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| October 16, 2023 16 octobre 2023 | | | |
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Notice of Application

Court File Number:

FEDERAL COURT

(Court seal)

Notice of Application to the Federal Court for Judicial Review

Between:

Abdelrazag Imbewa

Plaintiff (Applicant)

And:

Canada Revenue Agency (CRA)

Defendant (Respondent)

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, 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.

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

(November 15, 2023)

Issued by:

(Registry Officer)

Address of local office:

Federal Court
180 Queen Street West
Toronto, Ontario
M5V 1Z4

To:

Canada Revenue Agency (CRA)

Sudbury ON, P3A 5C1

And To:

ATTORNEY GENERAL OF CANADA

Office of the Deputy Attorney General of Canada
284 Wellington Street
Ottawa ON K1A 0H8

Respondent

Application

(Where the application is an application for judicial review)

This is an application for judicial review in respect of the decision of CRA to consider the Applicant not eligible for some payments of the Canada Recovery Benefits (CRB) with notification to the Applicant on Oct 16, 2023.

The grounds for the application are:

1. Errors made by the CRA in calculating the eligibility criteria where they came up with two different decisions. They changed the number of eligible periods after the second review and paid the Applicant part of what they initially deducted.
2. Procedural unfairness and failure to provide adequate notice, or any other procedural impropriety. They also neglected the detailed calculations provided to them by the Applicant.

This application will be supported by the following material:

All the decisions received from CRA and the letters and calculations sent by the Applicant to CRA.

The applicant makes application for: Review and Set Aside the CRA's Decisions.

The Applicant seeks the following orders from the court:

1. A comprehensive review of the CRA's decision regarding the CRB payment, and seek an order setting aside the 2 different decisions made on this case.
2. Order a formal review by the CRA CRB payment taking into account all the relevant evidences and calculations provided by the Applicant.
3. A declaration from the court that the CRA's decisions are not supported by the evidences because they neglected the calculations sent to them by the Applicant and they came up with two different decisions between the first and second review.

4. An order for costs associated with the judicial review proceedings, including legal fees and any other expenses incurred, including a compensation for holding funds from the Applicant's TAX refunds before finalizing the case.

November 15, 2023

Abdelrazag Imbewa

A handwritten signature in black ink, appearing to be 'Abdelrazag Imbewa', written in a cursive style.

708 Grand Marais Rd E
Windsor, Ontario, Canada
N8X3H8