

This is the 2<sup>nd</sup> Affidavit of Patty Wood in this case and was made on July 29, 2021

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.

RESPONDENTS

#### **AFFIDAVIT**

I, PATTY WOOD, CPA, CGA, LIT, CIRP, of #2200 – 1021 West Hastings Street, in the City of Vancouver, in the Province of British Columbia, MAKE OATH AND SAY AS FOLLOWS:

1. I am a Senior Vice President with MNP Ltd., the receiver (the **Receiver**) of the assets and undertakings and property of 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**), and as such am authorized by the Receiver to make this Affidavit. I have personal knowledge of the facts and matters hereinafter deposed to, save and except where the same are stated to be made upon information and belief, and, as to such facts, I verily believe the same to be true.

# **Overview**

- 1. On October 3, 2019, the British Columbia Securities Commission sought and obtained an order in this proceeding appointing the Receiver. The Receiver was appointed to assist with the orderly recovery and distribution of funds to investors who were defrauded by the Debtors. The liability and sanctions decisions are available on CanLII at *Re Wong*, 2016 BCSECCOM 208 (Liability Decision) and *Re Wong*, 2017 BCSECCOM 57 (Sanctions Decision).
- 2. The Receiver has brought the within application to amend the Receivership Order.
- 3. I have read the Affidavit #1 of Catherine Palmer filed herein on July 31, 2019, and verily believe it to be true.

# Proposed Amendments to the Receivership Order

Amend the Definition of Property in the Receivership Order

- 4. Prior to the Receivership, the Commission completed a detailed investigation to locate the property owned by the Debtors. The assets listed in Schedule "B" of the Receivership Order were based on the Commission's examination of various evidence including:
  - a. Affidavit of Siu Mui Wong, filed on February 4, 2015 in Action No. S-149050;
  - b. Affidavit of Siu Mui Wong, filed on January 7, 2016 in Action No. S-149050; and
  - c. Affidavit of Siu Kon Soo, filed on February 4, 2015 in Action No. S-149050.

(collectively, the Asset Affidavits).

The Asset Affidavits are attached to the Affidavit #1 of Catherine Palmer filed herein on July 31, 2019, as Exhibits O, P, and Q, respectively.

5. Certain assets listed in the Asset Affidavits were inadvertently not included in Schedule "B" of the Receivership Order. Additionally, the bank accounts listed in the Asset Affidavits were not cross-referenced with the bank accounts subject to the Order to Freeze Property issued by the Commission on September 26, 2013 and the Order to Freeze Property issued by the Commission on February 3, 2017 (collectively, the **Freeze Orders**). The Freeze Orders are attached hereto collectively as **Exhibit "A"** (Exhibit Page 1).

6. After reviewing the Receivership Order, the Asset Affidavits and the Freeze Orders, I concluded that the definition of Property in the Receivership Order needs to be expanded to include the following accounts:

Financial Institution	Branch Address	Account Number	Account Holders
G&F Financial Group 500 – 6456 176 <sup>th</sup> Street, Su British Columbia		100010410506	Siu Mui Wong
Royal Bank of Canada	Unknown	26686955	Bonnie Soo
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120 5046834	Debbie Wong
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120 5462015	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 0754786	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 4502514	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 5056197	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 5060371	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 7024581	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 7003908	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 8500001	Bonnie Soo
Royal Bank of Canada	611 - 650 West 41st Avenue, Vancouver, BC	07360 5127162	Debbie Wong
HSBC Canada	681 Main Street, Vancouver, BC	080 148271-150	Debbie Wong
HSBC Canada	681 Main Street, Vancouver, BC	080 061990-150	Debbie Wong
HSBC Canada	681 Main Street, Vancouver, BC	080 061990-203	Debbie Wong
HSBC Canada 681 Main Street, Vancouver,		320-891178-001	1300302 Alberta Inc.
HSBC Canada	681 Main Street, Vancouver, BC	320-891178-002	1300302 Alberta Inc.
Toronto Dominion Bank	2100 – 3779 Sexsmith Road, Richmond, BC V6X 3Z9	9713 6375420	Debbie Wong

7. I also discovered the following typographical errors in Schedule B to the Receivership Order:

Royal Bank of Canada	400 Main Street, Vancouver, BC	07120 5526969 07120 5526959	Debbie Wong
Royal Bank of Canada	400 Main St, Vancouver, BC 17931 56th Avenue, Surrey, BC	01110 7003908	Bonnie Soo
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120-55226959 07120 <u>5526959</u>	Bonnie Soo
Royal Bank of Canada Toronto Dominion Bank	900 West King Edward Avenue, Vancouver, BC	9466 6326743	Bonnie Soo

8. The Receiver seeks to amend the Receivership Order by replacing the existing Schedule "B" with the Receiver's proposed revised Schedule "B", which reflects the changes noted in the two preceding paragraphs. The Receiver's proposed replacement Schedule "B" is attached hereto as **Exhibit** "B" (Exhibit Page 6).

# Include the Receiver's Website and Demand for Notice

- 9. The Receiver seeks to amend the Receivership Order at Paragraph 29 by deleting the words [WEB ADDRESS], and adding the Receiver's website in respect of these proceedings, being <a href="https://mnpdebt.ca/en/corporate/corporate-engagements/siu-mui-debbie-wong-siu-kon-bonnie-soo-origin-business-park-inc.">https://mnpdebt.ca/en/corporate/corporate-engagements/siu-mui-debbie-wong-siu-kon-bonnie-soo-origin-business-park-inc.</a>.
- 10. The Model Receivership Order includes a standard form demand notice (the **Demand for Notice**) that any individuals, firms, corporations, governmental bodies or agencies, or other entities person who are served with a copy of a receivership order can complete and send to the Receiver to ensure that the individual or entity receives notice of any subsequent applications.
- 11. The Receivership Order includes a reference in Paragraph 30 to the Demand for Notice being attached as Schedule B. However, due to inadvertence, the Demand for Notice was not attached as a schedule to the Receivership Order.
- 12. Accordingly, the Receiver seeks to amend the Receivership Order by:
  - a. adding the Receiver's Demand for Notice as Schedule D; and
  - b. deleting the words "Schedule 'B" in paragraph 30 of the Receivership Order, and replacing the aforesaid deleted words with "Schedule 'D".
- 13. The Receiver's proposed Demand for Notice is attached as **Exhibit** "C" (Exhibit Page 11).

## Proposed Conduct of Sale of the Remaining Real Properties

- 14. The Receivership Order provides, *inter alia*, that the Receiver is authorized to market the following real properties for sale, to solicit offers in respect of those assets and to negotiate such terms and conditions of sale as deemed appropriate, with any eventual sale being subject to Court approval:
  - a. 16863 58A Ave, Surrey, B.C.
    PID: 018-997-554
    Lot 4 Section 7 Township 8 NWD Plan LMP19441
    (the "58A Avenue Lands")

b. 25141 Dewdney Trunk Rd, Maple Ridge
PID: 011-016-272
Lot 3 Section 23 Township 12 NWD Plan 4023
(the "Dewdney Trunk Lands")

c. 26678 100 Ave, Maple Ridge, B.C.
PID: 006-983-391
East Half Lot 13 Section 6 Township 15 NWD Plan 2721 (the "100 Avenue Lands")

d. 7192 – 120 St, Surrey, B.C. (also described as 12008 72 Ave, Surrey, BC) PID: 000-616-583
 Lot A Except: Part on Statutory Right of Way Plan 83439, Section 18 Township 2 NWD Plan 10691 (the "120 Street Lands")

- 15. The Receiver arranged a sale of Siu Mui Wong's one-half interest in the 58A Avenue Lands, which sale has been approved by court order on June 15, 2021, and completed on June 30, 2021.
- 16. The Receiver will also need to take steps to market and sell the remaining properties, being the Dewdney Trunk Lands, the 100 Avenue Lands and the 120 Street Lands. The Receivership Order only permits the Receiver to sell the Debtors' proportional interest in the Lands, which is not feasible for the remaining three properties due to the large number of owners. The Dewdney Trunk Lands, the 100 Avenue Lands and the 120 Street Lands have 9, 4 and 3 registered owners, respectively.
- 17. A copy of the title search print of the Dewdney Trunk Lands is attached as **Exhibit "D"** (Exhibit Page 13).
- 18. A copy of the title search print for the 100 Avenue Land is attached as **Exhibit "E"** (Exhibit Page 18).
- 19. A copy of the title search print for 120 Street Lands is attached as **Exhibit "F"** (Exhibit Page 22).
- 20. As a result, the Receiver seeks an order to further amend the Receivership Order, by amending paragraphs 3(k), 3(l) and 3(m) as follows:
  - (k) market any or all of the Property, or any and all of the real properties listed on Schedule "B", in their entirety, including the interest of the debtor and any other registered owner or owners (the "Real Properties"), including advertising and soliciting offers in respect of the Property or any part or parts thereof and negotiating such terms and conditions of sale as the Receiver considers appropriate;

- (l) sell, convey, transfer, lease, assign or otherwise dispose of the Property, <u>including the entirety of the Real Properties</u>, or any part or parts thereof out of the ordinary course of business:
  - a. without the approval of this Court in respect of any transaction not exceeding \$20,000.00, provided that the aggregate consideration for all such transactions does not exceed \$100,000.00; and
  - b. with the approval of this Court in respect of any transaction in which the purchase price or the aggregate purchase price exceeds the applicable amounts set out in the preceding clause,

and in each such case notice under Section 59(10) of the Personal Property Security Act, R.S.B.C. 1996, c. 359 shall not be required;

(m) apply for any vesting order or other orders necessary to convey the Property, including the entirety of the Real Properties, or any part or parts thereof to a purchaser or purchasers thereof, free and clear of any liens or encumbrances affecting such Property.

PATTY

SWORN BEFORE ME at the City of Vancouver, ) in the Province of British Columbia, this <u>29</u> day ) of July, 2021

A Commissioner for taking Affidavits within

British Columbia

GREG IBBOTT

A commissioner for taking Affidavits
for the Province of British Columbia

Expire January 31,2022

1

This is **Exhibit** "A" referred to in the Affidavit of Patty Wood made before me on July \_\_\_\_\_\_, 2021.

A COMMISSIONER FOR TAKING AFFIDAVITS FOR BRITISH COLUMBIA



#### **British Columbia Securities Commission**

COR #13/154

CERTIFIED A TRUE COPY
OF ORIGINAL

POUDL

Executive Assistant to the Chair
Date: 2013-9-26

#### **Order to Freeze Property**

Siu Mui "Debbie" Wong, Siu Kon "Bonnie" Soo, Wheatland Industrial Park Inc., 1300302 Alberta Inc., and D & E Arctic Investments Inc.

(collectively, the Respondents)

Section 151 of the Securities Act, RSBC 1996, c. 418

#### Background

- 1. A Notice of Hearing was issued on May 22, 2013 naming Wheatland Industrial Park Inc., Siu Mui "Debbie" Wong and Siu Kon "Bonnie" Soo alleging illegal distribution and fraud with respect to the Wheatland property development (the Wheatland Notice of Hearing).
- 2. Commission staff obtained an Investigation Order under section 142 of the Act on June 28, 2013 in respect of Siu Mui Wong, Siu Kon Soo, D & E Arctic Investments Inc., and 1300302 Alberta Inc.(COR#2013/113) with respect to conduct contrary to the public interest or in contravention of the Act on a property known as Rocky View (the Rocky View Investigation).
- 3. The Wheatland Notice of Hearing was amended on September 25, 2013 to add allegations of fraud and illegal distribution with respect to the Rocky View Investigation and an additional allegation of fraud with respect to the Wheatland property.

#### The Order

4. The Commission, considering it to be in the public interest to do so, orders under section 151(2) of the Act that:

The bank listed in column 2 in the chart below, hold any funds, securities, exchange contracts or other property that it may have on deposit, under control or for safekeeping in the name of the person or corporation identified in column 1, in the branch identified in column 3, in the account number identified in column 4.



(1) Name of Account Holder	(2) Bank	(3) Branch	(4) Account number
Mrs. Debbie Siu Mui Wong	RBC	01110	0754786
Mrs. Debbie Siu Mui Wong	RBC	01110	4502514
Mrs. Debbie Siu Mui Wong	RBC	01110	5056197
Mrs. Debbie Siu Mui Wong	RBC	01110	5060371
Mrs. Debbie Siu Mui Wong	RBC	01110	7003908
Mrs. Debbie Siu Mui Wong	RBC	01110	7024581
Mrs. Debbie Siu Mui Wong	RBC	07120	5000914
Mrs. Debbie Siu Mui Wong	RBC	07120	5046834
Mrs. Debbie Siu Mui Wong	RBC	07120	5462015
Mrs. Debbie Siu Mui Wong	RBC	07120	5522321
Mrs. Debbie Siu Mui Wong	RBC	07120	5522339
Mrs. Debbie Siu Mui Wong	RBC	01720	5526959
Mrs. Debbie Siu Mui Wong	RBC	07360	5127162
Bonnie Siu Kon Soo	RBC	01110	5001185
Bonnie Siu Kon Soo	RBC	01110	7003908
Bonnie Siu Kon Soo	RBC	01110	8500001
Bonnie Siu Kon Soo	RBC	02880	5164348
Bonnie Siu Kon Soo	RBC	06800	5266051
Bonnie Siu Kon Soo	RBC	07120	5039938
Bonnie Siu Kon Soo	RBC	07120	5522339
Bonnie Siu Kon Soo	RBC	07120	5524988
Bonnie Siu Kon Soo	RBC	07120	5526959
Bonnie Siu Kon Soo	RBC	None	26686955
Ms. Siu Mui Wong	HSBC	080	148271-150
Ms. Siu Mui Wong	HSBC	080	061990-150
Ms. Siu Mui Wong	HSBC	080	061990-203
Ms. Siu Mui Wong	HSBC	None	5079744
Ms. Siu Mui Wong	HSBC	None	6YD6Y9S
1300302 Alberta Inc.	HSBC	320	891178-001
1300302 Alberta Inc.	HSBC	320	891178-002
Ms. Debbie Siu Mui Wong	TD Bank	9713	6375420
Ms. Siu Kon Soo	TD Bank	9466	6326743
Ms. Siu Kon Soo	TD Bank	9466	6332522
Siu Mui (Debbie) Wong	CIBC	00720	7588836

<sup>&</sup>quot;RBC" refers to the Royal Bank of Canada "HSBC" refers to HSBC Bank of Canada

<sup>&</sup>quot;TD Bank" refers to TD Bank Financial Group



5. The Respondents refrain from withdrawing any funds, securities, exchange contracts or other property described in this Order.

September 26, 2013

Don Rowlatt Commissioner



#### **British Columbia Securities Commission**

Executive Assistant to the Chair

COR #2017/12

# **Order to Freeze Property**

Siu Mui "Debbie" Wong, Siu Kon "Bonnie" Soo, Wheatland Industrial Park Inc., 1300302 Alberta Inc., and D&E Arctic Investments Inc. (the Respondents)

Section 151 of the Securities Act, RSBC 1996, c. 418

# **Background**

- ¶ 1 The British Columbia Securities Commission (the Commission) ordered an investigation of the Respondents, under section 142 of the Securities Act (the Act), on October 2, 2013.
- ¶ 2 On September 25, 2013, an Amended Notice of Hearing was issued against the Respondents (2013 BCSECCOM 404), and on January 26, 2015, a Further Amended Notice of Hearing was issued against the Respondents (2015 BCSECCOM 36).
- ¶ 3 On June 16, 2016, a commission panel found Wong perpetrated fraud and engaged in illegal securities distributions (2016 BCSECCOM 208). The decision on sanction is outstanding.

#### The Order

- ¶ 4 The Commission, considering it to be in the public interest to do so, orders under section 151(2) of the Act that:
  - G&F Financial Group hold any funds, securities, exchange contracts, or other property that is on deposit, under control or for safekeeping in Account No. 100010410506 in the name of Siu Mui Wong, membership number 120355, held at the G&F Financial Group Cloverdale branch, located at 500 - 6456, 176<sup>th</sup> Street, Surrey, British Columbia (the Account); and
  - 2. the Respondents refrain from withdrawing any funds, securities, exchange contracts, or other property in the Account described in this Order.

February 3, 2017

Brenda M. Leong

Chair

This is **Exhibit "B"** referred to in the Affidavit of Patty Wood made before me on July 2921.

A COMMISSIONER FOR TAKING AFFIDAVITS FOR BRITISH COLUMBIA

# **SCHEDULE "B"**

# REAL PROPERTY

Civic address	Legal description	Registered owners
25141 Dewdney Trunk Rd, Maple	PID: 011-016-272	Debbie Wong and Gilbert Wong (2/16
Ridge	Lot 3 Section 23 Township 12 NWD Plan 4023	as joint tenants) Bonnie Soo and Kwok Kie Soo (2/16 as joint tenants) Hilton Wing Chong Sue and Becky Ting Chang Luk (2/16 as joint tenants) Sandy Wee Chyiu Mar (1/16) Ritchie Roy Sue (1/16) 0765311 B.C. Ltd. (2/16) 0765994 B.C. Ltd. (2/16) 0765316 B.C. Ltd. (2/16)
7192 – 120 St, Surrey, B.C. (also described as 12008 72 Ave, Surrey, BC)	PID: 000-616-583 Lot A Except: Part on Statutory Right Of Way Plan 83439, Section 18 Township 2 NWD Plan 10691	Debbie Wong and (1/4) Gilbert Wong (1/4) Ngai Woon Chow (1/2)
26678 100 Ave, Maple Ridge, B.C.	PID: 006-983-391 East Half Lot 13 Section 6 Township 15 NWD Plan 2721	Debbie Wong and Wai Hung Wong (1/4 as joint tenants) Chen Liang Tao and Jae Wan Chow (1/4 as joint tenants) Danny Chow, Executor of Will of Ngai Mo Chow, Deceased (1/4) Ngai Fung Chow and Sau Lan Chow (1/4 as joint tenants)
16863 58A Ave, Surrey, B.C.	PID: 018-997-554 Lot 4 Section 7 Township 8 NWD Plan LMP19441	Debbie Wong and Siu Mui Wong (as joint tenants)
Proceeds of sale (\$204,015) held in trust by Owen Bird LLP, Vancouver, BC for: 33136 Dewdney Trunk Road, Mission	PID: 011-946-288 Lot 1 Except Parcel A (Reference Plan 10352) Section 33 Township 17 New Westminster District Plan 1072	Debbie Wong (1/4) Bonnie Soo (1/4) Kwok Kie Soo (1/4) Gilberta Wai Hung Wong (1/4)
Proceeds of sale (\$38,543.10) held in trust with Colin Wong Barrister & Solicitor & Notary Public, Edmonton, AB for: 11456 Jasper Avenue, Edmonton, Alberta		1342565 Alberta Inc. (Debbie Wong) (1/2) New City Enterprises (Bonnie Soo) (1/2)
Proceeds from sale (\$27,520) held in trust with conveyance lawyer for: Property located in Alberta		0774238 BC. Ltd. (Bonnie Soo)
Proceeds from sale (\$20,585.40) held in trust with conveyance lawyer for: Property located in Alberta		D&C Atlantic Investments Inc.
Proceeds from sale (\$281,711) paid into Court in 1305402 Alberta Inc. v. 0774238 B.C. Ltd.; A.B.Q.B. Action No. 1801-07295 for the "Rocky View Lands"	Meridian 4 Range 27 Township 23 Section 32 Quarter SW Containing 54.7 hectares (160 acres) More or Less excepting thereout: Hectares (Acres) More or Less A) Plan 9211808 Descriptive 2.64 (6.52) excepting thereout all mines and minerals	

# BANK ACCOUNTS

Financial Institution	Branch Address	Account Number	Account holders
Royal Bank of Canada	400 Main Street,	07120-5000914	Debbie Wong
	Vancouver		
Royal Bank of Canada	400 Main Street,	07120-5522321	Debbie Wong
	Vancouver, B.C.		
Royal Bank of Canada	400 Main Street,	07120-5522339	Debbie Wong
	Vancouver, BC		
Royal Bank of Canada	400 Main Street,	07120-5526959	Debbie Wong
	Vancouver, BC		
HSBC Bank Canada	608 Main Street,	5079744 (RRSP)	Debbie Wong
	Vancouver, BC		
HSBC Bank Canada	608 Main Street,	6Y-D6Y9-S (Invest	Debbie Wong
	Vancouver, BC	Direct RRSP)	
Royal Bank of Canada	400 Main Street,	044944726 (RESP)	Debbie Wong
	Vancouver, BC		
Royal Bank of Canada	400 Main Street,	884758822 (RESP)	Debbie Wong
	Vancouver, BC	, ,	
Vancouver City Savings	Unit H120-15795	14233 (Branch 70 )	Debbie Wong
Credit Union	Croydon Drive, Surrey,		
	BC		
CIBC Account No.	20069 64 Avenue,	00720-7588836	Debbie Wong
	Langley, BC		_
The Toronto-Dominion		91940 004	1342565 Alberta Inc.
Bank		91945246385	
Royal Bank of Canada	400 Main Street,	7120-5524988	Bonnie Soo
	Vancouver, BC		
Royal Bank of Canada	2208 West 41st Avenue,	06800-5266051	Bonnie Soo
	Vancouver, BC		
Vancouver City Savings	100 – 20055	191700 (Branch 23)	Bonnie Soo
Credit Union	Willowbrook Drive,		
	Langley, BC		
Royal Bank of Canada	17931 56th Avenue,	01110 7003908	Bonnie Soo
	Surrey, BC	(USD Personal	
		Account)	
Royal Bank of Canada	400 Main Street,	07120 5522339	Bonnie Soo
	Vancouver, BC		
Royal Bank of Canada	400 Main Street,	07120 5526959	Bonnie Soo
	Vancouver, BC		
Royal Bank of Canada	400 Main Street,	01110 5001185	Bonnie Soo
	Vancouver, BC		
Royal Bank of Canada	400 Main Street,	02880-5164348	Bonnie Soo
	Vancouver, BC		
Royal Bank of Canada	400 Main Street,	07120 5039938	Bonnie Soo
	Vancouver, BC		
The Toronto-Dominion	900 West King	9466 6326743	Bonnie Soo
Bank	Edward, Vancouver,		
	BC		
The Toronto-Dominion	900 West King Edward	9466 6332522	Bonnie Soo
Bank	Avenue, Vancouver,		
	BC		

# 3 of 4

G&F Financial Group	500 – 6456 176 <sup>th</sup> Street, Surrey, B.C.	100010410506	Siu Mui Wong
Royal Bank of Canada	Unknown	26686955	Bonnie Soo
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120 5046834	Debbie Wong
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120 5462015	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 0754786	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 4502514	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 5056197	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 5060371	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 7024581	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 7003908	Debbie Wong
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 8500001	Bonnie Soo
Royal Bank of Canada	611 - 650 West 41st Avenue, Vancouver, BC	07360 5127162	Debbie Wong
HSBC Canada	681 Main Street, Vancouver, BC	080 148271-150	Debbie Wong
HSBC Canada	681 Main Street, Vancouver, BC	080 061990-150	Debbie Wong
HSBC Canada	681 Main Street, Vancouver, BC	080 061990-203	Debbie Wong
HSBC Canada	681 Main Street, Vancouver, BC	320-891178-001	1300302 Alberta Inc.
HSBC Canada	681 Main Street, Vancouver, BC	320-891178-002	1300302 Alberta Inc.
Toronto Dominion Bank	2100 – 3779 Sexsmith Road, Richmond, BC V6X 3Z9	9713 6375420	Debbie Wong

## **SHAREHOLDINGS**

SHAREHOLDINGS	
Corporate Entity	
1342565 Alberta Inc.	Debbie Wong (100%)
D & E Arctic Investments Inc.	Debbie Wong (50%)
D & C Atlantic Investments Inc.	Debbie Wong (50%)
0793751 BC Ltd.	Debbie Wong (100%)
0765306 B.C. Ltd.	Debbie Wong (50%)
1376472 Alberta Ltd.	Debbie Wong (50%)
0879932 B.C. Ltd.	Debbie Wong (50%)
1300302 Alberta Inc. Joint Venture	Bonnie Soo
Wheatland Industrial Park Joint Venture	Debbie Wong and Bonnie Soo
0790333 B.C. Ltd.	Bonnie Soo (100%)
0745188 B.C. Ltd.	Bonnie Soo (50%)
0774238 B.C. Ltd.	Bonnie Soo (50%)
1192657 Alberta Ltd.	Bonnie Soo (50%)
1342558 Alberta Inc.	Bonnie Soo (50%)
New City Enterprises Ltd.	Bonnie Soo (100%)

This is **Exhibit "C"** referred to in the Affidavit of Patty Wood made before me on July 29, 2021.

A COMMISSIONER FOR TAKING AFFIDAVITS FOR BRITISH COLUMBIA

# SCHEDULE "D"

## **Demand for Notice**

TO:		British Columbia Securities Commission c/o Lawson Lundell LLP Attention: William L. Roberts Email: wroberts@lawsonlundell.com		
AND TO:		MNP Ltd. c/o Lawson Lundell LLP Attention: Patty Wood Email: Patty.Wood@mnp.ca		
Re:	Briti Kon	te matter of the Section 152 of the Securities Act, RSBC 1996, C. 418 Between ish Columbia Securities Commission (Petitioner) and Siu "Debbie" Wong, Siu "Bonnie" Soo, Origin Business Park Inc. formerly known as Wheatland astrial Park Inc., 1300302 Alberta Inc., D & E Arctic Investments Inc.		
		est that notice of all further proceedings in the above Receivership be sent to me in manner:		
1.	By em	ail, at the following address (or addresses):		
	OR			
2.	2. By facsimile, at the following facsimile number (or numbers):			
	OR			
3.	By ma	il, at the following address:		
		Name of Creditor:		
		Name of Counsel (if any):		
		Creditor's Contact Address:		

Creditor's Contact Phone Number:

This is **Exhibit "D"** referred to in the Affidavit of Patty Wood made before me on July \_\_\_\_\_\_\_, 2021.

A COMMISSIONER FOR TAKING AFFIDAVITS FOR BRITISH COLUMBIA

2021-07-22, 15:40:24

File Reference: 26420-148347

Declared Value \$ 780000

Requestor: Linda Alexander

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

**Land Title District** 

Land Title Office

NEW WESTMINSTER

**NEW WESTMINSTER** 

**Title Number** 

BA439708

From Title Number

R5816E

**Application Received** 

2006-10-30

**Application Entered** 

2006-11-07

Registered Owner in Fee Simple

Registered Owner/Mailing Address:

GILBERT WAI HUNG WONG, BUSINESSMAN

SIU MUI WONG, BUSINESSPERSON

16863 - 58A AVENUE

SURREY, BC V3S 8P1

AS TO AN UNDIVIDED 2/16 INTEREST AS JOINT TENANTS

Registered Owner/Mailing Address:

KWOK KIE SOO, BUSINESSMAN

SIU KON SOO, BUSINESSPERSON

16273 - 20TH AVENUE

SURREY, BC V4P 2R2

AS TO AN UNDIVIDED 2/16 INTEREST AS JOINT TENANTS

Registered Owner/Mailing Address:

HILTON WING CHONG SUE, SOLICITOR

BECKY TING CHANG LUK, NURSE

3469 TRIUMPH STREET VANCOUVER, BC

V5K 1T9

AS TO AN UNDIVIDED 2/16 INTEREST AS JOINT TENANTS

Registered Owner/Mailing Address:

SANDY WEE CHYIU MAR, NURSE

13399 - 60TH AVENUE

SURREY, BC V3X 2M1

AS TO AN UNDIVIDED 1/16 INTEREST

2021-07-22, 15:40:24 Requestor: Linda Alexander

File Reference: 26420-148347 Declared Value \$ 780000

Registered Owner/Mailing Address:

RITCHIE ROY SUE, RCMP OFFICER #2201 - 1033 MARINASIDE CRESCENT

VANCOUVER, BC

V6Z 3A3

AS TO AN UNDIVIDED 1/16 INTEREST

Registered Owner/Mailing Address:

0765311 B.C. LTD., INC.NO. 765311

3326 PARKER STREET VANCOUVER, BC

V5K 2V9

AS TO AN UNDIVIDED 2/16 INTEREST

Registered Owner/Mailing Address:

0760251 B.C. LTD., INC.NO. 760251

3058 EAST 28TH AVENUE

VANCOUVER, BC

V5R 1S5

AS TO AN UNDIVIDED 2/16 INTEREST

Registered Owner/Mailing Address:

0765994 B.C. LTD., INC.NO. 765994

4636 TODD STREET VANCOUVER, BC

V5R 3P8

AS TO AN UNDIVIDED 2/16 INTEREST

Registered Owner/Mailing Address:

0765316 B.C. LTD., INC.NO. 765316

5664 WALES STREET VANCOUVER, BC

V5R 3N1

AS TO AN UNDIVIDED 2/16 INTEREST

**Taxation Authority** 

Maple Ridge, City of

**Description of Land** 

Parcel Identifier:

011-016-272

Legal Description:

LOT 3 SECTION 23 TOWNSHIP 12 NEW WESTMINSTER DISTRICT PLAN 4023

**Legal Notations** 

THIS CERTIFICATE OF TITLE MAY BE AFFECTED BY THE AGRICULTURAL LAND COMMISSION ACT, SEE AGRICULTURAL LAND RESERVE PLAN NO. 15 DEPOSITED JULY 30TH, 1974.

Page 3 of 4

#### TITLE SEARCH PRINT

2021-07-22, 15:40:24

Requestor: Linda Alexander

File Reference: 26420-148347 Declared Value \$ 780000

Charges, Liens and Interests

Nature:

SECURITIES ACT CHARGE

Registration Number:

BB3013226

Registration Date and Time:

2013-09-27 14:58

Registered Owner:

BRITISH COLUMBIA SECURITIES COMMISSION

Remarks:

INTER ALIA

SECTION 151, RESTRICTS DEALINGS

Nature:

**JUDGMENT** 

Registration Number: Registration Date and Time: CA6365586 2017-10-12 11:40

Registered Owner:

FARM CREDIT CANADA

Remarks:

AS TO THE INTEREST OF SIU KON SOO

RENEWED BY CA7639428

Nature:

**JUDGMENT** 

Registration Number:

CA6365587

Registration Date and Time:

2017-10-12 11:40

Registered Owner:

FARM CREDIT CANADA

Remarks:

**INTER ALIA** 

AS TO THE INTEREST OF SIU MUI WONG AND SIU

KON SOO

RENEWED BY CA7639427

Nature:

**JUDGMENT** 

Registration Number:

Registration Date and Time:

CA6591432 2018-01-26 14:00

Registered Owner:

BRITISH COLUMBIA SECURITIES COMMISSION

Remarks:

**INTER ALIA** 

AS TO THE INTEREST OF DEBBIE SIU MUI WONG AKA SIU

MUI WONG AND SIU KON SOO AKA BONNIE SOO

RENEWED BY CA7978405

Nature:

JUDGMENT

Registration Number:

CA7639427 2019-07-24 08:34

Registration Date and Time:

FARM CREDIT CANADA

Registered Owner: Remarks:

INTER ALIA

RENEWAL OF CA6365587

AS TO THE INTEREST OF SIU MUI WONG

Page 4 of 4

#### TITLE SEARCH PRINT

File Reference: 26420-148347

Declared Value \$ 780000

2021-07-22, 15:40:24

Requestor: Linda Alexander

Nature:

Registration Number:

Registration Date and Time: Registered Owner:

Remarks:

JUDGMENT

CA7639428 2019-07-24 08:34

FARM CREDIT CANADA

AS TO THE INTEREST OF SIU KON SOO

RENEWAL OF CA6365586

Nature:

Registration Number:

Registration Date and Time:

Registered Owner:

Remarks:

JUDGMENT

CA7837829

2019-10-30 09:08 HER MAJESTY THE QUEEN IN RIGHT OF CANADA

INTER ALIA

AS TO THE INTEREST OF GILBERT WAI HUNG WONG

Nature:

Registration Number:

Registration Date and Time:

Remarks:

INJUNCTION

CA7859608

2019-11-08 09:16

INTER ALIA

RESTRICTS DEALINGS

Nature:

Registration Number:

Registration Date and Time:

Registered Owner:

Remarks:

JUDGMENT

CA7978405

2020-01-14 11:41

BRITISH COLUMBIA SECURITIES COMMISSION

**INTER ALIA** 

AS TO THE INTEREST OF SIU MUI WONG

RENEWAL OF CA6591432

**Duplicate Indefeasible Title** 

NONE OUTSTANDING

**Transfers** 

NONE

**Pending Applications** 

Parcel Identifier:

011-016-272

Application Number/Type: Application Number/Type:

CA9183886 JUDGMENT CA9183909 JUDGMENT This is **Exhibit "E"** referred to in the Affidavit of Patty Wood made before me on July \_\_\_\_\_\_\_, 2021.

A COMMISSIONER FOR TAKING AFFIDAVITS FOR BRITISH COLUMBIA

2021-07-22, 15:51:37

File Reference: 26420-148347 Requestor: Linda Alexander

Declared Value \$367637

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

**Land Title District** 

NEW WESTMINSTER

Land Title Office

**NEW WESTMINSTER** 

**Title Number** 

CA7178386

From Title Number

BX385992

**Application Received** 

2018-11-07

**Application Entered** 

2018-11-22

Registered Owner in Fee Simple

Registered Owner/Mailing Address:

CHEN LIANG TAO, BUSINESSMAN JAE WAN CHOW. BUSINESSPERSON

19365 80TH AVENUE

SURREY, BC V4N 3G5

AS TO AN UNDIVIDED 1/4 INTEREST AS JOINT TENANTS

Registered Owner/Mailing Address:

NGAI FUNG CHOW, BUSINESSMAN

SAU LAN CHOW, BUSINESSPERSON

4388 INVERNESS STREET

VANCOUVER, BC

V5C 5C3

AS TO AN UNDIVIDED 1/4 INTEREST AS JOINT TENANTS

Registered Owner/Mailing Address:

SIU MUI WONG, BUSINESSPERSON WAI HUNG WONG, BUSINESSMAN

16863 58A AVENUE

SURREY, BC V3S 8P1

AS TO AN UNDIVIDED 1/4 INTEREST AS JOINT TENANTS

Registered Owner/Mailing Address:

DANNY CHOW

23 NORTH GLYNDE AVENUE

BURNABY, BC

V5B 1G8

EXECUTOR OF THE WILL OF NGAI MO CHOW, DECEASED, SEE

CA7178386

AS TO AN UNDIVIDED 1/4 INTEREST

**Taxation Authority** 

Maple Ridge, City of

2021-07-22, 15:51:37 File Reference: 26420-148347 Requestor: Linda Alexander

Declared Value \$367637

Description of Land

Parcel Identifier: 006-983-391

Legal Description:

EAST HALF LOT 13 SECTION 6 TOWNSHIP 15 **NEW WESTMINSTER DISTRICT PLAN 2721** 

NONE Legal Notations

Charges, Liens and Interests

MORTGAGE Nature: Registration Number: BX385993 Registration Date and Time: 2005-10-26 13:53

Registered Owner: SCOTIA MORTGAGE CORPORATION

**INCORPORATION NO. A23965** 

**JUDGMENT** Nature: Registration Number: CA6365587 Registration Date and Time: 2017-10-12 11:40

Registered Owner: FARM CREDIT CANADA

Remarks: INTER ALIA

AS TO THE INTEREST OF 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: **INTER ALIA** 

AS TO THE INTEREST OF DEBBIE SIU MUI WONG AKA

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: **INTER ALIA** 

RENEWAL OF CA6365587

AS TO THE INTEREST OF SIU MUI WONG

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

**RESTRICTS DEALINGS** 

2021-07-22, 15:51:37

Requestor: Linda Alexander

File Reference: 26420-148347

Declared Value \$367637

Nature:

Registration Number:

Registration Date and Time:

Registered Owner:

Remarks:

JUDGMENT CA7978405 2020-01-14 11:41

NDITION OO 11.41

BRITISH COLUMBIA SECURITIES COMMISSION

**INTER ALIA** 

AS TO THE INTEREST OF SIU MUI WONG

RENEWAL OF CA6591432

**Duplicate Indefeasible Title** 

NONE OUTSTANDING

**Transfers** 

NONE

**Pending Applications** 

Parcel Identifier:

006-983-391

Application Number/Type:

CA9183886 JUDGMENT

This is **Exhibit "F"** referred to in the Affidavit of Patty Wood made before me on July \_\_\_\_\_\_, 2021.

A COMMISSIONER FOR TAKING AFFIDAVITS FOR BRITISH COLUMBIA

2021-07-22, 15:44:47

File Reference: 26420-148347 Requestor: Linda Alexander

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

**Land Title District** 

Land Title Office

NEW WESTMINSTER

**NEW WESTMINSTER** 

**Title Number** 

BB1509955

From Title Number

CA2941583

**Application Received** 

2013-11-27

**Application Entered** 

2013-12-05

**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:

GILBERT WAI HUNG WONG, BUSINESSMAN

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

**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

2021-07-22, 15:44:47

File Reference: 26420-148347 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: GILBERT WAI HUNG WONG

Remarks: AS TO THE UNDIVIDED 1/4 INTEREST OF

DEBBIE SIU MUI WONG

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

2021-07-22, 15:44:47 File Reference: 26420-148347 Requestor: Linda Alexander

Nature: SECURITIES ACT CHARGE

Registration Number: BB3013226 Registration Date and Time: 2013-09-27 14:58

Registered Owner: BRITISH COLUMBIA SECURITIES COMMISSION

Remarks: **INTER ALIA** 

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: INTER ALIA

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: **INTER ALIA** 

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: **INTER ALIA** 

RENEWAL OF CA6365587

AS TO THE INTEREST OF DEBBIE SIU MUI WONG

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: INTER ALIA

AS TO THE INTEREST OF GILBERT WAI HUNG WONG

File Reference: 26420-148347

2021-07-22, 15:44:47

Requestor: Linda Alexander

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

**RESTRICTS DEALINGS** 

Nature: JUDGMENT Registration Number: CA7978405 Registration Date and Time: 2020-01-14 11:41

Registered Owner: BRITISH COLUMBIA SECURITIES COMMISSION

Remarks: INTER ALIA

AS TO THE INTEREST OF DEBBIE SIU MUI WONG

RENEWAL OF CA6591432

Duplicate Indefeasible Title NONE OUTSTANDING

Transfers NONE

**Pending Applications** 

Parcel Identifier: 000-616-583

Application Number/Type: CA9183886 JUDGMENT

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.

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

PETITIONER

AND:

SIU MUI "DEBBIE" WONG

and others

RESPONDENTS

# AFFIDAVIT



Barristers and Solicitors 1600 Cathedral Place 925 West Georgia Street Vancouver, BC V6C 3L2 Phone: (604) 685-3456

Attention: William L. Roberts Email: wroberts@lawsonlundell.com