

*Name of Deponent: Donna Marcotte
Affidavit sworn: June 15, 2005*

ACTION NO: 0401-19905

**IN THE COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL DISTRICT OF CALGARY**

IN THE MATTER OF

**TITAN INVESTMENTS LIMITED PARTNERSHIP, and TITAN GENPAR INC,
and EVOLUTION CAPITAL MANAGEMENT LTD, and THE ESTATE OF
DAVID COMTE, DECEASED, and THE COMTE FAMILY TRUST and
PREDATOR HOLDINGS LTD.**

**IN THE MATTER OF THE *JUDICATURE ACT*, R.S.A. 2000, c. J-2,
and RULES 467 and 468 OF THE ALBERTA RULES OF COURT**

A F F I D A V I T

I, DONNA MARCOTTE, of the City of Weyburn, in the Province of Saskatchewan, MAKE OATH AND SAY THAT:

1. My husband, Michel ("Mich") Marcotte and I are investors in the Titan Investments Limited Partnership ("Titan Partnership"), under the names Michel and Donna Marcotte, and under our company name, Marcotte Properties Ltd. As such, I have a personal knowledge of the matters hereinafter deposed to, except where stated to be based on information and belief, in which case I verily believe the same to be true.
2. My husband and I are farmers residing in Weyburn, Saskatchewan. We have been in the farming business for forty-one years, and have recently decided to retire.
3. In 2001, we were introduced to David Comte through a family member. Between 2001 and 2004, we came to trust David Comte. He told us that he came from Regina and that he was a family man. He claimed to be a stock market trader who finally, after years of practice and study, became good at what he did. At the two Titan Partnership

conventions we attended, David Comte repeated, over and over, "All I want to do is trade. I'm good at it."

4. My husband and I were also good at our business. All through the years we dealt with people who were honest and fair. Often their word or a handshake was good enough. It was in this spirit that we grew to trust David Comte. We took him at his word. Some call us naïve but we believe a man's word should have his honour behind it.

5. Before we joined the Titan Partnership in April, 2002, we had intended to work until 2009, when Mich would be sixty-five, at which time we would retire from farming. However, because the investments in the Titan Partnership were doing so well, we started to sell off land beginning in February, 2003, and we invested more money in the Titan Partnership.

6. In June 2004, we signed the final sale papers for our farm. At that point, we invested more money into the Titan Partnership. This investment was our retirement fund, and we planned to live off that fund, which has now been distributed to other people.

7. As a result of the fraud committed by David Comte, we have been placed in a very distressed financial situation. We are now forced to look for jobs and start over. Mich worked at a farm labour job from April 23, 2005 until May 27, 2005, when seeding was completed. He also started a job at Weyburn Inland Terminal, but could not continue with that position because he did not have the requisite computer skills. Mich intends to work for other farmers during harvest, and has applied for a position at a grain cleaning plant for the winter.

8. I have secretarial training from 1968. However, this training may not be sufficient to find a job, and I may need to go back to school. There are no positions available for me at this time, but I will be looking for work in September.

9. Our trust in man has been shaken ever since we found out that, even though David Comte had not been trading since 2001, some investors in the Titan Partnership feel that they have received their fictitious profits honestly, and that they should be entitled to keep them.

10. David Comte claimed that his auditor found that his books were in order, and claimed that they were audited by a reputable firm. This auditor, Bernadette Henshaw, was acknowledged at the last Titan Partnership annual partners' meeting in October 2004 at Kananaskis, Alberta. David Comte indicated that Ms. Henshaw was his accountant and that she was doing a good job of auditing the books. He asked her to stand up to be acknowledged, which she did. Naturally, we gained confidence in the situation, knowing that the records had been reviewed and were in excellent shape, according to the auditor.

11. At the annual partners' meeting in October 2004, one of the investors in the Titan Partnership asked David what would happen if he and his wife, Janet Comte, were killed in an accident, and who would look after the affairs of the Titan Partnership. David Comte responded by saying that Ms. Henshaw would look after the affairs of the Titan Partnership and that she would disburse the funds and close out the Titan Partnership.

12. David Comte also stated, on numerous occasions, that he would shut down the Titan Partnership and return our money if he were ever to lose one-half of our accounts in trading. As the statements that we had received from the Titan Partnership indicated that our account had doubled, we felt that our original investment was fairly secure. David Comte discussed this with us many different times, over the phone and at the annual meetings.

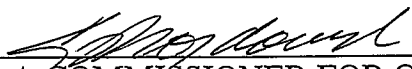
13. On November 24, 2004, we emailed a request to David Comte for a redemption of \$200,000 from our company investment account. Attached hereto and marked as Exhibit "A" is a true copy of the email that we sent to David Comte. The following day, David Comte phoned us and acknowledged that he had received our request for redemption of \$200,000 for November 30, 2004.

14. On December 2, 2004, David Comte emailed us and advised that he had "cash flow issues" and could not provide us with the money immediately, but that he would contact us the following week to let us know how things were going. Attached hereto as Exhibit "B" is a true copy of the email from David Comte to me. Despite this, we did not receive any funds from David Comte or the Titan Partnership. In spite of the fact that we requested money and received nothing, other investors in the Titan Partnership who had not requested anything received large sums of "false profits".

15. As a result of the fraud perpetrated by David Comte, our lives will never be the same, and our financial future will be jeopardized if the Overpaid Investors, being those investors that have received more than seventy-five percent (75%) of their investments in the Titan Partnership, are not required to return the distributions that they received from the Titan Partnership that are more than seventy-five percent (75%) of the amount of their original investment in the Titan Partnership.

16. I make this Affidavit in support of the Joint Application of the Receiver and the Investors Committee.

SWORN BEFORE ME at the City of)
Calgary, in the Province of Alberta,)
this 15th day of June, 2005.)
)
)


A COMMISSIONER FOR OATHS)
in and for the Province of Alberta)

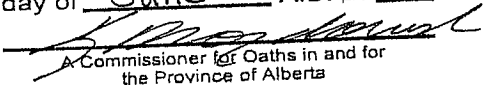

DONNA MARCOTTE

Kelsey J. Drozdowski
Barrister and Solicitor

Donna Marcotte

From: "Donna Marcotte" <d.marcotte@sasktel.net>
To: "David Comte" <dcomte@telusplanet.net>
Sent: Wednesday, November 24, 2004 7:20 PM

Hi David:
Could you please send us a cheque for \$200,000.00 out of Marcotte Properties Ltd. at the end of November (income tax installment time and loan closure before our sale). Thank you.
Mich & Donna Marcotte

THIS IS EXHIBIT " ^A "
referred to in the (^{Affidavit}~~Declaration~~) of
Donna Marcotte
Sworn
Declared) before me this 15th
day of June A.D. 20 05

A Commissioner for Oaths in and for
the Province of Alberta
A Notary Public

Kelsey J. Drozdowski
Barrister and Solicitor

Donna Marcotte

From: "David Comte" <dcomte@telusplanet.net>
To: "Donna Marcotte" <d.marcotte@sasktel.net>
Sent: Thursday, December 02, 2004 3:14 PM
Subject: Cash flow

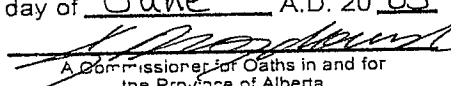
Donna:

We are still working on the cash flow issues we were having at month end. I will keep you apprised of where we are at next week. Please don't hesitate to let me know if you immediately need the cash and I WILL find a way to get it to you. Thanks for all your support and patience!

Have a great day!

David Comte,
Titan Investments LP
Evolution Capital Management Ltd
403/620-1784

"Those who say it cannot be done should not interrupt those who are doing it!"

THIS IS EXHIBIT " B "
referred to in the (^{Affidavit}~~Declaration~~) of
Donna Marcotte
Sworn
Declared) before me this 15th
day of June A.D. 20 05

A Commissioner for Oaths in and for
the Province of Alberta
A Notary Public

Kelsey J. Drozdowski
Barrister and Solicitor

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