



NO. S-198522  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF SECTION 179.1 (FORMERLY SECTION 152) 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

**NOTICE OF APPLICATION**

**Name of Applicant:** MNP Ltd., in its capacity as the Court-appointed receiver of certain assets, undertakings and properties of the Respondents and all proceeds therefrom (in such capacity, the "Receiver")

To: Service List attached hereto as **Schedule "A"**

TAKE NOTICE that an application will be made by the Applicant to the presiding judge at the Courthouse at 800 Smithe Street, in the City of Vancouver, in the Province of British Columbia on Wednesday, the 26<sup>th</sup> day of June, 2024 at 9:45 a.m. for the orders set out in Part 1 below.

The Applicant estimates that the application will take **5 minutes**.

- This matter is within the jurisdiction of an Associate Judge.
- This matter is not within the jurisdiction of an Associate Judge.

**Part 1: ORDERS SOUGHT**

1. An Order (the "**Distribution and Discharge Order**"), substantially in the draft form attached hereto as **Schedule "B"**:

- (a) authorizing the distribution of funds in such proportions and to such persons as set out in Appendix “C” to the Fourth Report of the Receiver;
- (b) discharging the Receiver as Receiver of the assets, undertaking and property of the Respondents, provided that, notwithstanding its discharge herein
  - (i) the Receiver shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein; and
  - (ii) the Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of MNP Ltd. in its capacity as Receiver;
- (c) approving the Receiver’s activities as set out in the Fourth Report of the Receiver filed herein; and
- (d) approving the fees and disbursements of the Receiver, including the fees and disbursements of the Receiver’s legal counsel, Lawson Lundell LLP.

A blackline of the Draft Distribution and Discharge Order to the Model Discharge Order is attached as **Schedule “C”**.

## **Part 2: FACTUAL BASIS**

1. In 2016, the British Columbia Securities Commission (the “**Commission**”) found that the Respondents, Sui Mui “Debbie” Wong (“**Wong**”) and Siu Kon “Bonnie” Soo (“**Soo**”) committed fraud in connection with a land development and securities scheme undertaken by them, in relation to two real estate development projects in Alberta: 306 acres in Wheatland County (the “**Wheatland Lands**”) and 158 acres in Rocky View County (the “**Rocky View #1 Lands**”).
2. As found by the Commission, Wong and Soo acquired the Wheatland Lands and the Rocky View #1 Lands in 2007 with the intention of developing and subdividing them, then selling the subdivided lots at a profit. The Wheatland Lands were acquired through Wheatland Industrial Park Inc. (now Origin Business Park Inc., “**Wheatland**”), a corporation formed by Wong and Soo. Wong and Soo acquired the Rocky View Lands through a company they controlled, and later sold the lands to 1300302 Alberta Inc. (“**1300302**”) and D&E Arctic Investments Inc. (“**D&E Arctic**”).
3. To raise money for the acquisition and development of the Wheatland Lands and the development of the Rocky View #1 Lands, Soo and Wong sold joint venture units to investors in each of the Wheatland Lands (the “**Wheatland JV**”), which were held in trust for investors, and the Rocky View #1 Lands (the “**Rocky View #1 JV**”), which were held by 1300302 and D&E Arctic as nominees for the investors.

4. In addition to the Wheatland Lands and Rocky View #1 Lands, Soo and Wong acquired further development lands in Rocky View (the “**Rocky View #2 Lands**”), which were also part of a joint venture (the “**Rocky View #2 JV**”, and, together with the Wheatland JV and the Rocky View #1 JV, the “**Alberta JVs**”) and held in trust for investors by 1305402 Alberta Inc. (“**1305402**”). The Alberta Court of Queen’s Bench (as it was then) directed a payment to the Receiver from the sale proceeds of the Rocky View #2 Lands in the amount of \$16,031.39 plus accrued proportionate interest in respect of Wong and Soo’s combined proportional interest held by 0774238 B.C. Ltd. (“**077**”) and D&C Atlantic Investments Inc. (“**D&C Atlantic**”).
5. Collectively, there are at least 134 investors in the Alberta JVs, who have lost approximately \$33 million as a result of their investments in those projects.
6. In early 2017, the Commission ordered various sanctions against Wong, Soo, 1300302 and D&E Arctic, arising from its findings of fraud, including sanctions under ss. 161(1)(g) and 162 of the *Securities Act*, totalling over \$15 million against each of Soo and Wong, \$2,785,000 against 1300302, and \$1,105,000 against D&E Arctic. The Sanctions Decision was registered with, and deemed to be a judgment of, this Court on March 3, 2017.
7. Before the Receiver was appointed, the Commission completed an investigation to locate the property owned or held by or on behalf of Wong, Soo, 1300302, and D&E Arctic. Among other things, the Commission determined that Wong and Soo’s exigible assets included certain interests in real property and in numerous bank accounts, and various corporations and joint ventures. Investors also alleged a tracing remedy against various assets owned by Soo and Wong’s family members and corporations controlled by them, including real property, in part because the money raised from investors were used to acquire such assets.
8. On October 3, 2019, the Commission sought and obtained an order (the “**Receivership Order**”) in these proceedings under ss. 151 and 152 of the *Securities Act* appointing the Receiver to undertake the orderly investigation of assets, and recovery and distribution of funds to investors defrauded in connection with the Alberta JVs, and to evaluate all potential claims against the Respondents and fairly and efficiently distribute funds to investors.
9. The Receivership Order was amended twice to expand the undertaking, assets and property over which the Receiver was appointed.
10. By Order pronounced May 23, 2023, the activities of the Receiver from November 22, 2022, to May 8, 2023 were approved by the Court. These activities are set out in detail in the Third Report, and included the following:

- (a) maintaining and updating the Service List and the Receiver's website for the receivership proceedings;
  - (b) receiving and responding to various creditor and stakeholder inquiries;
  - (c) reviewing additional information received from certain financial institutions in respect of funds received to date; and
  - (d) continuing to deposit funds held in trust on account of this receivership into Guaranteed Investment Certificates in order to earn interest income.
11. As set out more fully in the Receiver's reports to date, the Receiver has now completed all reasonable efforts to recover property within its mandate, and holds funds totalling \$2,199,767.32 as at June 5, 2024 (the "**Receivership Funds**") for distribution to investors with admitted claims, subject to any unpaid costs and fees (including legal fees and disbursements) of the Receiver that may accrue prior to the date of distribution.
12. A Claims Process Order was granted herein on May 31, 2023, enabling the Receiver to identify and determine the claims of persons who invested in the Alberta JVs, and to ensure the proper and timely distribution of the Receivership Funds.
13. By way of summary, the Claims Process Order provides, in relevant part:
- (a) that notice of the current proceedings and the claims process may be given by posting notice to the Receiver's designated website in respect of this receivership;
  - (b) a means of administering the claims process, including directions on how a Claimant must complete and submit a Proof of Claim to the Receiver, and when a Proof of Claim may be barred;
  - (c) a means of adjudicating the Proof of Claims and a process for a Claimant to appeal a Notice of Disallowance issued by the Receiver;
  - (d) a scheme for distribution of the Receivership Funds to all Proven Creditors (as those terms are defined in the Claims Process Order); and
  - (e) draft versions of the Instruction Letter, Notice to Creditors, Proof of Claim, and Notice of Disallowance.
14. As described in the Receiver's Fourth Report (the "**Fourth Report**"), the Receiver administered a claims process in accordance with the Claims Process Order, and has admitted claims totalling \$12,583,411.61. The Receiver has proposed a pro rata distribution of the Receivership Funds to those investors with admitted claims.

15. The Receiver's fees and administration costs incurred in this matter from May 1, 2023 to May 31, 2024, totalled \$128,342.79 (including applicable taxes), as summarized in the Fourth Report.
16. The time and disbursements incurred by the Receiver in the course of its duties are fair and reasonable in a receivership of the nature described herein. In the Receiver's opinion, the cost of this receivership is comparable to receivership assignments of similar scale and complexity.
17. The hourly rates charged by the Receiver are consistent with the average hourly rates billed by the Receiver on its other engagements and, to the Receiver's knowledge, consistent with other insolvency firms of comparable size engaged on similar receivership matters.
18. The Receiver requests that the Court summarily approve the Receiver's fees incurred from May 1, 2023 to May 31, 2024.
19. The Receiver engaged Lawson Lundell LLP (“**Lawson**”) as its independent legal counsel. The total fees of Lawson from May 1, 2023 to April 30, 2024, were \$17,856.16, inclusive of disbursements and applicable taxes, as summarized in Appendix “F” to the Receiver’s Third Report.
20. The Receiver has reviewed the invoices rendered to it by Lawson and believes them to be reasonable and proper. The legal services provided were necessary for the Receiver to fulfill its obligations in the proceeding.
21. The Receiver requests that the Court summarily approve the legal fees and disbursements incurred by the Receiver from May 1, 2023 to April 30, 2024.
22. The Receiver estimates that it will incur \$13,000.00 in further legal costs to conclude the receivership, including obtaining its discharge.
23. The Receiver is seeking an Order that that the Receiver be discharged.

### **Part 3 LEGAL BASIS**

24. Subject to the remaining issues outlined in the Fourth Report, the Receiver has completed its duties in accordance with the terms of the Receivership Order such that the Receiver ought to now be discharged.
25. The professional fees and disbursements herein are fair and reasonable, and accurately reflect the work completed in connection with the receivership to date.
26. Rule 10-2(3) provides that the Court must fix any remuneration to be paid to the Receiver.

27. Paragraph 23 of the Receivership Order provides that the Receiver and its legal counsel shall pass their accounts from time to time, and contemplates that such an application will be heard on a summary basis.
28. The Claims Process Order made herein contemplates that notice of these proceedings will be provided by the Receiver to interested persons by creating and maintaining a dedicated website for that purpose. As such, no further notice of the Receiver's discharge or other orders sought herein is necessary.

**Part 4: MATERIAL TO BE RELIED ON**

29. The Receiver's First Report to the Court dated April 6, 2022;
30. The Second Amended and Restated Receivership Order granted on June 29, 2022;
31. The Receiver's Second Report to the Court dated November 22, 2022;
32. The Receiver's Third Report to the Court, dated May 8, 2023, and filed concurrently herewith;
33. Order Made After Application (Claims Process) granted May 31, 2023;
34. The Receiver's Fourth Report to the Court, dated June 10, 2023, and filed concurrently herewith;
35. The Affidavit #10 of Patty Wood sworn herein on June 10, 2024;
36. The Affidavit #4 of William L. Roberts sworn herein on June 10, 2024; and
37. Such further and other material as counsel may advise and this Honourable Court may permit.

TO THE PERSONS RECEIVING THIS NOTICE OF APPLICATION: If you wish to respond to this Notice of Application, you must, within 5 business days after service of this Notice of Application or, if this application is brought under Rule 9-7, within 8 business days after service of this Notice of Application.

- (a) file an Application Response in Form 33,
- (b) file the original of every affidavit, and every other document, that
  - (i) you intend to refer to at the hearing of this application, and
  - (ii) has not already been filed in the proceeding, and

- (c) serve on the applicant 2 copies of the following, and on every other party of record one copy of the following:
- (i) a copy of the filed Application Response;
  - (ii) a copy of each of the filed affidavits and other documents that you intend to refer to at the hearing of this application and that has not already been served on that person;
  - (iii) if this application is brought under Rule 9-7, any notice that you are required to give under Rule 9-7(9).

Dated at the City of Vancouver, in the Province of British Columbia, this 12<sup>th</sup> day of June, 2024.

Lawson Lundell LLP "AMN."

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Lawson Lundell LLP  
Solicitors for the Applicant

This Notice of Application is filed by William Roberts, of the law firm of Lawson Lundell LLP, whose place of business and address for delivery is 1600 – 925 West Georgia Street, Vancouver, British Columbia, V6C 3L2, e-mail address: wroberts@lawsonlundell.com; telephone number: 604-685-3456.

*To be completed by the court only:*

Order made

in the terms requested in paragraphs \_\_\_\_\_ of Part 1 of this Notice of Application

with the following variations and additional terms:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date:

\_\_\_\_\_  
Signature of  Judge  Associate Judge



**APPENDIX**

The following information is provided for data collection purposes only and is of no legal effect.

**THIS APPLICATION INVOLVES THE FOLLOWING:**

- discovery: comply with demand for documents
- discovery: production of additional documents
- other matters concerning document discovery
- extend oral discovery
- other matter concerning oral discovery
- amend pleadings
- add/change parties
- summary judgment
- summary trial
- service
- mediation
- adjournments
- proceedings at trial
- case plan orders: amend
- case plan orders: other
- experts
- none of the above

**SCHEDULE "A"**

NO.  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF  
SECTION 152 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

**SERVICE LIST**

<p><b>Counsel for the Receiver:</b></p> <p><b>William Roberts</b> Lawson Lundell LLP 1600 – 925 West Georgia Street, Vancouver, B.C., V6C 3L2 Telephone: (604) 631-9163 Email: <a href="mailto:wroberts@lawsonlundell.com">wroberts@lawsonlundell.com</a></p>	<p><b>Receiver:</b></p> <p><b>Patty Wood</b> MNP Ltd. Suite 2200, MNP Tower 1021 West Hastings Street Vancouver, BC V6E 0C3 Telephone: (604) 685-8408 Email: <a href="mailto:patty.wood@mnp.ca">patty.wood@mnp.ca</a></p>
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<b>Petitioner</b>	
<p><b>Counsel for the Petitioner:</b>  <b>British Columbia Securities Commission</b></p> <p><b>William Roberts</b>            Lawson Lundell LLP            1600 – 925 West Georgia Street,            Vancouver, B.C.,            V6C 3L2            Telephone: (604) 631-9163            Email: <a href="mailto:wroberts@lawsonlundell.com">wroberts@lawsonlundell.com</a></p>	
<b>Respondents</b>	
<p><b>Siu Mui “Debbie” Wong</b>            16863 -58A Avenue            Surrey, BC V3S8P1  <a href="mailto:debbie16863@hotmail.com">debbie16863@hotmail.com</a></p>	<p><b>Siu Kon “Bonnie” Soo</b>            3311 Barmond Avenue            Richmond, BC V7E 1A1  <a href="mailto:siukonsoo@gmail.com">siukonsoo@gmail.com</a></p>
<p><b>1300302 Alberta Inc.</b>            1101, 3961 – 52<sup>nd</sup> Avenue NE            Calgary, AB T3J 0J7</p>	<p><b>D &amp; E Arctic Investments Inc.</b>            c/o Debbie Wong            16863 58A Avenue            Surrey, BC V3S 8P1</p>
<p><b>Origin Business Park, formerly known as            Wheatland Industrial Park Inc.</b>            1500, 222 – 3<sup>rd</sup> Avenue SW            Calgary, AB T2P 0B4</p>	
<b>Soo + Wong Companies</b>	
<p><b>1342565 Alberta Inc.</b>            c/o Austin Wong in his capacity as Director of  <b>1342565 Alberta Inc.</b>            56 – 6747 203 Street            Langley, BC V2Y 3B5</p>	<p><b>D &amp; C Atlantic Investments Inc</b>            c/o Debbie Wong, in her capacity as a senior officer            of D &amp; C Atlantic Investments Inc.            16863 -58A Avenue            Surrey, BC V3S8P1  <a href="mailto:debbie16863@hotmail.com">debbie16863@hotmail.com</a></p>
<p><b>0793751 BC Ltd.</b>            c/o Its Registered Office            16863 58A Avenue            Surrey, BC V3S 8P1</p>	<p><b>0765306 B.C. Ltd.</b>            c/o Registered Office            16863 – 58A Avenue            Surrey, BC V3S 8P1  <b>(DISSOLVED)</b></p> <p><b>CC:</b>  <b>Colleen Soo in her capacity as Director of            0765306 B.C. Ltd.</b>            3311 Barmond Avenue            Richmond, BC V7E 1A1</p>

<p><b>1376472 Alberta Ltd.</b>  c/o Debbie Wong, in her capacity as a senior officer of 1376472 Alberta Ltd.  16863 -58A Avenue  Surrey, BC V3S8P1  <a href="mailto:debbie16863@hotmail.com">debbie16863@hotmail.com</a></p>	<p><b>0879932 B.C. Ltd.</b>  c/o Its Registered Office  16863 58A Avenue  Surrey, BC V3S 8P1</p>
<p><b>0790333 B.C. Ltd.</b>  c/o Its Registered Office  Suite 205, 15240 – 56 Avenue  Surrey, BC V3S 5K7  <b>(STRUCK)</b></p> <p><b>CC:</b>  <b>Justin John Wing Soo in his capacity as Director of 0790333 B.C. Ltd.</b>  3311 Barmond Avenue  Richmond, BC V7E 1A1</p>	<p><b>0745188 B.C. Ltd.</b>  c/o Registered Office  205, 15240 – 56<sup>th</sup> Avenue  Surrey, BC V3S 5K7  <b>(DISSOLVED)</b></p> <p><b>CC:</b>  <b>Justin Soo in his capacity as Director of 0745188 B.C. Ltd.</b>  3311 Barmond Avenue  Richmond, BC V7E 1A1</p>
<p><b>0774238 B.C. Ltd.</b>  c/o Its Registered Office  16863 58A Avenue  Surrey, BC V3S 8P1</p>	<p><b>1192657 Alberta Ltd.</b>  c/o <b>Austin Wong in his capacity as Director of 1192657 Alberta Inc.</b>  56 – 6747 203 Street  Langley, BC V2Y 3B5</p>
<p><b>1342558 Alberta Inc.</b>  c/o Registered Office  1101, 3961 52 Avenue NE  Calgary, AB T3J 0J7</p> <p><b>1342558 Alberta Inc. c/o Austin Wong in his capacity as Director of 1342558 Alberta Inc.</b>  56 – 6747 203 Street  Langley, BC V2Y 3B5</p>	<p><b>New City Enterprises Ltd.</b>  c/o Its Registered Office  501 – 1195 West Broadway  Vancouver, BC V6H 3X5</p>
<b>Non-Respondents (Joint Owners/Chargeholders)</b>	
<p><b>Gilbert Wei Hung Wong</b>  c/o Austin Wong and Derek Wong, Executors of the Will of Wai Hung Wong, Deceased  c/o Lindsay Kenney LLP  Suite 1800, 401 West Georgia Street  Vancouver, B.C. V6B 5A1  <b>Attention:</b> J. Reilly Pollard  <a href="mailto:RPollard@lklaw.ca">RPollard@lklaw.ca</a></p>	<p><b>Kwok Kie Soo</b>  3311 Barmond Avenue  Richmond, BC V7E 1A1  <a href="mailto:kwokiesoo@gmail.com">kwokiesoo@gmail.com</a></p>
<p><b>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</b>  c/o Edwin Soon Law Office  609 – 938 Howe Street  Vancouver, B.C. V6Z 1N9</p>	<p><b>Derek Wai Git Wong</b>  #18 – 17555 57A Avenue  Surrey, BC V3S 7V2  Email: <a href="mailto:derek_van97@hotmail.com">derek_van97@hotmail.com</a></p>

<b>His Majesty the King Right of Canada, as Represented by the Attorney General of Canada</b> c/o Department of Justice 900 – 840 Howe Street Vancouver, BC V6Z 2W9 <a href="mailto:gordon.carscadden@justice.gc.ca">gordon.carscadden@justice.gc.ca</a>		<b>Farm Credit Canada</b> Adnan Habib Erin Stewart, Paralegal Baker Newby LLP 200 – 2955 Gladwin Road Abbotsford, BC V2T 5T4 Email: <a href="mailto:AHabib@bakernewby.com">AHabib@bakernewby.com</a> <a href="mailto:ESTewart@bakernewby.com">ESTewart@bakernewby.com</a>
<b>Non-Respondents (Investors with proven claims)</b>		
<b>Thomas Leung</b> 1209 – 5177 Brighthouse Way Richmond, BC V7C 0A7 <a href="mailto:tomleung88@hotmail.com">tomleung88@hotmail.com</a>		<b>Vicky Chou</b> 404 – 123 West 1 <sup>st</sup> Street North Vancouver, BC V7M 0E5 <a href="mailto:vickychou10@gmail.com">vickychou10@gmail.com</a>
<b>Non-Respondents (Investor Groups)</b>		
Action No.	Plaintiffs	Counsel
1401-10536 (ABQB)	DYMI Investments Ltd.	Michael Bokhaut Stones Carbert Waite LLP 200 Encor Place, 645 – 7 <sup>th</sup> Avenue SW Calgary, AB T2P 4G8  Email: <a href="mailto:bokhaut@carbertwaite.com">bokhaut@carbertwaite.com</a>
1801-07295 (ABQB)	1305402 Alberta Inc.	c/o Registered Office 1101, 3961 52 Avenue NE Calgary, AB T3J 0J7  <b>1305402 Albert Inc., c/o Kwok Kie Soo, in his capacity as Director of 1305402 Alberta Inc.</b> 3311 Barmond Avenue Richmond, BC V7E 1A1 <a href="mailto:kwokiesoo@gmail.com">kwokiesoo@gmail.com</a>
S-134693	1734454 Ontario Ltd. (Ken Chan) 2125876 Ontario Ltd. (King Luen Yeung) 2125875 Ontario Ltd. and Yen Chia Yeung Elaine Cho and Mud Yau Cho 0795641 B.C. Ltd. (Tom Wong) 0795641 B.C. Ltd. (Larry Yee) 0795641 B.C. Ltd. (Simon So) Heng Sheng Development Co. Ltd. (Hank Yung and Patrick Tong) 0795213 B.C. Ltd. (Jonathan Ng) 0776137 B.C. Ltd. (Ai Hong “Ivy” He) 0795769 B.C. Ltd. (Brenda Po Yin Leung)	Mark Pontin Fasken Martineau DeMoulin LLP 2900-550 Burrard Street Vancouver, BC V6C 0A3  Email: <a href="mailto:mpontin@fasken.com">mpontin@fasken.com</a>

	<p>Ho Jing Investments Ltd. (Tung Mui Wong)  0792543 B.C. Ltd. (Tung Mui Wong)  S. Kong Development Co. Ltd.  Steven Kong and Goey Kong  0767013 B.C. Ltd. (Wai Ling Kong and Darryl Kong)  Yong A "Clara" Kim  Kai Yen Cho and Hung Tern Kong  Shao Qing Zhou  Hui Fen Zhou  0792600 B.C. Ltd. (Wei Fong Chau)  Fortune Peak Investments Inc.  Ping Chang "Amy" Huang  Da Sen "Sam" Huang  Wei Qiang Wu  Helen Situ  Wen Zhan "Susana" Fang  0793067 B.C. Ltd. (Li Ming Dong and Yong Hua Tang)  0795205 B.C. Ltd. (Serena Wen)  2  Chinook Alize Enterprises Ltd. (Mei Ching Li)  0798331 B.C. Ltd. and Law Ng Young  0798331 B.C. Ltd. and Tony Jonathan Chew  0798331 B.C. Ltd. and Yuet-Kau Chew  0792142 B.C. Ltd. (Shelly Wong, Susan Chong and David Chan)  Robert Pang  0795257 B.C. Ltd. (Alice Woo, Justin Wu, Henry Wu, and Lai Wan Ip)  0795257 B.C. Ltd. (Yung Yung Hui)  Xue Ju Yang  0796367 B.C. Ltd. (Mei Ling "May" Yang and Stephen So)  0796367 B.C. Ltd. (Chun "Felix" Lam)  0796367 B.C. Ltd. (Nan "Dolphin" Jiang)  Zhao Dong Liang  Chou Jie Sie</p>	
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	0796372 B.C. Ltd. (Sandy Qiao Ying Yee) Shi Ying Deng Lily Tan and Dudley Tan Steven Wong Chia Chih Tan and Sung Hua Ma Kwong Wing Leung Enterprises Ltd. John Doe Jane Doe Doe Corporation	
S-139102	Wheatland Industrial Park Inc. Chang Wei Tile Ltd. Super Tile & Construction Ltd. Bill Fong Investment Ltd. S.F. Investment Ltd. Ru Zhu Investment Ltd. 0794263 Ltd. 0794271 B.C. Ltd. 0805671 B.C. Ltd. 0805665 B.C. Ltd. 0792984 B.C. Ltd.	Winston Kam Remedios & Company 1010-1030 W Georgia Street, Vancouver, BC V6E 2Y3  Email: <a href="mailto:wkam@remediosandcompany.com">wkam@remediosandcompany.com</a>
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vickyhou10@gmail.com



**SCHEDULE "B"**

NO. S-198522  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF SECTION 179.1 (FORMERLY SECTION 152) OF THE *SECURITIES ACT*, RSBC 1996, C. 418

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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

**ORDER MADE AFTER APPLICATION**

**DISCHARGE ORDER**

BEFORE THE HONOURABLE JUSTICE ) WEDNESDAY, THE 26<sup>TH</sup> DAY  
)  
) OF JUNE, 2024

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 at Vancouver, British Columbia, on the 26<sup>th</sup> day of June, 2024; AND ON HEARING Baylee Hunt, counsel for the Receiver and no one appearing for the Petitioner, the Respondents or the Interested Parties as listed on the Service List, although duly served, AND UPON READING the material filed, including the Receiver's Fourth Report to the Court dated for reference June 10, 2024 (the "Fourth Report");

THIS COURT ORDERS AND DECLARES THAT:

1. The activities of the Receiver, as set out in the Fourth Report, are hereby approved.

2. The receipts and disbursements of the Receiver, as set out in the Receiver's Statement of Receipts and Disbursements, attached as Appendix "A" to the Fourth Report, are hereby approved.
3. The fees and disbursements of the Receiver as set out at Appendix "D" to the Fourth Report, including its fees and disbursements from May 1, 2023 to May 31, 2024, and its estimated fees and disbursements to complete its duties in connection with this receivership, are hereby approved.
4. The fees and disbursements of the Receiver's legal counsel as set out at Appendix "F" to the Fourth Report, including its fees and disbursements from May 1, 2023 to April 30, 2024, and its estimated fees and disbursements to complete its duties in connection with this receivership, are hereby approved.
5. After payment of the fees and disbursements of the Receiver and its legal counsel as herein approved, the Receiver shall distribute the remaining Receivership Funds (as that term is defined in the herein Notice of Application) as set out in Appendix "C" to the Fourth Report, provided that, if any trust cheques issued to investors on account of the Receivership Funds remain uncashed and become stale-dated, or any such payment is otherwise not collected (the "**Unclaimed Payments**"):
  - (a) the Receiver shall remit the Unclaimed Payments, if any, into Court to the credit of the receivership proceeding, together with a list of those investors entitled to receive the Unclaimed Payments (the "**Unpaid Investors**"), and specifying the amount of each Unpaid Investor's entitlement; and
  - (b) the Unpaid Investors shall be entitled to apply for payment of the Unclaimed Payments out of Court.
6. Upon payment of the amounts set out in paragraph 5 of this Order, and on filing a Receiver's Certificate in substantially the form attached hereto as Schedule "A", the Receiver shall be discharged as Receiver of the assets, undertaking and property of the Debtors, provided that notwithstanding its discharge herein:
  - (a) the Receiver shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein; and
  - (b) the Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of MNP Ltd. in its capacity as Receiver.
7. MNP Ltd. is hereby released and discharged from any and all liability that MNP Ltd. now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions

of MNP Ltd. while acting in its capacity as Receiver herein. Without limiting the generality of the foregoing, MNP Ltd. is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in the within receivership proceedings, save and except for any gross negligence or wilful misconduct on its part.

8. Providing notice of the herein application and orders sought, once granted, by publishing such application materials and subsequent orders on the Receiver's website maintained in respect of this receivership shall constitute good and sufficient service and delivery of such application materials and orders on any person who may be entitled to receive service or notice thereof, and no other document or material need be sent to or served upon any person in respect of the herein application or orders sought.

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:

---

Signature of Baylee Hunt

Party  Lawyer for the Petitioners

BY THE COURT

---

REGISTRAR

**SCHEDULE "A"**

NO. S-198522  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF SECTION 179.1 (FORMERLY SECTION 152) 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

**RECEIVER'S CERTIFICATE OF COMPLETION**

Pursuant to the Order made June 26, 2024 in these proceedings (the "Discharge Order"), MNP Ltd. files this Certificate with this Honourable Court as confirmation that it has completed all outstanding and required activities as set out in the Receiver's Reports and Fee Affidavits, such that, subject to paragraph 6 of the Discharge Order, it is hereby discharged, and attaches its Final Statement of Receipts and Disbursements in that respect.

Dated: \_\_\_\_\_, 2024

**MNP Ltd., in its capacity as Court  
Appointed Receiver**

Per: \_\_\_\_\_

**SCHEDULE "C"**

~~MODEL DISCHARGE ORDER~~ NO. S-198522

*[Current to August 1, 2015]*

No. \_\_\_\_\_  
\_\_\_\_\_  
Registry  
VANCOUVER REGISTRY

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

IN THE MATTER OF SECTION 179.1 (FORMERLY SECTION 152) OF THE SECURITIES  
ACT, RSBC 1996, C. 418

BETWEEN:

BRITISH COLUMBIA SECURITIES COMMISSION

[PLAINTIFF(S)/PETITIONER(S)]

<PLAINTIFF[S] / <PETITIONER[S]>

AND:

[DEFENDANT(S)/RESPONDENT(S)]

<DEFENDANT[S] / <RESPONDENT[S]>

Action No. \_\_\_\_\_  
Estate No. \_\_\_\_\_

~~IN THE SUPREME COURT OF BRITISH COLUMBIA  
IN BANKRUPTCY AND INSOLVENCY~~

~~IN THE MATTER OF THE RECEIVERSHIP OF~~

[NAME OF DEBTOR(S)]

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

ORDER MADE AFTER APPLICATION

**DISCHARGE ORDER**

BEFORE THE HONOURABLE JUSTICE ) WEDNESDAY, THE 26<sup>TH</sup> DAY  
)  
) dd/mm/yyyy  
)

OF JUNE, 2024

THE APPLICATION of [RECEIVER'S NAME] MNP Ltd., in its capacity as Court-appointed [Receiver or Receiver and Manager] (the "Receiver") of the assets, undertakings and properties of [Name of Debtor] 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 at Vancouver, British Columbia, on the 26<sup>th</sup> day of June, 2024; AND ON HEARING Baylee Hunt, counsel for the Receiver, and ~~these other~~ counsel listed on Schedule "A" hereto; no one appearing for the Petitioner, the Respondents or the Interested Parties as listed on the Service List, although duly served, AND UPON READING the material filed, including the Receiver's Fourth Report of the Receiver Court dated for reference June 10, 2024 (the "Fourth Report") [1];

THIS COURT ORDERS AND DECLARES THAT:

1. The activities of the Receiver, as set out in the Fourth Report, are hereby approved.
2. The fees receipts and disbursements of the Receiver and its, as set out in the Receiver's Statement of Receipts and Disbursements, attached as Appendix "A" to the Fourth Report, are hereby approved.
3. The fees and disbursements of the Receiver as set out at Appendix "D" to the Fourth Report, including its fees and disbursements from May 1, 2023 to May 31, 2024, and its estimated fees and disbursements to complete its duties in connection with this receivership, are hereby approved.
4. The fees and disbursements of the Receiver's legal counsel, as set out in Appendix "F" to the Fourth Report and the Fee Affidavit, including its fees and disbursements from May 1, 2023 to April 30, 2024, and its estimated fees and disbursements to complete its duties in connection with this receivership, are hereby approved. [2]
5. ~~3.~~ After payment of the fees and disbursements of the Receiver and its legal counsel as herein approved, the Receiver shall pay all funds distribute the remaining in its hands to [NAME OF PARTY] Receivership Funds (as that term is defined in the herein Notice of Application) as set out in Appendix "C" to the Fourth Report, provided that, if any trust cheques issued to investors on account of the Receivership Funds remain uncashed and

become stale-dated, or any such payment is otherwise not collected (the "Unclaimed Payments"):

- (a) the Receiver shall remit the Unclaimed Payments, if any, into Court to the credit of the receivership proceeding, together with a list of those investors entitled to receive the Unclaimed Payments (the "Unpaid Investors"), and specifying the amount of each Unpaid Investor's entitlement; and
- (b) the Unpaid Investors shall be entitled to apply for payment of the Unclaimed Payments out of Court.~~[3]~~

6. ~~4.~~ Upon payment of the amounts set out in paragraph ~~3~~ hereof [5 of this Order, and upon the on filing a Receiver filing a certificate certifying that it has completed the remaining outstanding activities described's Certificate in substantially the Report] ~~[4] form attached hereto as Schedule "A",~~ the Receiver shall be discharged as Receiver of the assets, undertaking and property of the ~~Debtor~~ Debtors, provided that notwithstanding its discharge herein: ~~(a)~~

- (a) the Receiver shall remain Receiver for the performance of such incidental duties as may be required to complete the administration of the receivership herein; and ~~(b)~~
- (b) the Receiver shall continue to have the benefit of the provisions of all Orders made in this proceeding, including all approvals, protections and stays of proceedings in favour of [RECEIVER'S NAME] MNP Ltd. in its capacity as Receiver.

~~5.~~ [Release of Receiver.] [5]

~~6.~~ Notwithstanding any provision herein, this Order shall not affect any person to whom notice of these proceedings was not delivered as required by the *Bankruptcy and Insolvency Act* and regulations thereto, any other applicable enactment or any other Order of this Court.

~~[6]~~

7. MNP Ltd. is hereby released and discharged from any and all liability that MNP Ltd. now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions of MNP Ltd. while acting in its capacity as Receiver herein. Without limiting the generality of the foregoing, MNP Ltd. is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in

the within receivership proceedings, save and except for any gross negligence or wilful misconduct on its part.

- 8. Providing notice of the herein application and orders sought, once granted, by publishing such application materials and subsequent orders on the Receiver's website maintained in respect of this receivership shall constitute good and sufficient service and delivery of such application materials and orders on any person who may be entitled to receive service or notice thereof, and no other document or material need be sent to or served upon any person in respect of the herein application or orders sought.

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:

\_\_\_\_\_  
Signature of Baylee Hunt

Party  Lawyer for the Petitioners

\_\_\_\_\_  
<Print Name>

\_\_\_\_\_  
Signature of

Party  Lawyer for <name of party(ies)>

\_\_\_\_\_  
<Print Name>

BY THE COURT

\_\_\_\_\_  
REGISTRAR



**BRITISH COLUMBIA MODEL DISCHARGE ORDER-**  
**EXPLANATORY NOTES**

B.C. Model Insolvency Order Committee,  
Vancouver, British Columbia

These Notes are to be read together with the model Discharge Order developed by the B.C. Model Insolvency Order Committee (as described below).

[1] — This model order assumes that the time for service does not need to be abridged.

[2] — This model order assumes the approval of the Receiver's fees and disbursements is done on a summary basis. If the Court determines that the assessment of the Receiver's fees and disbursements should be assessed by a Registrar, then this paragraph should be changed to read: "The Receiver shall pass its accounts before a Registrar of the Supreme Court who shall prepare a report and recommendation to the Court." The balance of the relief provided for in this model order should in such case be deleted and can be sought on the subsequent application for approval of the Registrar's report.

[3] — This model order assumes that the material filed supports a distribution to a specific secured creditor or other party.

[4] — Counsel should consider including this provision only if the Receiver's Report identifies any outstanding matters that should be completed before the Receiver's discharge.

[5] — The BCMIOC was divided as to whether a general release might be appropriate. On the one hand, the Receiver has presumably reported its activities to the Court, and presumably the reported activities have been approved in prior Orders. Moreover, the Order that appointed the Receiver likely has protections in favour of the Receiver. These factors tend to indicate that a general release of the Receiver is not necessary. On the other hand, the Receiver has acted only in a representative capacity and as the Court's officer, so the Court may be of the view that it is appropriate to insulate the Receiver from liability by way of a general release. Some members of the BCMIOC felt that, absent a general release, Receivers might hold back funds and/or wish to conduct a claims bar process, which would unnecessarily add time and cost to the receivership.

— Without intending to express an opinion as to whether a general release is appropriate, the BCMIOC has decided not to include the general release language in the body of the model order. Whether such language is appropriate is a matter to be considered by the presiding Judge based on the specific circumstances of the case. If this relief is being sought, stakeholders should be specifically advised and given ample notice.

~~\_\_\_\_\_ If a general release is ordered, the language approved by the BCMIOC is as follows:~~

~~5. \_\_\_\_\_ [RECEIVER'S NAME] is hereby released and discharged from any and all liability that [RECEIVER'S NAME] now has or may hereafter have by reason of, or in any way arising out of, the acts or omissions of [RECEIVER'S NAME] while acting in its capacity as Receiver herein. Without limiting the generality of the foregoing, [RECEIVER'S NAME] is hereby forever released and discharged from any and all liability relating to matters that were raised, or which could have been raised, in the within receivership proceedings.~~

~~[6] \_\_\_\_\_ If not included in a previous report, the Receiver should include in the Report filed in support of the application evidence that the Receiver satisfied its notice obligations, including under the *Bankruptcy and Insolvency Act*.~~

**SCHEDULE "A"**

**NO. S-198522**  
**VANCOUVER REGISTRY**

**IN THE SUPREME COURT OF BRITISH COLUMBIA**

**IN THE MATTER OF SECTION 179.1 (FORMERLY SECTION 152) 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**

**RECEIVER'S CERTIFICATE OF COMPLETION**

**Pursuant to the Order made June 26, 2024 in these proceedings (the "Discharge Order"),**  
**MNP Ltd. files this Certificate with this Honourable Court as confirmation that it has completed**  
**all outstanding and required activities as set out in the Receiver's Reports and Fee Affidavits,**  
**such that, subject to paragraph 6 of the Discharge Order, it is hereby discharged, and attaches its**  
**Final Statement of Receipts and Disbursements in that respect.**

**Dated: \_\_\_\_\_, 2024**

**MNP Ltd., in its capacity as Court**  
**Appointed Receiver**

**Per:**

Document comparison by Workshare Compare on Tuesday, June 11, 2024  
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