



This is the 10th Affidavit of Linda Alexander
in this case and was made on November 24, 2022

NO. S-198522
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF
SECTION 179.1 OF THE *SECURITIES ACT*, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI "DEBBIE" WONG
SIU KON "BONNIE" SOO
ORIGIN BUSINESS PARK INC., formerly known as
WHEATLAND INDUSTRIAL PARK INC.
1300302 ALBERTA INC.
D & E ARCTIC INVESTMENTS INC.
WAI HUNG WONG, ALSO KNOWN AS GILBERT WAI HUNG WONG
CHEN LIANG TAO AND JAE WAN CHOW
NGAI FUNG CHOW AND SAU LAN CHOW
DANNY CHOW, EXECUTOR OF THE WILL OF NGAI MO CHOW,
DECEASED
BRIAN BOTTEM, MARIA BOTTEM, IAN RICHARDSON

RESPONDENTS

AFFIDAVIT

I, Linda Alexander, Paralegal, of 1600-925 West Georgia Street, in the City of Vancouver, in the Province of British Columbia, SWEAR THAT:

1. I am a Paralegal with the law firm of Lawson Lundell LLP, solicitors for the Applicant, MNP Ltd. in its capacity as court-appointed receiver (the "Receiver"), and as such have

personal knowledge of the matters herein deposed to, except where stated to be based on information and belief, in which case I verily believe them to be true.


2. On April 21, 2022, the Receiver sought and was granted an Order approving the sale of another property being the subject of the Receivership, located at 26678 100 Avenue, Maple Ridge, B.C. (the “**100 Avenue Lands**”).
3. At that application, the Receiver also sought and was granted an Order to add the third-party owners and occupants of the 100 Avenue Lands as Respondents to the proceeding, as they were necessary and proper parties to be added in order to facilitate the transfer of title of the 100 Avenue Lands. As a result, the following individuals were added as Respondents to the proceeding by order of the Court pronounced on April 21, 2022: Chen Liang Tao, Jae Wan Chow, Ngai Fung Chow, Sau Lan Chow, and Danny Chow, as Executor of the Will of Ngai Mo Chow, Deceased, Brian Bottem, Maria Bottem, and Ian Richardson (collectively, the “**100 Avenue Owners and Occupants**”). A copy of the Order adding the 100 Avenue Owners and Occupants is attached hereto as **Exhibit “A”**.
4. It was the intention of the Receiver to discontinue this proceeding as against the 100 Avenue Owners and Occupants upon completion of the sale of the 100 Avenue Lands. The sale of the 100 Avenue Lands was completed on May 24, 2022 and, accordingly, the 100 Avenue Owners and Occupants no longer have an interest in this proceeding. Accordingly, the Receiver is seeking an Order to remove the 100 Avenue Owners and Occupants as named Respondents to the proceeding.
5. Farm Credit Canada and Derek Wai Git Wong are each holders of charges against title to the Lands that will be discharged from title to Lands through the proposed sale, as follows:


Nature of Charge	Registration No.	Registered Owner
Right of First Refusal	CA3171252	Derek Wai Git Wong, as to the interest of Debbie
Judgment	CA6365587, renewed by CA7639427 and CA9183886	Farm Credit Canada, as to the interest of Debbie

6. Farm Credit Canada and Derek Wai Git Wong are not currently parties to the proceeding. Accordingly, for the limited purpose of being able to effect transfer of title to the Lands, and release the above-noted charges from title to the Lands, the Receiver is seeking an Order to add Farm Credit Canada and Derek Wai Git Wong as a Respondents to the proceeding, as they are necessary and proper parties to the proceeding. Attached hereto and marked as **Exhibit “B”** is a copy of the title search print for the Lands, confirming the ownership and of the Lands and the charges noted in the preceding paragraph.

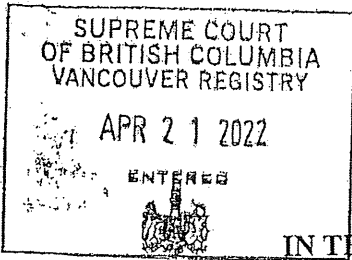
- 7. On November 14, 2022, the Receiver applied to remove the lapsed judgment registered in favour of The Crown in Right of Canada on July 20, 2015, due to effluxion of time. The pending release is noted on the title search print attached hereto as Exhibit B.
- 8. Attached hereto as **Exhibit "C"** is a copy of an Appraisal of the Lands, dated as at October 14, 2022, prepared by Grover Elliott & Co. Ltd., which values the Lands at \$4,580,000.
- 9. Attached hereto as **Exhibit "D"** is a copy of a Market Valuation of the Lands, dated as at May 5, 2022, prepared by Avison Young, which values the Lands at \$6,750,000.

SWORN BEFORE ME at the City of Vancouver)
 in the Province of British Columbia, this 24th)
 day of November, 2022.)


 _____)
 A Commissioner for taking Affidavits for British)
 Columbia.)


 _____)
 LINDA ALEXANDER)

JOEL J. R. SCHACHTER
Barrister & Solicitor
 1600 - 925 WEST GEORGIA ST.
 VANCOUVER, B.C. V6C 3L2
 (604) 685-3456



NO. S-198522
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

IN THE MATTER OF
SECTION 179.1 OF THE *SECURITIES ACT*, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI "DEBBIE" WONG
 SIU KON "BONNIE" SOO
 ORIGIN BUSINESS PARK INC., formerly known as
 WHEATLAND INDUSTRIAL PARK INC.
 1300302 ALBERTA INC.
 D & E ARCTIC INVESTMENTS INC.
 GILBERT WAI HUNG WONG, KWOK KIE SOO
 HILTON WING CHONG SUE, BECKY TING CHANG LUK
 SANDY WEE CHYIU MAR, RITCHIE ROY SUE
 0765311 B.C. LTD., 0760251 B.C. LTD.
 0765994 B.C. LTD., 0765316 B.C. LTD.
 ROBERT FITZ-JAMES, SANDRA VAN DER LAAN
 GARRETT VAN DER LAAN, ALSO KNOWN AS
 GERRIT VAN DER LAAN

This is Exhibit "A" referred to in the
 affidavit of ... LINDA ALEXANDER ...
 made before me on Nov 21 2022

[Signature]
 A Commissioner for taking Affidavits
 for British Columbia

RESPONDENTS

ORDER MADE AFTER APPLICATION
TO ADD RESPONDENT TO THE PROCEEDING

BEFORE THE HONOURABLE) THURSDAY, THE 21ST DAY
)
) DAY OF APRIL, 2022
)


THE APPLICATION of MNP Ltd., in its capacity as Court-appointed Receiver (the "Receiver") of the assets, undertakings and properties of the Respondents Siu Mui "Debbie" Wong, Siu Kon "Bonnie" Soo, Origin Business Park Inc., formerly known as Wheatland Industrial Park Inc., 1300302 Alberta Inc. and D & E Arctic Investments Inc. (collectively, the "Debtors"), coming on for hearing, via *Microsoft Teams*, at Vancouver, British Columbia, on the 21st day of April, 2022; AND ON HEARING Joel Schachter, counsel for the Receiver and no one appearing for the Petitioner, the Respondents or the Intended Respondents, although duly served, AND UPON READING the

material filed, including the Affidavit of the Patty Wood sworn herein on March 25, 2022 (the "Receiver's Affidavit");

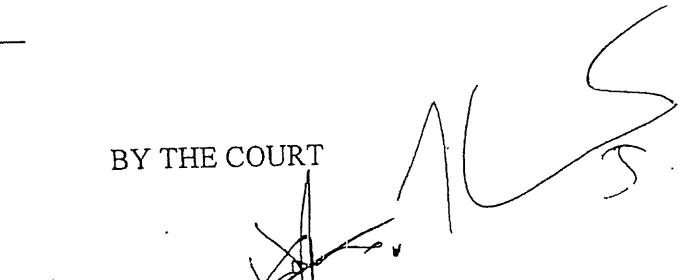
THIS COURT ORDERS that:


1. Kwok Kie Soo, Hilton Wing Chong Sue, Becky Ting Chang Luk, Sandy Wee Chyiu Mar, Ritchie Roy Sue, 0765311 B.C. Ltd., 0760251 B.C. Ltd., 0765994 B.C. Ltd., 0765316 B.C. Ltd., Robert Fitz-James, Sandra van der Laan and Garrett van der Laan, also known as Gerrit van der Laan be removed as named Respondents to this proceeding;
2. The name of the Respondent Gilbert Wai Hung Wong ("Mr. Wong") be amended to read "Wai Hung Wong, also known as Gilbert Wai Hung Wong" for the purposes of this proceeding;
3. Chen Liang Tao, Jae Wan Chow, Ngai Fung Chow, Sau Lan Chow, and Danny Chow, as Executor of the Will of Ngai Mo Chow, Deceased, Brian Bottem, Maria Bottem, and Ian Richardson be added as named Respondents to these proceedings, *nunc pro tunc*.
4. The style of proceedings be and is hereby amended accordingly.
5. Preparation and service of the Amended Petition on all parties be and is hereby dispensed with.
6. The terms of Rule 6-2(8) of the Supreme Court Civil Rules be dispensed with.
7. The Receiver shall be entitled to its costs of this application.

THE FOLLOWING PARTIES APPROVE THE FORM OF THIS ORDER AND CONSENT TO EACH OF THE ORDERS, IF ANY, THAT ARE INDICATED ABOVE AS BEING BY CONSENT:



 Joel Schachter
 COUNSEL FOR THE APPLICANT

BY THE COURT


 REGISTRAR


TITLE SEARCH PRINT

File Reference: 22556-148347
Declared Value \$979750

2022-11-24, 13:59:39
Requestor: Linda Alexander


****CURRENT INFORMATION ONLY - NO CANCELLED INFORMATION SHOWN****

Land Title District NEW WESTMINSTER
Land Title Office NEW WESTMINSTER

Title Number CB278062
From Title Number BB1509955

Application Received 2022-10-12

Application Entered 2022-10-26

This is Exhibit " B " referred to in the
affidavit of LINDA ALEXANDER
made before me on Nov 24 2022

A Commissioner for taking Affidavits
for British Columbia

Registered Owner in Fee Simple
Registered Owner/Mailing Address: DEBBIE SIU MUI WONG, BUSINESSWOMAN
16863 - 58A AVENUE
SURREY, BC
V3S 8P1
AS TO AN UNDIVIDED 1/4 INTEREST

Registered Owner/Mailing Address: NGAI WOON CHOW, BUSINESSMAN
13275 - 59A AVENUE
SURREY, BC
V3X 3P8
AS TO AN UNDIVIDED 1/2 INTEREST

Registered Owner/Mailing Address: DEREK WONG
AUSTIN WONG
16863 58A AVENUE
SURREY, BC
V3S 8P1
EXECUTORS OF THE WILL OF GILBERT WAI HUNG WONG,
DECEASED, SEE CB278062
AS TO AN UNDIVIDED 1/4 INTEREST

Taxation Authority Surrey, City of

Description of Land
Parcel Identifier: 000-616-583
Legal Description:
LOT A EXCEPT: PART ON STATUTORY RIGHT OF WAY PLAN 83439, SECTION 18
TOWNSHIP 2 NEW WESTMINSTER DISTRICT PLAN 10691

Legal Notations NONE

TITLE SEARCH PRINT

File Reference: 22556-148347

Declared Value \$979750

2022-11-24, 13:59:39

Requestor: Linda Alexander

Charges, Liens and Interests

Nature: EASEMENT
 Registration Number: M59912
 Registration Date and Time: 1976-05-26 14:46
 Remarks: APPURTENANT TO M45451 (SEE M45451)

Nature: EASEMENT
 Registration Number: M59913
 Registration Date and Time: 1976-05-26 14:46
 Remarks: PORTION APPURTENANT TO M45451 (SEE M45451)

Nature: MORTGAGE
 Registration Number: CA2951150
 Registration Date and Time: 2013-01-14 14:54
 Registered Owner: SOUTH TOWN ENTERPRISES LTD.
 INCORPORATION NO. BC0459773
 Transfer Number: CA4676188

Nature: ASSIGNMENT OF RENTS
 Registration Number: CA2951151
 Registration Date and Time: 2013-01-14 14:54
 Registered Owner: SOUTH TOWN ENTERPRISES LTD.
 INCORPORATION NO. BC0459773
 Transfer Number: CA4676189

Nature: MORTGAGE
 Registration Number: CA3171250
 Registration Date and Time: 2013-06-10 16:29
 Registered Owner: NGAI WOON CHOW
 KWAN CHYIU CHOW
 AS JOINT TENANTS
 Remarks: AS TO THE UNDIVIDED 1/4 INTEREST OF
 DEBBIE SIU MUI WONG

Nature: MORTGAGE
 Registration Number: CA3171251
 Registration Date and Time: 2013-06-10 16:29
 Registered Owner: DEREK WONG
 AUSTIN WONG
 EXECUTORS OF THE WILL OF GILBERT WAI HUNG WONG,
 DECEASED, SEE CB278063
 Transfer Number: CB278063
 Remarks: AS TO THE UNDIVIDED 1/4 INTEREST OF
 DEBBIE SIU MUI WONG

TITLE SEARCH PRINT

File Reference: 22556-148347

Declared Value \$979750

2022-11-24, 13:59:39

Requestor: Linda Alexander

Nature: RIGHT OF FIRST REFUSAL
 Registration Number: CA3171252
 Registration Date and Time: 2013-06-10 16:29
 Registered Owner: DEREK WAI GIT WONG
 Remarks: AS TO THE UNDIVIDED 1/4 INTEREST OF
 DEBBIE SIU MUI WONG

Nature: SECURITIES ACT CHARGE
 Registration Number: BB3013226
 Registration Date and Time: 2013-09-27 14:58
 Registered Owner: BRITISH COLUMBIA SECURITIES COMMISSION
 Remarks: SECTION 151, RESTRICTS DEALINGS

Nature: JUDGMENT
 Registration Number: CA4545125
 Registration Date and Time: 2015-07-20 08:46
 Registered Owner: THE CROWN IN RIGHT OF CANADA
 Remarks: AS TO THE INTEREST OF DEBBIE SIU MUI WONG

Nature: JUDGMENT
 Registration Number: CA6365587
 Registration Date and Time: 2017-10-12 11:40
 Registered Owner: FARM CREDIT CANADA
 Remarks: AS TO THE INTEREST OF DEBBIE SIU MUI WONG
 RENEWED BY CA7639427

Nature: JUDGMENT
 Registration Number: CA6591432
 Registration Date and Time: 2018-01-26 14:00
 Registered Owner: BRITISH COLUMBIA SECURITIES COMMISSION
 Remarks: AS TO THE INTEREST OF DEBBIE SIU MUI WONG
 RENEWED BY CA7978405

Nature: JUDGMENT
 Registration Number: CA7639427
 Registration Date and Time: 2019-07-24 08:34
 Registered Owner: FARM CREDIT CANADA
 Remarks: RENEWAL OF CA6365587
 AS TO THE INTEREST OF DEBBIE SIU MUI WONG
 RENEWED BY CA9183886

TITLE SEARCH PRINT

File Reference: 22556-148347

Declared Value \$979750

2022-11-24, 13:59:39

Requestor: Linda Alexander

Nature: JUDGMENT
 Registration Number: CA7837829
 Registration Date and Time: 2019-10-30 09:08
 Registered Owner: HER MAJESTY THE QUEEN IN RIGHT OF CANADA
 Remarks: AS TO THE INTEREST OF GILBERT WAI HUNG WONG
 RENEWED BY CA9397597

Nature: INJUNCTION
 Registration Number: CA7859608
 Registration Date and Time: 2019-11-08 09:16
 Remarks: RESTRICTS DEALINGS

Nature: JUDGMENT
 Registration Number: CA7978405
 Registration Date and Time: 2020-01-14 11:41
 Registered Owner: BRITISH COLUMBIA SECURITIES COMMISSION
 Remarks: AS TO THE INTEREST OF DEBBIE SIU MUI WONG
 RENEWAL OF CA6591432
 RENEWED BY CA9564132

Nature: JUDGMENT
 Registration Number: CA9183886
 Registration Date and Time: 2021-07-13 11:11
 Registered Owner: FARM CREDIT CANADA
 Remarks: AS TO THE INTEREST OF DEBBIE SIU MUI WONG
 RENEWAL OF CA7639427

Nature: JUDGMENT
 Registration Number: CA9397597
 Registration Date and Time: 2021-09-29 12:14
 Registered Owner: HER MAJESTY THE QUEEN IN RIGHT OF CANADA
 Remarks: RENEWAL OF CA7837829
 AS TO THE INTEREST OF GILBERT WAI HUNG WONG

Nature: JUDGMENT
 Registration Number: CA9564132
 Registration Date and Time: 2021-12-08 09:06
 Registered Owner: BRITISH COLUMBIA SECURITIES COMMISSION
 Remarks: AS TO THE INTEREST OF DEBBIE SIU MUI WONG
 RENEWAL OF CA7978405

Duplicate Infeasible Title

NONE OUTSTANDING

Transfers

NONE

TITLE SEARCH PRINT

File Reference: 22556-148347

Declared Value \$979750

2022-11-24, 13:59:39

Requestor: Linda Alexander

Pending Applications

Parcel Identifier:

000-616-583

Application Number/Type:

CB333556 CHARGE RELEASE