

*My copy re Kemgni (ce)*

# REQUEST

To: Justice of the Peace, 161 Elgin Street, Ottawa, Ontario K2P 2K1

From: Deirdre Moore, CFA, BBA—President SAQOTU Inc.

Re: **Commencing a proceeding for a private information under the criminal code of Canada**

Date: July 11, 2019

---

Please find attached the required form, appendix and exhibits that support my request.

Executive Summary

DR. PAULE KEMGNI is a psychiatrist who works from the Suroit Hospital in Valleyfield, Quebec.

Between March 22-April 15, 2019 she committed the following crimes:

- a) Disobeying order of court
- b) Defamatory Libel
- c) Party to Offense
- d) (possibly) Fraud

*"Her position in society allows her to seal the fate of those who enter her domain and it is for this reason that her crimes are particularly heinous."*

Deirdre Moore, Ottawa, Ontario  
(in consideration of Dr. Paule Kemgni's crimes against humanity)

Table of Contents

Particulars .....	2
Witness Information .....	3
DISOBEYING ORDER OF COURT .....	5
DEFAMATORY LIBEL .....	7
FRAUD .....	10
PARTY TO OFFENSE .....	14
LIST OF EXHIBITS .....	18

*Lozer/31*

Private Information form for accused: DR. PAULE KEMGNI

PLEASE READ THE FOLLOWING PRIOR TO COMPLETING THE ATTACHED DOCUMENT.

Justices of the Peace are prohibited from giving any advice about your rights, nor can they give you any other type of legal advice, opinion or guidance. If you are seeking a legal opinion or require guidance about this process, you should seek out a lawyer or legal clinic. Please note that when you lay an Information, you have the same rights and obligations as any enforcement agency and must follow the same procedure and meet the same test for issuing process.

ONCE THE ATTACHED DOCUMENT IS COMPLETE, PLEASE RETURN TO THE COURT OFFICE SERVICE COUNTER WHERE YOU WILL RECEIVE FURTHER INSTRUCTIONS ABOUT THE NEXT STEP IN THIS PROCEDURE.

IMPORTANT: THIS DOCUMENT MUST BE COMPLETED IN FULL AND LEGIBLE IN ORDER FOR ANY INFORMATION(S) TO BE PROPERLY PREPARED FOR SIGNATURE.

COMMENCING A PROCEEDING FOR A PRIVATE INFORMATION UNDER THE CRIMINAL CODE OF CANADA

As a citizen, you have the right to appear before a Justice of the Peace to lay charges against another person by swearing to an Information. A Justice of the Peace must receive the Information if it meets the statutory provisions of the Criminal Code of Canada.

Upon your swearing on oath to the Information outlining the charge(s), the Criminal Code of Canada requires that the Justice of the Peace refer the matter to a Provincial Court Judge or a designated Justice of the Peace to consider whether to issue a summons or warrant to bring the person charged before the court.

By law, the Provincial Court Judge or designated Justice of the Peace may only issue a summons or a warrant if they have heard and considered the allegations of the Informant and evidence of witnesses. Also the Provincial Court Judge or designated Justice of the Peace must be satisfied that the Attorney General has received a copy of the Information and has been given reasonable notice of the hearing and an opportunity to attend the hearing to cross-examine and call witnesses and present any relevant evidence at the hearing. The hearing will not occur at the time the Information is sworn.

If the Provincial Court Judge or designated Justice of the Peace decides there are grounds to do so, a summons or, more rarely, an arrest warrant, may be issued for the accused person to compel him or her to attend in court to answer to the charge(s). The Provincial Court Judge or designated Justice of the Peace is not required to issue any form of process to bring someone to court if they are not satisfied the allegations set forth in the evidence presented at the hearing support the charge(s).

NOTE: This Information sheet has been prepared to provide a simple introduction to the requirements under the Criminal Code for an Individual to lay a charge against another person. If you wish further advice on how the law applies in your matter, you should seek legal counsel.

I have read and understand this document.

Deirdre Moore
Signature of Informant

July 12, 2019
Date

31

Private Information form for accused: DR. PAULE KEMGNI

ONTARIO COURT OF JUSTICE

Particulars

Part I: Allegations

**Name of Informant** Deirdre Moore  
**Date of Birth** 28-SEP-65  
**Address** Homeless, previous address was 1466 Claymor Avenue  
**City/Town** Ottawa, Ontario **Postal Code** K2C 1S6  
**Telephone** (915) 307-1390

**Name(s) of Alleged Accused** Dr. Paule Kemgni  
**Address** 150, rue St-Thomas  
**City/Town** Valleyfield, Quebec **Postal Code** J6T 6C1  
**Telephone** (581) 371-1257 **Date of Birth** unknown

**Relationship of the Alleged Accused to the Informant or Victim: (i.e. spouse, neighbour, etc.)**  
 Dr. Kemgni was "mandated" to fulfill the court order that requested an independent psychiatric assessment of me.

Particulars of Offences

**Date:** March 22 to April 15, 2019

**Location:** Valleyfield Quebec

**I will say:** Dr. Paule Kemgni has committed multiple crimes:

- Disobeying order of court (S. 127(1) of the Criminal Code)
- Defamatory Libel (S. 298, 300, 301 of the Criminal Code)
- (possibly) Fraud (S. 380(1) of the Criminal Code)
- Party to offense (S. 21(1) of the Criminal Code)

(Please provide sufficient details for the office to permit an information to be drafted.)

Please see attached Appendix to this Information Form

Private Information form for accused: DR. PAULE KEMGNI  
Witness Information

Name	Address	Phone Number
Hon. Joey Dubois	Palais de justice de Salaberry-de-Valleyfield	unknown
Me Patrick Cardinal	74, rue Académie Salaberry-de-Valleyfield, Québec	(450) 370-4000
Caroline Hébert-McKenzie	J6T 0B8	(450) 370-4000 ext. 63591

Please see extensive witness list that was included in Private Information form couriered on July 10, 2019 to the Justice of the Peace at 161 Elgin Street in Ottawa regarding accused CAS employee Mohammed Said. (attached as exhibit G)

Have the police investigated this incident?  No  Yes Incident/Occurrence # \_\_\_\_\_

Have you previously sworn an Information/filed a statement of allegation regarding this matter?  No  Yes

If yes, When? \_\_\_\_\_ Where? \_\_\_\_\_

Has another Justice of the Peace refused to issue process for this offence?  No  Yes

If yes, When? \_\_\_\_\_ Where? \_\_\_\_\_

Do you have any new evidence with respect to this offence?  No  Yes

If yes, give details On June 2, 2019, Dr. Kemgni sent to me an e-mail that contained further evidence of her willingness to continue to commit defamatory libel and party to offense. Furthermore, I believe that her actions in their entirety constitute assault and uttering threats as her report is being sought out by my ex-husband's lawyer, Wade Smith.

Paule Kemgni Signature of Informant July 12, 2019 Date

Identification of informant confirmed by Justice of the Peace.  
(Please see attached copy of my passport, certified by a Notary Public, in exhibit H.)

31

Private Information form for accused: DR. PAULE KEMGNI

Part II: Directions to Court Staff (to be completed by Justice of the Peace)

Please prepare an Information for a Private Prosecution by the Informant named above, Charging the accused person named above, with the offence(s) of:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

against \_\_\_\_\_ committed in the City/Town of \_\_\_\_\_

\_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_ 20 .

contrary to section: \_\_\_\_\_ of the \_\_\_\_\_ .

\_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_ 20 .

contrary to section: \_\_\_\_\_ of the \_\_\_\_\_ .

\_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_ 20 .

contrary to section: \_\_\_\_\_ of the \_\_\_\_\_ .

\_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_ 20 .

contrary to section: \_\_\_\_\_ of the \_\_\_\_\_ .

\_\_\_\_\_  
Signature of Justice of the Peace

\_\_\_\_\_  
Date

Part III: Directions to Court Staff (to be completed by Justice of the Peace)

Information to be laid pursuant to s. 810 of the *Criminal Code of Canada*.

Upon completion, return these documents to a clerk at the Criminal Court Service Area of the Ontario Court of Justice who will arrange for you to see a Justice of the Peace as soon as possible. If this form and statement are not complete, it may result in process not being issued on the charge(s).

Process Issued

Information Declined

\_\_\_\_\_  
Signature of Justice of the Peace

\_\_\_\_\_  
Date

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

**DISOBEYING ORDER OF COURT**

Section 127(1) of the Criminal Code states that:

Every one who, without lawful excuse, disobeys a lawful order made by a court of justice or by a person or body of persons authorized by any Act to make or give the order, other than an order for the payment of money, is, unless a punishment or other mode of proceeding is expressly provided by law, guilty of

- (a) an indictable offence and liable to imprisonment for a term not exceeding two years; or
- (b) an offence punishable on summary conviction.

**Allegation:**

Dr. Paule Kemgni disobeyed the order made by Hon. Joey Dubois in March 2019 and, therefore, broke the law. Specifically, she broke section 127(1) of the Criminal Code of Canada.

**I swear the following to be true:**

Instead of assessing my mental health and preparing an independent psychiatric assessment, Dr. Kemgni:

1. Intentionally detained me at the Suroit Hospital for 21 days (longer than the 20 days that Hon. Joey Dubois verbally ordered) so that I would miss a scheduled court date in Ottawa (where I could present evidence against my ex-husband and the Children's Aid Society),
2. Ignored me for most of the period detained and refused to review the evidence that I had against my ex-husband and
3. Prepared a report that was based entirely upon the testimony of my ex-husband and his sister, Mary Kiska.

**Evidence:**

1. Avis d'intention de produire un rapport d'expertise from Me Patrick Cardinal, Procureur aux poursuites criminelles et pénales (see exhibit A)
2. Dr. Kemgni's e-mail of June 3, 2019 with attachment (1-page defamatory, threatening letter) (see exhibit B)

Page 5 of 19

31

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

3. Multiple memos written to the "quality assurance" department for the Suroit Hospital that were:
  - hand-delivered to the Director (?Sylvie?),
  - dictated to Quebec Provincial Police staff voicemail and
  - dictated to Ottawa Police Services.
4. Phone records, court transcripts, video recordings

**Other Witnesses:**

Nursing and administrative staff at the Suroit Hospital.

Quebec Police Sergeant on whose voicemail my dictations were left.

Ottawa Police Services staff who noted my dictation as I read the memos.

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

**DEFAMATORY LIBEL**

Section 298 of the Criminal Code states that:

(1) A defamatory libel is matter published, without lawful justification or excuse, that is likely to injure the reputation of any person by exposing him to hatred, contempt or ridicule, or that is designed to insult the person of or concerning whom it is published.

(2) A defamatory libel may be expressed directly or by insinuation or irony

(a) in words legibly marked on any substance; or

(b) by any object signifying a defamatory libel otherwise than by words. R.S., c. C-34, s.

262.

Section 298 of the Criminal Code states that:

A person publishes a libel when he

(a) exhibits it in public;

(b) causes it to be read or seen; or

(c) shows or delivers it, or causes it to be shown or delivered, with intent that it should be read or seen by any person other than the person whom it defames. R.S., 1985, c. C-46, s. 299; 2018, c. 29, s. 31.

**Punishment of libel known to be false**

Section 300 of the Criminal Code states that:

Every one who publishes a defamatory libel that he knows is false is guilty of an indictable offence and liable to imprisonment for a term not exceeding five years. R.S., c. C-34, s. 264.

**Punishment for defamatory libel**

Section 301 of the Criminal Code states that:

Every one who publishes a defamatory libel is guilty of an indictable offence and liable to imprisonment for a term not exceeding two years.

**Allegation:**

Dr. Kemgni published libel that was known to be false and defamatory libel; her conscious actions even more reprehensible as her libel was to be relied upon by a court of law to determine my future. Because of Dr. Kemgni's libel, Hon. Joey Dubois believed that my best course of action might be to plead "not criminally responsible" when, in fact, I was not guilty of

31



Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

committing any crime (and acquitted over six weeks following my wrongful arrest, and persistent prosecution by Crown attorney Me Patrick Cardinal).

She broke the law. Specifically, she broke sections 298, 300 and 301 of the Criminal Code of Canada.

**I swear the following to be true:**

Instead of assessing my mental health and preparing an independent psychiatric assessment,

Dr. Kemgni:

1. Discounted my allegations against my husband,
2. Ignored the evidence that I presented to her,
3. Refused to access evidence that was publicly available in FC-15-2446-0 and FC-19-CP-000008,
4. Ignored me for most of the period detained,
5. Prepared a report that was based entirely upon the testimony of my ex-husband and his sister, Mary Kiska and
6. Believed that her documentation would be considered by a judge in a criminal court of law who would determine my future.

**Evidence:**

1. Avis d'intention de produire un rapport d'expertise from Me Patrick Cardinal, Procureur aux poursuites criminelles et pénales (see exhibit A)
2. Dr. Kemgni's e-mail of June 3, 2019 with attachment (1-page defamatory, threatening letter) (see exhibit B)
3. Multiple memos written to the "quality assurance" department for the Suroit Hospital that were:
  - a. hand-delivered to the Director (?Sylvie?),
  - b. dictated to Quebec Provincial Police staff voicemail and
  - c. dictated to Ottawa Police Services
4. Phone records, Court transcripts, video recordings

Page 8 of 19

31

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

**Other Witnesses:**

Nursing and administrative staff at the Suroit Hospital

Caroline Hébert-McKenzie

Me Patrick Cardinal

Hon. Joey Dubois

Page 9 of 19

31

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

## FRAUD

Section 380(1) of the Criminal Code states that:

Every one who, by deceit, falsehood or other fraudulent means, whether or not it is a false pretence within the meaning of this Act, defrauds the public or any person, whether ascertained or not, of any property, money or valuable security or any service,

(a) is guilty of an indictable offence and liable to a term of imprisonment not exceeding fourteen years, where the subject-matter of the offence is a testamentary instrument or the value of the subject-matter of the offence exceeds five thousand dollars; or

(b) is guilty

(i) of an indictable offence and is liable to imprisonment for a term not exceeding two years, or

(ii) of an offence punishable on summary conviction,

where the value of the subject-matter of the offence does not exceed five thousand dollars.

Marginal note:

Minimum punishment

(1.1) When a person is prosecuted on indictment and convicted of one or more offences referred to in subsection (1), the court that imposes the sentence shall impose a minimum punishment of imprisonment for a term of two years if the total value of the subject-matter of the offences exceeds one million dollars.

### Allegations:

Dr. Paule Kemgni may have committed the crime of Fraud under section 380(1) of the Criminal Code of Canada because she either:

- a. forged my signature to receive payment from the Province of Ontario,
- b. chose to forego being paid for her "services" by the Province of Ontario for some reason or
- c. "forgot" to invoice the Province of Ontario for her "services".

Page 10 of 19

31

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

She may have broken the law. Specifically, she may have broken section 127(1) of the Criminal Code of Canada.

Page 11 of 19

31

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

**I swear the following to be true:**

1. On or about March 22, 2019, Dr. Kemgni advised me that I must sign some forms so that she could be paid by the Province of Ontario.
2. On or about March 22, 2019, I was presented with three blank forms by an employee of the Suroit Hospital who asked that I sign them.
3. Without my glasses, I could not read the form that was written in French; however, I signed one.
4. As began to sign the second one, I realized that it was a blank form and stopped.
5. I decided that signing a blank form for Dr. Kemgni would be akin to signing a "blank cheque" drawn on the bank account of the Province of Ontario.
6. I refused to sign the forms until they were completed and, as I recall, I "scratched out" my signature from the first form.

**Evidence:**

1. Avis d'intention de produire un rapport d'expertise from Me Patrick Cardinal, Procureur aux poursuites criminelles et pénales (see exhibit A)
2. Dr. Kemgni's e-mail of June 3, 2019 with attachment (1-page defamatory, threatening letter) (see exhibit B)
3. Multiple memos written to the "quality assurance" department for the Suroit Hospital that were:
  - a. hand-delivered to the Director (?Sylvie?),
  - b. dictated to Quebec Provincial Police staff voicemail and
  - c. dictated to Ottawa Police Services
4. Phone records, Court transcripts, video recordings
5. My e-mail to Dr. Kemgni dated July 11, 2019 to which I have yet to receive a reply. (see exhibit C)
6. Any invoice that was submitted to and/or cheque paid by the Province of Ontario regarding my hospitalization in Quebec.

Page 12 of 19

31

Appendix to Private Information Form for Accused: DR. PAULE KEMGNJ

**Other Witnesses:**

Suroit Hospital employee who attempted to attain my signature on the blank forms: name unknown.

Province of Ontario staff who manage payments to physicians who provide services in Quebec.

Page 13 of 19

31

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

PARTY TO OFFENSE

Section 21(1) of the Criminal Code states that:

Every one is a party to an offence who (a) actually commits it; (b) does or omits to do anything for the purpose of aiding any person to commit it; or (c) abets any person in committing it. (2) Where two or more persons form an intention in common to carry out an unlawful purpose and to assist each other therein and any one of them, in carrying out the common purpose, commits an offence, each of them who knew or ought to have known that the commission of the offence would be a probable consequence of carrying out the common purpose is a party to that offence.

**Allegations:**

Dr. Paule Kemgni has committed the crime of party to offense under section 21(1) of the Criminal Code because she has both "done things" and "omitted to do anything" for the purpose of aiding **Jonathan Kiska and Wade Smith** in:

- Committing the crime of **Defamatory libel** under sections 298, 300 and 301 of the Criminal Code against me,
- Committing the crime of **Fraud** under section 380 of the Criminal Code against me,
- Committing the crime of **Criminal harassment** under section 264(1) of the Criminal Code against me,
- Committing the crime of **Assault** under sections 264.1(1) and 265(1) of the Criminal Code against me and
- Committing the crime of **Mischief** under section 430 of the Criminal Code against me.

She broke the law. Specifically, she broke section 21(1) of the Criminal Code of Canada.

Page 14 of 19

31

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

In addition, I believe that Dr. Paule Kemgni has committed the crime of party to offense under section 21(1) of the Criminal Code because she has both "done things" and "omitted to do anything" for the purpose of aiding employees of the **Children's Aid Society of Ottawa** (First Private Information form re: Mohammed Said is attached) to:

- Committing the crime of **Disobeying a statute** under sections 126(1) of the Criminal Code against me and continuing to abuse my children and me,
- Committing the crime of **Defamatory libel** under sections 298, 300 and 301 of the Criminal Code against me,
- Committing the crime of **Fraud** under section 380 of the Criminal Code against me,
- Committing the crime of **Criminal harassment** under section 264(1) of the Criminal Code against me,
- Committing the crime of **Assault** under sections 264.1(1) and 265(1) of the Criminal Code against me and
- Committing the crime of **Mischief** under section 430 of the Criminal Code against me.

In addition, I believe that Dr. Paule Kemgni has committed the crime of party to offense under section 21(1) of the Criminal Code because she has both "done things" and "omitted to do anything" for the purpose of aiding **Lamah El-Rayes and Diego Fernandez-Stolls** (Private Information form currently being prepared) in:

- Committing the crime of **Defamatory libel** under sections 298, 300 and 301 of the Criminal Code against me,
- Committing the crime of **Fraud** under section 380 of the Criminal Code against me,
- Committing the crime of **Criminal harassment** under section 264(1) of the Criminal Code against me,
- Committing the crime of **Assault** under sections 264.1(1) and 265(1) of the Criminal Code against me and
- Committing the crime of **Mischief** under section 430 of the Criminal Code against me.

Page 15 of 19

31



Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

**I swear the following to be true:**

In March and April 2019, despite my attempts to co-operate with Dr. Kemgni, she:

1. Discounted my allegations against my husband,
2. Ignored the evidence that I presented to her,
3. Refused to access evidence that was publicly available in FC-15-2446-0 and FC-19-CP-000008,
4. Ignored me for most of the period detained,
5. Prepared a report that was based entirely upon the testimony of my ex-husband and his sister, Mary Kiska and
6. Believed that her documentation would be considered by a judge in a criminal court of law.

She produced the report described in pages 2-3 under the heading "Defamatory Libel". (On July 11, 2019, my ex-husband's lawyer has threatened to bring a motion so that he can receive a copy of this report which he will likely use against me as "evidence" of my incapacity to be a mother, stand trial, etc.

Because of my extended detention by Dr. Kemgni:

- I was evicted from my temporary rental property
- A permanent restraining order was granted against me
- I am only permitted to visit my children at the office of the Children's Aid Society of Ottawa ("CAS")
- The CAS delays my visits, arbitrarily cancels them and is considering to refuse them in the first place.

**Evidence:**

1. Avis d'intention de produire un rapport d'expertise from Me Patrick Cardinal, Procureur aux poursuites criminelles et pénales (see exhibit A)
2. Dr. Kemgni's e-mail of June 3, 2019 with attachment: a 1-page defamatory, threatening letter (see exhibit B)

Page 16 of 19

21

Appendix to Private Information Form for Accused: DR. PAULE KEMGNI

3. Multiple memos written to the "quality assurance" department for the Suroit Hospital that were:
  - a. hand-delivered to the Director (?Sylvie?),
  - b. dictated to Quebec Provincial Police staff voicemail and
  - c. dictated to Ottawa Police Services
4. Phone records, Court transcripts, video recordings
5. Courthouse files FC-15-2446-0 and FC-19-CP000008
6. "Respondent's Documents Due December 31, 2018", a document authored by Deirdre Moore, served on Wade Smith of BellBaker LLP and filed at the Ottawa Courthouse (as per the endorsement of The Honourable Justice Engelking dated October 17, 2018)
7. E-mail thread ending July 11, 2019 1:40 PM (Subject: RE: Question regarding witnesses >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario) (see exhibit D)
8. E-mail thread ending June 24, 2019 1:59 PM (REAL ESTATE SCAM: A civil action against the both of you, hopefully by Mr. Kaldoon Habib Allah and myself) (see exhibit E)
9. E-mail thread containing May 15, 2019 12:36 PM (From: John Kiska, Subject: Re: My plans for May 27-31) (see exhibit F)
10. Private Information form regarding crimes committed by CAS employee Mohammed Said. (see exhibit F)
11. Private Information form regarding crimes committed by CAS employees: Jenn Campbell, Isabelle Guindon, Tara MacDougall and Bonnie Stafford (currently being prepared).

**Other Witnesses:**

Nursing and administrative staff at the Suroit Hospital.

Quebec Police Sergeant on whose voicemail my dictations were left.

Ottawa Police Services staff who noted my dictation as I read the memos.

Nursing and administrative staff at the Suroit Hospital

Page 17 of 19

31

LIST OF EXHIBITS A-H

- Exhibit A Avis d'intention de produire un rapport d'expertise from Me Patrick Cardinal, Procureur aux poursuites criminelles et pénales (13 pages)
- Exhibit B Dr. Kemgni's e-mail of June 3, 2019 with attachment: a 1-page defamatory, threatening letter (2 pages)
- Exhibit C My e-mail to Dr. Kemgni dated July 11, 2019 to which I have yet to receive a reply. (2 pages)
- Exhibit D E-mail thread ending July 11, 2019 1:40 PM (Subject: RE: Question regarding witnesses >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario) (5 pages)
- Exhibit E E-mail thread ending June 24, 2019 1:59 PM (REAL ESTATE SCAM: A civil action against the both of you, hopefully by Mr. Kaldoon Habib Allah and myself) (7 pages)
- Exhibit F E-mail thread containing May 15, 2019 12:36 PM (From: John Kiska, Subject: Re: My plans for May 27-31) (2 pages)
- Exhibit G Private Information form regarding crimes committed by CAS employee Mohammed Said—witness list (1 page)
- Exhibit H Copy of Deirdre Moore's passport, certified by a Notary Public (2 pages)

31

## Exhibit A

This page is intentionally "blank."

The 13-page document that includes Dr. Paula Kemgri's psychiatric assessment of Deirdre Moore is my personal information.

It is available upon request with consent by me.

Deirdre Moore  
July 12, 2019

A 1/1  
/31

**dw.cceh@outlook.com**

---

**From:** Deirdre White <dw.cceh@icloud.com>  
**Sent:** Monday, June 3, 2019 3:10 PM  
**To:** Deirdre Moore  
**Subject:** Fwd: Your harassing communications  
**Attachments:** Letter Ms Moore.docx

Forwarded from my iPhone

Sent from my iPhone

Begin forwarded message:

**From:** Paule Kemgni <[REDACTED]>  
**Date:** June 2, 2019 at 12:11:50 PM PDT  
**To:** "dw.cceh@icloud.com" <dw.cceh@icloud.com>, "deirdre.faff@gmail.com" <deirdre.faff@gmail.com>  
**Subject:** Your harassing communications

Madam Moore,

Please take note of the attached file.

Sincerely,

Dr. Paule Kemgni

Jun 3 2019

By Email (dw.cceh@icloud.com; deirdre.faff@gmail.com)

**Without Prejudice**

Madam Deirdre Moore

**Re : Your harassing communications**

Dear Ms. Moore,

This letter constitutes a formal notice to immediately cease sending correspondence to my personal email address. Over the last month, I have been receiving multiple harassing, threatening and confused email communications from you. I never provided you with my email address and hereby request that you cease contacting me this way. Your behaviour is inappropriate and will not be further tolerated.

In March 2019, I was mandated by the Court to perform an independent medical assessment of your psychiatric condition. I am not and never was your treating physician throughout your hospitalization at the Suroit Hospital in March and April 2019, or at any point in time. I strongly recommend that you contact your treating physicians and psychiatrist if you require medical assistance. Should you urgently need to consult a physician, you should present yourself at the Emergency Room at your nearest hospital.

Please note that I retained legal counsel from the law firm McCarthy Tétrault LLP, as regards your conduct and harassing communications. I will be assisted by legal counsel as of now, and will forward to them any communication I receive from you, from now onwards. Upon their suggestion, should you fail to comply with this formal notice, you may leave me no other choice but to report your behaviour to the police, for criminal harassment.

As recommended by my attorney, I would like to emphasize that I reserve all of my rights and remedies and that this letter is sent to you without prejudice and without admission of liability.

I trust that you will understand the seriousness of this warning letter and act accordingly.

Sincerely,

Dr. Paule Kemgri

B 2/2

31

**dw.cceh@outlook.com**

**From:** Deirdre Moore on behalf of /o=First Organization/ou=Exchange Administrative Group(FYDIBOHF23SPDLT)/cn=Recipients/cn=00037FFE20F75F01  
**Sent:** Thursday, July 11, 2019 7:19 PM  
**To:** 'Dr. Paule Kemgni'  
**Subject:** SECOND REQUEST >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario  
**Attachments:** 01. INFORMATION FORM - CAS, Accused Mohammed SAID 20190625.pdf; 02. APPENDIX TO INFORMATION FORM - Accused Mohammed SAID.pdf  
**Importance:** High

Please respond.

*Deirdre Moore, CFA, BBA*  
 Co-Founder  
 (915) 307-1390



Connect with me on [LinkedIn!](#)

Coming soon: An online presence for the company  
 Coming soon: View our **law suit templates** and **photo journalist adventures** by requesting to join our Dropbox community.

**From:** Deirdre Moore <dw.cceh@outlook.com>  
**Sent:** Thursday, July 11, 2019 10:41 AM  
**To:** Dr. Paule Kemgni <[REDACTED]>

**Subject:** Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

Dr. Kemgni,

As you know, you were mandated by the court to perform an independent medical assessment of my psychiatric condition. Instead, however, you chose to prepare a report based on statements from my ex-husband and his sister. I have enough evidence to support an Information Form regarding the criminal investigation of you (not too unlike attached documents for Mohammed Said) as well as a civil action seeking damages for defamation and the infliction of motional suffering.

*c 1/2*  
*31*

I intend to finalize my statement of claim over the next few days and if you intend its service to be on a lawyer instead of you personally then request that they send to me the required information.

Otherwise, you can expect personal service on you.

Please note that I have not decided yet whether or not I should use Rule of 76: the only reason that I am is my current financial situation.

In my view, a psychiatrist who lies to the court should be stripped of their ability to practice medicine and imprisoned, at a minimum. Pecuniary damages of \$50,000 is an insult to justice.

I look forward to your response.

PS. I never did sign any forms so that you could be paid by the Province of Ontario. (They were blank.) So,

- (a) If you have completed them, then feel free to forward them to me and I will sign them for you now, or
- (b) You already billed Ontario with a forged signature, or
- (c) You chose to forego billing for your "services".

Which is it Dr. Kemgni?

*Deirdre Moore, CFA, BBA*

Co-Founder  
(915) 307-1390



Connect with me on [LinkedIn!](#)

Coming soon: An online presence for the company

Coming soon: View our **law suit templates** and **photo journalist adventures** by requesting to join our Dropbox community.



**dw.cceh@outlook.com**

---

**From:** Microsoft Outlook <postmaster@outlook.com>  
**To:** dw.cceh@outlook.com  
**Sent:** Thursday, July 11, 2019 7:19 PM  
**Subject:** Delivered: SECOND REQUEST >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

**Your message has been delivered to the following recipients:**

[dw.cceh@outlook.com](mailto:dw.cceh@outlook.com)

Subject: SECOND REQUEST >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

31 C "+1"

**dw.cceh@outlook.com**

---

**From:** Deirdre Moore  
**Sent:** Thursday, July 11, 2019 1:40 PM  
**To:** Wade Smith  
**Cc:** Christine Hammond; [REDACTED]  
**Subject:** RE: Question regarding witnesses >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

Mr. Smith,

Are you refusing to provide a copy of the draft TSEF? Did you not keep a copy?

I am not obligated to provide you with my medical files, as you are aware. Your degree of un-cooperativeness (today) would be deemed harassment by many—especially when you so boldly claimed (see below) that my capacity will be in question.

Are you attempting to assess my capacity for recognizing crooked lawyers?

*Deirdre Moore, CFA, BBA*

Co-Founder  
(915) 307-1390



Connect with me on [LinkedIn!](#)

Coming soon: An online presence for the company  
Coming soon: View our **law suit templates** and **photo journalist adventures** by requesting to join our Dropbox community.

**From:** Wade Smith [REDACTED]  
**Sent:** Thursday, July 11, 2019 12:46 PM  
**To:** Deirdre Moore <dw.cceh@outlook.com>  
**Cc:** Christine Hammond [REDACTED]  
**Subject:** RE: Question regarding witnesses >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

Once I receive the requested report...

Wade L. Smith  
Jell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario

D 1/5  
31

K2P 0C2  
613-237-3448 (324)

**From:** Deirdre Moore [mailto:dw.cceh@outlook.com]

**Sent:** July-11-19 12:44 PM

**To:** Wade Smith

**Cc:** Christine Hammond; Bell Baker Info

**Subject:** RE: Question regarding witnesses >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

Kindly provide for me another copy of your draft TSEF today.

It is your capacity that will be in question Mr. Smith: accordingly, I will be requesting an order for an independent psychiatric assessment of you in my Private Information for the criminal investigation of you.

*Deirdre Moore, CFA, BBA*

Co-Founder  
(915) 307-1390



Connect with me on [LinkedIn!](#)

Coming soon: An online presence for the company

Coming soon: View our **law suit templates** and **photo journalist adventures** by requesting to join our Dropbox community.

**From:** Wade Smith [REDACTED]

**Sent:** Thursday, July 11, 2019 12:06 PM

**To:** Deirdre Moore <dw.cceh@outlook.com>

**Subject:** RE: Question regarding witnesses >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

You would provide this because it is relevant to the issue of your capacity, which will be a central issue moving forward. It would be helpful for me to have this prior to the August 9 date. If not, I will ask the court for an order for its production and costs.

As regards the TSEF, it's located at Tab 3 of the Updated Settlement Conference Brief which was served upon you on January 9, 2019.

Wade L. Smith  
Bell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2

D 2/5

31

613-237-3448 (324)

**From:** Deirdre Moore [mailto:dw.cceh@outlook.com]

**Sent:** July-11-19 11:40 AM

**To:** Wade Smith

**Subject:** RE: Question regarding witnesses >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

Why in the world would I do that?

Please provide me with your draft TSEF.

*Deirdre Moore, CFA, BBA*

Co-Founder

(915) 307-1390



Connect with me on [LinkedIn!](#)

Coming soon: An online presence for the company

Coming soon: View our **law suit templates** and **photo journalist adventures** by requesting to join our Dropbox community.

**From:** Wade Smith [REDACTED]

**Sent:** Thursday, July 11, 2019 11:34 AM

**To:** Deirdre Moore <dw.cceh@outlook.com>

**Cc:** John Kiska [REDACTED]

**Subject:** RE: Question regarding witnesses >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

Please provide me with a copy of Dr. Kemngi's report.

Wade L. Smith  
Bell Baker LLP  
700-116 Lisgar Street  
Ottawa, Ontario  
K2P 0C2  
613-237-3448 (324)

**From:** Deirdre Moore [mailto:dw.cceh@outlook.com]

**Sent:** July-11-19 10:47 AM

**To:** Wade Smith; Christine Hammond

**Cc:** Bell Baker Info; [REDACTED]

**Subject:** Question regarding witnesses >> FW: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

Wade,

3/5  
31

Were you hoping to use Dr. Kemgni as a witness?

Deirdre

From: Deirdre Moore

Sent: Thursday, July 11, 2019 10:41 AM

To: Dr. Paule Kemgni [REDACTED]

Cc: [REDACTED]

Subject: Contact Information for your lawyer: Civil Action; Question regarding fraudulent billings to Province of Ontario

Dr. Kemgni,

As you know, you were mandated by the court to perform an independent medical assessment of my psychiatric condition. Instead, however, you chose to prepare a report based on statements from my ex-husband and his sister. I have enough evidence to support an Information Form regarding the criminal investigation of you (not too unlike attached documents for Mohammed Said) as well as a civil action seeking damages for defamation and the infliction of emotional suffering.

I intend to finalize my statement of claim over the next few days and if you intend its service to be on a lawyer instead of you personally then request that they send to me the required information.

Otherwise, you can expect personal service on you.

Please note that I have not decided yet whether or not I should use Rule of 76: the only reason that I am is my current financial situation.

In my view, a psychiatrist who lies to the court should be stripped of their ability to practice medicine and imprisoned, at a minimum. Pecuniary damages of \$50,000 is an insult to justice.

I look forward to your response.

PS. I never did sign any forms so that you could be paid by the Province of Ontario. (They were blank.) So,

- a. If you have completed them, then feel free to forward them to me and I will sign them for you now, or
- b. You already billed Ontario with a forged signature, or
- c. You chose to forego billing for your "services".

Which is it Dr. Kemgni?

*Deirdre Moore, CFA, BBA*

Co-Founder

(915) 307-1390



D 4/5

31

Connect with me on [LinkedIn!](#)

Coming soon: An online presence for the company

Coming soon: View our **law suit templates** and **photo journalist adventures** by requesting to join our Dropbox community.