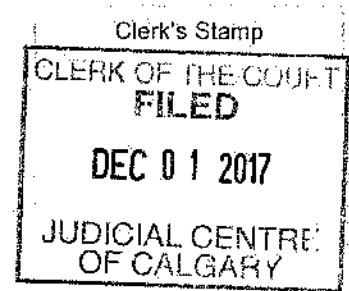


COURT FILE NUMBER 1501-00955
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY



IN THE MATTER OF THE COMPANIES'
CREDITORS ARRANGEMENT ACT, R.S.C.
1985, C. c-36 as amended

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.

APPLICANT DISTRICT SUBCOMMITTEE

RESPONDENTS THE APPLICANTS IN THESE CCAA
PROCEEDINGS AND ALL DEFENDANTS IN
THE DISTRICT REPRESENTATIVE ACTIONS
NUMBERED: 1603-03142 (ALBERTA QB),
S1611798 (BC SC), S1611966 (BC SC), 1603-
22816 (ALBERTA QB).

DOCUMENT AFFIDAVIT of ERINN WILSON

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS DOCUMENT HIGGERTY LAW
Attention: Clint Docken
Suite 101 440 2nd Ave SW
Calgary, Alberta T2P 5E9
Phone: 4035038888
Fax: 5873162260

AFFIDAVIT OF ERINN WILSON

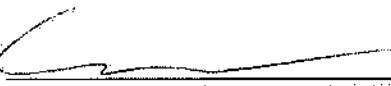
Sworn on December 1st, 2017

I, Erinn Wilson, of Calgary, Alberta, SWEAR AND SAY THAT:

1. I work as a legal assistant for Mr. Clint Docken, Q.C. and as such have personal knowledge of the matters hereinafter deposed except where stated to be based upon information in which case I believe the same to be true.
2. Attached hereto and marked as Exhibit "A" to this Affidavit is the procedure card for Alberta Action Number 1603-03142.

3. Attached hereto and marked as Exhibit "B" to this Affidavit is the procedure card for Alberta Action Number 1603-22816.
4. Attached hereto and marked as Exhibit "C" to this Affidavit is the procedure card for BC Action Number S1611798.
5. Attached hereto and marked as Exhibit "D" to this Affidavit is the procedure card for BC Action Number S1611966.
6. I am advised by Mr. Docken and the District Subcommittee that Glen Mitchell qualifies as a Representative Plaintiff for the Alberta District Class Action under the Plan as amended in these proceedings (the "Plan"). Attached hereto and marked as Exhibit "E" to this Affidavit is a true copy of Glen Mitchell's form submission to our office outlining his qualifications.
7. I am advised by Mr. Docken and the District Subcommittee that Wiley Hertlein qualifies as a Representative Plaintiff for the Alberta District Class Action under the Plan. Attached hereto and marked as Exhibit "F" to this Affidavit is a true copy of Wiley Hertlein's form submission to our office outlining his qualifications.
8. I am advised by Mr. Docken and the District Subcommittee that Willy Berger qualifies as a Representative Plaintiff for the B.C. District Class Action under the Plan. Attached hereto and marked as Exhibit "G" to this Affidavit is a true copy of Willy Berger's form submission to our office outlining his qualifications.
9. I have been advised by Mr. Docken that Bill Mulder will remain as a Representative Plaintiff in the BC District Class Action S1611798.
10. I swear this Affidavit in support of the District Subcommittee's Application for Advice, Directions, Declarations and Orders.

SWORN BEFORE ME at Calgary, Alberta, this 1 day of December, 2017.



(Commissioner for Oaths in and for the Province of Alberta)

Sumeet Sandhu
Student-at-Law, Notary Public &
Commissioner for Oaths
in and for Alberta



Erin Wilson

EDMONTON
PROCEDURE RECORD PRINT

CASES R00033
CLERK OF THE COURT - COUNTER

ACTION NO: Q1603 03142

ACTIVITY DESCRIPTION	LITIGANTS HEARING DATE & TYPE	AMOUNT RESULT	EXPLANATION APPLICATION	JUSTICE/MASTER	DATE FILED	LAW FIRM
STATEMENT OF CLAIM ORDE CONT	EIFERT, PAUL HEUMANN, HANS MCMASTER, GRANT WERSCHLER, JAMES SCHOEFF, DAVID ENCHARIS COMMUNITY HOUSI				16DEC2016	AGP
ST. OF CLAIM - ACCOUNTI CONT					16DEC2016	AGP
STATEMENT CLAIM - DAMAG AMNDPRINCE OF PEACE LUTHERAN			#2:ADD DEF/RMD BODY		23DEC2016	AGP
STATEMENT OF CLAIM ORDE CONT					23DEC2016	AGP
ST. OF CLAIM - ACCOUNTI CONT					23DEC2016	AGP
STATEMENT CLAIM - DAMAG AMND			#3:AMD BODY/REMEDY		13FEB2017	AGP
STATEMENT OF CLAIM ORDE CONT					13FEB2017	AGP
ST. OF CLAIM - ACCOUNTI CONT					13FEB2017	AGP
NOTICE W/DRAW AS LAWYER	SHERMAN, SHARON SHERMAN, SHARON; PER. RE SHERMAN, RUBY; BY PER. R BEINERT, GEORG				25MAY2017	AGP

THIS IS EXHIBIT - A
referred to in the Affidavit of
Finn Wilson
Sworn before me this
day of Dec A D 20 17
A Commissioner for Oaths in and for Alberta

Sumeet Sandhu
Student-at-Law, Notary Public &
Commissioner for Oaths
in and for Alberta

*** END OF ACTIVITIES ***
*****END OF REPORT*****

EDMONTON PROCEDURE RECORD PRINT

CASES R00033 CLERK OF THE COURT - COUNTER

ACTION NO: Q1603 03142

ACTIVITY DESCRIPTION	LITIGANTS HEARING DATE & TYPE	AMOUNT RESULT	EXPLANATION APPLICATION	JUSTICE/MASTER	DATE FILED	LAW FIRM
	HABERSTOCK, CLIFF GABERT, GENE LUTZ, RICHARD SCHICK, DAVID WILLISKO, CINDY BECKER, DARYL HELDE, RANDY SANDER, MARK BURNS, JUDITH PLITT, NARJ STEINKE, GERRY KRUSE, KEITH STROUP, FORREST HABERSTOCK, KEITH KUHN, MELANIE DRESSLER, DAVID WASHEIM, PHILIP GIESE, GREG LUNDERBY, WAYNE GILLINGHAM, MICHAEL TUFTS, CRAIG BUCK, RHONDA ESPERANZA, VIC GERGENS, LYNN WEIST, DELOYCE RUF, JANICE RIVET, CANDACE HENNIG, DARLA ROBINSON, KURT ULMER, TED BODE, DAVID KUBKE, ROLAND MORGAN, BILL MUELLER, JOHN SCHAEFFER, GLENN MUTSCHLER, MARVIN GRANDE, STEVEN					

EDMONTON

R00033

PROCEDURE RECORD PRINT

CASES RQ0033 CLERK OF THE COURT - COUNTER

ACTIVITY DESCRIPTION	LITIGANTS HEARING DATE & TYPE	AMOUNT RESULT	EXPLANATION APPLICATION	DATE FILED	LAW FIRM
STATEMENT CLAIM - DAMAGES			NO AMOUNT	22FEB2016	AG
STATEMENT OF CLAIM ORDE CONT				22FEB2016	AG
ST. OF CLAIM - ACCOUNTI CONT				22FEB2016	AG
STATEMENT CLAIM - DAMAG AMNDSHERMAN, SHARON; PER. RE SHERMAN, RUBY; BY PER. R BEINERT, GEORG SCHIEMANN, DONALD KENTEL, JIM NEX, WILLIAM RUF, HAROLD RUF, MARK SCHMIDT, HAROLD SCHUELKE, JAMES BEIDERWEIDEN, MARK HABERSTOCK, HAROLD HEINBUCH, JAMES				16DEC2016	AGP

MORGAN, BILL
 MUELLER, JOHN
 SCHAEFFER, GLENN
 MUTSCHLER, MARVIN
 GRANDE, STEVEN
 EIFERT, PAUL
 HEUMANN, HANS
 MCMASTER, GRANT
 WERSCHLER, JAMES
 SCHOEPP, DAVID
 ENCHARIS COMMUNITY HOUSI
 PRINCE OF PEACE LUTHERAN
 LUTHERAN CHURCH-CANADA
 LUTHERAN CHURCH-CANADA F
 LUTHERAN CHURCH-CANADA,
 TAMAN, FRANCIS
 BISHOP & MCKENZIE LLP
 CHOWNE, RONALD
 PROWSE CHOWNE LLP
 SHEPHERD'S VILLAGE MINIS

#1:ADD PLTS/DEFS/AMD BO

CASES RQ0033

EDMONTON

06/11/2017 10:16:16 PAGE 0001

CLERK OF THE COURT - COUNTER

PROCEDURE RECORD PRINT

ACTION NO: Q1603 03142

SHERMAN, SHARON
SHERMAN, SHARON; PER. RE
SHERMAN, RUBY; BY PER. R
BEINERT, GEORG

305,10011 117 ST,EDM AB
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305,10011 117 ST,EDM AB
BOX 1616 FAIRVIEW AB TOH

VS SCHIEMANN, DONALD
KENTEL, JIM
NEY, WILLIAM
RUF, HAROLD
RUF, MARK
SCHMIDT, HAROLD
SCHUELKE, JAMES
BEIDERWEIDEN, MARK
HABERSTOCK, HAROLD
HEINBUCH, JAMES
HABERSTOCK, CLIFF
GABERT, GENE
LUTZ, RICHARD
SCHICK, DAVID
WILLISKO, CINDY
BECKER, DARYL
HEIDE, RANDY
SANDER, MARK
BURNS, JUDITH
PLITT, MARJ
STEINKE, GERRY
KRUSE, KEITH
STROUP, FORREST
HABERSTOCK, KEITH
KUHN, MELANIE
DRESSLER, DAVID
WASHEIM, PHILIP
GIESE, GREG
LUNDERBY, WAYNE
GILLINGHAM, MICHAEL
TUFTS, CRAIG
BUCK, RHONDA
ESPERANZA, VIC
GERGENS, LYNN
WEIST, DELOYCE
RUF, JANICE
RIVET, CANDACE
HENNIG, DARLA
ROBINSON, KURT
ULMER, TED
BODE, DAVID
KUEKE, ROLAND

02/11/2017 12:26:41 PAGE 0001

EDMONTON PROCEDURE RECORD PRINT

CASES RQ0033 CLERK OF THE COURT - COUNTER

ACTION NO: Q1603 22816 LUTHERAN CHURCH-CANADA, ALLAN GARBER VS DELOITTE LLP/DELOITTE S. ROLFE, BENSON LLP

ACTIVITY DESCRIPTION	LITIGANTS HEARING DATE & TYPE	AMOUNT RESULT	EXPLANATION APPLICATION	JUSTICE/MASTER	DATE FILED	LAW FIRM
STATEMENT CLAIM - DAMAGES			NO AMOUNT		23DEC2016	AGP

*** END OF ACTIVITIES ***
*****END OF REPORT*****

THIS IS EXHIBIT - B
 referred to in the Affidavit of
Emma Wilson
 Sworn before me this 1
 day of Dec A.D. 2017
 A Commissioner for Oaths in and for Alberta

Sumeet Sandhu
 Student-at-Law, Notary Public &
 Commissioner for Oaths
 in and for Alberta



Court Services Online

File Summary Report

Date / Time: 06NOV2017 08:29 AM

Requested by: ANONYMOUS - Anonymous User

File Number: VLC-S-S-1611798

Your Cross Reference Number:

General File Details

Date File Opened: 21DEC2016

Style of Cause: MULDER, William v SCHIEMANN, Donald

Location: Vancouver Law Courts

Level of Court: Supreme

Class of Court: Supreme Civil (General)

Initiating Documents: Notice of Civil Claim

Parties on File

Seq. #	Date Entered	Party Name	Party Role	Counsel Name	Also Known as Names / Other Legal Representatives
1	21DEC2016	BECKER, Daryl	Defendant		
2	21DEC2016	BEIDERWEIDEN, Mark	Defendant		
3	21DEC2016	BISHOP MCKENZIE LLP	Defendant		
4	21DEC2016	BODE, David	Defendant		
5	21DEC2016	BUCK, Rhonda	Defendant		
6	21DEC2016	BURNS, Judith	Defendant		
7	21DEC2016	CHOWNE, Ronald	Defendant		
8	21DEC2016	DRESSLER, David	Defendant		
9	21DEC2016	EIFERT, Paul	Defendant		
10	21DEC2016	ENCHARIS COMMUNITY	Defendant		
11	21DEC2016	ESPERANZA, Vic	Defendant		
12	21DEC2016	ESTATE OF FREDERICK	Plaintiff	GARBER, AA	
13	21DEC2016	GABERT, Gene	Defendant		
14	21DEC2016	GERGENS, Lynn	Defendant		

THIS IS EXHIBIT ^C
referred to in the Affidavit of
Enn Wilson
Sworn before me this
day of Dec. A.D. 2017
A Commissioner for Oaths in and for Alberta

Sumeet Sandhu
Student-at-Law, Notary Public &
Commissioner for Oaths
in and for Alberta

Executor WILSON, Diana

Seq. #	Date Entered	Party Name	Party Role	Counsel Name
15	21DEC2016	GIESE, Greg	Defendant	
16	21DEC2016	GILLINGHAM, Michael	Defendant	
17	21DEC2016	GRANDE, Steven	Defendant	
18	21DEC2016	HABERSTOCK, Cliff	Defendant	
19	21DEC2016	HABERSTOCK, Harold	Defendant	
20	21DEC2016	HABERSTOCK, Keith	Defendant	
21	21DEC2016	HEIDE, Randy	Defendant	
22	21DEC2016	HEINGUCH, James	Defendant	
23	21DEC2016	HENNIG, Daria	Defendant	
24	21DEC2016	HEUMANN, Hans	Defendant	
25	21DEC2016	KENTEL, Jim	Defendant	
26	21DEC2016	KRUSE, Keith	Defendant	
27	21DEC2016	KUBKE, Roland	Defendant	
28	21DEC2016	KUHN, Melanie	Defendant	
29	21DEC2016	LUNDERBY, Wayne	Defendant	
30	21DEC2016	LUTHERAN CHURCH - C	Defendant	
31	21DEC2016	LUTHERAN CHURCH - C	Defendant	
32	21DEC2016	LUTHERAN CHURCH - C	Defendant	
33	21DEC2016	LUTZ, Richard	Defendant	
34	21DEC2016	MCMASTER, Grant	Defendant	
35	21DEC2016	MORGAN, Bill	Defendant	
36	21DEC2016	MUELLER, John	Defendant	
37	21DEC2016	MULDER, William	Plaintiff	GARBER, AA
38	21DEC2016	MUTSCHLER, Marvin	Defendant	
39	21DEC2016	PLITT, Marj	Defendant	
40	21DEC2016	PRINCE OF PEACE LUTH	Defendant	
41	21DEC2016	PROMSE CHOWNE LLP	Defendant	
42	21DEC2016	RIVET, Candice	Defendant	
43	21DEC2016	ROBINSON, Kurt	Defendant	
44	21DEC2016	RUF, Harold	Defendant	

Seq. #	Date Entered	Party Name	Party Role
45	21DEC2016	RUF, Janice	Defendant
46	21DEC2016	RUF, Mark	Defendant
47	21DEC2016	SANDER, Mark	Defendant
48	21DEC2016	SCHAEFFER, Glen	Defendant
49	21DEC2016	SCHICK, David	Defendant
50	21DEC2016	SCHIEMANN, Donald	Defendant
51	21DEC2016	SCHMIDT, Harold	Defendant
52	21DEC2016	SCHOEPP, David	Defendant
53	21DEC2016	SCHUELKE, James	Defendant
54	21DEC2016	SHEPHERD'S VILLAGE M	Defendant
55	21DEC2016	STEINKE, Gerry	Defendant
56	21DEC2016	STROUP, Forrest	Defendant
57	21DEC2016	TAMAN, Francis	Defendant
58	21DEC2016	TUFTS, Craig	Defendant
59	21DEC2016	ULMER, Ted	Defendant
60	21DEC2016	WASHEIM, Philip	Defendant
61	21DEC2016	WEIST, Dejoyce	Defendant
62	21DEC2016	WERSCHLER, James	Defendant
63	21DEC2016	WILLISKO, Cindy	Defendant

Documents Filed

Seq. #	Date Entered	Document Description	Initiating Document?	Amended Document?	Claim Amount	Filing Parties
1	21DEC2016	Notice of Civil Claim	Yes	No		(Plaintiff) ESTATE OF FREDERICK VOIGHT (Plaintiff) MULDER, William

Hearing and Results

Transfers

AVAILABLE INFORMATION
Court Services Online (CSO) provides access to the following court record information:

Civil court information - Supreme and Provincial Court
Court record information on civil Provincial and Supreme Court activity throughout the province with the exception of family proceedings in Provincial Court.

Court information - Court of Appeal
Court record information on civil and criminal Court of Appeal activity for appeals filed after 1 January 2004.

Disclaimer

The court record information available through CSO is not the official court record. For confirmation of information contact the specific court registry.

The data is provided "as is", without warranty of any kind, either express or implied. The Province does not warrant the accuracy or the completeness of the data, nor that CSO will function without error, failure or interruption. Users of CSO acknowledge that some data may suffer from inaccuracies, errors or omissions. Users of CSO rely on the data at their own risk.

Every effort is made to ensure that the court record information is or remains consistent with statutory and court-ordered publication and disclosure bans. However the posting of court record information on this site in no way is a representation, express or implied, that the information conforms with publication and disclosure bans. As bans may be granted at any stage in the proceeding, the court record information will not include details of a ban granted in court on that day. It is the responsibility of persons using or relying on the court record information to personally check with the applicable court clerk or registry for bans and ensure that they comply with any bans on publication or disclosure.

Publication or disclosure of information contrary to a court-ordered ban may result in legal action, including prosecution.

LIMITATION OF LIABILITIES:

No action may be brought by any person against the Province for any loss or damage of any kind caused by any reason or purpose including, without limitation, reliance on the completeness of the data or the functioning of CSO.

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Any other use of CSO or court record information available through CSO is expressly prohibited. Persons found misusing this privilege will lose access to CSO and may be subject to legal action, including prosecution.

File Summary Report



Court Services Online

File Summary Report

Requested by: ANONYMOUS - Anonymous User
 File Number: VLC-S-S-1611966
 Your Cross Reference Number:

Date / Time: 06NOV2017 08:23 AM

General File Details

Date File Opened: 28DEC2016
 Style of Cause: LUTHERAN CHURCH- CANADA, THE ALBERTA-BRITISH COLUMBIA DISTRICT v DELOITTE
 Location: Vancouver Law Courts
 Level of Court: Supreme
 Class of Court: Supreme Civil (General)
 Initiating Documents: Notice of Civil Claim

Parties on File

Seq. #	Date Entered	Party Name	Party Role	Counsel Name	Also Known as Names / Other Legal Representatives
1	28DEC2016	DELOITTE LLP/ DELOITTE	Defendant		
2	28DEC2016	LUTHERAN CHURCH- CA	Plaintiff	GARBER, A	
3	28DEC2016	ROLFE, BENSON LLP	Defendant		
4	28DEC2016	ROLFE, Benson	Defendant		

Documents Filed

Seq. #	Date Entered	Document Description	Initiating Document?	Amended Document?	Claim Amount	Filing Parties
1	28DEC2016	Notice of Civil Claim	Yes	No		(Plaintiff) LUTHERAN CHURCH- CANADA, THE ALBERTA-BRITISH COLUMBIA DISTRICT

Hearing and Results

Transfers

AVAILABLE INFORMATION
 Court Services Online (CSO) provides access to the following court record information:
 Civil court information - Supreme and Provincial Court

THIS IS EXHIBIT D
 referred to in the Affidavit of
 Sworn Before me this
 day of Dec A.D. 2017
 Commissioner for Oaths in and for Alberta
 Sumeet Sandhu
 Notary Public &
 Commissioner for Oaths
 in and for Alberta

Court record information on civil Provincial and Supreme Court activity throughout the province with the exception of family proceedings in Provincial Court.

Court Information - Court of Appeal

Court record information on civil and criminal Court of Appeal activity for appeals filed after 1 January 2004.

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PROHIBITED USE

Court record information is available through CSO for public information and research purposes and may not be copied or distributed in any fashion for resale or other commercial use without the express written permission of the Office of the Chief Justice of British Columbia (Court of Appeal information), Office of the Chief Justice of the Supreme Court (Supreme Court information) or Office of the Chief Judge (Provincial Court information). The court record information may be used without permission for public information and research provided the material is accurately reproduced and an acknowledgement made of the source.

Any other use of CSO or court record information available through CSO is expressly prohibited. Persons found misusing this privilege will lose access to CSO and may be subject to legal action, including prosecution.

File Summary Report

Lutheran Representative Action - QUESTIONNAIRE :
Entry # 1074

CLIENT PROFILE

Name

Glen Mitchell

Email

glen.mitchell@gmail.com

Phone

(780) 908-9109

Address

25 53030 Range Road 20
Parkland County, Alberta T7Y 2G8
Canada
[Map It](#)

CEF DEPOSITOR INFORMATION

Did you deposit/invest money into the Church Extension Fund of the Lutheran Church AB-BC District?

Yes

How much did you deposit into the CEF?

\$349,000.00

When did you make the deposit(s) (Day, Month, Year)?

12/04/2001

Have you Opted Out of the Representative Action?

No

Are you also a DIL Depositor?

Yes

When did you know that the CEF Fund was mismanaged and/or that the LCC AB-BC District was in financial trouble?

By letter dated January 5, 2015, the ABC District advised Mr. Mitchell that District was "facing some hardships" because "a number of congregations and other ministries have been unable to pay their mortgages..". Mr. Mitchell was further advised that a moratorium was being placed on withdrawals from and deposits to the Church Extension Fund. At a meeting held at St. Matthews in Stony Plain on January 27, 2015 Mr. Mitchell shocked to learn of the massive senior housing development called Prince of Peace and that at least 83% of the funds for CEF had been invested in the "Encharis" loans.

Please use the space below to provide us with a detailed description of your involvement with the Lutheran Church, including a detailed account of your decision to deposit into the CEF.

THIS IS EXHIBIT * E
referred to in the Affidavit of
Gwyn Wilson
Sworn before me this
day of DEC A.D. 2017
A Commissioner for Oaths in and for Alberta

Sumeet Sandhu
Student-at-Law, Notary Public &
Commissioner for Oaths
in and for Alberta

Lutheran Representative Action - QUESTIONNAIRE :
Entry # 1074

When Mr. Mitchell and his wife and family moved to their home in the fall of 1999 they began looking for a Lutheran Church to attend and bring up their children in. They began attending the Lutheran Church closest to them. Mr. Mitchell and his sons were baptized by the Pastor and became members of St. John's Lutheran Church in the year 2000. They attended St. John's Lutheran Church regularly until the fall of 2015, attending Church and fellowship events almost every week. Mr. Mitchell's family was a very active, involved family in St. John's Lutheran Church for many years.

Mr. Mitchell was introduced to the Church Extension Program at St. John's Lutheran Church through church bulletins, Pastors making announcements on CEF investment opportunities, and the CEF representatives in the congregation giving information and selling "tracky" stamps in the narthex after services. People attending church were solicited for funds in this way.

In 2001 there was a big CEF campaign known as 7 for 7 for 7 (help 7 churches with various capital projects needing funding and for 7 months receive 7%). At the same time, Mr. Mitchell's Mother passed away, leaving him almost \$7,000. The Mitchell family thought it would be appropriate to deposit the money in CEF and help churches in her memory and use these savings for their boys when they grew up and needed funds.

Based on promotional material from CEF, Mr. Mitchell understood that CEF was used to provide loans to congregations for capital purposes, such as land purchase, new construction of church facilities, renovation, repair, and expansion of existing facilities. Loans were backed by assets and only given to congregations who were in a position of repayment and never given for operating expenses. These were not offerings. CEF was presented as being diversified and professionally managed and totally safe. It offered minimal, yet competitive interest rates with savings accounts and GICs offered by the big banks.

After making an initial deposit he regularly received marketing materials thanking him for his deposits and sharing the ways in which they were a wonderful blessing to congregations in the District. Deposits were encouraged and an increasing need for funds was presented in the material. He received bank statements that listed his deposits and the interest received on these accounts. Never did he receive any financial papers about the health of the investment such as you might receive if investing money nor was he informed that most of the money he deposited was going to support one project that wasn't a church or school. As loans were backed by assets, loaned out based on stringent criteria, monitored and guaranteed by the District, deposits were deemed to be safe. The material published about CEF stressed how safe deposits were, how large and growing the fund was, its stability over many decades.

On at least two occasions between 2011 and 2014 deposits were made in person in meetings with Defendant Janice Ruf and Defendant Candace Rivet at the ABC District head office. During these meetings there was never any indication given that there may be issues with the state or stability of the CEF fund.

From the time Mr. Mitchell joined St. John's, the Pastor and membership talked about building a new Church building to replace the aging structure that was no longer adequate for the needs of the congregation. The funds to do so would be borrowed on loan from Church Extension Fund. The Mitchell's understood that to get a loan from CEF, individual members of the congregation had to have a certain amount of savings in CEF to qualify. Mr. Mitchell was told that the congregation also received a reduction in interest on their loan based on the amount of savings that their members had with CEF.

Other Comments

The deposits were made over a number of years, beginning in 2001. I also have deposits under my company Gemani Systems Group Inc.

Do you provide consent and agree herein to receive from us, Higgerty Law, emails and/or any other form of electronic messages for any purposes related to this legal matter and to receive any information regarding further legal and related services we may offer or solicit to you.

- I do consent and agree to the above statement.

**Lutheran Representative Action - QUESTIONNAIRE ;
Entry # 1074**

Date

11/27/2017

Lutheran Representative Action - QUESTIONNAIRE :
Entry # 1083

CLIENT PROFILE

Name

Willy Berger

Email

willyberger2014@gmail.com

Phone

(250) 392-6992

Address

27-500 Wotzke Drive
Williams Lake, British Columbia V2G 4S9
Canada
[Map It](#)

CEF DEPOSITOR INFORMATION

Did you deposit/invest money into the Church Extension Fund of the Lutheran Church AB-BC District?

Yes.

How much did you deposit into the CEF?

\$42,346.10

When did you make the deposit(s) (Day, Month, Year)?

04/01/1991

Have you Opted Out of the Representative Action?

No

Are you related to any of the Defendants in the Representative Actions (i.e, LCC, LCC AB-BC District and their Directors/Officers, Encharis, etc)? If so please indicate their name and your relationship with them.

Not related to anyone

Are you also a DIL Depositor?

No

When did you know that the CEF Fund was mismanaged and/or that the LCC AB-BC District was in financial trouble?

Letter from Lutheran Church Canada, Alberta / British Columbia District, dated January 5, 2015

Please use the space below to provide us with a detailed description of your involvement with the Lutheran Church, including a detailed account of your decision to deposit into the CEF.

THIS IS EXHIBIT F
referred to in the Affidavit of
GRINA Wilson
Sworn before me this
day of Oct A.D. 2017
A Commissioner for Oaths in and for Alberta

Sumeet Sandhu
Student-at-Law, Notary Public &
Commissioner for Oaths
in and for Alberta

Lutheran Representative Action - QUESTIONNAIRE :
Entry # 1083

Have been a member of St John Lutheran Church in Williams Lake since the early 1980's , no longer an active member since about 2005. We invested in CEF in order to help the Church lend money to new churches, the rate of return was also favorable for us. Over the years the reports showed no signs of any distress! The initial deposits were made in the late 1980's in the above question as to when the deposit was done, I inserted April 1, 1991 as I do not have a specific date. We than added funds into the account several more time.. My wife Verena also holds about \$40,307.61 in investments.

Other Comments

We believed all along that a church organization would be honest with it's depositors, show them the true pictures of the accounts, and only hire competent people, well faith made me blind as i did not double checked enough all the reports!

Do you provide consent and agree herein to receive from us, Higgerty Law, emails and/or any other form of electronic messages for any purposes related to this legal matter and to receive any information regarding further legal and related services we may offer or solicit to you.

- I do consent and agree to the above statement

Date

11/27/2017

Lutheran Representative Action - QUESTIONNAIRE :
Entry # 1080

CLIENT PROFILE

Name

Wiley, R. Hertlein

Email

wileyandtiger@icloud.com

Phone

(403) 271-8325

Address

10903 Willowfern drive s.s.
Calgary, Alberta T2J1r6
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[Map It](#)

CEF DEPOSITOR INFORMATION

Did you deposit/invest money into the Church Extension Fund of the Lutheran Church AB-BC District?

Yes

How much did you deposit into the CEF?

\$125,000. 2014. (Spouse \$50,000. In 2012)

When did you make the deposit(s) (Day, Month, Year)?

07/02/2014

Have you Opted Out of the Representative Action?

No

Are you related to any of the Defendants in the Representative Actions (i.e, LCC, LCC AB-BC District and their Directors/Officers, Encharis, etc)? If so please indicate their name and your relationship with them.

Only by our Lutheran faith...

Are you also a DIL Depositor?

Yes

When did you know that they CEF Fund was mismanaged and/or that the LCC AB-BC District was in financial trouble?

When we received our letter in the mail in early January 2015.....

Please use the space below to provide us with a detailed description of your involvement with the Lutheran Church, including a detailed account of your decision to deposit into the CEF.

THIS IS EXHIBIT - 01
referred to in the Affidavit of
Erin Wilson
Sworn before me this 1
day of DEC A.D. 2017
A Commissioner for Oaths and for Alberta

Sumeet Sandhu
Student-at-Law, Notary Public &
Commissioner for Oaths
in and for Alberta

Lutheran Representative Action - QUESTIONNAIRE :
Entry # 1080

I have been a Lutheran by birth, baptized and confirmed. Our family heritage has been Lutheran since the reformation was started by Martin Luther 1517 and when it spread into southern Germany (Bavaria)

My spouse and I have lived in Calgary since 1975 and became members of the Lutheran church of the good shepherd LCC synod in 2000. During that period and 2014 we noticed church extension fund (CEF) brochures in most pews, suggesting why you should consider depositing in the CEF, due to the good works it provides. In April 2012 we looked into the CEF by informing ourselves with the following - discussed the following with the administration office in Edmonton. 1: are the deposits covered by insurance, response no need as this has been available to church members since the 1920's. 2: it is guaranteed by the ABC district. 3: what are the deposited member funds used for, response for new mission congregations start up buildings, renovations, operating funds in case of need etc.. 4: are those funds secured by mortgages against assets, response yes. With a monthly repayment schedule. 5 will you mail current financial statements, response at a later date as we have changed accounting firms, never received. Based on our discussions and on our Lutheran faith and trust, we made the \$50,000 in spouses name to mature April 2015.. During the period of 2012 and February 2014 no mention was ever made by abc, our pastor as a director and the brochures remained in the pews. We were not aware of CEF used to fund the Prince of peace complex.

Since my spouse was diagnosed with Crohn's in 2011 and treatment was mainly covered by our insurance company, in 2013 we decided we should sell all our public stock as her specialist indicated an operation to help out with the Crohn's is was required. We were not sure of the treatment thereafter as to expense cost coverage. By the end of 2013 all stock was sold and we decided to park \$125 thousand with the CEF for one year until we knew if we had coverage with AHC, our INDEPENDANT insurance or would a big portion be for our account. On February 7 2014 contacted the administrative group to arrange for the deposit, no mention indicating they had problems with cash flow. After explaining the Crohn's it was suggested by the officer to for for a three year plan for a higher interest facto. I advised will obviously require portions a lot earlier, response not an issue as you can chip portions off as required.

Ten months later early January 2015 we were notified by letter they had issues and had called Deloitte to review and commence a work out, in the meantime CEF frozen, however DIL registered plan funds were safe and available. In mid January 2015 pastor Scheffer and Kurt Robinson executive financial officer spoke to the Calgary CEF depositors at Foothills Lutheran church. I asked several questions, but this one was very clear to me. How much in dollar value to the directors have EACH. response 5 million. They assured all in attendance that the DIL deposits were safe.

On January 28 2015 emailed the president Schiemann placing this misjustice to the depositors squarely on him as a failure of management responsibilities, Also this had to be known as an issue long before the end of December 2014 and it should have been stopped. Advised he was in charge of a PONZI scheme for some time rather than a Lutheran deposit program. We were able to leave for a month break from this additional stress and when we returned mid march 2015 we were informed that DIL was also now in restructure by Deloitte. I again sent an email to Schiemann informing him this you would have to had known in 2014, that clearly you and your financial directors and officers clearly mismanaged both CEF and DIL for years and the objective was how to avoid being personally sued. This not only caused additional stress for my spouse, but in August 2015 I suffered heart stress and have been on medication ever since.

Some time in May or June of 2015, our pastor Dressler call for a meeting of all CEF and DIL depositors for a quick meeting after a church service, advising he releases us to sue the directors. This must of been pasted down from the abc district. This group of directors don't need to advise depositors what we can do. They still feel they are above us an individual.

In October 2016 the plan to accept the NEWCO shares (now Sage Properties) was presented the second time. The plan was a presentation prepared by the District Credit committee and the CRO Cam Sherban (Kluane) engaged by the ABC District Executive recommended by Deloitte. The depositors at this point were between a rock and a hard spot, as how best do you protect the major asset for the recovery of ones deposits. Vote no and let Deloitte fire sale the assets. Vote yes and sell at a later date! Hoping the economy gets better, but at least in mind feel you have control. Unfortunately the plan was prepared and devised by the CRO and district credit group that a selected management group and six directors was already in place, which was part of supposedly court approved. The vote passed. Now many voters are not happy with the directors and management team of Sage as non of the group are former depositors, but rather appointed by church congregations that have opted out of suing the directors. The CEO management, the chairperson and CRO are all former Deloitte employees. This picture becomes distasteful. In summary, our cash position of life savings is in shares of Sage and in deposits of DIL, registered plans. We are now operating our household under a very tight budget, with a number of cut backs. With the financial stress and medical tryout that did not place my spouses Crohn's under control Remicade and Humira, she is now on Stalera. This is not what we expected from our Lutheran Heritage and the fact we are in our late 70's, we hoped to spend our winter months in the south, we still try but only for a shorter time.

**Lutheran Representative Action - QUESTIONNAIRE :
Entry # 1080**

We as others strongly believe the pastor directors and other support groups new of this disgraceful ending long before 2014, but carried on as a PONZI hoping it would clear up eventually. Their biggest fear was fear alone, that being sued. It is obvious to me they had carried on conversations long before 2014 with firms of how best to protect themselves and didn't concern themselves with the depositors of the day. Not what I would call living by the word. Christians. It is also my understanding a number directors had no idea of the Financial disaster that was about to hit them. It is up to the appointed director to find out his or her responsibilities when one accepts that position. IF THEY DID NOT KNOW THEY OUGHT TO HAVE KNOWN.

LUTHERAN CHURCH WINNIPEG Excutive body was totally aware of ABC district involvement with CEF AND DIL funds and are totally accountable for the actions taken over the years, going back to the 1990's...

My spouse and I have resigned from the LCC synod and our congregation Lutheran church of the good shepherd. Our pastor David Dressler was aware of my disappointment in the management and leadership of the CEF and DIL going into default and liquidation. He has made no attempt to contact us requesting re consideration to rejoin or sorry. Dead silence. Sorry would of course admit to fault.

Other Comments

Err in whatever you think should be left out is fine by me. I didn't proof read so please correct any errors. Thanks a bunch . I'm tired of this and I reall wish your team to have all the success in nailing this down , Remember don't let the guilty try to settle by only the insurance paying . We need to go after a number of individual and the parent body LCC Winnipeg Also if we commence with the Alberta courts and it goes to trial insurance coverage required for me and Glen Mitchell

Thank you

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- I do consent and agree to the above statement

Date

11/27/2017