

I, **RANDY POTTER**, of the City of Oshawa, in the Region of Durham, in the Province of Ontario

**DO SOLEMNLY DECLARE THAT:**

1. I am the President of Randy Potter Auctioneer Ltd. known as Randy Potter Estate Auction and formerly known as Kahn Auctions.
2. Mr. Donald Robinson of Kinsman Robinson Galleries, encouraged people to buy Norval Morriseau paintings at Kahn Auctions in the timeframe between late 1999 and early 2000.
3. Mr. Donald Robinson successfully purchased 28 lots of paintings in the amount of \$53,228.73 including GST during the timeframe between late 1999 and early 2000 (see attached schedule "A" for the receipts from Kahn Auctions showing the Norval Morriseau paintings sold to Mr. Donald Robinson).
4. Mr. Donald Robinson was unsuccessful in his bid to obtain 40 to 60 lots of Norval Morriseau paintings being sold at Kahn Auctions in the timeframe between late 1999 and early 2000.
5. Mr. Donald Robinson has never returned or attempted to return any of the Norval Morriseau paintings he purchased from my auction and later implied were fake in the May 18, 2001 National Post article.

AND I make this solemn declaration conscientiously believing it to be true and knowing that it is of the same force and effect as if made under oath and by virtue of the Canada Evidence Act.

DATED this 11 day of March, 2005.

  
\_\_\_\_\_  
RANDY POTTER

SCHEDULE "A"

Receipts from Kahn Auctions indicating the sale of Norval Morrisseau paintings to Mr. Donald Robinson on September 29<sup>th</sup> and October 11<sup>th</sup>, 1999, as well as January 5<sup>th</sup>, January 26<sup>th</sup> and March 8<sup>th</sup>, 2000.

Consignment & Estates Our Specialty  
3 Mi North of Hwy 401 On Brook Rd.  
Pickering ON L1V 2P8. (905)683-0041

GST #R66725282

KAHN AUCTIONS WED SEPT 29/99

RECEIPT

Wed Sep 29 21:44:28 1999

Bidder # 103  
DONALD ROBINSON  
1900 BLOOR ST E APT409  
MORRISSEAU ON  
416/964-2374

Lot#	Description	Unit	Price	Quan	Total Bid	Tax
98	NORVAL MORRISSEAU-WARRIORS TN CIRCLE OF LIFE 32X34 1974			1	1200.00	
100	NORVAL MORRISSEAU-34X40			1	1600.00	
109	NORVAL MORRISSEAU-1977 35X74			1	2250.00	
121	NORVAL MORRISSEAU-1978 WINDIGO ENTRAPPED 33X41			1	1950.00	
162	NORVAL MORRISSEAU-1973 THUNDER BIRDS JOHN 52X66			1	4600.00	
	11600.00 (-GST -Tax Purch- Prov-)					0.00
	0.00 (-GST -NonTax Purch- Prov-)				11600.00	
					GST Tax	812.00
					Sales Tax	0.00
					Total	12412.00
	LESS					
					This Payment	12412.00
	<b>Balance Due</b>					<b>0.00</b>

Payment reference: CHECK  
License # R60221732350215  
Tax Exempt # 26430525

REMEMBER THANKSGIVING DAY SALE VIEW:8AM START:10AM 5%BUYERS PREMIUM  
THANKS FOR YOUR PATRONAGE!

**Kahn Country Auctions**  
 Consignment & Estates Our Specialty  
 3 Mi North of Hwy 401 On Brock Rd.  
 Pickering ON L1V 2P8, (905)683-0041

GST #886725282

KAHN AUCTIONS MON OCT 11/99

**RECEIPT**

Mon Oct 11 14:39:37 1999

Bidder # 193  
 DONALD ROBINSON  
 1900 BLOOR ST E APT409  
 MISSISSAUGA ON  
 416/964-2174

Lot#	Description	Unit	Price	Quan	Total Bid Tax
96	NORVAL MORRISSEAU-1971			1	1700.00
129	NORVAL MORRISSEAU-1975 ARTIST & SONS			1	2400.00
151	NORVAL MORRISSEAU-1978			1	2500.00
152	NORVAL MORRISSEAU-1976 GREAT FLOOD			1	1600.00
196	NORVAL MORRISSEAU-1962			1	2250.00
197	NORVAL MORRISSEAU-1960 GRANDFATHER STRONG			1	4900.00
	15350.00 <-GST -Tax Purch- Prov->				0.00
	0.00 <-GST -NonTax Purch- Prov->				15350.00
	Buyer's Premium				767.50
	GST Tax				1128.23
	Sales Tax				0.00
	Total				17245.73
	TERMS				
	This Payment				17245.73
	<b>Balance Due</b>				<b>0.00</b>

Payment reference: CHECK  
 License # R60221732350215  
 Tax Exempt # 26430525

AUCTIONS EVERY WED NIGHT START 6:30 PM VIEW FROM NOON  
 THANKYOU FOR YOUR PATRONAGE!

NOV-27-01 11:24 PM

R.POTTER D.SHEA

9855762267

P.03

Consignment & Estates Our Specialty  
3 Mi North of Hwy 401 on Brock Rd.  
Pickering ON L1V 2P8, (905)683-0041

GST #R86725282

KAHN AUCTIONS WED JAN 5/00

RECEIPT

Wed Jan 5 21:37:12 2000

Bidder # 246  
DONALD ROBINSON  
1900 BLOOR ST E APT409  
MISSTISSAUGA ON  
416/964-2374

Lot#	Description	Unit Price	Quan	Total Bid Tax
77	MORRTSSEAU-1971 24X38		1	700.00
127	MORRTSSEAU-1976 40X26		1	900.00
163	MORRTSSEAU-1976 36X56		1	800.00
167	MORRTSSEAU-1969 28X38		1	1200.00
168	ROBERT DAVIDSON-1975 32X33		1	250.00
205	MORRTSSEAU-1977 73X35		1	1500.00
226	MORRTSSEAU-1978 63X56		1	2100.00
	7450.00 (-GST -Tax Purch- Prov-)			0.00
	0.00 (-GST -NonTax Purch- Prov-)			7450.00
	GST Tax			521.50
	Sales Tax			0.00
	Total			7971.50
	LESS			
	This Payment			7971.50
	Balance Due			0.00

(6)

Payment reference: CHECK  
License # R60221732350215  
Tax Exempt # 26430525

THANKS FOR YOUR PATRONAGE!

Thank you for your patronage.  
Kahn Auctions, Ltd.

Consignment & Estates (Our Specialty)  
 3 Mi North of Hwy 401 On Brock Rd.  
 Pickering ON L1V 2P8, (905)683-0041

GST #R867252R2

KAHN AUCTIONS WED JAN 26/00

RECEIPT

Wed Jan 26 20:58:59 2000

Bidder # 100  
 DONALD ROBINSON  
 1400 BLOOR ST P APT409  
 MISSISSAUGA ON  
 416/964-2374

Lot#	Description	Unit Price	Quan	Total Bid Tax
67	SET OF 4 NORVAL MORRISSEAU 1979 FOUR DIMENSTIONS	250.00	4	1000.00
111A	MORRISSEAU 1983 DIMENSIONAL VTSTON		1	2100.00
115A	MORRISSEAU UNDATED		1	600.00
122	MORRISSEAU-1978		1	2000.00
123	MORRISSEAU-1977		1	2000.00
135A	MORRISSEAU 1961		1	650.00
140B	MORRISSEAU 1984		1	1500.00
	9850.00 <-GST -Tax Purch- Prov->			0.00
	0.00 <-GST -Non/Tax Purch- Prov->			9850.00
	GST Tax			689.50
	Sales Tax			0.00
	Total			10539.50
	LESS			
	This Payment			10539.50
	Balance Due			0.00

10

Payment reference: CHECK  
 License # R60221732350215  
 Tax Exempt # 26430525

DON'T FORGET FINE FURNITURE SALE SUN. JAN 30 START:10AM VIEW:9AM

Thank you for your patronage.  
 Kahn Auctions, Ltd.

NOV-27-01 11:25 PM R.POTTER D.SHEA 9055762267

P.05

Consignment & Estates Our Specialty  
3 Mi North of Hwy 401 On Brock Rd.  
Pickering ON L1V 2P8, (905)683-0041

GST #R86725282

KAHN AUCTIONS MARCH 8 2000

RECEIPT

Wed Mar 8 21:00:47 2000

Bidder # 113  
DONALD ROBINSON  
1900 HLOOR ST E APT409  
MISSISSAUGA ON  
416/964-2374

Lot #	Description	Unit Price	Quan	Total Bid Tax
102	NORVAL MORRISSEAU ACRYLIC ON CANVAS		1	1800.00
103	NORVAL MORRISSEAU ACRYLIC ON CANVAS		1	700.00
109	MORRISSEAU 1971 ACRYLIC ON CANVAS		1	1250.00
189A	1964 MORRISSEAU ACRYLIC ON CANVAS		1	1700.00
	5450.00 <-GST -Tax Purch- Prov->			0.00
	0.00 <-GST -NonTax Purch- Prov->			5450.00
				GST Tax 381.50
				Sales Tax 0.00
				Total 5831.50
	LESS			
				This Payment 5831.50
				Balance Due 0.00

Payment reference: CHECK  
License # R60221732350215  
Tax Exempt # 26430525

PLEASE CALL FOR NEXT AUCTION DATE  
LARGE ANTIQUE AUCTION GOOD FRIDAY APRIL 21 10:00 AM  
TO CONSIGN QUALITY ANTIQUES AND COLLECTABLES CALL 905/683-0041

Thank you for your patronage.  
Kahn Auctions, Ltd.

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