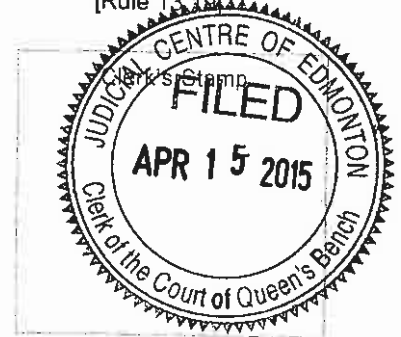


COURT FILE NUMBER 1503-03309  
COURT COURT OF QUEEN'S BENCH OF ALBERTA  
JUDICIAL CENTRE EDMONTON  
APPLICANT(S) CLAUDE COLGAN, ERICKA CLARKE,  
DARLENE MACKENZIE, KURT LUCHIA and  
STEPHEN BUDDO  
RESPONDENT(S) CANADA'S NATIONAL FIREARMS  
ASSOCIATION and SHELDON CLARE  
DOCUMENT **AFFIDAVIT**



ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT Dale Knisely  
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Phone: (780) 451-4232  
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**AFFIDAVIT OF ERICKA CLARKE**

Sworn on April 15, 2015

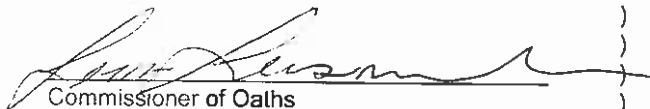
I, Ericka Clarke, a legal assistant, of Edmonton, Alberta, MAKE OATH AND SAY AS FOLLOWS:

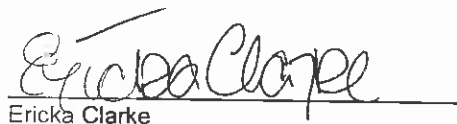
1. I am an Applicant in the within amended originating application, and a voting member and director of the Respondent Canada's National Firearms Association (hereinafter the "Association") and as such I have personal knowledge of the matters hereinafter deposed to except where my knowledge is stated to be based on information and belief. I make this my Affidavit in support of an application to resolve a dispute about questioning Ginger Fournier as a witness pursuant to Rule 3.13.
2. Ms. Fournier of Sherwood Park, Alberta, is the general manager of the Association, and has been in that role since the summer of 2011. Her job responsibilities include being in charge of the registered office and national headquarters of the Association in Edmonton and executing the day-to-day administration of the business and affairs of the Association. On a page in the Association's 2014 media kit, a true copy of which is hereunto attached and marked as Exhibit "A" to this my Affidavit, Ms. Fournier is described as the Director of Operations, but I do not recognize that title as corresponding to a role or job description in the Association.
3. I believe that Ms. Fournier has assumed responsibility for keeping, maintaining and retrieving the corporate records of the Association referred to in the amended originating application. She has general charge of the registered office where the records are required to be kept. On the two occasions that I attended the Association's registered office, she was my contact person and dealt with both of my requests for records. On the second occasion of March 25, 2015, in response to my request to inspect the register of members, Ms. Fournier displayed a computer file on a computer screen.
4. I also believe that in her capacity as general manager, she would be a first-hand witness to whether or not the by-laws were amended, either as set out in the letter being Exhibit "A" to my Affidavit sworn March 30, 2015, or at all. I am informed by the Applicant Stephen Buddo and verily believe that he saw Ms. Fournier

personally present at the 2013 annual meetings of the directors of the Association and of the members of the Association on May 3-4, 2013 at Woodstock, Ontario.

5. I also believe based on an email I received from the Respondent Sheldon Clare dated March 13, 2015 that Ms. Fournier is responsible for arranging for an auditor of the Association and an audit of the Association's financial statements.
6. I also believe that she is a witness to the matters raised in the unfiled Affidavit of Sheldon Clare sworn March 19, 2015 and produced by the Respondents as evidence in opposition to the originating application, also by virtue of her status as general manager of the Association.
7. I am informed by the lawyer for the Applicants that the lawyer for the Respondents Mr. Ken Heintz objects to the questioning of Ms. Fournier and will not produce her for questioning without a court order.
8. The Association has advertised that its annual general meeting of its members will be held in Quebec City on May 22, 2015. Myself and the other Applicants need to have the issues raised in the amended originating application resolved before the meeting commences in order for the meeting to be properly conducted. Delay in resolution of the issues raised in the amended originating application is prejudicial to the ability of the Applicants to supervise and manage the affairs of the Association.

SWORN BEFORE ME at Edmonton, Alberta, this )  
15th day of April, 2015. )

  
Commissioner of Oaths )

  
Ericka Clarke )

LEISMEISTER  
FOR OATHS  
OF ALBERTA  
APRIL 20, 2016 )

LEANE R. LEISMEISTER  
A COMMISSIONER FOR OATHS  
IN AND FOR THE PROVINCE OF ALBERTA  
MY COMMISSION EXPIRES APRIL 20, 2016

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For additional information on any  
of these plans, please contact:

**Shawn Bevins**, Executive Vice President  
1-819-313-2887 // shawn@nfa.ca

or

**Ginger Fournier**, Director of Operations  
1-877-818-0393 // ginger@nfa.ca



**CANADA'S NATIONAL  
FIREARMS ASSOCIATION**

*In defence of freedom*

This is Exhibit "A" to the Affidavit of  
Ericka Clarke sworn before me this  
15th day of April, 2015.

Commissioner of Oaths

**LEANE R. LEISMEISTER**  
A COMMISSIONER FOR OATHS  
IN AND FOR THE PROVINCE OF ALBERTA  
MY COMMISSION EXPIRES APRIL 20, 2016