draft TSEF insert

Part 2 - Respondent's Information

[3] ISSUES

1.	Validity of Application	6.	Violations of the Criminal Code of Canada demonstrated throughout separation process: - Fraud (3 counts) * - Criminal defamation (ongoing) - Criminal harassment (ongoing) - Mischief (ongoing)
2.	Custody and access of Children	7.	Violations of Civil Law demonstrated <u>prior to</u> the separation process: - Infliction of mental suffering and emotional distress - Breach of fiduciary duty - Defamation - Attempted parental alienation
3.	Restraining order	8.	Violations of the Criminal Code of Canada demonstrated <u>prior to</u> the separation process: - Criminal defamation - Criminal harassment - Mischief
4.	Exposure of Bad Faith demonstrated throughout separation process	9.	Other items due to exceptional circumstances including: - Demonstration of the degree of perjury utilized throughout the Court process - Identification of the level of deceit contained in written and verbal presentations made to the Court Summation of the costs directly related to the professional practices of Mr. Wade Smith and/or his firm BellBaker LLP Request for a compete psychological evaluation of the Applicant.
5.	Violations of Civil Law demonstrated throughout separation process: Infliction of mental suffering and emotional distress Breach of fiduciary duty (to children) Defamation Attempted parental alienation	10.	Other regular items including: - Spousal and Child support; the sharing of Children's Expenses

^{*}Evidence for second and third count acquired only after service of amended Answer therefore another amendment may be required, if permitted. See Tab 5 Exhibit A included here.

[4] WITNESSES – Must be completed fully

By naming a witness below, the party undertal without summons even if the party decides no list, including yourself.

Estimates for cross-examination should be pro

	Issue to be		
Name of Witness	addressed		
Deirdre Moore	All issues		
Dr. Judy Chow			
Dr. Deanna Mercer			
Dr. Daniel Saul			
Dr. Yoland Charbonneau			
Dr. Peter Kay			
Ms. Jessica Poloz			
Mr. Khamen Wood			
Dr. Drew Kingston			
Dr. Christopher Cardoso			
Dr. Shelly Huang			
Dr. Wendy Low			
Mrs. Karen Perry			
Mr. Douglas King	1/4		
Dr. Adrienne Matheson			
Mr. Stephen Tremblay	Intentional		
Ms. Viana Ibrahim	and/or negligent		
Ms. Cathy Cassidy-Gifford	infliction of		
Ms. Heather Simon	mental		
Mrs. Aisling O'Donnell	suffering and		
Ms. Mona Nesrallah	emotional		
Ms. Lynne Sylvestre	distress		
Ms. Dawna Gates	G.5.1.555		
Mrs. Dana Hunsberger			
Mrs. Ruth Clarke			
Mr. and Mrs. John Scarlett			
Mrs. Kerry Mortimer			
Ms. Amada Wilkes	1001		
Ms. Rizza			
Mrs. Sarah Merrett			
Mrs. Micheline Kerr			
Ms. Madalen Spnoyiannis			
Ms. Elyse Clements			
Mr. Richard Daly			
Mr. Pierre LeBel			
Mr. Steve Mortimer			
Extended Family + Others	defamation		
TOTAL TIME ESTIMATED			

in this

	In orosa
	In cross
l	
ŀ	
-	
-	
L	
Ī	
t	
ł	
1	
1	
1	
1	
1	
1	
1	
1	

EXPERTS

Name of Expert	Report	Witness to be qualified to give an	Qualifications
	served on	opinion on (be specific)	
Dr. Drew Kingston	_	Mental Illness:	PH.D., C.Psych
(or alternative)		Narcissism and the Cycle of Abuse	
Dr. Drew Kingston		Mental Illness:	PH.D., C.Psych
(or alternative)	_	A pathological liar vs. a narcissist vs. a	
		sociopath vs. a psychopath	
Dr. Iris Jackson	31-DEC-18	Mental Illness:	C.Psych
		- Defensive Dysregulation vs. Brief	
		Psychotic Disorder with known	
		stressors	ů.
		- Chronic mental illness vs. Situational	
		mental illness	
Nurse Susan McIntosh	w.	Psych ER Admission Process at TOH re:	PES, RN
	_	reliance on collateral information	
Dr. Daniel Saul		Psych ER Diagnostic Process at TOH re:	MD, FRCPC
	_	reliance on collateral information	
Dr. Yoland		- C&CB Hearing Preparation at TOH re:	
Charbonneau	4	reliance on collateral information	
	_	- CTO process at TOH re: reliance on	
		collateral information	
Dr. Peter Kay		- Use of Occupational Therapy for	
		treatment of mental illness at TOH	
	-	- Off-ward privileges granted to	
		patients of Ward D6 at TOH: process	
		and parameters	
Staff Sergeant	TO A SECTION	Technology-based harassment	Ottawa Police
François D'Aoust	_		Services—Technical
\$ 17 m			Investigations
Mr. Marc Payeur	No.	Tax treatment of dividends of	Chartered Accountant
	_	Canadian corporations	Certified Fraud
	. 1997	a other entry &	Examiner

tox relates

CPA, CA, CFE