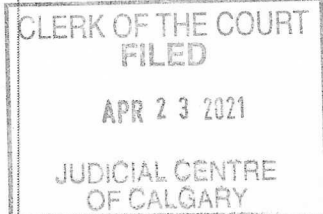


Clerk's Stamp



COURT FILE NO. 1801-04745

COURT Court of Queen's Bench of Alberta

JUDICIAL CENTRE Calgary

PLAINTIFF(S) **HILLSBORO VENTURES INC.**DEFENDANT(S) **CEANA DEVELOPMENT SUNRIDGE INC.  
IN THE MATTER OF RECEIVERSHIP OF CEANA DEVELOPMENT  
SUNRIDGE INC.**DOCUMENT **Affidavit**

ADDRESS FOR  
SERVICE AND  
CONTACT  
INFORMATION OF  
PARTY FILING THIS  
DOCUMENT

Mounir Alein  
284119 Meadow Ridge Lane  
Rockyview County, AB T1Z 0J4  
Ph: 403 273 1083  
Email: m.alein@hotmail.com

**AFFIDAVIT OF****Mounir Alein**

Sworn (or Affirmed) on

*April 20, 2021*

I, Mounir Alein

of Alberta, SWEAR/AFFIRM AND SAY THAT:

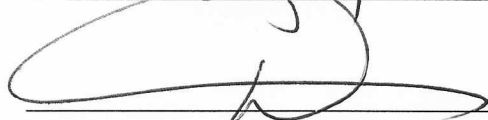
1. I am a purchaser of the Unit, as defined below and as such, I have personal knowledge of the facts deposed to herein, except where stated to be upon information and belief, in which case I believe the same to be true.
2. I have sworn a previous affidavit in these proceedings. My first affidavit was sworn on November 23, 2020 (the "Affidavit of Mounir Alein") in support of my application for a declaration that the condominium project is subject to a resulting or constructive trust in favor of the Purchasers for payment of the deposit funds which are or should have been held in trust to purchasers.
3. On or about December 12, 2015, I entered into a purchase purchase contract with Ceana Developement Sunridge Inc. ("Ceana") for the purchase of a commercial condominium unit (the "Unit") located at 2255-32 Street N.E. Calgary, Alberta, (the "PSA") , copies of which have been attached to my previous Affidavit dated November 23, 2020 and marked as Exhibit "A" and "B" (H7), are copies of the PSA's. The PSA's states that all funds paid to the Vendor "shall be held in trust by the Vendor's solicitor."
4. I have failed to have my rights to the balance of purchaser deposits to be recognized in trust or implied trust pursuant to Memorandum of decision of Honourable Madam Justice K. M. Eidsvik passed on 5th day of February 2021.
5. Through the proceeding of this Court Action Number 1801-04745, it has come to my knowledge that the funds were not used for the intended purpose. Evidence is that they were moved out to related parties or used for other purposes.. The facts of funds being moved out of Ceana Development Sunridge Inc. accounts and into related parties is shown in receiver's Third Report (para 43 (sources and uses schedule & appendix "F" dated December 09,2020))
6. It has come to my attention the "Unit CRU2" for which I had signed PSA dated December 12, 2015, Exhibit "A" of my first affidavit dated November 23, 2020. My second PSA dated 16 August 2018 ("CRU 3") has been sold to another party. This appears to me to be a fraudulent transaction, where one piece of property is sold to 2 different parties and deposits from both are collected. Funds are purposely co-mingled with the understanding of privacy to information under corporate veil of other related companies with the intention to hide the traceability into related parties or their Bank accounts by management of Ceana Development Sunridge Inc, with the knowledge of the accountant Ms. Simeen Gaidhar-Bhanji (which happens to be the daughter of Bahadur (Bob) Gaidhar (director of Ceana Development Sunridge Inc.)
7. My family has been negatively affected by the misappropriation of funds by Mr. Gaidhar and his family through the Ceana project. There is not a moment that passes, where I am not thinking of the financial loss caused to me. I am constantly thinking of how I will repay the borrowed money, I had used to support the Ceana project. At the current pace, it would take more than what ever is left in my lifetime to overcome these financial losses. Everyone deserves to know the truth behind the missing funds and urge the court to initiate an investigation.

8. Through this affidavit I fully support Mr. Sukhdeep Dhaliwal's application for access to information and request the court order an investigation into Ceana and its management's misconduct.

SWORN (or affirmed) BEFORE ME

on April 20, 2021

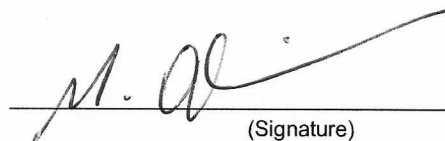
at Calgary, Alberta



(Commissioner for Oaths in and for the Province of Alberta)

DARRELL S. COHEN  
BARRISTER & SOLICITOR

(Print Name and Expiry of Lawyer/Student-at-Law/  
Commissioner or JP)



(Signature)

MOUWIR ALEIN

(Print Name)