

FEDERAL COURT

BETWEEN:

KEVIN ALEXANDER McLEAN

Applicant

– and –

ROYAL CANADIAN MOUNTED POLICE, COMMISSIONER MICHAEL DUHEME, JEFFREY BALL,
AND STEPHANE BRISSON

Respondents

**SUPPLEMENTAL WRITTEN REPRESENTATIONS OF THE APPLICANT FOR NOM #2 AND ALL OUTSTANDING
ISSUES CONTAINED IN THE APPLICATION RECORD (2ND UPDATED) (JUNE 28, 2026) FOR HEARING OF THE
NOM #2 ON JUNE 30, 2026 IN OTTAWA, ONTARIO VIA WRITTEN HEARING (OR HYBRID IF THE APPLICANT IS
SO REQUESTED)**Filed by Fax Pursuant to *Rule 71*

Filed by:

Mr. Kevin A. McLean (BA, JD, CIM)
68 Abell St. (Receptionist desk) Toronto, ON M6J 0B1
Email: mclean@searchandseizure.ca**I. INTRODUCTION AND POSITION OF THE APPLICANT**

1. The subsequent supplemental written representations are hereby respectfully proffered to assist the Honourable Court in the adjudication of the notice of motion #1 (the “**Notice of Motion #1**”) (see: **Tab #4**; page 110), the notice of motion #2 (the “**Notice of Motion #2**”) (see: **Tab #0**; page 4), and the overarching application for judicial review (the “**Application**”) (see: **Tab #1**; page 15), presently scheduled for disposition on June 30, 2026, before the Honourable Acting Chief Justice of the Federal Court of Canada, Madam Justice St. Louis.
2. Pursuant to the doctrine of *primus inter pares*, alongside the jurisprudential authorities delineated within Tabs 0, 26, and 28 of the evidentiary record—encompassing *R. v. Baldovi* (the “*Baldovi Decision*”)ⁱ; *Ruffo v. Conseil de la magistrature* (the “*Ruffo Decision*”) (see: **Tab #26**; page 865), *Reference re Remuneration of Judges of the Provincial Court of Prince Edward Island* (the “*Provincial Judges Reference*”) (see: **Tab #28**; page 920), *Girouard v. Canada (Attorney General)* (the “*Girouard Decision*”) (see: **Tab #28**; page 945), and *Dugré v. Canada (Attorney General)* (the “*Dugré Decision*”) (see: **Tab #28**; page 970)—it is unequivocally posited that the structural, interim, injunctive, and *mandamus* relief necessitated herein must be promulgated exclusively by a Justice of this Honourable Court. The adjudication of such substantive and structural relief cannot be delegated to, nor impeded by, any quasi-directional pronouncements of an Associate Judge, in strict adherence to the maxim *delegatus non potest delegare* (a delegate cannot further delegate) (see: **Tab #0**; page 6). Since the apex adjudication in *Ruffo v. Conseil de la magistrature*, [1995] 4 S.C.R. 267 (the “*Ruffo Decision*”), as explicitly cited and fortified by the “*Baldovi Decision*”, the doctrine of *primus inter pares* (the “**Primus Inter Pares**”) has emerged as a substantive, rather than merely ceremonial, designation of seniority. 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**”).ⁱⁱ

It must be prominently noted *in limine* that no notice of appearance (the “**Notice of Appearance**”), no certified tribunal record (the “**Certified Tribunal Record**” or “**CTR**”) (see: **Tab #2**; page 45), nor any evidentiary affidavits or legal submissions have been effectuated by the Respondents. Consequently, the evidentiary foundation meticulously laid by the Applicant stands utterly uncontroverted, rendering the factual matrix *prima facie* established (see: **Tab #4**; page 110). The multifaceted and unprecedented juridical issues crystallized herein emanate directly from the now-admitted, and minimally deduced, institutional failures of the respondent Royal Canadian Mounted Police (the “**RCMP**”). The architecture of federal information retrieval within Canadian law enforcement is defined by an inherent tension between centralized statutory accountability and highly decentralized operational custody (see: **Tab #31**; page 1045). The RCMP, functioning simultaneously as a federal, provincial, territorial, and municipal policing body, maintains a vastly distributed organizational structure encompassing over seven hundred (700) detachments and multiple specialized directorates. Because this administrative footprint is so expansive, the federal access to information regime relies upon a delegation model, wherein the central Access to Information and Privacy Branch (the “**ATIP Branch**”) acts strictly as an administrative coordinator. It is empirically demonstrated that the RCMP categorically failed to assign the *Access to Information Act* (the “**ATIA**”) requests to an appropriately designated **Office of Primary Interest** (the “**Office of Primary Interest**” or “**OPI**”) (see: **Tab #35**; page 1205). The conceptual framework of the **OPI**—the specific division that originally created, collected, or currently exercises operational control over the records—remained entirely undisclosed to the Applicant until it was ostensibly invoked by Ms. Beaudoin of the ATIP Branch (see: **Tab #35**; page 1210).

3. The evidentiary record unequivocally elucidates the following incontrovertible facts regarding the systemic evasion of statutory duties.
 - a. In relation to the *Privacy Act* (the “*Privacy Act*”) request #1 (the “**Privacy Act Request #1**”), dated March 11, 2026, it was explicitly conceded by Mr. Ball that the pertinent data repositories would remain unsearched (see: **Tab #6**; page 185). This request formally demanded foundational metadata, stipulating that a mere “live CPIC search” was jurisprudentially insufficient, and mandated the extraction of offline database trails.
 - b. Pertaining to the *ATIA* request #2 (the “**ATIA Request #2**”), it was declared by Mr. Mathew that the requisite records “could not be located,” a manifestation incontrovertibly substantiating that no **Office of Primary Interest** was ever commissioned to execute the requisite search methodologies (see: **Tab #8**; page 210).
 - c. The internal organizational paradigm of the RCMP regarding document “control” is profoundly erroneous; as a matter of statutory interpretation, control is vested inextricably within the governmental institution (the “**Institution**”) as an indivisible statutory entity, not within its fragmented operational subdivisions (see: **Tab #23**; page 762).
 - d. As meticulously documented within Tabs 35 and 39 (see: **Tab #35**; page 1210) and (see: **Tab #39**; page 1350), a deliberate misrepresentation was perpetuated by Ms. Beaudoin, wherein it was erroneously averred that “clarification” emanated from the **Office of Primary Interest**. It is established that this correspondence was, in actuality, generated by Ms. Maggie Von Fur-Muehlen, a newly appointed administrative functionary currently transitioning from the Ottawa hospitality sector (specifically, the commercial establishments Allium and Brassica) (see: **Tab #39**; page 1355).
 - e. This documented misrepresentation was strategically deployed to circumvent the assignment of the statutory access requests to the specialized technical divisions—specifically the Specialized Policing Services (the “**SPS**”)—which are solely equipped to execute sophisticated digital forensic searches and potential seizures (see: **Tab #39**; page 1358).
 - f. An egregious administrative circumlocution, colloquially characterized as a “royal runaround,” has been systematically inflicted upon the Applicant, characterized by institutional stonewalling and the deliberate non-assignment of access requests under both the *Privacy Act* and the *ATIA* (see: **Tab #41**; page 1382).
 - g. This institutional recalcitrance encapsulates the figurative opening of a Pandora’s box (the “**Pandora’s Box**”)—a contemporary labyrinth of systemic irregularities—wherein the proper assignment to the correct data

repository would inevitably unearth systemic anomalies, including algorithmic document manipulation, that the RCMP has actively sought to obfuscate (see: **Tab #15**; page 480).

4. Such unprecedented institutional failures necessitate the submission of these supplemental written representations. This exigency is birthed not through any fault or procedural misstep by the Applicant, but solely because a structural abdication of statutory obligations has been effectuated by the RCMP (see: **Tab #31**; page 1060). When tasking protocols suffer from such deliberate administrative misdirection, the **OPI** model ceases to be a mechanism of transparent retrieval and is transmuted into an instrument of systemic evasion, effectively insulating *ultra vires* state action from civilian oversight. It may be conceptually advanced by an opposing, assuming arguendo, interlocutor that the aforementioned administrative failures constitute mere procedural irregularities, thereby invoking the doctrine of a “deemed refusal” rather than an absolute loss of jurisdiction. Such a hypothesis must be vigorously repudiated. Where an administrative body actively circumvents its enabling statute via misrepresentation—such as fabricating the involvement of an **Office of Primary Interest** or deliberately misdirecting a request to a policy unit devoid of technical capability—the resultant act fundamentally contravenes the explicit mandates of the *ATIA* and *Privacy Act*. Pursuant to administrative law principles, a direct contravention of a statutory duty by way of institutional subterfuge does not merely breed an irregularity; it manifests as a nullity (the “**Nullity**”) *ab initio*. The maxim *fraus et jus nunquam cohabitant* (fraud and justice never dwell together) dictates that decisions anchored in misrepresentation are void, stripping the RCMP of any deference and mandating direct judicial intervention (see: **Tab #28**; page 930).

II. URGENCY AND THE NEED FOR IMMEDIATE RELIEF

A. The Court’s Institutional Integrity and the Ouster of Judicial Review

9. A direct and unambiguous affront to the supervisory jurisdiction of the Federal Court is manifested by the RCMP’s recalcitrant refusal to participate in the current proceedings, its refusal to adjudicate statutory decisions mandated by the *Privacy Act* and *ATIA*, and its obstinate refusal to compile and transmit the Certified Tribunal Record (see: **Tab #2**; page 48). Judicial review is inherently a record-based proceeding, an unassailable constitutional tenet recently reaffirmed by the Supreme Court of Canada in *Canada (Minister of Citizenship and Immigration) v. Vavilov* (the “*Vavilov Decision*”) (see: 210 citations therein). By unilaterally withholding the Certified Tribunal Record and failing to file a formal objection under *Rule 318(2)*, the RCMP has purposefully engineered an evidentiary vacuum. Relying upon the constitutional imperatives established in *Crevier v. Attorney General of Québec* (the “*Crevier Decision*”) (see: **Tab #25**; page 825), it is submitted that a public authority cannot utilize administrative stonewalling to functionally shield itself from the superintending purview of the superior courts. Such actions constitute an impermissible and unconstitutional functional ouster of judicial review. Should judgment be reserved while the Respondents are permitted to linger in perpetual default, the deliberate non-compliance of the RCMP is, *ipso facto*, legitimized and rewarded. The immediate promulgation of judicial relief is imperatively required to vehemently reassert the supremacy of the Honourable Court and to forestall the pernicious erosion of public confidence in the administration of justice. *Nemo commodum capere potest ex sua injuria propria* (no one can derive an advantage from his own wrong); the RCMP must not be permitted to weaponize its procedural default to frustrate the Applicant’s substantive rights.

III. IRREPARABLE HARM AND SPOILIATION RISK

A. Volatile Digital Evidence and the Illusion of the Presentation Layer

13. The preservation of highly volatile digital evidence (the “**Volatile Digital Evidence**”) is actively sought by the Applicant (see: **Tab #11**; page 305). To fully comprehend the systemic failures at bar, the Honourable Court must distinguish between the front-end presentation layer of law enforcement databases and the back-end mathematical architecture where immutable forensic artifacts reside. When a routine live query is executed, it interacts exclusively with the Canadian Police Information Centre (the “**CPIC**”) Graphical User Interface (the “**GUI**”) (see: **Tab #11**; page 308). This presentation layer merely reflects the sanitized, operational status of a file. It cannot expose historical data manipulation; it merely parrots the manipulated data back to the user.

14. Consequently, the corpus of digital material urgently sought encompasses the foundational architecture natively housing the records, *inter alia*:
- a. foundational metadata extracted from the CPIC infrastructure (the “**CPIC Foundational Metadata**”) (see: **Tab #11**; page 310);
 - b. offline historical database telemetry and systemic logs (see: **Tab #12**; page 340);
 - c. systemic command inputs, explicitly including ADD, MODIFY, CLEAR, and CANCEL keystroke directives residing within Personal Information Bank RCMP PPU 005 (the “**PPU 005**”) (see: **Tab #14**; page 420);
 - d. raw binary and hexadecimal memory dumps, which contain critical cryptographic audit trails (see: **Tab #14**; page 425);
 - e. Originating Agency Identifier codes (the “**ORI Codes**”), which confirm the exact municipal, provincial, or federal police division that physically inputted the data;
 - f. Hardware and Terminal Metadata, including Media Access Control and Internet Protocol network logs (the “**MAC/IP Logs**”); and
 - g. overarching systemic ingestion trails (see: **Tab #15**; page 475).
15. The aforementioned digital records are continuously subjected to an imminent peril of destruction, propelled by:
- a. automated, algorithmic overwrite protocols;
 - b. routine, chronologically-triggered purges;
 - c. sophisticated archiving cycles;
 - d. digital cleansing and sanitation processes; and
 - e. vector-flattening anomalies, specifically associated with enterprise-level document manipulation software such as the GrapeCity Documents PDF SDK architecture (see: **Tab #16**; page 505).
16. It is a technological certainty that once overwritten or systematically purged, the reconstruction of these critical records is rendered an absolute impossibility. Consequently, the jurisdictional capacity of the Court to fashion meaningful and efficacious relief would be permanently and irrevocably eviscerated.

B. Algorithmic Disfigurement, the GrapeCity/Mescius SDK, and the Annihilation of Judicial Acta

17. The technological modality through which state actors can alter judicial realities without leaving an immediate trace on the front-end GUI involves the exploitation of enterprise-level software, specifically the GrapeCity Documents PDF library (subsequently developed by Mescius) (see: **Tab #16**; page 510). Technical analysis confirms this software possesses extensive capabilities to handle, modify, and strip AcroForm fields, validate or invalidate digital certificates, and apply customized binary data to a signature line. If an offending state actor utilizes this software to “flatten” a digitally signed judicial PDF, it can intentionally eradicate the transparent electronic image signature of the authorizing judicial officer (see: **Tab #16**; page 515). Furthermore, this algorithmic flattening process can mutate the bounding box vectors, leaving behind anomalous metadata artifacts. The Applicant specifically identifies the “DOC-6507 vector-collapse bug,” which resulted in the highly anomalous appearance of the letters “CL (M)” in place of the authentic signature of Chief Justice Geoffrey B. Morawetz (see: **Tab #15**; page 480). Only the raw hexadecimal mainframe dumps from CPIC can isolate the exact ORI Code and MAC Address that initiated the fraudulent MODIFY or ADD command for the corrupted instrument.

C. The “False Information Package” Nullity and *Landreville*

19. The ultimate consequence of the RCMP's refusal to accurately task technical **OPI**'s is the systemic shielding of an absolute jurisdictional nullity. The Applicant's evidentiary record meticulously deconstructs a “False Information Package” (associated with RCMP Police Case ID: 457197) (see: **Tab #18**; page 550) which contains over forty-three (43) distinct structural and statutory discrepancies when measured against a standardized *Criminal Code*

Form 2 Information package.

20. Most fatally, the RCMP package completely omits Mandatory Page 4, containing the statutory attestation, the judicial-authorization block, the signature of the Justice of the Peace or Judge, and the Crown election (see: **Tab #9**; page 238-24). Without this foundational page, no Information was legally sworn under sections 507 and 508 of the *Criminal Code*, no judicial officer received it *de jure*, and no prosecution could lawfully commence. Furthermore, the purported “Warrant in the First Instance” on Page 3 lacks the standardized official template footers and contains absolutely zero judicial signatures—neither wet ink nor cryptographic (see: **Tab #18**; page 553).
21. Pursuant to the supreme governing principles established in *Landreville v. Town of Boucherville* (the “*Landreville Decision*”) (see: **Tab #22**; page 710), fraud, bad faith, and synthetic document fabrication unravel everything they touch. The filing of a digitally mutilated, unsigned, and unsworn Information package renders the entire criminal proceeding a Nullity from the outset, constituting the “fruit of the falsification tree.” Without the missing pages and the judicial signature, the coercive apparatus of the state operates entirely without lawful jurisdiction.

D. Ongoing Charter Prejudice and the Vindication of Reputation (Reference: Tab 2, Rule 317 Request) (see: Tab #2; page 45)

23. Absent unfettered access to the sequestered Judicial Acta and the CPIC Foundational Metadata, the capacity to vindicate fundamental rights in parallel juridical forums is entirely thwarted. The jurisprudential prejudice suffered is compounded exponentially with each passing diurnal cycle, obstructing the fundamental right to clear one's nomenclature and standing.

E. The “Omniscient Custody and/or Control” Problem and the Death of “Originator Control”

24. A recurring administrative mechanism utilized by the RCMP to deflect ATIP requests involves the jurisdictional fallacy of “originator control”—the assertion that CPIC metadata constitutes the proprietary domain of external police syndicates, and therefore the federal institution lacks custody or control (see: **Tab #23**; page 755).
25. This posture is fundamentally eviscerated by the binding Information and Privacy Commissioner of Ontario decision, *Order MO-4542 (Halton Regional Police Services Board)* (see: **Tab #23**; page 760). Adjudicator Steven Faughnan ruled definitively that while a municipal police force has custody over its own internal local logs, it is legally and technologically fenced off from the broader systemic CPIC audit logs. A municipal agency cannot unilaterally audit the CPIC mainframe to view the searches of federal or inter-provincial actors.
26. The legal corollary is profound: because municipal agencies are technologically barred from accessing systemic cross-jurisdictional audit trails, the RCMP, as the sovereign host and administrator of the CPIC mainframe, possesses exclusive legal custody and control over the systemic offline metadata embedded within PPU 005 (see: **Tab #14**; page 422).
27. In the absence of an immediate and robust preservation mandate to secure this centralized data, a continuous and unrelenting exposure to irreparable harm is faced by the Applicant, encompassing:
 - a. the perilous risk of wrongful border detainment;
 - b. egregious misidentification by law enforcement apparatuses;
 - c. profound and indelible reputational degradation; and
 - d. the catastrophic potential for unlawful arrest predicated upon manipulated or falsified metadata (see: **Tab #18**; page 560).
28. These impending perils invariably satisfy the jurisprudential threshold for irreparable harm and required urgency to ensure an expeditious “bottom line ruling” with reasons to follow.

IV. PUBLIC INTEREST AND QUASI-CONSTITUTIONAL RIGHTS

A. Systemic Collapse of the ATIP Framework

29. The catastrophic systemic failures characterizing the RCMP's ATIP operations have been extensively chronicled in

the Information Commissioner's report to Parliament, entitled *Access at Issue: The need for leadership* (2020) (see: **Tab #31**; page 1050). The investigation exposed a system on the brink of collapse, driven fundamentally by defective **OPI** tasking and an entrenched culture of administrative complacency, documenting profound institutional dysfunction.ⁱⁱⁱ The circumstances permeating the current application serve as a quintessential, individualized manifestation of this documented systemic collapse.

B. Fiduciary Duties and the Public Interest Override (Section 8(2)(m))

31. The RCMP's status as the national custodian of CPIC data imposes fiduciary-like duties of honesty, verification, and transparency. The Applicant's motion details thirty-one (31) proactive duties triggered when the RCMP receives notice of potential falsification or jurisdictional irregularity, which explicitly require the RCMP to freeze the data environment and prevent algorithmic overwriting (see: **Tab #10**; page 280).
32. Most critically, the litigation seeks the judicial enforcement of section 8(2)(m) of the *Privacy Act*, which mandates that the Head of the Institution possesses explicit authority to disclose personal information where the public interest clearly outweighs any invasion of privacy. The algorithmic manipulation of a federal database to effectuate a fraudulent arrest warrant is not a personal grievance; it is a profound matter of urgent, pressing public interest (see: **Tab #6**; page 190). The total failure of the RCMP Commissioner to even consider this public interest override constitutes a reviewable abdication of statutory discretion.

C. Quasi-Constitutional Status of Access Rights

33. It is firmly established in Canadian jurisprudence that the *Privacy Act* and the *ATIA* occupy a quasi-constitutional echelon within the legislative hierarchy, as affirmed in *Dagg v. Canada (Minister of Finance)* (the "*Dagg Decision*") (see: **Tab #27**; page 880) and *Blank v. Canada (Minister of Justice)* (the "*Blank Decision*") (see: **Tab #29**; page 950). The deliberate abdication by the RCMP to execute its statutory decision-making mandates constitutes, therefore, an unlawful deprivation of entrenched quasi-constitutional rights.

V. FRESH EVIDENCE (TABS 39–42): LOSS OF JURISDICTION AND INSTITUTIONAL INTENT TO ABSTAIN FROM STATUTORY SEARCHES

35. The freshly adduced evidentiary materials, contained within Tabs 39 through 42 (see: **Tab #39**; page 1350), (see: **Tab #40**; page 1365), (see: **Tab #41**; page 1380), and (see: **Tab #42**; page 1395), incontrovertibly demonstrate the pathology of tasking failures across all three requests:
 - a. Regarding **Privacy Request P-2025-16999**: The ATIP Branch issued a notice unilaterally taking an additional 30-day extension under section 15(a)(i), claiming "unreasonable interference with operations." However, a localized request for four discrete lines of metadata requires mere milliseconds of computational exertion. Ultimately, the ATIP operator ignored the demand for an offline search and executed a prohibited "Q PERS+" live GUI query (see: **Tab #6**; page 188). The institution simultaneously invoked section 22(1)(b) of the *Privacy Act* (protecting active federal investigations) while paradoxically claiming the records belonged exclusively to the Toronto Police Service—a devastating legal contradiction obliterating their "originator control" defense.
 - b. Regarding **ATIA Request A-2026-00761**: Seeking hexadecimal dumps and GrapeCity anomaly logs, the ATIP Branch deliberately misdirected the tasking to the "**CPIC**"—a policy and MOU administrative body devoid of technical extraction capabilities—rather than the correct **OPI**, the Specialized Policing Services (SPS) (see: **Tab #7**; page 195). When the **CPIC** predictably returned a NIL response, the ATIP Branch weaponized this ignorance, emailing the Applicant under the guise of requiring section 6 clarification, effectively shifting the burden of IT infrastructure mapping onto the civilian applicant to artificially stall the statutory clock.
 - c. Regarding **ATIA Request A-2026-01933**: Seeking records on the procurement of the GrapeCity SDK, the RCMP recorded the receipt date as May 8, 2026, artificially shaving a day off the statutory timeline despite objective tracking confirming delivery on May 7 (see: **Tab #8**; page 212). The RCMP subsequently failed to invoke a lawful section 9 extension, resulting in an absolute deemed refusal upon the expiry of the deadline on June 8, 2026.

36. The evidentiary matrix further substantiates that a misrepresentation was actively promulgated by Ms. Tina Beaudoin, asserting that “clarification” had been requisitioned from a designated **OPI**, when in reality, the correspondence was unilaterally generated by Ms. Maggie Von Fur-Muehlen, a newly acquired administrative subordinate possessing neither **OPI** designation nor technical acumen (see: **Tab #39**; page 1358).
37. At no temporal juncture did the RCMP assign any of the Applicant’s statutory access requests to any legitimate technical **Office of Primary Interest**. Consequently, the RCMP has irrevocably lost jurisdiction over the administration of all three access requests, rendering their administrative carriage a Nullity. An overarching institutional intent to categorically abstain from searching the Applicant’s requests is patently evident (see: **Tab #42**; page 1400).
38. As demonstrated by the statutory construction under section 29(1) (which does not afford complaint rights for a “refusal to search” and “discharge a ministerial duty”, the structural failure of an institution to assign a search or properly task an operational unit falls entirely outside the explicit remedial jurisdiction of the Commissioner, rendering the administrative exhaustion doctrine functionally sterile in these specific circumstances. Furthermore, by explicit reference to the administrative handling of ATIA Request #1 and ATIA Request #2, it is effectively conceded by the Respondents that not only was there a complete absence of any search methodology deployed, but this systemic failure was the direct consequence of the RCMP ATIP Branch steadfastly refusing to assign or refer the requests to the requisite “**Office of Primary Interest**”.
An **Office of Primary Interest**, within the complex taxonomy of the RCMP, is defined as any specific division, detachment, branch, or unit that originally created, collected, or currently exercises operational custody and control over the records germane to a statutory access request. Given that the RCMP operates as a highly decentralized and multi-jurisdictional apparatus, its central ATIP Branch, domiciled in Ottawa, does not personally warehouse or actively search for operational records. Rather, the federal access regime relies upon a delegation model wherein the ATIP Branch acts strictly as an administrative coordinator, “tasking” the relevant **OPI**—the operational node closest to the subject matter—to locate, review, and supply those files.
When an internal RCMP unit is lawfully designated as the **OPI**, it is inexorably bound by several strict, non-delegable administrative and privacy duties:
 - i. **Record Retrieval:** The exhaustive search of all relevant local and systemic repositories, explicitly encompassing emails, complex electronic databases (such as the Police Reporting and Occurrence System), shared network drives, physical notebook entries, and electronic text messages.
 - ii. **Scoping and Deduplication:** The meticulous review of retrieved materials to ensure strict conformity with the parameters of the request and the systematic removal of identical duplicate records.
 - iii. **Voluminous Notifications:** The immediate alerting of the central ATIP Branch should the volume of records prove exceptionally large or necessitate a statutory extension to process
 - iv. **Breach Containment:** The immediate containment of any discovered privacy breach within the unit, the securing of compromised personal data, the notification of privacy officials, and the implementation of preventative mitigation measures.
39. Depending on the granular specifics of a request, the ATIP Branch must surgically task the correct operational entity, such as: Federal Policing (tasked for records involving national security, financial crime, or transnational organized crime); Local Detachments or Divisions (tasked for specific localized incidents, highway traffic monitoring, or municipal/provincial contract policing operations); or Human Resources (tasked for internal operational requests involving employee codes of conduct, member performance evaluations, or internal training histories). The RCMP’s deliberate failure to engage this established **OPI** framework fundamentally eviscerates the procedural legitimacy of their responses and precludes any meaningful resolution through standard administrative channels.

VI. THE FRAUDULENT MISREPRESENTATIONS EFFECTUATED ON JUNE 25, 2026 (TABS 35 AND 39)

39. The Honourable Court’s attention is singularly and emphatically directed to the egregious and legally fatal

misrepresentations promulgated by Ms. Tina Beaudoin on the specific date of June 25, 2026. As meticulously chronicled within the evidentiary record (see: **Tab #35**; page 1210) and (see: **Tab #39**; page 1350), a calculated institutional subterfuge was orchestrated to frustrate the Applicant's statutory access rights under the guise of an administrative necessity for "clarification."

40. It was explicitly, yet falsely, represented to the Applicant by Ms. Beaudoin that the purported demand for contextual clarification had been initiated and requisitioned directly by a technically competent **Office of Primary Interest**. This representation is incontrovertibly exposed by the documentary evidence as a synthetic fabrication. The evidentiary matrix unequivocally demonstrates that the correspondence in question was, in verity, unilaterally authored by Ms. Maggie Von Fur-Muehlen, a newly appointed administrative subordinate whose recent professional pedigree is entirely rooted within the Ottawa hospitality and culinary sector, specifically encompassing the commercial dining establishments Allium and Brassica (see: **Tab #39**; page 1355).
41. Ms. Von Fur-Muehlen possesses absolutely zero institutional designation as an **Office of Primary Interest**, nor is she imbued with the sophisticated digital forensic acumen requisite for the execution of complex CPIC offline data extractions or the isolation of hexadecimal memory dumps. The deliberate conflation of an administrative functionary with a specialized technical **Office of Primary Interest** constitutes a manifest, deliberate, and highly deceitful misrepresentation.
42. Furthermore, the internal administrative unit invoked as a shield—the CPIC—functions exclusively as a policy and Memorandum of Understanding (MOU) administrative body. It is empirically documented that the **CPIC** is utterly devoid of the requisite technical infrastructure or jurisdictional mandate to execute the requested data extractions (see: **Tab #35**; page 1180). By deliberately misdirecting the statutory tasking to an operationally incapable entity and subsequently weaponizing its predictable inability to produce responsive records as a pretext to halt the statutory clock, the RCMP Access to Information and Privacy Branch operated in flagrant *mala fides*.
43. The severity of this institutional deception is magnified exponentially by the professional standing of Ms. Tina Beaudoin, who operates not as a nascent clerk, but as a National Team Leader within the RCMP ATIP Branch. The strategic deployment of Ms. Von Fur-Muehlen—a subordinate entirely unequipped to navigate complex CPIC architecture—by a National Team Leader confirms that this was a sanctioned, systemic maneuver designed to orchestrate a predetermined failure.
44. Flowing from this unassailable premise, it is a deductive certainty that there was never a scintilla of probability that the Applicant would receive any of the requested Personal Information under the *Privacy Act* request of March 11, 2026, nor the statutory Records sought under the subsequent *ATIA* requests of April and May 2026. The administrative process was a sham *ab initio*, rendering the RCMP's administrative jurisdiction functionally extinguished and exposing an egregious abuse of process *intra* the ongoing Federal Court proceeding (*McLean v. RCMP*). Governed by the supreme and unyielding legal maxim *fraus omnia corrumpit* (fraud vitiates everything), these calculated misrepresentations transcend mere procedural irregularity. They crystallize an absolute jurisdictional nullity, demonstrating a concerted, systemic institutional intent to permanently abstain from fulfilling mandatory statutory duties. Such contumacious conduct decisively strips the Respondents of any presumption of regularity, thereby extinguishing any entitlement to administrative deference and compelling immediate structural intervention by this Honourable Court.

VII. ADVERSE INFERENCES DERIVED FROM FRESH EVIDENCE (TAB 40) AND THE ACUTE ESCALATION OF URGENCY

45. The newly adduced evidence contained within Tab 40 further illuminates the institutional stratagems deployed to evade statutory scrutiny, specifically concerning highly suspicious executive personnel transitions occurring synchronically with the contumacious refusal to search. The evidentiary record reveals the following chronological anomalies:
 - a. The abrupt retirement of Mr. Derek Santosuosso on May 1, 2026, occurring a mere three (3) diurnal cycles subsequent to the April 27, 2026 Non-Search Decision formally promulgated by Mr. Jeffrey Ball; and
 - b. The immediate installation of Mr. Richard Burchill as the interim acting RCMP Technical Operations Director

VIII. THE DECENTRALIZED ARCHITECTURE OF EVASION AND THE MESCIUS/GRAPECITY EXIGENCY

49. An exhaustive analysis of the RCMP's institutional architecture further illuminates the acute, existential urgency underpinning the requested preservation orders. The framework of federal information retrieval is fundamentally defined by an inherent, structural tension between centralized statutory accountability and a highly decentralized operational custody model. The RCMP maintains a vastly distributed organizational apparatus, encompassing over seven hundred (700) detachments, intricate inter-agency partnerships, and specialized directorates operating across one hundred and fifty (150) communities and six hundred (600) Indigenous jurisdictions.
50. Within this sprawling, multi-jurisdictional labyrinth, the Volatile Digital Evidence is not sequestered within a single, static repository; rather, it is dispersed across a highly complex, decentralized network of local and systemic servers. The urgency of judicial intervention is therefore radically amplified. The longer the central ATIP Branch contumaciously refuses to execute its mandatory statutory tasking to the technically competent **Office of Primary Interest**, the more mathematically certain it becomes that localized, algorithmic overwrite protocols will permanently sanitize these disparate network nodes.
51. This structural peril is compounded exponentially by the specific, enterprise-level capabilities of the document manipulation software identified within the evidentiary record. Technical documentation pertaining to the GrapeCity Documents PDF library (presently developed by Mescius) unequivocally confirms the software's advanced capacity to digitally manipulate both *TimeStampProperties* and *SignatureProperties*.^v

IX. JURISPRUDENTIAL REINFORCEMENT OF INSTITUTIONAL NULLITY AND THE DUTY TO ASSIST (TAB 27)

54. The jurisprudential architecture underpinning this overarching Application is unequivocally fortified by the apex authorities meticulously assembled within the evidentiary record. The Supreme Court of Canada has firmly delineated the inviolable boundaries of the institutional “duty to assist” and the severe jurisdictional consequences of statutory evasion.
55. As enunciated by the Supreme Court in *Canada (Information Commissioner) v. Canada (Minister of National Defence)*, 2011 SCC 25 (see: **Tab #27**; page 896), the statutory duty to assist legally commands an institution to execute meaningful, good-faith efforts to locate responsive records. The RCMP's contumacious refusal to task a competent technical **Office of Primary Interest**, compounded by its subsequent issuance of a synthetic “NIL” response, constitutes a flagrant abrogation of this supreme duty. Furthermore, pursuant to the binding principles in *Canada (Information Commissioner) v. Canada (Commissioner of the RCMP)*, 2003 SCC 8 (see: **Tab #27**; page 896), the RCMP is absolutely precluded from issuing blanket refusals to search without tendering an exhaustive, legally sound statutory justification—an element conspicuously absent from the present factual matrix.
56. The juridical consequence of such deliberate, mandatory rule contraventions is absolute nullity, a principle resolutely affirmed by the appellate jurisprudence encapsulated in *König v. Hobza*, 2015 ONCA 885 (see: **Tab #27**; page 951). The Court conclusively established that strict adherence to mandatory procedural requirements is a prerequisite for validity; direct contravention ejects the proceeding entirely into the “realm of nullity.”

X. MANDAMUS, PROHIBITION, AND PRESERVATION

A. Mandamus

58. The stringent criteria for the issuance of a writ of *mandamus*, as elucidated in *Apotex Inc. v. Canada (Attorney General)* (the “*Apotex Decision*”) (see: **Tab #30**; page 990), are impeccably satisfied in relation to the egregious breaches formulated under the *Privacy Act*, the *ATIA*, and contemporaneously, *Rule 318*:
 - a. A clear, unequivocal legal right to the performance of the duty exists;
 - b. A mandatory, non-discretionary public duty is owed by the Respondents;

- c. A demonstrated and steadfast refusal to act has been established;
- d. No adequate or parallel alternative remedy exists at law; and
- e. An acute urgency necessitating immediate judicial intervention is glaringly apparent.

59. The issuance of an order of *mandamus* is absolutely indispensable to compel the RCMP to execute comprehensive searches and potential seizures, correctly tasked to the Specialized Policing Services (SPS), targeting:

- a. the CPIC Foundational Metadata;
- b. all offline historical database logs;
- c. all relevant hexadecimal memory dumps;
- d. intricate systemic audit trails;
- e. digital ingestion logs;
- f. the Personal Information Bank designation PPU 005 (the “**PPU 005**”) (see: **Tab #14**; page 420); and
- g. the entirety of internal institutional communications regarding the Applicant.

B. Prohibition

60. Concomitantly, a writ of prohibition must be forcefully rendered to legally enjoin the RCMP from:
- a. fraudulently invoking the doctrine of “originator control” to deflect statutory liability, as explicitly prohibited by *Order MO-4542* (see: **Tab #23**; page 760);
 - b. orchestrating unauthorized, covert searches and potential seizures outside the statutory framework; and
 - c. deceptively misdirecting the Applicant toward municipal police agencies to frustrate federal access rights.

C. Preservation

61. Immediate, robust preservation orders are required with absolute exigency to forestall the:
- a. irreversible deletion;
 - b. surreptitious alteration;
 - c. unauthorized digital migration;
 - d. intentional sanitization; and
 - e. technological obfuscation of both the CPIC infrastructure and PPU 005 metadata (see: **Tab #11**; page 315).

XI. EXPEDITED HEARING (RULE 385)

62. Pursuant to the discretionary parameters established within *Rule 385* of the *Federal Courts Rules* (the “*Rules*”), a formal declaration is sought by the Applicant to categorically expedite the overarching Application and contiguous motions, predicated upon:

- a. the extreme urgency inherent to the spoliation risk;
- b. the engagement and violation of quasi-constitutional statutory rights;
- c. the contumacious procedural default of the Respondents;
- d. the highly ephemeral and volatile nature of the evidentiary substratum; and
- e. the profound public interest in preserving the integrity of law enforcement data systems.

63. Furthermore, it is respectfully petitioned that the entirety of the evidentiary materials submitted in support of the interlocutory motions be judicially deemed as evidence comprising the substantive record at the final hearing of the Application, squarely within the purview of *Rule 373(4)* (see: **Tab #0**; page 9).

XII. RULE 374 — INAPPLICABILITY

64. The procedural strictures encapsulated within *Rule 374* are rendered entirely inapplicable to the present matrix due to the subsequent factors:

- a. the Respondents operate in a state of absolute procedural default;
- b. comprehensive legal notice has been effectuated;
- c. the architecture of the relief sought is decidedly structural and mandatory in orientation; and
- d. the drafted judicial order (the “**Draft Order**”) does not merely represent a transient interim injunction, but rather functions as a finalized interlocutory remedy imperative for the stabilization of the *status quo ante* (see: **Tab #0**; page 10).

XIII. REQUEST FOR A BOTTOM-LINE ENDORSEMENT

65. The Applicant most respectfully implores the Honourable Court to make and execute the Draft Order *instanter* today, with comprehensive judicial reasons to follow contemporaneously, anchored firmly upon the following legal foundations:
- a. The explicit jurisdictions conferred by *Rules 8, 55, 72.1, 73, and 318*;
 - b. The mechanisms for expedition codified within *Rule 385*;
 - c. The evidentiary carry-forward provisions delineated in *Rule 373(4)*;
 - d. The elevated, quasi-constitutional nature of the access rights herein engaged;
 - e. The extraordinarily urgent public interest, activating the *Privacy Act* section 8(2)(m) override;
 - f. The meticulously demonstrated risk of irreparable harm and vector-collapse data spoliation; and
 - g. The undeniable procedural default continuously exhibited by the Respondents.

XIV. CONCLUSION

66. The amalgamation of the RCMP’s refusal to participate in this adversarial process, its refusal to execute mandated data searches via correctly designated **OPIs**, its refusal to adjudicate statutory decisions, and its refusal to compile and transmit the Certified Tribunal Record (see: **Tab #2**; page 45), collectively manifests a functional and highly unconstitutional ouster of judicial review.
67. It is dictated by the principles of fundamental justice that the Court must intervene with utmost immediacy to:
- a. vigorously protect the structural integrity of its own judicial processes;
 - b. forestall the catastrophic spoliation of the Judicial Acta hidden within immutable binary ledgers;
 - c. robustly safeguard entrenched quasi-constitutional rights;
 - d. restore the parameters of legality to a rogue administrative process operating in *mala fides*; and
 - e. emphatically uphold the supremacy of the rule of law against synthetic documentary fabrication.
68. The execution of the requested structural relief falls squarely within the absolute ambit of the 13 Chief Justice Duties. By exercising the Self-Assignment Power and deploying **Her Ultimate Jurisdiction**, the Honourable Acting Chief Justice acts as the paramount Institutional Reputation Guardian and Constitutional Trust Steward. It is only through the impervious, courageous deployment of this Moral Authority that the Court can insulate its adjudicative independence from the Respondents’ administrative capture and arrest the ongoing, technologically facilitated spoliation of the Volatile Digital Evidence. The Applicant respectfully and urgently prays that the Honourable Court execute the Draft Order forthwith which will be separately fax filed to ensure that it is not left in any potential doldrums of the e-filing Federal Court of Canada Portal.

XV. UNDERTAKING UNDER RULE 373(2)

70. **Undertaking:** Pursuant to the strictures of *Rule 373(2)* of the *Federal Courts Rules*, I hereby undertake to abide by any order concerning damages caused by the granting or extension of the interlocutory relief sought herein, unless the Court orders otherwise.

SIGNATURE BLOCK

All of the foregoing supplemental representations, grounded in uncontroverted evidence and established jurisprudential doctrine, are hereby most respectfully and urgently submitted for the deliberate consideration, equitable adjudication, and inherent supervisory jurisdiction of this Honourable Court,

Kevin A. McLean (BA, JD, CIM)

Applicant,

Pro Se and *Pro Bono Publico* Toronto, Ontario

June 29, 2026

ⁱSee: Tab 0, page: II, V, X; Tab 10(A), page 263; Tab 13, page 425; page 441; Tab 26: page 883; Tab 27: page 889; Tab 30 (Letter to Chief Administrator), page 1057

ⁱⁱ 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 Decision”), see: Motion Record #2, page 961; 1057; 1192; 1200);

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.

ⁱⁱⁱa staggering ninety-two percent (92%) incidence rate of overdue statutory requests (see: Tab #31; page 1052);

an incomprehensible one thousand and nineteen percent (1,019%) inflation in year-over-year administrative delays for requests unanswered beyond 365 days (see: Tab #31; page 1053);
the systemic mis-tasking and erroneous delegation to non-applicable Offices of Primary Interest, resulting in requests endlessly “bouncing around” internal directorates (see: Tab #31; page 1055);
the generation of null (NIL) responses despite the empirical existence of responsive records, facilitated by the absence of an evergreen digital infrastructure map; and
the conspicuous absence of documented search-parameter methodologies.

^{iv} It may be postulated by the hypothetical opposing counsel or internal cogitations or ruminations by the Chief Justice of the Federal Court of Canada, that such executive transitions are routine, benign administrative occurrences devoid of juridical significance, and that no nefarious intent can be imputed from Mr. Santosuosso's retirement. Such an assertion must be fundamentally rejected. Within the highly scrutinized context of active Federal Court litigation concerning the suppression of volatile digital evidence, the sudden departure of a pivotal technical director immediately following a fiercely contested refusal to extract offline database logs triggers profound, non-obvious legal theories—namely, the Doctrine of Conscious Avoidance and the drawing of adverse inferences related to anticipatory spoliation. An administrative apparatus acting in good faith does not sequentially generate fraudulent “clarification” demands, issue steadfast refusals to search, and contemporaneously cycle out its chief technical custodian. This chronological nexus suggests a deliberate engineering of “plausible deniability,” designed to erect a bureaucratic firewall wherein the incoming interim director (Mr. Burchill) can profess ignorance of antecedent tasking failures, thereby insulating the institution from structural accountability.

The culmination of this fresh evidence underscores an absolute and terrifying urgency. The deployment of National Team Leaders to manufacture procedural delays, compounded by the strategic rotation of executive technical custodians, unequivocally demonstrates that the administrative machinery is actively working to dismantle the evidentiary trail. This undeniable abuse of process dictates that the spoliation of the Judicial Acta is not merely a theoretical risk, but an ongoing, active institutional objective. Thus, the invocation of immediate, ex parte-style preservation injunctions is not just warranted; it is the sole remaining mechanism to arrest the technological obliteration of the res.

^v The architectural reality that state actors possess access to Software Development Kit (SDK) tools capable of instantaneously altering historical digital timestamps, validating or invalidating cryptographic certificates, and mathematically flattening judicial signatures without leaving discernible traces upon the front-end Graphical User Interface escalates the risk of spoliation from a mere possibility to a catastrophic probability. The capacity for instantaneous, untraceable digital forgery utilizing these specific developer tools commands immediate structural intervention by the Honourable Court. It may be advanced by the Respondents that the sheer vastness of the RCMP's decentralized network renders the immediate preservation and retrieval of these specific hexadecimal logs an administrative impossibility. This defense of systemic enormity must be vigorously repudiated. The systemic complexity of an Institution cannot be weaponized as a shield against its own statutory obligations. The maxim *nemo allegans suam turpitudinem audiendus est* (no one alleging his own wrongdoing is to be heard) dictates that the RCMP cannot rely upon its own deliberate failure to properly maintain, govern, and task its decentralized databases as a justification for the denial of quasi-constitutional access rights. The immediate freezing of the CPIC digital environment and the targeted extraction of these specific systemic audit trails is the sole mechanism capable of preventing the irreversible, algorithmic eradication of the res.

☒ IPV (Intimate Partner Violence / Violence contre un partenaire intime) ☐ Replacement Information / Dénonciation de remplacement
☐ S (Impaired driving with substances / Conduite avec capacités affaiblies par des substances) ☐ V (Vessel / Bateau)

Arrest Date: _____ 15 month Flag: _____ 18 month Flag: _____
Date d'arrestation _____ Alerte à 15 mois (ddmmyy / jjmmaa) Alerte à 18 mois (ddmmyy / jjmmaa)
Sworn Date: 230924 15 month Flag: 241225 18 month Flag: 250326
Date d'assermentation _____ Alerte à 15 mois (ddmmyy / jjmmaa) Alerte à 18 mois (ddmmyy / jjmmaa)

4810 998 24 48129169

Information Number / N° de la dénonciation

NOTICE: Orders concerning this court Information relating to publication bans, non-disclosure/communication and French-language rights, are available on a separate page and **must** be followed.
AVIS: Les ordonnances liées à la présente dénonciation en ce qui a trait aux interdictions de publication, à la non-divulgaration ou à la non-communication et aux droits linguistiques des francophones figurent sur une page distincte. Ces ordonnances **doivent** être respectées.

Form 2 Information / Formule 2 Dénonciation

Sections 506, 508.1 and 788 of the Criminal Code / Articles 506, 508.1 et 788 du Code criminel

CANADA	Information of: Christyn Frugoni-Rojas	
PROVINCE OF ONTARIO	Dénonciation de :	
PROVINCE DE L'ONTARIO	of THE CITY OF TORONTO	Court Officer
TORONTO	de	(occupation / profession)
(Region / Région)	hereinafter called the informant / ci-après appelé(e) le dénonciateur	
	The informant says that he/she believes on reasonable grounds that	
	Le dénonciateur déclare qu'il a des motifs raisonnables de croire que	

(1) **MCLEAN, Kevin** DOB: 25 Mar. 1983
NFA, , ON

COUNT 1
Kevin MCLEAN

on or about the 22nd day of September in the year 2024 at the City of Toronto in the Toronto Region did, without lawful authority and knowing that another person, namely Nicole ARTOPOULOS, was harassed or recklessly as to whether that person was harassed, engage in repeatedly communicating with, either directly or indirectly, that person, and cause the said Nicole ARTOPOULOS to reasonably fear for personal safety, contrary to Section 264, subsection (2), clause (b) of the Criminal Code of Canada.

----- End of Charges/Counts -----

Declaration of Informant / Déclaration du dénonciateur

I declare that all matters contained in the Information are true to my knowledge and belief, pursuant to s. 508.1(2) of the *Criminal Code*.

Je soussigné(e) déclare tous les renseignements contenus dans la présente dénonciation sont, à ma connaissance, véridiques, en vertu de par. 508.1(2) du Code criminel.

Dated at **CITY of TORONTO** in the Province of Ontario, this **23rd** day of **SEPTEMBER**, 20 **24**
Fait à(au) *dans la province d'Ontario, ce* *jour de*

Declared / Déclaré

Christyn

Frugoni-

Rojas CL (M)

Digitally signed by
Christyn Frugoni-
Rojas CL (M)

Date: 2024.09.23
11:48:25 -04'00'

Digital Signature of Informant / Signature numérique du dénonciateur

Intake Court Endorsement

This Information is Accepted on its face.

Kevin MCLEAN:
Warrant In The First: Issue

Dated in the Province of Ontario, this 23rd day of September 2024.
Fait à/au dans la province de l'Ontario, ce 23 septembre 2024.



Justice of the Peace
Ontario Court
of Justice

Digitally signed by
George Jiri
Date:2024.09.23
12:59:50 -04'00'

This document has been digitally signed. / Ce document a été signé numériquement.

Arrest Date: _____	15 month Flag: _____	18 month Flag: _____
Date d'arrestation	Alerte à 15 mois (ddmmyy / jjmmaa)	Alerte à 18 mois (ddmmyy / jjmmaa)
Sworn Date: 230924	15 month Flag: 241225	18 month Flag: 250326
Date d'assermentation	Alerte à 15 mois (ddmmyy / jjmmaa)	Alerte à 18 mois (ddmmyy / jjmmaa)

4810 998 24 48129169

Information Number / N° de la dénonciation

☐ **Accused notified court under s. 530(3)**
Tribunal avisé par l'accusé en vertu de l'art. 530(3)

☐ **Designation Filed**
Désignation déposée

☐ **Interpreter Required**
Interprète requis

Date Date	Accused Accusé	Adjournment Date Date d'ajournement	Adjournment Details Détails sur l'ajournement	Designation Désignation	Counsel As Agent Avocat mandataire	Fails to appear Omet de comparaître	Bench Warrant Mandat d'arrêt	Discretion Discretion	Certificate of Default Certificat de défaut
03 Oct 2024	MCLEAN, KEVIN	13 Nov 2024	Toronto-OCJ-T-10 Armoury St - 204 @ 2:00 PM, FA, VI, ACP - Warrant in the First Executed						
13 Nov 2024	MCLEAN, KEVIN	18 Dec 2024	Toronto-OCJ-T-10 Armoury St - 204 @ 2:00 PM, ST, VI, ACP - - DISC BW			X	X	X	
18 Dec 2024	MCLEAN, KEVIN	19 Mar 2025	Toronto-OCJ-T-10 Armoury St - 204 @ 2:00 PM, ST, VI, ACP - -11b waived - - DISC BW Rescinded						
19 Mar 2025	MCLEAN, KEVIN	16 Apr 2025	Toronto-OCJ-T-10 Armoury St - 204 @ 2:00 PM, ST, VI, APN - - DISC BW			X	X	X	
16 Apr 2025	MCLEAN, KEVIN	14 May 2025	Toronto-OCJ-T-10 Armoury St - 204 @ 2:00 PM, ST, VI, ACP - - DISC BW Rescinded						
14 May 2025	MCLEAN, KEVIN	11 Jun 2025	Toronto-OCJ-T-10 Armoury St - 702 @ 2:00 PM, ST, VI, ACP						

Date Date	Clerk Greffier	Crown Couronne	For the Accused Pour l'accusé	Justice's Initials Initiales du juge
03 Oct 2024	Henriquez, Michael	NA	NP, NA, NOR	DJ
13 Nov 2024	Nurali, Saira	Pashang, Sia	NP, NP (Acc appeared in triage), NRC	TC
18 Dec 2024	Barna, Elizabeth	Dimiskovska, Andrea	AA, AA, VI, Self-Rep , NRC	JG
19 Mar 2025	Weisemberg, Iara	Laws, Jennifer	NP, NRC	JR
16 Apr 2025	Berhane, Aron	Dimiskovska, Andrea	AA, Self-Rep, NRC	BS
14 May 2025	Booth, Catherine	Laws, Jennifer	AA, Self-Rep, NRC	BS

☐ **At Bail Review date**
À la révision de l'ordonnance
de détention, datée du

☐ **Original Order
Confirmed**
Ordonnance originale
Confirmée

☐ **New Order
Made**
Nouvelle
ordonnance
rendue

☐ **Gladue Report
Requested**
Rapport Gladue
demandé

(date / date)

[illegible]

Information No. / N° de la dénonciation					
Return Date / Date à laquelle le document est rapporté _____ , 20____					
INFORMATION Against / DÉNONCIATION visant					
Address / Adresse 					
CHARGE / ACCUSATION 					
Refer to front page for further counts / Reportez-vous à la première page pour plus de chefs					
FOR ADMINISTRATIVE PURPOSES ONLY À DES FINS ADMINISTRATIVES SEULEMENT					
☐ Summons Sommission		☐ Show Cause Audience de justification		☐ Warrant 1 st Mandat en 1 ^{re} instance	
☐ Replacement Information / Dénonciation de remplacement					
☐ Reportable M.V. Offence (H.T.A. 199) Infraction V.M. à déclarer (Code de la route 199)		C.V.O.R. No (Commercial Vehicles Only) Numéro C.I.U.V.U. (véhicules utilitaires seulement)			
Sex Sexe	Birth Date / Date de naissance Day / Jour Month / Mois Year / Année	Was defendant owner? La partie défenderesse était-elle propriétaire? ☐ Yes / Oui ☐ No / Non			
Driver's Licence Number / Numéro du permis de conduire					
Plate No. / Numéro de plaque		☐ Involves a Collision Infraction reliée à un accident			
Informant Dénonciateur					
Deemed Sworn /Affirmed Date Réputée être déclarée sous serment/affirmée solennellement le		Date of Arrest Date de l'arrestation			
Officer / Agent de police				No. / N°	
Police Agency / Service de police				Div. / Dist.	
Occurrence Number / N° d'incident					
Courtroom / Salle d'audience					
At / À(Au)					

Information No. / N° de la dénonciation					
Return Date / Date à laquelle le document est rapporté _____, 20__					
INFORMATION Against / DÉNONCIATION visant					
Address / Adresse 					
CHARGE / ACCUSATION 					
Refer to front page for further counts / Reportez-vous à la première page pour plus de chefs d'accusation					
FOR ADMINISTRATIVE PURPOSES ONLY À DES FINS ADMINISTRATIVES SEULEMENT					
☐ Summons Sommission		☐ Show Cause Audience de justification		☐ Warrant 1 st Mandat en 1 ^{re} instance	
☐ Replacement Information / Dénonciation de remplacement					
☐ Reportable M.V. Offence (H.T.A. 199) Infraction V.M. à déclarer (Code de la route 199)		C.V.O.R. No (Commercial Vehicles Only) Numéro C.I.U.V.U. (véhicules utilitaires seulement)			
Sex Sexe	Birth Date / Date de naissance Day / Jour Month / Mois Year / Année	Was defendant owner? La partie défenderesse était-elle propriétaire? ☐ Yes / Oui ☐ No / Non			
Driver's Licence Number / Numéro du permis de conduire					
Plate No. / Numéro de plaque		☐ Involves a Collision Infraction reliée à un accident			
Informant Dénonciateur					
Deemed Sworn / Affirmed Date Réputée être déclarée sous serment/affirmée solennellement le		Date of Arrest Date de l'arrestation			
Officer / Agent de police				No. / N°	
Police Agency / Service de police				Div. / Dist.	
Occurrence Number / N° d'incident					
Courtroom / Salle d'audience					
At / À(Au)					