

## AFFIDAVIT

I, the undersigned, Nina Amrov, domiciled and residing at 8801 rue Giroux , in the City and District of Montréal (LaSalle), Québec, H8R 2V3 do solemnly declare and state :

1. I am an Arts student at McGill University, program of Political Science and International Development Studies;
2. I am a member of the Student's Society of McGill University (SSMU) which is one of the five (5) Students' Associations that form the Canadian Federation of Students-Quebec component (CFS-Q);
3. The CFS-Q exists since April 3<sup>rd</sup> 1998 and is legally incorporated in accordance with Part 3 of the Loi des Compagnies du Québec as appears in the Lettres Patentes of the CFS-Q (exhibit P-1);
4. The CFS-Q has adopted a Constitution and bylaws as appears from the Constitution, Bylaws and Standing Resolutions (exhibit P-2);
5. The five (5) 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);
6. On June 19<sup>th</sup> 2007, I attended the Special General Meeting (SGM) of the CFS-Q where elections were held to elect a new Executive Committee (EC) of the CFS-Q;
7. At the Elections point of the Agenda, I was asked to introduce myself and to say why I was interested in becoming Chairperson of CFS-Q. Representatives of the PGSS asked a few questions about what would be my goals if I was elected to the position of Chairperson;
8. I was then elected as the Chairperson ;
9. There was no opposition or disagreement regarding my election;
10. The results of the election for Chairperson were moved by the representative of CSU and seconded by the representative of DSU;
11. The election of the Deputy Chairperson followed the same process and Mr. Madhi Altalibi was elected;

12. The results of the election for Deputy Chairperson were moved by the representative of the SSMU and seconded by the representative of the GSA;
13. There was no opposition or disagreement regarding that election;
14. No one was elected for the position of National Representative because no candidate received a majority of votes;
15. On June 21<sup>st</sup>, Mr. Altalibi and I met with CFS-Q employee, Mr. George Soule, in the CFS-Q office in Montréal;
16. Mr. Soule gave us little information about the functioning of the CFS-Q and its role vis-a-vis the members of the Students Associations affiliated to the CFS-Q;
17. We asked Mr. Soule to contact the former members of the EC in order to obtain the keys to the office. He claimed that he tried to contact them but they did not return his calls;
18. Mr. Altalibi called one of the former EC members, Mr. Rosenshein, who answered. Mr. Altalibi gave the phone to Mr. Soule and told him to tell Mr. Rosenshein to come to the office to 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, I told Mr. Soule, as Chairperson of the CFS-Q, that for security reasons, I 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 22<sup>nd</sup>, I called Mr. Soule to see if all the aforementioned items were ready, but he did not answer his phone;
21. On June 25<sup>th</sup>, I received a call from Mr. Soule giving me notice that he was in Ontario for personal reasons. I told him that he could stay in Ontario as long as he needed to;
22. Around June 26<sup>th</sup>, 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, we thought it would be appropriate to change the locks of the office, because former EC members still had access to the office;
23. Mr. Altalibi sent an email to the landlord of the CFS-Q office requesting a change of locks for the office;

24. In response to this email, the landlord asked that this request be made by a person familiar to him; in other words, a staff person or someone from the former CFS-Q EC;
25. Mr. Altalibi and I tried to contact Mr. Soule on his cell phone to ask him to contact the landlord, but he didn't respond until June 29<sup>th</sup>;
26. On June 29<sup>th</sup>, I received a text message on my cell phone from Mr. Soule explaining to me that he wasn't able to reach the landlord because of personal reasons. Moreover, he told me that he had been able to contact Mrs. Margaret Carlyle, former Chairperson of the CFS-Q, and that she would contact me before noon on that day to provide me with keys to the office;
27. Around noon, Mrs. Carlyle contacted me by text message, telling me that she got the message about the keys but was too busy to meet me and that I should call her when I was free;
28. I called her right away, but received no answer;
29. I then text messaged her telling her that I had called her;
30. Mrs. Carlyle responded by text message, telling me that she was on her bike and busy with moving. She told me that she would try to call me back at some point;
31. On July 1<sup>st</sup>, I sent an email to Mr. Soule insisting again that he contact the landlord about the locks;
32. On July 2<sup>nd</sup>, Mr. Soule sent an email to the landlord of the CFS-Q office and the locks were changed;
33. On July 4<sup>th</sup>, I received an email from Ms. Angelica Novoa, the CSU President, demanding a SGM because she questioned the legitimacy of the elections and implied that no transfer of power should take place until the SGM was to be held (exhibit P-4);
34. On July 9<sup>th</sup>, Mr. Soule finished editing the minutes from the June 19th SGM in which elections were held, and gave us a copy which he signed (exhibit P-3);
35. On July 10<sup>th</sup>, Mr. Altalibi and I went to the Caisse Populaire Desjardins at Complexe Desjardins to change the signing officers of the CFS-Q account, Mr. Francois Barette was the bank representative who served us;
36. Prior to the meeting with Mr. Barette, I had called the Caisse Populaire to inquire about the process for changing signing officers;

37. The person with whom I spoke told me that the Caisse Populaire would send me the required documents to fill out and that I should also have two pieces of identification for myself and Mr. Altalibi and a resolution confirming the results of the June 19<sup>th</sup> election;
38. During the meeting with Mr. Barette, all required documents were handed in, we signed the signature cards, and Mr. Barette told us that he would be dealing with our file and that if we had any questions, he would be the one to contact;
39. On July 16<sup>th</sup>, I received a second email from Ms. Angelica Novoa, President of the CSU, reminding me of her request for a SGM, cautioning me and Mr. Altalibi against 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 was confirmed; the email produced as exhibit D-1;
40. On July 17<sup>th</sup>, I received a motion by email dated July 16<sup>th</sup> from PGSS requesting a SGM on July 30<sup>th</sup> at noon and that an agenda be prepared for that meeting. This agenda would 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 (exhibit P-6);
41. On July 17<sup>th</sup>, I sent out a notice for an EC meeting for July 24<sup>th</sup>, with a proposed agenda taking into consideration the many concerns expressed by member locals. The proposed agenda included the following matters : ratification of new local representatives, operating budget 2007-2008, request for Special General Meeting, Quebec organiser job description; email being produced as exhibit D-2;
42. On July 18<sup>th</sup>, 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 Mr. Altalibi 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-9);
43. Attached to the aforementioned email was another email from Amanda Aziz, chairperson of CFS-National, stating that the representative of the SSMU was eligible for CFS-Q election since there is no " prospective membership " fee for CFS-Q;
44. On July 21<sup>st</sup>, I received an email from Ms. Shanice Rose, DSU VP Finance, claiming that she was the person to contact concerning relations between DSU and CFS-Q;

45. On July 23<sup>rd</sup>, I received an email from a DSU staff person, Ms. Arielle Reid, and another from Mr. Charles Brenchley, President of the CSU, basically repeating the content of Ms. Rose's email about DSU representation at CFS-Q (exhibit P-11);
46. A few minutes later, I received an email from Ms. Malamo Beaumont Savvas, DSU VP External Affairs, claiming that she had been unfairly stripped from her mandate of representing the DSU at CFS-Q and that I should recognise her as the official representative. She explained that the motion adopted on June 20<sup>th</sup> by the DSU Executive Committee was not valid since there was no quorum at that meeting and therefore it had no legal standing, email being produced as exhibit D-3;
47. In the morning of July 24<sup>th</sup>, I sent an email to Ms. Angelica Novoa, President of the CSU, requesting a copy of the formal resolution of the CSU EC demanding for a SGM, as required by CFS-Q by-laws (exhibit P-10);
48. The members of the EC of the CFS-Q arrived at 4:00PM, July 24<sup>th</sup>, at the CFS-Q office;
49. As Ms. Beaumont Savvas was arriving at the office, a group of around four (4) people, whom I assumed were Dawson students, were blocking the door to prevent her from going in and yelling at her that she had no right to be there;
50. I went to see them and told them that everybody was welcome to attend the EC meeting and that no one should be prevented from doing so;
51. I asked Mr. Altalibi to stay near the door to prevent any harm from being done to Ms. Beaumont-Savvas;
52. After almost an hour, the group and Ms. Beaumont Savvas finally entered the office;
53. In the meantime, and still before the meeting began, the CSU VP Communications, Mr. Noah Stewart and CSU President, Ms. Angelica Novoa, tried to convince the other representatives of member locals to boycott the meeting, claiming that Mr. Altalibi and I were not legitimate members of the CFS-Q EC and that no EC meeting should be held until a SGM was held to resolve this question;

54. Ms. Novoa presented a letter signed by herself to justify her request calling for a SGM, claiming that she had the power of the Council under the CSU constitution;
55. Some of the local representatives pointed out that under the CFS-Q by-laws, a resolution from the Council should be presented, and not an equivalent;
56. I suggested that these subjects be discussed during the official EC meeting that was to be held within a few minutes;
57. The CSU representative decided to boycott the meeting and left the office ;
58. The EC meeting started at around 5:00PM, I chaired it and the proposed agenda was followed;
59. Throughout the EC meeting, there was ratification of each local representative, as an official delegate of their Student Association;
60. When came the time to ratify the DSU representative, there was a conflict between Ms. Beaumont-Savvas and Ms. Rose;
61. I suggested that the ratification of the DSU representative be done at the next meeting, when things would be much clearer about who is the legitimate representative for DSU;
62. As per said agenda, we moved on to the approval of the Budget, presentation of the Campaign proposal and job description of staff person;
63. With respect to this last point, a resolution was passed to adopt a new job description of the Office Manager;
64. This new job description led to the termination of Mr. Soule's job contract;
65. The EC adopted a resolution to form a Hiring Committee;
66. Also at that meeting, it was decided that another EC meeting would be held on August 2<sup>nd</sup> and a SGM on August 3<sup>rd</sup>, the minutes of this being produced as exhibit D-4;
67. On July 26<sup>th</sup>, I sent an email announcing the August 2<sup>nd</sup> EC meeting. The proposed agenda included the following matters: Ratification of local representative, Progress Report of Hiring Committee, Revised Budget 2007-2008, Full Campaign Guide (exhibit P-13);

68. On July 27<sup>th</sup>, I received an email from Ms. Novoa addressed to me and to all local members, where one can read, referring to the SGM of August 3<sup>rd</sup>:

"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."(exhibit P-15);

69. On July 30<sup>th</sup>, I sent an email announcing the August 3<sup>rd</sup> SGM. The proposed agenda included the following matters : Approval of the Agenda, Approval of the Budget, Approval of the Campaign Guide (exhibit P-16);

70. After I sent the email for the SGM for August 3<sup>rd</sup>, I received at least three (3) phone calls from Mr. Noah Stewart, CSU VP Communications, who was expressing his disapproval of not adding Ms. Novoa's motion to the SGM Agenda;

71. I sent out an email to clarify my position on that issue in which I invited the unsatisfied local members to present a motion during the item "Approval of the Agenda" to add these subjects to the SGM agenda (exhibit P-17);

72. I received another phone call from Mr. Stewart after the email was sent. He started threatening that he was going to sue me for not following the CFS-Q By-laws. He specifically asked me for my home address to send me a legal letter. I told him that I would not give him anything and if he had concerns about anything, he should bring them to the SGM;

73. On August 2<sup>nd</sup>, the EC meeting took place at the CFS-Q office;

74. Before the meeting began, Mr. Stewart and Ms. Jabouin (CSU VP External and representative to the CFS-Q) claimed that they would not recognise this meeting;

75. Mr. Stewart left, although Ms. Jabouin stayed and attended the meeting;

76. We went through the agenda as it had been approved with a few changes;

77. We started with the ratification of the DSU local representative. I 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 not valid since at the time of that decision, there was no quorum;

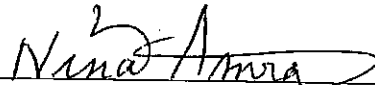
78. Once that was decided, a motion to recognise Ms. Beaumont Savvas as the representative of DSU to CFS-Q was adopted;
79. After that decision, Ms. Rose and Ms. Jabouin left the meeting;
80. Since the meeting still had quorum, we continued through the agenda (exhibit P-19);
81. On August 3<sup>rd</sup>, as the SGM started, conflict arose regarding who would be the official representative of DSU, meaning who would count as a voter at the meeting for DSU;
82. In my capacity as Chairperson, I recognised Ms. Beaumont Savvas' vote, as was decided at the August 2<sup>nd</sup> EC meeting. My decision was challenged by the representative of the CSU. I asked for a vote on my position and it passed by majority;
83. A motion for adjournment was adopted and the meeting ended;
84. After I left the meeting, I sent a registered letter to Mr. Francois Barette, our banker, telling him that Mr. Altalibi and myself were the rightful signing officers for the CFS-Q account and other people were trying to take over, and that no transfers should be done until he receives a court order to do so;
85. On August 5<sup>th</sup>, I received a phone call from a volunteer worker of the CFS-Q telling me that he was unable to access the office and that the locks had been changed;
86. On August 6<sup>th</sup>, I went to the Caisse Populaire Desjardins to make sure everything was in order. I was told by Mr. Barette that the account was frozen because there was confusion over who were the rightful signing officers. He requested a court order to unfreeze the account.
87. I went to the CFS-Q office to check on things. I and others at the office discovered that cheques and financial statements were missing;
88. Considering the seriousness of the improper behaviour of 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;
89. I have not been paid by the CFS-Q since the 19th of July, 2007 and the CFS-Q owes me \$521.00 in unpaid salary;
90. This loss of income 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 ~~12~~<sup>16</sup><sup>th</sup> day of September 2007

NAJ.

  
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NINA AMROV

Solemnly declared before me, in  
Montreal, this ~~12~~<sup>16</sup><sup>th</sup> day of  
September 2007 NAJ.

  
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#195988  
avocate

**Copie conforme**

  
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**OUELLET, NADON & ASSOCIÉS**