

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

B E T W E E N :

MONICA MATTA and MARK AMELLO

Applicants

-and-

ALTMORE MORTGAGE INVESTMENT CORPORATION

Respondent

*APPLICATION UNDER SECTION 248(3) OF THE BUSINESS CORPORATIONS ACT
(ONTARIO) AND SECTION 101 OF THE COURTS OF JUSTICE ACT (ONTARIO)*

**SUPPLEMENT TO THE THIRD REPORT OF BDO CANADA LIMITED,
IN ITS CAPACITY AS RECEIVER**

APRIL 8, 2022

MILLER THOMSON LLP

40 King Street West
Suite 5800
Toronto Ontario
M5H 3S1, Canada

Gregory Azeff LSO#: 45324C

Tel: 416.595.2660 / Fax: 416.595.8695

Email: gazeff@millerthomson.com

Stephanie De Caria LSO#: 68055L

Tel: 416.597.2652 / Fax: 416.595.8695

Email: sdecaria@millerthomson.com

Lawyers for the Receiver and Trustee

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. PURPOSE OF SUPPLEMENTARY REPORT	2
A. Purpose of Supplementary Report.....	2
B. Orders Sought.....	2
III. TERMS OF REFERENCE	3
IV. CONTINUING NON-COMPLIANCE	3
A. Undisclosed Bank Accounts.....	3
B. Failure to Disclose Information or Documents	4
C. Incomplete OR Examination.....	4
V. CONCLUSION.....	5

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

B E T W E E N :

MONICA MATTA and MARK AMELLO

Applicants

-and-

ALTMORE MORTGAGE INVESTMENT CORPORATION

Respondent

*APPLICATION UNDER SECTION 248(3) OF THE BUSINESS CORPORATIONS ACT
(ONTARIO) AND SECTION 101 OF THE COURTS OF JUSTICE ACT (ONTARIO)*

**SUPPLEMENT TO THE THIRD REPORT OF BDO CANADA LIMITED,
IN ITS CAPACITY AS RECEIVER**

I. INTRODUCTION

1. Pursuant to the Order of the Honourable Madam Justice Conway of the Ontario Superior Court of Justice (Commercial List) (the “**Court**”) dated November 8, 2021 (the “**Receivership Order**”), BDO Canada Limited (“**BDO**”) was appointed as receiver (in such capacity, the “**Receiver**”) over Altmort Mortgage Investment Corporation (“**AMIC**”), Altmort Capital Inc., Independent Mortgage Advisors Inc. and Ian Ross McSevney (“**McSevney**”) pursuant to section 248(1) of the *Business Corporations Act*, R.S.O. 1990, c. B.16, as amended and section 101 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended.

2. This Report (the “**Supplementary Report**”) is supplementary to, and should be read in conjunction with, the Third Report of the Receiver dated January 26, 2022 (the “**Third Report**”).

II. PURPOSE OF SUPPLEMENTARY REPORT

A. Purpose of Supplementary Report

3. This Supplementary Report is filed to provide this Honourable Court with an update on Mr. McSevney’s ongoing lack of compliance with the Receivership Order since the date of the Third Report. In particular, the Receiver advises as follows:

(a) Mr. McSevney failed to disclose the existence of two bank accounts with Equitable Bank; and

(b) Mr. McSevney has failed to provide any documents or information to the Receiver.

4. In addition to the above, the Official Receiver (the “**OR**”) has advised that Mr. McSevney has not completed his examinations.

B. Orders Sought

5. The Receiver files this Supplementary Report in support of its motion for, among other things, Orders:

(a) Declaring that McSevney is in contempt of the Receivership Order;

(b) Directing McSevney to pay the Receiver’s costs of this Motion on a full indemnity basis;

(c) If a finding of contempt is made, scheduling a hearing to determine the appropriate penalty; and

(d) Such further relief as this Court deems appropriate.

III. TERMS OF REFERENCE

6. In preparing this Supplementary Report and making the comments herein the Receiver has, where applicable, relied upon information prepared or provided by third-party sources (collectively, the “**Information**”). Certain of the information contained in this Supplementary Report may refer to, or is based on, the Information. As the Information has been provided by third parties or has been obtained from documents filed with the Court in this matter, the Receiver has relied on the Information and, to the extent possible, has reviewed the Information for reasonableness. However, the Receiver has neither audited nor otherwise attempted to verify the accuracy or completeness of the Information in a manner that would wholly or partially comply with Generally Accepted Assurance Standards pursuant to the Canadian Institute of Chartered Accountants Handbook and accordingly, the Receiver expresses no opinion or other form of assurance in respect of the Information.

7. Capitalized terms are as defined in the Third Report unless otherwise defined herein.

IV. CONTINUING NON-COMPLIANCE

A. Undisclosed Bank Accounts

8. Mr. McSevney has failed to disclose all of his bank accounts to the Receiver/Trustee, in breach of the Receivership Order and his duties as a bankrupt in accordance with the BIA.

9. Specifically, on January 10, 2022, BDO, in its capacity as Trustee of the McSevney bankruptcy estate, was advised by Tangerine Bank that mortgage payments in respect of an investment property co-owned by McSevney were being drawn from an account at Equitable Bank (“**EQB**”). A copy of a void cheque was provided to the Trustee and is attached hereto as **Appendix “A”**.

10. The Trustee immediately wrote to EQB requesting details and freezing of any and all accounts that McSevney has at EQB. The Trustee subsequently made a similar request of EQB in respect of the other corporate debtors in these proceedings and was advised that only McSevney had accounts at EQB.

11. EQB provided bank statements in respect of McSevney's two bank accounts to the Trustee. These statements indicate that McSevney began banking at EQB in September of 2021. Copies of each account statement are attached hereto as **Appendices "B" and "C"**, respectively.

B. Failure to Disclose Information or Documents

12. Since the date of the Third Report, Mr. McSevney has failed to disclose any information or documents to the Receiver.

13. On March 29, 2022, by letter from its counsel, the Receiver renewed its request that Mr. McSevney deliver copies of all documents, correspondence and other records related to Altmore, its business and its affiliates. Attached as **Appendix "D"** hereto is a copy of the email to McSevney dated March 29, 2022 from Receiver's counsel, Gregory Azeff of Miller Thomson LLP. The Receiver has not yet received any response from McSevney.

C. Incomplete OR Examination

14. In mid-January the OR of the Office of the Superintendent in Bankruptcy notified the Trustee that two examinations had been scheduled with McSevney in respect of his personal bankruptcy and the bankruptcy of AMIC:

- (a) January 27, 2022, 10:00 AM: Original scheduled date for examination of McSevney re: his bankruptcy; and

- (b) January 31, 2022, 10:00 AM: Original examination of McSevney as officer of AMIC.

15. The OR advised the Trustee that McSevney attended the first examination which lasted approximately 3 hours and was adjourned to be reconvened at 10:00 AM on Monday January 31, 2022. McSevney did attend the reconvened examination.

16. The original January 31st examination was then rescheduled to 10:00 AM on February 17, 2022. The OR advised that McSevney cancelled due to illness and indicated to the OR that he would contact him when he was feeling better to set a new date for the examination. The OR has advised the Trustee that McSevney has not arranged a new date.

V. CONCLUSION

17. The Receiver has prepared this Supplementary Report in support of the relief sought in its Notice of Motion returnable February 1, 2022, including in particular, an Order:

- (a) Declaring that McSevney is in contempt of the Receivership Order;
- (b) Directing McSevney to pay the Receiver's costs of this Motion on a full indemnity basis;
- (c) If a finding of contempt is made, scheduling a hearing to determine the appropriate penalty; and
- (d) Such further direction as the Court considers appropriate.

All of which is respectfully submitted at Toronto, Ontario this 8th day of April, 2022.

BDO Canada Limited
in its capacity as Court-Appointed Receiver of
Altmore Mortgage Investment Corporation and
Ian Ross McSevney and not in its personal or corporate capacity

A handwritten signature in black ink, appearing to read "Clark Lonergan". The signature is written in a cursive, flowing style.

Clark Lonergan, CPA, CA, CIRP, LIT
Senior Vice -President

APPENDIX A

Ian McSevney

DATE 1 2 0 9 2 0 2 1
D D M M Y Y Y Y

PAY TO THE
ORDER OF

VOID

/DO

Equitable Bank Tower
30 St. Clair Ave. W., Suite 700
Toronto, ON M4V 3A1

80002

TRANSIT NUMBER

623

INSTITUTION CODE

107240632

ACCOUNT NUMBER

APPENDIX B

Account Statement

Account : 107240632

Customer : 371937

Ian McSevney

Currency : CAD

Book Date	Reference	Description	Value Date	Debit	Credit	Closing Balance	Transaction Type
		Balance at Period Start				0.00	
10 SEP 21	FT21253F1XNV	Interac e-Transfer received Ian McSevney	10 SEP 21		1,881.00	1,881.00	Interac Credit
13 SEP 21	FT21256GK0JK	Interac e-Transfer received Ian McSevney	13 SEP 21		1,150.00	3,031.00	Interac Credit
14 SEP 21	FT21257NMQ5C	Interac e-Transfer received Ian McSevney	14 SEP 21		1,220.00	4,251.00	Interac Credit
14 SEP 21	FT21257YLZGF	Transfer from ian@mcsevney.com	14 SEP 21	50.00		4,201.00	TRANSFER BETWEEN EQ CUSTOMERS
14 SEP 21	FT21257QNKVH	Interac e-Transfer sent	14 SEP 21	10.00		4,191.00	Interac Debit
15 SEP 21	FT21258L0YHK	Auto-withdrawal by Tangerine	15 SEP 21	1,808.17		2,382.83	EFT Incoming
15 SEP 21	FT2125822YPQ	Interac e-Transfer sent	15 SEP 21	60.00		2,322.83	Interac Debit
15 SEP 21	FT21258XYZX2	Interac e-Transfer sent	15 SEP 21	65.00		2,257.83	Interac Debit
16 SEP 21	FT21259MJ4R8	Interac e-Transfer received Ian McSevney McSevney	16 SEP 21		1,220.00	3,477.83	Interac Credit
16 SEP 21	FT21259TZ18X	Transfer from ian@mcsevney.com	16 SEP 21	50.00		3,427.83	TRANSFER BETWEEN EQ CUSTOMERS
17 SEP 21	FT2126062CWV	Interac e-Transfer received Ian McSevney McSevney	17 SEP 21		1,200.00	4,627.83	Interac Credit
17 SEP 21	FT212605PWZY	Transfer from ian@mcsevney.com	17 SEP 21	50.00		4,577.83	TRANSFER BETWEEN EQ CUSTOMERS

18 SEP 21	FT2126140F6V	Interac e-Transfer sent	18 SEP 21	120.00	4,457.83	Interac Debit
19 SEP 21	FT21262NGHLW	Interac e-Transfer sent	19 SEP 21	20.00	4,437.83	Interac Debit
22 SEP 21	FT212654413Y	Interac e-Transfer received	22 SEP 21	1,500.00	5,937.83	Interac Credit
Ian McSevney McSevney						
22 SEP 21	FT212654Y2MB	Interac e-Transfer received	22 SEP 21	1,500.00	7,437.83	Interac Credit
Ian McSevney						
22 SEP 21	FT2126556CZ6	Interac e-Transfer sent	22 SEP 21	1,500.00	5,937.83	Interac Debit
23 SEP 21	FT2126681XJF	Auto-withdrawal by	23 SEP 21	5,424.51	513.32	EFT Incoming
Tangerine						
25 SEP 21	FT21268P672P	Transfer from	25 SEP 21	1,153.79	1,667.11	TRANSFER BETWEEN EQ CUSTOMERS
[REDACTED] to Ian@						
30 SEP 21	FT2127321XBF	Transfer from	30 SEP 21	50.00	1,617.11	TRANSFER BETWEEN EQ CUSTOMERS
ian@mcsevney.com to [REDACTED]						
30 SEP 21	AAACT21273L5F GNGX0	Interest	01 OCT 21	1.98	1,619.09	
received						
Capitalise Schedule						
01 OCT 21	FT21274T6XWV	Transfer from	01 OCT 21	50.00	1,569.09	TRANSFER BETWEEN EQ CUSTOMERS
ian@mcsevney.com to [REDACTED]						
01 OCT 21	FT2127487L3X	Interac e-Transfer sent	01 OCT 21	1,300.00	269.09	Interac Debit
02 OCT 21	FT212753YFZF	Interac e-Transfer received	02 OCT 21	2,000.00	2,269.09	Interac Credit
Ian McSevney						
03 OCT 21	FT21276RQF3B	Interac e-Transfer received	03 OCT 21	1,305.00	3,574.09	Interac Credit
Ian McSevney						
03 OCT 21	FT21276D5MBL	Transfer from	03 OCT 21	50.00	3,524.09	TRANSFER BETWEEN EQ CUSTOMERS
ian@mcsevney.com to [REDACTED]						

05 OCT 21	FT212786Z3XF	Interac e-Transfer sent	05 OCT 21	1,325.00	2,199.09	Interac Debit	
09 OCT 21	FT21282CNBZF	Transfer from	09 OCT 21	2,000.00	4,199.09	TRANSFER BETWEEN EQ CUSTOMERS	
		[REDACTED] to ian@					
10 OCT 21	FT21283JQ9PZ	Interac e-Transfer sent	10 OCT 21	60.00	4,139.09	Interac Debit	
14 OCT 21	FT212871PK8C	Interac e-Transfer sent	14 OCT 21	93.00	4,046.09	Interac Debit	
15 OCT 21	FT21288MW5BF	Transfer from	15 OCT 21	2,000.00	2,046.09	TRANSFER BETWEEN EQ ACCOUNTS	
		107240632 to 107368221					
18 OCT 21	FT21291XXZ58	Auto-withdrawal by	18 OCT 21	1,808.17	237.92	EFT Incoming	
		Tangerine					
19 OCT 21	FT21292Z7RSD	Interac e-Transfer sent	19 OCT 21	10.00	227.92	Interac Debit	
20 OCT 21	FT212932FVHW	Interac e-Transfer sent	20 OCT 21	80.00	147.92	Interac Debit	
20 OCT 21	FT21293FRMC5	Interac e-Transfer cancelled	20 OCT 21	80.00	227.92	InteracReversal	
		Garry Poree					
20 OCT 21	FT2129330J0W	Interac e-Transfer sent	20 OCT 21	80.00	147.92	Interac Debit	
21 OCT 21	FT212946NCRK	Interac e-Transfer cancelled	21 OCT 21	80.00	227.92	InteracReversal	
		Garry Poree					
21 OCT 21	FT21294XKNRX	Interac e-Transfer sent	21 OCT 21	80.00	147.92	Interac Debit	
31 OCT 21	AAACT21304K20QM4N0	Interest	01 NOV 21	1.77	149.69		
		received					
		Capitalise Schedule					
10 NOV 21	FT213141F7LH	Transfer from	10 NOV 21	1,000.00	1,149.69	TRANSFER BETWEEN EQ CUSTOMERS	
		[REDACTED] to ian@					
10 NOV 21	FT21314GN4SQ	Interac e-Transfer sent	10 NOV 21	1,000.00	149.69	Interac Debit	
13 NOV 21	FT21317YVQQ3	Interac e-Transfer sent	13 NOV 21	65.00	84.69	Interac Debit	
14 NOV 21	FT21318WMZNP	Transfer from	14 NOV 21	1,808.17	1,892.86	TRANSFER BETWEEN EQ CUSTOMERS	

██████████ to i
an@

15 NOV 21	FT21319Q7JLQ	Interac e-Transfer received	15 NOV 21	120.00	2,012.86	Interac Credit
Ian McSevney						
15 NOV 21	FT213194QC5K	Interac e-Transfer sent	15 NOV 21	60.00	1,952.86	Interac Debit
16 NOV 21	FT21320CJZCX	Auto-withdrawal by	16 NOV 21	1,808.17	144.69	EFT Incoming
Tangerine						
17 NOV 21	FT213217QVCW	Interac e-Transfer sent	17 NOV 21	100.00	44.69	Interac Debit
19 NOV 21	FT21323153LZ	Interac e-Transfer sent	19 NOV 21	40.00	4.69	Interac Debit
21 NOV 21	FT213257172F	Transfer from	21 NOV 21	500.00	504.69	TRANSFER BETWEEN EQ CUSTOMERS

██████████ to i
an@

22 NOV 21	FT21326ZFKF0	Interac e-Transfer sent	22 NOV 21	500.00	4.69	Interac Debit
30 NOV 21	FT2133416M30	Transfer from	30 NOV 21	300.00	304.69	TRANSFER BETWEEN EQ CUSTOMERS

██████████ to i
an@

30 NOV 21	FT21334RR4ZH	Transfer from	30 NOV 21	200.00	504.69	TRANSFER BETWEEN EQ ACCOUNTS
107368221 to 107240632						
30 NOV 21	FT21334QM4XZ	Interac e-Transfer sent	30 NOV 21	500.00	4.69	Interac Debit
30 NOV 21	AAACT2133436D TWLHW	Interest	01 DEC 21	0.22	4.91	

received

Capitalise Schedule

02 DEC 21	FT21336Q8FMW	Transfer from	02 DEC 21	1,000.00	1,004.91	TRANSFER BETWEEN EQ CUSTOMERS
-----------	--------------	---------------	-----------	----------	----------	-------------------------------

██████████ to i
an@

02 DEC 21	FT21336LG8K2	Interac e-Transfer sent	02 DEC 21	1,000.00	4.91	Interac Debit
09 DEC 21	FT21343C6PKL	Transfer from	09 DEC 21	100.00	104.91	TRANSFER BETWEEN EQ CUSTOMERS

██████████ to i
an@

09 DEC 21	FT21343YWRHF	Interac e-Transfer sent	09 DEC 21	100.00	4.91	Interac Debit
14 DEC 21	FT21348L56CH	Transfer from	14 DEC 21	1,000.00	1,004.91	TRANSFER BETWEEN EQ CUSTOMERS
[Redacted] to ian@						
14 DEC 21	FT21348RQ228	Interac e-Transfer sent	14 DEC 21	1,000.00	4.91	Interac Debit
15 DEC 21	FT21349L1V07	Transfer from	15 DEC 21	153.10	158.01	TRANSFER BETWEEN EQ CUSTOMERS
[Redacted] to ian@						
15 DEC 21	FT21349T3F0K	Transfer from	15 DEC 21	158.01	0.00	TRANSFER BETWEEN EQ ACCOUNTS
107240632 to 107368221						
22 DEC 21	FT21356TFJZ6	Transfer from	22 DEC 21	1,000.00	1,000.00	TRANSFER BETWEEN EQ CUSTOMERS
e.trading@mcseviney.com to ian@mcse						
22 DEC 21	FT21356MFL3L	Transfer from	22 DEC 21	1,153.00	2,153.00	TRANSFER BETWEEN EQ CUSTOMERS
[Redacted] to ian@						
22 DEC 21	FT21356CKX39	Interac e-Transfer sent	22 DEC 21	25.00	2,128.00	Interac Debit
23 DEC 21	FT21357R3DLW	Auto-withdrawal by	23 DEC 21	1,808.17	319.83	EFT Incoming
Tangerine						
23 DEC 21	FT21357931TT	Interac e-Transfer sent	23 DEC 21	100.00	219.83	Interac Debit
24 DEC 21	FT213585NZYP	Interac e-Transfer sent	24 DEC 21	150.00	69.83	Interac Debit
24 DEC 21	FT21358J5QS1	Interac e-Transfer sent	24 DEC 21	63.00	6.83	Interac Debit
30 DEC 21	FT21364JN7JJ	Transfer from	30 DEC 21	100.00	106.83	TRANSFER BETWEEN EQ CUSTOMERS
e.trading@mcseviney.com to ian@mcse						
30 DEC 21	FT213647ZGXG	Interac e-Transfer sent	30 DEC 21	100.00	6.83	Interac Debit
30 DEC 21	FT21364B65K8	Transfer from	30 DEC 21	19.32	26.15	TRANSFER BETWEEN EQ ACCOUNTS
107368221 to 107240632						

30 DEC 21	FT213646N6CZ	Interac e-Transfer sent	30 DEC 21	25.00	1.15	Interac Debit
31 DEC 21	FT21365ZFYG6	Transfer from	31 DEC 21	2,700.00	2,701.15	TRANSFER BETWEEN EQ CUSTOMERS
e.trading@mcseventy.com to ian@mcse						
31 DEC 21	FT21365X22X1	Interac e-Transfer sent	31 DEC 21	43.00	2,658.15	Interac Debit
31 DEC 21	AAACT21365556LB1GB	Interest	01 JAN 22	0.18	2,658.33	
received						
Capitalise Schedule						
01 JAN 22	FT220018W397	Interac e-Transfer sent	01 JAN 22	57.00	2,601.33	Interac Debit
01 JAN 22	FT220019HT43	Interac e-Transfer sent	01 JAN 22	508.50	2,092.83	Interac Debit
02 JAN 22	FT22002RKPSQ	Interac e-Transfer sent	02 JAN 22	92.83	2,000.00	Interac Debit
03 JAN 22	FT22003D3CMY	Auto-withdrawal by	03 JAN 22	1,700.00	300.00	EFT Incoming
Tangerine						
04 JAN 22	FT22004Z1728	Interac e-Transfer sent	04 JAN 22	60.00	240.00	Interac Debit
05 JAN 22	FT220058QRW9	Interac e-Transfer sent	05 JAN 22	167.00	73.00	Interac Debit
05 JAN 22	FT22005ZKJ7G	Interac e-Transfer sent	05 JAN 22	60.00	13.00	Interac Debit
28 JAN 22	FT22028X7F4T	Transfer from	28 JAN 22	1,000.00	1,013.00	TRANSFER BETWEEN EQ CUSTOMERS
[REDACTED] to ian@						
28 JAN 22	FT2202869428	Interac e-Transfer sent	28 JAN 22	1,000.00	13.00	Interac Debit
31 JAN 22	AAACT220319VM8J7PV	Interest	01 FEB 22	0.17	13.17	
received						
Capitalise Schedule						
28 FEB 22	AAACT22059GCH20H12	Interest	01 MAR 22	0.01	13.18	
received						
Capitalise Schedule						
01 MAR 22	FT22060ZLS5R	Transfer from	01 MAR 22	570.00	583.18	TRANSFER BETWEEN EQ CUSTOMERS
e.trading@mcseventy.com to ian@mcse						

01 MAR 22	FT220604DRXF	Transfer from	01 MAR 22	580.00	3.18	TRANSFER BETWEEN EQ ACCOUNTS
		107240632 to 107368221				
02 MAR 22	FT220610XGYZ	Transfer from	02 MAR 22	500.00	503.18	TRANSFER BETWEEN EQ CUSTOMERS
		e.trading@mcseventy.com to ian@mcse				
02 MAR 22	FT220613WF1M	Interac e-Transfer sent	02 MAR 22	500.00	3.18	Interac Debit
	Balance at Period End				3.18	

APPENDIX C

Account Statement

Account : 107368221

Customer : 371937

Ian McSevney

Currency : CAD

Book Date	Reference	Description	Value Date	Debit	Credit	Closing Balance	Transaction Type
		Balance at Period Start				0.00	
15 OCT 21	FT21288MW5BF	Transfer from	15 OCT 21		2,000.00	2,000.00	TRANSFER BETWEEN EQ ACCO UNTS
		107240632 to 107368221					
15 OCT 21	FT21288203CK	Interac e-Transfer sent	15 OCT 21	500.00		1,500.00	Interac Debit
31 OCT 21	AAACT21304K20 QHBMV	Interest	01 NOV 21		0.87	1,500.87	
		received					
		Capitalise Schedule					
01 NOV 21	FT21305S4ZYR	Interac e-Transfer sent	01 NOV 21	565.00		935.87	Interac Debit
06 NOV 21	FT21310L94M7	Interac e-Transfer sent	06 NOV 21	500.00		435.87	Interac Debit
14 NOV 21	FT2131852Y03	Interac e-Transfer sent	14 NOV 21	100.00		335.87	Interac Debit
20 NOV 21	FT21324JYSW0	Interac e-Transfer sent	20 NOV 21	70.00		265.87	Interac Debit
30 NOV 21	FT21334RR4ZH	Transfer from	30 NOV 21	200.00		65.87	TRANSFER BETWEEN EQ ACCO UNTS
		107368221 to 107240632					
30 NOV 21	AAACT21334D9 MLX3PB	Interest	01 DEC 21		0.44	66.31	
		received					
		Capitalise Schedule					
03 DEC 21	FT21337SGD5D	Interac e-Transfer sent	03 DEC 21	40.00		26.31	Interac Debit
15 DEC 21	FT21349T3F0K	Transfer from	15 DEC 21		158.01	184.32	TRANSFER BETWEEN EQ ACCO UNTS
		107240632 to 107368221					
15 DEC 21	FT21349JKTPD	Interac e-Transfer sent	15 DEC 21	50.00		134.32	Interac Debit
15 DEC 21	FT2134968H34	Interac e-Transfer received	15 DEC 21		800.00	934.32	Interac Credit
		Ian McSevney					

15 DEC 21	FT21349RR3Y5	Interac e-Transfer sent	15 DEC 21	850.00	84.32	Interac Debit
15 DEC 21	FT213497CVZF	Interac e-Transfer received	15 DEC 21	650.00	734.32	Interac Credit
Ilan McSevney						
15 DEC 21	FT21349YXWMD	Interac e-Transfer sent	15 DEC 21	650.00	84.32	Interac Debit
16 DEC 21	FT21350XYZJM	Interac e-Transfer received	16 DEC 21	500.00	584.32	Interac Credit
Ilan McSevney						
16 DEC 21	FT21350M4FTD	Interac e-Transfer sent	16 DEC 21	45.00	539.32	Interac Debit
18 DEC 21	FT21352F9YJC	Interac e-Transfer sent	18 DEC 21	60.00	479.32	Interac Debit
19 DEC 21	FT213530K0GP	Interac e-Transfer sent	19 DEC 21	80.00	399.32	Interac Debit
20 DEC 21	FT21354YSMSW	Interac e-Transfer sent	20 DEC 21	40.00	359.32	Interac Debit
20 DEC 21	FT21354C98QD	Interac e-Transfer sent	20 DEC 21	50.00	309.32	Interac Debit
21 DEC 21	FT21355NCJ92	Interac e-Transfer sent	21 DEC 21	100.00	209.32	Interac Debit
21 DEC 21	FT213554Q7J7	Interac e-Transfer sent	21 DEC 21	50.00	159.32	Interac Debit
21 DEC 21	FT213554SSWC	Interac e-Transfer sent	21 DEC 21	50.00	109.32	Interac Debit
22 DEC 21	FT21356CKJG8	Interac e-Transfer sent	22 DEC 21	100.00	9.32	Interac Debit
27 DEC 21	FT213610DRHY	Interac e-Transfer received	27 DEC 21	575.00	584.32	Interac Credit
Ilan McSevney						
28 DEC 21	FT21362Z4PB7	Interac e-Transfer sent	28 DEC 21	565.00	19.32	Interac Debit
30 DEC 21	FT21364B65K8	Transfer from	30 DEC 21	19.32	0.00	TRANSFER BETWEEN EQ ACCOUNTS
107368221 to 107240632						
31 DEC 21	AAACT213653B9BGRYJ	Interest received	01 JAN 22	0.12	0.12	
Capitalise Schedule						
06 FEB 22	FT22037NSJ5R	Interac e-Transfer received	06 FEB 22	100.00	100.12	Interac Credit
Ilan McSevney						
06 FEB 22	FT2203718N8P	Interac e-Transfer sent	06 FEB 22	43.00	57.12	Interac Debit
06 FEB 22	FT22037M4018	Interac e-Transfer sent	06 FEB 22	50.00	7.12	Interac Debit
18 FEB 22	FT22049BBPYW	Interac e-Transfer received	18 FEB 22	200.00	207.12	Interac Credit

Ilan McSevney							
18 FEB 22	FT22049Q7P8P	Interac e-Transfer sent	18 FEB 22	200.00	7.12	Interac Debit	
19 FEB 22	FT22050565LM	Interac e-Transfer received	19 FEB 22	100.00	107.12	Interac Credit	
Ilan McSevney							
19 FEB 22	FT22050WVRKP	Interac e-Transfer sent	19 FEB 22	100.00	7.12	Interac Debit	
20 FEB 22	FT22051VNJ19	Interac e-Transfer received	20 FEB 22	150.00	157.12	Interac Credit	
Ilan McSevney							
20 FEB 22	FT22051V9WNM	Interac e-Transfer sent	20 FEB 22	75.00	82.12	Interac Debit	
21 FEB 22	FT22052D7ML1	Interac e-Transfer sent	21 FEB 22	50.00	32.12	Interac Debit	
21 FEB 22	FT220527JQPG	Interac e-Transfer sent	21 FEB 22	23.00	9.12	Interac Debit	
22 FEB 22	FT220538R6QQ	Interac e-Transfer received	22 FEB 22	140.00	149.12	Interac Credit	
Ilan McSevney							
22 FEB 22	FT22053WX741	Interac e-Transfer sent	22 FEB 22	140.00	9.12	Interac Debit	
22 FEB 22	FT220530D6F2	Interac e-Transfer received	22 FEB 22	100.00	109.12	Interac Credit	
Ilan McSevney							
23 FEB 22	FT22054XWCBS	Interac e-Transfer sent	23 FEB 22	40.00	69.12	Interac Debit	
23 FEB 22	FT220546350J	Interac e-Transfer sent	23 FEB 22	65.00	4.12	Interac Debit	
27 FEB 22	FT2205819HFV	Interac e-Transfer received	27 FEB 22	100.00	104.12	Interac Credit	
Ilan McSevney							
27 FEB 22	FT22058ZDMQV	Interac e-Transfer sent	27 FEB 22	100.00	4.12	Interac Debit	
28 FEB 22	AAACT220592314D3RF	Interest	01 MAR 22	0.01	4.13		
received							
Capitalise Schedule							
01 MAR 22	FT22060K7MVJ	Interac e-Transfer received	01 MAR 22	800.00	804.13	Interac Credit	
Ilan McSevney							
01 MAR 22	FT220604DRXF	Transfer from	01 MAR 22	580.00	1,384.13	TRANSFER BETWEEN EQ ACCO UNITS	
107240632 to 107368221							
01 MAR 22	FT22060NR95P	Interac e-Transfer sent	01 MAR 22	1,300.00	84.13	Interac Debit	
01 MAR 22	FT22060KP25K	Interac e-Transfer received	01 MAR 22	400.00	484.13	Interac Credit	

Ian McSevney

01 MAR 22	FT22060GZMDH	Interac e-Transfer sent	01 MAR 22	200.00	284.13	Interac Debit
02 MAR 22	FT22061L1T2N	Transfer from	02 MAR 22	100.00	184.13	TRANSFER BETWEEN EQ CUSTOMERS

ian@mcsevney.com to [REDACTED]
[REDACTED]

Balance at Period End

184.13

APPENDIX D

Garrafa, Shallon

From: Azeff, Gregory
Sent: Tuesday, March 29, 2022 11:33 AM
To: ian@mcsevney.com
Cc: Peter K. Crawley MBA CA (pcrawley@bdo.ca); Clark Lonergan (clonergan@bdo.ca); Faheim, Monica
Subject: Altmore documents

Mr. McSevney: We are still awaiting documents and other Altmore records from you. As you know, you are required to produce these under both the Receivership Order and the BIA, but we have not yet received anything from you.

As such, you are in continuing breach of the Orders made in the receivership proceeding as well as the BIA.

Once again, we require copies of all documents, correspondence and other records related to Altmore MIC, its business and its affiliates in your possession or control.

GREGORY AZEFF

Partner

Miller Thomson LLP

Scotia Plaza

40 King Street West, Suite 5800

P.O. Box 1011

Toronto, Ontario M5H 3S1

Direct Line: +1 416.595.2660

Fax: +1 416.595.8695

Email: gazeff@millerthomson.com

millerthomson.com



Please consider the environment before printing this email.

MONICA MATTA et al.
Applicants

and

**ALTMORE MORTGAGE INVESTMENT
CORPORATION**
Respondent

Court File No.: CV-21-00662471-00CL

**ONTARIO
SUPERIOR COURT OF JUSTICE - COMMERCIAL
LIST**

Proceeding commenced at TORONTO

**SUPPLEMENT TO THE THIRD REPORT OF BDO
CANADA LIMITED,
IN ITS CAPACITY AS RECEIVER**

MILLER THOMSON LLP

Scotia Plaza
40 King Street West, Suite 5800
P.O. Box 1011
Toronto, ON Canada M5H 3S1

Gregory Azeff LSO#: 45324C

Email: gazeff@millerthomson.com
Tel: 416.595.2660 / Fax: 416.595.8695

Stephanie De Caria LSO#: 68055L

Email: sdecaria@millerthomson.com
Tel: 416.595.2652 / Fax: 416.595.8695

Monica Faheim LSO#: 82213R

Email: mfaheim@millerthomson.com
Tel: 416.597.6087

Lawyers for the Receiver, BDO Canada Limited