

AFFIDAVIT

I, the undersigned, Malamo Beaumont Savvas, domiciled and residing at 42 Morley Street, in the City of Greenfield Park and District of Longueuil, Québec, J4V 2Y9 do solemnly declare and state:

1. I am an Arts and Culture student at Dawson College;
2. I am a member of the Dawson Student Union (DSU) which is one of the five (5) Students' Associations that form the Canadian Federation of Students-Quebec component (CFS-Q);
3. 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);
4. On May 10th I was elected to the position of VP External Affairs of the DSU;
5. As the VP External Affairs of the DSU, it is my duty to serve as the main representative to the CFS-Q, and to any other student federation or coalition the union may join, as it appears in the by-laws of the DSU, being produced as exhibit D-10;
6. On or around the 23rd of May, I attended the Semi-annual General Meeting of the CFS in Ottawa, lasting for five (5) days, I was a delegate with Ms. Marie Vigouroux, as well as Ms. Arielle Reid, who was the staff person of the DSU;
7. For the duration of the meeting, I voted for the DSU as the VP External Affairs;
8. From June 15th to 17th 2007, I attended the 2007 Ontario Skills Development Symposium at the University of Toronto at Mississauga with Ms. Shanice Rose, VP Finance of the DSU, and Mr. Brandon Vergara, Executive Secretary of the DSU;

9. During that Symposium, in an informal meeting concerning the upcoming Semi-annual General Meeting of the CFS-Q, Ms. Rose and Mr. Vergara agreed that if any vote would come up, I would have the final DSU vote;
10. On June 19th, I attended the CFS-Q SGM;
11. During that meeting, I voted as the DSU representative and even though Ms. Reid and Ms. Rose were present, they never contested my right to be the voting representative for the DSU;
12. Throughout the meeting we discussed most of the votes, notably the election votes, and even though we did not agree on every vote that was to be taken, I understood that the final say was mine and they never contested my decision;
13. The SGM continued until the 20th of June when Ms. Rose and Ms. Reid again showed up alongside myself as the sole DSU delegate, and again I had the final vote on everything and my vote was never officially contested;
14. I received the input of both Ms. Rose and Ms. Reid on how I should vote during the meeting, but despite the fact that they disagreed strongly with some of my positions, they never contested my right to the final say;
15. Following the adjournment of the meeting, Ms. Arielle Reid went to the DSU office to prepare an emergency meeting of the DSU Executive Council (EC), for which I was never given an agenda or informed about the object of the meeting;
16. After the adjournment of the CFS-Q SGM, Ms. Shanice Rose, the VP Finance of the DSU; Ms. Erica Jabouin, the VP External Affairs of the CSU; Mr. George Soule, the staffperson of the CFS-Q; and myself, went to a meeting about the June 29th National Aboriginal Day of Action;
17. Afterwards, Ms. Rose and myself went to the DSU office to attend the emergency DSU EC meeting;
18. When I arrived at the office, I was handed the agenda for the meeting. One of the points that was going to be discussed was called 'CFS-Q Meetings' (exhibit P-18);
19. During that meeting, only four (4) Directors were present: Mr. Brandon Vergara, Executive Secretary; Ms. Shanice Rose, VP Finance; Ms. Malamo Beaumont Savvas (myself), VP External Affairs; and Mr. Ryan Solomon, VP Socio-cultural;

20. When we reached the point concerning the CFS-Q meetings, I found out that they had already drafted a resolution to strip me of my duties as VP External Affairs of the DSU (exhibit P-18 – two last pages);
21. This resolution was adopted despite the fact that there was no quorum;
22. On July 17th I received official notice from Ms. Nina Amrov about the July 24th 2007 CFS-Q Executive Committee (EC) meeting;
23. On the 23rd of July 2007, I sent an email to the CFS-Q Chairperson to inform her that three (3) DSU EC members took it upon themselves to attempt to strip me of my role at the CFS-Q and to appoint Ms. Rose, the VP Finance, instead of me for the 24th of July EC meeting of the CFS-Q;
24. On the 23rd of July, I also sent an email to the DSU EC to inform them that I was very disappointed by the personal and professional attacks of which I had been the target at the emergency DSU EC meeting held on the 20th of June, being produced as exhibit D-5;
25. Not only did those attacks cause me a lot of distress, but the way the events unfolded almost made it look like an ambush, and this I cannot accept;
26. On July 24th, I arrived at the CFS-Q office around 10 minutes before the scheduled beginning of the meeting;
27. All other Directors were already present;
28. I went to the bathroom and when I came out, five (5) people wearing DSU t-shirts were blocking the hallway and doorway, preventing me from entering the CFS-Q meeting;
29. The t-shirts that they were wearing were not available to anybody else except the EC members of the DSU;
30. All of those people had with them a copy of the email relating to the emergency EC meeting held on the 20th of June that I had sent to the EC on July 23rd;
31. Not only were they heckling me, but they were physically preventing me from entering the CFS-Q meeting;
32. I was very frightened and I felt threatened by their actions;
33. During that time, Ms. Shanice Rose came out and talked to these people without offering any kind of help to me, and even ignoring me;

34. After about ten (10) minutes, Mr. Mahdi Altalibi, the Deputy Chairperson of the CFS-Q, came out of the office to try to stop the intimidation tactics;
35. Mr. Altalibi tried to reason with them for about fifteen (15) minutes, after which he tried to help me inside the office and through the group, but again they physically stopped us from going inside;
36. In the meantime, other people came in and were not prevented from getting inside;
37. After another twenty (20) minutes of mediation by Mr. Altalibi, the group finally let me through;
38. During that meeting, as it is customary with the CFS-Q, the members of the EC should have ratified my position as the representative for the DSU;
39. Because there was so much debate over the ratification of my position, the members decided to leave it to the next meeting;
40. After that decision was made, the meeting went in-camera and I left;
41. On July 26th, I received notice that a CFS-Q EC meeting was to be held on the 2nd of August, 2007;
42. On July 30th I received notice of a Special General Meeting (SGM) to be held on the 3rd of August 2007, with this notice I received the agenda for that meeting;
43. On August 2nd I attended the EC meeting of the CFS-Q in my capacity as the DSU representative;
44. Before the beginning of the meeting, two (2) members of the CSU EC tried to convince the Directors of the CFS-Q not to hold the meeting that had been called by the Chairperson, whom they wanted to impeach;
45. Seeing that the meeting would take place anyways, the CSU VP Communications, Mr. Noah Stewart, left the premises, but Ms. Erica Jabouin, the CSU representative, attended and participated;
46. During that meeting, the EC ratified my position as the representative of the DSU;
47. During that meeting we also approved a budget and a campaign guide that were to be presented at the August 3rd SGM;

48. From the start of the meeting on August 3rd, there were heated arguments concerning my position as the representative of the DSU;
49. Ms. Nina Amrov, Chairperson of the CFS-Q, explained that I had been ratified during the 2nd of August EC meeting as the DSU representative, and that the EC had thereby rejected the DSU EC resolution appointing others as DSU delegates. She explained that I would be voting as the sole DSU delegate;
50. She explained that because I was duly elected and that the Constitution of the DSU gave me the obligation to vote on its behalf, there was no way that a resolution passed without quorum could go against the Constitution;
51. There was again a heated debate following that decision and the CSU appealed from the decision of the Chair, the outcome was that the decision was upheld;
52. The GSA representative put a motion of adjournment on the table and it was adopted;
53. After the adjournment, Mr. Brent Farrington, Deputy Chairperson of the CFS National, declared himself Chair and continued the meeting, and decided to recognize Ms. Shanice Rose, Mr. Ryan Solomon and Mr. Brandon Vergera as the DSU delegates, despite being notified by Mr. Mahdi Alfalibi that the meeting had been adjourned.
54. I then left the premises;

All the above facts alleged in this affidavit are true.

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

MBSawvas

MALAMO BEAUMONT SAVVAS

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

Isabelle Gagnon #195988
Isabelle Gagnon *avocate*

Copie conforme

Ouellet Nadon & Associés
OUELLET, NADON & ASSOCIÉS