R. Schlacht - 151 860. Q. And I appreciate A. I read aheadsorry. But I just wantone thing I do want to say is that I'm here to give you guys the information you need. I'm notif I don't remember somethingyou know what I mean. Like I'm not intentionally trying to be likeoops, and then read it and say yes, I did. Actuallyjustit's years ago. 861. Q. Okay, and these are emails we're putting in front of you A. Yes. 862. Qare meant to prompt A. Yes. 863. Qyour memory in terms of how the company operated A. Okay. 864. Qand what the nature of your involvement was at the time? A. Yes, okay. 865. Q. So, please take them in that spirit as well. A. Okay. 866. Q. Now this particular production, as	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 12 11 11	S. R. Schlacht - 153 Banners Broker website? A. No. 872. Q. So, who was updating the Banners Broker website at this time? A. I don't know. I don't know who did all the 873. Q. Well how did this information come to land in your inbox? A. I wouldn'twho was it from? I don't have the email withI don't have the original email that was sent to me so I couldn't tell who it was from. 874. Q. Okay. A. I don't remember. MS. DOSANJH: So, I guess if there's an email I thinkafterbefore this date. Are you just asking specifically to the contents of what 875. MR. WARD: I'mam Ican we agree that you were THE DEPONENT: It would have been from a programmer. I'm guessing.

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	Sheet 4	0 Page 154		Page 156
1		S. R. Schlacht - 154		S. R. Schlacht - 156
1	877.	Q. So, programmersif this email was	1	THE DEPONENT: No, the notes don't. Oh
2		example, then the programmers would send you	2	yes, they do.
3	inf	ormation on updates and you would pass it along	3	MS. DOSANJH: So, then we can agree that
4		Raj?	4	those notes are in relation to that email.
5	10	A. Not on a regular basis. I don't	5	885. MR. WARD: Okay.
6	878.	Q. Okay, but in this instance, is that		THE DEPONENT: It would make sense.
		hat happened?		886. MR. WARD: Okay.
8	¥¥1	A. That wouldto the best of my	8	ooo. Mill Walte. Okay.
9	kn	owledge without seeing the attachment, that's what	9	BY MR. WARD:
10		vould say was the reasoning behind it.	10	
11	879.	Q. There's some notes behind tab 14.	111	
12			12	controversial. But if you didn't prepare the notes
13		ere's an email and then there's someyou		then let me know. It appears that you did.
	pro	bably want to start with the emails.	13	A. I believe I did.
14	!	A. I think I already read it, but I	14	888. Q. Okay. Have a look at the notes and
15		I read it myself. This is from the convention,	15	refresh on them. Is thisdo these notes describe
16	ye:		16	what the affiliates were told in terms of the
17	880.	Q. So, the July 11th notes. Do you	17	termination of Mr. Josun?
18	KN	ow who prepared these?	18	A. Topic meeting announcement of Kul's
19		A. Well it says I attached the notes I	19	termination of affiliatesI think this iswas
20		ok. So	20	going overbecause this was in Portugal. So, this
21	881.	Q. Okay, so	21	would have beenyes, I knowthis would be going
22	000	Asounds like it would be me.	22	throughbecause Kul was terminated soit was
23	882.	Q. And in fact it was you. Correct?	23	damage control, because affiliates wereKul was
24		"A. I don't see why I would lie in the	24	the one that travelled before, so the affiliates
25	em	ail	25	knew Kul. That's who they knew. And so, when Kul
	Page 15	5		Page 157
		S. R. Schlacht - 155		S. R. Schlacht - 157
1		MS. DOSANJH: Well I think he's asking	1	was terminated, or whatever you want to call it,
2		are these notes in reference to the email		
3			2	affiliates werehad questions. So, I think this
		that you facilitated? Is there a	3	affiliates werehad questions. So, I think this was just preparing to make an announcement to
4		that you facilitated? Is there a connection to the notes to the email? I	3 4	affiliates werehad questions. So, I think this was just preparing to make an announcement to affiliates.
45		that you facilitated? Is there a connection to the notes to the email? I don't know	3 4 5	affiliates werehad questions. So, I think this was just preparing to make an announcement to affiliates. 889. Q. Okay. And so, there's questions and
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		that you facilitated? Is there a connection to the notes to the email? I don't know MR. WARD: Thank you, that's helpful. THE DEPONENT: Because I'm not looking at the email, and opening the attachment myself, I can't answer that. You know what I mean? Like if I were reading the email and opening the attachments, I could say 100 percent say those were the notes meant for the attachment, but I can't tell you 100 percent. MS. DOSANJH: Well look at the dates. So, I don't know. If you want to say look at the dates and look at the notes, and maybe THE DEPONENT: Yes, it looks like. MS. DOSANJH: I think the body of the email says July 11th and 12th, and the notes indicate MR. WARD: Right, yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 affiliates werehad questions. So, I think this was just preparing to make an announcement to affiliates. 889. Q. Okay. And so, there's questions and answers. Am I assuming correctly that you preparedyou anticipated these questions and prepared these draft answers? A. I don't know. It could have been questions that affiliates had themselves or that independent contractors had, and thenI don't know if it wasI would never assume an answer so I'm thinking that these answers came directly from Chris. 890. Q. Okay, but I mean they're your notes A. Yes. 891. Qwe've established. And there'sare you documenting a meeting that you attended, or was this prepared in anticipation of a presentation and anticipation of questions? Was this like a script or was this documenting something that had taken place?

	Sheet 41 Page 158		Page 160
	S. R. Schlacht - 158		S. R. Schlacht - 160
1	preparation for a meeting.	1	necessarily
2	892. Q. Okay. But you weren't working for	23	A. Iwas.
3	Chris at the time, were you?		
4	A. No, but I didbecause it was the	4	
5	convention, and I was doing a bit of this and a bit	5	
6	of that, and a bit of everything. When this all	6	
8	came down, I was probably asked just to jump in and take some notes.	8	Stellar Point?
9	893. Q. Okay. And you jumped in and asked	9	A. Only in relation to the conventions. But not for the Portugal one. That was Tara.
10	by Chris to take some notes for him?	10	903. Q. Okay. But with respect to the
11	A. That's whatyes. I believe so.	111	conventions other than Portugal. You would have
12	That's what it looks like there.	12	arranged the security for those conventions?
13	894. Q. But youto the best of yourand	13	A. I would have some part in arranging
14	I'm not going to push this too far, but I justto	14	or I may have pushed the task to someone else.
15	the best of your recollection, these are notes that	15	904. Q. Okay. Delegated it to someone else?
16	Chris dictated to you?	16	A. Delegated, yes.
17	A. Yes.	17	905. Q. And just so we understand. Why was
18	895. Q. In advance of the presentation to	18	it thatwhat sort of security was needed at these
19 20	the affiliates, or after? A. Becauseseebecause I worked	19	conventions?
21	with the independent contractors, I was in the	20	A. If you have ever been to an affiliate marketing type of convention.
22	midstTara worked with them actually, but because	22	906. Q. I haven't.
23	I was there to assist her during the convention.	23	A. There's people of all sorts, all
24	And as soon as this happenedKul was Tara's dad,	24	backgrounds. You have someone that is a
25	right?	25	multi-millionaire and someone who has five bucks in
I	Page 159		Page 161
	S. R. Schlacht - 159		S. R. Schlacht - 161
	896. Q. Right.	1	their bank. So, you get all these personalities.
23	A. So, she totally left the premises.	2	People can become aggressive, especially if they
4	And so I was kind of thrown in to take over her	3	want questions answered or, you know, they want to
5	role, so I feel by reading this that it was probably independent contractors that came up to me	5	speak to Chris, orso they'll do anything. Like they're ruthless. They will hound people down.
6	personally and said I want to know the answers to	6	They'll trap you in a hotel hallway andlike even
7	this, this and this. And then I met up with Chris	7	with me.
8	and Chris answered the questions for me.	8	907. Q. Right.
9	897. Q. Okay, that's helpful. Thank you.	9	A. I was an assistant and I had people
10	And then the next tab in the production book 15.	10	knocking on my hotel. So, the security was just to
11	A. M'hmm.	11	make sure that nothere was no out of control
12	898. Q. There's an email with the subject	12	situations. Because the hotel does not provide the
13	line, "Security, budget and payment." And so, my	13	security. Most often times, you're responsible.
14 15	questionI take itflip through itas part of	14	908. Q. And what levels ofis itI don't
16	your conference organizing responsibilities for Portugal.	15 16	want to generalize if it's not possible, but I understand that there was a fairly extensive
17	A. Is this Portugal?	17	security that was provided for the conferences. Is
18	899. Q. And it may not be, so	18	the receiver correct in assuming that there was
19	A. It's January, February, March,	19	24-hour around the clock security for the principals
20	April, May, June, July 12.	20	of Banners and Stellar Point?
21	900. Q. Would be Portugal.	21	A. I wouldn't be able to remember if it
22	A. This was probablyJuly 12th. I	22	was 24. It was extensive but I don't know if it was
23	don't remember.	23	24 or 15, or
24 25	901. Q. Okay, so more generally, were you	24	909. Q. And security for their families as
20	involved in arranging security for conferences, not	25	well?

.

S. R. Schlacht - 162 S. R. Schlacht - 162 1 A. The families din't revel very MS. DOSANUH: She I guess just capied her. 3 wasn't in charge of security so twollow to eable some that. 4 to answer that. 5 910. O. But you were al Portugal and you saw 6 the carry though and it was security for their 7 A. I did, yes. 8 911. O. Right and it was security for their 9 families as well? 11 did you were al Portugal and you saw 6 families as well? 9 asked me toshe sent me an email and 10 A. I vas so busy organizing the event I 11 did you. 12 Wouldn'tb e able to answort hat. I was either in my 13 that have a predastreet. 14 912. O. Cikay. Tab 17 plase. I don't hink 15 think. No, we're one ahead of you. 16 BY MR. WARD: Chaga. I think that we 17 MS. DOSANUH: Their statched to 17. 18 Yes. Dos and that the same. 19 MR. WARD: Sory, if the I wont get 19 MR. WARD: Sory, if the I wont get		Sheet 42 Page 162	_	.Page 164	
2 often, in Portugal, I believe, there was, but I 2 her. ************************************		S. R. Schlacht - 162		· j	
3 wasn't in charge of security so I wouldn't be able to so were that to answer that. 3 922. MR. WARD: WYARD: WARD: to read it. 4 10 0. But you were at Portugal and you saw the security though? 5 7 A. 1dd yes. THE DEPONENT: The reseller for 8 911. 0. Right and it was security for the' 9 families as well? 7 A. 10 A. Idd yes. Portugal that was be assistant. And she asseed me to forwarddid she even send it 11 didn't even see the families fail the time so I 10 asked me to forwarddid she even send it 11 bid the two sees the families fail the time so I 11 to me? Yes. She semit to me and asked me 12 With WARD: Tast 7 plases. I don't thick that have a spreadsheet. 13 to orwarddid she even send it 13 there same	1		1		
4 to answer that 4 to Stephanie intending tou. 5 910. Q. Bjut you were at Portugal and you saw 5 THE DEPONENT: for an answer that. 6 the security though? A. I did, yes. 5 THE DEPONENT: for an answer that. 7 A. I did, yes. 7 A. I did, yes. 7 THE DEPONENT: for answer that. 9 0. A. I was so busy organizing the event I 1 7 THE DEPONENT: for answer that. 10 A. I was so busy organizing the event I 10 asked me to forwarddid she even send it 11 to first inters as well? 10 asked me to forwarddid she even send it 11 to me? Yas. She sent it to me and asked me 12 to torward it. So. I simply just forwarded 12 wouldn't be same. 14 924. MR. WARD: (Jases the first question that this raises in my mind, not server worked for Chris. She was it have at the same. 13 MR. WARD: Asker is the same. 19 S. R. Schlacht - 163 14 MR. WARD: MR.WARD: Asker is the same. 19			2	000	
5 910. O., But you were at Portugal and you saw the security though? 5 THE DEPONENT: The reseller for 8 6 MR, WARD:, for Chris to read it. 7 THE DEPONENT: The reseller for 8 7 A. I did; yes. 9 10 A. I did; yes. 9 10 A. I early yes. 9 10 A. I did; yes. 9 11 didn't even see the families and if the time so 1 10 12 wouldn't be able to rawser that. I was either in my 13 how the security for their 9 14 912. 0. Okay. Tab 17 plezes. Loon't think 15 that have a spreadsmeet attachment to 17. Are we 10 oking at the same 16 by MR. WARD: Okay. 11 17 MS. DOSANUH: Anwaitsory. 1 18 thinkNo, we'to ore anead of you. 19 Seventeen. 20 Okay. There's a spreadsheet 21 MS. DOSANUH: The senait for MS. DOSANUH: There. 22 The DEPONENT: Tokay. 23 The DEPONENT: Tokay. 24 MR. WARD: Sory, its he won't get to the attachment. It's one the email that Imitresers in 24 MS. DOSANUH: There. 29 14. MR. WARD: Sory, it's he won't get to the attachment. It's more the email that If it meresend in <td></td> <td></td> <td></td> <td>922.</td> <td></td>				922.	
6 the security hough? 6 923. MR, WARD:	4				to Stephanie Intending to
7 A. 1 did, yes. 7 THE DEPONENT: The reseller for 8 911. Q. Right and it was security for their 8 Portugal, that was her assistant. And she 9 1 dich therean see in the amiles half like times o.l 9 asked me to forward. Lik she sent me an email and 10 A. I was so busy organizing the event I 10 asked me to forward. Lik she sent me an email and 11 dich therean see in the mesole in the seole in th				002	
8 911. Q. Right and it was security for their 9 9 families as well? 9 10 A. I was so busy organizing the event I 10 11 didn't even see the families fail the time so I 10 11 didn't even see the families fail the time so I 11 to never to Chris. 12 wouldn't be able to answer that. I was either in my hotel room prepping or in a conterence. 11 to loward it. So, I simply just forwarded 13 to loward it. So, I simply just forwarded 12 to loward it. So, I simply just forwarded 14 912. Q. Cay. Tab 17 please. I don't thrik the same 12 14 924. MR. WARD: Okay. 16 binding at the same 17 MS. DOSANUH: An.wait.sorry. I 18 first question that this raises in my mind, not this you never worked for Chris. 12 There's a spreadsheet 10 accomention				923.	
9 families as well? 9 asked me to forwarddid she even sem it it or me to shad here to forwarddid she even sem it it or me to forwarddid she even sem it it is or me to forwarddid she even sem it it is or me to forwarddid she even sem it it is or me to forwarddid she even sem it it is or me to forwarddid she even sem it it is or for forms simith? 10 A. MR. WARD: 913. MR. WARD: MRW	8				
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Sheet 47	Page 166		. Page	168	- 50
2 929. 3 befc 5 infor 6 wou 7 930. 8 wha 9 Man 10 it wa 12 yes. 13 that 14 forw 15 forw 16 931. 17 correct 18 wass 19 20 20 pass 21 read 22 Unle 23 know 24 I just	S. R. Schlacht - 166 ted, or Stellar Point, I worked for them. Q. Okay. A. But I was a liaison. Like I said re, I would have to reach out to Chris for mation to pass on. Or Raj might know it. Or I d get it through Brea. Q. So, whatso, as a liaison then, how would you address the concerns that uela is raising in her email of July 25? A. I simply just forwarded it. Unless s in my scope of my knowledge, like this, .just forwardas I said, "this is an email was sent to me by Manuela with a request to ard it to you, regards Stephanie." So, I just arded it. Q. But in addition to thatam I ct that you read it and you determined that it 't within your scope of knowledge? A. If she was saying she wanted me to it to Chris, I don't even think I would have it, because that's not any of my business. ss Chris asked me to read it, which heI don't . I can tell by the way that I wrote this that simply forwarded it on. And mind you, this	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 10 11 12 13 14 15 16 7 8 9 20 21 22 23 24 5 5 6 7	 937. 938. 939. 940. 941. 	A. But it would have be but like I said, because Tara ha the issues going on with her da Q. Okay. And did yo Manuela the concerns that she A. No, I would have sai it along to Chris, he'll better ans question. I wasn'tI was really and I'm assuming I wouldn't ha to pass on. Q. Okay. Did you ap complaints to Chris went to cus everyday people calling to mak A. I don't know. I didn't attachment. I just simply forwal Q. So, your evidence read it, you just forwarded it on A. That's correct. Q. The next tab then 26, 2012 now. We've talked ab in terms of organizing conventio	e een mostly Tara, ad left because of d, I was thrown in. u discuss with 's raised in the email? d that I'll pass swer your new with working ve had the knowledge preciate that her tomer delays and e complaints? read the rded it to Chris. is that you didn't to Chris? s tab 18. July out your involvement
Page 167 1 neve 2 932. 3 4 933. 5 pass 6 7 she 8 it on 9 Step 10 11 12 13 14 15 16 17 934. 18 19 BY MR. W 20 935. 21 2012 23 she v	n my first two months and I wasn'tI S. R. Schlacht - 167 rI didn't have an established role. Q. Right. A. At this time. Q. In fairness she is not asking you to this on to Chris, though? A. Yes, she did. She sent it to me and addressed, "Good afternoon, Chris." So I passed Chris. It doesn't say "Good afternoon, nanie." MS. DOSANJH: I think her email at the top says that it's an email was sent with a request to forward it to you. So, there may be another email out there or something lingering where Manuela may have written to Stephanie indicating that an email needs to be forward. MR. WARD: Okay. ARD: Q. So, did you deal then in July of with Manuela? A. She was, like I previously stated, ras the assistant to the reseller at Portugal. ou know how it works with an assistant. Q. Right.	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	 942. 943. 944. 945. 945. 946. 947. 948. 	tracked expenses in respect of A. Yes, that's correct. Q. And so, is this you prepare the expense report that this production behind the pully A. Let me just readso so many years, that I need to re	conventions? urdid you t we see as part of tab? orry it's been ead before I answer. e. ould have or it could have been nail, it would hed a copy of n't say I've expenses I prepared. that. en so many

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	Sheet 44 Page 170		Page 172
	S. R. Schlacht - 170		S. R. Schlacht - 172
1	due to the fact that this was the first convention	1	able to give you any information to do with that
2	and I wasn't responsible for it, it could have been	2	amount.
23	Tara, because Tara did continue to work for a few	3	959. Q. Okay.
	after the convention.		A. Norand I can 100 percent say I
L L	949. Q. Okay. But, I mean the one thing		didn't see a bank transfer.
4 5 6 7	that we can agree on in that you had it would		
	that we can agree on is that you hadit would		
0	appear from the email exchange that you had this		A. No, I didn't have access to bank
8	expense report from Portugal on July 26, when you	8	accounts so there was no way I would have seen or
9	forwarded it to Chris?	9	done a bank transfer.
10	A. That's what the email suggests, yes.	10	961. Q. In respect of Portugal?
11	950. Q. Okay. And just looking atand I'm	11	A. In respect to anything.
12	not going to spend any more time on it than this.	12	962. Q. If someone gave you bank transfer
13	There are some credit card expenses incurred on July	13	information for the purposes of preparing expense
14	17 in relation to, it says in brackets, "Raj".	14	report then that's a way in which you might have
15	A. M'hmm.	15	seen one. Correct?
16	951. Q. And there's a \$16,000 amount.	16	A. Mostly the expenses were done with
17	A. Yes, I honestly wouldn't be able to	17	things paid on credit cards orI might see the
18	answer. I don't know.	18	confirmation of a bank transfer but I was never
19	952. Q. In the course of let's deal with	19	privy to
20	it more generally then. In the course of preparing	20	963. Q. I understand.
21	conference expense reports.	21	Ayou know what I mean.
22	A. M'hmm.	22	964. Q. You wouldn't initiate the bank
23	953. Q. Would you review credit card	23	transfer
24	statements? Presumably you would. I don't know	24	A. No.
25	where you get the information	24	
120			
	Page 171		Page 173
1	Page 171 S. R. Schlacht - 171		Page 173 S. R. Schlacht - 173
1	S. R. Schlacht - 171 A. Not statements, receipts.	1	S. R. Schlacht - 173 in respect to a bank transfer?
1 2	A. Not statements, receipts. 954. Q. Receipts?	1	S. R. Schlacht - 173 in respect to a bank transfer? A. Yes.
1 2 3	A. Not statements, receipts. 954. Q. Receipts? A. Yes.	1 2 3	S. R. Schlacht - 173 in respect to a bank transfer? A. Yes. 966. Q. And similarly, and presumably you
1 2 3 4	A. Not statements, receipts. 954. Q. Receipts? A. Yes. 955. Q. Okay.	1 2 3 4	S. R. Schlacht - 173 in respect to a bank transfer? A. Yes. 966. Q. And similarly, and presumably you would have had receipts when youfor the purpose
1 2 3 4 5	A. Not statements, receipts. 954. Q. Receipts? A. Yes. 955. Q. Okay. A. But I was so fresh working with the	1 2 3 4 5	S. R. Schlacht - 173 in respect to a bank transfer? A. Yes. 966. Q. And similarly, and presumably you would have had receipts when youfor the purpose of accounting
1 2 3 4 5 6	Page 171 S. R. Schlacht - 171 A. Not statements, receipts. 954. Q. Receipts? A. Yes. 955. Q. Okay. A. But I was so fresh working with the company that I wouldn't haveI can almost say that	1 2 3 4 5 6	S. R. Schlacht - 173 in respect to a bank transfer? A. Yes. 966. Q. And similarly, and presumably you would have had receipts when youfor the purpose of accounting A. Yes.
1 2 3 4 5 6 7	Page 171 S. R. Schlacht - 171 A. Not statements, receipts. 954. Q. Receipts? A. Yes. 955. Q. Okay. A. But I was so fresh working with the company that I wouldn't haveI can almost say that I don't even think I prepared this, but I may have.	1 2 3 4 5 6 7	S. R. Schlacht - 173 in respect to a bank transfer? A. Yes. 966. Q. And similarly, and presumably you would have had receipts when youfor the purpose of accounting A. Yes. 967. Qfor a convention at the end of
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1 2 3 4 5 6 7 8 9	Page 171 S. R. Schlacht - 171 A. Not statements, receipts. 954. Q. Receipts? A. Yes. 955. Q. Okay. A. But I was so fresh working with the company that I wouldn't haveI can almost say that I don't even think I prepared this, but I may have. But I wouldn't haveI don't know. I wouldn't be able to tell you what these were for.	1 2 3 4 5 6 7 8 9	 Page 173 S. R. Schlacht - 173 in respect to a bank transfer? A. Yes. 966. Q. And similarly, and presumably you would have had receipts when youfor the purpose of accounting A. Yes. 967. Qfor a convention at the end of it? A. Yes.
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1 2 3 4 5 6 7 8 9 10 11 12 13	Page 171 S. R. Schlacht - 171 A. Not statements, receipts. 954. Q. Receipts? A. Yes. 955. Q. Okay. A. But I was so fresh working with the company that I wouldn't haveI can almost say that I don't even think I prepared this, but I may have. But I wouldn't haveI don't know. I wouldn't be able to tell you what these were for. 956. Q. But it's fair to say that generally in tracking expenses in respect of conferences, you would review receipts? A. Not always. I can't say that it was	1 2 3 4 5 6 7 8 9 10 11 12 13	 Page 173 S. R. Schlacht - 173 in respect to a bank transfer? A. Yes. 966. Q. And similarly, and presumably you would have had receipts when youfor the purpose of accounting A. Yes. 967. Qfor a convention at the end of it? A. Yes. 968. Q. And similarly, I would think that you would have had credit card statements in relation to conferences? A. No, because that would be
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1 2 3 4 5 6 7 8 9 10 11 2 13 14 15 16 17	Page 171 S. R. Schlacht - 171 A. Not statements, receipts. 954. Q. Receipts? A. Yes. 955. Q. Okay. A. But I was so fresh working with the company that I wouldn't haveI can almost say that I don't even think I prepared this, but I may have. But I wouldn't haveI don't know. I wouldn't be able to tell you what these were for. 956. Q. But it's fair to say that generally in tracking expenses in respect of conferences, you would review receipts? A. Not always. I can't say that it was each time 100 percent. 957. Q. And similarly, you would review relevant bank transfers. Bank transfers relevant to the convention?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Page 173 S. R. Schlacht - 173 in respect to a bank transfer? A. Yes. 966. Q. And similarly, and presumably you would have had receipts when youfor the purpose of accounting A. Yes. 967. Qfor a convention at the end of it? A. Yes. 968. Q. And similarly, I would think that you would have had credit card statements in relation to conferences? A. No, because that would be accounting. I just collected the receipts and handed them off. 969. Q. So, references, for example, to the cash line items in this Portugal business expense
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	Sheet 45 Page 174	I	Page 176
	S. R. Schlacht - 174		S. R. Schlacht - 176
1	were involved in organizing on and reporting on. To	1	981. Q. Okay. And it's meant to give them
2	the extent that cash was expended, how would you	2	information on what?
3	know or account for that?	3	A. Sorry? I'm tired, could you repeat
			that corry?
4	A. Notyou know whatcash wasn't	4	that, sorry?
5	really used, because when I'm booking hotels and	5	982. Q. We're almost done for the day. The
6	that, it's credit card. So, I don't know why	6	blogs are meant for the affiliates and it's meant to
7	they'resome countries are different. Some	7	provide them with what? Instructions,
8	countries are weird and they like tolike you	8	information
9	knowhowI don't know if you've travelled to	9	A. Blogs are like
10	many countries. But most of the things I dealt	10	983. Qnotices, what was
111	with, with the other conventions, to my knowledge	111	Aa feel good read.
12	and recollection were mostly credit card charges.	12	984. Q. Okay. And what do you mean by that,
13	972. Q. Okay, thank you. Okay, at tab	13	"a feel good read"?
14	A. Unless it was like a coffee or	14	A. Just, I meanthere could be
15		15	
	something.		updates in a blog, but a blog is just like ait's
16	973. Q. Thank you. Tab 19. Email from	16	kind of like a diary. It's like a feel good read.
17	yourself to Chris Smith, July 30, 2012.	17	985. Q. Okay.
18	A. Oh yes, I did do blogging.	18	A. You know.
19	974. Q. The subject: "Post Portugal blog."	19	986. Q. So, the affiliates would read the
20	A. Yes.	20	blog that, for instance, the one that you wrote, and
21	975. Q. S,o my question, and I've think you	21	then they would feel good about the business? Is
22	just answered it.	22	that the intention?
23	A. I changed my mind about what I said	23	A. I don'tI couldn'tI don't know.
24	before, about the blogging.	24	Are you talking about this blog posting in
25	976. Q. Did you do blogging in relation to	25	particular, or in general?
		11	
	Page 175		
	Page 175 S. R. Schlacht - 175	P	Page 177
1	S. R. Schlacht - 175	P	Page 177 S. R. Schlacht - 177
1	S. R. Schlacht - 175 Banners Broker?	1	S. R. Schlacht - 177 987. Q. In general.
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1 2 3 4	S. R. Schlacht - 175 Banners Broker? A. Initially, yes. Not when I wentI did a few blogshere, sorry, I gotta get my bearings. That was two years ago.	1 2 3 4	S. R. Schlacht - 177 987. Q. In general. A. It's hardpeople write blogs for different things, right. I can only speak to the one that I personally wrote.
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1 2 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 10 11 12 11 12 14 5 16 17 10 10 11 11 11 11 11 11 11 11 11 11 11	S. R. Schlacht - 175 Banners Broker? A. Initially, yes. Not when I wentI did a few blogshere, sorry, I gotta get my bearings. That was two years ago. 977. Q. Okay. A. I was asked to do a few blogs after Portugal. This is the one that went up. And then when I went to go open offices, and if I attended an affiliate webinar, I was asked to make notes and then the notes would be sent over and a blog would be written. But that was only in the very beginning. 978. Q. Okay. So, talking about that period in the beginning. JustI want toI don't have a blog and I don't use a blog. And I'm not familiar with blogs. So, describe for me the Portugal Banners Broker blog. For example, who was it meant for, where would one see it? A. Blog	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 S. R. Schlacht - 177 987. Q. In general. A. It's hardpeople write blogs for different things, right. I can only speak to the one that I personally wrote. 988. Q. Okay. A. And this is the blog that you personally wrote that we see behind the production, tab 19? A. I can't be certain if I wrote it all on my own but I did have a part in putting it together, yes. 989. Q. Okay. A. It's basically just a summary of what went on in that week. 990. Q. You say in the cover email, "Your quote that I took from the recording is highlighted in green." Does that refresh your memory in terms of whether or not you wrote this blog? A. I don't see the green. Do you guys
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 21 3 4 5 16 7 8 9 10 11 23 4 5 16 7 8 9 10 11 23 4 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 12 13 14 5 16 7 10 11 12 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	S. R. Schlacht - 175 Banners Broker? A. Initially, yes. Not when I wentI did a few blogshere, sorry, I gotta get my bearings. That was two years ago. 977. Q. Okay. A. I was asked to do a few blogs after Portugal. This is the one that went up. And then when I went to go open offices, and if I attended an affiliate webinar, I was asked to make notes and then the notes would be sent over and a blog would be written. But that was only in the very beginning. 978. Q. Okay. So, talking about that period in the beginning. JustI want toI don't have a blog and I don't use a blog. And I'm not familiar with blogs. So, describe for me the Portugal Banners Broker blog. For example, who was it meant for, where would one see it? A. Blog 979. Q. What did you do to write it? A. A blog is an online presence. So	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 S. R. Schlacht - 177 987. Q. In general. A. It's hardpeople write blogs for different things, right. I can only speak to the one that I personally wrote. 988. Q. Okay. A. And this is the blog that you personally wrote that we see behind the production, tab 19? A. I can't be certain if I wrote it all on my own but I did have a part in putting it together, yes. 989. Q. Okay. A. It's basically just a summary of what went on in that week. 990. Q. You say in the cover email, "Your quote that I took from the recording is highlighted in green." Does that refresh your memory in terms of whether or not you wrote this blog? A. I don't see the green. Do you guys know? MS. DOSANJH: Well maybe it's this one.
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 16 7 8 9 10 11 12 3 4 5 16 7 8 9 20 11 12 3 4 5 16 7 8 9 20 11 12 3 14 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 3 14 5 16 17 10 11 12 3 14 5 16 17 10 11 11 12 11 11 11 11 11 11 11 11 11 11	S. R. Schlacht - 175 Banners Broker? A. Initially, yes. Not when I wentI did a few blogshere, sorry, I gotta get my bearings. That was two years ago. 977. Q. Okay. A. I was asked to do a few blogs after Portugal. This is the one that went up. And then when I went to go open offices, and if I attended an affiliate webinar, I was asked to make notes and then the notes would be sent over and a blog would be written. But that was only in the very beginning. 978. Q. Okay. So, talking about that period in the beginning. JustI want toI don't have a blog and I don't use a blog. And I'm not familiar with blogs. So, describe for me the Portugal Banners Broker blog. For example, who was it meant for, where would one see it? A. Blog 979. Q. What did you do to write it? A. A blog is an online presence. So it's meant for like the affiliates.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 S. R. Schlacht - 177 987. Q. In general. A. It's hardpeople write blogs for different things, right. I can only speak to the one that I personally wrote. 988. Q. Okay. A. And this is the blog that you personally wrote that we see behind the production, tab 19? A. I can't be certain if I wrote it all on my own but I did have a part in putting it together, yes. 989. Q. Okay. A. It's basically just a summary of what went on in that week. 990. Q. You say in the cover email, "Your quote that I took from the recording is highlighted in green." Does that refresh your memory in terms of whether or not you wrote this blog? A. I don't see the green. Do you guys know? MS. DOSANJH: Well maybe it's this one. Maybe it's the quote at the bottom of the
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 2 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1	S. R. Schlacht - 175 Banners Broker? A. Initially, yes. Not when I wentI did a few blogshere, sorry, I gotta get my bearings. That was two years ago. 977. Q. Okay. A. I was asked to do a few blogs after Portugal. This is the one that went up. And then when I went to go open offices, and if I attended an affiliate webinar, I was asked to make notes and then the notes would be sent over and a blog would be written. But that was only in the very beginning. 978. Q. Okay. So, talking about that period in the beginning. JustI want toI don't have a blog and I don't use a blog. And I'm not familiar with blogs. So, describe for me the Portugal Banners Broker blog. For example, who was it meant for, where would one see it? A. Blog 979. Q. What did you do to write it? A. A blog is an online presence. So	$ \begin{array}{c} 1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\end{array} $	 S. R. Schlacht - 177 987. Q. In general. A. It's hardpeople write blogs for different things, right. I can only speak to the one that I personally wrote. 988. Q. Okay. A. And this is the blog that you personally wrote that we see behind the production, tab 19? A. I can't be certain if I wrote it all on my own but I did have a part in putting it together, yes. 989. Q. Okay. A. It's basically just a summary of what went on in that week. 990. Q. You say in the cover email, "Your quote that I took from the recording is highlighted in green." Does that refresh your memory in terms of whether or not you wrote this blog? A. I don't see the green. Do you guys know? MS. DOSANJH: Well maybe it's this one. Maybe it's the quote at the bottom of the
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 2 21 2 21 2 2 2 2 2 2 2 2 2 2 2 2	S. R. Schlacht - 175 Banners Broker? A. Initially, yes. Not when I wentI did a few blogshere, sorry, I gotta get my bearings. That was two years ago. 977. Q. Okay. A. I was asked to do a few blogs after Portugal. This is the one that went up. And then when I went to go open offices, and if I attended an affiliate webinar, I was asked to make notes and then the notes would be sent over and a blog would be written. But that was only in the very beginning. 978. Q. Okay. So, talking about that period in the beginning. JustI want toI don't have a blog and I don't use a blog. And I'm not familiar with blogs. So, describe for me the Portugal Banners Broker blog. For example, who was it meant for, where would one see it? A. Blog 979. Q. What did you do to write it? A. A blog is an online presence. So it's meant for like the affiliates. 980. Q. Okay.	$ \begin{array}{c} 1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\end{array} $	 S. R. Schlacht - 177 987. Q. In general. A. It's hardpeople write blogs for different things, right. I can only speak to the one that I personally wrote. 988. Q. Okay. A. And this is the blog that you personally wrote that we see behind the production, tab 19? A. I can't be certain if I wrote it all on my own but I did have a part in putting it together, yes. 989. Q. Okay. A. It's basically just a summary of what went on in that week. 990. Q. You say in the cover email, "Your quote that I took from the recording is highlighted in green." Does that refresh your memory in terms of whether or not you wrote this blog? A. I don't see the green. Do you guys know? MS. DOSANJH: Well maybe it's this one. Maybe it's the quote at the bottom of the

	Sheet 46 Page 178		Page 180	
<u> </u>	S. R. Schlacht - 178		2	S. R. Schlacht - 180
4		1		that if you were writing this, would you
	THE DEPONENT: I tookit says, "In			that if you were writing this, would you
2	closing Chris Smith, CEO, states" and	23		sign it as "Stephanie" or would you sign it
3	then it has a paragraph.	3		as "BB Management"?
4	991. MR. WARD: Říght.			THE DEPONĚNT: Nothing's ever
5	THE DEPONENT: So, that's what I was	4 5		signedlike I wouldn't sign anything.
6	referring to.	6		MS. DOSANJH: So, who wasI guess, I
7		7		don't knowDavid, tell me if I'm over
8	BY MR. WARD:	8		working here.
9	992. Q. So, can we agree then that you wrote	9	1000.	MR. WARD: Yes, this is helpful, and I
10	this blog?	110	10001	want to wrap as well, so this is helpful.
11	A. I can't say that. I may have put it			MS. DOSANJH: So, BB Management is
12	together, but I may have had someone helping me.	12		comprised of, I don't know, four people,
13	It's been two years.	13		six people, or eight people that you guys
14	993. Q. But you can'tbut sitting	14		sit together once a month and you guys get
15	hereif there was anyone else that you recall	15		little notes and scripts from everyone and
16	helped with you it, I would like to know who that	16		put it together as a management team?
		17		THE DEPONENT: Well it would be
17	person was?			
18	A. It probably could have been Tara.	18		MS. DOSANJH: Or is it you that takes
19	994. Q. Not could have been. But	19		the lead on this and just signs off as "BB
20	A. I don't remember.	20		Management"?
21	995. Q. Butbecause I'm putting it to you,	21		THE DEPONENT: It would be on
22	Stephanie, in fairness, based on my reading of the	22		behalflike Chris Smith didn't write his
23		23		own blogs.
	email, that you wrote this blog yourself and that		1001	
24	there was nobody else that co authored. Is that not	24	1001.	MR. WARD: I appreciate that.
25	fair?	25		THE DEPONENT: It would be on behalf of
I	Page 179		Page 181	
	S. R. Schlacht - 179			S. R. Schlacht - 181
1	A. I can't really honestly answer that.	1		things that he wanted me to project.
2	I could have done theI could have written and had			
		2	BY MR. W	
3	someone helped me write it and then I made it flow.			
4	But honestly, it was two years ago. I honestly	4	1002.	Q. Can we put it this way that to the
5	don't remember.	5		t that you either authored, or co authored
6	996. Q. Okay. But	6	Bann	ers Broker blogs
7	MS. DOSANJH: I don't know maybe it	7		A. It would have been just this one.
8	says it's signed as "BB Management," so I	8	1003.	Qit was standard practice for them
		9		signed off on as "BB Management"?
9	don't know, maybe ask her who's apart of BB	10		A tike Lead twould have to pull
10	management.	10		A. Like I said, I would have to pull
11	997. MR. WARD: Yes, I was just going to get	11	the b	log up and see. This is just the instructions
12	to that point.	12		given and I followed.
13		13	1004.	Q. I don't want to leave this until
				who was instructing you to write these blogs?
14	BY MR. WARD:	1114	we\	WID Was instructing you to write these blogs:
14 15	BY MR. WARD: 998 O Your Counsel has pointed out that	14	WeV	who was instructing you to write these blogs?
15	998. Q. Your Counsel has pointed out that	15	Your	sending it to Chris Smith. Was it Chris Smith
15 16	998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed	15 16	Your that i	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog?
15 16 17	998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed by BB Management.	15 16 17	Your that i	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog? A. Yes it was Chris Smith.
15 16 17 18	 998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed by BB Management. A. To the best of my knowledge, and I 	15 16 17 18	Your that in 1005.	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog? A. Yes it was Chris Smith. Q. Okay. And similarly it was Chris
15 16 17 18 19	 998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed by BB Management. A. To the best of my knowledge, and I would have to have the blog in front of me. I think 	15 16 17 18 19	Your that in 1005. Smith	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog? A. Yes it was Chris Smith. Q. Okay. And similarly it was Chris n that instructed you to sign off as "BB
15 16 17 18 19	 998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed by BB Management. A. To the best of my knowledge, and I would have to have the blog in front of me. I think 	15 16 17 18 19 20	Your that in 1005. Smith	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog? A. Yes it was Chris Smith. Q. Okay. And similarly it was Chris that instructed you to sign off as "BB agement"?
15 16 17 18 19 20	 998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed by BB Management. A. To the best of my knowledge, and I would have to have the blog in front of me, I think that they were all signed "BB Management." 	15 16 17 18 19 20	Your that in 1005. Smith Mana	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog? A. Yes it was Chris Smith. Q. Okay. And similarly it was Chris that instructed you to sign off as "BB agement"?
15 16 17 18 19 20 21	 998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed by BB Management. A. To the best of my knowledge, and I would have to have the blog in front of me, I think that they were all signed "BB Management." 999. Q. Okay. So, if you were preparing it, 	15 16 17 18 19 20 21	Your that in 1005. Smith Mana	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog? A. Yes it was Chris Smith. Q. Okay. And similarly it was Chris n that instructed you to sign off as "BB agement"? A. If I signed off "BB Management" that
15 16 17 18 19 20 21 22	 998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed by BB Management. A. To the best of my knowledge, and I would have to have the blog in front of me, I think that they were all signed "BB Management." 999. Q. Okay. So, if you were preparing it, or part of it, you would similarly sign it "BB 	15 16 17 18 19 20 21 22	Your that in 1005. Smith Mana would	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog? A. Yes it was Chris Smith. Q. Okay. And similarly it was Chris that instructed you to sign off as "BB agement"? A. If I signed off "BB Management" that d have been the instruction given to me.
15 16 17 18 19 20 21 22 23	 998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed by BB Management. A. To the best of my knowledge, and I would have to have the blog in front of me, I think that they were all signed "BB Management." 999. Q. Okay. So, if you were preparing it, or part of it, you would similarly sign it "BB Management"? 	15 16 17 18 19 20 21 22 23	Your that in 1005. Smith Mana would 1006.	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog? A. Yes it was Chris Smith. Q. Okay. And similarly it was Chris that instructed you to sign off as "BB agement"? A. If I signed off "BB Management" that d have been the instruction given to me. Q. Okay.
15 16 17 18 19 20 21 22	 998. Q. Your Counsel has pointed out that this blog entry appears to be end noted, or signed by BB Management. A. To the best of my knowledge, and I would have to have the blog in front of me, I think that they were all signed "BB Management." 999. Q. Okay. So, if you were preparing it, or part of it, you would similarly sign it "BB 	15 16 17 18 19 20 21 22	Your that in 1005. Smith Mana would 1006.	sending it to Chris Smith. Was it Chris Smith nstructed you to write this blog? A. Yes it was Chris Smith. Q. Okay. And similarly it was Chris that instructed you to sign off as "BB agement"? A. If I signed off "BB Management" that d have been the instruction given to me.

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	Sheet 47 Page 182	Page 184
1	S. R. Schlacht - 182 day. I think we'll adjourn this. MS. DOSANJH: Do you want toshould we	S. R. Schlacht
45	just. 1008. MR. WARD: Off the record.	2 3 4 REPORTER'S NOTE:
6	DISCUSSION OFF THE RECORD	 5 6 Please be advised that any undertakings, objections, 7 advisements and refusals are provided as a service to all c
8 9 10 11 12	1009. MR. WARD: So just to accompany today's transcript, Counsel and I have agreed to mark the document binder that I was referring to as Exhibit A for identification purposes.	 their guidance only, and do not purport to be legally bindi necessarily accurate and are not binding upon Victory Verba Reporting Services Inc. 11 12 13 14
13 14 15	EXHIBIT NO. A: Document binder 1010. MR. WARD: Thank you very much.	15I hereby certify the foregoing to be a true and accu16transcription of the above-noted proceedings held before me1729th DAY OF APRIL, 2015, and taken to the best of my skill,18ability and understanding.19
		20 21 22 23 Certified Correct:
		23 24 25 26 27
		27 28 29 30 Matthew Dixon Certified Verbatim Rep
	Page 183 S. R. Schlacht - 183	
1 2 3	INDEX OF EXHIBITS	
4 5 6	EXHIBIT PAGE NUMBER DESCRIPTION NUMBER	
7 8 9	A Document binder 182	

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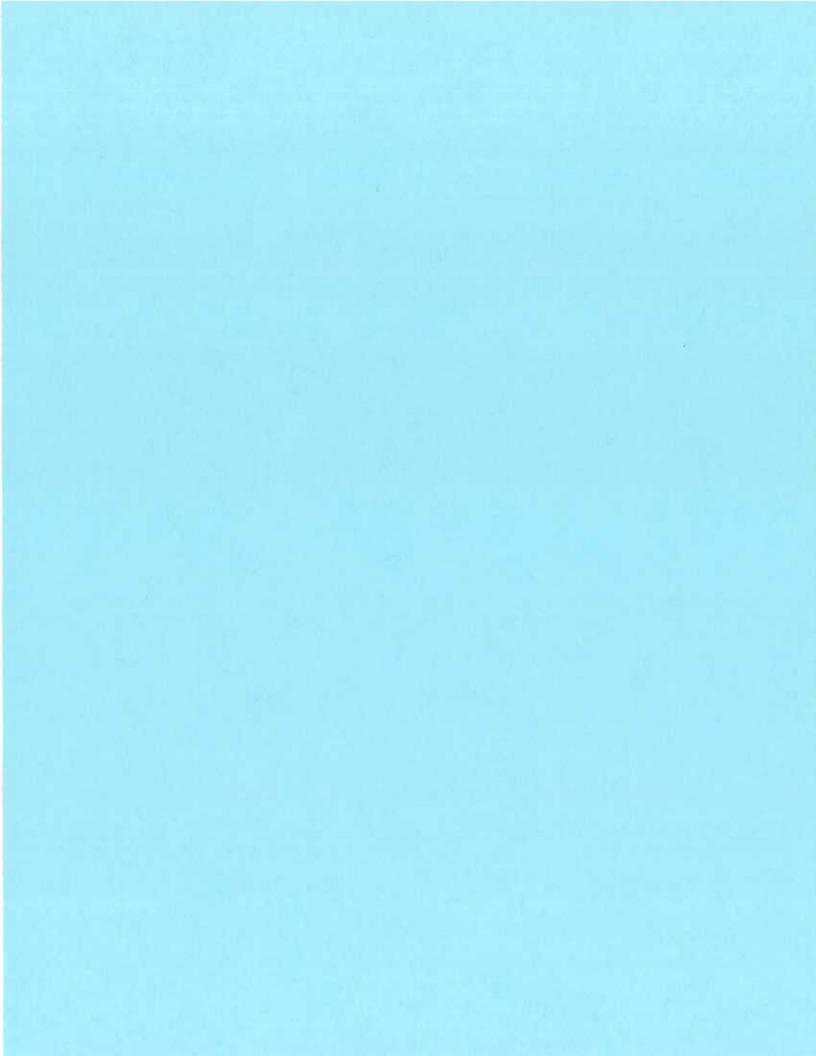
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Court File No. CV-14-10663-00 ONTARIO SUPERIOR COURT OF JUSTICE (Commercial List) IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1992, c. 27, s.2, AS AMENDED AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE ISLE OF MAN WITH RESPECT TO BANNERS BROKER INTERNATIONAL LIMITED APPLICATION OF MILES ANDREW BENHAM AND PAUL ROBERT APPLETON, IN THEIR CAPACITY AS JOINT LIQUIDATORS OF BANNERS BROKER INTERNATIONAL LIMITED, UNDER PART XIII OF THE BANKRUPTCY AND INSOLVENCY ACT (CROSS-BORDER INSOLVENCIES)

CC/am

This is the Continued Examination pursuant to the Bankruptcy and Insolvency Act of STEPHANIE ROSE SCHLACHT, taken at the offices of CASSELS BROCK & BLACKWELL, Suite 2100, Scotia Plaza, 40 King Street West, Toronto, Ontario, on the 11th day of June, 2015.

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APPEARANCES: DAVID WARD -- for the Receiver ERIN CRADDOCK GILLIAN GOLDBLATT JEREMY MARTIN KAREN DOSANJH -- for Stephanie R. SILVANA LOMBARDO (paralegal) Schlacht

ALSO PRESENT: Gillian Goldblatt

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Sheet 2 Page 2	Page 4
	S.R. Schlacht - 188
	2 talking about it.
	3 1018. Q. Sorry, Mr
S.R. Schlacht - 186	4 A. Tuck, T-U-C-K. 5 1019. Q. Okay. And who was he?
	6 A. He did, like, AV and computer work.
INDEX OF PROCEEDINGS	7 1020. Q. For who?
	A. For Chris Smith.
PAGE	9 1021. Q. Okay. So, did you understand him to 10 be a Banners Broker employee, or a Stellar Point
NUMBER	
	12 A. I never saw his pay stub, so I
	13 wouldn't be able to tell you. 14 1022. Q. But you worked at Stellar Point,
STEPHANIE R. SCHLACHT, resumed	15 correct?
Continued Examination by MR. WARD 187 - 414	16 A. Yes.
•	17 1023. Q. He
	18 A. He worked 19 1024. Qworked with you?
Index of Undertakings 416	20 A. When I first started off, as I
Certificate 417	21 explained last time, I started off at the Church
	22 Street address, and he was working there. I never 23 saw his pay stub, so I couldn't tell you if he was
	24 employed with Stellar Point or just straight with
	25 Chris.
Page 3 S.R. Schlacht - 187	Page 5 S.R. Schlacht - 189
1 STEPHANIE R. SCHLACHT, resumed	1 A. Q.And after you first started off,
2 CONTINUED EXAMINATION BY MR. WARD:	2 you moved to the Carlow property?
3 1011. Q. Stephanie, the last time that we	3 Å. So, we were in a small building at
 met, you had talked about aone of the things you told us about was a convention in Portugal 	4 1019 Nelson, as I told you last time. 5 1025. Q. So, was Mr. Tuck working with you in
6 A. That is correct.	6 the small building at 1019
7 1012. Qwhen your boss, at the time, who	7 A. No, he wasn't.
8 was Mr. Kuldip Josun, I believe 9 A. M'hmm.	8 1026. QNelson Street? 9 A. Strictly at Church.
10 1013. Qwas fired and asked to leave the	10 1027. Q. And where did you move after that?
11 convention?	11 A. Carlow Court.
12 A. M'hmm. 13 1014. Q. You need to say yes or no for the	12 1028. Q. Okay. And was Mr. Tuck working with 13 you at Carlow Court?
14 record, please.	14 A. No, he was not.
15 Å. Yes.	15 1029. Q. Okay. Who else told you about the
16 1015. Q. Okay. And you also indicated at the 17 time he was fired, he had been making threats to	16threats that you told me about?17A.A.That was two years ago.We would
18 management and staff?	18 talk amongst ourselves. I couldn't give you a name
19 Å. That is what I heard, yes.	19 without feeling confident
20 1016. Q. Okay. And who did you hear that 21 from?	20 1030. Q. Okay, and 21 Aother than Colin.
22 A. I couldn't tell you exactly.	22 1031. Q. And you used the word "threats".
23 Everyone was talking about, so a number of people.	23 Why did you believe them to be threats?
24 1017. Q. Okay. And, so, who were some of the	A. Because he was threatening families,
25 people that you	25 and he was angry, so he was making, you know, verbal

	Sheet 3 Page 6		Page 8	508
$\begin{array}{c}1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\\24\end{array}$	 S.R. Schlacht - 190 threats. 1032. Q. What sorts of verbal threats? A. To be honest, I couldn't remember the exact words. I don't know whether it was against families orI can't remember. 1033. Q. Okay A. I think it was against Chris Smith's family. 1034. Q. Okay. And I am not asking for the exact words, but if someone is threatening someone's family, I mean, it is significant enough that there may be something else you remember. Short of the exact words, can you tell me what that was? A. No. 1035. Q. Was he threateningto your knowledge, was Mr. Josin threatening anyone other than Chris Smith and his family? A. I am not sure. 1036. Q. So, I take it that would be a no? A. That would be a nowell, I am not sure. That is my answer. 1037. Q. And what do you A. I can't remember, sorry. 1038. Q. Is there anything else that you 	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	 S.R. Schlacht - 192 A. Well, Stellar Point as a company 1045. Q. Sorry, you just need to let me finish the question for the record. A. Okay, sorry. 1046. Q. So, can I take it, then, that it is your evidence that Grant D'Eall prepared the expen reibursement policy for Stellar Point? A. I couldn't be certain, but he did policies. So, that would be the person, I would think. But, like I said, I don't remember. 1047. Q. Well, who did you deal with in terms of expense reimbursement? A. Jeanette Kennedy. 1048. Q. Okay. And what did she do in relation to expense reimbursement? A. We gave our expenses to her, and that was it. 1049. Q. And when you say "we", we are just talking about yourself now, correct? Or was there someone else you are referring to? A. When I had expenses, I went through her, or I went through Raj directly, because I was the assistant. I could go straight to him if I needed to. 	se
$\begin{array}{c} 25 \\ 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 24 \\ 25 \end{array}$	remember about the circumstances of Mr. Josin's Page 7 S.R. Schlacht - 191 departure, apart from what you have told me today and when you were examined on April the 29th, 2015? A. No. 1039. Q. So, you are certain of that? A. I am certain, yes. 1040. Q. Okay. One of the other things that we talked about when we met in April was the Stellar Point expense reimbursement policy, and you told me that there was such a policy. A. Did I? 1041. Q. Do you recall that? A. About a reimbursement, like, for expenses? Yes. Yes, I do recall that. 1042. Q. Okay. And was that a policy in writing? A. I don't know. 1043. Q. Did you ever see a policy in writing? A. I don't remember. I don't think so, but there may have been, but Grant D'Eall, the one who did all the policies, would be the person you would want to talk to about that. 1044. Q. Okay. And when you say "all the policies", what other policies was Grant D'Eall involved	25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 23 24 25 23 24 25 23 24 25 23 24 25 25 25 25 25 25 25 25 25 25	 1050. Q. Okay. And if you went to Jeanette, Page 9 S.R. Schlacht - 193 what would you give her, and what would she do with it? I just need to understand from you, if I could, how the expense reimbursement policybecause yo used the word "policy", worked. A. Well, I don't know if "policy" is the right word. You would write your expenses in a spreadsheet, you would attach your receipts, and you would hand it over to the office manager. 1051. Q. Which was? A. Jeanette Kennedy 1052. Q. Okay. Ageneral manager, office manager, however you want to put it. 1053. Q. And thenwould you know what Jeanette Kennedy did with it? A. You would have to ask her. 1054. Q. Well, did she approve them and write you a cheque? A. I didn't have a whole lot of expenses. So, if I couldlike, if I am just referring to myself. It would either be out of petty cash or a cheque, but for me it wasn't, like, Rajif I was travelling with Raj or doing things, I was usually with a person that could take care of my expenses themselves.	u

	Sheet 4 Page 10		Page 12	5(
1 2 3 4 5 6 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	S.R. Schlacht - 194 1055. Q. Right. And am I correct that Jeanette reported to Mr. Dixit? A. You would have to ask her. 1056. Q. Okay. Did you see her reporting to anyone other than Mr. Dixit? A. You would have to ask her. 1057. Q. No, I am asking what you saw. A. My job was to be assistant to Rajiv Dixit. So, as far as I know, she only reported to Raj. But, like I said, you would have to ask her. 1058. Q. Okay. And as far as you knew, and know, the only person who approved expense reimbursement within Stellar Point was Mr. Dixit, as well? A. As far as I know, yes. 1059. Q. Okay. A. As far as I know, yes. 1059. Q. Okay. A. Approved them? Well, Jeanette could approve them based on guidelines. 1060. Q. Okay. So, what guidelines are you referring to? A. You would have to ask her on that. I wouldn't be able to list a set of guidelines for you. 1061. Q. But how is it that you know that A. It is	$\begin{array}{c}1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\3\\24\\25\end{array}$	S.R. Schlacht - 196 get one over to you, for sure. MS. DOSANJH: Yes? Okay. 1068. MR. WARD: Yes. BY MR. WARD: 1069. Q. Now, before we jump into this document, I would like you to have a look at the attachment, which is an independent contractor agreement? A. Yes. 1070. Q. And you should, as well, familiarize yourself with the cover e-mail, because I have a number of questions on this set of documents. A. Okay, yes, go ahead. MS. DOSANJH: Sorry, tab 21? 1071. MR. WARD: Okay. MS. DOSANJH: Tab 21, sorry? 1072. MR. WARD: So, have youyes, sorry, tab 21. BY MR. WARD: 1073. Q. Have you reviewed the cover e-mail and the independent contract agreement? A. I went through this binder. So, yes, I am familiar.	
$\begin{array}{c} 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\\ 24\\ 25\\ \end{array}$	 Page 11		Page 13 S.R. Schlacht - 197 1074. Q. Okay. So, looking at the e-mail on the bottom of page 1 A. M'hmm. 1075. Qfrom Mr. Dixit toit is addresed to ic@bannersbroker.com A. Yes. 1076. Qcopied to yourself. A. M'hmm. 1077. Q. Do you know what the IC would be? A. Independent contractors. 1078. Q. Okay. And then the e-mail from Raj goes on to ask you to proofread it, correcting spelling or grammatical errors, and then send it out to certain independent contractors? A. Yes, that is correct. 1079. Q. And did you do that? A. I was asked to do it, but I don't have the e-mail where I sent it out, so I can assume that I did. 1080. Q. Okay. And then look at the e-mail directly above that, on the top of the page. A. Okay, yes? 1081. Q. And halfway through that e-mail, it suggests to me that you also added some informatior to the contract?	n

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	Sheet 5 Page 14	-	Page 16
	S.R. Schlacht - 198		S.R. Schlacht - 200
1	A. "I notice upon reading there was	1 1	particular. I mean, clearly this was aI think
2	no place to sign"	2	hopefully that we can agree that thisyou have
3	Yes, all I added was line for them to sign, because	23	just told me that this was a Banners Broker
4	there was no place for the independent contractors		International contract
5	to sign at the end of the agreement.	5	A. Well, the independent contract
6	1082. Q. Okay.	4 5 6 7	
	A. So, all I added was a line with a		question. We can agree that Stellar Point is not a
8	signature required.	8	party to this contract?
9	1083. Q. And who were the parties to this	9	A. Stellar Point is the one that
10	contract?	10	handled all the administrative work for Banners
11	A. The parties, meaning who was it	11	Broker International. So, I dealt with the
12	being sent to?	12	independent contractors. So, anything that Banners
13	1084. Q. Who was the contract between?	13	Broker International wanted to give to the
14	A. It was between the independent	14	independent contractors, I was in charge of passing
15	contractors and Banners Broker International, it	15	along that information.
16	looks like.	16	1093. Q. Okay. And with respect to this
17	1085. Q. And when you say Banners Broker	17	particular contract, we can agree that you were also
18	International, you mean the Isle of Man entity?	18	in charge of editing the contract, adding the
19	A. Yes, that is what it says.	19	missing information and sending it to the
20	1086. Q. Okay. So, were you working for the	20	independent contractors on
21	Isle of Man entity at the time?	21	A. I wasn't
22	A. No, I was not.	22	1094. Q. Please let me finish the
23	1087. Q. So, how was it that you were	23	
24		23	questionon behalf of Banners Broker
24	reviewing and editing a contract between Banners Broker International, the Isle of Man entity, and	24	International. A. I worked for Stellar Point, so I
20	prover memanonal, me iste of wan entity, and	120	
	D 16		
	Page 15 C.D. Sobloobt 100		Page 17
1	S.R. Schlacht - 199		Page 17 S.R. Schlacht - 201
1	S.R. Schlacht - 199 independent contractors?	1	S.R. Schlacht - 201 don't know how I can answer that again. I was given
1	S.R. Schlacht - 199 independent contractors? A. Because like I explained last time,	1	S.R. Schlacht - 201 don't know how I can answer that again. I was given stuff from the client to review for grammatical
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	Sheet 6 Page 18 S.R. Schlacht - 202		Page 20 S.R. Schlacht - 204
1	them on forms of tickets and phone support as those	1	answer those questions, and they wouldn't come into
2	words are used in the independent contractor	2	the Stellar Point office.
3	agreement?	3	1104. Q. Because Stellar Point had trained
4	A. Well, the ticketing system phone	4	them on how to respond to affiliates, correct?
5	support was in place before I started. So, they	5	A. Well, they were trained by Stellar
6	were all well-versed in it. So, I didn'tother	6	Point, yes.
7	thanI didn't really give a formal training on	7	1105. Q. Right.
8	that, because they were already aware of how to do	8	A. By myself or by somebody else from
9	it.	9	Stellar Point.
10	1098. Q. Okay. And, so, the answer to that	10	1106. Q. Okay. And then secondly, just to
11	is no, you did not give formal training. What did	11	cover off this point, what did phone support consist
12	you train independent contractors on? Because we	12	of?
13	know that you travelled to a number of countries.	13	A. You call in with a question as
14	A. Yes.	14	opposed to writing in.
15	1099. Q. To meet with them? So, if you	15	1107. Q. Okay. So, who would be calling who?
16	didn't train them on forms of tickets and phone	16	A. Affiliates would be calling in to
17	support, what else	17	the support system to ask questions.
18	A. Well, I went over that.	18	1108. Q. And where was the support system?
19	1100. Q. Please let me finish the question.	19	A. Stellar Point had a ticketing and a
20	What aspects of customer service did you train the	20	support system, and then all of the independent
21	independent contractors on?	21	contractors opened up their own independent offices
22	A. Well, we would go upwell, you	22	where they took support questions and e-mails, as
23	know, I think maybe I need to change my answer,	23	well.
24	because we wouldif they had questions about the	24	1109. Q. Okay. And you personally trained
25	ticket support, I would answer them. But, like I	25	the independent contractors on that support, how to
	Page 19	ر	Page 21
	S.R. Schlacht - 203		S.R. Schlacht - 205
	said, most of them were well-versed on it, so they	1	use that support system?
2	didn't have a lot of questions about the ticketing	23	A. It was myself, other people. Grant
3	system.		did it at times. Sabi another assistant did it at
4	1101. Q. Okay.	4	times.
5	A. But if they did, of course, yes, I	5	1110. Q. Okay. So, the answer is, yes,
6	would be able to answer the question.	b 7	yourself and others?
7	1102. Q. Okay. So, what was ticket support?		A. Yes.
8	A. When an affiliate had a question,	8	1111. Q. Okay. The contract references on
9	they would either call in to support, or they would	9	the same page, five paragraphs down, that:
10	submit a support ticket.		"Banners Broker International will
11	1103. Q. And they would submitand I have	11	provide ongoing training and support to its
13	never seen a support ticket, and I wasn't there, so	12	independent contractors and their staff"
	I am going to ask you to describe for us what a		Is that reference to Banners Broker International
14	support ticket was and where they would submit it.	14	correct, or should that be Stellar Point? A. Well, this is an older contract.
116	A It an attiliate had a question they		
15	A. If an affiliate had a question, they would go on the Bappers Broker website. They could		
16	would go on the Banners Broker website. They could	16	So, we were hired by Banners Broker International to
16 17	would go on the Banners Broker website. They could either call in, or they could submit a support	16 17	So, we were hired by Banners Broker International to train. So, you would have to ask the person that
16 17 18	would go on the Banners Broker website. They could either call in, or they could submit a support ticket. A support ticket is a question that they	16 17 18	So, we were hired by Banners Broker International to train. So, you would have to ask the person that wrote this, but because we were contracted out to do
16 17 18 19	would go on the Banners Broker website. They could either call in, or they could submit a support ticket. A support ticket is a question that they have, like if you call Bell or if you call Rogers,	16 17 18 19	So, we were hired by Banners Broker International to train. So, you would have to ask the person that wrote this, but because we were contracted out to do supportbut this one here is referring to Banners
16 17 18 19 20	would go on the Banners Broker website. They could either call in, or they could submit a support ticket. A support ticket is a question that they have, like if you call Bell or if you call Rogers, you have a question, you can go on the website and	16 17 18 19 20	So, we were hired by Banners Broker International to train. So, you would have to ask the person that wrote this, but because we were contracted out to do supportbut this one here is referring to Banners Broker International, but not Banners Broker
16 17 18 19 20 21	would go on the Banners Broker website. They could either call in, or they could submit a support ticket. A support ticket is a question that they have, like if you call Bell or if you call Rogers, you have a question, you can go on the website and write in a question and someone will answer, similar	16 17 18 19 20 21	So, we were hired by Banners Broker International to train. So, you would have to ask the person that wrote this, but because we were contracted out to do supportbut this one here is referring to Banners Broker International, but not Banners Broker Limited.
16 17 18 19 20 21 22	would go on the Banners Broker website. They could either call in, or they could submit a support ticket. A support ticket is a question that they have, like if you call Bell or if you call Rogers, you have a question, you can go on the website and write in a question and someone will answer, similar to that. The independent contractors were being	16 17 18 19 20 21 22	So, we were hired by Banners Broker International to train. So, you would have to ask the person that wrote this, but because we were contracted out to do supportbut this one here is referring to Banners Broker International, but not Banners Broker Limited. 1112. Q. So, in practice, what you are
16 17 18 19 20 21 22 23	would go on the Banners Broker website. They could either call in, or they could submit a support ticket. A support ticket is a question that they have, like if you call Bell or if you call Rogers, you have a question, you can go on the website and write in a question and someone will answer, similar to that. The independent contractors were being trained, because anybody that wrote in from a	16 17 18 19 20 21 22 23	 So, we were hired by Banners Broker International to train. So, you would have to ask the person that wrote this, but because we were contracted out to do supportbut this one here is referring to Banners Broker International, but not Banners Broker Limited. 1112. Q. So, in practice, what you are telling me, then, is that it was Stellar Point or
16 17 18 19 20 21 22	would go on the Banners Broker website. They could either call in, or they could submit a support ticket. A support ticket is a question that they have, like if you call Bell or if you call Rogers, you have a question, you can go on the website and write in a question and someone will answer, similar to that. The independent contractors were being	16 17 18 19 20 21 22	So, we were hired by Banners Broker International to train. So, you would have to ask the person that wrote this, but because we were contracted out to do supportbut this one here is referring to Banners Broker International, but not Banners Broker Limited. 1112. Q. So, in practice, what you are

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	Sheet 7 Page 22		Page 24
	S.R. Schlacht - 206		S.R. Schlacht - 208
1	A. Yes.	1	remember the exact amount. I think it
2	1113. Qthat provided the ongoing support	2	wasactually, I can't remember, so I couldn't tell
23	and training to the independent contractors on	23	you. But GCube Media is where independent
4	behalf of Banners Broker International?	4 5	contractors sent their fees to.
5 6 7	A. While I was working there, correct.	5	1122. Q. Okay. And, so, in the course of
6	1114. Q. And in fact, that was primarily what	6	your responsibilities having to do with the
7	you were involved in doing?	7	independent contractors, you would tell them where
8	A. I was involved with that, as well	8	to send their fees?
9	asI was Rajiv Dixit's personal assistant, as	9	A. I would take instructions from Chris
10	well.	10	Smith, and then I would pass it along to the
11	1115. Q. Okay. So, on to the next tab, 22.	11	independent contractors.
12	A. M'hmm.	12	1123. Q. And was Mr. Dixit involved in where
13	1116. Q. You told me a number of times that	13	thelet me finish the question, where the
14	you were Rajiv Dixit's personal assistant. We do	14	independent contractors would send their money?
15	see a lot of e-mails from Chris Smith directly to	15	A. Not that I can recall. When it came
16	yourself	16	to money, I dealt directly with Chris Smith, when it
17	A. Yes.	17	came to Banners Broker International.
18	1117. Qhaving to do with particularly	18	1124. Q. And when it came to money on the
19	wire transfers.	19	
		13	Banners Broker Limited side, I take it you dealt
20	A. That is correct.	20	with Rajiv Dixit?
21	1118. Q. And this is an example. What were	21	A. Jeanette Kennedy did more of the
22	your responsibilities in relation to Mr. Smith for	22	financials. I didn't really touch any financial
21 22 23	the processing of wire transfers?	22	aspects.
24	A. Like I told you last time at the	24	1125. Q. Jeanette Kennedy did more of the
25	questioning, if we refer to the transcript, I dealt	25	financials than Mr. Dixit or than yourself?
1 40			
-			
-	Page 23		Page 25
-			
-	Page 23 S.R. Schlacht - 207		Page 25 S.R. Schlacht - 209
1	S.R. Schlacht - 207 with the independent contractors, and there were a	1	Bage 25S.R. Schlacht - 209 A. Like I said before in the previous
1 2	S.R. Schlacht - 207 with the independent contractors, and there were a lot of wires that went out for paying commissions.	1	A. Like I said before in the previous questioning in April, I didn't really have anything
1 2 3	S.R. Schlacht - 207 with the independent contractors, and there were a lot of wires that went out for paying commissions. So, I spoke with Mr. Smith directly on making sure	1 2 3	Rage 25 S.R. Schlacht - 209 A. Like I said before in the previous questioning in April, I didn't really have anything to do with financials. That wasn't in my scope of
1 2 3 4	S.R. Schlacht - 207 with the independent contractors, and there were a lot of wires that went out for paying commissions. So, I spoke with Mr. Smith directly on making sure that those wires went out. That was one of my jobs,	1 2 3	A. Like I said before in the previous questioning in April, I didn't really have anything to do with financials. That wasn't in my scope of employment. So, anything to do with that, you would
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	Sheet 8 Page 26		Page 28
	S.R. Schlacht - 210		S.R. Schlacht - 212
1	Banners Broker?	11 1	knowledge, this is a corporate sales agreement that
2	A. No, I was not. Chris Smith was	11 5	you passed along to Mr. Smith, and it came from Mr.
	A. NU, I Was NUL ONNS SINUT Was	23	Dixit?
3	always the face of Banners Broker. I was just an		
4	assistant.	4	A. I don't know. I passed it along to
5	1130. Q. Were you one of the faces of Banners	5	Chris, but
6	Broker?	6	1140. Q. Well, do you see the e-mail where
7	A. No, I was not.	7	Mr. Dixit sends it to yourself?
8	1131. Q. The next tab, 23, is another	8	A. Yes, it looks that way.
9	contract.	9	1141. Q. It is dated 7:37 a.m. on August
10	A. M'hmm.	10	17th, 2012?
11	1132. Q. A different one. This is what is	11	A. Yes.
12	called athis seems to be called a corporate sales	12	1142. Q. And then you just forward that along
13	agreement?	13	to Mr. Smith?
14	A. Yes.	14	
15	1133. Q. And, again, I don't seeand you	15	1143. Q. And were you involvedand I think
16	can take a look at it and tell me if I am wrong,	16	you have told us that you weren't, but it wasn't in
17	Stellar Point is being a party to the contract, but	17	response to a question that I had. So, let's
18	Stellar Point is identified as the person to contact	18	just
19	on behalf of Banners Broker International. So, they	19	A. Okay.
20	are identified in the contract as being the in the	20	1144. Qbe clear on it.
21	notice provision on page 2.	21	A. Sure.
22	A. I didn't write any of the contracts.	22	1145. Q. Did you have anything to do with
23	I justit looks here that I just sent it along.	23	editing or proofreading this particular contract?
24	So, I wouldn't be able to answer any questions in	24	A. No, I don't believe so.
25	regard to the verbiage in the contract.	25	1146. Q. Okay. The next tab, then, is tab
120		1.50	a share the non-constitution to the
	Dama 97		
	Page 27 S.R. Schlacht - 211		Page 29
	S.R. Schlacht - 211		Page 29 S.R. Schlacht - 213
1	S.R. Schlacht - 211 1134. Q. So, where did you send it from?	1	S.R. Schlacht - 213 24, and the subject line of this e-mail is, "Success
1 2	S.R. Schlacht - 211 1134. Q. So, where did you send it from? Where did you receive it from, and where did you	1	S.R. Schlacht - 213 24, and the subject line of this e-mail is, "Success Manual"?
1 2 3	S.R. Schlacht - 211 1134. Q. So, where did you send it from? Where did you receive it from, and where did you send it to?	1 2 3	S.R. Schlacht - 213 24, and the subject line of this e-mail is, "Success Manual"? A. Yes.
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 10 11 12 13 4 5 10 10 10 10 10 10 10 10 10 10 10 10 10	S.R. Schlacht - 211 1134. Q. So, where did you send it from? Where did you receive it from, and where did you send it to? A. This goes back toyes, I don't know. Like I said, I didn't write the contracts. You would have to askyes. 1135. Q. If you look at the cover e-mail, which is dated August 17th, 2012 A. Yes. 1136. Qthis is something that Mr. Dixit prepared, and asked you to send to Mr. Smith? A. Yes, I don't know. This was in the beginning part of my employment. I don't know. 1137. Q. We agree that you passed it along to Mr. Smith, and you need to A. It says: "Hi, Chris. Here is the corporate sales agreement" And I attached it. So, it looks as though I passed	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 16 7 18 9 10 11 12 3 4 5 10 10 10 10 10 10 10 10 10 10 10 10 10	 Page 29
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 10 11 12 11 11	S.R. Schlacht - 211 1134. Q. So, where did you send it from? Where did you receive it from, and where did you send it to? A. This goes back toyes, I don't know. Like I said, I didn't write the contracts. You would have to askyes. 1135. Q. If you look at the cover e-mail, which is dated August 17th, 2012 A. Yes. 1136. Qthis is something that Mr. Dixit prepared, and asked you to send to Mr. Smith? A. Yes, I don't know. This was in the beginning part of my employment. I don't know. 1137. Q. We agree that you passed it along to Mr. Smith, and you need to A. It says: "Hi, Chris. Here is the corporate sales agreement" And I attached it. So, it looks as though I passed it on.	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 14 5 6 7 8 9 0 11 12 13 14 5 6 7 8 9 0 11 12 13 14 5 6 7 8 9 0 11 12 13 14 5 15 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	 Page 29
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 2 12 11 12 10 11 12 11 11	S.R. Schlacht - 211 1134. Q. So, where did you send it from? Where did you receive it from, and where did you send it to? A. This goes back toyes, I don't know. Like I said, I didn't write the contracts. You would have to askyes. 1135. Q. If you look at the cover e-mail, which is dated August 17th, 2012 A. Yes. 1136. Qthis is something that Mr. Dixit prepared, and asked you to send to Mr. Smith? A. Yes, I don't know. This was in the beginning part of my employment. I don't know. 1137. Q. We agree that you passed it along to Mr. Smith, and you need to A. It says: "Hi, Chris. Here is the corporate sales agreement" And I attached it. So, it looks as though I passed it on. 1138. Q. Okay. A. But you would have to ask Chris	1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 23 14 5 6 7 8 9 20 11 23 14 5 6 7 8 9 20 11 23 14 5 6 7 8 9 20 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 11 23 11 2 11 2 11 2 11 2 11 2	 Page 29
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 20 11 12 23 4 5 6 7 8 9 20 11 12 23 14 5 6 7 8 9 10 11 22 23 14 5 15 10 10 10 10 10 10 10 10 10 10 10 10 10	S.R. Schlacht - 211 1134. Q. So, where did you send it from? Where did you receive it from, and where did you send it to? A. This goes back toyes, I don't know. Like I said, I didn't write the contracts. You would have to askyes. 1135. Q. If you look at the cover e-mail, which is dated August 17th, 2012 A. Yes. 1136. Qthis is something that Mr. Dixit prepared, and asked you to send to Mr. Smith? A. Yes, I don't know. This was in the beginning part of my employment. I don't know. 1137. Q. We agree that you passed it along to Mr. Smith, and you need to A. It says: "Hi, Chris. Here is the corporate sales agreement" And I attached it. So, it looks as though I passed it on. 1138. Q. Okay. A. But you would have to ask Chris	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 24 22 23 24 22 23 24 22 23 24 22 23 24 25 26 7 8 9 10 11 22 23 24 25 26 7 8 9 10 11 22 23 24 25 26 7 8 9 10 11 22 23 24 20 20 20 20 20 20 20 20 20 20 20 20 20	 Page 29 S.R. Schlacht - 213 24, and the subject line of this e-mail is, "Success Manual"? A. Yes. 1147. Q. So, take a minute, and if you could review the productionso, that would be the tab in the e-mail and the attachments? A. Yes, I am aware of what this is. 1148. Q. And then my question for you, as a general matter, is what were your responsibilities in relation to the success manual? A. I was asked just to edit it for grammatical, spelling and flow errors. And then also, I was beinglike, at this time, I was being trained on the program, Banners Broker program, so I just included some study questions that I had written. 1149. Q. Okay. So, who asked you to do this? A. To edit it? 1150. Q. To do whatever you just described. A. To edit the manual would have been Chris Smith. 1151. Q. And then you told me that you prepared some study questions. Who asked you to do what you did in relation to the success
$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\9\\20\\21\\22\\23\end{array}$	S.R. Schlacht - 211 1134. Q. So, where did you send it from? Where did you receive it from, and where did you send it to? A. This goes back toyes, I don't know. Like I said, I didn't write the contracts. You would have to askyes. 1135. Q. If you look at the cover e-mail, which is dated August 17th, 2012 A. Yes. 1136. Qthis is something that Mr. Dixit prepared, and asked you to send to Mr. Smith? A. Yes, I don't know. This was in the beginning part of my employment. I don't know. 1137. Q. We agree that you passed it along to Mr. Smith, and you need to A. It says: "Hi, Chris. Here is the corporate sales agreement" And I attached it. So, it looks as though I passed it on. 1138. Q. Okay. A. But you would have to ask Chris Smith or Rajiv Dixit for the particulars on this	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\9\\20\\21\\22\\23\end{array}$	 Page 29

Sheet 9 Page 30	Page 32 514
S.R. Schlacht - 214 1 go-getter individual. 2 1152. Q. Okay. 3 A. So, I did it on my own accord. 4 1153. Q. Soand stay on the first page. I 5 will let you know when we are going to move on. 6 A. Okay. 7 1154. Q. The e-mail says: 8 "Here is the edited BB manual. We are 9 in the process of creating a new training 10 manual" 11 A. M'hmm. 12 1155. Q. So, do I take it from that that as 13 at the time you wrote this e-mail, you were telling 14 Mr. Smith that you were in the process of creating a 15 new training manual? 16 A. No, "we" doesn't refer to me. It 17 refers to Stellar Point. Grant D'Eall was 18 responsible for writing manuals. 19 1156. Q. Okay. So, you are saying that "we" 20 doesn't include you at all. 21 A. No. 22 1157. Q. Is that what you are saying? 3 A. I did grammatical errors and 3 sentence flow. 25 1158. Q. Okay. So, "we" isaccording to	S.R. Schlacht - 216 the success manual that we see at tab 24 that you gave them? A. Grant D'Eall did an updated one, so I believe it was the updated one, the one I used when I actually travelled. This was back in August before I started travelling. 1164. Q. Okay. So, then, we can agree that a success manual and a training manual are the same thing? Because if there is another manual, I would like to know about it. A. I don'tthe only manual would be a trainingaffiliates themselves would write their own manuals, but that didn't come from Stellar Point or Banners Broker International. 1165. Q. Sorry, you said "affiliate"? I take it you meant independent contractors? A. No, affiliates. 1166. Q. Okay. So, give me an example of why an affiliate would write a training manual? A. Because 1167. Q. Affiliates are the people, as we understood them up until you just spoke, were the little guys around the world who gave their money to Mr. Smith and Mr. Dixit. 25. A. Well, the little guys around the
Page 31 S.R. Schlacht - 215 1 you, it is Grant D'Eall? 2 A. "We", I think, would be regarding 3 Stellar Point as a whole, but Grant D'Eall 4 1159. Q. Okay. 5 Awas responsible for those duties. 6 1160. Q. Okay. And when it comes to the 7 success manual, who, apart from Grant D'Eall, was 8 responsible for preparing the success manual? 9 A. The success manual was in place 10 before my employment, so I have no idea who wrote 11 the initial one. 12 1161. Q. But as at this time, it isthere 13 is reference to a training manual, then. Who was 14 responsible forand let me ask this first: Is a 15 success manual the same as a training manual? 16 A. I don't remember. 17 1162. Q. Well, take a minute and look through 18 it. I suspect you are going to find the answer in 19 there.	Page 33 S.R. Schlacht - 217 1 world, who were affiliates, they recruited. An 2 affiliatedo you know what it is to be an 3 affiliate? You recruit people, and it is 4 commission-based. So, a lot of people would have a 5 team. They would do their own meetings, they would 6 write their own little manuals that had nothing to 7 do with Banners Broker International. They wrote it 8 on their own accord. 9 1168. Q. 10 A. Because people posted this stuff 11 online all the time. 12 1169. Q. 13 there, you would check the online postings about 14 Banners Broker; is that fair? 15 A. Not on a regular basis, no, but I 16 was aware of what is on the Internet. 17 1170. Q. Okay. So, throughout the 15 months 18 that you were at Banners Broker, you were, as a general matter, aware of what was on the Internet
 A. It is right here, yes. Yes, Banners Broker success manual, customer support. 1163. Q. Right. So, when you travelled around the world and met with the independent contractors, and you told us the last time we met that you would give them a training manual, was it 	 about Banners Broker business? A. No. I mean, in regards tothe reason why I was aware of manuals, remember last time we spoke about Vector? And at one point I had been in contact with Vector because affiliates were using incorrect verbiage. So, it was in some of the

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Sheet 10 Page 34	Page 36
S.R. Schlacht - 218 manuals people wrote that verbiage was misused. So, that is why I know there is manuals that people wrote online. 1171. Q. Okay. But you didn't mean to say that all of the 160,000 affiliates wrote manuals, did you? A. No. 1172. Q. Okay. A. That would be silly to say. A. That would be silly to say. 1173. Q. Okay. And in fact, the reality is, it would probably be a very small percentage of those 160,000 people around the world A. I wouldn't be able to 14 1174. Qthat would write manuals? Aanswer that. You would have to ask the 160,000 people around the world for their answer. 13 1175. Q. So, from the work that you did on the Internet, checking about Banners Broker while you were employed by Stellar Point, you don't have a sense of that matter, as to what percentage of affiliates were writing manuals? A. If I were to make an educated guess,	S.R. Schlacht - 220 A. That was when I first started. Tara Josin was responsible for training at that point, so she administered the test to me. 1180. Q. Okay. A. Yes. 1181. Q. And just remind me, was Tara Josin, was she working with you at Stellar Point, or was she working with Chris at Banners Broker? Because I know you have A. I wouldn't have Jo A. I wouldn't have Jo A. I wouldn't have Aseen her paycheque, so you would have to ask her directly. I believe she was working for Stellar Point. J183. Q. Okay. A. But I couldn't J184. Q. Well, I am not asking about her paycheque, but based on where you physically saw her, you believe that she was working with you? A. Yes. J185. Q. At Stellar Point? A. She worked out of our office J186. Q. Okay. A. but she was endu there until
A. If I were to make an educated guess, twould be a small few.	23 1186. Q. Okay. 24 Abut she was only there until
25 1176. Q. Okay. And the review questions that	25 August, and then she
Page 35	Page 37
S.R. Schlacht - 219 you wrote, are theythere was a number of them. Are they the 70 questions that follow the blue tab in production 24? A. Yes, these are questions I wrote while I was studying, because I had to write an exam to make sure I knew the Banners Broker program. 1177. Q. Okay. So, yes, I was going to ask you about that next, actually, Stephanie. When you say "studying", you don't mean studying at a college or a university. This was something else you were studying in relation to Banners Broker? A. When I worked at Stellar Point, Banners Broker was a client. So, because I was going to be working with Banners Broker material, I needed to be well-versed on it if I was going to train or whatnot. So, I got that success manual. I had to study it, and then I had to write a test. And that is what all 1178. Q. Okay. Acustomer support had to do. 1179. Q. Okay. And I don't know about the	S.R. Schlacht - 221 1 1187. Q. Okay. 2 Aparted ways. 3 1188. Q. Right. If somebody was working with 4 you at the Stellar Point office, would it have been 5 common for them to be paid by Banners Broker? 6 A. Not to my knowledge. Most of the 7 peopleI can't reallyI didn't see people's 8 paycheques, but all of the customer support, myself, 9 Jeanette, Grant, all those people were employed with 10 Stellar Point. 11 1189. Q. Okay. So, while you wereI take 12 it from your evidence that while you were studying 13 this success manual in preparation for a test that 14 Tara Josin was going to give you 15 A. M'hmm. 16 1190. Qyou prepared these review 17 questions? 18 A. Yes. 19 1191. Q. And did you prepare the answers that 20 are set out below them, as well? 21 A. I took the answers right out of the
 test that you just described, and it is not something that we have heard about to date. So, I just want to talk about that for a minute. Who administered the test? 	 A. I took the answers right out of the success manual document. 1192. Q. Okay. And why were you providing that work to Chris Smith? A. Because I just threw it in there. I

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Energy 11 Face 32 S.R. Schlacht - 224 1 was a go-getter, and we were, and Stellar Point was in the mists of developing a new successful, so 1 a brought any verbiageyou know, would be nice to pass along. S.R. Schlacht - 224 1 1205. O. O. O. Nay. And just with networe coordinating a payment that Nail wanted to an as to Damse Broker, from suck 5 1193. O. Ckay. S.R. Schlacht - 224 1 1205. O. O. Nay. And just with networe to this semail, and concret hermational 6 A. But this was just my own personal at study Training eveloping Training eveloping 7 1206. O.					
1 was a go-getter, and we were O'sleler Point was 2 in the mists of developing a new successful, so I 3 in the mists of developing and we successful, so I 4 pass along. 5 1195. Q. Okay. 6 A. But this was just my own personal 7 study. 8 1194. Q. Okay. So, fiming-wise, we are 9 atyour -mail was sent to Chris on August 2012, 10 August 1981? 11 A. Yes. 11 A. Theit is whit it says. yes. 1200. O. Work is mathing you would ha		Sheet 11 Page 38			
2 in the midst of developing a new successful, so 1 2 this e-mail, am I correct this you were coordinating pass along. 3 input pass along. a payment it kell warned to, a \$7,000 payment it hell warned to a \$7,000 payment it hell warned to, a \$7,000 payment it hell warned to a \$7,000 payment it hell warned to, a \$7,000 payment it hell warned to a \$7,000 payment					
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3 thought any verbrageyou know, would be nice to pass along. 3 a payment that Veli wanted to marke to Banners Broker, from Banners Broker International 5 1193. Q. Okay. A. But this was just my own personal study. 7 7 study. A. But this was just my own personal study. 7 8 1194. Q. Okay. So, timing-wise, we are study. 8 A. Yes. 9 atyou e-mail was sent to Chris on August 2012, August 1987. 200. Cfrom this eWallet? 11 A. Yes. 1207. Q. Okay. And it looks like: and to pay barners Broker International a ter ob pay and it straight out of the sex alles and to pay and it straight out of the sex alles and to pay any it straight out of the sex alles the twas the condicator flat. as well? 120 A. More the pay and the cost sike: and to bark sike: and to bark sike: and the pay and this sike: and the pay and the p	2		2	this e-mail am I correct that you were coordinating	
4 pass along. C May. 5 1193. Q. Okay. Enters Broker International	12	thought any verbiage, you know would be nice to		a navment that Neil wanted to a \$7 000 navment	
5 1193. C. Okay. Barners Broker International 6 A. But this was just my own personal study. A. But this was just my own personal study. A. But this was just my own personal study. 8 1194. O. Okay. So. timing-wise, we are study. A. Yes. 9 atyou -email was sent to Ohis on August 2012, August 1987. A. Yes. 11 A. Yes. Barners Broker International a feet baid to pay training manual that Stellar Point was developing? 11 A. Yes. Barners Broker International and the sub and training manual that Stellar Point was developing? 13 Mark to the mas that comblete? In Independent contractor. So, that looks like: 14 Mark to the mas that comblete? In Independent contractor. So, that looks like: 15 A. mout baik to bask Grant In Mark to bask Grant In Mark to bask Grant 19 D Califor the dates, because that was his In Independent contractors. In Independent contractors. 20 1198. O. okay. A. Induit is over entime provide and independent contractors. 21 1198. Mark mask that mask has mark to bask framt. In Independent contractors. 21 1198. Mark mask to bask framt. Independent contractors.		nought any verblageyou know, would be nice to		that Noil wanted to make to Dennero Droker from	
6 A. But this was just my own personal 7 Study. C. J. from his eWallet? 7 study. C. Okay. So, timing-wise, we are 1206. Cfrom his eWallet? 9 atyour e-mail was sent to Chris on August 2012, Defore, each independent contractor. So, hiterational a fee for being an 11 A. Yes. Panews Broker International a fee for being an 11 A. Yes. Defore, each independent contractor. So, while years the was 12 1195. O. When in relation to that was the new 13 Taining manual that Stellar Pont was developing? 14 When was that completed? 15 A. Probably within a couple of months 16 of that, but 17 1196. C. Ad, so, would you have been 18 Asoure minative, that is 1208. A. Involid facilitate it between nim 21 1198. O. And, sony uou have been 1209. A. Meditate it between nim 21 1208. O. And is miner, that is 1209. O. Okay. 21 1198. O. And, sony uou would have 23 24 M. Would facilitate it between nim 21 A. Ibelieve	4	pass along.	4		
7 study. 1206. 0. from his eWalle? 8 1194. 0. Okay. So, timing-wise, we are ayour e-mail was sent to Chins on August 2012, 10 August 19th? 1your e-mail was sent to Chins on August 2012, ayou would have sent to Chins on August 2012, 11 A. Yes, the IC face, so like I said before, each independent contractor had to pay 12 1195. 0. When in relation to that was the new 13 independent contractor. So, that looks like independent contractor. So, would look like independent contractor. So, would look like independent contractor. So, would you have been 15 A. Probably within a couple of months independent contractor. That is what it says, yes. 16 A. Independent contractor. So, would you have been independent contractor. 19 D'Eal for the dates, because that was his independent contractor. 20 O. And, so, would you have been an independent contractor. independent contractor. 21 197. Q. And so invoid you have been an independent contractor. 21 D'Eal for the dates, because that was his independent contractor. 21 100. A. Invoid assume. independent contractor. 22 <					
7 study. 7 1206. 0. from his eWalle? 8 1194. 0. Okay. So, timing-wise, we are 9 ayour e-mail was sern to Chris on August 2012, 10 August 18th? 1 ayou re-mail was sern to Chris on August 2012, 9 before, each independent contractor. So, that looks like it was that complete? 11 A. Yes. 1195. 0. When in relation to that was the new training manual that Stellar Pont was developing? 12 When was that complete? 1207. 0. O.Ray. And it hooks like it was has. 15 A. Probably within a couple of months 6 A That is what it says, yes. 11 14 The will be paying line rest via bank. 1208. 0. Okay. 19 D Ealf for the date, because that was his 1208. 0. Nould calitate it between nim 20 proofread or grammatical errors and flow, as you 21 1209. 0. Are 21 A. Ibelieve I did look at it, yes, to 2 0. Okay. 1210. 0. Are	6	A. But this was just my own personal	6	A. Yes.	
8 1194. Q. Okay. Sp. timing-wise, we are get atyour e-mail was sent to Chris on August 2012, August 19th? Barners Broker International a fee for being an independent contractor. So. loke I said before, each independent contractor. So. loke I said to pay independent contractor. So. loke I said I so independent contractor. So. loke	7		7	1206 O from his eWallet?	
9 al., your e-mail was sent to Chris on August 2012, 10 9 before, each independent contractors had to pay Banners Broker International a feet for being an independent contractor. So, that looks like he was paying it straight out of his evaluat. 11 A. Yes. 12 115. O. When in relation to that was the new itraining manual that Stellar Point was developing? 14 When was that completed? 15 A. Probably within a couple of months of that, but 16 of that, but 17 1196. O. Okay. 18 Ayou would have to ask Grant B. Ayou would have to ask Grant B. Ayou would have to ask Grant B. Ayou sould have to ask Grant B. Ayou would have to be cordinating that, as well? 21 198. Csomething you would have success manual? 21 199. C. Okay. 21 New is Razawho was Raza? Someone other than be grammar. 21 D. Delieve I did look at it, yes, to porting it to the independent contractors, and you were a liaise for them? 21 D. Okay. 21 D. Okay. 21 D. Okay. 22 O. Okay. 23 A. Iwould assume. I don't really reads 24 D. Okay. 25 D. Oka				A Ves the IC fees so like I soid	
10 August 19h? 11 A. Yes. 12 1195. Q. When in relation to that was the new training manual that Stellar Point was developing? 13 A. Probably within a couple of months of that, but 14 Main and that Stellar Point was developing? 15 A. Probably within a couple of months of that, but 16 O. Ckay. 17 1196. Q. Okay. 19 D'Eall for the dates, because that was his 19 D'Eall for the dates, because that was his 19 D'Eall for the dates, because that was his 21 Ascorpe. 22 1198. Qsomething you would have to ask Grant success manual? 23 proofread for grammatical errors and flow, as you put itjust let me finish the questionthe new success manual? 25 O. And then the e-mail goes on to say: 24 A. I believe I did look at it, yes, to 26 O. Kay. In fact, you would need to be providing it to the independent contractors, and you were a liais for through this. because you were 7 A. That is correct. 8 1200. Q. Qkay. There is an e-mail at tab 26. 9 I am going to skip a few and move forward. And we wit wit because toway it is just two it syst tw					
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20 that is correct, or phone. [20 directly with Units, but not usuallyit was just	$\begin{array}{c}1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\end{array}$	S.R. Schlacht - 223 A. I believe I did look at it, yes, to do grammar. 1199. Q. Okay. In fact, you would need to be completely familiar with it, because you were providing it to the independent contractors, and you were a liaise for them? A. That is correct. 1200. Q. Okay. There is an e-mail at tab 26. I am going to skip a few and move forward. And we will work backwards through this. It is just two pages, but on thebecause that is the way it reads A. Okay. 1201. Qbut on the second page, you are e-mailing Chris with respect to an IC from Spain? A. Yes. 1202. Q. And by IC, you mean independent contractor? A. That is correct. 1203. Q. And his name was Neil? A. Yes. 1204. Q. Do you remember dealing with Neil from Spain?	$ \begin{array}{c} 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\\ \end{array} $	S.R. Schlacht - 225 Now, is Razawho was Raza? Someone other than Neil, presumably. A. I would assume. I don't really recall. He would have been an affiliate, but I don't remember. 1211. Q. Okay. So, Raza would have been an affiliate, as opposed to an independent contractor? A. He definitely wasn't an independent contractor. 1212. Q. So, he definitely was an affiliate? A. If he is doing withdrawal, then, yes, he would have been an affiliate. 1213. Q. Okay. So, at this time in August of 2012, you were also facilitating affiliate withdrawals for Mr. Smith? A. No, with this one, it might have been an odd one, but, no, that wasn't my job. 1214. Q. Okay. But in this case, you were doing that, though, correct? It may have beenyou say it is an odd job, but it was something that you were doing in August of 2012? A. Sometimes support questions would come in, and if it was someonesometimes they get	
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	Sheet 12 Page 42 S.R. Schlacht - 226		Page 44 S.R. Schlacht - 228
1	following up.	1	and there were certain tools that they needed so
	1215. Q. Okay. But if you were asked to	2	they could help the affiliates in their region and
23	facilitate an affiliate withdrawal, presumably you	1 2	get into their back office.
4	would do it?		1224. Q. Okay. And when you say "tool", is
		2 3 4 5	that a password? What is a tool?
5	A. Pardon? Could you repeat that?		
67	1216. Q. If you were asked to facilitate,	6	A. A tool, it is an online ability to
	which is your word, an affiliate withdrawal	7	do certain things.
8	A. No, sorry, not with affiliates. I	8	1225. Q. To gain access, right?
	may pass along a message from an affiliate to Chris,	9	A.To gain access.
10	but I never facilitated withdrawals between	10	1226. Q. It is an ability to gain access so
11	affiliate and Banners Broker International.	11	that they can so that the ICs can communicate with
12 13	1217. Q. Okay. So	12	their affiliates?
13	A. Just independent contractors.	13	A. So that if an IC calls in with a
14 15	1218. Q. So, let's go back to this e-mail,	14	question, that IC or their staff can do directly
15	then, and I am reading from the second-last	15	into the affiliate's account and take a look at it.
16	sentence. You say:	16	1227. Q. Okay. Okay. And, so, why would
17	"Also, could"	17	Stellar Point be involved in that aspect of
18	You are writing to Chris Smith:	18	operations in providing tools so that ICs could
19	"Also, could you keep me updated on the	19	communicate with their own affiliates?
20	status of Raza's withdrawal via bank or	20	A. Because Stellar Point did all of
21	wire so I can keep him posted?"	121	that type of work for Banners Broker International.
22	Now, first of all, do you have a specific	21	Like I said, I worked with the independent
23	recollection of what you were doing here?	23	contractors on all aspects of support and making
24	A. No, I do not. It was quite a few	24	sure that they got their commissions. So, this was
25	years ago. I was just asking for an update.	25	an aspect of support.
20	years ayo, I was just asking for an update.	1160	
!	Page 43		Page 45
	Page 43 S.R. Schlacht - 227		Page 45 S.R. Schlacht - 229
1	S.R. Schlacht - 227 1219. Q. Okay. And you were asking Mr. Smith	1	S.R. Schlacht - 229 1228. Q. Okay. So, logistically, then, am l
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1 2 3	S.R. Schlacht - 227 S.R. Schlacht - 227 1219. Q. Okay. And you were asking Mr. Smith for an update, presumably, because we are both looking at the same e-mail	1 2 3	S.R. Schlacht - 229 S.R. Schlacht - 229 1228. Q. Okay. So, logistically, then, am I right that through the mechanism of these tools, Stellar Point could either allow or disallow the
1 2 3 4	S.R. Schlacht - 227 S.R. Schlacht - 227 1219. Q. Okay. And you were asking Mr. Smith for an update, presumably, because we are both looking at the same e-mail A. Yes.	1 2 3	S.R. Schlacht - 229 1228. Q. Okay. So, logistically, then, am I right that through the mechanism of these tools, Stellar Point could either allow or disallow the affiliates fromthe independent contractors from
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$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\\24\\25\end{array}$	 S.R. Schlacht - 231 to Brea? A. Yes. 1239. Q. It is Brea Hardowa? A. Correct. 1240. Q. Who was a Banners Broker International employee? A. I believe she was employed with Stellar Point. 1241. Q. Okay. A. But you would have to clarify with her. 1242. Q. But she worked with you out of the same office at various times, or was she at a different office? A. No, she was hired to be Chris' assistant, and Chris worked from the Church Street location only. 1243. Q. Okay. I would have thought that that would have made Breaworking with Chris would have made herif she was Chris' assistant, wouldn't she be a Banners Broker International person? A. You would have to check with her. 1244. Q. Okay, but why did you believe that she was Stellar Point? 	1 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 S.R. Sch S. Sch S. Sex State S. Sex State<td>g an e-mail. are drafting t an IC ould ask she could on that I Raj to ne best So, while it when I bu, and k it is fair</td><td></td>	g an e-mail. are drafting t an IC ould ask she could on that I Raj to ne best So, while it when I bu, and k it is fair	

Sh	eet 14 Page 50		. Page 52 51
4 5 6 7 8 9 10 11 12 13 14 15 16 1 7 8 19 20 21	S.R. Schlacht - 234 to do with an invoice. I could not give you the specifics. You could ask Raj. 1255. Q. So, as a general matter, you were facilitating, to use your word from earlier, a wire transfer from the independent contractor in France, Christelle, to Mr. Smith. Can we agree on that, leaving aside the specifics? A. That is what it appears to look like, yes. 256. Q. I will move on. And then the next tab is tab 30, whichyou may have a similar answer to this. Again, you are e-mailing Chris, and there is a reference to bank info, invoice from Trinidad & Tobago; that is in the subject line? A. Yes. 257. Q. Who isand then further on, who is Ephraim? A. Ephraim was the independent contractor for Trinidad & Tobago, and I was just facilitating information passed on from him and giving it to Chris, so 258. Q. Okay. So, you would deal with Ephraim and get bank information and invoicing information, and then you would take that and you would give it to Mr. Smith?	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 20 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 2 3 4 5 6 7 8 9 10 11 2 2 3 4 5 5 6 7 8 9 10 1 1 2 3 4 5 5 6 7 8 9 10 1 1 2 3 4 5 5 6 7 8 9 10 1 1 2 2 3 4 5 5 8 9 10 1 1 2 2 3 4 5 5 10 1 1 2 2 3 4 5 5 1 2 2 2 3 1 2 2 3 2 2 2 3 2 2 3 2 2 3 2 2 3 2 2 3 2 2 3 2 2 3 2 2 2 3 2 2 2 2 2 2 3 2	 1264. Q. If you could wait for a question. The invoice is addressed to Banners Broker International Limited? A. Correct. 1265. Q. So, you may have already given me this answer, but was it common for you to receive, being a Stellar Point employee reporting to Mr. Dixit, to receive any deal with invoices to a different company? A. Like I told you about ten times already, my job was to deal with independent
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 1273. Q. You mean sales statistics? A. Sales statistics for each country. 1274. Q. Okay. A. He had told me how to figure out the commission. It is by a certain percentage, which you can look back in your notes. I explained it all then. And then I would let the independent contractor know the details. 1275. Q. The details of what? A. Of how much commission they would be getting. 1276. Q. Right. A. They had to fill out a form to get paid with all their banking information each time. I would pass it along to Chris, Chris would facilitate the wire, Chris would let me know the wire had been paid. I would go back to the independent contractor, letting them know the wire had been sent. 1277. Q. Okay. And if the independent contractor had any questions regarding that 	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	 Page 56 S.R. Schlacht - 240 became more and more familiar with the types of questions that these ICs were putting to Banners Broker. A. Well, they asked me the question. So, yes, I was aware of questions. 1283. Q. Okay. And you were aware of the answers to those questions? A. The answers only had to do with money, and that was only dealt with by Chris Smith. 1284. Q. Okay. Tab 32 of the same book is an e-mail from yourself to Chris. A. M'hmm. 1285. Q. And it starts with: "Hello from India" A. M'hmm. 1286. Q. The date of October 2012? A. Yes. 1287. Q. And it says: "Just followed up. I have not received stats from Matt" Is that Matthew Lynn? A. That is Matthew Lynn. 1288. Q. And what stats were you waiting to 	
24 25 1 2 3 4 5 6 7 8 9 10 11 12 13 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23 24	 calculation, they would put them to yourself? A. They would send them to me and then Page 55 S.R. Schlacht - 239 I would pass them to Chris. 1278. Q. But if you could address the question yourself, then you would deal with it. It would only be the ones that you couldn't answer that you would pass on to Mr. Smith, correct? A. That is correct, because it was a simple mathematical equation, so it is pretty black and white. 1279. Q. Right. A. But they generally didn't have a question about that. They generally have a question that only Chris Smith could answer. 1280. Q. And if that was the case, Chris Smith would explain the answer to you, and you would, again, deal with the independent contractor? A. He would send me back an e-mail, and I would generally just forward it to the independent contractor. 1281. Q. Okay. But you would look at the e-mail, and you would understand that the answer was responsive to the question? Would you do that at least? A. I would make sure it was responsive to the question, and then I would forward it on. 	24 25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 17 10 10 11 12 13 14 15 16 10 10 11 12 13 14 15 10 10 10 11 12 13 14 15 10 10 11 12 13 14 15 10 10 11 12 13 14 15 10 10 11 12 13 14 15 10 11 12 13 14 15 10 10 11 12 13 14 15 10 10 10 11 12 13 14 15 10 10 11 12 12 11 12 13 14 15 10 11 12 13 14 15 10 10 11 12 13 14 15 16 17 10 11 12 13 14 15 16 17 11 12 13 14 15 16 17 11 12 22 23 24	receive from Matthew? A. The commission statistics Page 57 S.R. Schlacht - 241 1289. Q. Okay. Athat we just spoke about. 1290. Q. And what was thewhen you say "Hello from India", were you in India on Banners Broker business? A. It must have been to do with training, because that is the reason why I travel. 1291. Q. So, you were in India on Banners Broker business, then? A. In regards to training, yes. 1292. Q. Okay. A. No, anyall my travellingyes. Yes, I would assume so. 1293. Q. Okay. Were you in India more than once or just one? A. I believe I went twice. 1294. Q. Okay. And was the other occasion that you went to India for the purpose of Banners Broker business? A. Stellar Point was opening an office in India. 1295. Q. Okay. So, both times you went to India were for the purpose of Banners Broker business?	

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Encent 16 Page 59 S.R. Schlacht - 242 1 for Banners Boylen, yes. S.R. Schlacht - 242 1 1286 O. Cky., And this e-mail is dated in October 2012? S.R. Schlacht - 242 1 1308. O. or try to India? 5 A. Transiting in Indian, Ike 6 e-mail, yes. A loon't wain to give you an exact 1 morth, out Delive it was in the early new year of 2013. Not traveling with early new year of 2013. 1298. C. Kay. And on this occasion that you were there for training, but New You traveling with early new year of 21 you traveling with and just 18 1299. C. Way. And when was the old his own, in liftle 31 more detail whoy out intared, what you trained them 22 on for tow long				J
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25 David Hooker came along from a Banners Broker 25 third trip, but it would have been connected. Page 59 S.R. Schlacht - 243 1 International aspect, and he did his own, like, seminars. S.R. Schlacht - 243 1 International aspect, and he did his own, like, seminars. S.R. Schlacht - 243 1 International aspect, and he did his own, like, seminars. S.R. Schlacht - 243 1 International aspect, and he did his own, like, seminars. S.R. Schlacht - 243 1 1300. Q. Okay. So, is it just yourself and David? A. Iknow I went to Bangalore? 6 1301. Q. Anyone else? A. Not that I can remember. 7 A. Not that I can remember. Bangalore, did you go to another country, apart from Bangalore? 9 was that also for training? A. I don't remember. 10 A. Ibelieve so. 1315. Q. Well, did you go toI thought that it was a country. 11 1303. Q. Okay. So, you have only been to 1315. MS. DOSANJH: Actually, it is a state. 13 1304. Q. Were you alone? 15 MS. DOSANJH: So, it is 16 India twice, and the first time you were there with 16 THE DEPONENT:Bang		going to be taking support questions out there, like		
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24 1307. Q. Okay. Was hisdo you know if 24 BY MR. WARD:	24		24	BY MR. WARD:
25 Raj's family was there with you? 25 1317. Q. So, was Raj's sister with you on	25		25	1317. Q. So, was Raj's sister with you on_

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1 frait trip? 1300. 0. And what would you took? What was the purpose of taking notes 2 A. See and account of the modes and account of the mode acc		S.R. Schlacht - 246		S.B. Schlacht - 248 22
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141327.Q. Okay. And when you say "training", we are talking about a situation where you were training independent contractors or affiliates?141340.Q. Right. And the customers were the affiliates?16training independent contractors or affiliates?16A. That would be correct.17A. Independent contractors.161341.Q. Okay. And then just to close off on this, I would like to, if you can recall, tell me approximately how long you were in India on each occasion?181328.Q. Okay. Apart from taking notes of else on the October 2012 trip to India?19approximately how long you were in India on each occasion?21A. No. I could have done some training, but like I said, other than training and onotetaking, I wasn't21A. The first one was, I think, just over two weeks, and the second one, I believe, was a week.241329.Q. Okay.241342.Q. Okay. So, for the first one, when				
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24 1329. Q. Okay. 24 1342. Q. Okay. So, for the first one, when	21			
24 1329. Q. Okay. 24 1342. Q. Okay. So, for the first one, when	21 22	training, but like I said, other than training and		
1.25 A daing anything also 11.25 you ware taking notes would you have been you can	21 22 23	training, but like I said, other than training and notetaking, I wasn't	23	week.
25 Adoing anything else. 25 you were taking notes, would you have beenyou can	21 22 23 24	training, but like I said, other than training and notetaking, I wasn't 1329. Q. Okay.	23 24	week. 1342. Q. Okay. So, for the first one, when

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S.R. Schlacht - 252 late August of 2013... A. Yes? . . . P

	Sheet 18 Page 66		Page 68
	S.R. Schlacht - 250		S.R. Schlacht - 252
1	tell me, presumably you wouldn't, but I take it you	11 1	late August of 2013
2	weren't taking notes every day for two weeks? Some		A. Yes?
2 3	of that was a baliday time, was it?	23	
	of that was a holiday time, was it?		
4 5	A. None of it was holiday.	4	an appreciation of the size and scope of the Banners
	1343. Q. Okay. So, you had two weeks of	5	Broker operations?
6	meeting with affiliates, then?	6	A. The Banners Broker
7	A. Yes, I may have, like, an afternoon	11 '	1355. Q. The size of the international scope.
8	off, and then I would go, kind of	8	I mean, the numbers of affiliates around the
9	1344. Q. Okay.	9	world
10	Atake a look at the sights.	10	A. Yes, I have an understanding.
11	1345. Q. Okay.	11	1356. Q. Okay. And I take it you had that
12	A. But that was on my own personal	12	understanding because of information similar to that
13	time.	13	that we see produced at tab 36, which is described
14	1346. Q. Okay. So, you and Mr. HookerMr.	14	as a confidential list of account membership?
15	Dixit must have met with a lot of affiliates in	15	A. I wouldn't beI was just cc'd on
16	India if you did that for two weeks?	16	this a mail so I probably didn't road it but
17	A. Yes.	17	this e-mail, so I probably didn't read it, but
			working with Chris and working on Banners Broker
18	1347. Q. Okay. And where would you meet	18	International things, I was aware of how many
19	them? Was it in a convention hall? Is it in a	19	affiliates.
20	restaurant?	20	1357. Q. So, is it
21	A. If you haven't been to India, it	21	A. The exact number
22	could be anywhere. It could be in a reception hall.	22	1358. Q. Yes, but as a general matter,
23	It could be in a caf, on the side of the street.	23	presumably you knew, having been copied on
24	1348. Q. Right. And, so, how manywas	24	information like this, that there were tens of
25	there such thing as a typical meeting that you would	25	thousands of affiliates in scores of countries
	Page 67	, I	Page 69
	2		
1	S.R. Schlacht - 251		S.R. Schlacht - 253
1	S.R. Schlacht - 251 have with affiliates? Because I want to get a sense	1	S.R. Schlacht - 253 around the world?
1	S.R. Schlacht - 251 have with affiliates? Because I want to get a sense of the numbers.	1	S.R. Schlacht - 253 around the world? A. Yes, I was aware of that.
1 2 3	S.R. Schlacht - 251 have with affiliates? Because I want to get a sense of the numbers. A. David Hooker was doing seminars.	1 2 3	S.R. Schlacht - 253 around the world? A. Yes, I was aware of that. 1359. Q. Justthere is actually two charts,
1 2 3	S.R. Schlacht - 251 have with affiliates? Because I want to get a sense of the numbers. A. David Hooker was doing seminars. So, those would generally have, like, a couple of	1 2 3 4	S.R. Schlacht - 253 around the world? A. Yes, I was aware of that. 1359. Q. Justthere is actually two charts, Erin points out, that you were copied on. Lynn sent
1 2 3 4 5	S.R. Schlacht - 251 have with affiliates? Because I want to get a sense of the numbers. A. David Hooker was doing seminars. So, those would generally have, like, a couple of hundred people, or I would say anywhere from 20 to a	1 2 3 4 5	S.R. Schlacht - 253 around the world? A. Yes, I was aware of that. 1359. Q. Justthere is actually two charts, Erin points out, that you were copied on. Lynn sent them to
1 2 3 4 5 6	S.R. Schlacht - 251 have with affiliates? Because I want to get a sense of the numbers. A. David Hooker was doing seminars. So, those would generally have, like, a couple of hundred people, or I would say anywhere from 20 to a couple hundred people.	1 2 3 4 5 6	S.R. Schlacht - 253 around the world? A. Yes, I was aware of that. 1359. Q. Justthere is actually two charts, Erin points out, that you were copied on. Lynn sent them to MS. DOSANJH: Are those the attachments
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1234567890123456	S.R. Schlacht - 251 have with affiliates? Because I want to get a sense of the numbers. A. David Hooker was doing seminars. So, those would generally have, like, a couple of hundred people, or I would say anywhere from 20 to a couple hundred people. 1349. Q. Okay. And that is where you monitored and took notes, at the seminars? A. Yes. 1350. Q. Okay. And apart from the seminars, were there other meetings with affiliates? A. There wasleaders would come in with questions from their team, and sit down with David Hooker and Raj.	1 3 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0	S.R. Schlacht - 253 around the world? A. Yes, I was aware of that. 1359. Q. Justthere is actually two charts, Erin points out, that you were copied on. Lynn sent them to MS. DOSANJH: Are those the attachments with the 1360. MR. WARD: They are. MS. DOSANJH: Yes, okay. With the country names and some codes on the bottom? 1361. MR. WARD: That is right, and they are described as beingthe first chart is "Total Members", and the second chart is "Paid Members". MS. DOSANJH: Page 10. THE DEPONENT: Okay, yes, I know what
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2 A which that was about to exore, system subject he is 'subject he 'su	1		1	
3 you would have to purchase apackage at that time. 3 office information and cetails. So, that is what 4 Some people never purchased packages, so they would just be a member. If they went on to purchase a something, they would be a pad 5 1372. Q. Okay. And it was also in regards to an update in respect of Spain? 7 1364. Q. Okay, than you. And then tab 37, it appears half you authored the semal, and the subject in is 's'tle updates.' 5 1373. Q. Right. And then tab 38, Idon't understand this updates. no. what not pack in the your email, because the first sentence say and you 1374. Q. Right. And then tab 38, Idon't understand this updates. no. you wereor 16 1366. Q. So, just help me understand this updates. no. you were larged in regards to sem duot to be addets. 1375. Q. Do I take it that you wereor 17 Stellar Point, and you can tell me if there is a distinction there, were preparing invoces for Goube Media to send out in obegendent contractors? 1375. Q. Do I take it met you wereor 18 A wes? 1375. Q. Do I take it met you wereor 19 1376. Q. So, just help me understand this updates. no so that when a atiliterent to interpret to basiness, they were programmers. When I am the fore met obecarded to the website update to be addet to the website update. 20 A. Theye were programmers. When I am the fore met obecarded to the website update. 3 S.R. Schlacht - 255 <	2	A	2	
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18wanted to make sure that Vince and Johnný updated it181380.Q.Só, the proposal, if I am reading19from a technical standpoint so that it would support19this correctly, was that you would prepare the20tickets and phone support for India?19this correctly, was that you would prepare the21A.That is correct.21221371.Q.Okay. And then further on, you were2223also giving them some instructions in regard to23I was24Spain?24"Please advise me on information,	1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0	S.R. Schlacht - 255 question, they could click on Spain or India, and then those questions would go to their support system as opposed to Stellar Point, who was 1367. Q. Okay. Adoing the support system. 1368. Q. Right. So, Vince and Johnny were computer programmers at Stellar Point? A. I believe they were employed with Stellar Point. 1369. Q. Okay. And, so, I guess the purpose of this e-mailand thank you for that explanation, it is just that you were telling Vince and Johnny to make sure that the Stellar Point website is updated to support A. No, not the Stellar Point, sorry.	1 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0	S.R. Schlacht - 257 recipients, is what? Again, you wrote this, and just help me understand what is being proposed here. A. Yes. So, independent contractors, when we became an independent contractor for Banners Broker International, they needed to pay an initial fee. So, to pay that fee, Chris requested that they send the money to GCube Media. 1377. Q. Right. A. But they needed an invoice. 1378. Q. Okay. So, you say, in the last sentence of this e-mail: "Please advise me on what information to include on the invoice, or how you want me to move forward with this" A. Yes.
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23 also giving them some instructions in regard to 23 I was 24 Spain? 24 "Please advise me on information,	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\17\\18\\9\\20\\21\end{array}$	S.R. Schlacht - 255 question, they could click on Spain or India, and then those questions would go to their support system as opposed to Stellar Point, who was 1367. Q. Okay. Adoing the support system. 1368. Q. Right. So, Vince and Johnny were computer programmers at Stellar Point? A. I believe they were employed with Stellar Point. 1369. Q. Okay. And, so, I guess the purpose of this e-mailand thank you for that explanation, it is just that you were telling Vince and Johnny to make sure that the Stellar Point website is updated to support A. No, not the Stellar Point, sorry. The Banners Broker International website. 1370. Q. I see. But the point was that you wanted to make sure that Vince and Johnny updated it from a technical standpoint so that it would support tickets and phone support for India?	1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 11 11 23 11 11 23 11 11 23 11 12 13 11 11 23 11 12 13 11 11 12 13 11 11 11 11 11 11 11 11 11 11 11 11	S.R. Schlacht - 257 recipients, is what? Again, you wrote this, and just help me understand what is being proposed here. A. Yes. So, independent contractors, when we became an independent contractor for Banners Broker International, they needed to pay an initial fee. So, to pay that fee, Chris requested that they send the money to GCube Media. 1377. Q. Right. A. But they needed an invoice. 1378. Q. Okay. So, you say, in the last sentence of this e-mail: "Please advise me on what information to include on the invoice, or how you want me to move forward with this" A. Yes. 1379. Q. So A. I am just asking them to 1380. Q. So, the proposal, if I am reading this correctly, was that you would prepare the invoice so that the independent contractors could
24 Spain?	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\17\\8\\9\\21\\22\\21\\22\end{array}$	S.R. Schlacht - 255 question, they could click on Spain or India, and then those questions would go to their support system as opposed to Stellar Point, who was 1367. Q. Okay. Adoing the support system. 1368. Q. Right. So, Vince and Johnny were computer programmers at Stellar Point? A. I believe they were employed with Stellar Point. 1369. Q. Okay. And, so, I guess the purpose of this e-mailand thank you for that explanation, it is just that you were telling Vince and Johnny to make sure that the Stellar Point website is updated to support A. No, not the Stellar Point, sorry. The Banners Broker International website. 1370. Q. I see. But the point was that you wanted to make sure that Vince and Johnny updated it from a technical standpoint so that it would support tickets and phone support for India? A. That is correct.	1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 1 1 2 3 4 5 1 1 2 3 1 1 2 3 1 1 1 2 3 1 1 1 2 3 1 1 1 2 3 1 1 1 1	S.R. Schlacht - 257 recipients, is what? Again, you wrote this, and just help me understand what is being proposed here. A. Yes. So, independent contractors, when we became an independent contractor for Banners Broker International, they needed to pay an initial fee. So, to pay that fee, Chris requested that they send the money to GCube Media. 1377. Q. Right. A. But they needed an invoice. 1378. Q. Okay. So, you say, in the last sentence of this e-mail: "Please advise me on what information to include on the invoice, or how you want me to move forward with this" A. Yes. 1379. Q. So A. I am just asking them to 1380. Q. So, the proposal, if I am reading this correctly, was that you would prepare the invoice so that the independent contractors could send their fees to GCube Media?
	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\17\\8\\9\\21\\22\\21\\22\end{array}$	S.R. Schlacht - 255 question, they could click on Spain or India, and then those questions would go to their support system as opposed to Stellar Point, who was 1367. Q. Okay. Adoing the support system. 1368. Q. Right. So, Vince and Johnny were computer programmers at Stellar Point? A. I believe they were employed with Stellar Point. 1369. Q. Okay. And, so, I guess the purpose of this e-mailand thank you for that explanation, it is just that you were telling Vince and Johnny to make sure that the Stellar Point website is updated to support A. No, not the Stellar Point, sorry. The Banners Broker International website. 1370. Q. I see. But the point was that you wanted to make sure that Vince and Johnny updated it from a technical standpoint so that it would support tickets and phone support for India? A. That is correct. 1371. Q. Okay. And then further on, you were	1 2 3 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 10 11 12 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	S.R. Schlacht - 257 recipients, is what? Again, you wrote this, and just help me understand what is being proposed here. A. Yes. So, independent contractors, when we became an independent contractor for Banners Broker International, they needed to pay an initial fee. So, to pay that fee, Chris requested that they send the money to GCube Media. 1377. Q. Right. A. But they needed an invoice. 1378. Q. Okay. So, you say, in the last sentence of this e-mail: "Please advise me on what information to include on the invoice, or how you want me to move forward with this" A. Yes. 1379. Q. So A. I am just asking them to 1380. Q. So, the proposal, if I am reading this correctly, was that you would prepare the invoice so that the independent contractors could send their fees to GCube Media? A. I didn't prepare invoices. I think
25 A. Yes, on the Banners Broker 25 invoice or how you want me to move	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\9\\20\\21\\22\\23\\24\end{array}$	S.R. Schlacht - 255 question, they could click on Spain or India, and then those questions would go to their support system as opposed to Stellar Point, who was 1367. Q. Okay. Adoing the support system. 1368. Q. Right. So, Vince and Johnny were computer programmers at Stellar Point? A. I believe they were employed with Stellar Point. 1369. Q. Okay. And, so, I guess the purpose of this e-mailand thank you for that explanation, it is just that you were telling Vince and Johnny to make sure that the Stellar Point website is updated to support A. No, not the Stellar Point, sorry. The Banners Broker International website. 1370. Q. I see. But the point was that you wanted to make sure that Vince and Johnny updated it from a technical standpoint so that it would support tickets and phone support for India? A. That is correct. 1371. Q. Okay. And then further on, you were also giving them some instructions in regard to	1 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 14 5 16 7 8 9 0 11 12 13 14 5 16 7 8 9 0 11 12 13 14 5 16 17 10 10 10 10 10 10 10 10 10 10 10 10 10	S.R. Schlacht - 257 recipients, is what? Again, you wrote this, and just help me understand what is being proposed here. A. Yes. So, independent contractors, when we became an independent contractor for Banners Broker International, they needed to pay an initial fee. So, to pay that fee, Chris requested that they send the money to GCube Media. 1377. Q. Right. A. But they needed an invoice. 1378. Q. Okay. So, you say, in the last sentence of this e-mail: "Please advise me on what information to include on the invoice, or how you want me to move forward with this" A. Yes. 1379. Q. So A. I am just asking them to 1380. Q. So, the proposal, if I am reading this correctly, was that you would prepare the invoice so that the independent contractors could send their fees to GCube Media? A. I didn't prepare invoices. I think I was

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	Sheet 20 Page 74		_ Page 76
	S.R. Schlacht - 258		S.R. Schlacht - 260
1	forward"	1	A. Did I make the itinerary?
2	Yes, I don't remember, but I know that I didn't	2	2 1392. Q. Yes?
3	prepare the invoices, so I can only	3	A. I can assume so. Yes, it is not
4	1381. Q. So, if one of yourthe independent	4	here, but
5	contractors that you were liaising with, for	5	5 1393. Q. No.
6	instance, this one, required an invoice in respect	6	AI did generallywhen we went on
7	of a payment that they needed to make, how would you	7	trips, if we had meetings booked, I would create for
8	address that	8	everybody that was going. I would create, like, a
9	A. I would	8	day-by-day, what meetings were where
10	1382. Qrequirement?	10	1394. Q. Right.
11	Asend a request over to Chris, and	11	Atype thing.
12	either himself or Brea would make the invoice.	12	1395. Q. And where would you get the
13	1383. Q. Okay. And then they would provide	13	
14	the invoice to you, and you would provide it to the	14	
15	independent contractors?	15	
16	A. That is correct.	16	their country, they would be the ones that were
17	1384. Q. So, when you say in this e-mail:	17	1396. Q. Requesting the meetings?
18	"Please advise me on what information to	18	A. Yes, requesting setting them up. If
19	include on the invoice"	19	
20	I take it that they didn't, because you are saying	20	
21	that you didn't prepare the invoice, that somebody	21	Athat type of thing.
22	else did, ultimately?	22	, ,
23	A. I think I meant that if they wanted	23	requests, just so we are clear, when it came to
24	me toif Chris wanted me to put oneI don't	24	meeting requests from the independent contractors in
25	know. I know that I didn't write them. I may have	25	relation to overseas travel, you would coordinate
	Page 75		Page 77
	Page 75 S.R. Schlacht - 259		Page 77 S.R. Schlacht - 261
1	Bage 75S.R. Schlacht - 259 been asking if he needed me to do one, but	1	S.R. Schlacht - 261 those meeting requests and set the itineraries for
1 2	Bage 75 S.R. Schlacht - 259 been asking if he needed me to do one, but I didn'tthat wasn't in my job usually	1 2	S.R. Schlacht - 261 those meeting requests and set the itineraries for Mr. Smith and presumably Mr. Dixit and others?
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23 24 25	S.R. Schlacht - 262 this document along, but this would have been prepared by Colin. 1405. Q. Okay. So, on the second page, Saturday, December 1, 2012 A. Yes? 1406. Qthere is a half-hour timeslot which seems to be dedicated to yourself? A. Yes. 1407. Q. It says: "Subject: Panels/sales credits" So, did that presentation actually take place? A. We talked about this extensively last time. Is there a new question about it? Like, you spent about a half an hour on this subject last time 1408. Q. And there is a couple of ways we can do this. First of all, we are now turning to specific documents. So, when I put questions to you, you have the benefit of knowing A. Okay. 1409. Qwhat information the receiver has. I think it is a fairer way to approach these documents with you, Stephanie. A. Okay. 1410. Q. So	1 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 3 24 25	S.R. Schlacht - 264 imagine there were more than one conventions that you spoke at? A. No, I only spoke at this time. 1419. Q. So, you only ever spoke at one convention? A. That is correct. 1420. Q. Okay. But in addition, there were meetings of affiliates that you would have spoken at? A. No. 1421. Q. So, your evidence is that in the entire 15 months that you were at Banners Broker, you only spoke to either affiliates or independent contractors in a seminar or presentation context on this one occasion? A. Yes. I only ever spoke in front of a large group of people in regards to this the one	
	Page 79 S.R. Schlacht - 263		Page 81]
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 A. Shouldn't that have just been done the first time, to avoid all that wasted time, then? 1411. Q. No. That is not the way A. All right, ask away. 1412. Qthat we are going to proceed. A. Yes, ask away. 1413. Q. And we did talk a little bit, in fairness, about, as a general matter, what you did at conventions. A. Yes. 1414. Q. Okay? But now we have a specific example which I think is deserving A. Okay, fair 1415. Qof some inquiry. Aenough. Ask away. 1416. Q. Can you just confirm for me that this proceeded, and you spoke on December 1st for half an hour and provided a PowerPoint presentation A. Yes. 1417. Qon panels and sales credits to A. It was more about 15 minutes, but, yes, I did speak at that convention. 1418. Q. Okay. And this particular convention, because correct me if I am wrong, but I 	$\begin{array}{c}1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\\24\\25\end{array}$	S.R. Schlacht - 265 1423. Q. Okay, thank you. A. Yes. 1424. Q. Now I am clear on that now. So, tab 42, something that I think we need to spend some time on. The subject is "Sweden Update". A. Sure. 1425. Q. And you are writing to Raj. I take it he was not in Sweden with you in December of 2012? A. No, he was not. 1426. Q. Okay. So, you are reporting to him on what you are doing in Sweden? A. Correct. 1427. Q. And who were you withwas this trip on Banners Broker or Stellar Point business? A. I was with David Hooker. I was there to train an independent contractor, and David Hooker was there to do seminars for 1428. Q. Okay. ABanners Broker International. 1429. Q. Okay. Was anybody else there on this trip? A. No. 1430. Q. Okay. So, the third paragraph, you are telling Raj:	

	Shoot 22 Page 82		Page 84
	Sheet 22 Page 82 S.R. Schlacht - 266		S.R. Schlacht - 268
1	"We have covered day one of training"	1	going into detail, because it has been so many
2	A. M'hmm.	2	years.
2	1431. Q. "which is the review of the	23	1440. Q. So when you say "people didn't know
4	program, a condensed version of the	4	where their ads were being placed", those people
	one-week training that we do in Canada"		were the affiliates or Banners Broker?
5	So, this is training of ICs, presumably?	5 6 7	A. Those were the affiliates, because
7	A. This is support training to the ICs.		there was a choice network and a blind network. A
8	1432. Q. Okay. And I am intrigued by the		choice network, when you are uploading your banners,
9	reference to a week of training in Canada.	8	you could choose where you wanted your ad or your
10	A. Yes.	10	banner to go, whereas a blind network, you
11	1433. Q. Would some ICs come to Canada for a	111	couldthe blind network, how it worked is you
12	week to be trained?	12	
13	A. No. One-week training was in	13	could choose a location and, like, the type of
14		13	website, but you couldn't choose the specific
15	regards to the training that Stellar Point employees	14	website, whereas the choice network, there was a
16	got if they were doing support. 1434. Q. Okay. Okay. You say that these	16	list of websites to choose where you wanted your
17	independent contractors that you are training in	17	banner to go. 1441. Q. Okay.
18	independent contráctors that you are training in Sweden need extra attention in the areas of blind	18	A. Does that
19		19	
20	network and organic traffic? A. That is correct.	20	
21	1435. Q. And the blind network in particular	20	network, or did somebody else havelike, where would we see the blind network? Where did it
22			reside?
23	is something that we hear from time to time, but I have never understood it.	22	
24	A. Yes.	23	
25	1436. Q. What is a blind network in the	25	outside company that they used. I don't know. You would have to ask Chris Smith about those details.
20	Page 83	J	
]	Page 85 S.R. Schlacht - 260
1	S.R. Schlacht - 267		S.R. Schlacht - 269
1	S.R. Schlacht - 267 Banners Broker context?	1	S.R. Schlacht - 269 I wasn't privy to that, but they used an outside
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Sheet 23 Page 86	- 528
S.R. Schlacht - 270 don't remember, then I will accept that as your answer. A. Okay. It is just difficult to explain, and 1448. Q. Okay. A. I don't want to misspeak. 1449. Q. Okay. So, then, the second term that we see in your e-mail is organic traffic A. Yes. 1450. Qwhich you note: 1450. Qwhich you note: A. Yes. 1451. Q. So, what are you referring to by "organic traffic"? A. I don't remember, to be honest. Traffic is visits to websites. Organic traffic, I would have to look it up. I don't remember. 1452. Q. Okay. But, again, at the time A. At the time, yes. 1453. Qthat you were training people, presumably you knew everything there was to know about organic traffic, so you could explain it in detail	S.R. Schlacht - 272 the terms and conditions, and we would go over it, yes. 1462. Q. And you would answer any questions that they had? A. If I knew the answer. If I didn't, then I would pass it along to Chris. 1463. Q. Okay. And then: "Key points of refund policy" Is your answer the same as for terms and conditions, that you would provide the refund policies and answer questions to the extent that you could? A. That is correct. 1464. Q. And it says: "List and explain all tabs in your back office" Kas that something that you did as well for the ICs? A. Listing and explaining all the tabs? Yes. 1465. Q. Okay. And what are the tabs in the back office? A. Tabs would have beenlike, when you go into the back office as 231466. Q. How would I go into the back office if I wanted to
25 A. Yes. S.R. Schlacht - 271 1 1454. Qas you note? 2 A. That is correct. 3 1455. Q. Okay. And similarly, there is a 4 list of bullet points on the bottom of page 1? 5 A. Yes. 6 1456. Q. "Homework given on day one" 7 A. Yes. 8 1457. Q. The first one is: 9 "Steps to get organic traffic" 10 A. Yes. 11 1458. Q. So, was that something you trained 12 the ICs on? 13 A. Yes. 14 1459. Q. "Key points of terms and 15 conditions" 16 What was that? 17 A. The Banners Broker International 18 website had terms and conditions. So, that would be 19 just reviewing that and making sure that they 20 understood. 21 1460. Q. Which was something that you did? 22 A. Sorry, train them on the terms and 23 condition	25 A. You wouldso, you go to S.R. Schlacht - 273 1 bannersbroker.com 2 1467. Q. Right. 3 Aand then there would be a login 4 page. As an affiliate, you would log in, and then 5 you would get into your back office. There is 6 different tabs for purchase, you know 7 1468. Q. Okay. 8 Adifferent things. I can't tell 9 you the tabs, I don't remember, but I would make 10 sure that the independent contractors knew the back 11 office front to back, so they knew. 12 1469. Q. Is it kind of like an account? 13 Like, a Banners Broker affiliate's account? 14 A. Yes. 15 1470. Q. Okay. And then you would similarly, just finishing off on the list, you had explained to 17 the independent contractors when you trained them, including in Sweden, on how to apply for the BB 19 Mastercard? 20 A. That is correct. 21 1471. Q. And how to distinguish between 22 notarized, non-notarized, and stan

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	Sheet 24 Page 90 S.R. Schlacht - 274		S.R. Schlacht - 276
1	I correct that the second day that you were in	1	that youpresumably you would go to Mr. Smith and
2	Sweden, yourself and Mr. Hooker trained these people	2	get clarification?
3	on the seven items that are bullet-pointed?		A. I wasn't paid to understand. I was
4	A. I trained on the support. David	4 5	just paid to make the changes.
5	Hooker was there to speak to the independent		1482. Q. But, again, in fairness, if he asked
6	contractors about compliance issues, because that	6	you to do something that you didn't understand
8	was his role. 1473. Q. Okay. And then finally, you had an	8	A. Yes, of course. If I needed
9	1473. Q. Okay. And then finally, you had an information session?	9	clarification, I would get it from him. 1483. Q. Okay. The next one is tab 45,
10	A. Yes.	10	1483. Q. Okay. The next one is tab 45, please. And I think this is a document that we need
11	1474. Q. And justcan you explain for me	111	to spend some time on. I know you will have read it
12	how thatwhat that consisted of and how it went?	12	in advance of today. This is an e-mail that is
13	A. So, that is what was David Hooker's	13	marked 100 percent confidential?
14	role. He was out there to talk about compliance and	14	A. Yes.
15	the business aspect for Banners Broker	15	1484. Q. And you are one of a limited number
16	International. So, that was his seminar.	16	of recipients?
17	1475. Q. Okay. Great. So, let's move on.	17	A. M'hmm.
18	Tab 43.	18	1485. Q. And it appears that it was written
19	A. Yes?	19	by Mr. Dixit, and the date is January 25, 2013?
20	1476. Q. And this is theI take itand	20	A. M'hmm.
22	you will tell me if I am wrong, that this is the withdrawal policy. And you will see it behind the	21	1486. Q. Do you recall receiving this?
23	blue sheet?	22	A. I was cc'd, and I was asked to just forward along to everyone. So, I do recall getting
24	A. Yes, that is correct.	23	it. So
25	1477. Q. So, as I read the cover e-mail, Mr.	25	1487. Q. Right.
_	Page 91		Page 93
	S.R. Schlacht - 275		S.R. Schlacht - 277
1	Smith is instructing you on January the 7th, 2013,	1	AI just followed the
2	to update it with the new language?	2	instructions
3	A. It would be, like, verblage. So, I	3	1488. Q. Okay.
4	was justin regards to this, I was editing any		Afrom Raj.
5	changes. So, Chris Smith told me what to change,	5	1489. Q. Okay.
6	and I changed it and then e-mailed it back. 1478. Q. Okay. So, looking at it, can		A. Anything in the e-mail, you would
8	1478. Q. Okay. So, looking at it, can youdo you recall, one way or the other, what it	8	have to talk to Raj about, because I was just 1490. Q. But you
9	is that you did to change this document?	9	1490. Q. But you Apassing it on.
10	A. I would have just made any changes	10	1491. Q. So, you received it. Presumably you
11	that they requested. I couldn'tit has been so	11	read it, as well?
12	long, I couldn't tell you the exact edits I made.	12	A. I probablyI got a lot of e-mails.
13	1479. Q. "They" being Mr. Smith and Mr.	13	I can't say I read the whole thing. If I was just
14	Dixit?	14	asked to send it along, I might have just sent it
145	A. Mr. Smith. Mr. Smith was the only	15	along. I wasn't an executive. I was just an
15			
16	one that could authorize changes in regards to	16	assistant.
16 17	one that could authorize changes in regards to Banners Broker International.	16 17	1492. Q. Well, he says to you:
16 17 18	one that could authorize changes in regards to Banners Broker International. 1480. Q. I am just intrigued by the use of	16 17 18	1492. Q. Well, he says to you: "Stephanie, please, can you indicate
16 17 18 19	one that could authorize changes in regards to Banners Broker International. 1480. Q. I am just intrigued by the use of the word "update". Can you tell me why this needed	16 17 18 19	1492. Q. Well, he says to you: "Stephanie, please, can you indicate this to everyone?"
16 17 18 19 20	one that could authorize changes in regards to Banners Broker International. 1480. Q. I am just intrigued by the use of the word "update". Can you tell me why this needed updating, or what you were updating?	16 17 18 19 20	1492. Q. Well, he says to you: "Stephanie, please, can you indicate this to everyone?" A. M'hmm.
16 17 18 19 20 21	one that could authorize changes in regards to Banners Broker International. 1480. Q. I am just intrigued by the use of the word "update". Can you tell me why this needed updating, or what you were updating? A. I can't recall. I would have just	16 17 18 19 20 21	 1492. Q. Well, he says to you: "Stephanie, please, can you indicate this to everyone?" A. M'hmm. 1493. Q. Who is everyone?
16 17 18 19 20 21 22	one that could authorize changes in regards to Banners Broker International. 1480. Q. I am just intrigued by the use of the word "update". Can you tell me why this needed updating, or what you were updating? A. I can't recall. I would have just been given a list of things to change, and then make	16 17 18 19 20 21 22	 1492. Q. Well, he says to you: "Stephanie, please, can you indicate this to everyone?" A. M'hmm. 1493. Q. Who is everyone? A. Like I said, this is a few years
16 17 18 19 20 21 22 23	one that could authorize changes in regards to Banners Broker International. 1480. Q. I am just intrigued by the use of the word "update". Can you tell me why this needed updating, or what you were updating? A. I can't recall. I would have just been given a list of things to change, and then make those changes.	16 17 18 19 20 21 22 23	 1492. Q. Well, he says to you: "Stephanie, please, can you indicate this to everyone?" A. M'hmm. 1493. Q. Who is everyone? A. Like I said, this is a few years ago, so I don't know who everyone would have been.
16 17 18 19 20 21 22	one that could authorize changes in regards to Banners Broker International. 1480. Q. I am just intrigued by the use of the word "update". Can you tell me why this needed updating, or what you were updating? A. I can't recall. I would have just been given a list of things to change, and then make those changes.	16 17 18 19 20 21 22	 1492. Q. Well, he says to you: "Stephanie, please, can you indicate this to everyone?" A. M'hmm. 1493. Q. Who is everyone? A. Like I said, this is a few years

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_	Sheet 25 Page 94		Page 96	50
	Sheet 25 Page 94 S.R. Schlacht - 278		S.R. Schlacht - 280	
1	give you a chance to read this more carefully. It	1	executive?	
2	looks like what Raj is asking you to communicate to	23	A. I was an assistant, and if something	
4	everyone is the date of the meeting. A. I don't		was asked to be forwarded along, I just followed instructions. I wasn't snoopy, so I didn't read	
5	1495. Q. February 5th or 6th, but the actual	4	every word ofif I asked to forward it on,	
6	e-mail was addressed to yourself. You were not just		generally I would just forward it on.	
7	copied on it.	67	1507. Q. Okay. So, this, just so we are	
8	A. It was addressed to everybody.	8	clear, was addressed to yourself and some others	
9	1496. Q. Right. And	9	A. Okay.	
10	A. Sorry, I didn't read it properly. 1497. Qare these people that it is	10	1508. Qand it is an interesting e-mail,	
11	1497. Qare these people that it is addressed to, are theyI have seen them described	11	that we do need to go through.	
13	as the executive team. Have you heard that	13	A. Okay. 1509. Q. So, it starts on the second page.	
14	expression before?	14	And at the bottom of the second page, Mr. Dixit is	
15	A. I have heard that expression before,	15	referring to current challenges that most of you	
16	but I would have to look at everybody.	16	will know, and some changes that are being made.	
17	1498. Q. Okay.	17	A. It would probably be best if you	
18	A. I wouldn't call everyone on here	18	just asked Mr. Dixit himself, because I don't want	
19 20	MS. DOSANJH: Sorry, does it say "executive team" in the document?	19	to answer anything because he is the author of it,	
20	1499. MR. WARD: I think that it does. I am	20	and I was a recipient along with many other	
22	just trying to find it.	22	people 1510. Q. Yes, and I	
23	MS. DOŠANJH: Okay.	23	A. It probably would be best to ask	
24	THE DEPONENT: No, it says "executive	24	him.	
25	meeting".	25	1511. Q. I am not going to ask you what he	
	Page 95		Page 97	
1	S.R. Schlacht - 279 1500. MR. WARD: All right.		S.R. Schlacht - 281	
2	1500. MR. WARD: All right. MS. DOSANJH: I think the last paragraph	2	intended, okay? But I do need to ask you what you understood.	
3	says:		A. Okay, ask your questions.	
4	"Fifth executive meeting"	4	1512. Q. Okay?	
5	1501. MR. WARD: Right.	5	A. I will answer them to	
6	THE DEPONENT: It would probably be	6	1513. Q. Okay.	
	bestI wouldn't be ableI don't know.		Athe best of my ability.	
89	This is a long time ago.	8	1514. Q. Did you understand Banners Broker to	
10	BY MR. WARD:	10	be facing current challenges as at January 25th, 2013, when this e-mail was sent around to the	
11	1502. Q. Did you attend executive meetings?	111	executive?	
12	A. Most of them.	12	A. Banners Broker International, I know	
13	1503. Q. And, so, things that were sent to	13	there waslet me read it. Banners Broker	
14	the executive, you received?	14	Internationaland I couldn't tell you the	
15 16	A. Things that were sent to executives,	15	specifics of the issues. But, yes, otherI can	
17	I received? 1504. Q. Yes.	16	read it, and maybe if we 1515. Q. Well, again, I don't want to dissect	
18	A. Can you	18	this, and I am not asking you to interpret it	
19	1505. Q. Well, this is an example of a	19	A. Yes.	
20	document that is marked "100 percent	20	1516. Qbut, I mean, this is an unusual	
21	confidential"	21	e-mail for a couple of reasons.	
22	A. Yes.	22	A. Okay.	
1 1 1 1	1506. Qin respect of an executive	23	1517. Q. One, it is marked 100 percent	
23				
23 24 25	meeting. So, my question is, did you receive confidential information that was provided to the	24 25	confidential; two, it goes to the executive team. A. Yes.	

	Sheet 26 Page 98		Page 100
	S.R. Schlacht - 282		S.R. Schlacht - 284
1	1518. Q. Three, it is talking about	1	you say, I am going to assume that it is to the best
2	fundamental changes to the business.	2	of your knowledge, and it is what you can remember.
3	A. Yes.	23	A. Trust me, if I could remember, I
4	1519. Q. It also refers to challenges, and	4	would tell you, so I could
5	portions of it are in all caps	5	1530. Q. No, I know
6	A. Yes, but	6	Ago father.
7			
	1520. Q. And so		
8	Ait would be best to ask Raj. He	8	answers by saying
9	wrote it. Like, I don't know what you want me to	9	A. But he would be the one to ask. He
10	answer.	10	would be able to tell you. He wrote it. I don't
11	1521. Q. Well, I just want to get your	11	remember. I don't know. Maybe I didn't do my job
12	understanding, as executive assistant at the time,	12	100 percent, and I didn't pay attention to every
13	what the situation was as at Banners Broker	13	detail.
14	A. I don't remember. Like, I	14	1532. Q. Okay.
15	don'tdo you want me to take a half an hour to	15	A. I don't remember.
16	read it and	16	1533. Q. I am just saying that I am going to
17	1522. Q. We are going to	17	assume that you what you don't remember, you won't
18	Adigest it?	18	tell me. So, you don't need to preface your answers
19	1523. Q. We do need to go through the e-mail.	19	by saying, "To the best of my knowledge".
20	And, again, it would help if I can get my questions	20	A. Okay. Then I will just say
21	on the record before you answer. But as at the time	21	1534. Q. Okay?
22	that you received this	22	A
23	A. Can you ask specific questions to do	23	1535. Q. You can if you wish
23	with specific things in the e-mail, and that will	24	A. Okay, then, now I will just say I
25	make it easier for me?	25	don't remember, and then that is done answering.
L			
	Page 99 S.R. Schlacht - 283		Page 101 S.R. Schlacht - 285
1		4	
			1536. Q. If you truly don't remember
2	you.	2	A. I don't remember.
3	A. Okay.	3	1537. Qthen
4	1525. Q. So, let's do that. So, I am at the	4	A. Like it says right here:
5	bottom of page 2.	5	"Fifth, traffic packs must be sold as
6	A. Yes.	6	they were intended"
7	1526. Q. And, again, I am not asking you what	7	Yes, at the time I know what traffic packs are, but
8	Mr. Dixit meant when he wrote this, but the bottom	8	I can't remember
9	of page 2, he is describing some current challenges	9	1538. Q. I am not taking you to those
10	that the company is facing, that are going to be	10	details. You asked me to direct you to a
11	dealt with at this pending executive meeting.	11	specific
12	A. Okay.	12	A. At the time, I would have been aware
13	1527. Q. So, did you have an appreciation at	13	that there were issues.
14	the time as to what those challenges were?	14	1539. MR. WARD: Let's take a break. Off the
15	A. I am sure I would have known. I am	15	record.
16	sure I would have known what thebut I didn't know	16	
		17	A BRIEF RECESS
17			
17	details. I was an assistant. 1528. Q. So, as a general matter, what was	18	
18	1528. Q. So, as a general matter, what was	18	STEPHANIE B. SCHLACHT resumed
18 19	1528. Q. So, as a general matter, what was the challenges that you appreciated as existing as	19	STEPHANIE R. SCHLACHT, resumed
18 19 20	1528. Q. So, as a general matter, what was the challenges that you appreciated as existing as at that time?	19 20	CONTINUED EXAMINATION BY MR. WARD:
18 19 20 21	1528. Q. So, as a general matter, what was the challenges that you appreciated as existing as at that time? A. To my knowledge and what I can	19 20 21	CONTINUED EXAMINATION BY MR. WARD: 1540. Q. So, Stephanie, we are still in tab
18 19 20 21 22	 1528. Q. So, as a general matter, what was the challenges that you appreciated as existing as at that time? A. To my knowledge and what I can remember, I think this had to do with compliance 	19 20 21 22	CONTINUED EXAMINATION BY MR. WARD: 1540. Q. So, Stephanie, we are still in tab 45, which is the e-mail to the executive team.
18 19 20 21 22 23	 1528. Q. So, as a general matter, what was the challenges that you appreciated as existing as at that time? A. To my knowledge and what I can remember, I think this had to do with compliance issues, but I couldn't be certain. You would have 	19 20 21 22 23	CONTINUED EXAMINATION BY MR. WARD: 1540. Q. So, Stephanie, we are still in tab 45, which is the e-mail to the executive team. A. Yes.
18 19 20 21 22	 1528. Q. So, as a general matter, what was the challenges that you appreciated as existing as at that time? A. To my knowledge and what I can remember, I think this had to do with compliance 	19 20 21 22	CONTINUED EXAMINATION BY MR. WARD: 1540. Q. So, Stephanie, we are still in tab 45, which is the e-mail to the executive team.

			5 104	С
	Sheet 27 Page 102 S.R. Schlacht - 286		S.R. Schlacht - 288	
1	third-last paragraph:	1	some compliance issues, he no longer wanted or could	
2	"Recent events have made the need to	12	have that role. So, that is when he kind of went	
3	clean up our house and implement these	23	into the support aspect. I started when the support	
			aspect was happening. So, I can't really answer	
4	changes an immediate task"		aspect was nappening. Su, i can the any answer	
5	So, it is in that context that I am asking you, what	4 5 6 7	anything before that, but I know that that was the	
6	was your understanding of the challenges that the		case. So, people were getting confused, because	
7	company was facing at that time?		Banners Broker Limited used to be a reseller, and	
8	A. It is my understanding, and just	8	then just changed to just doing consulting and	
9	going on how I understood it, looking back, because	9	support, that is why people got confused.	
10	I am sure at the time I fully understood what was	10	1549. Q. Okay. So, I take it that change in	
11	going on, is that affiliates werethere were	11	Raj's role wasn't clear to people that dealt with	
12	certain things in the program that were meant to be	12	the company?	
13	done a certain way, but affiliates were going in and	13	A. I couldn't really answer that yes or	
14	kind of, like, doing things their own way, which	14	no, but that is how I felt.	
15	wasn't compliant with the program. So, David Hooker	15	1550. Q. Okay. And just to that point, I	
16	was in charge of compliance. So, the reason why he	16	understand, and it is what Raj said in the e-mail,	
17	was brought on board was because the affiliates were	17	that he publicly had the title of chief operating	
18	kind of like loose cowboys doing their own things,	18	officer of Banners Broker International right up	
19	making up their own rules, and it was having a	19	until	
20	negative backlash on Banners Broker International.	20	A. Sorry, can you repeat that?	
21	1542. Q. Okay.	21	1551. Q. Just to the discussion that we were	
22	A. So, that is what I believe is	22	having about people confusing Banners Broker and	
23	1543. Q. Ókay.	23	Stellar Point, do you see, on the second-last page	
24	A. Sorry, let me turn my phone off.	24	of the production, there is a paragraph where Mr.	
25	Sorry.	25	Dixit is talking about the change in his title?	
	Page 103			_
	raye ivo		Page 105	_
	S.R. Schlacht - 287		Page 105 S.R. Schlacht - 289	٦
1	S.R. Schlacht - 287	1	S.R. Schlacht - 289	
1 2	S.R. Schlacht - 287 1544. Q. So, sitting here now, looking back	1	S.R. Schlacht - 289	
1	S.R. Schlacht - 287 1544. Q. So, sitting here now, looking back on it, you believe that those were some of the	1 2 3	S.R. Schlacht - 289 A. I believe, and I am only speaking fromthat was before I worked there. Like, when I	
1 2 3 4	S.R. Schlacht - 287 1544. Q. So, sitting here now, looking back	1 2 3 4	S.R. Schlacht - 289 A. I believe, and I am only speaking fromthat was before I worked there. Like, when I worked with Stellar Point, his role was just Stellar	
1 2 3	S.R. Schlacht - 287 1544. Q. So, sitting here now, looking back on it, you believe that those were some of the challenges that the company was facing? A. That is correct.	1 2 3	S.R. Schlacht - 289 A. I believe, and I am only speaking fromthat was before I worked there. Like, when I worked with Stellar Point, his role was just Stellar Point. So, I am not sure, but I do know that he	
1 2 3 4 5	S.R. Schlacht - 287 1544. Q. So, sitting here now, looking back on it, you believe that those were some of the challenges that the company was facing? A. That is correct.	1 2 3 4 5	S.R. Schlacht - 289 A. I believe, and I am only speaking fromthat was before I worked there. Like, when I worked with Stellar Point, his role was just Stellar Point. So, I am not sure, but I do know that he used to speaksorry.	
1 2 3 4	S.R. Schlacht - 287 1544. Q. So, sitting here now, looking back on it, you believe that those were some of the challenges that the company was facing? A. That is correct. 1545. Q. Were there any others that you wanted to mention?	1 2 3 4	S.R. Schlacht - 289 A. I believe, and I am only speaking fromthat was before I worked there. Like, when I worked with Stellar Point, his role was just Stellar Point. So, I am not sure, but I do know that he used to speaksorry. 1552. Q. Okay.	
1 2 3 4 5 6 7	S.R. Schlacht - 287 1544. Q. So, sitting here now, looking back on it, you believe that those were some of the challenges that the company was facing? A. That is correct. 1545. Q. Were there any others that you wanted to mention? A. I am trying to think of when the	1 2 3 4 5 6 7	S.R. Schlacht - 289 A. I believe, and I am only speaking fromthat was before I worked there. Like, when I worked with Stellar Point, his role was just Stellar Point. So, I am not sure, but I do know that he used to speaksorry.	
1 2 3 4 5 6 7 8	S.R. Schlacht - 287 1544. Q. So, sitting here now, looking back on it, you believe that those were some of the challenges that the company was facing? A. That is correct. 1545. Q. Were there any others that you wanted to mention? A. I am trying to think of when the timelinecan I just take a second to read?	1 2 3 4 5 6 7 8	S.R. Schlacht - 289 A. I believe, and I am only speaking fromthat was before I worked there. Like, when I worked with Stellar Point, his role was just Stellar Point. So, I am not sure, but I do know that he used to speaksorry. 1552. Q. Okay. A. He used to be referred to as the COO of Banners Broker International.	
1 2 3 4 5 6 7 8 9	S.R. Schlacht - 287 1544. Q. So, sitting here now, looking back on it, you believe that those were some of the challenges that the company was facing? A. That is correct. 1545. Q. Were there any others that you wanted to mention? A. I am trying to think of when the timelinecan I just take a second to read? 1546. Q. Yes, by all means.	1 2 3 4 5 6 7 8 9	S.R. Schlacht - 289 A. I believe, and I am only speaking fromthat was before I worked there. Like, when I worked with Stellar Point, his role was just Stellar Point. So, I am not sure, but I do know that he used to speaksorry. 1552. Q. Okay. A. He used to be referred to as the COO of Banners Broker International. 1553. Q. Right, and I mean, I think that is	
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24 1567. Q. Okay. 24 guys know, Banners Broker International obviously,	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 3 14 5 16 17 10 10 10 10 10 10 10 10 10 10 10 10 10	S.R. Schlacht - 291 There is a discussion in this e-mail, and this is an important e-mail, so forgive me for spending some time on it, but it says: "Stellar Point offices worldwide will not have brand ambassadors, and will not host public information sessions" But then it goes on to say that there are still going to be webinars and things like that. A. Yes. 1565. Q. So, just starting with the brand ambassador's aspect of it, remind me, because I don't think we have discussed it, but a brand ambassador, where did they fit into the Stellar Point terminology? A. It is not a Stellar Point terminology. Brand ambassador would have been, like, someone who promoted Banners Broker that worked for Banners Broker International. We used to host them out of Stellar Point, out of offices 1566. Q. I see. AbutI don't know, but they	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Page 109	
25 A. So. Lorenzo Guarini would have been 125 like, they didn't give back a lot of money to	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 12 12 14 15 16 17 10 10 10 10 10 10 10 10 10 10 10 10 10	S.R. Schlacht - 291 There is a discussion in this e-mail, and this is an important e-mail, so forgive me for spending some time on it, but it says: "Stellar Point offices worldwide will not have brand ambassadors, and will not host public information sessions" But then it goes on to say that there are still going to be webinars and things like that. A. Yes. 1565. Q. So, just starting with the brand ambassador's aspect of it, remind me, because I don't think we have discussed it, but a brand ambassador, where did they fit into the Stellar Point terminology? A. It is not a Stellar Point terminology. Brand ambassador would have been, like, someone who promoted Banners Broker that worked for Banners Broker International. We used to host them out of Stellar Point, out of offices 1566. Q. I see. AbutI don't know, but they chose notthey didn't wantStellar Point didn't	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Page 109	
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	1 2 3 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 21 12 23 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 14 5 16 7 8 9 0 11 12 13 14 5 16 17 10 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	S.R. Schlacht - 291 There is a discussion in this e-mail, and this is an important e-mail, so forgive me for spending some time on it, but it says: "Stellar Point offices worldwide will not have brand ambassadors, and will not host public information sessions" But then it goes on to say that there are still going to be webinars and things like that. A. Yes. 1565. Q. So, just starting with the brand ambassador's aspect of it, remind me, because I don't think we have discussed it, but a brand ambassador, where did they fit into the Stellar Point terminology? A. It is not a Stellar Point terminology. Brand ambassador would have been, like, someone who promoted Banners Broker that worked for Banners Broker International. We used to host them out of Stellar Point, out of offices 1566. Q. I see. AbutI don't know, but they chose notthey didn't wantStellar Point didn't want to have that responsibility anymore. 1567. Q. Okay.	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	 Page 109	

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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 21 20 21 22	 Sheet 29 Page 110 S.R. Schlacht - 294 people. You know, it is common knowledge now, and it wasI can't say it is January, but coming along those months, Chris wasn't doing payouts regularly, and it was having a negative backlash on Stellar Point. 1576. Q. Okay. And that negative backlash, presumably, wasyou would see that on the Internet? A. I never sourced the Internet for that, but Rajor Stellar Point was having a hard time getting new clients, because as soon as they Googled Stellar Point, negative stuff about Banners Broker came up, and then obviously it killed 1577. Q. Okay. Athe clients. 1578. Q. And similarly, did the independent contractors that you liaised with, did they share your concerns about negative backlash? A. That wouldn't be something that they would share with me. 1579. Q. Who would they share that with, if not yourself? Because I am just thinking of the 	1 2 3 4 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 10 11 21 20 21 22	 Page 112 S.R. Schlacht - 296 This is one of the reasons why I understood you, Stephanie, to be on the executive team A. Yes. 1584. Qbecause you had a BB e-mail address? A. Everyone had a BB e-mail address to start, because Banners Broker Limitedbut because weBanners Broker Limited had a name change, not a complete new company, right? 1585. Q. Yes. A. So, when we were formerly known as Stellar Point, all the e-mails changed to Stellar Point. I think there was a few of usbecause I dealt withI think I had to keep my other one for a little bit. Because I dealt with Chris a lot 1586. Q. Right, so you kept your Banners Broker e-mail address? A. For a little bit, but eventually it was taken away, and I just used my Stellar Point. 1587. Q. Okay. A. But at this time, I think I was still using my BB one.
23 24 25	A. If they had a concern, they wouldn'tlike, usually, if it came to stuff like	23 24 25	1588. Q. And the other executive team members also were using their BB e-mail address? They continued on?
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 4 5 10 11 12 3 4 5 10 11 12 3 4 5 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 7 10 10 10 10 10 10 10 10 10 10 10 10 10	 S.R. Schlacht - 295 that outside of commission payments, they would just say, "I need to talk to Chris directly", or, "I need to set up a meeting", and then I would set up the meeting, and they would discuss this. 1580. Q. Right. A. I was neverI didn't pass alonglike, I passed alonglike, if there was something they needed to talk about that wasyou know? Confidential, but more of, like, alike, I wasn't the one that passed on the specific information necessarily. If they wanted to talk to Chris, I would set up a time for them to talk, and then he would speak to them. 1581. Q. Right. A. My main job was just support, training, and making sure they got their commission payouts. 1582. Q. And just the very next paragraph, moving through the e-mail: "All Stellar Point employees must, by Monday, have a stellarpoint.ca e-mail 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Page 113 S.R. Schlacht - 297 A. I don't know how long they would haveChris always used a BB e-mail address. 1589. Q. Okay. Well, we can check that, so A. Yes, I am not sure. 1590. Q. And just the public information sessions that Stellar Point decided you would no longer hold A. Yes? 1591. Qwhat were they? Like, we have talked about training sessions, we have talked about conventions. What was the public information session? A. The public information session was when someoneyou know when you want to promote a program with someone, you would be likeI don't know if you are aware of MLM type businesses. 1592. Q. No. A. You would get invited to an information session. So, kind oflet's put Avon.
22 23 24 25	address" A. Yes. 1583. Q. "Chris and I need the BB e-mail addresses for the executive team"	22 23 24 25	A. Avon would have information sessions about their product, and then they would try to get people to sign up. Same thing. 1594. Q. So, let's putinstead of Avon,

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	Sheet 30 Page 114 S.R. Schlacht - 298	7/	. Page 116 S.R. Schlacht - 300
1	let's talk about Banners Broker.	1	A. Yes.
23	A. Okay. 1595. Q. What sort of information sessions	23	1605. Q. I mean, I thought that the Stellar Point isthe service provider was responsible for
4	did Stellar Point have for Banners Broker?	4	the things that we looked at, for instance website
5	A. Stellar Point, they would just have	5	
7	them at the location, the Stellar Point offices, because it was a big warehouse.		A. They were. 1606. Qthe tools
8	1596. Q. I see.	8	A. Sorry, they were, but all
9	 A. But it would be people like Lorenzo Guarini or David Hooker that would actually do the 	9	instructions came from Chris Smith. 1607. Q. Okay.
11	seminars.	11	A. So, if Chris Smith made a mistake or
12 13	1597. Q. Okay. And they would do the seminars to potential new members?	12	didn't advise the programmers to do something, and a mistake happened, it fell on Chris Smith's
14	A. Ýes.	14	shoulders, not Stellar Point.
15 16	1598. Q. And they would beLorenzo would	15	1608. Q. Right. So, Chris Smith would
17	basically be pitching them on joining Banners Broker?	117	provide instructions to Stellar Point, is your evidence?
18	A. That is correct.	18	A. Yes.
19 20	1599. Q. I see, okay. I understand. And then just over the page, there is just a few more	19	1609. Q. And presumably, Stellar Point would seek instructions from Mr. Smith?
21	aspects of it that I wanted to deal with. There is	21	A. That is correct. When it came to
22 23	a paragraph that says: "Six, effective Monday, January 28th,	22	anything to do with Banners Broker International. 1610. Q. Yes, okay. The tab 47 of the binder
24	you can only do withdrawal request if you	24	has to do with some travel that strikes the receiver
25	have uploaded ID only"	25	as a little bit unusual, in that it seems to have
	S.R. Schlacht - 299		Page 117 S.R. Schlacht - 301
1	Do you know what Raj is talking about here?	1	been a charter jet to Tel Aviv
23	A. So, in the back office with Banners Broker International, people were creating,	23	A. Yes. 1611. Qin February 2013?
4	likeaffiliates were signing up under fake people,	4	A. That is correct.
56	or they would have two accounts. So, when the affiliate signed up, they had to upload their valid	5	1612. Q. And did you coordinate this trip, Stephanie?
7	ID to make sure it was an actual person.	7	A. What do you mean by "coordinate"?
89	1600. Q. Okay. A. So, when someone was trying to get	8	Like 1613. Q. Did you arrange the bookings and set
10	their commissions out, it needed to be going to the	10	the travel schedules and find the charterand just
11	actual person that owned that account. 1601. Q. Right. So, prior to this uploaded	11	organize it?
13	1601. Q. Right. So, prior to this uploaded ID requirement, people could cheat the system?	13	A. Yes, I did. 1614. Q. Okay. So, I would like to know a
14	A. When the program firstlike, by	14	bit about this trip, because
15 16	the time I was there, they were already implementing, like, more structuredbecause people	15 16	A. Sure. 1615. Qit isfrom what we can tell.
17	were cheating the system.	17	from the financial analysis we have done, it was
18 19	1602. Q. Right. A. Yes.	18 19	incredibly expensive. What was the purpose of the trip to Israel in February of 2013? And who went on
20	1603. Q. And the system they were cheating	20	the trip?
21 22	was the system that was managed by Stellar Point?	21 22	A. I would have to look.
23	A. Stellar Point never managed the system. It was always Banners Broker International.	22	1616. Q. Did you go on the trip? A. I did, yes.
24	1604. Q. Well, let's just be clear on what	24	1617. Q. And do you recall who was with you?
25	you mean and what I mean by the system?	25	A. I believe there was myself, there

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Sheet 31 Page 118 S.R. Schlacht - 302 was Raj, Chris, they both brought their families with them, and Grant, I think, came, and there may have been a few more, but those are the people that I can recall.	S.R. Schlacht - 304
 with them, and Grant, I think, came, and there may have been a few more, but those are the people that 	
3 have been a few more, but those are the people that	1 A. It says \$196,000.
3 have been a few more, but those are the people that	2 1629. Q. It is page number 2543.
4 I can recall	3 MS. DOSANJH: There is two, right?
	1 4 There is
5 1618. Q. And did you all travel together to	5 THE DEPONENT: There is 2543/1.
6 Israel on the charter jet?	6
7 A. We did.	7 BY MR. WARD:
8 1619. Q. And did you all return together from	8 1630. Q. Okay. Now, all of these
9 Israel on the charter jet?	9 MS. DOSANJH: One moment.
10 A. I don't know if everybody returned	10
11 on the charter jet, but	11 BY MR. WARD:
12 1620. Q. Okay. And how many hundreds of	12 1631. Qquotes, or the charter documents,
13 thousands of dollars did the charter jet cost?	13 are
A. I can't remember. I would have to	14 A. Okay.
15 see an invoice in front of me.	15 1632. Qseem to have been directed to
16 1621. Q. There is a chartif it helps, I	16 yourself and Mr. Dixit. I don't see Chris Smith's
17 can't tell if it is a quote, but there is a charter	17 name on
18 price document behind the same tab, that you are	18 A. We did bookingsfor anything to do
19 welcome	19 with Banners Broker International and travel,
20 A. These are just quotes. So, let me	
21 look closer. Yes, these two were just quotes. I am	
22 not sureI couldn't give you the exact number of 23 what was	
Page 119 Page 202	Page 121 005
S.R. Schlacht - 303	S.R. Schlacht - 305
1 be on this page here. 2 1623. Q. Right.	1 wasn't it the case that Stellar Point would spend
	2 what they thought was required to provide the
	3 services, and then
4 I don't know whether it was the final one, but if 5 you look at the bottom of the air charter service.	4 A. They would spend
	5 1634. Q. Just let me finish the question.
6 it has a price. But like I said, this isn't a	6 A. Sorry.
7 signed document, so I am not sure if this was the	7 1635. Q. And then you would get reimbursed
8 exact	8 from Chris Smith?
9 1624. Q. Okay.	9 A. That is correct.
10 Aone.	10 1636. Q. Okay. So, it wasn't the case that
	11 Mr. Smith would authorize in advance
11 1625. Q. But it was	12 A. Well, we
12 A. That was chosen.	
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S.R. Schlacht - 306 S.R. Schlacht - 306 1 would: S.R. Schlacht - 306 2 A. It would: beyes, fnal is what I Itsrael/Cyprus? 3 would: A. It would: beyes, fnal is what I 4 1633. O. Okay, 5 Ain regards to travel. 1653. 6 1640. O. Ckay, 7 A. That is all 1664. 8 1641. Q. So 9 Ahat I have the scope of It may comparized do you recall getting. Kin Smith 3 11 1642. O. So. with reference to this trip that 12 you organized do you recall getting. Kin Smith 3 13 approval for the \$200,000 expense? 14 A. Yes. 15 1643. O. Cay you tell me about that? 16 A. Well, the protocol that I had in 17 place would be. before anything of than tarde 18 needed and requirisment's do the independent contracting Mr. Smith and having a discussion or 22 Awhen the saw shere? 21 1644. O. But you you specifically recall 1645. O. Ukay. <th>-</th> <th>Sheet 32 Page 122</th> <th></th> <th>Page 124</th>	-	Sheet 32 Page 122		Page 124
2 A. It would beyes, that is what I 3 would 4 1639. Q. Okay. 5 A. in regards to travel. 3 6 1640. Q. Okay. 4 8 1641. Q. So 5 9 A.	4	S.R. Schlacht - 306		S.R. Schlacht - 308
4 1639. Q. Okay. 5 A.			1	
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Page 123S.R. Schlacht - 3071found any.2A.3on the phone, but I would have had to have confirmed4that with him.51646.Q.Okay.6A.7him himself.81647.9specifically recall confirming this with Mr. Smith?10A.111648.12that a charter was taken to Israel13A.141649.15A.1649.Q.1649.Q.1649.Q.1649.Q.1649.Q.1647.D.171649.18A.191651.1650.Q.171650.18A.191651.191651.191651.191651.191651.191651.191651.191651.191651.191651.191651.19101010101112131415151616171819191651.191651.191651.10101011 <td></td> <td>contacting Mr. Smith and having a discussion or</td> <td></td> <td></td>		contacting Mr. Smith and having a discussion or		
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23 1652. Q. And you are e-mailing Smith and 23 Point.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 on the phone, but I would have had to have confirmed that with him. 1646. Q. Okay. A. Or Raj would have confirmed it with him himself. 1647. Q. Okay. So, you don't personally, specifically recall confirming this with Mr. Smith? A. No, I don't remember. 1648. Q. Okay. And do you know why it was that a charter was taken to Israel A. I am not sure 1649. Qas opposed to a commercial? A. I just did the booking. You would have to ask Mr. Smith, or Mr. Dixit. 1650. Q. But you didn't ask at the time? A. It was none of my business. 1651. Q. Okay. And then did youjust over the page, because I am on to the next production, Stephanie. It is 48? 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 1661. Q. Okay. AI wouldn't be able to tell you if Raj had anynot to my knowledge. 1662. Q. Okay. Did you ever personally have any dealings with the Bank of Cyprus? A. No. 1663. Q. Or have a credit card from the Bank of Cyprus? A. I do, but it has nothing to do with Banners Broker. 1664. Q. So, you have an accountjust so I am clear, and if you tell me that it has nothing to do with Banners Broker, I will need to accept that, but you have a bank at the Bank of Cyprus that has nothing to do with Banners Broker? A. No, it was created long after I worked for Stellar Point. 1665. Q. Whyso, tell me why that has nothing to do with Banners Broker or Stellar Point? A. M I allowed to have bank accounts?
24 Grant and Hardowa 24 1666. Q. Did you set that account up, or did	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 on the phone, but I would have had to have confirmed that with him. 1646. Q. Okay. A. Or Raj would have confirmed it with him himself. 1647. Q. Okay. So, you don't personally, specifically recall confirming this with Mr. Smith? A. No, I don't remember. 1648. Q. Okay. And do you know why it was that a charter was taken to Israel A. I am not sure 1649. Qas opposed to a commercial? A. I just did the booking. You would have to ask Mr. Smith, or Mr. Dixit. 1650. Q. But you didn't ask at the time? A. It was none of my business. 1651. Q. Okay. And then did youjust over the page, because I am on to the next production, Stephanie. It is 48? A. Yes. 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 1661. Q. Okay. AI wouldn't be able to tell you if Raj had anynot to my knowledge. 1662. Q. Okay. Did you ever personally have any dealings with the Bank of Cyprus? A. No. 1663. Q. Or have a credit card from the Bank of Cyprus? A. I do, but it has nothing to do with Banners Broker. 1664. Q. So, you have an accountjust so I am clear, and if you tell me that it has nothing to do with Banners Broker, I will need to accept that, but you have a bank at the Bank of Cyprus that has nothing to do with Banners Broker? A. No, it was created long after I worked for Stellar Point. 1665. Q. Whyso, tell me why that has nothing to do with Banners Broker or Stellar Point? A. M I allowed to have bank accounts? It has nothing to do with Banners Broker or Stellar
25 A. Yes. 25 somebody set it up for you?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 on the phone, but I would have had to have confirmed that with him. 1646. Q. Okay. A. Or Raj would have confirmed it with him himself. 1647. Q. Okay. So, you don't personally, specifically recall confirming this with Mr. Smith? A. No, I don't remember. 1648. Q. Okay. And do you know why it was that a charter was taken to Israel A. I am not sure 1649. Qas opposed to a commercial? A. I just did the booking. You would have to ask Mr. Smith, or Mr. Dixit. 1650. Q. But you didn't ask at the time? A. It was none of my business. 1651. Q. Okay. And then did youjust over the page, because I am on to the next production, Stephanie. It is 48? A. Yes. 1652. Q. And you are e-mailing Smith and Grant and Hardowa 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 1661. Q. Okay. AI wouldn't be able to tell you if Raj had anynot to my knowledge. 1662. Q. Okay. Did you ever personally have any dealings with the Bank of Cyprus? A. No. 1663. Q. Or have a credit card from the Bank of Cyprus? A. I do, but it has nothing to do with Banners Broker. 1664. Q. So, you have an accountjust so I am clear, and if you tell me that it has nothing to do with Banners Broker, I will need to accept that, but you have a bank at the Bank of Cyprus that has nothing to do with Banners Broker? A. No, it was created long after I worked for Stellar Point. 1665. Q. Whyso, tell me why that has nothing to do with Banners Broker or Stellar Point? A. Am I allowed to have bank accounts? It has nothing to do with Banners Broker or Stellar Point. 1666. Q. Did you set that account up, or did

sue	et 33 Page 126 S.R. Schlacht - 310		Page 128	S.R. Schlacht - 312
4	A It had nothing to do with Dappore	1	1673.	
	A. It had nothing to do with Banners	2	10/0.	
2	Broker, so I don't feel comfortable answering		4074	A. Sorry.
	67. Q. Just with a view to exploring that,	3	1674.	Q. Where the affiliates' contributions
4	I would like to know whether you set that up, or	4	may	have ended up.
5	somebody else set it up for you.	5		A. Okay.
6	A. It has nothing to do with Banners	6	1675.	Q. And, so, that isand there are
7	Broker or Stellar Point, and it was created far	1 7		cations that money is in Cyprus. So
8	after I worked for Stellar Point or had anything to	8	intoite	A. Okay, fair enough. Can I answer?
9		9	1676.	
	do with Banners Broker, so it is really none of your	1 10		Q. So, we are intrigued by the fact
10	business.	10	that	you have an account there.
	68. Q. Okay. So, I will take that as a	11		A. I do have an account there. No
12	refusal.	12	mon	eyall the companies that you listed in the
13	A. Well, how else do you	13	front	t of the binder that are being investigated, no
14	MS. DOSÁNJH: I think	14	mon	ey has ever come in from those sources. It is n
15	THE DEPONENT: It is not a refusal.	15	acco	
16	MS. DOSANJH:in fairness	16	1677.	
10			1077.	
17	THE DEPONENT: It has nothing to do	17		MS. DOSANJH: So, maybe you want to
18	MS. DOSANJH:to the question, I	18		say
19	think what herwhat she means by that is,	19	1678.	MR. WARD: Well, we are
20	I think the purpose of the questioning, or	20		MS. DOSANJH: Where any of the sources,
21	the examination here, is with respect to	21		the source of funds
22	Banners Broker, and I think if something	22	1679.	MR. WARD: Well
23	wasI think it is her view thatI	23	1070.	MS. DOSANJH:with respect to the
24		23		
	wouldn't say it is a refusal. I think her	24	4000	investigation that is ongoing.
25	view is that if it was created after the	25	1680.	MR. WARD: Yes, you know what? Thank
Pag	e 127		Page 129	
	S.R. Schlacht - 311			S.R. Schlacht - 313
1	fact, then it really doesn't involve			you for that. Fortunately, we have a book
2 3	anything with respect to the line of	2		of financial documents that we are going to
3	questioning of Banners Broker. I mean,	3		have to get to at some point.
4	that is how I would take it, but I meanI	4		MS. DOŠANJH: Okay.
5	don't think	5	1681.	MR. WARD: And, so, we can explore that
6 16	69. MR. WARD: I mean	6	1001.	a little further.
7 10				
1	MS. DOSANJH: She is not refusing. I			THE DEPONENT: That is fine.
8	think she is just saying that	8		
	70. MR. WARD: Right, well	9	BY MR. V	
10	MS. DOSANJH:"Listen, what is the	10	1682.	Q. All right. And perhaps we can have
11	relevance here?"	11	a loo	k at tab 50 of the binder. This is an e-mail
	71. MR. WARD: Okay. Then give me a chance	12		sage from Rajiv to I am not sure who it is.
13	to review to explain that. The receiver	13		be you can tell me, but
14		14	iviayi	A. Anna.
	has investigatory powers that go beyond		1000	
15	Banners Broker, and specifically inclue	15	1683.	QAnna
16	Stellar Point and Dixit Holdings and other	16		A. Onofre.
17	companies. And part of what we are doing	17	1684.	Q. Okay. And remind me, who was Anna
18	is a flow of funds analysis to	18		A. She was the reseller for India.
19	understand	19	1685.	Q. Okay. And you are copied on it,
20	THE DEPONENT: Okay.	20		n is why I am raising it with you.
			WHICH	A. Yes.
	72. MR. WARD:where	21		
22	THE DEPONENT: I think I can better	22	1686.	Q. It is dated March 2013. And there
23	answer your question, then. Can I try?	23		erence to a \$50,000 USD wire to Stellar Point
24		24	from	Dreamspace Ventures Limited
	MR. WARD:	25		A. Okay.
		11 20		A. Unay.

	el		Page 132 - 539
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22 23 24 25	 Sheet 34 Page 130 S.R. Schlacht - 314 1687. Qas a shareholders investment funding. A. Okay. 1688. Q. Do you know anything about Dreamscape Ventures Limited? A. No, I don't. 1689. Q. Have you ever heard of Dreamscape Ventures Limited before today? A. Well, I have received this e-mail. I have heard about it, but I don't know any of the details of the company. 1690. Q. What had you heard about it? A. I have seen it come up in e-mails, but I don't know anything about the able to answer anything about that. 1691. Q. Okay. And justwhen you say you have seen it come up in e-mails, in what context have you seen Dreamscape Ventures Limited come up in e-mails? A. I can't remember, but I am cc'd on this e-mail, so obviously I have seen that name before, but I don't know any specifics about the company. 1692. Q. Right. But do you know anything at 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 Page 132 S.R. Schlacht - 316 International, mainly, but I know that there was a few. I think they are listed here. 1699. Q. Now, can youin fairness, we understand the companies listed here to be related to Mr. Dixit. Can you name for me anycan you identify for me any Stellar Point clients that were not connected to your husband or A. I don't know any of these companies 1700. Q. Right. A. Like, my husband and I don't really discuss his business aspects. 1701. Q. Okay. So, without looking at this e-mail, I take it you wouldn't be able to identify for me any other Stellar Point customers, apart from Banners Broker? A. Well, these are all clients. 1702. Q. That is right, but you didn't have any dealings with them? A. No. 1703. Q. And I take it you don't know whether those clients are related to your husband or not? A. No, I do not. 1704. Q. Okay. Okay, then, tab 52. This is an e-mail that you appear to have authored with Mr.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23 24 25	 S.R. Schlacht - 315 all about the company? A. No. 1693. Q. Do you have any understanding as to why you would have been copied on this e-mail? A. Well, I was Rajiv's assistant, so I was copied on a lot of things. 1694. Q. So, I take it that he never asked you to do anything in relation to Dreamscape Ventures Limited that you can remember? A. No. 1695. Q. Tab 51, I am just wondering if you can help me out with this e-mail. A. Sure. 1696. Q. Subject is "Money Wires", and you are copied on it. It is between Smith and Dixit. A. Okay. 1697. Q. And part of it includes a description of Stellar Point? A. Yes. 1698. Q. Can you tell me, when you were at Stellar Point, apart from Banners Broker International, what other customers did Stellar Point have? A. They had a few. I didn't work with them. My focus was just Banners Broker 	$ \begin{array}{c} 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\\ 24\\ 25\\ \end{array} $	 Page 133 S.R. Schlacht - 317 Smith. A. M'hmm. 1705. Q. That is a yes? A. Yes, sorry. 1706. Q. Okay. A. Yes. 1707. Q. Paragraph 2 references an affiliate, and I just wanted to know what it was thatinstructions that you were seeking, or questions you had in relation to that affiliate, and what was the A. In paragraph 2? 1708. Q. Yes. A. This would have been large withdrawals. I wasn't responsible for that. That would have been Rachel. She assisted me. 1709. Q. And she assisted you in allowing affiliates to make large withdrawals? A. No. The large withdrawals were withdrawals that affiliates requested. She would simply take that information and pass it along to Chris, similar to what I did for the independent contractors 1710. Q. Right. Abut because I oversawlike,

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	Sheet 35 Page 134		Page 136	54
	Sheet 35 Page 134 S.R. Schlacht - 318		S.R. Schlacht - 32	
1	Rachel would come to me if there was questions. I		So, I can'tthis wasn't within my scope of job	
23	would often update Chris, but I didn't deal directly with the withdrawals.	23	description. 1718. Q. Okay. So, it wasn't within your	
4	1711. Q. Okay.		normalbut, I mean, you didn't have a job	
5	A. Just for the independent	4 5	description, in fairness, right?	
6	contractors.	6	A. Well, I did have a job description.	
7	1712. Q. Right. But Rachel assisted you?	7	But, yes, often I was asked to do things outside of	
8	Did she report to you?	8	that scope.	
9	A. I think technically she reported to	9	1719. Q. Okay.	
10	Raj, but often I would give her tasks. So, she	10	A. But I neverthis is just passing	
11	would often follow up with me. 1713. Q. Okay. So, given that, why was it	11	on information. 1720. Q. Well, let's just stop there for a	
13	that you were making this inquiry of Chris in	13	second, because, I mean, I honestly didn't think	
14	regards to a large withdrawal on behalf of an	14	that you had a formal job description. Did you hav	/e
15	affiliate?	15	something in writing?	Ū
16	A. Because Chris was really, really bad	16	A. When I first got hired, yes, and	
17	at getting back to people. Like, Rachel would	17	then when I moved on to be Raj Dixit's assistant, I	
18	e-mail him several times, and he just wouldn't	18	don't think another job description was drafted.	
19	answer. And Chris, I could bug him enough that he	19	1721. Q. Right. So, in fairness, isn't the	
20	would get back to me. So, often, if she couldn't	20	way to look at it that your job description was to	d
22	get a hold of him, she would say, "Steph, please. You know, I have been trying to get a hold of Chris,	21	do, as Mr. Dixit's personal assistant, what he aske you to do as his personal assistance?	u
23	and he is not answering. Can you follow up?"	23	A. That would be correct.	
24	1714. Q. Okay. So, to that extent, you would	24	1722. Q. Right. And, similarly, the same for	
25	assist Rachel in facilitating associate withdrawals?	25	Mr. Smith, right? You would	
	Page 135 S.R. Schlacht - 319][Page 137 C.D. Cobloobt 201	
1	A. Not facilitating it. If Rachel	4	S.R. Schlacht - 321 A. No.	
2	wasn't getting a hold of him, I would simply be,	2	1723. Q. You would	
3	like, "Chris, you need to get back to Rachel", and	3	A. Sorry.	
4	he would deal directly with her on that. I didn't	4	1724. Qrespond to Mr. Smith's questions,	
5	havethat wasn't my area.	5	and	
6	1715. Q. Okay. But in this case, maybe this	6	A. No, not necessarily. I only dealt	
/	is different, but you are saying:		with Mr. Smith when it came to independent	
8 9	"Please let me know how to move forward,	8	contractors, commissions, but becausesometime	5,
10	and how you would like the bank details or invoice sent to you"	10	it is hard to explain. Like, because I travel quite a bit, affiliates would somehow get my e-mail, or	
11	It seems to me that you were involved in dealing	11	someone would pass it on, and often I would get	
12	with this affiliate.	12	bugged.	
13	A. I was never involved directly with	13	1725. Q. I see.	
14	affiliates. Like I said, I often worked with	14	A. So, then, if it was something that I	
15	Rachel, but I don't know.	15	thought was important, I wouldn't ignore it.	
16	1716. Q. Because this isyou prepared this	16	Obviously, I would pass it along to Chris, but that	
17 18	e-mail, and Rachel is not even copied on it. A. No. I know.	17	wasn't my regular job description. But like I said,	
10 19	A. No, I know. 1717. Q. So, just	10	affiliates, they canif they get anyone's information, they will e-mail you over and over and	
20	A. Or it could have beenlike, if	20	over with things, but if it was out of my scopeI	
21	Chris would come on trips with us, often affiliates	21	worked just with training and independent	
22	would talk to him independently, and he may have	22	contractors. So, if there was an affiliate that was	
23	talked to an affiliate about something, and then	23	bugging me over and over and over, often I would	
	they may have found a way to bug me, and followed up	24	pass that message on to Chris, because I didn't wa	nt l
24 25	with me. I don't know. I am just following up.	25	to be bugged anymore.	

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	Sheet 36 Page 138		Page 140
	S.R. Schlacht - 322		S.R. Schlacht - 324
1	1726. Q. Okay.	1	1736. Q. Okay. So, who dictated?
2	A. So, if that answers that, that	12	A. I
3	would	2	1737. Q. You know, I take it you don't
4	1727. Q. Right. And, so, in this case, it	ĬĬĭ	recall, but
5	looksand you may know better than I do, but it	5	A. I don't.
6	looks like you passed the message on to Chris with	6	1738. Qyou drafted the note?
7	report to an affiliate, and you cought instructions		A. It would have beenyes, I did
8	respect to an affiliate, and you sought instructions	8	draft it.
9	on how to move forward with respect to an affiliate?		
	A. That is what it seems like, yes.		1739. Q. Okay. And then you provided it,
10	MS. DOSANJH: Do you mind if we take a	10	just following the e-mail, to Raj or Chris for
11	break?		approval?
12	1728. MR. WARD: Sure, let's take one. Off	12	A. Yes.
13	the record.	13	1740. Q. And to instruct if any changes need
14		14	to take place?
15	A BRIEF RECESS	15	A. If I needed to make any changes in
16		16	the e-mail.
17	STEPHANIE R. SCHLACHT, resumed	17	1741. Q. Right. And then furthermore, in
18	CONTINUED EXAMINATION BY MR. WARD:	18	your e-mail that we have in front of us, you told
19	1729. Q. Tab 53, what is ajust with	19	Sara, Johnny or Colin
20	reference to the terminology, "Dashboard"?	20	A. Yes.
21	A. Dashboard? Yes, when affiliates	21	1742. Qtoonce approved, to put it on
22	would go to www.bannersbroker.com, on the sign-in	22	the bannersbroker.com website?
23	page, that would be the dashboard. So, there would	23	A. Yes, so the affiliates could see it.
24	often be updates or events that were going on, but	24	1743. Q. Okay. And what isjust in terms
25	that was what is considered the dashboard.	25	of your note, what was the yearly convention that
20			er jedi netej inde nae jedinj contension and
L	Page 139		Page 141
	S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that		Page 141
1 2	S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted?	1 2	S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that
	S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that		S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that
1 2 3 4	S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that	1 2 3 4	S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few
1 2 3	S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May?	1 2 3	S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the
1 2 3 4 5	S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May?	1 2 3 4 5	S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large
1 2 3 4	S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May?	1 2 3 4	S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the
1 2 3 4 5 6	S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May? A. I don'tit would have beenit is	1 2 3 4 5 6	Page 141 S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large convention. 1744. Q. Right. And it was scaled back? Is
1 2 3 4 5 6 7 8 9	 S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May? A. I don'tit would have beenit is to do with 1732. Q. To do with the cancellation of a convention in Niagara? 	1 2 3 4 5 6 7	S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large convention. 1744. Q. Right. And it was scaled back? Is that what happened?
1 2 3 4 5 6 7 8	 S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May? A. I don'tit would have beenit is to do with 1732. Q. To do with the cancellation of a convention in Niagara? 	1 2 3 4 5 6 7 8	 Page 141 S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large convention. 1744. Q. Right. And it was scaled back? Is that what happened? A. It was scaled back, because Banners
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1 2 3 4 5 6 7 8 9 10 11	 Page 139 S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May? A. I don'tit would have beenit is to do with 1732. Q. To do with the cancellation of a convention in Niagara? A. Well, if it was Niagara, that never got cancelled, but if it was Niagara, it would 	1 2 3 4 5 6 7 8 9 10 11	 Page 141 S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large convention. 1744. Q. Right. And it was scaled back? Is that what happened? A. It was scaled back, because Banners
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1 2 3 4 5 6 7 8 9 10 11 12 13	 Page 139 S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May? A. I don'tit would have beenit is to do with 1732. Q. To do with the cancellation of a convention in Niagara? A. Well, if it was Niagara, that never got cancelled, but if it was Niagara, it would probably be May. 1733. Q. Okay. 	1 2 3 4 5 6 7 8 9 10 11 12 13	 Page 141 S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large convention. 1744. Q. Right. And it was scaled back? Is that what happened? A. It was scaled back, because Banners Broker International was having some issues. Like, I don'tChris wasn't able to pay the affiliates. I don't know the details about it. All I know is that there wasn't money to put on such a large
1 2 3 4 5 6 7 8 9 10 11 12 13 14	 Page 139 S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May? A. I don'tit would have beenit is to do with 1732. Q. To do with the cancellation of a convention in Niagara? A. Well, if it was Niagara, that never got cancelled, but if it was Niagara, it would probably be May. 1733. Q. Okay. A. But I can't be certain. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14	 Page 141 S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large convention. 1744. Q. Right. And it was scaled back? Is that what happened? A. It was scaled back, because Banners Broker International was having some issues. Like, I don'tChris wasn't able to pay the affiliates. I don't know the details about it. All I know is that there wasn't money to put on such a large scale.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	 Page 139 S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May? A. I don'tit would have beenit is to do with 1732. Q. To do with the cancellation of a convention in Niagara? A. Well, if it was Niagara, that never got cancelled, but if it was Niagara, it would probably be May. 1733. Q. Okay. A. But I can't be certain. 1734. Q. All right. So, have a look at the 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	 Page 141 S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large convention. 1744. Q. Right. And it was scaled back? Is that what happened? A. It was scaled back, because Banners Broker International was having some issues. Like, I don'tChris wasn't able to pay the affiliates. I don't know the details about it. All I know is that there wasn't money to put on such a large scale. 1745. Q. It says you wrote:
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Page 139 S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May? A. I don'tit would have beenit is to do with 1732. Q. To do with the cancellation of a convention in Niagara? A. Well, if it was Niagara, that never got cancelled, but if it was Niagara, it would probably be May. 1733. Q. Okay. A. But I can't be certain. 1734. Q. All right. So, have a look at the attachment to the e-mail. It is addressed, "To our 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Page 141 S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large convention. 1744. Q. Right. And it was scaled back? Is that what happened? A. It was scaled back, because Banners Broker International was having some issues. Like, I don'tChris wasn't able to pay the affiliates. I don't know the details about it. All I know is that there wasn't money to put on such a large scale. 1745. Q. It says you wrote: "An event of such grandeur"
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Page 139 S.R. Schlacht - 323 1730. Q. Okay. So, this is an e-mail that you drafted? A. Yes. 1731. Q. And it is sent out inis that March of 2013, or May? A. I don'tit would have beenit is to do with 1732. Q. To do with the cancellation of a convention in Niagara? A. Well, if it was Niagara, that never got cancelled, but if it was Niagara, it would probably be May. 1733. Q. Okay. A. But I can't be certain. 1734. Q. All right. So, have a look at the attachment to the e-mail. It is addressed, "To our Valued Affiliates". Did you write this note? 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Page 141 S.R. Schlacht - 325 was not to proceed as planned? A. Well, the first, in Portugal, that was the first big convention. There were a few small conventions, and then Niagara was to be the second annual convention, like the second large convention. 1744. Q. Right. And it was scaled back? Is that what happened? A. It was scaled back, because Banners Broker International was having some issues. Like, I don'tChris wasn't able to pay the affiliates. I don't know the details about it. All I know is that there wasn't money to put on such a large scale. 1745. Q. It says you wrote: "An event of such grandeur" A. Because it was meant to be, like, a
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10 1757. Q. Okay. And how did you learn that it 10 1768. Q. So, just rewind a little bit, I 11 had been cancelled? 11 don't know that I have seen that blog. I may have,	
11 had been cancelled? [11] don't know that I have seen that blog. I may have,	
12 A. I can't remember. It would have 12 because we have seen a lot of blogs, but what is the	
13 either been from Chris himself or from Raj. 13 blog that you are referring to?	
14 1758. Q. Okay. So, then, 55, tab 55 is 14 A. It is a blogI don't remember who	
15 another one, and it is just the second one in the 15 put it up. It was some guy in the U.K. It was just	
16 binder, but it is an e-mail that I consider to be a 16 talkingI couldn't even remember what was in it,	16 talkingI couldn't even remember what was in it,
17 little more significant than some of the others? 17 other than me, because	17 other than me, because
18 A. Yes. 18 1769. Q. Sure. What did it say about	
19 1759. Q. And just looking at the exchange, I [19 yourself?	
20 see from the e-mail at the very top of page 1 that 20 A. It said something because, in May, I	20 A It said something because in May I
21 when you received this from Chris, you wrote back to 21 gave my resignation, because I wanted to move hon	
	22 back to Vancouver and, you know, things with Banners
	Development in the second like to build see that align t
23 "I have some thoughts. Will discuss 23 Broker International, like, I could see that client	
24 with Raj" 24 relationship no longer existing, and there was just	
25 A. Yes. 25 a lot of stuff going on, and I wanted to move home	ם מחחים מעחיים המזימניו התפיימה המוחה דוונים זה זהו פייים איני ו

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	S.R. Schlacht - 330		S.R. Schlacht - 332
1	and be with my family, and I was dating someone at	1	really matter who wrote it, but that is
2	the time anyway. So, I wanted to move home, and	2 3 4	1778. Q. All right. In addition to yourself,
3	thenso, I put in my resignation with Raj and I	3	did the blog have comments regarding jets and
4	say, "You know, thank you for the opportunity. You	4	prostitutes?
5	know, had a great knowledge with working with you,	5	A. I believe there was something about
6	but it is time for me to move on". And then he	6	that.
7	convinced me to stay because he said Raj was,	7	1779. Q. If the blog still available? Like,
8	like, "You know, I know we are not going to have	8	where would we find it if we wanted to?
9	Banners Broker as a client anymore, but I really	9	A. I have no idea. It was
10	want to build my business, and you have been such a	10	1780. Q. Where was it posted?
11	good assistant, and I really want you to stay on".	111	A. I don't know. I was just given a
12	So, then I told him that I would stay on for another	12	copy and paste of it. I didn't want to even look
13	couple of months, and then there was the blog that	13	online. I didn't want to like, it made me that
14	went up saying the reason why I thought it was	14	upset that I just didn't want to because I had the
15	someone that had worked with us is because no one	15	personality that if I know it is up there and I know
16	else knew I was guitting, except for a couple of	16	where to find it
17	people.	117	1781. Q. Okay.
18	And then I went up on the blog saying, "Oh,	18	A I would look at it too much.
19	Stephanie tried to quit, and then, you know, they	19	1782. Q. So, have a look at tab 56, please.
20	convinced her to stay with a favourable salary and"	20	A. Yes?
21	something stupid, anyway. It just	21	1783. Q. Now, I want to take you to some
22	1770. Q. Right.	22	companies
23	A I am a private person, and it	23	A. Sure.
24	really upset me that I was publicly announced on a	24	1784. Qthat are identified in this
25	blog like that, and I felt like	25	account.
L			
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	S.R. Schlacht - 331		Page 149 S.R. Schlacht - 333
1	S.R. Schlacht - 331	1	S.R. Schlacht - 333 A. Yes?
1 2	S.R. Schlacht - 331	1	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI
1	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it?	1 2 3	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI
1 2 3 4	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it.	1	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions.
1 2 3	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it?	1 2 3	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give
1 2 3 4 5 6	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take	1 2 3 4 5	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give
1 2 3 4 5	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it?	1 2 3 4	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure.
1 2 3 4 5 6	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it? A. No, I don't know. 1773. Q. And do you think it was an	1 2 3 4 5	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give you is in some way connected to Stellar Point A. Okay.
1 2 3 4 5 6 7 8 9	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it? A. No, I don't know. 1773. Q. And do you think it was an independent contractor that you dealt with A. No.	1 2 3 4 5 6 7 8 9	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give you is in some way connected to Stellar Point A. Okay.
1 2 3 4 5 6 7 8 9 10	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it? A. No, I don't know. 1773. Q. And do you think it was an independent contractor that you dealt with A. No. 1774. Qthat might have learned that	1 2 3 4 5 6 7 8 9 10	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give you is in some way connected to Stellar Point A. Okay. 1787. Qif you know, and you may not know. A. Okay.
1 2 3 4 5 6 7 8 9 10 11	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it? A. No, I don't know. 1773. Q. And do you think it was an independent contractor that you dealt with A. No. 1774. Qthat might have learned that information?	1 2 3 4 5 6 7 8 9 10	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give you is in some way connected to Stellar Point A. Okay. 1787. Qif you know, and you may not know. A. Okay. 1788. Q. But secondly, and equally
1 2 3 4 5 6 7 8 9 10 11 12	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it? A. No, I don't know. 1773. Q. And do you think it was an independent contractor that you dealt with A. No. 1774. Qthat might have learned that	1 2 3 4 5 6 7 8 9 10 11 12	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give you is in some way connected to Stellar Point A. Okay. 1787. Qif you know, and you may not know. A. Okay.
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 2 2 3 4 5 6 7 8 9 20 11 2 2 3 4 5 6 7 8 9 20 11 2 2 8 9 10 11 2 2 10 11 2 2 10 11 2 10 11 2 10 11 11 2 10 11 11 2 10 11 11 2 11 11 11 11 11 11 11 11 11 11 1	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it? A. No, I don't know. 1773. Q. And do you think it was an independent contractor that you dealt with A. No. 1774. Qthat might have learned that information? A. They wouldn't have known that information, so, no. 1775. Q. And reading this e-mail, do you know whether Terrydo you know whether David Hooker was concerned that he might be fingered as the author of that? A. I think that David was concerned, because he was one of the people that knew certain information. 1776. Q. I see.	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 15 16 17 10 10 10 10 10 10 10 10 10 10 10 10 10	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give you is in some way connected to Stellar Point A. Okay. 1787. Qif you know, and you may not know. A. Okay. 1788. Q. But secondly, and equally importantly, whether or not you are involved in one of the companies. A. Okay. 1789. Q. Okay? A. Yes. 1790. Q. So, the first one is Jetsetter Dating Ltd. A. So, can I just say something before you ask 1791. Q. By all means. A. Okay. There is a few companies
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 10 11 12 10 11 12 10 11 12 11 11 12 11 11 11 11 11 11 11 11	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it? A. No, I don't know. 1773. Q. And do you think it was an independent contractor that you dealt with A. No. 1774. Qthat might have learned that information? A. They wouldn't have known that information, so, no. 1775. Q. And reading this e-mail, do you know whether Terrydo you know whether David Hooker was concerned that he might be fingered as the author of that? A. I think that David was concerned, because he was one of the people that knew certain information. 1776. Q. I see.	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give you is in some way connected to Stellar Point A. Okay. 1787. Qif you know, and you may not know. A. Okay. 1788. Q. But secondly, and equally importantly, whether or not you are involved in one of the companies. A. Okay. 1789. Q. Okay? A. Yes. 1790. Q. So, the first one is Jetsetter Dating Ltd. A. So, can I just say something before you ask 1791. Q. By all means. A. Okay. There is a few companies thatCanadian companies that my husband, when we
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 22 3 4 5 6 7 8 9 20 11 22 3 4 5 6 7 8 9 20 11 22 3 4 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 10 11 22 10 11 12 10 10 10 10 10 10 10 10 10 10 10 10 10	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it? A. No, I don't know. 1773. Q. And do you think it was an independent contractor that you dealt with A. No. 1774. Qthat might have learned that information? A. They wouldn't have known that information, so, no. 1775. Q. And reading this e-mail, do you know whether Terrydo you know whether David Hooker was concerned that he might be fingered as the author of that? A. I think that David was concerned, because he was one of the people that knew certain information. 1776. Q. I see. A. Yes, I thought it was David Hooker. Not that that matters	1 2 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 22 23 24	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give you is in some way connected to Stellar Point A. Okay. 1787. Qif you know, and you may not know. A. Okay. 1788. Q. But secondly, and equally importantly, whether or not you are involved in one of the companies. A. Okay. 1789. Q. Okay? A. Yes. 1790. Q. So, the first one is Jetsetter Dating Ltd. A. So, can I just say something before you ask 1791. Q. By all means. A. Okay. There is a few companies thatCanadian companies that my husband, when we were engaged at the time, he asked to put my name on
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 2 12 5 16 7 8 9 20 11 2 12 5 16 7 8 9 20 11 2 12 11 2 12 11 11	S.R. Schlacht - 331 1771. Q. So, you had an idea as to who did it? A. I had speculations of who did it. 1772. Q. Okay. But you don't know, I take it? A. No, I don't know. 1773. Q. And do you think it was an independent contractor that you dealt with A. No. 1774. Qthat might have learned that information? A. They wouldn't have known that information, so, no. 1775. Q. And reading this e-mail, do you know whether Terrydo you know whether David Hooker was concerned that he might be fingered as the author of that? A. I think that David was concerned, because he was one of the people that knew certain information. 1776. Q. I see. A. Yes, I thought it was David Hooker. Not that that matters	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	S.R. Schlacht - 333 A. Yes? 1785. Q. And if you can, please tell meI am going to have two questions. A. Sure. 1786. Q. One, whether the company name I give you is in some way connected to Stellar Point A. Okay. 1787. Qif you know, and you may not know. A. Okay. 1788. Q. But secondly, and equally importantly, whether or not you are involved in one of the companies. A. Okay. 1789. Q. Okay? A. Yes. 1790. Q. So, the first one is Jetsetter Dating Ltd. A. So, can I just say something before you ask 1791. Q. By all means. A. Okay. There is a few companies thatCanadian companies that my husband, when we

	Sheet 39 Page 150 S.R. Schlacht - 334		S.R. Schlacht - 336
1	said, "Can you put your name on?" And I said,		knowledge, that was connected in some way with
	"Voo" Those companies are now closed down but I		Banners Broker or Stellar Point?
2	"Yes". Those companies are now closed down, but I		
3	can't remember whether I was on Jetsetter Dating or	3	A. No.
4	not.	4	1806. Q. And I seeyou will see from the
5	1792. Q. Okay.	5	note on page 2 from the account, that the law firm
6	A. So, I am not trying to lie. I	6	was invoicing for a resolution electing yourself as
7	justI could have been	7	a director?
8	1793. Q. Right.	8	A. Yes. So, that would have been one
9	Aor I could not.	9	of the companies that my husband asked me to put my
10	1794. Q. So, I take it from your answer that	10	name on.
11	you have heard of Jetsetter Dating, then?	11	1807. Q. Okay. And RevStar Hosting Inc.?
12	A. I have, yes.	12	A. Yes, I believe my name was on that
13	1795. Q. And was thatthere is another one	13	one, as well.
14	of your husband's companies?	14	1808. Q. Right. But did that company have
15	A. I couldn'the was involved in it.	15	anything to do with Banners Broker or Stellar Point?
16	I don't know whether he owned it or what.	16	A. No, not to my knowledge.
17	1796. Q. Okay.	17	
18	A. I wouldn't be able to answer that.	18	
			May 23rd entry: 8889732 Canada Ltd.
19	1797. Q. But what was the connection between	19	A. Yes.
20	Jetsetter and Stellar Point Inc.?	20	1810. Q. Do you know what that company did
21	A. I am not sure. I only knowthere	21	or
22	is only certain ones that I know just because I have	22	A. No.
23	heard it, or because he asked me to put my name on	23	1811. Q. Okay.
24	it.	24	A. Certain companies that I did know, I
25	1798. Q. Okay. So, sitting here today, you	25	only knew as a name, not as a numbered company. So,
	Page 151	1	Page 153
	S.R. Schlacht - 335		S.R. Schlacht - 337
1	are not aware of any connection between Jetsetter	1	S.R. Schlacht - 337 I don't recognize that one.
1 2		1	S.R. Schlacht - 337
1 2 3	are not aware of any connection between Jetsetter Dating Ltd. and Stellar Point Inc.?	1 2 3	S.R. Schlacht - 337 I don't recognize that one. 1812. Q. And then RevStar Hosting Inc. Tell
	are not aware of any connection between Jetsetter Dating Ltd. and Stellar Point Inc.? A. No. Like, what do you mean,	1 2 3	S.R. Schlacht - 337 I don't recognize that one. 1812. Q. And then RevStar Hosting Inc. Tell me about RevStar Hosting?
	are not aware of any connection between Jetsetter Dating Ltd. and Stellar Point Inc.? A. No. Like, what do you mean, related? They are two separate companies. So, how	1	S.R. Schlacht - 337 I don't recognize that one. 1812. Q. And then RevStar Hosting Inc. Tell me about RevStar Hosting? A. RevStar Hosting? So, RevStar
3 4 5	are not aware of any connection between Jetsetter Dating Ltd. and Stellar Point Inc.? A. No. Like, what do you mean, related? They are two separate companies. So, how can they be related?	1 2 3 4 5	S.R. Schlacht - 337 I don't recognize that one. 1812. Q. And then RevStar Hosting Inc. Tell me about RevStar Hosting? A. RevStar Hosting? So, RevStar HostingI don't know much about it. That was just
3 4 5 6	are not aware of any connection between Jetsetter Dating Ltd. and Stellar Point Inc.? A. No. Like, what do you mean, related? They are two separate companies. So, how can they be related? 1799. Q. Well, I don't know, but one of the	1 2 3 4	S.R. Schlacht - 337 I don't recognize that one. 1812. Q. And then RevStar Hosting Inc. Tell me about RevStar Hosting? A. RevStar Hosting? So, RevStar HostingI don't know much about it. That was just one that my husbandhis Canadian company that my
3 4 5 6 7	are not aware of any connection between Jetsetter Dating Ltd. and Stellar Point Inc.? A. No. Like, what do you mean, related? They are two separate companies. So, how can they be related? 1799. Q. Well, I don't know, but one of the reasons why I am asking is because the law firm is	1 2 3 4 5 6 7	S.R. Schlacht - 337 I don't recognize that one. 1812. Q. And then RevStar Hosting Inc. Tell me about RevStar Hosting? A. RevStar Hosting? So, RevStar HostingI don't know much about it. That was just one that my husbandhis Canadian company that my husband_asked if I could put my name.
3 4 5 6 7 8	 are not aware of any connection between Jetsetter Dating Ltd. and Stellar Point Inc.? A. No. Like, what do you mean, related? They are two separate companies. So, how can they be related? 1799. Q. Well, I don't know, but one of the reasons why I am asking is because the law firm is billing Stellar Point for all of this work that was 	1 2 3 4 5 6 7 8	S.R. Schlacht - 337 I don't recognize that one. 1812. Q. And then RevStar Hosting Inc. Tell me about RevStar Hosting? A. RevStar Hosting? So, RevStar HostingI don't know much about it. That was just one that my husbandhis Canadian company that my husband asked if I could put my name. 1813. Q. Right.
3 4 5 6 7 8 9	 are not aware of any connection between Jetsetter Dating Ltd. and Stellar Point Inc.? A. No. Like, what do you mean, related? They are two separate companies. So, how can they be related? 1799. Q. Well, I don't know, but one of the reasons why I am asking is because the law firm is billing Stellar Point for all of this work that was done in respect of your husband's other companies. 	1 2 3 4 5 6 7 8 9	S.R. Schlacht - 337 I don't recognize that one. 1812. Q. And then RevStar Hosting Inc. Tell me about RevStar Hosting? A. RevStar Hosting? So, RevStar HostingI don't know much about it. That was just one that my husbandhis Canadian company that my husband asked if I could put my name. 1813. Q. Right. A. But I don't know. You would have to
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22	 are not aware of any connection between Jetsetter Dating Ltd. and Stellar Point Inc.? A. No. Like, what do you mean, related? They are two separate companies. So, how can they be related? 1799. Q. Well, I don't know, but one of the reasons why I am asking is because the law firm is billing Stellar Point for all of this work that was done in respect of your husband's other companies. A. I have no idea. I don't know how 1800. Q. Okay. AtheyI don't know. 1801. Q. Okay. A. Yes, sorry. 1802. Q. The Routerclick Computers Inc., are you familiar with that A. No, I am not. 1803. Qcompany? Okay. And, so, again, you are not aware of any relationship betweenany business dealings between Routerclick Computers Inc. and Stellar Point Inc.? A. No. 	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	S.R. Schlacht - 337 I don't recognize that one. 1812. Q. And then RevStar Hosting Inc. Tell me about RevStar Hosting? A. RevStar Hosting? So, RevStar HostingI don't know much about it. That was just one that my husbandhis Canadian company that my husband asked if I could put my name. 1813. Q. Right. A. But I don't know. You would have to ask him about the details of that. 1814. Q. DPR Consultants Ltd. Have you heard of that? It is on the first page of the account. A. It doesn't sound familiar, no. 1815. Q. Okay. And the Dixit Consortium Inc.? A. That 1816. Q. Have you heard of that? A. My husband would be able to answer more about that, but I don't know anything about the specifics. 1817. Q. Okay. And do you have any reason to
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			• 545
	Sheet 40 Page 154 S.R. Schlacht - 338	7	Page 156 S.R. Schlacht - 340
4			
1	that company.		1830. Q. And do you know whether or not there
2	1818. Q. Okay. So, then, just tab 60.	23	is a relation between RevStar Hosting Inc. and
3	A. 60, yes?		RevStar Global?
4	1819. MR. WARD: Just off the record for one	4 5 6 7	A. You would have to talk to Paul
56	second.	5	Redmayne or my husband about that.
6		6	1831. Q. Okay.
7	DISCUSSION OFF THE RECORD	7	A. Because I don't know, I am sorry.
8		8	1832. Q. Okay. Now, I take it from your
9	BY MR. WARD:	9	answers that yo are more familiar with RevStar
10	1820. Q. This is justfor your reference,	10	Hosting than you are RevStar Global?
11	it is the Industry Canada confirmation that you were	111	A. Well, RevStar Hosting, my name was
12	a director of RevStar Hosting Inc.?	12	on the company. So I am aware
		13	on the company. So, I am aware.
13	A. Yes, that is correct.		1833. Q. Ókay.
14	1821. Q. And then behind it, there is another	14	A. RevStar Global, I have nothing to do
15	tab. I don't know if you have seen this before, but	15	with.
16	it is ait mentions your name, which is why I am	16	1834. Q. But you are not aware of the
17	bringing it to your attention.	17	business of RevStar Hosting?
18	A. Yes. No, I know that my husband	18	A. No. But I do know that that company
19	asked me if I would be a director	19	is shut down.
20	1822. Q. Right.	20	1835. Q. Okay. And how do you know that?
21	Abecause his Internet presence was	21	A Because my husband told me
22	really bad. So, I said, "Yes", and then I was taken	22	1836. Q. And at tab 62, Alaco Group Ltd.?
23	off and the company was closed. That is	23	A. Yes, that is my company.
24	1823. Q. So, just go, if you would, please,	24	1837. Q. Okay. And does this company, now or
25	to the next tab, tab 61?	25	at any point in time, do business with or have any
L			at any point in time, to business with or have any
	Page 155	1	Page 157
	S.R. Schlacht - 339		S.R. Schlacht - 341
1	S.R. Schlacht - 339 A. 61, sorry. Yes?	1	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar
1	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that	1	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group?
1 2 3	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that relates to RevStar, and your name is in it on page	1 2 3	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group? A. No, this company is actually
1 2 3 4	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that relates to RevStar, and your name is in it on page 2?	1 2 3 4	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group? A. No, this company is actually completely dormant. There has been no business
1 2 3 4 5	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that relates to RevStar, and your name is in it on page 2? A. Yes.	1 2 3 4 5	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group? A. No, this company is actually completely dormant. There has been no business activity.
1 2 3 4 5	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that relates to RevStar, and your name is in it on page 2? A. Yes. 1825. Q. And I am just wondering, do you know	1 2 3 4	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group? A. No, this company is actually completely dormant. There has been no business activity. 1838. Q. Okay. And furthermore, it never had
1 2 3 4 5 6 7	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that relates to RevStar, and your name is in it on page 2? A. Yes.	1 2 3 4 5 6 7	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group? A. No, this company is actually completely dormant. There has been no business activity.
1 2 3 4 5 6 7 8	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that relates to RevStar, and your name is in it on page 2? A. Yes. 1825. Q. And I am just wondering, do you know whether or not RevStar had a legitimate business?	1 2 3 4 5	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group? A. No, this company is actually completely dormant. There has been no business activity. 1838. Q. Okay. And furthermore, it never had anything to do with Banners Broker or Stellar Point
1 2 3 4 5 6 7	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that relates to RevStar, and your name is in it on page 2? A. Yes. 1825. Q. And I am just wondering, do you know whether or not RevStar had a legitimate business? A. I can't answer anything about	1 2 3 4 5 6 7	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group? A. No, this company is actually completely dormant. There has been no business activity. 1838. Q. Okay. And furthermore, it never had anything to do with Banners Broker or Stellar Point or any of those companies?
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 17 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that relates to RevStar, and your name is in it on page 2? A. Yes. 1825. Q. And I am just wondering, do you know whether or not RevStar had a legitimate business? A. I can't answer anything about RevStar Global. My name was on RevStar Hosting, which is a different company. This is justI took a look at this because I did see my name, and I was like, "What is this?" This is just someone writing up a blog. 1826. Q. Okay. A. But, no, I had nothing to do with that. 1827. Q. Right. So, your name is on RevStar Hosting? A. Hosting, yes. Global, I believe you would need to talk to Paul Redmayne about Global. 1828. Q. Paul Redmayne isbut Global is your husband's company, though, right? A. No.	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group? A. No, this company is actually completely dormant. There has been no business activity. 1838. Q. Okay. And furthermore, it never had anything to do with Banners Broker or Stellar Point or any of those companies? A. No. This is my personal company. 1839. MR. WARD: Off the record. DISCUSSION OFF THE RECORD THE DEPONENT: So, if that is the one that matches thatokay. That is because the law firm helped me to open it up, but when they did their billing, they just stuck me under my husband instead of keeping it separate, which legally that is what they are supposed to do, I guess they just added it on to Raj's account. BY MR. WARD:
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$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\17\\8\\19\\20\\21\\22\\23\end{array}$	S.R. Schlacht - 339 A. 61, sorry. Yes? 1824. Q. Okay. So, this is something that relates to RevStar, and your name is in it on page 2? A. Yes. 1825. Q. And I am just wondering, do you know whether or not RevStar had a legitimate business? A. I can't answer anything about RevStar Global. My name was on RevStar Hosting, which is a different company. This is justI took a look at this because I did see my name, and I was like, "What is this?" This is just someone writing up a blog. 1826. Q. Okay. A. But, no, I had nothing to do with that. 1827. Q. Right. So, your name is on RevStar Hosting? A. Hosting, yes. Global, I believe you would need to talk to Paul Redmayne about Global. 1828. Q. Paul Redmayne isbut Global is your husband's company, though, right? A. No.	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	S.R. Schlacht - 341 sort of dealings with Banners Broker or Stellar Point, or any companies in that group? A. No, this company is actually completely dormant. There has been no business activity. 1838. Q. Okay. And furthermore, it never had anything to do with Banners Broker or Stellar Point or any of those companies? A. No. This is my personal company. 1839. MR. WARD: Off the record. DISCUSSION OFF THE RECORD THE DEPONENT: So, if that is the one that matches thatokay. That is because the law firm helped me to open it up, but when they did their billing, they just stuck me under my husband instead of keeping it separate, which legally that is what they are supposed to do, I guess they just added it on to Raj's account. BY MR. WARD:

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Sheet 41 Page 158 Page 160	510
	Schlacht - 344
1 MS. CRADDOCK: And to clarify for the 1 husband asking if I could go on as a	
2 record, you are referring to the 8889 2 know thator I am under the impress	sion that it has
3 THE DEPONENT: Let me just make sure it 3 been closed down, and I have been r	removed.
4 is the same one. I only know it as Alaco, 4 1847. Q. Okay. But do you know	
5 so let me justI need to personally make 5 now, or might you, about the time as	to the business
6 sure. 6 purpose or	
7 MS. CRADDOCK: Yes. 7 A. No.	
8 THE DEPONENT: Because the law firm 8 1848. Qdealings of Global M	erchant Pay
9 helped me open that, so I just have to 9 Inc.?	
10 confirm. What tab is that? [10 A. No.	
11 MS. DOSANJH: 62 is the federal 11 1849. Q. And do you know of an	y connection
12 corporate record search. 56 is the 12 between Global Merchant Pay Inc. ar 13 THE DEPONENT: 56. 13 group, one way or the other?	nd Banners Broker
13 THE DEPONENT: 56. 13 group, one way or the other? 14 MS. DOSANJH:ledger. It is page 2 14 A. To my knowledge, there is	c no
15 of the MSN invoice. And it is page 2 of 15 connection, but you would have toF	
16 the invoice. And it is page 2 of 16 best person to ask.	iaj would be the
17 THE DEPONENT: Page 2? [17 1850. Q. Tab 54 of the binder.	
18 MS. DOSANJH: Yes, May 23rd, 2014. 18 A. Yes?	
19 THE DEPONENT: Yes, so that is that one. 19 1851. Q. 64, I am sorry. 64. Th	e
20 I am not sure why they would be billing it 20 secondCasino Dreamscape. Are ye	ou familiar with
21 to Stellar Point, because 21 that entity? Have you heard of that b	efore?
22 A. I haven't.	
23 BY MR. WARD: 23 1852. Q. There is a tweet, or a result of the second se	etweet that
24 1841. Q. Okay. Well, also, with relation to 24 is second from the top of the page?	
25 that one]
Page 159 Page 161 S.R. Schlacht - 343 S.R. S	chlacht - 345
1 MS. DOSANJH: Sorry, and you say "that 1 1853. Q. Was that something that	
2 one", you mean 8889732 Canada Limited? 2 retweeted?	il you
3 THE DEPONENT: Yes, because that is my 3 A. No, I did not.	
4 company, Alaco, yes. 4 1854. Q. And then very quickly, ta	ab 65,
5 Paytronics. Have you heard of that no	ame before?
6 BY MR. WARD: 6 A. NO, I have not.	
7 1842. Q. Okay. So, just so that I could 7 1855. Q. And tab 67, Vegas360Li	ive? Do you
8 understand the connection or the lack of connection 8 know anything about that? 9 between Alaco and some of the other companies we 9 A. No. Sorry, I didn't even lo	ok ot
9 between Alaco and some of the other companies we 9 A. No. Sorry, I didn't even lo 10 have talked about today, did Alaco ever receive an 10 this. Yes, I don't know what this is.	UN di
11 investment, or startup capital or a loan or a grant? [11 1856. Q. Ian Driscolland this is	with
12 A. No, it is a completely dormant 12 reference to tab 68, the last tab	
13 company. 13 A. Yes.	
14 1843. Q. Did it ever receive an investment 114 1857. Q in the binder. You are	e seeking
15 from Stellar Point or Banners Broker or 15 instructions from David Hooker	
16 A. No. [16 A. Yes.	
17 1844. Qany of the other companies that 17 1858. Qcopied to Raj as to whether the second s	nether lan
171844.Qany of the other companies that171858.Qcopied to Raj as to whete the second	ions, as he was
171844.Qany of the other companies that171858.Qcopied to Raj as to whete the other companies that18we have talked about?18would be paid for December commiss19A.No.19terminated, this being in January of 20	ions, as he was
171844.Qany of the other companies that171858.Qcopied to Raj as to whete the provided to Raj as the provided to Raj a	ions, as he was
171844.Qany of the other companies that171858.Qcopied to Raj as to whete talked about?18we have talked about?18would be paid for December commiss19A.No.19terminated, this being in January of 20201845.Q.Okay. Global Merchant Pay Inc. is20A.Can I just read it for a second to a	ions, as he was
171844.Qany of the other companies that18we have talked about?171858.Qcopied to Raj as to whete talked about?19A.No.18would be paid for December commiss201845.Q.Okay.Global Merchant Pay Inc. is1820A.Can I just read it for a second21in the Industry Canada form at tab 63?22A.Yes.22A.Sorry, from David or	ions, as he was
171844.Qany of the other companies that171858.Qcopied to Raj as to whete the paid for December commiss18we have talked about?18would be paid for December commiss19A.No.19terminated, this being in January of 20201845.Q.Okay. Global Merchant Pay Inc. is20A.Can I just read it for a second to a second t	ions, as he was 113? ond? I

Shee	t 42 Page 162		Page 164
$ \begin{array}{cccccccccccccccccccccccccccccccccccc$	S.R. Schlacht - 346 be an IC, but if you ever were in breach of them, your contract would be terminated. So, I don't know the specific details. I wasn't involved in that, but I did know that Ian was terminated, and I was just clarifying whether he would be getting his December commissions or not. 1. Q. Right. And how was it you learned that Ian was terminated? A. I can't remember exactly. It could have been from Chris, it could have been from David. It could have been from Raj. 2. Q. Okay. And did you deal with Ian Driscoll prior to his termination? A. He was a reseller, and then an independent contractor. So, yes, I dealt with him on a regular basis.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 S.R. Schlacht - 348 directly with Chris. But then when he became an independent contractor, he dealt with me. 1870. Q. Okay. Towards the end he was dealingprior to his termination, he was dealing mainly with yourself? A. I mean, he could have talked directly with Chris, but 1871. Q. Okay. AI am not aware of any of those conversations. 1872. Q. Okay. And do you know when and how the decision to terminate him was made? A. When or how, I don't know the specifics. I know it was around this time, just by looking at the e-mail. 1873. Q. Right. And do you know who would have made that decision? A. Itdo I concretely know, orI don't. I can't give youI don't know. Like, I would thinkI don't want to say something in case it is not true, but I believe that it would have been Chris' final decision. 1874. Q. On Raj's recommendation? A. No, it would have been Chris'. Rajbecause I was in charge of the independent
Page 1 2 3 4 5 6 1869 7 8 1869 10 11 12 13 14 1865 16 17 1865 16 17 1865 20 1865 21 22 23 24	 S.R. Schlacht - 347 Broker meetings to promote his otherno, he was Banners Broker meetings and bringing Banners Broker affiliates to the meetings, and then trying to push another program, and that violates the independent contractor terms. Q. Okay. A. And, so, then he was terminated. Q. Okay. And how do you know that he was doing that? A. Well, I don't know exactly. I think another affiliate videotaped something and then sent it in. I don't know. I don't know the details, but that is Q. Okay. A. I do know that that is the reason why he was terminated. Q. Okay. A. Or one of the reasons. I don't know the 	$ \begin{array}{c} 1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\\24\\25\end{array} $	 Page 165 S.R. Schlacht - 349 contractors, I still reported to Raj, not Chris. So, Raj knew everything that was going on with the ICs. 1875. Q. Right. A. But I don't think it would have been Raj's final decision. I believe it would be Chris'. 1876. Q. So, in respect of Mr. Driscoll, am I right that you reported to Raj, that Driscoll was doing these things that put him out of compliance? A. Yes. 1877. Q. And then A. I think I would have reported to David, because he was in charge of compliance. 1878. Q. Right. A. And David would have either spoken to Raj or Chris. I am not sure. You would have to ask David about that, but I think, because it was a compliance issue, my proper chain of command would have been to go to David. 1879. Q. Right. And wheneverlike, when someone says would have, I need to ask, do you specifically recall reporting this to David or not? Because if you don't recall, then just tell me, and I will take, "I don't know" as an answer. A. I don't know.

	Sheet 43 Page 166	Page 168
1 2 3 4	Sheet 43 Page 188 S.R. Schlacht - 350 1880. MR. WARD: Let's go off the record. THE DEPONENT: Okay. A LUNCHEON RECESS	S.R. Schlacht - 352 company that did that volume of business to have a corporate credit card for the purposes of charging expenses? A. Yes, I never saw a credit card that
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A LONCHEON RECESS STEPHANIE R. SCHLACHT, resumed CONTINUED EXAMINATION BY MR. WARD: 1881. Q. Good afternoon. A. Afternoon. 1882. MR. WARD: Why don't weif we could mark for identification purposes this book of financial documents? Because I am going to be referring to most of the tabs. And, sothank you. And do you have a copy we can mark? Just because mine has got notes on it. So, let's markso, what exhibit are we at? So, we will mark as Exhibit B on Ms. Schlacht's examination the binder, three-ring binder of banking documents with 26 tabs. 	 5 had Stellar Point or Dixit Holdings on it as the formal name. 7 1888. Q. Okay. So, when you travelled with people, and because you have told us that, in most cases, when you were travelling with others, they would pay the bills, including your bills 11 A. Yes. 12 1889. Qand submit the expense report. 13 Do I take it they were using personal credit cards 15 A. I believe 16 1890. Qand being reimbursed through the company? 18 A. I believe so, and I know some of them had the Vector cards
20 21 22 23 24 25	EXHIBIT B: Binder of banking documents (26 tabs) tabs)	201891.Q.Okay.21Abut we talked about that last22time.231892.Q.But the Vector cards are pre-loaded24cards?Like, they are25A.That is correct.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 20 21 22 23 24 25 24 25 24 25 24 25 26 27 20 20 21 20 21 20 21 20 21 20 21 20 21 20 21 20 21 20 21 20 20 20 20 20 20 20 20 20 20 20 20 20	 Page 167 S.R. Schlacht - 351 1883. Q. And you will make sure that we have 26 tabs. So, there isjust before we begin with the binder, the two Dixit companies that the receiver is most interested in are the ones that are subject, obviously, to the receivership, and they are Stellar Point and then, secondly, Dixit Holdings Inc. A. Okay. 1884. Q. And do you know whether there were corporate credit cards issued to either of those companies at any point in time? A. CorporateI don't believe so. I don't think so. 1885. Q. Okay. Did you ever have access to a Visa or an American Express or a MasterCard that said Stellar Point on it or A. No. 1886. QDixit Holdings? So, you have neverdid you ever see anybody else use a corporate credit card for Stellar Point or Dixit Holdings Inc.? A. No. 1887. Q. And we believe that millions of dollars went through those companies, and I would 	Page 169 S.R. Schlacht - 353 1 1893. Qmore a means of payout. And I am 2 talking more about charge cards. 3 A. Notlike I said, most of the time, 4 I wasn't the one who signed for the cards, but I 5 don't recall ever seeing one that had 6 1894. Q. Okay. 7 Athose two company names. 8 1895. Q. And to the same point, when you are 9 travelling with Rajiv Dixit, did he use a personal 10 credit card to charge expenses related to Stellar 11 Point and Dixit Holdings, and then get reimbursed by 12 the companies later? Was that the way it works? 3 A. You would have to ask him. 14 1896. Q. Okay. 15 A. I don't know. I don'tyes, he 16 would probably give you the better answer for that. 17 1897. Q. I mean 18 A. Because I know he did use a credit 19 card, but I don't think that it wasI never saw a 20 credit card that had those company names on it. 21 1898. Q. Right. 22 A. Debit car

	Chart 44 Dame 170		Page 172 549
	Sheet 44 Page 170 S.R. Schlacht - 354		S.R. Schlacht - 356
1	A. Yes.	1	1914. Qelectronic access and signature
		2	card form
3	you have never seen a credit card that said "Stellar	3	A. Okay.
4	Point" or "Dixit Holdings" on it?	4	1915. Q. And that is your signature beside
5	A. I have never seen that, right.	5	the X in the box?
6	1901. Q. Okay, fair enough. Now, in terms of	6	A. That? That is Rajiv's signature.
7	debit cards, which you could use like that in an ATM	7	1916. Q. No, I am looking at
8	or for	8	A. You are on tab
9	A. Yes.	9	1917. Q. The first tab. It is a few pages
10	1902. Qdebit transactions, did Stellar	1 10	into the production. It looks like this.
11		11	A Okey This is my signature and I
	Point or Dixit Holdings ever have debit cards issued		A. Okay. This is my signature, and I
12	that you saw?	12	was added onRaj added me on just in case I needed
13	A. I believe there was debit cards,	13	to pay a bill or sign a cheque. I only ever signed
14	yes.	14	one cheque, and that was, I believe, for sewage and
15	1903. Q. Okay. And tell me about the debit	15	water. But it was just put I was just put on
16	cards. Did you see them? Did you have one? Who	16	there because this is when I still worked for him.
17	had them? What were the protocols surrounding their	17	We weren't together as a couple. This is when I
18	use?	18	just worked for him, and it was just in case I
19	A. Raj was the only one one that had	19	needed to sign something
20	them.	20	1918. Q. Okay.
21	1904. Q. Okay. And what did he use it for?	21	Aor pay a bill.
22	A. I don't know.	22	1919. Q. Okay. So, when you say "sewage and
23			
		23	water", did Dixit Holdingswere they receiving
24	A. Because I had been through his	24	sewage and water bills that you paid? Is that
25	wallet before.	25	A. No, well, I don't know. I believe
	Page 171		Page 173
	S.R. Schlacht - 355		S.R. Schlacht - 357
1	1906. Q. Okay.	1	that is the only one I paid, because my name was
2	A. And I am married to him.	2	never on Stellar Point, but I remember I did write a
3	1907. Q. And it sayssorry, did it say "Stellar Point" on it, or was it Dixit Holdings?	3	cheque for something to do withit was some sort
4	"Stellar Point" on it, or was it Dixit Holdings?	4	of amenity. I don't want to say sewage in case it
5	A. No, I don't remember. I don't even	5	wasn't sewage.
6	know if he had one forI don't think he ever had a	6	1920. Q. Okay. Now, it looks to me, from
	Dixit Holding debit card. I don't know. I don't	7	this form that we are looking at, that you also had
8	1908. Q. Okay, well, let me take you to	8	a CIBC convenience card?
9	A. Sorry.	9	A. Yes.
10		10	
11		11	
	The very first tab that we are going to look at		and there is a date, June 13th, 2013?
12	A. Yes.	12	A. I don't think I ever usedI
13	1910. Qis tab 1, which is the	13	couldn't actually say I never used it. I don't even
14	account-opening documentation	14	know if I had it in my position, or if Raj hung onto
15	A. Yes.	15	it.
16	1911. Q in respect to the CIBC account in	16	1922. Q. Okay. So, you never recall having
17	the name of a numbered company	17	one?
18	A. Yes.	18	A. I don't recall having one.
110		19	1923. Q. Okay. But you believe that Rajiv
19	1912. Qcalled 8163871 Canada Limited,		
19 20		20	had a debit card for
19	which was also known as Dixit Holdings Inc.	20	had a debit card for
19 20 21	which was also known as Dixit Holdings Inc. A. Okay.	20 21	had a debit card for A. I believe so, yes.
19 20 21 22	which was also known as Dixit Holdings Inc. A. Okay. 1913. Q. And if you look about halfway	20 21 22	had a debit card for A. I believe so, yes. 1924. Q. For Stellar Point?
19 20 21 22 23	which was also known as Dixit Holdings Inc. A. Okay. 1913. Q. And if you look about halfway through the production, you will see an authorized	20 21 22 23	had a debit card for A. I believe so, yes. 1924. Q. For Stellar Point? A. Are we talking about Dixit Holdings,
19 20 21 22	which was also known as Dixit Holdings Inc. A. Okay. 1913. Q. And if you look about halfway	20 21 22	had a debit card for A. I believe so, yes. 1924. Q. For Stellar Point?

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Index Groups and the value of the model model of the model model of the model of the model of the model				Demo 170)(
1 of them, but A. I don't know about Stellar Point 2 A. I don't know about Stellar Point 1926. Q. Okay. But for Dxit Holdings, you 4 believe that he did? 1937. Q. Yes. The next 13 documents that I 5 A. I think so. 1927. Q. All hight. And were you the offce 6 1927. Q. All hight. And were you the offce 1938. Q. And the mext that keament in 7 M. and the bom? 1938. Q. And the mext that statements from 10 an mot sure why I was put on as that. You would 1 11 har the bom? 1938. Q. Didy ou ceeive bank statements from 12 A. No. I did not. 1940. Q at Identifies yourself 14 respect of this account? 1940. Q at Statement in 15 A. No. I did not. 1940. Q at Statement in 16 1929. Q. Didy our ceeive bank statements from 1940. Q at Identifies yourself 16 1920. Q. Didy our ceeive bank statements from 1940. Q at Identifies yourself 1930. Q. So, moy of forward in the Exhibl B. Hist for not 1943. Q at Identifies yourself 1931. M. Tas 13 tabs behind it respect of this account 1943. Q on Novemeer 27h 2013. Can you		. Sheet 45 Page 174 S.R. Schlacht - 358		Page 176 S.R. Schlacht - 360	
2 A. I don't know about Stellar Point 2 1937. Q. Yes. The net 13 documents that I and going below your and IDxN Holdings. 3 1926. Q. Okay. But for Dixt Holdings inc. A. Yes, The net 13 documents that I and your and IDxN Holdings. 4 believe that he did? A. Yes, The net 13 documents that I and your and IDxN Holdings. 5 A. It hink so. Yes, The net 13 documents that I and your and IDxN Holdings. 6 1927. Q. All right. And were you the office manager, so I and source with were sput on the same tab. 10 9 A. I was never the office manager, so I and stare with was put on as that. You would have to ask the banker. 1938. Q. And then within the same tab. 10 annot surve with your abank statements from CIBC in respect of this account? 1 11 1928. Q. Did you everg on line to do online transactions in respect of this account? 1 12 A. No. I did not. 1 1930. Q. So, moving forward in the Exhibit B. 11 1930. Q. So, moving forward in the Exhibit B. 1 1944. Q. So, why were you paying money into 24 13 1931. Q311. It has 13 tabs behind it related to Dxit Holdings Inc., and the saked to Dxit Holdings Inc., and the saked to Dxit Holdings Inc., and the saked to the same tab. 1 1932. Q. Okay? So, theses are 13 finanxial documents that relates to Dxit Holdings Inc., a			1		
1926. O. Cray. But for Divit Holdings, you am going to show you are all Divit Holdings. 4 A Impire that he divits 5 A. Impire that he divits 6 1927. Q. All ingit. And were you the office 7 manager of Divit Holdings. 8 Here to manager to Divit Holdings. 9 A. Iwas never the office manager, so I 10 am not sure why I was put on as that. You would 11 have to ask the banker. 12 1262. Divit you receive bank statements from CIBC in 13 A. Mol Idd not. 14 respect of this account? 15 A. No. Idd not. 16 manager of Divit Holdings in. 17 A. Yes. Image and Divit Holdings in. 18 Pagen 173. 20 Divit eever go online to do online 19 1930. O. So, moying forward in the Exhibit B. 19 1931. O. So, moying forward in the Exhibit B. 20 there is a while tab with an account number on it, ending services you 21 and may husband ineeded the money, and I had the money. an			2		
4 beliew that he did? 5 A. I thrik so. 6 1927. Q. All right. And ware you the office manager of Dixt Holdings inc. as is indicated on at the form? 9 A. I was never the office manager, so I and the born? 9 A. I was never the office manager, so I and the born? 10 am of sure will was put on as that. You would thave to ask the banker. 12 1928. Q. Did you receive bank statements from CIBC. 11 1929. Did you receive bank statements from CIBC. 15 A. No, I did not. 16 1929. Did you ever go online to do online transactions in respect of this account? 17 Transactions in respect of this account? 18 A. No, I did not. 19 90. So, moving forward in the Exhibit B, there is a white tab with an account number on it, ending with 7/37			1 2		
5 A. I think so. 5 938. Q. And then within the same tab. 6 1927. Q. All right. And were you the office flipping forward to the next document 7 manager of Dixit Holdings Inc. as is indicated on the form? 939. Q. Okay. This is a bank statement in respect to the same tab. 9 A. Invary never the office manager, so I 100 am mot sure why I was put on as that. You would the view to back the anker. 11 1928. Q. Did you receive bank statements from CIBC in the respect of this account? 1940. Qas the depositor 12 1928. Q. Did you vever on ponline to do online to do noline to do online to do mine the resize to the same tab. 1941. Qas the depositor 19 1929. Qof 324,000 amount to that Dixit Holdings the 1943. Yes. 19 M. Yes. M. Yes. 1943. Qof 324,000 amount to that Dixit Holdings account. 19 Yes. A. Yes. 1943. Qof 324,000 amount to that Dixit Holdings the 19 Yes. A. Yes. Yes. Yes. 1931. Q				Δ Ves I have no idea	
6 figping forward to the next document 7 manager of Dixit Holdings Inc. as is indicated on 8 the form? 9 A. Iwas never the office manager, so I 10 am not sure why I was put on as that. You would 11 have to ask the bankst. 12 1928. Q. Did you receive bank statements from CIBC in 14 respect of this account? 1941. Q that identifies yourself 15 A. No. I did not. 1929. Q. Did you every on online to do online 16 there is a white tab in account? 14 A. Yes. 1920. D. Did you every on online to do online 14 Holdings account 1921. O on Xorember 27th, 2013. Can you 18 4. Yes. 1930. Q. So. moving forward in the Exhibl B. Holdings account 14 1931. Q		A I think co			
7 Minm. 8 the form? 9 A. Iwas never the office manager, so I 10 an not surve why lwas puto as that. You would 11 have to ask the famewise. 12 1928. O. Did you receive bank statements from 13 CIBC, monthy or annual bank statements from CIBC, monthy or annual bank statements from 14 respect of this account? A. 15 A. No, I did not. 16 1929. O. July ou every go online to do online 17 transactions in respect of this account? Holdings account. 18 A. No, I did not. 1930. O. Semost financial 20 the that with an account number on it, 1943. O. 11 1943. O. A. 21 each was a loan agreement ta home. It is from my personal account. 22 A. Yes. Yes. 23 1931. O. SR. Schlacht -359 11 1932. O. Well we were about to get married. 24 Dixit Holdings Inc					
8 the form? 8 1939. Q. Okay, This is bank statement in respect of the same CIBC account 10 am not sure wity i was put on as that. You would have to ask the banker. 10 A. Yes. 12 1928. Q. Didy ou receive bank statements from CIBC in respect of this account? 11 1940. Qthat identifies yourself 14 respect of this account? 4. Yes. 13 1941. Qas the depositor 15 A. No, I did not. 1942. Qdoi & \$24,000 amount to that Divit 16 1930. Q. So, moving forward in the Exhibit B, tree is a white taw that account number on it, ending with 7137 1943. Qon November 27m, 2013. Can you 1931. Qshat is a loan hart l gave my treated to Divit Holdings Inc 20 A. Yes. 25 A. Okay. S.R. Schlacht - 359 S.R. Schlacht - 359 1 1932. Q. Okay? So, these are 13 financial documents that relate to Divit Holdings Inc and the question is, can you tell me what consulting services you was in January. February, March, April, May, June, JulyOctober 18th? Is that where that would be 12013? Page 177 S.R. Schlacht - 359 1 1933. Q. Yes, it was. 14 and my husband needed the money, and I had the docub brow. JulyOctober 18th? Is that where that would be 12013? S.R. Schlacht - 359 1 1933. Q. Yes, it was.					
9 A Iwas never the office manager, so I 10 am not sure why I was put on as that. You would 11 have to ask the banker. 12 1928. O. Did you receive bank statements from CIBC in 13 CIBC, monthly or annual bank statements from CIBC in 14 respect of this account? 15 A. No, I did not. 16 1929. O. Did you every online to do online 17 A. No, I did not. 18 A. No, I did not. 19 1930. O. So, moving forward in the Exhibit B, 10 mere is a while tab with an account number on it, 11 nervices 1931. O				A. WITHIN.	
10 an not sure why lwas put on as that. You would 11 have to ask the banker. 12 1928. Q. Did you receive bank statements from CIBC in 14 respect of this account? 15 A. No. I did not. 16 1929. D. Did you receive go online to do online 17 transactions in respect of this account? 18 A. No. I did not. 1930. Q. So, moving forward in the Exhibit B, 1931. Q. So, moving forward in the Exhibit B, 1931. Q. So, moving forward in the Exhibit B, 1931. Q. So, moving forward in the Exhibit B, 1933. Q. Okay? So, these are 13 financial 20 A. Yes. 1932. Q. Okay? So, these are 13 financial 2 documents that relate to Dixit Holdings Inc. 2 A. Weil, we were about to get married. 7 A. Inever provided any consulting 8 services, So, I am not sure why that was put I antex. 13 934. Q. Oyou recall receiving and cashing 14 relate to Dixit Holdings? Feret 2.77 7 A. Inever provided any consulting <t< td=""><td></td><td></td><td></td><td>1939. Q. Okay. This is a bank statement in</td><td></td></t<>				1939. Q. Okay. This is a bank statement in	
11 have to ask the banker. 12 12 A. Did you receive bank statements from CIBC in 13 CIBC, monthy or annual bank statements from CIBC in 14 respect of this account? 15 A. No, I dd not. 16 1929. Q. Did you ever go online to do online 16 1929. Q. Did you ever go online to do online 17 transactions in respect of this account? 18 A. No, I dd not. 19 1930. Q. So, moving forward in the Exhibit B, 20 there is a white tab with an account number on it, 11 1941. Qof a S24,000 amount to that Dixit 19 1930. Q. So, moving forward in the Exhibit B, 20 there is a white tab with an account number on it, 21 nubstand and we have a loan agreement at home. It 23 1931. Q311. It has 13 tabs behind it 24 A Cys. 25 A. Okay. 26 A. Wesling in cand is there 27 A. Okay. 28 S.R. Schlacht - 359 1932. Q. Okay? So, these are 13 financial documents that relate to Dixit Holdings incand the morey, and 1 had the <t< td=""><td></td><td></td><td></td><td></td><td></td></t<>					
12 1928. Q. Did you receive bank statements from CIBC, monthly or annual bank statements from CIBC in 14 12 A. Yes. 15 A. No. I did not. 13 1941. Qas the depositor 16 1929. Q. Did you everge online to do online transactions in respect of this account? 15 1942. Qas the depositor 18 A. No. I did not. 19 1930. Q. So. moving forward in the Exhibit B. 20 11 1943. Qon November 27th, 2013. Can you 19 1930. Q. So. moving forward in the Exhibit B. 20 1931. Qas the depositor A. Yes. 19 1930. Q. Yes. 21 1943. Qon November 27th, 2013. Can you 19 1930. Q. Yes. 21 1943. Qon November 27th, 2013. Can you 21 ending with 7137 A. Yes. 1943. Qon November 27th, 2013. Can you 22 A. Yes. No. Lid not. 1943. Q. So. why were you paying money into 24 related to Dixit Holdings Inc., and 1944. Q. So. why were about to get married. 7 A. Inever provided any consulting S.R. Schlacht - 359 7 A. Inever provided any consulting 1946. Q list want to understand it. 8 services. So, I am not sure why that wasoutherea 1946.					
13 CIBC, monthly or annual bank statements from CIBC in 14 13 1941. Qas the depositor 14 A. No, 1 did not. 14 A. Yes. 15 A. No, 1 did not. 16 1929. Q. Did you ever go online to do online transactions in respect of this account? 15 1942. Qof a \$24,000 amount to that Dixit 18 A. No, 1 did not. A. Yes, it so crect. 14 Holdings account 19 1930. Q. So, moving forward in the Exhibit B. 14 Holdings inc. 1943. Qon November 27th, 2013. Can you 19 1930. Q. So, moving forward in the Exhibit B. 1943. Qon November 27th, 2013. Can you 19 1931. Q					
14 respect of this account? 14 A. Yes, 15 A. No. I did not. 15 1942. Q. Liby ou ever go online to do online 17 transactions in respect of this account? 18 A. No. I did not. 19 900. Q. moving forward in the Exhibit B, 1943. Qon November 27th, 2013. Can you 19 there is a white tab with an account number on it, 1943. Qon November 27th, 2013. Can you 11 ending with 7137 S.m. Schlacht - 359 A. Yes. 11 11 related to Dixit Holdings Inc. 20 A. That is a hoan that I gave my 21 11 related to Dixit Holdings Inc. 23 1944. Q. So, why were you paying money into 12 A. Okay. S.R. Schlacht - 359 S.R. Schlacht - 359 S.R. Schlacht - 369 11 1932. Q. Okay? So, these are 13 financial 1 and my husband needed the money, and I had the 2 documents that relate to Dixit Holdings Inc. and my husband needed the money, and I had the money. So I lent it to him. 3 1945. Q. Us are lending it toand it shere a loan agreement that describes loan term? 4					
15 A. No. I did not. 16 1929. Q. Did you ever go online to do online transactions in respect of this account? 18 A. No. I did not. 19 G. So, moying forward in the Exhibit B, there is a while tab with an account number on it, ending with 7137 A. Yes, that is a loan that I gave my 21 ending with 7137 A. Yes. 23 1930. Q311. It has 13 tabs behind it related to Dixit Holdings Inc. 1943. Qon November 27th, 2013. Can you 23 Page 175 S.R. Schlacht - 359 1942. Q. Okay? So, these are 13 financial documents that relate to Dixit Holdings Inc., and documents that relate to Dixit Holdings Inc., and the first one is a cheque payable to yourself for sonsuling services? Can you tell me, the question sis, can you tell me what consulting services you was in January. February, March, April, May, June, 19 was in January. February, March, April, May, June, 19 was in January. February, March, April, May, June, 19 was in January. February, March, April, May, June, 19 was in January. February, March, April, May, June, 19 was no larger. Jike, Just Ymat Was band fidch them ane was, and the asked 19 this cheque? 19 was in January. February. March, April, May, June, 19 was in January. February, March, April, May, June, 19 was no larger. Jike, Just Ymat, Kaprany, March, April, May, June, 19 was no larger. Jike, Just Ymat, Just Was to understand it. 19 was in January. February, March, April, May, June, 19 was in January. February, March, April, May, June, 2013? <td></td> <td></td> <td></td> <td>1941. Qas the depositor</td> <td></td>				1941. Qas the depositor	
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24 1936. Q. It is Dixit Holdings Inc., as well, 24 stop you there. Was the loan to Dixit Holdings or	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	S.R. Schlacht - 359 1932. Q. Okay? So, these are 13 financial documents that relate to Dixit Holdings Inc., and the first one is a cheque payable to yourself for consulting services? Can you tell me, the question is, can you tell me what consulting services you were providing to Dixit Holdings? A. I never provided any consulting services, but I believe that this wasbecause it was in January, February, March, April, May, June, JulyOctober 18th? Is that where that would be 2013? 1933. Q. Yes, it was. A. Yes, I never provided consulting services. So, I am not sure why that was put there. 1934. Q. Do you recall receiving and cashing this cheque? A. I don't, but it is a possibility that I could have, but I am notthis is aroundI was no longerlike, I just finished up my employment with Stellar Point. So, I am thinking it was outstanding. I don't know. I have no idea.	1 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 21 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 20 11 12 3 4 5 6 7 8 9 20 11 12 14 5 16 7 8 9 20 11 12 14 5 16 7 8 9 20 11 12 11 12 11 14 5 16 17 10 10 10 10 10 10 10 10 10 10 10 10 10	S.R. Schlacht - 361 and my husband needed the money, and I had the money, so I lent it to him. 1945. Q. You are lending it toand is there a loan agreement that describes loan term? I mean, you say "loan" A. Yes. 1946. QI just want to understand it. A. My husband needed the money, and I had it sitting in my personal account, and he asked if he could borrow it from me. So, I said yes, because you knowlike I told you before, the only reason why, at this time, I am on there is because my husband didn't have a will in place, and I made him put me on the company. Back in June 2013, or whenever this one was, that was when I was still working for Stellar Point, and he may have needed me to do some things for him. This is when we were engaged, and I made him put me on Dixit Holdings because I wanted to make sure that if something happened to him and he didn't have a will in place, that at least I was on the company. Remember we	
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125 Erin reminded me. 1125 vour husband? Because we are talking about a Dixit	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 S.R. Schlacht - 359 1932. Q. Okay? So, these are 13 financial documents that relate to Dixit Holdings Inc., and the first one is a cheque payable to yourself for consulting services? Can you tell me, the question is, can you tell me what consulting services you were providing to Dixit Holdings? A. I never provided any consulting services, but I believe that this wasbecause it was in January, February, March, April, May, June, JulyOctober 18th? Is that where that would be 2013? 1933. Q. Yes, it was. A. Yes, I never provided consulting services. So, I am not sure why that was put there. 1934. Q. Do you recall receiving and cashing this cheque? A. I don't, but it is a possibility that I could have, but I am notthis is aroundI was no longerlike, I just finished up my employment with Stellar Point. So, I am thinking it was outstanding. I don't know. I have no idea. 	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\8\\9\\21\\22\\23\end{array}$	 S.R. Schlacht - 361 and my husband needed the money, and I had the money, so I lent it to him. 1945. Q. You are lending it toand is there a loan agreement that describes loan term? I mean, you say "loan" A. Yes. 1946. QI just want to understand it. A. My husband needed the money, and I had it sitting in my personal account, and he asked if he could borrow it from me. So, I said yes, because you knowlike I told you before, the only reason why, at this time, I am on there is because my husband didn't have a will in place, and I made him put me on the company. Back in June 2013, or whenever this one was, that was when I was still working for Stellar Point, and he may have needed me to do some things for him. This is when we were engaged, and I made him put me on Dixit Holdings because I wanted to make sure that if something happened to him and he didn't have a will in place, that at least I was on the company. Remember we talked about that last time? 1947. Q. Yes. I justokay. So, let me 	
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	Sheet 46 Page 178 S.R. Schlacht - 362	┐ ┌── [⋷]	S.R. Schlacht - 364
1 2 3	Holdings account here. A. My husband needed it, and he asked me where I should deposit, and he said, "Into the	1 2 3	was doing business-wise. 1959. MR. WARD: Okay. Off the record for one second.
45	Dixit Holding account". 1948. Q. Okay. So, you went to your personal	4	DISCUSSION OFF THE RECORD
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 account because he asked you to, and you paid \$24,000 into the Dixit Holdings account? A. I lent him \$24,000, yes. 1949. Q. Okay. So, when you say "loan", you don't meanmaybe you do, but there wasn't, likeyou didn't see lawyers and draft a loan agreement with interest or anything like that? A. No, we actually did have the lawyerwe weren't legally married because I am, like, anal. 1950. Q. Okay. A. We weren't legally married. So, like, if we were legally married at that time, I would have just given it to him 1951. Q. Right. 	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 BY MR. WARD: 1960. Q. The receiver would like to see a copy of your loan agreement. A. I would have to find it. 1961. Q. Okay. Could you A. Butyes 1962. Q. And the reason is, just A. I think I still have it. 1963. Q. Okay. A. One was written. So if I can find it, I will let you 1964. Q. Please, if you would, because it has a Dixit Holdings component, obviously. And then
20 21 22 23	1951. Q. Right. Abut we had a draft put in place just in case, you know, Heaven forbid, we didn't get married	20 21 22 23	Aknow MS. DOSANJH: I think it arises out of the question. So, I mean, if there is an explanation, the explanation is it is a
24 25	1952. Q. Right. Athat I would have that money	24	loan, well, then, that is why it comes out that if there is a loan, and the answer is
	Page 179	- I L	age 181
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1	S.R. Schlacht - 363 returned to me.	1	S.R. Schlacht - 365
1 2 3	returned to me. 1953. Q. Okay. And when is that money	1 2 3	S.R. Schlacht - 365 there is a loan agreement, my understanding is then you would have produced the loan
2 3 4 5 6	returned to me. 1953. Q. Okay. And when is that money ultimately repaid? A. It is supposed to be repaid eventually. But, no, it hasn't been repaid. 1954. Q. Were there any other loans that you	3 4 5 6	S.R. Schlacht - 365 there is a loan agreement, my understanding is then you would have produced the loan agreement THE DEPONENT: Yes, that is fine. 1965. MR. WARD: Right, okay. And MS. DOSANJH: Is what your answer
2 3 4 5 6 7 8 9	returned to me. 1953. Q. Okay. And when is that money ultimately repaid? A. It is supposed to be repaid eventually. But, no, it hasn't been repaid. 1954. Q. Were there any other loans that you made to Dixit Holdings Inc., apart from this one? A. No. 1955. Q. And what was the purpose of the	3 4 5 6 7 8 9	S.R. Schlacht - 365 there is a loan agreement, my understanding is then you would have produced the loan agreement THE DEPONENT: Yes, that is fine. 1965. MR. WARD: Right, okay. And MS. DOSANJH: Is what your answer 1966. MR. WARD: So, thank you for that. And then, to the extent that you may not have a copy
2 3 4 5 6 7 8 9 10 11 12	returned to me. 1953. Q. Okay. And when is that money ultimately repaid? A. It is supposed to be repaid eventually. But, no, it hasn't been repaid. 1954. Q. Were there any other loans that you made to Dixit Holdings Inc., apart from this one? A. No. 1955. Q. And what was the purpose of the loan? A. My husband said that he needed the money. So	3 4 5 6 7 8 9 10 11 12	S.R. Schlacht - 365 there is a loan agreement, my understanding is then you would have produced the loan agreement THE DEPONENT: Yes, that is fine. 1965. MR. WARD: Right, okay. And MS. DOSANJH: Is what your answer 1966. MR. WARD: So, thank you for that. And then, to the extent that you may not have a
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 returned to me. 1953. Q. Okay. And when is that money ultimately repaid? A. It is supposed to be repaid eventually. But, no, it hasn't been repaid. 1954. Q. Were there any other loans that you made to Dixit Holdings Inc., apart from this one? A. No. 1955. Q. And what was the purpose of the loan? A. My husband said that he needed the money. So 1956. Q. But he must have told you more than that. What was it for? A. I honestly don't know what it is for. My husband takes care of the finances. I take care of the family, and when you are married you do things for your partner, right? 1957. Q. But you weren't married at this time, though. A. We were getting married in a few 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	S.R. Schlacht - 365 there is a loan agreement, my understanding is then you would have produced the loan agreement THE DEPONENT: Yes, that is fine. 1965. MR. WARD: Right, okay. And MS. DOSANJH: Is what your answer 1966. MR. WARD: So, thank you for that. And then, to the extent that you may not have a copy THE DEPONENT: I am pretty sure I do. 1967. MR. WARD: Okay. THE DEPONENT: Yes. BY MR. WARD: 1968. Q. And was it Maconald Sager Manis that would have prepared that? A. I can't remember if we got a law firm to do it, or if I just wrote it up and had him sign it. 1969. Q. Okay. So, the very next page in the production
2 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 2 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	 returned to me. 1953. Q. Okay. And when is that money ultimately repaid? A. It is supposed to be repaid eventually. But, no, it hasn't been repaid. 1954. Q. Were there any other loans that you made to Dixit Holdings Inc., apart from this one? A. No. 1955. Q. And what was the purpose of the loan? A. My husband said that he needed the money. So 1956. Q. But he must have told you more than that. What was it for? A. I honestly don't know what it is for. My husband takes care of the finances. I take care of the family, and when you are married you do things for your partner, right? 1957. Q. But you weren't married at this time, though. 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	S.R. Schlacht - 365 there is a loan agreement, my understanding is then you would have produced the loan agreement THE DEPONENT: Yes, that is fine. 1965. MR. WARD: Right, okay. And MS. DOSANJH: Is what your answer 1966. MR. WARD: So, thank you for that. And then, to the extent that you may not have a copy THE DEPONENT: I am pretty sure I do. 1967. MR. WARD: Okay. THE DEPONENT: Yes. BY MR. WARD: 1968. Q. And was it Maconald Sager Manis that would have prepared that? A. I can't remember if we got a law firm to do it, or if I just wrote it up and had him sign it. 1969. Q. Okay. So, the very next page in the

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1	MS.	S.R. Schlacht - 366 S.R. Schlacht - 366 DOSANJH:the loan agreement? R. WARD: There hasn't been a lot of	1 2	Page 184 1983.	S.R. Schlacht - 368 Q. Okay. MS. DOSANJH: Is this the \$20,000
3	unde MS.	rtakings, so DOSANJH: Right. So, I am just g toso, that was a loan agreement?	345	1984.	MR. WARD: This is for a different amount, and it is a different date. It just happens to be behind the same tab
6 7 8	1972. M betw	Ř. WARD: The loan agreement is eenthe loan agreement relating to 24,000 deposit into the Dixit Holdings	6 7 8		as THE DEPONENT: I don't know what this is.
9 10 11	Inc. I 2013	bank account at CIBC on November 27th,	9 10 11		MS. DOSANJH: So, he is asking about the instrument. The instrument reflects that it is payable to you, and it is \$20,000.
12 13	1973. M	R. WARD: 1. DOSANJH: Tab 1, okay.	12		The question, David, from my understanding, is, "What is that for?"
14	THE	R. WARD: Thank you. DEPONENT: If I	14	1985.	MR. WARD: And do you have any knowledge of
16 17 18 19	an ur 1975. MI	DOSANJH: Do you want me to give you idertaking to provide that, or R. WARD: Please, yes. DOSANJH: Okay, to the best of our	16 17 18 19	1986.	THE DEPONENT: I can't remember. MR. WARD:this document, in terms of how, when, why it was prepared? THE DEPONENT: Does it know if it was
20 21 22	ability	/ to R. WARD: Whatever you are comfortable	20 21 22		cashed or not? Because maybe he was going to pay me back and then didn't.
23 24 25	MS. Ì THE	DOSANJH: Okay. U/T DEPONENT: Like, I am 99.9 percent because I am really organized, that I	22 23 24 25	BY MR. 1987. knov	WARD: Q. Well, I just need to know what you v about it, and if you don't know anything about
	Page 183	S.R. Schlacht - 367		Page 185	S.R. Schlacht - 369
1 2		it filed away. If for some reason I find it, then I can't find it. Okay.	1 2		nd let me ask you this: Did you receive 000 from
3	BY MR. WARD		3	1988.	A. No, I didn't. QDixit Holdings Inc
5 6 7	1977. Q. in the same A.	So, have a look at the next document tab. It is at the back of tab 1. Okay, yes?	5 6 7	1989.	A. No. Qby way of a bank draft? A. No.
8	1978. Q. payable to	This is a bank draft for \$20,000 yourself?	8	1990.	Q. Around this time? A. No.
10 11 12	1979. Q.	Payable to me? Yes. You should see your name at	10 11 12	1991. 1992.	Q. Or at any other time? A. Not to my knowledge. Q. And then Dixit Holdings Inc. has
13 14		e date is December 17, 2012. In 2012? Sorry, 2013, it is an image of a	13	incur	Q. And then Dixit Holdings Inc. has red a number of expenses. And I am sorry, hanie, I am moving forward to tab 2, now.
15 16 17	cheque. So	b, it can be difficult to make out, but Is this the one that I gave Dixit	15 16 17	1993.	A. Yes? Q. Just because I accept your answer you don't know about that bank draft.
18 19	1981. Q. is, but this i	You will need to tell me what this s a Dixit Holdings Inc. bank draft	18	1994.	A. Okay. Q. Now, there are some CIBC bank
20 21 22		rourself personally. I don't think so, because I lent my 0.000.	20 21 22	state 1995.	A. Yes. Qbeen provided.
23 24	1982. Q. that.	Yes, and it may not be related to	23	1996.	A. Okay. Q. And some of these statements relate
25	A.	Yes.	25		e period of time in which you were a signing

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	Sheet 48 Page 186		Page 188 553
	S.R. Schlacht - 370		S.R. Schlacht - 372
1	officer, and some predate it?	1	A. I don't know who that is.
23	A. Correct.	2	2010. Q. Okay. And then the next one is the
	1997. Q. And there are some expenses that I	3	next page over.
4	am wondering if you know whether or not they were	4	A. Yes.
5	corporate expenses? Dixit Holdings Inc. being the	5	2011. Q. Is Zachary?
67	corporation?	6	A. No.
8	A. Okay. 1998. Q. So, the first one, behind tab 2, is		2012. Q. And then the next page over, it is Trevor Brown G.?
9	that Holt Renfrew expense item on September the 4th,	9	A. I don't know.
10	2012?	10	2013. Q. And then the next page over, it is
11	A. Yes?	111	Mekhi?
12	1999. Q. Do you have any knowledge,	12	MS. DOSANJH: Does it say "RESP" before
13	information or belief as to what that relates to?	13	that?
14	A. I don't have any knowledge, no.	14	2014. MR. WARD: Yes. In every case it says
15 16	2000. Q. And then moving forward to the very next document within the same tab, you will see	15	"RESP". THE DEPONENT: Voc. no. I don't
17	A. That was before I was even on	17	THE DEPONENT: Yes, no, I don't.
18	2001. Q. And in fairness, that is why I	18	BY MR. WARD:
19	pointed it out to you, because we will see some that	1 19	2015. Q. And then the following page, there
20	took place while you were on, as well.	20	is an RESP. There is a note, "RESP Kingston"?
21	A. Yes, I don't have any knowledge of	21	A. No.
22	this.	22	2016. Q. And then moving forward in the book
23 24	2002. Q. Okay. But, Stephanie, to your last	23	to behind tab 4, the information provided to the
24	point, when you were on, in the sense of being a signing officer	24	receiver by the CIBC documents payments for a number of cars.
L		20	or cars.
]	Page 187		Page 189
	Page 187 S.R. Schlacht - 371		Page 189 S.R. Schlacht - 373
1		1	S.R. Schlacht - 373 A. Okay.
1	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any	1 2	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are
1 2 3	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that	1 2 3	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz
1 2 3 4	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank	1 2 3 4	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be
1 2 3 4 5	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't.	1 2 3 4 5	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it
1 2 3 4 5 6	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either.	1 2 3 4	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at
1 2 3 4 5 6 7 8	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every	1 2 3 4 5	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point?
1 2 3 4 5 6 7 8 9	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going,	1 2 3 4 5 6 7 8 9	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of
1 2 3 4 5 6 7 8 9 10	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3	1 2 3 4 5 6 7 8 9 10	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account?
1 2 3 4 5 6 7 8 9 10 11	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes?	1 2 3 4 5 6 7 8 9 10 11	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think.
1 2 3 4 5 6 7 8 9 10 11 12	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a	1 2 3 4 5 6 7 8 9 10 11 12	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only
1 2 3 4 5 6 7 8 9 10 11 12 13	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company,	1 2 3 4 5 6 7 8 9 10 11 12 13	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't
1 3 4 5 6 7 8 9 10 11 12 13 14	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company, and there is a number of them. This is the first in	1 2 3 4 5 6 7 8 9 10 11 12 13 14	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't know anything to do with any finances to do with
1 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company, and there is a number of them. This is the first in a series	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't know anything to do with any finances to do with this company.
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1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 10 11 12 10 11 12 10 11 10 11 10 11 10 11 10 10 10 10 10	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company, and there is a number of them. This is the first in a series A. Yes, that is right. 2007. Qand they are A. I don't know.	1 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 12 14 15 16 17 10 10 11 11 12 10 10 10 10 10 10 10 10 10 10 10 10 10	 S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't know anything to do with any finances to do with this company. 2019. Q. Okay. A. I have never seen bank statements. I have never been online. I don't know anything
1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 16 7 8 9 0 11 2 3 4 5 16 7 8 9 0 11 12 3 4 5 6 7 8 9 10 11 12 11 11	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company, and there is a number of them. This is the first in a series A. Yes, that is right. 2007. Qand they are A. I don't know. 2008. Qnoted as being RESP contributions	1 2 3 4 5 6 7 8 9 10 11 12 13 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 10 11 12 3 4 5 10 11 12 13 14 5 10 10 10 10 10 10 10 10 10 10 10 10 10	 S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't know anything to do with any finances to do with this company. 2019. Q. Okay. A. I have never seen bank statements. I have never been online. I don't know anything about the financials.
1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 12 11 12 10 11 12 10 10 11 12 10 11 12 10 10 10 10 10 10 10 10 10 10 10 10 10	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company, and there is a number of them. This is the first in a series A. Yes, that is right. 2007. Qand they are A. I don't know. 2008. Qnoted as being RESP contributions for a number of people.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20	 S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't know anything to do with any finances to do with this company. 2019. Q. Okay. A. I have never seen bank statements. I have never been online. I don't know anything about the financials. 2020. Q. Well, I don't want to mislead you.
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 11 20 11 12 20 11 11 20 11 12 13 11 12 11 12 13 11 12 11 11 12 11 11 12 11 11 12 11 11	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company, and there is a number of them. This is the first in a series A. Yes, that is right. 2007. Qand they are A. I don't know. 2008. Qnoted as being RESP contributions for a number of people. A. Okay.	1 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't know anything to do with any finances to do with this company. 2019. Q. Okay. A. I have never seen bank statements. I have never been online. I don't know anything about the financials. 2020. Q. Well, I don't want to mislead you. I don't expect or anticipate that you will have
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 10 11 12 11 12 11 12 11 11 11 12 11 11 11	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company, and there is a number of them. This is the first in a series A. Yes, that is right. 2007. Qand they are A. I don't know. 2008. Qnoted as being RESP contributions for a number of people. A. Okay. 2009. Q. And I just want to give you the	$ \begin{array}{c} 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 22\\ 22\\ 22\\ 22\\ 22\\ 22\\ 22\\ 22$	 S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't know anything to do with any finances to do with this company. 2019. Q. Okay. A. I have never seen bank statements. I have never been online. I don't know anything about the financials. 2020. Q. Well, I don't want to mislead you. I don't expect or anticipate that you will have knowledge of the financials.
$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\17\\18\\9\\20\\22\\23\\24\end{array}$	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company, and there is a number of them. This is the first in a series A. Yes, that is right. 2007. Qand they are A. I don't know. 2008. Qnoted as being RESP contributions for a number of people. A. Okay. 2009. Q. And I just want to give you the names, and you can tell me if they are who these	$ \begin{array}{c} 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 9\\ 20\\ 21\\ 22\\ 23\\ \end{array} $	 S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't know anything to do with any finances to do with this company. 2019. Q. Okay. A. I have never seen bank statements. I have never been online. I don't know anything about the financials. 2020. Q. Well, I don't want to mislead you. I don't expect or anticipate that you will have knowledge of the financials. A. Okay.
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 10 11 2 3 11 2 1 12 11 2 11 2 11 11 2 11 11 11 2 11 11	S.R. Schlacht - 371 A. I didn't do any signing, so I don't know any 2003. Q. And furthermore, you tell me that you didn't review bank A. I didn't. 2004. Qstatements, either. A. So it is going to be no to every single thing that you show me. 2005. Q. Okay. So, let's just keep going, then. Tab 3 A. Yes? 2006. QDixit Holdings Inc. makes a series of payment to Industrial Alliance Company, and there is a number of them. This is the first in a series A. Yes, that is right. 2007. Qand they are A. I don't know. 2008. Qnoted as being RESP contributions for a number of people. A. Okay. 2009. Q. And I just want to give you the	$ \begin{array}{c} 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 22\\ 22\\ 22\\ 22\\ 22\\ 22\\ 22\\ 22$	 S.R. Schlacht - 373 A. Okay. 2017. Q. Okay? And the one that we are looking at right now is a payment to Mercedes-Benz Durham, \$60,973.44 in respect of what appears to be an automobile. The date is March 12, 2013. So, it is during the time period that you were working at Stellar Point? A. I never saw any transaction. 2018. Q. And you were a signing officer of Dixit Holdings, this bank account? A. Not at this time, I don't think. Like I said, and I will keep saying, though, I only ever wrote one cheque for a sewer company. I don't know anything to do with any finances to do with this company. 2019. Q. Okay. A. I have never seen bank statements. I have never been online. I don't know anything about the financials. 2020. Q. Well, I don't want to mislead you. I don't expect or anticipate that you will have knowledge of the financials. A. Okay.

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	Sheet 49 Page 190 S.R. Schlacht - 374		Page 192 S.R. Schlacht - 376	
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 13 14 5 6 7 8 9 21 22	 A. I know that there were a few company cars that were Mercedes, but I wouldn't be able to tell you how much they cost, or any of those details. 2022. Q. Okay. And when you say "company", which company are you referring to? A. I am notI think Dixit Holding had a few cars, just from conversation, like, just from knowledge, but I have never seen any documents. So, I wouldn't 2023. Q. Okay. Aknow for sure. 2024. Q. But did you see Mercedes-Benz cars that Mr. Dixit was driving, and yourself were driving around in? A. That my husband drove, yes, and I drove. 2025. Q. Okay. So, you didand they were Mercedes-Benz cars? A. They were Mercedes-Benz cars. 2026. Q. And do you know if they were from 	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 10 10 10 10 10 10 10 10 10 10 10 10 10	 drove on the weekends. 2032. Q. Okay. And what about Raj? A. I am not sure whether it was in his personal name or in Dixit Holding. 2033. Q. Okay. And the cars that you are referring to, does Mr. Dixit still have any of them? A. Like I said, I don't know if any of those were in Dixit HoldingsI don't know whether they are Dixit Holdings or not. 2034. Q. I appreciate that. A. But he doesn't have any of the company cars. 2035. Q. Okay. A. They were all given to the employees. 2036. Q. Okay. So, now, I want to ask you, how do you know that they were given to the employees? A. I don't know whether they were given or they were purchased. I don't know those details, but Raj doesn't have those vehicles anymore. 	
22 23	Mercedes-Benz Durham? A. I believe so, but I am not certain	22	2037. Q. Okay. But why do you believe that they were given to the company employees?	
24 25	where he 2027. Q. Okay.	24 25	A. That was just my understanding. 2038. Q. What is the basis for that	
	S.R. Schlacht - 375		Page 193 S.R. Schlacht - 377	
1 2 3 4 5 6 7 8	 Apurchased that. 2028. Q. And how many cars are we talking about? A. I don't know which onesI don't know. I don't know, because I don't know 2029. Q. Were there many? Like, more than ten? A. Well, Raj used to have an SUV and 	1 2 3 4 5 6 7 8	understanding? A. That they drove off with them on their last day. 2039. Q. Okay. And who is "they"? A. David Hooker andmaybe David Hooker is the only one. 2040. Q. All right. A. Yes.	
9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Mercedes, and he droveI don't know whether he leased it or he purchased it or was making payments, but he no longer has those vehicles. Those are the only two that I know that he personallythat were his. The rest of them, I don't know. 2030. Q. Okay. So, I just want to slow down and go through that again. We are talking about Dixit Holdings Inc., not A. I don't know. See, I know that some of the executives had company cars, but I don't know if they were purchased through Dixit Holdings or where they were purchased. 2031. Q. Okay. Which executives of which company, do you know, had company cars? 	9 10 11 12 13 14 15 16 17 18 19 20 21 22	 2041. Q. But it is your evidence that David Hooker drove off with a A. The last 2042. Qcompany car on his last day of work at Stellar Point? A. Yes, but I could be wrong 2043. Q. Right. Ajust going by what 2044. Q. And what make and model of car was it? A. That David HookerI think it was a Hondano, it was a minivan. 2045. Q. Do you know, was it a Mercedes? A. No. 	
23 24 25	A. Grant D'Eall drove a company car. I believe David Hooker drove a company car, and Chris had a car that I drove to and from Whitby, but he	23 24 25	2046. Q. Okay. Was it A. It was like a Honda or a Caravan. 2047. Q. Kia?	

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When S.R. Schlacht - 378 1 A. No. S.R. Schlacht - 378 2 2048. C. Ckay, Tab 5, in Exhibit B. this relates to a Dibt Höldings wire in the amount of syou ever heard of a C FEV LLC. Have you ever heard of a C FEV LLC in September 10 2064. Q. And do you have any knowledge. information or belef as to wing Dix Holdings Inc. 8 would be parying S3000 to C FEV LLC in September 10 2013 1 A. No. I have no. if a set set a service provider to Barnes River or 4 2056. Q. Do you know whether or not they are are aservice provider to Barnes River or 4 2056. Q. Isse. Ard ther similarity, tab 10, we see a receipt. Diat Holdings Inc. is pay and set S27 MOb UP Characspe Ventures Lid. Have youcan you tell me what that company, so 1 new no idea. 12 2053. Q. That doesn't assist? 4 N. No. N. Have no idea. 12 2057. Q. And bix Holdings Inc. is pay made? S.R. Schlacht - 379 12 2056. Q. And bix Holdings Inc. is pay made? S.R. Schlacht - 379 12 2057. Q. Mar bin on the next tab, tab 6, we are at April the tab, 2014. Holdings Inc. is pay made? S.R. Schlacht - 380 2057. Q		0		J J
1 A. No. 1 A. Inave no idea. 2 2048. O. O'kay. Tab 5, in Exhib B, this relates to a Duit Holdings win in the amount of \$33,000 U.S. to a company called C REV LLC. Have synthesis to a C REV LLC? 2006. O. And I understand that he may have been affiliated with RevStar Global. 7 2049. O. And do you have any knowledge, information or belief as to why Duit Holdings inc. 3 A. No. Inave no idea. 9 would be paying \$33,000 to C REV LLC. In September 2013? A. Inave no idea. 2065. O. But you were a director of RevStar Global. correct? 10 A. Inave no idea. 12 2056. O. Isse. And then similarly, tab 10, 12 12 2050. O. Do you know whether or not they are or or not have novie heard of that ne may have any knowledge. In thave no idea. 11 2066. O. Isse. And then similarly, tab 10, 12 12 2052. O. That were intered of that ne may have any knowledge. This have no idea. 12 2066. O. Use. And the dort passing. but 13 12 2052. O. That were intered of that the Barners Broker, or 16 2057. O. Okay. That Stat the Barners Broker, or 14 A. Inave no idea. 12 2056. O. Do you know wrath that relates to 2 A. No. Iam sorry. 12 2052. O. And Dixit Holdings line, is paying a rate Apol The rist, 2014. 2056. O. Do you know wrate that hat payment was are at Apol The rist, 2014. <		Sheet 50 Page 194 S.B. Schlacht - 378		
2 2048. O., Ckay, Tab 5, in Exhibit B, Ihis 2 2063. Q. So, you have never heard of that 3 relates to a Dixit Holdings wire into a mount of 4 3 A. No, I have not. 4 9 2063. Q. So, you have never heard of that aname? 7 2049. O. And do you have any knowledge. A. No, I have not. A. No, I have not. 9 would be paying \$33,000 to C REV LLC in September Global, correct? A. I have not idea. 10 2013? A. I have not idea. Global, correct? 11 A. I have not idea. Global, correct? B. Schart Hosting. 12 2050. O. Dy you know whether or not they are Global, correct? B. No. I have no idea. 12 C. G. That we no idea. Global, correct? M. No. I have no idea. 13 and strip a story. Global, correct? M. No. I have no idea. 14 A. I have no idea. M. No. I have no idea. M. No. I have no idea. 15 A. Inary now idea. M. No. I have no idea. M. No. I have no idea. 16 2051. O. O. Kay, Thark sin Mark of America. M. No. I have no idea. M. No. I have no idea. 2054. O. A. Mol With Holdings inc. is p	1		1	
3 relates to a Divit Holdings wire in the amount of \$33,000 US, to a company called C REV LLC. Have \$you ever heard of a C REV LLC? 3 name? 4 A. No, 1 here not. 7 2049. 0. And do you have any knowledge. a. Inave no idea. 2056. O. But you were a director of RevStar Global correct? 9 would be paying \$33,000 to C REV LLC? in September 2013? A. No, 1 here not. 11 A. Ihave no idea. 2056. O. But you were a director of RevStar Global correct? 12 2050. D. Oy ou know whether or not they are or were a service provider to Barners Broker, or 11 2066. Jese. And Ihen similarly, tab 10, 12 2051. C. Oray, thank you. 11 2066. Jese. And Ihen similarly, tab 10, 12 2052. C. Erif has pointed out that the C REV 18 A. Inave no idea. 13 Jess and Jank at the Barn of Amerca. No. I don fine and Amerca. No. I don fine and Amerca. 2054. O. And Dixit Holdings line. is paying a made? S.R. Schlacht - 379 2068. C. You don't know ore way or the other? 2055. O. Do you know what that traitates to ? S.R. Schlacht - 379 2068. C. You don't know ore way ary the other? 2057.	2		2	
4 \$33,000 US: to a company called C REV LLC. Have you ever heard of a C REV LLC? 4 A. No, I have not. 5 2064. Q. And i understand that he may have been affiliazed with NersSar Global? 7 2049. Q. And i understand that he may have been affiliazed with NersSar Global? 9 would be paying \$33,000 to C REV LLC in September 10 2013? 11 A. I have no idea. 2066. 12 2050. D. Dy ou know whether or not they are 13 or wrere a service provider to Barness Broker, or 14 A. Inave no. I have never heard of 15 that company. S1 16 2051. Q. Okay, thank you. 17 A. Inave no idea. 18 2052. Q. Chi have any knowledge of that company. S1 19 L2 appears to bark at the Bank of America. 20 A. Inave no idea. 11 20 A. Inave no idea. 12 21 2053. Q. And bren on the next tab, tab 6 we are at April the 1st, 2014. A. Inave no idea. 22 A. No. Idd not. S.R. Schlacht - 379 12068. Q. Hon't know whether				
5 you ever heard of a C REV LLC? 5 2064. Q. And lunderstand has he may have been affliated with RexStar Global? 7 2049. Q. And do you have any knowledge, information or belief as to why DWH Holdings Inc. 8 2065. Q. But you were a director of RevStar 9 would be paying S03.000 to C REV LLC in September 10 2013? A. I have no idea. 11 A. I have no idea. 2065. Q. But you were a service provider to Banners Broker, or 14 A. I have no idea. 13 almost \$207.000 by Dreamscape Ventures Ltd. Have is you cany out elline what I hat company is? 16 Do you know whether or not they are of the company, so I have no idea. 15 A. I have no idea. 17 2052. Q. Erin has pointed out that the C REV 18 A. I may nove heard of Dreamscape 12 2053. Q. And ther on the next tab, tab 6, we 2054. Q. Yeaser 100* 2 A. I have no idea. 2055. Q. And ther on the next tab, tab 6, we 22 Yeaser 10* S.R. Schlacht -379 1 2055. Q. And ther on the		\$33,000 U.S. to a company called C REV LLC. Have	4	
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7 2049. Q. And do you have any knowledge, information or belief as to why Dixt Holdings inc. 7 A. I have no idea. 9 would be paying 353.000 to C REV LL C in September 10 2013? A. I have no idea. 11 A. I have no idea. 10 2050. Q. Do you know whether or not they are or where a service provider to Banners Broker, or 11 2066. Q. I see. And then similarly, tab 10, we see a receipt. Dixit Holdings Inc. is paid antrost \$267,000 by Dreamscape Ventures Ld. Have end if antrost \$267,000 by Dreamscape Ventures Ld. Have end if a tarbor starbor in the are do if a tarbor starbor in the are do if a tarbor starbor in the are end if in passing, but 11 11 2052. Q. Erin has pointed out that the C REV 11 10 A. I have no idea. 12 2054. Q. And then on the next tab, tab 6, we are at Anofi the sith in nere. But, 2014. A. I have no idea. 21 2055. Q. And Dixit Holdings Inc. is paying raive based if the company. 2068. Q. Have you ever hard a discussion with. have you ever discusseddid Dreamscape Wentures Ld. have anything bot do with Banners Broker. 2015. 2 A. Mitmm. S.R. Schlacht-379 1 2055. Q. And Dixit Holdings Inc. is paying Rajiv Dixit, it would appear, just ower \$150,000? 3 A. Okay. 4 2055. Q. And Dixit Holdings Inc. 58.R. Schlacht-381 2056. Q. Do you know what that relates to? A. No, law ene wi		A. No.	6	been affiliated with RevStar Global?
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13 or were a service provider to Banners Broker, ör 13 almost \$257,000 by Dreamscape Ventures Ltd. Have 14 A. I have noI have never heard of 14 youcan you tell me what that company, si? 15 that company, so I have no idea. 15 A. No, I am sorry. 16 2051. Q. Okay, thank you. 16 2067. Q. You have never heard of Dreamscape 17 A. I am sorry. 16 2067. Q. You have never heard of Dreamscape 17 A. I have no idea. 17 No. I am sorry. 18 2053. Q. That doesn't assist? 21 2068. A. Have you ever had a discussion 21 2054. Q. And then on the next tab, tab 6, we 23 Wentures Ltd. have any thowledge of that company. 21 2055. Q. And their on the next tab, tab 6, we 24 are at April the tst, 2014. 25 22 Rajiv Dixit, it would appear, just over \$150,000? A. I have no idea. 12 2069. Q. You don't know, when whetherand, so, 5 2055. Q. Do you know what that relates to? A. I have no idea. 2071. Q. And do you know whetherand, so, 5 2058. Q. Do you know any thing about	12			we see a receipt. Dixit Holdings Inc. is paid
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		A. Yes?	23	
25 tell me who Mr. Eric Swaim is? [25 2077. Q. We see a \$23,000 payment by Dixit	24	2062. Qto a Mr. Eric Swaim. Can you	24	
	25	tell me who Mr. Eric Swaim is?	25	2077. Q. we see a \$23,000 payment by Dixit

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	Sheet 51 Page 198		Page 200
1	S.R. Schlacht - 382		S.R. Schlacht - 384
1	Holdings to Paymaster Corporation. Have you ever	1 1	white tab in the brief, and I want to take you to a
	heard of Poymaster Corporation?		few Stellar Point documents. The tab is marked with
2	heard of Paymaster Corporation?		
3	A. No, I haven't.	3	an account number ending in
4	2078. Q. And to your knowledge, Paymaster	4	A. Okay.
5	Corporation never had any business dealings with	5	2091. Qand
6	Banners Broker group companies?	6	A. I don't have anything after that.
7	A. I have never heard of Paymaster.	7	It just goes right tono, I do, sorry.
8	So, I don'tI can't answer that. I have never	8	2092. Q. Okay. There is a Stellar
9	heard of that company.	9	Pointand I am asking you because you were Mr.
10	2079. Q. And with reference to the next tab	10	Dixit's personal assistant.
11		111	A. Okay.
	12 A Voo?		
12	A. Yes?	12	2093. Q. Is receiving \$79,985 from Milan
13	2080. Qhave you heard of an individual	13	Holdings Limited?
14	by the name of John Colavita?	14	A. Okay.
15	A. No, I have not.	15	2094. Q. Do you have any knowledge,
16	2081. Q. So, you wouldn't be aware why he may	16	information or belief as to why Milan would have
17	have made a \$79,985 loan to your company?	17	made that payment that we see documented?
18	A. No idea.	18	A. I never saw any bank accounts for
19	2082. Q. And I say your company, Dixit	19	Stellar Point, but being his assistant, I don't
20	Holdings Inc.?	20	remember ever hearing that name.
21	A. I understand why you say that, but I	21	2095. Q. Okay. And then behind tab 2, and
22	have also explained the reason why I am on that	22	also a Stellar Point document, we have gotwe see
23		23	also a Stellar Folin uocument, we have you we see
	company.	20	an indication that Strategy India was paid \$42,000
24	2083. Q. Okay. Do you know whetherand,	24	U.S. dollars by Stellar Point on January the 4th,
25	so, you wouldn't know whether that loan was ever	25	2013.
	Page 199	¹ ¹	Page 201
	S.R. Schlacht - 383		S.R. Schlacht - 385
1	repaid?	1	A. M'hmm.
2	A. I have no idea.	2	2006 O Do you can you tall up what
3	2084. Q. Or was advanced?		2096. Q. Do youcan you tell us what
		3	
4		3	Strategy India may have done for Stellar Point?
45	A. No. I don't know anything about	3	Strategy India may have done for Stellar Point? A. I don't know exactly what they did.
	A. No. I don't know anything about this. The only loan I know about is the one that I	3 4 5	Strategy India may have done for Stellar Point? A. I don't know exactly what they did. I do know what Strategy India is. It is a company
4 5 6 7	A. No. I don't know anything about this. The only loan I know about is the one that I loaned my husband.	3	Strategy India may have done for Stellar Point? A. I don't know exactly what they did. I do know what Strategy India is. It is a company that operates in India about recognizing true MLMs
6 7	 A. No. I don't know anything about this. The only loan I know about is the one that I loaned my husband. 2085. Q. And then behind the last tab in the 	3 4 5 6 7	Strategy India may have done for Stellar Point? A. I don't know exactly what they did. I do know what Strategy India is. It is a company that operates in India about recognizing true MLMs from scams, and I am not surelike, that, I know
6 7 8	 A. No. I don't know anything about this. The only loan I know about is the one that I loaned my husband. 2085. Q. And then behind the last tab in the section, tab 13, we see Dixit Holdings Inc. making a 	3 4 5 6 7 8	Strategy India may have done for Stellar Point? A. I don't know exactly what they did. I do know what Strategy India is. It is a company that operates in India about recognizing true MLMs from scams, and I am not surelike, that, I know what Strategy India is. I am not sure the work they
6 7 8 9	 A. No. I don't know anything about this. The only loan I know about is the one that I loaned my husband. 2085. Q. And then behind the last tab in the section, tab 13, we see Dixit Holdings Inc. making a \$15,000 payment to a vending machine company. 	3 4 5 6 7 8 9	Strategy India may have done for Stellar Point? A. I don't know exactly what they did. I do know what Strategy India is. It is a company that operates in India about recognizing true MLMs from scams, and I am not surelike, that, I know what Strategy India is. I am not sure the work they did for Stellar Point, though.
6 7 8 9 10	 A. No. I don't know anything about this. The only loan I know about is the one that I loaned my husband. 2085. Q. And then behind the last tab in the section, tab 13, we see Dixit Holdings Inc. making a \$15,000 payment to a vending machine company. A. Okay. 	3 4 5 6 7 8 9	Strategy India may have done for Stellar Point? A. I don't know exactly what they did. I do know what Strategy India is. It is a company that operates in India about recognizing true MLMs from scams, and I am not surelike, that, I know what Strategy India is. I am not sure the work they did for Stellar Point, though. 2097. Q. Okay. And you never dealt with
6 7 8 9 10 11	 A. No. I don't know anything about this. The only loan I know about is the one that I loaned my husband. 2085. Q. And then behind the last tab in the section, tab 13, we see Dixit Holdings Inc. making a \$15,000 payment to a vending machine company. A. Okay. 2086. Q. Do you have any knowledge, 	3 4 5 6 7 8 9 10 11	 Strategy India may have done for Stellar Point? A. I don't know exactly what they did. I do know what Strategy India is. It is a company that operates in India about recognizing true MLMs from scams, and I am not surelike, that, I know what Strategy India is. I am not sure the work they did for Stellar Point, though. 2097. Q. Okay. And you never dealt with Strategy India yourself, did you?
6 7 8 9 10 11 12	 A. No. I don't know anything about this. The only loan I know about is the one that I loaned my husband. 2085. Q. And then behind the last tab in the section, tab 13, we see Dixit Holdings Inc. making a \$15,000 payment to a vending machine company. A. Okay. 2086. Q. Do you have any knowledge, information or belief as to why Dixit Holdings may 	3 4 5 6 7 8 9 10 11 12	Strategy India may have done for Stellar Point? A. I don't know exactly what they did. I do know what Strategy India is. It is a company that operates in India about recognizing true MLMs from scams, and I am not surelike, that, I know what Strategy India is. I am not sure the work they did for Stellar Point, though. 2097. Q. Okay. And you never dealt with Strategy India yourself, did you? A. No, I did not.
6 7 8 9 10 11 12 13	 A. No. I don't know anything about this. The only loan I know about is the one that I loaned my husband. 2085. Q. And then behind the last tab in the section, tab 13, we see Dixit Holdings Inc. making a \$15,000 payment to a vending machine company. A. Okay. 2086. Q. Do you have any knowledge, information or belief as to why Dixit Holdings may have done that? 	3 4 5 6 7 8 9 10 11 12 13	Strategy India may have done for Stellar Point? A. I don't know exactly what they did. I do know what Strategy India is. It is a company that operates in India about recognizing true MLMs from scams, and I am not surelike, that, I know what Strategy India is. I am not sure the work they did for Stellar Point, though. 2097. Q. Okay. And you never dealt with Strategy India yourself, did you? A. No, I did not. 2098. Q. And then the next white tab in the
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	Sheet 52 Page 202 S.R. Schlacht - 386		Page 204 S.R. Schlacht - 388	
1	these are your biweekly paycheques?	1	A. I am not sure.	
2	A. That is correct.	2	2116. Q. Okay. What things did you see her	
3	2103. Q. And just flipping through them, do	3	doing at the office?	
4	they reflect what you were paid in compensation by	4	A. She would help clean, and sometimes	
5	Stellar Point during this period? A. They do.		she would come and help cook, but I am not sure if	
7	2104. Q. Okay. And you didn't receive	4 5 6 7	she was getting paid to do that or not. 2117. Q. Okay. The next tab is tab 4. We	
8	anyapart from what you told us when we met in	8	see a \$1,000 payment to Peter Dixit.	
9	April, compensation apart from what you were paid by	9	A. Yes.	
10	way of salary?	10	2118. Q. Can you tell me who Peter Dixit was?	
11	A. No, I did not.		A. That is Ŕajiv's dad.	
12	2105. Q. And then the next tab in the brief,	12	2119. Q. Okay. And this cheque doesn't have	
14	tab 2 A. M'hmm.	14	a re line. Did you ever see him around the office doing work for Stellar Point?	
15	2106. Qwe see a series of Stellar Point	15	A. Yes, he would come in to help with	
16	cheques made out to Rajiv Dixit. And if you could	16	cooking and things like that. He did a few odd	
17	just flip through them, I have a general question.	17	jobs. But, like I said, I am not sure if he was	
18	A. Okay.	18	ever compensated for it.	
19	2107. Q. You will see the amounts vary	19	2120. Q. Okay. And, in fact, you didn't know	
20 21	widely. A. Yes.	20	that either Gloria or Peter were being compensated until I showed you these cheques?	
22	2108. Q. And they include a \$20,000 Christmas	22	A. I did not.	
23	bonus. Did you haveas Mr. Dixit's personal	23	2121. Q. And then over the page, tab 5, we	
24	assistant, did you have anywere you aware of what	24	see a cheque for \$10,000 to Reema Sukumaran?	
25	he was being paid by the company?	25	A. Sukumaran. Yes, that is Raj's	
	Page 203 S.R. Schlacht - 387]	Page 205 S.R. Schlacht - 389	
1	A. No, I was not.	1	sister.	
2	2109. Q. And would that be Jeanette Kennedy's	2	2122. Q. This is Raj's sister?	
3	signature on some of these cheques? Do you	3	A. That is correct.	
4	recognize that?		2123. Q. And do you have any knowledge,	
5	A. The J. Kennedy 2110. Q. Yes.	5	information or belief as to why Stellar Point would be paying Raj's sister \$10,000?	
	Ayes, that is Jeanette's		A. It says here a loan, but I have no	
8	signature.	8	idea.	
9	2111. Q. Do you know who else had signing	9	2124. Q. Okay. And then the next tab, tab 6,	
10	authority, apart from Jeanette and Raj?	10	there is bank statements that reflect a number of	
11	A. I am not sure. 2112. Q. Okay. Tab 3, Stellar Point is	11	what would appear, and perhaps you have more	
13	2112. Q. Okay. Tab 3, Stellar Point is paying a small amount to Gloria Dixit. Do you know	13	knowledge to the personal expenses that are going through Stellar Point.	
14	Gloria Dixit to be Raj's mother?	14	A. Okay.	
15	A. That is Raj's mom, yes.	15	2125. Q. Things like Toys 'R' Us andI	
16	2113. Q. And do you have any idea what this	16	mean, you can see them for yourself. Baskin	
17	payment was for?	17	Robbins	
18 19	A. I am not sure. I know she did some odd things around the office. So, maybe she was	18 19	A. I have never seen any bank statements, so I have no idea.	
20	paid for that, but I am not sure.	20	2126. Q. Okay.	
21	2114. Q. And in fairness, it does say	21	A. I know sometimes, like, if there was	
22	"payroll" on the re line of the cheque.	22	a Christmas party, I know that he would buy, like,	
23	A. M'hmm.	23	little presents for the kids. So, I am not sure if	
24	2115. Q. Did she also work at Stellar Point,	24 25	thatbut, like I said, I have never seen any bank	
25	or was it just the odd things around the office?	20	statements. So, I wouldn't be able to	

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Sheet 53 Page 206	Page 208
S.R. Schlacht	
1 2127. Q. Right.	1 2141. Q. Well, why don't you tell me what
2 Averify.	2 they were?
3 2128. Q. La Senza is another one. You	
4 have any information	
5 A. I don't think that would be an	4 2142. Q. Okay. So, I mean, we are talking 5 somein fairness, we are talking some pretty big
6 employee gift, but I have no idea.	6 numbers, in terms of
7 2129. Q. Okay.	7 A. Yes, but for the
8 A. It wasn't given to me.	8 2143. Qpayments to Oshawa Jewellers?
9 2130. Q. Ricki's is another one.	9 A. Yes. They probably would be
10 A. I am sorry, I don't know.	10 expensive, because I think the pins that we had made
11 2131. Q. Okay.	11 for Niagara and a few other conventions, those are
12 A. You never know. With my husbal	
13 don't think so. Does he have a secret life I do	
14 know about?	14 International. So, I would see them being, like,
15 2132. Q. Okay.	15 quite a nice pin, but like I said, I am not sure how
16 A. Perhaps it was CRA, he was audi	
17 by CRA, so I am sure if there is little expense	es, 17 2144. Q. But in terms of the pins, you were
18 they picked up on it, like his lingerie habit.	18 involved in obtaining them, right? From
19 2133. Q. Tab 7.	19 A. No
20 A. Yes?	20 2145. Q. No?
21 2134. Q. More seriously	21 AI never picked them up.
22 A. Okay.	22 2146. Q. Who was responsible for that?
23 2135. Qthis, on my reading, shows a	
24 payment of almost \$36,550	24 2147. Q. Who was responsible for ordering
	25 them?
	Page 209
S.R. Schlacht	- 391 S.R. Schlacht - 393
1 2136. Qthat is the number to Oshawa	a 1 A. Probably Raj, yes.
2 Jewellers, a Stellar Point payment. And	2 2148. Q. Are you aware of Mr. Dixit
3 furthermore, there is other cheques to Oshaw	
4 Jewellers thatand bank drafts	
5 A. Yes.	4 A. I have no idea. 5 2149. Q. Apart from the pins?
6 2137. Qfor a total of, I believe,	6 A. I have no idea.
7 another \$92,711?	7 2150. Q. Okay. Do you know where he
8 A. Yes.	8 purchased his watches from?
9 2138. Q. Do you have any knowledge,	9 A. I have no idea.
10 information or belief as to what that relates to	
11 A. I have no idea what the cost of	11 additional RESP payments this time from Stellar
12 things were, but I know when Banners Broker	
13 conventions, Stellar Point had Oshawa Jewell	
14 some pins that were, like, given out to the top	
15 sellers and all that. So, I am not sure of the	15 account of Rajiv Dixit? Is there a junior Mr. Rajiv
16 cost. I never saw financials, but I know that	16 Dixit who would have an RESP?
17 Oshawa Jewellers did make things	17 A. He has a son. Like, we have a son,
18 2139. Q. Right.	18 Rajiv Dixit, but I am not sure if he has an RESP or
19 Athat Stellar Point purchased for	19 not.
20 Banners Broker.	20 2153. Q. Okay. Do you know whether or not
	23 2154. Qany RESPs?
	$\begin{bmatrix} 20 & 2104. \\ 0. \\ 0. \\ 0. \\ 0. \\ 0. \\ 0. \\ 0. \\$
24 A. Lapel, like, you mean, just going 25 on, like, right here?	24 A. I have no idea. 25 2155. Q. Can you think of any reason why

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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 15 16 17 18 9 20 21 22 23 24 25	heet 54 Page 210 S.R. Schlacht - 394 Stellar Point should be contributing to Rajiv's RESP? A. I don't know that side of the business, so you would have to ask Raj. 2156. Q. And I don't know how old Rajiv is, but did he work for Stellar Point? A. No. His son? 2157. Q. Yes. A. Well, he is five, so 2158. Q. So, the answer is no? A. Unless he is a genius. 2159. Q. An RESP contribution, we see in the same tab, next document A. Yes. 2160. Q. A. Ungelia. 2161. Q. Ungelia. Dixit? A. Yes. 2162. Q. Can you tell me who that is, please? A. That is his daughter. 2163. Q. Okay. And the same questions that I asked you in respect of his son, I take it you would give me the same answers? A. That is correct. 2164. Q. Behind tab 9, we see a total of	$\begin{array}{ c c c c c c c c c c c c c c c c c c c$	 Page 212 S.R. Schlacht - 396 from Stellar Point's account, and I am just wondering if you can assist the receiver in understanding what automobile may have been purchased, for whom and why. A. I can't say for sure, but if it is Honda, I am thinking that would be the vehicle that David Hooker drove. 2172. Q. Okay. The one that he drove away on his last day? Okay. MS. DOSANJH: I just have an image of someone driving off with the last name of Hooker. 2173. MR. WARD: Yes. BY MR. WARD: 2174. Q. And then the next tab, just while we are on cars, tab 11 A. Yes? 2175. Qwe see a little over \$22,000 by way of bank draft from Stellar Point being paid to Durham Kia? A. Okay. 2176. Q. And can you assist the receiver in understanding that transaction? A. I have no idea. I see Jeanette's
$ \begin{array}{cccccccccccccccccccccccccccccccccccc$	sige 211 S.R. Schlacht - 395 \$248,000 in Stellar Point payments to Mercedes-Benz Durham between July and September 2012. A. A. Okay. 2165. Q. Do you have anycan you assist us further with respect to what cars were purchased and where they might be now? A. I have no idea. 2166. Q. Okay. And as Mr. Dixit's personal assistant, when it came to purchasing things like automobiles, I take it you wouldn't have had any involvement in that personally? A. No, I did not. 2167. Q. Who would do that? A. You would have to ask Raj. 2168. Q. Okay. So, it would have been Raj personally? A. I don't know. 2169. Q. Okay. You can't think of anyone else A. I don't know. 2170. Q. apart from Raj A. I don't think there would be anyone else, no. I don't think there would be anyone else, no. 2171. Q. Okay. And then tab 10, there is \$54,626 that seems to go to Whitby Oshawa Honda,	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 11 2 1 5 6 7 8 9 10 11 12 1 3 11 12 1 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	 Page 213 S.R. Schlacht - 397 signature, so she would probably be better to ask. I have never seen this. 2177. Q. Okay. Do you know whether Jeanette or anyone else at Stellar Point used a Kia for business purposes? A. No. 2178. Q. You never saw anyone at Stellar Point using a Kia for businesses purposes? A. Not to my knowledge. 2179. Q. And then tab 12, this appears to be an auto financing payment to TD Auto Finance for \$5,197? A. Yes. 2180. Q. Is there anything that you can say that might assist us in understanding what was being financed here, or why this payment was being made? A. I have no idea. 2181. Q. At Stellar Point's account at this time? No? A. I don't know. 2182. Q. And then at the very next tab, tab 13, \$2,600 payment to Owasco VW? A. I have no idea. 2183. Q. No information as to what this might relate to?

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	Sheet 55 Page 214		Page 216
	S.R. Schlacht - 398		S.R. Schlacht - 400
1	A. No.	1	started, Kul got in an accident, or Chris, I don't
2	2184. Q. Did anyone at Stellar Point, working		remember who it was, but I know someone got in an
3	at Stellar Point to your knowledge use a VML a	23	accident. But I couldn't tell you if this was the
ſ	at Stellar Point, to your knowledge, use a VW, a		•
4	Volkswagen for employment purposes?	4	one.
5	A. A Volkswagen?	4 5 6	2198. Q. Okay. Were you ever involved in an
6	2185. Q. Yes.	6	accident in a Banners Broker car?
7	A. I don't know.	7	A. I backed up into a pole once, but it
8	2186. Q. Okay.	8	only made a little ding.
9	A. I don't remember. I don't, sorry.	9	2199. Q. Okay.
10	2187. Q. Or an Audi?	10	A. But, no, not a huge accident.
11	A. An Audi?		A. Dui, no, not a nuge according.
		11	2200. Q. Okay, good. So, with reference to
12	2188. Q. Audi?	12	the insurance payout, you have no
13	A. Sorry, I wasn't trying to correct	13	A. I have no recollection of this.
14	you. I don't know.	14	2201. Q. Yes, okay. And then tab 16, you may
15	2189. Q. Did you have a company car?	15	be able to help us because it is a payment from
16	A. No. ChrisI borrwed Chris' car.	16	Stellar Point of \$196,000 and change
17	2190. Q. Okay. So, during the 15 months,	17	A. Yes.
18	approximately 15 months that were at Stellar	18	2202. Qand the indication is "Re ACS air
19	Point	19	charter service"
20	A. Yes?	20	A. That
21	2191. Qdid you always have use of a	21	2203. Q. Did this relate to the trip to
22	company car?	22	Israel and Cyprus that you
23	A. I either GO trained in, or Raj would	23	A. Yes.
24	lend me his car, or I would borrow Chris' car	24	2204. Qarranged?
25	2192. Q. Okay.	25	A. Yes. I mean, it looks that way. I
	Page 215		Page 217
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1	S.R. Schlacht - 399		S.R. Schlacht - 401
1	S.R. Schlacht - 399 Abut, no, I didn't personally have	1	S.R. Schlacht - 401 didn't personally do this, but
1	S.R. Schlacht - 399 Abut, no, I didn't personally have my own company car.	1	S.R. Schlacht - 401 didn't personally do this, but 2205. Q. You didn't personally make out the
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	S.R. Schlacht - 399 Abut, no, I didn't personally have my own company car. 2193. Q. And when you say "borrow Chris' car", I take it you just borrow it and use it day in and day out A. He 2194. Qand then perhaps return it to him on weekends? A. It would either belike, he didn't like to drive very much. So, if he needed it, I would drop it off at his office, and then just walk home because I live downtown. If he didn't need it during the week, I would just drop it off Friday after work and pick it up Monday morning. 2195. Q. Okay, thank you. And then on tab 15 A. Yes? 2196. Qthere is a cheque payable to Stellar Point from an insurance company A. Yes? 2197. Qand the total amount is \$99,523. The receiver believes that this may have been an insurance payout in respect of a car that was	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\17\\8\\9\\21\\22\\23\end{array}$	S.R. Schlacht - 401 didn't personally do this, but 2205. Q. You didn't personally make out the bank draft? A. I didn't have any signing authority on Stellar Point. 2206. Q. Okay. But you believe that this was payment on account for the air charter? A. Looks that way, yes. 2207. Q. Okay. And then tab 17, Stellar Point is making, it would appear, a payment to Washington County Circuit Court. Do you see that? A. No. 2208. Q. It is right A. Oh, yes, I do. 2209. Q. Okay. And can you assist us with what that business purpose or other purpose of that payment may be? A. I have never heard of that, so I have no idea. 2210. Q. And then within the same tab, Stellar Point is also making a payment to the Oregon State Police. Can you assist us in understanding what the business or other purpose of that payment
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Page 218S.R. Schlacht - 4021this, but I have no idea.22211.Q. Okay. This is the one?3A. Yes.42212.Q. Okay.5A. Yes.I don't know that at all.6Yes, no clue.72213.Q. Do you know whether or not anyone at8Stellar Point had any interactions with U.S. law9enforcement, such that these payments would be10required to be made?11A. Not to my knowledge.122214.13it would appear, \$20,000 remittance from ERS Club,14payment detail stocks.15A. Ihave no idea.162215.17A. No, I haven't.182216.182216.182216.2216.Q. Tab 19, Stellar Point would appear182216.10Rever heard of ERS Club?17A. No, I haven't.182216.2216.Q. Tab 19, Stellar Point would appear18A. Never heard of it.	ash I
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 A. Yes. 2212. Q. Okay. A. Yes. I don't know that at all. Yes, no clue. 2213. Q. Do you know whether or not anyone at Stellar Point had any interactions with U.S. law enforcement, such that these payments would be required to be made? A. Not to my knowledge. 2214. Q. Tab 18. Stellar Point is receiving, it would appear, \$20,000 remittance from ERS Club, payment detail stocks. A. I have no idea. 2215. Q. You have never heard of ERS Club? A. No, I haven't. 2215. Q. You have never heard of ERS Club? A. No, I haven't. A. Yes, I don't know who that is. A. No, I haven't. 	l
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6Yes, no clue.6the72213.Q.Do you know whether or not anyone at Stellar Point had any interactions with U.S. law enforcement, such that these payments would be required to be made?7A.I have no idea, then.10required to be made?82228.Q.Okay.Have you ever heard of Ne11A.Not to my knowledge.9Hope SDA Church?122214.Q.Tab 18. Stellar Point is receiving, it would appear, \$20,000 remittance from ERS Club, payment detail stocks.112229.Q.And then Stellar Point behind the next tab, 2113it would appear, \$20,000 remittance from ERS Club, payment detail stocks.13A.Yes?15A.I have no idea.142230.Qis paying, it would appear, \$4,030 to C REV Shore Brand Media.162215.Q.You have never heard of ERS Club?16A.Yes, I don't know who that is.17A.No, I haven't.172231.Q.And you have never heard of them	9W
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16 2215. Q. You have never heard of ERS Club? 16 A. Yes, I don't know who that is. 17 A. No, I haven't. 17 2231. Q. And you have never heard of them	
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17 A. No, I haven't. 17 2231. Q. And you have never heard of them	0
	.0
LIX ZZIN U LAD LY STEllar POIDT WOULD ADDEAR LL 1X A MEVER DEARD OF IT	If
	af.
19 to be making a \$42,000 certified cheque to a Kelly 19 2232. Q. So, again, you wouldn't be aware	01
20 Stinson?	
21 A. Yes. 21 Stellar Point, or Banners Broker business?	
22 2217. Q. Do you know who Kelly Stinson is? 22 A. No.	
23 A. The name sounds familiar, but I have 23 2233. Q. Okay. And then tab 22	
24 no idea	
25 2218. Q. Okay. 25 2234. Qthere is an \$85,000 certified	
Page 219 Page 221 Page 221	0.5
S.R. Schlacht - 403 S.R. Schlacht - 403	
Awhat it would be.	rrom
2 2219. Q. But do you know Kelly Stinson? 2 Banners Broker Limited	
3 A. The name sounds familiar, but I 3 A. M'hmm.	
4 don't know 4 2235. Qto Banners Broker Limited. Was	;
5 2220. Q. Okay. 5 thisdo you know anything about this?	
6 Awhat Kelly Stinson 6 A. No idea.	
7 2221. Q. And sitting here today, you don't 7 2236. Q. Did Stellar Point pay its employees	S
8 recall ever meeting or speaking to Kelly Stinson? 8 in cash at any time, to your knowledge?	
9 A. No. 9 A. Not to my knowledge, no.	
10 2222. Q. Okay. And, so, you cannot assist us 11 2237. Q. And you were never paid in cash,	
11 in terms of why this payment may have been made by 11 correct?	
12 Stellar Point? 12 A. Always paycheque.	for
13 A. No, I can't. 13 2238. Q. The payroll cheques that we have	101
14 2223. Q. And then tab 20? 14 you, Stephanie, start around August of 2012?	
15 A. Yes.	ina
16 2224. Q. A \$5,000 payment by Stellar [16 2239. Q. And we know that you started work	
17 Pointno, from New Hope SDA Church to Banners 17 at Stellar Point and Banners Broker Limited in Ma	ıy
18 Broker Limited 18 of 2012?	
19 A. This, I am pretty surethis is 19 A. I	
20 from the church, right? [20 2240. Q. So	
21 2225. Q. Yes. [21 A. Go ahead.	
A. So, when you are donating to a 22 2241. Q. So, did the May to the August 2012	
23 church, you donatesay you were donating a bunch 23 period, who waswhich bank account were you	Jeing
24 of computer stuff, or a bunch of whatever. 24 paid from? Do you know? Do you have any way	01
25 2226. Q. Right. 25 determining for us?	

	0)		Dama 22/	4
	Sheet 57 Page 222 S.R. Schlacht - 406		Page 224	S.R. Schlacht - 408
1	A. I am pretty sure I was always paid	1		MS. DOSANJH: The bank will give it to
2	by Banners Broker Limited, which is Stellar Point.	2		YOU.
23	2242. Q. Right. No, I appreciate that, and	3		THE DEPONENT: Yes, that is no problem.
4	vou are also cortain that you were not paid in cash	4	2251.	MR. WARD: Or you can authorize Gillian
	you are also certain that you were not paid in cash	5	2201.	
5 6 7	during the May to August 2012?			and she can ask for it on your behalf,
0	A. I was never paid cash.	6		whatever you
	2243. Q. Okay. Do you have any way of			MS. DOSÁNJH: I can draft an
8	checking and letting us know on which account you	8		authorization and direction, and then you
9	were paid from during the May to August 2012	9		canl can get her to sign it
10	A. Yes, I can pull up my bank	10	2252.	MR. WAŘD: Thank you.
11	statements.	11		MS. DOSANJH:and send it over, or if
12	2244. Q. Thank you.	12		you have one
13	A. Yes.	13		THE DEPONENT: Okay.
14	2245. MR. WARD: And, Counsel, can I have that	14		MS. DOSANJH:just let someone know
15	as an undertaking?	15		you want an authorization and direction.
16	MS. DOSANJH: Yes, an undertaking to	116		She is here and can sign it so you are
17	provide bank account statements for any	17		authorized to get what you would like.
18	transactions or any payments from Banners	18	2253.	MR. WARD: Well, we may be able toI
19	Broker given to Stephanie?	19		just have, probably, five more minutes.
20	2246. MR. WARD: Yes.	20		MS. DOSANJH: Okay.
21	MS. DOSANJH: Is that what you are	21	2254.	MR. WARD: Yes.
22	looking for?	22		MS. DOSANJH: That is fine.
23	2247. MR. WARD: Please, yes.	23		
24	MS. DOSANJH: Okay, yes.	24	BY MR.	WARD [.]
25	2248. MR. WARD: Particularly during the May	25	2255.	Q. Tab 23. We understand, based on our
	Page 223		Page 225	
	Page 223 S.B. Schlacht - 407	7/	Page 225	
	S.R. Schlacht - 407			S.R. Schlacht - 409
1	S.R. Schlacht - 407 to August 2012 time period.	1	revie	S.R. Schlacht - 409 ew of CIBC bank records, that between July of
1	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes.	1	revie 2012	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just
1 2 3	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay.	1 2 3	revie 2012 unde	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.?
1 2 3	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually	1 2 3 4	revie 2012 unde Can	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc.
1 2 3 4 5	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually won't indicate the account number	1 2 3 4 5	revie 2012 unde Can	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc. , or is?
1 2 3 4 5 6	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually won't indicate the account number necessarily.	1 2 3 4 5 6	revie 2012 unde Can was,	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc. , or is? A. I have no idea.
1 2 3 4 5 6 7	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually won't indicate the account number necessarily. MS. DOSANJH: Okay.	1 2 3 4 5 6 7	revie 2012 unde Can was, 2256.	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc. , or is? A. I have no idea. Q. So, similarly, you have no
1 2 3 4 5 6 7 8	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually won't indicate the account number necessarily. MS. DOSANJH: Okay. THE DEPONENT: So	1 2 3 4 5 6 7 8	revie 2012 unde Can was, 2256. infor	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc. , or is? A. I have no idea. Q. So, similarly, you have no mation as to why those payments may have been
1 2 3 4 5 6 7 8 9	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually won't indicate the account number necessarily. MS. DOSANJH: Okay. THE DEPONENT: So MS. DOSANJH: Do you want to specify the	1 2 3 4 5 6 7 8 9	revie 2012 Unde Can was, 2256. infor mad	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc. , or is? A. I have no idea. Q. So, similarly, you have no mation as to why those payments may have been e, or what services they may have provided to
1 2 3 4 5 6 7 8 9 10	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually won't indicate the account number necessarily. MS. DOSANJH: Okay. THE DEPONENT: So MS. DOSANJH: Do you want to specify the account number that you are looking for?	1 2 3 4 5 6 7 8 9 10	revie 2012 Unde Can was, 2256. infor mad	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc. , or is? A. I have no idea. Q. So, similarly, you have no mation as to why those payments may have been e, or what services they may have provided to ar Point?
1 2 3 4 5 6 7 8 9 10 11	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually won't indicate the account number necessarily. MS. DOSANJH: Okay. THE DEPONENT: So MS. DOSANJH: Do you want to specify the account number that you are looking for? MS. CRADDOCK: The cancelled cheque.	1 2 3 4 5 6 7 8 9 10 11	revie 2012 unde Can was, 2256. infor mad Stell	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc. , or is? A. I have no idea. Q. So, similarly, you have no mation as to why those payments may have been e, or what services they may have provided to ar Point? A. No, I do not.
1 2 3 4 5 6 7 8 9 10 11 12	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually won't indicate the account number necessarily. MS. DOSANJH: Okay. THE DEPONENT: So MS. DOSANJH: Do you want to specify the account number that you are looking for? MS. CRADDOCK: The cancelled cheque. The bottom would have the account number.	1 2 3 4 5 6 7 8 9 10 11 12	revie 2012 unde Can was, 2256. infor mad Stell 2257.	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc. , or is? A. I have no idea. Q. So, similarly, you have no mation as to why those payments may have been e, or what services they may have provided to ar Point? A. No, I do not. Q. And furthermore, Michael Spalding is
1 2 3 4 5 6 7 8 9 10 11 12 13	S.R. Schlacht - 407 to August 2012 time period. THE DEPONENT: Yes. MS. DOSANJH: Okay. MS. CRADDOCK: The statements actually won't indicate the account number necessarily. MS. DOSANJH: Okay. THE DEPONENT: So MS. DOSANJH: Do you want to specify the account number that you are looking for? MS. CRADDOCK: The cancelled cheque.	1 2 3 4 5 6 7 8 9 10 11 12 13	revie 2012 unde Can was, 2256. infor mad Stell 2257. asso	S.R. Schlacht - 409 ew of CIBC bank records, that between July of 2 and April of 2013, Stellar Point paid just er \$200,000 to Crystal Commercial Group Inc.? you tell me what Crystal Commercial Group Inc. , or is? A. I have no idea. Q. So, similarly, you have no mation as to why those payments may have been e, or what services they may have provided to ar Point? A. No, I do not. Q. And furthermore, Michael Spalding is poiated with Crystal Company. Does that name
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1	 Page 227 S.R. Schlacht - 411 2265. Q. We have received evidence from other individuals we have spoken with A. Yes? 2266. Qthat cars were given as gifts to certain individuals, and we just wanted to ask if you know whether or not these individuals either A) were given a gift or B) if they drive the type of careither if they drive either a Mercedes or a Kia. A. Okay. 2267. Q. So, the first person we were advised was given a car from Glenroy Browne. Do you know who Glenroy Brown is? A. I do know who he is, yes. 2268. Q. Okay. Do you know if he was given a car by Stellar Point or Dixit Holdings? A. I have no idea. 2269. Q. Do you know what kind of car he drives? A. I have no idea. I haven't seen him in ages. 2271. Q. Okay. A. Yes, I have no idea. 	J	 S.R. Schlacht - 413 2280. Q. Do you know who would know where that car would be? A. You could ask Raj. 2281. Q. And to your knowledge, is the Mercedes in the name of Stellar Point or Dixit Holdings? A. I have no idea. 2282. Q. And Ross advised that Mr. Dixit's brother was given a car? A. I have no idea. 2283. Q. Do you know what kind of car he drives? A. I knowI have no idea. He was in B.C. I have no idea. 2284. Q. So, you don't know whether or not he drives a Mercedes or a Kia? A. I am pretty sure he drives a minivan. 2285. Q. You don't know the A. Well 2286. Qbrand of Mercedes? A. Mercedes don't make a minivan, and I don't think it is the Kia. 2287. Q. Okay. A. Yes.

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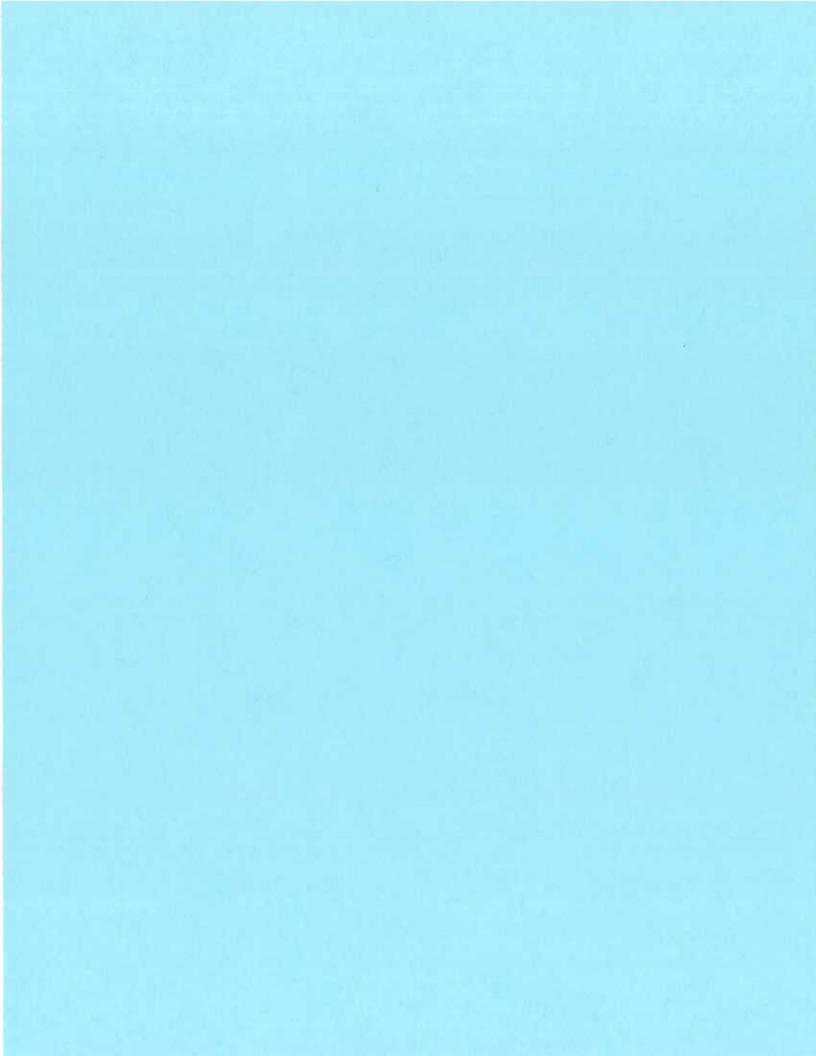
	Sheet 59 Page 230		Page 232 _			564
1	S.R. Schlacht - 414 2288. MS. CRADDOCK: Off the record.		rage 252 <u>—</u>		S.R. Schlacht - 416	
23	DISCUSSION OFF THE RECORD	1	IND	EX OF UNDERTAK	(INGS	
4 5 6 7 8 9 10 111 12 13 14 15 16 17 18 19 20 21 22	 2289. Q. So, Stephanie, have you spoken with Maxwell Morgan recently? A. He goes to our church. 2290. Q. Okay. So, I take it you have spoken with him recently? A. Yes. 2291. Q. When was the last time you spoke with Mr. Morgan? A. I saw him at the school dropping off Subway for his kids, but I don't speak any business with him. 2292. Q. Okay. A. I just know him from church. So, just a family friend. 2293. Q. And, so, you didn't discuss thedid you discuss his examination with him? A. No. 	2 3 4 5 6 7 8 9 10	REFERENCE 1 2	PAGE NUMBER 366 406	QUESTION NUMBER 2243	
23 24 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	2294. MR. WARD: Thank you. Those are my questions. Page 231 S.R. Schlacht - 415 INDEX OF EXHIBITS EXHIBIT DESCRIPTION PAGE NUMBER DESCRIPTION NUMBER B Binder of banking documents (26 tabs) 350	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30	Plea advisen their gui necessa Reportir Reportir I her transcri 11th DA	TER'S NOTE: ase be advised that tents and refusals idance only, and do rily accurate and a ng Services Inc. reby certify the fore ption of the above- Y OF JUNE, 2015, a erstanding.	S.R. Sch s.R. Sch sare provided as a service to al o not purport to be legally bind are not binding upon Victory V egoing to be a true and accu noted proceedings held before and taken to the best of my ski fied Correct:	l c di erba e me

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Court File No. CV-14-10663-00CL

ONTARIO SUPERIOR COURT OF JUSTICE (Commercial List)

AB/ak

IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1992, c. 27, s.2, AS AMENDED

AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE ISLE OF MAN WITH RESPECT TO BANNERS BROKER INTERNATIONAL LIMITED

APPLICATION OF MILES ANDREW BENHAM AND PAUL ROBERT APPLETON, IN THEIR CAPACITY AS JOINT LIQUIDATORS OF BANNERS BROKER INTERNATIONAL LIMITED, UNDER PART XIII OF THE BANKRUPTCY AND INSOLVENCY ACT (CROSS-BORDER INSOLVENCIES)

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This is the Examination of MAXWELL MORGAN, produced and examined pursuant to Section 163 of the Bankruptcy and Insolvency Act, taken at the offices of VICTORY VERBATIM REPORTING SERVICES INC., Suite 900, Ernst & Young Tower, 222 Bay Street, Toronto, Ontario, on the 13th day of April, 2015.

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Sheet 2 Page 2	Page 4
APPEARANCES: DAVID WARD for the Receiver LARRY ELLIS ERIN CRADDOCK CHRISTOPHER HORKINS HOWARD C. COHEN for Maxwell Morgan Also Present: Gillian Goldblatt Philip H. Gennis	M. Morgan - 4 MAXWELL MORGAN, affirmed EXAMINATION BY MR. WARD: 1. Q. So good morning, Max. 4. A. Good morning. 5. Q. My name is David Ward, and I'm 6. counsel for the Receiver of a company called Banners 7. Broker International Limited. 8. A. Okay. 9. Q. And, we are also the lawyers for the 10. investigatory Receiver of several other companies. 11. A. M'hmm. 12. 4. Q. And I'm just going to give you the 13. names now. 14. A. Sure. 15. Q. So that you have them in your mind, 16. and you realize why we're going to be asking about 17. companies that go beyond 18. A. Okay. 19. 6. QBanners Broker. So the other 20. companies that that we need towe have a mandate 21. to investigate are Local Management Services 22. A. Okay. 23. 7. Qwhich is 2087360 Ontario 24. Okay.
Page 3	Page 5
M. Morgan - 3 INDEX OF PROCEEDINGS PAGE NUMBER	M. Morgan - 5 1 8. Q2341620 Ontario Corporation. 2 A. M'hmm. Okay. 3 9. Q. Another company called Stellar Point 4 Inc 5 A. M'hmm. 6 10. Qformally known as Banners Broker 7 Limited. Dixit Holdings Inc., and then finally any 8 other entity that has operated under the names 9 Banners Broker, Banners Broker Limited, Banners 10 Mobile or Banners Broker Belize. So, those are the
MAXWELL MORGAN, affirmedExamination by Mr. Ward4 - 120Examination by Ms. Goldblatt121 - 159Index of Exhibits160Index of Undertakings161	11companies that we're interested in today. All12right, and again, what it is, it's just an13investigatory. Most of it is an investigatory14Receivership, so we haven't sued anybody15A. Sure.1611.17proceeding18A. Okay.1912.12.Qit's really just here to get
Certificate 163	 information that can help the Receiver do their job. A. Okay. 13. Q. Banners Broker is alleged to have been a ponzi scheme. A. Okay. A. Okay. 14. Q. And some of the money flows, as best

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	Shee	t 3 Page 6 M. Morgan - 6		. raye	8 M. Morgan - 8
1		that we can determine, have been huge. Like we're	1		A. No, I dropped out.
2		talking hundreds, tens of millions. Over 200	23	24.	
3		million, 100 million of which is missing.		05	A. Briefly, yes.
4	45	A. Okay.	4	25.	
5	15.		5		you studied at Mohawk College in media
67		trying to do is just understand the money flows relating to Banners Broker and these entities. And	6		communications, prior to that? A. Yes.
8		it seems, from what we can tell, that that Aramor	8	26.	
9		was a fairly important service provider	9	20.	Mohawk College?
10		A. M'hmm.	10		A. I did.
11	16.		11	27.	
12		wanted to do today is just to understand, from	12		next tab, if you would please, tab two. Again, it's
13		yourself, what the nature of your dealings with	13		a public search document
14		these companies were	14	00	A. M'hmm.
15 16	17.	A. Sure. Qand how the money flowed. And	15	28.	QAramor Payments, is that your business address? First Canadian Place? Right at
17	17.	how we can, you know, retroactively document some of	17		the top-left?
18		that, and what records exist.	18		A. Loosely. I mean, we use it to
19		A. Okay.	19		receive our legal documents, et cetera, but you
20	18.	Q. And we can get the Receiver to the	20		know, most of our work is done off-shore. So, we
21		point where they can take a look at them.	21		contracted several different workers, et cetera,
22	10	A. Sure.	22	00	that do all of our back office stuff.
23 24	19.	Q. So. The firstwhy don't we just have a look at some of the documents in the main	23 24	29.	
25		binder that I've put in front of Howard. And	25		A. It's a sub-lease. Intelligent Office owns it, and we simplythat's our business
	Page	7		Page	9
+		M. Morgan - 7	4		M. Morgan - 9
		there's some preliminary documentsit's not that one, it's actually the one that's open in front of	2	30.	address, legally and with CRA.
23		you.	3	50.	Q. So is that fair to say that's your registered head office?
4		A. This is mine.	4		A. Yes, that's fair to say.
56	20.	Q. Yes, and if you couldI'm sorry I	5	31.	Qin Canada
6		just have the one copy for you guys, if you're able	6		Asure.
7		to share that one.	7	32.	Q. Okay. And do you have any other
8 9		MR. COHEN: Yes, that's fine.	8		offices in Canada?
10	RV I	MR. WARD:	9	33.	A. No. Q. And do you also operate from 5700,
11	21.	Q. And a lot of these documents I	11	00.	suite 5700,100 King Street West?
12		suspect you'll have seen before, but there's an	12		A. Operate in terms of having staff
13		index, and you're welcome to take a copy of that.	13		there working?
14		Butplease have a look at tab one. I justthe	14	34.	Q. Yes.
15		information that we've got from this, and it's a	15	05	A. No.
16 17		public records search, is that Max, you, have been	16 17	35.	Q. So it's purely just a registered office?
18		the CEO of a company called Aramor Payments, since 2003?	18		A. Correct.
19		A. M'hmm.	19	36.	Q. And that is a law firm, or is it
20	22.	Q. Is that correct?	20		a
21		A. Yes.	21		A. No, it's similar to Regus. I don't
22	23.	Q. And then there's a reference to your	22		know if you're familiar with Regus, where they own
23		educational background, just below that. And am I	23		various office spaces, or lease various office
24		correct that you have a B.A. in communications from	24 25		spaces around the world, around the city, and then
25		York University?	20		they sub-lease it to other companies that want to

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		M. Morgan - 10			M. Morgan - 12
1		use it as registered addresses. If we wanted	1		A. That's correct.
2		physical office space there to work from, we could,	2	46.	Q. And then, moving on to tab five,
3		but that hasn't been the case.	$\left \frac{1}{3} \right $		it's just a business name search.
	07				
4	37.		4		A. M'hmm.
5		A. If we need a board room, or	5	47.	Q. And, these are the business names
6		something like that, for the day, we could also do	6		throughout which Banners Broker operated?
		that.			A. Five.
	00			40	
8	38.		8	48.	
9		taband we'll go through these initial few tabs	9		can just confirm for me that you've operated as
10		quickly. But in tab three, then please. Is this	10		Aramoras business names Aramor Processing, Aramor
11		ais this your company's website?			Payments, and then finally just Aramor?
					A Vas thete securets
12		A. It is, we're no longer offering some	12		A. Yes, that's accurate.
13		of the services there. Actually, you know what,	13	49.	Q. And your current business name is
14		that's fairly accurate. That's most recent.	14		just Aramor?
15	39.		15		A. Yes.
16	00.		16	E٥	
	4.0	A. This is current, yes.		50.	
17	40.		17		please, tab five. There's an address for yourself
18		services that are described on the website?	18		on pageit's three pages in to the taband it
19		A. We're an independent sales	19		indicates that you are director of Aramor?
20					A Voe thet's ecourate
20		organization. We don't provide any of the services	20	- 4	A. Yes, that's accurate.
21		individually. We sell those services. We have	21	51.	
22		agreements and contracts with several companies,	22		address of 705 Spadina Road, suite 108?
23		payment processors, banks, and service providers	23		A. I don't know where that address
24		that provide the services listed there. We're	24		comes from, but it's possible when the corporation
25		simply a sales agent.	25		was registered, that was the address initially used.
120		Simply a sales agent.	120		was registered, that was the address initially used.
·			<u></u>		
	Page	11		Page	13
	Page			Page	13
	-	11 M. Morgan - 11	1	Page	13 M. Morgan - 13
1	Page 41.	M. Morgan - 11 Q. Okay, and we're going to get into	1	Page	¹³ M. Morgan - 13 The corporation was registered in 2003. It was not
1 2	-	M. Morgan - 11 Q. Okay, and we're going to get into this into a little more detail	1 2	Page	¹³ M. Morgan - 13 The corporation was registered in 2003. It was not active until 2006, so it was simplyit was formed,
1 2 3	41.	M. Morgan - 11 Q. Okay, and we're going to get into this into a little more detail A. Sure.	1	Page	¹³ M. Morgan - 13 The corporation was registered in 2003. It was not active until 2006, so it was simplyit was formed, and at that time I was doing some research and
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 41. 42. 43. 43. 44. 45. 	M. Morgan - 11 Q. Okay, and we're going to get into this into a little more detail A. Sure. Qin relation to Banners Broker. A. Absolutely. Q. But, were you a payment processor broker? Is that a fair way to describe it? A. No, we're an independent sales organization. That's what we do, and we'rewe did offer some services to Banners Broker that may have indicated we were a payment processor. It was sort of in-lieu them not having certain services, that we were able to offer it on a temporary basis, until we could help source it for them, while maintaining some of their other business that we did send out elsewhere. So, but that's not typically our service that we provide. We are a sales organization. Q. Okay, so again, we'll return to this in a little more detail A. Sure. Qin relation to Banners, but I take it that, as an independent sales organization, you deal in credit card payment, processing, card	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	52. 53. 54. 55. 56.	M. Morgan - 13 The corporation was registered in 2003. It was not active until 2006, so it was simplyit was formed, and at that time I was doing some research and creating the business, but there was no business transacted until 2006. Q. Okay. A. So, the first three years, it was a zero dollar tax returns. And I might have been living at that address when I registered the business, but we didn't have an office. So I'm not certain where you would get that address from, but it's possible that it becameit was the first address used on the corporation Q. Yes. The only reason I'm asking is becauseyou're right, that address doesn't exist. A. Okay. Q. And so I was wondering if you know what it was? A. It's possible. I did live on Spadina road, at one point, many, many years ago. Q. Okay. A. So it's possible that that could have been it.

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	She	et 5 Page 14	ר ר	Page	
		M. Morgan - 14			M. Morgan - 16
		A. I still am, yes.			Broker
2	57		23		A. Okay.
3		A. I do not use that term, but sure. I		64.	
4		just list myself as director.	4		existence. And just to give you the timeline there.
5		MR. COHEN: Were you saying doesn't	5		Banners started operating in late 2010.
6		exist, 705 Spadina Road, suite 108, Toronto	6		A. Okay.
7		Ontario.	7	65.	
8	58	MR. WARD: Yes. We just couldn'twe	8		concluded its operation when it was wound down, when
9		searched it and we couldn't find an address	9		it was put into liquidation infirst of allin
10		for it.	10		the Isle of Man, but laterally in Canada. And that
11			11		was August of 2014.
12	B١	(MR. WARD:	12		A. Okay.
13	59	. Q. Max, what is your current address?	13	66.	
14		A. Its 583 Fleetwood Drive, in Oshawa.	14		A. Right.
15		L1K 2V7.	15	67.	Qthat I'm interested in.
16	60	. Q. And then, just tab six then. This	116		A. Sure.
17		is also a public record search. Can youdoes this	17	68.	Q. And so, to the extent that Aramor
18		company, Royal Cash Card have anything to do with	18		did things before you had any contact with Banners
19		Aramor?	19		Broker, I'm not going to go there. We don't have
20		A. No. You know we've had several	20		the time, and I'm not interested in that.
21		different card companies, globally, to work with.	21		A. Sure, okay.
22		And then we also have relationships with several	22	69.	Q. But while Aramor was dealing with
23		different resellers, or what we consider agents. So	23	001	Banners Broker
24		most of our marketing is done through various agents	24		A. M'hmm.
25		globally, that resell our services to the high-risk	25	70.	Qin addition to yourself, there's
<u> </u>	Page		·		17
	9 -	M. Morgan - 15		Lage	M. Morgan - 17
1		space, e-commerce merchants. And often times they	1		
2		opadoj o commored merenanter vina enten unice unej			
3		get licensed to use our name on their websites or	2		a number of other names that have come up.
1.1		get licensed to use our name on their websites, or	23	71	A. Okay.
		in conjunction with their product. So there may be	3	71.	A. Okay. Q. And, so I'm just going to go through
4		in conjunction with their product. So there may be sites out there that I'm unaware of.	3 4	71.	A. Okay. Q. And, so I'm just going to go through these names, and if you could tell me who these
45		in conjunction with their product. So there may be sites out there that I'm unaware of. If we see anyone using it erroneously, or	3 4 5	71.	A. Okay. Q. And, so I'm just going to go through these names, and if you could tell me who these people were?
4 5 6		in conjunction with their product. So there may be sites out there that I'm unaware of. If we see anyone using it erroneously, or without our permissionwe do own the trademark, we	3 4		A. Okay. Q. And, so I'm just going to go through these names, and if you could tell me who these people were? A. Sure.
4 5 6 7		in conjunction with their product. So there may be sites out there that I'm unaware of. If we see anyone using it erroneously, or without our permissionwe do own the trademark, we will go after them, because in the high-risk area,	3 4 5 6 7	71. 72.	A. Okay. Q. And, so I'm just going to go through these names, and if you could tell me who these people were? A. Sure. Q. And what theirthe title or their
4 5 6 7 8		in conjunction with their product. So there may be sites out there that I'm unaware of. If we see anyone using it erroneously, or without our permissionwe do own the trademark, we will go after them, because in the high-risk area, our name does carry some weight. So, I'm not	3 4 5 6 7 8		 A. Okay. Q. And, so I'm just going to go through these names, and if you could tell me who these people were? A. Sure. Q. And what theirthe title or their responsibilities were?
4 5 6 7 8 9		in conjunction with their product. So there may be sites out there that I'm unaware of. If we see anyone using it erroneously, or without our permissionwe do own the trademark, we will go after them, because in the high-risk area, our name does carry some weight. So, I'm not familiar with this, but I'm not surprised, and it	3 4 5 6 7 8 9	72.	 A. Okay. Q. And, so I'm just going to go through these names, and if you could tell me who these people were? A. Sure. Q. And what theirthe title or their responsibilities were? A. Okay.
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1		M. Morgan - 18			M. Morgan - 20
1	77.		1		to Banners?
2	,,,	L-Y-N-D-O-N B-U-R-R-E-L-L?	2		A. I would sayin relation to
3		A. Yes.	23		Banners, late, or maybe early 2012, or late 2011,
	78.	Q. Okay, and just tell me who he was,	4		actually, until their credit card processing ceased
4	10.	and what his reasonabilities were?	5		whenever that date was. I would imagine maybe late
5		and what his responsibilities were?			
6		A. He was an independent sales	6		2012. I don't have the exact dates in front of me.
		contractor that was retained by Aramor. He's a			That was his role, was to maintain those accounts,
8		personal friend as well. He simply sold our payment	8		specifically to their credit card processing and
9		services, of our partners, to various	9		some alternative processing that they had with
10		merchantshigh-risk merchants. His contact with	10		UseMyServices. Any of our third-party arrangements.
11		Bannershe sold them our credit card products. So	11	84.	
12		whatever credit card processing they had, he engaged	12		that one-year period of 2011 until late 2012?
13		in getting them set up. Helping set the rates, et	13		A. As far as I recall, yes.
14		cetera, and that's what he sold to them. He sold	14	85.	
15		them a service that we didn't offer, our partners	15		mentioned, Banners continued on into
16		offered, which is why I haven't included him in any	16		A. They did.
17		of this, because it's pretty standard what he did.	17	86.	Qlate 2014?
18		And there's no secret behind it.	18		A. But our rule, once we set them up
19	79.	Q. So I take itwas he an Aramor	19		with certain accounts, is to just collect our
20		employee, or was he on	20		commission on it. We don't necessarily have to
21		A. I have no Aramor employees.	21		communicate with them after that. So, if we set up
22		Everyone is independently contracted. Aramor being	22		someone, and they begin processing now, five years
23		the legal name, and trademarked and representing a	23		from now, we can still collect on it. It's
24		brand. And they can cover behind that banner in a	24		notour relationship is now with the bank or
25		case like this. I don't mind taking the	25		payment processor. They give us our money. We no
	Page	19		Page	
		M. Morgan - 19			
		in norgan to			M. Morgan - 21
1			1		longer have to maintain the accounts, unless needed.
1 2		responsibility for whatever the actions are. And,	1	87.	longer have to maintain the accounts, unless needed.
1 2 3		responsibility for whatever the actions are. And, so he was independently contracted. He sold certain	1 2 3	87.	longer have to maintain the accounts, unless needed.
3		responsibility for whatever the actions are. And, so he was independently contracted. He sold certain products. The products were pretty straightforward.		87. 88.	longer have to maintain the accounts, unless needed. Q. At Aramor A. Yes.
3		responsibility for whatever the actions are. And, so he was independently contracted. He sold certain products. The products were pretty straightforward. There's contracts and agreements that Banners had	3		Ionger have to maintain the accounts, unless needed. Q. At Aramor A. Yes. Qit's between yourself and Lyndon,
345		responsibility for whatever the actions are. And, so he was independently contracted. He sold certain products. The products were pretty straightforward. There's contracts and agreements that Banners had with those providers and banks and service	3 4 5		Ionger have to maintain the accounts, unless needed. Q. At Aramor A. Yes. Qit's between yourself and Lyndon, because there's a couple of other names here
3 4 5 6		responsibility for whatever the actions are. And, so he was independently contracted. He sold certain products. The products were pretty straightforward. There's contracts and agreements that Banners had with those providers and banks and service providers. I'm not really sure what else you want	3 4		longer have to maintain the accounts, unless needed. Q. At Aramor A. Yes. Qit's between yourself and Lyndon, because there's a couple of other names here that
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	81. 82.	responsibility for whatever the actions are. And, so he was independently contracted. He sold certain products. The products were pretty straightforward. There's contracts and agreements that Banners had with those providers and banks and service providers. I'm not really sure what else you want me to add. Q. Okay, that's fine. I meandid he have a title or anything, within Aramor, that he could when he was marketing your services? A. He could useI allow people to use whatever titles they want. Titles aren't very important in my industry. Q. And lastly, when you say that he had a contract withyou said he was an independent sales contractordid he have a written agreement with A. No. Qwith Aramor of any kind? A. No. Handshake agreement. Whatever commissions came in that were his, he got paid honestly, and regularly. And I do have several agreements like that.	3 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 20 21 22 23	88.89.90.91.92.	longer have to maintain the accounts, unless needed. Q. At Aramor A. Yes. Qit's between yourself and Lyndon, because there's a couple of other names here that A. Sure. Qwe'll look at it, but I understand that it was yourself and Lyndon, that perhaps had the most contact with A. Yes QAramor Athe accounts he set up with them were fairly large, so it did take some management. Q. And was he the Banners relationship person within Aramor? A. Not necessarily. He wasit was primarily myself. He was the representative when it came to specific products. Q. I take it he reported to yourself? A. He did. Q. So that you were the primary Aramor contact for Banners?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22	81.	responsibility for whatever the actions are. And, so he was independently contracted. He sold certain products. The products were pretty straightforward. There's contracts and agreements that Banners had with those providers and banks and service providers. I'm not really sure what else you want me to add. Q. Okay, that's fine. I meandid he have a title or anything, within Aramor, that he could when he was marketing your services? A. He could useI allow people to use whatever titles they want. Titles aren't very important in my industry. Q. And lastly, when you say that he had a contract withyou said he was an independent sales contractordid he have a written agreement with A. No. Qwith Aramor of any kind? A. No. Handshake agreement. Whatever commissions came in that were his, he got paid honestly, and regularly. And I do have several	3 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 11 23 14 11 23 14 11 23 14 11 23 14 11 23 12 21 22 12 21 22 12 21 22 12 21 22 12 21 22 12 21 22 12 21 22 12 21 22 12 21 22 12 21 22 12 21 22 12 21 22 12 21 22 12 21 2 21 22 1 2 21 2 21 22 1 22 1 22 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	88.89.90.91.92.	longer have to maintain the accounts, unless needed. Q. At Aramor A. Yes. Qit's between yourself and Lyndon, because there's a couple of other names here that A. Sure. Qwe'll look at it, but I understand that it was yourself and Lyndon, that perhaps had the most contact with A. Yes QAramor Athe accounts he set up with them were fairly large, so it did take some management. Q. And was he the Banners relationship person within Aramor? A. Not necessarily. He wasit was primarily myself. He was the representative when it came to specific products. Q. I take it he reported to yourself? A. He did. Q. So that you were the primary Aramor

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	Sheet	t 7 Page 22		Page	24
	bilee	M. Morgan - 22		2 0 9 0	M. Morgan - 24
1		A. Yes.	1		A. Working with Banners?
2	95.	Q. What was her function and relation	23	106.	
23		to Banners?	3		Banners?
4		A. She's our payments manager. She's	4		A. Probablywell2011 to end of
5		also independently contracted. Her relationship to	5		2012, she probably left mid-2013.
6		Banners wasshe just simply authorized the	6	107.	
7		movement of funds. So, really, it's largely an	7		A. Alicia Varga helps with operations,
8		administrative role. In lieu of my day-to-day	8		also independently contracted. As far as her role
9 10		activities, I couldn't always be there to administer	10		with Banners, I don't think she did anything with
11		certain things. So I have a team in the Philippines that does a lot of the back office work, and she	111		Banners. If there's any communication it's just incidental. Maybe she was copied on an email or
12		administers most of that.	12		something, I don't know. But she had no relation to
13	96.		13		Banners Broker.
14		movement of funds"?	14	108.	
15		A. Well I authorize the movement, but	15		haven't mentioned that were your contractors that
16		she enacts itshe puts it into action.	16		worked with Banners?
17	97.	Q. Okay.	17		A. No.
18		A. So she canyou knowshe's good	18	109.	
19		with banking, she's good with numbers. She's	19		offices, you mentioned the Canadian office?
20		basically there to help with the reporting elements	20		A. Sure.
21		of sending files back and forth, and ensuring if	21	110.	
22		there's something to follow up on, she would do it.	22		Philippines as well?
23 24		If there's an enquiry at the bank, she would do it.	23 24		A. I have five staff in the
24		So she had a largely administrative role in that sense.	24		Philippines. They work independently. There's no office there.
	Page			Page 2	
	raye				
		M. Morgan - 23		raye .	
1	98.	M. Morgan - 23 Q. And was she the person that dealt	1		M. Morgan - 25
1	98.	Q. And was she the person that dealt	1	111.	M. Morgan - 25 Q. Okay.
23	98.	Q. And was she the person that dealt primarily with financial institution interactions?	1 2 3	111.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group.
23	98. 99.	 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? 	1 2 3 4	111. 112.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation
2		 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? A. She is still with me, but she's not 	1 2 3	111. 112.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation to Banners?
2 3 4 5 6	99.	 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? A. She is still with me, but she's not an employee. 	1 2 3 4 5 6	111. 112.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation to Banners? A. No.
2 3 4 5 6 7		 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? A. She is still with me, but she's not an employee. Q. No, I understand. I understand. 	1 2 3 4 5 6 7	111. 112. 113.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation to Banners? A. No. Q. No. So the staff in the Philippines
2 3 4 5 6 7 8	99.	 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? A. She is still with me, but she's not an employee. Q. No, I understand. I understand. When did she start, if you recall? 	1 2 3 4 5 6 7 8	111. 112. 113.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation to Banners? A. No. Q. No. So the staff in the Philippines never had anything to do with Banners?
2 3 4 5 6 7 8 9	99. 100.	 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? A. She is still with me, but she's not an employee. Q. No, I understand. I understand. When did she start, if you recall? A. 2006. 	1 2 3 4 5 6 7 8 9	111. 112. 113.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation to Banners? A. No. Q. No. So the staff in the Philippines never had anything to do with Banners? A. Liza, the name Liza that you have
2 3 4 5 6 7 8 9 10	99.	 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? A. She is still with me, but she's not an employee. Q. No, I understand. I understand. When did she start, if you recall? A. 2006. Q. Okay. 	1 2 3 4 5 6 7 8 9 10	111. 112. 113.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation to Banners? A. No. Q. No. So the staff in the Philippines never had anything to do with Banners? A. Liza, the name Liza that you have there.
2 3 4 5 6 7 8 9 10 11	99. 100. 101.	 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? A. She is still with me, but she's not an employee. Q. No, I understand. I understand. When did she start, if you recall? A. 2006. Q. Okay. A. 2005, actually. 	1 2 3 4 5 6 7 8 9 10 11	111. 112. 113.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation to Banners? A. No. Q. No. So the staff in the Philippines never had anything to do with Banners? A. Liza, the name Liza that you have there. Q. Right.
2 3 4 5 6 7 8 9 10 11 12	99. 100.	 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? A. She is still with me, but she's not an employee. Q. No, I understand. I understand. When did she start, if you recall? A. 2006. Q. Okay. A. 2005, actually. Q. And then Liza Abrigana? 	1 2 3 4 5 6 7 8 9 10 11 12	111. 112. 113. 113.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation to Banners? A. No. Q. No. So the staff in the Philippines never had anything to do with Banners? A. Liza, the name Liza that you have there. Q. Right. A. She assisted Tricia with whatever
2 3 4 5 6 7 8 9 10 11 12 13 14	99. 100. 101. 102.	 Q. And was she the person that dealt primarily with financial institution interactions? A. Yes, primarily. Q. And again, what was her tenure? A. She is still with me, but she's not an employee. Q. No, I understand. I understand. When did she start, if you recall? A. 2006. Q. Okay. A. 2005, actually. Q. And then Liza Abrigana? A. She's in the Philippines. She works 	1 2 3 4 5 6 7 8 9 10 11 12 13 14	111. 112. 113. 113. 114.	M. Morgan - 25 Q. Okay. A. We communicate with them mainly by Skype or BBM group. Q. And do they do some work in relation to Banners? A. No. Q. No. So the staff in the Philippines never had anything to do with Banners? A. Liza, the name Liza that you have there. Q. Right.
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Sheet 8 Page 26	- 572
M. Morgan - 26 first contact that your company had with Banners? And when I say Banners, I'm going to include Stellar Point. A. Sure. 118. Q. And I'm also going to include the three primary principals of Banners, which are Chris Smith A. M'hmm. 119. QRajiv Dixit A. Okay. 1120. Qand Kuldip Josun A. Sure. 121. Qand I guess what I want to know from you, is when was the first time that you had a point of contact with one of those A. The first time was with Rajiv Dixit. That would belike to say, end of summer in 2011. 122. Q. Okay, and tell me about that? A. Well, RajivI know Rajiv fromwe attend the same church. I invited him over for lunch with his family, at the time. And it wasn't regarding business. It washis wife was new and didn't seem to know a lot of people, so I said to my wife, "we should invite them over," she looked kind of sad. Our kidswe have a child that's one-year	M. Morgan - 28 point, it evolved into a business relationship? A. Yes. 128. Q. He said, "I have something for you" and then he contacted me and he asked me to meet with Chris and himself and Kuldip. I want to say that was probably in October, maybe, of 2011. It was in the last quarter. They told me what their business was. What the model was. And they told me it had to deal with marketing, and search engine optimization with an MLM component to it. It sounded legitimate and clean. They asked for credit card processing, initially. They told me their international scope, and which countries they're focusing on. They asked if I could get them credit card processing. I said yes. Lyndon was with me at the time, with the company, and heI tasked himwe already had relationships in place where we could get them credit card processing. So really, the rest was for Lyndon to negotiate rates and get the technical jargon taken care of. 129. Q. So the business component of the relationship started around that time? A. Yes. 130. Q. Last quarter of 2011? A. That's correct.
Page 27 M. Morgan - 27 1 older than their kids, at the time. And so I said 2 they could play together. So they came over, we had 3 a barbecue, and Rajiv asked what I did. And I told 4 him. And he said, "hey, we could use your services, 5 I might have something for you." And I said, "all 6 right. So you have my number you can call me when 7 you're ready." And that was it. So that was maybe 8 August of 2011, somewhere in that ball park. 9 123. Q. 124. Q. And, Raj actually had a wife who was 125. Q. It wasn't was summer. 11 124. Q. 125. Q. It wasn't stephanie? 14 A. No, no, no 15 125. Q. 16 A. At the timehe wasn't married 17 legally at the time. But it was another girl named 18 Jennifer. He wasn't married to her, but he has kids 19 with her, and I think they werethey had a 20 spiritual union, so they say. And StephanieI 21 meanshe was his as	Page 29 M. Morgan - 29 1 131. Q. And when did it end? 2 A. Cease? 3 132. Q. Yes. 4 A. Iwant to sayI mean we got 5 commissions from them right up until end of 2013. 6 Sobut in terms of communication with Banners, I 7 would probably say maybe early 2013, mid-2013, I 8 can't say for certain. 9 133. Q. Okay. 10 A. But somewhere in that ballpark. 11 134. Q. Was it around the time that Banners 12 started to have problems with 13 A. Yes, although we didn't go and end 14 the relationship because of that. They just had 15 problems and weren't really using our services in 16 the same way. A lot of our providers pulled back. 17 135. Q. Right. 18 A. And so things sort of tapered off 19 from there, but 20 20 136. Q. Okay. 21 Athey were operational, as far as 22 I know, up until, probably late last yea

			- 57
	Sheet 9 Page 30		_ Page 32
	M. Morgan - 30		M. Morgan - 32
1	or 2014, that	1	to allow for us to find a better solution for them,
2	A. Our relationship ended in 2013, but	1 2	
2		23	with the understanding that they had a very wei-full
3	Iwhat I was mentioning is that I think they were		
4	operational until late 2014.	4	we had started processing credit cards for them
5	139. Q. And did you continue to receive	5	through our partner, and we saw a very good
6		6	
0	commissions from them, at some point after the		
7	relationship ended?		Usually we can tell very early if it's
8 9	A. Not from them directly.	8	going to be a good client or not. And then lastly,
9	140. Q. Right.	9	we did payouts for them. So the payouts we did,
10	A. After the relationship ended, yes.	10	were towe pay out directly to credit cards
11	We got commissions from a company called Allied	11	through our card funds transfer service. We offer
12	Wallet	12	prepaid cards through our prepaid card vendor. And
12 13	141. Q. Right.	13	we would also initiate EFT payments on our own, and
14	Athat processes their credit card	14	
15	transactions. They're fairly large, and we have a	15	
16	good relationship with them. So those commissions	16	
17	didn't stop.	17	direct deposit within Canada.
18	142. Q. Now I'm going to talk about	18	
19	commissions as a separate topic, because it's of	19	
20	interest to us.	20	limited amount of that, not a lot. We offered ACH
21	A. Sure.	21	payouts through our partner in the US. And we
22	143. Q. But, I think what would probably	22	offered wires, from time to time, through our own
<u> </u>		00	onereu wires, nom une to une, through our own
23	make sense now, for everyone in the room, and	23	
24	particularly for the Receiver, is why don't you just	24	148. Q. And when you say offered wires, are
25	take a minute, if you could, and tell us in your own	25	we talking about wires
_		2	. Page 33
	M. Morgan - 31	4	M. Morgan - 33
1	words howwhat services you provided to Aramor and	1	A. Incoming wires, but also outgoing
2	that it did	2	wires, as far as payouts
3	A. To Banners Broker, you mean?	23	149. Q. Okay.
	144. Qto Banners Broker, I'm sorry.	4	A to facilitate any of their
4			
5	And then how that evolved over time, if it did, up	5	billables, or payroll obligations, commissions.
6	until the time that it ended	6	
7	A. Sure.		150. Q. So did you have an exclusive on
		7	
		7	payouts? Do you know?
8	145. Qin 2013?	8	payouts? Do you know? A. No we didn't, but we could have. I
8 9	145. Qin 2013? A. Okay, so they needed a way to accept	8 9	payouts? Do you know? A. No we didn't, but we could have. I think theymost companies want to be redundant in
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	Chest 10 Dags 24	Page 36	
	Sheet 10 Page 34 M. Morgan - 34	M. Morgan - 36	
4			
	that something that you did yourself, or was that	would prefer. I'm happy to take an undertaking.	
2	something that you	2 A. I can give it to you now. It's	
3	A. No, we have	3 not	
4	155. Qhad a service provider?	4 170. Q. Sure.	
5	Awe have a service provider that	Aa big deal.	
		MD COLIEN. If we can't access it have	
6	does that.	MR. COHEN: If we can't access it here,	
7	156. Q. And which was that service provider?	7 you can write me for it.	
8	A. They're called NX Systems Limited.	8 171. MR. WARD: Sure.	
9	N-X Systems Limited. They're in Oregon, and they're	9 MR. COHEN: And I'll determine whether	
10	also in Ireland. And have a banking license in the	10 or not it's available. Because I don't	
11	UK.		
12	157. Q. Okay, so they did the credit	12 can't provide.	
13	cardthe payouts directly to affiliates credit	13 172. MR. WARD: Sure. Well to say	
14	cards?	14 MR. COHEN: I'm not connected to it.	
15	A. That's correct.	15 173. MR. WARD:yes.	
16	158. Q. NX Systemsdid anyone elseany	16 THE DEPONENT: It's 2319636 Ontario	
17	other companies do those?	17 Limited.	
18	A. No.	18 MR. COHEN: 231	
19	159. Q. To your knowledge, obviously?	19 THE DEPONENT: 9636 Ontario Limited.	
20	A. To mý knowledge. I don't think they	20	
21	had ever heard of it until I brought it to them.	21 BY MR. WARD:	
22	160. Q. Right.	22 174. Q. And did that company have a business	
23			
	A. It's not a common product.		
24	161. Q. And what about the prepaid credit	A. No, it was just a back office for	
25	card component? Did you do that?	25 EFT payments.	
·	Page 35	Page 37	
	M. Morgan - 35	M. Morgan - 37	
1		1 175 O Okay And were there any other	
1	A. I'm sure they had a lot of different	1 175. Q. Okay. And were there any other	
1 2	A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and	1 175. Q. Okay. And were there any other 2 companies, or entities, or persons that did EFT	
3	A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did	1175.Q.Okay. And were there any other2companies, or entities, or persons that did EFT3payments, apart from 239?	
3	A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did it through Payoneer.	1175.Q.Okay. And were there any other2companies, or entities, or persons that did EFT3payments, apart from 239?4A.No, 231.	
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3 4 5 6	 A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did it through Payoneer. 162. Q. Payoneer? A. Which is located in New York. 	1175.Q.Okay. And were there any other2companies, or entities, or persons that did EFT3payments, apart from 239?4A.No, 231.5176.Q.231, I'm sorry. And what about the6ACH payout?	
3 4 5 6 7	 A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did it through Payoneer. 162. Q. Payoneer? A. Which is located in New York. 163. Q. Okay. Anydid you do it through 	1175.Q.Okay. And were there any other2companies, or entities, or persons that did EFT3payments, apart from 239?4A.No, 231.5176.Q.231, I'm sorry. And what about the6ACH payout?7A.ACH, we used a company called Check	
3 4 5 6 7 8	 A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did it through Payoneer. 162. Q. Payoneer? A. Which is located in New York. 163. Q. Okay. Anydid you do it through any other entities, or just Payoneer? 	1175.Q.Okay. And were there any other2companies, or entities, or persons that did EFT3payments, apart from 239?4A.No, 231.5176.Q.231, I'm sorry. And what about the6ACH payout?7A.ACH, we used a company called Check8Gateway, out of the US.They're in Arizona.	
3 4 5 6 7 8 9	 A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did it through Payoneer. 162. Q. Payoneer? A. Which is located in New York. 163. Q. Okay. Anydid you do it through any other entities, or just Payoneer? A. Just Payoneer. 	1175.Q.Okay. And were there any other2companies, or entities, or persons that did EFT3payments, apart from 239?4A.No, 231.5176.Q.231, I'm sorry. And what about the6ACH payout?7A.ACH, we used a company called Check8Gateway, out of the US.They're in Arizona.9177.Q.Okay.	
3 4 5 6 7 8 9 10	 A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did it through Payoneer. 162. Q. Payoneer? A. Which is located in New York. 163. Q. Okay. Anydid you do it through any other entities, or just Payoneer? A. Just Payoneer. 164. Q. And the EFT payments to bank 	1175.Q.Okay. And were there any other2companies, or entities, or persons that did EFT3payments, apart from 239?4A.No, 231.5176.Q.231, I'm sorry. And what about the6ACH payout?7A.ACH, we used a company called Check8Gateway, out of the US. They're in Arizona.9177.Q.10A.M'hmm.	
3 4 5 6 7 8 9 10 11	 A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did it through Payoneer. 162. Q. Payoneer? A. Which is located in New York. 163. Q. Okay. Anydid you do it through any other entities, or just Payoneer? A. Just Payoneer. 	1175.Q.Okay. And were there any other2companies, or entities, or persons that did EFT3payments, apart from 239?4A.No, 231.5176.Q.231, I'm sorry. And what about the6ACH payout?7A.ACH, we used a company called Check8Gateway, out of the US. They're in Arizona.9177.Q.10A.M'hmm.	
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3 4 5 6 7 8 9 10 11 12	 A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did it through Payoneer. 162. Q. Payoneer? A. Which is located in New York. 163. Q. Okay. Anydid you do it through any other entities, or just Payoneer? A. Just Payoneer. 164. Q. And the EFT payments to bank accounts? A. EFT payments, we had a numbered 	1175.Q.Okay. And were there any other2companies, or entities, or persons that did EFT3payments, apart from 239?4A.No, 231.5176.Q.231, I'm sorry. And what about the6ACH payout?7A.ACH, we used a company called Check8Gateway, out of the US.9177.Q.0A.11178.Q.12did you	
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3 4 5 6 7 8 9 10 11 12 13 14	 A. I'm sure they had a lot of different vendors, particularly Choice Bank out of Belize and a couple other vendors here in Canada. But we did it through Payoneer. 162. Q. Payoneer? A. Which is located in New York. 163. Q. Okay. Anydid you do it through any other entities, or just Payoneer? A. Just Payoneer. 164. Q. And the EFT payments to bank accounts? A. EFT payments, we had a numbered company here that we used, separate from Aramor. I could get that to you. I don't have it on me now. 	1 175. Q. Okay. And were there any other 2 companies, or entities, or persons that did EFT 3 payments, apart from 239? 4 A. No, 231. 5 176. Q. 231, I'm sorry. And what about the 6 ACH payout? A. ACH, we used a company called Check 7 A. ACH, we used a company called Check 8 Gateway, out of the US. They're in Arizona. 9 177. Q. Okay. And then outgoing wires? 10 A. M'hmm. 11 178. Q. How were they affected? Directly or 12 did you A. We probably employed a few different 14 ideas for that. We did some out of our accounts at A	
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	Shee	t 11 Page 38		Page 40
		M. Morgan - 38		M. Morgan - 40
1		quarter of the outgoing wires were done from your	1	A. We were the intermediary on that
		CIPC appoints?	2	rolationabin. So Donnaro would give up the monoy
2		CIBC accounts?		relationship. So Banners would give us the money,
3		A. That's correct.	3	and then we wouldthey would send the wires. We
4	181		4	would send them a lump sum, and they would divide it
5		itdid you have three accounts at CIBC?	5	and send it to the individual affiliates.
6		A. We did. Four at one point in time.	6	195. Q. So you were an intermediary int he
7	182		7	sense that the money went from Banners, through your
8		A. Two US, which were the primary	8	CIBC accounts?
9		accounts used most of the time.	9	A. That's correct.
	100			
10	183		10	196. Q. And were there any otherI think
11		branch?	11	you mentioned there were, but you didn't have their
12		A. Yes, they were.	12	names for the any other service providers?
13	184		13	A. No, anyone else we used, it was
14		A. Correct.	14	direct, so they would go direct to Banners. We'd at
15	185	. Q. And you've given us some CIBC	15	least provide the introduction, but we didn't do the
16		account records?	16	contract.
17		A. Yes, I've given them all for the	117	197. Q. So the money never came across any
18		time period requested.	18	of your accounts?
19	186		19	A. No. It did not.
20	100		20	198. Q. Okay.
		have some questions aboutspecific questions about		
21		some of the accounts later on.	21	A. Yes.
22	407	A. Yes, okay.	22	199. Q. But you provided the introduction?
23	187		23	A. That's our primary business.
24		you've given us the bank records for the four CIBC	24	200. Q. So, in terms of the payouts?
25		accounts?	25	A. M'hmm.
	Page		,	Page 41
	Page]	
1	Page	M. Morgan - 39		M. Morgan - 41
1		M. Morgan - 39 A. I don't now if it is for the four.	1	M. Morgan - 41 201. Q. Have we covered all the means that
1 2	Page 188	M. Morgan - 39 A. I don't now if it is for the four. Q. Because I thought we had some	1	M. Morgan - 41 201. Q. Have we covered all the means that payouts were affected, directly to credit card,
1 2 3	188.	M. Morgan - 39 A. I don't now if it is for the four. Q. Because I thought we had some A. I think you had three.	1 2 3	M. Morgan - 41 201. Q. Have we covered all the means that payouts were affected, directly to credit card, prepaid credit cards, EFT payouts, ACH
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1 2 3 4 5 6	188.	M. Morgan - 39 A. I don't now if it is for the four. Q. Because I thought we had some A. I think you had three. Q. Right. A. The fourth one might have been miscellaneous payroll, which didn't really apply,	1 2 3 4 5 6	M. Morgan - 41 201. Q. Have we covered all the means that payouts were affected, directly to credit card, prepaid credit cards, EFT payouts, ACH A. No, they're one more, actually. There's cash payouts. In specific countries where remittance is high.
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	Sheet 12 Page 42 M. Morgan - 42		M. Morgan - 44	
1	205. Q. And what was Aramor's dealings, in	1	know, maybe three million. It's really hard to say.	
2	terms of	2	214. Q. In terms of payouts?	
3	A. Facilitating that?	3	A. In total.	
4	206. Q. Yes.	4	215. Q. Right, yes.	
5	A. Just an introduction. We introduced	5	A. But it could be less. I don't know.	
6	them to the principal there. We would help with the	6	216. Q. Okay. And for facilitatingwell	
7	back office, as far as ensuring that the records and	7	let's move on for a minute, in terms of payouts	
8	reports were suitable. And when things didn't go	8	A. It's easier for me tally things like	
9	their way, if cash wasn't on the ground in India, we	9	credit card processing, things like that, which are	
10	would intervene, and try to get more details for	10	very tangiblelike I canI have a monthly	
11	them. Banners wasn't necessarily adept at managing	11	reconciliation report that's sent to us, so I can	
12	their disbursements, so we would aid in that, as far	12	estimate ball park numbers there. And estimating	
13	as just helping them retrieve funds if funds didn't	13	that, and then looking at what the payouts are. I	
14	make it there, or if something didn't show up on	14	mean, it's easy to say that it would probably be in	
15	time. If a number was read wrong, or reports were	15	the millions, but I don't think all of it wentwe	
16	given wrong, where someone couldn't pick up money,	16	only got a fraction of it.	
17	we would intervene in that.	17	217. Q. Okay. Before we move off of payouts	
18	207. Q. So, did the money actuallythe	18	then let's talk about records	
19	money that Banners was using to fund cash payments	19	A. Sure.	
20	through E-Cash. Did that money ever go through an	20 21	218. Qthat might or might not exist, in	
21 22	Aramor account? A. No, it didn't.	22	terms of these various methods of payouts.	
23	208. Q. So you had an administrative support	23	A. Okay. 219. Q. So, starting from the top, payouts	
24	function in relation to E-Cash, though?	24	219. Q. So, starting from the top, payouts that Aramor was involved in that went directly to	
25	A. That's right. That was the	25	affiliates credit cards?	
	Page 43		Page 45	
	M. Morgan - 43		M. Morgan - 45	
1	agreement.	1	A. Yes.	
2	209. Q. Any other ways that cash payouts	2	220. Q. How was that documented, and how	
3	werethat Banners effected cash payments to	10		
		3	could the Receiverwho would we go to get those	
4	yourpayouts to your knowledge?	4	records?	
45	yourpayouts to your knowledge? A. No.	45	records? A. Well, we would have it sent to an FX	
4567	yourpayouts to your knowledge? A. No. 210. Q. Do you have a sense of thejust	4 5 6	records? A. Well, we would have it sent to an FX company, usually in the UK, often times offshore,	
67	yourpayouts to your knowledge? A. No. 210. Q. Do you have a sense of thejust the volume of the payouts that were made during	4 5 6 7	A. Well, we would have it sent to an FX company, usually in the UK, often times offshore, Malta, there is a few different jurisdictions. They	
6 7 8	yourpayouts to your knowledge? A. No. 210. Q. Do you have a sense of thejust the volume of the payouts that were made during Aramor's tenure. Just let me finish the question	4 5 6 7 8	records? A. Well, we would have it sent to an FX company, usually in the UK, often times offshore, Malta, there is a few different jurisdictions. They would remit to NX Systems, to our accounts at NX	
6 7 8 9	yourpayouts to your knowledge? A. No. 210. Q. Do you have a sense of thejust the volume of the payouts that were made during Aramor's tenure. Just let me finish the question A. In total?	4 5 6 7 8 9	A. Well, we would have it sent to an FX company, usually in the UK, often times offshore, Malta, there is a few different jurisdictions. They would remit to NX Systems, to our accounts at NX Systems. Our account loosely means any clients that	
6 7 8 9 10	yourpayouts to your knowledge? A. No. 210. Q. Do you have a sense of thejust the volume of the payouts that were made during Aramor's tenure. Just let me finish the question A. In total? 211. Qyes, but let me just put the	4 5 6 7 8 9 10	A. Well, we would have it sent to an FX company, usually in the UK, often times offshore, Malta, there is a few different jurisdictions. They would remit to NX Systems, to our accounts at NX Systems. Our account loosely means any clients that our using our accounts, using our name as a	
6 7 8 9 10 11	yourpayouts to your knowledge? A. No. 210. Q. Do you have a sense of thejust the volume of the payouts that were made during Aramor's tenure. Just let me finish the question A. In total? 211. Qyes, but let me just put the question on the record, first of all. I'm not going	4 5 6 7 8 9 10	A. Well, we would have it sent to an FX company, usually in the UK, often times offshore, Malta, there is a few different jurisdictions. They would remit to NX Systems, to our accounts at NX Systems. Our account loosely means any clients that our using our accounts, using our name as a reference. So we would get paid a commission, or a	
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 yourpayouts to your knowledge? A. No. 210. Q. Do you have a sense of thejust the volume of the payouts that were made during Aramor's tenure. Just let me finish the question A. In total? 211. Qyes, but let me just put the question on the record, first of all. I'm not going to hold you to it, but we know where millions, and millions of dollars. A. Right. 212. Q. But, do you have a sense of the total number of cash payouts that Aramor would have been across? A. Cash? 213. Q. No, just payouts of any of the means that we've discussed? A. It was very disorganized, and their numbers were huge at their height, so it's hard to 	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Records? A. Well, we would have it sent to an FX company, usually in the UK, often times offshore, Malta, there is a few different jurisdictions. They would remit to NX Systems, to our accounts at NX Systems. Our account loosely means any clients that our using our accounts, using our name as a reference. So we would get paid a commission, or a kick back. And then the funds would get sent out. It's set up that way, so that it gives the clients anonymous use of it. It's set up that way as well, because we deal with a lot of companies in grey areas. So, you know, when there's a seizure, or there's a problem, they'd have to subpoena those companies specifically. 221. Q. I mean justI don't A. You can ask 222. QI'm sure it makes sense. Obviously it worked for a while, but just explain to 	

	heet	t 13 Page 46		Page 48
		M. Morgan - 46		M. Morgan - 48
1		France a \$100 refund to his credit card?	1	231. Q. And you make it happen, then, right?
2		A. Okay, so the way it would work. So	2	A. That's correct.
3		let's say he has	3	
4	224.		4	you'll deal with NX?
5		example, and just explain to me Aramor's role in the	5	
6		piece?	6	
7		A. So, our job is to set up the	7	We deal with everything with else.
8		relationship between NX Systems and Banners Broker.	8	
9		What we would do islet's say Chris has a 1000	9	
0		pings to send and it's 250,000 in total that he	10	A. Well I meant sending the wire.
1		wants to send out to cards, what he would do is wire	11	Lyndon had nothing to do with payouts, he only had
2		the funds to one of our FX firms, we use several, so	12	
3		for example FCE Exchange in the UK, MoneyCorp,	13	
4		there's several. The funds would go from there.	14	
5		We'd have the funds sent from there, all the way to	15	
6		NX Systems.	16	
	225.	Q. So, first of all, it would go to a	17	payouts would go to
8		foreign exchange firm?	18	A. It would go to one of the accounts
9		A. That's right.	19	
	226.	Q. And you had anAramor had an	20	
1		account at the foreign exchange firm?	21	there, it would go to the individual card holders,
2		A. No, we would set up individual	22	globally.
3		accounts for our clients. Such as, Banners Broker.	23	236. Q. Okay, so just
4		They would have accounts set up there.	24	
	227.	Q. And the name of the foreign exchange	25	business, though.
	age			. Page 49
	Ĵ	M. Morgan - 47		
1				M. Morgan - 49
		firm that you gave me in your example, was?	1	237. Q. No?
2		A. FCE Exchange is one.	1 2	237. Q. No? A. Just becauseI don't think they
32	228.	A. FCE Exchange is one. Q. Okay.	1 2 3	237. Q. No? A. Just becauseI don't think they really had a full understanding of how it worked.
32 4		A. FCE Exchange is one.		237. Q. No? A. Just becauseI don't think they really had a full understanding of how it worked. Cash payments were the biggest part of their
32 4	228.	A. FCE Exchange is one. Q. Okay.	1 2 3 4 5	237. Q. No? A. Just becauseI don't think they really had a full understanding of how it worked. Cash payments were the biggest part of their
3 2 4 5	228.	 A. FCE Exchange is one. Q. Okay. A. And then, basically the funds would 	4 5	 Q. No? A. Just becauseI don't think they really had a full understanding of how it worked. Cash payments were the biggest part of their business. And wires were a big part. Cash being,
3 2 4 5	228.	 A. FCE Exchange is one. Q. Okay. A. And then, basically the funds would go to NX Systems. NX Systems would get the funds, 	4 5 6 7	237. Q. No? A. Just becauseI don't think they really had a full understanding of how it worked. Cash payments were the biggest part of their
3 2 4 5 7 8	228.	A. FCE Exchange is one. Q. Okay. A. And then, basically the funds would go to NX Systems. NX Systems would get the funds, and we would go ahead and tell them where it would go. So we would send them a file, we'd upload a file, with all the names and card numbers, et	4 5 6 7 8	 237. Q. No? A. Just becauseI don't think they really had a full understanding of how it worked. Cash payments were the biggest part of their business. And wires were a big part. Cash being, probably the largest, at one point. 238. Q. Just to close off on the payments directly to credit cards, then. Would youwhat
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$\frac{3}{2}$	228. 229.	 A. FCE Exchange is one. Q. Okay. A. And then, basically the funds would go to NX Systems. NX Systems would get the funds, and we would go ahead and tell them where it would go. So we would send them a file, we'd upload a file, with all the names and card numbers, et cetera. And that's where it would go. Q. Okay. So, how was it that you were 	4 5 6 7 8 9 10 11 12	 237. Q. No? A. Just becauseI don't think they really had a full understanding of how it worked. Cash payments were the biggest part of their business. And wires were a big part. Cash being, probably the largest, at one point. 238. Q. Just to close off on the payments directly to credit cards, then. Would youwhat records would exist based on that pathway that you just described for me? Like, Aramor presumablyyou'd have some, as the administrator
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	Sheet 14 Page 50		Page 52
	M. Morgan - 50		M. Morgan - 52
1	241. Q. Right, soand they may destroy	1	Discovery, and other card holder associations, where
2	their records, but they would be someone logical to	2	there is a sanitized environment and a specific way
3	ask?	23	of handling information, secured information,
4	A. It's possible.	4	encryption, et cetera. It comes right down to your
5	242. Q. Okay, and similarly NX Systems?	5	
6			servers, to your offices, to the facilities. There
7	A. Yes, it's highly likely. What NX		is really strict guidelines. PCI compliance is
	Systems did was, they wouldwe were basically the		expensive, and it's a huge undertaking. And it
8	administrator of all the accounts we would bring to	8	signifies that you're operating as a tech firm, or a
9	them. They would say okay, yes we have service	9	money service business, where there's going to be
10	agreements with all these companies, but you have a	10	certain things involved. So, for us, it wouldn't it
11	login where you're going to administer these sub	11	be worth it unless we were to go public one day, or
12	corporations that are set up, and you're going to do	12	something. You know.
13	everything. Will they have records? Probably.	13	248. Q. And so you've never saw a need for
14	They're a PCI compliant company. They'll have them	14	being PCI compliant?
15	locked up, and if they're subpoenaed they'll	15	A. We looked at it one point in time,
16	provide. Outside of that, it's hard to say what	16	just out of curiousity, and looked at the cost, and
17	they would have and what they wouldn't. I don't	17	the compliance measures, and the reporting measures.
18	know. They didn't do a whole lot with NX Systems.	18	249. Q. So then, what iswhat was your
19	I would say most of the business they did for	19	policy with respect to Banners with respect to
20	payouts was via cash. You know, any EFT records I	20	destruction of records?
21	can provide, if necessary. ACH, you'd have to	21	A. Because we aren't considered PCI
22	subpoena Chuck Gateway for specific names. And, as	22	compliant, any records that we receive of any sort
23	far as cash, you'd have to go after E-Cash, and	23	we destroy them. We have an encrypted file manager.
24	243. Q. Okay, so that's	24	We get it, we process it. We'll keep it on file for
25	A. But we do have records for cash	25	a few weeks, often times, up to a month, just for
	Page 51		
			Page 53
	-		
1	M. Morgan - 51	1	M. Morgan - 53
1 2	M. Morgan - 51 payments if you need them.	1	M. Morgan - 53 reconciliation purposes. And then they're
1 2	M. Morgan - 51 payments if you need them. 244. Q. Right. So obviously there's a	1 2	M. Morgan - 53 reconciliation purposes. And then they're destroyed. Prior to 2012, we had been receiving a
1 2 3	M. Morgan - 51 payments if you need them. 244. Q. Right. So obviously there's a variety of different payment methods?	1 2 3	M. Morgan - 53 reconciliation purposes. And then they're destroyed. Prior to 2012, we had been receiving a lot of our information by email, which is obviously,
1 2	M. Morgan - 51 payments if you need them. 244. Q. Right. So obviously there's a variety of different payment methods? A. There is. We try to stay	1 2 3 4	M. Morgan - 53 reconciliation purposes. And then they're destroyed. Prior to 2012, we had been receiving a lot of our information by email, which is obviously, a little bit dangerous, so we had a file manager
1 2 3 4 5 6	M. Morgan - 51 payments if you need them. 244. Q. Right. So obviously there's a variety of different payment methods? A. There is. We try to stay arms-length from them, in terms of just operating,	1 2 3 4 5	M. Morgan - 53 reconciliation purposes. And then they're destroyed. Prior to 2012, we had been receiving a lot of our information by email, which is obviously, a little bit dangerous, so we had a file manager built that could manage our client's files.
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1 2 3 4 5 6 7	M. Morgan - 51 payments if you need them. 244. Q. Right. So obviously there's a variety of different payment methods? A. There is. We try to stay arms-length from them, in terms of just operating, but not holding accounts, or signing agreements, for this very reason, because there could be a client	1 2 3 4 5 6 7	M. Morgan - 53 reconciliation purposes. And then they're destroyed. Prior to 2012, we had been receiving a lot of our information by email, which is obviously, a little bit dangerous, so we had a file manager built that could manage our client's files. 250. Q. When you say "manage". You mean and destroy them?
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	M. Morgan - 51 payments if you need them. 244. Q. Right. So obviously there's a variety of different payment methods? A. There is. We try to stay arms-length from them, in terms of just operating, but not holding accounts, or signing agreements, for this very reason, because there could be a client like Banners Broker, that we don't know what could happen. Mind you, this is the first time we've had a client that's been accused of a ponzi scheme. All of our clients are really good clients, but they're in areas that have very strict guidelines and compliance measures, that we don't want to take a legal burden for, so they sign agreements with our providers, usually. 245. Q. Okay, so let's go back to that then, in terms of Aramorand I understand your rationale. I think I do. A. Okay. 246. Q. For not keeping records. You mentioned you're not PCI A. Compliant. 247. Qcompliant. What does that mean?	1 2 3 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 21 2 3 4 5 6 7 8 9 0 21 2 3 4 5 6 7 8 9 0 21 2 3 4 5 6 7 8 9 0 21 2 3 4 5 6 7 8 9 0 21 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 8 9 0 11 2 3 4 5 8 9 0 11 2 3 4 5 1 1 2 3 4 5 1 1 2 3 4 5 1 1 1 2 3 4 5 1 1 2 3 4 5 1 1 2 3 1 1 1 2 3 1 1 2 3 1 1 1 2 3 1 1 1 2 3 1 1 1 2 3 1 1 1 2 2 1 2 2 1 2 2 1 2 2 1 2 2 1 2 2 1 2 2 1 2	M. Morgan - 53 reconciliation purposes. And then they're destroyed. Prior to 2012, we had been receiving a lot of our information by email, which is obviously, a little bit dangerous, so we had a file manager built that could manage our client's files. 250. Q. When you say "manage". You mean and destroy them? A. That wasn't a key component, but, to safely transport them to us, to safely get the files, so they felt more secure that it wasn't just being emailed. 251. Q. Was theI mean, was the fact that records were not maintained, was that a request of Banners Broker? A. No, it was not. It wasn't. We don't want to keep credit card records on file, just in case I haveyou know, I don't want to use Tricia as an example, or someone in the Philippines, but they're handling these records. They could take a card number, a credit card account number and buy products with it if they wanted to. They could steal someone's identity with the type of information we get. So it'sit would be prudent
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 2 12 10 10 10 10 10 10 10 10 10 10 10 10 10	M. Morgan - 51 payments if you need them. 244. Q. Right. So obviously there's a variety of different payment methods? A. There is. We try to stay arms-length from them, in terms of just operating, but not holding accounts, or signing agreements, for this very reason, because there could be a client like Banners Broker, that we don't know what could happen. Mind you, this is the first time we've had a client that's been accused of a ponzi scheme. All of our clients are really good clients, but they're in areas that have very strict guidelines and compliance measures, that we don't want to take a legal burden for, so they sign agreements with our providers, usually. 245. Q. Okay, so let's go back to that then, in terms of Aramorand I understand your rationale. I think I do. A. Okay. 246. Q. For not keeping records. You mentioned you're not PCI A. Compliant.	1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 12 3 4 5 1 12 1 1 12 1 1 1 1 1 1 1 1 1 1 1 1 1	M. Morgan - 53 reconciliation purposes. And then they're destroyed. Prior to 2012, we had been receiving a lot of our information by email, which is obviously, a little bit dangerous, so we had a file manager built that could manage our client's files. 250. Q. When you say "manage". You mean and destroy them? A. That wasn't a key component, but, to safely transport them to us, to safely get the files, so they felt more secure that it wasn't just being emailed. 251. Q. Was theI mean, was the fact that records were not maintained, was that a request of Banners Broker? A. No, it was not. It wasn't. We don't want to keep credit card records on file, just in case I haveyou know, I don't want to use Tricia as an example, or someone in the Philippines, but they're handling these records. They could take a card number, a credit card account number and buy products with it if they wanted to. They could steal someone's identity with the type of

	Sheet 15 Page 54 M. Morgan - 54		Page 56 M. Morgan - 56
1	that record safely for the client, and not	1	A. I don't know if I did or not. But
2	ensureand ensure that there's not going to be any	2	if I didn't, I can.
3	demage dene. So we den't want to be held		
1 3	damage done. So we don't want to be held		258. Q. Yes, pleaseI'm not sure that you
4	responsible for that.	4	have either, so why don't we just
5	252. Q. Okay, and now in response to the	5	A. I can give you an excel sheet and
6	Receiver's production request. I know that you gave	6	send it at your convenience.
/	us a lot of bank statements, and I can understand,	7	259. Q. Yes, please. If we couldHoward
8	presumably, you went to the financial institution	8	if we could have an undertaking to have the excel
9	and you were able to obtain those?	9	sheet. And the excel sheet matchesso I
10	A. Yes, that's correct.	110	understandit's going to show
11	253. Q. And, so even if you destroyed bank	11	MS. GOLDBLATT: Mr. Morgan provided this
12	statements that you had, they reside separately at	12	as the receipts that Aramor received.
13	the financial institution, and they'd be accessible?	13	260. MR. WARD: Was thatI think that's
14	A. Yes, we have never destroyed bank	14	part of it.
15	statements that we've had, only because CRA requires	15	THE DEPONENT: Yes.
16	certain records be kept. They're Canadian bank	16	
17	statements, so yes, I kept records of bank	17	BY MR. WARD:
18		18	
19	statements, like this, but they're mostly electronic. If CRA ever came and audited us, yes, I	10	
20			A. I'm assumingI don't know if this
20	could go to the bank and get them. This, in	20	is all of them, but I think, if this is what I gave
21	essence, is kind of an audit of what you needed, so	21	you, then it's probably what we have.
22	I went and got it.	22	262. Q. JustI know we've only got one
23	254. Q. Right.	23	copy of it
24	A. What I do keep is, you know, our own	24	A. Does this state if it's incoming or
25	spending, our own receipts, things like that. But,	25	outgoing?
	Page 55	, <u> </u>	Page 57
	M. Morgan - 55		
1		1	M. Morgan - 57 263. Q. Well it seems to be
1 2	M. Morgan - 55 mostly everything we have, is on, whether you know,	1	M. Morgan - 57 263. Q. Well it seems to be
1 2 3	M. Morgan - 55	1	M. Morgan - 57 263. Q. Well it seems to be A. Incoming. Yes, I would say fairly
1 2 3 4	M. Morgan - 55 mostly everything we have, is on, whether you know, it's credit card or bank statements. They're easily accessed.	1 2 3	M. Morgan - 57 263. Q. Well it seems to be A. Incoming. Yes, I would say fairly accurate.
1 2 3 4	M. Morgan - 55 mostly everything we have, is on, whether you know, it's credit card or bank statements. They're easily accessed. 255. Q. So the personal financial	1 2 3	M. Morgan - 57 263. Q. Well it seems to be A. Incoming. Yes, I would say fairly accurate. 264. Q. But I mean did youdid Aramor
1 2 3 4 5	M. Morgan - 55 mostly everything we have, is on, whether you know, it's credit card or bank statements. They're easily accessed. 255. Q. So the personal financial information that you receive gets routinely	1 2 3 4 5	M. Morgan - 57 263. Q. Well it seems to be A. Incoming. Yes, I would say fairly accurate. 264. Q. But I mean did youdid Aramor prepare that? Or did you prepare it?
1 2 3 4 5 6	M. Morgan - 55 mostly everything we have, is on, whether you know, it's credit card or bank statements. They're easily accessed. 255. Q. So the personal financial information that you receive gets routinely destroyed?	1 2 3 4 5 6	M. Morgan - 57 263. Q. Well it seems to be A. Incoming. Yes, I would say fairly accurate. 264. Q. But I mean did youdid Aramor prepare that? Or did you prepare it? A. I'm 100 percent sure I prepared it
1 2 3 4 5 6 7	M. Morgan - 55 mostly everything we have, is on, whether you know, it's credit card or bank statements. They're easily accessed. 255. Q. So the personal financial information that you receive gets routinely destroyed? A. It does.	1 2 3 4 5 6 7	M. Morgan - 57 263. Q. Well it seems to be A. Incoming. Yes, I would say fairly accurate. 264. Q. But I mean did youdid Aramor prepare that? Or did you prepare it? A. I'm 100 percent sure I prepared it if you have it.
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1 2 3 4 5 6 7 8 9	M. Morgan - 55 mostly everything we have, is on, whether you know, it's credit card or bank statements. They're easily accessed. 255. Q. So the personal financial information that you receive gets routinely destroyed? A. It does. 256. Q. For security reasons? A. For security reasons. Because of	1 2 3 4 5 6 7 8 9	M. Morgan - 57 263. Q. Well it seems to be A. Incoming. Yes, I would say fairly accurate. 264. Q. But I mean did youdid Aramor prepare that? Or did you prepare it? A. I'm 100 percent sure I prepared it if you have it. 265. Q. And you believe it to be accurate? A. Yes.
1 2 3 4 5 6 7 8 9 10	M. Morgan - 55 mostly everything we have, is on, whether you know, it's credit card or bank statements. They're easily accessed. 255. Q. So the personal financial information that you receive gets routinely destroyed? A. It does. 256. Q. For security reasons? A. For security reasons. Because of what was going on with Banners Broker, and a lot of	1 2 3 4 5 6 7 8 9 10	M. Morgan - 57 263. Q. Well it seems to be A. Incoming. Yes, I would say fairly accurate. 264. Q. But I mean did youdid Aramor prepare that? Or did you prepare it? A. I'm 100 percent sure I prepared it if you have it. 265. Q. And you believe it to be accurate? A. Yes. 266. Q. And it doesn't show outgoing,
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$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\17\\18\\9\\21\\22\\22\end{array}$	M. Morgan - 55 mostly everything we have, is on, whether you know, it's credit card or bank statements. They're easily accessed. 255. Q. So the personal financial information that you receive gets routinely destroyed? A. It does. 256. Q. For security reasons? A. For security reasons. Because of what was going on with Banners Broker, and a lot of these people were repeat clients, they had to actually request that we keep wire information on file, or specific cash information on file that we're being used for cash transfers, because it was a lot of repeat business. A lot of repeat money going out, coming in, et cetera. So they had asked us to retain a lot of information. We weren't comfortable with that, necessarily, but when you guys had requested certain information, I had Tricia provide a list of what went out, what came in, just instructions. We don't have the details of the wires. We have names and dates, and you know, we	1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 23 14 5 6 7 8 9 20 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 17 11 23 11 11 23 11 11 23 11 11 11 23 11 11 11 23 11 11 11 11 11 11 11 11 11 11 11 11 11	M. Morgan - 57 263. Q. Well it seems to be A. Incoming. Yes, I would say fairly accurate. 264. Q. But I mean did youdid Aramor prepare that? Or did you prepare it? A. I'm 100 percent sure I prepared it if you have it. 265. Q. And you believe it to be accurate? A. Yes. 266. Q. And you believe it to be accurate? A. Yes. 266. Q. And it doesn't show outgoing, though? A. It doesn't show outgoing. Outgoing might be a little harder for me to gather information on in the time period that you need it. But, you know, we can do our best. 267. Q. Okay, so we're going toGillian's going to have some questions towards the end A. Sure 268. Qon some purely financial accounting aspects of what you've got. So I think that we'll come back to that document. Prepaid credit cards as a method of payouts, there are some

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S	heet 16 Page 58	Page 60	
	M. Morgan - 58	2	Morgan - 60
1	269. Q. Was that an arrangement that was set	1 with us over time. They built their owr	nthey had
2	up through way of introduction, or did you have an	2 two card programs that they built on the second programs that they be second progra	
3	administrative role in that?	3 280. Q. EFT payments?	
4	A. No, we have an administrative role	A EFT payments.	
	in that as well.	5 281. Q. You did this in house, rig	ght?
5	270. Q. And what was that role?	6 A. We did it in house. Canad	
7	A. We have a back end that we can go	7 big market for them, so it was very sm	all. I think
8	ahead and load the cards for them. So, if they're	8 a lot of the payments they did within C	anada might
9	wiring in 200,000 into the account, we go ahead, and	9 have been in relation to services that y	were offered
10	we'd see it loaded into their account, and we can go	0 to them directly. So, stuff they were p	
11	ahead and start adding names and loading the cards.	1 invoiced for, and they asked us to sen	d the payments
12	A. Often times the cards would come to	2 for them.	· · ·
13	our attention, and we'd just forward them over them.	3 282. Q. And that's an electronic	funds
14		4 transfer?	
15	271. Q. Right.	5 A. Yes.	
16	A. That changed over time, and we	6 283. Q. Payments?	
17	actually ended up sending them the cards directly.	7 A. Correct.	
18	272. Q. So Banners could wire money into the	8 284. Q. Okay.	have to
19	Payoneer account?	9 A. So we don'tI don't think t	
20	A. That's correct.	0 a lot of those that were ever done, but	we did a
21	273. Q. And you had account access	1 handful for them. 2 285. Q. And that was done throu	ah 0210606
22 23	privileges? A. That's correct.	2 285. Q. And that was done throu 3 Ontario Limited. So, what records wou	
23	A. That's correct. 274. Q. And then, so you could instruct	4 respect to work that was done in this a	
25	basically which credit cards were going to be	5 A. I'm sure we could find the	names.
	age 59	_ Page 61	
	M. Morgan - 59		Morgan - 61
1	A. That's correct.	that's about it. I don't have any account of the second	nt
2	275. Qloaded up and then the credit	2 information any longer. Those account	its are no
3	cards were either be sent to you to forward on to	3 longer open.	
4	A. Correct.	4 286. Q. Which accounts are you.	
1	276. Q. Did you forward it on to Banners or?	A. They're with Bank of Montr	
6	A. They would come in the cardholders	Vancouver. We had a treasury director	
7	name, and we'd, you know, collect them in bulk and	7 us set those up. They're no longer op	en.
8	hand it over to them. Eventually we had requested	3 287. Q. What's the volume of EF	i payments,
9	that they just have it sent directly, because it was	9 roughly?	
10	administratively getting messy.	A. I can't say. It was more that	
	277. Q. Okay. And what volume of payouts	 20,000. 15,000 maybe. They were ve they were to local guys who, I don't thi 	nk thoy were
12 13	were done, were completed through that method? A. I don't know. It's hard to say.	necessarily affiliates, I think they had, I	
		specific service they provided that they	inaybe a i needed us
14 15	They built their own prepaid card program shortly after they started with us. So, it wasn't very long	to send money to inexpensively. It's w	
16	that they used ours. You know, I want to say maybe	so the cost is pennies.	ianii Gunuuu,
17	a 100,000.	7 288. Q. So this was service provi	iders of
	278. Q. And are there any records that would	Banners, and it was strictly Canadian p	
19	exist in this area?	A. Yes.	,
20	A. Possibly, I don't know.) 289. Q. Okay, and the bank acco	ount that your
21	279. Q. Either at Payoneer or at Aramor?	numbered company used was a Bank	of Montreal
	A. Possibly atdefinitely at	A. Yes.	
22			
22 23	Payoneer, not necessarily at Aramor. I'm sure we	3 290. Qand in Vancouver. So,	we could
22	Payoneer, not necessarily at Aramor. I'm sure we probably destroyed that a long time ago, because they ceased doing any of those types of transaction	get those records? A get those records? A. I can't get you the stateme	

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 32 4 25	 Sheet 17 Page 62 M. Morgan - 62 unless you want to subpoena Bank of Montreal. I don't have access to them any longer. I can get you the names of individuals or companies that were remitted to. 291. Q. I mean, the Bank of Montreal, I guess ismore what I was thinking. If we wanted to just see what went through A. You could, I don't have statements though. Not off hand, anyways. Canada wasn't 292. Q. Bank of Montreal statements though I mean. A. Correct. 293. Q. They'd have copies of them, right? A. They'd have copies of them. 294. Q. Right. A. Sure. I meanyou can contact them, they could get it. I can give youyou know, you have the company name there. We had a lot of EFT business for a lot of other companies. And a significant amount of volume that went through, and none were Banners related. So, Banners was really a client in that realm for only a small period of time. But the statements will show a significant amount for the rest of our clients that are off-shore that need to accept payments in Canada. 	Page 64 M. Morgan - 64 1 suspect your counsel may take under advisement, but 2 we would like either, an authorization and consent 3 for us to make apossibly to make a request of BMO 4 for those records, or alternatively, if it's more 5 convenient for you 6 A. Sure. 7 301. Qto get them for us, I'd ask for 8 that as well. U/T 9 A. Okay. U/T 10 302. Q. Just two more ACH payments? 11 A. Check Gateway. 303. 12 303. Q. Check Gateway? And were you an 13 intermediary there, or was this an introduction? 14 A. It was an introduction. 15 304. Q. Okay. And approximate volumes, 16 payouts? A. Have no idea, actually. I didn't 18 deal with that directly. 305. Q. Okay. 19 305. Q. Okay. A. We had introduced them to a lot of 20 A. We had introduced them to a lot of ACH Companies. Who they signed with, or didn't, I 21 don
	 Page 63	Page 65 M. Morgan - 65 1 States, so I'm not sure what they did with Check 2 Gateway or how much. We had a lot of business with 3 Check Gateway at one point, so we did get a fair 4 amount of commissions at one point. 5 306. Q. So when you make the introduction, I 6 take it this is a case for all of these. You make 7 the introduction, and perhaps you had them off to 8 Check Gateway, but thenis the structure set up so 9 that Aramor gets a commission for all the 10 A. It is. And bear in mind, even 11 though there's agreements, it's a high-risk space. 12 There's still a chance that we don't get it, because 13 companies rob each other from time to time. So 14 we've been in that position, as well. We no longer 15 deal with Check Gateway, so I meanif they did 16 have a relationship, it didn't last very long. 17 UseMyServices also provided similar services to 18 Check Gateway for payments, US and otherwise. And 19 that's somewhere where did get commission from. 20 Now, whether it was ACH th

c	heet 18 Page 66		Page 68
	M. Morgan - 66		M. Morgan - 68
1	collect payments from affiliates, right?	1	would consult Banners on how to deal with them, et
0		2	
2	A. They were, but they also have		cetera, but we don't accept enumeration for that.
3	arrangements and bank relationships where they can	3	It's a part of what we do.
4	do more. So, I don't know the scope of everything	4	317. Q. So where do we see the Aramor
5	they've done. I just know what we collect in	5	contract?
6	commissions. It doesn't have a breakdown of each	6	A. End and begin?
7	country or what they've done.	7	318. Q. Well where do we see the actual
8	308. Q. Right. And then. The cash payouts?	8	paper, the document, the Aramor contract?
	Mihmm	9	
9	A. M'hmm.		A. I think I sent it to you guys. For
	309. Q. As well. The volume there was?	10	wires, outgoing wires, and for
11	A. Pretty high. Maybe as high as a	11	319. Q. For everything, like was there more
12	million.	12	than one contract, or was there just one?
	310. Q. Okay, and what commission would you	13	A. There was just one.
14	get for arranging the cash payouts?	14	320. Q. Okay, so let's have a look at tab
15	Mo got it was a partransaction	15	
	A. We gotit was a per transaction		eight.
16	commission. So, I'd have to go back and look back	16	MR. COHEN: Mr. Ward, what time do you
17	at our records, but you know, I think we might have	17	want to take a break.
18	collected a small percentage of each one, maybe half	18	321. MR. WARD: I guessI say we go for an
19	a percent of each payment that was sent out. Half a	119	hour and half.
20	percent to one percent.	19 20	THE DEPONENT: Do you have to take a
		21	break?
22	for all of thesefor the work that you did?	22	322. MR. WARD: Five minutes, Counsel?
23	A. It was a contract, yes.	23	THE DEPONENT: Unless Howard needs one.
	312. Q. Okay, and we have a contract in the	24	MR. COHEN: I just have to plug in with
25		0.00	
L U	productions that we'll look at in a minute, but who	25	some other things, and set up a timeline.
			some other things, and set up a timeline.
	age 67		Page 69
	age 67 M. Morgan - 67		Page 69 M. Morgan - 69
Pa	M. Morgan - 67 was Aramor's client?	1	M. Morgan - 69 M. Morgan - 69 323. MR. WARD: Well this is going to take us
Ра 1 2	M. Morgan - 67 was Aramor's client? A. Aramor's client was Banners Broker.	1 2	M. Morgan - 69 M. Morgan - 69 323. MR. WARD: Well this is going to take us
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C h a	10 Doco 70		Page 72
	M. Morgan - 70		M. Morgan - 72
1		1	mean we can tell you what our buy rate was offered
	A. It is signed, actually.		
	27. Q. Well it's signed by Smith. It's not	2	to them, but on the schedule, it just has a sell
3	signed by yourself?	3	rate. No, it doesn't have it there right now, but I
4	A. You don't have our counter-signed	4	can send you the copy that does it have it, that
5	copies, I guess.	5	shows you just theirwhat they were paying as the
	28. Q. And there's no appendices either.	6	end listed price.
7	There's references to	7	339. Q. Okay, so I see a reference to an
8	A. I'll get you the full details. U/T	8	addendum A, which we don't have, which is called a
		9	"settlement schedule"?
10	are wewho prepared this? What is it? Why don't	10	A. Yes.
11	you describe it for		340. Q. And
12	A. Sure.	12	A. It's notit really shouldn't be
	30. Qme, and then I'll have it	13	"settlement schedule," addendum A should be the
14	A. It's just our standard electronic	14	schedule of what they pay.
15	processing agreement for disbursements. So, it	15	341. Q. That's in paragraph 12. So the
16	covers funds that we send out for clients, primarily	16	settlement schedule is what Banners Broker pays to
17	in an electronic platform. ACH, EFT, wires, SEPA,	17	Aramor for what?
18	Boleto Bancario in Brazil.	18	A. So for example, if wires are listed
	B1. Q. Where does it do that, because I	19	as the preferred method of sending funds out, it's
20	didn't see that when I looked at it? So justmaybe	20	simply referencing that it's going to be done within
			the time frame that's listed. So yourgly in the
21	you can walk me	21	the time frame that's listed. So, usually in the
22	A. It's loosely referenced. It's not	22	schedule A, it will say they're paying a certain
23	in there, specifically, butit's just open ended.	23	amount for wire services done within 48 to 72 hours
	32. Q. Okay. So whois this is an Aramor	24	of file being upload. It's going to reference that.
25	document?	25	That's all.
Pag			Page 73
Pag			Page 73 M. Morgan - 73
Pag	M. Morgan - 71 A. Yes, it is.	1	M. Morgan - 73
1	M. Morgan - 71 A. Yes, it is.	1	M. Morgan - 73 342. Q. I mean, it's paying Aramor, right,
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1 2 3 4 5 6 7 8 33 9 10 11 33 12 13 14 15 33 16 17 18 33 19 20 21 22 23 33	M. Morgan - 71 A. Yes, it is. 3. Q. And did you prepare this, or did you A. Loosely, you know, with a little bit of legal input. It's loosely prepared. Nobody really adheres to the agreements 100 percent, but it is what it is. 4. Q. And this is Aramor's agreement with Banners Broker Limited? A. Yes, it is. 5. Q. Were there any other written agreements apart from this one, at any time? A. Not that I can recall, no. Not between Aramor and Banners. 6. Q. And you're going toyou believe that you have a fully signed copy with appendices? A. I do. I can get that over to you. U/T 7. Q. Okay, great. And, so if I could have then A. It will have a schedule of what they were paying for specific services referenced, and you can take it from there. 8. Q. Okay, and the scheduleit's a	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 15 16 17 10 11 12 12	M. Morgan - 73 342. Q. I mean, it's paying Aramor, right, that's what addendum A is, it's a payment of your A. Paying to Aramor? 343. Qschedule of your fees, of your company? A. Yes, but we had different clients that pay in different ways. So, some will send us their file and their funds, and we debit it from that funds. Or some of our clients we invoice. So, yes. 344. Q. But, for Banners? A. For Banners, it would be all included, so we would take it out of what they send us. 345. Q. Okay. A. Yes. 346. Q. And is thatwhatever you did, is that described on this addendum A A. It is. 347. Qthat we don't have? A. Yes. 348. Q. And then further on in the document, there's another reference to an addendum A, and it

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	Sheet 20 Page 74 M Margan 74		Page	
	M. Morgan - 74			M. Morgan - 76
1	sets out return processing fees?	1		we're dealing with. If he had funds sent from some
2	A. Yes. So, if something bounces back	23		of his other named companies, that was his right to
3	to us, or something gets returned for whatever	3		do so, only because, you know, we have clients that
4	reason. It's an invalid account number, or a closed	1		do that to protect themself from certain tax
5		4 5		
5	account, or any number of reasons, then there are			liabilities. Maybe one of the companies is a
6	fees for that	6		holding company, and they have several subsidiaries,
1	349. Q. Okay.	7		et cetera. But the agreement was with Banners
8	Athat we charge the client or	8		Broker. It was understood that Chris' funds would
9	merchant.	9		come from various different accounts, and that
10	350. Q. And they'd be set out on addendum A,	10		wasthat's not unusual.
11	as well?	11	362.	
12	A. That's correct.	12	006.	again, just for the record, I'd like an undertaking,
13	351. Q. So is it fair to say that addendum A	13		Counsel, and I think I have it from Max to produce a
14				
	has	14		complete signed copy of this with any addendum?
15	A. Has all the pricing.	15		A. Yes, that's fine.
16	352. Q. Yes, which you're going to provide	16		MR. COHEN: Well, technically I'll give
17	to mehas all of the means in that Aramor was	17		you my best efforts to provide what the
18	compensated? All of that?	18		gentlemen is undertaking to do. But,
19	A. That's accurate.	19		because I haven't seen any of the documents
20	353. Q. And is there any other compensation	20		myself, I'm not giving you an official
21	you received?	21		undertaking.
22	A. Outside of that?	22	363.	
23		23	000.	
24		20		advisement, then?
25	question for the record	24		MR. COHEN: Well, no, I'm saying
	A. I'm sorry, apologies.	20		something a little bit different, because
	Page 75		Page	
	M. Morgan - 75		Page	M. Morgan - 77
1	M. Morgan - 75 355. Q. Is there any compensation that	1	Page	M. Morgan - 77 to me, a formal undertaking has
1	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not	1	Page	M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I
1 2 3	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum	1	Page	M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I
1 2 3	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not	1	Page	M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's
1 2 3 4	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A?	1	Page	M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see
1 2 3 4 5	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no.	1 2 3 4 5	Page	M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their
1 2 3 4 5 6	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete	1 2 3 4 5 6	Page	M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll
1 2 3 4 5 6 7	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement?	1 2 3 4 5 6 7		M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them.
1 2 3 4 5 6 7 8	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement? A. That would be complete, yes.	1 2 3 4 5 6 7 8	Page 364.	M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them. MR. WARD: Okay, I think we're talking
1 2 3 4 5 6 7 8 9	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement? A. That would be complete, yes. 357. Q. And when we talk about Banners	1 2 3 4 5 6 7 8 9		M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them. MR. WARD: Okay, I think we're talking about the same thing. I mean, you're
1 2 3 4 5 6 7 8 9 10	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement? A. That would be complete, yes. 357. Q. And when we talk about Banners Broker, we're talking about Banners Broker Limited?	1 2 3 4 5 6 7 8 9 10		M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them. MR. WARD: Okay, I think we're talking about the same thing. I mean, you're saying not until you see, you don't' want
1 2 3 4 5 6 7 8 9 10 11	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement? A. That would be complete, yes. 357. Q. And when we talk about Banners Broker, we're talking about Banners Broker Limited? A. Yes, that is correct.	1 2 3 4 5 6 7 8 9 10 11		M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them. MR. WARD: Okay, I think we're talking about the same thing. I mean, you're saying not until you see, you don't' want to undertake to produce it, but you'll take
1 2 3 4 5 6 7 8 9 10 11 12	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement? A. That would be complete, yes. 357. Q. And when we talk about Banners Broker, we're talking about Banners Broker Limited? A. Yes, that is correct. 358. Q. They're the contracting party?	1 2 3 4 5 6 7 8 9 10 11 12		M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them. MR. WARD: Okay, I think we're talking about the same thing. I mean, you're saying not until you see, you don't' want
1 2 3 4 5 6 7 8 9 10 11	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement? A. That would be complete, yes. 357. Q. And when we talk about Banners Broker, we're talking about Banners Broker Limited? A. Yes, that is correct.	1 2 3 4 5 6 7 8 9 10 11		M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them. MR. WARD: Okay, I think we're talking about the same thing. I mean, you're saying not until you see, you don't want to undertake to produce it, but you'll take my request under advisement?
1 2 3 4 5 6 7 8 9 10 11 12 13 14	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement? A. That would be complete, yes. 357. Q. And when we talk about Banners Broker, we're talking about Banners Broker Limited? A. Yes, that is correct. 358. Q. They're the contracting party? A. That's correct.	1 2 3 4 5 6 7 8 9 10 11 12 13	364.	M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them. MR. WARD: Okay, I think we're talking about the same thing. I mean, you're saying not until you see, you don't' want to undertake to produce it, but you'll take my request under advisement? MR. COHEN: That's right. U/A
1 2 3 4 5 6 7 8 9 10 11 12 13 14	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement? A. That would be complete, yes. 357. Q. And when we talk about Banners Broker, we're talking about Banners Broker Limited? A. Yes, that is correct. 358. Q. They're the contracting party? A. That's correct. 359. Q. And that's Chris Smith's	1 2 3 4 5 6 7 8 9 10 11 12 13 14		M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them. MR. WARD: Okay, I think we're talking about the same thing. I mean, you're saying not until you see, you don't want to undertake to produce it, but you'll take my request under advisement? MR. COHEN: That's right. U/A MR. WARD: And what
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1 2 3 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0	M. Morgan - 75 355. Q. Is there any compensation that Aramor received, at any point in time, that's not consistent with what we're going to see on addendum A? A. No, not from Banners Broker, no. 356. Q. So that would be a complete statement? A. That would be complete, yes. 357. Q. And when we talk about Banners Broker, we're talking about Banners Broker Limited? A. Yes, that is correct. 358. Q. They're the contracting party? A. That's correct. 359. Q. And that's Chris Smith's A. Chris Smith 360. Qcompany?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	364. 365.	M. Morgan - 77 to me, a formal undertaking has consequences for the solicitor, and I haven't seen the documents. And he's saying he can provide them. So if I see the documents, and I'm satisfied their consistent with the undertaking, then I'll provide them. MR. WARD: Okay, I think we're talking about the same thing. I mean, you're saying not until you see, you don't' want to undertake to produce it, but you'll take my request under advisement? MR. COHEN: That's right. U/A MR. WARD: And what MR. COHEN: You know, you said at the outset that this matter is not litigious?
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	Sheet 21 Page 78	Page 80
	M. Morgan - 78	M. Morgan - 80
1	369. MR. WARD: Fair enough, all right. But	1 our agreement is with the payment processors, or
2	it is somethingthe Receiver would like	2 banks, that are going to send us our commissions. 3 376. Q. Right, right. And, so you had
3	to see, because it relates to the entity	
4	that is in Receivership.	4 commission agreements?
5	MR. COHEN: I don't intend to obfuscate	5 A. Correct.
6	the process of obtaining documentation. I	6 377. Q. With the payment processors?
7	don't want to be responsible for it, unless	
8	I knowunless I've seen it, so that I	8 378. Q. In relation to Banners Broker?
9	know that it's connected to what my client	9 A. In relation to any merchant we 10 bring. It's not specific to one merchant. So, if
11	is capable of providing. 370. MR. WARD: Okay. I'm completely	10 bring. It's not specific to one merchant. So, if 01 our relationship withour relationship with
12	comfortable with that.	12 Banners Broker isn't unique in any way, is what I'm
13	MR. COHEN: A lot of times all this	13 saying. We have a relationship with the payment
14	falls on the shoulders of the lawyer.	14 processor that Aramor can mark up our rates to a
15	371. MR. WARD: Yes. Okay, no I'm fine with	15 certain point, where we can collect x amount of
16	that.	116 dollars on it. Each deal is a bit different, but
17	MR. COHEN: And then there's	17 it's understood that we're going to receive our
18	consequences for the lawyer.	18 commissions each month, or each week, or whatever
19 20		19 the settlement period is. And, we expect our
20	BY MR. WARD: 372. Q. Okay, Max this isn'tI don't see a	20 processors to abide by it. 21 379. Q. Okay. And, just before we leave
22	372. Q. Okay, Max this isn'tI don't see a date onwell I doI see one date on the	21 379. Q. Okay. And, just before we leave 22 this exhibit. Show me, where do I see the services
23	second-last page, beside a blank signature line, but	23 that you're providing toAramor's providing to
24	why don't you tell me, to the best of your	24 Banners? Is that on the first page?
25	knowledge, when was this prepared?	24 Banners? Is that on the first page? 25 A. That would probably be in the
	Page 79	Page 81
	M. Morgan - 79	M. Morgan - 81
1	M. Morgan - 79 A. 2012.	M. Morgan - 81 1 addendum, in terms of specifics, for what we would
1	M. Morgan - 79 A. 2012. 373. Q. April 2012?	M. Morgan - 81 1 addendum, in terms of specifics, for what we would 2 have given them. ACHnot ACH sorryEFT and
1 2 3	M. Morgan - 79 A. 2012. 373. Q. April 2012? A. I imagine that would be the day.	M. Morgan - 81 1 addendum, in terms of specifics, for what we would 2 have given them. ACHnot ACH sorryEFT and 3 wires. I don't think there was anything else.
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	Sheet 22 Page 82		Page 84
	M. Morgan - 82		M. Morgan - 84
1	agreement ceased.	1	shut down by the
2	384. Q. The agreement with CIBC?	2	A. No, that had nothing to
3	A. And with Banners, for the most part.	23	394. Qfinancial institution, at any
4	385. Q. Okay.	4	point?
5	A. We just told them we can't do	5	Awith Banners Broker, no.
6	anything for you.	6	395. Q. And apart from CIBC, did any other
7	386. Q. Right.	1 7	financial institutions in Canada terminate Aramor's
8	A. The bank compliance has some	8	account relationship, on account of Banners Broker?
9	problems, and, so we'll continue sourcing what you	9	A. No, not at all.
10	need for credit card and anything else, but we can't	10	396. Q. Did any other financial
11	do anything directly for you anymore, because it's	11	institutions, anywhere in the world, terminate
12	jeopardizing our relationships.	12	Aramor's account relationship on account of Banners?
13	387. Q. Right. And did CIBC, at some point,	13	A. No.
14	terminate Aramor as a customer?	14	397. Q. So it was just the CIBC?
15	A. They did.	15	A. It was just CIBC, which was our
16	388. Q. And when was that?	116	primary account. They werethey did a lot of
17	A. That was, I'm going to say the end	17	great things for us. So that was a sour point for
18	of 2012. December 2012.	18	US.
19	389. Q. Okay, and they did that because of	19	398. Q. And it as just those four accounts
20	the relationshipthe work you were doing with	20	at CIBC, as well?
21	Banners?	21	A. That's correct.
22	A. They were never explicitly put that	22	399. MR. WARD: Okay, I understand. So let's
23	in writing, but, you know, we were told, you know.	23	mark the Aramor contract as Exhibit 1,
24	As much information we tried to gather, we were told	24	Counsel.
25	this was the reason, you knowtoo manythere	25	
· · · · · · · · · · · · · · · · · · ·	Page 83	J	
			Page 85
][Page 85 M. Morgan - 85
1	M. Morgan - 83	1	M. Morgan - 85
1	M. Morgan - 83 were these incoming wires, a lot of them incorrectly	1	M. Morgan - 85 EXHIBIT NO. 1: Contract between Aramor and Banners
1 2	M. Morgan - 83 were these incoming wires, a lot of them incorrectly sent, a lot of it was botched, a lot of it looked	1 2	M. Morgan - 85
1	M. Morgan - 83 were these incoming wires, a lot of them incorrectly sent, a lot of it was botched, a lot of it looked really ugly. The history we had with CIBC, we did a	1 2 3	M. Morgan - 85 EXHIBIT NO. 1: Contract between Aramor and Banners Broker
1 2 3 4	M. Morgan - 83 were these incoming wires, a lot of them incorrectly sent, a lot of it was botched, a lot of it looked really ugly. The history we had with CIBC, we did a lot more volume then what you see there over the	1 2 3 4	M. Morgan - 85 EXHIBIT NO. 1: Contract between Aramor and Banners Broker MR. COHEN: Your copy just has Smith's
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1 2 3 4	M. Morgan - 83 were these incoming wires, a lot of them incorrectly sent, a lot of it was botched, a lot of it looked really ugly. The history we had with CIBC, we did a lot more volume then what you see there over the years. But it was very well organized, very clean, very well orchestrated, and the Banners process,	1 2 3 4	M. Morgan - 85 EXHIBIT NO. 1: Contract between Aramor and Banners Broker MR. COHEN: Your copy just has Smith's
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1 2 3 4 5 6 7 8 9 10 11 12 13	M. Morgan - 83 were these incoming wires, a lot of them incorrectly sent, a lot of it was botched, a lot of it looked really ugly. The history we had with CIBC, we did a lot more volume then what you see there over the years. But it was very well organized, very clean, very well orchestrated, and the Banners process, with wires coming in from their customers was very messy. 390. Q. Okay. A. Prior to that, the only wires we had ever incoming to any of our accounts, was corporate wires. Never from individuals that have no idea what they're doing when they go to the bank to send	1 2 3 4 5 6 7 8 9 10 11 12 13	M. Morgan - 85 EXHIBIT NO. 1: Contract between Aramor and Banners Broker MR. COHEN: Your copy just has Smith's signature on it? 400. MR. WARD: Yes. BY MR. WARD: 401. Q. Alright, justMax, before I get to some of your other documents, because there is two more things we want to do today. A. Sure. 402. Q. And then we're going to get to some
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 2 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1	M. Morgan - 83 were these incoming wires, a lot of them incorrectly sent, a lot of it was botched, a lot of it looked really ugly. The history we had with CIBC, we did a lot more volume then what you see there over the years. But it was very well organized, very clean, very well orchestrated, and the Banners process, with wires coming in from their customers was very messy. 390. Q. Okay. A. Prior to that, the only wires we had ever incoming to any of our accounts, was corporate wires. Never from individuals that have no idea what they're doing when they go to the bank to send a wire. So, we'd have missing wires on a daily basis. There's probably about 200,000 of wires missing, coming into CIBC, just from people who didn't send them correctly. 391. Q. Okay, so Aramor's account relationship at CIBC was shut down? A. Yes. 392. Q. I know that, as well, through your affiliated company, you had a banking relationship	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	M. Morgan - 85 EXHIBIT NO. 1: Contract between Aramor and Banners Broker MR. COHEN: Your copy just has Smith's signature on it? 400. MR. WARD: Yes. BY MR. WARD: 401. Q. Alright, justMax, before I get to some of your other documents, because there is two more things we want to do today. A. Sure. 402. Q. And then we're going to get to some of the other documents in this binder, which are some Chris Smith documents, because I think they're important A. Okay. 403. Qto the Receiver understanding work that Aramor did. A. Sure. 404. Q. And then, as well, finallyand I'm not sure when we'll get to this, but we also have

	Sheet 23 Page 86	Page 88
	M. Morgan - 86	M. Morgan - 88
1	A. Sure.	1 withwe would broker the arrangement between
2	405. Qthat we have so far.	2 Banners Broker and whoever the credit card processor
3	A. Okay.	 Banners Broker and whoever the credit card processor was. So one was Beanstream, out of Victoria, BC.
4	406. Q. Okay?	4 The other was Allied Wallet. And, essentially what
5	A. What time do we have to be out of	
6	here, Howard?	6 416. Q. Was there any others, apart from
7	MR. COHEN: Well you have half a day	7 Beanstream and Allied Wallet? What about Use My
8	booked, right?	8 Services?
9	407. MR. WARD: Yes, we've onlywe figured	9 A. Yes, but they didn't do credit
10	we start with half a day.	10 cards, they had alternative payment services.
11	THE DEPONENT: So 2 o'clock?	11 417. Q. Okay, so for the credit cards it was
12	MR. COHEN: What time	12 just Beanstream and Allied Wallet?
13	THE DEPONENT: 1 o'clock.	13 A. Beanstream and Allied Wallet, yes.
14	MR. COHEN: What time do you want to go	14 They might have had others, but not through us.
15	to?	15 418. Q. Okay, and you brokered both of these
16	408. MR. WARD: Well, normally we go to 1.	16 relationships?
17	Let's just go off the record.	17 A. Yes, that's correct.
18		18 419. Q. And was it Beanstream first, and
19	DISCUSSION OFF THE RECORD	19 then Allied Wallet?
20	BIOCOCOUNT THE RECORD	20 A. That's correct. So Beanstream did
21	MR. COHEN: Okay, so let's go to 1:30	21 some volume with them. They did some volume with
22	then?	
23	409. MR. WARD: Yes.	
20	403. WIN. WARD. 165.	
24	THE DEPONENT: Okay.	24 believeactually, I can't give you a reason they 25 shut them down. Sometimes processors shut down
25	MR. COHEN: Okay, firé away.	25 shut them down. Sometimes processors shut down
	Page 87	Page 89
	M. Morgan - 87	M. Morgan - 89
	BY MR. WARD:	1 companies, but I don't think it was anything
2	410. Q. Max, you've given me a lot of	2 illegal.
3	information on the work that you did for Banners, in	3 420. Q. Beanstream shut down?
4	relation to payouts?	4 A. Yes.
5	A. M'hmm.	5 421. Q. The Banners account?
6	411. Q. Okay. And you've told me that you	6 A. That's correct. Beanstream
7	weren't exclusive in relation to payouts?	7 specializes in retail. And some light e-commerce,
8		
	A. I don't believe I was. I wasn't	8 you know, if you have a little web design company,
9	A. I don't believe I was. I wasn't privy to whoever else. I just heard different	8 you know, if you have a little web design company, 9 or something. But, they don't specialize in very
10	privy to whoever else. I just heard different	8 you know, if you have a little web design company, 9 or something. But, they don't specialize in very
10 11	privy to whoever else. I just heard different things.	 8 you know, if you have a little web design company, 9 or something. But, they don't specialize in very 10 complex, high-risk companies. High-risk meaning,
10	privy to whoever else. I just heard different things. 412. Q. What was the second major category	 8 you know, if you have a little web design company, 9 or something. But, they don't specialize in very 10 complex, high-risk companies. High-risk meaning,
10 11 12	privy to whoever else. I just heard different things. 412. Q. What was the second major category of work that you did for Banners, apart from	 8 you know, if you have a little web design company, 9 or something. But, they don't specialize in very 10 complex, high-risk companies. High-risk meaning, 11 there are companies that Canadian banks typically
10 11 12 13	privy to whoever else. I just heard different things. 412. Q. What was the second major category of work that you did for Banners, apart from payouts?	 you know, if you have a little web design company, or something. But, they don't specialize in very complex, high-risk companies. High-risk meaning, there are companies that Canadian banks typically won't take. 422. Q. Okay.
10 11 12 13 14	privy to whoever else. I just heard different things. 412. Q. What was the second major category of work that you did for Banners, apart from payouts? A. I would saydo you mean directly	 8 you know, if you have a little web design company, 9 or something. But, they don't specialize in very 10 complex, high-risk companies. High-risk meaning, 11 there are companies that Canadian banks typically 12 won't take. 13 422. Q. Okay. 14 A. And being a high-risk e-commerce
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10 11 12 13 14 15 16 17 18 19 20 21 22	 privy to whoever else. I just heard different things. 412. Q. What was the second major category of work that you did for Banners, apart from payouts? A. I would saydo you mean directly Aramor and Banners? 413. Q. Directly or indirectly. A. Indirectly, I'd say credit card processing. That wasthat's where we earned the most money. 414. Q. Let's talk about credit card processing for a couple minutes? A. Sure. 	 you know, if you have a little web design company, or something. But, they don't specialize in very complex, high-risk companies. High-risk meaning, there are companies that Canadian banks typically won't take. 422. Q. Okay. A. And being a high-risk e-commerce operated that Beanstream, sorry Banner was, we took them to Allied Wallet, which was prepared to take on their business. I can't give you exact totals, as to what they did anywhere from five to eight million dollars, on a monthly basis. So, our commissions were fairly lucrative from that. 423. Q. So let'sand then at some point

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1 2 3 4 5 6 7 8 9 10 11 12 13 4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22 23	 Sheet 24 Page 90	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\23\\14\\15\\16\\7\\8\\9\\21\\22\\23\end{array}$	 M. Morgan - 92 "What the heck is going on with your client? You know, we're seeing ten charge backs this month" And you know, they say, "is there a spike in charge backs from the US?" Or this or that. Maybe they want to understand why, or they want to get an understanding as to if there's an explanation. And so, we will arrange to help provide that information for them. So really its to soften the blow for the merchant. We stand in between just to do that. We can sell the merchant better than they can sell themself usually. 430. Q. But you didn'tI take it Aramor didn't have a contract with Beanstream? A. No. 431. Q. Did you have a commission agreement with them? A. We did have a commission agreement with them. 432. Q. And, a commission agreement, in relation to Banners Broker? A. Correct. 433. Q. Okay, so
24 25	which they do. We help the client with the application and any documentation. If there is	24 25	A. Not specific to Banners Broker, just in general. So, we have a reseller agreement with
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 Page 91 M. Morgan - 91 something they need to change on their site, we'll advise them to so. If there is something they need to add, if they need a secondary signer, someone's name is tainted, we'll tell them to pull it off, and put someone else's name. Things like that. 428. Q. So once and you helped them with their account application to Beanstream? A. We did, and then we alsowe advise, we don't touch anything. But we'll advise certain things that we know the processor will want to see. Not anything dishonest, but obviously, worded carefully. We help with technical integration to a limited degree, meaning, if there's specific things that they'll want to see from a fraud measurement standpoint, et cetera, on their website, we'll certainly advise on that, as well. So, it's more of a consulting role. 429. Q. So after the introduction, and the establishment of the relationship, you have an administrative troubleshooting role A. No. The role after thatboth parties need to get on a phone call. If something really catastrophic happens, we'll arrange a phone call, but outside of that. Often times a processor may contact us and say, you know: 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	M. Morgan - 93 Beanstream, where we are able to mark up our pricing by a certain percentage, and we get a monthly commission from that. 434. Q. So, just what was the commission? A. I can't recall. 435. Q. In the reseller agreement? A. It wasn't very large, because Beanstream's prices, and their services are very retail-orientated. We're in the high-risk space, we can charge a lot more, typically, so I don't know. We might have made, total, four or five grand. It wasn't very much, over the course of four months. 436. Q. So it would be a fraction of a percent of the A. Yes. 437. Qcredit card payments that were processed by Beanstream? A. Correct, yes. So it wasI don't have the exact numbers. I mean, but it was pretty small. They didn't do. They did a decent volume with them, but there wasn't very much we could earn. There are limitations placed on us. 438. Q. Sorry, just a quick sec. A. Sure. 439. Q. And, so the Beanstream relationship

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	Sheet 25 Page 94	F	Page 96
	M. Morgan - 94		M. Morgan - 96
1	ended, and you described for us, they became	1	just because I had an existing relationship with
	uncemfertable Lauces with		them and the work compating could be done. And
2	uncomfortable I guess, with	23	them, and I thought something could be done. And
3	A. Yes, we are uncertain as to why they		these guys need to be up quickly, so I got them up
4	ended it. I think it was just, yes, just	4	quickly. But, you know, we were happy that
5	discomfort.	5	relationship ended because we weren't making the
6	440. Q. And then Allied Wallet started?	6	money we wanted to make on such a lucrative account.
7			
	A. Allied Wallet, there was probably		With Allied, we didn't have to charge them the
8	some overlap. I would say they started maybe in	8	world, and we still made a lot of money.
9	March.	9	449. Q. Yes. So tell me about Allied, then,
10	441. Q. Okay.	10	because we'veobviously we've spoken to Allied
11	A. I'd have to check to my records,	11	Wallet, as well. What was the did you have a
12	exactly when they started, but the bulk of 2012 was	12	written agreement with Allied
13	Allied Wallet.	13	A. Yes.
14	442. Q. And what yourwhat was Aramor's	14	450. Qlike a reseller agreement?
15	role in relation to Banners/Allied Wallet?	15	A. Yes we do.
16	A. Similar to Beanstream. Allied was		451. Q. And, was it specific to Banners
17	more prepared to take on a high-risk merchant like	17	Broker, or was it generic?
18	this, and we did the introduction. We set the	18	Á. Generic, yes.
19	rates, and you know, if any changes need to be		452. Q. And was Banners Broker the largest
20		20	
20	done to their sites, or any compliance measures that		of the customers that you had with Allied?
21	Beanstreamsorry Allied Wallet asked for, we would	21	A. Yes it was.
22 23	go to Banners and ask for it. So it was,		453. Q. And, did you have some sense of the
23	reallyit's just a lot of back and forth really,	23	volume of transactions that credit cards payments
24	between us and Allied Wallet.	24	that were processed through Allied?
25	443. Q. Erin just passed me a note that,	25	A. On average, I would say two to three
<u> </u>	Page 95		age 97
	M. Morgan - 95] [*	M. Morgan - 97
4	IVI. IVIOIYali - 30 according to the Bassiver's investigations to date	-	
	according to the Receiver's investigations to date,		million, on the high end. I know, there's some
23	it looks like about four million in Banners Brokers	2	months they did five to seven million.
	transactions that went through Beanstream, in terms	3	454. Q. Okay.
4	of aradit aard navmanta that ware pressed?		
1	of credit card payments that were processed?	4	A. Yes.
45		4	A. Yes.
	A. Yes, that accurate.	5	A. Yes. 455. Q. And what were thewhat was the
6	A. Yes, that accurate. 444. Q. Does that sound about right?		A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied?
6 7	A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure.	5 6 7	A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact
6 7 8	A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible.	5 6 7 8	A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you
6 7 8 9	A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that	5 6 7 8 9	A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain
6 7 8 9 10	A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a	5 6 7 8 9	A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from
6 7 8 9 10 11	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 	5 6 7 8 9 10	A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they
6 7 8 9 10 11 12	A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a	5 6 7 8 9 10 11 12	A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they
6 7 8 9 10 11 12 13	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? 	5 6 7 8 9 10 11 12	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of
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6 7 8 9 10 11 12 13	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation 	5 6 7 8 9 10 11 12 13 14	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop.
6 7 8 9 10 11 12 13 14 15	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions 	5 6 7 8 9 10 11 12 13 14 15	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay.
6 7 8 9 10 11 12 13 14 15 16	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions A. No. 	5 6 7 8 9 10 11 12 13 14 15 16	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay. A. That was towards the end.
6 7 8 9 10 11 12 13 14 15 16 17	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions A. No. 447. Qwas there introduction fee? 	5 6 7 8 9 10 11 12 13 14 15 16 17	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay. A. That was towards the end. 457. Q. So, Counsel, could I have an
6 7 8 9 10 11 12 13 14 15 16 17 18	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions A. No. 447. Qwas there introduction fee? A. No, there was nothing like that. 	5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay. A. That was towards the end. 457. Q. So, Counsel, could I have an undertaking, or an under advisement, or however you
6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions A. No. 447. Qwas there introduction fee? 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay. A. That was towards the end. 457. Q. So, Counsel, could I have an undertaking, or an under advisement, or however you want leave it, to get
6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions A. No. 447. Qwas there introduction fee? A. No, there was nothing like that. Bear in mind, we don't deal with local retail 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay. A. That was towards the end. 457. Q. So, Counsel, could I have an undertaking, or an under advisement, or however you want leave it, to get
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions A. No. 447. Qwas there introduction fee? A. No, there was nothing like that. Bear in mind, we don't deal with local retail operations. Typically in Canada, as far as processors First Data, Moneris, any of those guys, 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay. A. That was towards the end. 457. Q. So, Counsel, could I have an undertaking, or an under advisement, or however you want leave it, to get MR. COHEN: I'll put on my best efforts to assist.
6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions A. No. 447. Qwas there introduction fee? A. No, there was nothing like that. Bear in mind, we don't deal with local retail operations. Typically in Canada, as far as processors First Data, Moneris, any of those guys, because there's no money in it for us, as you can 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay. A. That was towards the end. 457. Q. So, Counsel, could I have an undertaking, or an under advisement, or however you want leave it, to get MR. COHEN: I'll put on my best efforts to assist. 458. MR. WARD: The best efforts to produce,
6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22 23	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions A. No. 447. Qwas there introduction fee? A. No, there was nothing like that. Bear in mind, we don't deal with local retail operations. Typically in Canada, as far as processors First Data, Moneris, any of those guys, because there's no money in it for us, as you can see. 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay. A. That was towards the end. 457. Q. So, Counsel, could I have an undertaking, or an under advisement, or however you want leave it, to get MR. COHEN: I'll put on my best efforts to assist. 458. MR. WARD: The best efforts to produce, if available, the reseller agreements in
6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	 A. Yes, that accurate. 444. Q. Does that sound about right? A. It could. I'm not 100 percent sure. In all their time with Beanstream, it's possible. But, our percentage on that was so small that 445. Q. Well it sounds likeif it was a four million dollars in volume, and you got four or 5,000? A. Yes, it was very small. 446. Q. Was there any other compensation apart from the commissions A. No. 447. Qwas there introduction fee? A. No, there was nothing like that. Bear in mind, we don't deal with local retail operations. Typically in Canada, as far as processors First Data, Moneris, any of those guys, because there's no money in it for us, as you can 	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Yes. 455. Q. And what were thewhat was the commission fee structure with Allied? A. I can't remember what wethe exact percentage. I'd have to go back and look. But, you know, on average, over a certain amountscertain months that we had with them, it could range from 40,000 a month to 110,000 a month. When they started to taper down, it would go into the tens of thousands, and the single digits, then hundreds, then it would stop. 456. Q. Okay. A. That was towards the end. 457. Q. So, Counsel, could I have an undertaking, or an under advisement, or however you want leave it, to get MR. COHEN: I'll put on my best efforts to assist. 458. MR. WARD: The best efforts to produce,

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	Chect 26 Dage 89		Page 100
	Sheet 26 Page 98 M. Morgan - 98		
		11 .	M. Morgan - 100
	MR. COHEN: Okay. U/T		addendum. But, it was really just to allow them the
2	459. MR. WARD: Thank you.	23	convenience of having some of their customers send
3		3	in money, because they had nowhere else to get it.
4	BY MR. WARD:	4	And they're Canadian accounts, and offshore accounts
5	460. Q. Now, would youwould there be	5	couldn't accept so many wires like that. Whereas
6	commission fee statements for the work that you did	6	CIPC out us some cleak. I had a good relationship
	commission ree statements for the work that you du		CIBC cut us some slack. I had a good relationship
1 .	on the credit card payment services side?	7	with the manager at CIBC, and she was very kind to
8	A. For Allied Wallet, yes. Beanstream,	8	us. But again, they ended that relationship by how
9	l don't necessarilyl don't know if l just didn't	9	they used it.
10	keep a record of it or not. But, Allied, yes, they	110	468. Q. Right, so that service, just to put
11	made a concerted effort to. Beanstream, I think you	111	a name of it, would be like, receipt of wire
12	had to login to your back end and you'll see your	12	transfers, right?
13	statements.	13	A. Sure, we could do that.
14	461. Q. Right.	14	
14		114	
15	A. Whereas, Allied sent them, dedicated	15	time would come in from affiliates?
16	to us, every month.	16	A. Yes.
17	462. Q. Were there any other statements that	17	470. Q. Around the world?
18	you received from Beanstream or Allied, having to	18	A. That's correct.
19	do	19	471. Q. Right. And, they would be sent into
20	A. With the processing?	20	your CIBC accounts?
21	463. Qwith the commission and	21	A. That's correct.
22	processing for Banners Broker?	22	472. Q. Were they sent anywhere else apart
23	A. No, not with the processing. I mean	23	from those CIBC accounts?
24		24	
25	with Allied we have such a good relationship with	25	A. No, they were not. 473. Q. And then, what would happen to them
20	them. If there was anything we wanted to see,	120	473. Q. And then, what would happen to them
L			
	Page 99		Page 101
	Page 99 M. Morgan - 99		Page 101 M. Morgan - 101
1	M. Morgan - 99 M. Morgan - 99 they're very transparent. And their reputation is	1	M. Morgan - 101 M. Morgan - 101 once they reached the CIBC accounts? What would you
1	M. Morgan - 99 M. Morgan - 99 they're very transparent. And their reputation is	1	Page 101 M. Morgan - 101
1	M. Morgan - 99 M. Morgan - 99 they're very transparent. And their reputation is very strong, so no, we just looked at the	1 2 3	M. Morgan - 101 Once they reached the CIBC accounts? What would you do?
1 2 3	M. Morgan - 99 M. Morgan - 99 they're very transparent. And their reputation is very strong, so no, we just looked at the commissions. We had an idea of what they	1 2 3	M. Morgan - 101 M. Morgan - 101 once they reached the CIBC accounts? What would you do? A. We would either remit it to them, to
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	Sheet 27 Page 102 M. Morgan - 102		Page	104 M. Morgan - 104
1		1		us in the moment.
	need to be very timely with their payments to the		104	
2	members that have put in money. I don't know how	2	481.	
3	that relates to a ponzi scheme. I mean, we can all	3		did you need to provide details for theyou know,
4	use our imagination on that, but the more timely	4		remarks, or details of what was being transferred?
5	they were with their payouts, the more traffic they	4 5		A. Sometimes. Often times we had,
6	received, the more referrals they received, and the	6		depending on what their companies were that we'd
	more money they would make. So, often times, they	7		send money to. They had various entities sent up
8	would say, "Oh, we have a rush payment to go out, or	8		globally. We'd often just have it embedded in the
9	a file to go out, that needs to go out now." And,	9		instructions already. So we had saved templates,
10		10		
	you know, we would try and do that for them.		100	where we just clicked a button and it could go out.
11	475. Q. So for the just going back to the	11	482.	
12	instructions then, if we couldI mean it may be	12		on the wire transfer receipts. Do you nowdo you
13	something that the Receiver's interested in seeing.	13		have some estimate of the volumes that you would
14	To the extent that Banners instructed Aramor to do	14		have done over the years?
15	something, with respect to wire transfer and receipt	15		A. Well it was really specifically a
16	into the CIBC account.	16		period of time between March 2012 to September 2012,
17	A. Right, yes.	17		October 2012. They pretty muchCIBC really shut
18	476. Q. Would those instructions have been	18		us down within a six or seven month period.
19	retained or destroyed?	19	483.	
20	A. I'm not going to say destroyed, but	20	1001	anyways, so thanks for that. Now apart from the
21	a lot of times it was verbal. And a lot of times it	21		credit card services, the payouts, the wire transfer
22	was very loosely communicated. So, unless it was	22		receipts. Was there another category of services
23		23		that you provided forthat Aramor provided
23	uploaded to us specifically, or it was emailed with	23		
25	an excel sheet, for example. Often times, you know,	25	484.	A. Directly? Qfor Banners?
20	they were so disorganized that wayit's been hard	173		
	Page 103		Page	105
	Page 103 M. Morgan - 103			105 M. Morgan - 105
1	M. Morgan - 103 M. Morgan - 103 enough for us to get statements to you that you	1	Page	¹⁰⁵ M. Morgan - 105 A. No.
1 2	M. Morgan - 103 M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over,	1 2		M. Morgan - 105 A. No. Q. Directly?
1	M. Morgan - 103 M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that	1 2 3	Page 485.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer.
1 2 3 4	M. Morgan - 103 M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that	1 2 3 4	Page 485.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer.
1 2 3	M. Morgan - 103 M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that you presented. You know, that took a lot of	1 2 3	Page 485.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else.
1 2 3 4 5 6	M. Morgan - 103 M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that you presented. You know, that took a lot of digging, because it's just all over the place.	1 2 3 4 5	Page 485. 486.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know
1 2 3 4 5 6	M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that you presented. You know, that took a lot of digging, because it's just all over the place. 477. Q. Sure.	1 2 3 4	Page 485. 486.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to
1 2 3 4 5 6 7	M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that you presented. You know, that took a lot of digging, because it's just all over the place. 477. Q. Sure. A. So, if, you know, if we searched our	1 2 3 4 5 6 7	Page 485. 486.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it.
1 2 3 4 5 6 7 8	M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that you presented. You know, that took a lot of digging, because it's just all over the place. 477. Q. Sure. A. So, if, you know, if we searched our email, we'd find certain things, but it was very	1 2 3 4 5 6 7 8	Page 485. 486.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly?
1 2 3 4 5 6 7 8 9	M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that you presented. You know, that took a lot of digging, because it's just all over the place. 477. Q. Sure. A. So, if, you know, if we searched our email, we'd find certain things, but it was very loose.	1 2 3 4 5 6 7 8 9	Page 485. 486.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes.
1 2 3 4 5 6 7 8 9 10	M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that you presented. You know, that took a lot of digging, because it's just all over the place. 477. Q. Sure. A. So, if, you know, if we searched our email, we'd find certain things, but it was very loose. 478. Q. Well, then okay. So I accept that.	1 2 3 4 5 6 7 8 9 10	Page 485. 486. 487.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation,
1 2 3 4 5 6 7 8 9 10 11	 M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that you presented. You know, that took a lot of digging, because it's just all over the place. 477. Q. Sure. A. So, if, you know, if we searched our email, we'd find certain things, but it was very loose. 478. Q. Well, then okay. So I accept that. But then when you, presumably, at some point, you 	1 2 3 4 5 6 7 8 9 10 11	Page 485. 486. 487.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey
1 2 3 4 5 6 7 8 9 10 11 12	 M. Morgan - 103 enough for us to get statements to you that you would show, like the excel sheet that we sent over, that would show, or sorry, list the payments that you presented. You know, that took a lot of digging, because it's just all over the place. 477. Q. Sure. A. So, if, you know, if we searched our email, we'd find certain things, but it was very loose. 478. Q. Well, then okay. So I accept that. But then when you, presumably, at some point, you would then go to CIBC, right? 	1 2 3 4 5 6 7 8 9 10 11 12	Page 485. 486. 487.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good
1 2 3 4 5 6 7 8 9 10 11 12 13	 Page 103	1 2 3 4 5 6 7 8 9 10 11 12 13	Page 485. 486. 487.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in
1 2 3 4 5 6 7 8 9 10 11 12 13 14	 Page 103	1 2 3 4 5 6 7 8 9 10 11 12 13 14	Page 485. 486. 487.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 5	 Page 103	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	Page 485. 486. 487. 488.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no. Q. So, and we're going to see it in the
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 14 5 6 7 8 9 10 11 12 10 10 11 10 10 10 10 10 10 10 10 10 10	 Page 103	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Page 485. 486. 487. 488.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no. Q. So, and we're going to see it in the emails and things. But was there a period of time
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 6 7	 Page 103	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Page 485. 486. 487. 488.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no. Q. So, and we're going to see it in the emails and things. But was there a period of time when one of the services you guys offered was to
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	 Page 103	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Page 485. 486. 487. 488.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no. Q. So, and we're going to see it in the emails and things. But was there a period of time when one of the services you guys offered was to take wire transfers, or money that came into Canada,
1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 10 11 12 10 10 11 10 10 10 10 10 10 10 10 10 10	 Page 103	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Page 485. 486. 487. 488.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no. Q. So, and we're going to see it in the emails and things. But was there a period of time when one of the services you guys offered was to take wire transfers, or money that came into Canada, and convert it into cash?
1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 10 11 12 10 10 11 10 10 10 10 10 10 10 10 10 10	 Page 103	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Page 485. 486. 487. 488.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no. Q. So, and we're going to see it in the emails and things. But was there a period of time when one of the services you guys offered was to take wire transfers, or money that came into Canada, and convert it into cash? A. No. What we did was, we would
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1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 12 21 2 21 2 21 2 21 2 21 2 21 2 21 2 21 2 21 2	 Page 103	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	Page 485. 486. 487. 488.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no. Q. So, and we're going to see it in the emails and things. But was there a period of time when one of the services you guys offered was to take wire transfers, or money that came into Canada, and convert it into cash? A. No. What we did was, we would sendwe'd get it and it would go to E-Cash, and E-Cash was the business that they had. We would
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 12 21 2 21 2 21 2 21 2 21 2 21 2 21 2 21 2 21 2	 Page 103	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Page 485. 486. 487. 488.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no. Q. So, and we're going to see it in the emails and things. But was there a period of time when one of the services you guys offered was to take wire transfers, or money that came into Canada, and convert it into cash? A. No. What we did was, we would sendwe'd get it and it would go to E-Cash, and
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1 2 3 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 14 5 16 1 1 1 1 12 1 1 1 1 1 1 1 1 1 1 1 1 1	 Page 103	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22 23	Page 485. 486. 487. 488.	M. Morgan - 105 A. No. Q. Directly? A. Prepaid cards, card funds transfer. Not directly, no. There was nothing else. Q. And indirectly, because I know there's a distinction in your mind, and I want to make sure that I understand it. A. Indirectly? Q. Yes. A. No, I mean. In casual conversation, you might advise them to do something, or say, hey you should watch out for this, or this is not a good idea. But nothing explicitly that would be in writing, or that we would have transacted, no. Q. So, and we're going to see it in the emails and things. But was there a period of time when one of the services you guys offered was to take wire transfers, or money that came into Canada, and convert it into cash? A. No. What we did was, we would sendwe'd get it and it would go to E-Cash, and E-Cash was the business that they had. We would notwe'd ask them to send directly to E-Cash,

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	Sheet 28 Page 106		Page 108
	M. Morgan - 106		M. Morgan - 108
11	money and have it converted into cash.	1	might have happened a couple times. We did that
2	489. Q. So, I mean, I have heard of Western	2	because we were already holding the cash. They said
3			
	Union and companies like that, that you see on Yonge		we need this money out immediately, so we'd send the
4	Street. But what is E-Cash?	4 5	money.
5	A. E-Cash is justyou know, if you		497. Q. So you were holding the cash? You
6	have large amounts of money that you want to	6	mean you had monies
7	transact. They're still a money service business,	7	A. This is from the wires that came in.
8	they're still licensed, but you know, they're	8	498. Q. Right, so you had moniesyou had
9	goingthey enable guys who want to have 300,	9	wire transfer proceeds in your CIBC account, and on
10	400,000 on them in cash. They enable those guys to	10	Chris' instruction you'd send to E-Cash?
11	go and pick up money. You can't do that with	11	A. Correct. correct.
12	Western Union. I mean, not that you can't, but	12	499. Q. And then, presumably, you'd tell
13	their reporting elements are clightly different and	13	
	their reporting elements are slightly different, and		them where to go to pick up
14	the KYC is different.	14	A. Correct.
15	490. Q. So is E-Cash PCI compliant?	15	500. Qthe cash?
16	A. I do not know. They'll probably	16	A. Yes.
17	tell you they are. They're a very dishonest group,	17	501. Q. And you did that with Smith? Did
18	actually.	18	you do it with Dixit or Josun?
19	491. Q. And whodid Aramor have an account	19	A. Josun, no. Dixit, no. Smith is the
20	at E-Cash, or did	20	only one we never dealt with, when it came to money.
21	A. No, we never had an account at	21	502. Q. Money, meaning cash money?
22	E-Cash. E-Cash would simply provide instructions as	22	A. Cash money. With Dixit, any
23	to where money should be sent. We'd tell the	23	instructions we got from him was for payroll. I
24	client, it's kind of buyer beware. It's at your own	24	think he managed some elements of that, at very
25	risk. If you send money to them, and they can get	25	specific times in the company. But Chris held
	Page 107		Page 109
	M. Morgan - 107		M. Morgan - 109
1	you the cash, great. If not, that cash is gone.	1	everything. It was Chris 100 percent on holding
		2	money, telling us where money would go. Even though
2	Chris did send money prior, that he picked up, and	$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	the company had grown, and they had a lot of
3	there was money he never received at times. He	10	
4	never seemed too concerned. There was also money		and they had grown, and they had a lot of
		4	employees, Chris kept a pretty tight fist on that.
5	seized. He had money in his car one night, and he	5	employees, Chris kept a pretty tight fist on that. As far as cash going out, I have known Chris to buy
56	seized. He had money in his car one night, and he stopped at a stop light, and the cops took the money		employees, Chris kept a pretty tight fist on that. As far as cash going out, I have known Chris to buy cars and watches, and different things for people,
5 6 7	seized. He had money in his car one night, and he stopped at a stop light, and the cops took the money and put it into evidence, but he wasn't charged with	5 6 7	employees, Chris kept a pretty tight fist on that. As far as cash going out, I have known Chris to buy cars and watches, and different things for people, and his staff. But, he would have the money and
5 6 7	seized. He had money in his car one night, and he stopped at a stop light, and the cops took the money	5 6 7 8	employees, Chris kept a pretty tight fist on that. As far as cash going out, I have known Chris to buy cars and watches, and different things for people, and his staff. But, he would have the money and hand it out. So Chris would always pick up money
5 6 7 8 9	seized. He had money in his car one night, and he stopped at a stop light, and the cops took the money and put it into evidence, but he wasn't charged with	5 6 7 8 9	employees, Chris kept a pretty tight fist on that. As far as cash going out, I have known Chris to buy cars and watches, and different things for people, and his staff. But, he would have the money and hand it out. So Chris would always pick up money and do what he needed to do with it.
5 6 7 8 9 10	seized. He had money in his car one night, and he stopped at a stop light, and the cops took the money and put it into evidence, but he wasn't charged with anything. But when you have that much cash on you,	5 6 7 8 9 10	employees, Chris kept a pretty tight fist on that. As far as cash going out, I have known Chris to buy cars and watches, and different things for people, and his staff. But, he would have the money and hand it out. So Chris would always pick up money and do what he needed to do with it. 503. Q. Okay.
5 6 7 8 9	 seized. He had money in his car one night, and he stopped at a stop light, and the cops took the money and put it into evidence, but he wasn't charged with anything. But when you have that much cash on you, it's suspicious. 492. Q. No, I appreciate that. But I mean 	5 6 7 8 9	employees, Chris kept a pretty tight fist on that. As far as cash going out, I have known Chris to buy cars and watches, and different things for people, and his staff. But, he would have the money and hand it out. So Chris would always pick up money and do what he needed to do with it.
5 6 7 8 9 10 11	 seized. He had money in his car one night, and he stopped at a stop light, and the cops took the money and put it into evidence, but he wasn't charged with anything. But when you have that much cash on you, it's suspicious. 492. Q. No, I appreciate that. But I mean whatI just want to understand what Aramor's role 	5 6 7 8 9 10	 employees, Chris kept a pretty tight fist on that. As far as cash going out, I have known Chris to buy cars and watches, and different things for people, and his staff. But, he would have the money and hand it out. So Chris would always pick up money and do what he needed to do with it. 503. Q. Okay. A. It's not knowledge that I wanted to
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4	Sheet 29 Page 110	Page 112
11	M. Morgan - 110	M. Morgan - 112
	A. Not to cash, no. In Canada, no.	1 that you could stick them to. They would set up
2	And in India.	2 these things overnight, and they could disappear
3	508. Q. We'll look at India in a minute, but	2 these things overnight, and they could disappear 3 overnight. There was already furniture there, et
4	just in Canada?	
5	A. In Canada, no, just E-Cash. E-Cash	 4 cetera, they could walk away from it. 5 519. Q. Okay. In terms ofhow many 6 instances were. Were there just a few, or were 7 there many instances where Chris would helpor you
6	operates under a lot of different names, but that's	6 instances were. Were there just a few, or were
7	the name we know them as.	7 there many instances where Chris would helpor you
8	509. Q. Okay, and just so we know, what are	8 wouldthrough introduction or otherwise,
9	some of the other names that E-Cashthat were used	9 facilitate the conversion of money into cash?
10	by E-Cash?	10 A. The total I know of, would probably
11	A. I wouldn't know off the top of my	11 bewithin Canada?
12	head, but you can request that information.	12 520. Q. Yes.
13	510. Q. Okay. Where would we find E-Cash,	13 A. He probably asked about four times.
14	by the way.	14 Four or five times.
15	A. They're in Montreal, but the main	15 521, Q. Four or five times?
16	principal actually lives in Europe now. He doesn't	16 A. Yes.
17	really come into Canada as much.	17 522. Q. So there weren't too, weren't too
18	511. Q. Was he the person that you dealt	18 many?
19	with?	19 A. There weren't too many. He asked
20	A. Yes.	20 four or five times. He said Max, do you know how l
21	512. Q. And what was his name?	21 can get that kind of cash in Canada. I said yes,
22	A. It was Nana Whyte, N-A-N-A White,	22 there's probably a few guys that can do it. But, I
23	and Kingsley Whyte. I believe that they're the same	23 can only make the introduction, and then from
24	person.	24 thereyou know.
25	513. Q. W-H-I-T-E?	25 523. Q. Right.
	Page 111	Page 113
	M. Morgan - 111	II M. Morgan - 113
1 4		
1	A. W-H-Y-T-E.	A. If it comes, it comes, if it
1 2	A. W-H-Y-T-E. 514. Q. And, and	A. If it comes, it comes, if it doesn't, it doesn't.
3	A. W-H-Y-T-E. 514. Q. And, and A. Or it could be W-H-I-T-E. I'm not	1A.If it comes, it comes, if it2doesn't, it doesn't.3524.Q.Right.But I mean, in fairness,
3	A. W-H-Y-T-E. 514. Q. And, and A. Or it could be W-H-I-T-E. I'm not sure. But if you do a Google search, you'll see	1A.If it comes, it comes, if it2doesn't, it doesn't.3524.Q.4because I don't want to surprise you.
345	A. W-H-Y-T-E. 514. Q. And, and A. Or it could be W-H-I-T-E. I'm not sure. But if you do a Google search, you'll see that Kingsley Whyte was charged with petty theft	1 A. If it comes, it comes, if it 2 doesn't, it doesn't. 3 524. Q. 4 because I don't want to surprise you. There are 5 some emails where we've seen, where you're telling
3456	A. W-H-Y-T-E. 514. Q. And, and A. Or it could be W-H-I-T-E. I'm not sure. But if you do a Google search, you'll see that Kingsley Whyte was charged with petty theft under 5,000 or something. He'sthey've had some	1 A. If it comes, it comes, if it 2 doesn't, it doesn't. 3 524. Q. Right. But I mean, in fairness, 4 because I don't want to surprise you. There are 5 some emails where we've seen, where you're telling 6 him where to go to pick up the cash
3 4 5 6 7	A. W-H-Y-T-E. 514. Q. And, and A. Or it could be W-H-I-T-E. I'm not sure. But if you do a Google search, you'll see that Kingsley Whyte was charged with petty theft under 5,000 or something. He'sthey've had some fraud cases. None that have stuck. Canada's pretty	1A.If it comes, it comes, if it2doesn't, it doesn't.3524.Q.4because I don't want to surprise you.5some emails where we've seen, where you're telling6him where to go to pick up the cash7A.Yes.
3 4 5 6 7 8	A. W-H-Y-T-E. 514. Q. And, and A. Or it could be W-H-I-T-E. I'm not sure. But if you do a Google search, you'll see that Kingsley Whyte was charged with petty theft under 5,000 or something. He'sthey've had some fraud cases. None that have stuck. Canada's pretty light on white collar crime.	1 A. If it comes, it comes, if it 2 doesn't, it doesn't. 3 524. Q. Right. But I mean, in fairness, 4 because I don't want to surprise you. There are 5 some emails where we've seen, where you're telling 6 him where to go to pick up the cash 7 A. Yes. 8 525. Qand stuff. So given that there
3 4 5 6 7 8 9	 A. W-H-Y-T-E. 514. Q. And, and A. Or it could be W-H-I-T-E. I'm not sure. But if you do a Google search, you'll see that Kingsley Whyte was charged with petty theft under 5,000 or something. He'sthey've had some fraud cases. None that have stuck. Canada's pretty light on white collar crime. 515. Q. Right. 	1 A. If it comes, it comes, if it 2 doesn't, it doesn't. 3 524. Q. Right. But I mean, in fairness, 4 because I don't want to surprise you. There are 5 some emails where we've seen, where you're telling 6 him where to go to pick up the cash 7 A. Yes. 8 525. Qand stuff. So given that there 9 were only four or so instances, what werewhy
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1 that you 2 A. Not really, I mean, you 3 Knowhaving grown uw wherel grew up, you know, 4 he's not ahe wasn't like a drug dealer, or 5 anything. He'ssome gurs just like hewing a lot 6 of cash on them, to buy things cash. You know. 7 that's how means, you know If he wadk of to a 8 store, and sees a Poles, that he wants to buy. He 9 doesn't hasn't hat a card. So, buy the 10 iffield to pay out cash bonuses to staff, and members 11 of his team. That's kind of how he was 12 Sol. O. 13 C. Duy intervinces 14 A. Yes. 15 Soll. O. Duy intervinces 14 A. Yes. 15 Soll. O. Duy intervinces 16 store, about being pulled over at are light. Hat ore of the enals will refers 16 Yes. Prover intervinces Hat ore of the enals will have been at the based for cash. You 17 saked them will have you not cash. And. Hatore was athined 18 <td></td> <td></td> <td></td> <td></td>				
2 ^A A. Not really. I mean, you ^B so 280 went missing. There was the ¹⁰⁰ in the car? 3 ^A B. Not really. I mean, you ^A A. Most really. I mean, you 4 ^A B. Not really. I mean, you ^A A. Yes. 5 ^A A. Not really. I mean, you ^A A. Yes. 6 ^A C. So 280 went missing. There was the 100 in the car? ^A A. Yes. 9 ^A A. So, the wash to buy. He ^A A. Then ouse the amounts, butand 10 ^{III kear. ^AA. More was, you know. If he washee into a 10 ^{III kear. ^AA. More was, you know. If he washee into a 10 ^{III kear. ^AA. More was. 10 ^{III kear. ^{III kear. 11 ^AA. 12 ^AA. ^AA. 12 ^AA. ^AA. 12 ^AA. 13 ^AA.}}}}}	1		1	
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	Sheet 31 Page 118	Page 120
	M. Morgan - 118	M. Morgan - 120
1	549. Q are the three or four, with the	1 EXAMINATION BY MS. GOLDBLATT:
2	amounts ranging between 60 and 70, at the low end,	2 561. Q. So, the first question I wanted
3	to 350 to 400 at the high end?	3 toyou provided a summary of receipts from a bank
4	A. That's correct.	4 account from CIBC account no. , ending in
5	550. Q. And would there be anyI mean we have some emails between yourself and Smith talking	5 A. Okay. 6 562. Q. Which is a US operating account?
	about those.	6 562. Q. Which is a US operating account? 7 A. Sure.
8	A. Sure.	8 563. Q. The account is under your name,
9	551. Q. Apart from the emails, would there	9 Maxwell Morgan?
10	be any other records that you can think of, in terms	10 A. M [*] hmm.
11	of	11 564. Q. The other two accounts provided,
12	A. No. There wasn't really a paper	12 which are CIBC and L, and CIBC are in the
13	trail. I think he only had to show I.D. when he	13 name of Aramor Payments?
14 15	went to pick them up. 552. Q. Right.	A. The accountthe initial one that you're speaking of under my name, it's under Aramor
16	A. And then that was it.	16 Payments too. I believe that when the bank, when I
17	553. Q. Right.	17 requested it, they probably put my name on it.
18	A. Yes.	18 Maybe the statements were waiting for me at the
19	554. Q. How wouldhow does someone manage	19 branch. But all of them are under 1587803 Ontario
20	that much amount	20 Limited.
21	A. Money?	21 565. Q. Okay.
22 23	555. Q. Yes. MR. COHEN: Don't answer that question.	22 A. For the record. 23 566. Q. And when you provided that summary
23	THE DEPONENT: Okay. I wish I knew. I	24 of receipts for us, how were you able to identify
25	don't know.	25 which transactions related to Banners Brokers, and
L		
<u> </u>	Page 119	Page 121 Page 121
	M. Morgan - 119	M. Morgan - 121
1	M. Morgan - 119 MR. COHEN: Don't answer the question.	M. Morgan - 121 1 which ones related to some of your other clients?
1	M. Morgan - 119 MR. COHEN: Don't answer the question. THE DEPONENT: Okay.	M. Morgan - 121 1 which ones related to some of your other clients? 2 A. Sure. We know that Monetize Group
1 2 3	M. Morgan - 119 MR. COHEN: Don't answer the question.	M. Morgan - 121 1 which ones related to some of your other clients? 2 A. Sure. We know that Monetize Group 3 was Banners Brokers related. Chris had stated that.
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1 2 3 4 5	M. Morgan - 119 MR. COHEN: Don't answer the question. THE DEPONENT: Okay. 556. MR. WARD: All right. BY MR. WARD:	M. Morgan - 121 which ones related to some of your other clients? A. Sure. We know that Monetize Group was Banners Brokers related. Chris had stated that. 5 A. We know that anything that says
1 2 3 4 5 6 7	M. Morgan - 119 MR. COHEN: Don't answer the question. THE DEPONENT: Okay. 556. MR. WARD: All right. BY MR. WARD: 557. Q. So, I'm just thinking in terms of the available time that we've got left, I didn't get	M. Morgan - 121 which ones related to some of your other clients? A. Sure. We know that Monetize Group was Banners Brokers related. Chris had stated that. 567. Q. Okay. 5 A. We know that anything that says 6 Banners Broker is Banners Broker. We also know that 7 individual wires that came in were not from anywhere
1 2 3 4 5 6 7 8	M. Morgan - 119 MR. COHEN: Don't answer the question. THE DEPONENT: Okay. 556. MR. WARD: All right. BY MR. WARD: 557. Q. So, I'm just thinking in terms of the available time that we've got left, I didn't get as far into this document book as I'd like, but, I	M. Morgan - 121 which ones related to some of your other clients? A. Sure. We know that Monetize Group was Banners Brokers related. Chris had stated that. 567. Q. Okay. 5 A. We know that anything that says 6 Banners Broker is Banners Broker. We also know that 7 individual wires that came in were not from anywhere 8 else, because we never had clients send individual
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1 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 13 14 5 15 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	M. Morgan - 119 MR. COHEN: Don't answer the question. THE DEPONENT: Okay. 556. MR. WARD: All right. BY MR. WARD: 557. Q. So, I'm just thinking in terms of the available time that we've got left, I didn't get as far into this document book as I'd like, but, I know the Receiver has some financial records related questions A. Sure. 558. Qbecause it will helpthey can then go back to their office and make requests of people, and pursue their own full of funds analysis. So Gillian and Phil, did you guysdo you want to use the next hour to start to cover some of the questions on your memo? MS. GOLDBLATT: That would be great. 559. MR. WARD: Yes. THE DEPONENT: Okay.	M. Morgan - 121 which ones related to some of your other clients? A. Sure. We know that Monetize Group was Banners Brokers related. Chris had stated that. 567. Q. Okay. A. We know that anything that says Banners Broker is Banners Broker. We also know that individual wires that came in were not from anywhere else, because we never had clients send individual wires. So, unless it was me funding our own accounts, through my own pocket, oryou know, we rarely ever had instances where an individual would wire our accounts. That was only done for Banners Broker, so that's how we knew it was theirs. 568. Q. So, you pretty much went through the statements yourself, line by line, and determined if any of those A. Yes. 569. Qidentifying factors showed up? A. I asked my, sure. I asked my back office to look at it, and for those specific
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	Sheet 32 Page 122 M. Morgan - 122		M. Morgan - 124
1	A. I did. Is it possible, yes. Is it	1	gone through that function? I'm not holding you to
2			the number, but
3	likely, no.		
	571. Q. When you're going to be preparing,	11 .	A. I know it was seven figures.
4	hopefully this disbursement summary, in the same	4	581. Q. Seven, was it?
5	vein as the receipt summary, would you go through	5	A. My guess is, maybe a little over a
6	the same process for that? How would you be able to	6	million. But, I'm not a 100 percent sure on that.
7	determine that disbursement summary?	7	582. Q. Then you've got the ACH payments?
8	A. I don't know. We would try our	8	A. Yes. I don't have any figures on
9	best. I don't know what's there and what we can	9	that, mainly because that would have went through
10	piece together. But we would certainly make this	10	introductions that we gave. And they were not too
11	is obviously depending on my counsel's advice.	11	big on doing a lot of stuff in the US, just based on
12	572. Q. So, the account number 199 , which	12	the fact that compliance is heavier there. And to
13	seems likeit's where the majority, I guess, from	13	be brought to task in the US is a lot different than
14	your comments earlier, would have been electronic	14	
14			being brought to task anywhere else.
15	fund transfers and wire transfers, most likely	15	583. Q. But to confirm, that would have gone
16	through that account? The EFTs and the wire	16	through the payment processors directly
17	transfers?	17	A. Correct, that was not through us
18	A. No, the EFTs were actually a	18	584. Qnot through Aramor?
19 20	different company entirely.	19	A. That's correct.
20	573. Q. Oh okay. What account would those	20	585. Q. And then the last component of the
21	have been going into?	21	payouts were the credit card payments, which you
22	A. Bank of Montreal, it was a Canadian	22	talked aboutis it Annex, can I get the spelling
23	account, throughout of Vancouver.	23	of that?
24	574. Q. Right. So this was	24	A. Affiliate Wallet? Allied Wallet,
25	primarily wire transfers?	25	sorry?
	Page 123		Page 125
	Page 123 M. Morgan - 123		Page 125 M. Morgan - 125
	M. Morgan - 123		M. Morgan - 125
1	M. Morgan - 123 A. Yes.	1	M. Morgan - 125 586. Q. No, not Allied Wallet.
1	M. Morgan - 123 A. Yes. 575. Q. Is that correct?	1	M. Morgan - 125 586. Q. No, not Allied Wallet. 587. MR. WARD: NX
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	Sheet 33 Page 126	Page 128
	M. Morgan - 126	M. Morgan - 128
1	BY MS. GOLDBLATT:	1 607. Q. When you say "he," you're referring
2	594. Q. So, it appears from this. Does this	2 to 3 A. Chris.
3	document look familiar to you? This email?	
4	MR. COHEN: It's January 12 of 2012.	4 608. Q. You're referring to Smith, okay. 5 A. And Banners Broker. So, I'm
5	The one you're talking about? 595. MS. GOLDBLATT: Yes, sorry, did I say	5 A. And Banners Broker. So, I'm 6 assuming it has to do with that. It always had to
	2014, I meant 2012.	7 do with that, if he wasyou know, if a lot of
8	THE DEPONENT: "We will see what	8 funds were coming to us, so that would be my only
9	happens today and tomorrow with this	9 assumption there.
10	wire"?	10 609. Q. Ok, so you don't seem to have a
11	596. MS. GOLDBLATT: Yes.	11 specific recollection of this transaction?
12		12 A. No, because they were not very good
13	BY MS. GOLDBLATT:	13 at uploading, as per our instructions. It was a lot
14 15	597. Q. And so, if you keep reading. A. Is there more?	14 of emails back and forth, or phone calls, or 15 messages, or text messages, different things, about
16	598. Q. Yes. If you go right to the	16 immediate things, I need this to hit here, now, I
17	beginning, your first line	17 need this, I need that. So
18	MR. COHEN: Just hold on a sec.	18 610. Q. M'hmm.
19	152we're reading backwards	19 A. My assumption was that that's what
20	chronologically, right.	20 that was referencing. One of those activities.
21	599. MS. GÖLDBLAŤT: Yes.	21 611. Q. So, if you go toif you flip to
22 23	MR. COHEN: Is that what you want to? 600. MS. GOLDBLATT: That's right.	22 page three of this email chain. Chris Smith has 23 sent an email to Martina, who is at the bank, I
24	MR. COHEN: That's what you want to do?	 sent an email to Martina, who is at the bank, I believe. And it appears that he is attempting to
25	601. MS. GOLDBLATT: You can read from back	25 help Kuldip Josun with a specific transaction?
L		
	Page 127	
	M. Morgan - 127	M. Morgan - 129
1	M. Morgan - 127 to front, if it's easier, but yes, it's in	M. Morgan - 129 M. Morgan - 129 MR. COHEN: This is January 11, 2012, at
1	M. Morgan - 127 to front, if it's easier, but yes, it's in the binder. It's latest to earliest.	M. Morgan - 129 MR. COHEN: This is January 11, 2012, at 2 19:17 hours?
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	. Sheet 34 Page 130		Pac	qe 132
	M. Morgan - 130		-	M. Morgan - 132
1	616. Q. Were there any other			BY MS. GOLDBLATT:
2	transactionsdo you remember any other times m	oney	2 62 3	521. Q. So the bank account in question, in
3			3	the email, what is this account? Are you aware of
4	A. No. Being in the industry that I'm		4 5 6	this account?
5	in, and you know, and I'd facilitate introductions,		5	A. I'm not. If it doesn't have the
6			6	account number there, I'm not aware. I mean,
	cash, as mentioned, or even if they needed to set u		7	supposedly it might be in the statements, but I'm
8	offshore accounts. I'd say, okay, well I know a		8 9 62	not sure.
10	banker that can do that, or I know a service that can do this, to remove that from me. Because I'm	1		S22. Q. Are you aware of any Swiss bank accounts held by Kuldip Josun or with this bank?
11	not in that field.	1		A. No, I'm not.
12	617. Q. Okay.			23. Q. The next email, was an email from
13	A. I'm sure they took advantage of the	1		yourself to Smith on September 25, 2013. So we're
14	suggestions that I made. And I wasn't really	i		just going to locate that in the document brief.
15	involved in their personal cash distributions, for	1	5	SorryI think it's tab 61.
16	the most part.	1		MR. COHEN: Counsel, are you aware of
17	618. Q. Okay, so let's talk about that for a	1		any Swiss bank accounts or offshore
18	minute. Do youwhat offshoredo you remember			accounts that are actually utilized by
19	any of the offshore banks that you recommended to) 1	9	these people?
20	them?	2	0 62	24. MR. WARD: Are we aware of one?
21	MR. COHEN: Hold it, let her finish the	2	1	MR. COHEN: Are you aware of whether or
22		2	2	not money has been secreted in any offshore
23 24	THE DEPONENT: Sure.	2		accounts? Any Swiss bank accounts? 25. MR. WARD: We believe so.
24	MR. COHEN: Can you articulate it clearly so that I can hear it?	2	4 02 5 62	26. MS. GOLDBLATT: So tab 61?
20			<u> </u>	
	Bage 121		Dag	~~ 122
	Page 131 M Morgan - 131		_ Pag	ge 133 M Morgan - 133
1	M. Morgan - 131		_ Pag 1	M. Morgan - 133
1 2	M. Morgan - 131 619. MS. GOLDBLATT: Absolutely. I'm just		1	M. Morgan - 133 MR. COHEN: Just hold on a second. I
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	Sheet 35 Page 134		Page 136
	M. Morgan - 134		M. Morgan - 136
1	looking at you.	1	634. Qand that is what we will look at
2	MR. WARD: Right, so	2	it. You can see that I've highlighted and summed
3	MR. COHEN: But I want an answer.	3	up, and I'll just highlight it again. There was
4	MR. WARD: So what	4	about 1.17 million dollars.
56	MR. COHEN: I want to know if those questions came from specific information?	4 5 6	A. Okay. 635. Q. That was transferred from Stellar
7	MR. WARD: I don't understand the		Point directly to anit's noted in the bank
8	question.	8	statements as an Aramor account, the numbered
9	MR. COHEN: I wantthe question is,	9	company, between March 2012 and September 2012?
10	whether the questions that put to my client	10	A. Ó Okay.
11	are grounded in information that these	11	636. Q. And so, my question to you, was why
12	people actually have money in Swiss	12	would Stellar Point have been sending these
13 14	accounts, or offshore accounts?	13	transactional amounts to Aramor? For what purpose?
15	MR. WARD: Well the email suggests that there was transfers to Swiss accounts.	115	A. My guess is to disburse funds for them.
16	Right, and we're trying to identify	16	MR. COHEN: Don't guess. Make a
17	MR. COHEN: Is that the basis of the	17	statement, one way or the other, don't
18	question?	18	guess.
19	MR. WARD: Yes, and so we're trying to	19	THE DEPONENT: It would be to move
20	identify Banners Broker money in the Swiss	20	theto disburse funds on their behalf to
21	accounts, but I think the probably more efficient exercise is for Gillian to focus	21	their affiliates globally.
22 23	on the bank statements.	23	BY MS. GOLDBLATT:
24	628. MS. GOLDBLATT: Okay.	24	637. Q. So the way that it would work, they
25	MR. WARD: And then, when I finish off	25	would send lump sum amounts to you, and you would
	Page 135		Page 137
4	M. Morgan - 135		M. Morgan - 137
1	this book, I'll look at the emails,	1	M. Morgan - 137 disburse it based on information provided by them,
1 2 3	this book, I'll look at the emails, Gillian.	1 2 3	M. Morgan - 137 disburse it based on information provided by them, or how did that process work?
1 2 3 4	this book, I'll look at the emails, Gillian. 629. MS. GOLDBLATT: Okay, sure.	3	M. Morgan - 137 disburse it based on information provided by them, or how did that process work? A. Yes, that would be accurate. So,
1 2 3 4 5	this book, I'll look at the emails, Gillian. 629. MS. GOLDBLATT: Okay, sure. MR. WARD: Okay. So you can pretty much	1 2 3 4 5	M. Morgan - 137 disburse it based on information provided by them, or how did that process work?
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S	heet 36 Page 138	Page 140
1 2 3 4 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22 23 24 25	M. Morgan - 138 them, or their affiliates to go to whatever instructions they gave us. So, on those specific transfers, money was transferred over, as requested. Stellar Point and Banners Broker, we didn't necessarily know the affiliation during this time. We knew we were receiving funds from some of their affiliates, some which were companies, and some which were individuals. And we knew we were sending money back to some of their affiliates, as well as vendors, as well as some of their own companies. We followed whatever instructions were given. 641. Q. So just to follow up on that statement, could you repeatwas there a connection between Stellar Point and Banners Brokers when you were transacting with Stellar Point? A. Not that we knew of at the time. Did we find out that later? Yes, and not necessarily that they were deceiving us in any way. It just wasn't transparent to us at the time that it took place. 642. Q. So who would have been sending you the instructions for the Stellar Point accounts, then? A. For Stellar Point, it would have been Rajiv Dixit, who was the owner of Stellar	M. Morgan - 140 ones did Stellar Point specifically use? Was it prepaid cards, E-cash, credit cards, ACH? Which ones were you using on behalf of Stellar Point? A. I don't know. Everything for us was on behalf of Banners Broker, so I don't know what Stellar Point did individually, or separately. 7 647. Q. Okay, so we're going to go account number million number million and the statements are in a separate 9 book, I believe. It's in the small one as well. 10 MR. COHEN: This one? 11 648. MS. GOLDBLATT: 14 649. Q. So these statements end at the end of 2012. I'm assuming that was because the account was then shut down? A. That's correct. 18 650. Q. Late 2012? 19 A. Yes. 20 651. Q. Large deposits were received daily 21 from FIRMA Foreign Exchange? 22 A. Yes. 23 652. Q. What services did Firma specifically
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	M. Morgan - 139 Point. Often times, it was still Chris Smith, though. 643. Q. For Stellar Point? A. For Stellar Point at times, yes. Later on, but initially it was Rajiv for Stellar Point. 644. Q. Okay, and at what point did that relationship end, with Stellar Point specifically? A. It didn't last very long. They only had a few transfers to us, from what I remember. I can't give you exact dates, but you know, it just kind of appeared as if they had other entities set up for the movement of funds. To me, it was all one and the same, Banners Broker. 645. Q. Was it A. I know that they've saidI think so. I don't know. I know that they since filed bankruptcy. You know, I think they just tried to set things up differently, and I'm assuming some of it was for tax purposes, I'm not sure. That would be something you'd have to ask them as to why. I can only speculate on what's here. 646. Q. So the collection of money on behalf of Stellar Point, of the six different ways that payments were processed. Which one of themwhich	Page 141 M. Morgan - 141 1 provide to Aramor? What was the nature of their 2 business? 3 A. Foreign exchange. So we have our 4 settlements, and we have client disbursements that 5 come to us in Euros largely. They offer better 6 rates than the banks, so we used Firma. 7 654. Q. So, for the conversion of Euros to 8 US dollars? 9 A. That's correct. 10 655. Q. Okay, and did Banners Broker utilize 11 that service? 12 A. They did not. They transacted only 13 in USD with us. 14 656. Q. There are alsoa lot of 15 disbursements to account ? 16 A. Is that a US account? 17 A. It's underyou know what, it's not 18 clear. It's called Comm Cash debit? 19 MR. COHEN: Where is it. 20 657. MS. GOLDBLATT: It's if you 21 THE DEPONENT: Oh Comm Cash debit 22 WR. COHEN: Hold on, hold on. 23 Q. Tab o

Loss market

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	Sheet	t 37 Page 142		Page 144	
	brice	M. Morgan - 142		rage 111	M. Morgan - 144
1		first transaction. You know, that's a small amount.	1		gave you, plus the ones you have identified
2		There's numerous throughout. It's all called Comm	2		under the other operating companies, is
23		Cash 99322. What is that account, and what does it	23		what it is. These others are other clients
4		do?			that are not based in Canada, and not doing
5		A. I think that's an internal reference	45		the same activities as Banners Broker.
				CCE	
6 7		from CIBC. I don't know what it refers to, but I	67	665.	MR. WARD: Okay, just hold on a sec.
		think it'sI don't want to say it's fees, it could			I'm not going to interrupt Gillian, because
8	050	be a transfer, I'm not sure exactly.	8		she knows this area better than I do. Just
9	659		9		to finish on this point, if you look at
10		A. Comm Cash, I remember it being CIBC	10		page two of the same production, production
11		reference.	11		one, you'll see numerous debits, right, to
12	660		12		Comm CashComm Cash debit, and then
13		disbursements under January 4th, which is the middle	13		there's this account number
14		of that first page?	14		MR. COHEN: Yes.
15		A. M'hmm.	15		MR. WARD:that keeps being repeated.
16	661.	. Q. And you see a large number of	16		MR. COHEN: It's all the same number
17		disbursements going to this Comm Cash account.	17		too.
18		Would the account number be that 44ending in	18		MR. WARD: Right, so these are
19		? Is that then a CIBC account you're saying,	19		the CIBC statements that Mr.
20		that that's being disbursed to?	20		Morgan provided, and I guess
21		A. It's possible, I'd have to look into	21		THE DEPONENT: Yes.
22		this deeper though	22		MR. WARD:what we need is an
23	662.		23		undertaking to let us knowifand I
24	002.	significant amount of disbursements going to this	24		appreciate you may not be able to tell
		Comm Cash account and we're looking for the account			
25		Comm Cash account, and we're looking for the account	25	Dogo 145	US
25	Page	Comm Cash account, and we're looking for the account	25	Page 145	US
25	Page	Comm Cash account, and we're looking for the account	25	Page 145	us M. Morgan - 145
25 1	Page	Comm Cash account, and we're looking for the account 143 M. Morgan - 143 holder, the name of where these disbursements were	25	Page 145	M. Morgan - 145 THE DEPONENT: Sure.
25 1 2	Page	Comm Cash account, and we're looking for the account	25 1 2	Page 145	M. Morgan - 145 THE DEPONENT: Sure. MR. WARD:right now.
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1 2 3 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 22 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 14 5 16 17 10 10 11 12 10 10 11 12 10 11 12 10 10 11 12 11 12 11 12 11 11 11 11 11 11 11	M. Morgan - 146 and find out U/A MR. WARD: Okay. MR. COHEN:what the situation is. MR. WARD: Okay. MR. COHEN: Whatdo you have an idea ofdo you have a theory of what these transfers are for? MR. WARD: No, but we have some confidence that they relate to Banners Broker, because this is the Banners account, through which Banners Broker operated. MR. COHEN: When you say "this is the account, " are you referring to this account ending in MR. WARD: Yes. Yes, this is one of the four CIBC accounts that Max had. That received Banners Brokers monies. THE DEPONENT: I can tell you what it is. MR. COHEN: Oh, I see. That received Banner Broker monies. THE DEPONENT: All of our funds were received into this account. We had cheques written off the other US account. The	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 3 24 25	 A. That is correct. 667. Q. Okay. A. Which should show cheques clearing from that account daily. 668. Q. So what's interesting, and I'm looking at those statements right now A. Okay. 669. Qwhich are in another binder for you. If I go to January 4th. A. M'hmm. 670. Q. You know, and I see a 115,000 being disbursed to this account. If I don't see it in statements
L	Miller of the offeet of account. The Page 147 M. Morgan - 147 funds that where it says Comm Cash, or it says a transfer, of some sort, it would be transferring funds, or exchanging funds into Canadian dollars or be transferring into the other US dollar account that would allow for the cheques to be disbursed out. So at any given time, if we had 300,000 this week going out in cheques, we'd transfer from this primary account into the other one, where the cheques were written off of. MR. WARD: Okay. THE DEPONENT: So those are the Comm Cash debits. And the transfers would reference some of that as well. There's no relation to Banners Broker. I've given you everything on Banners Broker already. Our larger clients do disbursements daily, and they do huge volumes, and 2012 references that in these statements, which is why I was transparent, because most of our statements have to do with our other clients, and not Banners. BY MS. GOLDBLATT:		 Page 149 M. Morgan - 149 673. Q. Right, so I should be able to see then, that total of 115, in a single line item. A. I suppose so. I haven't forensically audited these accounts, but that's what should be there. 674. Q. And if it's not, you're saying it possibly went to the Canadian account? A. That's a possibility as well, because we did cheques off the Canadian account as well. So we'd have clients wiring to the US, and we'd transfer over into Canadian. That's a possibility. 675. Q. And the Canadian account, is that the account ending in? A. Yes. 676. Q. The Canadian one? A. There's also oneyes. I think so. There's one other, I believe, that had to do with just chequesso it wouldn't beno, it wouldn't be It would be another account that we had. 677. Q. Would it be an account ending in , as is indicated in the statements? A. That's certainly possible. I don't have them memorized, but it's possible. 678. Q. That would make the most sense,

Sheet 39 Page 150 ____ Page 152 M. Morgan - 150 M. Morgan - 152 given that's the account referenced. It says to that, and we started making sure whatever we did 1 1 2 2 That appears to be an account number? was...CRA compliance was a big deal for us, so we 3 3 ceased to do any sort of transactions through our A. That's possible. MR. WARD: So I think maybe the solution Canadian company after 2012. 4 5 6 4 5 6 7 to this is, if my under advisement that I 688. Q. And what would the nature of those received from Howard still stands, this disbursements to your BMO account have been? Would 7 just seems to be the one account that we're they have been commission payments with respect 8 8 missina to... 9 9 MS. GOLDBLATT: Yes. 679. A. Most likely. We held cash in there, 10 MR. WARD: I think we've got everything else. And it's just this one that may have 10 and we just had to move it. We couldn't keep it at 11 11 CIBC, because they were closing the account. So we been missed. The account. 12 12 rather moved it than accept a cheque, so we moved MS. GOLDBLATT: Ok, so I'm going to move 13 it. So, it's highly likely that it would have been 13 680. 14 14 commission payments. on, then. 15 15 THE DEPONENT: Okay. 16 16 CONTINUED EXAMINATION BY MR. WARD: 17 BY MS. GOLDBLATT: 17 689. Q. Okay, so yes, again the issue there 18 18 681. Q. If you could flip to tab number 11. is that it may have been commission statements. I 19 Tab 11 in the binder, under 13217. 19 take it may have been some Banner Brokers affiliate 20 A. M'hmm. 20 deposits as well that were ... 21 22 682. Q. So this is the November 2012 21 A. No, it would not have been. We had 22 ceased doing that with them much earlier than that. statements for account number There is a 23 23 payment on November 20, and November 29. One for We still got money into these accounts from several 24 24 93,000, one for 90,000. And they seem to be going clients, and FIRMA Foreign Exchange, as well as 25 25 other exchanges based on money that came in from our to 1587803 Ontario Limited, which is...we understand Page 151 _____ Page 153 ____ M. Morgan - 151 M. Morgan - 153 to be Aramor Payments, or Aramor as it's operating 1 clients. Banners was a very, very small window, and 1 2 2 3 right now. Is that correct? you see a lot of the activity from them between a 3 A. Yes, that's correct. certain point of the year until about September, Q. So, these payments that are 4 October, usually earlier. So this doesn't reference 4 683. 5 5 6 7 transferred to your company, I should...what account Banners at all. would those specific wires be going to? 6 690. Q. Why is this being produced then? I 7 Specifically, I've tried to trace them to the other mean you gave it to us? 8 8 account statements provided, and I can't find them. A. You asked for 2012, so I gave you 9 9 A. Right, CIBC shut our accounts off. 2012. That's what the year...that's the year that 10 10 Around that time of year. the activity took place, so that's what I gave you. 11 11 684. Q. Right. MR. WARD: Okay. 12 12 A. Or they gave us 60 days to move funds. So we ended up opening up an account with 13 13 CONTINUED EXAMINATION BY MS. GOLDBLATT: 14 Bank of Montreal at First Canadian Place. And so we 14 691. Q. There are a few other payments that simply moved our balance over there, at the time. 15 15 I wanted to ask you about. They relate to the time 16 16 685. Q. But is that separate and apart from frame of October 2012. So to the extent, are you 17 17 the BMO account you were using? confirming that no payments from October 2012 would 18 18 relate in any way to Banners Broker? A. It is. 19 686. 19 Q. So that's a secondary BMO account? A. I'm saying it's doubtful. I don't 20 A. That was a secondary account. We 20 have the exact dates. 21 Q. Right. 21 used BMO for our payroll and our bills, et cetera. 692. 22 Q. Do you have any recollection of the 22 A. But I know that we started to 687. 23 23 account number on that? encounter serious problems with Banners Broker. 24 Their payments coming in and going out. Probably up until about August, September of 2012. And our bank 24 A. I don't. We didn't stay with BMO 25 25 that long, mainly because we just stopped using

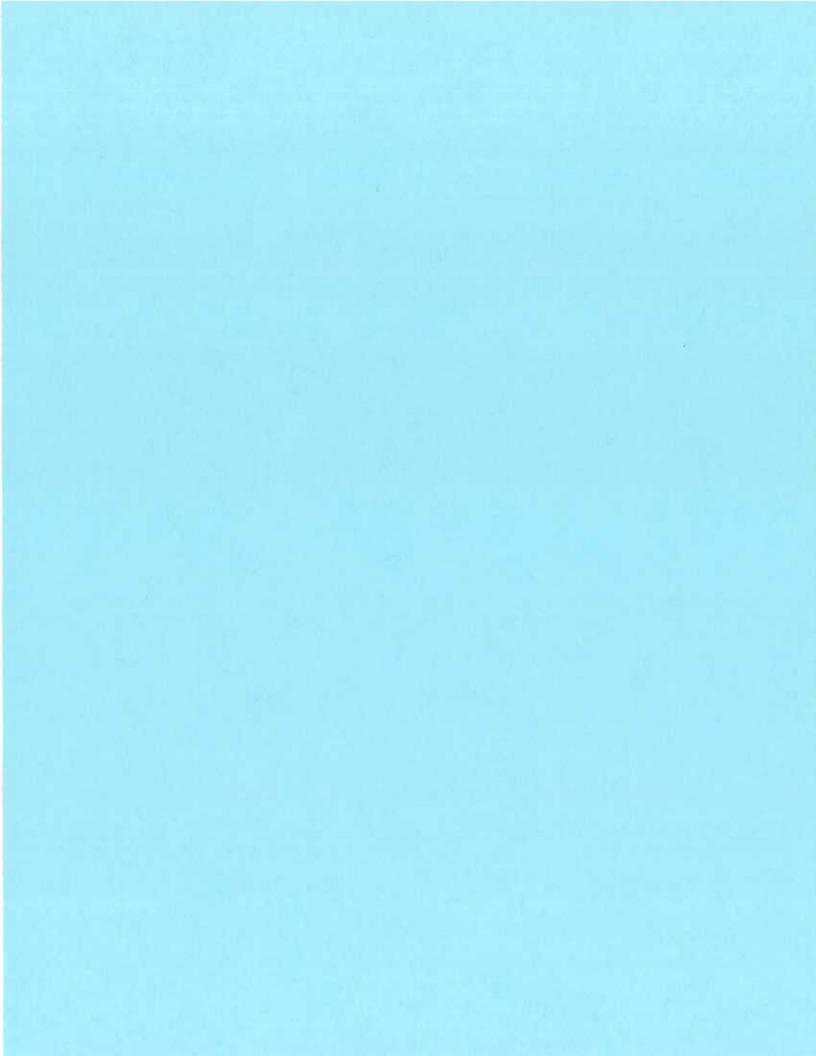
Sheet 40 Page 154	Page 156
Sheet 40Page 1541had givenhad put on us on notice at that time,2and so we told Banners Broker to cease this3activity, stop having funds sent to us in this4manner. And that we'd still help them with credit5card processing and other things. And they did6adhere to that. Why we kept the accounts open at7the time, was because there was a lot of lost wires8and transactions, and we still had other clients9that were using our accounts for other things, so we10couldn't immediately terminate.11693.Q. With that in mind, can I quickly12take you to two other transactions, just to confirm13that they don't relate to Banners Broker's monies?14A. Sure.15694.Q. One is if you turn to tab ten, which16is your October 2012 statements. There's a specific17wire foron October 16th. So that's page four,18and that's for 356,000 dollars. That's a receipt19into this account from 1587803, which again, is20Aramor Payments? And so, I'm just trying to21understand the nature of the receipt of this cash.22Where would this have come from?23A. October 16th.24695.25Q. It's a receipt into the account of25\$356,016.47, and it's come from another one of yourPage 155	Page 156 M. Morgan - 156 1 provided documentation of the wire sent. So if it 2 was a wire from FX firm, our FX firm would tell us, 3 you have incoming funds from this company in this 4 amount, and your name was referenced, and here is 5 the trade number, and here is the exchange. Do you 6 accept it, et cetera, and they put it into our 7 account. So, our other clients were very organized, 8 and they upload their files to us in our file 9 manager. They would document their process, and we 10 know where their funds are, and how to account for 11 that. They had very complex accounting teams on 12 their side, and their money was much more 13 substantial than Banners Broker. They didn't 14 operate a multi-level marketing company where money 15 had to go out right away. 16 699. Q. So how did you, or can we, account 17 for the Banners Broker contributions that went 18 through your accounts? 19 A. Primarily from the names that I gave 10 you, and the companies that you saw referenced.
 entities. It appears, it's under the 1587803 Ontario Limited name. I'm just trying to understand what transaction A. I'm not sure. We have FX accounts, where they would reference our name. I'm not 100 percent sure. We only had the CIBC and BMO accounts, and the BMO wasn't opened until late 2012, so I'm not certain. It says a wire transfer. I don't know if that's an error or not, but for that kind of money, my guess is that it came from one of our FX firms, and we were referenced as the listed name. CONTINUED EXAMINATION BY MR. WARD: 696. Q. Again, Max. Maybe just generally taking a step back from the details. A. Sure. 697. Q. We're looking at a CIBC bank account statement? A. M'hmm. 698. Q. In your name, and there's monies that go in and out of it. How did you keep track of what was Banners Brokers money, and what was money that related to your other clients? A. Well our other clients always 	1affiliates, that's how you would be able to tell.2That's why we provided the statements. If I were to3go through each wire that we got, I'd have to give4you the various clients IDs as to why they sent the5wire and how much. And that would take all day.6700.Q.7A.7A.8I can tell you whose are whose, but8I can tell you that specific one wouldn't be from9Banners.10701.Q.701.Q.701.Q.701.Q.701.Q.701.Q.701.So can you701.A.702.The fact that it's such a odd amount703.account.704.The fact that it's such a odd amount705.A.706.Ye in the was deposited into our707.A.708.So justwe're not interested in709.A.709.Ye in the monies that went through this701.A.702.So justwe're not interested in703.Q.703.Q.704.So how can we do that?705.Ye in the was of CIBC, or ask of Aramor?707.A.708.Ye in the would accept it from our709.FX firms globally, so I'm not certain they'd be able

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Sheet 41 Page 159 M. Morgan - 158 1 to provide. Is that something I should answer, or no? M. McCorgan - 158 3 MR. COHEN: Well we can take a look at the questions you're posing and attempt to provide an answer. UT 6 mR. WARD: Okay, because I mean, we are going to wap uson, in the mittles, and on time stip. But we're going to wap uson, in the mittles, and on time stip. But we're come back and continue this. But we're done to interested, like I Statistical is and that doesn't have to do the entities under investigation. 11 Sature. CONTINUED EXAMINATION BY MS, GOLDBLATT: O. And we're happy to go to CIBC and get that. If the sealer, if there's documentation, 20 mit hese accounts. Page 159 M. Morgan - 159 1 the exit time we meet. A. Sure. M. Morgan - 159 M. Morgan - 159 1 the next time we meet. A. Sure. M. Morgan - 159 M. Morgan - 159 1 the next time we meet. A. Sure. M. Morgan - 159 M. Morgan - 159 1 the DEPONENT: Thank you. M. Morgan - 159 M. Morgan - 150 1 the DEPONENT: Thank you. B REFERENCE PAGE QUESTION 8 MR. COHEN: Not we're off the record. M. Morgan - 150 M. Morgan - 150 M. Morgan - 150				_		- 60
2 no? MR, COHEN: Well we can take a look at the questions you're posing and attempt to provide an answer. UT 6 MR, WARD: Okay, because I mean, we are going toI think we've agreed that we're a going to wap up soon, in five minutes, and well come back and continue this. But obviously, we're not interested like I PAGE 11 said an anything that doesn't have to do with the entities understand that. PAGE NUMBER 12 well come back and continue this. But obviously, we're not interested like I I Contract between Aramor and Banners 11 said in anything that doesn't have to do with the entities understand that. PAGE 13 MR, COHEN: No, I think II' De able to help my client understand that. Page 150 Source 14 help my client understand that. Page 150 M. Morgan - 159 15 CONTINUED EXAMINATION BY MS, GOLDBLATT: A. Sure. M. Morgan - 159 15 M. Acky. M. Morgan - 159 M. Morgan - 159 16 MR, COHEN: CKay. M. Morgan - 159 M. Morgan - 159 17 THE DEPONENT: Thank you. M. Morgan - 159 M. Morgan - 161 18 MR, COHEN: And we're off the record. 9 2 64 301 2 M. MCOHEN: A	M. Morgan - 158 to provide. Is that something I should answer, or		.Page 160)		M. Morgan - 160
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M. Morgan - 159 1 the next time we meet. 2 A. Sure. 3 707. Q. On that note, so why don't we wrap 4 up here because it's almost 1:30. 5 MR. COHEN: Okay. 6 MR. WARD: Thanks for your time. 7 THE DEPONENT: Thank you. 8 MR. COHEN: And we're off the record. 9 2 64 301 10 3 70 328 11 4 71 336 12 5 98 458 13 6 99 465			Page 161			
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6 MR. WARD: Thanks for your time. 7 THE DEPONENT: Thank you. 5 NUMBER NUMBER NUMBER 8 MR. COHEN: And we're off the record. 8 1 56 258 9 2 64 301 10 3 70 328 11 4 71 336 12 5 98 458 13 6 99 465	4 up here because it's almost 1:30.	3				
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11 4 71 336 12 5 98 458 13 6 99 465		9	2	64	301	
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13 6 99 465		11	4	71	336	
		12	5	98	458	
14 7 158 703		13				
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Sheet 42 Page 162 ____ M. Morgan - 162 INDEX OF UNDER ADVISEMENTS 1 2 3 4 5 6 7 REFERENCE PAGE QUESTION NUMBER NUMBER NUMBER 8 1 77 364 9 2 665 146 Page 163 __ M. Morg 1 234567 **REPORTER'S NOTE:** Please be advised that any undertakings, objections, advisements and refusals are provided as a service to all c their guidance only, and do not purport to be legally bindi necessarily accurate and are not binding upon Victory Verba Reporting Services Inc. 8 9 10 11 12 13 14 15 16 17 18 19 I hereby certify the foregoing to be a true and accu transcription of the above-noted proceedings held before me 13th DAY OF APRIL, 2015, and taken to the best of my skill, ability and understanding. 20 21 22 23 24 25 26 27 28 29 30 **Certified Correct:** Ardita Balilaj Verbatim Reporter



Court File No. CV-14-10663-00 ONTARIO SUPERIOR COURT OF JUSTICE (Commercial List) IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1992, c. 27, s.2, AS AMENDED AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE ISLE OF MAN WITH RESPECT TO BANNERS BROKER INTERNATIONAL LIMITED APPLICATION OF MILES ANDREW BENHAM AND PAUL ROBERT APPLETON, IN THEIR CAPACITY AS JOINT LIQUIDATORS OF BANNERS BROKER INTERNATIONAL LIMITED, UNDER PART XIII OF THE BANKRUPTCY AND INSOLVENCY ACT (CROSS-BORDER INSOLVENCIES)

CC/am

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This is the Continued Examination purusant to the Bankruptcy and Insolvency Act of MAXWELL MORGAN, taken at the offices of CASSELS BROCK & BLACKWELL, Suite 2100, Scotia Plaza, 40 King Street West, Toronto, Ontario, on the 29th day of May, 2015.

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APPEARANCES: DAVID WARD ERIN CRADDOCK GILLIAN GOLDBLATT PHILIP GENNIS MAXWELL MORGAN

-- for the Receiver

-- self-represented

Sheet 2 Page 2	Page 4
M. Morgan - 161 INDEX OF PROCEEDINGS	M. Morgan - 163 1 714. Q. But we will go through them one at a 2 time, and then that will short-circuit things for 3 the rest of the examination. 4 A. Okay. 5 715. Q. We have taken these undertakings 6 from the transcript. So, we understand that we 7 already have them. 8 A. Okay.
PAGE NUMBER	9716.Q.But we have also tried to describe10them in a little more detail, so it is clear11A.That is fine.12717.Q.13A.Okay.
MAXWELL MORGAN, resumed Continued Examination by MR. WARD 160 - 281 Index of Exhibits 282 Index of Undertakings 283	14718.Q.Só, there are undertakings in total.15A.Okay.16719.MR. WARD:And before I forget, let's17mark this document as Exhibit 1 on the18continuned examination.We will call it19M1.20
Certificate 284	 21 EXHIBIT NO. M1: List of undertakings from April 13, 22 2015 examination of Maxwell Morgan 23 24 BY MR. WARD: 25 720. Q. So, the first undertaking, as I
Page 3 M. Morgan - 162 1 MAXWELL MORGAN, resumed 2 CONTINUED EXAMINATION BY MR. WARD: 3 708. Q. 4 A. Good morning, Mr. Maxwell. 4 A. Good morning. 5 709. Q. Just a couple of housekeeping 6 matters. We haven't resworn you this morning, 7 because we can agree that you are still under the 0 atters. We haven't resworn you thist attended 9 A. Sure. 10 710. Q. for your discovery? 11 A. Yes, that is fine. 12 711. Q. Thank you for that. I am passing to 13 you a list of undertakings A. 14 A. Okay. 15 712. Q. that we have taken from a 16 transcript of the examination that was conducted when you attended here on April the 13th. 18 A. Okay. Okay. 19 713. Q. And I think we can streamline things 16 if we walk th	Page 5 M. Morgan - 164 understand it, is to produce all Aramor records in respect of cash payments, and by that I mean cash payments that Aramor was across A. Yes. 5721. Qand we are obviously speaking specifically of Banners Broker-related cash payments. And, so, that could be cash payments that were at the direction of Banners Broker or any related companies. A. Okay. 722. Q. By or on behalf of either Mr. Dixit or Mr. Smith or anyone else that instructed you. A. Sure. So, with respect to that, I think the e-mails that I have seen, that you already have in your possession, that is the extent of the instructions that we have been given, and as far as the payment confirmations, those would have been on those e-mails, as well. 19 723. Q. Which e-mails are youand by all means, there a document there. A. Sure. 724. Q. That is the same document book that we had in front of you last time. A. I believefirst of all, all cash payments were done for Chris Smith. So, if anything

			50
	Sheet 3 Page 6 M. Morgan - 165		Page 8 M. Morgan - 167
4	IVI. MUUyali - 105	4	
	went outside of that, he would have received it and		behalf of the client.
2	then given it to any of his employees or potential	2	733. Q. Well, which companies did Aramor
3	vendors. So, yes, as far as cash payments, I saw a	3	deal with? Which of the eKash companies did you
4	list of e-mails just from Chris, and with my	4	deal with?
5	response, telling him where to pick up and the	4	A. Groupe Marche Kash and eKash. They
6	transaction ID number. I think from what I looked	6	have a numbered component to it, as well. I don't
7	at last time, there was maybe five or six e-mails.	7	have it off the top of my head, but eKash is just
8	It didn't happen very often. So, that would be the	8	
0			the businessdoing business as a name. The
9	extent of what we would have.	9	numbered company was an Ontario corporation.
10	725. Q. Okay. Let's just take a step back	10	734. Q. Can we get an undertaking for you to
11	and clarify what you are speaking of when you talk	11	review your records and give us the names of the
12	about cash payments.	12	eKash-related entities that Aramor dealt with to
13	A. Yes.	13	affect these cash payments for Mr. Smith?
14	726. Q. What is it that you mean when you	14	A. Sure. U/T
15	use the term "cash payments"?	15	735. Q. And furthermore, if you could give
16	A. Physical cash pickup. So, you would	116	us the jurisdiction in which the companies operated,
17	go to a specified location through a money service	17	as well, please?
18	business and pick up the each		A. Jurisdiction, yes, okay. U/T
10	business and pick up the cash.	18	
19	727. Q. Okay.	19	736. Q. And if there was a principal or a
20 21	A. Okay.	20	person within those companies that you dealt with,
21	728. Q. And is that because Aramor would	21	we would like, as well, please.
22	have wired cash to that location forwired funds	22	A. Yes. U/T
23	to that location	23	737. Q. Okay. And the contact information
24	A. Yes	24	for that person, as well?
25	729. Qjust let me finish the	25	A. The only contact info I would have
<u> </u>			
	Page 7		Page 9
	Page 7 M. Morgan - 166		Page 9 M. Morgan - 168
1	M. Morgan - 166 question	1	M. Morgan - 168 for them at this point would be an e-mail address
1	M. Morgan - 166 question A. Oh, sorry.	1 2	M. Morgan - 168 for them at this point would be an e-mail address and Skype ID.
1 2 3	M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for	1 2 3	M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood.
1 2 3 4	M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup?	1 2 3 4	M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood. A. Okay.
1 2 3 4 5	M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire	1 2 3 4 5	M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a
1 2 3 4 5 6	M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup?	1 2 3 4	M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood. A. Okay.
1 2 3 4 5 6 7	M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for	1 2 3 4 5	M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a
1 2 3 4 5 6 7	M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and	1 2 3 4 5	M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada
1 2 3 4 5 6 7 8	M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow	1 2 3 4 5 6 7 8	M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada that operate under the business name "eKash".
1 2 3 4 5 6 7 8 9	M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow whatever instructions were given. It was only after	1 2 3 4 5 6 7 8 9	M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada that operate under the business name "eKash". THE DEPONENT: I can give you a website,
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1 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 12 10 11 12 10 10 10 10 10 10 10 10 10 10 10 10 10	 M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow whatever instructions were given. It was only after that we would find out what the money was for. So, essentially, you know, we had a payment service business partner that said, "We can provide a cash payments, we can provide payments to India". This happened to be the same vendor, and we would wire the funds to them, and they would convert the cash for them. 731. Q. So, this is eKash? A. eKash. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Page 9 M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada that operate under the business name "eKash". THE DEPONENT: I can give you a website, if you would like. You can look it up. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: but there is noI am doing a business name search. 739. MR. WARD: WR. WARD: So, let's take it from there. BY MR. WARD: So, let's take it from there.
1 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 12 10 11 12 10 10 10 10 10 10 10 10 10 10 10 10 10	 M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow whatever instructions were given. It was only after that we would find out what the money was for. So, essentially, you know, we had a payment service business partner that said, "We can provide a cash payments, we can provide payments to India". This happened to be the same vendor, and we would wire the funds to them, and they would convert the cash for them. 731. Q. So, this is eKash? A. eKash. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Page 9 M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada that operate under the business name "eKash". THE DEPONENT: I can give you a website, if you would like. You can look it up. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: but there is noI am doing a business name search. 739. MR. WARD: WR. WARD: So, let's take it from there. BY MR. WARD: So, let's take it from there.
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 10 7 8 9 10 11 12 10 10 10 10 10 10 10 10 10 10 10 10 10	 M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow whatever instructions were given. It was only after that we would find out what the money was for. So, essentially, you know, we had a payment service business partner that said, "We can provide a cash payments, we can provide payments to India". This happened to be the same vendor, and we would wire the funds to them, and they would convert the cash for them. 731. Q. So, this is eKash? A. eKash. 732. Q. And how do you spell eKash? 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Page 9 M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada that operate under the business name "eKash". THE DEPONENT: I can give you a website, if you would like. You can look it up. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: but there is noI am doing a business name search. 739. MR. WARD: 739. MR. WARD: WAR. WARD: Okay. 740. Q.
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 13 14 5 16 17 18 9 20	 M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow whatever instructions were given. It was only after that we would find out what the money was for. So, essentially, you know, we had a payment service business partner that said, "We can provide a cash payments, we can provide payments to India". This happened to be the same vendor, and we would wire the funds to them, and they would convert the cash for them. 731. Q. So, this is eKash? A. eKash. 732. Q. And how do you spell eKash? A. Just E and then K-A-S-H. They also 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 Page 9
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 15 16 17 10 10 10 10 10 10 10 10 10 10 10 10 10	 M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow whatever instructions were given. It was only after that we would find out what the money was for. So, essentially, you know, we had a payment service business partner that said, "We can provide a cash payments, we can provide payments to India". This happened to be the same vendor, and we would wire the funds to them, and they would convert the cash for them. 731. Q. So, this is eKash? A. eKash. 732. Q. And how do you spell eKash? A. Just E and then K-A-S-H. They also go by Groupe Marche Kash. So, G-R-O-U-P-E 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada that operate under the business name "eKash". THE DEPONENT: I can give you a website, if you would like. You can look it up. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK:but there is noI am doing a business name search. 739. MR. WARD: Okay. Well, we have the undertaking. So, let's take it from there. BY MR. WARD: PMR. WARD: Q. But just returning to the subject of records in relation to the administration of these cash payments, clearly there would be e-mails,
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 14 5 10 10 10 10 10 10 10 10 10 10 10 10 10	 M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow whatever instructions were given. It was only after that we would find out what the money was for. So, essentially, you know, we had a payment service business partner that said, "We can provide a cash payments, we can provide payments to India". This happened to be the same vendor, and we would wire the funds to them, and they would convert the cash for them. 731. Q. So, this is eKash? A. eKash. 732. Q. And how do you spell eKash? A. Just E and then K-A-S-H. They also go by Groupe Marche Kash. So, G-R-O-U-P-E M-A-R-C-H-E K-A-S-H, and then they also have two or 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Page 9 M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada that operate under the business name "eKash". THE DEPONENT: I can give you a website, if you would like. You can look it up. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: but there is noI am doing a business name search. 739. MR. WARD: 740. Q. But just returning to the subject of records in relation to the administration of these cash payments, clearly there would be e-mails, right? 740. Q. But just returning to the subject of records in relation to the administration of these cash payments, clearly there would be e-mails, right?
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 12	 M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow whatever instructions were given. It was only after that we would find out what the money was for. So, essentially, you know, we had a payment service business partner that said, "We can provide a cash payments, we can provide payments to India". This happened to be the same vendor, and we would wire the funds to them, and they would convert the cash for them. 731. Q. So, this is eKash? A. eKash. 732. Q. And how do you spell eKash? A. Just E and then K-A-S-H. They also go by Groupe Marche Kash. So, G-R-O-U-P-E M-A-R-C-H-E K-A-S-H, and then they also have two or three numbered companies in Quebec, a couple 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada that operate under the business name "eKash". THE DEPONENT: I can give you a website, if you would like. You can look it up. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK:but there is noI am doing a business name search. 739. MR. WARD: Okay. Well, we have the undertaking. So, let's take it from there. BY MR. WARD: T40. Q. But just returning to the subject of records in relation to the administration of these cash payments, clearly there would be e-mails, right? On Aramor's servers? A. Yes, but I think you guys have them
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 2 3 4 5 16 7 8 9 10 11 12 3 14 5 16 7 8 9 10 11 12 11 11	 M. Morgan - 166 question A. Oh, sorry. 730. Qto be converted into cash for pickup? A. Yes. So, basically, they would wire funds for a number of reasons, usually for disbursements for their customers, or members and vendor payments, et cetera. So, we would follow whatever instructions were given. It was only after that we would find out what the money was for. So, essentially, you know, we had a payment service business partner that said, "We can provide a cash payments, we can provide payments to India". This happened to be the same vendor, and we would wire the funds to them, and they would convert the cash for them. 731. Q. So, this is eKash? A. eKash. 732. Q. And how do you spell eKash? A. Just E and then K-A-S-H. They also go by Groupe Marche Kash. So, G-R-O-U-P-E M-A-R-C-H-E K-A-S-H, and then they also have two or 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Page 9 M. Morgan - 168 for them at this point would be an e-mail address and Skype ID. 738. 738. Q. Understood. A. Okay. MS. CRADDOCK: Actually, we did a search. There is no companies in Canada that operate under the business name "eKash". THE DEPONENT: I can give you a website, if you would like. You can look it up. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: I found the website THE DEPONENT: Okay. MS. CRADDOCK: but there is noI am doing a business name search. 739. MR. WARD: 740. Q. But just returning to the subject of records in relation to the administration of these cash payments, clearly there would be e-mails, right? 740. Q. But just returning to the subject of records in relation to the administration of these cash payments, clearly there would be e-mails, right?

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		1	5
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Sheet 4 Page 10 M. Morgan - 169 don't know. He only asked for it a handful of times. It is probably about six e-mails in total. I saw the e-mails when working with my previous lawyer, and I think you guys already have it on record. There really isn't anything else outside of that that I would be able to provide, that would give youglean more information that you need. 741. Q. Again, just so I understand it A. Sure. 742. Qwould Aramor wire Banners Broker funds to eKash? A. There were times, there were a few times where he wired directly to eKash because we didn't want to get in the middle. 743. Q. "He" being Chris Smith? A. Chris, right. And there were times where we already had his funds, and then he asked us to wire to eKash. 744. Q. Right. 744. Q. Right. A. eKash provided Indian cash payments on the ground in India, which was the primary reason they were initially signed up, and then when he realized they had a money service business here, as 	$ \begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 23 \\ 23 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24 \\ 24$	 Page 12 M. Morgan - 171 I think on further review, they are not complete. So, we mayI will return to that in a minute, but A. Sure. 752. Q. And similarly, I am going to return to e-mails. A. Sure. 753. Q. Just because, again, our objective is tosuch records as exist that are Banners Broker-related, we want to obtain, and I know you had other clients, apart from Banners Broker. We are not interested in that. A. I know. That is where it gets sticky, because eKash did work for us with other clients, as well. So, I can'tyou know, in all honesty, I wasn't the best record-keeper of each thing. I mean, we cared about what we reported to CRA, obviously, but outside of that, I would have to go back diligently and try to find the details. And it might be a bit sticky. 754. Q. Well, let's see what we can get, then. There is an undertakinglet's look at the next one.
20	realized they had a money service business here, as		
24 25	well, and they could provide cash on the ground here for him in large quantities, he had asked us to send	24	A. Sure. 755. Q. When we met on April the 13th, you
25			
	Page 11		
1 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	M. Morgan - 170 money there, as well. 745. Q. Okay. A. Yes, so 746. Q. So, I am not interested in the A. In the eKash 747. Q. No, I am not interested in the occasions where Chris Smith A. Wired directly 748. Q. Directly to eKash. A. Okay. 749. Q. What I am interested in is the situations where you, being Aramor, in presumably your CIBC bank accounts A. Yes. 750. Qwired money, forwarded on money to eKash on Chris' instructions. Now, presumably there would bein addition to e-mails, there would be bank records that documented that, correct? A. Whatever is already there would beit would be in there somewhere. I haven't reviewed it, necessarily, toit happened so few times that I don't really have dates. I mean, I can look at the e-mails and then probably try to	1 2 3 4 5 6 7 8 9 0 11 1 2 3 4 5 6 7 8 9 0 11 1 2 3 4 5 6 7 8 9 0 11 1 2 3 4 5 6 7 8 9 0 11 1 2 3 4 5 6 7 8 9 0 11 1 2 3 4 5 6 7 8 9 0 11 1 2 3 4 5 6 7 8 9 0 11 1 2 3 4 5 6 7 8 9 0 11 1 2 3 4 5 6 7 8 9 0 11 1 2 3 4 5 6 7 8 9 0 11 1 1 2 3 4 5 6 7 8 9 0 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	 Page 13 M. Morgan - 172 mentioned that Tricia had prepared some sort of a list. And it wasn't clear on April 13thyou believed you had given to us, but you weren't certain, and it wasn't clear whether the list was complete. A. I think the list was either a list of the funds that were incoming wires, as well asmostly outgoing wires to their customers. 756. Q. Can you turn to tab D, please, in the A. Yes? 757. Q. There. A. Yes? 757. Q. There. A. Yes. So, this is, I believe, what she sends. This was just to give you an idea of the disbursements that went out, and I guess the incoming funds, what much of the incoming funds were for 758. Q. Okay. So, I want tolet's disassemble tab D. Do you see a blue sheet halfway through it, Max? A. Blue sheet halfway through it? 759. Q. Right. A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 4 5 6 7 8 9 10 11 21 20 21 22	M. Morgan - 170 money there, as well. 745. Q. Okay. A. Yes, so 746. Q. So, I am not interested in the A. In the eKash 747. Q. No, I am not interested in the occasions where Chris Smith A. Wired directly 748. Q. Directly to eKash. A. Okay. 749. Q. What I am interested in is the situations where you, being Aramor, in presumably your CIBC bank accounts A. Yes. 750. Qwired money, forwarded on money to eKash on Chris' instructions. Now, presumably there would bein addition to e-mails, there would be bank records that documented that, correct? A. Whatever is already there would beit would be in there somewhere. I haven't reviewed it, necessarily, toit happened so few times that I don't really have dates. I mean, I can	1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 5 6 7 8 9 0 11 2 3 4 5 5 6 7 8 9 0 11 2 3 4 5 1 1 2 3 4 5 1 1 2 3 4 5 1 1 2 3 1 1 2 3 1 1 1 2 3 1 1 2 1 1 1 2 1 1 1 1	M. Morgan - 172 mentioned that Tricia had prepared some sort of a list. And it wasn't clear on April 13thyou believed you had given to us, but you weren't certain, and it wasn't clear whether the list was complete. A. I think the list was either a list of the funds that were incoming wires, as well asmostly outgoing wires to their customers. 756. Q. Can you turn to tab D, please, in the A. Yes? 757. Q. There. A. Yes. So, this is, I believe, what she sends. This was just to give you an idea of the disbursements that went out, and I guess the incoming funds, what much of the incoming funds were for 758. Q. Okay. So, I want tolet's disassemble tab D. Do you see a blue sheet halfway through it, Max? A. Blue sheet halfway through it? 759. Q. Right.

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	Sheet 5 Page 14	<u> </u>	Page 166
	M. Morgan - 173		M. Morgan - 175
	compared them.	1	disbursements for them. So, if their customers sent
)	A. Okay.	2	money, this was to payor sent money in to Banners
3	761. Q. Now, you provided, or Tricia	23	Broker, and at some point we would disburse money
ļ	provided for us both of these lists?		back to them in various forms, and that could have
)	A. Yes.	4 5	been cash pickups. That could have been
))	762. Q. And I need you to just walk us	6	disbursements going out. That could have been
) 7			
	through both of them, starting with the first one		payments
}	A. Before the blue sheet?	8	770. Q. Understood, yes. And I want to deal
)	763. Q. Before the blue sheet. So, we are	9	with disbursement separately.
)	behind tab D, before the blue sheet	10	A. Sure.
	A. Yes?	11	771. Q. But just looking at the pages behind
)	764. Qand before I forget, I am going	12	tab D, before the blue tab.
}	to mark this brief of documents as Exhibit 2. So,	13	A. Okay.
ļ	Exhibit M2 on your examination, so we can be clear	14	772. Q. We agree that it documents
)	for the record. So, the first question is, who	15	receipts
Ì		16	A. Yes.
	prepared what we are looking at?	117	773. Qfrom either Banners Broker
7	A. I think we both did. I roughly		
}	tried to do some on my own, and then I asked her to	18	affiliates
)	assist me in getting more details. Just a	19	A. Okay.
)	roughjust rough numbers and names. We never	20	774. Q. Or, in the first two instances, on
	really sent out any other payment to individual	21	the top of page 1, for Monitise Group Inc.
)	people. We usually just deal with companies, so we	22	A. M'hmm.
}	knew that whatever names we saw on the CIBC account	23	775. Q. And then at the bottom of the last
ļ	would have belonged to them, and some of the names	24	page, before the blue tab, you will see there is a
5	look familiar, because they were sent more than	25	heading that you have prepared, it says:
	Page 15		Page 17
	M. Morgan - 174		M. Morgan - 176
	once.	1	"Wires from Ontario numbered
)	765. Q. But what wasI mean, what were	2	companies"
}	youwhat does this indicate? Like, this	23	So, am I correct that the entries below that
	in procumpbly this is just receipte right?	11	heading
	ispresumably, this is just receipts, right?		
)	A. Yes, this is just money that went	5	
)	out on behalf of Banners Brokers. So, it is to say,	67	776. Qare monies that Aramor received
	"Well, this is"and we don't know if this is all		from Banners Broker-affiliated numbered companies.
	of their information, but this is a company sending	8	A. That is not clear to me. I know
	us money and us doing disbursements on their behalf	9	that they would neverthey didn't have any
	and saying this is why they sent us the bulk of the	10	companies in Quebec. My assumption is that and it
	money.	11	is an assumption. I don't remember fully, but these
	766. Q. But in fairness, the way I read	12	Quebec inco companies look like they might have been
I	this, this is just monies that Aramor received	13	eKash. eKash was operated out of Quebec. They sent
		111	money to eKash, or eKash processed some funds for
	Δ From their clietomere	1117	them, and some of those funds ended up back to us
	A. From their customers.	1115	
	767. Q. Or, alternatively, I mean, you look	14	
	767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc.	116	for payouts or for whatever purpose. It is a bit
	767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc. A. Correct.	16	for payouts or for whatever purpose. It is a bit tangled. The reason I put it there is because none
• • • • • •	767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc.	16 17 18	for payouts or for whatever purpose. It is a bit tangled. The reason I put it there is because none of my other clients have Quebec numbered
	767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc. A. Correct.	16 17 18 19	for payouts or for whatever purpose. It is a bit tangled. The reason I put it there is because none of my other clients have Quebec numbered corporations. So, I figured we would include that
	 767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc. A. Correct. 768. Q. Okay. And this doesn't deal with disbursements, correct? 	16 17 18 19 20	for payouts or for whatever purpose. It is a bit tangled. The reason I put it there is because none of my other clients have Quebec numbered corporations. So, I figured we would include that because we weren't sure.
	 767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc. A. Correct. 768. Q. Okay. And this doesn't deal with disbursements, correct? A. No, this is actually incoming funds. 	16 17 18 19 20	for payouts or for whatever purpose. It is a bit tangled. The reason I put it there is because none of my other clients have Quebec numbered corporations. So, I figured we would include that because we weren't sure.
	 767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc. A. Correct. 768. Q. Okay. And this doesn't deal with disbursements, correct? A. No, this is actually incoming funds. 769. Q. Incoming? 	16 17 18 19 20 21	for payouts or for whatever purpose. It is a bit tangled. The reason I put it there is because none of my other clients have Quebec numbered corporations. So, I figured we would include that because we weren't sure. 777. Q. Okay. But you believe that these
	 767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc. A. Correct. 768. Q. Okay. And this doesn't deal with disbursements, correct? A. No, this is actually incoming funds. 769. Q. Incoming? A. From their customers. But we wanted 	16 17 18 19 20 21 22	 for payouts or for whatever purpose. It is a bit tangled. The reason I put it there is because none of my other clients have Quebec numbered corporations. So, I figured we would include that because we weren't sure. 777. Q. Okay. But you believe that these were receipts from these Quebec numbered companies
	 767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc. A. Correct. 768. Q. Okay. And this doesn't deal with disbursements, correct? A. No, this is actually incoming funds. 769. Q. Incoming? A. From their customers. But we wanted to relate it to Banners Broker. There were two 	16 17 18 19 20 21 22 23	 for payouts or for whatever purpose. It is a bit tangled. The reason I put it there is because none of my other clients have Quebec numbered corporations. So, I figured we would include that because we weren't sure. 777. Q. Okay. But you believe that these were receipts from these Quebec numbered companies or, in the first case, an Ontario numbered company,
	 767. Q. Or, alternatively, I mean, you look at the first two entries from Monitise Group Inc. A. Correct. 768. Q. Okay. And this doesn't deal with disbursements, correct? A. No, this is actually incoming funds. 769. Q. Incoming? A. From their customers. But we wanted 	16 17 18 19 20 21 22	 for payouts or for whatever purpose. It is a bit tangled. The reason I put it there is because none of my other clients have Quebec numbered corporations. So, I figured we would include that because we weren't sure. 777. Q. Okay. But you believe that these were receipts from these Quebec numbered companies

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	Sheet 6 Page 18 M. Morgan - 177		Page 20 M. Morgan - 179	
1	778. Q. Okay.	1	A. Sure.	
2	A. That is our belief.	11 2	789. Qyour company	
3	779. Q. Now, in terms of preparing these	23	A. Yes.	i.
4	pages that we are looking at, the receipt side, what		790. Qand either Banners Broker or any	
5	source documentation did you or Tricia look at to	5	of the associated corporations, or the individuals	
6	prepare this?	II õ	that are associated with Banners Brokers and those	
	A. Well, for Tricia specifically,	4 5 6 7	are Smith, Joseph and Dixit primarily.	
8	justwe had lists of names, that they would send	8	A. Okay.	
9	for payments coming in. Oftentimes, it was just our	9	791. Q. All right? Now, the e-mailsin	
10	bank statements, because some monies that came in	10	terms of the operation of your business, did you	
11	were lost at times. And for the Quebec inco, that	111	have an e-mail server that you worked off, or did	
12	was purely off bank statements. Sometimes, money	12	you have a web-based e-mail server?	
13	came in and we would have to go and ask them what it	13	A. It is web-based, but we also have	
14	was for or why it came in, or whatever the case may	14	file management, file manager, where our clients can	
15	be. So, yes, we worked off of a few different	15	upload e-mails to. Not e-mails, but their list and	
16	assumptions.	16	payment instructions to. And we also have a payment	
17	780. Q. Well, you worked off bank	17	gateway that clients can upload items to.	
18	statements, right?	18	792. Q. So, the web-basedso, there is a	
19	A. That was the primary source.	19	payment gateway?	
20	781. Q. Right. Anything else?	20	A. Yes.	
21	A. Yes, lists that Chris would send to	21	793. Q. A	
22	do payouts, or lists that he would send saying, "We	22	A. File manager, sort of an FTP, and	
23 24	are expecting money from these members". 782. Q. Okay. So, payout lists, and they	23 24	then web-based e-mail. 794. Q. Okay. And the web-based e-mail	
25	782. Q. Okay. So, payout lists, and they would be sent by e-mail, presumably?	25	794. Q. Okay. And the web-based e-mail account was	
L	Page 19	· · · · · · · · · · · · · · · · · · ·	Page 21	
	M. Morgan - 178		M. Morgan - 180	
1	A. Yes.	1	A. Google.	
2	783. Q. And were thosewere the payout	2	795. QĞoogle, okay.	
3	lists kept? Presumably they would still be	2 3 4 5	A. Yes.	
4	available on	4	796. Q. So, I suspect, and in fact, Erin	
5	A. Yes. I canyes, they were.		assures me that to the extent that you used a	
6	784. Q. Okay. I am going to deal with all	67	web-based e-mail provider like Google, it would be	
	the e-mails at once. So		possible to, perhaps with our assistancelike an	
8	A. Sure.	8 9	IT specialist to go in and obtain copies of all	
9	785. QI am not going to	10	e-mails that went between Aramor and the entities	
10 11	A. Yes, they were kept for the most	10	that we are interested in, the Banners Brokers entities?	
12	part. We have 786. Q. Yes.	12	A. Yes and no. A lot of the	
13	Aa fairly	13	instructions that weI mean, you could, but it is	
14	787. Q. Let's just talk about e-mails now,	14	not all very clear. I mean, oftentimes they had	
15	because one of the undertakings that we want to get	15	immediate instructions. They would send a Skype	
16	from you iswe have some e-mails, you are correct,	16	request, they would BBM me. They would call me on	
17	in that binder, okay? I don't believe that up to	17	the phone, they would upload it. You know, we tried	
18	now, you have actually produced e-mails because we	18	to get them to stick to uploading it to our file	
19	haven't directly asked you for e-mails. There are	19	manager because it is secure, and the servers are	
20	some e-mails that you either authored or received	20	not in Canada. So, that was our request initially,	
21	that we will be looking at later this morning.	21	because we felt it was more secure for them and our	
22	A. Yes, okay, sure.	22	clients, being the various industries that we deal	
23	788. Q. But what we really need to get, Max,	23	in, but	
24 25	is a complete set of e-mails between Aramor	24 25	797. Q. Well, I appreciate there may not be a lot of Google e-mails that relate to Banners	
1 / 20	Payments	106	a lat at (Coodia a maile that rolate to Panhare	

1 Broker 2 A. Right. 3 798. Qbut to the extent that they 4 exist, and we know that there are some 806. 5 A. There are some that exist. I 3 6 wouldn't allow it in terms of having an IT person 5 7 out, because then they would be privy to checking 5 8 other clients' information. I think that would be 9 9 wrong. 1 A. I could get payment in 10 799. Q. Well, wedo you have an 10 11 alternative suggestion as to how you could get those 11 1 12 to us? Q. Well, wedo you have an 10 13 A. Lould hand over what we have, and 10 I mean, a lot of the e-mails I got a 14 you guys will have to take it on faith that I am 12 807. Q. Well, we needand 15 porviding the correct documents. There is a lot of 16 808. Q. Right, through the correct you would like. 19 800. Q. No, I appreciate that, and we need 10 would like all e-mails that were ex 22	o ask you for on
1 Broker 2 A. Right. 2 A. Right. 2 806. Qthe request and th 3 798. Qbut to the extent that they 3 am going to put on1 am going to 4 exist, and we know that there are some 5 A. There are some that exist. I 3 am going to put on1 am going to 6 wouldn't allow it in terms of having an IT person 5 this yourself, or we can assist with 7 out, because then they would be privy to checking 5 this yourself, or we can assist with 8 other clients' information. I think that would be 9 for, that is specific to what you are 10 799. Q. Well, wedo you have an 10 I mean, a lot of the e-mails I got a 11 alternative suggestion as to how you could get those 10 I mean, a lot of the e-mails I got a 12 to us? Q. Well, we needand 11 and mid-2013? 16 things that you are looking for that were not 12 800. Q. No, I appreciate that, and we need 13 A. If there is something specific you 11 are looking for, yes, I can look for it and provide 22	ne undertaking I o ask you for on
Page 23 M. Morgan - 182 1 don't, but in most cases I have beenyou know, I 1 A. I will provide those. 2 didn't retain a lawyer initially. That was just 1 A. I will provide those. 3 done on the request, well, not request, but on the 3 Max, and it is too burdensome, th 4 advice of someone, and when I was contacted by 5 Spergel, I had handed over whatever was asked 6 initially 6 accounts, assist	th an independent instructions what you are looking re looking for. are just I there is a of 2011 and mid-2013. ramor rourse of rour relationship is that we xchanged, to do with payment e need a complete e-mails that are
7801.Q.Right.8Abut I mean9802.Q.No, and we appreciate that.10A.Right, so11803.Q.And I don't think this should be12particularly burdensome. We can take it a step at a13time. I mean, we are14A.It is more time-consuming than15burdensome, but I understand what you guys need to16get, and17804.Q.19will line it up20805.Q.20805.Q.21we don't know what exists in order to be specific22with respect to the content of e-mails. So, I think23that accepting that there may not be a lot of	M. Morgan - 184 U/T you get into it, hen what we propose one who is not going your third-party the en you would have ke sure that we t Banners ch that in a e will ask you to be sufficient. is really does of what we are t you mentioned

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	Sheet 8 Page 26		Page 28
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 15 16 17 18 9 20 21 22 23 24 25	Sheet 8 Page 26 A. Yes. 816. Q. Can you just describe for me A. Payment gateway is something that connects, oftentimes, a client's website with a bank. And sometimes it is also just used for relaying information that can be easily transmitted to a bank or a third-party payment provider securely. Encrypted, perhaps, when you are dealing with sensitive banking information, such as whatever would be considered PCI-compliant, like Visa or MasterCard. So, it wasn't unusual for us. We had a payment gateway. We used it for very specific payment models for our clients. Banners didn't use it very often, but we had encouraged them to go ahead and upload transactions to that payment gateway. I can't recall if they ever did. 817. Q. So, to thewere the transactions that Banners Broker may A. Yes. 818. Qhave uploaded to the payment gateway, would they be archived on a server? A. Yes. I mean, I can access those. I can give you all of the payment instructions that were ever sent to us. 819. Q. Please. I will take that as an M. Morgan - 186	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 3 24 25	 M. Morgan - 187 824. Q. What did you call it internally? What wasyou could say, "Chris, upload your payout list to" A. To our file manager. 825. Q. To the file manager, okay. A. I don't know if there was a code name that my staff used. I don't know, but that is what it is called. They never really did, though, very much. Really, it is other clients that have taken advantage of it. You know, we built it at other clients' request, but Chris generally e-mailed whatever he wanted to get done at some point. 826. Q. And presumably you still have access to the file manager? A. Yes. 827. Q. Okay. So, to finish off this set of undertakings, could you please review the file management system and produce for us any Banners Broker-related information A. Sure. 828. Qincluding payout instructions? A. Okay. U/T 829. Q. Thank you. A. No problem. 830. Q. So, I just want to return, if we
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 21 22 23 24 25	 A. It is not a problem. U/T 820. Q. And then just to finish off theyou had a file management system, as well? A. Yes, and 821. Q. And you mentioned that the servers were not in Canada? A. Yes. 822. Q. Just describe that for me. A. That is similar to the payment gateway in a sense that it doesn't communicate with a third party in any way, but it is just archives, files for our clients. So, even if they are looking to apply for other accounts elsewhere, or different things, they can, you know, upload their directors' passports, corporate documents, et cetera, without e-mailing them. To the extent of what Banners Broker might have done on there, it isI believe it is probably just some lists of payments that went out. They used to upload and e-mail them, so I am certain I already have them available on Gmail. 823. Q. And for my note, what was the name of that file management system? Did it have, like, a A. Not really. It was just 	2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 14 15 16 17 18 9 20 21 22 3 24 25	of Exhibit M2. A. Okay. 831. Q. For the purposes of receiving these funds, you have given us a list of Aramor account numbers. A. Yes. 832. Q. And these are at your CIBC? A. Yes. 833. Q. It all seems to beif I am reading it correctly, they are all the same account number? A. Yes, that is correct. 834. Q. But I understood that you had several accounts at CIBC, one or two at Bank of Montreal, and perhaps others that were used for Banners Broker purposes. A. Loosely. So, I will explain. The CIBC account was the primary account used to receive funds from their members. It was posted to their website, unbeknownst to me until later on. It was also used to fund, if they needed to send us money. We also had the EFT account, which wasn't used very much. There is a fraction of transaction that went through that, and that was with BMO, and then we also had an account with BMO for Aramor that we

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M. Morgan - 199 M. Morgan - 199 1 might have readwed a couple of transactions on 2 behald of Banners Broker. 3 end of our biases with hem. 4 635. C. Ripht. 5 A. So, Idon't ecall the amounts, but 543. O. Okay, 9 B88. Q. Irecall the amounts, but 544. O. In antiopation of dosing those 9 B88. Q. Irecall the first time, 643. O. Right, oday, 10 that is right. So card from. There wee four 74. 74. 74. 11 accounts at CIFC, two US dollar 14. 843. 0. Okay, 845. 11 they weent 14. 74. 74. 74. 74. 12 A. The primary account that the was one primary account they weel 15 16 A. The primary account they weel 16 A. The primary account they weel that the account for weel that the account for weel that account is come chand any 76 76. 76. 17 was the only account hey weel that account is come chand any 76. 76. 76. 76. 16 A. That is optical that account i		Sheet 9 Page 30	Page 3261
2 befail of Barness Broker. This was towards the tail end of our business with them. 2 843. C. Okay. 4 835. Q. Fight. 5 A. So, Idon't real the amounts, but they weref. Lin Bagened maybe ance or twice, and then it was over, and we had set up that BMO account because CBO was obeing our accounts with. 8 844. Q. It is complete? 6 they weref. Lin Bagened maybe ance or twice, and then it was over, and we had set up that BMO account because CBO was obeing our accounts with. 8 845. Q. Right, and there were four transactions. 8 9 836. Q. If it and there was one primary accounts at CBO, two US dollar and two Canadian. 10 4 Yes, US dollar and two Canadian. 11 accounts at CBO, two US dollar and two Canadian. 10 466. Q. So, just for the record, hen, as I understand it, to wag up und at you said, you have given the receiver a concilete set of CBC back accounts theme of them the US side 13 account represent form that we are looking at registrow, tends in Imp. 10 A. That is correct. 14 839. Qdocument that we are looking at registrow, tends in Imp. 20 A. And it was understoot that that is vata may account represent that we are statements for the pirany account of USC. 2 A. Whatever else I provide for that stare only one page. Son, we just want to bes set that vare only one			M. Morgan - 191
3 end of our business with them. 4 835. Q. [Bpit, 5 A. So, viralever you have there, it was 4 835. Q. [Abstract the amounts, but 6 they weentIt happened maybe ance or twice, and 7 then it was over, and we had set up that BM3 accounts 8 back.our recall that from ther first time, 9 836. O. Inceall that from ther first time, 10 that is right. So, apart fromthere were four 11 accounts. BCIDC, would solding 12 A. Yes, it was only one account that 13 account account account in the US sold and two Caradian. 14 38. O. Which is the one that has the 15 account account in the US sold and two Caradian. 16 A. That is orght. 17 was the only account in the US sold and two Caradian. 18 abs. O. Which is the one that has the 19 account accounts for them, you know, we had account 20 A. That is orght. 21 639. O. Which is the one that has the 22 M. Matter ease I provided for that 23 A. Matter we accounts for them, you know, we had account		1 might have received a couple of transactions on	
 4 855. C. Right. 4 855. C. Right. dear. 8 844. Q. It is complete? 6 A. In anticipation of closing those 9 836. Q. Inceal that is right. So, part from there were four 10 that is right. So, part from there were four 11 accounts at CIBC, would Solata and two Canadian. 12 A. Yes, It was only one account that 13 they used. Two US dollar and two Canadian. 14 837. O. Right, and there was one primary account in the US side 15 account? 16 A. The primary account in the US side 17 was the only account they used. 18 38. Q. Which is the one that has the account definition in the US side 19 account? 20 A. That is right. 21 and tasked for the full year unil December 22 right now. it ends in mark was reloxing at the was the only account they used. 23 A. Whatever etce I provided for that account? 24 Whatever etces I provide for that account? 25 and was usits to be transparent. We never had any other was one optices for them, you know, we had account? 26 and was usits to be transparent. We never had any other was an end them, you know, we had account? 25 and was usits to be transparent. We never had any other accounts for them, you know, we had account? 26 and was usits to be transparent. We never had any other accounts for them, you know, we had account? 27 and an tother merchans. 28 40. Q. Way. Now, there a tatements for that account? 29 and was account at CIBC A, Yes, It was not account at CIBC A, A and it was an account account account account and that account? 20 and an tother merchans. 21 bit this is the was no account at CIBC A, Yes, It was no account at CIBC A, Yes, It was no account at CIBC A, Yes, It was no account account account? 21 bit has is the was and account at CIBC A, Yes, It was no account account account? 22		2 Denait of Banners Broker. This was towards the fall	
5 A. So, Idont recall the amounts, but 6 there ween, i happend maybe once or twole, and 7 then it was over, and we had set up that BMO account 8 because CIBC was colling our accounts with 9 826. 0. I recall that from the first time, 10 that is right. So, apart from, there were four 11 accounts is CIBC, two US dollar and two Canadian. 12 A. Yes, it was only one account that 13 they used. Two US dollar and two Canadian. 14 837. Q. Right, and there was one pirmary 15 account is. 16 A. The primary account in the US side 17 was the only account they used. 18 38. Q. Wrich is the one that has the 19 account ware time if a dn mis 20 A. That is correct. 18 account submer is a trip 21 account submer is a count 22 nith two are low of account if a submer is a count			
6 the int was over, and we had set up that BMO accounts were, and we had set up that BMO accounts were, and we had set up that BMO accounts were, account as the primary account the interset were four that is only the were tour that is accounts and there was one primary account in the US side was the only account in the US side was the only account the used. 6 A In anticipation of closing those accounts at the were tour tansactions. 10 That is right. 845. Q. Right, okay. 9 A Yes. CIBC had given us, like, 90 diven us, like, 90 divent us, like, 90 diven us, like, 90 div			
7 then it was over, and we had set up that BMO account because CIG was Cosing our accounts with 7 accounts active were four accounts at CIGC, wo US dollar 9 886. Q. I recall that from the first time, accounts at CIGC, wo US dollar and two Canadian. 10 A. Yes, it was only one account that transactions. 845. Q. Right okay. 11 A. Yes, it was only one account that they used. You US dollar and two Canadian. 12 846. Q. So, just for here cord, then, as I 12 A. The primary account in the US side the account within's the one that has the account number identified on this 26 847. Qwitch was the primary account 18 38. Q. Within's the one that has the account number identified on this 18 7 A. That is correct. 19 account subtered for the account that use are looking at ngnt now, it ends in there was any account for some Canadian 2 20 A. Whatever deel provided for that 2 A. Whatever deel provided for that 2 A. Morgan - 192 11 for cheques. We had account for some Canadian 2 D, which is the one here that you 3 10 A. Clay, Now, there is acounts atterments 4 2 A. Yes. Margan - 192 1 0 che reques the ref had you 3 11 we had the tif the new as ref on the new that you 4			
8 because CIEC was closing our accounts with 9 845. 0. Fight oday, result has the fight of the second that is dift. 9 886. 0. I recall that from the first time, 9 A. Yes, CIBC had given us, like, 90 10 that is dift. 0. Fight oday, result of the account on unit transactions. 12 A. Yes, tiwas only one account that the was one primary account in the US side 10 understand it, to warp us what you said, you have given the receiver a complete set of IGE bank account ending in 16 A. The primary account in the US side 10 A. That is correct. 17 was the only account in the US side 10 A. That is correct. 10 18 838. 0. Which is the one that has the account number identified on this 10 A. That is correct. 10 21 39. 0. document hat we are looking at right, yut how, we had account 12 A. And it was understoot that that is what they gave me. 12 22 A. Whatever lese I provided for that as what hey gave me. 23 44. A. And it was understoot that that is what they gave me. 12 24 Dark was built to be transparent. We never had any otheracchants. 24 A. And it was			
 9 636. O. I recall that from the first time, we have four accounts at CBC, two US dollar 12 A. Yes, Tiwas only one account that account at CBC, two US dollar and two Canadian. 14 837. O. Right, and there was one primary account in the US side was the only account flay used. 838. O. Which is the one that has the account merit in first. 18 838. O. Which is the one that has the account flay used. 19 account, they used. 10 account it is right. 19 account it is right. 19 account it is right. 10 A. That is first. 11 account it is right. 12 account it is right. 13 account it is right. 14 839. Odocument that we are looking at right new. (hends in merchands). 14 bark was just to be transparent. We never had any other accounts for them, you know, we had account for some Canadian. 14 bark was isist to be transparent. We never had any other accounts for them, you know, we had account for some Canadian. 10 account is the ney number is a couple is set of bark. 11 are separate from this one. And the first one ends in 15112. 12 business we did, effectera, for other merchants. 13 action grammation of the account statements for that is what account? 14 account? 15 account is the ney to be account statements for that but we are missing statements for that, but we are missing statements for that, but we are first one ends in 15112. 15 account? 16 account? 17 batter account is an end at the up on the account statements for that account? 18 account? 19 account account statements for that account? 19 account account statements for that but we are missing statements for bark account is the mere for a second. 10 are only one page. So, we just want to be sure that is a count account statements for that account? 10 are only one page. So, we just want to be sure tha			
10 that is right. So, apart from, there were four accounts at CIBC, two US dollar 10 days or something like that, to taper dolwn our transactions. 12 A. Yes, it was only one account that they used. 13 they used. 264. So, just for the record, then, as I understand ft, to way up what you said, you have given the receiver a complete sol CIBC bank account statements for the account ending in the US side account number identified on this 17 was the only account they used. 18 18 0. Which is the one that has the account number identified on this 18 19 account number identified on this 18 47. 20 A. That is orget. 18 47. 21 839. Odocument that we are looking at tript now it most or DBC. and Tasked for the tup gave me. 22 A. Whatever else I provided for that ta we are looking at tript now it work now, we had account 24 A. And it was understood that that is what was available. 24 bank was just to be transparent. We never had any usines we did, etcetra, for other merchants. 24 A. And it was understood that that is one that we are provided us with a complete set of account at CIBC. 3 840. O. Now, have an account at CIBC 550. G. A. and I am told that we haveyou have provided us on the here that you a	-		
11 accounds at CIBC, two US dollar 12 A. Yes, it was only one account that they used. Two US dollar and two Canadian. 14 837. O. Right, and there was one primary account? 15 account? 16 A. The primary account in the US side the one that has the account number identified on this 19 account? 20 A. That is right. 21 Base one think one that has the account number identified on this 22 right now, it ends in merchants. 23 A. Whatever else provided for that the base we did, ccletra, for other merchants. 24 bank was just to be transparent. We never had any other accounts for them, you know, we had account 25 other accounts for them, you know, we had account 26 A. Yes. 7 M. Morgan - 192 10 for cheques. We had account for some Canadian to business we did, ccletra, for other merchants. 28 A. Ware and the count statements for the calterokay, yes, the December 11 merchant in to be are that you and askee doll that we haveyou 26 A. Ware and the count statements for that account? 27 M. Morgan - 192 10 for cheques. We had account for the ther that you aco			
12 A. Yes, it was only one account that 13 12 846. Q. Sup if or the record, then, as 1 understand it, to wap up what you said, you have given the receiver a complete set of CBC bank account support on this. 16 A. The primary account in the US side 17 13 account mober identifies set of CBC bank account number identifies or the ison of them. 18 838. Q. Which is the one that has the account number identified on this 18 847. Qwhich was the primary account 20 A. That is right. 18 848. Q. Okay. 21 839. Qdocument that we are looking at right now, it ends in 847. Qwhich was understood that that is what was available. That is to with unet down. 23 A. Whatever else I provided for that 24 Whatever alse I provided for that you that accounts for them, you know, we had account 25 848. Q. Okay. Now, there is a couple of 14 for cheques. We had account of some Canadian 25 M. Morgan - 190 M. Morgan - 190 14 for cheques. We had account of some Canadian 26 M. Morgan - 190 M. Morgan - 192 14 have provided us with a complete set of Dank 5 statements for the you 4 A. Okay. 3840. Q. Way. I have a nobe here that you 4 A. Okay. M. Morgan - 192 <td></td> <td></td> <td></td>			
13 they used. 13 understand it, to virg up what you said, you have given the receiver a complete set of CIBC bank 14 837. Q. Right, and there was one primary account in the US side iiii account statements for the account statements for the account statements for the full year up until December 16 A. The primary account in the US side iiiiii account statements for the full year up until December 18 838. Q. Which is the one that has the account inumber identified on this iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii			
14 837. Q. Right, and there was one primary account? 15 account? account in the US side 16 A. The primary account in the US side 17 was the only account in the US side 18 838. Q. Which is the one that has the account number identified on this 20 A. That is right. 14 The is correct. 21 838. Q. Mine was the one that has the account number identified on this 18 21 A. That is right. 17 A. That is correct. 22 A. Whatever else I provided for that 24 A. A. And was understood that that is 23 A. Whatever else I provided for that 23 A. And was understood that that is 24 what was up offstood that that is 24 what was available. M. Morgan - 192 1 for cheques. We had account tor some Canadian 2 M. Morgan - 192 1 for cheques. We had account to the we are 3 M. Morgan - 192 2 for cheques. We had account statements for 4 </td <td></td> <td></td> <td></td>			
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16 A. The primary account they used. 17 was the only account they used. 18 838. C. Which is the one that has the account number identified on this 19 account number identified on this 20 A. That is right. 21 839. Cdocument that we are looking at right now, it ends in the US add that they gave me. 23 A. Whatever else I provided for that is the accounts for them, you know, we had account A. That is correct. 23 A. Whatever else I provided for that is the accounts for them, you know, we had account A. And it was understood that that is the account for some Canadian business we did, et cetera, for other merchants. 26 Infor cheques. We had account for some Canadian to business we did, et cetera, for other merchants. Infor cheques. We had account for some Canadian to business we did, et cetera, for other merchants. 3 840. O. Now, I have a note here that you have a note here that you have a note here that you have provided us with a complete set of tank. 4 have provided us with a complete set of tank. 5 5 statements for the primary account at ICEC 6 6 A. Yes. 850. Q. A. Okay. 7 841. A. The latterokay, yes, the December 12 10 <		15 account?	15 account statements for the account ending in
18 838. Q. Which is the one that has the account number identified on this 19 account number identified on this 10 A. That is former. 20 A. That is right. 20 and lasked for the fully ear up unlib locember 21 839. Q. document that we are looking at right now, it ends in 100000000000000000000000000000000000			16
18 838. 0. Which is the one that has the account number identified on this 19 account number identified on this 19 A. That is order. I went to CIBC, and I asked for the full year up until December 21 839. 0. document that we are looking at ight now, it ends in million importance in the full year up until December 23 A. Whatever else I provided for that is one was just to be transparent. We never had any other accounts for them, you know, we had account 2848. O. O. 24 bank was just to be transparent. We never had any other accounts for them, you know, we had account 2849. O. O. 25 Bank was just to be transparent. We never had any other accounts for them, you know, we had account 26 849. O. O. 26 for cheques. We had account for some Canadian business we did, et celera, for other merchants. 9 A. A. M. Morgan - 192 1 thar a separate form this one. And the first one ends in 15112. 4 A. O. O. A. 26 A. Yes. M. M. M. M. M. M. 27 fatt. G. M. M. M. M. M. M. <td></td> <td>17 was the only account they used.</td> <td></td>		17 was the only account they used.	
20 A. That is right. 21 839. Qdocument that we are looking at right mow, it ends in for right mow, it ends in for right mow it ends in for right mow we had account 23 23 A. Whatever else I provided for that 24 bank was just to be transparent. We never had any 25 284. Q. Okay. 24 bank was just to be transparent. We never had any 25 24 A. And it was understood that that is 24 25 other accounts for them, you know, we had account 24 what was available. That is how it went down. 26 for cheques. We had account for some Canadian 2 business we did, et cetera, for other merchants. 3 840. Q. Now, have a nothe here that you 4 have provided us with a complete set of bank 4 4 have provided us with a complete set of bank 4 550. Q. And I am told that we haveyou 6 6 A. Yes. 550. Q. And I am told that we haveyou 6 7 841. Qwhich is the one that we are 6 missing statements for The firmary account at CIBC 9 latter part of 2012, some of the account statements for 12 hat account? 13 A. The latterokay, yes, the December 13 hat account? 14 record for a second. 11 15 842. MR. WARD: And just let me go off the record for a			
21 839. Q. document that we are looking at right now, it ends in Site i			
22 right now, it ends in register is a count of the masparent. We never had any other accounts for them, you know, we had account 23 A. And it was understood that that is the with wend down. 23 A. Whateverelse provided for that barsparent. We never had any other accounts for them, you know, we had account 23 A. And it was understood that that is the with wend down. 24 bank was valiable. That is how it went down. 24 what was available. That is how it went down. 25 other accounts for them, you know, we had account 24 what was available. That is how it went down. 26 for cheques. We had account for some Canadian 2 business we did, et cetera, for other merchants. 840. Q. Now, I have a note here that you have provided us with a complete set of bank 4 A. Okay. 9 3 840. Qwhich is the one that we are looking at. ending in met. However, for the latter part of 2012, some of the account statements for that account? 4 A. Okay. 7 841. Qwhich is the one that we are looking at. ending in met. However, for the account? 5 850. Q. And I ant hold that we haveyou have provided some statements for that, but we are missing statements for that account? 7 841. Q. Way. Discover, for the account statements for that account? 10 are only one page. So, we just want to be sure that it we have a complete set of account statements for that account? 4 A. O			
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11we have a complete set of account statements for12that account?13A. The latterokay, yes, the December14statements.15842. MR. WARD: And just let me go off the16record for a second.171618 DISCUSSION OFF THE RECORD192020THE DEPONENT: We were told that our21accounts were coming to an end at the time,22I believe. So, activity slowed down. If23we had other business with other clients,24we had them fund elsewhere.			
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22I believe. So, activity slowed down. If22which hadnothing to do with23we had other business with other clients,23851.Q.So, then, is it24we had them fund elsewhere.24ABanners Broker.			
23 we had other business with other clients, 24 we had them fund elsewhere. 24 ABanners Broker.		22 I believe. So, activity slowed down. If	22 which had nothing to do with
24 we had them fund elsewhere. 24 ABanners Broker.		23 we had other business with other clients,	23 851. Q. So, then, is it
25 Q. So we are clear, then, it is your		24 we had them fund elsewhere.	24 ABanners Broker.
		25	25 852. Q. So we are clear, then, it is your

	Sheet 10 Page 34		Page 36
	M. Morgan - 193		M. Morgan - 195
1	evidence that, for the October to December 2012	1	BY MR. WARD:
2	period with respect to the account ending in 15112,	2	862. Q. So, Max, if we could look, again, at
3	you have looked and there was no Banners	1 3	undertaking 2 on the list of undertakings?
1 A	Broker-related activity?	4	A. Yes?
5	A. There was never any Banners	5	863. Q. It is actually a spreadsheet that we
	Broker-related activity.	6	have asked for, an Excel spreadsheet which details
67			all funds received from Banners Broker. And if I
	853. Q. Okay. And then the next CIBC	8	
8	account ends in 019.		have understood you correctly, all of the funds that
9	A. It is Canadian.	9	you have received from Banners Broker during the
10	854. Q. And similarly, the indication I have		period that you were associated with them would have
11	heard is that we are missing the statements from		gone into this CIBC
12	December 2012, but we have the rest of the	12	A. Yes, and for a short period of time,
13	statements.	13	maybe about a month or so, BMO. There was maybe one
14	A. Yes. So, that account we ceased	14	or two transactions that went into BMO after we
15	using probably November, that is probably why.	15	closed our CIBC account.
16	There wasn'tI mean, if CIBC provided a statement,	16	864. Q. Okay. And just so I amwere there
17	it would just say zero or "no activity". We didn't	17	any other accounts anywhere in the world that Aramor
18	do anything on that account after a certain period	18	maintained that Banners Broker might have sent, or
19	of time. That was a Canadian account, had nothing	19	its affiliates might have sent funds to?
20 21	to do with Banners, as well.	20	A. No, not that we would have
21	855. Q. And then finally, there is an	21	maintained. So, we haveyou know, we set them up
22	account that ends in	21	with alternative relationships with other
23	A. Yes, also Canadian, same story. One	23	processors, vendors, et cetera. So, if they were to
24	was an operating account for Aramor, the otheryou	24	fund those accounts, that had nothing to do with us.
25	know, so we pay our taxes out of that, et cetera.	25	We might help with the bookkeeping or the management
	Dago 35		
	Page 35	1	Page 37
	M. Morgan - 194		M. Morgan - 196
1	M. Morgan - 194 The other was Canadian cheques that we did for a	1	M. Morgan - 196 of how they are going to do it, or administer it,
1	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did	1	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts.
1 2 3	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to	1	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the
1 2 3 4	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end,	1 2 3 4	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at
1 2 3	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally.	1	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab
1 2 3 4 5 6	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally.	1 2 3 4 5 6	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes?
1 2 3 4	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally.	1 2 3 4 5 6 7	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes? 866. Qis this the spreadsheet that you
1 2 3 4 5 6 7	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally. 856. Q. So, what you are telling me is there was no Banners Broker-related A. No, none.	1 2 3 4 5 6 7 8	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes?
1 2 3 4 5 6 7 8 9	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally. 856. Q. So, what you are telling me is there was no Banners Broker-related A. No, none. 857. Qactivity in that account at any	1 2 3 4 5 6 7 8 9	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes? 866. Qis this the spreadsheet that you believe sets out thedetails all funds received from
1 2 3 4 5 6 7 8 9 10	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally. 856. Q. So, what you are telling me is there was no Banners Broker-related A. No, none. 857. Qactivity in that account at any point in time?	1 2 3 4 5 6 7 8 9 10	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes? 866. Qis this the spreadsheet that you believe sets out thedetails all funds received from A. I believe there is more from them,
1 2 3 4 5 6 7 8 9 10 11	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally. 856. Q. So, what you are telling me is there was no Banners Broker-related A. No, none. 857. Qactivity in that account at any point in time? A. No, we just provided those accounts,	1 2 3 4 5 6 7 8 9 10 11	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes? 866. Qis this the spreadsheet that you believe sets out thedetails all funds received from A. I believe there is more from them, their companies. It is what we could initially
1 2 3 4 5 6 7 8 9 10 11	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally. 856. Q. So, what you are telling me is there was no Banners Broker-related A. No, none. 857. Qactivity in that account at any point in time? A. No, we just provided those accounts, just to be transparent.	1 2 3 4 5 6 7 8 9 10 11 12	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes? 866. Qis this the spreadsheet that you believe sets out thedetails all funds received from A. I believe there is more from them, their companies. It is what we could initially find, given the time period we had to provide it.
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1 3 4 5 6 7 8 9 10 11 12 13 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 5 16 7 10 10 10 10 10 10 10 10 10 10 10 10 10	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally. 856. Q. So, what you are telling me is there was no Banners Broker-related A. No, none. 857. Qactivity in that account at any point in time? A. No, we just provided those accounts, just to be transparent. 858. Q. Okay. A. Because those were accounts we had. 859. Q. And just to remind everyone, when I say Banners Broker, I am referring to A. Monitise and all the other ones, sure. 860. QStellar Point, all of the Banners Broker	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes? 866. Qis this the spreadsheet that you believe sets out thedetails all funds received from A. I believe there is more from them, their companies. It is what we could initially find, given the time period we had to provide it. 867. Q. Okay. A. So 868. Q. Okay. A. Yes. 869. Q. So, can we leave it this way, then? Because I am going to take you to some specific examples, where A. Sure. 870. QGillian and Erin have found some
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1 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 13 14 5 16 7 10 10 10 10 10 10 10 10 10 10 10 10 10	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally. 856. Q. So, what you are telling me is there was no Banners Broker-related A. No, none. 857. Qactivity in that account at any point in time? A. No, we just provided those accounts, just to be transparent. 858. Q. Okay. A. Because those were accounts we had. 859. Q. And just to remind everyone, when I say Banners Broker, I am referring to A. Monitise and all the other ones, sure. 860. QStellar Point, all of the Banners Broker A. Correct. 861. MR. WARD:related companies, okay.	1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 1 12 1 12 1 12 1 12 1 12 1 12 1 12	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes? 866. Qis this the spreadsheet that you believe sets out thedetails all funds received from A. I believe there is more from them, their companies. It is what we could initially find, given the time period we had to provide it. 867. Q. Okay. A. So 868. Q. Okay. A. Yes. 869. Q. So, can we leave it this way, then? Because I am going to take you to some specific examples, where A. Sure. 870. QGillian and Erin have found some indication from the Banners Broker accounts that
1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 13 14 5 16 7 10 10 10 10 10 10 10 10 10 10 10 10 10	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally. 856. Q. So, what you are telling me is there was no Banners Broker-related A. No, none. 857. Qactivity in that account at any point in time? A. No, we just provided those accounts, just to be transparent. 858. Q. Okay. A. Because those were accounts we had. 859. Q. And just to remind everyone, when I say Banners Broker, I am referring to A. Monitise and all the other ones, sure. 860. QStellar Point, all of the Banners Broker A. Correct.	1 2 3 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 14 5 6 7 8 9 0 11 12 3 14 5 6 7 8 9 0 11 12 3 14 5 6 7 8 9 0 11 12 13 14 5 6 7 8 9 0 11 12 13 14 5 16 7 8 9 0 11 12 13 14 15 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes? 866. Qis this the spreadsheet that you believe sets out thedetails all funds received from A. I believe there is more from them, their companies. It is what we could initially find, given the time period we had to provide it. 867. Q. Okay. A. So 868. Q. Okay. A. Yes. 869. Q. So, can we leave it this way, then? Because I am going to take you to some specific examples, where A. Sure. 870. QGillian and Erin have found some indication from the Banners Broker accounts that there may have been money sent to Aramor that is not
1 2 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 13 14 5 16 7 10 10 10 10 10 10 10 10 10 10 10 10 10	M. Morgan - 194 The other was Canadian cheques that we did for a company. So, yes, there was noBanners Broker did everything in U.S. dollars, and anything that was to be converted was done at the customer's end, generally. 856. Q. So, what you are telling me is there was no Banners Broker-related A. No, none. 857. Qactivity in that account at any point in time? A. No, we just provided those accounts, just to be transparent. 858. Q. Okay. A. Because those were accounts we had. 859. Q. And just to remind everyone, when I say Banners Broker, I am referring to A. Monitise and all the other ones, sure. 860. QStellar Point, all of the Banners Broker A. Correct. 861. MR. WARD:related companies, okay.	1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 1 12 1 12 1 12 1 12 1 12 1 12 1 12	M. Morgan - 196 of how they are going to do it, or administer it, but they were not our accounts. 865. Q. So, just with reference to the undertaking number 2, and the sheet that we have at tab D before the blue tab A. Yes? 866. Qis this the spreadsheet that you believe sets out thedetails all funds received from A. I believe there is more from them, their companies. It is what we could initially find, given the time period we had to provide it. 867. Q. Okay. A. So 868. Q. Okay. A. Yes. 869. Q. So, can we leave it this way, then? Because I am going to take you to some specific examples, where A. Sure. 870. QGillian and Erin have found some indication from the Banners Broker accounts that

			. 6	17
	Sheet 11 Page 38		Page 40	
	M. Morgan - 197		M. Morgan - 199	
	871. Q. So, why don't we just get an		A. Sure, I would hope so, yes. 878. Q. Okay.	
23	undertaking number 2, which I think we already have, to give you a chance to go back, if you could, or		A. Why not?	
4	Tricia		879. Q. Okay, thank you for that. And just	
5	A. Okay.	4 5	while we are at tab D, before you close tab D,	
6	872. Qand just check that this is	6	behind the blue sheet, there is another document,	
7	complete, that we have a complete statement from	7	which I said we have compared to the first one, and	
8	Aramor's records of all monies received by Banners	8	they are differentcan you just describe for me	
9	Broker. Can you	9	what yourself or Tricia were doing here?	
10 11	A. I can do that. 873. Q. Thank you. So, that is undertaking	111	A. Right behind the blue sheet? 880. Q. Right behind the blue sheet. And	
12	number 2 on Exhibit M1.	12	you will see that they are different when you look,	
13	A. Okay. U/T	13	for instance, at the first two line items, the	
14	874. Q. And then similarly, the flip side of	14	Monitise entries? The second item ison the	
15	the coin is we are also looking to get a a complete	15	document before the blue sheet is \$149,000 receipt	
16	statement of all funds sent to either the	16	whereas on the document after the blue sheet, there	
17 18	corporations, Banners Broker corporations, or the principals, Smith, Dixit, and Joseph, or the	17	is \$29,000. A. Yes, I am not sure. There was	
19	affiliates by Aramor, and is that something, Max,	19	obviously some sort of mixup or discrepancy because	
20	that you or Tricia could prepare and give to us?	20	there is the \$29,000 on the first sheet, too, but	
21	A. Yes. And just so I understand, for	21	there is two of them here on thisafter the blue	
22	the record, there are funds that we have sent on	22	sheet. So, I am not sure. We would have to go back	
23	their behalf to third parties that might not have	23	and retrace our steps.	
24 25	been affiliated with any of these guys, or their companies that may have turned around after, and	24	881. Q. Okay. And I believe I have that. A. I am assuming it is probably an	
120	companies that may have turned abound after, and	1140		
		J		
	Page 39]	Page 41 M. Morgan - 200	
1	M. Morgan - 198 Sent it to their companies, you know, in terms of	1	Page 41 M. Morgan - 200 error, or	
1	M. Morgan - 198 Sent it to their companies, you know, in terms of just rerouting money. And that is not something we	1 2	Page 41 M. Morgan - 200 error, or 882. Q. Sure.	
1 2 3	M. Morgan - 198 Sent it to their companies, you know, in terms of just rerouting money. And that is not something we would know, necessarily. We havesometimes, we	1	M. Morgan - 200 error, or 882. Q. Sure. Awe just omitted something. I am	
1 2 3 4	M. Morgan - 198 Sent it to their companies, you know, in terms of just rerouting money. And that is not something we would know, necessarily. We havesometimes, we get instructions to pay vendors. And if we pay a	1 2 3 4	M. Morgan - 200 error, or 882. Q. Sure. Awe just omitted something. I am not sure.	
1 2 3 4 5	M. Morgan - 198 Sent it to their companies, you know, in terms of just rerouting money. And that is not something we would know, necessarily. We havesometimes, we get instructions to pay vendors. And if we pay a vendor, and it is another payment company or another	1 2 3 4 5	M. Morgan - 200 error, or 882. Q. Sure. Awe just omitted something. I am not sure. 883. Q. So, we will leave that with you,	
1 2 3 4	Rage 39 M. Morgan - 198 sent it to their companies, you know, in terms of just rerouting money. And that is not something we would know, necessarily. We havesometimes, we get instructions to pay vendors. And if we pay a vendor, and it is another payment company or another company that is not affiliated with any of that we	1 2 3 4	M. Morgan - 200 error, or 882. Q. Sure. Awe just omitted something. I am not sure.	
1 2 3 4 5 6 7 8	Rage 39 M. Morgan - 198 sent it to their companies, you know, in terms of just rerouting money. And that is not something we would know, necessarily. We havesometimes, we get instructions to pay vendors. And if we pay a vendor, and it is another payment company or another company that is not affiliated with any of that we see here, it could be assumed that that money was used to move money elsewhere. I am sure there are	1 2 3 4 5 6 7 8	M. Morgan - 200 error, or 882. Q. Sure. Awe just omitted something. I am not sure. 883. Q. So, we will leave that with you, then, and I think it is A. Sure. 884. Qincluded within the broader	
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	 Page 39	1 2 3 4 5 6 7 8 9 10 11 12 13 14 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22 23	 Page 41 M. Morgan - 200 error, or 882. Q. Sure. Awe just omitted something. I am not sure. 883. Q. So, we will leave that with you, then, and I think it is A. Sure. 884. Qincluded within the broader undertaking. A. I will clear that up. U/T 885. Q. Thank you. Now, just back with our undertakings chart, I am at number 4, Max, on the A. Yes, okay. 886. Q. You described for us, on April the 13th, how there was a BMO account that was used for purposes of EFT payments. A. Yes? 887. Q. And justcan you explain for me again what you mean by an EFT payment? A. It is a direct deposit to your bank account. So, if you have a Canadian bank account, you can either debit or credit that account through the mechanism of EFT, electronic funds transfer. 	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Page 39	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22	Page 41 M. Morgan - 200 error, or 882. Q. Sure. A. we just omitted something. I am not sure. 883. Q. So, we will leave that with you, then, and I think it is A. Sure. 884. Q. included within the broader undertaking. A. I will clear that up. U/T 885. Q. Thank you. Now, just back with our undertakings chart, I am at number 4, Max, on the A. Yes, okay. 886. Q. You described for us, on April the 13th, how there was a BMO account that was used for purposes of EFT payments. A. Yes? 887. Q. And justcan you explain for me again what you mean by an EFT payment? A. It is a direct deposit to your bank account. So, if you have a Canadian bank account, you can either debit or credit that account through	

_	_ Sheet 12 Page 42		Page 44 61
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	M. Morgan - 201 889. Q. And that was done strictly in Canada, correct? A. Yes. 890. Q. And it was doneI further understand that it was done through an affiliate company of Aramor, which you identified as 2319639 Ontario Limited? A. That is correct. 891. Q. And what was the business of that company, 231? A. It was just to disburse EFTs. 892. Q. So, can we get from you, thenand there may not have been a lot of EFTs, but we would like a complete statement of all of the EFT payments that were A. Sure. 893. Qthat Aramor or 2319639 Ontario Limited affected for Banners Broker.	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 10 7 8 9 10 11 2 3 4 5 10 7 8 9 10 11 2 3 4 5 10 7 8 9 10 11 12 10 10 10 10 10 10 10 10 10 10 10 10 10	M. Morgan - 203 So, you will confirm that? A. Yes. 899. Q. And then over the page, number 6, similarly you were going to provide the receiver with complete and, presumably, signed copies of the agreements between Aramor and Beanstream and Aramor Allied Wallet A. Sure. U/T 900. Qwith respect to Banners Broker? Thank you for that. A. Okay. 901. Q. And then undertaking number 7 A. Okay. 902. Qthere were some commission statements from Allied Wallet to Aramor Payments in connection with the payment processing services, and supplied to Banners Broker, and I wanted to confirm, as well, that you can provide those to us?
19 20 21 22 23 24 25	A. Okay. U/T 894. Q. Thank you. Maybe the easiest way to get that to us would be to produce the account statements for 231's account at the Bank of Montreal. Is that the way you A. We will try. I would have to petition one of the corporate offices to do it, and	20 21 22 23 24 25	A. Yes, we can do that. U/T 903. Q. Thank you. And then number 8? A. Yes, we can do that, too. U/T 904. Q. Thank you for that. And number 9, let me just consider this, because we may have covered it. I think we have dealt with number 9 A. We have covered that. It is one
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 33 24 25	 M. Morgan - 202 I don't know what their protocol is. I had a very good relationship with CIBC. So, I can walk to the branch and talk to the business tellers there. They were able to order it for me because I was friendly with them, but I don't know how BMO willhow fast they will act or what they will do. This specific EFT account was set up in Vancouver, so 895. Q. Would you be prepared to authorize the receiver to make that request on your behalf with a copy of thewhatever they produce going to yourself as well as to their receiver? A. I would like to attempt first, but, yes, I will permit it. 896. Q. Okay. So, let'sagain, a two-step process. If you could attempt first, thank you for that. And then the next few get a littlethe next few undertakings, Max, get a little easier. A. Okay. 897. Q. Number 5, I just wanted to confirm that we had agreed when we last met that you could provide me with a complete copy of the agreement between Aramor Payments and Banners Broker? A. Yes. 898. Q. And we have a copy, but it was missing the schedules and it wasn't signed. Okay. 	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	M. Morgan - 204 specific account that you want to know where funds were sent to or from to any of the corporations? 905. Q. Well, yes, and assumingfrom what you have told us, there was only one specific account at CIBC, plus the BMO A. That is correct. 906. Qtowards the end. So, this undertaking number 9 is presumably captured in the answers to undertakings number 2 and 3. A. That is correct. 907. Q. Okay. And then finally, undertaking number 10. There was a BMOanother BMO account at First Canadian Place? A. That is correct. 908. Q. That was established in around November 2012, after CIBC shut Aramor's accounts. And you use that a little bit for Banners Broker, correct? A. Yes, we did. I can provide statements for that for November 2012, and possibly December, as well, for what they did. 909. Q. Sure. And we are only interested inwell, what we are interested in is statements for that account that document Banners Broker-related activity, regardless of the time

	Sheet 13 Page 46	_	Page 48
	M. Morgan - 205		M. Morgan - 207
1 4		1	Aramor, is Cambridge Mercantile Group
	period.		Aramor, is Cambridge Mercandre Croup
2	A. Okay. U/T	23	essentiallyis it a company? Is it another one of
3	910. Q. Thank you. Okay. So, I want to	3	your companies?
4	look further at the little brief of documents that	4	A. Yes. It is not one of my companies,
5	is tabbed and loose.	5	no. Cambridge is a huge FX broker on King Street,
6	A. Okay.	4 5 6 7	so they serve a lot of different companies. But we
7	911. Q. And behind tab A, there is reference		had an account with them to be able to receive funds
8	to a \$300,000 amount that was paid from Monitise	8	from our clients and vendors, and to be able to send
	Croup's appoint at Chaiga Park to an antity called		
9	Group's account at Choice Bank to an entity called	9	funds out, as well.
10	Cambridge Mercantile Corp	10	920. Q. I see. And there is an account
11	A. Sorry, what number is that?	11	number on this, and you will see it as ending in
12	912. Q. It is just tab A.	12	1636? Was that the Aramor account at
13	A. Tab A?	13	A. No, we never had a specific account.
14	913. Q. You will see a form there.	14	They have their own accounts, and what we have is
15	A. Okay.	115	some sort of ID that is attached. So, if clients
16	914. Q. So, as I read this, there was a	16	send funds for us, they can quote that in the
17	\$300,000 amount that was paid from a Monitise Group	17	notation, and then we would receive the funds.
18		18	
	incorporated account		921. Q. Okay. And what happened to the
19	A. Yes.	19	funds after they made it intohow can we trace the
20	915. Qwhich we understand was at Choice	20	\$300,000
21	Bank, to a beneficiary by the name of Cambridge	21	A. You would have to trace
22	Mercantile Corp., that banked at the Bank of	22	922. Qbeyond Bank of America?
23	America, New York.	23	A. You would have to trace it through
24	A. Yes.	24	Cambridge. So, what happened is Cambridge got the
25	916. Q. And can you tell me, is Cambridge	25	funds. These guys, Banners, sent us the
L	, , , , , , , , , , , , , , , , , , , ,		
	Page 17		Bago 19
	Page 47 M Morgan 206	1	Page 49 M. Morgon 209
4	M. Morgan - 206		M. Morgan - 208
1	M. Morgan - 206 Mercantile Corp. associated with Aramor?		M. Morgan - 208 instructions. The instructions were to disburse X
1 2	M. Morgan - 206 Mercantile Corp. associated with Aramor? A. Yes. So, we had FX account there,	1 2	M. Morgan - 208 instructions. The instructions were to disburse X number of funds. What had happened is we gotsome
3	M. Morgan - 206 Mercantile Corp. associated with Aramor? A. Yes. So, we had FX account there, that some of our clients funded. We have a lot of	3	M. Morgan - 208 instructions. The instructions were to disburse X number of funds. What had happened is we gotsome of the funds went to Ireland, which was really
3	M. Morgan - 206 Mercantile Corp. associated with Aramor? A. Yes. So, we had FX account there, that some of our clients funded. We have a lot of clients in Europe. We had some in Asia, as well.	3	M. Morgan - 208 instructions. The instructions were to disburse X number of funds. What had happened is we gotsome of the funds went to Ireland, which was really 923. Q. Some of these \$300,000?
3 4 5	M. Morgan - 206 Mercantile Corp. associated with Aramor? A. Yes. So, we had FX account there, that some of our clients funded. We have a lot of	3	M. Morgan - 208 instructions. The instructions were to disburse X number of funds. What had happened is we gotsome of the funds went to Ireland, which was really
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3 4 5 6	M. Morgan - 206 Mercantile Corp. associated with Aramor? A. Yes. So, we had FX account there, that some of our clients funded. We have a lot of clients in Europe. We had some in Asia, as well. What had happened was Banners Broker wanted to be able to send direct deposit payments orin Europe,	3 4 5 6	M. Morgan - 208 instructions. The instructions were to disburse X number of funds. What had happened is we gotsome of the funds went to Ireland, which was really 923. Q. Some of these \$300,000? A. Yes. However, the country code that was typed in was Iran. And, so, that raised flags
3 4 5 6 7	M. Morgan - 206 Mercantile Corp. associated with Aramor? A. Yes. So, we had FX account there, that some of our clients funded. We have a lot of clients in Europe. We had some in Asia, as well. What had happened was Banners Broker wanted to be able to send direct deposit payments orin Europe, called SEPA, through Cambridge, or they asked us if	3 4 5 6 7	M. Morgan - 208 instructions. The instructions were to disburse X number of funds. What had happened is we gotsome of the funds went to Ireland, which was really 923. Q. Some of these \$300,000? A. Yes. However, the country code that was typed in was Iran. And, so, that raised flags accidentally, and that is when we started to get
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	M. Morgan - 206 Mercantile Corp. associated with Aramor? A. Yes. So, we had FX account there, that some of our clients funded. We have a lot of clients in Europe. We had some in Asia, as well. What had happened was Banners Broker wanted to be able to send direct deposit payments orin Europe, called SEPA, through Cambridge, or they asked us if we could facilitate it. We told them we can't do it directly, but it would have to go through Cambridge. They may have funded more than once, but I think it was only once, and then Cambridge came back to us and said, you know, "You operated on behalf of a third party, or your clients. These guys are going to have to set up an account directly with us". And, so, we proceeded to attempt to do that and were not successful. But, yes, this might have happened once or twice, as far as I know. 917. Q. Okay. So, it appears that it happened in this instance. A. M'hmm. 918. Q. And just so I amcan you check and let us know if it happened in any other instances? A. Yes, I can check. U/T	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 23	 M. Morgan - 208 instructions. The instructions were to disburse X number of funds. What had happened is we gotsome of the funds went to Ireland, which was really 923. Q. Some of these \$300,000? A. Yes. However, the country code that was typed in was Iran. And, so, that raised flags accidentally, and that is when we started to get into hot water with Cambridge, and they said they need to set up their own account, because they clearly knew it was out of our regular pattern. We never really sent a lot of payments to Ireland orand never to Iran, obviously. So 924. Q. Okay. So, what we are trying to do is find out what happened to the \$300,000 beyond this point in time. A. It got disbursed. It got disbursed based on whatever their instructions were. 925. Q. Okay. A. And I can't say that it was just micropayments. It might have been larger payments, too, but Banners sent instructions, we remitted those instructions over to Cambridge, and Cambridge acted on them.

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	Sheet 14 Page 50		Page 52
	M. Morgan - 209		M. Morgan - 211
1	own records	1	A. Yes.
2	A. Sure.	2	940. Q. This receipt doesn't appear on the
3	927. Qcan you please give us an	3	receipt listing that Tricia had prepared, and you
4	accounting for what happenedwhere that \$300,000	4	had given to us earlier.
			A I den't think it was about to har
5	went?	5	A. I don't think it was clear to her,
6	A. Sure. U/T	6	necessarily, who it was from or where it was from
7	928. Q. Thank you. And then the next item	7	initially. And I had given her a list of names of
8	in this brief is a \$200,000 amount, and you will see	8	companies, et cetera, to look for. So, it was easy
9	this behind tab B. That was, again, transferred	9	for her tolike tobypass this.
10	from monetized group account at Choice Bank?	10	941. Q. Okay.
11	A. Yes.	111	A. She wouldn't have hidden it, because
12	929. Q. To a Bank of Montreal account of	12	she knew that we had the and you guys have all the
13	Aramor.	13	statements, so
10			
14	A. Yes.	14	942. Q. Okay.
15	930. Q. In February of 2013.	15	Ait is probably just an oversight.
16	A. Okay.	16	943. Q. Understood.
17	931. Q. And this would have been the First	17	A. I can certainly get some more detail
18	Canadian Place?	18	on it.
19	A. That is accurate.	19	944. Q. As long as it is included in the
20	932. Q. Okay. And	20	revised, sort of, comprehensive receipts
20 21	A. That was after our CIBC accounts	21	disbursement summaries, that would be fine. And
22	were closed.	22	then, if we look behind tab E in the same brief,
22 23	933. Q. Right.	23	there is a few entries I want to take you to that
24	A. I thinkI don't believe those were	24	the receiver is interested in. It looks like there
25		25	were three transfers to Stellar Point, that were
20	necessarily disbursements that we did. I think	120	were three transfers to otenar i onit, that were
·			
·	Page 51 010		Page 53
	M. Morgan - 210		Page 53 M. Morgan - 212
1	M. Morgan - 210 those funds were sent to us, and then off to	1	M. Morgan - 212 made in the summer of 2012.
2	M. Morgan - 210 those funds were sent to us, and then off to Payoneer, or we were to remit those funds elsewhere	1	M. Morgan - 212 made in the summer of 2012. A. Right.
	M. Morgan - 210 those funds were sent to us, and then off to	1 2 3	M. Morgan - 212 made in the summer of 2012. A. Right. 945. Q. And the first one you see, on the
23	M. Morgan - 210 those funds were sent to us, and then off to Payoneer, or we were to remit those funds elsewhere	1 2 3 4	M. Morgan - 212 made in the summer of 2012. A. Right.
23	M. Morgan - 210 those funds were sent to us, and then off to Payoneer, or we were to remit those funds elsewhere in a large lump sum. So, we didn't do a bunch of micropayments ourselves.	1 2 3	M. Morgan - 212 M. Morgan - 212 M. Morgan - 212 A. Right. 945. Q. And the first one you see, on the first page, it is an \$80,000 entry A. Right.
2 3 4 5	M. Morgan - 210 those funds were sent to us, and then off to Payoneer, or we were to remit those funds elsewhere in a large lump sum. So, we didn't do a bunch of micropayments ourselves. 934. Q. Okay. But you either	1 2 3 4 5	M. Morgan - 212 M. Morgan - 212 M. Morgan - 212 A. Right. 945. Q. And the first one you see, on the first page, it is an \$80,000 entry A. Right.
2 3 4 5 6	M. Morgan - 210 those funds were sent to us, and then off to Payoneer, or we were to remit those funds elsewhere in a large lump sum. So, we didn't do a bunch of micropayments ourselves. 934. Q. Okay. But you either A. I can get you details on that.	1 2 3 4	M. Morgan - 212 made in the summer of 2012. A. Right. 945. Q. And the first one you see, on the first page, it is an \$80,000 entry A. Right. 946. Qand the indication there is "Comm
2 3 4 5 6 7	M. Morgan - 210 those funds were sent to us, and then off to Payoneer, or we were to remit those funds elsewhere in a large lump sum. So, we didn't do a bunch of micropayments ourselves. 934. Q. Okay. But you either A. I can get you details on that. 935. Q. Well, yes, thank you. And I	1 2 3 4 5 6 7	M. Morgan - 212 made in the summer of 2012. A. Right. 945. Q. And the first one you see, on the first page, it is an \$80,000 entry A. Right. 946. Qand the indication there is "Comm cash debit". And we talked a little bit about this
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 10 11 12 13 14 15 6 7 8 9 10 11 20 21 22	M. Morgan - 210 those funds were sent to us, and then off to Payoneer, or we were to remit those funds elsewhere in a large lump sum. So, we didn't do a bunch of micropayments ourselves. 934. Q. Okay. But you either A. I can get you details on that. 935. Q. Well, yes, thank you. And I willfor the record, we would like an undertaking as toso, with information sufficient to determine the disposition of those funds beyond the Bank of Montreal. And it may bebecause you have told us that we can have the relevant Bank of Montreal statements, that just by looking at the statements, we can figure out how the money A. Sure. 936. Qwas disbursed on. A. Okay. U/T 937. Q. And then the next tab is tab C A. Okay. 938. Qand you will see that, on September the 3rd, 2012, is this highlighted for A. It is.	1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 2 3 4 5 6 7 8 9 20 11 2 3 4 5 6 7 8 9 20 11 2 3 4 5 6 7 8 9 20 11 2 3 4 5 6 7 8 9 20 11 2 3 4 5 6 7 8 9 20 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 14 5 10 11 12 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	 Page 53 M. Morgan - 212 made in the summer of 2012. A. Right. 945. Q. And the first one you see, on the first page, it is an \$80,000 entry A. Right. 946. Qand the indication there is "Comm cash debit". And we talked a little bit about this on April the 13th, but remind me: What is your understanding of a comm cash debit? A. I think it is justit is a transfer within the branch. So, we didn't have to wire the funds necessarily, because Stellar Point should have had an account at the same branch. From what I recall, I did the introductions 947. Q. Right. Afor them to get an account there, so 948. Q. So, you believe that to just indicate that there was an intra-bank transfer A. Right, of their own funds, and from what I understand, I know that Stellar Point had a large commercial property, and they had a staff of

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			Page 56
	Sheet 15 Page 54 M. Morgan - 213		M. Morgan - 215
4	consistent. So, I said, "Okay, sure. We will	11 1	A. I would prefer to leave Lyndon out
			of this. What is Lyndon's relevance to this? And
23	transfer it. It is your money".		
	949. Q. Okay. And, please, if you can move	3	by that I don't mean he has anything to hide. He
4	forward to tab F?	4	doesn't, but he is a good friend. He went through a
5 6 7	A. Yes?	5	tough time. He left Aramor and went to Global
6	950. Q. There are five transfers from	6	Payments on my referral and recommendation, and he
7	Stellar Point that are documented in tab F.	7	was simply an account manager that did a good job
8	A. To Aramor?	8	setting them up with payments for Allied Wallet,
9	951. Q. To Aramor.	9	Beanstream and a couple of other companies. He
10	A. Okay.	10	would have no relevance to the money that you are
11	952. Q. And, again, I am told that these	111	looking for within Aramor as far as these
12	were not on the receipt summary that	12	statements, et cetera. He was never part of that
13		13	side of the business.
14 15	953. Q. Okay. So, if you could just make	114	
15	sure, then, that they	15	to speak to him for any reason. There is no plan to
16	A. It says Banners Broker Limited here,	116	pursue Lyndon or anything, or anyone else, for that
17	is this Banners Broker Canadathis is Banners	117	matter. We are just trying to figure out the flow
18	Broker, and then it changed to Stellar Point.	18	of funds. Now, if he is
19	954. Q. Correct.	19	A. He is a close family friend. Unless
20	A. Is that accurate?	20	it is by court order, I don't want to provide that.
21	955. Q. Yes. And, so, we just need towe	21	964. Q. And in the same vein, I know that
22	just want to if you could remind Tricia or whoever	22	there were a couple other people within your
23	to make sure	23	organization that did some Banners Broker work
24	A. Yes.	24	A. Yes.
25	956. Qthat these types of transfers are	25	965. Qand the other one, of course, is
	Page 55		Page 57
	M. Morgan - 214		M. Morgan - 216
11	included in the revised receipts disbursement	1	Tricia Edwards. Is she in the Philippines or
2	summary.	2	Canada?
3	A. Okay. U/T	3	A. Tricia is in Canada.
4	957. Q. Okay. And then similarly, tab G of	4	966. Q. Okay. And is she still with Aramor?
5	the same brief shows a receipt to your CIBC account	5	A. She is independently contracting,
6	from G Cube Media. And, again, this was also not		but yes.
7	included in Tricia's form.	6	967. Q. Okay. And, so, similarly, just in
		8	the event we needed it, could we get, please,
8	A. Yes, I don't think she was familiar		
9			contract information for Tricia Edwards? An o-mail
	with it.	9	contact information for Tricia Edwards? An e-mail
10	958. Q. Okay. But	10	address and a phone number?
11	958. Q. Okay. But A. We will include it. U/T	10	address and a phone number? A. Look, I don't mind bringing Tricia
11 12	958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G	10 11 12	address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I
11 12 13	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. 	10 11 12 13	address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that,
11 12 13 14	958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is.	10 11 12 13 14	address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer,
11 12 13 14 15	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI 	10 11 12 13 14 15	address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but
11 12 13 14 15 16	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good 	10 11 12 13 14 15 16	address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine.
11 12 13 14 15 16 17	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good progress, Max. A couple other housekeeping matters. 	10 11 12 13 14 15 16 17	 address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine. A. Yes, I don't want her operating
11 12 13 14 15 16 17 18	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good 	10 11 12 13 14 15 16 17 18	 address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine. A. Yes, I don't want her operating outside of that. And we run a business, and she is
11 12 13 14 15 16 17 18 19	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good progress, Max. A couple other housekeeping matters. Lyndon Burrell do you know wherewhere is Lyndon 	10 11 12 13 14 15 16 17 18 19	 address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine. A. Yes, I don't want her operating outside of that. And we run a business, and she is pretty busy. So, you know, she will help me get the
11 12 13 14 15 16 17 18 19 20	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good progress, Max. A couple other housekeeping matters. Lyndon Burrell do you know wherewhere is Lyndon 	10 11 12 13 14 15 16 17 18 19 20	 address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine. A. Yes, I don't want her operating outside of that. And we run a business, and she is pretty busy. So, you know, she will help me get the documentation you need, butyou know, I consider
11 12 13 14 15 16 17 18 19 20	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good progress, Max. A couple other housekeeping matters. Lyndon Burrell do you know wherewhere is Lyndon Burrell A. Burrell 	10 11 12 13 14 15 16 17 18 19 20 21	 address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine. A. Yes, I don't want her operating outside of that. And we run a business, and she is pretty busy. So, you know, she will help me get the documentation you need, butyou know, I consider
11 12 13 14 15 16 17 18 19 20 21	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good progress, Max. A couple other housekeeping matters. Lyndon Burrell do you know wherewhere is Lyndon Burrell A. Burrell 961. Qif we needed to speak 	10 11 12 13 14 15 16 17 18 19 20	 address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine. A. Yes, I don't want her operating outside of that. And we run a business, and she is pretty busy. So, you know, she will help me get the documentation you need, butyou know, I consider myself the principal and the one who had the relationship with Banners for the most part, and
11 12 13 14 15 16 17 18 19 20 21 22	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good progress, Max. A couple other housekeeping matters. Lyndon Burrell do you know wherewhere is Lyndon Burrell A. Burrell 961. Qif we needed to speak A. Global Payments. 	10 11 12 13 14 15 16 17 18 19 20 21 22	 address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine. A. Yes, I don't want her operating outside of that. And we run a business, and she is pretty busy. So, you know, she will help me get the documentation you need, butyou know, I consider myself the principal and the one who had the relationship with Banners for the most part, and
11 12 13 14 15 16 17 18 19 20 21 22 23	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good progress, Max. A couple other housekeeping matters. Lyndon Burrell do you know wherewhere is Lyndon Burrell A. Burrell 961. Qif we needed to speak A. Global Payments. 962. Q. Okay. And can you give Gillianor 	10 11 12 13 14 15 16 17 18 19 20 21 22 23	 address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine. A. Yes, I don't want her operating outside of that. And we run a business, and she is pretty busy. So, you know, she will help me get the documentation you need, butyou know, I consider myself the principal and the one who had the relationship with Banners for the most part, and everyone else aiding in it, and I don't want to drag
11 12 13 14 15 16 17 18 19 20 21 22	 958. Q. Okay. But A. We will include it. U/T 959. Q. Thank you, because we consider G Cube to be affiliated. A. It is. 960. Q. All right. Okay. So, let'sI think we are done with that, and we are making good progress, Max. A couple other housekeeping matters. Lyndon Burrell do you know wherewhere is Lyndon Burrell A. Burrell 961. Qif we needed to speak A. Global Payments. 	10 11 12 13 14 15 16 17 18 19 20 21 22	 address and a phone number? A. Look, I don't mind bringing Tricia here, bringing her in or anything like that. I would prefer if she comes in or anything like that, she is with someone, she is with me. Not a lawyer, but 968. Q. That is fine. A. Yes, I don't want her operating outside of that. And we run a business, and she is pretty busy. So, you know, she will help me get the documentation you need, butyou know, I consider myself the principal and the one who had the relationship with Banners for the most part, and

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	Sheet 16 Page 58 M Morgon 217		Page 60 M. Morgan - 219
4	M. Morgan - 217	+	IVI. IVIOIGAII - 213
	A. She can obviously provide detail on		980. MR. WARD: Okay. So, justas I was
2	some transactions, because she was my payments	2	about to do, we are going to mark the large
3	manager, but to her they are just instructions.	3	black binder with 64 tabs as Exhibit M3 for
4	970. Q. So, can we just leave it that you	4	identification.
5	can make her available to us if necessary	5	
6	A. If necessary, yes.	6	EXHIBIT NO. M3: Large black binder with 64 tabs
7	971. Qon further requests? Okay, thank	7	-
8	you for that. And the two other names that I had,	8	BY MR. WARD:
9	again, from the first day, are Liza Abrigana and	9	981. Q. And, Max, I am at an e-mail behind
10	Alicia Varga.	10	tab 16.
11	A. Liza is in the Philippines, so she	11	A. Okay. Sorry, this is Chris Smith?
12	wouldn't be available. She no longer works with us.	12	982. Q. Yes, this is an e-mail from yourself
13	Alicia still works with me; however, she never had	13	to Chris Smith.
14	any affiliation with Banners Broker. I am not sure	14	A. Okay.
15		15	983. Q. Behind tab 16, and just take a
10	why she would be named on anything. She was	16	minute and refresh on it, but as I read it, on
16	completely not withshe was with the company at		Initiale and refresh of it, but as freduit, of
17	various, various times during the process, but did	17	January the 18th, Chris is telling you to look out
18	not have any affiliation whatsoever.	18	for three wires.
19	972. Q. All right.	19	A. Okay.
20	A. Had no dealings.	20	984. Q. And do you see the third wire there?
21	973. Q. And let's turn to thebecause I	21	It says:
22	think we are in the home stretch now	22	"From World WebMedia Swiss"
23	A. Sure.	23	A. Yes.
24	974. Qto tab 16 of the large document	24	985. Q. "200,000 euro to Barclays"
25	binder, which I believe I have already marked, but	25	A. Correct.
	Page 59		Page 61
	M. Morgan - 218		M. Morgan - 220
1	M. Morgan - 218 just to be clear for		M. Morgan - 220 986. Q. Can you just explain for me what
1 2	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe	1 2	M. Morgan - 220 986. Q. Can you just explain for me what that was?
3	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it.	3	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if
1 2 3 4	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe	3	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A
3	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it.	1 2 3 4 5	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card
3 4 5	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia.	3 4 5	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if
3 4 5 6	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga?	3 4 5	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund
3 4 5 6 7	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian	3 4 5 6 7	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he
3 4 5 6 7 8	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of	3 4 5 6 7 8	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's
3 4 5 6 7 8 9	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the	3 4 5 6 7 8 9	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors
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3 4 5 6 7 8 9 10	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know	3 4 5 6 7 8 9 10	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably
3 4 5 6 7 8 9 10 11 12	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash	3 4 5 6 7 8 9 10 11 12	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise,
3 4 5 6 7 8 9 10 11 12 13	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding	3 4 5 6 7 8 9 10 11 12 13	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had
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3 4 5 6 7 8 9 10 11 12 13 14 15	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada?	3 4 5 6 7 8 9 10 11 12 13 14 15	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account.
3 4 5 6 7 8 9 10 11 12 13 14 15 16	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes. 978. Q. Okay. And similarly	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab. Tab 17.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes. 978. Q. Okay. And similarly A. If you need to have her in to ask	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab. Tab 17. A. Okay.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes. 978. Q. Okay. And similarly A. If you need to have her in to ask questions regarding the Indian cash payments, I can	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab. Tab 17. A. Okay. 988. Q. And, again, as I read it, on January
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes. 978. Q. Okay. And similarly A. If you need to have her in to ask questions regarding the Indian cash payments, I can bring her in.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab. Tab 17. A. Okay. 988. Q. And, again, as I read it, on January the 26th, 2012, you are sending Chris
3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 20 21	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes. 978. Q. Okay. And similarly A. If you need to have her in to ask questions regarding the Indian cash payments, I can bring her in. 979. Q. Thank you. And justwe touched on	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab. Tab 17. A. Okay. 988. Q. And, again, as I read it, on January the 26th, 2012, you are sending Chris A. Yes, okay. So, it was the FIRMA
3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 18 9 20 21	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes. 978. Q. Okay. And similarly A. If you need to have her in to ask questions regarding the Indian cash payments, I can bring her in. 979. Q. Thank you. And justwe touched on	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab. Tab 17. A. Okay. 988. Q. And, again, as I read it, on January the 26th, 2012, you are sending Chris A. Yes, okay. So, it was the FIRMA foreign exchange, that is an FX firm that we deal
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes. 978. Q. Okay. And similarly A. If you need to have her in to ask questions regarding the Indian cash payments, I can bring her in. 979. Q. Thank you. And justwe touched on this the first day, but within Aramor, it was	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab. Tab 17. A. Okay. 988. Q. And, again, as I read it, on January the 26th, 2012, you are sending Chris A. Yes, okay. So, it was the FIRMA foreign exchange, that is an FX firm that we deal with. So, that is whyokay, that makes sense.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes. 978. Q. Okay. And similarly A. If you need to have her in to ask questions regarding the Indian cash payments, I can bring her in. 979. Q. Thank you. And justwe touched on this the first day, but within Aramor, it was yourself and not anyone else that authorized the	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab. Tab 17. A. Okay. 988. Q. And, again, as I read it, on January the 26th, 2012, you are sending Chris A. Yes, okay. So, it was the FIRMA foreign exchange, that is an FX firm that we deal with. So, that is whyokay, that makes sense.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22	M. Morgan - 218 just to be clear for A. Just to clarify, she did haveshe helped with the Indian payments. That was it. 975. Q. She being A. Alicia. 976. Q. Alicia Varga? A. Yes. So, she helped with the Indian cash payments, really just kind of orchestratingnot money movement, but the organization of files, because it was pretty messy, but that was it. I don't know what she would know or remember, but it was specific to Indian cash payments. So, if you have any questions regarding that, she could answer those. 977. Q. Now, is she in Canada? A. Yes. 978. Q. Okay. And similarly A. If you need to have her in to ask questions regarding the Indian cash payments, I can bring her in. 979. Q. Thank you. And justwe touched on this the first day, but within Aramor, it was	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	M. Morgan - 220 986. Q. Can you just explain for me what that was? A. I don't know if it is a typo, or if we had an FX account orno, not an FX account. A funding account to Barkley's for credit card funding. We have a program where you can fund credit cards directly, and it is possible that he sent money there. We have never had a Barkley's account. We have a lot of third-party processors that do. So, I wouldn't know why that would be sent to us. The other two, yes, and you could probably see that on the statements. G Cube and Monitise, but World WebMedia was not something that we had seen before, and we have never had a Barclay's account. 987. Q. Have a look at the very next tab. Tab 17. A. Okay. 988. Q. And, again, as I read it, on January the 26th, 2012, you are sending Chris A. Yes, okay. So, it was the FIRMA foreign exchange, that is an FX firm that we deal

			* 62
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 3 24 25	M. Morgan - 221 Barkley's account was it? A. From a foreign exchangeallowed us to receive funds in euros or any other currency to get exchanged and then send it off elsewhere if it needs toif it needs to be funded somewhere else. I don't know why he sent funds to FIRMA, and I don't knowI would have to go back and check, and I can certainly try to provide some background there as to why those funds were sent. My assumption is that it was used to fund one of his disbursement accounts or credit card funding, as mentioned in the 990. Q. I am just trying to put the twotab 16 and 17 together. And behind the blue sheet in tab 17 is the actual receipt from FIRMA Foreign Exchange. A. Yes. 991. Q. Or two FIRMA Foreign Exchange. A. Correct. 992. Q. What is happening here with this 200,000 euro? What is Aramor's involvement in dealing with Barclays, FIRMA Foreign Exchange and Banners Broker? A. We had a relationship with FIRMA only. Banners Broker, I don't knowWorldWeb Media Inc., we never received funds from them ever before	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 M. Morgan - 223 to us, exchange it and put it to our account. This is something else. This is them wanting to send the funds in euros or anotheror USD, but it is from Switzerland, and they want usclearly, World WebMedia, we haven't seen that on any of our other statements. So, this is a one-off. I don't know what it was for, and it wasn't sent directly to us. 996. Q. So, the account number on this statement A. Belongs to FIRMA. 997. Q. The one ending in???????????????????????????????
$\begin{bmatrix} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 24 \\ 25 \\ \end{bmatrix}$	 Page 63 M. Morgan - 222 in any account. The fact that they were sending it to here, it is possible that was a one-time thing, maybe in one of their offshore accounts. I am not sure, but they wanted money moved and 993. Q. Who is "they"? A. Either Chris orwhat is his name? Kuldip. This was brought up in our last meeting where you mentioned something about a Swiss bank. I am not sure why they would send funds at the time, but FIRMA has the capability of exchanging and moving the funds. And, so, it is likely that is what they did. 994. Q. And how did the receiptbecause the receipt that you have behind tab 17 that you are sending to Chris A. Yes. 995. Qhow did this come to you? A. Well, we had the a relationship with FIRMA. So, we authorized them to send it. Whateverwe said to them, "If you want funds exchanged, or you need somewhere to send euros, you could send it to FIRMA". Now, we have relationships here, and, you knowlike we had with Cambridge and a few other firms where we could haveif they needed to send us direct funds. They would send it 		Page 65

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				62
<u> </u>	Sheet 18 Page 66 Margan 005		. Page 68 007	
4	M. Morgan - 225		M. Morgan - 227	
	BY MR. WARD:		London every year around that time. I am going to	
2	1003. Q. So, Max, with reference to tabs 16	23	go on record and probably say it was Wirecard.	
3	and 17 of M3, if you couldif you are able to	3	1010. Q. Wirecard?	
4	make, if you are willing to make inquiries of	4	A. Out of Germany.	
5	FIRMÁ		1011. Q. Right. There is a reference in the	
6	A. Yes.	5	e-mail to you meeting with a few offshore banks in	
7	1004. Qto determine from them the		London.	
8		8	A. Yes.	
	disposition of the 200,000 euro. You will do that			
9	for us?	9	1012. Q. Did you do that on behalf of	
10	A. Sure. U/T	10	Banners, or	
11	1005. Q. Thank you. Okay. And, Max, we will	11	A. No. I go to London every year for a	
12	send you a list of all these undertakings as well.	12	big conference, and there is a lot of banks and	
13	You are welcome to please take notes, and	13	clients and entities that I deal with. So, I am	
14	A. Okay.	114	sure that whatever I went there for, I loosely	
15	1006. Qthere will be a transcript, but	14	mentioned this specific scenario, this specific	
16	we are happy to send you a list.	16	client to get a feeler for what might be out there.	
17	A. Okay.	117	And when I eaid I met with a few offebore banks I	
			And when I said I met with a few offshore banks, I	
8	1007. Q. Now, there is a few other e-mails	18	don't know how many. It is possible I said whatever	
19	that I want to get to that don't have to do with	19	I needed to appease them. They are my client,	
20	account transfers, per se. They are a little more	20	but	
21	higher-level or general, but either yourself or	21	1013. Q. You also sayyou say further down,	
22	Burrell were across them with Smith. And the first	22	vou sav:	
23	one I want to take you to is tab 18.	23	"Here is the message I got back in my	
24	A. Sure.	24	you say: "Here is the message I got back in my last conversation with a bank in Europe	
25	1008 O And this is a discussion you	125		
25	1008. Q. And this is a discussion, you	25	after I submitted everything"	
25	Page 67	25	after I submitted everything"	
25	Page 67 M. Morgan - 226	25	Page 69 M. Morgan - 228	
2 <u>5</u> 1	Page 67 M. Morgan - 226 authored the e-mail, but the subject of the e-mail	1	A. Yes.	
2 <u>5</u> 1 2	M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty	1	A. Yes. 1014. Q. So, was there some sort of an	
1 2 3	M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I	25	A. Yes. 1014. Q. So, was there some sort of an application that you submitted?	
25 1 2 3 4	M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here.	1 25 1 2 3 4	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package.	
12345	M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they	25 1 2 3 4 5	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might	
25 1 2 3 4	M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here.	1 25 1 2 3 4	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package.	
12345	M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they needed a master account, or what a master account	25 1 2 3 4 5	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera,	
1234567	Rage 67 M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they needed a master account, or what a master account might have been at the time. I don't know. It	1 25 1 2 3 4 5 6 7	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might	
25 12345678	M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they needed a master account, or what a master account might have been at the time. I don't know. It clearly was a term that we used here. They came to	1 2 3 4 5 6 7 8	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or	
123456789	Page 67 M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they needed a master account, or what a master account might have been at the time. I don't know. It clearly was a term that we used here. They came to us initially in the latter part of 2011 for a whole	25 1 2 3 4 5 6 7 8 9	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or 1015. Q. But does that help you remember	
25 1234567890	Rage 67 M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they needed a master account, or what a master account might have been at the time. I don't know. It clearly was a term that we used here. They came to us initially in the latter part of 2011 for a whole bunch of things, primarily credit card processing,	25 1 2 3 4 5 6 7 8 9 10	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or 1015. Q. But does that help you remember which bank it was?	
12345678901	Page 67 M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they needed a master account, or what a master account might have been at the time. I don't know. It clearly was a term that we used here. They came to us initially in the latter part of 2011 for a whole bunch of things, primarily credit card processing, but other things that they figured, you know what,	25 1 2 3 4 5 6 7 8 9 10 11	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or 1015. Q. But does that help you remember which bank it was? A. Not really, it doesn't. I could go	
123456789012	Page 67 M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they needed a master account, or what a master account might have been at the time. I don't know. It clearly was a term that we used here. They came to us initially in the latter part of 2011 for a whole bunch of things, primarily credit card processing, but other things that they figured, you know what, you have relationships with that you can probably an probably	25 1 2 3 4 5 6 7 8 9 10 11 12	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or 1015. Q. But does that help you remember which bank it was? A. Not really, it doesn't. I could go on record and saying Wirecard because I have a	
1234567890123	Page 67	25 1 2 3 4 5 6 7 8 9 10 11 12 13	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or 1015. Q. But does that help you remember which bank it was? A. Not really, it doesn't. I could go on record and saying Wirecard because I have a pretty good relationship with them. Yes, no, I	
12345678901234	Page 67 M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they needed a master account, or what a master account might have been at the time. I don't know. It clearly was a term that we used here. They came to us initially in the latter part of 2011 for a whole bunch of things, primarily credit card processing, but other things that they figured, you know what, you have relationships with that you can probably obtain, which is true. The premise of this e-mail was to understand their business model, because it	25 1 2 3 4 5 6 7 8 9 10 11 12 13 14	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or 1015. Q. But does that help you remember which bank it was? A. Not really, it doesn't. I could go on record and saying Wirecard because I have a pretty good relationship with them. Yes, no, I wouldn't remember which exact bank it was. Bear in	
5 123456789012345	Page 67	25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or 1015. Q. But does that help you remember which bank it was? A. Not really, it doesn't. I could go on record and saying Wirecard because I have a pretty good relationship with them. Yes, no, I wouldn't remember which exact bank it was. Bear in mind, this wasI mean, we submit applications to	
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25 123456789012345678901	Page 67 M. Morgan - 226 authored the e-mail, but the subject of the e-mail is a master account that you are having difficulty in obtaining. So, if you could refresh on that, I would like you to explain what the issue is here. A. I can't recall exactly why they needed a master account, or what a master account might have been at the time. I don't know. It clearly was a term that we used here. They came to us initially in the latter part of 2011 for a whole bunch of things, primarily credit card processing, but other things that they figured, you know what, you have relationships with that you can probably obtain, which is true. The premise of this e-mail was to understand their business model, because it looked very risky to some of the banks or entities I spoke with, that they wanted me to engage with, and I wanted them toI got a message back from a bank in Europe that wanted to understand their business model a little bit more, and I didn't have a full understanding as far as what was on the website. You know, my understanding initially was that it was	25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or 1015. Q. But does that help you remember which bank it was? A. Not really, it doesn't. I could go on record and saying Wirecard because I have a pretty good relationship with them. Yes, no, I wouldn't remember which exact bank it was. Bear in mind, this wasI mean, we submit applications to banks and processors daily in the hundreds sometimes, back then. So, I would have to go back and look at some of the relationships I have, and see 1016. Q. Okay. Awho it was, but I don't thinkI	
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1 2 3 4 5 6 7 8	Page 67	25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. 1014. Q. So, was there some sort of an application that you submitted? A. I think it wasyes, a package. So, it might have been an application. It might have also been the principals' documents, et cetera, and I don't think it was by e-mail. I think I might have personally delivered it, or 1015. Q. But does that help you remember which bank it was? A. Not really, it doesn't. I could go on record and saying Wirecard because I have a pretty good relationship with them. Yes, no, I wouldn't remember which exact bank it was. Bear in mind, this wasI mean, we submit applications to banks and processors daily in the hundreds sometimes, back then. So, I would have to go back and look at some of the relationships I have, and see 1016. Q. Okay. Awho it was, but I don't thinkI don't even think the bank would have kept this	

				6
	Sheet 19 Page 70		Page 72	
	M. Morgan - 229		M. Morgan - 231	
1	understand how to classify your business, or	1	much of a relation with Kuldip, so I think his	
2	understand what it is, then it is going to be hard	2	relation was morehis role was more silent. But,	
3	for me to operate for you, to represent you in what	3	yes, Chris' relationship with a little bit puzzling.	
1	you need, because it is risky and people don't	4	I had concerns about him. Rajiv, not so much. I	
+				
5	understand it.	5	justoff the record.	
6	1017. Q. You didn't understand it, either?	6		
7	A. I understood what I thought I	7	DISCUSSION OFF THE RECORD	
3	understood, and then when I saw this, or saw the	8		
9	bank sent this, I met with them and said, "Guys, you	9	THE DEPONENT: I just didn't want to	
)	know, this is extremely complicated" and banks are	10	paint him in a certain way.	
'	coored of this type of activity. It is an MIM but	111	pant min in a certain way.	
	scared of this type of activity. It is an MLM, but			
	the way they are explaining it, it sounds like it	12	BY MR. WARD:	
	could be something else. It sounds like it could be	13	1021. Q. Him being	
	duplicitous in some way.	14	A. Rajiv.	
	1018. Q. Right. I mean, I take it that you	15	1022. Q. Ókay.	
	were never completely comforable with this business.	16	A. I have no problem saying he is a	
	Is that fair?	117	friend, but I don't know their business dealings in	
	A. I was comfortable with the	18		
			and out well enough to say thathow involved he	
	principals involved. I thought they were good guys.	19	was. I know when it came to money, outside of what	
	I thought they were honest. I thought they were	20	Stellar Point needed for their payroll and their	
	building a good business. They seemed to have a	21	overhead, which was very clear to me, I primarily	
	good morale with their staff, and good press at the	22	dealt with Chris on all the instructions, incoming	
	time. So, I just wanted them to provide clarity and	23	and outgoing.	
	make the business model simpler so that it provided	24	1023. Q. Have you spoken with Smith lately?	
		25	A. Never. It has beenthe last	
	less questions, you know? My job when I set up a	20		
- 1	Page 71		Page 73	
	M. Morgan - 230		M. Morgan - 232	
	merchant with accounts is to help them with their	1	dealing we had with them, in terms of money going	
	business, and to help the bank, or process or	2	into our BMO account was the last time I probably	
	understand the model so that it causes less problems	23	1024. Q. Okay.	
	when there is underwriting, it causes less problems	4	Acommunicated with him.	
	if there is a case of fraud, because things	5	1025. Q. And what about the last	
		6		
	likefraud happens all the time in credit card		communication or contact with Josun?	
	transactions, and it is not always the merchant's		A. It has probably been years. I know	
	fault. So, I wanted to represent their interests	8	he	
	clearly, and	9	1026. Q. Okay.	
	1019. Q. I guess just to help us understand,	10	Aleft the company	
	because part of the I mean, the receiver has to	111	1027. Q. Right.	
	tell the story here, as well, in terms of what	12	A. Yes, I only had met with him maybe	
		113	three or four times in total since we knew each	
	1020. Qtheir understanding of the	14	other. So, yes, I didn'tfor him, it was more of	
	business is. But I take it that the comfort that	15	a handshake. We never spoke much more than that.	
	you had with the principals, did that change at some	16	1028. Q. And how about Dixit? Rajiv?	
	point? I mean, CIBC shut down your accounts later	17	A. Probably a week ago.	
		18	1029. Q. A weék ago?	
		11111		
	on		Α Υρς	
	on A. Yes, and they shut it down mainly	19	A. Yes.	
	on A. Yes, and they shut it down mainly because there was carelessness. I wouldn't say	19 20	1030. Q. Okay.	
	on A. Yes, and they shut it down mainly because there was carelessness. I wouldn't say these guys were dishonest. They didn't try to hide	19 20 21	1030. Q. Okay. A. Our kids are in the same school.	
	on A. Yes, and they shut it down mainly because there was carelessness. I wouldn't say	19 20 21 22	1030. Q. Okay. A. Our kids are in the same school. So, if I pick up my kids, I will see him.	
	on A. Yes, and they shut it down mainly because there was carelessness. I wouldn't say these guys were dishonest. They didn't try to hide anything from me. So, I wasn't necessarily upset	19 20 21	1030. Q. Okay. A. Our kids are in the same school. So, if I pick up my kids, I will see him.	
	on A. Yes, and they shut it down mainly because there was carelessness. I wouldn't say these guys were dishonest. They didn't try to hide	19 20 21 22	1030. Q. Okay. A. Our kids are in the same school. So, if I pick up my kids, I will see him.	

	Sheet 20 Dago 74		Page 76
	Sheet 20 Page 74 M. Morgan - 233		M. Morgan - 235
1	guy, soyou know? If people come around, I will	1	1039. Q. Right.
2	see himOshawa is not a big place. So, yes, I		Athat he sells stuff out of. He
		23	needed a merchant account. I introduced him to
3	know him very well.		
4	1032. Q. How did the richest	4	someone who would obtain it for him, and I know he
5	fast-forwardinghow did the relationship end, the	5	had some other interest that he is working on, that
6	Aramor relationship with Banners?	6	isI loosely consult with him on. I told him
/	A. With Banners?	7	anything related to an MLM, I can't be involved
7 8 9	1033. Q. Who ended it, and how?	8	with, just based on what has happened with Banners,
	A. I don't know if it ended that	9	it is just too risky. And since then, Aramor has
10	formally. I think it was kind of like, "We don't	10	turned away any business from any MLM just because
11	have any more accounts for you guys to fund. We can	11	it isthe risk profile is too high.
12	continue doing introductions for you". Lyndon	12	1040. Q. Right, right. The question is,
13	didn't want anything to do with it anymore, just	13	Stephanie Schlacht was also involved in the Banners
14	because of the stuff coming up online. We still had	14	Broker business. We know that for quite a while,
15	a relationship with Allied Wallet, and they were	15	and then she is married to Rajiv. First of all, did
16	still processing credit cards with them, and they	16	you have any business dealings with her in terms of
17	were still providing us with our commissions. So,	17	taking instructions for payouts or anything else?
18	where that is concerned, I just left that as is. I	18	A. No. No, everything was Chris. She
19	think they just scaled down their business on their	19	was Rajiv's executive assistant, apparently, at the
20	own.	20	time. I dealt with her a lot when it came to
21	1034. Q. Well, they ended up getting put into	21	Stellar Point, but not when it came to payment
22	liquidation in the Isle of Man	22	instructions. Just administrative stuff; if I
23	A. Right.	23	needed to met with Rajiv or something, she would
23	1035. Qand then receivership here. So,	24	book it. So, no, I mean, the relationship I had
25	were you with them pretty much to the end, then?	25	with her after was more of a friendly one because of
25	were you with them pretty much to the ond, them.	20	with her alter was more of a menaly one because of
	Docto 75		Page 77
	Page 75 M Morgan - 234		Page 77 M Morgan - 236
	M. Morgan - 234	1	M. Morgan - 236
1	M. Morgan - 234 A. No, just, all of a sudden,	1	M. Morgan - 236 their romantic dealings.
1 2	M. Morgan - 234 A. No, just, all of a sudden, justcommunication kind of ceased, particularly	1 2	M. Morgan - 236 their romantic dealings. 1041. Q. Were you at their wedding?
1 2 3	M. Morgan - 234 A. No, just, all of a sudden, justcommunication kind of ceased, particularly with Chris. Rajiv still communicated with me	1 2 3	M. Morgan - 236 their romantic dealings. 1041. Q. Were you at their wedding? A. I was in the wedding.
1 2 3	M. Morgan - 234 A. No, just, all of a sudden, justcommunication kind of ceased, particularly with Chris. Rajiv still communicated with me because he valued my input on payment processing.	1 2 3 4	M. Morgan - 236 their romantic dealings. 1041. Q. Were you at their wedding? A. I was in the wedding. 1042. Q. In their wedding?
1 2 3 4 5	M. Morgan - 234 A. No, just, all of a sudden, justcommunication kind of ceased, particularly with Chris. Rajiv still communicated with me because he valued my input on payment processing. So, he would ask me questions. You know, I know he	1 2 3 4 5	M. Morgan - 236 their romantic dealings. 1041. Q. Were you at their wedding? A. I was in the wedding. 1042. Q. In their wedding? A. Yes.
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1 2 3 4 5 6 7	M. Morgan - 234 A. No, just, all of a sudden, justcommunication kind of ceased, particularly with Chris. Rajiv still communicated with me because he valued my input on payment processing. So, he would ask me questions. You know, I know he had other business interest he wanted to pursue. So, he asked me questions and I knew new his wife	1 2 3 4 5 6 7	M. Morgan - 236 their romantic dealings. 1041. Q. Were you at their wedding? A. I was in the wedding. 1042. Q. In their wedding? A. Yes. 1043. Q. Okay. A. A lot of people asked me to be in
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1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 12 3 4 5 6 7 8 9 20 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 15 16 17 10 10 10 10 10 10 10 10 10 10 10 10 10	M. Morgan - 234 A. No, just, all of a sudden, justcommunication kind of ceased, particularly with Chris. Rajiv still communicated with me because he valued my input on payment processing. So, he would ask me questions. You know, I know he had other business interest he wanted to pursue. So, he asked me questions and I knew new his wife very well. And, so, I still had communication with Rajiv, but not Chris, and Chris was the guy I communicated with for the business a long time ago. 1036. Q. Right. A. Rajiv left Banners and did his own thing with Stellar Point, and decided he wanted to do web hosting and a host of other things, and 1037. Q. Right. Aso, he came to me to ask about payment processing and I said as long as it is not in the realm of what you were doing with Banners Broker, we can look at it. I can make the introduction at the very least. So, that is what I did. 1038. Q. Right, right. And I take it you are not working with Rajiv now currently?	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\0\\1\\1\\2\\3\\4\\1\\5\\6\\7\\8\\9\\0\\1\\2\\2\\2\\3\\24\end{array}$	M. Morgan - 236 their romantic dealings. 1041. Q. Were you at their wedding? A. I was in the wedding. 1042. Q. In their wedding? A. Yes. 1043. Q. Okay. A. A lot of people asked me to be in their wedding. 1044. Q. All right. A. Yes, we are not particularly 1045. Q. So, you are like a groomsman? A. I was a groomsman. If you know Rajiv, he is not very charming. So, people who have been kind to him and friendly, he is just that kind of character, and he asked me to be in his wedding. So, I said, "Sure, you know, I will make your wedding look better. I will be in it". I am good for a party anyways. 1046. Q. Okay. I am going to move through some points quickly, because I don't think a lot turns onit may be that not a lot turns on this, but there is a reference at tab 25 of this binder to what is called a closed-loop solution. A. Yes.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21	M. Morgan - 234 A. No, just, all of a sudden, justcommunication kind of ceased, particularly with Chris. Rajiv still communicated with me because he valued my input on payment processing. So, he would ask me questions. You know, I know he had other business interest he wanted to pursue. So, he asked me questions and I knew new his wife very well. And, so, I still had communication with Rajiv, but not Chris, and Chris was the guy I communicated with for the business a long time ago. 1036. Q. Right. A. Rajiv left Banners and did his own thing with Stellar Point, and decided he wanted to do web hosting and a host of other things, and 1037. Q. Right. Aso, he came to me to ask about payment processing and I said as long as it is not in the realm of what you were doing with Banners Broker, we can look at it. I can make the introduction at the very least. So, that is what I did. 1038. Q. Right, right. And I take it you are	1 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 2 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 10 11 12 1 12 1 12 1 12 1 1 12 1 1 1 1	M. Morgan - 236 their romantic dealings. 1041. Q. Were you at their wedding? A. I was in the wedding. 1042. Q. In their wedding? A. Yes. 1043. Q. Okay. A. A lot of people asked me to be in their wedding. 1044. Q. All right. A. Yes, we are not particularly 1045. Q. So, you are like a groomsman? A. I was a groomsman. If you know Rajiv, he is not very charming. So, people who have been kind to him and friendly, he is just that kind of character, and he asked me to be in his wedding. So, I said, "Sure, you know, I will make your wedding look better. I will be in it". I am good for a party anyways. 1046. Q. Okay. I am going to move through some points quickly, because I don't think a lot turns onit may be that not a lot turns on this, but there is a reference at tab 25 of this binder to what is called a closed-loop solution.

				62
Γ	Sheet 21 Page 78 M. Morgan - 237		Page 80 M. Morgan - 239	
	1 What is that?	1	A. Not really. I think he just	
			washe would earn commissions if he could get	
	A. Yes, that is like eWallet. I don't	2 3 4		
	know if you have heard of the term "eWallet".	U S	UseMyServices to do something. He had built a	
	4 1048. Q. I have, yes.	4	relationship with them. So, I think he introduced	
	5 A. Okay. So, an eWalletMLMs like	5	that option. The UseMyServices never did anything	
	6 eWallets because it allows money to come in. Each	6	for them there because it just fell through. It	
	7 individual or each of their customers has an	7	didn't work out. Bangladesh was a tough place to	
	3 individual subaccount. It is virtual money really,	8	get money out of.	
	and then when they want to cash it out to have it	8	1055. Q. Okay. So, here istab 29 is more	
1		10	interesting. So, let's move on to that. The	
1		11	subject is "Cash pickup".	
1	there, and I have been exploring options for them to	12	A. Right.	
1	have an eWallet solution that I could introduce them	13	1056. Q. And just to refresh on itreview	
14		14	it	
1	,	15	A. Sure.	
11		16	1057. Qand then if you could just	
1		17	describe for me what is going on here, in terms	
18		18	of	
19		19	A. Yes, it was justhe had some money	
20	0 1050. Q. Okay. And then moving forward, tab	20	to pick up, pretty much. The information was	
2	28, there is some correspondence regarding options	21	provided to me as to where he was to pick up the	
22	to do business in Bangladesh.	22	funds, and I told him I can't pick up the funds. I	
23	A. Yes.	23	am not going to disburse them for you. I am not	
24	1051. Q. Tell me about that, because	24	walking around with that kind of money. So, I gave	
24 25	A. Sure.	25	him the information to pick it up, and who to ask	
	_ Page 79		Page 81	
	M. Morgan - 238		M. Morgan - 240	
	1052. Q. Yes, please.	1	for it, and that was it. These e-mails are pretty	
		2	much the extent of the communication when it comes	
	travel and Paiju was protty beauty on the sales and	3	to money. Sometimes there was a PIN that he would	
		4	give them or a encoific code. Semetimes just the	
		5	give them, or a specific code. Sometimes just the	-
5			person he would ask for.	
		10		
7			1058. Q. So, do you know Jason Berry?	
		7	A. No, I think that is an alias,	
8	needed payment options there. I had never done	7 8	A. No, I think that is an alias, probably.	
9	needed payment options there. I had never done anything related to Bangladesh, and I didn't know a	7 8 9	A. No, I think that is an alias, probably. 1059. Q. And is	
10	needed payment options there. I had never done anything related to Bangladesh, and I didn't know a lot. We had a relationship with UseMyServices, and	7 8 9 10	A. No, I think that is an alias, probably. 1059. Q. And is A. I am pretty certain it would be.	
10 11	needed payment options there. I had never done anything related to Bangladesh, and I didn't know a lot. We had a relationship with UseMyServices, and UseMyServices mentioned they might be able to do	7 8 9 10 11	A. No, I think that is an alias, probably. 1059. Q. And is A. I am pretty certain it would be. 1060. Q. And was this something thatthis	
10 11 12	needed payment options there. I had never done anything related to Bangladesh, and I didn't know a lot. We had a relationship with UseMyServices, and UseMyServices mentioned they might be able to do something. And, so, I think we just started to	7 8 9 10 11 12	A. No, I think that is an alias, probably. 1059. Q. And is A. I am pretty certain it would be. 1060. Q. And was this something thatthis is something that Aramor coordinated for Chris,	
10 11 12 13	needed payment options there. I had never done anything related to Bangladesh, and I didn't know a lot. We had a relationship with UseMyServices, and UseMyServices mentioned they might be able to do something. And, so, I think we just started to explore that option for them. There was nothing	7 8 9 10 11 12 13	 A. No, I think that is an alias, probably. 1059. Q. And is A. I am pretty certain it would be. 1060. Q. And was this something thatthis is something that Aramor coordinated for Chris, right? 	
10 11 12 13 14	needed payment options there. I had never done anything related to Bangladesh, and I didn't know a lot. We had a relationship with UseMyServices, and UseMyServices mentioned they might be able to do something. And, so, I think we just started to explore that option for them. There was nothing direct that Aramor could do, but we were looking at	7 8 9 10 11 12 13 14	 A. No, I think that is an alias, probably. 1059. Q. And is A. I am pretty certain it would be. 1060. Q. And was this something thatthis is something that Aramor coordinated for Chris, right? A. Loosely. I can't recall if these 	
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9 10 11 12 13 14 15 16 17 18 19 20 21	 needed payment options there. I had never done anything related to Bangladesh, and I didn't know a lot. We had a relationship with UseMyServices, and UseMyServices mentioned they might be able to do something. And, so, I think we just started to explore that option for them. There was nothing direct that Aramor could do, but we were looking at relationships that might be able to facilitate that. 1053. Q. So, was something put in place? Do you know? A. Not that I remember. It is possible there was some sort of short-term solution, but Bangladesh was very difficult. I don't think UseMyServices could do it. I think we tried to look at some other services that might be able to do it, 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. No, I think that is an alias, probably. 1059. Q. And is A. I am pretty certain it would be. 1060. Q. And was this something thatthis is something that Aramor coordinated for Chris, right? A. Loosely. I can't recall if these were either his existing funds that he already had with us, and we sent it. Of if he sent it. You know, and that I can look into, but, yes, I did coordinate it for him in the sense that the individual that did ouror eKash that did our Indian payments, they had a money service business here, as well, and they said they can do cash disbursements, which we thought was above-ground, because they are a money service business. The 	

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1	Sheet 22 Page 82		Page 84
11	M. Morgan - 241		M. Morgan - 243
	they could rent out and, you know	1	are talking about", and this is one of those
2	1061. Q. Well, have you ever been to 14 Haas	23	instances where, you know, we said we would go ahead
3	Road		and put it down while we searched for it, and find
4	A. No.	4	out what is what, but I think it is clear, in this
5	1062. Qunit 106?		e-mail, that we weren't aware of any other deposits,
6	A. No.	6	we need information notices as there are several
7	1063. Q. I mean, why do you think it is a	7	deposits daily, there is no way to know whose money
8	virtual office? Like, what would we see there?	8	is whose. We were trying towe were trying to
9	A. That is just how eKash operated.	9	keep him organized, you know
10	They always hadI mean, they would use Regus or	10	1070. Q. You were trying to sort things out,
11	other companies to have their operations at. I		right?
12	think they just didn't like to sign any long-term	12	A. We were trying to sort things out.
13	leases, so it made sense for them.	13	1071. Q. Okay.
14 15	1064. Q. Okay. So, when you say "virtual	14	A. So, I don't know if there was ever
16	office", you mean that it wouldn't say eKash A. Not virtual office, but, yes,	16	that deposit. I would have to look, but it doesn't sound consistent with the type of deposits they were
17	boutique office where they could just use it for the	117	doing.
18	day if they wanted to, or they could be there	18	1072. Q. Right. But can we take it
	longer, but it wouldn't say eKash on the door.	19	thatand I mean, we will see this when we look at
19 20 21	1065. Q. Okay.	20	yourthe additional documents. I mean, ultimately
21	A. Although they could have that	21	Aramor was able to reconcile what went in and out on
22 23	option, perhaps. I am not sure.	22	account of Banners?
23	1066. Q. Now, you have promised uswhat we	23	A. No, not all the time. There was
24	call loosely a disbursement summary. So, can l	24	lots of money missing at different times, because
25	assume that if that \$40,000 went through any of	25	they said they sent something and it didn't come, or
	Page 83 M Mayner 040		Page 85
1	M. Morgan - 242	11 -	M. Morgan - 244 their customer sent something and it didn't come.
2	Aramor's accounts, you will A. Yes.		There was probably about half a million dollars
3	1067. Qand that you had funded it to	3	missing, their total reconciliation. They didn't
4	eKash, we would see that on the summary that you are	4	seem to care most of the time.
5	going to provide?		
		11 5	1073. Q. But to the extent that money came
6	A. As best as possible. I don't know	5	1073. Q. But to the extent that money came into Aramor, you are going to be able to
7	A. As best as possible. I don't know if it ever did go through us, but I will		into Aramor, you are going to be able to A. Yes, if it came to Aramor,
7	if it ever did go through us, but I will double-check.	6 7 8	into Aramor, you are going to be able to A. Yes, if it came to Aramor, absolutely. There isI mean, this is April 24th,
7 8 9	if it ever did go through us, but I will double-check. U/T 1068. Q. Thank you. And then over the page,	6 7 8 9	into Aramor, you are going to be able to A. Yes, if it came to Aramor, absolutely. There isI mean, this is April 24th, 2012. If this came in from them, you will see it on
7 8 9 10	if it ever did go through us, but I will double-check. U/T 1068. Q. Thank you. And then over the page, the next e-mail deals with a larger amount.	6 7 8 9 10	into Aramor, you are going to be able to A. Yes, if it came to Aramor, absolutely. There isI mean, this is April 24th, 2012. If this came in from them, you will see it on the statement.
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 if it ever did go through us, but I will double-check. U/T 1068. Q. Thank you. And then over the page, the next e-mail deals with a larger amount. A. This is 30? 1069. Q. Yes, tab 30. Just reread it. I think myI am not sure I had a question on this one, other thanI mean, it is a large amount, \$400,000 deposit. You say: "It will be accounted for today by Tricia" A. Yes, and I think what happened is, so much money was coming in at the time, and we had other clients funding the same account. We had no idea to know whose was whose at times, although our other clients were very clear as to what was going on. Sometimes money would come in for Chris, or he 	6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	 into Aramor, you are going to be able to A. Yes, if it came to Aramor, absolutely. There isI mean, this is April 24th, 2012. If this came in from them, you will see it on the statement. 1074. Q. Okay, thank you. And just moving on to tab 33, there is a referencethis is an exchange between Lyndon and Allied Wallet? A. Yes. 1075. Q. And Allied Wallet is telling Lyndon, all U.S. cards and anything coming from a U.S. IP address are blocked? A. Yes. 1076. Q. Do you understand what the reason for that was? A. Yes. So, oftentimesso, for Banners Broker, they were accepting payments from everywhere internationally. U.S. purchasers tend to
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 if it ever did go through us, but I will double-check. U/T 1068. Q. Thank you. And then over the page, the next e-mail deals with a larger amount. A. This is 30? 1069. Q. Yes, tab 30. Just reread it. I think myI am not sure I had a question on this one, other thanI mean, it is a large amount, \$400,000 deposit. You say: "It will be accounted for today by Tricia" A. Yes, and I think what happened is, so much money was coming in at the time, and we had other clients funding the same account. We had no idea to know whose was whose at times, although our other clients were very clear as to what was going 	6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	 into Aramor, you are going to be able to A. Yes, if it came to Aramor, absolutely. There isI mean, this is April 24th, 2012. If this came in from them, you will see it on the statement. 1074. Q. Okay, thank you. And just moving on to tab 33, there is a referencethis is an exchange between Lyndon and Allied Wallet? A. Yes. 1075. Q. And Allied Wallet is telling Lyndon, all U.S. cards and anything coming from a U.S. IP address are blocked? A. Yes. 1076. Q. Do you understand what the reason for that was? A. Yes. So, oftentimesso, for Banners Broker, they were accepting payments from

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Sheet 23 Page 86 M Morgan - 245	Page 88 M Morgan - 247
M. Morgan - 245 bank and they charge it back right away. And, so, oftentimes, that spikes the chargeback ratio, and it is not really indicative of how good the merchant is when it makes them look bad. At some point the credit card processor is going to sayor the bank will say, "We can't process for you anymore, the chargebacks are too high". 1077. Q. I see. A. And, so, the processor's job is to find ways to reduce that or to mitigate the risk somewhat. Sometimes, there is different chargeback management programs, but this one would be okay, just stop taking U.S. cards, maybe there is another way you can get your U.S. payments. And the U.S., I believe, was a small fraction of what they were doing. Most of their good business was in developing countries. And, soor places like Ireland, you know? European countries. So, it had been suggested to usit had been suggested to us that maybe with this merchant, we should probably get rid of U.S. cards on this specific account, and Allied was good to work with. They didn't want to	M. Morgan - 247 Wallet would have wanted. 1081. Q. Right. A. So, yes. 1082. Q. Okay. And how long dodo you know how long monies need to be held at Allied Wallet and be subject to chargebacks? Like, do you know how that end of things A. I don't think there is a statute of limitations onthere is a statute of limitations on chargebacks, within reason. So, obviously if you bought something five years ago, you can't charge it back, but I think you have at least up to 60 days. 1083. Q. Right. A. I am not 100 percent sure, but I know with U.S. cardholders, as soon as they see their statemet, if there is something that is not 1084. Q. Do you know whether or not Alliedfrom your dealings with Allied Wallet, do you know whether Allied Wallet has any Banners Deroker holdbacks? A. Well, in their pricing, Banners Broker had a 10 percent rolling reserve, maybe hicker. Mayke it wont up to like 15 percent.
23 keep the account open. And, so, they made that	23higher. Maybe it went up to like 15 percent. That24is standard on high-risk merchant accounts where
24 suggestion. 25 1078. Q. Okay. And here is a question, maybe	25 they are going to say, "We are going to hold 10
Page 87	Page 89
M. Morgan - 246 it is for you more with your industry consulting hat on, but how didfor Allied Wallet, what was the ratio? Do you have some understanding of the ratio of chargebacks to monies that went through their account? A. Sure. It spiked one time up to about 8 to 10 percent, specifically U.S. cards. And it wasn't anything wrong that Banners was doing, but when you see that spike in such a short period of time, it can be a lot of different factors. At this point, they were compliant will Allied Wallet, there was no problems, and so Banners Broker's program said, "Okay, we will restrict certain things on our site, or are you able to do certain things on your end?" And Allied said, sure. And Allied had orchestrated a call with us at that time to kind of outline what needed to be done to bring this under control. Otherwise, Visa and MasterCard would eventually determine what needed to be done. 1079. Q. Well, when Allied blocked the U.S. IP addresses, did that reduce the chargeback?	M. Morgan - 248 percent of all the monies collected for, you know, 90 days, 180 days", and it is assumed by most high-risk merchants that if the account is, you know, shut down, that they are not going to see that money back. 1085. Q. Why not? A. It is just how it goes with high-risk accounts. 1086. Q. Where does it go, though? 10 A. The processor keeps it. 11087. Q. Did they disburse it out from 12 chargebacks, or does the process 13 A. Well, they are holding it for 14 chargebacks, yes. 15 1088. Q. Right. 16 A. But if the chargebacksit is very 17 rare I have ever seen that money paid back. There 18 is very few processors that say, "Okay, after a year 19 we have 70,000 left. Here it is". 20 1089. Q. Right. 21 A. Very rare.

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	Sheet 24 Page 90		• Page 92	630
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 13 14 15 16 17 18 19 20 21 22 32 4 25	M. Morgan - 249 because once we set up the account, where the money goes as far as reserves is not our prerogative. 1091. Q. All right. A. But I know they had a fixed 10 percent, and as the situation with their processing changed, I think it went up to 15. 1092. Q. And you don't know what the situation is now vis-a-vis Banners and Allied? A. No. It isI mean, the relationship has been over for some time, excuse me, so, yes, I am not too sure. 1093. Q. Okay. And then perhaps this is to the same point, but what is a whitelist system? There is a reference to it in the letter at tab 42. A. A whitelist system would be an acceptable list of cards that could be charged. So, yes, they might have dropped or deleted or restricted U.S. cards and U.S. traffic, but there might have been some that are whitelisted to be able to go through. Whitelisted are friendly, so people who are recurring buyers, or maybe someone who you know is going to be allowed to buy again, because they have a good history. 1094. Q. I see. So, they could still be a U.S. card, but the person thatthe cardholder is	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	M. Morgan - 251 well over there. We used to have a prepaid card program with them many, many years ago, that we abandoned. 1097. Q. "We" being A. Aramor. 1098. QAramor? A. I know that Banners, particularly Chris and Rajiv, liked dealing with Choice Bank, and they liked doing things in Belize. That is the extent of what I know. They are not necessarily a bank I would do business with, but that is just because I don't want money to disappear one day, so 1099. Q. Meaning? A. I don't find themthey are notyou know, in terms of offshore banks, it just doesn't seem like a bank that would take good care of, you know, certain things. 1100. Q. I see. A. And sometimes, when something is too easy to set up, it is a red flag to me. 1101. Q. Okay. And, similarly, can you tell me anything about Via Bank? A. Via? 1102. Q. Via Bank or Via Bank in St. Lucia?	
$\begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 4 \\ 25 \end{array}$	 Page 91		Page 93 M. Morgan - 252 A. No. 1103. Q. No? A. That one I don't know. 1104. Q. And have you heard of or had any dealings with a gentleman by the name of Jordan Oxley? A. No. 1105. Q. Okay. I thought I detected a A. Oxley is a funny last name, that is all. 1106. Q. Okay. All right, we are back to Exhibit M3. We are at tab 45. And this relates to eKash payments, and I think we need to deal with these e-mails in reverse order. A. Sure. 1107. Q. So, if you have a look three pages into the production, there is a page that is marked at the bottom as beingas ending in 19/3. A. Okay. 1108. Q. And at the top of that page, in fact, on the proceeding page, you are writing to Chris. And obviously take a minute and read this. You were going to do the cash thing for him. And then you go on to say: "Won't be using Nana this time. I have	

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 20 21 22 3 24 25	 Sheet 25 Page 94 M. Morgan - 253 a better solution, and it is cheaper than waiving the fees. Sources are very thorough" Is how the e-mail ends. Can you just tell me about what was being transacted here? A. Yes. So, Nana is eKash. What is the date on this? 1109. Q. It is November 7, 2012. A. Okay. So, yes. Nana is eKash. I don't know if we ever ended upokay. He did end up sending money, but I don't know if we ended up still using Nana or not. There are some other players in the industry that would do cash exchanges, and I have clients that will do it, or that would have considered doing it for a little piece of the action. Nana alwaysor eKash always tended to make some mistakes on the pickup. Maybe there would be ten grand missing or twenty grand missing or something was always wrong. And, so, Chris would have to go back and chase it. So, he started to ask for additional resources. I don't believe we ever ended up using additional resources, because Nana was just consistently easier. 	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 10 1 1 2 1 1 2 1 1 1 1 2 1 1 1 1 1 1 1	 M. Morgan - 255 commission on it, a tiny bit, and he didn't want to use net anymore. But Nana might have been the only oneNana might have given me a new source or a new resource, and asked not to use his name, simply because we still allowed Chris to do business. So, it is possible that he was still doing business with eKash, just maybe not Nana. 1113. Q. And what else do you remember about this, Max, specifically? A. This specific one? 1114. Q. Yes, it is like \$300,000 amount, right? So, I am just thinking that it A. I remember it was 1115. Qwould be memorable Aprobably split up into U.S. and Canadian. 1116. Q. And what commission would you have received on this? A. I don't remember. I want to say I don't remember. I mean, it wasn't something we had a table set or a schedule, like some other payments. It was probably just a handshake agreement whereyou know, it was very small. So, oftentimes it would be a grand I would earn on it or whatever, because there wasn't really much I had to do, except
$\begin{array}{c}1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\3\\24\\25\end{array}$	 Page 95 M. Morgan - 254 2012, at 6:15 a.m.: "Hi Chris. I believe it is possible. Go ahead and send a wire to the account that is attached" Now, we don't have that attachment, but maybe you will recall, and you can tell us what was being proposed there? A. It would not have been my account, because he would have already had those wire details. So, I am not sure which account it was, off the top of my head, but it was probably one of eKash's accounts, and they had several. It might not have been in Canada. It might have been if he was sending U.S. funds especially. It could have been Wells Fargo or Bank of America or one of the larger banks in the U.S. 1111. Q. And then further up the chain you sayyou are writing to Chris: "Hi, Chris. Any update? I have my guy ready" Who was it that was going to A. I am not sure. 	$ \begin{array}{c} 1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\3\\24\\25\end{array} $	 Page 97

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 3 24 25	Sheet 26 Page 98 M. Morgan - 257 Canada, and they were governed by FINTRAC in many respects, and they wanted to make sure everything was done by the book. So, Lyndon wasthat was a lot of back and forth in trying to get them set up. But, I mean, the letter, nothing seems funny about the letter. That would be consistent. Banners was pretty good at tying in with traffic exchanges and things like that. So 1120. Q. Okay. Athat seems normal. 1121. Q. So, let's move forward, then, to tab 53. A. Okay. 1122. Q. This, as I read it, is an example of instructions from Chris to yourself, and it relates to a \$65,000 wire, and am I reading this correctly that Chris is instructing you to transfer the money to Parrot, or is the money being received from Parrot? What is being communicated here? A. To Parrot, the beneficiary is Parrot, so, to Parrot. 1123. Q. Okay. So, on the disbursement list that I keep coming back to, we presumably will see that \$65,000 going from an Aramor account, probably at CIBC to Parrot.	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 13 14 15 16 17 8 9 20 21 22 23 24 25	Page 100 M. Morgan - 259 aramorpayments.com e-mail address. So, was that the Google A. Yes. A. Yes. 1132. Qaccount. A. That is right. 1133. Q. Okay. So, presumably, as part of the e-mails that you have undertaken to obtain, we can see that India payout list A. Sure. 1134. Qas an attachment? Okay, great. I guess, moving forward, because these are also arranged chronologically, when you look at tab 56, we are in February of 2013 A. Yes? 1135. Qand the subject of this e-mail is "Chargeback alerts, 50 plus in 60 minutes"? A. Yes. 1136. Q. You were copied on it, Lyndon drafted it? A. Correct. 1137. Q. Was thereI take it that was unusual for A. Yes, that kind of spike was unusual. I can't recall what it was, but I think it was a tech glitch and maybe something else on the side of
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 13 14 15 16 7 18 9 20	Page 99 M. Morgan - 258 A. No, that would believeno, that would probably be BMO. 1124. Q. Okay. But we would see it on the BMO statements, then. A. Yes. 1125. Q. Okay. A. Now, would I end up having copies of these, toor would you guys be able to send this to me? 1126. Q. Sure, certainly. A. Yes. 1127. Q. Yes, certainly. A. Okay. 1127. Q. Yes, certainly. A. Okay. 1128. Q. And these are just examples, I mean. But obviously we are looking to Aramor, to the extent that you can, to give us the most complete A. Sure. U/T 1129. Q. Okay, then tab 55, we are back to Nana again. So, just take a minute and read this through	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Page 101

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1130.

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Α.

Q.

Okay.

like Alicia Varga had an India payout list?

Yes, that is right.

Q.

So, Alicia Varga had a...it looks

Okay. And, so, she is using an

M. Morgan - 259 e-mail address. So, was that the

directly to set up merchant accounts, not specific to Banners Broker. She was just a...kind of a

do anything with Banners Broker, but she was copied,

liaison with Allied Wallet with us, but she didn't

who initially used to work with Allied Wallet

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Sheet 27 Page 102	Page 104
Sheet 27 Page 102 M. Morgan - 261 I guess, as a courtesy. She had asked to be notified of anything that would affect her commission status. 1142. Q. So, just so I understand then, if Allied had an issue with chargebacks and Banners, would they go to Aramor, or would they go to Banners or both? A. Both. The client is always going to be Banners, but Aramor helps, kind of, smooth things over. You know, if there is a third-party program we need to institute to ensure that chargebacks are brought down, we would do that. If there are certain thingsyou know, there is oftentimes shouting matches between merchants and processors, we can mediate. If there is something administratively we can do, because we have seen these kind of things before, we can oftentimes sit down with the merchant, not all merchants, but Banners, being local, we could sit down with them and explain what needs to be done. 1143. Q. Right. A. And Allied is pretty hands-on, so 1144. Q. Well, you had an agreement with Allied, because A. Yes.	Page 104 M. Morgan - 263 1 out. What was the purpose of this meeting and this 2 e-mail? What was going on at the time? 3 A. Well, Lyndon ministered a lot of the 4 accounts, but I think UseMyServices had some 5 compliance issues with Banners Broker. They are 6 outlined here to some degree, integration with 7 Telpay, that was complete. So, that is on Lyndon's 8 end. That is a separate merchant account, I would 9 imagine. And then where I came into play, in terms 10 of kind of understanding what was next, Rajiv had 11 asked for merchant accounts or Canadian-based 12 merchant account for Stellar Point for webhosting, 13 virtual office services in the event to get event 14 maagement services. So, we covered all that ground 15 n. how they can stay in line with their 16 payment processors? 17 A. Yes, we were. You know, informally, 18 we have an interest in it because we are earning 19 commissions on it, we don't want to see any of the 19 in, and advise them as to what to do. So, yes
Page 103 M. Morgan - 262 1 1145. Qthat was undertaking number 6 2 A. That is correct. 3 1146. Qand to produce it, but did that 4 agreement 5 A. No, it had nothing to do with that. 6 We were not obligated to be notified of anything. I 7 think Allied just likes to strengthen the 8 relationship with their resellers, and it is just 9 good business practice to involve us. 10 1147. Q. So, tab 58, please. We are moving 11 forward towards the end of the relationship, but it 12 is March 21, 2013, the subject of this e-mail is 13 "Aramor update and joint action items". It 14 references a meeting in the first line. 15 A. Yes. 16 1148. Q. Between Lyndon, who drafted the 17 e-mail, yourself, Chris and Raj. 18 A. M'hmm. 19 1149. Q. So, do youand I take it that it 10 was an important meeting just by reviewing the 21 e-mail. Do you recall this meeting?	Page 105 M. Morgan - 264 1 A. All right. 2 1153. Q. And let's start with the second page 3 of the production. 4 A. Sure. 5 1154. Q. So, Chris is writing to you on April 6 the 3rd, 2013, to give you a time reference. 7 A. Yes. 8 1155. Q. He says: 9 "Maxwell, I hope all is well. Can you 10 please do another wire to Parrot Marketing? 11 Only \$15,000 of the \$60,000 has been 12 received so far, not to mention the missing 13 \$300,000. Please give me an update on 14 that. If there is a chance again to 15 receive cash in the States, let me know and 16 I will go pick it up" 17 So, there is a few thoughts that are in that e-mail 18 from Chris. 19 A. Okay. 20 1156. Q. Well, first of all, what did you 21 understand him to be asking you to do? 22 A. Well, that was our last 23 communication, I think. Chris had

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	Sheet 28 Page 106		Page 108
$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\9\\21\\22\\3\\24\\25\end{array}$	M. Morgan - 265 And I told him, you know, this is not something that I can administer over too heavily. You know, there is a huge risk in sending that kind of money. From what I understand, the money went missing. 1157. Q. You are talking about the \$300,000? A. That is right. He never ended up getting it. 1158. Q. So, what wasI mean, I kind of relate this back to the \$300,000 that we saw earlier. A. Right. 1159. Q. Was it the same \$300,000 that you were A. I think so, yes. 1160. Qmeant to transfer? A. Yes, because he mentioned the \$65,000. I think so. 1161. Q. And that was \$300,000 that you havethe indication in your e-mail was that you had somebody other than Nana, who was going to takereceive funds A. Right. 1162. Qand convert the money into cash for Chris. A. Right.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 3 24 25	M. Morgan - 267 least, up until now, and you say this may be one of your last communications with Chris, but A. Yes? 1166. Qyou had had a relationship with the guy for a while, a business relationship. A. Chris? 1167. Q. Yes. A. Yes? 1168. Q. Did you takewhat steps did you take to investigate what happened to the \$300,000 and pursue it? A. Limited ones, mainly because it was not my money. So, I had advised them time and time again not to do it. I wouldn't do it. So, you know, I am not going to advise a client to do something that I wouldn't do. I told him, no, you don't need to do that. He had already been stopped by the police with over \$100,000 on him, and takethe money taken andyou know, there had been a lot of inconsistencies with Chris, and I told him it is just not a good idea. So, I said, "If anything happens to the money, you know, I have a business to run. I am not going to be, you know, on the hook or searching for it, because once it is gone, it is gone".
$\begin{array}{c} 1\\ 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\\ 24\\ 25\end{array}$	A. Hight. Page 107 M. Morgan - 266 1163. Q. And that \$300,000, it appears it went missing. A. He was robbed, and 1164. Q. And? Sorry, who robbed him? A. I don't know the person directly. I had a client that had mentioned to me that he may have someone who can do it. I don't know if it was affiliated with Nana or not. I can't recall. It is possible that it was still Nana that did the transfer, but I had a client that said, you know, we can do this. I have a guy who can do it, and he will accept less. And, so, I had Chrisd not to do any transfers any longer. It is probably not the best idea, you know, and it is in Canada, et cetera, but he continued to want to do it, and he wanted cash. As I said, "I don't mind facilitating this for you, but I can't be responsible for the money". I said, "I don't know anything about these cash transfers". And Chris said, "I need to do it". So, it got done. Now, I don't know if it wasI don't think it was to our account directly. I believe it might have been to whoever's account it was that had the 300K that they to get. I will have to go back and check, but 1165. Q. I mean, what isyou had had, at	L	 Page 109 M. Morgan - 268 1169. Q. But did you take anydid you make any phone calls, or did you do anything to search for it? A. Yes and no. I might have made one or two phone calls, but if the money is gone, you are not getting anyone on the phone. So, I mean, I don't recall getting any specific answers. I just told Chris, "You are on your own". Chris didn't cry or get upset. He understood the risk. To me, it was just another \$300,000. 1170. Q. Okay. So, let's just follow up through the exchange, because there is two or three more A. Sure. 1171. Qabove the e-mail from Chris, I see your response, which is timestamped 5:02 a.m. April 8th, 2013. And you have said, "I have sent out an additional"let's just rewind for a second, becauselet's go back to Chris' first e-mail. There is the April 3rd one at 1:18. There is three matters that he is really contacting you about. One is the missing \$300,000 A. Yes. 1172. Q. He asks for an update, and then he says:

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	Sheet 29 Page 110		Page 112
1 4	M. Morgan - 269		M. Morgan - 271
1	"Is there a chance again to receive cash	1	So, it starts at the bottom of the first page. They
2	in the States? Let me know, and I will go	23	go together.
3	pick it up"		A. Okay. I don't know why I would have
4	So, what is that about?	4	written that, but it is possible that I sent an
5	A. I might have presented an option to	5	additional 20K. It might have been from their own
6	receive cash in the States, because eKash had more	6	money, though. So, I am not sure, but he seemed
7	money service businesses out there that were easier	7	very, very desperate to get the money sent to a
8	to get. So, they mentioned to me Los Angeles, New	8	specific place. So
9	York and very specific places, and I said to Chris,		1179. Q. But presumably, the 65I mean, I
10	"That might be an option if you want to do it". It		read this, and maybe perhaps you know, but the
12	was presented to him before, but kind of he didn't	11	\$65,000 that Chris is asking about doesn't have
13	like the idea of going and picking up that much cash and trying to get across the border with it, which	13	anything to do with the missing \$300,000. So, it seems like it is a separate
14	makes sense. I don't know if this was an act of	14	A. No, it is separate. 65 is separate.
15	desperation, where he felt that might be the only	15	1180. Q. So, what were youwhat was Aramor
16	other option, but he was very insistent on getting	16	doing in relation to the 65?
17	cash. So	17	A. I am not sure. I would have to go
18	1173. Q. Did you have an understanding or a	18	back and check, but I think we had discrepancies on
19	belief as to why he needed cash in these amounts at	19	their balances and a few other things, and we didn't
20	this time?	20	disburse all the money he had asked, based on the
21	A. No, he didn't seem in trouble.	21	fact that
22	Chris is a very calm guy. I don't know if you have	22	1181. Q. Okay.
23	met him already. You probably have. He didn't seem	23	Awe were maybe owed money or there
24	in trouble or anything, or desperate. Well, he	24	were certain inconsistencies with his balance. So,
25	seemed desperate in this situation, butno, I	23	we only had sent a portion of the 65 until we sort
	Page 111 M. Morgan - 270		Page 113 M. Morgan - 272
1	don't know. Why does anyone need \$300,000 in cash?		
		1	some of those issues out and then me saving I would
2	I don't know	1	some of those issues out, and then me saying I would
23	l don't know.	1 2 3	some of those issues out, and then me saying I would send an additional 20, some of those things might
2 3 4	l don't know.	3	some of those issues out, and then me saying I would send an additional 20, some of those things might have been sorted out.
2 3 4 5	I don't know. 1174. Q. How did he seem desperate in this	1 2 3 4 5	some of those issues out, and then me saying I would send an additional 20, some of those things might have been sorted out.
4 5 6	I don't know. 1174. Q. How did he seem desperate in this situation? A. Just a little more insistent on it, whereas in the past it was kind of a casual, "Can	3	some of those issues out, and then me saying I would send an additional 20, some of those things might have been sorted out. 1182. Q. Okay. Let's read up through the rest of the e-mail, and then we will revisit how we can figure it out, but immediately above that, Chris
4 5 6 7	I don't know. 1174. Q. How did he seem desperate in this situation? A. Just a little more insistent on it, whereas in the past it was kind of a casual, "Can you do this for me" and	3 4 5 6 7	 some of those issues out, and then me saying I would send an additional 20, some of those things might have been sorted out. 1182. Q. Okay. Let's read up through the rest of the e-mail, and then we will revisit how we can figure it out, but immediately above that, Chris deals with the 65 again, in the third paragraph of
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	M. Morgan - 273		M. Morgan - 275
1	mean, I had a guy that I had introduced him to, and	1	up"
2	said, "This is the guy you could send money to", and	2	A. M'hmm.
3	ended up running off with the money. So, you know,	23	1193. Q. So, what did you mean by that?
4	I introduced him to him, maybe by phone or by	4	A. Season? Well, there isthere was
5	e-mail, and	5	some deferred monies. We had some discrepancies
6	1185. Q. But you don't remember the guy's	6	accounting-wise. When we talk about our season, we
	name that you introduced him to?		are talking aboutwe have lulls in between the
8	A. Roger was a client of mine. Roger	8	year. We deal with a lot of sportsbooks and casinos
9	didRoger ran an Asian sportsbook, and had cash	9	and other businesses that have high seasons and low
10	pickups all over North America. So, he used eKash	10	seasons. So, you know, we told them we will rectify
11	to do that, as well. And Roger said, "I have a	11	some of these problems when we, you know, were able
12	notwork of anys that can do this for Chris"	12	
13	network of guys that can do this for Chris". I	12	to on our own. You know, it was really just a token
14	mentioned it to him in passing. I said, "Okay, you	14	answer or token response to the money so he knew he didn't have to worry very much. With respect to the
15	can speak to Chris directly", and that was it. Roger had introduced Chris to another guy who he	15	rest of the e-mail
16	sent the money to. There is a corporation involved,	16	
17	I am sure, and Chris did end up sending the money.	17	1194. Q. Well, just the first part, stopping there.
18	1186. Q. Did he sendwas it Roger, or an	18	A. Sure.
19		19	
20	associate of Roger's?	20	
20	A. It was an associate of Roger, and I	20	thatI read that as an acknowledgement on Aramor's part that when you have the money, someone is going
22	don't know if Roger is his real name. He was a very thick-accented Asian man, so I don't think that is	22	
23	his real name.	23	to give Chris \$30,000 to \$35,000. A. We felt responsible for the fact
23		23	that he had done Indian payments and other stuff
25	1187. Q. And where did Rogerwhere does he live?	25	with eKash. We felt somewhata sense of
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	D 115	·	
	Page 115 M Morgan - 27/	·	Page 117
	M. Morgan - 274	·	Page 117 M. Morgan - 276
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1 2	M. Morgan - 274 A. Well, I met him in Toronto, but I don't know where he lives. He is back and forth	1 2	M. Morgan - 276 responsibility to try to make him whole on money that he felt he was missing. At the same time,
1 2 3	M. Morgan - 274 A. Well, I met him in Toronto, but I don't know where he lives. He is back and forth between Hong Kong and here and Vancouver and L.A.	1 2 3	M. Morgan - 276 responsibility to try to make him whole on money that he felt he was missing. At the same time, there were still balance discrepancies. Our goal
1 2 3 4	M. Morgan - 274 A. Well, I met him in Toronto, but I don't know where he lives. He is back and forth between Hong Kong and here and Vancouver and L.A. and New York. He runs an Asian sportsbook, so	1 2 3 4	M. Morgan - 276 responsibility to try to make him whole on money that he felt he was missing. At the same time, there were still balance discrepancies. Our goal was to try to keep Chris happy and try to take care
1 2 3 4 5	M. Morgan - 274 A. Well, I met him in Toronto, but I don't know where he lives. He is back and forth between Hong Kong and here and Vancouver and L.A. and New York. He runs an Asian sportsbook, so 1188. Q. An Asian sportsbook where? In	1 2 3 4 5	M. Morgan - 276 responsibility to try to make him whole on money that he felt he was missing. At the same time, there were still balance discrepancies. Our goal was to try to keep Chris happy and try to take care of him. We didn't have an answer for him at the
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	Sheet 31 Page 118 M. Morgan - 277		M. Morgan - 279
1	A. eKash, but he is thehe was the	1	here, except on the agreement, I am not
		2	1209. Q. It says "Concept Seven LLC"
2	director.		
3	1201. Q. And so, Nana and the eKash, and the	3	A. Yes, I don't recall having an
4	missing funds, are you referring to the 65 or the	4	agreement with them, or having set them up with
5	300?	5	anything. So, it is possible we were about to go
6	A. When I said "seven-figure	67	into an agreement with them. I don't believe
67	settlements"?	7	Banners ever used this account, mainly because of
8	1202. Q. No, whenwere you talking about	8	the discount rate and the reserve. Chris thought it
9	the missing money that	9	was too high, and we had presented him several other
		10	options, and he said no.
10	A. The 30 to 35K, the 65, yes.	11	1210. Q. So, you are not familiar with Jack
11	1203. Q. Right, right.		
12	A. With respect to the rest, I had	12	O'
13	introduced eKash to some of my online gambling	13	A. No, and we presented him several
14	merchants to disburse cheques and some other	14	options like this, and he turned it down. So, it
15	services through his company, and he took from them	15	wasat that point, we had stopped processing with
16	liberally, or got that shut down for them. And	16	him, but we still had Allied doing a few things.
17	basically, those clients would have been different	17	1211. Q. Okay. So, just to conclude for the
18	than Chris in the sense that, you know, they were	18	day, obviously our focus right now is on
19	large sportsbooks. So, you know, all I have to do	19	understanding the money flows, and I think that the
20	is turn Nana over to them, and they will handle the	20	undertakings that we discussed at the beginning of
20	is turn Nana over to them, and they will handle the	21	the morning are going to be helpful for us in doing
21	rest. So, I don't know where Nana is now.	22	
22	1204. Q. You say:		that
23	"It has made negotiations on my end very	23	A. Okay.
24	tense"	24	1212. Qand
25	A. Yes, because they were long-time	25	A. Can I keep this?
	Page 119		Page 121
	Page 119 M. Morgan - 278		M. Morgan - 280
1	M. Morgan - 278	1	M. Morgan - 280
1	M. Morgan - 278 clients of mine. I vouched for his services, you	1	M. Morgan - 280 1213. Q. Please, yes. What, Max, do you
2	M. Morgan - 278 clients of mine. I vouched for his services, you know? They come back to me and say, "Hey, this guy	1	M. Morgan - 280 1213. Q. Please, yes. What, Max, do you think your timing is on answering undertakings?
2 3	M. Morgan - 278 clients of mine. I vouched for his services, you know? They come back to me and say, "Hey, this guy took a million dollars". You know, I am not a	1 2 3	M. Morgan - 280 1213. Q. Please, yes. What, Max, do you think your timing is on answering undertakings? A. On the undertakings, I am going to
2 3 4	M. Morgan - 278 clients of mine. I vouched for his services, you know? They come back to me and say, "Hey, this guy took a million dollars". You know, I am not a flight risk, so they know that. I meet them at	1 2 3 4	M. Morgan - 280 1213. Q. Please, yes. What, Max, do you think your timing is on answering undertakings? A. On the undertakings, I am going to saywe are at the end of May, third week of June,
2 3 4 5	M. Morgan - 278 clients of mine. I vouched for his services, you know? They come back to me and say, "Hey, this guy took a million dollars". You know, I am not a flight risk, so they know that. I meet them at different conferences, and it has made it hard for	1 2 3 4 5	M. Morgan - 280 1213. Q. Please, yes. What, Max, do you think your timing is on answering undertakings? A. On the undertakings, I am going to saywe are at the end of May, third week of June, to have everything complete.
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1 A. Sure.	1		INDEX OF UNDE	ERTAKINGS		
3 time.	1 2 3 4 5 6 7	REFE NUM	ERENCE PA IBER NUME	GE BER	QUESTION NUMBER	
A. Thank you. 5 1221. MR. WARD: We are concluded for today.	6 7	1	167	734		
	8	2	167	735		
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	10 11	4 5	184 186	809 819		
	12	6	187	828		
	13	7	197	873		
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M. Morgan - 282 M. Morgan - 282 INDEX OF EXHIBITS EXHIBIT PAGE NUMBER DESCRIPTION NUMBER M1 List of undertakings from April 13, 2015 examination of Maxwell Morgan 163 M3 Large black binder with 64 tabs 219 12	$\begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 101 \\ 112 \\ 131 \\ 4 \\ 156 \\ 177 \\ 189 \\ 201 \\ 222 \\ 232 \\ 4 \\ 256 \\ 277 \\ 288 \\ 230 \\ \end{array}$	Page	REPORTER'S NOTE: Please be advise advisements and refi their guidance only, necessarily accurate Reporting Services In	d that any unde usals are provio and do not pur and are not bin nc. ne foregoing to bove-noted pro	ertakings, objection ded as a service to port to be legally bi nding upon Victory be a true and accu occeedings held before to the best of my si ect:	Verba

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Court File No.: CV-14-10663-00CL

ONTARIO SUPERIOR COURT OF JUSTICE (Commercial List)

AB/Im

IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1992, c.27, s.2, AS AMENDED AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE ISLE OF MAN WITH RESPECT TO BANNERS BROKER INTERNATIONAL LIMITED APPLICATION OF MILES ANDREW BENHAM AND PAUL ROBERT APPLETON, IN THEIR CAPACITY AS JOINT LIQUIDATORS OF BANNERS BROKER INTERNATIONAL LIMITED, UNDER PART XIII OF THE BANKRUPTCY AND INSOLVENCY ACT (CROSS-BORDER INSOLVENCIES)

This is the Examination of LORENZO GUARINI, pursuant to Section 163 of the Bankruptcy and Insolvency Act, taken at the offices of CASSELS BROCK & BLACKWELL LLP, Suite 2100, Scotia Plaza, 40 King Street West, Toronto, Ontario, on the 21st day of April, 2015.

A P P E A R A N C E S: DAVID S. WARD } -- for the Receiver ERIN CRADDOCK } CHRISTOPHER HORKINS } LARRY ELLIS }

ALSO PRESENT: Gillian Goldblatt Philip H. Gennis

		Paq	• 640
L. Guarini - 2	1 2 3 4 5	4.	L. Guarini - 4 document book that I have put in front of you? A. Yes. Q. Okay, and so what we have here is an extract from an officer's register for Stellar Point Inc.
INDEX OF PROCEEDINGS PAGE NUMBER	6 7 8 9 10 11 12 13	5. 6.	 A. M'hmm. Q. And it indicates on the third line that Lorenzo Guariniit's yourself, correct? A. Yes. Q. "Was vice-president of Stellar Point Inc. between September the 28th, 2009 and September the 18th, 2013" Do you see that?
LORENZO GUARINI, affirmed Examination by Mr. Ward 3 - 165 Index of Exhibits 163 Index of Undertakings 164 Certificate 165	14 15 16 17 18 19 20 21 22 23 24 25	7. 8. 9.	A. Yes, I do. Q. And is that correct? A. I think so. Q. And you say "[you] think so", was thatwere you involved in corporate governance issues with respect to Stellar Point or was there somebody else who sort of looked after that on your behalf? A. Yes, if I cannot to get into a story, but I have to be able to get into the story so, you guys will understand where I am coming from. Q. Sure.
Page 3 L. Guarini - 3 1 LORENZO GUARINI, affirmed 2 EXAMINATION BY MR. WARD: 3 1. Q. Good morning, Mr. Guarini. Am I 4 pronouncing your name right? 5 A. Yes, perfect. 6 2. Q. Terrific. So, just prior to going 7 on the record I introduced the people around the 8 room. And we are here today to investigate the 9 business and affairs of Banners Broker and Stellar 10 Point and companies that are related to them. We 11 understand that you had some involvement with those 12 companies over the years, in some capacities, and I 13 am going to give youwe will chat about that 14 today. 15 We are particularly interested in any 16 information that you may have in terms of how people 17 were paid and how the companies interacted with 18 investors around the world and the business model 19 and the flow of funds, as between banks and payment 20 processors and whatnot. And I appreciate that some 21 of those issues you may know nothing about,	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 3 24 25	Page 10.	L. Guarini - 5 A. So, years ago, I met this Rajiv Dixit, because I am a network marketer. I took this guy who was basically broke and took him under my wing. I have been in network marketing for years. And I taught this guy many things about network marketing and things like that. So, we became friends. And we got involved in a couple businesses together before that. When I got involved with this Banners Broker was through Rajiv Dixit. And I was brought into Banners Brokerfirst, I was coming in as a customer of Banners Broker. And then, as it went along, I started with them as support, a support person for Banners Broker. I knew nothing of online advertising. I'm not very good online. So, I didn't understand advertising funnels and all this other thing. So, when it came to doing business, Rajiv Dixit climbed the ladder with these guys, okay. And instead of me having positions or advertising panels, okay, like, I purchased with the company, they wouldn't allow me to bewhat's the word I'm looking for? I wasn't allowed to partake, okay? I either worked for the company or I was just like a regular person joining in the company. Q. Not an affiliate?

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	L. Guarini - 6 A. They wouldn't allow me to be an affiliate. At first I was, and I made my first, I think aroundI don't know the exact amount, I think, \$360 and then they cut me off and I wasn't allowed to be an affiliate anymore. Although I did know people and the people that I knew, friends of mine that had joined the company and then started building from there, but they didn't allow me. And so what I did wasI didn't want to have to come to Toronto. I was retired from Chrysler and I didn't want to have to come downtown Toronto, as you can see today, it was a nightmare just to park. And so I agreed that I would do support, so long as they could teach me and teach me and teach me, because I'm not that quick especially when it comes to computers. So, to be quick about it, that's where it all started, that's where it all began. And at that time, he asked me if I could work four hours from home. He said, "You don't have to come to Toronto", right Q. Dixit said this? A. No, this was Chris, Chris Smith. This is long before Stellar Point. And this was from Banners Broker. I don't know if it's	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	 L. Guarini - 8 chiefs at that time, when I first started, was Chris Smith and Kul Josun, okay? Those were the two guys that were basically in charge. They were the big guys. And Raj Dixit got involved at that time, too, but he didn't have the power, let's just say. He wasn't the principal boss. Q. Okay. A. As the company started to grow, within that first yearI mean, from the beginning it started with, really, with my friends. It started in Ottawa, okay, with some friends in Ottawa, and then from Ottawa, it went to New York, Florida, California and then Europe, and it just exploded, it went crazy. Q. Let me just interrupt you for a second. And then I will let you finish the story, okay? A. Yes, no problem. Q. But I want to put a time period on this, because if you look at the document that I have put in front of you, it looks like you were involved with Dixit in Stellar Point in the fall of 2009. And we know Banners Broker didn't start up until at least a year later. A. Yes, so I don'tthat's why I said
Pa 1 2 3 4 5 6 1 7 8 9 10 11 12 13 1 14 15 16 17 1 18 19 1 20 21	 ^{ge 7} L. Guarini - 7 international or whatever, but that's what it was, that's where it began. And I did support and he said, "only four hours." From four hours, I found myself going from four to fourteen hours. I got paid \$200 a week. Q. For how many hours, four hours a day? A. Well, yes, and sometimes six, sometimes ten, it all depended. But I did it because I was home and, you know, it was money. So, it helped out. And that was at the beginning of this company. Q. So, 200 hours a week, customer support, from home, at the beginning. Does that sound A. Not 200 hours a week? A. Yes. Q. Right, okay that is what you were paid? A. Yes. Q. Okay. A. So, to move along further, the company started to grow within the first six months, eight months. Now, in the meanwhile, the company 	$ \begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 24 \\ 25 \\ \end{array} $	 Page 9

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	Sho	et 4 Page 10		Page	e 12
	. 0110	L. Guarini - 10		5	L. Guarini - 12
1		who made the \$360?	1	33.	
2		A. Yes, I would say probably in the	2		responsibilities changed, right, you became more
3		first six months, I was	3		involved?
4	24		4		A. Yes.
5		A. Yes.	5	34.	
6	25		6		are back at the beginning, you are no longer just
7		beginning, it's fair to say?	7		doing customer support. You are no longer working
8		A. Yes, absolutely. TheyI mean,	8		from home, so tell us about that.
9		there was two young guys. They were programmers.	9	25	A. Yes, now, the company has grown.
10 11	26	There was Kul Josun, there was Chris and Raj.	11	35.	
12	26	. Q. Right. And Raj introduced you to Banners Broker?	12		A. And the guy that was going around was Kul Josun, okay. So, he was going around the
13		A. Yes.	13		different places and doingwell, I won't say
14	27		14		presentations, he was brutal at itbut he was
15		interrupted, so why don't you	15		going around basically saying, "I'm the owner of
16		A. No, it's okay.	16		Banners Broker," blah, blah, blah. And the company
17	28		17		growing from thereon in, it had grownI wish I
18		A. So, I'm trying to get back to it.	18		could remember the exact date, but they had a
19		I'm just trying to paint you the picture of what	19		bigwhat's the wordbig hoopla in Portugal,
20		this person was, okay. Especially Raj. Now we	20		okay? Their first grand opening, let's just say.
21	00	became friends. I did so much for this guy.	21		And people flew in to Portugal from everywhere. And
20 21 22 23	29		22		there was at leastI'd say at least 1,000 people
23		story, then, is at what point did you stop being an	23 24		there. The hotel was all jam-packed with people coming from everywhere in Portugal.
24 25		investor? And I know they asked you to close your account at some point and then you had some	25		At that time, whatever happened between Kul
120		account at some point and then you had some			
	Dag	. 11		Dage	
	. Page	e 11 I Guarini - 11		Page	e 13
1	. Page	L. Guarini - 11	1	Page	e 13 L. Guarini - 13
1 2	. Page	L. Guarini - 11 different responsibilities. So, tell me about that.	1		L. Guarini - 13 Josun and they brought inKul Josun got involved
1 2 3	. Page	L. Guarini - 11 different responsibilities. So, tell me about that. A. Well, the company was starting to	1 2 3		L. Guarini - 13 Josun and they brought inKul Josun got involved withI'm trying to remember his name. He was another clown.
3	. Page	L. Guarini - 11 different responsibilities. So, tell me about that. A. Well, the company was starting to grow, but, I guess they said it would have been a conflict of interest for me to be doing the business	1 2 3 4		L. Guarini - 13 Josun and they brought inKul Josun got involved withI'm trying to remember his name. He was another clown. Q. John Rock.
3	. Page	L. Guarini - 11 different responsibilities. So, tell me about that. A. Well, the company was starting to grow, but, I guess they said it would have been a conflict of interest for me to be doing the business and then get paid as an employee, because I am an	1 2 3 4 5		L. Guarini - 13 Josun and they brought inKul Josun got involved withI'm trying to remember his name. He was another clown. Q. John Rock. A. That's it, John Rock. So, these two
3	. Page	L. Guarini - 11 different responsibilities. So, tell me about that. A. Well, the company was starting to grow, but, I guess they said it would have been a conflict of interest for me to be doing the business and then get paid as an employee, because I am an employee of the company. And people out in the	1 2 3 4		L. Guarini - 13 Josun and they brought inKul Josun got involved withI'm trying to remember his name. He was another clown. Q. John Rock. A. That's it, John Rock. So, these two guysand I know who John Rock is through the
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	_ Sheet 5 Page 14	_	Page 16
	L. Guarini - 14		L. Guarini - 16
1	for Canada, from some guy in Germany. And he bought	1	and everything else. And we went to Ottawa
2		2	together. We went to some placeswe went to
3	When we had all gone to Portugal and had	23	Florida together. Like, a good guy. A good-hearted
4		4	guy, very charming. But I don't understand why he
4	line big hoopia that was going on, bonn hook and hun	5	did what he did. Received the way the company was
5			did what he did. Because the way the company was
6		6	growing and everything was going well, I am sure
7		7	that the company was making profits and why would
8		8	you basically try to screw things up. And
9	they were going to take this company and join it	9	unfortunate, that's what happened in Portugal, of
10	together with Banners Broker, right. And they	110	whichever time it was. I am not really good with
11	figured that if they had all these leaders that were	11	dates, guys, okay, but I will do the best that I
12	onboard, Kul was now going to Chris and saying, "You	12	can.
13	have no choice", right, "We are going to meld these	13	45. Q. So, just, let's talk about Josun a
14		14	bit more, becauseI mean, we are at the point
15		15	where he leaves Banners Broker.
		16	A. Sure.
16			
17	39. Q. Yes.	17	46. Q. So, when you went to Portugal, what
18		18	was your responsibility? What were you doing at
19		19	Banners Broker? Was it still customer support?
20	And I can't remember the guy's name, but it was an	20	A. Yes, customer support. I mean, they
21	Indian fellow from the U.K., at the time. This is	21	brought me along, that I didn't really need to be
22	where you will see Kul Josun and Chris split, okay.	22	there. But they brought me along and that was
23	Whereas Chris said, basically, "I'm the principal	23	awesome, I mean, it was great. But basically, I was
24	owner of BB", and they booted Kul Josun out. Online	24	always there helping anybody, everybody that needed
24 25	they put down, "We wish him well. He's going in a	25	help or needed any type of support.
·	. Page 15		Page 17
	L. Guarini - 15		
	L. Gualifii - 15		L. Guarini - 17
1		1	47. Q. So, you were working with Josun
1 2	different direction, wish him well", whatever.	1	47. Q. So, you were working with Josun
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		• 64
1 2 3 4 5 6 7 8 9 10 11 23 14 15 16 17 18 19	Sheet 6 Page 18 L. Guarini - 18 Portugal? A. Not to the best of my knowledge, no. 55. Q. So, tell me some more things about Josun, in terms of what was he doing at Banners. For instance, why did you travel to Ottawa, Florida, New York and Vancouver with Kul? A. It was to help grow the company, okay? Because there were presentations that were being set up. There were a lot of people that were coming to see what Banners Broker was about. So, they wanted to know about what everything Banners was doing. So, Ottawa was a lot of my friends, a lot of my people. So, they would come, and we set up a meeting, a hotel meeting and things like that. And Kul would come and I would more do the presentation than he would, because he really wasn't very good at doing presentations. Like I say, good guy, he was charming, everything else, but he was not a good presenter.	Page 20 L. Guarini - 20 1 he was doing okay. Just based on him bragging. 2 61. Q. Yes. 3 A. But he didn'tI can't say the 4 amount, because I don't really know. But I know the 5 way he was spending 6 62. Q. Fair enough. What was his lifestyle 7 like? 8 A. Oh, he had a good lifestyle. He had 9 a good lifestyle to the point where all of a sudden 10 he got an Audi A8, and it wasn't just that. 11 Whereout of the U.K., I also have friends there, 12 okay. So, they would go to the meetings in the U.K. 13 and then say, "Yes, Kul was there." But a very good 14 friend of mine said, "Man, like he really acts like 15 a hotshot, right?" I said, "What do you mean?" 16 "Well, like he's out there buying drinks for 17 everybody," blah, blah, blah. 18 63. Q. So, you saw the Audi A8? 19 A. Oh, yes. 20 64. Q. And you understood that to be what,
22 23 24 25	 56. Q. So, was it just the two of you guys that would go to these cities? A. No, sometimes Chris would come. Sometimes Dixit would come. So, when it came to goingwhat's it called, yes, Trinidad and a couple 	21a Banners Broker car or something he purchased with22his own money?23A. Oh, no.2465.Q. Because he was bragging, right?25A. Yes. And so I don't know if he
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 L. Guarini - 19 of other places, it would be Kul and Raj, Kul and Raj. If you are talking the nice, warm exotic places, Kul and Raj would go. When it was just your regular Ottawas andthey really didn't want to go. 57. Q. So, in any event, Ottawa, Florida, Vancouver and New York, you would go, you would to hotel presentations to affiliates? A. Yes. 58. Q. And would you guys collect money from them? Or what was the pitch? A. No, if they wanted to sign up, they could sign up. But never accepted money. I never accepted money. Nor did I have the authority to, nor would I. Because I didn't want to be responsible for people's money. 59. Q. And so just staying on the topic of Kul. A. Yes. 60. Q. Do you know how he was paid for what he did? Did you have any sense of that? You 	Page 21 L. Guarini - 21 1 bought it with his own money, with Banners Broker 2 money. I 3 66. Q. Tell me about the bragging. Like, 4 just describe the sorts of things he would say. 5 A. Well, basically, he said, "This is a 6 lifestyle." I mean heand with all due respect, 7 I am not racist in any way, but it's likeall of a 8 sudden it's likeand it seemed like, especially 9 the Indian men, they get to a certain point and they 10 think that their life is a much better standard than 11 everybody else. And they like to look down. 12 I know that from experience, from Rajiv 13 Dixit and all that other stuff. I don't care for 14 that kind of stuff, but Kul had an arrogance, okay. 16 But he let people know it. 17 G7. Q. What else did he spend his money on? 18 A. I mean, he was always wining and 19 dining. From what I heard, again, it's hearsay and 10 I know it isI'm saying "hearsay", but I know that
21 22 23 24 25	mentioned some rumours earlier. But just leaving aside the rumours, what do you know about how this guy was paid by Banners Broker? How well did he do? A. I would be lying if I answered, because I don't know the exact amounts, but I know	 I know it wasn't just hearsay. As much as it was women, if you know what I mean. And not just him, Dixit. These guys would go and spend five grand. And I knew not to doubt it, because I saw the way they were doing things.

r	Sheet 7 Page 22	. —	_ Page 24
	L. Guarini - 22		L. Guarini - 24
11	But if that was what they were getting paid	1	A. Yes.
2	in profits and whatever, so be it. But these guys	2	78. Q. And then how did thatdid that
		3	change your role within the company, did it affect
3	lived high off the hog at that time, okay, at that		
4	time. That's what they were doing.	4	you in any way? What happened next?
5	68. Q. Again, we are just talking about	5	A. No, not at the beginning. That's
6	Josun now.	6	when Dixit moved into his role as the next Kul
7	A. Yes.	7	Josun, let's just say.
8	69. Q. And we will get to Dixit in a	8	79. Q. Okay, and just explain that a bit
0	minute. But what also did leaun around his manou an?	9	more. So, how did Dixit become the next Kul Josun
9	minute. But what else did Josun spend his money on?		
10	Can you think of any other examples? Did he buy	10	after Portugal?
11	jewellery? Did he travel? Did he have investments?	11	A. Well, I mean, he has this way. I
12	A. I don't thinkI think maybe a	12	don't know what it is about him. He has this way of
13	watch. But I don't think I don't remember him	13	convincing people to part with their money. And he
14	with jewellery and things like that. Unless he	14	has this way of convincing. He went in there to
15		15	convince Chris that, basically, this company wasn't
10	bought it for his kids or whatever. I don't		convince online that, basically, this company washe
16	remember that.	16	going to succeed without him. That he needed Raj or
17	70. Q. What about bank accounts? Money	17	Chris was going to falter. And so, again, from
18	that may be offshore or anything like that? Do you	18	there, that's where this guy came in to change
19	know anything about that?	19	things.
20	A. I don't recall. For Kul, I don't	20	80. Q. Dixit did?
20 21	know. I know that he set uphe had some account,	21	A. Yes.
121	Lem net euro if it's Europe. Deseuse from whet I	22	
22 23	I am not sure if it's Europe. Because from what I		
23	was hearing, was that he was collecting cash from	23	next. What did he do, for instance, to change
24	people in Europe. And he put it in some bank	24 25	things?
24 25	account. It could be Europe, but most likely	25	A. The company was still growing. And
	Page 23		
	Page 23 Guarini - 23	<u> </u>	. Page 25
1	L. Guarini - 23	1	. Page 25 L. Guarini - 25
1	L. Guarini - 23 Europe.	1	L. Guarini - 25 L. Guarini - 25 I mean rapidly growing. So, at that time, Dixit
1	L. Guarini - 23 Europe. 71. Q. And who told you that?	1 2	L. Guarini - 25 L. Guarini - 25 I mean rapidly growing. So, at that time, Dixit came in and here's where I got the Titleist thing
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1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 12 3 4 5 6 7 8 9 20 11 12 3 14 5 16 7 8 9 20 11 12 11 11	L. Guarini - 23 Europe. 71. Q. And who told you that? A. I heard that from Dixit. 72. Q. And you heard that after Josun had been fired or before? A. I would say around the samearound that time. 73. Q. That would make sense. A. Yes. 74. Q. Around the Portugal convention? A. Yes. 75. Q. And again, just let's talk a little bit more about Josun. I mean, he hadyou had never been to his house. Did he talk about his house or things for his children? A. We knewwhat I knew that he lived with his sister. That's all I knew. I didn't know whether he had a house or not. Neverno, never visited his home or anything. 76. Q. So, something happened in Portugal. There is the attempt to take over, that you	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	L. Guarini - 25 L. Guarini - 25 I mean rapidly growing. So, at that time, Dixit came in and here's where I got the Titleist thing from, okay? Okay, "I'm going to be the chief executive officer of building this business. You're going to be in charge of advertising. You're going to be executive of this", and he started giving people titles and responsibilities. Chris just let him go about his thing. So, I didn't care. I was just doing my job, right. And at that time, still support. And thennow they needed somebody to go to the U.K., to certain places, to start doing the presentations. And I was asked if I was okay to travel. And I said, "Okay, this sounds exciting. No problem." So, I was going to be able to travel and meet with the people, do the presentations and that's what I did. That was the beginning of that. So, basically, now, I think, I was the new Kul. You know, travelling abroad. 82. Q. Did you get a title at this point? Did Raj give you a title? A. Brand ambassador.
1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 12 3 4 5 6 7 8 9 20 11 12 3 14 5 16 7 8 9 20 11 12 11 11	L. Guarini - 23 Europe. 71. Q. And who told you that? A. I heard that from Dixit. 72. Q. And you heard that after Josun had been fired or before? A. I would say around the samearound that time. 73. Q. That would make sense. A. Yes. 74. Q. Around the Portugal convention? A. Yes. 75. Q. And again, just let's talk a little bit more about Josun. I mean, he hadyou had never been to his house. Did he talk about his house or things for his children? A. We knewwhat I knew that he lived with his sister. That's all I knew. I didn't know whether he had a house or not. Neverno, never visited his home or anything. 76. Q. So, something happened in Portugal. There is the attempt to take over, that you described.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Page 25
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1 3 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 14 5 6 7 8 9 0 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 17 10 10 11 12 11 12 11 12 11 12 11 11 12 11 11	L. Guarini - 23 Europe. 71. Q. And who told you that? A. I heard that from Dixit. 72. Q. And you heard that after Josun had been fired or before? A. I would say around the samearound that time. 73. Q. That would make sense. A. Yes. 74. Q. Around the Portugal convention? A. Yes. 75. Q. And again, just let's talk a little bit more about Josun. I mean, he hadyou had never been to his house. Did he talk about his house or things for his children? A. We knewwhat I knew that he lived with his sister. That's all I knew. I didn't know whether he had a house or not. Neverno, never visited his home or anything. 76. Q. So, something happened in Portugal. There is the attempt to take over, that you described. A. Yes. 77. Q. And Josun was fired by Smith and	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23 24	 Page 25
1 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 14 5 16 17 10 10 10 10 10 10 10 10 10 10 10 10 10	L. Guarini - 23 Europe. 71. Q. And who told you that? A. I heard that from Dixit. 72. Q. And you heard that after Josun had been fired or before? A. I would say around the samearound that time. 73. Q. That would make sense. A. Yes. 74. Q. Around the Portugal convention? A. Yes. 75. Q. And again, just let's talk a little bit more about Josun. I mean, he hadyou had never been to his house. Did he talk about his house or things for his children? A. We knewwhat I knew that he lived with his sister. That's all I knew. I didn't know whether he had a house or not. Neverno, never visited his home or anything. 76. Q. So, something happened in Portugal. There is the attempt to take over, that you described. A. Yes.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	 Page 25 L. Guarini - 25 I mean rapidly growing. So, at that time, Dixit came in and here's where I got the Titleist thing from, okay? Okay, "I'm going to be the chief executive officer of building this business. You're going to be in charge of advertising. You're going to be executive of this", and he started giving people titles and responsibilities. Chris just let him go about his thing. So, I didn't care. I was just doing my job, right. And at that time, still support. And thennow they needed somebody to go to the U.K., to certain places, to start doing the presentations. And I was asked if I was okay to travel. And I said, "Okay, this sounds exciting. No problem." So, I was going to be able to travel and meet with the people, do the presentations and that's what I did. That was the beginning of that. So, basically, now, I think, I was the new Kul. You know, travelling abroad. 82. Q. Did you get a title at this point? Did Raj give you a title? A. Brand ambassador. 3. Q. Global brand ambassador, does that sound right?

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	DIIC	L. Guarini - 26		L. Guarini - 28
1		"Okay, what's a 'brand ambassador'?" Okay, whatever	1	feelings were on sponsor monsters.
2		it is. But that's what he did. And you will see,	2	91. Q. On what?
3		even with Stellar Point, you will see people had	3	A. Sponsor monsters.
4		executive secretary, executive vice-this, and all	4	92. Q. Tell me what a sponsor monster is.
5		this other stuff, and we are just regular people.	5	A. A sponsor monsterin network
6		"What's my job?", but that's what he does. He does	6	marketing, a sponsor monster is a guy that, "I want
7	04	the title thing.	6 7 8	all of you to sign up with me, because when you sign
8	84.		9	up with me, I get a commission." But as a leader I
9 10		A. And so with Kul at that time, the	10	don't like sponsor monsters. Sponsor monsters are the guys that are going to sign everybody up and
11		rumours had gone out, he had taken off with anywhere between \$3 to \$5 million, we figure around \$4		say, "Thanks for signing up. See ya." If you need
12		million. This came from Dixit.	12	help, it's my job to help you. Because, look, I got
13	85.		13	paid a commission for you signing up with me to do
14	00.	A. Yes.	14	business with me. And all of you, it should be my
15	86.		15	responsibility to help you, but these sponsor
16		A. Well, even Chris. But Chris just	16	monstersbasically, I was chastising them, saying,
17		wasn't 100 percent sure exactly how much he made off	17	"You should support your people." Instead of
18		with. I only know a lot of things from what I have	18	saying, "Well, I'll sign up all these people and if
19		read on the Spergel report or whatever, which has	19	you guys got an issue, just call support." You
20		just shocked the crap out of me on some of the	20	know, it's a network marketing no-no, you shouldn't
21		things that I have read in there.	21	do that, because you will lose respect.
22		But, the very guys that have started this	21 22 23	93. Q. Okay, got it. So, Manchester,
23		whole thing are some of the bad guys in this whole	23	Irelandwas that the same trip, by the way?
21 22 23 24 25		thing, including Ian Driscoll. So, I will get to	24 25	A. No, not all in the same trip, no. 94. Q. So, where did you go next?
L	D	that later, right.		94. Q. So, where did you go next? Page 29
	Page	e 27 L. Guarini - 27		L. Guarini - 29
1	87.		1	A. These aren't in order.
2	• / ·	will get to Driscoll later.	2	95. Q. They are not in order?
3		A. Yes.	23	A. No, I can't tell youI can't tell
4	88.	Q. Let's talk about the time frame you	4	you in order. I know I've done Portugal, Poland,
5		became the new Kul. So, it was sometime after	5	Ireland, England, Italy, Trinidad, Jamaicawhat am
6		Portugal?	6 7	I missing?
7		A. Yes.		96. Q. Spain?
8	89.	Q. So, just tell us what you did, where	8	A. Spain, thank you.
9		you travelled, who you were with, what you saw, what	9	97. Q. Dominican Republic?
10		you heard.	10 11	A. Yes. 98. Q. Anywhere else?
11		A. I went to the U.K., to England. Met	12	
12 13		with Ian Driscoll. Had meetings in Manchester. I	13	A. I am trying to remember. I'm trying to think. I should have just brought my passport,
14		forget the small town, there was another small town I had a meeting in. And then I had personal	14	because I have the stamps. It was very exhilarating
15		meetings, one-on-one, one with five people another	15	at the beginning.
16		one with five people, every half hour on the hour.	16	99. Q. So, you were travelling a lot,
17		So, if people were having problems or weren't sure	17	Lorenzo, and so justand we are not going to go
18		what was happening with their accounts or	18	through these trips one at a time, because we don't
19	90.	Q. Yes.	19	have that much time. But just tell me who you
1		Adidn't know what to do, I was	20	travelled with, and why you went to these countries
20			21	and what you did.
20 21		there to help them to support. Had meetings with	121	
20 21 22		all these people. I also went to Ireland and	22	A. Okay. A couple timesonce I
21 22 23		all these people. I also went to Ireland and basically did the same thing. Had a big conference.	22 23	A. Okay. A couple timesonce I travelled with Sabih. Her name is Sabih Abbasi.
20 21 22 23 24 25		all these people. I also went to Ireland and	22	A. Okay. A couple timesonce I

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1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 20 21 22 3 24 25	 Sheet 9 Page 30 L. Guarini - 30 sent her along with me to give me a hand. Another time, who did I travel with? My son came along with me in the end. And he was coming with me as my assistant. I also travelled to Italy with the now Mrs. Raj Dixit, StephanieI can't remember what her last name was before the marriage. 101. Q. Schlacht? A. Schlacht, that's it. 102. Q. Okay. A. So, she came to Italy with me 103. Q. Just you and Stephanie, or was Dixit there too? A. No, it was just me and Stephanie. 104. Q. But presumably she was working at Banners at that point, Stephanie was, right, that's why she was travelling with you? A. Yes. She was travelling with me because she had come to do theshe was teaching the ones in Italy how to do the business and that. So, she came with me. I was doing presentations. So, she was there to assist me. 105. Q. Was this all in English, by the way? You don't speak Italian? A. In Italy? Oh, I speak Italian. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 L. Guarini - 32 yourself, you were always with somebody else, is that fair to say? A. No, some of them I was by myself. But most of the time I had somebody. 115. Q. And you travelled with Kelly, sometimes, as well, is that right? A. Kelly came to Portugal with me and Kelly came to England with me, because I told them I wouldn't go unless they let me take her with me, because, you know, it was around Christmastime and basically, I wasn't getting any holidays out of the deal, so I wanted her to be able to come with me. 116. Q. Now, was Kelly ever working for Stellar Point or Banners Broker? A. Never. 117. Q. Okay. And justokay, so we are going to finish off on the travel, but you were either travelling with Stephanie? A. Yes, just once with Steph. 118. Q. Sabih or your family? A. Once with Sabih. And most of the time, the rest of the time I was either by myself. And then near the end, my son came with me as my assistant. 119. Q. And you were global brand
1 2 3 4 5 6 7 8 9 10 11 22 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23 24 25	Page 31 L. Guarini - 3	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	 Page 33 L. Guarini - 33 ambassador, that was your title? A. Yes. 120. Q. So, were you reporting to Raj, during this time period? Was he your boss? A. No, Chris. 121. Q. To Chris? A. Yes. Chris, I mean, Raj would arrange it, but Chris was still my boss. 122. Q. And so how frequently would you meet Chris during this period? Would you speak to him every day, some days? A. No, not every day. No, just some days. I was just out travelling, doing my job. 123. Q. Who decided where you would go? Whose decision was that? A. That waswell, Dixit would do most of that. 124. Q. So, how frequently were you dealing with Raj, during this period? A. Fairly frequent. You know, just, where do I go next? 125. Q. But you never travelled with him? A. Not really, no. 126. Q. Did you socialize with him otherwise, like apart from travelling?

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1 A. Oh, yes. L. Guarini - 34 1 A. Our tail didescribe that. Would your A. Our tail for the yout you go to his house, would he go to your house? Like, just tell me what you remember on that front. A. Ves. 6 A. Our taillies got together maybe he told you, he may have been bragging about. 7 twice. Honestly, my wife dich't really like him too much at all. And my son dicht really like him too much at all. And my son dicht really like him too me. 7 11 128. Q. Right. 7 12 A. So, we talked all the time. We did not net tails gath the yout you within BR, things that 1 saw. If there was problems or issues or even good things. 139. Q. Well, hewas quite a little bit different. Lgot to see a lot more of him than 1 13 gapears that be was one of the top guys. So, what differe torm, because I didn't want to come to T.O., you know. But once in a while I would come to T.O., you know. But once in a while I would come to T.O., you know. But once in a while I would come to T.O., you know. But once in a while I would come to T.O., you know. But once in a while right? 142. Q. Well, let's just talk about that for a minute. Whatd you know about kull/Ulos?	Cuerini 00	Page 36		Sheet 10 Page 34
2 127. Q. And just describe that. Would your 3 families get together, would you go to his house, 4 would he go to your house? Like, just tell me what 5 A. Our families got together maybe 7 twice. Honestly, my wife didn't really like him too 8 much at all. And my son didn't really like him too 9 much at all. And my son didn't really like him too 9 much at all. But they put up with him because of 10 me. 11 128. Q. Right. 12 A. So, we takked all the time. We 3 didn't spend time together as friends, per se. I 14 would go in, I would talk to him about things that 14 would go in, I would talk to him about things that 15 were happening within BE, things that I saw. If 16 there was problems or issues or even good things. 17 129. Q. But did you have an office at this 18 point? Were you, like, working from the Whitby 19 office at Stellar Point? 20 A. Weil, yes, hey put an office in 129 Q. But did you have an office in 129 Q. Weil, let's just talk about that for	Guarini - 36	L. G		L. Guarini - 34
3 families get together, would you go to his house, would he go to your house? Like, just tell me what you remember on that front. 3 137. Q. Just things that you saw or heard or he told you, hen may have been bragging about. 6 A. Our families got together maybe twice. Honestly, my wife dich't really like him too much at all. But they put up with him because of me. 7 138. Q. Because Banners Broker was hugely successful, right? 11 128. Q. Right. 139. Q. We have talked about that. 11 128. Q. Right. 139. Q. We have talked about that. 11 128. Q. Right. 139. Q. We have talked about that. 13 didn't spend time together as friends, per se. I would go in, I would talk to him about things that would go in, I would talk to him about things that. 14 A. Yes. 14 would you have an office at this point? Were you, like, working from the Whitby 15 A. Owli, he was quite a little bit 16 there was problems or issues or even good things. 16 amough to me to seefor me to give you all of the paging rights, okay. Go back to your Kul Josun page and just let me tell you also, Kul Josun page and just let me tell you also, Kul Josun page and just let me tell you also, Kul Josun page and just let me tell you also, Kul Josun page and just let me tell you also, Kul Josun page and just let me tell you also, Kul Josun page and just let me tell you also,			1	A. Oh, yes.
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	iasi Fiji.	A. In the middle of nowhere, pa		
11before ICF, and I met Rajit was at a Holiday Inn11144.Q.Okay.12in Oshawa on Harmony Road/401. And it was for12A.So, I kind of laughed at it, I		Δ So I kind of laughed at it I		in Ochawa on Harmony Road/401 And it was for
another company called Treasure Traders.	had set that	chuckled about it, but even though he h		
13another company called Treasure Traders.13chuckled about it, but even though he had set that14133.Q.Okay.14up, someone else had told me that he was living in15A.Do you remember that one?15Portugal. And then about a year ago, my daughter	was living in	up, someone else had told me that he v		
	my daughter	Portugal. And then about a year ago, m	15	
16 134. Q. I don't know that one, but are we 16 saw him at the shopping centre in Oshawa. So, she	nawa. So, she	saw him at the shopping centre in Osha	116	134. Q. I don't know that one, but are we
17 talking 1990s? 17 said hi to him, and that was it. She came home and	me home and	said hi to him, and that was it. She cam		talking 1990s?
18 A. Yes.	nnaction		118	
19135.Q.So, you knew the guy for a long19145.Q.Okay, but is there any connection20time?20that you are aware of or that you have heard about	Inection	145. Q. UKay, DULIS INFRE ANY CON		
20 time? 21 A. Yes. 21 A. Yes. 21 between KulClub and Banners?	nearu about	hatwaan KulClub and Rannars?	20	
21A. Yes.22136.Q. Let'sduring the Banners Broker22A. Well, the connection to me,			22	
20time?21A. Yes.22136.Q. Let'sduring the Banners Broker23period, did his lifestyle change at all? And I want20that you are aware of or that you have heard about21A. Yes.22136.23period, did his lifestyle change at all? And I want	1			
24 to talk about the same sorts of questions that we 24 somethingI mean, where do you get the money?		personally. I think the connection is he c	123	period did his litestivie change at all 2 And I Want
25 were talking about a few minutes ago, when we were 25 It's not cheap to start a network marketing company.	did	personally, I think the connection is he c somethingI mean, where do you get th	23 24 25	period, did his lifestyle change at all? And I want to talk about the same sorts of questions that we

			• 64
1 2 3 4 5 6 7 8 9 10	L. Guarini - 38 You have to have money to get started. And so I don't know where he got this kind of money to start this corporation. I can't prove, like I said, but I know that I know. 146. Q. You read this. Did he ever tell you anything about KulClub? A. No, oh, no. Because he was already split, separated. 147. Q. Got it, okay. So, we will go back to Dixit now.	1 2 3 4 5 6 7 8 9 10	L. Guarini - 40 wife? A. Jennifer. 152. Q. All right. A. Then the expenditures started coming in where all of a sudden he's coming in in Armani suits. I could tell you all kinds of things, okay, Armani suits. \$35,000 bottle of cognac. And I am not exaggerating. Limousines. A private jet for him and his wife and his mother to fly to, I think it was Bahamas. And it was right before New Year's.
11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	 A. Yes. 148. Q. And obviously you know a lot more about Dixit. So, what can you tell us about Raj? A. Well, from the beginning, seemed to be cool means like everything was normal. I couldn't afford to go out to dinners and all this other stuff. I mean, I was making 200 bucks a week. And I'm retired from Chrysler. So, I'm not living this high lifestyle. But I started seeing that they would always go out to dinner, you know, Kul, Raj and Chris. Always going out to dinner, always, constantly. Downtown. Little by little, as the company started to grow, I started seeing little expenditures and then 	11 12 13 14 15 16 17 18 19 20 21 22 23 24	Rings. Vehicles. A house, not rented. Big chunk of change on a house. And when I asked him, "How much are you getting paid? Like, how much are you getting paid from this company?" He says, "Oh, you know what, man, I work my ass off. If not for me this company would go kaput", right? And I said, "Well, no offence, but I seem to be doing a lot of work here and I'm not getting compensated. So, what gives? What goes on? Like, I'm working for peanuts." And I got a raise, I don't remember how much, but I will figure it out. I am just trying to think because the monies that was spent was concerning to me. As it got bigger and bigger and all of a
25	Kaj's thing is always, "I need a car." He needed a Page 39 L. Guarini - 39	25	sudden I saw this private jet and Page 41L. Guarini - 41
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	vehicle. So, at the time he got a used Chrysler 300, at the time. This is at the beginning. I can't remember what other vehicle he had at the time, but this was the beginning of the whole shebang. So, he started with a Chrysler 300. I don't know how much he was making, okay, but there was a slight swagger, you know, like, he was spending. As the company was growing and as he all of a sudden became the new Kul, well, I started noticing, all of a sudden he's got diamond rings, he's got jewellery for his wife. I don't know how muchmy wife even knows more than that, because he had talked to Dixit's wife. So, I don't know how much he had spent, and then	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 153. Q. You saw the jet? A. Oh, yes. 154. Q. Just tell me about that. I mean, we will cover the rest of it too, but how did you end up seeing the private jet? A. Well, I knew that he had taken a private jet, because he was asking me if my daughter would go with them so she could babysit the kids. And we said, "No." So, he said, "She'll be on the private jet with us. It's just us." And my wife wasI know she was utterly disgusted. But you know what, he's the bigwig with Chris, so be it. But the expenditures, his lifestyle, was not the lifestyle of the Rajiv Dixit that I was used to knowing.
16 17 18 19 20 21 22 23 24 25	 149. Q. When you say "his wife", do you mean Gloria or Stephanie? His first wife or A. No, Gloria was his mother. Jennifer. 150. Q. Jennifer. A. He started buying big names in clothes. You know, likeI'll just say Christian Dior, as an example. You know, he was buying her all of these things and purses. 151. Q. But which wife was it, his first 	16 17 18 19 20 21 22 23 24 25	155. Q. Okay. A. And I knew when he was telling everybody in Toronto, in the office in Toronto, what to do, when to do, how to do, "You better jump and I'll tell you know high," type of thing, it's the way it was. Nobody liked him. They didn't like him so bad they wanted him out of there. Just send him somewhere else. And this is the employees that were at Banners Broker. And I understood. I understood why. I

	Sheet 12 Page 42		Page 44
	L. Guarini - 42		L. Guarini - 44
1	mean, I got along with everybody. So, his	1	158. Q. Right.
2	expenditures near the end got really crazy. And	2	A. I went to his house. The guy had a
3	that was one of the reasons whywhen I went back	3	television in the toilet, for crying out loud. I
4	to Chris and said, "What in the hell is going on?	4	mean, how ridiculous is this going? You see. Now,
5	Like, I'm getting concerned here."	5	when he bought this house also saw a theatre
6	The reason why I was getting concerned is	6	room in the basement. When he bought the house,
7	because, I'm going to, let's just say, U.K., and	7	there was no theatre room.
8	somebody is saying, "Lorenzo, listen. With my	8	159. Q. Right.
9	account, I put in for withdrawal, but it's been	9	A. He spent multi-thousands of dollars
		10	
10	eight days or nine days or three weeks." Or, "I put		of refurbishing that basement. And then spent more
11	in a support ticket and I didn't get an answer."		multi-thousands of dollars refurbishing it again.
12	And so, I would say, "Okay, no problem." I would	12	It was ludicrous. It was just nothing but sheer
13	take down their name, their ID number and what was	13	waste. That's only a pittance of what I'm telling
14	the issue, and take it down, and then I would take	14	you.
15	it back to the office. And then I went to Stellar	15	160. Q. Why did he do it a second time, the
16	Point and went to the actual people that were doing	16	basement?
17	support and say, "This person here, why haven't they	117	A. Because he wanted to now get rid of
18	got an answer on their support ticket?" And then I	18	this one room and make some back room and open up
19	took it to Chris, and said, "Why haven't these	19	the room even more than what it was. So, he made
	took it to offits, and said, with thaven these	20	
20	people got paid?" "Oh, Zo, you know" And the	20	his theatre room. Like, literally a theatre and a
21	excuses that I would hear. I don't want to hear	21	lot of money. I can't give you the figures, but I
22	that, because I am the one that has got to speak to	22	know that it was a lot of money.
23	you and speak to everybody and say, "Okay, let's	23	And so this is an example of a lot of the
24 25	deal with your issues and let me help you."	24	sheer waste where he had brought in a pool table and
25	And my joband there is not a person in	25	then got rid of it and opened up the room even more.
	Page 43		Page 45
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	L. Guarini - 43		L. Guarini - 45
1	L. Guarini - 43		L. Guarini - 45
1	L. Guarini - 43 the world that will tell youmy job was to protect	1	L. Guarini - 45 And they had to go and retrofit again. Furniture,
1 2	L. Guarini - 43 the world that will tell youmy job was to protect those people, period. And when I started seeing	1	L. Guarini - 45 And they had to go and retrofit again. Furniture, all furnished. From what I heard, I can't prove
1 2 3	L. Guarini - 43 the world that will tell youmy job was to protect those people, period. And when I started seeing these expenditures	1 2 3	L. Guarini - 45 And they had to go and retrofit again. Furniture, all furnished. From what I heard, I can't prove that, okay, but a \$60,000 rock for new Mrs. Dixit.
1 2 3 4	L. Guarini - 43 the world that will tell youmy job was to protect those people, period. And when I started seeing these expenditures 156. Q. I mean, towards the end, you said	1 2 3 4	L. Guarini - 45 And they had to go and retrofit again. Furniture, all furnished. From what I heard, I can't prove that, okay, but a \$60,000 rock for new Mrs. Dixit. I can't prove that.
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2 A. I krow that he had at least 10, 12, maybe more watches. 2 could doi: but Oshawa Jewelies in the Oshawa Centre, they could give you an idea of how much morey was spent. And we are talking a lot of money. 3 a lot of them, but, Boles toIf thy the to bink of the name, they are all big, hooty-tooty whatever. a 4 167. O. Did the show them to you? a 5 A. I did thes. Life, Noty tooty whatever. I do f money. 8 10 Move, mind you, some of the monies that were spent in there were for rings wither 0 bink wearing them, or you saw them because he was 10 A. He would war them different times, time just as good as \$10.000 one or \$50.000 one. 11 A. He would war them different times, time just as good as \$10.000 one or \$50.000 one. 12 regardless, he had a lot of watches. And he had to watches on that it keeps them rolling or whatever. This is where you know, this someI don't know, this gadget, thingamabob that they put the watches on so that it keeps them rolling or whatever. This is where you know, that some kind of king, okay. And I probably would too zit level that? 10 D. Right. A. This is where you know, the some kind of king, okay. And I probably would too zit level that? 11 - A. BRIEF RECESS L. Guarini - 47 12 - A. BRIEF RECESS 13 L. Guarini - 47 14 - A. So, l	1	L. Guarini - 46	1	L. Guarini - 48
4 167. 0. Did he show them to you? 5 A. I clich's seal of them, but I saw a lot of them., Like, Roles toTm trying to think Now, mind you, some of the monies that were 7 of the name, they are all big, hooty-tody whatever. Now, mind you, some of the monies that were 9 168. O. And you saw them because he was Now, mind you, some of the monies that were 9 168. O. And you saw them at his house? Now, mind you, some of the monies that were 11 A. He would wear then different times, time just as good as 310,000 one or \$50,000 one. 160 13 time just as good as 310,000 one or \$50,000 one. 176. O. Right. 14 A. So, yes, some of the expenditures 160 A. So, yes, some of the expenditures 15 samt hat I. knew. 177. O. Right. A. I know, because I was there with him 160 O. Right. A. This is where the life really, 177. O. How do you wonk that? Or why do you 170 M. WARD: Ckay, so why don't we take a break. 177. O. How do you and of money. 24 break. 170. M. WARD: Ckay, so why don't we take a adroy of the same eval by wout alking hinm as if he was	2	A. I know that he had at least 10, 12,	2	could do it, but Oshawa Jewellers in the Oshawa
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8 I don't know 9 168. C. And you saw them because he was the wasing them, or you saw them at his house? 11 A. He would was them different times, it tells 9 earners, okay, would get, at how while were if they were 12 Ike, "Is that a new watch?" I like mine, it tells 11 mino 176. C. Right. 14 So, regardless, he had a lot of watches. And he had some I don't know, this gadget, thingamabob that the they out the watches on so that it keeps them to fulling or whatever. This is where you know, this is n't the up the watches on so that it keeps them to full ou eraspect, this is n't the peasant that I knew. 177. Q. How do you wo know that? Or why do you beleve that? 19 peasant that I knew. 177. Q. How do you wo know that? Or why do you beleve that? 109 A. This is where the life really, 177. Q. How do you wo know that? Or why do you beleve that? 110 M. MARD: Okay, so why don't we take a break. 177. Q. How do you whow that? Or why do you beleve that? 12 A. This is where the life really, 177. Q. How do you whow that? Or why do you beleve that? 12 The as that do than thewas the enal boup was here with him as if he was some kind				
10 wearing them, or you saw them at his house? 10 Portugal or Ireland or Whatever, if they were 11 A. He would wear them different times, it tells ing. ing. 13 time just as good as a \$10,000 one or \$50,000 one. 13 176. Q. Right. 14 So, regardless, he had al tof watches. And he had 16 here for that, but I can tell you a lot of monies 16 they put the watches on so that it keeps them 176. A. So, yeardless. 177. 178. a. This is where you know, this is and the respect, this isn't the 18 177. A. How do you know that? Or why do you 19 peasant that I knew. 17 A. This is where the life really, 17 A. How do you know that? Or why do you 19 peasant that I knew. 18 177. A. How we poul know that? He was 18 20 A. This is where the life really, 19 Peage 47 20 A. Ik now, because I was there with him 21	8			And it waswhat theI think million-dollar
11 A. He would wear them different times, like, "Is that a new watch?" Hike mine, it tells 12 time just as goods as \$10,000 one or \$50,000 one. 14 So, regardless, he had a lot of watches. And he had someI don't know, this gadget, thingamabob that they put the watches on so that it keeps them they put the watches on so that it keeps them they peasant that I knew. 11 million-dollar earners, they would give them a BB ring. 16 they nut the watches on so that it keeps them that the spent, other than those rings, were at isn'tand with all due respect, this isn't the peasant that I knew. 13 176. Q. Right. 19 peasant that I knew. 16 177. Q. How do you know that? Or why do you believe that? 20 A. This is where he life really, really started getting ridiculous. 177. Q. How do you know that? Or why do you believe that? 21 TO. MR. WARD: Ckay, so why don't we take a break. 22 In onnee, the was poking up the BB rings. But I know that he had bought other things there, because Hey were taiking to him as if he was some kind of king, okay. And I probably would too if I owneed the business and you are spending a ton 170. MR. WARD: L. Guarini - 47 Of money the way he was. 2 1 LORENZO GUARINI, resumed Not only that, because I know that he would buy watches at airports. So, he would bring	9			earners, okay, would getat those things like
13 time just as good as a \$10,000 one or \$50,000 one. 113 176. Q. Right. 14 So, regardless, he had a lot of watches. And he had 14 A. So, yes, some of the expenditures 15 some Joon't know, this adject, thing anabob that 14 A. So, yes, some of the expenditures 16 they put the watches on so that it keeps them 17 O. How do you know that? Or why do you 17 peasant that I knew. 161 O. Right. 177. Q. How do you know that? Or why do you 161 D. Right. 177. Q. How do you know that? Or why do you 177. 162 O. Right. 177. Q. How do you know that? Or why do you 163 170. MR. WARD: Okay, so why don't we take a 20 17 really starde detting indiculous. 23 there, because they were talking to him as if he was 25 L. Guarini - 47 L. Guarini - 47 L. Guarini - 47 L. Guarini - 47 1 A BRIEF RECESS 16 not only that, because I know that he would 3 2 LORENZO GUARINI, resumed Not only that, because I know that he would from throm ort, at customs or whatever the cases may be theral, we does off on that and that you have	11	A. He would wear them different times,	11	million-dollar earners, they would give them a BB
14 So, régardlešs, he had a lot of watches. And he had some. I. don't know, this gadget, thing gamabob that they put the watches on so that it keeps them rolling or whatever. This is where you know, this isn'tand with all due respect, this isn't the peasant that 1 knew. 14 A. So, yes, some of the expenditures were for that, but 1 can tell you a lot of monies 16 they put the watches on so that it keeps them rolling or whatever. This is where you know, this isn'tand with all due respect, this isn't the peasant that 1 knew. 15 were for that, but 1 can tell you a lot of monies 17 O. Right. 18 177. Q. How do you know that? Or why do you 21 A. This is where the life really, really started getting ridiculous. 178. A. I know, because I was there with him once. Now, that's when he was picking up the BB rings. But I know that he had bought other things started getting ridiculous. 23 170. MR. WARD: Okay, so why don't we take a break. 23 there, because they were talking to him as if he was some kind of king, okay. And I probably would too 25 L. Guarini - 47 L. Guarini - 47 L. Guarini - 47 1 We ADRIEF RECESS 1 of money the way he was. 2 Not only that, because I know that he would buy watches at at prots. So, he would bring them home and, I don't know is had lots of watches, expensive watches. He had some watch craziness, whatever. 172. Q.	12	like, "Is that a new watch?" I like mine, it tells		
15 someI don't know, this gadget, thingamabob that 16 they put the watches on so that it keeps them 17 rolling or whatever. This is where you know, this 18 isn'tand with all due respect, this isn't the 19 peasant that I knew. 20 169. Q. Right. 21 A. This is where the life really, 22 really started getting ridiculous. 23 170. MR. WARD: 24 break. 25 L. Guarini - 47 1 A BRIEF RECESS 2 L. Guarini - 47 1 A BRIEF RECESS 2 115 2 CONTINUED EXAMINATION BY MR. WARD: 5 171. Q. So, just before the break, we were 6 talking about Rajiv Dixit. 7 A. Mhrmm. 173. Q. So, I just want to make sure that 14 weo toges off on that and that you can think of in that regard, right? 174. Q. One of the last examples was, right? 174. Q. One of the last examples was, right? 174. Q. One of the last examples was, right?	14	So, regardless, he had a lot of watches. And he had		J
17 rolling or whatever. This is where you know, this isn'tand with all due respect, this isn't the peasant that I knew. 17 Oshawa Jewellers. 18 isn'tand with all due respect, this isn't the peasant that I knew. 177. O. How do you know that? Or why do you believe that? 20 169. O. Right. 177. O. How do you know that? Or why do you believe that? 21 A. This is where the life really, really started getting ridiculous. 20 A. I know, because I was there with him once. Now, that's when he was picking up the BB rings. But I know that he had bought other things 23 170. MR. WARD: Okay, so why don't we take a break. 21 A. I know, that is when he was picking up the BB rings. But I know that he had bought other things 23 170. MR. WARD: Okay, so why don't we take a break. 22 there, because they were talking to him as if he was break autor to okay. And I probably would too 25 L. Guarini - 47 L. Guarini - 47 L. Guarini - 47 1 A BRIEF RECESS 1 of money the way he was. 2 2 LORENZO GUARINI, resumed 3 buy watches at airports. So, he would bring them or not, at customs or whatever the case may be, that, I don't to know. Wat he claimed them or not, at customs or whatever the case may be, that, I don't to know. Brea alots of watches, expensive watches. 178.	15	someI don't know, this gadget, thingamabob that	15	were for that, but I can tell you a lot of monies
18 isn'tand with all due respect, this isn't the 19 peasanit that I knew. 20 169. Q. Right. 21 A. This is where the life really, 22 really started getting ridiculous. 23 170. MR. WARD: 24 break. 25 break. 26 really started getting ridiculous. 26 really started getting ridiculous. 27 MR. WARD: Okay, so why don't we take a 28 break. 29 there, because they were talking to him as if he was 20 n A BRIEF RECESS 2 L. Guarini - 47 1 A BRIEF RECESS 2 Not only that, because I know that he would 3 LORENZO GUARINI, resumed 4 CONTINUED EXAMINATION BY MR, WARD: 5 171. O. 6 taking about Rajiv Dixit. 7 A. 8 172. 9 were giving us your observations on his lifestyle 10 and things were getting a little out of control 11	10	rolling or whatever. This is where you know, this		Oshawa Jewellers.
24 break. 24 some kind of king, okay. And I probably would too if I owned the business and you are spending a ton 25 L. Guarini - 47 I	18	isn'tand with all due respect, this isn't the	18	177. Q. How do you know that? Or why do you
24 break. 24 some kind of king, okay. And I probably would too if I owned the business and you are spending a ton 25 L. Guarini - 47 I	20			
24 break. 24 some kind of king, okay. And I probably would too if I owned the business and you are spending a ton 25 L. Guarini - 47 I	21	A. This is where the life really,	21	once. Now, that's when he was picking up the BB
24 break. 24 some kind of king, okay. And I probably would too if I owned the business and you are spending a ton 25 L. Guarini - 47 I	22	really started getting ridiculous.	22	rings. But I know that he had bought other things there because they were talking to him as if he was
Page 47 L. Guarini - 47 1 A BRIEF RECESS 2 L. Guarini - 47 1 A BRIEF RECESS 2 Solution of money the way he was. 3 LORENZO GUARINI, resumed 4 CONTINUED EXAMINATION BY MR, WARD: 5 171. Q. So, just before the break, we were 6 talking about Rajiv Dixit. 7 A. M'hmm. 8 172. Q. And it was towards the end and you 9 were giving us your observations on his lifestyle and things were getting a little out of control 11 towards the end in terms of the spending. 173. Q. So, just want to make sure that 14 we close off on that and that you have told us A. Yes. 15 everything that you can think of in that regard, 176. 16 right? A. Yes. 17 A. Yes. 18 174. 18 174. Q. One of the last examples was, 19 perhaps, themaybe a \$50,000 ring. And Kelly,	24	break.	24	some kind of king, okay. And I probably would too
L. Guarini - 47 1 A BRIEF RECESS 2 3 LORENZO GUARINI, resumed 4 CONTINUED EXAMINATION BY MR. WARD: 5 171. Q. So, just before the break, we were 6 talking about Rajiv Dixit. 7 A. M'hmm. 8 172. Q. And it was towards the end and you 9 were giving us your observations on his lifestyle 10 and things were getting a little out of control 11 towards the end in terms of the spending. 12 A. Yes. 13 173. Q. So, I just want to make sure that 14 we close off on that and that you have told us 15 everything that you can think of in that regard, 17 A. Yes. 18 174. Q. One of the last examples was, 19 perhaps, themaybe a \$50,000 ring. And Kelly, 10 L. Guarini - 49 1 of money the way he was. 2 Not only that, because I know that he would 3 buy watches at airports. So, he would bring them 4 home and, I don't know if he claimed them or not, at 5 customs or whatever the case may be, that, I don't 6 know. But I know he had lots of watches, expensive 7 watches. He had some watch craziness, whatever. 8 178. Q. So, just in the same vein, we talked 9 about Harry Rosen before the break 10 A. M'hmm. 11 179. QOshawa Jewellers. Any other 12 A. Yes. 13 174. Q. One of the last examples was, 14 174. Q. One of the last examples was, 15 perhaps, themaybe a \$50,000 ring. And Kelly, 16 trying to think of the name of the street. Just use	L	D		
2Not only that, because I know that he would3LORENZO GUARINI, resumed4CONTINUED EXAMINATION BY MR. WARD:5171.Q. So, just before the break, we were6talking about Rajiv Dixit.7A. M'hmm.8172.Q. And it was towards the end and you9were giving us your observations on his lifestyle10and things were getting a little out of control11towards the end in terms of the spending.12A. Yes.13173.Q. So, I just want to make sure that14we close off on that and that you have told us15everything that you can think of in that regard,16right?17A. Yes.18174.19perhaps, themaybe a \$50,000 ring. And Kelly,				
3LORENZO GUARINI, resumed4CONTINUED EXAMINATION BY MR, WARD:5171.0.So, just before the break, we were6talking about Rajiv Dixit.7A.7A.8172.9were giving us your observations on his lifestyle10and things were getting a little out of control11towards the end in terms of the spending.12A.13173.14we close off on that and that you have told us15everything that you can think of in that regard,16right?17A.18174.19perhaps, themaybe a \$50,000 ring. And Kelly,		A BRIEF RECESS	1	of money the way he was.
5171.Q.So, just before the break, we were talking about Rajiv Dixit.5customs or whatever the case may be, that, I don't know. But I know he had lots of watches, expensive watches. He had some watch craziness, whatever.7A.M'hmm.6know. But I know he had lots of watches, expensive watches. He had some watch craziness, whatever.8172.Q.And it was towards the end and you were giving us your observations on his lifestyle and things were getting a little out of control and things were getting a little out of control110and things were getting a little out of control and things were getting a little out of control111towards the end in terms of the spending.112A.Yes.13173.Q.14we close off on that and that you have told us to right?115everything that you can think of in that regard, right?181.16right?181.Q.17A.Yes.18174.Q.19perhaps, themaybe a \$50,000 ring. And Kelly,1819perhaps, themaybe a \$50,000 ring. And Kelly,19	3	LORENZO GUARINI, resumed	$\frac{2}{3}$	buy watches at airports. So, he would bring them
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7A. M'hmm.8172.Q. And it was towards the end and you9were giving us your observations on his lifestyle10and things were getting a little out of control11towards the end in terms of the spending.12A. Yes.13173.14we close off on that and that you have told us15everything that you can think of in that regard,16right?17A. Yes.18174.19perhaps, themaybe a \$50,000 ring. And Kelly,		talking about Raiiv Dixit.		
 9 were giving us your observations on his lifestyle 10 and things were getting a little out of control 11 towards the end in terms of the spending. 12 A. Yes. 13 173. Q. So, I just want to make sure that 14 we close off on that and that you have told us 15 everything that you can think of in that regard, 16 right? 174. Q. One of the last examples was, 19 perhaps, themaybe a \$50,000 ring. And Kelly, 9 about Harry Rosen before the break 10 A. M'hmm. 179. QOshawa Jewellers. Any other 181. Q. Okay. And was there an Audi 181. Q. Okay. And was there an Audi 17 A. Yes. 18 174. Q. One of the last examples was, 19 perhaps, themaybe a \$50,000 ring. And Kelly, 		A. M'hmm.	7	watches. He had some watch craziness, whatever.
10and things were getting a little out of control11towards the end in terms of the spending.12A. Yes.13173.Q. So, I just want to make sure that14we close off on that and that you have told us15everything that you can think of in that regard,16right?17A. Yes.18174.19perhaps, themaybe a \$50,000 ring. And Kelly,	8	were giving us your observations on his lifestyle		about Harry Rosen before the break
12A. Yes.13173.Q. So, I just want to make sure that14we close off on that and that you have told us15everything that you can think of in that regard,16right?17A. Yes.18174.19perhaps, themaybe a \$50,000 ring. And Kelly,	10	and things were getting a little out of control	10	A. M'hmm.
14we close off on that and that you have told us14180.Q. And which dealer?15everything that you can think of in that regard,15A. That'sThickson Road, Whitby.16right?16181.Q. Okay. And was there an Audi17A. Yes.16181.Q. Okay. And was there an Audi18174.Q. One of the last examples was,18A. Yes, there wasthat's onI'm19perhaps, themaybe a \$50,000 ring. And Kelly,19trying to think of the name of the street. Just use	111			stores that come to mind?
15everything that you can think of in that regard,15A. That'sThickson Road, Whitby.16right?16181.Q. Okay. And was there an Audi17A. Yes.16181.Q. Okay. And was there an Audi18174.Q. One of the last examples was,18A. Yes, there wasthat's onI'm19perhaps, themaybe a \$50,000 ring. And Kelly,19trying to think of the name of the street. Just use	13	173. Q. So, I just want to make sure that	13	A. Mercedes.
16right?16181.Q.Okay. And was there an Audi17A.Yes.17dealership that he dealt with?18174.Q.One of the last examples was,18A.Yes, there wasthat's onI'm19perhaps, themaybe a \$50,000 ring. And Kelly,19trying to think of the name of the street. Just use	14	we close off on that and that you have told us everything that you can think of in that regard		
18 174. Q. One of the last examples was, 18 A. Yes, there wasthat's onI'm 19 perhaps, themaybe a \$50,000 ring. And Kelly, 19 trying to think of the name of the street. Just use	16	right?	16	181. Q. Okay. And was there an Audi
19 perhaps, themaybe a \$50,000 ring. And Kelly, [19 trying to think of the name of the street. Just use	17			
120 perhaps, can tell us about that. II20 Baseline.	19	perhaps, themaybe a \$50,000 ring. And Kelly,	19	trying to think of the name of the street. Just use
	20	perhaps, can tell us about that.	20	
21A. Yes, like I said, for me it's21182.Q. In Whitby?22hearsay.22A. In Whitby.	22	hearsay.	22	A. In Whitby.
23 175. Q. Yes. [23 183. Q. All right. And what else? Any	23	175. Q. Yes.	23	
24 A. But I don't doubt it. I don't doubt I 24 other stores, dealers? 25 it, because he spentyou know, I can tell you guys I 25 A. I am just trying to think. I mean,	25		25	

	Sheet 14 Page 50	r	Page 52
	L. Guarini - 50		L. Guarini - 52
1	those are the	1	194. Q. That would be great. Thanks for
2	184. Q. Okay.	2	that.
23	A. I'm justthose are the main ones.	3	A. So, yes, like I said, I'm here to
	185. Q. Fair enough. Restaurants, is	4	help you guys in any way that I can. Because I
45	there was there a forourite? Harbour Sixtu?	5	want this PB thing has been a nightmare for me in
	therewas there a favourite? Harbour Sixty?		wantthis BB thing has been a nightmare for me in
6	A. No.	6	my life, although it was a blessing in one way,
7	186. Q. Okay.	7	because I have met such beautiful people around the
8	A. Yes, that	8	world. But it's been a nightmare for me and my
9	187. Q. And just while we are on the point,	9	family and our finances and our life.
10	the same for Josun. Do you know whether or not	10	195. Q. Okay. And we can talk a bit more
11	there was one restauranť, in particular, that he	11	about that. I am also going to come back to the
12	spent a lot of time at, or one store or dealership,	12	Cyprus bank account later.
13	in particular, that he might have shopped at?	13	A. Yes.
14	A. No. I don't know.	14	196. Q. But I want tojust staying on
14		15	Divit
15	188. Q. Right, and Chris has just passed me		Dixit.
16	a note. In terms of the privatethe jet, any idea	16	A. Yes.
17	how that might have been arranged? Who rented it to	117	197. Q. Apart from Cyprus, did you know or
18	him?	18	had you heard rumours that he had assets anywhere
19	A. No. You know, there was a lot of	19	else outside of Canada?
20	things that I am just not privy to. You know, I	20	A. No, and I would be surprised
21	wasn't privy to bank accounts or how much money the	21	because, I mean, from what I thought, I would have
22	company had or how much money the company made. I	22	thought he would have told me. Because he surely
20 21 22 23	wasn't privy to any of this stuff.	22 23	liked to let you know of his comeuppance in life,
24	189. Q. And, in fact, that's what I wanted	24	you know?
24 25	to get to next. And we are just talking about Dixit	25	198. Q. Okay, so the "comeuppance in life",
20	to get to hext. And we are just taiking about Dixit	20	
	Page 51		Page 53
	L. Guarini - 51		Page 53 L. Guarini - 53
1	L. Guarini - 51 and presumably, like Josun, he bragged from time to	1	L. Guarini - 53 because I think this is an interesting area, just
1 2	L. Guarini - 51 and presumably, like Josun, he bragged from time to time?	1	L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s.
1 2 3	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes.	1 2 3	L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm.
1 2 3 4	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes. 190. Q. Any bragging about investments,	1 2 3 4	L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm. 199. Q. And justI want you to describe
1 2 3	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes. 190. Q. Any bragging about investments,	1 2 3	L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm.
1 2 3 4 5	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes. 190. Q. Any bragging about investments, stocks, bonds, bank accounts, offshore, in other	1 2 3 4 5 6	L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm. 199. Q. And justI want you to describe for me one more time, because we have touched on it
1 2 3 4	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes. 190. Q. Any bragging about investments,	1 2 3 4	L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm. 199. Q. And justI want you to describe for me one more time, because we have touched on it a little bit, how his life changed before Banners
1 2 3 4 5 6 7	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes. 190. Q. Any bragging about investments, stocks, bonds, bank accounts, offshore, in other people's names? A. Not that I can recall, if I can	1 2 3 4 5 6 7	 L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm. 199. Q. And justI want you to describe for me one more time, because we have touched on it a little bit, how his life changed before Banners and after Banners, okay. And so let's start with
1 2 3 4 5 6 7 8	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes. 190. Q. Any bragging about investments, stocks, bonds, bank accounts, offshore, in other people's names? A. Not that I can recall, if I can 191. Q. Do you know if he had any banking	1 2 3 4 5 6 7 8	 L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm. 199. Q. And justI want you to describe for me one more time, because we have touched on it a little bit, how his life changed before Banners and after Banners, okay. And so let's start with perhaps his house. Where was he living before he
1 2 3 4 5 6 7 8 9	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes. 190. Q. Any bragging about investments, stocks, bonds, bank accounts, offshore, in other people's names? A. Not that I can recall, if I can 191. Q. Do you know if he had any banking relationships outside of Canada?	1 2 3 4 5 6 7 8 9	 L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm. 199. Q. And justI want you to describe for me one more time, because we have touched on it a little bit, how his life changed before Banners and after Banners, okay. And so let's start with perhaps his house. Where was he living before he bought this house that you described for us on
1 2 3 4 5 6 7 8 9 10	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes. 190. Q. Any bragging about investments, stocks, bonds, bank accounts, offshore, in other people's names? A. Not that I can recall, if I can 191. Q. Do you know if he had any banking relationships outside of Canada? A. Yes. Cyprus.	1 2 3 4 5 6 7 8 9 10	 L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm. 199. Q. And justI want you to describe for me one more time, because we have touched on it a little bit, how his life changed before Banners and after Banners, okay. And so let's start with perhaps his house. Where was he living before he bought this house that you described for us on Coyston?
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	L. Guarini - 51 and presumably, like Josun, he bragged from time to time? A. Oh, yes. 190. Q. Any bragging about investments, stocks, bonds, bank accounts, offshore, in other people's names? A. Not that I can recall, if I can 191. Q. Do you know if he had any banking relationships outside of Canada? A. Yes. Cyprus. 192. Q. Okay. A. In Cyprus. There was an account in Cyprus and we had a joint account there. That's where I wanted to put my savings, because, apparently, they pay good interest as opposed to here. So, now, I just got to think of the name. And you know what? When we would log into our accounts, you had to have this littlesee, I don't know, it's a security thing, where you got to punch in your numbers in order for you to be able to log into your account. So, if I still have that, okay, I might be able to get into that account and then I	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 10 11 23 14 11 23 14 11 23 14 11 23 14 15 10 11 22 12 21 12 21 12 21 22 11 22 12 21 12 21 22 11 22 12 21 22 21 22 21 22 21 22 21 22 21 22 21 2	 L. Guarini - 53 because I think this is an interesting area, just because you have known Raj since the late 1990s. A. M'hmm. 199. Q. And justI want you to describe for me one more time, because we have touched on it a little bit, how his life changed before Banners and after Banners, okay. And so let's start with perhaps his house. Where was he living before he bought this house that you described for us on Coyston? A. Before Coyston, he was living innear the college. Near NorvilleNorland. He was living on this Norland. He was renting that place. 200. Q. And it may be 1019 Norland? Did you ever go there? A. Oh, yes. 201. Q. Okay, and what was it like? A. I don't knowa 100 percent sure of the number. 202. Q. Right. A. But, yes, it was Norland Circle.

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	Sheet 15 Page 54		Page 56
	L. Guarini - 54		L. Guarini - 56
1	Circle rental property was like.	1	right? So, he kicked the door and the door ended up
2	A. Nice place. Big kitchennice,	$\parallel 2$	hitting the kid in the mouth.
3	like it wasn't old, okay. It was basically meant as	23	The kid, later on, goes down the road to
	an investment property. He had rented it from a	4	play with a friend at somebody else's house. He was
4	friend of his. This was meent to be an invoctment		and the auvie and believe me. Which he
5	friend of his. This was meant to be an investment	5 6 7	anal, this guy is anal, believe me. Which he
6	property.		forbade the kid to go and play at anybody's house.
	205. Q. Okay, for his friend?		Well, the kid who he went to play with, his mother
8	A. Yes.	8	was a teacher, so she called the police.
9	206. Q. And from thereto your knowledge,		214. Q. Yes.
10	did he move from Norland to Coyston Court, or was	10	A. Because she asked him what had
11	there anywhere in between?	11	happened and he said, "Rajiv kicked the door and hit
12	A. I am trying to think if there was	12	me in my mouth." So, he got arrested. He was asked
13	somewhere in between.	13	to go to the police station and talk to the police
14	207. Q. If you recall. If you don't recall,	14	about the incident, everything else. And they
15	that's fine too.	15	arrested him and then sent him to Lindsay. So, I
16	A. Yes, I don't recall.	16	felt bad for him because I didn't think Raj was the
17	208. Q. Okay, and what about these cars? At	17	kind to go and do that to a kid, you know, not on
18	the beginning of	18	purpose.
19	A. He had a van.	19	And so I put up my house and everything
20 21	209. Q. At the beginning of Banners Broker	20	else, to bail him out. And not only thatand it's
21	he had the Chrysler 300, right?	21	the last time that I will ever do something like
22	A. Yes, and I think he still had a van.	22	that, because I was in prison. He could not move,
23	210. Q. So, tell me about before Banners	23	he could not go anywhere without me by his side,
24	Broker. How did he get around?	24	meaning I had to be there, wherever he was. He
25	A. He had a van, before he bought the	25	could not go out in public without me there.
_	Page 55	<u> </u>	Page 57
Γ.	L. Guarini - 55		L. Guarini - 57
1	L. Guarini - 55 300, when he was living at Norland Circle. What was	1	L. Guarini - 57 So, it became a prison for me. And another
1 2	L. Guarini - 55 300, when he was living at Norland Circle. What was he doing at the time? It was a phone place. Public	1 2	L. Guarini - 57 So, it became a prison for me. And another guy named Glenroy was also a signatory, although he
3	L. Guarini - 55 300, when he was living at Norland Circle. What was he doing at the time? It was a phone place. Public Mobile, okay.	1 2 3	L. Guarini - 57 So, it became a prison for me. And another guy named Glenroy was also a signatory, although he didn't own anything or have anything to put up for
3	L. Guarini - 55 300, when he was living at Norland Circle. What was he doing at the time? It was a phone place. Public Mobile, okay. 211. Q. Okay.	4	L. Guarini - 57 So, it became a prison for me. And another guy named Glenroy was also a signatory, although he didn't own anything or have anything to put up for collateral. In the end, it went to a lawyer's and
1 2 3 4 5	L. Guarini - 55 300, when he was living at Norland Circle. What was he doing at the time? It was a phone place. Public Mobile, okay. 211. Q. Okay. A. And so, again, he had a friend of	1 2 3 4 5	L. Guarini - 57 So, it became a prison for me. And another guy named Glenroy was also a signatory, although he didn't own anything or have anything to put up for collateral. In the end, it went to a lawyer's and they made some type of peace bond or whatever, he
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Sheet 16Page 581we will get that to you, so that's great.2A. Yes.3221.Q. Rajiv Dixit, before Banners Broker,4the end of Banners Broker, tell me more about some5of the changes that you observed.6A. Well, from a guy that was living7week-to-month to a guy that was, all of a sudden,8spending money like it was water, like it was9nothing. And that'slike, a 1,000th percent10difference. Not 100, a 1,000. So, he went from,11let's say beingyou know, living from week-to-12week, okay, to living high off the hog.13Evenand that's another thing I will14bring up, too. You know, I had never seen anything15like this. And this is why I say to you earlier,16it's the thing that just really got to his head.17And now I started realizing that this guy has got a18sickness, okay. He is really sick up here. He19could switch on and off, like a dual personality.20And tell me that people were after him.21"Okay, you don't know, man, we need security."22"What are you talking about?" And I will give you23the perfect example. We were in the U.K., we were24in ManchesterBolton. And it was a big hoopla,25okay. And you know what, this wasfor me, it was	Page 60 L. Guarini - 60 1 And so I stuck with all the distributors or 2 what have you. I don't know whatwe will use the 3 term "distributors". So, I spent time with them. 4 And they said, "No, you gotta come right now." As 5 if I'm supposedly, you know, like a vice-president 6 of the United States. I don't even think the 7 president gets that much security. It was 8 ridiculous, right? And it wasn't once. 9 222. Q. Who was it that wanted that 10 security? 11 A. Rajiv Dixit. Chrislet me tell 12 you about Chris. When I met Chris, Chris was really 13 tight with a penny, very tight. Raj got him to 14 really loosen up the strings, to convince him that, 15 "You need security, you need this, you need that", 16 all the hoopla and everything else. I was 17 embarrassed. I was embarrassed. I don't need 18 security. There was nobody out to get me. I was 19 out there to do presentations, period. Why would 20 anybody be out to get me? And if you want to have 21
Page 59 L. Guarini - 59 1 great. I went upand when I spoke to people, I 2 spoke from here. I didn't memorize things or know 3 what I was going to say. I just spoke from my 4 heart. And I could feel it, because it emanated to 5 the people. 6 But then we would get to the big hoopla 7 after. This was the big presentation and my talk to 8 the people, okay. I had people crying, I had people 9 laughing, and it was fun. And after that's over, 10 everybody is coming to the front. Everybody wants 11 to touch me like I'm Tony Robbins, you know. And 12 it's a great feeling, because everybody was happy. 13 It was a great business. Everybody was getting 14 paid. Everybody was making money, so I'm happy. 15 But when we get to the event, okay. We 16 have got buses that are taking us there, limousines, 17 20, 30 security guards. What? "Lorenzo", he was 18 Irish. He's a good guy, he's a really good guy. 19 And like I said, if you are paying me a crap load of 20 money, I don't care what you want, I'll do whatever	Page 61 L. Guarini - 61 there was a lot. 2 224. Q. More than five? 3 A. Let's say 10, okay. I wonder if I 4 could find that out, too, maybe. 5 225. Q. So, the question that we have for 6 you on this side of the table is, do you remember 7 the name of anyone on the security detail or the 8 name of the security company or could you find that 9 out for us and let us know? 10 A. Yes, I will. I don't know what the 11 security company would be called, but, yes, I will 12 see if I can get a hold ofhe's in Ireland. 13 226. Q. Okay. 14 A. And, yes, I'll do that. So, make 15 sure you write down all these things and I will 16 chase it down. U/T 17 227. Q. We will. And just on the subject of 18 security, in Portugal, I take it, there was some 19 security as well? 20 A. Yes. These were the biggest guys I 21 have ever seen in my life. The one guy, a black 22 guy, hisyou and me, and I'm not exaggerating, he 23 is the biggest guy I have ever seen in my life. Not 24 the tallest. 25 228. Q. Right.

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1	Sheet 17 Page 62		Page 64
1	L. Guarini - 62		L. Guarini - 64
		1 1	terms of Rajiv Dixit's life before and after Banners
2	A. But the width of this guy, his lats, okay, you and me could stand side-by-side and nobody	2	Broker.
3	will see us other than our legs. And I am not	3	A. Well, I mean, you know, like I said
4	exaggerating in the least, he was the biggest man I		he was living on small means. And from, you know,
5	have ever seen in my life. Why we needed him? I	4	living, like I said, from week-to-week, week-to-
6	don't know. But I'm just there, I'm going with the	6	
7	flow.		month, sometimes he struggled to make payments just
8			even on his rent. I mean, I have helped this guy so
		8	much. So, from there
9	Portugal, to your knowledge? Was that	9	240. Q. Did you help him with his rent
10	A. It has got to be Dixit.	10	payments, is that
11	230. Q. And similar, can you see if you can		A. Oh, sometimes, sometimes. I just
12	find out any information about who the security	12	lend him money, yes.
13	company was in Portugal?	13	241. Q. Prior to Banners Broker?
14	A. I can try. That will be a hard one.	14	A. Sometimes. And then he would go and
15	The Ireland one, I can do it. Because he became the	15	do something, like, you know, get with his buddy
16	security, not just Ireland, but it was him that was	16	there and do the Public Mobile or whatever. And he
17	hired to do Irelandto do Ireland, England. I	17	would pay me back, one way or another. But then,
18	don't know, wherever else we had. It wasn't the	18	like I said, from living like that to, all of a
19	same people in Portugal as it was afterwards.	19	sudden, what I was telling you, with the watches,
20	Portugal was a one-time thing. But I can try to	20	with the rings, the jewellery, the purses, the
21	find out.	21	thousand-dollar diaper bag, apparently.
22	231. Q. Do you remember his name?	22	242. Q. Okay, whose diaper bag?
23	A. I will tell you in a second.	23	A. For his daughter, to a car for his
24	232. MR. WARD: Let's just take a break for a	24	sister. A car for his brother. I'm just trying to
25	second.	25	think. I mean, there is a lot, there's a lot.
	Page 63		Page 65
	L. Guarini - 63		L. Guarini - 65
1	DISCUSSION OFF THE RECORD	1	There was so much money spent and, near the end,
2		23	when we got into it and I said, like, "You
3	BY MR. WARD:	1 2	know and have safet it was all the and a wave additioned
			knowand i brought it up, all these expenditures.
4	233. Q. So, Lorenzo, the security person	4	knowand I brought it up, all these expenditures. The things that I said I'm seeing. And he said,
	233. Q. So, Lorenzo, the security person that you met in Ireland was?		The things that I said I'm seeing. And he said,
4 5 6	that you met in Ireland was? A. Conor.	45	The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an
45	that you met in Ireland was?	4	The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah, blah. And I said, "You know
4 5 6	that you met in Ireland was? A. Conor.	4 5 6 7	The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah, blah. And I said, "You know what, you and your stupid titles and everything
4 5 6 7	that you met in Ireland was? A. Conor. 234. Q. That's his first name? A. Yes.	45	The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah, blah. And I said, "You know what, you and your stupid titles and everything else. Okay, the way you are spending, even a guy
4 5 6 7 8	that you met in Ireland was? A. Conor. 234. Q. That's his first name? A. Yes.	4 5 6 7 8	The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah, blah. And I said, "You know what, you and your stupid titles and everything else. Okay, the way you are spending, even a guy making \$250,000 to \$500,000 a year wouldn't be able
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4 5 6 7 8 9 10	that you met in Ireland was? A. Conor. 234. Q. That's his first name? A. Yes. 235. Q. And do you have his last name or his contact information there? A. I am just looking right now. Brett,	4 5 6 7 8 9 10 11	The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah, blah. And I said, "You know what, you and your stupid titles and everything else. Okay, the way you are spending, even a guy making \$250,000 to \$500,000 a year wouldn't be able
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 that you met in Ireland was? A. Conor. 234. Q. That's his first name? A. Yes. 235. Q. And do you have his last name or his contact information there? A. I am just looking right now. Brett, B-R-E-T-T. Now, I don't know if I spelled his name wrong myself. I have got only one "N", but I might have spelled it wrong. 236. Q. Okay. A. So, it's Conor Brett. 237. Q. All right, anything else, sir, that could help us contact him? A. Okay, hang on a sec. That's the number I have for him. 	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah. And I said, "You know what, you and your stupid titles and everything else. Okay, the way you are spending, even a guy making \$250,000 to \$500,000 a year wouldn't be able to spend like this. So, I need to know what the hell's going on." And this is where we really got into it. 243. Q. Yes, there was a falling out at some point A. Oh, there was a major falling out. 244. Qwhich we are going to come to. But two cars for his brother? A. Yes. 245. Q. What was his brother's name? I was going to ask what was his brother's name and what
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 that you met in Ireland was? A. Conor. 234. Q. That's his first name? A. Yes. 235. Q. And do you have his last name or his contact information there? A. I am just looking right now. Brett, B-R-E-T-T. Now, I don't know if I spelled his name wrong myself. I have got only one "N", but I might have spelled it wrong. 236. Q. Okay. A. So, it's Conor Brett. 237. Q. All right, anything else, sir, that could help us contact him? A. Okay, hang on a sec. That's the number I have for him. 238. Q. Okay. I am just going to pass this 	4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 20 21	 The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah, blah. And I said, "You know what, you and your stupid titles and everything else. Okay, the way you are spending, even a guy making \$250,000 to \$500,000 a year wouldn't be able to spend like this. So, I need to know what the hell's going on." And this is where we really got into it. 243. Q. Yes, there was a falling out at some point A. Oh, there was a major falling out. 244. Qwhich we are going to come to. But two cars for his brother? A. Yes. 245. Q. What was his brother's name? I was going to ask what was his brother's name and what was the make of the car?
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 that you met in Ireland was? A. Conor. 234. Q. That's his first name? A. Yes. 235. Q. And do you have his last name or his contact information there? A. I am just looking right now. Brett, B-R-E-T-T. Now, I don't know if I spelled his name wrong myself. I have got only one "N", but I might have spelled it wrong. 236. Q. Okay. A. So, it's Conor Brett. 237. Q. All right, anything else, sir, that could help us contact him? A. Okay, hang on a sec. That's the number I have for him. 238. Q. Okay. I am just going to pass this to Erin to jot it down. 	4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22	 The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah. And I said, "You know what, you and your stupid titles and everything else. Okay, the way you are spending, even a guy making \$250,000 to \$500,000 a year wouldn't be able to spend like this. So, I need to know what the hell's going on." And this is where we really got into it. 243. Q. Yes, there was a falling out at some point A. Oh, there was a major falling out. 244. Qwhich we are going to come to. But two cars for his brother? A. Yes. 245. Q. What was his brother's name? I was going to ask what was his brother's name and what was the make of the car? A. I don't remember.
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 that you met in Ireland was? A. Conor. 234. Q. That's his first name? A. Yes. 235. Q. And do you have his last name or his contact information there? A. I am just looking right now. Brett, B-R-E-T-T. Now, I don't know if I spelled his name wrong myself. I have got only one "N", but I might have spelled it wrong. 236. Q. Okay. A. So, it's Conor Brett. 237. Q. All right, anything else, sir, that could help us contact him? A. Okay, hang on a sec. That's the number I have for him. 238. Q. Okay, I am just going to pass this to Erin to jot it down. A. Yes, no problem at all. 	4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22 23	 The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah, blah. And I said, "You know what, you and your stupid titles and everything else. Okay, the way you are spending, even a guy making \$250,000 to \$500,000 a year wouldn't be able to spend like this. So, I need to know what the hell's going on." And this is where we really got into it. 243. Q. Yes, there was a falling out at some point A. Oh, there was a major falling out. 244. Qwhich we are going to come to. But two cars for his brother? A. Yes. 245. Q. What was his brother's name? I was going to ask what was his brother's name and what was the make of the car? A. I don't remember. 246. Q. Did you meet his brother, and did
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 that you met in Ireland was? A. Conor. 234. Q. That's his first name? A. Yes. 235. Q. And do you have his last name or his contact information there? A. I am just looking right now. Brett, B-R-E-T-T. Now, I don't know if I spelled his name wrong myself. I have got only one "N", but I might have spelled it wrong. 236. Q. Okay. A. So, it's Conor Brett. 237. Q. All right, anything else, sir, that could help us contact him? A. Okay, hang on a sec. That's the number I have for him. 238. Q. Okay. I am just going to pass this to Erin to jot it down. 	4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22	 The things that I said I'm seeing. And he said, "Hey, look, you know what? I pay myself, I'm an executive," blah, blah. And I said, "You know what, you and your stupid titles and everything else. Okay, the way you are spending, even a guy making \$250,000 to \$500,000 a year wouldn't be able to spend like this. So, I need to know what the hell's going on." And this is where we really got into it. 243. Q. Yes, there was a falling out at some point A. Oh, there was a major falling out. 244. Qwhich we are going to come to. But two cars for his brother? A. Yes. 245. Q. What was his brother's name? I was going to ask what was his brother's name and what was the make of the car? A. I don't remember.

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\$	Sheet 18 Page 66 L. Guarini - 66		L. Guarini - 68
1	R, I think.	1	now, Lorenzo, is I want to talk about Chris Smith.
23	247. Q. Kumar Dixit? A. Yes.	2	A. Okay. 261. Q. And it's going to be the same series
4	248. Q. And how do you know that he bought a	4	of questions, just in terms of things that you
5	car for his brother?	5	might have seen over the years, in terms of Chris'
6	A. Somebody in the office had told me.	6	lifestyle. I mean, I know he was tight with a penny
7	Somebody at Stellar Point had told me. And I think he let it out, too.	7	at the beginning, was your evidence. A. Oh, yes.
89	249. Q. Do you know anything more about	9	262. Q. So starting there, tell me how
10	that, in terms of type of car, when he bought it?	10	things changed with Chris Smith, in terms of what
11	A. I don't know if it was a vanI		you saw and heard.
12 13	think it was a van. Actually, I think it was Stephanie that told me that.	12	A. Well, you know, with Chrisand even when I spoke with the police, Chris was a good
14	250. Q. Stephanie told you about the car for	14	guy. He seemed very genuine and a good heart. And
15	Kumar Dixit?	15	I testified to the police with that, like, the kind
16	A. Yes, I think it was Stephanie that	16	of person he was and the type of person he was. But
17 18	told me that. And I think 251. Q. So who else	17	Chris was not stupid or a spendthrift or a showoff or anything like that. That's not what his main aim
19	A. I think he wasKumar was in	19	was. It was to start this company and succeed in
20	Vancouver at the time. I don't know if he is still	20	business. But from what I knew of Chrisand I
21	there or not.	21	hadn't known Chris that well.
22	252. Q. Sorry, who elsethere was a second car that you had mentioned?	22	I knew of Chris through another network marketing company from years back. But he seemed to
21 22 23 24 25	A. Yes, one for his sister. And if I	24	me, a guy of modest means. He had some money, I
25	am not mistaken, I think that was a Mercedes.	25	guess
,	Page 67		Page 69
1	L. Guarini - 67 253. Q. And can you tell me his sister's	1	L. Guarini - 69 263. Q. Now, let's talk about when you first
2	name?	2	met Chris. And I assume from what you said earlier
3	A. I'm just trying to remember. It	3	that that was when Raj introduced you to Chris in
4 5	was 254. Q. Was it Reema?	4	early, early Banners Broker day.
6	A. Reema, that's it.		A. Yes. 264. Q. So, what was Chris' lifestyle like
7	255. Q. And how did you hear that Raj Dixit	7	then?
8	bought Reema a Mercedes?	8	A. He seemed to beyou know, he
9 10	A. I saw it. I saw it at the Stellar Point office.	9	wasn't well off, that's for sure. Because from what I was I wasn't told, but I heard, thatand I was
10			i wasi wasiri ibiu, bul i nealu, inalanu i was
111		1111	told by Rai that Chris had the idea, the whole scope
11 12	had bought her the Mercedes?	11	told by Raj that Chris had the idea, the whole scope of everything, but he didn't have enough money to
12 13	had bought her the Mercedes? A. No, it was apparent. I knew that	12	of everything, but he didn't have enough money to launch the company. And Kul had borrowed money from
12 13	had bought her the Mercedes? A. No, it was apparent. I knew that she didn't buy it.	12 13 14	of everything, but he didn't have enough money to launch the company. And Kul had borrowed money from his sister and brother-in-law in order to get this
12 13 14 15	had bought her the Mercedes? A. No, it was apparent. I knew that she didn't buy it. 257. Q. But you saw her driving it?	12 13 14 15	of everything, but he didn't have enough money to launch the company. And Kul had borrowed money from his sister and brother-in-law in order to get this company up off the ground. But Chris didn't come
12 13 14 15 16 17	had bought her the Mercedes? A. No, it was apparent. I knew that she didn't buy it. 257. Q. But you saw her driving it? A. Oh, yes. 258. Q. And what about Stephanie Dixit? Do	12 13 14 15 16 17	of everything, but he didn't have enough money to launch the company. And Kul had borrowed money from his sister and brother-in-law in order to get this company up off the ground. But Chris didn't come acrosslike I said, he wasn't rich by any means, nor did he come across that way at the beginning.
12 13 14 15 16 17 18	had bought her the Mercedes? A. No, it was apparent. I knew that she didn't buy it. 257. Q. But you saw her driving it? A. Oh, yes. 258. Q. And what about Stephanie Dixit? Do you know the types of things that Raj might have	12 13 14 15 16 17 18	of everything, but he didn't have enough money to launch the company. And Kul had borrowed money from his sister and brother-in-law in order to get this company up off the ground. But Chris didn't come acrosslike I said, he wasn't rich by any means, nor did he come across that way at the beginning. 265. Q. Okay.
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12 13 14 15 16 17 18 19	 had bought her the Mercedes? A. No, it was apparent. I knew that she didn't buy it. 257. Q. But you saw her driving it? A. Oh, yes. 258. Q. And what about Stephanie Dixit? Do you know the types of things that Raj might have bought for Steph? You mentioned the ring, purses. A. Clothes. 259. Q. Where did he shop for Stephanie, if you know? 	12 13 14 15 16 17 18 19 20 21 22	of everything, but he didn't have enough money to launch the company. And Kul had borrowed money from his sister and brother-in-law in order to get this company up off the ground. But Chris didn't come acrosslike I said, he wasn't rich by any means, nor did he come across that way at the beginning. 265. Q. Okay. A. You know, he was good to everybody when they were working at the office. And you know, he would drop by, they would order food, takeout, takeout, takeout. Because they didn't want to
12 13 14 15 16 17 18	 had bought her the Mercedes? A. No, it was apparent. I knew that she didn't buy it. 257. Q. But you saw her driving it? A. Oh, yes. 258. Q. And what about Stephanie Dixit? Do you know the types of things that Raj might have bought for Steph? You mentioned the ring, purses. A. Clothes. 259. Q. Where did he shop for Stephanie, if 	12 13 14 15 16 17 18 19 20	of everything, but he didn't have enough money to launch the company. And Kul had borrowed money from his sister and brother-in-law in order to get this company up off the ground. But Chris didn't come acrosslike I said, he wasn't rich by any means, nor did he come across that way at the beginning. 265. Q. Okay. A. You know, he was good to everybody when they were working at the office. And you know, he would drop by, they would order food, takeout,

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1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 20 21 22 3 24 25	 Sheet 19 Page 70 L. Guarini - 70 And to show you that, because when he brought me on for support, he paid me a whopping \$200. Even if I was doing 14 hours a day, right. You are talking 70 hours a week. So, he didn't offer unless I started saying something. 266. Q. And you mean \$200 a week? A. A week, that's it. But, you know what? I was having fun with the people, and I was having funI was doing something. And so I didn't complain until later. And then when I did complain, he gave me a raise, right? 267. Q. So Chris, you have told us about Chris at the beginning A. Yes. 268. Qwhen you met him. If so, how did it change over the years? A. Well, over the years, I mean, he still wasn't the type to go and, "Bring me Armanis", put on the big rings or anything. He had none of that. Even during the growth and everything else, he didn'the spent time at the office, at the office, okay? But later on, the indulgencesyes, he bought himself suits. He wasn'the had a ring. But these were all pushed on him by Raj, "Hey, you're the president/CEO," 	$ \begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 24 \\ 25 \\ \end{array} $	 Page 72 L. Guarini - 72 What else? Chris also got a vehicle. I can't remember what his first vehicle was, but I think, if I am not mistaken, it was a Mercedes. What else? You see, Chrisit's difficult for me to tell you, because Chris, I saw Chris lots of times. We would go, we would have dinner or something, but notI didn't visibly see him 271. Q. Did you ever go to his house? A. Only once, and it wasn't a house, it's right here, downtown, where the offices were. 272. Q. On Jarvis? MR. ELLIS: Church. THE DEPONENT: Church. Yes, it wasn't Jarvis. BY MR. WARD: 273. Q. So you never went to his personal residence? A. No, never. 274. Q. And did the Rolexes that Chris and Raj picked up in Ireland, did you see them, did you see the watches? A. No, I saw Raj's watch. I never saw Chris' watch. But I know they both went and got one.
1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 13 14 15 16 7 18 9 20 21 22 23 24 25	Page 71		Page 73 L. Guarini - 73 275. Q. How is it that you know that? A. Raj told me. So, that, I can tell you I know. Theyyou know, they spent money. But Chris wasn't the kind of guy to spend money on the baubles and everything else. You know, Raj, "Yes, come on, man, we deserve it. Let's go get Rolexes" or whatever. Chris wasn't like that. But, only from what I have been told and read, I guess he liked to buy properties. So I had no idea about that until I read about that. 276. Q. And where did you read about that? A. Online where somebody sent me the Spergel report. 277. Q. Okay. A. And wow, when I read that. 278. Q. Did Chris or Raj or Josun ever tell you about any of Chris' properties or investments? A. No. 279. Q. And did anyone A. I knew about the Stellar Point building, nothing else. 280. Q. The Stellar Point building in Whitby? A. In Whitby. 281. Q. Right.

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	Sheet 20 Page 74		Page 76	
	L. Guarini - 74		L. Guarini - 76	
1	A. I knew that they had bought that	1	A. It was around the fall, right after	
2	property there.	2	the Niagara Falls	
23	282. Q. And apart from what you read on the	3	296. Q2013, does that sound right?	
4	Internet, did you hear anything else aboutor read	4	A. Yes.	
5	anything also shout investments that Chris may have			
	anything else about investments that Chris may have	5	297. Q. September of 2013?	
6	had around the world?	6	A. Yes.	
	A. No.	7	298. Q. Okay.	
8	283. Q. In Canada or outside of Canada?	8	A. So, I will say, yes, just after the	
9	A. I knew nothing.	9	Niagara Falls event, whatever date that was, that	
10	284. Q. Okay.	10	was basically the end for me.	
11	A. Like, when I read in that report	11	299. Q. Okay, so tell us everything about	
12	about some building here in Toronto, I knew nothing.	12	howwhat led up to the end and how it ended.	
13	285. Q. All right.	13	A. Well, again, I was travelling and my	
14	A. But obviously, that is where Chris	14	joband my son was my assistant at the time. So	
15	liked to spend his money.	15	my job was to go out there, do the presentations for	
13 14 15 16	286. Q. And let's just go through the three	16	people that didn't know the business and then also	
17	of them, when was the last time that you had any	17	be a support person for all these people, for people	
18	contact with Josun?	18	that had any issues or concerns or whatever. And so	
19	A. Oh, God. I am going to say	19	I had gone to Irelandand I can't give you the	
20	Portugal.	20		
21	287. Q. And Smith?	21	date, but there started to be a concern with me	
20		22	because people were asking me about not being paid,	
22	A. Smith? I can't give the date. I		when and why weren't they being paid, and I needed	
20	saw him last year sometime.	23	answers. Because that's my job, is to basically be	
20 21 22 23 24 25	288. Q. And by "contact", I mean see him or	24	the brand ambassador and be a liaison to the people.	
23	speak to him on the phone or e-mail him.	25	And so I would take these issues back to	
	Page 75		Page 77	
	L. Guarini - 75		L. Guarini - 77	
1	L. Guarini - 75 A. No.	1	L. Guarini - 77 the company and I would talk to Chris and I would	
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	Sheet 21 Page 78 L. Guarini - 78		L. Guarini - 80
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1	now I don't know if you understand Banners Broker,		the issuesmy son would write down and take
2	the workings of Banners Broker.	23	everybody's issues down for me, and then I would
3	But apparently, what had happened, from		take them back. And I took them back to the Stellar
4	what I was told from Chris and Raj, is when people	4	Point office, like I was telling you before, and
5	would purchase traffic packs and purchase panels,	5	went to support and said, "This person here, do you
6	what would happen was, if you had \$1,000 in your	6	have them in there?" And they would search and they
7	eWallet to purchase panels or traffic packs product,	4 5 6 7	would say, "Yes." "What answer did you give them?"
8	what would happen was people were able to purchase	8	And they said, "Well, we didn't give them any
9	\$5,000 worth of product even if there was only	9	answer." And I would tell them, "Why didn't you
10	\$1,000 in their account.	10	give them an answer?" One of the other support
11	I said, "Well, how is that?" He said,		people went and called Raj.
12	"Well, we screwed up." I said, "What do you mean	12	
13	vell, we solewed up. I sald, what up you mean	13	Raj came out and made a scene in front of
	you screwed up?" This is what I found out		everybody saying, "This is none of your business.
14	afterwards. What had happened was people were	14	Support is none of your business." And I said, "In
15	buying \$5,000 worth of products for less than \$1,000	15	your office now." Because I worked for BB, I don't
16	in their account. And what would happen is their	16	work for Stellar Point and nobody talked to me like
17	account would go minus-\$4,000. Now, these panels,	17	that. Nobody.
18	that brought traffic to these panels, the traffic,	18	So, when I went into his office and I said,
19	they would get paid almost three times or four times	19	"I need answers. Don't you tell me it's none of my
19 20	the amount of money that they had there. So, as an	20	business. I've got people who have concerns and I
21	example, "Hey, I'll go \$4,000 in debt if it's	21	need to give them answers. I want to know why
22 23	bringing me back \$16,000." I don't have a problem	22	payments haven't gone out. I want to know why
23	with that. And they shouldn't have been allowed to	23	people aren't getting paid." This is where our
24	do that.	24	fallout started.
25	Well, from, especially the two countries	25	300. Q. Okay, that conversation, tell us
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 20 21 22	L. Guarini - 79 that were the culprits. We will just say the worst culprits were the U.K. and Ireland. And so they told their brother, their sister and everybody else, which kept buying all these panels even though their accounts were going in the hole. Chris says something to me, and I don't know how many days after or weeks, and it could have been a couple of months after, but this is what I have been told by Chris and Raj now, is that the company now just went \$39 million in the hole. Because all these people purchased panels without any income coming into the company. And so they are \$39 million in the hole. This is what I was told. So when I went to Ireland, I explained this to the folks in Ireland of, "This is what's happened. And Chris is going to right the ship, put it back on course." Like I said to you, I mean, I can only go with what I am told. And I had no reason to believe that Chris wasn't going to right the ship. Because Chris was alwaysto be honest, he was always good to me. And he always seemed forthright to me. I was happy for him that	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Page 81 L. Guarini - 81 everything that you remember about it exactly as it was said, in his office. A. It was almost pretty well what I was telling you just now. "I want answers." And he said, "It's none of your business, Zo. Your job is to be the brand ambassador." I said, "My job is to go out and show people what a great business this is. I'm not seeing this as a great business right now. I'm seeing a lot of concerns and it's concerning me. I don't like what I'm seeing. So, the hell with you. One of these to you. I'm going to Chris." And he said, "You are going above my head?" "What do you mean above your head, who the hell are you? Who are you? What, do you think you are my boss?" Okay, he owns this company. I'm here because I'm having fun. Otherwise, Chris don't even tell me what to do. "I'm just here to do presentations, be good to people. As long as everybody is making money and everybody is happy, I'm happy. But I'm not going to do presentations if you guys are screwing up. And with what I'm seeing

	et 22 Page 82		Page 84	66
1 2 3 4 5 6 7 8 9 10 11 12 13 4 5 6 7 8 9 10 11 12 13 4 15 16 17 8 9 20 21 22 23	L. Guarini - 82 you are spending money like it's water. I don't like what I'm seeing." So that was it, end of conversation. I called Chris and I told Chris, "Look, buddy, you need to really, really bear down and I need answers, Chris." I told him the situation of what happened in the Stellar Point office. And he said, "I know, Zo. Listen, just calm down", because I can get testy. Basically, I didn't like that answer either. And I said, "Listen, if I don't get answers, I want to know why people aren't getting paid, Chris." "Now, what happened before, you are going to right the ship and everything else. What's going on right now, I need to know why people aren't getting paid. At the very, very least, give me something credible, because I can't believe this anymore. Not with the expenditures and what I'm seeing going on with this little Hitler and what he's doing with monies. What the hell, Chris? And who's giving him all this money? So I have to question him now. So I have got to question you. If the people aren't getting paid but he's spending money like it's no tomorrow, how can the people not get paid?"	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	L. Guarini - 84 A. No. 303. Q. Okay. A. And they phased me out. So, even as the brand ambassador, I could still go in, and you could call me from anywhere in the company. People could call me directly if they wanted. And I had access where I could go in and say, "Something was missing from your account" or "you need a new password or a reset or something". I had access, I could fix people up in a snap, no problem. And then I can't log in. No access. They slowly but surely cut me right out. 304. Q. Did they replace you with someone? A. I'm sure they did. 305. Q. Do you know who? A. Well, he called himself Ron Anderson. 306. Q. Did he have another name? A. Yes, I'm sorry, guys, I can't remember. 307. Q. Rob Pirie? A. Yes, Rob. Yes, that's it. It's just sometimes I just need a 308. Q. So do I. After the call with Chris,	
Page 1 2 3	L. Guarini - 83 "Zo, calm down. Things are going to get fixed up, it's just because of the situation." I said, "You know what, Chris, I can't be party to this, man. I	1 2 3	over what period of time were you phased out, Fage 85L. Guarini - 85 Lorenzo? A. Oh, it wasn't long. It wasn't long after that Niagara Falls	
5 6 7 8	won't be." And from there on inI spoke to Chris after that, but that was basically for me, that was the end. Something wasn't right and I started getting scared. And when I questioned them on this blind network, I even looked up "blind network", and it's real. Like when I asked them, "Is this blind	4 5 6 7 8 9	 309. Q. Ďays? Weeks? A. Say weeks. But I hadn't been online and didn't really use it that much anyway, because I was really withdrawn, I wanted 310. Q. Did you go to work after that? A. No. 311. Q. And you didn't so any other 	
12 13 14 15 16 17	network for real?" They looked at me, like, disgusted. How dare I even question it. And so I kind of felt bad, right. But a blind network, "What the hell's a blind network?" I mean, if I am advertising for crying out loud and I can't see my advertisements. But apparently there really is blind network. But it just	11 12 13 14 15 16 17	conventions or meetings? A. No. That was my finalNiagara Falls was my final. 312. Q. And Niagara Falls, just so I am clear, was that before your conversation with Chris that you described on the phone? A. I can't remember.	
20 21 22 23 302. 24	 Q. So the conversation that you had with Chris, that was on the phone? A. Yes. I was really upset, so I had to try and calm myself down, because I cared about the people. Q. Did you do customer service or brand ambassador work for the company after that call with Chris? 	18 19 20 21 22 23 24 25	 313. Q. Okay, and what about Dixit, did you have any further discussions with Dixit? A. After that? 314. Q. Or his lawyers, after the falling out with him at the officein his office? A. Yes, becauseI had my monies in that joint account. And he had stolen my money. And that's another thing. It gets wonderful. So, 	

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1 h 2 o 3 tl 4 L 5 b 6 tu 7 T 8 y 9 y 10 c 11 S 12 it 13 p 14 E 13 p 14 E 15 tf 16 tf 17 tf 19 ff 20 g 21 315.	L. Guarini - 86 L. Guarini - 86 him and the English wonder there, Hooker, another bh, God, justanyways, between him and Hooker, hey had more bright ideas. Because, you see, what Dixit wanted to do was start all kinds of different businesses. And so I had come backand I can't ell you which trip it was, it could have been Trinidad. Everybody in the officeand I got to tell you this. It's not to brag or anything. When I came into that office, either one, Toronto or Stellar Point, people went, "Ahhhh", and you see t. Because, you know, it was fun. You just treat people with respect and have fun and people relaxed. But they were always tensed up around this guy. So, I come back, people, everybody in there yould tell me if things were going on, good or bad. Everybody always wanted to come talk to me and share he beef, we'll just say. So, I come back and I ind out that that him and Halchern (phon.) are going to start a gentlemen's club. Q. Dixit and Halchern? A. Dixit and Halchern. Wonderful idea. Now, I know Oshawa, I have lived there all my life.	1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Page 88 L. Guarini - 88 put aside. I never spent my money. I never spent my pay. So that's where 316. Q. Okay, and did the gym get off the ground? Did it go anywhere? Was it set up? A. Yes. That's what Glenroy can tell you more. 317. Q. Yes, and was that Funkional Fitness. A. Yes, see how they spelled "Funkional", so 318. Q. Yes, that's right, with "K". And what about the gentlemen's club beside it, was that ever set up? A. Never. It never got set up. Never got off the ground. 319. Q. And the money that went intothat you believe that Dixit put into Funkional Fitness, do you know where that money came from? A. It's from that joint account that I told you. 320. Q. Okay. And that's what I am going to try and get you guys, to see if I can get the access. And the reason why I didn't get rid of it, is 	
24 A 25 g	And to boot, beside the gentlemen's club, they are poing to open up a gym. They rented this great big	24 25	becausehe sent me a letter from his lawyer, okay, and I just thought, "Either this lawyer has got to	
2 S 3 th 5 6 6 1 7 th 9 0 10 \$ 10 \$ 11 \$ 12 \$ 13 \$ 14 \$ 15 \$ 16 \$ 17 \$ 18 \$ 19 \$ 20 \$ 21 \$ 22 \$ 23 \$ 24 \$	L. Guarini - 87 blace on Thornton Road, Thornton Road and King street. And it was behind the building, which you an't see. Boy, it's going to be real popular. And hey are going to start this gym and he's going to becomethis guy is the most stupidest businessman have ever seen in my life. So, right up the road about 600 yards is he Civic Auditorium in Oshawa with a track, two dympic-sized swimming pools, weight rooms, that you ould pay \$30 a month for. But he's going to charge 1100 a month. So I went to see this place. And he had to out \$50,000 down on the building for rent. And to op if off, I went in there and he says, "I said, vell, what's going to distinguish you from the Civic auditorium?" "Well, I've got MMA and I got a boxing ing." I said, "But this is tiny, man, it's a tiny lace. And no vents. Can I ask you a question? Vhere are people going to get changed?" There was a athroom there that was one stall. It was like oing to the bathroom in here. "You are talking a ym here and you want to charge \$100 a month? Are ou serious? What a waste of time and money." And it goes without saying, because a lot f that money that went into that gym was my money I	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\\24\\25\end{array}$	 L. Guarini - 89 be the stupidest man on Earth to actually be party to that letter." "I agree to give you your money so long as you and your wife and your son don't talk bad about me" And you think I'm going to sign that? 321. Q. Okay. A. "You took my money and you want me to basically sign a piece of paper with conditions and then you will give me my money back. Well, I don't think so. It's not going to happen." So this is why, not long ago, I went to see him. "Are you going to give me my money or not? Because right now, I'm almost to the point of bankruptcy." 322. Q. What does he owe you? A. Over a hundred grand. 323. Q. Lorenzo, we will get to that in a minute. A. Sorry, I didn't mean to be rough. 324. Q. No, no. A. Oh, there is more. 325. Q. Go ahead. A. There's more. It's not only that he started the gym, okay, but 2008, around that time, 	

	Sheet 24 Page 90		Page 92
1	L. Guarini - 90		L. Guarini - 92
1	we were looking at starting something together.	1	334. Q. And so you went to his house?
2	326. Q. Sorry, did you say 2008?	2	A. Yes, but a long time ago, he had
3	A. I will say 2008.	3	rented my cousin's house to live in, before he went
4	327. Q. 2008, seven years ago?	4	to Coyston. And he rented my cousin's house in
5		5	Whithy Fraderick Street I think it's Fraderick
	A. I would say around then, okay. I am		Whitby, Frederick Street. I think it's Frederick
6	not 100 percent sure.	6	Street. And he left behind pictures of his kids and
	328. Q. Right.		stuff like that. So when it had to get re-rented,
8	A. But just to give you an idea, we	8	we had to get everything out of there, so my cousin
9	were going to start something. And it was an online	9	gave them to me and then I went and brought him back
10	business also. He ended up starting another	10	his pictures to give me the excuse to try and dig to
11	business called RevStar Global and that's online		see if I could find anything more about where he has
12	today.	12	got money.
13	Now, I know, after seeing all these	13	335. Q. Right. So what else did he tell you
14	corporations and his mother and sister and the dog	14	during that meeting? Like, what else do you recall
15	is the vice-president and all this other stuff, I	15	in terms of the discussion?
16	know that he has got money. And it's in my best	16	A. The discussion was, "Well, I don't
17	interest to try and chase this guy down. So he's	17	know why they are trying to come after me. Chris is
18	saying he's got no money. He's also saying he	18	the one with all the money." I didn't say anything
19	doesn't own RevStar Global, it's Paul Rédmayne.	19	without laughing. Because it wasn't just Chris, it
20 21	Paul Redmayne is the guy that seemed to own RevStar	20	was him too. He talked to me about them raiding his
21	Global. He owns RevStar Global. He has removed his	21	house early in the morning, taking his computers and
22	name. And I will do my damnedest to find out	22	some other stuff. They didn't touch anything else,
22 23	exactly, but I know that I know, because he told me.	23	he has still got all that furniture, he's still got
24	He got raided by the police and they took all his	24	that pool table, he's got the big screen TVs, you
25	computers and RevStar, he doesn't know how he's	25	name it, he's still got all that. I know he does.
	Page 91		Page 93
	L. Guarini - 91		L. Guarini - 93
11	going to make payments to the people. So he does	1	I didn't go into his house, but, I could see
2	have an interest in RevStar Global.	2	everything still there that was intact.
3	329. Q. Rajiv Dixit told you that he owns	23	336. Q. So you just spoke to him on the
4	RevStar Global?	4	
5			porch then?
	A. I knew he owned it		porch, then?
	A. I knew he owned it.	5	A. Yes.
6	330. Q. And he set it up in Paul Redmayne's	56	A. Yes. 337. Q. Okay.
6 7	330. Q. And he set it up in Paul Redmayne's name?	5 6 7	A. Yes. 337. Q. Okay. A. And then on the porch and then we
6 7 8	 330. Q. And he set it up in Paul Redmayne's name? A. Yes, because they alsoa part of 	5 6 7 8	A. Yes. 337. Q. Okay. A. And then on the porch and then we wanted a smoke so we went onto the sidewalk there,
6 7 8 9	 Q. And he set it up in Paul Redmayne's name? A. Yes, because they alsoa part of RevStar Global was Surf4Wealth and that was mine. 	5 6 7 8 9	A. Yes. 337. Q. Okay. A. And then on the porch and then we wanted a smoke so we went onto the sidewalk there, in front of his house.
6 7 8 9 10	 Q. And he set it up in Paul Redmayne's name? A. Yes, because they alsoa part of RevStar Global was Surf4Wealth and that was mine. So I would go and just take a look and see this 	5 6 7 8 9 10	A. Yes. 337. Q. Okay. A. And then on the porch and then we wanted a smoke so we went onto the sidewalk there, in front of his house. 338. Q. Anything else about RevStar Global
6 7 8 9 10 11	 330. Q. And he set it up in Paul Redmayne's name? A. Yes, because they alsoa part of RevStar Global was Surf4Wealth and that was mine. So I would go and just take a look and see this RevStar Global, I would click in online. All of a 	5 6 7 8 9 10 11	A. Yes. 337. Q. Okay. A. And then on the porch and then we wanted a smoke so we went onto the sidewalk there, in front of his house. 338. Q. Anything else about RevStar Global or Paul Redmayne in that discussion?
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Sheet 25 Page 94 L. Guarini - 94 L. Guarini - 96 A. He said, "I don't have it. If I had 1 A. So, I said, "Okay, I would like one 1 2 it, I would give it to you." And that's why I tried 2 too." And so he had set it up that we had a joint 3 3 account. Now, I have got at home, I'm sure of it, to keep it cool, because, with the situation that 4 4 I'm in, I mean, it's just crazy and ridiculous. And I have got at home the package. When this came out, 5 this is why I said to you, this has been nothing but 5 he had asked me to sign off to close that account. 6 6 351. a nightmare for me and my family. Q. And when you say "this", you are 7 7 Q. Lorenzo, how did that meeting with 343. pointing to the document at tab 27. 8 8 Dixit end, the one on his porch? A. Tab 27, yes. 9 A. Basically, he said, "Well, you take 9 352. Q. It's tab 27, that's right, okay. 10 10 care." And I said, "Well, look, Raj, let me know So, sorry, continue. 11 how things make out with the law", this thing he's 111 A. And I said, "No." Because it showed 12 got to go to court or whatever. "Let me know how 12 in there where he was spending money and everything 13 you make out." I didn't want to leave on a super 13 else. So, what I didn't want to do is close 14 bad end, because I was going to try and see what my 14 it...sign off and close it and then me not have any 15 wife and I could do to go to the registry, I want to 15 type of proof that my money was there. 16 see if, in fact, he has taken out more loans to pay 16 353. Q. Right. So, I needed to know. And that's 17 17 his lawyers. And if he didn't, then I want to take A. 18 18 him to court and...it's monies I never received. why I said, "No, I refuse to sign this ridiculous Q. Okay. I want to show you a document 19 19 344. thing", because all he would have to do is say, 20 20 "This guy said that you've been talking bad about in that brief, now, which ties into what we have 21 been talking about. A. Okay. 21 me", and then they screw me for my money. 22 22 354. Q. So, in terms of how the Cyprus 23 23 24 345. Q. And you will see it at tab 27. account was opened up, did he arrange for that? 24 A. Okay. A. Yes. 25 25 Q. And then we are also going to go off 346. 355. Q. Did you go to Cyprus? Page 95 _ Page 97 _ L. Guarini - 95 L. Guarini - 97 1 the record and take a break for about 10 minutes. 1 A. No, no. 2 2 A. Okav. 356. Q. Just tell me, how was it opened up? MR. WÁRD: And then we will come back 3 3 347. A. He opened it up. 4 and we will deal with that. So, you are 4 357. Q. And then he brought documents to you 5 5 6 welcome to take a minute and read it now or to sign? 6 when we come back. Yes. Α. 7 7 358. And do you have copies of those Q. 8 8 --- A BRIEF RECESS documents? 9 9 A. No. 10 LORENZO GUARINI, resumed 10 359. Q. No, why not? 11 CONTINUED EXAMINATION BY MR. WARD: 11 A. Because I am unorganized. Q. Okay, but you mention you have some 12 12 348. Q. Lorenzo, just before we get into the 360. document at tab 27, the Cyprus account, the bank documents in relation to the Cyprus account, that 13 13 14 account, I want to understand how it came to be set 14 you may be able to go in online and access it. 15 15 up, like, whose idea was it, who put the money in A. Yes, when you wanted to access your 16 it. Just tell me...like, tell me everything about 16 account, there is this electronic thing where you 17 17 the Cyprus Bank account. have got to put in a code. So you go online and 18 18 Well, he had started a Cyprus Bank then you ask for a code, it gives you the code, then A. you have got to go on this electronic thing. And 19 19 account. 20 20 349. Q. This is Dixit? you punch in the code and then it allows you to 21 21 actually access your office. So, I'm hoping Dixit. And so when I asked him A. 22 22 everything's good and I can bring that to yous and about it, he was explaining to me how he would have 23 24 23 show you through the entire... the money offshore but they pay good interest rates 24 Q. Now, have you tried to do that on the money. 361. 25 Right. 25 recently? 350. Q.

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\square	Sheet 26 Page 98 L. Guarini - 98		L. Guarini - 100
1	A. No.	1	in September of 2014.
23	362. Q. When was the last time you tried to	2	A. Really?
	do that?	3	376. Q. Yes.
4	A. It's been a long time. But, it just		A. Was Portugal 2013?
5	hit me today. 363. Q. This year? Did you try to do it	5	377. Q. 2012, I'm sorry. It was 2012.
6 7	363. Q. This year? Did you try to do it this year?		A. Okay. 378. Q. And you had your fallout in
8	A. No, not	8	September of 2013. So you have got a 14-month
9	364. Q. Last year?	9	window.
10	A. Yes. I would say last year.	10	A. M'hmm.
11	365. Q. So the account was set up by Dixit		379. Q. Was it towardsaround the time of
12 13	for you? A. Yes.	12	Portugal or was it around the time of your fallout
14	A. Yes. 366. Q. Why was it set up as a joint	14	or in the middle? A. I'm going to guess, but I'm going to
14 15	account?	15	say the middle.
16	A. He just said, "We might as well do	16	380. Q. Okay. And so Dixit, he told you
17	joint account, because it's going to cost twice the	117	that he put money in the account and then you went
18	money."	18	online and saw the money, is that what happened?
19	367. Q. Okay.	19	A. Yes. He put money in the account.
20 21	A. There are costs associated with	20	381. Q. The joint account? A. Yes.
22	having the bank over thereto save on costs, I guess.	22	A. Yes. 382. Q. And did he say that money in the
22 23 24	368. Q. Okay.	23	joint account was yours or his or both of yours?
	A. I had no problem with that. I had	24	A. Well, I mean, when you went into the
25	no reason to believe he would steal my money.	25	account there was two tabs. So one was his, the
	Page 99		Page 101
1	L. Guarini - 99 369. Q. Right. And then how much money was		L. Guarini - 101
2	369. Q. Right. And then how much money was put into the account when it wasat the beginning,		other one was mine. 383. Q. I see, okay.
3	when it was opened? Do you know?	3	A. But, I don't think he realized
4	A. I am lying if I even answer that. I	11	that when I logged into the account, I could see
5	don't know.	4 5	everything he was doing in his. So, there's all
6	370. Q. Did you ever personally put any	6	kindswell, I'm just hoping. Because if we
7	money in the account?		can get that you are going to be able to see
8 9	A. No. 371. Q. Did your wife or any companies that	8	expenditures, what came in from Banners Broker and whateverI don't know what the heck they called
10	she owns or you own put any money in that account?	10	it, whether it's Parrot Marketing or these other
11	A. No.	11	corporations or whatever.
12	372. Q. So did anybody put any money in the	12	384. Q. So for his side of the accountI
13	account?	13	mean, how frequently did you look at it?
14	A. Dixit put money in the account.	14	A. Not a lot. Because I figured it's
15 16	 Q. Okay. A. And I would assume that Banners 	15	just business, whatever they're doing. 385. Q. Right. And what were the
17	Broker put money in the account for me.	17	amounts that you saw going through that account,
18	374. Q. And how do you know that Dixit put	18	approximately?
19	money in the account?	19	A. Some transactions, I think, were
20	A. Well, when I checked the account, it	20	\$100,000, \$200,000, \$300,000. So, you know, it's
21	shows monies were put there.	21	hard for me tounless, I actually look at it. And
22	375. Q. And I suppose I should ask you, as well, do you recall when the account was set up?	22	you guys will be able to see for yourself. 386. Q. All right, and the account balances
20 21 22 23 24 25	And justI mean, keep in mind the Portugal	23	on his side, would they be high balances, low
25	convention was July of 2013. You had your fallout	25	balances, to the extent that you recall?
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	Sheet 27 Page 102		Page 104	
1 3 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 23 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 3 4 5 6 7 8 9 0 11 12 13 4 5 6 7 8 9 0 11 12 13 14 5 16 7 8 9 0 11 12 13 14 5 16 17 10 11 11 11 11 11 11 11 11 11 11 11 11	L. Guarini - 102 A. There would be a lot of money sent. It would be, like, a high balance and then, all of a sudden, a low balance because monies would go back out. 387. Q. What about your side of the account, what did it look like? A. Minuscule. But it wasn't huge, in any way. It's been so long, I justI don't remember numbers, but it was very minuscule. 388. Q. Right. Okay, so tens of thousands of dollars? A. Yes. Tens of thousands, not 389. Q. Okay, did it ever get over \$100,000? A. Well, it was supposed to be, yes. It did get over \$100,000. 390. Q. How high did it get? A. As far as I'm concerned, it was supposed to be, altogether, about \$130,000. And my monies, like I said, I didn't spend it. That was going to be my retirement, where I'll pay off my mortgage and pay everything off. And so, if I'm getting interest, hey, I'm making money on interest. So, I figured, okay, just leave it there, let it build.	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 20 10 11 12 13 14 5 16 7 8 9 10 11 12 11 12 11 12 11 10 11 11 11 11 11 11 11 11 11 11 11	L. Guarini - 104 were doing up there is one thing. Where's my money?" And so I approached them and told them, "Where is my money?" "What are you talking about?" "My money is gone." 397. Q. Dixit? A. Yes. "I want my money. I don't want to fight with you, I want my money put back in my account." And he said, "Well, noZo, I didn't realize." "Look, Raj. Okay, we have got a joint account. When did you figure there was an extra 130 grand, okay? Does that happen to you. There's only you and me. When did you figure, if that's gone" "Well, I didn't know, I thought our accounts were separate. And I didn't know that that was your money." So, when I saw these \$50,000that's where my money went, into that gym. He took my money. 398. Q. Okay. A. And I just wanted my money back. 399. Q. So you believe that he withdrew \$50,000 amounts and put it into the gym that you described earlier? The Funkional Fitness? A. Yes. 400. Q. What's the basis for that belief? A. Because it was the last monies, I	
25	391. Q. Yes.	25		
		25	believe, that was taken out.	
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 13 14 5 16 7 8 9 10 11 12 11 11	 L. Guarini - 103 A. Okay, as I am earning. Just let it go there. And here is what he is trying to say, telling you all this other stuff. 392. Q. And do we know the name of the bank, the bank in Cyprus? A. Yes. I'm really sorry. 393. MR. WARD: Okay, let's just go off the record for a sec. 594. Q. Now, at some point, I understand that you logged on to the bank account in Cyprus and you saw something was not right? A. Well 395. Q. So, tell me about that incident. A. Well 396. Q. When did it happen, what did you see, what did you do? A. Like I said, I really apologize, guys. I am not good on dates. I can't give you a specific date. But noticed that when I had logged in and basically, that account was drawing down to empty. And so my concern was, "Whatever you guys 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 32 4 25 20 21 22 23 24 25 25 20 20 20 20 20 20 20 20 20 20	 L. Guarini - 105 401. Q. From the bank account? But why do you think that the monies went into the gym, as opposed to somewhere else? A. The \$50,000 amounts? 402. Q. Right. A. Because I knew that he had paid \$50,000 for the rent on that gym. And it wasn't just \$50,000, it was probably \$200,000, \$300,000 that was wasted. 403. Q. On the gym? A. Yes. 404. Q. Okay, and so you noticed this and you went to see Raj. Did you go see him or did you call him up? What did you do? A. I went to see him. 405. Q. Where? A. At his house. We went into the basement. And I told himthat's where I saw the gadget for the watches. The whatever-you-call-it there, and told him. "I don't want to fight. I don't want to argue. I just want my money. Put my money back in my account." And he said he would. "I just don't have it right now", is what he said. "It's coming," because he's getting it from Chris. 	

L Guarni - 106 1 money? 2 A. No. 3 407. C. He dich't say, 'I took it and put it 4 in the gym?? 5 A. He said it was by accident, 'I 6 dicht't realize.' 7 408. O. Right, but did he say what he did 8 with it? 9 A. No. He dich't say that he put it in 1 the gym. O. Edit has you discussed a settlement 4 agreement with hin?? 6 A. No. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. He dich't say that he put it in 1 the gym. O. And you lock limp. Our our exist and free more from Chris. 1 So. Whatever monies were transferred from Chris. 1 So. Whatever monies were transferred from Chris. 2 A. And I was okay with that. I wasn't 2 happy. but I was okay. Because my money was going to 2 be put back. 2 Ham meeting with Chris, was that he would put the 2 money back in your back actualing, after 3 A. No, that we hore, for the 3 A. No, that we hore, for the 3 A. No, that we hore hore 4 413. O. So let's to go tab 27 of the 4 413. O. So let's to go tab 27 of the 4 413. O. So let's to go tab 27 of the 4 413. O. So let's to go tab 27 of the 4 413. O. So let's to go tab 27 of the 4 415. O. And what we have here, for the 4 fit. O. Which is not signed. And take a 4 fit. O. And what we have here for the 4 fit. O. Which is not signed. And take a 4 fit. O. And what we have here hor the 4 fit. O. And what we have here hor the 4 fit. O. Which is not signed. Multi bus put the sourd gray flow, bus were mating 4 fit. O. And what we have here hor the 4 fit. O. Which is not signed. Multi bus put the 4 fit. The mealing when his and rensform what's beagr					00
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8 with it? 9 A. No. He didn't say what he put it in 10 the gym, no. He didn't say what he did with it. 11 409. Q. And you tolk him you wanted it back, 12 and what did he say? 13 A. He said he didn't have it. Then, at 14 the time, it would take him about three or four 15 weeks, but he was going to get the money from Chris. 16 So, whatever monies were transferred from Chris to 17 this Stellar Point, he was going to put my money 18 421. Q. Okay. 20 A. And I was okay with that. I wasn't 19 400. Q. Okay. 21 hand was okay with that. I wasn't 16 A. No. 21 hand was okay with that. I wasn't 16 A. No. 21 hand was okay with that. I wasn't 16 A. No. 22 be put back. That's money that I earned. 23 A. No. that's when this came up. 4 411. Q. And so your understanding, after 24 G. Did he ever do that? 3 A. No. that's when this came up. 4	7		1 7		
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12 and what did he sáy? if the weak is a point file is a point file. And is guess it got back to him, and then it wasn't long after, I got this letter from him. 13 A. He said he didn't have it. Then, at the file. And is guess it got back to him, and then it wasn't long after, I got this letter from him. 16 421. Q. Okay. 17 this Stellar Point, the was going to put my money back. 16 18 back. A. And I was okay with that. I wasn't long after, I got this letter from him. 19 410. Q. Okay. 20 A. And I was okay with that. I wasn't happy, but I was okay, because my money was going to put back. That's money that learned. 2. 21 happy, but I was okay, because my money was going to put my money back in your bank account in Cyprus? 422. Q. So, let's ig ust go through it and see what he's saying: 24 11 Q. And your understanding, after 4. 4. A. No, that's when this came up. 4 4. Q. So let's to go tab 27 of the document brief. G. What is Dixit referring to when he says that there's a '100.000 bonus to you? 5 A. Yes. 4. G. And it's dated September the 18th, 2. Yes. well, the '\$100.000 bonus to you? 6 A. Yes. A. Yes. 423. Q. Mint is not signed. And take a mif er		409. Q. And you told him you wanted it back.		afterbecause I was upset and some people knew	
13 A. He said he didn't have it. Then, at 14 the time, it would take him about three or four 15 weeks, but he was going to gut the money from Chris. 16 So, whatever monies were transferred from Chris to 17 this Stellar Point, he was going to gut my money 18 a. And I was okay, because my money was going to gut my money 19 410. Q. Okay. 11 haws okay. because my money was going to gut my money a. And I was okay. because my money was going to gut my money 12 be put back. That's money that I earned. 14 13 I. And so your understanding, after is as follows: \$100,000 bonus to you. 14 Q. And so your understanding, after is as follows: \$100,000 bonus to you. 14 Q. Did he ever do that? A. Yes. 24 413. Q. Did he ever do that? A. Yes. 3 A. No, that's when this came up. 4 4 Q. And if's dated September the 18th. 12 16 A. Okay, yes. 4 6 A. Okay, yes. 4 7 A. Mirm. 4 8 record, is an e-mail from Mr. Dixit to yourself.	12	and what did he sav?		from me, that he had taken my money. I told people	
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15 weeks, but he was going to get the money from Chris. 15 letter from him. 16 421. Q. Okay, so you weren't expecting this 17 this Stellar Point, he was going to put my money a. A. Mail was okay with that. I wasn't 18 A. No. 19 422. Q. So, let's just go through it and see 20 A. A. I was okay, because my money was going to 19 422. Q. So, let's just go through it and see 20 A. A. I was okay, because my money was going to 19 422. Q. So, let's just go through it and see 20 wath he's saying: "Chris has sent me the money to pay you 22 and I'm willing to do that. The breakdown 23 411. Q. And so your understanding, after 24 So just stopping there. 24 24 11 A. Yes. G. G. G. 24 12. Q. Did he ever do that? Yes. G. G. 3 A. No, that's when this came up. 413. G. So just stopping there. 2 <td>14</td> <td>the time, it would take him about three or four</td> <td></td> <td>him, and then it wasn't long after. I got this</td> <td></td>	14	the time, it would take him about three or four		him, and then it wasn't long after. I got this	
16 So, whatever monies were transferred from Chris to 17 this Stellar Point, he was going to put my money 18 back. 19 410. Q. Okay. 20 A. And I was okay, with that. I wasn't 1 happy, but I was okay, because my money was going to 21 happy, but I was okay, because my money was going to 23 411. Q. And so your understanding, after 25 money back in your bak account in Cyprus? 24 24 that meeting with Chris, was that he would put the 23 25 money back in your bak account in Cyprus? 24 26 L. Guarini - 107 A. Yes. 26 A. No, that's when this came up. 4113. 411. Q. Did he ever do that? A. No, that's when this came up. 411. Q. So let's to go tab 27 of the 3 6 A. Yes. 3 7 414. Q. And was det ag bours of 7 414. Q. And what we have here, for the 9 A. Yes. 3 9 A. Yes. 3 10 2013. And attached to the e-mail is a four-	15		115		
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20 A. And I was okay with that. I wasn't hapy, but I was okay, because my money was going to be put back. That's money that I earned. 21 "Chris has sent me the money to pay you 21 be put back. That's money that I earned. 22 and I'm willing to do that. The breakdown 23 411. Q. And so your understanding, after is as follows: \$100,000 bonus to you, 24 that meeting with Chris, was that he would put the money back in your bank account in Cyprus? is as follows: \$100,000 bonus to you, 24 1 A. Yes. 24 \$30,000, three months' pay to you, \$18,000 25 money back in your bank account in Cyprus? L. Guarini - 107 1 A. Yes. 2 412. Q. Did he ever do that? 3 A. No, that's when this came up. 3 413. Q. So let's to go tab 27 of the 5 A. Yes. 4 413. Q. And what we have here, for the 6 basically saying that I was getting a bonus of 7 414. Q. And what we have here, for the 7 \$100,000 and I wasn't. That was my pay for quite a 8 while of work. Now, they had given me a raise, I 9 don't know the exact amount but they had given me a raise, I 9 9 A. Tha	19			422. Q. So, let's just go through it and see	
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20 he had stolen my money. And so that upset him.					
21 because that embarrassed him.	20	he had stolen my money. And so that upset him,	20		
	21	because that embarrassed him.	21	425. Q. And what did it change to, how much	
22 417. Q. Okay. 22 per month?	22		22		
23 A. And so, when I received this, he got 23 A. It was gradual. So, I'll just say		A. And so, when I received this, he got	23		
24 it done through his lawyer. 24 \$500 a week, depending on what I was doing. It	24	it done through his lawyer.	24	\$500 a week, depending on what I was doing. It	
25 418. Q. Had you discussed a settlement with 25 wasn't a standard thing, okay. And then as my	25	418. Q. Had you discussed a settlement with	25	wasn't a standard thing, okay. And then as my	

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	Sheet 29 Page 110		Page 112	
1 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 8 9 20 21 22 23	 L. Guarini - 110 travelling and everything else started getting grander on that scale, then he started covering, "Zo, I'll pay for your expenses, the hotel expenses. You need to take leaders out", so they would put money on a card. And say, "Okay, just take the money off the card if you need to take some of the leaders out, dinners and whatever, just cover your expenses." 426. Q. A credit card? A. Yes. So when it comes to that, my son hadhe was also distributor. Not distributor, what's the other word? 427. Q. Affiliate? A. Affiliate? A. Affiliate? A. Affiliate. He was also an affiliate before he became my assistant. So they made him give up his account. He never received a dime of that money. 428. Q. So is that the \$18,000 amount that's described as "Nick's payout"? A. Yes. 429. Q. But I justI need to understand how your salary changed. And I know \$200 a week, 	$ \begin{array}{c} 1 \\ 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 22 \\ 22 \\ 22 \\ 22 \\ 22 \\ 22$	L. Guarini - 112 not mistaken, so they wereI was getting the raise. So I was going to start getting \$10,000 a month. At that time, this "\$30,000 three months' pay" was for, if I'm not mistaken, August, September and October. Because I had left, if I'm not mistaken, in August. 435. Q. Okay. A. So, this "\$30,000 three months' pay to you" is monies that he is sayingbecause I had got the raise. I was supposed to start 436. Q. Like a severance payment. You had stopped, had the fallout in his office, right? A. Right, and so I was supposed to get paid from there on in, \$10,000 a month. 437. Q. Got it, okay, I understand. A. Yes. 438. Q. And up untilwell, at any point, did you ever have a written employment agreement with Chris or Dixit or any of their companies? A. Not to my knowledge, no. 439. Q. And so was everything just negotiated orally. Like, requests for raises and	
23 24	then up to \$500 a week, plus your expenses?	23	things like that?	
24	A. Yes. 430. Q. Then what did it change to after	24 25	A. Yes. 440. Q. Okay. So going through the e-mail,	
	Page 111		Page 113	
1 2 3 4 5 6 7 8 9 10 11	L. Guarini - 111 that? A. At one point I was making \$5,000 a month. At no time did it ever get, really, that much higher. \$7,500 right near the end. They were going to be starting to pay me \$10,000 a month. 431. Q. So this \$100,000 bonus that's referred to in tab 27, is that part of that compensation or is it a bonus to A. No, it's part of that compensation. 432. Q. Okay. A. It's not a bonus to anything. From	1 2 3 4 5 6 7 8 9 10 11	L. Guarini - 113 then, the next thing that Dixit says in the September 18th, 2013 e-mail is: "The total of the amounts we discussed is \$148,000" And then he says: "Minus \$32,000 I already sent to you" Do you see that? A. M'hmm. 441. Q. And do you know what he's referring to there? A. No. I don't rememberthat, I	
12 13 14 15 16 17 18 19 20 21 22 23 24 25	 the work that I did, from the beginning and starting small and thenI was travelling all over the place. And I was helping build this company. So, they started to compensate me more and more, when I would bring it up. Because I deserved it. 433. Q. Right. A. And I felt I was grossly, grossly underpaid for what I was doing for this company at that time. 434. Q. And then the next line in this e-mail says: "\$30,000 three months' pay to you" What is your understanding of what he meant there? A. Well, when he sent me thisif I'm 	12 13 14 15 16 17 18 19 20 21 22 23 24 25	 don't remember. 442. Q. And he says: "Minus \$20,000 I transferred to Kelly's numbered company for TVs that never showed up" A. M'hmm. 443. Q. Do you know what he is referring to there? A. Yes. 444. Q. Okay, tell me about that. A. Okay, my wife and Ithere was a guy that had done our kitchen. And his friend was dealing in clothing like this and televisions and all kinds of stuff, and they could get all these TVs 	

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Sheet 30 Page 114	Page 116
L. Guarini - 114 for pennies on the dollar type-thing, so no problem, it was a good idea if they could deliver type-thing, okay? Well, they had us convinced and so we were supposed getbuy a bunch of TVs, get them all done, get them delivered and then we could sell them at a profit. 445. Q. You and who, you and Kelly? A. Well, yes. Kelly was going to do, what do you call it? Buying and selling. So these were supposed to be in the States, the televisions. The other things like this and the iPhone covers, there was all kinds of stuff like that was supposed to be from China. So this guy had been a trader in China in Guangzhou. So Kelly had told Raj this. I told Raj that Kelly was talking to this guy and he's going to go to China and guy a bunch of things. Whereas Kelly had talked to this very same guy and said, "Why don't I go to China together, because he had been doing this for a long, long time. And so when I told Raj about this, Raj gets the businessman idea thing and wants to get involved. And so what had happened was he now wanted to talk to Kelly and says to Kelly, "Look, you know what, I'll send you to	L. Guarini - 116 tell you about, basically, what that's about. 449. Q. Okay. So, apart from Kelly and Dixit, who else was involved in this venture to China, was it just Kelly and Dixit? A. Yes. 450. Q. Okay. A. No other parties, until Chris. Now, Chris could be an outside third party. I will explain to you. 451. Q. Yes, well, explain that now. Is it possible that Chris was involved? A. Chris did buy the rest of the Dr. Dre. When Kelly went there, she had ordered these Dre. They got delivered, some were stopped in the States. And I wish we would have saved the paperwork, because they wanted that we pay some kind of fine or whatever and they would release the goods or something like that. I don't understand any of that stuff, never got involved. But it was something like that, to that tune. Now, when these Dre Beats go there, they went to the Stellar Pointinside the building. In the back and they were stacked and all that other stuff. And so he's saying that they were counterfeit. Well, how do we know they are
Page 115 L. Guarini - 115 China. I'll get you set up here. I'll set you up a corporation." They called it Bazinga. And he sent her to China, which I didn't like, because she was by herself. She went to China and set met up with the one guy that she knows, one of his guys. 446. Q. In Guangzhou? A. In Guangzhou. She went to Hong Kong and then went to Guangzhou. So, she went there to search for what he wanted, and that was the Dr. Dre Beats. 447. Q. Right, headsets. A. Headsets andthere was other things, there was cell phones 448. Q. Right. A. that you could use, you could put two different chips or whatever, one chip for one number, one chip for another. It was a state-of- he-art thing. There was a bunch of other stuff. And Kelly used that money and did what she	Page 117 L. Guarini - 117 1 counterfeit. We don't know. Kelly didn't know. I 2 meanyou know, you are sending my wife to China, 3 for crying out loud. She has never done anything 4 like that before and so whether they were real or 5 whether they were counterfeit he took them anyway. 6 452. Q. Yes. 7 A. Now, they tried to do their set up 8 with their penny auction thing and whatever and made 9 sales and did whatever they did. Then that didn't 10 roll over too well. Whatever was left, Chris, if 11 I'm not mistaken, Chris bought the rest of it. What 12 A. Yes. 13 453. Q. Okay. So, just going back to the 14 Dixit e-mail to yourself 15 A. Yes. 16 454. Qabout the settlement agreement. 17 A. Yes. 18 a total of 20 and then another 25, call it \$45,000 20 out of the \$148,000? 21 A. Yes. 22 456. Q. Is that what he was proposing to do?

			•	66
1	L. Guarini - 118 is ready and will be sent to you as per the	1	L. Guarini - 120 did that and I know why he cc'd Chris Smith.	
2 3 4 5	attached agreement" A. Yes. 458. Q. So what was your reaction to that proposal?	2 3 4 5	467. Q. Why? A. He did that, and he cc'd Chris Smith to make Chris Smith see this and make Chris Smith think that I'm talking had about Chris Smith also	
6 7 8	A. Absolutely not. My reaction, honestand I know I'm being recorded, my reaction was to be the typical, any human being would do, go	6 7 8	think that I'm talking bad about Chris Smith also, to get me, basically, removed. Well, it didn't matter, I didn't care. 468. Q. Okay.	
9 10 11	over there and try and break his leg, okay, because he stole my money. And now he's trying to make a deal with me on my money and make me make some type	9	A. The monies that I earned were monies that I earned. I didn't deserve that, period.	
12 13	of agreement on my money. And the Dre, the other things, had nothing to do with me. 459. Q. Right.	12 13 14	 469. Q. So that's September the 18th. A. Yes. 470. Q. And when was the next contact that you had with Dixit after September the 18th? 	
14 15 16 17	A. They had nothing to do with me. My son's money had nothing to do with me, but he was dangling all that, as a carrot. And my son didn't	15 16 17	A. I don't know. There wasI'm sure we spoke after that, because I 471. Q. I know that you bumped into him	
18 19	 do anything to anybody. 460. Q. So is that what he's saying in the next paragraph when he says, "You sat in my basement 	18 19 20	about three weeks ago, right? A. Yes. I went to return 472. Q. The pictures?	
20 21 22 23	and told me you didn't want to fight, that you just wanted your money"? A. Yes.	21 22 23	 472. A. Yes. 473. Q. Okay, so between that time and the time in his basement, what was the nature of your 	
24 25	461. Q. So you went to his house and you had	24 25	Contact with Dixit? A. Between the time that we were in the Page 121	
4	L. Guarini - 119		L. Guarini - 121	7
23	A. Yes, I did. And told him, "Look, I don't want to argue. I don't want to fight. I just want my money and I want to be done with this,	1 2 3	basement and 474. Q. So it's like a year-and-a-half, right?	
45	period." 462. Q. And what did he say?	45	A. Yes. I didn't have a lot of contact.	
6 7 8	A. He said, "Yes, no problem, it's not going to happen overnight, but, yes, no problem. I will give you your money but you have got to give me	6 7 8	475. Q. Okay, and you weren't working at all for Banners Broker or Stellar Point during this period.	
9 10 11	some time." 463. Q. So you never signed the settlement	9 10 11	A. No, I was done. 476. Q. Okay, and did you follow up with him from time to time to find about your \$148,000?	
12 13 14	A. Absolutely not. 464. Q. And you told him you would never	12 13 14	A. I don't recall. I know that the bitternessI had a lot of bitterness. I tried to stay away so I wouldn't lose my temper and cool.	
15 16 17	A. I told him afterwards, "I'm not signing. I won't sign it", because I knew I was	15 16 17	But I was more concerned that if I tried to go after my money, then some people said, "Well, you're probably going to have to go offshore and take him	
18 19	465. Q. And did he ever pay you any of the \$148,000 that we see on the first page? No?	18 19 20	to court offshore, because the account is offshore." So that kind of dejected me a little bit. 477. Q. Right.	
20 21 22 23	466. Q. No, okay. Anything more that we should discuss about this e-mail? He says something	21 22 23	A. Because I can't afford a lawyer. It's justand I am trying to move on with my life. 478. Q. Okay, now, you had mentioned earlier	
24 25	A. You know what, he's full of crap,	24 25	this afternoon that you met with the police about Banners Broker?	

	Sheet 32 Page 122		Page 124
	L. Guarini - 122		L. Guarini - 124
1	A. Oh, yes.	1	Pay, PayzaI think it was something different. I
2	479. Q. So, when was that?	23	think it was called something different back then,
3	A. Let'sit was last year. I don't		at the time. I'm not sure if you could do bank
4	know if it was May, JuneApril, May, June.	4	wireI think you could do bank wire. That's to
5	480. Q. Okay, but you gave an interview?	5	join. To withdraw, I think you could also do bank
6	A. Oh, yes.	6	wire, if I am not mistaken.
7	481. Q. And have you met with them since?	7	486. Q. But was this all automated or were
8	A. No, but I spent a good time with	8	approvals required of Chris Smith or somebody?
9	them.	9	A. For withdrawals?
10	482. Q. I just want to talk a bit more about	10	487. Q. For payouts, withdrawals,
11	Banners Broker's business.	11	whatever
12	A. Okay.	12	A. Payouts. No, I think it would have
13	483. Q. Did youI mean, at some point	13	to be approved. Chris went through all the
14 15	earlier on, you had an understanding of what	14	approvals.
10	wasor did you have an understanding of what was	15	488. Q. Isee.
16 17	being sold? Like, how would you describe Banners	116	A. Most of the work he did was to do
18	Broker to myself, for instance, if I am an affiliate		approvals and payouts.
19	in Ireland or Canada and I am thinking of putting	18	489. Q. Okay, and do people know that? Was
20	some money into Banners Broker?	19	thatin the presentations that were made around
20	A. Well, it's been so long. But,	20	the world, was this explained to people, that Chris
21	Banners Broker was like an advertising exchange,	21	Smith would have to authorize payouts?
22	where you could go and purchase advertising. It	22	A. I don't think so. But, you know,
20	showed you your advertising in the form of a panel	23	Chris did go to some places, but he didn't go
21 22 23 24 25	and how much advertising was being done on that panel. When that panel was finished you earned an	24	everywhere. And so it really wasn't known that much.
20	Page 123		
	L. Guarini - 123		Page 125
1			L. Guarini - 125
1	amount of money, dependent on the colour of the	1	490. Q. How much did people earn? Do you
1 2 3	amount of money, dependent on the colour of the panel.	1 2 3	490. Q. How much did people earn? Do you have some sense from the work that you did for
3	amount of money, dependent on the colour of the panel. The yellow was 10, andI can't remember	1 2 3 4	490. Q. How much did people earn? Do you have some sense from the work that you did for Banners in terms of how much people could earn, the
3	amount of money, dependent on the colour of the panel. The yellow was 10, andI can't remember all the numbers, the purple was 20, we'll just say,	4	490. Q. How much did people earn? Do you have some sense from the work that you did for Banners in terms of how much people could earn, the really successful guys?
3 4 5	amount of money, dependent on the colour of the panel. The yellow was 10, andI can't remember all the numbers, the purple was 20, we'll just say, and then there was blue and green and what have you.	45	490. Q. How much did people earn? Do you have some sense from the work that you did for Banners in terms of how much people could earn, the really successful guys? A. Geez, man.
3 4 5 6	amount of money, dependent on the colour of the panel. The yellow was 10, andI can't remember all the numbers, the purple was 20, we'll just say, and then there was blue and green and what have you. But basically, what you could do was advertise your	456	 490. Q. How much did people earn? Do you have some sense from the work that you did for Banners in terms of how much people could earn, the really successful guys? A. Geez, man. 491. Q. And who were the real successful
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 amount of money, dependent on the colour of the panel. The yellow was 10, andI can't remember all the numbers, the purple was 20, we'll just say, and then there was blue and green and what have you. But basically, what you could do was advertise your business, any business. If you were part of another network marketing company, it didn't matter. And you could advertise or have a piece of advertisement on there, is how I understood it. And you could earn income from advertisement that was shown there, although it was on a blind network. The company, for all the advertising, would get paid from these advertisers and then share the revenue with the folks there. 484. Q. So, people would register and set up an account, presumably, that was the first part of it? A. Yes. 485. Q. Then when they wanted to make a withdrawal from their account, how would that happen? A. Well, there was different ways that 	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23	 490. Q. How much did people earn? Do you have some sense from the work that you did for Banners in terms of how much people could earn, the really successful guys? A. Geez, man. 491. Q. And who were the real successful guys? You must have met some of them, right? Can you give us their names? Because this is of interest to the Receiver. The top guys, the guys that A. You mean, Ian Driscoll? 492. Qreally made a killing. Maybe he is an example, but I need, like, the top 10, if you could A. Ian Driscoll, Simon Stepsys 493. Q. Maybe just give me the name and the country, or the name and the city. A. City, ISimon Stepsys, U.K., I don't know the city. 494. Q. Okay, that's fine. A. You know, I just have to think. But I know lan Driscoll was massive. Ian Driscoll was massive. He was also U.K. A lot of the big money

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Sheet 33 Page 126	- Page 128
L. Guarini - 126 a lot of money, a husband and wife team. Oh, God, it would come to me. 495. Q. Okay, but did theyand these people that made the most money, were they the ICs or country leaders? What was theirhow were they described within your organization? A. No. Simon wasn't an IC. The couple out of Ireland weren't ICs. Some of the ICs, yes, were, you know, like Ian. I mean, he was getting paid as an IC, and he's \$50,000 a month. 496. Q. In commissions? A. No, that's not commission. 497. Q. In what? A. That's not included in commissions. That \$50,000 a month was to open up an office, get some support staff, run the U.K. 498. Q. But that changed when Stellar Point took over the worldwide free selling, didn't it? A. Yes, but that wasn't until near the end. 499. Q. Okay. 2 499. Q. Okay. 3 500. Q. Can you think of any of the other	L. Guarini - 128 basically, you're here, it's like a tier. 507. Q. Right. A. And so you sponsor me, I've sponsored her, and she sponsors her and that's 508. Q. But I thought Banners Broker was selling mostly product, right, they were banners and stuff that were being brokered. A. Yes. 509. Q. So where's the sponsorship aspect to it? A. Well, the sponsorship aspect, basicallyif I showed you the business, okay, I would gain from it by the more you made, I would make from that. 510. Q. In terms of a commission? A. Yes. 511. Q. And the commission, was it virtual money in an account or was it actually A. No, virtual. 512. Q. It was virtual, okay. And for the work that you did, did you accrue commissions at all? You did? A. Right at the very beginning. I put in \$6,500 and basically, you know, I talked to a
25 really successful affiliates? Paul McCarthy, is	25 couple people in Ottawa, got started, and I made L. Guarini - 129 1 \$360 in commissions and that was it, something like 2 that, around 360 bucks. 3 513. Q. You had mentioned that at the 4 beginning. 5 A. Yes. 6 514. Q. That's right. 7 A. But, yes, there were downlines, 8 basically organizations. And massive for lan 9 Driscoll, massive. 10 515. Q. And when you say "massive", what do 11 you mean? Just give us an idea of the magnitude. 12 A. Oh, tens of thousands of people 13 underneath him. And like I said, he got \$50,000 a 14 month when they started this IC thing, whatever it 15 was. And then on top of itthat's not including 16 the amounts of money he was making in his account, 17 from going and doing presentations and meetings and 20 back to the payouts, and you met with affiliates 21 who, perhaps, had complaints about getting their 22 A. Yes, from time to time. But for the

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	Sheet 34 Page 130		Page 132
	L. Guarini - 130		L. Guarini - 132
1	took their issue back to the company. I could go	11 1	
			A. My credit card.
2	and say, "Hey, this guy was not paid. There's a	2	528. Q. Okay, your personal credit card?
3	screw up."	3	A. Yes.
4	517. Q. And then would they get paid? Like	4	529. Q. And so Smith would occasionally put
5	you would go to Chris?	5	money on that?
6	A. Yes.	6	A. Yes.
7	518. Q. Would you go to Chris or Dixit to		
8			
0	have them paid?	8	A. Yes?
9	A. No, Chris.	9	531. Qwas he involved with Banners
10	519. Q. Chris, okay. And I suppose in a lot	10	Broker as well?
11	of cases they just left the virtual money in their	11	A. Not really, no. He worked
12	accounts and it just grew, they didn't want to make	12	forsorry, Hiller (phon.). You know, I know he
13	withdrawals, is that fair?	13	needed work, so they gave him work and he worked for
14	A. A lot of people took their money	14	them, hourly wage.
15	out, but, I mean, yes, people would grow their	15	
16	virtual accounts and make even more meney vee		
110	virtual accounts and make even more money, yes.	16	part-time, was it
17	520. Q. Do you know anything aboutor did	17	A. No, full-time. Yes, full-time.
18	you, at the time when you were working, about where	18	533. Q. And he was working at the Whitby
19	Banners Broker or Stellar Point did their banking?	19	premises?
20	A. No. And that's where, I kind of	20	' A. Yes.
21	wish I did, but no. I don't know where they did	21	534. Q. Okay, and what was he doing there?
22	their banking. I know, later on, I know that, I	22	What was the nature of his job?
23	kept hearing Belize. I don't know if they did	23	A At first he started he hear
20 21 22 23 24	hapking in Baliza I really den't know		A. At first he startedhe became
25	banking in Belize. I really don't know.	24	one of the support and it was before the Whitby
20	521. Q. And did you have any dealings with	25	premises. There was a place, and I can't remember
	. Page 131	r	Page 133
	L. Guarini - 131		L. Guarini - 133
1	payment processors that the company used?	1	the street it was. It was in Oshawa. It was a
2	A. No.	2	shack of a shack. I can't remember the name of the
23	522. Q. No?	23	street, but it was a little office in Oshawa. And
4	A. No, like I never didI know Stella		
5	at SolidTrust Pay, but I never did anylike, I	4	then that's where they did the support from. Then
6	al Obid Husti ay, but hevel did allylike, i		they moved to this place in Whitby, right. And then
	said, I had no power, no dealings, nolike, I	6	they moved to the Stellar Point in Whitby.
7	didn't set nothing up or have any dealings with	7	535. Q. And did you brother leave around the
8	banks.	8	same time you did, or before, or after?
9	523. Q. Okay, you didn't have any signing	9	A. No, he left after I did.
10	authority?	10	536. Q. Okay, now, a couple other things. I
11	A. Oh, no.	11	will just throw out some names. Michael Kraemer and
12	524. Q. Did you have an expense account? Or	12	World eWallet? Are you familiar with either of
13	justhow did you pay your expenses when you	13	those names?
14	travelled?	14	
15			A. I had nothing to do with them.
10	A. Well, you know, sometimes he would	15	537. Q. You don't recall ever meeting or
16	put money on my card. Sometimes he would put money	16	hearing of a Michael Kraemer?
17	on another card, which was	17	A. No, he came after me.
18	525. Q. Was it a Vector card?	18	538. Q. What about GQ Media?
19	A. Yes, thank you.	19	A. GQ Media, I know now.
20	526. Q. Okav.	120	539. Q. Right
20	526. Q. Okay.	20	539. Q. Right. A It was Chris Smith's cousin-in-
20	526. Q. Okay. A. And he would just put money on the	21	A. It was Chris Smith's cousin-in-
20 21 22	526. Q. Okay. A. And he would just put money on the card and say, "Zo, just pay your expenses."	21 22	A. It was Chris Smith's cousin-in- law
20 21 22 23	526. Q. Okay. A. And he would just put money on the card and say, "Zo, just pay your expenses." 527. Q. So there was a Vector card. You	21 22 23	A. It was Chris Smith's cousin-in- law 540. Q. Yes.
20 21 22	526. Q. Okay. A. And he would just put money on the card and say, "Zo, just pay your expenses."	21 22	A. It was Chris Smith's cousin-in- law

.81	Sheet 35 Page 134		Page 136	3
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 15 16 17 8 9 20 21 22 23 24 25	L. Guarini - 134 A. Peter, yes. Nice guy. 542. Q. So you met Peter? A. Yes. 543. Q. Did you meet him here or in the States? A. Both. 544. Q. And now was Peter Williams the guy that you met back when you went to Florida? A. Yes. 545. Q. And what was the purposes of the Florida visit? A. There wasn't anything talked about orI mean, he just came because he was coming to see the presentation. 546. Q. All right. A. And was supposed toif I am not mistaken, was going to be in charge of taking over the Florida meetings or presentations or whatever, from what I knew back then. 547. Q. So you met him in Florida. A. Yes. 548. Q. Did you meet him in Canada, as well? A. Yes, here in Toronto. 549. Q. What was the context there? A. Well, he was coming up to visit	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\3\\24\\25\end{array}$	L. Guarini - 136 today you had mentionedyou had hinted that perhaps there was a story about lan Driscoll that you could share with us in terms of something that he did or A. Well, the \$50,000 a month was to let you know that he was probably the highest paid IC, not only the \$50,000 a month in which he was spending probably less than \$3,000 a month and pocketing the \$47,000. I also found that out from other people in the U.K. 559. Q. Okay. A. Secondly, him and Lyndon Farrington, his so-called "best buddy"remember, that people would always talk to me and tell me anything and everything that they know. So I would always try and keep my ears open. I knowand I am actually in contact with this guy once in a while, his name is Chris Cronin. 560. Q. His last name with a "C" Cronin? A. Yes, Cronin, C-R-O-N-I-N. 561. Q. Okay. A. Chris Cronin and his wife had bought black packages. I can't remember the exact amount of money, how much a black was. But him and his wife both bought a black package each. And what was	
1 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 14 5 16 7 8 9 10 11 23 11 2 11 2 11 2 11 2 11 2 11 2	Page 135 L. Guarini - 135 Chris, that's all. 550. Q. Did you have an understanding of what GQ Media did in relation to the Banners Broker business? A. No. 551. Q. Maxwell Morgan; have you ever heard of that name? A. That's a friend of Rajiv Dixit. 552. Q. Okay, have you met Max Morgan? A. Once, yes. 553. Q. Just tell me about that meeting. A. Just 554. Q. Was it in relation to Banners Broker? A. No. He was at the Christmas party that Raj had had and it was just, "Max, this is Lorenzo, Lorenzo, this is Max." 555. S55. Q. Okay. A. So not business-related. 556. Q. No? A. No. 557. Q. No? A. I know that they were close friends. 558. Q. Sorry, Erin reminds me that earlier	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 20 21 22 3 24 25	Page 137 L. Guarini - 137 happening with Mr. Farrington and his partner, was that Farrington would go and say, "Well, I'll take care of your accounts. I'll make the accounts grow for 10 percent or 15 percent of what you put in." So what they would do is, these people would go and pay them, Lyndon and Ian, the money. And then Ian would buy their positions and take 10 percent of that money out, immediately, and put it in their pockets. Instead of growing the account, and then taking 10 percent, they took 10 percent right off the top, in cash. Chris Cronin was not the only people that this happened to. I brought this to the company's attention and said, "These guys needed to be out. They are taking cash", and it wasn't the only time. Now, what they were doing also was manipulating panels andas an example, instead of you paying me, because my company is selling this food, okay. You now have access to panels, to everything in the back office. They would go and give people panels and sell them for cash. They made quite a lot of money, and there's a lot of people right nowthat's why I kind of chuckled when I saw this report, the Spergel, that the very guy who's trying to take BB to court was one of the	

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	Sheet 36 Page 138		Page 140
	L. Guarini - 138		L. Guarini - 140
1	biggest culprits of all.	1	A. It's not on the phone. It's a
2	And I was, like, "Really?", if only they	2	little thing, I open it up and it's like a little
3	knew this guy. Same with Kul. "Oh, yes, you know	3	calculator.
45	what they bought me out with a car." "Yes, okay." And the millions in cash. Now, if I could find	45	570. MR. WARD: Just off the record.
6	the bank, I promise you I would do everything in	6	A BRIEF RECESS
7	my power. Because what these guys did, and		A BRIEF RECESS
8	perpetrated, they deserve to go down.	8	LORENZO GUARINI, resumed
9	562. Q. If you could find the Banners	9	CONTINUED EXAMINATION BY MR. WARD:
10	Broker's bank, you mean?	10	571. Q. Okay, so we are back on the record
11	A. Oh, anyman, I'd do anything.	11	and I think, during the break, we established that
12	563. Q. Okaý, so justI mean, going back	12	there would be an RSA token that, presumably, you
13 14	to something we discussed earlier today, do you have	13	have at home, Lorenzo?
15	any records or e-mails at home or in an account somewhere that you might be able to find for us that	14	A. I'm sure of it. 572. Q. Okay, so the Receiver is interested
16	would relate to some of these issues?	16	in having a look, if possible, at the account. And
17	A. Anything that I can find, I promise	17	we would appreciate your undertaking to help us
18 19	you, you will have it.	18	access it.
19	564. Q. But what sorts of things might you	19	A. Sure. U/T
20	have that we could make a list and provide to you?	20	573. Q. Thank you for that. And we will
21 22	A. The one thing I'm praying that I	21	just be in contact with you and propose a convenient
22	could still open that up, is the bank, the offshore bank.	22	way for that to happen.
24	565. Q. Right.	23	A. Okay. I mean, I could come in and bring it with me, and we just
25	A. If I can find anythingbut I	25	574. Q. I think that would be
	Page 139		Page 141
	L. Guarini - 139		L. Guarini - 141
1	didn't	1	Ago online somewhere and you guys
23	566. Q. Do you still have a password for	2	can
4	that offshore bank or something that we wouldI mean, we could try it right now.	3	575. Q. Well, see if it works, terrific,
5	A. No, because it's an electronic. I		okay. Thank you for that undertaking. A. No problem.
6	got to have it. It's an electronic thing, and so in		
		116	576. MR. WARD: So let's just take a break
7		6	576. MR. WARD: So let's just take a break
8	order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to		576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up.
8 9	order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and	7 8 9	576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up.
8 9 10	order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and say, "Okay, I want to log in", and then I got to put	7 8 9 10	576. MR. WARD: So let's just take a break again, for five minutes and then were are
8 9 10 11	order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and say, "Okay, I want to log in", and then I got to put in mycertain numbers, okay, and then it will tell	7 8 9 10 11	 576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up. A BRIEF RECESS
8 9 10 11 12	order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and say, "Okay, I want to log in", and then I got to put in mycertain numbers, okay, and then it will tell me and then I fill in those numbers.	7 8 9 10 11 12	 576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up. A BRIEF RECESS LORENZO GUARINI, resumed
8 9 10 11 12 13	order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and say, "Okay, I want to log in", and then I got to put in mycertain numbers, okay, and then it will tell me and then I fill in those numbers. 567. Q. But what is the "it", is it like a	7 8 9 10 11 12 13	 576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up. A BRIEF RECESS LORENZO GUARINI, resumed CONTINUED EXAMINATION BY MR. WARD:
8 9 10 11 12 13 14	order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and say, "Okay, I want to log in", and then I got to put in mycertain numbers, okay, and then it will tell me and then I fill in those numbers. 567. Q. But what is the "it", is it like a password generator?	7 8 9 10 11 12 13 14	 576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up. A BRIEF RECESS LORENZO GUARINI, resumed CONTINUED EXAMINATION BY MR. WARD: 577. Q. I wanted to clarify or confirm that
8 9 10 11 12 13 14 15 16	order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and say, "Okay, I want to log in", and then I got to put in mycertain numbers, okay, and then it will tell me and then I fill in those numbers. 567. Q. But what is the "it", is it like a	7 8 9 10 11 12 13 14 15 16	 576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up. A BRIEF RECESS LORENZO GUARINI, resumed CONTINUED EXAMINATION BY MR. WARD: 577. Q. I wanted to clarify or confirm that the financial institution in Cyprus that you had the
8 9 10 11 12 13 14 15 16 17	 order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and say, "Okay, I want to log in", and then I got to put in mycertain numbers, okay, and then it will tell me and then I fill in those numbers. 567. Q. But what is the "it", is it like a password generator? A. No, it's an electronic 	7 8 9 10 11 12 13 14 15 16 17	 576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up. A BRIEF RECESS LORENZO GUARINI, resumed CONTINUED EXAMINATION BY MR. WARD: 577. Q. I wanted to clarify or confirm that the financial institution in Cyprus that you had the joint bank account with Rajiv Dixit was called 1bank.
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8 9 10 11 12 13 14 15 16 17 18 19 20 21	 order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and say, "Okay, I want to log in", and then I got to put in mycertain numbers, okay, and then it will tell me and then I fill in those numbers. 567. Q. But what is the "it", is it like a password generator? A. No, it's an electronic MR. HORKINS: It's a token, right? MS. CRADDOCK: It's an RSA token? BY MR. WARD: 568. Q. Is it like a little token or key fob that generates passwords? 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up. A BRIEF RECESS LORENZO GUARINI, resumed CONTINUED EXAMINATION BY MR. WARD: 577. Q. I wanted to clarify or confirm that the financial institution in Cyprus that you had the joint bank account with Rajiv Dixit was called 1bank. A. Yes, 1bank. 578. Q. Okay, thank you. So the Receiver has had access to some financial records of, for instance, Stellar Point.
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8 9 10 11 12 13 14 15 16 17 18 19 20	 order for me to log on, if we were here, I could log on, as an example, but the problem is I have got to have the account number and then I have to try and say, "Okay, I want to log in", and then I got to put in mycertain numbers, okay, and then it will tell me and then I fill in those numbers. 567. Q. But what is the "it", is it like a password generator? A. No, it's an electronic MR. HORKINS: It's a token, right? MS. CRADDOCK: It's an RSA token? BY MR. WARD: 568. Q. Is it like a little token or key fob that generates passwords? 	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 576. MR. WARD: So let's just take a break again, for five minutes and then were are going to wrap up. A BRIEF RECESS LORENZO GUARINI, resumed CONTINUED EXAMINATION BY MR. WARD: 577. Q. I wanted to clarify or confirm that the financial institution in Cyprus that you had the joint bank account with Rajiv Dixit was called 1bank. A. Yes, 1bank. 578. Q. Okay, thank you. So the Receiver has had access to some financial records of, for instance, Stellar Point.

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	Sheet 37 Page 142 L. Guarini - 142	1	Page 144
			L. Guarini - 144
	the top, it appears that there wasthe Stellar		587. Q. I mean, we know he's involved in
2	Point general ledger indicates that on December 31,	2	other companies, but this looks likethat the sole
3	2012, there was \$35,000 transferred to an account	3	director was Kelly Stinson.
4	ending with "TBB", that's in the name of 8136645	4	A. Okay. If that's her corporation
5	Canada Limited. Now, I thinkwell, I know that	5	number, then that would be her corporation not
6	8136645 Canada Limited is a company that has Kelly	6	
7	Stingen on a director. And the information is in		Rajiv's corporation with her on title.
1	Stinson as a director. And the information is in		588. Q. Okay, so if you could just maybe
8	that book that you have in front of you.	8	keep your finger at tab 9
9	A. M'hmm.	9	A. Yes.
10	580. Q. I won'tlet me just finish the	10	589. Qand flip forward to tab 12 of the
11	question, I won't take you there unless we need to	11	same binder.
12	go there, but this 8136645 Canada Limited, and we	12	A. Okay, yes.
13	will just call it "813" from here on in.	13	590. Q. It looks like two pages into the
14	A. Okay.	14	production.
15		15	
10		0110	A. Okay.
16	8th, 2012. And so my question for you, if you have	16	591. Q. I don't think you are at tab 12 yet.
17	any information on it is, do you know why Stellar	17	It's the next one.
18	Point, Rajiv's company, would have paid \$35,000 to a	18	A. Oh, I'm sorry.
19	company in which your wife is the sole director on	19	592. Q. So, flip that page.
20	December 31, 2012?	20	A. Yes, okay.
21	A. No.	21	593. Q. This is a share certificate.
21 22 23	582. Q. So, have a lookwhat I have just	21 22	A. Yes.
23	given you, set that down for a second, Lorenzo, and	23	
21	bayo a look as well at tab 0 of the hinder	24	
24 25	have a look, as well, at tab 9 of the binder.		registered holder of 150 shares of Stellar Point
23	A. Okay.	25	Inc., which is Dixit's company.
	Page 143		Page 145
	L. Guarini - 143		L. Guarini - 145
1	583. Q. Tab 9 is a copy of some Industry	1	A. Yes.
2	Canada Corporation Profile Report for the 813	2	595. Q. So, did this suggest to the Receiver
3	Company.	23	that Kelly was a shareholder through her company in
	A. M'hmm.	4	Stellar Point?
45	584. Q. And at the bottom of the page, on	5	A. Yes.
6	the left, it says that Kelly Stinson, 637 Merlin	6	596. Q. Were you aware of that?
7	Court Ochawa Ontaria is the director 627 Marlin	7	
	Court, Oshawa, Ontario, is the director. 637 Merlin	1	A. Yes. He was giving her shares in
8	Court, is that your wife's address?	8	the company, apparently, but we never really did
9	A. Yes.	9	anything with it, took part in it, I guess, because
10	585. Q. Have you heard of this company	10	he was going to help her form this Bazinga company
11	before? I mean, there are documents in this book	11	that she was going to set up. But these shares were
12	that she signed as well, that Kelly signed.	12	nothing really.
13	A. Yes, honestly, guys, you know	13	597. Q. Well, whose idea was it that Kelly
14		14	set up an 813 Company and receive shares in Rajiv's
117	what? This duy, from what I know had, this is		
15	what? This guy, from what I know, hadthis is probably one of who knows 20 30 50 I don't	15	
15	probably one of, who knows, 20, 30, 50, I don't	15	company?
15 16	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from	15 16	company? A. She set up the company to set up
15 16 17	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from Kelly to his mother to his dog to whoever are	15 16 17	company? A. She set up the company to set up Bazinga, so she could do this buying stuff from
15 16 17 18	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from Kelly to his mother to his dog to whoever are allalways a director or whatever. I don't know	15 16 17 18	company? A. She set up the company to set up Bazinga, so she could do this buying stuff from China and all that other stuff. That's what I know.
15 16 17 18 19	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from Kelly to his mother to his dog to whoever are allalways a director or whatever. I don't know if that's a requirement. I don't know. I know he	15 16 17 18 19	company? A. She set up the company to set up Bazinga, so she could do this buying stuff from China and all that other stuff. That's what I know. 598. Q. Okay.
15 16 17 18 19	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from Kelly to his mother to his dog to whoever are allalways a director or whatever. I don't know if that's a requirement. I don't know. I know he had corporations, I just don't know which	15 16 17 18 19 20	Company? A. She set up the company to set up Bazinga, so she could do this buying stuff from China and all that other stuff. That's what I know. 598. Q. Okay. A. We didn't even know of these shares,
15 16 17 18 19	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from Kelly to his mother to his dog to whoever are allalways a director or whatever. I don't know if that's a requirement. I don't know. I know he had corporations, I just don't know which	15 16 17 18 19 20 21	Company? A. She set up the company to set up Bazinga, so she could do this buying stuff from China and all that other stuff. That's what I know. 598. Q. Okay. A. We didn't even know of these shares,
15 16 17 18 19 20 21 22	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from Kelly to his mother to his dog to whoever are allalways a director or whatever. I don't know if that's a requirement. I don't know. I know he had corporations, I just don't know which corporation this one is and why Kelly is a director.	15 16 17 18 19 20 21	Company? A. She set up the company to set up Bazinga, so she could do this buying stuff from China and all that other stuff. That's what I know. 598. Q. Okay. A. We didn't even know of these shares, to be honest with you, not
15 16 17 18 19 20 21 22	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from Kelly to his mother to his dog to whoever are allalways a director or whatever. I don't know if that's a requirement. I don't know. I know he had corporations, I just don't know which corporation this one is and why Kelly is a director. 586. Q. Well, there is no indicationwe	15 16 17 18 19 20 21 22	company?A.She set up the company to set upBazinga, so she could do this buying stuff fromChina and all that other stuff. That's what I know.598.Q.Okay.A.We didn't even know of these shares,to be honest with you, not599.Q.And can I have you, as well, next,
15 16 17 18 19 20 21 22 23	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from Kelly to his mother to his dog to whoever are allalways a director or whatever. I don't know if that's a requirement. I don't know. I know he had corporations, I just don't know which corporation this one is and why Kelly is a director. 586. Q. Well, there is no indicationwe haven't found any indication that Rajiv is involved	15 16 17 18 19 20 21 22 23	company?A.She set up the company to set upBazinga, so she could do this buying stuff fromChina and all that other stuff. That's what I know.598.Q.Okay.A.We didn't even know of these shares,to be honest with you, not599.Q.And can I have you, as well, next,to look at tab 16 of the binder?
15 16 17 18 19 20 21 22	probably one of, who knows, 20, 30, 50, I don't know, corporations that he had and there's from Kelly to his mother to his dog to whoever are allalways a director or whatever. I don't know if that's a requirement. I don't know. I know he had corporations, I just don't know which corporation this one is and why Kelly is a director. 586. Q. Well, there is no indicationwe	15 16 17 18 19 20 21 22	company?A.She set up the company to set upBazinga, so she could do this buying stuff fromChina and all that other stuff. That's what I know.598.Q.Okay.A.We didn't even know of these shares,to be honest with you, not599.Q.And can I have you, as well, next,

	. Sheet 38 Page 146		- 67	'6
$\begin{array}{c}1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\8\\9\\20\\21\\22\\3\\24\\25\end{array}$	L. Guarini - 146 it's in there and it may be difficult to see. A. Okay. 601. Q. This is a resolution of the shareholders of Rajiv Dixit's company. A. Yes. 602. Q. I think maybe you have that. You do. And do you recognize that signature on the right as your wife's signature? A. Yes, I do. 603. Q. And that's a resolution with respect to a name change of a numbered company to Banners Broker Limited. Do you have any explanation as to why she would have signed that document? A. You know what? Honestly, Raj would tell us, "Yes, you know what, you need to come in here and sign this, sign that. I need a director, I need somebody to sign." And he would constantly that's what I'm telling you, like, I don't know from one thing to the next, I really don't. I don't even know what a resolution to a shareholder thing is. You know, we kind of trusted that he's doing the right things out there and doing whatever. 604. Q. But you say Raj would do that. Presumably, I mean, Raj didn't contact Kelly directly did he? Would he deal with her directly?	$\begin{array}{c}1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\2\\13\\14\\15\\16\\7\\8\\19\\20\\22\\23\\24\\25\end{array}$	L. Guarini - 148 So, I can put these questions to Kelly, but I want to know if you have any information or explanation as to those payments. A. I really don't. I mean, you know, I don'tI can't explain them because I don't remember. I don't know. I can't answer because I really don'tyou know, so much has happened and it's been quite a while. You know, what I do remember, I remember. I'm here to tell you what I know and what I don't know, I don't know. 608. Q. And then to finish off with the same sheet, the Stellar Point general ledger for the following year, as at December 31, 2013, indicates that a Kelly S. was paid \$42,000 for subcontracted services on January 31, 2013. Do you see that? A. Yes. 609. Q. Do you have any information or explanation as to why a Stellar Point general ledger would indicate that? A. I don't know if that was to purchaseI'm wondering if that was to purchase the TVs andI can't tell you. I'm not 100 percent sure. 610. Q. Okay, and then the next bullet, the	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 20 21 22 23 24 25	directly, did he? Would he deal with her directly? Page 147 L. Guarini - 147 A. Oh, yes. She went into the office one day and his lawyers were sitting there. It wasn't long after he wasn't so happy and basically said to herI don't know, he insulted her one way or another. And basically said, "Look, you know what? You are not a business person. So I'm just going to take over Bazinga and if there's any monies that are made, I will give you a little bit of profit." Basically, "Just sign it over." His lawyer was there, whatever. She didn't care, she just signed it over. If he asked her to do something, she did it. Just us beingI'm going to claim ignorance in not understanding, that's all. 605. Q. Okay, so then have a look back at the loose sheet that I passed across the table, Lorenzo, on your left. A. Yes. 606. Q. So the top three bullet points, they show \$35,000 in December of 2012, \$4,000 in November of 2012 and another \$3,600 also in November of 2012 A. M'hmm. 607. Qbeing paid to, in the first case, the 813 Company. And in the second two cases, Kelly	25 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	last bullet item on the same page is the \$75,000 Page 149 L. Guarini - 149 shareholder loan that's recorded in the Stellar Point general ledger as of December 31, 2013 for Lorenzo. A. Yes, and where did that go to? 611. Q. Did you receive a \$75,000 loan or payment from Stellar Point? A. No. No, I'm just even surprised to even see that. 612. Q. So how were you paid? I mean, I know we talked about what you were paid, right, and I know it wasn't documented in the employment agreement. But how were you paid? A. My monies were to be going in that offshore account. So my pay was supposed to go into the offshore account. A lot of it went to the card, that was to cover my expenses, plus some of my pay on the Vector card. 613. Q. Right, but the money in the offshore account you never got, because he took it back, right? A. Yes. 614. Q. So you must have been paid something apart from your expenses, when you were working. A. Well, some of my pay would go on the	

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ړ	Sheet 39 Page 150		Page 152
	L. Guarini - 150		L. Guarini - 152
1	615. Q. Okay.	1	624. Q. And so the first one across the top
2	A. But my pay would also go on there.	2	is dated November 12th, 2013.
3	616. Q. Did some of your pay go to Kelly or	3	A. Yes.
4	813 Company as these records indicate?	4	625. Q. It's an outgoing wire transfer to
5	A. I don't think so, no. I don't think	5	AngelFire Ventures Limited?
6 7	so. I don't believe so, no.	6 7	A. Yes.
/ 8	617. MR. WARD: Okay, so let's mark this		626. Q. Do you know anything about that
9 9	as"this" being the loose single page	8 9	company?
9	document entitled "Documents from Mary Febbrini" as Exhibit 1 on the examination.	10	A. Yes, that's one of the companies that Iit's not a company, it's basically the
1		11	offshore account that I put myself. And that wire
2	EXHIBIT NO. 1: Loose single-page document entitled	12	went into my account, that \$10,000, that was
3	"Documents from Mary Febbrini"	13	627. Q. The joint account?
4		14	A. No, that's not the joint account.
5	THE DEPONENT: I'm interested in that	15	Because that joint account, he stole all my money.
6	\$75,000 shareholder loan. I'm curious.	16	So at that time, I got that money sent into that
7	618. MR. WARD: Just off the record for a	17	account, into AngelFire. I started another account.
8	Sec.	18	628. Q. Where?
9		19	A. The same place, the same bank.
0	DISCUSSION OFF THE RECORD	20	629. Q. 1bank.
1		21	A. Yes.
2 3	619. MR. WARD: And we will mark the special	22	630. Q. In
3	resolution of the shareholders of 7250037	23	A. Cyprus.
4	Canada Inc. as Exhibit 2 on the	24	631. QCyprus. And did you have any
5	examination.	25	other accounts at the 1bank in Cyprus?
	Page 151		Page 153
1	L. Guarini - 151 EXHIBIT NO. 2: Special Resolution of the	1	L. Guarini - 153 A. No.
2	shareholders of 7250037 Canada	2	632. Q. So you just had the joint account
3	Inc.	3	with Dixit?
4		4	A. Yes.
5	620. MR. WARD: And just one more, so that	5	633. Q. And then
6	we have it referenced. And the Industry	6	A. And AngelFire.
7	Canada Corporation Profile Report for	7	634. Q. It says "AngelFire Ventures
8	8136645 Company is Exhibit 3 on the	8	Limited".
9	examination.	9	A. Yes.
0		10	635. Q. So that sounds to me like a company
1	EXHIBIT NO. 3: Industry Canada Corporation Profile	11	name. Did somebody set up a company for you?
2	Report for 8136645 Company	12	A. Yes. You know, I guess you are
3		13	supposed to do it in a company.
	BY MR. WARD:	14	636. Q. Okay, who arranged for that to
4		15	happen?
4 5	621. Q. And then, Lorenzo, I think there was		
4 5 6	just one more thing before we close out.	16	A. Dixitif I can find it, I will
4 5 6 7	just one more thing before we close out. A. Sure, okay.	16 17	give you the guy's name, if he's in here.
4 5 6 7 8	just one more thing before we close out. A. Sure, okay. 622. Q. So, I have just passed across the	16 17 18	give you the guy's name, if he's in here. 637. Q. Okay.
4 5 6 7 8 9	just one more thing before we close out. A. Sure, okay. 622. Q. So, I have just passed across the table an e-mail that has some transaction details in	16 17 18 19	give you the guy's name, if he ^r s in here. 637. Q. Okay. A. If not, I will find his name and I
4 5 6 7 8 9 0	just one more thing before we close out. A. Sure, okay. 622. Q. So, I have just passed across the table an e-mail that has some transaction details in respect of what I understand are monies that were	16 17 18 19 20	give you the guy's name, if he's in here. 637. Q. Okay. A. If not, I will find his name and I will make sure you guys get it also.
4 5 6 7 8 9 0 1	just one more thing before we close out. A. Sure, okay. 622. Q. So, I have just passed across the table an e-mail that has some transaction details in respect of what I understand are monies that were wired from Via Bank in St. Lucia.	16 17 18 19 20 21	give you the guy's name, if he's in here. 637. Q. Okay. A. If not, I will find his name and I will make sure you guys get it also. 638. Q. Okay. Just take your time.
456789012	just one more thing before we close out. A. Sure, okay. 622. Q. So, I have just passed across the table an e-mail that has some transaction details in respect of what I understand are monies that were wired from Via Bank in St. Lucia. A. In St. Lucia?	16 17 18 19 20 21 22	give you the guy's name, if he's in here. 637. Q. Okay. A. If not, I will find his name and I will make sure you guys get it also. 638. Q. Okay. Just take your time. A. Thank you. George. His name is
4 5 6 7 8 9 0	just one more thing before we close out. A. Sure, okay. 622. Q. So, I have just passed across the table an e-mail that has some transaction details in respect of what I understand are monies that were wired from Via Bank in St. Lucia.	16 17 18 19 20 21	give you the guy's name, if he's in here. 637. Q. Okay. A. If not, I will find his name and I will make sure you guys get it also. 638. Q. Okay. Just take your time.

Sheet 40Page 154Page 1541A. He's here, yes.1related to the work that you di2640.Q. Okay, and you don't know his last1related to the work that you di3name?4A. No.4A. No.656.Q. Okay, so then co5641.Q. No. How were you introduced? How56did you come to know George?6Limited is account at 1bank?7A. Rajiv Dixit.7A. Sure.8642.Q. Sure, if you have got his phone8	yes. buld we, for Erin's
2640.Q.Okay, and you don't know his last2A.For the most part,3name?3656.Q.Okay, so then co4A.No.1Ist of undertakings, get an un5641.Q.No.How56did you come to know George?6Limited is account at 1bank?7A.Rajiv Dixit.7A.	id for Banners Broker? yes. puld we, for Erin's
2640.Q.Okay, and you don't know his last2A.For the most part,3name?3656.Q.Okay, so then co4A.No.1Iist of undertakings, get an un5641.Q.No.How56did you come to know George?6Limited is account at 1bank?7A.Rajiv Dixit.7A.	yes. buld we, for Erin's
3name?3656.Q.Okay, so then co4A.No.4list of undertakings, get an un5641.Q.No.5account statements in respect6did you come to know George?6Limited is account at 1bank?7A.Rajiv Dixit.7A.	ould we, for Erin's
4A. No.4list of undertakings, get an un5641.Q. No. How were you introduced? How5account statements in respec6did you come to know George?6Limited is account at 1bank?7A. Rajiv Dixit.7A. Sure.	
5641.Q.No. How were you introduced? How5account statements in respec6did you come to know George?6Limited is account at 1bank?7A.Rajiv Dixit.7A.	dertaking to get
6did you come to know George?6Limited is account at 1bank?7A. Rajiv Dixit.7A. Sure.	
7 A. Rajiv Dixit. 7 A. Sure.	i of Angeli lie Ventures
	LL/T
	U/T
9 number, we will take it. 9 contact 1 bank directly to ask t	
10 A. Of course. 10 statements or the joint statem	
11 643. Q. What is it? 11 account that you had with Dix	it, could we get your
12 A. Ready? 12 authorization and consent as	
13 644. Q. Yes. 13 A. Absolutely.	U/T
14 A. Okay, mobile 1-416-897-0400, and the 14658. Q. Okay, thanks. A	nd so then there
15 next phone number is 1-416-479-4437. [15 were just three more transaction of the second se	ons that I want to ask
16 645. Q. Okay, any other phone numbers or [16 you about.	
17 contact information? [17 A. Okay.	
18 A. No, that's all I have. 18 659. Q. The next one is a	dated December 6th.
19 646. Q. So just let's talk about AngelFire 19 2013. And it's a \$29,658.15 ti	ransfer from Via Bank
20 Ventures for a minute then.	
21 A. Yes. [21 any explanation or information	as to why Ranners
22 647. Q. Why did George and Dixit and 22 Broker is account at Via Bank	would transfer that
23 yourself set up an AngelFire Ventures account at the 23 money to 813 Company?	would transfer that
24 1bank? [24 A. That, I'm not sure.	Lam not curo
25 A. So I could have my own, separate [25 660. Q. And then the nex	
Page 155 Page 157 Page 157	L Querini 407
	L. Guarini - 157
	m via Bank to Kelly
	. Do you nave any
3 account for the purposes of presumably being paid by 3 information or explanation as	to why that money
4 Mr. Dixit and his company?	
5 A. Well, no, I wasn't being paid by 5 A. I don't know, I am g	going to have to
6 Dixit, I was being paid by Chris. 6 guess. Possibly, tobecause	
7 649. Q. By Chris? 7 Keep her account anymore an	
8 A. Yes. 8 affiliate. I am just guessing, o	
9 650. Q. Right, okay. So how much money went 19 661. Q. Okay, well, don't.	
10 into that account?	
11 A. I can't tell you until I check. 11 A. And then I can't an	swer it,
12 651. Q. Okay, so you still have that 12 becausebetween the televis	ions, the China
13 account? [13 dealthe televisions and ever	
A. Yes. It's pretty well dead now,	, ,
15 there's no money left in it, but I can still find 15 662. Q. Right.	
16 out. 16 A. In Pennsylvania, S	So there were
17 652. Q. Okay. And how much money went 17 funds that were sent to Kelly to	
18 through that account? [18 okay. It's been a nightmare, o	
19 A. Through AngelFire? [19 lost the money on the televisio	n And we even have
21 A. I can't tell you until I look.	
22 654. Q. Okay, but the AngelFire was related [22 supposed to get and everythin]	
22 654. Q. Okay, but the AngelFire was related 22 supposed to get and everythin 23 to your work at Banners Broker? 23 you call ititinerary or	iy eise, iliewildi uu
20653.Q.Yes.20theif we get the chance, we21A.I can't tell you until I look.21we even have the list of all the22654.Q.Okay, but the AngelFire was related22supposed to get and everythin23to your work at Banners Broker?23you call ititinerary or2424A.Yes.24663.Q.Okay, if you coul25655.Q.The establishment of that account25would bewe would accept the	d cond that that
24 A. Yes. 24 663. Q. Okay, if you could be we would accept the stablishment of that account 25 655. Q. The establishment of that account 25 would be we would accept the stablishment of that account	
	iai as well.

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	Check 41 Dags 150		Dama 160
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 20 11 23 4 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 23 14 5 6 7 8 9 10 11 12 13 14 5 16 17 10 10 11 12 10 11 12 10 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 12 11 11	Sheet 41 Page 158 L. Guarini - 158 A. Yes, if you could write that down also. U/T 664. Q. All right. A. You know, I can't give you the exact, but there was soso much happening at the time between China and the televisions and everything for her. 665. Q. Okay. A. But I don't know what's what, do you know what I mean? 666. Q. Okay, well, then let'sone more question then I have a suggestion on how we can approach this. A. Okay. 667. Q. The next transaction that we have some details for is June 24, 2014. A. Yes. 668. Q. It's an outgoing wire transfer from Via Bank to the 813 Company for \$73,061.06, okay? A. M'hmm. 669. Q. And so again, 813 Company is Kelly's company? A. Yes. 670. Q. Do you have any information or explanation with respect to that transaction?	$ \begin{array}{c} 1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\3\\24\\25\end{array} $	Page 160 L. Guarini - 160 then let me just check my notes. I think that we are done. Lorenzo, were you compensated in any ways that we haven't discussed so far today by Chris Smith or Rajiv Dixit or Banners Broker or anyone connected with Banners Broker in terms ofwe have talked about your expenses and your income. A. Yes. 676. Q. But, for instance, were you given any gifts, any automobiles, anything like that? A. No. I was given one of the BB rings. 677. Q. Okay. A. I have a BB ring, which I couldn't care less for right now. 678. Q. Right. Were you given a Lexus SUV? A. No. No way. 680. Q. Were you ever paid in cash? A. Sometimes, yes. Yes, we will say paid in cash. But, I mean, yes, they gave me cash sometimes. 681. Q. And who's "they"? A. Well, Chris. 682. 682. Q. Did Dixit ever give you cash?
1 2 3 4 5 6 7 8 9 10 11 12 3 4 5 6 7 8 9 10 11 12 3 14 15 16 17 18 19 20 21 22 23 24 25	 L. Guarini - 159 A. No, but I think that was for all the rest of theDr. Dre and material or whatever, was left from the China deal that he had bought the rest of them. 671. Q. Okay. A. From what I gather. 672. Q. Okay, so here's what I would like to do then, with respect to Exhibit 1 and thiswell, Exhibit 1 we have over here and with respect to the four transactions on this note, Erin will send you an e-mail with the details of the transactions. And then could you undertake to think about it, check your records and provide us with your best accounting as to A. I'm brutal. I will try. 673. Q. Let me just finish for the purposes of the recordyour best accounting or your wife's best accounting or a combination of the two of you, your best accounting jointly, as to, first of all, why these monies were sent. A. Okay. A. Okay. G74. Q. And, secondly, what they were used for. A. Okay. G75. Q. Okay. great. Thanks for that. And 	$\begin{array}{c ccccccccccccccccccccccccccccccccccc$	 L. Guarini - 161 A. I think he did give me cash. I think he gave me \$1,000 cash. I can't give you the date. 683. Q. Okay, maybe once Dixit? A. Yes. 684. Q. Right. And then Chris, how frequently would Chris pay you in cash? A. Infrequently. But I'd say on more thanfive to ten occasions. 685. Q. And what sort of amounts are we talking about? A. Anywhere between \$500 and \$5,000. 686. Q. And why was he paying you that much in cash? A. He had the cash on him. I just told him to just put it on my card. 687. Q. Right. A. And he said, "Here, I'll just give you the cash." He gave me the cash. 688. Q. Was this payment for services or was it reimbursement of expenses? What was it? A. Both. Sometimes he would say, "Listen, you are going to Poland. Make sure you take those guys out", because they had just opened up the office or whatever. And he would say, "Here,

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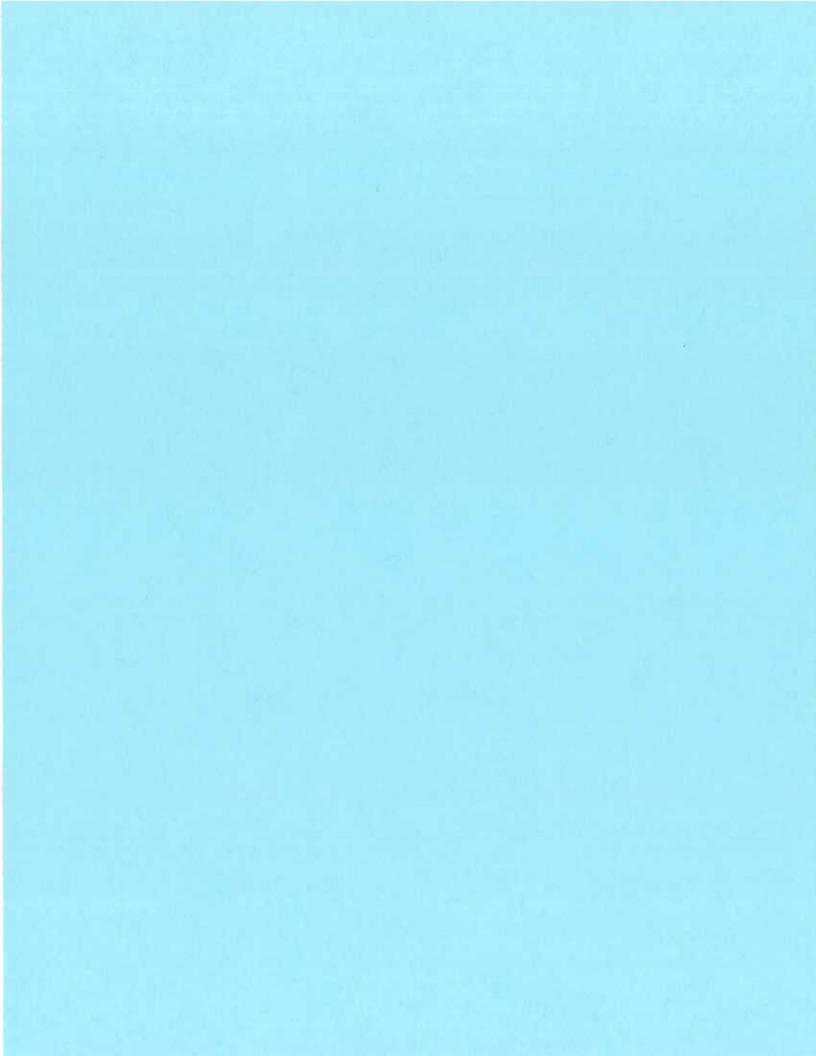
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1 2 3 4	L. Guarini - 162 just take the cash and buy Polish money", or whatever it's called. And I'd be doing there to take these people out. 689. Q. And were there any other reasons,	1 2 2	.Page 164	INDEX OF UNDERTA		arini - 164
4 5 6 7	any other explanations for being paid in cash or having money come through these companies that you can think of?	3 4 5 6	REFERENC NUMBER	CE PAGE NUMBER	QUES NUMB	
8	A. Not really.	8	1.	51	193	
9 10	690. Q. And we will give you an opportunity to speak to the specific transactions with respect	9	2.	57	219	
11 12	to the companies. A. Sure, Yes.	11	3.	61	226	
13 14	691. MR. WARD: So, let's break there. We are going to go off the record again. We	13	4.	140	572	
15	will adjourn for today.	15 16 17	5.	156	656	
		18	6.	156	657	
		20	7.	158	663	
		22 23	8.	159	673	
1	Page 163 L. Guarini - 163	1 2	Page 165			L. Guari
23		1 2 3 4 5	REP	PORTER'S NOTE:		
4 5 6 7 8 9	EXHIBIT PAGE NUMBER DESCRIPTION NUMBER 1. Loose single-page document 150 entitled "Documents from	5 6 7 8 9	l advis their nece	Please be advised that isements and refusals r guidance only, and c essarily accurate and	are provided as	a service to all c
10	Mary Febbrini"	11 12	nepi	orting Services Inc.		
11 12 13 14 15 16 17	2. Special Resolution of the 151 shareholders of 7250037 Canada Inc.	13 14 15 16 17 18	trans 21ST	I hereby certify the fo scription of the above T DAY OF APRIL, 2019 ty and understanding	-noted proceedir 5, and taken to th	igs held before me
18 19 20 21	3. Industry Canada Corporation 151 Profile Report for 8136645 Company	19 20 21 22 23 24 25	asin	}	ified Correct:	
		25 26 27 28 29 30			ta Balilaj vatim Reporter	

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ONTARIO SUPERIOR COURT OF JUSTICE (Commercial List)

AB/Im

IN THE MATTER OF THE BANKRUPTCY AND INSOLVENCY ACT, R.S.C. 1992, c.27, s.2, AS AMENDED AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE ISLE OF MAN WITH RESPECT TO BANNERS BROKER INTERNATIONAL LIMITED APPLICATION OF MILES ANDREW BENHAM AND PAUL ROBERT APPLETON, IN THEIR CAPACITY AS JOINT LIQUIDATORS OF BANNERS BROKER INTERNATIONAL LIMITED, UNDER PART XIII OF THE BANKRUPTCY AND INSOLVENCY ACT (CROSS-BORDER INSOLVENCIES)

This is the Examination of KELLY STINSON, pursuant to Section 163 of the Bankruptcy and Insolvency Act, taken at the offices of CASSELS BROCK & BLACKWELL LLP, Suite 2100, Scotia Plaza, 40 King Street West, Toronto, Ontario, on the 21st day of April, 2015.

A P P E A R A N C E S: DAVID S. WARD } -- for the Receiver ERIN CRADDOCK } CHRISTOPHER HORKINS }

ALSO PRESENT: Gillian Goldblatt Philip H. Gennis

				- 682
	Sheet 2 Page 2		Page	4
	K. Stinson - 2	1 2 3 4 5 6 7	7.	time. A. Okay, so, the first time I heard that would be Raj brought it to Lorenzo, in my
	INDEX OF PROCEEDINGS	7 8 9 10 11 12		recollection, okay. An online business, you know and they were just starting. So I have been in networking since I was 15, with Amway, with my parents. So it's not adverse to us to do network marketing. And you wouldn't set me loose on the network marketing.
	PAGE NUMBER KELLY STINSON, affirmed	13 14 15 16		So I knew Raj before that, though. That was the time when Lorenzo put the bond on the house, when the Banners started to come in. And I never
	Examination by Mr. Ward 3 - 65 Index of Exhibits 63	17 17 18 19		trusted Raj. I'm not a fan of Raj's. So probably what I am going to tell you about him is my boldest with no sugar-coating on this guy, because I really feel he's a pathological liar and I have caught him
1	Index of Undertakings 64 Certificate 65	20 21 22	8.	in many lies. I am going tocan I jump a bit? Q. Yes, by all means.
		23 24 25		A. Okay, I guess that first Christmas we went over there. I was never a fan of his, I always felt distant, but for some reason Lorenzo felt sorry for him. Lorenzo has got a big heart and
	Page 3 K. Stinson - 3 1 KELLY STINSON, affirmed 2 EXAMINATION BY MR. WARD: 3 1. Q. Kelly, as a follow-up to Lorenzo's 4 examination, we have some questions relating not 5 just to Banners Broker, but to a company called 6 Stellar Point. 7 A. Yes. 8 2. Q. And to a company called Dixit 9 Holdings Inc. that you may have heard of. 10 A. M'hmm. 11 3. Q. And finally to a company that we 12 believe that you were involved in, a numbered 13 company, by the name of 8136645 Canada 14 A. Yes, that's mine. 15 4. Q. Okay, and we will just call that 16 "813 Company" when we get to it. 17 A. Yes. 18 5. Q. But first of all and very generally, 1 justI want to give you an opportunity to 20 describe for us your involvement, if any, with 21 Mr. Dixit, Mr. Smith, Mr. Josun and the Banners 22 Broker business 23	1 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23 24 25	9. 10.	K. Stinson - 5 we are not here to talk about Lorenzo but I have his back. And I was in the background watching a lot of this happen. So I am only going to give you my eyes to what is happening. We were over at his house and he saidthis is when he was really getting into it with Chris Smith and really bonding, I think he started seeing money coming in. Anyhow, he said something like this, "Well, you know, I'm the boss, I can hire and fire anybody, including Lorenzo." And Lorenzo didn't hear that. And I was like, he was still bonded with Lorenzo, with that house. Q. Yes. A. Poor Lorenzo, and our family suffered with this guy. Lorenzo had to go everywhere with him. He went to anger management classes, Lorenzo had to take him. Or Lorenzo had to watch his kids. He was hooked with him. And then when he got a little bit friendly with Glenroyyou know Glenroy? Q. Yes. A. You have got that name, okay. He was living with us.

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Sheet 3 Page 6	Page 8
K. Stinson - 6 house arrest, right? 2 12. Q. Right. 3 A. For his charges of child assault. 4 13. Q. Right. 5 A. And we finally got himGlenroy 6 went on it, but our house was up on the block. I 7 went behind Lorenzo with it and I said, "Okay, I 8 wasn't happy with it." I never trusted the guy. 9 Anyhow, then I met Chris Smith and lovely guy, 10 wonderful guy, I have absolutely nothing personally 11 to say wrong about the guy. Never did me any harm, 12 my family harm, as far as personal. Nice guy. 13 His business dealings, that's a whole 14 different world. So my assessment of Chris 15 Smithfirst of all, my assessment of Raj, 16 pathological liar. He will throw his mother under 17 the bus, he will throw everybody under the bus. You 18 can't believe a word this guy says. He makes all 19 kinds of deals with the devil. And I never trusted 20 the guy. So I don't know if I am making it very 21 clear, I don't like the guy. 22 Chris, I can't say that. Very charismatic, 23 very nice guy. Had a great idea, everybody is on 24 it starting forward. Great idea, everybody is on 25 board. Kul, we'll go to Kul for a second. Met him	 K. Stinson - 8 A. In the beginning, when it all started, Lorenzo was an affiliate, I was an affiliate, my dad, you know, the family. Just like you would sponsor into Amway and all the networking, that's how we started. 22. Q. Okay, and how did you do as an affiliate? A. I did pretty good. Not the greatest, but I would see my account here and there and I would see some money in the account and then I would see it disappear. There was Lorenzo giving money to some affiliates who needed help. Remember, Lorenzo, he travelled the world. We were okay, financially. So when you go into these other worlds and I'm looking at my account and I go, "Where did that money go?" "I helped a few people over here and there." And if you want a list of the people he helped, he can more than give it to you. I don't know who. I will tell you when we were in Portugal, there was a couple, Lorenzo can give you the name if you want to take that note, and he was just pulling money out of his account to help them. These people went there 23. Q. Who, Lorenzo was? A. Yes.
Page 7K. Stinson - 71a few times. One at the old office they had on2Nelson Road in Oshawa. Charming guy. That's all I3have on him.414.Q. Okay.5A. Never had any, really, dealings with6any of them.715.Q. Okay, well, what about Banners8Broker, starting from the top, did you personally9ever work for Chris Smith?10A. No.1116.Q. Or Rajiv Dixit?12A. No.1317.Q. Or Banners Broker?14A. No.1518.Q. Or Stellar Point?16A. None. Not in any capacity.1719.Q. Did you ever have an investment18account? Were you ever an affiliate?19A. No. Oh, yes, I was an affiliate20Q. Okay.21Q. Okay, tell me about that. Tell me2321.Q. Okay, tell me about that. Tell me24about when you became an affiliate?25ceased to be an affiliate?	Page 9 K. Stinson - 9 1 24. Q. But when you say "his account" we 2 are talking about your account, right? 3 A. Well, yes, but he didn't have an 4 account after that. It was mine. He would transfer 5 my panels, which is kind of money and give it to 6 them. 7 25. Q. Because Lorenzo, he had to give 8 up 9 A. Yes, he did. 10 26. Qhis panel trading account, when 11 he became the global brand ambassador? 12 A. Yes, but he still had access to 13 mine. 14 27. Q. I see. 15 A. We live together, we are married, 16 right? So it wasn't that I was taking any money, 17 per se, out, a couple thousand here and there, 18 Q. And whose name was your account in? 20 A. Yes. 21 29. Q. Your name personally? 22 A. Yes. 23 30. Q. Kelly Stinson? 24 A. Yes. 25 31. Q. And was that account open until the

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	Shee	t 4 Page 10 K. Stinson - 10		Page	12 _	1/ 04/10000 40
						K. Stinson - 12
1		end, until Banners Broker shut down?]			A. That was at Christmastime. And I
2		A. Yes, but I think because when	2		think I	that was a bait to get him to go, because they
3		Chriswhen something happened with the system, my	3		were	all on holidays. There is no way I would have
4		account went into the negative, so I didn't even			lot hin	n, no way.
		beve on monory. If you didn't do comothing at the	4	10		
5		have any money. If you didn't do something at the	0	43.		Q. Right, okay.
6		timeI can't remember the exactif you weren't	6			A. But I turned that into, "All right,
7		buying your panels or doing whatever, you owed	7		all rig	ht, at least we get time together." And one
8		Banners. So what happened is a lot of these	8		other	time I went with him was, he was representing
9		accounts went into the negative.	9		Ranne	ers at Claudia's wedding in Portugal. So that's
10		And my son had an account, then he had to	10		three.	
				4.4		
11		give that up because he went with Lorenzo on the	11	44.		QSo to Portugal twice?
12		road.	12			A. Twice.
13	32.	Q. Right, but just your account, when	13	45.		Q. And who is Claudia?
14		did you wind that up? When did it end?	14			A. Claudia was an IC in Portugal.
15		A. It's probably still open. I didn't	15	46.		Q. So it was basically three trips in
16		evenwhen it went into the negative, I didn't even	16	101	total?	a. Ou it was basidally three thps in
17		bother, how's that? Is that	17			
	00			47		A. Yes.
18	33.	Q. No, that's helpful.	18	47.		Q. Okay, so apart from your account
19		A. Okay.	19			A. M'hmm.
20	34.	Q. And then when it was in the	20	48.		Qand the three trips, did you have
21		positive, just give me some general idea as to the	21		anv of	ther points of contact with Banners Broker?
22		positive, just give me some general idea as to the balances in your account. How big would it get?	22		Like (did you do anything for them? Any consulting
23		Virtual dollars, presumably, we are talking about,	23			es or anything like that?
24		right?	24			A. No.
25		A. That I received out of there or	25	10		
			20	49.		Q. Now, there waswe know a bit about
	Page	11				
	2 age			Page	13	
	-	K. Stinson - 11		Page		K. Stinson - 13
1	35.	K. Stinson - 11 Q. No, just that were registered.	1	Page	Bazing	K. Stinson - 13
1 2	35.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000.	1	Page		K. Stinson - 13
1	-	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you	1		Bazinę	ga A. Yes.
1 2	35.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you	1	Page 50.	Bazinę	K. Stinson - 13 ga A. Yes. Qand a trip to China that you had.
1 2 3 4	35.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you received out of there, do you recall?	1		Bazin	ga A. Yes.
1 2 3 4 5	35.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you received out of there, do you recall? A. I couldn't recall. You could	1 2 3 4 5	50.	Bazing , one?	K. Stinson - 13 A. Yes. Qand a trip to China that you had. A. Yes, do you want me to explain that
1 2 3 4 5 6	35.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you received out of there, do you recall? A. I couldn't recall. You could probably check if you wanted, STP over three years,	1 2 3 4 5 6		Bazino , one?	K. Stinson - 13 ga A. Yes. Qand a trip to China that you had. A. Yes, do you want me to explain that Q. I think so.
1 2 3 4 5 6 7	35. 36.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you received out of there, do you recall? A. I couldn't recall. You could probably check if you wanted, STP over three years, I would say, let's go \$12,000.	1 2 3 4 5 6 7	50. 51.	Bazino , one?	K. Stinson - 13 A. Yes. Qand a trip to China that you had. A. Yes, do you want me to explain that Q. I think so. A. Okay.
1 2 3 4 5 6 7 8	35.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you received out of there, do you recall? A. I couldn't recall. You could probably check if you wanted, STP over three years, I would say, let's go \$12,000. Q. Okay, but STP was the payment	1 2 3 4 5 6 7 8	50.	Bazing one?	K. Stinson - 13 ga A. Yes. Qand a trip to China that you had. A. Yes, do you want me to explain that Q. I think so. A. Okay. Q. You went to China, was it just once?
1 2 3 4 5 6 7 8 9	35. 36.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you received out of there, do you recall? A. I couldn't recall. You could probably check if you wanted, STP over three years, I would say, let's go \$12,000. Q. Okay, but STP was the payment processor that you used for withdrawals?	1 2 3 4 5 6 7 8 9	50. 51. 52.	Bazing one?	K. Stinson - 13 ga A. Yes. Qand a trip to China that you had. A. Yes, do you want me to explain that Q. I think so. A. Okay. Q. You went to China, was it just once? A. Yes.
1 2 3 4 5 6 7 8 9 10	35. 36. 37.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you received out of there, do you recall? A. I couldn't recall. You could probably check if you wanted, STP over three years, I would say, let's go \$12,000. Q. Okay, but STP was the payment processor that you used for withdrawals? A. Yes.	1 2 3 4 5 6 7 8 9 10	50. 51.	Bazing one?	K. Stinson - 13 ga A. Yes. Qand a trip to China that you had. A. Yes, do you want me to explain that Q. I think so. A. Okay. Q. You went to China, was it just once? A. Yes.
1 2 3 4 5 6 7 8 9 10 11	35. 36.	K. Stinson - 11 Q. No, just that were registered. A. That were registered, about \$30,000. Q. And the second part that you received out of there, do you recall? A. I couldn't recall. You could probably check if you wanted, STP over three years, I would say, let's go \$12,000. Q. Okay, but STP was the payment processor that you used for withdrawals? A. Yes.	1 2 3 4 5 6 7 8 9	50. 51. 52.	Bazing one?	K. Stinson - 13 ga A. Yes. Qand a trip to China that you had. A. Yes, do you want me to explain that Q. I think so. A. Okay. Q. You went to China, was it just once? A. Yes.
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	Shee	t 5 Page 14		Page	16
	2	K. Stinson - 14		. aye	K. Stinson - 16
1		had done this import/export for four to six years.	1		were there?
2		I thought, "I'd like to do that." So I got in	2		A. I would say at least \$30,000.
3		contact. He was back home. He said, "Okay, we can	3	66.	Q. Okay, and how did you pay for what
4		make a trip to China." I told Raj about it. Raj	4	00.	you bought?
5		says, "Okay. I'll pay for you to go and this is the	5		A. Wired money.
6		kind of stuff I want." So, I said, "Okay, we'll go		67.	
		there."	6 7	07.	
					A. Fromokay, first of all, when I
8		I went on my own, which was, I think	8		was there, I was just looking. Then he wanted me to
9		looking back, a little crazy at that point. And I	9		buy. So then Lorenzo wired money to China for me.
10		was supposed to meet up with the one guy, he was a	10		I had to pick it up at Western Union.
11		week late, so I ended up staying there longer than I	11	68.	Q. Okay, and do you know where Lorenzo
12		should have. Landed in Hong Kong. And had to wait	12		got the money that he wired to China?
13		for this guy. So I was in Hong Kong for about five,	13		A. From Raj.
14		six days until this guy showed up. And then we went	14	69.	Q. Okay.
15		over to Guangzhou, that's when we started doing the	15		A. That was just a partial shipment.
16		buying, meeting different suppliers and whatnot.	16		You know, like to bring it home and show him. And
17		So, I did that. I ordered everything. And	17		that was in the Christmastime. And it took a little
18		then it was to be shipped back. That wasand I	18		
19		think I was there, I would like to say 15 days.			extra longer. And then he wanted a big supply of
20	57.	New did you de this an your own	19	70	it. Am I going too fast?
21	57.		20	70.	
		behalf	21		A. And then he wanted another shipment.
22	50	A. No.	22		So I ordered the other shipment, which was another
23	58.	Qor for Mr. Dixit?	23	-	big shipment.
24		A. Mr. Dixit. He paid for everything.	24	71.	
25		It was my Bazinga Company and he wanted a piece of	25		the second shipment was, dollars spent.
	Page			Page	17
		K. Stinson - 15			K. Stinson - 17
1		my Bazinga. So he was willing toas long as I do	1		A. Another \$35,000.
2		the work, he wants half. Well, that is not how it	2	72.	Q. Okay.
3		turns out.	3		A. Okay, and that was shipped to the
4	59.	Q. Bazinga, is that an actual company?	4		office in Whitby.
5		A. That was me, yes. That's my	5	73.	Q. Stellar Point's office?
6		numbered company.	6		A. Yes.
7	60.	Q. So 813 is Bazinga?	7	74.	Q. Okay.
8		A. Bazinga. That is how it started.	8	,	A. And that was for his penny site. I
9	61.	Q. Did you register Bazinga as a	9		was no longer, at that point, involved. He told me
10	••••	business name for 813?	10		I can't really do too much business as long as I
11		A. No, no.	11		just order. He'll take care of it and pay me.
12	62.	Q. Okay.	12	75.	D Pay you some of the profite from
13	VL.	A. He registered my company name. He	13		Q. Pay you some of the profits from
14		did it online for me right when we first started			the penny auction, okay. But the actual product
15		did it online for me, right, when we first started.	14		that you purchased, two shipments from China,
		And then we needed a name for the company, I came up	15		approximately \$35,000 each?
16		with "Bazinga". So when I came back and all the	16		A. The first one waslet me think
17	00	stuff was shipped and all that, I	17		in around there, yes. The first one was a little
18	63.		18		smaller amount. It was about \$15,000, the second
19		you buy?	19		one, I think, was \$30,000.
20		A. Dr. Dre's, short, shirts, some	20	76.	Q. Was there any more than \$45,000
21		phones, Samsung phones. Stuff forbecause he was	21		spent?
22		going to start his penny option.	22		A. No, not on that, no.
23	64.	Q. Dixit was?	23	77.	Q. Now, was there any more money spent
24		A. Yes, so	24		on other 813 Company things?
25	65.		25		
25	65.	Q. And how much did you spend when you	25		A. Yes. Okay, then we had a line on

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Shee		Page 20 // Okinaan 00
$ \begin{array}{cccccccccccccccccccccccccccccccccccc$	 A. Lorenzo and I. I take him with me. The China thing, going on my own, that was just too courageous. So, yes, it was too stupid. Anyhow, so apparently it may be still inthe guy that I deal with down there, first of all, he ended up in jail because it was one of thoseyes, all the trucks are thereby the truckload. And that was, again, for the penny stocks and TVs were supposed to come. Q. When was this? A. That wasI would have to give you an exact date. I do have the paper on the TVs. If you want, I can call that into you. U/T Q. Yes, we would. We will take that, please. Erin, maybe that as an undertaking. Kelly will give us documents relating to the 813 Company's, purchase of the TVs. A. Yes. 	K. Stinson - 20 for. He was the one I gave \$30,000 to start with the TVs that were in Pennsylvania. And that was wrote to Robertnot Schappell. That was out of my 81 account, so that's all there. I can't think of his last name right now, but when I have my phone, if you want to take that down, I will give you the last name of that one. We are still chasing him for that money. 86. Q. That's another \$30,000? A. Yes, oh, yes. All total for the TVs was about 80 grand, that we are out. 87. Q. And that was money that Chris Smithyou believe Chris Smith gave it to Raj who gave it to you, who gave it to the TV guys in The States? A. Yes. 88. Q. And you never got the TVs? A. I would say not yet. He is still says they are there, and it's been how long? Now, I talked to him, he got out of jail. Isn't this lovely people that we deal with. You think we are justI'm listening to myself talk and I'm thinking, I must live on the streets or something. Anyhow, he just got out of jail, when was it?
25 81.	Q. And this was supposed to be done	25 Because he
Page	19	Page 21
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 85. 21 23 24 25	 TVs? Like you went there for a visit, right? A. Yes, we did. Q. Where did you go? A. We went to Erie, Pennsylvania. They met us there, the guy that I was dealing with, Robertif I had my phone, I could give you his last nameSchappell. Robert Schappell, he ended up in jail. Q. Okay, so did you A. No, didn't see a thing. 	K. Stinson - 21189.Q. What is your understanding of where2there TVs are now?3A. My understanding is they are there.490.Q. In Erie, Pennsylvania?5A. Yes. And it's funny, because6Lorenzo said to me, "We need to take a trip down to7Erie." And in all honesty, we do have to go down8for closure. Are they there? Now, we talked to the991.Q. Okay.11A. When we heard things were going12sideways, Lorenzo and I made another trip down13there. We went to this guy's home, the cops had14already raided his home. I don't know what he was15into. We went to the police station, probably have16our names there. When we were trying to1792.Q. I'm sorry, when was this again, when18you went to see the police?19A. This was in the winter. This was20that's the following year, that would be November,21December.2293.Q. Of what year?23A. Let me look at my paperwork, the24year2594.Q. 2013?

	Sheet 7 Page 22	P	age 24
	K. Stinson - 22		K. Stinson - 24
1	A. Yes.	1	when you stopped in to see the paperwork at Raj's
2	95. Q. So it wasn't this past winter, it	2	office?
3	was the winter before?	3	A. Was it Gray?
4	A. No.	4	MR. HORKINS: David Gray?
5	96. Q. All right, sorry, go ahead.	5	THE DEPONENT: Yes.
6	A. Now, there are TVs, there's a whole	6	
7	litany of stuff, but there's a Canadian guy I was	7	BY MR. WARD:
8	dealing with thatthese TVs were supposed to come	8	105. Q. David Gray, okay.
10	in for Raj and Chris. So now we are a whole year	9 10	A. That's it. Thank you. 106. Q. So let's look at just a little bit
11	that they haven't even been here. But, like I just said, I have to go downbecause they say they are	11	
12	still there. The things that we ordered from them	12	of the paperwork. A. Sure.
13	and I have to see if they are.	13	107. Q. This is Exhibit 3 from Lorenzo's
14	If they are not then I have to follow-	14	examination and it's just an Industry Canada
15	through and try and sue them for whatever. And I	15	Corporation profile report for the 813 Company. And
16	don't think they have got anything. But I have to	16	just tell me again whose initiative was that set up?
17	do what is right.	17	A. Rai.
18	97. Q. Did Bazinga do anythingor the 813	18	108. Q. Ŕaj, okay, and it
19	Company, which is Bazinga, they are same company A. Yes.	19	A. I didn't even to it online, Raj did.
20		20	109. Q. And did he
21	98. Qdid they do any other business	21	A. This is mine, right, the 645?
22	ventures with Mr. Dixit?	22	110. Q. Can I see that for a sec?
23	A. No.	23	A. Yes, that'sI believe that's mine.
24 25	99. Q. Did they do any other business	24 25	111. Q. Well, that's the corporation
L	ventures with anybody else?		A. Yes.
	Page 23 K. Stinson - 23		age 25 K. Stinson - 25
1	A. My 813, I did \$5,000 with Sublime,	1	112. Qnumber, but the corporate name is
2	that's a cosmetic facelift, and that's it.	2	8136645.
3	100. Q. Okay.	3	A. Yes.
4	A. Pretty much after that, with Raj,	4	113. Q. So that is the name?
5	now Raj told me that, you know what, he'd take over	5	A. Yes.
6	everything, which is what Raj did. And after China	6	114. Q. Okay. But whoseI know Raj set it
7	and the way he acted and that, I didn't want to deal	7	up, but whose idea was it that he set up a numbered
8	with the guy.	8	company?
1 0	101. Q. When you say "take over everything",	9	A. Raj. I had never set up a numbered
9			· · ·
10	he gavehow did he take over everything?	10	company.
10	he gavehow did he take over everything? A. Bazinga.	11	115. Q. Why would Raj reach out to you to do
10 11 12	he gavehow did he take over everything? A. Bazinga. 102. Q. And how did he take over Bazinga?	11 12	115. Q. Why would Raj reach out to you to do that and not Lorenzo, because he was dealing with
10 11 12 13	he gavehow did he take over everything? A. Bazinga. 102. Q. And how did he take over Bazinga? A. I had a Bazinga website also. And	11 12 13	115. Q. Why would Raj reach out to you to do that and not Lorenzo, because he was dealing with Lorenzo on the Banners Broker side?
10 11 12 13 14	he gavehow did he take over everything? A. Bazinga. 102. Q. And how did he take over Bazinga? A. I had a Bazinga website also. And then he kind of shooed that aside and everything was	11 12 13 14	115. Q. Why would Raj reach out to you to do that and not Lorenzo, because he was dealing with Lorenzo on the Banners Broker side? A. Well, you are going to ask me what's
10 11 12 13 14 15	he gavehow did he take over everything? A. Bazinga. 102. Q. And how did he take over Bazinga? A. I had a Bazinga website also. And then he kind of shooed that aside and everything was going to his penny stock. It was going to start	11 12 13 14 15	115. Q. Why would Raj reach out to you to do that and not Lorenzo, because he was dealing with Lorenzo on the Banners Broker side? A. Well, you are going to ask me what's in his head? Raj, in my opinion, becausenow this
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Sheet 8Page 26K. Stinson - 261A. Okay.2117. Q. Now, you haveI am just going3to show you another document, which is a share4certificate in Stellar Point.5A. Yes.6118. Q. And it showsit seems to indicate7that the 813 Company was a shareholder of Stellar8Point. And how many sharesI have highlighted it9for you, how many sharesI have highlighted it9for you, how many shares is it, 150?10A. One-hundred-and-fifty.11119. Q. So why was your company taking 15012shares in Stellar Point?13A. You want the answer?14120. Q. Yes.15A. I have no idea.16121. Q. All right.17A. Does that help you?18122. Q. Well, it may.19A. Okay.10A. Okay.11122. Q. Well, it may.12Q. Let me show you one other document.13Q. Let me show you one other document.14122. Q. Key.15A. Okay.16123. Q. Let me show you one other document.17A. Okay.18126. Okay.20123. Q. Let me show you one other document.21This is Exhibit 2 from Lorenzo's examination.22A. Yes.23Q. Let me show you one other document.24A. Yes.25A. Yes.26127. Q. Okay.27128 <th></th>	
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22 A. Yes. II 22 and David Grav is thereso maybe this is going to	
23 124. Q. And it's a shareholders' resolution 23 clear things up. I was handed a bunch of papers to	
24 for Stellar Point. 24 sign. Not two, there was a bunch. And they were	
25 A. Yes. 25 put in front of me and I signed them. David Gray	
Page 27 Page 29 Page 29	
K. Stinson - 27 I 125 And as is that your signature on the	
1 125. Q. And so is that your signature on the doing a But I did as a and I don't know if your signature on the	
2 lower right? 3 A. Yes, that is. 2 doing. But I did see, and I don't know if you guys 3 have it, there was a piece of paper with "Raj Dixit	
4 126. Q. Okay, so how was it that you came to 5 sign a Stellar Point shareholders' resolution? 5 corporations under him.	
6 A. Okay, and what does that even mean? 6 So the only explanation, if I can remember, 7 127. Q. Well, it has to do with a name 7 at the time, Raj saying to me is, "Don't worry about	
8 change. 8 Bazinga, don't worry about that, it will all be 9 A. Okay. 9 taken care of." And that was brush out. His lawyer	
10 128 O So Stellar Point changed its name II 10 was there too. This was in their boardroom. And	
10 128. Q. So Stellar Point changed its name 10 was there too. This was in their boardroom. And that is my fault for not knowing what I was signing	
11 to Banners Broker and you are signing that and 11 that is my fault for not knowing what I was signing.	
11to Banners Broker and you are signing that and11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he wanted Bazinga or any of that. I didn't want	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he wanted Bazinga or any of that. I didn't want nothing to do with the guy, so I didn't pay total13A.Okay, so these documents were13wanted Bazinga or any of that. I didn't want nothing to do with the guy, so I didn't pay total	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he wanted Bazinga or any of that. I didn't want nothing to do with the guy, so I didn't pay total attention. Does that makes sense?	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he13A.Okay, so these documents were13wanted Bazinga or any of that. I didn't want14probably14nothing to do with the guy, so I didn't pay total15129.Q.Or Banners Broker changed its name1516to Stellar Point, rather.16138.Q.0Okay, well, it'sI certainly	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he13A.Okay, so these documents were13wanted Bazinga or any of that. I didn't want14probably14nothing to do with the guy, so I didn't pay total15129.Q.Or Banners Broker changed its name1516to Stellar Point, rather.16138.Q.17A.Was this signed the same day? When17understand what you are saying.18I went into the office, that time, to go and see18A.If that is	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he13A. Okay, so these documents were probably13wanted Bazinga or any of that. I didn't want nothing to do with the guy, so I didn't pay total attention. Does that makes sense?14probably14nothing to do with the guy, so I didn't pay total attention. Does that makes sense?16to Stellar Point, rather.16138.Q. Okay, well, it'sI certainly understand what you are saying.18I went into the office, that time, to go and see himno, they weren't signed the same day.18A. If that is19himno, they weren't signed the same day.19139.Q. Let's deal with this document.	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he13A.Okay, so these documents were13wanted Bazinga or any of that. I didn't want14probably14nothing to do with the guy, so I didn't pay total15129.Q.Or Banners Broker changed its name15attention. Does that makes sense?16to Stellar Point, rather.16138.Q.Okay, well, it'sI certainly17A.Was this signed the same day? When17understand what you are saying.18I went into the office, that time, to go and see18A.If that is19himno, they weren't signed the same day.19139.Q.Let's deal with this document.20130.Q.Let's have a look and we will just20A.Okay.	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he13A.Okay, so these documents were13wanted Bazinga or any of that. I didn't want14probably14nothing to do with the guy, so I didn't pay total15129.Q.Or Banners Broker changed its name15attention. Does that makes sense?16to Stellar Point, rather.16138.Q.Okay, well, it'sI certainly17A.Was this signed the same day? When17understand what you are saying.18I went into the office, that time, to go and see18A.If that is19himno, they weren't signed the same day.19139.Q.Let's deal with this document.20130.Q.Let's have a look and we will just20A.Okay.21clarify that for the record.21140.Q.Now, this isand just pass the	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.But at that time, I didn't care if he wanted Bazinga or any of that. I didn't want nothing to do with the guy, so I didn't pay total attention. Does that makes sense?14probably14nothing to do with the guy, so I didn't pay total attention. Does that makes sense?15129.Q. Or Banners Broker changed its name to Stellar Point, rather.16138.Q. Okay, well, it'sI certainly understand what you are saying.17A. Was this signed the same day? When 1818I went into the office, that time, to go and see himno, they weren't signed the same day.130.Q. Let's have a look and we will just clarify that for the record.130.Q. Let's have a look and we will just clarify that for the record.130.Q. Now, this isand just pass the one back to me. So I am passing you the share	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.12But at that time, I didn't care if he13A.Okay, so these documents were probably12But at that time, I didn't care if he14probably1314nothing to do with the guy, so I didn't want15129.Q.Or Banners Broker changed its name to Stellar Point, rather.14nothing to do with the guy, so I didn't pay total16to Stellar Point, rather.16138.Q.Okay, well, it'sI certainly17A.Was this signed the same day?16138.Q.Okay, well, it'sI certainly18I went into the office, that time, to go and see18A.If that is19139.Q.Let's deal with this document.20130.Q.Let's have a look and we will just20A.Okay.21140.Q.Now, this isand just pass the one back to me. So I am passing you the share certificate and this indicates that your company23to when David Gray was there.2324A.So I am passing you the share certificate and this indicates that your company	
11to Banners Broker and you are signing that and approving it.11that is my fault for not knowing what I was signing.12approving it.But at that time, I didn't care if he wanted Bazinga or any of that. I didn't want nothing to do with the guy, so I didn't pay total attention. Does that makes sense?14probably14nothing to do with the guy, so I didn't pay total attention. Does that makes sense?15129.Q. Or Banners Broker changed its name to Stellar Point, rather.16138.Q. Okay, well, it'sI certainly understand what you are saying.17A. Was this signed the same day? When 1818I went into the office, that time, to go and see himno, they weren't signed the same day.130.Q. Let's have a look and we will just clarify that for the record.130.Q. Let's have a look and we will just clarify that for the record.130.Q. Now, this isand just pass the one back to me. So I am passing you the share	

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Sheet 9 Page 30	Page 32
K. Stinson - 30 1 141. Q. So have you seen that before today? 2 A. No, no. 3 142. Q. Did you know that your company, 813, owns 150 shares of Stellar Point? 5 A. No, no. All's I can tell you on 6 this one, I never seen this. But when I was in that roomI think I was talking to you on the phone. 8 David Gray had a whole bunch of corporate books. 9 And I was in there, signed, and I can't remember who 10 else came behind me signing. There washe was 11 setting up his big conglomerate. No explanation. 12 143. Q. Okay, so apart from that one 13 instance when you went to the Whitby office and you 14 signed documents with David Gray and Rajiv Dixit, do 15 you recall ever signing any other legal papers in 16 relation to Stellar Point or 813? 17 A. No, no. 18 144. Q. And do you know where the books and 19 records of the 813 Company are? 20 A. 813, that's my company, right? 21 145. Q. Yes. 22 A. Well, that would be me.	K. Stinson - 321151.Q. One of them was marked as an exhibit2on Lorenzo's examination, and it's Exhibit 1.3A. Okay.4152.Q. And there are five bullet points,5starting from the top, indication of a \$35,0006transfer in December 31 of 2012, to your company.7Do you knowcan you tell us anything about the8reason for that transfer?9A. That's China.10153.Q. Okay, and when you say, "That's11China", that was in relation to the purchases of the12Dr. Dre's and the clothes that you made when you13were in China?14A. Yes, now there is \$4,00015154.Q. Sorry, just for the purposes of the16record. And then a month earlier, two months17earlier, there is a \$4,068.31 payment tothe18Stellar Point general ledger and it says that it's19to yourself personally. Do you know anything about20that?21A. You know when I was at the police22station and he asked me about thatand it went to23me personally, right?24155.Q. Yes.25A. The only monies that Raj ever gave
Page 31 K. Stinson - 31 1 that I could possibly say, David Gray, he walked in 2 with all of them. 3 147. Q. Okay, so let'spass that back to 4 me. 5 A. Does that help? 6 148. MR. WARD: Thanks for that. I'm going 7 to mark this as Exhibit 1 on Kelly 8 Stinson's examination, and it's the Stellar 9 Point Share Certificate certifying that 813 10 Company owns 150 shares. 11 EXHIBIT NO. 1: Stellar Point Share Certificate 12 EXHIBIT NO. 1: Stellar Point Share Certificate 14 shares 15 THE DEPONENT: Shouldn't I have minutes 16 THE DEPONENT: Shouldn't I have minutes 17 on that and seen the financials and all 18 that kind of stuff? 19 Q. I think so. 21 149. Q. I think so. 22 A. That never happened. 23 150. Q. I want to show you, next, a couple 24 of documents having to do with money transfers. 25 A. Sur	Page 33 K. Stinson - 33 1 me was pertaining to the import/export. So whenI 2 think it was Paul Kelly who was the police guy 3 that 4 156. Q. In Toronto? 5 A. Well, he came out to Oshawa, he had 6 a whole bunch of people he interviewed, right? 7 157. Q. Okay. 8 A. So he said to me, "Well, that could 9 look like he gave you money so that you didn't have 10 to pay tax on it." And I said, "No. They usually 11 write on that cheque what that's for. That's 12 notno payroll, no shares, no, none of that." 13 Well, I swear to God. 14 158. Q. Okay, so what about the next one, 15 Novembersame date, \$3,600.27 consulting fees, do 16 you know what that relates to? 17 A. No. Because that'sno, it's got 18 to do with the import. Even though I didn't go 19 until OctoberI went to China in October. So 20 that's all import/export. 21 159. Q. And once the moneylike, let's

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	Sheet 10 Page 34	Page 36
	K. Stinson - 34	K. Stinson - 36
1	161. Q. So once it'sit's transferred to a	1 A. Yes, right.
2	bank account in the name of 813 Company?	2 178. Q. And by "TVs", you mean the attempted
3	A. Yes, that's me.	3 purchase of the TVs in Pennsylvania?
4	162. Q. So where did 813 Company do its	4 A. Yes.
5	banking?	
6	A. In Oshawa.	5 179. Q. And then lastly, \$75,000 shareholder 6 loan is recorded for Lorenzo in August of 2013?
7	163. Q. At which branch?	A. Into my account?
8	A. Oh, CIBC at Laval Drive.	8 180. Q. No, it seems like it was a loan, but
9	164. Q. Okay, and did you have signing	9 I don't know that we know where it went. It's just
10	authority for that account?	10 an accounting entry so we don't know. Do you have
11	A. Yes.	11 any information or any understanding?
12	165. Q. Did anybody else?	12 A. No, there's no shareholder loan, I
13	A. It's mine. No, no. That's my	13 can tell you that right now. I think that's an
14	account.	14 absolute debunk. August 31st of 2013?
15	166. Q. Right. And that account was	15 181. Q. Yes.
16	established in relation to the dealings that you had	1 16 A. No.
17	with Rajiv Dixit in Banners Broker?	17 182. Q. Okay, so pass that back to me.
18	A. No, that was established under the	18 A. Okay.
19	guise of Bazinga.	19 183. Q. Thank you. And then I am going to
20	167. Q. But that was established at Rajiv	20 give you this one.
21		21 A. Sure.
22	Dixit's suggestion? A. Yes.	22 184. Q. These are some transaction details
23	168. Q. And you named the company?	23 that also relate to yourself and your company. The
24	A. Yes.	24 first one is dated November 12th, 2013.
25	169. Q. But he told you to set it up?	25 A. M'hmm.
l	Page 35	Page 37
,'	Page 35 K. Stinson - 35	Page 37 K Stinson - 37
	K. Stinson - 35	K. Stinson - 37
1	K. Stinson - 35 A. Yes. He set it up, I didn't do it	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in
1	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did.	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire
1 2 3	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did.	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited.
1 2 3 4 5	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open?	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes.
1 2 3 4 5 6	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes.	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire
1 2 3 4 5 6 7	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that?	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited?
1 2 3 4 5 6 7 8	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one?	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire
1 2 3 4 5 6 7 8 9	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want.	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did
1 2 3 4 5 6 7 8 9 10	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure.	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that?
1 2 3 4 5 6 7 8 9 10 11	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want.	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. Just tell us what you know about it.
1 2 3 4 5 6 7 8 9 10 11 12	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure. 173. Q. We will put it in writing and let you know.	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. Just tell us what you know about it. 12 A. Raj set that up. I know that it's
1 2 3 4 5 6 7 8 9 10 11 12 13	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure. 173. Q. We will put it in writing and let you know. A. Sure.	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. Just tell us what you know about it. 12 A. Raj set that up. I know that it's 13 in Cyprus.
1 2 3 4 5 6 7 8 9 10 11 12 13 14	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure. 173. Q. We will put it in writing and let you know. A. Sure. 174. Q. We will try to make it easy for you,	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. 12 A. Raj set that up. I know that it's 13 in Cyprus. 14 189. Q. Okay, and do you know anything else
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure. 173. Q. We will let you know what we want. A. Sure. 174. Q. We will try to make it easy for you, maybe we will go directly to the bank and get it.	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. Just tell us what you know about it. 12 A. Raj set that up. I know that it's 13 in Cyprus. 14 189. Q. Okay, and do you know anything else 15 about it?
1 2 3 4 5 6 7 8 9 10 11 12 13 14 5 6	 K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure. 173. Q. We will put it in writing and let you know. A. Sure. 174. Q. We will try to make it easy for you, maybe we will go directly to the bank and get it. A. I don't have a problem. 	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. Just tell us what you know about it. 12 A. Raj set that up. I know that it's 13 in Cyprus. 14 189. Q. Okay, and do you know anything else 15 about it? 16 A. Well, I do know that when Cyprus was
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure. 173. Q. We will let you know what we want. A. Okay, sure. 174. Q. We will put it in writing and let you know. A. Sure. 174. Q. We will try to make it easy for you, maybe we will go directly to the bank and get it. A. I don't have a problem. 175. Q. Okay, thank you. And so there are	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. Just tell us what you know about it. 12 A. Raj set that up. I know that it's 13 in Cyprus. 14 189. Q. Okay, and do you know anything else 15 about it? 16 A. Well, I do know that when Cyprus was 17 going crazy, Raj said that any money that was in
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure. 173. Q. We will put it in writing and let you know. A. Sure. 174. Q. We will try to make it easy for you, maybe we will go directly to the bank and get it. A. I don't have a problem. 175. Q. Okay, thank you. And so there are just two more on this sheet, at the bottom. We are 	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. Just tell us what you know about it. 12 A. Raj set that up. I know that it's 13 in Cyprus. 14 189. Q. Okay, and do you know anything else 15 about it? 16 A. Well, I do know that when Cyprus was 17 going crazy, Raj said that any money that was in 18 that account was lost because Cyprus took half that
1 2 3 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 6 7 8 9 10 11 23 4 5 10 11 12 13 4 5 10 10 10 10 10 10 10 10 10 10 10 10 10	 K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure. 173. Q. We will put it in writing and let you know. A. Sure. 174. Q. We will try to make it easy for you, maybe we will go directly to the bank and get it. A. I don't have a problem. 175. Q. Okay, thank you. And so there are just two more on this sheet, at the bottom. We are in 2013 now, a January 31 payment that is indicated 	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. Just tell us what you know about it. 12 A. Raj set that up. I know that it's 13 in Cyprus. 14 189. Q. Okay, and do you know anything else 15 about it? 16 A. Well, I do know that when Cyprus was 17 going crazy, Raj said that any money that was in 18 that account was lost because Cyprus took half that 19 money at the time, in Cyprus. And I said to
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$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\0\\11\\12\\3\\14\\15\\16\\17\\8\\9\\21\\22\\23\end{array}$	 K. Stinson - 35 A. Yes. He set it up, I didn't do it online, he did. 170. Q. And is that account still open? A. Yes. 171. Q. Great and so could we see the bank statements for that? A. If you would like. Do you want the recent one? 172. Q. We will let you know what we want. A. Okay, sure. 173. Q. We will put it in writing and let you know. A. Sure. 174. Q. We will try to make it easy for you, maybe we will go directly to the bank and get it. A. I don't have a problem. 175. Q. Okay, thank you. And so there are just two more on this sheet, at the bottom. We are in 2013 now, a January 31 payment that is indicated as having been made for \$42,000 to Kelly S. for subcontracted services. A. Yes. 	K. Stinson - 37 1 185. Q. It's an outgoing wire transfer in 2 the amount of \$10,000 to a company called AngelFire 3 Ventures Limited. 4 A. Yes. 5 186. Q. Have you ever heard of AngelFire 6 Ventures Limited? 7 A. Yes, that's Lorenzo. 8 187. Q. And that's the overseas account? 9 A. Yes, that's Lorenzo and Raj. Did 10 you want me to get into details of that? 11 188. Q. Just tell us what you know about it. 12 A. Raj set that up. I know that it's 13 in Cyprus. 14 189. Q. Okay, and do you know anything else 15 about it? 16 A. Well, I do know that when Cyprus was 17 going crazy, Raj said that any money that was in 18 that account was lost because Cyprus took half that 19 money at the time, in Cyprus. And I said to 20 Lorenzo, "Well, you wouldn't have much money in that 21 anyhow." So there was a debate on that. He goes, 22 "Oh, don't worry about it, Raj will take care of it. 23 You know, he has got the shares." We ended up

	Sheet 11 Page 38		Page 40
	K. Stinson - 38		K. Stinson - 40
1	190. Q. Right.	1	outgoing wire transfer from a bank in St. Lucia
2	A. Did you want me to stop?	23	called Via Bank. The transaction details is that it
3	191. Q. No, it's fine.		was to your credit.
4	A. Okay. That wasn't myI'm only	4	A. That's St. Lucia, that would be
5	giving you	5	Chris.
67	192. Q. Sorry	6	203. Q. That was Chris' bank account,
8	A. Go ahead. 193. Qdid vou say that Cyprus took half	8	correct. A. Yes.
9	193. Qdid you say that Cyprus took half the money in the Cyprus account?	9	204. Q. So, but he is crediting you with a
10	A. Well, that wasno, they took it	10	payment of almost \$25,000?
11	and gave me shares. And Raj said that Lorenzo lost	11	A. Yes, that's the TV. That's the TV.
12	all his money because Cyprus took half of over	12	There was about \$80,000 in different payments up to
13	\$100,000. Do you remember that time?	13	about \$8,000. That's why you had to jog mywhen
14	194. Q. Was it a financial crisis?	14	you said "St. Lucia", I remembered that's where it
15	A. Yes, but it was another lie.	15	was sent from, okay.
16	Although it was true, Cyprus did do that. And they	16	205. Q. And the next one, June 24th, 2014,
17	did do that to their account, but they didn't do it	17	outgoing wire transfer from the bank in St. Lucia
18	according to how Raj said, meaning Lorenzo was wiped	18	A. Yes.
19	out.	19	206. Qto 813 Company.
20	195. Q. Raj told you that Lorenzo was wiped out?	20	A. Yes. (1.1)
22		21	207. Q. This one is a little over \$73,000.
23	A. Raj told Lorenzo that, that he only had shares in there, there's nothing there. And I	22	A. Yes. 208. Q. What would that relate to?
24	said, "That's crap." But Lorenzo does have the	23	A. The same thing, all import/export,
25	online machine thing that he can check.	25	but
F	age 39		°age 41
	K. Stinson - 39		
			K. Stinson - 41
1	196. Q. Okay, great and we discussed that	1	209. Q. Cause we are over
1 2	 Q. Okay, great and we discussed that with Lorenzo. So the next item, December 6, 2013, 	1	209. Q. Cause we are over A. Oh, we are well over.
3	196. Q. Okay, great and we discussed that with Lorenzo. So the next item, December 6, 2013, outgoing wire transfer to your company, 813	3	 209. Q. Cause we are over A. Oh, we are well over. 210. Q. We are way over the \$80,000 for the
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3 4 5	196. Q. Okay, great and we discussed that with Lorenzo. So the next item, December 6, 2013, outgoing wire transfer to your company, 813 Canada A. M'hmm.	3 4 5	 209. Q. Cause we are over A. Oh, we are well over. 210. Q. We are way over the \$80,000 for the TVs. A. Just for the TVs.
3 4 5 6	 196. Q. Okay, great and we discussed that with Lorenzo. So the next item, December 6, 2013, outgoing wire transfer to your company, 813 Canada A. M'hmm. 197. Qfor \$29,658.15. Do you know what 	3	 209. Q. Cause we are over A. Oh, we are well over. 210. Q. We are way over the \$80,000 for the TVs. A. Just for the TVs. 211. Q. Right.
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22	 196. Q. Okay, great and we discussed that with Lorenzo. So the next item, December 6, 2013, outgoing wire transfer to your company, 813 Canada A. M'hmm. 197. Qfor \$29,658.15. Do you know what that relates to? A. Well, that'sis that? That's around the timeno, that's the Christmastime, okay. And that looks like an amountis that the same amount as the earlier page? 198. Q. No, it's a different amount. A. Okay. It's the importbut we are going to have to go back and look at my account. 199. Q. Okay. A. I mean, I have no problems with that. 200. Q. So I will get an undertaking from you at the end. A. Okay. 201. Q. The next onejust two more. April 22nd, 2014, and we are in last spring, \$24,422.94 	3 4 5 6 7 8 9 10 11 12 13 14 15 16 7 8 9 20 21 22	 209. Q. Cause we are over A. Oh, we are well over. 210. Q. We are way over the \$80,000 for the TVs. A. Just for the TVs. 211. Q. Right. A. And then there wasgosh, well, that \$30,000I can't remember offhand, right now. We can pull up my bank account. 212. Q. We will get the bank statements for 813's bank account at MR. HORKINS: Where is the bank account? THE DEPONENT: CIBC. 213. MR. WARD: CIBC. THE DEPONENT: Yes. BY MR. WARD: 214. Q. And did 813 Company have any other bank accounts? A. No. 215. Q. It never had any other bank account?

			D. 44
$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\\24\\25\end{array}$	Sheet 12 Page 42 K. Stinson - 42 A. None, I always used CIBC. 217. Q. Royal Bank, which branch? A. Taunton Road and Harmony Road in Oshawa. 218. Q. So why was that one set up, the Royal Bank of Canada? A. I set that one up. I liked Royal, Raj insisted on CIBC. That's it, but I never did anything with Royal. 219. Q. And is that account still open? A. It's dormant. 220. Q. Okay, so please give us anything that you have in relation to that bank account, as well? A. Okay, yes. U/T 221. Q. Okay. A. I didn't do any business out of that one, but I can give it to you. That's no problem. 222. Q. Okay. I'll take that back, actually. A. Okay. A. I didn't we just take a break right now. I am going to check my notes. That may be all that we have for you, Kelly. Okay, so off the record.	$\begin{array}{c}1\\1\\2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\\24\\25\end{array}$	Page 44 K. Stinson - 44 A. Raj, to drop my passport at David Gray's office. 230. Q. And David Gray's office is where? A. Whitby. 231. Q. Okay. A. Okay. But so did Jenn, his first wife and, I think, Lorenzo. No explanation. None of this stuff gets explained. So, fine. Then summoned to the office in Whitby to meet up with the lawyer to sign papers. And that's what you see. No explanation, just papers on a big table, a bunch of burgundy books. I assume they were corporate books. And I did see one paper that stated, you know, "Dixit Holdings". I was a little nosy and seen his whole, how would you say, set-up, with allnow, Bazinga was there, but he said, "Don't worry about it", he's taking over all that. So when I came back from China, shortly after that, I had had enough of him. His demeanour and demoralizing, I didn't want to do business with this guy. And that's why I am a little fuzzy with these numbers in the account. 232. Q. Okay, so I think the way we are going to handle that is the same undertaking that we asked for and received from Lorenzo.
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9 20 21 22 23 24 25	 K. Stinson - 43 DISCUSSION OFF THE RECORD BY MR. WARD: 224. Q. The question is, Ms. Stinson, can you just describe for us again the circumstances in which David Gray presented you with a bunch of corporate documents to sign in relation to the 813 Company? A. So, I was told to come down to the office and sign some papers. And that jogs my memory too that I had to drop my passport off at his office. 225. Q. This is who? A. David Gray. 226. Q. And which office were you told to come down to? A. Whitby. 227. Q. So Dixit's office? A. Yes. 228. Q. Okay. A. No, the lawyer's office. My passport, David Gray. Are we on the same page here or did I just flip one? 229. Q. No, I think I got lost at some point. But you were asked by who to go where?	$\begin{array}{c} 1\\ 1\\ 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\\ 24\\ 25\end{array}$	 K. Stinson - 45 A. Okay. 233. Q. Is we will send you a note with a summary of these transactions A. Okay. 234. Qand there's only a dozen of them. A. Yes. 235. Q. And if you could check your records and speak to Lorenzo A. And put 236. Qand give us your best information as to the reason why those monies appear to have been sent to either yourself, your company or AngelFire and then what happened to the monies? A. Yes. 237. Q. And any supporting paperwork related to that, that would be appreciated. A. Okay. 238. Q. So, thanks for that. A. I have no problem. And that will probably jog my memory seeing all this together, okay. 239. Q. And then a couple of other things. A. Okay. 240. Q. And we are switching gears now. A. Sure.

	Sheet 13 Page 46		Page 48
	K. Stinson - 46		K. Stinson - 48
1	241. Q. We are talking about Rajiv Dixit and	1	A. The \$30,000, okay. I heard the
			CE 000 ring through the office. New Lemmet
2	his fianc,, now wife, Stephanie Schlacht. Have you	2	\$65,000 ring, through the office. Now, I am not
3	met Stephanie before?	3	sure if it was my brother-in-law, Frank, when he
4	A. Yes.	4	worked there as a maintenance guy. Because she was
4 5 6 7	242. Q. Do you know anything about a ring	5	flashing it around Stephanie.
6	that	6	259. Q. Okay, so now we are talking, just to
7	A. A ring?	7	be clear for the record, about a second ring.
l g	243. Q. A ring that	8	A. Oh, yes.
8 9		9	260. Q. For Stephanie Dixit?
10	A. Oh, that's just one thing.		
10	244. Q. Let's start with the ring. Tell me	10	A. Yes.
11	what you know about the	11	261. Q. And you believe that Raj bought that
12	A. Do you want the list of jewellery?	12	ring for her?
13	245. Q. Well, what do you know about	13	A. Yes.
13 14	A. From which wife?	14	262. Q. And what else do you know about
15 16	246. Q. Why don't you just start from the	15	that?
16	beginning and tell me what you know about the	16	A. About the ring?
17	jewellery.	17	263. Q. Yes.
18	A. This is where I can just be so	18	
19	norty All right \$1,000 Guori		A. Well, she was flashing it around and
	nasty. All right, \$1,800 Gucci	19	told a few people in the office that it was \$65,000.
20	247. Q. Who are we talking about now?	20	264. Q. But you didn't see the ring.
21	A. Raj.	21	A. Oh, I've seen the ring.
22	248. Q. Ŕaj, okay.	22	265. Q. Describe for me how you came to see
23	A. His purchasing.	23	the ring?
24	249. Q. Purchasing?	24	A. Okay, just online, because I had
25	A. Yes.	25	nothing to do with that. So I seen it online. You
120	Π. 103.	120	nothing to do with that. So i seen it online. Tou
	Page 47		Page 49
	Page 47 K. Stinson - 47		Page 49 K. Stinson - 49
1	Rage 47 K. Stinson - 47 K. Stinson - 47 K. Stinson - 47	1	K. Stinson - 49 K. Stinson - 49 can go online and see it, if you want, on his
1 2	K. Stinson - 47 250. Q. For who? A. Himself. And do you want me to	1	K. Stinson - 49 K. Stinson - 49 can go online and see it, if you want, on his Facebook.
1 2 3	K. Stinson - 47 250. Q. For who? A. Himself. And do you want me to start with the first wife?	1 2 3	K. Stinson - 49 K. Stinson - 49 can go online and see it, if you want, on his Facebook. 266. Q. Okay.
1 2 3 4	K. Stinson - 47 K. Stinson - 47 250. Q. For who? A. Himself. And do you want me to start with the first wife? 251. Q. Sure.	1 2 3 4	K. Stinson - 49 Can go online and see it, if you want, on his Facebook. 266. Q. Okay.
1 2 3 4 5	K. Stinson - 47 K. Stinson - 47 250. Q. For who? A. Himself. And do you want me to start with the first wife? 251. Q. Sure. A. Okay, that was a \$30,000 engagement	1 2 3 4 5	K. Stinson - 49 K. Stinson - 49 can go online and see it, if you want, on his Facebook. 266. Q. Okay. A. Nothing that he did waswhen it came to flash, was hidden. So, if you want the
1 2 3 4 5 6	K. Stinson - 47 K. Stinson - 47 250. Q. For who? A. Himself. And do you want me to start with the first wife? 251. Q. Sure. A. Okay, that was a \$30,000 engagement ring, that was one. I believe that's Oshawa	1 2 3 4	K. Stinson - 49 K. Stinson - 49 can go online and see it, if you want, on his Facebook. 266. Q. Okay. A. Nothing that he did waswhen it came to flash, was hidden. So, if you want the list, I'll start. So, let's go back to the first
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1 2 3 4 5 6 7 8 9 10 11 12 13	 K. Stinson - 47 250. Q. For who? A. Himself. And do you want me to start with the first wife? 251. Q. Sure. A. Okay, that was a \$30,000 engagement ring, that was one. I believe that's Oshawa Jewellers. Prior to that one, I think he spent \$8,000 on a new ring set prior, before he got her the \$30,000 one. 252. Q. And just give me the name of his first wife, so we can be certain who we are talking about. A. Jenn. 	1 2 3 4 5 6 7 8 9 10 11 12 13	 Rage 49 K. Stinson - 49 can go online and see it, if you want, on his Facebook. 266. Q. Okay. A. Nothing that he did waswhen it came to flash, was hidden. So, if you want the list, I'll start. So, let's go back to the first wife. So I can tell you with Jenn, there wasthe first set was \$8,000. The second ring, which was an engagement ring, which they took the private jet to the Bahamas, between Christmas and New Years, that was \$30,000. I know that because he talked to me about spending \$30,000 on a ring of a girl that is just not with it.
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 K. Stinson - 47 K. Stinson - 47 Q. For who? A. Himself. And do you want me to start with the first wife? 251. Q. Sure. A. Okay, that was a \$30,000 engagement ring, that was one. I believe that's Oshawa Jewellers. Prior to that one, I think he spent \$8,000 on a new ring set prior, before he got her the \$30,000 one. 252. Q. And just give me the name of his first wife, so we can be certain who we are talking about. A. Jenn. 253. Q. Jenn, okay. How do you know this, in terms of the \$30,000 and \$8,000 purchases? A. Women can't keep their mouths shut. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Page 49
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 K. Stinson - 47 Q. For who? A. Himself. And do you want me to start with the first wife? 251. Q. Sure. A. Okay, that was a \$30,000 engagement ring, that was one. I believe that's Oshawa Jewellers. Prior to that one, I think he spent \$8,000 on a new ring set prior, before he got her the \$30,000 one. 252. Q. And just give me the name of his first wife, so we can be certain who we are talking about. A. Jenn. 253. Q. Jenn, okay. How do you know this, in terms of the \$30,000 and \$8,000 purchases? A. Women can't keep their mouths shut. 254. Q. Okay. A. That's the best I can tell you. 255. Q. So did A. Raj told me that was \$30,000. 	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Page 49 K. Stinson - 49 can go online and see it, if you want, on his Facebook. 266. Q. Okay. A. Nothing that he did waswhen it came to flash, was hidden. So, if you want the list, I'll start. So, let's go back to the first wife. So I can tell you with Jenn, there wasthe first set was \$8,000. The second ring, which was an engagement ring, which they took the private jet to the Bahamas, between Christmas and New Years, that was \$30,000. I know that because he talked to me about spending \$30,000 on a ring of a girl that is just not with it. He was abusive to her and the kids, so whether this is on or off the recordand I said, "Why are you going to marry her if sheyou don't get along?" So, there's that. There'soh, my goodness, there's necklaces and earrings, diamonds, pearls. I did talk to Jenn. At one point, Jenn had sold quite a few pieces of her jewellery. She had a lot.

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	Sheet 14 Page 50		Page 52	
	K. Stinson - 50		-	K. Stinson - 52
2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 20 11 2 2 3 4 5 6 7 8 9 10 11 2 2 3 4 5 6 7 8 9 10 11 2 2 3 4 5 6 7 8 9 10 11 2 2 3 4 5 6 7 8 9 10 11 2 2 3 4 5 6 7 8 9 10 11 2 2 3 4 5 10 1 1 2 2 3 4 5 10 1 1 2 2 3 4 5 1 1 2 2 3 4 5 1 1 2 2 3 4 5 1 2 3 4 5 1 1 2 2 3 4 5 1 2 2 3 4 5 1 2 2 3 4 5 1 2 2 3 4 5 1 2 2 3 4 5 2 2 2 2 3 4 5 2 2 3 4 5 2 2 2 2 3 4 5 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	 glee. Okay, so the private jet to the Bahamas and that's where he gave her, the first wife, that. So that was in between December and January, New Year's Eve. When we went to Portugal for Claudia's wedding, we were summoned to go up and meet up with the ICs and Raj in Spain. So we left there and went up to Spain. And there was a meeting on the beach with Fraser, who is with Raj right now in his new business, RevStar, and Neil and Deb Pocock, wonderful people, don't have a dime from all this. He was an IC in Spain. Anyhow, so I will tell you a few of the undertakings there. He went to Louis Vuitton, there were all kinds of things purchased at the Louis Vuitton shop in Spain. 267. Q. Sorry, who went there? A. This is when he was with Stephanie. 268. Q. Right. A. Still with Jenn, and Stephanie was his assistant, but they were together. 269. Q. And what happened at the Louis Vuitton shop? A. Well, I can tell you right now, 	2345678910112345678900111234156178922232425	you really to Oshawa his spendi Now Rolex wate Do you gu Breitling. 276. Q. A. them. 277. Q. A. Probably a words, tho 278. Q. during the Broker? A. and I was, opening. S	f the Okay, oh, some of the purchases. If want to know what Raj purchased, just go a Jewellers and get their accounting of all ng. You will see a lot of it there. , I do know he come home with a lot of ches, a Breitlingwhat's the other one? ys know watches? A \$30,000not a It was a watch? Oh, yeah. He's got about 10 of What else, that you saw? Oh, he's got rings. And cufflinks. about \$300,000 in watches. That's not my se are his. And this jewellery was purchased time that he was involved with Banners Yes. And this is where I stood back likewhen we were in Portugal for the So let's go back there for a second, he
L	 A. Weil, real tell you hight how, Page 51 K. Stinson - 51 there was an \$1,800 diaper bag purchased. 270. Q. Were you there? A. I wasn't in the store. It was brought back and shown to me. 271. Q. Okay, by who? A. Raj. There was a purse that he bought for her, and there was a wallet bought for me. I still have it in the box. If you want it, you can have it, because I want nothing to do with it. 272. Q. Okay, so the purse that was purchased at the conference in Spain, did someone show that to you, as well? A. Yes. Stephanie was showing it off. 273. Q. Okay. A. Yes. \$1,800 diaper bag. 274. Q. Okay. A. Does that not just send you like, sideways? So when I seen that, the following day we were leaving to go home, and he brought up the Louis Vuitton box. And it's a small, like, wallet, red clutch. He said, "Here, I bought this for you", me. Okay. I open it up and I look at it and say, "Okay." I don't even know what it's worth. It's still in the box. You guys can have it if you want, I could 		were made Oshawa Je 279. Q. A. went shopp withJenn his shoppin all the shop bought me, just looking He bo I think that you want th like that. I But th when I star was the pri there was a vacations e a sudden y opinion, ok You g basement u down on hi	K. Stinson - 53 for the people. So you will see that with eveller. You will see the BB rings made. Yes. And his personal things made. We bing and he boughtJenn, at the time, was and Steph were both there, but he did og sprees and his mom was there and did oping sprees, but I will tell you he , at the time, a \$200 GUESS watch. I was jin the window and he paid for it. bught Lorenzo a pen, a Montblanc pen. was \$300, it's still in the box. If nat, you can have that, too. We are not don't care about that stuff. ne money was flowing there, that's ted to see it. What really took me back vate jet to the Bahamas. And I believe a private jet to Israel. And there was everywhere. There was the house. All of ou go fromand this is just my personal

	Sheet 15 Page 54		Page 56
	K. Stinson - 54		K. Stinson - 56
1	redesigned, minimum twice, ripped out, done again,	1	went. There are also pictures you may see on
2	ripped out. \$18,000 in interlocking brick on the	2	Facebook of them renting jet skies when they were in
3	front of the house. \$2,800 to put up Christmas	23	Israel with David Halchern (phon.). These are
1	lights. Why do I know this? Because he brags.	4	things you hear and there are pictures.
5		5	so it was quite a lavish lifestyle. Vet he
	280. Q. Yes, that's what I was going to ask		So it was quite a lavish lifestyle. Yet he
6	you.	6	said to me he only earned \$250,000 a year. Well,
	A. Okay, because I would		when you say to me you earn \$250,000 a year, how do
8	281. Q. So Rajiv Dixit has told you what he	8	you come up with all these trinkets? I will say
9	paid for these things?	9	that I was with Lorenzo, Raj at Christmastime at the
10	A. What I am telling you is what I hear	10	suit store here, at the Eaton Centre, Holt Renfrew
11	from Raj.	11	is it?
12	282. Q. Okay, and you knew him before	12	288. Q. Harry Rosen?
13	Banners Broker?	13	A. Harry Rosen, thank you. And then
14	A. Oh, yeah.	14	Lorenzo got fitted for a suit. And Lorenzo
15	283. Q. How long had you known him prior to	15	hasand he did tell me outsideI think we have
16	Banners Broker?	16	that bill. I am going to really try and check it.
17	A. Lorenzo and himLorenzo did	17	That was a \$35,000 bill.
18	networking, again, as I said, our background.	18	289. Q. Of whathow would you have the
19	Lorenzo félt sorry for him. Lorenzo ended upso	19	bill for that?
20	let's go back at least five years prior to.	20	A. Because Lorenzo's suit didn't fit,
21	284. Q. Okay.	21	so he had to take it back. Raj gave him the bill.
22	A. Lorenzo gave him a car to use, gave	22	290. Q. Oh, okay, great. So could you check
23	him money. It's I don't know what it was with	23	to see if you have it?
24	Lorenzo, he felt sorry for the guy.	24	A. I have got to try and find that,
25	285. Q. Okay. And so justmaybe you can	25	absolutely. Because, and I will tell you when I
1	Page 55		
	Page 55 K Stincon - 55		Page 57
	K. Stinson - 55		Page 57 K. Stinson - 57
1	K. Stinson - 55 finish describing for me	1	K. Stinson - 57 started to see Raj back-stabbing Lorenzo, almost
1	K. Stinson - 55 finish describing for me A. Okay.	1	K. Stinson - 57 K. Stinson - 57 started to see Raj back-stabbing Lorenzo, almost from the get-go, but Lorenzo was not listening to
1	K. Stinson - 55 finish describing for me A. Okay. 286. Qyour observations as to how Rajiv	1 2 3	K. Stinson - 57 started to see Raj back-stabbing Lorenzo, almost from the get-go, but Lorenzo was not listening to me. For some reason he felt sorry for this guy and
1 2 3 4	K. Stinson - 55 finish describing for me A. Okay. 286. Qyour observations as to how Rajiv Dixit's life changed after Banners Broker?	1 2 3 4	K. Stinson - 57 started to see Raj back-stabbing Lorenzo, almost from the get-go, but Lorenzo was not listening to me. For some reason he felt sorry for this guy and I said, "Watch what's going on here. I don't trust
1 2 3 4 5	K. Stinson - 55 finish describing for me A. Okay. 286. Qyour observations as to how Rajiv Dixit's life changed after Banners Broker? A. Well, he got too big for his	1 2 3 4 5	K. Stinson - 57 started to see Raj back-stabbing Lorenzo, almost from the get-go, but Lorenzo was not listening to me. For some reason he felt sorry for this guy and I said, "Watch what's going on here. I don't trust Raj."
1 2 3 4	K. Stinson - 55 finish describing for me A. Okay. 286. Qyour observations as to how Rajiv Dixit's life changed after Banners Broker? A. Well, he got too big for his britches, and I think when the company started out	1 2 3 4 5 6	K. Stinson - 57 started to see Raj back-stabbing Lorenzo, almost from the get-go, but Lorenzo was not listening to me. For some reason he felt sorry for this guy and I said, "Watch what's going on here. I don't trust Raj." Chris, I never had an opinion on. So when
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	Three 10 Dama EQ	r	
	Sheet 16 Page 58 K. Stinson - 58		K. Stinson - 60
1	Well, I will give you one story. They were	1	if you make \$250,000, which would, I guess, be fair
2	in on a meeting and Raj goes, "Yeah, look at my	2	as the president of a corporation. I will give him
2 3 4	watch, Nick." Well, Nick's got the \$100 phony, you	23	that. But the numbers on this side don't add up to
4	know. They got mixed up. Nick ended up with his	4	this side of the spending. And that's what worried
5	real one. And he goes, "Come on, Nick, give me back	5	me.
6	my watch." Nick had his. And Lorenzo goes, "Yeah,	6	297. Q. When was the last time that you had
7	Nick, just give " you know. And Nick goes, "Raj,	7	any contact with Rajiv Dixit?
8	I have got the real one." And they are all telling	8	A. To see him?
9	him, "Nick, just be quiet." Like, you couldn't tell	9	298. Q. Or to speak to him on the phone or
10	the difference.	10	by e-mail?
11	291. Q. Right, right.	11	A. I did send him a text when Lorenzo
13	A. But it's a \$100 watch and Raj went out and got the real deal for \$30,000 or \$35,000.	12	and him were fighting. I haven't talked to him probably since I was in that office signing those
14	He has got that watch thing that goes like this, you	14	papers with David. That's my belief.
15	know, so that it keeps all his watches ticking.	15	299. Q. Okay.
16	292. Q. Okay.	16	A. After that, no.
17	A. So if you make \$250,000 a year, as a	17	300. Q. Sorry, you said you sent him a text,
18	salary, why do you put \$125,000 down on a house, and	18	was that around the same time?
19	how do you buy a \$30,000 ring, a \$65,000 ring, all	19	A. That was when Lorenzo quit and he
20	the trinkets. And I can tell you, if you wanted to	20	threatened Nick and Lorenzo. And I don't know if
21	know what he bought Jenn, there was so much	21	Lorenzo got into that. He threatened my son.
22 23	jewellery. I can't even tell you how much. I can	22	301. Q. So why don't you justyou sent him
23	only tell you what I see. The Gucci watches to	23	a text about that?
24	Jenn, I do remember that.	24	A. No, I just saidI still have the
25	293. Q. Did you know Jenn, then?	25	text, I believe, something like, "You better make it
	Page 59	F	
	K Stincon 50		Page 61 K Stincon 61
1	K. Stinson - 59	1	K. Stinson - 61
1	A. Yes.	1	K. Stinson - 61 right with Lorenzo." Lorenzo is Italian. I have to
1 2 3	A. Yes. 294. Q. Is that how you saw them?	1	K. Stinson - 61 right with Lorenzo." Lorenzo is Italian. I have to be honest, he has got great patience, obviously.
23	A. Yes. 294. Q. Is that how you saw them? A. Yes. It started with the Gucci	1 2 3	K. Stinson - 61 right with Lorenzo." Lorenzo is Italian. I have to be honest, he has got great patience, obviously. You see thatend up with that wingnut for so long,
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1	K. Stinson - 62 A. Maybe longer. Not a lot of dealings		2			K. Stinson - 64	
234	with Chris. 308. MR. WARD: Okay. Thanks for your time today.	1 2	INDEX OF UNDERTAKINGS				
4	iouay.	3 4 5 6 7	REFEI NUMB	RENCE SER	PAGE NUMBER	QUESTION NUMBER	
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1 2	INDEX OF EXHIBITS	1 2 3 4					
2 3 4 5 6 7 8 9 10 11	EXHIBIT PAGE NUMBER DESCRIPTION NUMBER 1. Stellar Point Share 31 Certificate certifying that 813 Company owns 150 shares	4 5 6 7 8 9 10 11 12	REPORTER'S NOTE:				
			Please be advised that any undertakings, objections, advisements and refusals are provided as a service to all c their guidance only, and do not purport to be legally bindi necessarily accurate and are not binding upon Victory Verba Reporting Services Inc.				
							12 13
		15 16 17 18	I hereby certify the foregoing to be a true and accu transcription of the above-noted proceedings held before me 21ST DAY OF APRIL, 2015, and taken to the best of my skill, ability and understanding.				
		19 20 21 22 23					
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		27 28 29 30	} Ardita Balilaj } Verbatim Reporter				

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Tab N



Toronto Police Service News release

40 College Street · Toronto, ON · M5G 2J3

www.torontopolice.on.ca

Arrests in \$93M US pyramid scheme, Toronto and Vancouver men charged

Broadcast time: 10:39 Wednesday, December 9, 2015

Financial Crimes 416-808-7300

Case #: 2014-1863297

The Mass Marketing Section of the Toronto Police Service Financial Crimes Unit is a member of the Toronto Strategic Partnership against Cross-Border Fraud. The partnership represents a combined enforcement strategy, specializing in the investigation of mass marketing fraud in, or originating from within the province of, Ontario with cross-border implications.

In January 2013, the Financial Crimes Unit started an investigation into an alleged pyramid scheme. The Toronto Police Service was assisted by investigators from the RCMP, Competition Bureau of Canada, Ministry of Government and Consumer Services, Ministry of Finance, U.S. Federal Trade Commission, FINTRAC, and the Canada Revenue Agency.

It is alleged that:

- between October 2010 and March 2013, a pyramid scheme known as "Banners Broker" was operated out of a Church Street address in Toronto

- the scheme offered participants the opportunity to double their money by investing in an advertising company that had access to a "globally renowned network"

- participants were led to believe their investments were being applied towards a program that offered payment for the direction of web traffic via referral links

- the program's existence was entirely dependent upon the fee-based entry of new members and little or no real product or service was provided

- new investors were drawn into the scheme via a series of false or misleading representations

- by the end of 2012, over \$93 million US was obtained from thousands of participants, of which approximately \$45 million was paid back to participants in the scheme

- the remaining funds were funneled to a number of offshore accounts in Belize, St. Lucia, Cyprus, and others

ID: 33520

On Wednesday, December 9, 2015, Christopher George Smith, 45, of Toronto, and Rajiv Dixit, 45, of Vancouver, were arrested. They are charged with:

- 1) Defraud the Public Over (\$5000)
- 2) Possession of Proceeds of Crime
- 3) Launder Proceeds of Crime
- 4) Operate Scheme of Pyramid Selling (Competition Act)

5) Make False or Misleading Representations (Competition Act)

The were scheduled to appear in court at Old City Hall on Wednesday, December 9, 2015,. The proceedings are subject to a publication ban.

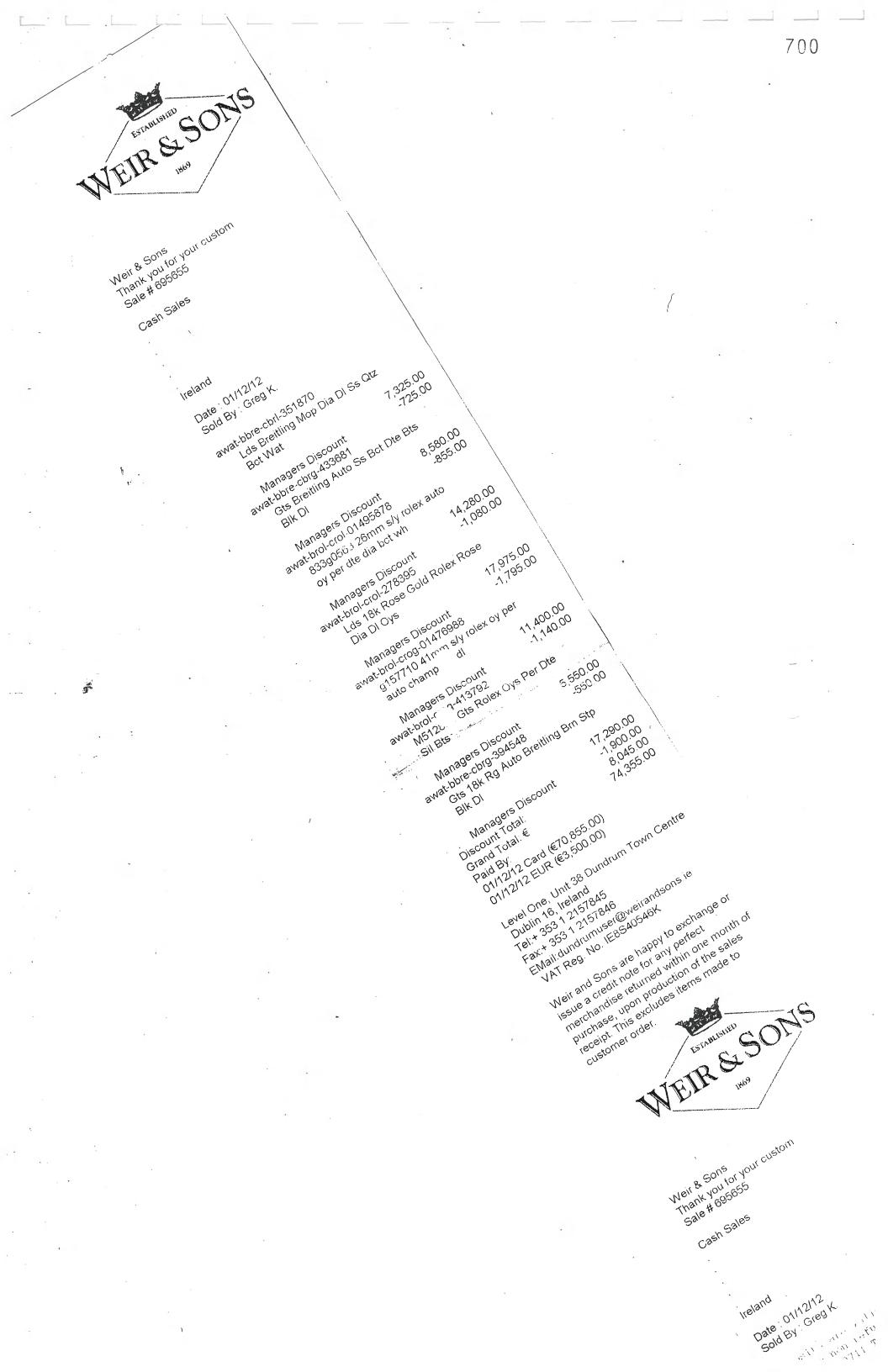
Watch the news conference here.

Please download the Toronto Police Service Mobile App for iOS or Android.

For more news, visit <u>TPSnews.ca</u>.

Constable Victor Kwong, Corporate Communications, for Detective Sergeant Ian Nichol, Financial Crimes

Tab O



TRANSACTION DECLINED CARD SALE CUSTOMER COPY

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01-12-12 15:19 TERMINAL-USER-TRAN 71007324-0001-7273

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14

WEIR AND SONS DUNDRUM UNIT 38 LEVEL 1. DUNDRUM TOWN CTR DUBLIN 14

MASTERCARD EXPIRY DATE **/**

SALE TOTAL

EUR1845.00 DECLINED NOT AUTHORISED TRANSACTION

DECLINED PLEASE RETAIN THIS RECEIPT FOR YOUR RECORDS.

CARD SALE VOUCHER CUSTOMER COPY

01/12/12 15:29 TERMINAL-USER-TRAN 71007324-0001-7277

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213

WEIR AND SONS DUNDRUM UNIT 38 LEVEL 1, DUNDRUM TOWN CTR DUBLIN 14

MERCHANT ID : 913472364 GOODS TOTAL EUR11000.00

CANADIAN \$ EXCHANGE RATE 1.3419

жжжжжжжжжжжа 1563 ICC

VISA APSN=01 AID = 'A0000000031010' VISA EXPIRY DATE MM/MM START DATE 07/12

SALE TOTAL TRANSACTION CURRENCY CAD14760.90

CHRISTOPHER SMITH

PIN VERIFIED

CARDHOLDER HAS CHOSEN TO PAY IN CAU THIS TRANSACTION IS BASED ON REUTERS WHOLESALE INTERBANK EXCHANGE RATE PLUS 3.5 PERCENT INTERNATIONAL CONVERSION MARGIN.

THIS IS NOT AN ADDITIONAL FEE AND REPLACES CURRENCY CONVERSION CHARGES NORMALLY APPLIED.

MY CHOICE IS FINAL, TRANSACTIONS CAN ALSO BE CONDUCTED IN EUR.

THE CURRENCY CONVERSION SERVICE IS PROVIDED TO THE REPCHANT BY FEXED DCC IN ASSOCIATION HITH AIB BANK LTD

PLEASE RETAIN THIS RECEIPT FOR YOUR RECORDS.

AUTH CODE = 002347 101

CARD SALE VOUCHER CUSTOMER COPY

01-12-12 15:20 TERMINAL-USER-TRAN 71007324-0001-7274

WEIR AND SONS DUNDRUM UNIT: 38 LEVEL 1. DUNDRUM TOWN CTR DUBLIN:14

MASTERCARD EXPIRY DATE ****

SALE TOTAL

EUR1845.00

PLEASE DEBIT MY ACCOUNT WITH THE TOTAL AMOUNT IN EUR SHUHN.

SIGNATURE VERIFIED

PLEASE RETAIN THIS RECEIPT FOR YOUR RECORDS.

AUTH CODE = 287629 D@1

CARD^Y SALE VOUCHER CUSTOMER COPY

01-12-12 15:36 TERMINAL-USER-TRAN 71007324-0001-7278

WEIR AND SONS DUNDRUM UNIT 38 LEVEL 1. DUNDRUM TOWN CTR DUBLIN 14

MERCHANT ID : 913472364 GOODS TOTAL EUR37700.00

CANADIAN \$ EXCHANGE RATE 1.3419

*******************2415 ICC

Visa Credit APSN=02 AID = 'A000000031010' VISA EXPIRY DATE ***** START DATE 09/12

SALE TOTAL TRANSACTION CURRENCY CAD50589.63

RAJIV DIXIT

PIN VERIFIED

CARDHOLDER HAS CHOSEN TO PAY IN CAD.THIS TRANSACTION IS BASED ON REUTERS WHOLESALE INTERBANK EXCHANGE RATE PLUS 3.5 PERCENT INTERNATIONAL CONVERSION MARGIN.

THIS IS NOT AN ADDITIONAL FEE AND REPLACES CURRENCY CONVERSION CHARGES NORMALLY APPLIED.

MY CHOICE IS FINAL. TRANSACTIONS CAN ALSO BE CONDUCTED IN EUR.

THE CURRENCY CONVERSION SERVICE IS PROVIDED TO THE MERCHANT BY FEXCO DCC IN ASSOCIATION WITH AIB BANK LTD.

PLEASE RETAIN THIS RECEIPT FOR YOUR RECORDS.

AUTH CODE = 015374 I01

CUSTOMER COPY

01/12/12 15:14 TERMINAL-USER-TRAN 71007324-0001-7271

WEIR AND SONS DUNDRUM UNIT 38 LEVEL 1. DUNDRUM TOWN CTR DUBLIN 14

MERCHANT ID : 913472364 GOODS TOTAL. EUR14775.00

US DOLLAR EXCHANGE RATE 1.3517

ELECTRON VISA APSN=00 AID = 'A0000000032010' VISA EXPIRY DATE ***/*** START DATE 96/12

SALE TOTAL TRANSACTION CURRENCY USD19971.37

RAJIV DIXIT

PIN VERIFIED

CARDHOLDER HAS CHOSEN TO PAY IN USD.THIS TRANSACTION IS BASED ON REUTERS WHOLESALE INTERBANK EXCHANGE RATE PLUS 3.5 PERCENT INTERNATIONAL CONVERSION MARGIN.

THIS IS NOT AN ADDITIONAL FEE AND REPLACES CURRENCY CONVERSION CHARGES NORMALLY APPLIED.

MY CHOICE IS FINAL. TRANSACTIONS CAN ALSO BE CONDUCTED IN EUR.

THE CURRENCY CONVERSION SERVICE IS PROVIDED TO THE MERCHANT BY FEXCO DCC IN ASSOCIATION WITH AIB BANK LTD.

PLEASE RETAIN THIS RECEIPT FOR YOUR

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CARD SALE VOUCHER CUSTOMER COPY

01/12/12 15:17 TERMINAL-USER-TRAN 71007324-0001-7272

HEIR AND SONS DUNDRUM UNIT 38 LEVEL 1. DUNDRUM TOWN CTR OUBLIN 14

MASTERCARD EXPIRY DATE **/**

SALE TOTAL

EUR1845.00

RAJIV DIXIT

PLEASE DEBIT MY ACCOUNT WITH THE TOTAL AMOUNT IN EUR SHOWN.

SIGNATURE VERIFIED

PLEASE RETAIN THIS RECEIPT FOR YOUR RECORDS.

AUTH CODE = 686903 D01

CARD SALE VOUCHER CUSTOMER COPY

01/12/12 15:22 TERMINAL-USER-TRAN 71007324-0001-7275

WEIR AND SONS DUNDRUM UNIT 38 LEVEL 1. DUNDRUM TOWN CTR DUBLIN 14

MERCHANT ID : 913472364 MERCHANT ID : 913472364

MASTERCARD EXPIRY DATE **/**

SALE TOTAL

EUR1845.00

CHRISTOPHER G SMITH

PLEASE DEBIT MY ACCOUNT WITH THE TOTAL AMOUNT IN EUR SHOWN.

SIGNATURE VERIFIED

PLEASE RETAIN THIS RECEIPT FOR YOUR RECORDS. AUTH CODE = 388647 D01

TRANSACTION CANCELLED CARD SALE CUSTOMER COPY

01/12/12 15:27 TERMINAL-USER-TRAN 71007324-0001-0000

WEIR AND SONS DUNDRUM UNIT 38 LEVEL 1. DUNDRUM TOWN CTR DUBLIN 14

MERCHANT ID : 913472364

VISA APSN=01 AID = 'A000000031010' VISA EXPIRY DATE ***** START DATE 07/12

SALE TOTAL

EUR10500.00

CHRISTOPHER SMITH

TRANSACTION CANCELLED PLEASE RETAIN THIS RECEIPT FOR YOUR RECORDS.

CARD SALE VOUCHER CUSTOMER COPY

01-12-12 15:23 TERMINAL-USER-TRAN 71007324-0001-7276

WEIR AND SONS DUNDRUM UNIT 38 LEVEL 1. DUNDRUM TOWN CTR DUBLIN 14

MASTERCARD EXPIRY DATE **/**

SALE TOTAL

EUR1845.00

CHRIS SMITH

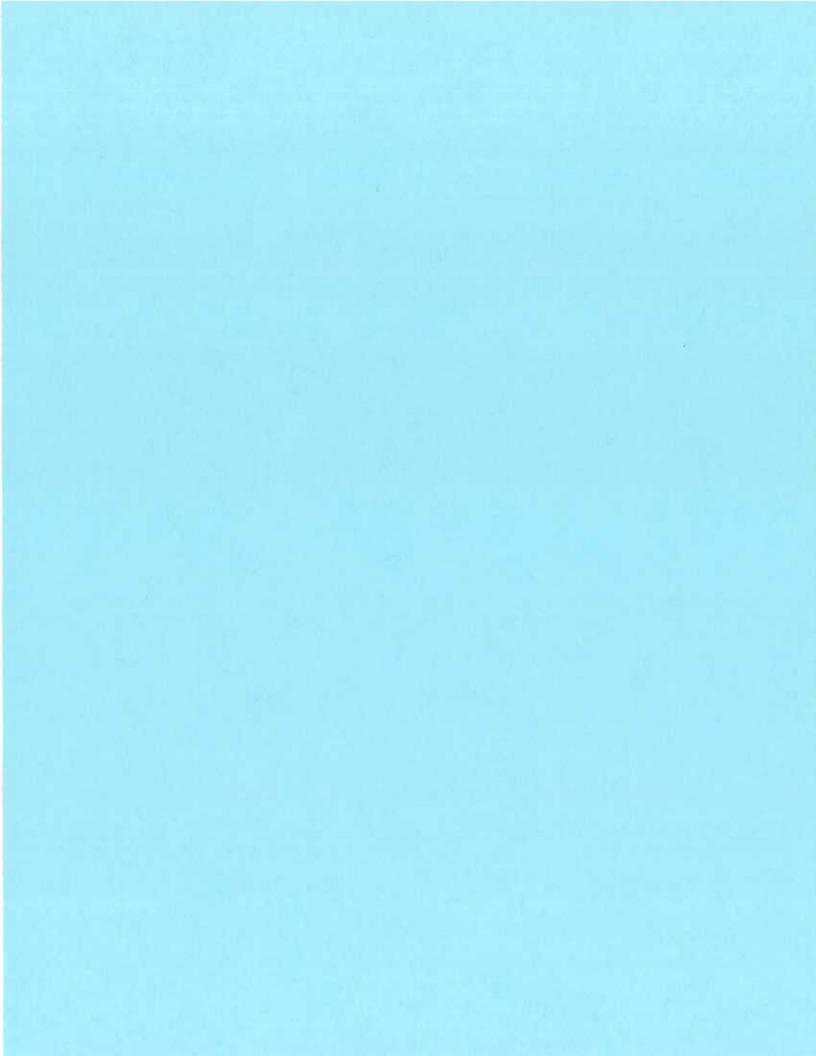
PLEASE DEBIT MY ACCOUNT WITH THE TOTAL AMOUNT IN EUR SHOWN.

SIGNATURE VERIFIED

PLEASE RETAIN THIS RECEIPT FOR YOUR RECORDS.

AUTH CODE = 188582 DQ1

703





-120-056448

Prepared for: MR RAJIV DIXIT November 28 to December 27, 2012 Account number:

Trans date Card nu	date			Amount(\$)	
Nov 29	Dec 03	VIT YMQ/Durham Travel MONTREAL QC		122.00	
Nov 29	Dec 03	LUFTHANSA 2202528225065WILLOWDALE ON	Transportation	7,836.2	
	Dec 04	LUFTHANSA 2202528225005WILLOWDALE ON		7,836.2	
Nov 29	Dec 04	LUFTHANSA 2202528225067WILLOWDALE ON	Transportation	7,830.2	
Nov 29	Dec 04	LUFTHANSA 2202528225067WILLOWDALE ON			
Nov 29	Dec 04	LUFTHANSA 2202528225069WILLOWDALE ON	Transportation Transportation	7,836.25	
	Dec 04	LUFTHANSA 2202528225069WILLOWDALE ON	Transportation	7,836.25	
Nov 29 Nov 29	Dec 04 Dec 04	***************************************	Transportation	7,836.25	
************	******	LUFTHANSA 2202528225071WILLOWDALE ON		7,836.25	
Nov 29	Dec 11	LUFTHANSA 2202528225065WILLOWDALE ON	Transportation	-955.11	
Nov 29	Dec 11	LUFTHANSA 2202528225066WILLOWDALE ON	Transportation	-955.11	
Nov 29	Dec 11	LUFTHANSA 2202528225067WILLOWDALE ON	- Transportation	-955.11	
Vov 29	Dec 11	LUFTHANSA 2202528225068WILLOWDALE ON	Transportation	-955.11	
Vov 29	Dec 11	LUFTHANSA 2202528225069WILLOWDALE ON		-955.11	
Vov 29	Dec 11	LUFTHANSA 2202528225070WILLOWDALE ON		-955.11	
vov 29	Dec 11	LUFTHANSA 2202528225071WILLOWDALE ON	- Transportation	-955.11	
Nov 30	Dec 03	APL*APPLE ITUNES STORE 800-676-2775 ON	Hotel, Entertainment and Recreation	100.00	
lov 30	Dec 03	APL*APPLE ITUNES STORE 800-676-2775 ON	🛬 Hotel, Entertainment and Recreation	19.99	
lov 30	Dec 03	POITIN STILL RATHCOOLE DUB 933.00 EUR @ 1.327995713**	Foreign Currency Transactions	1,239.02	
lov 30	Dec 03	DURHAM FUELS BOWMANVILLE ON	- Transportation	528.44	
lov 30	Dec 03	BROAD CONNECT TELECOM VAUGHAN ON	Personal and Household Expenses	226.00	
Dec 01	Dec 03	CCHLP.COM 8008767427 NY 107.40 USD @ 1.020204842**	Foreign Currency Transactions	109.57	
Dec 01	Dec 04	WEIR & SON DUNDRUM LTD DUNDRUM	Retail and Grocery	50,589.63	
ec 03	Dec 04	APL*APPLE ITUNES STORE 800-676-2775 ON	Hotel, Entertainment and Recreation	36.10	
Dec O3	Dec 04	AIR CANADA 0142115034820WINNIPEG MB		-6,125.94	
ec 03	Dec 04	AIR CANADA 0142115034821WINNIPEG MB	Transportation	-6,125.94	
ec 03	Dec 04	AIR CANADA 0142115034822WINNIPEG MB	Transportation	-6,125.94	
ec 03	Dec 04	AIR CANADA 0142115034823WINNIPEG MB	- Transportation	-6,125.94	
ec 03	Dec 04	AIR CANADA 0142115034824WINNIPEG MB		-6,125.94	
ec 03	Dec 04	AIR CANADA 0142115034825WINNIPEG MB		-6,125.94	
iec 03	Dec 05	AIR CHARTER SERVICE 516-4325900 NY 48,742.00 USD @ 1.020672521**	Foreign Currency Transactions	49,749.62	
ec 03	Dec 05	AIR CANADA 0142115161694WINNIPEG MB	Transportation	150.00	
ec 03	Dec 05	AIR CANADA 0142115161694WINNIPEG MB		664.00	
	Dec 05			200.00	
ec 04	Dec 05	OSHAWA JEWELLERY EXCHANGEOSHAWA ON	Retail and Grocery	8,846.19	
ec 04	Dec 05	SILVERIS TECHNOLOGIES COR905-6267299 ON	Personal and Household Expenses	11.29	
ec 04	Dec 06	REPUTATIONGUARD.CA 4163711031 ON	Professional and Financial Services	4,520.00	
ec 04	Dec 06	AIR CANADA 0142115200665WINNIPEG MB		157.50	
ec 04	Dec 06	AIR CANADA 0142115200665WINNIPEG MB		570.00	
ec 04	Dec 06	ECONOMICAL MUTUAL INS CO WATERLOO ON	Professional and Financial Services	304.00	
ec 05	Dec 06	HOSTGATOR 7135745287 TX	Professional and Financial Services	15.33	
ec 05	Dec 06	BESTBYTE WHITBY ON	Home and Office Improvement	10.963.94	
ec 05	Dec 06	BESTBYTE WHITBY ON	Home and Office Improvement	4,769.05	
				1,700.00	

Your new charges and credits (continued)



704

Tab P

SELFRIDGES

1 Exchange Squarê Manchester M3 1BD Freephone 0800 123 400 (From overseas + 44 113 369 8040) www.selfridges.com V.A.T NO. GB 705 3259 52

705

Sales voucher

You were served by: Attila 987 DAVID MORRIS HV 1 @ f23000.00 987 DAVID MORRIS HV 1 @ f3110.00 Total

tems

2

f3,110.00 f26,110.00 f11200.00

£14910.00

£23,000.00

Number : PAN Seq : AID :	98631622	CHIP
CARD TOTAL :	f1	1,200.00

Please debit my account

Cardholder PIN Verified

Number : PAN Seg :	Visa Credit ************************************	CHIP
Cryptogram :	A0000000031010 40/849B38B14C700C21	
Auth Code : Merchant ID:	98631622	
Terminal ID:		
CARD TOTAL :	£14	,910.00

Please debit my account

Cardholder PIN Verified

General Manager - Jane Sharrocks

Notified terms and conditions apply

For details visit selfridges.com/exchange

We have a passion for what we do and want you to have an amazing experience every time you come to Selfridges.

We'd really appreciate hearing what you thought of shopping here today by logging onto selfridges.com/spotlight As a thank you, you will be entered into a draw to win a £1000 gift card this month!

Shop online at www.selfridges.com

You are welcome to exchange or refund your purchases by Tue 12 Mar 2013

Term 0749 Opr 9001813320 Trans 1480 Store 009001 Date 26/02/13 18:08

14



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		DN
MR. MRS. MS.		
ADDRESS: 15 5	Carlow Court	0 12 (1
TOWN: Whitby		LIN 977
	stellarpoint.ca	89-316-0507 PASSED ON TO ANY THIRD PARTIES INFORMATION FROM DM LONDON.
	DESCRIPTION	*PRICE
STOCK NO SASS	BEFITLING SUPPEROC	FARIGUT +3110.00
STOCK NO. 235358 MODEL NO. 235358 SOL. PS. NSL.RX SERIAL NO.	HUBLOT BIGBANG	423.000
STOCK NO. MODEL NO. SERIAL NO.	107+2	七之6,110
	*ALL RETAIL VALUES INCLUDE VA	

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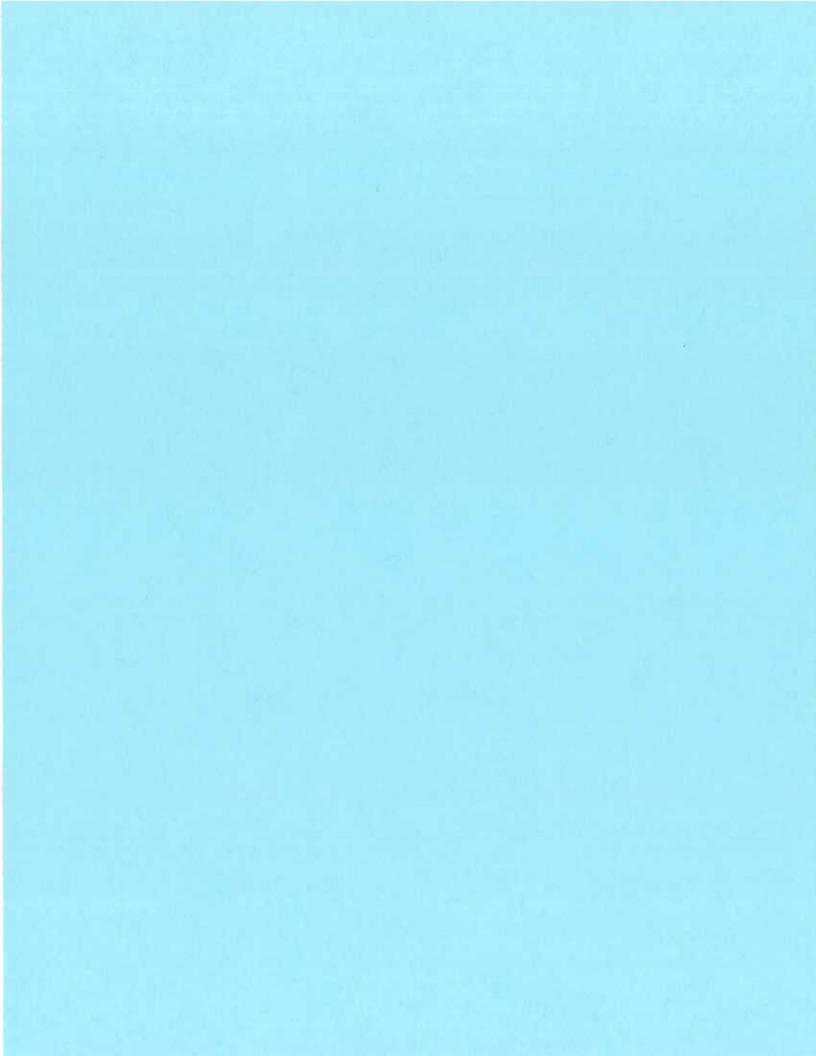
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-ALL RETAIL VALUES INCLUDE VAT DM LONDON LIMITED REGISTERED IN ENGLAND: 5209185 VAT NO: 844 0066 48 REGISTERED OFFICE: 1ST FLOOR. 16 DUFOUR'S PLACE. LONDON. W1F 7SP





Prepared for: MR RAJIV DIXIT January 28 to February 27, 2013 Account number:

Your new charges and credits (continued)

Trans date	Post date	Description	Spend Categories	Amount(\$
Card nu	······································		Spend caregones	Amount(a
Feb 15	Feb 19	EXPEDIA * TRAVEL 800-367-3476 ON	- Transportation	81.00
Feb 15	Feb 19	MCGREGOR SOCKS NIAGARA FALLSON	Retail and Grocery	90.83
Feb 15	Feb 19	TOYS R US #3590 NIAGARA FALLSON	Retail and Grocery	57.85
Feb 15	Feb 19	TOYS R US #3590 NIAGARA FALLSON	Retail and Grocery	55.31
Feb 15	Feb 19	TOMMY HILFIGER #3701 NIAGARA FALLSON	Retail and Grocery	438.52
Feb 15	Feb 19	FV INDOOR WATERPARK NIAGARA FALLSON	Be Hotel, Entertainment and Recreation	542.86
Feb 15	Feb 19	FV INDOOR WATERPARK NIAGARA FALLSON	Hotel, Entertainment and Recreation	18.37
Feb 15	Feb 19	FV INDOOR WATERPARK NIAGARA FALLSON	Hotel, Entertainment and Recreation	88.28
Feb 15	Feb 19	FV INDOOR WATERPARK NIAGARA FALLSON	B Hotel, Entertainment and Recreation	-40.00
Feb 15	Feb 19	I.H.O.P. NIAGARA FALLSON	Restaurants	183,28
Feb 15	Feb 19	PRESTIGE HOTEL VERNON VERNON BC	Hotel, Entertainment and Recreation	100.00
Feb 15	Feb 19	BRITISH A 1253204719993QUEBEC QC	- Transportation	2,364.09
Feb 16	Feb 19	APPLE ONLINE STORE 800-676-2775 ON	Home and Office Improvement	535.62
Feb 16	Feb 19	APPLE ONLINE STORE 800-676-2775 ON	Home and Office Improvement	12,348.64
Feb 16	Feb 19	WAL-MART SUPERCENTER#3160NIAGARA FALLSON	Retail and Grocery	160.74
Feb 17	Feb 19	HILTON NIAGARA FALLS F NIAGARA FALLSON	Hotel, Entertainment and Recreation	1,058.68
Feb 17	Feb 19	HILTON NIAGARA FALLS F NIAGARA FALLSON	Hotel, Entertainment and Recreation	807.60
Feb 17	Feb 19	HILTON NIAGARA FALLS F NIAGARA FALLSON	Hotel, Entertainment and Recreation	783.35
Feb 18	Feb 19	STANDARD PARKING OSHAWA ON	Professional and Financial Services	9.00
eb 19	Feb 20	CORPORATN/IC 3834556 OTTAWA ON	Professional and Financial Services	200.00
eb 19	Feb 22	WESTJET 0003204812877 CALGARY AB	Transportation	197.25
Feb 20	Feb 21	EXPEDIA*TRAVEL 800-367-3476 ON	Transportation	138.00
eb 20	Feb 21	SITE5.COM WEB HOSTING 888-748-3526 CO 76.45 USD @ 1.044342708**	Foreign Currency Transactions	79.84
eb 21	Feb 25	COAST VICTORIA HARBOURSIDVICTORIA BC	Hotel, Entertainment and Recreation	655.20
ер 21	Feb 25	USAIR 0373204878580ENFIELD NS	Transportation	1,219,29
eb 21	Feb 25	USAIR 0373204878581ENFIELD NS	Transportation	1,219.29
eb 21	Feb 25	USAIR 0373204878582ENFIELD NS	Transportation	1,219.29
eb 22	Feb 25	SITE5.COM WEB HOSTING 888-748-3526 CO 165.45 USD @ 1.051435479**	Foreign Currency Transactions	173.96
eb 22	Feb 25	PRESTIGE HOTEL VERNON VERNON BC	Hotel, Entertainment and Recreation	179.16
еб 24	Feb 25	THE CIRCLE CLUB M'STER M3 2 1,910.00 GBP @ 1.606586387**	Foreign Currency Transactions	3,068.58
eb 25	Feb 26	BIN THERE DUMP THAT WHITBY ON	Home and Office Improvement	365.72
eb 25	Feb 26	SCI VENDING CARTS MISSISSAUGA ON	Professional and Financial Services	4.00
eb 25	Feb 26	SCI VENDING CARTS MISSISSAUGA ON	Professional and Financial Services	4.00
eb 25	Feb 26	BROAD CONNECT TELECOM VAUGHAN ON	Personal and Household Expenses	135.60
eb 26	Feb 27	THE PHILLIP JAMES MANCHESTER 6,916.00 GBP @ 1 599960960**	Foreign Currency Transactions	11,065.33
eb 26	Feb 27	SELFRIDGES MANCHESTER MCHSTR EXCHAN 14,910.00 GBP @ 1.599960429**	Foreign Currency Transactions	23,855.41
otal for				\$214,583.73
ard nur	nber			
eb 01	Feb 04	AFRIHOST.COM RIVONIA 399.00 ZAR @ 0.116791980**	Foreign Currency Transactions	46.60

** Denotes transaction in foreign currency

-120-058749

Page 5 of 6

Tab Q

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SALES REC Customer co	
World Duty F VAT Reg No : GB9 Heathrow Termina For Customer Suppo +44 (0)1784 47 Flight Code: BA 0099 Toronto	74870960 1 5 Main rt - call
1003128351 THE JOHN WALKER	£2,500.00
Total 1 Items Delta You could have earned Wo on-line at www.baawor	
Card : Visa Number : **********0461 Pan Seq : 01 AID A000000031010 07/03/13 31 Cryptogram : 40/41AA32C4 Expiry Date : 03/16	./03/16
Auth Code : 002820 Merchant ID : ********* Terminal ID : ****1343	*****48451
GOODS TOTAL:	£2,500.00

Please Debit my Account as shown

Cardholder PIN Verified

Please retain for your records



TRAVELLING TO A FINAL DESTINATION OUTSIDE THE EU? You may have to pay tax on purchases you bring back to the UK.

Follow us on Twitter @WorldDutyFree

On your return flight place all liquids over 100ml in your hold luggage

You were served by		S.Parma	
Store No 000150 Till	No	0013 Trans	No 4432
Date 18)4/13		Time	13:58

SALES RECEIPT Customer copy -----------World Duty Free VAT Reg No Heathro Jerminal 5 Main For Customer Support - call +44 (0)1784 475 509 Flight Code: BA 0099 Toronto 1003085115 MACALLAN 1824 LTD £1,800.00 -----------Total 1 Items £1,800.00 sa CAD2,906.1 Exchange rate: CAD1.6145/£ -£1,800.00 Visa You could have earned WorldPoints. Apply on-line at www.baaworldpoints.com Card : Visa Credit Number : *********4253 Pan Seq : 01 CHIP A000000031010 AID 01/01/13 31/05/15 Cryptogram : 40/36E1ABB2A0FD709B Expiry Date : 05/15 : 007677 Auth Code Merchant ID : ****************************48451

Terminal ID : ****1343 Exchange Rate: CAD1.6145/£

GOODS TOTAL:

£1,800.00

TRANSACTION CURRENCY: CAD2, 906.10

Cardholder has chosen to pay in CAD. This transaction is based on REUTERS WHOLESALE INTERBANK exchange rate plus 2.75% international conversion margin.

This is not an additional fee and replaces currency conversion charges normally applied.

I accept that I have been given a choice of currencies for payment. My choice is final. Transactions can also be conducted in GBP.

The currency conversion service is provided by Barclaycard Business.

Please Debit my Account as shown

Cardholder PIN Verified

Please retain for your records

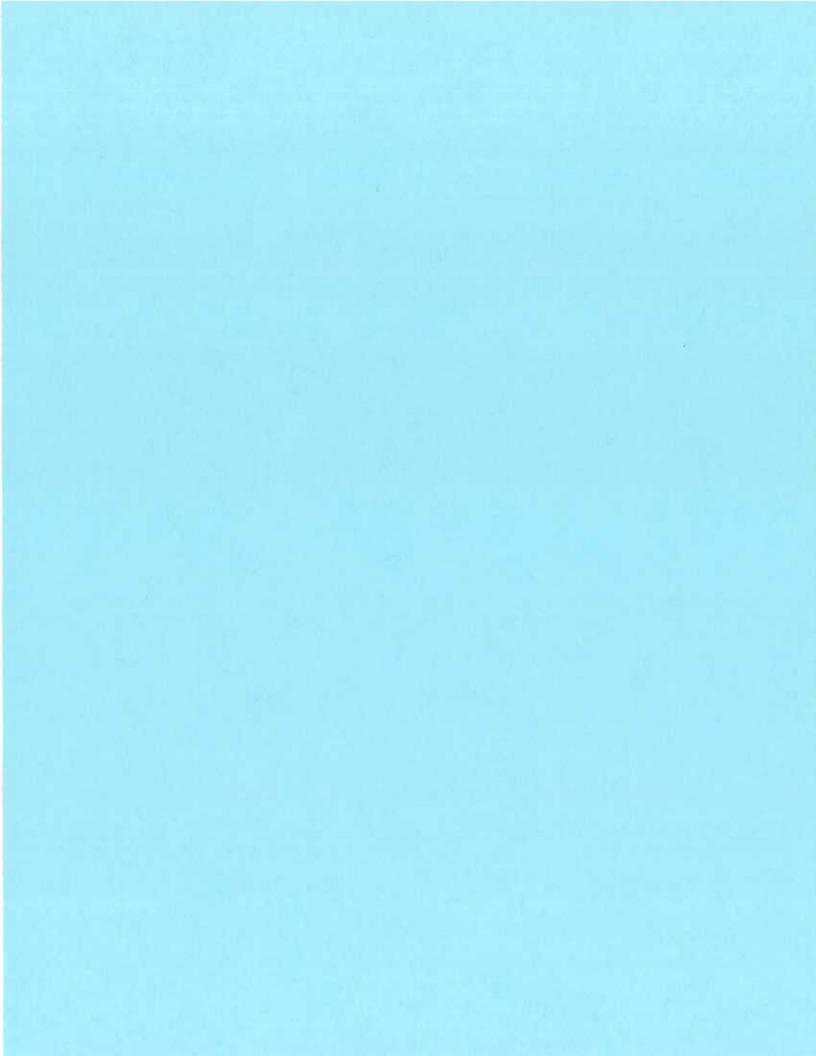


TRAVELLING TO A FINAL DESTINATION OUTSIDE THE EU? You may have to pay tax on purchases you bring back to the UK.

Follow us on Twitter @WorldDutyFree

On your return flight place all liquids over 100ml in your hold luggage

You were served by S.Parmar Store No 000150 Till No 0013 Trans No 4433 Date 18/04/13 Time 14:00



Trans date	Post date	Description	
Card n	umber		
Apr 11	Apr 15	HILTON MANCHESTER 5,221.45 GBP @ 1.597408766**	
Apr 12	Apr 12	CASH ADV/BT/CONV CHQ FEE	
Apr 12	Apr 12	NETFLIX.COM 866-716-0414 ON	••••••
	******************	***************************************	
Apr 12	Apr 15	NMC*NAMECHEAP COM 323-3752822 CA 21.74 USD @ 1.040018399**	
Apr 12	Apr 15	TAJ VIVANTA -CASH BANGALORE	
Apr 13	Apr 15	APL*APPLE ITUNES STORE 800-676-2775 ON	*******
Apr 13	Apr 15	LAXMI GEMS AND CRAFT TRIVANDRUM	
Apr 13	Apr 15	STAR ARTS TRIVANDRUM	
Apr 13	Арг то	7,100.00 INR @ 0.019156338**	
Apr 13	Apr 15	WWW.VENDOSUPPORT.COM +18777773758	
		102.86 USD @ 1.040248882**	
Apr 13	Apr 15	WWW.VENDOSUPPORT.COM +18777773758 1.93 USD @ 1.041450777**	
Apr 14	Apr 15	LAXMI GEMS & CRAFT TRIVANDRUM	
		24,300.00 INR @ 0.019155967**	
Apr 14	Apr 15	ZRV*ZURVITA 713-4645002 TX	
*********	******	105.79 USD @ 1.040268456**	
Apr 14	Apr 15	SCI VENDING CARTS MISSISSAUGA ON	
Apr 15	Apr 16	TURTLE ON THE BEACH GP TRIVANDRUM 15,759.00 INR @ 0.019308966**	
Apr 15	Apr 16	LLADRO BANGALORE 82,000.00 INR @ 0.019308902**	
Apr 15	Apr 16	***************************************	•••••
Apr 15	Apr 16	LOUIS VUITTON BANGALORE 232,500.00 INR @ 0.019308860**	
Apr 15	Apr 16	TITAN INDUSTRIES LIMIT BANGALORE	
		434,373.00 INR @ 0.019308866**	
Apr 15	Apr 17	TUMI BANGALORE	******
		280,500.00 INR @ 0.019427380**	
Apr 16	Apr 17	ANAND COMPUTERS BANGALORE	
		389,597.00 INR @ 0.019427383**	
Apr 16	Apr 17	LOUIS VUITTON BANGALORE	
		183,000.00 INR @ 0.019427377**	
Apr 16	Apr 17	WWW.VENDOSUPPORT.COM +18777773758 30.63 USD @ 1.050930460**	
Apr 17	Apr 18	THE AMBIENCE BANGALORE	
		845,000.00 INR @ 0.019615172**	
Apr 17	Apr 18	LIFE STYLE INTERNATION BANGALORE	
		11,686.00 INR @ 0.019614924**	
Apr 17	Apr 19	T G I FRIDAYS BANGALORE	
Apr 17	A 72	20,905.00 INR @ 0.019547477**	
Apr 17	Apr 22		
Apr 18	Apr 19	BIN THERE DUMP THAT WHITBY ON	
Apr 18	Apr 19	WORLD DUTY FREE EUROPE HEATHROW	
Apr 18	Apr 22	NGIPL BANGALORE 21.00 USD @ 1.052857143**	
Apr 18	Apr 22	THE OBEROI-BANGALORE F BANGALORE	
Apr 19	Apr 22	51*FATHEAD.COM TORONTO ON	
Apr 19	Apr 22	MERCEDES-BENZ DURHAM WHITBY ON	
Apr 19	Apr 22	PRECISE PARKLINK INC TORONTO ON	
Apr 20	Apr 22	TARGET CANADA T3767 WHITBY ON	
Apr 20	Apr 22	FLIGHT CENTRE 43300 TORONTO ON	
Apr 20	Apr 22	EMPIRE THEATRES #47 WHITBY ON	******

Sp	end Categories	Amount(\$)
()	Foreign Currency Transactions	8,340.79
B	Professional and Financial Services	5.00
B	Professional and Financial Services	7.99
•	Foreign Currency Transactions	22.61
16 (1)	Hotel, Entertainment and Recreation	217.67
1. 1.	Hotel, Entertainment and Recreation	11.29
n	Retail and Grocery	233.13
•	Foreign Currency Transactions	136.01
•	Foreign Currency Transactions	107.00
۲	Foreign Currency Transactions	2:01
۲	Foreign Currency Transactions	465.49
•	Foreign Currency Transactions	110.05
	Professional and Financial Services	4.00
۲	Foreign Currency Transactions	304.29
۲	Foreign Currency Transactions	1,583.33
۲	Foreign Currency Transactions	4,489.31
۲	Foreign Currency Transactions	8,387.25
۲	Foreign Currency Transactions	5,449.38
•	Foreign Currency Transactions	7,568.85
	Foreign Currency Transactions	3,555.21
æ	Foreign Currency Transactions	32.19
٠	CONTRACT MALE STATEMENT IN A REAL MALE AND A REAL AND A	16,574.82
۲	Foreign Currency Transactions	229.22
®	Foreign Currency Transactions	408.64
- 	Hotel, Entertainment and Recreation	9.635.82
2	Home and Office Improvement	318.49
Û	Retail and Grocery	2,906.10
۲	Foreign Currency Transactions	22.11
9 ₆	Hotel, Entertainment and Recreation	49.59
	Professional and Financial Services	570.39
	Transportation	
~ ~	Transportation	9.00
1	Retail and Grocery	91.48
	ransponation	3,039.70
10	Hotel, Entertainment and Recreation	35.50

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Tab R

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CHÂTEAU D'IVOIRE Depuis 1978 · Since 1978 2020 rue de la Montagne, Montréal, Québec, Canada H3G 127 Tél.: (514) 845-4651 Fax: (514) 281-9925 www.chateaudivoire.com Nom Name LATIN DIXIT Rue Street 1636 COYSTON CRF Ville City Code postale Postal Code DEALSUA ON LIK 3CA Courriel E-mail: 257 - 316 - 0507 Montant Amount 1 UNTEA UNDEL 00 8 - 50235 1 USTA UNDEL 008 - 50256 1 UNTEA LINDEL 008 - 50256 1 UNTEAL
$\begin{array}{c c} \hline Depuis 1978 \cdot Since 1978 \\ \hline 2020 rue de la Montagne, Montréal, Québec, Canada H3G 127 Tél.: (514) 845-4651 Fax: (514) 281-9925 \\ \hline WWW.chateaudivoire.com \\ \hline Nom Name & Date \\ \hline LoT IV DIXIT & Id SZ2013 \\ \hline Rue Street & Id SZCO TSTON CLIT \\ \hline Ville City & Code postale Postal Code \\ \hline DSHAWA & ON & LIK 3CA \\ \hline Courriel E-mail: & Tél. \\ \hline ZET - 516 - 0507 \\ \hline Montant Amount \\ \hline Montant Amount \\ \hline Montant Amount \\ \hline Mos TrA & WIDEL \\ \hline 008 - 5075C \\ \hline \end{array}$
2020 rue de la Montagne, Montréal, Québec, Canada H3G 127 Tél.: (514) 845-4651 Fax: (514) 281-9925 www.chateaudivoire.com Nom Name $\begin{array}{cccccccccccccccccccccccccccccccccccc$
Nom Name lastin V Dixit Rue Street 1036 C07572N clip Ville City $05645WA$ GN $L1/L 3c4Courriel E-mail:10367 - 316 - 0507Montant Amount1057c4 WinDel 058 - 50255058 - 502553770 cs$
$\begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\ \\$
Rue Street 103C COTSTON CRT Ville City Code postale Postal Code $OSHSWA ON LIK 3c4Courriel E-mail: Tél.259-316-0507Qté Qty Description Montant Amount1 WATCA WINDEL 3970 OD 008-5025C 3770 c$
$ \begin{array}{cccccccccccccccccccccccccccccccccccc$
Ville City Code postale Postal Code $\partial \leq \mathcal{A} < \mathcal{A} \leq \mathcal{A} < \mathcal{A} \leq \mathcal{A} < \mathcal$
$\begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} \begin{array}{c} $
Courriel E-mail: Z = 5 - 5/6 - 0.507 Q té Q ty Description Montant Amount $I = 0.5724 Corr D = 0 3.9750 0000 = 8 - 50 235I = 0.57256 3.9770 000$
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$
Qté Qty Description Montant Amount 1 $UATCA$ $UIDEL$ 00 $E-50235$ 1 $UATCA$ $UIDEL$ 1 $UATCA$ $UIDEL$ 00 $E-5025C$ 3770 $C0$ 3770 $C0$
00 8-50235 1 WS 724 W, DEC 3790 00 008-50256
00 8-50235 1 WS 724 W, DEC 3790 00 008-50256
1 WS 724 W, DEG 3790 00 008-50256 3790 00
and the last
002-652/5
, 16 BLOT CLOCK 7305 94
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다. 이 전화가 있는 것이 가 있는 것이 있습니다. 이 것이 가 있는 것이 가 있는 것이 있다. 이 것이 있는 것이 있는 것이 있는 것이 있는 것이 있는 것이 있는 것이 없다. 이 것이 있는 것이 없는 것이 없는 것이 없는 것이 없는 것이 없는 것이 없는 것이 없다. 이 있는 것이 없는 것이 없다. 이 있는 것이 없는 것이 없다. 이 있는 것이 없는 것이 없다. 것이 없는 것이 없다. 것이 없는 것이 없다. 것이 없는 것이 없다. 것이 없는 것 것이 않아, 것이 없는 것이 없이 않이
Comptant Cash Chèque Livraison-Assurance Shipping-Insurance
Master Card Visa Sous-Total 19095 94
Amex Débit Taxe TPS/GST 103450441RT0001 954 EO
Autre Other Certificate cadeaux Taxe TVQ/QST Gift Certificate 1001287466TQ0005 /954 82
Identification Total 2195462.
Deposit
Balance Pas de remboursement, Échange seulement dans les divisions auss acts fonture
Pas de remboursement - Echange seulement dans les dix jours avec cette facture. No Refund - Exchange only within ten days with this bill.
Par - By Mi cht C Signature du client - Customer's Signature
R 66555 Facture Invoice

CHATEAU D IVOIRE 2020 RUE DE LA MONTAGNE MONTREAL QC H3G 127 5148454651

SALE

MID: 4171313	
TID: 04171313	REF#: 00000005
Batch #: 046	SEQ: 046001001005
05/10/13	15:41:03
	CVC: Y
APPR CODE: VISA	031303
***********425	3C **/**

AMOUNT \$21,954.62

00 - APPROVED - 001

Visa Credit AID: A000000031010 TVR: 00 00 00 80 00 TSI: F8 00

CUSTOMER COPY

Your new charges and credits (continued)

Trans date	Post date	Description
Card n	umber	
May 06	May 07	BROAD CONNECT TELECOM VAUGHAN ON
May 06	May 07	FUTURE SHOP #613 OSHAWA ON
May 06	May 07	CORPORATN/IC 3937436 OTTAWA ON
May 06	May 08	EVOLV HEALTH CANADA INC BRANDON MB
May 06	May 08	METRO #106 WHITBY ON
May 06	May 09	UNITED AIR 0163925842597CONTINENTAL NS
May 07	********************	APL*APPLE ITUNES STORE 800-676-2775 ON
	May 08	TAKATO ANA MATATO DI PARTA ANG KANANGKANA MANANGKANA ANA MANANGKANA ANA MANANGKANA ANA MANANGKANA ANA MANANGKAN
May 08	May 09	
May 08	May 09	WHITBY CHAMBER OF COMMERC905-668-4506 OF
May 08	May 09	WORLD VISION CANADA MISSISSAUGA ON
May 08	May 09	ACC SOUVENIRS TORONTO ON
May 08	May 09	PINNACLE CATERERS LTD. TORONTO ON
May 08	May 10	HOLIDAY INN HAMILTON PLACCHATTANOOGA TN
11. 00		144.22 USD @ 1.034461240**
May 08	May 10	NIAGARA AIRBUS NIAGARA FALLSON
May 08	May 23	NAUTILUS BOWFLEX CANADA WVANCOUVER WA
May 09	May 10	APL*APPLE ITUNES STORE 800-676-2775 ON
May 09	May 10	APL*APPLE ITUNES STORE 800-676-2775 ON
May 09	May 10	CENTRE BELL KIOSQUES MONTREAL QC
May 09	May 10	CENTRE BELL KIOSQUES MONTREAL QC
May 09	May 10	THE BUSINESS EXCHANGE MARKHAM ON
May 09	May 13	TORONTO RSD PARKING TORONTO ON
May 09	May 13	SWAROVSKI MARKHAM ON
May 09	May 13	DURHAM AVIATION SERVICES OSHAWA ON
May 09	May 13	IL CAMPARI CENTRO MONTREAL QC
May 10	May 13	VAN BELLE FLOWERS WHITBY ON
May 10	May 13	CHATEAU D'IVOIRE MONTREAL QC
May 10	May 13	VASCO MONTREAL QC
May 10	May 13	SAQ23113 SIGNATURE-MON MONTREAL QC
May 10	May 13	MTO RUS - SO ECHANNEL STONEY CREEK ON
May 10	May 13	MTO RUS - SO ECHANNEL STONEY CREEK ON
May 10	May 14	IL CAMPARI CENTRO MONTREAL QC
May 11	May 13	WHITBY AUDIO VIDEO WHITBY ON
May 11	May 13	BUILD A BEAR WORKSHOP 2050SHAWA ON
May 11	May 13	FUTURE SHOP #613 OSHAWA ON
May 11	May 13	HOME OUTFITTERS #5134 OSHAWA ON
May 11	May 13	LONG & MCQUADE OSHAWA ON
		BIN THERE DUMP THAT WHITBY ON
May 11	May 13	
May 11	May 13	
May 11	May 13	LE CRYSTAL DE LA MONTA MONTREAL QC
May 11	May 13	LE CRYSTAL DE LA MONTA MONTREAL QC
May 11	May 14	LE CRYSTAL DE LA MONTA MONTREAL QC
May 12	May 13	NETFLIX.COM 866-716-0414 ON
May 12	May 13	ECWID, INC 800-6577957 CA 35.00 USD @ 1.040285714**
May 14	May 15	ZRV*ZURVITA 713-4645002 TX 105.79 USD @ 1 044049532**
May 14	May 15	APL*APPLE ITUNES STORE 800-676-2775 ON
May 14	May 15	ADZERK 9196000742 NC
		30.00 030 @ 1.044000000
May 14	May 15	50.00 USD @ 1.044000000** MACDONALD SAGER MANIS LLPTORONTO ON

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Spo	end Categories	Amount(\$)
Ť	Personal and Household Expenses	135.60
ア	Home and Office Improvement	440.62
E	Professional and Financial Services	200.00
0	Retail and Grocery	1,505.14
Û	Retail and Grocery	36.96
	Transportation	462.91
ан _р	Hotel, Entertainment and Recreation	2.28
7	Home and Office Improvement	301.31
Ť	Personal and Household Expenses	35.01
ŕ	Personal and Household Expenses	1,000.00
¹⁶ B	Hotel, Entertainment and Recreation	192.07
12	Restaurants	2,527.67
۲	Foreign Currency Transactions	149.19

-	Transportation	89.00
÷.,	Hotel, Entertainment and Recreation	4,031.81
i.	Hotel, Entertainment and Recreation	13.53
۳,	Hotel, Entertainment and Recreation	15.78
Û	Retail and Grocery	1,650.00
Û	Retail and Grocery	775.00
	Professional and Financial Services	1,695.00
B	Professional and Financial Services	32.00
Û	Retail and Grocery	130.00
-÷+	Transportation	8,053.51
<i>!</i> ;•	Restaurants	160.31
ア	Home and Office Improvement	200.00
e	Retail and Grocery	21,954.62
Ü	Retail and Grocery	885.31
	Retail and Grocery	2,575.95
B	Professional and Financial Services	82.00
B	Professional and Financial Services	82.00
?	Restaurants	167.44
50	Hotel, Entertainment and Recreation	4,647.31
Û	Retail and Grocery	153.12
2	Home and Office Improvement	875.51
Û	Retail and Grocery	322.03
٥	Retail and Grocery	2,632.31
7	Home and Office Improvement	275.55
۲	Retail and Grocery	11,568.45
-	Hotel, Entertainment and Recreation	2,323.21
т. С	Hotel, Entertainment and Recreation	87.90
2	Hotel, Entertainment and Recreation	500.00
	Professional and Financial Services	7.99
*	Foreign Currency Transactions	36.41
	Foreign Currency Transactions	110.45
- -	Hotel, Entertainment and Recreation	3.37
*	Foreign Currency Transactions	52.20
1	Professional and Financial Services	5,889.72
Ô	Retail and Grocery	1,172.88

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IsactionHistory.faces	https://newdb.banko Bank of Cyprus	https://newdb.bankofcyprus.com/netteller/TransactionHistory.f		
Transaction History	06/03/2013 3.21 AM		712	
Account Details	Last Transactions:			
Account Owner: BANNERSBROKER LIMITED Available Balance: 283961.15 USD Current Balance: 295107.42 USD	From Date: 06/03/2012 To Date: 06/03/2013			
tank teference Post Date Value Date Description lumber	Transaction Number	Debit	Credit Indicative Balance	
"AB" COMMISS 13030501621 05/03/2013 05/03/2013 05/03/2013 ref FT130305356	ST our	6.52	295,107.42	
ng services invoi number 0134	ionsulti se	100,000.00	295,113.94	
Card 4***1601 20 02 19000.00 CAL 13030401046 53459 04/03/2013 04/03/2013 VISA CA TORON Harry Rosen F00) Auth 87560 TO	19,223.34	395,113.94	
3030401621 04/03/2013 04/03/2013 CHARGES OUR 343 FT13030400180.		13.02	414,337.28	
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				actpour new actountore of pro-	in worth neeronon in under	iom nator yrages
Bank Reference Number	Post Date	Value Date	Description	Transaction Number	Debit Cri	edit Indicative Balance
113030401821 223193		04/03/2013	TRANSFER COMMISSION our ref FT13030400180ACY		15.00	414,350.30
113030401621 223191	04/03/2013	04/03/2013	PROCESSING FEES our ref FT13030400180ACY OUTWARD		15.62	414,365.30
113030401621 22341	04/03/2013	04/03/2013	DE TIJ 3030400180ACY to MR JAIME PEREIRA DE a/c ICED TO COVER OFFICE EXPENSE		10,000.00	414,380.92
113030401046 84 39471	04/03/2013	04/03/2013	Card 4***1601 2013-02- 28 95.60 CAD Auth 275843 Trace 1267227 VISA CA WHITBY Lux Limo		96.67	424,380.92
113030401046 84 39465	04/03/2013	04/03/2013	Card 4***1601 2013-02- 28 155.80 CAD Auth 277054 Trace 1267229 VISA CA WHITBY Lux Limo		157.54	424,477.59
113030401046 84 39459	4/03/2013	04/03/2013	Card 4***1601 2013-02- 28 117.76 CAD Auth 275472 Trace 1267230 VISA CA WHITBY Lux Limo		119.07	424,635.13
113030401046 ₀ 84 39453	4/03/2013	04/03/2013	Card 4***1601 2013-02- 28 83.20 CAD Auth 276301 Trace 1267228 VISA CA WHITBY Lux Limo		84.12	424,754.20
113030401046 ₀ 84 39447	4/03/2013	04/03/2013	Card 4***1601 2013-02- 28 B000.00 GBP Auth 256185 Trace 1267226 VISA GB T5 HEATHROW Tiffany & Co Ltd		12,580.19	424,638.32

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Bank Reference Post Date Number	Value Date	Description	Transaction Number	Debit	Credit Indicative Balance
113030101046 _{01/03/2013} 84 36613	01/03/2013	Card 4***1601 2013-02- 27 3056.73 GBP Auth 269430 Trace 1211791 VISA GB M/CSTR WH CTY Currys		4,838.40	437,418.51
113030101046 01/03/2013 84 36607	01/03/2013	Card 4***1601 2013-02- 27 58.80 GBP Auth 235494 Trace 1212600 VISA GB MANCHESTER Aba Leisure Ltd Card 4***1601 2013-02-		93.07	442,256.91
113030101046 <i>01/03/2013</i> 84 36601	01/03/2013	27 551.80 GBP Auth 282685 Trace 1211790 VISA GB M/CSTR WH CTY Currys		873.42	442,349.98
113030101046 84 36595	01/03/2013	Card 4***1601 2013-02- 25 76.80 CAD Auth 257558 Trace 1211789 VISA CA QUEBEC British A 1252499142990		78.18	443,223.40
113D301D1046 01/03/2013 84 36589	01/03/2013	Card 4***1601 2013-02- 27 900.00 GBP Auth 235545 Trace 1211792 VISA GB MANCHESTER Aba Leisure Ltd		1,424.58	443,301.58
113030101046 _{01/03/2013} 84 36583	01/03/2013	Card 4***1601 2013-02- 25 400.00 CAD Auth 268363 Trace 1212601 VISA CA QUEBEC British A 1251803822355		407.19	444,726.16
113030101046 01/03/2013 84 36577	01/03/2013	Card 4***1601 2013-02- 26 474.00 GBP Auth 234858 Trace		750.28	445,133.35

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Bank Reference Number	Post Date	Value Date	Description	Transaction Number		Debit	Credit	Indicativa Balance
11303010104 84 36571	⁶ D1/D3/2D13	01/03/2013	1212602 VISA GB MANCHESTER Aba Leisure Ltd Card 4***1601 2013-02- 26 213.00 CAD Auth 268363 Trace 1211788 VISA CA MONTREAL Vit Ymg/Durham Travel	_		216.83		445,883.63
11302280105 81961	28/02/2013	28/02/2013	Statement Charges			4.89		446,100.46
11302280104 84 39145	⁶ 28/02/2013	28/02/2013	Card 4***1601 2013-02- 26 529.20 CAD Auth 234465 Trace 1159920 VISA CA WHITBY Lux Limo			537.59		446,105.35
113022801040 84 39139	⁵ 28/02/2013	28/02/2013	Card 4***1601 2013-02- 24 7196.90 CAD Auth 208095 Trace 1159919 VISA CA QUEBEC British A 1252524765332			7,311.05		446,642.94
113022801046 84 39133	28/02/2013	28/02/2013	Card 4***1601 2013-02- 25 113.00 CAD Auth 268363 Trace 1159915 VISA CA MONTREAL Vit Ymg/Durham Travel			114.79		453,953.99
1130228D1046 84 39127	28/02/2013	28/02/2013	Card 4***1601 2013-02- 26 155.80 CAD Auth 225997 Trace 1159916 VISA CA WHITBY Lux Limo			158.27		454,068.78
113022801046 84 39121	28/02/2013	28/02/2013	Card 4***1601 2013-02- 25 3863.50 CAD Auth 209512 Trace 1159918 VISA CA MONTREAL Vit Ymg/Durham Travel			3,924.77		454,227.05

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| Bank<br>Reference<br>Number           | Post Date  | Value Date |                                                                                                                                 | Transaction<br>Number | Debit    | Credit Indicative<br>Balance |
|---------------------------------------|------------|------------|---------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------|------------------------------|
| 113022801046<br>84 39115              | 28/02/2013 | 28/02/2013 | Card 4***1601 2013-02-<br>24 7195.90 CAD Auth<br>208095 Trace 1159917<br>VISA CA QUEBEC<br>British A<br>1252524765333           |                       | 7,311.05 | 458,151.82                   |
| 113022801045<br>84 39109              | 28/02/2013 | 28/02/2013 | Card 4***1601 2013-02-<br>25 226.00 CAD Auth<br>267920 Trace 1159914<br>VISA CA MONTREAL<br>Vit Ymg/Durham Travel               |                       | 229.58   | 465,462.87                   |
| 113022701046,<br>84 43679             | 27/02/2013 | 27/02/2013 | Card 4***1601 2013-02-<br>25 770.00 GBP Auth<br>263876 Trace 1108834<br>VISA GB MCHSTR<br>EXCHAN Selfridges<br>Manches          |                       | 1,199.13 | 465,692.45                   |
| 113022701046.<br>84 43673             | 27/02/2013 | 27/02/2013 | Card 4***1601 2013-02-<br>25 2302.95 GBP Auth<br>210672 Trace 1108836<br>VISA GB M'STER M3 2<br>The Circle Club                 |                       | 3,586.39 | 466,891.58                   |
| 113022701046<br>84 43667              | 7/02/2013  | 27/02/2013 | Card 4***1601 2013-02-<br>25 Auth 259725 Trace<br>1109649 VISA GB<br>MANCHESTER<br>Selfridges Exch Sq<br>Card 4***1601 2013-02- |                       | 404.23   | 470,477.97                   |
| 113022701046<br>84 43661 2            | 7/02/2013  | 27/02/2013 | 23 1000.00 CAD Auth<br>267920 Trace 1109651<br>VISA CA QUEBEC<br>British A<br>1251803822262                                     |                       | 1,005.32 | 470,882.20                   |
| 113022701046 <sub>2</sub><br>84 43655 | 7/02/2013  | 27/02/2013 | Card 4***1601 2013-02-<br>25 442.40 GBP Auth<br>272175 Trace 1109652<br>VISA GB                                                 |                       | 688.96   | 471,887.52                   |

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| Bank<br>Reference Post Date Value Date Description Transaction<br>Number<br>MANCHESTER Hitton<br>Card 4***1601 2013-02-<br>25 Auth 261876 Trace<br>113022701046<br>27/02/2013 27/02/2013 27/02/2013 1109653 VISA GB | Debit (  | Credit Indica<br>Bala |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------------------|
| Card 4***1601 2013-02-<br>25 Auth 261876 Trace<br>113022701046 27/02/02/49 27/02/02/49 27/02/09 47/02/59 V/50 CP                                                                                                    |          |                       |
| MANCHESTER<br>Selfridges Exch Sq                                                                                                                                                                                    | 3,442.40 | 472,576               |
| Card 4***1601 2013-02-<br>23 500.00 CAD Auth<br>268363 Trace 1109650<br>VISA CA QUEBEC<br>British A<br>1251803822267                                                                                                | 502.67   | 476,018               |
| 84 43637 VISA GB B1068 Living<br>Room                                                                                                                                                                               | 6,018.74 | 476,521.              |
| Card 4***1601 2013-02-<br>25 3728.0D GBP Auth<br>263167 Trace 1108833<br>VISA GB MCHSTR<br>EXCHAN Selfridges<br>Manches                                                                                             | 5,805.61 | 482,540.              |
| Card 4***1601 2013-02-<br>24 813.00 CAD Auth<br>4 31829 26/02/2013 26/02/2013 26/02/2013 208095 Trace 1059399<br>VISA CA<br>MISSISSAUGA Hts                                                                         | 829.57   | 488,345.              |
| 4 39307 VISA GB SALFORD<br>Staples Uk                                                                                                                                                                               | 2,728.76 | 489,175.              |
| Card 4***1601 2013-02-<br>21 113.00 CAD Auth<br>13022501046 25/02/2013 25/02/2013 225991 Trace 9976164<br>4 91119 VISA CA MONTREAL<br>Vit                                                                           | 115.38   | 501,904,2             |

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| Bank<br>Reference<br>Number | Post Date               | Value Date | Description                                                                                                                               | Transaction<br>Number | Debit     | Credit Indicat<br>Balar |
|-----------------------------|-------------------------|------------|-------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------|-------------------------|
| 11302250104<br>84 91113     | <sup>5</sup> 25/02/2013 | 25/02/2013 | Ymq/Durham Travel<br>Card 4***1601 2013-02-<br>20 965.94 CAD Auth<br>280162 Trace 9976162<br>VISA CA QUEBEC<br>British A<br>1253204834678 |                       | 986.30    | 502,019.                |
| 11302250104<br>84 91107     | <sup>5</sup> 25/02/2013 | 25/02/2013 | Card 4***1601 2013-02-<br>20 1654.93 CAD Auth<br>279855 Trace 9976163<br>VISA CA QUEBEC<br>British A<br>1253204832540                     |                       | 1,689.82  | 503,005.1               |
| 113022501048<br>84 91101    | 25/02/2013              | 25/02/2013 | Card 4***1601 2013-02-<br>21 172.80 CAD Auth<br>242262 Trace 9976161<br>VISA CA WHITBY Lux<br>Limo                                        |                       | 176.45    | 504,695.7               |
| 113022501046<br>54 37453    | 25/02/2013              | 25/02/2013 | Card 4***1601 2013-02-<br>20 4703.47 GBP Auth<br>278223 Trace 9921555<br>VISA GB HOUNSLOW<br>British<br>Altw12528863494                   |                       | 7,460.74  | 504,872.1               |
| 13D225D1D46<br>34 37447     | 25/02/2013              | 25/02/2013 | Card 4***1601 2013-02-<br>20 267.80 GBP Auth<br>280994 Trace 9921556<br>VISA GB India Jet Air<br>5893030815973                            |                       | 424.79    | 512,332.9               |
| 13022501046<br>4 37441      | 25/02/2013              | 25/02/2013 | Card 4***1601 2013-02-<br>20 267.80 GBP Auth<br>280994 Trace 9921557<br>VISA GB India Jet Air<br>5893030815972                            |                       | 424.79    | 512,757.7               |
| 13022501046<br>4 37435      | 25/02/2013              | 25/02/2013 | Card 4***1601 2013-02-<br>21 10809.66 GBP                                                                                                 |                       | 17,146.52 | 513,182.5               |
|                             |                         |            |                                                                                                                                           |                       |           | Page                    |

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| Bank<br>Reference<br>Number | Post Date               | Value Date | Description                                                                                                                                        | Transaction<br>Number |  | Debit    | Credit | Indicative<br>Balance |
|-----------------------------|-------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|--|----------|--------|-----------------------|
| 11302250104<br>84 37429     | <sup>6</sup> 25/02/2013 | 25/02/2013 | Auth 236526 Trace<br>9921558 VISA GB<br>BOLTON Whites<br>Card 4***1601 2013-02-<br>20 4703,47 GBP Auth<br>278223 Trace 9921559<br>VISA GB HOUNSLOW |                       |  | 7,460.74 |        | 530,329.02            |
| 11302250104<br>84 37423     | <sup>6</sup> 25/02/2013 | 25/02/2013 | British<br>Airw12528863494<br>Card 4***1601 2013-02-<br>19 500.00 CAD Auth<br>225891 Trace 9922180<br>VISA CA QUEBEC<br>British A                  |                       |  | 510.28   |        | 537,789.76            |
| 113022201040<br>84 36559    | <sup>3</sup> 22/02/2013 | 22/02/2013 | 1251803821810<br>Card 4***1601 2013-02-<br>18 1179.00 CAD Auth<br>285790 Trace 9869959<br>VISA CA QUEBEC<br>British A<br>1253204787D93             |                       |  | 1,197.74 |        | 538,30D.D4            |
| 113022201D46<br>84 36553    | 22/02/2013              | 22/02/2013 | Card 4***1601 2013-02-<br>20 20.00 GBP Auth<br>280930 Trace 9869961<br>VISA FR 0871 226 0808<br>Expedia Co Uk                                      |                       |  | 31.78    |        | 539,497.78            |
| 113022201D46<br>84 36547    | 22/02/2013              | 22/02/2013 | Card 4***1601 2013-02-<br>19 188.72 CAD Auth<br>285790 Trace 9869960<br>VISA CA MONTREAL<br>Vit Ymg/Durham Travel                                  |                       |  | 191.72   |        | 539,529.56            |
| 1 13022201046<br>84 36541   | 22/02/2013              | 22/02/2013 | Card 4***1601 2013-02-<br>20 20.00 GBP Auth<br>278208 Trace 9869958<br>VISA FR 0871 226 0808<br>Expedia Co Uk                                      |                       |  | 31.78    | :      | 539,721.28            |

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|-----------------------------|-------------------------|------------|-------------------------------------------------------------------------------------------------------------------------------|-----------------------|------|--------|---------------|-----------------------|
| Bank<br>Reference<br>Number | Post Date               | Value Date | Description                                                                                                                   | Transaction<br>Number |      | Debit  | Credit        | Indicative<br>Balance |
| 11302220104<br>84 36535     | <sup>6</sup> 22/02/2013 | 22/02/2013 | Card 4***1601 2013-02-<br>18 500.00 CAD Auth<br>285790 Trace 9869957<br>VISA CA QUEBEC<br>British A<br>1251803821784          |                       |      | 507.94 |               | 539,753.06            |
| 11302210104<br>84 39159     | <sup>6</sup> 21/02/2013 | 21/02/2013 | Card 4****1601 2013-02-<br>19 840.66 CAD Auth<br>245881 Trace 9826704<br>VISA CA WHITBY Lux<br>Limo<br>Card 4***1601 2013-02- |                       |      | 869.11 |               | 540,261.00            |
| 11302180104<br>84 40865     | <sup>5</sup> 18/02/2013 | 18/02/2013 | 14 126.39 USD Auth<br>278150 Trace 9551993<br>VISA US<br>WWW.MOO.COM Moo<br>Inc Printing                                      |                       |      | 130.30 |               | 541,130.11            |
| 113021401046<br>84 40451    | <sup>3</sup> 14/02/2013 | 14/02/2013 | Card 4***1601 2013-02-<br>12 140.57 CAD Auth<br>256241 Trace 9170133<br>VISA CA WHITBY Lux<br>Limo                            |                       |      | 145.71 |               | 541,260.41            |
| 113021401046<br>84 40445    | 14/02/2013              | 14/02/2013 | Card 4***1601 2013-02-<br>12 544.00 CAD Auth<br>257130 Trace 9170945<br>VISA CA WHITBY Lux<br>Limo                            |                       |      | 563.90 |               | 541,406.12            |
| 113021401046<br>84 40439    | 14/02/2013              | 14/02/2013 | Card 4***1601 2013-02-<br>12 111.36 CAD Auth<br>264049 Trace 9170132<br>VISA CA WHITBY Lux                                    |                       |      | 115.43 |               | 541,970.02            |
| 113021201431<br>1531415     | 12/02/2013              | 13/02/2013 | Limo<br>TRANSFER<br>COMMISSION our ref<br>FT1302110374IN03                                                                    |                       |      | 53.52  |               | 542,085.45            |
| 113021201621<br>15324       | 12/02/2013              | 13/02/2013 | INWARD<br>FT1302110374IN03 by<br>MONETIZE GROUP<br>INCOR>/RFB/MONETI                                                          |                       |      | 39     | 9,899.43      | 542,138.97            |
|                             |                         |            |                                                                                                                               |                       |      |        |               |                       |

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| R                | ank<br>eference<br>umber | Post Date               | Value Date | Description                                                                                                                                    | Transaction<br>Number | Debit         | Credit Indicative<br>Balance |
|------------------|--------------------------|-------------------------|------------|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|---------------|------------------------------|
| 11<br>84         | 13020701046<br>1 39839   | <sup>3</sup> 07/02/2013 | D7/D2/2D13 | ZE GROUP<br>INCORPORATED<br>Card 4***1601 2013-02-<br>05 829.24 USD Auth<br>215971 Trace 8743087<br>VISA US<br>WWW.MOO.COM Moo<br>Inc Printing |                       | 854.89        | 142,239.54                   |
| 1 <b>1</b><br>84 | 3020601046<br>50453      | 06/02/2013              | 06/02/2013 | Card 4***1601 2013-02-<br>04 96,90 CAD Auth<br>296214 Trace 8679767<br>VISA CA WHITBY Lux<br>Limo                                              |                       | 100.31        | 143,094.43                   |
| 11:<br>84        | 3020601046<br>50447      | 06/02/2013              | 06/02/2013 | Card 4***1601 2013-02-<br>04 147.76 CAD Auth<br>210755 Trace 8679766<br>VISA CA WHITBY Lux<br>Limo                                             |                       | 152.97        | 143,194.74                   |
| 11:<br>41:       | 3020501624<br>1721       | 05/02/2013              | 05/02/2013 | TRANSFER<br>COMMISSION out ref<br>FT13020520900ACY                                                                                             |                       | 15. <b>DD</b> | 143,347.71                   |
| 113<br>411       | 3020501624<br>1719       | 05/02/2013              | 05/02/2013 | PROCESSING FEES<br>NON SEPA ZONE our<br>ref<br>FT13020520900ACY                                                                                |                       | 16.18         | 143,362.71                   |
| 113<br>411       | 8020501624<br>1205       | 05/02/2013              | 05/02/2013 | OLTWARD<br>FT13020520900ACY to<br>MR JAIME PEREIRA<br>DE 2/4<br>RY FOR TWO<br>MONTHS, INVOICE<br>3285                                          |                       | 10,000.00     | 143,378.89                   |
| 113<br>84 4      | 020401046<br>41221       | 04/02/2013              | 04/02/2013 | Card 4***1601 2013-01-<br>31 Auth 211879 Trace<br>8432406 VISA IN<br>BANGALORE The<br>Oberoi-Bangalore F                                       |                       | 15,959.54     | 153,378.89                   |

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|-------------------------------------|-------------------------|------------|-----------------------------------------------------------------------------------------------------------------------|-----------------------|----------------|------------------------------------|------------------------------|
| Bank<br>Reterence<br>Number         | Post Date               | Value Date | Description                                                                                                           | Transaction<br>Number |                | Debit (                            | Credit Indicative<br>Balance |
| 113020401046<br>84 41215            | <sup>3</sup> 04/02/2013 | 04/02/2013 | Card 4***1601 2013-01-<br>31 1160.63 USD Auth<br>275054 Trace 8432407<br>VISA GB T5<br>HEATHROW Tiffany &<br>Co Ltd   |                       |                | 1,196.53                           | 169,338.43                   |
| 113020401046<br>84 41209            | <sup>;</sup> 04/02/2013 | 04/02/2013 | Card 4***1601 2013-01-<br>31 2039.25 GBP Auth<br>276161 Trace 8432926<br>VISA GB HOUNSLOW<br>Harrods International    |                       |                | 3,364.25                           | 170,534.96                   |
| 113020101046<br>34 41223            | 01/02/2013              | 01/02/2013 | Card 4***1601 2013-01-<br>29 8926.00 INR Auth<br>294608 Trace 8381215<br>VISA IN Gurgaon<br>Makemytrip (India) P Ltd  |                       |                | 175.43                             | 173,899.21                   |
| 13020101046<br>34 41217             | 01/02/2013              | 01/02/2013 | Card 4***1601 2013-01-<br>29 7316.00 INR Auth<br>218899 Trace 8381217<br>VISA IN BANGALORE T<br>G I Fridays           |                       |                | 143.78                             | 174,074.64                   |
| 13020101046<br>4 41211              | 01/02/2013              | 01/02/2013 | Card 4***1601 2013-01-<br>29 44846.00 INR Auth<br>293105 Trace 8381216<br>VISA IN Gurgaon<br>Makemytrip (India) P Ltd |                       |                | 881.35                             | 174,218.42                   |
| 13020101046 <sub>0</sub><br>4 41205 | )1/02/20 <sup>1</sup> 3 | 01/02/2013 | Card 4***1601 2013-01-<br>29 11209.00 INR Auth<br>294083 Trace 8381214<br>VISA IN Gurgaon<br>Makemytrip (India) P Ltd |                       |                | 220.28                             | 175,099.77                   |
| 13020101046<br>4 41199              | )1/02/2013              | 01/02/2013 | Card 4***1601 2013-01-<br>29 14658.00 INR Auth<br>295852 Trace                                                        |                       |                | 288.07                             | 175,320.05                   |

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|--------------------------------------|------------|------------------------------------------------------------------------------------------------------------------------|-----------------------|--------------------------------------|---------------------|----------|--------------------|
| ank<br>eference Post Date<br>lumber  | Value Date | Description                                                                                                            | Transaction<br>Number |                                      | Debit               |          | idicativ<br>Balanc |
|                                      |            | 8381213 VISA IN<br>Gurgaon Makemytrip<br>(India) P Ltd                                                                 |                       |                                      |                     |          |                    |
| 1301310105 31/01/2013<br>6089        | 31/01/2013 | Statement Charges                                                                                                      |                       |                                      | 5.16                | 17!      | 5,608.             |
| 13013101046 31/01/2013<br>4 39729    | 31/01/2013 | Card 4***1601 2013-01-<br>29 256196.00 INR Auth<br>278722 Trace 8315708<br>VISA IN BANGALORE<br>Karthik Business Machi |                       | 4.                                   | 985.05              | 17!      | 5,613.2            |
| 130131D1046 31/01/2013<br>4 39723    | 31/01/2013 | Card 4***1601 2013-01-<br>29 188400.00 INR Auth<br>276844 Trace 8315710<br>VISA IN BANGALORE<br>Kasturba Road Busines  |                       | 3,                                   | 665.88              | 18(      | 0,598.3            |
| 13013101045<br>31/01/2013<br>4 39717 | 31/01/2013 | Card 4***1601 2013-01-<br>29 500000,00 INR Auth<br>205943 Trace 8315709<br>VISA IN BANGALORE<br>Titan Industries Limit |                       | 9,                                   | 728. <del>9</del> 8 | 184      | 4,264.             |
| 13013001046 30/01/2013<br>4 46591    | 30/01/2013 | Card 4***1601 2013-01-<br>26 19458.00 INR Auth<br>236632 Trace 8251827<br>VISA IN Gurgaon<br>Makemytrip (India) P Lie  |                       |                                      | 376.46              | 19:      | 3,993.1            |
| 13013001046 30/01/2013<br>4 46585    | 30/01/2013 | Card 4***1601 2013-01-<br>28 128.92 CAD Auth<br>274815 Trace 8251828<br>VISA CA WHITBY Lux<br>Limo                     |                       |                                      | 132.75              | 194      | 4,369.             |
| 13013001046 30/01/2013<br>4 46579    | 30/01/2013 | Card 4***1601 2013-01-<br>25 27677.00 INR Auth<br>274740 Trace 8251826<br>VISA IN BANGALORE<br>Karthik                 |                       |                                      | 535.47              | 194      | 4,502.             |

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|-----------------------------|-------------------------|------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------|--------------|-----------------------|-------|
| sank<br>Reference<br>Number | Post Date               | Value Date | Description                                                                                                     | Transaction Debr<br>Number Debr                   | t Credit     | Indicative<br>Balance | 72,   |
|                             |                         |            | Business Machi                                                                                                  |                                                   |              |                       |       |
| 1130130D104<br>84 48573     | <sup>3</sup> 30/01/2013 | 30/01/2013 | Card 4***1601 2013-01-<br>28 1099.00 INR Auth<br>209777 Trace 8251825<br>VISA IN BANGALORE<br>Croma             | 21.26                                             |              | 195,037.87            |       |
| 11301300104<br>84 46567     | <sup>3</sup> 30/01/2013 | 30/01/2013 | Card 4***1601 2013-01-<br>28 113.92 CAD Auth<br>273849 Trace 8251824<br>VISA CA WHITBY Lox<br>Limo              | 117.30                                            |              | 195,059.13            |       |
| 113D129D162<br>50D103       | 929/01/2013             | 29/01/2013 | CHARGES OUR our ref<br>FT13012917060ACY                                                                         | 13.45                                             |              | 195,176.43            |       |
| 11301290143<br>5003437      | 29/01/2013              | 29/01/2013 | TRANSFER<br>COMMISSION our ref<br>FT13012917060ACY                                                              | 6.72                                              |              | 195,189.88            |       |
| 11301290143<br>5003435      | <sup>9</sup> 29/01/2013 | 29/01/2013 | PROCESSING FEES<br>our ref<br>FT13012917060ACY                                                                  | 16.14                                             |              | 195,196.60            |       |
| 11301290162<br>500101       | <sup>9</sup> 29/01/2013 | 29/01/2013 | OUTWARD<br>FT13012917060ACY to<br>RAJESH DIKSHIT a/c<br>MONTHS SALARY<br>PAYMENT                                | 3,700.00                                          |              | 195,212.74            |       |
| 11301290162<br>223207       | <sup>1</sup> 29/01/2013 | 29/01/2013 | "AB" COMMISSION<br>DIFFERENT CUST our<br>ref FT13012801590AAB                                                   | 6.72                                              |              | 198,912.74            |       |
| 11301290162<br>22343        | 29/01/2013              | 29/01/2013 | Transfer<br>FT13012801590AAB to<br>DREAMSCAPE<br>VENTURES a/c<br>ES RENDERED FOR<br>MARKETING AND<br>MANAGEMENT | 50,000.00                                         |              | 198,919.46            |       |

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| ank<br>eference Post Date<br>umber           | Value Date | Description                                                                                                                                  | Transaction Debit | Credit     | Indicative<br>Balance |  |
|----------------------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------|-----------------------|--|
| 13012801431<br>531767 28/01/2013             | 29/01/2013 | TRANSFER<br>COMMISSION our ref<br>FT1301250200IN03<br>INWARD                                                                                 | 53.82             |            | 248,919.46            |  |
| 13012801621 <sub>28/01/2013</sub><br>5328    | 29/01/2013 | FT1301250200IN03 by<br>MONETIZE GROUP<br>INCOR>/RFB/MONETIZ<br>E GROUP<br>INCORPORATED<br>Card 4***1601 2013-01-                             |                   | 119,900.08 | 248,973.28            |  |
| 13012801046<br>4 42484 28/01/2013            | 28/01/2013 | 24 169.94 USD Auth<br>00000 Trace 8069998<br>VISA US<br>WWW.MOO.COM Mcc<br>Inc Printing                                                      |                   | 175.20     | 129,073.20            |  |
| 13012801046 <sub>28/01/2013</sub><br>4 38127 | 28/01/2013 | Card 4***1601 2013-01-<br>24 209.69 USD Auth<br>243963 Trace 8069999<br>VISA US<br>WWW.MOO.COM Moo<br>Inc Printing<br>Card 4***1601 2013-01- | 216.18            |            | 128,898.00            |  |
| 13012501046<br>25/01/2013<br>4 38805         | 25/01/2013 | 22 67.00 USD Auth<br>215416 Trace 8012030<br>VISA GB Glasgow<br>Templatemonster.Com                                                          | 69.07             |            | 129,114.18            |  |
| 13012501046 25/01/2013<br>4 38799            | 25/01/2013 | Card 4***1601 2013-01-<br>23 91000.00 INK Auth<br>260237 Trace 8012029<br>VISA IN BANGALORE<br>Spice Retail Limited                          | 1,765.26          |            | 129,183.25            |  |
| 13012501046 <sub>25/01/2013</sub><br>4 38793 | 25/01/2013 | Card 4***16D1 2013-01-<br>22 45724.66 INR Auth<br>288284 Trace 8012028<br>VISA IN BANGALORE<br>Taj                                           | 886.99            |            | 130,948.51            |  |

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|---------------------------------|-----------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|--|-----------|-------------------------------|
| Bank<br>Reference<br>Number     | Post Date             | Value Date | Description                                                                                                                            | Transaction<br>Number                                                |  | Debit Cre | edit Indicative 72<br>Balance |
| 113012301046<br>84 46921        | 23/01/2013            | 23/01/2013 | Vivanta -Cash<br>Card 4***1601 2013-01-<br>17 4872.31 CAD Auth<br>261103 Trace 7915521<br>VISA CA QUEBEC<br>British A<br>1253203750299 |                                                                      |  | 5,107.52  | 131,835.50                    |
| 113012301046<br>84 46915        | 23/01/2013            | 23/01/2013 | Card 4***1601 2013-01-<br>21 2552, 16 CAD Auth<br>280469 Trace 7915523<br>VISA CA WHITBY Lux<br>Limo                                   |                                                                      |  | 2,675.36  | 136,943.02                    |
| 113012301046<br>34 46909        | 23/01/2013            | 23/01/2013 | Card 4***1601 2013-01-<br>17 4872.31 CAD Auth<br>261103 Trace 7915522<br>VISA CA QUEBEC<br>British A<br>1253203750300                  |                                                                      |  | 5,107.52  | 139,518.38                    |
| 13012301046.<br>14 46903        | 23/01/2013            | 23/01/2013 | Card 4***1601 2013-01-<br>17 4872.31 CAD Auth<br>261103 Trace 7915520<br>VISA CA QUEBEC<br>British A<br>1253203750301                  |                                                                      |  | 5,107.52  | 144,725.90                    |
| 13012301046,<br>4 46897         | 23/01/2013            | 23/01/2013 | Card 4***1601 2013-01-<br>17 4872.31 CAD Auth<br>261103 Trace 7915519<br>VISA CA QUEBEC<br>British A<br>1253203750302                  |                                                                      |  | 5,107.52  | 149,833.42                    |
| 13012101046<br>4 92001          | 21/01/2013            |            | Card 4***1601.2013-01-<br>18 864.00 CAD Auth<br>226372 Trace 7776536<br>VISA CA WHITBY Lux<br>Limo                                     |                                                                      |  | 911.73    | 154,940.94                    |
| 13012101046<br>4 91 <i>9</i> 95 | 21/01/2013            | 21/01/2013 | Card 4***1601 2013-01-<br>17 192.00 USD Auth<br>258717 Trace                                                                           |                                                                      |  | 197.94    | 155,852.67                    |
|                                 |                       |            |                                                                                                                                        |                                                                      |  |           |                               |

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|------------------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------------|----|
| Bank<br>Reference Post Date<br>Number          | Value Date   | Description                                                                                                                                                 | Transaction De<br>Number De | bit Credit Indicative 2            | 7  |
| 113012101046 <sub>21/01/2013</sub><br>84 91989 | 3 21/01/2013 | 7776537 VISA US<br>CARLSBAD 101domain,<br>Inc<br>Card 4**1601 2013-01-<br>18 14.63 CAD Auth<br>222388 Trace 7776535<br>VISA CA 613-4822085<br>Sibername Com | 15.                         | 13 156,050.61                      |    |
| 113012101046<br>84 91983 21/01/2013            | 21/01/2013   | Card 4 1601 2013-01-<br>18 480.00 CAD Auth<br>226405 Trace 7776534<br>VISA CA WHITBY Lux<br>Limo                                                            | 506.                        | 52 156,066.04                      |    |
| 113012101046 <sub>21/01/2013</sub><br>84 39649 | 21/01/2013   | Card 4***1601 2013-01-<br>17 917.20 USD Auth<br>259947 Trace 7723456<br>VISA US<br>WWW.MOO.COM Moo<br>Inc Printing                                          | 945.5                       | 7 156,572.56                       |    |
| 113011801046<br>84 39035                       | 18/01/2013   | Card 4***1601 2013-01-<br>16 103.04 CAD Auth<br>298366 Trace 7634002<br>VISA CA OSHAWA<br>Pelican Party Time<br>Cateri                                      | 108.5                       | 7 157,518.13                       |    |
| 113011701046 17/01/2013<br>84 41073            | 17/01/2013   | Card 4***1501 2013-01-<br>15 128.92 CAD Auth<br>241896 Trace 7589315<br>VISA CA WHITBY Lux<br>Limo                                                          | 135.3                       | 0 157,626.70                       |    |
| 113011701046<br>17/01/2013<br>84 41067         | 17/01/2013   | Card 4***1601 2013-01-<br>15 1313.08 CAD Auth<br>236549 Trace 7589314<br>VISA CA OSHAWA<br>Pelican Party Time<br>Cateri                                     | 1,378.1                     | 5 157,762.00                       |    |
| 113011601046 16/01/2013<br>84 45051            | 16/01/2013   | Card 4***1601 2013-01-<br>14 158.00 CAD                                                                                                                     | 166.92                      | 2 159,140.16                       |    |

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|----------------------------------------|-------------------------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------------------------------------------------|----------|-------------------------|----------|--|
| Bank<br>Reference P<br>Number          | ost Date                | Value Date | Description                                                                                                                                                  | Transaction<br>Number |                                                                   | Debit    | Credit Indicat<br>Balar |          |  |
| 113011601046 <sub>11</sub><br>84 45045 | 6/01/2013               | 16/01/2013 | Auth 284735 Trace<br>7226927 VISA CA<br>WHITBY Lux Limo<br>Card 4**1601 2013-01-<br>14 101.00 CAD Auth<br>283973 Trace 7226929<br>VISA CA WHITBY Lux<br>Limo |                       |                                                                   | 106.7D   | -<br>159,307.           | 728<br>∞ |  |
| 113011601048 <sub>16</sub><br>84 45039 | 5/01/2013               | 16/01/2013 | Card 4***1601 2013-01-<br>14 128.92 CAD Auth<br>284296 Trace 7226930<br>VISA CA WHITBY Lux<br>Limo                                                           |                       |                                                                   | 136.21   | 159,413.                | 78       |  |
| 113011601046 16<br>84 45033            | 6/01/2013               | 16/01/2013 | Card 4***1601 2013-01-<br>14 157.07 CAD Auth<br>284010 Trace 7226931<br>VISA CA WHITBY Lux<br>Limo                                                           |                       |                                                                   | 165.84   | 159,549.8               | 99       |  |
| 113011601046 16<br>84 45027            | /01/2013                | 16/01/2013 | Card 4***1601 2013-01-<br>14 128.92 CAD Auth<br>284310 Trace 7226932<br>VISA CA WHITBY Lux<br>Limo                                                           |                       |                                                                   | 136.21   | 159,715.5               | 3        |  |
| 113011601046<br>84 45021               | /01/2013                |            | Card 4***1601 2013-01-<br>14 128.92 CAD Auth<br>284250 Trace 7226928<br>VISA CA WHITBY Lux<br>Limo                                                           |                       |                                                                   | 136.21   | 159,852.1               | 4        |  |
| 113011601046<br>84 45015               | /01/2013                | 16/01/2013 | Card 4***1601 2013-01-<br>14 101.00 CAD Auth<br>283957 Trace 7226926<br>VISA CA WHITBY Lux<br>Limo                                                           |                       |                                                                   | 108.70   | 159,988.3               | 5        |  |
| 1130114D1046<br>84 88817               | 01/2013                 | 14/01/2013 | Card 4***1601 2013-01-<br>11 3839.24 CAD Auth<br>226133 Trace 7008710<br>VISA CA OSHAWA<br>Staples Store 203                                                 |                       |                                                                   | 4,057.86 | 160,095.0               | 5        |  |

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| 13uonom n                           | 5001 y.1400 | .0         |                                                                                                                        | mips.//ie//de.outhor/jp/us.com/netener/ | 1 misuoriom 11 | 3101 3.14003 .1          |
|-------------------------------------|-------------|------------|------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|----------------|--------------------------|
| Bank<br>Reference<br>Number         | Post Date   | Value Date | Description                                                                                                            | Transaction Deb.<br>Number Deb.         | it Credil      | Indicative<br>Balance729 |
| 11301100162<br>234115               |             |            | CHARGES OUR our ref<br>FT1301022069OACY                                                                                | 78.0                                    | 5              | 164,152.91               |
| 11301100162<br>2341039              | 10/01/2013  | 10/01/2013 | TRANSFER<br>COMMISSION our ref<br>FT13010220690ACY                                                                     | 520.32                                  | <u>!</u>       | 164,230.96               |
| 11301100162 <sup>.</sup><br>2341037 | 10/01/2013  | 10/01/2013 | PROCESSING FEES<br>our ref<br>FT13010220690ACY<br>OUTWARD                                                              | 15.61                                   |                | 164,751.28               |
| 113011001621<br>234113              | 10/01/2013  | 10/01/2013 | TT3010220690ACY to<br>TECHNOCASH<br>LIMITED a/c<br>231546-USERNAME:<br>BANNERSBROKER<br>BSB NUMBER: 034-               | 400,000.00                              | 1              | 164,766.89               |
| 113011001624<br>411265              | 10/01/2013  | 10/01/2013 | CHARGES OUR our ref<br>FT1301022206OACY                                                                                | 45.75                                   |                | 564,766.89               |
| 113011001624<br>4111031             | 10/01/2013  | 10/01/2013 | TRANSFER<br>COMMISSION our ref<br>FT13010222060ACY                                                                     | 37.50                                   | :              | 564,812.64               |
| 113011001624<br>4111029             | 10/01/2013  | 10/01/2013 | PROCESSING FEES<br>our ref<br>FT13010222060ACY                                                                         | 15.68                                   | I              | 564,850.14               |
| 113011001624<br>411263              | 10/01/2013  | 10/01/2013 | OUTWARD<br>FT13010222060ACY to<br>STACY MYRIAM<br>LOUISE a/c<br>STACY PAY FOR<br>THREE MONTHS                          | 25,000.00                               | 1              | 564,865.82               |
| 113010801046<br>34 34919            | 08/01/2013  | 08/01/2013 | Card 4***1601 2013-01-<br>04 903.19 USD Auth<br>284606 Trace 6759709<br>VISA BS NASSAU<br>Atlantis Royal Towers<br>Fro | 931.12                                  | Ę              | 589,865.82               |
| 13010801046<br>14 34913             | 8/01/2013   | 08/01/2013 | Card 4***1601 2013-01-<br>04 4057.34 USD Auth<br>284602 Trace                                                          | 4,182.82                                | 5              | 590,796.94               |
|                                     |             |            |                                                                                                                        |                                         |                |                          |

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| Bank<br>Reterence Post Da<br>Number          | ate Value Date |                                                                                                                                                                                          | Transaction<br>Number | Det      | it Credit | Indicative<br>Balance |
| 113010701046<br>84 46673                     | 013 07/01/2013 | 6759708 VISA BS<br>NASSAU Atlantis Royal<br>Towers Fro<br>Card 4***1601 2013-01-<br>01 95.50 USD Auth<br>244750 Trace 6555589<br>VISA BS NASSAU<br>Senor Frogs<br>Card 4***1601 2013-01- |                       | 98.4     | 5         | 73(<br>594,979.76     |
| 113010701046<br>84 46667                     | 013 07/01/2013 | 01 249.00 USD Auth<br>234308 Trace 6555588<br>VISA BS NASSAU<br>Atlantis Kodak Photo                                                                                                     |                       | 256.70   | )         | 595,078.21            |
| 113010701046<br>84 46661                     | 13 07/01/2013  | Shop<br>Card 4***1601 2013-01-<br>01 12400.00 USD Auth<br>244510 Trace 655587<br>VISA BS PARADISE<br>ISLA John Bull                                                                      |                       | 12,783.5 |           | 595,334.91            |
| 113010701046 <sub>07/01/20</sub><br>84 95085 | 13 07/01/2018  | Card 4***1601 2013-01-<br>02 213.99 CAD Auth<br>286773 Trace 6668127<br>VISA CA<br>CONTINENTAL United<br>Air 016320321                                                                   |                       | 225.20   |           | 608,118.42            |
| 113010701046<br>07/01/201<br>94 95079        | 13 07/01/2013  | Card 4***1601 2013-01-<br>02 213.99 CAD Auth<br>286773 Trace 6668126<br>VISA CA<br>CONTINENTAL United<br>Air 016320321                                                                   |                       | 225.20   |           | 608,343.62            |
| 13010701046<br>07/01/201<br>94 47144         | 13 07/01/2013  | Card 4***1601 2013-01-<br>03 15.76 CAD Auth<br>00000 Trace 6612433<br>VISA CA 800-367-3476<br>Expedia travel                                                                             |                       |          | 16.43     | 608,568.B2            |

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| Bank<br>Reference<br>Number | Post Date                | Value Date | Description                                                                                                          | Transaction Debit Cr<br>Number                    | edit Indicative<br>Balance 7 |
| 11301070104<br>84 43493     | <sup>46</sup> 07/01/2013 | 07/01/2013 | Card 4***1601 2013-01-<br>03 1652.97 CAD Auth<br>286770 Trace 6612434<br>VISA CA 800-367-3476<br>Expedia travel      | 1,733.45                                          | 608,552.39                   |
| 11301040143<br>748541       | <sup>31</sup> 04/01/2013 | 07/01/2013 | TRANSFER<br>COMMISSION our ref<br>FT13010301901N03<br>INWARD                                                         | 52,98                                             | 610,285.84                   |
| 11301040162<br>7488         | <sup>11</sup> 04/01/2013 | 07/01/2013 | FT1301030190IN03 by<br>MONETIZE GROUP<br>INCOR>/RFB/MONETIZ<br>E GROUP<br>INCORPORATED                               | 149,900                                           | .61 610,338.82               |
| 11301030104<br>84 67815     | <sup>6</sup> 03/01/2013  | 03/01/2013 | Card 4***1601 2012-12-<br>30 2395.00 BSD Auth<br>235289 Trace 6485617<br>VISA BS BHS Gianni<br>Versace               | 2,500.57                                          | 460,438.21                   |
| 11301030104<br>84 67809     | <sup>6</sup> D3/D1/2013  | D3/01/2013 | Card 4***1601 2013-01-<br>01 1130.00 USD Auth<br>211902 Trace 6485616<br>VISA US 212-988-8888<br>Treasures Internati | 1,164.95                                          | 462,938.78                   |
| 11301030162<br>41111        | 403/01/2013              | 03/01/2013 | CHARGES OUR our ref<br>FT13010220830ACY                                                                              | 13.14                                             | 464,103.73                   |
| 113010301624<br>41169       | 403/01/2013              | 03/01/2013 | TRANSFER<br>COMMISSION our ref<br>FT13010220830ACY                                                                   | 6.57                                              | 464,116.87                   |
| 113010301624<br>41167       | 03/01/2013               | 03/01/2013 | PROCESSING FEES<br>our ref<br>FT1301022083OACY                                                                       | 15.77                                             | 464,123.44                   |
| 113010301624<br>4119        | 03/01/2013               |            | OUTWARD<br>FT1301022083OACY to<br>KAFRI LEIBOVICH LAW<br>a/c<br>IL7401306200000111                                   | 3,500.00                                          | 464,139.21                   |

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|                                      | <sup>6</sup> 31/12/2012                                                                                                                                                                                       | 31/12/2012                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Card 4***1601 2012-12-<br>28 18000.00 USD Auth<br>248779 Trace 6328312<br>VISA US 516-4325900<br>Air Charter Service                                                  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| 11212310143<br>6001537               | 931/12/2012                                                                                                                                                                                                   | 02/01/2013                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | TRANSFER<br>COMMISSION our ref<br>FT1212310173IN03                                                                                                                    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| 112123101626<br>6008                 | 31/12/2012                                                                                                                                                                                                    | 02/01/2013                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | FT1212310173IN03 by<br>CEO - CONSULTORIA                                                                                                                              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| 112123101046<br>84 96881             | 31/12/2012                                                                                                                                                                                                    | 31/12/2012                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                       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| 112123101046<br>84 <del>96</del> 875 | 31/12/2012                                                                                                                                                                                                    | 31/12/2012                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Card 4***1601 2012-12-<br>28 7500.00 CAD Auth<br>213600 Trace 6263448<br>VISA CA 905-4330011<br>Www Adventistgiving                                                   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| 1121231D1D46<br>84 45299             | 31/12/2012                                                                                                                                                                                                    | 31/12/2012                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Card 4***1601 2012-12-<br>26 1234.00 USD Auth<br>280802 Trace 6210947<br>VISA US 800-285-2684<br>Paradise Island Vac                                                  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| 112122701621<br>234399               | 27/12/2012                                                                                                                                                                                                    | 27/12/2012                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | "AB" COMMISSION<br>DIFFERENT CUST our<br>ref FT12122709390AAB                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                      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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                      | Bank<br>Reference<br>Number<br>11212310105<br>59553<br>11212310104<br>84 41123<br>112123101436<br>6001537<br>112123101046<br>84 96881<br>112123101046<br>84 96875<br>112123101046<br>84 45299<br>112122701621 | Bank<br>Reference<br>Number         Post Date           11212310105<br>59553         31/12/2012           112123101046<br>84 41123         31/12/2012           112123101046<br>8001537         31/12/2012           112123101629<br>6008         31/12/2012           112123101046<br>84 96881         31/12/2012           112123101046<br>84 96881         31/12/2012           112123101046<br>31/12/2012         31/12/2012           112123101046<br>31/12/2012         31/12/2012           112123101046<br>84 45299         31/12/2012           112122701621<br>32/4 200012         31/12/2012 | Reference<br>Number         Post Date         Value Date           11212310105         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         02/01/2013           112123101046         31/12/2012         02/01/2013           112123101046         31/12/2012         02/01/2013           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012           112123101046         31/12/2012         31/12/2012 | Bank<br>Reference<br>Number         Post Date         Value Date         Description           11212310105<br>59553         31/12/2012         31/12/2012         42371>STELLAR<br>POINT ISRAEL LTD           11212310105<br>59553         31/12/2012         31/12/2012         Statement Charges           112123101046<br>6001537         31/12/2012         31/12/2012         Statement Charges           112123101046<br>6001537         31/12/2012         31/12/2012         VISA US 516-4325900<br>Air Charter Service           112123101629<br>6008         31/12/2012         02/01/2013         TRANSFER<br>COMMISSION our ref<br>FT1212310173IN03<br>INWARD           112123101046<br>6008         31/12/2012         02/01/2013         Transfer<br>CCONSULTORIA<br>DE<br>Card 4***1601 2012-12-<br>25 6724.38 CAD Auth<br>DE<br>Card 4***1601 2012-12-<br>25 6724.38 CAD Auth<br>21500 Trace 6263448           112123101046<br>84 96881         31/12/2012         31/12/2012         31/12/2012           112123101046<br>31/12/2012         31/12/2012         31/12/2012         Card 4***1601 2012-12-<br>28 7500.0D CAD Auth<br>213600 Trace 626348           112123101046<br>31/12/2012         31/12/2012         31/12/2012         Card 4***1601 2012-12-<br>26 1234.00 USD Auth<br>280802 Trace 6210947           112122701821 27/1521         31/12/2012         31/12/2012         YISA US 800-285-2874<br>YISA US 800-285-2874<br>YISA US 800-285-2874<br>YISA US 800-285-2874 | Bank<br>Reference<br>Number         Post Date         Value Date         Description         Transaction<br>Number           11212310105<br>59553         31/12/2012         31/12/2012         Statement Charges           112123101046<br>59553         31/12/2012         31/12/2012         Statement Charges           112123101046<br>5901537         31/12/2012         02/01/2013         TRANSFER<br>COMMISSION our ref<br>FT1212310173IN03 by<br>CEO - CONSULTORIA •<br>DE<br>Card 4***1601 2012-12-<br>20 Card 4***1601 2012-12-<br>20 Card 4***1601 2012-12-<br>22 F7500.DD CAD Auth<br>Furniture Gallerles           112123101046<br>51/12/2012         31/12/2012         31/12/2012         21/12/2012           112123101046<br>54 96881         31/12/2012         31/12/2012         27/191 Trace 6263449<br>VISA CA OSHAWA<br>Furniture Gallerles           112123101046<br>54 96875         31/12/2012         31/12/2012         21/2012         21/2012<br>21/2010         Card 4***1601 2012-12-<br>28 7500.DD CAD Auth<br>FURITURE Gallerles           112123101046<br>54 9689         31/12/2012         31/12/2012         21/2012         Card 4***1601 2012-12-<br>28 7500.DD CAD Auth<br>FURENCUS Courte Card 4***1601 2012-12-<br>26 1234.00 USD A | Bank<br>Reference<br>Number         Post Date         Value Date         Description         Transaction<br>Number           11212310105<br>59553         31/12/2012         31/12/2012         Statement Charges           2371*STELLAR<br>POINT ISRAEL LTD         24371*STELLAR<br>POINT ISRAEL LTD         112123101046<br>31/12/2012         31/12/2012           112123101046<br>501537         31/12/2012         31/12/2012         Statement Charges         Card 4***1601 2012-12-<br>28 1500.00 USD Auth<br>248779 Trace 5328312           112123101046<br>5001537         31/12/2012         02/01/2013         TRANSFER<br>COMMISSION our ref<br>FT12123101731N03 by<br>CEO - CONSULTORIA         DE<br>Card 4***1601 2012-12-<br>26 5724.38 CAD Auth<br>272191 Trace 5283449           112123101046<br>31/12/2012         31/12/2012         31/12/2012         31/12/2012           112123101046<br>31/12/2012         31/12/2012         31/12/2012           112123101046<br>31/12/2012         31/12/2012         31/12/2012           112123101046<br>31/12/2012         31/12/2012         Card 4***1601 2012-12-<br>28 7500.00 CAD Auth<br>273800 Trace 5283448           112123101046<br>34 99875         31/12/2012         31/12/2012         Card 4***1601 2012-12-<br>28 7300.00 CAD Auth<br>273800 Trace 5283448           112123101046<br>34 45299         31/12/2012         31/12/2012         21/12/2012           112122701621         31/12/2012         31/12/2012         Card 4***1601 2012-12-<br>28 7800.00 CAD Aut | Bank<br>Reference<br>Number         Post Date         Value Date         Description         Transaction<br>Number         Debit           11212310105<br>\$9553         31/12/2012         31/12/2012         Statement Charges         3.30           112123101046<br>\$41123         31/12/2012         31/12/2012         31/12/2012         Statement Charges         3.30           112123101046<br>\$41123         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         18,556.70           112123101046<br>\$31/12/2012         02/01/2013         TRANSFER<br>COMMISSION our ref<br>F02/31/12/2012         Transolution by<br>CEO - CONSULTORIA +<br>DE<br>Card 4***1601 2012-12-<br>227/19 Trace 523449         13.18           112123101046<br>\$31/12/2012         31/12/2012         31/12/2012         31/12/2012         7.047.23           112123101046<br>\$31/12/2012         31/12/2012         31/12/2012         Card 4***1601 2012-12-<br>227/19 Trace 523449         7.047.23           112123101046<br>\$31/12/2012         31/12/2012         Stot Adventistigning         7.047.23           112123101046<br>\$31/12/2012         31/12/2012         Card 4***1601 2012-12-<br>22800 Trace 523448         7.860.10           112123101046<br>\$31/12/2012         31/12/2012         Stot Adventistigning         7.860.10           112123101046<br>\$31/12/2012         31/12/2012         Stot Adventi | Bank<br>Reference<br>Number         Post Date         Value Date         Description         Transaction<br>Number         Debit         Credit           11212310106<br>39653         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         31/12/2012         TRANSFER<br>FT:21/23101303 by<br>G008         13.18         13.18         13.18           112/123101458         31/12/2012         02/01/2013         TRANSFER<br>FC:0 CONSULTORIA 4         \$9.980.00         \$9.980.00           112/123101458         31/12/2012         02/01/2013         TRANSFER<br>FC:0 CONSULTORIA 4         \$9.980.00         \$9.980.00           112/123101465         31/12/2012         31/12/2012         31/12/2012         \$9.980.00         \$9.980.00           112/123101046         31/12/2012         31/12/2012         31/12/2012         31/12/2012         \$9.980.00         \$9.980.00           112/123101046         31/12/2012         31/12/2012         31/12/2012         < | Bank<br>Reference<br>Reference<br>Sepsition         Value Date         Description         Transaction<br>Number         Debit         Orent         Orent         Indicative<br>Bancs           11212310106<br>58953         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012         31/122012 |

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|------------------------------------------|--------------------------|--------------------------------------------------------------------------|-----------------------|---------------------------------------------------------------------|----------------------------------|--|--|--|
| Bank<br>Reference Post<br>Number         | Date Value               | Date Description                                                         | Transaction<br>Number | Debit                                                               | Credit Indicative<br>Balance 733 |  |  |  |
| 112122701621<br>23413                    | /2012 27/12              | VENTURES 2/C                                                             |                       | 50,000.00                                                           | 492,408.49                       |  |  |  |
| 112122701621<br>425265                   | /2012 27/12              | FT12122707020ACY                                                         |                       | 15.00                                                               | 542,408.49                       |  |  |  |
| 112122701621<br>27/12<br>425263          | /2012 27/12              | FT12122707020ACY                                                         |                       | 15.87                                                               | 542,423 <i>A</i> 9               |  |  |  |
| 112122701621<br>42555                    | /2012 27/12/             | OUTWARD<br>FT12122707020ACY to<br>2012 STELLAR POINT INC<br>a/c<br>E 342 |                       | 10,000.00                                                           | 542,439.36                       |  |  |  |
| 112122701621 27/12<br>22357              |                          | 2012 CHARGES OUR our ref<br>FT12122703340ACY                             |                       | 46.30                                                               | 552,439.36                       |  |  |  |
| 112122701621<br>223185                   | 2012 27/12/              | FT12122703340ACY                                                         |                       | 50.52                                                               | 552,485.66                       |  |  |  |
| 112122701621 <sub>27/12/</sub><br>223183 | 2012 27/12/              | PROCESSING FEES<br>2012 our ref<br>FT12122703340ACY<br>OUTWARD           |                       | 15.87                                                               | 552,536.18                       |  |  |  |
| 112122701621 27/12/<br>22355             | 2012 27/12/7             | FT12122703340ACY to<br>JIM COLEMAN<br>AUTOMOTI a/c<br>1000031605909>TRAN |                       | 33,677.00                                                           | 552,552.05                       |  |  |  |
| 112122701431<br>7993329                  | 2012 28/12/2             | D12 TRANSFER<br>COMMISSION our ref                                       |                       | 52.91                                                               | 586,228.05                       |  |  |  |
|                                          |                          |                                                                          |                       |                                                                     |                                  |  |  |  |

| isactionic instant.                       | ,      | -          |                                                                                                                                                                       | http://ite//doi/doi/doi/doi/doi/doi/doi/doi/doi/do | allow ciointi | 13tor y.14003 . 1        |
|-------------------------------------------|--------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|---------------|--------------------------|
| Bank<br>Reference Post<br>Number          | t Date | Value Date | Description                                                                                                                                                           | Transaction Debit<br>Number                        | Credit        | Indicative<br>Balance734 |
| 112122701621<br>79930                     |        | 28/12/2012 | FT1212240257IN03<br>INWARD<br>FT1212240257IN03 by<br>MONETIZE GROUP<br>INCOR?/RFB/MONETIZ<br>E GROUP<br>INCORPORATED<br>Card 4***1601 2012-12-<br>13 1057.62 CAD Auth |                                                    | 424,901.01    | 586,281.96               |
| 112121701046<br>84 40893                  | 2/2012 | 17/12/2012 | 210008 Trace 5412547<br>VISA CA OSHAWA<br>Churchill Oshawa Ltd                                                                                                        | 1,118.45                                           |               | 161,380.95               |
| 112121301046 <sub>13/12</sub><br>84 42615 | 2/2012 | 13/12/2012 | Card 4***1601 2012-12-<br>11 19000.00 CAD Auth<br>277383 Trace 5016816<br>VISA CA OSHAWA<br>Oshawa Jewellery<br>Exchange                                              | 20.073.39                                          |               | 162,499.40               |
| 112120701046<br>84 43961                  | /2012  | 07/12/2012 | Card 4***1601 2012-12-<br>D5 519.42 CAD Auth<br>234204 Trace 4608558<br>VISA CA OSHAWA<br>Durham Region Media<br>Group                                                | 542.67                                             |               | 182,572.79               |
| 112120701431<br>7991205                   | /2012  |            | TRANSFER<br>COMMISSION our ref<br>FT1212060254IND3<br>INWARD                                                                                                          | 52.35                                              |               | 183,115.46               |
| 112120701621 07/12<br>78946               | /2012  | 10/12/2012 | FT1212060254IN03 by<br>MONETIZE GROUP<br>INCOR>/RFB/MONETIZ<br>E GROUP<br>INCORPORATED.                                                                               |                                                    | 149,901.94    | 183,167.81               |
| 12120601046<br>06/12/<br>04 45541         | 2012   | 06/12/2012 | Card 4***1601 2012-12-<br>03 19499.00 USD Auth<br>232665 Trace 4558135<br>VISA US                                                                                     | 20,102.05                                          |               | 33,265.87                |

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| Bank<br>Reference<br>Number | Post Date               | Value Date | Description                                                                                                                                               | Transaction<br>Number | Debit     | Credit   | Indicative<br>Balance |     |
|-----------------------------|-------------------------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------|----------|-----------------------|-----|
| 112120401040<br>84 41898    | <sup>3</sup> 04/12/2012 | 04/12/2012 | 516-4325900 Air<br>Charter Service<br>Card 4***1601 2012-11-<br>30 7016.05 CAD Auth<br>00000 Trace 4416354<br>VISA CA WINNIPEG Air<br>Canada 014252682694 |                       |           | 7,325.29 | -<br>53,367.93        | 73! |
| 112120401046<br>84 38511    | 04/12/2012              | 04/12/2012 | Card 4***1601 2012-12-<br>01 19971.37 USD Auth<br>267836 Trace 4418353<br>VISA IE DUNDRUM<br>Weir & Son Dundrum<br>Ltd                                    |                       | 20,589.04 |          | 46,042.64             |     |
| 11211300105<br>92007        | 30/11/2012              | 30/11/2012 | Statement Charges                                                                                                                                         |                       | 3.25      |          | 66,631.68             |     |
| 112112901046<br>84 39289    | 29/11/2012              | 29/11/2012 | Card 4***1601 2012-11-<br>27 18.00 CAD Auth<br>201897 Trace 4131949<br>VISA CA TORONTO<br>Impark00090433a                                                 |                       | 18.BO     |          | 66,634.93             |     |
| 112112201046<br>84 42447    | 22/11/2012              | 22/11/2012 | Card 4***1601 2012-11-<br>19 18630.00 USD Auth<br>201911 Trace 3610189<br>VISA US 516-4325900<br>Air Charter Service                                      |                       | 19,206.19 |          | 66,653.73             |     |
| 112111901046<br>84 43645    | <u>19/11/2012</u>       | 19/11/2012 | Card 4***1601 2012-11-<br>16 18630.00 USD Auth<br>249987 Trace 3645757<br>VISA US 516-4325900<br>Air Charter Service                                      |                       | 19,206.19 |          | 85,859.92             |     |
| 112111901624<br>411353      | 19/11/2012              | 10/11/2012 | "AB" COMMISSION<br>SAME CUSTOMER our<br>ref FT12111910740AAB                                                                                              |                       | 2.17      |          | 105,066.11            |     |

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| Bank<br>Reference<br>Number | Post Date  | Value Date |                                                                                                                        | Transaction<br>Number | Debit     | Credit Indicative<br>Balance |
|-----------------------------|------------|------------|------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------|------------------------------|
| 112111901624<br>411139      | 19/11/2012 | 19/11/2012 | Transfer<br>FT12111910740AAB to<br>BANNERSBROKER<br>LIMITE a/c<br>OF EXCESS                                            |                       | 100.00    | 736                          |
| 112111501046<br>84 41761    | 15/11/2012 | 15/11/2012 | Card 4***1601 2012-11-<br>13 1994.45 CAD Auth<br>282098 Trace 3139674<br>VISA CA 905-4347773<br>Sign A Rama            |                       | 2,075.12  | 105,168.28                   |
| 112111401046<br>84 45681    | 14/11/2012 | 14/11/2012 | Card 4***1601 2012-11-<br>09 15066.94 USD Auth<br>277795 Trace 3081999<br>VISA US 800-285-2684<br>Paradise Island Vac  |                       | 15,532.93 | 107,243.40                   |
| 112110901046<br>84 43761    | 09/11/2012 | 09/11/2012 | Card 4***1601 2012-11-<br>07 552,57 CAD Auth<br>255678 Trace 2759413<br>VISA CA OSHAWA<br>Durham Region Media<br>Group |                       | 577.63    | 122,776.33                   |
| 11210310105<br>97119        | 31/10/2012 | 31/10/2012 | Statement Charges                                                                                                      |                       | 3.25      | 123,353.96                   |
| 112102401046<br>84 44721    | 24/10/2012 | 24/10/2012 | Card 4***1601 2012-10-<br>18 250.00 CAD Auth<br>278831 Trace 1915353<br>VISA CA WILLOWDALE<br>Lufthansa 2202526826     |                       | 262.04    | 123,357.21                   |
| 112102201046<br>84 38519    | 2/10/2012  | 22/10/2012 | Card 4***1601 2012-10-<br>18 1579,53 CAD Auth<br>278356 Trace 1843599<br>VISA CA WINNIPEG Air<br>Canada 014252682698   |                       | 1,668.12  | 123,619.25                   |

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| Bank<br>Reference<br>Number | Post Date               | Value Date | Description                                                                                                          | Transaction<br>Number |                         | D                | ebit Cro  | dit Indicative<br>Balance |     |
| 11210220104<br>84 38513     | <sup>6</sup> 22/10/2012 | 22/10/2012 | Card 4***1601 2012-10-<br>20 39.55 CAD Auth<br>200611 Trace 1843600<br>VISA CA 888-955-5455<br>Uniworld Travel       |                       |                         | 41               | .76       | 125,287.37                | 73  |
| 11210220104<br>84 38507     | <sup>6</sup> 22/10/2012 | 22/10/2012 | Card 4***1601 2012-10-<br>20 B4.75 CAD Auth<br>200507 Trace 1843602<br>VISA CA 888-955-5455<br>Uniworld Trave!       |                       |                         | 89.              | 50        | 125,329.13                |     |
| 112102201046<br>84 38501    | <sup>3</sup> 22/10/2012 | 22/10/2012 | Card 4***1601 2012-10-<br>18 684.23 CAD Auth<br>293111 Trace 1843601<br>VISA CA WINNIPEG Air<br>Canada 014252723725  |                       |                         | 722.             | 60        | 125,418.63                |     |
| 112102201046<br>84 38495    | 22/10/2012              | 22/10/2012 | Card 4***1601 2012-10-<br>20 39.55 CAD Auth<br>200614 Trace 1843603<br>VISA CA 888-955-5455<br>Uniworld Travel       |                       |                         | 41.              | 76        | 126,141.23                |     |
| 12102201046<br>34 38677     | 22/10/2012              | 22/10/2012 | Card 4***1601 2012-10-<br>18 84.75 CAD Auth<br>296764 Trace 1740319<br>VISA CA 888-955-5455<br>Uniworld Travel       |                       |                         | 89.7             | 12        | 126,182.89                |     |
| 12102201046<br>4 38671      | 22/10/2012              | 22/10/2012 | Card 4***1601 2012-10-<br>16 7366.05 CAD Auth<br>289389 Trace 1740321<br>VISA CA WINNIPEG Air<br>Canada 014252682694 |                       |                         | 7,788.0          | 12        | 126,272.71                |     |
| 12102201046<br>4 38665      | 22/10/2012              | 22/10/2012 | Card 4***16D1 2012-10-<br>18 39.55 CAD Auth<br>296766 Trace                                                          |                       |                         | 41.8             | 7         | 134,070.73                |     |
|                             |                         |            |                                                                                                                      |                       |                         |                  |           |                           |     |

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| Bink<br>Number         Post Date         Value Date         Description         Transaction<br>Number         Debit         Credit         Indicator<br>Bising<br>Participation           12102201046         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012         22102012                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | TailsactionFristory.taces |                              |            | https://newdb.bankorcyprus.com/nettener/fransaction#istory.faces/f.                                                        |  |  |          |            |            |     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------|--|--|----------|------------|------------|-----|
| 112102201046         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10/2012         22/10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Referen                   |                              | Value Date | Description                                                                                                                |  |  | Debit    | Credit     |            |     |
| 112102201046       22/10/2012       22/10/2012       10 107.74 CAD Audit       20042 Trace 1740318         20042 Trace 1740318       20042 Trace 1740318       134.154.47         20042 Trace 1740317       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       22/10/2012       21/10/2012       TRANSFER Common Comm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 112102<br>84 3865         | 201046<br>22/10/2012         | 22/10/2012 | 955-5455 Uniworld<br>Travel<br>Card 4***1601 2012-10-<br>18 39.55 CAD Auth<br>296765 Trace 1740320<br>VISA CA 888-955-5455 |  |  | 41.87    |            | 134,112.60 | / ) |
| 112102201046       22/10/2012       22/10/2012       16 435.84 CAD Auth<br>290682 Trace 1740317         84 38647       22/10/2012       22/10/2012       135,295.51         112100901431       09/10/2012       03/10/2012       TRANSFER<br>COMMISSION FC our<br>ref F1209284495iN03 by<br>MiCHAEL<br>F1209284495iN03 by<br>MiCHAEL<br>HERLIHY MICHAEL<br>HERLIHY IRELAND       51.93       135,756.91         11209280105<br>96399       28/09/2012       30/09/2012       Statement Charges       3.28       5,808.84         11209280105<br>96399       28/09/2012       31/08/2012       Statement Charges       3.14       5,812.12         112082701046<br>28701046       27/08/2012       27/08/2012       Statement Charges       3.14       5,815.26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 112102<br>84 3865         | 201046<br>22/10/2012<br>;3   | 22/10/2012 | 16 1077.84 CAD Auth<br>290432 Trace 1740318<br>VISA CA WINNIPEG Air                                                        |  |  | 1,141.04 |            | 134,154.47 |     |
| 112100901431<br>7992193       09/10/2012       03/10/2012       COMMISSION FC our<br>ref FT12092844951N03       51.93       135,756.91         112100901621<br>79918       09/10/2012       03/10/2012       03/10/2012       NWARD<br>FT12092844951N03 by<br>MICHAEL<br>HERLIHY INCHAEL<br>HERLIHY INCHA | 1121022<br>84 3864        | 201046<br>22/10/2012<br>7    | 22/10/2012 | 15 435.84 CAD Auth<br>290682 Trace 1740317<br>VISA CA WINNIPEG Air                                                         |  |  | 461.40   |            | 135,295.51 |     |
| 112100901621<br>79918       09/10/2012       03/10/2012       03/10/2012       130,000.00       135,808,84         11209280105<br>96399       28/09/2012       30/09/2012       Statement Charges       3.28       5,808,84         112082701045<br>2287       31/08/2012       31/08/2012       Statement Charges       3.14       5,812.12         112082701046<br>2287       31/08/2012       Statement Charges       3.14       5,812.12         112082701046<br>84 82941       27/08/2012       27/08/2012       Statement Charges       2,126.72       5,815.26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 1121009<br>7992193        | 01431<br>09/10/2012          | 03/10/2012 | COMMISSION FC our                                                                                                          |  |  | 51.93    |            | 135,756.91 |     |
| 96399         26/09/2012         3/09/2012         Statement Charges         3/28         5,808.84           1120831D105         31/08/2012         31/08/2012         Statement Charges         3.14         5,812.12           2287         31/08/2012         Statement Charges         3.14         5,812.12           112082701046         27/08/2012         27/08/2012         27/08/2012         21/08/2012         21/08/2012           84 82941         27/08/2012         27/08/2012         27/08/2012         27/08/2012         2,126.72         5,815.26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 1121009<br>79918          | <sup>101621</sup> 09/10/2012 | 03/10/2012 | FT1209284495IN03 by<br>MICHAEL<br>HERLIHY>MICHAEL                                                                          |  |  |          | 130,000.00 | 135,808.84 |     |
| 11208310105<br>2287       31/08/2012       31/08/2012       Statement Charges       3.14       5,812.12         2287       Card 4***1601 2012-08-<br>23 2028.08 CAD Auth       23 2028.08 CAD Auth       23 2028.08 CAD Auth         112082701046<br>84 82941       27/08/2012       27/08/2012       27/08/2012       27/08/2012       5,815.26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                           | 0105 28/09/2012              | 30/09/2012 |                                                                                                                            |  |  | 3.28     |            | 5,808.84   |     |
| Card 4***1601 2012-08-<br>23 2028.08 CAD Auth           1120827D1046<br>27/08/2012         27/08/2012         216926 Trace 7146767         2,126.72         5,815.26           84 82941         VISA CA TORONTO Lot         VISA CA TORONTO Lot         5,815.26                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 1120831                   | D105 31/08/2012              | 31/08/2012 | Statement Charges                                                                                                          |  |  | 3.14     |            | 5,812.12   |     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1120827                   | 01046 <sub>27/08/2012</sub>  | 27/08/2012 | 23 2028 08 CAD Auth<br>216926 Trace 7146767<br>VISA CA TORONTO Lot                                                         |  |  | 2,126.72 |            | 5,815.26   |     |

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| Ution of the start          |                         |            |                                                                                                                                                 |                       | and power and a second second |             |           | 10101 J.14000.1.         |
|-----------------------------|-------------------------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------------|-------------|-----------|--------------------------|
| Bank<br>Reference<br>Number | Post Date               | Value Date | Description                                                                                                                                     | Transaction<br>Number |                               | Debit       | Credit    | Indicative<br>Balance 39 |
|                             |                         |            | 080143877                                                                                                                                       |                       |                               |             |           |                          |
| 11208270104<br>84 38555     | <sup>6</sup> 27/08/2012 | 27/08/2012 | Card 4***1601 2012-08<br>23 2295.00 CAD Auth<br>214675 Trace 7110654<br>VISA CA TORONTO<br>Aviva Insurance<br>Company<br>Card 4***1601 2012-08- |                       |                               | 2,409.94    |           | 7,941.98                 |
| 11208270104<br>84 38549     | <sup>6</sup> 27/08/2012 | 27/08/2012 | 23 8205.66 CAD Auth<br>221911 Trace 7110653<br>VISA CA TORONTO EI<br>Al Air 1140000000000                                                       |                       |                               | 8,616.61    |           | 10,351.92                |
| 1208170195<br>5111133       |                         | 17/08/2012 | 1Bank -<br>Commission/Fee                                                                                                                       | 106538136             |                               | <b>6.25</b> |           | 18,968.53                |
| 11208170162<br>51127        | 9 17/08/2012            | 17/08/2012 | 1Bank - Transfer-<br>Internet-Debit                                                                                                             | 106538136             |                               | 1,000.00    |           | 18,974.78                |
| 1207310105<br>10235         | 31/07/2012              | 31/07/2012 | Statement Charges                                                                                                                               |                       |                               | 3.07        |           | 19,974.78                |
| 1206290162<br>194           | 29/06/2012              | 01/07/2012 | Interest                                                                                                                                        |                       |                               | 0.05        |           | 19,977.85                |
| 1206290105<br>5975          | 29/06/2012              | 30/06/2012 | Statement Charges                                                                                                                               |                       |                               | 3.14        |           | 19,977.90                |
| 12062501431<br>992907       | 25/06/2012              | 25/06/2012 | TRANSFER<br>COMMISSION FC our<br>ref FT1206070058IN03                                                                                           |                       |                               | 12.54       |           | 19,981.04                |
| 12062501621<br>9968         | 25/06/2012              | 25/06/2012 | INWARD<br>FT1206070058IN03 by<br>BANNERSBROKER<br>LIMITE                                                                                        |                       |                               |             | 20,000.00 | 19,993.58                |
| 1205310105<br>157           | 31/05/2012              | 31/05/2012 | Statement Charges                                                                                                                               |                       |                               | 3.11        |           | -6.42                    |
| 1204300105<br>3091          | 30/04/2012              | 30/04/2012 | Statement Charges                                                                                                                               |                       |                               | 3.31        |           | -3.31                    |
|                             |                         |            |                                                                                                                                                 |                       |                               |             |           |                          |

## Tab T

OSHAWA JEWELLERY EXCHANG 740 A19 KING ST W UNIT 2432 OSHAWA: ON. L1J 2K5 945-728-5757 t visa MID: 17675500011 Term ID: 101 Ref #: 010 t Force XXXXXXXXXXXXXXXXXXXXX ; Entry Method: CHIP/MAG WISA 11:27:13 12/11/12 Appr Code: 277383 Inv #: 000010 Batch#: 000362 Apprvd 19,000,00 Total: ŧ,

.....Carebasees Copy

## **Oshawa Jewellery**

### Inc

Oshawa Centre - Unit 2432 419 King St. W. Oshawa, ON L1J 2K5 (905) 728-5757

Sold To:

#001-67389

Rajiv Dixit

Rajiv Dixit 1019 Nelson St. Unit 8 Oshawa, On L1N 3H5 905-409-5583

#### 

Price... \$16,815.00 Estimated tax... \$2,185.95 Subtotal... \$19,000.95 Less Deposit... \$19,000.95 Amount Due at pickup... \$0.00

|                                | Total                                 | \$19,000.95           |
|--------------------------------|---------------------------------------|-----------------------|
|                                | Charged to Visa Card<br>Cash Tendered | \$19,000.00<br>\$0.95 |
| Balance(s) as of 12/11/2012 11 |                                       |                       |

Special Order #001-200771-001 11/24/2012... \$2,260.00

71

RECEIPT #001-205263

12/11/2012 11:28 AM

You were assisted by

Rachel Berdugo (#41)

# Tab U

## 5 . · · + · · ·

## HARRY ROSEN

218 YDNGE STREET TORONTO.ON MSB 2H6 (4165598-8885 05/16/2013 20:49 Store# 00007 Tern# 003 Trans# 349688

OPERATOR: J CHAN SALESPERSON: 03489 Douglas Lucas

CUSTOMER: Rajib Dixit ACCOUNT: 900070049581

### DEFERRED TRANSACTION

| ARMANI MTM       |            |             |
|------------------|------------|-------------|
| 02010105-01      |            | \$3105 OU B |
| ITEN STATUS :    | TAKEN      |             |
| TAG NUMBER       | 2121829    |             |
| PRUMISED DATE :  | 05/11/2013 |             |
| PO NUMBER :      | 7-87239    |             |
| MEMO: M18 022540 | RAJIV      |             |

 ARHANI MTH

 02010105-01

 ITEM STATUS
 TAKEN

 IAG NUMBER
 : 2121828

 PROWISED DATE
 : 05/11/2013

 PO NUMBER
 : 7-87239

 MEMD.
 M15 JU280-004

\$1980\_00\_B

\$2790\_00\_B

02010108-01 JTEM STATUS : TAKEN 146 NUMBER 2121827 PROMISED DALE 05/11/2013 PO NUMBER : 7-87239 NFMD M24-LU631-216 RAJV

 ARMANI MTM
 \$3105\_00\_B

 02010105-01
 \$3105\_00\_B

 LIEM CIATUS
 1 AKEN

 LAG NUMBER
 2121966

 PROMISED DATE
 05/14/2013

 PO NUMBER
 7.87239

 MEMO: M19-LU227-008
 NICK

#### ARMANI MTM

ARMANI MTM

| 02010105-01    |               | \$3105 00 b |
|----------------|---------------|-------------|
| HEM STATUS     | : ALTERATIONS | COMPLETED   |
| IAG NUMBER     | 2121965       |             |
| PROMISED DATE  | : 05/14/2013  |             |
| PO NUMBER      | : 7-87239     |             |
| MEMO: M19-1U22 | 7-008 LORENZO |             |

| ARMANI MTM       |             |
|------------------|-------------|
| 02010105-01      | \$2925-00-B |
| ITEM STATUS      | TAKEN       |
| 1AG NUMBER       | 2121964     |
| PROMISED DATE :  | 05/14/2013  |
| PO NUMBER        | 787239      |
| MEMD: M18-022591 | LORENZO     |

| ARMANI MTM      |               |             |
|-----------------|---------------|-------------|
| 02010105-01     |               | \$3600 00 8 |
| I JEM STATUS    | 1 AKEN        |             |
| THG NUMBER      | 2121803       |             |
| PROMISED DATE   | 05/09/2013    |             |
| PO NUMBER       | 7-87239       |             |
| MEMD: M24-1 U20 | 9-404 SANJEEV |             |

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| ARMANI MTM        |                        |                  |  |  |  |  |
|-------------------|------------------------|------------------|--|--|--|--|
| 02010105-01       |                        | \$3015 QU R      |  |  |  |  |
| ITEM STATUS       | TAKEN                  |                  |  |  |  |  |
| IAG NUMBER        | 2121802                |                  |  |  |  |  |
| PROMISED DATE     | 05/09/2013             |                  |  |  |  |  |
| PO NUMBER         | 7-87239                |                  |  |  |  |  |
| MEMD: M19-022     | 2549 SANJEEV           |                  |  |  |  |  |
| 1                 |                        |                  |  |  |  |  |
| ARMANI MTM        |                        |                  |  |  |  |  |
|                   |                        | \$1800.00 B      |  |  |  |  |
| 02010108-01       | TOWEN                  | \$1000.00 B      |  |  |  |  |
| LIEM STATUS       | THKEN                  |                  |  |  |  |  |
| THU MUNDER        | . 2121001              |                  |  |  |  |  |
| PROMISED DATE     | 05/09/2013             |                  |  |  |  |  |
| PO NUMBER         | 7-87239                |                  |  |  |  |  |
| MEMD: M21-LUG     | 49-216 SAMMY           |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| ALLEN EDMONDS     | S SHOES                |                  |  |  |  |  |
| 78770401-02       |                        | \$355 00 8       |  |  |  |  |
| LIEM STATUS       | : TAKEN                |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| SHOE ACCESSOR     |                        |                  |  |  |  |  |
|                   | 1123                   | \$40.00 B        |  |  |  |  |
| 70778750-01       | 201/541                | <b>≱</b> 40.00 b |  |  |  |  |
| ITEM STATUS       | TAKEN                  |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| SHOE ACCESSOR     | RIES                   |                  |  |  |  |  |
| 70770095-01       |                        | \$14.00 B        |  |  |  |  |
| LTEM STATUS       | TAKEN                  |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| SHOE ACCESSOR     | RIES                   |                  |  |  |  |  |
| 70770137-01       |                        | \$16.00 B        |  |  |  |  |
| ITEM STATUS       | TOVEN                  |                  |  |  |  |  |
| 1101 316103       | TUNEN                  |                  |  |  |  |  |
|                   | ****                   |                  |  |  |  |  |
| SHOE ACCESSOR     | ales                   |                  |  |  |  |  |
| 70778714-01       |                        | \$11 95 B        |  |  |  |  |
| ITEM STATUS       | : TAKEN                |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| SHOE ACCESSOR     | RIES                   |                  |  |  |  |  |
| 70778750-02       |                        | \$40.00 B        |  |  |  |  |
| TIEM STATUS       | . 1AKEN                |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| ALLEN EDMONDS     |                        |                  |  |  |  |  |
| 78770467-05       | SHOLS                  | \$355 00 B       |  |  |  |  |
| ITEM STATUS       | TOKEN                  | 3555 00 B        |  |  |  |  |
| TIEN STHIUS       | 1 HALA                 |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| ALLEN EDMONDS     | SHUES                  |                  |  |  |  |  |
| 78770458-05       |                        | \$355.00 B       |  |  |  |  |
| HEM STATUS        |                        |                  |  |  |  |  |
| 201 • • • • • • • |                        |                  |  |  |  |  |
| TOTAL ITEMS:      | 17                     |                  |  |  |  |  |
|                   | SUB-TOTAL :            | \$26,611 95      |  |  |  |  |
|                   | HS1 -                  | 13.0% \$3,459 56 |  |  |  |  |
|                   | TOTAL                  | \$30,071.51      |  |  |  |  |
|                   | IUINL.                 | 10,110,000       |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| PAYMENT           | 03/02/2013             | \$30 472 66      |  |  |  |  |
| THEFT             | VVIVLILVIV             | 400) HE,00       |  |  |  |  |
| VISA              |                        | 19,000.00        |  |  |  |  |
|                   | **********             |                  |  |  |  |  |
| VISA              |                        | 11,472.66        |  |  |  |  |
| DETAIL: ****      | ************           | 73               |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| refund            | 03/16/2013             | \$401,15-        |  |  |  |  |
|                   | vj/10/2013             |                  |  |  |  |  |
| CUSTOMER CR       |                        | \$401.15-        |  |  |  |  |
|                   |                        |                  |  |  |  |  |
|                   | BALANCE DUE:           | \$0,00           |  |  |  |  |
|                   | DURINGE DAF:           | <b>₩V,VV</b>     |  |  |  |  |
|                   |                        |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
| DEFERRED NUMB     | DEFERRED NUMBER: 87239 |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
|                   |                        |                  |  |  |  |  |
|                   | *0000700872398         |                  |  |  |  |  |

Store# 00007 Term# 003 Trans# 349688 G.S.T. # R885773143

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218 YONGE STREET TORONTO.UN MSB 2H6 (416)598-8885 05/16/2013 20:52 Stare# 00007 Term# 003 Trans# 349692

OPERATOR: J CHAN SAIESPERSON: 03489 Douglas Eucas

CUSTOMER Rajib Dixit ACCOUNT 900070049581

### DEFERRED TRANSACTION

| HARRY ROSEN SPORTSHIRTS          |            |
|----------------------------------|------------|
| 51341340-04                      | 14.5 OP B  |
| TIEM STATUS : TAKEN              |            |
|                                  |            |
| HARRY ROSEN SPORTSHIRTS          |            |
| 51341343-04                      | \$125 00 B |
| ITEN STATUS : TAKEN              |            |
| POLO RLX KNITWEAR                |            |
| 04360165-05                      | \$90 00 B  |
| TEM STATUS : TAKEN               | \$90 00 B  |
| TEN STATUS : PAKEN               |            |
| HARRY ROSEN CASUAL TROUSERS      |            |
| 51370147-06                      | \$150 00 B |
| JIEM STATUS : TAKEN              |            |
|                                  |            |
| BRAX CASUAL TROUSERS             |            |
| 30370505-06                      | \$135-00 B |
| ITEM STATUS TAKEN                |            |
| MICHAEL KORS CASUAL TROUSERS     |            |
| 88370028-06                      | \$145.00 B |
| 11EM STATUS : TAKEN              | 4145.00 b  |
| TTEN STRIDS . TAKEN              |            |
| ROBERT GRAHAM KNITS              |            |
| 44360035-05                      | \$145 OG B |
| FIEM STATUS TAKEN                |            |
|                                  |            |
| POLO RLX KNITWEAR                |            |
| 04360167-05                      | \$95 OO H  |
| ITEM STATUS : TAKEN              |            |
| MICHAEL KORS SPORTSHIRTS         |            |
|                                  | \$225 00 B |
| 11EM STATUS : TAKEN              | ¥223 00 0  |
| THE STATUS . TAKEN               |            |
| HARRY ROSEN SPORTSHIRTS          |            |
| 51341359-04                      | \$178 00 B |
| JIEM STATUS · TAKEN              |            |
|                                  |            |
| POLO RLX KNITWEAR<br>04360171-04 | \$90.00 B  |
|                                  | \$90,00 5  |
| LIEM STATUS TAKEN                |            |
| LACOSTE KNITWEAR                 |            |
| 19360466-04                      | \$98 00 B  |
| FIEM STATUS TAKEN                |            |
|                                  |            |
| PULO RLX CASUAL TROUSERS         |            |
| 04370102-06                      | \$80 00 B  |
| 11EM STATUS TAKEN                |            |
|                                  |            |
| LACOSTE KNITWEAR<br>49360464-05  | \$98.00 B  |
| ITEM STATUS , TAKEN              | #V0.00 D   |
|                                  |            |
|                                  |            |

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| LACOSTE KNITU               | EOD                 |               |
|-----------------------------|---------------------|---------------|
| 49360426-05                 | L'IN I              | \$98°00 B     |
| 49360426-05.<br>TTEH STATUS | TAKEN               |               |
|                             | · ·                 |               |
| HUGO BOSS BLA               | CK LABEL DRESS PA   | 1             |
| 0511085505                  |                     | \$275 00 B    |
| ITEM STATUS                 | : TAKEN             |               |
| TAG NUMBER                  | . 2121662           |               |
|                             | : 05/09/2013        |               |
| MFMO. Sanjeev               | Sukumaran           |               |
| טונה פטעב פוע               | CK LABEL DRESS PA   | 1             |
| 05110924-05                 | GK ENDER DRESS FF   | \$295 00 B    |
|                             | : TAKEN             | \$275 QU B    |
| ITEN STATUS<br>TAG NUMBER   | 2121948             |               |
| PROMISED DATE               | 1 2121240           |               |
| RIQUESTED STO               |                     |               |
| MEMO Sanjeev                |                     |               |
|                             |                     |               |
| BRAND LABEL S               | HOES                |               |
| 53770815-07                 | TAUCH               | \$1250.00 B   |
| ITEM STATUS                 | TAKEN               |               |
| SHOE ACCESSOR               | TES                 |               |
| 70778750-03                 | 2                   | \$40.00 B     |
| LIEM STATUS                 | : TAKEN             |               |
|                             |                     |               |
| ARND LBL INTH               | ite appr            |               |
| 53745317-04                 |                     | \$68.00 B     |
| ITEM STATUS                 | : TAKEN             |               |
| BRND LBL INT                | TE APPR             |               |
| 53745312-04                 |                     | \$125.00 B    |
| ITEM STATUS                 | : TAKEN             |               |
| HBOSS INTIMAT               |                     |               |
| 05740495-02                 | C HEFRL             | \$79_00 B     |
| ITEM STATUS                 |                     | 319 00 6      |
| THEN STATUS                 | · THE               |               |
| BRND LBL INTH               | ite appr            |               |
| 53745315-04                 |                     | \$95 OU B     |
| ITEM STATUS                 |                     |               |
| IUTAL ITEMS:                | 23                  |               |
|                             | SUB-TOTAL :         | \$4,104 00    |
|                             |                     | 8.0% \$533 52 |
|                             |                     |               |
|                             | TOTAL:              | \$4,637.52    |
| PAYMENT                     | 05/04/2017          | M (77 E)      |
|                             | 05/04/2013          | \$4,637.52    |
| VISA                        |                     | 1,637.52      |
| NETAIL: ****                | ***************4253 | 5             |
|                             | DALANCE DUE.        | \$0.00        |
|                             | 860 6NG P (113P)    |               |
|                             | BALANCE DUE:        | 30.00         |
|                             |                     | 30.00         |
| DEFERRED NUME               |                     | JU, UU        |
| DEFERRED NUMB               |                     | 30.00         |
| DEFERRED NUME               |                     | <b>30</b> ,00 |

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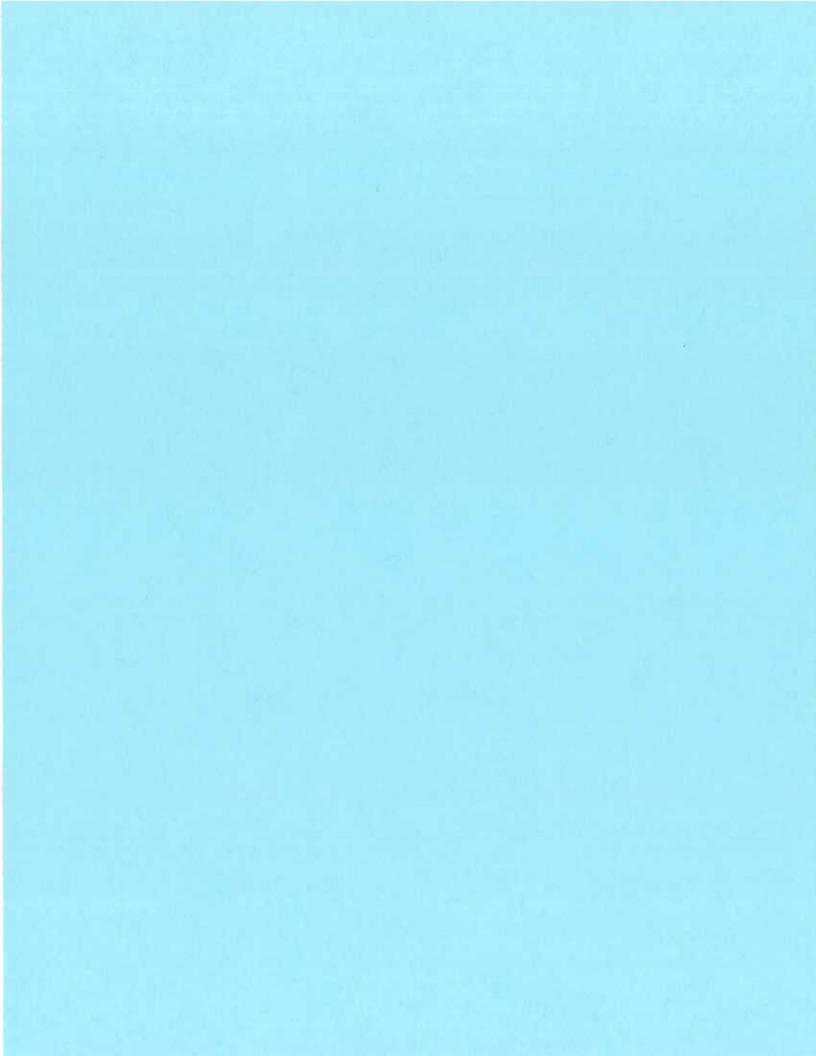
Store# 00007 Term# 003 Trans# 349692 G.S.T. # R885773143

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OUR LIGETAIRE MACYTENANCE GÚARANTEE We want to ensure that you look and feel your best in never garment you purchase from us. Thisk strength of the garment was the provident of an find yoursell in need of having a button replaced, a seam thad or other minor find yoursell in need of having a button replaced, a seam thad or other minor find yoursell in need of having a button replaced, a seam thad or other minor find yoursell in need of having a button replaced, a seam thad or other minor find yoursell in need of having a button replaced, a seam thad or other minor find yoursell in need of having a button replaced, a seam thad or other minor find yoursell for a distribution of the distribution find the distribution of orable and find the other of the distribution file toler is now if your is in Angy to make a location a should you lose or gain weight, also at no exits charge to make and provincial requesitors require that we askyou to have to make and provincial requesitors require that we askyou to have to make and provincial requesitors require that we askyou to have the distribution of the stand of you lose or gain weight, also at no exits charge.

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-120-059307

Prepared for: MR RAJIV DIXIT April 28 to May 27, 2013 Account number:

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| Trans<br>date | Post<br>date   | Description                                                                     | Spend Categories                    | Amount(\$ |
|---------------|----------------|---------------------------------------------------------------------------------|-------------------------------------|-----------|
| Card nu       | umber <b>e</b> |                                                                                 |                                     |           |
| Apr 29        | Apr 30         | DELTA AIR 006217 <b>0398331D</b> ORVAL QC<br>250.00 USD @ 1.04 <b>2920000**</b> | Foreign Currency Transactions       | 260.7     |
| Apr 30        | May 01         | THE BRICK-WHITBY WHITBY ON                                                      | Home and Office Improvement         | 6,847.5   |
| Apr 30        | May 01         | FEDEX TRADE NETWORKS MISSISSAUGA ON                                             | Professional and Financial Services | 48.0      |
| Арг 30        | May 01         | WARREN'S PRINTING PLACE WHITBY ON                                               | Professional and Financial Services | 621.5     |
| Apr 30        | May 01         | DR. BERNARD RUBIN DENT. OSHAWA ON                                               | Health and Education                | 815.00    |
| May 01        | May 02         | PAYPAL *HIKARISOFTW 4029357733 ON                                               | Professional and Financial Services | 54.4      |
| May 01        | May 02         | FOX PROMOTIONS TORONTO ON                                                       | Hotel, Entertainment and Recreation | 33,900.00 |
| May 01        | May 02         | BEST BYTE, BUSINESS BUNDLWHITBY ON                                              | Professional and Financial Services | 11,105.07 |
| May 01        | May 03         | The Westin War <b>szawa</b><br>19,309.84 Pln @ 0.329772800**                    | Foreign Currency Transactions       | 6,367.80  |
| May 01        | May 03         | THE WESTIN WARSZAWA<br>80. <b>00 PL</b> N @ 0.329750090**                       | Foreign Currency Transactions       | 26,38     |
| May 02        | May 03         | CTO*CITRIX ONLINE.COM 800-853-1185 CA<br>641.94 USD @ 1.036389694**             | Foreign Currency Transactions       | 665.30    |
| May 02        | May <b>03</b>  | APL*APPLE ITUNES STORE 800-676-2775 ON                                          | Hotel, Entertainment and Recreation | 1.12      |
| May 02        | May 03         | APL*APPLE ITUNES STORE 800-676-2775 ON                                          | Hotel, Entertainment and Recreation | 58.73     |
| May 02        | May 03         | DURHAM RADIO INC OSHAWA ON                                                      | Home and Office Improvement         | 2,243.05  |
| May 02        | May 03         | DURHAMKIA OSHAWA ON                                                             |                                     | 5,000.00  |
| Vlay 02       | May 03         | BUYAIRSOFT RED DEER COUNAB                                                      | Retail and Grocery                  | 900.66    |
| May 03        | May 06         | BIN THERE DUMP THAT WHITBY ON                                                   | Home and Office Improvement         | 256.23    |
| May 03        | May 06         | FOX PROMOTIONS TORONTO ON                                                       | Hotel, Entertainment and Recreation | 1,582.00  |
| May 03        | May 06         | MACDONALD SAGER MANIS LLPTORONTO ON                                             | Professional and Financial Services | 4,551.50  |
| May 03        | May 06         | PRECISE PARKLINK INC TORONTO ON                                                 | Transportation                      | 13.50     |
| May 03        | May 07         | UNITED AIR 0163925797225CONTINENTAL NS                                          | Transportation                      | 803.72    |
| May 03        | May 07         | TAP PORTUGAL473925785863901 LISBOA                                              | Transportation                      | 496,19    |
| May 04        | May 06         | HOSTGATOR 7135745287 TX                                                         | Professional and Financial Services | 15.60     |
| May 04        | May 06         | HOCKEY HALL OF FAME TORONTO ON                                                  | Hotel, Entertainment and Recreation | 485.84    |
| Aay 04        | May 06         | GOLF TOWN #16 WHITBY ON                                                         | Hotel, Entertainment and Recreation | 2,701.68  |
| May 04        | May 06         | HARRY ROSEN # FOO7 TORONTO: ON                                                  | Retail and Grocery                  | 4,637.52  |
| Лау 04        | May 06         | ROOTS #113 TORONTO ON                                                           | Retail and Grocery                  | 212.44    |
| Лау 04        | May 06         | APPLE STORE #R121 TORONTO ON                                                    | Home and Office Improvement         | 3,143.95  |
| Aay 04        | May 06         | CINEPLEX 7289 OSHAWA ON                                                         | Hotel, Entertainment and Recreation | 133.90    |
| Лау 04        | May 06         | EVOLV HEALTH CANADA INC BRANDON MB                                              | Retail and Grocery                  | 73,49     |
| Лау 04        | May 06         | SILVERIS TECHNOLOGIES CORNEWMARKET ON                                           | Personal and Household Expenses     | 22.58     |
| Лау 05        | May 06         | APL*APPLE ITUNES STORE 800-676-2775 ON                                          | Hotel, Entertainment and Recreation | 3.38      |
| Лау 05        | May 06         | APL*APPLE ITUNES STORE 800-676-2775 ON                                          | Hotel, Entertainment and Recreation | 10.32     |
| May 05        | May 06         | LOWES #02741* OSHAWA ON                                                         | Home and Office Improvement         | 284.13    |
| /lay 05       | May 06         | PETSMART INC 0934 WHITBY ON                                                     | Personal and Household Expenses     | 77.43     |
| /lay 05       | May 06         | SURE FIT OUTLET AJAX ON                                                         | Nome and Office Improvement         | 299.20    |
| Aay 05        | May 06         | GOLF TOWN #16 WHITBY ON                                                         | Hotel, Entertainment and Recreation |           |
| Aay 05        | May 06         | GOLF TOWN #16 WHITBY ON                                                         | Hotel, Entertainment and Recreation | 1,355.98  |
| Aay 05        | May 07         | THE HOME DEPOT #7005 WHITBY ON                                                  | Home and Office Improvement         |           |
| 1ay 06        | May 07         | FOX PROMOTIONS TORONTO ON                                                       | Hotel, Entertainment and Recreation | 2,542.50  |
| 1ay 06        | May 07         | FOX PROMOTIONS TORONTO ON                                                       | Hotel, Entertainment and Recreation | -1,582.00 |
| 1ay 06        | May 07         | MACDONALD SAGER MANIS LLPTORONTO ON                                             | Professional and Financial Services | 1,273.50  |

### Your new charges and credits (continued)

Page 3 of 7

# Tab V

| actionHistory.faces                          | https://newdb.ba                                              | ankofcyprus.com/netteller/Tra | ansactionHistory.fac         |
|----------------------------------------------|---------------------------------------------------------------|-------------------------------|------------------------------|
| 1bank                                        | Bank of Cyprus                                                |                               |                              |
|                                              | 05/03/2013 3.21 AM                                            |                               | 747                          |
| ransaction History                           |                                                               |                               |                              |
| ccount Details                               |                                                               |                               |                              |
| ccount Number:                               | Last Transactions:                                            |                               |                              |
| vailable Balance:                            | ROKER LIMITED From Date: 05/03/2012                           |                               |                              |
| urrent Balance:                              | 283961.15 USD 06/03/2013 295107.42 USD                        |                               |                              |
| nk                                           | Transaction                                                   |                               |                              |
| ference Post Date Value Date<br>mber         | Description Number                                            | Debit                         | Credit Indicative<br>Balance |
| 3030501621<br>05/03/2013 05/03/2013<br>31137 | "AB" COMMISSION<br>DIFFERENT CUST our<br>ref FT13030535890AAB | 6.52                          | 295,107.42                   |
|                                              | Transfer<br>FT1303053589OAAB to                               |                               |                              |
| 030501621 <sub>05/03/2013</sub> 05/03/2013   | DREAMSCAPE<br>VENTURES a/c                                    | 100,000.00                    | 295,113.94                   |
|                                              | ng services invoice<br>number 0134<br>Card 4***601 2013-03-   |                               |                              |
| 030401046<br>53459 04/03/2013 04/03/2013     | 02 19000.00 CAD Auth<br>227440 Trace 1387560                  | 40.000.04                     | 205 110 01                   |
| 53459 04/03/2013 04/03/2013                  | VISA CA TORONTO<br>Harry Rosen F007                           | 19,223.34                     | 395,113.94                   |
| 030401621<br>43 04/03/2013 04/03/2013        | CHARGES OUR our ref<br>FT1303040018OACY                       | 13.02                         | 414,337.28                   |
|                                              |                                                               |                               |                              |
|                                              |                                                               |                               | Page 1                       |

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| 10113400001111              | 0001 9.1400             |            |                                                                                                                                                              |                       | heponime | , consecutive | ere prabiet | a notion indi | Dise ci Olili I | 10101 9.14000 . 1     |
|-----------------------------|-------------------------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------|---------------|-------------|---------------|-----------------|-----------------------|
| Bank<br>Reference<br>Number | Post Date               | Value Date | Description                                                                                                                                                  | Transaction<br>Number |          |               |             | Debit         | Credit          | Indicative<br>Balance |
| 11212270162<br>23413        | <sup>1</sup> 27/12/2012 | 27/12/2012 | Transfer<br>FT12122709390AAB to<br>DREAMSCAPE<br>VENTURES a/c<br>TRANS<br>FER                                                                                |                       |          |               |             | 50,000.00     |                 | 748<br>492,408.49     |
| 11212270162<br>425265       | <sup>1</sup> 27/12/2012 | 27/12/2012 | TRANSFER<br>COMMISSION our ref<br>FT12122707020ACY                                                                                                           |                       |          |               |             | 15.00         |                 | 542,408.49            |
| 11212270162<br>425263       | <sup>1</sup> 27/12/2012 | 27/12/2012 | PROCESSING FEES<br>our ref<br>FT12122707020ACY<br>OUTWARD                                                                                                    |                       |          |               |             | 15.87         |                 | 542,423.49            |
| 11212270162<br>42555        | 27/12/2012              | 27/12/2012 | FT1212270702OACY to<br>STELLAR POINT INC<br>a/c                                                                                                              |                       |          |               |             | 10,000.00     |                 | 542,439.38            |
| 11212270162<br>22357        |                         | 27/12/2012 | CHARGES OUR our ref<br>FT12122703340ACY                                                                                                                      |                       |          |               |             | 46,30         |                 | 552,439.36            |
| 11212270162<br>223185       | 27/12/2012              | 27/12/2012 | TRANSFER<br>COMMISSION our ref<br>FT12122703340ACY                                                                                                           |                       |          |               |             | 50.52         |                 | 552,485.66            |
| 11212270162<br>223183       | 27/12/2012              | 27/12/2012 | PROCESSING FEES<br>our ref<br>FT12122703340ACY<br>OUTWARD                                                                                                    |                       |          |               |             | 15.87         |                 | 552,536.18            |
| 112122701621<br>22355       | 27/12/2012              | 27/12/2012 | FT1212270334OACY to<br>JIM COLEMAN<br>AUTOMOTI a/c<br>1000031605909>TRAN<br>SIT 061000104<br>BRANCH PHONE<br>NUMBER 14105318629<br>RAJKUMAR DIXIT<br>VEHICLE |                       |          |               |             | 33,677.00     |                 | 552,552.05            |
| 112122701431<br>7993329     | 27/12/2012              | 28/12/2012 | TRANSFER<br>COMMISSION our ref                                                                                                                               |                       |          |               |             | 52.91         |                 | 586,229.05            |
|                             |                         |            |                                                                                                                                                              |                       |          |               |             |               |                 |                       |

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| <br>insaction fistor y.iac             | 05         |                                                                                                                      |                       | https://newdo.oalikoleypius.com/nettenet/ma | isaction | usiory.races          |
|----------------------------------------|------------|----------------------------------------------------------------------------------------------------------------------|-----------------------|---------------------------------------------|----------|-----------------------|
| Bank<br>Reference Post Date<br>Number  | Value Date | Description                                                                                                          | Transaction<br>Number | Debit                                       | Credit   | Indicative<br>Balance |
|                                        |            | 42371>STELLAR<br>POINT ISRAEL LTD                                                                                    |                       |                                             |          | 744                   |
| 11212310105<br>59553 31/12/2012        | 31/12/2012 | Statement Charges                                                                                                    |                       | 3.30                                        |          | 467,639.21            |
| 112123101046<br>84 41123<br>84 41123   | 31/12/2012 | Card 4***1601 2012-12<br>28 18000.00 USD Auth<br>248779 Trace 6328312<br>VISA US 516-4325900<br>Air Charter Service  |                       | 18,556.70                                   |          | 467,642.51            |
| 112123101439<br>31/12/2012<br>5001537  | 02/01/2013 | TRANSFER<br>COMMISSION our ref<br>FT1212310173IN03                                                                   |                       | 13.18                                       |          | 486,199.21            |
| 112123101629<br>31/12/2012<br>6008     | 02/01/2013 | INWARD<br>FT1212310173IN03 by<br>CEO - CONSULTORIA<br>DE                                                             |                       |                                             | 9,990.00 | 486,212.39            |
| 112123101045<br>84 96881               | 31/12/2012 | Card 4***1601 2012-12-<br>26 6724.38 CAD Auth<br>272191 Trace 6263449<br>VISA CA OSHAWA<br>Furniture Galleries       |                       | 7,047.23                                    |          | 476,222.39            |
| 112123101046<br>84 96875               | 31/12/2012 | Card 4***1601 2012-12-<br>28 7500.00 CAD Auth<br>213600 Trace 6263448<br>VISA CA 905-4330011<br>Www Adventistgiving  |                       | 7,860.10                                    |          | 483,269.62            |
| 112123101046<br>31/12/2012<br>84 45299 | 31/12/2012 | Card 4***1601 2012-12-<br>26 1234.00 USD Auth<br>280802 Trace 6210947<br>VISA US 800-285-2684<br>Paradise Island Vac |                       | 1,272.16                                    |          | 491,129.72            |
| 112122701621<br>234399<br>234399       | 27/12/2012 | "AB" COMMISSION<br>DIFFERENT CUST our<br>ref FT12122709390AAB                                                        |                       | 6.61                                        |          | 492,401.88            |
|                                        |            |                                                                                                                      |                       |                                             |          |                       |

## Tab X

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| ransaotron ristor j.raot               | 0          |                                                                                                                                                                | http://doi.outicologpius.com/ionorien in | 2.10 averon |                       |     |
|----------------------------------------|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|-------------|-----------------------|-----|
| Bank<br>Reference Post Date<br>Number  | Value Date |                                                                                                                                                                | Transaction Debit                        | Credit      | Indicative<br>Balance |     |
| 113010701046<br>84 46673               | 07/01/2013 | 6759708 VISA BS<br>NASSAU Atlantis Royal<br>Towers Fro<br>Card 4***1601 2013-01-<br>01 95.50 USD Auth<br>244750 Trace 6555589<br>VISA BS NASSAU<br>Senor Frogs | 98,45                                    |             | 594,979.76            | 75( |
| 1130107D1045<br>84 46667<br>84 46667   | 07/01/2013 | Card 4***1601 2013-01-<br>01 249.00 USD Auth<br>234308 Trace 6555588<br>VISA BS NASSAU<br>Atlantis Kodak Photo<br>Shop<br>Card 4***1601 2013-01-               | 256.70                                   |             | 595,078.21            |     |
| 113010701048<br>07/01/2013<br>84 46661 | 07/01/2013 | 01 12400.00 USD Auth<br>244510 Trace 6555587<br>VISA BS PARADISE<br>ISLA John Bull                                                                             | 12,783.51                                |             | 595,334.91            |     |
| 113010701046<br>07/01/2013<br>84 95085 | 07/01/2013 | Card 4***1601 2013-01-<br>02 213.99 CAD Auth<br>286773 Trace 6668127<br>VISA CA<br>CONTINENTAL United<br>Air 016320321                                         | 225.20                                   |             | 608,118.42            |     |
| 113010701048<br>07/01/2013<br>84 95079 | 07/01/2013 | Card 4***1601 2013-01-<br>02 213.99 CAD Auth<br>286773 Trace 6668126<br>VISA CA<br>CONTINENTAL United<br>Air 016320321                                         | 225.20                                   |             | 608,343.62            |     |
| 113010701046<br>07/01/2013<br>84 47144 | 07/01/2013 | Card 4***1601 2013-01-<br>03 15.76 CAD Auth<br>00000 Trace 6612433<br>VISA CA 800-367-3476<br>Expedia travel                                                   |                                          | 16.43       | 608,568.82            |     |

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| <br>moderioniti             | J.01 J.1400 | φ.         |                                                                                                                     | https://iewdo.baikoteypius. | .com/nettenet/ 11ansa | icuom i | 13101 y.14005 (1      |
|-----------------------------|-------------|------------|---------------------------------------------------------------------------------------------------------------------|-----------------------------|-----------------------|---------|-----------------------|
| Bank<br>Reference<br>Number | Post Date   | Value Date | Description                                                                                                         | Transaction<br>Number       | Debit                 | Credit  | Indicative<br>Balance |
| 113030401621<br>223193      |             | 04/03/2013 | TRANSFER<br>COMMISSION our ref<br>FT13030400180ACY                                                                  |                             | 15.00                 |         | 414,35078015 1        |
| 113030401621<br>223191      | 04/03/2013  | 04/03/2013 | PROCESSING FEES<br>our ref<br>FT13030400180ACY<br>OUTWARD                                                           |                             | 15.62                 |         | 414,365.30            |
| 113030401621<br>22341       | 04/03/2013  | 04/03/2013 | FT13030400180ACY to<br>MR JAIME PEREIRA<br>DE a/c<br>ICED TO COVER<br>OFFICE EXPENSE                                |                             | 10,000.00             |         | 414,380.92            |
| 113030401046<br>84 39471    | 04/03/2013  | 04/03/2013 | Card 4***1601 2013-02-<br>28 95.60 CAD Auth<br>275843 Trace 1267227<br>VISA CA WHITBY Lux<br>Limo                   |                             | 96.67                 |         | 424,380.92            |
| 113030401046<br>84 39465    | 04/03/2013  | 04/03/2013 | Card 4***1601 2013-02-<br>28 155.80 CAD Auth<br>277054 Trace 1267229<br>VISA CA WHITBY Lux<br>Limo                  |                             | 157.54                |         | 424,477.59            |
| 113030401046<br>84 39459    | 04/03/2013  | 04/03/2013 | Card 4***1601 2013-02-<br>28 117.76 CAD Auth<br>275472 Trace 1267230<br>VISA CA WHITBY Lux<br>Limo                  |                             | 119.07                |         | 424,635.13            |
| 113030401046<br>84 39453    | 04/03/2013  | 04/03/2013 | Card 4***1601 2013-02-<br>28 83.20 CAD Auth<br>276301 Trace 1267228<br>VISA CA WHITBY Lux<br>Limo                   |                             | 84.12                 |         | 424,754.20            |
| 113030401046<br>84 39447    | 04/03/2013  | 04/03/2013 | Card 4***1601 2013-02-<br>28 8000.00 GBP Auth<br>256185 Trace 1267226<br>VISA GB T5<br>HEATHROW Tiffany &<br>Co Ltd |                             | 12,580.19             |         | 424,838.32            |

| RAJIV DIXIT et al.<br>Defendants<br>Court File No.                                                         | ONTARIO<br>SUPERIOR COURT OF JUSTICE<br>(COMMERCIAL LIST)<br>PROCEEDING COMMENCED AT<br>TORONTO | MOTION RECORD<br>VOLUME II OF II | <b>Cassels Brock &amp; Blackwell LLP</b><br>2100 Scotia Plaza<br>40 King Street West<br>Toronto, ON M5H 3C2 | <b>David S. Ward LSUC#: 33541W</b><br>Tel: 416-869-5960<br>Fax: 416-640-3154<br>dward@casselsbrock.com | Christopher Horkins LSUC #: 61880R<br>Tel: 416.815.4351<br>Fax: 416.642.7129<br>chorkins@casselsbrock.com | Lawyers for the Plaintiff |  |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------|--|
| BANNERS BROKER INTERNATIONAL LTD. by its receiver, and RAJIV DIXI<br>MSI SPERGEL INC., et al<br>Plaintiffs |                                                                                                 |                                  |                                                                                                             |                                                                                                        |                                                                                                           |                           |  |