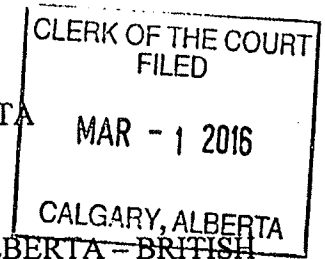


COURT FILE NUMBER: 1501-00955

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
INFORMATION OF PARTY #700 – 375 Water Street
FILING THIS DOCUMENT Vancouver, B.C. V6B 5C6

Attention: Errin A. Poyner

Telephone: 604-687-7700

Fax: 604-687-5596

File No. K-5820(1)

AFFIDAVIT OF ELVIRA THEODORA KROEGER

Sworn on February 29, 2016

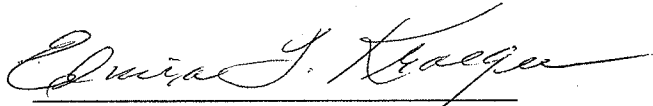
I, ELVIRA THEODORA KROEGER, of Delta, British Columbia, SWEAR AND SAY THAT:

1. I am a depositor to both the Lutheran Church – Alberta British Columbia District's ("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 of age, the widow of Pastor Ernst K.H. Kroeger, who died in 2008.

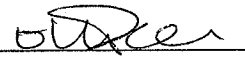
3. I worked as a school teacher until I was 75. Because I was only a part-time teacher for all of my teaching years, I have a very small pension of \$202.00 per month.
4. I have for 28 years been a member of St Luke Lutheran Church, Surrey, British Columbia, where my late husband and I were persuaded to invest our savings with the CEF and the DIL.
5. My late husband and I lived very frugally in order to save for our retirement years.
6. My husband and I never drew any of the interest due to us on our deposits, but allowed it to be compounded on renewal, in the expectation that we would have a nest egg sufficient to provide assisted living care, should we need it in our old age.
7. When at the age of 87, my husband, Ernst, went into extended care at Laurel Place in Surrey, I paid somewhat in excess of \$1,100 per month fees for his care out of our CPP and OAS with some help from the Department of Veterans Affairs. All this time we were leaving all our deposits with accrued interest in the CEF and DIL funds of District.
8. In or about 1993 I could have collected my school teacher's pension of \$202.00 per month, but chose to continue working part-time since that paid me more than the teacher's pension, which I believed I was forfeiting. However, in or about 2003 I learned that my uncollected teacher's pension had been accumulating to a total of approximately \$24,000, all of which I received in or about 2004. Thinking it would be in the best of hands with the CEF, I deposited all of that pension back-pay in the CEF in the course of several subsequent deposits.
9. My late husband and I had separate deposits with the CEF. When he died, leaving me as his sole heir, I did not change the name of his deposit accounts.
10. Between my late husband and me, we have deposits with the CEF and the DIL which as at December 31, 2013 totalled \$70,060.71. Those deposits represented over 45% of all our life savings.
11. I am in reasonably good health, apart from requiring a hip replacement. However, in the not too distant future I will likely require assisted or complex care, the quality of which will depend on what I can afford to pay. The losses that I have sustained in the CEF and DIL have significantly depleted the funds available for my future care. I need to recoup those funds before my health declines and I can no longer live independently.

12. I make this affidavit in opposition to the application of the Monitor for a stay of BCSC Action No. S161737, in which I am a plaintiff.

SWORN BEFORE ME at the)
City of Vancouver, in the)
Province of British Columbia, this)
29th day of February, 2016.)



ELVIRA THEODORA KROEGER


_____)
Emilie LeDuc)
A Commissioner for taking)
Affidavits within the Province of)
British Columbia.)

EMILIE E.A. LEDUC
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