



NO. S198522
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. (the "Applicant" or the "Receiver"), in its capacity as receiver, without security, of certain assets 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. (the "Debtors")

To:

**The Petitioner, British Columbia
Securities Commission**
c/o Lawson Lundell LLP
1600 – 925 West Georgia Street
Vancouver, BC V6C 3L2
Attention: William L. Roberts
wroberts@lawsonlundell.com

Respondent, Siu Mui "Debbie" Wong
16863 -58A Avenue
Surrey, BC V3S8P1
debbie16863@hotmail.com

Respondent, Siu Kon "Bonnie" Soo
3311 Barmond Avenue
Richmond, BC V7E 1A1
siukonsoo@gmail.com

Respondent, 1300302 Alberta Inc.
1101, 3961 – 52nd Avenue NE
Calgary, AB T3J 0J7

Respondent, Kwok Kie Soo
3311 Barmond Avenue
Richmond, BC V7E 1A1
kwokiesoo@gmail.com

Chen and Leung
Barristers and Solicitors
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Vancouver, BC V6B 1Z6
aleung@cllawyers.ca

Respondent, Farm Credit Canada
c/o Baker Newby LLP
200-2955 Gladwin Rd.
Abbotsford, BC V2T 5T4
Attention: Adnan N. Habib
ahabib@bakernewby.com

Email: oppenheim@carberrwaite.com

DYMI Investments Ltd.
c/o Joseph G. Oppenheim
Stones Carbert Waite LLP
200 Encor Place, 645 – 7th Avenue SW
Calgary, AB T2P 4G8

Plaintiffs in Action S-134693

c/o Mark Pontin
Fasken Martineau DeMoulin LLP
2900-550 Burrard Street
Vancouver, BC V6C 0A3

**Respondent, Origin Business Park,
formerly known as Wheatland Industrial
Park Inc.**
c/o Registered Office
1500, 222 – 3rd Avenue SW
Calgary, AB T2P 0B4

Respondent, D & E Arctic Investments Inc.
c/o Debbie Wong in her capacity as Director
of D & E Arctic Investments Inc.
16863 58A Avenue
Surrey, BC V3S 8P1
debbie16863@hotmail.com

**Respondent, Austin Wong and Derek
Wong in their capacities as joint executors
of the Estate of Gilbert Wong**
c/o Lindsay Kenney LLP
Suite 1800, 401 West Georgia Street
Vancouver, B.C. V6B 5A1
Attention: J. Reilly Pollard
RPollard@lklaw.ca

**Her Majesty the Queen Right of Canada,
as Represented by the Attorney General of
Canada**
c/o Department of Justice
900 – 840 Howe Street
Vancouver, BC V6Z 2W9

Email: bfindlater@jmp-legal.com

1305402 Inc.
c/o Brad J. Findlater
James McCall Panunto
300-444, 5th Avenue S.W.
Calgary, AB T2P 2T8

Plaintiffs in Action S-139102

c/o Winston Kam
Remedios & Company
1010-1030 W Georgia Street, Vancouver, BC
V6E 2Y3

mpontin@fasken.com

wkam@remediosandcompany.com

Plaintiffs in Action S-149050

c/o Glen Forrester
 Forrester & Company
 Suite 600, Randall Building
 555 W Georgia St.
 Vancouver, BC V6B 1Z6
gforrester@forresterbarristers.com
bettywu7925@gmail.com
isayml@icloud.com
i_leung@shaw.ca
Bill.h.fong@gmail.com
doublecolourtile@hotmail.com

**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**

c/o Edwin Soon Law Office
 609 – 938 Howe Street
 Vancouver, B.C. V6Z 1N9
e.soon@live.com

Brian and Maria Bottem
 26678 100 Avenue
 Maple Ridge, BC V2W 1S5

D & C Atlantic Investments Inc
**c/o Debbie Wong, in her capacity as a senior
 officer of D & C Atlantic Investments Inc.**
 16863 -58A Avenue
 Surrey, BC V3S8P1
debbie16863@hotmail.com

Ngai Woon Chow
 c/o Lana K.L. Li
 Kornfeld LLP
 1100 One Bentall Centre
 505 Burrard Street, Box 11
 Vancouver, BC V7X 1M5
lli@kornfeldllp.com

**Guang Ming Benediction Ltd.
 Tzong Yow Jacky Hung
 Sharon Woan Rong Lee**

c/o Derek Young
 Gowling WLG
 #2300, 550 Burrard Street
 Vancouver, BC V6C 2B5
Derek.Young@gowlingwlg.com

1342565 Alberta Inc.
**c/o Austin Wong in his capacity as Director
 of 1342565 Alberta Inc.**
 56 – 6747 203 Street
 Langley, BC V2Y 3B5

Ian Richardson
 26678 100 Avenue
 Maple Ridge, BC V2W 1S5

0793751 BC Ltd.
 c/o Its Registered Office
 16863 58A Avenue
 Surrey, BC V3S 8P1

0765306 B.C. Ltd.
 c/o Registered Office
 16863 – 58A Avenue
 Surrey, BC V3S 8P1

0879932 B.C. Ltd.
 c/o Its Registered Office
 16863 58A Avenue
 Surrey, BC V3S 8P1

1376472 Alberta Ltd.
c/o Debbie Wong, in her capacity as a senior officer of 1376472 Alberta Ltd.
 16863 -58A Avenue
 Surrey, BC V3S8P1
debbie16863@hotmail.com

0790333 B.C. Ltd.
 c/o Its Registered Office
 Suite 205, 15240 – 56 Avenue
 Surrey, BC V3S 5K7

1342558 Alberta Inc.
Austin Wong in his capacity as Director of 1342558 Alberta Inc.
 56 – 6747 203 Street
 Langley, BC V2Y 3B5

0745188 B.C. Ltd.
Justin Soo in his capacity as Director of 0745188 B.C. Ltd.
 3311 Barmond Avenue
 Richmond, BC V7E 1A1

0774238 B.C. Ltd.
 c/o Its Registered Office
 16863 58A Avenue
 Surrey, BC V3S 8P1

1192657 Alberta Ltd.
 c/o **Austin Wong in his capacity as Director of 1192657 Alberta Inc.**
 56 – 6747 203 Street
 Langley, BC V2Y 3B5

New City Enterprises Ltd.
 c/o Its Registered Office
 501 – 1195 West Broadway
 Vancouver, BC V6H 3X5

Non-Party, Canadian Imperial Bank of Commerce,
 20069 64 Avenue,
 Langley, BC V2Y 1M9

Non-Party, Toronto-Dominion Bank,
 900 West King Edward,
 Vancouver, BC V5Z 2E2

Non-Party, Gulf & Fraser Fishermen's Credit Union
 500-6456 176 Street, Surrey,
 BC V3S 4G3

2100-3779 Sexsmith Road,
 Richmond, BC V6X 3Z9

Non-Party, HSBC Bank Canada
 681 Main Street,
 Vancouver, BC V6A 2V4

Non-Party, Royal Bank of Canada
 400 Main Street,
 Vancouver, BC V6A 2T5

611 - 650 West 41st Avenue,
 Vancouver, BC V5Z 2M9

2208 West 41st Avenue,
 Vancouver, BC V6M 1Z8

17931 56th Avenue,
 Surrey, BC V3S 1E2

TAKE NOTICE that an application will be made via MS Teams 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 Friday, the 27th day of May, at 9:45 a.m. for the Order set out in Part 1 below.

Part 1: ORDERS SOUGHT

1. Within 30 days of the variation of the Mareva Order originally pronounced on December 2, 2014 in British Columbia Supreme Court Action S-149050 (the “**Mareva Order**”) and release of British Columbia Securities Commission Orders to Freeze Property issued on September 26, 2013 (COR#13/154) and February 3, 2017 (COR#2017/12) (the “**Freeze Orders**”), HSBC Bank Canada, Royal Bank of Canada, Toronto Dominion Bank, Canadian Imperial Bank of Commerce, Gulf & Fraser Fishermen’s Credit Union (the “**Financial Institutions**”) shall remit to the Receiver all money belonging to the Debtors in the accounts listed in Schedule “A” to this application (the “**Accounts**”); and
2. The deadline in paragraph 1 may be extended by consent of the Receiver or further order of this Honourable Court.

Part 2: FACTUAL BASIS

1. Pursuant to a liability decision dated June 16, 2016, and sanctions decision dated February 20, 2017, the British Columbia Securities Commission ordered, among other things that the Debtors disgorge over \$9 million and pay an administrative penalties exceeding \$12 million in relation to a securities fraud perpetrated by those parties.
2. To facilitate an orderly recovery and distribution of funds to investors, on October 3, 2019, the Commission sought and obtained an order appointing MNP Ltd. as the Receiver, without security, of certain assets, undertakings, and property of the Debtors.
3. On August 27, 2021, the Receiver sought and obtained an Amended and Restated Receivership Order (the “**Amended Receivership Order**”).

Status of the Receivership

4. The Receiver has realized on the Debtors’ interests in a number of the assets listed in Schedule “B” of the Amended Receivership Order, including:
 - a. Ms. Wong and Ms. Soo’s interest in net sale proceeds held by Owen Bird Law Corporation in connection with the sale of a property located at 33136 Dewdney Trunk Road, Mission, BC;
 - b. Ms. Wong’s half interest in a property located at 16863 58A Avenue, Surrey, BC;
 - c. Ms. Wong and Ms. Soo’s 3/16th interest in 25141 Dewdney Trunk Road, Maple Ridge, BC; and

d. Ms. Wong and Ms. Soo's interest in proceeds of sale from certain lands located in Rocky View, Alberta.

5. The Receiver is the process of realizing on the remaining assets, including but not limited to the Accounts.

RRSPs of Debbie Wong

6. The Accounts include two RRSP accounts belonging to Ms. Wong, which are exigible in accordance with s. 71.3(e) of the *Court Order Enforcement Act*, R.S.B.C. c. 78 (the "*COEA*").

The Mareva Order and the Freeze Orders

7. The Accounts are presently subject to the Mareva Order and the Freeze Orders.
8. The Receiver has set an application to vary the Mareva Order on May 30, 2022 seeking, among other things, an order that it no longer applies to the Debtors' funds in the Accounts.
9. Upon variation of the Mareva Order, the Receiver will request that the Commission consent to a variation of the Freeze Orders.

Part 3: LEGAL BASIS

1. The Applicant relies on the *COEA*, Amended and Restated Receivership Order, the *Supreme Court Civil Rules*, in particular Rule 13-1(19), and the common law.
2. Paragraph 37 of the Amended and Restated Receivership Order provides that the Receiver may from time to time apply to this Court for advice and directions in the discharge of its powers and duties hereunder.
3. Section 71.3(2) of the *COEA* provides that all property in a registered plan (such as an RRSP) is exempt from any enforcement process.
4. But, s. 71.3(3)(e) of the *COEA* provides that s. 71.3(2) "does **not** apply to an enforcement process arising from an order made under the *Securities Act*" [emphasis added]. The definition of "enforcement process" includes, among other things, "any other remedy or legal process to enforce payment of a debt." This receivership is an enforcement process utilized by the Commission to facilitate the payment of debts, namely the disgorgement orders and administrative penalties issued to the Debtors, which total approximately \$20 million.

Part 4: MATERIAL TO BE RELIED ON

1. The pleadings and processes filed herein;
2. The Amended Receivership Order, pronounced on August 27, 2021;

3. The First Report to the Court, filed on April 12, 2022;
4. Affidavit #6 of Patty Wood, sworn on May 11, 2022; and
5. Such further and other materials as counsel may advise and this Honourable Court may accept.

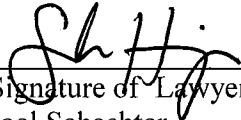
The Applicant estimates that the application will take 10 minutes.

This matter is not within the jurisdiction of a Master.

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 of 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).

Date: May 11, 2022

 for:
 Signature of Lawyer for Applicant
 Joel Schachter

This Notice of Application is filed by Joel Schachter, 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.

SCHEDULE "A"

Financial Institution	Branch Address	Account Number	Account holders
Royal Bank of Canada	400 Main Street, Vancouver	07120-5000914	Debbie Wong
Royal Bank of Canada	400 Main Street, Vancouver, B.C.	07120-5522321	Debbie Wong
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120-5522339	Debbie Wong
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120-5526959	Debbie Wong
HSBC Bank Canada	608 Main Street, Vancouver, BC	5079744 (RRSP)	Debbie Wong
HSBC Bank Canada	608 Main Street, Vancouver, BC	6Y-D6Y9-S (Invest Direct RRSP)	Debbie Wong
Royal Bank of Canada	400 Main Street, Vancouver, BC	044944726 (RESP)	Debbie Wong
Royal Bank of Canada	400 Main Street, Vancouver, BC	884758822 (RESP)	Debbie Wong
CIBC Account No.	20069 64 Avenue, Langley, BC	00720-7588836	Debbie Wong
Royal Bank of Canada	400 Main Street, Vancouver, BC	7120-5524988	Bonnie Soo
Royal Bank of Canada	2208 West 41 st Avenue, Vancouver, BC	06800-5266051	Bonnie Soo
Royal Bank of Canada	17931 56th Avenue, Surrey, BC	01110 7003908 (USD Personal Account)	Bonnie Soo
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120 5522339	Bonnie Soo
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120 5526959	Bonnie Soo
Royal Bank of Canada	400 Main Street, Vancouver, BC	01110 5001185	Bonnie Soo

Royal Bank of Canada	400 Main Street, Vancouver, BC	02880-5164348	Bonnie Soo
Royal Bank of Canada	400 Main Street, Vancouver, BC	07120 5039938	Bonnie Soo
The Toronto-Dominion Bank	900 West King Edward, Vancouver, BC	9466 6326743	Bonnie Soo
The Toronto-Dominion Bank	900 West King Edward Avenue, Vancouver, BC	9466 6332522	Bonnie Soo
G&F Financial Group	500 – 6456 176 th 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 Bank Canada	681 Main Street, Vancouver, BC	080 148271-150	Debbie Wong
HSBC Bank Canada	681 Main Street, Vancouver, BC	080 061990-150	Debbie Wong
HSBC Bank Canada	681 Main Street, Vancouver, BC	080 061990-203	Debbie Wong
HSBC Bank Canada	681 Main Street, Vancouver, BC	320-891178-001	1300302 Alberta Inc.
HSBC Bank 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

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 Master

APPENDIX

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

THIS APPLICATION INVOLVES THE FOLLOWING:

- Other: payment out of funds held in trust

NO. S198522
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 AND OTHERS.
RESPONDENTS

NOTICE OF APPLICATION



Barristers & Solicitors
1600 Cathedral Place
925 West Georgia Street
Vancouver, British Columbia
V6C 3L2

Phone: (604) 685-3456
Attention: Joel Schachter