

**FORM 87**  
**NOTICE AND STATEMENT OF THE RECEIVER**  
(Pursuant to subsection 245(1) and 246(1)  
of the *Bankruptcy and Insolvency Act*)

**IN THE MATTER OF THE RECEIVERSHIP OF  
KS PROPERTY MANAGEMENT INC.  
IN THE CITY OF CHILLIWACK  
IN THE PROVINCE OF BRITISH COLUMBIA**

The Receiver gives notice and declares that:

1. On October 28, 2024, pursuant to an order (the "**Receivership Order**") of the Supreme Court of British Columbia, Deloitte Restructuring Inc. was appointed as receiver (the "**Receiver**"), without security, of all of the assets, undertakings, and property (collectively, the "**Property**") of KS Property Management Inc. ("**KSPM**"), as described below:

<b>Description</b>	<b>Book Value CAD\$</b>
Cash	5,217
GST receivable	623
Deferred tax receivable	88,557
Due from CDG Enterprises	160,000
Property held for development	13,842,659
<b>Total</b>	<b>14,097,057</b>

Notes

- (1) The foregoing are the book values of the Property as indicated in the unaudited financial statements of KSPM as of October 31, 2024. The Receiver has not audited, reviewed or otherwise attempted to verify the accuracy or completeness of the information, and accordingly, expresses no opinion or other form of assurance on the information contained herein. The Receiver provides no comment on the realizable value of the Property.
- (2) Property held for development includes the "Osprey Lands", which consist of 16 bare land strata lots located in a development in Wardner, British Columbia ("**BC**"), known as Osprey Landing, and the "Twin River Lands", which consist of a development parcel in Castlegar, BC, which is intended to be subdivided into 50 bare freehold lots in a development known as Twin River Estates.
2. The Receivership Order was granted pursuant to an application made by Kootenay Savings Credit Union on October 28, 2024. A copy of the Receivership Order and materials relating to the proceedings may be viewed at the Receiver's website at:  

[www.insolvencies.deloitte.ca/en-ca/KSPM](http://www.insolvencies.deloitte.ca/en-ca/KSPM)
3. The Receiver took possession and control of the Property on October 28, 2024.

4. The following information relates to the receivership:

(a) Registered office address of KSPM:

PO BOX 390, Chilliwack, BC V2P 6K2, Canada

(b) Principal line of business:

Property developer

(c) Amounts owed to each creditor that holds security on the Property pursuant to the available books and records of KSPM and registrations under the Personal Property Registry for BC are as follows:

<b>Secured Creditor</b>	<b>Amount Owing CAD\$</b>
Kootenay Savings Credit Union	15,288,718

Notes

(1) The Receiver understands that Kootenay Savings Credit Union (“**KSCU**”) holds a first-ranking mortgage on the Osprey Lands and on the Twin River Lands and commercial security agreements that create a security interest charging all of the present and after-acquired personal property of KSPM. As of October 28, 2024, KSCU’s total debt, exclusive of the KSCU’s costs, was approximately \$15.3 million, as stated in Affidavit #2 of Cherele Arnesen dated October 18, 2024.

(d) The Receiver understands that the following creditors have registered builders lien claims in respect of the Twin River Lands:

<b>Builders Lien Claims</b>	<b>Book Value CAD\$</b>
Geo Stabilization International Inc.	218,894
Marwest Industries Ltd.	1,787,447
Pennco Engineering (BC) Ltd.	204,310
Colas Western Canada Inc.	380,050
<b>Total</b>	<b>2,590,701</b>

(e) A list of other creditors of KSPM and the amount owed to each creditor is attached hereto as **Schedule “A”**. The creditor listing is based on the available books and records of KSPM as of October 31, 2024.

(f) The intended plan of action of the Receiver is to monetize KSPM’s Property in a manner that maximizes realizations for creditors. This may include undertaking a current state assessment of the Twin River Lands, assessing the cost-benefit of completing the construction and registration of the subdivision and undertaking a sale process for both the Twin River Lands and the Osprey Lands.

(f) Contact person for the Receiver:

Kaleb Butt  
Deloitte Restructuring Inc.  
410 West Georgia Street, Vancouver, British Columbia, V6B 0S7, Canada  
Phone: (604) 595-5422  
Email: [kbutt@deloitte.ca](mailto:kbutt@deloitte.ca)

Dated at the City of Vancouver in the Province of British Columbia, this 5<sup>th</sup> day of November, 2024.

**DELOITTE RESTRUCTURING INC.**

In its capacity as Court-Appointed Receiver of  
KS Property Management Inc.,  
and not in its personal capacity



Per: Paul Chambers, FCA(UK), CIRP, LIT  
Senior Vice-President

**SCHEDULE "A"**  
**CREDITOR LISTING**

<b>Creditor</b>	<b>Address</b>	<b>Street Address</b>	<b>City</b>	<b>Province</b>	<b>Postal Code</b>	<b>Country</b>	<b>Amount CAD\$</b>
<b><u>Secured Creditors</u></b>							
Kootenay Savings Credit Union	C/O Jennifer Cockbill, MCM Law LLP	#401 - 121 5th Avenue	Kamloops	BC	V2C 0M1	Canada	15,288,718
<b><u>Builders Lien Claimants</u></b>							
Geo Stabilization International Inc.	C/O Chris Moore, McLean & Armstrong LLP	300 – 1497 Marine Drive	West Vancouver	BC	V7T 1B8	Canada	218,894
Marwest Industries Ltd.	C/O Devon Lehrer, Jenkins Marzban Logan LLP	Suite 900 Nelson Square, 808 Nelson Street	Vancouver	BC	V6Z 2H2	Canada	1,787,447
Pennco Engineering (BC) Ltd.	C/O Watson & Company	Suite 2-609 Baker Street	Nelson	BC	V1L 4J3	Canada	204,310
Colas Western Canada Inc.	C/O Chris Moore, McLean & Armstrong LLP	300 – 1497 Marine Drive	West Vancouver	BC	V7T 1B8	Canada	380,050
							<b>2,590,701</b>
<b><u>Unsecured Creditors</u></b>							
Tyler Boettcher and Leanne Boettcher	C/O Miranda J. Wardman, Pushor Mitchell Lawyers	301 – 1665 Ellis Street	Kelowna	BC	V1Y 2B3	Canada	Unknown
Baker Newby LLP	C/O Adnan Habib and Dane Reavie	PO Box 390	Chilliwack	BC	V2P 6K2	Canada	Unknown
Canada Revenue Agency	Surrey National Verification and Collections Centre	9755 King George Boulevard	Surrey	BC	V3T 5E1	Canada	Unknown