



*Affidavit of Lisa Coan #1
Sworn July 26, 2006*

NO. S064619
VANCOUVER REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

**MATHEW HUFF, STEVEN LEE, JOHNNY WOO and
LAURA ANDERSON**

PETITIONERS

AND:

**KWANTLEN UNIVERSITY COLLEGE STUDENT ASSOCIATION,
KWANTLEN UNIVERSITY COLLEGE, DANISH BUTT,
JATINDER (JOEY) ATWAL, JAIVIN KHATRI, HARVEY MANN,
BIKRAM GILL, DILSHAD CHEEMA, KULVIR GILL, ANDRE LESUR,
AJAY CHEEMA and AARON TAKHAR**

RESPONDENTS

AFFIDAVIT

I, LISA COAN, student, of [REDACTED], in the City of Surrey, in the Province of British Columbia, MAKE OATH AND SAY THAT:

1. I am a student at Kwantlen University College ("Kwantlen") and have been a student, and a member of the Kwantlen University College Student Association ("KSA"), since 2000. In March 2005, I was elected as a Student Representative to the Board of Governors of Kwantlen and as a Student Representative to the Board of Governors, I am automatically a non-voting member of the KSA Council for 2005-2006.
2. I have read the Amended Petition to be filed in this proceeding (the "Member Petition"), and particularly the Facts in the Member Petition (hereinafter referred to simply as the "Member Petition"). I will detail my knowledge and verification of the Member Petition in this affidavit. Where I depose that specific facts in the Member Petition are true, I have personal knowledge of those facts.

3. I have read paragraph 7 of the Member Petition and my knowledge of those facts is as follows.

- (a) I took a digital video recording of the proceedings. Attached hereto and marked as Exhibit "A" to my affidavit is an electronic copy of the video that I shot at the September SGM. This video recording is an accurate representation of the proceedings as I observed them.
- (b) Steven Lee showed me a copy of "Bill RAF2K5" when I entered the room in which the September SGM was held. Attached hereto and marked as Exhibit "B" to my affidavit is a copy of Bill RAF2K5. I am advised by Steven Lee and believe that the handwritten notes on Exhibit B were made by him.
- (c) At the September SGM, I observed the Chair of the September SGM, Aaron Takhar, refuse to allow any debate or discussion on Bill RAF2K5, despite Laura Anderson attempting to initiate such discussion: "yeah I think there's discussion over here Aaron, you gonna ignore me?" I also heard a second member request information about the motion: "I'd like to know, before we take a vote, what this is about."
- (d) As indicated on the video recording attached as Exhibit A, the Chair, Aaron Takhar, did not ever clearly state or call the question for Bill RAF2K5 or any of the motions contained in it, and the only show of hands that occurred at the September SGM, which did not appear to be a vote at all, was in response to the following question by the Chair:

"OK, before we get to what this is about, we have a lot of people here who have come for one reason, which is to win prizes, so why don't we take a show of hands first as to who is interested in reading - this has been posted for 3 weeks now so if you haven't had a chance to read this 200 page document, unless you want to read it right now, so if we can just ... have a show of hands, who wants to get to prizes? Can we have [Chair raised his arm] in favour of the motion so we can get straight to the prizes, iPods, DVDs, a trip to Mexico?"

- (e) I estimate that approximately 20 people raised their hands in response to the first question (“who wants to get to prizes?”) and 5-10 people raised their hands in response to the second question “Can we have in favour of the motion so we can get straight to the prizes, iPods, DVDs, a trip to Mexico?”
- (f) At no time during the September SGM were the motions contained in Bill RAF2K5 put to the membership or even posted on the video screen at the front of the room in which the September SGM was held. An agenda item reading “Approval of new Association Bylaws” was displayed, but there was no agenda item pertaining to the expulsion of the four members from the KSA. A motion to pass Bill RAF2K5 was posted, which read “BIRT Bill RAF2K5 be approved”, but only after the prize draw began (i.e. after the show of hands). At no time during the September SGM was the result of any purported vote posted on the video screen. No other “motion” was put to the membership and no other vote taken before the September SGM was adjourned.
- (g) I first heard about the motion to expel Laura Anderson, Steven Lee, Rigel Vincent and Kristina Kearly from membership in the KSA from Steven Lee after entering the room in which the September SGM was held. I observed no discussion whatsoever of the expulsion motion at the September SGM.
- (h) Based on my observations of the number of people in attendance at the September SGM, I do not believe that the required quorum of 250 members was achieved during the September SGM.

