
EXHIBIT "32"

**To the Receiver's Seventh Report to Court
Dated January 14, 2019**

COURT FILE
NUMBER

1701-12996

COURT

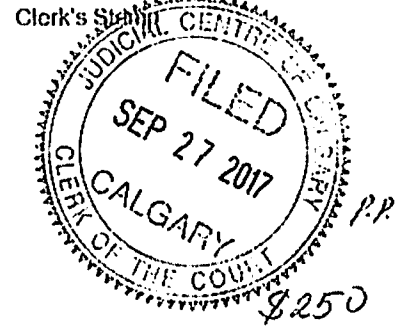
COURT OF QUEEN'S BENCH
OF ALBERTA

JUDICIAL CENTRE

CALGARY

PLAINTIFF

Easy Loan Corporation



Handwritten notes:
 No CD amount
 No CD of Ct
 No CD of Ct
 SC Acc.

DEFENDANTS

Phylis Denoon, Norm Denoon, Barbara Denoon, Pam Thompson, David Thompson, Audrey Thompson, Patricia O'keefe, Wendy Schmaltz, Ken Unger, Sandra Unger, Robert Wade, Eliane Wade, Carl Bryanton, Esther Bryanton, William Caton, Sophie Caton, Ray Sampert, Margaret Sampert, Barbara Janman, William Janman, Friday National & Associates Inc., 911827 Alberta Ltd., Windigo West Holdings Ltd., Catherine Wiseman, Jim Wiseman And Gail Wiseman, John Doe and Jane Doe

DOCUMENT

STATEMENT OF CLAIM

27/27/17 3:11:50 PM
 DOCUMENT #: 1701-12996
 COMMENCEMENT FEES \$250.00

 TOTAL \$250.00
 CHEQUE \$250.00
 Item count: 1
 Trans: 238456 040103025-001001

**ADDRESS FOR SERVICE
AND CONTACT
INFORMATION OF
PARTY FILING THIS
DOCUMENT**

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NOTICE TO DEFENDANTS

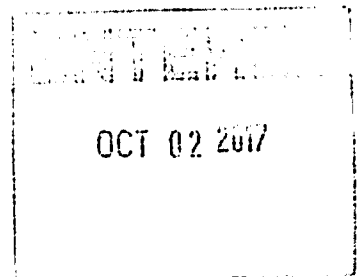
You are being sued. You are a Defendant.

Go to the end of this document to see what you can do and when you must do it.

Note: State below only facts and not evidence (Rule 13.6)

Statement of facts relied on:

1. The Plaintiff is a corporation that is duly registered pursuant to the laws of Alberta that operates in Calgary, Alberta.



2. The individual Defendants reside in Alberta and conduct business in Calgary, Alberta.
3. The corporate Defendants are duly registered in Alberta and operate in Calgary, Alberta.
4. Figure 1 herein below, records those individual Defendants who are also the controlling minds of the Defendant corporations.
5. The Defendants, John Doe and Jane Doe, are entities in receipt of the Plaintiff's money as set out in this claim whose identities are currently unknown to the Plaintiff but once known will be named accordingly and this claim amended.
6. The Defendants received an estimated amount of \$221,057.00 from Base Finance Ltd. ("Base Finance") withdrawn from the Base Finance RBC Account #02649, 100-405-0 ("RBC Account") between the period of May 2014 and June 2015 that rightfully belongs to the Plaintiff.
7. The Plaintiff invested with Base Finance during the period of May 2014 and June 2015. The Plaintiff's investment monies were deposited into the RBC Account during the period of May 2014 and June 2015. The RBC Account started with a nil (\$0) balance in May 2014.
8. At all times, the Plaintiff understood that Base Finance operated a mortgage business whereby it lent money to entities secured by a 1st mortgage on residential property located in and around Calgary, Alberta. The loan to value on the said mortgages was not to exceed 75%. The loans were in the nature of mezzanine financing with terms of between 6 months and 12 months.
9. By order of Justice Yamauchi K.D on October 15, 2015, Base Finance was placed under receivership. BDO Canada Limited was appointed by the Court as the receiver (the "Receiver").
10. In a decision dated February 8, 2016, Mr. Justice Yamauchi K.D (the "Decision") found that Base Finance was fraudulent. The Receiver has determined that Base Finance was operating as a Ponzi scheme.
11. At no time did the Plaintiff know that the funds it advanced were used in a Ponzi scheme. The Plaintiff would not have invested with Base Finance had it known that Base Finance was perpetrating a fraud.
12. The Decision made the following findings:
 - a. The RBC Account is imposed with a trust for the benefit of all investors of Base Finance.
 - b. The money of the investors of Base Finance could be traced into the RBC Account.
 - c. The tracing and distribution of the RBC Account shall be conducted by the Lowest Intermediate Balance Rule ("LIBR")
13. The Decision was appealed to the Alberta Court of Appeal and was upheld.

14. The Plaintiff claims an interest in monies the Defendants received from Base Finance, or the value thereof, by virtue of a constructive trust, equitable proprietary right or otherwise. The Plaintiff claims that the Defendants have been unjustly enriched to its detriment and there is no juristic reason for the unjust enrichment.
15. Alternatively, the Plaintiff claims that the transaction resulting from dispersing the Plaintiff's monies to the Defendants and their retaining of same is invalid pursuant to the Fraudulent Preferences Act, RSA 2000, c F-24, the Fraudulent Conveyances Statute, 13 Eliz. 1, Chapter 5 (U.K.), (the "Statute of Elizabeth"), the Bankruptcy and Insolvency Act, RSC 1985, c B-3 and Judicature Act, RSA 2000, c J-2.
16. The Plaintiff claims that the controlling mind of the Defendant corporations personally obtained the monies paid to their respective corporations from Base Finance Ponzi scheme, or received the value thereof. The Plaintiff seeks a tracing through the Defendant corporations and a judgment against the controlling minds for those monies, or the value thereof, flowing for their use and benefit through their respective corporations.
17. The Plaintiff claims the full amount received by the Defendants in the amount show in Figure 1, or such other amounts as this Honorable Court deems fit to grant, be returned to the Plaintiff.

Figure 1:

| | | |
|--|----|-----------|
| Phylis Denoon | \$ | 1,500.00 |
| Norm Denoon | \$ | 32,556.00 |
| Barbara Denoon | \$ | 56,500.00 |
| Pam Thompson | \$ | 3,750.00 |
| Davil & Audrey Thompson | \$ | 3,750.00 |
| Patrick O'keefe | \$ | 1,050.00 |
| Wendy Schmitz | \$ | 2,500.00 |
| Ken & Sandra Unger | \$ | 3,750.00 |
| Robert & Elaine Wade | \$ | 2,500.00 |
| Carl & Esther Bryanton | \$ | 5,000.00 |
| William & Sophie Caton | \$ | 1,250.00 |
| Ray & Margaret Sampert | \$ | 25,750.00 |
| Barbara Jannan & William Jannan | \$ | 42,250.00 |
| FRIDAY NATIONAL & ASSOCIATES INC. (William Jannan) | \$ | 5,000.00 |
| 911827 Alberta Ltd (Barbara Jannan) | \$ | 2,500.00 |
| WINDIGO WEST HOLDINGS LTD. (Thomas Wiseman) | \$ | 20,000.00 |
| Catherine Wiseman | \$ | 7,951.00 |
| Jim & Gail Wiseman | \$ | 3,500.00 |

18. The Plaintiff proposes that the trial of this action take place at the Court House in the City of Calgary in the Province of Alberta.

Remedy sought:

19. An order for an accounting and tracing of the monies received by the Defendants from Base Finance from the RBC Account.
20. A declaration that the money, in the estimated amount of estimated amount of \$221,057.00, or the value thereof, received by the Defendants, or to whom the valued is traced, from the RBC Account is the rightful property of the Plaintiff. Furthermore, that the said money, or value thereof, is held in trust for and on behalf of the Plaintiff and a vesting order to those monies or the properties into which the money, the value thereof, can be traced.
21. An order directing the Defendants to pay to the Plaintiff the amounts identified in the Plaintiff's tracing analysis, or as otherwise subscribed by the Court, failing which the Defendants shall be entitled to judgment against those Defendants for the amount unpaid.
22. Leave to amend this pleading to properly record the names of the recipients of the Ponzi scheme monies received from the RBC Account that rightfully belongs to the Plaintiff.
23. Costs
24. Interest pursuant to the Judgment Interest Act, R.S.A. 2000, c. J-1 as amended.
25. Such further and other relief as this Honourable Court may see fit to grant.

NOTICE TO THE DEFENDANTS

You only have a short time to do something to defend yourself against this claim:

20 days if you are served in Alberta

1 month if you are served outside Alberta but in Canada

2 months if you are served outside Canada.

You can respond by filing a statement of defence or a demand for notice in the office of the clerk of the Court of Queen's Bench at Calgary, Alberta, AND serving your statement of defence or a demand for notice on the plaintiff's address for service.

WARNING

If you do not file and serve a statement of defence or a demand for notice within your time period, you risk losing the law suit automatically. If you do not file, or do not serve, or are late in doing either of these things, a court may give a judgment to the plaintiff against you.