

CANADA )  
 )  
PROVINCE OF ONTARIO )  
TO WIT: )

I, JAMES WHITE, of the City of Toronto, in the Province of Ontario

**DO SOLEMNLY DECLARE THAT:**

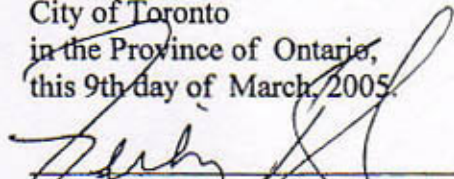
1. I have purchased numerous Norval Morriseau paintings from Kahn Auctions and other sources in the past.
2. I observed Mr. Donald Robinson of Kinsman Robinson Galleries in attendance at the same auctions as myself on several occasions during that timeframe.
3. I have seen Kahn Auctions documentation that Kinsman Robinson Galleries purchased approximately 28 paintings from Kahn Auctions.
4. I took 23 of my Norval Morriseau paintings that I purchased from Kahn Auctions to Kinsman Robinson Galleries to be appraised for insurance purposes.
5. After reviewing my 23 paintings, Mr. Donald Robinson complimented my choices and advised me to be well-insured.
6. After one week with the paintings, Mr. Donald Robinson told me that it would take one more week to complete the appraisals.
7. At no time did Mr. Donald Robinson give me any indication that there was a problem with the appraisals or the authenticity of my paintings.
8. After two weeks with the paintings, Mr. Donald Robinson called me to say that all of the 23 paintings were allegedly fake and could not be appraised.
9. When questioned by me, Mr. Donald Robinson indicated that he did not assess the authenticity of my paintings himself but rather provided Norval Morriseau with pictures of the paintings and two boxes marked YES and NO. I was told by Mr. Donald Robinson that Norval Morriseau allegedly marked the NO boxes beside each of my paintings. Despite my numerous requests, Mr. Donald Robinson has refused to provide a copy of this documentation from Norval Morriseau to me or my lawyer.
10. At no time did Mr. Robinson say that he was consulting Norval Morriseau as to the authenticity of the paintings, indicate his concerns or request my approval to seek third party

assistance.

11. Mr. Donald Robinson also indicated that one of my paintings would appear in an article the following day that would indicate that many of Norval Morrisseau paintings were not authentic. The "Morrisseau Fakes Alleged" article was in the National Post newspaper on May 18, 2001.

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.

DECLARED before me at the  
City of Toronto  
in the Province of Ontario,  
this 9th day of March, 2005.

  
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A Commissioner for taking affidavits  
for the Province of Ontario  
Richard Brooks

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JAMES WHITE