COURT FILE NUMBER

2401-15969

COURT

COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE

CALGARY

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT. RSC

1985, c. C-36, AS AMENDED

2401 15969 AND IN THE MATTER OF THE COMPROMISE OR AREAM CEMENT OF ANGUS A2A GP INC., ANGUS MANOR PARK A2A GP INC., ANGUS MANOR PARK A2A CAPITAL CORP., ANGUS MANOR PARK A2A DEVELOPMENTS INC., HILLS OF WINDRIDGE ASSETS INC., WINDRIDGE A2A DEVELOPMENTS, LLC, FOSSIL CREEK A2A GP FOSSIL CREEK A2A DEVELOPMENTS. LLC.

DEVELOPMENTS INC., SERENE COUNTRY HOMES (CANADA) INC.

Clerk's Stamp

CENTRE OF

DIGITALLY

and A2A CAPITAL SERVICES CANADA INC.

APPLICANTS

ALVAREZ & MARSAL CANADA INC.

DOCUMENT

AFFIDAVIT OF ROB PETERSEN

ADDRESS FOR SERVICE AND CONTACT **INFORMATION**

CASSELS BROCK & BLACKWELL LLP

Suite 3810, Bankers Hall West

888 3rd Street SW

Calgary, Alberta, T2P 5C5

OF PARTY **FILING THIS DOCUMENT**

Attention: Jeffrey Oliver / Danielle Marechal

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File No. 57100-4

AFFIDAVIT OF:

ROB PETERSEN

SWORN ON:

July 21, 2025

- I, Rob Petersen, of the city of Calgary, Alberta, SWEAR AND SAY THAT:
- 1. I am the Vice President - Projects at Azimuth Risk Management Ltd. ("Azimuth").
- 2. Azimuth is a specialized consulting firm offering expert advisory and support solutions to insolvency professionals, lenders, and other stakeholders. Azimuth is incorporated pursuant to the laws of the Province of Alberta. Azimuth has been hired as a consultant to the Monitor (as defined herein) to assist with a span of services including restructuring support, debt resolution strategies, investor communications, and operational assistance during these CCAA proceedings.

- 3. As such, I have personal knowledge of the matters hereinafter sworn to in this Affidavit, except where stated to be based on information and belief, and where so stated, I verily believe the same to be true.
- 4. Terms used and not otherwise defined herein shall have the meaning ascribed to them in the Monitor's Seventh Report dated July 21, 2025. All references to currency in this affidavit are references to Canadian dollars unless otherwise indicated.

I. RELIEF SOUGHT

- This affidavit is sworn in support of the application of Alvarez & Marsal Canada Inc. ("A&M"), in its capacity as the CCAA monitor with enhanced powers (in such capacity, the "Monitor") over the Debtor Companies (as defined herein) for an order pursuant to the Companies Creditors Arrangement Act, RSC 1985, c C-36 (the "CCAA") in respect of adding Wingham Creek A2A Developments Inc. ("Wingham Developments"), Lake Huron Shores A2A Developments Inc. ("LHS Developments"), and Meaford A2A Developments Inc. ("Meaford Developments", and collectively, the "Additional Project Entities") as debtor companies to these CCAA proceedings, among other things (the "July 29 Application").
- 6. I swear this Affidavit in support of the July 29 Application and in particular, the addition of the Additional Project Entities as a respondent to these CCAA proceedings.

II. INVESTOR COMMUNICATIONS

- 7. As a consultant for the Monitor, I have received inbound communication with a total of 245 investors regarding the A2A Group.
- 8. I have received in bound communication from the following number of investors in Lake Huron Shores ("LHS"), Wingham Creek ("Wingham"), and Meaford Highlands Resorts ("Meaford", and together with LHS and Wingham, the "Additional Projects"):
 - (a) 20 investors in Meaford. All but one of these investors have expressed frustration and concerns with the management of the A2A Group;
 - (b) 22 investors in Wingham. All but one of these investors (the same individual as indicated above) have expressed frustration and concerns with the management of the A2A Group; and
 - (c) 26 investors in LHS. All have expressed frustration and concerns with the management of the A2A Group.

 Of the investors I have communicated with, 239 investors who have expressed various concerns regarding their investments in Angus Manor Park ("Angus Manor"), Trails of Fossil Creek ("Fossil Creek"), and Hills of Windridge ("Windridge", and together with Angus Manor and Fossil Creek, the "Current CCAA Projects").

10. Of these 239 investors:

- (a) 32 of these investors invested in the Angus Manor project, with collective investments totalling \$701,325;
- (b) 68 of these investors invested in the Fossil Creek project, with collective investments totalling \$1,556,975 USD; and
- (c) 139 of these investors invested in Windridge project, with collective investments totalling \$4,973,950 USD.
- 11. Certain investors in the Current CCAA Projects have also invested in the Additional Projects.
- 12. Of the 32 investors I have communicated with in the Angus Manor project, eight of these individuals are also investors in the Additional Projects with investments collectively totalling \$160,000, as follows:
 - (a) two investors have invested in Wingham, with collective investments totalling \$30,000;
 - (b) two investors have invested in Meaford, with collective investments totalling \$30,000; and
 - (c) four investors have invested in LHS, with collective investments totalling \$100,000.
- 13. Of the 68 investors I have communicated with in the Fossil Creek project, fifteen of these individuals are also investors in the Additional Projects with investments collectively totalling \$400,100, as follows:
 - (a) six investors have invested in Wingham, with collective investments totalling \$150,100;
 - (b) three investors have invested in Meaford, with collective investments totalling \$120,000; and
 - (c) six investors have invested in LHS, with collective investments totalling \$130,000.
- 14. Of the 139 investors I have communicated with in the Windridge project, 24 of these individuals are also investors in the Additional Projects with investments collectively totalling \$530,000, as follows:
 - (a) five investors have invested in Wingham, with collective investments totalling \$135,000;
 - (b) six investors have invested in Meaford, with collective investments totalling \$115,000; and

(c) thirteen investors have invested in LHS, with collective investments totalling \$280,000.

III. CONCLUSION

15. I swear this affidavit in support of the relief sought by the Monitor and for no other or improper purpose.

SWORN BEFORE ME at the City of Calgary, in the
Province of Alberta, this 21st day of July, 2025

Danica Jorgenson
A Commissioner for Oaths and
Notary Public in and for Alberta

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Commissioner for Oaths/Notary Public in and for) Alberta

Rob Petersen

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