

ONTARIO

Superior Court of Justice, Family Court

(Name of court)

at 161 Elgin St., 2nd Fl., Ottawa, ON K2P 2K1

Court office address

Court File Number

FC-15-2446

Form 14A: Affidavit (general)

dated 21 August 2020

Applicant(s)

Full legal name & address for service - street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Jonathan Kiska
1244 Lampman Crescent
Ottawa, Ontario
K2C 1P8
Phone: (613)-794-5292

Lawyer's name & address - street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Wade Smith
Bell Baker LLP
700-116 Lisgar Street
Ottawa, Ontario K2P0C2
tel: 613 2373444 Fax: 613 2371413
wsmith@bellbaker.com

Respondent(s)

Full legal name & address for service - street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Deirdre Moore

Lawyer's name & address - street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Gonen Snir
Snir Family Law and Child Protection
85 Albert, Suite 800
Ottawa, ON K1P 6A4
Tel: (613) 762-2270
Fax: (613) 237-8146
info@snirlaw.com

My name is (full legal name) Gonen Snir

I live in (municipality & province) Ottawa, ON

and I swear/affirm that the following is true:

Set out the statements of fact in consecutively numbered paragraphs. Where possible, each numbered paragraph should consist of one complete sentence and be limited to a particular statement of fact. If you learned a fact from someone else, you must give that person's name and state that you believe that fact to be true.

1. My name is Gonen Snir, D.O.B. March 12, 1965. I am the counsel on records for Ms. Moore and I am doing this affidavit in supplement to the affidavit dated May 22, 2020 which was submitted to the court along with the Motion form requesting my removal from the records.
2. A few hours after Ms. Moore was served the motion materials and the affidavit dated May 22, 2020, she published the affidavit material on her web site, accessible to the world. Through this action, she waived client-solicitor privilege.

Exhibit A – E-mail dated July 9th, 2020 at 11:59 a.m.

3. Since that day, Ms. Moore has been terrorizing my office staff, defaming me, and trying to damage my reputation and my business.

Exhibit B – Email dated May 27, 2020 at 10:52 p.m. and Email Chain Dated August 11, 2020 – August 12, 2020

4. On June 19, 2020, Ms. Moore sent an email to Ms. Shelly Haiden "... that Are you aware ... that Gonen Snir is heading to prison? She then spread the email to my office staff, other lawyers, CAS, and the Ottawa police.

Exhibit C - Emails Dated June 19, 2020 at 4:46 p.m. and June 21, 2020 at 4:00 p.m.

5. On June 26, 2020, I receive a telephone call from Mr. Walter Kim from the Office of Public Guardian. He advised me that Ms. Moore approached him and advised him that I am mentally incompetent. On July 2, 2020, I received a copy of a letter from Mr. Walter Kim that is attached hereby as exhibit B.

Exhibit D – Letter from Mr. Kim date July 2, 2020

6. On August 10, 2020, and August 11, 2020, Ms. Moore presented herself to the trial coordinator as my agent. She then advised that she consents to my removal from the record. Although Ms. Moore advised that she had attached a Notice of Motion and affidavit to her consent, she has not done so.

Exhibit E – Email dated August 10, 2020 at 5:01 p.m. and email dated August 11, 2020 12:30 PM.

7. On August 11, 2020 Ms. Moore published on the internet a list of names of which she supports the arrest, charge and detention. This list includes Judiciary, lawyers, physicians, counsellors, school administrators, and etc.

Exhibit F – Print-out Web SAQOTU Inc. dated August 11, 2020

8. As the court can see there is no trust or any ability to work productively between myself and Ms. Moore. Her instructions and directions are not rational and are detached from reality. Her instructions to seek the custody of the children, while she has a criminal order prohibiting her from being in touch with them (both directly and indirectly) prove that she has no understanding of the reality of her situation.

9. Her instructions to file claims against every Judge that rules against her wishes, as well as every lawyer that represents an opposing side are not realistic. Further, the retainer agreement is limited to the Family Law file and the CAS file and does not include other claims.

Exhibit G – E-mail Dated May 4th, 2020 at 4:29 p.m.

10. Ms. Moore has been undermining, defaming, and slandering me amongst my colleagues, friends, and professionals. I am not willing to represent her under these conditions.
11. Ms. Moore is not able to provide me with reasonable directions and instructions to proceed with her files. She instructs me to request custody and access of the children while there is a restraining order against her which states that she cannot approach or be in contact with them. The children do not want to be in contact with her. The children are afraid of her.
12. Ms. Moore did not reveal her mental health issues. I found out after the arrival of disclosure from the Children's Aid Society. I learned that Ms. Moore suffers from Bipolar disorder, manic episodes, mania, and psychosis. Her mental health records are not from the last two years and despite her mental health challenges, in my opinion Ms. Moore is capable of presenting herself and her file in front of the court.
13. When retained, Ms. Moore did not advise me that the Society had advised her that they intended to request a Public Guardian and Trustee appointment for her.
14. Recently, Ms. Moore has presented herself as **MY AGENT**, and approached the Superior court in Kingston, requesting that all her matters from Ottawa be transferred to Kingston. She drafted motion material and submitted it to the Kingston court. On August 17, 2020, I received a call from the Kingston court questioning the motion material submitted by Ms. Moore on behalf of me

**Exhibit H – Notice of Motion dated August 12, 2020 provided to Kingston Court by Ms. Moore,
E-mail sent to Kingston Court on 14-16 August 2020**

15. Ms. Moore actions have not only created distrust between us, but she is damaging my professional reputation, and she is fraudulently representing herself as my Agent in front of tribunals and who knows where else.
16. The CYFSA matter is scheduled to be before the court for Assignment court on August 28, 2020, and most likely will be listed on the trial list. There will be no prejudice to the client if I am removed from the records. I can not seek reasonable instructions to represent her, and I am not able to do so due to the

client's mental health issues. I have exhausted all my resources to help her. She will need a Public Guardian and Trustee to manage her affairs. I can no longer afford to have Ms. Moore doing all she can to terrorize me and my office. The children are secured and in the possession of the father, even a slight delay in the proceedings to allow the Public Guardian to be appointed will not prejudice Ms. Moore. On the contrary, she may decide to seek help and assistance.

Exhibit I – Assignment court brief.

17. The Family law matter is on hold.

18. I request the court remove me from the records on both the family and the CYFSA file.

Sworn/Affirmed before me at
Ottawa

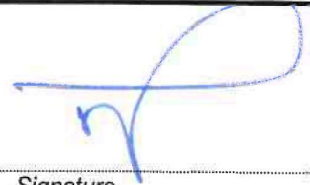
municipality

in the Province of Ontario

province, state or country

on

August 21/20
Date



Signature

(This form is to be signed in front of a lawyer, justice of the peace, notary public or commissioner for taking affidavits.)



Commissioner for taking affidavits (Type or print name below if signature is illegible.)



This is Exhibit A of the affidavit of
Gonen Emir signed before me, on 21 day of
August, 2020

Grant A. Lott



Gonen Snir <gonen@snirlaw.com>

Follow-Up || FW: I propose July 22 at 10:00, sharp; back-to-back line-up; no lunch break || FW: || RE: Re-SENT >No availability in June + a third Motion || RE: family & CYFSA motion

1 message

Deirdre Moore <dw.cceh@outlook.com>

Thu, Jul 9, 2020 at 11:59 AM

To: "Law, James (MAG)" <James.Law@ontario.ca>

Cc: "MacDougall, Tara" <Tara.MacDougall@casott.on.ca>, "Souder, Deborah" <Deborah.Souder@casott.on.ca>, "Stafford, Bonnie" <bonnie.stafford@casott.on.ca>, "Moir, Kristin" <kristin.moir@casott.on.ca>, "debora@scholey.ca" <debora@scholey.ca>, "Roskies, Shuah (MAG)" <Shuah.Roskies@ontario.ca>, "Clarke, Pauline (MAG)" <Pauline.Clarke@ontario.ca>, "patric.senson2@ontario.ca" <patric.senson2@ontario.ca>, "katherine.kavassalis@ontario.ca" <katherine.kavassalis@ontario.ca>, "Gervais, Daniel" <GervaisD@ottawapolice.ca>, "daoustf@ottawapolice.ca" <daoustf@ottawapolice.ca>, "Bender, Alex" <BenderA@ottawapolice.ca>, "Ministry of Children, Community and Social Services" <MinisterMCCSS@ontario.ca>, Ministry of the Attorney General <attorneygeneral@ontario.ca>, "info@snirlaw.com" <info@snirlaw.com>, "articling@snirlaw.com" <articling@snirlaw.com>, "admin@snirlaw.com" <admin@snirlaw.com>, Wade Smith <WSmith@bellbaker.com>, Christine Hammond <CHammond@bellbaker.com>

Good morning,

1. As per attached e-mail from new CAS lawyer, Deborah Souder (who appears to be just as much a sociopath as Tara MacDougall (as evidenced here: www.pfi.rocks/souder/), she refuses to provide to me the documents referred to in the 20200614 CAS Assignment Court Brief.
2. She has also refused to respond to my questions regarding witnesses for the upcoming CYSFA trial that were sent to Tara MacDougall on 20200703 at 19:51 p.m. as evidenced in attached e-mail "RE: 20200828 Assignment Court Documents ...". Clearly, the Court requires time estimates to schedule the upcoming trial; however, the CAS refuses to acknowledge this planning stage. (Wade Smith utilized this exact same strategy in July 2019 where he chose to accuse me of trespassing instead of providing an updated Trial Scheduling Endorsement Form: audio available at : www.pfi.rocks/smith/).
3. As we already know, Gonen Snir is a con artist (as evidenced here: www.pfi.rocks/snir/) who has committed multiple crimes against me and, similar to the past eight months, refuses to participate in my family law and CYSFA matters in any way unless it assists the CAS.
4. As per below, I suggested to you a date/time for Mr. Snir's motion six week's ago. He could easily have been removed from record by now and one can only assume that the reason he has not is:
 - a. To avoid having exposed in a civil hearing his criminal activity (detailed here: http://pfi.rocks/wp-content/uploads/2020/05/000019KJ_20200529_2330xx_EmailTo_James-LawGroup_re-July-22-Motions_SAQOTU_Ande%C3%A9-Sea-Cae-Jak-002.pdf, though some of the links have changed in the past six weeks) and/or
 - b. To trigger the automatic \$60,000 fee contained in his scandalous retainer agreement.

RE: 20200828 Assignment Court Documents || RE: Pardon? || ...



Souder, Deborah - Deborah.Souder@casott.on.ca

Deirdre Moore

into 2 snirlaw.com, articling@snirlaw.com, admin@snirlaw.com, MacDougall, Tara, Moir, Kristin, debora@scholey.ca, 6 others

Ms. Moore until such time as I receive an Order removing Gonen Snir as your solicitor of record or you serve and file with the Court A Notice of Change in Representation you are represented by counsel and I will only substantively respond to E-mails from him or release documents to him.

I will not respond to any further e-mails from you until either I receive the issued order referenced above or the Notice of Change in representation.

Deborah Souder

I have a simple solution to this nonsense: just as Brian Fisher was the agent for both the Children's Aid Society of Ottawa and its lawyer, Tara MacDougall, in 2019 as evidenced here: http://pfi.rocks/wp-content/uploads/2020/07/000060KJ_20190206_CAS_FC-19-CP-08_Order_JA-Parfett_Agent-Brian-Fisher_SAQOTU_Ande-Sea-Cae-Jak.pdf, I shall be acting as the agent for Gonen Snir until he has been removed from record. Should Ms. Souder continue to waste

7/10/2020

Snir Law Mail - Follow-Up || FW: I propose July 22 at 10:00, sharp; back-to-back line-up; no lunch break || FW: || RE: Re-SENT >No avail...

everyone's time as she incriminates herself, then I will seek an endorsement to force her co-operation in the same manner that Wade Smith has obtained endorsements-by-request in the past.

Accordingly, I will reach out to the Master's Office to bring the motion for Mr. Snir. To whom do you suggest I send my Motion materials?

Andee

Andee Sea Cae Jak, BBA (formerly Deirdre Ann Moore)

President, SAQOTU Inc. II President, AdvisorOnTrack Inc.

Mobile: 52-984-232-2194 (Mexico)

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From: Deirdre Moore <dw.cceh@outlook.com>
Sent: Friday, May 29, 2020 11:31 PM
To: Law, James (MAG) <James.Law@ontario.ca>; Gonen Snir <gonen@snirlaw.com> <Gonen Snir <gonen@snirlaw.com>; articling@snirlaw.com; admin@snirlaw.com; MacDougall, Tara <Tara.MacDougall@casott.on.ca> ; debora@scholey.ca; Roskies, Shuah (MAG <Shuah.Roskies@ontario.ca>; Wade Smith <WSmith@bellbaker.com>; Savage, Malcolm (MAG <Malcolm.Savage@ontario.ca>; Joseph Addelman <joe@abgottawa.com>; John Hale <john@halelaw.ca>
Cc: Andee Sea Cae Jak <asc.jak@pfi.ROCKS>; jwhite@pfi.rocks; Third Man Records <vault@thirdmanrecords.com>
Subject: I propose July 22 at 10:00, sharp; back-to-back line-up; no lunch break || FW: || RE: Re-SENT >No availability in June + a third Motion || RE: family & CYFSA motion

Agreed?

PS. James, whom do you intend to contact in the Master's Office regarding Mr. Snir's Motions? Will it be Kathy Estabrooks—or, someone else? I plan to follow-up.

From: Deirdre Moore <dw.cceh@outlook.com>
Sent: Friday, May 29, 2020 8:00 PM
To: Law, James (MAG) <James.Law@ontario.ca>
Cc: Gonen Snir <gonen@snirlaw.com>; MacDougall, Tara <Tara.MacDougall@casott.on.ca>; Wade Smith <WSmith@bellbaker.com>; debora@scholey.ca; lawsociety@lso.ca; Andee Sea Cae Jak <asc.jak@pfi.ROCKS>; jwhite@pfi.rocks; Third Man Records <vault@thirdmanrecords.com>
Subject: || RE: Re-SENT >No availability in June + a third Motion || RE: family & CYFSA motion

7/10/2020

Snir Law Mail - Follow-Up || FW: I propose July 22 at 10:00, sharp; back-to-back line-up; no lunch break || FW: || RE: Re-SENT >No avail...

Mr. Law,

Obviously, Mr. Gonen's request should not be heard as a procedural motion. This issue requires a full motion and it may not be accommodated via teleconference. Would you like to understand the reasons why?

In no particular order:

1. As per Family Law Rule 4(13), Mr. Snir should not have served evidence; however, as viewable at <http://pfi.rock5/202005p5-2-002/>, he did. Accordingly, he is guilty of violating section 126(1) of the *Criminal Code* of Canada Disobeying a Statute.
2. As per the Ministry of the Attorney General, the "commissioner's stamp" on the exhibits within Mr. Snir's libelous Affidavit is not remotely credible as a proper stamp: it *excludes* the location (required) and *includes* his name! Accordingly, he is guilty of, among other things, violating section 366(2) Making a False Document. (This conspicuous error also brings into question the credibility of Justice Mark P. Shelston ("Shelston") and Justice Tracy Engelking ("Engelking"); both whom have ignored my evidence and ruled against me in the past. Note that I have named them, as well as Justice Julie Audet ("Audet"), as witnesses for my defence in the my criminal matters (see attached 20200529 18:40 e-mail "Additional judicial officials to be sequestered for my defence").
3. If Mr. Snir wanted to bring a Motion by teleconference, then he should have utilized Family Law Rule 14(8) Motion by Telephone or Video Conference. As evidenced by this e-mail thread, he did not. This can be interpreted as his second count of Disobeying a Statute as well as support for my upcoming allegations that Engelking and Shelston are guilty of, among other things, violating Section 21(1) of the *Criminal Code* of Canada, Parties to Offense.
4. Mr. Snir served and filed two Form 14Bs (Notice of Motion) and two Form 14As (Affidavits); however, these forms are used to support Motions for Temporary Orders under the Family Law Rules. That which Mr. Snir seeks are not Temporary Orders under the Family Law Rules. He is seeking Orders under the Rules of Civil Procedure; specifically, Rule 15.04 (pasted below for your convenience).
5. As per Rules of Civil Procedure's Rule 16—Service of Documents—Mr. Snir's "service" of his ridiculous Motion materials by e-mail was improper: he has essentially claimed that he believes me to be a "mentally incapable person" (see paragraph 15 here: http://pfi.rock5/wp-content/uploads/2020/05/000015KJ_SCJ-FC-15-2446-Kiska-vs-Moore-Affidavit-May-22-2020.pdf). Accordingly, Mr. Snir's only option for service was the engagement of my Power of Attorney for both Health and Property*, Jack White (cc'd on this e-mail via vault@thirdmanrecords.com and jwhite@pfi.rock5).
6. Obviously, I am not a "mentally incapable person"; however, I will not reveal my current address to Mr. Snir. Accordingly, I consent to service by e-mail—assuming Gonen Snir acknowledges his criminal activity and my superior (to his) intellectual capacity as evidenced here: <http://pfi.rock5/to-gonen-snir-002/>.
7. Mr. Law, here is *Courts of Justice Act* Form 37A: Notice of Motion—perhaps you boys should try again. Teleconference is not an option; plus, I do not currently have a working phone and do not intend to get one until I re-install a land-line phone when I return to Ottawa in July; safely reunited with my two children, Sean and Cate.

Do let me know the dates and times of our three, upcoming, post-July 4, 2020 Motions.

Thank you

And   Sea Cae Jak

*of which he has been well aware for months.

(for your convenience)

Family Law Rules || RULE 4: REPRESENTATION

*This is Exhibit D of the affidavit of
Gonen Snir signed before me, on 21 day of
August, 2020*

Grant Schutte

M Gmail

Snir Law Mail - Not only will you be imprisoned,

SCANNED

Julie Ada <articling@snirlaw.com>

Not only will you be imprisoned,
1 message

Deirdre Moore <dw.cceh@outlook.com>

Wed, May 27, 2020 at 10:52 PM

To: Wade Smith <WSmith@bellbaker.com>, "tara.macdougall@casott.on.ca" <tara.macdougall@casott.on.ca>, "debora@scholey.ca" <debora@scholey.ca>, Joseph Addelman <joe@abgottawa.com>, John Hale <john@halelaw.ca>, "Savage, Malcolm (MAG)" <Malcolm.Savage@ontario.ca>, "Gonen Snir" <gonen@snirlaw.com> <Gonen Snir" <gonen@snirlaw.com>
Cc: Mary Kiska <mary.kiska@rogers.com>, kathleen moore <kmoore9523@yahoo.com>, "eileen@quickstartmedia.com" <eileen@quickstartmedia.com>, Andee Sea Cae Jak <asc.jak@pfi.rocks>, "jwhite@pfi.rocks" <jwhite@pfi.rocks>, Third Man Records <vault@thirdmanrecords.com>

We shall seek restitution through the Criminal Courts and damages through the Civil Courts.

Andee

Andee Sea Cae Jak, BBA (formerly Deirdre Ann Moore)

President, SAQOTU Inc. II President, AdvisorOnTrack Inc.

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Gonen Snir <gonen@snirlaw.com>

Confirmation || RE: FC-15-3446-0 Kiska v Moore / FC-19-CP-08-1 CAS v D.M. and J.K.: Request for Available Dates for Motion

1 message

Deirdre Moore <dw.cceh@outlook.com>

Wed, Aug 12, 2020 at 3:41 PM

To: Gonen Snir <gonen@snirlaw.com>

Cc: Annemarie Nault <admin@snirlaw.com>, "info@snirlaw.com" <info@snirlaw.com>, "WSmith@bellbaker.com" <WSmith@bellbaker.com>, "Deborah.Souder@casott.on.ca" <Deborah.Souder@casott.on.ca>, "debora@scholey.ca" <debora@scholey.ca>, Dan Jones <Dan.Jones@edmontonpolice.ca>, "daoustf@ottawapolice.ca" <daoustf@ottawapolice.ca>, "Bender, Alex" <BenderA@ottawapolice.ca>, "Law, James (MAG)" <James.Law@ontario.ca>, Ms Julie Ynes Ada Tchoukou <articling@snirlaw.com>

I wish Julie all of the best and will recommend that she be sequestered to your criminal trial as she is equipped with more than enough evidence to ensure that you are removed from society. I imagine that she will have a brilliant and rewarding career.

From: Gonen Snir <gonen@snirlaw.com>**Sent:** Tuesday, August 11, 2020 5:04 PM**To:** Deirdre Moore <dw.cceh@outlook.com>**Cc:** Annemarie Nault <admin@snirlaw.com>; info@snirlaw.com; WSmith@bellbaker.com; Deborah.Souder@casott.on.ca; debora@scholey.ca; Dan Jones <Dan.Jones@edmontonpolice.ca>; daoustf@ottawapolice.ca; Bender, Alex <BenderA@ottawapolice.ca>; Law, James (MAG) <James.Law@ontario.ca>; Ms Julie Ynes Ada Tchoukou <articling@snirlaw.com>**Subject:** Re: FC-15-3446-0 Kiska v Moore / FC-19-CP-08-1 CAS v D.M. and J.K.: Request for Available Dates for Motion

Dear Ms. Moore

For your information, Ms. Julie Ada was an articling student., she completed her articling position successfully and she is now a lawyer.

She is about to return to our firm and practice law as legal counsel.

I trust this is satisfactory. and you are joining in our best wishes to Ms. Ada in her promising career.

Gonen Snir

On Tue, Aug 11, 2020 at 4:41 PM Deirdre Moore <dw.cceh@outlook.com> wrote:

Are you aware of the Rules of Civil procedure? <https://www.ontariocourts.ca/scj/practice/rules-forms/>

Gonen Snir, by law, was supposed to continue to represent me until he was removed from record: he has not responded to an e-mail in MONTHS! His Motion materials are not remotely legal or proper; in fact, they are evidence of

his crimes committed against me. He is a new-to-Canada "con-artist". If he has convinced you to act on his behalf, be aware of Section 21(1) of the *Criminal Code* of Canada (Party to Offence) as well as Fraud, Defamatory Libel and Accessory after the fact. Unless you self-identify with the characteristics listed here: <http://pfi.rocks/website-content/understanding-predators/characteristics/>, I would prefer to *not* add you to my list here: <http://pfi.rocks/affidavits/>.

PS. Did his previous assistant, Julie, realize the risks associated with her precarious employment and quit? Are you her baited replacement?

From: Deirdre Moore <dw.cceh@outlook.com>
Sent: Tuesday, August 11, 2020 4:18 PM
To: Annemarie Nault <admin@snirlaw.com>; Law, James (MAG) <James.Law@ontario.ca>
Cc: Gonen Snir <gonen@snirlaw.com>; WSmith@bellbaker.com; Deborah.Souder@casott.on.ca; debora@scholey.ca; Dan Jones <Dan.Jones@edmontonpolice.ca>; daoustf@ottawapolice.ca; Bender, Alex <BenderA@ottawapolice.ca>
Subject: RE: FC-15-3446-0 Kiska v Moore / FC-19-CP-08-1 CAS v D.M. and J.K.: Request for Available Dates for Motion

Mr. Snir's Motion materials are 100% illegal. Deirdre Moore's Motion materials are not.

PS. Inspector Jones, watch how this plays out ... it's unbelievable.

From: Annemarie Nault <admin@snirlaw.com>
Sent: Tuesday, August 11, 2020 4:12 PM
To: Law, James (MAG) <James.Law@ontario.ca>
Cc: Gonen Snir <gonen@snirlaw.com>; WSmith@bellbaker.com; dw.cceh@outlook.com; Deborah.Souder@casott.on.ca; debora@scholey.ca
Subject: FC-15-3446-0 Kiska v Moore / FC-19-CP-08-1 CAS v D.M. and J.K.: Request for Available Dates for Motion

Dear Mr. Law,

We would like to schedule Mr. Snir's motion to be removed from the records, based on the endorsement of Justice MacEachern. Could you please advise of motion dates available, preferably in the last week of August? Please note that this motion is for both the family file (FC-15-3446-0) and the CYFSA file (FC-19-CP-08-1).

Please also advise on whether this motion will take place through teleconference or zoom?

Kind regards,

Annemarie Nault
Legal Assistant to Gonen Snir
Snir Family Law

8/12/2020

Snir Law Mail - Confirmation || RE: FC-15-3446-0 Kiska v Moore / FC-19-CP-08-1 CAS v D.M. and J.K.: Request for Available Dates for ...

85 Albert Street, Suite 800
Ottawa, Ontario K1P 6A4

Tel: 613 237-2673

Fax: 613 237-8146

Email: admin@snirlaw.com

--

Stay safe & Wash hands ! It will get better!

Gonen Snir

Barrister & Solicitor

85 Albert Street, Suite 800

Ottawa, ON, K1P 6A4

Office: +1 613 237 2673

Fax: +1 613 237 8146

email: info@snirlaw.com

This is Exhibit C of the affidavit of
Gonen Gmir signed before me, on 21 day of
August, 2020

Shant Silatke

6/23/2020

Snir Law Mail - A curiosity || FW: Are you aware ...



Snir Law Admin <admin@snirlaw.com>

A curiosity || FW: Are you aware ...

1 message

Deirdre Moore <dw.cceh@outlook.com>

Sun, Jun 21, 2020 at 4:00 PM

To: Wade Smith <WSmith@bellbaker.com>, "admin@snirlaw.com" <admin@snirlaw.com>, "articling@snirlaw.com" <articling@snirlaw.com>, "MacDougall, Tara" <Tara.MacDougall@casott.on.ca>, "debora@scholey.ca" <debora@scholey.ca>
Cc: "Gonen Snir" <gonen@snirlaw.com> <Gonen Snir" <gonen@snirlaw.com>, "articling@snirlaw.com" <articling@snirlaw.com>, "admin@snirlaw.com" <admin@snirlaw.com>, "Gervais, Daniel" <GervaisD@ottawapolice.ca>, John Hale <john@halelaw.ca>

How does your Group react to new information (that is stale-dated)?

From: Deirdre Moore

Sent: Friday, June 19, 2020 4:46 PM

To: shelly.halden@canada.ca

Subject: Are you aware ...

... that Gonen Snir is heading to prison? Some details are viewable here: <http://pfi.rocks/website-content/understanding-predators/specific-predators/gonen-snir/>

Andeé

Andeé Sea Cae Jak, BBA (formerly Deirdre Ann Moore)

President, SAQOTU Inc. II President, AdvisorOnTrack Inc.

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Coming Soon: a fully functional website with resources and support for victims

This is Exhibit D of the affidavit of
Gonen Gmir signed before me, on 21 day of
August, 2020

Grant A. L. Stokes

Ministry of the Attorney General

Ministère du Procureur Général

Office of the Public Guardian and Trustee
Toronto Regional Office

Bureau du Tuteur et curateur public
Bureau régional de Toronto



595 Bay Street, Suite 800
Toronto, ON M5G 2M6
Tel: (416) 314-2800
Fax: (416) 314-2695
Toll Free: (800) 366-0335

595, rue Bay, Bureau 800
Toronto, ON M5G 2M6
Tél. : (416) 314-2800
Télec. : (416) 314-2695
Sans Frais: (800) 366-0335

July 2, 2020

Our Correspondence Reference #: M-2020-6993

Via Email: dw.cceh@outlook.com

Dear Ms. Moore,

I am writing to respond to your e-mails of June 18 and 19, 2020, which you sent to the Ministry of the Attorney General webmaster.

Based on your e-mails, it appears that in your opinion, various lawyers and Judges involved in your litigation are mentally incompetent and you would like "to have them replaced by the Public Guardian and Trustee" ("PGT").

The PGT has been advised that you are currently represented in your litigation by a lawyer (Mr. Snir). You may wish to discuss with your counsel the evidentiary requirements and the process for having someone declared mentally incapable, as well as the result this could have in ongoing litigation. I understand that you filed a complaint against Mr. Snir with the Law Society of Ontario. If you retain another lawyer, that person can advise on all aspects of your litigation. As you are not a client of the PGT, this office cannot give you legal advice or assistance.

I am providing a copy of this letter to your counsel Mr. Snir.

Yours truly,


Walter Kim
Team Leader Litigation

cc: Gonen Snir

This is Exhibit E of the affidavit of
Gonen Snir signed before me, on 21 day of
August, 2020

Shant Arlatte



Gonen Snir <gonen@snirlaw.com>

Notice of Motion || FW: Another Illegal Endorsement from Ottawa's SCJ || RE: Kiska v. Moore - FC-15-2446

Deirdre Moore <dw.cceh@outlook.com>

Tue, Aug 11, 2020 at 12:30 PM

To: "Law, James (MAG)" <James.Law@ontario.ca>, "info@snirlaw.com" <info@snirlaw.com>, Wade Smith <WSmith@bellbaker.com>, "Souder, Deborah" <Deborah.Souder@casott.on.ca>, "debora@scholey.ca" <debora@scholey.ca>

Cc: "Savage, Malcolm (MAG)" <Malcolm.Savage@ontario.ca>, "Walter.Kim@ontario.ca" <Walter.Kim@ontario.ca>

Good afternoon James,

Acting as Gonen Snir's agent as he has proved himself, among other things, incapable, attached you will find my Notice of Motion regarding his removal from record (served on other parties by this e-mail). As he is already seeking this, this motion should be *deemed* unopposed* and, therefore, may be heard in writing.

Please confirm the length of the Affidavit that may be submitted **as well as** length of the corresponding exhibits; though, having judges *limit* Affidavits (which is evidence) and then claiming there was no/not enough evidence to support a certain allegation is a tad ridiculous, is it not? My attempt to provide sufficient evidence to the court by linking my previous Affidavit to pdf'd documents on my website only to have **ALL** of it ignored and my motion denied is also suspect, in my opinion. Regardless, I await your response and the date upon which you would like me to serve my Affidavit.

Thank you

*When I asked the parties if they would consent to my Motion to have Snir removed from record, both the CAS and Kiska's lawyer refused: they are truly a lawless bunch.

PS. Please note that as Judge Pamela MacEachern is now in a position to testify regarding (at a minimum) the crimes that Gonen Snir, affiliate of The Children's Aid Society of Ottawa/Jonathan Kiska/Wade Smith/Debora Scholey, has committed against me, I intend to sequester her to my criminal trial.

PPS. I will be submitting a new Notice of Motion regarding a change to a Temporary Order (Urgent Interim Financial Support) and will ensure that I *include* the evidence instead of *linking* the evidence so please confirm the page limitations with respect to exhibits as soon as possible.

From: Deirdre Moore <dw.cceh@outlook.com>

Sent: Monday, August 10, 2020 5:01 PM

To: Law, James (MAG) <James.Law@ontario.ca>; Gonen Snir <gonen@snirlaw.com>; Wade Smith <WSmith@bellbaker.com>

Cc: Walter.Kim@ontario.ca; Ministry of Children, Community and Social Services <MinisterMCCSS@ontario.ca>; Ministry of the Attorney General <attorneygeneral@ontario.ca>; Dan Jones <Dan.Jones@edmontonpolice.ca>; daoustf@ottawapolice.ca; Bender, Alex <BenderA@ottawapolice.ca>; Savage, Malcolm (MAG) <Malcolm.Savage@ontario.ca>; moiz.karimjee@ontario.ca; vivianlee.stewart@ontario.ca; Holowka, Brian (MAG) <Brian.Holowka@ontario.ca>

Subject: Another Illegal Endorsement from Ottawa's SCJ || RE: Kiska v. Moore - FC-15-2446



Gonen Snir <gonen@snirlaw.com>

Another Illegal Endorsement from Ottawa's SCJ || RE: Kiska v. Moore - FC-15-2446

1 message

Mon, Aug 10, 2020 at 5:01 PM

Deirdre Moore <dw.cceh@outlook.com>

To: "Law, James (MAG)" <James.Law@ontario.ca>, Gonen Snir <gonen@snirlaw.com>, Wade Smith <WSmith@bellbaker.com>

Cc: "Walter.Kim@ontario.ca" <Walter.Kim@ontario.ca>, "Ministry of Children, Community and Social Services" <MinisterMCCSS@ontario.ca>, Ministry of the Attorney General <attorneygeneral@ontario.ca>, Dan Jones <Dan.Jones@edmontonpolice.ca>, "daoustf@ottawapolice.ca" <daoustf@ottawapolice.ca>, "Bender, Alex" <BenderA@ottawapolice.ca>, "Savage, Malcolm (MAG)" <Malcolm.Savage@ontario.ca>, "moiz.karimjee@ontario.ca" <moiz.karimjee@ontario.ca>, "vivianlee.stewart@ontario.ca" <vivianlee.stewart@ontario.ca>, "Holowka, Brian (MAG)" <Brian.Holowka@ontario.ca>

Does she not realize that her endorsement (viewable here: http://pfi.rocks/wp-content/uploads/2020/08/000092KJ_20200807_Illegal-Endorsement_Judge-Pamela_MacEachern_FC-15-2446_FC-19-CP-08_Motions_SAQOTU.pdf) is *illegal* as already explained in my previous correspondence to you, viewable here: http://pfi.rocks/wp-content/uploads/2020/05/000019KJ_20200529_2000xx_EmailTo_James-Law_re-Motions-Gonen-SnirTracy-EngelkingMark-ShelstonCIVIL_SAQOTU_Andeé-Sea-Cae-Jak-002.pdf? Please forward this information to her so that she can become familiar with the applicable laws.

Meanwhile, I continue to make arrangements (as his agent) to have Gonen Snir removed from record *properly* (as a Civil matter); nullifying his exploitative retainer agreement in the process. Furthermore, as she *claims* to require further evidence of the urgency regarding my receipt of unpaid spousal support; I shall simply draft yet another Notice of Motion and include *even more* evidence.

Thank you for your assistance in this matter.

Walter Kim: Do you know of *any* Ontario SCJ judges whom are *not* sociopathic? Clearly, Ottawa's court house is infested.

From: Law, James (MAG) <James.Law@ontario.ca>

Sent: Monday, August 10, 2020 2:21 PM

To: Deirdre Moore (dw.cceh@outlook.com) <dw.cceh@outlook.com>; Gonen Snir <gonen@snirlaw.com>; Wade Smith <WSmith@bellbaker.com>

Subject: re: Kiska v. Moore - FC-15-2446

Importance: High

Good afternoon,

Please see the attached endorsement from Justice MacEachern.

Thank you,

James Law

SCJ Assistant Trial Coordinator

161 Elgin Street Ottawa, Ontario

5th Floor – Room 5300

This electronic message (email) may contain **PRIVILEGED AND CONFIDENTIAL INFORMATION** only for use of the Addressee(s) named above. If you are not the intended recipient of this email or the employee or agent responsible for delivering it to the intended recipient(s), you are hereby notified that any dissemination or copying of this email and/or any attachment files is strictly prohibited. If you have received this email in error, please immediately notify the sender and arrange for the return of any and all copies and the permanent deletion of this email and any attachments.

This is Exhibit F of the affidavit of
Gonen Gmir signed before me, on 21 day of
August, 2020

Grant A. Little

lessons from divorcing a
narcissist

(15:20) DEAR JACK WHITE 002

Following over four years of enduring Ottawa's systemic prevention of my divorce from sociopath Jonathan Kiska, I have an abundance of evidence which supports the arrest, charge, and detention (or, at least the investigation) of:

1. Judicial Officials

- Catherine Altman
- Julie Audet
- x Beaudoin
- Tracy Engelking
- x Laliberté Jr.
- x MacLeod
- J.A. Parfett
- Kevin B. Phillips
- Mark Sheiston
-
-

2. Office of the Public Guardian and Trustee

- Blank

3. Office of the Children's Lawyer

- Shuah Roskies
- Debora Scholey

4. Children's Aid Society of Ottawa

- Jenn Campbell
- Isabelle Guindon
- Jessica Henry
- Viana Ibrahim
- Tara MacDougall
- Kristin Moir
- Yvonne Munro
- Mohammed Said
- Deborah Souder
- Bonnie Stafford
- Kelly White
- Stephen/Steven X

5. Physicians & Counsellors

- Keith Anderson, psychiatrist
- Yolande Charbonneau, psychiatrist
- Judy Crow, family physician
- Nadine Crowley, family physician
- Paule Kemgni, psychiatrist
- Adrienne Matheson, child psychologist
- Deanna Mercer, psychiatrist
- Katelyn Perkins, family physician
- Daniel Saul, psychiatrist

6. School Administrators

- Wanda Mills-Boone
- Greg Wyzynski

7. Crown Prosecutors

- Michael Boyce
- Brian Halowka
- Moiz Karimjee
- John Ramsay
- Malcolm Savage
- Vivian-Lee Stewart

8. Ottawa Police Service

- Lisa Beaucage

- Alex Bender
- Jean Benoit
- Lana Cameron
- François D'Aoust
- Alex Kirady
- Sébastien Paradis
- x Ressor
- add other members of Ottawa Police Services

9. Ottawa Victim Services

- 1. Melissa Heimerl

10. RCMP Officers, Quebec, Ontario, Province 4, Province 1

- ==

11. Individuals whom have been called to the Bar and continue to practice law, and their assistants

- Family Law
 - Michèle Blais and her assistant/accomplice Genevieve Lalonde
 - Wade Smith and his assistant/accomplice Christine Hammond
 - Gonen Snir and his assistant/accomplice ==
- Criminal Law
 - Joseph Addelman and his colleague ...
 - John Hale
- Civil Law
 - Earl Atnikov of Langevin Morris Smith LLP
 - Marta Smierczuk of Nelligan O'Brien Payne
 - Susanne Sviargula of Cavanagh LLP
 - ==

12. Others

- More lawyers: Tania Pompilio (Genevieve Lalonde), Susanne Sviargula (x), Gonen Snir (Julie Ada)

13. Bankers – Bankers Hadja Cherif and Patrick Leonard (Alterna), Matthew Razan and x y (BMO), x y, z (RBC), a (Scotiabank)

14. "Family" and "Friends"

15. To be added

- Lameh El Rayes, Diego Stalls Fernandez and Kaldoon Habib (real estate-related scam)
- Previous family law lawyer, Victor Vallance Blais
- Melissa Heimerl, Alexa Bol, Melissa X, Lorie Fuentes,
- Sarah Merratt, Shavyn O'Reilly, ...
- MHCC, JHS
- law firms: Blakes, Gowling, Borden Ladner Gervais, Langevin Morris Smith,

*This is Exhibit G of the affidavit of
Gonen Snir signed before me, on 21 day of
August, 2020*

Grant Schlotke



SCANNED

Gonen Snir <gonen@snirlaw.com>

14 Tasks || RE: Interest || FW: Clarification || RE: Apologies || FW: Landlord Information || RE: Re-phrase || RE: Your client || FW: Is Malcom Savage being paid by my Ex-husband ...

1 message

Deirdre Moore <dw.cceh@outlook.com>

Mon, May 4, 2020 at 4:29 PM

To: Gonen Snir <gonen@snirlaw.com>

Cc: Wade Smith <WSmith@bellbaker.com>, "CHammond@bellbaker.com" <CHammond@bellbaker.com>, "info@bellbaker.com" <info@bellbaker.com>, "jenn.campbell@casott.on.ca" <jenn.campbell@casott.on.ca>, "Said, Mohammed" <mohammed.said@casott.on.ca>, "Brien, Sarah" <Sarah.Brien@casott.on.ca>, "isabelle.guindon@casott.on.ca" <isabelle.guindon@casott.on.ca>, "White, Kelly" <Kelly.White@casott.on.ca>, "tara.macdougall@casott.on.ca" <tara.macdougall@casott.on.ca>, "bonnie.stafford@casott.on.ca" <bonnie.stafford@casott.on.ca>, "kristin.moir@casott.on.ca" <kristin.moir@casott.on.ca>, "debora@scholey.ca" <debora@scholey.ca>, "patric.senson2@ontario.ca" <patric.senson2@ontario.ca>, "Roskies, Shuah (MAG)" <Shuah.Roskies@ontario.ca>, "Clarke, Pauline (MAG)" <Pauline.Clarke@ontario.ca>, "katherine.kavassalis@ontario.ca" <katherine.kavassalis@ontario.ca>, "Savage, Malcolm (MAG)" <Malcolm.Savage@ontario.ca>, "Gervais, Daniel" <GervaisD@ottawapolice.ca>, "daoustf@ottawapolice.ca" <daoustf@ottawapolice.ca>, "brian.holowka@ontario.ca" <brian.holowka@ontario.ca>, "dmoore@pfi.rock" <dmoore@pfi.rock>

Mr. Snir,

Your e-mail is laden with errors, omissions and malicious obfuscation.

I am not releasing you: I expect you to do your job. To date, you have not managed to accomplish anything other than increase the degree of irreparable harm to my children and me. I have, again, listed your tasks for you: note that the amount at item #9 is now \$3,690.

Current Tasks:

1. Provide for me a detailed invoice of your services rendered (listed chronologically with reference to specific accomplishments) since November 18, 2019: the day that I completed all of the paperwork that you required in order to be retained by me
2. Book a date for a Motion* to change a temporary order re: interim support in FC-15-2446
3. Book a date for a Motion* to have CAS Application struck in FC-19-CP08
4. Bring a procedural motion to seek leave to bring ALL of my legal matters in front of a Superior Court Judge in Family Court via Courts of Justice Action section 21.9. (This includes, but is not limited to, my provincial criminal matter, my federal criminal matter, my \$3M+ lawsuit against Victor Vallance Blais LLP and the two family law matters)
5. Direct me to the legislation which details the age at which a "child" may choose where he/she resides
6. Confirm whether or not your colleague, Joseph Addelman, has been formally removed from record on both of my criminal files
7. Draft an offer to settle for CAS: sole custody/access of Sean and Cate to me with access to Kiska at my sole discretion and I may not pursue a class action against them
8. Draft an offer to settle for Kiska: net proceeds from sale of Lampman, net proceeds from sale of AOT, half of his revenue generated retroactive to September 26, 2015 and going forward for perpetuity for me; include other important items from Amended Answer; offer something in return
9. Arrange to have sent to me by e-transfer \$3,690 as I have not received a support payment from Jonathan Kiska since February 2020.

Additional Tasks (added March 18, 2020)

10. Ascertain who has the contents of my 3-bedroom home and how I re-acquire its contents. Perhaps you may need to hire a private investigator?
11. Draft a \$10M statement of claim against the Children's Aid Society of Ottawa
12. Draft a \$10M statement of claim against Bell Baker
13. Draft a \$10M statement of claim against Crown Attorney's Office
14. Getting the divorce granted.

Deirdre

Deirdre Moore, CFA, BBA

President, SAQOTU Inc.

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From: Gonen Snir <gonen@snirlaw.com>

Sent: Monday, May 4, 2020 12:48 PM

To: Deirdre Moore <dw.cceh@outlook.com>

Subject: Re: Interest || FW: Clarification || RE: Apologies || FW: Landlord Information || RE: Re-phrase || RE: Your client || FW: Is Malcom Savage being paid by my Ex-husband to abuse my children and me? Or, is this the role of the Crown Attorney's Office in O...

Dear Ms. Moore

Im not sure that after the lack of trust that we have in our relationship it would be the best for your matter that I will continue to represent you.

I requested you to release me from your files to avoid cost and time that I will need to apply to the court to do so, but you refused.

I urged you to reconsider that, and agree to sign Notice of change representation.

If you do so, I will only claim the fees for the work that was done until now.

And in regards to the court proceedings, the court is close and it seems it will be at least until July 2020.

It hears only COVID 19 related and urgent matters.

In both the family and the CAS files we can not move with your custody and access as you are restrained from seeing your children by a criminal court As explained to you in the past you first have to take care of these restrictions.

Kind regards

Gonen Snir

On Sun, May 3, 2020 at 4:29 AM Deirdre Moore <dw.cceh@outlook.com> wrote:

Are you going to work for me and my children, or not? If so, I expect that something be accomplished by end of business next Friday. (I will never trigger your "\$60,000 paid regardless" clause, which you slid in after our initial agreement.)

From: Deirdre Moore <dw.cceh@outlook.com>

Sent: Sunday, May 3, 2020 3:33 AM

To: John Hale <john@halelaw.ca>; Savage, Malcolm (MAG) <Malcolm.Savage@ontario.ca>; brian.holowka@ontario.ca

Cc: abrass@alanbrass.ca; adamnewman9@gmail.com; aking@aaronkinglaw.com; alafreniere@cheniernotturmo.com; alliethompson00@gmail.com; amelia@lambandobrien.com; amy@aesheppardlaw.ca; annabrylewski@rogers.com; annemarie@mcelroylaw.ca; ariyasheivari@gmail.com; ashish@duvadie.ca; barnesgary@rogers.com; bcrawford@foordlaw.ca; biagiodelgreco@hotmail.com; bruce@bruceengel.com; brundia3390@rogers.com; castlet@sympatico.ca; celine@celinedostaler.ca; clebourneau@viceandhunter.ca; criminallawyer@gmail.com; cwlaw2@bellnet.ca; daniel@nugentlaw.ca; david@dklawottawa.ca; day@shoredavis.com; dcadieaux@mazerollelemay.com; deanna@paoluccilaw.ca; dhoward@lmslawyers.com; dianecondo@bell.net; dimitri@trofimoff.info; dman27366@gmail.com; dmwerminski@gmail.com; dominic@dominiclamb.com; doug@abgottawa.com; elena@bruceengel.com; eric@gghlawyers.ca; erica.tanny@mail.mcgill.ca; ewan@elginstreetlaw.com; ewarren@carrollwallace.com; gbebbington1@gmail.com; gmottawa@gmail.com; heathersalterccd@gmail.com; henryaburr@gmail.com; howard@agpllp.ca; icarter@bsbcriminallaw.com; info@emerylawottawa.com; info@hotel-hot.ru; jaboueid@lmslawyers.com; james@stevensoncrimlaw.com; jamesdsbowie@gmail.com; jamesmckaystevenson@gmail.com; jasna@mialaw.ca; jason@abgottawa.com; jd@harbic.com; jdody@bsbcriminallaw.com; jeannicher@gmail.com; jenny.mcknight@hotmail.com; jfoord@foordlaw.ca; jlegault@bsbcriminallaw.com; jnadle00@gmail.com; joannmelochelaw@gmail.com; jodie@deeperiverlawyer.com; john@halelaw.ca; joshua.clarke@armouredsuits.ca; Jwandallo@gmail.com; kareidlb@gmail.com; karen@kgklegal.com; kate@mialaw.ca; keara@mialaw.ca; ken.dunham@centrepoinlaw.com;

This is Exhibit C of the affidavit of
Gonen Gmir signed before me, on 21 day of
August, 2020

Grant A. Little

FORM 37A
Courts of Justice Act
NOTICE OF MOTION

Deirdre Moore, acting as agent for Gonen Snir, will make a motion to the court on August 20, 2020 at 10:00 a.m. or as soon as possible shortly thereafter.

PROPOSED METHOD OF HEARING: The motion is to be heard:

- ☐ in writing under subrule 37.12.1 (1) because it is unopposed
- ☒ in writing as an opposed motion under subrule 37.12.1(4)
- ☐ orally

THE MOTION IS FOR:

1. An order that file #FC-15-2446 be transferred to the Kingston Courthouse pursuant to Rule 5(8) of the *Family Law Rules* due to the current state of lawlessness at Ottawa's Superior Court of Justice.
2. An order for the removal of Gonen Snir ("Snir") as lawyer of record from FC-15-2446 pursuant to Rule 37.12.1 of the Rules of Civil Procedure as he has committed multiple crimes against his client and assisted her former spouse and the Children's Aid Society of Ottawa in their ongoing emotional and financial abuse of her.
3. An order for costs on a full recovery basis under Rules 24 (8) of the Family Law Rules as Snir has demonstrated deplorable behaviour including, but not limited to, defamation, creating false documents and fraud.
4. An order that Snir shall not charge the client fees or disbursements for *any* work that he *claims* to have done as nothing was done in the client's best interests (Rule 24(9) of the Family Law Rules).
5. An order that Snir's retainer agreement be deemed void.
6. An order for \$2,000 in compensatory damages; the amount that Snir accepted as a retainer fee in November 2019 and applied against her account months later—despite accomplishing nothing except losing a records motion against the Children's Aid Society of Ottawa.
7. An order for \$1,500 in compensatory damages; the amount that the client paid in order have the lien placed on the matrimonial home so that she could retain his firm.
8. An order for compensatory damages (\$1,500: amount to be confirmed); the amount that the client will be required to pay in order to have the lien *removed* from the matrimonial home.
9. An order for aggravated damages due to Snir's:
 - a. breach of contract: \$50,000
 - b. breach of fiduciary responsibility: \$50,000
 - c. negligence: \$50,000
 - d. defamation: \$50,000
 - e. intentional infliction of emotional suffering: \$50,000
 - f. negligent infliction of emotional suffering: \$50,000

10. An order for pecuniary damages due to Snir's:
- breach of contract: \$50,000
 - breach of fiduciary responsibility: \$50,000
 - negligence: \$50,000
 - defamation: \$50,000
 - intentional infliction of emotional suffering: \$50,000
 - negligent infliction of emotional suffering: \$50,000

GROUND FOR THIS MOTION include illegal activity by multiple Ottawa-based, Superior Court of Justice judges, the Children's Aid Society of Ottawa, former spouse's family lawyer and Snir; each of whom have committed multiple counts of multiple violations of both civil law and the *Criminal Code of Canada* including, but not limited to perjury, defamatory libel, fabricating evidence and fraud.

THE FOLLOWING DOCUMENTARY EVIDENCE will be used at the hearing of the motion:

- Audio recording of 20200814 discussion with Trial Co-ordinators Office
 - Snir's scandalous 20200522 Motion materials filed in the Continuing Record (illegal in itself).
 - Justice Pamela MacEachern's scandalous 20200809 endorsement to illegally schedule a motion for FC-15-2446.
 - An Affidavit which will included files from evidence currently stored on advocacy website: www.pfi.rocks).
 - Excerpts from the 11-volume FC-15-2446 Continuing Record which support the requests for all orders: evidence of years of psychological, emotional and financial abuse by Deirdre Moore's former spouse (Jonathan Kiska ("Kiska")), his lawyer (Wade Smith) and multiple criminals operating under the Children's Aid Society of Ottawa and Ottawa's Superior Court of Justice.
 - Further evidence against Kiska which is contained in Ottawa Police Services reports.
-

August 14, 2020 Deirdre Moore, 215 Montreal Road, Ottawa, Ontario K1L 6C8 || dmoore@pfi.rocks

To: Other Parties

Gonen Snir, Snir Law, 85 Albert Street, Ottawa, Ontario K1P 6A4
(613) 237-2673 (ph) (613) 237-8146 (fx) info@snirlaw.com

Wade Smith, Bell Baker LLP, 700-116 Lisgar Street, Ottawa, Ontario K2P 0C2
(613) 237-3444 (ph) (613) 237-1413 wsmith@bellbaker.com

Deborah Souder, Children's Aid Society of Ottawa, 1602 Telesat Court, Ottawa, Ontario K1B 1B1
(613) 747-7800 ext. 3245 (ph) (613) 747-1933 (fx) deborah.souder@casott.on.ca

Debora Scholey, Office of The Children's Lawyer (local) 29-4338 Innes Road, Ottawa, ON K4A 3W3
(613) 424-0629 (ph) (613) 482-4733 (fx) debora@scholey.ca



Gonen Snir <gonen@snirlaw.com>

On Hold || FW: Notice of Motion - Transfer of File from Ottawa's Superior Court of Justice (Family Branch)

1 message

Deirdre Moore <dw.cceh@outlook.com>

Sun, Aug 16, 2020 at 1:29 PM

To: "kingston.scj.courts@ontario.ca" <kingston.scj.courts@ontario.ca>

Cc: Wade Smith <WSmith@bellbaker.com>, "info@snirlaw.com" <info@snirlaw.com>

Good afternoon,

Please disregard my previously submitted Motion materials for the time-being. I realized that I should first assess whether or not the Children's Aid Society of Kingston ("CAS Kingston") is a legitimate operation (unlike the one in Ottawa which fuels a human-trafficking pipeline) before transferring my legal matters to the Kingston courthouse. Plus, I have received some positive feedback from another part of Ontario and, perhaps, it may be safer for my children and me to re-locate somewhere farther from Ottawa.

I did cc your office on my correspondence to CAS Kingston. I apologize for that step in the process being an afterthought and any inconvenience that may have occurred as a result.

Sincerely,

And   

And    Sea Cae Jak, BBA (formerly Deirdre Ann Moore)

President, SAQOTU Inc. II President, AdvisorOnTrack Inc.

*Making Change Happen! at pfi.rocks!***Coming Soon: a fully functional website with resources and support for victims****From:** Deirdre Moore**Sent:** Friday, August 14, 2020 4:01 PM**To:** "kingston.scj.courts@ontario.ca" <kingston.scj.courts@ontario.ca>**Cc:** Wade Smith <WSmith@bellbaker.com>; "info@snirlaw.com" <info@snirlaw.com>**Subject:** Notice of Motion - Transfer of File from Ottawa's Superior Court of Justice (Family Branch)**Importance:** High

Good afternoon,

8/18/2020

Snir Law Mail - On Hold || FW: Notice of Motion - Transfer of File from Ottawa's Superior Court of Justice (Family Branch)

Acting for Gonen Smith, Ottawa-based con-artist practicing family law but serving the best interests of the Children's Aid Society of Ottawa and his client's former spouse, please find attached Motion materials to have the file FC-15-2446 transferred to the Kingston Courthouse. Nearly five years since divorce proceedings began, the Ottawa-based "group" has proven itself incapable (among other things). A second Notice of Motion to transfer the scandalous 2019 CAS Application will follow, as will the supporting Affidavits.

Thank you

Andee

Andee Sea Cae Jak, BBA (formerly Deirdre Ann Moore)

President, SAQOTU Inc. II President, AdvisorOnTrack Inc.

Making Change Happen! at pfi.rocks!


Coming Soon: a fully functional website with resources and support for victims

4 attachments

 000096KJ_20200814_EmailTo_Kingston-Courthouse_Notice-of-Motion_Transfer-of-File_FC-15-2446_SAQOTU.pdf
735K

 000015KJ_20200522_Form 14B_Notice of Motion_Gonen-Snir_FC-15-2446_Remove-lawyer-from-Record_SAQOTU_Andee-Sea-Cae-Jak.pdf
488K

 000015KJ_20200522_Form 14A_Affidavit_Gonen-Snir_FC-15-2446_Remove-lawyer-from-Record_SAQOTU_Andee-Sea-Cae-Jak.pdf
11443K

 000092KJ_20200807_Illegal-Endorsement_Judge-Pamela_MacEachern_FC-15-2446_FC-19-CP-08_Motions_SAQOTU.pdf
271K

*This is Exhibit 7 of the affidavit of
Gonen Snir signed before me, on 21 day of
August, 2020*

Shant Ad-Atto

Superior Court of Justice of Ontario

(Name of court)

Court File Number

FC-19-CP000008

at 161 Elgin Street, Ottawa, Ontario, K2P 2K1

Court office address

Assignment Court Brief
for assignment court on
August 28, 2020

Applicant(s)

Full legal name & address for service- street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

The Children's Aid Society of Ottawa
1602 Telesat Court
Ottawa, Ontario
K1B 1B1
Canada
Phone: (613) 747-7800
Fax: (613) 747-1933

Lawyer's name & address - street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Tara MacDougall
1602 Telesat Court
Ottawa, Ontario
K1B 1B1
Canada
Phone: (613) 747-7800 ext. 3245
Fax: (613) 747-1933
eMail : Tara.MacDougall@casott.on.ca

Respondent(s)

Full legal name & address for service- street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Deirdre Moore
Address Confidential

Lawyer's name & address - street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any).

Jonathan Kiska
1244 Lampman Crescent
Ottawa, Ontario
K2C 1P8
Tel: 613-794-5292

Wade Smith
700-116 Lisgar Street
Ottawa, Ontario
K2P 0C2
Tel: 613-237-3444
Fax: 613-237-1413
eMail: wsmith@bellbaker.com

Name & address for service for Children's Lawyer agent - street & number, municipality, postal code, telephone & fax numbers and e-mail address (if any) and name of person represented.

Sean Kiska's Lawyer:
Debora Scholey
29-4338 Innes Road
Ottawa, Ontario
K4A 3W3
Tel: 613-424-0629
Fax: 613-482-4733
eMail: debora@scholey.ca

Cate Kiska's Lawyer:
Debora Scholey
29-4338 Innes Road
Ottawa, Ontario
K4A 3W3
Tel: 613-424-0629

Fax: 613-482-4733
eMail: debora@scholey.ca

1. My name is *(full legal name)* Tara MacDougall
and I am ☒ a lawyer for *(name)* The Children's Aid Society of Ottawa
☐ *(Other. Specify)*
2. The Scheduled date and time for this **Assignment Court** is (date) August 28, 2020 at 9:30am
3. Is a bilingual Judge required for Trial: ☐ Yes ☒ No
4. Application is
☐ Protection Application for :
☒ Status Review Application for : s. 102(1) custody to the father with access to the mother at the discretion of the father
☐ Amended : Number of Times:
☐ Original Application was issued on :

5. Names of Children:

Child's Full Legal Name	Date of Birth	Age
Sean Kiska	08, May, 2006	13
Cate Kiska	11, November, 2007	12

6. What are the issues in this case that **HAVE** been settled or about which an order has been made:

- ☒ Access ☒ Finding in need of protection
- Child* ☒ placing the child(ren) with (name of person) Jonathan Kiska for four (4) months under supervision.
- Protection*
- Cases* ☐ Society wardship for months. ☐ Crown Wardship
☐ Interim Society Care ☐ Extended Society Care
☒ other(Specify)

- On April 8, 2019, the Honourable Justice MacLeod made statutory findings on the children, who are not First Nation, Inuk or Métis; found them in need of protection; and granted an order placing them with their father subject to the supervision of the Society for a period of four (4) months on terms and conditions, with access to the mother at the discretion of the Society and in accordance with the children's wishes.
- There is also a s. 137 restraining order against the mother as follows:
 - Deirdre Moore, shall not attend within 500m of the residence of the father, John Kiska.
 - Deirdre Moore, shall not attend within 500m of the children's schools, unless prior approval is obtained in writing by the Society.
 - Deirdre Moore, shall not communicate with the children Sean and Cate Kiska, by any means (electronic, telephone, etc) without the

supervision of the father, John Kiska.

4) Deirdre Moore, shall not have any physical contact or access with the children Sean and Cate Kiska, except fully supervised access at the discretion of the Children's Aid Society of Ottawa.

3. This restraining order shall be enforced by the Ottawa Police Service (OPS), the Ontario Provincial Police (OPP), the Royal Canadian Mounted Police (RCMP), or any other police service within its jurisdiction.
4. This order shall remain in force unless it is varied, extended or terminated by the court.

7. What are the issues in this case that have **NOT** yet been settled:

- ☐ Access ☐ Finding in need of protection
☐ placing the child(ren) with (name of person) for months under supervision.
- ☐ Society wardship for months. ☐ Crown Wardship
☐ Interim Society Care ☐ Extended Society Care
☒ other(Specify) s. 102(1) custody order to the father with access to the mother at the discretion of the father

8. Reason(s) why case has not yet been scheduled for trial: The mother was initially incarcerated when the Society brought the SRA. Then the Society had to consider bringing a motion to have the Public Guardian and Trustee appointed to represent Ms. Moore, which required a significant third-party records motion to obtain relevant medical documents. Ms. Moore then was released and retained counsel. Settlement has not been possible, and Ms. Moore's counsel wishes to be removed from record, and the Society may once again need to bring a motion to have the Public Guardian and Trustee appointed ahead of trial.

9. Where is the child living at the time of this conference?

The children are currently living with their father under a final supervision order.

10. If the child is in the care of the Society, what is the length of time the child has been in care?

N/A

11. Are any of the issues in this case urgent? ☐ Yes ☒ No

12. Has there been an assessment completed in this case: ☐ Yes ☒ No ☐ Pending Estimated Completion Date:

13. Has there been a Settlement Conference in this case?
☒ Yes Date: 20/11/2019 ☐ No

14. Has there been a Trial Management Conference in this case?

☐ Yes Date: ☒ No

15. Are there any orders or directions for trial that have not been carried out? ☐ Yes ☐ No ☒ N/A

16. A brief outline of the position of Applicant/Respondent is:

The Applicant Society takes the position that Ms. Moore's unstable mental health condition poses a risk of emotional or physical harm to the children. Although she has at times, appeared to show insight and to manage her conditions well, in the past two years she has had a number of periods where she is irrational, unable to remain child-focused, and unable to meaningfully treat her condition or present a plan to mitigate the effects of her mental health on the children. Further, her condition leads her to feel and act with paranoia and mistrust of many professionals such as the Society, police, medical and judicial professionals, such that it has been impossible to observe any progress.

The children have not seen Ms. Moore since February 2019, and the father has demonstrated an ability to meet their needs and act protectively. There is no concern that he would inappropriately withhold access to the mother.

The Respondent father is in support of the Society's position and also seeks a restraining order.

The Respondent mother disputes the Society's position. She alleges that the father was abusive to her, has been 'gaslighting' her for years, and that there are many professionals who are purposefully victimizing her and her children and not acting appropriately.

17. These are the witnesses whom I plan to have testify for me, the topics about which they will testify and my current estimate of time for the testimony of each witness, including cross-examination:

Name of witness ↓	Topic about which witness will testify	Current time estimate for witness
Mohammed Said, CPW	Ongoing work with family since 2019	one day total
Jennifer Campbell, CYC	Attempts to organize access in summer 2019	two hours total
Dr. Deanna Mercer, psychiatrist	Treatment of mother, diagnosis, prognosis, 2015-2019	half a day total
Dr. Judy Chow, family physician	Treatment of mother, personal experiences with mother's behaviours and concerns for parenting	half a day total
Vianna Ibrahim, CPW	Investigation regarding family 2018-2019	via affidavit in chief; one hour in cross

The Society will also be seeking to introduce a number of documents under the s. 94 CYFSA "past parenting" evidence/ business records exception under the *Ontario Evidence Act* , namely:

1. Ottawa Police business records of involvement with the family;

2. Two decision of the Consent and Capacity Board regarding Ms. Moore, from May 2013 and July 2014;
3. Hospital business records (Montfort Hospital, Queensway Carleton Hospital, the Ottawa Hospital; Royal Ottawa Mental Health Centre)
4. Copy of previous court decisions- *Moore v Victor Vallance Blais LLP* , 2019 ONSC 4074; 2019 ONSC 4118;
5. Copy of transcripts of criminal proceedings; *R v Deirdre Moore* , January 9, 2020 proceedings before Justice CD Aitken; *R v Deirdre Moore* , January 31, 2020 proceedings before JP Lauzon; *R v Deirdre Moore*, February 26, 2020 proceedings before Justice Alder;
6. Copy of s. 657.3 report of Dr. Paule Kemgni, made under the *Criminal Code* (dated April 15, 2019) (translation included)
7. Endorsement of Justice MacEachern regarding Society's third-party records motion (dated December 27, 2019)

The Society has included an extra half-day of trial time in its estimate to allow for a possible contested *voir dire* on business records.

18. Are there any issues with scheduling of expert witnesses?

Unknown at this time. The Society would be calling Dr. Mercer and Dr. Chow as participant experts only.

19. Are the services of an interpreter required for any of the witnesses?

Not at this time.

20. I estimate that the trial time needed for my part of this trial is three days; the other side's part of this trial is days.

June 14, 2020

Date of signature

Tara MacDougall

Lawyer's or party's signature

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