ONTARIO

SUPERIOR COURT OF JUSTICE

B E T W E E N:

Deirdre Moore *plaintiff*

and

The Children's Aid Society of Ottawa *defendant*

STATEMENT OF CLAIM

TO THE DEFENDANT

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.

IF YOU PAY THE PLAINTIFF'S CLAIM, and $12,500.00 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and $400 for costs and have the costs assessed by the court.

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

Address of .....

Court Office .....

TO The Children's Aid Society of Ottawa, 1602 Telesat Court, Gloucester ON K1B 1B1

CLAIM

1. Plaintiff Deirdre Moore ("Andeé"), claims against the Defendant ("CAS"):

    a. Pecuniary damages in the amount of $10,000,000 due to its:

        i. breach of fiduciary duty, negligence and/or negligent investigation;

        ii. wilfull blindness and/or recklessness; and/or

        iii. intentional infliction of emotional suffering, negligent infliction of emotional suffering and/or assistance in breach of fiduciary duty

    of Andeé's children, Sean Charles Kiska and Cate Stella Kiska ("Sean & Cate");

    b. Pecuniary damages in the amount of $10,000,000 (less any amount awarded as damages described at para. 1 a)) due to its:

        i. intrusion of seclusion, defamation, negligence and/or negligent investigation;

        ii. wilfull blindness and/or recklessness;

        iii. intentional infliction of emotional suffering, negligent infliction of emotional suffering; and/or

        iv. assistance in breach of fiduciary duty and/or breach of fiduciary duty

    of Andeé, a devoted mother of two and Ontario taxpayer;

    c. Compensatory damages in the amount of $10,000,000 (less any amount awarded as damages described at para. 1 a) and b)) for:

        i. breach of fiduciary duty, assistance in breach of fiduciary dute, negligence, negligent investigation, wilfull blindness and/or recklessness;

        ii. complicity to obstruction of justice, torture, trafficking in persons and/or terrorist activities and/or

        iii. abuse of taxpayer-funded status and/or public service agency

enabled, promoted and/or funded by the Province of Ontario;

d. Special damages in an amount to be determined with particulars provided prior to trial;

e. Pre- and post-judgement interest pursuant to ss. 128 and 129 of the Courts of Justice Act ("*CJA*"), R.S.O. 1990, c. C.43, as amended;

f. Costs of this action on a full indemnity basis; and

g. Such further and other relief as this Honourable Court deems just.

INTRODUCTION

2. The manner in which the CAS has de-frauded the Province of Ontario while relentlessly terrorizing Andeé, Sean & Cate for over 10 years is described below using the following structure:

	Heading	pages	Paras.
A.	Background	03 – 05	003 – 010
B.	20130301-20200228 Chronology of CAS-related torts and crimes (pre-Convid[1])	05 – 22	011 – 095
C.	20200301-20201109 Chronology of CAS-related torts and crimes pre-SCJ'S Family Court Summary Judgment Motion	23 – 28	096 – 116
D.	The 20201110 Summary Judgment Motion—the CAS knowingly asks the court to give Sean and Cate to the Abuser	28 – 29	117 – 125
E.	20201111-20211108 Chronology of CAS-related torts and crimes pre-SCJ's Divisional court denial of appeal	29 – 30	126 – 130
F.	The 20211109 Appeal—CAS ignores 1,000's of pages of evidence of severe domestic violence and child abuse+++	30	131 – 133
G.	Conclusion	31 – 33	134 – 146

[1] The court-enabled sociopaths in Ottawa don't realize that they're bottom feeders: provincial, federal and global agents are much more wicked.

A. BACKGROUND

3. The events leading **up to the 2013** involvement of the CAS in the lives of Andeé, Sean & Cate as described at para. 11 a. below, were:

    a. **I**gnored,

    b. **B**uried and/or

    c. **D**iscounted-to-a-value-of-zero

("IBD")'d[2] by multiple "agents", employees and/or volunteers of this taxpayer-funded, for-profit entity, as well as its Executive Director, Kelly Raymond ("Raymond").

4. After its entry into Andeé, Sean & Cate's lives on **20130301**, the recruitement of "services" available at:

    a. The Ottawa Hospital ("TOH"),

    b. the Royal Ottawa Mental Health Centre ("ROMHC")

    c. the Ottawa Police Services Board ("OPSB") and

elsewhere—in order to build Andeé's faux history of mental illness from **2013-2015** as described at paras. 11 b. to 29—must have been a pre-requisite for their eventual child and parental alienation plans; motivated by the City of Ottawa's need for broken bodies in order to keep its hooker, addict, inmate and cheap labour industries operating.

5. Its choice to remain wilfully blind in **2016** has now been well-documented: Andeé's ignored pleas for help now entering their ***eleventh*** year to the irreparable detriment of Sean & Cate.

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[2] From 2013 to 2021, the CAS's collective IBD evolved from, arguably, wilful blindness to negligence to malice to crimes including, but not limited to, violations of:

S. 300 Defamatory Libel,
S. 366 Forgery/Making False Document (directly and indirectly via S. 21(1) and/or S. 23(1)),
S. 134 Giving A False Sworn Statement,
S. 26(1) Disobey a Statute,
S. 139(3) Offence of Obstructing Justice
S. 269.1 Torture,
S. 279.01 Human Trafficking,
S. 83.19 Facilitating Terrorist Activity,
S. 380(1)(a) Fraud against the Province of Ontario and/or its taxpayers; and,
via S. 21(1) Parties to Offence and/or S. 23(1) Accessory After the Fact, S. 380(1)(a) Fraud against Andeé Jak

6. Evidence of the **2017-2018**, multi-faceted, severe domestic violence and child abuse by Kiska, that intensified following:
    a. Justice Darlene K. Summers' Kiska v. Moore, 2017 ONSC 6872 (CanLII) decision that permitted Andeé to seek damages for Kiska's crimes and torts and
    b. the 2018 report from Ontario's Office of the Children's Lawyer ("OCL") that recommended Andeé—***not*** Kiska—receive sole custody of them.

    as described at paras. 33-51 below was ***also*** IBD'd by the CAS as evidenced by their unlawful **20190201** child abduction initiated by conscience-free, pathological lying, case worker Mohammad Said ("Said") and perpetuated by equally-morally-bankrupt lawyer Brian Fisher ("Fisher") described at paras. 52-73.
7. The savagery of the CAS intensified as Andeé's long-awaited divorce from Kiska approached: by **August 2019**, they had begun to weaponize other rogue entities including, but not limited to, Ottawa's Crown Attorney's Office ("OCA") to ***further*** demonize, criminalize and marginalize her—as described at paras. 74-108 below—as well as emotionally and psychologically torture and terrify Sean & Cate.
8. Court performances in **2020 and 2021** further evidenced their disregard for and/or support of domestic violence and child abuse to the detriment of Sean & Cate[3]: the CAS IBD'd testimony and evidence that could have been used to protect Sean & Cate from Kiska during:
    a. a 2020 Summary Judgment Motion—detailed at paras. 109-125 below—and
    b. a 2021 Appeal and Motion to Adduce Fresh Evidence—noted at paras. 130-131 below— which contained too much evidence to be listed in this Statement of Claim.

[3] beyond that described at paras. 126-129

9. As a result, the emotional and psychological abuse of Sean & Cate **continued throughout 2022 and 2023** as they remained without ***any*** love or protection of their devoted mum, Andeé, for nearly five years; convinced that she:
    a. abandoned them as she no longer wanted them,
    b. was severely mentally ill and dangerous,
    c. was a criminal,
    d. refused to accept "treatment"[4] or follow any rules to be able to see them and
    e. who knows what else[5] (apparently, at one point they were told she moved to Texas?!?).
10. As of 20231107, the CAS:
    a. ***continued*** to enable, at a minimum, Kiska's ongoing emotional and psychological abuse of Sean & Cate,
    b. ***did nothing*** to mitigate their losses (despite having knowledge—or ought to be having knowledge—of the torts and crimes in which they have been involved) and, likely,
    c. ***continued*** to torture, traffic and terrorize other Ottawa citizens for pleasure and/or profit.

B. 20130301-20200228 CHRONOLOGY OF CAS-RELATED TORTS AND CRIMES pre-CONVID

11. The marriage between Andeé and Kiska began to unravel **early in 2013**, when:
    a. arguments about lifestyle and estate planning[6] escalated into a massive argument,
    b. Sir Winston Churchill's Vice Principal Greg Wyzynski ("Wyzynski") chose to contact the CAS,

[4] Treatment, that is, for some unidentifed, chronic mental illness of which Andeé has never exhibited symptoms
[5] CAS has refused to provide the complete, unredacted files to which Andeé was entitled since 2019
[6] This information was known, or ought to have been known, to the CAS ***prior*** to their unlawful 20190201 abduction of Sean & Cate as it was evidenced in a document that they were served entitled "20181231 Submission to Engelking". This fact was admitted by Said in an interview recorded on 20190619.

c. CAS's Yvonne Munro ("Munro") drilled Andeé for several hours about unrelated "mental illness" until she arbitrarily chose to give sole custody to Kiska and

d. Kiska's behaviour over the next 36 hours—with his newly-acquired power—resulted in Andeé's hospitalization for a nervous breakdown (eg. defensive dysregulation also known as a psychotic break).

12. From **20130303-05**, by covering his tracks and providing false collateral information[7] to TOH's Dr. Daniel Saul ("Saul"), Kiska ensured Andeé was mis-dignosed: she was released within 72 hours with a diagnosis of bi-polar disorder though she had ***zero*** symptoms of mania nor depression.

13. In other words, instead of being treated for Acute Adjustment Disorder or a Brief Psychotic Episode that resulted from narcissistic abuse, Andeé was labelled mentally ill[8] and received no relevant and/or effective medical assistance whatsoever.

14. On **20130306**, CAS's Jessica Henry ("Henry") IBD'd:

a. Andeé's son's teacher's testimony that "Daddy hit Mommy" and

b. the testimony of their family doctor, Judy Chow ("Chow") re: the fact that Andeé was a perfectly healthy, "awesome" mother.

15. Meanwhile, following their long-awaited, beach holiday in Mexico, Kiska escalated his verbal, emotional and psychological abuse in order to trigger *another* nervous breakdown—just in time for Henry's scheduled visit.

16. On or about **20130419**, Andeé wound up at the TOH again where they continued to take instructions from Kiska who wasted no time in planning his exit as he began to conspire with Andeé's estranged sister, Moira Moore—while continuing to deceive Andeé, Sean & Cate in multiple, sick and twisted ways.

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[7] Lying to psychiatrists is referred to as psychiatric abuse. It is ***also*** considered to be a form of psychological abuse known as "gaslighting" according to psychologist Dr. Iris Jackson's 20170317 report, page 3, para 1, final sentence.

[8] Evidence of Kiska's use of false collateral information in order to have her repeatedly misdiagnosed and/or hospitalized was first documented in Andeé's 20171117 Factum submitted to Justice Darlene Summers, which was also included in her 2021 Exhibit Book documents submitted to "The Three Stooges" for her 20211109 Appeal of the 20201110 SJM.

17. Following Andeé's release from TOH **six weeks later**—after Kiska enjoyed celebrating her's son's birthday without her—Kiska's took a break for a year until he began ramping up for an entire summer without having Andeé around.

18. On **20140710**, a similar hospitalization-resulting, verbal/emotional/psychological/psychiatric-abuse event was orchestrated when:

    a. Kiska *again* lied to "TOH" in order to have her formed involuntarily (with ***zero*** actual evidence required),

    b. TOH's Yoland Charbonneau ("Charbonneau") reduced Andeé's testimony regarding domestic violence to a value of zero claiming in a laughable Consent & Capacity Board hearing[9] that Andeé was "too sick to remember what she had done",

    c. Andeé was forced to spend the ***entire*** summer in the hospital without ***any*** visits from Sean & Cate and

    d. Kiska recruited Andeé's other estranged sister, Eileen Moore, to sign a Community Treatment Order for the forced ingestion and/or injection of psychotropics for a mental illness that she didn't have!

19. By this point, Andeé ***knew*** that somehow Kiska had learned how to cause her hospitalizations[10] and upon release she sought a divorce lawyer; albeit, without success.

20. Unprepared financially, by **mid-September 2014** Andeé was forced to abandon her plans for divorce and attempt a reconciliation.

21. The following 12 months were relatively uneventful as Andeé focused on parenting, her career and "keeping the peace" with Kiska.

[9] Of this, the CAS had knowledge, or ought to have had knowledge, as evidence of same was included as 20201106 Affidavit #2, Exhibit H in Andeé's rushed 20201110 SJM materials described at para. 103-116.
[10] She had not yet, however, understood his machinations, his overall motivations or his degree of wickedness.

22. On **20150926**, after obtaining a complete copy of her TOH files and reviewing the 1,500+ pages contained within,Andeé:

    a. discovered the evidence of Kiska's psychiatric abuse that forced her mis-diagnosis and lengthy hospitalizations,

    b. foolishly alerted Kiska that she would be seeking a divorce with grounds (ie. cruelty) and

    c. initiated her ***second*** separation from Kiska by setting up a separate room in the basement of their matrimonial home.[11]

23. Kiska's gaslighting immediately escalated and by **20151012**—after spending two days attempting to find assistance from OPSB, Gatineau Police and multiple shelters without success—Andeé drove herself ***back*** to the TOH desperate for help.

24. This time, nursing staff:

    a. did ***not*** ignore Andeé's testimony,

    b. did ***not*** prescribe any anti-psychotics and

    c. ***did*** follow her instructions regarding anxiety reduction in order to avoid a lengthy psychotic break.

25. While Andeé's diagnosis of bi-polar disorder was removed, TOH's Gary Kay ("Kay") refused to acknowledge Narcissistic Victim Syndrome or, its DSM-V equivalent, "Brief Psychotic Disorder with Marked Stressors"[12].

26. Kay diagnosed Andeé with "Psychosis, not otherwise specified" ("Psychosis NOS"), asked her to stay voluntarily in order to attend their occupational therapy sessions[13] regarding "anxiety management" and immediately provided her with virtually unlimited day passes.

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[11] Again, this was all well-documented in multiple court filings, many of which were served on the CAS over the years.
[12] The diagnosis to which Kay's "diagnosis" was fined-tuned by Dr. Iris Jackson on page 4 of her 20170327 opinion.
[13] Their in-house occupational therapy is the only reason for the TOH psych ward to exist, in Andeé's experienced opinion; however, one shouldn't need to be under lock and key to attend it.

27. As well as:

    a. completing her contract at Carleton University,

    b. attending a Board meeting at the Canadian Mental Health Association and

    c. exercising at TOH's on-site gym,

    Andeé ensured she was home every night to read bedtime stories to Sean & Cate.

28. On **20151106**, Kiska arranged to have his fiction entered into the CAS file by additional incompetent employees Mary MacDonald ("MacDonald") and Raina Swansburg ("Swansburg") who documented that:

    a. Andeé had been "discharged from the hospital with a diagnosis of schizo-affective disorder"—which was false—and

    b. the father was taking "good care of the children"—also false.

    Kiska was gaslighting Sean & Cate as much as he was Andeé as he plotted a divorce that would give him sole custody and her only supervised access (also documented in their files).

29. As Andeé attempted to find a lawyer, Kiska found one first—Bell Baker LLP ("Bell Baker")—and on **20151110** finalized his:

    a. Form 8: Application (for separation only) and

    b. devious Urgent Motion for Sole Custody (that was served; but, never filed/pursued by him[14]);

    both laden with EO&MO in order to frame Andeé as an unfit parent and gain strategic advantage in their pending divorce proceedings[15].

30. Unbeknownst to Andeé, collusion between Kiska's lawyer Wade Smith ("Smith") and Andeé's lawyer Victor Vallance Blais LLP ("Blais") resulted in ongoing abuse that would extend to include financial abuse: by the **end of April 2016**, Andeé was forced to end the

[14] The Motion materials were designed for force Andeé to hire the first lawyer she could: the Synidcate successfully steered her to the career criminals at Victor Vallance Blais LLP.
[15] This is a classic DARVO move used by all narcissists: **D**eny, **A**ttack, **R**everse **V**ictim **O**rder

disastrous, 50-50 shared parenting, 2-2-3 “nesting arrangement” that was advised by Blais and return to the matrimonial home to better prepare financially.

31. By the **end of November 2016**, after Kiska’s everything-but-the-bruises abuse had re-manifested, Andeé notified the CAS, her family doctor Judy Chow (“Chow”) and Blais that she would be leaving Kiska for the third and final time: Chow also notified the CAS.
32. Andeé secured a nearby condo and eventually (with the assistance of CAS’s Shawna McClemens (“McClemens”)) possession of her 3-bedroom rental propety; however, McClemens did ***zero*** to assist Andeé, Sean & Cate by way of protection from Kiska.
33. On **20170207**, CAS’s **Shawna McClemens** discounted Andeé’s testimony regarding Kiska’s sexual, verbal, emotional, psychological and psychiatric abuse to a value of zero (see page 1 of 50: Investigation #2402084) and closed the file.
34. Attempting to co-parent with Kiska remained disastrous as all forms of abuse continued including, but not limited to technology-assisted stalking and harassment (“TASH”), technology-assisted Fraud and the non-stop emotional abuse and gaslighting of Sean & Cate with examples too numerous to list in this statement of claim.
35. On **20170525**, Kiska began to involve OPSB more boldly: he staged an event—the Bicycle Incident—and, with full knowledge that Andeé had done nothing wrong, involved both his lawyer, Smith, and OPSB to attempt to intimidate her when she was merely attempt to care for Sean & Cate.
36. Kiska’s coercive control grew bolder each time he escaped consequence: as Andeé shielded Sean & Cate from the brunt of it, they remained—for the most part—unaware of their dad’s behaviour.

37. The **Autumn of 2017** brought new forms of threats against Sean & Cate which were impossible for Andeé to prove to law enforcement:
    a. the "Fresh Meat" incident and
    b. the "Lone Star Birthday" incident (documented on page 14)

    were particularly difficult.
38. On **20171210**, as well as those well-versed in TASH, OPSB was ***again*** recruited: this time, someone with the oh-so-coy name A. Schock who chose to assault Andeé when she simply asked to see some identification.
39. By **20180314**, it was impossible to know if the cries for help being received from Cate were legitimate; or, simply another orchestrated event as Kiska had multiple devices attached to her AppleID.
40. From **20180304-20180318**, another CAS employee Steven Tremblay ("Tremblay") ignored Andeé's pleas for help and closed the file!
41. On **20180402**, Andeé received from Tremblay a letter which completely ignored all of her evidence of Kiska's multiple forms of abuse; including, but not limited to his emotional/psychological abuse (ie. statements that he would "go for the jugular") and his financial abuse executed via his lawyer Smith and SCJ Julie Audet ("Audet").
42. Kiska was (and remains) the psychological version of Paul Bernardo; yet, as of April 2018, the CAS **forced** Andeé to rely on him as a "safety plan" to protect Sean & Cate! Purely demonic, Kiska revelled in this heightened, **documented** power.

43. Despite:

    a. the fraud committed in Family court,

    b. the 24/7, TASH-assisted stalking and harassment,

    c. the fact that Kiska refused to help in any meaningful way with the Canada Revenue Agency ("CRA") Audit[16] and

    d. the fact that he was neglecting both Sean & Cate while Andeé cared for them throughout their summer holidays,

    Andeé:

    a. convinced the CRA to vacate their gross negligence penalties and

    b. provided OCL clinician Katherine Bobula ("Bobula") with a complete copy of the FC-15-2446 Continuing Record so she could see the documented evidence of Kiska's verbal, emotional, psychological, psychiatric and financial abuse for herself.

44. On **20180711**, following a four-month investigation which ***included*** interviews with an extensive number of healthcare professionals, Bobula produced a 42-page report that, among other things:

    a. identified Andeé as the ***superior*** parent at page 18, para. 4 (and page 12) and

    b. stated that Andeé should have ***sole custody*** of Sean & Cate at page 19.

45. Bobula also documented how daughter Cate "***pulled away***" when Kiska attempted to hug her at page 12, para. 4.

46. By **mid-August 2018**, Andeé realized that she would not survive financially much longer: while Kiska remained in the matrimonial home paying merely $1,545/month in spousal and child support, Andeé relied mostly on credit cards to continue to shield Sean & Cate.

47. Accordingly, Andeé placed their modest bungalow on the market.

[16] Caused by the terrible advice of his accountant, Brian Mingie.

48. On **20180825**—in addition to publishing gang-stalking crew Bittersweet's interview on 20161122 (see para. 31 for interesting "coincidental" timing of this event)—the Ottawa Citizen published Andeé's letter to the editor "Let's support victims of domestic violence"; likely, to alert OPSB and other local gang-stalkers that "eliminating" Andeé was a "go".[17]
49. On **20180902**, Andeé had to inform Sean & Cate that they had to move ***again***: Kiska and his accomplices' ongoing financial abuse meant they had to sell the bungalow at 7 Vanson that they had grown to love … just to pay the bills.
50. By **20181031**, Andeé, Sean & Cate had moved into a 3-bedroom townhouse. Their living expenses tripled; however, with access to some of her savings, Andeé could continue to shield them from Kiska's abuse as she awaited the divorce trial.
51. On **20181231**—despite the ongoing stalking and harassment by Kiska and his accomplices—Moore prepared, filed and served a document ("2018 Submission to Engelking") which evidenced ***some*** of Kiska's abuse of Andeé, Sean & Cate.
52. **Early in January 2019**:
    a. the Kiska v. Moore FC-15-2446 divorce was finally placed on the September 2019 Trial List and
    b. Andeé hand-delivered her "2018 Submission to Engelking" to the assigned CAS "case worker", Viana Ibrahim ("Ibrahim"), ***and*** arranged for it to be scanned into the OPSB CopsLogic database.
53. Within two weeks, Andeé's Submission and the CAS file were transferred to CAS's Mohammed Said ("Said") who refused to provide to Andeé any details about how he wanted to "become involved with her family".
54. Aggressive and intimidating, like Kiska, Andeé attempted to contain Said's coercive control by asking that he communicate in writing.

[17] Kiska must have made another "payment".

55. In retaliation to Andeé's damning 20181231 Submission to Engelking, on **20190201**, Said and three OPSB officers illegally removed Sean & Cate from Andeé's living room and delivered them to Kiska:

    a. they did not have the required warrant,

    b. Sean & Cate were in no danger and

    c. the only statement made by Said was "see you in court in five days".

56. The malicoius abduction is partially evidenced by the very fact that, despite all of their allegations regarding Andeé's alleged "danger" to Sean & Cate and her "dangerously unstable" mental condition:

    a. there was **no "mental wellness" check**,

    b. Andeé was **not dragged off** to the TOH and formed and

    c. **no one even called** to see how she was.

    Said illegally apprehended Sean & Cate for Kiska's benefit because he could: he then lied in his Affidavit to deceive the court.

57. On **20190206**—merely fifteen minutes prior to the scheduled hearing with ZERO opportunity to defend herself—at the Ottawa courthouse for the second day-in-a-row (as NO ONE would provide to Andeé any date, time or materials), Andeé was handed what would be the beginnings of one of the most scandalous *CYFSA* files possible[18]:

    a. a 20190205 Protection Application,

    b. a Notice of Motion,

    c. an Affidavit of pathological liar Said which was laden with EO&MO,

[18] The FC-15-2446 Continuing Record, the FC-19-CP08 Continuing Record and the CAS's unredacted records for Andeé, Sean & Cate—given that "custody and access" is supposed to be the jurisdiction of Canada's federal *Divorce Act* which was totally circumvented by multiple pieces of [violated] provincial legislation—should be enough to dissassemble both the current child protection service model and Family court in the Province of Ontario, if not all of Canada. Collectively, they're nothing more than a front for organized crime where accomplices we call lawyers make off like bandits as loving parents and vulnerable children are destroyed. Note that at time of writing, Andeé is still married to Kiska—her attempted divorce costing Ontario taxpayers millions in past, current and future costs.

d. an Affidavit of equally-complicit Viana Ibrahim ("Ibrahim") which was also laden with EO&MO and

e. a for-Kiska-by-Kiska, self-serving "Plan of Care" for Sean & Cate designed to deceive the court and begin the "ghosting" of Andeé.

58. On **20190212**, the CAS also knowingly served on Andeé's sweet little boy, Sean, all of their defamatory libel accumulated thus far.

59. (Ergo, they likely served all the rest of their ficiton on both Sean & Cate in 2021 to get them file criminal charges against their mum when she was simply trying to see their pictures following over 48 months of Kiska's (and his accomplices') unbridled, intentional cruelty. How could Sean and Cate possibly know that their dad, his lawyer, the CAS, the OCL and ***all*** of the judges involved are nothing more than pro-pedophile, pro-human trafficking, demonic-managed carcasses with zero conscience.)

60. On **2019026**, the CAS went so far as to request a restraining order to the demise of Andeé, Sean & Cate for no good reason other than to appease Kiska.

61. On **20190314**, shortly after Andeé was unlawfully re-arrested in Quebec, ***without*** any proper process—but, ***with*** the assistance of SCJ-positioned crooked judge Mark Shelston ("Shelston") —the CAS changed its service protocol to electronic delivery when Andeé had no access to e-mail.

62. From **20190314-20190428**, Andeé was detained by some of Kiska et al.'s Quebec-positioned accomplices: they were simply preparing for their new 20190408 hearing date and expecting (or arranging) for Andeé to be without any materials and/or in default of the proceedings.

63. On **20190325**, Said produced a false document which stated, among other things, that:

a. Andeé's whereabouts were unknown,

b. she was "sending inappropriate text messages to the children" and

c. she "had suicidal thoughts".

when they were well aware of her whereabouts, she was not in a position to send ***any*** texts and she was ***not*** suicidal!

64. Kiska was simply busy feeding ***another*** crooked psychiatrist, Paule Kemgni ("Kemgni") false collateral information so he could continue to expand Andeé's fabricated history of mental illness.

65. Kemgni detained Andeé so that on **20190408**:

    a. an Eviction Scam could be completed via Kiska's other accomplices without her knowledge,

    b. she would be unable to defend herself in CAS's malicious *CYFSA* "hearing" and

    c. a bogus NCR opinion could be crafted for Kiska's benefit.

66. On 20190408, the Final/not-Final protection order was issued by SCJ's Calum MacLeod ("MacLeod") without the actual service of a ***single*** document on Andeé: their documents weren't even filed with the court in time for the hearing!

67. Likely not even received or read by MacLeod, the CAS-Kiska submissions were simply an extension of the defamatory libel already served two months previously.

68. Despite her request, MacLeod refused ***any*** adjournment claiming that:

    a. Andeé has "never filed anything",

    b. adjournment would harm Sean & Cate and

    c. she'd have another opportunity in four months;

    all statements which were dominated by obvious errors, omissions and/or malicious misstatements of the truth.

69. On **20190428**, after Kiska was ensured of:

    a. Andeé's eviction and the theft of all of her, Sean & Cate's possessions,

    b. her loss of custody of Sean & Cate and

    c. the defamatory medical opinion regarding her mental health,

she was fully acquitted as she never committed any crime in the first place.

70. Kiska continued to torture Andeé and abuse Sean & Cate following her acquittal:

    a. On **20190515** Kiska mocked Andeé regarding the theft of all of her possessions and his ultimate power;

    b. On **20190516** Kiska continued to violate the 20190408 order by refusing to co-operate with Andeé or letting her communicate with Sean & Cate;

71. (Aside: Kiska's disobeyance of the court orders he illegally obtained extended beyond Andeé. Fearless of any consequences, he even disobeyed the order by not co-operating with the CAS, a fact that even Said stated in his 20201019 Affidavit at para. 202 which stated, among other things, that:

    "Mr. Kiska was visibly angry and stated to me that my monthly presence in the home does not mean anything to him and that the children do not want to see me. He stated that he has been fighting the Society for a long time and that **CAS only did things as a result of his fights and that his anger was the reason why CAS changed its position not to withdraw the application**."[19])

72. Said also documented that Kiska had informed Sean & Cate that Andeé had "[moved to Texas and did not want to be their mother anymore]": even though he had knowledge, or ought to have have had knowledge, that this statement was entirely false, Said ignored this horrific form of child abuse.

73. Due to the obvious criminality of Canada, Andeé spent most of **May-July 2019** attempting to restore her damaged reputation (and destroyed career) in the United States, as she anxiously waited for the September 2019 divorce trial that she naively hoped would remove from her life the nightmare that was Kiska for once and for all.

[19] Did Said have another "buyer" of Sean & Cate lined up? Did he use this leverage to force Kiska to "pay up"?

74. By June 2019, the CAS—and many others—were made ***well aware*** of the never-ending abuse that Andeé, Sean & Cate were enduring because she circulated e-mail evidence to as many as possible throughout the torturous period when:

    a. Kiska denied ***any*** meaningful communication with Cate[20] and ***all*** communication with Sean (while under the illegally-obtained restraining order for same),

    b. Kiska refused to notify Sean & Cate of the gifts she had couriered to them, for Sean's 13th birthday,

    c. OCDSB administration refused to let Andeé console her daughter Cate with a gesture of flowers and

    d. CAS's Jenn Campbell ("Campbell") obfuscated the scheduling of any visits.

75. As evidenced in a **20190619** interview, Said:

    a. ***knew*** Andeé was a loving mother,

    b. ***did not read*** her 2018 Submission to Engelking and

    c. ***did not know*** what a narcissist was.

76. On **20190626**, Campbell and Kiska colluded to ***create*** a new rule that would surely cancel Andeé's long-awaited visit with Sean & Cate: she was to hand over her evidence-laden phones to security.

77. As she had ***zero*** reason to trust any CAS employee or Kiska, Andeé offered to turn off her phones and leave them in the hallway where she could see them; however, this suggestion was refused and the visit was cruelly cancelled.

78. Kiska exclaimed to CAS's Said/Campbell: "the only way for her to see [Sean & Cate] now is if she violates the [illegally-obtained, unlawful, child-abusing] 20190408 *CYFSA* Order.

79. This event was later maliciously mis-reported in their Affidavits served on Andeé's son and filed with the court.

[20] Andeé received only one call, ever: heavily supervised, Cate called to cry "Aren't you even going to come to my graduation!!!" having no idea that her mum would be arrested if she tried. Then, she was forced to end the call. There is zero limit to Kiska's cruelty.

80. Concerned that Kiska would be forced to revert to shared custody of Sean & Cate with their mum, he circumvented formal process, contacted the CAS and asked for "help".

81. Within two weeks, by **20190727**, Andeé was:

    a. ignored by OPSB's Alex Kirady,

    b. charged with criminal harassment by OPSB's Jean Benoit,

    c. prosecuted by OCA's Mike Boyce and

    d. denied bail by OCJ's JP Paul Harris.

82. Two days later, on **20190729**, Audet "suddenly" chose to acknowledge Andeé's requests[21].

83. The next day, on **20197030**, CAS's Tara MacDougall stated to Kiska's lawyer, Smith, that "[now that she's in jail, sole custody and access should be a snap! Great job team!]".

84. Andeé securely detained and ***without*** access to neither her evidence nor legal counsel, on **20190808**[22] the CAS started a ***new*** Continuing Record ("C.R.") in order to bury the fact that the ***entire*** file against her (evidenced in the original, 15-tab Continuing Record) was based on nothing but Kiska's self-serving, malicious hearsay—just as was Paule Kemgni's scandalous 20190408 NCR opinion of ***exactly*** four months previously (by design).

85. Andeé had no choice but to respond to their materials from a jail cell with ***zero*** evidence, resources or assistance; something the demons must have enjoyed immensely given characteristics of sociopaths #25.

86. Not yet aware that the ***entire*** system was a complete racket—and fortunate to have been defrauded so much that she abandoned credit cards was arrested with a significant amount of cash, the only way to purchase canteen items—she began her Mail Campaign and recorded the recipients via a Tracking Sheet.

[21] Note that page 2 of this 3-page endorsement was intentionally left blank; to be completed later depending on Andeé's circumstances. More evidence of this ploy is gleaned from a review of Pamela MacEachern's shady work.
[22] They claim this was created 20190806; however, that's impossible (and/or, illegal) as Andeé wasn't served the documents until 20190808 as should be accurately recorded at the Ottawa-Carleton Detention Centre ("OCDC") and consistent with Andeé's own records for 20190808.

87. Noteworthy, among other materials, was the **20190814** 54-page fax sent to both[23] the OCA and the CAS which included documents:

    a. (l) Form 33B.1 Answer,

    b. (m) Overview of offences committed to obtain Calum MacLeod's 20190408 *CYFSA* Order,

    c. (n) Up-to-date Summary,

    d. (o) Disclosure: Gervais-Kiska Notes,

    e. (j) 20190812 2-page letter to Crown,

    f. (p) Hand-written copy of Calum MacLeod's unlawful 20190408 *CYFSA* Order,

    g. (q) Smith's post-arranged-arrest 20190806 letter to Engelking and

    h. (r) Engelking's 20190809 endorsement.

88. On **20191015**, with the direction and assistance of Engelking, CAS planned its Third-party Records Motion and appointment of Ontario's Public Guardian and Trustee, ("OPGT"), knowing that the OCA was "on board" and Andeé had no way to defend herself.

89. (Meanwhile—using perjury and defamatory libel—on **20191021**, OCA saddled Andeé with utterly useless *Amicus Curiae* ("*Amicus*") John Hale: when she was released on bail 20191030 following Moiz Karimjee's (hopefully) career-destroying performance, she had no choice but to attempt to find counsel in order to shake both CAS's muting OPGT and OCA's muting *Amicus*.

90. Immediately after Andeé's **20191030** release from OCDC, Said created his next piece of fiction: his 20191031 Affidavit which was ***again*** laden with EO&MO. For example, Said stated at para. 13 that:

    "[Andeé] **kidnapped** [Sean & Cate] in the year 2015 after which she was admitted to the hospital for six weeks. She was admitted for the total of about 21 weeks at the Civic

[23] The fax confirmations are here.

hospital in the Spring of 2013, the Summer of 2014 and the Fall of 2015. In the Fall of 2015, there was an amber alert issued by police when [she] **kidnapped** [Sean & Cate] and took them away with their belongings" when, in reality:

a. The CAS knew, or ought to have known: Andeé **fled** with Sean & Cate to the safest place she knew, the Hilton Lac Lemay, and sought assistance from shelters and police to no avail. She had to return; but, when the Jekyll & Hyde Kiska re-emerged, she waited for extended family to arrive so the children would be safe and fled to the TOH for assistance.

b. The CAS knew, or ought to have known: Andeé attended the OPSB station that weekend ***with*** Sean & Cate and **spoke to police** about Kiska's various forms of domestic violence.[24]

c. The CAS knew, or ought to have known (as the evidence was included in the 2018 Submission to Engelking that Andeé hand-delivered to the CAS in January 2018 as detailed at para. 52 above): OPS's Sebastien Paradis **failed to properly investigate** her allegations of sexual assault and closed the file.

d. The CAS knew, or ought to have known, Moore stayed **voluntarily** at the TOH for four weeks (as detailed at paras. 22-27 above) and provided to the CAS consent forms so they could speak with both Chow and Kay.

91. Mohammed Said is a **pathological liar** who was working for the benefit of Kiska, not Sean nor Cate, the ENTIRE TIME HE HAD THE FILE (like everyone else at the CAS).

92. Not yet aware of the motivations of some Elizabeth Fry staff, and desperate to shake the OPGT and Amicus, Andeé accepted their recommendations for two lawyers. As planned, her

[24] Sadly, Andeé's report for sexual assault was given to just-another-crooked-cop, Sebatien Paradis.

retention of shyster #1, Joe Addelman, immediately led to the retention of shyster #2, Gonen Snir.[25]

93. Addelman immediately worked on Andeé to convince her to volunteer for a psychiatric assessment from crooked pyschiatrist Zeynep Selaman (for Kiska's benefit) and Snir immediately lost a Third-party records motion (heard by just-another-crooked-judge Pamela MacEachern) that handed over ***all*** of her confidential medical files and ***all*** police files to both the CAS ***and*** Kiska[26].

94. Meanwhile, on **20200102**, MacDougall:

    a. attempted to extort Andeé into agreeing to sole custody for Kiska and

    b. acknowledged that they had ***zero*** protection concerns regarding Andeé's mental stability.

95. Andeé spent the first two months of 2020 being de-frauded, defamed and/or terrorized by career criminals including, but not limited to, those enabled by:

    a. Elizabeth Fry's Lotus House,

    b. SCJ's "*CYFSA*"/Family court,

    c. SCJ's Criminal court,

    d. SCJ's Civil court,

    e. the Royal Ottawa Mental Health Centre and

    f. Ottawa's gang-stalking network;

    until she decided to contact a travel agent and take a 2-week working vacation in Cuba for March Break.

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[25] That fiasco remains ongoing as both are now represented by career criminals including, but not limited to, Nelligan O'Brien Payne LLP's Craig O'Brien and Gardiner Roberts LLP's James Cook; as well as aided by two questionable judiciary officials, Sylvia Corthorn and Marie Fortier.

[26] Noteworthy is the fact that not a ***single*** third-party document was used in ***any*** of their court submissions as ***all*** files evidenced Kiska's domestic violence! The only one who included hospital records and police files as evidence in court submissions was Andeé; however, every single Family court judge chose to remain willfully blind to the domestic violence and child abuse; just as Criminal court's Kevin B. Phillips did when he illegally issued an anti-Charter gag order against her on 20191108 and Jonathan Brunet did when he sentenced Sean & Cate to an additional three years without their mum.

C. 20200301-20201109 CHRONOLOGY OF CAS-RELATED TORTS AND CRIMES pre-CAS SUMMARY JUDGMENT MOTION

96. Instead of a well-deserved vacation, however, convid hit shortly after Andeé's arrival and the tour operator requested that she return to Canada immediately.

97. Sensing that the plandemic was ridiculous, Andeé chose to attempt to seek assistance from embassies in Ireland instead as she, Sean & Cate have citizenship of both Ireland (ie. the European Union) and the United Kingdom by birthright.

98. By **20200331**, the OCA—and Andeé's somewhat illiterate John Howard Society ("JHS") Bail Supervisor, Melissa Bradford ("Bradford")—chose to convert Andeé's detoured holiday into a breach allegation and "Andeé's at Large!" rhetoric even though:

    a. her rent (where most of her belongings were) in Canada was paid up until 20200407,

    b. she remained in contact with all relevant legal parties and

    c. she was merely attempting to seek assistance in rescuing Sean & Cate.

99. Threatened with another malicious re-arrest, from **20200401-20200820** Andeé chose to remain out-of-courty while she continued to fight for Sean & Cate: she wanted to publish as much evidence as possible[27] against Kiska, the CAS, the OCA, the OPSB and others involved in the ongoing abuse of Sean & Cate—even though she was not yet fully aware of true extent of the court-enabled, human-trafficking, crime syndicate.

100. Despite evidence of this, on **20200827**, the CAS argued once again that:

    a. the OPGT should be appointed as Andeé was a "special party" and

    b. her faux attorney Snir should not be removed from record until this is complete.

101. Then, on **20200828**, the CAS scheduled a SJM "well in advance of the trial" to rob Andeé of her right to cross examine their so-called witnesses or call on any of her own.

[27] Her work was forcibly removed from public view following successful extortion by the OCA. On 20210409, Andeé would be denied bail (for the false breach allegation) if she did not password protect it via username: MooresTeam and password #SlashTheirBudget! at www.twb.rocks.

102. On **20200919**, immediately following service on OCA's Malcolm Savage and SCJ's Criminal court of Andeé's OCA/SCJ/CAS/OPSB/Kiska-incriminating materials for a Bail Review, she was re-arrested.

103. ***Again*** being denied bail and ***again*** without access to evidence and ***again*** with a **20201110** CAS SJM looming, Andeé was force to seek out representation; this time, via Legal Aid-funding.

104. Without any ability to perform a reference check, Andeé unwittingly retained ***another*** syndicate accomplice: Cedric Nahum ("Nahum").

105. On **20201013**, Andeé was released from OCDC; albeit, saddled with:

a. Nahum,

b. a GPS-monitoring ankle bracelet and

c. a curfew

while ***all*** of her technology and personal possessions remained in St. Catherines.[28]

106. On **20201019**, team CAS-Kiska continued to cruelly deny Sean & Cate any communication with Andeé.

107. For the next two weeks, Nahum pretended to assist Andeé when, in fact, he did next to nothing other than advise her ***not*** to provide any consent forms to Said: meanwhile, Andeé provided consent forms that Said refused to act upon. In particular, he refused to connect with Andeé's current social worker Catherine Sullivan.

108. Prior to the filing deadline for materials—mistaking Cedric Nahum for an attorney simply ignorant of non-physical domestic violence instead of a member of Ottawa's white-

[28] How convenient for Ottawa's court-enabled crime syndicate! Luckily, St. Anthony returned one of Andeé's bank drafts and tucked it into her wallet so she could afford to hire a Blue Line taxi to drive to St. Catherines and retrieve everything for her.

/blue-/thug-collar crime ring—Andeé released him as so she could produce her own materials.[29]

109. Then, on **20201103**, Kiska's lawyer Smith decided to illegally serve a Notice of Motion to piggy-back the CAS's Summary Judgment Motion in order to get a restraining order.

110. Once ***again***, the Rules of Civil Procedure were abandoned to Andeé's detriment as she had no time to prepare properly to defend herself: the court simply allowed the matter to be heard.

111. Kiska's self-serving (and self-incriminating) materials were:

a. a Notice of Motion and

b. a 69-para. Affidavit laden with EO&MO and no real evidence (as always) and

c. a laughable 5-page Factum (which I was easily able to refute).

112. On **20201105**, to keep Andeé duped into believing he was a legitimate lawyer looking out for her best interests, Nahum, acknowledged that "there has been mass incompetence on her file at every level".[30]

113. On **20201105**, Andeé served on the CAS her Confirmation of Motion where she sought a Summary Judgement against Kiska and much, much more.

114. On **20201105**, Andeé served on the CAS a 9-page Affidavit which referred to 22 exhibits that evidenced:

a. TOH relied ***enitrely*** on Kiska's "collateral information" to deem Andeé "mentally ill";

b. Andeé and Kiska were arguing heavily in 2013;

c. Kiska was scheming for divorce since April 2013;

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[29] Interestingly, despite all of CAS's claims of mental instability, the CAS chose ***not*** to adjourn the matter in order to appoint the OPGT. With only a few days until Andeé's materials were due, they must have figured there was no way she could produce anything of value in time. (They don't know [Andeé] Jak.) Either that, or Mary Fraser was already "bought and paid for".

[30] Sadly, the "mass incompetence" extended to Nahum himself and he had to eventually be released and reported as a member of this crime syndicate as well; his comment to Savage being more of a "Great job!" than a "Shame on you".

d. Andeé begged for assistance from the CAS;

e. Kiska stated he was "going for the jugular" and "spending his last dollar" to destroy Andeé;

f. Andeé's reaction to Kiska's domestic violence would happen to anyone;

g. Kiska's verbal abuse and domestic violence;

h. Third-party testimony regarding Kiska's aggressive, intimidating nature;

i. Third-party testimony regarding Andeé's mental health and devotion to Sean & Cate;

j. a responsible diagnosis: Acute Adjustment Disorder;

k. another responsible diagnosis was Psychosis, not otherwise specified;

l. Kiska lied to OPSB by stating that Andeé was bi-polar ***and*** schizophrenic[31];

m. Kiksa lied to OPSB by stating that Andeé was schizo-affective;

n. Andeé received leave from the court to seek damages of Kiska's crimes and torts in a Family court setting: her documents were ***rife*** with evidence;

o. Ottawa Victims' Services supported Andeé's quest for justice;

p. Andeé was the only responsible parent with respect to her daughter's tutoring

q. the OCL recommended that sole custody was awarded to Andeé as she was the superior parent;

r. Andeé was attempting to assist other victims of narcissistic abuse;

s. Andeé attempted to seek assistance from local shelters (who also demonstrated their pro-domestic violence stance not unlike Leighann Burns who has infiltrated Legal Aid Ontario as well);

t. Kiska committed, among other things, Fraud in family court;

u. Kiska participated in the unlawful eviction of Andeé and facilitated the theft of everything she owned; and

[31] Note that Kiska repeated this lie to OPSB in 2019 in order to arrange for her re-arrest as noted at para. 81

v. one of the motivations of Kiska is to deprive Andeé of her fair share of the matrimonial home.[32]

115. On **20201105**, Andeé served on the CAS a 13-page Factum which referred to 3 exhibits that evidenced:

a. the 20161213 Interim Shared Parenting Agreement,

b. Andeé's intention to divorce Kiska for cruetly in 2015 and

c. the illegal manner in which Kiska's lawyer, Smith, brought a Motion for a restraining order against Andeé.

116. On **20201106**, Andeé served on the CAS a supplementary 3-page Affidavit that referred to eight exhibits which evidenced:

a. Kiska was a pathological liar: Andeé had never been a patient at the Royal Ottawa;

b. Andeé was duped by a crooked lawyer into agreeing to a voluntary psychiatric assessment by a crooked psychiatrist at the Royal Ottawa in 2020 for Kiska's benefit;

c. Kiska's coercive control and Andeé's foolish attempt to have a rationale discussion with a covert, malignant narcissist who's planning her demise;

d. Again, Andeé's intention to divorce Kiska for cruelty in 2015;

e. Ottawa's Crown Attorney's Office was complicit in the malicious prosecution of Andeé, for Kiska's benefit;

f. Ottawa's Crown Attorney's Office was complicit in the cover-up of crime being commited against Andeé, for the CAS's benefit;

g. TOH's choice to believe Kiska's ***false, unsubstantiated*** "collateral information" to involuntarily hospitalize Andeé when she was there seeking refuge from Kiska multi-faceted abuse; and

[32] Note that as of 20231106, Andeé is forced to live in a women's shelter and collect social assistance while Kiska remains in their matrimonial home, with their two 100% gaslit teens, enjoying the free, ongiong torture of her.

h. TOH's onging reliance on Kiska's ***false*** "collateral information" to keep Andeé hospitalized for an entire summer in 2014.

D. THE 20201110 SUMMARY JUDGMENT MOTION—CAS KNOWINGLY ASKS THE COURT TO GIVE SEAN & CATE TO THE ABUSER

117. Instead of requesting a meeting with Andeé or adjourning the SJM, the CAS IBD'd Andeé's SJM-related irrefutable testimony and evidence.

118. The CAS did not object to Kiska's illegally-brought Motion scheduled to be heard 20201110 in a Respondend-v-Respondent, "piggy-backing" fashion with full knowledge of:

a. Kiska's long-term abuse of Andeé, Sean & Cate,

b. Kiska's pathological lies and

c. Kiska's co-coercive control.

119. The CAS chose (once again) to be a party to, among other things, obstruction of justice—a violation of S. 139(3) of the *Criminal Code* of Canada.

120. On **20201110**, the CAS argued that there were no issues for trial and supported a Summary Judgment against Andeé in favour of the abusive parent, Kiska.

121. On **20201110**, the CAS proceeded to argue its position which was supported by nothing but hearsay, defamation and false allegations bundled as multiple legal documents—most of which was inadmissable—including, but not limited to:

a. three affidavits from employed pathological liars: Said, Ibrahim and Campbell and

b. a Factum from Deborah Souder who cut and paste the Said-Ibrahim-Campbell lies into a 33-page document that was clearly some template from other children she had terrorized in the past.

122. Despite having obtained ***all*** of Andeé's medical records and police files, **not a single third-party document** was used to corroborate their allegations of her mental illness: the records

evidenced her, Sean & Cate's years of severe domestic violence; so, the CAS IBD'd that information as well.

123. There was seemingly no lie that the CAS, the OCL, Smith or Kiska would not tell in order to destroy Andeé: this is evidence by the 117-page transcript of the 20201110 SJM. By extension, there is no lie that they would not tell to ensure Sean & Cate lost their demoted mum … forever.

124. The irreparable harm done to children—both mentally and physically—when they are abondoned by a parent is well documented and the group noted at para. 123 above have ensured that Sean & Cate believe they were abandoned by Andeé when nothing could be further from the truth.

125. It is fair to presume that Kiska and/or his accomplices threatened and/or compensated SCJ's Justice Mary Fraser for her decision which stated, among other things, that there were no triable issues: hopefully she will share a cell with former CAS-employee, Tracy Engelking, who IBD'd volumes of evidence in the divorce file FC-15-2446 in order to schedule the scandalous SJM on 20200828 in the first place.

E. 20201111-20211108 CHRONOLOGY OF CAS-RELATED TORTS AND CRIMES pre-SCJ's DIVISIONAL COURT DENIAL OF APPEAL

126. From **20201110-20200114** Andeé was denied ***any*** communication with Sean & Cate in the weeks that followed even though the 20201211 orders were not released until 20201214 and 20210114, respectively.[33]

127. Denial of ***all*** communication with Sean & Cate by Kiska continued, as expected, and, on **20210225**, Kiska finally admitted to the court that "he would prefer no contact with [Andeé] whatsoever".

128. As well as immediately commencing an appeal against both illegally-obtained orders, Andeé prepared her next round of ***attempted*** "justice seeking" as the 2-years Statute of Limitations was

[33] Demon-managed carcasses like to establish patterns with their dates. Likely, 20210214 was supposed to trigger something subliminally. Sociopaths are not … quite … human.

drawing near on the "Kemgni-Kiska 20190408 Bogus NCR Opinion " and the "There-is-no-Allah 20190408 Eviction Scam" as noted at paras. 61-69.

129. In addition, Andeé was still battling nine-soon-to-be-fourteen charges in Criminal court.[34]

130. By **20210715**, in addition to preparing, serving and filing the standard materials required for a Divisonal court Appeal, Andeé also filed materials for her Motion seeking leave to Adduce Fresh Evidence: collectively, these materials establish "beyond a reasonable doubt" for many of the individuals listed at https://pfi.rocks/organized-crime/vis/.

F. 20211109 SCJ's DIVISIONAL COURT DENIAL OF APPEAL (aka **CAS ignores 1,000's of pages of evidence of severe domestic violence and child abuse+++)**

131. Instead of requesting a meeting with Andeé or adjourning the Appeal, the CAS IBD'd Andeé's Appeal-related irrefutable testimony and evidence of years of domestic violence, child abuse and taxpayer-funded torture, trafficking and terrorism.

132. Note that OCL "agent" Susan Galarneau's submissions were just as scandalous and she is being sued in a separate action for her involvement in child abuse and her Breach of Fiduciary Duty to Sean & Cate in a separate action viewable (in due course) at https://pfi.rocks/organized-crime/vis/susan-galarneau.

133. (Insert details of who argued what)

[34] Details of this will be included in #Mummygate in a scene entitled "The Smoking Gun" with soundtrack "Bang Bang" by Nancy Sinatra.

G. CONCLUSION

134. In summary, despite the CAS having a mountain of evidence of Kiska's long-term abuse of Andeé, Sean & Cate, Andeé lost both the Summary Judgment Motion and her Appeal against the CAS. The reason? A mental illness:

a. that she did not have,

b. of which they had no evidence and

c. that was a malicious fairy tale narrated by Kiska and merely transcribed by his many incompetent minions and/or criminal accomplices.

135. At para. 268 of the resulting 20211221 D.M. v. The Children's Aid Society of Ottawa, 2021 ONSC 8360 decision, it was stated that:

> "In her pursuit of access to justice, she is impeded by her mental illness and a costs award against an impecunious, homeless and impeded litigant is not in the interests of justice and would just be cold-hearted, meaningless, and just mean."

so that Kiska could let Sean & Cate read that defamatory libel too[35].

136. Although Kiska's OCA-positioned accomplices dropped most of its 14 bogus charges after Andeé illegally lost custody of Sean & Cate, she remains saddled with an illegally-obtained, child-abusing, anti-Charter, three-year Probation Order…which never would have existed ***but for*** the CAS's long-term, self-serving, incompetent and/or criminal handling of a mother's child protection file.

137. As Kiska's multi-faceted abuse continues to this day–while Andeé's mental fortitude evidences that she never suffered from any chronic illness in the first place, CAS's inability to assist children in cases of non-physical domestic violence is beyond any reasonable doubt.

[35] Likely, sealing in their minds that their mum was truly lost and accomplishing the 100% child alienation that Kiska—as the cover, malignant narcissist (aka "narcopath") that he is and has been from day #1—so desired.

138. ***But for*** the negligent, careless, tortious, malicious and/or criminal behaviour of the CAS, Sean & Cate would have never been deprived of Andeé's love and protection.

139. The CAS could have attempted to put an end to Andeé, Sean & Cate's suffering by, at the latest, December 2018; instead, they chose to prolong it … into perpetuity.

140. Andeé has now been ***fully*** alienated from Sean & Cate and, even worse, they have sustained the ***irreparable*** harm that is associated with not only parental alienation but ***child alienation***.

141. Due to the actions and inactions of the CAS—including, but not limited to, ***not*** reporting Kiska or his OPSB/OCA/OCJ/SCJ-enabled accomplices to law enforcment—Andeé also continues to endure:

a. childlessness,

b. homelessness,

c. poverty and

d. humiliation, demonization, ostracization, marginalization and unemployability which continues to this day.

142. To further mock Andeé, CAS's "client"—aka Kiska—no longer even bothers to respond to requests to communicate with Sean & Cate as is being published under "Status of court-enabled Legal Quagmire & Other items" at https://pfi.rocks/ontario-works.

143. On **20231019**, CAS agent-come-employee Brian Fisher stated he would "vigorously defend" his group of court-enabled terrorists against this Civil Action: it is Andeé's hope that:

a. this action is successful,

b. the CAS is bankrupted and

c. all CAS-related perpetrators are denied bail, refused any plea deal and forced to pay for their own incarcerations and/or hospitalizations as they are studied for the perfect examples of sociopath/demonic behaviour that they exhibit.

144. One can only imagine how many other children the CAS has destroyed as it:

a. IBD'd evidence of domestic violence and

b. ripped the safe, devoted parent from the lives of vulnerable children.

Damages awarded for their despicable involvement in the destruction of family will be used to assist CAS targets in their long journey of healing.

145. As of **20231107**, the CAS has made no attempt to mitigate the impact of this civil action on their taxpayer-funded, for-profit, accountability/oversight-free enterprise: they are as fearless of any consequences as is Kiska[36].

146. Hopefully, this pleading is not "***prolix***" and does not offend the "principal of proportionality" as noted at paragraph 29 by Madam Justice D. Summers in her Honour's 20171116 decision (see Kiska v. Moore 2017 ONSC 6872 (CanLII)) which permits Andeé to seek ***multiple*** damages from Kiska for violations of both Civil Law and the *Criminal Code* of Canada in a … FAMILY … COURT … SETTING

should the court-positioned members of the Syndicate ever permit her to schedule a trial.

November 7, 2023

Deirdre Moore, c/o YWCA Women's Shelter
6135 Culp Street, Niagara Falls, ON L2G 2B6
(613) 848-6832 dmoore@pfi.rocks

[36] This, another reason they should be "put under glass" for intense study.

Court File No.

DEIRDRE MOORE vs. THE CHILDREN'S AID SOCIETY OF OTTAWA

DEIRDRE MOORE vs. THE CHILDREN'S AID SOCIETY OF OTTAWA

ONTARIO

SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT 59 CHURCH STREET

ST. CATHARINES, ONTARIO L2R 7N8

STATEMENT OF CLAIM

Plaintiff:
Deirdre Moore c/o 6135 Culp Street, Niagara Falls, ON L2G 2B6
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