



ONTARIO

SUPERIOR COURT OF JUSTICE

Electronically issued
Délivré par voie électronique : 07-Sep-2021
Toronto

B E T W E E N:

Rocco GALATI

Plaintiff

- and -

Alexandra MOORE, CANUCK LAW, "Ronnie" Doe, Janes and Johns Does

Defendants

STATEMENT OF CLAIM

TO THE DEFENDANTS:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service, in this court office, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside of Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defence, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, A JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF CLAIMS, and \$10,000.00 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the plaintiff's claim and \$400 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date: , 2021, Issued by:

Address of Local Office: 393 University Ave.
10th Floor
Toronto, Ontario
M5G 1E6

TO: CANUCK LAW
Alexandra Moore
Janes and Johns Does
"Ronnie" Doe
1689.1871@gmail.com
editor@canucklaw.ca

Defendants

CLAIM

1. The Plaintiff claims:

General damages as against the Defendants, as follows:

- (a) \$4,000,000.00, for explicit libel and slander (defamation) and by innuendo and irresponsible publication;
- (b) aggravated damages as against the Defendants in the amount of \$1,000,000.00;
- (c) punitive damages as against the Defendants in the amount of \$1,000,000.00;
- (d) an interim and permanent injunction requiring the retraction, removal, and prominent apology for any and all defamatory publication and/or remarks by the Defendants;
- (e) \$1,000,000.00 for harassment as delineated by the Superior Court of Ontario in **Caplan v Atas, 2021 ONSC 670**;
- (f) an interim and permanent injunction prohibiting the Defendants, or anyone directly or indirectly associated with them, from posting or disseminating on the internet.
- (g) prejudgment interest pursuant to s. 128 of the **Courts of Justice Act R.S.O. 1990 c. C43**; and
- (h) costs of this action on a substantial indemnity basis and such further or other relief as this Court deems just.

THE PARTIES

(a) The Plaintiff

2. The Plaintiff, Rocco Galati is a senior lawyer, practicing in Toronto, Ontario, who has been practicing law since he was called to the bar in Ontario in 1989.
3. Rocco Galati is a highly regarded and prominent lawyer. He has been a Member of Canadian Who's Who (since 2011). In 2014 and 2015 he was one of the Top 25 Influential Lawyers by Canadian Lawyer Magazine. In 2015 he was awarded the OBA (Ontario Bar Association) President's Award. He was in fact the first lawyer to receive the award.
4. Between May 2015 to May 2019 he served as an elected benchler for the Law Society of Ontario (LSO). Between May 2019 to February, 2021. he also served as a Hearing Panel Member (Adjudicator) of the Ontario Law Society Tribunal (LST).
5. Rocco Galati has litigated, regularly, at all level Courts, including Tax Court, Federal Court (of Appeal), all levels of Ontario Courts, Other Provincial Superior Courts, as well as the Supreme Court of Canada. He has litigated in several provinces including Ontario, BC, Alberta, Manitoba, and Quebec. He has, as counsel, well over 500 reported cases in the jurisprudence. Some of his major cases include: Baker(SCC), Nadon Reference(SCC), Mainville Reference(SCC), Ahmed(SCC), Toronto Star Newspapers (SCC), Felipa(FCA), Wang(OCA).
6. Rocco Galati has been asked to speak and has spoken, regularly, at various Law and other Conferences, as well as Law Schools, Universities and High Schools, across Canada from 1999 to present.

7. Rocco Galati is the founder and Executive Director of Constitutional Rights Centre Inc. since 2004.
8. Rocco Galati has authored/co-authored books such as: "*Criminal Lawyer's Guide to Immigration and Citizenship Law*" (1996), "*The Power of the Wheel: The Falun Gong Revolution*" (2001). He has also produced three Films, "*Two Letters & Counting...*" 2008-2011, written, directed and performed by multi-Genie Award winning Tony Nardi, on the state of art and culture in Canada, and the treatment of "Aboriginal" and "Other" "Canadians" by the Two Solitudes Tribes of Canada, and on the Funding of "Canadian" Art and "Culture".

(b) The Defendants

9. The Defendant, Alexandra Moore, owns, edits, and disseminates the website "Canuck Law", at <https://canucklaw.ca/>, as well as the "Canuck Law" accounts across social media and other media platforms, such as:

Telegram: <http://t.me/canucklaw1>

Gab: <http://gab.com/canucklaw1>

Twitter: [\(at\)canucklaw1](https://twitter.com/canucklaw1)

Parler: [\(at\)canucklaw1](https://parler.com/canucklaw1)

LBRY: [\(at\)CanuckLaw](https://lbry.com/CanuckLaw)

Bitchute: [Canuck Law](https://bitchute.com/CanuckLaw)

YouTube: [Canuck Law](https://youtube.com/CanuckLaw)

<https://slug.com/>

<https://canund.com/>

10. The Defendant Janes and Johns Doe, as well as "Ronnie" Doe, are the various employees, directors, and any other editors, publishers, or writers, who wrote, published, edited, or posted the defamatory statements at issue in the within Statement of Claim.

11. Notwithstanding that s.5 of the **Libel and Slander Act** (“**the Act**”) does not apply to the Defendants, as they are neither a newspaper, nor a broadcaster, under s.5 of the **Act**, nowhere on the Defendants’ website is there **any address or name of proprietor** to satisfy the terms of section 8 of the **Libel and Slander Act**.

● **Facts**

12. On July 6, 2020, Rocco Galati Law Firm Professional Corporation issued, on behalf of various Plaintiffs, a Statement of Claim concerning COVID-19 measures, in Ontario Superior Court File No.: CV-20-00643451-0000.
13. The Defendants were never Rocco Galati’s clients with respect to the above-mentioned Statement of Claim, nor does Rocco Galati have any relationship whatsoever with the Defendants.
14. In or around October, 2020, the Defendants began a persistent, false, malicious, defamatory campaign against Rocco Galati and the Constitutional Rights Centre. With respect to the COVID-19 court case and their work in general.
15. The untrue, malicious, and defamatory statements made by against the Plaintiff are as follows.
16. On September 16, 2020, the Defendants posted on their website, <https://canucklaw.ca/>, an article entitled “**Bit Of History: Galati/Trudeau Put Rights Of Terrorists Over Canadians**”, this article came to the Plaintiff’s attention in or around the end of November 2020, and was still running as of December 4, 2020, this article stated as follows:

POST: “Bit Of History: Galati/Trudeau Put Rights Of Terrorists Over Canadians”, Dated September 16, 2020, which states:

Rocco Galati and Justin Trudeau both believe it's a human right for foreigners who obtain Canadian citizenship to retain that citizenship, even after being convicted of terrorism or treason offences. Although Galati lost that court challenge, Justin Trudeau would "correct" it anyway, by implementing Bill C-6.

Simply holding a Canadian passport doesn't make you a Canadian, except in a civic sense. Terrorists and traitors, however, don't even deserve that.

1. Islam, Terrorism, Religious Violence

Check this [series](#) for more information on the religion of peace. Tolerance of intolerance is being forced on the unwilling public. Included are efforts to crack down on free speech, under the guise of "religious tolerance".

2. Galati Defending Terrorists' "Rights"

[CLICK HERE](#), for Galati claiming to have received threats.
[CLICK HERE](#), for \$10.5 million payout to Khadr.
[CLICK HERE](#), for Galati defending citizenship for terrorists.

<https://www.canlii.org/en/ca/fca/doc/2001/2001canlii22177/2001canlii22177.html>

<https://www.canlii.org/en/ca/fct/doc/2003/2003fc928/2003fc928.html>
[galati.easier.bail.for.terrorists.2006canlii24454](#)
[galati.terrorist.citizenship.2015fc91](#)

3. Challenging Security Certificates (2001)

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Galati, decided to stop representing terrorists in late 2003. It wasn't because he saw the practice as wrong. Instead, it was due to alleged death threats. One of his clients was Abdurahman Khadr, brother of Omar Khadr.

Omar Khadr himself, would eventually receive \$10.5 million from taxpayers, due to "alleged" abuses and human rights violations at Guantanamo Bay, Cuba.

5. Causing Delays To Justify Release (2003)

Canada (Minister of Citizenship and Immigration) v. Mahjoub, 2003 FC 928 (CanLII), [2004] 1 FCR 493
<https://www.canlii.org/en/ca/fct/doc/2003/2003fc928/2003fc928.html>

In addition to lying in his earlier application, a defense was raised that human rights had been violated, since the deportation order hadn't taken place within 120 days (4 months). However, that falls flat when it's pointed out that the Applicant tried other legal means to stay in Canada.

6. Easier For Terrorists To Obtain Bail (2006)

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R. v. Ghany, 2006 CanLII 24454 (ON SC)
<https://www.canlii.org/en/on/onsc/doc/2006/2006canlii24454/2006canlii24454.pdf>

...

In short, Galati wanted his client (who was charged with Section 83 — terrorism — offences), to have the court view them in the same manner as Section 469 offences. This would make it mandatory that bail hearings be held by the Superior Court of Justice in Ontario. Thus it would remove the discretion for the Lower Court to conduct it. Galati admits that the reason behind it is that he figures it will be easier for his client to get bail.

7. Bill C-24, Deport Dual National Terrorists

...

<https://www.parl.ca/LegisInfo/BillDetails.aspx?Language=E&billId=6401990>

[Here you embed an high light part of this article]

This provision would allow for Canada to strip away the Canadian citizenship of a foreign-born person convicted of terrorism or treason, if citizenship elsewhere was an option.

8. Fighting Deportation Of Terrorists (2015)

Galati v. Canada (Governor General), 2015 FC 91 (CanLII), [2015] 4 FCR 3
[Here you embed and highlight part of the headnote of the case]

Although this application was thrown out, Trudeau would soon be elected, making this all a non-issue. Still, it's absurd beyond belief that foreigners who come to Canada only to engage in these crimes should have people fighting for their rights.

9. Trudeau Liberals Introduce Bill C-6 (2016)

In early 2016, the Trudeau Government introduced Bill C-6, to remove the requirement that foreign born dual nationals be deported if convicted of terrorism or treason. In short, Trudeau did in the legislature what Rocco Galati failed to accomplish in Federal Court.

10. Rights Of Canadians Don't Matter

Lawyers have a well deserved reputation for being scum, and these are just a few examples of it. Societal norms and protections are undermined under the pretense of "rights" for people who enter Canada with the intention of doing harm.

Just as bad are the lobbyists, politicians, NGOs, and others who undermine our laws to let these people in. Islam is not compatible with a Western Society, and we should not make any effort to accommodate it.

Foreign NGOs should not be allowed to influence laws and policies in Canada. For that matter, foreigners shouldn't be allowed to hold public office — because their loyalty will always be divided.

Also, still running, as of December 4, 2020, was your publication dated, October 10, 2020, entitled "Rocco Galati's Real Record As A Constitutional Lawyer", which states as follows:

[You post CBC video News Story, on episode of Power and Politics, interviewing, Rocco Galati, and Chris Alexander]

[you post a Conservative ad: Justin believes terrorists should keep their Canadian citizenship, dated September 28, 2015]

From Canuck Politics. Although a political ad, this one is entirely truthful, and worth a mention.) Ideologically, Justin Trudeau and Rocco Galati seem to be aligned on this issue.

Galati wasn't even born in Canada. *This makes him a foreigner trying to change the laws for the benefit of other foreigners. He'll never be a Canadian, except in a civic sense, and even that is questionable.*

Note: at 3:30, Galati claims this is about stripping rights of CANADIAN born people. But in court, he tries to claim his immigrant status for private interest standing. Nice bait-and-switch.

1. Islam, Terrorism, Religious Violence

Check this series for more information on the religion of peace. **Tolerance of intolerance is being forced on the unwilling public. Included are efforts to crack down on free speech, under the guise of “religious tolerance”. What isn't discussed as much are the enablers, whether they are lawyers, politicians, lobbyists, of members of the media.**

2. *Galati A Professional Agitator/Disruptor?*

[Here you embed a story from the National Post: Lawyer Who Defended Khadr and Challenged Nadon Appointment Did it all to mess with the “government Machine”, dated July 4, 2014]

That was a 2015 article from the National Post, which spells out pretty well the situation with Rocco Galati. **He considers himself an opponent of the government.**

3. Galati Fighting For Terrorists' Rights

Canada (Minister of Citizenship and Immigration) v. Mahjoub, 2001 CanLII 22177 (FCA)

This was an appeal to the Federal Court of Appeals as to whether suspected terrorists can be detained on “security certificates”, and what were the terms.

Canada (Minister of Citizenship and Immigration) v. Mahjoub, 2003 FC 928 (CanLII), [2004] 1 FCR 493 **A very interesting technique: Stall for as long as possible using various tactics, then claim your rights are violated when everything is delayed unreasonably. *Seems designed to weaponize the rules.***

Harkat (Re), 2003 FCT 759 (CanLII), [2003] 4 FC 1020

This challenge was to prevent a suspected terrorist from being removed from Canada. He was found to be ineligible to stay as a refugee.

In December 2003, Galati claimed he would no longer be taking terrorism cases because he was threatened. Spoiler: he still takes them. ***There seemed to be no moral issue with doing this line of work, however.***

In 2004, Galati and Abdurahman Khadr (Omar Khadr's older brother), held a press conference. Galati had secured Khadr's release from Guantanamo Bay, Cuba. Khadr admits that stories he previously told were completely made up.

R. v. Ghany, 2006 CanLII 24454 (ON SC)

In 2006, Galati launched a constitutional challenge to make it mandatory that all (Ontario) terrorism cases be heard in Ontario Superior Court, as opposed to the Lower Court. Galati reasoned that this would make it easier for accused terrorists to be bail.

Horrace v. Canada (Citizenship and Immigration), 2015 FC 114 (CanLII)
Galati represented a Liberian man who tried to claim asylum, and failed twice. He was under investigation for terrorism/subversion back home, and there were serious safety concerns. ***Galati attempted to secure permanent resident status but failed.***

Galati v. Canada (Gov General), 2015 FC 91 (CanLII), [2015] 4 FCR 3
This challenge was against Harper's Bill C-24. **That bill would have seen foreigners who obtain Canadian citizenship have it stripped away if they were convicted of terrorism or treason.** Galati claimed as an Italian born he would be theoretically vulnerable (as a way to gain private interest standing).

Galati v. Canada (Governor General), (A-52-15)
Galati lost his challenge to let dual national terrorists keep their Canadian citizenship. He appealed that ruling, however, the election of Justin Trudeau made this a non issue.

One thing that needs to be pointed out: **it's not like Galati was hard up for money, or that it was a single mistake. He has been doing this for many years.**

4. Galati Billed \$800/Hour For Nadon Case

Galati v. Harper, 2014 FC 1088 (CanLII)

Galati v. Harper, 2016 FCA 39 (CanLII)

Rocco Galati, et al. v. Right Honourable Stephen Harper, et al., 2016 CanLII 47514 (SCC)

Think that it was ideological that Galati challenged a judicial appointment? Not really. He tried to claim a fee of \$800 per hour for his

work. This is excessive, as ruled the Federal Court, and the Federal Court of Appeal. The Supreme Court of Canada declined to hear the appeal. So much for principles.

5. Mainville Reference: Quebec Court Of Appeal

Galati apparently wasn't content with meddling in selection for the Supreme Court of Canada. He also tried to interfere with the selection of a Justice to the Quebec Court of Appeal. This time though, he failed.

6. Constitutional Rights Centre Inc.

The Constitutional Rights Centre Inc. ("CRC") was incorporated, in Ontario, in November, 2004. From 2004 to 2013, it non-publicly, except to lawyers, operated in its development, in assisting and procuring legal counsel, with respect to constitutional cases, where counsel and/or their client, lacked the funds and/or expertise to mount, argue, or appeal a constitutional issue or case. Since 2013 it has, as co-Applicant, also initiated litigation in such cases as the "Nadon Reference" case, the "Mainville Reference" case, the challenge to the new Citizenship Act (Bill C-24).

Pretty strange that THESE are the cases that are first promoted on the main page of the website. Aren't there better causes than convicted terrorists?

The CRC is structurally organized as follows:

•
It consists of one (1) Corporate Director.
It further consists of the following Operational Directors:

Rocco Galati, B.A.(McGill), LL.B., LL.M. (Osgoode)
Executive Director (Founder) and Director of Tax and other Civil Litigation

•
Paul Slansky, B.A., LL.B (Michigan)., J.D. (Detroit)
Operational Director, (Quasi) Criminal Litigation

•
Amina Sherazee, B.A., LL.B (Windsor)., LL.M. (Candidate)
Operational Director, Immigration, Human Rights, and Women's Litigation

•
Manuel Azevedo, L.L.B. (Osgoode), LL.M. (LSE)
Operational Director, Administrative Law Litigation

From 2004 until 2013, it apparently operated as some secret organization to get counsel and funds for constitutional cases. Considering the cases they view as "worthwhile" it's not surprising that it would be operated secretly.

7. Terrorist Lawyer Manuel Azevedo, Bill C-24

When Galati challenged Bill C-24 (stripping citizenship rights from dual national terrorists), Manuel Azevedo was an Applicant along side him. Azevedo was born in Portugal, *not Canada, making him another foreigner trying to rewrite Canadian laws.* Azevedo is also a Director at the Constitutional Rights Centre.

8. Terrorist Lawyer Paul Slansky: CRC Director

Who does Galati have as Directors in his organization? **One is Paul Slansky, who also takes terrorism cases.**

...

9. Galati/COMER V. Bank Of Canada

The COMER case was previously covered on the site, and is actually a worthwhile cause. It ran from 2011 until 2017, when the Supreme Court of Canada declined to hear an appeal. The International Banking Cartel bleeds us dry. **In retrospect, however, a cynic might wonder if it was rigged from the start, given there is no justification whatsoever for our participation in such a system.**

Committee for Monetary and Economic Reform (“COMER”) v. Canada, 2013 FC 855 (CanLII)

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10. *Not Who You Think They Are*

Considering the history that the Constitutional Rights Centre Directors have defending terrorist rights. Why would sensible, intelligent people choose that as a cause to take on? Why would they try to intervene in judicial appointments?

Do they internally agree with the cases they’ve taken on, or is there some other agenda? It can’t (entirely) be about the money, as there are easier ways to get paid.

And the current case with Vaccine Choice Canada?

With the filing of the challenge in Ontario Superior Court, Rocco Galati has obtained somewhat of a cult following. The Statement of Claim is 191 pages, very repetitive, and contains a lot of argument and evidence, which it shouldn’t. 3 months later (and counting), no defense filed. *However, people should know what he really stands for. This is not to question his ability or skill as a lawyer, but rather his priorities.*

17. On December 4, 2020, the Defendants wrote and posted an article on their website, <https://canucklaw.ca/>, entitled: **“Anti-Mask/Anti-Vaxx Movement Infiltrated By Grifters And Subverters”**, dated December 4, 2020, wherein the Defendants made the following statements:

ANTI-MASK/ANTI-VAXX MOVEMENT INFILTRATED BY GRIFTERS AND SUBVERTERS

It's nice that people appear to be fighting back against the repeated violations of Canadians' civil liberties. **However, looking into them a little bit, it's not clear that they actually have the public's best interests at heart.**

1. Other Articles On CV “Planned-emic”

The rest of the series is here. Many lies, lobbying, conflicts of interest, and various globalist agendas operating behind the scenes, obscuring the vile agenda called the “Great Reset“. The Gates Foundation finances: the WHO, the US CDC, GAVI, ID2020, John Hopkins University, Imperial College London, the Pirbright Institute, the BBC, and individual pharmaceutical companies. Also: there is little to no science behind what our officials are doing; they promote degenerate behaviour; and the International Health Regulations are legally binding. See here, here, and here. The media is paid off, and our democracy compromised, shown: here, here, here, and here.

2. Who Should Be Looked Into

Given the deliberate and preplanned efforts of various Governments around the world to strip people of their basic rights, it's natural to flock to people fighting back. However, something really seems off about the groups presented below.

- **Rocco Galati, Vaccine Choice Canada**
- Action4Canada
- Hugs Over Masks
- No More Lockdowns
- Chris Saccoccia, (a.k.a. Chris Sky)
- Lamont Daigle, The Line
- Rebel Media

They may be legitimate, but there are many things that don't sit well. This isn't "infighting". It is exposing what is really going on to the general public.

In fairness, they shouldn't be disregarded entirely, as they all do speak a considerable amount of truth. But the public isn't getting the entire story.

3. Rocco Galati, Vaccine Choice Canada

Many people in Canada know about the lawsuit filed in Ontario Superior Court, Toronto Branch, on July 6, 2020. The Case Number is: CV-20-00643451-0000. While that sounds great, serious questions need to be asked.

There are only 5 service addresses listed in the Statement of Claim, despite there being over a dozen Defendants listed. **So have they actually been served? When, and how many?**

No service address provided for:

- Justin Trudeau (Prime Minister)
- Theresa Tam (Public Health Officer of Canada)
- Patty Hajdu (Health Minister of Canada)
- Marc Garneau (Transport Minister of Canada)
- Doug Ford (Ontario Premier)
- David Williams (Ontario Chief Medical Officer)
- Christine Elliott (Health Minister of Ontario)
- Eileen De Villa (Toronto Chief Medical Officer)
- Stephen Lecce (Education Minister of Ontario)
- The CBC (Canadian Broadcasting Corporation)

Another point that never made sense: Denis Rancourt is listed as a Plaintiff in the July 6, 2020 lawsuit. However, he is also (supposedly) their expert witness.

This is an enormous conflict of interest, **if true**. Expert witnesses are considered "friends of the Court", and are expected to act neutrally. Obviously that can't happen if that expert is also a Plaintiff, and not one in an \$11 million case. No sensible Judge would allow that to go ahead.

Now, Rocco Galati has given countless interviews about his lawsuit being filed, but there is never any sort of follow up on where things stand. The likely reason is that there has been no progress at all in that case.

There is a single Notice of Intent to file a Defense (not an actual Defense), filed on September 30. This was on behalf of Windsor-Essex County, and their Chief Medical Officer, Wajid Ahmed. No defenses have been filed, no motions, no requests for extension, and no court appearances.

For all the money that Vaccine Choice Canada (and their lawyer) have taken in, *it seems that no case is proceeding.*

There had also been talk about filing an application for an injunction — against forced masks for students in Ontario schools. Galati had said it would be added to the case as soon as possible. **But it wasn't necessary to do that. An Application for Judicial Review *could have been started separately, and back in August. It hasn't been. Surely, hundreds of parents would have volunteered to be clients.***

It's also worth noting that Vaccine Choice Canada has another lawsuit filed in October 2019, against the Ontario Government. Galati was the lawyer for that as well. This was also in Ontario Superior Court in Toronto, Court File #CV-19-00629810-0000. **A defense was filed in that case, but otherwise it appears to have gone nowhere as well.**

Unrelated, but a lawsuit was threatened against this site, for defamation, simply for publishing a part of Rocco Galati's real record as a lawyer. To date, nothing has proceeded from that.

Galati freaked out and made threats based on the TRUTHFUL disclosure of the kinds of cases he takes. However, he's been silent over repeated questions about what is actually going on with this one.

...

From the September 13 rally in Vancouver, Action4Canada asked for money to launch a lawsuit against the B.C. Government. Money poured into the fund. In fact, it seems that they are still asking for donations online. Seriously, asking for \$1 million? The fundraising continued into October. And who doesn't love religious freedom?

All of this sounds great, except one major problem: a lawsuit has never materialized. Sure, the fundraising and requests for donations are still ongoing, but there is no actual case. **And who would do it, Rocco Galati? Isn't he "not doing" enough lawsuits already?**

Fundraising for legal cases is also promoted by Liberty Talk Canada, a new YouTube channel that recently sprung up and has exploded in growth. That growth isn't organic at all, but the money keeps coming in.

One point raised by Vaccine Choice Canada: Galati spends hours answering messages and doing interviews. Okay. **Why isn't he working on the case, where his attention is most needed?**

Of the "donations" that Odessa is asking for, people should know that it's **NOT** all going towards a BC case. **A chunk of it will be given to the case that Rocco Galati ISN'T advancing in Toronto.** Also, a full 25% of the proceeds will be kept. Nice bit of transparency.

Finally: this is superficial, but looking at Odessa's blank expression, there's something that seems off about her.

...

18. In or around December 4th, 2020, the Defendants also posted a Defamatory video on the website, <https://canucklaw.ca/>, YouTube account, Canuck Law, and on their Bitchute account: Canuck_Law, where Defendant, Alexandra Moore, read much of the defamatory content, from the above defamatory articles, out-loud in a dark room, which article the Defendants posted on the website, Canuck Law, the YouTube account, Canuck Law, and on the Bitchute account: Canuck_Law.
19. These defamatory statements and publications made by the Defendants, above, are false, uttered with malice, without justification, with insidious racist overtones, and constitute irresponsible journalism. These statements tend to diminish the reputation of Rocco Galati in the reasonable and fair minds of the community.
20. The Defendants accuse Rocco Galati of "not having the public interest at heart", that he should be "looked into", that he "isn't given the entire story". The Defendants call lawyers "scum", and imply that he is scum too because he is a lawyer. The Defendants repeatedly suggest that Rocco Galati is "not doing anything" or isn't working on his lawsuit thus alleging professional misconduct and incompetence. Furthermore, by

explicit language the Defendants falsely state over and over, that Rocco Galati is not “Canadian” but a “foreigner meddling in our affairs”, by express terms and innuendo imply that he is a terrorist, and shares terrorist ideology. Moreover, by expressed terms and innuendo the Defendants accuse Rocco Galati of:

- (a) Violating the rules of professional conduct for a lawyer;
- (b) Being immoral;
- (c) Fraud;
- (d) Being a subversive foreigner;
- (e) Taking on cases not to earn a living, but rather for unethical or illegal reasons;
- (f) Operating secretly and, by innuendo, of supporting terrorists, or of being a terrorist himself;
- (g) The Defendants further misstate the facts in the case of *Horace* who was murdered before the case was finalized;
- (h) The Defendants suggest that *Comer* case was rigged to lose by Rocco Galati;
- (i) The Defendants state that Rocco Galati, as a Director of the Constitutional Rights Centre Inc., shares terrorist ideology.

21. The defamatory comments are extremely racist both explicitly and by innuendo. The Defendants indicate that Rocco Galati is **not** a Canadian because he was not born here, and state that holding a Canadian passport does not constitute being a “true” Canadian. Rocco Galati immigrated to Canada in 1966. He became a Canadian citizen in 1976.

He holds no other legal citizenship, having lost his Italian status upon becoming Canadian.

22. All the comments against Rocco Galati are further laced with innuendo of incompetence based on a racial bias. Rocco Galati has been a Canadian Citizen since 1976. Any such distinction between born Canadian and immigrated Canadian can only be found in vile racism.
23. After receiving hundreds of requests to do so, the Constitutional Rights Centre Inc. drafted small claims templates with pleadings attached, which they made available for purchase for a modest, nominal fee of \$90 on the Constitutional Rights Centre's website, for persons who wished to represent themselves in Small Claims Court against institutions who have refused to abide by the guidelines and exemptions with respect to masking during COVID-19. These templates, and pleadings, had taken months to prepare, which people would be able to purchase and use. These forms had sections that required some "fill in the blank" as well as provided all the standard court forms, required for any proceeding, which would need to be populated by the purchaser. The product being sold, however, was not the standard court forms that were also included in the package, but the pleaded the structural facts and the law.
24. On December 15th, 2020, the Defendants published and then tweeted the following further content on canucklaw.ca and other social media platforms, stating that Rocco Galati and the Constitutional Rights Centre was simply selling the standard **blank** courts forms which are otherwise available online for free, in order to sucker and con innocent people out of their money. The statement disseminated was:

“While absolutely nothing happens in July 6 lawsuit with @VaccineChoiceCA, their lawyer @roccogalatilaw has a new gig: selling court forms to suckers.

Have to admire the nerve of a man who can sell documents (available for free online), for \$90 each.”

[The Defendants then post a video created by the Defendants, entitled “Galati/CRC Selling Court Forms for \$90 Each “which are Free”]

25. And in the comments, the Defendants further stated:

‘Galati will SELL you these templates, or you can just get them for free. If you buy from him, you are being suckered. This is Ontario Small Claims: [Post links to Small Claims forms]”

26. On December 15th, 2020, the Defendants published a video comprised of clips of Rocco Galati’s instructional video concerning how to download and use the template, without showing the full video, where it is obvious that what is being offered by the Constitutional Rights Centre, at the request of many, is NOT the free blank court forms available online, but rather a template with pleadings with factual matrix and the law written for the purchaser.

27. Although not required, the Defendants were served a further s.5 **Libel and Slander** Notice on December 23rd, 2020.

28. On December 28th, 2020, the Defendant’s published an “apology” that was not an apology but rather a back-handed reiteration of the defamation meant to further defame the Plaintiff, as follows:

An Apology/Retraction To Constitutional Rights Centre, Rocco Galati

A few articles have been retracted that concerned Rocco Galati and the Constitutional Rights Centre, as they are inappropriate and demeaning. About the specifics that need to be corrected:

Apologies for suggesting that lawyers are scum. In reality, the profession is entirely noble and honourable, and comments to the contrary are based on ignorance and/or malice.

Apologies for any potential inference that could be drawn between a lawyer and their clientele. Lawyers who represent terrorists should not be labelled “terrorist lawyers”. **Likewise, lawyers who take mafia cases should not be called “mob lawyers”, and lawyers who take criminal cases should not be called “criminal lawyers”, etc....**

Apologies for using the term “agitator” to describe a person’s record. **Surely, the cases they take on do not necessarily reflect any privately held beliefs and opinions. Work is work, and personal is personal.**

Apologies for any suggestion that fighting for terrorists to keep their citizenship, or challenging judicial appointments somehow amounted to subversion or lawfare[sic]. **There are people who believe these to be legitimate causes.**

Apologies for suggesting that serious criminal charges, convictions and/or security risks should be grounds for stripping someone of their citizenship. **Despite this being practice in many countries, it’s wrong, xenophobic, and racist to treat people like that. A Canadian is a Canadian.**

Apologies for making any distinction between naturalized and born citizens, or implying that people simply aren’t Canadians. **This was uncalled for. As the Charter and Citizenship Act view them as the same, so there is no debate on the issue.**

Apologies for suggesting that citizenship was anything beyond obtaining the required paperwork, and that place of birth should be an issue at all. **After all, having the status means loyalty to the adopted country.**

Apologies for criticizing the current refugee pathways as abusive, and in particular, people fleeing from the United States. **Surely, this is short-sighted with regards to the big picture, and everyone, no matter the situation, deserves a fair hearing.**

Apologies for suggesting borders should exist at all. **After all, if a person’s lineage in Canada doesn’t trace back thousands of years, they are in no position to keep anyone else out today. Such a stance is racist.**

Apologies for suggesting certain ideologies are incompatible with the West. After all, diversity is our strength, and no sensible person would disagree.

Apologies for wondering and questioning why urgent cases sit dormant for months, even as vaccines arrive and are being administered. Certainly, there are valid explanations for these delays, and ulterior motives must never be assumed.

Apologies for watching a video and thinking it meant forms being sold, instead of a pleadings package. More due diligence should have been done in advance. And yes, if people wish to purchase the products, that is absolutely their right to do so.

Apologies for suggesting the Federal Government may have influenced or rigged the Bank of Canada case. The rulings they handed down may seem suspicious to the casual observer.

The articles in question have now removed. Nothing here should be interpreted as to detract from the reputation of Galati and the Constitutional Rights Centre, in the opinions of fair-minded people. They are committed to upholding the freedoms we hold dear (including, but not limited to), free speech, free association, viewpoint diversity. More than ever, controversial views must be protected from tyrants who would silence dissent and/or shut down media outlets.

29. The Plaintiff states that this “apology” is a sarcastic recantation of the defamation itself. Nowhere in this “apology” are the statements retracted and admitted to be false, malicious, and causing harm to the Plaintiff. The statement has the pre-ambling sarcastic incantation of “apologies for...” followed by a back-handed repetition of the defamation. The Plaintiff states that this further defamation is further evidence of malice calling for punitive damages.
30. On January 7, 2021, in response to the email serving the s.5 **Libel and Slander** Notice, the Defendant, Alexandra Moore, informed the Plaintiff’s counsel who had written the s.5 notices, that she was pursuing a Law Society Complaint against her as a

result of receiving the s.5 **Libel and Slander** Notices. This is further evidence of malice calling for punitive damages.

31. On January 9, 2021, the Defendant, Alexandra Moore, followed up on her January 7, 2021 email, addressed to counsel for the Plaintiff, by stating that if the Law Society of Ontario did not take her seriously, that she would pursue her complaint with the BC Supreme Court, against counsel for the Plaintiff, which is further evidence of malice calling for punitive damages.
32. The Defendants continue to post on <https://canucklaw.ca/> social media platforms about the COVID-19 court case, falsely stating that nothing has happened in the COVID-19 court case, and continuing to state and imply that the Plaintiff have taken money wrongfully or for collateral purposes thereby proliferating and magnifying their original defamatory statements.
33. The Defamatory statements escalated once again in summer of 2021, when, on July 27, 2021, the Canuck Law Website produced an article entitled, **“Vaccine Choice Canada, Action4Canada Want More Money For Cases (Still) Not Happening”**, purportedly written by a person named “Ronnie”, as follows:

**Vaccine Choice Canada, Action4Canada Want More Money For Cases
(Still) Not Happening, July 27, 2021 by Ronnie**

On July 21, 2021, we had our latest round of panhandling from Tanya Gaw (Action4Canada) and Ted Kuntz (Vaccine Choice Canada). They are asking for money for what they claim are lawsuits to challenge various Governments in Canada.

What people choose to do, and choose to file in their private lives is their business. That being said, when it involves constantly asking the public for money, it's fair game to report on what's actually happening. If those donations aren't be used as advertised, then it's even more important.

This is an almost identical script from a year ago. Action4Canada needs money to start a suit, and Vaccine Choice Canada needs more to keep theirs going. In a way, not much has changed. Thankfully, it seems that far fewer people are buying into it at this point.

[posts video]

Of course, it doesn't help that misinformation videos like this surface, telling of non-existent court rulings. Whether intentionally, or by cluelessness, some with large audiences spread false stories of secret court decisions fixing everything. This doesn't help either. It takes advantage of widespread ignorance.

Keep in mind, that places like Ontario allow members of the public to search for cases online. All one needs are the parties and/or case number. One can see who has lawyers, and when they are next expected in court. If people are unrepresented, that information is also available. Similarly, the Supreme Court Of Canada publishes its rulings, as does the Federal Court, and CanLII is also a great source. Also, individual courts can be contacted for information or documents.

In their December 2020 update, Vaccine Choice Canada lamented how no mainstream media had seen fit to cover such an important event. **However, they didn't mention (and still don't mention), that THIS SITE was threatened by them for exposing the grifting going on.**

[image of lawsuit]

This is the infamous case (CV-20-00643451-0000) filed July 6, 2020. Forget trial, this may very well get dismissed for lack of prosecution the way it's going. Seriously, is no one asking what's going on?

Gaw says that a statement of claim is in the works in B.C. Apparently, it going to be 425 pages, or more. This would easily double the 190 pages Vaccine Choice Canada submitted. These aren't supposed to encompass everything under the sun. While such a document may look impressive, it will grind down the proceedings (if they ever happen) considerably.

Yes, there was a temporary moratorium on filing deadlines in Ontario, and that ended September 14, 2020. That was nearly a year ago. Interestingly, the length of time that elapsed since that happened is never made clear.

Kuntz also claims that no statement of defense has been filed in that year. While true, it raises the obvious question: why was no application for default judgement ever sought? Or for that matter, why was no effort to force the case forward ever sought? Orlewicz never asks the question either. If a Defendant plays games or won't answer a lawsuit, this is serious what litigants do.

By the way, this case is nearly 2 years old, (CV-19-00629801-0000), and hasn't gotten past the pleadings stage. Children are being vaccinated right now. Keep in mind, the organization asks for money under the guise of pursuing such claims diligently.

Throughout the talk it's stated that there is a grand plan, and Galati knows what he's doing. Sure, nothing is happening currently in the public, but trust the plan. **Not that it gives off Q-Anon vibes or anything. Also, Operation Trust from the 1920s is worth looking into.**

Gaw makes the nonsensical statement that she doesn't want to show her cards at the moment. Okay. So, she and Kuntz are streaming on YouTube with Orlewicz and asking for money for their lawsuits, but they don't want to reveal their moves to the Government. They don't want their strategy being known by their enemies. They seem unaware that YouTube is a public platform, that any person can access at anytime.

These people say (or at least imply) that the emergency orders in B.C. and Ontario were allowed to lapse because of the cases Galati has in those Provinces. Funny, since there is **NO CASE** in B.C., just the promise to start one at some point. As for Ontario, Ford's people take the matter so seriously that no defenses were ever filed. And again, no effort to force a default judgement.

Both Gaw and Kuntz state that there are many thousands of pages of evidence, including affidavits that run to the thousands of pages individually. Great way to not show your cards. Anyhow, no Judge is ever going to read something of that length. Even if such documents were submitted (which seems unlikely), the Defendants could immediately ask for a delay of several months.

As for the Gill lawsuit that's referenced, that is a defamation case over things said on Twitter, (CV-20-00652918-0000). It will have no impact whatsoever on Government imposed lockdown measures. Sure, it looks and sounds great, but is a diversion from bigger issues.

Kuntz boasts about how the various Governments have no reply to the July 2020 lawsuit. But he would probably be utterly speechless if someone asked him why he never followed up. It's not like it's just a few days late.

Do any of the Plaintiffs in the July 6 case find it strange that in a year, there have been no updates? There was a Notice of Intent to file a Defense on September 30, 2020 from Windsor-Essex County and their Doctor, Wajid Ahmed, but nothing since then. Not only that, only the County and Ahmed have anyone listed as representing them. The establishment fears Galati so much, they can't be bothered to even lawyer up. Why is that?

[image of Statements of Claim address page]

One obvious explanation for the lack of progress would be a question about the legitimacy of the service. Only a handful of service addresses are listed in the July 6, 2020 case. True, a number of them can go together, such as the Ontario Attorney General and Her Majesty in Right of Ontario. However, all addresses must still be provided.

[image]

Here are just a few examples. None of the Federal Government, Ontario Government, City of Toronto, or either Attorney General of Canada or Ontario bothered to file a response. They also never obtained counsel or filed a notice of appearance. This isn't a joke. **They know Galati isn't serious, so they don't even go through the motions of playing along.**

Moreover, the CBC implies they weren't served at all. In their August 2020 article, they claim to have "obtained an unredacted copy". That's not service (if true). That's someone calling up the court to order a copy. CBC alleges that Galati spoke to the CBC but didn't agree to an on the record interview. Further attempts to secure a public interview weren't successful. In some sense this might be forced. Pretty hard to claim censorship when the national broadcaster is offering a platform. One can only guess what CBC would have asked, but it would be interesting.

They also claim that Vaccine Choice Canada threatened to sue them over how they cover various movements. That accusation is surprisingly believable.

Perhaps if a convicted terrorist was about to lose their citizenship, this may be seen as more of an emergency.

A minor point, but page 4 of the July 2020 Claim lists Trudeau and the Federal Crown as "dispensing with Parliament, under the pretense of Royal Prerogative". Isn't that the Governor General who exercises Royal Prerogative?

In the end, what do we have here? A group in B.C. promises — STILL — to file a lawsuit at some point. They just need more cash, and have been at this for nearly a year. In Ontario, there are 2 lawsuits (1 is specific to vaccinating students), and neither are progressing. Doesn't seem very urgent. However, the begging continues.

Again, if this was their private business, then who cares? But they are endlessly asking the public for money, for the promises of lawsuits.

[image from statement of claim]

Guess we'll have to see if this one goes anywhere (CV-21-00661284-0000). At least most of the Respondents have representation listed, so there's that. It was filed April 2021, over 3 months ago, and no court dates are set. Or this one (CV-21-00661200-000). Denis Rancourt is listed as an expert witness in both, which is interesting considering he's also a Plaintiff in the July 2020 case that's sitting in limbo. Is that why his name was scrubbed? So people wouldn't connect the dots?

Interesting side note on the Sgt. Julie Evans case, the Attorney General used Rule 2.1.01 to try to get the case dismissed. However, it's meant for very obviously defective cases. If the AG was serious about this, why not use a regular Motion to Strike? Was the goal to launch a half hearted effort to make it appear to challenge the case?

If someone makes wild claims about secret court rulings ending all measures, but can't provide any specifics, it's probably a hoax. These things are very easy to search. In a similar vein, if someone wants help financing a case, but never provides updates, there's probably something going on.

To those reading this: it's your money, and you can spend it however you like. That said, you should know where it's going and what is happening with it. It's truly sad how few do even the most basic research. But then, suckers are born every minute.

34. The above article includes much of the same defamatory content as previous publications, such as claiming that the July, 2019 lawsuit is/was a hoax, that the Defendants were intentionally delaying proceedings, that the Plaintiff is connected with illegal or dangerous organizations, engaged in counter-intelligence or is

controlled opposition, and that the Plaintiff is misleading or not acting for the public interest. All of these statements are false, malicious and defamatory.

35. More particularly in this article, the Defendants accuse the Plaintiff of spreading misinformation, by attributing statements and claims to the Plaintiff that the Plaintiff did not make. The Defendants then state that this misinformation is being spread by the Plaintiff.
36. The Defendants finally imply that the Plaintiff is connected with Q-Anon.
37. On August 9, 2021, “Ronnie” wrote and published on Canucklaw.ca an article entitled “**Why I believe Rocco Galati is Controlled Opposition**”. This article, at the same time, endorses another article of the similar name, “**why I believe Rocco Galati is controlling the Opposition**”, published by another anonymous party on the website “Overdue Revolutions”, on July 17th, 2020, as follows:

Why I Believe Rocco Galati Is Controlled Opposition

[image]

Over the last 20 years or so, Rocco Galati has tried to project himself as a constitutional lawyer, fighting for the interests of Canadians, and humanity as a whole. However, looking more into it, I’ve come to believe that this image and persona are entirely artificial. **I think he’s actively working against Canadians.**

Since this will almost certainly result in more threats, a little disclaimer is needed. This is based on information readily available, and also, there is no intent to mislead or deceive. Given the circumstances we face, truth becomes even more important. Keep in mind, the Ontario Libel and Slander Act contains many built-in defenses for writers and publishers. Furthermore, anti-SLAPP laws prevent people from suing simply to shut another person up.

For extra information, Overdue Revolutions wrote a detailed article on July 17, 2020, outlining many of the same concerns. It is well worth a read, as is the overall “resistance” to Trudeau being controlled. One point the

first article was spot on about predicted that Galati “appearing” to challenge Trudeau in the July 6 lawsuit would convince others that it was all taken care of — and that any outcome can be manufactured. However, the plan seems to be to leave it in limbo, at least for now.

Now, getting to the heart of the matter:

As a starting point, it’s a little strange that a person who claims to be censored is in the Canadian media so often. CBC has hosted Galati countless times over the years. True threats to the establishment aren’t given airtime on the national news.

It’s also curious to note that the CBC never threw Galati under the bus over that bogus July 6 lawsuit. Sure, they did a half hearted piece about how this poorly written, and rambling document was likely to be dismissed. And it would have been. However, they could have done so much more damage if they reported that it was still sitting a year later. Then again, lawyers for Trudeau, Tam, Ford, etc.... could have exposed this. It’s been covered many times on Canuck Law. **Have to wonder when the “establishment” media and politicians protect the “resistance” lawyer who’s taking them to task.**

1. Comments Like This Never Questioned By The Public

[Video Player clip]

This video is a clip from a January 2015 interview, posted in February (see 10:45). Apparently, there are too many white men on benches, and this “white supremacist” system is appalling. The topic wasn’t relevant to the issue of banking practices in Canada, or the COMER case, but the contempt and disgust spills out anyway. In fairness, this was 6 years ago, but is there anything to indicate his views have changed at all?

Have to say, this rant comes across as pretty racist. Can you imagine if those remarks were directed at another group? Also, it was an interview, intended to be aired, not things said at a private event.

2. Representing Assets, Strange Cases

The law is a very broad field, and a lawyer will encounter many types of clients and cases in their careers. However, here are a few that might make people take notice, as they are unusual:

- **Galati represented Abdurahman Khadr in 2003, a suspected terrorist who was brought back to Canada. Khadr claimed to be a CIA informant, making his representation by Galati very odd.**

After all, this was a lawyer who prided himself on working against the Government.

- Another noteworthy client was Delmart Vreeland, supposedly a Naval Intelligence Officer. He was arrested in 2000. Vreeland claimed to have information about upcoming attacks that needed to be prevented.
- Galati challenged the appointments of 2 Justices: Marc Nadon (Supreme Court of Canada); and Robert Mainville (Quebec Court of Appeal). **What motivated these, and was there was some client behind the scenes? Also, getting paid for the Nadon case must have been important, given the applications to the Federal Court, Federal Court of Appeal, and Supreme Court of Canada.**

3. Bank Of Canada, COMER Canada Infrastructure Bank

COMER, the Committee on Monetary & Economic Reform, sued the Federal Government in 2011. On paper, this seemed a noble and worthwhile goal, although there may be more than meets the eye. **Overdue Revolution covers it pretty well, including the founders of the organization.** Strange how the Canadian Infrastructure Bank seemed to rise from the ashes of this case. It's an organization handing out money for construction and development, and is even less accountable than the Bank of Canada.

The other consequence of losing the Bank of Canada case means that any future challenge to the banking system will be next to impossible. Read into that what you will.

Now, Rob Carbone, of the fake "Republican Party of Canada", claims to own the Canada Infrastructure Bank. He hangs around the protests a lot, pretending to be a wealthy businessman, larping as a billionaire, apparently with access to trillions of dollars in assets. Supposedly, Chris Saccoccia is planning to become Finance Minister one day. The entire story is nonsense.

4. Citizenship For Convicted Terrorists/Traitors

[image]

June 25, 2014, **Galati and Manuel Azevedo sued the Governor General of Canada, the Attorney General of Canada, and the Immigration Minister. This was to stop Bill C-24, which would have stripped the dual nationals of their Canadian citizenship if convicted of terrorism or treason. This has nothing to do with guilt or innocence, but letting monsters enjoy rights they don't deserve.**

Curiously, Galati and Azevedo tried to use their own dual citizenships (Italian and Portuguese respectively), in order to gain private interest standing. On

January 22, 2015, the Application was dismissed by the Federal Court. An appeal was filed (File #A-52-15).

It would have been nice to know who was really behind this challenge. Presumably, Galati and Azevedo are busy lawyers with a lot to do. A bewildering choice, unless there was someone behind the scenes, directing the action. Could they have picked a less deserving class of people?

After Trudeau took office in late 2015, Bill C-6 was one of the first pieces of legislation introduced. Hearings began in April 2016. The Bill passed, making the Appeal moot, and it was formally discontinued in September 2018.

One of Galati's clients in 2006 was Ahmad Mustafa Ghany, who was (allegedly) one of the Toronto 18 suspects. The charges against him were eventually stayed. The ringleader, Zakaria Amara, was scheduled to have his Canadian citizenship stripped away following his conviction and life sentence. However, he won't now. Just a thought, but this may be the real reason (at least in part), why Galati and Azevedo challenged Bill C-24.

True, everyone has the right to representation, even accused terrorists. That being said, this is a bizarre way for these lawyers to become household names.

5. The Boyle & Khadr Families

[images]

In 2003, Galati worked to secure the release of Abdurahman Khadr, older brother of Omar Khadr. He was being held on suspicion of terrorism. Supposedly, he "implored the public earlier this week to not judge him since he did not face any charges while in American custody for the past two years. But at the same press conference, Khadr later admitted that in the summer of 1998 he attended a notorious training camp in Afghanistan, which Osama bin Laden is rumoured to have visited."

This is not to imply that Galati is involved in terrorism, but again, it's certainly unusual for a tax lawyer to take this path. Of all the areas of law that are out there, why is a person drawn to terrorism cases? However, there would later be new ties to the Khadr Family revealed.

If your wife is pregnant, taking her backpacking through a warzone in Afghanistan isn't really the best idea. But that's what Joshua Boyle supposedly did. Allegedly, they were kidnapped in 2012 and held prisoner for 5 years. However, they had 3 children in the meantime, making their "captors" some of the nicest people imaginable. The story is farfetched, to put it very mildly.

On December 19, 2017, photographs were posted of a meeting meeting between Trudeau and the Boyles. Now, people can't just get in to see the Prime Minister, as they would have to be cleared by the RCMP. Interesting, that Trudeau didn't see him as a threat. Interesting, to have a Twitter account with the name BoylesVsWorld.

Boyle used to be married to Zaynab Khadr, making him the former brother-in-law of Omar Khadr. This is the convicted terrorist who attacked the American army and was captured in 2002 in Afghanistan. Khadr became a multimillionaire as a result of a lawsuit years later. Trudeau handed over \$10.5 million of taxpayer money, without putting up any real resistance.

Boyle was later charged with 19 offenses, including assault, sexual assault, and forcible confinement. He was acquitted by the Judge.

As a bit of an aside, Joshua's father, Patrick Boyle, was a connected Judge with the Federal Court, in the tax department. Galati got his start in law working with the Government as a tax lawyer. But that's probably a coincidence.

While the above sections related to past and historical information, let's look at something more recent: the so-called challenges to the medical martial law imposed by various Governments.

6. Controlled Opposition To Lockdowns In Canadian Courts

[image]

In December 2020, Galati filed a defamation suit against a bunch of people and a few media outlets over comments and publications involving Kulvinder Gill and Ashvinder Lamba, (file #CV-20-00652918-0000)

While touted as being a way to fight back against censorship of doctors, this does no such thing. Instead, it sues a variety of people and organizations over mean words. And suing private individuals won't result in policy changes. Looking at the statement of claim, we can see what exactly it being sought. Quoting pages 5 and 6:

[image]

Even if this lawsuit is successful, nothing will change in the big picture. Sure, Gill and Lamba may become millionaires in the process, and apologies might

have to be issued. That said, lockdown regulations and policies will not be impacted in the slightest.

To everyone donating to the Constitutional Rights Centre, you will never see a penny of this money. You're just subsidizing private litigation.

Looking up the case online, it seems that many defendants don't have lawyers. However, in situations like this, it's fairly common to pool funds to have a single lawyer represent multiple people. According to the records, the next scheduled appearance is September 27, 2021.

Feel free to read the Statement of Claim, which is publicly available. The 2 Plaintiffs are seeking at least \$12.75 million, over rude tweets and publications.

Just a personal take, while distasteful comments were made, these are hardly worth suing over, and don't merit such an action. Even taking everything at face value, this is not \$13 million in damages. And such a claim would probably be thrown out if a SLAPP Motion (Strategic Lawsuit Against Public Participation) were filed. And again, even if the Plaintiffs won, it would create no policy changes whatsoever.

[image]

As for the comments that Gill goes around blocking people, there is a high degree of truth to that. Besides, how can a person sue another for commenting on someone else's blocking rates? Rempel may still be on top, but she's facing some competition.

A source close to this mentioned that depositions took place in July. That's interesting the case is moving ahead, considering how insignificant it really is.

A private defamation gets Galati's attention, but these don't. It's been addressed repeatedly on this site how 2 claims by Vaccine Choice Canada remain in limbo. One is from October 2019 and involves mandatory vaccination of Ontario students (CV-19-00629801-0000). Another is the infamous one from July 2020, which would end all measures completely, (CV-20-00643451-0000). Supposedly, a group called Action4Canada will be filing a lawsuit in B.C., but hasn't, even after fundraising for a year.

What litigation people pursue privately is their business. When one repeatedly asks for money to support litigation, it becomes everyone's business.

There have been rumours circulating that there are all these Affidavits ready to drop on Trudeau and his cronies, and it's all coming together. Thousands of pages of evidence is about to be submitted, and the Courts will fix it all. Basically, trust the plan. Don't worry, there is a major effort behind the scenes, and everything is being taken care of.

[1] Diligently push a case that impacts nothing long term.

[2] Let potentially groundbreaking cases remain idle.

[image]

The Defendants in the July 6, 2020 case (excluding Windsor-Essex Country and their CMOH) haven't even bothered to lawyer up. And no attempt was made to force a default judgement. A cynic may wonder **if there was collusion involved, an agreement by all parties to do nothing. The Statement of Claim was written up in such a piss poor manner — and maybe that was deliberate — that it would be struck by any challenge filed.** Considering that the Claim alleges serious human rights violations, it seems odd to be worth only \$11 million, far less than the defamation case.

Considering that the real cases (again, publicly funded) are going nowhere, how exactly can Galati justify spending his time patrolling Twitter, dropping Section 5 threats, and then start suing nobodies?

One could argue that this is just a convoluted strategy, or that there is some grand plan. **However, this looks like an effort to “appear” to be fighting against the Trudeau/Ford agenda, while ensuring that it continues. In short, this seems to be an attempt to neutralize real opposition.**

Interesting side note on the Sgt. Julie Evans case: the Attorney General used Rule 2.1.01 to try to get the case dismissed. This is the Police on Guard for Thee. However, it's meant for very obviously defective cases. If the AG was serious about this, why not use a regular Motion to Strike? Was the goal to launch a half hearted effort to make it appear to challenge the case?

7. Selling Basic Information To Self Represented Litigants

[video player clip cut and edited by the Defendants]

This offer no longer appears to be available, but it was in late Fall 2020. For the low, low rate of just \$90, you could purchase half filled Court

forms to sue businesses and the Government. Of course, it came with the disclaimer that this didn't mean you were represented, and that Galati and Co. were indemnified from any consequences. This meant the lawyers assumed no responsibility, no matter what ultimately happened. This is pretty much the safety that vaccine manufacturers enjoy. People would literally be sold the rope to hang themselves with, and the lawyers drafting the papers are laughing all the way to the bank.

Just a hunch, but perhaps this product was stopped because it was a liability. The Law Society of Ontario may view this as selling legal advice, regardless of whatever disclaimers were added. We see more of the same pattern with these legal challenges:

[1] Divert attention with relatively minor matters.

[2] Ensure the big cases never move ahead.

Sure, desperate people could purchase these forms if they wish, and some will buy anything. Now, where does the money from these purchases go? Where does all of the donations for the "lawsuits" go? Unfortunately, too few people ask those difficult questions. This isn't something where you can just write a cheque and forget about.

Just like with the Gill/Lamba suit, such claims against private parties will not result in any public policy changes. Sure, some will win their cases, but it doesn't mean the Provincial dictates suddenly become void. There will be no lasting effects outside of individual claims.

Now, had some basic informational videos (not advice) been posted instead to let Canadians know of their options, that would have been a really stand up thing to do. However, this comes across as pretty scummy.

8. Controlled Opposition To Lockdowns In Canada

[image]

It's typically wrong to judge people by the company they keep. However, in this case it's relevant. Beyond the Courts, the psy-op is preserved by managing and controlling the protests against these measures. Many of the people leading them come across as grifters and subversion agents, while others present as intelligence operatives. After a bit of searching, it becomes clear that it's the same group of people running everything. Let's take a quick look.

As addressed earlier, it seems that the anti-lockdown political efforts aren't a real solution. People like Maxime Bernier claim to support freedom, but will never talk about the experimental nature of these "vaccines" being pushed on children. Likewise, a party that cannot put together a basic structure in 3 years should not be taken seriously. This principle also applies to the Republican Party (Carbone), New Blue Ontario (Karahalios), and Maverick/WExit (Hill), who have each had a year or more. None of them even have an internal constitution, effectively making them dictatorships. Rob Carbone, of course, supposedly is in control of the Canada Infrastructure Bank.

You also have to question the thinking of those promoting the rise of unelected people. Yes, traditional parties have failed. So let's get rid of that, and install someone not chosen by his people, and not restricted by any constitution or governing documents. If you want to save Canada, get rid of democracy. It's absurd, trading one set of tyrants for another.

Even so-called renegade politicians like Roman Baber and Randy Hillier will only go part way. They'll complain that these measures are heavy handed, but never call out the medical fraud for what it is. They feed "hopium" to the masses, trying to delude others into believing a political solution is possible.

[image]

Kelly Ann Wolfe has been one of the prominent voices from the beginning. However, she has asked (or claims to have asked) the Canadian Military to intervene, and is in talks with the U.S. Armed Forces See 18:30 in the video. Strange how she can openly call for the Government to be overthrown, but is allowed to speak openly. Not a peep from anyone here. You'd think that Wolfe calling for a military dictatorship would be a cause for concern, but apparently not.

According to her own biography, Wolfe is connected to:

- Hugs Over Masks (Sobolev)
- Mothers Against Distancing (Saccoccia)
- Freedom Forum Canada (Black, Jamnisek)
- The Line Canada (Daigle)

Think these groups don't all run in the same circles? They do. Wolfe is just one of them, and it's pretty chilling that such a person is so intertwined in the "resistance". Think of this as a corporate empire, where the different logos are used to camouflage the fact that the companies all have the same owners.

Considering the "Fed vibes" that Wolfe gives off, it's fair to ask to what degree these protests are used as a way to monitor citizens. Why are these people

leading the opposition? Because they're ensuring that things go nowhere, following the wisdom of Vladimir Lenin.

Patrick King claims to have attended Bilderberg, which is interesting. He doesn't really come across as an investigative reporter. King is a co-Founder of the WExit Party (now Maverick), which makes it clear it doesn't actually oppose the lockdowns the Provinces push. He's also part of the Yellow Vests.

Vladislav Sobolev used the "pandemic" as an opportunity to start up a clothing line with his company, Hugs Over Masks. Yes, global tyranny is here, but let's make some quick money selling sweaters and T-shirts. One of the reasons protests fizzled out is that people like Sobolev were simply using them as an opportunity to make money. Now, are these gifters were just in it for profit, or was there a deliberate attempt to drive away real support?

Chris Saccoccia, a.k.a. Chris Sky, came out of nowhere to emerge as the "freedom fighter" for Canada. While he does say a lot of truthful things, his behaviour and appearance are a complete turnoff to normies. Maybe that was the point of selecting him, to make resisters seem like crazies. In fact, it would be difficult to hand pick a better choice. He also started a GoFundMe, and has a (defunct?) business. There's also this site, Mothers Against Distancing, or MAD, which is pretty sparse. Of course, he doesn't really need to work, since his father, Art Saccoccia, is a wealthy developer.

Sky also got himself arrested for (allegedly) threatening to kill Doug Ford. The story goes that Rob Carbone turned him in — or made it up — after their relationship soured. While this may be legitimate, it comes across as a psy-op to give the police an excuse to crack down even harder on peaceful demonstrators.

[video player clip]

Lamont Daigle of The Line is either a pedophile, or at least a pedophile sympathizer. Beyond that, this "organic" group is part of an international chain, and seems to support violence to achieve its goals. Wolfish did a great piece on organization. It's unclear if this really is an Antifa style outfit, or is just Feds pretending to be.

Hanging out with these people seems like a good way to end up on a watchlist, or at least get bamboozled into buying useless junk. It's best to not get involved with them.

[image]

Odessa Orlewicz (or is it Munroe?) was an actress about 20 years ago. She was in a few films, including Freddy vs. Jason. She promotes the grifting of Action4Canada and Vaccine Choice Canada. Her husband, Norbert, went to Langara College to study theatre. He has a formal education in acting, which should set off alarms. Are these 2 even married, or is that just a cover story they use?

In fact, a lot of the people involved seem to be performers as well. Check out their IMDb page. Maxime Bernier, James Coates, Lamont Daigle, Len Faul, Galati, Artur Pawlowski, Adam Skelly and many others all have roles in the series. Is this all just some grand production? At times it seems like it. They recently discarded Chris Sky from the cast, and perhaps Patrick King will take up the role.

Seriously, had anyone heard of many of these “freedom fighters” prior to the Spring of 2020? They all know each other, and it seems to have been the case prior to these lockdowns.

A couple exceptions: Ezra has been around writing for years in a variety of publications. Carpay has been with the JCCF a long time, which has launched challenges against a variety of measures. So it was unfair to lump them in with newcomers. (correction from original)

There is more, but overall, the entire “opposition” movement seems designed to subvert real challenges, and deter Canadians from banding together for mutual interests. While it could be dismissed as a few bad apples, it appears too coordinated. This looks like an effort to pretend to oppose martial law, while ensuring it continues on. The Court aspect is important, but it’s part of a larger agenda.

Anyhow, these are some thoughts on why I believe Galati acts as a form of controlled opposition to the Government. I don’t buy the crafted persona he sells to the public. Aside from the company he keeps, how are any of the cases he takes beneficial to Canadians? How is endless fundraisers with Vaccine Choice Canada or Action4Canada productive, when they don’t result in anything? With all of the information presented, does he really have the public’s interests at heart?

38. In these defamatory and malicious statements, the Defendants accuse the Plaintiff of “not having the public interest at heart” and of actually actively working against public

interests. Moreover, by expressed terms and innuendo the Defendants defamatorily accuse the Plaintiff of:

- (a) Being controlled opposition, and presenting a false persona;
- (b) Actively working against Canadians;
- (c) That the July 6, Statement of Claim is a bogus lawsuit;
- (d) That Mr. Galati is “racist” against white men;
- (e) That Mr. Galati lost several cases on purpose, so as to subvert the interests of Canadians;
- (f) That donations to the Constitutional Centre will go toward Mr. Galati’s private clients;
- (g) Violating the rules of conduct of his profession;
- (h) Fraud;
- (i) Being a subversive foreigner;
- (j) Taking on cases not to earn a living, but rather, as you insinuate by innuendo, for unethical or illegal reasons;
- (k) Operating secretly and, by innuendo, of supporting terrorists, or of being a terrorist himself;

39. These comments are extremely defamatory both explicitly and by innuendo, uttered with malice and untrue. Although not required, a further notice under s.5 of the **Libel and Slander Act** was sent to the Defendants on August 14, 2021.

40. In addition, in having a clickable link to “Overdue Revolutions”, the Defendants provided and endorsed the following vile article, which article is

not only blatantly false, but also includes defamatory comments against the Plaintiff:

Overdue Revolutions

Why I believe Rocco Galati is controlling the opposition

This piece is a work in progress, although I have collated enough information to be confident in the conclusions I am presenting. I am posting it now because Galati is scheduled to be speaking at the next Saturday protest at Queen's Park in Toronto. I will be updating it as I compile more research. It follows the method and research of Miles Mathis – if you are not familiar with his work and you find yourself confused by my logic, you may wish to start by reading his exposé on the OJ Simpson trial, showing it was a psy op from beginning to end.

Rocco Galati is a Canadian constitutional lawyer who on July 9th filed a 191-page suit containing 183 criminal and constitutional charges against various individuals and organizations, including Prime Minister Justin Trudeau, Chief Doctor of Canada Theresa Tam, and the CBC, on behalf of Vaccine Choice Canada. In the past Galati has defended several suspects of terrorism, throwing up immediate red flags. He has also been involved in challenging the appointment of Marc Nadon to the Supreme Court of Canada, and bringing a case against the Canadian government to restore the Bank of Canada as a lender to the government. **Wikipedia lists Galati as Jewish. This is relevant since the billionaire and trillionaire families who own the world are predominantly Jewish. That is to say, not all Jews are elite, but almost all of the elites are Jewish or have significant Jewish ancestry.**

After being called to the bar in 1989, Galati worked for the federal Department of Justice for one year, before striking out on his own and exclusively taking cases *against* the government. In 2001, he, along with Paul Slansky, defended Delmart Vreeland at trial. Vreeland claimed to be an officer for the Office of Naval Intelligence (ONI), the oldest branch of the US intelligence community. Vreeland had, according to the story, produced a note predicting the 9/11 attacks. According to *Crossing the Rubicon: The Decline of the American Empire at the End of the Age of Oil* by Michael Ruppert, Chapter 11, "Neither [Galati nor Slansky] had the slightest doubt that Vreeland had worked for the Office of Naval Intelligence or in some similar capacity, possibly for the CIA." Ruppert reports that the two lawyers spent months in well-documented efforts to

prevent the 9/11 attacks, given the foreknowledge provided by Vreeland.

Vreeland had been arrested in Toronto on December 6th, 2000, on fraud charges. He was immediately put in solitary confinement, and remained there until January 15th. This illegal treatment was apparently administered because Toronto police had difficulty ascertaining his identity. In May, the US requested Vreeland's extradition for credit card fraud. What happened in the five intervening months? At this point, he hired Slansky and Galati. In June, he informed his counsel that he had information relevant to the national security of Canada and the US. Over the next few months Slansky and Galati made several requests to various intelligence agencies that they interview their client, without success. In August, the note predicting 9/11 was produced, although it was allegedly sealed and not opened until September 14th. After Vreeland was released from prison in 2002, Alex Jones, who competes with David Icke for world's most obvious intel plant, interviewed him on air.

This is all incredibly suspicious, and reads like yet another show trial staged by intelligence. It includes such theatre as Galati having a dead cat hung on his porch as a threat. Why was Galati defending what was apparently, at the time, a small-time fraudster? Throughout the story, Vreeland is constantly trying to contact CSIS, the RCMP, and every other spook agency he could name. The book by Ruppert is also selling the narrative that US intelligence was warned of the impending 9/11 attacks but chose to do nothing. This is misdirection, since we now know that no planes hit the towers on 9/11. To wrap it up, in 2008 Vreeland was sentenced to 336 years in prison for sexual exploitation of children and distribution of cocaine.

Next, Galati served as a lawyer for Abdurahman Khadr of the Khadr family of spooks. Abdurahman's father, Ahmed Khadr, was a known financier for Al-Qaeda. At one point in 1998, the Khadr family was living with Osama bin Laden in a compound outside Jalalabad, Afghanistan. Later, Abduraman claimed to be an informant for the CIA. So having Galati represent him in 2002 is quite telling.

In 2006, he represented Ahmad Mustafa Ghany, who was a suspect in the 2006 Ontario terrorism plot. On June second, 2006, raids around the GTA resulted in the arrest of 18 suspected terrorists, dubbed the 'Toronto 18'. **Here we have immediate numerology, since 18, also called *Chai* in Hebrew, or aces & eights, is a**

common numerological marker in hoax events. The numbers 33 (the highest rank in freemasonry) and 47 are used similarly. Although the suspects were allegedly planning a series of bombings, armed invasions of government buildings, and even to behead the Prime Minister, nothing was carried out. The group had been under surveillance by CSIS (Canadian Security Intelligence Service) since 2004. On November 27, 2005, intelligence agent Mubin Shaikh began to infiltrate the group. Mubin has worked as an expert witness for the UN security council, NATO, and the Department of Homeland security, and given many interviews on terrorism for CBC, CNN and other mainstream propaganda outlets. So the group was infiltrated not by just any intelligence operative, but by a major spook with international connections.

In 2011, Galati represented the Committee on Monetary and Economic Reform (COMER) in a case against the government of Canada. In it, they argued to restore the Bank of Canada as a lender to the government, and that it is mandated to provide debt-free financing to public works undertaken by the government. **COMER was founded by William Krehm and John Hotson in the 1980's. Krehm was a Russian Jew who grew up in Toronto. In 1932, 2 years after graduating high school, he became a Trotskyist after being recruited by a fellow Russian Jew, Albert Glotzer.** Krehm joined the Canadian branch of the Communist League of America (CLA), which is given nine different names on Wikipedia, including the League for Socialist Action, the Revolutionary Worker's Party, and The Club. One wonders why they needed so many different aliases. **We know that Communism was a Jewish movement (remember, Trotsky's real name was Lev Bronstein) invented to misdirect dissidents around the time of the 1848 republican revolutions in Europe, and to see the Trotskyist movement in Canada** undergoing so many splits and rebrandings during the 1930's indicates it was still accomplishing the same objective. Workers could be diverted from any meaningful action by following the cavalcade of socialist organizations and debating which one was best representing their interests. The same thing still happens now in contemporary politics, without workers realizing that NONE of the political parties represent their interests.

Krehm's Trotskyist faction was opposed to that of Maurice Spector, Jewish, who was one the of the founding members of the CLA. Krehm's affiliation with the organization was sporadic, and he eventually moved to Montreal to lead the party branch there. Interesting that someone who was dropping in an out of the organization was able to later acquire a leadership position. In 1934

he split from the CLA permanently, and with the American B. J. Field (born Max Gould; Gould is a common Jewish name) founded a new worker's party, this time with a 5-letter acronym, which later morphed into a different 4-letter acronym. I don't consider the names important, seeing as they seemed to change on a monthly basis, but they were known as the Fieldites, after the assumed name of Gould. Krehm became the leader of the Canadian Fieldites, and edited their *Worker's Choice* newspaper.

In 1936 he was off to Europe, representing the Fieldites as a delegate at a conference held by the International Revolutionary Marxist Center in Brussels that year. He bounced back and forth between Belgium and Spain, before going to Paris and then London. While in London he spent Christmas with prominent Irish communist Charles Donnelly. He then returned to Spain, where he joined the Partido Obrero de Unificación Marxista (POUM, in English the Workers' Party of Marxist Unification) as a propagandist and translator during the Spanish Civil War. It's not clear how Krehm was able to afford his travels across Europe, seeing as professional revolutionary is not a well paid job. Wikipedia isn't even sure if he graduated from the University of Toronto, or if he dropped out after two years for lack of funds. This is a common theme with the biographies of children of the elite families, who pretend to be working class, but are somehow able to journey all over Europe, holding audiences with prominent people. For one example, see Mark Twain.

While in Barcelona Krehm met spook George Orwell and would converse with him in cafes. Orwell later related his experiences in Spain in *Homage to Catalonia*. For more on Orwell, see here, page 16. POUM was outlawed by the Spanish government in June 1937, and Krehm's house was raided by the secret police. He was detained on suspicion of being a spy, and allegedly held for 3 months, before being hospitalized following a hunger strike and subsequently being released. Whether or not that actually happened, we can be sure he was a spy. He was released on the French border, and returned to Canada, where he began giving speeches about his experiences in Spain.

Krehm has a long list of spook bona fides, and finding him founding COMER should give us grave doubts about the sincerity of their mission. COMER circulates a newsletter where they republish articles from limited hangouts like the Center for Research on Globalization (globalresearch.ca). Just so you know, the CRG was founded by Michel Chossudovsky, Jewish. The *Jewish Tribune*, a newspaper founded by B'nai Brith Canada

(now out of publication) described CRG as “rife with anti-Jewish conspiracy theory and Holocaust denial.” So to find CRG being founded by a Jew and being reprinted by the Jewish-run COMER makes no sense under a conventional interpretation. In fact, it is another example of Jews creating their own opposition, in the tradition of Karl Marx, Ezra Pound, and Hitler.

It is clear that Galati has made a career out of representing intelligence assets and spook economic institutions. He has been set up as a white hat, first trying to prevent 9/11, then trying to restore interest-free lending for government projects. But notice, was he successful in either of those endeavours? The question then remains, why would Galati file this suit if he is controlling the opposition? The answer is that it gives false hope to those who are opposed to medical fascism that there are authentic and intelligent voices representing their interests. If even one person who was planning on filing suit decides to not do so in light of Galati's lawsuit, the project will have been successful. Besides reducing the perceived urgency for others to sue for violations of civil liberties, having the upcoming legal battle managed from both sides allows the elites to script the trial in any way they want. Any outcome can be manufactured, and entered into case law, based on the actions taken and arguments raised by the lawyers and judges. If Galati is unsuccessful in his suit, and I predict that that is the plan, then that will be a blow to anyone else pursuing similar cases. The solution is to not wait for Rocco Galati to ride in on a white stallion to save us, but to file our own lawsuits en masse and force the government to answer for its unconstitutional actions.

[In the future I will be updating this article with more research on the Khadr family, including Omar Khadr, the Toronto 18, and the Canadian Infrastructure Bank, which was created in response to the COMER lawsuit]

41. All of the above constituted false, malicious, and defamatory statements which tended to lower the esteem of the Plaintiff in the fair and reasonable minds of the public. It further constitutes rabid anti-semitism and hate-speech.
42. On August 31st, 2021, the Defendants continued their harassing, untrue, defamatory, malicious targeting of the Plaintiff, and his clientele, by publishing an online article

authored by “Ronnie” entitled: “**Action4Canada Statement Of Claim Fatally Defective, Will Never Make It To Trial**”, which stated as follows:

Action4Canada and several others recently filed a Statement of Claim (or SoC) against the B.C. Government, BCPHO Bonnie Henry, Premier John Horgan, Health Minister Adrian Dix, Solicitor General and Public Safety Minister Mike Farnworth, and several others. The Plaintiffs are being represented by Rocco Galati and Lawrence Wong.

While this should be cause for excitement, that is not the case here. **The SOC is filled with obvious defects which will lead to it getting thrown out, if the Government ever decides to challenge it.**

Just looking at Rules 3-1 and 3-7 of the British Columbia Supreme Court Civil Rules, it already becomes clear that there will be issues with the pleading. These aren’t minor problems, but ones that seriously and repeatedly violate basic rules of the B.C. Supreme Court.

And no, this isn’t “infighting”. It’s difficult to believe that “Canada’s top constitutional lawyer” could draft such garbage unless it was done intentionally. People are being asked to donate to a case that doesn’t stand a chance in hell of going ahead. And maybe that was the point all along.

To begin the critique, let’s first look at a few parts of the Rules Of Civil Procedure for B.C. Although not identical to Ontario, they are quite similar, and set up much the same way. And Lawrence Wong is a lawyer in B.C., so presumably he’s familiar with how things are done in that Province.

For reference, B.C. provides a template for such documents. This is done for all forms, in all Courts across Canada. Just fill out the appropriate sections.

- Part 1: Statement of Facts
- Part 2: Relief Sought
- Part 3: Legal Basis

Rule 3-1 — Notice of Civil Claim

Notice of civil claim

(1) To start a proceeding under this Part, a person must file a notice of civil claim in Form 1.

Contents of notice of civil claim

- (2) A notice of civil claim must do the following:
- (a) set out a concise statement of the material facts giving rise to the claim;
 - (b) set out the relief sought by the plaintiff against each named defendant;
 - (c) set out a concise summary of the legal basis for the relief sought;
 - (d) set out the proposed place of trial;
 - (e) if the plaintiff sues or a defendant is sued in a representative capacity, show in what capacity the plaintiff sues or the defendant is sued;
 - (f) provide the data collection information required in the appendix to the form;
 - (g) otherwise comply with Rule 3-7.

Rule 3-7 is quite long, but here are some of the more relevant portions which apply to this Statement of Claim. The reasons will soon become obvious.

Rule 3-7 — Pleadings Generally

Content of Pleadings

Pleading must not contain evidence

- (1) A pleading must not contain the evidence by which the facts alleged in it are to be proved.

Documents and conversations

- (2) The effect of any document or the purport of any conversation referred to in a pleading, if material, must be stated briefly and the precise words of the documents or conversation must not be stated, except insofar as those words are themselves material.

When presumed facts need not be pleaded

- (3) A party need not plead a fact if
- (a) the fact is presumed by law to be true, or
 - (b) the burden of disproving the fact lies on the other party.

Assuming that this SoC doesn't just sit indefinitely, like both with Vaccine Choice Canada are, it's most likely to be struck when challenged. Rule 9-5 lays out how and why Pleadings are thrown out. Going through the SoC, it becomes clear it could happen for many reasons.

Rule 9-5 — Striking Pleadings

Scandalous, frivolous or vexatious matters

(1) At any stage of a proceeding, the court may order to be struck out or amended the whole or any part of a pleading, petition or other document on the ground that

(a) it discloses no reasonable claim or defence, as the case may be,

(b) it is unnecessary, scandalous, frivolous or vexatious,

(c) it may prejudice, embarrass or delay the fair trial or hearing of the proceeding, or

(d) it is otherwise an abuse of the process of the court,

and the court may pronounce judgment or order the proceeding to be stayed or dismissed and may order the costs of the application to be paid as special costs.

[am. B.C. Reg. 119/2010, Sch. A, s. 22.]

Admissibility of evidence

(2) No evidence is admissible on an application under subrule (1) (a).

Now, let's address specific criticisms of the SoC.

1. No Concise Set Of Material Facts Provided In Statement Of Claim

Rule 3-1(2)(a) says that a Claim should have a concise set of material facts. This does not. Instead, this is a rambling, redundant, horribly repetitive monster that should have been gutted a long time ago. 391 pages was not needed, as this could have been done in a fraction of that. The SoC — if ever challenged — is likely to be struck because of the exceptionally poor writing alone.

Paragraphs in SOC are typically supposed to contain 1 main idea or fact. This makes it easy for the other side to simply “admit” or “deny”. But throughout this, many are crammed full of other information, which complicates things.

Moreover, many of the allegations are things that each Defendant could claim they had no knowledge of. And there are plenty of bald assertions, without underlying facts being pleaded.

2. Section On Relief Sought Is A Complete Mess

Rule 3-1(2)(b) states that a Claim shall “set out the relief sought by the plaintiff against each named defendant”. In this filing, that section starts at page 312, and ends at 356. Yes, it takes 44 pages to outline what is being asked for in the Claim. It’s incredibly redundant and repetitive.

At page 341, we finally get to monetary damages.

- \$1,000,000: Action4Canada
- \$2,000,000: Kimberly Woolman
- \$2,000,000: Estate of Jaqueline Woolman
- \$200,000: Brian Edgar
- \$200,000: Amy Muranetz
- \$2,000,000: Jane Doe #2
- \$2,000,000: Valerie Ann Foley
- \$250,000: Linda Morken
- \$250,000: Gary Morken
- \$500,000: Pastor Randy Beatty
- \$500,000: Ilona Zink
- \$750,000: Federico Fuoco
- \$750,000: Fire Productions Limited, and F2 productions Incorporated
- \$250,000: Michael Martinz
- \$250,000: Makhan S. Parhar
- \$750,000: North Delta Real Yoga Real Hot Yoga Limited
- \$250,000: Melissa Anne Neubauer
- \$750,000: Jane Doe #3

\$14.65 million (if this is added up correctly), is the amount being sought by individuals and organizations. But there is more to this. Although some private parties are named, it’s unclear who exactly is supposed to be paying these people the Charter damages they seek. A number of Government Officials are named. It seems that the Judge would just be expected to figure it out for himself.

On page 355, it is stated that \$20 million is sought against CBC. However, it’s not clear who would get it. Would the Plaintiffs share it, or is that the lawyer fees?

\$14.65 million for the Plaintiffs, and \$20 million for who exactly?

3. No Concise Summary Of The Legal Basis For Claim

Rule 3-1(2)(c) requires that the SoC “set out a concise summary of the legal basis for the relief sought”. The legal basis starts on page 356, and ends at page 384. Obviously, this is far from being concise. But beyond that, the SoC isn’t really stating a legal basis. Instead, it mostly rehashes the declaratory relief sought in Part 2 of the SoC. It looks like it was just a cut-and-paste job, done without anyone checking to see if it made sense.

What SHOULD have been include was a list of the various laws and statutes that would be relied on at Trial. If necessary, the relevant parts can be quoted. Instead of that, Part 3 just goes through the same demands made earlier.

At times, it also appears that conclusions are being drawn, when it should just be stating the law.

4. Evidence Being Pleaded In Statement Of Claim

Rule 3-7(1) explains that an SoC should not plead evidence. Nonetheless, this document spends a lot of time pleading just that This isn’t supposed to happen at this stage. The SoC should outline the facts that the Plaintiff(s) are trying to establish.

Additionally, the bulk of the evidence cited wouldn’t be allowed in even if it were okay to include here. Going through the SoC, a good chunk of the citations are media articles. That may be fine for research, or for other publication, but Courts do have a higher standard.

5. Long Quotes Listed In Statement Of Claim

Rule 3-7(2) tell us that: “The effect of any document or the purport of any conversation referred to in a pleading, if material, must be stated briefly and the precise words of the documents or conversation must not be stated, except insofar as those words are themselves material.” Throughout the SoC there are very long quotes of conversations and documents. Sure, references are fine, and short bits of text, but entire paragraphs are devoted to this purpose.

6. Content That Is Unnecessary, Vexatious, Delay Proceedings

Rule 9-5(1) allows for Pleadings to be struck if they contain any of the following elements:

- (b) it is unnecessary, scandalous, frivolous or vexatious,
- (c) it may prejudice, embarrass or delay the fair trial or hearing of the proceeding, or
- (d) it is otherwise an abuse of the process of the court,

Starting at page 188, the SoC goes on and on about Bill Gates, GAVI, the World Economic Forum, Alan Dershowitz, and media collusion. Granted, the bulk of this is completely true. However, unless these people and organizations are either being sued, or called as witnesses, their presence doesn't help. Moreover, it's not just a brief mention, but entire pages.

Are these lawyers unaware that the Defendants are entitled to challenge every statement and allegation made? This is just asking for such a Motion.

7. Proofreading Not Exactly Up To Par

[image]

This is from page 118. Sure, it's very minor in the scheme of things, but shouldn't lawyer fees come with an expectation of proofreading? Jagmeet Singh and Jason Kenney aren't being sued, so why are they even in here? Singh is the head of a 3rd Party Federally, and Kenney is Premier of Alberta.

This last error is more a nuisance than anything. However, the other ones could (by themselves) get the SoC struck if anyone ever challenged it. These are not minor errors or oversights, and are not something that could be cured by Amendment, or a revised Statement.

Also, starting on page 122, Denis Rancourt is listed and discussed as an expert. Considering that he "is" an expert witness is the police case and the schools case, and also a Plaintiff in the July 6, 2020 case, there may be some conflict of interest here. Beginning on page 128, there is the pleading of expert opinion. If they are, or ever became witnesses, this would be more pleading of evidence, in violation of Rule 3-7(1).

And this is nitpicking, but Bonnie Henry co-owns a winery in Keremeos, not Keremios. See page 121.

But hey, at least the service addresses were included this time, so take that as a small victory.

Now, this is a (non expert) look at things, but R. v. Imperial Tobacco Canada Ltd., 2011 SCC 42 (CanLII), [2011] 3 SCR 45 seems to be the standard for

Motions striking out Pleadings. It uses the “plain and obvious” test for making that determination. The SoC violates the Rules in glaringly obvious ways, and there isn’t any real fix possible.

Why draft a Claim this badly? One possible explanation is that this is never intended to go to Trial. See here for background information.

Consider, for example, the July 6, 2020 Claim from Vaccine Choice Canada. It contained the same defects as this. Despite those problems, it has never been challenged by Trudeau, Ford, Tory or anyone else. No default judgement was ever sought either, despite having no response in over a year. The only plausible explanation is collusion, where the parties agreed to leave it in limbo, for whatever reason.

However, donors pump money into these cases, unaware that there is no urgency in bringing them forward. In fact, it doesn’t seem they (the lawyers) ever planned to take any of them to Trial, despite the hype. This diverts money, energy, hope and time into Court challenges designed to go nowhere. By taking on all these cases — and letting them sit — the Great Reset moves ahead relatively unopposed. Not that the people in the comments would notice.

Vladimir Lenin is famously quoted as saying: “The best way to control the opposition is to lead it ourselves”. And that’s exactly what this looks like.

- **Defamation**

43. The Plaintiff states, and the fact is, that the above-cited statements are/were false, and untrue statements, and further, by innuendo, defamatory and caused damage to the Plaintiff in that they tended to lower the esteem and reputation of the Plaintiff in the fair-minded members of the community, which statements were also designed to interfere with the Plaintiff’s contractual obligations and economic interests, for all of which he has suffered, and continues to suffer, considerable financial damages and damage to reputation for the malicious, untruthful, and defamatory statements.

44. These untrue and false statements were malicious, irresponsible, negligent, and uttered with malicious intent, in they attempt to assert and convince the public that the Plaintiff is *inter alia*:

- (a) Violating the rules of conduct of his profession;
- (b) Being immoral;
- (c) Being fraudulent;
- (d) Being a subversive foreigner;
- (e) Taking on cases not to earn a living, but rather for unethical or illegal motives;
- (f) Operating secretly and, by innuendo, of supporting terrorists, or of being a terrorist himself
- (g) “Rigging” his court cases;
- (h) sharing terrorist ideology;
- (i) conning innocent people/clients out of their money;
- (j) Representing his client for subversive motives and not for the public good;
- (k) Being associated with dangerous or illegal organizations;
- (l) Intentionally failing to advance the COVID-19 cases on which he has been retained.

These statements are also saturated as vile anti-semitism, and also alleging that the Plaintiff is a terrorist, mobster, fraud, and controlled opposition.

45. The Defamatory statements were published across multiple platforms and widely circulated by the Defendants. The Defendants’ website, <https://canucklaw.ca/>, at one point, was one of the first google results when typing in the Plaintiff’s, Rocco Galati’s, name into Google.

46. The Defendants did not provide the Plaintiff the opportunity to answer the allegations before publishing the defamatory statements.

47. The Defendants' apology, published December 28th, 2020, maliciously and irresponsibly aggravated the defamation, which evidence of malice is evidence of, *inter alia*, by:

- (a) the explicit racial attacks and slurs, expressly and by innuendo, as well as references to "scum lawyers" and "terrorist lawyers", who are "not real Canadians" but foreigners";
- (b) an "apology" that does not actually retract the false and defamatory allegations made against the Plaintiff, but in fact re-affirms and aggravates those allegations by not retracting them, but rather trying to justify why they were made.
- (c) The unfounded threats to the Plaintiff's counsel in issuing necessary steps under the **Libel and Slander Act** and Common Law.
- (d) By threatening baseless Law Society Complaints, and in fact making them, against counsel for merely representing the Plaintiff.

Two Law Society complaints were made by the Defendant against Mr. Galati and this lawyer. Both were dismissed. A third has been made to which Mr. Galati is responding. The Plaintiff states that this is further evidence of malice and harassment.

- **Online Harassment**

48. The Plaintiff further states that, in addition to defamation, the conduct of the Defendants further constitutes the newly-recognised tort of (online) harassment as delineated by the Ontario Superior Court in **Caplan v Atas 2021 ONSC 670**.

49. The Plaintiff states, and the fact is, that the Defendants have engaged in:

(a) Repeated and serial publications of defamatory material;

(b) Which defamatory material was not only designed and directed at the Plaintiff, but further designed to cause the Plaintiff further distress by targeting persons the Plaintiff cares about, namely his clients and his clients' supporters, so as to cause fear, anxiety and misery;

As set out by the Superior Court in **Caplan v Atas 2021 ONSC 670**, at paragraph 68.

- **Liability Of The Defendants and the Relief Sought**

50. The Plaintiff states that the Defendants are liable to the Plaintiff, for the instances and reasons pleaded above, in libel and slander and in (online) harassment.

51. The Plaintiff therefore seeks the relief set out in paragraph 1 of this statement of claim.

52. The Plaintiff further pleads any and all documents mentioned in this statement of claim as documents referred to in the pleadings herein.

The Plaintiff proposes that this action be tried in Toronto.

Dated at Toronto this 6th day of September 2021



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Lawyer for the Plaintiff

Court File No.:	
Galati Plaintiff	Canuck Law et al Defendants
<div>ONTARIO SUPERIOR COURT OF JUSTICE PROCEEDING COMMENCED AT TORONTO</div> <div>STATEMENT OF CLAIM</div> <div><i>Name:</i> ROCCO GALATI LAW FIRM PROFESSIONAL CORPORATION Samantha Coomara LSUC No.: 75423R <i>Address:</i> 1062 College Street Lower Level Toronto ON M6H 1A9 <i>Telephone No.:</i> 416-530-9684 <i>Fax No.:</i> 416-530-8129 Lawyer for the Plaintiff</div>	