

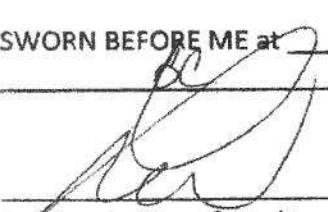
EXHIBIT 32

**Affidavit of Michele Vadas**

1. I am Michele Vadas. My husband, Gabe Vadas, is the executor of the Norval Morrisseau Estate and holder of Norval Morrisseau's copyright. As such, I have knowledge of the matters to which I hereinafter depose.
2. On or about September 17, 2004, Mr. Morrisseau's legal counsel, Clark R. Purves of Purves Hickford & Horne, sent correspondence to the ArtWorld of Sherway which made them aware of suspect paintings. The correspondence included an affidavit by Mr. Morrisseau *"describing numerous fakes and imitations as listed in a catalogue put out by Maslak McLeod gallery."* Hereto attached to this Affidavit as Exhibit "A" find a copy of the letter from Purves Hickford & Horne to ArtWorld of Sherway dated September 17, 2004.
3. The correspondence clearly warned ArtWorld that there was a significant concern with art attributed to Norval Morrisseau and sourced through Maslak McLeod gallery.
4. ArtWorld was further advised *"that Mr. Morrisseau does not have any Representation Agreement with Maslak-McLeod and does not acknowledge any representation of him and his works by Maslak-McLeod."*
5. Lastly, ArtWorld was advised *"that Mr. Morrisseau does not recognize Maslak-McLeod as being able to authenticate any of Mr. Morrisseau's works."*
6. On or about Feb 25, 2005, at the request of Mr. Morrisseau, I phoned Artworld of Sherway and spoke directly with a gallery representative, Donna Child, about commercials the Artworld of Sherway Gallery were airing in conjunction with a CBC documentary on Norval Morrisseau's life and art.
7. On or about February 24, 2005, Mr. Morrisseau had watched the documentary with friends and family, including myself, and was upset that the paintings displayed for sale in the Artworld commercials were not by his hand and were in fact what he described as "abominations" and "fakes."
8. As a result of his request, I called Artworld to enquire where they had obtained the paintings they were advertising and I informed Mrs. Child that Norval had indicated these paintings were not by his hand.
9. Mrs. Child's response was to disclose that Joe McLeod of Maslak McLeod Gallery was the source of the paintings in question. I was further informed that Mr. McLeod told Mrs. Child that he had received them from an undisclosed "gentleman collector."

10. Mr. Morrisseau also had Aaron Milrad, legal counsel at Fraser Milner Casgrain LLP, courier Artworld of Sherway a letter on Feb 25, 2005 on his behalf which informed Artworld of Sherway that the art they were selling that was attributed to Norval Morrisseau was fake and a demand that they cease and desist their sales and advertising of all such works immediately. Mr. Morrisseau also offered to advise them in person which paintings were "fake." To my knowledge, they did not take him up on his offer. Hereto attached to this Affidavit find Exhibit "B", a copy of the letter from Aaron Milrad to ArtWorld of Sherway dated February 25, 2005.
11. Despite the previous legal correspondence and my phone call Mrs. Child chose to continue selling these questionable paintings and ignored Mr. Morrisseau's pleas that they not do so.
12. I verily believe that Ms. Child and Artworld Inc. continue to sell this style of painting to the public despite the fact that Norval Morrisseau, the artist these paintings are being attributed to, referred to such paintings on numerous occasions as "fakes and imitations" through legal correspondence with them.
13. I make this affidavit in Support of Maggie Hatfield's claim and for no improper purpose.

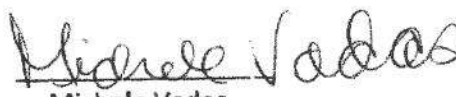
SWORN BEFORE ME at Nanaimo In the Province of BC  
this 30<sup>th</sup> day of JULY, 2010.

  
A Commissioner for taking Affidavits

**TIAH M. WORKMAN**  
NOTARY PUBLIC

#102-6551 AULDS RD  
NANAIMO, BC V9T 6K2  
(250) 390-7681

**PERMANENT COMMISSION**

  
Michele Vadas

PURVES\* HICKFORD\* & HORNE  
Barristers & Solicitors

#203 - 919 Fort Street  
Victoria BC V8V 3K3  
Hickford & Horne: (250) 361-1645  
Purves: (250) 388-7188

Clark R. Purves\*  
Bradley L. Hickford\*  
Rolfe S. Horne  
Fax: (250) 386-6609

September 17, 2004

Artworld of Sherway  
25 The West Mall, #207  
Toronto, ON M5S 1B8

Via Fax: (416) 620-1776

ATTENTION: Managing Director

Dear Sir:

**RE: Norval Morrisseau Show at Artworld of Sherway**

Please be advised that I am counsel for Mr. Morrisseau and Mr. Morrisseau's Power of Attorney, Gabor Vadas. I enclose a copy of an Affidavit with attached Exhibit as sworn by Mr. Morrisseau April 24, 2003, describing numerous fakes and imitations as listed in a catalogue put out by the Maslak-McLeod Gallery. If any of those pieces are for sale by your gallery this weekend, please realize that you are selling fakes.

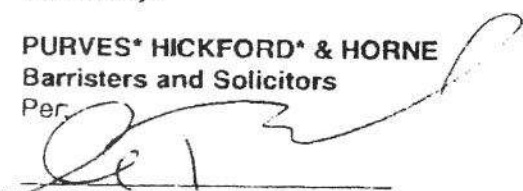
Please also be advised that Mr. Morrisseau does not have any Representation Agreement with Maslak-McLeod and does not acknowledge any representation of him and his works by Maslak-McLeod. Further, please be advised that Mr. Morrisseau does not recognize Maslak-McLeod as being able to authenticate any of Mr. Morrisseau's works.

Please govern yourself accordingly.

Yours truly,

PURVES\* HICKFORD\* & HORNE  
Barristers and Solicitors

Per:

  
CLARK R. PURVES  
CRP/st

Enclosure

- cc. Gabe Vadas/Norval Morrisseau  
cc. Peter Goddard (email)


 val Morrisseau

Exhibit A  
pg 3 of 4

CANADA )  
PROVINCE OF )  
BRITISH COLUMBIA )

To Wit:

I, Norval Morrisseau, in the Province of British Columbia solemnly declare that:

1. That attached hereto as Exhibit "A" to this my Statutory Declaration is the front cover of an art catalogue presently being distributed by Maslak McLeod Gallery of Toronto, Ontario
2. That all of the following works as described by their title and page number as found in the above noted catalogue are fakes and imitations:
  - P. 19 "Leaders of Men";
  - P. 20 "Medicine Bears";
  - P. 20 "Spirit Helpers";
  - P. 21 "Self Portrait as Christ Figure";
  - P. 22 "Sacred Bear Children";
  - P. 22 "Hunter";
  - P. 23 "Sun Totem";
  - P. 26 "Nature Fish";
  - P. 28 "Unity";
  - P. 28 "Arrangements on Brown";
  - P. 28 "Astral Plains";
  - P. 29 "Thunder Birds";
  - P. 30 "Shaman with Sacred Pipe II";
  - P. 30 "Thunderbird Children";
  - P. 31 "Shaman with Medicine Bear and Thunderbird";
  - P. 31 "Shaman, Bear, Loon Cycle";
  - P. 34 "Mother Earth Feed(s) Her Child";
  - P. 34 "Shaman and Spirit Bears";
  - P. 34 "Shaman with Pipe";
  - P. 35 "Warrior and Canoe";
  - P. 36 "Nature as One";
  - P. 37 "Spirit Life";
  - P. 38 "Underworld Spirits are Targets of Inorganic Beings";
  - P. 38 "Family";
  - P. 38 "Spirits and Men";
  - P. 39 "Grand Assembly";
  - P. 41 "Spiritual Battle for Life";
  - P. 44 "Hunters with Moose and Bear";
  - P. 44 "Father and Child";

Norval Morrisseau



Exhibit A  
Pg 4 of 4

- P. 45 "Spirits of the Earth";
- P. 46 "Shaman and Animals Speak";
- P. 47 "Protection and Fruits of a Home";
- P. 47 "Great Migration";
- P. 48 "Bear and Thunderbird Spirits";
- P. 49 "Shaman and Thunderbirds";
- P. 50 "Spirit World II";
- P. 51 "Spirit World";

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AND I make this solemn declaration, conscientiously believing it to be true and knowing that it is of the same legal force and effect as if made under oath.

DECLARED before me at Nanaimo  
in the Province of British Columbia  
this 22<sup>nd</sup> day of April 2003

A Commissioner for taking affidavits  
for the Province of British Columbia

TIAM M. WORKMAN  
NOTARY PUBLIC  
5518 BUTHURFORD RD.  
NANAIMO BC V9T 5M8  
729-9929

Norval Morrisseau



## FRASER MILNER CASGRAIN LLP

Aaron M. Milrad  
Direct Line: (416) 863-4526  
aaron.milrad@fmc-law.com

February 25, 2005

**Delivered by Overnight Courier**  
**Sent via e-mail: artworld@virtuhost.com**

### Private and Confidential

Ms. Donna Kay  
Artworld of Sherway  
25 The West Mall, #207  
Toronto, Ontario  
M9C 1B6

Dear Ms. Kay:

**Subject: Norval Morrisseau**

We are Solicitors for Norval Morrisseau. We were advised by Mr. Morrisseau through his attorney, Gabe Vadas, that various artworks that you are offering for sale attributed to our client are in fact fakes. We and our client are prepared to meet with you and review and advise you of which works you have which are misattributed to our client and must be destroyed or have the name removed from such works and all advertising of such works as being by Norval Morrisseau cease and desist.

At the present time, our client advises us that the works in your possession advertised on your website as by Morrisseau are not by his hand.

Immediately, advise us as to what other works you have, which you are selling as being authentic works by Norval Morrisseau so that they too can be reviewed with our client.

The sale of these fakes are damaging to our client, his reputation, his market and his copyright and intellectual property rights.

FRASER MILNER CASGRAIN LLP

Page 2

Unless you forthwith cease describing and selling these misattributed works as being by our client, we shall no alternative but to recommend the appropriate court action, in which we will claim an injunction, damages, punitive damages and costs on a full solicitor and client indemnity.

May we hear from you within the next five (5) days.

Yours very truly,

**FRASER MILNER CASGRAIN LLP**



Aaron Milrad

AM:mpt

c: Mr. Norval Morrisseau

c: Mr. Gabe Vadas

cc: Mr Don Robinson - Kinsman Robinson Gallery

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