

TO:

Canadian Judicial Council  
50 Metcalfe Street, 15th Floor, Ottawa, Ontario, K2P 1P1

**IN THE MATTER OF:**  
The Conduct of The Honourable Justice Allyson Whyte Nowak of the *Federal Court of Canada*

**PURSUANT TO:**  
Subsections 80(c) and 80(d) of the *Judges Act*, R.S.C. 1985, c. J-1

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

**I. INTRODUCTION AND STATUTORY GROUNDS FOR INQUIRY**

**A. The Constitutional Imperative of Judicial Independence and Public Confidence**

1. I write regarding the above.
2. I tender this complaint with a sense of duty and in the utmost good faith, and in the public interest, in light of what I verily believe is one of the most alarming revelations involving the usage of improper logo for a court in a direction, decision, or other disposition. I am unable to find any case law at this time where the breach has been this egregious.
3. As such, a formal complaint is hereby initiated, *ex necessitate legis* (from the necessity of the law), to the Canadian Judicial Council (the “**Council**”) regarding the profound, unprecedented, and systemic misconduct of The Honourable Justice Allyson Whyte Nowak (the “**Subject Jurist**”), a puisne judge of the federal court (the “**Federal Court**”).
4. The constitutional architecture of the Canadian state demands that the judiciary remain an unimpeachable bulwark against executive overreach and administrative lawlessness. It is respectfully submitted that the meticulously documented circumstances elucidated herein expose an unprecedented and egregious fabrication of judicial instruments, the unauthorized usurpation of appellate heraldry, the complete abdication of judicial independence, and the clandestine collusion with members of the executive branch. These actions have effectuated a complete and unconstitutional abdication of the judicial function. Such transgressions mandate an immediate, exhaustive,

and uncompromising inquiry pursuant to the statutory authorities codified within the *Judges Act*, R.S.C. 1985, c. J-1 (the “**Judges Act**”), specifically encompassing the modernized conduct review provisions enacted via Bill C-9.

5. The tenure of superior court judges in common law jurisdictions is deeply anchored in the constitutional principle of security of tenure, historically guaranteed *quamdiu se bene gesserit* (during good behaviour). This protection serves as the ultimate shield against executive interference, ensuring that adjudicative functions are executed without fear of reprisal or hope of reward. However, this profound security is not absolute; it is inextricably counterbalanced by the absolute necessity of institutional accountability. When a judge’s conduct erodes public confidence to a degree that renders the administration of justice in disrepute, the statutory mechanisms of removal are irrevocably activated. The preservation of public trust is not merely a theoretical ideal, but an operational prerequisite for the coercive authority of the courts.

## **B. The Statutory Thresholds for Removal**

4. The specific statutory thresholds engaged herein represent a legislative refinement of the ancient common law standard of “misbehaviour.” These grounds are explicitly enumerated under section 80 of the *Judges Act*, which stipulates that removal is justified if a judge's continuation in office would undermine public confidence in the impartiality, integrity, or independence of the judiciary to such an extent that it would render the judge incapable of executing the functions of judicial office. The specific, intersecting grounds engaged are:
  - a. **Subsection 80(c)**: Failure in the due execution of judicial office. This ground specifically addresses the functional performance and procedural lawlessness of the jurist; and
  - b. **Subsection 80(d)**: Being in a position that a reasonable, fair-minded, and informed observer would consider to be incompatible with the due execution of judicial office. This catch-all provision codifies the objective standard of public trust and institutional legitimacy.
5. These statutory grounds are strictly interpreted through the lens of the common law “Marshall Test,” which demands a rigorous inquiry into whether the conduct alleged is so manifest and totally contrary to the impartiality,

integrity, and independence of the judiciary that the confidence of individuals appearing before the judge, or of the public in its justice system, would be irreparably undermined. It is forcefully submitted that the endorsement of a synthetically fabricated directive, manufactured through the illicit cloning of executive branch metadata, shatters this threshold with unprecedented severity.

## II. THE FACTUAL MATRIX: PROCEDURAL NULLITIES, COLLATERAL ATTACK, AND THE FABRICATION OF JUDICIAL INSTRUMENTS

### A. Procedural Nullities, the Binding June 24 Direction, and Collateral Attack

6. The foundational factual substratum arises from the judicial review proceeding designated under Court File No. T-2448-26 (the “**Proceeding**”). Within the strict procedural parameters of the Proceeding, the respondents (the “**Respondents**”) fell into absolute, uncured statutory default, having failed to file a notice of appearance within the temporal strictures mandated by Rule 305 of the *Federal Courts Rules*, SOR/98-106 (the “**Federal Courts Rules**”).
7. Following the perfected service of the originating application on May 19, 2026—a fact explicitly admitted in writing by the Respondents' own legal counsel—the temporal threshold for adversarial engagement irrevocably lapsed. Consequently, the Respondents were explicitly, statutorily disentitled to notice of any subsequent steps or service of documents pursuant to the mandatory language of Rule 145 of the *Federal Courts Rules*.
8. On June 24, 2026, Associate Judge Crinson, exercising lawful coordinate jurisdiction under Rule 50(1) of the *Federal Courts Rules*, promulgated a binding decision and direction (the “**June 24 Direction**”). Said directive explicitly confirmed the Respondents' disentitlement to notice due to their continuing default and ordered that the applicant's motion be determined strictly in writing pursuant to Rule 369 of the *Federal Courts Rules*. The June 24 Direction constituted a binding judicial order *in limine*, structurally sealing the procedural trajectory of the docket.
9. Notwithstanding this finalized procedural architecture, on July 2, 2026, the Subject Jurist issued a purported direction (the “**Purported Direction**”), functionally overturning and completely eviscerating the procedural trajectory solidified by the June 24 Direction. This intervention was executed *sua sponte*, entirely devoid of any

formal appellate motion under Rule 51 or a motion to vary under Rule 399 of the *Federal Courts Rules*. It is a foundational axiom of Canadian civil procedure that a jurist cannot sit in appeal of, vary, or countermand an order or direction rendered by another jurist in the same proceeding, absent explicit statutory appellate authority.

10. Furthermore, it must be explicitly and forcefully observed that the Purported Direction was ostensibly promulgated on July 2, 2026, the immediate diurnal successor to the Canada Day statutory holiday. It is entirely plausible—and remains a critical matter for the Council's investigatory purview—that the Subject Jurist was not physically or functionally present within her judicial office at the material time. Such a logistical absence would exponentially compound the forensic anomalies, further substantiating the hypothesis that the instrument was either synthesized by extraneous actors and merely rubber-stamped *in absentia* via unverified electronic channels, or, more egregiously, entirely fabricated without her contemporaneous knowledge or authorization.
11. **Nota Bene:** It might be posited by apologists for the administrative apparatus that the issuance of the Purported Direction constitutes a mere curable procedural irregularity amenable to retrospective ratification under Rule 55 of the *Federal Courts Rules*, or perhaps a routine administrative rejection under Rule 72. Such assertions are fundamentally flawed, legally bankrupt, and categorically rejected. A court acting in an appellate capacity is inherently reactive; its jurisdiction is activated solely through the formalized pleadings of an aggrieved party. The assertion of appellate authority absent this formal adversarial activation is a profound jurisdictional error that fundamentally violates the *audi alteram partem* principle.
12. Furthermore, the expiration of the ten-day appellate limitation period under Rule 51 unequivocally extinguished any latent statutory jurisdiction to review the June 24 Direction. The intervention was therefore executed *coram non judice* (before one who is not a judge having jurisdiction). Pursuant to Herbert Broom's enduring maxim *Factum a judice, quod ad officium jure non pertinet, ratum non est* (An act of a judge which does not pertain to his office is of no force), the intervention is classified not as a voidable irregularity, but as an absolute nullity, void *ab initio*. It commands no obedience and is legally unrecognizable.

## **B. Forensic Extraction, Metadata Cloning, and the T-4313-25 Nexus**

13. An exhaustive forensic interrogation of the digital metadata embedded within the Purported Direction has definitively shattered any residual presumption of judicial authenticity. The venerable doctrine of *omnia praesumuntur rite et solemniter esse acta* (all acts are presumed to have been done rightly and regularly) is entirely and completely rebutted when verifiable, objective physical evidence of an administrative defect and synthetic manipulation is tendered.
14. The cryptographic footprint exposes the clandestine utilization of third-party, commercial post-production manipulation software, specifically identified as PDF-XChange Editor and the GrapeCity/Mescius SDK PDF framework. The utilization of such post-production software upon a purported judicial instrument conclusively demonstrates that the document was synthetically assembled, completely bypassing the secure, monitored, and automated Microsoft Word macro-templates natively embedded within the Courts Administration Service (the “CAS”) intranet.
15. Embedded immutably within the core properties of the manipulated document is the metadata title T-4313-25 direction.docx. This internal file identifier corresponds incontrovertibly to an antecedent 2025 Section 18.1 Application for Judicial Review involving the Canada Revenue Agency and the Attorney General of Canada (the “Cloned Proceeding”).
16. The survival of this metadata artifact operates as a cryptographic breadcrumb, invoking the maxim *Ex ungue leonem* (from the claw, the lion). It definitively proves, beyond any standard of administrative doubt, that a preexisting executive branch litigation template was hijacked, digitally sanitized of its original textual contents, and repurposed by external actors to synthesize the Purported Direction. The digital remnants of the Cloned Proceeding fundamentally destroy the premise that the Purported Direction was authored as an original, authentic instrument within the current proceeding.
17. **Nota Bene:** It might be hypothetically asserted that the presence of the T-4313-25 metadata is merely the result of a benign clerical error, such as a registry officer inadvertently recycling a precedent document from the previous calendar year. However, this rationalization is structurally obliterated by the concurrent presence of the fabricated heraldry detailed below. A native CAS template organically generated in 2026 would not inherently contain a 2025 Canada Revenue Agency file number, nor would it contain the specialized crest of an entirely distinct appellate-

level tax tribunal. The convergence of these distinct anomalies mathematically eliminates the possibility of coincidence, confirming deliberate, human-engineered synthesis intended to bypass the lawful docket.

### **C. The Usurpation of Appellate Heraldry, Trademark Contravention, and Executive Typography**

18. The synthetic genesis of the Purported Direction is rendered absolute by a profound heraldic anomaly that strikes directly at the constitutional separation of powers. The Subject Jurist ostensibly authorized an instrument bearing a synthetically grafted iteration of the National Coat of Arms of Canada, rather than the constitutionally mandated 2008 Federal Court Coat of Arms (featuring the winged sea-caribou and the motto *Equity, Droit, Admiralty*).
19. The Federal Court operates strictly utilizing its designated 2008 Coat of Arms to visually separate its trial-level mandate from the executive branch and appellate tribunals. Conversely, the National Coat of Arms is the authorized insignia utilized exclusively by provincial appellate bodies, the Federal Court of Appeal, the Tax Court of Canada, and the executive branch of the federal government.
20. This catastrophic heraldic error firmly links the forgery to the cloned 2025 Tax Court and Canada Revenue Agency template (T-4313-25). The architectural forgery executed betrays a psychological hesitancy—a tactical decision by the external actor to commit a “halfway house” forgery by utilizing grand appellate heraldry to simulate overriding authority, whilst failing to perfectly clone the Trial Division's operational text headers. The equitable maxim *Res ipsa loquitur* (the thing speaks for itself) is forcefully engaged; the heraldic error independently proves the forgery, as a native judge of the Trial Division would never mistakenly appropriate the crest of the Tax Court or the Federal Court of Appeal.
21. The unauthorized commercial superimposition of the National Coat of Arms utilizing third-party software constitutes a direct, actionable contravention of section 9(1)(e) and 9(1)(n.1) of the *Trademarks Act*, R.S.C. 1985, c. T-13, and strictly violates the parameters of Crown copyright as shielded by Article 6ter of the Paris Convention for the Protection of Industrial Property. An instrument generated through the explicit contravention of federal statutes cannot, under any legal fiction, command the coercive authority of the Crown.

22. Furthermore, the document is impermissibly overlaid with the vertical “CANADA” typography, which is strictly governed by the Treasury Board's Federal Identity Program (the “**Federal Identity Program**”). The independent judiciary is constitutionally separate from the Crown's executive ministries, rendering the amalgamation of Federal Identity Program typography onto a judicial directive a structural impossibility within native CAS generation.
23. As a final, terminal structural contradiction, the document contains a boilerplate translation disclaimer pursuant to section 20 of the *Official Languages Act*, R.S.C. 1985, c. 31 (4th Supp.). This footer is strictly and exclusively reserved for substantive Reasons for Judgment or formal Orders disposing of merits; it is never appended to routine administrative registry directions or Rule 72 rejections. Its presence conclusively proves the document was hastily cloned from an antecedent substantive judgment template, and the external actor recklessly failed to sanitize it during the post-production synthesis. *Fraus omnia corrumpit* (fraud vitiates everything); an instrument forged through such reckless synthesis cannot command the coercive authority of the Crown.

#### **D. Clandestine Collusion, the Phantom Registry, and Asymmetric Adjudication**

24. The dissemination of the fabricated instrument was effectuated by a registry officer designated as Ms. Maya-Jo Blake-Janniere. It is a matter of profound institutional alarm that publicly accessible journalistic archives (Oshawa OPP Project Garfield, May 2021) identify an individual bearing this exact, highly unique hyphenated appellation as a primary target indicted within a multi-jurisdictional syndicate regarding illicit firearms, cocaine trafficking, and the possession of property obtained by crime. The deployment of an individual linked to organized crime to unilaterally execute coercive administrative functions suggests the presence of a compromised state informant acting in an administrative capacity. This entirely vitiates the presumption of registry neutrality and engages the maxim *Ex turpi causa non oritur actio* (from a dishonourable cause an action does not arise).
25. This phantom registry personnel operated entirely outside the secure, automated transmission protocols utilized by authentic jurists (specifically, the CAS-SATJ DECISIONS server gateway), engaging in asymmetric, out-of-band communications with opposing counsel. This irregular routing further evidences the clandestine nature of the intervention.

26. The evidentiary record confirms that Mr. Tyler Alviano, currently a junior counsel within the Department of Justice's Tax Law Services Division, served as counsel of record for the Attorney General in the antecedent Cloned Proceeding (T-4313-25). Concurrently, Mr. Jake Norris acts as counsel, or at least has attempted to, for the Respondents in the present matter. It is posited that Mr. Norris, facing a procedural impossibility due to the binding June 24 Direction that cemented his clients' default, engaged in clandestine collusion with Mr. Alviano to obtain this specific tax litigation template albeit in rather clumsily and incompetent fraud if you will.
27. The resulting instrument was funnelled through the compromised registry operative, securing the unverified endorsement of the Subject Jurist *ex parte*, thereby constituting a clandestine, un-docketed “phantom” internal appeal that usurped the formal motion requirements of Rule 399 of the *Federal Courts Rules*. The utilization of Department of Justice templates to manufacture Federal Court directives completely obliterates the separation of powers.

### **III. ABDICATION OF THE JUDICIAL FUNCTION: THE PROHIBITION OF GHOST DRAFTING**

#### **A. The Strictures Against Impermissible Delegation**

28. It is a foundational legal axiom, anchored deep within the rules of natural justice, that “he who hears must decide.” Canadian law strictly prohibits the impermissible delegation of decision-making authority or the “ghost-drafting” of reasons by extraneous actors, most especially including executive branch counsel who appear as frequent litigants before the court.
29. While permissible assistance allows administrative staff or law clerks to research case law, summarize evidence, or draft memorandums under strict, direct judicial supervision, independent drafting by external actors is expressly prohibited. The jurisprudence established in matters such as *Spring v. Law Society of Upper Canada* dictates unequivocally that reasons must be those of the adjudicator, not of the staff, and certainly not of opposing counsel.
30. Furthermore, the Supreme Court of Canada in *Canada (Minister of Citizenship and Immigration) v. Vavilov* (the “*Vavilov*”) emphasized that written reasons are the primary mechanism for demonstrating that the decision-maker

actually applied their own mind to the case. A judge cannot act as a “blind conduit” for an instrument manufactured by the executive branch. The written word must reflect the true intellectual animus of the jurist.

31. The unyielding strictures of judicial independence mandate that a judge must be free from any extraneous influence. The endorsement of a synthetic procedural directive manufactured from a cloned executive branch template, utilizing third-party commercial manipulation software to bypass secure registry templates, constitutes a functional and total abdication of the judicial role.
32. **Nota Bene:** It might be argued in defense of the Subject Jurist that she was entirely unaware of the document's synthetic origins and merely signed or electronically endorsed what was placed before her by the registry. However, a jurist is bound by an absolute, non-delegable duty to meticulously review, verify, and authenticate the structural and substantive integrity of any instrument issued under their sovereign authority. The abdication of this fundamental duty violates the venerable maxim *Delegatus non potest delegare* (a delegate cannot delegate). Willful blindness to the misappropriation of a National Coat of Arms, the inclusion of an *Official Languages Act* boilerplate on a routine direction, and the overriding of a coordinate judge's order is functionally equivalent to active participation in the fraud.

#### IV. SUBVERSION OF THE CJC BLUEPRINT FOR THE SECURITY OF COURT INFORMATION

##### A. Contravention of Information Asset Classifications and Security Protocols

33. The clandestine synthesis of the Purported Direction operates in flagrant, actionable contravention of the *Canadian Judicial Council Blueprint for the Security of Court Information* (the “*Blueprint*”) (Seventh Edition, 2024) and the *Model Definition of Judicial Information* (2020). The *Blueprint* strictly mandates that responsibility for Court Information policies rests exclusively with the judiciary (Policy 3a), ensuring that Judicial Users are provided with their own secure domain isolated from the government domain (Policy 1b).
34. The utilization of PDF-XChange Editor, a commercial, third-party post-production software suite designed to bypass native structural controls, fundamentally subverts the strict supply chain security measures (Policy 8) and

access controls (Policy 13a) mandated by the *Blueprint*. An authentic judicial instrument is an “Information Asset” organically authored within the secure Microsoft Word macro-templates natively embedded within the CAS intranet. The introduction of external manipulation software compromises the integrity of the entire network.

35. By ostensibly endorsing a document manufactured outside the secure judicial intranet, bearing cloned metadata from an executive branch repository (T-4313-25), the Subject Jurist facilitated the contamination of the Court Record. The *Model Policy for the Retention of Court Information* (2022) is irreparably corrupted when a synthetic forgery is injected into the docket, as the “source of truth” relied upon by the Court—and ultimately by the appellate tribunals and the public—is permanently vitiated.

## V. CONTRAVENTION OF THE ETHICAL PRINCIPLES FOR JUDGES (2021)

36. The conduct of the Subject Jurist constitutes a profound, multi-faceted abrogation of the core tenets enshrined within the *Ethical Principles for Judges* (2021). The breach is not merely technical, but strikes at the heart of the moral authority of the bench.
37. **Judicial Independence (Principle 1.A & 1.B):** Principle 1.B explicitly dictates that judges must firmly reject improper attempts to influence their decisions, and that communications intended to influence a specific judicial decision can only be received within the formalized judicial process. The ratification of a “phantom” internal appeal, orchestrated via out-of-band communications between executive branch counsel (Mr. Norris and Mr. Alviano) and a compromised registry operative, completely obliterates this operational independence. The Subject Jurist allowed the executive branch to impermissibly guide the docket behind closed doors, circumventing the applicant entirely.
38. **Integrity and Respect (Principle 2.A):** Principle 2.A mandates that judges conduct themselves in a manner that is above reproach in the view of reasonable and informed persons. Endorsing an instrument bearing a misappropriated National Coat of Arms, overlaid with Treasury Board FIP typography, and manufactured from a cloned tax template violently offends the integrity of the judicial office. It projects an appearance of profound impropriety, incompetence, and institutional lawlessness.

39. **Impartiality (Principle 5.A & 5.B):** Principle 5.B commands that judges avoid conduct which could reasonably cause others to question their impartiality. A reasonable, fair-minded, and informed observer, apprised of the forensic metadata manipulation, the heraldic forgery, and the clandestine collusion of junior Department of Justice counsel to shield defaulting respondents, would irrefutably conclude that the Subject Jurist operated as a partisan shield for the executive branch, thereby completely shattering the presumption of impartiality.

## **VI. JURISPRUDENTIAL ANALYSIS: FAILURE IN DUE EXECUTION AND INCOMPATIBILITY**

### **A. The Unprecedented Severity: Contrast with *Goodman*, *Doyle*, and *St-Pierre***

40. It must be stated with absolute, unequivocal clarity: the malfeasance identified herein is exponentially more severe, destructive, and institutionally corrosive than the infractions adjudicated in recent Canadian Judicial Council jurisprudence. This is not a matter of administrative delay or inadvertent oversight; it is the overt usurpation of sovereign logos, the misappropriation of a Coat of Arms, and a complete, deliberate abdication of Judicial Independence through the ratification of a forgery.
41. In the recent decision regarding The Honourable Andrew J. Goodman (CJC Files: 24-0799 / 24-0818, June 23, 2025) (the “*Goodman*”), the Council determined that inadvertently reading the wrong version of a sentencing decision and failing to disclose the error for fourteen months constituted a “serious ethical lapse,” resulting in a public reprimand. In stark contradistinction to the inadvertent, albeit serious, administrative delay adjudicated within *Goodman*, the conduct of the Subject Jurist herein involves the active, deliberate ratification of a synthetically forged instrument bearing cloned metadata and misappropriated executive heraldry. This transcends mere administrative error and enters the realm of systemic subversion and institutional fraud.
42. Furthermore, in the matter of The Honourable Arthur Doyle (CJC File 24-0144, Nov 12, 2024) (the “*Doyle*”), the tribunal characterized an undisclosed conflict of interest involving a former law partner as an “honest mistake” regarding “cooling-off” periods, resulting in a private measure. The Subject Jurist's conduct—ratifying an out-of-band, asymmetric phantom appeal orchestrated by executive branch counsel to unlawfully shield a defaulting

party—cannot conceivably be construed as an “honest mistake.” It is a calculated evisceration of the *audi alteram partem* principle and the deliberate weaponization of the judicial apparatus.

43. Similarly, the matter of The Honourable Marc St-Pierre (CJC File 24-0784, May 27, 2025) (the “*St-Pierre*”), dealt with inappropriate, sarcastic comments constituting a failure in the “duty of reserve.” The usurpation of the judicial apparatus through forensic forgery, the contravention of the *Trademarks Act*, and the deployment of compromised registry personnel is infinitely more destructive to the foundation of the institution than intemperate courtroom commentary. Words may offend, but forgery destroys the very currency of the court.

#### **B. Failure in Due Execution (Subsection 80(c))**

44. “Failure in due execution” addresses the judge who has functionally abdicated the responsibilities of the office. In *Re Cosgrove* (the “*Cosgrove*”), the Council established that a “global” incompetence, characterized by a failure to conduct proceedings in accordance with basic rules, constituted a failure in due execution. The Subject Jurist's *sua sponte* obliteration of a coordinate judge's binding directive, absent lawful appellate jurisdiction and in defiance of the rule against collateral attack, mirrors such global procedural incompetence and abdication of control.
45. Furthermore, the Supreme Court of Canada affirmed in *Re Ruffo* (the “*Ruffo*”) that procedural lawlessness and the refusal to be bound by the constraints of the office constitute a failure in the due execution of judicial office. The Subject Jurist's total disregard for the strict appellate mechanisms mandated by Rule 51 of the *Federal Courts Rules* epitomizes such lawlessness.

#### **C. Incompatible Position (Subsection 80(d))**

46. “Incompatible position” functions as a relational standard, measuring the rupture of the bond of trust between the judge and the public, evaluated through the objective lens of the “reasonable, fair-minded, and informed observer.”
47. The inquiry into The Honourable Michel Girouard (the “*Girouard*”) solidified the paradigm of the “Fatal Compromise.” The Council concluded that a judge who lacks transparency fatally compromises their integrity, as

the judicial office is built entirely upon the currency of truth. A judge who counterfeits that currency—by endorsing a forged instrument bearing a false crest and cloned executive metadata—is instantly incompatible with the continuation of their duties.

48. The paradigm of the reasonable observer was firmly established in the inquiry of Justice Robin Camp (the “*Camp*”). A reasonable, fair-minded, and informed observer, apprised of the forensic metadata manipulation, the heraldic forgery, the cloning of a Canada Revenue Agency file, and the Ghost Drafting by junior Department of Justice counsel, would view the Subject Jurist's continuation in office as manifestly and profoundly destructive to the Rule of Law.

**VII. SYNTHESIS OF REMOVAL GROUNDS AND JURISPRUDENCE**

49. The operational definitions of the statutory grounds for removal are synthesized within the following tabular compilation:

| Statutory Ground                    | Focus                  | Key Question                                                                                                                     | Leading Jurisprudence                                                                                                                       |
|-------------------------------------|------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Failure in Due Execution (s. 80(c)) | Functional Performance | Is the judge doing the job effectively, independently, and legally without delegating adjudicative power or ratifying forgeries? | <i>Cosgrove</i><br><br>(Incompetence/Loss of Control)<br><br><i>Ruffo</i> (Procedural Lawlessness)<br><br><i>Dugré</i> (Abdication of Duty) |
| Incompatible Position (s. 80(d))    | Relational Trust       | Does the public trust the judge to be impartial, honest, and impervious to                                                       | <i>Camp</i> (Manifest Bias/Reasonable Observer)                                                                                             |

|  |  |                                                                 |                                                                                                                       |
|--|--|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
|  |  | executive influence, ghost drafting, and clandestine collusion? | <i>Girouard</i> (Fatal Compromise/Integrity)<br><br><i>Matlow</i> (Executive Blur)<br><br><i>Einfeld</i> (Dishonesty) |
|--|--|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|

50. **Nota Bene:** The Council has historically evaluated whether conduct is “remediable” (as seen in *Goodman*, *Doyle*, or *Matlow*). However, the cases of *Girouard* and *Einfeld* establish a hard line: the endorsement of a fabricated instrument, the circumvention of lawful appellate mechanisms, and the ensuing deceit upon the Court cannot be cured by a reprimand, mentorship, or sensitivity training. It is an intrinsic failure of mindset, independence, and integrity that permanently fractures the moral authority to adjudicate.

**VIII. CONCLUSION AND PRAYER FOR RELIEF**

51. The jurisprudential architecture demands that the “due execution” of the judicial office encompasses the embodiment of absolute impartiality, intellectual independence, and an unyielding commitment to procedural transparency. The Subject Jurist, by endorsing a synthetically manufactured instrument characterized by forensic software manipulation, cloned executive branch metadata, and heraldic forgery, has completely abrogated the fundamental obligations of the judicial office.
52. The intervention, executed *sua sponte* and entirely *coram non judice*, disrupted the orderly administration of justice, effectively nullified the valid direction of an Associate Judge without lawful appellate jurisdiction, and permitted the administrative apparatus to be weaponized as an unconstitutional shield for defaulting litigants. The utilization of compromised registry personnel and the ratification of ghost-drafted instruments from the executive branch

subvert the separation of powers and make a mockery of the *Ethical Principles for Judges* and the *Blueprint for the Security of Court Information*.

53. The *Primus Inter Pares* (First Among Equals) doctrine dictates that the apex judicial authorities must intercede to preserve the institutional repute of the Court. Whilst absolute confidence is maintained that the three respective Chief Justices, having been formally apprised of this matter, shall execute the necessary and appropriate supervisory interventions to rectify the immediate docket anomalies, the profound gravity of the malfeasance necessitates that this formal complaint be concurrently advanced to the Council in the paramount public interest. The systemic threat posed by the fabrication of judicial instruments transcends any single proceeding. It is respectfully submitted that the aforementioned conduct represents a manifest and total departure from the standards of impartiality, integrity, and independence. The resulting loss of public trust is irretrievable.

54. **ACCORDINGLY**, it is formally requested that the Canadian Judicial Council immediately initiate a comprehensive inquiry into the conduct of The Honourable Justice Allyson Whyte Nowak, and ultimately tender a recommendation to the Minister of Justice for her removal from the bench pursuant to section 80 of the *Judges Act*, to unequivocally preserve the *status quo ante* and vindicate the dignity of the administration of justice.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED.**

A handwritten signature in black ink, appearing to be 'K. McLean', with a stylized flourish at the end.

**Mr. Kevin A. McLean (BA, JD, CIM)**

*(Nota Bene: The July 13, 2026, Urgent Notification of Institutional Fraud to the Chief Justices has been transmitted separately and serves as an independent evidentiary appendix to this formal complaint. It is attached herein as Appendix "A")*

## APPENDIX “A”

**TO:**

**The Honourable Gabrielle St-Hilaire**  
**Chief Justice of the Tax Court of Canada**  
**200 Kent Street, Ottawa, Ontario K1A 0M1**

**The Honourable Yves de Montigny**  
**Chief Justice of the Federal Court of Appeal**  
**90 Sparks Street, Ottawa, Ontario K1A 0H9**

**The Honourable Martine St. Louis**  
**Acting Chief Justice of the Federal Court of Canada**  
**90 Sparks Street, Ottawa, Ontario K1A 0H9**

**SUBJECT I: URGENT NOTIFICATION OF INSTITUTIONAL FRAUD: THE UNAUTHORIZED MISAPPROPRIATION OF THE NATIONAL COAT OF ARMS AND TAX COURT OF CANADA HERALDRY WITHIN A FABRICATED FEDERAL COURT (TRIAL DIVISION) INSTRUMENT**

**SUBJECT II: THE DISCOVERY OF A SYNTHETIC PROCEDURAL DIRECTIVE MANUFACTURED FROM A CLONED CANADA REVENUE AGENCY PROCEEDING (T-4313-25), THE CONTRAVENTION OF THE TRADEMARKS ACT, AND THE UTILIZATION OF COMPROMISED REGISTRY PERSONNEL**

**SUBJECT III: THE CLANDESTINE COLLUSION OF JUNIOR DEPARTMENT OF JUSTICE COUNSEL AND THE CONSEQUENT SUBVERSION OF THE ADJUDICATIVE APPARATUS**

**Dear Chief Justices:**

**Part I: Introduction and the Invocation of Supervisory Appellate Jurisdiction**

1. Correspondence is hereby initiated *ex necessitate legis* (from the necessity of the law) to urgently alert the apex supervisory authorities of the federal appellate, tax, and trial jurisdictions to a catastrophic, systemic breach of institutional integrity. It is submitted that this breach encompasses the overt, malicious fabrication of a judicial instrument and the flagrant misappropriation of protected state heraldry, striking directly at the foundational constitutional architecture of the federal judiciary.
2. The preservation of public confidence in the administration of justice is entirely predicated upon the unimpeachable authenticity of the instruments issued under the sovereign authority of the courts. When the

internal mechanisms designed to safeguard this authenticity are ostensibly bypassed, subverted, or hijacked by external actors, a constitutional crisis of the highest magnitude is precipitated. Such a crisis demands immediate, uncompromising, and non-delegable intervention by the chief judicial officers, whose paramount duty is the rigorous defense of the institution's procedural sanctity.

3. It is advanced that a purportedly binding procedural instrument, ostensibly issued on July 2, 2026, within the Federal Court proceeding designated as T-2448-26, and attributed to Justice Allyson Whyte Nowak (the "**Purported Direction**"), constitutes a synthetic forgery of the most egregious nature. This document is definitively not a product of the organic, secure adjudicative processes native to the Federal Court. Rather, it represents a manufactured nullity injected into the active docket through clandestine and wholly unauthorized avenues.
4. The Purported Direction operates as an impermissible, horizontal collateral attack upon the prior, authentic, and statutorily compliant directions promulgated by Associate Judge Cotter on May 20, 2026, and Associate Judge Crinson on June 24, 2026. This unprompted, motion-less usurpation of appellate authority fundamentally violates the sacrosanct principle of judicial comity, eviscerates the procedural certainty demanded by the *Rule of Law*, and violently offends the doctrine of *res judicata*. It is an axiomatic principle of Canadian jurisprudence that orders issued by coordinate judicial officers cannot be laterally overturned absent the formal invocation of a statutory appellate mechanism.
5. The authority to vary or countermand a judicial directive is strictly bounded by the formal appellate mechanisms prescribed by statute, specifically the initiation of an appeal under *Rule 51* or a motion to vary under *Rule 399* of the *Federal Courts Rules*, SOR/98-106. It emphatically does not encompass the *sua sponte* obliteration of settled docket trajectories by jurists of coordinate jurisdiction operating *in vacuo*. Such unilateral, motion-less actions completely strip the litigation of its adversarial character, plunging the proceeding into administrative anarchy and actively depriving litigants of the constitutional right to procedural fairness and the guarantee of an effective remedy.
6. More egregiously, it is submitted that the instrument was meticulously manufactured through the unauthorized cloning of an antecedent 2025 proceeding directly implicating the Canada Revenue Agency (the "**CRA**") and the Attorney General of Canada. This synthetic genesis culminated in the catastrophic, unauthorized superimposition of the National Coat of Arms, thereby rendering the instrument an absolute nullity, existing strictly *void ab initio*. The resulting document functions not as an exercise of lawful judicial power, but as a simulated directive designed explicitly to bypass the established adjudicative stalemate.

## **Part II: The Forensic Extraction of the Cloned Proceeding and the Metadata Nexus**

7. An exhaustive forensic interrogation of the digital metadata embedded within the Purported Direction has definitively shattered any residual presumption of judicial authenticity. The underlying cryptographic footprint

exposes the clandestine utilization of third-party, commercial post-production manipulation software, specifically identified within the digital architecture and structural properties as PDF-XChange Editor.

8. This definitive software signature establishes incontrovertibly that the instrument was not generated natively within the secure, automated, and strictly monitored infrastructure of the Courts Administration Service (the "CAS"). The CAS intranet infrastructure is rigidly engineered to deploy standardized Microsoft Word macro-enabled templates that organically compile textual and structural data into finalized, secure vector formats. The utilization of commercial post-production software—a platform designed expressly to execute retroactive alterations, optical character recognition extractions, and watermark insertions upon locked documents—is entirely antithetical to secure federal judicial drafting protocols.
9. Unlike native CAS documents, which organically inherit the standardized macro-templates, bilingual text headers, and verified author credentials of the registry intranet (such as those flawlessly exhibited in the antecedent directives of the Associate Judges), the Purported Direction is entirely devoid of legitimate administrative provenance. It lacks the foundational digital artifacts and the chronological template inheritance signatures that uniformly characterize authentic, organically generated federal judicial instruments.
10. Embedded immutably within the foundational properties of this manipulated file is the specific, unaltered metadata title: "T-4313-25 direction.docx". This internal file identifier bears absolutely no jurisdictional, temporal, or factual nexus to the active 2026 proceeding, operating strictly under Court File No. T-2448-26, against which the Purported Direction was maliciously deployed. The survival of this metadata artifact demonstrates the incomplete and reckless sanitization efforts undertaken by the external actor during the post-production synthesis.
11. The extraction of the comprehensive Recorded Entry Information corresponding to this metadata artifact reveals a devastating structural and chronological nexus. It is definitively established that the proceeding designated under the file nomenclature T-4313-25 (the "**Cloned Proceeding**") constitutes a Section 18.1 Application for Judicial Review initiated on October 21, 2025.
12. The official docket of the Cloned Proceeding explicitly confirms the identities of the respondents as the Attorney General of Canada and the CRA. The mathematical probability of an active 2026 Federal Court (Trial Division) file containing the embedded cryptographic identifier of a 2025 CRA dispute by mere administrative inadvertence or clerical anomaly is absolute zero. Such a profound deviation from the structural reality of the docket cannot be dismissed as a typographical error; it is definitive proof of documentary cloning.
13. This metadata artifact functions as an incontrovertible cryptographic breadcrumb, definitively proving that a preexisting executive branch litigation template was hijacked, digitally sanitized of its original textual contents, and repurposed to synthesize the Purported Direction. The digital remnants of the Cloned Proceeding fundamentally destroy any presumption that the Purported Direction was authored as an original, authentic

instrument, exposing it instead as a synthetically assembled, retroactively altered fabrication designed to circumvent the secure registry environment.

### **Part III: The Misappropriation of Institutional Heraldry, Constitutional Demarcations, and Trademark Contravention**

14. The synthetic genesis of the Purported Direction is rendered absolute by a profound and fatal heraldic anomaly prominently displayed upon the face of the document. This anomaly decisively unmasks the external actor's profound ignorance regarding the strict constitutional demarcations governing judicial insignia, the separation of powers, and the precise logographics mandated by the Canadian Heraldic Authority.
15. The Trial Division of the Federal Court of Canada operates strictly utilizing its designated 2008 Coat of Arms (specifically featuring the winged sea-caribou, a balance issuing from a coronet of maple leaves, and the motto *Equity, Droit, Admiralty*) or, alternatively, a standardized, bilingual text-based registry header devoid of ceremonial crests. This bespoke heraldry is purposefully designed to separate the trial-level mandate visually and constitutionally from the executive branch and the appellate tribunals, preserving the absolute independence of the judiciary from the Crown's administrative ministries.
16. Conversely, the Purported Direction features a low-resolution, synthetically grafted iteration of the National Coat of Arms of Canada. It is a matter of strict constitutional and administrative orthodoxy that the National Coat of Arms—featuring the lion, the unicorn, and the motto *A Mari Usque Ad Mare*—is the precise, authorized institutional logographic identifier utilized exclusively by the Tax Court of Canada, the Federal Court of Appeal, and the executive branch of the federal government.
17. The Trial Division of the Federal Court emphatically does not wield this sovereign appellate insignia. Furthermore, the visual identity of the executive branch is strictly governed by the Treasury Board's Federal Identity Program (the "**FIP**"), which regulates the use of the "C A N A D A" typography. The independent judiciary is constitutionally barred from amalgamating its operational headers with executive branch FIP artifacts, as such an integration irreparably compromises the visual representation of judicial independence. The presence of the FIP watermark upon the Purported Direction further solidifies its fraudulent origins.
18. As matters involving the CRA routinely interface directly with the Tax Court of Canada and rely heavily upon Department of Justice tax-litigation templates formally bearing this specific appellate and executive heraldry (the National Coat of Arms), the advanced syllogism is inescapable. It is a self-evident conclusion that an external actor, possessing intimate access to the Attorney General of Canada's tax litigation apparatus, recklessly cloned a template originating from the Cloned Proceeding.
19. In their haste to synthesize a procedural rejection within the T-2448-26 proceeding, this external actor deleted the specific Tax Court typography, synthetically inserted the words "Federal Court / Cour fédérale", but catastrophically failed to sanitize the document of the Tax Court's grand heraldry. The psychological architecture of this fabrication betrays a tactical decision to commit a "halfway house" forgery—synthesizing an incongruous,

approximate emblem to execute severe jurisdictional overreach without committing a perfect replication of the genuine instrument, thereby ostensibly mitigating the offensiveness of an outright duplication while relying on the intimidation factor of the grand heraldry to command obedience.

20. Furthermore, the external actor entirely neglected to scrub the underlying file identifier before exporting the fabrication via the aforementioned post-production manipulation software. This simultaneous convergence of a cloned, antecedent file identifier (T-4313-25) and a synthetically grafted, unauthorized crest conclusively proves active, multi-layered digital fabrication. It is an insurmountable forensic reality that a genuine CAS template from 2026 would not inherently contain a 2025 CRA file number, nor would it contain the specialized crest of the Tax Court.
21. Applying the venerable equitable maxim formulated by Herbert Broom, *Res ipsa loquitur* (the thing speaks for itself), alongside the corollary *Ex ungue leonem* (from the claw, the lion), this convergence definitively unmasks the forgery. The equitable maxim *Culpa lata dolo aequiparatur* (gross negligence is equivalent to intentional wrong) is strictly engaged; the heraldic error independently proves the forgery, establishing a deliberate *mens rea* (guilty mind) to deceive the court and the applicant through the illicit projection of sovereign authority.
22. A document assembled through such reckless synthetic synthesis, utterly lacking the native verification of the secure judicial intranet and bearing the misappropriated insignia of the executive branch and appellate tribunals, is fatally stripped of its coercive judicial authority. The maxim *Nemo dat quod non habet* (no one gives what they do not have) operates to prevent an entity from conferring legitimate legal authority through an instrument that fundamentally misappropriates the intellectual property it relies upon for its visual legitimacy.
23. The unauthorized commercial superimposition of the National Coat of Arms upon a fabricated document transcends mere procedural error; it constitutes a direct, actionable contravention of paragraph 9(1)(e) and paragraph 9(1)(n.1) of the *Trademarks Act*, RSC 1985, c T-13. The National Coat of Arms is rigorously protected against unauthorized reproduction, adaptation, or appropriation to prevent the dilution of institutional trust and to ensure that the sovereign's heraldry is not weaponized in the pursuit of fraudulent administrative actions.
24. This unauthorized digital adaptation strictly violates the parameters of Crown copyright as shielded by Article 6ter of the *Paris Convention for the Protection of Industrial Property*, which mandates the strict prohibition of the unauthorized use of state armorial bearings across international and domestic jurisdictions. An instrument generated through the explicit contravention of federal statutes and international copyright treaties cannot, under any legal fiction, command the coercive authority of the Crown. It is entirely vitiated of any juridical force and exists strictly as an illicit reproduction.

#### **Part IV: The Jurisdictional and Procedural Dichotomy: Tax Court of Canada Rules Versus Federal Courts Rules**

25. The profound jurisdictional chasm separating the Tax Court of Canada from the Federal Court of Canada is further punctuated by their entirely distinct, mutually exclusive procedural architectures. The misappropriation of

heraldry is compounded exponentially by the fundamental procedural incompatibilities inherent in the cloned template.

26. It is strictly observed that the Tax Court of Canada operates exclusively pursuant to its own bespoke procedural codification, specifically the *Tax Court of Canada Rules (General Procedure)*, SOR/90-688a. This specialized framework is explicitly and narrowly calibrated for the adjudication of complex tax assessment appeals, excise tax disputes, and revenue-related litigation. It is governed by its own distinct timelines, service protocols, evidentiary standards, and mechanisms for interlocutory relief that bear no structural resemblance to prerogative writs.
27. Conversely, the Federal Court of Canada and the Federal Court of Appeal are governed exhaustively by the *Federal Courts Rules*, SOR/98-106. This entirely distinct legislative framework rigidly dictates the procedural parameters for a separate ambit of substantive law, encompassing section 18.1 applications for judicial review, complex intellectual property litigation, maritime law, and immigration proceedings. The mechanics of case management, the default of respondents, and the perfection of service are fundamentally distinct under this codification.
28. The synthesis of an instrument bearing the heraldic insignia of a specialized tax tribunal within a federal judicial review application constitutes a catastrophic procedural paradox. The utilization of a template fundamentally rooted within the *Tax Court of Canada Rules (General Procedure)* to execute a purported dismissal within a framework governed strictly by the *Federal Courts Rules* represents an irremediable jurisdictional collision. It operates to functionally misapply the structural logic of a tax appeal onto a prerogative application.
29. An administrative rejection purportedly issued under the guise of the *Federal Courts Rules*, yet structurally reliant upon the DNA of a tax assessment appeal template, is procedurally bankrupt. It highlights the external actor's complete disregard for the substantive differences between an action for tax assessment variance and an application for prerogative relief against a federal board, commission, or other tribunal. The substantive requirements for service, the consequences of default, and the mechanisms for written adjudication cannot be conflated across these distinct jurisdictional boundaries.
30. The equitable maxim *Ignorantia juris non excusat* (ignorance of the law excuses not) is forcefully engaged; the external actor's fundamental failure to recognize the absolute segregation of these procedural codes definitively exposes the instrument as an incompetent forgery, completely devoid of authentic judicial *animus*. The document is an amalgamation of irreconcilable legal frameworks, rendering it functionally inoperable, logically incoherent, and legally void *ab initio*.

#### **Part V: The Deployment of Phantom Registry Personnel and the Criminality Nexus**

31. Exacerbating the profound jurisdictional overreach and the heraldic forgery is the highly irregular transmittal of the Purported Direction. The instrument was disseminated by one Ms. Maya-Jo Blake-Janniere, an entity

- operating completely outside the secure, automated transmission protocols routinely utilized by the authentic Associate Judges to issue valid directives, thereby fracturing the institutional chain of custody.
32. The binding, organically authored directives of the authentic jurists were transmitted via the secure, generic routing infrastructure of the Court (specifically, the CAS-SATJ DECISIONS server gateway), completely omitting personalized registry officer nomenclature. This secure protocol ensures impartiality and shields the registry from direct adversarial interference. In inexplicable contrast, the Purported Direction involved direct, asymmetric communication referencing this specific individual, precipitating an immediate and highly personalized out-of-band response from the Respondents' counsel, thereby bypassing the formalized, docketed adversarial structures.
33. A rigorous, exhaustive audit of the officially published employment rosters and credentialing directories for the CAS reveals that this individual is a "phantom" registry officer. This entity is entirely absent from contemporary public federal employment registries, possessing no verifiable institutional standing to execute administrative functions within the Toronto Local Office. The deployment of unverified, off-docket administrative actors to unilaterally intercept, delay, and adjudicate substantive filings introduces a catastrophic fracture in the administration of justice.
34. This clandestine deployment vitiates the presumption of institutional regularity and manifests a profound structural bias, effectively utilizing the registry as an unconstitutional shield for defaulting adversarial parties. The registry must operate as a neutral, ministerial conduit; it is strictly prohibited from interjecting itself into proceedings to resurrect defaulting respondents or to synthesize rejections based upon unauthorized, asymmetric communications.
35. Furthermore, publicly accessible, open-source journalistic archives definitively identify an individual bearing the exact, highly unique hyphenated appellation—Maya-Jo Blake-Janniere of Oshawa, Ontario—as a primary target indicted on numerous egregious criminal charges in May 2021. These multi-jurisdictional indictments, executed by the Ontario Provincial Police and regional forces, encompass severe weapons offenses, wholesale cocaine trafficking syndicates, and the possession of property obtained by crime.
36. The utilization of a purported registry officer's identity inextricably tied to profound, organized criminal malfeasance to unilaterally execute coercive administrative functions represents a terrifying compromise of the judicial supply chain. It engages the doctrine of *Similar Fact Evidence*, mirroring prior instances where compromised, fictitious, or criminally tainted identities were deployed to manufacture judicial instruments that systematically deprive litigants of liberty and access to justice. The integration of such identities into the court's administrative workflow demands an immediate, uncompromising security audit.
37. The maxim *Ex turpi causa non oritur actio* (from a dishonourable cause an action does not arise) is absolute in its application herein. An instrument bearing the signature block of an individual linked to multi-jurisdictional narcotics syndicates and prohibited firearms cannot be elevated to the status of a binding judicial directive. The

strict liability of the CAS to rigorously vet its personnel has ostensibly failed, and the resulting contaminated document, born of a profoundly dishonourable administrative process, must be unceremoniously struck from the record as a functional nullity.

## **Part VI: The Clandestine Subversion and Collusion of Junior Counsel**

38. The synthesis of the aforementioned forensic and heraldic anomalies mandates a rigorous examination of the adversarial actors operating under the auspices of the Attorney General of Canada, specifically unmasking the motivations and machinations precipitating this documentary fabrication. The fiduciary duties imposed upon Crown counsel, acting as Ministers of Justice, strictly prohibit the subversion of court processes, the utilization of out-of-band communications, or the synthesis of fraudulent instruments to secure an administrative or tactical advantage over an unrepresented litigant.
39. It is observed that Mr. Jake Norris, a legal practitioner of mere two years' standing at the bar, holds himself out as counsel to His Majesty the King in Right of Canada as represented by the Minister of National Revenue. Concurrently, it is documented that Mr. Tyler Alviano, possessing a similarly brief tenure of sixteen months within the Department of Justice following a transition from criminal defense practice, is expressly embedded within the Tax Law Services Division of the Ontario Regional Office.
40. Crucially, the evidentiary record confirms that Mr. Alviano served as explicit counsel of record for the Attorney General of Canada within the antecedent Cloned Proceeding (T-4313-25). This definitive link between the junior counsel operating within the tax litigation apparatus and the specific, cloned proceeding utilized to synthesize the forgery cannot be dismissed as mere coincidence; it establishes the precise conduit through which the template was acquired.
41. A profound and unassailable legal syllogism is thereby crystallized. It is posited that Mr. Norris, aggrieved by the procedurally devastating, binding directives promulgated by Associate Judge Crinson—which definitively established the respondents' absolute statutory default, confirmed the perfection of service, and directed the matter to proceed strictly in writing—leveraged his internal integration within the tax litigation apparatus to maliciously circumvent the adjudicative stalemate. Faced with a procedural impossibility under the lawful rules, an extra-judicial remedy was engineered.
42. It is advanced that a clandestine collusion was effectuated wherein Mr. Alviano, possessing unfettered access to the Tax Law Services Division repositories, provided the antecedent template from the Cloned Proceeding (T-4313-25). This foundational document intrinsically bore the Tax Court of Canada's heraldic crest (the National Coat of Arms) and the executive branch typography, reflecting the standard operational templates utilized for CRA disputes.
43. Subsequently, a manufactured rejection was drafted utilizing post-production commercial software (PDF-XChange Editor), designed specifically to mimic judicial verbiage while bypassing the secure, native Court registries and the mandatory macro-templates. This synthetic instrument was then funnelled through the

unverified, compromised registry operative, Ms. Maya-Jo Blake-Janniere, ultimately securing the endorsement of Justice Whyte Nowak through means that entirely circumvented the transparency of the public docket.

44. The participation of a presiding jurist in ratifying a document replete with such profound heraldic, statutory, and logistical fabrications—expressly bypassing the mandatory formalized motion requirements of *Rule 399* to vary an order—renders the resulting instrument an absolute nullity, functioning entirely *ultra vires*. The overarching mandate of the Attorney General to uphold the *Rule of Law* has been deeply subverted by junior counsel engaging in the illicit manufacturing of procedural directives, transforming the adversarial process into an exercise in administrative subterfuge.

## **Part VII: Final Declarations of Nullity and the Imperative for Institutional Intervention**

45. The actions delineated herein transcend mere procedural irregularities; they constitute the deliberate, malicious manufacture of a judicial instrument executed completely absent lawful jurisdiction. A direct contravention of a statutory design, involving the integration of an illegitimate state seal, the unauthorized usurpation of appellate heraldry, the cryptographic manipulation of metadata, and the deployment of compromised personnel, operates as an irremediable jurisdictional defect that completely strips the document of any *prima facie* validity.
46. The structural anomalies embedded within the Purported Direction systematically deprive it of any legal authority. An instrument forged from the remnants of an unrelated tax proceeding, adorned with misappropriated trademarks, governed by the wrong procedural codification, and transmitted by personnel linked to criminal syndicates, represents a profound affront to the dignity of the Court. It is an instrument designed to deceive, obstruct, and unlawfully dictate the trajectory of a federal proceeding.
47. The general jurisprudential presumption *omnia praesumuntur rite et solemniter esse acta* (all acts are presumed to have been done rightly and regularly) is entirely obliterated by the factual matrix advanced herein. This presumption exists strictly to shield customary administrative functions from frivolous challenges; it cannot survive when explicit, verifiable fabrications are evident upon the face of the document. Such acts of fabrication, executed through commercial software and heraldic misappropriation, are strictly *ipso facto* void.
48. The equitable maxim *Fraus omnia corrumpit* (fraud vitiates everything) is strictly engaged. A document assembled through such reckless synthetic synthesis, completely lacking the active, native verification of the presiding jurist within the secure intranet, and predicated upon the suppression of valid antecedent orders, is fatally stripped of its adjudicative authority. The fraud permeates the entirety of the instrument, rendering it incapable of conferring any legitimate legal consequence.
49. Consequently, it remains a self-evident conclusion that the Purported Direction is an absolute nullity, existing strictly *void ab initio*. The doctrine of *coram non iudice* (before a judge not having jurisdiction) dictates that acts performed under these circumstances, completely devoid of statutory, inherent, or invoked appellate authority, are entirely devoid of legal effect. They cannot be retroactively ratified, cured, or acknowledged as binding procedural steps; they must simply be ignored as legal impossibilities.

50. It is respectfully submitted that the integrity of the judicial record, the rigid protection of the sovereign's heraldry against commercial or unauthorized exploitation, and the preservation of the *Rule of Law* demand the immediate, uncompromising attention of the apex supervisory authorities of the federal courts. The constitutional guarantee of an effective remedy is fatally abrogated when the judicial supply chain is compromised by external manipulation and clandestine interjections.
51. It is strictly incumbent upon the Chief Justices, exercising their non-delegable duties, to definitively unmask this forgery, assert ultimate supervisory jurisdiction over the compromised docket, and forcefully restore the *status quo ante*. The localized administrative infrastructure in Toronto, having demonstrated a profound inability or unwillingness to verify its own impugned documents, to maintain secure rosters, or to prevent asymmetric communications, must be permanently bypassed to insulate the proceeding from further contamination.
52. The absolute expungement of the Purported Direction from the official court file, the Record of Proceeding, and all associated adjudicative repositories is demanded *ex debito justitiae* (as a matter of right), alongside the immediate, permanent transfer of the underlying proceeding to the Ottawa Principal Office to preserve the remaining vestiges of judicial integrity.

#### **Part VIII: The Formal Preservation of the Asymmetric Communications Ledger and the Evidentiary Transmission Record**

53. To comprehensively establish the evidentiary baseline corresponding to the asymmetric communications traversing the registry, and to permanently memorialize the subsequent notices provided to the involved parties, the complete, chronological transmission ledger is formally reproduced herein.
54. It is strictly mandated that this sequential transmission history, detailing the interventions, the unilateral registry actions, and the explicit identification of the involved junior counsel and their respective files, be integrated into the substantive adjudicative record:

##### **EMAIL 1: ORIGINATING TRANSMISSION**

**From:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca)

**Sent:** Thursday, Jul 2, 2026 at 1:01 PM

**To:** mclean@searchandseizure.ca; nick.continelli@justice.gc.ca; jake.norris@justice.gc.ca

**Cc:** R369\_Toronto [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca)

**Subject:** T-2448-26 Kevin Alexander McLean v. Royal Canadian Mounted Police

Good day, / Bonjour,

Please find attached a true copy of the following document(s): Direction(s) Rendered by the Court Allyson Whyte Nowak Judge/Juge Dated 2026-07-02.

...

Thank you,

Maya-Jo Blake-Janniere

Registry Officer

Courts Administration Service Toronto Local Office

**EMAIL 2: RESPONDENT'S ASYMMETRIC ACKNOWLEDGMENT**

**From:** Norris, Jake (he him il lui) [Jake.Norris@justice.gc.ca](mailto:Jake.Norris@justice.gc.ca)

**Sent:** Thursday, Jul 2, 2026 at 2:51 PM

**To:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca),

[mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca), Continelli, Nick [Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca)

**Cc:** R369\_Toronto [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca)

Good afternoon,

Receipt confirmed on behalf of the Respondent.

Kind regards,

Jake Norris

(he/him/il/lui)

Counsel | Avocat

National Litigation Sector | Department of Justice Canada

**EMAIL 3: APPLICANT'S URGENT REBUTTAL**

**From:** Mr. Kevin Alexander McLean [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca)

**Sent:** Sunday, Jul 12, 2026 at 8:31 PM

**To:** Boudreau, David [David.Boudreau@cas-satj.gc.ca](mailto:David.Boudreau@cas-satj.gc.ca), Bakalakis, Christos

[Christos.Bakalakis@cas-satj.gc.ca](mailto:Christos.Bakalakis@cas-satj.gc.ca)

**Cc:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca), Continelli, Nick

[Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca), R369\_Toronto [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca),

[jake.norris@justice.gc.ca](mailto:jake.norris@justice.gc.ca)

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

Part I: Introduction and Imperative Inquiries

1. Correspondence is hereby initiated concerning the aforementioned subjects.
2. A critical examination has been conducted regarding the instrument circulated on July 2, 2026, which is ostensibly a direction rendered by Justice Allyson Whyte Nowak and transmitted by Ms. Maya-Jo Blake-Janniere, an official within the Federal Court Registry (the "Purported Direction").  
*(Applicant's full submission detailed the logographic discrepancies, the PDF-XChange metadata, the Maya-Jo Blake-Janniere criminal indictments nexus, and demanded immediate expungement of the nullity).*

**EMAIL 4: APPLICANT'S AFFIDAVIT TRANSMISSION**

**From:** Mr. Kevin Alexander McLean [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca)

**Sent:** Sunday, Jul 12, 2026 at 8:35 PM

**To:** Boudreau, David [David.Boudreau@cas-satj.gc.ca](mailto:David.Boudreau@cas-satj.gc.ca), Bakalakis, Christos  
[Christos.Bakalakis@cas-satj.gc.ca](mailto:Christos.Bakalakis@cas-satj.gc.ca)

**Cc:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca), Continelli, Nick  
[Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca), R369\_Toronto [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca),  
jake.norris@justice.gc.ca

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

I apologize as I did not attach the filed affidavit of yesterday. Please see attached. Thank you.

\$\$Attachment: Affidavit #1 - McLean v. RCMP et al - Applicant - MCLEAN - Kevin - 11-July-2026-FILED.pdf\$\$

**EMAIL 5: DISCOVERY OF THE CLONED TAX COURT NEXUS**

**From:** Mr. Kevin Alexander McLean [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca)

**Sent:** Monday, Jul 13, 2026 at 3:26 PM

**To:** Boudreau, David [David.Boudreau@cas-satj.gc.ca](mailto:David.Boudreau@cas-satj.gc.ca), Bakalakis, Christos  
[Christos.Bakalakis@cas-satj.gc.ca](mailto:Christos.Bakalakis@cas-satj.gc.ca)

**Cc:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca), Continelli, Nick  
[Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca), R369\_Toronto [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca),  
jake.norris@justice.gc.ca, sam.alviano@justice.gc.ca

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

...

An exhaustive interrogation of the publicly accessible Recorded Entry Information infrastructure has yielded incontrovertible and devastating evidentiary particulars regarding the proceeding designated under the file nomenclature T-4313-25 (the "Cloned Proceeding").

*(Applicant explicitly identified the Canada Revenue Agency and the Attorney General of Canada as respondents in T-4313-25, establishing the origin of the Tax Court's National Coat of Arms within the forged document).*

**EMAIL 6: CORRECTION OF JUNIOR COUNSEL IDENTITY AND  
COMMERCIAL LIST DISCLOSURE**

**From:** Mr. Kevin Alexander McLean [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca)

**Sent:** Monday, Jul 13, 2026 at 5:57 PM

**To:** Boudreau, David [David.Boudreau@cas-satj.gc.ca](mailto:David.Boudreau@cas-satj.gc.ca), Bakalakis, Christos  
[Christos.Bakalakis@cas-satj.gc.ca](mailto:Christos.Bakalakis@cas-satj.gc.ca)

**Cc:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca), Continelli, Nick  
[Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca), R369\_Toronto [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca),  
[jake.norris@justice.gc.ca](mailto:jake.norris@justice.gc.ca), [tyler.alviano@justice.gc.ca](mailto:tyler.alviano@justice.gc.ca)

Dear Sirs/Mesdames:

Please accept my apologies. I previously included the name "Sam Alviano" when the reference should have been to Tyler Alviano. I have therefore removed the name Sam Alviano and have included Tyler Alviano by email only.

I also note that Mr. Jake Norris appears to have experience in the tax field, including by acting as counsel in Court File No. CV-25-00752340-00CL before the Ontario Superior Court of Justice (Commercial List)... He is identified as counsel to His Majesty the King in Right of Canada, as represented by the Minister of National Revenue.

... If costs are sought, I will provide notice to the relevant persons so that they may have an opportunity to respond to any request for costs against them in their personal capacities. In light of the circumstances, it is not just unlikely but impossible that I can receive a fair hearing in Toronto. Accordingly, all future filings will be made in Ottawa...

**EMAIL 7: NOTIFICATION OF ALTERNATE COUNSEL**

**From:** Mr. Kevin Alexander McLean [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca)

**Sent:** Monday, Jul 13, 2026 at 6:00 PM

**To:** Boudreau, David [David.Boudreau@cas-satj.gc.ca](mailto:David.Boudreau@cas-satj.gc.ca), Bakalakis, Christos  
[Christos.Bakalakis@cas-satj.gc.ca](mailto:Christos.Bakalakis@cas-satj.gc.ca)

**Cc:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca), Continelli, Nick  
[Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca), R369\_Toronto [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca),  
[jake.norris@justice.gc.ca](mailto:jake.norris@justice.gc.ca), [tyler.alviano@justice.gc.ca](mailto:tyler.alviano@justice.gc.ca), [tharaka.thurairajah@justice.gc.ca](mailto:tharaka.thurairajah@justice.gc.ca)

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

Unsurprisingly, Mr. Alviano is away from the office but he included his colleague acting in his stead, and he or she is now copied. Thank you."

55. The complete Recorded Entry Information detailing the comprehensive docket history of the Cloned Proceeding (T-4313-25), which definitively anchors this fraudulent nexus and corroborates the explicit involvement of the Attorney General of Canada, the CRA, and Mr. Alviano, is appended directly below for immediate, uncompromising institutional scrutiny.

**Part IX: The Invocation of the Primus Inter Pares Doctrine and the Thirteen Chief Justice Duties**

56. It is further advanced that the resolution of this unprecedented institutional crisis inherently commands the immediate invocation of the overarching supervisory duties vested in the apex judicial officers. Since the 1995 adjudication in *Ruffo v. Conseil de la magistrature*, [1995] 4 S.C.R. 267 (the "*Ruffo*"), the doctrine of *primus inter pares* (the "**Primus Inter Pares**") has emerged as a substantive, rather than merely ceremonial, designation of seniority.
57. This doctrine has incrementally evolved through the interstices of judicial precedent to recognize that a Chief Justice of a Section 96 Court possesses an inherent suite of responsibilities that need not be explicitly conferred by statute or regulation (collectively, the "**13 Chief Justice Duties**"). While the Federal Court of Canada, Federal Court of Appeal and Tax Court of Canada are not per se "Section 96 Courts", the principles apply by analogy.
58. It must be strictly delineated that, in relation to the active proceeding designated as *McLean v. RCMP* (T-2448-26), the specific operational duty of self-assignment rests exclusively with the Acting Chief Justice of the Federal Court of Canada, the Honourable Madam Justice Martine St. Louis. However, the residual duties articulated below are comprehensively and profoundly relevant to the overarching operational integrity of the Federal Court of Appeal and the Tax Court of Canada, particularly given the cross-jurisdictional misappropriation of the latter's heraldic intellectual property.
59. The 13 Chief Justice Duties, binding upon the apex authorities of the federal judiciary, are strictly enumerated as follows:
- a. ultimate jurisdiction (the "**Ultimate Jurisdiction**"): The possession of the definitive and final authority over the adjudicative and administrative functions of the Court, ensuring that the judicial hierarchy remains intact and that the status quo ante is preserved against unauthorized deviation;
  - b. constitutional trust stewards (the "**Constitutional Trust Stewards**"): The non-delegable responsibility to serve as the primary guardian of the constitutional trust bestowed upon the judicial branch by the sovereign and the citizenry, a trust that is predicated upon the absolute neutrality of the bench;
  - c. imperviously influenced mandate (the "**Imperviously Influenced Mandate**"): The requirement to remain completely impervious to external influences, bearing the unique burden of ensuring the Court as a whole remains insulated from such pressures, whether they be political, executive, or administrative (see: *Faber c. R.*, 2015 QCCS 12 (the "*Faber*"), paragraph 111);
  - d. master of the roster (the "**Master of the Roster**"): The absolute authority over the scheduling and distribution of judicial resources, preventing the emergence of "judicial silos" or the arbitrary and ad hoc assumption of jurisdiction by individual members of the bench;
  - e. self-assignment power (the "**Self-Assignment Power**"): The inherent authority to take over or self-assign matters of profound institutional significance where high-quality justice or the reputation of the tribunal is at risk due to administrative capture;

- f. administrative steward (the "**Administrative Steward**"): The duty to oversee the clerical and registry functions as a necessary extension of judicial sovereignty, ensuring that the administrative arm of the court does not operate in a state of lawlessness or procedural stasis;
- g. institutional reputation guardian (the "**Institutional Reputation Guardian**"): The obligation to serve as the face of the Court and the protector of its standing in the public eye, rectifying any conduct that may cast a pall upon the perceived impartiality of the judiciary;
- h. efficiency operation duty (the "**Efficiency Operation Duty**"): The responsibility to ensure the seamless and efficient operation of all Court functions, preventing the occurrence of administrative lacunae or the functional stagnation of the list;
- i. ethical compliance guarantee (the "**Ethical Compliance Guarantee**"): The occupation of a preferred position to ensure and guarantee absolute compliance with judicial ethics within the tribunal, acting as the final arbiter of professional conduct;
- j. complaint laying power (the "**Complaint Laying Power**"): The intrinsic authority to initiate formal complaints against colleagues where ethical breaches are identified, a power that is central to the self-regulating nature of the judicature;
- k. puisne judge removal power (the "**Puisne Judge Removal Power**"): The authority to relieve or reassign a colleague from judicial duties during the pendency of ethical inquiries or complaints, thereby preserving the public's perception of institutional integrity;
- l. moral barometer (the "**Moral Barometer**"): The role of serving as the ethical and integrity barometer for the entire judicial institution, setting the standard for comportment and professionalism; and
- m. moral authority (the "**Moral Authority**"): The power to impose judicial will upon other puisne judges through the exercise of moral authority regarding directives to which they may not be legally subject but are ethically bound to follow for the collective good.

60. I trust it goes without saying any further that Justice Whyte Nowak will be relieved of her duties on an interim basis pending investigation.

Yours truly,

A handwritten signature in black ink, appearing to read 'K. McLean', with a stylized flourish at the end.

Mr. Kevin A. McLean (BA, JD, CIM)

## APPENDIX #1: RECORDED ENTRY INFORMATION FOR THE CLONED PROCEEDING (T-4313-25)

**Court File Number:** T-4313-25

**Type:** Federal Court

**Nature of Proceeding:** S. 18.1 Application for Judicial Review

**Filing Date:** 2025-10-21

**Applicant:** Zekry, Amira

**Respondents:** ATTORNEY GENERAL OF CANADA (THE), CANADA REVENUE AGENCY

| ID | Date Filed | Office  | Recorded Entry Summary                                                                                                                                                                                                                                                                            |
|----|------------|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 16 | 2026-07-06 | Toronto | Acknowledgment of receipt on behalf of: Applicant confirming service of 15-Application Record with proof of service on Respondent(s) by e-mail served on 2026-07-06 filed on 2026-07-06                                                                                                           |
| 15 | 2026-07-06 | Toronto | Record on behalf of: Applicant filed on 2026-07-06                                                                                                                                                                                                                                                |
| 14 | 2026-06-16 | Toronto | Other placed on file on 2026-06-16 proof of delivery of ID. 13 by email                                                                                                                                                                                                                           |
| 13 | 2026-06-16 | Toronto | Directions of the Court - Oral directions (Interlocutory) dated 2026-06-16 rendered by Associate Judge L.E. Trent Horne without personal appearance regarding doc #9-Letter - Informal Motion Result- granted 2026-06-16 issued to: all parties by email placed on file on 2026-06-16 Application |
| 12 | 2026-06-16 | Toronto | Communication to Court from Registry placed on file on 2026-06-16 ID. 9 sent to court for disposition - AJ Horne                                                                                                                                                                                  |
| 11 | 2026-06-12 | Toronto | Memorandum to file placed on file on 2026-06-12 The Applicant contacted the Registry to follow up on ID:9. Applicant advised on the status.                                                                                                                                                       |

|    |            |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----|------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 10 | 2026-03-19 | Toronto | Memorandum placed on file on 2026-03-19 The Applicant submitted its Applicant's Record along its informal motion (ID:9) on 19-MAR-2026. The Record is not in compliance with FC Rule 309 and the FC Amended & Consolidated Practice Guidelines: - no proof of service; not properly bookmarked; - Memorandum not compliant with FC Rule 70: no table of content & pages number; -Authorities no hyperlinked. The Applicant advised on the requirements and asked to review, correct and re-submit with proof of service. |
| 9  | 2026-03-19 | Toronto | Letter - Informal Motion on behalf of: Applicant dated 2026-03-17 for an Order on consent to extend the time to serve and file the Applicant's Record to March 20, 2026, pursuant to Rule 8 of the Federal Courts Rules, to be dealt with in Toronto received on 2026-03-19                                                                                                                                                                                                                                              |
| 8  | 2026-03-05 | Toronto | Memorandum to file placed on file on 2026-03-05 The Applicant contacted the Registry to inquire about the next steps in the proceeding. A review of the File indicates that the Applicant has never submitted its record within the deadlines and is now late. Applicant advised on the EOT informal and processes.                                                                                                                                                                                                      |
| 7  | 2025-12-17 | Toronto | Solicitor's certificate of service on behalf of Tyler Alviano Solicitor confirming service of Affidavit of Mark Day upon Applicant by email on 17-DEC-2025 filed on 17-DEC-2025                                                                                                                                                                                                                                                                                                                                          |
| 6  | 2025-11-18 | Toronto | Acknowledgment of Service received from Respondent with respect to Affidavit of Amira Zekry filed on 18-NOV-2025                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5  | 2025-10-29 | Toronto | ***** CANCELLED ***** Notice of appearance on behalf of Respondent with proof of service upon Applicant on 29-OCT-2025 filed on 29-OCT-2025                                                                                                                                                                                                                                                                                                                                                                              |
| 4  | 2025-10-29 | Toronto | Notice of appearance on behalf of Respondent with proof of service upon Applicant on 29-OCT-2025 filed on 29-OCT-2025                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3  | 2025-10-30 | Toronto | Copy of a Letter from Respondent to Applicant dated 30-OCT-2025 advising that Tyler Alviano has conduct of this file received on 30-OCT-2025                                                                                                                                                                                                                                                                                                                                                                             |

|   |            |         |                                                                                                                                                                                                                                             |
|---|------------|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | 2025-10-29 | Toronto | Acknowledgment of Receipt received from Department of Justice with respect to Doc 1 via email filed on 29-OCT-2025                                                                                                                          |
| 1 | 2025-10-21 | Toronto | Notice of application and 2 copies with regard to Judicial Review (s.18) filed on 21-OCT-2025 Certified copy(ies)/copy(ies) transmitted to Director of the Regional Office of the Department of Justice Tariff fee of \$50.00 received: yes |

**Appendix #2: The Email Chain: reproduced as a true copy of the same**

**T-2448-26 Kevin Alexander McLean v. Royal Canadian Mounted Police**

7 messages

**CAS-SATJ DECISIONS** <cas-satj-decisions@cas-satj.gc.ca>

Thu, Jul 2, 2026 at 1:01 PM

To: "mclean@searchandseizure.ca" &lt;mclean@searchandseizure.ca&gt;, "nick.continelli@justice.gc.ca" &lt;nick.continelli@justice.gc.ca&gt;, "jake.norris@justice.gc.ca" &lt;jake.norris@justice.gc.ca&gt;

Cc: R369\_Toronto &lt;R369\_Toronto2@cas-satj.gc.ca&gt;


**FEDERAL COURT**
**COUR FÉDÉRALE**

Good day,  
Please find attached a true copy of the of the following document(s):

Bonjour,  
Veuillez trouver ci-joint une copie conforme du ou des document(s) suivant(s):

|                       |                                     |                         |
|-----------------------|-------------------------------------|-------------------------|
| Judgment              | <input type="checkbox"/>            | Jugement                |
| Reasons for Judgment  | <input type="checkbox"/>            | Motifs du jugement      |
| Order                 | <input type="checkbox"/>            | Ordonnance              |
| Reasons for Order     | <input type="checkbox"/>            | Motifs de l'ordonnance  |
| Direction(s)          | <input checked="" type="checkbox"/> | Directive(s)            |
| Rendered by the Court | Allyson Whyte Nowak                 | Rendu(e)(s) par la Cour |
|                       | Judge/Juge                          |                         |
| Dated                 | 2026-07-02                          | Daté(e)(s)              |

If a certified copy of the above-noted decision is required, please advise and a copy will be forwarded to your attention by regular mail.

Si une copie certifiée de la décision susmentionnée est requise, veuillez-nous en informer et une copie vous sera transmise par courrier régulier.

**PLEASE CONFIRM RECEIPT OF THIS E-MAIL AND ATTACHED DOCUMENT(S), BY REPLY E-MAIL, WITHIN TWO (2) DAYS.**

**VEUILLEZ ACCUSER RÉCEPTION PAR COURRIEL, DANS LES DEUX (2) JOURS, DU PRÉSENT COURRIEL ET DES DOCUMENTS QUI Y SONT JOINTS.**

Anything sent to this e-mail address, other than confirmation of receipt of a decision, will not be considered as having been received by the Registry.

Tout ce qui est envoyé à cette adresse courriel, autre que l'accusé de réception d'une décision, ne sera pas considéré comme ayant été reçu par le greffe.

Pursuant to section 20 of the Official Languages Act, any **final** decisions, orders and judgments, including any reasons given therefore, issued by the Federal Court are made available in both official languages simultaneously or one after the other. If a final decision is issued in one of the official languages and then, at the earliest possible time, in the other official language, a copy of the version in the other official language will be forwarded on request when it is available.

Conformément à l'article 20 de la Loi sur les langues officielles, les décisions, ordonnances et jugements **définitifs** - exposé des motifs compris - rendus par la Cour fédérale sont mis à la disposition du public dans les deux langues officielles soit simultanément ou une à la suite de l'autre. Si une décision définitive est rendue d'abord dans l'une des deux langues officielles, puis dans les meilleurs délais dans l'autre langue officielle, la copie de la version dans l'autre langue officielle sera transmise, sur demande, dès qu'elle sera disponible.

Thank you,

**Maya-Jo Blake-Janniere**

Registry Officer

Courts Administration Service, Toronto Local Office

Service administrative des tribunaux judiciaires, Bureau local de Toronto

---

 **T-2448-26 DIRECTION July 2.pdf**  
42K

---

**Norris, Jake (he him il lui)** <Jake.Norris@justice.gc.ca>

Thu, Jul 2, 2026 at 2:51 PM

To: CAS-SATJ DECISIONS <cas-satj-decisions@cas-satj.gc.ca>, "mclean@searchandseizure.ca" <mclean@searchandseizure.ca>, "Continelli, Nick" <Nick.Continelli@justice.gc.ca>

Cc: R369\_Toronto <R369\_Toronto2@cas-satj.gc.ca>

Good afternoon,

Receipt confirmed on behalf of the Respondent.

Kind regards,

**Jake Norris**

(he/him/il/lui)

Counsel | Avocat

National Litigation Sector | Secteur national du contentieux

Department of Justice Canada | Ministère de la Justice Canada

Ontario Regional Office | Bureau régional de l'Ontario

**120 Adelaide Street West** | 120, rue Adelaide ouest

Suite 400 | Pièce 400

Toronto Ontario M5H 1T1

e-mail | courriel: [jake.norris@justice.gc.ca](mailto:jake.norris@justice.gc.ca)

tel | tél: 416-347-6823

*This communication contains information that may be confidential, exempt from disclosure, subject to litigation privilege or protected by the privilege that exists between lawyers or notaries and their clients. If you are not the intended recipient, you should not read, rely on, retain, or distribute it. Please delete or otherwise destroy this communication and all copies of it immediately, and contact the sender at (telephone number) or by email at (email). Thank you.*

*Ce message contient des renseignements qui pourraient être confidentiels, soustraits à la communication, ou protégés par le privilège relatif au litige ou par le secret professionnel liant l'avocat ou le notaire à son client. S'il ne vous est pas destiné, vous êtes priés de ne pas le lire, l'utiliser, le conserver ou le diffuser. Veuillez sans tarder le supprimer et en détruire toute copie, et communiquer avec l'expéditeur au (no. de téléphone) ou à (courriel). Merci de votre collaboration.*

---

**From:** CAS-SATJ DECISIONS <cas-satj-decisions@cas-satj.gc.ca>

**Sent:** Thursday, July 2, 2026 1:01 PM

**To:** [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca); Continelli, Nick <[Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca)>; Norris, Jake (he him il lui) <[Jake.Norris@justice.gc.ca](mailto:Jake.Norris@justice.gc.ca)>

**Cc:** R369\_Toronto <[R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca)>

**Subject:** T-2448-26 Kevin Alexander McLean v. Royal Canadian Mounted Police

[Quoted text hidden]

Mr. Kevin Alexander McLean <mclean@searchandseizure.ca>

Sun, Jul 12, 2026 at 8:31 PM

To: "Boudreau, David" <David.Boudreau@cas-satj.gc.ca>, "Bakalakis, Christos" <Christos.Bakalakis@cas-satj.gc.ca>

Cc: CAS-SATJ DECISIONS <cas-satj-decisions@cas-satj.gc.ca>, "Continelli, Nick" <Nick.Continelli@justice.gc.ca>, R369\_Toronto <R369\_Toronto2@cas-satj.gc.ca>, jake.norris@justice.gc.ca

Date: July 12, 2026

Classification: Private and Confidential

Sending Method: Via Email

To: CAS-SATJ DECISIONS ([cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca)), Mr. Nick Continelli ([nick.continelli@justice.gc.ca](mailto:nick.continelli@justice.gc.ca)), Mr. Jake Norris ([jake.norris@justice.gc.ca](mailto:jake.norris@justice.gc.ca)), R369\_Toronto2@cas-satj.gc.ca, Mr. Christos Bakalakis, Head Administrator for the Ontario Region ([Christos.Bakalakis@cas-satj.gc.ca](mailto:Christos.Bakalakis@cas-satj.gc.ca)), and Mr. David Boudreau, Chief Administrator ([David.Boudreau@cas-satj.gc.ca](mailto:David.Boudreau@cas-satj.gc.ca))

Subject I: Purported Decision/Direction Rendered by Justice Whyte Nowak on July 2, 2026, Facilitated by Ms. Maya-Jo Blake-Janniere, Federal Court Registry Officer

Subject II: Heraldic and Logographic Discrepancies Between the Valid Directions of Associate Judge Cotter and Associate Judge Crinson Versus the Document Attributed to Justice Whyte Nowak, Including the Involvement of Ms. Maya-Jo Blake-Janniere

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

**Part I: Introduction and Imperative Inquiries**

1. Correspondence is hereby initiated concerning the aforementioned subjects.
2. A critical examination has been conducted regarding the instrument circulated on July 2, 2026, which is ostensibly a direction rendered by Justice Allyson Whyte Nowak and transmitted by Ms. Maya-Jo Blake-Janniere, an official within the Federal Court Registry (the "**Purported Direction**").
3. Prior to delving into the substantive fatal defects of the aforementioned documentation, a formal and unequivocal demand is hereby directed to the Federal Court Registry to immediately produce the definitive nomenclature of the file as denoted in the digital metadata associated with the Purported Direction. It is imperative that this specific metric of digital evidence be obtained and remanded to the presiding adjudicator for the hearing of Notice of Motion #3 (the "**NOM #3**"), scheduled to be heard on Wednesday, July 15, 2026.

**Part II: Procedural Posture and the Doctrine of Nullity**

4. The procedural history dictates an analysis of the prior directions promulgated by Associate Judge Cotter on May 20, 2026, and Associate Judge Crinson on June 24, 2026 (the "**Prior Directions**").
5. Rigorous compliance with the Prior Directions was effectuated through the acceptance of the Certificate of Service on May 20, 2026, and the subsequent execution and filing of Affidavit #1 on July 11, 2026, the latter having been filed under formal protest as an explicit prerequisite for a Requisition for Hearing.
6. The Respondents, having elected to abstain from seeking an internal appellate remedy pursuant to Rule 51 of the *Federal Courts Rules*, SOR/98-106, are effectively noted in default; consequently, they are precluded from asserting any oppositional entitlement to further procedural notice regarding these steps.
7. An intrinsic review of the Purported Direction manifests profound logographic irregularities; specifically, the heraldic emblem utilized upon the instrument is incongruous with the authorized and established insignia of the Federal Court of Canada.
8. It is submitted that the Purported Direction features an emblem that visually replicates the Coat of Arms of Canada, an insignia strictly unauthorized for this distinct judicial application, which contrasts starkly with the proper logographics affixed to the Prior Directions.
9. To anticipate and categorically rebut any counter-argument asserting that such typographical or formatting anomalies constitute curable irregularities under the *Federal Courts Rules*, it is averred that such a proposition is logically deficient *in limine*. A direct contravention of a statutory design, involving the integration of an illegitimate seal, operates as an irremediable defect that strips the document of any *prima facie* legal authority, rendering it a strict nullity rather than a curable procedural lapse.
10. In accordance with the foundational legal maxim *fraus omnia vitiat* (fraud vitiates all), alongside the corollary *ex nihilo nihil fit* (out of nothing comes nothing), the utilization of an unauthorized and misappropriated emblem dictates that the Purported Direction is *void ab initio*. Therefore, the proceeding must be returned to the *status quo ante*.

**Part III: Metadata Anomalies and Technological Manipulations**

11. An exhaustive forensic analysis of the digital footprint belonging to the document exposes deeply concerning anomalies; prominently, the underlying file nomenclature is designated within the metadata as "T-4313-25 direction.docx", evidencing a file origin that is chronologically misaligned with the current 2026 proceeding.
12. The metadata concomitantly indicates the utilization of PDF-XChange Editor, a software application possessing robust optical character recognition and advanced document manipulation capabilities (the "**Software**").
13. The Software is known to operate upon a freemium model, wherein unpaid versions affix watermarks, while it concurrently enables profound alterations to text, layouts, interactive forms, and underlying formatting.
14. Applying the stringent analytical and fiduciary standards inherent to the perspective of a former British Columbia barrister and solicitor and a Chartered Investment Manager, it is observed that such digital artifacts constitute definitive, undeniable evidence of unauthorized document fabrication and alteration.
15. The presence of such manipulative software signatures, amalgamated with the incongruous 2025 file nomenclature, *ipso facto* corroborates the assertion that the Purported Direction is a manufactured and fraudulent instrument.
16. While the general jurisprudential presumption *omnia praesumuntur rite et solemniter esse acta* (all acts are presumed to have been done rightly and regularly) shields customary administrative functions, this presumption is thoroughly and entirely rebutted by the explicit fabrications evident upon the face of the document.

**Part IV: Personnel Integrity and Trademark Misappropriation**

17. Exacerbating the invalidity of the Purported Direction is the transmittal of the instrument by one Ms. Maya-Jo Blake-Janniere.

18. Publicly accessible journalistic archives, specifically a publication dated May 28, 2021, identify an individual bearing the exact appellation—Maya-Jo Blake-Janniere, age 25, of Oshawa—as a party indicted on numerous egregious criminal charges, encompassing weapons offenses, cocaine trafficking, and possession of property obtained by crime (the "**Criminal Indictments**").
19. It is strictly incumbent upon the administration of justice to immediately clarify whether the Registry Officer identified herein is the identical individual named within the aforementioned Criminal Indictments.
20. Concurrently, it is observed that Justice Whyte Nowak's professional biography extols an extensive expertise in intellectual property litigation, including complex trademark, trade secret, and copyright disputes, spanning a twenty-eight-year tenure prior to elevation to the bench.
21. A profound irony is actualized herein: a jurist ostensibly possessing paramount expertise in intellectual property law is purportedly the author and signatory of an instrument characterized by the flagrant misappropriation of a national trademark and court logo.
22. Applying the maxim *nemo dat quod non habet* (no one gives what they do not have), an entity cannot confer legitimate legal authority through an instrument that fundamentally misappropriates the intellectual property and insignia it relies upon for its very jurisdiction.
23. To preemptively neutralize any assertion that judicial immunity insulates such acts, it is submitted that actions taken entirely without jurisdiction, or acts that are *ultra vires* the administrative capacity of the tribunal through overt falsification, forfeit such protections. It is asserted that a jurist's failure to discern the elementary distinctions between filing, serving, and proof of service, compounded with the misappropriation of logos, mandates immediate referral to the Canadian Judicial Council.

#### **Part V: Remedial Demands and Concluding Declarations**

24. In light of the manifest falsifications and jurisdictional overreaches identified, it is categorically declared that the Toronto Registry is divested of any continuing authority over this proceeding.
25. Immediate escalation shall be pursued to the Chief Justice of the Federal Court, the Chief Justice of the Federal Court of Appeal, the Canadian Judicial Council, and the Prime Minister of Canada.
26. Furthermore, it is hereby confirmed that formal requests for the production of the foundational case records and particulars corresponding to the 2025 file nomenclature discovered within the metadata shall be transmitted separately in short order, an action that will invariably result in a subsequent escalation of the costs due and owing in this matter.
27. Expedient and uncompromising measures shall be deployed to ensure these extraordinary circumstances, alongside the corresponding prayers for relief, are placed before the presiding justice in Ottawa for the hearing of NOM #3 on Wednesday, July 15, 2026.
28. It remains a self-evident conclusion that the Purported Direction is an unequivocal nullity, entirely devoid of juridical force or validity, thereby necessitating its immediate expungement from the record.

#### **Part VI: Mandatory Expungement, Jurisdictional Transfer, and Escalation of Costs**

29. It is now unequivocally required, as a matter of strict legal necessity, that formal relief be sought to mandate the absolute expungement of the Purported Direction from the official court file, the Record of Proceeding, or any analogous adjudicative repository, ensuring no vestige of this nullification remains within the official documentation.
30. Given the imminence of the adjudicative proceedings scheduled for Wednesday, July 15, 2026, in Ottawa, Ontario, it is formally confirmed that this precise relief for expungement shall be forcefully advanced under the auspices of the existing NOM #3. Concurrently, all applications for supplementary or resulting relief shall be coordinated and confirmed exclusively with the Ottawa Registry, effectively circumventing the compromised local infrastructure in Toronto.
31. It remains an inescapable conclusion that the current proceeding must be transferred *ex debito justitiae* (as a matter of right) out of the Toronto locus. This imperative directly parallels established historical precedent experienced directly by the Applicant, wherein the deployment of false logistical insignia within a fictitious criminal proceeding before the Ontario Court of Justice (Toronto) and the Superior Court of Justice (Toronto), alongside related systemic matters at the Divisional Court (Toronto), fundamentally necessitated the absolute transfer of those proceedings to preserve judicial integrity.
32. Accordingly, formal transmission regarding these fatal procedural defects, and the consequent necessity for an immediate change of venue, shall be executed independently and directly to the Chief Justice of the Federal Court of Canada, as well as to Mr. David Boudreau in his statutory capacity as Chief Administrator.
33. The obvious question arises as to why the Federal Court of Canada (not Federal Court of Appeal) would be editing a PDF as opposed to not drafting from a Word document? Only time will tell with the underlying disclosures from the underlying metadata
34. That Appendix #4, if it involves the same registry officer, is just absolutely terrifying and I cannot even consider participating in a hearing ever again at the courthouse when registry officers are acquiring weaponry and drugs like that along property from crime especially when I had my property stolen in Toronto from an insurance adjuster named Mr. David Karat of one or some of the insurance companies in the TDI Group. Perhaps, my computer and phone and other pieces of stolen property went into that criminal syndicate drug property ring in Durham and Oshawa as Mr. Karat is from Oshawa as well. I am speculating but something to look into.
35. What is also very interesting is that Justice Whyte Nowak represented the Aga Khan multiple times in court and after TD Insurance companies (multiple) engaged in further fraud with my identification by signing me for an event at the Aga Khan museum on November 8, 2024. Perhaps just another coincidence.
36. As denoted in my filed affidavit of yesterday, as no service was required as per a decision/direction of Associate Judge Mr. Crinson that actually had the Federal Court of Canada logo (along with Associate Judge Cotter as well), I was unaware of the same as you can see it is not contained therein. I reattach the same solely for convenience and ease of reference purposes.
37. Finally on the substantive side, it must be emphatically registered that the interjection of these fabricated instruments has precipitated an exponential and unwarranted multiplication of legal labor. This manufactured exigency has generated a veritable mountain of superfluous administrative and juridical effort, invariably guaranteeing that a substantially elevated quantum of costs shall be strictly sought and rigorously pursued against the responsible entities.
38. Lastly, as the Respondents are non-appearing as per the valid and binding decision of Associate Judge Cotter an Associate Judge Mr. Crinson, and this fraudulent decision/directing of Justice Whyte Nowak was "borne dead", Mr. Norris stated in some letter that I could

seek legal aid for this proceeding. I do not follow and I presume he is wrong but he may wish to stop advising the public that judicial review applications to the Federal Court of Canada entitle applicants to obtain assistance, advice et al from Legal Aid. In any event, I will move to the separate threads to obtain the necessary underlying documents and files, and proceed to Judgment.

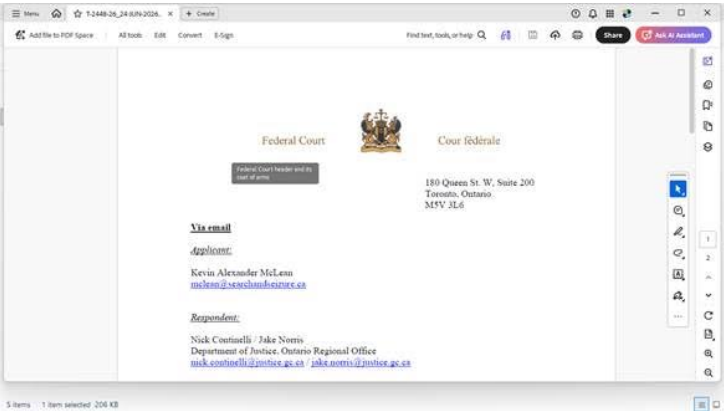
Yours truly,  
Mr. Kevin A. McLean (BA, JD, CIM)

APPENDICES

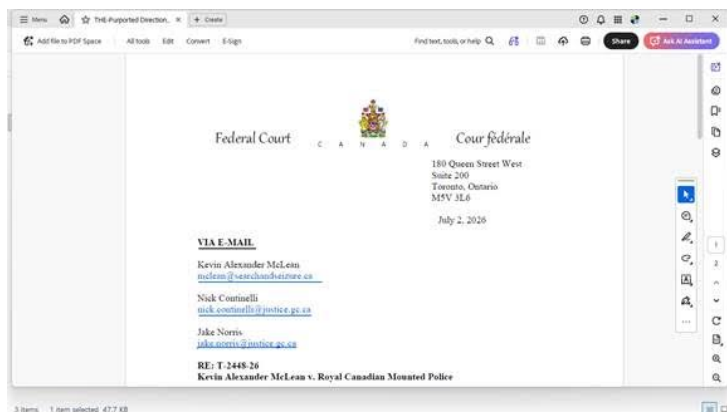
APPENDIX #1



APPENDIX #2



APPENDIX #3



#### APPENDIX #4:

<https://www.durhamradionews.com/archives/139571>

#### Five from Durham among 11 charged as OPP break up drug trafficking network

May 28, 2021 | 1:30 pm



OPP say 11 people are facing charges, including five from Durham Region, after an investigation into a GTA-based drug trafficking network with ties to known street gangs.

Over the course of six months, officers from several police forces looked at fentanyl and cocaine trafficking in Simcoe County and Muskoka.

Officers say the drugs were brought into the area by an organized network of traffickers.

This month, they searched nine properties, including two in Oshawa and one in Ajax. Other places in Barrie, Toronto and Markham were also searched.

Over the course of their investigation, police seized 427 grams of fentanyl, 734 grams of cocaine, 53 grams of crack, Hydromorphone and Oxycodone pills and drug trafficking paraphernalia.

Investigators think the drugs seized represent about 4,144 doses on the street.

Four handguns, five vehicles and over \$100,000 in cash was also uncovered.

The 11 people arrested face a combined 148 charges, including for drug trafficking and gang-related crimes.

Through investigation, police have linked this criminal network to several fatal and non-fatal overdoses between January 2020 and February 2021.

Jordan Lem, 30, of Oshawa is facing 18 charges, including trafficking in fentanyl and cocaine, possession of property obtained by crime and fail to comply with a court order.

Kadeem Knott, 30, of Oshawa faces 22 gun, gang and drug trafficking charges.

Maya-Jo Blake-Janniere, 25, of Oshawa is charged with gun crimes, trafficking cocaine and possession of property obtained by crime.

Nothing past this line

[Quoted text hidden]

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Mr. Kevin Alexander McLean <mclean@searchandseizure.ca>

Sun, Jul 12, 2026 at 8:35 PM

To: "Boudreau, David" <David.Boudreau@cas-satj.gc.ca>, "Bakalakis, Christos" <Christos.Bakalakis@cas-satj.gc.ca>

Cc: CAS-SATJ DECISIONS <cas-satj-decisions@cas-satj.gc.ca>, "Continelli, Nick" <Nick.Continelli@justice.gc.ca>, R369\_Toronto <R369\_Toronto2@cas-satj.gc.ca>, jake.norris@justice.gc.ca

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

I apologize as I did not attach the filed affidavit of yesterday. Please see attached. Thank you.

[Quoted text hidden]



Affidavit #1 - McLean v. RCMP et al - Applicant - MCLEAN - Kevin - 11-July-2026 - FILED.pdf  
6678K

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Mr. Kevin Alexander McLean <mclean@searchandseizure.ca>

Mon, Jul 13, 2026 at 3:26 PM

To: "Boudreau, David" <David.Boudreau@cas-satj.gc.ca>, "Bakalakis, Christos" <Christos.Bakalakis@cas-satj.gc.ca>

Cc: CAS-SATJ DECISIONS <cas-satj-decisions@cas-satj.gc.ca>, "Continelli, Nick" <Nick.Continelli@justice.gc.ca>, R369\_Toronto <R369\_Toronto2@cas-satj.gc.ca>, jake.norris@justice.gc.ca, sam.alviano@justice.gc.ca

Date: July 13, 2026

Classification: Urgent, Private and Confidential

Sending Method: Via Email

To: Mr. David Boudreau, Chief Administrator ([David.Boudreau@cas-satj.gc.ca](mailto:David.Boudreau@cas-satj.gc.ca)), Mr. Christos Bakalakis, Regional Director General ([Christos.Bakalakis@cas-satj.gc.ca](mailto:Christos.Bakalakis@cas-satj.gc.ca)), CAS-SATJ DECISIONS ([cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca)), and the Federal Court Registry (Ottawa/Toronto)

Cc: Mr. Jake Norris ([jake.norris@justice.gc.ca](mailto:jake.norris@justice.gc.ca)), Mr. Nick Continelli ([nick.continelli@justice.gc.ca](mailto:nick.continelli@justice.gc.ca)), R369\_Toronto Local Office ([R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca)), and Mr. Sam Alviano ([sam.alviano@justice.gc.ca](mailto:sam.alviano@justice.gc.ca))

Subject I: URGENT SUPPLEMENTARY CORRESPONDENCE: Definitive Determination of Fraud and Forgery within Proceeding T-2448-26

Subject II: Devastating Evidentiary Nexus Discovered Between the Fraudulent July 2, 2026 Direction, the Canada Revenue Agency in T-4313-25, and the Tax Court of Canada Heraldry

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

## Part I: Introduction and Confirmation of Chief Justice Notification

1. Correspondence is hereby initiated as an urgent and strictly necessary amplification of the prior communications regarding the catastrophic forensic anomalies embedded within the purported direction of July 2, 2026 (the "**Purported Direction**").
2. It is formally confirmed *in limine* that the antecedent correspondence, comprehensively outlining the profound jurisdictional overreaches and the overt digital fabrications embedded within the Purported Direction, has been successfully and definitively transmitted via facsimile directly to the Chief Justice of the Federal Court of Canada.

## Part II: The Devastating Evidentiary Nexus and the Metadata Convergence

3. An exhaustive interrogation of the publicly accessible Recorded Entry Information infrastructure has yielded incontrovertible and devastating evidentiary particulars regarding the proceeding designated under the file nomenclature T-4313-25 (the "**Cloned Proceeding**").
4. The extraction of this data exposes a catastrophic structural nexus. It is observed and definitively established that the Cloned Proceeding, initiated on October 21, 2025, constitutes a Section 18.1 Application for Judicial Review involving one Amira Zekry as the applicant, positioned squarely against the Attorney General of Canada and the Canada Revenue Agency as the named respondents. Furthermore, the docket explicitly confirms the adjudicative involvement of Associate Judge L.E. Trent Horne.
5. The discovery of these precise party identities fundamentally unravels the *modus operandi* of the fraud previously detailed. It is submitted that the presence of the Attorney General of Canada and the Canada Revenue Agency within the foundational metadata of the fabricated Purported Direction perfectly, definitively, and indisputably explains the concurrent, disastrous heraldic anomaly.

## Part III: The Tax Court of Canada Logo and the "Halfway House" Forgery

6. As established in antecedent correspondence, the Purported Direction featured an unauthorized superimposition of a crest visually distinct from the standard Federal Court insignia.
7. It is now advanced, with absolute evidentiary certainty, that the superimposed crest is the precise, authorized institutional logographic identifier utilized by the Tax Court of Canada (bearing the National Coat of Arms). The visual correlation between the official Tax Court of Canada crest and the emblem superimposed upon the Purported Direction is absolute.
8. As matters involving the Canada Revenue Agency routinely interface with the Tax Court of Canada, or utilize Department of Justice tax-litigation templates formally bearing this specific heraldry, the advanced syllogism is inescapable. It is a self-evident conclusion that an external actor, intimately embedded within or possessing unfettered access to the Attorney General of Canada's tax litigation apparatus, recklessly cloned a template from the Cloned Proceeding (T-4313-25).
9. In their haste to synthesize a procedural rejection against the Applicant within the present proceeding, the external actor deleted the Tax Court typography, synthetically typed the words "Federal Court / Cour fédérale", but catastrophically failed to sanitize the document of the Tax Court's heraldry. Concurrently, this external actor neglected to scrub the underlying metadata identifier (T-4313-25 direction.docx) before exporting the fabrication via third-party manipulation software.
10. Applying the venerable maxim *res ipsa loquitur* (the thing speaks for itself), alongside the corollary *ex ungue leonem* (from the claw, the lion), this convergence of a cloned Canada Revenue Agency file identifier and the synthetically grafted Tax Court of Canada heraldry conclusively proves active, multi-layered digital fabrication.

## Part IV: Final Declarations of Nullity

11. The mathematical probability of such a convergence occurring via mere administrative inadvertence is absolute zero. The equitable maxim *fraus omnia corrumpit* (fraud vitiates everything) is strictly engaged.
12. The Purported Direction is unequivocally unmasked not as a mere procedural irregularity, but as a synthetic, post-production forgery manufactured from a 2025 Canada Revenue Agency template. Consequently, it remains a self-evident conclusion that the instrument is entirely devoid of juridical force or validity, existing strictly as a nullity *void ab initio*.

## Part V: Preservation of the Asymmetric Communications Ledger and Transmission Record

13. To definitively preserve the evidentiary record and to explicitly demonstrate the out-of-band communication loop facilitated by the Registry, the complete transmission ledger of the preceding email thread—involving the purported registry officer and the rapid, asymmetric response from Mr. Jake Norris—is hereby formally read into this document.
14. The sequential transmission history is reproduced verbatim below to anchor the administrative reality of these anomalous interventions:

**EMAIL 1: ORIGINATING TRANSMISSION From:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca) **Sent:** Thursday, Jul 2, 2026 at 1:01 PM **To:** [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca); [nick.continelli@justice.gc.ca](mailto:nick.continelli@justice.gc.ca); [jake.norris@justice.gc.ca](mailto:jake.norris@justice.gc.ca) **Cc:** [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca) **Subject:** T-2448-26 Kevin Alexander McLean v. Royal Canadian Mounted Police

Good day, / Bonjour, Please find attached a true copy of the following document(s): Direction(s) Rendered by the Court Allyson Whyte Nowak Judge/Juge Dated 2026-07-02. ... Thank you, Maya-Jo Blake-Janniere Registry Officer Courts Administration Service Toronto Local Office

**EMAIL 2: RESPONDENT'S ASYMMETRIC ACKNOWLEDGMENT From:** Norris, Jake (he him il lui) [Jake.Norris@justice.gc.ca](mailto:Jake.Norris@justice.gc.ca) **Sent:** Thursday, Jul 2, 2026 at 2:51 PM **To:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca), [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca), [Continelli, Nick](mailto:Continelli, Nick) [Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca) **Cc:** [R369\\_Toronto](mailto:R369_Toronto) [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca)

Good afternoon, Receipt confirmed on behalf of the Respondent. Kind regards, Jake Norris Counsel | Avocat National Litigation Sector | Department of Justice Canada

**EMAIL 3: APPLICANT'S URGENT REBUTTAL From:** Mr. Kevin Alexander McLean [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca) **Sent:** Sunday, Jul 12, 2026 at 8:31 PM **To:** Boudreau, David [David.Boudreau@cas-satj.gc.ca](mailto:David.Boudreau@cas-satj.gc.ca), Bakalakis, Christos [Christos.Bakalakis@cas-satj.gc.ca](mailto:Christos.Bakalakis@cas-satj.gc.ca) **Cc:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca), [Continelli, Nick](mailto:Continelli, Nick) [Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca), [R369\\_Toronto](mailto:R369_Toronto) [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca), [jake.norris@justice.gc.ca](mailto:jake.norris@justice.gc.ca)

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns: Part I: Introduction and Imperative Inquiries

1. Correspondence is hereby initiated concerning the aforementioned subjects.
2. A critical examination has been conducted regarding the instrument circulated on July 2, 2026, which is ostensibly a direction rendered by Justice Allyson Whyte Nowak and transmitted by Ms. Maya-Jo Blake-Janniere, an official within the Federal Court Registry (the "Purported Direction"). (Applicant's full submission detailed the logographic discrepancies, the PDF-XChange metadata, the Maya-Jo Blake-Janniere criminal indictments nexus, and demanded immediate expungement of the nullity).

**EMAIL 4: APPLICANT'S AFFIDAVIT TRANSMISSION From:** Mr. Kevin Alexander McLean [mclean@searchandseizure.ca](mailto:mclean@searchandseizure.ca) **Sent:** Sunday, Jul 12, 2026 at 8:35 PM **To:** Boudreau, David [David.Boudreau@cas-satj.gc.ca](mailto:David.Boudreau@cas-satj.gc.ca), Bakalakis, Christos [Christos.Bakalakis@cas-satj.gc.ca](mailto:Christos.Bakalakis@cas-satj.gc.ca) **Cc:** CAS-SATJ DECISIONS [cas-satj-decisions@cas-satj.gc.ca](mailto:cas-satj-decisions@cas-satj.gc.ca), [Continelli, Nick](mailto:Continelli, Nick) [Nick.Continelli@justice.gc.ca](mailto:Nick.Continelli@justice.gc.ca), [R369\\_Toronto](mailto:R369_Toronto) [R369\\_Toronto2@cas-satj.gc.ca](mailto:R369_Toronto2@cas-satj.gc.ca), [jake.norris@justice.gc.ca](mailto:jake.norris@justice.gc.ca)

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns: I apologize as I did not attach the filed affidavit of yesterday. Please see attached. Thank you. [Attachment: Affidavit #1 - McLean v. RCMP et al - Applicant - MCLEAN - Kevin - 11-July-2026-FILED.pdf]

15. The complete Recorded Entry Information detailing the comprehensive docket history of the Cloned Proceeding (T-4313-25), which definitively anchors this fraudulent nexus, is appended directly below for the immediate and uncompromising scrutiny of the Registry.

Yours truly,

Mr. Kevin A. McLean (BA, JD, CIM)

Enclosures (x3)

(nota bene: This is why the fraudulent and forged Purported Direction has "Canada" in it when Federal Court of Canada is only referred to as "Federal Court" and that is why the Coat of Arms is contained therein.



## APPENDIX: RECORDED ENTRY INFORMATION FOR T-4313-25

**Court File Number:** T-4313-25 **Type:** Federal Court **Nature of Proceeding:** S. 18.1 Application for Judicial Review **Filing Date:** 2025-10-21 **Applicant:** Zekry, Amira **Respondents:** ATTORNEY GENERAL OF CANADA (THE), CANADA REVENUE AGENCY

| ID | Date Filed | Office  | Recorded Entry Summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----|------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 16 | 2026-07-06 | Toronto | Acknowledgment of receipt on behalf of: Applicant confirming service of 15-Application Record with proof of service on Respondent(s) by e-mail served on 2026-07-06 filed on 2026-07-06                                                                                                                                                                                                                                                                                                                                  |
| 15 | 2026-07-06 | Toronto | Record on behalf of: Applicant filed on 2026-07-06                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 14 | 2026-06-16 | Toronto | Other placed on file on 2026-06-16 proof of delivery of ID. 13 by email                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 13 | 2026-06-16 | Toronto | Directions of the Court - Oral directions (Interlocutory) dated 2026-06-16 rendered by Associate Judge L.E. Trent Horne without personal appearance regarding doc #9-Letter - Informal Motion Result- granted 2026-06-16 issued to: all parties by email placed on file on 2026-06-16 Application                                                                                                                                                                                                                        |
| 12 | 2026-06-16 | Toronto | Communication to Court from Registry placed on file on 2026-06-16 ID. 9 sent to court for disposition - AJ Horne                                                                                                                                                                                                                                                                                                                                                                                                         |
| 11 | 2026-06-12 | Toronto | Memorandum to file placed on file on 2026-06-12 The Applicant contacted the Registry to follow up on ID:9. Applicant advised on the status.                                                                                                                                                                                                                                                                                                                                                                              |
| 10 | 2026-03-19 | Toronto | Memorandum placed on file on 2026-03-19 The Applicant submitted its Applicant's Record along its informal motion (ID:9) on 19-MAR-2026. The Record is not in compliance with FC Rule 309 and the FC Amended & Consolidated Practice Guidelines: - no proof of service; not properly bookmarked; - Memorandum not compliant with FC Rule 70: no table of content & pages number; -Authorities no hyperlinked. The Applicant advised on the requirements and asked to review, correct and re-submit with proof of service. |
| 9  | 2026-03-19 | Toronto | Letter - Informal Motion on behalf of: Applicant dated 2026-03-17 for an Order on consent to extend the time to serve and file the Applicant's Record to March 20, 2026, pursuant to Rule 8 of the Federal Courts Rules, to be dealt with in Toronto received on 2026-03-19                                                                                                                                                                                                                                              |
| 8  | 2026-03-05 | Toronto | Memorandum to file placed on file on 2026-03-05 The Applicant contacted the Registry to inquire about the next steps in the proceeding. A review of the File indicates that the Applicant has never submitted its record within the deadlines and is now late. Applicant advised on the EOT informal and processes.                                                                                                                                                                                                      |
| 7  | 2025-12-17 | Toronto | Solicitor's certificate of service on behalf of Tyler Alviano Solicitor confirming service of Affidavit of Mark Day upon Applicant by email on 17-DEC-2025 filed on 17-DEC-2025                                                                                                                                                                                                                                                                                                                                          |

- 6 2025-11-18 Toronto Acknowledgment of Service received from Respondent with respect to Affidavit of Amira Zekry filed on 18-NOV-2025
- 5 2025-10-29 Toronto \*\*\*\*\* CANCELLED \*\*\*\*\* Notice of appearance on behalf of Respondent with proof of service upon Applicant on 29-OCT-2025 filed on 29-OCT-2025
- 4 2025-10-29 Toronto Notice of appearance on behalf of Respondent with proof of service upon Applicant on 29-OCT-2025 filed on 29-OCT-2025
- 3 2025-10-30 Toronto Copy of a Letter from Respondent to Applicant dated 30-OCT-2025 advising that Tyler Alviano has conduct of this file received on 30-OCT-2025
- 2 2025-10-29 Toronto Acknowledgment of Receipt received from Department of Justice with respect to Doc 1 via email filed on 29-OCT-2025
- 1 2025-10-21 Toronto Notice of application and 2 copies with regard to Judicial Review (s.18) filed on 21-OCT-2025 Certified copy(ies)/copy(ies) transmitted to Director of the Regional Office of the Department of Justice Tariff fee of \$50.00 received: yes

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### 3 attachments

-  **T-4313-25 - Court Documents involving this file - 15 as of July 13 2026.pdf**  
186K
-  **T-4313-25 - Zekry v AG of Canaada.pdf**  
1207K
-  **Milot Law wins rare Tax Court of Canada decision - Milot Law Canadian Tax Lawyers in Toronto.pdf**  
243K

**Mr. Kevin Alexander McLean** <mclean@searchandseizure.ca>

Mon, Jul 13, 2026 at 5:57 PM

To: "Boudreau, David" <David.Boudreau@cas-satj.gc.ca>, "Bakalakis, Christos" <Christos.Bakalakis@cas-satj.gc.ca>

Cc: CAS-SATJ DECISIONS <cas-satj-decisions@cas-satj.gc.ca>, "Continelli, Nick" <Nick.Continelli@justice.gc.ca>, R369\_Toronto <R369\_Toronto2@cas-satj.gc.ca>, jake.norris@justice.gc.ca, tyler.alviano@justice.gc.ca

Dear Sirs/Mesdames:

Please accept my apologies. I previously included the name "Sam Alviano" when the reference should have been to Tyler Alviano. I have therefore removed the name Sam Alviano and have included Tyler Alviano by email only.

I also note that Mr. Jake Norris appears to have experience in the tax field, including by acting as counsel in Court File No. CV-25-00752340-00CL before the Ontario Superior Court of Justice (Commercial List), in the matter between Deutsche Bank Trust Company Americas, Deutsche Bank AG, Canada Branch, and The Bank of Nova Scotia, as applicants, and GSC Solar Fund I LP, GSC Solar Fund I GP Inc., GSC Solar Fund II LP, GSC Solar Fund II GP Inc., GSC Solar Leasing LP, and GSC Solar Leasing GP Inc., among others.

For ease of reference, Mr. Norris's contact information is as follows: Jake Norris, Tel: 416.347.6832, Email: [Jake.Norris@justice.gc.ca](mailto:Jake.Norris@justice.gc.ca). He is identified as counsel to His Majesty the King in Right of Canada, as represented by the Minister of National Revenue.

I will proceed accordingly and ask that you kindly govern yourselves accordingly.

If costs are sought, I will provide notice to the relevant persons so that they may have an opportunity to respond to any request for costs against them in their personal capacities.

In light of the circumstances, it is not just unlikely but impossible that I can receive a fair hearing in Toronto. Accordingly, all future filings will be made in Ottawa, directed to the attention of the Chief Justice of the Federal Court of Canada, with presumed carriage as appropriate.

My correspondence to the Chief Justice of the Tax Court of Canada, the Chief Justice of the Federal Court of Appeal, and the Chief Justice of the Federal Court of Canada is being sent to address these concerns and to ensure that this type of conduct does not occur in the future.

I reserve the right to rely on this correspondence for all lawful reasons.

Thank you.

[Quoted text hidden]

**Mr. Kevin Alexander McLean** <mclean@searchandseizure.ca>

Mon, Jul 13, 2026 at 6:00 PM

To: "Boudreau, David" <David.Boudreau@cas-satj.gc.ca>, "Bakalakis, Christos" <Christos.Bakalakis@cas-satj.gc.ca>

Cc: CAS-SATJ DECISIONS <cas-satj-decisions@cas-satj.gc.ca>, "Continelli, Nick" <Nick.Continelli@justice.gc.ca>, R369\_Toronto <R369\_Toronto2@cas-satj.gc.ca>, jake.norris@justice.gc.ca, tyler.alviano@justice.gc.ca, tharaka.thurairajah@justice.gc.ca

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

Unsurprisingly, Mr. Alviano is away from the office but he included his colleague acting in his stead, and he or she is now copied. Thank you.

[Quoted text hidden]