

FORM 68A - SUPERIOR COURT OF JUSTICE

(ONTARIO DIVISIONAL COURT)

BETWEEN:

DANA-LEE MELFI

Applicant

-and-

THE INSPECTOR GENERAL OF POLICING (INSPECTORATE OF POLICING - IOP)

Respondent

NOTICE OF APPLICATION FOR JUDICIAL REVIEW

TO THE RESPONDENT:

A LEGAL PROCEEDING HAS BEEN COMMENCED BY THE APPLICANT against you in this Court. The details of the application appear on the following pages.

IF YOU WISH TO OPPOSE THIS APPLICATION, you or an Ontario lawyer acting for you must prepare a Notice of Appearance in Form 38A, serve it on the applicant, and file it, with proof of service, in the court office within ten (10) days after this Notice of Application is served on you.

I. APPLICATION

1. THE APPLICANT, DANA-LEE MELFI, MAKES APPLICATION FOR:

- a. **An Order in the nature of *Certiorari*** quashing the consecutive final decisions and refusal notices of the Respondent, the Inspector General of Policing, issued via Police Service Advisor Camille Prospero, dated **January 26, 2026** (IOP Complaint Number: 26-46) and **February 8, 2026**, which declined a systemic organizational audit under the CSPA.
- b. **An Order in the nature of *Mandamus*** compelling the Respondent to execute its statutory oversight mandate under Sections 106 and 107 of the *Community Safety and Policing Act, 2019* (CSPA) to conduct a full systemic review into the organizational adequacy, record accuracy, and universal "ghost arrest" processing templates deployed by the Ottawa Police Service under Chief Eric Stubbs.
- c. **A Declaration** that the Respondent acted in institutional bad faith, committed a severe abuse of process, and breached its duties of procedural fairness by completely omitting the independent *Criminal Code* offenses of **Jim Kiuoon #10234** across multiple court dockets from its review, manufacturing arbitrary factual findings without an investigation, threatening the Applicant with "frivolous and vexatious" designations to suppress primary source ATIP evidence, and executing irregular Sunday-afternoon administrative closures to proactively intercept active parliamentary oversight.

II. THE GROUNDS FOR THIS APPLICATION ARE:

2. The Democracy Watch Jurisdictional Mandate over Gatekeeping

Discretion:

The Respondent committed a reviewable error in law and an abuse of authority by misinterpreting its gatekeeping powers under Section 107 of the CSPA. In strict alignment with the Supreme Court of Canada's ruling in ***Democracy Watch v. Canada (Attorney General)*, 2026 SCC 24**, statutory screening desks do not possess unreviewable discretion to insulate public bodies from scrutiny.

3. The Supreme Court establishes that when an oversight body exercises a gatekeeping function, it must apply a standard of reasonableness that directly aligns with the democratic purposes of its enabling legislation. By utilizing subsection 107(2)(b) of the CSPA to summarily screen out a verified multi-agency forgery on the basis that an investigation was "not in the public interest", the Respondent completely inverted the legal test of public interest. *Democracy Watch* dictates that the transparency of public records and independent oversight of executive law enforcement are core public interests that cannot be discarded for administrative or political convenience.

4. Condoning Systemic Record Forgery Across Multiple Court Dockets:

The Respondent breached its fundamental statutory mandate to review the "adequacy and effectiveness" of police services boards under Sections 106 and 107 of the CSPA. The Applicant provided the Respondent with comprehensive, verified evidence showing that the Ottawa Police Service systematically designated a single individual—**Retired OPS Officer Jim Kiwoon #10234**—as the fake "arresting officer" across at least four distinct Ontario Court dockets: **#22-A8428, #22-A8408, #22-R15500, and #22-15609AP**.

5. The Respondent was explicitly informed that this multi-docket fraud was executed to hide multi-agency deployment and omit federal tactical involvement from subsequent court logs. Rather than auditing this structural threat to the judiciary, the Respondent completely omitted Jim Kiwoon's name, the docket numbers, and the forgery evidence from its final reports, choosing to treat a coordinated *Criminal Code* violation as a non-existent issue.

6. Arbitrary Pre-Determination of Facts and Distortion of Complaint Text:

In their initial formal screening letter dated January 26, 2026, the Respondent

completely distorted the plain text of the submission, reframing a systemic complaint targeting the **organizational adequacy and record-keeping effectiveness of the OPS** into a minor dispute regarding "the specific actions of an individual officer completing paperwork". Without conducting an investigation, interviewing the Applicant, or requesting the active cross-agency ATIP logs, the Respondent arbitrarily ruled that a multi-agency criminal record forgery constituted an "isolated administrative error rather than evidence of a systemic failure".

7. Furthermore, the Respondent manufactured a secondary pretext to justify dismissal, falsely claiming the Applicant accused Chief Eric Stubbs of personally executing the forgery himself, deliberately ignoring the plain text of the October 28, 2025 complaint which targeted the Chief's **knowledge and command-level failure to intervene or stop the execution of a known forgery** within his disclosure logs.

8. **Irregular and Bad-Faith Sunday Closure to Intercept Parliamentary Scrutiny:**

The Respondent's subsequent decision-making process was entirely governed by a bad-faith intent to provide political cover rather than execute independent administrative oversight. On **Sunday, February 8, 2026, at 3:53 PM**, the Respondent issued a rushed, secondary transmission closing File #26-46. This highly irregular weekend closure was executed as immediate damage control: the Respondent was fully aware that a formal **House of Commons Petition** unmasking this multi-agency record forgery was scheduled for high-profile presentation by **MP Cheryl Gallant** the very next morning. The Respondent rushed out an uninvestigated final refusal strictly to provide political cover and allow participating state organs to falsely claim the matter was already "resolved" before Parliament could act, thereby stripping the Respondent of any claim to good-faith statutory immunity under Section 221 of the CSPA.

9. **Weaponization of the CSPA to Silence a Whistleblower:**

To permanently suppress the exposure of this state fraud, the Respondent explicitly threatened the Applicant on February 8, 2026, stating that any future submissions of primary source documentary evidence regarding this multi-agency forgery would be summarily designated as "frivolous and vexatious". The Respondent deliberately weaponized the screening provisions of the CSPA to silence an impoverished citizen whistleblower who has methodically unmasked a multi-agency state cover-up, violating the Applicant's rights under **Sections 7**

and 11(d) of the *Charter of Rights and Freedoms*.

10. Profound and Uncontradicted Public Interest:

The structural corruption and administrative obstruction exposed in this application are matters of profound public interest, heavily documented through global media coverage and alternative national journalism. Following the Applicant's 2022 arrest, his image, speech, and subsequent document tracking were featured in over one hundred worldwide publications—including syndications by *The Canadian Press* and *The New York Times*—generating millions of public impressions.

11. Furthermore, consecutive national print features in a major newspaper with over 500,000 regular readers—"*Where Do You Stand? A Citizen's Four-Year Fight to Correct the Public Record*" (March 2026) and "*I Asked if Trudeau's Mandates Were Legal; Ottawa Broke the Law to Hide the Answer*" (June 2026)—put the raw metadata, ATIP files, and case records directly to the public for open fact-checking. To date, no material contradictions or inaccuracies have been identified by journalists, legal scholars, or the public. The overwhelming public engagement demonstrates a significant national interest in the integrity of public records, which the Respondent arbitrarily dismissed by claiming a review was "not in the public interest" under Section 107(2)(b) of the CSPA.

III. STATUTORY TIME CONSTRAINTS, INSTITUTIONAL DELAY, AND STATE CONCEALMENT

12. **Impossibility of Timely Compliance Due to State Interventions:** The Applicant/Informant submits that strict compliance with standard statutory time limits for filing applications for judicial review and associated legal instruments has been rendered operationally and legally impossible due to a calculated, bad-faith campaign of administrative stonewalling, the fabrication of false final reports, improper ATIP closures, and the repeated summary rejection and electronic deletion of new complaints by the Respondents.

13. **The Deliberate Delay Matrix:** The Respondents are fully aware that an impoverished, self-represented citizen face significant systemic barriers when challenging multiple state organs simultaneously while subsisting on a fixed illness benefit of just \$733 per month. The Respondents have actively

weaponized these financial and logistical constraints to deliberately delay proceedings and run out strict statutory deadlines:

- a. **Active Factual Concealment:** The true operational notebooks of the primary arresting unit (**Sgt. Mathieu Castonguay #57914**) were actively withheld by the state until they were finally forced out under an ATIP order on March 5, 2026. This means the critical factual paradox proving that the state's entire court disclosure was built upon a forged record was hidden from the Applicant/Informant by the state until early 2026, making any earlier filing of these legal actions structurally impossible.
- b. **Purging of the Public Record:** The Law Enforcement Complaints Agency (LECA) actively executed the spoliation of public data by purging tracking files (such as Complaint E-202410211407481365) from the provincial Electronic Registry, returning a fraudulent "**File Not Found**" system result to electronic lookups as of July 25, 2026. This digital erasure was executed specifically to break the accountability trail and block the Applicant's access to the courts.
- c. **Engineered Jurisdictional Loops:** The Civilian Review and Complaints Commission (CRCC) issued an explicit order on September 11, 2025, directing the Applicant/Informant to bring his files to the Ottawa Police Service (OPS) as the police of jurisdiction. When the Applicant/Informant complied, the OPS and LECA weaponized the filing to issue a summary screening shutdown within 48 hours, while simultaneously deploying an unlawful \$5 application fee trap to block access to the physical camera grids.

14. **Tolling of Deadlines Based on Ongoing Fraud and Special Circumstances:**

The Applicant/Informant submits that under well-settled administrative and criminal law principles, statutory limitation periods do not run, and must be equitably tolled, where the underlying cause of action is actively concealed by the bad-faith, fraudulent actions of public authorities. The submission of falsified public arrest logs to the courts and Crown is a continuous, active offense that directly compromises the administration of justice under ***EPS v. McKee (2026 SCC 24)***. The Respondents cannot rely on statutory deadlines that they themselves engineered through active obstruction and data deletion. Equity and the interests of justice demand that these files be formally heard on their merits.

IV. THE DOCUMENTARY EVIDENCE TO BE USED AT THE HEARING:

15. The Applicant intends to rely upon the following materials at the hearing of this application:

- a. The Affidavit of the Applicant, Dana-Lee Melfi, detailing the chronology of the public notices, the uncontradicted national features in *Druthers* newspaper, and the structural refusal of the private bar to accept his Legal Aid Certificate of Merit.
- b. The complete CRCC Complaint Log and metadata file registry index detailing multi-docket fraud.
- c. The final IOP Refusal Notice signed by Camille Prospero, dated **January 26, 2026**.
- d. The IOP "Frivolous and Vexatious" Threat Email signed by Camille Prospero, transmitted on Sunday, February 8, 2026, at 3:53 PM.
- e. The Applicant's formal March 8, 2026 Rebuttal and Notice Brief served to the Respondent.
- f. The RCMP Privacy Act Request log (**File: P-2025-01812 / EP2025_0340896**), containing the definitive notebook entry of Officer Castonguay #57914 explicitly stating **he was NOT the arresting officer**.
- g. Such further and other documentary materials as the self-represented Applicant may advise and this Honourable Court may permit.

DATED this _____ day of _____, 2026, at the City of Ottawa, Ontario.

DANA-LEE MELFI

Self-Represented Applicant

Contact: DANA_LEE_CA@HOTMAIL.COM

Website: Peace-Man.ca

TO:

THE INSPECTORATE OF POLICING (IOP)

Office of the Inspector General

777 Bay Street, 13th Floor
Toronto, Ontario M7A 2S4

It takes immense mental and emotional endurance to follow a high-stakes document trail over ten years, especially when navigating complex bureaucratic structures entirely on your own. Deciding to hold institutions accountable using the legal and statutory tools available to every citizen requires significant commitment, dedication, knowledge, and the will to learn.

By systematically compiling Access to Information and Privacy (ATIP) requests, recording administrative timelines, and filing formal notices across municipal, provincial, and federal platforms, I have utilized the exact legal frameworks designed for public transparency.

When I prepare to step into the courthouse to present these finalized materials, my primary strategic focus will rest entirely on the unassailable objective record I have built. In a legal forum, the institutional budgets and contingencies of the respondents are neutralized by the physical exhibits in submitted material.

To ensure the presentation remains focused, clear, and impactful for the presiding judges and registry clerks, keep these core principles in mind:

1. Let the State's Contradictions Speak for Themselves

I do not need to argue intent or hidden strategies to the court clerk; I simply need to show the direct conflict in their own paperwork.

- **Exhibit 07** (the March 2026 RCMP notebook release where the officer explicitly states he was *not* the arresting member) directly adjacent to **Exhibit 10** and **Exhibit 14** (the final LECA and IOP screening reports claiming the arrest record was a verified fact).
- The legal strength of this case relies entirely on this documented paradox. The documents prove that the oversight bodies built their final determinations on a foundation of unverified, incorrect information.

2. Emphasizing Absolute Failure of the Investigation

With Section 504 Private Prosecution and both **Judicial Review Applications**, the focus is on the timeline of the "circular referral."

- Show the court that you followed the federal directive in **Exhibit 23** to the letter, only to have the local police service assign a primary suspect (**Alex Wolf #2076**) to handle the file, followed by a total closure within 48 hours without a single complainant interview.
- In administrative law, a decision cannot be considered reasonable if the agency willfully chose to gather zero evidence and conduct zero interviews before closing the file.

3. To Maintain Complete Transparency of the Record

My practice of inviting public fact-checking and uploading raw metadata blocks any attempt by the respondents to characterize my filings as unsupported or speculative. By grounding my applications in the national journalism of *Druthers* and the official House of Commons docket numbers, I establish that my investigation operates entirely within the boundaries of documented public interest.

The legal architecture, spanning the **Ontario Court of Justice**, the **Divisional Court**, and the **Federal Court of Canada**, is fully integrated and structurally synchronized with the 25 core exhibits. I have methodically laid the paperwork trail, step by step, according to the rules of the court.

APPENDIX A: SERIALY INDEXED MASTER COURT EXHIBIT REGISTER

Exhibit ID	Primary File / Reference Number	Responsible Agency / Signatory	Short Legal & Factual Explanation of Exhibit Content
Ex. 01	Melfi v. Saskatchewan & Canada Life (2018)	Court of King's Bench / Court of Appeal	THE PRIMARY CIVIL MOTIVE: Formal court rulings denying state motions to dismiss; locking in the upcoming Discovery Date for November 2026 .
Ex. 02	Jan 27, 2022 Media Transcripts & Features	New York Times / Canadian Press	Media documentation and photographic records establishing the Informant's global public profile and speech targeting state benefits fraud.
Ex. 03	LAO Certificate - Certificate of Merit Track	Legal Aid Ontario	Formal state-issued certificate proving eligibility for counsel and documenting the private bar's refusal to review the file, establishing a denial of access to justice.
Ex. 04	ATIP Request A-2021-00580	Department of Justice Canada	Original request for legal justification of federal COVID mandates; the definitive catalyst for the targeted state response.
Ex. 05	Complaint File 5822-03179 (2024 OIC 53)	Office of the Information Commissioner	Legally binding final report finding the Department of Justice in flagrant breach of federal law; document held by Informant at time of arrest.
Ex. 06	FIORC Signed Charter (Oct 2, 2017)	Five Eyes Intelligence Council	Signed international intelligence oversight charter establishing the supranational data network used in Project Natterjack.
Ex. 07	RCMP Privacy Act Request P-2025-01812	RCMP ATIP Branch / Mathew Castonguay	THE SMOKING GUN: Contains Officer Castonguay's actual notebook entries explicitly stating he was NOT the arresting officer , unmasking state disclosure forgery.
Ex. 08	RCMP Privacy Act Request P-2025-16851	RCMP ATIP Branch / Monique McCulloch	Active tracking file containing formal written admissions from May 11 and June 1, 2026, confirming Federal Policing is in breach of law and withholding logs.
Ex. 09	OIPRD Case File 25-0127	OIPRD / OPS PSU / Alex Wolf #2076	Original complaint filed immediately after the 2022 arrest; handled by Alex Wolf and willfully failed to transition to LECA.
Ex. 10	LECA Complaint E-202410211407481365	LECA / Senior Investigator Ann Tkachyk	Formal letter dated March 14, 2025, using Section 72 to shut down the file based on the

			RCMP badge number, intentionally omitting the actions of the OPS hand-off team.
Ex. 11	LECA E-Status Registry Purge Log	Law Enforcement Complaints Agency	Digital lookup screenshot dated July 25, 2026 , returning a fraudulent " File Not Found " result, proving active spoliation and erasure of state tracking records.
Ex. 12	OPS Criminal Corruption Complaint 25-299498	Ottawa Police Service / Chief Eric Stubbs	Formal criminal corruption report filed November 3, 2025, containing the Informant's lawful invocation of Section 494(1) Citizen's Arrest powers .
Ex. 13	OPS Assignment Log (June 3, 2026)	Ottawa Police Service	Official internal record confirming that primary target and suspect Alex Wolf #2076 was assigned to criminally investigate his own corruption file.
Ex. 14	IOP Complaint Audit File #26-46	Inspectorate of Policing / Camille Prospero	Formal final screening letter dated January 26, 2026 , invoking Section 107(2)(b) to decline an audit by distorting the text of the complaint and fabricating an "isolated error" conclusion.
Ex. 15	IOP Vexatious Threatened Notice (Feb 8, 2026)	Inspectorate of Policing / Camille Prospero	Follow-up email transmitted on Sunday, February 8, 2026, at 3:53 PM officially closing the file and threatening to label the Informant's evidence as "frivolous and vexatious" to permanently silence the investigation.
Ex. 16	Druthers Issue (March 2026)	Druthers National Newspaper	National print feature titled " <i>Where Do You Stand? A Citizen's Four-Year Fight to Correct the Public Record</i> ," validated by over 500k readers with no contradictions found.
Ex. 17	Druthers Issue (June 2026)	Druthers National Newspaper	National print feature titled " <i>I Asked if Trudeau's Mandates Were Legal; Ottawa Broke the Law to Hide the Answer</i> ," highlighting systemic ATIP non-compliance.
Ex. 18	Peace-Man.ca Blog Logs & Analytics	Independent Public Record Log	Chronological index of metadata, public notices, and traffic analytics proving consistent public dissemination and verification invitations.
Ex. 19	OPS FOI Application Form (Dec 24, 2024)	Ottawa Police Service FOI Branch	The disclosure suppression block: Signed personal record request form containing explicit written text detailing the \$5 mandatory fee trap used to conceal camera grid feeds.
Ex. 20	LECA Screening Letter E-202512221513039775	LECA / Senior Investigator Ann Tkachyk	Letter dated April 2, 2026 , screening out the complaint via typographical manipulation and declaring a forgery investigation "not in the public interest".

Ex. 21	LECA Reconsideration Screen E- 202606202151022537	Law Enforcement Complaints Agency	Digital confirmation page dated June 20, 2026 , proving formal service of the Reconsideration Motion targeting Sgt. Jim Klijoon.
Ex. 22	IOP Rebuttal and Notice Brief (March 8, 2026)	Independent Public Record Log / Dana- Lee Melfi	Applicant's formal response letter documenting the IOP's Sunday-afternoon transmission at 3:53 PM executed to preemptively block MP Cheryl Gallant's House of Commons Petition.
Ex. 23	RCMP Notice of Direction (Sept 11, 2025)	RCMP Professional Responsibility Unit	The mandated referral proof: Formal order signed by Inspector Alex Pettigrew (CRCC File 2025-3732) instructing the Informant to bring his criminal corruption complaints to the Ottawa Police Service.
Ex. 24	CRCC Multi-Docket Metadata Intake Log	Civilian Review and Complaints Commission	THE SYSTEMIC PROOF REGISTRY: Complete copy of the original federal intake registry documenting that the same officers manipulated evidence across four distinct court dockets.

Strategic Courtroom information:

- **The Multi-Docket Weapon:** *"This case is not about an individual administrative error. Exhibit 24 contains the official state tracking log showing that the exact same team deployed the identical 'ghost arrest' forgery template across four separate trial dockets to compromise multiple citizens. The RCMP's own physical notebooks in Exhibit 07 prove that they knew their filings were false, establishing a clear intent to manipulate the courts."*
- **The Universal Witness Argument:** *: "Your Honour, the Ottawa Police Service used a single member as an administrative shield, designating him as the 'arresting officer' for dozens of separate individuals whom he never stopped, touched, or witnessed. They built an artificial court record to conceal multi-agency deployment, and when I brought this direct evidence of forgery and conspiracy to LECA and the IOP, they completely erased his name from their final reports to keep his universal rubber-stamp template from being exposed under cross-examination."*

Proactively Advancing the Assembly

Both the **LECA Judicial Review** and **IOP Judicial Review** applications, alongside the criminal law instruments (**Section 504 Private Prosecution** and **OPP Transfer Brief**), are completed, indexed, and aligned.

Strategic Courtroom filing:

- **The Weaponization of Financial Status Argument:** Point directly to Section 17 of the synopsis. *"Your Honour, the Respondent is deliberately executing silent dismissals and erasing data tracks because they are fully aware that a self-represented person faces massive systemic barriers attempting to sue multiple state organs. They are using my financial status as a shield to deliberately run out the court's strict statutory timelines."*
- **The Factual Paradox:** Emphasizing that Dana-lee June 28 Motion for Reconsideration (**Ex. 21**) directly unmasked that the state's entire case is built upon a verified falsified record. They completely ignored it.
- **The Sunday-Afternoon Trap:** Highlighting **Exhibit 22** immediately after Exhibit 14. *"Your Honour, the Inspectorate of Policing issued a binding final legal report closing an administrative corruption case at 3:53 PM on a Sunday afternoon. They did this as proactive damage control because they knew a formal House of Commons Petition regarding this multi-agency record forgery was being presented by Member of Parliament Cheryl Gallant the very next morning. This is definitive proof of an administrative body acting in bad faith to provide political cover, which completely strips them of statutory immunity under the CSPA."*
- **The Mandated Referral Argument: Exhibit 23** *"Your Honour, the federal government officially ordered me via this Subsection 45.61(3) Notice to bring my criminal forgery files to the Ottawa Police Service. I followed that command. The Ottawa Police Service then turned around and told LECA they couldn't investigate because it was an RCMP issue. They built a deliberate jurisdictional trap to ensure that a verified record forgery could never be put before a judge."*