

C A N A D A  
PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL  
N° : 500-17-038173-079

S U P E R I O R C O U R T  
FÉDÉRATION CANADIENNE DES  
ÉTUDIANTES ET DES ÉTUDIANTES  
ÉLÉMENT DU QUÉBEC

Plaintiff

-vs-

NINA AMROV  
-and  
MAHDI ALTALIBI

Defendants

-and-

MALAMO SAVVAS-BEAUMONT  
SOSHIMA VERA-CADET  
MELANEE THOMAS, ET AL

Mises en cause

EXAMINATION ON APPEAL OF SOSHIMA VERA-CADET

APPEARANCES:

**Me ROSELINE OUELLETTE**

for Plaintiff and Mises en cause (S. Vera-Cadet, M. Thomas, R. Nassim, E. Jabouin)

**Me WILLIAM DE MERCHANT**

**Me PIERRE-LOUIS FORTIN-LEGRIS**

for Defendants (N. Amrov, M. Altalibi) and Mise en cause (M. Silverman)

**Me STÉPHANE ROY**

for Mises en cause (Concordia Student Union and Dawson Student Union)

AUGUST 31, 2007

AA070831.A4

ANITA AUZA, o.c.r.

STÉNO EXACT

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EXAMINATION ON AFFIDAVIT

SOSHIMA VERA-CADET

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In the year of Our Lord, two thousand and seven (2007), on this thirty-first (31st) day of August,

PERSONALLY CAME AND APPEARED:

SOSHIMA VERA-CADET, born the fifth (5th) day of June, nineteen hundred and eighty-eight (1988), Student, residing at six two seven five (6275) Place de Malicorne, Anjou, Province of Quebec;

WHO, after having made a Solemn Affirmation, doth depose and say as follows:

EXAMINATION BY Me WILLIAM DE MERCHANT,

On behalf of Defendants (N. Amrov, M. Altalibi) and Mise en cause (M. Silverman):

1 Q- Madame Soshima Vera-Cadet, I will be asking the questions for our side today. What -- you're the -- you were elected a Chairperson of the CFS-Q at the third (3rd) -- August third (3rd), two thousand and seven (2007). From what organization -- or local organization do you come from?

A- What do you mean, from school?

2 Q- What school, yes.

A- Concordia.

3 Q- C.S.U.?

Me ROSELINE OUELLETTE:

You have to answer out loud.

A- Yes.

Me WILLIAM DE MERCHANT:

4 Q- Okay.

So, you are an undergraduate at Concordia?

A- Yes.

5 Q- What year?

A- Second year.

6 Q- Second year, okay.

Were you ever -- did you work with the  
C.S.U. Executive beforehand?

A- Not prior.

7 Q- Not prior? Since -- were you involved with the  
CFS-Q prior...

A- Not...

8 Q- ... to your election?

A- ... prior in the organization of it, no.

9 Q- No?

A- Like, I participated in -- for example, February  
-- the election February seventh (7th), but not  
doing the organizing.

10 Q- Okay, you were in the -- you were aware of

the...

A- I took part in the events with...

11 Q- Yes, okay. Okay.

Now, when you went to the August third  
(3rd) meeting, who asked you to come there?

Me ROSELINE OUELLETTE:

O Objection.

Me WILLIAM DE MERCHANT:

12 Q- Before going there, did you receive an agenda of  
what would be present at the CFS-Q?

A- No.

13 Q- Did you know what would be discussed at that  
meeting?

A- For the meeting it would have...

14 Q- Yes.

A- ... been my nomination.

15 Q- Okay.

A- That's what I am aware of.

16 Q- Okay.

A- Anything prior to that, I don't...

17 Q- So, you knew that you would be nominated as a  
post?

A- Meaning that I would probably -- there would  
probably be an election, and that I would  
probably have a speech to be elected. But I did

not know, for sure, exactly that I was going to get elected, no.

18 Q- No, obviously.

But -- okay, who nominated you as a -- for C.S.U.?

A- C.S.U. V.P. External.

19 Q- Okay. Who is that?

A- Erica Jabouin.

20 Q- Okay, Erica Jabouin.

Okay, this was the -- again, your answer, but I want to make sure. This was the only point that you knew that was going to be discussed at that meeting?

A- Probably my nomination and my election, that's what I knew.

21 Q- Okay.

A- From my point of view.

22 Q- Okay. Now, before being named Chairperson of the Federation, had you ever been Chairperson of any organization?

A- I'm President currently of the Haitian Association at Concordia University. I am experienced in managing and organizing -- running campaigns.

23 Q- Okay, you go too fast for me. But you're the

Haitian...

A- Haitian -- R.H.C.

24 Q- R...

A- That's the acronym. R.H.C.

25 Q- R.H.C...

A- ... Canada...

26 Q- Okay.

A- ... at Concordia University.

27 Q- Okay.

A- I have prior experience running and organizing campaigns back in Boston...

28 Q- Okay.

A- ... for a national environmental campaign -- grass roots.

29 Q- So, you're versed with the...

A- Yes.

30 Q- Okay.

A- So, I have...

31 Q- Okay, now...

A- ... experience.

32 Q- ... you write in your Affidavit at paragraph 2 that you've been unable to perform your normal duty as Chairperson.

A- That's correct.

33 Q- Yes. What are your normal duties as Chairperson



that you've not been able to do since then?

A- Well, I have not been able to become situated in my role; I have not been able to write agendas and bring that to the Executive and the directors.

34 Q- Wait, you go too fast. Situated in your role...

A- Yes, I haven't been able to do anything as my duty. I haven't been able...

35 Q- Bring -- you said bring agendas...

A- To the Executive to see if that would be -- how do you say -- to see if that would be passed or not, to run -- look at the campaign guide and see what we can do for the academic year, two thousand seven, two thousand eight (2007 - 2008).

36 Q- Campaign...

A- As well as the budget. Like, I haven't been able to do anything.

37 Q- Okay. Now, again, this is my English -- what do you mean by "situated" in your role?

A- I haven't been able to -- what's another word for that -- "situated"? To become active in my role.

38 Q- Okay.

Okay, now you're saying that you haven't

been able to bring any agenda to the Executive.  
I -- maybe I got that wrong, what did you say exactly?

A- Well, not, like, just me -- like, my opinion, but it would mean -- what I mean is that I'm not able to write an agenda, fulfil my duties, and then take that to the Executive Committee and then discuss it with them, see what can be done, and what won't be done, and what should be done.

39 Q- Have you tried to call an Executive Meeting since your election?

A- No.

40 Q- Was there any Executive Meeting since the election?

A- Not to my knowledge. But that is because we are in this situation.

41 Q- Okay, was there any phone-in motions that were put forward since your election?

A- Not to my knowledge.

42 Q- As the President, what have you been -- did you do any kind of action since your election?

A- Since my election, I have not been able to.

43 Q- Okay. In your normal duty as Chairperson, what do you think is your role with the staff?

A- Can you elaborate on that? What do you mean?

44 Q- What -- you know the staff members of CFS-Q? Do  
you know who's the...

A- The directors, you mean?

45 Q- No, the staff members. The hired persons -- the  
office manager of CFS-Q, do you know who that  
is?

A- The office manager...

46 Q- Of the CFS-Q.

A- I would say, to my knowledge -- I think I'm  
aware...

47 Q- Yes?

A- ... of who that person is.

48 Q- Who would that be?

A- The office manager of CFS-Q -- well, in the past  
I -- to my knowledge, I think it was George  
Soule.

49 Q- Okay. Do you think he is still the office  
manager?

A- I don't have information...

50 Q- Okay. What has been your contact with George  
Soule since the election?

A- What do you mean "contact"?

51 Q- Did you talk to him? Did you have any...

**Me ROSELINE OUELLETTE:**

What is the date of the election you...

Me WILLIAM DE MERCHANT:

The third (3rd) of August.

Me ROSELINE OUELLETTE:

After, or before?

Me WILLIAM DE MERCHANT:

After.

A- No.

52 Q- No?

A- I didn't speak with him after.

53 Q- No contact whatsoever?

A- Not after.

54 Q- Do you know who the directors of CFS-Q are?

A- Yes.

55 Q- Could you name them for me, please?

Me ROSELINE OUELLETTE:

At what time?

Me WILLIAM DE MERCHANT:

At -- right now, on the -- at this time.

A- When I was there at the August third (3rd)  
meeting?

56 Q- No, right now, today. Today who are the...

Me ROSELINE OUELLETTE:

O I will object to this question, it's in the case  
-- it's...

Me WILLIAM DE MERCHANT:

She's saying that she's the Chairperson, she should know the directors.

Me ROSELINE OUELLETTE:

I will object.

Me WILLIAM DE MERCHANT:

57 Q- Do you know who represents Dawson?

A- D.S.U.? Currently, I believe it's Shanice Rose.

58 Q- Okay, who represents C.S.U.?

A- Currently, I believe it's the V.P. External,  
Erica Jabouin.

59 Q- Who represents G.S.A.?

A- Graduate Students Association of Concordia?

60 Q- Yes.

A- Currently, I do not know, actually.

61 Q- Who represents M.S. -- S.S.M.U.?

A- S.S.M.U.?

62 Q- Yes, excuse me.

A- S.M.U. is -- I don't know that neither...

63 Q- No, you don't.

A- ... if that's...

64 Q- Okay. Now, P.G.S.S.?

A- P.G.S.S., is Roland. Roland.

65 Q- Yes? Roland...?

A- Roland -- Roland Nassim.

66 Q- Okay. Now, you're saying that:

"The actions..."

Paragraph 3 of your Affidavit.

A- Right.

67 Q- "The actions of Nina Amrov and Mahdi Altalibi... sympathetic to them, that I'm aware of, include occupying the office of CFS-Q, changing the lock of the door, and communicating with our financial institution, claiming to be the rightful signing officers of the CFS-Q, resulting in a freeze."

Now, to the best of your knowledge, who were the persons that did some occupying the office of the CFS-Q?

A- To the best of my knowledge...

68 Q- Yes.

A- ... it was Nina, Mahdi, and people sympathetic to them.

69 Q- But you don't know who? Or do you know...

A- Not specifically, no.

70 Q- No. Okay.

Nina, Mahdi and other persons? Is that

what you said?

A- And entourage.

71 Q- Eh?

A- And entourage.

72 Q- And entourage, okay.

Now, you're saying "and changing the lock on the door." What date are you implying that there was -- or are you saying that there was a change...

A- I'm not implying a specific date.

73 Q- No, no -- okay.

A- I'm implying that I do have some knowledge that there was -- there was a problem with the locks -- not a problem with the locks, more that Mahdi and Nina changed the locks, and then it was changed again, and then changed again, and there was this change-around game, but I'm not aware...

74 Q- Okay.

A- ... not so much of...

75 Q- Since...

A- ... specific dates, nor was I there.

76 Q- Okay, I'm cutting you off, and I'm sorry on this, okay?

A- Okay.

77 Q- Since the fourth (4th) of August, do you know  
how much times the locks were changed?

A- I can estimate.

78 Q- Yes.

A- About four (4) or five (5) times, to my  
knowledge, I'd say.

79 Q- Four (4) or five (5) times to the best of your  
knowledge, since the fourth (4th) of July --  
August?

A- I can estimate it.

80 Q- Since the fourth (4th) of August -- I'm sorry,  
I asked since the fourth (4th) of July.

A- Oh, I'm sorry.

81 Q- No, I said fourth (4th) of July -- I'm asking...

A- Okay.

82 Q- ... since the fourth (4th) of August.

A- Fourth (4th) of August? I'd say three (3).

83 Q- Three (3)?

A- I'd estimate at two, three (2 - 3). I don't  
know...

84 Q- Okay.

A- ... prior, because I wasn't there, and I don't  
have that specific information that you're  
asking for, but I can estimate that it was  
changed a few times.



85 Q- Okay. Did you -- as a Chairman, did you ever  
inform anybody to have the change -- the lock  
changed?

A- Not to my knowledge.

86 Q- No. Okay.

You're saying that Nina and Amrov -- Nina  
and Mahdi -- Nina Amrov and Mahdi Altalibi  
communicated with your financial institution,  
claiming to be the rightful signing officers.  
When was that done, to the best of your  
knowledge?

A- It was done early August. It's about a couple  
of days after my election.

87 Q- Okay. Did you, yourself, communicate with the  
bank?

A- I did not communicate with the bank myself, no.

88 Q- Who told you that?

A- I was informed.

89 Q- By whom?

A- I was informed by C.S.U.

90 Q- And C.S.U. is a moral person...

A- I was informed by C.S.U. V.P. External.

91 Q- And that would be...?

A- That would be, as I said, prior -- before --  
Erica Jabouin.

(DISCUSSION OFF RECORD)

Me WILLIAM DE MERCHANT:

92 Q- So, I might ask a question that I asked before.

Yourself, did you communicate with the financial institution?

A- No.

93 Q- That was asked, eh?

A- That was asked.

94 Q- Okay, bon.

Did you sign any papers that were to be handed to the bank? Any change -- any form to the bank?

A- No.

95 Q- No. Okay.

Now, at paragraph 5, you say to this end:

"The CFS-Q has retained the services of the firm of Ravinsky, Ryan LLP to represent CFS-Q in this matter, and to my personal knowledge, the following directors have informed me that the directors agree with this decision, namely..."

And you name a certain amount of persons.

A- Okay.

96 Q- Was there a formal meeting called to discuss  
this point?

A- A formal meeting to -- you have to elaborate --  
to discuss...

97 Q- To retain the services of the firm of Ravinsky,  
Ryan.

A- The decision wasn't me, just by myself.

98 Q- When was it made? How was it made?

A- That, I don't have specific knowledge on, but I  
know it was made -- it was -- we had consensus  
on it.

99 Q- How did -- did you meet together to get that  
consensus?

A- Like, did we conduct, like, a General Meeting...

100 Q- Yes.

A- ... to specifically do -- to specifically get  
this recommendation?

101 Q- Yes.

A- Not a General Meeting, no.

102 Q- No? So, how was -- you said you got consensus?

A- Consensus.

103 Q- How was that consensus reached?

A- It was agreed upon.

104 Q- How?

A- By myself and all the other directors.

105 Q- How were...

A- The directors specifically.

106 Q- How were you informed that they were -- that they were in agreement?

A- I was informed, also, again, by the C.S.U. -- I was informed on the day, of course, that -- the day that we had a meeting.

107 Q- The day that you had a meeting?

A- Like, there was no General Meeting to go. But I remember on the day that I came here was to meet and to get my version of what happened, like, August third (3rd), and...

Me ROSELINE OUELLETTE:

O ~~Objection, privileged.~~

(DISCUSSION OFF RECORD)

Me WILLIAM DE MERCHANT:

108 Q- You said that you came to a meeting here. Who told you to come here?

Me ROSELINE OUELLETTE:

O ~~Objection.~~

Me WILLIAM DE MERCHANT:

109 Q- Now, was there -- to the best of your knowledge,  
was Max Silverman ever called on this subject?

A- Not to my knowledge. I do not know.

110 Q- No. Do you know who Max Silverman is?

A- A representative from S.S.M.U., is that not  
correct?

111 Q- Okay, was he ever informed of that meeting?

Me ROSELINE OUELLETTE:

O I will object because it's not in the Affidavit.  
It's not in the Affidavit.

Me WILLIAM DE MERCHANT:

"CFS-Q has retained the services", who is CFS-Q,  
if it's not the director?

Me ROSELINE OUELLETTE:

CFS-Q -- all the persons are on the Affidavit.

(DISCUSSION OFF RECORD)

Me WILLIAM DE MERCHANT:

112 Q- Okay, so when you're writing that "CFS-Q has  
retained the services..." -- who retained the  
services of the firm?

A- Those mentioned in paragraph 5.

113 Q- Okay.

Okay, so you know that Erica Jabouin, Melanee Thomas, Roland Nassim, Justin Levy and yourself retained the services of Ravinsky, Ryan?

A- To my specific knowledge, yes.

114 Q- Anybody else?

A- Well, yes.

115 Q- Who?

A- There are others, like, Shanice Rose who came, and Brandon, and George, who's sitting here.

116 Q- Brandon? Brandon? Who's Brandon?

Me PIERRE-LOUIS FORTIN-LEGRIS:

Vergera.

Me WILLIAM DE MERCHANT:

Vergera, okay.

A- So, yes.

117 Q- Let's go back to the August third (3rd) meeting.

A- Okay.

118 Q- Who was acting as the CRO for the election?

A- Chief Returning Officer?

119 Q- Yes.

A- To my knowledge, it was Brent.

120 Q- Okay, he was acting as the Chairperson and as the CRO?

A- To my knowledge.

121 Q- Okay.

Now, were you present when Nina Amrov and Mahdi Altalibi were removed from the...

A- No.

122 Q- No, you were not present at that moment?

A- Not present.

123 Q- Okay.

Do you have, yourself, a key to the office? There was a change of key done by CFS-Q on the sixth (6th) of August -- on the fourth (4th) of August.

A- I do not have a copy of the key.

124 Q- No keys were given to you?

A- M'mm.

125 Q- Okay. Are you a signing officer of the CFS-Q?

A- To my knowledge, yes.

126 Q- Did you ever sign a cheque?

A- No.

127 Q- You said in your Affidavit that Amrov and Altalibi communicated with your financial institution.

A- That's what it says.

128 Q- Okay. Do you know if anybody from your group -- your CFS-Q group contacted the bank -- La Caisse Populaire since August fourth (4th)?

A- Since August fourth (4th)?

129 Q- Yes.

A- Not to my knowledge, no. I don't think since August fourth (4th). But I might be wrong, so I don't know.

130 Q- You don't know. Okay.

To the best of your knowledge, since August fourth (4th), did anybody of your group contact Nina Amrov or Mr. Altalibi to inform them that they were removed from the Executive?

A- Since August fourth (4th)?

131 Q- Yes. Yes, August fourth (4th).

A- August third (3rd)...

132 Q- Third (3rd).

A- ... they were removed.

133 Q- Yes, but do you know if anybody from your group contacted them to make them aware of that action?

A- I would think, yes, but I'm not the person specifically -- I don't know specifically...

134 Q- You think, but...

A- ... that they contacted...

135 Q- Yes.

A- But I would assume that, being impeached in the August third (3rd) meeting, that would be



sufficient to know.

136 Q- Were they present?

A- Pardon me?

137 Q- Were they present when they were impeached?

A- I would assume they would be.

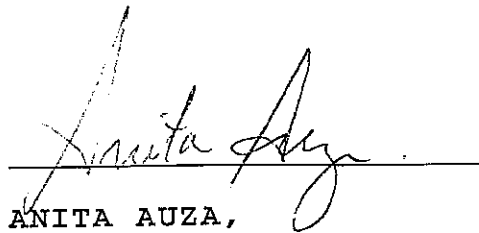
138 Q- Okay. No more questions.

**AND FURTHER DEPONENT SAITH NOT**

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I, ANITA AUZA, Official Court Reporter in the  
Judicial District of Montreal, hereby certify that  
the foregoing pages are a true and accurate  
transcript of the proceeding taken to the best of my  
skill, ability, and understanding,

And I have signed

A handwritten signature in cursive script, appearing to read "Anita Auza", is written over a horizontal line.

ANITA AUZA,

Official Court Reporter

COUR SUPÉRIEURE  
PROVINCE DE QUÉBEC  
DISTRICT DE MONTRÉAL

No : 500-17-038173-079

CANADIAN FEDERATION OF STUDENTS, QUÉBEC  
COMPONENT,

Demanderesse

c.

NINA AMROV ET AL,

Défendeurs

et

MALAMO BEAUMONT-SAVVAS ET AL,

Mis en cause

No : 500-17-038176-072

FÉDÉRATION CANADIENNE DES ÉTUDIANTES ET DES  
ÉTUDIANTS, ÉLÉMENT DU QUÉBEC ET AL,

Demandeurs

c.

GEORGES SOULE ET AL,

Défendeurs

PIÈCE D-14

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LA COUR

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