



*Affidavit of Laura Anderson #3
Affirmed October 5, 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, LAURA ANDERSON, student, of #303-9460 128 Street, in the City of Surrey, in the Province of British Columbia, AFFIRM AND SAY THAT:

1. I am a Petitioner in this proceeding and a member of the Interim Council of the Respondent Kwantlen University College Student Association ("KSA") as that term is defined in paragraph 8 of the Order of Mr. Justice Bauman pronounced on August 21, 2006 (the "Court Order"). As such, I have personal knowledge of the facts to which I depose in this affidavit except where I state that my information has come from some other source, in which case I believe the facts to be true. This affidavit is supplemental to my Affidavit #2, affirmed September 22, 2006.

2. I have reviewed the unsworn affidavits of Aaron Takhar and Danish Butt provided to my counsel by counsel for the Respondents, Don Crane.

Financial Disclosure

3. With regards to Aaron Takhar's allegation that he and Mr. Butt met with me on September 1, 2006 to answer my questions about the financial state of the KSA, I reaffirm paragraphs 3 to 8 of my Affidavit #2. The only information provided to me about the affairs of the KSA is contained in paragraph 8(d) of my Affidavit #2, namely that no outside legal consultants were being used by the KSA and that the only legal matters with which the KSA was involved were the matters contemplated by the Court Order. I specifically deny that severance payments made to any staff members were discussed. I specifically deny that the cost of renovations to the Richmond Lounge and the cost of the new café were discussed. My questions (as outlined in paragraph 6 of my Affidavit #2) were not answered, but rather I was advised that the requested information would be provided to me via email or at the September 8, 2006 Interim Council Meeting. It was not.
4. At no time on September 1, 2006 did Mr. Takhar or Mr. Butt advise me of their decision to adopt a process of making financial disclosure only *in camera*. I specifically deny that, when I was Chair of the KSA, we disclosed financial information only *in camera*. While I was Chair of the KSA, Council had unfettered access to all financial information, both in Council Meetings and upon request from individual Council members. The only matters discussed *in camera* were the details of ongoing contract negotiations and highly sensitive personal information, and such *in camera* sessions were extremely rare. The membership also had unfettered access to financial information, although if copies of payroll documents were requested, detailed personal information would be redacted out prior to the copies being provided.

5. In response to Mr. Takhar's allegation that the current budget was distributed at the September 29, 2006 meeting of the Interim Council, I note that while a presentation was made by Respondent Jatinder (Joey) Atwal on the current budget at that Interim Council Meeting (which was, incidentally, a day after these motion materials were served), copies of the budget document were not distributed. Rather, Mr. Atwal gave his presentation using an overhead transparency, which was not projected, but rather read aloud by Mr. Atwal.
6. There is no way for me to know whether the information provided at the September 29, 2006 Interim Council Meeting is accurate. No supporting documentation, including the documentation required by the Court Order, has ever been provided, despite my repeated requests and the requirements of the Court Order. While I acknowledge that I have now received a copy of the "Statement of Financial Position as per 9/30/06" via email on October 2, 2006 (5 days after the service of these motion materials), that document does not show the current liabilities of the KSA (although I know from my time as Chair of the KSA that the "\$1,020,000.00 remaining on the "G" building mortgage" would more accurately be described as a liability, as it represents the outstanding principal on a loan for the purchase of real property by the KSA). I have no confidence in the accuracy of any of the financial information that has been provided to me.
7. All Kwantlen students are required to pay KSA fees, which then constitute the vast majority of the operating revenues of the KSA. These revenues exceed \$1 million annually, and the fees are collected by Kwantlen University College, which forwards these fees to the KSA in three instalments, usually in October, February and June.

New Student Vision Plan

8. With regards to the Student Vision Plan, I reaffirm the evidence at paragraph 16 of my Affidavit #2 that I was advised by Aaron Takhar on September 8, 2006 that the "Student Vision Plan" was still in draft form. I was therefore surprised to read in the unsworn affidavit of Danish Butt that the Student Vision Plan was developed over the summer of 2006, and particularly surprised to learn that he had written to Kwantlen University College regarding the Student Vision Plan on September 5, 2006, three days before I was advised at the Interim Council Meeting on September 8, 2006, that the Student Vision Plan was only in draft form. As for Mr. Butt's statement that the posters were only posted on September 14, 2006 I reaffirm my evidence at paragraph 27 of my Affidavit #2 that I saw no fewer than 30 posters posted on the Surrey Campus on September 11, 2006.
9. As for the allegation that all of the Student Vision Plan posters were taken down following the CRO's ruling on September 23, 2006, I attended on the Surrey Campus on September 26, 2006 and saw several (approximately seven) posters still posted.

Regulations

10. As for the "rough draft copy" of the Minutes of the December 2, 2005 Council Meeting attached as an exhibit to the affidavit of Aaron Takhar, I reaffirm the evidence at paragraph 8(a) of my Affidavit #2 that I was advised by Mr. Takhar on September 1, 2006 that the minutes for all meetings of Council in November and December 2005 would be provided via email to all members of the Interim Council. Prior to reviewing Mr. Takhar's unsworn affidavit this morning, I have never seen any alleged Minutes of the December 2, 2005 Council Meeting.
11. With regards to the December 2, 2005 Interim Council Meeting, I confirm that both I and Steven Lee were in attendance at the outset of that meeting and that

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