

ONTARIO SUPERIOR COURT OF JUSTICE
(COMMERICAL LIST)

B E T W E E N:

CITY OF TORONTO

Applicant

- and -

HARRY SHERMAN CROWE HOUSING CO-OPERATIVE INC.

Respondent

AFFIDAVIT OF SAREEDA NUR
(Affirmed on December 10, 2025)

I, Sareeda Nur, of the City of Toronto, in the Province of Ontario, MAKE OATH AND SAY:

1. I am a member of the duly elected Board of Directors (the “Board”) of Harry Sherman Crowe Housing Co operative Inc. (“HSC” or the “Co-operative”) and have served in this capacity since April 2019. I have personal knowledge of the matters deposed to in this affidavit, except where stated to be based on information, in which case I believe that information to be true.
2. As a member of the Board, I have been directly involved in the events leading to and following the Court’s appointment of a Receiver over the Co-operative. Since the commencement of the receivership, the Receiver has assumed responsibility for operational matters and has reported to the Court on governance, repairs, financial issues, and future planning. My understanding of the receivership process arises from my role on the Board and from the information communicated to the membership throughout this period.
3. I understand that the receivership process has included efforts to gather information about member interest and eligibility for future governance of the Co-operative, including whether individuals may wish to serve on the Board once governance is returned to the members. I also understand that the Receiver has expressed concerns about the level of member interest in Board participation.
4. I further understand that discussions are taking place regarding the next steps for the Co-operative, including the possibility of returning governance responsibilities to elected directors. As a result of these developments, I have taken steps to inform myself about

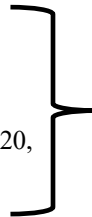
Board responsibilities as well as the process by which individuals may be considered for involvement in future governance.

5. Based on the decisions of the Court and the June 30, 2025, endorsement emphasizing the transitional purpose of the receivership, the Board has assembled a group of community advisors to ensure a smooth transition both in the election process for a new Board and to ensure that the goals and vision of the Board including full compliance with all requirements of the Court and the regulations are met.
6. Some of the key individuals who have come forward to support the Harry Sherman Co-operative in this transition process include individuals who have served in leadership roles. These individuals include:
 - a. **Dr Alvin Curling Former Minister of Housing and Speaker for the House in Ontario.**
 - b. **Miss Angela Cooke who has been a leader in Housing in Canada**
 - c. **Mr Issac Olwahwha Founder of Dream Reality**
 - d. **Mr. Nicholas Thompson. Head of Black Class Action Secretariat**
 - e. **Miss Sharada Narain expert in Board Governance and non-profit.**
 - f. **Mr. Darace Rose Co-Founder and CEO of Oppos Incorporated**

We are committed to working with these advisors and other members of our community to meet all the requirements of the Court and the regulations governing our Co-operative. True copies of the above-mentioned individuals background information and bios are hereto attached and exhibited as “S.N.1”.

7. In light of their experience and the commitment of the Board, I believe it is important that both the Board and this Advisory Board be provided the opportunity to present their own options to the Court regarding future governance. This is especially relevant given the Receiver’s pending motion returnable December 11, 2025, in which the Receiver is seeking Court approval of its proposed RFEIQ governance process and proposed next steps for the Co-operative.
8. I swear this affidavit for the purpose of confirming my interest in future governance participation and for no improper purpose.

SWORN by Sareeda Nur
of the City of Toronto in the
Province of Ontario, before me at
the City of Toronto, in the Province of Ontario,
on December 10, 2025, in accordance with O. Reg. 431/20,
Administering Oath or Declaration Remotely.



Julian Castro Ortiz
Julian Castro Ortiz (Dec 10, 2025 11:54:17 EST)
Commissioner for Taking Affidavits
Julian Castro Ortiz
Barrister and Solicitor LSO #77258V

Sareeda Nur
Reeda Nur (Dec 10, 2025 11:49:44 EST)
Sareeda Nur
Signature of the Deponent

This is **Exhibit “S.N.1”** mentioned and referred to in the

Affidavit of Sareeda Nur

Affirmed this 10th day of December 2025

Julian Castro Ortiz

Julian Castro Ortiz (Dec 10, 2025 11:54:17 EST)

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A Commissioner for Taking Affidavit

Julian Castro Ortiz

Barrister and Solicitor LSO #77258V

BIOGRAPHY OF ALVIN CURLING

Alvin Curling (born November 15, 1939) is a distinguished Jamaican-born Canadian statesman, educator, and diplomat whose decades-long career has left a lasting impact on Ontario politics, Canadian public life, and international relations. Widely recognized as a trailblazer in provincial governance, he was the first Black Canadian to serve as a cabinet minister in Ontario and later became the Speaker of the Legislative Assembly of Ontario. He immigrated to Canada as a young man and pursued his education at Seneca College and York University. His career began in 1972 as an educator, demonstrating early his commitment to literacy, community advocacy, and social progress. From 1981 to 1984, he served as President of World Literacy of Canada, while also contributing to Toronto's Jamaican Canadian Association.

His political career began with a landmark victory in 1985, when he was elected Liberal MPP for Scarborough North with a record-setting 30,504 votes. He became only the second person of colour elected to the Ontario legislature and the sole visible minority MPP during his first term. Shortly after his election, history was made by being appointed Minister of Housing, where he expanded rent control protections and announced a major \$500-million initiative for new urban housing.

In 2003, he achieved another historic milestone when he was unanimously elected Speaker of the Legislative Assembly of Ontario, becoming the first Black Speaker in the province's history. Although his tenure drew debate over partisanship, his appointment symbolized a significant step forward in representation within Canadian political institutions.

He resigned from the legislature in 2005 after 20 years of service to accept an appointment as Canada's Ambassador to the Dominican Republic. He served until 2006, after which he continued to influence public policy as a Senior Fellow at the Centre for International Governance Innovation (CIGI) and as Co-Chair of the Premier's Task Force on the Review of the Roots of Youth Violence, a pivotal initiative addressing systemic issues affecting young people in Ontario.

BIOGRAPHY OF NICHOLAS MARCUS THOMPSON

Nicholas Marcus Thompson a Trinidadian-Canadian human rights advocate, executive leader, and systemic reformer. He also serves as the President and Chief Executive Officer of the Black Class Action Secretariat (BCAS), a national litigation and advocacy organization dedicated to addressing systemic discrimination in employment.

A prominent figure in labour and equity movements, he previously held leadership roles within the Public Service Alliance of Canada, including serving as President of the Union of Taxation Employees Toronto North. Thompson is the founder of the Coalition Against Workplace Discrimination (CAWD)—a multi-sector alliance of labour unions and civil society groups committed to addressing workplace inequities—and the Global Litigation and Advocacy Network for People of African Descent (GLANPAD), an international coalition of delegates from 25 countries focused on combating systemic oppression through strategic litigation and global advocacy.

In 2020, he organized federal employees and spearheaded the proposed \$2.5 billion Black Class Action lawsuit against the Government of Canada. The claim challenges systemic discrimination across 99 federal departments and represents approximately 45,000 Black workers. The Government of Canada has described the case as the “broadest, largest and most high-profile” employment-related discrimination class action in the country’s history. The matter is currently before the Federal Court of Appeal.

He played a key role in advancing legislative and policy reforms in Canada, advocated internationally before the United Nations, and convened global leaders to confront systemic racism. He also served as a guest lecturer at the Lincoln Alexander School of Law, where he teaches on systemic discrimination and equity.

BIOGRAPHY OF SHARADA NARAIN

Sharada Narain is a Chartered Professional Accountant (CPA), a Certified Fraud Examiner (CFE) and also certified in Financial Forensics (CFF). She holds a B.A. from University of Toronto, with a major in Economics. She has over 25 years' experience conducting audits in regulatory environments including the Law Society of Ontario ("LSO"), (17 years) and the Ontario Provincial government. Within the LSO, she worked as an auditor in the Spot Audit Department and assessed the books and records of lawyers and law firms. With the LSO's Trustee Services, as a Forensic Auditor, she assessed the books and records of lawyers and paralegals. In Investigations she worked as a Forensic Auditor where she provided analysis and guidance which lead to remedial actions in accordance with specific governing legislation and regulations. She was entrusted with highly sensitive and high-profile cases where confidentiality and integrity were paramount.

Sharada Narain has a set of fundamental beliefs by which she conducts her life both personally and professionally. Humility, honesty, spirituality and respect influence her daily actions. She is very community minded which as well aligns with her mantra of '*doing good*' and '*giving back*' which is reflected in her volunteering activities.

She also holds education in high regard, and for many years, she was the Co-Chair of the Education Committee for the Toronto chapter of Certified General Accountants (CGA) of Ontario. In addition, she organized book drives for the rural libraries in Guyana and Vietnam, chaired United Way and Federated Health campaigns, organised fund-raising events for the Island Public Natural Science School, and regularly collects linens to be donated to the Toronto Humane Society. She currently serves as the Board President for a large Toronto condominium corporation and has held that position for several years.

She is known for her love of owls but is crazy about cats.

BIOGRAPHY OF ISAAC OLOWOLAGE JR.

Isaac Olowolafe Jr is an award-winning real estate entrepreneur, venture capitalist, and philanthropist, and a 2025 recipient of The King Charles III Coronation Medal. As the founder of the Dream family of companies—including Dream Maker Developments, Dream Legacy Foundation, and related investment ventures—He has become a nationally recognized leader in real estate innovation, Black entrepreneurship, and community economic empowerment in Canada.

A visionary in property development, Isaac led Dream Developments in completing its first major mixed-use project, Dream Residences at Yorkdale, a landmark condominium, townhome, and retail community located across from Yorkdale Mall. He also launched Dream Suites @ YYZ, a boutique hotel near Pearson International Airport, expanding the company's footprint in hospitality. Reflecting his passion for sports and national pride, Dream Developments served as the official jersey sponsor of Canada's Men's and Women's National Basketball Teams from 2017 to 2020.

He holds a Bachelor's degree in Economics from the University of Toronto and has been widely celebrated for his leadership and community impact. His honours include the Harry Jerome Business Award, Planet Africa Enterprise Business Award, the University of Toronto Arbor Award, the Leadership and Governance Canada Business Leadership Award, a Public Service Award from the Transformation Institute for Leadership & Innovation, and a Toronto Board of Trade Award, among others.

Through the Dream Legacy Foundation, Isaac has transformed philanthropy into a catalyst for economic mobility, education, and innovation. Over a decade ago, he has established an endowment for the University of Toronto's African Studies program, marking the beginning of a sustained commitment to academic and community investment. He also joined the Toronto Metropolitan University Innovation Circle and funded the creation of the Isaac Olowolafe Jr. Digital Media Experience Lab in the university's iconic Student Learning Centre.

A champion for Black innovation and entrepreneurship, he funded Canada's first Black tech incubator, the Black Innovation Programs at the DMZ, and co-launched Black Innovation Capital (now BKR Capital), the first institutionally backed venture fund dedicated to Black founders in Canada. As Chair of the Housing Committee of the BlackNorth Initiative, he helped launch the Homeownership Bridge Program, a federally funded partnership with Dream Legacy Foundation and Habitat for Humanity GTA designed to create pathways to homeownership for Black families.

BIOGRAPHY OF DARACE ROSE

Darace Rose is an entrepreneur and cybersecurity executive with more than 20 years of experience leading IT governance, regulatory compliance, and AI-driven security automation across healthcare, finance, technology, and global enterprise environments. His work integrates deep technical expertise with strategic leadership, enabling organizations to modernize their cybersecurity posture, achieve complex compliance readiness, and scale responsibly.

He is the Co-Founder and CEO of Oppos Incorporated, a compliance-as-a-service company that helps organizations meet SOC 2, ISO 27001, HIPAA, GDPR, NIST RMF 2.0, and AI governance requirements through advanced automation (RegAI), secure architecture, and structured advisory frameworks. At Oppos, he designed RegAI, the proprietary automation engine powering Oppos' compliance workflows, and built the company's governance architecture aligned with emerging global standards including the EU AI Act and ISO 42001.

As the Founder of JamRose Management Consulting Ltd., he advises on international expansion strategies, digital transformation, enterprise structuring, and multi-entity shared services development. Darace also provides strategic guidance to startups and SMEs across Canada through government-funded innovation programs, and supports founders in venture capital readiness, operational governance, and cybersecurity modernization.

Across his career, Darace has led enterprise security operations, large-scale IT modernization initiatives, privacy program development, and risk management efforts for multiple organizations. He is also widely recognized for developing scalable cybersecurity and compliance programs, building high-impact partnerships, and enabling SMEs to strengthen resilience in the face of evolving threats.

A contributing member of several global innovation ecosystems, He is active within Morgan Stanley Inclusive Ventures Lab (MSIVL), DMZ, NEXT Canada, Google for Startups, In-Sec-M, and the Ontario Centre of Innovation. He frequently speak on cybersecurity, AI risks, compliance, digital transformation, and youth empowerment, delivering more than 50 engagements across North America. He is also the founder of Oppos Academy, an initiative offering anti-scamming and cybersecurity education to youth in Jamaica and the Caribbean.

His work spans compliance automation, trusted AI governance, secure architecture, government relations, and long-term ecosystem development—positioning as a leading voice at the intersection of cybersecurity, regulation, and innovation.

BIOGRAPHY OF ANGELA COOKE

Angela Cooke is a senior public-sector executive with more than 20 years of national and international leadership experience across Canada and the United Kingdom, specializing in housing, homelessness, urban development, social policy, and anti-racism. A trusted advisor to governments at the highest levels, she authored the Prime Minister of Canada's 2025 Build Canada Homes blueprint, shaping the country's next generation of national housing priorities.

Most recently, she served as Deputy Undersecretary/Assistant Deputy Minister for Housing and Homelessness in Ontario, leading a \$2.4-billion portfolio and the province's mandate to deliver 1.5 million new homes. Prior to this, she held the same senior executive role in British Columbia, overseeing a \$10-billion housing and social infrastructure portfolio, 6,000 staff, and more than 130,000 housing units. In BC, she secured over \$1.4 billion in new funding, led the provincial COVID-19 emergency housing response, created the first Indigenous and First Nations Homelessness Strategy, and advanced landmark anti-racism legislation.

Across both provinces, Angela built and managed multi-disciplinary teams, stewarded complex legislation, strengthened intergovernmental partnerships, and collaborated with municipalities, non-profits, private developers, and Indigenous communities to expand housing supply, modernize systems, and improve outcomes for vulnerable populations.

Previously, she held executive roles with Toronto Community Housing, WoodGreen Community Services, and senior leadership positions in major UK housing authorities.

Court File No. CV-22-00688248-00CL

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PROCEEDING COMMENCED AT TORONTO

AFFIDAVIT OF SAREEDA NUR

BETTY'S LAW OFFICE

2300 Yonge Street, Suite 1600

Toronto, ON

M4P 1E4

Courtney Betty (LSO # 28347U)

Tel: 416-972-472

Email: betty@bettyslaw.com

tenechia@bettyslaw.com