EXHIBIT "30"

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

COURT FILE NUMBER

1701-12994

COURT

COURT OF QUEEN'S BENCH

OF ALBERTA

JUDICIAL CENTRE

CALGARY

PLAINTIFF

Easy Loan Corporation

Clerk's Stamp

CLERK OF THE COURT
FILED

SEP 27 2017

JUDICIAL CENTRE
OF CALGARY

DEFENDANTS

Opal Management Inc., Patrick Jakubec, Wolf Creek Cabinets Ltd., John Harrison, Warrenpoint Properties (1986) Ltd., David Macdonald, Great West Feeds Ltd., Rosemary Gerdts, Northland Industrial Park (Red Deer) Ltd., Walter Gerdts, Arthur P Fishman Studio Of Interior Design Ltd., Authur Fishman, 960097 Alberta Ltd., Lorraine Forcade-Thiessen, Coldwell Holdings Inc., Sidney Coldwell, 940911 Alberta Ltd., Scott Mclean, 337915 Alberta Ltd., Joan Wernick, R & M Holding 2000 Inc. Ron Hedlund, GSE Scale Systems (Canada) Inc., Wayne Ballard, 274311 Alberta Ltd., Brencorp Ltd., Dan Mcguigan, Robert K. Mast Professional Corporation, Robert Mast, GCG Holdings Corp., Kenneth Farn, Patricia Farn 263787 Alberta Ltd., Randy Harper, 1117257 Alberta Ltd., Harry Lillo, Dana Dow Jewellers Ltd., Dana Dow, Clem's Holdings Ltd., Clemens Kuelker, Theresa Kuelker, 404571 Alberta Ltd., Janice Gerdts, Peter Bolli Holdings Ltd., Peter Bolli, Allan Forrest Sales (1976) Ltd., John Forrest, Allan Forrest Sales (1991) Ltd., 786025 Alberta Ltd., Vanessa Cook, Dondrian Diversified Sales Ltd., Donald Samson, John Doe and Jane Doe

DOCUMENT

STATEMENT OF CLAIM

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT RIVERSIDE LAW OFFICE c/o Christopher M.A. Souster 4108 Montgomery View N.W. Calgary, AB T3B 0L9

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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 operate in Calgary, Alberta. Figure 1 herein below, records those individual Defendants who are also the controlling minds of the Defendant corporations.
- 3. The corporate Defendants are duly registered pursuant to the laws of Alberta and operate in Calgary, Alberta.
- 4. 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.
- 5. The Defendants received an estimated amount of \$924,455.65 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.
- 6. 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.
- 7. 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.
- 8. 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").

16. 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.

Figure1:

| WARRENPOINT PROPERTIES (1986) LTD. | | | | |
|---|-------------|------------|---|------------------|
| (David MACDONALD) | \$ | 7,875.00 | BRENCORP LTD. (DAN Mcguigan) OPAL MANAGEMENT INC. | \$ 22,416.00 |
| David & Diane Macdonald GREAT WEST FEEDS LTD. | \$ | 5,000.00 | (PATRICK JAKUBEC) ROBERT K. MAST PROFESSIONAL | \$ 30,000.00 |
| (Walter Gerdts) | \$ | 16,500.00 | CORPORATION (Robert Mast) | \$ 9,250.00 |
| Rosemary Gerdts | \$ | 128,444.00 | GCG Holdings Corp. (Ken Farn) | \$ 4,750.00 |
| Walter Gerdts NORTHLAND INDUSTRIAL | \$ | 36,500.00 | Kennith Farn & Patricia Farn | \$ 17,025.00 |
| PARK (RED DEER) LTD | | | 263787 Alberta Ltd. | |
| (Walter Gerdts) | \$ | 158,292.00 | (RANDY HARPER) | \$ 10,000.00 |
| ARTHUR P FISHMAN STUDIO OF INTERIOR DESIGN LTD. & | | | | |
| (Authur Fishman Managing Mind) 960097 Alberta Ltd. | \$ | 20,000.00 | 1117257 Alberta ltd. (Harry Lillo) | \$ 13,000.00 |
| (Managng Mind LORRAINE | | | DANA DOW JEWELLERS LTD. | |
| FORCADE-THIESSEN) | \$ | 48,564.00 | (Dara Dow) | \$ 110,250.00 |
| SIDNEY Coldwell Coldwell Holdings Inc. | .\$ | 15,750.00 | Clemens Kuelker or Theresa Kuelker CLEM'S HOLDINGS LTD. (clemens | \$ 32,378.00 |
| (SIDNEY Coldwell) 940911 Alberta Ltd. (SCOTT MCLEAN and | \$ | 15,750.00 | Kuelker) | \$ 33,000.00 |
| KRISTINE MCLEAN) 337915 Alberta Ltd. | · \$ | 10,000.00 | 404571 Alberta Ltd. (Janice Gerdts) PETER BOLLI HOLDINGS LTD. | \$ 5,750.00 |
| (Joan Wernick) | \$ | 44,500.00 | (Peter Bolli) | \$ 2,500.00 |
| | | | ALLAN FORREST SALES (1976) LTD. | |
| WOLF CREEK CABINETS LTD. | | | or ALLAN FORREST SALES (1991) | |
| (JOHN HARRISON | \$ | 5,250.00 | LTD. (John Forrest) | \$ 10,000.00 |
| R & M HOLDING 2000 INC. | | | | |
| (managing Minds - Ron and Marie | | | 786025 Alberta Ltd. | |
| HEDLUND) GSE SCALE SYSTEMS | \$ | 84,711.65 | (VANESSA COOK) | \$ 10,000.00 |
| (CANADA) INC. ((Wayne | | | Dondrian Diversified Sales Ltd. (| |
| BALLARD) | \$ | 2,500.00 | DONALD Samson) | \$ 12,000.00 |
| 274311 ALBERTA LTD. | | | | |
| (Wayne BALLARD) | \$ | 2,500.00 | Total | \$ 924,455.65 |

17. 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:

- 18. An order for an accounting and tracing of the monies received by the Defendants from Base Finance from the RBC Account.
- 19. A declaration that the money, in the estimated amount of \$924,455.65, 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, or value thereof, can be traced.
- 20. 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 Plaintiff shall be entitled to judgment against those Defendants for the amount unpaid.
- 21. 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 belong to the Plaintiff.
- 22. Costs.
- 23. Interest pursuant to the Judgment Interest Act, R.S.A. 2000, c. J-1 as amended.
- 24. 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

I 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.