

FEDERAL COURT

BETWEEN:

KEVIN A. MCLEAN

Applicant

• and -

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

Respondents

APPLICANT’S WRITTEN REPRESENTATIONS – SUBMISSIONS (*AMPLIFIED WITH FRESH EVIDENCE PERTAINING TO THE THIRD NOTICE OF MOTION*) (JULY 21, 2026) (MULTI-PURPOSES AS SPEAKING NOTES/ORAL SUBMISSION NOTES FOR RETURNABLE DATE OF JULY 22 2026 IN OTTAWA)

Respectfully directed for his immediate consideration including hearing and deciding the same:

The Chief Justice of the Federal Court of Canada in The Honourable Justice Mr. Dinerⁱ

Ottawa, Ontario

Respectfully directed to any presiding motions judge for July 22, 2026, under the proviso that the Applicant’s unwavering position is that the Honourable Chief Justice of the Federal Court of Canada Mr. Diner must decide the same

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APPENDIX A: DOCUMENTARY EVIDENCE AND CORRESPONDENCE58

APPENDIX B: METADATA 2 GO - FORENSIC EXTRACTION REPORT**Error! Bookmark not defined.**

1. The SCC in *McLean v. Bradley*, 1878 CanLII 22 (SCC) as per Sir William Buell Richards, Knt., C.J., et al,

“When the Court has no jurisdiction of the cause, the whole proceeding is coram non judice, and actions will lie against the above mentioned parties without any regard to the precept or process, and in this case it is not necessary to obey one who is not judge of the cause.” Broom, L. M. 90, *Taylor v. Clemson*[29]. Factum a judice, quod ad officium jure non pertinet, ratum non est. “A plea of justification by a constable acting under the warrant of a justice will accordingly be bad, if it does not show that the justice had jurisdiction over the subject matter upon which it is granted.” *Taylor v. Clemson*[30]; Broom's Prac.[31]; Broom, L. M.[32]”

2. The SCC, again, in *Pong v. Quong*, 1927 CanLII 2 (SCC) as per Anglin C.J.C., found that when a judge went beyond his or her jurisdictional powers, he or she was Coram Non Judice. For sake of convenience, the SCC found therein: “

It was apparently desired that he should deal with issues as to the relationship of Pong and Quong, and determine the rights between them. Mr. Raney consented in some sort of form to that being done, but it would appear that his consent was given on the understanding and basis that the judge should deal with the matter as one within his jurisdiction under the overholding tenants provisions. It is perfectly manifest that he had no jurisdiction to do so—no jurisdiction subject to appeal; that he could entertain such collateral matter only either as persona designata or as arbitrator. That being so, the Appellate Division, when the case came before it on appeal from Judge Denton, must have taken the view, as Mr. Raney states, and as the subsequent proceedings bear out, that the judge had assumed a jurisdiction he did not possess under the overholding tenants provisions, and that as to the relations between Pong and Quong the matter was coram non judice. Mr. Raney's consent had been given subject to a condition which could not be fulfilled; in other words, he consented upon the condition that he would retain an effective right of appeal. On the appeal in the present action, the Appellate Division must have taken the view that the former proceeding was not binding as to the obligations of Pon

3. Justice Whyte Nowak had no jurisdiction, power or privilege to issue any Decision/Other Disposition upon which matters had already been decided without a section 51 of the Federal Courts Rules appeal of Associate Judge Mr. Crinson Decision/Other Disposition. Most axiomatically, she had no power and nor did the Federal Court of Canada have any jurisdiction to issue any direction in this form:



4. As such, the Justice Whyte Nowak July 2 Purported Direction (False Document) must be expunged from the Federal Court of Canada court record (Record Of Proceeding) in perpetuity as consequential relief of the declarations of invalidity, falsification of document, violations of the *Trademarks Act* et al. As such, neither the Applicant nor any person is required to obey such a false document, forgery and fictitious document, and to obey the same would be tantamount to complicity with fraud. The Applicant will not do so but this motion is brought not only for the Applicant and this McLean RCMP Proceeding but for the public interest to ensure that such conduct never happens again. No better judge to hear and decide the same than the newly appointed Primus Inter Pares of the Federal Court of Canada Chief Justice (The Honourable Mr. Justice Diner) who has been on the Federal Court of Canada technology committee for some time.
5. To suggest that the facts herein fit the law of a Chief Justice's case as cited in Baldovi (2016) would be axiomatic but the understatement, inside a courtroom in this country, of this century. The integrity of the Federal Court of Canada is at issue in the most serious and palpable of ways.

VOLUME #1(A)(I): INTRODUCTION

6. It is respectfully submitted that the third notice of motion (the “**Third Notice of Motion**”) delineates matters of profound institutional consequence, thereby necessitating immediate and expedited adjudication *in limine*. The integrity of the judicial process, administrative procedure, and adjudicative function has been fundamentally compromised by an unprecedented architecture of administrative malfeasance, thus compelling the apex supervisory intervention of this Honourable Court. As articulated in Herbert Broom's seminal compendium of legal maxims, *actus curiae neminem gravabit* (an act of the court shall prejudice no man); however, when the purported

act of the court is demonstrated to be an artifice, the resultant prejudice is absolute, rendering the impugned instrument an unequivocal nullity rather than a mere procedural irregularity.

7. The emergent evidentiary record, having been crystallized through rigorous forensic extraction of metadata, illuminates a highly coordinated and synthetic subversion of the adjudicative repository. It is categorically advanced that such circumstances transcend mere procedural irregularities; rather, they constitute a mathematically verifiable fraud perpetrated upon the tribunal, executed entirely beyond the authorized and statutorily prescribed boundaries of the Courts Administration Service.
8. By invoking the foundational equitable doctrine and maxim *ubi jus ibi remedium* (where there is a right, there is a remedy), it is averred that the systematic deprivation of procedural fairness—engineered through the clandestine fabrication of a spurious judicial instrument, specifically the fabricated directive bearing an unauthorized heraldic crest (the “**Fabricated Directive**”)—mandates the immediate, superseding intervention of the Acting Chief Justice. The preservation of the administration of justice inextricably dictates that any systemic subversion orchestrated to circumvent mandatory statutory gateways operates *ipso facto* to vitiate the foundational jurisdiction of the tribunal in its entirety. Such machinations render the consequential acts unequivocally *ultra vires* and subject to immediate expungement as absolute nullities. The perpetration of this metadata manipulation, originating from a file within the Tax Court of Canada wherein opposing counsel represents the Canada Revenue Agency and the Attorney General of Canada, constitutes an egregious affront to the institutional dignity of the Federal Court. It is axiomatic that the Federal Court derives its statutory genesis from section 101 of the *Constitution Act, 1867*. The technological subterfuge herein detailed must assuredly command the particularized scrutiny of the Honourable Chief Justice, given his esteemed tenure chairing both the Immigration Committee and the Technology Committee.
9. Historically, since its reorganization in 1971, the Federal Court—which formerly encompassed a trial and appeal division until dissolution in 2003—has utilized a strictly delimited heraldic identifier. Until the year 2007, the traditional Coat of Arms was employed; however, on December 10, 2007, the Canadian Heraldic Authority officially bestowed upon the Federal Court its unique Coat of Arms, serving as its primary ceremonial emblem. This specialized crest features highly specific symbolic elements, including a shield styled in black and gold to mirror the formal vestments of the judiciary, centrally displaying legal scrolls bound by a gold cord to represent

major jurisprudential foundations, including the *Canadian Charter of Rights and Freedoms*, constitutional texts, and international treaties. Furthermore, mythical winged sea caribous flank the shield, amalgamating caribou, raven, and salmon to symbolize nationwide jurisdiction across terrestrial, aerial, and maritime domains, standing upon a checkerboard pattern that honours the predecessor Exchequer Court of Canada. The crest incorporates the traditional scales of justice balanced beneath a stylized maple leaf, accompanied by the motto 'Droit, Equity, Admiralty', thereby encapsulating the bilingual and statutory mandates of the tribunal. The letters patent were formally gazetted on November 22, 2008, in Volume 142, page 2982 of the Canada Gazette. The emblem must be reproduced for comparative purposes infra:

[Image from Federal Court of Canada website: Federal Court of Canada logo since 2007]



10. While the traditional Coat of Arms of Canada has undergone stylistic transmutations over successive epochs, the foundational inscription affixed thereto has permanently remained *A Mari Usque Ad Mare*. Recognized as the official national motto of the dominion, translating to 'From Sea to Sea' in English and 'D'un océan à l'autre' in French, this phrase is derived from the Latin translation of Psalm 72:8, referencing the vast geographic expanse of the nation spanning the Atlantic and Pacific oceans.

VOLUME #1(B):THE PASTING AND COPYING FROM THE JUSTICE WHYTE NOWAK JULY 2 PURPORTED DIRECTION (FALSE DOCUMENT)

11. Within the July 2 purported direction attributed to Justice Whyte Nowak (the “**Impugned Direction**” or the “Justice Whyte Nowak July 2 Purported Direction (False Document)”), the heraldic emblem was manifestly

reproduced through crude technological superimposition. Forensic analysis demonstrates that an application denoted as PDF-XChange Editor, specifically version 10.7.1.399—which was subsequently released to the public domain on August 26, 2025—was utilized to execute this fabrication.

[Image: Coat of Arms logo since 1960's]

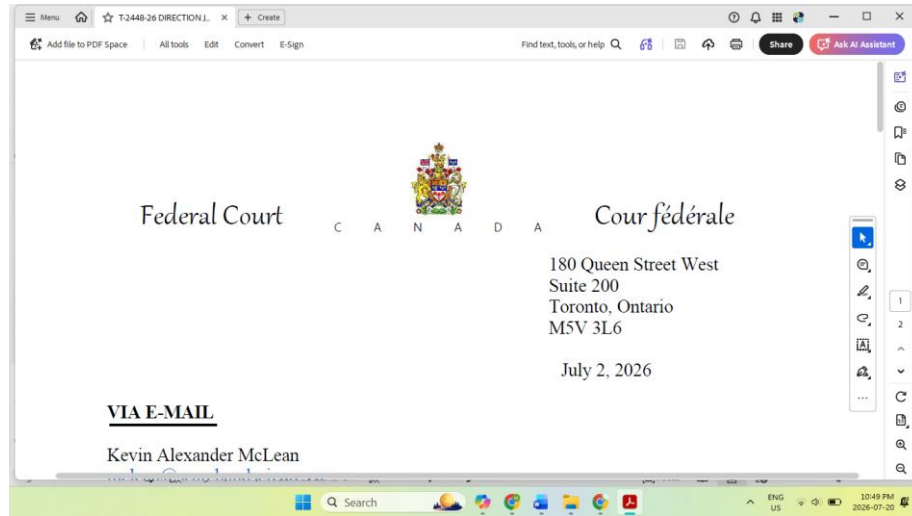


7. The rudimentary nature of the graphical reproduction may be extrapolated to the malfeasance of the impersonator having employed an antiquated software iteration, preceding the current technological standard by fourteen successive versions. As evidenced by the official version history and package repositories, the chronological release trajectory of the aforementioned software proceeded as follows:

Build Designation	Date of Release
Build 10.7.2.400	September 3, 2025
Build 10.7.3.401	September 23, 2025
Build 10.7.5.403	October 28, 2025
Build 10.7.6.404	November 20, 2025
Build 10.8.0.405	December 19, 2025
Build 10.8.2.407	January 8, 2026
Build 10.8.3.408	February 24, 2026
Build 10.8.4.409	February 24, 2026
Build 10.8.5.410	April 21, 2026
Build 11.0.0.0	May 14, 2026
Build 11.0.1.0	June 9, 2026

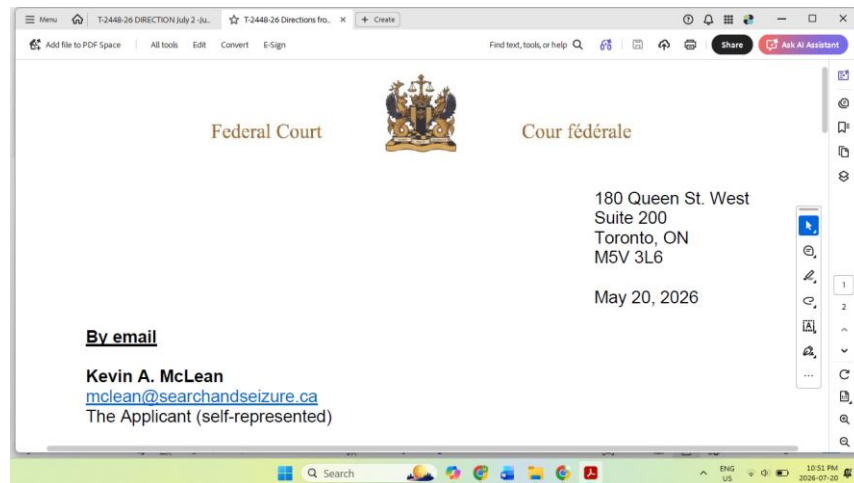
8. In addition to the aforementioned rudimentary rendering of the national Coat of Arms, the typographic representation of the Federal Court was concurrently subjected to material and conspicuous alteration. Such deviations represent a stark departure from the mandated graphical standards of the tribunal.

[Image: Top half of Justice Whyte Nowak July 2 Purported Direction (False Document)]

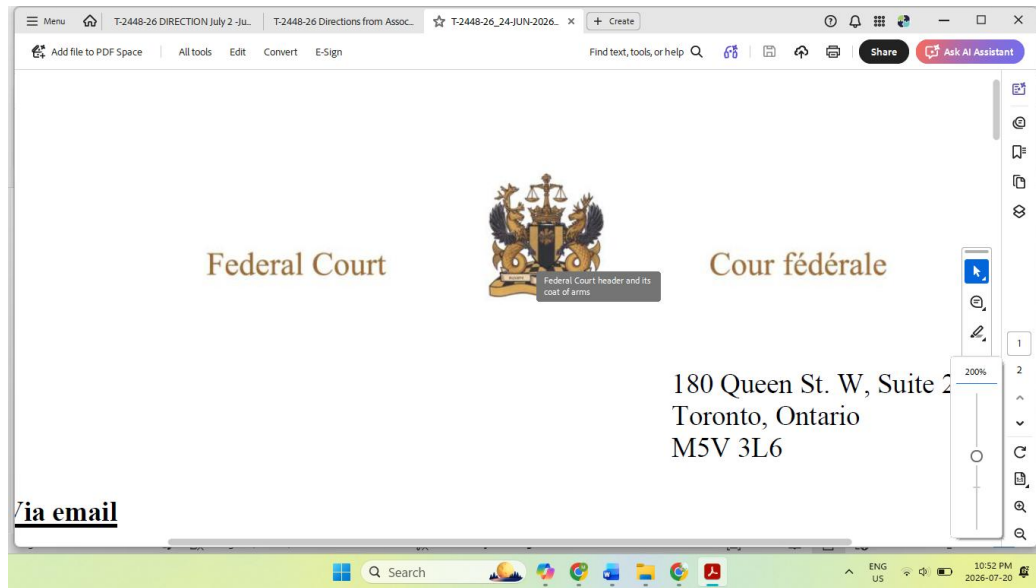


12. When juxtaposed against the authenticated decisions and other dispositions rendered by Associate Judge Cotter on May 20, 2026, and Associate Judge Crinson on June 24, 2026, the formatting discrepancies present themselves as remarkably conspicuous. The manifest divergence solidifies the conclusion that the document constitutes a fraudulent nullity rather than an administrative irregularity. This is noted infra:

[Image: Federal Court of Canada Associate Judge Mr. Cotter Decision/Other Disposition, May 20, 2026]



[Image: June 24, 2026, Associate Judge Mr. Crinson Decision/Other Disposition]



13. As consistently evidenced in authenticated dispositions of the tribunal, the national designation 'Canada' is strictly omitted from the header immediately following 'Federal Court'. Furthermore, an objective review of the formatting deficiencies within the Impugned Direction reveals that the institutional designations, specifically 'Federal Court' and 'Cour fédérale', remain unitalicized, thereby providing supplementary *prima facie* indicia of forgery. Under Broom's established legal doctrine of *omnia praesumuntur rite et solemniter esse acta* (all acts are presumed to have been done rightly and regularly), the presumption of regularity is definitively rebutted by these profound anomalies, rendering the instrument an absolute nullity, entirely devoid of legal force or effect.

VOLUME 2: THE CRYPTOGRAPHIC FORENSICS AND THE ANATOMY OF THE SUBVERSION

14. The foundational architecture of this systemic subversion is incontrovertibly unmasked by the cryptographic indicia embedded within the impugned instrument's hidden extensible metadata platform (the “XMP”) stream. It is noted that XMP constitutes an open-source technological framework, originally engineered by Adobe, which facilitates the direct embedment of descriptive data, or metadata, into a digital file.

Volume 2(A): The raw metadata Title

15. Forensic extraction reveals that the raw metadata title field incontrovertibly reads: “T-4313-25 direction.docx”.

Volume #2(A)(I): Metadata Title Field versus “File Name Field”

16. It is a trite technological proposition that the title field within a document's metadata remains wholly distinct and severable from the operational file name field, regardless of whether the instrument is formatted as a Microsoft Word document or a portable document format (the “PDF”) file.

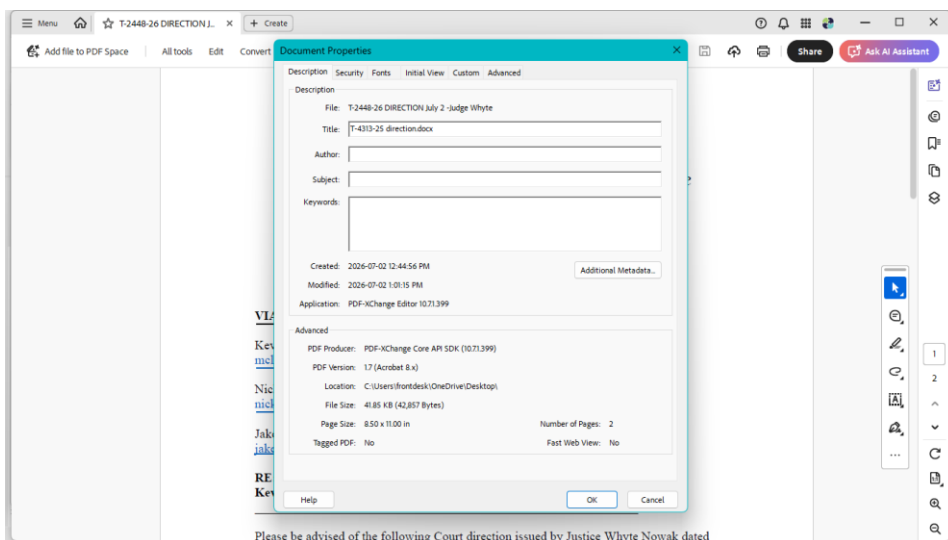
Volume #2(B): Commercial Manipulation Software

17. It is a fundamental operational reality of commercial manipulation software that the original source “Filename” is permanently inherited and embedded as the title.

Volume #2(B)(I): Can the filename be removed?

18. Such embedded metadata can theoretically be expunged, provided the digital instrument was not subjected to cryptographic locking, designated as read-only, or otherwise secured by access controls. Forensic examination dictates that the justice Whyte Nowak July 2 purported direction (the “**False Document**”) was notably devoid of such security measures. The following visual evidence unequivocally demonstrates this technological vulnerability:

[Image: Metadata of Justice Whyte Nowak July 2 Purported Direction (False Document)]



19. Within the file name field, the designation “July 2 Judge Whyte” was deliberately assigned to illustrate the forensic timeline and internal constitution of the False Document, thereby establishing the following irrefutable chronology:
- a. Created: July 2, 2026, at 12:44 p.m.;
 - b. Modified: July 2, 2026, at 1:01 p.m.;
 - c. Metadata title: “T-4313-25 direction”. It is of paramount significance to note that only a single procedural direction was ever issued in the matter of *Zekry v. Canada (Revenue Agency)*, bearing Court File No. T-4313-25, which was the June 16, 2026, direction rendered by the Associate Judge. Furthermore, such a direction would invariably be formalized in a PDF format, not a “.docx” format, notwithstanding its original oral issuance in the absence of the parties. The transposition of this specific file nomenclature serves as undeniable proof of unauthorized document cloning and manipulation.
20. In stark juxtaposition, the authenticated decisions and other dispositions rendered by Associate Judge Cotter and Associate Judge Crinson exhibit properly voided or blank metadata title fields. Moreover, the metadata authorship within those legitimate judicial instruments is appropriately attributed as follows: a. Author: Ms. Diane Lopez; and b. Author: CAS-SATJ (notwithstanding the formal signatory block at the document's terminus identifying Alice Prodan Gil, Senior Registry Officer).
21. The genesis of both aforementioned authenticated dispositions relied upon Microsoft Word at the first instance, with the subsequent PDF conversion effectuated legitimately through Microsoft® Word for Microsoft 365 as the designated PDF producer, entirely consistent with standard administrative protocols.

Volume #2(C): Email of July 2, 2026

22. The electronic correspondence transmitted on July 2, 2026, emanated from the generic Courts Administration Service decisions inbox, mirroring prior communications, albeit suspiciously bearing the correct header and logo in the email but not in the Justice Whyte Nowak July 2 Purported Direction (False Document):

[image: Federal Court of Canada logo from the email itself]



CAS-SATJ DECISIONS cas-satj-decisions@cas-satj.gc.ca
“mclean@searchandseizure.ca” <mclean@searchandseizure.ca>,
“nick.continelli@justice.gc.ca” <nick.continelli@justice.gc.ca>,
“jake.norris@justice.gc.ca” <jake.norris@justice.gc.ca>
cc:
R369_Toronto <R369_Toronto2@cas-satj.gc.ca>
date: Jul 2, 2026, 1:01 PM
subject: T-2448-26 Kevin Alexander McLean v. Royal Canadian Mounted Police

Thank you,

Maya-Jo Blake-Janniere

Registry Officer

Courts Administration Service, Toronto Local Office
Service administrative des tribunaux judiciaires, Bureau local de Toronto

23. A temporal analysis reveals a mathematically impossible convergence: within the exact minute the False Document underwent its final digital modification, it was concurrently dispatched from the generic tribunal address by Ms. Maya-Jo Blake-Janniere. Applying the maxim *res ipsa loquitur* (the thing speaks for itself), the precise chronological alignment necessitates that the transmission vehicle was pre-constructed. It is averred that the sender could not plausibly have been the final modifier of the False Document, yet mysteriously possessed the capability to disseminate the manipulated instrument within a maximum forty-five-second window, prior to the clock advancing to 1:02 p.m.
24. Compounding this impossibility, the False Document contained the following specific, manipulated heraldic representation:
- [Image: copied and pasted from the Justice Whyte Nowak July 2 Purported Direction (False Document) – Coat of Arms – not of the Federal Court of Canada]



25. Applying Herbert Broom's established maxim *falsus in uno, falsus in omnibus* (false in one thing, false in everything), the presence of this fraudulent crest within a document disseminated with such impossible speed irrevocably taints the entire instrument.
26. The inescapable extrapolation derived from these forensic facts is that the manipulation software (like a GrapeCity.PDF for Documents (version 6.0.2.0) (when at the time of November 2024 (when it was likely provided to TPS to file with the OCJ 10 Armoury Street Courthouse (the "Transferee Courthouse") the active version was: active and final version under the legacy naming convention was GrapeCity.Documents.Pdf version 7.2.3)) (nota bene: GrapeCity Documents for PDF version 6.0.2 was released on January 3, 2023) in the False Information Package (Criminal Code) (CCO-2-000-1) utilized for this fabrication was operated remotely, interfacing with the tribunal's electronic mail servers from an external location.
27. The temporal proximity of this malfeasance, occurring on the immediate diurnal sequel to the Canada Day statutory holiday (July 2, 2026), further evinces an orchestrated, extra-institutional fabrication. Under these circumstances, the document cannot be salvaged as a mere irregularity and operates *ipso facto* as an absolute nullity.
28. Simply put, the Justice Whyte Nowak July 2 Purported Direction (False Document) is a false document under the Criminal Code and beyond so it easily meets that the balance of probabilities standard. As such, it must be declared void ab initio, void, and of no force and effect on that ground alone. With no appeal under rule 51 of the Federal Courts Rules, Associate Judge Mr. Crinson Decision/Other Disposition remains binding, unappealed, unvaried and not subject to valid attack. Ergo, the Respondents are in default, without recourse but for seeking leave to file a section 51 of the Federal Courts Rules appeal of the Decision/Other Disposition, which falls under the prescribed definition of "Order", and it is now nearly a month since they received notice of the Order (Decision/Other

Disposition). It is now approximately three times the prescribed deadline to have filed and served a section 51 of the Federal Courts Rules appeal. The RCMP (Tribunal) is still required to transmit the CTR as that obligation operates independently of any participatory rights.

VOLUME 3: THE CORE API SDK PDF XCHANGE: DEVELOPER PRODUCT

29. The PDF-XChange Core API SDK (the “**Software Development Kit**”) constitutes an exclusive and highly specialized developer product. The utilization of such a sophisticated technological application is entirely superfluous for the routine administrative conversion of a Microsoft Word document to a portable document format (the “**PDF**”), as is uniformly and legitimately executed in all authenticated decisions and dispositions emanating from the Federal Court of Canada.

VOLUME #3(A): KEY CHARACTERISTICS

30. The Software Development Kit is defined by the following foundational technological characteristics: a. Purpose: It functions as a specialized framework engineered exclusively for the architecture and compilation of custom software solutions; b. Target Audience: Its distribution and operability are strictly delimited to professional software developers and programmers; c. Integration: It permits the programmatic embedment of PDF generation, viewing, and manipulation capabilities directly into proprietary applications; and d. Usage: It is technologically incapable of being executed as a standalone desktop application by standard commercial consumers.
31. The aforementioned Software Development Kit furnishes developers with the requisite libraries and application programming interfaces designed for the systemic creation and manipulation of PDF files. It is averred that Tracker Software Products (the “**Developer**”) has comprehensively terminated the general public dissemination of such software development kits. These specialized instruments are presently accessible exclusively to vetted and approved developers upon formal application, thereby heavily restricting procurement channels.
32. It is a matter of documented commercial record that the Developer officially ceased the retail distribution of its software development kits to the general populace on March 12, 2021.

VOLUME #3(B): KEY DETAILS OF THE TRANSITION DISCONTINUATION NOTICE:

33. The discontinuation of general availability was precipitated by a structured transition protocol, detailed as follows:
- a. Initial Notice: Notice regarding the planned discontinuation was disseminated to developers as early as March 2019, predicated upon documented abuses of licensing terms and the prohibitive financial and temporal burdens associated with sustained maintenance;
 - b. General Public Sales Ceased: On March 12, 2021, all software development kit product lines were comprehensively withdrawn from general release and direct public commercialization;
 - c. Approved Developer Model: Notwithstanding the blockade of standard public acquisition, the Developer continues to provision such products—inclusive of the Editor SDK, Core API, and Drivers SDK—strictly to approved entities, subject to rigorous vetting and authorization protocols administered by its corporate sales division; and
 - d. Legacy Support: Contractual obligations regarding existing developer agreements were preserved, ensuring operational updates solely for clients maintaining extended maintenance contracts.

VOLUME #3(C): XMP ARTIFACTS: CLONED

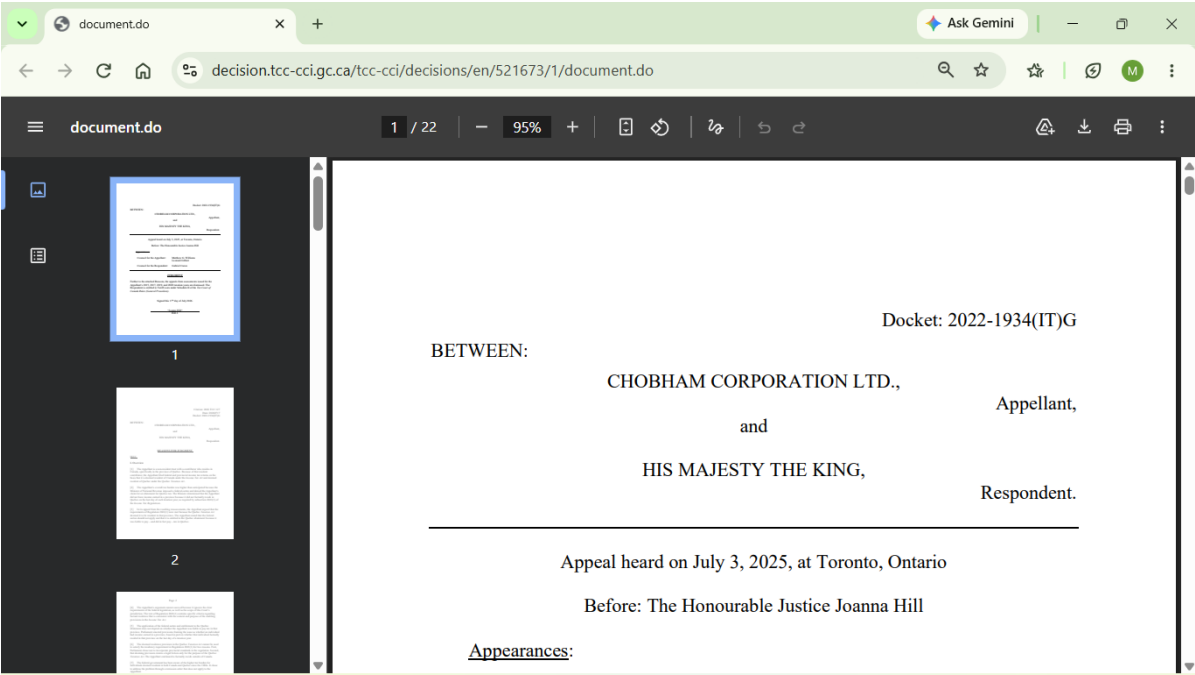
34. This ineradicable extensible metadata platform artifact definitively establishes that the impugned document, specifically the July 2 purported direction attributed to Justice Whyte Nowak (the “**False Document**”), was clandestinely and partially cloned from a disparate, antecedent, concurrent, or ongoing proceeding situated within the Tax Court of Canada, wherein the Canada Revenue Agency and the Attorney General of Canada are designated as respondents. Consequently, it operates *ipso facto* as an absolute nullity, having definitively not been natively generated for the docket in the matter at bar.

VOLUME #3(D): THE MOTIVE FOR WHY THE TAX COURT OF CANADA DOCUMENT WAS UTILIZED: BLANK COURT AND LOGO CANVAS

35. The calculated rationale underlying the illicit procurement and subsequent hijacking of a Tax Court of Canada template is manifestly discernible and technologically verifiable. Publicly disseminated jurisprudence and

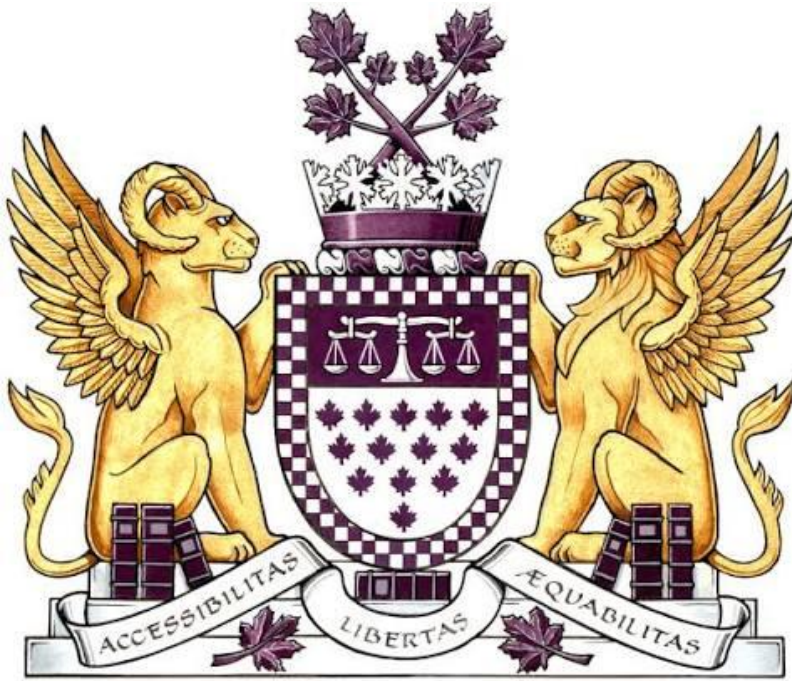
dispositions of the Tax Court of Canada structurally lack pre-printed visual heraldry, existing strictly as minimalist, text-only digital instruments. A recent disposition rendered by the Tax Court of Canada unequivocally demonstrates this structural formatting:

[Image: Tax Court of Canada recent decision involving Chobham Corporation Ltd. v. HMTK – 2026]



36. Furthermore, while the historical emblem of the Tax Court of Canada previously incorporated the traditional Coat of Arms, the tribunal underwent a formal rebranding in 2021, officially adopting the specific graphical identifier depicted *infra*:

[Image: Tax Court of Canada logo as of 2021]



37. This structural void—a “logo-less” vulnerability—presented a perfect blank canvas as it related to the absence of a logo and name of court. It empowered the external architect to completely bypass the insurmountable technical hurdle of cleanly erasing a complex, embedded vector graphic from a genuine Federal Court template, seamlessly facilitating the fraudulent superimposition of an unauthorized crest.
38. In essence, it was a learning from mistakes of yesteryear with the fraud, forgery, and falsification of the False Information Package (Criminal Code) in Fall of 2024:

[Images: False Information Package (Criminal Code) (CCO-2-000-1) x 3]

Menu Information Package 48. x Create

Add file to PDF Space All tools Edit Convert E-Sign Find text, tools, or help Share Ask AI Assistant

1P's (Violence / Partenaire intime) Violence / Partenaire intime
☐ 5 (Impaired driving with substances / Conduite avec capacités affaiblies par des substances) ☐ V (Vessel / Bateau)

Arrest Date: 15 month Flag: 18 month Flag: 4810 998 24 48129169
 Date d'arrestation: 15 mois (démmy / j'mme) 18 mois (démmy / j'mme) Information Number / N° de la dénonciation
 Sworn Date: 230204 15 month Flag: 241225 18 month Flag: 250205
 Date d'assementation: 15 mois (démmy / j'mme) 18 mois (démmy / j'mme)

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Form 2 Information / Formulaire 2 Dénonciation
 Sections 506, 508.1 and 788 of the Criminal Code / Articles 506, 508.1 et 788 du Code criminel

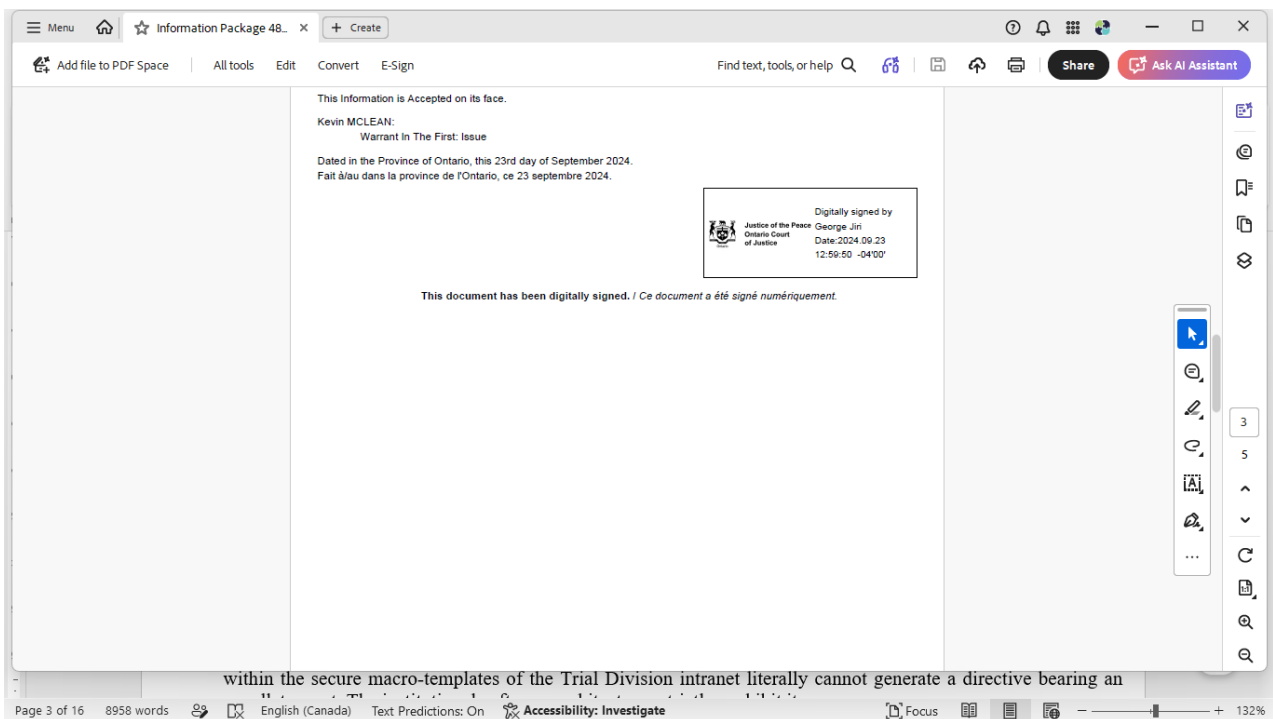
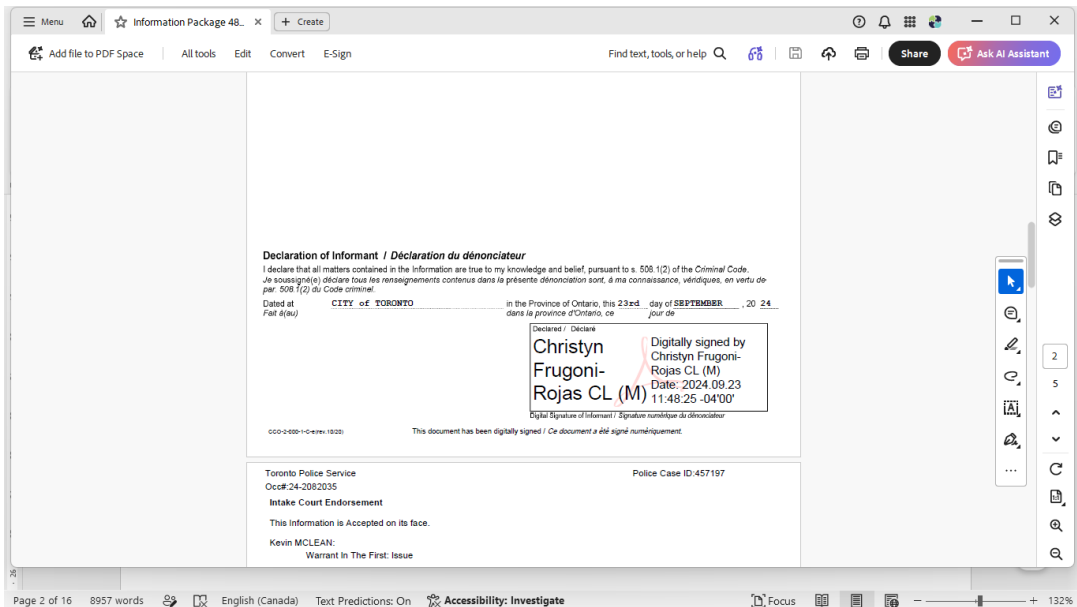
CANADA Information of: Christyn Prugoni-Rojas
 PROVINCE OF ONTARIO Dénonciation de:
 PROVINCE DE L'ONTARIO of: THE CITY OF TORONTO Court Officer:
 TORONTO (Required / Requis) hereinafter called the informant / ci-après appelé(e) le dénonciateur (Required / Requis)
 The informant says that he/she believes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

(1) MCLAREN, Kevin DOB: 26 Mar. 1993
 STR., ON

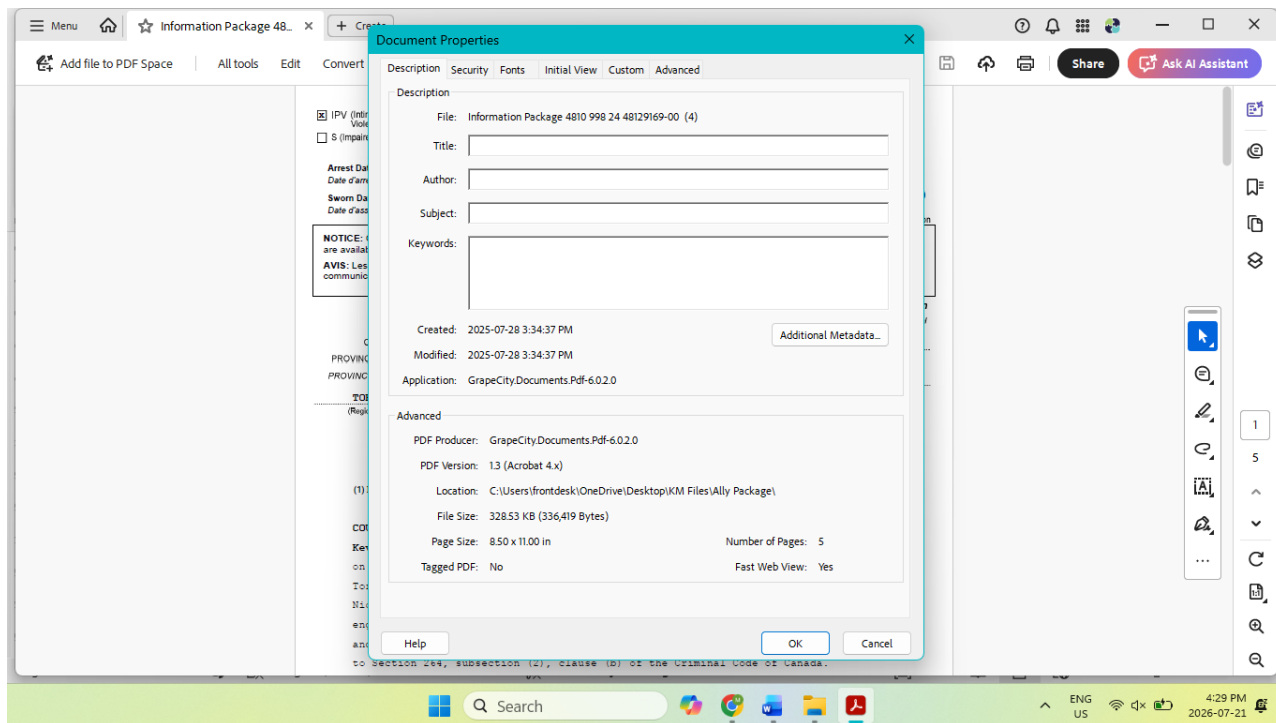
COUNT 1
 Kevin MCLAREN
 on or about the 12nd day of September in the year 2024 as the City of Toronto in the Toronto Region did, without lawful authority and knowing that another person, namely Nicole ARTOPOULOS, was harassed or recklessly as to whether that person was harassed, engage in repeatedly 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

Build 399 introduced a serious architectural conflict between its security modules and the Microsoft Visual C++
 Page 3 of 6 2669 words English (Canada) Text Predictions: On Accessibility: Investigate Focus 82%



[image: metadata from document provided by the OCJ 10 Armoury Street Courthouse:



VOLUME #3(E):HIJACKED BLANK TEMPLATE

39. Having successfully usurped a blank structural template, the orchestrating actor subsequently committed a fatal constitutional and heraldic transgression. The False Document features the synthetic superimposition of the National Coat of Arms of Canada—an insignia strictly and statutorily reserved for the executive branch and appellate tribunals. It comprehensively omits the constitutionally mandated 2008 Federal Court crest, characterized by its distinctive sea-caribou supporters. Invoking the established legal maxim *res ipsa loquitur* (the thing speaks for itself), it is advanced that a legitimate jurist or Registry Officer of the Federal Court, operating natively within the secure macro-templates of the tribunal's intranet, is technologically incapable of generating a directive bearing an appellate crest. The institutional software architecture rigidly and systematically prohibits such a deviation, thereby further cementing the instrument's status as an absolute nullity.
40. Moreover, upon critical forensic review of the authenticated dispositions rendered by Associate Judge Cotter and Associate Judge Crinson, it is axiomatic that embedded metadata remains entirely objective and impervious to external bias. Such technological artifacts are fundamentally devoid of interest in the underlying litigation,

possessing neither administrative nor adjudicative function. Rather, they operate exclusively to furnish incontrovertible, empirical evidence of the digital footprints left by the orchestrator.

41. This evidentiary matrix compels the palpable, manifest, and plain and obvious extrapolation that the unidentified author or authors of the False Document were unequivocally not functioning within the capacity of the Executive Branch, thereby affirming the synthetic, orchestrated, and *ultra vires* nature of the entire subversion.
42. It is averred that the modification would have been the title that Ms. Maya-Jo Blake-Janniere placed on it after it had been created at 1245 a.m. on July 2, 2026. It is presumed that it was either sent surreptitiously or obtained through an account with PDF Xchange.
43. However, the question remains, which will be answered by the granting of the orders herein, who created the Justice Whyte Nowak July 2 Purported Direction (False Document)?

VOLUME #4: A CLOSER LOOK AT MAYA-JO BLAKE-JANNIERE

VOLUME #4(A): BACKGROUND ON MS. MAYA-JO BLAKE-JANNIERE

44. It is a matter of documented record that while Ms. Maya-Jo Blake-Janniere was indicted on severe criminal charges in 2021, she, alongside the operational cohort at the Toronto Local Office, was subsequently recognized for the Client Service Excellence Award. The official corporate citation articulated the following commendation:

“Finally, we are highlighting the recipients of the Client Service Excellence Award, which recognizes extraordinary professionals, individually or as part of a team, who have demonstrated exceptional performance, excellence and professionalism, with a particular focus on an achievement that demonstrates a collaborative, innovative and client service-oriented spirit. The many recipients of this award have distinguished themselves through their strong commitment to client service, whether serving members of the public or members of the Courts. Among the recognized teams was an operational/Registry team from Toronto composed of Robert Mvondo, Brittney Channer, Sherri Ally, Maya Rana, Kyla Chisholm, Diane Lopez, Josephine Chan, Maya-Jo Blake-Janniere, Nasreen Mudhoo, Scinthura Seeraladevan, as well as multiple other outstanding participants.”

VOLUME #4(B): PROJECT GARFIELD: MAY 28, 2021

45. The official Durham radio news press release concerning the investigative initiative designated as Project Garfield documented the following evidentiary findings:

“This month, they searched nine properties, including two in Oshawa and one in Ajax. Other places in Barrie, Toronto and Markham were also searched. Over the course of their investigation, police seized 427 grams of fentanyl, 734 grams of cocaine, 53 grams of crack, Hydromorphone and Oxycodone pills and drug trafficking paraphernalia.

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

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

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

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

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

[image: guns and what appears to be black tar heroin (images of the OPP (copyright)) from Project Garfield)



[Image of what appears to a brick of cocaine (OPP (copyright)) from Project Garfield)]



46. While the initial public dispatch summarized the infractions briefly, the official addendum delineated the specific statutory breaches, enumerating the following formal charges: a. Unauthorized Possession of a Prohibited Firearm contrary to section 91(1) of the *Criminal Code*; b. Possession of a Prohibited Firearm Knowing its Possession is Unauthorized contrary to section 92(1) of the *Criminal Code*; c. Possession of a Loaded Prohibited Firearm contrary to section 95(1) of the *Criminal Code*; b. Possession of a Firearm Knowing that it was Obtained By the Commission of an Offence contrary to section 96(1) of the *Criminal Code*; e. Careless Storage of a Firearm contrary to section 86(2) of the *Criminal Code*; f. Possession of a Schedule I Substance for the Purpose of Trafficking – Cocaine contrary to section 5(2) of the *Controlled Drugs and Substances Act*; and g. Possession of Property Obtained by Crime over \$5000 contrary to section 354(1)(a) of the *Criminal Code*.
47. The two Hawthorne brothers were later charged again in another OPP operation in 2024 (see: <https://torontosun.com/news/local-news/project-cranium-nine-gta-suspects-charged-in-13-million-drug-bust>).
48. An investigation of professional networking repositories, specifically LinkedIn, reveals an active profile attributed to an individual operating under the nomenclature “Ms. Maya Blake,” containing the following graphical identifier and employment particulars:

[image: Maya Blake from LinkedIn, current job (registry officer (hybrid) permanent full time)) [note: bene: hybrid meaning she can work remotely from Oshawa)



Maya Blake Licensed Paralegal Greater Toronto Area, Canada 6 yrs 10 mos
Experience Federal Court of Canada/Toronto, Ontario, Canada General Support Clerk Full-time
Oct 2019 - Present · 6 yrs 10 mos
Registry Officer Permanent Full-time Oct 2019 - Present · 6 yrs 10 mos Hybrid

49. Within the “Experience” section of the aforementioned profile, the institutional heraldry of the Federal Court—specifically the crest utilized consistently since 2007—is prominently and correctly displayed.
50. Ms. Blake’s further documented professional experience is enumerated as follows: a. Founder & Licensed Paralegal at MJ Legal and Financial Services (Self-employed: Jan 2018 - Present, Hybrid) (nota bene: how she was operating that dual role of paralegal and mortgage agent which was and is likely unlawful); b. Mortgage Agent at Citadel Mortgages (Self-employed: Apr 2020 - May 2021, Toronto); c. Paralegal at RosensteinLaw P.C. (Full-time: Aug 2018 - Oct 2019, Toronto); and d. Administrative Assistant at Refund Management Services (Feb 2017 - Aug 2018, Greater Toronto Area).
51. Under the “Education” designation, the following academic credentials and placements are formally listed: a. Bachelor of Laws (LLB), University of London (2019 – 2022); b. Bachelor of Arts (Honours), Legal Studies, Ontario Tech University (2015 – 2017); c. Paralegal Diploma, Seneca Polytechnic (2013 – 2015); d. Paralegal License, Law Society of Upper Canada; e. Practicum Student, Ontario Ministry of the Attorney General - Crown's Office (Jan 2018 - Apr 2018); f. Sales Associate, Nordstrom (Sep 2016 - Feb 2017); g. Summer Student, Regional Municipality of Durham - Legal Services Division (May 2016 - Aug 2016); h. Front End Supervisor, Party City

(May 2015 - Jan 2016); i. Barista, Starbucks (Apr 2015 - Jan 2016); and j. Student Intern, Bottomley Barristers (Apr 2015 - Jun 2015).

52. The digital affiliations and corporate entities endorsed or “liked” by this profile include: a. The Department of Justice (the “**DOJ**”); b. The Federal Court (notably distinguished from the Federal Court of Appeal); c. Pardon Applications of Canada; d. The Attorney General of Ontario; and e. Various ancillary organizations.
53. It is advanced that the demonstrable affinity for the Pardon Applications of Canada program yields a self-evident legal extrapolation. The retention of federal employment amidst severe *Criminal Code* and *Controlled Drugs and Substances Act* indictments strongly supports the inference that she was transitioned into a cooperating witness or informant capacity against her co-accused within the Project Garfield matrix.

VOLUME #4(C):IS MS. MAYA BLAKE ONE AND THE SAME WITH MS. MAYA-JO BLAKE-JANNIERE?

54. The analytical inquiry necessarily proceeds to establish the definitive identity parity between the moniker “Ms. Maya Blake” and “Ms. Maya-Jo Blake-Janniere.”
55. An examination of the Law Society of Ontario (the “**LSO**”) directory yields the following determinative particulars:
56. “Maya-Jo Royanne Blake-Janniere Not Providing Legal Services - Employed Class of Licence: Paralegal - P1 Law Society Number: P12068 Licence Start Date: October 2015
57. Business name: MJ Paralegal Address: 911 Kicking Horse Path, Oshawa, ON L1J 0B4 Phone number: 1 416 884 9857 Email Address: maya@mjlegalandfinancial.com”
58. A geospatial inquiry utilizing Google Maps confirms that the address situated at 911 Kicking Horse Path, Oshawa, Ontario, corresponds to a townhome, the digital imagery of which has been intentionally obscured and blurred upon the platform.
59. The inclusion of the nomenclature “Royanne” is clearly identified as a middle name, an element predictably omitted from the initial law enforcement dispatches originating from the Durham Regional Police Service.

60. It is incontrovertibly demonstrated by the evidentiary record that “Ms. Maya Blake” (having strategically severed the suffixes “Jo” and “Janniere” from her professional public-facing identity) is identical in personage to Ms. Maya-Jo Royanne Blake-Janniere.
61. The subsequent, unavoidable inquiry concerns the administrative rationale underpinning the Courts Administration Service's retention of an individual subject to such severe indictments, notwithstanding the foundational presumption of innocence. The chronological evidence dictates that she was operating as a paralegal and registry officer two years prior to the laying of the criminal charges. These indictments were necessarily subject to mandatory employer disclosure protocols. The perpetuation of her employment under these acute circumstances speaks directly to inferential motives and introduces elements of contextual fraud upon the administration of justice (see: *Brown v. Spagnuolo; Vale; 100 Main Street East*).
62. Compounding these administrative anomalies is the fact that while purportedly functioning “full-time” as a registry officer for the Federal Court, she was concurrently operating as a “self-employed” mortgage agent for Citadel Mortgages. This dual capacity raises profound operational concerns regarding professional commitment, exacerbated by the synchronous laying of charges pertaining to firearms, narcotics, and the possession of property obtained by crime.
63. Chronological analysis establishes that Ms. Blake-Janniere was 25 years of age in 2021, rendering her 30 or 31 years of age in 2026. Following secondary education, she matriculated into the Seneca paralegal program in 2013 at the age of 18, graduating and securing her paralegal licensure in 2015.
64. Given her continuous, full-time tenure at the Federal Court since 2019, culminating in a commendation for client service excellence on June 20, 2026, a critical deduction must be drawn. Applying the doctrine of *res ipsa loquitur*, she possesses the requisite institutional knowledge to identify the correct heraldic emblem of the tribunal. Ergo, she could not plausibly have authored the manipulated July 2 purported direction attributed to Justice Whyte Nowak (the “**False Document**”), as she would inherently recognize the glaring heraldic errors. Rather, it is advanced that her identity and nomenclature were overtly hijacked by the true orchestrator—embedded within the document as “Maya-Jo Blake-Janniere / Rule 369 / Registry Officer”—to furnish a synthetic veneer of administrative legitimacy to the fabricated instrument.

65. The In response to the electronic transmission containing the False Document disseminated from the generic registry inbox on July 2, 2026, the following Registry Officers were identified via automated out-of-office replies:

a. Mr. Andrew Murray; b. Ms. Sandy Wilson (Acting Senior Registry Officer *Rule 369/CMT*); and c. Mr. Shaun Nelson.

66. On July 12, 2026, the automated response generated by Mr. Murray’s terminal dictated:

“I am currently out of the office. I will be returning on August 4th 2026. If your matter is in regards to a *Rule 369* motion please email R369_Toronto2@cas-satj.gc.ca in regards to your inquiry.”

67. On July 12, 2026, the automated response generated by Ms. Wilson’s terminal dictated:

“Hello, Thank you for your email. I am currently out of the office until July 20th. During this time, I will have limited/no access to my email. If your matter is urgent, please contact Stan at stan.shepherd@cas-satj.gc.ca. Otherwise, I will respond to your email as soon as possible upon my return. Thank you for your understanding, Sandy Wilson, Acting Senior Registry Officer, *Rule 369/CMT*”

68. Mr. Nelson’s auto-reply was:

“Dear Sender,
Please note that I will be offline and will not be checking messages. If this is an urgent matter please send your email to R369_toronto@cas-satj.gc.ca to ensure your email gets actioned in a prompt manner.
Thank you”

Volume #4(D)(IV): The Elimination of Mr. Murray, Mr. Nelson an Ms. Wilson

69. Through the application of the legal presumption *omnia praesumuntur rite et solemniter esse acta* (all acts are presumed to have been done rightly and regularly), these specific registry officers—one holding a senior acting designation—can be systematically eliminated from suspicion of authoring the impugned document. It is presumed that their institutional tenure and operational competence would completely preclude them from engaging in such rudimentary heraldic and structural fraud.

VOLUME 5: THE COUNSEL IMPLICATED

70. Mr. Tyler Alviano obtained his undergraduate and master's degrees from Wilfrid Laurier University between 2014 and 2019. Subsequently, his Juris Doctor was conferred by the University of Ottawa between 2019 and 2022, an academic tenure that ran concurrently with that of Mr. Jacob Norris.
71. He was called to the Bar of Ontario in June 2023. Prior to his current designation as an associate lawyer at Neuberger & Partners LLP, his articles of clerkship were fulfilled at a boutique corporate law firm situated in Ottawa, Ontario, wherein he assisted counsel with a spectrum of matters pertaining to start-up and high-growth corporate entities.
72. During his academic progression, he functioned as a teaching assistant for first-year constitutional law and conducted independent research concerning the jurisprudence of wrongful convictions within the Canadian judicial system.
73. Mr. Alviano is formally documented as counsel of record in the matter of *Zekry v. Canada (Revenue Agency)*, bearing Court File No. T-4313-25, which was instituted in October 2025.
74. A meticulous review of the adjudicative repository reveals a singular recorded interlocutory disposition within the aforementioned proceeding, catalogued verbatim as:
75. “Document #: 13 ____ Directions of the Court - Oral directions (Interlocutory) dated 2026-06-16 rendered by Associate Judge L.E. Trent Horne without personal appearance regarding doc # 9 - Letter - Informal Motion Result - granted 2026-06-16 issued to: all parties by email placed on file on 2026-06-16.” This disposition was promulgated in response to an informal motion advanced on March 17, 2026, strictly pursuant to Rule 8 of the *Federal Courts Rules*, seeking an extension of time to serve and file the applicant's record.
76. Applying the legal doctrine of *cui bono* (who benefits) alongside chronological deduction, it is established that a temporal window existed following Mr. Alviano’s receipt of the June 16, 2026, Tax Court of Canada disposition. This window provided the requisite opportunity for the unblemished digital template to be transferred and provisioned to the orchestrators for subsequent falsification and manipulation.

77. Within the parameters of the present judicial review proceeding involving the Royal Canadian Mounted Police, the Applicant, alongside Mr. Norris and Mr. Continelli, received the authentic procedural disposition rendered by Associate Judge Crinson on June 24, 2026. Shortly thereafter, the fabricated instrument—specifically the July 2 purported direction attributed to Justice Whyte Nowak (the “**False Document**”)—was ostensibly issued and disseminated on July 2, 2026.
78. The jurisprudential record further corroborates Mr. Alviano’s litigation history in both the Tax Court of Canada and the Ontario Superior Court of Justice, noting his appearances as counsel in the following adjudicated matters:
- a. *Brown v. The King*, 2025 TCC 184 (with Mr. John Chapman), rendered by the Honourable Justice Perry Derksen;
 - b. *Ram v. The King*, 2025 TCC 49 (with Mr. Craig Maw); and
 - c. *R. v. Georgopoulos*, 2024 ONSC 2962 (with Mr. Michael Bury of Neuberger & Partners LLP), concerning a conviction for dangerous driving causing bodily harm.
79. Chronological analysis establishes that Mr. Alviano commenced employment with the Department of Justice in October 2024. This temporal nexus inextricably aligns with the precise month during which the Applicant was purportedly subjected to a false arrest and unlawful confinement perpetrated by the 14th Division of the Toronto Police Service.
80. The inferential conclusion derived from this evidentiary convergence posits an unambiguous connection: the structural, logo-less template utilized to engineer the False Document was sourced directly from a docket wherein he served as counsel of record.
81. The full extent of his complicity and the broader matrix of his involvement remain subjects necessitating further, rigorous adjudicative inquiry.

VOLUME #5(B):MR. JACOB NORRIS

82. Mr. Jacob Norris was admitted to the Law Society of Ontario during the summer of 2024, subsequently commencing his tenure at the Department of Justice in September 2024. His academic pedigree includes an undergraduate degree from the University of King’s College (2012–2016), a Master of Arts from Western

University (2016–2018), and a combined Juris Doctor and Master of Arts program (2019–2023). His articles of clerkship were fulfilled with the Ministry of the Attorney General of Ontario spanning 2023 to 2024.

83. The jurisprudential corpus identifies Mr. Norris as counsel in the following notable proceedings: a. *Universal Protection Service of Canada Corporation v. Canada (Attorney General)*, 2026 CanLII 35099 (FC) (concerning a motion for leave to amend); b. *Wu v. Canada (Judicial Council)*, 2025 FC 866 (concerning a complaint against the decision of a screening officer); c. *1001270243 Ontario Inc.*, 2026 ONSC 3967 (adjudicated upon the Commercial List, wherein he appeared alongside Mr. Walter Kravchuk, an individual identified within the evidentiary appendix as harbouring a protracted animus directed at the Applicant originating from their shared academic tenure between 2005 and 2008); d. *Lufthansa Technik Aktiengesellschaft v. Canada (Attorney General)*, 2025 FC 1891 (resulting in a successful application for judicial review); and e. *Chesnais v. Canada (Attorney General)*, 2025 FC 1564 (concerning an immigration matter).

VOLUME #5(C): NICK CONTINELLI

84. Mr. Nick Continelli represents the most seasoned practitioner among the implicated counsel, possessing an extensive compendium of reported jurisprudence predominantly localized within immigration law, supplemented by appearances in criminal and parole review board adjudications.
85. His publicly disseminated professional profile evinces a foundational clerkship with the Federal Court, articling experience with the Ottawa Police Service, and a summer tenure with Ecojustice. It notes he is “Skilled in Legal Writing, Legal Research, Teaching, and Public Speaking.” His academic qualifications encompass a Juris Doctor from the University of Ottawa, a Bachelor of Education from Brock University, alongside a Master of Arts and Bachelor of Arts conferred by McMaster University. Originating from Hamilton, Ontario, he operates from the regional headquarters situated at 120 Adelaide Street West, Suite 400, Toronto, Ontario, M5H 1T1.

VOLUME #5(D):WALTER KRAVCHUK (SEE: APPENDIX #1 FOR FURTHER DETAILS OF A SORDID HISTORY, BACKGROUND AND CONNECTION TO THE DESPERATE (FINANCIALLY) SISTER OF THE APPLICANT’S EX-FIANCÉE OF WHICH THE APPLICANT STOOD IN THE WAY OF HER CRAWLING SOMEWHAT OUT OF SEVEN FIGURES OF SECURITIZED DEBT

86. Mr. Walter Kravchuk maintains a professional portfolio comprising approximately twenty reported adjudications, predominantly sequestered within the domains of creditor rights, bankruptcy, insolvency, and corporate winding-up proceedings. The specific nature of this practice area naturally infers a professional adjacency or nexus to the former Chief Justice Morawetz. Operating within a firm possessing a Ukrainian office, it is noted that Mr. Kravchuk proudly identifies with his Ukrainian heritage. Furthermore, the evidence adduced establishes a protracted, historically documented animus harboured by Mr. Kravchuk against the Applicant, originating from their shared matriculation as law students. This adversarial posture is compounded by Mr. Kravchuk's closely cultivated relationship with Ms. Ashley Artopoulos, who is identified as the sister of the Applicant's former fiancée. The evidentiary record delineates that during the critical temporal window of September and October 2024, Ms. Artopoulos was burdened by substantial insolvency exceeding one million dollars, thereby necessitating an immediate financial remediation purportedly derived from the liquidation of a condominium property formerly belonging to her mother, situated at Unit 410, 775 King Street West, Toronto, Ontario, M5V 2K3.

VOLUME 6: THE CITADEL MORTGAGES' MORTGAGE AGENT IN MS. MS. MAYA-JO BLAKE-JANNIERE

VOLUME #6(A): WHAT DOES A SELF-EMPLOYED MORTGAGE AGENT FOR CITADEL MORTGAGES DO OR DID?

87. As delineated *supra*, during the temporal window spanning 2020 to 2021—antecedent to the levying of seven severe criminal indictments against Ms. Maya-Jo Blake-Janniere, encompassing the possession of loaded prohibited firearms, the trafficking of cocaine, and the possession of property obtained by crime—it is documented that she was concurrently enrolled in a legal baccalaureate program situated in London, England, ostensibly via remote instruction. Synchronous to this academic pursuit, she was actively fulfilling a purported full-time mandate within the Courts Administration Service of the Federal Court, while concurrently operating as a self-employed mortgage agent affiliated with Citadel Mortgages.

88. Operating in the capacity of a self-employed mortgage agent for Citadel Mortgages, the individual inherently functions as an independent commercial entity, albeit statutorily tethered to the regulatory and branding framework

of the overarching brokerage. The fundamental operational mandate necessitates functioning as an intermediary facilitator between prospective mortgagors and lending institutions to secure real estate financing across the Canadian dominion.

89. It must be unequivocally stated that the licensure of a paralegal does not automatically confer the status or privileges of a mortgage agent. In the Province of Ontario, paralegals and mortgage agents are governed by mutually exclusive statutory regimes, regulatory bodies, and educational frameworks. The possession of a paralegal license grants no automatic exemptions or rights to engage in the practice of a mortgage professional. The foundational jurisdictional and operational demarcations are systematically outlined as follows: a. Regulatory Disconnect: Paralegals are strictly regulated by the Law Society of Ontario (the “**LSO**”) pursuant to the *Law Society Act*, R.S.O. 1990, c. L.8. Conversely, mortgage agents fall under the exclusive purview of the Financial Services Regulatory Authority of Ontario (the “**FSRA**”) pursuant to the *Mortgage Brokerages, Lenders and Administrators Act, 2006*, S.O. 2006, c. 29; b. Absence of Dual-Exemption: While provincial legislation furnishes a narrow mortgage brokering exemption for licensed barristers and solicitors acting strictly within their professional capacity for an existing client, this statutory exemption is entirely inapplicable to paralegals; and c. Mandatory Brokerage Sponsorship: Whereas paralegals frequently operate as independent practitioners or within legal partnerships, a mortgage agent is legally precluded from operating in a standalone capacity; they must be explicitly employed, sponsored, and supervised by a licensed mortgage brokerage.

Feature	Paralegal	Mortgage Agent
90. Primary Duty	91. The provision of legal services and representation before tribunals and courts of competent jurisdiction.	92. The solicitation, negotiation, and arrangement of mortgage financing between mortgagors and mortgagees.
93. Education	94. The completion of an accredited legal curriculum coupled with the successful	95. The completion of a provincially sanctioned regulatory curriculum and subsequent formal examination.

fulfillment of provincial licensing examinations.

96. Insurance

97. The mandatory maintenance of professional liability indemnification through the LSO.

98. The maintenance of errors and omissions insurance via the sponsoring corporate brokerage.

99. Compensation

100. Remuneration effectuated via legal fees, block fees, or hourly rates rendered directly by the client.

101. The procurement of commissions or finder's fees dispersed exclusively through the employing brokerage.

102. A logical extrapolation of this concurrent academic and professional trajectory suggests a calculated intent to acquire a legal degree for the purpose of operating as a non-practising legal professional. Such a designation would theoretically facilitate the operation of a lucrative mortgage agency enterprise, generating substantial commissions through the procurement of non-conforming or subprime mortgage instruments. Furthermore, a practitioner may hold dual licensure, provided they complete the mandated FSRA curriculum, align with a licensed brokerage, and formally disclose the dual-capacity to both the LSO and FSRA to mitigate inherent conflicts of interest.

103. Furthermore, it is a trite legal principle that members of the bar are not *ipso facto* designated as mortgage agents. However, pursuant to the strict statutory confines enumerated in subsection 6(6) of the *Mortgage Brokerages, Lenders and Administrators Act, 2006*, barristers and solicitors are exempted from the mandatory licensing requirements administered by the FSRA, provided the activities fall squarely within a narrow, prescribed professional capacity. Pursuant to Ontario Regulation 407/07, the mortgage activity must be executed strictly as an integrated component of providing legal services to an existing client (e.g., the finalization of a real estate conveyance). The legal practitioner is strictly forbidden from marketing or holding themselves out to the public as a mortgage broker or lender.

Feature	Licensed Lawyer (Operating Under Statutory Exemption)	Licensed Mortgage Agent
104. Primary Regulator	105. The LSO	106. The FSRA
107. Core Function	108. The facilitation of real estate conveyancing, title review, and the registration of charges upon the public registry.	109. The procurement, negotiation, and securement of optimal financing terms on behalf of a prospective purchaser.
110. Advertising Status	111. Statutorily prohibited from the marketing or solicitation of mortgage-procurement services.	112. Actively engaged in the marketing and solicitation of financing solutions to the general populace.
113. Operational Setup	114. Operates independently or within the structured hierarchy of a legal partnership or corporation.	115. Statutorily mandated to be exclusively sponsored by, and subordinate to, a singular licensed mortgage brokerage.

VOLUME #6(B): CORE RESPONSIBILITIES

116. The core operational responsibilities inherently associated with this agency role mandate the rigorous execution of the following duties: a. Lead Generation: The unilateral responsibility for the cultivation of a client base through targeted marketing, networking, and the establishment of strategic alliances with real estate professionals; b. Financial Assessment: The critical analysis of credit histories, debt-to-income ratios, and financial documentation to ascertain the precise borrowing capacity of prospective clients; c. Product Sourcing: The strategic matching of borrowers with standard institutional financial products, secondary lending solutions, or alternative private capital reserves; and d. Complex File Navigation: The routine structuring of specialized financial dossiers,

encompassing bespoke options for self-employed individuals, distressed credit profiles, and cross-border real estate investors.

Volume #6(B)(I): The Seminal Responsibility with Nexus: submit files directly to underwriters/financial institutions (mortgagees)

117. The management of underwriting protocols and systemic interfaces necessitated the utilization of proprietary client relationship management architecture and lender profile software. This technological framework empowered the agent to submit financial dossiers and evidentiary records directly to underwriters and institutional mortgagees.

118. Furthermore, the agent was tasked with the coordination of closing procedures, functioning as the primary conduit between the mortgagor, the mortgagee, and the retaining real estate solicitors to ensure the strict satisfaction of all preconditions prior to the statutorily mandated funding dates.

Volume #6(B)(II): Key Features of the Role

119. The professional matrix of this position was further characterized by the following operational features: a. Compensation Structure: Remuneration was derived exclusively on a commission basis, calculated as a specific percentage of the total loan volume procured; b. Operational Flexibility: The agent maintained full autonomy over remote scheduling and daily operational deployment; c. Institutional Support: The provision of bi-weekly strategic coaching sessions facilitated directly by the Principal Broker; and d. Product Access: The authorization to utilize exclusive financial vehicles, including high loan-to-value private lending programs.

Volume #6(C): Self-Employed (like paralegal)

120. The execution of these multifaceted duties incontrovertibly required sophisticated software solutions for the drafting, execution, and secure transmission of financial instruments and supporting evidentiary documentation. An objective extrapolation of the factual matrix—specifically the documented association with organized criminal enterprises processing substantial quantities of illicit currency—yields the unassailable inference that alternative,

subprime lending channels would have been heavily relied upon. Such avenues are *prima facie* engineered to service clients manifesting compromised credit histories yet possessing significant, albeit opaque, capital reserves.

121. Recognizing that Tracker Software Products completely ceased the public commercialization of the PDF-XChange Software Development Kit in 2021, restricting procurement strictly to vetted entities, it is advanced that an active mortgage agent operating an independent financial enterprise would possess the requisite corporate veneer and technological necessity to successfully bypass these public acquisition blockades prior to, or synchronous with, the discontinuation.

122. The crystallisation of the aforementioned criminal indictments in 2021 *ipso facto* precipitated the cessation of her tenure as a mortgage agent affiliated with Citadel Mortgages. This profound professional disruption predictably culminated in the revocation or forfeiture of her provincial regulatory licensure, notwithstanding the eventual, subsequent conferral of her legal baccalaureate.

VOLUME 7: EMBEDDED IMAGE OBJECTS

123. A rigorous and exhaustive interrogation of the embedded image objects securely housed within the digital ledger of the impugned instrument further exposes the overtly fraudulent and mathematically manufactured nature of the superimposed insignia. The internal “Pdf Images” array structurally identifies a singular, isolated image object, cryptographically denoted as “Object Id 25”. This specific graphical entity possesses the highly degraded, rasterized dimensions of one hundred and fifty pixels by two hundred and one pixels, occupying a diminutive and heavily artifacted 11.3 kilobytes of digital storage. The deployment of such a highly compressed, low-resolution digital artifact conclusively demonstrates that an external orchestrator manually affixed a thumbnail graphic that was illicitly scraped from a public internet repository or lower-tier search engine cache. This rudimentary methodology completely eschews the high-resolution, mathematically pristine, vector-based heraldry that is universally and natively embedded within all authentic adjudicative templates utilized by the Courts Administration Service. It is advanced that the secure intranet of the tribunal is technologically incapable of outputting such a lossy, pixelated degradation of the national emblem.

124. The chronological matrix encompassing the document's synthesis operates to establish a further, insurmountable temporal impossibility. The “Creator” and “CreatorTool” metadata properties are irrevocably and permanently stamped by the external commercial manipulation software designated as “PDF-XChange Editor”, specifically identified within the extensible metadata platform stream as build 10.7.1.399. As of the purported generation date in July 2026, the commercial publisher of the aforementioned software had formally advanced the public commercial release to Version 11, rendering the utilized iteration comprehensively obsolete. The clandestine deployment of an antiquated, recalled, and inherently unstable standalone consumer build from August 2025 fundamentally defies the strict information technology management policies, the zero-trust cybersecurity architectures, and the rigorously patched enterprise-licensed software deployments mandated by the federal courts. This absolute technological divergence confirms *ipso facto* that the instrument was synthesized upon an external, unauthorized, and unmonitored terminal, wholly severed from the secure infrastructure of the registry.
125. Volume #7(A): The Premeditated Procurement of Superannuated Software Versions
126. The deliberate procurement of the superannuated build 10.7.1.399 of PDF-XChange Editor necessitates a premeditated navigation of the developer's archived, legacy builds repository. The commercial developer, Tracker Software Products, strictly mandates that a user authenticate a registered, verified account to successfully access and download these deprecated historical iterations. Alternatively, direct installer executable files remain accessible solely via third-party, unverified software archives, such as the Uptodown repository. Ergo, it is advanced through logical deduction and the application of foundational forensic principles that the registered account holder possessing the legacy license for this specific, obsolete software iteration—or an individual adept at navigating grey-market software archives—remains the highly probable orchestrator of this digital manipulation. The specific selection of this outdated software version evinces a calculated methodology, purportedly chosen for its known vulnerabilities or the orchestrator's entrenched familiarity with its deprecated user interface.
127. Volume #7(B): Font Embedding Deficiencies and Structural Nullities
128. The forensic data extraction reveals an absolute and systemic absence of font embedding, a condition constituting a profound structural and cryptographic security violation that is entirely foreign to official court directives. For font indices zero through seven, specifically encompassing standard operating system typographies

such as “Gabriola”, “SegoeUI-Semilight”, and “TimesNewRoman”, the cryptographic ledger explicitly dictates “Embedded false” and “Subset false”. Authentic adjudicative instruments, specifically those engineered to satisfy the rigorous parameters of PDF/A archiving standards utilized by the tribunal for perpetual public record retention, universally demand fully embedded typography to guarantee immutable, uniform rendering across all potential viewing platforms. The unauthorized reliance upon un-embedded, local consumer fonts definitively severs this document from any legitimate registry genesis, characterizing the instrument not merely as procedurally flawed, but as an absolute nullity *ab initio*.

129. The structural anomalies inherent in the application's basic “Save As PDF” protocol further betray the manual, non-native compilation of the forgery. Authentic directives issued by the tribunal inherit the core digital DNA of the original secure network rollout, frequently bearing baseline macro timestamps originating from the initial architectural implementation in 2006, which subsequently govern the automated generation of standardized forms. Conversely, the impugned document was synthesized entirely outside this secure ecosystem, registering a creation timestamp of 12:44:56 p.m. and a final modification timestamp of 1:01:15 p.m. on the identical diurnal period. This hyper-compressed, sixteen-minute temporal window fundamentally belies native template generation or legitimate judicial contemplation; rather, it exists purely as the indelible operational signature of manual digital assembly, hasty visual placement review, and rapid exportation executed by an external actor scrambling to disseminate the fabrication.

130. Beyond the temporal impossibilities, the deployment of PDF-XChange Editor build 10.7.1.399 introduces profound architectural incompatibilities, specifically an irreconcilable conflict between its native security modules and the Microsoft Visual C++ runtime environment. It is a documented and objectively verifiable technological reality that the Azure Rights Management Services (the “**AzureRMS**”) plugin inherently triggered catastrophic, unrecoverable system failures when interfacing with standard runtime binaries within this specific iteration. The precipitous deployment of this inherently unstable build within a monitored government network would have immediately flagged an enterprise-wide endpoint management alert.

131. Consequently, it is mathematically and technologically impossible for the impugned document—specifically the justice Whyte Nowak July 2 purported direction (the “**False Document**”)—to have successfully

navigated, been processed by, and received a verified government security clearance layer through standard institutional architecture without precipitating an immediate and fatal software crash.

132. Furthermore, this specific developmental branch of the software harboured severe systemic defects regarding the generation of printer spooling data. When channeled through virtual or physical print drivers mandated by government telecommunications protocols, the application outputted irrevocably corrupted spool and shadow files, systematically omitting essential graphical layers or generating entirely blank anomalies. Should it be postulated by the respondents that the False Document was seamlessly derived, routed, or scanned via official registry infrastructure, the documented presence of this fundamentally corrupted spooling architecture renders such a narrative technically vacuous and epistemologically unsound.

133. The structural irregularities are further exacerbated by the software's fundamentally compromised drag-and-drop page manipulation protocol. Build 10.7.1.399 possessed a documented architectural anomaly wherein manually dragged pages were forcefully subjected to global insertion sequences. This defect illicitly stripped or involuntarily injected crucial metadata layers, interactive form fields, and named digital destinations entirely dependent upon antecedent, unrelated user actions. The presence of this digital volatility confirms that any manual manipulation of the page layout order would invariably inject accidental structural corruptions, irrevocably destroying the pristine, linear coding structure strictly mandated for official curial directives.

134. Finally, the digital signing hierarchy of build 10.7.1.399 was profoundly flawed, inherently failing to securely interface with the Windows Certificate Store. Legitimate, globally trusted cryptographic certificates utilized by the federal government were systematically suppressed by the software, triggering generic security permission errors during attempted signature placement. Consequently, any assertion that this instrument was natively and securely executed via the rigorous digital signature protocols of the tribunal's registry while utilizing this specific, compromised software build is technically implausible and warrants the utmost judicial skepticism.

135. Volume #7(C): The Typographical Anomalies and the Subversion of the Federal Identity Program

136. The artificiality of the document is further explicitly betrayed by the grotesque typographical manipulation of the national identifier. A rigorous visual and spatial analysis reveals that no authentic federal court within the Canadian dominion spaces out the lettering of the word “Canada” as “C A N A D A” upon its official documents,

correspondence, or structural headers. Neither the Tax Court of Canada, the Federal Court of Appeal, nor the Federal Court itself utilizes this wide, fragmented tracking between individual characters. Authentic Canadian federal courts adhere strictly and unequivocally to the Federal Identity Program (the “FIP”) corporate identity standards, which prescribe exact, continuous, and highly regulated word spacing to ensure institutional uniformity.

137. Furthermore, in official government layouts governed by the FIP, the Canadian Coat of Arms or specialized tribunal crests are integrated cleanly and mathematically alongside standard typography. They are never awkwardly superimposed directly over loosely spaced, malformed lettering, as is conspicuously evidenced within the False Document. The presence of this “C A N A D A” kerning anomaly serves as an immediate, *prima facie* indicator of a counterfeit or simulated document, entirely divorced from any genuine layout utilized by the Courts Administration Service. The veracity of this typographical subversion is explicitly corroborated by the evidentiary exhibit *ARETHE~1.PDF*, which documents the absolute absence of such formatting within legitimate adjudicative frameworks.

138. This specific letter-spacing anomaly is a documented artifact directly attributable to the technical conflicts inherent in manipulating documents via PDF-XChange Editor version 10.7.1.399. The “C A N A D A” kerning defect is mathematically generated through three distinct operational failures of the software engine: a. “Justify All” Text Realignment and Bounding Box Inheritance: When an external actor utilizes the “Edit PDF” tool to overwrite an existing text layer, the software automatically generates a bounding box. Should a user delete a larger string of text (such as a full institutional title) and replace it with a truncated word like “Canada”, the version 10.7 engine frequently inherits the antecedent alignment block. If this block was previously set to “Justify”, the software forcefully and artificially stretches the inputted text, separating the characters to span the entire width of the newly inherited frame; b. The Failure to Sync Unembedded Fonts: As established *supra*, the orchestrator failed to properly embed the requisite typography. When font substitution occurs because the manipulator lacks the exact vector font utilized by the authentic registry, the software is forced to approximate the new system font into the original glyph width table (the spatial coordinates reserved for the original characters). Because the kerning metrics fundamentally clash, the software miscalculates the spatial relationships, causing the letters to aggressively separate; and c. Misuse of the “Typewriter” Tool: The generation of this anomaly is a hallmark of amateur manipulation utilizing the

“Typewriter” tool overlay. This tool frequently defaults to fixed-width, monospaced fonts (such as Courier New). If the orchestrator manually inserted spaces or engaged the tabulator key to force the text to stretch across a white redaction block, the application separates each letter as an independent, explicitly positioned graphic character, permanently locking the text into a spaced-out, broken layout.

139. Volume #7(D): The Consequential Nullity of the Adjudicative Instrument

140. By invoking the fundamental equitable doctrine and legal maxim *ubi jus ibi remedium* (where there is a right, there is a remedy), it is forcefully asserted that the systematic deprivation of procedural fairness evidenced herein was engineered through a calculated, deliberate act of technological forgery. The resultant deprivation of rights cannot be classified as a mere administrative oversight; rather, it constitutes an absolute jurisdictional nullity. When the coercive or directive powers of the state are ostensibly mobilized predicated upon such mathematically unmasked, manufactured instruments, the resultant actions are definitively *ultra vires* and subject to immediate expungement *in limine*.

141. It remains a foundational, unshakeable pillar of Canadian jurisprudence, articulated through the enduring maxim *fraus omnia corrumpit*, that fraud vitiates everything. The deliberate, synthetic amalgamation of an antiquated, heavily glitched PDF manipulator, a hijacked Tax Court of Canada structural template, a scraped low-resolution raster graphic, and a fraudulently superimposed, improperly kerned National Coat of Arms irrevocably poisons the purported directive *ab initio* and renders the purported adjudication *coram non judice*.

142. The ultimate, incontrovertible exposure of this fabricated instrument was effectuated by the external orchestrator's abject failure to adequately sanitize the internal properties of the original Microsoft Word document prior to cryptographic PDF conversion. Whereas the superficial, visible textual elements and the external operating system file nomenclature were amateurishly manipulated to ostensibly reflect the current docket (Court File No. T-2448-26), the concealed extensible metadata platform stream immutably preserved the permanent, indelible digital fingerprint of its authentic ancestral source (Court File No. T-4313-25). This preserved chronological anchor stands as the definitive proof of a systemic, orchestrated subversion of the administration of justice.

VOLUME 8: THE DEFAULT OF THE RESPONDENTS AND THE VITIATION OF SERVICE REQUIREMENTS

143. It is advanced that, whereas an entitlement to formalized service was irrevocably forfeited by the respondents (the “Respondents”) pursuant to the strictures of rule one hundred and forty-five (the “Rule 145”) of the *Federal Courts Rules*, SOR/98-106, comprehensive institutional notice of the proceeding was successfully and lawfully effectuated. The strict legal impossibility of demanding formal service following an uncured default is a foundational axiom of civil procedure, as definitively recognized and codified by the unappealed binding order of Associate Judge Crinson on June 24, 2026.
144. Specifically, the honourable attorney general of Canada (the “Honourable Attorney General of Canada”), alongside specifically implicated agents, was successfully notified via facsimile transmission and electronic correspondence, as meticulously documented within appendix number one (the “Appendix Number One”). The jurisprudential dichotomy between statutory service—which establishes jurisdiction and is permanently forfeited upon default—and the ethical provision of institutional notice for the purposes of transparency, record-preservation, and whistleblowing is absolute and must be formally recognized by this Honourable Court.
145. Subsequent to the successful transmission of the aforementioned notice, a complete cessation of adversarial engagement has been exhibited by the Respondents. The Respondents have not registered any formal opposition to the Third Notice of Motion, nor have they tendered any responsive instruments within the prescribed temporal limitations. This profound silence is legally interpreted as an acquiescence to the procedural impossibility in which they are entangled, thereby cementing their continuing and uncured default *ipso facto*.

B. The Epoch-Making Discoveries Pertaining to the Certified Tribunal Record

146. Seminal, influential, pivotal, and epoch-making discoveries have been crystallized as of the present date, illuminating the intricate relational dynamics involving the Honourable Attorney General of Canada and its proxy agents. These discoveries fundamentally alter the adjudicative complexion of the present quasi-criminal and administrative proceedings.

147. The evidentiary compendium contained within Appendix Number One elucidates the profound rationale underlying the conspicuous absence of any formal objection to the transmission of the certified tribunal record (the “Certified Tribunal Record”) into the adjudicative repository herein. The demonstrable reluctance of the executive branch to formally oppose the ingestion of the Certified Tribunal Record serves as an irrefutable acknowledgment of the insurmountable cryptographic and forensic anomalies embedded within the contested instruments. It is submitted that the Respondents are functionally paralyzed, trapped between the absolute necessity of complying with a formalized statutory production mandate and the catastrophic institutional prejudice that will invariably arise upon the unredacted disclosure of the underlying operational metadata.

C. The Drawing of Adverse Inferences

148. It is a well-entrenched jurisprudential maxim that the absolute failure of a party to tender rebuttal evidence, file responsive submissions, or produce a single document within the Certified Tribunal Record—despite possessing unimpeachable institutional notice of the Third Notice of Motion—compels the trier of fact to draw the strongest possible adverse inferences against said defaulting party.

149. Where the Applicant has adduced clear, cogent, and mathematically verifiable cryptographic evidence of institutional fraud and statutory subversion, the evidentiary burden shifts practically, if not legally, to the Respondents to explain these catastrophic anomalies. Their profound silence and absolute refusal to inject a single documentary instrument into the adjudicative repository operates as an unequivocal, tacit admission of the averments detailed herein. The Court is mandated to formally infer that any evidence or submissions tendered by the Respondents would have been fundamentally adverse to their own interests and would have further corroborated the overarching malfeasance.

VOLUME 9: IMPROPER MOTIVES, INSTITUTIONAL MALFEASANCE, AND THE DOCTRINE OF FRAUS OMNIA CORRUMPIT

A. THE INTERCONNECTED WEB OF SYSTEMIC SUBTERFUGE

150. The improper motives actuating the RCMP and their administrative affiliates have crystallized with absolute and brutal clarity. The documentary *acta* reveal a highly coordinated, interconnected web of disparate actors, spanning years and occasionally decades. The transition from a dismissed municipal police call anchored in a localized civil disagreement to a weaponized federal enforcement action required a profound circumvention of established criminal procedure, orchestrated through an intricate architecture of complicity.
151. This overarching malfeasance, characterized by severe jurisdictional shopping and the weaponization of federal law enforcement apparatuses, accentuates precisely why the mandatory production of the metadata requested pursuant to rule three hundred and seventeen (the “Rule 317”) of the *Federal Courts Rules* remains fundamentally indispensable. The extraction of the raw hexadecimal ledgers, the Originating Agency Identifiers, and the foundational offline database queries is the *sine qua non* for untangling this institutional fraud.
152. It is a foundational pillar of Canadian jurisprudence, articulated through Herbert Broom’s enduring maxim *fraus omnia corrumpit* (fraud vitiates everything), that any procedural maneuvers, administrative decisions, or judicial directives predicated upon a mathematically and forensically verifiable fraud upon the tribunal are rendered irrevocably void *ab initio* and *coram non iudice*. The clandestine utilization of third-party, commercial post-production manipulation software to synthesize a judicial directive, complete with a cloned internal file identifier linked to antecedent tax litigation, fundamentally triggers the immediate application of this nullifying doctrine.

VOLUME 10: JURISDICTIONAL AND STATUTORY COMPETENCE OF THE NAMED TRIBUNAL

A. THE PROPER NAMING OF THE ROYAL CANADIAN MOUNTED POLICE

153. It is a matter of strict statutory interpretation that the definitional parameters of a tribunal encompass the Royal Canadian Mounted Police. Pursuant to the *Federal Courts Act*, RSC 1985, c F-7, a federal board, commission, or other tribunal possesses a broad definitional scope, explicitly encompassing any body, person, or persons having, exercising, or purporting to exercise jurisdiction or powers conferred by or under an Act of Parliament.
154. The propriety of designating the Royal Canadian Mounted Police as the responding tribunal in an application for judicial review is explicitly reinforced and recognized by the binding jurisprudence articulated in

Wasylynuk v. Canada (Royal Mounted Police), 2020 FC 962 (the “*Wasylynuk Decision*”). Consequently, judicial review relief can, and must, be directed against specific named individuals operating within this framework when such circumstances are warranted.

155. Furthermore, the foundational architecture of the *Crown Liability and Proceedings Act*, RSC 1985, c C-50, explicitly authorizes such nomenclature. Subsection 23(1) of said legislation dictates that proceedings against the Crown may be maintained in the name of the Honourable Attorney General of Canada or, conversely, in the case of an agency of the Crown against which proceedings are by an Act of Parliament authorized to be taken, in the name of that specific agency.

B. THE DISTINCTIVENESS OF THE RELEVANT FEDERAL INSTITUTIONS

156. It is imperative to formally delineate that the department of justice (the “Department of Justice”) operates as a completely distinct, independent federal government institution under the *Privacy Act*, RSC 1985, c P-21, structurally severed from the Royal Canadian Mounted Police. Each distinct entity is statutorily mandated to maintain bespoke privacy controls and to manage access to its respective repositories with absolute independence. The cross-departmental intermingling of digital administrative templates constitutes a profound breach of this mandated severance.

VOLUME 11: THE STATUTORY DUTIES OF THE HEAD OF THE GOVERNMENT INSTITUTION AND THE DOCTRINE OF NON-DELEGATION

A. THE UNASSAILABLE OBLIGATIONS OF THE COMMISSIONER

157. Under the stringent parameters of the *Privacy Act*, the head of the government institution (the “Head of the Government Institution”)—presently Commissioner Duheme—is vested with explicit, non-derogable statutory duties. The nomenclature identifying the Head of the Government Institution is deliberately utilized eighty-three distinct times within the legislation, establishing an unequivocal legislative intent to impose direct, non-transferable accountability.

158. This encompasses the strict mandates that the Head of the Government Institution must personally consider public interest disclosures under paragraph 8(2)(m), personally retain records under subsection 8(4), personally notify the Privacy Commissioner under subsection 8(5), personally retain disclosure records under section 9, personally ensure personal information bank entries under section 10, personally respond within the temporal strictures of section 14, personally authorize extensions under section 15, and personally issue formal refusals under section 16.
159. Pursuant to section 73 of the *Privacy Act*, the power of delegation is rigidly constrained. While the Head of the Government Institution may, by formal order, delegate powers to an officer of that institution, there exists absolutely no statutory provision permitting subsequent sub-delegation. The attempted sub-delegation by Commissioner Duheme, purportedly while “on duty,” to subordinate officers absent strict adherence to the statutory delegation framework invokes the fatal application of the maxim *delegatus non potest delegare*.

B. ABSOLUTE LIABILITY FOR THE REFUSAL TO SEARCH AND THE FIPPA DISTINCTION

160. Section 74 of the *Privacy Act* constructs a highly specialized liability paradigm, sheltering the Head of the Government Institution from civil or criminal proceedings strictly in instances characterized by the disclosure of personal information executed in good faith, or for consequences flowing from that disclosure, or the failure to give notice if reasonable care is taken.
161. The application of the maxim *expressio unius est exclusio alterius*—the explicit mention of one thing is the exclusion of another—dictates that liability definitively attaches to the deliberate failure or refusal to execute a search.
162. This deliberate federal legislative drafting, and the profound legal distinction distinguishing it from provincial regimes, is starkly illuminated when subjected to comparative statutory analysis:

Jurisdiction	Governing Legislation	Extent of Statutory Protection from Civil Proceedings
Federal	<i>Privacy Act</i> , R.S.C., 1985, c. P-21, s. 74	Protection is strictly limited to the disclosure in good faith of personal information, or the failure to give notice if reasonable care is taken. Absolutely no protection is afforded for non-disclosure, a failure to disclose, or a refusal to search.

British Columbia	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.B.C. 1996, c. 165, s. 73(1)(a)	Protection is explicitly granted for damages resulting from the disclosure, or failure to disclose, in good faith. Consequences of non-disclosure are statutorily shielded.
Ontario	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.O. 1990, c. F.31, s. 62(2)	Protection is explicitly granted for damages resulting from the disclosure or non-disclosure in good faith of a record.

163. It is a critical, devastating legal distinction that under the federal *Privacy Act*, “non-disclosure” is definitively not protected. Section 74 provides absolutely no safe harbor for a failure to search, a failure to disclose, a refusal to disclose, a refusal to search, a refusal to consider, a refusal to apply paragraph 8(2)(m), a refusal to retain records, or a refusal to notify the Privacy Commissioner. Conversely, provincial statutes explicitly and legislatively protect non-disclosure. The Parliament of Canada deliberately excluded such protections, imposing direct, personal liability upon the Head of the Government Institution.

164. Consequently, the deliberate circumvention of the investigatory phase—specifically the administrative refusal to search—functions analogously to a lesser included infraction inherently subsumed within the broader prohibition against the refusal to disclose. Ergo, absolute liability conclusively attaches for the deliberate act of *not* searching, which *ipso facto* constitutes the act of *not* disclosing. It represents the absolute zenith of bad faith within this statutory context.

VOLUME 12: THE QUASI-CONSTITUTIONAL NATURE OF PRIVACY RIGHTS AND THE LESSER INCLUDED INFRACTION

A. THE NARROW CONSTRUCTION OF EXCEPTIONS

165. The overarching purpose of access to information rights is to facilitate democracy by ensuring that citizens possess the information required to participate meaningfully in the democratic process. Concurrently, privacy rights are fundamentally designed to protect the autonomy, integrity, and dignity of the individual with respect to personal information held by government institutions. Such rights are unequivocally quasi-constitutional in nature.

166. As articulated by the Supreme Court of Canada in *Lavigne v. Canada (Office of the Commissioner of Official Languages)*, 2002 SCC 53 (the “*Lavigne Decision*”), any exceptions from the access rights set out within the legislation must be interpreted narrowly, with any resulting ambiguity resolved definitively in favour of preserving the right of the applicant. The burden of persuasion perpetually resides upon the institution or person asserting the exception.

167. Furthermore, as governed by *Dagg v. Canada (Minister of Finance)*, [1997] 2 S.C.R. 403 (the “*Dagg Decision*”), privacy rights represent a fundamental value in modern democracies, inextricably linked to the protections enshrined within sections 7 and 8 of the *Canadian Charter of Rights and Freedoms*. Such rights may only be compromised in the presence of a demonstrably compelling state interest, firmly placing the onus upon the state to justify any deprivation or withholding of information.

<i>B. DISTINGUISHING SUBSTANTIVE DUTIES FROM PROCEDURAL NON-RESPONSES (THE O'DRISCOLL DISTINCTION)</i>

168. It is anticipated that dilatoriness may be improperly shielded by the Respondents' reliance upon *O'Driscoll v. Canada (Royal Canadian Mounted Police)*, 2024 FC 1660 (the “*O'Driscoll Decision*”). Such reliance is fundamentally misplaced, logically incoherent, and legally erroneous. The distinction between the factual matrix of the *O'Driscoll Decision* and the present proceeding is surgically precise and legally devastating.

169. In the *O'Driscoll Decision*, the Federal Court concluded that a mere non-response to an informal electronic correspondence did not constitute a reviewable, rights-affecting administrative decision. Crucially, in that matter, the Commissioner possessed no statutory duty to respond to an email; no formal request under section 12 of the *Privacy Act* was initiated, no statutory obligation was triggered, no refusal to search was executed, and no analysis pursuant to paragraph 8(2)(m) was necessitated.

170. Conversely, the present proceeding involves the formal, statutory invocation of sections 12, 14, 15, 16, 8(2)(m), 8(4), 8(5), 9, and 10 of the *Privacy Act*. Consequently, Commissioner Duheme and his subordinate delegates are inextricably bound by mandatory, positive duties to search, consider, retain, notify, decide, disclose or refuse, justify said refusal, and formally notify the Privacy Commissioner. The deliberate evasion of these

cascading statutory mandates cannot be conflated with the mere administrative non-response adjudicated in the *O’Driscoll Decision*.

VOLUME #13: THE INAPPLICABILITY OF THE CROWN LIABILITY AND PROCEEDINGS ACT TO JUDICIAL REVIEW REMEDIES

A. MANDAMUS AND STATUTORY COMPLIANCE VERSUS TORTIOUS LIABILITY

171. It is of paramount importance to strictly delineate the jurisdictional boundaries of the present application. This proceeding is fundamentally anchored in administrative law, operating strictly as an application for judicial review seeking the prerogative writ of *mandamus*. The overarching objective is to compel strict compliance with the positive statutory mandates enshrined within the *Privacy Act*, specifically the duty to execute an exhaustive search and the non-delegable obligation to consider public interest disclosures pursuant to paragraph 8(2)(m).
172. Consequently, the liability paradigm constructed under the *Crown Liability and Proceedings Act*, RSC 1985, c C-50 (the “*CLPA*”), possesses absolutely no relevance to the present adjudicative matrix. Section 2 of the *CLPA* explicitly circumscribes “liability” strictly to extracontractual civil liability in the Province of Quebec, and liability in tort in any other province. Furthermore, paragraph 3(b) predicates Crown liability upon torts committed by a servant or breaches of duty attaching to the ownership, occupation, possession, or control of property. While the jurisprudential classification of personal information as tangible property remains a highly contestable legal frontier, such determinations belong strictly to the realm of civil damages and are entirely premature within this administrative review.
173. This critical distinction similarly neutralizes the premature invocation of sections 10 and 36 of the *CLPA*. Section 10 dictates that no proceedings lie against the Crown for the acts of a servant unless said act would have given rise to a cause of action against the servant personally. Concurrently, section 36 deems members of the Royal Canadian Mounted Police to be servants of the Crown for the purposes of determining liability.
174. While it remains entirely plausible, and indeed forcefully submitted, that the Head of the Government Institution, or his purported delegates, could incur personal tortious liability for acting in bad faith by deliberately failing to search and failing to disclose—absent the statutory shield of section 74 of the *Privacy Act*—that inquiry

remains extrinsic to the present judicial review. The current proceeding is not engaged with quantifying damages or assigning tortious liability to servants of the Crown; rather, it is laser-focused upon compelling the immediate, unadulterated performance of mandatory statutory duties.

VOLUME #14: THE PIERCING OF ADMINISTRATIVE PRIVILEGE AND THE PRESERVATION OF INSTITUTIONAL INDEPENDENCE

A. THE DICHOTOMY BETWEEN ADJUDICATIVE AND ADMINISTRATIVE PRIVILEGE

175. It is anticipated that the compelled forensic production and systemic unsealing mandated within the relief sought herein may provoke objections anchored in the doctrines of judicial or adjudicative privilege. Such resistance is fundamentally misdirected, predicated upon a severe conflation of adjudicative privilege with administrative immunity.

176. As definitively articulated by the Supreme Court of Canada in *MacKeigan v. Hickman*, [1989] 2 S.C.R. 796 (the “*MacKeigan Decision*”), a strict jurisprudential dichotomy must be recognized between the adjudicative functions of a tribunal and its administrative mechanics. Adjudicative privilege, safeguarding the internal deliberations, mental processes, and substantive reasoning of a jurist, operates as an absolute shield. Conversely, administrative privilege—encompassing the mechanics of court registries, the assignment of dockets, the transmission of digital instruments, and the employment credentialing of registry personnel—is inherently qualified. It serves as a mere adjunct to adjudicative independence and is subject to superseding public interest imperatives.

B. THE QUALIFIED NATURE OF ADMINISTRATIVE PRIVILEGE AND EXCEPTIONAL CIRCUMSTANCES

177. The forensic production sought herein—specifically encompassing electronic EFS transmission logs, third-party software signatures, the unsealing of the antecedent T-4313-25 file, and registry employee rosters—falls strictly within the administrative ambit. As corroborated by the dissenting and concurring rationales of Cory J. and Wilson J. in the *MacKeigan Decision*, qualified administrative privilege must yield when the public interest in the administration of justice and the preservation of institutional integrity are overwhelmingly engaged. The incontrovertible discovery of a fabricated judicial instrument bearing a cloned file identifier constitutes the absolute zenith of “exceptional circumstances” mandating administrative disclosure.

178. Furthermore, when systemic anomalies precipitate the deprivation of fundamental rights, the injured citizen's infeasible right to a remedy supersedes qualified administrative immunities. As illuminated in *R. v. Germain, 1984 CanLII 1205 (AB QB)* (the "*Germain Decision*"), when a constitutional infringement is structurally facilitated by the adjudicative apparatus itself, relief must be fashioned against the state to preserve constitutional integrity. The compelled production of the administrative records imposes no personal tortious liability upon any jurist, thereby fully preserving the sacrosanct doctrine of judicial immunity from civil suit, whilst simultaneously ensuring that the administration of justice is not utilized as a clandestine shield for institutional malfeasance.

C. EXECUTIVE USURPATION AND THE PROTECTION OF INSTITUTIONAL INDEPENDENCE

179. The structural independence of the judiciary, codified within the Judicature Sections of the *Constitution Act, 1867*, 30 & 31 Vict, c 3, necessitates that the courts remain completely separate in authority and function from all other participants in the justice system (*Beauregard v. Canada, [1986] 2 S.C.R. 56* (the "*Beauregard Decision*")). This institutional independence is predicated upon three foundational pillars: security of tenure, financial security, and administrative independence (*Valente v. The Queen, [1985] 2 S.C.R. 673* (the "*Valente Decision*")).

180. The zenith of administrative independence necessitates absolute insulation from executive interference. The incontrovertible cryptographic metadata extracted herein establishes that executive branch actors—specifically agents operating under the aegis of the Attorney General—clandestinely penetrated the administrative registries, utilizing cloned tax litigation templates to synthesize a false judicial directive. Consequently, the disclosure of the EFS administrative audit trails and network logs is definitively not an intrusion upon judicial independence; rather, it operates as the imperative, surgical mechanism required to protect the proper functioning of the judiciary from insidious executive usurpation. Disclosure of the administrative *acta* becomes the very shield required to preserve the institutional independence it was originally designed to protect.

VOLUME #15: EQUITABLE PRINCIPLES GOVERNING INJUNCTIVE RELIEF AND THE DOCTRINE OF IRREPARABLE HARM

181. The Applicant respectfully advances that while the Federal Court of Canada ought not to regularly entertain interim injunctive relief motions as a matter of routine administrative procedure, the unique, unprecedented, and mathematically verifiable circumstances of institutional fraud delineated herein constitute the precise paradigm demanding superseding equitable intervention.
182. It is advanced, relying upon the seminal scholarly contributions of the Honourable Mr. Justice Paul M. Perrell (as he now is), articulated within his 1989 publication in the *Canadian Bar Review* titled “The Interlocutory Injunction and Irreparable Harm” (the “Justice Perrell Article”), that the concept of irreparable harm is a critical foundational element in the test for granting an interlocutory injunction. As masterfully elucidated within the Justice Perrell Article, irreparable harm originally manifested as a strict principle of equity: equity would not intervene if the common law remedy was deemed adequate.
183. Consequently, in the modern adjudicative context of injunctions, irreparable harm is fundamentally concerned with the inadequacy of damages. The core meaning of irreparable harm establishes that the injury sustained, combined with the structural delays inherently characteristic of the administration of justice, cannot be adequately compensated for, nor overcome by, a mere award of money or any other retrospective remedy pronounced at trial. The word “just” inherently connotes equity.
184. As Sachs L.J. of the English Court of Appeal observed in *Evans Marshall C&R Co. Ltd. v. Bertola SA* (the “*Evans Marshall Decision*”), the standard inquiry regarding the adequacy of damages might be appropriately reframed to ask: “Is it just, in all the circumstances, that a plaintiff should be confined to his remedy in damages?” Given that damages are awarded strictly post-trial and are unsuited to rectifying ongoing interlocutory prejudice, it is a logical imperative that the inadequacy of damages operates as the true measure of the necessity for interlocutory relief.
185. The epistemological divide between a “substitutional” common law remedy (a liability rule) and an equitable remedy (a property rule) is paramount. A liability rule effectively permits a wrongdoer to appropriate an entitlement at the cost of the court's assessment of value. Conversely, a property rule dictates that an entitlement cannot be expropriated absent the holder's consent. Professor Sharpe approaches the absolute zenith of this principle

by affirming that when injunctions are sought in relation to the restraint of interference with property rights, they are so strongly favored that it is more accurate to categorize the injunction as the “presumed remedy.”

B. APPLICATION OF EQUITABLE PRINCIPLES TO THE PRESENT JURISDICTIONAL NULLITY

186. Moving the investigation beyond the strict confines of contract law, the jurisprudence governing the law of nuisance illuminates the profound inadequacy of common law damages when contrasted against injunctive relief. In cases characterized by a continuing nuisance, a permanent injunction formally recognizes the unadulterated extent of the applicant's rights and forcefully arrests the continuance of the injury. Utilizing the “working rule” articulated by A.L. Smith L.J. in *Shelfer v. City of London Electric Lighting Co.* (the “*Shelfer Decision*”), damages in substitution for an injunction may only be awarded if the injury is small, capable of monetary estimation, adequately compensated by a minor payment, and if the granting of an injunction would be oppressive to the defendant.

187. The precise nature of the harm currently being suffered by the Applicant fundamentally resists any monetary quantification. In the context of the present administrative proceeding, absolutely no damages or financial compensation are sought, nor could they be lawfully procured within the strict parameters of an application for judicial review seeking *mandamus*. Ergo, the inadequacy of damages is structurally absolute.

188. Furthermore, as explicitly affirmed by the Federal Court of Appeal in *Glooscap Heritage Society v. Canada (National Revenue)*, 2012 FCA 255 (the “*Glooscap Decision*”), echoing the precedential guidance established in *Centre Ice Ltd. v. National Hockey League*, [1994] F.C.J. No. 68 (the “*Centre Ice Decision*”), irreparable harm strictly necessitates “clear and convincing evidence,” precluding reliance upon mere speculation. The term “irreparable” refers specifically to the *nature* of the harm suffered, rather than its sheer magnitude. The harm inflicted herein—specifically the ongoing deprivation of the unadulterated Certified Tribunal Record and the clandestine utilization of the administrative apparatus to conceal the overarching fraudulent nexus to TDGIC—is mathematically verifiable and categorically incurable via subsequent monetary awards.

C. THE BALANCE OF CONVENIENCE

189. The final branch of the tripartite test, the balance of convenience, operates as a jurisprudential foregone conclusion heavily favoring the Applicant. As repeatedly affirmed by this Honourable Court, adopting the explicit directives of the Supreme Court of Canada in *RJR - MacDonald Inc. v. Canada (Attorney General)*, [1994] 1 S.C.R.

311 (the “RJR Decision”) and *Manitoba (Attorney General) v. Metropolitan Stores Ltd.*, [1987] 1 S.C.R. 110 (the “Metropolitan Stores Decision”), this branch requires a strict determination of which party will suffer the greater harm from the granting or refusal of the injunction pending a decision on the merits.

190. It is submitted that compelling the Respondents to adhere to their absolute statutory obligations under the *Privacy Act* and strictly preventing the further spoliation or manipulation of the adjudicative record imposes precisely zero oppressive burden or cognizable harm upon the state. Conversely, the refusal of the injunctive relief sought will inevitably facilitate the irreversible corruption of the judicial record and the complete vitiation of procedural fairness.

VOLUME #16: THE INAPPLICABILITY OF THE DE FACTO OFFICER DOCTRINE AND THE
USURPATION OF JURISDICTION

A. THE ABSOLUTE PRECLUSION OF THE DE FACTO OFFICER DOCTRINE

191. It is anticipated that the structural anomalies and jurisdictional usurpations identified herein might be improperly defended through a misapplication of the *de facto* officer doctrine. Such an invocation is fundamentally legally bankrupt. While the *de facto* doctrine serves to validate the actions of an official possessing a colorable, plausible right to an office to protect public reliance, it is absolutely precluded from shielding the clandestine machinations of total strangers who completely usurp adjudicative power.
192. As articulated by the Supreme Court of Canada in *McLean v. Bradley*, 1878 CanLII 22 (SCC), and subsequently reaffirmed by Anglin C.J.C. in *Pong v. Quong*, 1927 CanLII 2 (SCC), the validating shield of the *de facto* doctrine strictly necessitates three inflexible prerequisites: the color of title, actual possession of the office, and public reliance. The doctrine inherently fails to protect acts executed by individuals who seize power absent any foundational statutory mandate or assigned adjudicative office.
193. In the present adjudicative matrix, Justice Whyte Nowak possessed absolutely no “office” in relation to this specific proceeding, having never been lawfully seized of the matter pursuant to the *Federal Courts Rules*. Concurrently, the proxy registry staff facilitating the synthetic directive operated outside any colorable authority. Consequently, the synthesis of the Justice Whyte Nowak July 2 Purported Direction (FALSE DOCUMENT) was

executed by actors functioning as total strangers to the procedural docket, rendering the *de facto* officer doctrine wholly inapplicable and cementing the instrument as an absolute, incurable nullity.

VOLUME #17: THE FEDERAL COURT’S LACK OF INHERENT JURISDICTION AND THE SUPREMACY OF LEGISLATIVE WILL

A. THE STATUTORY BOUNDARIES OF THE FEDERAL COURT AND THE BAXTER DECISION

194. The Applicant forcefully submits that the Federal Court of Canada, constituted strictly as a statutory court pursuant to section 101 of the *Constitution Act, 1867*, 30 & 31 Vict, c 3, fundamentally lacks the sweeping, inherent jurisdiction historically vested in provincial superior courts under section 96. Its adjudicative authority is rigidly circumscribed by the parameters expressly conferred by the Parliament of Canada, supplemented solely by the implied jurisdiction strictly necessary to govern its own internal processes.
195. Consequently, any postulation that the *ultra vires* directives, procedural usurpations, or administrative irregularities identified herein might be sanitized or retroactively validated through a generalized invocation of “inherent jurisdiction” is legally bankrupt and fundamentally inoperable.
196. Furthermore, even if such inherent jurisdiction could be theoretically engaged by this Honourable Court, it operates as an inviolable axiom of Canadian jurisprudence that inherent powers can never be utilized to override, contradict, or negate the unambiguous expression of legislative will. As definitively articulated by the Supreme Court of Canada in *Baxter Student Housing Ltd. v. College Housing Co-operative Ltd.*, [1976] 2 S.C.R. 475 (the “*Baxter Decision*”), the inherent jurisdiction of a tribunal “is not such as to empower a judge... to make an order negating the unambiguous expression of the legislative will.”
197. Ergo, the explicit, mandatory statutory duties imposed upon the Head of the Government Institution under the *Privacy Act*—coupled with the precise procedural strictures codified within the *Federal Courts Rules*—cannot be bypassed, modified, or extinguished by phantom invocations of inherent judicial authority. Any procedural maneuver or direction purporting to relieve the Respondents of their strict legislative obligations, or validating the clandestine circumvention of formal motion requirements, constitutes an absolute jurisdictional nullity.

VOLUME #18: CONCLUSION AND EVIDENTIARY THRESHOLD

198. The procedural and substantive nullities identified herein—ranging from the structural falsification of the directive to the statutorily impermissible refusal to search—have been established via incontrovertible documentary evidence. The extraction of the third-party manipulation software signatures definitively establishes that the administrative apparatus was compromised.

199. The adjudicative threshold governing this administrative review is the balance of probabilities. It is respectfully submitted that the provision of clear, cogent, and mathematically verifiable cryptographic evidence establishing bad faith, forgery, and the absolute deprivation of procedural fairness easily surpasses the fifty-one to forty-nine percent threshold required to substantiate the averments detailed herein.

VOLUME #19: ORDERS SOUGHT

A. FOUNDATIONAL ADJUDICATIVE ORDERS AND APEX SUPERVISORY DECLARATIONS

200. Predicated upon the exhaustive legal syllogisms and the unassailable evidentiary record detailed herein, an Order is respectfully sought granting the full spectrum of declaratory and injunctive relief delineated within the Third Notice of Motion. Specifically, the following procedural relief is mandated *in limine* in his NOM #3 of May 14, 2026.

ALL OF WHICH IS FORMALLY SUBMITTED.

Dated at the City of Toronto, in the Province of Ontario, on this 21st day of July, 2026.

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

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

UNDERTAKING AS TO DAMAGES

The applicant, Kevin A. McLean (the “Applicant”), hereby formally provides an irrevocable undertaking to abide by any order concerning damages that this Honourable Court may strictly make if it is ultimately determined that the granting of any injunctive or supervisory relief sought herein has caused actionable damage to the Respondents, or any of them, or non-Respondents, for which the Applicant ought appropriately and equitably to compensate them.

A handwritten signature in black ink, appearing to be 'K. McLean', is written over a horizontal line.

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

APPENDICES

APPENDIX A: DOCUMENTARY EVIDENCE AND CORRESPONDENCE FROM JULY 20, 2026 TO THE HONOURABLE ATTORNEY GENERAL OF CANADA AND THREE COUNSEL ALONG WITH MS. ALAINA LAM

Attached hereto and forming an integral component of these written representations are the foundational documentary exhibits, authenticated correspondence, and extracted cryptographic metadata logs relied upon to substantiate the averments of institutional fraud, statutory contraventions, and the absolute vitiation of procedural fairness detailed herein. This compendium explicitly encompasses the unredacted digital transmission ledgers and the comparative forensic analyses exposing the synthetic manipulation of the judicial record.

ⁱ <https://www.fct-cf.ca/en/pages/about-the-court/members-of-the-court/judges/the-honourable-alan-s-diner>



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

URGENT - Formal Demand for the Production of Authentic COURT Documents (AVAILABLE TO THE PUBLIC AT LARGE) and the Immediate Cessation of Ultra Vires Machinations

2 messages

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

Mon, Jul 20, 2026 at 12:28 AM

To: mcu@justice.gc.ca, webadmin@justice.gc.ca, "jake.norris@justice.gc.ca" <jake.norris@justice.gc.ca>, "Continelli, Nick" <nick.continelli@justice.gc.ca>, tyler.alviano@justice.gc.ca
Cc: "alaina.lam@justice.gc.ca" <alaina.lam@justice.gc.ca>

Reply to: Mr. Kevin A. McLean (BA, JD, CIM)

Reply via email: mclean@searchandseizure.ca

Date: July 19, 2026

Classification: Private and Confidential

Sending method: Via Email at first instance (other modes may follow)

TO:

Attorney General of Canada (The Honourable Mr. Sean Fraser)

Department of Justice Canada

284 Wellington Street

Ottawa, Ontario, K1A 0H8

Minister/Attorney General Office Email: mcu@justice.gc.caGeneral Department Email: webadmin@justice.gc.ca

Office Fax: 1-613-957-3559

Mr. Jacob Norris

Email: jake.norris@justice.gc.ca

Department of Justice Canada, Ontario Regional Office

120 Adelaide Street West, Suite 400

Toronto, Ontario

Mr. Nick Continelli

Email: nick.continelli@justice.gc.ca

Department of Justice Canada, Ontario Regional Office

120 Adelaide Street West, Suite 400

Toronto, Ontario

Mr. Tyler Alviano

Email: tyler.alviano@justice.gc.ca

Department of Justice Canada, Ontario Regional Office

120 Adelaide Street West, Suite 400

Toronto, Ontario

Copied to: Ms. Alaina Lam

SUBJECT I: FORMAL DEMAND FOR THE PRODUCTION OF AUTHENTIC COURT DOCUMENTS (AVAILABLE TO THE PUBLIC AT LARGE) AND THE IMMEDIATE CESSATION OF ULTRA VIRES MACHINATIONS

SUBJECT II: NOTIFICATION OF IMMINENT ESCALATION TO THE CHIEF JUSTICE OF THE SUPERIOR COURT OF JUSTICE AND OTHER AUTHORITIES/BODIES SHOULD THEY NOT BE DISCLOSED ON OR BEFORE NOON TOMORROW

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

PART I: PRIMARY DEMAND, INTRODUCTION, AND THE VITIATION OF JURISDICTION

- 1. Take explicit and irrevocable notice:** It is strictly demanded that the addressed entities produce, or cause to be produced forthwith, the requested court records (the "Requested Court Records"), specifically encompassing the authentic information package (the "Authentic Information Package"), strictly inclusive of the unadulterated criminal code form 2 information (the "Criminal Code Form 2 Information") and/or the criminal code form 4 indictment (the "Criminal Code Form 4 Indictment"), alongside any and all true originating intake court endorsements (the "Intake Court Endorsements"), by no later than noon tomorrow, July 20, 2026.
- Correspondence is hereby initiated regarding the aforementioned subjects. A formal, irrevocable, and coercive demand is articulated herein for the immediate production of highly specific, unadulterated evidentiary and requested court records. The deliberate deprivation of these foundational materials constitutes an absolute nullity, operating as a direct abrogation of the core tenets of Canadian jurisprudence and effectuating a profound usurpation of the rule of law. It is submitted that the absolute integrity of the judicial record remains the paramount bedrock of the administration of justice, serving as the singular bulwark against the arbitrary exercise of state power and the clandestine weaponization of the judicial apparatus.
- The overarching equitable and common law maxim of *fraus omnia corrumpit* dictates that any subsequent proceedings, procedural maneuvers, or deprivations of liberty predicated upon a mathematically and forensically verifiable *fraud upon the court* are rendered irrevocably *void ab initio*. Such systemic subversions cannot be cured by subsequent administrative acquiescence; rather, they operate to vitiate the foundational jurisdiction of the tribunal entirely.
- The agents of the Attorney General of Canada are strictly bound by an elevated fiduciary, ethical, and constitutional duty to the administration of justice, functioning as the indispensable gatekeepers of prosecutorial fairness. When the coercive powers of the state are mobilized based upon manufactured instruments that deliberately bypass mandatory statutory gateways, the resulting deprivation of liberty transcends a mere procedural irregularity and crystallizes into a profound jurisdictional nullity that demands immediate remedial intervention.
- Furthermore, it is unequivocally asserted that the Attorney General of Canada, functioning strictly as an apparatus of the federal executive branch, is absolutely precluded from attempting to usurp the inherent duties, powers, and exclusive jurisdiction of a Superior Court—a constitutionally protected "Section 96 Court" under the *Constitution Act, 1867*. Any

calculated endeavor by executive agents to induce breaches of the aforementioned judicial duties and powers operates as a constitutional nullity of the highest order, striking at the very independence of the judiciary. This strict preclusion extends absolutely to the inducement, facilitation, or orchestration of any breaches of the *Administration of Justice Act* and the attendant regulation(s) promulgated thereunder. The systemic and administrative sanctity of the judicial apparatus must remain inviolate against executive overreach.

PART II: THE IMPERATIVE DEMAND FOR PRODUCTION, FORENSIC DISCLOSURE, AND SYSTEMIC TRANSPARENCY

6. It is strictly demanded that the addressed entities produce, or cause to be produced (whether through direction, instruction, advice, or counsel), any of the individuals who maintain a form of possession, constructive possession, or systemic control over the following Requested Court Records, acknowledging the specific distinction between requested court records and authentic judicial documents as codified within the Auditor General of Ontario reports in 2019:

- a. The Authentic Information Package, strictly devoid of the structural, visual, and cryptographic metadata anomalies introduced via third-party digital manipulation, unauthorized algorithmic flattening, and deliberate vector compression executed outside the secure, electronically monitored parameters of the Courts Administration Service intranet;
- b. The Criminal Code Form 2 Information and/or the Criminal Code Form 4 Indictment originating from 2024, presumably instantiated within the temporal parameters of August to October 2024. These represent the exclusive, true statutory instruments required to lawfully initiate a criminal proceeding under the *Criminal Code*, necessitating an oath sworn before a recognized, legally appointed jurist operating within the appropriate territorial and subject-matter jurisdiction, completely severed from the irregular triage mechanisms subsequently employed;
- c. Any orders, decisions, or other dispositions made, given, issued, or otherwise endorsed that stand in direct contradistinction to the intake court endorsement (the "Intake Court Endorsement") dated September 23, 2024. It is formally noted that such an endorsement is structurally incompatible with the *Criminal Proceedings Rules* of the Ontario Court of Justice and operates as an absolute nullity within the context of a federal policing action;
- d. The nominal identification of the legal counsel who acted as the active agent, architect, or facilitator on behalf of the "law enforcement applicant" operating under the statutory mantle of the Attorney General of Canada, thereby invoking the definitions and statutory obligations enshrined within the *Director of Public Prosecutions Act*;
- e. Exhaustive particulars, inclusive of, but not limited to, the precise dates, temporal timestamps, and security access logs of their attendance before a Judge of the Superior Court of Justice. This demand is formulated while explicitly appreciating the distinct improbability that any legitimate attendances transpired within the standard Criminal E-Intake Portal before an Ontario Court of Justice Judge or a Justice of the Peace. Furthermore, it is acknowledged that Justice of the Peace Mr. Jiri maintained absolutely no involvement at the relevant temporal juncture, yet may have subsequently acquiesced to his nomenclature being fraudulently utilized as the fictitious judicial officer to artificially sanitize an extracurial jurisdictional nullity;
- f. The explicit identification of the individuals who physically or remotely attended in chambers, a severe procedural circumvention that bypassed the public docket entirely and was subsequently admitted and affirmatively represented by Ms. Nivatha Amirthalingam of the Superior Court of Justice Regional Manager's Office. This explicitly includes the required identification of any municipal decoy informants;
- g. The nominal identification of the true affiant and informant, presuming it remains unequivocally established within the unredacted historical metadata as regional commander mr. matt peggs (the "Regional Commander Mr. Matt Peggs") of the Royal Canadian Mounted Police, acting in his official capacity as the commanding officer of the Central Region, who purportedly executed a remote declaration at approximately 11:43 a.m. on September 23, 2024;

- h. The nominal identification of the jurist giving, issuing, endorsing, or making the order or the aforementioned Intake Court Endorsement, acknowledging that such terse, handwritten endorsements operate structurally as a creature of commercial insolvency, bankruptcy, or family law triage rather than standardized, publicly docketed criminal procedure, and acknowledging the explicit, *in camera* involvement of Chief Justice Geoffrey B. Morawetz (as he then was);
- i. Any and all typologies of warrants made, given, issued, or otherwise endorsed in either oral or documentary manifestations, inclusive of all granular particulars. This strictly requires the unredacted production of the Canadian police information centre metadata (the "Canadian Police Information Centre Metadata"), specifically encompassing the raw hexadecimal ledger dumps, Originating Agency Identifiers, System Identification Numbers, and all recorded ADD, MODIFY, CLEAR, and CANCEL transactions within the offline historical database pertaining to the police case id 457197 (the "Police Case ID 457197").

PART III: TIMELINE, APPELLATE MECHANISMS, AND IRREVOCABLE CONSEQUENCES

7. The inflexible temporal mandate for the fulfillment of these strict evidentiary obligations is established precisely at noon tomorrow, July 20, 2026. Failing absolute and strict compliance with this deadline, aggressive, relentless, and active measures shall be undertaken to draw this profound jurisdictional usurpation to the immediate, undivided attention of the Chief Justice of the Superior Court of Justice, Chief Justice Boucher.
8. This escalation shall be executed in tandem with concurrent, formalized notifications to the administrative registries and commanding jurists of the Federal Court of Canada, the Federal Court of Appeal, and the Tax Court of Canada, explicitly acknowledging the highly irregular, cross-departmental intermingling of the latter's digital administrative templates within this specialized, unrelated proceeding.
9. A formal, exhaustive complaint has previously been transmitted to the Canadian Judicial Council. This transmission was predicated upon the foundational, immutable maxim that it remains the non-delegable, positive responsibility of the presiding judge to ensure that any instrument issued in their nomenclature reflects strict factual actuality and adheres rigorously to established rules of practice. It must be emphasized with absolute clarity that Justice Whyte Nowak was not lawfully "presiding" over this matter, as she possessed no lawful assignment to the docket, nor did the capacity to self-assign exist under the framework of the *Federal Courts Rules*.
10. Irrespective of the voluminous quantum of forgery, falsification, fabrication, distortion, alteration, and/or deception that demonstrably transpired—as witnessed with the structural manipulation of the Authentic Information Package and the subsequent generation of the justice whyte nowak july 2 purported direction (the "Justice Whyte Nowak July 2 Purported Direction"), which exists as a legally indisputable false document—such machinations undertaken by extrinsic actors mandate severe judicial scrutiny. A legitimate Judge of the Federal Court of Canada must explicitly authorize a document's dissemination, irrespective of the physical lack of a signature.
11. Further supplementary complaints targeting the systemic deprivation of procedural fairness, the blatant abuse of process, the misapplication of administrative law principles, and the incontrovertible orchestration of a fraud upon the tribunal are being drafted concurrently with this correspondence. Consequently, the trajectory, velocity, and ultimate severity of these subsequent filings will remain entirely contingent upon the substantive nature of the response remitted herein.
12. The explicit attention of the Chief Justice shall be forcefully directed toward the binding, paramount appellate jurisprudence of *Ontario (Criminal Code Review Board) v. Hale* and *Canada Post Corp. v. Canada (Minister of Public Works)*. These binding precedents irrevocably reinforce the foundational principle that the Superior Court of Justice maintains

inherent jurisdiction and absolute, constructive control over Requested Court Records and their underlying systemic metadata in the event of deliberate alteration, spoliation, or purportedly anomalous technological glitches.

13. Should you disagree with any of the averments, evidentiary conclusions, cryptographic metadata deductions, visual heraldry analyses, or factual assertions delineated within this correspondence, an open, formal invitation is hereby extended to the addressed legal counsel to correct the record, as these proceedings cannot be conducted in the dark. Desperate times have evidently necessitated desperate, *ultra vires* measures.

PART IV: FACTUAL MATRICES, CIVIL GENESIS, JURISDICTIONAL SHOPPING, AND THE DEPRIVATION OF JURISDICTION

14. A meticulous, granular deconstruction of the labyrinthine web of institutional actors and the intricate architecture of complicity defining this proceeding has been executed. The transition from a dismissed municipal police call anchored in a localized civil disagreement to a weaponized federal enforcement action required a profound circumvention of established criminal procedure. This extra-procedural trajectory resulted in the generation of an instrument that is, as a matter of strict constitutional and administrative law, absolutely *coram non jndice*.

15. It is self-evident, based upon the chronological sequencing of events, that no legitimate municipal law enforcement entity maintained the conviction that any of the preceding charges possessed substantive merit. Indeed, they were completely *void ab initio* at the precise chronological moment the Authentic Information Package was digitally and fraudulently falsified into the subsequent deceptive iteration, rendering the subsequent deprivation of liberty a profound violation of fundamental *Charter* protections against arbitrary detention and malicious prosecution.

16. The genesis of this jurisdictional anomaly was anchored deeply in a protracted, localized, and highly personal civil dispute characterized by pronounced familial animus. The campaign to forcefully effectuate an eviction culminated in desperate, *ex parte* motions brought before the Landlord and Tenant Board on August 20, 2024, which were summarily and unequivocally denied by the adjudicator due to an absolute deficiency of evidentiary merit.

17. Following the catastrophic failure to weaponize civil tribunal mechanisms, municipal law enforcement was summoned on September 15, 2024. Detective Constable Eric Tang (Badge #10942) of the Toronto Police Service (TPS) 14th Division appropriately assessed the localized dispute as entirely civil in nature and declined to initiate any criminal proceedings whatsoever. This initial municipal refusal to criminalize a tenancy conflict was subsequently reinforced by representations made directly by TPS Officer Javier Solermo on September 21, 2024, who explicitly confirmed that the TPS did not involve itself in the unlawful lockouts (pertaining to both the residential FOB and the physical apartment door) executed the preceding day.

18. Confronted with the absolute, principled refusal of the TPS 14th Division, the orchestrating actors engaged in an orchestrated, desperate campaign of multi-jurisdictional forum shopping. The Ontario Provincial Police (OPP) similarly assessed the matter and refused to intervene, a stance explicitly confirmed by the OPP's documented denial of any association with the Police Case ID 457197.

19. The desperate escalation manifested as a highly coordinated effort to bypass municipal and provincial safeguards to manufacture an extracurial deprivation of liberty by invoking the coercive apparatus of the federal state. When analyzing the language deliberately injected into Ms. Aphrodite Artopoulos's requests for expedited tribunal hearings—specifically asserting fabricated allegations of "drugs and theft"—it becomes evident this was a calculated maneuver designed to fit squarely within the specialized, statutorily defined mandate of the Royal Canadian Mounted Police (RCMP) Central Region, specifically the Toronto West Detachment (Milton Detachment) located at 2755 Highpoint Drive.

20. The Milton Detachment maintains exclusive responsibility for the enforcement of federal statutes in the downtown Toronto core and the western region of the Greater Toronto Area, operating heavily within the Criminal Intelligence Branch, Financial Crime, and Serious & Organized Crime frameworks. The invocation of narcotics was the artificial key utilized to unlock federal jurisdiction over a residential lease dispute. This jurisdictional nexus definitively explains the fictitious utilization of Justice of the Peace Mr. Jiri, as Brampton (Halton Region) maintained no lawful territorial jurisdiction whatsoever over the matter. The post-hoc deployment of a "No Fixed Address" (NFA) designation, despite the state possessing valid provincial driving credentials establishing residency, was an artificial construct designed strictly to furnish colour of right to a fundamentally nefarious deployment.

PART V: UNREDACTED METADATA, INSTITUTIONAL COMPLICITY, AND THE ANATOMY OF THE SUBVERSION

21. The vacuity of the fabricated law enforcement application was laid bare upon the un-redaction of the Centre for Addiction and Mental Health (CAMH) photographic evidence on May 4, 2025. This critical un-redaction definitively established that Mr. David Karat—having traveled from outside municipal boundaries (Oshawa or Markham) specifically to participate in the aforementioned theft of personal property on October 25, 2024—was physically hiding within the secured, highly restricted, and locked confines of the CAMH TIDES classroom.

22. This highly irregular access was facilitated by an incontrovertible conflict of interest involving Ms. Dorothy During-Gibbs, a CAMH social worker whose husband, Mr. Michael Gibbs (son of Peter Gibbs of a TD Towers insurance agency), functioned as the 99 percent joint tenancy purchaser of Mr. Karat's real estate. The integration of public healthcare infrastructure and the head of the CAMH archives to conceal perpetrators of property theft underscores the depth of the coordinated civil malice.

23. The malicious genesis is further illuminated by the deeply concerning historical conduct of the primary civil instigators. The documentary record evinces a persistent, undeniable pattern of procedural abuse, exemplified by Mr. Andrew Papadimitropoulos's circuitous professional trajectory. Having struggled significantly with Law Society admission, he previously engaged in erratic behaviour, including loitering around the Minto Buildings courtyard. His verifiable deployment of uniquely identifiable phrasing such as "flouting with impunity" in an artificially generated letter purportedly from Alberta perfectly mirrors his mathematically and forensically confirmed forged signature of SNIC adjuster Alisha-Anne Nurse, a forgery that was brought to the explicit attention of the License Appeal Tribunal on September 19, 2024, precipitating the unlawful lockdown the very next day.

24. Such deceptive modalities are identically mirrored by Ms. Ashley Artopoulos's documented history of severe prevarication, including the transmission of an anonymous, completely fabricated sexual assault allegation directed against her own spouse within his corporate employment environment at Enbridge Inc. Furthermore, the orchestrating actors further engaged in highly coordinated subterfuge on November 9, 2024—booking a fabricated trip to the Aga Khan Museum—occurring exactly one day after the Attorney General of Canada was formally served with a Notice of Constitutional Question for the Human Rights Tribunal of Ontario on November 7, 2024.

25. The systemic operational culture surrounding this subversion is perhaps best summarized by the bizarre assertion made by a CAMH security guard on October 25, 2024, who stated that the undersigned "was going to learn that the lawyers in Ontario are a lot better than BC," an assertion that laughably attempts to frame a severe jurisdictional nullity as a provincial rivalry. The absolute failure of this application is self-evident; a tenant cannot be harassed or unlawfully seized of property by law enforcement operating without lawful authority, particularly when an adjudicative finding by Vice Chair Delorenzi of the LTB unequivocally affirmed the tenancy rights in question.

26. It is strongly submitted that elements of law enforcement, explicitly excluding the RCMP, will refuse to absorb institutional culpability for this orchestrated malicious prosecution. The profound irregularity of the Intake Court Endorsement is laid bare by its complete absence of any signature—handwritten, electronic, or digital. However, it is an established procedural reality that Chief Justice Morawetz (as he then was) regularly relied upon terse, handwritten notations upon the reverse side of originating documents, treating this profound liberty-depriving instrument with the relaxed administrative informality of a bankruptcy insolvency commencement. Criminal law does not operate upon such relaxed, extracurial standards.

PART VI: STATUTORY AGENTS, CRYPTOGRAPHIC FORGERY, AND THE SHIELDING OF THE CROWN

27. The legal counsel addressed herein are solemnly and formally reminded of their paramount professional, ethical, and fiduciary obligations as officers of the court. With the utmost respect for the administration of justice, the systemic subterfuge has been comprehensively exposed.

28. The statutory authority governing the orchestrated defense of this nullity is explicitly codified within the *Criminal Code*. Pursuant to paragraph 2(b)(ii), the "Attorney General" is definitively established as the Attorney General of Canada, inclusive of his or her lawful deputy, with respect to proceedings commenced at the instance of the Government of Canada and conducted by or on behalf of that Government. Furthermore, section 507 of the *Criminal Code* explicitly recognizes the "Attorney General's agent" as the lawful entity authorized to lay an information before a justice.

29. Consequently, Mr. Norris, Mr. Alviano, and Mr. Continelli functioned unequivocally as the statutory agents of the Attorney General of Canada. This agency was explicitly, forcefully asserted by Mr. Norris himself in the correspondence provided via Ms. Alaina Lam on June 3, 2026, wherein he formally demanded that the Applicant cease communications with Assistant Commissioner Matt Peggs, thereby directly interposing the Attorney General as the shielding apparatus for the Royal Canadian Mounted Police.

30. This deeply coordinated institutional defense explains the procedurally catastrophic *Privacy Act* response, wherein an absolute, deliberate failure to conduct a Level 3 offline mainframe search occurred strictly because Mr. Jeff Ball was engaged in extra-procedural communications with Mr. Norris, Mr. Alviano, and Mr. Continelli to coordinate a unified defense against the release of the raw hexadecimal ledger.

31. It must be stated with absolute precision and devoid of any ambiguity: the primary and sole motivation underpinning the structural anomalies, the digital falsifications, and the deployment of errant procedural language—albeit manifesting in a dictation purportedly issued to a neutral Judge of the Federal Court of Canada—was a desperate, unified imperative to avoid the production of the certified tribunal record (the "Certified Tribunal Record"). The statutory obligation to transmit this metadata under *Rule 317* and *Rule 318* had crystallized perfectly without objection, generating an unopposed procedural pathway for the extraction of the devastating Canadian Police Information Centre Metadata.

32. The entity responsible for the severe forensic negligence of leaving decipherable cryptographic metadata embedded within the Justice Whyte Nowak July 2 Purported Direction must recognize the catastrophic, mathematically verifiable nature of that algorithmic error. The extraction of the t-4313-25 direction.docx (the "T-4313-25 Direction Docx") internal identifier conclusively proves the document was cloned directly from Mr. Alviano's 2025 Tax Court archives.

33. Furthermore, the operational motive driving Ms. Maya Jo Blake Janierre to act as a clandestine transmission proxy for the fabricated July 2 Direction was an unvarnished demonstration of fealty and reciprocation. It is submitted that this act was a calculated payback designed to show absolute loyalty to the very executive branch apparatus that afforded her unprecedented impunity, transitioning her into a government cooperating witness following severe 2021 criminal indictments. It strains judicial credulity that, absent the leverage

derived from those specific criminal charges, she would subsequently secure illicit access to act as a valued administrative functionary within the precise union representing Mr. Ball and Mr. Curtis Mathews.

34. If any legal counsel addressed herein functioned as an architect, facilitator, or willful participant in the digital falsification of a judicial document, and the *ultra vires* substitution of the independent Federal Court of Canada Trial Division heraldic logo with the National Coat of Arms of Canada, such conduct is immediately suspendable and unequivocally disbarable; however, the formal adjudication of such severe professional misconduct shall be deferred to the Law Society of Ontario.

35. Notwithstanding the entirety of the aforementioned *ultra vires* machinations, the blatant jurisdictional evasions, the deployment of compromised proxy transmission nodes, and the sophisticated fabrication of digital templates, the Attorney General of Canada maintains a positive, continuous, and non-delegable legal obligation to cause the Requested Court Records to be provided forthwith.

PART VII: CONCLUSION AND ULTIMATE IMPERATIVES

36. In absolute summation, the non-negotiable, irrevocable temporal mandate for the immediate, unredacted production of the aforementioned Requested Court Records—strictly encompassing the Authentic Information Package, the underlying Criminal Code Form 2 Information, and all authentic Intake Court Endorsements—remains unequivocally fixed at noon tomorrow, July 20, 2026.

37. By providing the Requested Court Records by noon tomorrow, the Office of the Chief Justice of the Superior Court of Justice (Ontario) shall be promptly notified that the correct, verified Authentic Information Package has been successfully secured, explicitly highlighting the necessary inclusion of the instruments structurally routed through the originating court office responsible for bankruptcy, insolvency, or family law.

38. Failing absolute and strict compliance with this deadline, the full spectrum of appellate, supervisory, and disciplinary judicial remedies shall be relentlessly pursued. This pursuit will remain unyielding until this gross jurisdictional usurpation is comprehensively corrected, the rule of law is fully restored, and the systemic manipulation of the judicial record is entirely exposed before the appropriate, independent authorities.

39. The right is unequivocally reserved to rely upon this correspondence for any and all lawful purposes, strictly encompassing any present or future proceeding, and in support of any claim for costs, whether investigative, proceeding-based, or otherwise. Furthermore, the explicit right is reserved to supplement this demand in a more fulsome manifestation as additional evidentiary matrices become known. Finally, a cordial yet absolute reminder is formally issued to all addressed legal counsel regarding their paramount professional obligations. This explicitly encompasses the strict prohibition against assisting, advising, or facilitating any fraud, crime, or unlawful act on behalf of any organization or entity, alongside the immutable, overarching duties owed continuously as officers of the court.

40. I also reserve the right to rely on this letter to timestamp the same for fraud I have not discovered or known about for purposes of unwinding or unravelling anything that must be unravelled on account of a special cause of nullity (see: SCC in *Landreville* citing *Lazarus Estates Ltd.*). This will of course be relied on as a further evidence why I have not been able to receive a "fair hearing" in Toronto as a situs or locus in any court (provincial or federal).

41. I shall convert this letter into PDF, not in the manner in which some have done with GrapeCity and PDF Xchange (formerly Tracker Software Products Ltd.) (see: Appendix (nota bene: it now appears that language from a Tax Court of Canada decision/other disposition was utilized but the logo of the Federal Court of Appeal was utilized which is eerily similar to the discombobulate efforts in the False Information Package), sign it and send a copy as well for formality purposes.

Yours truly,

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

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

Email: mclean@searchandseizure.ca

Enclosures

APPENDIX #1: [HTTPS://WWW.PDF-XCHANGE.COM/COMPANY/ABOUT-PDF-XCHANGE-CO-AND-TRACKER-SOFTWARE.HTML](https://www.pdf-xchange.com/company/about-pdf-xchange-co-and-tracker-software.html)

(nota bene: The Honourable AGC will note in the metadata for the Purported Direction False Document ascribed to Justice Whyte Nowak that the version of PDF-Xchange Editor is that of 10.71.399 so whomever has the license to the same is the culprit(s) of that falsification).

Our business began in the UK in 1997 as 'Tracker Software Products Ltd' to develop document management and imaging-related software. These products included TIFF and PDF digital conversion utilities that enabled the conversion of many document formats to TIFF and PDF for subsequent archiving within document management products. These standalone conversion applications quickly proved their worth and we made the decision to concentrate on the development of these utilities for the end-user and third-party software developer markets.

During the intervening years we have become a global leader in the PDF software market. Our offices are located in Canada, the U.K., Bulgaria and **Ukraine**. Our corporate headquarters relocated to **Vancouver Island, British Columbia**, in 2008, where we remained until 2016 - at which time we incorporated PDF-XChange Co Ltd in the U.K. to tie together all of our interests worldwide. In the coming months it is our intention to rebrand all of our sales and marketing under this one common brand worldwide.

Our vision is to provide dynamic and powerful software for the creation, editing, manipulation and conversion of PDF documents, and our applications can convert a huge range of document formats to and from PDF. Our dedicated team of developers strive continually to improve the quality and functionality of our products. We aim to create applications that are flexible enough to meet the needs of all practitioners from novice users to professional document creators. Our software creates files that conform to the internationally-recognized ISO PDF standard, which means they are compatible with all major PDF document viewers/editors worldwide.

We welcome input from all clients and will gladly consider your suggestions for our software - we are an approachable and responsive company, and we welcome your insights into our processes of product development and improvement. Customer satisfaction is our number one priority, and new users are always pleasantly surprised with the speed and depth of our support services. We believe that great software should also be affordable, and this is reflected in our single-payment, lifetime-license model. We will continue to support the 'perpetual' license model - where users pay only once for our products and have the right to use them in perpetuity, even if they choose not to subscribe to our competitive annual maintenance offers for access to the latest releases of the products. Our support services are completely free of charge to all users - even those using the free versions of the products - as we believe they are a valuable source of feedback and quality control that benefits all of our clients.

We invite you to become a client and help us to continue to build the very best products and services available in the PDF software market today. So, if you are searching for dynamic and affordable software applications that create stunning documents and come with top-tier customer support - then look no further, as we believe PDF-XChange Co Ltd is everything you will ever need.

--

Best regards,

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

Email: mclean@searchandseizure.ca

Phone: 647.370.9354

Fax: upon request

NOTA BENE: This email is for dispute resolution and litigation purposes only. Without prejudice communication so denoted invokes settlement privilege.

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5 attachments

 **Information Package 4810 998 24 48129169-00 (4).pdf**
329K

 **ADULT-COMMON-INFORMATION-FORM-WITH-HIGHLIGHTED-CHANGES - LINCOLN COUNTY LAW ASSOCIATION.pdf**
215K

 **T-2448-26 Directions from Associate Judge Cotter (20-MAY-2026) (1).pdf**
160K

 **T-2448-26_24-JUN-2026.pdf**
207K

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

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

Mon, Jul 20, 2026 at 5:00 PM

To: mcu@justice.gc.ca, webadmin@justice.gc.ca, "jake.norris@justice.gc.ca" <jake.norris@justice.gc.ca>, "Continelli, Nick"

<nick.continelli@justice.gc.ca>, tyler.alviano@justice.gc.ca

Cc: "alaina.lam@justice.gc.ca" <alaina.lam@justice.gc.ca>

Reply to: Mr. Kevin A. McLean (BA, JD, CIM)

Reply via email: mclean@searchandseizure.ca

Date: July 20, 2026

Classification: Private and Confidential

Sending method: Via Email at first instance (other modes may follow)

To: The Attorney General of Canada, Mr. Norris, Mr. Alviano, and Mr. Continelli

Subject I: Demand for the Immediate Production of the Authentic Information Package and Associated Instruments

Subject II: Notice of Absolute Nullity Regarding Jurisdictional Overreach, Institutional Subterfuge, and the Breach of Fiduciary Duties

Dear Sirs, Mesdames, and Other Gender-Neutral Pronouns:

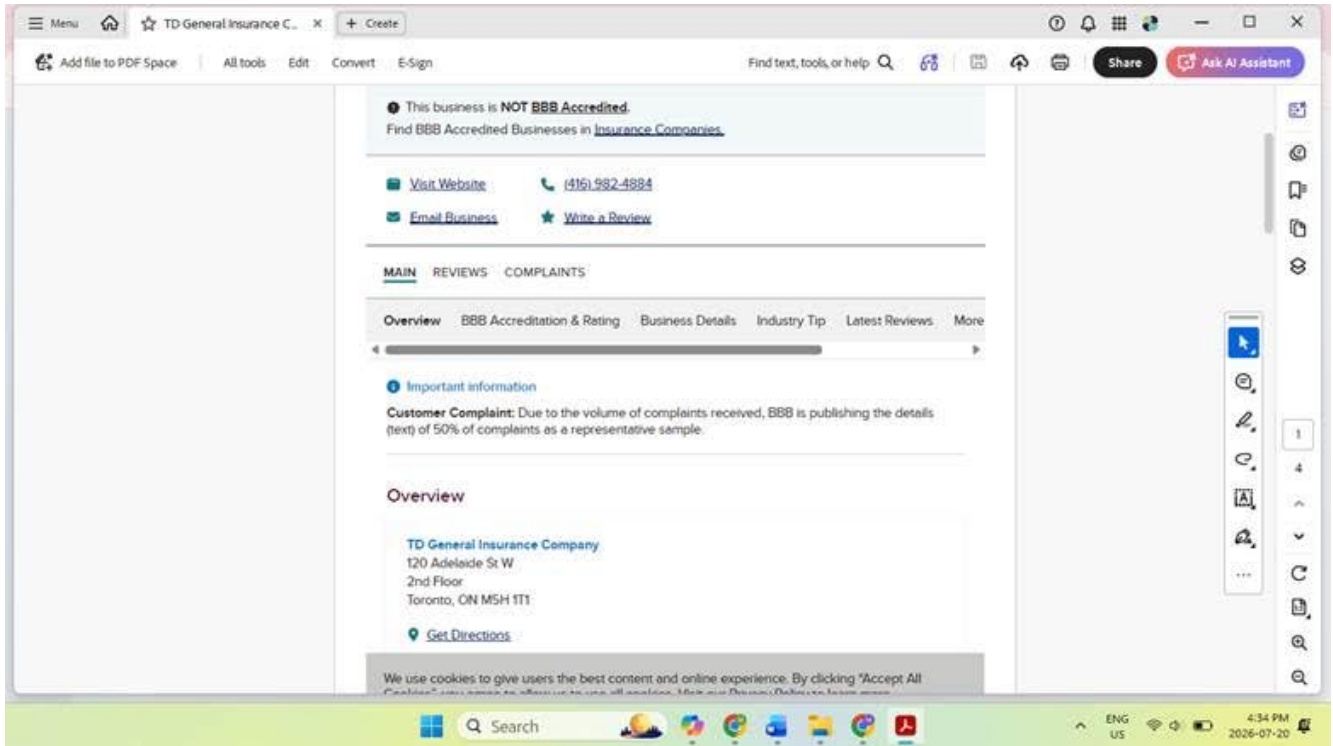
Part I: Introduction, Preliminary Context, and the Anatomy of Retaliatory Obfuscation

1. Correspondence is herein directed regarding the aforementioned subjects, necessitated by the discovery of incontrovertible documentary evidence that fundamentally alters the complexion of the ongoing administrative and quasi-criminal proceedings. It must be addressed *in limine* that previous submissions concerning the complete synthesis of this matter required a singular, yet profoundly consequential, factual addendum. The documentary *acta* had previously left obscured a critical, clandestine nexus between TD General Insurance Company (the "**TDGIC**")—bearing Financial Services Regulatory Authority of Ontario (the "**FSRA**") registration number 353—and federal law enforcement apparatuses. The revelation of this nexus shatters any presumption of administrative regularity, exposing a coordinated architecture of procedural malfeasance.
2. The evidentiary record now demonstrably establishes the indisputable inferences surrounding the highly irregular and legally compromised conduct of Mr. Papadimitropoulos. It is an incontrovertible extrapolation that upon the realization that the undated anniversary correspondence authored to Ms. Nicole Artopoulos prior to 2017 was inextricably linked to his penmanship on the fraudulent ontario claim for accident benefits number eighteen (the "**OCF-18**") in April 2023—wherein the signature “As per A. Nurse” was forged in an *ultra vires* and legally incompetent manner—a retaliatory campaign of false reporting and orchestrated complaints was subsequently executed. This was not a mere sequence of unfortunate administrative missteps, but rather a concerted endeavor to weaponize regulatory frameworks and law enforcement mechanisms to conceal the initial forgery and suppress lawfully mandated entitlements. The presence of *mens rea* in the orchestration of these complaints is manifest, transitioning the matter from civil irregularity to deliberate malfeasance.

Part II: The Factual Matrix, Corporate Subterfuge, and the Unveiling of the Locus

3. It has been recently ascertained, and is hereby irrevocably entered into the evidentiary record for subsequent provision to the Federal Court of Canada and concurrent administrative tribunals, that the administrative corporate profile address for TDGIC is situated on the second floor of 120 Adelaide Street

West, Toronto, Ontario. This revelation serves as the *sine qua non* for understanding the extra-judicial coordination that has plagued this file.



4. This specific locus is conspicuously identical to the premises occupied by the attorney general of Canada (the "**Attorney General of Canada**"), specifically encompassing the offices of Messrs. Norris, Continelli, and Alviano. The documented utilization of TDGIC within the administrative framework was not merely an administrative irregularity or a clerical misnomer; it was a deliberate structural manipulation bearing the most severe legal implications. The geographical congruence of these entities at a centralized, non-public facility inherently degrades the prophylactic barriers legally and ethically required between prosecutorial authorities and private corporate actors, facilitating an environment ripe for unrecorded, *ex parte* communications and the improper sharing of privileged data.
5. The sustained adversarial efforts exerted to achieve the removal of TDGIC in June 2024 were necessitated by the paramount imperative to restore the sole authorized underwriter present within the documentary record from August 31, 2022, until the initiation of the statutory application under the *Insurance Act*. This improper designation persisted relentlessly until the intervention of Ms. Lindsay Lake, an adjudicator compromised by recognized and documented conflicts of interest, who actively re-inserted said entity into the proceedings. This intervention occurred despite TDGIC's conspicuous absence from the originating statutory Licence Appeal Tribunal (the "**LAT**") application and the initial interlocutory motions. The

actions of Adjudicator Lake transgressed the foundational principles of natural justice, specifically the doctrine of *nemo judex in causa sua*. Consequently, any decision rendered under such incurably conflicted parameters constitutes a fundamental nullity, devoid of jurisdictional competence, and is entirely *void ab initio*.

Part III: Statutory Hierarchy, Legislative Intent, and the Nullification of Improper Designations

6. The absolute necessity of delineating the distinct corporate entities is predicated upon fundamental principles of contract law, privity, and strict statutory interpretation. TD Home & Auto Insurance (the "TDHA") was, and perpetually remains, the true and solitary first insurer pursuant to *Regulation 283*, as unequivocally confirmed by the perfected OCF-1 transmission to the sole designated facsimile number: 416-774-3120. This communication vector belongs exclusively and uniquely to TDHA. The LAT's June 20, 2024 decision properly, albeit belatedly, restored the statutory hierarchy by recognizing Security National Insurance Company (the "SNIC") as the authentic underwriter.
7. The legislative intent animating *Regulation 283* is strictly calibrated to ensure the rapid, unimpeded provision of statutory accident benefits, expressly prohibiting the delayed adjudication of claims while insurers dispute priority. TDHA possessed the exclusive lawful first-loss responsibility under the *Statutory Accident Benefits Schedule*, while SNIC remained the sole insurer delineated upon the executed policy instruments. TDGIC, conversely, functioned neither as the first insurer nor as the underwriter; it was a total stranger to the contract. Its phantom appearance within the administrative record was an absolute nullity, generated through calculated misidentification rather than genuine error. The LAT's formalized correction of this misidentification is binding, unappealed, constitutes *res judicata* on the issue of corporate identity, and forms the unshakeable structural foundation upon which all subsequent statutory obligations must be strictly assessed.
8. This deliberate misrouting of the claim to SNIC and the fictitious respondent TDGIC created a devastating, cascading administrative failure. This failure functioned precisely as intended: to unlawfully deprive the insured of mandated statutory entitlements, to systematically obstruct the processing of the auto insurance standard invoice (the "OCF-21"), and to entrench an insurer sequence that was legally impossible and strictly prohibited under *Regulation 283*. The evidentiary record unequivocally demonstrates that TDGIC maintained no lawful participatory role, possessed no consumer-facing operations whatsoever, and held zero statutory authority to operate as the first insurer. Its insertion resulted in the OCF-21 being transmitted into an administrative void, received by entities fundamentally incapable

of, or deliberately opposed to, locating the claim. The formal restoration of TDHA as the first insurer is *ipso facto* essential to rescuing the integrity of the statutory scheme from profound corruption.

Part IV: Jurisprudential Application: Fiduciary Duty, Good Faith, and Institutional Malfeasance

9. The profound legal magnitude of distinguishing these corporate entities is crystallized through an exhaustive analysis of the overarching jurisprudence governing the insurance sector and the sanctity of contract:

10. *Bhasin v. Hrynew*, 2014 SCC 71 (the "*Bhasin Decision*").

- **Summary of Jurisprudence:** The Supreme Court of Canada established a paramount, organizing principle of good faith governing all commercial contracts, mandating a strict duty of honest performance. This principle precludes parties from actively deceiving or misleading each other respecting the performance of the contract.
- **Application to the Facts:** When interpreted in conjunction with the *Insurance Act* and the statutory deeming provisions establishing privity, an insured person is deemed a primary party to the contract upon the determination of insured status. Consequently, SNIC owed an uncompromising, reciprocal, and continuous duty of good faith. The active concealment of the true responding party, and the utilization of a corporate facade (TDGIC), constitutes an egregious deviation from this duty, rendering the resulting administrative proceedings a substantive nullity rooted in *mala fides*.

11. *Beasley et al v. Barrand*, 2010 ONSC 2095 (the "*Beasley Decision*").

- **Summary of Jurisprudence:** The Ontario Superior Court of Justice, per the Honourable Justice Moore, articulated at paragraph 34 that the obligations incumbent upon a first-party insurer transcend the standard commercial baseline of good faith, ascending unequivocally to the absolute zenith of a fiduciary duty. This requires the insurer to prioritize the insured's interests and act with the utmost loyalty and transparency.
- **Application to the Facts:** As the undisputed first insurer, TDHA was inherently bound by this stringent fiduciary duty. The zealous, unrelenting machinations by opposing counsel and the alternative dispute resolution specialist to artificially retain the non-entity TDGIC as the sole respondent within the LAT proceeding functioned specifically to circumvent, frustrate, and sever this fiduciary obligation. By substituting a fiduciary (TDHA) with a corporate stranger (TDGIC), the institutional apparatus sought to absolve itself of equitable liability.

Part V: Breach of Confidence, the Tort of Intrusion, and the Misuse of Privileged Information

12. The precipitous, highly irregular rendering of a decision concerning Notice of Motion #7 by Adjudicator Lake—addressing the unauthorized and *ultra vires* dissemination of highly sensitive personal information (the "**Personal Information**")—further exemplifies the structural procedural unfairness and the complicity of the tribunal. Those institutional actors who have received, synthesized, and utilized the Personal Information as a direct consequence of the underlying breach of fiduciary duty are inextricably captured by the following jurisprudential continuum:

- *Jones v. Tsige*, 2012 ONCA 32 (the "*Jones Decision*").
- *Dervisholli et al. v. Cervenak and State Farm*, 2015 ONSC 2286 (the "*Dervisholli Decision*").
- *David v TransAmerica*, 2016 ONSC 1777 at paragraphs 54 to 57 (the "*David Decision*").
- *Raffaella de Rosa v. Wawanesa Mutual Insurance Company*, 2017 ONFSCDRS 161 (the "*De Rosa Decision*").

13. **Summary of Jurisprudence:** The aforementioned array of case law definitively solidifies the tort of intrusion upon seclusion, imposing strict equitable and tortious liability upon corporate and state entities that misappropriate, access, or improperly disseminate highly confidential personal and medical data. This liability is magnified exponentially when such transmission arises as the poisoned fruit of a primary fiduciary breach.

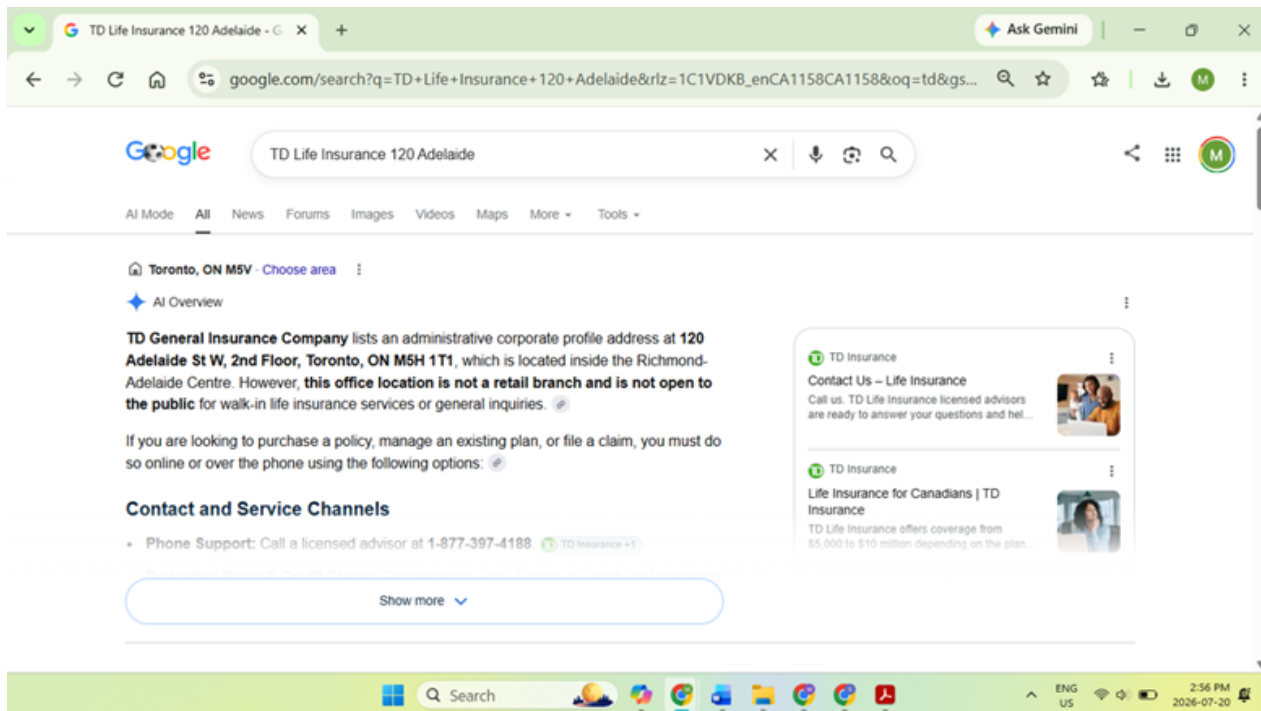
14. **Application to the Facts:** The systemic architecture of this scheme involved establishing TDHA as the primary fiduciary within Ontario, while simultaneously and improperly routing the statutorily protected Personal Information through the unencumbered conduit of TDGIC. This conduit was subsequently utilized to orchestrate an unlawful incarceration via the Toronto Police Service 14th Division, absent any lawful warrant or judicial oversight. This bypass was executed with surgical precision because TDGIC owed no contractual duty of good faith, bore no fiduciary obligations, and had never received the requisite dispute notices from TDHA. It was utilized entirely as an equitable shield to facilitate state overreach.

15. Furthermore, the actions of the Royal Canadian Mounted Police (the "**RCMP**"), the Attorney General of Canada, and all ancillary prosecutorial parties are strictly governed by the uncompromising equitable principles of breach of confidence, as comprehensively synthesized by Madam Justice Griffin in *No Limits Sportswear Inc. v. 0912139 B.C. Ltd.*, 2015 BCSC 1698 (the "*No Limits Decision*").

16. **Summary of Jurisprudence (*No Limits Decision*):** Relying upon foundational Supreme Court of Canada precedents (*Lac Minerals Ltd. v. International Corona Resources Ltd.*, 1989 CanLII 34 (SCC) and *Cadbury Schweppes Inc. v. FBI Foods Ltd.*, 1999 CanLII 705 (SCC)), the Court affirmed that a breach of confidence necessitates three elements: the information must possess a quality of confidence; it must have

been imparted under circumstances obligating confidentiality; and the defendant must have engaged in the unauthorized use of the information. Crucially, equity pursues this confidential information into the hands of third parties who receive it with actual or constructive knowledge of the breach. It strictly prohibits the utilization of such data as a "springboard" or "head start" to the detriment of the confider, demanding remedies designed to restore the *status quo ante*.

17. **Application to the Facts:** The resultant detriment is categorically manifest and irreparably damaging. It is predicated upon the demonstrable, newly uncovered fact that TDGIC maintained an unpublicized, integrated office space on the second floor at 120 Adelaide Street West. The complete absence of public accessibility at this location facilitates an opaque environment highly conducive to surreptitious communications, the unmonitored transfer of medical dossiers, and collusion between agents of the Attorney General of Canada and TDGIC. The utilization of the Personal Information as a prosecutorial "springboard" clearly violates the doctrine established in *Lac Minerals*.



18. The insertion of TDGIC into the procedural matrix was not an administrative happenstance; rather, it was a deliberate contrivance engineered to obfuscate and sanitize the *ultra vires* machinations orchestrated far beyond public purview. The prospective adjudication of these matters under the *Personal Information Protection and Electronic Documents Act* within the auspices of the Federal Court of Canada shall assuredly expose the staggering magnitude of these transgressions, penetrating the corporate veil to reveal the underlying coordinated malfeasance.

19. In the demonstrable absence of a contractual nexus—thereby vitiating the foundational requisite for the doctrine of good faith—and the consequential nullification of any First Insurer designation regarding TDGIC—thereby extinguishing all fiduciary obligations—the resultant legal paradigm restricts liability strictly to tortious domains and *sui generis* equitable obligations concerning the breach of confidence by unauthorized recipients. While the jurisprudential and logical coherence of the submissions proffered by Mr. Papadimitropoulos, Mr. Karat, and Mr. Nieuwland—specifically the spurious, *ultra vires* proposition that TDGIC and SNIC operated as a singular, indistinguishable entity, a submission received with documented incredulity by the FSRA—remains a matter for prospective adjudication, such analytical deficiencies must not be permitted to obscure the immediate exigencies of this matter. Consequently, to preclude any procedural ambiguity or cross-purposes, the uncompromising obligation incumbent upon the institutional respondents to file the requisite Certified Tribunal Record (the "CTR") and to effectuate the immediate production of the demanded instruments remains absolute and non-derogable.

Part VI: Demands, Consequences of Non-Compliance, and Conclusion

20. The preceding exhaustive analysis meticulously elucidates the illegitimate rationale underlying the ongoing, bad-faith suppression of the authentic information package (the "**Authentic Information Package**"), the *Criminal Code* Form 2 Information (the "**Criminal Code Form 2 Information**"), and all associated endorsements and appendices. It is an inescapable legal reality that the mandated disclosure of these instruments will invariably evidence the profound impropriety, lack of factual foundation, and absolute nullity of the charges laid. Said charges have been *void ab initio* since at least November 2024, manufactured upon a foundation of misappropriated data and jurisdictional overreach.
21. It must be stated with absolute finality: anticipated institutional prejudice, the prospective exposure of administrative and prosecutorial malfeasance, or the desire to shield state actors from civil liability does not, and legally cannot, constitute a justifiable defense for the spoliation of evidence or the continued non-compliance with fundamental statutory and constitutional mandates. The principles of disclosure are paramount and non-derogable.
22. Irrespective of the extensive legal extrapolations and incontrovertible factual nexus delineated above, the formal demand for the immediate, unredacted production of the aforementioned documents remains outstanding. Immediate and complete compliance is formally required. A finalized, perfected copy of this correspondence shall be transmitted via facsimile to the highest offices of the Attorney General of Canada to ensure the requisite level of gravity is appropriately internalized, documented, and immediately

actioned. Continued suppression will result in the immediate pursuit of prerogative writs to compel performance and sanction institutional intransigence.

23. I confirm that there has not been any denial or objection to the facts above in my letter/email of this morning and as expected.

24. The right is unequivocally reserved to rely upon this instrument for all lawful purposes. This correspondence shall be introduced into the evidentiary record for the hearing scheduled for Wednesday, to elucidate the exigent nature of these proceedings and to confirm to the concurrent judicial bodies why the jurisdiction of Toronto currently presents an absolute impossibility for the obtainment of a fair and impartial adjudication.

Yours truly,

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

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

Email: mclean@searchandseizure.ca

On Mon, Jul 20, 2026 at 12:28 AM Mr. Kevin Alexander McLean <mclean@searchandseizure.ca> wrote:

Reply to: Mr. Kevin A. McLean (BA, JD, CIM)

Reply via email: mclean@searchandseizure.ca

Date: July 19, 2026

Classification: Private and Confidential

Sending method: Via Email at first instance (other modes may follow)

TO:

Attorney General of Canada (The Honourable Mr. Sean Fraser)

Department of Justice Canada

284 Wellington Street

Ottawa, Ontario, K1A 0H8

Minister/Attorney General Office Email: mcu@justice.gc.ca

General Department Email: webadmin@justice.gc.ca

Office Fax: 1-613-957-3559

Mr. Jacob Norris

Email: jake.norris@justice.gc.ca

Department of Justice Canada, Ontario Regional Office

120 Adelaide Street West, Suite 400

Toronto, Ontario

Mr. Nick Continelli

Email: nick.continelli@justice.gc.ca

Department of Justice Canada, Ontario Regional Office

120 Adelaide Street West, Suite 400

Toronto, Ontario

Mr. Tyler Alviano

Email: tyler.alviano@justice.gc.ca

Department of Justice Canada, Ontario Regional Office

120 Adelaide Street West, Suite 400

Toronto, Ontario

Copied to: Ms. Alaina Lam

SUBJECT I: FORMAL DEMAND FOR THE PRODUCTION OF AUTHENTIC COURT DOCUMENTS (AVAILABLE TO THE PUBLIC AT LARGE) AND THE IMMEDIATE CESSATION OF ULTRA VIRES MACHINATIONS

SUBJECT II: NOTIFICATION OF IMMINENT ESCALATION TO THE CHIEF JUSTICE OF THE SUPERIOR COURT OF JUSTICE AND OTHER AUTHORITIES/BODIES SHOULD THEY NOT BE DISCLOSED ON OR BEFORE NOON TOMORROW

Dear Sirs/Mesdames/Other Gender-Neutral Pronouns:

PART I: PRIMARY DEMAND, INTRODUCTION, AND THE VITIATION OF JURISDICTION

1. Take explicit and irrevocable notice: It is strictly demanded that the addressed entities produce, or cause to be produced forthwith, the requested court records (the "Requested Court Records"), specifically encompassing the authentic information package (the "Authentic Information Package"), strictly inclusive of the unadulterated criminal code form 2 information (the "Criminal Code Form 2 Information") and/or the criminal code form 4 indictment (the "Criminal Code Form 4 Indictment"), alongside any and all true originating intake court endorsements (the "Intake Court Endorsements"), by no later than noon tomorrow, July 20, 2026.

2. Correspondence is hereby initiated regarding the aforementioned subjects. A formal, irrevocable, and coercive demand is articulated herein for the immediate production of highly specific, unadulterated evidentiary and requested court records. The deliberate deprivation of these foundational materials constitutes an absolute nullity, operating as a direct abrogation of the core tenets of Canadian jurisprudence and effectuating a profound usurpation of the rule of law. It is submitted that the absolute integrity of the judicial record remains the paramount bedrock of the administration of justice, serving as the singular bulwark against the arbitrary exercise of state power and the clandestine weaponization of the judicial apparatus.

3. The overarching equitable and common law maxim of *fraus omnia corrumpit* dictates that any subsequent proceedings, procedural maneuvers, or deprivations of liberty predicated

upon a mathematically and forensically verifiable *fraud upon the court* are rendered irrevocably *void ab initio*. Such systemic subversions cannot be cured by subsequent administrative acquiescence; rather, they operate to vitiate the foundational jurisdiction of the tribunal entirely.

4. The agents of the Attorney General of Canada are strictly bound by an elevated fiduciary, ethical, and constitutional duty to the administration of justice, functioning as the indispensable gatekeepers of prosecutorial fairness. When the coercive powers of the state are mobilized based upon manufactured instruments that deliberately bypass mandatory statutory gateways, the resulting deprivation of liberty transcends a mere procedural irregularity and crystallizes into a profound jurisdictional nullity that demands immediate remedial intervention.

5. Furthermore, it is unequivocally asserted that the Attorney General of Canada, functioning strictly as an apparatus of the federal executive branch, is absolutely precluded from attempting to usurp the inherent duties, powers, and exclusive jurisdiction of a Superior Court—a constitutionally protected "Section 96 Court" under the *Constitution Act, 1867*. Any calculated endeavor by executive agents to induce breaches of the aforementioned judicial duties and powers operates as a constitutional nullity of the highest order, striking at the very independence of the judiciary. This strict preclusion extends absolutely to the inducement, facilitation, or orchestration of any breaches of the *Administration of Justice Act* and the attendant regulation(s) promulgated thereunder. The systemic and administrative sanctity of the judicial apparatus must remain inviolate against executive overreach.

PART II: THE IMPERATIVE DEMAND FOR PRODUCTION, FORENSIC DISCLOSURE, AND SYSTEMIC TRANSPARENCY

6. It is strictly demanded that the addressed entities produce, or cause to be produced (whether through direction, instruction, advice, or counsel), any of the individuals who maintain a form of possession, constructive possession, or systemic control over the following Requested Court Records, acknowledging the specific distinction between requested court records and authentic judicial documents as codified within the Auditor General of Ontario reports in 2019:

- a. The Authentic Information Package, strictly devoid of the structural, visual, and cryptographic metadata anomalies introduced via third-party digital manipulation, unauthorized algorithmic flattening, and deliberate vector compression executed outside the secure, electronically monitored parameters of the Courts Administration Service intranet;
- b. The Criminal Code Form 2 Information and/or the Criminal Code Form 4 Indictment originating from 2024, presumably instantiated within the temporal parameters of August to October 2024. These represent the exclusive, true statutory instruments required to lawfully initiate a criminal proceeding under the *Criminal Code*, necessitating an oath sworn before a recognized, legally appointed jurist operating within the appropriate territorial and subject-matter jurisdiction, completely severed from the irregular triage mechanisms subsequently employed;
- c. Any orders, decisions, or other dispositions made, given, issued, or otherwise endorsed that stand in direct contradistinction to the intake court endorsement (the "Intake Court Endorsement") dated September 23, 2024. It is formally noted that such an endorsement is structurally incompatible with the *Criminal Proceedings Rules* of the Ontario Court of Justice and operates as an absolute nullity within the context of a federal policing action;
- d. The nominal identification of the legal counsel who acted as the active agent, architect, or facilitator on behalf of the "law enforcement applicant" operating under the statutory mantle of the Attorney General of Canada, thereby invoking the definitions and statutory obligations enshrined within the *Director of Public Prosecutions Act*;
- e. Exhaustive particulars, inclusive of, but not limited to, the precise dates, temporal timestamps, and security access logs of their attendance before a Judge of the Superior Court of Justice. This demand is formulated while explicitly appreciating the distinct

improbability that any legitimate attendances transpired within the standard Criminal E-Intake Portal before an Ontario Court of Justice Judge or a Justice of the Peace. Furthermore, it is acknowledged that Justice of the Peace Mr. Jiri maintained absolutely no involvement at the relevant temporal juncture, yet may have subsequently acquiesced to his nomenclature being fraudulently utilized as the fictitious judicial officer to artificially sanitize an extrajudicial jurisdictional nullity;

f. The explicit identification of the individuals who physically or remotely attended in chambers, a severe procedural circumvention that bypassed the public docket entirely and was subsequently admitted and affirmatively represented by Ms. Nivatha Amirthalingam of the Superior Court of Justice Regional Manager's Office. This explicitly includes the required identification of any municipal decoy informants;

g. The nominal identification of the true affiant and informant, presuming it remains unequivocally established within the unredacted historical metadata as regional commander mr. matt peggs (the "Regional Commander Mr. Matt Peggs") of the Royal Canadian Mounted Police, acting in his official capacity as the commanding officer of the Central Region, who purportedly executed a remote declaration at approximately 11:43 a.m. on September 23, 2024;

h. The nominal identification of the jurist giving, issuing, endorsing, or making the order or the aforementioned Intake Court Endorsement, acknowledging that such terse, handwritten endorsements operate structurally as a creature of commercial insolvency, bankruptcy, or family law triage rather than standardized, publicly docketed criminal procedure, and acknowledging the explicit, *in camera* involvement of Chief Justice Geoffrey B. Morawetz (as he then was);

i. Any and all typologies of warrants made, given, issued, or otherwise endorsed in either oral or documentary manifestations, inclusive of all granular particulars. This strictly requires the unredacted production of the Canadian police information centre metadata (the "Canadian Police Information Centre Metadata"), specifically encompassing the raw hexadecimal ledger dumps, Originating Agency Identifiers, System Identification Numbers, and all recorded ADD, MODIFY, CLEAR, and CANCEL transactions within the offline historical database pertaining to the police case id 457197 (the "Police Case ID 457197").

PART III: TIMELINE, APPELLATE MECHANISMS, AND IRREVOCABLE CONSEQUENCES

7. The inflexible temporal mandate for the fulfillment of these strict evidentiary obligations is established precisely at noon tomorrow, July 20, 2026. Failing absolute and strict compliance with this deadline, aggressive, relentless, and active measures shall be undertaken to draw this profound jurisdictional usurpation to the immediate, undivided attention of the Chief Justice of the Superior Court of Justice, Chief Justice Boucher.

8. This escalation shall be executed in tandem with concurrent, formalized notifications to the administrative registries and commanding jurists of the Federal Court of Canada, the Federal Court of Appeal, and the Tax Court of Canada, explicitly acknowledging the highly irregular, cross-departmental intermingling of the latter's digital administrative templates within this specialized, unrelated proceeding.

9. A formal, exhaustive complaint has previously been transmitted to the Canadian Judicial Council. This transmission was predicated upon the foundational, immutable maxim that it remains the non-delegable, positive responsibility of the presiding judge to ensure that any instrument issued in their nomenclature reflects strict factual actuality and adheres rigorously to established rules of practice. It must be emphasized with absolute clarity that Justice Whyte Nowak was not lawfully "presiding" over this matter, as she possessed no lawful assignment to the docket, nor did the capacity to self-assign exist under the framework of the *Federal Courts Rules*.

10. Irrespective of the voluminous quantum of forgery, falsification, fabrication, distortion, alteration, and/or deception that demonstrably transpired—as witnessed with the structural

manipulation of the Authentic Information Package and the subsequent generation of the justice whyte nowak july 2 purported direction (the "Justice Whyte Nowak July 2 Purported Direction"), which exists as a legally indisputable false document—such machinations undertaken by extrinsic actors mandate severe judicial scrutiny. A legitimate Judge of the Federal Court of Canada must explicitly authorize a document's dissemination, irrespective of the physical lack of a signature.

11. Further supplementary complaints targeting the systemic deprivation of procedural fairness, the blatant abuse of process, the misapplication of administrative law principles, and the incontrovertible orchestration of a fraud upon the tribunal are being drafted concurrently with this correspondence. Consequently, the trajectory, velocity, and ultimate severity of these subsequent filings will remain entirely contingent upon the substantive nature of the response remitted herein.

12. The explicit attention of the Chief Justice shall be forcefully directed toward the binding, paramount appellate jurisprudence of *Ontario (Criminal Code Review Board) v. Hale* and *Canada Post Corp. v. Canada (Minister of Public Works)*. These binding precedents irrevocably reinforce the foundational principle that the Superior Court of Justice maintains inherent jurisdiction and absolute, constructive control over Requested Court Records and their underlying systemic metadata in the event of deliberate alteration, spoliation, or purportedly anomalous technological glitches.

13. Should you disagree with any of the averments, evidentiary conclusions, cryptographic metadata deductions, visual heraldry analyses, or factual assertions delineated within this correspondence, an open, formal invitation is hereby extended to the addressed legal counsel to correct the record, as these proceedings cannot be conducted in the dark. Desperate times have evidently necessitated desperate, *ultra vires* measures.

PART IV: FACTUAL MATRICES, CIVIL GENESIS, JURISDICTIONAL SHOPPING, AND THE DEPRIVATION OF JURISDICTION

14. A meticulous, granular deconstruction of the labyrinthine web of institutional actors and the intricate architecture of complicity defining this proceeding has been executed. The transition from a dismissed municipal police call anchored in a localized civil disagreement to a weaponized federal enforcement action required a profound circumvention of established criminal procedure. This extra-procedural trajectory resulted in the generation of an instrument that is, as a matter of strict constitutional and administrative law, absolutely *coram non judice*.

15. It is self-evident, based upon the chronological sequencing of events, that no legitimate municipal law enforcement entity maintained the conviction that any of the preceding charges possessed substantive merit. Indeed, they were completely *void ab initio* at the precise chronological moment the Authentic Information Package was digitally and fraudulently falsified into the subsequent deceptive iteration, rendering the subsequent deprivation of liberty a profound violation of fundamental *Charter* protections against arbitrary detention and malicious prosecution.

16. The genesis of this jurisdictional anomaly was anchored deeply in a protracted, localized, and highly personal civil dispute characterized by pronounced familial animus. The campaign to forcefully effectuate an eviction culminated in desperate, *ex parte* motions brought before the Landlord and Tenant Board on August 20, 2024, which were summarily and unequivocally denied by the adjudicator due to an absolute deficiency of evidentiary merit.

17. Following the catastrophic failure to weaponize civil tribunal mechanisms, municipal law enforcement was summoned on September 15, 2024. Detective Constable Eric Tang (Badge #10942) of the Toronto Police Service (TPS) 14th Division appropriately assessed the localized dispute as entirely civil in nature and declined to initiate any criminal proceedings whatsoever. This initial municipal refusal to criminalize a tenancy conflict was subsequently reinforced by representations made directly by TPS Officer Javier Solermo on September 21, 2024, who explicitly confirmed that the TPS did not involve itself in the unlawful lockouts

(pertaining to both the residential FOB and the physical apartment door) executed the preceding day.

18. Confronted with the absolute, principled refusal of the TPS 14th Division, the orchestrating actors engaged in an orchestrated, desperate campaign of multi-jurisdictional forum shopping. The Ontario Provincial Police (OPP) similarly assessed the matter and refused to intervene, a stance explicitly confirmed by the OPP's documented denial of any association with the Police Case ID 457197.

19. The desperate escalation manifested as a highly coordinated effort to bypass municipal and provincial safeguards to manufacture an extracurial deprivation of liberty by invoking the coercive apparatus of the federal state. When analyzing the language deliberately injected into Ms. Aphrodite Artopoulos's requests for expedited tribunal hearings—specifically asserting fabricated allegations of "drugs and theft"—it becomes evident this was a calculated maneuver designed to fit squarely within the specialized, statutorily defined mandate of the Royal Canadian Mounted Police (RCMP) Central Region, specifically the Toronto West Detachment (Milton Detachment) located at 2755 Highpoint Drive.

20. The Milton Detachment maintains exclusive responsibility for the enforcement of federal statutes in the downtown Toronto core and the western region of the Greater Toronto Area, operating heavily within the Criminal Intelligence Branch, Financial Crime, and Serious & Organized Crime frameworks. The invocation of narcotics was the artificial key utilized to unlock federal jurisdiction over a residential lease dispute. This jurisdictional nexus definitively explains the fictitious utilization of Justice of the Peace Mr. Jiri, as Brampton (Halton Region) maintained no lawful territorial jurisdiction whatsoever over the matter. The post-hoc deployment of a "No Fixed Address" (NFA) designation, despite the state possessing valid provincial driving credentials establishing residency, was an artificial construct designed strictly to furnish colour of right to a fundamentally nefarious deployment.

PART V: UNREDACTED METADATA, INSTITUTIONAL COMPLICITY, AND THE ANATOMY OF THE SUBVERSION

21. The vacuity of the fabricated law enforcement application was laid bare upon the un-redaction of the Centre for Addiction and Mental Health (CAMH) photographic evidence on May 4, 2025. This critical un-redaction definitively established that Mr. David Karat—having traveled from outside municipal boundaries (Oshawa or Markham) specifically to participate in the aforementioned theft of personal property on October 25, 2024—was physically hiding within the secured, highly restricted, and locked confines of the CAMH TIDES classroom.

22. This highly irregular access was facilitated by an incontrovertible conflict of interest involving Ms. Dorothy During-Gibbs, a CAMH social worker whose husband, Mr. Michael Gibbs (son of Peter Gibbs of a TD Towers insurance agency), functioned as the 99 percent joint tenancy purchaser of Mr. Karat's real estate. The integration of public healthcare infrastructure and the head of the CAMH archives to conceal perpetrators of property theft underscores the depth of the coordinated civil malice.

23. The malicious genesis is further illuminated by the deeply concerning historical conduct of the primary civil instigators. The documentary record evinces a persistent, undeniable pattern of procedural abuse, exemplified by Mr. Andrew Papadimitropoulos's circuitous professional trajectory. Having struggled significantly with Law Society admission, he previously engaged in erratic behaviour, including loitering around the Minto Buildings courtyard. His verifiable deployment of uniquely identifiable phrasing such as "flouting with impunity" in an artificially generated letter purportedly from Alberta perfectly mirrors his mathematically and forensically confirmed forged signature of SNIC adjuster Alisha-Anne Nurse, a forgery that was brought to the explicit attention of the License Appeal Tribunal on September 19, 2024, precipitating the unlawful lockout the very next day.

24. Such deceptive modalities are identically mirrored by Ms. Ashley Artopoulos's documented history of severe prevarication, including the transmission of an anonymous, completely fabricated sexual assault allegation directed against her own spouse within his corporate employment environment at Enbridge Inc. Furthermore, the orchestrating actors further engaged in highly coordinated subterfuge on November 9, 2024—booking a fabricated trip to the Aga Khan Museum—occurring exactly one day after the Attorney General of Canada was formally served with a Notice of Constitutional Question for the Human Rights Tribunal of Ontario on November 7, 2024.

25. The systemic operational culture surrounding this subversion is perhaps best summarized by the bizarre assertion made by a CAMH security guard on October 25, 2024, who stated that the undersigned "was going to learn that the lawyers in Ontario are a lot better than BC," an assertion that laughably attempts to frame a severe jurisdictional nullity as a provincial rivalry. The absolute failure of this application is self-evident; a tenant cannot be harassed or unlawfully seized of property by law enforcement operating without lawful authority, particularly when an adjudicative finding by Vice Chair Delorenzi of the LTB unequivocally affirmed the tenancy rights in question.

26. It is strongly submitted that elements of law enforcement, explicitly excluding the RCMP, will refuse to absorb institutional culpability for this orchestrated malicious prosecution. The profound irregularity of the Intake Court Endorsement is laid bare by its complete absence of any signature—handwritten, electronic, or digital. However, it is an established procedural reality that Chief Justice Morawetz (as he then was) regularly relied upon terse, handwritten notations upon the reverse side of originating documents, treating this profound liberty-depriving instrument with the relaxed administrative informality of a bankruptcy insolvency commencement. Criminal law does not operate upon such relaxed, extracurial standards.

PART VI: STATUTORY AGENTS, CRYPTOGRAPHIC FORGERY, AND THE SHIELDING OF THE CROWN

27. The legal counsel addressed herein are solemnly and formally reminded of their paramount professional, ethical, and fiduciary obligations as officers of the court. With the utmost respect for the administration of justice, the systemic subterfuge has been comprehensively exposed.

28. The statutory authority governing the orchestrated defense of this nullity is explicitly codified within the *Criminal Code*. Pursuant to paragraph 2(b)(ii), the "Attorney General" is definitively established as the Attorney General of Canada, inclusive of his or her lawful deputy, with respect to proceedings commenced at the instance of the Government of Canada and conducted by or on behalf of that Government. Furthermore, section 507 of the *Criminal Code* explicitly recognizes the "Attorney General's agent" as the lawful entity authorized to lay an information before a justice.

29. Consequently, Mr. Norris, Mr. Alviano, and Mr. Continelli functioned unequivocally as the statutory agents of the Attorney General of Canada. This agency was explicitly, forcefully asserted by Mr. Norris himself in the correspondence provided via Ms. Alaina Lam on June 3, 2026, wherein he formally demanded that the Applicant cease communications with Assistant Commissioner Matt Peggs, thereby directly interposing the Attorney General as the shielding apparatus for the Royal Canadian Mounted Police.

30. This deeply coordinated institutional defense explains the procedurally catastrophic *Privacy Act* response, wherein an absolute, deliberate failure to conduct a Level 3 offline mainframe search occurred strictly because Mr. Jeff Ball was engaged in extra-procedural communications with Mr. Norris, Mr. Alviano, and Mr. Continelli to coordinate a unified defense against the release of the raw hexadecimal ledger.

31. It must be stated with absolute precision and devoid of any ambiguity: the primary and sole motivation underpinning the structural anomalies, the digital falsifications, and the deployment of errant procedural language—albeit manifesting in a dictation purportedly

issued to a neutral Judge of the Federal Court of Canada—was a desperate, unified imperative to avoid the production of the certified tribunal record (the "Certified Tribunal Record"). The statutory obligation to transmit this metadata under *Rule 317* and *Rule 318* had crystallized perfectly without objection, generating an unopposed procedural pathway for the extraction of the devastating Canadian Police Information Centre Metadata.

32. The entity responsible for the severe forensic negligence of leaving decipherable cryptographic metadata embedded within the Justice Whyte Nowak July 2 Purported Direction must recognize the catastrophic, mathematically verifiable nature of that algorithmic error. The extraction of the t-4313-25 direction.docx (the "T-4313-25 Direction Docx") internal identifier conclusively proves the document was cloned directly from Mr. Alviano's 2025 Tax Court archives.

33. Furthermore, the operational motive driving Ms. Maya Jo Blake Janierre to act as a clandestine transmission proxy for the fabricated July 2 Direction was an unvarnished demonstration of fealty and reciprocation. It is submitted that this act was a calculated payback designed to show absolute loyalty to the very executive branch apparatus that afforded her unprecedented impunity, transitioning her into a government cooperating witness following severe 2021 criminal indictments. It strains judicial credulity that, absent the leverage derived from those specific criminal charges, she would subsequently secure illicit access to act as a valued administrative functionary within the precise union representing Mr. Ball and Mr. Curtis Mathews.

34. If any legal counsel addressed herein functioned as an architect, facilitator, or willful participant in the digital falsification of a judicial document, and the *ultra vires* substitution of the independent Federal Court of Canada Trial Division heraldic logo with the National Coat of Arms of Canada, such conduct is immediately suspendable and unequivocally disbarable; however, the formal adjudication of such severe professional misconduct shall be deferred to the Law Society of Ontario.

35. Notwithstanding the entirety of the aforementioned *ultra vires* machinations, the blatant jurisdictional evasions, the deployment of compromised proxy transmission nodes, and the sophisticated fabrication of digital templates, the Attorney General of Canada maintains a positive, continuous, and non-delegable legal obligation to cause the Requested Court Records to be provided forthwith.

PART VII: CONCLUSION AND ULTIMATE IMPERATIVES

36. In absolute summation, the non-negotiable, irrevocable temporal mandate for the immediate, unredacted production of the aforementioned Requested Court Records—strictly encompassing the Authentic Information Package, the underlying Criminal Code Form 2 Information, and all authentic Intake Court Endorsements—remains unequivocally fixed at noon tomorrow, July 20, 2026.

37. By providing the Requested Court Records by noon tomorrow, the Office of the Chief Justice of the Superior Court of Justice (Ontario) shall be promptly notified that the correct, verified Authentic Information Package has been successfully secured, explicitly highlighting the necessary inclusion of the instruments structurally routed through the originating court office responsible for bankruptcy, insolvency, or family law.

38. Failing absolute and strict compliance with this deadline, the full spectrum of appellate, supervisory, and disciplinary judicial remedies shall be relentlessly pursued. This pursuit will remain unyielding until this gross jurisdictional usurpation is comprehensively corrected, the rule of law is fully restored, and the systemic manipulation of the judicial record is entirely exposed before the appropriate, independent authorities.

39. The right is unequivocally reserved to rely upon this correspondence for any and all lawful purposes, strictly encompassing any present or future proceeding, and in support of any claim for costs, whether investigative, proceeding-based, or otherwise. Furthermore, the explicit

right is reserved to supplement this demand in a more fulsome manifestation as additional evidentiary matrices become known. Finally, a cordial yet absolute reminder is formally issued to all addressed legal counsel regarding their paramount professional obligations. This explicitly encompasses the strict prohibition against assisting, advising, or facilitating any fraud, crime, or unlawful act on behalf of any organization or entity, alongside the immutable, overarching duties owed continuously as officers of the court.

40. I also reserve the right to rely on this letter to timestamp the same for fraud I have not discovered or known about for purposes of unwinding or unravelling anything that must be unravelled on account of a special cause of nullity (see: SCC in *Landreville* citing *Lazarus Estates Ltd.*). This will of course be relied on as a further evidence why I have not been able to receive a "fair hearing" in Toronto as a situs or locus in any court (provincial or federal).

41. I shall convert this letter into PDF, not in the manner in which some have done with GrapeCity and PDF Xchange (formerly Tracker Software Products Ltd.) (see: Appendix (nota bene: it now appears that language from a Tax Court of Canada decision/other disposition was utilized but the logo of the Federal Court of Appeal was utilized which is eerily similar to the discombobulate efforts in the False Information Package), sign it and send a copy as well for formality purposes.

Yours truly,

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

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

Email: mclean@searchandseizure.ca

Enclosures

APPENDIX #1: [HTTPS://WWW.PDF-XCHANGE.COM/COMPANY/ABOUT-PDF-XCHANGE-CO-AND-TRACKER-SOFTWARE.HTML](https://www.pdf-xchange.com/company/about-pdf-xchange-co-and-tracker-software.html)

(nota bene: The Honourable AGC will note in the metadata for the Purported Direction False Document ascribed to Justice Whyte Nowak that the version of PDF-Xchange Editor is that of 10.71.399 so whomever has the license to the same is the culprit(s) of that falsification).

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Best regards,

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

Email: mclean@searchandseizure.ca

Phone: 647.370.9354

Fax: upon request

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