

10 NOV 2010 10 50

BB1293106

Above area for LTO use only
 LAND TITLE ACT: FORM 17
 (Section 151, 152(1); 220)

NOTE: Before submitting this application for interests under (1) and (2), applicants should check and satisfy themselves as to the tax position, including taxes of the Crown Provincial, a municipality, and improvement, water and irrigation districts.

NATURE OF INTEREST: (1) ☐ FEE-SIMPLE

HEREWITH FEES OF: (2) ☒ CHARGE Judgment

\$30.05 (3) ☐ CANCELLATION OF CHARGE:

AS TO (1) AND (2):

HER MAJESTY THE QUEEN IN RIGHT OF CANADA
 IN THE MATTER OF THE EXCISE TAX ACT OF CANADA

(For purposes of litigation, Her Majesty is represented by:
 Attorney General of Canada, Department of Justice
 900-840 Howe Street, Vancouver, B.C. V6Z 2S9)

bw 11/10/2010 11:08:57 AM 3 2
 Judgement 1 \$30.05

AS TO THE FULL INTEREST OF:
 682202 B.C. LTD., INC. NO. 682202
 3 -11711 No.5 Road
 Richmond, BC V7A 4E8

This is Exhibit DD referred to in the affidavit of
MARK KATZ sworn (or affirmed)
 before me on [dd/mm/yyyy]

LEGAL DESCRIPTION OF LAND:

Municipality of Mission

PID: 017-490-146

Lot A Section 20 Township 17 New Westminster District Plan LMP1741

APPLICATION BY:

E. YEE
 SECTION 462-15 - REVENUE COLLECTIONS
 CANADA REVENUE AGENCY
 VANCOUVER TAX SERVICES OFFICE
 C/O 9755 KING GEORGE BOULEVARD
 SURREY, BC V3T 5E1
 TEL: 604-691-4419, FAX: 604-691-4991

SIGNATURE OF AUTHORIZED AGENT
 JODIE MAHOVLIC - LAND TITLE CLERK
 CANADA REVENUE AGENCY
 VANCOUVER TAX SERVICES OFFICE
 C/O 9755 KING GEORGE BOULEVARD
 SURREY, BC V3T 5E1
 TEL: (604) 691-4479, FAX: (604) 691-4081

A Commissioner for taking Affidavits
 within British Columbia
 Ontario

s-document		ETA-744-10	
FEDERAL COURT COUR FÉDÉRALE			
Aug 31, 2010			
Robert Gravelle			
Ottawa, ONT		2	

Court File No.: ETA-744-10

FEDERAL COURT

In the matter of the *Excise Tax Act*, R.S.C.,
1985, c. E-15,

- and -

In the matter of an assessment or
assessments by the Minister of National
Revenue under the *Excise Tax Act*, against:

682202 B.C. LTD.
3 - 11711 #5 Road,
Richmond, British Columbia.
V7A 4E8

CERTIFICATE

I certify that on the 31st day of August in the year of Our Lord Two Thousand and Ten, a
Certificate, that is deemed to be a judgment of this Honourable Court, was registered in this
Honourable Court,

**for One Million Two Hundred Sixty-nine Thousand Nine Hundred Seventy-five Dollars
and Seventy-one Cents (\$1,269,975.71)**

plus penalty and interest at the rate prescribed under the *Excise Tax Act* applicable from time
to time, compounded daily, are payable on the amount of \$1,269,975.71, from the 19th day
of August, 2010, to the day of payment, and that no satisfaction of the Certificate or any part
thereof appears of record in this Court.

Dated this 31st day of August in the year of Our Lord Two Thousand and Ten.

GST-309(E)-1
Rev. 98-04
(dw)


Federal Court

ROBERT GRAVELLE
REGISTRY ASSISTANT
ADJOINT AU GREFFE



Tax Services Office
Surrey BC V3T 5E1

December 16, 2010

ATTENTION: LEGAL SERVICES DEPARTMENT
1397225 ONTARIO LIMITED
SUITE 300
5650 YONGE STREET
TORONTO ON M2M 2H5

Dear Sir or Madam:

Re: Registration against (Lot A Section 20 Township 17 NWD Plan LMP1741) PID # 017-490-146, MORTGAGE # BB465267 and BB465270

In accordance with Section 28 of the Property Law Act, RSBC 1996, c.377, we hereby provide you with notice in writing of the registration of a judgment in favour of Her Majesty the Queen in Right of Canada against the above noted property. A copy of the registration and the judgment are enclosed with this letter.

Please be advised that any future advance of funds made under mortgage# BB465267 and BB465270 is subject to the CRA's above-mentioned registration.

If you have any questions regarding this letter, please contact E. Yee at (604) 691-4419.

Yours truly,

E. Yee
Collections Officer

c.c.: 682202 B.C. LTD.



Canada Revenue
Agency

Agence du revenu
du Canada

871

Vancouver Tax Services Office
c/o 9755 King George Boulevard
Surrey, B.C. V3T 5E1

682202 B.C. Ltd.
3 - 11711 #5 Road
Richmond, BC
V7A 4E8

August 20, 2010

Dear Sir/Madam:

Re: GST Account Number 868396607 RT 0001
GST/HST New Residential Rental Property Rebate
32331 7th Avenue, Mission, BC

We are currently reviewing your GST rebate application for the above noted property. In order to process the claim, we need to review the information and documentation listed below. Please mail the information to my attention within fifteen (15) days from the date of this letter.

1. A copy of an independent Appraisal Report prepared for the subject property, or if none exists, copies of the relevant working papers to support your calculation of Fair Market Value of the subject property.
2. Verification as developer that you have self-supplied the GST on the subject property.
- 3. A copy of the insurance policy on the subject property.
4. A copy of the occupancy permit issued by the city.
- 5. A copy of rental agreements for all units.
6. A short description of the facility, including any commercial space on the property, and any ancillary services provided as part of the residential agreement.

Additional information may be required after this initial review. This request is made pursuant to section 288 of the Excise Tax Act. Failure to respond may result in the cancellation of your rebate filed for the above noted property.

Yours truly,

Suzanne Cheng, Auditor
Audit Division
Vancouver Tax Services Office
Section 443-25
Tel: (604) 666-3888
Fax: (604) 666-6300

Canada

Courier to:

SECT 443-25

SINCLAIR CENTRE

CEW-02

% CRA
1166 WEST PENDER ST
VAN BC V6E 3H8

R350 E (08)



Canada Revenue
Agency

Agence du revenu
du Canada

872

Your file

Our file

April 28, 2010

682202 B.C. Ltd.
3-11711 #5 Road
Richmond, B.C.
V7A 4E8

Dear Terrence Leroux:

RE: 682202 B.C. Ltd.
(GST ACCOUNT #86839 6607RT0001)
Audit of Books and Records for the Period 2007-03-01 to 2009-09-30

Further to our audit of 682202 B.C. Ltd., we enclose herewith a Summary of Audit Adjustments to be made to your Goods and Services Tax Return(s) for the above audit period.

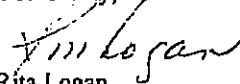
The processing of the proposed adjustments will be deferred for thirty days (from the date of the Statement of Audit Adjustments) to enable you to provide additional evidence or representations.

If you require additional time to respond or have any questions concerning the proposed changes do not hesitate to contact the writer at (604)666-3929.

The completion of our audit should not be considered as permission to destroy any books and records.

We thank you for your assistance and cooperation during our review..

Yours truly,


Rita Logan
Auditor

encl.

Canada

Vancouver Tax Services Office
Section 1227-442-28
c/o 9755 King George Blvd.
Surrey, B.C. V3T 5E1

TF690 E (08)



Statement of Audit Adjustment

873

Account Number: 868396607RT0001
Name: 682202 B.C. LTD.
Audit Period: 2006-03-01 to 2009-09-30
Date Issued: 2010-04-28
Tax Services Office: 0027 - Vancouver

Notice of Assessment Message(s)

The details of the assessment are shown on the statement of audit adjustments provided to you separately.



Statement of Audit Adjustment

Account Number: 868396607RT0001
Name: 682202 B.C. LTD.
Audit Period: 2006-03-01 to 2009-09-30
Date Issued: 2010-04-28
Tax Services Office: 0027 - Vancouver

Audit Summary of Adjustments

	Original / (Re)Assessed	Total Adjustments	(Re)Assessed Amount
2009-03-31			
GST/HST 34/62	-\$13,095.62	\$1,190,000.00	\$1,176,904.38
Total Audit Adjustments:	\$1,190,000.00		

Summary of Audit Adjustments for the Period

	Processed / Assessed Amount	Total Line Adjustments	(Re)Assessed Amount
2009-03-31			
GST/HST 34/62			
Gross GST/HST and Adjustments	\$0.00	\$1,190,000.00	\$1,190,000.00

Details of Audit Adjustments

	#	Total Line Adjustments	Adjustment Amount	ETA Reference Number
2009-03-31				
GST/HST 34/62				
Gross GST/HST and Adjustments	1	\$1,190,000.00	\$1,190,000.00	191(3)

Explanation: Self-supply on multiple unit residential complex
known as Cedarbrooke Chateau

Client: 682202 B.C. LTD. Auditor: R.M. Logan
Account #: 868396607RT0001 Date: April 22, 2010
Year End: September 30, 2009
Subject: Self - supply calculation

The property in question is a 128-unit senior's independent & assisted living facility located at 32331 - 7th Avenue, Mission, B.C. Known at Cedarbrooke Chateau.
The building was constructed between 2007 and 2009 and occupied by residents beginning in Mar-09

Section 191(3) of the ETA requires the builder to self-assess at FMV at the later of substantial completion and occupancy of the building.
When contacted by the auditor the builder's were unaware that self-assessment was required and therefore had not done so.

We are basing our assessment on an appraisal commissioned by the owners of the property for financing purposes.
The appraisal was prepared by Darla L. Seyler, AACI, P. App (copy in the file w/p 400)

The Market Value Effective date is July 15, 2009.

The Real Estate Appraisal Section of Vancouver TSO have examined the appraisal and agree that the appraised amount is reasonable for tax purposes. see w/p 420

The FMV of the property at occupancy is estimated at \$23,800,000.
We are assessing GST on that value.

GST @ 5% \$1,190,000.00 SAA



CWPC Seniors' Housing Group
A division of Carmichael Wilson Property Consultants Ltd.

July 24, 2009

Our Reference No: 8382-0509

Carlisle Capital Structures Corporation
708 – 1210 Sheppard Avenue East
Toronto, ON
M2K 1E3

Attention: Mr. Douglas Shinobu, Principal

Re: **Appraisal of "Kingsway Arms at Cedarbrooke Chateau"**
Existing 138 suite independent supportive living (ISL) Residence
32331 7th Avenue, Mission, British Columbia

Further to your instructions, we have prepared an estimate of the "as is" current market value of the existing subject property, as a going concern, reflecting 138 suites, as of July 15, 2009. The inspection of the subject property was completed May 26, 2009. The report has been prepared to assist with mortgage financing purposes only.

A full feasibility analysis, submitted separately and available upon request, has been prepared with the conclusions within the addenda of the report (Appendix "I"). The Appraiser has not contributed to the analysis or conclusions. Our Client has provided the report and instructions to the Appraiser to assume the conclusions. The feasibility concludes 26 to 33 months to reach 93% stabilized occupancy. We have adopted 4.0 units per month, or 28 months which is commensurate with the feasibility report and the on-going lease-up in place. Therefore, the estimate of market value reflects this absorption time frame and stabilized occupancy of the subject residence at the rates proposed at the effective date of valuation.

The current "as is" market value assumes hypothetical stabilized occupancy, revenue and expenses as at July 15, 2009 less the present value of the net operating income (NOI) lost during the time from actual occupancy to stabilized. The current "as is" market value is provided due to the unstable occupancy level, reflecting 16.7% occupancy, at the subject property.

As a result of our research and analysis, we are of the opinion that the current "as is" market value of the subject property, as a going concern, reflecting actual occupancy at 16.7%, effective July 15, 2009, is estimated as follows:

Twenty-Three Million, Eight Hundred Thousand Dollars
\$23,800,000

The estimate of value is subject to the assumptions and limiting conditions and the terms of reference identified throughout the report.

CWPCSeniors.com
Seniors' Housing Group
A division of Carmichael Wilson Property Consultants Ltd.

Vancouver | Calgary | Toronto
604-583-8889 | 403-995-5753 | 416-607-5545

