

Court File No.: BK-24-0300383-0031
Estate File No. 31-3003083

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)
[BANKRUPTCY AND INSOLVENCY]**

IN THE MATTER OF THE BANKRUPTCY OF CREATIVE WEALTH
MEDIA FINANCE CORP OF THE CITY OF TORONTO, IN THE
PROVINCE OF ONTARIO

IN THE MATTER OF AN APPLICATION PURSUANT TO SECTION
163(2) OF THE *BANKRUPTCY AND INSOLVENCY ACT*.

**SUPPLEMENTAL MOTION RECORD OF CATALYST WEALTH
MANAGEMENT MEDIA FUND 1, LLC AND THE AD-HOC GROUP**

March 12, 2024

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TAB	DOCUMENT DESCRIPTION	PG NOS.
1.	Supplemental Affidavit of Jeffrey W Krol, sworn March 11, 2024	03 - 05

TAB 1

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SUPPLEMENTAL AFFIDAVIT OF JEFFREY W KROL
(Sworn March 11, 2024)

I, Jeffrey W Krol, of the City of Chicago, in the State of Illinois in the United States of America, MAKE OATH AND SAY:

1. I am a creditor of the above-named bankrupt, as well as an inspector of the bankrupt estate. In addition, I am part of an ad-hoc committee of over 100 investors represented by Tyr LLP who have invested approximately \$100,000,000 in various ways in CWM Finance (the "**Ad-Hoc Group**"). As such, I have personal knowledge of the following matters. Where matters described herein are based on information not within my personal knowledge, I have stated the source of the information and verily believe it to be true.

2. On February 22, 2024, I swore an affidavit (my "**First Affidavit**") in support of motion brought by the Ad-Hoc Group for an order pursuant to section 163(2) of the *Bankruptcy and Insolvency Act*, R.S.C. 1985, c. B-3, as amended.

3. In the sixth line of paragraph 4 of my First Affidavit, I stated that “it is my understanding that Cloth, Gilbert, and Davids had a close relationship”. To avoid any potential misinterpretation of my evidence, I was not stating in that paragraph that Adam Davids had a “close” personal relationship with Jason Cloth, or that their relationship was anything other than a typical relationship that may exist between two individuals who worked at BRON (as defined in my First Affidavit). I was simply stating that my understanding was that given their respective positions at BRON that Mr. Davids had worked with Mr. Cloth and would have information that would be relevant to the administration of the bankruptcy of CWMF (as defined in my First Affidavit).

Sworn or Affirmed before me: (select one): in person OR by video conference

SWORN BEFORE ME by video conference
by Jeffrey W Krol of the City of Chicago, in
the State of Illinois, before me at the City of
Calgary, in the Province of Alberta, on March
11, 2024 in accordance with O. Reg. 431/20,
Administering Oath or Declaration Remotely



Anna White

Commissioner for Taking Affidavits
(or as may be)



JEFFREY W KROL

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**ONTARIO
SUPERIOR COURT OF JUSTICE
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Proceeding commenced at TORONTO

**AFFIDAVIT OF JEFFREY W KROL
(SWORN MARCH 11, 2024)**

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