ONTARIO

CV-23-00061902-0000

SUPERIOR COURT OF JUSTICE

B E T W E E N:

Deirdre Moore *plaintiff*

and

Regional Municipality of Niagara Police Services Board *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 $15,000.00 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 NOV 30 2023 Issued by A Blenkhorn

Local registrar

Address of 59 Church Street

Court Office St. Catharines ON

TO Regional Municipality of Niagara Police Services Board, 5700 Valley Way Niagara Falls, ON L2E 1X8

CLAIM

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

    a. pecuniary damages in the amount of $3,400,000[1, 2] due to its:

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

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

        iii. intentional infliction of emotional suffering and/or mental harm, negligent infliction of emotional suffering and/or mental harm 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 $3,400,000 (less any amount awarded as damages described at para. 1 a) due to its:

        i. defamation, negligence and/or negligent investigation;

        ii. willful blindness and/or recklessness;

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

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

    of Andeé, a devoted mother of two and province of Ontario ("Ontario") taxpayer and Niagara Falls, Ontario ("Niagara") resident;

    c. compensatory damages in the amount of $100,000[3] for:

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

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[1] Rounded up from 20231125 calculation: $714,845 x 3.25 + $100,000 x 3 x 3 + $150,000 =$3,373,246.25

[2] Ideally, an amount that will force them to do their job?

[3] That is, the estimated amount spent by NRPS on false allegation crafting and/or documentation and/or unlawful detention that led to malicious prosecution and/or other violations of civil law and/or the *Criminal Code* of Canada ("*CCC*")

ii. complicity in 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 Ontario and/or Niagara;[4]

d. compensatory damages in the amount of $1,000/month (spent by Niagara's "Ontario Works" and/or shelter-related affiliates) retroactive to 20230915 for:

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

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

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

which led to Andeé's continued homelessness and/or dependence on social assistance and various homeless shelters;[5]

e. special damages in an amount to be determined with particulars provided prior to trial;

f. 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;

g. costs of this action on a full indemnity basis; and

h. such further and other relief as deemed appropriate and tenable by the court.

[4] It is Andeé's hope that when Niagara taxpayers review the tax deductions on their pay stubs, they realize they are funding organized crime with their hard-earned wages that are merely funnelled through to NRPS.
[5] including, but not limited to, Niagara's YWCA Women's Shelter

INTRODUCTION

2. The manner in which NRPS has de-frauded Niagara and/or Ontario while continuing to, among other things, directly and/or indirectly torture, terrorize and/or traffic Andeé and/or Sean & Cate since September 2020 is described below using the following structure:

	Heading	pages	Paras.
A.	Background	04 – 11	003 – 021
B.	NRPS' Constable Casey Tennant	11 – 13	022 – 034
C.	Ottawa's #TDVCA[6] Municipal Mafia: Testimony + Evidence served up on a Silver Platter	13 – 14	035 – 035
D.	NRPS' Constable Michael Brown	14 – 16	036 – 049
E.	NRPS' Professional Standards Unit	17 – 18	050 – 061
F.	Legal Tests	19 – 19	062 – 063
G.	Conclusion	20 – 22	064 – 077

[6] Taxpayer-funded Domestic Violence and Child Abuse

A. BACKGROUND

3. The events leading **up to the 2020** involvement of NRPS in Andeé's—and by extension, Sean & Cate's—life as described at paras. 8-9 below, were:

   ✓ **I**gnored,

   ✓ **B**uried and/or

   ✓ **D**iscounted-to-a-value-of-zero

   ("IBD")'d[7] by ***multiple*** "agents", employees and/or volunteers of this taxpayer-funded entity, the NRPS.

4. In September 2020, during their first encounter, instead of protecting Andeé and Sean & Cate from further crime, NRPS' Constable Casey Tennant ("Tennant") arrested her!

5. Then, on or about 20200922, Tennant ***chose*** to violate not merely civil law but the *CCC* in order to protect Ottawa's #TDVCA Municipal Mafia.

6. See Section B, paras. 22-34 below for additional Tennant-related allegations.

7. These choices were ***repeated*** in 2023 as Andeé's desperate pleas for help were ***again*** IBD'd as she entered her ***eleventh*** year attempting to divorce covert, malignant narcissist Jonathan William Patrick Kiska (d.o.b. 19600929 of 1244 Lampman Crescent, Ottawa, ON K2C 1P8, "Kiska") to the irreparable detriment of Sean & Cate and at ***great*** cost and suffering to Andeé which continues at time of writing.

[7] From 2020 to 2023, the NRPS' collective IBD progressed from resulting in common torts including, but not limited to, intentional and/or negligent infliction of emotional suffering and/or mental harm to crimes including, but not limited to, violations of:

- ✓ S. 300 Defamatory Libel,
- ✓ S. 366 Forgery/Making False Document,
- ✓ S. 139(3) Offence of Obstructing Justice
- ✓ S. 269.1 Torture,
- ✓ S. 279.01 Trafficking in persons,
- ✓ S. 83.19 Facilitating Terrorist Activity,
- ✓ S. 380(1)(a) Fraud against Andeé and/or the taxpayers of Niagara and/or Ontario and
- ✓ S. 26(1) Disobey a Statute

directly and/or indirectly via S. 21(1) Parties to Offence and/or S. 23(1) Accessory After the Fact of the *CCC*.

8. Details of the **2017-2018**, multi-faceted, severe #TDVCA (orchestrated and executed by Kiska and his many legal-judicial accomplices), that intensified following:

    a. Ontario's Superior Court of Justice ("SCJ") judge Darlene K. Summers' decision filed as Kiska v. Moore, 2017 ONSC 6872 (CanLII) which 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 Sean & Cate

    is described at paras. 33-51 of Andeé's civil action CV-23-00061855 against the Children's Aid Society of Ottawa ("CAS").

9. Details of the **2019-2020**, multi-perpetrator, judge-incriminating torts and/or crimes that Andeé and/or Sean & Cate have endured can be gleaned from events including, but not limited to:

    a. Andeé's civil action against 2019 Victor Vallance Blais LLP ("VVB", who were serving Kiska's best interests the entire time) which has been dragged out to near expiration by Cavanagh LLP ("Cavanagh") lawyer Susanne Sviergula and Ontario SCJ judge Sally Gomery[8];

    b. Andeé's 2019 Mail Campaign which began while she was cruelly detained at the Ottawa-Carleton Detention Centre ("OCDC") following:

        ✓ false allegations of criminal harassment made by Kiska so he could, among other things, have the FC-15-2446 long-awaited divorce trial cancelled by former CAS-employed lawyer Tracy Engelking ("Engelking"),

        ✓ among other things, negligent investigation and making of false documents by Ottawa Police Services Board ("OPSB"),

[8] who has since recused herself from Andeé's civil matters due to due, among other reasons, obvious bias

- ✓ among other things, malicious prosecution and perjury by Ottawa's Crown Attorney's Office and,
- ✓ likely, guidance provided to Kiska by the CAS[9] so, the awarding of sole custody and access of Sean & Cate to Kiska could be orchestrated;

c. the scandalous responses from both Ontario's Office of the Independent Police Review Directorate ("OIPRD") and its Law Society of Ontario ("LSO");

d. Andeé's ***initial*** civil action against Kiska and crooked Quebec-based psychiatrist Paule Kemgni ("Kemgni") who colluded in order to:

- ✓ have Andeé's house emptied,
- ✓ further the alienation of Andeé from Sean & Cate and
- ✓ further document false allegations regarding Andeé's mental resilience and fortitude; deeming them "something-other-than-blessed" … ***again***; and,

e. details of the 20201110 CAS Summary Judgment Motion scheduled by Engelking for Kiska's and CAS's benefit; and, incriminating SCJ-positioned judge Mary Fraser.

10. Details of the **2021-2022**, multi-perpetrator, judge-incriminating torts and/or crimes that Andeé and/or Sean & Cate have endured can be gleaned from events including, but not limited to:

a. the scandalous performance of ***five*** SCJ Divisional court-positioned judges (Matheson, Perrel and Kristjanson + Lederer and Copeland),

b. Andeé's civil action against the CAS noted at para. 8 b above,

c. Andeé's work-in-progress civil action CV-23-00061854 against Galarneau & Associates Professional Corporation ("Galarneau"),

d. Andee's civil action CV-21-00086203 against the group that stole ***all*** of her and Sean & Cate's priceless possessions and childhood memorabilia—while she was

[9] Arguably, committing crime including, but not limited to, Mischief and Counselling others to commit crimes including, but not limited to, Mischief.

maliciously detained as noted at para. 9 d above—which also incriminates SCJ-positioned judge Ryan Bell ("Bell"),

e. Andee's illegally-obtained, unlawful, child-abusing, SCJ-judge-Jonathan-Brunet-incriminating 20220524 Probation Order; an Application to review for which employees at the Ottawa courthouse (ie. criminal branch) have obfuscated for months and

f. Andeé's civil action CV-22-00089804 against shysters at Addelman Baum Gilbert Robinson LLP ("Addelman") and Snir Law Office ("Snir")[10]—which is ***also*** being obfuscated by the Ottawa courthouse's civil branch[11].

11. It's not as if Andeé ***didn't*** attempt to mitigate the impact of the perpetual torture, trafficking and terrorism: she reported the #TDVCA Municipal Mafia to OPSB ***multiple*** times including, but not limited to:

a. 20211024, when Andeé spent 18 minutes seeking advice from OPSB on exactly how to report the syndicate;

b. 20211031, when Andeé filed her complaint as per instructions. She:

✓ attended the station in person with her summary of testimony + evidence binder ("STEB"),

✓ spent about 15 minutes:

– describing the type of crime she wanted to report to the OPSB gatekeeper,

– was told "it was [OPSBs] legal requirement to investigate" and

– reviewed the 8 tabs of her STEB[12] which included:

- a Cover: Summary Illustration of Ottawa's Municipal Mafia,

[10] currently being harboured by accomplices at Nelligan O'Brien Payne LLP ("O'Brien") and Gardiner Roberts LLP ("Gardiner Roberts"), respectively

[11] including, but not limited to, SCJ-positioned judge Sylvia Corthorn

[12] part 1 and part 2, (excl. 2013 back cover) which the OPSB gatekeeper ***refused*** to accept; claiming an investigator would collect it later

- Tab 1: pfc.ROCKS[13] screenshot of The Ottawa Pipeline (which primarily targets children) and The Ottawa Ticket (which primarily targets adults),
- Tab 2: pfi.ROCKS Visitor Analysis (evidencing use of IP addresses for target labelling and terrorist communications, internationally),
- Tab 3: Andeé's 20211015 Factum re: DV-512/21 when she sought leave to appeal SCJ-positioned judge Pamela MacEachern's scandalous family court decision,
- Tab 4: Andeé's 20210716 Factum re: DV-088/21 when she brought a motion to adduce fresh evidence for her appeal of SCJ-positioned judge Mary Fraser's scandalous CAS-related decision,
- Tab 5: Andeé's 20210916 Factum re: DV-088/21 when she appealed SCJ-positioned judge Mary Fraser's scandalous CAS-related decision with a mountain of undeniable evidence against Kiska and his multiple accomplices,
- Tab 6: the link to SAQOTU Inc.'s corporate dropbox account which contained ALL of Andeé's criminal and civil court-related documents,
- Tab 7: a draft list of the perpetrators (now, outdated and still incomplete and/or growing) involved as well as the types of crime being committed and

[13] pfc.ROCKS is the site Andeé built following the malicious 20210407 re-arrest when she was extorted into hiding all of the pfi.ROCKS evidence at twb.ROCKS and prevented from using pfi.ROCKS via an illegally-obtained, unlawful 20210409 Release Order orchestrated by OPSB's Cheryl Cross and Crown prosecutor Malcolm Savage.

- Tab 8: a draft auto-biography; albeit one that needs a serious update and edit due to Andeé's post-draft experiences and revelations including, but not limited to, her awareness that:

(1) Canada is merely a corporation that serves the Crown Corporation,

(2) China has ***significant*** influence over our Canadian rules and regulations,

(3) World Health Organization ("WHO") is one sick and twisted entity,

(4) World Economic Forum ("WEF") which is executing initiatives to secure a new world order ("NWO") and one world government ("OWG") as stipulated in Agenda 21 has penetrated the Canadian government and is currently driving crimes against humanity via Policy Horizons Canada,

(5) Maximus Inc.—a for-profit entity to which governments outsource services that range from A to Z—has begun to establish footholds in both British Columbia and Ontario,

(6) the ***entire*** field of psychiatry is a hoax—one that was perpetuated by demon-managed carcass ("DMC") "Sick-mind Fraud" and

(7) evolution is a hoax too; and,

– one's of Andeé's business cards and a pfi.ROCKS button!

✓ spent about 2 minutes reviewing her 1-page complaint introduction for accuracy,

✓ spent about 5 minutes filing her 1-page complaint introduction and attempted to include the STEB,

✓ spent the following two weeks waiting for an investigator to call; not unlike her wasted efforts to report the theft of ~$500,000 in personal possession in 2019.

In nutshell, OPSB outright refused to accept Andeé's evidence binder when she filed complaint #21-280183 and then closed the file without investigation due to … a lack of evidence!"

c. 20230331, when OPSB dispatched "Vanier's finest" who literally couldn't have been a better demonstration of the level of incompetence and/or criminal complicity that is taxpayer-funded OPSB.

12. Details of the **year-to-date 2023** torture, trafficking and terrorist activities that Andeé endures to this day can be gleaned from:

a. Andee's newspaper-worthy, #TDVCA Municipal Mafia-incriminating response to the vexatious, 20230131 vexatious Application filed by Ottawa Police Services Board ("OPSB")[14]—which is ***also*** being obfuscated by the Ottawa courthouse's civil branch[15]—and being published under the title "The Darkumentary".

b. the 20230413 Fraud complaint opened by the RNC and sent to OPSB for investigation, that OPSB ***refused*** to investigate as …. they deemed it a civil matter![16]

c. Andeé's pending Civil Action against Ontario's Ministry of the Attorney General ("MAG")–being framed as a screenplay called #Mummygate–which includes Crown-nailing scene "The Smoking Gun (of '21)".

13. In fact, by 20230914, tens of thousands of pages of evidence were already conveniently located for NRPS on Andeé's corporate website which also included an MS Excel-based, 300+ row, searchable table of evidence.

14. Seriously, there was practically no investigation work required to start making arrests: Andeé had served it all up on a silver platter!

15. On 20230915, Andeé contacted NRPS about the long-term crime that remained "in-progress".

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[14] following a failed extortion attempt executed by OPSB accomplice Michelle Doody of Borden Ladner Gervais LLP ("BLG")

[15] including, but not limited to, SCJ-positioned associate judge Marie T. Fortier

[16] while simultaneously attempting to shut her out of civil court by having her declared vexatious

16. NRPS immediately sent two officers, MacIntosh (badge #9654) and D'Elia (badge #9767), and a "crisis worker" named Jess who heard Andeé's 22-minute testimony[17]; but, would not review any evidence or take a statement. From that exchange, NRPS file #23-104046 was allegedly generated.

17. For the next 56 days, Andeé followed up ***multiple*** times to find out if her complaint had been assigned to a detective: it had not.

18. On 20231111, Andeé's Quest-employed caseworker[18] asked, "What's your plan for housing?".[19]

19. Frustrated, Andeé immediately placed ***another*** follow-up call to NRPS and within a few hours, she was informed by someone who self-identified as NRPS "Staff Sergeant Lantz" that file #23-104046 had been assigned to NRPS Constable Michael Brown[20] ("Brown"): he advised that Brown would contact Andeé on 20231112 between 13:00 and 15:00.

20. As expected, Brown was a "disappointment" as he refused to investigate anything (see Section D paras. 36-49 below for Brown-related allegations).

21. Prior to contacting the Office of the Independent Review Directorate ("OIPRD"), Andeé sought assistance from NRPS' Professional Standards Unit ("PSU") without success (see Section E paras. 49-59 below for PSU-related allegations).

B. NRPS' Constable Casey Tennant

22. Due to the non-stop persecution in Ottawa, Andeé remained out-of-Canada to build her whistle-blowing site https://pfi.rocks until 20200820 when, nearly broke, she was forced to return to the cesspool of Ontario.

[17] She left several messages with Constable MacIntosh and spoke with the NRPS gatekeepers who answer the phone.
[18] Andeé was assigned this caseworker during her 20230921-20230927 stay at Canadian Mental Health Association's Safe Beds St. Catharines shelter and has copied Safe Beds' staff on key files since her departure so they remained aware of the degree of mental torture which she continues to endure without meaninful assistance from anyone other than the advocates employed by Niagara Falls' YWCA womens shelter.
[19] What's Andeé's plan for housing? Gosh, maybe get Kiska arrested and their marriage annulled for extreme cruetly? Convert 1244 Lampman Crescent—her ~$2,000,000 matrimonial home of which she ***still*** owns half—into a homeless shelter and move somewhere that isn't fully infiltrated by DMCs?
[20] Badge #9754

23. After spending 14 days in a Red Cross-managed quarantine facility in Toronto, Andeé was driven to the St. Catharines YWCA Women's Shelter ("St-C YWCA") where she sought shelter ***and*** police assistance.

24. At some point between 20200903 and 20200918, Andeé attended the St. Catharines police station in an attempt to submit a complaint against the Ottawa-based #TDVCA Municipal Mafia noted within paras. 8-12 above.

25. Andeé was directed to use a phone in the entrance to contact NRPS who would dispatch an officer to take her statement.

26. Shortly thereafter, NRPS Constable Casey Tennant ("Tennant") arrived at St-C YWCA with a female officer.

27. Instead of taking her statement, however, Andeé was handcuffed and taken into custody for allegedly breaching her illegally-obtained, unlawful 20200131 bail conditions that were crafted by Ottawa Crown prosecutor Malcolm Savage.

28. While detained, Tennant realized that the warrant for Andeé's arrest was limited to 400 km from Ottawa; so, he released her and returned to the St-C YWCA.

29. As Tennant refused to take ***any*** statement, Andeé e-mailed to him evidence and links to her whistle-blowing site in an attempt to convince him.

30. Meanwhile, Andeé ***again*** prepared for a 20200922 Bail Review, hoping to have the torturous, non-Communication with Sean & Cate #1 condition removed—if not the ***entire*** matter tossed out completely on the basis of cruelty and malicious prosecution by Malcolm Savage (who previously fearlessly committed crime in Andeé's presence with reckless abandon during the scandalous 20200226 Judicial Pre-Trial (where he was salivating over his "bought & paid for" Not Criminally Responsible ("NCR") Opinion from the Royal Ottawa Mental Health Centre ("ROMHC") and the 20200131 Bail Hearing (following eviction by bail house managing pimp, Lorie Fuentes) when he attempted to criminalize alcohol consumption too).

31. Not once did Tennant respond to Andeé's e-mails or voicemails.

32. The amount of evidence that ***was*** available for Tennant's review in September remains available at SAQOTU Inc.'s original Archives section[21,22]; one he never even bothered to ask Andeé about.[23]

33. Then, on 20200919, Tennant arrested Andeé ***again*** after she was tossed from the St-C YWCA for recording an advocate who remained hunched over her computer instead of assisting a client whom Andeé thought was in distress.

34. On 20200922, the date that Andeé was scheduled to attend her Bail Review noted at para. 30 above, Tennant finalized his false, defamatory police report which contained severely damaging errors, omissions and malicious obfuscation.

C. Ottawa's #TDVCA Municipal Mafia: Testimony + Evidence served up on a Silver Platter

35. Andeé's 22-minute[24] testimony regarding Ottawa's #TDVCA Municipal Mafia could not have been more clear:

    a. from 00:25-01:33, Andeé identified herself as a whistle-blower on organized crime;

    b. from 01:34-02:18, Andeé explained by she was broke and referenced former landlady Shelene Crawley as the individual responsible for the most recent theft and the inaction by the Royal Newfoundland Constabulary ("RNC") for that event and in general (not unlike the OPSB's *modus operandi*);

    c. from 02:19-05:59, Andeé described OPSB's involvement in the 2019 Eviction Scam, OPSB's extortion and additional crimes; and, much, ***much*** more;

[21] Andeé's summary of events documented 20200827 evidenced judicial crime and more.
[22] Andeé's summary of events documented 20200828 evidenced judicial crime and more.
[23] Andeé could have easily described and evidenced the crimes committed by SCJ-position judges Engelking and Marc Smith ("Smith"), multiple CAS-related perpetrators, OCL-enabled Patric Senson and Debra Scholey, Bell Baker LLPs Wade Smith and Christine Hammond and, of course, Kiska. She could have also described the court-enabled domestic terrorism evidenced at twb.rocks as well as the international trafficking network.
[24] Speaking of 22 minutes, in addition to damages sought, Andeé would like to perform a skit for CBC with Sean & Cate. Is such an order tenable at law?

d. from 06:00-09:13, Andeé informed NRPS how she had involved RCMP's Matt Peggs ("Peggs") in 2022 and the RNC in 2023;

e. from 09:14-13:59, Andeé described how the crimes include torture, trafficking and terrorism;

f. from 14:00-14:55, Andeé described Jack Pendergrass's exposure of Maximus Inc. and its involvement in taxpayer-funded torture, trafficking and terrorist activities;

g. from 14:56-20:19, Andeé requested assistance and was assured NRPS would respond; and,

h. from 20:20-21:35, James Scott MacKillop's exposure of Policy Horizons Canada and its plans to implement: Digital ID, Central-based Digital Currency ("CBDC"), Biodigital Convergence and Bio-surveillance without Canadians being fully aware that these initiatives are designed to, at a minimum, provide a world-wide government ***complete*** control of whatever's left of the humanity.

D. NRPS' Constable Michael Brown

36. On 20231112—in advance of the "scheduled" 20231112 13:00-15:00 "meeting"—at 10:55, Andeé left for Brown a 02:40 message which directed him to several pages on her whistle-blowing site; specifically,

a. from 00:41-01:03, Moore vs. CAS CV-23-00061855 (which evidences crime committed by the CAS),

b. from 01:04-01:20, The Smoking Gun (of '21) (which evidences crime committed by Ottawa Crown prosecutors and Ontario judges) and

c. from 01:21-01:30, The Darkumentary (which evidences involvement of OPSB in organized crime).

37. In that message, from 1:30-01:51, Andeé also informed Brown that due to the nature of the crime, Ontario Provincial Police ("OPP") and the Royal Canadian Mounted Police ("RCMP") would need to be involved.

38. In that message, from 01:52-02:05, Andeé ***also*** informed Brown that—on 20220718, prior to her 20220801 escape from Ontario for a year to build the file—RCMP's Matt Peggs[25] was informed of the #TDVCA Municipal Mafia: she was to inform him when her materials were better organized.

39. This update was done:

    a. on 20230713 from 16:07 to 16:16 with an unidentified woman from Peggs' office and

    b. on 20230920, when Andeé also detailed her proposed self-initiated "Witness Protection Program" plans, ***if*** required;

    however, it became clear on 20231119 (see para. 45 below) that Brown did not believe Andeé[26]. Brown simply mocked her with an e-mail laden with errors, omissions, malicious obfuscation and … cant[27].

40. On 20231112—in advance of the "scheduled" 20231112 13:00-15:00 "meeting" which never occurred—at 15:04, Andeé left for Brown a 02:23 message which directed him to several pages on her whistle-blowing site; including, but not limited to:

    a. from 01:05-01:47, The Smoking Gun (of '21) (which evidenced crime committed by Crown prosecutors and Ontario judges) and

    b. from 01:48-02:00, Moore vs. CAS CV-23-00061855 (which evidenced crime committed by CAS, OCL, OCJ, SCJ and Bell Baker LLP-positioned terrorists).

41. On 20231112, beginning at 17:11, Andeé and Brown spoke for approximately 29 minutes as he queried her on the nature of her complaint.

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[25] Matt Peggs' phone number was provided to Andeé by a former under-cover, RCMP officer who remains in hiding as someone "blew his cover".

[26] It's possible that Brown only heard the 4-minute audio recording of Andeé's 20230917 exchange with some bizarre dispatch operator when he went through her evidence-laden YouTube channel.

[27] Educating the court on the manner in which cant has been updated for online use is beyond the scope of this pleading.

42. Prior to ending the call, Brown informed Andeé that he was too busy with a "sudden death" that "[he] needed to finish it".[28]

43. Brown also stated that he would be off the following week but would speak to his Staff Sergeant and try to "expedite" "the file".

44. On 20231118 at 09:19, as Andeé waited patiently for Brown's return call, she sent to him the username and password for her back-up site https://twb.rocks/careers/; so they could review some of her evidence over the phone; however, Brown did not respond.

45. On 20231119 at 11:44, Brown informed Andeé that he had decided to take the 18th off—via his first cant-laden e-mail which referenced, among other things:

    a. Liam Neeson's human trafficking-related movie Taken (ie. takin = Taken),

    b. a *Mental Health Act* apprehension threat (ie. form = Form 1) and

    c. a murder threat (ie. frankly = François D'Aoust[29] = murdered Ottawa rapper FTG Metro).

46. Brown clearly was not aware that Andeé had been studying the machinations of "New Age" Stalking & Harassment syndicates since being alerted to their existence in 2017.

47. Andeé ***immediately*** recognized Brown's cant as she is well-versed in how it is used by, not only law enforcement officers and the legal-judicial system, but the gang-stalking community, "hitman management" and media as well.

48. On 20231120 at 19:36, Andeé attempted to escalate the matter to Brown's supervisor without success as the gatekeeper who answered the phone, assured her that Brown's supervisor was well aware of the file and "[if she wants to make a complaint she should go to the OIPRD]".[30]

49. Following a couple of additional pieces of mockery from Brown, on 20231128, Andeé informed him that his gaslighting did not negate NRPS' jurisdiction nor obligations.

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[28] Then, the "fun" began as Brown insisted on demonstrated his love for cant (see example at para. 45).
[29] D'Aoust previously made a point of directly informing Andeé that pursuing her legal matters was "a Pandora's Box").
[30] Note that Andeé erred in quoting the file number by stating it was #23-106046 instead of #23-104046. Unless 2,000 new NRPS police files had been opened since 20230915, whoever answered the phone should have recognized her error.

E. NRPS' Professional Standards Unit

50. Aware that contacting NRPS's PSU should be done ***prior*** to filing a complaint with OIPRD[31], on 20231122 at 11:20, Andeé left a message for PSU requesting someone take a harder look at her police complaint.
51. Meanwhile, on 20231124 at 11:35, Andeé included Brown in ***another*** evidence-laden e-mail.
52. ***26 minutes later***, at 12:01, Andeé sent Brown ***another*** evidence-laden e-mail and asked him if he realized why his 20231119 11:44 response (noted at para. 45 above) was "beyond ridiculous".
53. ***20 minutes later***, at 12:21, Andeé left ***another*** message for NRPS's PSU which stated:
    a. from 0:56-01:19, that she had mis-identified the file number in her previous message and properly identified the alleged file number (23-104046), the initial officer and the assigned "detective",
    b. from 01:20-01:47, that Brown was ignoring undeniable evidence and refusing to investigate her complaint,
    c. from 01:48-01:55, that a civil action would be part of her next course of action and
    d. from 02:20-02:26, that the matter remained a crime in progress.
54. ***35 minutes later***, at 12:56, Andeé received ***another*** cant-inspired e-mail which stated

> "...After reviewing the report number, you indicated in your message, your best course of action would be to make a complaint to the OIPRD with respect to the Ottawa Police Service..."[32]

55. ***87 minutes later***, prior to following NRPS PSU's pro-organized-crime direction to [walk away now and] complain about OPSB to OIPRD, Andeé sought confirmation. of their instructions.

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[31] Justice delayed is justice denied. Why risk waiting months just to have OIPRD simply return the matter back to the uselessness of NRPS' PSU as they did with the assaulted exotic dancer?

[32] Describing the manner in which cant is used in technology-assisted stalking and harassment is beyond the scope of this pleading.

56. Specifically, Andeé stated:

> "Kindly confirm that the report to which you are referring below:
>
> a. is the one opened by NRPS Cadre #9654 Brian MacIntosh on or about September 15, 2023,
>
> b. is the one assigned by Staff Sargeant "Lantz" or "Lance" to Constable Michael Brown on or about November 11, 2023 and
>
> c. is the one which NRPS is refusing to investigate despite the fact that today it received additional testimony and evidence related to provincial-level and federal-level crime (which remains in progress) as evidenced by:
>
> ✓ attachment #1, today's 11:35 e-mail to Quebec Legal Aid and
>
> ✓ attachment #2, today's 12:01 e-mail to the Ottawa courthouse (and other Ottawa-based "Municipal Mafia" participants)."

57. On 20231125 at 21:19, Andeé alerted NRPS Chief Bryan MacCulloch that NRPS was being sued.

58. On 20231128 at 01:50, Andeé ***again*** asked for confirmation from PSU; however, at 03:07, the only response she received was more cant via an anonymous, cant-laden "Twitter follow".

59. Instead of requesting a meeting with Andeé and commencing an investigation, NRPS chose to ***not*** respond and allowed this civil matter to proceed; perhaps, its confidence stems from its own connections with Ontario's judicial services.

60. At time of writing, 20231129 22:50, the NRPS PSU has yet to confirm anything.

61. As noted above at para. 49 above, however, Brown could not stop lying—a top indicator of sociopathy and common amongst law enforcment, doctors, lawyers and judges: he ought to be aware of his obligations to investigate.

F. LEGAL TESTS

62. The degree of NRPS' liability is so severe, establishing the manner and multiple ways in which NRPS has met the multiple tests required to establish a damages award would render this pleading not merely a novel; but, an entire mini-series[33].

63. In light of direction *previously* provided by the court—see para. *77* below—the manner in which each of the legal tests have been met will be evidenced (as part of the Discovery Plan) during a third-party records Application not unlike the ones:

    a. obfuscated by the CAS from July 2019 to present,

    b. submitted to OCJ/SCJ Ottawa for May 2021,

    c. submitted to SCJ St. John's in February 2023,

    d. obfuscated by OPSB ***twice*** (so far) throughout 2023,

    e. ignored by Bell Baker's Cheryl Hess and/or Katherine Ghadaksaz and

    f. obfuscated by Quebec Legal Aid (for the benefit of Dr. Paule Kemgni and the Suroit Hospital) on 20231128.

SPACE IS INTENTIONALLY LEFT BLANK;

[33] Prior to the OPSB/CAS-assisted court-napping of Sean & Cate in 2019, people who described Andeé's situation as a "living nightmare" suggested she write a book. While her plan in 2013 ***was*** to write "How I Bullied the Bully out of my Husband" (of which coercive-controlling Kiska and The Ottawa Hospital ("TOH") were aware, or ought to have been aware), by 2018 her mentor—top Ottawa-based psychologist Dr. Iris Jackson—suggested she write a screenplay instead. Though only in early stages, a logline for #Mummygate has already been published: "A devoted mum attempts to divorce a sociopath linked to a massive, government-enabled, crime syndicate and finds the dark humour in their satanic errors, omissions and malicious obfuscation."

G. CONCLUSION

64. Collusion between law enforcement, Crown prosecutors, the CAS, the OCL and a seemingly ***infinite*** number of career-criminal lawyers/judges, physicians and politicians that serve only to torture, terrorize and traffic devoted parents through the various branches of Ontario's legal-judicial system—and emotionally and/or psychologically abuse their children—needs to stop: the perpetrators are so emboldened that they brag about it with their cant-laden e-mails and share collusion strategies at events such as Canada's annual "Domestic Violence Con".

65. During both September 2020 and September-to-November 2023, NRPS IBD'd Andeé's irrefutable testimony and evidence of years of domestic violence, child abuse and taxpayer-funded torture, trafficking and terrorism.

66. They believe their sociopath mindset—which lacks human compassion, empathy or even sympathy—renders them superior; however, they are fully disabled[34].

67. On 20231129, Andeé proceeded with her complaints to the OIPRD about ***both*** the NRPS and the OPSB; however, their involvment[35] in organized crime needs to be exposed and punished. If there are no criminal avenues available to victims of these entities, then the only remedies available are through civil court and punitive damage awards.

68. It would be in the public interest if ***both*** the NRPS and OPSB were be suspended as well: this event would highlight that the normalization of organized crime has saturated society to such as severe degree that—when Andeé phoned NRPS to simply confirm that the department ***not*** responding in any meaningful way (as noted at paras. 50-61) was the Professional ***Standards*** Unit (not the Professional ***Conduct*** Unit as reported)—after hearing her testimony, whoever answered the phoned advised Andeé to simply meet with a psychiatrist.

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[34] and/or possessed: ***anyone*** can craft a cheeky e-mail or legal document that mocks an adversary. Sociopaths seem to have ***zero*** clue that EQ + CQ > (individual IQ) and they're incapable of discerning truth due to, among other things, their collective igorance of psyche-osis.

[35] even if only through S. 23(1) Accessory after the fact and/or S. 21(1) Parties to Offense

69. Alleging that Andeé suffers from ***any*** mental illness when she consistently demonstrates mental resilience and fortitude while being perpetually mentally tortured is both typical and preposterous: if this is the manner in which Andeé is treated by Kiska and the #TDVCA Municipal Mafia, imagine how they have treated Sean & Cate—two children without the maturity or experience to realize that their biological father is a pathological liar and a narcopath; and, that most participants in the legal-judicial system are as well.

70. At para. 268 of the 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.

71. Although Kiska's Crown-positioned accomplices dropped ***most*** of its 14 bogus charges—after they ensured 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 if NRPS' Casey Tennant chose a different course of action.

72. ***But for*** the negligent, careless, tortious, malicious and/or criminal behaviour of the NRPS, Andeé would have celebrated her daughter's 16th birthday ***with*** her and her brother on 20231130—assuming they're still alive; instead, she:

    a. requested ***another*** fee waiver certificate and issued ***another*** statement of claim,

    b. attended an appointment with a Quest-associated nurse practitioner who is to help Andeé apply to the Ontario Disability Support Program ("ODSP")[36],

    c. went to the Project Share food bank to apply for a gift certificate for No Frills,

[36] As recommended by Ontario Works and the Niagara YWCA Women's Shelter

d. returned to her donor-funded, shared, shelter room[37] in Niagara awaiting approval for a private room.

73. 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***.

74. Due to the actions and inactions of the NRPS—including, but not limited to, ***not*** reporting Kiska or the #TDVCA Municipal Mafia to the OPP or the RCMP as required—Andeé also continues to endure: childlessness, homelessness, poverty; and, humiliation, demonization, ostracization, marginalization and unemployability which continues to this day.

75. One can only imagine how many ***other*** families the NRPS has destroyed since September 2020 as it IBD'd evidence of domestic violence and ripped the safe, devoted parent from the lives of vulnerable children; accordingly, damages awarded for NRPS' despicable involvement in the destruction of family would also be used to assist ***other*** NRPS targets in their long journey of healing.

76. As of **20231129,** the NRPS has made ***no*** attempt to mitigate the impact of this civil action on their taxpayer-funded entity: they are as fearless[38] of any consequences as is Kiska.

77. 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, Kiska v. Moore 2017 ONSC 6872 (CanLII), which permits Andeé to seek ***multiple*** damages from Kiska for violations of both cvil law and the *Criminal Code* of Canada in a … FAMILY … COURT … SETTING.[39]

November 30, 2023

Deirdre Moore, c/o YWCA Women's Shelter
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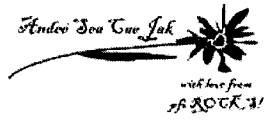

[37] while she remains co-owner of a ~$2,000,000 home on the water in Ottawa
[38] In addition to Kiska and other #TDVCA Municipal Mafia members, NRPS' members should ***also*** be "put under glass" for intense study.
[39] that is, ***if*** the court-positioned members of Doug Ford's #TDVCA ***Provincial*** Mafia ***ever*** permit her to schedule a divorce trial

Court File No. CV-23-00061902-0000

Deirdre Moore	vs.	Regional Municipality of Niagara Police Services Board

Deirdre Moore vs. Regional Municipality of Niagara Police Services Board

ONTARIO

SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT 59 CHURCH STREET

ST. CATHARINES, ONTARIO L2R 7N8

STATEMENT OF CLAIM

Plaintiff:
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