

This is the 2nd Affidavit of
Murray Bockhold in this case and
was made on the 21st day of November, 2024

No. S-241997
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN

**CIBC WOOD GUNDY, A DIVISION OF CIBC WORLD MARKETS INC./
MARCHE MONDIAUX CIBC INC.**

PLAINTIFF

AND

MURRAY BOCKHOLD

DEFENDANT

AFFIDAVIT

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For hearing in BC Supreme Court:

Date: November 22, 2024

Time: 10:00 a.m.

Place of Application: 800 Smithe Street, Vancouver, BC

Time estimate: Full day


Application Record provided by: Plaintiff

To be Heard Before a: Judge

AFFIDAVIT

I, Murray Bockhold, of 6266 Par Road, Whistler, British Columbia, Chairman of Bockhold Investment Management ("BIM"), AFFIRM THAT:

1. I am the Defendant in this action and as such I have direct knowledge of the facts and matters hereinafter deposed to, save and except in cases where such matters are stated to be known on information and belief and where so stated I verily believe them to be true.
2. Attached hereto and marked as Exhibit "1" is a letter to John Fabello at Torys, dated November 21, 2024
3. Attached hereto and marked as Exhibit "2" is a Case History and Summary of Evidence dated November 21, 2024
4. Attached hereto and marked as Exhibit "3" is a Badger Daylight Market Manipulation report by Urvin Finance for the period April 3 to June 30, 2017.
5. Attached hereto and marked as Exhibit "4" are four(4) ShareIntel Imbalance Reports for Power Nickel dated July 7, 2024, July 31, 2024, August 15, 2024 and August 30, 2024
6. Attached hereto and marked as Exhibit "5" is a Buyins.net Counterfeit Report for CXR, CXRX, CXRXF and ADVZ dated December 16, 2019.
7. Attached hereto and marked as Exhibit "6" is an email to Michael Howcroft at Blakes, Jameel Madhany at Colson Winterstein and John Fabello at Torys dated November 21, 2024 with attachments that included the correspondence to Mr. Fabello and the Case History referred to in "1" above.
8. Attached hereto and marked as Exhibit "7" is an email to all the parties involved in this matter giving them Notice of Service dated November 21, 2024.

SWORN BEFORE ME at Whistler,)
 British Columbia, on November 21, 2024)
)
 A Notary Public in and for the Province of)
 British Columbia)


 MURRAY BOCKHOLD

AMANDA WELTON-HAGEN
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This is Exhibit "1" referred to in
the Affidavit of Murray Backhold
sworn to before me at Whistler
in the Province of British Columbia
this 21 day of November, 2024
[Signature]
A Commissioner for taking Affidavits
in and for the Province of British Columbia

Mr. John Fabello
Torys
79 Wellington St. W., 30th Floor
Box 270, TD South Tower
Toronto, Ontario
M5K 1N2

November 21, 2024

Re: Mitigating risk to our national security and enhancing consumer protection

Dear John,

You and I have only recently started to communicate so I wanted to give you a sense for the hornet's nest I've stepped on, and so have you, perhaps unknowingly? Sorry for bombarding you like this,

The TD Bank debacle has opened everyone's eyes to the unimaginable -- which is exactly what our story has evolved into and is explained below. I have made a 'best efforts' to shorten it here without losing the scale of the unlawfulness. It really is quite unbelievable, and my pleadings in my upcoming hearing only tell part of the story. There is another whole component in Nevada where BIM has evidence alleging that Judge Zive, Judge Freeman, 3 Supreme Court judges, 3 members of the US Trustee's office and a number of attorneys have acted jointly, and in concert, to prevent investigations of Waterton Global Resource Management.

The scale has reached new heights of malfeasance in the last 2 weeks with new evidence that alleges:

1. Neither the Executive Director of the BCSC, nor two of the Commissioner's who I have known for many years, will confirm they have shared important evidence of unlawfulness with the other 8 Commissioners in accordance with proper corporate governance,
2. The BCSC, IMET, CIRO the OSC, and Ernst & Young confirmed they are not closing the loopholes, nor investigating the complaints alleging illegal market manipulation that [BIM](#), [Harrington Global](#), [Save Canadian Mining](#) and [Quantum Biopharma](#) have requested. This is in spite of the fact that CIRO has acknowledged, in a settlement agreement with [CIBC](#) in April 2022, that market manipulation is illegal, and
3. My counsel at Colson Winterstein breached their duty of undivided loyalty to their client.

The evolution of this story is all about patterns and it all begins with a fundamental assumption that the person, attorney, company, accountant, regulator, judge or politician you are dealing with is acting in good faith, has integrity, follows the rules and performs their fiduciary duty on behalf of the parties they have that duty to. If the rules don't exist and nefarious types are using the loopholes to their advantage, it is the regulators and the House of Commons responsibility to establish new rules and laws that the courts can adjudicate. Regulators and law enforcement have a mandate to close the loopholes in capital markets regulation, enforce the rules, fine or imprison the perpetrators, restore market integrity *and provide adequate consumer protection*.

Based on the experience of our growing list of victims, we give Canada an 'F' - a grade that should embarrass everyone risking ignominious defeat. BIM is well aware of the seriousness of our allegations however, we are also well aware of the vast amounts of evidence we have to support them which is summarized in the attached [Case History](#).

Each of the parties has a duty:

1. Victims - to ourselves, our clients or our shareholders, to seek transparency, justice and restitution
2. Public company BOD - to the shareholders,
3. Regulators - to investors and the public at large,
4. CIBC - to their employees and shareholders,
5. OSFI, EY, Deloitte, KPMG and PwC - to the shareholders of the public companies they regulate and audit,
6. Courts - to adjudicate and make decisions that enforce the law,
7. Politicians & bureaucrats - to represent the people who elected, or hired them to bring into law the rules that protect the public, and
8. Attorneys - the duty of an undivided loyalty to their client.

Unfortunately, our world is strewn with people who don't have integrity and act in bad faith. In Waterton's case, management and the board of public companies were allegedly 'complicit' in stealing assets, bankruptcy fraud, concealment, contempt and running a Ponzi scheme. In the Nevada courts, we have evidence alleging they were 'complicit' with Waterton to ensure any

claim against them was dismissed. In the Richardson GMP saga, management and the board were allegedly 'complicit' in oppression of the minority interest via a fraudulent conveyance that harmed the RPFL partners - they should have received 2.45x more shares (also Ex 23, Part III) of RGMP. At CIBC, we are alleging they participate in illegal market manipulation which is 'complicit' with their institutional clients (e.g. the settlement with IIROC for 2 DEA accounts). Moreover, there is evidence alleging an employee committed perjury and Blakes and Colson Winterstein were allegedly 'complicit' when they manipulated BIM into accepting CIBC's pre-trial settlement offer. For TD Bank, management and the board were 'complicit' in enabling money laundering to go on for almost as long as BIM and Harrington have been pursuing the BCSC, CIRO, IMET, the OSC and the Richardson's. In BIM's case, it has been 15 years for the Richardson's and 11 years for the BCSC, IMET, OSC and CIRO.

TD Bank pleaded guilty to criminal charges over a period of *only* a decade.

As you develop relationships, you look for alignment of values, ethics, integrity and congruence between the actions and the words. When, and if, a yellow card appears you make a note of it. As the yellow cards start accumulating you get more suspicious so you start paying closer attention and watch for them to turn into orange cards. Then one day, you raise a red card and depending on the person or institution it might take a few RED CARDS before it triggers what I have dubbed the 'Complicity Identifier' and it turns into a RED CARD. In that moment you look back at everything that has happened from the lens of someone operating in bad faith – and suddenly every card makes perfect sense.

That moment for me, and my fellow partners at RPFL, was when we learned how egregious the share exchange ratio was in the merger with GMP, attempted to negotiate a fairer deal, and got completely shut down. RED CARD Which, as you know, is documented in our Minority Shareholder Oppression report of May 2, 2016 (Part I, II and III). Royden was right there supporting us until his unfortunate passing. However, at that moment, Hartley, Carolyn and Sandy suddenly lost all credibility. In fairness to Carolyn, my sense at that time (2013) was she was a person of integrity who had been manipulated by Sandy Riley like so many people have, including Susi Bonk. Having said that, I'm willing to bet the Chairman of TD Bank knew about the money laundering and failed to shut it down. In any event, in July 2020, JRSL's Chairman, Carolyn Hursh, learned about the harm to my former clients and didn't step forward to help them. Sorry Carolyn, that was a 'Complicity Identifier' so you get a RED CARD. In fact, Richardson Wealth has received many RED CARDS over the years, perhaps one of the most noteworthy being Lauren Shneer, who declined Gryphon's request to cooperate when she was associate general counsel at RGMP, and then again as a senior investigator at the OSC.

Naturally, this entire process of moving from yellow, to orange, to red and on up becomes even more complex when there are conflicts of interest. As well, inaction could be because someone is behind a Chinese wall so they may not be 'complicit' in a nefarious sense. However, that doesn't prevent them from being polite by acknowledging your concerns are valid and providing some sort of an explanation or excuse for why they aren't, or can't, support your request.

Let's begin with a few key assumptions and facts. I'm afraid it's complicated... but fascinating!
Here are some observations and selected exhibits from the Case History:

1. Prior to the TD Bank pleading guilty to money laundering, RBC and TD were the icons of Canadian banking. No one in their right mind would have suspected TD Bank of condoning money laundering for **10 years**.
2. TD's debacle raises all kinds of questions about governance and oversight. Clearly, management had known and turned a blind eye and it is hard to comprehend the news didn't filter up to someone at the Board, their accountant EY, or to the OSFI -- and the moment it did (if it didn't that is also a problem) that person had a duty to ensure the rest of the Board, EY and the OSFI knew the extent of the evidence. If they didn't, they should be charged criminally. And if they did, and the Board, EY or the OSFI swept it under the rug, the whole lot of them should be charged criminally. (Which I'm willing to bet Ms. Warren is going to ensure - stay tuned)
3. During the pendency of the bankruptcy, Trustee Lovato hired PwC to conduct a forensic analysis. Of the many findings of fact published in their Initial Report of April 28, 2015, PwC determined that \$3 million was double counted and therefore Waterton had filed a false statement of claim. It remains to be seen why Judge Zive overlooked this when he arrived at his decision to dismiss the bankruptcy. It also remains to be seen why Trustee Lovato and PwC overlooked this when BIM reached out for their support, Trustee Lovato is discussed further in 13 below. Correspondence with PwC can be found in Exhibits 236, 239, 256, and 265. PwC triggered the 'Complicity Identifier' and earns our top honor for bad faith, our first **RED CARD**
4. Brenda Leung, Chair of the BCSC and the Honourable Bill Morneau, Minister of Finance at the time and a current board member of CIBC, first learned about the unlawfulness in our story in correspondence dated February 12, 2016. The reply we received from Peter Brady was the first of many Red Cards at the BCSC. However, because of who they are, you naturally assume they are operating from a place of integrity and good faith so you tolerate it in the early going. *Fast forward* - On information and belief, BIM was advised by Danning Guy of Harrington Global, that former Liberal whip, General Andrew Leslie approached Mr. Morneau asking him to support Save Canadian Mining and was rebuffed. Given Mr. Morneau's prior knowledge of CIBC being involved with the unlawfulness at Gryphon the question begs to be asked, Why did he rebuff General Leslie? **RED CARD**
5. On May 25, 2017, Doug Cope (IIROC) organized the 1st of many meetings with IIROC, the OSC, and IMET. When he passed away unexpectedly, the momentum at the OSC/IMET quickly died. Red Card.
6. In August 2017, our attorney at DLA Piper, Courtney Saleski (x-DOJ) sent a request to investigate to the DOJ. Over the next few months one went to the OSC, BCSC and RCMP and not one of them had the courtesy to reply. **RED CARD** Fortunately, Courtney got an immediate reply from Gary Winters (DOJ) asking for a copy of this chart we had built of Waterton's network. Within a matter of weeks a meeting was arranged in Washington D.C. for mid-November. In Courtneys words "Murray, in my experience, I

have never seen the DOJ move this fast." The meeting got canceled for unknown reasons 3 days beforehand and was rescheduled for March 2018 in Reno at FBI headquarters where Steve Craig (Gryphon geologist) and I were interviewed (Courtney was present). In that meeting, Tracee Plowell (DOJ) specifically asked me to keep 'memorializing' discussions and events with emails to create an evidentiary trail. As the scope and scale of the alleged malfeasance has grown, my commitment to follow Tracee's advice has grown along with it.

7. On June 28, 2018, Derek Bell (DLA Piper) gave a presentation outlining Waterton's malfeasance to Hugh Craig at the OSC. Derek and Hugh had worked together on the huge fraud at Sino-Forest. Derek advised me at the time, he never got a reply from the OSC. This was a flashing RED CARD given they had ignored the original presentation and DLA's previous letter that the DOJ reacted to immediately.
8. On April 17, 2019 Gryphon made a noteworthy press release
9. In Sept 2019, I first learned of something that would create a very, very challenging personal situation. G.R. Dawson Holdings, a client since 1986 with **not one yellow card**, had accepted a classic Waterton tactic - "What is it that is going to fix this?" Waterton called a special meeting with only Peter Hawley, Brian Lock and Bruce and Ian Dawson an hour before the BCSC 'sting' operation Romolo DiFonzo and BIM had organized for the upcoming Scorpio board meeting. To my dismay, Romolo and I never received the text to enter the board meeting with a forensic specialist to download every board member's text and email records with Waterton. RED CARD. As the Dawson's knew, the operation was modeled after Bill Matlack who had used it successfully at Klondex Mines to root out Waterton conspirators on the Klondex board. Anyone that wouldn't agree to the download would be asked to hand in their resignation at the board meeting. (KL was subsequently sold to Hecla for 6X the price)
10. As Gryphon custodian, until my appointment 'lapsed' with no warning (more on this later), we reached out with a request for cooperation to CIBC, RCMP, Hamilton Lane and Atlantic-Pacific Capital, and again on May 22, 2020 and June 24, 2020. We received a "We decline to cooperate" from CIBC and RGMP and no reply at all from Hamilton Lane and A-P Capital. RED CARDS for HL and AP and 'Complicity Identifier' for CIBC and RGMP. RED CARD
11. As time passed there were a series of RED CARDS until the RED CARD when the Dawson's threatened to transfer their accounts if I didn't back down on my resistance to the Titan/Scorpio deal. Complete alignment of interest, ethics, integrity, respect and congruency for 35 years, shattered in a matter of days. Well, I knew which side of that conflict I was on – the other 149 client families. Ianco and Matco were BIM Groups' largest clients, and true to their threat, they have transferred out 95% of their assets under management. It was the first of what would prove to be many serious 'Complicity Identifiers". Absent a failed start-up all of 3 of us invested in, we had enjoyed a fabulous friendship and business relationship and a long history of success which began when their father G.R. became my mentor, so when Ian and Bruce turned against their fellow clients and then apologized for doing it. Ian and Bruce are the second recipients of our top honor. RED CARD.

12. During my tenure as Gryphon custodian, Seth Adams (GGN attorney) and I were scheduled for a 2nd in-person meeting with the DOJ in May 2021. Due to COVID, it was decided we should have a Zoom call from the Woodburn & Wedge office in Reno. After a 3 hour presentation, trial attorney, Jarred Day, replied with words to the effect that "The AG is very busy and we never quite know what cases they decide to look into". Seth and I were taken aback - evidence of bankruptcy fraud, concealment, contempt and a Ponzi scheme of \$3-4 billion and they aren't anxious to immediately start their investigation? RED CARD. In my experience, when a Canadian regulator opens an investigation they engage with you like Doug Cope, Dan McVicker, Romolo DiFonzo, Karen Chernoff, Jim Blatchford, William Ting, Teresa Mitchel-Banks, Mike Hutchison, and Ken Derakhshan all did the moment they heard Gryphon's story. I've long since learned, when there is deathly silence odds are there is no investigation going on. RED CARD (The DOJ operates with much less engagement)
13. On November 21, 2021, BIM released our Documentary - The Dark Pond of Money
14. Subsequently, there were a series of RED CARDS emanating from the US Trustee's Office including:
 - i) With 7 Gryphon whistleblower affidavits in hand in addition to PwC's forensic report and numerous other reports, Gryphon made a Request for Referral to Trustee Lovato dated February 10, 2022. This letter deserves a thorough read because it is the evidence that gave Gryphon the 'Complicity Identifier' alleging that Judges Zive and Freeman are complicit,
 - ii) Trustee Lovato replied through her counsel, Jeff Hartman, on March 18, 2022, claiming she had discharged her fiduciary duty by sending the letter. Her allegedly fraudulent reply is marked by the absurdity of hiding behind the dismissal of all 3 Nevada courts who conveniently ignored PwC, 7 affidavits from Borealis mine employees that hid, and assayed, 440 tons of gold bearing carbon hidden in a pond worth in excess of US\$ 30 million. Note - there are no names associated with the referral to the Inspector General, US Attorney, SEC or the Nevada AG which makes it impossible to confirm they received the correspondence, or what they did about it. Moreover, the correspondence is untraceable - there is nothing indicating the letters were couriered, sent by registered mail or Emailed. BIM alleges the letter was never mailed and Nicholas Strozza and Timothy S. Laffredi are complicit so if BIM were to reach out (which I intend to ask PwC to do with me with a copy of their report and this letter) I am sure they will acknowledge receipt of the letter and give the classic regulator reply "Due to our strict confidentiality guidelines we are not at liberty to disclose any information regarding any review or investigation that we undertake. As a result, you will likely hear nothing further from us on this matter."— a classic ploy to deceive and avoid accountability. Also, note who Trustee Lovato *didn't* send a copy too; the very person who's courtroom the alleged malfeasance occurred in, Judge Zive. Nor did she send it to the USTP who Seth and BIM had presented to months before (and she knew about). Obviously, the assumption is the US Bankruptcy Court, Office of the US Trustee or the USTP act in good faith. You would expect them to be incensed the instant they get wind of contempt on their watch. Yet, there is silence and avoidance from all of them. Why? As well, what possible reason would Judge Zive deny 4 requests for copies of the

sealed PwC forensic report – he received one from each of IIROC, the BCSC, RCMP and myself as Gryphon custodian to provide under seal to BC Supreme Court? Answer – Zive dismissed a case when he knew the PwC forensic report confirmed \$3 million was never loaned, and

- iii) Following that, Seth Adams called and advised I was creating too much havoc in the 'bankruptcy community' in Reno and he intimated that his career would be seriously impaired if he pursued filing Gryphon's Adversary Complaint or the response Gryphon drafted to Trustee Lovato. They are long and detailed, but tell a fascinating story that will put Netflix to shame when we release our second documentary. Finally, in a very uncharacteristic outburst, Seth told me I had to 'stand down'. This was another serious 'Complicity Identifier' because Seth Adams is a person of absolute integrity and dedication to his clients so there was only one way to interpret his request - like Romolo DiFonzo, he had been intimidated. Our 3rd 'Complicity Identifier' to earn our top honor is the U.S. Trustee Program, Section 17. RED CARD BIM gives Seth Adams, our first GOLD CARD for always operating in good faith with integrity, perseverance and dedication to his clients.

15. There was a very important clue on April 4, 2023, when CIBC released their Management Proxy Circular. Note, on page 9 there is a seemingly innocent statement:

"Nicholas D. Le Pan and Jane L. Peverett are retiring at the close of our meeting. The Board would like to thank Mr. Le Pan and Ms. Peverett for their years of dedicated service to the Board and to CIBC."

It is perfectly natural for someone to retire without explanation from a board of directors. However, in Ms. Peverett's case, and perhaps Nicholas Le Pans, it is very likely they did not 'retire', they chose not to stand for reelection. Recall on April 13, 2020, BIM reached out to Alice Dunning and asked her to provide evidence of wrongdoing to Ms. Peverett. Ms. Dunning confirmed receipt on June 3, 2020. On information and belief, Ms. Peverett fulfilled her fiduciary duty and reported the unlawfulness to the board. When she didn't agree with the direction that was being taken with the matter she, and perhaps Mr. Le Pans, intentionally didn't stand for reelection. BIM awards Ms. Peverett, and perhaps Mr. Le Pans, with a GOLD CARD for her integrity, and her story will be very revealing. In the event it is proven that this matter was discussed by the entire Board of Directors, which it should have been, and the remaining directors turned a blind eye, they should be asked to resign immediately and face criminal prosecution.

16. Romolo DiFonzo had volunteered to testify at my trial, but was intimidated by the BCSC so he did not testify. Text messages from his personal phone and burner phone are exhibited in my affidavit. Romolo was so upset with the outcome of my trial that he agreed to co-author a Request for Referral on September 11, 2023. In our view, Romolo DiFonzo and Jim Blatchford clearly deserve a GOLD CARD for their integrity and making an earnest attempt to do what is right in the face of intimidation and adversity..
17. In November 2023, I had the good fortune of being introduced to Danny Guy at Harrington and Terry Lynch at Save Canadian Mining -- and that was a game changer. As you will see below, my tenacity has grown with each passing day as the evidence

mounts that the 3 of us have stepped on a HUGE hornets nest. The RED CARDS have been coming at us fast, and furious. My 39 years in the business had not prepared me for what I would learn from Danny and Terry. I knew what naked shorting was but the prevalence of it, that it is self-reported and uses a bank trading platform that employs DEA, DMA, and SME, what the scale of FTD's are, and algorithm trading strategies using spoofing, baiting, and pinging was a new and shocking revelation that was a huge RED CARD for CIBC and all our chartered banks and accounting firms. In all likelihood, CIBC had been using these alleged illegal trading strategies with Waterton right from when I first discovered the malfeasance in 2013 and reported it to CIBC and ALL the Canadian regulators. The trading strategies were used in conjunction with Waterton's death spiral business model and alleged RICO network, to strip 13 mines from the public companies, Then they allegedly bundled them in Waterton Precious Metals Fund I, marked them up and re-sold them to WPMF II investors. Therefore, it appeared as though CIBC, Waterton, the US Trustee's Office, the Nevada Courts, the OSC, BCSC, CIRO, CSA and IMET were allegedly part of a vast network that were helping one another make money using allegedly illegal methods. RED CARD

18. This revelation resulted in BIM embarking on a campaign with Harrington and Save Canadian Mining to bring awareness to the loopholes in our SRO regulatory structure, the need for change, and provide suggestions that would mitigate risk to our national security and enhance consumer protection. It was also an opportunity to gather evidence to prove, or disprove, our theory. Some of the key communications in our campaign which are exhibited in my affidavit include -- Deputy PM, Minister of Finance, Premier Eby, CIRO, the AG and MoF, All Parties and the DOJ and RCMP. Outside of the odd acknowledgement of receipt, BIM did not receive a substantive reply specific to these requests from any of the parties - RED CARD
19. As part of our campaign, BIM also sent 3 requests to each of EY, Deloitte, KPMG and PwC. Here are the 3 to EY March 19, 2024, March 28, 2024 and May 13, 2024. Note the names who received the 2nd request, and note the 3rd request included an offer to present the DOJ presentation. There was no reply from PwC, Deloitte or KPMG and EY provided this reply. RED CARD
20. By now I'm in disbelief, not one of Canada's Big 4 international accounting firms or any of the politicians even asked for a copy of the DOJ presentation, much less asked me to present it. Doesn't *anyone* have any integrity, or is it all just about the money – even when you know it is being earned fraudulently just like it was at TD Bank. Armed with all this new evidence, and having been served by CIBC for a summary judgment for the balance owing on our settlement, I took the position that I had signed the settlement under fraudulent pretenses – Amended Response, Application Response, and Affidavit.
21. My concerns were really elevated when, with great enthusiasm, I tried to share all this exciting news with my former attorney, Jameel Madhany and, just like all the bad actors, he was unresponsive. When there is new information that might turn a negative into a positive, shouldn't your former attorney, consistent with his undivided loyalty to you when he was your attorney, want to jump on board immediately – and if they are conflicted, eagerly refer you out? Jameel's response was identical to other key people like Judge Zive, Trustee Lovato, her Special Counsel Greg Wilson, Judge Freeman and the

Dawson's – Jameel demonstrated no willingness to act in good faith. Let's be honest, it takes many red cards to convince yourself your attorneys are acting jointly, and in concert, with the defendants counsel. So then I asked myself 'Why did Jameel and Malcolm allow me to go to trial with no witnesses when Colson Winterstein had 5 years to prepare and there were 8 other witnesses we could have asked on short notice after we learned that DiFonzo, Blatchford, Funt and Hursh couldn't testify? (4 of the original 12 in our 1st Trial Brief that Jameel whittled down to 4 for any number of reasons?) Jameel should have jumped on the opportunity to fill those slots. There was only one logical answer to that question - he didn't want witnesses. *When I signed the Minutes of Settlement I believed 100% that both Jameel and Malcolm were performing their duty of undivided loyalty to their client, so I accepted their advice.* RED CARD. (More on this to follow)

22. To add to all of the disbelief, in a conference call with Shawn Beckett and Adam Wallace of the OPO in Ontario, I explained about my history with the DOJ, the link between Danny Guy and our experience at IMET, and offered to fly to Toronto to present to Patrick Sackville and whomever they wanted at the meeting. Again, no request to present, no request to receive a copy, no thank you for the offer. RED CARD
23. Here is an important email to CIBC that connects the dots with the unlawfulness Danny was part of discovering at the OSC. RED CARD.
24. I urge you to pay close attention to this next RED CARD. To my complete and utter astonishment, I received a letter, on Commissioner Michael Duheme's behalf, from IMET dated August 16, 2024 in which IMET advised they have done a new review and, once again, do not intend to pursue an investigation at this time. Help me understand, how could anyone reach that conclusion after receiving this list of correspondence – 189, 191, 201, 203, 214, 215, 217, 218, 219, 223, 228, 232, 244 and 257? In addition, INSP Tarachandra is the same officer who I asked my 30 year personal friend and advisor to the OSC, Doug Steiner, to connect me with and he dropped the ball (note the link to Pat Chaukos who was terminated in the OSC's housecleaning) Another key 'Complicity Identifier' earns IMET a RED CARD
25. On August 20, 2024, four(4) days after INSP Tarachandra penned the letter to BIM, Commissioner Duheme received a Renewed Request to all parties. BIM has not received a reply from any of the recipient's. RED CARD
26. By now, I am really upset so I sent this email to Lauren Shneer at the OSC (note the cc). Five(5) days later, I received a reply from Katrina Gustafson, Acting Manager of Enforcement. Talk about a 'Complicity Identifier'. By now, I am totally starting to understand the scale of malfeasance so I sent a follow-up reply to Katrina Gustafson and Blakes on September 13. RED CARD
27. Next step was to turn my focus back to the BCSC and EY. This update went to Peter Brady on October 25 and this one went to Kevin Brennan on October 29. On November 5, I followed up with Peter Brady and on November 7 with Commissioners Funt and Kershaw. I have known Jim Kershaw since we rushed together at a fraternity in 1976 at UBC. His reply was another of the many difficult things to come to terms with. All of these people I have known for years, and none of them have performed their duty or acted from a place of integrity. RED CARD.

28. On November 8, 2024, I reached out to [Gordon Smith](#) and less than 3 hours later, I received a reply from [Peter Brady](#). Perfect, that makes BIM and/or the BIM Committee officially 5 for 5. We are banned or dismissed by the [BCSC](#), [CIRO](#), [OSC](#), [IMET](#) and [EY](#). Can you get a more serious 'Complicity Identifier' than that? **RED CARD**. Clearly, our regulatory system is working exactly as the BCSC is advertising on TV!
29. I want to briefly come back to my attorneys before closing. A series of yellow, orange and red cards began when, unannounced, Bob Colson handed my wrongful dismissal claim against CIBC to Jameel Madhany and Malcolm Woodside in early 2021. This was no different then Jim O'Neil innocently arriving to replace John Key at Gryphon back in 2013, or Judge Zive replacing Judge Beesley in 2014, or Jean-Marc Freeman unexpectedly replacing Gary Whitfield and all the other machinations of people movement on pages 29 and 30 of the updated, March 7, 2024, [USTP Case Review](#). My final 'Complicity Identifier' was triggered in [299](#), [303](#) and [307](#) which earned Jameel and Malcolm their **RED CARD**.

Imagine the feeling of betrayal, if you can, when Jameel's 'Complicity Identifier' was triggered and I reflected on all the times I'd read an email or hung up the phone feeling confused or angry because his argument(s) made no sense... *suddenly made perfect sense*. There is only me to blame for that misplaced trust.

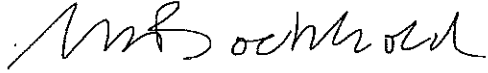
So let's wrap this up with some interesting conjecture. Was there someone equivalent to BIM, the BIM Committee, Harrington, SCM, Premium Nickel or Quantum Biopharma in the TD Bank debacle? Multiple parties who went to TD management, the Board, all of the regulators, law enforcement and politicians and showed them the evidence of money laundering and meticulously, and consistently, provided them with new evidence for *11 years* -- and they were ignored and/or shut down from further communication and likely labeled as a conspiracy theorist like the nefarious types try to pin on BIM? You have to believe there was, it simply was too big of a fraud and went on for too long to not attract attention. The good news in our situation is -- we know it has already been reported to all the right parties, and the scale is much larger and involves more participants because *we have a Case History with 309 exhibits that will be shared with everyone*.

Of the 8 'parties' in Canadian society with a duty in our debacle, it would appear the victims and the courts, to the extent the right laws exist, are the only ones with integrity who have fulfilled their fiduciary duty. In Canada, the proper rules don't exist so we are asking the courts to adjudicate with one arm tied behind their back. That will be part of our goal at Friday's hearing. BIM will use this letter as a roadmap and reference the Case History to separate the parties who simply aren't fulfilling their fiduciary duty like Deloitte and KPMG, from the parties who have triggered a 'Complicity Identifier' and are acting in bad faith like CIBC, the BCSC, OSC, IMET, CIRO and Ernst & Young and PwC.

BIM has every confidence in the BC Supreme Court and we welcome the opportunity to engage with them. We also take solace in the knowledge that we weren't ignored by the party that actually does their job, the US Department of Justice.

Welcome to the hornet's nest John.

Sincerely,

A handwritten signature in black ink, appearing to read "Murray Bockhold". The signature is fluid and cursive, with the first name "Murray" and last name "Bockhold" clearly distinguishable.

Murray Bockhold
Bockhold Investment Management



This is Exhibit "2" referred to in
the Affidavit of Murray Bockhold
sworn to before me at Whistler
in the Province of British Columbia
this 21 day of November, 2024

A. Nelson
A Commissioner for taking Affidavits
in and for the Province of British Columbia

Case History and Summary of Evidence
(Additional IMET/RCMP)

<u>No.</u>	<u>Date</u>	<u>Description</u>
1)	10/10/2001	Bloomberg - 'Toxic' Loans re: <u>Isser Elishis</u>
2)	3/4/2002	Forbes - Toxic Stocks re: <u>Isser Elishis</u>
3)	4/02/2007	SEC - Counterfeiting <u>Stock 2.0</u>
4)	11/25/2010	Altitude Management - <u>Articles of Incorporation</u>
5)	4/18/2012	Altitude Management - <u>SEC Filing</u>
6)	2010-13	Summary of Waterton <u>Targets</u> and Trading <u>Activity</u>
7)	2010-13	Original Waterton <u>Network</u>
8)	4/4/2014	Gryphon Timeline and Trade Summaries by <u>House</u>
9)	2011-2017	Trading Records by House - <u>Scorpio</u> , <u>Sage</u> , <u>Fire River</u> and <u>Klondex</u>
10)	4/8/2014	BCSC - Timeline Prepared for Chris <u>Strother</u>
11)	6/2/2014	Market Surveillance in the 21st Century, <u>Dave Lauer</u>
12)	7/2014	Judge Zive replaces Judge Beesley (Need Docket No.)
13)	11/21/2014	J Whitney Refuting <u>IMC</u>
14)	2014	Scorpio - Mineral Ridge Geology Authored by Peter <u>Hawley</u>
15)	2/4/2015	BCSC - Summary of <u>Meeting</u>
16)	4/28/2015	PriceWaterhouseCoopers Working <u>Papers</u>
17)	4/28/2015	PriceWaterhouseCoopers Initial Report <u>SEALED</u>
18)	7/29/2015	Gryphon Trustees <u>COMPLAINT</u>
19)	10/30/15	OSC- Gryphon Gold <u>Update</u>
20)	11/20/2015	Order Dismissing <u>Bankruptcy</u>
21)	2/12/2016	BCSC - Joint Request to <u>MoF</u>
22)	3/9/2016	BCSC - Reply to Request to <u>MoF</u>
23)	5/2/2016	RGMP - Minority Shareholder Oppression <u>Part I, II, and III</u>
24)	3/3/2017	Gryphon Directors Verified <u>COMPLAINT</u> and Exhibits <u>I, II, III</u>
25)	5/25/2017	OSC, IMET, IIROC Case <u>Review</u>
26)	5/30/2017	IMET - Whistleblower <u>Update</u>
27)	6/8/2017	IMET - Request to Enforce the <u>Law</u>
28)	6/14/2017	IMET - Whistleblower #4 <u>Update</u>
29)	7/13/2017	BCSC, JSIU, IIROC - <u>Introductions</u>
30)	8/8/2017	DLA Piper - Nevada AG Request for <u>Investigation</u>
31)	8/8/2017	DLA Piper - DOJ Request for <u>Investigation</u>
32)	8/8/2017	DLA Piper - SEC Request for <u>Investigation</u>
33)	9/12/2017	DLA Piper - SEC Additional request for <u>Investigation</u>
34)	10/2017	Scorpio Net Trading Oct - Dec 2017 by <u>House</u>
35)	11/8/2017	DLA Piper - OSC Request for <u>Investigation</u>
36)	1/2/2018	Mineral Ridge Updated <u>43-101</u>
37)	2018	DLA Piper - Cast of <u>Characters</u>

- 38) 4/11/2018 RCMP - Taking a new [approach](#)
- 39) 4/12/2018 Former RPFL Partners - Request for [RBC policy](#)
- 40) 4/14/2018 IMET - The barriers that prevent [justice](#)
- 41) 4/26/2018 RGMP - Sandy Riley email justifying cause for [termination](#)
- 42) Undated CIBC Wood Gundy Advising and Trading [Policy](#)
- 43) 4/30/2018 RCMP - Advising of termination from [CIBC](#)
- 44) 5/9/2018 RCMP - New assays US\$60-70 million hidden in [pond](#)
- 45) 6/28/2018 DLA Piper - OSC Waterton Loans Case [Review](#)
- 46) 6/30/2018 SSOF - Steve Craig Summary of Waterton Mines in SSOF [Portfolio](#)
- 47) 6/30/2018 WPMF II Link to Public Co [Targets](#)
- 48) 7/6/2018 RCMP - Seeking [advice](#)
- 49) 7/19/2018 Order Appointing [Custodian](#)
- 50) 7/27/2018 Gryphon vs. Waterton Civil [COMPLAINT](#)
- 51) 9/12/2018 Gryphon Directors 1st Amended Verified [COMPLAINT](#)
- 52) 9/13/2018 DLA Piper - Letter to [BCSC](#)
- 53) 9/13/2018 DLA Piper - Letter to [RCMP](#)
- 54) 9/18/2018 RCMP - Supt. Doran promises new [mandate](#)
- 55) 9/26/2018 RCMP - Supt. Doran, Working together to enact [change](#)
- 56) 9/27/2018 RCMP - Supt. Doran referral to Chief Supt. [Mark Flynn](#)
- 57) 9/28/2018 Scorpio - A win-win [scenario](#)
- 58) 1/8/2019 Scorpio - Final Offer to [Waterton](#)
- 59) 1/22/2019 CIBC - Notice of [Civil Clami](#)
- 60) 3/5/2019 Waterton bank account No. at CIBC [FirstCaribbean](#)
- 61) 4/5/2019 DLA Piper - Request for Special [Committee](#)
- 62) 4/5/2019 HudBay Investor [Presentation](#)
- 63) 5/5/2019 Gryphon 2nd Amended Complaint Press [Release](#)
- 64) 6/19/2019 BCSC - Recommended Regulatory [Reform](#)
- 65) 7/3/2019 RCMP - Why is there no [reply](#)
- 66) 7/4/2019 RCMP - Following up on request to Supt. [Doran](#)
- 67) 7/10/2019 RCMP - 3rd Request to Scott [Doran](#)
- 68) 7/17/2019 BCSC - DiFonzo Scorpio [Information](#)
- 69) 7/23/2019 RCMP - Why is there [no reply](#)
- 70) 7/25/2019 BCSC - Opens 2nd [Investigation](#)
- 71) 7/30/2019 Waterton CF Model for Mineral Ridge with link to [Tschabrun](#)
- 72) 7/31/2019 BCSC - Sting Operation at Scorpio Board [Meeting](#)
- 73) 8/5/2019 BCSC - Gryphon Reply to [Order](#)
- 74) 8/6/2019 Scorpio - Report of the Special [Committee](#)
- 75) 8/8/2019 RCMP - Thank you for introduction to [Vance Morgan](#)
- 76) 8/14/2019 IMET - Working together to enact [change](#)
- 77) 9/21/2019 RCMP - Request IMET participate in BCSC sting [operation](#)
- 78) 10/16/2019 State of Nevada - Order Granting Motion to [Dismiss](#)
- 79) 11/26/2019 BCSC, OSC, RCMP, IMET, IIROC - The Right Path [Forward](#)
- 80) 3/6/2020 BIM Defamation [affidavit #1](#)
- 81) 4/2/2020 Gryphon request for cooperation to [CIBC](#)
- 82) 4/2/2020 Gryphon request for cooperation to [A-P Capital](#)
- 83) 4/2/2020 Gryphon request for cooperation to [Hamilton Lane](#)
- 84) 4/13/2020 BIM - Conflicts of interest to [Alice Dunning](#)
- 85) 4/7/2020 Gryphon request for cooperation to [RGMP](#)
- 86) 4/15/2020 BIM advising CIBC, CEO, Ed Dodig & RGMP, CEO, [Andrew Marsh](#)
- 87) 4/21/2020 RGMP reply from [Lauren Shneer](#)

88) 4/22/2020 Custodian update to [Arthur West](#)
89) 4/27/2020 Arthur West reply to [Seth Adams](#)
90) 5/1/2020 R&K Karbownik - Reply to [RGMP](#)
91) 5/7/2020 D Bockhold - Request to CIBC and [RGMP](#)
92) 5/11/2020 Scorpio - P Hawley Request to Remove [Bockhold](#)
93) 5/22/2020 Gryphon attorney's reply to Arthur [West](#)
94) 5/22/2020 Benjamin Brown reply to a member to [Frank Wilson](#)
95) 5/22/2020 Benjamin Brown reply to a member of [R&K Karbownik](#)
96) 5/22/2020 Benjamin Brown reply to [David Lloyd](#)
97) 5/26/2020 Scorpio - DOJ Summary of [Evidence](#)
98) 5/28/2020 Arthur West - Reply to [Seth Adams](#)
99) 5/28/2020 Arthur West - Reply to [R&K Karbownik](#)
100) 5/28/2020 Karbownik's reply to [Art West](#)
101) 5/28/2020 BIM Committee - Request to IROC, VP, [Warren Funt](#)
102) 6/1/2020 Notice of Civil Claim [Bockhold v. Richardson GMP](#)
103) 6/3/2020 CIBC - Dunning confirming [Peverett in receipt](#)
104) 6/5/2020 BIM - Update to [Alice Dunning](#)
105) 6/25/2020 Custodian - Request to CIBC, [RGMP](#), AP and [Hamilton Lane](#)
106) 6/29/2020 BIM Committee - Request to CIBC, [RGMP](#), AP and [Hamilton Lane](#)
107) 7/6/2020 BIM Committee - Request to JRSL Chairman, [Carolyn Hursh](#)
108) 8/18/2020 US Bankruptcy Court - Motion to Unseal [Denied](#)
109) 9/22/2020 Harrington - Submission to the [Ontario Task Force](#)
110) 9/25/2020 DRAFT [Adversary Complaint](#)
111) 9/30/2020 Scorpio - Request for Fairness [Opinion](#)
112) 10/1/2020 GR Dawson - [Mitigating Risk](#)
113) 10/1/2020 GR Dawson - [Threat](#)
114) 10/2/2020 GR Dawson - [Heads Up](#)
115) 10/2/2020 Scorpio Board - The Right Path [Forward](#)
116) 10/5/2020 GR Dawson - Passing the [Torch](#)
117) 10/5/2020 Custodian Memo to Scorpio [Board](#)
118) 10/5/2020 IMET - Scorpio Gold shareholder [complaint](#)
119) 10/6/2020 IMET, BCSC - Custodian Memo to [Regulators](#)
120) 10/6/2020 Custodian - Request to [RCMP](#)
121) 10/7/2020 IMET - Advising evidence of Lock and Dawson [collusion](#)
122) 10/8/2020 BIM - Letter to RCMP Re: [Carolyn Hursh](#)
123) 10/12/2020 BIM Committee - Request to [RCMP](#)
124) 10/14/2020 Gryphon - [Press release](#)
125) 10/20/2020 Harris & Co. - Request to investigate [Scorpio](#)
126) 10/8/2020 RCMP - The Waterton Web of [Unlawfulness](#)
127) 10/8/2020 GR Dawson - Heads Up [#2](#)
128) 10/14/2020 TSX - Confirmation of Request to RCMP to halt Titan [transaction](#)
129) 10/16/2020 BCSC - Scorpio - '[Red Flags](#)'
130) 10/20/2020 BCSC - Request for Scorpio [Investigation](#)
131) 10/20/2020 BIM Committee - Request Scorpio Regulatory [Investigation](#)
132) 11/3/2020 State of Nevada Appeal - Opening [Brief](#)
133) 11/30/2020 Scorpio - F Wilson Letter to Special [Committee](#)
134) 12/11/2020 BIM Committee - Request to BCSC, [Peter Brady](#)
135) 12/15/2020 BCSC - Reply to [Don Walker](#)
136) 12/15/2020 BCSC, TMX - D Walker Request to [Investigate](#)
137) 12/16/2020 BCSC - Confirmation of [Investigation](#)

138) 2/18/2021 BIM - Letter to BC Attorney General and MoF
139) 3/8/2021 BIM - Request to AG and MoF
140) 3/23/2021 Harris & Co. - Request to BCSC and BC AG
141) 4/6/2021 BIM - Reply to AG and MoF
142) 4/7/2021 BC Minister of Finance - Reply to the BIM Committee
143) 4/7/2021 OSC - BIM reconnecting with Mike Hutchinson
144) 4/7/2021 IMET, OSC, IIROC - Advising of USTP presentation
145) 4/8/2021 BCSC - Case Assessment Disbanded
146) 4/13/2021 BCSC, OSC, IMET - Request to File Criminal Charges
147) 4/29/2021 BC Supreme Court - Defamation affidavit #1
148) 3/31/2021 Minister of Finance - Reply to the BIM Committee
149) 5/7/2021 USTP - Case Review
150) 5/19/2021 Eide Bailly - NCIC Notification
151) 6/12/2021 Gryphon - Reply to Hoekstra and Fumano at Vancouver Sun
152) 6/30/2021 IIROC - Rule 42 - Conflicts of Interest
153) 7/9/2021 State of Nevada Appeal - Order of Affirmance
154) 7/9/2021 BCSC - Request to present USTP Case Review
155) 11/23/2021 Documentary - The Dark Pond of Money
156) 11/26/2021 BCSC - Closes Scorpio Investigation
157) 1/20/2022 NCIC - Request for SEC Audit
158) 1/20/2022 ERS - Request for Cooperation
159) 1/21/2022 H,W&C - Request for SEC Audit
160) 1/26/2022 NCIC - Request for NPM Tax Confirmation
161) 1/28/2022 NCIC - Plaintiff or Defendant
162) 1/31/2022 ERS - Notification
163) 2/1/2022 KPMG - Request for SEC Audit
164) 2/3/2022 KPMG - ERS of the State of Hawaii
165) 2/4/2022 OSC - Request to not communicate with L Schneer
166) 2/7/2022 DRAFT - Custodian update to all parties
167) 2/10/2022 Trustee Lovato - Request for Referral to USTP
168) 2/12/2022 KPMG - Notification of Wrongdoing
169) 3/13/2022 Trustee Lovato - Request for Referral (DRAFT) to AG, DOJ, SEC and Endowments
170) 3/18/2022 Trustee Lovato - Request for Referral Reply
171) 3/18/2022 Nevada District Court - Notification of Custodianship lapsing
172) 4/8/2022 CIBC - Settlement with CIRO
173) 4/25/2022 CIBC - CIBC - Application Response CIBC v. Bockhold
174) 5/2/2022 BIM - Notice of Application Response CIBC v. CIBC v. Bockhold
175) 7/5/2022 BIM - RGMP Second Amended Notice of Civil Claim
176) 7/19/2022 SEC - Counterfeiting Stock 2.0
177) 12/19/2022 Harrington Global - Complaint
178) 1/12/2023 BIM Committee - CIBC Conflicts of Interest
179) 3/1/2023 BIM Committee - Request to IIROC
180) 3/13/2023 Bockhold - Defendants Trial Brief
181) 4/16/2-23 CIBC - Reply to Response to counterclaim
182) 4/13/2023 BIM - Recap of phone call with Romolo DiFonzo
183) 5/9/2023 BIM Committee - CIRO reply to request to investigate
184) 5/11/2023 CIBC - Notice of Application for Unresponsive document requests
185) 5/19/2023 OSC - Doug Steiner, please help set a precedent
186) 6/4/2023 Bockhold - Defendant's Answers to Requests

187)	6/7/2023	CIBC - Without Prejudice <u>Offer</u>
188)	6/7/2023	Gryphon Counsel supporting USTP <u>investigation</u>
189)	6/11/2023	RCMP - Request to subpoena Bockhold Re: CIBC <u>Unresponsive</u>
190)	6/14/2023	BCSC, IROC - Laura Gibbins, David vs. <u>Goliath</u>
191)	6/15/2023	OSC, RCMP - Laura Gibbins, David vs. <u>Goliath</u>
192)	6/15/2023	USTP - Case Review <u>Update</u>
193)	6/16/2023	BIM - Action Required: <u>Enforcing Policy</u>
194)	6/16/2023	CIBC - Request from <u>Highroads Medical Clinics</u>
195)	6/19/2023	Globe and Mail - Pervasive sales culture at <u>Canadian banks</u>
196)	6/21/2023	Bill Lyons - Cross <u>Examination</u>
197)	Undated	BIM Committee Ad run in <u>Financial Post</u>
198)	6/28/2023	BCSC - Don Walker Request for <u>Support</u>
199)	7/7/2023	SEC - Counterfeiting <u>Stock 2.0</u>
200)	7/14/2023	USTP - A Very Unfortunate New <u>Development</u>
201)	8/4/2023	All Parties - Laura Gibbins, David vs. <u>Goliath</u>
202)	8/8/2023	BCSC - Reply to Laura <u>Gibbins</u>
203)	9/11/2023	USTP - Request for <u>Referral</u>
204)	9/2023	CIBC - Minutes of <u>Settlement</u>
205)	9/28/2023	Harrington - Opinion and Order, Southern <u>District of NY</u>
206)	10/2/2023	Harrington - Warsaw Burstein Prevails Against CIBC, TD Bank and <u>Merrill Lynch</u>
207)	11/30/2023	Bloomberg - Korea Defends Short Sale Ban and Fines <u>Two Banks</u>
208)	11/30/2023	BofA - FINRA Spoofing Fine - <u>Merrill Lynch</u>
209)	12/9/2022	CIBC - Jean-Marc Discovery <u>Transcript</u>
210)	12/22/2023	Congress of the <u>United States</u>
211)	12/19/2023	BCSC - Appoints Warren Funt to board of <u>BCSC</u>
212)	12/22/2023	US. Congress - <u>MMTLP</u>
213)	12/24/2023	Korea Fines BNP Paribas and HSBC Holdings Plc <u>\$20.4 million</u>
214)	1/15/2024	BIM - Update to RCMP, DOJ with cc to <u>Deputy Prime Minister</u>
215)	1/15/2024	RCMP - Email to Sgt. <u>Faiz Ahmed</u>
216)	1/16/2024	BIM - Request to MLA <u>Jordan Sturdy</u>
217)	1/17/2024	RCMP, DOJ - Confidential <u>Request</u>
218)	1/17/2024	RCMP - Somethings not <u>adding up</u>
219)	1/19/2024	BIM - Request to MP Patrick <u>Weiler</u>
220)	2/5/2024	Harrington - Request to <u>MoF Freeland</u>
221)	2/5/2024	BIM Committee - Request to <u>Freeland and Weiler</u>
222)	2/22/2024	BIM - Request to Deputy Prime Minister <u>Freeland</u>
223)	3/7/2024	BIM - Request to BCSC <u>Peter Brady</u>
224)	3/7/2024	USTP - Case Review <u>Update</u>
225)	3/8/2024	BIM - Reply to BCSC <u>Peter Brady</u>
226)	3/8/2024	CIRO - Enforcement Hearing, Echelon Wealth <u>Partners</u>
227)	3/13/2024	BIM - Request to RCMP re: <u>Subpoena</u>
228)	3/15/2024	BIM - Request to <u>Premier Eby</u>
229)	3/15/2024	Save Canadian Mining - Letter to <u>MoF Freeland</u>
230)	3/19/2024	BIM - Notification to <u>Ernst & Young</u>
231)	3/20/2024	BIM - Request to Alberta Securities <u>Commission</u>
232)	3/20/2024	BIM - Request to BC MoF and <u>Attorney General</u>
233)	3/22/2024	MoF - Reply to <u>Harrington</u>
234)	3/22/2024	BIM - Notification to <u>KPMG</u>
235)	3/25/2024	BIM - Notification to <u>Deloitte</u>

236)	3/27/2024	BIM - Notification to <u>PwC</u>
237)	3/27/2024	CIBC - Notice of <u>Civil Claim</u>
238)	3/28/2024	BIM - EY 2nd Request for <u>support</u>
239)	3/30/2024	BIM - PwC 2nd Request for <u>support</u>
240)	4/8/2024	BIM - Deloitte 2nd Request for <u>support</u>
241)	4/9/2024	US Congress - Request to SEC Re: <u>Short Selling</u>
242)	4/12/2024	BIM - Submission to <u>CIRO and CSA</u>
243)	4/12/2024	Save Canadian Mining - Submission to <u>CIRO and CSA</u>
244)	4/12/2024	BIM - Request to <u>OSFI and CSA</u>
245)	4/15/2024	BIM - KPMG 2nd Request for <u>support</u>
246)	4/16/2024	John Welborn Dartmouth College - A Short History of <u>Short Selling</u>
247)	4/19/2024	CNN - Trump Media warns Nasdaq of suspected market <u>manipulation</u>
248)	4/23/2024	Trump Media letter to US House of <u>Representatives</u>
249)	4/24/2024	BIM - CIRO A friendly <u>heads up</u>
250)	4/24/2024	Bloomberg - South Korea to Implement Short Monitoring <u>System</u>
251)	5/4/2024	CIRO - Instinet (DMA) Fine for naked short <u>selling</u>
252)	5/13/2024	BIM - Request to Ernst & Young OMP, <u>Kevin Brennan</u>
253)	5/14/2024	EY -Reply to <u>BIM</u>
254)	5/27/2024	Deloitte - 3rd request for <u>support</u>
255)	5/27/2024	KPMG - 3rd request for <u>support</u>
256)	5/27/2024	PwC - 3rd request for <u>support</u>
257)	6/24/2024	BIM Committee - Request to all <u>parties</u>
258)	6/26, 2024	BIM - Advising Don Walker of Magna short <u>campaign</u>
259)	6/30/2024	Investopedia - Why Is Short Selling Illegal in <u>Some Countries?</u>
260)	7/5/2024	CIRO - Reply to BIM <u>Committee</u>
261)	7/18/2024	CIBC Notice of Application <u>CIBC v. Bockhold</u>
262)	7/23/2024	BIM communication with <u>Blakes</u>
263)	7/29/2024	John Chisholm requesting a response from the <u>OPO</u>
264)	8/16/2024	IMET - Reply to BIM 'Our office will not respond' to <u>further emails</u>
265)	8/20/2024	BIM - Request to <u>All Parties</u>
266)	8/23/2024	BIM - Amended Response to <u>Civil Claim</u>
267)	8/23/2024	Blakes - Requisition for summary judgment by <u>CONSENT</u> .
268)	9/1/2024	BIM - Request to OSC Enforcement, <u>Lauren Schmeer</u>
269)	9/5/2024	BIM - Advising Blakes of a pattern of <u>misrepresentations</u>
270)	9/6/2024	OSC - Doug Steiner advising of Application <u>Response</u>
271)	9/6/2024	OSC - Reply from Acting Manager, <u>Katrina Gustafson</u>
272)	9/9/2024	Blakes - Denying filed hearing by <u>CONSENT</u>
273)	9/13/2024	OSC - Request to Acting Manager, <u>Katrina Gustafson</u> .
274)	9/13/2024	BIM - Application Response <u>affidavit</u> .
275)	9/17/2023	Application Response filed in <u>BC Supreme Court</u> .
276)	9/20/2024	OSC - Request for D Steiner <u>support</u> .
277)	10/4/2024	BIM - Request to Blakes for <u>documents</u> .
278)	10/20/2024	Quantum BioPharma - <u>Complaint filed</u> .
279)	10/11/2014	BIM - 'Mitigating Risk' to CIBC, Park Place Mgr, <u>Human Alghabi</u> ..
280)	10/18/2024	BIM - Request to Blakes for <u>Unresponsive documents</u> .
281)	10/19/2024	BIM - Update to CIBC, Director Governance & Controls, <u>B Brown</u> .
282)	10/21/2024	BIM - Request to CIBC Dir. of ESG, <u>Alice Dunning</u> .
283)	10/22/2024	BIM - Request to CIBC and <u>Blakes</u>
284)	10/22/2024	BIM Committee - Email to A Dunning <u>blocked</u> .
285)	10/24/2024	Blakes - Setting hearing for Nov. 22 and denying being <u>unresponsive</u> .

286) 10/25/2024 BIM - Notice of filings to Peter Brady.
287) 10/25/2024 BIM Committee - Another request to Alice Dunning blocked.
288) 10/26/2024 BIM - Registered mail to CIBC Director of ESG, Alice Dunning.
289) 10/27/2024 BIM Committee - Why didn't CW fill 3 openings at trail.
290) 10/28/2024 BIM - Update to BCSC - Smith and Wu.
291) 10/28/2024 BIM Committee - Request to W Funt to file affidavit .
292) 10/29/2024 BIM - Request to Ernst & Young OMP, Kevin Brennan.
293) 10/29/2024 BIM - BCSC, Gordon Smith acknowledges receipt.
294) 10/30/2024 BIM - Registered Mail to Alice Dunning 'Return to sender'.
295) 11/1/2024 BIM Committee - B Brown acknowledges receipt.
296) 11/5/2024 BIM - Request to BCSC Executive Director, Peter Brady.
297) 11/5/2024 BIM - Providing copy of updated USTP Case Review
298) 11/6/2024 BIM - Request to BCSC Commissioners Funt & Kershaw.
299) 11/6/2024 CW - BIM request to Colson Winterstein to sign new retainer.
300) 11/6/2024 OSC - Doug Steiner request to arrange meeting with IMET.
301) 11/6/2024 OSC - Doug Steiner request to report BCSC to OSC.
302) 11/7/2024 BIM - Request to Colson Winterstein LLP.
303) 11/7, 2024 CW - Reply to request for affidavit
304) 11/7/2024 BIM - Request to BCSC Sn. Investigator, Sammy Wu.
305) 11/8/2024 BIM - Request to BCSC Sn. Legal Counsel, Gordon Smith.
306) 11/8/2024 BCSC - Declines request and restricts communication.
307) 11/18/2024 CW - C Hursh served on June 1, 2023.
308) 11/12/2024 Torys - Notification of intent to self-represent.
309) 2024 Would naked short selling be allowed in residential real estate.



BAD Market Manipulation Report

This is Exhibit "3" referred to in
the Affidavit of Murray Backhold
sworn to before me at Whistler
in the Province of British Columbia
this 11 day of November, 2024

W. J. J. J.

A Commissioner for taking Affidavits
in and for the Province of British Columbia

Badger Daylighting Manipulation Analysis

Methods

This section provides a high-level overview of the metrics that we calculated to measure the quoting and trading activity we were looking for. While this is a high-level overview, we would be happy to provide a much more detailed explanation if requested.

Data

Urvin sourced market data from a third-party provider. They provided us full depth-of-book snapshots by order for Canadian market data. Canadian Market data included every exchange in Canada¹. Further, we acquired Time and Sales data for all Canadian exchanges. Our analysis runs from April 3, 2017 through June 30, 2017. We also start our measurement at 9:35am, as the opening auction added too much noise.

Canadian market data has a Broker ID to attribute both quotes and trades. While we assign every individual order and trade to the corresponding party, trading and quoting can also be done through the Anonymous ID (1). The analyses can be greatly improved if the full deanonymized order histories are acquired for the sample period, as 26% of all trading was done through ID #1.

Order Activity

From the market by order data, we track the life of orders placed by each Broker ID until they no longer appear in the order book data (representing a fill or cancel). From the first and last timestamps as well as the first and last levels in the order book, we determine the order life and whether they were filled or canceled away from the best bid or offer. We then align the trade data with the order data to describe the

¹ Canadian Exchanges analyzed include: Aequitas NEO, Aequitas Lit, CSE, TSX Alpha, Nasdaq CSC, Nasdaq CS2, TSX Venture Exchange and the Toronto Stock Exchange.

characteristics of the market at each order book update as well as before, at and after each trade time.

Spoofing

While there are multiple types of order spoofing, the overall goal is the same: a market participant attempts to gain an unfair advantage by placing orders that they do not intend to execute in order to influence either a security's price or the behavior of other market participants. Spoofing occurs when a market participant temporarily distorts the price or quantity by "submitting multiple or large orders to trade, often away from the [best bid or offer] on one side of the order book, in order to execute a trade on the other side of the order book. Once the trade has taken place, the orders with no intention to be executed shall be removed."² The advantage obtained by the spoofer comes from the false signal that the spoofer sends to the market indicating that there is more interest on one side of the order book than would otherwise exist, and creating an unbalanced order book. As a result of the spoofer's actions, the spoofer materially benefits at the expense of other market participants.

Spoofing Definitions

- **Spoof-to-Buy:** in which a participant places sell orders that they do not intend to execute in order to cause a reaction in the market (driving down the current price) which allows the participant to execute a buy order at a more advantageous price than the participant would have been able to obtain otherwise.
- **Spoof-to-Sell:** in which a participant places buy orders that they do not intend to execute in order to cause a reaction in the market (driving up the current price) which allows the participant to execute a sell order at a more advantageous price than the participant would have been able to obtain otherwise.

A similar type of market manipulation is called Layering, in which multiple resting orders at different prices are used to also create this false demand. Our analysis will catch this type of manipulation.

Another type of market manipulation uses fleeting or flashing orders to momentarily create artificial demand, knowing that high-speed trading systems will still be able to

² <https://www.marketconductrules.com/risks/layering-and-spoofing.html#definition>

see and react to this demand despite order lifetimes that can be measured in milliseconds. Our analysis will catch this type of manipulation as well.

Market Reactions to Manipulation

While the precise reaction of other market participants cannot be determined *ex ante*, we identify two common market reactions in which a spoofer gains an advantage.

1. **Best Bid/Ask Improvement:** in which the spoofer's false orders cause market participants to react by placing new orders at a better price on the spoofed side of the order book. In this case, the spoofer is able to improve the price at which they can transact as a result of the better price on the spoofer's real intended trading side.
2. **Mid-Price Improvement:** in which the spoofer's false orders cause market participants to cancel orders on the opposite side of the order book from the spoofed side, thus giving the spoofer a greater price-time priority advantage on the side of the order book at which the spoofer intends on executing.

Spoofing Identification

Our analysis focuses on Spoof-to-Buy orders as those manipulate the selling activity of other market participants and artificially manipulate the price down, so that sellers sell at less advantageous prices than they otherwise should. We identify spoofing behavior which satisfies the above definitions, and which is followed by one or more of the above market reactions, by examining the order activity in the periods immediately before and after a trade occurs for a particular Broker ID. We define the two periods as follows.

- **Spoofing Period:** for a Spoof-to-Buy, within a window starting 5 seconds prior to the trade and ending at the trade time, the spoofing Broker ID places one or more Sell orders above the eventual executed Buy price, which are then cancelled unexecuted during the Cancellation Period.
- **Cancellation Period:** for a Spoof-to-Buy, starting 50 milliseconds prior to the trade and ending 5 seconds after the trade, the spoofing Broker ID cancels any Sell orders placed during the spoofing period.

We then look for anomalous order activity to one side of the order book during the Spoofing Period. The following two Size Conditions must be satisfied.

- **Total Size Condition:** for a Spoof-to-Buy, the sum of the sizes of all Sell orders placed by the spoofing Broker ID, and which satisfy the conditions of Spoofing Period, is greater than 4 times the average trade size for that day.
- **Size Imbalance Condition:** for a Spoof-to-Buy, the sum of the sizes of all Sell orders placed by the spoofing Broker ID satisfying the previous condition must be greater than the sum of the sizes for all Buy orders placed by the spoofing Broker ID during the Spoofing Period.

Lastly, we look for one of the described market reactions to occur between the time spoofing orders are placed and the executed trade. For each Broker ID, we assign a label to each trade for which that broker was the Buyer according to the following rules.

- **No Spoof:** trades in which either (1) the above Size Conditions were not satisfied, or (2) if the Size Conditions were satisfied but none of the below conditions are satisfied.
- **Spoof-to-Buy BBO:** in which the Size Conditions were satisfied and, after the spoofing broker's orders were placed during the Spoofing Period, other market participants placed Sell orders lower than the Best Ask at the time the spoofing broker's orders were placed.
- **Spoof-to-Buy Mid-Price:** in which the Size Conditions were satisfied and the mid-price decreased from the time the spoofing broker's orders were placed until the time trade occurred.

Results

Spoofing Impact

In order to assess the effects that the various Spoof-to-Buy reactions had on market prices and behavior, we look at the differences between price activity during the Spoofing Period and at 5-minutes after the execution of the Spoof-to-Buy trades.

Pre-Trade Price Change

- **No Spoof:** we take the mid-price movements from 5 seconds prior to the trade to the time of the trade.
- **Spoof-to-Buy BBO:** we take the Best Ask movements from the time spoofing began during the Spoofing Period to the time of the trade.

- Spoof-to-Buy Mid-Price: we take the mid-price movements from the time spoofing began during the Spoofing Period to the time of the trade.

Post-Trade Price Change

For all trade labels, we take the mid-price movement from the time of the execution to 5 minutes after the trade occurs.

Results:

Spoof Condition	Count	Pre-Trade Price Chg	1-min Post-Trade Price Chg (BP)	P-value 1-min	5-min Post-Trade Price Chg (BP)	P-value 5-min
No Spoof	104,825	-0.25	0.1	-	-0.9	-
Spoof-Buy BBO	560	-14.6	-13.5	< 0.0001	-6.9	0.027
Spoof-Buy Mid-Price	98	-7.8	-41.1	< 0.0001	-11.8	0.09

Table 1: Average Pre- and Post-Trade Price Changes by Spoof Type

The above table shows the average price changes, in basis points, during the Spoofing Period and at 1-minute and 5 minutes after the trade occurs. All of these results have p-values that show they are statistically significant. The most frequent spoof type, BBO, also has the largest pre-trade price impact of -14.6 basis points. Both types of spoofing show significant post-trade price impact at 1-minute after the trade, and clear price impact as far as 5 minutes after the trade

These results suggest an extremely low probability that the price changes in each of the Spoof-to-Buy BBO and Mid-Price labels could have been randomly obtained from the same generating process as the price changes in the No Spoof label. These results imply that the market impact of spoofing is both materially and statistically significant.

Analysis

Over the analysis period of April 3, 2017 through June 30, 2017, we had 62 days, and we saw Spoof-to-Buy orders on 91.9% of those days (57 out of 62 days). The median day saw 7 separate events.

This chart illustrates the daily activity by type of Spoof-to-Buy reaction:

Spoof-Buy BBO and Spoof-Buy Mid

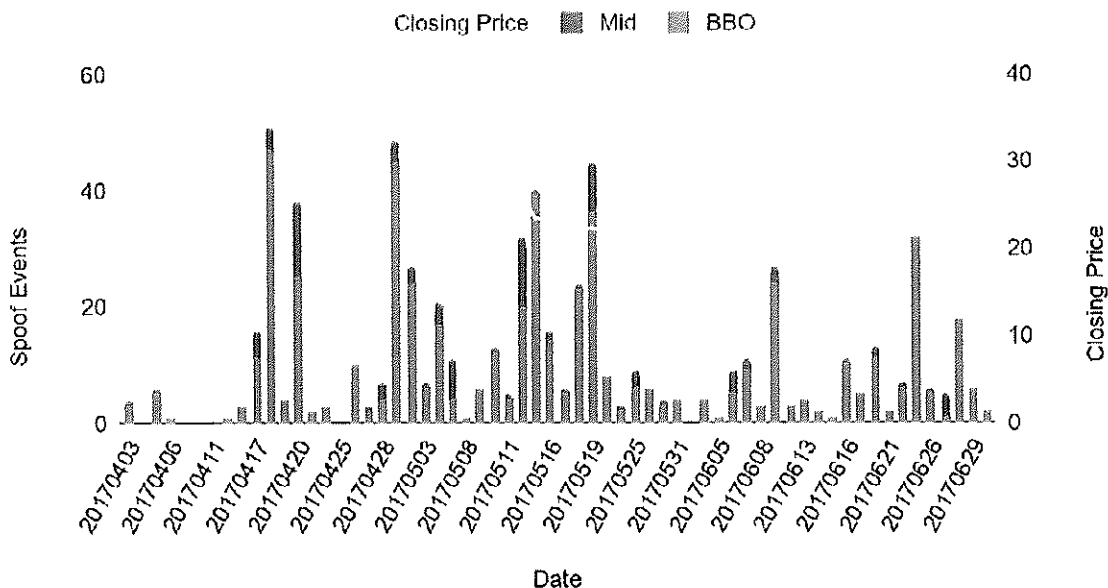


Figure 1: Spoof Event Count by Type, April 3, 2017 - June 30, 2017

Importantly, we can see spoofing activity throughout nearly the entire period.

Breaking out the results by broker, we see most spoofing activity under the Anonymous ID:

BID	Spoof-Buy BBO	Spoof-Buy Mid	Total Spoof Shares
Anonymous	488	79	90900
Merrill Lynch Canada Inc.	46	15	13300
CIBC World Markets, Inc.	20	3	8308

Table 2: Spoof Event Count and Shares by Type, by Broker

While we are able to show that there are many daily spoofing events, how much of the trading volume do we think is affected by these events? To answer this question, we have looked at trading volume in two ways.

The first is to look at the actual spoof trades themselves. Even with this narrow view, we see a material percentage of volume is accounted for just by the spoofing trades themselves. 22.5% of days (14 out of 62) have trading volume attributable to Spoof-to-Buy trades of more than 1% of all trading volume, with a maximum of 5.28% of volume on April 18, 2017.

Another way of looking at spoofing volume is to look at the total shares traded during the period of time where Spoof-to-Buy activity is artificially depressing the stock price. From this perspective, we see that a significant amount of volume is being traded at manipulated prices.

We showed in Table 1 above that there are statistically significant negative price impacts from two of the spoofing types - Spoof-to-Buy BBO and Spoof-to-Buy Mid - out to 5 minutes after the spoof event takes place. Calculating the amount of trading volume that takes place during these spoof events shows that for the entire period, 12.4% of all trading volume is traded at manipulated prices, and that 30.6% of all trading days have trading volume where over 10% of all volume is traded at manipulated prices. On May 19, 2017, 34.1% of volume traded at manipulated prices, a day where the price of BAD fell by 117.4 basis points.

While these numbers are high, it is important to note that there continues to be a high amount of Anonymous trading. With de-anonymized data, we could complete this analysis and confirm these results. However, as can be seen in the illustrative examples below, the evidence is good that many of these incidents are difficult to explain in any other way.

One final area of analysis is our examination of trading activity relative to shares outstanding. Figure 4 below shows monthly trading volume, shares outstanding, and the percentage of trading volume relative to shares outstanding.

Outstanding Shares and Trading Volume

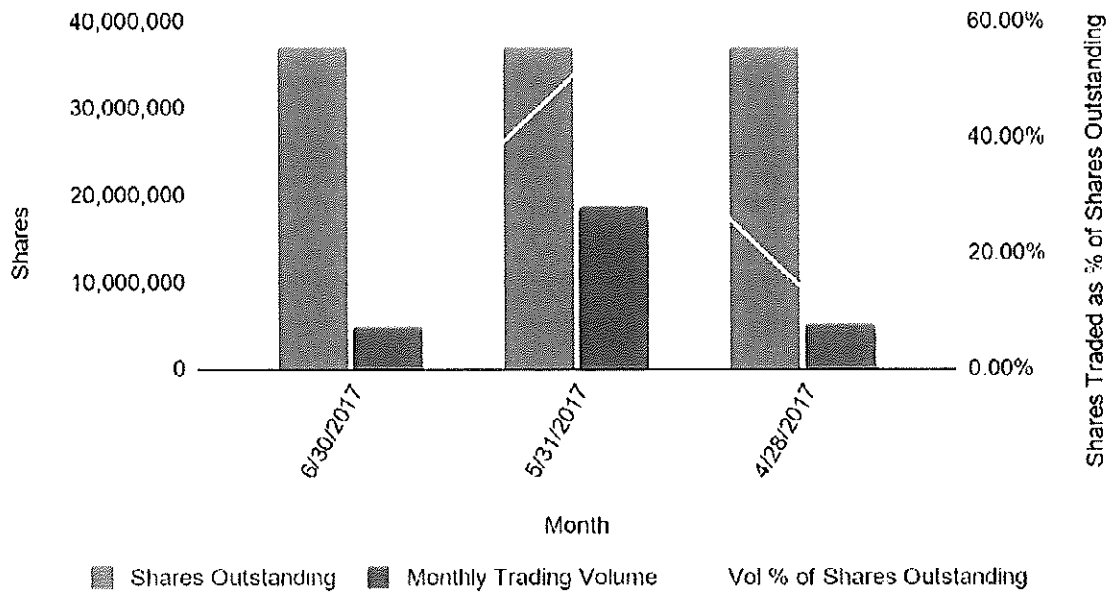


Figure 2: Percentage of Trading Relative to Shares Outstanding - April 2017 - June 2017

We immediately see a significant peak in May 2017, where total trading volume was more than half the shares that were outstanding, corresponding to a drop of 28% in the stock price.

Date	Shares Outstanding	Monthly Trading Volume	Vol % of Shares Outstanding
4/28/2017	37,100,681	5,136,200	13.84%
5/31/2017	37,100,681	18,866,449	50.85%
6/30/2017	37,100,681	5,024,935	13.54%

Table 3: Monthly Trading Details

Finally, reproduced in table 4 below are the number of shares traded, by broker, over the entire analysis period. We have only included brokers that traded more than two hundred thousand shares.

Broker	Shares Traded
Anonymous	15,096,001
Cormark Securities Inc./Valeurs Mobilières Cormark Inc.	8,593,193
ITG Canada Corp.	5,476,391
CIBC World Markets Inc.	5,010,771
TD Securities Inc.	4,911,657
RBC Capital Markets	3,325,062
Canaccord Genuity Corp.	2,995,417
Instinet Canada Ltd.	1,828,659
Morgan Stanley Canada Ltd.	1,687,060
Scotia Capital Inc.	1,285,509
Merrill Lynch Canada Inc.	1,102,740
BMO Nesbitt Burns Inc.	778,769
Goldman Sachs Canada Inc.	619,884
Acumen Capital Finance Partners Ltd.	547,514
National Bank Financial Inc.	540,880
Barclays Capital Canada Inc.	502,400
Raymond James Ltd.	487,731
Peters & Co. Ltd.	439,730
Laurentian Bank Securities Inc.	396,121
UBS Securities Canada Inc./UBS Valeurs Mobilières Canada Inc.	280,479
Credit Suisse Securities (Canada), Inc.	217,803
GMP Securities Limited	213,947
Macquarie Capital Markets Canada Ltd.	205,183

Table 4: Total Trading By Broker

Examples

In order to illustrate the behavior we have defined and described above, we have pulled out some examples of each. The sequences of events described in these

examples are nearly impossible to attribute to any other motive or behavior, and we are confident they describe market manipulation activity. Given a fully deanonymized dataset, we could speak with even greater certainty, but we do not believe such certainty is necessary when examining these events. Furthermore, the statistical methods that we have developed have identified 723 examples of such manipulation over the analysis period.

Spoof-to-Buy BBO

Prior to 3 trades occurring on 2017-05-12 09:46:38.127 for a total size of 500 shares, at the prices of \$23.74, \$23.77, and \$23.78 for which the Anonymous ID was the buyer, an Anonymous seller placed 6 sell orders above the execution price for a total size of 10,800 shares, representing over 22 times the average trade size for that day. These orders coincided with a 12.5 basis point drop in the Best Ask price. After the executions were completed, all 6 sell orders were cancelled. The mid-price continued to decline from its pre-spoof price level by 80 basis points for the next 15 minutes.

Prior to 3 trades occurring on 2017-05-12 14:55:08.932 through 14:55:08.986 for a total size of 700 shares, at the prices of \$26.07, \$26.03, and \$26.02 for which the Anonymous ID was the buyer, an Anonymous seller placed 6 sell orders above the execution price for a total size of 3,700 shares, representing over 7 times the average trade size for that day. These orders coincided with a 38 basis point drop in the Best Ask price. After the executions were completed, all 6 sell orders were cancelled. The mid-price continued to decline from its pre-spoof price level by 40 basis points for the next 5 minutes.

Prior to 1 trade occurring on 2017-05-19 10:40:28.714 for a total size of 100 shares, at the price of \$22.12 for which Merrill Lynch Canada Inc was the buyer, a Merrill seller placed 3 sell orders above the execution price for a total size of 3,000 shares, representing over 16 times the average trade size for that day. These orders coincided with a 4 basis point drop in the Best Ask price. After the executions were completed, all 3 sell orders were cancelled. The mid-price continued to decline from its pre-spoof price level by 45 basis points for the next 15 minutes.

Spoof-to-Buy Mid-Price

Prior to 3 trades occurring on 2017-05-19 15:21:23.516 through 15:21:23.560 for a total size of 300 shares across two exchanges, at the price of \$22.40, for which the Anonymous ID was the buyer, an Anonymous seller placed 9 sell orders above the

execution price for a total size of 1,300 shares, representing over 6 times the average trade size for that day. These orders coincided with a 2 basis point drop in the Mid Price. After the executions were completed, all 9 sell orders were cancelled. The mid-price continued to decline from its pre-spoof price level by 14 basis points for the next 15 minutes.

Prior to 2 trades occurring on 2017-05-19 12:13:02.135 for a total size of 900 shares, at the price of \$22.12 for which Merrill Lynch Canada Inc was the buyer, a Merrill seller placed 3 sell orders above the execution price for a total size of 3,000 shares, representing over 16 times the average trade size for that day. These orders coincided with a 2 basis point drop in the Best Ask price. After the executions were completed, all 3 sell orders were cancelled. The mid-price remained depressed from its pre-spoof price level for the next 5 minutes.

US Imbalance Pairings - 7/15/2024

Participating Broker-Dealers	Shares
National Financial Services Corporation (Broadridge)	2,222,336
National Financial Services Corporation (DTC)	1,382,278
Subtotal	(840,058)
Charles Schwab & Co. (Broadridge)	10,509,476
Schwab (Charles) & Co., Inc. (DTC)	10,022,584
Subtotal	(486,892)
Pershing LLC (Broadridge)	958,296
Pershing, L.L.C. (DTC)	613,052
Subtotal	(345,244)

Total US Imbalances (1,672,194)

This is Exhibit "4" referred to in the Affidavit of Murray Backhold sworn to before me at Whistler in the Province of British Columbia this 21 day of November, 2024

[Signature]

CA Imbalance Pairings - 7/15/2024
in and for the Province of British Columbia

Participating Broker-Dealers	Shares
FIDELITY CLEARING CANADA ULC	3365600
FIDELITY CLEARING CANADA ULC	345282
Share Total	(3,020,318)
NATIONAL BANK FINANCIAL	5310969
NBF INC	4939047
Share Total	(371,922)
TD WATERHOUSE	28963001
TD WATERHOUSE CANADA INC.	28761314
Share Total	(201,687)
RAYMOND JAMES LTD.	7108783
RAYMOND JAMES LIMITED	6989703
Share Total	(119,080)
RBC DOMINION SECURITIES INC	11099472
RBC DOMINION SECURITIES INC	10988420
Share Total	(111,052)
BMO NESBITT BURNS INC.	4496076
BMO NESBITT BURNS INC.	4417576
Share Total	(78,500)
CIBC WORLD MARKETS INC.	8123507
CIBC WORLD MARKETS INC.	8069484
Share Total	(54,023)

Total CA Imbalances (3,956,582)

Unpaired Canadian Broadridge**	
FIRM	SHARES
INVESTORS GROUP SECURITIES INC	23346
MD MANAGEMENT LIMITED	13034

Unpaired Depository CDS*	
FIRM	SHARES
DEPOSITORY TRUST COMPANY	18379266
INTERACTIVE BROKERS CANADA INC	9263093

Unpaired US Broadridge**	
FIRM	SHARES
JP MORGAN CHASE	605000
EUROCLEAR UK & IRELAND	182904
Morgan Stanley & Co. Inc.	112000
PERSHING SECURITIES LIMITED	93415
SAXO	22650
RBC Capital Markets Corporation	9036

Unpaired Depository DTC*	
FIRM	SHARES
* FIDELITY**	3020318
* National Bank Financial	406876
* TD Waterhouse Canada Inc./CDS	239436
CREST International Nominees Limited	182904
* Raymond James Ltd./CDS	119080
* RBC Dominion Securities Inc./CDS	117582
* BMO Nesbitt Burns Inc./CDS	78500
Interactive Brokers L.L.C./Retail Clearance	56084
* CIBC World Markets Inc./CDS	30300
Haywood Securities Inc./CDS	30000

Notes:

* DTCC/CDS positions without connection to a Broadridge report may be claimed by the broker to be available to cover any reported imbalance. That would only be correct if the broker advises and affirms in writing that the shares:

Are not for beneficial owners of their firm in another jurisdiction; have not been loaned out; are a true position of the firm's trading inventory to facilitate market making and contribute to market liquidity.

** Unpaired Broadridge values (having no depository shares to pair off) are viewed as actual imbalances and should be counted with total imbalances that are reported.

US Imbalance Pairings - 7/31/2024

Participating Broker-Dealers	Shares
National Financial Services Corporation (Broadridge)	2,319,293
National Financial Services Corporation (DTC)	1,494,533
Subtotal	(824,760)
Charles Schwab & Co. (Broadridge)	10,786,843
Schwab (Charles) & Co., Inc. (DTC)	10,246,556
Subtotal	(540,287)
Pershing LLC (Broadridge)	984,306
Pershing, L.L.C. (DTC)	639,062
Subtotal	(345,244)

CA Imbalance Pairings - 7/31/2024

Participating Broker-Dealers	Shares
FIDELITY CLEARING CANADA ULC	3486300
FIDELITY CLEARING CANADA ULC	465982
Share Total	(3,020,318)
NATIONAL BANK FINANCIAL	5117608
NBF INC	4746765
Share Total	(370,843)
TD WATERHOUSE	29061196
TD WATERHOUSE CANADA INC.	28800916
Share Total	(260,280)
RAYMOND JAMES LTD.	7087200
RAYMOND JAMES LIMITED	6968120
Share Total	(119,080)
RBC DOMINION SECURITIES INC	11088253
RBC DOMINION SECURITIES INC	10973798
Share Total	(114,455)
BMO NESBITT BURNS INC.	4631986
BMO NESBITT BURNS INC.	4553486
Share Total	(78,500)
CIBC WORLD MARKETS INC.	8335944
CIBC WORLD MARKETS INC.	8285344
Share Total	(50,600)

Total US Imbalances	(1,710,291)
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Total CA Imbalances	(4,014,076)
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Unpaired Canadian Broadridge**	
FIRM	SHARES
INVESTORS GROUP SECURITIES INC	23346
MD MANAGEMENT LIMITED	13000

Unpaired Depository CDS*	
FIRM	SHARES
DEPOSITORY TRUST COMPANY	18655335
INTERACTIVE BROKERS CANADA INC	9114043
MERRILL LYNCH CDA INC	32687

Unpaired US Broadridge**	
FIRM	SHARES
JP MORGAN CHASE	605000
EUROCLEAR UK & IRELAND	194904
Morgan Stanley & Co. Inc.	114500
PERSHING SECURITIES LIMITED	93415
SAXO	20000
RBC Capital Markets Corporation	9036

Unpaired Depository DTC*	
FIRM	SHARES
* FIDELITY**	3020318
* National Bank Financial	406947
* TD Waterhouse Canada Inc. /CDS	263906
CREST International Nominees Limited	194904
* Raymond James Ltd./CDS	119080
* RBC Dominion Securities Inc./CDS	117582
* BMO Nesbitt Burns Inc./CDS	78500
Interactive Brokers L.L.C./Retail Clearance	52792
Haywood Securities Inc. /CDS	30000
QUES/CDS**	16500

Notes:

· * DTCC/CDS positions without connection to a Broadridge report may be claimed by the broker to be available to cover any reported imbalance. That would only be correct if the broker advises and affirms in writing that the shares:

Are not for beneficial owners of their firm in another jurisdiction; have not been loaned out; are a true position of the firm's trading inventory to facilitate market making and contribute to market liquidity.

** Unpaired Broadridge values (having no depository shares to pair off) are viewed as actual imbalances and should be counted with total imbalances that are reported.

US Imbalance Pairings - 8/15/2024

Participating Broker-Dealers	Shares
National Financial Services Corporation (Broadridge)	2,329,360
National Financial Services Corporation (DTC)	1,505,147
Subtotal	(824,213)
Charles Schwab & Co. (Broadridge)	11,290,424
Schwab (Charles) & Co., Inc. (DTC)	10,724,932
Subtotal	(565,492)
Pershing LLC (Broadridge)	1,089,172
Pershing, L.L.C. (DTC)	663,928
Subtotal	(425,244)

CA Imbalance Pairings - 8/15/2024

Participating Broker-Dealers	Shares
FIDELITY CLEARING CANADA ULC	3,926,890
FIDELITY CLEARING CANADA ULC	901,572
Share Total	(3,025,318)
NATIONAL BANK FINANCIAL.	5,135,270
NBF INC	4,763,987
Share Total	(371,283)
TD WATERHOUSE	29,156,318
TD WATERHOUSE CANADA INC.	28,872,340
Share Total	(283,978)
RAYMOND JAMES LTD.	7,021,240
RAYMOND JAMES LIMITED	6,902,160
Share Total	(119,080)
RBC DOMINION SECURITIES INC	11,203,365
RBC DOMINION SECURITIES INC	11,096,025
Share Total	(107,340)
BMO NESBITT BURNS INC.	4,670,886
BMO NESBITT BURNS INC.	4,592,386
Share Total	(78,500)

Total US Imbalances (1,814,949)

Total CA Imbalances (3,985,499)

Unpaired Canadian Broadridge**	
FIRM	SHARES
INVESTORS GROUP SECURITIES INC	23346
MD MANAGEMENT LIMITED	13000

Unpaired Depository CDS*	
FIRM	SHARES
DEPOSITORY TRUST COMPANY	18948450
INTERACTIVE BROKERS CANADA INC	8701499
MERRILL LYNCH CDA INC	34095

Unpaired US Broadridge**	
FIRM	SHARES
JP MORGAN CHASE	605000
EUROCLEAR UK & IRELAND	214904
Morgan Stanley & Co. Inc.	116500
PERSHING SECURITIES LIMITED	93415
SAXO	22650
CIBC CAPITAL MARKETS	16500
CIBC World Markets Corp.	16500

Unpaired Depository DTC*	
FIRM	SHARES
* FIDELITY**	3011318
* National Bank Financial	407068
* TD Waterhouse Canada Inc. /CDS	283506
CREST International Nominees Limited	214904
* RBC Dominion Securities Inc./CDS	122785
* Raymond James Ltd./CDS	119080
* BMO Nesbitt Burns Inc./CDS	78500
Interactive Brokers L.L.C./Retail Clearance	52292
Haywood Securities Inc. /CDS	30000

Notes:

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** Unpaired Broadridge values (having no depository shares to pair off) are viewed as actual imbalances and should be counted with total imbalances that are reported.

US Imbalance Pairings - 8/30/2024

Participating Broker-Dealers	Shares
National Financial Services Corporation (Broadridge)	2,403,834
National Financial Services Corporation (DTC)	1,574,705
Subtotal	(829,129)
Charles Schwab & Co. (Broadridge)	11,622,475
Schwab (Charles) & Co., Inc. (DTC)	11,034,391
Subtotal	(588,084)
Pershing LLC (Broadridge)	1,110,217
Pershing, L.L.C. (DTC)	684,973
Subtotal	(425,244)

CA Imbalance Pairings - 8/30/2024

Participating Broker-Dealers	Shares
FIDELITY CLEARING CANADA ULC	3,983,890
FIDELITY CLEARING CANADA ULC	979,072
Share Total	(3,004,818)
NATIONAL BANK FINANCIAL	5,151,427
NBF INC	4,780,102
Share Total	(371,325)
RBC DOMINION SECURITIES INC	10,820,294
RBC DOMINION SECURITIES INC	10,667,236
Share Total	(153,058)
RAYMOND JAMES LTD.	6,996,530
RAYMOND JAMES LIMITED	6,877,450
Share Total	(119,080)
BMO NESBITT BURNS INC.	4,615,388
BMO NESBITT BURNS INC.	4,536,888
Share Total	(78,500)
CIBC WORLD MARKETS INC.	8,858,265
CIBC WORLD MARKETS INC.	8,790,298
Share Total	(67,967)

Total US imbalances	(1,842,457)
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Total CA Imbalances	(3,794,748)
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Unpaired Canadian Broadridge**	
FIRM	SHARES
INVESTORS GROUP SECURITIES INC	23346
MD MANAGEMENT LIMITED	13000

Unpaired Depository CDS*	
FIRM	SHARES
DEPOSITORY TRUST COMPANY	19591810
INTERACTIVE BROKERS CANADA INC	8756346
MERRILL LYNCH CDA INC	31500

Unpaired US Broadridge**	
FIRM	SHARES
JP MORGAN CHASE	605000
EUROCLEAR UK & IRELAND	240280
Morgan Stanley & Co. Inc.	117500
PERSHING SECURITIES LIMITED	93415
SAXO	22650

Unpaired Depository DTC*	
FIRM	SHARES
* FIDELITY**	3004818
* National Bank Financial	379876
TD Waterhouse Canada Inc. /CDS	283506
CREST International Nominees Limited	240280
* RBC Dominion Securities Inc./CDS	167785
* Raymond James Ltd./CDS	119080
* BMO Nesbitt Burns Inc./CDS	78500
Interactive Brokers L.L.C./Retail Clearance	66619
Haywood Securities Inc. /CDS	30000
* CIBC World Markets Inc. /CDS	10350

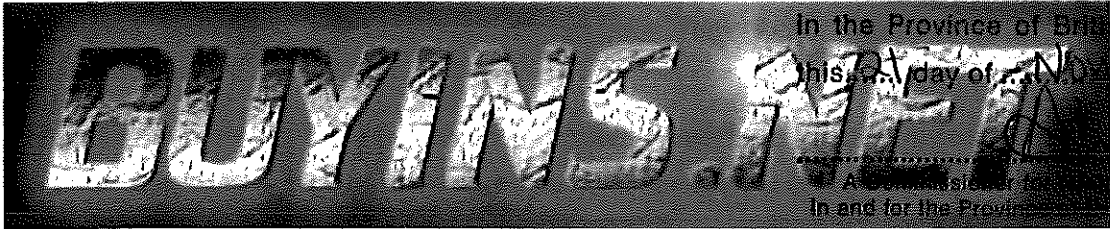
Notes:

· * DTCC/CDS positions without connection to a Broadridge report may be claimed by the broker to be available to cover any reported imbalance. That would only be correct if the broker advises and affirms in writing that the shares:

Are not for beneficial owners of their firm in another jurisdictions; have not been loaned out; are a true position of the firm's trading inventory to facilitate market making and contribute to market liquidity.

** Unpaired Broadridge values (having no depository shares to pair off) are viewed as actual imbalances and should be counted with total imbalances that are reported.

This is Exhibit " 5 " referred to in
the Affidavit of Murray Backhold
sworn to before me at Whistler
In the Province of British Columbia
this 21 day of November, 2024
Delton
A Commissioner for Taking Affidavits
In and for the Province of British Columbia



December 16, 2019

VIA Email:

VIA Fax:

VIA Physical Delivery:

RE: Ongoing Counterfeiting of CXR, CXRX, CXRXF, ADVZ Stock

Dear Compliance Officer / Legal:

For several years market makers in both Canada and the United States have been engaging in excessive counterfeiting (naked short selling) of CXR, CXRX, CXRXF, ADVZ stock. The data provided herein has been gathered from multiple US and Canadian exchanges, as well as, FINRA and the SEC. You are hereby provided notice to correct this situation prior to multiple regulatory, political and media actions being taken against your enterprise and its stakeholders, as well as you and all the other individuals responsible for this fraud.

Shareholders of ADVANZ PHARMA Corp. (ADVZ.TO, OTC: CXRXF) have engaged BUYINS.NET, a leading provider of Regulation SHO compliance monitoring, short sale trading statistics and market integrity surveillance. Regulation SHO, a US Federal Security Law governing short selling in the United States, requires bona-fide market-making activities to include making purchases and sales in roughly comparable amounts. According to the Fair Market Making Requirement of Regulation SHO, the Commission has stated that bona-fide market-making DOES NOT include activity that is related to speculative selling strategies for investment purposes of the broker-dealer and is disproportionate to the usual market-making patterns or practices of the broker-dealer in that security. Likewise, where a market maker posts continually at or near the best offer but does not also post at or near the best bid, the market maker's activities do not qualify as bona-fide market making. Moreover, a market maker that continually executes short sales away from its posted quotes is not considered to be engaged in bona-fide market making.

CXR, CXRX, CXRXF and ADVZ market makers have been monitored daily for compliance with Reg SHO and Fair Market-Making Requirements. Here is a trading analysis of the trading in all 4 stocks. BuyVol = real buyers at offer. SellVol = real sellers at bid. ShortVolume = short sale trade identifiers for both EXEMPT (market makers) and NON-EXEMPT (everyone else) shorts sales. **The short selling as a percentage of daily trading volume in CXR, CXRX, CXRXF, ADVZ by market makers in both Canada and the US is abnormally high, the**

market-making math related thereto does not reconcile and is not at all compliant with Federal Securities Laws.

We provide the following data in our reports:

DAILY TOTAL SHARES SHORTED (volume and price), which includes all shares shorted even by exempt institutions such as market makers.

FAILURES TO DELIVER (naked shorts).

MARKET MAKER SHARE VOLUME (exposing exactly how many shares are being traded and the name of the market-making firm traded through).

MARKET MAKER FRICTION FACTOR DATA (showing whether or not a fair market is being made in each trading day).

CUMULATIVE TOTAL SHARES SHORTED data showing large short positions and the volume weighted average price that a short squeeze will start.

CXRX US Daily Short Volume June 29, 2015 to December 30, 2016

Date	ShortVolume	TotalVolume	Percent	SqueezeTrigger	\$Value
12/30/2016	194,534	530,337	36.68%	\$2.13	\$413,968
12/29/2016	309,895	662,741	46.76%	\$2.13	\$659,766
12/28/2016	325,101	659,260	49.31%	\$2.11	\$687,264
12/27/2016	375,929	770,058	48.82%	\$2.12	\$796,594
12/23/2016	353,862	702,529	50.37%	\$2.17	\$767,881
12/22/2016	377,147	726,474	51.91%	\$2.15	\$810,489
12/21/2016	215,382	549,126	39.22%	\$2.25	\$484,394
12/20/2016	278,558	659,856	42.21%	\$2.32	\$647,090
12/19/2016	1,167,689	2,551,507	45.76%	\$2.45	\$2,865,509
12/16/2016	560,341	2,545,033	22.02%	\$2.18	\$1,222,104
12/15/2016	200,998	515,905	38.96%	\$2.13	\$427,121
12/14/2016	500,351	988,658	50.61%	\$2.21	\$1,104,275
12/13/2016	149,600	324,434	46.11%	\$2.20	\$329,868
12/12/2016	210,162	591,824	35.51%	\$2.23	\$467,821
12/9/2016	503,576	812,937	61.95%	\$2.33	\$1,173,836
12/8/2016	1,022,914	1,555,335	65.77%	\$2.15	\$2,200,288
12/7/2016	439,697	755,937	58.17%	\$2.24	\$983,602
12/6/2016	401,657	714,723	56.20%	\$2.39	\$960,764
12/5/2016	250,262	530,560	47.17%	\$2.53	\$633,663
12/2/2016	135,031	461,466	29.26%	\$2.58	\$348,380
12/1/2016	329,132	700,614	46.98%	\$2.47	\$812,956

11/30/2016	378,626	673,063	56.25%	\$2.61	\$986,979
11/29/2016	330,690	616,618	53.63%	\$2.60	\$859,560
11/28/2016	396,133	731,255	54.17%	\$2.63	\$1,044,346
11/25/2016	412,605	1,066,409	38.69%	\$2.64	\$1,087,527
11/23/2016	874,266	1,599,698	54.65%	\$2.55	\$2,228,126
11/22/2016	1,094,204	1,994,049	54.87%	\$2.97	\$3,243,402
11/21/2016	532,488	1,247,899	42.67%	\$3.35	\$1,782,584
11/18/2016	821,498	1,639,000	50.12%	\$3.29	\$2,702,966
11/17/2016	886,878	1,554,911	57.04%	\$3.28	\$2,910,646
11/16/2016	1,196,702	2,132,214	56.12%	\$3.28	\$3,934,148
Total	164,795,322	302,085,907	54.55%	\$12.73	\$2,098,659,222

*Total includes data 6-29-15 to 12-30-16. Chart truncated for viewing.

CXR Canadian Daily Short Volume January 1, 2015 to December 30, 2016

Date	ShortVolume	TotalVolume	VWAP	\$Value
12/30/2016	391	712	\$858.39	\$335,744
12/29/2016	488	888	\$863.40	\$421,568
12/28/2016	615	1,119	\$861.14	\$529,414
12/23/2016	1,066	1,939	\$875.37	\$932,940
12/22/2016	788	1,434	\$872.20	\$687,164
12/21/2016	604	1,099	\$905.14	\$546,581
12/20/2016	1,235	2,247	\$933.85	\$1,153,174
12/19/2016	2,711	4,933	\$988.10	\$2,679,095
12/16/2016	1,144	2,082	\$886.47	\$1,014,553
12/15/2016	514	936	\$857.19	\$440,741
12/14/2016	839	1,526	\$868.55	\$728,523
12/13/2016	741	1,349	\$872.26	\$646,639
12/12/2016	859	1,563	\$875.84	\$752,160
12/9/2016	1,337	2,433	\$919.03	\$1,228,687
12/8/2016	1,552	2,823	\$850.43	\$1,319,444
12/7/2016	1,668	3,034	\$889.86	\$1,484,058
12/6/2016	729	1,326	\$954.06	\$695,063
12/5/2016	758	1,380	\$1,011.96	\$767,352
12/2/2016	836	1,520	\$1,026.68	\$857,793
12/1/2016	1,150	2,093	\$989.54	\$1,138,190
11/30/2016	1,462	2,661	\$1,040.51	\$1,521,597
11/29/2016	643	1,171	\$1,048.82	\$674,867
11/28/2016	991	1,803	\$1,062.38	\$1,052,490

11/25/2016	1,189	2,164	\$1,062.13	\$1,263,150
11/24/2016	1,375	2,501	\$1,067.62	\$1,467,594
11/23/2016	1,672	3,042	\$1,031.04	\$1,724,005
11/22/2016	2,217	4,033	\$1,196.48	\$2,652,261
11/21/2016	1,709	3,109	\$1,343.07	\$2,294,912
11/18/2016	1,211	2,203	\$1,333.44	\$1,614,585
11/17/2016	1,796	3,269	\$1,324.47	\$2,379,405
11/16/2016	2,198	4,000	\$1,318.97	\$2,899,624
Total	593,418	1,079,727	\$11,083.98	\$6,577,429,470

*Total includes data 1-2-15 to 12-30-16 and is 1 for 300 split adjusted.
ShortVolume inferred using US data.

The below data is used to calculate if a fair market is being made in the shares of CXR, CXRX, CXRXF, ADVZ. Friction Factor determines if there is normal or abnormal behavior in the price action of the stock when compared to the buying vs. selling trading statistics.

CXRX US Price Friction June 9, 2016 to December 30, 2016

Date	Change	BuyVol	SellVol	NetVol	Friction
12/30/2016	0.01	158,517	279,303	-120,786	Bullish Bias
12/29/2016	-0.02	230,388	283,438	-53,050	-26,525
12/28/2016	0.03	220,522	239,890	-19,368	Bullish Bias
12/27/2016	-0.05	277,728	375,729	-98,001	-19,600
12/23/2016	0.02	268,239	239,576	28,663	14,332
12/22/2016	-0.1	204,560	358,421	-153,861	-15,386
12/21/2016	-0.1	211,138	154,930	56,208	Bearish Bias
12/20/2016	0	249,379	274,781	-25,402	Bullish Bias
12/19/2016	0.21	939,602	881,635	57,967	2,760
12/16/2016	-0.01	999,528	1,082,908	-83,380	-83,380
12/15/2016	0.01	143,375	163,359	-19,984	Bullish Bias
12/14/2016	0	357,600	360,303	-2,703	Bullish Bias
12/13/2016	-0.02	129,219	98,375	30,844	Bearish Bias
12/12/2016	-0.14	218,032	207,848	10,184	Bearish Bias
12/9/2016	0.11	260,976	238,480	22,496	2,045
12/8/2016	-0.01	469,892	660,977	-191,085	-191,085
12/7/2016	-0.15	251,833	237,041	14,792	Bearish Bias
12/6/2016	-0.1	302,448	250,069	52,379	Bearish Bias
12/5/2016	-0.1	156,546	235,140	-78,594	-7,859
12/2/2016	0.1	179,545	172,217	7,328	733
12/1/2016	-0.08	255,942	228,255	27,687	Bearish Bias

11/30/2016	-0.06	181,503	235,771	-54,268	-9,045
11/29/2016	0.04	203,196	282,926	-79,730	Bullish Bias
11/28/2016	0.08	210,080	311,014	-100,934	Bullish Bias
11/25/2016	0.14	349,921	438,369	-88,448	Bullish Bias
11/23/2016	-0.31	636,302	501,491	134,811	Bearish Bias
11/22/2016	-0.4	566,785	686,839	-120,054	-3,001
11/21/2016	-0.01	301,477	405,054	-103,577	-103,577
11/18/2016	0.02	538,847	556,019	-17,172	Bullish Bias
11/17/2016	0.07	528,144	557,526	-29,382	Bullish Bias
11/16/2016	0.08	804,456	835,243	-30,787	Bullish Bias
11/15/2016	-0.37	1,114,774	1,132,779	-18,005	-487
11/14/2016	0.59	2,245,462	2,247,136	-1,674	Bullish Bias
11/11/2016	0.58	2,266,196	2,677,334	-411,138	Bullish Bias
11/10/2016	0.26	1,075,330	996,314	79,016	3,039
11/9/2016	0.16	1,196,769	957,026	239,743	14,984
11/8/2016	-0.22	1,565,888	1,622,841	-56,953	-2,589
				-	
11/7/2016	-1.16	5,786,403	6,974,686	1,188,283	-10,244
11/4/2016	-0.08	547,843	451,186	96,657	Bearish Bias
11/3/2016	-0.18	479,342	510,623	-31,281	-1,738
11/2/2016	0.08	854,356	980,400	-126,044	Bullish Bias
11/1/2016	-0.03	547,403	583,725	-36,322	-12,107
10/31/2016	-0.17	368,813	412,253	-43,440	-2,555
10/28/2016	-0.07	395,624	428,194	-32,570	-4,653
10/27/2016	-0.23	307,202	380,597	-73,395	-3,191
10/26/2016	0.04	374,571	288,526	86,045	21,511
10/25/2016	-0.37	735,048	941,279	-206,231	-5,574
10/24/2016	-0.25	977,127	816,746	160,381	Bearish Bias
10/21/2016	0.51	7,141,708	7,901,487	-759,779	Bullish Bias
10/20/2016	0.48	818,735	868,722	-49,987	Bullish Bias
10/19/2016	-0.1	298,189	292,014	6,175	Bearish Bias
10/18/2016	0.1	498,013	352,386	145,627	14,563
10/17/2016	-0.14	536,628	369,456	167,172	Bearish Bias
10/14/2016	-0.4	769,140	817,945	-48,805	-1,220
10/13/2016	-0.24	560,731	632,986	-72,255	-3,011
10/12/2016	0	213,202	293,182	-79,980	Bullish Bias
10/11/2016	-0.18	245,181	276,222	-31,041	-1,725
10/10/2016	-0.03	321,888	245,789	76,099	Bearish Bias
10/7/2016	-0.22	344,061	241,710	102,351	Bearish Bias
10/6/2016	0.13	467,112	419,676	47,436	3,649
10/5/2016	0	72,441	42,292	30,149	Bearish Bias

10/4/2016	-0.65	1,223,079	1,062,085	160,994	Bearish Bias
10/3/2016	0.69	1,580,420	1,595,740	-15,320	Bullish Bias
9/30/2016	0.16	478,142	459,385	18,757	1,172
9/29/2016	-0.17	463,041	394,529	68,512	Bearish Bias
9/28/2016	-0.09	299,571	345,695	-46,124	-5,125
9/27/2016	-0.13	549,688	528,728	20,960	Bearish Bias
9/26/2016	-0.35	603,219	512,148	91,071	Bearish Bias
9/23/2016	0.4	578,898	476,719	102,179	2,554
9/22/2016	0.43	620,027	544,446	75,581	1,758
9/21/2016	-0.63	774,651	803,069	-28,418	-451
9/20/2016	-0.07	311,688	364,310	-52,622	-7,517
9/19/2016	-0.29	455,599	472,327	-16,728	-577
9/16/2016	-1.15	1,912,104	2,007,901	-95,797	-833
9/15/2016	-0.32	448,648	559,159	-110,511	-3,453
9/14/2016	0.44	414,146	414,268	-122	Bullish Bias
9/13/2016	-0.65	589,576	567,537	22,039	Bearish Bias
9/12/2016	-0.01	316,529	190,113	126,416	Bearish Bias
9/9/2016	-0.42	435,177	463,551	-28,374	-676
9/8/2016	-0.14	236,125	186,143	49,982	Bearish Bias
9/7/2016	-0.12	295,327	264,714	30,613	Bearish Bias
9/6/2016	-0.2	284,934	220,896	64,038	Bearish Bias
9/2/2016	-0.25	263,382	261,609	1,773	Bearish Bias
9/1/2016	-0.28	178,492	231,064	-52,572	-1,878
8/31/2016	-0.25	154,469	129,312	25,157	Bearish Bias
8/30/2016	-0.03	207,773	200,746	7,027	Bearish Bias
8/29/2016	0.15	206,522	124,777	81,745	5,450
8/26/2016	-0.09	206,046	152,278	53,768	Bearish Bias
8/25/2016	0.06	510,607	402,410	108,197	18,033
8/24/2016	-0.04	527,436	560,770	-33,334	-8,334
8/23/2016	-0.12	361,231	302,406	58,825	Bearish Bias
8/22/2016	-0.13	217,139	216,273	866	Bearish Bias
8/19/2016	-0.34	161,184	207,575	-46,391	-1,364
8/18/2016	0.19	481,376	491,181	-9,805	Bullish Bias
8/17/2016	0.06	857,633	930,523	-72,890	Bullish Bias
8/16/2016	-0.08	484,856	507,414	-22,558	-2,820
8/15/2016	-0.82	2,166,297	2,017,263	149,034	Bearish Bias
8/12/2016	-6.36	3,627,819	3,569,146	58,673	Bearish Bias
8/11/2016	-0.75	322,717	311,237	11,480	Bearish Bias
8/10/2016	0.01	156,867	136,758	20,109	20,109
8/9/2016	0.5	174,274	186,069	-11,795	Bullish Bias
8/8/2016	0.14	138,954	110,259	28,695	2,050

8/5/2016	1.4	123,360	86,762	36,598	261
8/4/2016	0.22	123,582	136,402	-12,820	Bullish Bias
8/3/2016	0.6	98,580	131,866	-33,286	Bullish Bias
8/2/2016	-5.79	573,742	423,734	150,008	Bearish Bias
8/1/2016	-0.31	32,324	38,768	-6,444	-208
7/29/2016	-0.7	49,464	50,415	-951	-14
7/28/2016	-0.06	18,144	21,208	-3,064	-511
7/27/2016	-0.16	54,684	48,400	6,284	Bearish Bias
7/26/2016	0.57	96,999	75,394	21,605	379
7/25/2016	-1.67	120,524	105,357	15,167	Bearish Bias
7/22/2016	-1	71,124	68,928	2,196	Bearish Bias
7/21/2016	-0.46	24,094	23,178	916	Bearish Bias
7/20/2016	0.43	54,328	36,588	17,740	413
7/19/2016	-0.32	31,461	24,366	7,095	Bearish Bias
7/18/2016	0.16	36,138	21,486	14,652	916
7/15/2016	-0.24	22,457	24,380	-1,923	-80
7/14/2016	0.39	26,300	34,021	-7,721	Bullish Bias
7/13/2016	-0.28	24,406	42,775	-18,369	-656
7/12/2016	0.03	51,132	45,125	6,007	2,002
7/11/2016	-0.14	40,648	34,246	6,402	Bearish Bias
7/8/2016	-0.13	48,032	49,093	-1,061	-82
7/7/2016	0.97	65,181	61,950	3,231	33
7/6/2016	-1	59,396	58,287	1,109	Bearish Bias
7/5/2016	-0.79	30,010	104,407	-74,397	-942
7/1/2016	0.31	58,836	32,140	26,696	861
6/30/2016	0.9	44,924	64,412	-19,488	Bullish Bias
6/29/2016	0.41	85,333	59,970	25,363	619
6/28/2016	0.5	36,300	86,900	-50,600	Bullish Bias
6/27/2016	-1.42	114,132	166,965	-52,833	-372
6/24/2016	-2.64	132,123	237,919	-105,796	-401
6/23/2016	0.49	63,863	56,135	7,728	158
6/22/2016	0.4	71,748	99,504	-27,756	Bullish Bias
6/21/2016	0.12	79,988	103,860	-23,872	Bullish Bias
6/20/2016	0.74	130,258	137,722	-7,464	Bullish Bias
6/17/2016	-0.29	71,015	96,725	-25,710	-887
6/16/2016	-0.47	132,074	144,348	-12,274	-261
6/15/2016	0.11	103,190	100,230	2,960	269
6/14/2016	-0.23	101,809	88,272	13,537	Bearish Bias
6/13/2016	-0.69	104,219	184,388	-80,169	-1,162
6/10/2016	-0.67	115,678	118,764	-3,086	-46
6/9/2016	0.13	54,498	85,940	-31,442	Bullish Bias

Date	Change	BuyVol	SellVol	NetVol	Friction	ShortVolume	TotalVolume	Percent	SqueezeTrigger	\$Value	BuyVol	ShortVol	SellVol	ShortVol	NetNet (BuyVol-(SellVol+ShortVolume))
12/30/2016	\$9.01	158,517	279,303	-120,786	Bullish Bias	194,514	530,337	36.65%	\$2.13	\$11,135	36,017	173,337			315,320
12/29/2016	-\$0.02	230,385	281,438	-51,053	Bullish Bias	169,895	662,741	16.76%	\$2.13	\$660,076	9,507	593,333			262,915
12/28/2016	\$0.01	220,522	219,590	936	Bullish Bias	125,101	659,260	19.11%	\$2.11	\$685,964	104,479	564,991			314,469
12/27/2016	-\$0.65	277,725	374,729	-96,999	Bullish Bias	375,929	770,855	45.32%	\$2.12	\$796,969	-98,261	751,658			473,919
12/23/2016	\$9.02	365,239	219,576	145,663	Bullish Bias	153,862	702,529	50.37%	\$2.17	\$767,881	-85,621	593,438			335,159
12/22/2016	\$0.10	204,369	358,421	-154,051	Bullish Bias	177,417	726,471	51.91%	\$2.15	\$510,866	172,437	735,568			531,665
12/21/2016	\$0.10	211,138	154,930	56,208	Bullish Bias	215,382	519,126	39.22%	\$2.25	\$184,610	1,214	370,312			159,174
12/20/2016	\$9.09	249,179	274,781	-25,602	Bullish Bias	278,558	659,856	42.21%	\$2.32	\$646,255	-29,179	553,319			304,960
12/19/2016	\$0.21	939,692	881,645	57,997	Bullish Bias	1,167,659	2,551,497	45.76%	\$2.45	\$2,560,538	228,657	2,049,321			1,169,722
12/16/2016	-\$0.01	999,528	1,052,905	-53,377	Bullish Bias	569,341	2,545,033	22.02%	\$2.18	\$1,221,410	439,157	1,643,249			641,721
12/15/2016	\$9.01	143,375	163,359	-19,984	Bullish Bias	269,938	515,905	35.96%	\$2.13	\$438,126	-57,621	364,357			326,982
12/14/2016	\$9.09	357,699	360,391	-2,692	Bullish Bias	580,151	958,658	50.61%	\$2.21	\$1,195,776	-142,751	860,654			593,051
12/13/2016	\$9.02	129,219	98,374	30,844	Bullish Bias	149,690	324,434	46.11%	\$2.20	\$329,120	20,381	247,975			118,776
12/12/2016	-\$0.14	218,032	297,848	-79,816	Bullish Bias	210,162	591,824	35.51%	\$2.23	\$468,661	7,870	418,010			199,978
12/9/2016	\$0.11	269,976	238,459	31,517	Bullish Bias	503,576	812,947	61.95%	\$2.33	\$1,173,332	212,699	742,056			481,050
12/8/2016	\$0.01	469,892	669,977	-191,085	Bullish Bias	1,022,911	1,855,185	65.75%	\$2.14	\$2,199,265	553,022	1,651,591			1,211,599
12/7/2016	-\$0.15	251,833	237,041	14,792	Bullish Bias	439,697	755,937	58.17%	\$2.24	\$984,921	-187,464	676,738			424,965
12/6/2016	-\$0.10	392,448	259,669	132,779	Bullish Bias	491,657	714,723	56.20%	\$2.39	\$959,900	-99,269	651,326			349,258
12/5/2016	\$0.10	156,316	235,140	-78,824	Bullish Bias	259,262	530,560	47.17%	\$2.53	\$613,163	91,716	485,492			328,846
12/2/2016	\$0.10	179,545	172,217	7,328	Bullish Bias	135,031	461,466	29.26%	\$2.58	\$345,380	44,514	397,248			127,703
12/1/2016	\$9.08	255,942	225,255	30,687	Bullish Bias	329,132	709,614	46.95%	\$2.47	\$812,956	-71,190	557,387			301,415
11/30/2016	\$9.06	351,593	235,771	115,822	Bullish Bias	378,626	671,063	56.25%	\$2.61	\$958,214	197,423	644,197			432,594
11/29/2016	\$0.61	294,196	352,926	-58,730	Bullish Bias	319,690	616,615	53.63%	\$2.60	\$859,794	127,494	613,616			410,420
11/28/2016	\$9.08	210,980	311,014	-100,034	Bullish Bias	396,133	731,255	54.17%	\$2.63	\$1,041,830	-156,053	767,117			497,067
11/25/2016	\$0.11	419,921	438,369	-18,448	Bullish Bias	412,695	1,066,499	35.69%	\$2.64	\$1,089,277	62,651	859,974			501,053
11/24/2016	\$0.31	646,392	501,491	144,901	Bullish Bias	574,266	1,599,698	54.65%	\$2.85	\$2,229,378	217,964	1,375,757			739,415
11/22/2016	-\$0.40	566,785	686,839	-120,054	Bullish Bias	1,094,204	1,994,049	54.87%	\$2.97	\$3,249,716	-527,419	1,781,043			1,214,258
11/21/2016	-\$0.01	491,477	465,664	25,813	Bullish Bias	403,577	1,217,499	42.67%	\$3.35	\$1,783,835	231,011	917,542			616,665
11/18/2016	\$9.02	335,847	556,019	-220,172	Bullish Bias	821,498	1,639,000	50.12%	\$3.29	\$2,702,728	382,651	1,377,417			838,670
11/17/2016	\$9.07	525,144	557,526	-32,382	Bullish Bias	856,578	1,554,911	55.04%	\$3.28	\$2,968,960	-358,734	1,444,494			916,260
11/16/2016	\$9.08	890,156	835,243	54,913	Bullish Bias	1,196,702	2,112,214	56.12%	\$3.28	\$1,925,181	192,216	2,011,945			1,227,189
11/14/2016	\$0.37	1,114,774	1,112,779	1,995	Bullish Bias	1,991,874	3,455,245	57.65%	\$3.18	\$6,314,159	577,109	3,121,693			2,669,579
11/11/2016	\$9.59	2,235,462	2,247,136	-11,674	Bullish Bias	1,271,691	6,269,187	52.65%	\$3.25	\$19,631,046	1,025,629	5,518,227			3,272,765
11/11/2016	\$9.58	2,266,196	2,267,314	-1,118	Bullish Bias	1,957,651	7,020,195	56.35%	\$2.79	\$11,041,746	1,691,455	6,644,955			1,165,789
11/10/2016	\$9.26	1,675,330	936,314	739,016	Bullish Bias	1,111,172	2,589,699	38.31%	\$2.19	\$2,417,517	37,842	2,169,186			1,914,156

ANALYSIS and ACTION

We have analyzed all of the US daily short volume data and correlated it to recent market making activity in CXRX. In a sample of 35 of the 35 trading days (11-10-16 to 12-30-16), 100% of the time, the combined selling and short selling in CXRX far exceeded the amount of buying (See NetNet column above). Market makers, by definition, are required to PROVIDE LIQUIDITY not extract or remove liquidity. The math provided above demonstrates that instead of matching orders, market makers are heavily shorting CXRX stock BOTH on the offer and on the bid, which by definition means they have a “speculative short selling strategy” running on CXRX. Market makers are carrying net short positions overnight and continuing to claim the market maker’s exemption, which is in VIOLATION of the Fair Market-Making Requirements of Regulation SHO. We are able to mathematically prove this because there is not enough BuyVol (buy volume) to match the amount of selling and short selling. The charts below identify the top 6 market makers in the US for CXRX. In 2019 Virtu Americas (NITE) accounted for 64.45% of total trading volume. This signifies that approximately 64.45% of all short selling either originated by or routed through NITE. In Canada for 2016, 30.37% of all trading volume was “Anonymous” while CIBC World Markets accounted for 13.94%, TD Securities 12.31%, RBC Capital Markets 12.13%, etc. Once again, the same averages may be applied to TOTAL SHARES SHORTED in the time frame to determine which market makers were complicit in the abusive, manipulative or illegal activity.

US Market Makers 2019

Symbol	Issue Name	Market	Tot. Volume (Last Month)	Tot. Volume (2 Months Ago)	Tot. Volume (YTD)	MPID	Market Participant Name	Rank	% Of Total Volume
CXRXF	Advanz Pharma	All OTC	3,899	5,504	143,094	NITE	VIRTU AMERICAS LLC	1	64.45
CXRXF	Advanz Pharma	All OTC	3,899	5,504	143,094	ETRF	GL EXECUTION SERVICES, LLC	2	18.7
CXRXF	Advanz Pharma	All OTC	3,899	5,504	143,094	INTL	INTLFCSTONE FINANCIAL INC.	3	8
CXRXF	Advanz Pharma	All OTC	3,899	5,504	143,094	OTCX	OTC LINK ECN ATS	4	5.54
CXRXF	Advanz Pharma	Other OTC	3,899	5,504	143,094	CSTI	CANACCORD GENUITY LLC	5	2.28
CXRXF	Advanz Pharma	Other OTC	3,899	5,504	143,094	COEL	CITADEL SECURITIES LLC	6	1.03

Canadian Market Makers 2016

Name	Buy Volume	Sell Volume	Total	Percent
Anonymous	61,282,799	68,087,543	129,370,342	30.37%
CIBC World Markets	30,051,539	29,335,520	59,387,059	13.94%
TD Securities	28,558,911	23,888,006	52,446,917	12.31%
RBC Capital Markets	26,560,538	25,118,404	51,678,942	12.13%
Instinet Canada	10,372,418	9,881,346	20,253,764	4.75%
Scotia Capital	9,525,640	9,838,905	19,364,545	4.55%
BMO Nesbitt Burns	8,314,743	7,305,534	15,620,277	3.67%
Merrill Lynch Canada	7,054,130	7,265,983	14,320,113	3.36%
Morgan Stanley Canada	5,721,506	6,456,714	12,178,220	2.86%
JitneyTrade	5,144,674	5,117,862	10,262,536	2.41%
GMP Securities	5,007,666	3,922,997	8,930,663	2.10%
National Bank Financial	4,856,617		4,856,617	1.14%
ITG Canada	4,421,188	4,621,920	9,043,108	2.12%
Goldman Sachs Canada	3,341,318	4,297,210	7,638,528	1.79%
Credit Suisse Securities	3,145,592	3,913,397	7,058,989	1.66%
Canacord Genuity		3,544,566	3,544,566	0.83%
TOTAL	213,359,279	212,595,907	425,955,186	100.00%

Highlighting each firm's abusive activities allows regulators, the SEC, FINRA, the U.S. Attorney and the media to easily identify the manipulative trading activity and counterfeiting of CXR, CXRX, CXRXF, ADVZ shares engaged in by market makers in-concert with the other major trading firms for the past year and well beyond. When overlaid for 2015 and 2016 the math is shocking. In the US **\$2,098,659,222 worth of total short selling took place**, representing in excess of 54.55% of CXRX's total trading volume! Each firm and its Principals have knowingly participated in manipulative trading practices and counterfeiting of CXRX shares. In Canada for 2015 and 2016 we infer the total Canadian dollar value of the short selling to be **\$6,577,429,470** (using 54.55% average from the US data).

We hereby demand that all counterfeit shares in CXR, CXRX, CXRXF, ADVZ be covered with legitimate buy-ins or Advanz Pharma will lobby its numerous contacts for "blue sheet requests" of all market makers identified in the FINRA Monthly Share Volume report highlighted above and its Canadian equivalent. Be advised that the shareholders intend to pursue all firms and all such violators of Regulation SHO and the Fair Market-Making Requirement aggressively and to the fullest extent of the law unless remedied as stated herein.

Sincerely,
Thomas C. Ronk, CEO, RIA, CTA
BUYINS.NET
Newport Beach, CA 92625
949-230-7680
tom@buyins.net



Murray Bockhold <murray.bockhold@gmail.com>

Version 2.0

Murray Bockhold <murray.bockhold@gmail.com>

Thu, Nov 21, 2024 at 9:21 AM

To: "Howcroft, Michael" <michael.howcroft@blakes.com>, John Fabello <jfabello@torys.com>, Jameel Madhany <jmadhany@cwllp.ca>

Cc: "Zindoga, Thelma" <thelma.zindoga@blakes.com>, bryson.stokes@blakes.com, "Robert L. Colson" <RColson@teplitskycolson.com>, Malcolm Woodside <MWoodside@cwllp.ca>, Laurie Ormston <LOrmston@cwllp.ca>

All,


I realized a few additions were required before sending to a larger audience.

Best,

Murray

2 attachments

 **Torys - John Fabello 11/21/2024.pdf**
298K

 **Case History and Summary of Evidence - 11/21/2024.docx.pdf**
249K

This is Exhibit " 6 " referred to in the Affidavit of... Murray Bockhold sworn to before me at Whistler in the Province of British Columbia this... 21... day of November, 2024

A. Welton
.....Thu, Nov 21, 2024 at 9:21 AM....
A Commissioner in and for the Province of British Columbia



Version 2.0

Murray Bockhold <murray.bockhold@gmail.com>

To: "Howcroft, Michael" <michael.howcroft@blakes.com>, John Fabello <jfabello@torys.com>, James Madhany <jmadhany@cwllp.ca>

Cc: "Zindoga, Thelma" <thelma.zindoga@blakes.com>, bryson.stokes@blakes.com, "Robert L. Colson" <RColson@teplitskycolson.com>, Malcolm Woodside <MWoodside@cwllp.ca>, Laurie Ormston <LOrmston@cwllp.ca>

All,

I realized a few additions were required before sending to a larger audience.

Best,

Murray

2 attachments

Torys - John Fabello 11/21/2024.pdf
298K

Case History and Summary of Evidence - 11/21/2024.docx.pdf
249K

This is Exhibit "7" referred to in the Affidavit of Murray Bockhold



Murray Bockhold <murray.bockhold@gmail.com> sworn to before me at Whistler

In the Province of British Columbia

this 21 day of November, 2024

Notice of Service - BC Supreme Court No. S-241997 CIBC Wood Gundy v. Murray Bockhold

Murray Bockhold <murray.bockhold@gmail.com>

A Commissioner for taking Affidavits in and for the Province of British Columbia this 21 day of November 2024 at 4:30 PM

To: "Cc: Prime Minister the Right Honourable Justin Trudeau" <justin.trudeau.p9@parl.gc.ca>, "Chrystia.Freeland.P9@parl.gc.ca" <chrystia.freeland.p9@parl.gc.ca>, Anna Kaminska <anna.kaminska@usdoj.gov>, "tracee.plowell@cfpb.gov" <tracee.plowell@cfpb.gov>, Karla Kincade <karla.kincade@rcmp-grc.gc.ca>, David Eby <premier@gov.bc.ca>, "pbrady@bcsc.bc.ca" <pbrady@bcsc.bc.ca>, Warren Funt <warrenfunt@gmail.com>, Jim Kershaw <fishiwish@gmail.com>, kgustafson@osc.gov.on.ca, ag.minister@gov.bc.ca, "information@ofsi-bsif.gc.ca" <information@ofsi-bsif.gc.ca>, Elsa Renzella <erenzella@ciro.ca>, "stan.magidson@asc.ca" <stan.magidson@asc.ca>, "sasha.cekerevac@acs.ca" <sasha.cekerevac@acs.ca>, Kevin Brennan <kevin.b.brennan@parthenon.ey.com>, "Dent, Peter" <pdent@deloitte.ca>, Carlo De Mello <cbdemello@kpmg.ca>, "Chiang, Carol" <cchiang@kpmg.ca>, Kate Furber <kate.furber@pwc.com>, "Mr. John Hannaford" <info@pco-bcp.gc.ca>, "Jason Boyer (CA)" <jason.boyer@pwc.com>, "Sackville, Patrick (OPO)" <patrick.sackville@ontario.ca>, The Honourable Arif Virani <mcu@justice.gc.ca>, "Cc: Theodora Lam" <tlam@ciro.ca>, Dan McVicker <dmcvicker@ciro.ca>, Lauren Shneer <ishneer@osc.gov.on.ca>, "bsimard@osc.gov.on.ca" <bsimard@osc.gov.on.ca>, "Dhaliwal, Kiran (Weiler, Patrick - MP)" <kiran.dhaliwal.842@parl.gc.ca>, "Sturdy.MLA, Jordan" <jordan.sturdy.MLA@leg.bc.ca>, katrine.conroy.mla@leg.bc.ca, nicki.sharma.mla@leg.bc.ca, Telford <pm@pm.gc.ca>, The Honourable Dominic LeBlanc <dominic.leblanc@parl.gc.ca>, Shalen Curtis-Micallef <shalen.curtis-micallef@justice.ca>, Keith Roy <homes@keithroy.com>, Chris Forbes <chris.forbes@fin.gc.ca>, MIKE HARCOURT <mharcourt@shaw.ca>, Alan Hibben <alan.hibben@icloud.com>, Douglas Steiner <doug.steiner@gmail.com>, Satish Tarachandra <satish.tarachandra@rcmp-grc.gc.ca>, Sandy Riley <Sandy.Riley@rbmcapital.ca>, Carolyn Hursh <carolyn.hursh@jrsl.ca>, John Fabello <jfabello@torys.com>, "Howcroft, Michael" <michael.howcroft@blakes.com>, Jameel Madhany <jmadhany@cwllp.ca>, "Robert L. Colson" <RColson@teplitskycolson.com>, Malcolm Woodside <MWoodside@cwllp.ca>, "anthony.jon.a@gmail.com" <anthony.jon.a@gmail.com>, Laurie Ormston <LOrmston@cwllp.ca>, "Zindoga, Thelma" <thelma.zindoga@blakes.com>, bryson.stokes@blakes.com, Ken Derakhshan <ken.derakhshan@rcmp-grc.gc.ca>, "Beckett, Shawn (OPO)" <shawn.beckett@ontario.ca>, "Wallace, Adam (OPO)" <adam.wallace@ontario.ca>, "Stephen Crawford, MPP" <stephen.crawfordco@pc.ola.org>, "Pond, Andrea (OPO)" <andrea.pond@ontario.ca>, Christina Lovato <trusteelovato@att.net>, Greg Wilson <gfw@gfwilsonlaw.com>, jbauman@hamiltonlane.com, mgiannini@hamiltonlane.com, relkhalib@apcap.com, Jonah Mann <JMann@stikeman.com>, jchas@apcap.com, Kish Kapoor <k Kapoor@rfcapgroup.com>, "Tara R. Hagan" <trhagan@nevadatreasurer.gov>, dstende@eidebailly.com, "Au, Aaron" <Aaron.Au@hawaii.gov>, media@rwjf.org, "Michelle Millhollon (TRSL)" <webmstr@trsl.org>, Imcknight@hwc-cpa.com, bthames@hwc-cpa.com, Carl Defilippi <cdefilippi@kcareno.com>, PTardif@blg.com, John Murtha <JMurtha@woodburnandwedge.com>, "Seth J. Adams" <SAdams@woodburnandwedge.com>, jmurphy@blg.com, Gordon Smith <gsmith@bcsc.bc.ca>, Sammy Wu <swu@bcsc.bc.ca>, Michael Duheme <michael.duheme@rcmp-grc.gc.ca>, Vance Morgan <Vance.Morgan@rcmp-grc.gc.ca>, Faiz Ahmed <Faiz.Ahmed@rcmp-grc.gc.ca>, "Frazer, Steven" <steven.frazer@rcmp-grc.gc.ca>, Andrew Kriegler <akriegler@iiloc.ca>, Mark Pallas <Pallas@iiloc.ca>, Jeff Hartman <jlh@bankruptcyreno.com> Cc: Bob Levine <bob.levine@avisonyoung.com>, Katherine Karbownik <k.karbownik@rogers.com>, Lorne Pringle <lorne_tianne@hotmail.com>, David Bockhold & Susan Wilds <daveb@kobelt.com>, David Lloyd <david.n.lloyd.79@gmail.com>, Frank and Dianne Wilson <Frankfdw111@gmail.com>, Mac Balkam <mac@eskaymining.com>, ArthurP.West@cibc.com, "Alghabi, Human" <Human.Alghabi@cibc.com>, Drew Hoyle <hoyled@shaw.ca>, Dean Knoblauch <dean.knoblauch@gmail.com>, Jim Blatchford <jblatchford@telus.net>, Romolo DiFonzo <rdifonzo@me.com>, Peter Snucins <psnucins@aol.com>, Ross MacDonald <Duganmac@gmail.com>, Laesha Smith <lsmith@peslitigation.com>, Dan Russell <drussellwv@gmail.com>, John Landry <john.landry@dlapiper.com>, "Bell, Derek" <derek.bell@dlapiper.com>, "Saleski, Courtney" <Courtney.Saleski@us.dlapiper.com>, John Chisholm <jdc1927@gmail.com>

All,

Please be advised this email memorializes a Notice of Service served to you in advance of a hearing in BC Supreme Court tomorrow, November 22, 2024 at 10am.

I enclose herewith a copy of my 2nd affidavit and exhibits in these proceedings which will be filed with the court at 9am tomorrow. I live in Whistler BC and there is no ability to file here. Please note, Exhibit "7" will be a copy of this email evidencing who has received it.

If your name is in the header, it implies you have received previous correspondence and you are fully aware of your role in this unresolved, and very important matter. It also implies that, to date, you have either 1) fulfilled your fiduciary duty to the best of your ability and been overruled or intimidated or, ii) demonstrated an unwillingness to perform your fiduciary duty and acted in bad faith. I encourage you to begin this update by reading the letter to John Fabello at Torys.

If you wish to support BIM, the BIM committee, Harrington Global, Save Canadian Mining, Power Nickel, Quantum Biopharma, Premium Nickel and all the victims of naked short selling and alleged illegal market manipulation, kindly reply to this email and:

1. Acknowledge receipt of this correspondence in its entirety,
2. Provide a signed letter, preferably on letterhead, evidencing your support for Bockhold Investment Management and the Save Canadian Mining campaign that can be presented at tomorrow's hearing. In the alternative, please simply reply 'all' with evidence of your support, (Evidence with a signature is more meaningful to the court)
3. Volunteer to become part of the solution, not the problem.

As you will soon learn, this debacle has been going on longer, and is larger, than the criminal charges filed by the U.S. Department of Justice that TD Bank recently plead guilty too.

You should also be advised the people who act in bad faith by not replying will be reported to:

Ms. Anna Kaminska
Ms. Karla Kincaide
US Department of Justice

Canadian representative to the International Anti-Corruption
Chief of the Criminal Division,
Coordination Centre, National Crime Agency.

Email: anna.kaminska@usdoj.gov
London, England

Ms. Tracee Plowell-Page

Senior Litigation Counsel

Consumer Financial Protection Branch.

Email: tracee.plowell@cfpb.gov

Email: karla.kincade@rcmp-grc.gc.ca

I hope you enjoy reading the enclosures, although many of you won't. On behalf of BIM, the BIM Committee, Harrington Global, Save Canadian Mining and all of the victims of alleged market manipulation and malfeasance, we hope you share our integrity and desire to make meaningful changes to the structure of regulation and enforcement in Canada's capital markets.

With sincere thanks,

Murray Bockhold
Bockhold Investment Management


10 attachments


 **Addidavit of Murray Bockhold 11/21/2024.pdf**
74K


 **Torys - John Fabello 11/21/2024.pdf**
298K


 **Case History and Summary of Evidence - 11/21/2024.docx.pdf**
249K


 **Badger Daylighting Analysis - Canada.pdf**
2369K


 **PNPN Report - 7-15-2024.pdf**
1015K

 **PNPN Report - 7-31-2024.pdf**
1007K

 **PNPN Report - 8-15-2024.pdf**
973K

 **PNPN Report - 8-30-2024.pdf**
979K

 **CXR Letter 12-16-19 3.pdf**
2237K

 **Letter to Fabello, Howcroft and Madhany Version 2.0 dated 11:21:2024.pdf**
102K