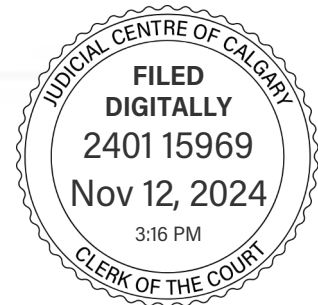


COURT FILE NUMBER 2401-  
COURT COURT OF KING'S BENCH OF ALBERTA  
JUDICIAL CENTRE Calgary

Clerk's Stamp

IN THE MATTER OF THE COMPANIES  
CREDITORS ARRANGEMENT ACT, RSC 1985, c  
C-36, as amended

AND IN THE MATTER OF THE COMPROMISE  
OR ARRANGEMENT OF ANGUS A2A GP INC.,  
ANGUS MANOR PARK A2A GP INC., ANGUS  
MANOR PARK A2A CAPITAL CORP., ANGUS  
MANOR PARK A2A DEVELOPMENTS INC.,  
WINDRIDGE A2A GP INC., WINDRIDGE A2A  
DEVELOPMENTS, LLC, FOSSIL CREEK A2A  
GP INC., FOSSIL CREEK A2A  
DEVELOPMENTS, LCC, A2A  
DEVELOPMENTS INC., SERENE COUNTRY  
HOMES (CANADA) INC. and A2A CAPITAL  
SERVICES CANADA INC.



DOCUMENT **AFFIDAVIT**

ADDRESS FOR SERVICE AND Robyn Gurofsky/Kaitlyn Wong  
Fasken Martineau DuMoulin LLP  
CONTACT INFORMATION OF 3400, 340 7<sup>th</sup> Avenue SW  
Calgary, AB T2P 3N9  
PARTY FILING THIS Telephone: (403) 261-9469  
Email: rgurofsky@fasken.com / kwong@fasken.com  
DOCUMENT File No. 321102-00017

**AFFIDAVIT OF ISABELLE BROUSSEAU**

Sworn on November 8, 2024

I, Isabelle Brousseau, of the town of St. Paul, in the Province of Alberta, SWEAR AND SAY THAT:

- 1) I am 85 years old and retired as a teacher in or around 1994. I am an investor in Angus Manor Park. As such, I have personal knowledge of the matters hereinafter sworn to in this Affidavit, except where stated to be based on information and belief, and where so stated, I verily believe the same to be true.
- 2) I make this Affidavit to supplement the Affidavit sworn by Michael Edwards and my financial advisor, Paul Lauzon, who sold the Angus Manor Park investment to me.
- 3) I was introduced to the A2A Group by Mr. Lauzon who handled my investments. I was told that I could invest in a real estate development in Ontario, which I understand to be Angus Manor Park. I did not attend any presentation; the investment was solicited over the phone.
- 4) In total, I invested \$15,000 and received Angus Manor LP units. Attached hereto and marked as **Exhibit "A"** is a copy of the LP unit certificate I received.
- 5) Since purchasing the Angus Manor LP units, I have not received any reporting from the A2A Group of Companies or Angus Manor Park, whether it be financial reporting or any reporting on the status of the Angus Manor development. Nor have I received any notice of a potential sale of Angus Manor Park. I have been in total darkness about everything.
- 6) Further, I have not received any distributions or repayments from Angus Manor or the A2A

S.B

Group.

- 7) As a result of the complete lack of information provided by the A2A Group since I invested in 2015, I have significant concerns about the A2A Group remaining in control of and selling the property. I also have significant concerns about whether the money I put in was recorded by the A2A Group in their records as a unit holder of Angus LP and am further concerned about what they did with the money I invested.
- 8) I make this affidavit in support of an application to put members of the A2A Group, and in particular those involved with the Angus Manor project, into a court process that will provide me with some transparency into what happened with my money.
- 9) In swearing this Affidavit, I was not physically present before the commissioner for oaths but was linked with the commissioner for oaths utilizing video technology and, to the best of my knowledge, the process described in Court of King's Bench of Alberta Notice to the Profession and Public on Remote Commissioning of Affidavits for use in Civil and Family Proceedings during the COVID-19 pandemic dated March 25, 2020 was followed.

SWORN BEFORE ME at St. Paul, Alberta, this )  
8<sup>th</sup> day of November, 2024. )

\_\_\_\_\_  
Commissioner for Oaths in and for Alberta

) *Isabelle Brousseau*  
) ISABELLE BROUSSEAU

J.B

COURT FILE NUMBER      **2401-**  
COURT                      COURT OF KING'S BENCH OF ALBERTA  
JUDICIAL CENTRE        Calgary

Clerk's Stamp

IN THE MATTER OF THE *COMPANIES'*  
*CREDITORS ARRANGEMENT ACT*, RSC 1985,  
c C-36, as amended

AND IN THE MATTER OF THE  
COMPROMISE OR ARRANGEMENT OF  
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A2A GP INC., ANGUS MANOR PARK A2A  
CAPITAL CORP., ANGUS MANOR PARK  
A2A DEVELOPMENTS INC., WINDRIDGE  
A2A GP INC., WINDRIDGE A2A  
DEVELOPMENTS, LLC, FOSSIL CREEK A2A  
GP INC., FOSSIL CREEK A2A  
DEVELOPMENTS, LCC, A2A  
DEVELOPMENTS INC., SERENE COUNTRY  
HOMES (CANADA) INC. and A2A CAPITAL  
SERVICES CANADA INC.

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ADDRESS FOR SERVICE AND      Robyn Gurofsky/Kaitlyn Wong  
CONTACT INFORMATION OF      Fasken Martineau DuMoulin LLP  
PARTY FILING THIS              3400, 340 7<sup>th</sup> Avenue SW  
DOCUMENT                      Calgary, AB T2P 3N9  
   Telephone: (403) 261-9469  
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**AFFIDAVIT OF ISABELLE BROUSSEAU**

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KW

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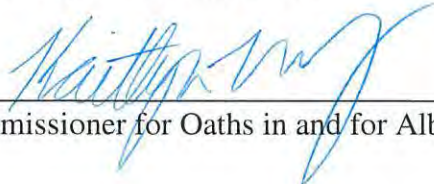
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KW



Profession and Public on Remote Commissioning of Affidavits for use in Civil and Family Proceedings during the COVID-19 pandemic dated March 25, 2020 was followed.

SWORN BEFORE ME at St. Paul, Alberta,  
this 8<sup>th</sup> day of November, 2024.

  
\_\_\_\_\_  
Commissioner for Oaths in and for Alberta

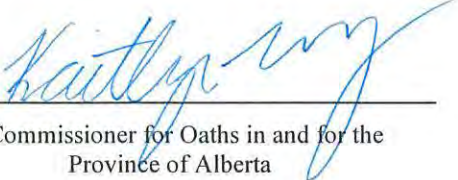
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\_\_\_\_\_  
ISABELLE BROUSSEAU

**Kaitlyn Wong**  
Barrister & Solicitor  
3400, 350 7<sup>th</sup> Avenue SW  
Calgary, Alberta T2P3N9  
Ph: 1-403-261-7388

KW

This is Exhibit "A"  
Referred to in the Affidavit of  
ISABELLE BROUSSEAU  
Sworn before me this 8<sup>th</sup> day of  
November, 2024

  
A Commissioner for Oaths in and for the  
Province of Alberta

**Kaitlyn Wong**  
Barrister & Solicitor  
3400, 350 7<sup>th</sup> Avenue SW  
Calgary, Alberta T2P3N9  
Ph: 1-403-261-7388

The transfer or assignment of Units represented by this certificate is restricted and is subject to the provisions of a limited partnership agreement dated October 24, 2014, as it may be amended from time to time.

**ANGUS A2A LIMITED PARTNERSHIP**

**UNIT CERTIFICATE**

Certificate No.: No. 9


Number of Units: 150

This certifies that **Isabelle Brousseau** is the registered holder of **150 Units** in the Angus A2A Limited Partnership, a partnership formed under the *Partnership Act* (Alberta) pursuant to an agreement dated and made effective October 24, 2014. The 150 Units are subject to the terms of that agreement.

Dated: June 17, 2015

ANGUS A2A LIMITED PARTNERSHIP by  
ANGUS A2A GP INC. being the General  
Partner:

Per:

  
Grayson Ambrose, Authorized  
Signatory

**CERTIFIED TRUE  
COPY:**

**Darren M. Smits**  
*Barrister & Solicitor*




*I.B.*



### CERTIFICATE OF COMMISSIONER FOR OATHS

The undersigned Commissioner of Oaths certifies that the enclosed Affidavit was declared utilizing video technology following the process described in the Court of King's Bench of Alberta Notice to the Profession and Public *RE: Remote Commissioning of Affidavits for Use in Civil and Family Proceedings During the COVID-19 Pandemic* dated March 25, 2020 for remote commissioning of affidavits. The undersigned is satisfied that the process was necessary because it was impossible or unsafe, for medical reasons, for the deponent of the affidavit and the undersigned commissioner to be physically present together.

DATED at Calgary, Alberta on this 8<sup>th</sup> day of November, 2024.

  
\_\_\_\_\_  
Commissioner for Oaths in and for the  
Province of Alberta

**Kaitlyn Wong**  
Barrister & Solicitor  
3400, 350 7<sup>th</sup> Avenue SW  
Calgary, Alberta T2P3N9  
Ph: 1-403-261-7388