AFFIDAVIT

- I, the undersigned, MAX SILVERMAN domiciled and residing at 2135 Beaudry in the City and District of Montréal, H2L 3G4 do solemnly declare and state:
- 1. I am a member Students' Society of McGill University (SSMU);
- I was acclaimed as VP External Affairs in March 2006 and re-elected in March 2007;
- SSMU is a prospective member of Canadian Federation of Students-Québec Component, Canadian Federation of Students (National) and Canadian Federation of Students-Services since November 16th 2006;
- 4. As a prospective member, SSMU pays 5% of what our total fees to the National would be if we were full members, as per CFS (National) Bylaws, and one sixth of all fees paid to National are returned to the Québec Component, as it appears from Bylaw I section 2(b)vi and Standing Resolution 24 of the CFS (National), exhibit D-11;
- 5. After I received the July 4th email from Angelica Novoa, president of Concordia Student Union (CSU), I at least once formally requested to Erica Jabouin, VP external affairs of CSU, to explain what the contestation of the elections was and I was told that they could not give me the reasoning until they had finished obtaining their legal opinion;
- 6. Around July 18th, after receiving the legal opinion contesting the validity of the candidacy of Mr. Mahdi Altalibi and Ms. Nina Amrov, I asked M. Boris

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Savoie-Doyer to seek legal opinion from Me Philippe-André Tessier on the subject;

- 7. About a week before the Executive meeting of July 24th, Ms. Nina Amrov informed me that she had requested a copy of the motion of the CSU's board of directors requesting a Special General Meeting and had not yet received it;
- 8. At that moment, my opinion which I expressed to Ms Amrov was that without a valid board of director's motion, we were not obligated to call a Special General Meeting in the timeframe requested by CSU;
- 9. I asked Ms Amrov to ask CSU to bring a copy of the motion to the July 24th Executive meeting;
- 10. After receiving CSU's legal opinion and before the July 24th Executive meeting, I scheduled a meeting with George Soule, CFS-Q organizer, to get his opinion on the issue of the eligibility of prospective members to the CFS-Q at-large Executive, as he had been my contact a the CFS-Q when my local association took the prospective membership and had been told we had all the rights of full members;
- 11. During that meeting, George Soule told me that, in his opinion and experience, prospective members did indeed have the right to occupy executive positions;
- 12. At the July 24th Executive meeting, CSU failed to produce a valid board of director's motion but we, as the Executive committee decided that there were enough outstanding issues to warrant a Special General Meeting which we scheduled for the 3rd of August;

- 13. Around July 30th, I received a voicemail message from Mr. Roland Nassim, from Post-graduate Students' Society of McGill University (PGSS) asking me if I knew why there was no delegates' form being distributed in preparation of the Special General Meeting (SGM), the delegates' form is produced as exhibit D-8;
- 14. I sent him a text message back stating that I didn't but I would let him know by the next day;
- 15. On the same day, I spoke to Nina Amrov, Chairperson of the Canadian Federation of Students, Québec Component (CFS-Q), who informed me that it wasn't in the Bylaws and that she didn't know where to find it;
- 16. I called Mr. Nassim the next day and left him a voice message relaying this information to him;
- 17. On August 3rd, I attended the Special General Meeting of CFS-Q held at McGill University;
- 18. The meeting began around 12:20PM, when Ms Nina Amrov, Chairperson of the CFS-Q called the meeting to order;
- Ms Amrov distributed the voting placards to the delegations, including Ms
 Malamo Beaumont;
- Immediately after, Shanice Rose, Dawson Student Union (DSU) VP Finance, went to Ms. Beaumont's seat and tried to physically remove the placard from Ms. Beaumont's hands;

- 21. Ms. Beaumont refused and Ms. Rose returned to her seat having been scolded by certain delegates for her physical attack on Ms. Beaumont;
- 22. When the meeting began, PGSS proposed a motion, seconded by Concordia Students' Union (CSU) to change the chair of the meeting to Brent Farrington;
- 23. A vote was held and the motion was rejected 3 to 2;
- 24. Mr. Noah Stewart (CSU) contested the right of Ms. Malamo Beaumont to vote in the name of the Dawson Student Union (DSU). He announced that Mr. Farrington had been elected chair of the meeting and demanded that he immediately replace Ms. Amrov as chair of the meeting;
- 25. Ms Amrov restated the result of the vote and explained that she recognised the right of Ms. Beaumont to vote in the name of the DSU;
- 26. From that moment, disorderly debates ensued, with some people challenging the legitimacy of the chair;
- 27. We argued for quite some time, during which we took at least two breaks to try to allow the DSU to solve the problem internally, but no solution could be found;
- 28. In the chaos, motions were proposed on all sides that went unheard;
- 29. There was a motion to challenge the decision of the chair to recognise Ms. Beaumont proposed by Noah Stewart (CSU);
- 30. The Chair's decision was affirmed 3 to 2;
- 31. A few minutes later, a motion to adjourn was proposed by Patrice Blais

(GSA), seconded by me;

- 32. The motion was adopted 3 to 2 and the meeting was adjourned around 2:00PM;
- 33. At that point, Brent Farrington rose from his seat and declared that he was chairing the meeting in accordance with the first motion, which he claimed had passed with a majority;
- 34. I stood up, reminded everyone that we had adjourned the meeting, and clarified that the alleged continuation of the meeting had no legal or political standing;
- 35. I read the minutes drafted by Mr. Mahdi Altalibi, and I believe that it reflects the true content of the meeting;
- 36. After the I left the meeting, I went with the other delegates who had left the adjourned meeting to the SSMU's office and helped with the writtin of the letters to the landlord and bank account manager;

All the above facts alleged in this affidavit are true.

And I have signed in Montreal, this 8th day of September 2007

MAX SILVERMAN

Solemnly declared before me, in Montreal, this 8th day of September 2007

Avocat #268001-7.

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