

This is the 3rd affidavit of Victor Koshkin in this case and was made on December 8, 2021.

No. 52110503
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA
IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*, R.S.C.
1985, c. C-36

AND

IN THE MATTER OF OTSO GOLD CORP. OTSO GOLD OY, OTSO GOLD AB, and
2273265 ALBERTA LTD.

PETITIONERS

AFFIDAVIT

I, Victor Koshkin, care of 2500-700 West Georgia Street, Director, SWEAR THAT:

1. I am a Director of the Petitioner, Otso Gold Corp. ("**Otso Gold**") and as such have personal knowledge of the facts and matters hereinafter deposed to, except where same are stated to be on information and belief, and where so stated I verily believe them to be true.
2. Unless otherwise defined herein, all defined terms have the same meaning as defined in the Petition filed in this proceeding.

Lionsbridge and Westech

3. Attached hereto as Exhibit "A" are the invoices from each and both of Lionsbridge and Westech for June, July, August, September, and November, 2021. Except for the November 2021 account, the Petitioners have paid all these amounts.
4. Attached hereto as Exhibit "B" is a letter from Hein Poulus, Q.C., counsel for Lionsbridge. In response to certain of his assertions therein:
 - (a) The Petitioners have paid for all e-mail and document servers and, to the knowledge of the Petitioners, they were used exclusively by and for the Petitioners. Likewise, any registration in the name of Lionsbridge was as agent for the Petitioners. It is the Petitioners' understanding that all servers are the Petitioners' property, as are any e-mails and documents stored thereon;
 - (b) Likewise, the Petitioners paid for the data room, and Lionsbridge (to the extent it was administering it) was doing so on behalf of the Petitioners, who were using it to solicit investment and financing; and
 - (c) To the Petitioners' knowledge, there were computers and other electronic devices in the offices that the Wessons vacated on or around November 30. The Petitioners

do not have an inventory of the electronic devices used by the Wessons in connection with the Otso Gold Mine, but to the knowledge of the Petitioners, the Petitioners were paying for computers and telephones for each of the Wessons.

5. The documents and e-mail servers are those that store all documents and e-mails of the Otso Group. At present, the Petitioners are not certain that they have access to all their documents as they do not have direct control over their document servers.

6. Further, the data room referenced in the correspondence was a data room prepared in connection with the Brunswick investment in Otso Gold. It contained and contains Otso's confidential information that was provided for review by prospective investors.

Swedish and Finnish Proceedings

7. Attached hereto as Exhibit "C" is a copy of a press release issued by Otso Gold setting out the filings made by its subsidiaries in Sweden and Finland. To my knowledge, the facts set out therein are true.

8. The Petitioners, and in particular Otso Oy, are making it a priority to satisfy the requirement of the Swedish courts that there be a statement by a certified auditor, and intend to deliver such a statement as required by December 31, or, if necessary, to seek a brief extension to do so.

Petitioners' Operations

9. Since the initial order pronounced December 3, 2021 the Petitioners, with assistance from A&M, are continuing to review their financial and operational position and, in particular, the expenses necessary to fund continued gold production through the period of any creditor protection. The Petitioners now have access to approximately one month of actual gold results, and it is apparent that the forecast for revenue that the Otso Gold Mine can realistically generate was too optimistic, in that it over-stated the revenue that the Petitioners could generate and the gold it could produce and may have been conservative with respect to the costs and immediate capital requirements. The Petitioners are working with A&M to revise the gold production and budget forecasts and projections.

10. The Petitioners' currently have cash on hand of €1.6 million. The Petitioners also expect to realize, without significant further expenditure, a further USD\$500,000 from gold sales in the next month. The Petitioners also intend to continue efforts to recover the receivable from MKS described below.

11. Further, the new management for the Petitioners have recently learned that their mine plan is only effective through December 17, 2021. The mine plan is an essential document that sets out how the mine operates, and is required from an operational and a safety perspective. In the absence of a mine plan, the Otso Gold Mine cannot continue to operate and a new mine plan needs to be prepared.

12. Accordingly, the Petitioners expect to temporarily shut down production at the Otso Gold Mine until mid-January in order to revise its production forecasts and budget to reflect the actual

results of the last month, and minimize its expenses during that period. The Petitioners also expect to use this time to develop a further mine plan so that operations and production can restart in the new year.

13. The Petitioners expect that they will have sufficient cash on hand to finance operations through January 14, 2022.

14. Attached hereto as Exhibit “D” is a revised cash flow forecast for the Petitioners through the projected stay period that the Petitioners and A&M have prepared. In particular:

- (a) The Petitioners will be in a position to extract gold and silver up to the intended mine closure date of December 17, which it will realize into revenue in the two weeks thereafter;
- (b) The Petitioners expect to recover the MKS receivable (discussed below) and have made provision for that;
- (c) The Petitioners do not intend to make any of the significant capital or other supply and maintenance payments contemplated in the previous cash flow statement, as they are not necessary to if the mine is not fully operational. The Petitioners intend to fully review and understand those payments to be made, and will make provision for them in their plan for re-opening in January.

Missing MKS Payment

15. In paragraphs 175(d) and (e) of my Affidavit #1 I referenced an expected payment from MKS of approximately US\$741,000 that was missing. Those funds remain missing, and the Petitioners are continuing to investigate this issue.

16. This issue was reported in the Otso Gold board meeting minutes of November 24, 2021 and attached as Exhibit “DDDD” to my first affidavit. The discussions at that meeting and in connection with this issue reflects what the Otso Gold board was told by Brian Wesson.

17. After Mr. Wesson’s abrupt resignation as a director of Otso Gold, the Petitioners (and A&M) engaged with Danske Bank to verify Mr. Wesson’s statements. From these discussions, we have not been able to determine whether Mr. Wesson’s report was accurate.


18. The Petitioners understand that the funds in question may have been refused by the Petitioners’ bank (Danske Bank) and returned to the sending bank (Bank of America). The Bank of America has not confirmed this and the Petitioners still do not know the location of the missing funds. From the Petitioners’ discussions with Danske Bank it is possible that Danske Bank refused funds because of anti money laundering rules, because of an error in a SWIFT code, or some other explanation, and this is something that the Petitioners are still looking into. The Petitioners are particularly concerned that neither of banks can tell them the specific location of the funds, and also that the funds have been missing for so long (i.e. about a month). The Petitioners expect that once the location is confirmed that they will be in a position to better understand exactly why the funds were not delivered.

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19. The Petitioners cannot say with any certainty where the funds are, and are continuing to make efforts to locate them, and determine with certainty why the funds were not received when expected.

20. As I was in Moscow and counsel was in Vancouver, I was not physically present before the commissioner while swearing this affidavit, but was linked with the commissioner utilizing video technology, and we used the process described in B.C. Supreme Court COVID-19 Notice No. 2 dated March 27, 2020.

SWORN BEFORE ME at Vancouver and)
Moscow, British Columbia, on December)
8, 2021)


_____)
A Commissioner for taking Oaths for the)
Province of British Columbia)

Victor Koshkin

TIM LOUMAN-GARDINER
Barrister • Solicitor
FARRIS LLP
2500 - 700 West Georgia Street
P.O. Box 10026, Pacific Centre
Vancouver, BC V7Y 1B3

TY

This is Exhibit "A" to the Affidavit #3 of
Victor Koshkin ^{sworn} affirmed December 8, 2021
before me at the City of Vancouver.



A Commissioner for taking Affidavits in and for
the Province of British Columbia.

From: Koshlin Victor
 To: Brian Weston
 Subject: Invoice for the costs of LB and the Westech Invoice for November, please also find the below supporting information for LB costs.
 Attachments: Invoice for the costs of LB and the Westech Invoice for November, please also find the below supporting information for LB costs.

Just received this
 From: Clyde Weston [mailto:clyde.w@horubridge.com.au]
 Sent: Thursday, December 2, 2021 10:52 PM
 To: Koshlin Victor ; Pascauh Nicolas
 Cc: Brian Weston

Subject: Invoice
 Please find the attached invoice for the costs of LB and the Westech Invoice for November, please also find the below supporting information for LB costs.

Expense Report						
Date	Expense	Amount Paid (AUD)	USD Amount	Statement	Receipt ID	
	AUD					
23-Nov-21	Office Suite Project Plan 3	548.84	386.43	Microsoft Office	DEC4	
20-Nov-21	Virtual Office (Canada)	724.58	521.37	Reput	DEC7	
23-Nov-21	Office Suite E3 Projects	63.80	45.33	Microsoft Office	DEC3	
23-Nov-21	Office Suite Project Plan 5	83.05	60.01	Microsoft Office	DEC5	
23-Nov-21	Webmail & Office Suite Subscription	2953.34	2098.53	Microsoft Office	DEC1	
29-Nov-21	Data Salary	7557.59	5370.20	Data Brutiškina	DEC1	
29-Nov-21	Data Expenses	1221.37	867.86	Data Brutiškina Expenses (Attend Reopening)	DEC12	
04-Nov-21	Phone Bill	995.75	707.55	Telstra	DEC8	FX 2/12/21 10:11am 0.71056107
12-Nov-21	Mining Research & News	116.50	81.85	Absarment Media	DEC9	
09-Nov-21	Online Communications Service	215.53	151.15	Zoom Online Communications	DEC11	
31/11/2021	Virtual Office (Sydney)	432.24	306.99	Serviceop	DEC10	
	Total	14919.50	10,601.37			



Invoice No.: LIONCAP_Otso_0026

Lionsbridge Pty Ltd
 Level 29, Chifley Tower
 2 Chifley Square
 Sydney NSW 2000

ABN: 12 634 874 687

OTSO GOLD CORP. MANAGEMENT

Customer

Name Otso Gold Corp
 Address 300-1055 West Hastings Street
 Vancouver BC V6C 1T2

Date 01-December-2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Expenses Incurred Providing the Services for the month in arrears.	USD	10,601.27
Sub Total			10,601.27
GST			0.00
Total			10,601.27

Payment Details

Lionsbridge Capital Pty Ltd
 SWIFT address: WPACAU2S
 Westpac Bank 275 George Street, Sydney NSW 2000
 Account number: 268-197 USD Payments Only

Terms: On Receipt

Handwritten initials: 24



Invoice No.: WEST_OTSO_0008

Westech International Pty Ltd.
 Level 29, Chifley Tower
 2 Chifley Square
 Sydney NSW 2000

ABN: 24 636 989 289

Customer

Name Otso Gold Oy
 Address: Laivakankaantie 503
 Mattilanperä, Finland

Date 31 November 2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Services and Expenses	USD	10,176.64
2	Services and Expenses	USD	2,378.03
3	Services and Expenses	USD	5,122.69
4	Services and Expenses	USD	9,786.12
5	Services and Expenses	USD	26,571.31
6	Services and Expenses	USD	9,705.75
7	Services and Expenses	USD	7,272.15
8	Services and Expenses	USD	21,174.37
9	Services and Expenses	USD	20,234.72
10	Services and Expenses	USD	6,842.51
Sub Total			119,264.29
GST			0.00
Total			119,264.29

Payment Details

SWIFT address: WPACAU2S **USD Payments Only**
 Account name: Lionsbridge Management Services
 BSB: 034-702
 Account number: 268218

Terms: On Receipt

TY

Laura Ferguson

From: Koshkin Victor <vkoshkin@brunswickrail.com>
Sent: December 2, 2021 10:01 AM
To: Andrey Maruta (andrey.maruta@icloud.com)
Cc: Pascault Nicolas
Subject: FW: Payments
Attachments: Westech August .pdf; Lionsbridge September .pdf

Final – le me know if we need anything else

From: Clyde Wesson [mailto:clayde.w@lionsbridge.com.au]
Sent: Wednesday, September 1, 2021 4:16 PM
To: Koshkin Victor ; Pascault Nicolas ; Brian Wesson
Subject: Payments

Victor,

As discussed I have loaded the following payments up for your approval:

1. Lionsbridge, invoice attached and support below;
2. Westech, invoice attached;
3. Martin Directors Fees and Consultant Fee
4. Yvette Directors Fees
5. \$1 million USD to EUR account at the best available.

I have asked BMO to book a trade If the exchange hits 1.18 flat for \$2 million USD if it doesn't go through today we can reassess tomorrow with Danske and AFEX.

Thanks

Clyde Wesson
 Executive Director



T: +61 (2) 9238 4295
M: +61 403 799 540
E: clayde.w@lionsbridge.com.au
W: lionsbridge.com.au



Invoice No.: WEST_OTSO_0005

Westech International Pty Ltd.
 Level 29, Chifley Tower
 2 Chifley Square
 Sydney NSW 2000

ABN: 24 636 989 289

Customer

Name Otso Gold Oy
 Address: Laivakankaantie 503
 Mattilanperä, Finland

Date 31-August-2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Services and Expenses of	USD	11,019.02
2	Services and Expenses of	USD	11,130.45
3	Services and Expenses of	USD	29,100.19
4	Services and Expenses of,	USD	8,767.64
5	Services and Expenses of,	USD	12,773.05
7	Services and Expenses of,	USD	21,029.98
8	Services and Expenses of	USD	28,853.31
9	Services and Expenses of	USD	15,221.64

Sub Total 137,895.28

GST 0.00

Total 137,895.28**Payment Details**

SWIFT address: WPACAU2S **USD Payments Only**
 Account name: Lionsbridge Management Services
 BSB: 034-702
 Account number: 268218

Terms: On Receipt

T/A



Invoice No.: LIONCAP_Otso_0023

Lionsbridge Pty Ltd
Level 29, Chifley Tower
2 Chifley Square
Sydney NSW 2000

ABN: 12 634 874 687

OTSO GOLD CORP. MANAGEMENT

Customer
 Name Otso Gold Corp
 Address 300-1055 West Hastings Street
 Vancouver BC V6C 1T2

Date 01-September-2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Lionsbridge Management Services as per the Services Agreement for the month in advance	USD	97,000.00
2	Expenses Incurred Providing the Services for the month in arrears.	USD	10,798.37

Sub Total	107,798.37
GST	0.00
Total	107,798.37

Payment Details
 Lionsbridge Pty Ltd
 SWIFT address: WPACAU2S
 Westpac Bank 275 George Street, Sydney NSW 2000
 Account number: 268-197 USD Payments Only

Terms: On Receipt

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Invoice No.: LIONCAP_Otso_0021

Lionsbridge Pty Ltd
 Level 29, Chifley Tower
 2 Chifley Square
 Sydney NSW 2000

ABN: 12 634 874 687

OTSO GOLD CORP. MANAGEMENT

Customer

Name Otso Gold Corp
 Address 300-1055 West Hastings Street
 Vancouver BC V6C 1T2

Date 01-July-2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Lionsbridge Management Services as per the Services Agreement for the month in advance	USD	97,000.00
2	Expenses Incurred Providing the Services for the month in arrears.	USD	11,354.44

Sub Total 108,354.44

GST 0.00

Total 108,354.44

Payment Details

Lionsbridge Capital Pty Ltd
 SWIFT address: WPACAU2S
 Westpac Bank 275 George Street, Sydney NSW 2000
 Account number: 268-197 USD Payments Only

Terms: On Receipt

Tly



Invoice No.: WEST_OTSO_0003

Westech International Pty Ltd.
 Level 29, Chifley Tower
 2 Chifley Square
 Sydney NSW 2000

ABN: 24 636 989 289

Customer
 Name Otso Gold Oy
 Address: Laivakankaantie 503
 Mattilanperä, Finland

Date 30-June-2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Services and Expenses of	USD	8,001.21
2	Services and Expenses of	USD	12,792.88
3	Services and Expenses of	USD	28,377.43
4	Services and Expenses of	USD	18,102.84
5	Services and Expenses of	USD	12,546.24
6	Services and Expenses of	USD	17,069.87
7	Services and Expenses of	USD	16,079.84
Sub Total			112,970.31
GST			0.00
Total			112,970.31

Payment Details
 SWIFT address: WPACAU2S USD Payments Only Terms: On Receipt
 Account name: Lionsbridge Management Services
 BSB: 034-702
 Account number: 268218

Pay

From: Koshin Victor
 To: Brian Wesson
 Subject: Per: LB and Westech
 Date: 2021-08-03 14:47:52

From: Clyde Wesson [mailto:clyde.w@lionsbridge.com.au]
 Sent: Tuesday, August 3, 2021 4:47 PM
 To: Koshin Victor; Pascaut Nicolas; Brian Wesson
 Subject: LB and Westech

Victor,
 Please find attached the LB and Westech invoices, please also find the support for the LB expenses below. I will load these into the system - if you approve please approve the payment otherwise let me know if you have any questions.
 Please note, this is confidential to Corp and not to be sent to site.

Expense Report							
Date	Expenses	Amount Paid (AUD)	USD Amount	Statement	Receipt ID		
	AUD						
27-Jul-21	Webmail and Office Suite	1974.00	1453.76	Microsoft Office	AUG7		
19-Jul-21	Virtual Office (Canada)	721.42	531.29	Repsys	AUG5		
23-Jul-21	Office Suite Projects	458.52	367.14	Microsoft Office	AUG3		
23-Jul-21	Office Suite E3 Subscription	63.00	46.99	Microsoft Office	AUG6		
31-Jul-21	Dace Salary	7429.32	5471.34	Dace Bruttolina	AUG4		
20-Jul-21	Phone Bill	1316.26	869.36	Telstra	AUG8	FX	0.75641181
31-Jul-21	Virtual Office (Australia)	491.12	317.50	Servicecorp	AUG2		
15-Jul-21	Mining Research & News	116.60	85.87	Aspermont Media	AUG1		
22-Jul-21	Online Data Sharing Service	165.00	121.53	Dropbox	AUG11		
12-Jul-21	Online Communications Service	190.85	96.36	Zoom Online Communications	AUG10		
07-Jul-21	Phone Bill	310.05	218.34	Telstra	AUG9		
	Total	13156.94	9,689.45				

Thanks
 Clyde Wesson
 Executive Director



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Invoice No.: WEST_OTSO_0004

Westech International Pty Ltd.
 Level 29, Chifley Tower
 2 Chifley Square
 Sydney NSW 2000

ABN: 24 636 989 289

Customer

Name Otso Gold
 Address: Laivakankaantie 503
 Mattilanperä, Finland

Date 31-July-2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Services and Expenses of	USD	13,750.31
2	Services and Expenses of	USD	19,922.40
3	Services and Expenses of	USD	31,582.05
4	Services and Expenses of	USD	7,934.22
5	Services and Expenses of	USD	7,681.06
7	Services and Expenses of	USD	7,569.98
8	Services and Expenses of	USD	27,841.99
9	Services and Expenses of	USD	24,371.89
Sub Total			140,653.90
GST			0.00
Total			140,653.90

Payment Details

SWIFT address: WPACAU2S **USD Payments Only**
 Account name: Lionsbridge Management Services
 BSB: 034-702
 Account number: 268218

Terms: On Receipt

T4



Invoice No.: LIONCAP_Otso_0022

Lionsbridge Pty Ltd
 Level 29, Chifley Tower
 2 Chifley Square
 Sydney NSW 2000

ABN: 12 634 874 687

OTSO GOLD CORP. MANAGEMENT

Customer

Name Otso Gold Corp
 Address 300-1055 West Hastings Street
 Vancouver BC V6C 1T2

Date 01-August-2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Lionsbridge Management Services as per the Services Agreement for the month in advance	USD	97,000.00
2	Expenses Incurred Providing the Services for the month in arrears.	USD	9,689.45

Sub Total	106,689.45
GST	0.00
Total	106,689.45

Payment Details

Lionsbridge Capital Pty Ltd
 SWIFT address: WPACAU2S
 Westpac Bank 275 George Street, Sydney NSW 2000
 Account number: 268-197 USD Payments Only

Terms: On Receipt

Tly

From: Koshkin Victor
 To: Andrew Manda (andrew.manda@lionsbridge.com)
 Cc: Pascault Nicolas
 Subject: FW: Lb and Westech
 Attachments: Invoice0111.xlsx
 Lionsbridge October.pdf
 Westech October 2021.pdf

From: Clyde Wesson [mailto:clyde.w@lionsbridge.com.au]
 Sent: Monday, October 4, 2021 10:40 AM
 To: Pascault Nicolas ; Koshkin Victor ; Brian Wesson
 Subject: Lb and Westech

Victor,
 Please see the LB and Westech Invoices attached and the breakdown of the expenses claim below.
 I will load these up, in the next hour, along with:
 1. Andrey's invoice – please approve this, we have not asked him to do anything so I cannot approve; and
 2. Yvette and Martins payments for the month.
 If approved please approve on BMO.

Date	Expense	Amount Paid (AUD)	USD Amount	Statement	Receipt ID
23-Sep-21	Office Suite	543.84	394.67	Microsoft Office	OCT3
21-Sep-21	Virtual Office (Canada)	727.72	526.12	Logus	OCT7
23-Sep-21	Office Suite E3 Projects	83.80	46.20	Microsoft Office	OCT11
23-Sep-21	Office Suite Projects	83.05	60.27	Microsoft Office	OCT12
23-Sep-21	Webmail & Office Suite Subscription	2115.60	1535.32	Microsoft Office	OCT3
20-Sep-21	Dace Salary	7485.82	5432.63	Dace Brivskina	OCT8
05-Sep-21	Phone Bill	1288.33	934.66	Telstra	OCT8
10-Sep-21	Mining Research & News	116.60	84.62	Aspermont Media	OCT8
22-Sep-21	Online Data Sharing Service	183.00	119.74	Dropbox	
10-Sep-21	Online Communications Service	192.45	139.66	Zoom Online Communications	
13-Sep-21	Accommodation (Business in Helsinki)	1072.91	776.62	Hotel Kamp Helsinki	OCT9
03-Sep-21	Virtual Office (Sydney)	495.41	359.53	Servicecorp	
	Total	14350.63	10416.43		

Clyde Wesson
 Executive Director



Lionsbridge
 a Newmont Group Company
 T: +61 (2) 9238 4295
 M: +61 403 799 540
 E: clyde.w@lionsbridge.com.au
 W: lionsbridge.com.au

Ty



Invoice No.: LIONCAP_Otso_0024

Lionsbridge Pty Ltd
 Level 29, Chifley Tower
 2 Chifley Square
 Sydney NSW 2000

ABN: 12 634 874 687

OTSO GOLD CORP. MANAGEMENT

Customer

Name Otso Gold Corp
 Address 300-1055 West Hastings Street
 Vancouver BC V6C 1T2

Date 01-October-2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Lionsbridge Management Services as per the Services Agreement for the month in advance	USD	97,000.00
2	Expenses Incurred Providing the Services for the month in arrears.	USD	10,414.43

Sub Total	107,414.43
GST	0.00
Total	107,414.43

Payment Details

Lionsbridge Capital Pty Ltd
 SWIFT address: WPACAU2S
 Westpac Bank 275 George Street, Sydney NSW 2000
 Account number: 268-197 USD Payments Only

Terms: On Receipt

TLU



Invoice No.: WEST_OTSO_0006

Westech International Pty Ltd.
 Level 29, Chifley Tower
 2 Chifley Square
 Sydney NSW 2000

ABN: 24 636 989 289

Customer
 Name Otso Gold Oy
 Address: Laivakankaantie 503
 Mattilanperä, Finland

Date 31/09/2021
 Order Ref. Services Agreement

Ref	Description	Currency	Amount
1	Services and Expenses	USD	11,404.67
2	Services and Expenses	USD	11,532.43
3	Services and Expenses	USD	7,489.68
4	Services and Expenses	USD	9,724.49
5	Services and Expenses	USD	26,570.49
7	Services and Expenses	USD	14,127.36
8	Services and Expenses	USD	10,885.69
9	Services and Expenses	USD	26,894.39
10	Services and Expenses	USD	48,930.80
11	Services and Expenses	USD	15,022.25
12	Services and Expenses	USD	37,508.78
13	Services and Expenses	USD	18,076.65
		Sub Total	238,167.67
		GST	0.00
		Total	238,167.67

Payment Details
 SWIFT address: WPACAU2S **USD Payments Only** Terms: On Receipt
 Account name: Lionsbridge Management Services
 BSB: 034-702
 Account number: 268218

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This is Exhibit "B" to the Affidavit #3 of
Victor Koshkin affirmed December 8, 2021
before me at the City of Vancouver.



A Commissioner for taking Affidavits in and for
the Province of British Columbia.

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Harris & Company LLP
 14th Floor, 550 Burrard Street
 Vancouver, BC
 Canada V6C 2B5

T / 604 684 6633
 F / 604 684 6632
 harrisco.com
 info@harrisco.com

December 3, 2021

Hein Poulus, Q.C.
 D/ 778 328 2548

By EMail

hpoulus@harrisco.com
 Our file 009728.001

Farris LLP
 700 W Georgia St #2500
 Vancouver, BC V7Y 1B3

Attention: Rebecca M. Morse

Dear Ms. Morse:

Re: Otso Gold Corp

Thank you for your letter of 1 December 2021.

I act for Lionsbridge and Westech in connection with the Services Agreement. Communications on that subject should be sent to me.

I will deal separately with your substantive allegations. For the moment I will say only that your instructions as to the history of this dispute are simply incorrect.

This letter is intended to deal with the administrative issues that you have raised and that you characterize as urgent. I have reproduced the numbered points in your letter and italicized them. The responses are in ordinary font.

As a general point, many of your questions assume that Lionsbridge has in its possession files on the operations of Otso. That assumption is incorrect; Otso has a substantial operation on site and maintains books and records there. Much of what you seek is already in your client's possession.

1) Full access, including administrative access and passwords, to the Company's (and, as applicable, its subsidiaries):

a. Web site;

Lionsbridge will be happy to give Otso control of the website. Please identify the Otso employee who will do the work and have him or her contact Clyde Wesson.

b. E-mail and document servers;

The Email servers are Lionsbridge's property. Lionsbridge will be happy to assign the Otso domain names and give Otso an archive of the mailboxes of Otso employees, if desired. Otso will be required to set up its own email hosting. Otso will, of course, have to bear the expense of that work and of maintaining the mailboxes until Otso has created its own. Lionsbridge will provide an estimate, so that the cost can be prepaid.

c. Data room;

Lionsbridge owns the data room. Lionsbridge will be happy, at Otso's expense, to have an archive prepared so that Otso can set up its own data room.

d. Social media accounts; and

Please provide a list of social media accounts of which Otso would like to have control and Lionsbridge will provide access details.

e. Financial accounts, including bank and credit card accounts

The financial accounts are in the possession of Otso personnel on site and in the possession of Otso's consultants.

Otso has control of, and access to, all of its own bank accounts. Otso's directors have had access to and approved expenses from these accounts for some time.

Otso has control of the credit card accounts (they are in its name). Lionsbridge has not used any corporate credit cards since Brian and Clyde Wesson resigned from the board.

f. All intellectual properties including Boyd mining plan, Company's mining plan and block model, drilling results and any other intellectual properties;

So far as our client is aware, all of the intellectual property is in the possession of Otso on site or in the possession of its consultants, including Boyd. Please specify what property is claimed to not be in your client's possession.

2) All computers, mobile phones and other physical properties including their contents

Lionsbridge is aware of having possession of only one item in these categories: a mobile phone. Lionsbridge will arrange to have it sent to the site.

3) All corporate credit cards. We further advise Lionsbridge and its Key Persons that they will be liable for any unauthorized charges incurred on such cards;

Lionsbridge will, at Otso's option, send the cards to the site or destroy them.

- 4) *All credit card statements including supporting documents and underlying invoices that were paid for with the credit cards from January 2021 to November 2021 for CAD 683,704;*

All of the credit card statements are available from the credit card providers and again are in Otso's name. Lionsbridge will be happy, at Otso's expense, to do the work of collecting underlying invoices. Lionsbridge will furnish a cost estimate for the work and will require prepayment.

- 5) *All bank account statements for the Company's accounts ;*

All of this information is available either in Otso's accounting records on site, from the banks in question or from Otso's employees. Again Otso's directors have had access to these bank accounts for approval purposes for some time. Lionsbridge does not maintain files of this information.

- 6) *All accounts payable records. Our client is particularly concerned about (i) an apparent increase in accounts payable of Otso Gold OY (excluding payables owed to Tallqvist) from c.€2 million at the end of July to c.€9 million at the end of November and our client requires the records relating to the accounts payable as a matter of extreme urgency and, the reasons for the increase (particularly in reference to the budget presented to the Board on October 6, 2021); and (ii) copies of all invoices received for Otso Canada pertaining to the period from August 2021 to November 2021, even if they have not yet been paid; and*

Accounts payable records are maintained on site or by Otso personnel. It is unsurprising that the payables have risen, as the Company is currently moving into production and waiting for funds from gold sales.

- 7) *All records relating to the gold sales trade accounts, and specifically any records relating to the payment by MKS of USD\$741,000.*

This information is tracked on site by Otso personnel and should be available from their files or can be sought directly from MKS.

Yours very truly,
Harris & Company LLP

Per:



Hein Poulus, Q.C.
HP/an

This is Exhibit "C" to the Affidavit #3 of
Victor Koshkin ^{Sworn} affirmed December 8, 2021
before me at the City of Vancouver.



A Commissioner for taking Affidavits in and for
the Province of British Columbia.





OTSO GOLD

Toronto, ON, December 08, 2021

Trading Symbol: TSX-V: OTSO

OTSO GOLD OBTAINS LOCAL CREDITOR PROTECTION IN FINLAND AND SWEDEN

Toronto, Ontario – Otso Gold Corp. ("**Otso**" or the "**Company**"), (TSX-V:OTSO) announced today it has obtained orders under applicable insolvency legislation from local authorities in Finland and Sweden with respect to its material subsidiaries.

In Finland, the Company's operating subsidiary Otso Gold Oy, a Finnish limited liability company, was granted a request by the District Court of Oulu for interim interdictions under the Finnish Restructuring Act relating to Otso Gold Oy's restructuring application. The stay, which prohibits the repayment as well as the collection and enforcement, whether by legal means or otherwise, of existing debts and the enforcement of any securities provided by the company, is effective immediately. The court has initially granted Otso Gold Oy until December 31, 2021 to supplement its application with certain additional required materials. In addition, in Sweden, the District Court of Södertörn (Department 4) resolved to open a restructuring proceeding regarding Otso Gold AB and appointed a local administrator. A creditors' meeting will be held on December 22, 2021 at the District Court of Södertörn. The Swedish restructuring proceedings will cease on March, 7 2022 if an extension request is not filed prior to that date.

As previously disclosed on December 3, 2021, after careful consideration of all available alternatives following thorough consultation with its legal and financial advisors, the Board of Directors of the Company determined that it was in the best interests of the Company and all of its stakeholders to make each of the foregoing local applications for creditor protection and to seek the order given on December 3, 2021 by the Supreme Court of British Columbia (the "**Court**") granting protection from creditors under the *Companies' Creditors Arrangement Act* (Canada) ("**CCAA**") to enable the Company to propose a plan of arrangement to its creditors. A copy of the Initial Order and other information is available on the Monitor's website at www.insolvencies.deloitte.ca/en-ca/otsogoldcorp.

Trading in the common shares of the Company on the TSX Venture Exchange (the "**TSXV**") remains halted and it is anticipated that the trading thereof will continue to be halted until a review is undertaken by the TSXV regarding the suitability of the Company for listing on the TSXV. Should the common shares be delisted following such review by the TSXV, the Company may apply for listing of the common shares on the NEX Board of the TSXV or relisting on the TSXV upon exiting the CCAA process, as the case may be. In addition, the Company anticipates that, as a result of the Company's filing for protection

under the CCAA and its potential delisting by the TSXV, provincial securities regulators in Canada may issue a cease trade order to prevent any trading in the common shares in Canada.

Further news releases will be provided on an ongoing basis throughout the CCAA process as required by law or otherwise as may be determined necessary by the Company or the Court.

For further information, please contact:

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Chief Restructuring Officer
+44 (0) 207 715 5200

For media inquiries, please contact:

Jerome Hasler
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www.otsogold.com

Forward-looking Statements

This press release contains forward-looking statements regarding the Company based on current expectations and assumptions of management, which involve known and unknown risks and uncertainties associated with our business and the economic environment in which the business operates. All such statements are forward-looking statements under applicable Canadian securities legislation, and any other applicable law or regulation of any other jurisdiction. Any statements contained herein that are not statements of historical facts, including statements regarding our future results of operations or financial condition, business strategy and plans and objectives for future operations, may be deemed to be forward-looking statements. Specific forward-looking statements in this press release include, but are not limited to: statements with respect to: (i) the outcome of the CCAA proceedings, local insolvency proceedings in Sweden and Finland and/or any related restructuring proceedings and the timing of any such proceedings, (ii) the ability of the Corporation to secure additional financing as part of the CCAA process, local insolvency proceedings in Sweden and Finland or otherwise, and (iii) the halt of trading of the common shares and review of the TSXV regarding the suitability of the Corporation for listing on the TSXV and any outcome of such review. By their nature, forward-looking statements require us to make assumptions and are subject to inherent risks and uncertainties. You should not rely on forward-looking statements as predictions of future events. We caution our readers of this press release not to place undue reliance on our forward-looking statements as a number of factors could cause actual results or conditions to differ materially from current expectations. The results, events and circumstances reflected in the forward-looking statements may not be achieved or occur, and actual results, events or circumstances could differ materially from those described in the forward-looking statements. Please refer to the risks set forth

in the Company's continuous disclosure documents that can be found on SEDAR (www.sedar.com) under the Company's issuer profile. New risks and uncertainties emerge from time to time, and it is not possible for us to predict all risks and uncertainties that could have an impact on the forward-looking statements contained in this press release. In addition, there is no assurance that there will be any residual value for shareholders under the CCAA process, nor can be no assurance that the CCAA proceedings will result in the maximization of the return in respect of the Corporation's assets and those of its subsidiaries. The Company does not intend, and disclaims any obligation, except as required by law, to update or revise any forward-looking statements whether as a result of new information, future events or otherwise.

About the Company

Otso Gold Corp. wholly owns the Otso Gold Mine near the Town of Raahel in Finland. The Otso Gold Mine is developed, fully permitted, has all infrastructure in place, two open pits and is currently in the ramp-up towards commercial production at name plate capacity of 2 million tonnes per annum.

Neither the TSX Venture Exchange nor its Regulation Services Provider (as that term is defined in the policies of the TSX Venture Exchange) accepts responsibility for the adequacy or accuracy of this release.

This is Exhibit "D" to the Affidavit #3 of
Victor Koshkin ^{sworn} affirmed December 3, 2021
before me at the City of Vancouver.



A Commissioner for taking Affidavits in and for
the Province of British Columbia.

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OTSO GOLD OY
For the period ending December 31, 2022
(Unaudited, CAD\$)

Month Ended	10-Dec-21	17-Dec-21	24-Dec-21	31-Dec-21	7-Jan-22	14-Jan-22	Total
	week Projected	week Projected	week Projected	week Projected	week Projected	week Projected	Projected
Revenue							
gold	962,861	-	641,026	-	-	-	1,603,887
MKS debt recovered	-	-	-	-	951,117	-	951,117
silver	-	-	-	-	-	-	-
Total Revenue	962,861	-	641,026	-	951,117	-	2,555,003
Payments							
Mining costs	(741,738)	(118,952)	-	(118,952)	-	(118,952)	(1,098,594)
Processing costs	(170,762)	(177,271)	-	(177,271)	-	(177,271)	(702,575)
Site indirect costs	(23,132)	(23,132)	(23,132)	(23,132)	(11,723)	(11,723)	(115,975)
Safety	(45,012)	(45,012)	(45,012)	(45,012)	(57,145)	(57,145)	(294,338)
Environmental	(67,034)	(67,034)	(67,034)	(67,034)	(63,609)	(63,609)	(395,353)
G&A costs	(111,553)	(111,553)	(111,553)	(111,553)	(113,726)	(113,726)	(673,666)
Land tenure costs	-	-	-	(2,406)	-	-	(2,406)
Royalties payable	-	-	-	-	-	-	-
Income tax	-	-	-	-	-	-	-
Change in working capital	-	-	-	-	-	-	-
Tailing and PAF capex	-	-	-	-	-	-	-
Sustaining capex	-	-	-	-	-	-	-
Environmental bonds	-	-	-	-	-	-	-
Total Payments	(1,159,231)	(542,954)	(246,731)	(545,359)	(246,204)	(542,426)	(3,282,906)
Net Cash Flow From Operation	(196,370)	(542,954)	394,295	(545,359)	704,913	(542,426)	(727,902)
Restructuring costs	(25,353)	(196,301)	(135,455)	(41,192)	(157,077)	(189,529)	(744,907)
Interest due on loan							
Interest payments	-	-	-	-	-	-	-
Repayment of capitalized interest	-	-	-	-	-	-	-
Total interest payments	-	-	-	-	-	-	-
Net Cash Flow	(221,723)	(739,255)	258,840	(586,551)	547,836	(731,955)	(1,472,809)
Opening Cash balance	1,656,698	#####	695,720	954,560	368,008	915,844	1,656,698
Net Cash Flow	(221,723)	(739,255)	258,840	(586,551)	547,836	(731,955)	(1,472,809)
Closing Cash balance	1,434,975	695,720	954,560	368,008	915,844	183,889	183,889
Cash deficit	-	-	-	-	-	-	-

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OTSO GOLD
For the period ending January 14, 2022
(Unaudited, EUR\$)

Month Ended	10-Dec-21	17-Dec-21	24-Dec-21	31-Dec-21	7-Jan-22	14-Jan-22	Total
	week Projected	week Projected	week Projected	week Projected	week Projected	week Projected	Projected
Revenue							
gold	664,630	-	442,478	-	-	-	1,107,108
MKS debt recovered	-	-	-	-	656,523	-	656,523
silver	-	-	-	-	-	-	-
Total Revenue	664,630	-	442,478	-	656,523	-	1,763,631
Payments							
Mining costs	(511,996)	(82,108)	-	(82,108)	-	(82,108)	(758,321)
Processing costs	(117,871)	(122,364)	-	(122,364)	-	(122,364)	(484,963)
Site indirect costs	(15,967)	(15,967)	(15,967)	(15,967)	(8,092)	(8,092)	(80,054)
Safety	(31,070)	(31,070)	(31,070)	(31,070)	(39,445)	(39,445)	(203,172)
Environmental	(46,271)	(46,271)	(46,271)	(46,271)	(43,907)	(43,907)	(272,898)
G&A costs	(77,001)	(77,001)	(77,001)	(77,001)	(78,501)	(78,501)	(465,008)
Land tenure costs	-	-	-	(1,661)	-	-	(1,661)
Royalties payable	-	-	-	-	-	-	-
Income tax	-	-	-	-	-	-	-
Change in working capital	-	-	-	-	-	-	-
Tailing and PAF capex	-	-	-	-	-	-	-
Sustaining capex	-	-	-	-	-	-	-
Environmental bonds	-	-	-	-	-	-	-
Total Payments	(800,177)	(374,782)	(170,310)	(376,443)	(169,946)	(374,418)	(2,266,076)
Net Cash Flow From Operations	(135,548)	(374,782)	272,168	(376,443)	486,577	(374,418)	(502,446)
Restructuring costs	(17,500)	(135,500)	(93,500)	(28,433)	(108,425)	(130,825)	(514,183)
Interest due on loan							
Interest payments	-	-	-	-	-	-	-
Repayment of capitalized interest	-	-	-	-	-	-	-
Total interest payments	-	-	-	-	-	-	-
Net Cash Flow	(153,048)	(510,282)	178,668	(404,876)	378,152	(505,243)	(1,016,629)
Opening Cash balance	1,161,442	1,008,394	498,112	676,780	271,904	650,056	1,161,442
Net Cash Flow	(153,048)	(510,282)	178,668	(404,876)	378,152	(505,243)	(1,016,629)
Closing Cash balance	1,008,394	498,112	676,780	271,904	650,056	144,812	144,812
Cash deficit	-	-	-	-	-	-	-

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