



This is the 1st Affidavit
of S. Irvine in this case
and was made on November 17, 2023

No. VLC-S-S-217976
Vancouver Registry

In the Supreme Court of British Columbia

BETWEEN

SCOTT COUSENS

PLAINTIFF

AND

VIVIAN KRAUSE

DEFENDANT

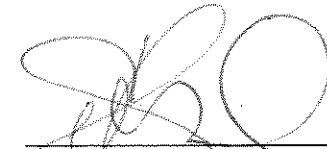
AFFIDAVIT

I, Stewart Irvine, of North Vancouver, in the Province of British Columbia, SWEAR
THAT:

1. I was the founder and an original director of a charity I named the Global Charity Fund. As such I have personal knowledge of the matters and facts hereinafter deposed to, except where the same are stated to be based upon information and belief, and where so stated I verily believe the same to be true.
2. My interest in setting up a charity in the late 1990's was to benefit the Red Cross / Red Crescent, an organization based in Geneva, whose work I have greatly admired for many years. My idea was to harness the fundraising ability of an online casino whose profit would be used for charitable purposes. I came up with the name Global Charity Fund and was introduced to a lawyer, Blake Bromley, who was recommended as a pre-eminent charity lawyer.

- 3. After the Global Charity Fund was registered, with me as a director and also Blake Bromley, the Red Cross informed me that they disliked the optics of being associated with online gaming, even though it was to benefit charity, and they did not wish to proceed.
- 4. I informed Mr. Bromley that the plan had come to a dead end, and would not be proceeding. He assured me he would look after it and I trusted that he had done so. In the more than 20 years that have since passed, I assumed the charity was defunct and had been dissolved.
- 5. In the spring of 2023 I had a telephone call from Vivian Krause, and learned that GCF had, according to tax records, claimed to have received gifts of some \$70 million, and had in turn made very significant gifts to at least four other organizations, who then made significant loans to a charity called Fortius involved with a sports center and to Quest University.
- 6. I never intended GCF to be involved with a sports centre or a university, and especially not to be involved in loans. I would not have agreed to such transactions. I am shocked that they were made using a charity with whom my name is associated as a founder. It concerns me greatly to learn that Fortius subsequently had its charitable status revoked and Quest filed for creditor protection.

SWORN BEFORE ME at the City of
Vancouver, in the Province of British
Columbia, this 17 day of November, 2023

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) _____
) **STEWART IRVINE**

A Commissioner for taking Affidavits for
British Columbia

PAUL A. BRACKSTONE
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A F F I D A V I T

OWEN BIRD LAW CORPORATION

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Attention: Daniel Burnett K.C.

File No. 33554-0001
