

Clerk's Stamp

COURT FILE NUMBER 2401-15969

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

PROCEEDINGS IN THE MATTER OF THE COMPANIES'  
CREDITORS ARRANGEMENT ACT, RSC 1985, c. C-  
36, AS AMENDED

AND IN THE MATTER OF A PLAN OF  
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., HILLS OF 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 CONTACT  
INFORMATION OF PARTY  
FILING THIS DOCUMENT

MILES DAVISON LLP  
Barristers and Solicitors  
900, 517 – 10th Avenue S.W.  
Calgary, Alberta T2R 0A8  
Attention: Daniel Jukes  
Telephone: (403) 298-0327  
Facsimile: (403) 263-6840  
djukes@milesdavison.com  
File: 57066 DKJ

**AFFIDAVIT OF GRAYSON JAMES AMBROSE**  
**Sworn January 3, 2025**

I, Grayson James Ambrose, of the City of Calgary, in the Province of Alberta, SWEAR AND SAY  
THAT:

1. I make this affidavit further to my affidavits sworn November 21, 2024, and December 13,  
2024 (hereinafter, collectively, my "Previous Affidavit").

-2-

2. Due to the short period of time and urgency to provide documents to the monitor, we were unable to reconcile the Client Service Distribution Lists to the requests for updates to client information, Financial Records, Subscription Agreements, and Title/APS.
3. Upon further investigation I now believe that the UFIs referred to in my Previous Affidavit for Angus Park Manor are correctly spread over the two parcels of property, namely, 58103-0065 LT and 58103-0059 LT.
4. To the best of my knowledge and belief, 212 UFIs were sold to the Angus A2A LP for approximately \$5,000 per UFI. Cross referencing is needed to verify.
5. To the best of my knowledge and belief, the 65 units in Angus Manor LP appear to have been incorrectly allocated on the APS's @ \$10,000/UFI. Cross referencing is needed to verify.
6. To the best of my knowledge and belief, there was an APS for 16,16,33 units each, for a total of 65 units. I believe that 23 units from Batch 133 may have been lost in transition of staffing. I am now shown a copy of my calculations attached as **Exhibit A**. Accordingly, I believe that the total is 88units for \$880,000.00. This results to \$5,355.00/UFI,  $\$880,000 / \$5,355 = 164.33$  or 164 UFI. Cross referencing is needed to verify the exact amount. This is in process and any correction needed to be adjusted on title.
7. Between December 15, 2024, and December 30, 2024, I repeatedly wrote to Friedmans LLP to obtain the applicable sales agreements and accounting data including *all the invoices that were charged to the Angus Manor project since inception* and the *Statement of Accounts*. Our lawyers have also followed up on my urgent request e-mails. We have e-mailed Melissa Johnson, Bill Friedman, Keerthika Srikamalan of Friedmans LLP. The e-mails were all not responded to until January 2, 2025, when Melissa Johnson wrote:

*Happy New Year. We are working on your request but due to the length of time that has passed since the billings and the end of year holidays, it has taken some time. It is currently being reviewed and will be forwarded to you as soon as we are able. Thank you.*

8. I make this affidavit to the best of my knowledge and belief, in support of A2A's position, and for no other or improper purpose.

-3-

**DECLARED BEFORE ME**, by audio-visual communication technology via Zoom on

January 3, 2025

With the commissioner being in the City of Markham, Province of Ontario during the video conference with the deponent being in the City of Calgary in the Province of Alberta during the video conference

DocuSigned by:  
*Edward Wing-Chung Choi*  
E3507F7EECB6411...

Signed by:  
*Grayson Ambrose*  
EE4AC7384D4A424...

Commissioner for Taking Affidavits  
(or as may be)

Edward Wing-Chung Choi

(Signature of deponent)

Grayson Ambrose

RCP-E 4D (February 1, 2021)

\*Via Video Conferencing

\* Executed pursuant to the *Electronic Commerce Act*

This is Exhibit “A” referred to in the Affidavit of Grayson James Ambrose, sworn on

DocuSigned by:  
*Edward Wing-Chung Choi*  
E3507F7EECB6411...

---

Commissioner for Taking Affidavits (or as may be)

Edward Wing-Chung Choi

## Exhibit "A"

Angus Manor Ownership					
	Title	Title	Financial Records <sup>(1)</sup>	Investor Records <sup>(2)</sup>	
Offshore Investors	1,130				
Angus LP	228	228	249	167	
Angus Manor LP	49	49	121	173	
Angus Manor Development	893				
<b>Total</b>	<b>2,300</b>	<b>277</b>	<b>370</b>	<b>340</b>	
<b>Note 1:</b>			Price per UFI	Implied UFI	Rounded Down
26000 · LB Client Deposit 1					
26459 · Angus LP		1,249,000	\$ 5,000	249.8	249.0
26461 · Angus Manor Park A2A LP		648,900	\$ 5,355	121.2	121.0
		<b>1,897,900</b>			<b>370</b>
<b>Note 2:</b>			Price per UFI	Implied UFI	Rounded Down
Angus Manor Capital		836,885	\$ 5,000	167.4	167
Angus Manor LP		929,000	\$ 5,355	173.5	173
		<b>1,765,885</b>			<b>340</b>

BATCH 129										
	1	Sent to Bill	05-Aug-16	Angus Manor Park A2A Capital Corporation		16\2300	0.69565%	\$ 160,000.00	16	19-Jul-16
BATCH 130										
	1	Sent to Bill	05-Oct-16	Angus Manor Park A2A Capital Corporation		16\2300	0.69565%	\$ 160,000.00	16	19-Jul-16
BATCH 132										
	1	Sent to Bill	18-Nov-16	Angus Manor Park A2A Capital Corporation		33\2300	1.43478%	\$ 330,000.00	33	31-Oct-16
BATCH 133										
	1	docs pending		Angus Manor Park A2A Capital Corporation		23\2300	1.00000%	\$ 230,000.00	23	07-Dec-16
BATCH 131										
	1	Sent to Bill	18-Nov-16	AMP A2A LP - Grayson (discount of \$5000/unit)		2\2300	0.08696%	\$ 20,000.00	2	19-Jul-16

MICHAEL EDWARDS et al.

-and-

A2A CAPITAL SERVICES CANADA INC. et al.

Court File No. 2401-15969

**COURT OF KING'S BENCH OF ALBERTA**

CALGARY

**AFFIDAVIT**

**METCALFE, BLAINEY & BURNS LLP**

Suite 202, 18 Crown Steel Drive, Markham ON L3R 9X8

**Kien Chong Sammy Lee**

**LSO# 33821E**

*sammylee@mbb.ca*

Tel: 905-475-7676 ext. 327

**GOLDMAN HINE LLP**

2410-401 Bay St Toronto, Ontario M5H 2Y4

**Stephen Barbier**

**LSO# 49260C**

Tel: 416 867 9700

**MILES DAVISON LLP**

900, 517 10th Avenue SW, Calgary, AB T2R 0A8

**Dan Jukes**

Tel: 403 298-0333

Lawyers for

Angus A2A GP Inc.

Angus Manor Park A2A GP Inc.

Angus Manor Park A2A Capital Corp.

Angus Manor Park A2A Developments Inc.

A2A Developments Inc.

RCP-F 4C (September 1, 2020)