



EXECUTIVE SUMMARY OF ONGOING LEGAL MATTERS

*For Chief and Council of Wasagamack First Nation
Current to May 29, 2017*

1. 2015 MANAGEMENT ACTION PLAN

Effective April 1, 2015, Wasagamack First Nation adopted the attached Management Action Plan (“MAP”). The MAP was last updated on May 19, 2015. As part of its MAP, Wasagamack First Nation resolved to retire its cumulative debt over a period of 5 years through the use of INAC and Health Program surpluses.

The Financial Plan (attached as Annex B to the MAP) identified \$11,700,000.00 in outstanding debt to creditors and called for offers to be made to these creditors at 75% of the total amount identified for each creditor (i.e. \$8,775,000.00) which amount would be paid out over a period of 5 years (2015-2020).

Annex B-1 to the MAP identifies the breakdown of the outstanding amounts per creditor. Using this information, which we were informed was accurate, we were instructed to present settlement offers to each of these creditors. In October 2015, settlement offers were made, subject to appropriate conditions. For example, all creditors were required to provide us with a sufficient Release to be held until the agreed upon amounts were paid in accordance with the agreed upon payment schedule. Additionally, where the creditor had also sued, a discontinuance or acknowledgment of satisfaction of the lawsuit was also negotiated as part of the terms of settlement.

As part of our due diligence, we conducted searches for each of the creditors to identify proper names, corporate status and contact information. In some cases, our searches revealed that certain corporations had lost their corporate status. In those cases, we were instructed not to present settlement offers.

In at least one case (Kashmiri/Motech), we were made aware of a new claim that was not previously identified in the MAP. In another (FN Supplies), the creditor was not prepared to compromise its account and commenced legal proceedings, which remain unresolved.

Below is a list of all of the MAP Creditors along with a summary of the status of the efforts to settle their accounts.

Legend	
Colour	Means
Green	Matter is resolved.
Yellow	Matter in process of being resolved.
Red	Steps have been taken to resolve matter but a resolution has not and may not be capable of being concluded.

Creditor	Status
C.F.N. Enterprises	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
The Northwest Company	Settlement has been completed.
Chad Enterprises Inc. cob. as Century Petroleum Construction	Settlement offers presented October 2015 and April 2017. Still waiting for a response.
Aboriginal Funeral Chapel	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
George J. Orle Law Corporation	Settlement has been completed.
2449013 Manitoba Ltd. cob. as F N Supplies & Purchasing Services	Currently involved in active litigation. Last offer presented by First Nation was \$300,000k and last offer presented by FN Supply was \$400,000k. Chief and Council must decide whether to continue to defend or to continue settlement discussions.

NWR Accounting Group	Offer has not been made. Still waiting for contact info for creditor. Virginia Harper indicated that she would make inquiries of Health to find information about them and would be searching around the office for documents. Waiting to hear back from her. See email correspondence dated April 24, 2017.
Northland Petroleum Ltd.	No outstanding account identified.
Custom Helicopters Ltd. Canada	Offer accepted. Release received and is being held in trust. 1 st and 2 nd installments forwarded. 3 rd installment due April 30, 2018.
Gateway Mechanical Service Inc. cob. as Gateway Mechanical	Offer accepted. Release received and is being held in trust. 1 st and 2 nd installments forwarded. 3 rd installment due April 30, 2018.
Star Building Materials Ltd.	Settlement offers presented October 2015 and April 2017. Still waiting for a response.
Arnason Industries Ltd.	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
Peace Hills Trust Company	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
McDiarmid Lumber Ltd.	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
Collins Barrow HMA LLP previously HMA Chartered Accountants LLP	Offer accepted. Release received and is being held in trust. 1 st and 2 nd installments forwarded. 3 rd installment due April 30, 2018.

Pembina Chrysler Dodge Jeep	Corporation is dissolved. Acting on your instructions not to make settlement offer.
Northland Fuels Ltd.	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
Altona Books	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
Imperial Soap & Supplies Ltd.	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
Sureway International Electric Inc. cob. as Sureway International	Creditor has no records on their end of outstanding accounts. Have asked First Nation to search their records. Require further information from First Nation.
Brandon Literacy Council Inc.	Settlement offers presented October 2015 and April 2017. Still waiting for a response.
Native Journal (2003) Inc., cob. as Native Journal	Settlement offers presented October 2015 and April 2017. Still waiting for a response.
The Carlton Inn	Initial offer and second offer letters came back undeliverable. Require updated information about debtor.
Parent Holdings Ltd. cob. as Safeguard by Joan Parent	Settlement has been completed.
Children's Safety Books	Settlement has been completed.

Sinclair Dental Co. Ltd.	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
5338949 Manitoba Ltd. cob. as Red River Yamaha	Initial offer came back undeliverable. Looking for an updated address to resend offer.
Gold-Tech Business Products of Canada Limited	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
Fireman's Press (National Medical Publishers Inc.)	Corporation is dissolved. Acting on your instructions not to make settlement offer.
Bio-Static Systems Ltd.	Settlement has been completed.
ERP Business Solutions Inc.	Settlement offers presented October 2015 and April 2017. Still waiting for a response.
Manitoba Hydro	No outstanding account identified.
Grand & Toy Ltd.	Creditor has no records on their end of outstanding accounts. Have asked First Nation to search their records. Require more information from First Nation as to the account claimed outstanding.
Roy V. Wilson (1984) Ltd. cob. Wilson's Business Solutions	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.
Kashmiri/Motech	Offer accepted. Release received and is being held in trust. 1 st , 2 nd and 3 rd installments forwarded. 4 rd installment due April 30, 2018.