

COURT FILE NUMBER Q.B.G. No. _____ of 2016

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE REGINA

APPLICANTS CHARMAINE STICK and CANADIAN TAXPAYERS
FEDERATION

RESPONDENT ONION LAKE CREE NATION

AFFIDAVIT OF CHARMAINE STICK

I, Charmaine Stick, of Onion Lake Cree Nation, in the Province of Saskatchewan, MAKE OATH AND SAY THAT:

1. I am a member of Onion Lake Cree Nation ("Onion Lake") and as such I have personal knowledge of the facts and matters deposed to herein. Where stated to be on information and belief, I verily believe the same to be true.
2. I am not currently a member of the Onion Lake Cree Nation Council (the "Council"), nor have I ever been a member of the Council.
3. I live on the reserve set aside by the Government of Canada for the members of Onion Lake. I have lived on the reserve for effectively my entire life. I have lived there continuously since approximately December, 1988.
4. Like many First Nations in Canada, Onion Lake receives funding from the Federal Government. In addition, Onion Lake also receives substantial revenues from oil and gas royalties.
5. On a number of occasions over the last three years, I requested financial disclosure documents from the Chief and Council that relate to these oil and gas revenues. Many of these requests were made verbally. Every time I asked for these documents I was

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denied by the Chief and Council. In discussing this matter with other members of Onion Lake, I am led to believe that the oil and gas revenues over the past eight years have been significant. As I have been unable to obtain any financial statements relating to the oil and gas revenues I have been unable to confirm this information.

6. On a number of occasions I have also requested financial disclosure documents from Onion Lake regarding the salaries paid to the Chief and Council along with any reimbursements, expenses or other funds paid to the Chief and Council. These requests were made on, at minimum, March 24, 2013, October 16 and 17, 2013, March 17, 2014 and June 15, 2015. On each of these dates, I was denied these documents every time I have asked.

7. From June 19 to July 3, 2014, I protested the lack of financial transparency and accountability by the Chief and Council by performing a hunger strike beside the Band Office. As a direct result of this hunger strike, I was provided with copies of the audited financial statements of Onion Lake for the fiscal years 2012 and 2013.

8. On many of the occasions listed above I also requested to see copies of the various land holding agreements to which Onion Lake is a party, including Treaty Land Entitlement Agreements. I have been unable to obtain any of these requested documents from the Chief and Council. In April, 2015 I met with Elliot Dillon, the Director of Lands for Onion Lake. He informed me that I should attend a meeting scheduled for May 8, 2015 with Black Pearl Resources. However, I was not informed of the location of the meeting and was unable to attend.

9. In a meeting of the members of Onion Lake at the Band Hall in approximately February of 2016 it was announced by Dunlop Muskego, Director of Operations, that audited financial statements for the fiscal year 2015 were available for review by the members of Onion Lake. Within a week I attended at the Band Office to obtain a copy of the 2015 audited financial statements.

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10. When I arrived I requested the Financial Comptroller, Evelyn Netmaker, to produce a copy of the 2015 audited financial statements. Ms. Netmaker provided me with a large binder full of documents that purported to be the 2015 audited financial statements, but refused to allow me to take a copy. She advised that I would only be able to review the documents in the Band Office and would not be allowed to make a copy. Even after reminding her of Dunlop Muskego's comments regarding access to the financial statements (Ms. Netmaker was present at the meeting) she refused to allow me to take a copy of the documents.

11. As I often care for young children during the day, it is not convenient for me to attend the Band Office for an extended period of time to review the audited financial statements. Given the volume of material to be reviewed and the complexity of the documents, I may need to consult others to fully understand the contents.

12. A few weeks after requesting, and being denied, a copy of the 2015 audited financial statements, I ran into Dunlop Muskego and asked him whether members of Onion Lake had a right to copy the audited financial statements. He confirmed his comments at the meeting that members were able to obtain copies of the financial statements. After speaking with Mr. Muskego, I re-attended at the Band Office to speak with members of the Council about the situation.

13. I specifically recall speaking with Councillors Hubert Pahtayken, Quincy Littlewolfe and Dolores Pahtayken, all of whom confirmed that I could get a copy of the audited financial statements. However, when I requested copies of the audited financial statements from Ms. Netmaker, I was denied. Ultimately, I left the Band Office without any audited financial statements in my possession.

14. On September 1, 2016 I provided a formal written request to the Chief and Council for audited financial statements for the fiscal years 2014 and 2015 and certain related

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financial documents. A unsigned copy of the letter I provided is attached as Exhibit "A". This letter was personally delivered by myself to Councillor Dolores Pahtayken on September 1, 2016.

15. On or about September 14, 2016, Councillor Pahtayken advised me that the Chief and Council did not consider my letter of September 1, 2016 to have been properly presented to them. Despite my request, the Chief and Council have refused to provide me copies of audited financial statements or other related documentation.

16. As of September 29, 2016, Wallace Fox was the Chief of Onion Lake and the Councillors were Florence Blois, Hubert Pahtayken, Roy Littlewolfe, Dolores Pahtayken, Doreen Masson, Ivan Harper and Delores Chief. Councillor Joe Dillon recently passed away and I have been advised, and verily believe, that the Elders decided to leave his position on Council vacant until the next election in the spring of 2018.

17. Based on my review of previous audited financial statements, it is my understanding that the fiscal year of Onion Lake ends on December 31.

18. I swear this Affidavit in support of an application compelling Onion Lake to provide me with audited financial statements and other related financial disclosure documents.

SWORN BEFORE ME at the town,)
of Onion Lake in the Province of)
Saskatchewan, this 8th day of)
October, 2016.)
[Signature])

[Signature]
Charmaine Stick

A COMMISSIONER FOR OATHS
for Saskatchewan.
My Commission expires: 2017-04-30.
Or Being a Solicitor

CONTACT INFORMATION AND ADDRESS FOR SERVICE

KANUKA THURINGER LLP
Barristers and Solicitors
1400 - 2500 Victoria Avenue
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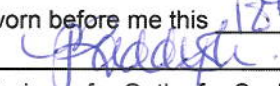
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Lawyer in Charge of File: Jason M. Clayards

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This is Exhibit "A" referred to in the Affidavit of Charmaine Stick. Sworn before me this 12th day of October, 2016.


A Commissioner for Oaths for Saskatchewan. My appointment expires: 2017-04-30 or Being a Solicitor.

August 31, 2016

Onion Lake Cree Nation
Box 100
Onion Lake SK S0M 2E0

Attention: Chief and Council

As a member of the Onion Lake Cree Nation (the "Nation"), I believe that I am entitled to obtain copies of certain documents that explain and disclose various aspects of band operation.

Accordingly, I kindly request that you provide me with copies of the audited consolidated financial statements of the Nation for fiscal years 2014 and 2015. I am also requesting copies of any reports provided by the auditor regarding the 2014 and 2015 financial statements.

In addition to the above documents, I also respectfully request a copy of the Schedule of Remuneration and Expenses that the Nation is required to prepare in accordance with section 6(1) of *The First Nations Financial Transparency Act*, for fiscal years 2014 and 2015, along with any auditor's reports or review engagement reports related to the Schedules of Remuneration and Expenses mentioned above. In the event the Nation declined to prepare a Schedule of Remuneration and Expenses for the years 2014 and 2015, I kindly request an accounting of all revenues and expenses, including individual salaries and other remuneration of the Chief and Council members, for fiscal years 2014 and 2015.

I request that you provide me copies of the documents not later than September 16, 2016. Should you decline to provide me with the requested documents, I respectfully request confirmation of that fact in writing including the grounds for refusing this request.

Yours Truly,



Charmaine Stick