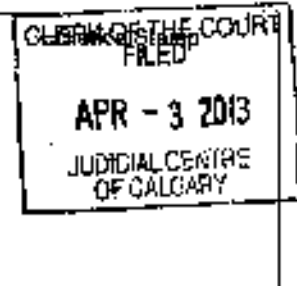


COURT FILE NUMBER 1301-01077
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE CALGARY
APPLICANTS NAWEED IMAM SYED, HASSAN NAWAB RIZVI, JAMAL KAZMI, and SADAQAT HUSSAIN SHAFI
RESPONDENT(S) SHABBIR RIZVI, MANSOOR NAQIV, KHURRA M. RAZA, AGHA SUHAIL HAIDER, and SYED ALI ZULQARN AIN BAQAR
DOCUMENT AFFIDAVIT



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AFFIDAVIT OF NAWEED IMAM SYED
Sworn on April 2, 2013

I, Naweed Imam Syed, make oath and affirm as follows:

1. I am a Founding Member of the Hussaini Association of Calgary (the "Association"), active and in good standing since 1989, as well as a Trustee of the Association, and as such I have a personal knowledge of all matters hereinafter deposed to except where stated to be on information and belief, and in each such instance I verily believe the same to be true.
2. This Affidavit is being filed in support of an application for an interim injunction to prevent the Respondents or un-constitutionally elected/appointed executive of the Hussaini Association of Calgary from running or managing the Association, and for further and other relief as set out herein.

Background of the Hussaini Association of Calgary

3. The Hussaini Association of Calgary is a benevolent association and registered Society with aims and objectives designed to promote the teachings of Shia Islam and to further fellowship and foster respect towards other religious organizations.
4. The Association was founded in 1982 and has been active in both the Islamic and the general Calgary community since that time.
5. The Association currently has approximately 205 active members; it has its own building located at 4755- 34th Street S.E., T2B 3B3, Calgary Alberta where it houses its religious, cultural, educational and spiritual events and is also active with numerous charitable activities throughout the year.
6. The Association is governed by its Constitution and By-Laws ("the Constitution") which were approved in November 2000 and which has never been amended. The full constitution was attached as Exhibit "A" to my Affidavit sworn in this Action on January 22, 2013. The Constitution sets out very strict guidelines relating to, inter alia:
 - how the Association is to be governed;
 - how its Trustees and Executive members are to be elected.
7. I am one of the senior members of the Association and have held office in several capacities including President, Vice President, Secretary, and currently as a two term Trustee. My family and I have been active members in all facets of the Association and its functioning since 1988. I also played an instrumental role in preparing the constitution of this association and it bears my signature as a testament. I am recognized throughout our community as a spiritual, academic, and business mentor for the Association and its members, and have an excellent reputation amongst the members of the Association and in the City of Calgary community at large.

Role of the Association and Importance to its Members and the Community

8. My family and I have built our lives around the Association and that its importance and value to our social, cultural and religious values is fundamental to how we conduct ourselves in all facets of life, both at the personal and professional levels. I believe that this same view is held by the Applicants in this Action and the vast majority of the members of the Association.
9. Over the years, the Association has worked hard to reach out to other communities and to foster collaborative relationships with other ethnic groups living in Calgary, so as to promote mutual respect and understanding among all citizens of Alberta to make Canada prosperous and stronger. I believe that the Association has also enriched the cultural and religious affiliations of the community generally.
10. The Association is central to the daily lives of many of its members, including to the religious and cultural education of its members and more importantly their children. The

Association helps direct and govern, our religious, spiritual, cultural and charitable activities and provides a communal facility for worship and for gatherings such as weddings, Nikha, and other celebrations, as well as funerals etc.

11. Accordingly, any potential harm to the Association, either to its reputation, ability to function, administration or day-to-day operations and our interfaith and interdependent relationship with other communities is of utmost importance to all the undersigned. The Applicants strongly believe that the only way we would continue to contribute to the greater good of Canada is to foster tolerance, respect and civility towards others and to pass on these traditions to our younger generations to come.

The Role of the Trustees and the Executive Committee

12. The Constitution requires the Association to elect both Trustees and an Executive Committee, each with very clearly defined functions and mandate. As per Article 13 of the Constitution, the Trustees are, in effect, the moral and spiritual leaders of the Association and are granted the absolute authority to "oversee the affairs of the Association in an unbiased fashion and in accordance with the Shia Ithna-Ashri faith" and also in compliance with Canadian laws. Pursuant to Article 10, the Trustees are required to act in an advisory and supervisory capacity over the affairs and activities of the Association and to take action at their own initiative to ensure that all activities and/or affairs are conducted according to the Shariah (Islamic law) and within the framework of the Constitution of the Association. The Trustees are the sole custodians of all property owned by the Association.
13. Trustees are elected for a term of five years and as per Article 11 must be a person of high integrity and moral turpitude, with an academic and/or professional background and be a follower of the Shia Ithna-Ashri and Fiqah-e-Jaffria faith. All of the Applicants were elected as Trustees of the Association in for a term of five years.
14. The Executives, as per Article 8 of the Constitution are to "administer the affairs of the Association as set forth in the Constitution" and are charged with the day-to-day operation of the business of the Association so long as they abide by the terms of the Constitution.

Recent Developments, Concerns and Conflicts within the Association

15. Recently, and specifically over the last couple of years, I have become more and more concerned with the direction the Executive as elected in October 2010, being the named individual Respondents in these proceedings, have taken the Association. There is a strong belief held by myself and a large number of other founding and senior members, that the Association is straying from its mission statement and fundamental "Aims and Objectives" as set out in Articles 2 and 3 of the Constitution. We believe that it is in danger of becoming much more radical, extremist and intolerant to both its own, more moderate members, and to the community at large.
16. Over the past two years, the executive members have intentionally invited speakers who incited hatred towards other communities and have attempted to force our local

community members to adopt Sharia Law – inconsistent with our Canadian multicultural values and the law of the land. Moreover, these speakers on numerous occasions have promoted foreign terrorists organizations from the pulpit in attempts to instill extreme Jihadi ideology in our youth's mind. These values are inconsistent with our constitution and in contrast to widely held views of our community members. Moreover, many of the members are of the view that the Respondents and their supporters are promoting "Jihadi ideology" among youth. The Respondents and their supporters have been holding camps for our youth in the mountains with "foreign trained" preachers and are preparing a large contingent of youth to spend several summer months in Iran.

17. This conduct by the individuals name as Respondents has led to ongoing conflict within the Association between members, and specifically members of the Executive (the Respondents in this Action) and their followers, on the one hand, and the more moderate members consisting of the Applicants and a large contingent of present members of the Association. Attached as Exhibit "A" hereto is a form of petition signed by 82 Active Members of the Association, as well as 34 Provisional Members and 16 Non-Members all of whom support the Application filed here, and specifically the setting aside of the Elections held on February 24, 2013, pending resolution of the outstanding issues and in particular, the membership issues. The Applicants estimate that the number of members who have signed the Petition constitutes approximately 40% of the total current Active Members of the Association which we estimate as just over 200.
18. The conflict within the Association has escalated over the last several months to the point where the carrying on of business and worship has been disrupted, arguments and name calling has ensued, and there has been reputation smearing and implicit and explicit threats of physical violence - to the point that I no longer consider this to be safe environment for worship, social gatherings; perhaps a serious threat to the safety of our children and women alike.
19. Despite considerable efforts by myself, other Founding Members of the Association, the Trustees and individuals who are well respected in our community, we have failed to reconcile our differences in an amicable manner between the Respondents and their followers who basically have refused our attempts to mediate or otherwise resolve these conflicts.
20. The Trustees are the moral and spiritual leaders of the Association and are authorized by the Constitution to "take appropriate action at their own initiative to ensure that all ... affairs are conducted according to the Shariah and within the framework of the Constitution of the Association. They will be the sole custodian of any/all movable or immovable property owned by the Association" (Article 10(1)).
21. The duly elected Trustees of the Association, including myself, did attempt to exert our Constitutional authority and take over the operation and administration of the Association in or about January 11, 2013 based on legal advice we had received, but the Respondents refused to step aside thus creating yet another conflict and exploiting

technical issues as to the validity of our status as Trustees.

22. Even in recent communications with all members of the Association as evidenced in **Exhibit "F" to my January 22 Affidavit**, and in response to the attempts of the Trustees as indicated above, the Respondents make the following comments which we know were specifically directed at the Applicants and our supporters:

- "We have arranged Calgary Police Service's presence on the Election Day to protect the safety and independence of HAC's voters to cast their votes";

- "In conclusion, we humbly appeal to Momineen, Mominaat and youth of our community to stand up for the truth and against the tyranny of the few hypocrites"

The use of this type of language is not only threatening and borders on harassment but is extremely offensive to myself and the Applicants from a personal, religious and moral perspective.

23. The Respondents and the individuals who were recently "elected" to serve as members of the Executive Committee on February 24, 2013 (as discussed below) are well aware of all of the outstanding legal, technical and moral issues that are outstanding.
24. I am of the very strong opinion that at the very least, because of these significant philosophical and spiritual divisions that are currently paralyzing the effective operation of the Association, and incidentally threatening its very existence (notwithstanding the technical and legal issues that strongly bring into question the validity of the Respondents to run the day to day affairs of the Association and do what they have recently done regarding the February 24 election), that for moral and ethical reasons, the Respondents have lost their legal and moral authority and entitlement to administer the day to day affairs of the Association and should instead either agree to some form of voluntary methodology within the Association (as provided for example in Article 12 of the Constitution) to resolve these outstanding issues or allow the Courts to determine what steps should be taken.

Elections that were to be held in 2012

25. As per the requirements of the Constitution, election for members of the Executive Committee must be held every two years (Article 8, Section 14). Elections for replacement Trustees shall take place at the same time as elections for the Executive Committee are to be held (Constitution Article 11, Section 6). The last election for members of the Executive Committee was held October 2010.
26. The Applicants and a large proportion of the Members of the Association were very anxious for the elections that were required to take place in October 2012 to be held because we were keen on returning the focus, direction and approach of the Association to where it had been prior to the election of the Respondents in 2010 by supporting and

hopefully electing a more moderate slate of candidates. As a result of actions taken by the Respondents, which will be detailed later on in this Affidavit, and which form part of the legal and technical issues referred to above, the election which should have taken place no later than October 2012 was scheduled for January 27, 2013.

27. The "election" that was allegedly held on February 24, 2013 (because no election was held in October 2012), the Applicants and other members had identified a number of issues, both technical and legal, which call into question several fundamental issues relating to the authority of the Respondents as Executives of the Association to have continued in office as Executive Committee after October 31, 2012 as well as the process, procedure and timing of the proposed election itself.
28. The Applicants, in consultation with other original Founding Members, Trustees and many other members of the Association concluded that it was legally, technically and morally inappropriate for an election to take place on January 27, 2013 or thereafter without all of the outstanding issues as aforementioned being resolved as per the agreement of the general body on November 11, 2012. Those issues are specifically outlined in the section of this Affidavit headed "Legal and Technical Issues Regarding the Election Process".

Commencement, history and status of these Legal Proceedings

29. The Applicants, with my support and the support of other Trustees, Founding and Active members retained counsel and sought legal advice as to how to prevent the election from taking place so as to allow those issues to be properly addressed and resolved.
30. As a result, the Applicants filed an Originating Notice of Motion supported by my affidavit dated January 22, 2013 ("the January 22 Affidavit") and sought and obtained an ex-parte order on January 24, 2013 which, inter alia, prevented the January 27, 2013 election from taking place and effectively transferred day to day operations and management of the Association to the Trustees.
31. The Order, inter alia, declared in Paragraph 4 thereof that "Any election which proceeds on January 27, 2012 shall be invalid". In response to the Order, the Respondents through counsel attended Court Chambers on Monday January 28 2013 to seek a "Stay" of the Order. Our counsel was given telephone notice of the Respondents actions on the morning of January 28 but because of previous commitments was unable to attend Court that morning. A "Stay" of the Order was granted by a Justice in Chambers on that date based on the ex parte application of the Respondents supported only by the Affidavit of Shabbir Rizvi ("the Rizvi Affidavit") which I will specifically address in the forthcoming paragraphs of this Affidavit.

Membership Issues

32. One of the most serious issues facing the Association is that of how to properly determine which members of the Association are qualified to run for the positions of Trustees or Executive Committee or even vote in general elections. The Executive comprised of the Respondents, did not have a definitive list of members supported by the necessary back-

up documentation (proof of payment of membership etc), and an Association Membership Committee was formed in November 2012, for the specific purpose of creating a complete, historical membership list. The Membership Committee has been unable to compile that list, primarily because the Respondents have been very uncooperative and at times have intentionally prevented that Committee from gaining access to required records to formulate the said list. As a result, even if the February 2013 election was validly called by the Respondents, (which the Applicants dispute), any election should not have proceeded until the Membership Committee had compiled an accurate list of members so as to determine who was legally entitled to vote in the election or to run for an office.

33. Specific details of the membership issues are set out in the Affidavit of Mr. Mohammad Abbas filed in support of the Applicants' application. I am providing this brief summary as part of the narrative of the problems and issues the Association is currently facing.

Actions Taken by Respondents Since Receipt of the Stay

34. Notwithstanding the very obvious divisions and conflict within the Association as well as the fact that legal action had been commenced against them, the Respondents unilaterally and without consultation with the Applicants, the Trustees or the General Body, decided to proceed with an election.

35. Accordingly, on February 21, 2013 the Respondents posted notice on the Association website that it was proceeding with elections by taking the position that "under the provision of the court orders, HAC (Hussaini Association of Calgary) elections may commence from the point it was interrupted on January 24". This notice further went on to set a very light schedule for completing the election as follows:

Withdrawal of Nominations Feb 22

Final List of Candidates Feb 23

Elections Feb 24

attached as Exhibit "B" hereto is a copy of that notice.

36. The Respondents proceeded with the election as per the schedule set out above but there was no time set for nomination of candidates for the various positions. It was therefore impossible for the Applicants or anyone else to put forth nominations for either Executive or Trustee positions. As well, participation in any nomination or election process was hampered because of confusion surrounding the legality of any election in view of the these legal proceedings and no Membership List having been compiled by the Membership Committee. There had been a number of candidates for the various positions which had been earlier submitted for the January election, and had that list of nominees stood, an election would have necessarily been required. In that event, the election would not have taken place because of failure to assemble a quorum which by Article 15(1) would require a minimum of 50% of the total Active members. To achieve their aims, the Respondents agenda provided for withdrawal of nominations by February 22, 2013, so that there was only once nominee for each position. In the result, the Executive Committee supportive of the Respondents (including two of the Respondents

themselves who were nominated for different executive positions) were acclaimed as having been elected without the necessity of an actual election. Attached as Exhibit "C" hereto is a copy of the notice issued by the Respondents confirming same. The present Executive is therefore in office only by virtue of the manipulations of the Respondents.

37. With regards to the election of Trustees, the Constitution Article 11 (1), requires that any nominee for Trustee must be a Founding Member of the Association in good standing for ten years. I have previously noted the difficulties the Association and the Membership Committee had in ascertaining who the members of the Association; one of their main issues in respect of any nominations for or election of Trustees is that the Respondents did not provide the Membership Committee with access to ten years of membership information. Notwithstanding the above, the Respondents acclaimed the election of one of the three nominees, Mr. Muzzafar Tahir, who, not surprisingly, is supportive of the Respondents philosophy and methodology for operating the Association, while rejecting the acclamation of two other Trustees who are not supportive of their position, pending determination of their membership. All of this is confirmed in Exhibit "C".
38. The disrupting and aggressive demeanor of Muzzafar Tahir had earlier resulted in his expulsion from the Association. His membership was revoked and never restored. Constitutionally, he is disqualified to run for any office.
39. On the Association website, in the Notice marked as Exhibit "B" hereto, the Respondents have stated as follows:
- Election Committee made every effort to ascertain the eligibility of the candidates in meeting the criteria of ten years uninterrupted HAC membership. The committee formed to establish 10 years record was not able to compile the work and communicated its inability to do so. Election Committee has requested Executives to help in ascertaining the 10 year membership criteria. We are able to verify 10 years members of BR Muzzafar Tahir, therefore he is declared elected as Trustee of HAC. In case of other two candidates we are withholding the announcement until documents are available to confirm their 10 years membership.
40. That the Respondents are able to ascertain 10 year membership data for one member is simply incredible. I believe the Respondents have deliberately approved election of Muzzafar Tahir, as Trustee, and stonewalled the approval for the other two nominees because Muzzafar Tahir is sympathetic to their policies. Given the importance of the role of the Trustees to our Association, the alleged "election" of Muzzafar Tahir by Respondents are very threatening to the operation and security of the Association.

Response to the Affidavit of Shabbir Rizvi

41. There are many untrue and misleading comments in the Affidavit of Shabbir Rizvi dated January 28, 2013 and which was the only document filed by the Respondents in seeking their Stay Order and I now wish to address same.

42. In reply to paragraph 2 and 14 of the Affidavit of Shabbir Rizvi dated January 28, 2013, where he deposes that "...we were provided no notice at all of this Application", the fact is that the Applicants made several requests to the Respondents as to who their legal counsel was in order that they had a contact point that the Applicants' solicitor could make contact. The Respondents continuously delayed in providing this information to the Applicants to where the Applicants' had no alternative but to proceed ex parte because they had to act before the date of the scheduled election, which was January 27, 2013 and the Order was obtained on January 24, 2013.
43. In reply to paragraph 3 of the Affidavit of Shabbir Rizvi dated January 28, 2013, "...the motive of the Applicants... seems to have been to prevent a legal and proper election...", our motivation in bringing this Action was to preserve the integrity and proper operation and functioning of the Association for all of its members and their families, not to prevent an election. Further, as has been indicated throughout this Affidavit, the Applicants take the position that for all of those reasons previously referred to and which are summarized in the section below entitled "Issues regarding the Legality of the Election Process and the Election", the proposed January 27 2013 election and the actual February 24 election were not legally constituted or proper in any way.
44. In reply to paragraphs 4 - 6 of the Affidavit of Shabbir Rizvi dated January 28, 2013, I take great personal exception to the allegation that, in my capacity as Trustee of the Association, I "loaned a great deal of money to favour acquaintances..." and "This resulted in the Applicants resigning as trustee of the Association...". The fact of the matter is that in or about 2003, in my capacity as President, I did arrange a loan of \$5,000 to one of our members who was in dire financial straits at the time. He was suffering with bone cancer and had underwent several surgeries resulting in a prosthetic leg. The loan was for a down payment on a house as he was bringing his family to Canada from overseas. The granting of the loan was approved by the Executive, as well as the then Trustees. Unfortunately he did not repay the loan as promised so I took it upon myself to repay the loan. In or about 2009, I paid \$2,000 and advised the Respondents at that time that upon them providing me with a receipt for that amount, I would promptly pay the balance. For whatever reason, the Respondents refused to provide me with a receipt. Notwithstanding that however, I did pay the remaining \$3,000 in November 2012.
45. To the best of my knowledge, information and belief, there are no outstanding loans owing to the Association that any of the Applicants were involved with. Further, any other loans that we were involved with in our capacity as Trustee were made in strict accordance with the intent and spirit of the Constitution.
46. I believe that the negative comments regarding Hassan Nawab Rizvi are quite simply an attempt to smear the name and reputation of Hassan Nawab Rizvi and distract from the issues raised by the Application. Hassan Nawab Rizvi advises me and I do verily believe that he has never been served with any legal documentation from the Bank of Montreal in regards to any legal action as alleged and he has no knowledge of why he would be

named in that lawsuit.

The Applicants as Trustees

47. In reply to paragraphs 7 – 13 of the Affidavit of Shabbir Rizvi dated January 28, 2013, there is a great deal of confusion as to the status of the Applicants as to whether we are still properly to be considered as Trustees of the Association. It is true that I did tender a written resignation as did Mr. Jamal Kazmi, copies of which are attached to Mr. Rizvi's affidavit but the Chairman of the Board of Trustees, Mr. Zaidi (now deceased) refused to accept our resignations and would not let us step down as Trustees and accordingly, we technically maintained our positions as Trustees. There is an audio tape of this meeting which I would be happy to provide to this Honorable Court confirming these statements. Further, I am advised that a similar situation applies to any verbal resignations put forward by the Applicants Messr Rizvi and Shafi; their resignations were also not accepted by the Chairman. Further, the "Visiting Religious Scholar" does not have the authority under the Constitution or any religious law to determine the validity of the resignations as suggested by Mr. Shabbir in paragraph 11 nor is there any evidence that he in fact did that. My recollection of his comments was that everybody (including the Executive Committee) should consider resigning and new elections be held but the Respondents refused to do so.

Conditions Warranting an Interim Injunction - Serious Issue to be Tried

48. I believe that there are very serious issues to be adjudicated before this Honorable Court including specifically:
- a. the legal authority of the Respondents in their capacity as members of the Association's Executive Committee since October, 2012;
 - b. the validity of any resolutions passed by the General Body of the Association since October 2012;
 - c. the validity of acts and decisions made by the Respondents as the Executive Committee;
 - d. the validity of the February 24, 2013 election; and
 - e. the status of the Applicants as Trustees.

Conditions Warranting an Interim Injunction - General Harm or Inconvenience if an Injunction is not granted

49. All of these issues have a direct impact on the operation, administration and, potentially, the very existence of the Association and, without resolution of same, the Association is essentially unable to properly function; given the importance of the Hussaini Association of Calgary to the community, this would be akin to our local government being unable to function.
50. If an interim injunction is not granted, these outstanding issues which already threaten the functionality and existence of this our religious and spiritual institution, and I believe that it will inevitably lead to greater conflict amongst the members and potentially even worse consequences such as personal threats and physical violence making the Association and its house of worship a place where many members and their families are currently

unwilling or afraid to attend. Given that the educational, spiritual and religious centre of our lives is the Association and its premises, I believe that any delay in the granting of an Order in the nature of an interim injunction coupled with direction from this Honourable Court as to how these issues can best be resolved will be irreparable.

Conditions Warranting an Interim Injunction - Irreparable Harm

51. The problems and legal issues we are currently dealing with are not the type or kind where money or a financial reward can be used to resolve them.
52. The Association is fundamental and central to the religious, spiritual, educational and communal needs of over 200 members and their families in the City of Calgary. There is no other place, either philosophically or realistically where we can go to fulfill these needs, except by termination of the existing Executive, a declaration that any acts under the control of the Executive after November, 2012, is void, including specifically the election(s) of February 24, 2013, and an Order declaring that the control of the Association is vested in the Applicants as the lawful Trustees of the Association.
53. If an interim injunction is not granted, I believe that the Respondents will proceed to install those individuals who were "acclaimed" in the February 24, 2013, election to run the Association. Some of the ramifications of this include:
 - a. the rift and conflicts within the Association will get worse as the extremists will continue to force their point of view on the other members which will have disastrous and harmful results;
 - b. the Respondents and their followers will change how and what we educate our children and we fear (based on their teachings, attitudes and statements to date) that this will involve a more radicalized, extremist, anti-western culture approach;
 - c. the Association will lose total credibility and suffer a loss of respect amongst its many of its followers which may never be rectified or remedied;
 - d. well meaning and highly respected members of our community will face ongoing criticism and character assassinations such as are evident in the Shabbir Affidavit;
 - e. the financial basis of the Association will be threatened and weakened with members leaving or refusing to contribute funds to the Association thereby threatening all of its spiritual and educational programming as well as the Associations ability to provide for important functions such as weddings, funerals etc.
54. I make this affidavit in support of an application for the following:
 - a. An Order declaring that the Applicants continue to be the Trustees for the Hussaini Association of Calgary with full rights, powers, entitlements, and responsibilities as provided for under the Constitution and By-laws;
 - b. An Order declaring that pursuant to Article 8 of the Constitution and By-laws of the Hussaini Association of Calgary, the Executive comprised by the Respondents is declared to have been validly dissolved effective as of January 11, 2013;
 - c. An Order declaring that the Trustees/Applicants are entitled to call an Election for

To: Whom it may concern
Hussaini Association of Calgary

Active Member

Joint letter from Members of the Hussaini Association of Calgary Effective dated February 24, 2013

We, the undersigned members of the Hussaini Association of Calgary, do not accept the elections of the Executives and the Trustees - held on February 24, 2013 for the following procedural and constitutional irregularities:

- The election was based on a voter list that was neither provided nor approved by the Membership Data Compilation Committee (MDCC) as per the General Body resolution dated November 11, 2012.
- There were several errors and omissions in the 2011 & 2012 membership list upon which the current elections were based.
- Final membership list (2011 & 2012) was not ready till the nomination day; final list was not provided to the members.

The undersigned are supportive of the MDCC (formed & approved by the General Body on November 11, 2012) completing their investigations, resolving the irregularities, and compiling an accurate and up to date membership list before calling the election. We believe this to be an important prerequisite for proper elections. The undersigned therefore specifically object to the election held on February 24, 2013, and consider them to be null and void. We strongly urge that the committees appointed by the General Body must first complete its work, generate an appropriate membership list upon which to base the elections.

Muhammed Amer Kazmi [Signature] Feb 24, 2013
Name of Member - Printed Signature of Member Date

MUHAMMAD JAERI [Signature] FEB 24, 2013
Name of Member - Printed Signature of Member Date

JAMAL KAZMI [Signature] FEB 24, 2013
Name of Member - Printed Signature of Member Date

M SADRAQT [Signature] Feb 24/2013
Name of Member - Printed Signature of Member Date

SYED AHMED ALI [Signature] Feb 24/2013
Name of Member - Printed Signature of Member Date

SYED KHADAM [Signature] Feb, 24/2013
Name of Member - Printed Signature of Member Date

Hussain Nawaz [Signature] 24/02/13
Name of Member - Printed Signature of Member Date

[Signature]

This is EXHIBIT "A" to the Affidavit of Nawaz
Iman Syed

TERRANCE M. DAVE Dated this 2 day of April 2013
BARRISTER, SOLICITOR & NOTARY
Commissioner for Oaths

Joint letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

<u>MUHAMMAD AHMAD</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24, 2013</u> Date
<u>Zabihul H. Zaidi</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24, 2013</u> Date
<u>TABASSUM ZAHID</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 27/13</u> Date
<u>FAIZAN KAZMI</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 20/2013</u> Date
<u>Haseem KAZMI</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb/24/2013</u> Date
<u>ARSHAD Rizvi</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb/24/2013</u> Date
<u>S. Umar Rizvi</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24/2013</u> Date
<u>IRFAN KAZMI</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>February 24, 2013</u> Date
<u>RANI KAZMI</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>February 24, 2013</u> Date
<u>NAWEED SYED</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb. 24th 2013</u> Date
<u>Shehri Bano Syed</u> Name of Member - Printed	<u>S. B. Syed.</u> Signature of Member	<u>Feb. 24th, 2013</u> Date
<u>Muhammad Rizvi Zaidi</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24th 2013</u> Date
<u>MASRAN ZAHID</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24 2013</u> Date
<u>NORSEN KAZMI</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb /24/2013</u> Date
<u>Syed Najmaul Hassan Zaidi</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24 - 2013</u> Date
<u>ERUM SAHAR</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24 - 2013</u> Date


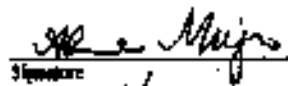
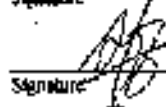


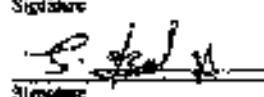
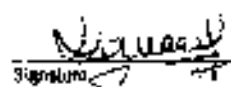
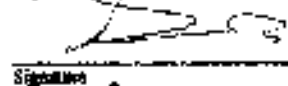
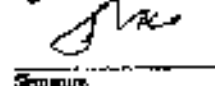


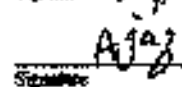


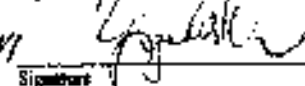
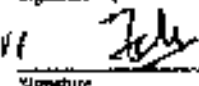
Active Members

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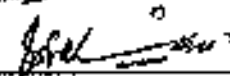






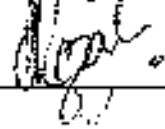


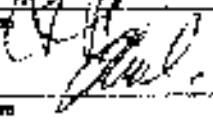
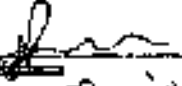


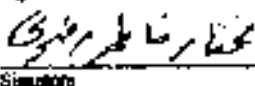
Joint letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

<u>SYED REZA ZAMI</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 05, 2013</u> Date
<u>RUBIA KANWAR SYED</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 05, 2013</u> Date
<u>FEHMIDA BANO</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 5, 2013</u> Date
<u>FARRUKH ABBAS</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 05, 2013</u> Date
<u>FIZZA FARRUKH</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 05, 2013</u> Date
<u>NAEIR ABBAS</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 05, 2013</u> Date
<u>HAIDER ALI</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 06/13</u> Date
<u>Mamaza Jodhi</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>6 MAR 2013</u> Date
<u>SADIA HUSSAIN</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>6 MAR 2013</u> Date
<u>ALI HUSSAIN</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>6 MAR / 2013</u> Date
<u>Kazim Ali</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>6 Mar, 2013</u> Date
<u>Asma Noreen</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>6 Mar, 2013</u> Date
<u>Attia K Shah</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Mar 6, 2013</u> Date
<u>NADIA HUSSAIN</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Mar 6, 2013</u> Date
<u>HASSAN MUJTABA</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 06, 2013</u> Date
<u>SUZIA HUSSAIN</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 06, 2013</u> Date

Joint letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

ALI RAZA Name-Printed	 Signature	06-03-2013 Date
ALMAS MIRZA BAK Name-Printed	 Signature	06-03-2013 Date
Afroz Abbas Name-Printed	 Signature	06-03-2013 Date
M. Mohsin Iqbal Kazmi Name-Printed	 Signature	06-03-2013 Date
Samiul Haider Name-Printed	 Signature	06-03-2013 Date
Syed AZEAL HUSS Name-Printed	 Signature	07/03/2013 Date
KHAWATA RAZA Name-Printed	 Signature	07/03/2013 Date
Syed AZEAL Name-Printed	 Signature	07/03/2013 Date
Thar Name-Printed	 Signature	07/3/2013 Date
KHURRUM MARZA Name-Printed	 Signature	07/3/2013 Date
Shahida Rizvi Name-Printed	 Signature	07/3/2013 Date
Ajaz Mehdi Name-Printed	 Signature	07/03/2013 Date
HASUN MEHDI Name-Printed	 Signature	07th March 2013 Date
WALI NAWAZ Name-Printed	 Signature	MAR 09/2013 Date
SYED ASKARI RIZVI Name-Printed	 Signature	Mar 09/2013 Date
SYEDA ZEBA NAWI Name-Printed	 Signature	Mar 07/2013 Date


Joint letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

<u>Ali SYED</u> Name-Printed	<u></u> Signature	<u>9 - March - 2013</u> Date
<u>Shehnaz Syeda</u> Name-Printed	<u></u> Signature	<u>9 - March - 2013</u> Date
<u>Muqad Hussain</u> Name-Printed	<u></u> Signature	<u>8 - Mar - 2013</u> Date
<u>ZAHID SAMAN</u> Name-Printed	<u></u> Signature	<u>MARCH 9/2013</u> Date
<u>Tarzana Shah</u> Name-Printed	<u></u> Signature	<u>March 9, 2013</u> Date
<u>SYED JAFRI</u> Name-Printed	<u></u> Signature	<u>March 9, 2013</u> Date
<u>SYED MAZHAR</u> Name-Printed	<u></u> Signature	<u>March 10/2013</u> Date
<u>Abida Vasti</u> Name-Printed	<u></u> Signature	<u>March 10/2013</u> Date
<u>SYED TAHRIR RAZVI</u> Name-Printed	<u></u> Signature	<u>MARCH 10th, 2013</u> Date
<u>ANBEL RIZVI</u> Name-Printed	<u></u> Signature	<u>MAY 10, 2013</u> Date
<u>EJAZ HUSSAIN</u> Name-Printed	<u></u> Signature	<u>MAR 10 - 2013</u> Date
<u>KANWAL EJAZ</u> Name-Printed	<u></u> Signature	<u>MAR 10 - 2013</u> Date
<u>SADAF JAFRI</u> Name-Printed	<u></u> Signature	<u>MAR 11, 2013</u> Date
<u>Shahid Raza</u> Name-Printed	<u></u> Signature	<u>March 11, 2013</u> Date
<u>SHAISTA RIZVI</u> Name-Printed	<u></u> Signature	<u>March 12, 2013</u> Date
<u>MUKHTAR F RIZVI</u> Name-Printed	<u></u> Signature	<u>March 12 / 2013</u> Date


Membership list
should be open
to every member
and available
when required

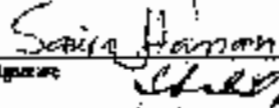
Joint letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

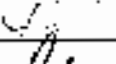
AFTAB AMIN RIZVI  MARCH 12/2013

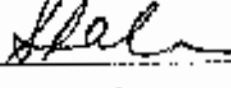
Nazim Butt Shik  MARCH 14/2013

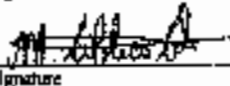
QAMAR NAQVI  MARCH 14/2013

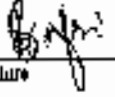
TENZI HASSAN  MARCH 19, 2013

Saira Hassan 

Syed Shakil Akbar  MARCH 17, 2013

Shakeen Raza  MARCH 17, 2013

Abbas Ali Beg  MARCH 17, 2013

ASAD RIZVI  MARCH 17, 2013

Name - Printed Signature Date

Name - Printed Signature Date

Name - Printed Signature Date

Name - Printed Signature Date

Name - Printed Signature Date

Name - Printed Signature Date

Name - Printed Signature Date

Joint letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

IQBAL HAIDER
Name of Member - Printed
[Signature]
Signature of Member
Feb 24/13
Date

NIGIYAS HAIDER
Name of Member - Printed
[Signature]
Signature of Member
Feb 24/13
Date

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Name of Member - Printed

Signature of Member

Date

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Provisional Member Page 1 of 3

Joint letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

<u>S-LED-LABIA Ahmad</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>FEB-24-2013</u> Date
<u>Wasim Rizvi</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>FEB/24 - 2013</u> Date
<u>Samir Fotion</u> Name of Member - Printed	<u>Balwinder Fotion</u> Signature of Member	<u>24/2/13</u> Date
<u>Jaffer Rizvi</u> Name of Member - Printed	<u>Jaffer</u> Signature of Member	<u>24/2/13</u> Date
<u>ACA Rizvi</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>[Date]</u> Date
<u>Sabeen Vasti</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24 2013</u> Date
<u>Asif Vasti</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24/2013</u> Date
<u>IRSA ZAIDI</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24 2013</u> Date
<u>[Signature]</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb 24 2013</u> Date
<u>SP Nawaz H. Nagwi</u> Name of Member - Printed	<u>SP Nawaz</u> Signature of Member	<u>Feb 28 2013</u> Date
<u>SYED SAJEER HYDER</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Feb. 28. 2013</u> Date
<u>Fakhar Abbas</u> Name of Member - Printed	<u>Fakhar Abbas</u> Signature of Member	<u>March 05/13</u> Date
<u>Dilawar Abbas</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 05, 2013</u> Date
<u>H-Khurrum Abbas</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 5, 2013</u> Date
<u>RUBAB KHURRAM</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 05, 2013</u> Date
<u>Zaher Hussain</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Mar 8/2013</u> Date

Joint letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

<u>Ghulam Shahid</u> Name of Member - Printed	<u>Hussaini</u> Signature of Member	<u>March 6, 2013</u> Date
<u>Syed Javed</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>6th March, 2013</u> Date
<u>[Signature]</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 6, 2013</u> Date
<u>Muhammad Ali</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 8, 2013</u> Date
<u>SADIK A ALI</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 03, 2013</u> Date
<u>Abid</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>Mar. 07-2013</u> Date
<u>Zaibain Hassan</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 7th 2013</u> Date
<u>Syed Nadeem Qadir</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 7th 2013</u> Date
<u>Syed Jafar Ali</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 8 20013</u> Date
<u>Syed Zaid</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 9, 2013</u> Date
<u>Muhammad Zafar</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 9, 2013</u> Date
<u>Syed Kashani</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 9, 2013</u> Date
<u>Samar Fatima</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 10/2013</u> Date
<u>[Signature]</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 10/2013</u> Date
<u>Syed Waqar</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>March 11/13</u> Date
<u>[Signature]</u> Name of Member - Printed	<u>[Signature]</u> Signature of Member	<u>_____</u> Date

Joint Letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

SYED SAJJAD HANDEE
Name of Member - Printed

[Signature]
Signature of Member

Mar. 11 / 2013
Date

[Signature]
Name of Member - Printed

[Signature]
Signature of Member

Mar. 11, 2013
Date

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Date

Joint letter from Members of Hussaini Association of Calgary Effective dated February 24, 2013

<u>ANIS HUSSAINI</u> Name- Printed	<u>[Signature]</u> Signature	<u>24 Feb 2013</u> Date
<u>Shakeen Abbas (Babar)</u> Name- Printed	<u>[Signature]</u> Signature	<u>Feb 24 /2013</u> Date
<u>HINA Firdous</u> Name- Printed	<u>Hina Firdous</u> Signature	<u>Feb 24/2013</u> Date
<u>SMAY FARWA</u> Name- Printed	<u>[Signature]</u> Signature	<u>Feb 25/2013</u> Date
<u>SHAN-E-FATIMA</u> Name- Printed	<u>[Signature]</u> Signature	<u>March 6/2013</u> Date
<u>GAULAM RABEANI</u> Name- Printed	<u>[Signature]</u> Signature	<u>March 07 /2013</u> Date
<u>Uzma Tabir</u> Name- Printed	<u>[Signature]</u> Signature	<u>March 7, 2013</u> Date
<u>ERUM ABAS</u> Name- Printed	<u>[Signature]</u> Signature	<u>March 07, 2013</u> Date
<u>Sabeeka</u> Name- Printed	<u>Sabeeka Fatima</u> Signature	<u>MAR 7 2013</u> Date
<u>Mudassar Raza</u> Name- Printed	<u>Mudassar Raza</u> Signature	<u>Mar 7 2013</u> Date
<u>Muhammad Zain</u> Name- Printed	<u>[Signature]</u> Signature	<u>Mar 7 2013</u> Date
<u>KAMAL</u> Name- Printed	<u>[Signature]</u> Signature	<u>March, 07, 2013</u> Date
<u>S. AZFAR HUSSAINI</u> Name- Printed	<u>[Signature]</u> Signature	<u>March, 09, 2013</u> Date
<u>SADAF HUSSAINI</u> Name- Printed	<u>[Signature]</u> Signature	<u>March 10th 2013</u> Date
<u>MOONA RIZA</u> Name- Printed	<u>[Signature]</u> Signature	<u>March 10 2013</u> Date
<u>U.S.K.H</u> Name- Printed	<u>[Signature]</u> Signature	<u>March 11 2013</u> Date

Subject: Results for HAC Elections 2013
To: Syed Suhail Agha <asuhail@hussainicalgary.com>, Shabbir Rizvi <shabbir@hussainicalgary.com>

In the Name of Allah the Most Gracious & Most Merciful,

Assalam o Alaikum,

Dear Momineen, following are the results received from Election Committee for the HAC Elections 2013. Wasalam

Khuram Raza
Hussaini Association of Calgary-Canada

Election 2013

Election Committee is pleased to announce the final list of candidates for the Election 2013.

This is EXHIBIT "E" to the
Affidavit of Nawab
Iman Syed
Dated this 12 day of April 2013
Terrance M. Dawe
Commissioner for Oaths **TERRANCE M. DAWE**
BARRISTER, SOLICITOR & NOTARY

EXECUTIVES:

<u>Position</u>	<u>Candidate</u>
President	Riyaz Khawaja
Vice President	Imtiaz Ali Khan
Secretary	Syed Ali Zulqernain Baqer
Treasurer	Syed Zaheer Rizvi
Coordinator	Mansoor Naqvi

Since only one candidate for each position, they are declared elected by acclamation.

TRUSTEES:

Three candidates submitted nomination papers for the vacant positions of Trustee, namely:

1. Muzzafer Tahir
2. Asim H Zaidi
3. Syed Majaz H Jafri

Election Committee made every effort to ascertain the eligibility of the candidates in meeting the criteria of 10 years uninterrupted HAC membership. The committee formed to establish 10 years record was not able to compile the work and communicated its inability to do so. Election Committee has requested Executives to help in ascertaining the 10-years membership criteria. We are able to verify 10-years membership of Br Muzzafer Tahir, therefore he is declared elected as Trustee of HAC. In case of other two candidates we are withholding the announcement of their election until documents are available to confirm their 10-years membership.

Newly elected Executives may like to call General Body meeting to get a fresh mandate/decision on 10-years membership records compilation and the election for remaining vacant Trustee positions.

Please note that since there are only one candidate for each position and they are declared elected unopposed, there will be no voting on Sunday, February 24, 2013. Election Committee would like to congratulate the newly elected representatives and pray for their success. We would also like to thank everyone who helped us in completing this responsibility and also to those who provided guidance, suggestions and comments.

Election Committee
