

AFFIDAVIT

I, the undersigned, MAHDI ALTALIBI domiciled and residing at 4030 West Hill avenue in the City and District of Montréal, do solemnly declare and state:

1. I graduated from Dawson college at the end of the Winter 2007 semester, and I am now registered at McGill University in the Faculty of Arts for the Fall 2007 semester;
2. I am a member of the Dawson Student Union (DSU), which is one of the five Students' Associations that form the Canadian Federation of Students-Quebec Component (CFS-Q);
3. The five local Students' Associations members of the CFS-Q are the following: the Post-Graduate Students' Society of McGill University (PGSS, local 79), the Concordia University Graduate Students' Association (GSA, local 83), the Concordia Student Union (CSU, local 91), the Dawson Student Union (DSU, Prospective Member), and the Students' Society of McGill University (SSMU-Prospective Member);
4. On June 19th 2007, I attended a Special General Meeting (SGM) of CFS-Q in Montreal,
5. Arriving at the Elections point of the Agenda, Nina Amrov introduced herself and answered a few questions;
6. A secret vote was held and Ms. Amrov was elected as Chairperson of the Executive Committee (EC) of the CFS-Q;
7. The results of the election for Chairperson were moved by the CSU representative and seconded by the DSU representative;
8. The election for Deputy Chairperson position followed. I, along with the other candidate, was asked to introduce myself and to say why I was interested in becoming Deputy Chairperson of CFS-Q. Representatives the PGSS and by the GSA asked a few questions about my experiences;
9. I was then elected as Deputy Chairperson by secret ballot;
10. The results of the election for Deputy Chairperson were moved by the representative of the SSMU and seconded by the representative of the GSA;

11. No one was elected for the position of National Representative because no candidate received a majority of votes;
12. The SGM continued with the other items on the agenda;
13. On June 21st, Ms. Amrov and I met with CFS-Q employee, Mr. Georges Soule, in the CFS-Q office in Montréal;
14. Mr. Soule gave us little information about the functioning of CFS-Q and what role it has towards the members of the Students' Associations affiliated to the CFS-Q;
15. We asked Mr. Soule to contact the former EC members in order to obtain the keys to the office. He claimed that he tried contact them but they weren't answering his calls;
16. I called one of the former EC members, Mr. Rosenshein, with my personal cell phone. He did not answer;
17. I asked Mr. Soule to call Mr. Rosenshein. He called and told us that there was no answer;
18. Seconds later, I called Mr. Rosenshein using Mr. Soule's cell phone and he answered. I then gave the phone to Mr. Soule and told him to tell Mr. Rosenshein to come to the office and give us his keys since he was not a member of the EC anymore. Mr. Rosenshein refused and said that he was busy;
19. After hanging up, Ms. Amrov told Mr. Soule that as EC members of the CFS-Q, for security reasons, we needed keys, official documents, minutes of the SGM, bank information and email information to be ready for the next day. Mr. Soule agreed;
20. On June 22nd, Ms. Amrov and I both called Mr. Soule to see if the aforementioned items were ready, but he did not answer his phone;
21. Around June 26th, realising that we still did not have access to the office, which prevented us from undertaking our mandate as Chairperson and Deputy Chairperson of CFS-Q, Ms Amrov and I thought it would be appropriate to change the locks of the office, because former EC members still had access to the office;
22. I sent an email to the landlord, Mr. Gabriel Bouganim, requesting a change of locks for the office;

23. In response to this email, the landlord asked me to call him;
24. I called the landlord and he asked me that this request be done by someone familiar to him; in other words a staff person or someone from the former CFS-Q EC;
25. Ms. Amrov and I tried to contact Mr. Soule on his cell phone and by email several times to ask him to contact the landlord, but he did not respond until June 29th;
26. On June 29th, Ms Amrov forwarded me a text message that she had received from Mr. Soule explaining to her that he was not able to reach the landlord because of personal reasons;
27. I then called Mr. Soule and told him that a simple email to the landlord was not too much to ask even though he is going through hard times. He told me that he would send the email to the landlord;
28. On July 2nd, after being away from Montreal, Mr. Soule contacted the landlord of the CFS-Q office;
29. Without our knowledge, the locks were changed in the early morning of July 2nd;
30. On July 4th 2007, an e-mail was received at the CFS-Q office from the President of the CSU, Ms. Angelica Novoa, telling us that she doubted the legitimacy of the election and that a SGM should be called on this issue;
31. On July 9th, Mr. Soule gave me the minutes of the June 19th SGM signed by himself in his capacity as Secretary of the meeting;
32. On July 10th, Nina Amrov and I went to the Caisse Populaire Desjardins at the Complexe Desjardins. and met with Mr. François Barrette, an employee of the Caisse responsible for who providing services to enterprises;
33. During the meeting with Mr Barette, all required documents were handed in and we signed the signature cards;
34. At the end of the meeting with Mr. Barette, I asked him if we needed to provide him with anything else and he replied that he had all the documents he needed;
35. On July 16th, I received a second email from Ms. Angelica Novoa, President of the CSU, reminding me of her request for a SGM, and cautioning Ms. Amrov and I from any transfer of power and notifying us that she would hold us responsible if any damages resulted from our refusal to give up power until the validity of the elections were confirmed;

36. On July 17th, I received an email motion dated July 16th from PGSS requesting a SGM on July 30th at noon and that an agenda be prepared for that meeting. This agenda was to include the following matters : approval of a draft budget for 2007-2008, any motion with regards to election previously held and elections to be held for the remaining positions;
37. On July 17th, I received an email from Ms. Amrov, calling an EC meeting to be held on July 24th, with a proposed agenda taking into consideration the many concerns expressed by member locals. The proposed agenda included following matters : ratification of new local representatives, operating budget 2007-2008, request for Special General Meeting (local 91), Quebec organiser job description (local 83);
38. On July 18th, I received an email from Mr. Max Silverman, VP External for the SSMU, explaining that he had spoken to Ms Erika Jabouin, CSU VP External, and that he had learned that the reason why our elections were being contested was because Ms. Amrov and I were members of Students' Associations that did not pay fees directly to CFS-Q, which disqualified us as candidates, according to CFS-Q by-laws. He added that CSU had consulted lawyers and had a legal opinion to this effect (exhibit P-5);
39. Attached to the email mentioned in paragraph 38 was another email from Amanda Aziz, Chairperson of CFS-National, stating the SSMU was eligible for CFS-Q election since there is no " prospective membership " fee for the CFS-Q;
40. In the morning of July 24th, I received a copy of the an email sent by Ms. Amrov to Ms Angelica Novoa, President of the CSU, requesting a copy of the formal resolution of the CSU Council demanding for a SGM, as required by CFS-Q by-laws;
41. The members of the CFS-Q EC arrived at 4:00PM, July 24th, at the CFS-Q office;
42. As Ms. Malamo Beaumont-Savvas from the DSU was arriving to the office, a group of five (5) Dawson students, who I recognised as friends of Ms. Shanice Rose, were blocking the door to prevent Ms. Beaumont-Savvas from going in and yelling at her that she had no right to be there;
43. After allowing them to discuss their concerns outside the door for ten (10) minutes, the discussion became loud at which point I asked them to either walk in and attend the meeting peacefully or leave;

44. As they were still refusing to allow Ms Beaumont-Savvas to enter the office, Ms Amrov asked that I stay outside until the problem was solved;
45. After approximately 45 minutes, the group finally allowed Ms. Beaumont-Savvas to enter the office;
46. While I was managing the situation outside, there was another discussion inside involving Ms. Angelica Novoa (CSU), Mr. Noah Stewart (CSU) and members of the CFS-Q EC. According to the representatives of the CSU, there was serious doubt about the legitimacy of the election where Ms. Amrov and I had been elected, and they were claiming that because of the e-mail that they had sent on July 4th 2007, a SGM should have been called to that effect;
47. Ms. Novoa presented a letter signed by herself to justify her request calling for a SGM, claiming that she had the power of the CSU Council under the CSU Constitution;
48. Some of the local representatives pointed out that under the CFS-Q by-laws, a resolution from the Council should be presented, and not a equivalent;
49. Ms Amrov suggested that these subjects be discussed during the official EC meeting that was to be held within a few minutes;
50. The CSU representatives decided to boycott the meeting and left the office ;
51. The EC meeting started at around 5:00PM, chaired by Ms. Amrov and the proposed agenda was followed through;
52. Throughout the EC meeting, there was ratification of each local representative, as an official delegate of their Students' Association to the CFS-Q;
53. When came the time to ratify the DSU position, there was a conflict between Ms. Beaumont-Savvas and Ms. Rose;
54. Ms Amrov proposed that the ratification of the DSU representative be done at the next meeting, when things would be much clearer about who was to be the legitimate representative for DSU;
55. As per said agenda, we moved on to the approval of the Budget, the presentation of the Campaign proposal and the job description of staff person;

56. With respect to this last point, a resolution was passed to adopt a new job description for the Office Manager;
57. This new job description led to the termination of Mr. Soule's job contract;
58. The EC adopted a resolution to form a Hiring Committee;
59. During that meeting it was also decided that another EC meeting be held on August 2nd and a SGM on August 3rd;
60. After the EC meeting was adjourned, Mr. Soule was asked in front of the EC to hand over his office key. After refusing to do so and leaving the office, it was recommended by the other members to have the locks changed;
61. The locks were changed on July 25th;
62. On July 26th, I received an email from Ms. Amrov announcing the August 2nd EC meeting. The proposed agenda included the following matters: Ratification of Local Representatives, Progress Report of Hiring Committee, Revised Budget 2007-2008, Full Campaign Guide;
63. On July 27th, I received an email from Angelica Novoa, addressed to me and to all local members, where one can read, referring to the SGM of August 3rd:

"As such Local 91 is submitting the following motions for consideration on the agenda,
BIRT Nina Amrov be removed as director
BIRT Mahdi Altaliva be removed as director
and as there may be a removal of directors
Please take this as notice that a by-election will be held at the upcoming SGM."
64. On July 30th, I received an email announcing the August 3rd SGM. The proposed agenda included the following matters : Approval of the Agenda, Approval of the Budget, Approval of the Campaign Guide;
65. I received an email in which Ms. Amrov clarified her position on Mr. Stewart's disapproval of not adding Ms. Novoa's motion to the SGM Agenda. Ms. Amrov invited the unsatisfied local members to present a motion during the item "Approval of the Agenda" to add these subjects to the SGM agenda;
66. On August 2nd, the EC at the CFS-Q office took place;

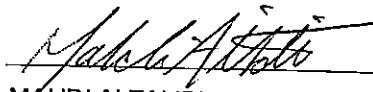
67. Before the meeting began, Mr. Stewart and Ms. Jabouin (CSU VP External) claimed that they would not recognise it;
68. Mr. Stewart left, but Ms. Jabouin stayed and attended the meeting;
69. We went through the agenda as it had been approved with the few changes;
70. We started with the ratification of the DSU local representative. Ms Amrov asked each side to present their case and the EC would decide what to do. After an hour of discussion, it was decided that the resolution provided by Ms. Rose stripping Ms. Beaumont-Savvas from her role of representing DSU at CFS-Q was invalid since at the time of that decision, there was no quorum for the DSU EC meeting;
71. Once that was decided, a motion to recognise Ms. Beaumont-Savvas as the representative of DSU to CFS-Q was adopted;
72. After that decision, Ms. Rose and Ms. Jabouin left the meeting;
73. Since the meeting still had quorum, we continued through the agenda;
74. On August 3rd, the SGM started at 12:25PM. I was the designated Secretary for this meeting;
75. At the beginning of the SGM, a long and heated debate took place concerning who had the right to vote for the DSU within the CFS-Q;
76. Ms. Amrov recognised Ms. Beaumont-Savvas' vote, as was decided at the August 2nd EC meeting.
77. Her decision was challenged by the CSU. This decision was appealed to the assembly and the decision adopted by the Chairperson was upheld by the Assembly;
78. Following that debate, a motion of adjournment was put forward and adopted by the Assembly;
79. After that decision was taken and the meeting adjourned, some people did not agree and wanted to continue the meeting, but they did not form a majority, with only two (2) local associations remaining: PGSS and CSU;
80. I stood up and told them that according to my understanding Roberts Rules of Order, as the Secretary of the meeting and minute keeper, the meeting had been adjourned, so I took the original and only copy of the minutes and left;

81. After the meeting was adjourned, we did not know what would be the action of the dissenting people at the meeting. As a precaution, Ms Amrov and I sent a registered letter to the Caisse Populaire Desjardins to ensure that no attempts to change the signing officers would take place in the following days;
82. To this day, I haven't received any e-mail, letter or phone call from the dissenting group telling us what happened after we left the meeting;
83. On August 5th, at night, I received a phone call from a volunteer worker telling me that he was unable to access the office and that the locks had been changed;
84. That same night, I discovered that someone had hacked into my email account and changed my password;
85. On August 6th, I called the police and I told them that I didn't have access to my office since someone had changed the locks on the door;
86. The police told me to bring in a locksmith to have the locks changed back, to call the landlord to find out who broke in and to call back the police after this was done;
87. The landlord, being unaware of Mr. Soule's contract termination, told me that Mr. Soule had called him at 1:00AM Sunday morning saying that there was glue in the keyhole and he couldn't use his key to access the office;
88. In fact, Mr. Soule never had the key to the office, since the locks had been changed on July 25th, after his contract was terminated;
89. After the locksmith gave me access to my office, I found out that the chequebook was missing as well as financial documents from the previous year;
90. Since there was no chequebook, I had to pay the locksmith 450.00\$ from my personal account;
91. After I found out that those items were stolen, I phoned the police and they came to file a report;
92. The police report number is 20-070806-029;
93. I learned from the affidavit of Mr. Georges Soule that he is the person that had the lock change and he took the checkbook from the office;

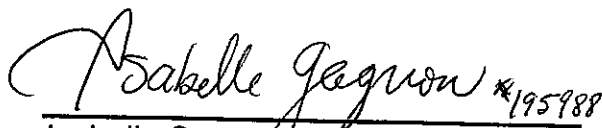
94. Considering the seriousness of the violations committed by certain people, we decided to consult a lawyer to take the necessary measures to regain our rights to the bank account and to prevent another intrusion into the office;
95. On August 8th, I received a call from a volunteer worker informing me that there were people standing outside the office, with the apparent intention of drilling the lock;
96. I called the police immediately to stop their intrusion;
97. I arrived at the office around 9:00PM to find Mr. Soule, Ms. Jabouin and Mr. Stewart along with a locksmith, standing outside;
98. I informed them that what they were doing was illegal and that the police were on their way;
99. The police made sure that no lock would be changed and that the status quo would remain until they had a court order;
100. The CFS-Q owes me more than 1,700.00\$ in unpaid salary;
101. I have not received any income since I was elected on June 19th, and I am currently in a debt that has caused me a great amount of hardship and stress;

All the above facts alleged in this affidavit are true.

And I have signed in Montreal,
this 6th day of September 2007


MAHDI ALTALIBI

Solemnly declared before me, in
Montreal, this 6th day of September
2007


Isabelle Gagnon *pro curate* #195988

Copie conforme


OUELLET, NADON & ASSOCIÉS