

COURT FILE NUMBER: 1501-00955

COURT: COURT OF QUEEN'S BENCH OF ALBERTA

JUDICIAL CENTRE: CALGARY

APPLICANTS: LUTHERAN CHURCH – CANADA, THE ALBERTA – BRITISH COLUMBIA DISTRICT, ENCHARIS COMMUNITY HOUSING AND SERVICES, ENCHARIS MANAGEMENT AND SUPPORT SERVICES, AND LUTHERAN CHURCH – CANADA, THE ALBERTA – BRITISH COLUMBIA DISTRICT INVESTMENTS LTD.

DOCUMENT: AFFIDAVIT

ADDRESS FOR SERVICE Sugden, McFee & Roos LLP
AND CONTACT Barristers & Solicitors
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Attention: Errin A. Poyner

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File No. K-5820(1)

AFFIDAVIT OF ELVIRA KROEGER

Sworn on February 23, 2016

I, ELVIRA KROEGER, of Delta, British Columbia, SWEAR AND SAY THAT:

1. I am a depositor to both the Lutheran Church – Alberta British Columbia District's ("ABC District") Church Extension Fund and the Lutheran Church – Alberta British Columbia District Investments Ltd. ("DIL") and as such have personal knowledge of the facts and matters hereinafter deposed to, except where stated to be based on information and belief and where so stated I verily believe the same to be true.
2. I am 87 years old. I am the widow of Ernst Kroeger, a pastor of the Lutheran Church. I have been a member of the congregation of St. Luke Lutheran Church in Surrey, British

Columbia, since 1987.

3. Through my membership in the St. Luke congregation, I was introduced to the ABC District's Church Extension program and decided to deposit my savings in the CEF and in DIL.
4. As of December 31, 2013 my CEF account balances were as follows:
 - a. \$11,608.83 at 3.0% maturing to \$13,065.84 on July 1, 2017;
 - b. \$11,759.33 at 2.25% maturing to \$12,023.91 on January 26, 2014
5. As of December 31, 2013, my Registered Retirement Income Fund (RRIF) balance with DIL was \$9,348.79 and my Tax Free Savings Account (TFSA) balance with DIL was \$5,404.89.
6. In or about March 2014, I renewed a CEF term deposit investment. At that time I received no warning from the management or other representatives of ABC District that it had in any prior period suffered losses on its mortgages, loans and other investments made with my savings, or that my investments were otherwise at risk.
7. In or about May 2014, I was advised by Candace Rivet of the ABC District that it would renew a second term deposit held in my name for another five years.
8. On or about January 9, 2015, I was advised by the ABC District that it had placed a moratorium on withdrawals from and deposits to the CEF.
9. In or about January 2015, I was advised by DIL that payments and transfers from my RRIF and TFSA accounts in the DIL had also been halted and that the value of my investment had been "impaired" by approximately 24%.
10. In or about February 2015 I was advised by DIL that, as of January 1, 2015, my \$9,348.79 RRIF deposit had an "Estimated Write Down Balance" of only \$6,579.78.

11. I make this affidavit in opposition to the application of the Applicant for judicial sanction of the Amended Amended Plan of Arrangement and Compromise of Lutheran Church – Canada, the Alberta and British Columbia District Investments Ltd. dated January 11, 2016.

SWORN BEFORE ME at the)
City of Vancouver, in the)
Province of British Columbia, this)
23rd day of February, 2016.)


ELVIRA KROEGER

~~_____~~)
Errin A. Poyner)
A Commissioner for taking)
Affidavits within the Province of)
British Columbia.)

ERRIN A. POYNER
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