

## **Schedule A**

**Part of the July 11, 2018 Report**

**from the**

### **Office of the Children's Lawyer**

Following a four-month investigation, the clinician documented that the mother, Deirdre Moore, was the superior parent and recommended that she be given sole custody. It also documented how the father, Jonathan Kiska refused to assist with the tutoring of their daughter, Cate, even though she was three years behind in school (likely due to the brutal divorce) and that she cringed when he attempted to give her a hug.

OCL FILE NO: # 02350.2017

Court File No: # FC-15-2446-0000

This is EXHIBIT "A" referred to in the Affidavit  
of Katherine Bobula, sworn before me on the 11<sup>th</sup>  
day of July, 2018.  
A Commissioner etc.,  
for the Government of Ontario  
Une Commissaire etc.,  
au service du gouvernement de l'Ontario,  
Ministry of Attorney General  
Ministère de la Procureure Générale

*[Signature]*  
A Commissioner, etc.

**SUPERIOR COURT OF JUSTICE, FAMILY COURT**

BETWEEN:

JONATHAN WILLIAM KISKA

APPLICANT

AND

DEIRDRE ANN MOORE

RESPONDENT

**REPORT OF THE CHILDREN'S LAWYER**

**CHILDREN:**

Sean Kiska, born May 8, 2006 (12 years of age)

Cate Kiska, born November 30, 2007 (10 years of age)

On January 26, 2018, the Honourable Justice Englekin requested the involvement of the Office of the Children's Lawyer. This Office consented to provide services pursuant to section 112 of the *Courts of Justice Act* on March 12, 2018. On March 12, 2018, this matter was assigned to this clinical investigator.

This file was delayed as the Children's Aid Society of Ottawa required more time to provide disclosure.

A Disclosure Meeting was held on June 28, 2018.

Please note that the Sources of Information (Appendix A) & Collateral Information (Appendix B) are located at the end of the report.

## LIST OF PARTICIPANTS

### Children

Sean Kiska- 12 years of age -- male- Biological son to the Parties

Cate Kiska- 10 years of age -- female- Biological daughter to the Parties

### Parent/Party

Jonathan Kiska- 57 years of age- Applicant /Biological father to the children- Self-employed/Consultant- Ottawa

Deirdre Moore- 52 years of age- Respondent /Biological mother to the children- Unemployed- Ottawa

## SUMMARY OF SITUATION

Sean and Cate Kiska were born of the former union between Jonathan Kiska and Deirdre Moore. Sean is 12 years of age and Cate is 10 years of age. They attend the same school in Ottawa in French immersion. Both children were planned. The present access schedule is 2-2-3, with the Parties having joint custody of the two children. At the present time, the communication between the Parties is strained and problematic.

Mr. Kiska recalls that he and Ms. Moore met in 1996 and started cohabitating during the fall of 1997. Ms. Moore recalls starting to date in 1995. The former couple agrees that they separated more than once during their relationship, and attempted to reunite around April 2016. However, by November 2016, the couple separated for the final time. The parents entered an interim parenting agreement dated December 13, 2016. Both parents reside in Ottawa.

Mr. Kiska stated that the relationship between him and Ms. Moore deteriorated over time, related to her mental health issues. Ms. Moore reported that she was emotionally, psychologically, and sexually abused by Mr. Kiska, who denies any abuse. Ms. Moore has been admitted to hospitals a number of times since 2013 for mental health issues. She has been involved with the capacity board twice, which resulted in one Treatment Order. Mr. Kiska shared that there have been a number of incidents related to Ms. Moore's mental health instability that are concerning and that have impacted the children. He has called upon the assistance of the police and the Children's Aid Society to assist him with Ms. Moore's instability and the safety of the children.

The ongoing adult conflict between the Parties remains. The children are aware of the adult conflict between their parents and shared that previous to their parents'



separation, their parents argued often. The children report that since their parents' separation, the arguing has decreased and is much better.

**Custody – Access - Issues (& Responses)**

***Ms. Moore is requesting sole custody of the children, Sean and Cate Kiska, and that supervised access occurs via third party between the father and the children. She is amenable to the present access schedule consisting of 2-2-3.***

***Mr. Kiska is requesting sole custody of the children, Sean and Cate Kiska. He is requesting that the present access schedule of 2-2-3 be maintained.***

***It should be noted that both Parties originally requested joint custody. However, with the ongoing adult conflict, the Parties changed their request to sole custody during their final interview.***

**Ms. Moore raised the following issues and concerns:**

- She questions the father's ability to parent, as he has refused to support Cate's academic needs and her tutoring this summer. *It is the father's opinion that his daughter has time ahead of her to catch up and that she should benefit from the summer months. He does not believe that Cate requires tutoring during the summer and that providing her with supports during the next academic year would be sufficient.*
- She is concerned about the father's behaviors with Cate, as the father will sit in bed with Cate, while watching a movie, and stroke Cate's hair. Ms. Moore adds that the father has also hugged Cate with his hands touching the side of her breast. Additionally, Cate has served her father coffee and toast in bed. The mother is of the opinion that the father is treating his daughter as he would his "girlfriend". *The father denies that he is treating his daughter as a girlfriend. The father shared that he has a close relationship with both his children and is affectionate towards them. He feels this is an indication of the mother's mental health and how it can impact the children, and his relationship with the children, as the mother seems to think of the worst of him.*
- She is concerned with the father's manipulation towards Cate and is of the opinion that the father is creating similar situations with Cate that he has done with Ms. Moore. For example, Ms. Moore explained that messages were sent in Cate's name that Cate adamantly denies sending. Another example is when Cate's glasses went missing. According to Ms. Moore, Mr. Kiska had Cate's glasses but blamed Cate for misplacing them. However, Cate reported that her



father was cleaning them at the house and then placed them in his shirt pocket. Upon arrival at school, Cate asked for her glasses and her father replied that she had them and that he gave them to her at the house. Cate was adamant that her father last had the glasses in his shirt pocket and never gave them to her on the way to school. Ms. Moore arranged to replace Cate's glasses at her own expense, as Ms. Moore felt that Cate's glasses are essential for her, especially given her eye condition. Ms. Moore did not want Cate going to school with a patch over her eye at her age, and especially given Cate's anxiety and school drama. *The father is of the opinion that he gave the glasses back to Cate at the house and that she forgot. Regardless, the father is concerned about how a minor incident, such as misplacing glasses, became a huge issue, and how he is being blamed again by the mother.*

- o She is concerned that the father will continue to perpetuate the ongoing adult conflict to trigger a psychotic episode on her part, which has been Mr. Kiska's pattern. *Mr. Kiska stated that he is not trying to "trigger" Ms. Moore, and that she makes up allegations and blames him for all her problems, and does not hold herself accountable for events that happen in her life.*
- o She is concerned that the father will continue to provide false information regarding her to those who will listen, including professionals. She cites that when she was admitted for a psychotic episode in 2013, Mr. Kiska made alleged false statements to medical professionals, police, Children's Aid and others that have created a false representation of her, and that have been detrimental to her and her children. She is of the opinion that Mr. Kiska's intention is to get sole custody of the two children by damaging her character and using her mental health as the rational. *The father is of the opinion that the information he provided at the hospital in 2013 was accurate. He was being supportive and wanted the best for the children and Ms. Moore, whom he loved very much then. The father is of the opinion that Ms. Moore's mental health is unpredictable, and as such is a risk to the children.*

**Mr. Kiska** raised the following issues and concerns:

- o He is concerned that the mother is unable to manage her mental health challenges. He cites that the mother accused him of placing bacon on her doorstep, being involved in her LinkedIn account, and involved with her aps on her electronics. He is concerned that although the mother is involved in counselling with Dr. Jackson, whom Mr. Kiska has no "credence in", that she is not getting the support she needs. *The mother received a number of diagnoses that demonstrate the difficulties with diagnosing mental health. However, she stated that her consistent and more recent diagnosis is Brief Psychotic Episodes. The mother adds that she is involved with regular supports and counselling, and*

*has on her own accord attended the hospital and requested to be admitted. Her episodes are triggered by the stress related to the ongoing conflict between her and Mr. Kiska. She alleges that Mr. Kiska is using "gaslighting", which has also been suggested by Dr. Jackson.*

- *He is concerned with the overabundance of inappropriate and accusatory communications from Ms. Moore. The father shared that Ms. Moore is abrasive and critical in her perpetual emails to him, and that she has sent the same emails to others, thus involving them in the family's personal affairs, and tarnishing his reputation and possibly impacting the children and their relationship with those individuals. The mother acknowledges that she has sent emails that have been aggressive in nature but is of the opinion that her emails protect her should anything occur to her or the children, which Dr. Jackson is supportive of. She was advised by Dr. Jackson to change her style in her communications, along with who she sends her communications to, which Ms. Moore reports having done more recently.*
- *He is concerned with what the children witnessed last August, September and October, and how these events may negatively impact them. The mother shared that the situation at Best Buy was unfortunate and that Cate was not present at the time the police arrived. There was an incident when the father was called to pick up the children at the hospital at 05:00 in the morning. The mother attended the hospital on her own accord to be admitted and was concerned at that time for the safety of children if returned to the father. The mother explained that she has developed insight in to her illness and has attended the hospital on her own accord for admission or supports. She has additionally asked the Children's Aid Society to keep her file open to support the children and their needs. She adds that the father has been escalating the situation to trigger admissions, so that he can make the argument that he should have sole custody. The mother feels that if the father is so concerned about the children, that he would stop triggering her, should financially contribute for Cate's tutoring and her replacement glasses, none of which he has done.*
- *He is concerned that the mother involves the children in the adult conflict, as she has taken Cate to court in January 2018 and has shared information relating to the custody access with the children. The mother has not involved the children in the ongoing adult conflict. The children are aware of the conflict between the parents. The mother has kept all her documents away from the children and feels the children should not be involved. However, both children are smart and observant and are aware of the situation.*
- *He is concerned that the mother blames him for everything including Cate's mathematic challenges. The mother explained that the father has been triggering her to have psychotic episodes, so in effect he is to blame for the perpetuated*



stressors. With regards to Cate's mathematics, the father has made it quite clear that he is not supportive of summer school for Cate, even with the teacher's recommendations, Cate's report cards and the assessment that indicates that she is almost two years behind and needs supports.

- o He is concerned that Ms. Moore's delusions may be directed to Sean as he ages. The mother is not concerned about her delusions being directed towards the children. She feels that the father is trying to create a situation in order to get custody. This is a made up concern and shows how desperate Mr. Kiska is to create a false representation of Ms. Moore's mental health illness.
- o He is concerned as Dr. Jackson and Dr. Mercer only have one side of the story. He feels that Ms. Moore isn't providing these doctors with all the "real" information. The mother has been upfront with her physicians and suspects that Mr. Kiska would like to have the opportunity to meet with her physicians to convince them that his perception and information is the truth. She has provided documentation to Dr. Jackson demonstrating the lies that Mr. Kiska has made about her.

#### INTERVIEWS WITH MOTHER

Ms. Moore shared that she was born and raised in Ottawa. She graduated from high school and attended one year at Sheridan in retail management. Ms. Moore reports that she graduated with Honors with a Bachelors in Business at Wilfred Laurier and is a Chartered Financial Analyst.

Ms. Moore explained that she left home at the age of 16 or 17. She was involved in shoplifting. She reports that she slit her wrists and was involved with CHEO for a brief period. Ms. Moore has a sister in Kingston and another sister who resides in Ottawa. Her parents remain together and reside in Ottawa. Ms. Moore explained that her relationships with her family members are presently strained due to the adult conflict between her and Mr. Kiska, who has been actively trying to convince her family members that she is mentally unstable. Ms. Moore added that Mr. Kiska has gone so far as to approach her family members to support his position that she is unstable. He has additionally asked her father to have her deemed incapacitated.

Ms. Moore explained that Mr. Kiska has been abusive towards her for a long time and that she did not recognize it at first. She accuses Mr. Kiska of "gaslighting" and providing false information to the professionals that she has been involved with. According to Ms. Moore, Mr. Kiska gave false information that resulted in her being diagnosed with Bipolar in 2013. This has resulted in her misdiagnosis, which has been



problematic, as this misdiagnosis has been referred to and applied with her other hospital involvements.

Ms. Moore shared that she has had several hospitalizations since 2013 and has been assessed by several physicians. She does not deny that she has experienced psychotic episodes and states that these have been triggered by the stress of the custody battle between her and Mr. Kiska, and also by his behaviors. Ms. Moore explained that the alleged abuse by Mr. Kiska is not so evident. She explained that in order to protect herself, she has copied others with her communications to Mr. Kiska, which Dr. Jackson is aware of and supports. Ms. Moore explained that recently her communications have been limited to those she trusts.

Ms. Moore has compiled documents to support her allegations against Mr. Kiska, which she reports Dr. Jackson has seen and believes her. Mr. Kiska has made claims regarding Ms. Moore's behaviors that Ms. Moore has evidence to the contrary. She has alleged that Mr. Kiska and his counsel have lied to the Judge.

With regards to her involvement with the justice system, Ms. Moore reports being "apprehended" by the police in 2013 and 2014. She denies having any convictions. These incidents are related to the stress of the ongoing custody battle and have been brief in duration.

As for substances, Ms. Moore explained that she tried marijuana as a teen and disliked it. She enjoys wine when the children are in bed, but does not drink to excess.

Ms. Moore reports being involved in supports and counselling, and remains in contact with Dr. Jackson on a regular basis. She reports having developed insight in to her mental health, and has developed and continues to develop strategies and coping skills to support her mental health.

Ms. Moore shared that Cate has anxiety and was considered "blind" with her right eye. She wore a patch for some time and now has prescribed eye wear. Cate can be defiant at times, which results in a time out. She is also known to "lie". As for Sean, Ms. Moore explained that Sean is quiet and although she tries to engage him in sharing his feelings and such, Sean shares little. Although Sean and Cate have some minor disputes now and then, they remain very close and support one another. They are also very protective of each other.

Ms. Moore explains that she "lost" her family, friends, and professional contacts, and has been unable to secure work, which has resulted in financial struggles.

### Parenting Plan

Ms. Moore shared that she has been and will continue to try to secure employment. She is considering a number of options but acknowledges that she has not been successful as yet. She has no plans to move from Ottawa and will continue to be present for the children and support their needs, including paying for Cate's tutoring alone if Mr. Kiska continues to refuse to contribute. She recognizes that the children have a close relationship with their father and will ensure that the children have a healthy and safe relationship with him and his family. She has developed a safety plan in the event that a psychotic episode develops. Ms. Moore further plans on remaining involved with Dr. Jackson and seek supports, including hospital admission when indicated. She hopes that she and Mr. Kiska will resolve their issues soon and that the family can heal and move forward.

### INTERVIEWS WITH FATHER

Mr. Kiska was born in Hamilton and raised in Ottawa. He graduated from high school and attended Carlton University in business, followed by a Master in Business in Burnaby. He is a Chartered Professional Accountant (CPA).

Mr. Kiska has two sisters that reside in Ottawa and with whom he has a good relationship. They have been supportive with regards to the custody situation and Ms. Moore's mental health issues. Mr. Kiska reports that his parents are deceased. As a child, his father had a pizza franchise and Mr. Kiska worked during various periods and occasions, such as the Calgary Stampede and carnivals. He reports leaving home when he attended university.

Mr. Kiska denies involvement with the justice system with the exception of requiring their support related to Ms. Moore's mental health issues. Mr. Kiska explained that he drinks a beer a day or a couple of glasses of wine with pizza, but never to excess. He denies mental health issues.

Mr. Kiska expressed that he and Ms. Moore had a very good life and partnership with their consulting business prior to Ms. Moore's mental health illness. They secured government contracts, among others. He shared that he loves his wife but that her mental health illness and her repeated accusations and allegations against him have created a strained relationship that has resulted in limited productive communications and problematic co-parenting. He feels very hurt by her actions. His main goal is to protect the children and makes sure they are safe.



Mr. Kiska is of the opinion that the children need their mother in their lives, but wants to make sure that their mother is stable and able to care for the children, and that the children are not negatively impacted by her mental health challenges. With the repeated hospital admissions and the mother's continued denial of her illness, it's challenging to trust that the children will be safe in her care, especially when the mother's psychotic episodes are unpredictable. The father shared that the children have been through a lot this past August, September and October. They have witnessed the involvement of the police and the hospital with their mother, which has likely negatively impacted the children. Mr. Kiska shared that it isn't a "brief psychotic episode" when it lasts for five months. He does not feel Ms. Moore is compliant with her medications and that she appears to be vulnerable in the fall.

Mr. Kiska added that from March 3 to the 5<sup>th</sup>, 2013, Ms. Moore was formed for 72 hours for a psychological assessment at the Ottawa civic. She was admitted for six weeks from April 6 to May 28, 2013 and diagnosed with bipolar at the Ottawa Civic. She was subsequently formed for 72 hours from July 3 to the 5, 2014 for a psychological assessment at the Montfort hospital. She was additionally formed from July 9 to August 28, 2014, and a Community Treatment Plan was ordered. On October 12, 2015 Ms. Moore voluntarily admitted herself to the hospital.

Mr. Kiska shared that Cate has special needs for her vision. She is described as having a "lazy eye" and wore a patch on her right eye, but now has glasses. She also struggles with mathematics at school. Mr. Kiska feels the school is supporting Cate, and that extra math and the tutoring can be accomplished during the upcoming academic year and not during the summer. Mr. Kiska wanted to wait for the results of Cate's assessment and see "where it lands" before making any decisions. He shared that he was advised by Dr. Matheson that without a diagnosis, Cate is not eligible for an IEP.

Mr. Kiska shared that both children were involved with Dr. Matheson in the past. As a whole, he is of the opinion that it would "probably benefit" Cate to see Dr. Matheson within the family context, as she is "remorseful that her parents aren't together". Mr. Kiska is "ok" with the counselling and shared that Cate is open to seeing Dr. Matheson again.

With regards to Sean, Mr. Kiska is of the opinion that Sean could benefit from counselling but that "he isn't chatty like Cate". Mr. Kiska has encouraged Sean to go out with his friends on the weekends. Sean enjoys camping and Mr. Kiska would like Sean to have the opportunity to camp, but is uncertain as to Ms. Moore's position on that. With regards to practicing his sax, Mr. Kiska explained that Sean is not passionate about playing his saxophone, although he enjoys it. He did not play in a band this past



year. He told his son that "if your goal is to be in a band, then it's up to you. I can't push you".

Mr. Kiska shared that he prefers the present access schedule, as he feels a week is too long for the children and Ms. Moore. He added that it is also the children's preference. He reports a close relationship with the two children and added that although Ms. Moore has made claims regarding his actions with Cate, such as being in bed with her, Mr. Kiska explained that Cate will ask him to lie in bed with her to watch a movie. His recognizes that his time doing so is limited, as the children get older and become more independent and involved with their friends.

Mr. Kiska referred to his involvement with Dr. Cardoso as the "best experience I've had". He reports that there is good dialogue, and Dr. Cardoso is direct with Ms. Moore and calls Ms. Moore "out". According to Mr. Kiska, Dr. Cardoso stated that the mother has "residual delusions". Both parents continue to attend together. Mr. Kiska shared that "if we had this in 2013, we would likely not be here today". His goal with the counselling is communication and co-parenting, while Ms. Moore's goal was covert: to have the father assessed. The father has paid for the sessions.

Mr. Kiska stated that "moving forward, if with Dr. Mercer nothing has changed with Deirdre, why would I expect anything to change. I thought I would be in a better position separated". Mr. Kiska wants the children to have their mother in their lives if the mother is on a treatment plan and is compliant with the treatment plan. However, Mr. Kiska feels that this does not appear to be the situation with the mother.

#### Parenting Plan

The father plans on remaining in Ottawa and in the same residence, if he is not forced to sell the family house. He will continue to manage his consulting business and work at securing contracts. He will make sure the children have relationships with their mother and her family members, as well as with the paternal family members. He will engage the children in community and school events, and continue to support and be present for his children. Most of all he will love and protect them.

#### OBSERVATION OF INTERACTION BETWEEN THE MOTHER & THE CHILDREN:

The observation visit with the mother and the two children occurred at the mother's residence. The mother resides in a bungalow in a residential area of Ottawa. The home is clean and organised, with each child having their own bedroom. There are documents regarding the custody battle in the dining area that are covered.

Upon the Clinician's arrival, Cate was in the kitchen with her mother making breakfast: waffles from a family recipe. Sean was helping intermittently and also showing off his collection of masks. Both children also played with their dog and cat intermittently.

As the mother and daughter were preparing the waffles, the mother praised the daughter and encouraged her as well. She hugged and touched Cate affectionately, which Cate accepted. The mother provided suggestions that Cate accepted. The two presented as happy and having fun making the waffles. Sean assisted with preparing the table with cutlery, maple syrup, strawberries, milk and such. The mother would touch Sean affectionately on his shoulders as he retrieved the various items to add to the table. Sean was present in the kitchen while the mother and daughter prepared the waffles, and looked on as they worked. He joined in intermittently. Cate and the mother prepared the whipped cream and they all sat at the table together to eat. During the meal time, the mother and the children were engaged in various conversations. The children presented as happy, with smiles and jokes.

After the children and the mother cleaned up the table and the dishes, the three went outside to play softball together. Each child took their turn at bats and enjoyed playing. The mother gave encouragement and praise to the children.

#### Summary:

The mother provided praise and encouragement, and demonstrated patience with Cate in preparing the waffles and whipped cream. The children worked well together and there was no conflict between them. There was an atmosphere of cooperation and calm. They presented as happy and enjoying themselves: smiling and laughing together, and telling jokes. Cate and Sean were receptive to their mother's affection. The children responded to their mother's directions. There was continued conversation between the three throughout the observation visit. The children were well behaved and there were no concerns noted.

#### OBSERVATION OF INTERACTION BETWEEN THE FATHER & THE CHILDREN:

The observation visit with the father and the two children occurred at the father's residence. The father resides in a residential area in Ottawa. The children have their own bedrooms. The home is relatively clean with documents on the table and kitchen counter that are flipped over on their underside.



Upon the arrival of the Clinician the father and the two children were outside. The three engaged in several activities while outside. Sean was encouraged to pick up the leaves and twigs in the front area, and also played making bubbles with his father. Cate played in the hammock, practiced her cartwheels, and drew on the driveway with chalk, with her father adding one of his own drawings of a flower. The three also played softball together for a short time, with each taking their turn at the bat. The father provided praise and encouragement to the children during the softball, but also to Sean while he was cleaning up the yard.

The father referred to Cate as "babe" and Sean as "Bucky". He maintained a safe environment when the children climbed a tree in the front yard. The father reminded them not to climb too high and to be careful with the size of the branches they were climbing on.

After being outside for a period, the children and their father went inside. Cate wanted to make cupcakes. She and the father took out the equipment and supplies to make the cupcakes. Sean wanted to help but Cate did not want her brother to be involved. The father encouraged Cate to allow her brother to be part of the process. Sean attempted to help several times, which resulted in arguments between him and Cate. Despite the father's encouragement to allow Sean to participate, Cate was adamant in her position not to allow her brother to assist, and argued with her father. In the end, Sean was not part of the cupcake making process.

Sean started to display attention seeking behaviors, such as teasing Cate and climbing into a cupboard. His father directed him to stop teasing his sister. However, Sean did not respond to his father and kept on teasing his sister. An argument ensued between Sean and Cate. The father told the children to "get along together" and did not interject. The father assisted Cate with making the cupcakes and provided Cate with praise. The father attempted to show affection to Cate, with a hug while she was preparing the cupcakes, but Cate pulled away.

Sean walked around the kitchen aimlessly. He attempted to help with the cupcakes but was rejected. He climbed in to a cupboard in the kitchen where Cate was working. Despite his father's repeated directions to come out from the cupboard, Sean remained. Mr. Kiska had to be physically remove Sean from the cupboard. Sean walked around the kitchen looking for something to do. The father encouraged Sean to practice his saxophone, but Sean wasn't interested. Sean asked to go to his bedroom but his father wanted him to remain with them. He continued to walk around the kitchen area and then started to jump over the couch and roll onto the other side. This turned in to a game, and Cate joined in. The two played well together with some intermittent pushing and



complaining about the other. Initially the father told the children not play on the couch, as they could fall and get hurt. However, he watched them play and told them to play carefully so that neither one falls on the other. The two children laughed and had fun.

#### Summary:

The children presented as happy and engaged with their father for the outdoor activities. The father provided praise and encouragement to the children, and attempted to show affection to Cate while she was making the cupcakes. However, she pulled away from her father. He assisted Cate with her cooking. The children did not work together despite their father's encouragement, and the children argued. The children did not appear to respond to the father's directions and Cate made the final decision as to whether Sean could assist with the cupcakes or not. Sean appeared to be put aside, as Cate and the father worked together leaving Sean walking around aimlessly. The atmosphere in the kitchen was somewhat unsettled with the conflict between the children, the arguing, Sean's behaviors, and the repeated directions from the father that were dismissed by the children.

#### THE CHILDREN:

##### **Cate Kiska**

Cate was interviewed in private at each of her parents' residences. She was forthcoming with information and presented as comfortable and articulate.

Cate is ten years of age and attends school in French immersion in grade 5. She described her teacher as "strict", as she does not let Cate go to the washroom but Cate is allowed to have a water bottle. Cate shared that she is social and enjoys school, with the exception of gym, as there is no learning. She adds that she has a lot of friends at school but that there is a lot of drama.

Cate is aware that she is behind in mathematics. She spoke of being involved with tutoring and shared that she enjoys it and doesn't mind missing her summer. She was excited to report to this writer that she received 100% on her most recent work and also an 82 or 88% on another assignment. She described the tutoring staff as "nice and great to work with". Cate spoke of her tutoring experience in positive terms.

Cate enjoys drama, gymnastics, chess, music, diving and cooking. She enjoys watching cooking shows and trying new things. She shared that she has panic attacks but can usually control them.

At home, Cate informs that she and her brother get time outs if they don't listen, but those are rare. Cate recognizes that she can be argumentative with her mother but adds that she will respond to her mother's directions regardless of her position. Cate explained that her mother doesn't allow for Cate and Sean to argue or fight, and insists that they work together. At her father's, Cate shared that this is not the case and that she and Sean argue and don't get along all the time, as Sean will tease her. She informed that her father encourages her and Sean to get along but doesn't do anything when they don't. According to Cate, they practice their instruments while at their mother's but don't when they are at their father's.

Cate was asked about her glasses. She reported that one morning she was getting ready for school and her father cleaned her glasses for her. On the way to the vehicle, she asked her father if he had her glasses, which he stated that they were in his shirt pocket. Once they arrived to the school, Cate asked her father for her glasses but her father told her that he did not have the glasses and that Cate had them at the house. Cate was adamant that her father had them and did not give them to her. She was also confident that he told her that he had them in his shirt pocket.

Cate shared that she remembers the situation at Best Buy with her mother. She reports being anxious but not scared. She wasn't sure what was going on and that it was the yelling that triggered her anxiety. She was happy to see her father and go home with him. As for the hotel situation, Cate explained that she enjoyed her time with her brother and mother, and did not realize that something was wrong. She thought it was a vacation.

Cate informed that she is not afraid of her mother or her father. She wants to continue with the present access schedule. She reports that the two residences are very different, with her mother creating more structure and limitations than her father. She added that she is happier now that her parents are separated and reside in separate residences. She reports that prior to their separation her parents would often argue, and that she and Sean could hear their parents. Cate added that prior to her parents' separation, she would at times hide in the closet and cry when her parents argued. Cate advised that she and her brother are aware of the ongoing adult conflict, as she has heard both her parents talk about the adult conflict at one time or another.

#### **Sean Kiska**

Sean was interviewed in private at each of his parent's residence. He initially presented as cautious and less forthcoming than Cate. After conversing for a while, Sean appeared to be relaxed. He was articulate.



Sean is twelve years of age and in grade 6 at the same school as his sister. He described school and his teacher as "ok". Sean plays the saxophone and the piano, and has played the clarinet in the past. He is not very interested in practicing but recognizes that he needs to practice to maintain or get better at playing the instruments. He hopes to play in the band at school in grade seven. He was involved in the school band, and is involved in drama, which he enjoys, as well as basketball, badminton and swimming.

Sean shared that he has friends at his mother's residence but not at his father's. He enjoys spending time with his friends. He added that his father engages with him and his sister, but his mother engages more. While at his father's Sean shared that he watches the television or is on electronic devices, which is mother limits.

Sean explained that he teases his sister in play and that the two argue at times. He added that his father doesn't direct them to stop, he "asks" them to do what he wants, but in the end they do what they want. However, with their mother, Sean explained that they listen to their mother and work together. He reports that he and his sister rarely get time outs, as they respond to their mother's directions- she is more serious, which is "not necessarily a bad thing". He practices his sax at his mother's and keeps his room clean, and gets along with his sister.

#### DISCUSSION:

Sean is twelve years of age and in grade 6 at a French immersion school in Ottawa. Although Sean has no identified special needs, his report cards note some challenges. Sean presented as quieter than his sister but engaged with this writer. Nadine Crowley, who provided counselling to the family, shared her concerns regarding Sean, as he tends to bottle his feelings up and has been aggressive at times.

Cate is ten years of age and in grade 5 and attends the same school as her brother. She has prescribed eye wear. She has experienced what she refers to as "panic attacks and anxiety". Academically, Cate is not formally identified to have special needs. However, she was recently assessed and scored very low in Fluid Reasoning with 3 percentile, and well below average at 8 percentile in Math Fluency. Cate has significant struggles with inattention that significantly impacts her functioning at home and at school. Dr. Matheson notes that without significant and intensive one-on-one support, Cate would not be accessing the curriculum and meeting grade level expectations successfully. The report also indicates that Cate is described as "increasingly withdrawing from the classroom discussions and group assignments". Additionally, it is noted that over the past three years, "Cate's challenges with inattention have increased



significantly". Cate is described as "anxious and having difficulty coping with big feelings and struggles with sadness and over-excitement".

Ms. Moore was instrumental in organizing Cate's assessment and tutoring in order to support Cate's academic needs. Ms. Moore felt that it was essential that Cate develop a better understanding of the mathematic concepts and language before attending high school, as she will be in grade 6 in September 2018. Mr. Kiska was not in support of tutoring during the summer months and felt that Cate could catch up in grade six. As such, Cate attends tutoring only during the times she has scheduled accesses with her mother. The tutoring was paid for by the mother. In speaking with Cate about her tutoring, she expressed excitement with the results with her assignments and shared that she doesn't mind attending tutoring during the summer. She spoke of her tutoring in positive terms. Such a positive experience, added to her successes in her academics, may impact Cate's self-esteem and confidence, and decrease her anxiety, and support her academic performances. It would be beneficial for Cate to have a re-assessment after grade six, to ascertain the progress and the supports, if any, she may require in high school.

Sean and Cate were articulate in their interviews. They are reported as healthy by their family physician. They enjoy a variety of activities at school and in the community, and with their parents. The children shared that they love their parents and want to maintain the present access schedule. Neither is fearful of either parent. With regards to incidents that have involved their mother, the children are aware of their mother's challenges and state that they are not fearful of her. Cate shared that she was embarrassed at Best Buy and isn't interested in returning to that specific store. She acknowledged that she was crying but it was her anxiety and embarrassment. She does not have concerns with going places with her mother. The children shared that they enjoyed their time with their mother at the hotel and looked at it as a short vacation. They acknowledge that they missed their father and weren't too sure what was going on. It was only after they were spoken to that they realized that something may have been wrong.

The children shared that their mother is more engaged with them than their father. There is more structure and limitations with their mother, such as limited television and electronics, which is not the case with the father. Both children acknowledged that their mother does not allow them to argue or fight, and that she encourages cooperation. They do homework, when they have some, which is almost never, and practice their instruments. They work together and have fun together. At their father's the children argue, tease each other, and at times have pushed one another. Although their father tells them to stop, they don't, and the father does not interject.

During the observation visit, the father presented as taking a passive approach to parenting and allowed Cate to decide whether her brother could help or not. Sean was left out of the activity, as he watched his sister and father work together without him. The children did not appear to respond to their father's directions. There was conflict at the father's. This is not the case at the mother's, where the children follow their mother's directions. Despite their bickering, the children appear to have a close relationship.

The children shared that their parents used to argue a lot when they resided together. Since the parental separation, it is much better. In speaking with the children, they present as protective of both parents. The children are aware of the present adult conflict and have witnessed incidents involving their mother. However, the children are no longer attending counselling. Given the ongoing adult conflict, it is likely that the children would benefit from additional counselling. Although Sean did not open up as much as Cate during his past counseling sessions, with time he may become comfortable and engage in the supports. In the past they were involved with Nadine Crowley, which may smooth Sean's receptiveness to counseling.

The mother does not deny she has mental health illness of Brief Psychotic Episodes. She has been admitted to hospitals since 2013, some of which she attended on her own volition and asked to be admitted. She has also been involved with the capacity board in 2014. Dr. Mercer wanted to highlight that although the initial diagnosis for Ms. Moore was Bipolar Affective Disorder, the mother presents as hyperthymic as her general state, and she has experienced brief psychotic episodes related to the stress she has experienced, and has responded well to medications. During the period that Dr. Mercer was involved with the mother, Dr. Mercer did not have concerns regarding the mother's involvement with the children.

In July 2015, Dr. Mercer shared that at that time, the diagnosis of Bipolar wasn't a definitive diagnosis. The mother was experiencing much stress related to the issues with her husband. The diagnosis of psychosis NOS (not otherwise specified) was considered and the mother's presentation appeared to be more in line with such a diagnosis. In June 2017, the mother was seen at the request of her family physician, Dr. Chow. She was responding to medications, which had been started by her family physician. The mother did not present as distressed, and she was not psychotic.

More recent hospital records note that during October 13, 2017 the impression related to Ms. Moore's diagnosis was "difficult to determine. Past diagnoses have included bipolar + schizoaffective disorder vs brief psychotic episodes. The preferred diagnosis is Brief Psychotic Episodes".



Dr. Chow spoke in positive terms of Ms. Moore and described her as "extremely intelligent" and a "high functioning individual". Dr. Chow added that Ms. Moore has been open with her as to how she uses her prescribed medications.

Dr. Cardoso is of the opinion that Ms. Moore is stuck in a "loop" and feels she is persecuted by Mr. Kiska. Dr. Cardoso feels this may be residual from Ms. Moore's "psychotic breaks". The relationship between Mr. Kiska and Ms. Moore is described as "toxic" by Dr. Cardoso, and marred with "stone walling and defensiveness". Ms. Moore appears to make progress within the sessions, but Dr. Cardoso is of the opinion that she often regresses once she leaves his office. Ms. Moore "presents as wanting to engage but there appears a capacity issue, as she reverts to persecutory ideas" with a "delusional flavor". With regards to "gaslighting", Dr. Cardoso stated that "there might be a kernel of truth but it is difficult to flush out". He feels that the mother is struggling with her "initial wound" and has difficulty seeing her role in the couple's conflict. Dr. Cardoso describes the couple's conflict as "legal warfare" and adds that this adds tension to the relationship and tension in to the homes. "This warfare is not useful". He acknowledges that this couple is highly intelligent and loves their children very much. "The family needs to come together and heal with the transition, and learn to navigate and communicate amicably".

Ms. Moore has engaged in supports and remains involved in counselling on an individual basis but also in couples' counselling with Dr. Cardoso. She has been proactive and created a safety plan for the children, and has attended the hospital and requested to be admitted. She has developed insight into her illness and continues to work on coping strategies and healing. She has also asked the Children's Aid Society to keep her file open to allow supports for the children.

Ms. Moore presents as the stronger parent. She was the children's primary caregiver prior to the couple's separation; the children respond to her directions; and she sets limitations and structure for the children that support their needs, which does not appear to be present with the father. The children have echoed these differences between the parents, which have also been observed by this writer. Ms. Moore has been proactive in having Cate assessed and securing tutoring for Cate. Additionally, Ms. Moore is paying for the tutoring without the support of Mr. Kiska. The mother recognized that tutoring for Cate may have a positive impact on Cate on many levels, such as her confidence and self-esteem, and her academic performance and successes. However, the father did not support tutoring during the summer. This would have left Cate with trying to successfully achieve 2.5 years of academic curriculum in one academic year. This would have likely created more stress and anxiety for Cate, and would likely have been a daunting task, one that the father minimized. Cate's positive experience with tutoring

will likely impact her self-confidence, self-esteem, decrease her anxiety and increase her academic successes.

Mr. Kiska has no mental health issues and no addictions. He has not been involved with the justice system other than reporting Ms. Moore or asking for help. He is self-employed and resides in Ottawa. Mr. Kiska, in his final interview, was not objecting to Cate being assessed. He wanted to see "where the assessment would land, and then see where to go from there". However, once the assessment noted Cate's challenges, the father was not supportive of Cate attending tutoring during the summer months. He is of the opinion that Cate should enjoy the summer and catch up next year. He did not feel that the lack of tutoring this summer would make a difference for Cate. Mr. Kiska expressed his concern with the impact the mother's behaviors have on the children, and although the children have been involved in counselling in the past, he made no efforts to re-involve the children in counselling.

With regards to the Children's Aid of Ottawa, they have been involved on and off since 2013. They report that Ms. Moore has a diagnosis of Bipolar Affective Disorder Type 1 and it is noted that she does have paranoia that usually revolves around Mr. Kiska. It was also noted that there is ongoing contentious custody dispute between Ms. Moore and Mr. Kiska, with allegations made by each on a regular basis. The children did not disclose any safety concerns when in their mother's care, and Ms. Moore was in agreement to contact Mr. Kiska to come and pick up the children when needed. The file was closed January 2018.

Dr. Chow is of the opinion that the parental separation has been felt by the family members, who may still be healing. Dr. Jackson shared that Ms. Moore has been isolated from her family related to Mr. Kiska's actions and reportings, leaving Ms. Moore grieving the loss of her family relationships. The parents are described as very caring and loving, and involved with their children. They present as protective and having a close relationship with both children. However, the communication between the parents at this time is conflictual and problematic, and co-parenting does not appear to be an option at this time.

#### RECOMMENDATIONS:

1. Custody: It is respectfully recommended that the mother have sole custody of Sean and Cate Kiska.
2. Access: It is respectfully recommended that the present access schedule remain as 2-2-3, with the parent picking up the children for their access visit, or with the children taking the school bus.

\* Shared access is seemingly unavoidable until Moore is in a position to present evidence against Kiska. (see 20180317 letter from Ottawa Victim Services)




**Additional Recommendations:**

3. It is respectfully recommended that communication occur via [talkingparents.com](http://talkingparents.com) or any other means of communication in which both parents agree to in writing. The communications are to be strictly relating the children, such as appointments, events, medical and academic information, etc.
4. The children shall be involved in counselling and attend without the presence of the parents if possible. The counsellor will be informed of Cate's anxiety and Sean's limited interest in communicating his experiences. In the past the children had developed a rapport with Nadine Crowley, who may be amenable to meet with the children again. Ms. Crowley is familiar with both children, which may add some comfort for Sean.
5. The parents shall continue to attend couple counselling to work on their co-parenting skills and their communication.
6. The children shall be with their mother on Mother's Day from 14:00 to 19:00, and with their father on Father's Day from 14:00 to 19:00, regardless of the access schedule.
7. For Christmas 2018, the children shall spend the morning with the father until 13:00 and the afternoon with the mother until 19:00, and return to their 2-2-3 schedule thereafter. This schedule shall alternate yearly, allowing each parent time with their children on Christmas Day.
8. The 2-2-3 access schedule shall be maintained throughout the year. The parents shall be given the opportunity to have one week access with the children in July and one week access in August. Notice shall be provided to the alternate parent prior to May 1 of each year. The requested week must be agreed upon by both parties.
9. The access schedule and the transfers can be changed with the written agreement of both parents.
10. The mother shall remain involved in counselling until her counsellor deems it no longer necessary. The counsellor shall decide the frequency of the sessions, as long as this does not negatively impact the mother's finances. Should this occur, the mother shall seek and register with counselling services that are affordable.
11. The parents shall sign consents allowing them to have access to the medical and academic information, as well as any information pertaining to the children. Each parent shall be responsible to access the children's information.

12. Both parents shall have the right to attend all activities in which the children are involved in. The parents shall remain civil to one another and not discuss adult matters in the presence of the children or during these events.
13. The parents shall ensure that Cate attends her tutoring sessions regardless of the scheduled access. Her tutoring sessions shall continue until she catches up to the level she should be at. Both parents shall be responsible to ensure that Cate attends her sessions during the time Cate is in their care.
14. The parents shall ensure that the school is provided with Cate's assessments and progress, as well as any recommended supports and resources. An informal IEP may be recommended to assist Cate with her progress. It may be beneficial to have Cate re-assessed after grade 6 to ascertain her progress and any gaps that would require further supports.
15. The children are not to be involved in the adult conflict, and shall not be present during conversations regarding the adult conflict. Information pertaining to the adult conflict shall be stored in a location that the children have no access to.
16. The mother will develop a safety plan and share this plan with the father.
17. Should the children require medical attention, the parent present shall contact the alternate parent as soon as possible.
18. The family shall participate with the Family Services Ottawa, for the Parenting after Separation program.
19. A copy of this report shall be shared with the Children's Aid Society of Ottawa
20. The Office of the Children's Lawyer is amenable to being re-involved with this family.

Dated in Timmins the 11<sup>th</sup> day of July, 2018.

393 University Ave.,  
Toronto, Ontario  
\_\_\_\_\_  
Office of the Children's Lawyer

  
\_\_\_\_\_  
Katherine Bobula, R.N, BScN, MED  
Clinician



## **Schedule B**

**20190408 CYFSA Endorsement**

**of**

**Justice Calum MacLeod**

Even though the mother had not received any materials, did not have any access to evidence or was in any position to prepare/serve/file any materials due to an unlawful arrest and detention in the province of Quebec, he refused her an adjournment. Then, he lied in the court order by stating that she was in default.

**ENDORSEMENT**

under the Child, Youth, and Family Services Act  
Ontario Superior Court of Justice  
161 Elgin Street, Ottawa, ON K2P 2K1

Court File Number: FC-19-CP8Mother: Deirdre MooreDate: April 8 2019

Reference File # \_\_\_\_\_

Also Present:

*M. via  
telephone**CPW**F.*

C/CAS: I. MacDougall agent: B. Fisher  
C/M: \_\_\_\_\_ agent: \_\_\_\_\_  
C/F: W. Smith ✓ agent: \_\_\_\_\_  
C/OCL: D. Scholey ✓ agent: \_\_\_\_\_  
C/ : \_\_\_\_\_ agent: \_\_\_\_\_

Children: Sean Kiska DOB: May 8 2006 : Caitie Kiska DOB: Nov. 30 2007  
DOB: \_\_\_\_\_ DOB: \_\_\_\_\_

4<sup>th</sup> Appearance Overall ✓ PA Application Amended 2x  
2 Amended Appearance \_\_\_\_\_ SRA Application \_\_\_\_\_

Order Sought: 4 mos SO to F. Application Tab \_\_\_\_\_ Vol \_\_\_\_\_  
Amended Tab 13 Vol \_\_\_\_\_  
N.O.M. Tab \_\_\_\_\_ Vol \_\_\_\_\_

Services: M: MacB/A F: \_\_\_\_\_ OCL: MacB/A C/M: \_\_\_\_\_ C/F: MacB/A Other: \_\_\_\_\_

(name of appearance)

Ms. Moore called in today ~~April~~ and advised she is in a hospital in Sillery de Valleyfield in Quebec under an order of the Quebec court.

Although Ms Moore asks for an adjournment, because she says she has not seen the amended original application, she has not filed an Answer to any of the Applications and she has been aware of this procedy. She has been present in court on previous occasions.

It is not in the best interest of the children to adjourn the matter further. This is a final court order which will then be subject to review.

Findings made as ordered.  
order to go as signed.

August 6, 2019 at 9:00  
for status review.

(signature of Registrar)

L. MacLeod J.

- MACLEOD J. (signature of Judge)

B'15





**Superior Court of Justice of Ontario**

(Name of court)

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

Court office address

Court File Number  
**FC-19-CP000008**

**Form 25: Order  
(General)**

☐ Temporary  
☒ Final

**C. MacLeod**

Judge (print or type  
name)

**April 8, 2019**

Date of order

**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

**Children's Lawyer**

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

B<sup>2</sup>/5

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

The court heard an application made by (name of person or persons)  
The Children's Aid Society of Ottawa

The following persons were in court (names of parties and lawyers in court)  
Brian Fisher, agent for Tara MacDougall, counsel for the Society;  
The child protection worker;  
Wade Smith, counsel for the father;  
The father;  
Debora Scholey, counsel for the children  
The mother (by teleconference)

The court received evidence and heard submissions on behalf of (name or names)  
Parties present

**THIS COURT FINDS THAT:**

Statutory findings for both children are made in accordance with the affidavit filed by the father over the bench today.

The respondent mother, Deirdre Moore, is in default of these proceedings.

The children Sean Kiska and Cate Kiska, are found to be children in need of protection, pursuant to ss. 74(2)(b)(i); 74(2)(b)(ii); 74(2)(h) of the *Child, Youth and Family Services Act*.

**THIS COURT ORDERS THAT:**

1. The children **Sean Kiska** (DOB: May 8, 2006) and **Cate Kiska** (DOB: November 30, 2007) shall be placed in the care of their father, Jonathan Kiska, under the supervision of the Society, for a period of four months, under the following terms and conditions:

**For Both Parents:**

1. The father and the mother shall work cooperatively with the Society, follow through with the Society's recommendations, and allow the Society worker to have private meetings with the children in the home, school and community, on an announced and unannounced basis.
2. The father and the mother shall accept referrals to community support services as required.

The mother submits that MacLeod had this Order prepared before the hearing.



3. The father and the mother shall sign consents to share information with professionals involved with the family, as requested, in consultation with legal counsel.
4. The father and mother shall inform the Society of any change in the family constellation, change of address, circumstances or contact information.
5. The father and the mother shall refrain from discussing adult matters (such as court proceedings) in the presence of the children.
6. The father and the mother shall cooperate with one another to provide for the children as they see fit and inform the Society accordingly.

**For Ms. Moore Only:**

7. Ms. Moore shall attend her family physician and/or treating psychiatrist and any involved mental health professionals regularly and follow all recommendations, including counselling and medication, in regards to her mental health

II. Access to the mother shall be at the discretion of the Society and in accordance with the children's wishes.

III. Pursuant to s. 137 of the *Child, Youth and Family Services Act*, Ms. Deirdre Moore shall be restrained from the following:

- 1) Deirdre Moore, shall not attend within 500m of the residence of the father, John Kiska.
- 2) Deirdre Moore, shall not attend within 500m of the children's schools, unless prior approval is obtained in writing by the Society.
- 3) 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.

IV. 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.

V. This order shall remain in force unless it is varied, extended or terminated by the court.

VI. This matter will return for Status Review on August 6, 2019.

APRIL 8, 2019

G. MacLeod J.

B4/5

The mother  
has never  
had a  
"treating  
psychiatrist"

She has  
never had  
any  
chronic  
mental  
illness!  
TM

THERE  
IS  
ZERO  
evidence  
of  
mania,  
depression  
or ongoing  
psychosis.  
TM

Form 25: Order (General) (page 4)  
Court file number: FC-19-CP000008

*Date of signature*

*Signature of judge or clerk of the court*

B<sup>5</sup>/5



## **Schedule C**

**Samples of Evidence**

**regarding the 2019**

## **Eviction Scam**

The father (and Complainant) Jonathan Kiska participated in an eviction scam and the theft of everything that the mother owned.

c'15

SAGOTU Inc.

www.pfl.rocks!

SAGOTU Inc.

www.pfl.rocks!

SAGOTU Inc.





[illegible]

5:48 PM  
LE  
Lamah

Wed May 15, 2:11 PM

1. How much is the "eviction cost"? I have no issue with reimbursing Mr. Kaiddoon Habib Allah for his trouble.

2. Do you have Diego's e-mail address? He is not returning my calls.

3. Any questions?

Fri, Jun 14, 2:54 PM

June 14  
Lamah

I need a key for Claymor.  
(I'll have to pay for a hotel, it's on you)

Are you going to leave one in the mailbox tonight?

who is this please

Scroll up

It's the same person you've been ignoring since February

don't contact me any more please

Fri, Jun 14, 10:55 PM

Why not?  
You think you can participate in the illegal eviction of me and then what? Just expect me not to expose you for what you've done?

Deirdre, please note that I am no longer pursuing the matter with Squidoo Properties. I have received \$8,606.40 including rent owed \$8,606.40 including rent at the end of May and eviction cost. Landlord address 710-1735 RIVERSIDE DRIVE, OTTAWA, ON K1G 3P7.

5:49 AM  
No Service  
From: Jonathan William Patrick Kiaka >  
Hide

Re: My plans for May 27-31  
May 27, 2019 at 3:35 PM

Deirdre

I have spoken with Diego.  
You have been evicted.  
They have followed all the rules.  
You are not the legal owner of Sean's masks or anything else in the house.  
Sorry to tell you that.  
Also, I plan to buy the contents of your house unless you send them payment in full by end of day tomorrow (May 16).  
I will not have Sean and Cate further hurt by your selfish and inconsiderate actions.  
Once I own everything from Claymor I will be happy to discuss arrangements in which you may purchase some of your personal effects from me.

You have Diego's number and I suggest you call  
Saturday, May 25, 2019 10:34 AM  
diego@disparalegal.com

Subject:

Dear Diego,

Would you kindly clarify our current situation for me?

I interpret your e-mail as follows:

"You providing me with the contact information of the landlord whom you represented to request rent money from me is now a conflict of interest."

"Hire a lawyer to understand my rights."

"Contact my former landlord."

Ahem: Diego, my former landlord is your former client.  
I am TRYING to pay him.

Why won't you tell me how I can get his money to him?

October 9, 2019

(ec) 7/1

Mr. Kaldoon Habib Allah

710-1735 Riverside Drive, Ottawa ON K1G 3P7

Re: My possessions from the 3-bedroom home at 1466 Claymar Avenue

Dear Mr. Allah,

I believe that I was robbed of \$500,000 of, mostly irreplaceable, personal possessions during May-June 2019 by you - either directly/knowingly or indirectly through your agents, Lamah El-Rages and/or Diego Fernandez-Stolls. Please fax to me\*:

1. The location of my property and the steps that are now required to retrieve it and
2. The legal documentation, if any, that was utilized to deceive the court for an eviction. (I did not receive any and I would like to ascertain which sections of the Criminal Code were violated when the robbery occurred.)  
(e.g. S. 372(1)(1), 330 1(a), 375, 21(i), etc., etc)

I require your prompt reply: this letter will form part of my affidavit for two upcoming court appearances. Also, kindly remain available during December 2-6, 2019 as I intend to subpoena you to testify should my current "criminal allegations" by narcissist ex-husband (Jonathan Kiska, whom I believe Diego knows) actually go to trial.

P.S. Contact your colleagues listed below for additional pages required to complete your 18-page package.

incl. (ec) 1-2, 7-8/3, (t)+(m) 7-8/10 6 pages

cc Diego Fernandez-Stolls, 3639 County Road  
Addison, ON K0E 1A0 (paralegal)  
(ab) 3-4/3, (t)+(m) 5-6/10, (ec) 3-4/8

cc Lamah El-Rages, 344 O'Connor Street  
Ottawa, ON K2P 1W1 (ReMax agent)  
(ec) 5-6/3, (t)+(m) 9-10/10, (bw)

\* Fax to attention of Social worker, Ashley Dicitio

~~Yvonne Moore~~

Deirdre Moore, CFA, BBA

c/o OCDC, Seq #1

2244 Innes Road

Gloucester, ON K1B 4C4

fax 613 590-5503

phone 613-824-6090

e-mail ashley.dicitio

@ontario.ca

C 3/5



# Photograph of the bank drafts that Moore had on hand to pay rent

Moore *knew* that 2019 would be brutal: Kiska would finally be brought to trial ... which he would avoid at **ANY** cost. So, she prepared the best she could by storing money (in ways that would be difficult to steal) and evidence\* (in ways that would be difficult to steal) in an attempt to survive *whatever* from *wherever* she might end up.

She ended up in California: Kiska still managed to rob her anyways ... or at least that's what he claimed. (Someone has, that's for certain.)



C4/5

## Lack of protection from Ottawa Police Services

Link to folder that contains proof of this allegation, including audio, is here:

<https://www.dropbox.com/sh/p7hpiqhtr1ctsx/AACgVSshB54iR9hJWZC6X35Ea?dl=0>

OR visit:

*pfi.ROCKS/ops1*

At least four officers, including Detective Daniel Gervais, have access to the evidence in this folder, as does the Office of the Independent Police Review Directorate who just rejected my complaint against the OPS opened September 5, 2019.

## "Services" from the Law Society of Ontario

Complaint against paralegal, Diego Fernandez-Stoll is here:

<https://www.dropbox.com/s/ddmt1ig64zzwtxd/01ec%2020191008%20LSO%20Complaint%20against%20paralegal%20Fernandez-Stolls.pdf?dl=0>

E-mail thread re: investigation "process" is here:

<https://www.dropbox.com/sh/bgmqiz0qe1tqiU5/AAAGNj3rdH2DbNGCimQDQcKla?dl=0>

*C 5/5*



## **Schedule D**

### **Samples of Evidence**

**found in**

## **Interview with OPS Detective Gervais**

The father colluded with the Quebec-based psychiatrist, Dr. Paule Kemgni, who ignored the mother for 21 days, ensured that she missed the CYFSA April 8, 2019 hearing and produced an 20190408 NCR finding based entirely on the hearsay of the father, Jonathan Kiska, and his now-diseased companion sister.

## 09. STATEMENT SUMMARY

Case No: 394983

Police Service: OTTAWA POLICE SERVICE  
Occurrence Number: 19-186131 ← opened with Joanne Borthwith July 27!  
Author: CST JENNIFER P. SIMPSON 2240  
Date/Time: 26 07 2019 13:17 ← July 26! Before my arrest?  
Type: SS - STATEMENT SUMMARY  
Subject: KISKA, JONATHAN W

## \*\*\* VICTIM INTERVIEW\*\*\*

DATE - 26 JUL 2019 at 1:25 p.m.  
LOCATION - 474 Elgin ST, 221A

INTERVIEWER - Det. Gervais (DG)  
VICTIM - Jonathan KISKA (JK)  
ACCUSED - Deirdre MOORE (DM)

## \*\*\* SUMMARY ONLY - NOT VERBATIM \*\*\*

1325hrs - both in

- 1 DG - introduction, audio/video, please ask if I say something you don't  
2 understand or is wrong, tell the truth, questions?  
3 JK - how long going to take? need to be back at my sister's close to 1430hrs
- 4 DG - what's been going on between you and ex  
5 JK - she's changed her name a few times in past month
- 6 DG - been other incidents since June incident, what's happened since June  
7 27th?  
8 JK - believe it was a Wednesday she was arrested, she was released on the  
9 Thursday morning, on the Friday she was communicating through email and text  
10 and LinkedIn post, she was spending weekend in Toronto, she got thrown off  
11 the train to Toronto in Kingston, she travelled throughout USA for next 2  
12 weeks, kids were ok during then as told kids she was in USA, she had been  
13 there in April/May/June, their stress and anxiety reduced when she's away,  
14 now about a week or 2 ago she arrives back to Ottawa, on top of all this in  
15 the restraining order there's limits of her being with in radius of house  
16 and school, there was a scheduled visit at CAS, she was early, she created a  
17 disturbance, police called, I arrived with kids at scheduled time, spoke to  
18 CAS supervisor, was told she was recording, I told them concerned she's  
19 video kids, supervisor told her no phone, she got mad, there was no visit,  
20 CAS has told her she's done and not getting another opportunity to see kids  
21 as she didn't follow the rules, now only opportunity is to break the order,

OTT67

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1 I get emails everyday now, up to 48 hours ago she was posting on LinkedIn,  
2 that's down now, some videos down off Youtube now, despite the illness she  
3 loves her kids, in her mind she's protecting the kids from me, on that  
4 Friday night she breaches the order, breached on Saturday night, on Sunday I  
5 get an email from a neighbour 1 street over saying she was there and left  
6 packages, that was last weekend, now again this morning, friend in house  
7 gave a statement to police, incredible anxiety with kids, they love their  
8 mom, they're 13 and 11, they know it's not really Mom, developing  
9 understanding, but enough is enough, this isn't normal

10 DG - not sure at moment if criminal charges or not, explains DV mandate, if  
11 deemed not DV then some discretion, statement voluntary, continue?  
12 JK - yes

13 DG - so she stopped having contact around Feb, order granted in April  
14 JK - March I think, when they took the kids she kept coming to the house,  
15 there was no order then, order part of temporary sole custody

16 DG - up to June, there was a reprieve?  
17 JK - she wasn't here, early March she leaves Ottawa, she goes to Quebec City  
18 at first, then Valleyfield, that's where she was arrested, not clear if RCMP  
19 or Quebec police, 4am she's driving, they want her to stop, she doesn't stop  
20 , she goes to Valleyfield court and right away sent for psych evaluation,  
21 she gets out and she's in Laval prison for 4 or 5 weeks up to her trial,  
22 March into April, 2 months she's not here and not able to communicate with  
23 me or anyone, trial happens and found not guilty, she gets out and travels  
24 to USA, she flies to UK, she flies to Moscow for a day and a half, she flew  
25 back to west coast, drives across country, back into Canada early June, that  
26 visist with CAS that didn't happen and then travelling to USA

27 DG - you maintain communication generally? 100% FALSE  
28 JK - don't communicate back with her anymore, I get the 6 or 8 emails or  
29 texts, I have a lawyer to deal with family court matters, no point in trying  
30 to communicate with her

31 DG - what happens the Friday she breaches?  
32 JK - it's a Friday/Saturday, <looks at his phone>, the Saturday  
33 Cst. Cunningham shows up, banging on the door screaming, me and Sean at home,  
34 he realizes she's there and comes to me, we go into my bedroom and call 911,  
35 by time police come she's gone, when taxi leaves the first time it comes  
36 back a few minutes later, was the taxi driver delivering a few packages for  
37 the kids

38 DG - she shows up when?  
39 JK - on the Saturday about a quarter to 10 or so, it's late, PM 100% FALSE

40 DG - how do you come to realize she's there?  
41 JK - my son realizes, dog starts barking, Sean looks and it's Mom at the  
42 door

ENTIRELY FALSE  
NEVER HAPPENED

1 DG - what was she doing?  
2 JK - I didn't have a visual, he came to me in my bedroom, we didn't engage  
3 and stayed there, she was screaming and yelling, can't recall what it was,  
4 probably something nasty about me

5 DG - what drove you to stay in bedroom?

6 JK - safety plan with CAS, doors locked, don't engage, trying to keep son  
7 away from seeing her, trying to be safe

8 DG - how long was she there?

9 JK - probably less time than the first night, 4 to 5 minutes

10 DG - what happens Friday?

11 JK - it's earlier, I get email messages maybe 5, then 6, she asks for  
12 pictures of the house as she has it for sale on Kijiji, we both own it so  
13 she can't do that, then 8 or 8:30 a yellow cab shows up, my son sitting in  
14 the kitchen playing computer games, she's in backyard taking pictures of the  
15 house, same thing, we go into bedroom and call 911, screaming and yelling,  
16 banging on door, door bell, maybe 7 minutes, cab leaves, cab comes back and  
17 leaves bags, Saturday morning I google taxi info as Ottawa doesn't have  
18 yellow cabs, was advertising from Niagra on side

Moore had every right  
to list the house for  
sale: the divorce trial  
was scheduled for September.

19 DG - how long?

20 JK - about 7 minutes

21 DG - Sunday?

22 JK - email from neighbour, that she dropped 2 packages off, walked with dog  
23 and went and got them, been on high alert everyday this week

24 DG - house # she dropped? Paul & Dana Hunsberger, one street over

25 JK - have to check

26 DG - between then and today? any communication?

27 JK - texts, emails, she called last night, I was sleeping, that's where she  
28 started talking about firing squads and death penalty, same to my sister  
29 last night, <reads paper>, she wants death penalty and us to be shot by  
30 firing squad, similar message to me and to family friends, willing to talk  
31 to police

Domestic terrorism can result in the death  
penalty in parts of the U.S. His harassment

32 DG - time cal to you?

33 JK - I answered it, 6:09 last night, no other calls last night, 6 or 7 followed  
34 emails

the mother throughout the U.S. as she  
was a Targeted Individual.

35 DG - emails on phone

36 JK - yes



\* Dave Stewart  
ex- CSIS

1 DG - today?

2 JK - yesterday the kids biked to summer school on Fisher AVE, I knew she was  
3 going to court today, wanted them to bike to school but felt too risky as  
4 good chance she'd come to house after court, I went to work, got a text from  
5 a friend at 10:10 saying to call 911 as she was there, I called, also called  
6 a neighbour a few doors down, he went, he spoke to her, he went back to the  
7 house, Felt I should go home, went home, police still not there, I drove to  
8 kids school and waited for them to get out at 11:30, we went and ate

9 DG - how does this behaviour make you feel

10 JK - hostages in our own home, kids don't want to go outside, kids don't  
11 want to walk dog, they are anxious, they are worried, Kate said she'd like  
12 mom to stay in Texas, daughter understood mom's illness earlier on, son  
13 taking longer to accept what's gone on in family, he's shifted with recent  
14 events to understand Mom's not well and likely not go back to live with her

\* not likely or, if so, only due  
to Kiskatz's gaslighting of her. TM

15 DG - kids worries, what about you?

16 JK - I'm constantly engaged with police, CAS, lawyer, safety planning, my  
17 life is twisted, it's a circus, even though I don't respond to the  
18 communication it's hard, been at it for 6 years, starts to get to you, I'm  
19 working, I keep it as normal as I can, it takes it's toll

20 DG - what is the concern if you or kids engage with DM?

21 JK - she's kidnapped them twice, 2015, Jan 2019, daughter held hostage in  
22 bathroom for a day and a half, police/CAS couldn't convince her, her parents  
23 couldn't convince her, she was convinced I was trying to take kids, I was  
24 just taking Sean to his first spinning class, there's been reference she  
25 wanted to take kids to USA, risk she'll take the kids, don't know what would  
26 happen, more and more I'm concerned for my own physical safety, in coming  
27 weeks CAS putting documentation we're seeking full and permanent custody on  
28 my behalf, where does it end? FALSE

misdiagnosed and/or false TM

29 DG - her mental health issues?

30 JK - yes, she's been diagnosed with bipolar, paranoia, dillusions,  
31 schizoaffective disorder, took her to hospital before and she said she was  
32 seeing licence plate anagrams, she's been talking to my mom who's been  
33 passed for years, said she was hearing voices, I think she doesn't believe  
34 she's ill

35 1405hrs - DG out

36 1409hrs - DG in

37 DG - we'll quickly go through video to identify things, this (image 1)?

38 JK - her LinkedIn account, want to send to illustrate disobeying order

39 DG - when post?

40 JK - within last 3 weeks

41 DG - you had access to her LinkedIn

The entire CAS involvement  
was orchestrated to  
circumvent the 11 volumes  
of evidence in the

divorce file TM

OTT67

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- 1 JK - yes
- 2 DG - this (image 2)?
- 3 JK - recent form her LinkedIn account, been emailing it to people too, some
- 4 rally in Ottawa and Toronto, sickens me to see images of Sean and Kate with
- 5 that kind of message, don't know how long will be on-line
- 6 DG - image #3
- 7 JK - after she got out prison, she may have been back for a day or so, she's
- 8 saying me and friends passing a book around that had instructions of how to
- 9 organize a terrorist attack, I think is an email, actually probably a text
- 10 *entirely false: I went directly to the U.S.*
- 11 *after retrieving items from Q.P.P.*
- 12 DG - image #4
- 13 JK - Andy, her new name, this was back in December, 3 or 4 days lucid
- 14 thinking I thought she wanted help
- 15 DG - image #5 with 61% battery
- 16 JK - been out for 3 or 4 weeks with images Sean and Kate that I'm paying CAS
- 17 to have the kids with me
- 18 DG - image #6
- 19 JK - May June end April that she's going to take kids to USA, wants
- 20 passports, text
- 21 DG - image 7
- 22 JK - this was text that Kate was sending me back in June when Mom was at Kiska
- 23 door, June 27th
- 24 *has multiple Apple devices*
- 25 *and duplicates children's*
- 26 *Apple IDs.*
- 27 DG - image 8
- 28 JK - June 25th, text, getting passports
- 29 DG - her legal name?
- 30 JK - Deirdre Moore
- 31 DG - summaries of articles?
- 32 JK - were posted on LinkedIn, she PDF'd them and emailed them to various
- 33 people, the mayor and city counsellors
- 34 DG - emails she's sent
- 35 JK - yes
- 36 DG - other images them
- 37 JK - yes
- 38 DG - this?



1 JK - psychiatrist in Montreal, emailed to me

2 DG - this?

3 JK - that was me when I was talking to police, day she was arrested,  
4 Mohammad the CAS worker also

5 DG - that's all

6 JK - there's hundreds of email I have like that of that nature

7 DG - questions?

8 JK - no

9 1422hrs - both out

Dr. Pauline Kemnig?  
why is she emailing  
my ex-husband?

What did

she

email?

ym

Generated Date: 27 Jul 2019 06:43:35

## **Schedule E**

2018

### **Amended Answer of the Mother**

The mother won a huge motion in 2017 and was permitted to amend her Answer to seek damages from the father for a number of his torts and crimes in a family court setting. Justice Darlene K. Summers' decision is available on CanLii.org under Kiska v. Moore



**Superior Court of Justice, Family Court**

(Name of Court)

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

(Court office address)

**Form 10: Answer****Applicant(s)**

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

**Jonathan Kiska****1244 Lampman Crescent, Ottawa, Ontario K2C 1P8****mobile: 613-723-0010 jonathankiska@gmail.com**

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

**Wade Smith****700-116 Lisgar Street, Ottawa, Ontario K2P 0C2****phone: 613-237-3444 wsmith@bellbaker.com****Respondent(s)**

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

**Deirdre Moore****7 Vanson Avenue, Ottawa, Ontario K2E 6A9****mobile: 613-261-3520 deidre\_cfa@icloud.com**

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

n/a

**INSTRUCTIONS: Financial Statement**

COMPLETE A FINANCIAL STATEMENT (Form 13) IF:

- you are making or responding to a claim for spousal support; or
  - you are responding to a claim for child support; or
  - you are making a claim for child support in an amount different from the table amount specified under the Child Support Guidelines.
- You must complete all parts of the form **UNLESS** you are **ONLY** responding to a claim for child support in the table amount specified under the Child Support Guidelines **AND** you agree with the claim. In that case, only complete Parts 1, 2 and 3.

COMPLETE A FINANCIAL STATEMENT (Form 13.1) IF:

- you are making or responding to a claim for property or exclusive possession of the matrimonial home and its contents; or
- you are making or responding to a claim for property or exclusive possession of the matrimonial home and its contents together with other claims for relief.

**TO THE APPLICANTS: Jonathan William Kiska**

If you are making a claim against someone who is not an applicant, insert the person's name and address here.

**AND TO:** (full legal name)**an added respondent,****of** (address of added party)My name is (full legal name) **Deirdre Ann Moore**

1. I agree with the following claim(s) made by the applicant: (Refer to the numbers alongside the boxes on page 4 of the application form.)  
20-equalization of net family property
2. I do not agree with the following claim(s) made by the applicant: (Again, refer to the numbers alongside the boxes on page 4 of the application form.)  
11 – support for the children, 13- custody of the children, 14 – access of the children, 21- exclusive possession of matrimonial home, 30- costs, 32- prejudgement interest, 50 – other.
3. ☒ I am asking that the applicant's claim (except for the parts with which I agree) be dismissed with costs.
4. ☒ I am making a claim of my own. (Attach a "Claim by Respondent" page. Otherwise do not attach it.)
5. ☒ The FAMILY HISTORY, as set out in the application,  
☐ is correct ☒ is not correct

(If it is not correct, attach your own FAMILY HISTORY page and underline those parts that are different from the applicant's version.)

6. The important facts that form the legal basis for my position in paragraph 2 are as follows: (In numbered paragraphs, set out the facts for your position.)

Set out below.

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Put a line through any blank space left on this page

January 27, 2018  
Date of signature

T. J. McCall  
Respondent's signature

E<sup>2</sup>/14



**CLAIM BY RESPONDENT**

Fill out a separate claim page for each person against whom you are making your claim(s).

**7. THIS CLAIM IS MADE AGAINST**☒

THE APPLICANT

☐

AN ADDED PARTY, whose name is (full legal name)

(If your claim is against an added party, make sure that the person's name appears on page 1 of this form.)

**8. I ASK THE COURT FOR THE FOLLOWING:**

(Claims below include claims for temporary orders.)

Claims under the Divorce Act (Check boxes in this column only if you are asking for a divorce and your case is in the Superior Court of Justice or Family Court of the Superior Court of Justice.)	Claims relating to property (Check boxes in this column only if your case is in the Superior Court of Justice or Family Court of the Superior Court of Justice.)	Claims relating to child protection
00 <input checked="" type="checkbox"/> a divorce	20 <input checked="" type="checkbox"/> equalization of net family Properties	40 <input type="checkbox"/> access
01 <input checked="" type="checkbox"/> support for me	21 <input type="checkbox"/> exclusive possession of matrimonial home	41 <input type="checkbox"/> lesser protection order
02 <input checked="" type="checkbox"/> support for child(ren) - table amount	22 <input type="checkbox"/> exclusive possession of contents of matrimonial home	42 <input type="checkbox"/> return of child(ren) to my care
03 <input type="checkbox"/> support for child(ren) - other than table amount	23 <input type="checkbox"/> freezing assets	43 <input type="checkbox"/> place child(ren) into care of (name)
04 <input checked="" type="checkbox"/> custody of child(ren)	24 <input checked="" type="checkbox"/> sale of family property	44 <input type="checkbox"/> children's aid society wardship for _____ months
05 <input checked="" type="checkbox"/> access to child(ren)		45 <input type="checkbox"/> society supervision of my child(ren)
Claims under the Family Law Act or Children's Law Reform Act	Other claims	
10 <input checked="" type="checkbox"/> support for me	30 <input checked="" type="checkbox"/> Costs	
11 <input checked="" type="checkbox"/> support for child(ren) - table amount	31 <input type="checkbox"/> annulment of marriage	
12 <input type="checkbox"/> support for child(ren) - other than table amount	32 <input checked="" type="checkbox"/> prejudgment interest	
13 <input checked="" type="checkbox"/> custody of child(ren)	33 <input type="checkbox"/> claims relating to a family arbitration	
14 <input checked="" type="checkbox"/> access to child(ren)		
15 <input checked="" type="checkbox"/> <u>restraining/non-harassment Order</u>		
16 <input type="checkbox"/> indexing spousal support		
17 <input type="checkbox"/> declaration of parentage		
18 <input type="checkbox"/> guardianship over child's property		
50 <input checked="" type="checkbox"/> other (Specify)		

An assessment under Section 30 of the Children's Law Reform Act, if necessary, and other claims including those detailed below:

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Give details of the order that you want the court to make. (Include any amounts of support (if known) and the names of the children for whom support, custody or access is claimed.)

1. An order for the awarding of compensation for general, aggravated and punitive damages due to the intentional infliction of mental suffering and emotional distress.
2. An order for the awarding of compensation due to attempted parental alienation.
3. An order for the awarding of compensation due to the tort of defamation.
4. An order for the awarding of compensation due to the tort of breach of fiduciary responsibility.
5. An order for the awarding of compensation for general, aggravated and punitive damages due to the negligent infliction of mental suffering and emotional distress.
6. An order for pecuniary damages related to the criminal act of Defamatory Libel.
7. An order for pecuniary damages related to the criminal act of Criminal Harassment.
8. An order for pecuniary damages related to the criminal act of Mischief.
9. An order for retroactive spousal and child support under the Divorce Act.
10. An order for constructive trusts and/or vesting orders for cost recovery and/or damages awards.
11. An order that the Applicant not come within 500 metres of the Respondent's home or harass Respondent by way of phone, text, e-mail or any other form of communication.
12. An order for a divorce;
13. An interim and permanent order for joint custody of the children of the marriage, namely, Sean Kiska (born May 8, 2006) and Cate Kiska (born November 30, 2007); TO BE CHANGED
14. An interim and permanent order that the children reside with both parents in an equal timesharing arrangement on a 2/2/3 schedule or other schedule that the Court deems appropriate; TO BE CHANGED
15. In the alternative, an order that the parties jointly retain the services of professional to prepare a custody and access assessment report that provides recommendations to the Court as to an appropriate parenting schedule; TO BE REMOVED
16. An interim and permanent order for equal division of holiday time between the parties including Christmas, March Break, Easter holiday, Thanksgiving, etc.; TO BE REMOVED
17. An interim and permanent order that either party is prevented from removing the children permanently from the jurisdiction of the City of Ottawa without the written consent of the other parent or a Court Order; TO BE REMOVED
18. An interim and permanent order for child support payable pursuant to the Federal Child Support Guidelines having regard to the parenting arrangements in place;
19. An interim and permanent order that the children's special and extraordinary expenses be paid by the Applicant both parties in proportion to their respective incomes as set out in section 7 of the Federal Child Support Guidelines;

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20. An interim and permanent order that the Applicant pay spousal support to the Respondent in an amount to be determined;
21. An interim and permanent order requiring the Applicant to maintain a purchase a paid-up policy of life insurance in an amount sufficient to secure his child and spousal support obligations and that he designate the Respondent as irrevocable beneficiary thereof in trust for the children;
22. An order for equalization of the parties' net family properties. *TO BE REMOVED*
23. An order for the partition and sale of the jointly held matrimonial home located at 1244 Lampman Cr., Ottawa, Ontario, K2C 1P8;
24. An order for costs of this matter on a substantial indemnity basis. *FULL*
25. An order for pre-judgement interest in accordance with the Courts of Justice Act.
26. An order that this order be police enforceable.
27. Such further and other orders as this Honourable Court deems just.

### IMPORTANT FACTS SUPPORTING MY CLAIM(S)

(In numbered paragraphs, set out the facts that form the legal basis for your other claim(s).)

1. The parties began cohabiting in 1997 and were married on July 22, 2000 and separated on September 23, 2015. They have two (2) children of the marriage namely, Sean (age 9) and Cate (age 8).
2. Both parties have a background in finance. The Applicant ("Husband") holds a Bachelor of Commerce and a Chartered Professional Accountant Designation. The Husband also holds a Master's in Business Administration. The Respondent ("Wife") holds a Bachelors in Business Administration and has achieved her Chartered Financial Analyst designation.
3. Shortly after the parties were married, the Wife left her full time position with National Bank Financial to become an independent management consultant. She set up a consulting business, AdvisorOnTrack ("AOT"), which she operated as a sole proprietorship until January 2004, when she then incorporated this company.
4. Around this same time period, the Husband lost his position with InTouch Survey Systems and also decided to become an independent consultant. The parties began invoicing clients under AOT and have primarily earned dividend income from AOT since that time. The parties each own 50% of the shares of AOT and are both officers of the company.
5. Following the birth of their children, the parties agreed that the Wife would work from home-so that she could also focus her attention on childcare responsibilities. However, given the nature of their work as independent contractors and the fact that the Wife had been working as a consultant with AOT for a longer period by the time that the children were born, she had to take on more consulting work than was initially anticipated resulting in the Husband also taking some time off to be at home with the children in the first few months of their son's birth in 2006.
6. By 2007, the Husband had built up his reputation and client base and has since that time being the primary contractor for AOT allowing the Wife to focus her attention on the care of the children. The Wife is highly

*E 5/14*

attuned to each child's routine and needs and has always ensured that her children are her top priority. For example, the Wife:

- a. Breastfed both children: Cate until she was 12 months old and Sean until he was 4 months old (as he had difficulty nursing). Once the children were no longer breastfeeding, the Wife would prepare healthy meals for the children by making her own baby food;
- b. Managed the children's healthcare needs including:
  - i. Scheduling medical and dental appointments on her days off from work and taking the children to all appointments;
  - ii. Administering the children's medications;
- c. Managed the children's education and childcare needs including:
  - i. Researching appropriate pre-school arrangements for the children;
  - ii. Registering them in nursery school and pre-kindergarten programs;
  - iii. Developing home schooling materials for phonics and music;
  - iv. Assisting and supervising the completion of homework. The Husband took on a larger role assisting with homework completion however the Wife plays a larger role in piano instruction as well as supporting French homework as the bilingual parent;
- d. Taking the children to and from school every day as well as to their various activities (piano, organized sports, etc.). The Mother and children also enjoy frequent visits to the library;
- e. Researched and registered the children in various activities including playgroups;
- f. Purchased clothes, toys, crafts, books, and other education items for the children including supplies required for school;
- g. Planned and organized the children's birthday parties;
- h. Planned and organized activities for holidays such as Canada Day (picnics, t-shirt making, etc.);
- i. Purchased gifts for the children to bring to friend's birthday parties
- j. Ensured the children had family dinners on the weekends, and would organize dinners at the home so that both sets of their extended families would attend;
- k. Was responsible for purchasing all the gifts for the children including Christmas presents, Easter presents and birthdays;
- l. Shared the responsibilities surrounding the children's grooming including bathing the children, washing/combing through their hair and cutting their nails;
- m. Sharing responsibility for putting the children to bed and ensuring that they followed their bedtime routine including brushing their teeth, reading bedtime stories, and snuggle time before going to sleep;
- n. Prior to hiring a part-time housekeeper in *[when]*, assuming the majority of the household management tasks including:

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- i. Preparing the family meals;
  - ii. Shopping for family groceries;
  - iii. Preparing the children's lunches and snacks;
  - iv. Washing and organizing the children's clothing;
  - v. Keeping the home tidy, clean, and organized.
- o. Taking turns in washing the dishes and cleaning up the kitchen after meals.
7. Even after the children began attending school full time, the Wife continued to work part-time so that she could maintain an active role in the children's care including:
- a. Driving them to and from school each day;
  - b. Driving them to playdates and birthday parties;
  - c. Organizing playdates at home;
  - d. Attending all medical and dental appointments related to the children;
  - e. Taking the children to piano lessons and assisting them with their practice at home;
  - f. Attending school concerts, events, and activities;
  - g. Organizing special events and adding special touches such as preparing themed cakes, cookies, clothing, and homemade invitations;
  - h. Encouraging the children to lead an active lifestyle by taking them on walks and bike rides and registering them in sports programs suited to their interests and abilities;
  - i. Encouraging the children to explore the arts through participation in crafting and music;
  - j. Encouraging the children to make healthy food choices by discussing nutrition.
8. The Husband was generally away from the home each weekday from 8:00 a.m. to 5:00 p.m. The parties would share in the evening routine with the children when the Husband returned home from work such as homework assistance, bath and bedtime routine, as well as taking children to extracurricular activities on weekends.

#### **The Wife's Medical Condition:**

9. In 2013, the Wife began experiencing mental health issues. These changes began around the same time in each that the Wife began experiencing symptoms of menopause.
10. The mental health issues experienced by the Wife since 2015, have led to approximately 3 instances where the Wife required extended hospitalization following episodes where she was experiencing delusions and paranoid thoughts.
11. The Wife's most hospitalization, as described in further detail below, has confirmed that the Wife suffers from psychosis non-otherwise specified (NOS) with a leaning toward schizoaffective disorder.
12. In the Husband's material, he describes the circumstances surrounding each hospitalization in great detail and tries to depict the Wife as being unstable and uncooperative when it comes to her medical treatment. The Wife does not deny that she had delusional episodes which resulted in her being hospitalized. However, the Wife's position is that the Husband's materials do not accurately reflect the facts/issues surrounding the symptoms which led to periods of hospitalization in 2013, 2014 and the most recent one in October 2015.
13. It is these inaccurate statements that continue to be made by the Husband that the Wife feels were misinterpreted by her previous physicians who relied heavily on the Husband's account of the Wife's

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behaviour. The Wife believes that these inaccurate statements led to her initial improper diagnosis of Bipolar Disorder in 2013 and 2014.

14. The Wife acknowledges that she was not compliant with taking her prescribed medication following her release from hospital in 2013 and 2014. The reason for this was that she adamantly opposed the diagnosis of Bipolar disorder at the time. This was well documented in her medical file yet the nurses and doctors would not discuss the Wife's concerns with her. Instead, they insisted that the Wife take medication that was not doing anything to treat her delusions and was in fact making her feel worse.
15. It was for this reason that the Wife contemplated moving to Gatineau in 2014. She hoped that by establishing a residence in Quebec that she could seek a second opinion of her medical situation. The Wife put a down payment on first and last months' rent on a condominium in Gatineau in the fall of 2014 and took other steps to establish residency in Quebec. This also coincided with the Wife advising the Husband that she wanted a divorce in the summer of 2014.
16. In September 2014, the Husband pleaded with the Wife not to end their marriage. The Wife gave up her condominium in Gatineau and the parties focused on reconciling their relationship.
17. The Applicant was symptom free for approximately one (1) year. Then, on September 23, 2015, she came across some hospital notes in her medical file that summarized a telephone call placed by the Husband on July 10, 2014, describing her behaviour. The Wife was upset and shocked to see that the Husband had misrepresented various incidents. She confronted the Husband about these statements and explained that some of the incorrect statements which suggested she was experiencing manic and depressive periods were likely what led to her spending the entire summer of 2014 in hospital.
18. The Wife felt extremely betrayed and advised the Husband that their relationship was over. She asked the Husband to assist in correcting his inaccurate statements in her medical file as she explained that it was her belief that this contributed to her improper diagnosis. The Husband initially advised her that he would contact the hospital to correct his statements but then did not do so.
19. In the days that followed, the Wife began to experience delusional thoughts as the stress in the household continued to build and she became fearful of the Husband. By October 9, 2015, her delusional thoughts had increased and she was so fearful that she decided to take the children to the Hilton Hotel at the Lac Leamy Casino in Gatineau for 2 days as this was a place that she felt that she and the children could be safe given the high level of security onsite.
20. While the Wife was at the Hilton Hotel with the children, the Husband called her cell phone on numerous occasions and left threatening messages which only heightened her delusions. At one point, the Husband phoned the police and had officers come to the hotel room to check in on the children. The police left once they determined that the children were fine.
21. The following day, the Husband contacted the Wife again and was in a calmer state resulting in the Wife agreeing to return home with the children. As soon as she arrived at the home, the Husband became very hostile causing the Wife to fear that he was going to take the children from her which is why she blocked the Husband's vehicle from being able to exit their driveway. At that point, the Husband phoned the police who attended at the home to de-escalate the conflict. A referral was made to the Children's Aid Society.
22. That same evening, the Wife got into her vehicle and drove herself to the Civic Campus of the Ottawa Hospital. She remained in hospital from October 11, 2015 to November 12, 2015.
23. The Wife's Discharge Summary Report confirms that her current working diagnosis is Psychosis NOS

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(not otherwise specified) with a leaning toward schizoaffective disorder. Upon her release, the Wife was referred to the Psychiatry Outpatient Program for treatment. Her treating psychiatrist is now Dr. Mercer, whom the Wife has seen on three (3) occasions since December 2015. The Wife is to continue seeing Dr. Mercer every 4 to 6 weeks.

24. In addition, the Wife has been prescribed medication which she continues to take daily. The Wife's physicians recognize that her delusional episodes are triggered by heightened states of anxiety. The Wife recalls that before each instance where she was hospitalized, she and the Husband had been engaged in significant high stress periods, specifically:
- In 2013, the parties had a severe argument whereby the Husband was yelling/screaming at the Wife and implied that he would divorce her;
  - In 2014, the parties had a series of arguments about several different topics including the household budget which resulted in the Husband accusing her of being manic;
  - In 2015, the parties argued about notes that the Wife came across in her medical file that summarized a conversation between the Husband that provided inaccurate statements which she believes contributed to her mis-diagnosis.
25. Now that the Wife's physicians have been able to more accurately pinpoint the Wife's condition and triggers that led to her delusions, they have prescribed Latuda (anti-psychotic) which the Wife continues to take daily. They have also prescribed Clonazepam (anti-anxiety) and Immovane (sleeping aid) to be taken when required.
26. As part of her treatment plan, the Wife's psychiatrist has also recommended that the Wife get back to exercising including attending yoga classes 3 times per week to assist her with managing her stress levels.
27. The Wife has also obtained a referral to a social worker so that she can have access to regular counselling in between her appointments with Dr. Mercer.

#### Custody and Access:

28. In spite of the Wife's updated diagnosis and her full cooperation in her treatment program, the Husband has continued to attempt to limit the Wife's interactions with the children.
29. The Husband initially took the position that the Wife was to have only supervised contact with the children. He refused to allow the Wife to spend any time alone with the children and refused to allow her to resume her regular parenting responsibilities such as transporting the children to/from school, taking them to activities, etc. The Husband claimed that this was necessary to protect the children from their mother and that he was acting on the advice of the Children's Aid Society ("CAS") when in fact the CAS attended at the home following the Wife's release from hospital in November 2015 and confirmed that there was no need for supervision.
30. In December 2015, the Husband finally agreed to allow the Wife to resume her parenting duties. However, his behaviour toward the Wife in the home has become increasingly inappropriate and hostile. This includes:
- Making inappropriate comments to the Wife in front of the children such that she is forced to leave the room to ensure that the children are not exposed to any further conflict;

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- b. Constantly interrupting when the Wife spends time with the children and attempting to redirect the children's attention to himself;
  - c. Making comments to the children about their mother in an attempt to portray her as strange or someone that they should be afraid of;
  - d. Threatening to tape record conversations between himself and the Wife and threatening to telephone the police whenever she attempts to converse with him about issues pertaining to their separation including suggesting they participate in mediation.
31. The Wife has done her best to maintain a level of normalcy in the home for the children however this is becoming increasingly difficult. The children are young but they are perceptive. The Wife believes that the children would benefit from counselling to assist them in processing any concerns/emotions they may be feeling surrounding their parents separation. Counselling would also assist in helping the children to understand the issues that the Wife experienced with her mental health from a neutral third party.
32. The Wife has tried her best to work cooperatively with the Husband within the home for the sake of the children. However, it appears to the Wife that the Husband's focus has been on tainting the children's perception of their mother and making them feel that she is someone that they should be fearful of which is inappropriate and confusing to the children. The Wife has also come across an email exchange between the Husband and an individual at the Schizophrenia Society of Ontario wherein the Husband is seeking a referral for counselling for the children. In this email, the Husband indicates that it is very important for him that the children understand that the primary reason for their parents separation is the mother's illness and "nothing to do with their dad". The Wife is very concerned about the inappropriate messages that the Husband is relaying to the children about her.
33. Both parents have been actively involved in the care and upbringing of their children. The Husband himself has suffered from depression issues from time to time during the marriage. In spite of their health issues, both parties have remained committed and involved parents. Anything less than a shared parenting arrangement would be a significant departure from the status quo that the children experienced throughout the marriage.
34. The Wife's position is that it is in the best interests of the children that both parents maintain an equal role in their lives and she is therefore seeking joint custody and a residential schedule that would allow the children to reside with their parents on a 2/2/3 schedule.

**Child Support:**

35. The Wife's position is that child support should be paid in accordance with the Federal Child Support Guidelines in an amount to be determined having regard to the parenting arrangements in place and the income of the parties. Section 7 expenses should be paid in proportion to the parties' incomes.
36. The Wife is requesting that the Husband be required to obtain and maintain a life insurance policy in an amount that is sufficient to cover his child support obligations for the children and that he designate her as the irrevocable beneficiary in trust for the children.

**Spousal Support:**

37. The parties are joint shareholders of a management consultant company, AdvisorOnTrack Inc. Throughout their marriage, they have both drawn equal amounts of dividends from this company which

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was the family's primary source of income.

38. Given the separation, it is unclear what will happen with respect to this business and/or whether the parties will continue to run the business together.
39. It is the Wife's position that she is entitled to spousal support both on a needs and compensatory basis.
40. The parties jointly decided that the Wife would take on a less active role in the business by working part-time so that she could focus her primary responsibility on the care of the children.
41. As a result, the Husband has developed a larger client base and has had an increased opportunity to market himself and his skills in the Ottawa area. The Wife will need an opportunity to transition back to full-time employment and will require spousal support to supplement her income. It is difficult to know at this point what type of income she will be able to earn in relation to the Husband's income.

**Equalization of Net Family Property:**

42. The parties do not hold significant assets with the exception of the jointly held matrimonial home located at 1244 Lampman Cr. and their investments. These assets will have to be valued and equalized.
43. The Wife is prepared to agree to Husband purchasing her interest in the matrimonial home provided he is able to arrange to do so within a relatively short timeframe. Otherwise, the home should be listed for sale as soon as possible so that the parties may access the significant equity in this property to purchase new residences for themselves and the children.
44. In November 2015, the Wife purchased a home located at 12-25 Bayswater Avenue, Ottawa, Ontario. The Wife did so to assist a "friend" who had defaulted on his mortgage. She purchased the home from the owner for an advantageous price. Her friend continues to live in the home and pays all expenses related to this property. When purchasing this home, the Wife used some of the parties' joint funds, specifically \$40,000 from a joint line of credit, to fund part of the down payment on this property. The Wife acknowledges that she is solely responsible for the \$40,000 and that there will have to be an adjustment made to the equalization payment to reflect this.

**Husband's Claim for Exclusive Possession of the Family Home/Police Enforcement:**

45. The Wife has been transparent and forthcoming about her current medical diagnosis and treatment plan. She has provided the Husband with a copy of her discharge summary report that confirms her current diagnosis following her most recent hospitalization. She also provided the Husband with her treating psychiatrist's report and recommendation for treatment.
46. The Husband has made a claim for exclusive possession of the home, which is unnecessary in the circumstances. He has made regular threats to engage in emergency court proceedings to have the Wife removed from the property which is only adding to the conflict and stress in the home.
47. The parties continue to live separate and apart in the matrimonial home. The Wife moved down to the basement and set up a room for herself there on September 23, 2015. In an effort to minimize her interaction with the Husband and any potential conflict, the Wife has recently begun sleeping at a friend's home in the evenings after the children go to bed. On Mondays, Wednesdays, and Fridays she makes sure to return to the home every morning by 6:30 a.m. so that she is present when the children wake up and available to engage in their care. On Tuesdays and Thursdays the Wife attends yoga classes as part of her therapy, however, she is home by 8:00 a.m. to take the children to school.

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48. The Wife has attempted to fairly divide weekend time with the children by spending Saturday afternoon and Sunday morning with the children while the Husband spends Saturday morning and Sunday afternoon with them; however, the Husband often interferes with the Wife's parenting time.
49. The parties are joint tenants of the matrimonial home and are both entitled to occupy this property. The Wife acknowledges that she suffers from mental health issues and she is receiving treatment for same. Her struggles with mental health over the past 3 years in no way justify her removal from the property.
50. Similarly, the Husband's request for police enforcement of any access arrangements determined by the Court is also unnecessary. The Wife's reasons for taking the children to the Hilton Lac Leamy Hotel in Gatineau are described above. This was an isolated occurrence. The Wife is not a flight risk and in no way poses a risk to the children.
51. The Wife is prepared to consent to an order that provides that neither party can permanently remove the children from the City of Ottawa without the written consent of the other parent or Court Order.

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January 27, 2018  
Date of signature

Deirdre Moore  
Respondent's signature

### LAWYER'S CERTIFICATE

For divorce cases only

My name is: Tania Pompilio

and I am the lawyer for (name) Deirdre Ann Moore

in this divorce case. I certify that I have complied with the requirements of section 9 of the *Divorce Act*.

\_\_\_\_\_  
Date of signature

\_\_\_\_\_  
Signature of Lawyer



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Telephone: 416-326-2220 / 1-800-518-7901 TTY: 416-326-4012 / 1-877-425-0575



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1. I agree with the following claim(s) made by the applicant:

**Under the Divorce Act**

- 00 ☐ a divorce  
01 ☐ support for me  
02 ☐ support for child(ren) – table amount  
03 ☐ support for child(ren) – other than table amount  
04 ☐ custody of child(ren)  
05 ☐ access to child(ren)

**Family Law Act or Children's Law Reform Act**

- 10 ☐ support for me  
11 ☐ support for child(ren) – table amount  
12 ☐ support for child(ren) – other than table amount  
13 ☐ custody of child(ren)  
14 ☐ access to child(ren)  
15 ☐ restraining/non-harassment order  
16 ☐ indexing spousal support  
17 ☐ declaration of parentage  
18 ☐ guardianship over child's property

**Claims relating to property**

- 20 ☒ equalization of net family properties  
21 ☐ exclusive possession of matrimonial home  
22 ☐ exclusive possession of contents of matrimonial home  
23 ☐ freezing assets  
24 ☐ sale of family property

**Other claims**

- 30 ☐ costs  
31 ☐ annulment of marriage  
32 ☐ prejudgment interest  
33 ☐ claims relating to a family arbitration

**Claims relating to child protection**

- 40 ☐ access  
41 ☐ lesser protection order  
42 ☐ return of child(ren) to my care  
43 ☐ place child(ren) into care of (name)  
44 ☐ children's aid society wardship  
45 ☐ society supervision of my child(ren)

50 ☐ other

2. I do NOT agree with the following claims made by the applicant:

**Under the Divorce Act**

- 00 ☐ a divorce  
01 ☐ support for me  
02 ☐ support for child(ren) – table amount  
03 ☐ support for child(ren) – other than table amount  
04 ☐ custody of child(ren)  
05 ☐ access to child(ren)

**Family Law Act or Children's Law Reform Act**

- 10 ☐ support for me  
11 ☒ support for child(ren) – table amount  
12 ☐ support for child(ren) – other than table amount  
13 ☒ custody of child(ren)  
14 ☒ access to child(ren)  
15 ☐ restraining/non-harassment order  
16 ☐ indexing spousal support  
17 ☐ declaration of parentage  
18 ☐ guardianship over child's property

**Claims relating to property**

- 20 ☐ equalization of net family properties  
21 ☒ exclusive possession of matrimonial home  
22 ☐ exclusive possession of contents of matrimonial home  
23 ☐ freezing assets  
24 ☐ sale of family property

**Other claims**

- 30 ☒ costs  
31 ☐ annulment of marriage  
32 ☒ prejudgment interest  
33 ☐ claims relating to a family arbitration

**Claims relating to child protection**

- 40 ☐ access  
41 ☐ lesser protection order  
42 ☐ return of child(ren) to my care  
43 ☐ place child(ren) into care of (name)  
44 ☐ children's aid society wardship  
45 ☐ society supervision of my child(ren)

50 ☒ Other: police enforceability

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**FAMILY HISTORY****APPLICANT:**Name: Jonathan William Kiska Age: 57 Birthdate: (d, m, y) September 29, 1960Resident in (municipality & province) Ottawa, Province of Ontariosince (date) 1963Surname at birth: KiskaSurname just before marriage: KiskaDivorced before? ☒ No ☐ Yes (Place and date of previous divorce)**RESPONDENT/JOINT APPLICANT:**Name: Deirdre Ann Moore Age: 52 Birthdate: (d, m, y) September 28, 1965Resident in (municipality & province) Ottawa, Province of Ontariosince (date) 1965Surname at birth: MooreSurname just before marriage: MooreDivorced before? ☒ No ☐ Yes (Place and date of previous divorce)**RELATIONSHIP DATES:**☒ Married on (date) July 22, 2000☒ Started living together on (date) Early 1997☒ Separated on (date) September 23, 2015☐ Never lived together ☐ Still living together**THE CHILD(REN):** List all children involved in this case, even if no claim is made for these children.

Full legal name	Age	Birthdate	Resident in (municipality & province)	Now Living with (name of person and relationship to child)
Sean Charles Kiska	<u>11</u>	<u>May 8, 2006</u>	<u>Ottawa, Ontario</u>	<u>Both parents</u>
Cate Stella Kiska	<u>10</u>	<u>November 30, 2007</u>	<u>Ottawa, Ontario</u>	<u>Both parents</u>

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