

10#1

Court File No. T-329-24

FEDERAL COURT

Between:

ROGER MALONEY

FEDERAL COURT COUR FÉDÉRALE	
FILED	DEPOSE
FEB 20 2024	
NICOLE HRADSKY	
TORONTO, ON	1-

Seal

Applicant(s)

-and-

CANADA Revenue Agency (CRA)

Respondent(s)

NOTICE OF APPLICATION

Pursuant to

TO THE RESPONDENT(S):

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, ONTARIO

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.

# Application

This is an application for judicial review in respect of A DECISION BY THE CANADA REVENUE AGENCY (CRA) TO DENY RELIEF FROM INTEREST THAT ACCRUED FROM 2006 to February 2, 2015. WAS RECEIVED FEBRUARY 12, 2024.

The applicant makes application for: RELIEF FROM INTEREST CHARGED FOR TAX YEARS 2000 to 2003 and COMPOUND INTEREST levied up TO February 2, 2015.

The grounds for the application are: CRA REFUSED TO PROVIDE A TIME EXTENSION TO MY NOTICE OF ASSESSMENT IN 2007. I submitted a Notice of objection ON JULY 24, 2007. THE CRA did not respond with a Notice of confirmation until FEBRUARY 2, 2015.

This application will be supported by the following material:

- CRA DECISION LETTER DATED FEBRUARY 2, 2015
- CRA LETTER from Tax Avoidance Auditor March 22, 2007
- 2ND Letter from Tax Avoidance Auditor dated April 26, 2007
- Letter from me to CRA Sudbury office dated July 24, 2007 supporting my Notice of objection.
- SEVERAL ARTICLES regarding KPMG Court Cases v CRA

The applicant requests C R A to send a certified copy of the following material that is not in the possession of the applicant but is in the possession of the (tribunal) to the applicant and to the Registry:

- Details of UNION CAL PROJECT - National Group November 2022
- CRA AMNESTY OFFER TO KPMG May 2015 signed by S HENDERSON, MANAGER offshore Compliance Section
- DATA FROM MY PERSONAL CRA File from 2003 to 2015 Totalling 805 pages of staff entries and comments as confirmed by ACCESS to Information + Privacy Directorate
- SUMMARY of MY payments to CRA from 2003 onwards including payments made by me, tax refunds withheld and reassessments where bunches were credited to my account.
- Copy of CRA settlement agreements with Shayne Colson and Darcy Tucker Toronto Maple Leaf Hockey players.

Roger Maloney  
Roger MALONEY

24/2/20

- Further news ARTICLES and case law decisions presented well will be

ROGER MALONEY

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**Federal Courts Fees Receipt**  
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NO. **A 623196**



Federal Court of Appeal /  
 Cour d'appel fédérale



Federal Court /  
 Cour fédérale



Court Martial Appeal Court of Canada /  
 Cour d'appel de la cour martiale

To / À :  Name/Nom : <u>ROGER MALONEY</u> Organization/Organisation : _____ Address/Adresse : <u>Oakville</u> _____ _____	Date : <u>20 Feb 2024</u>
	Issuing Office / Bureau émetteur : <u>TC12</u>
	Prepared by / Préparé par : <u>ALL</u>
	Court File No./ N° du dossier de la Cour :  <u>T 329 24</u>

Style of Cause & Description of Services Provided Intitulé de la cause et description des services rendus	Cost(s) Frais
<u>ROGER MALONEY</u> <u>v</u> <u>OKA</u> <u>NOTICE OF APPLICATION</u>	Total = <u>A 50.00</u>

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