

APPLICATION FEDERAL COURT

BETWEEN:

**Khaliq Hussain Anwar
and**

**Neil Nawaz, Social Security Tribunal of Canada Appeal
Division**

APPLICATION UNDER THE SECTION 18.1 OF THE FEDERAL COURTS ACT (Court seal)

Notice of Application

TO THE RESPONDENT:

A PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the applicant. The relief claimed by the applicant appears below.

THIS APPLICATION will be heard by the Court at a time and place to be fixed by the Judicial Administrator. Unless the Court orders otherwise, the place of hearing will be as requested by the applicant. The applicant requests that this application be heard at Toronto Local Office.

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or a solicitor acting for you must file a notice of appearance in Form 305 prescribed by the [Federal Courts Rules](#) and serve it on the applicant's solicitor or, if the applicant is self-represented, on the applicant, WITHIN 10 DAYS after being served with this notice of application.

Copies of the [Federal Courts Rules](#), information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO OPPOSE THIS APPLICATION, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU.

Oct. 4, 22

Issued by: *(Registry Officer)*

Registry of Toronto Local Office

TO: Tribunal member: Neil Nawaz, Social Security Tribunal of Canada Appeal Division

Application

This is an application for judicial review in respect of Social Security Tribunal of Canada Appeal Division

Decision date: September 14, 2022, File number: AD-22-481, see tribunal decisions, copies attached.

Decision

[1] Leave to appeal is refused. I see no basis for this appeal to go forward.

Overview

[2] The Claimant is a 52-year-old man who has training as a civil engineer in Pakistan. In 2001, he immigrated to Canada and studied and worked here for a number of years. He claims that, in 2007, Canadian authorities, in collusion with foreign intelligence agents, forcibly returned him to Pakistan. He has moved between the two countries several times over the past 15 years and is currently living in Toronto.

[3] In August 2019, the Claimant applied for a Canada Pension Plan (CPP) disability pension. In his application, he explicitly denied that he was suffering from a mental or physical impairment, but he claimed that he could no longer work because he was being persecuted and tortured by Canadian and Pakistani government agencies.

[4] Service Canada refused the application. In its view, the Claimant had not proved that he had a severe and prolonged disability during his coverage periods, which ended respectively on December 31, 2007 and March 31, 2018.¹

[5] The Claimant appealed Service Canada's refusal to the Social Security Tribunal's General Division. The General Division held a hearing by teleconference and dismissed the appeal because the Claimant had not provided any medical records relating to his coverage period. The General Division acknowledged that the Claimant might be disabled now but found no evidence that he was incapable of substantially gainful employment in 2007–08.

[6] The Claimant now comes to the Tribunal's Appeal Division asking for permission to appeal. He disagrees with the General Division's decision and maintains that his disability application has always been about seeking compensation for injuries inflicted upon him by the Canadian Security and Intelligence Service (CSIS). He says that the General Division made the following errors:

- It did not compel CSIS to respond his allegations of surveillance, torture and harassment and, as a result, made him sound paranoid;
- It failed to address his testimony that his health was seriously damaged as a result of microwave radiation that CSIS directed into his home;
- It ignored three medical reports showing that he suffers from disabling mental and physical symptoms caused by the Canadian government's actions;
- It ignored the fact that the government forcibly removed him from Canada multiple times starting in 2007, thereby preventing him from compiling a medical record or from making further contributions to the CPP;
- It failed to address the breach of his equality rights under the Canadian Charter of Rights and Freedoms (Charter); and
- It displayed bias and systematically favoured the Canadian government's case over his own.

Issue

[7] There are four grounds of appeal to the Appeal Division. A claimant must show that the General Division

- proceeded in a way that was unfair;
- acted beyond its powers or refused to exercise those powers;
- interpreted the law incorrectly; or
- based its decision on an important error of fact.²

[8] An appeal can proceed only if the Appeal Division first grants leave, or permission, to appeal.³ At this stage, the Appeal Division must be satisfied that the appeal has a reasonable chance of success.⁴ This is a fairly easy test to meet, and it means that a claimant must present at least one arguable case.⁵

[9] My job is to decide whether the Claimant has raised an arguable case that falls under one or more of the permitted grounds of appeal.

Analysis

[10] I have reviewed the Claimant's reasons for appealing, as well as the evidence that was available to the General Division. It is clear that the Claimant has endured hardship of one kind or another over the years. However, based on the available facts and applicable law, I don't see how the Claimant has an arguable case that the General Division erred in coming to its decision.

[11] The CPP is not an all-purpose tool for correcting wrongs that the government may have committed. It is a contributory insurance plan that provides a measure of compensation for lost income. Claimants for the CPP disability pension must prove they have impairments that make them regularly incapable of substantially gainful employment. They must also show that those impairments occurred during their coverage periods and have persisted ever since.

[12] The difficulty for the Claimant is that his coverage periods ended many years ago. He has provided medical records going back to July 2018 but none earlier.⁶ The treatment providers whose reports are on file did not start seeing the Claimant until long after his coverage ended. They would have had no direct knowledge of his condition during the relevant periods.

[13] As the General Division rightly recognized, a claimant's testimony by itself is not enough to prove disability. A claimant must also provide at least some

medical evidence that they were disabled during their coverage periods.⁷ In this case, none of the Claimant's reports addressed his condition before March 31, 2008. For this reason, I don't see how the General Division erred in dismissing the Claimant's appeal for lack of evidence.

[14] As for the Claimant's other allegations, I don't see arguable cases for them either:

- The Claimant argues that the General Division should have forced government officials to account for their actions, but that is not how this Tribunal works. CPP claimants bear the burden of proving that they are entitled to benefits.⁸ In this case, it was up to the Claimant to show that he was incapable of work; by contrast, neither the Minister nor the General Division were required to prove or disprove anything.

- The Claimant says that the General Division disregarded evidence that the Minister discriminated against him. However, the General Division specifically offered the Claimant an opportunity explain in detail how the Minister violated his section 15 Charter rights.⁹ The Claimant declined to take that opportunity. The Claimant also alleges that General Division itself breached the Charter, although he did not specify how.

- The Claimant insists that the General Division displayed bias against him. However, he has not offered anything to substantiate this allegation other than the fact that the General Division disagreed with him. That is not enough. Bias suggests a state of mind that is predisposed to a particular result. The threshold for a finding of bias is high, and the burden of establishing bias lies with the party alleging its existence.¹⁰ More than just suspicion is needed to support a case for bias.

Conclusion

[15] The Claimant has not identified any grounds of appeal that would have a reasonable chance of success on appeal. Thus, permission to appeal is refused.

The applicant makes application for:

The tribunal did not consider the following issues covered by the settlement conference, their decision did not address these issues included in this settlement conference and made a speculative decision, in practice no decision is made and the GD decision is

rubber stamped. He had omitted facts and trivialized my health conditions so much so that I pointed out all these allegations in my application to the AD about GD tribunal member as his decision could not give the AD decision maker a true picture of my health and capability to perform everyday tasks and the AD tribunal member used his decision as statement of facts and made a decision using just the GD decision, incorrect details are input, important points omitted, and assumptions are made about a claimant's condition. It is not an independent decision to decide about benefits not considering other sources of information or evidence because settlement conference tribunal member proved her independence by taking a different view from the GD decision.

Her views at the settlement conference as follows:

1. Might the Claimant have met the requirement for some medical evidence of a severe disability on or before the end of his minimum qualifying period (MQP) in GD2-260 and following? The Claimant does not agree with the diagnosis in this report. However, the document does describe the Claimant's experiences starting in 2007 at college in which he started to experience harassment and persecution that was bad enough that he felt forced to leave the college. The harassment continued in the streets of Toronto and in his home to the point where he could no longer be in public. He lost three jobs in a row in Pakistan and could not sleep or concentrate and his activities like eating and sleeping were disrupted.
2. Although the diagnoses are different, the parties may wish to consider whether the Claimant's post-MQP evidence is similar in content and nature to DM v Minister of Employment and Social Development 2020 SST 997 and 2020 SST 1071.

At settlement conference my appeal was settled based on medical evidence of psychiatrist dr. Choi reported that my condition was present since 2007 to date and hindered me from gaining employment and accessing medical services and medical documentation, case of DM v Minister of Employment and Social Development 2020 SST 997 and 2020 SST 1071, Federal Court principles on the disability pension test, and my personal circumstances so I am entitled to disability benefits, please allow payment. See the attached Notice of Settlement Conference by Teleconference issued by the tribunal. But the other party the minister disagreed with it as a result it was not made part of the final decision issued by the tribunal refusing my application adopting and sharing statements of GD decision, copies attached.

My post-MQP evidence is similar in content and nature to DM v Minister of Employment and Social Development 2020 SST 997 and 2020 SST 1071.

Please remove this speculation, bias and make a decision in accordance with the recommendation given in this settlement conference and allow my disability appeal. I have proved I have a severe and prolonged disability per the following grounds and allow the payments.

The minister and the tribunal find that I am disable now based on the information in my records including the three medical evidence, my own evidence, csis letter covering my investigation under the exempt bank ppu045 that is occurring continuously from 2007 to date in two countries Canada and Pakistan nonstop on daily basis 24/7, privacy letter (an email from privacy office) that included a written statement of exempt bank ppu045 treatment, my education, training, and experience, all these evidence establish that my physical and mental impairments are severe but they are not paying benefits.

The minister already accepted my disability now because I cannot work continuing for the last 16 years from 2007 to date due to severe physical and mental impairments caused by electronic aggression and harassment, see their decisions and now this new evidence above also prove past disability, the tribunal is not correctly applying this evidence because I am Canadian citizen and I was unlawfully removed from Canada against my will without court order, consent, no charges against me , in just one year from Feb. 2007 to April 2008 I was removed 5 times from Canada to Pakistan and vice versa and this new evidence described all the circumstances beyond my control existed at that time in 2007 and 2008 itself sufficient to prevent the person from undertaking a medical evidence or from doing any work during this time period, see my removal record at page GD15-4, this was not my fault , it was the fault of the Canadian government agency csis brought about the inability to work, I was not in Canada , medical evidence can only be made if I was in Canada , the tribunal was satisfied at the settlement conference that in those circumstances it would be unreasonable to expect the person to meet the medical evidence requirements for that period, this disability is continued from 2007 to date , they accepted my disability now but did not accept in 2007/2008 so please approve my disability benefits by using contribution in 2008.

The tribunal did not do the assessment and did not make it clear, in its reasoning, that it had considered circumstances beyond my control, they did not make detailed enquiry as to the nature of my particular circumstances during the course of the time period from 2007 to date hence unfair and unjust decision again.

The origin of this ongoing government agency csis's removals, harassment, and electronic torture is not in 2018 when I filed my application for the disability benefits because there is no such a retaliatory motive happened in 2018 which could have caused this problem but there is a direct evidence of a retaliatory motive occurred in 2007 that is my opposition to white people in Seneca college as shown by my written

statement given to college administration about their abuses inside college and from this retaliation motive all the other series of events happened including unlawful removals, harassment, and electronic torture by csis starting from 2007 to date continuing nonstop for the last 16 years in two countries Canada and Pakistan so that is when the origin of this disability started continuing to date and if it is accepted now then it must also be accepted in 2007 so that my contribution in 2008 should be extended to pay this disability benefits. This argument is the merit of the case so application for benefits must be approved. I was a former student at Seneca College from 2004 to 2007 and could not complete my study due to this unlawful removal and harassment from this college by csis in 2007. They deprived me of due process; right to access the authorities as a result could not get earlier medical evidence and discriminated against me because of my background subjected to this persecution and torture campaign in two countries unlawfully.

Tribunal member altered my testimony by saying that I am seeking compensation not disability benefits, that csis did not come to the hearing that made me paranoid, and that various government agencies and public institutions in Canada and Pakistan are behind my torture and persecution, he all did it to discredit evidence of the electronic aggression and to imply the tactic of discrediting my case by making up false statements. I always testified that my application is about disability benefits, that the Canadian government must be made a party to the hearing if my rights are adversely affected by the decision, and tribunal refused to notify the person to appear at the hearing and to present evidence to decide the case, and that the tribunal intentionally confused the situation to mislead us by increasing the complexity of the story significantly to make my case sound paranoid and promoting misunderstanding about my testimony as if all the agencies are involved in my harassment as a result people will not believe my testimony and will not care about it instead of keeping it simple statement making only csis responsible for this unlawful action on me because in this way people would think that csis is not conducting this kind of torture and harassment and removals. This misdirection is enough for people not to believe it is occurring.

This is the truth I presented in my testimony clearly that the evil agency csis is subjecting me to electronic surveillance, tracking, torture and harassment, see their letter ppu045 exempt bank investigation neither denying nor releasing my personal information being kept under this bank, csis never opposed that these technologies and harassment are being used against me as a retaliation against me, csis never charged me for false reporting or that I am committing perjury to blame csis for it, csis never opposed rather refers to police, nsira, see letters. His decision letter conceals from the public the harmful use of directed radiation for domestic surveillance programs. My application is always against the Canadian government agency csis officials seeking benefits for the injuries caused by the retaliation.

You are requested to grant my appeal based on these errors by not explaining why this medical evidence report dated after this first MQP was not considered as medical evidence, by failing to provide reasons for why it did not give weight to the psychiatrist medical health's opinion about my medical condition?

The grounds for the application are:

This recent medical evidence to support what my functional limitations were back at the time of the MQP.

I experienced a situation in which the very reason I lacked medical evidence from the relevant time period is due to the nature of the disability itself. My disability made it difficult for me to access medical care. I have recent medical evidence to support what my functional limitations were back at the time of the MQP. Those functional limitations were significant. That evidence (in addition to my own testimony about my limitations during the MQP) is sufficient to show that my disability was both severe and prolonged within the meaning of the CPP. I am satisfied that I established that I have been incapable regularly of pursuing any substantially gainful occupation since the end of my MQP.

The evidence from the psychiatrist helps to explain why there are no medical reports from around the time of the MQP – due to this condition could not get Dr Report

These evidence support that I could not function, work due to this ongoing disability, affected my ability to work by March 31, 2008

This medical evidence I provide relates to my condition in 2008 or earlier.

That I had a severe and prolonged disability by March 31, 2008.

My own evidence explain that I was totally removed from Canada from 2007 to date is a proof at the end of MQP meeting the definition of a severe disability by March 2008

I have provided the necessary medical and other evidence upon which the minister has accepted my disability. I have my both past professional work experience and odd jobs experience in Canada and I have proved that I am no longer have the functional capacity to perform my both past professional and odd work prevented by the impairments caused by the unlawful actions of the Canadian government agency csis on me then the burden shifts to the tribunal and the minister to provide evidence that demonstrates that I was not disable in 2007/2008 given my incapacity, age, education,

and work experience. I was not allowed to do any type of work in employment in Canada from 2007 to date for income, contributions, how can I make contributions under such circumstances beyond my control, I am under disability throughout this period from 2007 to date as confirmed by the current ongoing disability agreed by the minister so my contributions from 2008 must be used to pay benefits because my current disability has been accepted by the minister and the tribunal after 2008 contributions.

It is not reasonable to conclude that I have not proven my case, particularly in light of the challenges I had in accessing medical care from doctors inside Canada given the nature of the disability itself.

The tribunal's decisions did not consider my psychiatry medical evidence that speaks to when my health condition likely made me incapable regularly of any substantially gainful occupation, the evidence from the psychiatrist provided detailed information about my situation/ diagnosis, including its onset, limitations, injuries, and case history.

I mentioned all the errors in my application AD01 - Request for Leave to Appeal, copy attached.

The tribunal made an error by concluding that I did not prove that my condition was severe on or before the end of his MQP.

Tribunal member had displayed a deep-seated favoritism and deep-seated biased while hearing a case against csis using directed electromagnetic surveillance on me subjecting to csis's malicious aggression has caused severe physical and mental harm to me.

During the hearing against the Canadian government agency csis , he ignored conclusive evidence of the Seneca college's abuses activities within the college , ignored conclusive evidence of Seneca college's incomplete diploma, refused to call csis's counsel on the matter at the hearing, dismissed the case states the unlawful actions of the Canadian government agency csis in college, in Canada and in Pakistan, dismissed the case without considering evidence of my inability to get medical report and inability to make contributions from 2007 to date, falsely mentioned that unclear work history, struck from the decision evidence of my injuries caused by the csis and by isi after my unlawful removal to Pakistan.

I filed my application for seeking benefits not filed for taking action against perpetrator government but seeking verification of the facts on my record to compel the csis counsel to give testimony before him how this has affected my daily life, sufferings when I am exposed to electromagnetic radiation inside my home, outside my home, verify and produce documents under the exempt bank ppu045 investigation being carried out by csis on me using directed electromagnetic surveillance on me subjecting to csis's malicious aggression has caused severe physical and mental harm to me on the ground that csis's investigation of my activities is retaliation for bringing claims of racial discrimination against Seneca college.

My application to the appeal division indicates that misconduct of tribunal member has helped perpetrator of hate crimes and electronic aggressions as evidenced by my application to the AD make possible that constitutional violations continue unaddressed and undeterred, my application is asking AD to verify and consider whether he has displayed a deep-seated-favoritism to corruption and deep-seated-antagonism to victim of constitutional violations.

Because tribunal misconduct is detrimental to the public at large, my application will help to prevent this aggression to our constitutional rights which is continuing unaddressed and undeterred.

I brought to his attention an issue of additional evidence, my situation raising allegations of torture, harassment, removals, satellite technology being used on me, against the Canadian government agency csis at the hearing to fully evaluate the issue. He is unable to resolve this additional evidence issue; he did not raise the issue directly to csis counsel to discuss this unlawful actions of removals, harassment, and electronic torture by the csis against me. He did not consult with the court regarding the court order issued for this ongoing exempt bank ppu045 investigation by the csis on me.

He abused his discretion by making false statements and without any rational basis, without any evidence to support his actions and conclusions, he dismissed my case not justified under the particular circumstances of the case such as he failed to conduct a full and fair hearing by refusing to allow the Canadian government agency csis counsel to testify who have information related to my situation, failure to have the csis submit the evidence under exempt bank ppu045 investigation being carried out by csis that will verify my claim, his actions are biased with respect to my claim because my claim is based on government unlawful actions on me and show prejudiced toward government victims subject to the harmful use of directed radiation for domestic surveillance programs and his decision is also affecting public interest who are suffering these

abuses at the hands of this agency csis as I pointed out these allegations in my application to the AD.

I also demanded verification from the government, issuing subpoena, calling them to speak about it, production of documents under ppu045, court order, no charges, no due process, no consent, and exempt bank ppu045 secret investigation by csis. He erred by finding that he has no right to get testimony and my documents from csis because Canadian law provides him with such a right. He erred by not issuing subpoena counsel for the csis. He abused his discretion by failing to call them.

This is repression agency working on behalf of white people in this country to take revenge from their opponents because they are empowered by this technology/methods so very easily they start torturing us destroying our life without any oversight, accountability of criminal agency, leaders, they all know about it but not stopping it rather enjoying our misery, not releasing personal information kept under this bank, csis never opposed that these technologies and harassment are being used against me as a retaliate against me who denounce injustice , csis/police never charged me for false reporting or that I am committing perjury to blame csis for it, csis never opposed rather refers to police/nsira, see other letters and reports, incomplete study in Canada.

Both are government agencies, one is torturing and the other is denying benefits, not verifying from them, only busy denying benefits.

Saving the government funds, have resources to prolong this appeal but I do not have these government resources as a result they are denying benefits unfairly and brought it to this judicial review level because they know my critical situation, cannot handle this court process, tribunal process and will be finally winner saving the government funds wrongly.

Look my previous life, no problem at all, excellent engineer but in Canada I got this hidden problem without any due process, got ruined, I came here for life not for creating or facing these corrupt government problems, they committed two crimes one in college, creating bad environment inside college provoked me into this opposition and 2nd crime this government electronic torture and harassment in two countries, no charges, not a criminal, not a terrorist rather they are criminals/terrorist.

I have established that I was disable before this current ongoing disability agreed by the minister and for resolution I have also established that I have done good faith efforts to

obtain evidence from csis then the burden of proof shifts to the tribunal and the minister to obtain evidence from them.

I have contribution in 2008 and after 2008 I was not allowed to have earnings and contribution in Canada due to the Canadian government fault not my fault , they removed me unlawfully many times from Canada subjected to harassment and torture that deprived me of my work , earnings, and contribution in Canada from 2008 to date , see my tax return record from CRA so in this case my contribution from 2008 must be used to provide benefits which has been determined by the cpp department in their GD2, they destroyed this income and contribution for this whole period from 2008 to date, not due to me, due to their unlawful actions, why I am being penalized for it, they should be penalized, I also suffered expenditures for their actions in two countries Canada and Pakistan needed during this period without any income in Canada . Since my disability status has been determined by the minister for the current period due to my current ongoing situation when I filed my application for benefits starting from 2018 to date. How can I make earlier medical evidence when I was unlawfully removed from Canada in 2007/2008, see removal record. I made the medical evidence when I was not removed from Canada in 2018 to date so under such disabled circumstances benefits must be paid. If I was not removed and was allowed to live in Canada in 2008 and would not have made medical evidence then I am responsible for it but I was not living in Canada, was living in Pakistan so satisfy the criteria due to this unlawful removal prevented me from having this medical evidence.

I establish my disability of electronic torture and is accepted by the minister and the tribunal member and this determination should be used to decide disability in 2007/2008 to use the contributions from 2008 for receiving disability benefits under the CPP Act. I was denied benefits because I did not have earlier medical evidence not because of my continuing disability as proved by my current disability agreed by them based on the current medical report. They erred by denying benefits because I was deprived of due process at my unlawful removal from Canada in 2007/2008 therefore is unavailable and destroyed all my constitutionally protected interests of work, income, contributions, residence, function and earlier medical report in Canada from 2007 to date continuing nonstop . CPP Act provides benefits under such circumstances beyond my control based on this destruction of my constitutionally protect interest.

If I have this physical and mental impairment caused by the unlawful actions of the Canadian government agency csis and later on combined with electronic torture in two countries Canada and Pakistan for the last 16 years from 2007 to date prevented me from having this earlier medical evidence and contributions then you will find that such impairment is good cause for not having medical evidence and contributions during all these years in Canada.

The existence of an unlawful removals, harassment and torture by the Canadian government agency csis provide good cause for my failure to follow to doctor to get medical evidence in 2007/2008, it was beyond my control.

CPP law and regulations provide that a claimant will be found disable if he fails with good cause to go to doctor to get medical evidence that can document this inability to function and work inside Canada at that time in 2007/2008. The law and regulations provide that you will consider a claimant's physical and mental limitations, among other things, when determining if the claimant has good cause for not following medical evidence procedure , the existence of my incapacity causing the individual to be unable to understand the consequences of failing to follow the procedure provide good cause in my case where the evidence shows that the claimant has unlawful removals, harassment, and torture actions by the csis with symptoms including a highly organized stalking and harassment tactics system that leads my 05 times removal from Canada in just one year from Feb. 2007 to April 2008, see my removal record.

I proved my unlawful removals from Canada by giving you removal timeline because such quick removals in a very short period of time cannot happen in accordance with Citizen and Immigration Act and Regulations; no order was issued by the any Canadian government department showing that I would be removed. It was all against my wishes and prevented me from lawful residence status, work status in Canada under the Act.

By explaining why and how my unlawful removals happened without the knowledge and permission of the Canadian and Immigration department , in fact no government department issued any letter ordering my continuing removals since 2007 to date , see the timeline but this the practice of this criminal government agency csis not to follow the law of the land and removed me like that without any charges against me, no due process followed , no court order was issued, no consent from me establishing the proof that from all the facts and circumstances in my case it appears that this government agency csis is not permitting me to reside and work in Canada, this is the proof establishing this removal and continuous disruption to my life , I was not allowed to live in Canada denied the opportunity to get medical report, to make contributions in Canada.

Tribunal cannot make decisions without verifying my information and status with the Canadian government public safety and immigration departments following their rules contained in the law and the law allows eligibility for my case if the Canadian government committed a felony since 2007 as a result I am eligible for disability benefits because all my impairments are related to their commission of the felony and these impairments are happening in both countries Canada and Pakistan for the last 16 years and continuing, not stopping for exposing and denouncing abuses of the students in

Seneca college in 2007, see the list of abuses, without any due process, court order, no charges against me, no consent from me.

I gave the tribunal all the information and documents listed in my application to prove whether my case is valid in 2007/2008 and the minister is agreed with my current disability meeting all other eligibility requirements. The tribunal must contact the government agency csis to verify the information under exempt bank ppu045 investigation, I gave you csis letter to get documents under this secret investigation to prove my case is also valid in past time period starting from 2007/2008 to date continuing never stopping under the law to pay benefits.

If , based on the information the tribunal get from the Canadian government departments and csis , they find that my case is not valid currently and in the past then that is the sufficient proof that these departments and csis are allowing me to remain inside Canada for this specified period in 2007/2008 to date not due to conditions in Canada torturing and removing me from Canada to Pakistan and vice versa for the last 16 years since 2007 to date and they can deny benefits , however, if they find that my case is valid currently and in past , they pay benefits under the law.

My case is valid from 2007 to date as my documents shows that but the minister says that case is only valid now but not in past without confirming from the government if I could not get medical report in 2007/2008 caused by this unlawful removals from Canada carried out by the government and stopped benefits so now it becomes court duty to get information from the government to confirm validity of my claim and if they confirm then you pay benefits otherwise you do not.

My case exposed unlawful activities, policy by the Canadian government in two countries simultaneously, the Canadian government breaking all the laws of the Canada and international and the CPP law does not deny benefits for the unlawful crimes of the Canadian government as a result this proper decision must be made.

The tribunal cannot dismiss a case in which additional evidence is needed and their additional action is required to obtain this additional evidence from the Canadian government, production of documents under ppu045, and court order to verify this exempt bank ppu045 investigation, court must order the Canadian government to provide this evidence and you can have court decree to finding the fact, will prove conviction of these crimes.

Facts, evidence clearly indicate my circumstances beyond my control as to the cause of my disability. When they allowed me to stay inside Canada I got 4 medical reports after mqp and applied for benefits because no income, I was not living in Canada in 2007/2008, I was removed from Canada unlawfully by the government and during this period I was not given a chance to report to doctor or police so under this condition I am eligible for benefits during this period in which I was denied opportunity to live and work in Canada by the government agency csis.

This application will be supported by the following material:

- 1) The tribunal decisions
- 2) Invitation to Settlement Conference – Teleconference
- 3) DM v Minister of Employment and Social Development 2020 SST 997 and 2020 SST 1071
- 4) Medical evidence and letters
- 5) AD01 - Request for Leave to Appeal
- 6) GD15 – for removal record

You can get a copy of my record from the tribunal so I am requesting Social Security Tribunal of Canada Appeal Division to forward a copy of the following submissions to the Registry.

Applicant's submissions are at GD1, GD2, GD3, GD4, GD 5, GD6, GD7, Gd8, GD9, GD11, GD12, GD13, GD15, GD17, AD01, and transcript of oral evidence before a tribunal

This documentary evidence to be used at the hearing of the application.

Regards
Khaliq Hussain
Applicant

Date: October 4, 2022

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[SOR/2021-151, s. 22](#)