

draft TSEF
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Part 2 – Respondent's Information

[3] ISSUES

1.	Validity of Application	6.	Violations of the Criminal Code of Canada demonstrated throughout separation process: <ul style="list-style-type: none">- Fraud (3 counts) *- Criminal defamation (ongoing)- Criminal harassment (ongoing)- Mischief (ongoing)
2.	Custody and access of Children	7.	Violations of Civil Law demonstrated prior to the separation process: <ul style="list-style-type: none">- 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 prior to the separation process: <ul style="list-style-type: none">- Criminal defamation- Criminal harassment- Mischief
4.	Exposure of Bad Faith demonstrated throughout separation process	9.	Other items due to exceptional circumstances including: <ul style="list-style-type: none">- 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 complete psychological evaluation of the Applicant.
5.	Violations of Civil Law demonstrated throughout separation process: <ul style="list-style-type: none">- Infliction of mental suffering and emotional distress- Breach of fiduciary duty (to children)- Defamation- Attempted parental alienation	10.	Other regular items including: <ul style="list-style-type: none">- 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.

Revised prior to distribution. Revision attached. TM

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EXPERTS

Name of Expert	Report served on	Witness to be qualified to give an opinion on (be specific)	Qualifications
Dr. Drew Kingston (or alternative)	—	<u>Mental Illness:</u> Narcissism and the Cycle of Abuse	PH.D., C.Psych
Dr. Drew Kingston (or alternative)	—	<u>Mental Illness:</u> A pathological liar vs. a narcissist vs. a sociopath vs. a psychopath	PH.D., C.Psych
Dr. Iris Jackson	31-DEC-18	<u>Mental Illness:</u> - Defensive Dysregulation vs. Brief Psychotic Disorder with known stressors - Chronic mental illness vs. Situational mental illness	C.Psych
Nurse Susan McIntosh	—	Psych ER Admission Process at TOH re: reliance on collateral information	PES, RN
Dr. Daniel Saul	—	Psych ER Diagnostic Process at TOH re: reliance on collateral information	MD, FRCPC
Dr. Yoland Charbonneau	—	- C&CB Hearing Preparation at TOH re: 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 François D'Aoust	—	Technology-based harassment	Ottawa Police Services—Technical Investigations
Mr. Marc Payeur	—	Tax treatment of dividends of Canadian corporations <i>for other entity & tax related issues</i>	Chartered Accountant, Certified Fraud Examiner <i>CPA, CA, CFE</i>