

FEDERAL COURT

BETWEEN:

KEVIN A. McLEAN

Applicant

– and –

ROYAL CANADIAN MOUNTED POLICE, MICHAEL DUHEME, JEFFREY BALL, and STEPHANE
BRISSON

Respondents

NOTICE OF MOTION

(Applicant's NOM #3 - Amplified with Fresh Evidence of Institutional Fraud)

TAKE NOTICE THAT the Applicant, Kevin A. McLean (BA, JD, CIM), will make a motion to the Federal Court of Canada, on **Wednesday, July 22, 2026, at 9:30 AM**, at the Federal Court, 90 Sparks Street, Ottawa, Ontario.

I. RELIEF SOUGHT

THIS MOTION IS FOR the following relief in the form of Orders, including declaratory relief:

A. Foundational Adjudicative Orders and Apex Supervisory Declarations

1. AN ORDER that this NOM #3 Motion was heard partly orally and partly in writing before the Acting Chief Justice of the Federal Court of Canada and the decision was under reserve;
2. An Order directing that NOM #1, having been explicitly directed to proceed in writing by the June 24 **Decision/Other Disposition** of Associate Judge Crinson, be heard and decided on an expedited, forthwith basis by the assigned puisne judge or, absent such assignment, directly by the Acting Chief Justice of the Federal Court;
3. An Order abridging any and all applicable temporal periods prescribed by the *Federal Courts Rules* (the “FCR”), including but not limited to Part 7 – Motions (where applicable) as strictly necessary to permit this Notice of Motion (the “NOM #3”) and the underlying substantive relief sought within the second notice of motion (the “NOM #2”) to be heard and definitively determined as expeditiously as the Acting Chief Justice may direct;

4. A Declaration that any direction issued by Justice Whyte Nowak post facto the return date of a motion was procedurally impermissible under the *FCR*, as such actions require the bringing of a formal motion pursuant to *FCR* Rule 8(2), and no such motion was extant before said jurist;
5. A Declaration that *FCR* Rule 369 had no applicability to the administrative rejection executed, and its inclusion or invocation under a registry officer's name within the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** is entirely inappropriate and *ultra vires*;
6. A Declaration and Order that Justice Whyte Nowak was never seized of the Proceeding and, as such, can be formally stripped of her non-seizing of the Proceeding;
7. A Further Declaration that no puisne judge possesses the inherent power to self-assign a proceeding per se;
8. A Declaration that the Chief Justice of the Federal Court possesses the exclusive power of self-assignment and roster management;
9. A Declaration that the Chief Justice of the Federal Court has the implied power to relieve a judge of certain judicial functions, alongside the explicit power to direct Registrars in matters assigned by law to the judiciary;
10. A Declaration that, in light of the profound challenges, controversies, high-profile nature of this matter, and the circumstances placing the focus directly upon the integrity of the Court, this Proceeding constitutes a 'Chief Justice's Case' mandating apex supervisory adjudication;
11. An Order dispensing with strict compliance with any procedural strictures of the *FCR* that might otherwise impede the immediate ingestion and adjudication of this motion, recognizing the profound jurisdictional anomalies and overt institutional fraud discovered herein as “special circumstances” unequivocally warranting relief pursuant to *FCR* Rule 55;
12. An Order granting sweeping procedural relief nunc pro tunc to validate any perceived irregularities, structural anomalies, or temporal defects inherent in the form, timing, filing, and transmission of this Notice of Motion, explicitly encompassing the utilization of Form 359 for a motion instituted pursuant to *FCR* Rule 369, with such validation operating retroactively and effectively as of the precise date of electronic submission and concurrent hand delivery to the Toronto local office;

13. A Declaration and Order establishing that the adjudication of any and all alleged procedural irregularities falls within the exclusive supervisory purview of the Acting Chief Justice of the Federal Court, and concurrently declaring that no motion to attack such perceived irregularities has been instituted by the Respondents, nor can any such motion be lawfully advanced by said Respondents owing to their absolute, continuing, and uncured default;

B. Declarations of Nullity, Forgery, Contempt, and Statutory Contraventions

14. A Declaration and Order that the purported direction issued by Justice Whyte Nowak on July 2, 2026 (the “**Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)**”), and her acts were *Factum A Judice, Quod Ad Officium Jure Non Pertinet Ratum Non Est*, is void ab initio, *coram non judice*, and of absolutely no force or effect, predicated upon a fundamental absence of jurisdiction and statutory authority;
15. A Declaration that, pursuant to the explicit statutory dichotomy between an “Order” under *FCR* Rule 2 (which broadly includes a decision or other disposition) and a “Judgment” under Section 27 of the *Federal Courts Act* (which triggers appellate jurisdiction), the June 24 **Decision/Other Disposition** constituted a binding “Order” subject exclusively to a formal *FCR* Rule 51 motion. Consequently, the failure of the Respondents to invoke Rule 51 rendered the June 24 **Decision/Other Disposition** unassailable, transforming the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** into an impermissible, *ultra vires* collateral attack;
16. A Declaration that the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** constitutes a “false document” as interpreted under the Criminal Code of Canada, as it is a document that is false in relation to the very purpose for which it was created, and that its synthesis triggers the actus reus and mens rea of “forgery” based upon an intent to deceive the Applicant and the Court as to its jurisdictional authenticity;
17. A Declaration that the unauthorized, synthetic superimposition of the National Coat of Arms upon the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** constitutes a forgery by making a material addition to a genuine document or adding a false seal;
18. A Declaration that the electronic dissemination and reproduction of the fabricated **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** by Maya-Jo Blake-Janniere constitutes “uttering” or “using” a forged document at law;

19. A Declaration that Justice Whyte Nowak owed an absolute, non-delegable duty to the administration of justice to ensure that any instrument released in her name was accurate, true, honest, and accurately reflected the specific Court (the Trial Division) in which she was purporting to sit;
20. An Order compelling Justice Whyte Nowak and Registry Officer Maya-Jo Blake-Janniere to provide sworn evidence (via affidavit or oral examination) delineating precisely who authorized, synthesized, and ultimately disseminated the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)**;
21. A Declaration that any findings, directives, or conclusions articulated within the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** that contradict or are inconsistent with the valid **Decision/Other Disposition** issued by Associate Judge Crinson on June 24, 2026 (the “June 24 **Decision/Other Disposition**”), constitute an impermissible collateral attack upon a governing judicial directive, and are consequently subject to the doctrines of issue estoppel and internal res judicata;
22. A formal Declaration that the forensic metadata extracted from the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)**—specifically the identification of third-party post-production manipulation software (“PDF-XChange Editor”) and the harboring of a disparate, cloned file identifier (“T-4313-25 direction.docx”)—definitively establishes that the instrument is a synthetic fabrication devoid of authentic judicial provenance, triggering the maxim *Fraus omnia corrumpit*;
23. A Declaration that the unauthorized commercial superimposition of the National Coat of Arms (an appellate and executive crest) upon the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)**, rather than the constitutionally mandated 2008 Federal Court Trial Division Coat of Arms, constitutes an actionable contravention of section 9(1)(e) and 9(1)(n.1) of the *Trademarks Act*, RSC 1985, c T-13, and the Copyright Act, RSC 1985, c C-42;
24. A Declaration that the incorporation of the Official Languages Act boilerplate translation requirement—a footer strictly designated for substantive Reasons for Judgment—onto the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** conclusively proves the document was hastily cloned from an antecedent substantive judgment template;

25. A Declaration that the June 24 **Decision/Other Disposition** issued by Associate Judge Crinson constituted a “decision” and therefore an “Order” as defined by the *Federal Courts Rules*, and that Justice Whyte Nowak, Maya-Jo Blake-Janniere, and other complicit actors yet to be ascertained, actively disobeyed this Order of the Court, thereby committing contempt contrary to *FCR* Rule 466(b);
26. A Declaration that the actions of Justice Whyte Nowak, Maya-Jo Blake-Janniere, and other complicit actors, in fabricating, uttering, and enforcing the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)**, interfered with the orderly administration of justice and impaired the authority and dignity of the Court, thereby constituting contempt under *FCR* Rule 466(c);
27. An Order mandating the absolute and permanent expungement of the fabricated **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** from the official court file, the Record of Proceeding, and any internal adjudicative or administrative repository of the Courts Administration Service, utilizing *FCR* Rule 74 and Rule 394, restoring the procedural record to its unadulterated status quo ante;

C. Declarations Regarding Jurisdiction, Service, Notice, and Default

28. A Declaration that Associate Judge Crinson, acting pursuant to *FCR* Rule 50(1) and the statutory definition of “Court” articulated within *FCR* Rule 2, possessed the requisite and unassailable statutory jurisdiction to hear, manage, and determine procedural matters and motions in writing, rendering the June 24 **Decision/Other Disposition** a binding judicial order in limine;
29. A Declaration that the sole procedural controversy stemming from the June 24 **Decision/Other Disposition**—specifically, the imposition of a requirement to file supporting affidavits, which implicitly and paradoxically necessitates service upon defaulting respondents contrary to *FCR* Rule 145—constitutes a discrete public interest issue currently before this Honourable Court, and that in all other respects, the Associate Judge's determinations were entirely proper, intra vires, and unassailable absent a formal appellate mechanism;
30. A Declaration that the Respondents, as confirmed by the June 24 **Decision/Other Disposition** citing inter alia *FCR* Rule 145, are not entitled to formal *service* of steps due to their continuing and uncured default; consequently, any prior, present, or future provision of service to the Respondents is hereby declared strictly null, void, and formally

retracted. It is further declared that the swearing and inclusion of affidavits within the Application Record strictly for the purposes of *service* upon said defaulting Respondents is a procedural nullity and not required at law;

31. A Declaration that Justice Whyte Nowak, operating exclusively out of the Toronto Local Office, lacked the jurisdictional authority to issue sweeping directions regarding NOM #2 post facto, as said motion had already been transmitted to the Ottawa Principal Office for determination by the Acting Chief Justice;
32. A Declaration that, pursuant to *FCR* Rule 34 and *FCR* Rule 369, a moving party bringing a motion in writing against unopposed respondents retains the strict procedural right to request a specific return date at a general sitting, and that the assertion to the contrary within the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** constitutes an actionable misstatement of law;
33. A Declaration strictly differentiating the statutory mechanism of *service* (which the Respondents forfeited under Rule 145) from the ethical provision of institutional *notice*. It is declared that the Applicant possesses the absolute right to serve institutional courtesy notice upon implicated actors (e.g., Jake Norris, Tyler Alviano, Justice Whyte Nowak) and executive oversight bodies (the Minister of Justice, Chief Justices) for the purposes of whistleblowing and establishing a definitive evidentiary record of fraud, completely independent of *FCR* service obligations;

D. Orders for Forensic Production, Unsealing, and Security Audits

34. An Order directing the Courts Administration Service (the “CAS”) to immediately produce the native, unadulterated electronic PDF file of the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)**, alongside the comprehensive Electronic Filing System transmission logs and network audit trails corresponding to said upload date, to identify the originating IP address of the fabrication;
35. An Order directing the Registry to immediately unseal, verify, and formally disclose the complete, unredacted case file, counsel of record, and specific litigants associated with the antecedent proceeding bearing Court File No. T-4313-25 (now definitively linked to the Canada Revenue Agency and the Attorney General of Canada), recognizing that said metadata artifact embedded within the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** functions as a cryptographic breadcrumb (*Ex ungue leonem*) essential to unmasking the forgery;

36. An Order directing the CAS to produce formal, verified employment credentialing, security clearance, and institutional roster records corresponding to the individuals identified as “Maya-Jo Blake-Janniere” and “Tristan Mercieca”;
37. An Order directing the CAS to execute a comprehensive security audit concerning “Maya-Jo Blake-Janniere,” specifically investigating the incontrovertible nexus to the Criminal Code infractions detailed within the public record (Oshawa OPP drug and firearms trafficking syndicate, May 2021), and a Declaration striking the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** from the docket as the product of a compromised state informant acting in an administrative capacity;

E. Institutional Relief and Costs

38. An Order mandating that the NOM #2 be heard concurrently with the present NOM #3, and that such matters be adjudicated in conjunction with the hearing of the substantive application, subject to the granting of leave as predicated upon the Applicant's infeasible right to tender further submissions subsequent to the mandatory transmission of the Certified Tribunal Record;
39. A Permanent Order restraining Justice Whyte Nowak from any further involvement, adjudication, or the issuance of directions in this proceeding, thereby preserving procedural fairness, institutional impartiality, and the overarching integrity of the administration of justice;
40. An Order permanently transferring this proceeding ex debito justitiae from the compromised Toronto Local Office to the Ottawa Principal Office;
41. An Order declaring that the out-of-band communications traversing the registry constituted a clandestine, undocketed “phantom” *FCR* Rule 51 internal appeal, effectively usurping formal motion requirements through the illicit collusion of junior Department of Justice counsel;
42. An Order granting the substantive relief sought within NOM #1 and NOM #2 in substantially the same form as requested therein;

43. An Order mandating that Justice Whyte Nowak tender a formal, public apology to the Tax Court of Canada for the unauthorized misappropriation of its institutional emblem, and concurrently to the Prime Minister of Canada, the Right Honourable Mark Carney, for the illicit misuse of the National Coat of Arms;
44. An Order directing the Minister of Justice and Attorney General of Canada, the Honourable Sean Fraser, to immediately convene an independent, external investigation into the systemic “ghost drafting” of judicial decisions by members of the executive branch on behalf of the judicial branch, to rectify this profound subversion of the separation of powers;
45. An Order directing the Chief Administrator of the Federal Court to formally transmit certified copies of the impugned **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** and the underlying forensic metadata to the Law Society of Ontario, compelling an immediate regulatory investigation into any and all licensees implicated in this fabrication;
46. A Declaration that the impugned individuals, not necessarily the Respondents themselves, have abused the process of this Federal Court;
47. Costs of this motion awarded on an elevated, full-indemnity scale, payable forthwith in a lump sum amount commensurate with the hours spent in untangling the fraud, bad faith, dishonesty, bribery and extortion at no less than **\$100,000** by the time of the hearing. An Order that said costs be apportioned against the contravening individuals or persons accordingly; and
48. Such further and other equitable or declaratory relief as this Honourable Court may deem just and appropriate in limine.

II. GROUNDS FOR THE MOTION

48. The grounds upon which this motion is predicated are meticulously delineated herein:

A. The Statutory Competence of Associate Judges and the Prohibition of Collateral Attack

49. The jurisprudential architecture of the Federal Court is strictly codified. Pursuant to *FCR* Rule 2, the term “Court” is explicitly defined to mean “the Federal Court, including an associate judge acting within the jurisdiction

conferred under these Rules.” Concurrently, *FCR* Rule 50(1) grants an associate judge sweeping jurisdiction to hear and make necessary orders relating to any motion under the Rules.

50. Associate Judge Crinson possessed the absolute statutory competence to issue the June 24 **Decision/Other Disposition**. Furthermore, in accordance with *FCR* Rule 369(4), the determination that NOM #1 would be determined in writing was a lawful, binding exercise of judicial authority.
51. 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.
52. The **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** was issued without the engagement of any appellate mechanism pursuant to *FCR* Rule 51. By functionally overturning the procedural determinations rendered by Associate Judge Crinson, the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** operates as an *ultra vires* collateral attack, violating the principle of internal res judicata and issue estoppel.

B. The Jurisprudential Impossibility of Appealing Judicial Directions (*FCA* vs. *FCR*)

53. It is established law that a “Direction” issued by the Federal Court does not possess the formal characteristics of a “judgment” under Section 27 of the *Federal Courts Act*. Consequently, a direction lacks the requisite legal finality to be subjected to an appeal before the Federal Court of Appeal.
54. However, under *FCR* Rule 2, an “order” is broadly defined to include a “decision or other disposition.” The June 24 **Decision/Other Disposition** issued by Associate Judge Crinson constituted a binding “decision,” qualifying strictly as an “order” under the *FCR*. Consequently, the exclusive, mandatory mechanism to challenge this order was a formal motion to appeal to a Federal Court judge pursuant to *FCR* Rule 51. Because the Respondents failed to invoke Rule 51, the June 24 **Decision/Other Disposition** became unassailable. The intervening conduct of Justice Whyte Nowak completely bypassed this strict statutory architecture.

C. The Limits of Judicial Immunity, Adjudicative Privilege, Administrative Privilege and Contempt of Court

55. While judges enjoy judicial immunity for actions taken within their judicial capacity, the requirement that they act within their lawful jurisdiction remains paramount. A judge who acts entirely outside their jurisdiction—whether

de facto or de jure—cannot claim absolute privilege or immunity. When the Court has no jurisdiction of the cause, the whole proceeding is *coram non judice*.

56. Pursuant to Rule 466 of the *Federal Courts Rules*, a person is guilty of contempt of Court if they disobey a process or order of the Court (Rule 466(b)), or act in such a way as to interfere with the orderly administration of justice, or to impair the authority or dignity of the Court (Rule 466(c)).
57. Because the June 24 **Decision/Other Disposition** strictly falls under the *FCR* definition of an “Order,” the subsequent synthesis and transmission of the fabricated **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** flagrantly disobeyed a binding Order of the Court. Nullifying the existing direction of an Associate Judge without jurisdiction, and deploying a False Document to achieve this end, represents the absolute pinnacle of contemptuous interference.

D. The Statutory Forgery: False Document and Uttering

58. The **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** formally constitutes a “false document” as defined by federal statute. A document is materially false if it is false in relation to the purpose for which it was created. By incorporating an unauthorized appellate crest and cloned tax file metadata to simulate a Trial Division directive, the document is materially false in relation to its purpose.
59. Furthermore, the unauthorized superimposition of the National Coat of Arms constitutes forgery by making a material addition to a genuine document or adding a false seal. The requisite intent for forgery merely requires an intent to deceive (inducing a state of mind that a false document is genuine), rather than an intent to defraud. The “halfway house” forgery of the crest demonstrates this precise intent to deceive the Applicant into believing the document possessed appellate authority.
60. The electronic transmission of this manipulated PDF by Maya-Jo Blake-Janniere constitutes the “use” and “uttering” of a forged document, as established by binding appellate jurisprudence.

E. Forensic Fabrication and Metadata Cloning (The T-4313-25 Anomaly (contained under “Title” in the “PDF Properties”))

61. Exhaustive forensic interrogation of the digital metadata within the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** exposes the clandestine utilization of third-party, commercial post-production manipulation software (PDF-XChange Editor), bypassing the secure, native Microsoft Word macro-templates utilized by the CAS.
62. Embedded immutably within the properties of this manipulated file is the title: “T-4313-25 direction.docx”. This internal file identifier corresponds to a 2025 proceeding involving the Canada Revenue Agency and the Attorney General of Canada. This metadata artifact operates as an incontrovertible cryptographic breadcrumb, proving that a preexisting executive branch litigation template was hijacked to synthesize the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)**.

F. The Misappropriation of Appellate Heraldry (The National Coat of Arms)

63. The Federal Court (formerly Federal Court Trial Division) operates strictly utilizing its designated 2008 Coat of Arms to visually separate its trial-level mandate from the executive branch and appellate tribunals.
64. Conversely, the **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** features a synthetically grafted iteration of the National Coat of Arms of Canada. The National Coat of Arms is the authorized insignia utilized exclusively by provincial appellate bodies, the Federal Court of Appeal, and the Tax Court of Canada. This catastrophic heraldic error firmly links the forgery to the cloned 2025 Tax Court/CRA template.

G. Trademarks Act and Copyright Act Contraventions

65. 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*, RSC 1985, c T-13. Furthermore, under Crown copyright, permission is strictly required when official works are adapted or translated.

H. The Criminality Nexus and Phantom Registry Personnel

66. The **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)** was disseminated by one “Maya-Jo Blake-Janniere,” an individual absent from contemporary public federal employment registries.

67. Publicly accessible journalistic archives from May 2021 identify an individual bearing this exact appellation as a primary target indicted on numerous egregious charges, including weapons offenses and cocaine trafficking syndicates. 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.

I. The Subversion of the Adjudicative Apparatus (Clandestine Collusion)

68. The evidentiary record confirms that Mr. Tyler Alviano, junior counsel within the Department of Justice, served as counsel of record for the Attorney General in the antecedent cloned proceeding (T-4313-25).

69. It is posited that Mr. Jake Norris, counsel for the Respondents in the present matter, facing a procedural impossibility due to Associate Judge Crinson's binding **Decision/Other Disposition**, colluded to obtain a Tax Court template from the 2025 proceeding. This template was then manipulated to secure the endorsement of Justice Whyte Nowak ex parte, constituting a clandestine, un-docketed “phantom” internal appeal.

J. The Norris/Lam Correspondence and the Adverse Inference Regarding Regional COM Mr. Peggs

70. In recently discovered correspondence authored by Mr. Jake Norris and transmitted via Ms. Alaina Lam, the Respondents' counsel forcefully demanded that the Applicant direct communications exclusively to RCMP Regional Commander Mr. Matt Peggs. An adverse inference must be formally drawn regarding this highly irregular administrative funneling, suggesting a coordinated attempt to route inquiries to a specific operational node to shield the broader institutional apparatus.

K. The Jurisprudential Distinction Between Notice and Service

71. Under the *Federal Courts Rules*, “notice” refers to the core purpose of keeping a party informed, while “service” is the formal, legally mandated mechanism used to establish jurisdiction. The Respondents are in absolute default, rendering any subsequent demand for formal “service” a legal impossibility under *FCR* Rule 145.

72. However, the Applicant explicitly relies upon this jurisprudential distinction to provide institutional “notice” to the implicated actors within this Notice of Motion, satisfying the ethical purpose of keeping the respective authorities informed, completely independent of the mechanical strictures of formal “service.”

L. Statutory Mechanisms for Expungement and Implied Jurisdiction

73. The Federal Court possesses the implied power to prevent the misuse of its procedures. Under *FCR* Rule 74(1) (“Removal of Documents”), the Court maintains the direct statutory vehicle to physically or electronically excise a document from the active court Record of Proceedings if it constitutes an abuse of process. A document bearing a false insignia and cloned external metadata fundamentally triggers the immediate execution of Rule 74.

74. Furthermore, *FCR* Rule 394 provides the Court with a swift statutory vehicle to completely nullify any direction that contains an error arising from an administrative irregularity.

75. While the actions of registry officers and judges are legally shielded by the presumption of regularity, this presumption is thoroughly rebutted if an applicant tenders verifiable physical evidence of an administrative defect, such as the non-native commercial editing software signatures and the cloned 2025 external file identifier presented herein.

III. DOCUMENTS TO BE RELIED UPON

76. The following documents are relied upon:

- a. The June 24, 2026, **Decision/Other Disposition** of Associate Judge Mr. Crinson;
- b. The July 2, 2026, **Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT)**;
- c. The May 20, 2026, Direction of Associate Judge Cotter (and corresponding native Microsoft Word metadata);
- d. The Applicant's July 6, 2026, Supervisory Review Letter and Transmission Confirmation;
- e. The Applicant's July 13, 2026, Urgent Notification of Institutional Fraud to the Three Chief Justices (Federal Court, Federal Court of Appeal, Tax Court);
- f. The Notice of Application FILED on May 15, 2026;
- g. The Rule 317 Request FILED on May 20, 2026, and the Certificate of Service FILED on May 20, 2026;
- h. The Applicant's accepted for filing, post the Associate Judge Mr. Cotter direction, certificate of service of May 20, 2026;
- i. The Recorded Entry Information for Court File No. T-4313-25;
- j. The Durham Radio News Publication dated May 28, 2021, detailing the OPP Project Garfield arrests;
- k. The GrapeCity/Mescius SDK PDF False Information Package Error Analysis Chart;
- l. The Applicant's Motion Record for NOM #3;
- m. The Applicant's MOFL/Written Representations herein;
- n. The Applicant's Book of Authorities (previously submitted) and any additions to the same;

- o. All other documents contained within the formal court file, explicitly encompassing all documents, affidavits, and exhibits referenced within NOM #1 and NOM #2;
- p. Any further documentary evidence, acta, or materials the Applicant may file or that this Honourable Court may permit in limine.

DATED: July 15, 2026



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INSTITUTIONAL AND COURTESY NOTICE PROVIDED TO:

The following individuals and institutional bodies are provided explicit notice of this motion and the underlying institutional fraud purely as an act of ethical transparency and formal record-preservation (whistleblowing), and strictly not as an act of statutory “service”:

1. Mr. Jake Norris, Counsel, Department of Justice
2. Mr. Nick Continelli, litigation counsel, Department of Justice
3. Mr. Tyler Alviano, lawyer, Department of Justice (Tax Services)
4. Ms. Maya-Jo Blake-Janniere, Federal Court Registry Officer
5. All other registry officers whose names provided an auto-reply to a R.369 email account
6. Madam Justice Allyson Whyte Nowak, Federal Court of Canada
7. The Honourable Sean Fraser, Minister of Justice and Attorney General of Canada
8. The Honourable Gabrielle St-Hilaire, Chief Justice of the Tax Court of Canada
9. The Honourable Yves de Montigny, Chief Justice of the Federal Court of Appeal