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A- I can't recall how long I was in -- but I was working that day, so...

140 Q- Okay.

A- I may have been working outside the office for most of the day, but I was definitely there.

141 Q- Okay.

Now, at that date -- on that date, did you know what was the concern of C.S.U. concerning the election? You can look at the e-mail, no problem.

A- As far as that exact date, I don't -- I didn't know their concerns prior to receiving the e-mail, and so as far as on that day, I don't think I knew on July fourth (4th), no. But prior to the e-mail, certainly not.

142 Q- Okay. So, at that -- on that date, you did not know what was the concern with the election?

A- No.

143 Q- Did anybody, between the twentieth (20th) of June and the fourth (4th) of July -- any -- give you any idea that they might be concerned with that election?

A- I don't recall, specifically.

144 Q- No? Okay.

You said that you were working on the

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fourth (4th) of July. Do you remember what you were doing?

A- No.

145 Q- No? But you remember that you were working?

A- Well, I know that I was back in Montreal, then, it's...

146 Q- Okay, well...

A- ... a Wednesday.

147 Q- ... a minute ago you said that you know that you were working on the fourth (4th).

A- I know that I was back in Montreal and I was definitely -- I know that I didn't take any time off that week.

148 Q- Okay, but you don't remember what work you were doing during that...

A- Not off the top of my head.

149 Q- Okay.

Okay, now, I take -- at paragraph 40, you talk about the term of Bylaw 3.3.

A- Yes.

150 Q- Okay? Now, if you look at Bylaw 3.3 that is Exhibit 2 -- go to 3.3, please.

A- Yes.

151 Q- You're saying in your Affidavit that the meeting should have been called in the following three

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(3) weeks. That's what...

A- That's correct.

152 Q- So, what you're saying, it is 3.3(b) that should
apply?

A- That's correct.

153 Q- Okay.

Okay, now in that bylaw it is said that a
resolution by the local association board of
directors directing the Executive Committee --
there has to be a resolution by the local
association.

A- And the Board of Directors, that's correct.

154 Q- That's -- now, was such a resolution shown to
you at the time?

A- No, but I think it is pertinent, and as I
explained, actually, to both Nina Amrov and...

155 Q- I'm...

A- ... to Mahdi -- no...

156 Q- I'm asking...

Me ROSELINE OUELLETTE:

Let him...

Me WILLIAM DE MERCHANT:

No -- no, no, no. No, no. I'm asking him...

Me ROSELINE OUELLETTE:

... answer the question.

Me WILLIAM DE MERCHANT:

... if a resolution was shown to him, that's what I'm asking.

A- No, what was shown to me was a request from the President from Local 91, the Concordia Student Union, and...

157 Q- No, that's it.

A- No.

158 Q- My...

Me STÉPHANE ROY:

He's allowed to answer.

A- I'm allowed to answer, because it's -- I explained this...

159 Q- If you want to play that game, we stop everything today. I won't allow my witnesses to testify in a few minutes if you don't let them answer. Okay? No, I'm...

Me WILLIAM DE MERCHANT:

Okay.

Me STÉPHANE ROY:

Okay?

Me WILLIAM DE MERCHANT:

Okay.

Me STÉPHANE ROY:

Let him answer. Because you've played that --

your game since the beginning with your attitude, I said nothing because it's not my client. You've tried -- so let him answer, okay?

Me WILLIAM DE MERCHANT:

Maître Roy, je vous demanderais...

Me STÉPHANE ROY:

Let him answer.

Me WILLIAM DE MERCHANT:

Je vais vous demander de ne pas intervenir dans le témoignage. Si Maître Ouellette veut intervenir, elle peut faire comme elle veut, mais ce n'est pas votre client, à ce moment-ci, quand on va interroger votre client, vous serez tout à fait justifié d'intervenir, mais en ce moment, Maître Roy. Je ne vois pas de quel droit vous pouvez intervenir à ce moment-ci.

Me STEPHANE ROY:

À bon droit.

Me WILLIAM DE MERCHANT:

Je ne sais pas où. Où est-ce que vous voyez votre droit de intervenir, Maître Roy?

Me ROSELINE OUELLETTE:

O.k., on va cesser cette discussion-là. On va poursuivre. Maître Roy a intervenu, je l'ai

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laissé intervenir, puis on continue.

Me WILLIAM DE MERCHANT:

160 Q- So...

A- As had been the case in previous -- in previous places with Concordia Student Union, I have seen before and I -- while I'm not conversant with their entire bylaws, I am aware of the fact that their President is allowed to make decrees which exercise the powers of the Board of Directors.

And that's what I explained to the folks in the Provincial Office, being Nina Amrov, specifically, and encouraged them to either act -- and when they expressed concerns, I told them to contact Angelica to get clarification immediately.

161 Q- Okay, you told them to contact -- then to contact who?

A- Angelica.

162 Q- Angelica?

A- The President of the Concordia Student Union.

163 Q- Okay, to the best of your knowledge, did they contact Angelica?

A- I was present for a phone call, yes.

164 Q- Okay. And what was said during that phone call?

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A- I could only hear one (1) side of it, but my understanding when she hung up was that Angelica had explained, as I just did, that she could act, and decree, and invoke the powers of the Board of Directors.

165 Q- Okay. What was -- you said that you only heard one (1) side of the conversation, but you're relating the side that you did not hear. What was said by Nina Amrov and/or Mahdi Altalibi? Which one was speaking on the phone?

A- It was Nina, and when I asked Nina...

166 Q- Okay, what did Nina ask on the other side?

A- I don't recall the content of the conversation, I do recall after she hung up I asked, "So what did she say?" And Nina explained that she -- that Angelica had said that...

Me ROSELINE OUELLETTE:

O I object...

A- ... that she had the power to exercise on behalf of...

Me WILLIAM DE MERCHANT:

167 Q- A minute ago you said that you only heard one (1) side of the story...

A- That's how telephones work.

168 Q- Yes. What did you hear? Not what you think was

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said. What did you hear?

A- I don't recall what was said during the conversation, I know -- I recall what was said after the conversation.

169 Q- Okay, perfect.

Now, following that telephone call that you heard only one (1) side -- person speaking, did you yourself contact C.S.U. to have more information concerning the problem with the election?

A- I don't recall when. I did speak to them.

170 Q- When was that?

A- I don't recall.

171 Q- Okay.

What was told at that point -- what was explained to you?

A- I raised the same concern again, verified that she could -- that the President could, in fact, decree and invoke the power of the Board of Directors, and that was confirmed, and then I expressed that confirmation to Nina and Mahdi.

172 Q- Okay. But did you learn what was their concern with the election?

A- They told me that they were still having that investigated, and they had some general

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concerns, but they didn't want to get into details right away.

173 Q- Okay, they did not tell you any of the detail at that point?

A- That's correct.

174 Q- Okay. At paragraph 44, you talk about:

"Indeed, given the seriousness of the issue, which calls into question the very legitimacy of the composition of the principal decision-making body of the CFS-Q..."

What are you talking about? What body are you talking about?

A- I guess in this case I was referring to the Provincial Executive.

175 Q- The what?

A- The Provincial Executive.

176 Q- The Executive.

What is the difference between a fundamental making body and a principal decision-making body?

A- Maybe I didn't use the right words, but I guess "principal" -- in this case I'm referring to the day-to-day decision-making body, whereas there

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is a higher governing body which would be the
General Meeting.

177 Q- So, you say the Executive is the day-to-day?

A- That's correct.

178 Q- Okay.

At Exhibit 9 -- your Exhibit 9, okay,
there's an e-mail of Max Silverman.

A- Yes.

179 Q- When did you first see this e-mail?

A- When it was submitted as evidence. I don't
recall what date...

180 Q- Okay.

A- ... but it was after the court...

181 Q- Okay, you never saw it before that?

A- This? No.

182 Q- No, okay.

Do you know who Amanda Aziz is?

A- I do.

183 Q- Who is she?

A- She's the National Chairperson of the Canadian
Federation of Students, and the Canadian
Federation of Student Services.

184 Q- Okay. Is she right now in that post?

A- That's correct.

185 Q- The Chairperson?

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A- National Chairperson.

186 Q- Okay. Okay.

In paragraph 45 of your Affidavit...

A- Yes.

187 Q- ... you talk about an e-motion that was put forward by P.G.S.S.

A- That's correct.

188 Q- Okay, what is an e-motion?

A- Well, an e-motion is something actually that is one of the examples of one of the inaccuracies in the bylaws that are here as evidence, in that it was what was moved -- and I don't recall what date, but I do believe it was over a year ago -- to replace the phone-around motion.

189 Q- Yes.

A- And it's -- which, I guess, was just a sign of the times, it -- an e-motion is a way of having decisions made by the Provincial Executive in between Provincial Executive meetings, it allows for quicker decision-making. There's no need for five (5) days notice and that kind of thing, so it allows for quick decision-making.

190 Q- Okay. Explain to me how that works -- how an e-motion is made, how is it put forward, how is it voted on?

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A- In general -- because I don't have the bylaw in front of me, as it's not in the copy we have -- the motion needs to be put forward by one (1) of the members of the Executive Committee. It needs to be proposed, it needs to be seconded, and then each of the other -- and everybody needs to be -- all members of the Executive Committee, as well as the staff person -- so, myself -- need to be included on that e-mail.

That e-mail then gets -- everyone sees -- obviously it's moved, someone seconds it, and then people are free to either discuss, debate, ask questions, or vote, and votes can be changed back and forth.

And at the end of the seventy-two (72) hour period from when the e-motion was first sent, the motion ends, in which case, if the majority of people voted in favour, it passes. The other way that it can end is if there's unanimity in favour, not unanimity opposed, as the votes for the motion can change. But if everybody, at one point in time, has voted in favour, then it automatically ends, and then the motion moves forward.

191 Q- Okay. Now, you're saying that -- at 47, that:

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"The motion did not attain
quorum."

How is the quorum verified during an e-motion?
I don't see it.

A- Well, there's nothing actually in the bylaws
that are specific to quorum.

192 Q- Yes.

A- Our understanding in the past, and the way we've
worked around that, recognizing that difference,
is, we have just used a general quorum, so you
need at least the majority of members of the
Executive Committee.

193 Q- Okay. But an e-motion, it's an e-mail that is
sent?

A- That's correct.

194 Q- How is the quorum verified?

A- By people who vote.

195 Q- Okay.

A- As I said, people need to vote on the motion.

196 Q- Okay.

Okay, so by saying that the e-motion did
not attain quorum, it means a majority of the
Executive did not vote?

A- That's correct.

197 Q- Okay. That's how it -- okay.

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Now, this e-motion was put forward by Nassim -- by P.G.S.S. Now, you're conversant with the bylaws, you're also a person that's been in a number of meetings, does -- by putting forward a motion, does that automatically mean that you're for or against that motion?

A- No.

198 Q- No? You can put a motion forward and not be for it?

A- That's correct, once a motion is moved and seconded, it belongs to the table.

199 Q- Okay. Now, you're saying in the -- your Affidavit that:

"The said concerns were not limited to C.S.U.."

How do you get that feel?

A- Roland later sent an e-mail that said -- after Justin seconded it, Roland sent an e-mail saying "Obviously, I'm in favour."

200 Q- Okay, he sent -- okay, you never put it forward, that e-mail?

A- I don't -- I'm not sure if it's a part...

201 Q- Okay.

A- ... of that, or...

202 Q-U Could you give us that e-mail, Madame...

Me ROSELINE OUELLETTE:

Yes. So Undertaking 1 -- number 1.

Me WILLIAM DE MERCHANT:

203 Q- Okay, on the eighteenth (18th) of July, did you believe that Amrov and Altalibi were still your employer?

A- No, at no point was I completely clear on their position.

204 Q- Well, before the fourth (4th) of July, I guess you were?

A- No.

205 Q- But you said you had no concern on their election, previously.

A- Oh, okay. Sorry. Yes. I mean, once the concerns were raised -- sorry, I got the dates confused.

So, once concerns were raised, I wasn't clear where we were standing and how the majority of the Executive members wanted to proceed.

206 Q- But you did not know what was the concern on the fourth (4th) of July?

A- Exactly. But I don't work just for members at large, I work for the Provincial Executive Committee.

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207 Q- Okay. Did anybody tell you that they were not
your supervisor or your boss before -- I don't
know when?

A- Well, it was the e-mail that asked that no
transfer of power or nothing move forward, so I
assumed that -- I understood then that there was
some concerns that needed to be raised, and it
wasn't my -- and I was -- when I inquired about
those, as I said, I was told that they were
still getting those details worked out.

208 Q- Okay.

A- So, I was operating -- and trying to cooperate
as much as I could with Nina and Mahdi, but I
wasn't entirely sure on how the structure sat.
Nor had I been informed of a new members
relations -- or staff relations officer with --
whom I should be contacting, and I expressed
some concern about that.

209 Q- Okay. When did you -- when were you informed of
the position concerning their election -- that
they were from prospective members, and
prospective members were not allowed to be
members of that large -- not be -- not allowed
to be elected, at large members? When were you
informed of all of this?

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214 Q- You're saying that you were still collaborating with Nina and Mahdi. When did you stop collaborating with them?

A- After the July twenty-fourth (24th) meeting, I was informed that they no longer wanted to employ me, and so at that point I quit being in contact with them.

Up until that point, I had tried several times to help inform them on the organization, and answer their questions, and to make suggestions that I thought would move things forward, such as, for instance, contacting Angelica early to solve their problems. And they had shown some resistance to that, and so I started to see that perhaps they didn't want to cooperate with me, but I still came to work and tried to move forward.

215 Q- Okay. So, you stopped collaborating with them on the twenty-fourth (24th) of July, that's what you're saying?

A- After the meeting, at which point Mahdi told me that it was his position that I was no longer employed.

216 Q- Yes. Okay.

Now, if you look at P-10 -- Exhibit 10,

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excuse me, this -- when were you shown for the first time that e-mail?

A- On the twenty-fourth (24th). It's also my understanding this e-mail was sent on the twenty-fourth (24th) of July.

217 Q- Okay. Now, in this e-mail, you say -- it is written:

"This resolution must be signed by the Secretary of the Board. I'm asking you this since we are going to discuss your S.G.M. request this afternoon at the Exec. meeting..."

Okay, so...

Me ROSELINE OUELLETTE:

At which paragraph, Maître?

Me WILLIAM DE MERCHANT:

The first paragraph.

Me ROSELINE OUELLETTE:

Okay. But you refer to the paragraph of the Affidavit?

Me WILLIAM DE MERCHANT:

No, I'm talking about Exhibit 10. Okay, the first paragraph:

"I just want to remind you to

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please bring a copy of the resolution to your local board of directors, to the CFS-Q Executive meeting this afternoon."

Okay?

218 Q- Isn't that what the wording of Bylaw 3.3 says, that there has to be a resolution of the local board of directors?

A- On reading it, it says nothing about a motion signed by the Secretary of the Board.

219 Q- But the first part? "Resolution of your local board of directors."

A- That's what the wording is, yes.

220 Q- Of the Bylaw...

A- Yes.

221 Q- ... 3.3? Yes, okay.

So, why would you say in paragraph...

Me ROSELINE OUELLETTE:

Okay...

Me WILLIAM DE MERCHANT:

222 Q- So, in paragraph...

"That this request..."

Me ROSELINE OUELLETTE:

At which paragraph?

Me WILLIAM DE MERCHANT:

52.

"That the request was a gratuitous violation of the principle of indoor management of moral persons."

A- I'm sorry, you said 51?

223 Q- 52.

A- Oh. Well, when we first got the e-mail on July fourth (4th), is when I suggested that Nina seek the information, and she expressed no interest in doing that, except also expressed concern why they would suggest that her statement would be enough.

And I said that my -- I explained my understanding that they're bylaws, and told that she should -- and told that she should contact them herself, if she didn't take my word for it.

And it was my understanding -- and it's simply an interpretation of what I see, but when you wait twenty (20) days, until the day of a meeting, to ask for something, then clearly what you're trying to do is -- you're not taking your moral authority in taking that question

seriously, you're obviously giving -- trying to not actually have an answer ready in due time, and not have -- a solution that might not be in your favour.

224 Q- Wasn't there a telephone done on the fourth (4th) of July to Angelica Novoa, you said a while ago?

A- Yes, and, again, it was my understanding from what Nina told me that Angelica confirmed what I had said, was that the President was able to act on their behalf.

225 Q- Okay.

A- Or, sorry, invoke the powers.

226 Q- Before the meeting of the twenty-fourth (24th) of July, did you speak with anybody at C.S.U. to try to obtain such a resolution?

Me ROSELINE OUELLETTE:

O ~~Objection, it's irrelevant.~~

Me WILLIAM DE MERCHANT:

On est en plein dedans, là. It's irrelevant?
En tout cas...

Me ROSELINE OUELLETTE:

He's not the person who has to make this decision, he's an employee.

Me WILLIAM DE MERCHANT:

Oui, mais un employé peut, c'est avec sa
procédure qu'il peut...

Me ROSELINE OUELLETTE:

Non.

Me WILLIAM DE MERCHANT:

It's irrelevant, tout ça, là?

227 Q- At paragraph 54, you say that you were not
present throughout the entire July twenty-fourth
(24th) meeting. Was there any motion that was
passed before you went out?

A- Yes, the first three (3), as listed in the
paragraph 54.

228 Q- Okay, the first three (3). Who was taking the
minutes then?

A- I was.

229 Q- You were. Okay.

And why did you go out?

A- Because they started to discuss -- the initial
discussion was around -- not my employment, but,
rather, the position in general...

230 Q- Yes.

A- ... and the terms of reference of my position,
and it got to the point where it was clear that
what was actually -- and what the intent of this

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conversation was -- and, as I stated in the meeting, the intent of the conversation was to actually discuss my employment, and at that point Max Silverman suggested that we -- that they go in camera.

And I have participation rights in all meetings, even if they go in camera, except when talking about staff relations. So, that's when I was asked to leave.

231 Q- Okay.

So, the point 4 was discussed while you were not there, that's what I gather?

A- That's correct.

232 Q- Okay. You were not there.

So, when you were -- you're saying that you were not there the twenty-fourth (24th) of July -- on top -- the beginning you refer to 4 and 5.

A- Yes, and there was an initial discussion at some point about 5, but the motion -- there was no resolution passed.

233 Q- But you were not there?

A- There was no resolution passed while I was there, so...

234 Q- Okay. Okay. Now, it is said in 4:

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"My employment as CFS-Q organizer was terminated, at least according to the information provided to me verbally by the Defendant Altalibi after the said meeting."

Okay, what does that mean, "At least according to the information..."

A- Well, again, at that point I did understand -- it had been made very clear that day, throughout a long discussion in the meeting prior to -- or in the office prior to the meeting starting, that there was some grave concerns, and that people didn't want to move forward with transfers of power.

I wasn't clear on -- I expressed some concerns also around the new elections of members of the Provincial Executive Committee from local representatives, because although I had provided Nina with the proper documents that we use generally for forms to have people nominated and have it clear who's nominated from each member local association, she had chosen not to distribute those, so I wasn't clear if

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the actual decisions had been made at, for instance, Local 79 -- or, sorry, at P.G.S.S., or at the G.S.A., or even at the C.S.U., to actually ratify people to be sitting on the Provincial Executive Committee.

It had been made clear by members of the C.S.U. that they didn't want anybody on, but they went ahead and added people, but -- that the meeting went ahead and added people anyway.

I was concerned about everything that happened at the meeting, even while I was there, and I also -- since I hadn't seen anything in writing, and hadn't had time to consult, even myself -- or even really seen a writing on this position, all I had was the word of Mahdi telling me that I was terminated.

235 Q- Okay.

Now, as I understand from the minutes of this meeting, C.S.U. was not present at that meeting, am I right?

A- As I recall, they left before the meeting started.

236 Q- Yes. Who was present at that meeting, do you remember? You've got the minutes in...

A- Yes, I can look.

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237 Q- ... P-11. No, not P-11, excuse me. Well, they're in mine, but not in yours probably. But you recall who was there? Okay, so...

A- I wouldn't want to say for sure an exhaustive list, but -- so once the meeting was called to order, at the beginning there were a few members of the Dawson Student Union -- individual members unknown to me -- their staff person at the time, Ariel Reid. And they were off to the side. I believe Shanice Rose was there at the time. Patrice Blais, Roland Nassim, Max Silverman, Mahdi Altalibi, Nina Amrov, myself -- so Roland Nassim, Patrice Blais, Max Silverman, Mahdi Altalibi, and Nina Amrov, and myself for sure, and I don't recall -- Malamo Beaumont had been there for a while, I don't recall if she sat down at the table with us. Again, that would be in the minutes, though, so I'm okay with -- I'm comfortable with whatever the minutes say. Because I have reviewed those things.

238 Q- Now...

A- And then, sorry, the last thing is, I do recall for certain that Malamo was not there by the end.

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239 Q- Who?

A- Malamo Beaumont.

240 Q- Okay.

A- And nor -- neither -- no one from the Dawson Student Union was at the meeting by the end of the meeting, by the time I was asked to leave, and when I came back they were not there.

241 Q- Oh, you came back to the meeting?

A- After the meeting had adjourned, that's when I was informed verbally.

242 Q- Okay, by...?

A- By Mahdi.

243 Q- Okay.

Now, isn't it true that Mahdi asked you to give back your keys then?

A- He asked for the keys, yes.

244 Q- Yes.

A- And I said that having -- not having anything in writing, having not been paid in, at that point, over a month, because of all the concerns, I agreed with Nina's request to not write any cheques, so I hadn't even -- I still have yet to be paid since, I believe the end of May, perhaps the beginning of June.

So, throughout that time, I said -- like,

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"There's a significant amount of back pay you owe me, plus my contract, if, in fact, I am terminated, allows for severance." Not significant, it's six (6) weeks, but there's still severance.

I had a telephone, a vacuum, all of which I wasn't ready to pick up and carry under my arms, so I assured him that there was plenty of reasons why I wasn't going to run off with the keys, and that once we'd have a more formal discussion and I was satisfied that I was terminated, and that everything -- all my rights were respected, then I would give the keys back.

245 Q- Okay. So, because they were not paying you, you did not have your -- a letter by writing, and because they were not paying you, you did not receive nothing by -- you didn't have a severance pay, you did not want to give back your key?

A- For all the reasons I've listed earlier.

246 Q- Yes, okay. Okay.

Now, you went in the office the next morning?

A- I did.

247 Q- What time did you go in?

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A- It was about eight thirty (08:30). 1

248 Q- Okay. On what right were you going there? 2

A- Well, I had realized that I had forgotten -- if 3
you know a SIM card for... 4

249 Q- Yes. 5

A- This is my personal telephone, it's -- but I'd 6
left my personal SIM card in the office phone, 7
just in storage, and I realized that that was 8
there. And I wasn't sure how long it was going 9
to take for someone to get back to me, so I -- 10
my intention was to grab that. I also realized 11
I didn't have my headphones for my iPod. 12

So, on the way -- I was going to go out of 13
town for the day, and on my way out of town I 14
just wanted to grab those two (2) things. 15

250 Q- Why didn't you phone Mahdi and ask him for... 16

A- Because it was early, and I didn't want to 17
disturb him, and I knew that I -- I knew that 18
they had an idea of what was in the office, and 19
I had no intention of doing anything that I 20
considered to be problematic, so I just wanted 21
to grab my things and be on my way. 22

251 Q- Okay. And what happened when you got there? 23

A- Fahr Marouf was in the office -- had been 24
smoking, and from what looked to be -- clearly 25

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moment?

A- No.

257 Q- Why was that?

A- Because I know Fahr to not be a member of any member local, and I expressed some concern at him being in the office, but didn't want to engage in any kind of a physical altercation, and I know that -- my understanding is that there is a history of that with him, and I didn't want to get involved in that. So, after -- so, I just left.

258 Q- So, you did not want to give your key to somebody that you did not know?

Me ROSELINE OUELLETTE:

O ~~Objection. On the same -- objection.~~

Me WILLIAM DE MERCHANT:

259 Q- Following that, did you offer to give back your key to Mahdi or Nina?

A- I was never contacted by them again, until I saw Mahdi the night that we changed the locks. November the eighth (8th), or whatever that was. I'm sorry, contacted -- I was never phoned or asked for the keys.

260 Q- On July twenty-sixth (26th)...

A- Sorry, which paragraph are you referring to --