

COURT FILE NUMBER 2303 2303 13143

COURT COURT OF KING'S BENCH
OF ALBERTA

JUDICIAL CENTRE EDMONTON

PLAINTIFFS PRIMERICA, INC., PFSL INVESTMENTS CANADA LTD.,
PRIMERICA LIFE INSURANCE COMPANY OF CANADA,
PRIMERICA LIFE INSURANCE COMPANY, and
PRIMERICA FINANCIAL SERVICES LLC

DEFENDANT MARCO MOUKHAIBER

DOCUMENT **AFFIDAVIT**

ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT
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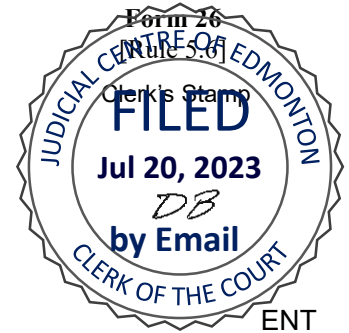
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File Number: 1242844



AFFIDAVIT OF ANGELA KAISER

Affirmed on July 20, 2023

I, Angela Kaiser, of Ottawa, Ontario, Canada AFFIRM AND SAY THAT:

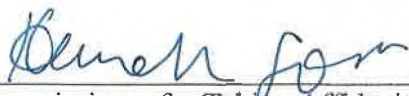
1. I am a summer student employed by the law firm of Osler, Hoskin & Harcourt LLP (“Osler”), counsel for the plaintiffs in this action. As such, I have personal knowledge of the matters contained in this affidavit. Where I do not have direct knowledge of the matters contained in this affidavit, I have outlined the source of the information and believe it to be true.
2. Attached as **Exhibit A** are screenshots taken on July 20, 2023 of a post made by a user named “alwaysmarco” on July 18, 2023 on the “MULTI-LEVEL MARCO” Discord channel, which is found at the following URL: <https://discord.com/channels/1063569939476254780/1063569939983777944>.

3. Attached as **Exhibit B** is a copy of a letter dated July 19, 2023 from counsel for the plaintiffs to the defendant.
4. Attached as **Exhibit C** is a screenshot taken on July 20, 2023 of a YouTube video, titled "Infiltrating A Pyramid Scheme: Primerica", posted on July 14, 2023 to the "Always Marco" YouTube channel, which is found at the following URL: <https://www.youtube.com/watch?v=bDv0I-Zh7uA>.
5. Attached as **Exhibit D** is a screenshot taken on July 20, 2023 of a YouTube video entitled, "Gary Kornegay & Daniel Alonzo's INSANE Interview", which was live streamed on July 19, 2023 and is found at the following URL: <https://www.youtube.com/watch?v=2w3s10iEv0L>.
6. Attached as **Exhibit E** is a screenshot taken on July 20, 2023 of Instagram Reels posted to the "alwaysmarco" Instagram account, which is found at the following URL: <https://www.instagram.com/alwaysmarco/reels/>.
7. Attached as **Exhibit F** is a screenshot taken on July 20, 2023 of TikTok videos posted to the "alwaysmarco" TikTok account, which is found at the following URL: <https://www.tiktok.com/@alwaysmarco>.
8. Attached as **Exhibits G-1 to G-3**, respectively, are screenshots taken on July 20, 2023 of three TikTok videos posted to the "alwaysmarco" TikTok account, which were posted on the dates and at the URLs listed in the below table.


Exhibit	URL	Date
G-1	tiktok.com/@alwaysmarco/video/7257553193842789638	July 19, 2023
G-2	tiktok.com/@alwaysmarco/video/7257227054087720197	July 18, 2023
G-3	tiktok.com/@alwaysmarco/video/7257006482024189190	July 18, 2023

9. Attached as **Exhibit H** are screenshots of Instagram Stories posted by the "alwaysmarco" Instagram account between July 17-19, 2023.

AFFIRMED BEFORE ME at the City of
Ottawa, in the Province of Ontario,
this 20th day of July, 2023.



Commissioner for Taking Affidavits



Angela Kaiser

Hannah Frances Goold,
a Commissioner, etc., Province of Ontario,
while a Student-at-Law.
Expires April 28, 2026.