Introduction

1. File FC-19-CP000 003 that was opened by the Children's Aid Society of Ottawa ("CAS") has ignored the 11 volumes of continuing record FC-15-2446-0 which contains an abundance of evidence that Deirdre Moore's ex-husband, Jonathan Kiska ("KISKA") has been emotionally, psychologically and financially abusing her and her two children, Sean Kiska (age 13) and Cate Kiska (age 11) for over six years.

2. File FC-19-CP000 003 has also circumvented the results of a four-month investigation by Katherine Bobula of The Office of the Children's Lawyer ("OCL") that recommended sole custody to be awarded to Deirdre Moore ("MOORE")

3. The CAS has violated its own rules contained within the Child, Youth and Family Services Act ("CYFSA") by:
   - removing MOORE's children from her home without a warrant when they were not in danger
   - utilizing section 137 of the CYFSA to restrict MOORE's access to her children without serving on her the notice as was required.

4. The CAS has also violated the Family Law Rules and the Rules of Civil Procedure in order to swiftly deliver sole access and sole custody to KISKA.

see Video 1	https://youtu.be/URbDviCQhro	If available. (Other copies available from MOORE)
Video 2	" " / gØaXNnFsf4A	
Video 3	" " /wcfA141SAWo	

("SAID")

5. CAS Worker Mohamed Said has signed, yet another, Affidavit laden with false statements of fact, omissions of true facts and overall malicious obfuscation in order to defame MOORE.

6. Specifically, SAID has, while in possession of evidence to the contrary, alleged:
   - MOORE does not care for her children and/or has not made her children her priority
   - MOORE is mentally ill
   - MOORE is a criminal
   - MOORE was deemed "not criminally responsible" in a criminal proceeding
   - the children require protection from MOORE

7. All of SAID's allegations at paragraph 6 are provably false.

8. SAID is guilty of, at a minimum, defamatory libel which is the reason MOORE is seeking a criminal investigation of him as well as seeking damages from the CAS for, among other things, the intentional infliction of mental suffering and emotional harm.

9. SAID is also guilty of committing child abuse as per the CYFSA.

(Search online for cas-being-paid-my-ex-husband-abuse-children-me
to see video links to entire June 26, 2019 CAS encounter. This article on MOORE's LinkedIn profile became unavailable when someone "accessed" her account. Article available from MOORE & Facebook.)

Summary of Important Facts

10. In November 2017, Justice Darlene Summers granted MOORE permission to amend her Answer to seek damages against KISKA for:
    - multiple violations of Civil Law including, but not limited to, the intentional infliction of mental suffering and emotional harm and attempted parental alienation
    - multiple violations of the Criminal Code of Canada including, but not limited to, defamatory libel.

11. Justice Summers' decision, where she stated that MOORE's motion materials were "rife" with evidence, is publicly available at www.CanLii.org as Kiska v. Moore, 2017 ONSC 6872— a fact which has been made known to SAID and others at the CAS on numerous occasions.

12. In December 2018, Moore delivered to Justice Engelking, the CAS and others a legal document that included letters of support from psychologist Dr. Iris Jackson and Victims' support workers Jessica Poloz of the Eastern Ottawa Resource Centre and KhamenWood of Ottawa Victim Services.

13. On or about January 17, 2019, Justice Engelking added the Kiska v. Moore divorce trial to the September 23, 2019 trial list.

14. Within two weeks, SAID entered MOORE's home with three OPS police officers and, without a warrant, removed her children from her home and brought them to the matrimonial home of which KISKA still temporarily had sole possession.

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15. Note that interim sole possession of the matrimonial home by KISKA was a condition of the Interim Shared Parenting Agreement signed in December 2016: this agreement was effectively discontinued the evening that the shared parenting regime was arbitrarily ended by SAID and KISKA. He no longer has "sole possession" of that house.

16. Approximately one week following the unlawful apprehension of MOORE's children by SAID, an unlawful collection of motion materials was served on MOORE less than 24 hours before the actual motion was to be heard.

17. At the hearing on February 6, 2019, defamatory libel and slander was presented to Justice Parfett in order to grant "CARE" of the children to KISKA.

18. In addition, agent Brian Fisher ("FISHER") introduced a draft restraining order that utilized section 137 of the CYFSA that restricted Moore's access to her children to the discretion of the CAS and KISKA.

19. The restraining order noted at paragraph 18 was unlawful as it contravened s. 137 of the CYFSA.

20. The "discretions" noted at paragraph 18 effectively removed MOORE from her children's lives as KISKA refused to facilitate communication, the CAS ignored requests for visitations and/or arbitrarily cancelled visitations and the children's schools refused to accept tokens of love, such as flowers.

21. On February 27, 2019, allegations about MOORE's mental health and abilities as a mother again filled the court room and she was not permitted to be heard.

22. Given the restraining order in place, and her concerns over the escalating allegations from KISKA, SAID, FISHER and others against her which were — without any corroborating evidence whatsoever — being accepted as truthful by the court, she packed a suitcase and left Ottawa for her own safety until the next court appearance of March 14, 2019.

23. At approximately 4:00 a.m., on March 14, 2019, however, MOORE was arrested by Quebec Provincial Police and accused of committing the crime, "Flight from Peace Officer".

24. Though not guilty, she was detained and unable to attend the March 14 hearing in Ottawa where she was to defend herself and regain custody of and access to her children.

25. Aggressively, the Quebec Crown Prosecutor Patrick Cardinal insisted that not only MOORE be detained but that she be sent for an independent psychiatric assessment.

26. The psychiatric assessment noted at paragraph 25 was not to exceed 20 days so that a trial date could occur "soon".

27. MOORE was detained at the Sureté Hospital in Quebec by Dr. Paule Kengni ("KEMGNI") for 21 days: she missed another Ottawa court date. On April 8, 2019, MOORE was noted

in default (though she was forced to "attend by teleconference") of the proceedings where Justice MacLeod changed a temporary unlawful order into a permanent unlawful order.

28. Dr. Paule Kengni violated the court order of Judge Joey Dubois in two ways:

i/ she did not prepare an independent psychiatric evaluation: she phoned KISKA and his sister, Mary Kiska, and prepared a report solely based on their slanderous and/or libellous statements.

ii/ she detained Moore longer than the court-specified duration of 20 days, despite MOORE's efforts to alert her to that fact and the importance of April 9th, 2019.

29. Finally, on April 29, 2019, MOORE defended herself against Prosecutor Patrick Cardinal and she was found not guilty; yet, she was detained for 46 days and missed TWO family court hearings.

30. Aware that she could be accused of and/or arrested for anything in Ontario and Quebec, Moore went to the United States in order to "wait out" the four-month period when she would have another chance to defend herself in court.

31. Throughout May and June, she travelled and began to focus on how she would re-build her career with an eye toward the imprisonment of Kiska in September 2019, moving herself and her two children to the United States and continuing to work on the business model for her company SAQUTU Inc.

32. SAQUTU Inc. was accepted as an exhibitor at the American Psychiatric Association's 2019 Annual Meeting held in San Fransisco May 18 - 22.

33. There, MOORE made numerous connections as she introduced some of SAQUTU Inc.'s initiatives including raising awareness on "The Fragility of Mental Health when in an Abusive Relationship".

34. MOORE met psychiatrists from the United States as well as from Europe where healthcare funding models were similar to those in Canada.

35. Throughout May, MOORE also tried to speak to her children; however, KISKA would not answer the phone or ever let the children call.

36. The phones that MOORE had purchased (and purchased phone plans for) were apprehended by KISKA: when MOORE asked for them back, he refused to return them. (KISKA stole the two phones that MOORE bought for her children.)

37. Throughout June, MOORE's attempts to schedule a visit with her children were dodged and/or completely ignored by SAID and CAS worker Jenn Campbell ("CAMPBELL") until a pre-visit meeting was finally scheduled for June 19, 2019.

38. MOORE returned to Ottawa for that meeting where she recorded SAID admitting that he apprehended her children without a warrant.

39. On June 19, 2019, SAID also stated "there is no doubt that [MOORE is] a loving mother" and acknowledged that MOORE's children were not in imminent danger on the night of their apprehension.

40. MOORE attended the CAS Office for her supervised visit with her children on June 26, 2019.

41. CAS employees colluded with KISKA to orchestrate a "reason to cancel the visit"; namely that MOORE would record the event when she had no intention of doing so and stated as much, clearly.

42. MOORE's visit with her children was cancelled arbitrarily by CAMPBELL on June 26, 2019.

43. Before MOORE had the opportunity to ask to speak to a supervisor, CAMPBELL asked security to phone the police: MOORE was to be arrested for trespassing!

44. The following morning, June 27, 2019, MOORE became very concerned for her children's well-being. She went to check on them* and ended up being arrested for violating section 147(f) of the CYFSA; an offense which is technically impossible for her to commit as she is not an officer, director or employee of the CAS!

45. Moore was released on June 27, 2019 and she returned to the United States for safety the following day.

46. Noteworthy: On June 28, 2019, MOORE attended her 3-bedroom home to see if the rumours about her eviction were true: they were. All of her possessions were gone.

47. Throughout March to June, MOORE had requested the contact information for her landlord from the rental agent. She had EIGHT bank drafts prepared but neither the rental agent nor the paralegal would provide a number or e-mail address for the landlord. MOORE was unlawfully evicted between May and June, the contents of her home were removed and KISKA also texted to MOORE:

> "[I will be contacting Diego to buy the contents of your house... you own nothing.. sorry... not even the presents that you bought for Sean.]"

* As their mother, she has the fiduciary duty to care for her children — especially when she is aware of abuse!

48. Trying to survive, financially and otherwise, until the September divorce trial, MOORE travelled the U.S. by train and continued to work on her video-journalist portfolio that she began in Ottawa.

49. As she continued to be ignored by KISKA and assaulted by the CAS, MOORE began to prepare Private Information forms to seek the criminal investigation of:
- SAID
- KEMGNI
- those involved in the theft of approximately $500,000 in household contents and valuables
- and others

50. MOORE couriered the Information Forms to the Ottawa Courthouse and distributed copies of these and other materials to U.S. authorities.

51. Toward the middle of July, cognizant of the fact that she had to appear in court regarding the ridiculous charge of violating section 147(f) of the CYFSA, MOORE began to study the Act and review file FC-19-CP000008.

52. On or about July 15, 2019, MOORE realized that for a multitude of reasons, the April 8, 2019 order contained in FC-19-CP000008 was unlawful including, but not limited to, SAID's fraudulent Notice of Motion dated February 6, 2019.

53. Intent that her children know that she loves them and misses them, MOORE returned to Ottawa.

54. MOORE attended her matrimonial home and called for them as KISKA phoned the police.

55. MOORE delivered gifts for her children as KISKA phoned the police.

56. MOORE took pictures of the matrimonial home — because KISKA and his lawyer Wade Smith ("SMITH") refused to provide any pictures — as KISKA phoned the police.

57. By July 26, 2019 — her children not hearing her voice in nearly SIX MONTHS — MOORE could not bare it any longer: she attended the house so she could tell her children that she loved them and missed them.

58. KISKA phoned the police.

59. MOORE kicked in a small basement window of her matrimonial home and yelled "Sean! Cate! I love you! I miss you!"

60. Once she heard them leave, MOORE entered the home and wrote on the living room wall, "[I love you Sean and Cate. I miss you. Your dad is a liar and a bad man.]"

61. Moore saw some of the items that KISKA had stolen from her and thought about taking them but she chose not to.

62. Moore promptly left the matrimonial home where she was immediately arrested for:
- Break & Entry
- Partner Mischief
- Disobeying a Court Order

63. Obviously, Moore had no criminal intent and aggravating factors were severe.

64. The Crown Prosecutor, however, has insisted on her detention.

65. While detained in Quebec in March/April 2019, Moore missed two family court appearances, then found not guilty.

66. It would appear that Moore's August detention by yet another Crown Prosecutor will force her to:
- miss three family court appearances,
- prevent her from defending herself against a final and permanent order that gives sole custody and access to KISKA and
- delay a divorce trial for which she has waited four years.

67. MOORE's children are being emotionally and psychologically abused by SAID, CAMPBELL, CAS and KISKA. Others, like SMITH, are guilty of Party to Offense (s. 21(1) of the Criminal Code).

68. KISKA, in addition to the seemingly infinite counts of defamatory libel, committed fraud and denied MOORE and her children meaningful support and the fair sharing of expenses since December 2016.

69. Being a victim of KISKA's is no valid reason for CAS's Application.

70. MOORE requests that the CAS Applications be struck and that FC-19-CP 000008 be discontinued as an obvious abuse of process.

71. Once released, MOORE will seek leave to bring a Motion to change any remaining unlawful orders and/or appeal decisions made in the courts which have FACILITATED, at a minimum, child abuse and the persecution of MOORE.

72. On August 12, 2019, MOORE received an endorsement from Justice Tracey Engelking that stated, among other things, that MOORE's divorce was removed from the trial list.

73. All that was required to have the divorce removed from the trial list was a simple request from crooked lawyer of ex-husband.

Noteworthy: In June 2019, I served on SMITH, filed and hand-delivered a letter to Justice Audet (cc Engelking) to request leave to bring a Motion to change orders re: support & access. It was ignored!

74. Given,

- the fact stated at paragraph 12
- eleven volumes of evidence of KISKA's
  - defamatory libel
  - fraud
  - abuse

  and statements of support for MOORE
- the obvious unlawfulness of CYFSA file Fc-19-CP000008

How could,

- Justice Audet make some endorsement (on the Monday immediately following MOORE's Friday night arrest of July 26, 2019)
- Justice Engelking remove the divorce from the trial list and arbitrarily make a change to a support order?

75. It is difficult to discount the probability that it is not just the CAS who are guilty of violating S. 21(1) of the Criminal Code of Canada.

76. Note that Justice Engelking's endorsement stated that MOORE was incarcerated: she was not. MOORE was remanded by crooked Crown Prosecutor Pearce (?SP?) so that she would be prevented from attending her Family Court proceedings. Period.

77. Section 465 (1)(b) applies to many in this saga: divorcing a narcissist/psychopath in Ottawa is not a simple task.