

Court File No.: CV-24-00095074-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N :

EDWARD CORNELL, VINCENT GIRCYS, LINDSAY MILNER, SHAUN ZIMMER, ANDREW MILLER, JONKER TRUCKING INC., ANDREW FERA, WAYNE NARVEY, CLAYTON MCALLISTER, KATHLEEN MARKO, NICOLA FORTIN, ARIELLE FORTIN, THOMAS QUIGGIN, TIMOTHY TIESSEN O'JAY LAIDLEY, ERIC BUECKERT, PETER TERRANOVA, NANCY TERRANOVA, RICHARD OCELAK, and KERRI-ANN HAINES

Plaintiffs

-and-

JUSTIN TRUDEAU, CHRYSTIA FREELAND, DAVID LAMETTI, DOMINIC LEBLANC, BILL BLAIR, MARCO MENDICINO, ATTORNEY GENERAL OF CANADA, JODY THOMAS, ROYAL CANADIAN MOUNTED POLICE, DENIS BEAUDOIN, BRENDA LUCKI, STEVE BELL, ROBERT BERNIER, OTTAWA POLICE SERVICES BOARD, OTTAWA POLICE SERVICE, THE TORONTO-DOMINION BANK, CANADIAN IMPERIAL BANK OF COMMERCE, BANK OF MONTRÉAL, NATIONAL BANK OF CANADA, ROYAL BANK OF CANADA, BANK OF NOVA SCOTIA (SCOTIABANK), CANADIAN TIRE SERVICES LTD. doing business as CANADIAN TIRE BANK, MERIDIAN CREDIT UNION, ASSINIBOINE CREDIT UNION, GULF & FRASER CREDIT UNION, STRIDE CREDIT UNION, SIMPLII FINANCIAL, CANADIAN ANTI-HATE NETWORK, BERNIE FARBER, JOHN DOE, and ABC CORP.

Defendants

**MOTION RECORD OF THE MOVING PARTIES,
CANADIAN ANTI-HATE NETWORK AND BERNIE FARBER**

(Motion Returnable July 5, 2024)

May 31, 2024

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Defendants

NOTICE OF MOTION

The defendants, Canadian Anti-Hate Network (“CAHN”) and Bernie Farber (“**Mr. Farber**”), will make a motion to a Judge, on Friday, July 5, 2024 at 10:00 a.m., or as soon after that time as the motion can be heard at 161 Elgin Avenue, Ottawa, Ontario.

PROPOSED METHOD OF HEARING: The motion is to be heard in-person.

THE MOTION IS FOR:

1. An Order dismissing the action against the Defendants CAHN and Mr. Farber, pursuant to s. 137.1 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43, as amended;
2. Costs of the motion and the action on a full indemnity basis pursuant to s. 137.1(7) of the *Courts of Justice Act*;
3. Damages against the Plaintiffs, on a joint and several basis, in the amount of \$20,000 for Mr. Farber and \$10,000 for CAHN, pursuant to s. 137.1(9) of the *Courts of Justice Act*;
4. Such further and other relief as counsel may advise and this Honourable Court deems just.

THE GROUNDS FOR THE MOTION ARE:

1. On February 14, 2024, the Plaintiffs commenced a claim by way of Notice of Action (Court File No. CV-24-00094733-0000) against 31 defendants for \$44,000,000.00 arising from alleged damages supposedly related to the implementation of the *Emergencies Act* on February 14, 2022.
2. On March 15, 2024, in a manner contrary to the *Rules of Civil Procedure*, the Plaintiffs purported to issue a Statement of Claim following a Notice of Action, but instead issued a new Statement of Claim bearing Court File No. CV-24-00095074-0000.
3. The Plaintiffs are alleged to be individuals and/or business that purport to have suffered losses because of their involvement in protests that occurred in the City of Ottawa in January and February 2022 (the “**Ottawa Protests**”), which culminated with the Government of Canada’s invocation of the *Emergencies Act*.
4. The Defendant, CAHN, is an independent, nonprofit organization with its business address in Toronto. It is comprised of a diverse membership of experts and researchers on issues related to hate groups and hate crimes. It has a mandate of monitoring, researching, and countering hate

groups by providing education and information on hate groups to the public, media, researchers, courts, law enforcement, and community groups.

5. The Defendant, Bernie Farber, is an individual and the founding chair emeritus of CAHN.

6. The action, as against CAHN and Mr. Farber, is a strategic lawsuit against public participation.

7. As a result of the unusual way the Statement of Claim is drafted, which is itself an indication that this is a strategic lawsuit against public participation, the specific allegations against CAHN and Mr. Farber are vague and unclear, contrary to the rules applicable to pleadings.

8. It appears that the claim against CAHN and Mr. Farber principally relates to allegations that they would have “provided false information”, either directly or through “proxies” about the Ottawa Protests and those involved with those protests (which the Plaintiffs appear to admit includes them), which defamed them and caused the Government of Canada to invoke the *Emergencies Act*. The Statement of Claim alleges that these actions were taken to advance “the political agenda” of CAHN and Mr. Farber.

9. The Statement of Claim advances conspiracy theories involving CAHN.

10. Any impugned expression made by CAHN or Mr. Farber involving the Ottawa Protests, which are not particularized in the Statement of Claim, were necessarily concerning a matter of public interest.

11. Any claim based on impugned expression made by CAHN or Mr. Farber around the time of the Ottawa Protests is outside of the applicable limitation period, either as a result of the provisions of the *Libel and Slander Act* or as a result of the provisions of the *Limitations Act, 2002*.

12. No actual statements or expressions are attributed to CAHN and/or Mr. Farber in the claim. There are no details surrounding these supposed impugned expressions, including what was said,

to whom it was said, and the defamatory meaning that arose out of these supposed impugned expressions.

13. There are no reasonable grounds to believe that the proceeding has substantial merit.

14. CAHN and Mr. Farber have valid defences to the proceeding because, *inter alia*:

- a. With respect to the claim in defamation, any impugned expression (which have not been pleaded nor particularized), would, in any event, not be defamatory, and likely attract the defence of justification and/or fair comment and/or qualified privilege and/or responsible communication on a matter of public interest.
- b. With respect to the claim in negligence, CAHN and Mr. Farber owed no duty of care to the Plaintiffs.
- c. With respect to the claim in civil conspiracy, CAHN and Mr. Farber did not engage in any unlawful conduct, nor did they act in concert, by agreement or with a common design or intention with any of the other named Defendants.

15. There is no causal link between the unspecified impugned expressions (or any other conduct alleged to have been taken by CAHN and Mr. Farber) and the damages the Plaintiffs claim to have suffered.

16. The public interest in protecting CAHN and Mr. Farber's expression outweighs the public interest in permitting the proceeding to continue.

17. The Plaintiffs' claim advances a request for declaratory relief on unusual, spurious, scandalous and vexatious grounds, including that the Defendants "acted in panic, political spite and with the intention of punishing and intimidating citizens of Canada" and that they are to pay "for damage and costs pleaded herein and that the citizens of Canada not be required to pay".

18. The Plaintiffs claim damages against CAHN and Mr. Farber for *Charter* breaches, negligence, breach of contract, interference with economic relations, inducing breach of contract, unlawful interference, misfeasance of public office, trespass to chattels, civil conspiracy, abuse of process, injurious falsehoods, defamation, assault, battery, harassment and intimidation.

19. The Statement of Claim discloses no reasonable cause of action against CAHN and Mr. Farber.

20. The claim pleaded constitutes numerous unrelated claims against unrelated defendants and is effectively an abuse of process.

21. There is no basis to join CAHN and Mr. Farber in, what appears to be, at its core, a constitutional challenge against various government entities.

22. Based solely on the way the claim is drafted and advanced, including the exorbitant claim for \$44,000,000 on a joint and several basis, it is apparent that the purpose of the litigation is to silence perceived political opponents of the Plaintiffs and stifle debate about a matter of significant public interest.

23. The claim appears to be a politically motivated action and not a *bona fide* legal claim.

24. The Plaintiffs brought this proceeding against CAHN and Mr. Farber in bad faith and for an improper purpose. As such, damages should be awarded against the Plaintiffs pursuant to s.

137.1(9) of the *Courts of Justice Act*.

25. The *Limitations Act*, 2002, S.O. 2002, c. 24, Sched. B

26. The *Libel and Slander Act*, R.S.O. 1990, c. L.12.

27. Rule 37 of the *Rules of Civil Procedure*.

28. Section 137.1 of the *Courts of Justice Act*; and,

29. Such further and other grounds as counsel may advise.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the Motion:

1. The affidavit of Bernie Farber, to be sworn;
2. The affidavit of Richard Warman, to be sworn; and,
3. Such further and other evidence as counsel may advise and this Honourable Court may permit.

May 29, 2024

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EDWARD CORNELL et al.
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-and-

JUSTIN TRUDEAU et al.
Defendants

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Proceeding commenced at Ottawa

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Defendants

NOTICE OF ACTION

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiffs. The claim made against you is set out in the statement of claim served with this notice of action.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service, in this court office, **WITHIN TWENTY DAYS** after this notice of action is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date: February 14, 2024

Issued by:

Local Registrar

Address of court office: Ottawa Courthouse
161 Elgin St., 2nd Fl.
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- TO: STEVE BELL**
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Stn T; PO Box 9634
Ottawa, Ontario K1G 6H5
- TO: ROBERT BERNIER**
Ottawa Police Service
Stn T; PO Box 9634
Ottawa, Ontario K1G 6H5
- TO: OTTAWA POLICE SERVICES BOARD**
110 Laurier Avenue W
Ottawa, Ontario K1P 1J1
- Mailing Address:**
c/o Ottawa Police Service, Stn T; PO Box 9634
Ottawa, Ontario K1G 6H5
- TO: OTTAWA POLICE SERVICE**
Stn T; PO Box 9634
Ottawa, Ontario K1G 6H5
- TO: ROYAL CANADIAN MOUNTED POLICE**
RCMP National Headquarters

Headquarters Building
73 Leikin Drive
Ottawa, Ontario K1A 0R2

TO: DENIS BEAUDOIN
RCMP National Headquarters
Headquarters Building
73 Leikin Drive
Ottawa, Ontario K1A 0R2

TO: BRENDA LUCKI
RCMP National Headquarters
Headquarters Building
73 Leikin Drive
Ottawa, Ontario K1A 0R2

TO: JODY THOMAS
Office of the Deputy Attorney General of Canada 284
Wellington Street
Ottawa, Ontario K1A 0H8

TO: BERNIE FARBER
439 University Ave
Toronto, Ontario M5G 1Y8

TO: THE TORONTO-DOMINION BANK
66 Wellington Street West
Toronto, Ontario M5K 1A2

TO: CANADIAN IMPERIAL BANK OF COMMERCE
81 Bay St.
Toronto, Ontario M5J 1E6

TO: SIMPLII FINANCIAL
595 Bay St, Fl 6
Toronto, Ontario, M5G 2C2

TO: BANK OF MONTREAL
100 King Street West
1 First Canadian Place, 9th Floor
Toronto, Ontario M5X 1A1

TO: NATIONAL BANK OF CANADA
800 Saint-Jacques Street
Montreal, Quebec H3C 1A3

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- TO: ROYAL BANK OF CANADA**
200 Bay Street, South Tower
Toronto, Ontario M5J 2J5
- TO: BANK OF NOVA SCOTIA (SCOTIABANK)**
Scotiabank Head Office
44 King St West
Toronto, Ontario M5H 1H1
- TO: MERIDIAN CREDIT UNION**
Meridian Credit Union Corporate Office
3280 Bloor Street West, Centre Tower, 7th Floor
Toronto, Ontario M8X 2X3
- TO: ASSINIBOINE CREDIT UNION**
200 Main St., 6th Floor
Winnipeg, Manitoba R3C 1A8
- TO: GULF & FRASER CREDIT UNION**
Suite 401 - 7300 Edmonds Street
Burnaby, British Columbia V3N 0G8
- TO: STRIDE CREDIT UNION**
Stride Credit Union Corporate Office
19 Royal Road N
Portage La Prairie, Manitoba R1N 1T9
- TO: CANADIAN ANTI-HATE NETWORK**
439 University Ave
Toronto, Ontario M5G 1Y8
- TO: CANADIAN TIRE SERVICES LTD., doing business as CANADIAN TIRE BANK**
Canadian Tire Head Office
Corporate Home Office
2180 Yonge Street
Toronto, Ontario M4P 2V8

CLAIM

Relief Claimed

1. The Plaintiffs are Canadian individuals and Canadian businesses who were subjected to the unreasonable use of the *Emergencies Act*, RSC 1985, c 22 (4th Supp) (the “**Emergencies Act**”) and claim against the Defendants, jointly and/or severally, for:
 - a. A declaration that the Crown Defendants, as defined herein below, acted unlawfully when they issued Order in Council P.C. 2022-106, the *Proclamation Declaring a Public Order Emergency*, SOR/2022-20 (the “**Proclamation**”); Order in Council P.C. 2022-107, the Emergency Measures Regulations, SOR/2022-21 (the “**Regulations**”); and Order in Council P.C. 2022-108, the Emergency Economic Measures Order, SOR/2022-22, (the “**Economic Order**”) (collectively hereinafter referred to as the “**Unlawful Enactments**”);
 - b. A declaration that the Defendants acted unlawfully and in breach of section 8 of the *Canadian Charter of Rights Freedoms – Part I of the Constitution Act*, 1982 adopted as Schedule B to the *Canada Act 1982*, 1982, c. 11 (U.K.) (the “**Charter**”) when they seized, froze, or otherwise interfered with the financial services, private property, products, and information of the Plaintiffs;
 - c. A declaration that the Defendants acted unlawfully and in breach of section 2(b) of the Charter with regards to the unconstitutional Regulations;
 - d. A declaration that the Financial Institution Defendants as defined herein below, acted in breach of legislation, contract, and common law when they

- seized, froze, or otherwise interfered with the financial services, private property, products, and information of the Plaintiffs;
- e. A declaration that the Defendants acted in panic, political spite, and with the intention of punishing and intimidating citizens of Canada;
 - f. General and special damages in an amount not exceeding \$500,000 for each Plaintiff for negligence, breach of contract, unlawful interference, misfeasance of public office, trespass to chattels, civil conspiracy, and abuse of process for the unlawful seizure of bank accounts by the Defendants;
 - g. General and special damages in an amount not exceeding \$100,000 for each Plaintiff for injurious falsehoods and defamation resulting from the conduct of the Defendants;
 - h. General and special damages in an amount not exceeding \$100,000 for each Plaintiff for negligence, assault, battery, harassment, and intimidation perpetrated by the Defendants against the Plaintiffs;
 - i. General and special damages pursuant to section 24(1) of the Charter in an amount not exceeding \$50,000 for each Plaintiff for the Defendants' unjustified breach of the Plaintiffs' Charter rights;
 - j. Punitive, exemplary and/or aggravated damages in the amount of \$1,000,000 for each Plaintiff considering the malicious, reprehensible, and high-handed misconduct of the Defendants;
 - k. prejudgment and post judgment interest in accordance with the *Courts of Justice Act*, RSO 1990 c.C.43;

1. costs of this action (legal fees and disbursements) on a substantial indemnity basis plus applicable harmonized sales tax in accordance with the *Excise Tax Act*, RSC, 1985, c. E-15 and the *Courts of Justice Act*, RSO 1990 c.C.43; and
- m. Such further and other relief as this Honourable Court deems just.

The Plaintiffs

2. All of the Plaintiffs are either individuals or businesses who had their financial accounts and private property including banking and credit cards, cryptocurrency, and other financial instruments frozen and unlawfully seized following the Unlawful Enactments in February of 2022.
3. Many of the Plaintiffs were also injured by the tortious conduct of any or all of the Defendants to this action preceding, during, and following the Unlawful Enactments. Some of the Plaintiffs are suffering continuing damages.
4. Importantly, not all of the Plaintiffs participated in the Ottawa Protests as defined herein below, or even supported the Ottawa Protests. Some individual Plaintiffs were the victims of the Unlawful Enactments as joint account holders despite never having stepped foot in Ottawa during the Ottawa Protests.
5. The Plaintiff, Vincent Gircys (“**Mr. Gircys**”), is an individual resident in Fronthill, Ontario.
6. The Plaintiff, Andrew Miller (“**Mr. Miller**”), is an individual resident in Annan, Ontario.

7. The Plaintiff, O'Jay Laidley ("**Mr. Laidley**"), is an individual resident in Brantford, Ontario.
8. The Plaintiff, Lindsay Milner ("**Ms. Milner**"), is an individual resident in Oshawa, Ontario.
9. The Plaintiff, Clayton McAllister ("**Mr. McAllister**"), is an individual resident in Dorchester, Ontario.
10. The Plaintiff, Thomas Quiggin ("**Mr. Quiggin**"), is an individual resident in Ottawa, Ontario.
11. The Plaintiff, Peter Terranova ("**Mr. Terranova**"), is an individual resident in Bright, Ontario.
12. The Plaintiff, Nancy Terranova ("**Ms. Terranova**"), is an individual resident in Bright, Ontario.
13. The Plaintiff, Richard Ocelak ("**Mr. Ocelak**"), is an individual resident in Scotland, Ontario.
14. The Plaintiff, Kerri-Ann Haines ("**Ms. Haines**"), is an individual resident in Scotland, Ontario.
15. The Plaintiff, Jonker Trucking Inc. ("**Jonker Trucking**"), is a corporation duly incorporated pursuant to the laws of Ontario and carrying on business in Caistor Centre, Ontario.
16. The Plaintiff, Edward Cornell ("**Mr. Cornell**"), is an individual resident in Shediac Cape, New Brunswick.

17. The Plaintiff, Shaun Zimmer (“**Mr. Zimmer**”), is an individual resident in Winnipeg, Manitoba.
18. The Plaintiff, Erik Bueckert (“**Mr. Bueckert**”), is an individual resident in Rossendale, Manitoba.
19. The Plaintiff, Andrew Fera (“**Mr. Fera**”), is an individual resident in Lethbridge, Alberta.
20. The Plaintiff, Wayne Narvey (“**Mr. Narvey**”), is an individual resident in McNamee, New Brunswick.
21. The Plaintiff, Kathleen Marko (“**Ms. Marko**”), is an individual resident in Grand Forks, British Columbia.
22. The Plaintiff, Timothy Tiessen (“**Mr. Tiessen**”), is an individual resident in Grand Forks, British Columbia.
23. The Plaintiff, Nicola Fortin (“**Mr. Fortin**”), is an individual resident in Strathmore, Alberta.
24. The Plaintiff, Arielle Fortin (“**Ms. Fortin**”), is an individual resident in Strathmore, Alberta.

The Defendants

Federal Crown Defendants

25. The Defendant the Attorney General (Canada) (“**Canada**”) is the representative of His Majesty the King in Right of Canada (“**HMK**” or the “**Crown**”) and is named in these proceedings pursuant to section 23(1) of the *Crown Liability and Proceedings Act*, RSC 1985, c C-50 (the “**CLPA**”).

26. The Crown as represented by Canada pursuant to s. 3(b) of the CLPA is responsible at law for any tort committed by any servant of the Crown, including, any and all servants of the Crown who unlawfully committed torts against the Plaintiffs, namely:

- a. The Royal Canadian Mounted Police (“RCMP”) pursuant to section 36 of the CLPA;
- b. Mr. Denis Beaudoin, Director of Financial Crime for the RCMP;
- c. Ms. Brenda Lucki, Commissioner of the RCMP (as she was then);
- d. The Prime Minister of Canada, The Right Honourable Justin Trudeau;
- e. The Deputy Prime Minister, the Honourable Chrystia Freeland;
- f. The Minister of Public Safety, the Honourable Marco Mendicino (as he was then);
- g. The Minister of Justice, the Honourable David Lametti (as he was then);
- h. The Minister of Emergency Preparedness, the Honourable Bill Blair;
- i. The Minister of Intergovernmental Affairs the Honourable Dominic LeBlanc; and
- j. Ms. Jody Thomas, National Security and Intelligence Advisor.

(Collectively, the Crown and its servants above, as represented by Canada shall be referred to as the “**Crown Defendants**”).

Financial Institutions

27. The financial institutions identified individuals, provided financial information, interfered with private property, and seized financial products, information and

services of the Plaintiffs including but not limited to their bank accounts and credit cards.

28. The Toronto-Dominion Bank is a Canadian financial institution, headquartered in Toronto, Ontario.
29. The Canadian Imperial Bank of Commerce (“CIBC”) and their electronic division Simplii Financial is Canadian financial institution, headquartered in Toronto, Ontario.
30. Bank of Nova Scotia is a Canadian financial institution headquartered in Toronto, Ontario.
31. The Bank of Montreal is a Canadian financial institution headquartered in Toronto, Ontario.
32. The National Bank of Canada is a Canadian financial institution headquartered in Montreal, Quebec.
33. The Royal Bank of Canada is a Canadian financial institution headquartered in Toronto, Ontario.
34. Canadian Tire Services Ltd., doing business as Canadian Tire Bank is a Canadian financial institution headquartered in Toronto, Ontario.

(collectively, the above banking institutions will be hereinafter referred to as the “**Bank Defendants**”)

35. The Meridian Credit Union is a cooperative credit union headquartered in Toronto, Ontario.

36. Assiniboine Credit Union is a cooperative credit union headquartered in Winnipeg, Manitoba

37. Gulf & Fraser Credit Union is cooperative credit union headquartered in Burnaby, British Columbia.

38. Stride Credit Union is a cooperative credit union headquartered in Portage la Prairie, Manitoba

(Collectively, the cooperative credit union Defendants above will be hereinafter referred to as the “**Credit Union Defendants**”)

39. Collectively, all of the Bank Defendants and the Credit Union Defendants shall be hereinafter referred to as the “**Financial Institution Defendants**”.

Localized Police Organizations

40. The Ottawa Police Services Board (the “**OPSB**”) is the representative of members of the Ottawa Police Service and is named in these proceedings pursuant to section 50(1) of the *Police Services Act*, RSO 1990, c P.15 (the “**PSA**”).

41. The Ottawa Police Service (“**OPS**”) is the municipal police force headquartered in Ottawa, Ontario.

42. Steve Bell (“**Chief Bell**”) is an individual residing in Ottawa, Ontario and was the Deputy Chief of Police for the OPS and later Interim Chief of Police for the OPS at the relevant time of this action. The OPS is named as a representative of Chief Bell in his capacity as member of the OPS in these proceedings.

43. Superintendent Robert Bernier (“**Bernier**”) is a member of OPS and an individual residing in Ottawa, Ontario and was overall Event Commander for the Integrated Public Order Unit operation at the relevant time of this action.

Non-Profit Organizations

44. The Canadian Anti-Hate Network (“**CAHN**”) is an independent, nonprofit organization headquartered in Toronto, Ontario.
45. Bernie Farber (“**Mr. Farber**”), is an individual and the founding chair emeritus of CAHN.
- (collectively, the CAHN and Mr. Farber, are hereinafter referred to as the “**CAHN Defendants**”).

John Doe Defendants

46. Several unidentified individuals committed torts against the Plaintiffs before, during, and after the Unlawful Enactments. These include but are not limited to members of the police organizations involved in the enforcement of the Unlawful Enactments and members and servants of the Crown.
47. The Plaintiffs reserve all their rights to bring suit against these unnamed and yet unknown Defendants.

ABC Corp. Defendants

48. It may be discovered during the course of this action that additional entities, both public or private, committed torts against the Plaintiffs. The Plaintiffs reserve all their rights to bring suit against these unnamed and yet unknown Defendants.

The Nature of the Action

49. In response to public health measures made in early 2022 and for various other reasons, a group of Canadian individuals and businesses launched a protest often referred to as the Freedom Convoy. In late January 2022, participants travelled to Ottawa, Ontario to protest (the “**Ottawa Protest**”).
50. On February 14 and 15, 2022, the Crown, relying on s. 17(1) and s. 19(1) of the Emergencies Act, issued the Unlawful Enactments.
51. Leading up to the Unlawful Enactments during the Ottawa Protests, several Defendants, acting together, or acting individually, as the case may be:
 - a. Made public and widely publicized denigrating and derogatory comments falsely characterizing the nature, scope, and motives of the persons participating in the Ottawa Protests including some of the Plaintiffs;
 - b. Published and widely distributed written material including defamatory comments about the Ottawa Protests knowingly containing false and misleading information about the Ottawa Protests;
 - c. Conspired with major Canadian media outlets to publish false reports about the activities of the protestors present at the Ottawa Protests;
 - d. Made false reports regarding the activities of the protestors present at the Ottawa protests to Crown officials and made false statements to Crown officials in such a way that promoted the Unlawful Enactments;
 - e. Sought to harm, injure, or otherwise denigrate the reputations of the Plaintiffs with malicious intent; and

- f. Made such further and other public statements and publications which denigrated and harmed the reputations of the Plaintiffs as will be discovered at the trial of this action.
52. The conduct of the Defendants, and the false information which was disseminated by several Defendants to the Canadian media, the Financial Institution Defendants, the Crown and the citizens of Canada influenced and enabled the decision to invoke the impugned Unlawful Enactments.
53. Following the Unlawful Enactments financial products, private property, information and services of several Canadians, including the Plaintiffs, were unlawfully seized or otherwise frozen by the Financial Institution Defendants acting in concert with the RCMP and Crown Defendants.
54. Following the Unlawful Enactments several Plaintiffs who were participating in the Ottawa Protests were physically injured, battered, assaulted, or otherwise harmed by the RCMP and OPS who were engaging in enforcement actions pursuant to the Unlawful Enactments.
55. The Defendants caused damage to the Plaintiffs who are all Canadians or Canadian businesses, including Indigenous peoples, senior citizens, retired police officers, decorated military veterans, minorities, minors, and people with disabilities.
56. In *Canadian Frontline Nurses v. Canada (Attorney General)*, 2024 FC 42 (the “**Mosley Decision**”), the Honourable Mr. Justice Mosley held that the reasons provided for regarding the decision to declare a public order emergency did not satisfy the requirements of the Emergencies Act and were therefore *ultra vires*.

57. Likewise, the Regulations violated section 2(b) of the *Charter* against the freedom of thought, belief, opinion and expression and the Economic Order violated section 8 of the *Charter* against unreasonable search and seizure. Neither the Regulations nor the Economic Order were saved by section 1 of the *Charter* in the Mosley Decision. Therefore, both the Regulations and Economic Order were ruled as being unconstitutional, and the implementation thereof was therefore unlawful.

Causes of Action

58. The Plaintiffs reserve their rights to further amend this Notice of Action or expand this claim when the Statement of Claim is filed in this action pursuant to rule 14.03(5) of the *Rules of Civil Procedure*, RRO 1990, Reg 194.

Negligence

59. The Plaintiffs plead that the Defendants, any or all of them:

- a. owed both private and public duties of care to the Plaintiffs or each of them arising from their roles as legislative bodies, financial institutions, police services, non-governmental organizations, public figures, municipalities or individuals as the case may be;
- b. breached their respective duties of care owed to the Plaintiffs by:
 - i. unlawfully and unreasonably disclosing personal information including financial information of the Plaintiffs;
 - ii. unlawfully and unreasonably seizing financial accounts, including bank and credit card accounts of the Plaintiffs;

- iii. unlawfully and unreasonably disseminating false information about the Plaintiffs with malicious intent to harm; and
 - iv. engaging in such further and other unlawful and unreasonable conduct as will be proven at the trial of this action;
- c. it was reasonably foreseeable that by engaging in the conduct enumerated in subparagraphs i – iv above the Defendants would cause harm to the Plaintiffs either directly or indirectly; and
- d. as a result of the Defendants’ breaches of their respective duties of care owed to the Plaintiffs, each and every Plaintiff suffered harm both directly and indirectly.

Misfeasance of Public Office

60. Through the Unlawful Enactments, the Crown Defendants, their agents, employees and servants owed public law duties to the Plaintiffs. The Crown Defendants were obligated to comply with the provisions of the Emergencies Act including the conditions precedent required for its invocation. Their unreasonable decision to invoke the Unlawful Enactments while knowingly failing to abide by the provisions required for the invocation of Emergencies Act was unlawful. This malicious conduct directed towards the Plaintiff’s constitutes misfeasance of public office.
61. The Crown Defendants failed in their public law duty to the Plaintiffs to act lawfully. Alternatively, their decision was motivated by an improper purpose or otherwise took into account irrelevant considerations or ignored relevant considerations and was unlawful.

62. The Crown Defendants' decision misinformed the public and resulted in the enactment of legislation of a draconian nature either negligently or deliberately to harm the Plaintiffs who were viewed by the Defendants as political opponents and was done for political reasons against Canadian citizens living in a free and democratic society. The Crown Defendants' conduct in misinforming the public is morally reprehensible, blameworthy, and unconscionable.
63. The Crown Defendants were aware that the Plaintiffs would likely suffer damages as a result of their actions and that such harm was reasonably foreseeable.
64. The deliberate and unlawful conduct of the Crown Defendants directly and indirectly caused the Plaintiffs damages, hardships, expenses, and loss both tangible and intangible.

Abuse of Process

65. The conduct of the Crown Defendants in invoking Unlawful Enactments compromised the integrity of the justice system in Canada and undermined judicial processes which would have otherwise been required in the absence of the invocation of the Emergencies Act.
66. Rather than proceeding with the Unlawful Enactments, the Crown Defendants ought to have used existing laws as required.

Interference with Economic Relations and Inducing Breach of Contract

67. As a further result of the Unlawful Enactments the Defendants interfered with the Plaintiffs' economic interests, contractual and business relations, and business relationships. The Unlawful Enactments frustrated and otherwise caused various

contracts between the Plaintiffs, their financial institutions, and other third parties to be breached thereby causing the Plaintiffs to suffer damages.

68. It was intended, or reasonably foreseeable that the Unlawful Enactments, and the resulting seizure and freezing of the Plaintiffs' financial products, private property, services, and information would frustrate the ability of the Plaintiffs to exercise their rights under their various contracts and cause the Plaintiffs to suffer damages.

Breach of Charter Rights

69. In the Mosley Decision, Justice Mosley confirmed that the Unlawful Enactments were in breach of the Plaintiffs Charter rights, specifically section 2(b) with respect to the Regulations and section 8 with respect to the Economic Order and neither were saved by section 1 of the Charter.
70. Pursuant to section 24(1) of the Charter, the Plaintiffs, all of whom were subject to the Unlawful Enactments, and several of whom suffered additional Charter breaches seek awards for damages flowing from the Defendants' breach of their Charter rights.

Trespass to Chattels and Conversion

71. The Defendants, by their conduct intentionally interfered with the Plaintiffs' possession of, and access to, monies in the unlawfully seized bank accounts.
72. The Defendants denied the Plaintiffs access to their financial services and private property, and accordingly are liable to the Plaintiffs for conversion and trespass to chattels as their actions constitute interference with the Plaintiffs' property without legal justification.

Injurious Falsehood and Defamation

73. Immediately preceding, during, and following the Unlawful Enactments, the Defendants, any or all of them, published false statements designed to lower the public opinion of anyone participating in the Ottawa Protests, including the Plaintiffs.
74. The CAHN Defendants in particular, provided false information to several other Defendants and media organizations designed to harm the Plaintiffs. Falsified information was supplied by the CAHN Defendants to the Crown Defendants and the Local Police Defendants in support of the Unlawful Enactments.
75. The statements provided by the CAHN Defendants reflected adversely on the Plaintiffs' interests and directly led to the invocation of the Unlawful Enactments.
76. The statements were false and were made with malice to advance the political agenda of the CAHN Defendants. The CAHN Defendants at one point were recipients of funding from the Crown Defendants.
77. The Plaintiffs, any or each of them, suffered damages as a result of the defamatory statements by the CAHN Defendants which were dishonest, deceitful, and exaggerated while done with malicious intent to cause harm.

Intrusion upon Seclusion

78. The Plaintiffs had a strong and reasonable expectation of privacy in their financial records as recognized by the court in the Mosley Decision.
79. The financial records disclosed by the Financial Institution Defendants are part of the biographical core of personal information which the Plaintiffs, and indeed any

individuals, in our free and democratic society wish to maintain and control from dissemination to the state.

80. The financial records unlawfully accessed pursuant to the Unlawful Enactments and seized by the Defendants included information which revealed personal details about the Plaintiffs.

81. By accessing these records unlawfully, the Financial Institution Defendants intentionally intruded upon the seclusion of the Plaintiffs' private affairs and concerns.

Assault and Battery

82. On various occasions following the Unlawful Enactments agents and officers of the RCMP, and the OPS committed assault and battery against some of the Plaintiffs. In particular:

a. Unidentified members of the RCMP and OPS:

- i. pepper sprayed individual Plaintiffs;
- ii. shot at the Plaintiffs;
- iii. tear gassed the Plaintiffs;
- iv. unlawfully entered into the trailer of an Indigenous Plaintiff while conducting a warrantless search and physically beat and assaulted this Plaintiff;
- v. trampled the Plaintiffs while riding on horseback;
- vi. punched, kicked and hit the Plaintiffs; and

- vii. committed such further and other unlawful acts which violated the person of any and each of the Plaintiffs as will be proven at the trial of this action;
- b. In committing said acts enumerated at subparagraphs i-vii above acted intentionally or negligently or with willful blindness or recklessness toward the Plaintiffs; and
- c. In committing assault and battery against the Plaintiffs they were acting unlawfully and without justification.

Harassment and Intimidation

83. On various occasions preceding, during and following the Unlawful Enactments the Defendants, any or each of them engaged in communications and threats, many of which were widely publicized and of a public nature, which caused the Plaintiffs to fear for their safety, and the safety of their loved ones. These communications included but were not limited to:
- a. Public statements from the Crown Defendants and OPS;
 - b. Statements and communications on social media; and
 - c. Stalking and other harassing behavior by members of the Crown Defendants and OPS.
84. The Defendants knew or ought to have known that these communications were unwelcome and could reasonably foresee that such communications and behaviours could reasonably cause emotional distress.

85. As a result of these behaviours, the Plaintiffs suffered emotional distress, feared for their wellbeing and otherwise suffered harm.
86. The threats and behaviours enumerated above in subparagraphs 83.a – c above were designed to coerce the Plaintiffs to refrain from exercising their constitutional rights. As a result of these threats and behaviours coupled with the Unlawful Enactments, the Plaintiffs suffered loss and damages and were prevented from exercising their free and democratic rights. As a result, the Defendants are liable in tort for their intimidation of the Plaintiffs.

Civil Conspiracy

87. The actions of the Defendants were taken together in concert with other Defendants. The Crown Defendants, Financial Institution Defendants, Police Defendants, CAHN Defendants, and individuals involved worked together to share information, disseminated misinformation about the Plaintiffs, enacted the Unlawful Enactments on unconstitutional pretenses and ultimately froze or otherwise seized the financial services, assets, and private property of the Plaintiffs in an unlawful manner.
88. Each of the Defendants ultimately assisted one another in their unlawful actions perpetrated against the Plaintiffs.
89. The Plaintiffs' injuries were consequences of the concerted actions of the Defendants working together in a way that directly caused the harm suffered.
90. The actions of the Defendants were unlawful, and the Defendants knew or ought to have known in the circumstances that their actions would likely cause injury to the Plaintiffs.

Breaches of Legislation

91. The Financial Institution Defendants, and the Banking Defendants in particular were bound by the express provisions of the *Bank Act*, SC 1991, c 46.

92. The Financial Institution Defendants, by

- a. unlawfully disclosing the information of the Plaintiffs;
- b. refusing to provide the Plaintiffs with access to their funds; and
- c. acting arbitrarily to identify the Plaintiffs for the purpose of freezing their accounts;

violated their lawful obligations owed to the Plaintiffs pursuant to the Bank Act.

Breaches of Contract

93. The Financial Institution Defendants, by engaging in the conduct described at paragraphs 91 and 92 above breached their contractual obligations owed to the Plaintiffs pursuant to their various contracts for financial products and services with the Financial Institution Defendants.

94. Further, the Financial Institution Defendants had a duty to perform their obligations under the contracts with the Plaintiffs in good faith. By their conduct the Financial Institution Defendants wholly failed to perform these obligations in good faith contrary to the fundamental principles of contract and their fundamental duties owed to the Plaintiffs.

95. The Financial Institution Defendants in addition to their breaches of contract breached their common law duties owed to the Plaintiffs.

Damages

96. The conduct of the Defendants toward each and every Plaintiff in these circumstances included several torts, breaches of fundamental rights and freedoms, and wanton disregard for the wellbeing of the individual Plaintiffs. The conduct was unlawful, reprehensible, was politically motivated and charged which included large-scale attempts to intimidate, denigrate, and otherwise disparage and discourage the Plaintiffs.
97. The Plaintiffs were unlawfully targeted unconstitutionally and had their Charter rights violated without due process or procedure and suffered harm as a result.
98. This is an exceptional case wherein the conduct of the Defendants, any or all of them, was malicious, high-handed, and reprehensible misconduct that offends the Court's sense of decency and a substantial punitive damages award is warranted in these circumstances to dissuade such future conduct.
99. Given the location of the Defendants and the clear nexus this action has to the Ottawa Protests and the Unlawful Enactments, Ontario is the proper jurisdiction and forum for this action to be heard in.

Date: February 14, 2024

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Solicitors for the Plaintiffs

EDWARD CORNELL et al. - and -

JUSTIN TRUDEAU et al.

Plaintiffs

Defendants

**ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED IN OTTAWA**

NOTICE OF ACTION

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Solicitors for the Plaintiffs



Court File No.: CV-24-00094733-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

EDWARD CORNELL, VINCENT GIRCYS, LINDSAY MILNER, SHAUN ZIMMER, ANDREW MILLER, JONKER TRUCKING INC., ANDREW FERA, WAYNE NARVEY, CLAYTON MCALLISTER, KATHLEEN MARKO, NICOLA FORTIN, ARIELLE FORTIN, THOMAS QUIGGIN, TIMOTHY TIESSEN, O'JAY LAIDLEY, ERIC BUECKERT, PETER TERRANOVA, NANCY TERRANOVA, RICHARD OCELAK, and KERRI-ANN HAINES

Plaintiffs

- and -

JUSTIN TRUDEAU, CHRYSTIA FREELAND, DAVID LAMETTI, DOMINIC LEBLANC, BILL BLAIR, MARCO MENDICINO, ATTORNEY GENERAL OF CANADA, JODY THOMAS, ROYAL CANADIAN MOUNTED POLICE, DENIS BEAUDOIN, BRENDA LUCKI, STEVE BELL, ROBERT BERNIER, OTTAWA POLICE SERVICES BOARD, OTTAWA POLICE SERVICE, THE TORONTO-DOMINION BANK, CANADIAN IMPERIAL BANK OF COMMERCE, BANK OF MONTREAL, NATIONAL BANK OF CANADA, ROYAL BANK OF CANADA, BANK OF NOVA SCOTIA (SCOTIABANK), CANADIAN TIRE SERVICES LTD. doing business as CANADIAN TIRE BANK, MERIDIAN CREDIT UNION, ASSINIBOINE CREDIT UNION, GULF & FRASER CREDIT UNION, STRIDE CREDIT UNION, SIMPLII FINANCIAL, CANADIAN ANTI-HATE NETWORK, BERNIE FARBER, JOHN DOE, and ABC CORP.

Defendants

STATEMENT OF CLAIM

Notice of Action issued on February 14, 2024

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff and file it, with proof of service in this court office, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date:

Issued by:

Local Registrar

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Ottawa, Ontario K2P 2K1

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Ottawa, Ontario K1G 6H5
- TO: ROBERT BERNIER**
Ottawa Police Service
Stn T; PO Box 9634
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- TO: OTTAWA POLICE SERVICES BOARD**
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RCMP National Headquarters
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TO: THE TORONTO-DOMINION BANK
66 Wellington Street West
Toronto, Ontario M5K 1A2

TO: CANADIAN IMPERIAL BANK OF COMMERCE
81 Bay St.
Toronto, Ontario M5J 1E6

TO: SIMPLII FINANCIAL
595 Bay St, Fl 6
Toronto, Ontario, M5G 2C2

TO: BANK OF MONTREAL
100 King Street West
1 First Canadian Place, 9th Floor
Toronto, Ontario M5X 1A1

TO: NATIONAL BANK OF CANADA

800 Saint-Jacques Street
Montreal, Quebec H3C 1A3

TO: ROYAL BANK OF CANADA
200 Bay Street, South Tower
Toronto, Ontario M5J 2J5

TO: BANK OF NOVA SCOTIA (SCOTIABANK)
Scotiabank Head Office
44 King St West
Toronto, Ontario M5H 1H1

TO: MERIDIAN CREDIT UNION
Meridian Credit Union Corporate Office
3280 Bloor Street West, Centre Tower, 7th Floor
Toronto, Ontario M8X 2X3

TO: ASSINIBOINE CREDIT UNION
200 Main St., 6th Floor
Winnipeg, Manitoba R3C 1A8

TO: GULF & FRASER CREDIT UNION
Suite 401 - 7300 Edmonds Street
Burnaby, British Columbia V3N 0G8

TO: STRIDE CREDIT UNION
Stride Credit Union Corporate Office
19 Royal Road N
Portage La Prairie, Manitoba R1N 1T9

TO: CANADIAN ANTI-HATE NETWORK
439 University Ave
Toronto, Ontario M5G 1Y8

TO: CANADIAN TIRE SERVICES LTD., doing business as CANADIAN TIRE BANK
Canadian Tire Head Office
Corporate Home Office
2180 Yonge Street
Toronto, Ontario M4P 2V8

CLAIM

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A. Relief Claimed

1. The Plaintiffs are Canadian individuals and Canadian businesses who were subjected to the unreasonable use of the *Emergencies Act*, RSC 1985, c 22 (4th Supp) (the “*Emergencies Act*”) and claim against the Defendants, jointly and/or severally, for:
 - a. A declaration that the Crown Defendants, as defined herein below, acted unlawfully when they issued Order in Council P.C. 2022-106, the *Proclamation Declaring a Public Order Emergency*, SOR/2022-20 (the “**Proclamation**”); Order in Council P.C. 2022-107, the Emergency Measures Regulations, SOR/2022-21 (the “**Regulations**”); and Order in Council P.C. 2022-108, the Emergency Economic Measures Order, SOR/2022-22, (the “**Economic Order**”) (collectively hereinafter referred to as the “**Unlawful Enactments**”);

- b. A declaration that the Defendants acted unlawfully and in breach of section 8 of the *Canadian Charter of Rights Freedoms* – Part I of the *Constitution Act*, 1982 adopted as Schedule B to the *Canada Act 1982*, 1982, c. 11 (U.K.) (the “*Charter*”) when they seized, froze, or otherwise interfered with the financial services, private property, products, and information of the Plaintiffs;
- c. A declaration that the Defendants acted unlawfully and in breach of section 2(b) of the *Charter* with regards to the unconstitutional Regulations;
- d. A declaration that the Financial Institution Defendants as defined herein below, acted in breach of legislation, contract, and common law when they seized, froze, or otherwise interfered with the financial services, private property, products, and information of the Plaintiffs;
- e. A declaration that the Defendants acted in panic, political spite, and with the intention of punishing and intimidating citizens of Canada;
- f. An Order that the individual Defendants named herein are to be held personally liable to pay for the damages and costs pleaded herein and that the citizens of Canada not be required to pay for the wrongdoing of the named individual Defendants as may be allowed;
- g. General and special damages in the amount \$500,000 for each Plaintiff for negligence, breach of contract, unlawful interference, misfeasance of public office, trespass to chattels, civil conspiracy, and abuse of process for the unlawful seizure of bank accounts by the Defendants;

- h. General and special damages in the amount \$100,000 for each Plaintiff for injurious falsehoods and defamation resulting from the conduct of the Defendants;
- i. General and special damages in the amount of \$100,000 for each Plaintiff for negligence, assault, battery, harassment, and intimidation perpetrated by the Defendants against the Plaintiffs;
- j. General and special damages pursuant to section 24(1) of the *Charter* in the amount of \$500,000 for each Plaintiff for the Defendants' unjustified breach of the Plaintiffs' *Charter* rights;
- k. Punitive, exemplary and/or aggravated damages in the amount of \$1,000,000 for each Plaintiff considering the malicious, reprehensible, and high-handed misconduct of the Defendants;
- l. Prejudgment and post judgment interest in accordance with the *Courts of Justice Act*, RSO 1990 c.C.43;
- m. Costs of this action (legal fees and disbursements) on solicitor and own client basis or otherwise on a substantial indemnity basis plus applicable harmonized sales tax in accordance with the *Excise Tax Act*, RSC, 1985, c. E-15 and the *Courts of Justice Act*, RSO 1990 c.C.43; and
- n. Such further and other relief as this Honourable Court deems just.

B. Overview

- 2. On February 14, 2022, the *Emergencies Act* was invoked which ultimately resulted in searches and seizures of the bank accounts of many Canadians including the

- Plaintiffs. The invocation was held by the Federal Court to be unreasonable, and *ultra vires*, while the Regulations and Economic Order were unconstitutional and in breach of section 2(b) and section 8 of the *Charter* respectively.
3. The Plaintiffs are comprised of Canadians from all walks of life, including businesses, Indigenous peoples, senior citizens, retired police officers, decorated military veterans, racialized minorities, minors, single mothers, and people with disabilities who were all deprived of their *Charter* rights and suffered damages as a result of the *Unlawful Enactments*.
 4. The events in the within action constitutes of one of the largest and most egregious collective breaches of *Charter* rights in the history of Canada. The scope of the unlawful searches and seizures was astonishingly broad, disproportionate, ill-conceived, and contrary to the core constitutional values of all Canadians in our free and democratic society.
 5. This action provides an important opportunity for this Court to vindicate the *Charter* rights of the Plaintiffs and in so doing promote the important constitutional and legal principles which ought to be safeguarded such as this Court's commitment to the rule of law and the principles of fundamental justice. This action further provides an important opportunity for this Court to deter future governments from improperly enacting draconian measures without justification for political means by providing an award of compensable damages to the Plaintiffs.

C. The Defendants

Federal Crown Defendants

6. The Defendant the Attorney General (Canada) (“**Canada**”) is the representative of His Majesty the King in Right of Canada (the “**Crown**”) and is named in these proceedings pursuant to section 23(1) of the *Crown Liability and Proceedings Act*, RSC 1985, c C-50 (the “**CLPA**”).
7. The Crown as represented by Canada pursuant to s. 3(b) of the CLPA is responsible at law for any tort committed by any servant of the Crown, including, any and all servants of the Crown who unlawfully committed torts against the Plaintiffs and are named as Defendants in this action, namely:
 - a. The Royal Canadian Mounted Police (“**RCMP**”) pursuant to section 36 of the CLPA;
 - b. Mr. Denis Beaudoin, Director of Financial Crime for the RCMP;
 - c. Ms. Brenda Lucki, Commissioner of the RCMP (as she was then);
 - d. The Prime Minister of Canada, The Right Honourable Justin Trudeau;
 - e. The Deputy Prime Minister, the Honourable Chrystia Freeland;
 - f. The Minister of Public Safety, the Honourable Marco Mendicino (as he was then);
 - g. The Minister of Justice, the Honourable David Lametti (as he was then);
 - h. The Minister of Emergency Preparedness, the Honourable Bill Blair;
 - i. The Minister of Intergovernmental Affairs the Honourable Dominic LeBlanc; and

j. Ms. Jody Thomas, National Security and Intelligence Advisor.

(Collectively, the Crown and its servants above, as represented by Canada shall be referred to as the “**Crown Defendants**”).

Financial Institutions

8. The Defendant financial institutions identified individuals, provided financial information, interfered with private property, and seized financial products, information and services of the Plaintiffs including but not limited to their bank accounts and credit cards.
9. The Toronto-Dominion Bank (“**TD**”) is a Canadian financial institution, headquartered in Toronto, Ontario.
10. The Canadian Imperial Bank of Commerce (“**CIBC**”) and their electronic division Simplii Financial (“**Simplii**”) is a Canadian financial institution, headquartered in Toronto, Ontario.
11. Bank of Nova Scotia (“**ScotiaBank**”) is a Canadian financial institution headquartered in Toronto, Ontario.
12. The Bank of Montreal (“**BMO**”) is a Canadian financial institution headquartered in Toronto, Ontario.
13. The National Bank of Canada (“**National Bank**”) is a Canadian financial institution headquartered in Montreal, Quebec.
14. The Royal Bank of Canada (“**RBC**”) is a Canadian financial institution headquartered in Toronto, Ontario.

15. Canadian Tire Services Ltd., doing business as Canadian Tire Bank (“**Canadian Tire**”) is a Canadian financial institution headquartered in Toronto, Ontario.

(collectively, the above banking institutions will be hereinafter referred to as the “**Bank Defendants**”)
16. The Meridian Credit Union (“**Meridian**”) is a cooperative credit union headquartered in Toronto, Ontario.
17. Assiniboine Credit Union (“**Assiniboine**”) is a cooperative credit union headquartered in Winnipeg, Manitoba.
18. Gulf & Fraser Credit Union (“**Gulf & Fraser**”) is a cooperative credit union headquartered in Burnaby, British Columbia.
19. Stride Credit Union (“**Stride**”) is a cooperative credit union headquartered in Portage la Prairie, Manitoba

(Collectively, the cooperative credit union Defendants above will be hereinafter referred to as the “**Credit Union Defendants**”)
20. Collectively, all of the Bank Defendants and the Credit Union Defendants shall be hereinafter referred to as the “**Financial Institution Defendants**”.

Localized Police Organizations

21. The Defendant, Ottawa Police Services Board (the “**OPSB**”) is the representative of members of the Ottawa Police Service and is named in these proceedings pursuant to section 50(1) of the *Police Services Act*, RSO 1990, c P.15.
22. The Defendant, Ottawa Police Service (“**OPS**”) is the municipal police force headquartered in Ottawa, Ontario.

23. The Defendant, Steve Bell (“**Chief Bell**”) is an individual residing in Ottawa, Ontario and was the Deputy Chief of Police for the OPS and later Interim Chief of Police for the OPS at the relevant time of this action. The OPS is named as a representative of Chief Bell in his capacity as member of the OPS in these proceedings.
24. The Defendant, superintendent Robert Bernier (“**Bernier**”) is a member of OPS and an individual residing in Ottawa, Ontario and was overall Event Commander for the Integrated Public Order Unit operation at the relevant time of this action.
25. For posterity, the RCMP, OPS, and potentially other unknown police organizations or entities to be added at a future date to this claim when their identities become known may hereinafter be collectively referred to as the “**Police Defendants**”.

Non-Profit Organizations

26. The Defendant, the Canadian Anti-Hate Network (“**CAHN**”) is an independent, nonprofit organization headquartered in Toronto, Ontario.
27. The Defendant, Bernie Farber (“**Mr. Farber**”), is an individual and the founding chair emeritus of CAHN.

(collectively, the CAHN and Mr. Farber, are hereinafter referred to as the “**CAHN Defendants**”).

John Doe Defendants

28. Several unidentified individuals committed torts against the Plaintiffs before, during, and after the Unlawful Enactments. These include but are not limited to members of the Police Defendants involved in the enforcement of the Unlawful Enactments and members and servants of the Crown.

29. The Plaintiffs reserve all their rights to bring suit against these unnamed and yet unknown Defendants when their identities become knowable through discovery.

ABC Corp. Defendants

30. It may be discovered during the course of this action that additional entities, both public or private, committed torts against the Plaintiffs. The Plaintiffs reserve all their rights to bring suit against these unnamed and yet unknown Defendants.

D. The Plaintiffs

31. All of the Plaintiffs are either individuals or businesses who had their financial accounts and private property including banking and credit cards, cryptocurrency, and other financial instruments frozen and unlawfully searched and seized following the Unlawful Enactments in February of 2022.

32. Many of the Plaintiffs were also injured by the tortious conduct of any or all of the Defendants to this action preceding, during, and following the Unlawful Enactments. Some of the Plaintiffs are suffering continuing damages.

33. Importantly, not all of the Plaintiffs participated in the Ottawa Protests as defined herein below, or even supported the Ottawa Protests. Some individual Plaintiffs were the victims of the Unlawful Enactments as joint account holders despite never having stepped foot in Ottawa during the Ottawa Protests. Furthermore, at least two of the Plaintiffs had their bank account frozen despite opposing the Ottawa Protests.

Vincent Gircys

34. The Plaintiff, Vincent Gircys (“**Mr. Gircys**”), is an individual resident in Fronthill, Ontario. Mr. Gircys is a retired member of the Ontario Provincial Police.

35. Mr. Gircys was present in Ottawa and attended the Ottawa Protests on or around January 29, 2022 to January 30, 2022 and February 4, 2022, to February 27, 2022.
36. Following the Unlawful Enactments, Mr. Gircys experienced hostility and aggression from the Police Defendants, and was threatened with arrest if he entered what the Police Defendants referred to as the 'red zone'.
37. Mr. Gircys attempted to donate money to the Ottawa Protests by way of GiveSendGo, but the funds were refunded to him.

Frozen Gircys Accounts

38. Mr. Gircys is a customer of the following Financial Institution Defendants:
 - a. CIBC, where he holds a credit card and debit card;
 - b. Simplii, where he holds a chequing and savings accounts jointly with his wife; and
 - c. President's Choice, where he holds a PC Mastercard.

(collectively hereinafter referred to as the "**Gircys Accounts**").
39. On or around February 19, 2022, Mr. Gircys learned that the Gircys Accounts had been frozen as a result of the Unlawful Enactments through a phone call (the "**February 19 Phone Call**") that he had with an individual from CIBC and Simplii. The individual stated that it was not CIBC or Simplii's doing and that the request to freeze his bank account came from the RCMP. Mr. Gircys was further informed that his bank account would not be unfrozen until the Unlawful Enactments were over or until the RCMP would allow his account to be unfrozen.
40. Prior to the February 19 Phone Call, Mr. Gircys had received a voicemail from CIBC stating to call him back and that there was a problem with his account.

41. The Gircys Accounts were frozen from around February 19, 2022 to February 23, 2022.
42. During this time, Mr. Gircys was unable to access, withdraw, or otherwise use the funds he deposited or had available in the Gircys Accounts.
43. On or around February 23, 2022, Mr. Gircys spoke again with an individual from CIBC who claimed that the RCMP requested his accounts with CIBC and Simplii be unfrozen and she was giving him notice to that effect.

Andrew Miller

44. The Plaintiff, Andrew Miller (“**Mr. Miller**”), is an individual resident in Annan, Ontario. At the relevant and material time of this action, Mr. Miller was a carpenter.
45. Mr. Miller attended the Ottawa Protests from January 31, 2022 to February 2, 2022 and again from February 11, 2022, to February 13, 2022.
46. During the Ottawa Protests, Mr. Miller made cash donations to truckers on Parliament Hill, made cash donations to others providing logistical support, and donated diesel fuel to the truckers present at the Ottawa Protests.

Frozen Miller Accounts

47. At the relevant time, Mr. Miller was a customer of National Bank and Meridian Credit Union. Mr. Miller also had a pre-paid credit card which held \$10,000 in prepaid funds (collectively hereinafter referred to as the “**Miller Accounts**”).
48. On or around sometime after February 15, 2022, as a result of the Unlawful Enactments, Mr. Miller discovered the Miller Accounts had been frozen when attempting to use funds from his pre-paid credit card.

49. The Miller Accounts were not unfrozen following the termination of the Unlawful Enactments.
50. Mr. Miller's prepaid credit card remained frozen and inaccessible for a period of approximately 4 months following the Unlawful Enactments.
51. Since the Unlawful Enactments, Mr. Miller has had difficulty opening and maintaining a bank account with any Canadian banking institutions.

Police Brutality Towards Mr. Miller

52. While attending the Ottawa Protests, Mr. Miller was assaulted and battered by an unidentified member of the Police Defendants.
53. During a peaceful protest, Mr. Miller was further grabbed and threatened by a member of the Police Defendants whose individual identity is unknown at this time.

O'Jay Laidley

54. The Plaintiff, O'Jay Laidley ("**Mr. Laidley**"), is an individual resident in Brantford, Ontario. Mr. Laidley is an owner/operator transport driver.
55. Mr. Laidley attended the Ottawa Protests from January 28, 2022, to February 19, 2022. During the Ottawa Protests Mr. Laidley did not make any donations.

Frozen Laidley Accounts

56. Mr. Laidley was a customer of ScotiaBank and held various chequing and savings accounts with ScotiaBank including jointly held accounts with his wife and children (collectively hereinafter referred to as the "**Laidley Accounts**").
57. On or around February 18, 2022, Mr. Laidley discovered the Laidley Accounts had been frozen when attempting to use funds from his chequing account and credit card.

58. ScotiaBank refused to provide Mr. Laidley with any information regarding the freezing of his accounts.
59. Several days passed and Mr. Laidley was contacted by the RCMP who confirmed that his accounts had been frozen pursuant to the Unlawful Enactments.
60. The Laidley Accounts were frozen for approximately 10 days during which time Mr. Laidley missed several important bill payments including his car payment.
61. The Laidley Accounts being frozen not only detrimentally impacted his life including his credit score, it also further caused harm to his wife and children who were joint account holders as they were unable to access funds as well during this time.

Police Brutality Towards Mr. Laidley

62. On or around February 19, 2022, Mr. Laidley, was assaulted and battered when he was tear gassed (the “**Tear Gas Attack**”) by certain unidentifiable members of the Police Defendants. The tear gas caused Mr. Laidley to experience intense burning pain which lasted in his throat for several days following the Tear Gas Attack. During the Tear Gas Attack, Mr. Laidley feared for his life and safety.
63. Mr. Laidley was assaulted and battered for exercising his constitutional rights to protest and express himself. This assault and battery occurred under the auspices of the Unlawful Enactments.

Lindsay Milner

64. The Plaintiff, Lindsay Milner (“**Ms. Milner**”), is an individual resident in Oshawa, Ontario. Ms. Milner works as a restaurant manager.

65. At the relevant and material time of this action, Ms. Milner was employed by the Durham District School Board, but was on medical leave.
66. Ms. Milner attended the Ottawa Protests from around February 4, 2022, to February 22, 2022. During the Ottawa Protests, Ms. Milner lived out of her car in Ottawa.
67. Ms. Milner did not make monetary contributions to the Ottawa Protests.
68. Prior to the invocation of the Unlawful Enactments, Ms. Milner experienced a culture of inclusion, appreciation, and peace amongst those attending or otherwise connected with the Ottawa Protests, including the residents of Ottawa and the Police Defendants.
69. Following the invocation of the Unlawful Enactments, Ms. Milner witnessed a stark change from cordial and peaceful interactions to displays of hatred, aggression, provocation and other disturbing and fear-inducing behaviour by the Police Defendants towards the attendees of the Ottawa Protests.

Frozen Milner Accounts

70. Ms. Milner is a customer of TD, where she holds chequing and savings accounts (collectively, the “**Milner Accounts**”).
71. On or around February 18, 2022, Ms. Milner attempted to use her debit card connected to the Milner Accounts, but was unable to do so as her card was declined despite funds being present in the Milner Accounts.
72. Sometime around or between February 18, 2022 to February 22, 2022, Ms. Milner conclusively determined the Milner Accounts were frozen as a result of the Unlawful

Enactments after a phone call with TD wherein she was told the Milner Accounts were frozen by order of the RCMP.

73. The Milner Accounts remained frozen as a result of the Unlawful Enactments for approximately 5-10 days following February 18, 2022.
74. During this time, Ms. Milner was unable to access, withdraw, or otherwise use the funds she deposited in the Milner Accounts.
75. As a result of the Unlawful Enactments and TD freezing the Milner Accounts, Ms. Milner was left in Ottawa with no access to funds and therefore no way to return home or obtain necessities for herself.
76. Ms. Milner was only able to safely care for herself and travel back home through the generosity of her fellow Canadians, including her mother who located Ms. Milner and provided her with cash to travel home.

Police Brutality Towards Ms. Milner

77. On or around February 18, 2022, Ms. Milner, along with others, walked near the Tomb of the Unknown Soldier where there was a heavy presence from the Police Defendants, including a group of unidentified and badge-less law enforcement officers outfitted in green suits (the “**Green Police Defendants**”), whose identity and affiliation are unknown to Ms. Milner.
78. Prior to walking near the line of Green Police Defendants, Ms. Milner and her friend fashioned white flags out of extra t-shirts to display and communicate that they posed no threat.

79. As Ms. Milner approached the line of Green Police Defendants and other Police Defendants, things were peaceful. However, this changed quickly when the Police Defendants and Green Police Defendants, whose identity at this time is unknown to Ms. Milner, trampled members of the public including Ms. Milner's friend on horseback.
80. When the horses came through, Ms. Milner felt immense fear and terror for the lives and safety of herself and others as she listened to her fellow Canadians screaming and crying as they were beaten by the Police Defendants and Green Police Defendants.
81. Ms. Milner continued to fear for her life and safety during the chaos created by the Police Defendants and Green Police Defendants.
82. Ms. Milner approached a group of nine or ten officers of the Police Defendants who were standing off to the side to request assistance and/or intervention. Despite her pleas for help, none of the officers attempted to assist her.
83. Ms. Milner later helped render aid to her friend who was trampled on horseback and battered by the Police Defendants and Green Police Defendants.
84. On or around February 19 or 20, 2022, Ms. Milner attended a line in the O'Connor area. Again, upon arrival, the crowd was peaceful, and the Green Police Defendants were present.
85. Ms. Milner and the other individuals present collectively sang "O Canada" in a display of unity, peace, love, and patriotism.

86. Following the singing of “O Canada”, the Green Police Defendants again escalated the situation to violence, using tear gas, and rubber bullets against those in attendance despite it being an entirely peaceful gathering. Ms. Milner was assaulted and battered when she was tear gassed during this incident.
87. The Police Defendants and Green Police Defendants further made repeated threats to use a weapon that would produce a loud and damaging sound against the individuals in attendance, presumably in reference to a Long-Range Acoustic Device or sound cannon.
88. Again, as she observed these occurrences, Ms. Milner feared for her life and safety as she watched her fellow Canadians be violently attacked by the Police Defendants and Green Police Defendants, not knowing what action they would take against her.
89. Ms. Milner left the area alone, afraid, and distrusting of the Police Defendants and Green Police Defendants.

Milner Visits TD Upon Return Home

90. When Ms. Milner returned home, she had a telephone conversation with an individual from TD who informed her that the RCMP made the orders to freeze her bank accounts.
91. Further, when Ms. Milner made a physical visit to TD shortly after her return home from the Ottawa Protests, she was told by the branch manager that while TD is a bank, they are “actually run by the government”.

Clayton McAllister

92. The Plaintiff, Clayton McAllister (“**Mr. McAllister**”), is an individual resident in Dorchester, Ontario. At the relevant and material time of this action, Mr. McAllister was self-employed as an ice-road trucker and handyman.

93. Mr. McAllister attended the Ottawa Protests from around January 27, 2022, to February 21, 2022.

94. During the Ottawa Protests, Mr. McAllister donated food and supplies to the protests.

Frozen McAllister Accounts

95. Mr. McAllister is a customer of TD and BMO, where he holds various chequing and savings accounts (collectively hereinafter referred to as the “**McAllister Accounts**”). The McAllister Accounts include a joint bank account that Mr. McAllister used to operate his family farming business.

96. Sometime on or before February 18, 2022, out of concern regarding the Unlawful Enactments, Mr. McAllister called BMO and TD to confirm that the McAllister Accounts would not be frozen. Mr. McAllister was informed that his accounts would not be frozen during this call.

97. Despite this assurance, on or around February 18, 2022, Mr. McAllister attempted to deposit an electronic funds transfer connected to the McAllister Accounts, but was unable to do so.

98. Sometime around or between February 18, 2022 to February 21, 2022, Mr. McAllister conclusively determined the McAllister Accounts were frozen.

99. The McAllister Accounts remained frozen for a period of approximately 3 – 5 days. During this time Mr. McAllister missed several important payments as a result of the frozen accounts. In particular, Mr. McAllister, missed his mortgage payment, gym payment, and truck payment.

Police Brutality Towards Mr. McAllister

100. Sometime on or around February 18, 2022, following the Unlawful Enactments, Mr. McAllister was arrested by unidentified members of the Police Defendants.
101. During the arrest the Police Defendants removed Mr. McAllister's gloves, despite the weather being well below freezing that day. The Police Defendants also seized the keys to his truck which was Mr. McAllister's only mode of transportation.
102. Immediately following his arrest, the Police Defendants left Mr. McAllister in a paddy wagon for 6-8 hours without the availability of food or any bathroom facility.
103. Eventually, Mr. McAllister was dropped off at a gas station by the Police Defendants on the outskirts of Ottawa. As a result of the Police Defendants' removal of his gloves despite the freezing temperatures, Mr. McAllister suffered injuries to his hands.
104. On or around February 21, 2022, while watching television coverage of the Ottawa Protests, Mr. McAllister watched unidentified members of the Police Defendants walk past his vehicle and smash the windows.
105. Mr. McAllister was assaulted and battered for exercising his constitutional rights to free expression along with having the McAllister Accounts frozen and his personal property damaged.

Thomas Quiggin

106. The Plaintiff, Thomas Quiggin (“**Mr. Quiggin**”), is an individual resident in Ottawa, Ontario. At the relevant and material time of this action, Mr. Quiggin was a researcher. Mr. Quiggin has previously been employed in the Privy Council Office as well as employed as an RCMP intelligence officer.
107. Mr. Quiggin has been deployed on military duties in Bosnia and Yugoslavia, including one tour for the Privy Council Office overseas.
108. Furthermore, Mr. Quiggin has been employed in central banking including for the Bank of Canada.
109. Mr. Quiggin’s lengthy career in intelligence, central banking, government, military, and policing has also included national security service by working for Integrated National Security Enforcement Teams led by the RCMP.
110. Mr. Quiggin has been a qualified expert in the Federal Court on matters of national security and in the Ontario Superior Court of Justice as a national security and terrorism expert.
111. Mr. Quiggin attended the Ottawa Protests from around January 27, 2022, to February 21, 2022. During the Ottawa Protests Mr. Quiggin authored a report entitled “daily intelligence reports for the Convoy”.
112. On or around January 19, 2022, Mr. Quiggin donated \$50 to the protestors through GoFundMe.

Frozen Quiggin Accounts

113. Mr. Quiggin is a customer of Stripe and owned a CapitalOne Mastercard, (collectively hereinafter referred to as the “**Quiggin Accounts**”). The Quiggin Accounts were used for expenses and to process payments for Mr. Quiggin related to online sales.

114. Sometime on or around February 18, 2022, following the Unlawful Enactments, Mr. Quiggin discovered that the Quiggin Accounts were frozen when he received an email from Stripe which stated that his Stripe account had been frozen in accordance with Unlawful Enactments. Following receipt of this email Mr. Quiggin determined that his credit card was also frozen.

115. The Quiggin Accounts remained frozen for the duration of the Unlawful Enactments.

Peter Terranova and Nancy Terranova

116. The Plaintiff, Peter Terranova (“**Mr. Terranova**”), is an individual resident in Bright, Ontario and a retired crane operator. The Plaintiff, Nancy Terranova (“**Mrs. Terranova**”), is an individual resident in Bright, Ontario and the wife of Mr. Terranova (collectively, Mr. and Mrs. Terranova are hereinafter referred to as the “**Terranovas**”)

117. Mr. Terranova attended the Ottawa Protests from January 28, 2022, until February 18, 2022.

118. During the Ottawa Protests, Mr. Terranova made cash donations in support of the Ottawa Protest.

Frozen Terranova Accounts

119. The Terranovas are customers of TD and Canadian Tire Mastercard. They hold chequing, savings, and registered retirement accounts with TD and a credit card with Canadian Tire (collectively, hereinafter referred to as the “**Terranova Accounts**”).

120. The Terranovas discovered the Terranova Accounts were frozen on or around February 18, 2022, when Mrs. Terranova attempted to use the Canadian Tire MasterCard credit card and was declined. Mrs. Terranova then attended TD to withdraw funds and TD refused to let her view her accounts or make any withdrawals.

121. The Terranova Accounts were frozen for approximately one week.

Richard Ocelak and Kerri-Ann Haines

122. The Plaintiff, Richard Ocelak (“**Mr. Ocelak**”), is an individual resident in Scotland, Ontario. The Plaintiff, Kerri-Ann Haines (“**Ms. Haines**”), is an individual resident in Scotland, Ontario and the wife of Mr. Ocelak.

123. Mr. Ocelak attended the Ottawa Protests from January 28, 2022 until February 16, 2022. Mr. Ocelak did not make any donations in support of the Ottawa Protest.

Frozen Ocelak Accounts

124. Mr. Ocelak is a customer of TD and Simplii, he held chequing and savings accounts with TD jointly with his parents. Mr. Ocelak and Ms. Haines jointly held chequing and savings accounts with Simplii (collectively, hereinafter referred to as the “**Ocelak Accounts**”).

125. On or around February 18, 2022, Mr. Ocelak tried to e-transfer funds to a co-worker and the e-transfer would not process. Mr. Ocelak checked the balance of funds in his account and the account showed a zero balance.

126. Mr. Ocelak called TD and Simplii after learning the Ocelak Accounts had been frozen. Neither TD, nor Simplii told Mr. Ocelak that the Ocelak Accounts had been frozen pursuant to the Unlawful Enactments.
127. The Ocelak Accounts were frozen from February 18, 2022 until February 22, 2022.
128. Between February 18, 2022 and February 22, 2022, Mr. Ocelak's family members, including his parents, could not access their money as a result of the freezing.
129. The joint accounts held between Mr. Ocelak and his parents were the only means of accessing money for his parents. Mr. Ocelak's role in his parents' account is to assist them in their old age as required. Mr. Ocelak has a Power of Attorney for property with his father. During the time these joint accounts were frozen neither of Mr. Ocelak's parents had any access to funds to provide for themselves.

Jonker Trucking Inc.

130. The Plaintiff, Jonker Trucking Inc. ("**Jonker Trucking**"), is a corporation duly incorporated pursuant to the laws of Ontario and carrying on business in Caistor Centre, Ontario.
131. Several employees of Jonker Trucking attended the Ottawa Protests from January 28, 2022, until February 20, 2022. As part of the Ottawa Protests twelve (12) transport trucks from Jonker Trucking were present.

Frozen Jonker Trucking Licenses and Account

132. Jonker Trucking requires a commercial vehicle operating license to operate their transport trucks (the "**CVOR**"). Following the Unlawful Enactments between February 19, 2022, and February 26, 2022, Jonker Trucking's CVOR was suspended.

133. Jonker Trucking holds a business banking account at National Bank (the “**Jonker Trucking Account**”). On or about February 18, 2022, for a period of at least one day the Jonker Trucking Account was frozen.

134. While the Jonker Trucking Account was frozen Jonker Trucking missed payments owed to its fuel provider which harmed their contractual relations and interfered with their business relationships.

Edward Cornell

135. The Plaintiff, Edward Cornell (“**Mr. Cornell**”), is an individual resident in Shediac Cape, New Brunswick. Mr. Cornell is a retired member of the Canadian Armed Forces who achieved the rank of Warrant Officer and received a Medal of Bravery in recognition of an act of bravery during active duty.

136. Mr. Cornell served as an auxiliary police officer with the Ontario Provincial Police from 2013 to 2015.

137. Mr. Cornell attended the Ottawa Protests on January 29, 2022 and from February 2, 2022 until February 21, 2022.

Frozen Cornell Accounts

138. Mr. Cornell is a customer of ScotiaBank, where he holds chequing and savings accounts as well as two credit cards (collectively hereinafter referred to as the “**Cornell Accounts**”).

139. On or around February 18, 2022, Mr. Cornell learned the Cornell Accounts were frozen when he attempted to withdraw cash from an ATM, but was unable to, despite the Cornell Accounts having funds in them.

140. The Cornell Accounts remained frozen as a result of the Unlawful Enactments until on or around February 22, 2022.

141. During this time, Mr. Cornell was unable to access, withdraw, or otherwise use the funds he deposited in the Cornell Accounts.

Shaun Zimmer

142. The Plaintiff, Shaun Zimmer (“**Mr. Zimmer**”), is an individual resident in Winnipeg, Manitoba and is self-employed as an addictions coach.

143. Mr. Zimmer attended the Ottawa Protests from February 1, 2022, until February 21, 2022. Mr. Zimmer provided donations directly to protestors and transferred funds to the families of some protestors during the Ottawa Protests.

Frozen Zimmer Account

144. Mr. Zimmer is a customer of Assiniboine where he holds a bank account (the “**Zimmer Account**”).

145. On or around February 18, 2022, Mr. Zimmer discovered the Zimmer Account had been frozen when he attempted to make purchases and withdrawals or send electronic funds transfers.

146. The Zimmer Account was not u. Instead, the Account remained frozen until Assiniboine Credit Union terminated the Zimmer Account on or about April 29, 2022.

147. As a result of the frozen Zimmer Account, Mr. Zimmer was unable to pay important obligations including but not limited to his mortgage payments, cell phone bills, utility bills, and child support payments.

148. For a period of time following the frozen Zimmer Account, Mr. Zimmer was unable to purchase basic necessities such as food for himself and his family.
149. To date, Mr. Zimmer remains behind on several of his bill payments and his credit rating has been detrimentally impacted.
150. Additionally, Mr. Zimmer's mother was a co-signor on his mortgage. The mortgage payment defaults impacted both his and her credit rating as a result.

Police Brutality Toward Mr. Zimmer

151. Sometime on or around February 19, 2022, following the Unlawful Enactments, Mr. Zimmer was grabbed aggressively by unknown and unidentified members of the Police Defendants.
152. Other members of the Ottawa Protest had to pull Mr. Zimmer away from the attacking officers.
153. Mr. Zimmer was assaulted and battered by the Police Defendants for exercising his constitutional rights to free expression.

Erik Bueckert

154. The Plaintiff, Erik Bueckert ("Mr. Bueckert"), is an individual resident in Rossendale, Manitoba and is self-employed as a grain farmer.
155. Mr. Bueckert attended the Ottawa Protests from January 29, 2022, until February 26, 2022. Mr. Bueckert did not provide donations to the Ottawa Protest.

Frozen Bueckert Accounts

156. Mr. Bueckert is a customer of Stride where he holds chequing and savings accounts, a line of credit, and a credit card (the “**Bueckert Accounts**”) the Bueckert Accounts include accounts held jointly with Mr. Bueckert’s business partner and his wife.

157. On or around February 18, 2022, Mr. Bueckert discovered the Bueckert Accounts had been frozen. A manager from Stride Credit Union called Mr. Bueckert to inform him that the Bueckert Accounts had been frozen as a result of the Unlawful Enactments.

158. The Bueckert Accounts remained frozen for at least 6 days.

Police Brutality Towards Mr. Bueckert

159. Mr. Bueckert was arrested during the Ottawa Protest by unknown and unidentified members of the Police Defendants.

160. Mr. Bueckert was placed in a paddy wagon for over an hour during this arrest.

Andrew Fera

161. The Plaintiff, Andrew Fera (“**Mr. Fera**”), is an individual resident in Lethbridge, Alberta and an environmental protections officer.

162. Mr. Fera did not attend the Ottawa Protests but made donations to the Ottawa Protests through the GiveSendGo and GoFundMe platforms.

Frozen Fera Accounts

163. Mr. Fera is a customer of TD where he held various banking accounts including a credit card (the “**Fera Accounts**”).

164. On or around sometime after February 15, 2022, Mr. Fera discovered the Fera Accounts had been frozen as a result of the Unlawful Enactments. The Fera Accounts,

to the best knowledge of Mr. Fera were frozen for a period of approximately 4 days following the Unlawful Enactments including being unable to use his credit card.

165. When Mr. Fera inquired with TD regarding information on why the Fera Accounts were frozen, TD refused to provide any detailed information.

Wayne Narvey

166. The Plaintiff, Wayne Narvey (“**Mr. Narvey**”), is an individual resident in McNamee, New Brunswick and a member of Esgenoôpetitj First Nation. Mr. Narvey is a contractor.

167. Mr. Narvey attended the Ottawa Protests from February 1, 2022, until February 19, 2022.

Frozen Narvey Accounts

168. Mr. Narvey is a customer of National Bank where he holds various banking accounts (the “**Narvey Accounts**”).

169. On or around February 26, 2022, Mr. Narvey discovered the Narvey Accounts had been frozen. The Narvey Accounts, to the best knowledge of Mr. Narvey were frozen for a period of approximately 6 days following the Unlawful Enactments.

Police Brutality Towards Mr. Narvey

170. On or around February 19, 2022, while Mr. Narvey was sitting in his motor home (the “**Motor Home**”) in Ottawa, the Green Police Defendants broke the window on Mr. Narvey’s Motor Home and threw tear gas inside (the “**Narvey Assault and Battery**”). Without a warrant or explanation, members of the Green Police Defendants forcefully entered Mr. Narvey’s motor home to commit the Narvey Assault and Battery.

171. The Green Police Defendants grabbed Mr. Narvey and slammed him on the ground with excessive force during the Narvey Assault and Battery.

172. The Narvey Assault and Battery resulted in Mr. Narvey being arrested on February 19, 2022, and the Motor Home was seized by the Police Defendants.

Kathleen Marko

173. The Plaintiff, Kathleen Marko (“**Ms. Marko**”), is an individual resident in Grand Forks, British Columbia and the mother of the Plaintiff, Timothy Tiessen.

174. Ms. Marko did not attend the Ottawa Protests, nor did Ms. Marko donate to the Ottawa Protest. Ms. Marko did not support the Ottawa Protests, and was in fact opposed to it.

Frozen Marko Accounts

175. Ms. Marko is a customer of Grand Forks Credit Union, now called Gulf and Fraser Credit Union, where she held chequing and savings accounts (the “**Marko Accounts**”).

176. On or around February 18, 2022, after the Unlawful Enactments, Ms. Marko discovered the Marko Accounts had been frozen when she attended the Gulf and Fraser and was pulled into the office by an employee of the credit union who informed her of same.

177. To the best of her knowledge, Ms. Marko was targeted because her ex-common law partner, Mr. Sean Tiessen, was an organizer of the Ottawa Protests based in BC.

178. The Marko Accounts were frozen for approximately 7-10 days. Prior to the freezing, Ms. Marko was already living paycheque to paycheque and after the freezing Ms. Marko had to borrow funds for living expenses from her friends and family.
179. It is worth reiterating that not only did Ms. Marko not support the Ottawa Protests, she in fact opposed them, and despite that, the Marko Accounts were frozen.

Timothy Tiessen

180. The Plaintiff, Timothy Tiessen (“**Mr. Tiessen**”), is an individual resident in Grand Forks, British Columbia, and the son of Ms. Marko, as well as a cook.
181. Mr. Tiessen did not attend the Ottawa Protests, nor did he donate to the Ottawa Protest. Mr. Tiessen did not support the Ottawa Protests, and was in fact opposed to it. Mr. Tiessen was 17 years old at the time of the Ottawa Protests.

Frozen Tiessen Accounts

182. Mr. Tiessen is a customer of Grand Forks Credit Union, now called Gulf and Fraser Credit Union, where he held chequing and savings accounts (the “**Tiessen Accounts**”).
183. On or around February 18, 2022, after the Unlawful Enactments, Mr. Tiessen discovered the Tiessen Accounts had been frozen as a result of the Unlawful Enactments. Mr. Tiessen was unable to deposit his cheque from work at this time.
184. To the best of his knowledge Mr. Tiessen was targeted because Ms. Marko’s ex-common law partner, Mr. Sean Tiessen, who is Mr. Tiessen’s father was an organizer of the Ottawa Protests based in British Columbia.
185. The Tiessen Accounts were frozen for approximately 7-10 days.

186. It is worth reiterating that not only did Mr. Tiessen not support the Ottawa Protests, he in fact opposed them, and despite that, the Tiessen Accounts were still frozen.

Nicola and Arielle Fortin

187. The Plaintiff, Nicola Fortin (“**Mr. Fortin**”), is an individual resident in Strathmore, Alberta, and a plumber by trade. The Plaintiff, Arielle Fortin (“**Ms. Fortin**”) is an individual resident in Strathmore, Alberta, and the wife of Mr. Fortin (collectively, hereinafter referred to as the “**Fortins**”).

188. The Fortins did not attend the Ottawa Protest but donated to the Ottawa Protests through the GoFundMe platform.

Frozen Fortin Accounts

189. The Fortins are customers of RBC and jointly held an account at RBC (the “**Fortin Accounts**”).

190. The Fortin Accounts were frozen on or around February 18, 2022, and remained frozen for a period of 10-12 days.

191. During this time, and as a direct result of the freeze, the Fortins were unable to make several important payments which included but were not limited to their mortgage payments and car insurance renewal.

192. As a result of the freeze, the Fortins were unable to pay for basic necessary living expenses for themselves and their children. Mr. Fortin was unable to attend jobsites due to his inability to purchase fuel.

E. The Nature of the Action

The Unlawful Enactments

193. In response to public health measures made in early 2022 and for various other reasons, a group of Canadian individuals and businesses launched a protest often referred to as the Freedom Convoy. In late January 2022, participants travelled to Ottawa, Ontario to protest (the “**Ottawa Protest**”).

194. On February 14 and 15, 2022, the Crown, relying on s. 17(1) and s. 19(1) of the *Emergencies Act*, RSC 1985, c 22 (4th Supp) (the “*Emergencies Act*”) declared a public order emergency and issued the Unlawful Enactments.

195. On February 15, 2022, two Orders in Council were issued by the Government of Canada which were the Regulations and the Economic Order.

196. With respect to the Regulations, section 2(1) created a prohibition for a person to participate in a public assembly that may reasonably be expected to breach the peace by:

- a. serious disruption of the movement of persons or goods or the serious interference with trade;
- b. interference with the function of critical infrastructure; or
- c. the support of the threat or use of acts of serious violence against persons or property.

197. The Regulations further created prohibitions on assembly at section 5 which stipulates that, “a person must not, directly or indirectly, use, collect, provide make [sic] available or invite a person to provide property to facilitate or participate in any

assembly referred to in subsection 2(1) for the purpose of benefiting any person who is facilitating or participating in such an activity”.

198. With respect to the Economic Order, “designated person” means any individual or entity that is engaged, directly or indirectly, in an activity prohibited by sections 2 to 5 of the Regulations.

199. Section 2(1) of the Economic Order required the Financial Institution Defendants to immediately freeze the assets of a “designated person”. Specifically, the Financial Institution Defendants were to cease:

- a. dealing in any property, wherever situated, that is owned, held or controlled, directly or indirectly, by a designated person or by a person acting on behalf of or at the direction of that designated person;
- b. facilitating any transaction related to a dealing referred to in paragraph a;
- c. making available any property, including funds or virtual currency, to or for the benefit of a designated person or to a person acting on behalf of or at the direction of a designated person; or
- d. providing financial or related services to or for the benefit of any designated person or acquire any such services from or for the benefit of any such person or entity.

200. Section 3 of the Economic Order further required the Financial Institution Defendants to determine on an ongoing basis whether they were in possession or control of property that was owned, held or controlled by or on behalf of a designated person.

201. Notably, the Economic Order provides no guidance, process, or standard for how the Financial Institution Defendants were to make such ongoing warrantless search and seizure determinations or the legitimacy of such determinations. Likewise, the Economic Order provides no neutral arbiter, no independent oversight, no neutral standard to assess the veracity of an individual or entity being labeled a “designated person”, nor is there any right of appeal for an individual or entity that received a “designated person” label. Furthermore, no consideration or contemplation is made regarding joint bank account holders of a so called “designated person”.

202. It is also unclear how spying on and monitoring the financial transactions and activities of Canadian citizens by the Financial Institution Defendants in-and-of-itself in isolation without further context could definitively allow an unknown individual employed by the Financial Institution Defendants to make such a determination about who should become a “designated person”. The true scope and extent that the Financial Institution Defendants surveilled, monitored, and spied on their customers and Canadian citizens is only knowable by the Financial Institution Defendants and Crown Defendants which will become discoverable in this action.

203. Section 5 of the Economic Order further required the Financial Institution Defendants to disclose without delay to the Commissioner of the RCMP or to the Director of the Canadian Security Intelligence Service (“CSIS”):

- a. the existence of property in their possession or control that they have reason to believe is owned, held, or controlled by or on behalf of a designated person; and

- b. any information about a transaction or proposed transaction in respect of property referred to in paragraph a.

204. Beyond the Financial Institution Defendants conducting their own warrantless search and seizures without independent oversight, or any discernable and lawful objective standards consistent with section 8 of the *Charter* against unreasonable search and seizure, an individual or entity could be labeled as a “designated person” by the RCMP or Police Defendants. It appears that the mere labelling by the RCMP or Police Defendants was a sufficient condition for the Financial Institution Defendants being mandated under section 2(1) of the Economic Order to freeze the bank accounts of the Plaintiffs.

205. With respect to the Economic Order, it was *ultra vires* section 19 of the *Emergencies Act* because it created an extra-judicial search and seizure scheme for which there was no authority to do so. A plain and literal reading of the Economic Order and its application thereof to freeze the bank accounts and financial assets of a “designated person” is a search and seizure under section 8 of the *Charter*. In addition to freezing the bank accounts and financial assets of the Plaintiffs, their personal information and financial transactional information was searched and seized when it was being provided to the Crown Defendants, the RCMP, and CSIS. The personal information and financial transactional history go to the biographical core of an individual and contains deeply personal information about their lives. Furthermore, some of the Plaintiffs were joint account holders who were not a “designated person”, yet they still had their banks accounts frozen and seized.

206. While the Regulations and Economic Order are unlawful, even absent that finding, the Plaintiffs did not engage in activities that ought to have constituted them being labeled as a “designated person”.

Aggravating Factors for Consideration Leading up the Unlawful Enactments

207. Leading up to the Unlawful Enactments during the Ottawa Protests, several Defendants, acting together, or acting individually, as the case may be:

- a. Made public and widely publicized denigrating and derogatory comments falsely characterizing the nature, scope, beliefs, and motives of the persons participating in the Ottawa Protests including some of the Plaintiffs;
- b. Published and widely distributed written material including defamatory comments about the Ottawa Protests knowingly containing false and misleading information about the Ottawa Protests;
- c. Conspired with or influenced major Canadian media outlets to publish false reports about the activities of the protestors present at the Ottawa Protests;
- d. Made false reports regarding the activities of the protestors present at the Ottawa Protests to Crown officials and made false statements to Crown officials in such a way that promoted the Unlawful Enactments;
- e. Sought to harm, injure, or otherwise denigrate the reputations of the Plaintiffs with malicious intent; and
- f. Made such further and other public statements and publications which denigrated and harmed the reputations of the Plaintiffs as will be discovered at the trial of this action.

208. The conduct of the Defendants, and the false information which was disseminated by several Defendants to the Canadian media, the Financial Institution Defendants, the Crown and the citizens of Canada influenced and enabled the decision to invoke the impugned Unlawful Enactments.
209. The decisions taken by the individual Defendants, the Police Defendants, the Crown Defendants, the Financial Institution Defendants, and the CAHN Defendants were done cynically, politically, and selfishly without the appropriate consideration for the best interest of Canada and its citizens and with wanton disregard for the wellbeing of the Plaintiffs.
210. Intelligence reports at the time of the Ottawa Protests from the RCMP, OPS, Police Defendants, and CSIS did not show that the Ottawa Protests were a threat to national security, and indeed consistently corroborated the overall peaceful nature of the Ottawa Protests.
211. While deliberately knowing that the Ottawa Protests was largely a peaceful protest, the Crown Defendants, and in particular Ms. Jody Thomas given her role as the National Security and Intelligence Advisor took it upon themselves to create their own open source intelligence operation to create a new flow of intelligence to the Crown Defendants (the “**Thomas Open Source Intelligence Reporting**”) which influenced their decision to invoke the *Emergencies Act* and Unlawful Enactments.
212. The Thomas Open Source Intelligence Reporting was an unsanctioned, and politically motivated open source intelligence operation which reflected the intentionally biased view of the narrative that Ms. Thomas and the Crown Defendants wanted, rather than the truth about the overall peaceful nature of the Ottawa Protests.

This included relying heavily upon false or otherwise one-sided open source information and giving undue emphasis or weight to misleading or otherwise biased narratives including those from the CAHN Defendants or their proxies on social media.

213. For greater certainty, in her role as National Security and Intelligence Advisor, Ms. Thomas had the entire intelligence and security information assets at her disposal to draw upon, including military and defence. Ms. Thomas and her office were authorized to draw upon information and intelligence from at least five different secretariat level sources. These include Emergency Preparedness, Intelligence Assessment, Foreign Policy, Defence Policy, and the National Security Council. In addition to the secretariat level information and intelligence sources, Ms. Jody Thomas had several agencies providing intelligence flows which includes but is not limited to CSIS, the RCMP, the Department of National Defence, the Canadian Armed Forces, and the Communications Security Establishment Canada.
214. None of the intelligence reports or flows of intelligence from the plethora of integrated government-wide perspectives and sources that Ms. Thomas had available to her could be used to justify the invocation of the *Emergencies Act*, nor did they suggest that the Ottawa Protests were a threat to national security.
215. The Thomas Open Source Intelligence Reporting was a deliberate attempt to bypass the secretariat level intelligence and the intelligence flows from the numerous agencies that Ms. Thomas and her office had at their disposal. The Thomas Open Source Intelligence Reporting reflected the views and narratives that she wanted to

- advance, and it was not the integrated government-wide intelligence perspective that was required.
216. The Crown Defendants, members of Cabinet both named and not named as Defendants in this action, accepted the information contained in the Thomas Open Source Reporting and misinformation from the CAHN Defendants or their proxies either negligently or with malicious intent when they knew or ought to have known that such information was misleading, grossly exaggerated, defamatory, and harmful.
217. Essentially, when all or some of the Crown Defendants were unable to obtain the intelligence required to justify invoking the *Emergencies Act* or demonstrate that the Ottawa Protests were a threat to national security, they embarked on their own unsanctioned open source intelligence operation by way of the Thomas Open Source Intelligence Reporting to create a new flow of intelligence to the Prime Minister's Office and to Cabinet while negligently or intentionally relying upon information that they knew or ought to have known was untrue, exaggerated, misleading, defamatory, and biased.
218. The Court ought to give weight to the above paragraphs as an aggravating factor in the course of this litigation when assessing the appropriate level of damages and financial compensation for the Plaintiffs.

The Unlawful Enactments and the Consequences

219. Following the Unlawful Enactments financial products, private property, information and services of several Canadians, including the Plaintiffs, were unlawfully searched, seized, or otherwise frozen by the Financial Institution Defendants acting in concert with the RCMP and the Crown Defendants.

220. Following the Unlawful Enactments several Plaintiffs who were participating in the Ottawa Protests were physically injured, battered, assaulted, or otherwise harmed by the RCMP, OPS, and other known and unknown Police Defendants who were engaging in enforcement actions pursuant to the Unlawful Enactments.

221. The Defendants caused damage to the Plaintiffs who are all Canadians or Canadian businesses, including Indigenous peoples, senior citizens, retired police officers, decorated military veterans, racialized minorities, minors, single mothers, and people with disabilities.

222. In *Canadian Frontline Nurses v. Canada (Attorney General)*, 2024 FC 42 (the “**Mosley Decision**”), the Honourable Mr. Justice Mosley held that the reasons provided for the decision to declare a public order emergency did not satisfy the requirements of the *Emergencies Act* and were therefore *ultra vires*. Likewise, the Regulations violated section 2(b) of the *Charter* against the freedom of thought, belief, opinion and expression and the Economic Order violated section 8 of the *Charter* against unreasonable search and seizure. Neither the Regulations nor the Economic Order were saved by section 1 of the *Charter* in the Mosley Decision. Therefore, both the Regulations and Economic Order were ruled as being unconstitutional, and the implementation thereof was therefore unlawful.

223. In any event, apart from the Mosley Decision, the Plaintiffs did not engage in activities that ought to have given rise to them being labelled a “designated person”.

F. Causes of Action

Negligence

224. The Plaintiffs plead that the Defendants, any or all of them:

- a. owed both private and public duties of care to the Plaintiffs or each of them arising from their roles as legislative bodies, financial institutions, police services, non-governmental organizations, public figures, municipalities or individuals as the case may be;
- b. breached their respective duties of care owed to the Plaintiffs by:
 - i. unlawfully and unreasonably disclosing personal information including financial information of the Plaintiffs;
 - ii. unlawfully and unreasonably seizing financial accounts, including bank and credit card accounts of the Plaintiffs;
 - iii. unlawfully and unreasonably disseminating false information about the Plaintiffs with malicious intent to harm or otherwise negligently;
and
 - iv. engaging in such further and other unlawful and unreasonable conduct as will be proven at the trial of this action;
- c. it was reasonably foreseeable that by engaging in the conduct enumerated in subparagraphs i – iv above the Defendants would cause harm to the Plaintiffs either directly or indirectly; and
- d. as a result of the Defendants' breaches of their respective duties of care owed to the Plaintiffs, each and every Plaintiff suffered harm both directly and indirectly.

Misfeasance of Public Office

225. Through the Unlawful Enactments, the Crown Defendants, their agents, employees and servants owed public law duties to the Plaintiffs. The Crown Defendants were obligated to comply with the provisions of the *Emergencies Act* including the conditions precedent required for its invocation. Their unreasonable decision to invoke the Unlawful Enactments while knowingly failing to abide by the provisions required for the invocation of the *Emergencies Act* was unlawful. This high-handed conduct directed towards the Plaintiff's constitutes misfeasance of public office and is a compensable claim for damages.

226. The Plaintiffs further state that the individual and Crown Defendants ought to be held personally liable to pay for their wrongdoing and harm caused to the Plaintiffs and the citizens of Canada.

227. The Crown Defendants failed in their public law duty to the Plaintiffs to act lawfully. Alternatively, their decision was motivated by an improper purpose or otherwise took into account irrelevant considerations or ignored relevant considerations and was unlawful. The reliance upon the unsanctioned Thomas Open Source Intelligence Reporting as a new flow of intelligence over the integrated government-wide perspective that was required was a deliberate decision and was knowingly done for an improper purpose which exceeded their powers as public officials.

228. The Crown Defendants' decision misinformed the public and resulted in the enactment of legislation of a draconian nature either negligently or deliberately to harm the Plaintiffs who were viewed by the Defendants as political opponents and was done for political reasons against Canadian citizens living in a free and

democratic society exercising their rights to free expression. The Crown Defendants' conduct in misinforming the public is morally reprehensible, blameworthy, and unconscionable.

229. The Crown Defendants were aware that the Plaintiffs would likely suffer damages as a result of their actions and that such harm was reasonably foreseeable but did so anyways despite knowing the harm it would cause.

230. The deliberate and unlawful conduct of the Crown Defendants directly and indirectly caused the Plaintiffs damages, hardships, expenses, and loss both tangible and intangible.

Abuse of Process

231. The conduct of the Crown Defendants in invoking Unlawful Enactments compromised the integrity of the justice system in Canada and undermined judicial processes which would have otherwise been required in the absence of the invocation of the *Emergencies Act*.

232. The Economic Order compelled the Financial Institution Defendants to unlawfully search and seize the Plaintiffs' bank accounts along with their financial and personal information. It further required the Financial Institution Defendants to spy on and treat their customers with hostility as an agent of the state while providing no coherent objective criteria, no standard to adhere to in making such determinations, and no independent oversight while doing so. The Economic Order was done cynically, politically, and selfishly without due considerations for the lasting impact it would have on Canadian citizens, our reputation internationally, and trust in our institutions.

This includes the detrimental impacts on joint account holders who were not “designated persons”.

233. Rather than proceeding with the Unlawful Enactments, the Crown Defendants and Police Defendants ought to have used existing laws as required rather than instituting draconian *Charter* violating measures.

234. The fact that the Police Defendants and the OPS in particular displayed weak leadership, operational incompetence, lacked collective willpower, and were incapable or otherwise unwilling to enforce existing laws does not provide justification for the Abuse of Process that the Unlawful Enactments instantiate.

Interference with Economic Relations and Inducing Breach of Contract

235. As a further result of the Unlawful Enactments the Defendants interfered with the Plaintiffs’ economic interests, contractual and business relations, and business relationships. The Unlawful Enactments frustrated and otherwise caused various contracts between the Plaintiffs, their financial institutions, and other third parties to be breached thereby causing the Plaintiffs to suffer damages.

236. In particular, the Unlawful Enactments, and the resulting unlawful seizures by the Financial Institution Defendants interfered with the economic interests of:

- a. Jonker Trucking in the manner described at paragraphs 132-134 herein;
- b. Mr. Zimmer in the manner described at paragraphs 144-150 herein;
- c. Mr. Miller in the manner described at paragraphs 47-51 herein;
- d. Ms. Marko in the manner described at paragraphs 175-179 herein;

- e. Mr. Tiessen in the manner described at paragraphs 182-186 herein;
- f. The Fortins in the manner described at paragraphs 189-192 herein; and
- g. Mr. Laidley in the manner described at paragraphs 56-61 herein.

237. It was intended, or reasonably foreseeable that the Unlawful Enactments, and the resulting seizure and freezing of the Plaintiffs' financial products, private property, services, and information would frustrate the ability of the Plaintiffs to exercise their rights under their various contracts and cause the Plaintiffs to suffer damages.

Breach of Section 8 and 2(b) Charter Rights and Section 24(1) Remedy

238. In the Mosley Decision, Justice Mosley confirmed that the Unlawful Enactments were in breach of the Plaintiffs' *Charter* rights, specifically section 2(b) with respect to the Regulations and section 8 with respect to the Economic Order and that neither were saved by section 1 of the *Charter*.

239. Even absent the Mosley Decision, the Plaintiffs ought not to have been labeled as a "designated person", and even if the clearly section 8 *Charter* violating Economic Order was not ruled unconstitutional by the Federal Court, the Plaintiffs would still be entitled to damages for violation of their *Charter* rights in any event in this action.

240. The Economic Order violated section 8 of the *Charter* and is *ultra vires* the *Emergencies Act*. Section 19 of the *Emergencies Act* does not permit or authorize the type of extra-judicial warrantless search and seizure schemes that came to fruition in the Economic Order. Thus, the search and seizure of the Plaintiffs' bank accounts and financial assets violated their section 8 rights and is contrary to the section 8 jurisprudence.

241. The Financial Institution Defendants had no lawful authority to conduct warrantless search and seizures in the manner that they were conducted, nor did the Crown Defendants have the ability to lawfully issue such orders to do so.
242. The Plaintiffs seek a substantial award of damages under this head of damages for their section 8 *Charter* rights being violated.
243. To the extent that certain Plaintiffs also had their section 2(b) *Charter* rights violated, those Plaintiffs seek a further substantial award of damages.
244. Pursuant to section 24(1) of the *Charter*, the Plaintiffs, all of whom were subject to the Unlawful Enactments, and several of whom suffered additional *Charter* breaches seek awards for damages flowing from the Defendants' breach of their *Charter* rights.
245. The Plaintiffs have established and will establish at trial that their *Charter* rights have been breached. Damages are just and appropriate as a form of remedy given that it fulfills the function of compensation, vindication of the rights violated, and serves as a deterrence against future *Charter* violations by the Crown Defendants.
246. The Crown Defendants will be unable to demonstrate any countervailing factors that would render such damages inappropriate and unjust under section 24(1) given the serious *Charter* violations that occurred against the Plaintiffs.
247. The Plaintiffs plead and state that a substantial award at trial for the *Charter* violations is warranted and the primary consideration of deterrence from future government action of this nature ought to be heavily weighed and awarded.

Trespass to Chattels and Conversion

248. The Defendants, by their conduct intentionally interfered with the Plaintiffs' possession of, and access to, monies in the unlawfully seized bank accounts.
249. The Defendants denied the Plaintiffs access to their financial services and private property, and accordingly are liable to the Plaintiffs for conversion and trespass to chattels as their actions constitute interference with the Plaintiffs' property without legal justification.
250. In addition, the Police Defendants by their conduct intentionally interfered with:
- a. Mr. McAllister's possession of his truck as described at paragraphs 100-105; and
 - b. Mr. Narvey's possession of his motor home as described at paragraphs 170-172.

Injurious Falsehood and Defamation

251. Immediately preceding, during, and following the Unlawful Enactments, the Defendants, any or all of them, published false statements designed to lower the public opinion of anyone participating in the Ottawa Protests, including the Plaintiffs.
252. The CAHN Defendants in particular, provided false information to several other Defendants and media organizations designed to harm the Plaintiffs. Falsified or otherwise highly exaggerated information was supplied by the CAHN Defendants or their proxies to the Crown Defendants and the Police Defendants in support of the Unlawful Enactments.
253. The statements made by the CAHN Defendants and their proxies defamed the Plaintiffs and influenced the decision to invoke the *Emergencies Act*.

254. The statements were false and were made with malice to advance the political agenda of the CAHN Defendants. The CAHN Defendants at one point were recipients of funding and financial support from the Government of Canada. The CAHN Defendants as recently as August 2023, have requested further financial funding for themselves and their causes from the Government of Canada requesting taxpayer money in excess of \$130 million over the next 5 years. The true extent of the historical and ongoing financial funding of the CAHN Defendants by the Government of Canada is not fully known but will be discovered during this action.

255. The Plaintiffs, any or each of them, suffered damages as a result of the defamatory statements by the CAHN Defendants which were dishonest, deceitful, and exaggerated while done with malicious intent to cause harm including labelling the Ottawa Protestors, including the Plaintiffs, as being racist, accelerationist, far right extremists, falsely accusing supporters of the Ottawa Protestors as being Nazi's, misogynistic, and disseminating other hateful and defamatory false accusations about the Plaintiffs some of whom are Indigenous peoples, racialized minorities, persons of colour, women, senior citizens, and disabled individuals.

256. The CAHN Defendants have themselves knowingly propagated hatred, sowed division within Canada, fomented distrust, spread misinformation, and have defamed the Plaintiffs with malevolent intent and for cynical purposes to advance a political agenda which has in the past been paid for and funded by the Canadian taxpayers.

257. Furthermore, the Crown Defendants in relying upon the Thomas Open Source Intelligence Reporting defamed the Plaintiffs when public statements were made repeating the same false information and narratives. In many instances, the Thomas

Open Source Intelligence Reporting relied upon the false information from the Government of Canada funded CAHN Defendants and their proxies in a closed loop as a means to improperly justify the illegal invocation of the *Emergencies Act*.

258. The Plaintiffs seek compensable damages against the CAHN Defendants and the Crown Defendants for their injurious falsehoods and defamation.

Intrusion upon Seclusion

259. The Plaintiffs had a strong and reasonable expectation of privacy in their financial records as recognized by the court in the Mosley Decision. The financial records disclosed by the Financial Institution Defendants are part of the biographical core of personal information which the Plaintiffs, and indeed any individuals, in our free and democratic society wish to maintain and control from dissemination to the state.

260. The financial records unlawfully accessed pursuant to the Unlawful Enactments and seized by the Defendants included information which revealed personal details about the Plaintiffs. By unlawfully seizing and accessing these records, the Financial Institution Defendants intentionally intruded upon the seclusion of the Plaintiffs' private affairs and concerns. Further, to the extent that the Financial Institution Defendants seized and accessed these records on behalf of the Crown Defendants, both the Financial Institution Defendants and Crown Defendants should be held jointly and severally liable.

Assault and Battery

261. On various occasions following the Unlawful Enactments agents and officers of the RCMP, OPS, and other unknown Police Defendants including the Green Police Defendants committed assault and battery against certain the Plaintiffs. In particular:

- a. Unidentified members of the RCMP, OPS, or unknown Police Defendants including the Green Police Defendants assaulted:
 - i. Ms. Milner in the manner described at paragraphs 77-89;
 - ii. Mr. Zimmer in the manner described at paragraphs 151-153;
 - iii. Mr. Miller in the manner described at paragraphs 52-53;
 - iv. Mr. McAllister in the manner described at paragraphs 100-105;
 - v. Mr. Narvey in the manner described at paragraphs 170-172;
 - vi. Mr. Laidley in the manner described at paragraphs 62-63; and
 - vii. committed such further and other unlawful acts which violated the person of any and each of the Plaintiffs as will be proven at the trial of this action;
- b. In committing said acts enumerated at subparagraphs i-vii above acted intentionally or negligently or with willful blindness or recklessness toward the relevant Plaintiffs; and
- c. In committing assault and battery against the Plaintiffs they were acting unlawfully and without justification.

Harassment and Intimidation

262. On various occasions preceding, during and following the Unlawful Enactments the Defendants, any or each of them engaged in communications and threats, many of which were widely publicized and of a public nature, which caused the Plaintiffs to

fear for their safety, and the safety of their loved ones. These communications included but were not limited to:

- a. Public statements from the Crown Defendants and OPS, in particular statements made by Chief Bell regarding further financial sanctions and tracking individuals down for exercising their rights to free expression;
- b. Statements and communications on social media; and
- c. Stalking and other harassing behavior by members of the Crown Defendants and Police Defendants.

263. The Defendants knew or ought to have known that these communications were unwelcome and could reasonably foresee that such communications and behaviours could reasonably cause emotional distress.

264. As a result of these behaviours, the Plaintiffs suffered emotional distress, feared for their well-being and otherwise suffered harm.

265. The threats and behaviours enumerated above in subparagraphs a – c above were designed to coerce the Plaintiffs to refrain from exercising their constitutional rights pursuant to section 2(b) of the *Charter*.

266. As a result of these threats and behaviours coupled with the Unlawful Enactments, the Plaintiffs suffered loss and damages and were prevented from exercising their free and democratic rights.

267. Therefore, the Defendants are liable in tort for their intimidation and harassment of the Plaintiffs.

Civil Conspiracy

268. The actions of the Defendants were taken together in concert with other Defendants.

The Crown Defendants, Financial Institution Defendants, Police Defendants, CAHN Defendants, and individuals involved worked together to share information, disseminated misinformation about the Plaintiffs, enacted the Unlawful Enactments on unconstitutional pretenses and ultimately froze or otherwise searched and seized the financial services, assets, and private property of the Plaintiffs in an unlawful manner.

269. Each of the Defendants ultimately assisted one another in their unlawful actions perpetrated against the Plaintiffs.

270. The Plaintiffs' injuries were consequences of the concerted actions of the Defendants working together in a way that directly caused the harm suffered.

271. The actions of the Defendants were unlawful, and the Defendants knew or ought to have known in the circumstances that their actions would likely cause injury to the Plaintiffs.

272. The actions of the Defendants for their civil conspiracy gives rise to compensable damages and ought to be considered as an aggravating factor when apportioning liability and quantum of damages owed to the Plaintiffs.

Breaches of Legislation

273. The Financial Institution Defendants, and the Banking Defendants in particular were bound by the express provisions of the *Bank Act*, SC 1991, c 46.

274. The Financial Institution Defendants, by

- a. unlawfully disclosing the information of the Plaintiffs;
- b. refusing to provide the Plaintiffs with access to their funds; and
- c. acting arbitrarily to identify the Plaintiffs for the purpose of freezing their accounts

violated their lawful obligations owed to the Plaintiffs pursuant to the *Bank Act*.

Breaches of Contract

275. The Financial Institution Defendants, by engaging in the conduct described in the preceding paragraphs above breached their contractual obligations owed to the Plaintiffs pursuant to their various contracts for financial products and services with the Financial Institution Defendants.

276. Further, the Financial Institution Defendants had a duty to perform their obligations under the contracts with the Plaintiffs in good faith.

277. By their conduct, the Financial Institution Defendants wholly failed to perform these obligations in good faith contrary to the fundamental principles of contract and their fundamental duties owed to the Plaintiffs.

278. The Financial Institution Defendants in addition to their breaches of contract breached their common law duties owed to the Plaintiffs. The breaches of contract by the Financial Institution Defendants are compensable damages.

G. Damages

279. The conduct of the Defendants toward each and every Plaintiff in these circumstances included several torts, breaches of fundamental rights and freedoms, and wanton

- disregard for the well-being of the individual Plaintiffs. The conduct was unlawful, reprehensible, was politically motivated and charged which included large-scale attempts to intimidate, denigrate, defame, and otherwise disparage and discourage the Plaintiffs.
280. The Plaintiffs were unlawfully targeted unconstitutionally and had their *Charter* rights violated without due process or procedure and suffered harm as a result.
281. This is an exceptional case wherein the conduct of the Defendants, any or all of them, was malicious, high-handed, and reprehensible misconduct that offends the Court's sense of decency and a substantial punitive damages award is warranted in these circumstances to dissuade such future conduct.
282. Given the location of the Defendants and the clear nexus this action has to the Ottawa Protests and the Unlawful Enactments, Ontario is the proper jurisdiction and forum for this action to be heard in.
283. The Plaintiffs repeat and adopt the relief sought in paragraph 1 of the Statement of Claim in its entirety including all declaratory relief. With respect to the monetary relief sought, the Plaintiffs repeat here and seek the following monetary relief against the Defendants, jointly and/or severally, for:
- a. General and special damages in the amount of \$500,000 for each Plaintiff for negligence, breach of contract, unlawful interference, misfeasance of public office, trespass to chattels, civil conspiracy, and abuse of process for the unlawful seizure of bank accounts by the Defendants;

- b. General and special damages in the amount of \$100,000 for each Plaintiff for injurious falsehoods and defamation resulting from the conduct of the Defendants;
 - c. General and special damages in the amount of \$100,000 for each Plaintiff for negligence, assault, battery, harassment, and intimidation perpetrated by the Defendants against the Plaintiffs;
 - d. General and special damages pursuant to section 24(1) of the *Charter* in the amount of \$500,000 for each Plaintiff for the Defendants' unjustified breach of the Plaintiffs' *Charter* rights;
 - e. Punitive, exemplary and/or aggravated damages in the amount of \$1,000,000 for each Plaintiff considering the malicious, reprehensible, and high-handed misconduct of the Defendants;
 - f. prejudgment and post judgment interest in accordance with the *Courts of Justice Act*, RSO 1990 c.C.43;
 - g. costs of this action (legal fees and disbursements) on a solicitor and own client basis or otherwise on a substantial indemnity basis plus applicable harmonized sales tax in accordance with the *Excise Tax Act*, RSC, 1985, c. E-15 and the *Courts of Justice Act*, RSO 1990 c.C.43; and
 - h. Such further and other relief as this Honourable Court deems just.
-

Date: March 15, 2024

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Solicitors for the Plaintiffs

Court File No./N° du dossier du greffe : CV-24-00095074-0000

Court File No.: CV-24-00094733-0000

EDWARD CORNELL et al. - and - **JUSTIN TRUDEAU et al.**

Plaintiffs

Defendants

**ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT OTTAWA**

STATEMENT OF CLAIM

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Court File No.: CV-24-00095074-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

EDWARD CORNELL, VINCENT GIRCYS, LINDSAY MILNER, SHAUN ZIMMER, ANDREW MILLER, JONKER TRUCKING INC., ANDREW FERA, WAYNE NARVEY, CLAYTON MCALLISTER, KATHLEEN MARKO, NICOLA FORTIN, ARIELLE FORTIN, THOMAS QUIGGIN, TIMOTHY TIESSEN O'JAY LAIDLEY, ERIC BUECKERT, PETER TERRANOVA, NANCY TERRANOVA, RICHARD OCELAK, and KERRI-ANN HAINES

Plaintiffs

-and-

JUSTIN TRUDEAU, CHRYSTIA FREELAND, DAVID LAMETTI, DOMINIC LEBLANC, BILL BLAIR, MARCO MENDICINO, ATTORNEY GENERAL OF CANADA, JODY THOMAS, ROYAL CANADIAN MOUNTED POLICE, DENIS BEAUDOIN, BRENDA LUCKI, STEVE BELL, ROBERT BERNIER, OTTAWA POLICE SERVICES BOARD, OTTAWA POLICE SERVICE, THE TORONTO-DOMINION BANK, CANADIAN IMPERIAL BANK OF COMMERCE, BANK OF MONTRÉAL, NATIONAL BANK OF CANADA, ROYAL BANK OF CANADA, BANK OF NOVA SCOTIA (SCOTIABANK), CANADIAN TIRE SERVICES LTD. doing business as CANADIAN TIRE BANK, MERIDIAN CREDIT UNION, ASSINIBOINE CREDIT UNION, GULF & FRASER CREDIT UNION, STRIDE CREDIT UNION, SIMPLII FINANCIAL, CANADIAN ANTI-HATE NETWORK, BERNIE FARBER, JOHN DOE, and ABC CORP.

Defendants

AFFIDAVIT OF RICHARD WARMAN

I, RICHARD WARMAN, of the City of Ottawa, in the Province of Ontario, **MAKE OATH AND SAY:**

1. I am a Board Member of the Defendant, the Canadian Anti-Hate Network (“CAHN”). As such, I have personal knowledge of the information hereinafter deposed. Where I make statements in this affidavit based on information that is not within my personal knowledge, I have provided the source of such information and have stated my belief that the information is true.

2. I am a lawyer and member in good standing of the Law Society of Ontario. Beyond my involvement in CAHN, I have also been engaged in human rights law and litigation.

Background on CAHN

3. CAHN is an independent, nonprofit organization whose mandate is to monitor, research, and counter hate groups by providing education and information on hate groups to the public, media, researchers, courts, law enforcement and community groups.

4. CAHN is not a public body nor a governmental organization.

5. CAHN's staff and board members are frequently quoted in news reports dealing with far-right individuals, groups, and movements. CAHN is frequently referenced in academic reports. Representatives of CAHN have testified on its behalf in both the House of Commons and the Senate of Canada.

6. Given CAHN's role in countering far-right hate groups, it is often the target of criticism and conspiracy theories. In particular, a recurring theme is that CAHN is funded by the Liberal government in order to help it achieve its own political goals. Such allegations are false.

7. CAHN previously received a grant of \$268,400 over two years from the Anti-Racism Action Program to monitor and report on hate promoting individuals, groups and movements, and to create an educational toolkit. CAHN's application was selected by federal bureaucrats. At no time did any politician help CAHN get the grant. At no time did any politician or agent of any political party suggest what CAHN should cover or how CAHN should cover it.

8. CAHN has applied for further grants from the Federal Government. The \$130 million figure attributed at paragraph 254 of the Statement of Claim to being a request for funding from CAHN, however, represents the total amount CAHN recommended the Federal Government spend on anti-racism projects over the next five-years based on previous funding commitments in the field. It was not a request for \$130 million in funding to CAHN.

9. CAHN is an independent organization and has never taken direction from any political party or its agents. CAHN has never and will never accept funding that comes with conditions which would impact its independence.

The Public Interest in the Ottawa Protests and CAHN's Expressions

10. CAHN was interested in the so called “Freedom Convoy” movement, which culminated with the protests that occupied the downtown of Ottawa in January and February 2022 (the “**Ottawa Protests**”). CAHN’s interest stemmed from the connections between the movement and various elements of the far right.

11. From my review of the Statement of Claim, I am unable to determine what the Plaintiffs allege to be the impugned expressions made by CAHN. Therefore, I asked CAHN staff to put together a collection of all of the expressions it was able to identify made by CAHN officials about the “Freedom Convoy” and the Ottawa protests prior to the Government of Canada’s invocation of the *Emergencies Act*. I have outlined in this affidavit the articles that were located that were published by CAHN and articles in which CAHN officials were cited.

12. On January 27, 2022, prior to the Ottawa protests, CAHN published an article on its website entitled “The ‘Freedom Convoy’ is Nothing but a Vehicle for the Far Right”. A copy of this article is attached as **Exhibit A**.

13. The only plaintiff identified in the January 27, 2022 article is Thomas Quiggin. The article explains the connection between Tamara Lich, one of the organizers of the “Freedom Convoy” identified on a GoFundMe fundraiser website, and Quiggin.

14. Quiggin is a controversial figure. At the time the January 27, 2022 article was published, the following publications were available online about him:

- a. An article by PressProgress dated February 28, 2017 (attached as **Exhibit B**);
- b. A press release from the National Council of Canadian Muslims dated August 23, 2016 (attached as **Exhibit C**); and
- c. An article in Maclean’s Magazine dated February 24, 2017 (attached as **Exhibit D**).

15. On January 28, 2022, Al-Jazeera published an article entitled “Canada’s trucker protests: What is going on?” which cited the CAHN January 27, 2022 article. The article was later edited to include updates regarding the Ottawa protests, including the invocation of the *Emergencies Act*. A copy of this article is attached as **Exhibit E**. None of the Plaintiffs are subjects of this article.

16. On January 28, 2022, the Toronto Star published an article entitled “‘Freedom Convoy’ leader shared symbol of far-right hate group on TikTok” that included several quotes from CAHN’s Executive Director, Evan Balgord. Mr. Balgord shared his viewpoints on the connection between hate groups and the Ottawa protests. He explained that not everyone that participated shared the ideologies of the hate groups, but that the legitimate concerns being raised by truck drivers, which was supposed to be the basis of the movement, would be lost given the presence of these hateful ideologies. A copy of this article is attached as **Exhibit F**. None of the Plaintiffs are subjects of this article.

17. On January 28, 2022, PressProgress published an article entitled “Conservative MP Pictured With Ex-WEXIT Campaigner Who Suggested Fighting COVID-19 Restrictions ‘With Bullets’”. The article quotes Mr. Balgord who stated that “the convoy has been organized and led by the far right”. A copy of the article is attached as **Exhibit G**. None of the Plaintiffs are subjects of this article.

18. On January 29, 2022, Global News published an article on its website entitled “Some trucker convoy organizers have history of white nationalism, racism”. The article quotes Mr. Balgord as stating: “We’re saying that this is a far-right convoy because — from day one — the organizers themselves are part of the far-right movement”. The Global News article identifies various individuals as the people behind the convoy, including Tamara Lich, B.J. Dichter, Jason LaFace, and Patrick King. A copy of this article is attached as **Exhibit H**. None of the Plaintiffs are subjects of this article.

19. On January 29, 2022, Salon.com published an article on its website entitled “Canada’s ‘Freedom Convoy’: Is this Jan. 6 for the Great White North?”. The article cites CAHN’s January 27, 2022 article and contains a question and answer section with Mr. Balgord. A copy of this article is attached as **Exhibit I**. None of the Plaintiffs are subjects of this article.

20. Between January 30, 2022 and February 11, 2022, Bernier Farber, CAHN’s Founding Chair Emeritus was quoted in various media articles. These articles are addressed in his affidavit tendered in the context of this motion.

21. On January 31, 2022, CAHN published an article on its website entitled “‘Freedom Convoy’ Descends on Ottawa, Throwing City Streets into Chaos”. A copy of this article is attached as **Exhibit J**. None of the Plaintiffs are subjects of this article.

22. On February 4, 2022, CAHN published an article on its website entitled “Ottawa Occupation Shows Why We Need Anti-Hate Legislation”. Among other issues addressed, the article is highly critical of the Government of Canada, one of the co-Defendants in this action with whom CAHN has been alleged to have conspired. A copy of this article is attached as **Exhibit K**. None of the Plaintiffs are subjects of this article.

23. On February 9, 2022, CAHN published an article on its website written by an individual who for security reasons chose to identify themselves only as Ian B. entitled “I Am Living Through the Ottawa Occupation”. Among other issues addressed, the article is highly critical of the Ottawa Police Service, one of the co-Defendants in this action with whom CAHN has been alleged to have conspired. A copy of this article is attached as **Exhibit L**. None of the Plaintiffs are subjects of this article.

24. On February 13, 2022, CBC Radio published an article on its website entitled “Why the word 'freedom' is such a useful rallying cry for protesters”. The article quotes Mr. Balgord on how the use of the word “freedom” has been rendered meaningless by many protesters. A copy of this article is attached as **Exhibit M**. None of the Plaintiffs are subjects of this article.

25. On February 14, 2022, CAHN published an article on its website written by Jack Farrell entitled “Former Yellow Vest Organizer Hosts Largest (and Most Perplexing) Convoy Voice Channel”. A copy of this article is attached as **Exhibit N**. None of the Plaintiffs are subjects of this article.

26. On February 14, 2022, CAHN and Mr. Balgord were cited in an article published in The Hill Times with respect to its February 4, 2022 article on why the Ottawa protests demonstrated the need for online anti-hate legislation. A copy of this article is attached as **Exhibit O**. None of the Plaintiffs are subjects of this article.

27. On February 14, 2022, the Government of Canada announced that it would be invoking the *Emergencies Act*, R.S.C., 1985, c. 22 (4th Supp.). On February 15, 2022, a regulation taken under the Act was registered: *Proclamation Declaring a Public Order Emergency*, SOR/2022-20.

Present Litigation and Plaintiff Funding

28. On or about February 14, 2024, I was made aware of a Tweet by the Defendant, Vincent Gircys, showing an image of a Notice of Action that listed CAHN and Mr. Farber as defendants.

29. I also found out that Plaintiffs' counsel had publicized the issuance of the Notice of Action on their law firm website, along with a copy of the Notice of Action.

30. On February 14, 2024, the law firm of Loberg Ector LLP, counsel to the Plaintiffs, issued a "Press Release". The Press Release announces that litigation was initiated against the "Trudeau Government" and other entities for "unjustified and unconstitutional actions", including "other defendants who participated in or promoted these actions." The Press Release provided hyperlinks to the Notice of Action, along with links to "Plaintiff Funding". A copy of the Press Release is attached as **Exhibit P**.

31. The hyperlinks to "Plaintiff Funding" brings readers to a website for an organization called "The Accountability Project", which is described as "a federal nonprofit, with a mandate to advocate for human rights, including raising funds for public interest plaintiffs and class action law suits". A copy of the homepage of that website is attached as **Exhibit Q**.

32. On the homepage, there is an embedded YouTube video entitled "The Accountability Project Launch", published on February 3, 2024, which is essentially a montage of the Ottawa protests and videoclips that appear to be taken from the Public Order Emergency Commission's proceedings into the decision to invoke the *Emergencies Act*. A hyperlink to the embedded video, also available on YouTube, is attached as **Exhibit R**.

33. The Board of Directors of "The Accountability Project" is said to be comprised of a sole-member, Dr. Regina N. Watteel. In her biography, Dr. Watteel highlights that she is the author of a book entitled "Fisman's Fraud: The Rise of Canadian Hate Science". A copy of the "About Us" page of The Accountability Project's website is attached as **Exhibit S**.

34. Under the "Beneficiaries" section of the website, the sole entity set out as a beneficiary of "The Accountability Project" is the "Cornell et al v Trudeau et al Emergencies Act damages claim Represented by Loberg Ector LLP". A copy of the "Beneficiaries" page of The Accountability Project's website is attached as **Exhibit T**.

35. Under the “Donate” section of the website, readers are invited to donate to The Accountability Project by credit card, PayPal, E-Transfer and GiveSendGo campaign. A copy of the “Donate” page of The Accountability Project’s website is attached as **Exhibit U**.

36. As of the date of signing this affidavit, the GiveSendGo campaign appears to be on hold with the following message appearing: “The Accountability Project (TAP) give send go (*sic*) campaign will be re-published again in the near future. Once the agreement has been finalized between the plaintiffs and TAP, stay tuned.” A copy of a screenshot of the GiveSendGo campaign website is attached as **Exhibit V**.

37. Subsequent to learning of the Notice of Action, I conducted a court search and discovered that two claims had in fact been issued against CAHN and Mr. Farber.

38. The first action, bearing Ottawa Court File Number CV-24-00094733 (the “**94733 Action**”), was initiated by way of Notice of Action issued on February 14, 2024. As far as I am aware, no Statement of Claim was filed in the 94733 Action.

39. The second action, bearing Ottawa Court File Number CV-24-00095074, was initiated by way of Statement of Claim issued on March 15, 2024. Although it purports to be issued after the Notice of Action issued in the 94733 Action, it bears its own file number, having been issued as a separate action.

40. Neither the Notice of Action nor the Statement of Claim were served on CAHN. I have spoken with Bernie Farber, our Founding Chair Emeritus, and he indicates that he has never been served either.

41. On April 25, 2024, legal counsel retained by CAHN and Mr. Farber sent a letter to counsel to the Plaintiffs advising of their retainer and asking to be provided with the contact information for other defence counsel. The letter is attached as **Exhibit W**.

42. On April 29, 2024, counsel to the Plaintiffs responded that “No one has been served”. A copy of this response is attached as **Exhibit X**.

43. I have no information to confirm that any of the Defendants have been served as of the date of swearing this affidavit.

Response to Specific Allegations Made in Statement of Claim

44. The Statement of Claim advances several causes of action. It is unclear to me, as a lawyer reading the Statement of Claim, which claims are specifically advanced against CAHN.

45. I have conferred with CAHN's officials, comprised of its Board of Directors and Staff, with respect to the allegations that are advanced in the Statement of Claim, and believe the information they have provided me with respect to their knowledge of these matters to be true.

46. CAHN and its officials have no knowledge of speaking with any of the other individual Defendants (or representatives of the corporate Defendants) to this action about the "Freedom Convoy", the Ottawa protests, or the invocation of the *Emergencies Act*, prior to that legislation being invoked on February 14, 2022, other than a single request for comment from the Ottawa Police Service media relations staff for an article.

47. CAHN and its officials have no knowledge of signing any contract and do not otherwise have any contractual relationship with any of the Plaintiffs.

48. CAHN and its officials have no knowledge of any contractual relationship between the Plaintiffs and the other Defendants prior to the issuance of the Statement of Claim.

49. CAHN and its officials do not hold any public office.

50. CAHN and its officials have no knowledge of having seized, disturbed, or damaged any of the Plaintiffs' chattels.

51. CAHN and its officials have no knowledge of having initiated any form of legal process against any of the Plaintiffs.

52. CAHN and its officials have no knowledge of having been in physical proximity to any of the Plaintiffs during the "Freedom Convoy" or the Ottawa Protests. They have no knowledge of any physical contact or threat of any physical contact.

53. CAHN and its officials made no threat to injure any of the Plaintiffs.

54. CAHN and its officials have no knowledge of making any untrue or malicious statement to a third party disparaging the Plaintiffs' businesses or property.

55. CAHN and its officials have no knowledge of any agreement between any of the co-Defendants to cause harm or damage to any or the Plaintiffs, or any agreement whatsoever.

56. CAHN and its officials have no knowledge of having received from any of the Plaintiffs a Notice of Libel or any other document purporting to be notice pursuant to the provisions of the *Libel and Slander Act*, R.S.O. 1990, c. L.12.

Threats Made Against CAHN and Its Officials

57. I personally obtained a peace bond in 2019 for threats made against CAHN by Canadian neo-Nazi Kevin Goudreau. On 15 March 2019, a terrorist attacked a mosque in Christchurch, New Zealand murdering 51 people. On 18 March 2019, Kevin Goudreau posted material to his Facebook account stating that in the wake of the Christchurch terrorist attack, we were in a state of Racial Holy War and suggested ‘priority targets’ for further terrorist attacks such as CSIS, the CBC, human rights commissions, and CAHN. Goudreau mentioned bullets, and recommended that any readers engaging in such attacks should:

Remember always double tap both hemispheres of the brain because some people survive a bullet to the head. Bombing is combersom and clumsy, to much potential for collateral damage of innocent people hit by shrapnel etc. [sic]

58. As a result of these threats, I applied for a s. 810 peace bond under the *Criminal Code* against Kevin Goudreau. This was granted by Justice of the Peace Goffin-Boyd in Ottawa on 12 August 2019.

59. Attached as **Exhibits Y and Z** are copies of the application for the s. 810 peace bond and also the resulting peace bond as issued.

60. My tireless fight to counter hate has resulted in numerous further threats of death or violence and other forms of retaliation.

61. In early 2015, members of the Ottawa Police Service major crimes unit interviewed me after informing me that my name had been found on what they would later describe as the ‘kill list’ of triple-murderer Ian Bush. Bush was ultimately convicted of murdering Alban Garon, former Chief Justice of the Tax Court of Canada, his wife, and their neighbour as well as the attempted murder of a 101-year-old WWII veteran.

62. I include these limited examples because it is my belief that false allegations that CAHN and/or its members are involved in conspiratorial activities in league with or at the direction of government actors exposes CAHN and its members to the risk of harm.

Prior SLAPP Litigation Against CAHN

63. CAHN has recently been the victim of another SLAPP suit. On 12 July 2023, an individual named Caryma Sa'd brought a vexatious claim in Federal Court alleging trade mark infringement against CAHN. In response, CAHN brought a successful motion to strike the claim. In his decision dated 25 September 2023, Justice Richard Southcott stated that the claim was without factual or legal merit:

[42] Again, I find the Plaintiff's pleading fatally deficient in demonstrating a reasonable cause of action and that the Plaintiff has failed to identify any amendment that might be capable of curing this deficiency.

[43] In conclusion under Rule 221(1)(a), I find that it is plain and obvious that the Statement of Claim discloses no reasonable cause of action and therefore has no reasonable prospect of success, and my Order will strike the Statement of Claim in its entirety, without leave to amend.

Attached as **Exhibit AA** is a copy of the Federal Court decision in *Sa'd v CAHN*.

64. Despite being successful in striking the vexatious claim against us, the Federal Court costs schedules are notoriously low and thus CAHN was forced to spend tens of thousands of dollars in legal fees to defend ourselves beyond what was covered by the costs award. I believe that wasting CAHN's limited staff/Board time and financial resources was an intended consequence of the meritless lawsuit against us.

Litigation Funding and CAHN's Limited Financial Resources

65. Even if the pleadings were not yet served on CAHN in accordance with the *Rules of Civil Procedure*, CAHN has no choice but to seek an early dismissal of the claim, which seeks \$44,000,000 in damages on a joint and several basis against the Defendants.

66. CAHN is a small NGO with a mandate to promote human rights and counter hate group activity in Canada and legal fees spent to defend against litigation siphon resources that should properly be funding our core activities. It is our understanding that if CAHN attempted to make an insurance claim to defend against this litigation, our existing company would not renew our policy

and we would not be successful in subsequently obtaining new insurance from another provider. CAHN does not have the resources to pay the legal fees required to defend against repeated litigation, including bringing this anti-SLAPP motion.

67. As such, in order for CAHN to bring this motion, I have had to personally put forward the legal fees and disbursements to have this litigation addressed at the outset.

68. In the event the motion fails and the action proceeds against CAHN, I am unable to commit to continue funding the expensive defence fees that would be required in this multi-party legal proceeding.

69. I believe that this is the second meritless legal action brought against CAHN within a six-month period. While CAHN continues to counter hate groups, litigation such as the present action are an important strain on the organization staff and Board time and energy as well as financial resources and have a direct and concrete chilling effect on our ability to express ourselves on these important issues.

Video of the Plaintiffs

70. In the course of preparing this affidavit, I became aware of two videos, purportedly of two of the Plaintiffs in this action, speaking about their motivation and strategy in bringing the present litigation. Copies of the videos are available at the hyperlinks attached as **Exhibits BB and CC**.

71. I swear this affidavit in support of the motion to dismiss this action pursuant to s. 137.1 of the *Courts of Justice Act* and for no other improper purpose.

SWORN REMOTELY by Richard Warman stated as being located in the city of Manama, Bahrain, before me in the city of Ottawa, Province of Ontario, on the 31st day of May, 2024, in accordance with O.Reg 431/20, *Administering Oath of Declaration Remotely*.



A Commissioner of Oaths, etc.



Richard Warman

RICHARD WARMAN

This is **Exhibit « A »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive style with a long horizontal stroke at the end.

A Commissioner of Oaths, etc.

[News](#) > **The 'Freedom Convoy' Is Nothing But A Vehicle For The Far Right**

THE 'FREEDOM CONVOY' IS NOTHING BUT A VEHICLE FOR THE FAR RIGHT

They say it is about truckers, and have raised over \$6 million dollars on GoFundMe. But if you look at its organizers and promoters, you'll find Islamophobia, antisemitism, racism, and incitements to violence.

Posted on January 27, 2022

[Facebook](#) [Twitter](#) [Copy](#) [Share...](#)

This was posted more than 12 months ago. The information may be outdated.

Canadian Anti-Hate Network



A crowd-funded convoy, ostensibly fighting against a mandate for truckers to be vaccinated, has raised over \$6 million dollars. Its two GoFundMe organizers are previously known figures in Canada's far-right ecosystem and have publicly made Islamophobic comments. Its loudest promoter, Pat King, is a racist who

image that the other organizers have even tried to put some distance between them.)

Some convoy supporters, like the Diagonon network, are even saying that they want this to be Canada's very own January 6th, referring to the attempted insurrection in Washington, DC that [led to multiple deaths](#) and [widespread arrests](#). Diagonon is an accelerationist movement, which means they believe a revolution is inevitable and necessary to collapse the current system. It's also rife with neo-Nazis.

Until January 31st, all donations to our anti-hate education program are being matched and DOUBLED. Help us give teachers tools to keep neo-Nazi recruiters away from kids at antihate.ca/donate.

Since the start of the pandemic, COVID conspiracies have been bringing various fringe and far-right elements together. The [close connections](#) between the People's Party of Canada, the young white supremacists of Canada First, and the Diagonon network is one example. This convoy is another.

The mainstream media has been very slow to report on the far-right connections, just like they were in 2019, when the far-right had their much smaller "United We Roll" convoy. Most have given them uncritical coverage, using their language, and calling it a "freedom convoy."

Now, arriving from different corners of Canada, the fleet of semi-trucks, half tonne pickups, SUVs and more than a few sedans is on its way to Parliament Hill. Many of their supporters swear this isn't about the far-right, and even, bizarrely, that they aren't anti-vaccine. Most of them probably believe it, too. But the organizers behind the convoy, and where it emerged from, paint a very different picture.

UNITED WE ROLL 2.0

The convoy draws apt comparisons to a similar, albeit less funded, protest movement held in 2019: the "United We Roll" convoy. Organized primarily by associates of the Canadian Yellow Vest movement, UWR painted a narrative of disenfranchised oil and gas workers riding their rigs cross country to force a detached and distant Ottawa to listen.

Yellow Vests Canada was largely founded by individuals already associated with Canada's far-right, which at the time was primarily united by anti-Muslim racism and Islamophobia. Excited by the protests held by France's *Mouvement des gilets jaunes*, they copied the signature uniform, name, and adopted new grievances that would get them a much larger audience. They said they were for oil and gas, and that they represented Western alienation from a distant, Liberal, Ottawa. But the Facebook groups were also full of hundreds of examples of explicit anti-Muslim racism and calls for Prime Minister Justin Trudeau's arrest and execution – a theme that remains [present among COVID-conspiracy demonstrations](#).

By the time United We Roll arrived in Ottawa, media had started to catch on. Neo-Nazi Faith Goldy spoke on a second stage. The anti-Muslim hate group [Northern Guard](#) were spotted in attendance. Christopher Hayes, who was previously [convicted of uttering threats against Justin Trudeau](#) – and who has a history of

vehicles showing up than promised, and only a few hundred participants. Demoralized, the Yellow Vests Canada movement started to die out, although some holdouts kept smaller demonstrations going for months.

The leadup to the 2022 "Freedom Convoy" is extremely similar to the leadup to UWR, and it shares many of the same organizers and participants. They're even reusing UWR promotional materials. Except this time they have the weight of the COVID conspiracy movement behind them, and \$6 million dollars. Let's dive into this new convoy's most public figures.

THE MONEY COLLECTORS

Tamara Lich and B.J. Dichter are currently listed as the organizers of the GoFundMe page. Dichter was a late addition, only added this week.

Both have interesting histories when it comes to political organizing.

Lich, born in Saskatchewan, now hails from Medicine Hat, Alberta, where she served as an organizer for *Yellow Vests Canada*, a regional coordinator for the separatist *Western Exit* or "Wexit" movement in Alberta, and now as the secretary for the *Maverick Party* – another separatist movement and fringe political party.

Attending and boosting Yellow Vest events starting in 2018, Lich social media posts from the time show her, in one moment, calling out some hateful rhetoric within the movement, while also posting Islamophobic articles of her own, like conspiracies about the "Muslim Brotherhood" operating in Canada. She shared posts from *The Clarion Project* – "[an organization that advances anti-Muslim content through its web-based and video production platforms](#)" – as well as the deeply conspiratorial and, once again, anti-Islamic podcast *The Quiggin Report*, hosted by [dubious security "expert" Tom Quiggin](#).

Lich heavily promoted Quiggin's 2019 "Alberta tour" saying it was an "absolute honour to have hosted" him during his stay in Medicine Hat.



Tamara Lich pictured with Tom Quiggin. Source: Facebook

"The *Progressive Conservative Party of Ontario* is now just like the Liberal Party or the NDP. They are suffering from political entryism," Quiggin said in an episode criticizing Member of Provincial Parliament Khalid Rasheed, a Muslim man. "They have members in their party who are ... there to advance the cause of a foreign ideology. So either Progressive Conservative Party takes a very hard look at itself now or faces a future where extremism becomes normalized within the party."

Lich shared the episode with the comment, "Canadians, are you paying attention yet? ... We do not want the Muslim Brotherhood in Canada."

Scrutiny of the convoy has increased, which [according to the Canadian Press](#), briefly resulted in the crowdsourcing website freezing donations. Shortly thereafter, one-time Conservative Party of Canada candidate, People's Party of Canada booster, and co-founder of the podcast network *Possibly Correct*, Benjamin "BJ" Dichter appeared as a co-organizer on the GoFundMe page.

Dichter's website shares *The Quiggin Report*, and Dichter himself shares similar Islamophobic sentiments in public. In 2019 he claimed that "Islamist entryism" is "rotting away at our society like syphilis."



Benjamin Dichter giving a speech at a People's Party of Canada conference in Quebec. Source: YouTube

"[The Conservative Party of Canada] is suffering from the stench of cultural relativism and political Islam," he said during the first PPC conference held in Gatineau, Quebec. "It is suffering from the stench of extremism that same way in third-world countries suffer from extremist groups, separatist groups, communist guerrilla factions, paramilitaries, organized crime, and more."

PAT KING IS SO TOXIC HE'S (SORT OF) DISAVOWED

Patrick King – another former Yellow Vester, one-time major figure in the Wexit movement as well as United We Roll – is listed as the contact to join the "Alberta North" portion of the convoy. A conspiracy theorist and streamer, King made headlines when he and supporters confronted members of an anti-racist rally in Red Deer, Alberta. Several instances of violence occurred during this event, including against an individual who attempted to serve King with a restraining order.

"Black Lives Matter and Antifa are planning a huge rally to disrupt our community [sic]," he said at the time. "Help support us to help drive out these left-wing anarchists that are trying to disrupt communities and trying to threaten people."

He also drew attention after a [wild misinterpretation of court documents](#) led to him claiming he forced Alberta to abandon its public health lockdowns.

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In the past King has gone on record about his feelings about the “Anglo-Saxon replacement,” that plans to “flood [Canada] with refugees,” and subvert the education system -- a thin rebranding of the great replacement theory touted by ethnonationalists.

At other points, King has expressed overtly racist and antisemitic statements. In a 2019 stream about the then-upcoming federal election King complained that he had to leave the movement due to their lack of success: “[The election] won’t matter...unless you want to change your national language to Chinese or Mandarin or Hebrew,” and going on to compare Chinese names to the sound of change falling down stairs.

YVCE 🏆🏆🏆🏆 - ARCHIVE



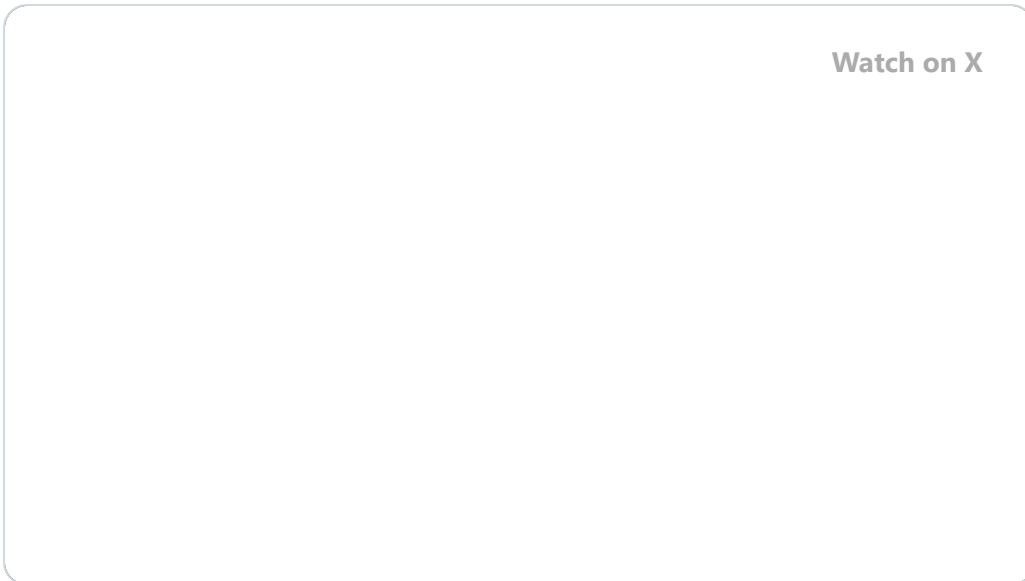
@VestsCanada · Follow

Pat King put out an unremarkable live that isn't worth coverage except for this bit, where he goes full antisemitic & racist.

[#YellowVestsCanadalsAHateGroup](#)

Reminder to media that this is who Wexit and PFM organizer Peter Downing associates with.

[#cdnmedia](#) [#cdnpoli](#) [#elx43](#)



1:18 PM · Sep 28, 2019



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He's publicly distorted established facts about the Holocaust – [a form of Holocaust denial](#) – saying, "I do know that the Holocaust [sic] was reduced to 1.5 million and not the 6 million that it was said to be." He then invoked the antisemitic conspiracy theory that the Jewish people are secretly in control of world governance, media, and finances: "The questions have been asked several times to the ADL and the Jewish government and communities. We have Jewish world [bankers] who are dictating our government policies and controlling our Politicians."

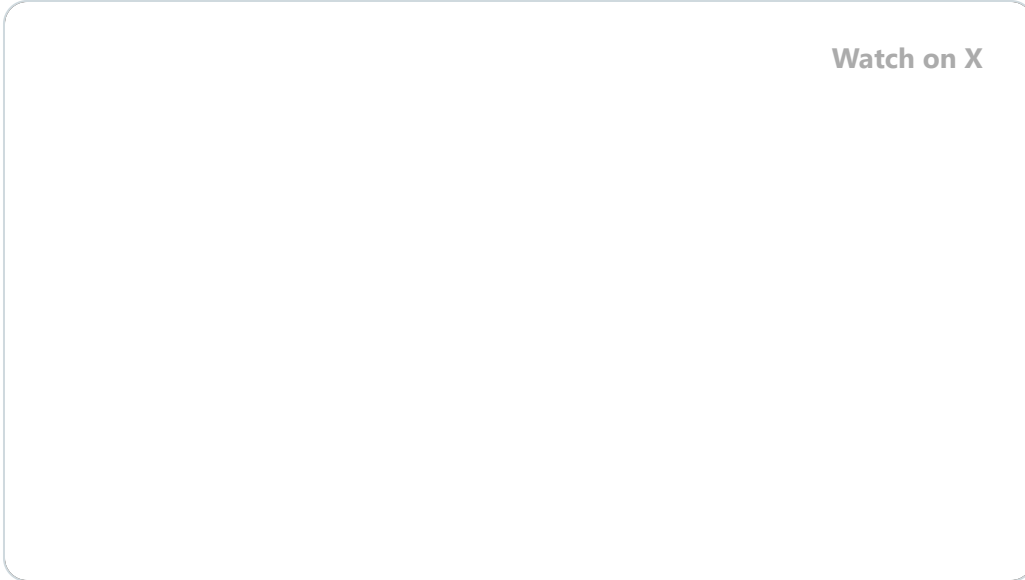
YVCE 🏆🏆🏆🏆 - ARCHIVE



@VestsCanada · Follow

Pat King recorded a livestream after the rally in Red Deer yesterday. As usual it was really lame, although he does hint that he's interested in holocaust denial.

/1



7:49 PM · Sep 22, 2020



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THE EXTREMISTS ARE COMING

Over the last week, King has made numerous livestreams to social media, frequently stating he is conducting his own crowdfunding for the trip and is not benefiting from the GoFundMe. King’s involvement led to some initial tension among those interested in supporting the convoy, but who were not enthused about what they perceived as potentially enriching King through the larger fundraiser. Among this group was Diagonol concept creator and far-right streamer [Jeremy “Raging Dissident” MacKenzie](#).

Banned from several platforms, MacKenzie once told his audience to read a piece of neo-Nazi fiction called *Day of the Rope*. MacKenzie defends his endorsement by saying it’s about murdering pedophiles. In the book, all these pedophiles just so happen to be Jewish. The title of the book is taken straight from a chapter title in the infamous neo-Nazi novel *The Turner Diaries*, in which “race-traitors,” like people in interracial relationships, politicians, and journalists, are strung up on the streets. The novel is regularly found on mass murderer’s desks or bookshelves. “Gun or rope” is MacKenzie’s slogan.

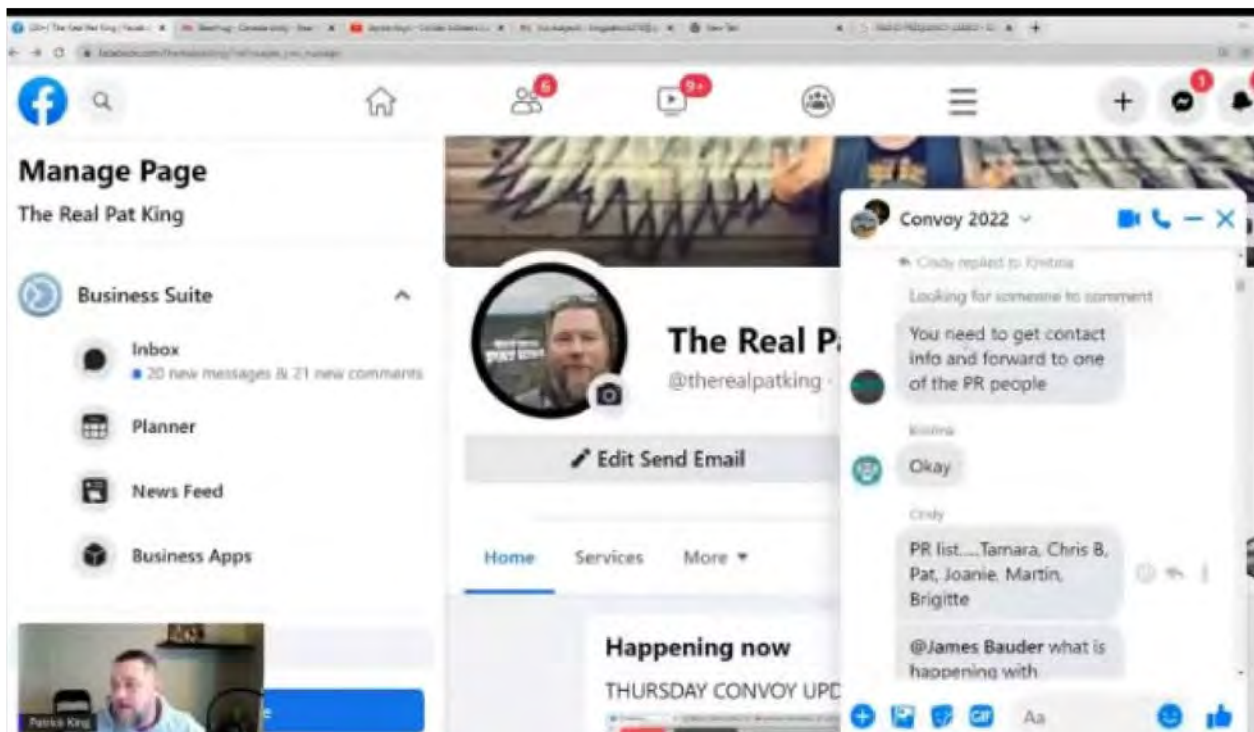
streamer Derek Harrison is wishing for the opposite. "I would like to see our own January 6th event," [he says in a live stream](#), "see some of those truckers plow right through that 16-foot wall."

Since massive public attention has thrust the convoy into the spotlight, MacKenzie and many of his followers now plan to attend the Ottawa protest. However, MacKenzie had previously exited an organizing group on the chat app Telegram when he saw Pat King was involved.

MacKenzie is a retired combat veteran with the Canadian Armed Forces, and his animosity towards Pat King may be about stolen valour. King still faces accusations that he presented himself as a former military member, before later releasing a video where he appears to apologize for the claim.

The controversy around King resulted in a statement being released onto the fundraising page saying: "King is not and never has been affiliated with our movement nor has he been a part of our great team of volunteers."

This update appears to have since been deleted, and King claimed in a later video that the statement was a public relations move because he was being attacked online. In a previous live stream, King also scrolled through a private Facebook chat titled "Convoy 2022" and appears to contain Lich, Canada Unity president James Bauder, and others discussing organizational details about the convoy. King remains listed as a contact on the *Unity Canada* website.



TRUCK DRIVER ASSOCIATIONS CONDEMN THE CONVOY

Initially, the issue addressed by the convoy was narrowly focused on the vaccine mandates for truck drivers who would be required to cross the US-Canada border as part of their work.

like they just want to be heard and this is the way they've been doing it for years," Jean-Marc Picard, executive director for the Atlantic Provinces Trucking Association, told CTV News during an interview.

Likewise, the Canadian Trucking Alliance issued a statement saying it does "not support and strongly disapproves of any protests on public roadways, highways and bridges." The CTA's president also followed up more recently in a [joint statement with the ministers of labour and transport](#).

"The Government of Canada and the Canadian Trucking Alliance both agree that vaccination, used in combination with preventative public health measures, is the most effective tool to reduce the risk of COVID-19 for Canadians, and to protect public health," it reads.

[The CTA told the CBC](#), that the mandate could impact 12,000 to 16,000 Canadian commercial drivers – around 10 to 15 per cent of the industry's cross-border drivers.

Tamara Lich and Benjamin "BJ" Dichter did not respond to requests for comment. This article previously stated that Benjamin Dichter was not a truck driver. That line has been removed and we regret this error.

LATEST NEWS



May 23, 2024

"WHITE NATIONALIST" IN CONFERENCE CALL WITH NEO-NAZIS

In the recording, Bethan Nodwell denied the Holocaust, remarked how her relationship with her Jewish business partner with Trinity Productions had become strained, and claimed that "white identitarianism is inevitable."



May 16, 2024

DONALD TRUMP JR. CALLS TRANS PEOPLE "MOST VIOLENT GROUP" WHILE IN TORONTO

Speaking during an event marketed as being about opposition to an internet censorship bill, the son of the former US president used his speech to cast transgender people as violent and dangerous.



May 15, 2024

ALBERTA CONSERVATIVES HOSTING DISCREDITED DOCTORS IN TOWN HALL EVENT

A now-deleted ticket page for the event reads, "Ask yourself, how can we help Albertans put a stop to COVID shots that kill children?"

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5/31/24 9:26 AM

The 'Freedom Convoy' Is Nothing But A Vehicle For The Far Right - Canadian Anti-Hate Network

Electronically filed / Déposé par voie électronique : 31-May-2024
Ottawa Superior Court of Justice / Cour supérieure de justice

Court File No./N° du dossier du greffe : CV-24-00095074-0000

info@antihate.ca



This is **Exhibit « B »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive style with a horizontal line underneath it.

A Commissioner of Oaths, etc.



© This article is more than 7 years old

Manning Centre hosts 'bonkers' panel claiming Quebec City mosque was actually helping terrorists

The Manning Centre's "expert on terrorism" has been repeatedly criticized by real experts on terrorism.

by **PressProgress**
February 28, 2017



(<https://www.pressprogress.ca/atip>)

This is the Manning Centre's go-to "expert on terrorism"?

At this weekend's Manning Centre Conference in Ottawa, one of the right-wing think tank's "expert" panelists suggested a Quebec City mosque, attacked by a man who held far-right anti-immigration views (<http://www.theglobeandmail.com/news/national/quebec-city-mosque-attack-suspect-known-for-right-wing-online-posts/article33833044/>) last month, had links to terrorist entities – a claim that has never been alleged by police or other national security officials.

<https://www.manningcentre.ca/thomas-quiggin>) despite having been widely criticized by recognized experts in the same field, delivered a speech at the 2017 Manning Conference's panel titled "leading the response to Islamist extremism and its ideology in Canada."

After acknowledging the attack that [left six Muslim congregants dead](http://www.theglobeandmail.com/news/national/quebec-city-mosque-shooting-what-we-know-so-far/article33826078/) (<http://www.theglobeandmail.com/news/national/quebec-city-mosque-shooting-what-we-know-so-far/article33826078/>) was "a horrific thing," Quiggin proceeded to tell the audience that he believes the mosque was likely targeted because it funneled "tens of thousands of dollars" to a "terrorist entity."

Manning Centre speaker claims "tens of thousands of dollars" from Quebec City mosque attacked last month went to terrorist entities #mcc2017 (<https://twitter.com/hashtag/mcc2017?src=hash>)
pic.twitter.com/wOc2U2w17S (<https://t.co/wOc2U2w17S>)

— PressProgress (@pressprogress) February 24, 2017
(<https://twitter.com/pressprogress/status/835161078900326401>)

What proof does the Manning Centre's "expert on terrorism" offer to back up his claims?

According to a January [blog post](http://tsecnetwork.ca/2017/01/30/terrorist-shooting-at-muslim-brotherhood-mosque-shining-the-light-on-intelligence-government-and-the-muslim-brotherhood/) (<http://tsecnetwork.ca/2017/01/30/terrorist-shooting-at-muslim-brotherhood-mosque-shining-the-light-on-intelligence-government-and-the-muslim-brotherhood/>) on Quiggin's website, the so-called "expert" bases his entire thesis on a 1992 phone book, a website that the New York Times recently labelled an "anti-muslim" conspiracy theory blog (https://www.nytimes.com/2017/01/31/world/americas/canada-quebec-nationalists.html?_r=0) and a methodology that at times seems loosely inspired by [Six Degrees of Kevin Bacon](https://en.wikipedia.org/wiki/Six_Degrees_of_Kevin_Bacon) (https://en.wikipedia.org/wiki/Six_Degrees_of_Kevin_Bacon).

If that isn't a serious red flag, here's what [Maclean's magazine](http://www.macleans.ca/politics/ottawa/at-the-manning-conference-an-alarming-view-of-islam/) (<http://www.macleans.ca/politics/ottawa/at-the-manning-conference-an-alarming-view-of-islam/>) had to say about the Manning Centre expert's credentials this weekend:

"Thomas Quiggin, a self-styled security and terrorism expert who runs the Terrorism and Security Experts network ... Quiggin's various research conclusions and work with the obscure TSEC Network have been vehemently criticized by acknowledged security and terrorism experts."

And calling the whole panel "bonkers," here's what the National Post [thought about](http://news.nationalpost.com/full-comment/chris-selley-conservatives-need-pressure-release-on-islamic-extremism-but-manning-panel-on-terrorism-was-bonkers) (<http://news.nationalpost.com/full-comment/chris-selley-conservatives-need-pressure-release-on-islamic-extremism-but-manning-panel-on-terrorism-was-bonkers>) Quiggin's Manning Conference remarks:

... *journalist* *Quiggin* of the *terrorism and security experts network* *then* *talked* *through* *a* *deck* *of* *slides* *that* *would* *have* *left* *an* *uninformed* *viewer* *thinking* *most* *every* *mosque* *in* *Canada* — *including* *the* *Islamic* *Cultural* *Centre* *in* *Quebec* *City*, *site* *of* *the* *massacre* — *was* *funnelling* *funds* *to* *extremist* *groups* ... *He* *suggested* *intelligence* *officials* *should* *have* *known* ... *that* *the* *mosque* *was* *supporting* *extremists*, *and* *that* *the* *gunman* *was* *intending* *to* *take* *his* *revenge* — *Quiggin* *suspects* — *for* *that* *support*.”

Meanwhile, the [National Council of Canadian Muslims](https://www.nccm.ca/engfre-nccm-statement-about-document-alleging-extremist-literature-in-canadian-muslim-institutions/) (<https://www.nccm.ca/engfre-nccm-statement-about-document-alleging-extremist-literature-in-canadian-muslim-institutions/>) has flagged Quiggin’s work as “shoddy research,” noting Quiggin’s “record of promoting discredited, conspiratorial ideas about Canadian Muslims and their institutions.”

Plus one national security expert at Carleton University describes Quiggin as a guy “[in a basement reading Breitbart](https://twitter.com/StephanieCarvin/status/768086092453179392).” (<https://twitter.com/StephanieCarvin/status/768086092453179392>)

The Manning Centre had come under fire before the conference for advertising its panel on “Islamist extremism” with an [image of a ticking time bomb](https://www.pressprogress.ca/manning_centre_promotes_upcoming_conference_with_photo_of_a_ticking_time_b) (https://www.pressprogress.ca/manning_centre_promotes_upcoming_conference_with_photo_of_a_ticking_time_b)

Disgusting regardless of timing, but following terrorist attack on Quebec mosque & death of six humans, this is abhorrent. #ableg (<https://twitter.com/hashtag/ableg?src=hash>) *#cdnpoli* (<https://twitter.com/hashtag/cdnpoli?src=hash>) pic.twitter.com/WslWmDCfXA (<https://t.co/WslWmDCfXA>)

— *Kathleen Smith (@KikkiPlanet)* [February 6, 2017](https://twitter.com/KikkiPlanet/status/828632149809041411) (<https://twitter.com/KikkiPlanet/status/828632149809041411>)

If the Manning Centre is interested in “leading the response” to extremism, maybe they could start leading by example?

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A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive style with a horizontal line extending from the end of the name.

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(ENG/FRE) NCCM STATEMENT ABOUT DOCUMENT ALLEGING EXTREMIST LITERATURE IN CANADIAN MUSLIM INSTITUTIONS

(Ottawa, August 23, 2016) This document is not a serious piece of analysis concerning Canadian Muslim communities. Media outlets and journalists should be aware of its misleading nature. The document is yet another anecdotal attempt to vilify Canadian Muslims and their institutions during these difficult times. Indeed, one of the writers of this so-called “report” has a [record](http://www.macleans.ca/news/world/the-muslim-brotherhood-the-new-islamist-bogeyman-in-canada/) (<http://www.macleans.ca/news/world/the-muslim-brotherhood-the-new-islamist-bogeyman-in-canada/>) of promoting discredited, conspiratorial ideas about Canadian Muslims and their institutions.

The document is an exercise in shoddy research and is based entirely on “visits” to four Ottawa-area mosques and three other Islamic institutions. Despite these methodological flaws, the “report” generalizes about Canadian mosques and Islamic institutions. It contains nonsensical observations, not empirical analysis. For example, the document says “many of those present during the visits to the [mosque] libraries seemed sullen and sometimes angry.” This exercise clearly does not qualify as a credible study by any objective standard. It further makes false statements about Canadian Muslim organizations by inaccurately labelling them “fronts for the Muslim Brotherhood”.

authorities. Otherwise, this is nothing more than an attempt to sow fear and distrust towards Canadian Muslim communities without any evidence of wrongdoing or proper context. Such writing only fans the flames of ignorance at a time when vandalism of mosques and hate incidents against Canadian Muslims are increasing (<http://globalnews.ca/news/2634032/hate-crimes-against-muslim-canadians-more-than-doubled-in-3-years/>).

If there is problematic material in any mosque or institution's library, it should be brought to the attention of the administrators.

Canadian Muslims and their institutions continue to work for the betterment of their communities and Canadian society. Such "reports" attempt to minimize the very real and positive role that mosques and institutions play in Canada. Blood drives, organizing food banks and raising funds for hospitals and charities, as well as a variety of other initiatives across the country, are part and parcel of Muslim institutions in Canada.

Moreover, Canadian Muslims have repeatedly and categorically rejected terrorism and violent extremism in all their forms and will continue to do so while working in partnership with others to help ensure Canada remains safe and secure for all.

DÉCLARATION DU CNMC SUR UN DOCUMENT QUI ALLÈGUE QUE DES INSTITUTIONS MUSULMANES CANADIENNES RENFERMENT DE LA LITTÉRATURE EXTRÉMISTE

(Ottawa – 23 août 2016) Le document en question n'est pas une analyse sérieuse relative aux communautés musulmanes canadiennes. Les médias et les journalistes devraient être conscients de la nature trompeuse de cette énième tentative anecdotique de diffamer les musulmans canadiens et leurs institutions durant cette période difficile. D'ailleurs, l'un des auteurs du soi-disant « rapport » n'en est pas à sa première théorie du complot farfelue (<http://www.macleans.ca/news/world/the-muslim-brotherhood-the-new-islamist-bogeyman-in-canada/>), sur les musulmans canadiens et leurs institutions.

graves lacunes méthodologiques, le rapport se permet des généralisations sur toutes les mosquées et institutions islamiques du Canada. Ses observations aberrantes – par exemple, le fait que « de nombreuses personnes présentes durant nos visites de la bibliothèque d’une mosquée semblaient moroses, voire fâchées » – n’ont rien des résultats d’une analyse empirique. Aucune norme objective ne saurait qualifier cette étude de crédible. Par ailleurs, le document avance erronément que certains organismes musulmans canadiens seraient des « façades des Frères musulmans ».

Si les auteurs du document détiennent des preuves d’une activité criminelle, par exemple la promotion du terrorisme et de l’extrémisme violent, ils devraient en aviser immédiatement la police. Dans le cas contraire, leur démarche n’est rien d’autre qu’une incitation à la peur et à la méfiance à l’égard des communautés musulmanes du Canada, sans justification ni contexte. Leurs écrits ne font qu’attiser l’ignorance et risquer d’aggraver la recrudescence actuelle (<http://globalnews.ca/news/2634032/hate-crimes-against-muslim-canadians-more-than-doubled-in-3-years/>) du vandalisme de mosquées et autres crimes haineux visant les musulmans canadiens.

Si la bibliothèque d’une mosquée ou d’une institution musulmane contient des documents problématiques, c’est aux administrateurs de l’endroit qu’il faut en parler.

Les musulmans canadiens et leurs institutions œuvrent sans cesse à améliorer leur communauté et la société canadienne. Les rapports diffamatoires que nous dénonçons ici tentent de minimiser le rôle positif réel que jouent les mosquées et les institutions musulmanes au Canada, notamment les collectes de sang, les banques d’alimentation, les campagnes de financement pour des hôpitaux et des organismes caritatifs, et autres initiatives ayant lieu partout au pays.

Enfin, la communauté musulmane canadienne a condamné maintes fois et sans réserve le terrorisme et l’extrémisme violent sous toutes leurs formes, et continuera à le faire en partenariat avec ses alliés en vue de promouvoir la sécurité de toute la population canadienne.

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A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive style with a long horizontal stroke at the end.

A Commissioner of Oaths, etc.

At the Manning Conference, an alarming view of Islam

A panel on 'Islamist Extremism' in Canada offered up some spurious claims, but found an audience at the Conservative event

SHANNON PROUDFOOT

 <p>Protesters demonstrate during a Pegida Canada rally at Queens Park in Toronto, Canada on September 19, 2015. Pegida Canada is an organization that aims to stop the Islamization of the west. (Reynaldo Vasconcelos/CP)</p>

Protesters demonstrate during a Pegida Canada rally at Queens Park in Toronto, Canada on September 19, 2015. Pegida Canada is an organization that aims to stop the Islamization of the west. (Reynaldo Vasconcelos/CP)



FEBRUARY 24, 2017

conservatives, opened in Ottawa on Friday morning with a panel discussion that sounded a stark note of alarm, with a contrarian streak: Islamic extremism exists in Canada, and to believe otherwise is dangerous naiveté.

The discussion was billed as “Leading the Response to Islamist Extremism and its Ideology in Canada,” one of the break-out sessions planned by the Manning Centre, which provides research, training and networking for Canadian conservatives.

The morning panel featured Raheel Raza, president of the Council for Muslims Facing Tomorrow, which describes its mission as “oppos(ing) extremism, fanaticism and violence in the name of religion,” and Thomas Quiggin, a self-styled security and terrorism expert who runs the Terrorism and Security Experts network.

MORE: Kady O’Malley’s view of the Ma Conference

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intense and sometimes incredulous advance interest. “I’ve had some reporters call and ask me very innocently, ‘Why a panel on Islamist extremism?’ as though the problem doesn’t exist in Canada, just like our current government seems to believe,” she said. Hiding from reality is a mistake in dealing with “the global jihadist insurgency,” she admonished.

Raza described her years growing up in Pakistan as very different from today: pluralistic, egalitarian, with few women veiling themselves. That began to change through the 1970s, and by 1988, her family fled for the secular openness and equality of Canada, she said—only to then feel the same forces rising around them. “During the course of our settlement process, we had the uneasy feeling that the rise in extremism that we had run away from and that we had left behind was slowly creeping into the west, and in Canada as well,” Raza said.

She cited doctored copies of the Koran now distributed in downtown Toronto, statistics on Muslims who express survey support for various aspects of Sharia law and a Toronto-area school board holding Friday prayers and allowing students to take time out of class to pray. She criticized M-103, the private member’s motion that aims to tackle Islamophobia in Canada. “This is of great concern to me as a Muslim, because it gives the impression that there is institutionalized and constant racism against Muslims in Canada,” she said.

When it was Quiggin’s turn at the microphone, he outlined the two camps he believes are engaged in the “global struggle for the soul of Islam.” On one hand are “modernist, humanist, secular Muslims who are trying to take Islam, infuse it with democracy and science and drive it into the future,” he said. On the other are “the Islamists: those people who seek an unceasing, violent struggle which essentially wants to drive Islam into the past,” he argued.

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He identified the Muslim Brotherhood as the key global driving force behind the latter, and traced the tentacles of its supposedly powerful influence in Canada. He claimed these include the Muslim Students Association, which has chapters at many Canadian colleges and universities. Quiggin described its umbrella organization on Friday as a “front group” originally founded by members of the Muslim Brotherhood. By way of supporting his claims, he mentioned a half-dozen Canadians who had been charged, convicted or alleged to have participated in terror attacks, or who were missing and presumed to be involved with ISIS, and had at one point belonged to chapters of the MSA.

One of these student associations came under [scrutiny](#) after a handful of former members were arrested for terror-related offences. There is no evidence supporting his broader claims.

Quiggin also said that during an awareness week in 2015, the MSA at York University handed out a booklet about women in Islam, which included a chapter on “wife disciplining”—a phrase that drew disbelieving chuckles from the crowd—that recommended physical abuse. There is at least one photo on the MSA’s Facebook page of the book in question – whose full

displayed on a table at one of the organization's events.

However, Quiggin's various research conclusions and work with the **obscure** TSEC Network have been vehemently criticized by acknowledged security and terrorism experts.

He also attempted to draw an entirely spurious link to Iqra Khalid, the Liberal MP who put forth the private member's motion against Islamophobia, saying she had been president of an MSA chapter when she was a student. Leaving a verbal question mark hanging in the air, he prompted the audience to guess where she had gone to school, before confirming the answer: York University.

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He then linked the massive child sexual exploitation ring in the British city of Rotherham—which victimized some 1,400 young girls and was covered up for years before five British-Pakistani men were charged in 2010—to political correctness run amok. He based that conclusion on comments from the MP representing Rotherham, who spoke of “a culture of not wanting to rock the multicultural community boat.” When Quiggin read that quote from the stage on Friday, a well-dressed woman of about 50, sitting next to a young teenage boy in the audience, gasped in disgust and shook her head repeatedly.

Quiggin touched on a point that Raza had made as well, questioning why public schools in the Toronto area—he claimed 17 or 18 high schools in Mississauga do this, along with others—hold Friday prayers and, he claimed, segregate girls from boys. In fact, it appears Quiggin is conflating one unrelated example—in which a private Islamic religious school **separates** boys and girls for prayers—with 17 Mississauga public

students to write their own sermons for prayers rather than requiring them to be approved by administration.

But regardless of his inaccuracies and misleading connections, Quiggin's arguments seemed to resonate with at least a segment of the Manning Centre audience. They indulged him by turns with disapproving murmurs and incredulous gasps as he theatrically laid out the supposed creeping influence of Islamist extremism in Canada.

As Quiggin worked himself into high dudgeon over what he claimed was the Islamization of Canada's public schools, out in the audience, the 50-ish woman once again sighed and shook her head in disgust.

TAGS: EDITOR'S PICKS ISLAMOPHOBIA MANNING CONFERENCE 2017 RAHEEL
RAZA THOMAS QUIGGIN

This is **Exhibit « E »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive style with a long horizontal stroke at the end.

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SHORT ANSWER

News | The Far Right

Canada's trucker protests: What is going on?

Prime Minister Justin Trudeau invokes emergency powers, but truckers pledge to maintain protest until COVID curbs lifted.



By **Al Jazeera Staff**

28 Jan 2022



Hundreds of Canadian truckers and their supporters have maintained a protest in the Canadian capital for more than two weeks in anger about coronavirus restrictions.

The so-called “Freedom Convoy”, which began arriving in Ottawa in late January, was formed in response to a vaccine mandate requiring truckers to be

Canada and the United States.

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'What next?': Experts in Canada alarmed by anti-Trudeau protests

On the front lines of 'the war within Canada's borders'

Has Canada failed its Indigenous population?

Canada's homegrown Islamophobia

But observers and experts have pointed out that some organisers of the event, as well as some of its most vocal backers, have espoused anti-Semitic, Islamophobic, and racist views – and authorities had [cautioned](#) that the movement could turn violent.

“The ‘Freedom Convoy’ is nothing but a vehicle for the far-right,” [according](#) to the Canadian Anti-Hate Network, a non-profit that monitors hate groups. “They say it is about truckers ... but if you look at its organizers and promoters, you’ll find Islamophobia, antisemitism, racism, and incitements to violence.”

Since a large rally on Parliament Hill on January 29, convoy participants also erected blockades of key crossings along the US-Canada border, and Canadian Prime Minister Justin Trudeau [invoked](#) a never-before-used emergency order in an effort to help law enforcement quell the protests.

Here is a look at what’s going on:

First, what is the vaccine mandate for truckers?

Starting on January 15, Canada has [required](#) essential service providers previously exempt from vaccination requirements, including truck drivers, to be fully vaccinated to cross the land border from the US. “Unvaccinated Canadian truck

and Day 8 testing, as well as quarantine requirements,” it said.

The US has also imposed a similar requirement on its side of the border; as of January 22, non-citizens travelling to the US for both essential and non-essential reasons [need to show](#) proof of vaccination at land border crossings.

How many Canadian truckers are unvaccinated?

The Canadian Trucking Alliance (CTA), a federation of provincial trucking associations, has said a “vast majority” of Canadian truckers are vaccinated – [approximately 85 percent](#) – in line with vaccination rates among the general Canadian population.

Almost 90 percent of Canadian truckers are vaccinated, Transport Minister Omar Alghabra [said](#).



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The CTA has distanced itself from the convoy, [saying](#) it “does not support and strongly disapproves of any protests on public roadways, highways, and



Supporters of the convoy gather in Toronto, Ontario, on January 27, 2022 [Carlos Osorio/Reuters]

How many people are participating in the convoy?

Thousands of people participated in a rally on Parliament Hill on January 29.

Since then, several hundred truckers have remained parked near parliament. Residents have denounced the protesters for threatening people, honking their horns, and setting off fireworks late at night. Many have called the continuing protest an “[occupation](#)”.

What do organisers say the convoy is about?

The convoy was organised under the banner, “Freedom Convoy 2022”.

friends, came to the decision that the Government of Canada has crossed a line with implementing Covid-19 vaccine passports and vaccine mandates,” the group said in a [statement](#) shared on Facebook.

“We are taking our fight to the doorsteps of our Federal Government and demanding that they cease all mandates against its people,” reads a GoFundMe [page](#) in support of the convoy, which has raised approximately \$5.5m (more than seven million Canadian dollars) to date.

CBC News [reported](#) on January 28 that at least one-third of those donations came from anonymous donors or were attributed to fake names.

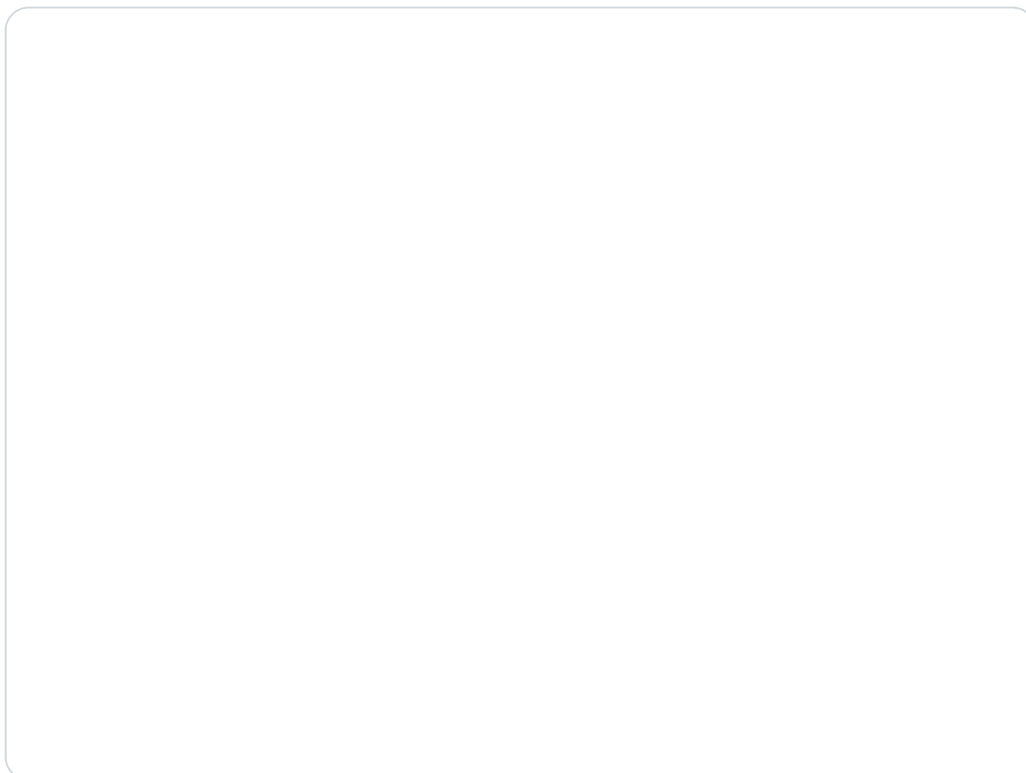
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⚠️ TRUCK CONVOY UPDATE ⚠️

The convoy with support vehicles is currently departing [#ygc](#), predominantly at Gardiners Rd and Centennial Dr. View from Gardiners Rd just north of the INVISTA Centre. Please avoid. Also, be careful of pedestrians at other overpasses.



8:47 AM · Jan 28, 2022



32



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So the convoy is really about Canada's COVID policies?

“This is no longer about the mandate any more,” said Jason LaFace, whom CityNews described as the convoy’s main organiser in Ontario. “This is about Canada, this is about our rights and how the government’s been manipulating the population and oppressing us all the time,” said LaFace, who is not a trucker.

government's pandemic policies, experts have pointed out that known far-right activists that have espoused racist views are among the organisers.

Some participants also openly expressed hardline views. "I advocate civil war," Jim Doerksen, a convoy supporter, [told Global News](#) in Saskatoon, Saskatchewan, in central Canada. "If people don't want to stand up, we've got guns – we'll stand up and we'll bring 'em out."

Canadian media have also [reported](#) on a widely shared video posted on social media that showed one convoy supporter saying that he would "like to see our own January 6 event" – a reference to the [deadly riot at the US Capitol building](#) on January 6, 2021.

Barbara Perry, a professor at Ontario Tech University and director of the Centre on Hate, Bias and Extremism, said "this protest against a mandate – a specific mandate within a specific industry – has then been laid over with anti-vax sentiment, anti-lockdown sentiment, [anti-government sentiment](#) – and then even beyond that, the far-right [is] coming into play".

"They call themselves the 'Freedom Convoy' so I think that says something about the breadth of the concerns that are brought under the umbrella," Perry told Al Jazeera. "That is also the language of anti-staters. It's also the language of the far right ... It really is part of this broader trend of a convergence of the far right with conspiracy theorists and other kinds of grievances."

Who are the far-right leaders involved?

The organisers listed on the GoFundMe page – which the company [took down](#) for violating its terms of service – are Tamara Lich and BJ Dichter.

Yellow Vests Canada, a regional coordinator for the separatist Western Exit or ‘Wexit’ movement in Alberta, and now as the secretary for the Maverick Party – another separatist movement and fringe political party”.

Lich has posted “conspiracies about the ‘Muslim Brotherhood’ operating in Canada”, the network said, while it pointed out that Dichter also has made Islamophobic comments. In 2019, at a national convention for the far-right People’s Party of Canada (PPC), Dichter [said](#), “Despite what our corporate media and political leaders want to admit, Islamist entryism and the adaptation of political Islam is rotting away at our society like syphilis.”

Patrick King, listed as a contact for the North Alberta group participating in the convoy, has [regularly](#) espoused anti-Semitic views on social media. “He’s publicly distorted established facts about the Holocaust ... then invoked the anti-semitic conspiracy theory that the Jewish people are secretly in control of world governance, media, and finances”, the Canadian Anti-Hate Network said.

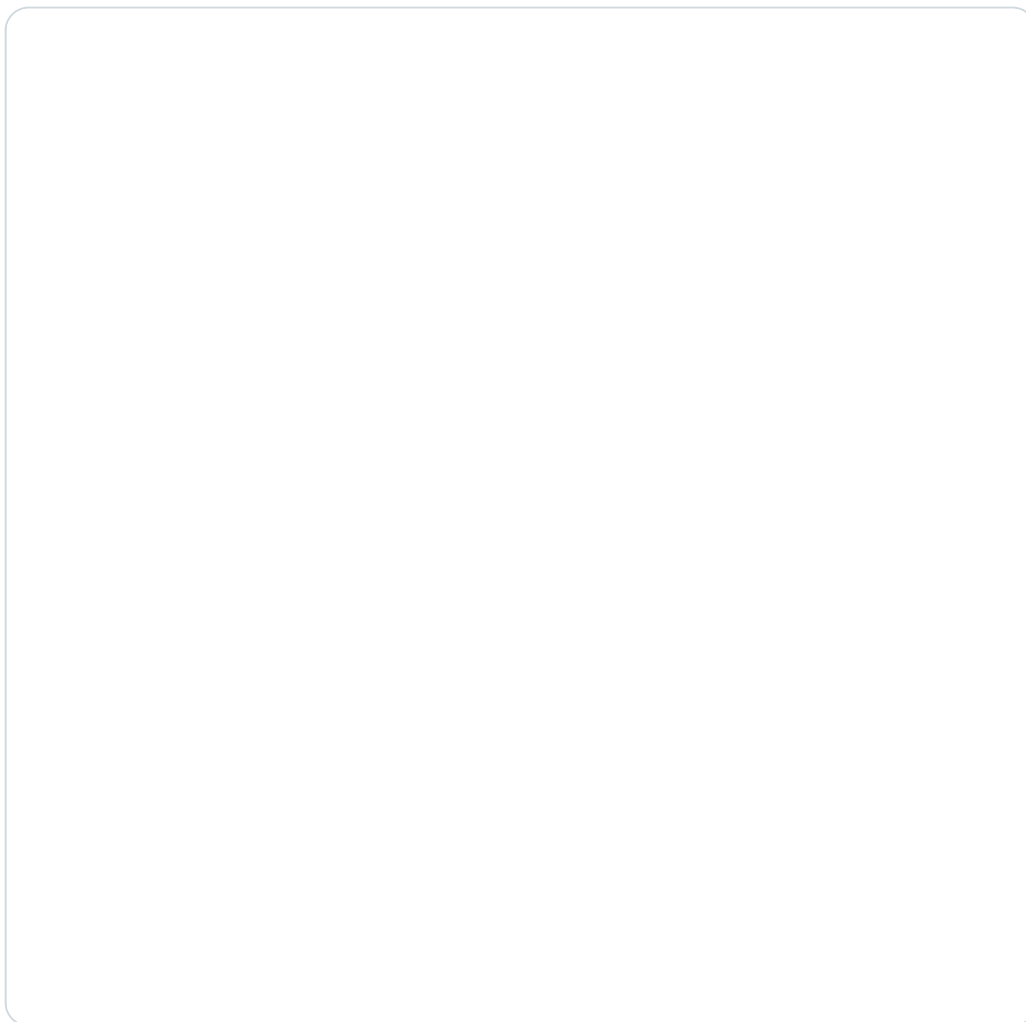
King said in December, “The only way that this is going to be solved is with bullets.”

Theo Moudakis



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Please enjoy my [#TruckerConvoy2022](#) cartoon for Thursday's [@TorontoStar](#)



4:01 PM · Jan 26, 2022



10.1K



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What have Canadian politicians said?

Prime Minister Justin Trudeau [said](#) in late January that “the small fringe minority of people who are on the way to Ottawa, or who are holding unacceptable views that they are expressing, do not represent the views of Canadians”.

On February 14, Trudeau [invoked the never-before-used Emergencies Act](#), which grants the government special power to impose restrictions and bolster local police agencies in response to the protests.

“We cannot and will not allow illegal and dangerous activities to continue,” Trudeau said during a news conference, stressing that the measures would be time-limited, geographically specific, and proportionate to the threat. “This is about keeping Canadians safe, protecting people’s jobs and restoring confidence in our institutions,” he added.

Jagmeet Singh, leader of the New Democratic Party, initially said he was concerned “by the dangerous rhetoric” in the convoy. In February, as the protest dragged on, he also questioned Trudeau’s role: “The prime minister of one of the wealthiest countries in the world, can’t make sure people are safe in the nation’s capital?” Singh asked in a video shared on Twitter. “We need to immediately seek leadership to fix this because this convoy is harassing and intimidating people ... and it has to end.”

The opposition Conservative Party voted to [remove Erin O’Toole as leader](#) amid the convoy protests on February 2. O’Toole had met with some members of the convoy before being removed from his post. The convoy, he had [said](#), “is a symbol of the fatigue in our country right now”.

Pierre Poilievre, a Conservative member of parliament who put his name forward to replace O’Toole, has shown strong support for the convoy protesters, saying he was “proud” of the truckers and stood with them. Candice Bergen, the party’s interim leader, in mid-February called on the protesters to take down their barricades. “Conservatives have heard you and we will stand up for you and all Canadians who want to get back to normal life. We will not stop until the mandates have ended,” she said, as reported by The National Post newspaper.



So what now?

Trudeau's Liberal government needs to present its emergency declaration under the Emergencies Act to parliament. If the House of Commons or the Senate vote it down, the order will be rescinded.

If it is upheld, it will be in place for 30 days. The Act requires a special parliamentary committee to be formed to oversee its implementation, and for an inquiry to be held after the emergency order is lifted to investigate "the circumstances that led to the declaration being issued and the measures taken for dealing with the emergency".

It remains to be seen how the Emergencies Act will be used in practice, or how the protesters will respond to any new restrictions put in place as a result of the measure. Some truckers and their supporters have promised to remain in Ottawa.

"We're not leaving. We've dug in this long," Gord, a cross-border truck driver from the central province of Manitoba, told the Reuters news agency in front of parliament in Ottawa, declining to give his last name. The use of emergency powers "is just another scare tactic", he said.

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CANADA

‘Freedom Convoy’ leader shared symbol of far-right hate group on TikTok

Dave Steenburg has called for calm and respect from protesters in other posts.

Jan. 28, 2022  



ask protesters to be respectful and calm. In December, he shared the logo of the known hate group Soldiers of Odin in a call-to-action video.

Grant LaFleche

By Grant LaFleche Standard Reporter

From the seat of his big rig, protest convoy leader Dave Steenburg regularly takes to TikTok to call for respect and calm.

If he has to, he will ask troublemakers to leave the protest.

“If someone gets out of line, please, don’t come,” he said Thursday as elements of the “Freedom Convoy” [headed to the Vaughan Mills mall](#), north of Toronto.

Steenburg’s TikTok page is also filled with videos promoting conspiracy theories about COVID-19 vaccines, pandemic denialism and videos promoting fictional war-crimes trials for those responsible for vaccine mandates.

In late December, he posted to a call-to-action video featuring the logo of a known far-right hate group, one that the Canada Border Services Agency once warned was willing to use violence in service of its aims.

“Calling all Canadians, it’s time to stand up and fight for our country,” reads the text of the video, over the Viking-head logo of the Soldiers of Odin — a defunct, anti-immigrant group which was involved in violent clashes with anti-racism groups — while a pagan-rock song about Vikings walking into battle plays.

“This isn’t about far-right or hate groups,” said Steenburg when contacted by Torstar on Friday afternoon. “Lots of people shared that video.”

Steenburg would not answer further questions about the video, the anti-vaccine content on his channel or if he had connections to the Soldiers of Odin. The press will twist his words, he said, but he welcomed reporters to come to Ottawa to ask him questions “where we can record the conversation.”

~~DUCKET SERVICES AGENCY REPORT, HAS BEEN INACTIVE FOR A FEW YEARS AND THERE~~
are no signs it is involved in the convoy, said Evan Balgord, executive director for the Canadian Anti-Hate Network.

Balgord said the fact that figures such as Steenburg within the convoy's leadership share that kind of content undercuts the message from convoy supporters that the Ottawa-bound motorcade is not linked to far-right groups or driven by anti-vaccine activists.

“That’s the point. This isn’t a few bad apples,” said Balgord. “Every single group we monitor is involved in leading or participating in this convoy. What is actually lost here are the concerns of the actual truckers.”

Steenburg is listed as Toronto leader of the convoy on the website of Canada Unity, one of the groups organizing the vaccine-mandate protest movement. In his videos, Steenburg provides updates on where the convoy is, what route it is taking, and the marshalling points along the way.

Other videos on his channel claim the novel coronavirus isn’t real and the pandemic is a plot to get people to take vaccines.

The convoy is to arrive in Ottawa on Saturday for what Canada Unity calls “operation bear hug.” The group has produced a “memorandum of understanding” calling for the end of all vaccine mandates in Canada or else the convoy won’t stop the protest.

Balgord said there was an attempt at a similar convoy in 2019 called United We Roll, but it did not attract the support this convoy has, including the more than \$7.5 million in donations collected through GoFundMe.

When Ottawa announced its mandate that requires truckers coming back into Canada from the United States to be vaccinated to avoid quarantine, drivers had legitimate concerns they tried to voice, Balgord said.

“They were saying, ‘We are not doctors or nurses or front-line health care workers’ and they are mostly alone in their trucks. Canadians generally are not mandated to get vaccinated, so they were asking why were they,”

vaccinated. But that has been completely taken over by the COVID conspiracy theory, far-right groups.”

The presence of those groups as leaders and supporters of the convoy means the concerns of Canadian truckers have been lost, he said.

“The federal government will never be able to address it now because it would appear they are capitulating to these groups.”

While the Soldiers of Odin are not active, other newer groups have espoused direct support for the convoy, including the Diagonon network, an anti-government movement that wants to see the creation of a secession state that extends from the Canadian Prairies across the United States into Florida.

Members of the Plaid Army, another group monitored by the Canadian Anti-Hate Network, posted a YouTube video last week supporting the convoy. Several of the men in the video had the Diagonon flag — a black field with a white, diagonal stripe — hanging in the background.

One of the participants in the now-deleted video said he hoped the convoy would turn into Canada’s version of the [Jan. 6, 2021 insurrection](#) at the U.S. Capitol, and that it would be bigger than the Oka and FLQ crises, both events that saw people killed.

While some of these groups espouse violence, Balgord said the convoy might not devolve into violence. Where the Jan. 6 riots sought to disrupt the certification of the presidential election, Parliament is not in session, the prime minister is not in Ottawa and MPs have been told to stay away.

Balgord also stressed that not everyone involved in the convoy shares the ideology of groups like Soldiers of Odin or the Diagonon network.



Grant LaFleche

Grant LaFleche is an award-winning investigative journalist with the Hamilton Spectator. Reach him at glafleche@torstar.ca.

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NEW

Conservative MP Pictured With Ex-WEXIT Campaigner Who Suggested Fighting COVID-19 Restrictions "With Bullets"

MP Jeremy Patzer appeared with Pat King, a former WEXIT campaigner implicated in a 2020 attack on anti-racist organizers in Red Deer

by **PressProgress**
January 28, 2022

Conservative MP Jeremy Patzer was pictured with Pat King, a former WEXIT campaigner and "Freedom Convoy" activist who said an end to COVID-19 public health precautions may only be achieved "with bullets."

Today, the "Freedom Convoy" — a rally against vaccine mandates — is set to convene in Ottawa.

late yesterday, the government's Sergeant-at-Arms sent an email to all MPs advising them

to avoid the rally and "go somewhere safe."
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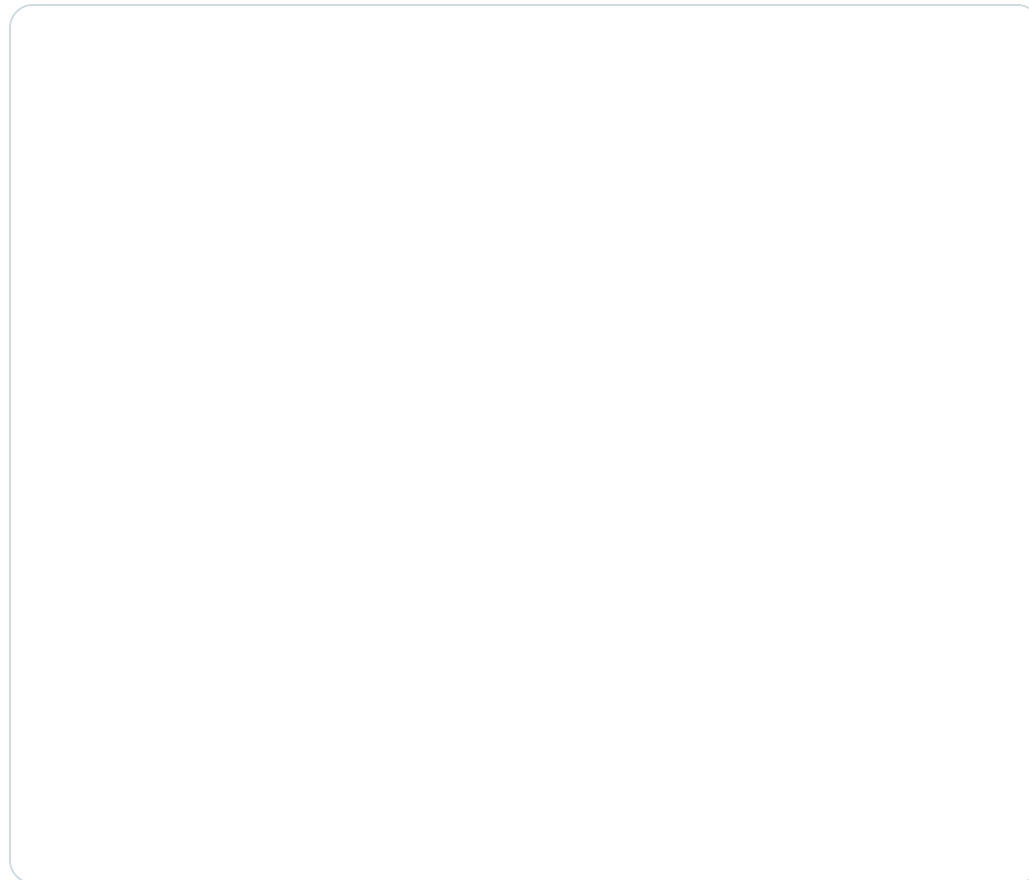
Justin Ling (Has Left)

@Justin_Ling · [Follow](#)



This evening, Sergeant-at-Arms Patrick McDonnell sent an email to all Parliamentarians ahead of Saturday's trucker convoy protest.

There have been attempts to collect MPs' home addresses. As such, the Sergeant-at-Arms is advising to avoid the rally and "go somewhere safe."



5:51 PM · Jan 27, 2022



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~~Despite warnings of possible violence, conservative party leader Erin O'Toole announced~~
<https://www.thestar.com/politics/federal/2022/01/27/erin-otoole-says-hell-meet-with-representatives-from-trucker-convoy.html> he would meet the protesters.
<https://pressprogress.ca>

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He wrote, attached to a Twitter video: "Truckers were our heroes at the start of the pandemic. Now Trudeau and his Liberal allies want to smear and demonize them."

"This convoy is really about Mr. Trudeau and the fact that people are tired," O'Toole said <https://www.thestar.com/politics/federal/2022/01/27/erin-otoole-says-hell-meet-with-representatives-from-trucker-convoy.html>). "There's a fatigue in this country, there's division and there's millions of people who feel they're no longer being heard."

But, before O'Toole's post, Jeremy Patzer, member of Parliament for Cypress Hills—Grasslands, met with the convoy himself, in Swift Current, Saskatchewan.



Jeremy Patzer
about 2 years ago



I was happy to support our truckers both locally and across Canada today in the rally against government overreach. It's time for the mandates to stop. They are only serving to cripple our economy and divide our society.



During his visit, Patzer appeared in a video alongside Pat King — described by the Canadian Anti-hate network as a former Yellow Vester and "a major figure" in the WEXIT

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In the video, King asks Patzer why he came down — Patzer replied he was: *“Just here to support all the people who are out here looking to get their rights and have their freedom back, it’s fantastic, great crowd, great to see everybody united under one banner here.”*

Later in the video, Patzer told King: “I’ve been in opposition to what Trudeau’s been doing to everything, any of the mandates, any of the lockdowns, provincial or federal I’ve been against them from the start.”

At the end, he tells King it’s “great to be here.”

As the Anti-hate Network notes, King is listed as the contact to join the “Alberta North” portion of the convoy.”

In 2020, however, [he appeared as part of a right-wing \(https://edmonton.ctvnews.ca/reported-violence-at-red-deer-anti-racism-rally-unacceptable-period-alta-justice-minister-1.5115500\)](https://edmonton.ctvnews.ca/reported-violence-at-red-deer-anti-racism-rally-unacceptable-period-alta-justice-minister-1.5115500) counter demonstration that confronted an anti-racist protest in Red Deer — [remarking \(https://www.theprogressreport.ca/progress_report_234\)](https://www.theprogressreport.ca/progress_report_234): “That’s patriots kicking antifa out of their towns!”

Regarding COVID-19 precautions, King told one Facebook livestream on December 16: “The only way this is going to be solved is with bullets.”

Kurt Phillips 🍷 · Jan 16, 2022

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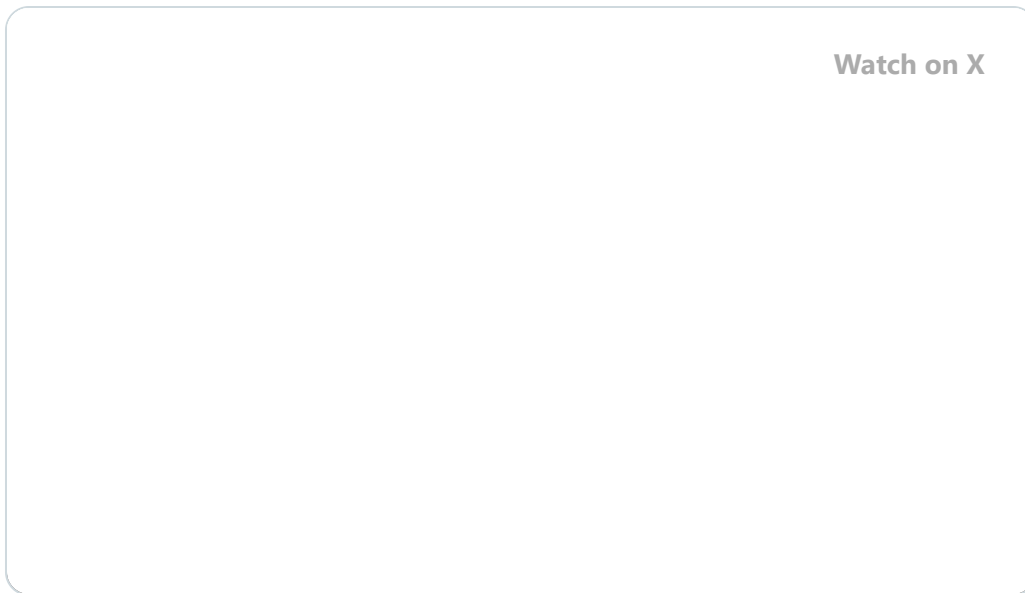
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Sometime after, Pat posted a video in which the first thing asks of his supporters is to ignore and block people who disagree with Pat and his efforts, thus ensuring that they continue to get their information from an echo chamber. 58/



Aunt E Phở 🇺🇸 🇨🇦

@JaneQCitizen · [Follow](#)

Let's be clear. Pat King wants civil war.
He doesn't mince words about it here.
(Facebook live: 16Dec21)



4:29 AM · Jan 17, 2022



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In another video, King advised his followers to stage large gatherings in defiance of public health guidelines. And, should they be reported by their neighbours, King is heard in the video saying “those people need to be shot.”

In an earlier video, King has claimed Muslims have a plan for “Anglo-Saxon replacement,” to “flood [Canada] with refugees,” and subvert Canada’s education system.

Electronically filed / Déposé par voie électronique : 31-May-2024
Ottawa Superior Court of Justice / Cour supérieure de justice

YVCE 🇺🇸 🇨🇦 🇨🇦 🇨🇦 - **ARCHIVE** · Aug 9, 2019

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It's been a bit since we've covered one of Pat King's lives.

Friends, strap in. Get a cup of tea, perhaps a snack.

This one is a ride.

THREAD /1

[#YellowVestCanadalsAHateGroup](#) [#antisemitism](#) [#transphobia](#)
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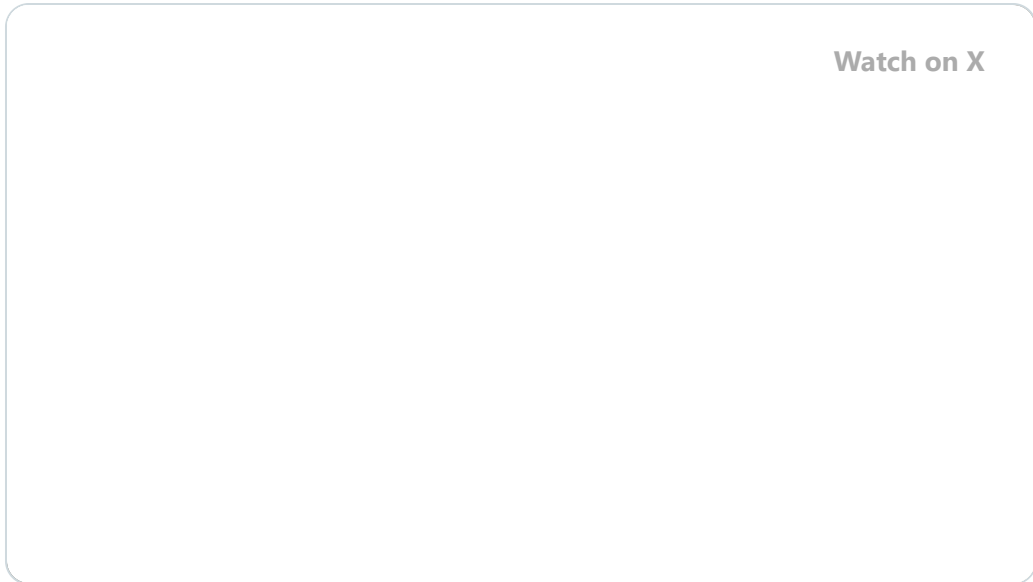
YVCE 🇺🇸 🇨🇦 🇨🇦 🇨🇦 - **ARCHIVE**

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King dives head first into the Great Replacement/white genocide myth. It's all a conspiracy, see. Because whites have "the strongest bloodlines."

He calls it the "anglo-saxon replacement" so antifa can't get mad at him.

Who is behind it? Muslims and the UN. /2



9:17 PM · Aug 9, 2019



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Canadian Anti-Hate Network

@antihateca · Follow



Last year convoy spokesperson Pat King said on stream that the Holocaust was "not the 6 million that it was said to be." Also invoked the antisemitic conspiracy that Jews secretly control politics. Worth noting on [#HolocaustRemembranceDay](#) [#cdnpoli](#) source:

YVCE 🧑🏻 🧑🏻 🧑🏻 🧑🏻 - **ARCHIVE** @VestsCanada

Pat King recorded a livestream after the rally in Red Deer yesterday. As usual it was really lame, although he does hint that he's interested in holocaust denial.

/1

8:17 AM · Jan 27, 2022



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In a statement to *PressProgress*, Patzer said:

I have no association with Mr. King, nor any awareness of what he stands for. I was introduced to him by a constituent while attending the Truckers' Convoy in Swift Current. While I support Canadians' right to peacefully protest, I fully condemn any violent rhetoric on the part of Mr. King or any other participant of the Convoy."

"The issue here is that from day one, the convoy has been organized and led by the far right," Canadian Anti-hate Network executive director Evan Balgord said.

"They need the air of respectability," Balgord said. "When a politician shows up, they're lending it an air of credibility and an air of reasonableness. And, then people get sucked in and some of those people may get radicalized."

Steven Zhou
@stevenczhou · [Follow](#)



So this Tamara Lich running the [#FreedomConvoy2022](#) GoFundMe "has ties" to Alberta's Maverick Party, formerly known as Wexit, a separatist entity.

I broke a story in 2019 re: who found the Wexit movement. Gives u can idea of where Lich is, uh, coming from:[google.com/amp/s/www.vice...](https://google.com/amp/s/www.vice.com)

12:09 AM · Jan 26, 2022 ⓘ

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King did not respond to requests for comment from *PressProgress*.

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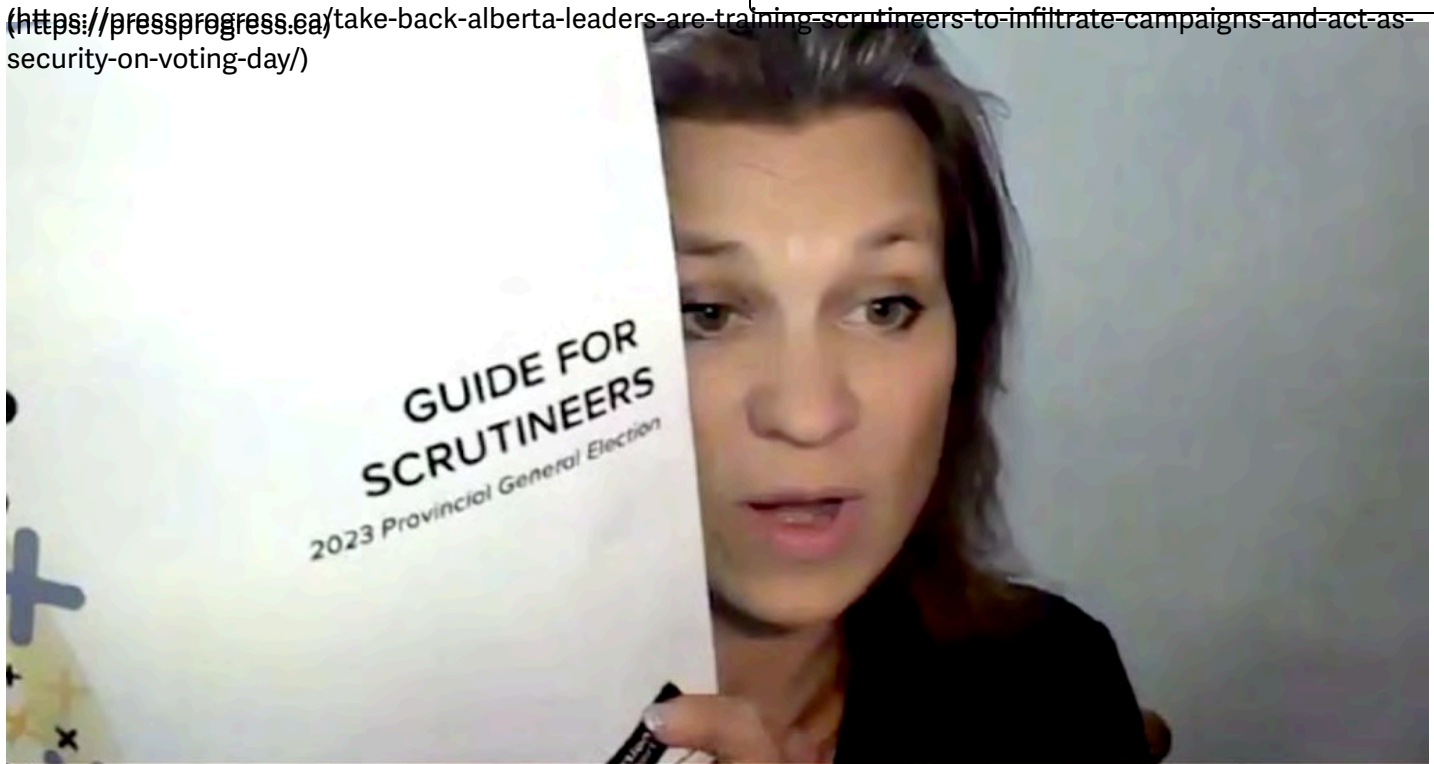
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CANADA

Some trucker convoy organizers have history of white nationalism, racism



By Rachel Gilmore • Global News

Posted January 29, 2022 12:34 pm · Updated January 31, 2022 3:40 pm · 9 min read

Global National

Protest convoy nearing Ottawa sparks concerns over possible extremist violence



-A

A+

As the first vehicles from **the trucker convoy** started appearing on Ottawa streets, some Twitter users shared a particular photo: a pickup truck with a confederate flag flying from the bed.

Now, as the convoy descends on Ottawa with the stated aim of opposing all **COVID-19** mandates, anti-hate experts allege those with white nationalist and Islamophobic views don't just represent the fringes of the movement but are among the organizers of the convoy.

"We're saying that this is a far-right convoy because – from day one – the organizers themselves are part of the far-right movement," said Evan Balgord, executive director of the Canadian Anti-Hate Network.

"They have previously been involved in far-right movements and have made Islamophobic comments in the past."

STORY CONTINUES BELOW ADVERTISEMENT

It can be difficult to determine who is a key organizer of the convoy, but there are some names that emerge time and time again – whether as authors of the \$7.4million GoFundMe campaign, as points of contact on the website that boasts a petition with 240,000 signatures, or on social media posts providing widely-shared directions to anyone hoping to join.

2 : 54

▶ **Trucker convoy vows to stay in Ottawa until demands met**

Global News contacted all the organizers mentioned in this story, but none responded by the time of publication. Jason LaFace, an Ontario organizer, did pick up the call, but upon the reporter identifying themselves, immediately laughed, said “no thank you,” and hung up the phone.

What does the convoy want?

The convoy initially kicked off with a focus on opposing vaccine mandates — especially the one aimed at truckers. The government announced in November 2021 that all Canadian truckers seeking to cross the border from the United States would need to be vaccinated in order to avoid a 14-day quarantine. That mandate went into effect on Jan. 15.

STORY CONTINUES BELOW ADVERTISEMENT

The U.S. also instituted its own ban on unvaccinated truck drivers a week after Canada implemented its policy.

In the days since the trucks hit the road, the stated goal of the movement has become muddled.

One trucker who is headed to the protest, Brigitte Belton, told Global News in a Friday interview that her goal is “to get freedom back,” and that she is “not here for politics.”

Commenting on other participants whose goals may be more extreme, she said “whatever their agendas are, that’s not what we’re here for. So they need to be quiet. They need to go home.”

A group affiliated with the convoy, Canada Unity, has produced a “memorandum of understanding” that it plans to present to Gov. Gen. Mary Simon and the Senate, and which it believes would force the government to rescind COVID-19 public health measures, or force the government to resign en masse.

“The GG wouldn’t dismiss a Cabinet that hasn’t lost the confidence of the Commons ... moreover, the GG has no authority to independently rescind laws or regulations,” said parliamentary expert Philippe Lagassé.

Who is organizing the convoy?

cohesive, but some popular webpages help paint a picture of the people behind the convoy.

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There is a GoFundMe page that has raised more than \$7 million for the trucker convoy. That fundraiser has two names on it: Tamara Lich, and B.J. Dichter.

The latest health and medical news [emailed to you every Sunday.](#)

Speaking to a cheering crowd at a People's Party of Canada convention in 2019, **B.J. Dichter warned listeners** about the dangers of "political Islamists," and said the Liberal Party is "infested with Islamists."



He added that, by meeting “with extremists,” Conservative and “establishment” politicians “put at risk moderate and secular Muslims, who want nothing more but to integrate into Canada, to become Canadian, and to leave the garbage of their birth country behind them.”

“Despite what our corporate media and political leaders want to admit, Islamist entryism and the adaptation of political Islam is rotting away at our society like syphilis,” he added, **according to a story written for the Toronto Star** by Alex Boutilier, who is now employed by Global News.

STORY CONTINUES BELOW ADVERTISEMENT

King. King is listed as a contact for North Alberta on Canada's website, which hosts the memorandum of understanding that boasts more than 240,000 signatures.

King's name was repeatedly mentioned on the convoy's walkie-talkie app, Zello, on Friday – but he has ended up in the public eye for different reasons in the past, according to footage posted online.

In a **video posted on Twitter in 2019**, King suggests that unless Canadians “get up off your as—s and demand change,” they might want to change their names to “Ishmael” or “drop a bunch of change down the stairs” and “call yourself chong ching ching chang.”

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In **other video footage**, King can be seen repeating racist conspiracy theories. In **one clip posted to Twitter by another user**, King says “there’s an endgame, it’s called depopulation of the Caucasian race, or the Anglo-Saxon. And that’s what the goal is, is to depopulate the Anglo-Saxon race because they are the ones with the strongest bloodlines,” he said.

“It’s a depopulation of race, okay, that’s what they want to do.”

He then talks about men with the first names “Ahmed” and “Mahmoud” who he claims are trying to “not only infiltrate by flooding with refugees, we’re going to infiltrate the education systems to manipulate it” so there is “less procreation” which leads to “less white people – or you know, Anglo-Saxon.

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In a **Facebook Live posted directly to his page**, King says that COVID-19 is “not a naturally occurring virus.”

“It’s not a naturally occurring virus, it’s a man-made bioweapon that was put out to make people sick, to push the narrative for all these jabs, is what it was,” he said.

“Because the jab is the, they want to be able to track you, follow you, know your every movement you do.”

King did not answer two phone calls or respond to emails from Global News.

Jason LaFace – who at times uses the name “LaFaci” – is listed as the North and East Ontario organizer for the convoy on the Canada Unity website, and has been cited in other media **as the main organizer for Ontario**. In photos posted to his Facebook page, which were screenshotted by Global News, he shared an image titled “Canadian politicians who are not born in Canada” and included his own caption: “traitors to our country.”

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IT WAS A MATTER OF 'WHEN,
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According to a screenshot obtained by Global News, LaFace posted a selfie where he wore a hat with what appears to be the initials S.O.O., which **is believed to stand for Soldiers of Odin** – an anti-immigrant group first established in Finland.

The emergence of the far-right Soldiers of Odin group in Canada raised concerns about the potential for “anti-immigrant vigilantism,” according to **a de-classified intelligence report obtained by Global News in 2017.**

STORY CONTINUES BELOW ADVERTISEMENT



Jason LaFaci

Ahhhhhhh it's crazy out there!!! Lol be safe folks!

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Screenshot/Global News

“One of the admins on their website is actually somebody who’s like the vice president of the Soldiers of Odin, a skinhead group in Sudbury, Ont.,” said Dr. Carmen Celestini, a post-doctoral fellow with the Disinformation Project at Simon Fraser University.

president of this group, which organize events that will try to stop immigration, people who are BIPOC or people who are in LGBTQ communities.”

“Last summer,” she added, LaFace posted a message on Facebook indicating that he planned to “paint over a mural in Sudbury for (Black Lives Matter).”

LaFace later apologized, saying he “should have researched a bit more what was going on in terms of the mission and why it was sanctioned by the city.”

STORY CONTINUES BELOW ADVERTISEMENT

“I apologize for my behaviour to the entire city,” he said, **according to the Sudbury Star.**

However, LaFace showed a slight change of heart **in a recent Facebook Live.**

“This whole moment in history right now has changed my life for better, for the rest of my life,” LaFace said.

“I’m not a bitter little a–hole like I used to be, where I was pretty ignorant to some people online.”

However, in that same video, LaFace also issued a message about Prime Minister Justin Trudeau.

THIS MORNING, JUSTIN TRUDEAU IS GOING BYE-BYE. IT'S TRUE, HE IS, HE SAID.

“It’s done, so now we just have to deploy our plan ... he’s gone when we’re done.”

When Global News attempted to contact LaFace for a comment, he said “no thank you” and hung up.

Muddying the convoy's cause

As the ideologies allegedly supported by a number of the convoy’s organizers make headlines, some truckers are getting frustrated.

STORY CONTINUES BELOW ADVERTISEMENT

“We’re here to get freedom back. That’s what we’re here to get, out here for. Whatever their agendas are, that’s not what we’re here for,” said Belton, referring to the more extreme voices tied to the movement.

Belton is a trucker who has been regularly making TikTok videos about the convoy and plans to attend Saturday’s protest. She is also listed as a Sarnia contact on the Canada Unity webpage.

“They need to go home. We don’t need them. We don’t need their numbers. Yeah, we’ve got huge numbers with just people that want to go back to a normal life and that’s what we want,” she said.

FACEBOOK page that those promoting violence or hate do not reflect the position of the protesters.

“As you know, we are on our way to Ottawa to hold a peaceful protest. I just want to put it out there that nobody in this convoy will be inciting violence or uttering threats. That is not what we’re here to do,” Lich said in the video.

“If you see anybody trying to associate themselves with us that is acting in that way, you need to get their truck number and their licence plate and report it to the police.”

STORY CONTINUES BELOW ADVERTISEMENT

For some, the individual views of organizers aren’t as important as what they’re doing for the cause.

When Belton was asked specifically about organizers and told some of what Global News had uncovered about LaFace and King, she said the information about the purported views is “irrelevant” for her.

“I’m coming here for freedom,” she said.

“All I know is that they’re good people to me and they are helping me.”



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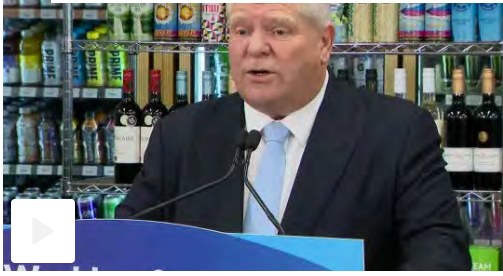
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This is **Exhibit « I »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive style with a horizontal line underneath it.

A Commissioner of Oaths, etc.

INTERVIEW

Canada's "Freedom Convoy": Is this Jan. 6 for the Great White North?

Canada's trucker protest won't lead to major violence, says expert. But some folks up north want their own Jan. 6

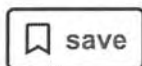
By **KATHRYN JOYCE**
Investigative Reporter

PUBLISHED JANUARY 29, 2022 8:00AM (EST)



Police officers stop traffic as people gather along the Trans-Canadian highway to show support for the "Freedom Convoy," protesting against COVID-related mandates in Rigaud, Quebec, on Jan. 28. (Andrej Ivanov/AFP via Getty Images)

1.1K



I "Freedom Convoy" of 50,000 Canadian truckers, plus millions of their supporters, will converge in Ottawa — our northern neighbor's capital — for a mass protest that will gridlock the city until all of the country's vaccine mandates are repealed.

The anti-vaccination convoy movement has raised some [\\$7 million](#), and earned the [support](#) of Canadian conservative Parliament leader Erin O'Toole, who says he [plans](#) to meet with the truckers, as well as prominent American conservatives or libertarians from [Donald Trump Jr.](#) and [Tucker Carlson](#) to [Elon Musk](#). Videos of the convoy have proliferated online, most depicting lines of tractor-trailers driving across Canada, variously set to dramatic film scores or [Twisted Sister](#), and cheered on by throngs of spectators waving the Maple Leaf flag on highway shoulders and overpasses. Other images and videos have popped up too, showcasing the efforts of convoy supporters, including a sort of [women's auxiliary](#) unit singing "O Canada" while assembling sandwiches for the truckers.

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But in the last couple of days, research and reporting has emerged that suggests the convoy, ripe as it is for gags about the polite or earnest nature of Canadians, could spell trouble. On Friday, Ottawa police asked residents of the city to avoid traveling downtown on Saturday. Security officials at Canada's House of Commons warned that demonstrators have been searching for the home addresses of members of Parliament. Groups that track the far right have warned that the convoy movement is sparking violent rhetoric online, including [calls](#) for the demonstration to replicate the

around the Parliament building.

RELATED: Tucker Carlson's Hungarian rhapsody: A far-right manifesto for waging the "demographic war"

Reporters and researchers have also pointed out that the convoy movement is inextricably tied to Canadian far-right groups, including members of radical, neo-Nazi-linked "accelerationist" networks, Holocaust deniers and supporters of the white nationalist Great Replacement theory, "sovereign citizen" types with quixotic plans to dissolve the Canadian government and, of course, QAnon adherents.

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As one leading Canadian research group, the Canadian Anti-Hate Network (CAHN), noted in an article published Thursday, "Since the start of the pandemic, COVID conspiracies have been bringing various fringe and far-right elements together. The close connections between the People's Party of Canada, the young white supremacists of Canada First, and the Diagonol network is one example. This convoy is another."

On the eve of the convoy's arrival in Ottawa, CAHN's executive director Evan Balgord spoke with Salon.

So what's going on with this convoy?

was hijacked by the far right. That's not actually true. Canada was going to have a requirement that cross-border truck drivers get vaccinated. We already have a mandate that some public servants have to be vaccinated, like nurses and doctors, and that's fairly uncontroversial. But a small number of truckers and some trucking organizations pointed out that, because the average Canadian trucker is alone in their trucks all day, why do they have to get vaccinated when they're largely self-isolating because of their work? Agree with it or not, that seems like a reasonable thing to have a conversation about. So the trucking organizations were asking the government to talk about this mandate. And the far right spotted this and just stole it — stole the idea and decided to have a convoy about it.

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About two years ago, [the organizers] had another convoy called United We Roll. It was a far-right convoy. It was all the same kind of people that we monitor at CAHN. So they stole this grievance and put together this convoy. We have these organizers on record making Islamophobic statements. One of the loudest, Pat King, has made many racist and antisemitic statements and called for violence in the past. One of the main organizers of the group that's sort of behind the convoy, Canada Unity, is run in part by a guy named James Bauder, who was involved in our Yellow Vest Canada movement. He's previously expressed support for a bunch of different hate groups. He said that [Prime Minister Justin] Trudeau needs to be arrested and charged with treason. He and some other people got together to do this convoy, so it's been a far-right project from day one.

morning newsletter, Crash Course.

Now their GoFundMe has raised around \$7 million, and the actual convoy is about to descend on Ottawa. Of course it's not 50,000 trucks or whatever ridiculous thing Fox News was saying. It's probably 100 to 200 actual trucks and then a bunch of other vehicles. But it's significant. Some people are saying they want it to be Canada's Jan. 6. So it's concerning.

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What should people expect to see in Ottawa this weekend?

I'll make one hard prediction. The irony to me in all this is the truckers actually had a kind of issue. But because the far right stole the issue, and the convoy has come to represent far-right extremism, there's no way those truckers or the trucking organizations can have an adult conversation with our government now. They've been totally fucked by this convoy.

If you look at the list of demands that Canada Unity put out in this memorandum of understanding, they're asking that the vaccine passport system and mandates just be done away with across Canada. That's everything from getting on a plane to eating at a restaurant. There's just no way that our government is going to do that. Then they've added on all these other grievances. Some people want to see a Jan. 6. Some people want Trudeau tried for treason. Some people showing up are "sovereign citizens," who believe that using some magic combination of words and pseudo-legal paperwork is going to dissolve the government. And of course, there's the others who are just

damn sure of is that they're not going to achieve anything, public policy-wise.

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But in terms of what actually happens — it's not like we don't have people who want to do a Jan. 6 here. We do, and they're always around. I don't think something like that is going to happen. Jan. 6 was fairly well planned. Not everybody there was part of that plan, and different groups had different plans, but there was significant planning behind it. I don't know that that planning is taking place here. Then there's the fact that all of our lawmakers and our prime minister aren't actually there right now. And in Ottawa, on Parliament Hill, we have concrete barriers to prevent ramming attacks and a gigantic lawn in front of our Parliament building. All of which, I believe, means it's a lot harder to storm.

But we are telling people who live in Ottawa to stay away this weekend and try not to go outside if they can avoid it. I feel really awful giving that advice. But, you know, there are people among this big convoy who are racists. There are people in this convoy who want to do violence to others. I'm not saying everybody's like that. But they'll be finally reaching their target, the thing they're maddest at, Ottawa, and there's a crowd, there's a mob. So you don't know how things can go.

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Maybe there's some violence. Hopefully not. Best-case scenario is just they honk their horns, annoy the hell out of everybody, achieve nothing and then have to go home. A lot of businesses are actually closing up for the day. And there's no public washrooms in Ottawa. They're not going to have anywhere to poop. Sorry to be crass about it. But they're not going to find a warm reception there.

There are a lot of videos online that claim to show hundreds or thousands of trucks on their way to Ottawa. And there are videos claiming to show sympathy protests in different countries around the world. How accurate are the depictions of this movement on social or right-wing media?

I have no idea of anything else happening in other countries. I certainly haven't seen any evidence of that. In terms of people supporting them, for all intents and purposes, this is an anti-vaccine, anti-lockdown crowd. And we've got a lot of them, just like the States has a lot of them, just like many countries have a lot of them. They've thrown all their support behind this, and it's not just a few bad apples, either. Every single hate group, far-right group we monitor is involved in this in some way, shape or form, pretty vocally.

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and all of that. And then there's the far right, which is not. But if anyone's talking about massive levels of support, I'd point out that 90% of our truckers are vaccinated. A lot of our truckers here are South Asian, and I don't see them participating in this convoy in numbers that would be representative. So this isn't about truckers, or the specific issue that truckers had. It's just a far-right thing.

Is this America's fault? Did we do this to you guys?

Not entirely. Canada has had its own unique hate ecosystem forever. What you do in the States does definitely strongly impact us. Of course it does. But it works both ways. I mean, stop me if you've heard the names Gavin McInnes, Lauren Southern, Faith Goldy or Stefan Molyneux before. And you know, AltRight.com, the website, was created in a Toronto apartment; Richard Spencer was living in Toronto at the time. Canada has a disproportionate impact on the States and the rest of the world when it comes to putting out thought leaders in these fascist movements as well. So it's not just the States' fault. We have to own up to our own racist, genocidal history and the systems of white supremacy that we have here as well.

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But for American readers, describing the people on the overpasses — they're somewhere between, or an amalgamation of, MAGA and Jan. 6. Meaning, with Jan. 6, there were some people that got really organized and wanted to do what happened, or even worse. And then there were plenty of people who were just there and got swept up and started to participate because somebody lit that match. With the convoy, it's similar: Not everybody that's there is a racist who wants to do violence.

have in our country is there, or is supporting it from the sidelines. So it does create a volatile situation. I don't think we're quite at critical mass. We don't have all the right ingredients, I think, to make this a Jan. 6. But the point is, there's people here who want it to be.

Read more from Kathryn Joyce on North America's far right:

- [Joe Rogan made anti-vax Dr. Robert Malone a right-wing media star: Was that the point all along?](#)
- [Florida school district cancels real history as anti-CRT censorship spreads](#)
- [How Christian nationalism drove the insurrection: A religious history of Jan. 6](#)

By **KATHRYN JOYCE**

Kathryn Joyce was an investigative reporter at Salon, and the author of two books: "[The Child Catchers: Rescue, Trafficking and the New Gospel of Adoption](#)" and "[Quiverfull: Inside the Christian Patriarchy Movement](#)."

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This is **Exhibit « J »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive style with a horizontal line extending from the end of the name.

A Commissioner of Oaths, etc.

[News](#) > "Freedom Convoy" Descends On Ottawa, Throwing City Streets Into Chaos

"FREEDOM CONVOY" DESCENDS ON OTTAWA, THROWING CITY STREETS INTO CHAOS

With Ottawa residents reporting that they are too afraid to leave their homes, some of the convoy participants have dug their heels in, vowing to stay until their demands are met.

Posted on January 31, 2022

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This was posted more than 12 months ago. The information may be outdated.

Canadian Anti-Hate Network



The first weekend of the "freedom convoy" has passed, and while police have not released official numbers of the crowds, observers say the total numbers likely reached into the multiple thousands.

highways on Sunday night saw no shortage of vehicles heading away from Ottawa with signs and flags still in tow.

What remains outside of parliament, and in its surrounding streets, are a fleet of semi-trucks, commercial vehicles, RV campers, and the people who are digging in – with over \$9 million raised for the effort.

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Swarming across Wellington Street, the crowds shuffled across the sidewalks often in between the blocks of parked trucks that occupy the asphalt. Numerous other vehicles set up shop along other stretches of road, idle and unmoving.

While the weekend has passed, we will continue to report on the organizers and participants of the convoy that remain embedded outside the seat of the federal government.

Here is a look at how things went down over the weekend.

IT BEGINS



While the vast majority of participants were nonviolent, violence did occur, both at and around the Hill on Saturday. Many participants rejected the notion that the convoy or its supporters were somehow entangled in Canada's various hate networks, in many cases defiantly embracing the quotes of Prime Minister Justin Trudeau and titling themselves a "fringe minority" holding "unacceptable views." In a convoy ostensibly about human rights, others appeared to push their own agendas.

However, despite claims of racism and hate being unacceptable during the event by organizers, observations of the three days and two nights since the convoy descended upon Ottawa indicate that, in addition to violence, both harassment and vandalism occurred throughout the downtown core.

Journalists and their crew reported being assaulted by having cans of beer hurled at them, or attacked by convoy participants as they tried to work. Others reported harassment, according to the Canadian Association of Journalists.

A photograph shows one convoy participant performing a seig heil or the Nazi salute; the photographer says it was unmistakably a seig heil, thrown repeatedly in time with the honking of horns.



Source: [@CanadianCentury on Twitter](#)

There were also multiple instances of swastikas being displayed on the Hill and nearby. While the antisemitic display of swastikas stylized and designed to criticize the government and vaccines (and vaccine mandates) have become a common sight at protests, one large version of Adolf Hitler’s *National Socialist Workers Party* flag was flown and photographed on Saturday.



Far from the only hate symbol on site, US confederate flags were also being flown – and protesters have begun to claim one person doing so was a plant meant to make them look bad. However, several individuals

was also seen displaying a flag for the Ill%ers across its hood, an American-based far-right militia group with a small membership base in Canada. It was designated a terrorist entity in Canada during June 2020.



Not found

Someone just sent these my way: More photos of the Nazi flag that was spotted at today's convoy protest. (The other photo that was shared earlier today was taken nearby)

pic.twitter.com/XsnAFC08En

— Justin Ling (@Justin_Ling) [January 30, 2022](#)

In the crowd, a handful of members of the Islamophobic hate group *La Meute* stood in their approximation of biker gang jackets. In similar apparel, the anti-vaccine group *Farfadaa* appeared. Lesser known, *Farfadaa's* membership includes [Steve Charland](#), a one-time leader of *La Meute* who also appears to have made an appearance on Saturday.

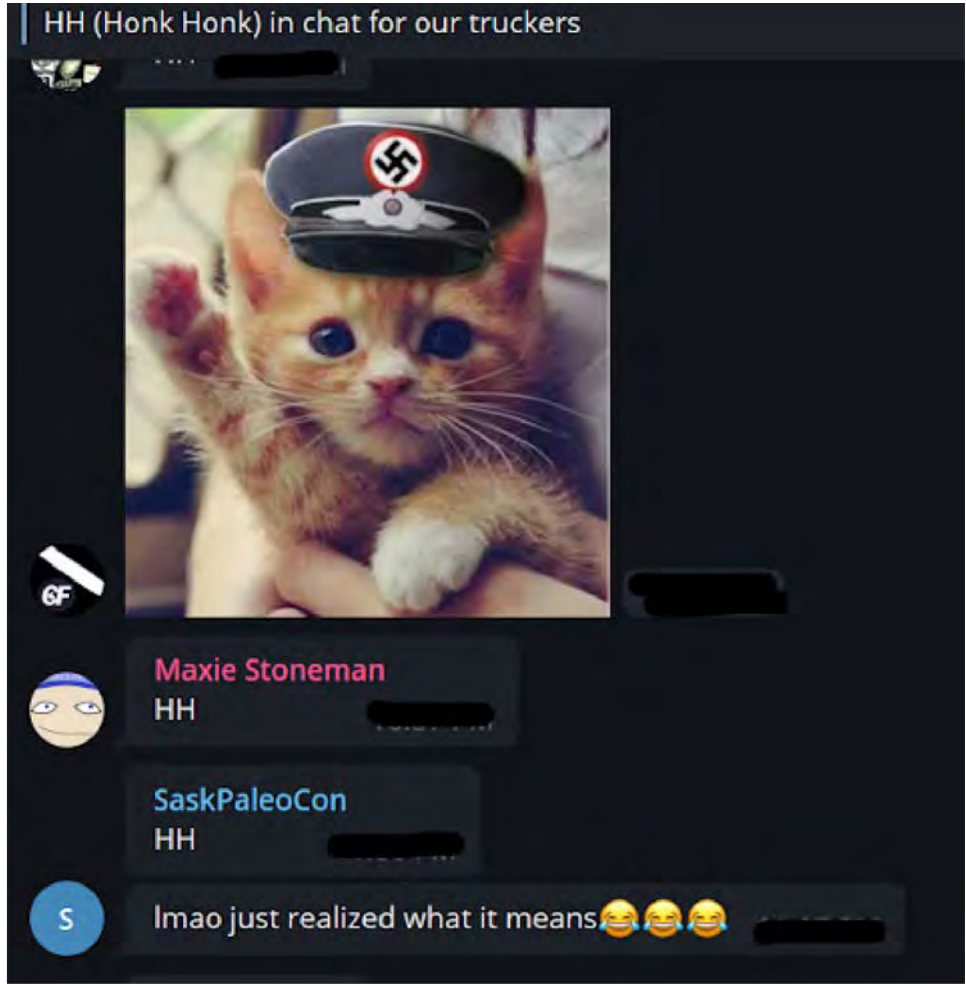
Most notably, members of the Plaid Army streaming collective chose to remain away from the protest site on Saturday. A few supporters did arrive, but none waved the black and white flag – a symbol of the fictional country of Diagonlon – that was seen flying from multiple branches of the cross-country convoy during its push towards the capital.

Before the rally, we and other news outlets made note of the statement made during a Plaid Army live stream by Derek "Rants" Harrison saying he hoped to see an event in Ottawa similar to the events at the US Capitol building on January 6. The resulting attention led to him and others to take a much more subdued approach to their attendance -- de facto Plaid Army/Diagonlon leader Jeremy MacKenzie and Derek Harrison holed up in their hotel rooms on Saturday. Citing an inevitable false flag plot to foil convoy supporters, MacKenzie and Harrison instead chose to stream throughout the day, saying earlier that it would be proof they were not present on the Hill.



Among those there, however, was *Canada First* host and white nationalist Tyler Russell. Flanked by supporters, including one waving the signature “CF” flag of his network, he was also joined by friend and Plaid Army supporter Dan Sleno, as well as Shane Marshall. Marshall is a former riding manager for the recently failed election of People’s Party of Canada candidate Chelsea Hillier and is currently facing charges for allegedly throwing a handful of gravel at Justin Trudeau during a campaign stop. We previously revealed that Marshall also posted white supremacist music about killing immigrants to one of his many social media accounts.

Before arriving in Ottawa for the protest, Russell had posted to Telegram asking his followers to post “HH (Honk Honk) for our truckers.” His fans obliged, with one posting “Imao just realized what it means.” HH is shorthand in white power spaces for Heil Hitler.



Source: Telegram

“SIGNIFICANT STRAIN” PLACED ON LOCAL SOCIAL SERVICES

As the first night set on the convoy, Ottawa remained snarled by traffic from Parliament down to the Centretown neighbourhood. Much of the group, supporters and truckers alike, spent that time partying late into the night. Despite the large amounts of funds raised, it appears food was not made available to all of those involved.

Businesses in the surrounding areas that did not close ahead of the protest were swarmed with customers, many reportedly refusing to wear a mask.

According to the Shepherds of Good Hope, a local soup kitchen and shelter, convoy participants who were turned away from restaurants after refusing to wear a mask arrived at the shelter demanding to be fed by the facility staff.

“Our staff and volunteers experienced harassment from convoy protestors seeking meals from our soup kitchen,” the organization wrote in a statement on social media. “The individuals were given meals to diffuse the conflict. Management was then informed of the issue and no further meals were given to protestors.

Ottawa. This weekend's events have caused significant strain to our operations at an already difficult time."

Officials working at the shelter [told the Ottawa Citizen](#) the protesters' behaviour was "mob-like" and complained that the parked vehicles blocked the shelter making it difficult for ambulances to reach their facility and for staff to assist community members in need.

Disturbingly, according to the shelter's president, convoy participants assaulted a client of the shelter, and hurled racial slurs at the security guard who attempted to intervene.

On an audio recording of the Zello channel – a walkie-talkie app that convoy participants are using to communicate with others – convoy participants said they felt entitled to these services intended to help individuals without housing or food security in Centretown. One user said they are "homeless" in Ottawa, which he called hostile, and shared conspiracy theories that Justin Trudeau is paying off restaurants to not serve them.

"You bet, brother," another participant replied. "Those resources are there to help you guys as well."

A [statement from police on Sunday morning](#) indicates that there were no arrests made Saturday night related to the convoy, though multiple reports from around the city allege harassment and disorderly conduct. Among them, the accusation that a home was pelted with rocks and snow, as well as vandalized with human feces – all for flying a pride flag in their window.



Not found

One of our members in [@cmckenney](#)'s ward had rocks and snowballs thrown at her windows because she had a pride flag hung up.

A protestor also defecated on her fire escape and threw human feces against the wall.

Why is this disgusting harassment allowed? pic.twitter.com/8mJVDwTTEx

— Rainbow Ottawa Student Experience (ROSE) (@RainbowOttawa) [January 30, 2022](#)

Other reports from the night included videos of a man dancing on top of a vehicle spraying fire into the air above him with what appears to be a tradesperson's torch, wielded as if it was a small flamethrower.

The city, in turn, is struggling to function anywhere near normally in the most impacted parts of the city. Many downtown residents report feeling abandoned by the city and law enforcement, and are afraid to leave their homes.



Not found

This is not my Canada. [#FluTrucksClan](#) [#Canada](#) [#ottawa](#) [#TruckersGoHome](#)
pic.twitter.com/PylZfvkh5h

— Heather Young (@heathyoung) [January 31, 2022](#)

The Rideau Centre, a major shopping centre near the protest site, and the subject of an organized maskless 'shopping trip', will [remain closed for the third day](#). On Saturday, a flood of convoy participants descended on the downtown building, demanding to be served, forcing its closure. Road blockages have led the city's public transportation provider to issue warnings to passengers to expect delays while several vaccination clinics, including one at [Ottawa University have closed as a result of the event](#). OC Transpo cancelled all service to the downtown area entirely.



Not found

Illegal & disturbing activity continues throughout our residential neighborhoods. I've heard from 100s of residents who are tired & frightened at what they are experiencing in their neighbourhoods. I am hearing reports of trucks driving through red lights without pausing. /1

— Catherine McKenney (they/them) (@cmckenney) [January 31, 2022](#)

Ottawa City Councillor Catherine McKenney told their Twitter followers that they have received hundreds of complaints from residents who are "tired & frightened at what they are experiencing in their neighbourhoods."

According to the [operations commander for the Ottawa Paramedic Service](#), an ambulance was pelted with rocks and a paramedic checking the damage was called racial slurs by convoy participants. Ottawa paramedics have since [requested a police escort](#), citing safety concerns.

More public ire was also raised when [pictures surfaced of a monument dedicated to commemorating Terry Fox](#) was shown draped in protest signs and made to hold an inverted Canadian flag – a sign of distress. Protesters have since cleaned the statue, with some online reports including blame directed at "antifa" for this.

STAGE TIME



Both PPC leader Maxime Bernier and Ontario Member of Provincial Parliament (and leader of the de facto Ontario arm of the PPC) Randy Hillier spoke on Saturday, choosing to stand on a small platform closer to the Parliament building rather than the flatbed truck that would serve as a stage for both Saturday and Sunday.

Hillier has been leading a group called *No More Lockdowns* since early in the pandemic. Historically a strike organizer since early in his political career, COVID-19 has seen him throw in with the *Plaid Army*, and most specifically Jeremy MacKenzie – a former combat veteran and the most popular live streamer from the collective. Both MacKenzie and Derek Harrison quietly attended the protest site on Sunday, choosing to avoid having their already well-publicized presence become a distraction the day before. MacKenzie instead appeared as a guest on Alex Jones' *Infowars*.

Photos show Maxime Bernier visiting the pair at their hotel room over the course of the weekend. Bernier has repeatedly associated with the Diagonol/Plaid Army streamers, who have recently shifted from sharing online threats and antisemitic content to focusing on the creation of localized in-person meet-up groups for their supporters. MacKenzie specifically has not only spoken of the inevitability of a race war and domestic conflict, but has previously claimed that it is already occurring in the United States.

Christopher James Pritchard, [host of the A Warrior Calls](#), also appeared and took the stage on Sunday.

A proponent of an extremely convoluted pseudo-legal philosophy that falls within the Sovereign Citizen movement – though he denies this association – Pritchard's speech included familiar assertion that the legal system does not apply to individuals due to his nonsensical but confident interpretation of the law.

His speech on the hill, however, comes shortly after he made multiple antisemitic statements about global Jewish conspiracies online. This includes mention that "Hitler was destroying the Jesuit ... central bankers" and warning of "Jewish satanists" controlling global financial systems.



Not found

Christopher James Pritchard got to speak at the rally on Parliament Hill today (Sunday, the second day), promoting his Sovereign Citizen theories + website.

On Thursday he did a show that began with a Hitler speech, where he promoted Holocaust denial and attacked "Satanic Jews." pic.twitter.com/OTjPouvEkg

— Drew (@nolifeneet) [January 31, 2022](#)

THE LONG HAUL



According to the convoy participants themselves, they are not moving until their demands are met. While the issue becomes much broader on the ground, the current "Memorandum of Understanding" posted on organizer *Unity Canada's* website details what they are looking for.

the document reads. "It calls for an immediate instruction to all levels of the Federal, Provincial, Territorial and Municipal governments to not only stop but furthermore waive all SARS-CoV-2 (and not limited to SARS-CoV-2 subsequent variations) fines that have been issued and imposed upon its citizens, institutions, and private enterprises. Further, to immediately reinstate all employees in all branches of all levels of governments and not limited to promote the same to the private industry and institutional sectors employees with full lawful employment rights prior to wrongful and unlawful dismissals.

"Lastly, it instructs all levels of government and private sector that the illegal use of a Vaccine Passport to cease and desist immediately."



At time of writing, GoFundMe has released a reported \$1 million dollars of the currently over \$9 million raised for the convoy.

Our earlier reporting found that not only did the multi-million dollar fundraising organizer Tamara Lich have a hand in a previous, extremely similar, pre-COVID convoy, she was also an organizer and self-identified "Yellow Vest" who has made Islamophobic statements and posts to social media. This lines up closely with the statements of the man added to the GoFundMe the week before the convoy arrived in Ottawa, Benjamin "BJ" Dichter, a former Conservative candidate who defected to the PPC.

"[The Conservative Party of Canada] is suffering from the stench of cultural relativism and political Islam," he said during the first PPC conference held in Gatineau, Quebec. "It is suffering from the stench of extremism that same way in third-world countries suffer from extremist groups, separatist groups, communist guerrilla factions, paramilitaries, organized crime, and more."

In the same speech, he also noted his belief that "Islamist entryism" is "rotting away at our society like syphilis."

apologize for this error.

LATEST NEWS



May 23, 2024

FREEDOM CONVOY ORGANIZER IDENTIFIES HERSELF AS A "WHITE NATIONALIST" IN CONFERENCE CALL WITH NEO-NAZIS

In the recording, Bethan Nodwell denied the Holocaust, remarked how her relationship with her Jewish business partner with Trinity Productions had become strained, and claimed that "white identitarianism is inevitable."



May 16, 2024

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May 15, 2024

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A now-deleted ticket page for the event reads, "Ask yourself, how can we help Albertans put a stop to COVID shots that kill children?"

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5/31/24 9:59 AM

"Freedom Convoy" Documents On Ottawa, Toronto, City Streets Into Chaos - Canadian Anti-Hate Network

Electronically filed / Déposé par voie électronique : 31-May-2024
Ottawa Superior Court of Justice / Cour supérieure de justice

Court File No./N° du dossier du greffe : CV-24-00095074-0000

info@antihate.ca



This is **Exhibit « K »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive style with a long horizontal stroke at the end.

A Commissioner of Oaths, etc.

[News](#) > **Ottawa Occupation Shows Why We Need Anti-Hate Legislation**

OTTAWA OCCUPATION SHOWS WHY WE NEED ANTI-HATE LEGISLATION

Every day the government allows social media companies to self-regulate, Canadians are getting misled, enraged, and absorbed into the far-right and Covid conspiracy movement. Now a far-right mob has occupied the capital.

Posted on February 4, 2022

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This was posted more than 12 months ago. The information may be outdated.

Canadian Anti-Hate Network



Ottawa has now been occupied for a week with no end in sight. They are led by a cadre of organizers and streamers who are connected with [Islamophobia, antisemitism, racism, and incitements to violence](#). Many among them want to see the Prime Minister and public health officials put on trial for treason, or executed.

would directly confront passer-by, physically attack journalists, wave a Nazi flag, or assault a houseless person, hurl racial slurs, and take food from a soup kitchen.

The people supporting this far-right occupation are both victims and perpetrators of misinformation. Most of them find their way to the movement beginning on mainstream social media platforms. The algorithms notice they engage with conspiracy content and far-right content, feeds them more, and suggest groups for them to join. Fellow travellers say the unvaccinated are being persecuted on the same level as Holocaust victims and that drastic action is necessary. Eventually, they're angry enough to drive to Ottawa.

It will be difficult, if not impossible, for members of the intertwined antivaxx and far-right movement to come back to reality. New people are finding them every day. With online harms legislation, we may be able to disrupt that pipeline by making it harder for dis/misinformation to find people. We may be able to build a fence of protection both online and offline around the groups that the far-right slanders, harasses, threatens, and attacks. We have to try.

We urge you to contact your MP, send them this article, and tell them it's time to make the social media platforms be at least a little socially responsible.

The government was proposing a complicated regulator that would try to address several kinds of online harm, like child sexual exploitation. Its thorniest and most controversial issue was that of regulating hate speech. The technical paper envisioned a body that would hear complaints about pieces of hate content and issue rulings on whether each post stays up or comes down.

The government received a lot of critical feedback on its plan. We had our issues with the technical paper too.

We urge the government to look at the convoy outside the window to understand why we cannot put this issue on the back burner. We must push forward with a better and (hopefully) more popular plan.

One in five Canadians are directly affected by online hate; harassers use hate speech to silence and scare women, BIPOC, LGBTQ+, First Nations, Métis, and Inuit peoples, and others.

It's important to note that 80 per cent of Canadians want legislation to curb online hate. However, the average person is not writing a feedback letter to the government about a technical paper. Some of the critical letters are coming from the companies themselves, which should frankly be thrown out – they demonstrably can't be trusted. But more of that criticism is coming from dogmatic free speech academics and organizations.

These civil liberties advocates aren't trying to do harm, or do nothing, but they seem not to understand that the prevalence of hate speech and how it silences people is the free expression issue of *this* generation. We would rather see a small amount of posts that are not-quite hate speech be a casualty of any legislation rather than have hate speech continue to attack and silence women, BIPOC, LGBTQ+, First Nations, Métis, and Inuit peoples, and others. It's time for the speech of equity seeking groups to be prioritized over racists, abusers, and neo-Nazis.

unwarranted police involvement in the process / with the regulator, and the complaints regime being wielded against them by bad actors. They're right and we should all be listening.

Additionally, and fundamentally, the plan put forward in the technical paper seems to address the wrong problem.

The problem is not that the complaints mechanisms on Facebook and other platforms are slow and poorly adjudicated. We shouldn't be handing victims a homework assignment to get hate content taken down long after it's already done its damage anyway. The problem is that there are people who want to harass, abuse, and incite violence with hate speech, and that platforms have decided to allow it to be posted in the first place, and even amplify it.

Like everyone says, we really need to go after the business model of these companies, which have decided to prioritize engagement at the cost of our democracy and the safety of our neighbours. The platforms have been purposely getting people angry and funnelling them into dangerous echo chambers.

We sat with this for a while, and we think we have a solution.

We're calling it the ombudsperson approach.

We're recommending that the government create an ombudsperson/regulator, with broad investigatory powers. They can compel evidence and testimony from the social media companies and take a hard look at their algorithms and business practices. They can also issue recommendations.

Facebook's own employees warned that after it changed how it measured the success of a post in 2018, it incentivized angry engagement and misinformation. In 2021, another employee found that new users were being quickly pushed by their algorithms towards QAnon groups. Internally, Facebook staff have been warning about problems and proposing solutions for years. We also know, thanks to Facebook whistleblower Frances Haugen, that the company chooses not to implement any fixes (in any reasonable time frame) that would hurt engagement.

Meanwhile, hundreds and thousands of people were being radicalized into the far-right, estranging them from their families, and movements were recruiting people on Facebook that would culminate in murders and mass murders and incidents like January 6th and the Ottawa convoy.

If the ombudsperson had access to this information in real-time, they could, for example, issue a timely recommendation that the company has to undo the algorithmic changes that incentivized angry, divisive posts and misinformation.

We propose that if the company doesn't want to follow a recommendation, the ombudsperson be empowered to apply to a court to make it an order. The court would apply two tests. First, is the order consistent with the goals of the regulator. Second, is it consistent with the Charter and previous rulings. Here, groups can intervene and put their arguments to the court.

If the order is granted, and the company doesn't follow the order, we propose that they face significant fines (the same as envisioned in the technical paper).

Of course, this is just a starting point and a framework. But we would like to keep it simple and move it along.

contentious police involvement and 24-hour takedown pieces, and isolated free speech vs. hate speech arguments can be had later, in front of a court.

We urge you to [contact your MP](#), send them this article, and tell them it's time to make the social media platforms be at least a little socially responsible.

The government asked for our feedback on the technical paper, and for a path forward. This is what we sent them.

CAHN RESPONSE TO PROPOSED ONLINE HARMS LEGISLATION

WHAT WE LIKE ABOUT THE PROPOSALS SO FAR:

We like that the government is taking the issue of online harms seriously.

We like that the government is intending to establish a new regulatory body responsible for this issue. We also like the idea of an Advisory Board, although we would probably construct it somewhat differently than how it's described in the technical paper.

We like the emphasis, in the technical paper, on creating new requirements for transparency from platforms, and creating new reporting requirements.

We like the requirement to make it easier for users to report harmful content.

WHAT WE DON'T LIKE:

We are concerned that the proposed approach to handling online harms doesn't seem to be rooted in a government-wide strategy for digital overall. The government has a number of initiatives underway that touch on digital matters, including this new approach to handling online harms, new privacy legislation, changes to the Broadcasting Act, and an initiative related to the funding of journalism. All these efforts need to be animated by a coherent strategy, and we are concerned that they are not. At this point, it is not clear what the government's vision is for Canada's digital future. That's a problem. It's hard to imagine us making much progress if it's not clear where we're trying to go.

As imagined to date, the proposed approach to handling online harms is fundamentally reactive in nature. It is aimed at identifying and removing harmful material after it has been published. We think this is fundamentally the wrong approach because it is unresponsive to the true nature of the problem. The reality is that there is a continuous firehose of harmful material being posted to the internet by many different bad actors, and there is a multitude of harmful content available online at any given moment in time. Any approach that aims to solve this problem reactively, by creating a process for the evaluation and removal of individual pieces of content post-publication, will fail. It will fail because i) it will rely too much on individuals reporting harmful material, which is an inappropriate burden on those people, ii)

that provides sufficient protections against unjustified takedowns and also speedily removes content that is actually harmful, iv) it will require the creation of an enormous bureaucratic machinery and will impose serious administrative burden on many different parties, and v) it does nothing to change the incentives for the platforms, which currently have a strong business incentive to continue allowing sensationalist material, including hate speech and other harmful content. Additionally, any approach primarily or solely focused on content takedowns will inevitably trigger serious free speech concerns, as we have seen.

We don't like the 24-hour takedown requirement. Civil liberties groups are concerned that the 24-hour takedown creates a requirement for platforms to remove/take down online speech. They believe all speech is good speech, and ought not to be constrained. That is not our concern. Our concern is narrower and more specific. We don't like the 24-hour takedown because we believe it will have the unintended consequence of providing a mechanism enabling bad actors to make false reports of hate speech against material posted by equity-seeking groups, resulting in that material being taken down. To be clear: Our concern is that the 24-hour takedown will be abused, resulting in platforms taking down material that is not hate speech, and which should not be taken down.

We don't like automatic/mandatory reporting to law enforcement. Law enforcement has existing avenues for accessing the information they need to do their work, and we don't believe massively increasing the amount of information to them, in an automatic/mandatory way, is necessary or would be net beneficial.

WHAT WE THINK SHOULD BE CONSIDERED GOING FORWARD:

We believe the best path forward would focus on the creation of a new regulatory body, with three main emphases, as follows.

- 1 A solid emphasis on creating new transparency and reporting requirements for platforms. The platforms are currently a black box. Their practices, and the societal implications of their practices, are not yet well understood. Other jurisdictions have been significantly ramping up transparency and reporting requirements, and Canada should do this too.
- 2 The creation of a new affirmative obligation for platforms at a high level, requiring them to consider the societal effects of their practices and take steps to mitigate harms in the public interest. This is a practical acknowledgement that the platforms know more (and will always know more) about their operations than any regulatory body can possibly hope to know. We have learned from whistleblowers that there are people and divisions inside social media companies whose responsibilities include user protections, and that those people and divisions are routinely overruled in favour of what best serves the companies' business interests. In creating affirmative obligations to consider user interests, we would be aiming to add weight to those internal user advocates, to tilt the balance internally towards better user protections, and better protection of the public.

investigate emergent harms and create orders protecting against societal harms. For the purposes of this note, we are calling this "the Ombudsperson approach." It is further detailed below.

THE OMBUDSPERSON APPROACH

We have been socializing the idea of an ombudsperson approach with other civil society groups, and it's finding support. Some of the ideas here are, in fact, already in the technical paper.

Here's what we've been imagining:

The ombudsperson (and their office) would be empowered with broad investigatory powers so that they can compel evidence and testimony from large online platforms.

They would be empowered to make public recommendations, in keeping with a charter of values.

Where the companies do not follow the recommendations, the ombudsperson may apply to a court to make those recommendations into orders.

The court has a short time window to apply a two-pronged test. First, does the proposed order align with the charter of values? Second, is the proposed order in keeping with the Charter and previous jurisprudence around hate speech?

Interveners could make submissions at this stage.

If the order is granted, and the company or companies do not comply, they will be subject to the same strict financial penalties laid out in the technical paper.

The ombudsperson may take complaints as evidence of an issue, but does not address individual pieces of content.

In an emergency situation (eg. Jan 6th), the ombudsperson may make an emergency order which goes into effect immediately, but also convenes an emergency hearing with the court to either uphold or quash the order.

We would leave it at that. The ombudsperson approach would move things forward in a real way, while kicking individual issues that are causing so much opposition to the ombudsperson, interveners, and the court at a future date.

LATEST NEWS



May 23, 2024

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Ottawa Occupation Shows Why We Need Anti-Hate Legislation

Electronically filed / Déposé par voie électronique : 31-May-2024
Ottawa Superior Court of Justice / Cour supérieure de justice

Court File No./N° du dossier du greffe : CV-24-00095074-0000

info@antihate.ca



This is **Exhibit « L »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

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A Commissioner of Oaths, etc.

[News](#) > [I Am Living Through The Ottawa Occupation](#)

I AM LIVING THROUGH THE OTTAWA OCCUPATION

Downtown Ottawa is a bizarre carnival full of conspiracies and diesel smoke.

Posted on February 9, 2022






This was posted more than 12 months ago. The information may be outdated.

Written by Ian B.



Since late January, Ottawa has been under siege by a far-right mass mobilization, ostensibly geared toward putting pressure on the government to lift all COVID-19 measures, but also asking for a full on coup. Downtown Ottawa has been thrown into chaos, with residents reporting violence, harassment, racial slurs, and hate symbols. Social services have been greatly affected, businesses have been shuttered, and some residents haven't had a good night's sleep in more than 10 days. Ian, an Ottawa antifascist, has been observing and documenting the so-called "Freedom Convoy 2022."

When the Convoy began to roll into Ottawa on Friday, January 28th, my wife and I decided to drive downtown to photograph the first vehicles to arrive. This was the first time we were introduced to the symbols and slogans used by the movement firsthand; protesters and their vehicles are very distinct. Honking horns and flashing hazard lights, almost every participant had either some kind of flag, or stickers on their vehicles.

We decided to go into the protest on foot the next day to observe, photograph, and film the convoy, once the bulk of it had arrived.

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By Saturday the leading elements arrived in the city. We determined it was unsafe to counterprotest openly. This decision was based both on advice from law enforcement, and that of more experienced organizers who said that the threat level was unacceptable to carry out a community action.

Instead, we decided to stick to photographing the vehicles and the business logos on them, as well as individuals displaying hate symbols or flags. The uniformity not just of the trucks, but the people themselves was striking. I was overwhelmed with Canadian flags, some of them adulterated with other symbols. The "Canadiana" that we saw was a theme. Hockey sticks were used as flagpoles, despite organizers allegedly telling protesters not to use them. (Participants are still holding regular hockey games at the occupation sites.) Flags and signs of vaguely "patriotic" messages abound, with many parroting "eh" or "I AM Canadian."

Now, ten days into this occupation, I am disgusted at the sight of a Canadian flag.

Merchandise with slogans like "F*ck Trudeau" and "Hang Trudeau" sat on display. One vendor posed for a picture, modelling his goods. In addition to the Canadian flags, we saw an abundance of yellow and black Gadsden flags, the "Kingdom of Canada" flag associated with the QAnon-adjacent influencer Romana Didulo, a sign with a yellow Star of David comparing health measures to the Holocaust, as well as flags of many other nationalities.

While on Parliament Hill, we were alerted by a friend that there were reports of increased police activity and that tensions were rising. We took their advice to leave and were walking along Elgin when we were confronted with an overt incident of hate. A man walked by us, beers in hand, throwing a Nazi salute in time to the honking around us.



Source: [@CanadianCentury on Twitter](#)

In the following days we were hearing on social media that there was some kind of staging area in RCGT Park, a city-owned baseball diamond parking lot. On February 3rd, we went down there and found not a staging area but a fuel depot. There were pickup trucks with slip tanks coming in at a rate of one every five to ten minutes. These would be used to fill up jerry cans which in turn were being taken into town by other trucks. The police were watching it happen. We saw the same thing downtown - protesters in clear view of law enforcement, handling jerry cans and fueling vehicles.

We decided it was safer not to wear masks when near the convoy. Harassment and assaults by convoy supporters against people wearing masks were rumoured to be happening as early as Friday, and, weighing the risks, we felt that it was safer to blend in (we wear N95s at all times elsewhere, and are currently isolating from our families).

Safety has been a problem since the convoy arrived. We went to protest at Member of Parliament Pierre Poilievre's constituency office in Manotick, and even there we found ourselves being intimidated by convoy supporters. Several trucks with the usual flags and stickers repeatedly circled the block.

The intimidation has stepped up and the trips I took to document the convoy and share information became increasingly dangerous. On our second trip to Centretown, we were observed taking photographs of business logos and then tailed out of the downtown area by a young man. We managed to shake him after six blocks.

I started getting intimidating emails from a far-right figure in the USA on the eighth day of the protest. Some vehicles in the convoy, usually the pickups and SUVs outside the protest's core, took to driving all over the city at all hours. It gives a very strange and inescapable feeling of occupation and paranoia even to those

Ottawa Police Service.

PEACE, LOVE AND “ANTIFA FALSE FLAGS”

Being in the protest is a deeply unpleasant experience. The honking is horrendously loud, such that when we went back for the second time in the so-called Red Zone, we preemptively took painkillers for the headaches.

Fireworks are common. One particularly aggressive display triggered my PTSD (developed while serving in the Canadian Armed Forces) so badly that I dove between two parked cars for cover.

Conspiracy theories abound in all forms and are shouted over the honking all day. On the rare occasion that we confronted anybody about the swastika flag, issues of racism, or the talk about a coup attempt, everyone responded with what felt like rehearsed statements about peace, love, and “antifa false flags.”

Now, I’m being harassed online and, even though it is their side flying swastikas and confederate flags, it’s the convoy’s supporters who are calling me a racist or a Nazi. The whole experience is like living in a bizarre carnival full of conspiracies and diesel smoke.

The anger and fear in Ottawa are palpable. I don’t know anybody from Ottawa who thinks the Ottawa Police Service has handled this competently. Most are contemptuous of the police, and many believe there is active collusion. People are being assaulted, and many are afraid to leave their homes, especially after dark.

People don’t know when or how this will end, and they feel totally abandoned by law enforcement, the city, and they are scared of what will come next. Many, myself included, are now questioning how to oppose the convoy if the city and the police let this continue to drag on.

Activist networks are forming and people are working to identify the companies involved in the convoy and find out where the funds and fuel are coming from. Others are using humour, and trolling the convoy communications channels.

These small community actions are building the basis for future organizing and giving us all a bit of hope and lightness as we deal with a scary situation that has no end in sight.

Follow Ian on Twitter at [@CanadianCentury](https://twitter.com/CanadianCentury).

LATEST NEWS



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Cross Country Checkup

Why the word 'freedom' is such a useful rallying cry for protesters

The word has become common among far-right groups, experts say

CBC Radio · Posted: Feb 13, 2022 4:00 AM EST | Last Updated: February 13, 2022



choice' for Canadians. (Chris Young/The Canadian Press)

As demonstrations against COVID-19 restrictions continue across Canada, the word freedom is on the lips and placards of many protesters.

Often associated with protests and rallies in the United States, the term has taken hold among protesters who are part of the Freedom Convoy, which rolled into Ottawa in late January and has become entrenched in the city's downtown.

For many, freedom is a malleable term — one that's open to interpretation.

That flexibility, in part, has fuelled its growth among certain groups, said Barbara Perry, director of the Centre on Hate, Bias and Extremism at the Oshawa-based Ontario Tech University.

"It is a term that has resonated.... You can define it and understand it and sort of manipulate it in a way that makes sense to you and is useful to you, depending on your perspective," she told *Cross Country Checkup*.

It's also a term that has thrived among far-right groups, said Perry, one of a number of experts who say [the presence of far-right groups in Canada is growing](#).

WATCH | Trucks continue to block streets in downtown Ottawa:



Protesters in Ottawa not going anywhere

▶ 2 years ago 4:54

Trucks continue to block streets in downtown Ottawa, with their horns blasting in defiance of a court injunction, as the protest against COVID-19 public health rules stretches into its third weekend. Ottawa police say their officers were overwhelmed by aggressive behaviour from demonstrators on Friday night.

As seen among some protesters currently opposing vaccine mandates and other public health measures, freedom signals a desire for freedom from government intervention or overreach, Perry noted.

"I think it resonates very much with what we've been seeing — and maybe takes some inspiration from what we've been seeing — in the U.S. over the last year and a half or so, leading up to the last election and events of Jan. 6," she said, referring to the insurrection at the U.S. Capitol.

Protesters have gridlocked the streets of Ottawa with tractor-trailers and personal vehicles for 16 days as part of what they call the Freedom Convoy. Similar protests have sprung up across Canada in the wake of the ongoing demonstration in the nation's capital, including at international border crossings in Ontario, Manitoba and Alberta.

Convoy protesters are calling for an end to all vaccine mandates, as well as other pandemic-related restrictions. Canada Unity — one of the main organizing groups

Evan Balgord, executive director of the Canadian Anti-Hate Network, says the way many protesters frame their calls for freedom renders the word meaningless — and what they're really asking for is a shift in government policy that could potentially have a negative impact on others.

"When they're yelling they care so much about their freedom, they're taking freedoms away from other people who don't have the same kind of agency and choice that they do," he said.



A person drags a 'Freedom' banner as they walk toward Parliament Hill. The word is one that can have many interpretations — and it's part of the reason it has been embraced by many groups, according to researcher Barbara Perry. (Justin Tang/The Canadian Press)

Concept of freedom can be used to reject equality

"Freedom is a slippery concept," said Anker, an associate professor of political science at George Washington University and author of *Ugly Freedoms*, which examines the history of how freedom, as a concept, has been used in American society.

"On the far right, [individual freedom] is often translated into somebody who refuses to be bound by norms of equality, treating all people equally or norms to remedy inequality, whether that's trying to remedy racial discrimination or gender discrimination."

- [Canadian flag at convoy protests surfaces emotions of pride, anger](#)
- [ROUNDUP Multiple border crossings blocked amid Canada-wide protests against COVID-19 rules](#)

The word has been used by far-right groups as part of push-back against efforts to remedy inequality, she added.

And while those forms of "violent freedom" can result in situations that are dangerous, discriminatory or anti-democratic, the call to action can gain broader support because fighting for freedom is seen as a noble cause.

Far-right groups began appearing in Canada back in 2015, and in the years since, Perry says that anti-state rhetoric has gained more mainstream popularity.

Now, "freedom" leads social media posts about the protests, is trumpeted in memes and is even the focus of merchandise. A bumper sticker that reads "Mandate Freedom," emblazoned with a Maple Leaf, is available for sale online. So are T-shirts and hats promoting the Freedom Convoy.



A person walks by a truck with the word 'Freedom' written on the front bumper. For many who push for freedom, it can often come at the expense of others, experts say. (Lars Hagberg/The Canadian Press)

Pushing individual freedom over social good

Anker says the concept of freedom as displayed in the anti-mandate protests is something more often attributed to the United States. "Freedom is often used almost as a national entitlement, as a claim for what people have," she said.

While some in the U.S. may see mask mandates as a violation of individual rights, for example, citizens in many other countries wouldn't consider such rules to be an intrusion.

- [SUNDAY ON CHECKUP What's your reaction to the Ottawa standoff and the border blockades?](#)

In those places — and in Canada — it's likely there's a general consensus that wearing masks is for the benefit of society's most vulnerable.

"It's been taking a lot of people by surprise to see people in Canada, who often seem so much more accepting of social interdependence, to start pushing back against it with the language of individual freedom," said Anker.

Written by Jason Vermes, with files from Ashley Fraser.

This is **Exhibit « N »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive style with a horizontal line extending from the end of the name.

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[News](#) > **Former Yellow Vest Organizer Hosts Largest (And Most Perplexing) Convoy Voice Channel**

FORMER YELLOW VEST ORGANIZER HOSTS LARGEST (AND MOST PERPLEXING) CONVOY VOICE CHANNEL

Agitator and former yellow vester, Les Michaelson, created and unceasingly participated in a channel on Zello for supporters and participants of the truck convoy to Ottawa.

Posted on February 14, 2022



This was posted more than 12 months ago. The information may be outdated.

By Jack Farrell



The occupation in Ottawa has [brought out](#) no shortage of known members from Canada's far and racist right. One agitator participating in the convoy was Les Michaelson. Well known throughout Alberta, Michaelson has a history within numerous Islamophobic hate groups and movements.

In addition to being a figurehead and mainstay of the [Yellow Vests Canada movement](#), and often broadcasting live on Facebook from multiple groups and pages under his control, Michaelson [participated in](#) the *United We Roll* convoy to Ottawa in 2019.

[Speaking to the Ottawa crowd during that event](#) – clad in a neon safety wear uniform of the Yellow Vests and a "Make Canada Great Again" hat – Michaelson said they were ready to get even with the prime

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While the public faces of the 2019 convoy insisted the movement was about oil and gas – not dissimilar to the current occupation facing Ottawa – it drew more than its share of hate groups and their messaging. The anti-Muslim faux-biker club [Northern Guard](#) were spotted in attendance. Christopher Hayes, who was previously [convicted of uttering threats against Justin Trudeau](#) and a history of membership in Islamophobic hate groups, also attended.


Michaelson's involvement in the far right didn't begin or end with *Yellow Vests Canada*. He has attended rallies held by the *World Coalition Against Islam*, was an [early supporter of the COVID-conspiracy movement](#), and is a [supporter](#) of the *People's Party of Canada* and Maxime Bernier. This is just another [example of the strong ties between](#) those involved in the Yellow Vests movement and the waves of conspiracy-laden protests against public health measures.

In addition to participating in the initial "trucker" convoy – in an SUV – Michaelson also created a Zello channel for convoy participants and supporters to communicate. Zello is an app that functions like a walkie-talkie or two-way radio, allowing users to correspond with each other by voice messages, and occasionally, text messages.



The SUV Michaelson used in the convoy to Ottawa. Source: Zello

Michaelson, posting under the username “va6lm,” and a revolving door of trusted moderators kept the channel active nearly every hour of the day until, according to Twitter users who monitor the convoy related Zello channels, Michaelson changed the channel settings to only allow himself to speak.

Noelle · Feb 4, 2022 

@Noellenarwhal · [Follow](#)


Replying to @Noellenarwhal




A fantastic compilation of organizations to donate to can be found at Ram-Ranch.ca

Some beauty coming out of this

Noelle
@Noellenarwhal · [Follow](#)

Some hilarity went down last night where Les finally broke, kicked out all of the mods, and now he is the only person who can speak on his channel.

9:35 AM · Feb 4, 2022 

 **356**  **Reply**  **Share**

[Read 23 replies](#)

Before Michaelson changed the settings, moderators of the channel stated that they aimed to provide a place to “show support for the truckers” and provide “updates on what’s happening at ground zero.”

However, it appeared as though very few, if any, people listening to the channel were actually in Ottawa. Michaelson himself even stated he was only in Ottawa for the first weekend, and had been driving back to Alberta from Ontario since.



Michaelson shared this picture on Zello of him harassing somebody wearing a mask somewhere in Saskatchewan on Feb. 3. Source: Zello

Large amounts of daily air-time on the channel was dedicated to finding ways to handle the trolls who persistently interrupted any attempts at conversation.

The trolling effort included users playing pornographic audio clips, yelling “fuck you Nazis,” stoking conversations about conspiracies, and harassing Michaelson specifically.

Some dedicated users repeatedly played sexually graphic clips, creating new accounts as they were banned.

Michaelson, who seems to be ever-present on the channel, kept his cool for the most part. However, in response to a troll asking if he wanted Hitler to replace Erin O’Toole, Michaelson said “well no, he’s already Prime Minister.”

Michaelson also made some homophobic and queerphobic comments, saying, “Hey antifa I know you guys are the homosexuals out there with the cum zone or whatever but can you guys find maybe a couple of lesbians to try and troll us.”

There were many theories shared on the channel about who the trolls were. Michaelson’s theory was that, “the government gets their minions out to discredit an organization that they don’t like so, Trudeau gets his paid minions out to discredit us and try and troll us.

“If you think these are just guys sitting in their basement, no, these are government paid operatives that are out here trying to make it look like the truckers are playing gay stuff.”

While driving back to Alberta one morning, Michaelson also voiced his support of Pat King, saying, “King did indeed spend a week in Edmonton, in tipis, with native Canadians from all over Canada. I was there with him, I did a video, I saw what was happening and if Pat is racist because he thinks that white people are okay well, go figure.”

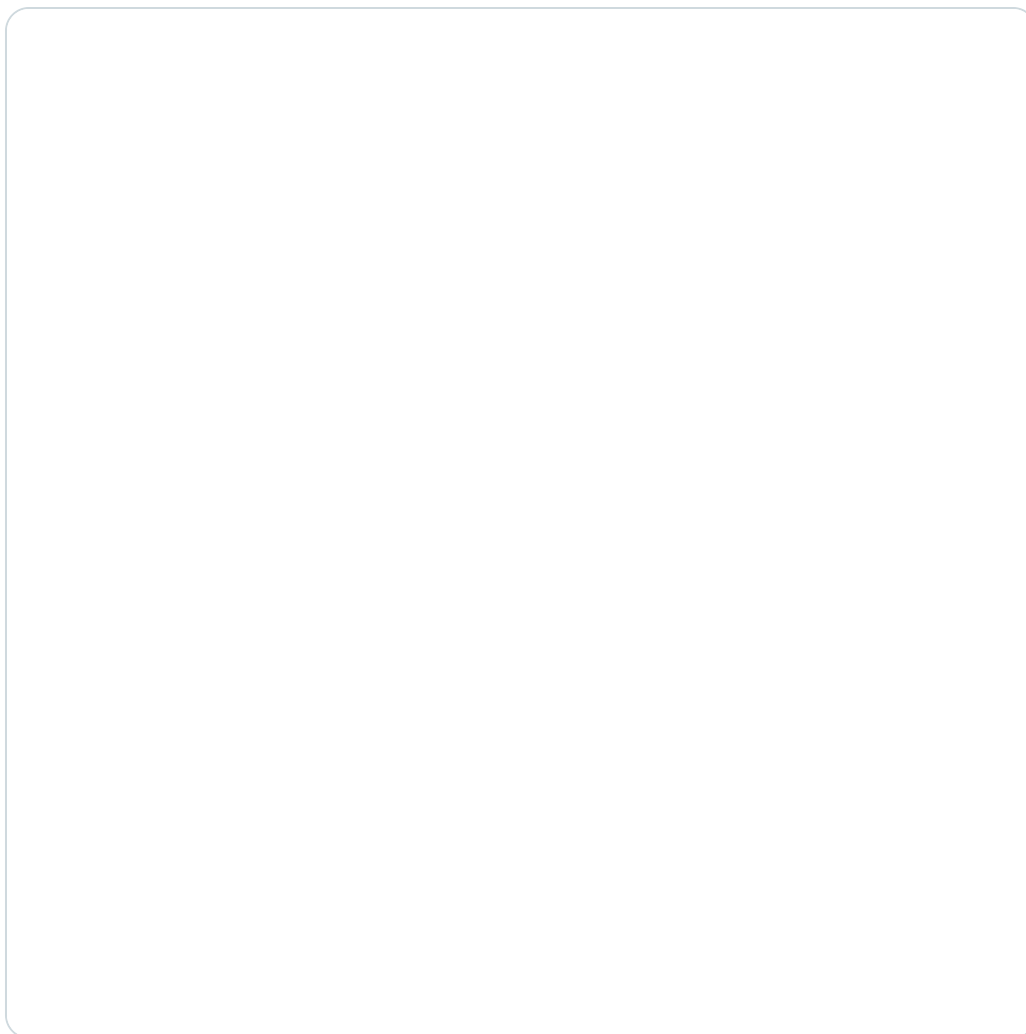
Edmonton Against Fascism (archive)



@EdmontonAgainst · [Follow](#)

Les Michaelson, CEO of Rentex, posting about running down protesters. Les was a member of the yellow vest movement in Edmonton until it died and he protested every weekend for months.

[@VestsCanada](#) [@ARCCollective](#) [@agtbloodrayne](#)



11:21 AM · Feb 13, 2020



17



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Apart from the 2019 Yellow Vests convoy, Michaelson and King have participated in [other events together](#). In 2020, they both disrupted a press conference in Ponoka, AB. Held by *Black and Indigenous Alliance AB*

Anonymous antifascist researchers from Edmonton have documented Michaelson's political activities for years. They aren't surprised he is participating in this new convoy: "[Michaelson] loves the sound of his own voice and he must feel like he has something important to say."

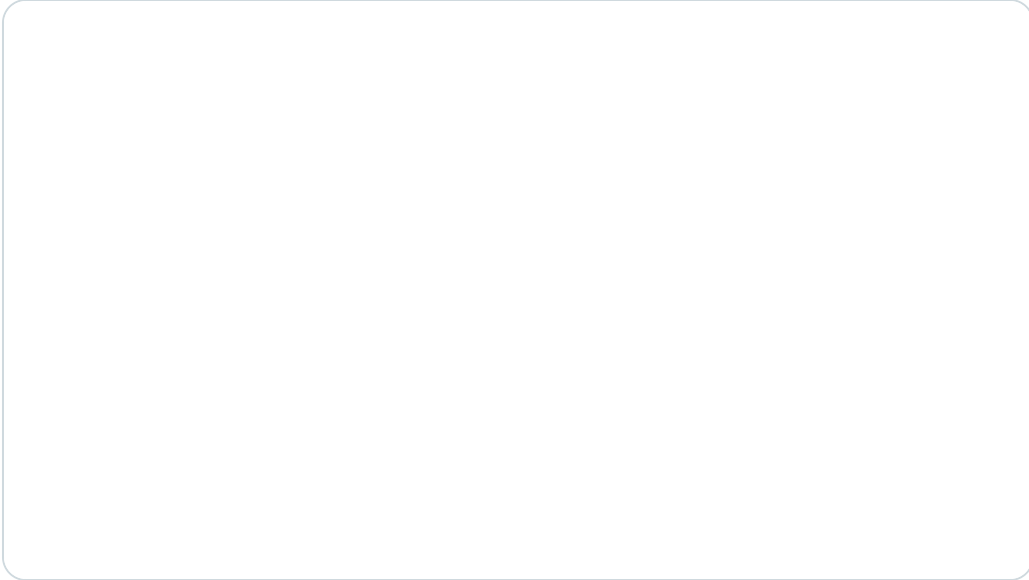
Edmonton Against Fascism (archive) 


@EdmontonAgainst · [Follow](#)




Les Michaelson, CEO of [@Rentex](#), is celebrating the outcome of the Kyle Rittenhouse trial.

In the comments, Les goes on to say that when BLM and antifa march in Edmonton, people should come out in force and "delete" them.

What do you mean, Les?



4:37 PM · Nov 19, 2021 

 **187**  **Reply**  **Share**

[Read 24 replies](#)

Michaelson and the moderators, who worked in shifts, prohibited many topics of conversation on their freedom radio program. Banned topics included Tamara Lich and the GoFundMe, anti-religious sentiments, and the discussion of politics, among other topics.

There was also an incredible amount of infighting on the channel. Many off-shoot channels were created by users who were removed or unwelcome on Michaelson's. Any mention of the other channels also resulted in users being removed.

@Noellenarwhal · [Follow](#)

Replying to @Noellenarwhal

Apparently there are CSIS decoys in here. Stay anonymous

Why would you worry about that if you're not doing anything wrong?

Noelle

@Noellenarwhal · [Follow](#)

People are talking about the ++ group. The rogue group

The mods are getting mad. The different factions do not like each other!!

The infighting is delicious!!

12:09 PM · Feb 1, 2022



247



Reply



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Other convoy supporters on the channel would occasionally sing "Oh Canada," share vaccine conspiracies, make false claims, and more. One supporter suggested that the Trudeau government was using [HAARP technology](#) to create snowfall in order to sabotage the occupation in Ottawa – a conspiracy theory of government weather manipulation.

@Noellenarwhal · [Follow](#)

Replying to @Noellenarwhal

You guys!!! GUYS!! They just made me a trusted user in this channel!!

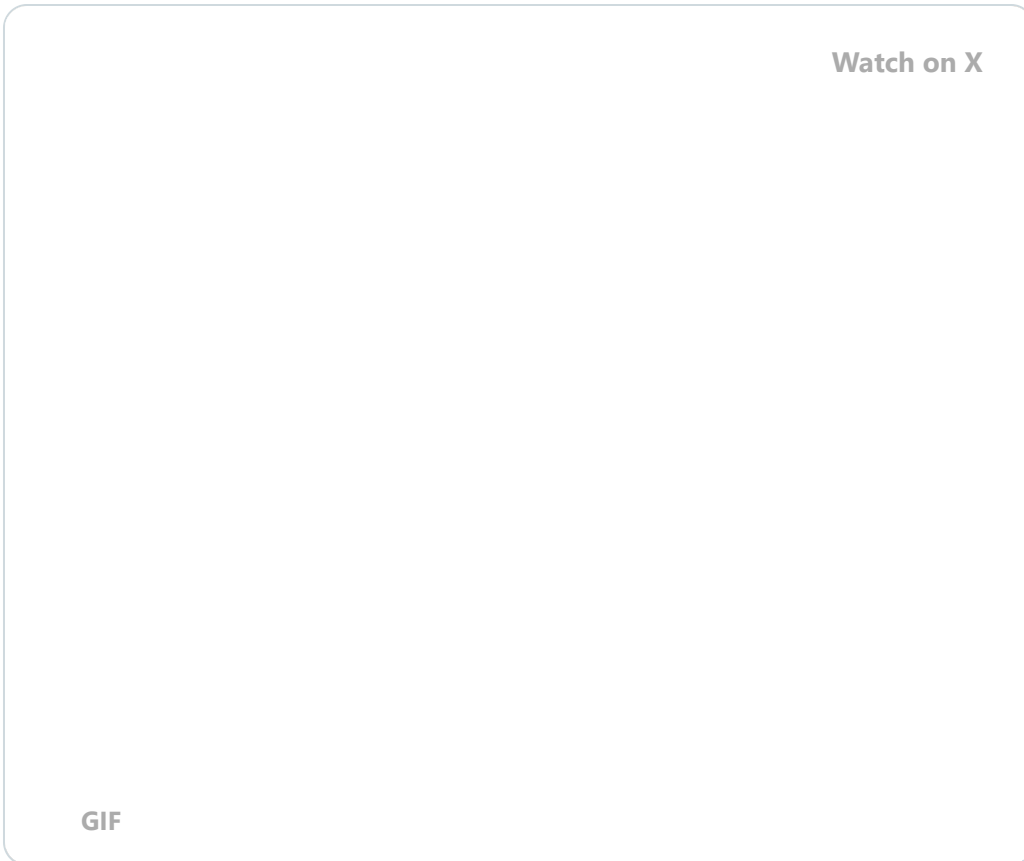
I have no idea how I pulled that off!!!

Noelle

@Noellenarwhal · [Follow](#)

One lady brought up the "questionable" weather statement

Remember when we joked about the snow being a conspiracy from big shovel?? Well they actually think that now!



3:43 PM · Feb 1, 2022



 239  Reply  Share

[Read 4 replies](#)

With this convoy radio channel Michaelson built an incredibly large platform for himself; a platform through which he shared and allowed hate speech, conspiracies theories, and an array of harmful ideas. Although the channel was created to support the convoy to Ottawa, people from around the world had joined the

“Trudeau just doesn’t listen, he’s only out for his liberal friends and the globalists that want Canada to do what the globalists want us to do,” Michaelson said one evening, referencing the globalist conspiracy theory.

The moderators and dedicated listeners placed Michaelson on a pedestal, and refrained from questioning his ideas or decisions.

In the morning of February 4, Michaelson arrived at the Coutts border crossing, saying to listeners, “we’ll be going down there and doing some video, and we’ll see what happens.”

“That’s it, thank you for this morning,” Michaelson said as he signed off for the time being.

Despite Michaelson barely speaking throughout Feb. 4 (because he was live streaming on his Twitch channel) a fluctuating, but significant, number of listeners were still tuned in, waiting for his next message.

Michaelson has since returned to his home in Edmonton, and participated in the protest downtown on Feb. 5. Michaelson stood through the sunroof of the moving SUV and spoke through a megaphone as he drove around the downtown core.

“Do you have freedom? Where is your freedom? Trudeau has your freedom!” Michaelson yelled to nobody in particular.

Michaelson did not respond to a request for comment.

LATEST NEWS



May 30, 2024

OTTAWA MAN BEHIND ANTISEMITIC POSTERS AND STICKERS SENTENCED TO 18 MONTHS HOUSE ARREST

After putting up approximately 80 antisemitic posters and stickers in 20 locations throughout Ottawa, Paul Koppe has been sentenced to over a year of home confinement.



May 29, 2024

WHITE NATIONALIST CLAIMS AN INVITE TO LOCAL CONSERVATIVE RIDING ASSOCIATION BOARD OF DIRECTORS

During a neo-Nazi conference call, Nova Scotia man Cullen Carver bragged about an invitation to join the board of a riding association being the first step towards his goal of entering federal politics.



May 23, 2024

FREEDOM CONVOY ORGANIZER IDENTIFIES HERSELF AS A “WHITE NATIONALIST” IN CONFERENCE CALL WITH NEO-NAZIS

In the recording, Bethan Nodwell denied the Holocaust, remarked how her relationship with her Jewish business partner with Trinity Productions had

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A Commissioner of Oaths, etc.

Hate symbols at convoy pro urgency for online hate legis advocacy group, NDP

Advocacy organizations are awaiting overdue legislation intended to address online hate, which was promised in the Liberal election platform in September 2021.



Canada's Heritage Minister Pablo Rodriguez released a report on Feb. 3, 2022, describing the results of a consultation process between July and September 2021 related to developing legislation to combat online hate. *The Hill Times* photograph by Andrew Meade

NEWS | BY JESSE CNOCKAERT | February 14, 2022



The display of hate symbols, including swastikas and the Confederate flag, in Ottawa during the truck convoy protest is fuelling the need for the Liberal government to move forward on legislation to combat online hate speech, according to non-profit organizations and advocacy groups.

“We are having more attention on the issues of hate because of the trucker convoy. We’re having more conversations about it, then I can remember at any other point,” said Evan Balgord, the executive director of the Canadian Anti-Hate Network, an organization that monitors hate groups and hate crimes.

“The convoy gathering together is the largest kind of far-right activity that Canada has seen in the past 50 years. It’s extremely concerning to people”

Hundreds of protesters and truckers, dubbed the “Freedom Convoy,” have been in downtown Ottawa and in the Parliamentary Precinct since Jan. 28 with some protesting vaccine mandates for truckers crossing the Canada-US border, and others protesting pandemic restrictions in general, and others protesting against the prime minister. Speaking in the House of Commons on Feb. 7, Prime Minister Justin Trudeau (Papineau, Que.) [said the demonstrations](#) have crossed a line, and that the people of Ottawa don’t deserve to be confronted with images of the swastika or Confederate flag which have been displayed by some of the protesters.



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The Canadian Anti-Hate Network argues in a Feb. 4 [press release](#) that supporters of the protest are victims and perpetrators of misinformation, and

platforms. Online harm legislation may be able to disrupt the pipeline of misinformation, according to the press release.

RELATED STORIES

The Trudeau government promised in its September election campaign platform that it would introduce legislation intended to combat harmful content online within 100 days of re-election, which has not yet occurred.

Online Harms Act a ‘step in the right direction,’ but social justice and civil society advocates united in commendation and concern

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Feds try to tackle online harms

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A promise made, a promise broken: what is the government doing about online hate?

Heritage Minister Pablo Rodriguez (Honoré-Mercier, Que.), along with Justice Minister David Lametti (LaSalle-Émard-Verdun, Que.) and Minister of Public Safety Marco Mendicino (Eglinton-Lawrence, Ont.), [released a report](#) on Feb. 3, detailing the findings of a consultation process between July 29 and Sept. 25, 2021, with representatives of social media platforms, industry, and other members of the public to discuss possible legislation and a regulatory framework to contend with harmful online content.

Rodriguez’s press secretary, Laura Scaffidi, sent an emailed statement to *The Hill Times* on Feb. 10, which said Rodriguez is committed to working with Canadians to address the issues raised during the consultation.

“This legislation is important to many communities and all Canadians. In recent years, we’ve seen how corners of the Internet have become radicalized,” said the emailed statement. “We’re working quickly, and we’re going to get this right.”

Some respondents during the consultation process raised concerns regarding a proposed “take-down” period, wherein online platforms would be required to respond to flagged content within 24-hours, according to the report. Respondents argued that a requirement to respond within 24-hours would result in online platforms becoming over-vigilant, and incentivize over-removal of content to avoid non-compliance.

A bill related to online hate from the previous session of Parliament was the former Bill C-36, which included proposal to amend the Canadian Human Rights Act so as to regard the communication of hate speech using the Internet as a discriminatory practice. The bill, introduced on June 23, 2021, died on the Order Paper in August 2021 when Parliament was dissolved for the September federal election.

Chantalle Aubertin, a spokesperson in the office of Justice Minister David Lametti (LaSalle—Émard—Verdun, Que.) said in an emailed statement to *The Hill Times* on Feb. 10 that introducing the former Bill C-36 was a first step in making the online public space safe and accountable.

“Canadians deserve to feel safe and protected in every space they inhabit, including online. Yet, too many, particularly Indigenous peoples, Black, Jewish and other racialized Canadians continue to be harmed and victimized by hate speech and hate crimes,” said Aubertin in the emailed statement. “There should be clear lines between respectful public debate, which is vital to democracy, and the hateful rhetoric that has amplified online and has become more severe and frequent.”

Lametti was directed in his Dec. 16 mandate letter to work with Rodriguez to introduce legislation “as soon as possible” to combat serious forms of harmful



Richard Marceau, the vice-president of external affairs for the Centre for Israel and Jewish Affairs, says seeing Nazi swastikas and Confederate flags in Ottawa was 'jarring for a lot of people.' Photograph courtesy of Richard Marceau

Richard Marceau, the vice-president of external affairs for the Centre for Israel and Jewish Affairs (CIJA) and a former Bloc Québécois MP, told *The Hill Times*, that the former Bill C-36 is a small part of a larger remedy needed to address online hate.

“There is a strong recognition by a significant majority of Canadians that online hate is an issue that has to be combated and they’re expecting action from the government,” said Marceau. “It was the issue of seeing Nazi swastikas and Confederate flags flying in the heart of Canada’s capital. That

was jarring to a lot of people.”

Marceau argued that legislation to combat online harm must be worded carefully so it can only be used as a shield against online hate, and not as a sword that will threaten free speech. CIJA participated in the consultation process for online harm legislation, and recommended that an independent regulator be appointed to combat online hate, with the role of ensuring impartial decisions.

Another bill related to addressing the spread of hate, Bill C-229, was introduced on Feb. 3 by NDP MP Peter Julian (New Westminster-Burnaby, B.C.). The bill aims to prohibit the display or sale of symbols or emblems including the Nazi swastika, the Ku Klux Klan’s insignia, and the Confederate flag.

Marceau argued similar care will be required in moving forward with Bill C-229, because some symbols associated with hate can have additional meanings. As an example, the swastika is also a holy symbol used in the Hindu tradition, and is sometimes inscribed on Hindu temples and altars, according to Marceau.

NDP MP Blake Desjarlais (Edmonton Griesbach, Alta.), his party’s diversity and inclusion critic, and deputy critic of 2SLGBTQI+ rights, said in an emailed statement to *The Hill Times* on Feb. 10 that “hate is very much a problem in Canada.” As examples, he cited the hate symbols displayed at the truck convoy, and an event from 2020 involving a fatal attack against a Muslim family in London, Ont. The Afzaal family was out for a walk On June 6, 2020, when they were struck by a truck that jumped the curb, resulting in the deaths of Salman Afzaal, his wife Madiha, their daughter Yumna, and Salman Afzaal’s mother, Talat Afzaal. Nathaniel Veltman is accused of deliberately hitting the Afzaal family with his truck. The case received a preferred indictment on Jan. 21, meaning the preliminary hearing will be skipped, [as reported](#) in CBC News on Feb. 9.



NDP MP Blake Desjarlais, says 'hate is very much a problem in Canada.' Photograph courtesy of Twitter

action to fight the rising tide of hate in Canada, said Desjardis in the emailed statement. “The Liberals allowed their Bill, C-36, to die when they called an early election, and have broken their promise to re-introduce the legislation about online hate within 100 days. What kind of leadership is that? Promising consultations and actions in the future isn’t helping people who have lost loved ones and surviving through hate crimes right now.”

Jcnockaert@hilltimes.com



See all stories BY [JESSE CNOCKAERT](#)

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A Commissioner of Oaths, etc.



Loberg Ector LLP
2525 Encor Place
645 – 7th Avenue SW
Calgary AB T2P 4G8

Main: (403) 457-6680
Fax: (403) 668-6505
Email: Media@lobergector.com

PRESS RELEASE

FOR IMMEDIATE RELEASE

February 14, 2024

Re: Loberg Ector LLP Announces Legal Proceedings Against the Trudeau Government
Edward Cornell et al v. Justin Trudeau et al (CV-24-00094733-0000)

Today Loberg Ector LLP commenced proceedings in Ontario Superior Court of Justice (Ottawa) on behalf of 20 victims of the Trudeau government's unconstitutional misuse of the provisions of the *Emergencies Act* in February, 2022. The Plaintiffs in this action seek compensation and related relief arising from the unjustified and unconstitutional actions of the Liberal government, as well as the actions of certain police agencies and Canadian financial institutions who followed the unlawful orders of the Liberal government, and other defendants who participated in or promoted these actions.

A democracy is only as strong as its commitment to the rule of law, and when a government decides that it's not bound by the law of Canada, the resulting unlawful action not only breaks the law, it undermines and degrades the very democracy that put that government in power in the first place. These unlawful actions also undermine the integrity of our community and tells Canadian citizens that they can no longer rely on the government to protect our liberty and freedom, but instead they should be fearful of a government that considers themselves unrestrained by the rule of law.

This is not about any single instance of free speech, or any particular protest, and it specifically does not matter how anyone feels about the Freedom Convoy Protest. What matters is the obligation the government has to the people of this nation to obey the law. This litigation is about that obligation.

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Blair Ector, one of the firm's founding partners, commented:

“As Canadians and as lawyers we carry a duty to protect the things we value. Highest amongst these things are the freedoms that define our nation, and these freedoms cannot be allowed to be extinguished by our government. John Diefenbaker said it well with his famous quote, *‘I am a Canadian, free to speak without fear, free to worship in my own way, free to stand for what I think right, free to oppose what I believe wrong, or free to choose those who shall govern my country. This heritage of freedom I pledge to uphold for myself and all mankind.’* These are values my firm will fight to protect.”

Please watch for further information about this important case in the coming days. For additional reference materials please see the following linked materials and resources:

Notice of Action: [Edward Cornell et al v. Justin Trudeau et al \(Notice of Action\)](#)
Judgment: [Jost et al v. Attorney General of Canada et al \(Judgment\)](#)
Firm Website: [Loberg Ector LLP](#)
Plaintiff Website: [The Accountability Project](#)
Plaintiff Funding: [TAPCAN Donations](#)

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Loberg Ector LLP**

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The Accountability Project is a federal non profit, with a mandate to advocate for human rights, including raising funds for public interest plaintiffs and class action law suits

The Accountability Project Launch



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The Accountability Project Launch
Video Link

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Dr. Regina N. Watteel

Newsletter

Dr. Regina N. Watteel holds a PhD in Statistics from the University of Western Ontario, an MSc in Statistics from McMaster University (Mac), and a BSc in Mathematics and

Physics, also from UBC. She has served as a consultant to medical practitioners, social scientists and various levels of government in Canada. Regina also served as the principal statistician for an Ottawa-based economics consulting firm that specialized in econometrics, program evaluation, business case development and risk-benefit-options analysis. She has taught both undergraduate and graduate level university courses in multivariate statistical analysis, data analysis and engineering statistics.

Dr. Watteel's career path took a dramatic turn following a motor vehicle accident in which a substance impaired driver plowed into her while she was loading groceries into her vehicle. Ultimately, she stepped down from her position to focus on rehabilitation, health and her three children.

During the pandemic, concerns over the censorship of important scientific information and a government course of action that seemed to be moving in a direction of maximal harm and risk prompted her to speak out against lockdowns and vaccine mandates, and to run as a candidate in the 2021 federal election for Ottawa Center. She has been outspoken about the need for transparency and the importance of adhering to a rational, evidence-based approach to the pandemic that is open to scrutiny. Regina is an advocate for the restoration of scientific integrity in this country, and is the author of the best-selling exposé *Fisman's Fraud: The Rise of Canadian Hate Science*.



Newsletter

This is **Exhibit « T »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

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Cornell et al v. Trudeau
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Emergencies Act damages claim

Represented by **Loberg Ector LLP**

Plaintiffs
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Defendants
Coming Soon.



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Newsletter

This is **Exhibit « V »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive style with a horizontal line underneath it.

A Commissioner of Oaths, etc.



This campaign is unpublished.

The Accountability Project (TAP) give send go campaign will be re-published again in the near future. Once the agreement has been finalized between the plaintiffs and TAP, stay tuned.

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This is **Exhibit « W »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive style with a long horizontal stroke at the end.

A Commissioner of Oaths, etc.



Jeff Saikaley
T 613-564-8268 | F 613-565-2087 | jsaikaley@plaideurs.ca

BY EMAIL

April 25, 2024

Blair D. Ector

Loberg Ector LLP
2525 Encor Place, 645- 7 Ave SW
Calgary, AB T2P 4G8

Dear Mr. Ector:

RE: CV-24-00094733 and CV-24-00095074

We have been retained by the Canadian Anti-Hate Network and Bernie Farber with respect to the above-noted actions. Although they have not been properly served, our clients have been made aware of the litigation against them and have retained us to respond to the action.

It appears that instead of filing a Statement of Claim following the issuance of the Notice of Action in the 94733 file, your clients issued a new claim bearing Court file number 95074, contrary to the *Rules of Civil Procedure*. As a result of this irregularity, it is unclear to us which claim is being advanced. In our view, the 94733 matter is now a nullity since, to our knowledge, no Statement of Claim was issued within the 30-day period.

In any event, you will find attached a Notice of Intent to Defend, a Notice of Motion brought pursuant to s. 137.1 of the *Courts of Justice Act*, and a Long Motion Request Form. We will be filing these documents with the Court later today. Pursuant to s. 137.1(5), no further steps are to be taken in the proceeding until this motion has been disposed of. We will be canvassing dates for our motion and will confer with you on the available dates.

We ask that you provide us with the names of any counsel that have been appointed to represent the various defendants, so that we can provide them with a copy of our motion materials.

Yours very truly,

CAZA SAIKALEY S.R.L./LLP

Jeff Saikaley

c.c. Albert Brunet (Caza Saikaley LLP)

Encls. Notice of Intent to Defend
Notice of Motion
Long Motion Request Form

This is **Exhibit « X »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive, somewhat stylized font.

A Commissioner of Oaths, etc.

From: [Blair Ector](#)
To: [Albert Brunet](#); [Loberg Ector LLP Court Service](#)
Cc: [Jeff Saikaley](#); [Sacha Van Loon](#)
Subject: RE: CV-24-00095074 - Cornell et al. v Trudeau et al.
Date: Monday, April 29, 2024 4:07:13 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

External Email – Confirm Sender and Beware of Links and Attachments

Mr. Brunet,

No one has been served.

Kind regards,



Blair D. Ector
Founding Partner

Direct: +1 (403) 917-0465
Office: +1 (403) 457-6680
Fax: +1 (403) 668-6505
Email: bector@lobergector.com

Loberg Ector LLP
2525 Encor Place
645 – 7th Avenue SW
Calgary AB T2P 4G8

This email is confidential and solicitor-client privileged.



From: Albert Brunet <ABrunet@plaideurs.ca>
Sent: April 29, 2024 1:26 PM
To: Loberg Ector LLP Court Service <service@lobergector.com>
Cc: Jeff Saikaley <JSaikaley@plaideurs.ca>; Sacha Van Loon <svanloon@plaideurs.ca>
Subject: RE: CV-24-00095074 - Cornell et al. v Trudeau et al. [CAZA-2792]

Good afternoon,

I am following up on the below, specifically the request to provided with any other Notice of Intent to Defend or the contact information of any other counsel that may have been appointed by the other Defendants.

Regards,

Albert

Albert Brunet

Avocat / Lawyer

Caza Saikaley srl/LLP
Suite 1420 - 220 rue Laurier Avenue ouest/West
Ottawa, ON K1P 5Z9

T: 613-564-8281



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From: Albert Brunet

Sent: Thursday, April 25, 2024 10:25 AM

To: service@lobergector.com

Cc: Jeff Saikaley <JSaikaley@plaideurs.ca>; Sacha Van Loon <svanloon@plaideurs.ca>

Subject: CV-24-00095074 - Cornell et al. v Trudeau et al. [CAZA-2792]

Good morning,

We represent the Defendants, CAHN and Bernie Farber in the above noted matter.

Please find attached the following documents, served upon you pursuant to the *Rules of Civil Procedure*:

- A letter of today's date.
- CAHN and Mr. Farber's Notice of Intent to Defend.
- CAHN and Mr. Farber's Notice of Motion pursuant to s. 137.1 of the CJA.
- Long Motion Request Form.

The last two documents will be sent to the Associate Judge's office in accordance with local practice. We will copy you on that email.

As raised in Mr. Saikaley's letter, please provide us with any other Notice of Intent to Defend or the contact information of any other counsel that may have been appointed by the other Defendants.

Regards,

Albert

This is **Exhibit « Y »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive, somewhat stylized font. It is positioned above a horizontal line.

A Commissioner of Oaths, etc.

Richard Warman

- and -

the Canadian Anti-Hate Network

v.

Kevin Goudreau

In the matter of an application for a peace bond under s. 810 of the Criminal Code.

Information

I, Richard Warman, of the City of Ottawa, in the Province of Ontario make oath and say:

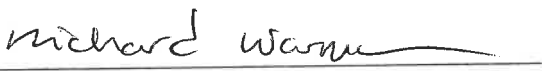
1. I have personal knowledge of the facts and matters herein referred to by me except where indicated to be on information and belief, and where so stated I verily believe them to be true.
2. Kevin Goudreau (DOB: 3 October 1975) (Goudreau) of Peterborough, Ontario has a long history of involvement in the neo-Nazi movement dating back to the 1990s by his own admission. He has a swastika tattoo on his chest under smoking shotgun barrels and a wolf. Goudreau was involved with the violent Canadian neo-Nazi Heritage Front and claims to have been active with the violent US-based White Aryan Resistance. Attached as Exhibits A and B are a 2011 National Post article and an online 2017 interview Goudreau had with a neo-Nazi group.
3. Since at least 2008, I have received and/or viewed personally information about online activity by Kevin Goudreau in which he seeks and posts personal information about individuals involved with anti-racism work and/or threatens/incites violence against those he perceives to be his enemies.
4. By way of example, in 2008 I was forwarded information that Goudreau established a secret Facebook group in 2008 in which he sought help from like-minded individuals to build a database of information about anti-racism activists. Goudreau is identified as the creator of this group. Attached as Exhibit C are the initial pages of that effort.
6. On 6 April 2012, Goudreau posts material to Facebook arguing in support of euthanizing the disabled.

7. On 21 May 2012, Goudreau posted material to his Facebook profile indicating that he was “going on a race traitor and mud killing spree”. Based on 30-years of monitoring the neo-Nazi movement, I know that the term ‘race traitor’ is used in the neo-Nazi movement to refer to whites who have relationships with non-whites. Similarly, the term ‘mud’ is used to refer to non-whites.
8. On 23 May 2012, I brought these postings to the attention of Durham Regional Police Service noting my concerns were heightened by the fact that far-right terrorist Anders Breivik had echoed language used by Goudreau when he murdered 77 people in Norway. Attached as Exhibit D is a copy of the complaint to police including the screenshots above. I have blacked out the email addresses of the cc recipients for their protection. I am not aware of any criminal charges having been laid as a result of the complaint.
9. On 14 October 2012, Goudreau indicates on Facebook that he has once again been banned by Facebook as a result of his postings. Goudreau notes he’s been banned repeatedly and then makes bigoted threats to knife and murder Facebook owner Mark Zuckerberg and Jews generally. Goudreau offers a reward of \$10,000 to anyone who provides him with Mark Zuckerberg’s home address. Goudreau then makes a post threatening death to Dr Abbee Corb who was a civilian researcher working with a number of Ontario municipal police force hate crime units. Goudreau posts “To Abbee Corb You’re on our hit list b****.” [sic] Attached as Exhibit E are copies of those posts.
10. On 14 October 2012, I reported the posts above to the Durham Regional Police Service urging them to charge Goudreau with uttering threats and the wilful promotion of hatred. Attached as Exhibit F is a copy of that complaint. I have blacked out the list of email addresses for media that were cc’d on that message for their protection.
11. Pursuant to this complaint, I was asked by Durham Regional Police to swear out an affidavit in support of my complaint. Attached as Ex G is a copy of this affidavit. To my knowledge, no criminal charges were ever laid against Goudreau as a result of this complaint.
12. On or shortly before 13 August 2018, I became aware that Goudreau had again made posts threatening to “carve a swastika” in the face of the leader of a Jewish group in Toronto. In a video that appeared at the same time, Goudreau makes further threats of violence while speaking about drinking and appears to be visibly intoxicated. At the end of the video, a woman’s voice yells at him to stop as he was launching into a tirade of further bigoted comments. The video is available at the top of a posting to an anti-racism website here: <http://anti-racistcanada.blogspot.com/2018/08/cancelled-wcai-toronto-rally.html>.
13. On 13 August 2018, I filed a criminal complaint with the Durham Regional Police Service as a result of Goudreau’s most recent threats. Attached as Exhibit H is a copy of the complaint that includes screenshots of the threats above.

14. Durham Regional Police Service subsequently indicated that Goudreau now lived in Peterborough and that I should direct my complaint to the Peterborough Police Service which I did that same day. To the best of my knowledge, no criminal charges were ever laid as a result of this complaint.
15. On 15 March 2019, a terrorist attacked mosques in Christchurch, New Zealand murdering 51 people.
16. On 18 March 2019, Goudreau made Facebook posts to both his personal Facebook account and to the Canadian Nationalist Front of which he purports to be the leader. Goudreau's posts state that in the wake of the Christchurch terrorist attack, we are now in a state of "Racial Holy War" or RAHOWA as it is sometimes shortened to. Goudreau suggests what he describes as "priority targets" for execution to his readers including CSIS, the CBC, human rights commissions, and the Canadian Anti-Hate Network of which I am one of a three-member Board of Directors. Goudreau mentions using bullets and recommends that any of his readers who engage in such copycat terrorist attacks should:

Remember always double tap both hemispheres of the brain because some people survive a bullet to the head. bombing is combersom and clumsy, to much potential for collateral damage of innocent people getting hit by shrapnel etc. [sic]
17. On 18 March 2019, I filed a criminal complaint with the Peterborough Police Service cc'ing the Chief of Police and the Mayor of Peterborough. Attached as Exhibit I is a copy of the criminal complaint along with the Goudreau screenshots that led to it. Goudreau subsequently denied writing the posts but given they were posted to two separate accounts of his and his long history of the same conduct spanning at least the past 11-years, I believe this is simply attempting to escape responsibility for his actions. The Peterborough Police Service has indicated to me that it is not their intent to lay criminal charges against Goudreau for the posts.
18. On 8 April 2019, Facebook deleted Goudreau's latest account although Goudreau has always reappeared by simply using a different name or spelling.
19. In light of the history described above, I have lost all faith in the police taking any action to lay criminal charges in response to Goudreau's repeated threats and incitement to violence.

20. I have previously reported Goudreau's threats of violence against others because it is my duty as a citizen and especially as a lawyer to protect the safety of others and uphold the law. Kevin Goudreau's latest Facebook postings on 18 March 2019 in the wake of the Christchurch terrorist attack where 51 people were murdered have now caused me to be concerned for my personal safety from Goudreau or any other person who may take action as a result of Goudreau counselling and inciting violence against me and my colleagues at the Canadian Anti-Hate Network.
21. As a result, I swear this affidavit/information in support of a peace bond against Kevin Goudreau under s. 810 of the Criminal Code.
22. If a peace bond is issued, I believe the following conditions would be appropriate:
- i. Keep the peace and be of good behaviour;
 - ii. Not communicate threats of violence either directly or indirectly whether online or through any other means;
 - iii. Abstain from the consumption of alcohol or other intoxicating substances or drugs, except in accordance with a medical prescription;
 - iv. Not come within 200m of any event where the Canadian Anti-Hate Network is indicated as being involved;
 - v. Not to contact directly or indirectly Richard Warman, Bernie Farber, Amira Elghawaby, Evan Balgord, or any other officer or director of the Canadian Anti-Hate Network identified on the Canadian Anti-Hate Network website (www.antihate.ca);
 - vi. Not to possess any firearm, cross-bow, prohibited weapon, restricted weapon, prohibited device, ammunition, prohibited ammunition, explosive substance and to surrender any such items already in his possession to the Peterborough Police Service within 48-hours of a peace bond coming into effect; and,
 - vii. That any firearm Possession and Acquisition License is cancelled for the duration of the peace bond and any such license already in his possession must be surrendered to the Peterborough Police Service within 48-hours of a peace bond coming into effect.


Richard Warman

Sworn before me at Ottawa
28 May 2019



Katie Black
Barrister, Solicitor, and Commissioner of
Oaths for the Province of Ontario

LSD: 59271W

Caza Saikaley
220 Laurier Ave. West, Suite 350
Ottawa, ON K1P 5Z9
Tel: 613 565 2292
Fax: 613 565 2087

A

NATIONAL POST

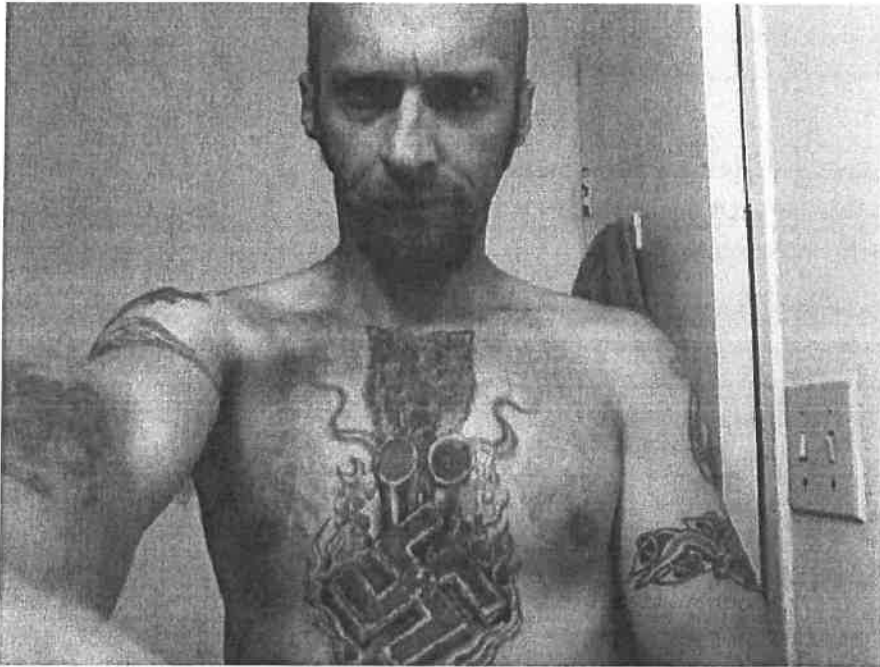
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This is Exhibit "A" to the Affidavit of Richard
Warman sworn in the City of Ottawa
this 28 day of May, 20 19



Commissioner of affidavits, etc.

A hater among us



Facebook



STEWART BELL

August 6, 2011
9:30 AM EDT

Filed under
News > Canada

 Facebook

 Twitter

 Reddit

 Email

Kevin Goudreau's blue golf shirt is buttoned to the collar. Were it not, heads would surely be turning, because there is a large tattoo of a swastika on his chest.

He keeps it under wraps during a recent interview, but it is on the Internet for all to see, along with photos of him blanketed in a Nazi flag and with his arm raised in the Nazi salute.

The Oshawa, Ont., drywaller is the leader of the White Nationalist Front, which wants to turn Canada into a white homeland by deporting millions of Canadians of other skin colours.

While Mr. Goudreau does not consider the Norwegian far-right terrorist Anders Behring Breivik an ideological peer, the similarities in their online writings are hard to ignore.

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date 2011!

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Attacker Tyler Boyd switches to US from New Zealand

primary threat to their Utopias: while Breivik sees Muslim immigrants as the problem, Mr. Goudreau wants all non-whites expelled.

"I feel that Canada's makeup should be predominantly white European," he said, adding that would be accomplished through "basically the repatriation of Third World immigrants back to their country of origin."

[np-related]

Valencia grabs final Champions League spot in Spain

Although Mr. Goudreau claims to represent "a lot of Canadians," the WNF blog has just eight members, one of whom is Mr. Goudreau himself.

Few have visited his blog, and some of those are almost certainly police and anti-racism activists keeping an eye on him. But as Norway showed, it only takes one to commit terrorism.

Kenai Peninsula educators mull strike after labour talks fail

"If one of these people crosses the line, they can cause a lot of problems to innocent people," said Detective Sergeant Don McKinnon, a retired London Police Service officer who spent years investigating Canadian hate groups.

"There are lots of lone-wolf people out there that are just on the edge but they haven't done anything yet."

France's Le Pen predicts historic vote for populist parties

Canada's racist far-right is not what it was in the 1980s, when the Canadian Ku Klux Klan had an office in downtown Toronto and the now-defunct Heritage Front formed in an attempt to unite white supremacists across the country.

But there are clearly still believers out of step with Canada's multicultural reality. On Monday, Immigration Minister Jason Kenney issued a statement condemning anti-immigrant posters produced by a racist group that had appeared in Calgary.

50 arrested, guns and drugs seized in Waterbury bust

Last month, a coroner's inquest was held in Nanaimo, B.C., into the 2009 police shooting of Jeffrey Hughes, who was allegedly active in the Northwest Front, which wants to establish a white homeland in the Pacific Northwest.

In Winnipeg, two children were seized by the province in 2008 after case workers visited their home and found neo-Nazi symbols and flags. One of the children had been sent to school with a swastika drawn on her arm.



hospital after being stabbed during morning mass at Montreal's St. Joseph Oratory



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out there that are that extreme, and they think that this is the way to get something done. And there's no real, accurate way to keep tabs on them all."

Like extremists of all stripes, racist groups have gravitated to the Internet. Mr. Goudreau said members of his group "try to get the word out on the Internet and try to do as much networking as we can." He has also posted his opinions on YouTube under the name Aryangod, and on Stormfront, a U.S. web forum run by former Ku Klux Klansman Don Black.

Professor Abbee Corb, a Canadian expert on hate and extremism, recently interviewed 100 white supremacists for a paper commissioned by Google Ideas, titled *Into the Minds of Mayhem: White supremacy, recruitment and the Internet*.

"Although the full scope of their success cannot yet be measured, the evidence from this study suggests that the Internet has become a leveraged tool for white supremacist recruitment and radicalization of the young," the study concludes.

So could a Norway-type attack happen in Canada? Mr. Goudreau thinks so.

"A lot of people, like this guy perhaps, don't feel that change is happening quick enough and kind of see the future as bleak.... So they feel that they have to take it upon themselves to do something drastic."

He was quick to point out that he does not advocate violence, and his blog also makes that same point. "We don't want to be linked in with that kind of behaviour," he said. "I can understand, like, the frustration, perhaps. Like I said, the feeling of helplessness. That there's nothing we can do. And things aren't happening fast enough. And you want to make some kind of statement.

"But this guy's obviously a sick individual and perhaps mentally ill. It's one thing to make a statement and attack a symbol, but to bomb a building when people are there or shooting students, that's just ridiculous. It doesn't make any sense to us."

Mr. Goudreau is a long-time figure in Canada's racist movement. He said he was active in the Heritage Front, whose leader Wolfgang Droege, a convicted mercenary and drug trafficker, had compiled a hit list that included prominent Jewish community members. The

LATEST NEWS

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50 arrested, guns and drugs seized in Waterbury bust

One man dead in farmhouse fire in Huron County, Ont., provincial police say

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Zundel of incitement.

The WNF was formed five years ago, Mr. Goudreau said. He will not say how many members or supporters he has accumulated. Photos on the Internet show him with Paul Fromm, who lost his Ontario teaching licence for speaking publicly against non-white immigration.

"Eventually we'd like to become a political party under a different name, perhaps," Mr. Goudreau said, although Mr. Fromm ran for Parliament in Calgary in May and picked up only 193 votes out of more than 63,000 cast in his riding. In the meantime, he operates a blog that calls for "a return to Canada's original White-European ethnic make up" and rails against what he calls Canada's "anti-white/pro-left wing/pro-non-white immigration policies."

Mr. Goudreau would not talk about his arrests. "I don't want to discuss it. I don't really have a large record," he said, adding that he had never been charged in relation to his "white nationalist" activities.

He said the Toronto police intelligence unit had informed him he was under surveillance. The officers said "that they've been following me and that they know who I talk to and where I go," he said. Anti-racist activists appear to keep close track of him, and have made him a target of ridicule on the web.

"In Canada a lot of us feel kind of oppressed in the sense that when we try to speak out, or there's events or issues that we're trying to tackle and make public, there tends to be a lot of media blackouts, of course," he said.

"And then you have the human rights commission persecuting white nationalists for certain statements they make. Basically it's like 1984. You have the thought police. We're basically being monitored, persecuted for certain beliefs or allegiances. And so a lot of people feel like they have to go underground and resort to more, I guess what you'd call more desperate action."

National Post
sbell@nationalpost.com

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Watch From Elton John to Rush Limbaugh, a who's who of some of Conrad Black's defenders

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Watch 'The fight of your life': In a Postmedia exclusive, Mark Norman tells his side of the story

Norman was in his kitchen in April 2017 when his wife Bev, astonished, called out to him. 'I think the prime minister was just talking about you'



Watch Mark Steyn: Smuggling Conrad Black over the border was always my Plan B

I'd advised Lord Black to climb into the back of my pick-up, I'd throw a tarp over him and drive ...

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This is Exhibit "B" to the Affidavit of Fichard
Walman sworn in the City of Ottawa
this 28 day of May, 2019

Saturday, 29 April 2017

Interview with Kevin Goudreau...Chairman, Canadian Nationalist Front



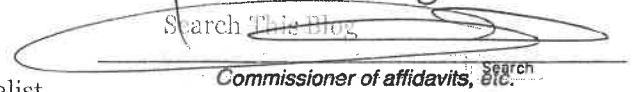
When and why did you first become awake and want to do something to help ensure the survival and expansion of the White Race?

I first became awake in the 1980s, always had an affinity for what's right and racial loyalty, I was anti-third world immigration etc. In 1990 is when I became active. I was always racially and politically aware but this new wigger fad of rap music and baggy pants, then watching Headbangers and friends join this fad because it was cool is what got me active. I decided to put a stop to it and show people what they were doing is wrong. At age 15, I watched a documentary about European Skinheads and the next day got Doc Martens and decided I would create a revolution by myself in Sudbury Ontario. Not knowing there were others like me I was on my own for a year until I met other Skinheads and then got introduced to organisations and philosophies like the Heritage Front and Church of The Creator. Then I was reborn with a mission to save my country and people. It was then ON! and I took command of the local Skinheads older than I was by 5 years and became their leader.

Toronto in the early 90's was a very interesting time with a large presence of White Racial Loyalists organizations active. Can you share with our readers some of your memories of the different groups active at the time and the WRL leaders you have met

I was involved with WAR (White Aryan Resistance) and then the Heritage Front, that was all I stood for in Canada, then Church Of The Creator my religion of race that had not been put into words or context until I heard and read their doctrine, a calling, others that believed in science and nature summed up perfectly to my beliefs. I thought I was alone in the world but with Creativity and the Heritage Front it was almost like they were created specifically for me and my beliefs, no longer the lone wolf.

I handed out flyers, recruited, got into confrontations to debate and explain my beliefs to the masses of Sheeple. Heritage Front, Church of The Creator, National



Blog Archive

- ▶ 2018 (28)
- ▶ 2018 (92)
- ▼ 2017 (56)
 - ▶ December 2017 (9)
 - ▶ November 2017 (4)
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CREATIVITY



Creativity Toronto

Creativity is a Professional, Non-Violent, Progressive Pro-White Religion. We promote White Civil Rights,

White Self-Determination, and White Liberation via 100% legal activism. We do

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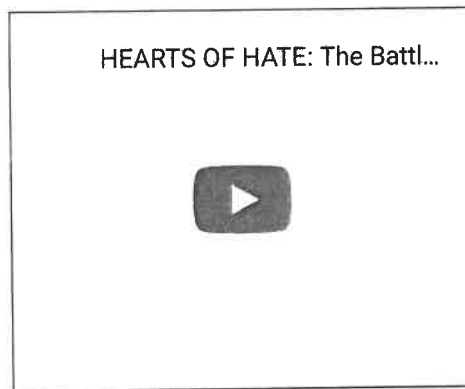
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what are your memories of that night?

Yes, I attended the Rahowa and Aryan concert in Ottawa, May 29 1993 at the Ottawa Boys and Girls Club, that moment rocked the nation, the movement and my life. Was 17, on my way to my first racist rock show, got there, met George Burdi one of the first to greet me, they had a liquor licence so me and my crew bought beer, enjoyed the music, was in the mosh pit, there was a 60 year old couple there which I thought was odd but they were with us, then it all hit the fan.

A few years later I found out we had an informant Stuart Porteus who gave Anti-Racist Action the location of our show. 700 ARA were outside protesting we were not concerned until they climbed the poll and cut our power. Then with the power and show over, which all bands played and only a few of last songs got cut off, but now you got 60 skinheads and white nationalists geared up for war. We did not care that 700 hundred people were out there out to mess with us, 1 of us equals 10 and we proved it that night.

First we told the women and older people to go out the back door, we would face the enemy. They went, we went out the back door and went through an alley out to the street to meet our opposition. Riot squad and police were there to keep us separate so both sidewalks on either side marched up to parliament Hill and along the way I tried to charge across the street myself but was stopped by a police dog on my arm that was the front cover of Le Droit newspaper the next day. We got to the Hill, Wolfgang and Burdi gave a speech and I was front and centre on the steps in front of them.



After the speech on Parliament Hill we then proceeded down the street in front of Chateaux Laurier standing in front of the building standing amongst pillars while ARA was across the street throwing, rocks, bottles, eggs and pieces of cement from construction in the area at us. Wolfgang whom id known a few years was adamant about not retaliating... Well I was 17, impetuous and decided to disobey orders after I saw Wolfgang get hit with cement and said screw it and was first to charge across the street to meet the enemy and everyone followed me, chaos ensued and the 700 ARA vanished into thin air as we mounted a counter attack, they ran so fast we only caught the slow runners and people foolish enough to stand their ground. I became George Burdi's bodyguard after he got pepper sprayed and held on to him since he was blinded and took some police batons to defend him and guided him around until he got his sight back and also at same time stopping our people from getting into it with innocent passers by because we were frustrated most of the enemy had vanished so quickly, later on in years I found out the ARA hid behind a building we didn't see them retreat behind, and were cornered with no escape, they quaked in fear but the surreal brawl on the streets and the police basically stood out of the way

common sense and reality, not myth and fantasy. No other religion can honestly make this claim.

[View my complete profile](#)

Labels

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us.

You have become somewhat ostracized within the White Racial Loyalist community in Canada, when and why do you feel this occurred?

I stayed active for years with HF, COTC, WAR and NA for over a decade, recruiting, travelling from coast to coast part of crews and chapters from New Brunswick to BC and Alberta. The movement quiets down and re surges as the political climate changes in waves up and down. On a political upswing in the movement on the advent of Facebook I once again returned to recruit and enlighten the masses.

One day I decided to go into Sharp (skinheads against racial prejudice) and ARA (anti-racist Action) Facebook pages to shut them down, denounce them, debate and convert some as I have done in the streets in the past.

Then I noticed my arch Nemesis, enemy number 1. Alicia Reckzin, I won't repeat my first words to her but they were not nice. She was the leader and founder of Sharp and ARA in Ottawa that led the attack against us, whom George Burdi kicked in the face in the Ottawa riot. I had waited for years to confront her and verbally rip her apart as I did that day. Next thing I know, private chat started with debate and somehow turned to flirting as a joke then it became real. She came to me on a Greyhound Bus after she ripped her Sharp and ARA patches off and swore I had converted her, I'm quite intelligent and persuasive, I have converted half a dozen ex ARA in the past and they have now been White Nationalists for decades.

I knew my reputation was at stake and what people would think because I thought the same but saw opportunity, For years re-watching Hearts Of Hate the documentary we were on from the Ottawa riot I hated her with every fibre of my being but part of me always thought, "what a waste, she's intelligent and wish we had her on our side and tried to analyse what would turn her in such a direction".

Once I took the plunge with Alicia I saw a big picture of what she could become and mean to the movement, robbing the anti-whites of their queen and her becoming the new spokeswoman of the movement was my vision, risking my own life and reputation for the big picture and the greater good of the movement knowing I would be marked as a traitor by some as I would have.

First I discovered Alicia Reckzin (Reckzin being her stepfather's last name which is Polish and her real fathers last name being Kempster (Scottish) and mother's side Welsh) to clear up her heritage as I met her whole family. She was already part of the white nationalist movement prior to her founding and being at the forefront of 2 anti-racist groups as Sharp and ARA .

She had been hurt and had her heart broken by two skinheads when she was younger and hence being a woman scorned turned against the movement and created a whole movement to destroy us all over a broken heart.

Some of her family quite right wing and even her children admitting to me she has always been right wing but only hated skinheads for being hurt and heartbroken as a young skinhead girl had convinced me to accept her as genuine and risking my life and limb to gain her acceptance in the movement and bring her to meetings my dreams for her came true... For awhile, people turned on me, I understood and accepted that but once they saw the effect of what I did and tried to do I thought they would see I was right to do what I did.

Brother Thomas Seay (1)
C12 (1)
CAFE (4)
Callen Cambuel (3)
Canadian Nationalist Front (2)
CANUND (1)
CFIRC (1)
Children of the Reich (1)
CHRC (7)
Chris Brosky (1)
Christopher Peterson (3)
CI (2)
COINTEL PRO (3)
Craig Cobb (9)
Creative Credo (2)
Creativity Alliance (3)
Creativity Prison Ministries (2)
Creativity Scotland (2)
Curt Beasley (1)
Cynthia Callan (1)
Den White (1)
David Duke (2)
David Weisman(Hale Prosecutor) (1)
Donnie McGiffen(ANSSMC) (1)
Don Andrews (2)
Doug Christie (2)
Downright hateful (1)
Dr. James Sears (4)
Dr. William Pierce (4)
Dylann Roof (1)
Ecclesia Creatoris (3)
EDL (1)
ELYSIUM (1)
Empire Falls (2)
Ending White slavery (6)
Ernst Zunde (2)
Ethnic Cleansing (2)
Evelyn Hutcheson (28)
Expanding Creativity (1)
Faith Goldy (1)
Final War (1)
Free America Rally (1)
Gary Gallo (1)
Gary Yarbrough (4)
George Burdi (3)
George David Loeb Jr (5)
George Lincoln Rockwell (1)
Glenn Miller (3)

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I had divided the movement into two factions for or against Alicia and that's when attacks and interference came from the against faction, specifically one woman who was the darling of the movement at the time was jealous and befriended both of us, moved to Ottawa then proceeded to destroy both of us and then started feeding info and pictures to ARC hence my public image going down hill. Recordings of phone conversations that were just joking around and taken out of context fed to the right, my reputation was tarnished forever because of jealousy, kind of a love triangle drama, public posts of me on Facebook being drunk and foolish and cloned profiles of me making outrageous statements by the same woman, made me look bad.

Before that my reputation was solid but since Alicia some 2 or 3 women I had spurned, refused to date or broke their heart decided it was a good opportunity to get back at me and hurt me by spreading false rumour and outright lies about me then some former brothers that I had bad blood with in the past or I had turned them away not wanting to hang out with them jumped on the bandwagon and started doing the same without so much as to confront me or ask me questions if anything was true or not and they just choose to gossip like a bunch of hens about things they know nothing about and half are not even stories about me but other people just with my name in their story. Of course I got angry and lashed out at everyone publicly, my relationship with Alicia disintegrated due to the fact I could not reconcile the fact I was sleeping with the enemy or former enemy was just too much for both of us and it all blew up in my face. The end of Kevin Goudreau? I may fall but I will always arise again!

The ARC still features you on their site on a regular basis, do you feel this press helps or hurts your efforts?

I licked my wounds, still had lots of support, still recruited, moved back to southern Ontario, connected with over a dozen White Nationalists that knew me and started to rebuild. ARC articles did not stop me, any publicity is good publicity, any actual screenshots that were not of hacked or cloned accounts but from my private posts were to my comrades, not for public consumption, just made me a real person even though just an online persona that is not quite accurate and not some attempt to be a fake politician, shown as kind of like a Rob Ford of the movement, yeah I drink, I make mistakes, I sometimes swear and get emotional and do stupid things like everybody else, I'm not invincible, I'm just an average joe, a joker and well, a political White nationalist revolutionary.

When did you start the Canadian Nationalist Front and what is its doctrine?



I started the White Nationalist Front 10 years ago. My race is my religion and I'm a Creator but religion has no place in the now Canadian Nationalist Front, we have enough divisive issues. We are against third world immigration, for deporting non-

- Harold Covington (3)
- Harold Mansfield (2)
- Helen Hall (1)
- Heritage Front (1)
- IMPERIUM (21)
- Invictus (5)
- James Amend (1)
- James T Moody (2)
- Jason Devins:(ARA) (1)
- JDL (2)
- Jeff Schoep NSM (2)
- Jim Huberty (1)
- Jim Keegstra (2)
- Joan Lefkow (19)
- John Crookston (1)
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- Jon Latvis (1)
- Jon Smetona (1)
- Kai Murros (1)
- Kevin Goudreau (3)
- Kevin MacDonald (1)
- Kill Baby Kill (1)
- KKK (7)
- Kremator (1)
- Kyle McKee (1)
- Larry Edwards (1)
- Leith ND (4)
- Leroy St Germaine (2)
- Liberity Bell Magazine (1)
- Malcom Ross (2)
- Marc Lemire (3)
- Mark Quilts (1)
- Matt Hayhow (4)
- Matt Kuehl (1)
- Max Hynes (7)
- Max Reslet (2)
- Mein Kampf (1)
- Michael Myers (1)
- Michells Irstikaitis (1)
- Midtown Bootboys (1)
- Might is Right Power Hour (1)
- Mike Todd (1)
- Monika Scheeffer (1)
- Morris Dees (SPLC) (1)
- MOSSAD (3)
- MS-13 (1)

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The CNF recently held a rally in Peterborough Ontario, how did it go?

Had a White pride rally in Peterborough on Sunday march 18th downtown Peterborough at the mall Peterborough Square. Small numbers that day because of the anti-blasphemy law M-103 protests in 22 cities across Canada that day. We were having lunch and down the street Muslims were at the corner at the mall approaching people about Islam.

Been told by veterans not to alert the media unless we had 10 to 15 people because it would make us look bad and realised it held me back from rallies I tried to hold in the past. Well we had people there that came up from Toronto and down from northern Ontario and we didn't get dressed up for nothing so we voted to go to the mall beside the Muslims. By the time we showed up with our flags they were across the street and moved out of sight. We waved our flags shouting "White Pride Worldwide!" I didn't alert the media but a couple commies walked by and took pictures. We left, made our stand and didn't think much of it until the next day, it was all over the news and went viral online.



Is there anything else you would like to add?

My online persona isn't really who I am, if you met me or chatted on the phone most people are holy fuck your nothing like your Facebook, of course! its the internet! I project what I want even if its for a laugh. People take the internet too seriously and its not me taking it too seriously, people need to relax, get together, have a pint to see who people really are. My internet persona or posts are not who I necessarily am for real and people need to realize that about us all, in the old days we would have an argument or a fight and the next day shake hands and have pint and all is well again, downside of the internet side of organizing is face to face contact and letting foolish things build up or not get resolved because its not one on one.

I'm not actually arrogant or get involved in divisive issues, believe in all groups working together for the greater good and the big picture, I have made peace and am friends with former opponents, put petty differences aside for the greater good, focus on our common goals and not differing methodology, minor ideological differences or old bad blood or drama, gossip etc, but what

- NSM (3)
- NYS Creativity Ministry (2)
- Odin's Law (1)
- Odinism (5)
- Ol Fest (2)
- Patriotic Front Radio (2)
- Paul Fromm (18)
- People Haters (1)
- Philippe Rushton (1)
- PM Costello (4)
- Podblanc (1)
- Proud Boys (1)
- Racial Loyalty (102)
- Racist America Radio (2)
- RAHOWA (The band) (4)
- Randy Weaver (2)
- Rev A.W. Reynolds (1)
- Rev Charles C. Messick III (2)
- Rev Cook (3)
- Rev Devslez (3)
- Rev Don Johnson (1)
- Rev Jacobs (1)
- Rev James Mac (12)
- Rev John Brooks (1)
- Rev John Victor (2)
- Rev John Westphal (2)
- Rev Kyle Marquardt (7)
- Rev Logsdon (54)
- Rev Matt Hale (125)
- Rev Matt Hale Court Documents (85)
- Rev S.D. Kenly (1)
- Rev Victor Wolf (1)
- Richard Butler (4)
- Richard S. Hoshler (1)
- Rick McCarty (3)
- Robert Matthews (2)
- Robert Smith (1)
- Ron McVan (2)
- Ronald S. Hand (1)
- Rudy Stanko (7)
- Russell F. Walker (1)
- RWR (9)
- Salubrious Living (1)
- Scott Borchelder (1)
- SHARP (1)
- Silent Brotherhood (3)
- Sister Andrea (1)
- Sister Emily (1)

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Kevin Goudreau
Chairman, Canadian Nationalist Front

CANADIAN NATIONALIST FRONT



A Hater Among us...(National Post), Interview with Kevin Goudreau (2011)

- Steve Thomas (1)
- Stormfront (4)
- Susan Yarbrough (2)
- TCM Canada (1)
- TCM Croatia (11)
- TCM Newsletter (9)
- TCM Poland (2)
- TCM Toronto (6)
- TCM UK (1)
- TCM USA (1)
- TCM Women's Division (3)
- Terry Long (1)
- Terry Tremaine (6)
- The Camp of the Saints (1)
- The Little White Book (2)
- The Order (4)
- The Racial Loyalist Manifesto (3)
- The Turner Diaries (2)
- The Voice (1)
- The White Canada Association (1)
- Thomas Durkin (1)
- Thomas J. Anderson (1)
- Tim Wise (2)
- Tom Metzger (10)
- Tony Evola (14)
- Total War (1)
- Travis Golic (3)
- United Klans of America (9)
- Vaginal Jesus (1)
- Valerie Protopapas (1)
- Valhallas Patriots (1)
- Vinland Warriors (1)
- Virgil Griffin (1)
- VNN (1)
- Volkstfront (1)
- W.A.R (2)
- Wade Page (1)
- White Americans Party (5)
- White Aryan Resistance (2)
- White Knuckle Driver (1)
- White Man's Bible (3)
- White News Now (1)
- White Pride Radio (2)
- White Revolution (10)
- White Struggle (5)
- White Terror (Documentary) (1)
- Will Williams (1)
- William A. White (5)

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Posted by Creativity Toronto at 13:49

Labels: Alicia Reckzin, ARA, ARC, ARYAN (The band), Canadian Nationalist Front, Dr. William Pierce, George Burdi, Kevin Goudreau, RAHOWA (The band), SHARP, Tom Metzger, White Aryan Resistance, Wolfgang Droege

2 comments:



Unknown 30 August 2017 at 21:50

Great Speech !

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Jack Black 5 May 2018 at 17:46

Kevin Coudreau certainly has a big mouth and an even bigger ego.

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yea...



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Type:
Description:

Common Interest - Beliefs & Causes
Commissioner of affidavits, etc.
Tactical strategy to destroy left wing terrorist groups, FACEBOOK S.H.A.R.P., ANTI-RACIST ACTION, ANTI-FA and elements dangerous to our people, database of traitors, Zionists and communists. THIS IS A COUNTER OFFENSIVE GROUP FOR ONLINE WARFARE AND SPYING TACTICS AS A REACTION TO OUR ACCOUNTS BEING DELETED AND OUR GROUPS AND FRIENDS LISTS INFESTED BY ANTI-RACIST SCUM FAKE PROFILES THAT SOME OF YOU DON'T REALIZE AND THE ONLINE INFO ON THESE ONLINE ANTIS IS EXPANDING TO THE REAL ONES OFF LINE AS WELL.

SECRET SITE MEANS KEEP IT A SECRET!!!
MEN ONLY UNLESS A UNANIMOUS DECISION TO LET A FEMALE IN*
MEMBERS TO BE APPROVED AND SPONSORED BY A MEMBER TO VOUCH FOR THEM AND THEREFORE YOUR RESPONSIBILITY THEY MUST BE APPROVED BY ADMINS AND A GENERAL CONSENSUS OF MEMBERS BEFORE BEING TOLD OR INVITED TO THE GROUP THIS GROUP MUST REMAIN SECRET AT ALL COSTS

EVEN THOUGH SECRET ITS STILL UNDER THE WATCHFUL EYE OF ZOG BUT WE ARE UNDER THE RADAR BUT ACT ACCORDINGLY AS IF WE ARE BEING WATCHED 24/7

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- #2 NO TALK OF KILLING PEOPLE.
- #3 DONT GIVE TOO MUCH PERSONAL INFO ABOUT YOURSELF TO THE GROUP
- #4 ALL INFO COLLECTED HERE MUST HAVE SUPPORTING PROOF OR CONFORMATION.
- #5 IF YOU HAVE BEEN DELETED BY FB YOU MUST MESSAGE A PASSWORD TO CONFIRM YOU ARE WHO YOU SAY YOU ARE.

VIOLENCE IS NOT TO BE TALKED ABOUT THAT IS NOT WHAT THIS SECRET SITE IS ABOUT, ITS ABOUT COLLECTING INFO, NAMES AND PICS, WE WILL USE THEIR STRATEGY OF MAKING FAKE PROFILES AND SITTING IN THEIR GROUPS, WE ARE ONLY INTERESTED IN THE ONES WHO ARE VIOLENT OR PROMOTE VIOLENCE AND ACTIVELY ACT AGAINST US AND DISRUPT US THE ONES THAT STAY IN THEIR GROUPS AND DON'T BOTHER US WE WONT PAY ANY ATTENTION TOO THOSE WHO MAKE MAKE PROFILES WILL LET THE PROFILE SIT IN ALL THE ANTI-GROUPS AND WATCH AND LISTEN AND TAKE NAMES AND PICS AND ALSO START REPORTING THEM TO FACEBOOK LIKE THEY DO TO US TO DELETED THEIR PROFILES AND GROUPS WERE FIGHTING FIRE WITH FIRE AND AS YOUR FAKE PROFILE MATURES AFTER TIME WITH A LOT OF ANTIS ON YOUR FAKE FRIEND LIST THEN START TO TALK TO THEM AND GAIN THEIR CONFIDENCE THEN WE WILL CREATE MISTRUST AND INFIGHTING IN THEIR RANKS AND THIS GROUP IS A GENERAL DEPOSITORY FOR INFO ON GROUPS AND PEOPLE OFF FACEBOOK *NO TALK OF VIOLENCE* JUST SELF DEFENSE AND ORGANIZING AGAINST THEIR ATTACKS AND TACTICS

Contact Info

Office: south of heaven
Location: crimson
Valhalla, AL

Recent News

They are fact!

Members

Displaying 8 of 21 members

See All

Barry Bennett
Kevin Goudreau
Nick Schneider
Tyler AryanGuard
Sion Lynford Owens
Bull Hayward

Discussion Board

Displaying 3 of 5 discussion topics

Start New Topic | See All

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Edit Members

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Create Related Event

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Group Type

This is a secret group. It will not show up in your profile, and only admins can invite members.

Admins

- Kevin Goudreau (creator)
- Jesse Tidd (John Mccrae Secondary School)
- Kyle McKee
- Mike G. (Toronto, ON)
- Bull Hayward
- Barrington Christopher Ellis (Toronto, ON)
- Andy Combo Cameron (London)

Events

There are no events.

Create Events.

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- White Pride Movement Common Interest - Beliefs & Causes
- Richard Warman Watch Common Interest - Beliefs & Causes
- 500,000 people who think peadophiles should be burnt alive. Organizations - Professional Organizations
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what is the date of this?



UPDATED ANTI-RACIST LIST

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Topic: UPDATED ANTI-RACIST LIST

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Displaying all 2 posts by 2 people.

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Kevin Goudreau wrote

on November 5, 2008 at 11:29am

Post #1

- *Inder Pal (Vancouver) Indian ADVOCATE OF THE RAPE OF WHITE WOMEN
- * Sean Lewis (Toronto, ON) DANGEROUS ANTI-RACIST ARA LEADER OF TORONTO AND SHARP AND ADMIN & Paul Von Kleist FAKE PROFILE
- *Chris Olsen (Ottawa) SHARP AND WOMAN BEATER
- *Justin Newman (UF) JEW ANTI
- *Rachel Tidsw (New York, NY) NIGGRESS / LESBIAN ARA ADMIN
- * Rachel Sdit (New York, NY) NIGGRESS/LESBIAN ARA ADMIN
- * Liam Waite (St. Catharines / Niagara, ON) SHARP
- * Henrik Forsblom (Finland) RASH AND SHARP ADMIN
- * George Elser JEW
- * Ant Watson ANTI-FAKE PROFILE
- * Yusur Al-Bahrani (American University of Sharjah) IRAQI ANTI-RACIST
- * Rob Jones (London) ANTI-RACIST
- * Quinn Scorpio (Winnipeg, MB) ANTI-RACIST
- * Quinn Lawless (Terry Fox Senior Secondary) ANTI-RACIST
- * Jamie Hackworth (Edmonton, AB) SHARP Stacy Killbourne FAKE PROFILE
- * Søren Enevoldsen (Denmark) ANTI-RACIST
- * Race Traitor ANTI-FAKE PROFILE
- * Antti Wehter (Finland) ANTI-FAKE PROFILE
- * David Murphy (Sheffield) ANTI-RACIST
- * Richard Stockwell
- * Zach Marvain (Wilmington DE) SHARP
- * Phil Horvath SHARP
- * Greg Kealey ANTI-RACIST COMMUNIST
- *Francesco Chioocchio (France) ARA
- * Lauren Hughes (Boston, MA) SHARP ADMIN
- * Brian Smith (Boston, MA) SHARP ADMIN
- * Edmond Arthur FEMALE ANTI-RACIST
- * Mary Ann (Sheffield) FAKE PROFILE
- *Micheal Edwards TRAITOR TRYING TO JOIN SHARP
- *Shoe Shine BRITISH SHARP
- *Dave Taylor (Leeds) ANTI-RACIST
- *Sarah Ferris (Australia) Anti-racist
- *Sasha Moola (KwaZulu-Natal)
- *Andy Ryan (Cardiff)
- *Charles Tickler (London)

Reply to Kevin
Mark as Irrelevant
Report
Delete Post



Rate your star Merchant and grab your chance to win a 5-Star weekend or one of 50 gift cards of 100\$.

ClearlyContacts.ca



a more affordable,
easier
and faster

SHOP NOW



Tyler AryanGuard wrote

21 hours ago

Post #2

- *Cody Williams (Calgary, AB) SHARP
- *Mark Courtney (Edmonton,AB) SHARP

Reply to Tyler
Mark as Irrelevant
Report
Delete Post

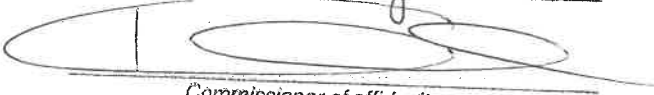
Reply

Text input area for replying to the post.

Post reply

More Ads

D

SWORN in the City of OTTAWA
this 28 day of May, 2019

Commissioner of affidavits, etc.

Subject: uttering racist/homophobic threats - Kevin GOUDREAU

From: Richard Warman

To: oshawa@drps.ca; richards@drps.ca;

Cc:

Date: Wednesday, May 23, 2012 12:22 PM

Dear Inspector Ostler and Const. Richards:

I am a lawyer who has done work in the area of monitoring the neo-Nazi movement in Canada.

It is my understanding that an individual named Kevin GOUDREAU lives within your jurisdiction in Oshawa. Mr. GOUDREAU has a long history of involvement with the neo-Nazi movement and has a tattoo of a swastika and smoking shotgun barrels on his chest. I write to bring to your attention material that Mr. GOUDREAU has been publishing on his Twitter account including the following post (screenshot attached) of 21 May 2012, where he announces he is going on a "race traitor and mud killing spree":

<https://twitter.com/#!/KevinGoudreau/statuses/204588268610797568>

'Race traitors' refers to whites who intermix with non-whites and the term 'mud' is used by neo-Nazis to refer to non-whites. Mr. GOUDREAU's other tweet messages make frequent use of racist slurs such as 'nigger'.

I've also attached another screenshot where he talks about euthanizing the disabled. Similarly, in a post on 22 February 2012, Mr. GOUDREAU states "In the pub surrounded by retards that cant sing. no niggers so I may beat a table full of fags and dykes lookin at me." Given the recent events in Norway with Anders Breivik, I thought it important to make you aware of this material.

I would ask that you accept this as a formal criminal complaint with regard to s. 264.1 (uttering threats) of the Criminal Code and any other offences that may have been committed.

If you have any questions, please do not hesitate to contact me.

Regards,

Richard Warman
Barrister and Solicitor
Ottawa

cc: African Canadian Legal Clinic
EGALE
B'nai Brith League for Human Rights
Friends of Simon Wiesenthal Centre
Centre for Jewish and Israel Affairs

Attachments

- GOUDREAU tweet - 21 May 2012.jpg (760.59KB)
- GOUDREAU tweet - 6 Apr 2012.jpg (793.33KB)

The screenshot shows a mobile browser displaying a Twitter post. At the top, the browser's address bar shows the URL <https://twitter.com/KevinGoudreau>. Below the browser, the Twitter app interface is visible, including a search bar and a navigation bar with icons for home, search, messages, profile, and settings. The main content is a tweet from **Iwana WAW Argentina** (@IwanaWAW) posted on May 21. The tweet text reads: "@ivanawau Going on a race traitor and mud killing spree then coming to hide out at your place in Argentina, still a non-extradition treaty?". The tweet includes a profile picture, a "Follow" button, and interaction options for Reply, Retweet, and Favorite. Below the tweet, there is a login prompt: "Don't miss any updates from Kevin Goudreau" with fields for "Full name", "Email", and "Password". The background of the page features a large image of a person with extensive tattoos, including a prominent one on the chest.

Kevin Goudreau (@KevinGoudreau) 6 Apr
In peacetime man wars with himself. Netzsche

Kevin Goudreau (@KevinGoudreau) 6 Apr
In Canada non-white immigrants get free daycare, car lease, grants! In the words of Trooper Raise A Little Hell!

Kevin Goudreau (@KevinGoudreau) 6 Apr
They are letting a he/she defile the sanctity of Miss Univerself we let this happen your fags! Take a stand! Save our land! From muds/mutants!

Kevin Goudreau (@KevinGoudreau) 6 Apr
Perhaps iv been shall we say crass but in nature deformed and defective offspring are they not eaten and or killed? Look to mother nature.

Kevin Goudreau (@KevinGoudreau) 6 Apr
Euthenize the defective mutants, puny our gene pool!

Kevin Goudreau (@KevinGoudreau) 6 Apr
Am thus inspired by Metallica The Four Horsemen!

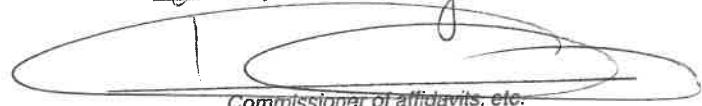
Kevin Goudreau (@KevinGoudreau) 6 Apr
Peace+love+white power= :)

Browser address bar: <https://twitter.com/#!/KevinGoudreau>


Taskbar: Suggested Sites, Amazon.ca - Online Shop..., HP Games - Top Games, Get more Add-ons

E

This is Exhibit "E" to the Affidavit of Richard
Wauman sworn in the City of Ottawa
this 28 day of May, 2019


Commissioner of affidavits, etc.



Kevin Wnf Goudreau
15 hours ago via mobile 

Probably been deleted about 70 times now

Like · Comment



StaySea Schmidt I was going to ask if you got deleted again.
8 hours ago · Like




Paul Fredericks Some American should look into a class action
suit against Facebook for their censorship of the people who put
money in their pocket. We the users allow them to charge advertizers
big bucks. Yet, they treat us like shit!
7 hours ago · Like



Kevin Wnf Goudreau Now that they are publicly traded and their
stocks are really low we should all start buying shares to gain some
voting control
7 hours ago via mobile · Like



Paul Fredericks That's an idea. the stocks have really slumped
since their over-priced initial offering. I think they are traded on
the NASDAQ. I'll try to find out.
7 hours ago · Like ·  1



Kevin Wnf Goudreau And if we get enough people behind us
and voting shares we can fire ZuckerBerg haha
7 hours ago via mobile · Like



Kevin Wnf Goudreau

15 minutes ago via mobile

Blocked for 30 days you f***** dirty kike ZucketBerg I will cut
your jew nose off and shove it up your ass

Like · Comment

2 people like this.



Gary Firth Why did they block you or do you know .

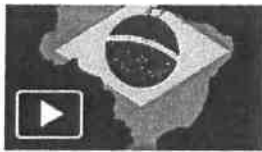
13 minutes ago · Like



Kevin Wnf Goudreau

about an hour ago

When I'm on the run from killing Jews I'm coming to you with
flowers and I'm going to sing this



Skulls Skins Of Brazil

Skulls

Like Comment

https://www.facebook.com/profile.php?id=100004461613759

facebook

Search for people, places and things

Kevin Wnf Goudreau · Timeline · Now

Like · Comment

Kevin Wnf Goudreau

15 minutes ago via mobile

10,000 dollars to the Jews that Gives me Mark Zuckerberg's address

Like · Comment

Kevin Wnf Goudreau

24 minutes ago

To Zuckerberg every leftist f***** kike your dead for f***** with us

Aggravated Assault - Sieg Heil

Audio

Like · Comment

Holly Caust likes this.

Thinghaus

Italia Fascista

Kevin Wnf Goudreau

20 minutes ago

10,000 dollars to the Jew the gives me Mark Zuckerberg's address

Platoon 14 - We've Come For War

Audio track

Like · Comment

Kevin Wnf Goudreau

32 minutes ago

Grab a nigger and curb stop it today

American History X - White man marches

OR

Per il Frank

https://www.facebook.com/profile.php?id=100004461613759

facebook

Search for people, places and things

Kevin Wnf Goudreau · Timeline · Now

Kevin Wnf Goudreau
9 minutes ago

To Abbee Corb You're on our hit list b*****



Platoon 14 - We've Come For War
Audio track

Like · Comment

Kevin Wnf Goudreau
15 minutes ago via mobile

10,000 dollars to the Jews that Gives me Mark Zuckerberg's address

Like · Comment

Kevin Wnf Goudreau
25 minutes ago



Likes
2 Likes

See All



Thinghaus
Italia Fascista

Kevin Wnf Goudreau
20 minutes ago

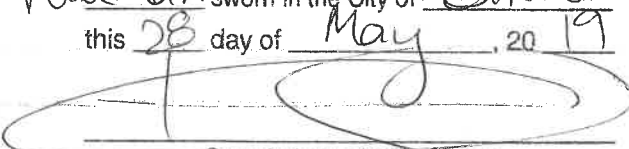
10,000 dollars to the Jew the gives me Mark Zuckerberg's address



Platoon 14 - We've Come For War
Audio track

F

Subject: death threats from Oshawa neo-Nazi Kevin GOUDREAU
From: Richard Warman
To: mhindmarch@drps.ca;
Cc:
Date: Sunday, October 14, 2012 12:13 PM

This is Exhibit F to the Affidavit of Richard Warman sworn in the City of Ottawa this 28 day of May, 2012

Commissioner of affidavits, etc.

Dear Det-Const Hindmarch:

As you know, since May of 2012 I have been bringing to the attention of the Durham Regional Police concerns about threats of violence issued by neo-Nazi Kevin GOUDREAU of Oshawa (<http://news.nationalpost.com/2011/08/06/a-hater-among-us/>) through his twitter/facebook accounts (copy of original complaint email below). I understand that up to now, it has not been felt that Mr. Goudreau's threats have crossed the criminal line for uttering threats or other criminal offences.

Kevin GOUDREAU is now threatening to kill further individuals/groups including Facebook's Mark Zuckerberg and Dr. Abbee Corb who works with various Ontario police forces as part of the Hate-Crime and Extremism Investigative Team (hceit.ca) regarding extremist activity (Facebook screenshots attached).

Mr. Goudreau now states the following in his latest online posts:

- 1) that he will be "on the run from killing Jews"
 - 2) that as a result of being kicked off Facebook again, he threatens Mark Zuckerberg calling him a "dirty kike" and then saying "I will cut your jew nose off and shove it up your ass"
 - 3) that he will give \$10,000 to anyone who provides him with Zuckerberg's address
 - 4) that Zuckerberg and "every leftist f***** kike" are "dead for f***** with us"
 - 5) that people should "grab a nigger and curb stop it today" [sic - note, curb stomping refers to the scene from movie American History X where a black male is forced to place his open mouth against a street curb and then has his teeth smashed in from being kicked in the back of the head]
 - 6) threatens Dr. Abbee Corb stating "To Abbee Corb You're on our hit list b*****" accompanied by a link to the Youtube video for neo-Nazi band Platoon 14's song "We've come for war" (lyrics below)
- further, in a 3 Oct twitter post Goudreau states that Dr. Corb is on his 'watch list':

<https://twitter.com/KevinGoudreau/status/253672467963473920>

Kevin Goudreau WNF @KevinGoudreau

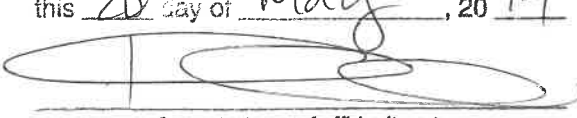
Abbee Corb a Mossad agent living in Canada educated in Israel and US here to infiltrate and subvert our universities and police. On Watchlist

I am submitting this information to you in addition to the previous material as a complaint that Mr. GOUDREAU has violated the uttering threats and willful promotion of hatred provisions of the Criminal Code.

Sincerely,

Richard Warman
Barrister and Solicitor
Ottawa
www.richardwarman.ca

G

Warman sworn in the City of Ottawa
this 28 day of May, 2019

Commissioner of affidavits, etc.

Affidavit of Richard Warman

1. In May of 2012, I became aware of material posted by Kevin Goudreau to his Twitter account announcing that he was going on a “race traitor and mud killing spree” and that further threatened violence against a group of gays and lesbians Goudreau indicated were sitting in a bar he was in. Based on my concerns about these threats, on 23 May 2012, I forwarded an email with the relevant screenshots to the Durham Region Police. Attached as Exhibit A is a copy of that email. The contact emails for the individual representatives of the community groups cc’d on the message have been blacked out to protect their security.

2. On 21 August 2012, I forwarded two emails containing case law and media editorial opinion information lending support to my concern that Mr. Goudreau be charged criminally for his threats to Det Const Hindmarch. Attached as Exhibits B and C are copies of these emails. The contact emails for the individuals cc’d on the message have been blacked out to protect their security.

3. On 21 September 2012, I forwarded to Det Const Hindmarch a copy of a policy statement by the Director of Public Prosecutions in the UK with regard to criminal prosecutions related to social media offences. Attached as Exhibit D is a copy of this email.

4. On 14 October 2012, I became aware that Mr. Goudreau was now publishing death threats through his twitter and facebook accounts directed against Jews, blacks, and individuals Abbee Corb and Mark Zuckerberg. I forwarded my concerns about this to Det Const Hindmarch. Attached as Exhibit E is a copy of my email and attachments. The email addresses of the individuals this email was cc’d to have been blacked out to protect their security.

5. On 22 October 2012, I became aware of further threats of violence posted by Kevin Goudreau to his twitter account and sent an email to Det Const Hindmarch concerning this. Attached as Exhibit F is a copy of my email and attachments. The email address of the individual the email was cc’d to has been blacked out to protect their security.

6. On 14 November 2012, I forwarded further threats posted by Mr. Goudreau to his twitter account to Det Const Hindmarch. Attached as Exhibit G is a copy of this email. The email address of the individual the email was cc’d to has been blacked out to protect their security.


AFFIRMED BEFORE ME)
at the City of Ottawa,)
in the Province of Ontario,)
this 16th day of November, 2012.)
)

RICHARD WARMAN

A Commissioner for taking Affidavits, etc.

H

Print Warman sworn in the City of Ottawa
this 28 day of May, 20 19



Commissioner of affidavits, etc.

Subject: criminal complaint re: Kevin GOUDREAU
From: Richard Warman (richardwarman@yahoo.ca)
To: mhindmarch@drps.ca;
Cc: kiran.bisla@torontopolice.on.ca; scott.purches@torontopolice.on.ca;
Date: Monday, August 13, 2018 8:01 AM

Dear DC Hindmarch:

I write to file a formal criminal complaint that neo-Nazi Kevin GOUDREAU has again committed the offence of uttering threats and the wilful promotion of hatred contrary to ss. 264.1(1) and 319(2) of the Criminal Code.

GOUDREAU's threats are against Toronto resident Marvin (Meir) WEINSTEIN, the head of the Jewish Defence League.

In his social media postings, GOUDREAU threatens that he "will carve a swastika in Weinstein's face. I will crush your throat with my jackboot you slimy your dirty slimy Jew" and "Weinstein your getting punched out you dirty kike and anti Canada peice of shit" [sic]

With further regard to the wilful promotion of hatred, GOUDREAU also states

"You kike loving nigger loving pieces of communist shit, JDL equals using and abusing gentiles and Palestinians to their own self interest. Weinstein loves Jews and Israel more than Canada, he likes to manipulate and use patriotic groups for his poor me Jewish agenda. Anyone supporting them is a goof and fake patriot, being used by people wanting to enslave gentiles aka Goy or Goyim (cattle) Jews are as bad as Muslim filth."

As you know, I have complained numerous times over the years about GOUDREAU's issuance of threats of violence for which he has yet to be held criminally responsible. I urge you and the Crown in the strongest possible terms to ensure that this is no longer the case.

Sincerely,

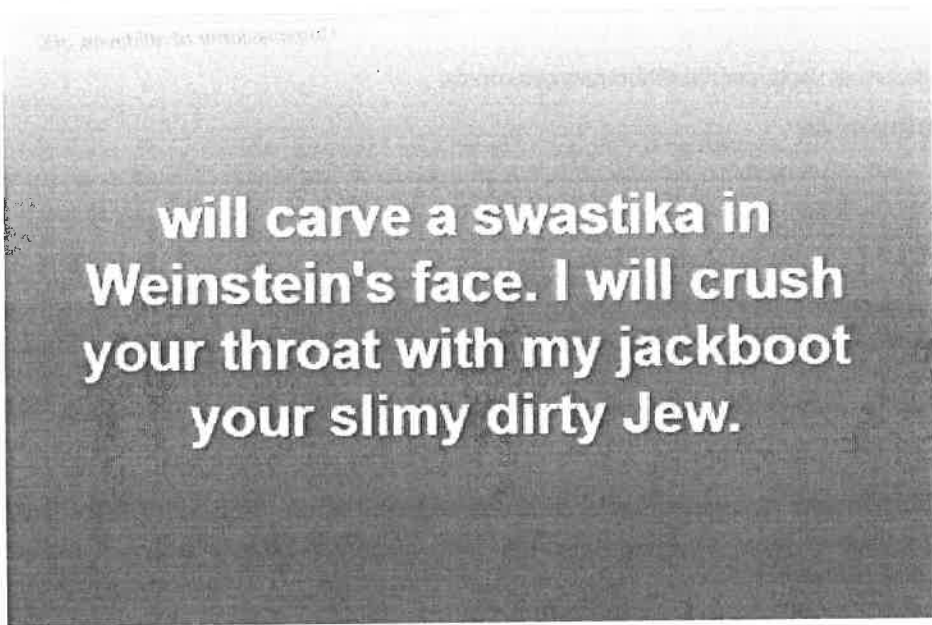
Richard Warman
Barrister and Solicitor
Ottawa

<http://anti-racistcanada.blogspot.com/2018/08/cancelled-wcai-toronto-rally.html>



Canadian Nationalist Front

44 mins ·



1

Like

Comment

Share





Kevin Goudreau

48 mins · 👤



**Weinstein your getting
punched out you dirty kike and
anti Canada peice of shit.**



Like

Comment



Canadian Nationalist Front

37 mins · 🌐



**Fat commie bitch at
Lansdowne place your getting
your fat ugly ass kicked. And
you'll be fired.**

Like

Comment

Share



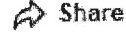


Canadian Nationalist Front

1 hr · 🌐



You kike loving nigger loving pieces of communist shit, JDL equals using and abusing gentiles and Palestinians for their own self interest, Weinstein loves Jews and Isreal more than Canada, he likes to manipulate and use patriotic groups for his poor me Jewish agenda. Anyone supporting them is a goof and fake patriot, being used by people wanting to enslave gentiles aka Goy or Goyim (cattle) Jews are as bad as Muslim filth.



<http://laws-lois.justice.gc.ca/eng/acts/C-46/section-264.1.html>

Uttering threats

264.1 (1) Every one commits an offence who, in any manner, knowingly utters, conveys or causes any person to receive a threat

- (a) to cause death or bodily harm to any person;
- (b) to burn, destroy or damage real or personal property; or
- (c) to kill, poison or injure an animal or bird that is the property of any person.

Hate Propaganda

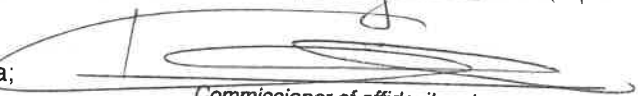
Wilful promotion of hatred

(2) Every one who, by communicating statements, other than in private conversation, wilfully promotes hatred against any identifiable group is guilty of

- (a) an indictable offence and is liable to imprisonment for a term not exceeding two years; or
- (b) an offence punishable on summary conviction.

I

Subject: neo-Nazi Kevin Goudreau counselling murder
From: Richard Warman (richardwarman@yahoo.ca)
To: ckenny@peterborough.ca;
Cc: dtherrien@peterborough.ca; sgilbert@peterborough.ca;
Date: Monday, March 18, 2019 11:02 PM

Print
This is Exhibit I to the Affidavit of Richard Warman sworn in the City of Ottawa this 28 day of May, 2019

Commissioner of affidavits, etc.

Cst Kenny:

As you know, Kevin GOUDREAU is a neo-Nazi with swastika and shotgun barrel chest tattoos who has for years uttered threats of hate-motivated violence online against his perceived enemies. For reasons that I am unable to comprehend as a lawyer, he has gotten away with it up to now. In the wake of the massacre in New Zealand, he has again uttered threats and counselled the murder of his enemies on his personal and Canadian Nationalist Front Facebook profiles including specifically naming the Canadian Anti-Hate Network (I am a Board Member) as a "priority target" (excerpts below and screenshots attached):

<https://www.facebook.com/kevin.goudreau.12>

Hypothetically if your going to do Lone Wolf actions, do it right, priority targets include Antifa, Canadian Anti Hate Network, ARC, any government organization like the Human Rights Commission elements in CSIS aiding them, any organization that has the words Anti-racist in it that actually means Anti-White, hate crimes units, immigration lawyers, Communist propaganda apparatus like CBC, Vice, National Post etc are all valid high value targets marked for future arrest, charges and execution for crimes against the white race and treason, any politicians that supports them, groups like Communists that fund them. Remember always double tap both hemispheres of the brain because some people survive a bullet to the head, bombing is combersom and clumsy, to much potential for collateral damage of innocent people getting hit by shrapnel etc. Women are often worst than the men besides being fat mouty NDP types but no children!



Kevin Goudreau

3 hrs · 🗣️

Ladies and gentlemen we are at war! We are in a state of RaHoWa! Racial Holy War! First priority targets are Cultural Marxists, choose your targets like surgical strikes and minimize collateral damage. It's on! We will put things right! Once and for all time! If your considering direct actions do it right, get the actual enemies of our race and country. Don't waste your talents and freedom on pawns. If you to go that route write the names of political targets on every bullet so none are wasted on innocent people.

Please accept this as a formal complaint that Kevin GOUDREAU has committed one or more of the following criminal offences (contents of each section are listed below):

- i. uttering threats (s. 264.1(1));
- ii. criminal harassment (s. 264(1));
- iii. intimidation (s. 423(1)); and,
- iv. counselling an offence not committed - murder (ss. 464 and 229 respectively).

The Canadian Anti-Hate Network is led by a three-member board of directors and an executive director. I have communicated with my fellow board members (Bernie Farber and Amira Elghawaby as well as our executive director Evan Balgord) and confirmed that Goudreau's threats have caused all of us to be fearful for our personal

safety - either directly from Goudreau or from some other neo-Nazi who may take action as a result of his call for violence against us.

Kevin Goudreau continues to indicate in his social media profiles that he lives in Peterborough and is now claiming he is organizing a demonstration there this weekend. You have indicated in the past that there is some question as to where it is that Goudreau actually lives so if he is not currently in Peterborough, any assistance you can provide in forwarding this complaint to the appropriate police service would be greatly appreciated.

I look forward to hearing from you as soon as possible.

Sincerely,

Richard Warman
Barrister and Solicitor
Board Member - Canadian Anti-Hate Network

cc: Diane Therrien, Mayor
Scott Gilbert, Chief of Police

<http://laws-lois.justice.gc.ca/eng/acts/C-46/section-264.1.html>

Uttering threats

264.1 (1) Every one commits an offence who, in any manner, knowingly utters, conveys or causes any person to receive a threat

- (a) to cause death or bodily harm to any person;
- (b) to burn, destroy or damage real or personal property; or
- (c) to kill, poison or injure an animal or bird that is the property of any person.

<https://laws-lois.justice.gc.ca/eng/acts/c-46/section-264.html>

Criminal harassment

264 (1) No person shall, without lawful authority and knowing that another person is harassed or recklessly as to whether the other person is harassed, engage in conduct referred to in subsection (2) that causes that other person reasonably, in all the circumstances, to fear for their safety or the safety of anyone known to them.

Prohibited conduct

(2) The conduct mentioned in subsection (1) consists of

- (a) repeatedly following from place to place the other person or anyone known to them;
- (b) repeatedly communicating with, either directly or indirectly, the other person or anyone known to them;
- (c) besetting or watching the dwelling-house, or place where the other person, or anyone known to them, resides, works, carries on business or happens to be; or
- (d) engaging in threatening conduct directed at the other person or any member of their family.

<https://laws-lois.justice.gc.ca/eng/acts/c-46/section-423.html>

Intimidation

423 (1) Every one is guilty of an indictable offence and liable to imprisonment for a term of not more than five years or is guilty of an offence punishable on summary conviction who, wrongfully and without lawful authority,

for the purpose of compelling another person to abstain from doing anything that he or she has a lawful right to do, or to do anything that he or she has a lawful right to abstain from doing,

(a) uses violence or threats of violence to that person or his or her spouse or common-law partner or children, or injures his or her property;

(b) intimidates or attempts to intimidate that person or a relative of that person by threats that, in Canada or elsewhere, violence or other injury will be done to or punishment inflicted on him or her or a relative of his or hers, or that the property of any of them will be damaged;

<https://laws-lois.justice.gc.ca/eng/acts/C-46/section-464.html>

Counselling offence that is not committed

464 Except where otherwise expressly provided by law, the following provisions apply in respect of persons who counsel other persons to commit offences, namely,

(a) every one who counsels another person to commit an indictable offence is, if the offence is not committed, guilty of an indictable offence and liable to the same punishment to which a person who attempts to commit that offence is liable; and

<https://laws-lois.justice.gc.ca/eng/acts/C-46/section-229.html>

Murder

229 Culpable homicide is murder

(a) where the person who causes the death of a human being

(i) means to cause his death, or

(ii) means to cause him bodily harm that he knows is likely to cause his death, and is reckless whether death ensues or not;

Below is a copy of a previous criminal complaint filed regarding Goudreau's threats of violence

From: Richard Warman <richardwarman@yahoo.ca>
To: "ckenny@peterborough.ca" <ckenny@peterborough.ca>
Sent: Monday, August 13, 2018 3:13 PM
Subject: Fw: criminal complaint re: Kevin GOUDREAU

Cst Kenny,

As discussed, please find below the email complaint that I sent this morning to Durham Region Police (cc'd to the Toronto Police hate crimes unit).

I appreciate your assistance in attempting to get this information to the appropriate police service for where GOUDREAU is located.

As I mentioned, please don't hesitate to contact me if there's any question.

Regards,

Richard Warman

----- Forwarded Message -----

From: Richard Warman <richardwarman@yahoo.ca>
To: Mark HINDMARCH <mhindmarch@drps.ca>
Cc: Kiran Bisla <kiran.bisla@torontopolice.on.ca>; Scott Purches <scott.purches@torontopolice.on.ca>
Sent: Monday, August 13, 2018 8:01 AM
Subject: criminal complaint re: Kevin GOUDREAU

Dear DC Hindmarch:

I write to file a formal criminal complaint that neo-Nazi Kevin GOUDREAU has again committed the offence of uttering threats and the wilful promotion of hatred contrary to ss. 264.1(1) and 319(2) of the Criminal Code.

GOUDREAU's threats are against Toronto resident Marvin (Meir) WEINSTEIN, the head of the Jewish Defence League.

In his social media postings, GOUDREAU threatens that he "will carve a swastika in Weinstein's face. I will crush your throat with my jackboot you slimy your dirty slimy Jew" and "Weinstein your getting punched out you dirty kike and anti Canada peice of shit" [sic]

With further regard to the wilful promotion of hatred, GOUDREAU also states

"You kike loving nigger loving pieces of communist shit, JDL equals using and abusing gentiles and Palestinians to their own self interest. Weinstein loves Jews and Israel more than Canada, he likes to manipulate and use patriotic groups for his poor me Jewish agenda. Anyone supporting them is a goof and fake patriot, being used by people wanting to enslave gentiles aka Goy or Goyim (cattle) Jews are as bad as Muslim filth."

As you know, I have complained numerous times over the years about GOUDREAU's issuance of threats of violence for which he has yet to be held criminally responsible. I urge you and the Crown in the strongest possible terms to ensure that this is no longer the case.

Sincerely,

Richard Warman
Barrister and Solicitor
Ottawa

<http://anti-racistcanada.blogspot.com/2018/08/cancelled-wcai-toronto-rally.html>

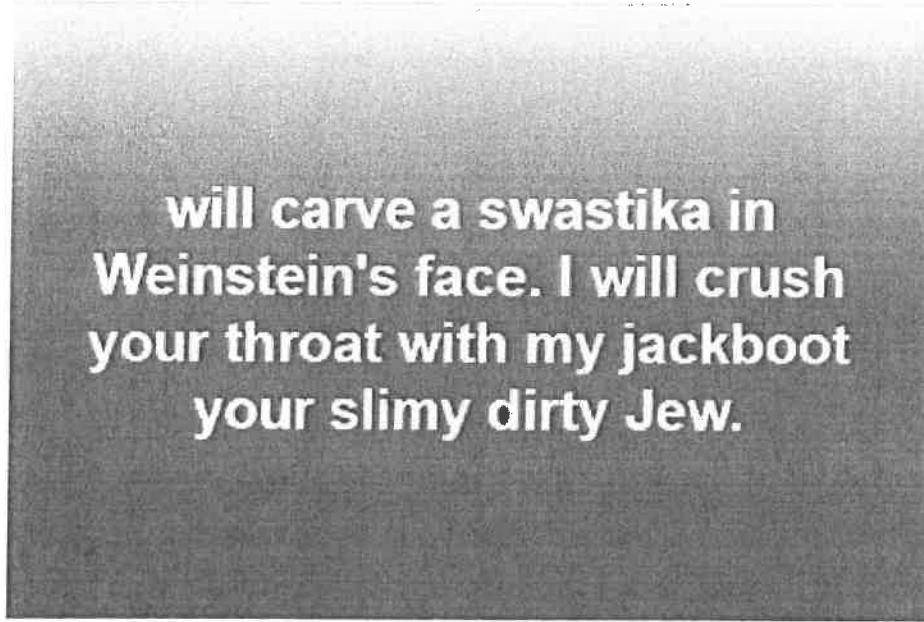
Print



Canadian Nationalist Front

44 mins ·

...



1

Like

Comment

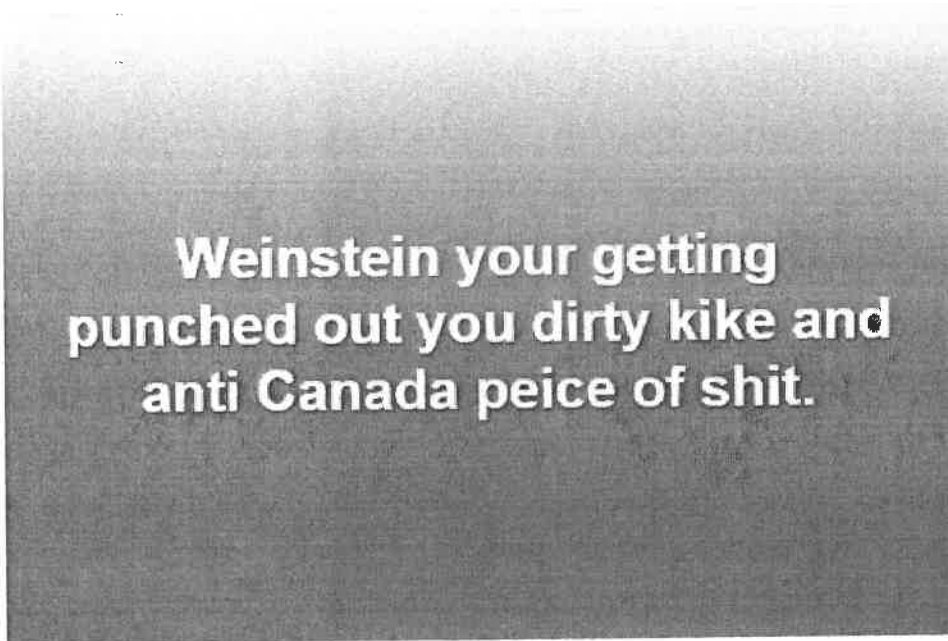
Share





Kevin Goudreau

48 mins · 👥



🔒 4

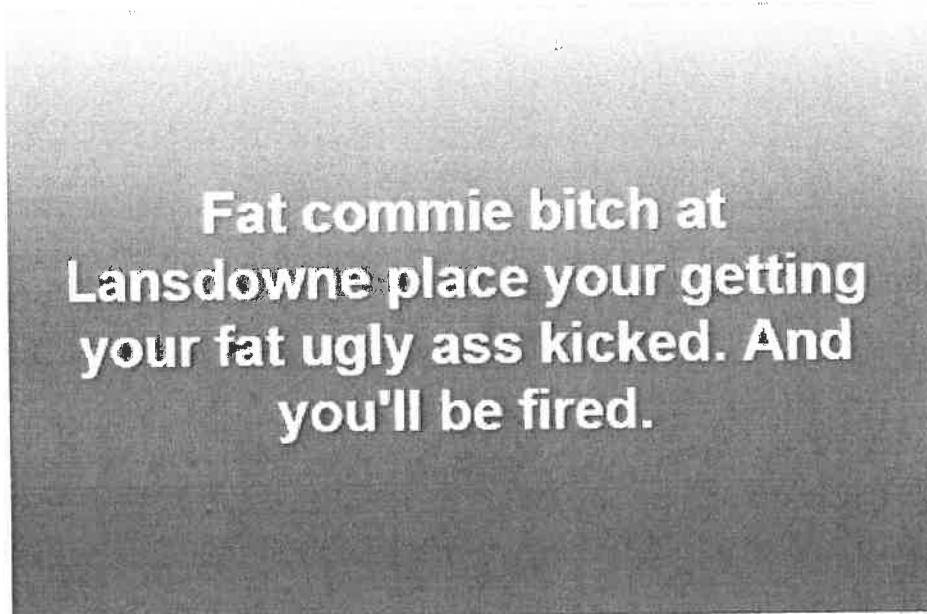
👍 Like

💬 Comment



Canadian Nationalist Front

37 mins · 🌐



👍 Like

💬 Comment

➦ Share





Canadian Nationalist Front

1 hr ·



You kike loving nigger loving pieces of communist shit, JDL equals using and abusing gentiles and Palestinians for their own self interest, Weinstein loves Jews and Isreal more than Canada, he likes to manipulate and use patriotic groups for his poor me Jewish agenda. Anyone supporting them is a goof and fake patriot, being used by people wanting to enslave gentiles aka Goy or Goyim (cattle) Jews are as bad as Muslim filth.



Like



Comment



Share



Attachments

- image.png (24.43KB)
- 20190318 Kevin Goudreau threatens Canadian Anti-Hate Network others 2019-03-18 3 (1).pdf (86.08KB)
- 20190318 FB Kevin Goudreau.pdf (1.07MB)

Kevin Goudreau Timeline 2019 March

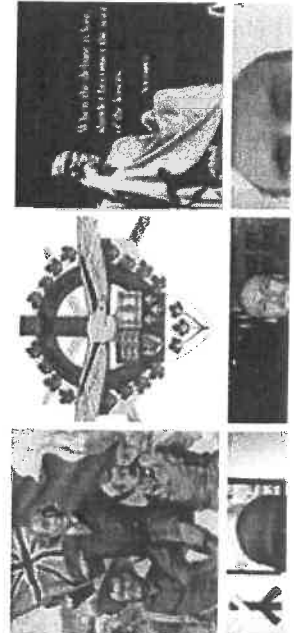
National Chairman, Canadian Nationalist Front.
"Our Heritage! Our Homeland!"

- Lives in Peterborough, Ontario
- From Sudbury, Ontario
- Engaged



wnf-canada.weebly.com

Photos



Kevin Goudreau
3 hrs

Ladies and gentlemen we are at war! We are in a state of RaHoWa! Racial Holy War! First priority targets are Cultural Marxists, choose your targets like surgical strikes and minimize collateral damage. It's on! We will put things right! Once and for all time! If your considering direct actions do it right, get the actual enemies of our race and country. Don't waste your talents and freedom on pawns. If you to go that route write the names of political targets on every bullet so none are wasted on innocent people.

and 5 others
3 Comments

Like Comment

Dane Adam Its the "innocent people" part at the end I don't like. No such thing. In a war environment they don't follow the Geneva convention. Plant IED s and run... These people are not innocent.. Quite the opposite. I hear what you are saying

Kevin Goudreau I know you get it and why I'm obligated to say certain things for legal reasons

Kevin Goudreau Hypothetically if your going to do Lone Wolf actions, do it right, priority targets include Antifa, Canadian Anti Hate Network, ARC, any government organization like the Human Rights Commission elements in CSIS aiding them, any organization that has the words Anti-racist in it that actually means Anti-White, hate crimes units are all valid high value targets marked for future arrest, charges and execution for crimes against the white race and treason, any politicians that supports them, groups like Communists that fund them. Remember always double tap both hemispheres of the brain because some people survive a bullet to the head, bombing is combersom and clumsy, to much potential for collateral damage of innocent people getting hit by shrapnel etc. Women are often worst than the men besides being fat mouty NDP types but no children!

Like Reply 2h

This is **Exhibit « Z »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive style with a horizontal line extending from the end of the name.

A Commissioner of Oaths, etc.

CANADA
PROVINCE OF ONTARIO
PROVINCE DE L'ONTARIO
East / Est
(Region / Région)


BE IT REMEMBERED that on this day the persons named in the following schedule personally came before me and severally acknowledged themselves to owe to Her Majesty the Queen the several amounts set opposite their respective names: namely,
SACHEZ QUE, ce jour, les personnes nommées dans la liste qui suit ont personnellement comparu devant moi et ont chacune reconnu devoir à Sa Majesté la Reine les diverses sommes indiquées en regard de leurs noms respectifs, savoir :

Form / Formule 32
Sections / Articles 493, 550, 679,
706, 707, 810, 810.01, 810.1, 810.2
and / et 817
0411-998-19-PB30274
Case/File No. / N° du cas/dossier

NAME NOM	DATE OF BIRTH DATE DE NAISSANCE	OCCUPATION PROFESSION	AMOUNT MONTANT	CASH ESPÈCES
ACCUSED PRÉVENU Kevin GOUDREAU	03-October-1975		\$ 250	\$ <input type="checkbox"/>
Address Adresse	Street Peterborough ON		No Sureties No Deposit	
SURETY CAUTION			\$	\$ <input type="checkbox"/>
Address Adresse				
SURETY CAUTION			\$	\$ <input type="checkbox"/>
Address Adresse				
SURETY CAUTION			\$	\$ <input type="checkbox"/>
Address Adresse				

to be made and levied of their several goods and chattels, lands and tenements respectively, to the use of Her Majesty the Queen, if the said accused fails in any of the conditions hereunder written.
lesdites sommes devant être prélevées sur leurs biens et effets, terres et tènements, respectivement, pour l'usage de Sa Majesté la Reine, si ledit prévenu ne remplit pas les conditions ci-après énoncées.

Taken and acknowledged before me at the City of Ottawa
Fait et reconnu devant moi à/au du/de
on the 12th day of August, 2019
le jour de


Judge/Justice of the Peace in and for the Province of Ontario
Juge/Juge de paix dans et pour la province de l'Ontario
JUSTICE OF THE PEACE S. GOFFIN-BOYD

The condition(s) of the above written recognizance is that if the above named accused keeps the peace and is of good behaviour for the term of 12 Months months commencing on August 12, 2019
observe une bonne conduite pendant mois à partir du
AND / ET (other conditions/ autres conditions)


Do not communicate any threats of violence whether it be online or by any other means toward Richard Warman, Bernie Farber, Amira El Ghawaby, Evan Balgord.

Do not be within 200m of any place where you know Richard Warman to be present.

Do not possess any weapon(s) as defined by the Criminal Code (for example, but not restricted to, a pellet gun, firearm, imitation firearm, cross-bow, prohibited or restricted weapon or device, ammunition or explosive substance or anything designed to be used or intended for use to cause death or injury or to threaten or intimidate any person).

Do not apply for a possession and acquisition licence.

Signature of Surety / Signature de la caution


Signature of Accused / Signature du prévenu
Kevin GOUDREAU

Signature of Surety / Signature de la caution

Signature of Surety / Signature de la caution

FOR INFORMATION ON ACCESS TO ONTARIO COURTS
FOR PERSONS WITH DISABILITIES, CALL
1-800-387-4456
TORONTO AREA 416-326-0111



POUR PLUS DE RENSEIGNEMENTS SUR L'ACCÈS DES PERSONNES HANDICAPÉES
AUX TRIBUNAUX DE L'ONTARIO, COMPOSEZ LE
1-800-387-4456
RÉGION DE TORONTO 416-326-0111

This is **Exhibit « AA »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive style with a long horizontal stroke at the end.

A Commissioner of Oaths, etc.

Federal Court



Cour fédérale

Date: 20230925

Docket: T-1452-23

Citation: 2023 FC 1286

Ottawa, Ontario, September 25, 2023

PRESENT: The Honourable Mr. Justice Southcott

SIMPLIFIED ACTION

BETWEEN:

CARYMA SA'D

Plaintiff

and

MORGAN YEW, CANADIAN ANTI-HATE NETWORK, AND JOHN OR JANE DOE

Defendants

ORDER AND REASONS

I. Overview

[1] This Order and Reasons address a motion dated August 28, 2023, filed by the Defendants, the Canadian Anti-Hate Network and Morgan Yew, seeking an order under Rules 221(1)(a), (c) and (f) of the *Federal Courts Rules*, SOR/98-106 [Rules], striking the Statement of Claim in this matter, without leave to amend, and other ancillary relief.

[2] As explained in greater detail below, the Defendants' motion under Rule 221(1)(a) is granted, and the Statement of Claim will be struck without leave to amend, because it is plain and obvious that the Statement of Claim discloses no reasonable cause of action and therefore has no reasonable prospect of success, and the Plaintiff has failed to identify any amendment that might be capable of curing this deficiency. The Defendants' motions under Rules 221(1)(c) and (f) are dismissed, as Rule 298(1) requires that any such motion be brought only at a pretrial conference.

II. **Background**

[3] The Plaintiff, Caryma Sa'd, resides in Toronto, Ontario. She self-describes as being of Muslim upbringing and Indo-Palestinian ethnic descent. Her Statement of Claim pleads that she is a practising lawyer, as well as an independent journalist, regularly documenting public protests and fringe social movements, including by publishing her photographs and videos on social media with her commentary.

[4] The Statement of Claim, filed by the Plaintiff on July 12, 2023, pleads that the Defendant, Canadian Anti-Hate Network [CAHN], purports to be an antifascist and antiracist advocacy group based in Toronto, Ontario, organized as a not-for-profit corporation pursuant to the laws of Canada. CAHN states its mission as being to monitor, research, and counter hate groups by providing education and information on hate groups to the public, media, researchers, courts, law enforcement and community groups.

[5] The Statement of Claim pleads that the Defendant, Morgan Yew, resides in Toronto, Ontario and is an independent journalist who has published with CAHN. The Statement of Claim also names as Defendants John or Jane Doe, described as one or more individuals comprising CAHN's network, acting on CAHN's behalf, acting at CAHN's direction, or otherwise under CAHN's control or influence.

[6] In her Statement of Claim, Ms. Sa'd pleads that she, Mr. Yew, and CAHN are all journalistic entities documenting right-wing politics and extremism.

[7] The principal allegations in the Statement of Claim surround an event that Ms. Sa'd intended to host on July 10, 2021, in Toronto's Chinatown district, described as a comedy night at which Ms. Sa'd would interview and roast an individual she describes as a right-wing personality. In the days leading to the event, CAHN expressed concern about the event. While both parties opposed the views of this individual, they did not agree on whether the event would be effective in countering those views or rather would serve to promote them.

[8] On the evening of July 10, 2021, activists, which Ms. Sa'd describes as styling themselves as community defenders or community protectors, blockaded access to the venue where the event was to be held, and a physical altercation ensued. Ms. Sa'd alleges that Mr. Yew was among these activists. The event was cancelled as a result.

[9] On July 13, 2021, Ms. Sa'd released a statement explaining and apologizing for the event's outcome. Also on July 13, 2021, CAHN and Mr. Yew published an article about Ms.

Sa'd and the cancelled event, on CAHN's website <antihate.ca>. In the following days, CAHN also tweeted a summary of its article. The Statement of Claim alleges that this article was false and misleading and identifies particular statements in the article, and what Ms. Sa'd describes as missing context, in support of this allegation. The Statement of Claim describes the article overall as misleading its audience to conclude:

- A. that Ms. Sa'd supports fascism;
- B. that Ms. Sa'd is a racist;
- C. that Ms. Sa'd lied about the blockade's violence; and
- D. that Ms. Sa'd jeopardized the Chinatown community's safety.

[10] Ms. Sa'd pleads that, following correspondence between them, CAHN agreed to minor revisions to a handful of passages in its article. However, she alleges that, while the revised article correlated more closely with some facts, the revisions did not materially change the misleading character of the article. She alleges that, in publishing the updated article, CAHN refused to expressly specify which revisions had been made.

[11] The Statement of Claim further pleads that, from time to time, CAHN publishes materials encouraging counter-protestors to attend events and obstruct what it describes as "fake journalists". Ms. Sa'd alleges that she has been subjected to: (a) in-person harassment at rallies by counter-protesters employing such tactics; and (b) online sexism and racism, including by online personalities she names as John and Jane Doe.

[12] Based on these allegations, Ms. Sa'd invokes subsections 7(a) and (d) of the *Trademarks Act*, RSC 1985, c T-13 [TMA], and sections 36 and 52 of the *Competition Act*, RSC 1985, c C-34 [CA], and claims against the Defendants declaratory relief, injunctive relief, general damages of \$50,000, aggravated and exemplary damages of \$50,000, and costs. Details of these statutory provisions will be canvassed later in these Reasons. Ms. Sa'd filed her action as a simplified action under Rules 292 to 299.

[13] In the present motion, the Defendants, CAHN and Mr. Yew, move under Rules 221(1)(a), (c) and (f), to strike the Statement of Claim without leave to amend, and claim ancillary relief including costs. The Defendants filed their motion in writing under Rule 369 including written representations, Ms. Sa'd does not oppose the adjudication of this motion under Rule 369. She has filed written representations in response, and the Defendants have filed written representations in reply.

III. Issues

[14] The parties agree that this motion raises the following issues for adjudication by the Court:

- A. Whether, pursuant to Rule 221(1)(a), it is plain and obvious that the Statement of Claim discloses no reasonable cause of action;
- B. Whether, pursuant to Rule 221(1)(c), the Statement of Claim is scandalous, frivolous or vexatious;

- C. Whether, pursuant to Rule 221(1)(f), the Statement of Claim is otherwise an abusive process of the Court;
- D. Whether leave to amend the Statement of Claim should be granted; and
- E. Whether the Plaintiff should be prohibited from refileing the Statement of Claim against the Defendants.

IV. Analysis

- A. *Whether, pursuant to Rule 221(1)(a), it is plain and obvious that the Statement of Claim discloses no reasonable cause of action*

- (1) General Principles and Arguments

[15] The Defendants' written representations accurately describe the effect of Rule 221(1)(a), being that a pleading will be struck when it is plain and obvious that the claim discloses no reasonable cause of action and therefore has no reasonable prospect of success (see *Knight v Imperial Tobacco Canada Ltd*, 2001 SCC 42 [*Knight*] at para 17). In assessing the presence of a reasonable cause of action, the Court assumes that the facts as pleaded are true (see *Inuit Tapirisiat v Canada (Attorney General)*, [1980] 2 SCR 735 at para 4).

[16] The Defendants further assert that, to disclose a reasonable cause of action, a claim must: (a) allege facts that are capable of giving rise to a cause of action; (b) disclose the nature of the action that is to be founded on those facts; and (c) indicate the relief sought, which must be of a

type that the action could produce and that the Court has jurisdiction to grant. The pleading must plead material facts satisfying every element of the alleged cause of action (see *Fox Restaurants Concepts LLC v 43 North Restaurant Group Inc*, 2022 FC 1149 at paras 8-9).

[17] I do not understand the Plaintiff to take issue with these general principles.

[18] In arguing that the Statement of Claim fails to disclose a reasonable cause of action, the Defendants assert that the pleading is devoid of the requisite material facts necessary to satisfy a cause of action under any of the statutory provisions invoked therein. The Defendants argue that the Statement of Claim makes bald, vague and ungrounded allegations, representing speculative assumptions and sweeping conclusions in the nature of opinions rather than facts, and does not link these allegations to an actionable wrong under the statutory provisions upon which the Plaintiff relies.

[19] In response, the Plaintiff emphasizes the distinctions between Rules 174 and 175. Rule 174 requires every pleading to contain a concise statement of material facts on which the party relies, but not evidence by which those facts are to be proved. Rule 175 provides that a party may raise any point of law in a pleading. The Plaintiff acknowledges that material facts must be pleaded under Rule 174 but notes that, under Rule 175, the pleading of law is not mandatory. She argues that her Statement of Claim is therefore not required to link every material fact to a legal element.

[20] In their reply submissions, the Defendants assert that the Plaintiff's response has mischaracterized their position. The Defendants argue that they are not suggesting the Statement of Claim should be struck because it fails to include legal conclusions. Rather, they assert that the pleading is insufficient because it fails to include material facts supporting each element of the causes of action pleaded.

[21] Against this backdrop, I will return to the particular statutory causes of action invoked in the Statement of Claim.

(2) Subsection 7(a) of the *Trademarks Act*

[22] The Statement of Claim alleges that the article published by the Defendants and their subsequent tweets represent false or misleading statements actionable under subsection 7(a) of the TMA.

[23] Subsection 7(a) of the TMA provides that no person shall make a false or misleading statement tending to discredit the business, goods or services of a competitor. As explained recently in *Energizer Brands, LLC v Gillette Company*, 2023 FC 804 at para 169, the necessary elements of the statutory cause of action created by subsection 7(a) (in combination with subsection 53.2(1) of the TMA) are: (a) a false and misleading statement; (b) the statement tending to discredit the business, goods or services of a competitor; and (c) resulting damage, causally linked to the alleged wrongful activity, *i.e.*, the false or misleading statement.

[24] Importantly, for purposes of the Defendants' argument, the application of subsection 7(a) of the TMA is limited to creating a cause of action relating to false and misleading statements made about a trademark or other intellectual property of the claimant. While the cause of action created by subsection 7(a) is similar to other torts, its scope has been read down in order to be constitutionally valid, as subsection 7(a) can be a constitutionally valid enactment of the federal Parliament only if it is limited to rounding out the regulatory scheme in the TMA (see *Canadian Copyright Licensing Agency v Business Depot Ltd*, 2008 FC 737 at para 27, citing *Vapour Canada Ltd v MacDonald*, [1977] 2 SCR 134 [*Vapour*] at pp 172-173).

[25] The Defendants argue that the Statement of Claim pleads no material facts to the effect that the Defendants' alleged false or misleading statements were made in association with some intellectual property of the Plaintiff. The Defendants submit that no amendment to the Statement of Claim could cure this deficiency. As the Defendants further argue in their reply representations, the Plaintiff's written representations do not address the obvious deficiency as to what intellectual property is being asserted in support of her claim under subsection 7(a) of the TMA.

[26] I agree with the Defendants that this deficiency is fatal to the Plaintiff having a reasonable cause of action under subsection 7(a) of the TMA and that there is no indication in the Plaintiff's representations of any amendment that might be capable of curing this deficiency.

[27] The Defendants raise several other arguments in support of their position that the Plaintiff's pleading under subsection 7(a) is deficient in material facts. However, having

identified the above fatal deficiency, it is not necessary for the Court to address the Defendants' other arguments.

(3) Subsection 7(d) of the *Trademarks Act*

[28] The Statement of Claim alleges that, as CAHN's activities in fact promoted hateful conduct against Ms. Sa'd, a member of an equity-seeking minority group, CAHN's use of any sign as a trademark that includes ANTI-HATE is a description that is false and likely to mislead the public as to services that CAHN provides, contrary to subsection 7(d) of the TMA.

[29] Subsection 7(d) of the TMA provides that no person shall make use, in association with goods or services, of any description that is false in a material respect and likely to mislead the public as to (i) the character, quality, quantity or composition, (ii) the geographical origin, or (iii) the mode of the manufacture, production or performance, of the goods or services.

[30] Like subsection 7(a), subsection 7(d) requires an involvement with intellectual property (see *Living Sky Waters Solutions Corp v ICF Pty Ltd*, 2018 FC 876 [*Living Sky*] at para 21, citing *Vapour* at para 64). However, subsection 7(d) is intended to prohibit the misuse of the description by a person in association with offering his or her goods or services to the public (see *Living Sky* at paras 26-27, citing *Vapour* at para 22).

[31] As emphasized in her written submissions, the Plaintiff alleges that CAHN's name and web address use or include the term ANTI-HATE as an unregistered word mark element and that

such use represents a false description of the character of CAHN's services because, in her submission, CAHN's services actually promote hate.

[32] I am conscious of the Defendants' argument that the Plaintiff's allegation, that CAHN promotes hate, represents the Plaintiff's opinion or an argumentative conclusion and is not a factual allegation of the sort required to support a claim under section 7 of the TMA. Indeed, this claim would be novel territory for the law of trademark. However, I am also conscious of the Plaintiff's argument that, on a motion to strike, the Court should err on the side of permitting a novel but arguable claim to proceed to trial (see *Knight* at para 21).

[33] In the case at hand, it is unnecessary for the Court to adjudicate that particular set of arguments, as I find that the Plaintiff's subsection 7(d) claim must fail for more technical reasons. As the Defendants submit, subsection 7(d) requires the claimant to establish a causal link between the use of a false and misleading statement and the claimant's alleged damage (see *Videotron Ltee v Konek Technologies Inc*, 2023 FC 741 at para 22; *EAB Tool Company Inc v Norske Tools Ltd*, 2017 FC 898 at para 76). The Defendants argue that the Statement of Claim includes no material facts in support of an allegation that the alleged false description ANTI-HATE resulted in damage to the Plaintiff causally linked to such description.

[34] In response, the Plaintiff argues that there is no factual element to the question of causation. Rather, causation is a matter of law. She relies on *599960 Ontario Inc v Taylor Steel Inc*, 2000 CarswellOnt 432 [*Taylor Steel*] at para 20 (Ont Sup Ct J) (aff'd 2001 CarswellOnt

4102 (Ont CA)), which quoted the following excerpt from Prof. Fleming (*The Law of Torts*, 7th ed (Sydney: The Law Book Company Ltd., 1987) at 675-6):

Neither actual deception nor actual resulting damage need be proved. It is sufficient that the defendant's practice was likely to mislead the public and involved an appreciable risk of detriment to the plaintiff, whether in diversion of sales or impairment of his credit or commercial repute. ...

[35] As the Defendants submit in reply, *Taylor Steel* addressed a claim under the tort of passing off, not an action under subsection 7(d) of the TMA. Neither the Statement of Claim nor the Plaintiff's written submissions on this motion asserts a causative relationship between CAHN's use of the allegedly false description ANTI-HATE and any damages she has suffered. I find that this deficiency is fatal to the Plaintiff having a reasonable cause of action under subsection 7(d) of the TMA and that she has provided no indication of any amendment that might be capable of curing this deficiency.

(4) Sections 36 and 52 of the *Competition Act*

[36] Finally, again referencing the article published by the Defendants and their subsequent tweets as false or misleading statements, the Statement of Claim invokes sections 36 and 52 of the CA.

[37] Subsection 36(1)(a) creates a statutory cause of action in favour of any person who has suffered loss or damage as a result of conduct that is contrary to any provision of Part VI of the CA. Part VI includes subsection 52(1), which provides that no person shall, for the purpose of promoting, directly or indirectly, the supply or use of a product or for the purpose of promoting,

directly or indirectly, any business interest, by any means whatever, knowingly or recklessly make a representation to the public that is false or misleading in a material respect.

[38] As the Defendants submit, the test under subsection 52(1) of the CA is the same as the test under subsection 7(a) of the TMA (*i.e.*, a false and misleading statement; the statement tending to discredit the business, goods or services of a competitor; and resulting damage causally linked to the false or misleading statement), with the exception that subsection 52(1) also requires that the representation be made with knowledge of or recklessness as to its falsity (see *Alliance Laundry Systems LLC v Whirlpool Canada LP*, 2019 FC 724 at para 79).

[39] Taking into account the Defendants' arguments related to the common elements in these two tests, again the Defendants' submissions raise several arguments in support of their position that the Plaintiff's pleading is insufficient to support a reasonable cause of action under the CA. These arguments include the submission that the Statement of Claim contains no material facts establishing that the Defendants made the impugned statements while knowing them to be false or misleading or with recklessness in relation thereto.

[40] In response to the Defendants' arguments surrounding allegations of their knowledge or recklessness, the Plaintiff references her pleading that CAHN agreed to minor revisions to a handful of passages in the article that was originally published on July 13, 2021, but did not publish an articulation of the scope of the revision. She argues that this conduct shows knowledge or recklessness in connection with a false or misleading representation.

[41] I am not convinced that this response assists the Plaintiff. I understand her argument to be that the Defendants' publication of an updated version of the impugned article demonstrates that the Defendants knew that portions of the original article were false or misleading. However, logically the Plaintiff's submission speaks only to the Defendants' knowledge at the time it published the revision, and the Plaintiff has not explained how the Defendants' alleged refusal to publish an articulation of the scope of the revision speaks to any knowledge or recklessness surrounding false or misleading content.

[42] Again, I find the Plaintiff's pleading fatally deficient in demonstrating a reasonable cause of action and that the Plaintiff has failed to identify any amendment that might be capable of curing this deficiency.

[43] In conclusion under Rule 221(1)(a), I find that it is plain and obvious that the Statement of Claim discloses no reasonable cause of action and therefore has no reasonable prospect of success, and my Order will strike the Statement of Claim in its entirety, without leave to amend.

B. *Whether, pursuant to Rule 221(1)(c), the Statement of Claim is scandalous, frivolous or vexatious*

[44] In addition to its arguments under Rule 221(1)(a), the Defendants submit that the Statement of Claim should be struck under Rule 221(1)(c) on the basis that it is scandalous, frivolous or vexatious. The Defendants note that the Statement of Claim is primarily centred on excerpts from CAHN's July 13, 2021 article and argue that the TMA and CA are not the proper vehicles to pursue relief arising from the article. The Defendants submit that, after missing the

two year limitation period for a libel action, over which the Federal Court has no jurisdiction, the Plaintiff has attempted to warm up a stale libel claim under the guise of TMA and CA principles.

[45] By way of substantive response, the Plaintiff submits that the fact her allegations may have been actionable for defamation does not preclude her having viable claims under the TMA or CA. However, the Plaintiff also raises a preliminary technical argument, noting that this proceeding was brought by way of simplified action and that, pursuant to Rule 298, a motion under Rule 221(1)(c) can be brought only at a pretrial conference.

[46] I agree with the Plaintiff's technical submission. Rule 298(1) provides that a motion in a simplified action shall be returnable only at a pretrial conference. Rule 298(2) provides a limited exception to this principle, for motions to object to the jurisdiction of the Court or to strike a statement of claim on the grounds that it discloses no reasonable cause of action. As such, while the Defendants' motion under Rule 221(1)(a) is properly before the Court, its motion under Rule 221(1)(c) is not.

[47] In its reply submissions, the Defendants argue that the Court has the jurisdiction to remove this action from the operation of Rule 298(1). The Defendants note that their Notice of Motion requested several categories of relief, including such further and other relief as the Court deems just. In their reply submissions, the Defendants request that the Court order that the simplified action provisions of the Rules not apply to this action, so that the Court can adjudicate their Rule 221(1)(c) arguments.

[48] I am not prepared to accede to this request. If the Defendants intended to seek relief from the operation of the simplified action provisions, they should have expressly sought such relief in their Notice of Motion, identifying relevant grounds, and presented evidence and/or argument in support of that relief. The Plaintiff would then have had an opportunity to respond to that request.

[49] As such, my Order will dismiss the Defendants' motion under Rule 221(1)(c).

C. *Whether, pursuant to Rule 221(1)(f), the Statement of Claim is otherwise an abusive process of the Court*

[50] The Defendants also argue that the Statement of Claim should be struck under Rule 221(1)(f) on the basis that it is an abuse of the process of the Court, because it is devoid of any evidentiary foundation. The Defendants also rely on evidence they have filed in this motion, identifying that since June 2023 the Plaintiff has initiated two other actions in the Federal Court against other organizations.

[51] Again, the Plaintiff responds that a motion under Rule 221(1)(f) can be brought only at a pretrial conference. For the same reasons as explained above in relation to the Defendants' motion under Rule 221(1)(c), my Order will dismiss the Defendants' motion under Rule 221(1)(f).

D. *Whether the Plaintiff should be prohibited from refiling the Statement of Claim against the Defendants*

[52] While the parties' list of issues includes whether the Court should grant the Plaintiff leave to amend her Statement of Claim, I have dealt with that issue earlier in these Reasons. As such, the remaining issue is the request in the Defendants' Notice of Motion for an order prohibiting the Plaintiff from refiling the Statement of Claim against the Defendants or, in the alternative, requiring that the Plaintiff comply with any and all costs orders made in respect of this action before refiling the Statement of Claim against the Defendants.

[53] The Defendants have not cited any authority in support of these categories of relief. In their written representations, the Defendants argue that, given the frivolous nature of the allegations contained in the Statement of Claim, the Plaintiff should be prohibited from refiling it. As the Defendants' position appears to be related to their arguments under Rule 221(1)(c) that the Statement of Claim is frivolous, and as I have dismissed the motion under Rule 221(1)(c), I also decline to grant these categories of relief.

V. Costs

[54] The Defendants' Notice of Motion seeks costs of this motion "awarded at the highest allowable basis". However, other than repeating that request, their written representations provide no submissions in support of their claim for costs or its quantification.

[55] The Plaintiff's written representations, seeking dismissal of the motion, argue that costs of the motion should be awarded in favour of the Plaintiff.

[56] The Defendants have not succeeded on all grounds raised in this motion. However, as my Order will strike the Statement of Claim without leave to amend, the Defendants have succeeded in obtaining the principal relief sought, and an award of costs in their favour is therefore appropriate. I find no basis to award such costs at an elevated level. Rather, my Order will award lump-sum costs in the amount of \$850.00.

ORDER IN T-1452-23

THIS COURT ORDERS that:

1. The Defendants' motion under Rule 221(1)(a) is granted, and the Plaintiff's Statement of Claim is struck, without leave to amend.
2. The Defendants' motion under Rules 221(1)(c) and (f) is dismissed.
3. The Plaintiff shall pay the Defendants, the Canadian Anti-Hate Network and Morgan Yew, costs of this motion in the lump sum amount of \$850.00.

"Richard F. Southcott"

Judge

This is **Exhibit « BB »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive style with a long horizontal stroke at the end.

A Commissioner of Oaths, etc.

Class-action-w-vincent-gircys
VIDEO LINK

This is **Exhibit « CC »** to the Affidavit of Richard Warman, sworn remotely by Richard Warman, stated as being located in the City of Manama, Bahrain, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive style with a long horizontal stroke at the end.

A Commissioner of Oaths, etc.

Trudeau-sued-w-vincent-gircys
VIDEO LINK

EDWARD CORNELL et al.
Plaintiffs

-and-

JUSTIN TRUDEAU et al.
Defendants

Court File No.: CV-24-94733

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at Ottawa

AFFIDAVIT OF RICHARD WARMAN

CAZA SAIKALEY s.r.l./LLP
Lawyers | Avocats
1420 – 220 Laurier Avenue West
Ottawa, ON K1P 5Z9

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jsaikaley@plaideurs.ca
Albert Brunet (LSO# 74233U)
abrunet@plaideurs.ca
Tel: 613-565-2292

Lawyers for the Defendants,
Canadian Anti-Hate Network and Bernie
Farber

Court File No.: CV-24-00095074-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N :

EDWARD CORNELL, VINCENT GIRCYS, LINDSAY MILNER, SHAUN ZIMMER, ANDREW MILLER, JONKER TRUCKING INC., ANDREW FERA, WAYNE NARVEY, CLAYTON MCALLISTER, KATHLEEN MARKO, NICOLA FORTIN, ARIELLE FORTIN, THOMAS QUIGGIN, TIMOTHY TIESSEN O'JAY LAIDLEY, ERIC BUECKERT, PETER TERRANOVA, NANCY TERRANOVA, RICHARD OCELAK, and KERRI-ANN HAINES

Plaintiffs

-and-

JUSTIN TRUDEAU, CHRYSTIA FREELAND, DAVID LAMETTI, DOMINIC LEBLANC, BILL BLAIR, MARCO MENDICINO, ATTORNEY GENERAL OF CANADA, JODY THOMAS, ROYAL CANADIAN MOUNTED POLICE, DENIS BEAUDOIN, BRENDA LUCKI, STEVE BELL, ROBERT BERNIER, OTTAWA POLICE SERVICES BOARD, OTTAWA POLICE SERVICE, THE TORONTO-DOMINION BANK, CANADIAN IMPERIAL BANK OF COMMERCE, BANK OF MONTRÉAL, NATIONAL BANK OF CANADA, ROYAL BANK OF CANADA, BANK OF NOVA SCOTIA (SCOTIABANK), CANADIAN TIRE SERVICES LTD. doing business as CANADIAN TIRE BANK, MERIDIAN CREDIT UNION, ASSINIBOINE CREDIT UNION, GULF & FRASER CREDIT UNION, STRIDE CREDIT UNION, SIMPLII FINANCIAL, CANADIAN ANTI-HATE NETWORK, BERNIE FARBER, JOHN DOE, and ABC CORP.

Defendants

AFFIDAVIT OF BERNIE FARBER

I, **BERNIE FARBER**, of the City of Toronto in the Province of Ontario, **MAKE OATH AND SAY:**

1. I am one of the named Defendants in this matter. As such, I have personal knowledge of the information hereinafter deposed. Where I make statements in this affidavit based on information that is not within my personal knowledge, I have provided the source of such information and have stated my belief that the information is true.

Background

2. I am the Founding Chair Emeritus of the Canadian Anti-Hate Network (“CAHN”). I have spent my career dedicated to issues relating to human rights, anti-racism, pluralism, and inter-ethnic/faith/race relations. I publish commentary in the media and am interviewed regularly on these issues. I have also been cited in a number of academic publications and in several books, newspapers and magazines.

3. I was the head of several Non-Governmental Organizations and Foundations, including the Canadian Jewish Congress, the Paloma Foundation, and the Mosaic Institute. I have received numerous awards for my civil rights work, including the Queen’s Diamond Jubilee medal, the Government of Canada’s 125 Commemorative medal, and the Ontario Association of Chiefs of Police Award for Outstanding Service and Dedication to Policing in the province of Ontario.

4. I have been diagnosed with a health issue for which I am receiving ongoing treatment from medical specialists. Frankly, my health condition should be private. So even releasing it here in this affidavit deeply concerns me that it could be extrapolated and used for inappropriate purposes by those who oppose CAHN and its activities.

5. This litigation, and its requested relief of an order of damages for \$44,000,000, is a source of stress and diversion from what little energy I have during these difficult times. This litigation has caused me unnecessary concern and anxiety at a time when my full attention should be directed towards my health.

6. This litigation also has a chilling effect on my ability to comment on issues of public importance. The important legal fees involved with defending against a claim such as this one limits my ability and desire to speak out on issues relating to hate groups and human rights. Even though I do not believe I have done anything unlawful, the necessity and cost of defending these proceedings necessarily makes me “think twice” before engaging in these actions.

The Public Interest in the Ottawa Protests and My and CAHN’s Expressions

7. I was interested in the so called “Freedom Convoy” movement, which culminated with the protests that occupied the downtown of Ottawa in January and February 2022 (the “Ottawa

Protests”). My interest stemmed from the connections between the movement and various elements of the far right.

8. During that same period, I made several media appearances and provided quotes for various articles found during an online media search, outlined below.

9. On January 30, 2022, I was interviewed on CBC News. A hyperlink to a copy of the YouTube video of that interview is attached as **Exhibit A**.

10. In that CBC News interview, I spoke about the presence of the swastika in Ottawa during the protests. I stated that, in my opinion, the protests seeded the ground for one of the worst displays of Nazi propaganda that I had ever seen in this country (i.e. the swastika). I continue to hold this view.

11. In response to a question posed about protestors who may not be “extremists”, I replied that I was supportive of people’s democratic right to protest issues relating to vaccinations and COVID-19 government responses (even though I did not agree with the positions taken by these protestors). However, by associating themselves with this protest, they were “walking in the shoes” of bigots, Nazis, racists and bullies. I raised concerns about the role “extremists” may have played in organizing or taking over the agenda of the protests.

12. I noted in the interview my concern with the protestors who defaced the Terry Fox statue and the “malcontent” people urinating on the National War Memorial. I also spoke about the response (or lack thereof) of various politicians. I stand by these views.

13. Unless the Plaintiffs are individuals that are captured by my above-noted comments as having partaken in certain undesirable and inappropriate activities, the Plaintiffs were not the subjects of my comments.

14. On January 31, 2022, I gave an interview to NBC News, and it then published an article on its website entitled “Police investigate ‘illegal’ acts at Canadian anti-vaccine mandate rallies”. The article quotes me as stating that “while the protests may have started with the intention of demonstrating against COVID vaccine mandates, by the end of the weekend, they had effectively been co-opted by the far-right”. I also spoke about the presence of swastikas on Parliament Hill. A copy of the article is attached as **Exhibit B**. None of the Plaintiffs are the subjects of my comments.

15. On February 8, 2022, the Toronto Star published an article on its website entitled “Why banning hateful symbols like the swastika is nearly impossible”. The article quoted me and concerns enacting legislation to prohibit or penalize the display of hateful symbols, such as the swastika. A copy of the article is attached as **Exhibit C**. None of the Plaintiffs are the subjects of my comments.

16. On February 11, 2022, the Toronto Star published an article on its website entitled “Honk if you love Jesus — Why so many Evangelical Christians have joined the 'Freedom Convoy’”. In the article, I am quoted as dismissing the false equivalence drawn by certain protesters between how anti-vaxxers were being treated by reference to those who suffered through the Holocaust. I expressed my view that I would not feel safe setting foot on Parliament Hill. A copy of the article is attached as **Exhibit D**. None of the Plaintiffs are the subjects of my comments.

Response to Specific Allegations

17. I have no knowledge of speaking with any of the other individual Defendants (or representatives of the corporate Defendants) to this action about the “Freedom Convoy”, the Ottawa protests, or the invocation of the Emergencies Act, prior to that legislation being invoked on February 14, 2022.

18. I have no knowledge of signing any contract and do not otherwise have any contractual relationship with any of the Plaintiffs.

19. I have no knowledge of any contractual relationship between the Plaintiffs and the other Defendants prior to the issuance of the Statement of Claim.

20. I do not hold any public office.

21. I have no knowledge of having seized or disturbed any of the Plaintiffs’ chattels.

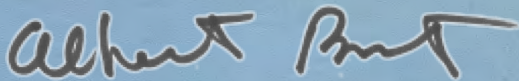
22. I have no knowledge of having initiated any form of legal process against any of the Plaintiffs.

23. I have no knowledge of having been in physical proximity to any of the Plaintiffs during the “Freedom Convoy” or the Ottawa Protests, particularly since I live in Toronto.

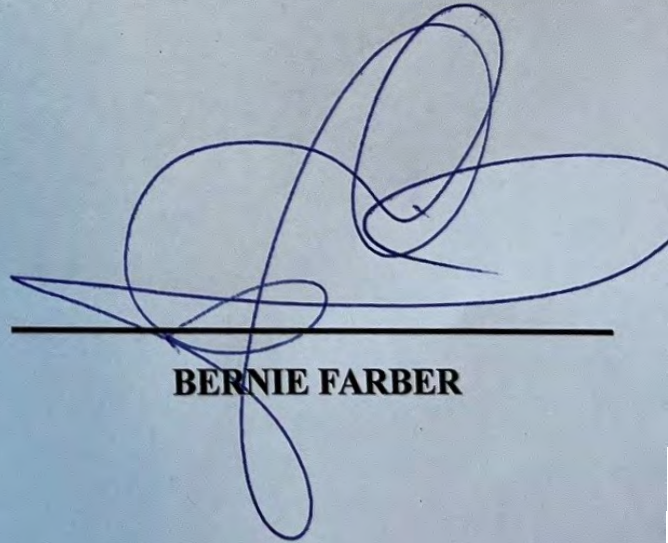
24. I made no threat to injure any of the Plaintiffs.

25. I have no knowledge of making any untrue or malicious statement to a third party disparaging the Plaintiffs' businesses or property.
26. I have no knowledge of any agreement between any of the co-Defendants to cause harm or damage to any or the Plaintiffs, or any agreement whatsoever.
27. I did not receive from any of the Plaintiffs a Notice of Libel or any other document purporting to be notice pursuant to the provisions of the *Libel and Slander Act*, R.S.O. 1990, c. L.12.
28. I swear this affidavit in support of the motion to dismiss this action pursuant to s. 137.1 of the *Courts of Justice Act* and for no other improper purpose.

SWORN REMOTELY by Bernie Farber, stated as being located in the city of Toronto, Province of Ontario, before me in the city of Ottawa, Province of Ontario, on the 31st day of May, 2024, in accordance with O.Reg 431/20, *Administering Oath of Declaration Remotely*.



A Commissioner of Oaths, etc.



BERNIE FARBER

This is **Exhibit « A »** to the Affidavit of Bernie Farber, sworn remotely by Bernie Farber, stated as being located in the City of Toronto, Ontario, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive style with a long horizontal stroke at the end.

A Commissioner of Oaths, etc.

CBC News – Interview with Bernie Farber
VIDEO LINK

This is **Exhibit « B »** to the Affidavit of Bernie Farber, sworn remotely by Bernie Farber, stated as being located in the City of Toronto, Ontario, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive, somewhat stylized font.

A Commissioner of Oaths, etc.

WORLD

Police investigate 'illegal' acts at Canadian anti-vaccine mandate rallies

Former President Donald Trump commended the Freedom Convoy protesters Saturday for “resisting bravely these lawless mandates.”

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Jan. 31, 2022, 1:21 PM EST / Updated Jan. 31, 2022, 8:08 PM EST

By Chantal Da Silva

Police in Canada's capital have opened “several criminal investigations” following reports of demonstrators urinating on the country's National War Memorial, desecrating a statue dedicated to Canadian hero Terry Fox and carrying flags with swastikas during weekend anti-vaccine mandate protests.

Dubbed the "Freedom Convoy," hundreds of trucks and other vehicles blocked downtown streets as demonstrators also rallied on foot.

The protests initially started with plans to protest a vaccine requirement for cross-border drivers. However, the rallying cries appeared to quickly shift focus to broader opposition to the Trudeau government and vaccine mandates across the country.

In the midst of the chaos, Canadian Prime Minister Justin Trudeau and his family left their downtown Ottawa home on Saturday because of security concerns, according to [Reuters](#).



— Protesters in Ottawa rally Saturday against vaccination mandates for cross-border truck drivers. Patrick Doyle / Reuters

Speaking [at a virtual news conference Monday](#), Trudeau said he believed that many of the demonstrators did not represent truckers or "the vast majority of Canadians." He also revealed that he had [tested positive for Covid-19](#).

In the days before the protest, Trudeau [said that the convoy represented only a "small fringe minority,"](#) and that it's "important to underline that 90 percent of truckers in this country are

While the protests had been considered largely peaceful, the Ottawa Police Service said in a [tweet](#) Sunday that several criminal probes had been launched in connection to the demonstrations.

Specifically, police said they were investigating the alleged "desecration" of the National War Memorial, as well as of a statue honoring Fox, a cancer patient and amputee who gained national fame after launching a fundraising trek across Canada in 1980 to raise money for cancer research.

Fox died of cancer in 1981 before he was able to complete the journey, but he is remembered as a national icon whose campaign has seen millions of dollars raised in his memory.

In photos shared on social media, an upside down Canadian flag could be seen on the statue with a sign that said "mandate freedom."

Sharing a [tweet with an image of the desecrated statue](#), Brad West, the mayor of Fox's hometown in British Columbia, Port Coquitlam, condemned the incident, writing: "Whatever your cause, you don't get to appropriate (Fox's) legacy and you don't touch his statue. Ever."

Police said they were also investigating reports of “threatening/illegal/intimidating behavior to police/city workers and other individuals.”

“Illegal behavior will not be tolerated and will be fully investigated,” the department said, adding that it had “investigative and evidence-gathering teams in place to support the management of the demonstration.”

A number of Confederate flags and flags bearing swastikas were also spotted among the crowds, according to Canadian officials and witnesses, with photos also appearing to confirm the presence of Confederate flags.

‘The ultimate sign of evil’

Transport Minister Omar Alghabra [told Canadian broadcaster CTV](#) that while not all of those at the rally appeared to express hateful views, those who did should be condemned.

“Some of the images and the voices that we heard come out of that protest were alarming. Canadians saw for themselves. We had swastika flags, we had the Confederate flag, we had voices that called for the overthrow of the government,” Alghabra said. “Canadians saw for themselves that some voices are really disturbing and unacceptable.”



— Supporters arrive at Parliament Hill in Ottawa on Saturday for the Freedom Convoy demonstration, which blocked city downtown. Lars Hagberg / AFP - Getty Images

The Canadian Anti-Hate Network, a nonprofit group that monitors hate groups, far-right groups and hate crimes in Canada, asserted that some of the organizers of the protests, including people behind crowdfunding initiatives to support them, appeared to be associated with "the far-right movement" in Canada.

In a [statement on its website](#), the network said multiple organizers and individuals promoting fundraising efforts to support the protests were "previously known figures in Canada's far-right ecosystem."

In an interview Monday with NBC News, Bernie Farber, chair of the Canadian Anti-Hate Network, said that while the protests may have started with the intention of demonstrating against Covid vaccine mandates, by the end of the weekend, they had effectively been co-opted by the far-right.

"I think that this particular so-called Freedom Convoy really was able to take advantage of that frustration and it did ... allegedly start out as a protest against health mandates and vaccine mandates," he said. But, he added: "You don't need a large number of people to co-opt a protest like this. You need a few instigators, you need a couple of Nazi flags and Confederate flags, and the media quite rightly so starts focusing in on that."

Farber, whose father survived the Holocaust, described his own horror seeing flags bearing swastikas on Ottawa's Parliament Hill.

"To me, the swastika is the ultimate sign of evil, poison and hatred," he said. "To see one swastika flag flying on Parliament Hill is as shocking and bewildering to me as it is to most Canadians."

Protesters harassed soup kitchen workers, mayor says

In an [interview with the Canadian Broadcasting Corporation](#), Ottawa Mayor Jim Watson said some demonstrators had harassed workers at a soup kitchen, demanding free meals because their refusal to comply with mask mandates meant they were unable to order food in restaurants.

"These kinds of actions, the swastikas, Confederate flags and the like ... really hurt the credibility of the organizers," he said.



— A Confederate flag with an image of a truck across it at a demonstration protesting Covid vaccination mandates in front of Parliament in Ottawa. Dave Chan / AFP - Getty Images

On the official Facebook page for the rally, organizers condemned some of the actions reported over the weekend, writing: “We do not condone any disrespectful behavior.”

On Saturday, the Canadian Trucking Alliance, which represents truckers in the country, issued its own statement condemning reports of demonstrators having desecrated the National War Memorial as a “disgusting act” and a “dishonor to those soldiers who have given their lives for our country and those Canadian soldiers who continue to fight for our freedom today.”

In an earlier statement, it also made its stance on the backlash to rules requiring truck drivers to be vaccinated clear, saying: “The only way to cross the (U.S.-Canada) border, in a commercial truck or any other vehicle, is to get vaccinated.”

“As an industry we must adapt and comply with this mandate and the vast majority have,” the alliance said.

By early Monday morning, Farber said trucks remained parked on the streets near Parliament as lawmakers were expected to resume work after a winter break.

Some truckers said they would not leave until vaccine mandates were overturned, Reuters reported. Meanwhile, the Ottawa Police [said residents should avoid traveling](#) into the city's downtown core.

The protests come as Canada continues to battle a recent rise in Covid cases fueled by the spread of the omicron variant.

Covid cases surged to their highest numbers so far in the pandemic in early January, reaching tens of thousands of confirmed cases in a single day, before continuing to decline over recent weeks.

As of Sunday, the Canadian government [said it had recorded a total of 102,735 confirmed Covid cases](#) within a seven-day span.



Chantal Da Silva

Chantal Da Silva reports on world news for NBC News Digital and is based in London.

Reuters and Associated Press contributed.

This is **Exhibit « C »** to the Affidavit of Bernie Farber, sworn remotely by Bernie Farber, stated as being located in the City of Toronto, Ontario, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Burt". The signature is written in a cursive style with a long horizontal stroke at the end.



A Commissioner of Oaths, etc.

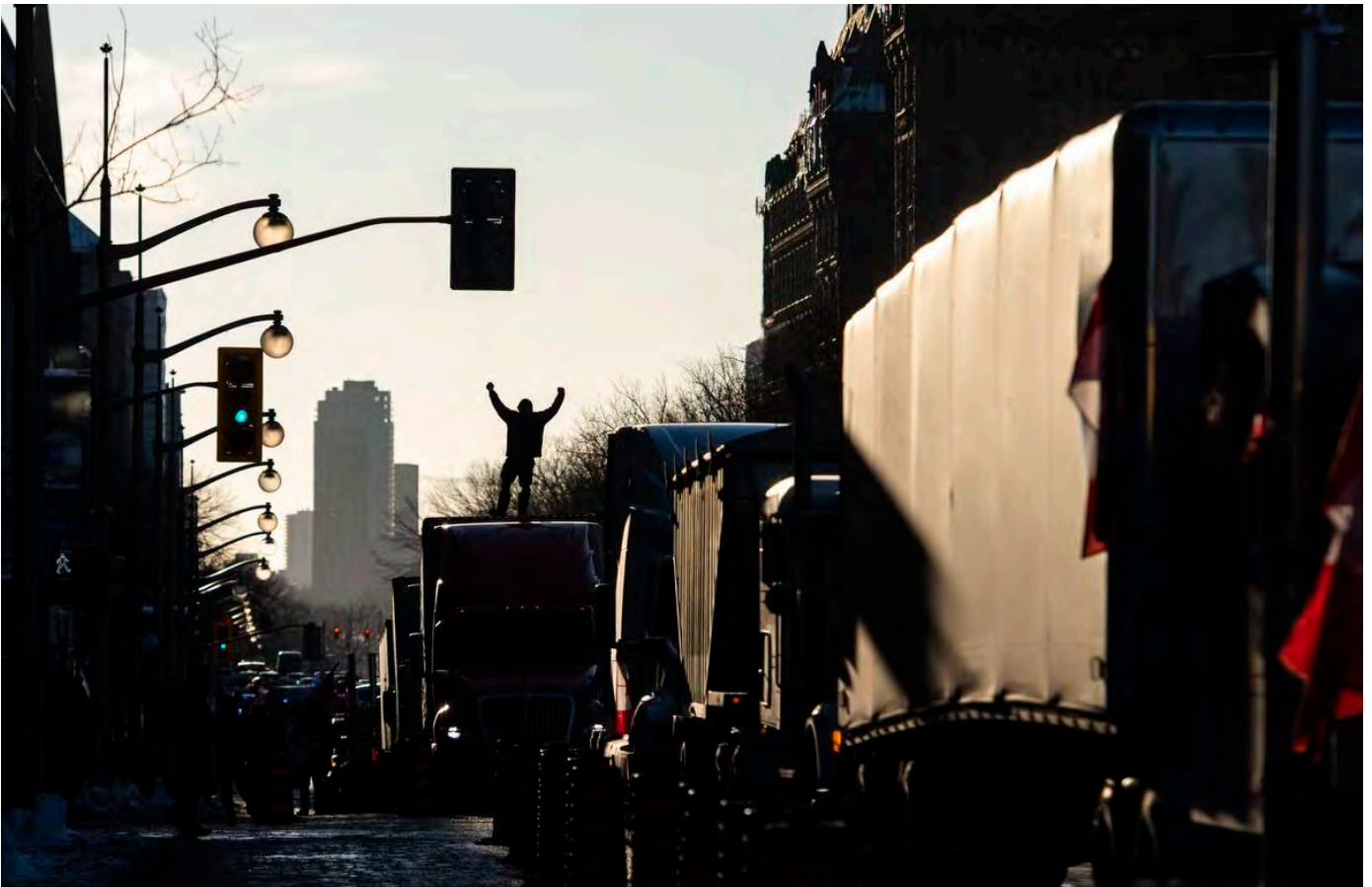
Home / News / Canada

CANADA

Why banning hateful symbols like the swastika is nearly impossible.

NDP MP introduces a bill to prohibit hateful symbols, but Bernie Farber, a supporter of the move in principal, concedes there would be practical obstacles to enforcement.

Feb. 8, 2022  



A person pumps both fists while standing atop a transport truck after arriving in front of on Parliament Hill as part of the 'Freedom Convoy' in Ottawa, on Friday, Jan. 28, 2022.

Justin Tang / The Canadian Press

By Omar Mosleh Edmonton Bureau

Bernie Farber is no stranger to the swastika.

fighting antisemitism and hate through his previous role at the Canadian Jewish Congress and now as chair of the Canadian Anti-Hate Network.

He said he sees hate symbols and swastikas more than he wants to think about — he’s accustomed to seeing them hanging in dingy basements, scrawled on pay phones or proliferating in the darkest corners of the internet.

“But when you see them at the seat of your Parliament, when you see them at the head of government, surrounded by thousands of people walking right by it as if it’s just another flag? It’s horrifying to me,” Farber said.

The appearance of a Nazi flag at the “Freedom Convoy” in Ottawa drew widespread condemnation from across the political spectrum. Opponents of the protest said it was proof of white supremacist sympathies lurking beneath the movement’s surface, while supporters said it was unfair to paint the entire convoy as hateful because of a few bad actors.

Last week, NDP MP Peter Julian tabled a private member’s bill to prohibit the sale and display of hateful symbols. However, law experts say an outright ban on certain symbols would present legal and moral complexities and could take the government down the slippery slope of criminalizing people for their beliefs rather than actions.

Others point out that there are already provisions in the Criminal Code to penalize hateful speech and actions, but anti-racism advocates say sometimes the threshold needed to be met is so high the law is effectively useless.

Farber, who is equally committed to stamping out all forms of hate as part of his day job, admits the sight of a Nazi flag hits him particularly hard. His father’s entire family was murdered in the Treblinka extermination camp in Poland, including his wife, two children and all his relatives.

Max, Farber’s father, managed to survive by prying out a board in a Nazi cattle car and jumping off, before fleeing and finding a Russian farmer who agreed to hide him. He spent three months lying prone in a makeshift grave

Max was the only Jewish survivor of his town. Farber remembers his mother telling him it took her five years to teach Max how to smile again.

“So you can understand that when I see a swastika and I understand what it did to my family alone, never mind thousands of other Jewish families, families of Roma, LGBTQ people in Europe,” Farber said.

“And that’s what the swastika represents. And when people walk right by it, in the country that my late father chose to come and stand for freedom? It’s soul destroying.”

Farber said he supports Julian’s bill in principle but he also acknowledges it would be challenging to list every hate symbol and decide which ones should be prohibited.

Furthermore, he points out that there are already provisions in the Criminal Code that criminalize certain forms of hateful expression, such as the charges of public incitement of hatred and wilful promotion of hatred. However, “the rare times that it is applied, the police and sometimes the Crown make it so onerous that it’s almost a worthless law,” Farber said.

As an example, he pointed to the [conviction of James Sears](#) on charges of wilful promotion of hatred for publishing an antisemitic newsletter that was mailed to homes in East York. Even then, Farber said, it took eight years of advocacy from several professional bodies to bring Sears to trial.

Farber praised Julian for tabling the bill but said at the end of the day, it requires people to enforce it. He also has concerns about whether it would meet a constitutional challenge.

Whenever there is talk of banning or prohibiting anything, there is inevitable pushback citing freedom of speech. But freedom of speech in Canada comes with limits.

There’s an extremely high bar for convicting someone of hate crimes because the courts recognize the importance of liberty and the potential lifelong consequences of a criminal conviction, said Eric Adams, a

THE KEY DISTINCTION THAT BRINGS HATEFUL CONDUCT INTO CRIMINAL TERRITORY IS criminal intent, known in legalese as *mens rea*. There has to be a clear intention to “spread hate” — to effectively sway others. This is why an antisemitic newsletter mailed to people’s homes would meet the threshold, but a lone wolf standing at a protest with a Nazi flag may not, because it could be defended as simply expressing one’s own beliefs.

“You don’t have a right to conduct yourself in a violent manner and call that expression,” Adams said. “But even something as hateful as a Nazi flag or a Confederate flag, which have a certain degree of violence standing behind them, are still acts of speech rather than acts of violence — at least in the characterization of our jurisprudence.”

Another argument against prohibiting symbols is the importance of their use in education, which is currently playing out in Tennessee after a school board voted to remove “Maus,” a graphic novel about the Holocaust that depicts Jews as mice and Nazis as cats, from its eighth-grade curriculum. The resulting furor led to the book enjoying a huge spike in sales and galvanized some Jewish groups to defend it.

There are some who defend the swastika as an ancient symbol used by many cultures for millennia before it was turned into a symbol of hate by the Nazis.

Richard Marceau, with the Centre for Israel and Jewish Affairs, said any legislation on hate symbols must be mindful of the swastika’s different significance to Hindus, Buddhists, Jains and Zoroastrians, while also recognizing it can be used as a convenient excuse.

“There’s a certain level of common sense that should be used ... If you’re in a demonstration and you’re flying a swastika, unless it’s a Buddhist or Hindu march, the signal you’re sending is ‘I hate Jews,’” Marceau said.

Germany, which criminalizes public display of Nazi flags and Holocaust denial, has an exception for educational and artistic purposes.

MEET THE CRIMINAL THRESHOLD, ADAMS NOTED. PROVINCIAL HUMAN RIGHTS
tribunals. While there's no criminal sanction, there's still value in the state unequivocally condemning hate.

The free and open ability to express controversial views is a “key underpinning of our democracy,” Adams said — but he acknowledged that symbols of hate can cause real harm to those they target.

“Some of what people are going to say and do are going to be upsetting, hurtful, scary, and harmful to others ... when do you cross a threshold in which the speech and expression results in a degree of harm that justifies a state from prohibiting it?” Adams said.

“People always assume that their definition of harmful is going to be the one where the line is drawn,” he added. “And I think history shows that that's not always the case.”

While Farber supports strengthened legislation on hate crimes, especially in the online space, he believes all Canadians and all sectors of society have a role to play in fighting hate.

Antisemitism is the number one driver of police-reported hate crime in Canada. And while acts such spraying a swastika on a synagogue or waving a Nazi flag at a protest are condemned, antisemitism also manifests in subtler ways.

Farber pointed to a poll by the American Anti-Defamation League that found one-third of children between the fifth and 12th grade either believe that the Holocaust was exaggerated or never really happened.

He can only imagine what his father would think, or how Max would feel seeing a Nazi flag raised in Ottawa, where he operated a shop after moving to Canada.

“To him it would be unthinkable, in this country especially,” Farber said. “It would mean that people didn't learn the lessons of the past.”

*resistance group was operational when Max Tardif joined. A previous version
misstated that he helped start it.*



Omar Mosleh is an Toronto-based reporter for the Star. Follow him on Twitter:
@OmarMosleh.

REPORT AN ERROR

JOURNALISTIC STANDARDS

ABOUT THE STAR

This is **Exhibit « D »** to the Affidavit of Bernie Farber, sworn remotely by Bernie Farber, stated as being located in the City of Toronto, Ontario, before me in the City of Ottawa, in the Province of Ontario, on May 31, 2024, in accordance with O. Reg 431/20, *Administering Oath or Declaration Remotely*.

A handwritten signature in black ink, appearing to read "Albert Bunt". The signature is written in a cursive style with a prominent horizontal stroke at the end.

A Commissioner of Oaths, etc.

This advertisement has not loaded yet, but your article continues below.



Local News

Honk if you love Jesus – Why so many Evangelical Christians have joined the 'Freedom Convoy'

Blair Crawford

Published Feb 11, 2022 • 9 minute read

10 Comments



Members of the Calgary-based Billy Graham "Rapid Response Team" circulated among the demonstrators offering prayers. PHOTO BY BLAIR CRAWFORD /Postmedia

Street preacher Solomon Ikhuwu arrived in Ottawa on the first day of the "Freedom Convoy" protest saying God called him to the capital to spread the Gospel.

STORY CONTINUES BELOW

This advertisement has not loaded yet, but your
article continues below.

Down Wellington Street at the “Meeting Tent” Christian evangelist Shannon Laurent slings muffins and coffee, helps a street person find a mask so he can ride the O-Train and praises the Lord.

“Five people a day get saved around here,” Laurent says, as one demonstrators drops off freshly filled propane tanks and another hands in a battered Bible she’s found.

“It’s incredible how God has worked. It’s so amazing.”



Shannon Laurent distributes muffins, scripture and prayer Wednesday from an evangelical meeting place on Wellington Street. Credit: Blair Crawford/Postmedia PHOTO BY BLAIR CRAWFORD /Postmedia

Confederate flags and swastikas among the demonstrators. At one point on Wellington Street you could get buttons with the yellow Star of David, honoring the plight of Jewish people in Nazi Germany to the unvaccinated.

Supporters of the demonstration say those reports have been overblown.

“I thought it was a peaceful protest,” Ikhuiwu said. “I thought it was very different than any other protest that I’ve been to. The media was twisting stories and making into something it wasn’t. When I arrived in Ottawa I was getting all sorts of messages about violence, about ANTIFA, and I thought, ‘Are you guys talking about the right protest? Because the one I’m in is different.’ It’s peaceful. It’s excited. There’s honking. Everyone is just having a blast.

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“I know this is being tagged as White nationalism, but I don’t think it’s true,” said Ikhuiwu, who is Black. “I’ve seen Sikhs, I’ve seen Chinese, I’ve seen brown people. It’s very diverse. I won’t say it’s in the thousands, but I have seen them.”

Bernie Farber has a very different view. The son of Holocaust survivors, Farber is chair of the Canadian Anti-Hate Network and former head of the Canadian Jewish Congress.

“I don’t feel welcome there. That’s not a place for us,” Farber said.

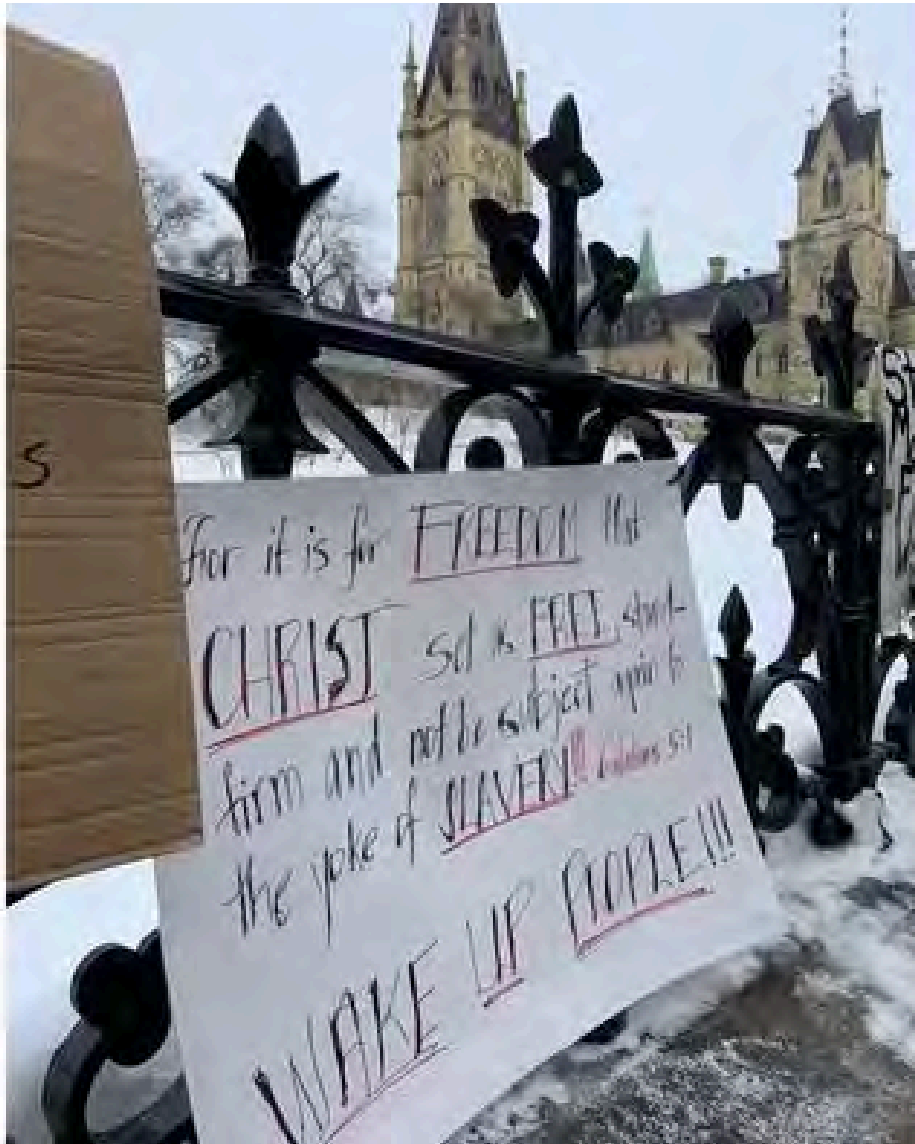
“The correlation between the yellow star and anti-vaxxers, as if it’s somehow equivalent to being rounded up, jammed into cattle cars, starved on a three-day journey, arriving at a death camp, picked for life or death, then thrown into a gas chamber where six million of your people are murdered,” he said.

“Evangelical Christians, who are supposed to be about acceptance and Christ’s love and peace, when they say, ‘Every faith should feel welcome,’ I can tell you that I wouldn’t set foot on Parliament Hill right now.”

The “Freedom Convoy” arrived in Ottawa on Jan. 28, a day before the fifth anniversary of the murder of six men at a Quebec City mosque by a killer who espoused hatred of Muslims. Gatineau’s Fareed Khan organized a candlelight vigil to mark the occasion that had to be cancelled because of security concerns.

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Posters with scripture and Christ references are a common sight on Parliament Hill. Credit: Blair Crawford/Postmedia PHOTO BY BLAIR CRAWFORD /Postmedia

“They will proclaim that it’s their right to freedom of expression and freedom of religion. And it is to some extent. But when your rights trample on my rights, my safety, my freedom of expression, my freedom to live safely — you know, people being accosted for wearing masks — that’s where your rights end. Your rights do not supersede my rights,” Khan said.

“I’m fed up with the pandemic. I’m dealing with mental health issues too as a result — as are millions of other Canadians. What I’m not doing is disrupting the lives of other people, destroying their ability to work and earn a living and I’m certainly not trying to disrupt the Canadian economy,” Khan said.

“The presence of faith communities (in the demonstration) is problematic and disturbing and it’s scarily reflective of what’s going on in the U.S.”

The Ottawa demonstration has drawn the attention of the U.S. right-wing and Christian media and Ottawa police report that much of the financial support of the “well-funded” demonstration has come from the U.S. A “Trump 2024” flag-waving protester rode through the streets on the first weekend of the demonstration and Trump signs and American flags are still on display.

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When GoFundMe shut down the \$9.8-million fundraising campaign, organizers quickly shifted to the American Christian fundraiser, GiveSendGo. However, the Ontario government moved to choke off funding to convoy protesters Thursday, successfully seeking a court order preventing anyone from using the millions of dollars raised for the convoy through GiveSendGo.

But Don Hutchinson, a former executive with the Evangelical Fellowship of Canada, said the Canada-U.S. link has been overblown.

“The first thing to note is that Canadian evangelicals are not American evangelicals,” said Hutchinson, who has studied voting trends among evangelical Christians.

“And the concerns that there’d be a Trumpian type invasion from evangelicals participating are vastly overstated. The two groups both originated in Great Britain but have grown in vastly different directions, separated by the 49th parallel.”

Even defining what makes an evangelical is difficult, but is generally accepted to involve four principles: strict adherence to the Bible; a focus on Christ’s crucifixion; a belief that people are in need of being saved through conversion; and activism. Evangelicals make up 8-12 per cent of the Canadian population or between 3-4.5 million people.

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Hutchinson said evangelicals have split on the issue of vaccines and COVID-19 measures, with some following Bible passages that say believers must gather together to worship, while others follow verses that urge obedience to the government.

Anger over anti-COVID-19 measures flared up last winter at the evangelical Grace Baptist Church in Edmonton when the minister, a former RCMP officer, refused government orders to cancel public gatherings. A similar clash over masking rules occurred in Aylmer, Ont., at the Church of God in 2020. The Church of God’s fire and brimstone preacher, Henry Hildebrandt, is in Ottawa

“A significant number of evangelical churches — the vast majority — have followed government guidelines in response to COVID-19 and have even hosted vaccination clinics,” Hutchinson said. “And then there’s a significant minority who’ve said ‘No. We shouldn’t forsake the assemblage of ourselves together.’

“Where those two camps have found a meeting ground is on the issue of freedom. As government measures have increasingly jeopardized people’s employment and their freedom to access restaurants and stores and things, combined with the mask vs. no mask issues.”

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Although evangelicals are strongly identified with Canada’s political right, that’s not always been so, he said. In the 60s and 70s, many supported the NDP because of its social justice platform. That shifted right with the arrival of the Reform Party under Preston Manning — himself an Evangelical Christian. The tilt right grew stronger under Stephen Harper’s Conservatives and became a stampede with Prime Minister Justin Trudeau’s strong stance on abortion rights.

“There was a feeling in many in the church that Mr. Trudeau was targeting Christians,” Hutchinson said.

Malloy finds the alliance between coarse and aggressive truckers and evangelicals a curious one.

“The people downtown, even if they’re not religious themselves, there’s a certain strong respect for religion,” he said. “The way I’ve heard social conservatives described is that they don’t necessarily go to church, but they think it would be a good idea if everyone else went to church.”

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It was a nod to religion that made organizers impose a Sunday morning ban on horn blowing before a court injunction silenced the horns by law.

“They even said it was for ‘The Lord’s Day,’” Malloy said. “The Lord’s Day? Who says that’s anymore? It’s pretty archaic language.”

Malloy also said that mainstream Canadian evangelicals take pains to distance themselves from their American counterparts.

“The small more radical group is pretty open to American influence and cross border stuff. But the more mainstream groups are very sensitive about American influence and they’re very careful to emphasize their Canadian roots, their Canadian money.”

On the ground, that’s sometimes hard to see. The appearance of the Billy Graham Rapid Response Team, though based in Calgary, is part of the vast American evangelical network.

Team manager Merle Doherty, said the team helped provide disaster relief during last month’s flooding in B.C. Fraser Valley and also attended the 2,000-strong anti-mask rally at the Church of God in Aylmer, Ont.



Merle Doherty, manager of the Calgary-based Billy Graham "Rapid Response Team" photographed on Parliament Hill. Credit: Blair Crawford/Postmedia PHOTO BY BLAIR CRAWFORD /Postmedia

"We bring that peace. There's a peace in Christ and we bring that wherever we go," Doherty said.

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"We never take a leadership position — or even take a position. We are so far under the radar, we don't make waves. We're just here to pray for people."

And in the "Meeting Tent" near the west side of Parliament Hill, Shannon Laurent says her group is doing its best to keep the demonstration calm and peaceful.

"If somebody is being rowdy, we go over and make sure they're not bothering the police and they're not bothering the politicians. We minister to them," she said.

"Our area, we don't get the rowdies, the music, the drugs, the alcohol. The odd person might bring alcohol, but it's not the same here as in the other areas. People keep coming back to us because the atmosphere is very different. It's very loving. We're all Christian."

But she doesn't condone the obscene language used by some of the protesters.

"With the language, we go over and say 'Look. We're here to keep the peace. We get them to calm down. We tell them yelling and screaming like that, it's just going to get the media to lie. Then they understand."

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Solomon Ikhuiwu says he'll be back in Ottawa this weekend to minister to the multitudes through his street preaching.

"Obviously, with a protest this big, there will be a few people in disagreement. Or maybe you have one person who's drunk and misbehaving and then the story gets made saying that everyone is like that."

Ikhuiwu says he's attended a Black Lives Matters protest as well, but won't compare it to his experience at the "Freedom Convoy."

"As a Black male, I've been a victim of racism too. But does that mean every person is racist? No. It doesn't mean I have to treat every white person as a racist," he said.

"I prefer not to compare. It's like comparing chicken and steak. Each had its own mission and its own cause. With BLM they're saying no to racism. This protest, they're saying, 'We want freedom.' I like to think the heartbeat of both groups is good intention and good motives."

Fareed Khan likens the "Freedom Convoy" to sedition. He hasn't gone to see the scene, but it's not out of fear.

"It's not about being uncomfortable. I am a racialized person, but I don't stand out as much as a Black person or a Muslim woman in a hijab. The reason I haven't gone down there is that I don't want to be exposed to the toxicity," he said.

"I don't know why (faith communities) would go there unless it was to be with the far-right and against Justin Trudeau. Their hatred for Trudeau is almost pathological," he said.

Khan says he knows Muslims have attended the demonstration, but he can't understand why.

"If he (the Prophet) were alive today he'd be telling people to get vaccinated for the common good," Khan said. "Better to pray at home. God will still hear your prayers."



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EDWARD CORNELL et al.
Plaintiffs

-and-

JUSTIN TRUDEAU et al.
Defendants

Court File No.: CV-24-94733

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Proceeding commenced at Ottawa

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Plaintiffs

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