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| F I L E D | FEDERAL COURT OF APPEAL COUR D'APPEL FÉDÉRALE | | D É P O S É |
| November 29, 2023 29 novembre 2023 | | | |
| Elizabeth Rabouin | | | |
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FORM 337 Rule 337

Notice of Appeal

Christine Generoux, John Perocchio, Vincent Perrochio (Appellants)

AND

THE ATTORNEY GENERAL OF CANADA (Respondent)

(Court seal)

Notice of Appeal

TO THE RESPONDENT:

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

THIS APPEAL will be heard by the Court at a time and place to be fixed by the Judicial Administrator. Unless the Court directs otherwise, the place of hearing will be as requested by the appellant. The appellants request that this appeal be heard at The Federal Court of Appeal, Ottawa (Thomas D'Arcy McGee Building, 90 Sparks Street Ottawa, Ontario, K1A 0H9)

IF YOU WISH TO OPPOSE THIS APPEAL, to receive notice of any step in the appeal or to be served with any documents in the appeal, you or a solicitor acting for you must prepare a notice of appearance in Form 341A prescribed by the [Federal Courts Rules](#) and serve it on the appellant's solicitor or, if the appellant is self-represented, on the appellant, WITHIN 10 DAYS after being served with this notice of appeal.

IF YOU INTEND TO SEEK A DIFFERENT DISPOSITION of the order appealed from, you must serve and file a notice of cross-appeal in Form 341B prescribed by the [Federal Courts Rules](#) instead of serving and filing a notice of appearance.

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 APPEAL, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU.

(Nov 29, 2023)

Issued by: (Registry Officer)

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Appeal

THE APPELLANT(S) Christine Generoux, John Perocchio and Vincent Perocchio APPEAL to the Federal Court of Appeal (Ottawa, Ontario) against the Federal Court Order of the Honourable Madame Justice Kane dated Oct 30, 2023 in Ottawa, Ontario, whereby the Application for Judicial Review (FC file # T-735-20) and Notice of the Constitutional Questions were dismissed.

The dates upon which the Federal Court heard the parties were April 11-20, 2023.

THE APPELLANTS respectfully request:

- A) an Order allowing the appeal
- B) an Order rescinding the decision(s) of the learned judge
- C) an Order that the Judicial Review, or parts of it, will be re-tried
- D) an Order or declaration that all (or parts of) SOR/2020-96 May 1 2020 and related Criminal Code amendments P.C. 2020-298 May 1 2020 is unreasonable, invalid, unlawful, inconsistent with or *ultra vires* The Criminal Code, or The Constitution Acts 1867-1982 and/or The Canadian Charter of Rights and Freedoms, and/or The Canadian Bill of Rights and is of no force or effect and is inoperable
- E) an Order in the nature of *certiorari* quashing the Order in Council and amendments, or certain parts of them
- F) *i)* An Order in the nature of prohibition instructing the GiC that it is prohibited from prescribing unknown or un-named variants or modified versions of firearms as prohibited without notice
- *ii)* An Order that the GiC is prohibited from forming an opinion that a firearm is not reasonable for use in hunting and sport because it is deadly or dangerous, or because it is modern, or because it is present in large volumes in the Canadian market, or because it is semi-automatic, or because it is centerfire, or because it is customizable, or ergonomic or has interchangeable parts, or because it is capable of accepting illegal magazines

- G) an Order in the nature of a declaration that the newly prohibited items are reasonable for use for the purposes of hunting and sport in Canada, or in the alternative that a subset (the ordinary long guns) of the newly prohibited items are reasonable for such uses, and that the items so declared and all variants and modified versions of them are classified as non-restricted firearms
- H) an Order or declaration under section 52 of the Constitution Act that SOR/2020-96 and related amendments unjustifiably infringe on section 7 or 15(1) and are to that extent of no force and effect
- I) and/or further, in the alternative, such remedies under section 24 of The Charter that this Honorable Court considers appropriate and just in the circumstances
- J) That no costs will be awarded in this appeal
- K) Such further and other relief as Applicants may request and this Honorable Court may permit

THE GROUNDS OF APPEAL are as follows:

1. The learned judge did not apply the standard of review properly.
2. The learned judge did not apply the standard of review uniformly.
3. The learned judge's written reasons switch between the factors governing a legislative instrumental lens and an administrative discretionary decision lens, and always in favor of the Respondent.
4. In particular, the learned judge, having decided to view the decision in a legislative instrument context, did not consistently apply that finding to her assessment.
5. In particular, the learned judge, having decided to view the decision in an administrative decision context, did not consistently apply that finding to her assessment.

6. In concluding that the decision is subject to administrative principles and reasonableness review, the learned judge erred when she concluded that the Bill of Rights does not apply.
7. In concluding that the decision is subject to administrative principles and reasonableness review, the learned judge erred in concluding that the decision maker did not owe a duty of procedural fairness to those affected.
8. Thus, the learned judge erred in not considering the Applicant's and other owners as affected "stakeholders" to whom the decision maker owes a duty of care.
9. The learned judge erred in concluding that the Governor in Council's (GiC, decision maker) decision fell within a scope of reasonable outcomes, defensible on the facts and the law.
10. The learned judge erred when she concluded that the GiC did not exceed the statutory grant of authority delegated to it by Parliament.
11. The learned judge failed to apply the statutory limits on the decision maker's power rigorously, as required.
12. The learned judge misunderstood the purpose of part 3 of the Criminal Code, (The Code) as it relates to part 4 (objectives) of the Firearms Act (The Act) from which it is sourced.
13. The learned judge misunderstood the spirit and the letter of the statutory provisions in the Code, section 117.15 (1-4).
14. The learned judge misstated the GiC's power to prescribe (the power) in 117.15 (1) as a power to "prohibit".

15. The learned judge did not consider that the freshly amended s 117.15 (3) of the Code which enabled less strict prescribing (from restricted or prohibited to a lesser class) speaks to the spirit and intent of the power.
16. The learned judge misunderstood Parliament and the legislature's intent and purpose with the specific statutory restriction, the hunting and sport restriction in section 117. 15(2) (the restriction) and did not apply it as a binding restriction, as Parliament intended.
17. The learned judge failed to recognize the restriction was placed there to protect the ability of Canadians to possess the necessary items to continue achieving excellence in hunting and sport (the protected activities).
18. The learned judge failed to note that the record shows and the decision maker agreed, protecting hunting and sport was important to Canada; hence the legal protection was enshrined in law (the restriction).
19. The learned judge applied the restriction the opposite way it was meant to be applied; Parliament's intent was undermined.
20. The learned judge interpreted the restriction in a way that violates the principles of statutory interpretation, interpreting a binding restriction as no restriction at all.
21. The learned judge failed to interpret the restriction, in light of the provisions in the Criminal Code and Firearms Act, failing to note the importance of the definition of a firearm in section 2 of the Criminal Code (the Code), which defines it (*condicio sine qua non*) as always "dangerous or deadly to people" yet still allows and protects it.
22. The learned judge failed to consider in context, that because a firearm is "dangerous or deadly" this cannot mean that it is unreasonable for use in hunting and sport (the protected activities) since all firearms are, by definition, dangerous, and deadly, yet still allowed by law and deemed to be reasonable.

23. The learned judge failed to note that the neither the power to prescribe, nor the restriction permits the prohibition of firearms for the sole reason of “danger or deadliness”; and that cannot be the purpose and intent of the power nor the restriction upon it, in the Code.
24. The learned judge failed to acknowledge that both the statutory frameworks, in context, specifically empower the lawful possession of and protect, from prohibition, certain “deadly or dangerous” items for safe use in the protected activities.
25. The learned judge made a false equation that the restriction, as read, enables the GiC to broadly prohibit (is the same as saying “*may prescribe as prohibited if*”); failing to give meaning to the required interpretation of a binding negative commandment (“*may not prescribe as prohibited if*”).
26. The learned judge ignored or was silent on the relevant language (“international sporting competition exception”) in section 84 of the Code, which indicates the clear intent of Parliament to protect this activity, not to destroy it.
27. The learned judge failed to take notice of the deleterious results of the decision/prohibition upon the protected activities.
28. The learned judge grossly misstated the Applicant’s arguments that they are “not prevented or deterred in the pursuit of (the protected activities) hunting and sport”, or that the prohibition does not severely impact the ability to do so.
29. The learned judge ignored the evidence of experts and pleas of the Applicants that “our meaningful participation in sport is now destroyed”.
30. The learned judge erred in interpreting the GiC’s power as broad and the constraints on it minimal.
31. The learned judge erred in concluding The Governor in Council had met the required condition precedent.

32. The learned judge erred in her assumption that the necessary opinion was formed.
33. The learned judge erred in her assumption that the opinion was based on the necessary considerations; contrary to the decision makers own admission.
34. The learned judge applied and accepted irrelevant extraneous factors as necessary considerations on the opinion and it's reasonableness.
35. The learned judge ignored the admission (prohibited because deadly, dangerous) in the Regulatory Impact Analysis Statement (RIAS, reasons of the GiC) which states the opinion was not based on any actual uses in hunting or sport purposes and the items practical suitability for use in hunting and sport was disregarded.
36. The learned judge failed to appreciate that this admission demonstrates *prima facie* the required pre-condition was not met.
37. The learned judge ignored evidence and expert testimony which demonstrate the "prohibition criteria" in the RIAS, make the items in question reasonable (not unreasonable) for use in the protected activities.
38. The learned judge thus did not understand that the "prohibition criteria", if it makes the items reasonable for use in the protected activities, demonstrates the opinion to be utterly unreasonable.
39. The learned judge erred in giving undue and undeserved deference (*hyperdeference*) to the decision maker.
40. The learned judge relied on (hearsay) of a non-existent "buy-back program and grandfathering regime" in her assessment and weighing of the reasonableness.

41. The learned judge erred when considering irrelevant factors such as other items remaining available for use in the protected activities in her assessment of the reasonableness of both the opinion/decision and the suitability of the newly prohibited items for use in the protected activities.
42. If the learned judge was correct to take the Regulatory Impact Analysis Statement (RIAS, reason of the decision makers) at face value and correct to consider in her analysis, that they claim other items remain reasonable *and* available for use in the protected activities, the learned judge failed to consider the admission in the RIAS of the intent to remove those other reasonable *and* available items soon, the change clause (*in terrorem clause*).
43. If the learned judge was correct to consider, in her reasonableness analysis, that many other (some highly similar) items remain reasonable *and* available for the purposes of use in hunting and sport (thus our participation in the protected activities can continue), this would strongly indicate that the overriding purpose of the restriction was to protect the items and activities and not some broader public safety objective.
44. The learned judge made a palpable and apparent factual error, contrary to the record, when she stated that the Respondent produced a section 39 Canada Evidence Act certificate (the certificate) on Dec 4 2020, when it was produced on June 15 2021.
45. The learned judge did not consider the ruling of the case management judge that this delay in production of certificate by the Respondent was deliberate and contrary to the Court's orders and timeline (violated rule 3). Silence on this deliberate delay, lack of evidentiary disclosure and non-co-operation, indicates an inappropriate hyperdeference.
46. The learned judge failed to appreciate that this non-disclosure had the effect of thwarting the court's ability to conduct a genuine and robust judicial review.
47. These errors and omissions influenced the learned judge's decision not to draw a negative inference against the Respondent for production of no relevant evidence of information

considered (and to shield any relevant evidence from scrutiny), and in her assignment of evidentiary weight and credibility.

48. The learned judges logic, process or written reasons in deciding to assign or not assign weight to the parties evidence and experts, was sorely deficient or non existent.
49. The learned judge, in showing a hyperdeference to the decision maker and in her assumption of validity, violated the purpose behind, and principles of, a robust and thorough judicial review.
50. The learned judge mischaracterized or omitted critical commentary of “gun control” as defined by the Supreme Court of Canada (SCC).
51. The learned judge ignored or did not understand Parliament’s documented intent of the Act, reiterated by the SCC, as the mechanism in a balancing act between two interests.
52. Thus, the learned judge did not balance the two interests properly, thus could not weigh the GiC’s lack of balance in the decision, clearly.
53. The learned judge did not consider the Applicant’s arguments about “ordinary long guns” being, by SCC definition necessary and reasonable as useful tools in Canada.
54. The learned judge did not realize that (ab)use of what is meant to protect ordinary long guns and lawful activities, to destroy ordinary long guns and the lawful activities is a grave abuse of process and law.
55. The learned judge further mischaracterized the SCC’s commentary on gun control by focusing on limitations on the lawful use of firearms instead of addressing the mischief of it’s criminal or negligent misuse; the pith and substance of the Act.
56. The learned judge erred in her finding that the lack of pre-publication of the Regulations, the lack of meaningful consultation and the lack of disclosure would not speak to the reasonableness review when it applies to the transparency portion of the review.

57. The learned judge misunderstood the “different approach” that the change in wording in the legislation meant to address.
58. The learned judge noted this change in approach was meant to close a loop-hole regarding fully automatic firearms and grenade launchers use in sports; but failed to note this was accomplished long ago.
59. Thus, the learned judge did not understand the restriction is now being (ab)used to accomplish a different goal, in direct contravention of, and undermining, the Act and the restrictions objectives.
60. In her statutory interpretation, the learned judge placed undue emphasis on the opinion of the decision maker which indicates latitude, and no emphasis on what the opinion must be constrained by (intelligibility and justification and the precondition) which indicates necessary restraint.
61. The learned judge did not acknowledge that the opinion must be based around, and is constrained by, reasonability of the items for the legal use in hunting and sport alone and not their use in other illegal activities.
62. The learned judge accepted the decision makers attempt to reverse engineer an outcome and to expand it’s own authority, contrary to the law and jurisprudence.
63. The learned judge did not acknowledge that the opinion on the reasonability of use in hunting and sport must, itself, be reasonable in the context of firearms, as a dangerous and highly regulated item which, notwithstanding, are permitted and necessary for the protected activities by the statutory framework.
64. The learned judge overlooked Parliament’s ultimate intent with this grant of authority was to bind the power, by the restriction, in order to protect the activities and Canadians ability to participate in them.

65. The learned judge noted, but failed to confront, the arbitrary nature of the Regulation when she noted that “many more firearms with the same characteristics remain in the market” (are not prohibited).
66. In her reasonableness assessment, the learned judge failed to make an important differentiation between the lawful and safe use of the items in the protected activities and the tragic and dangerous misuse in criminal activities.
67. The learned judge misunderstood or ignored the application of the reverse onus clause of section 117.11 of the Criminal Code, as it affects the presumption of innocence bearing on the burden of the Applicant’s to prove their own innocence (*mens rea*) and being prevented from doing so, by the vagueness of the Regulation and ongoing lack of notice.
68. The learned judge failed to appreciate or understand serious jeopardy to the Applicant’s section 7 Fundamental Rights and Freedoms which is violated in a way that is not in accordance with the principles of fundamental justice.
69. The learned judge ignored and omitted the Respondents critical admissions on the record that the Regulation was left deliberately vague and it’s terms left undefined so that Canadians and affected businesses could not comply with the law and continue in the protected activities.
70. The learned judge failed to acknowledge that criminal conduct (scope of risk) admittedly left vague for the purposes of non-compliance with the law and mass confusion is unlawful and invalid—and repugnant.
71. The learned judge was silent on critical evidence of lobbying interests, and ignored admissions by the Respondent on the record that the decision constituted a radical and sudden change in opinion and practice, with nothing proposed on the record to explain or

rationalize this change, contrary to the Key Findings of the 2018-19 Public Consultations, SECU committee minutes and other information before the decision maker.

72. The learned judge made several statements in the ruling, in which a reasonable person with thorough knowledge of the case and the law, might form a reasonable apprehension of some sort of personal bias; regarding the credibility of the various Applicants evidence and their experts' oaths and a "vested interest in the outcome because they own guns".
73. The learned judge, in echoing the Respondent, stating that the Applicant's cultural genocide arguments (thoroughly supported by evidence and law) were "extreme and likely offensive", showed a lack of civility and a lack of equal treatment and dignity towards the Applicant's culture and a hyperdeference toward the decision maker.
74. The learned judge failed to take note that the SCC stated that all cultures (and their practices and objects) should be afforded a margin of legal protection and basic respect.
75. The learned judge only noted dictionary definitions, but failed to note that the record shows the Applicant's culture meets the Respondent's definition of a culture and has been named publicly by the Respondent as an integral part of Canadian culture.
76. The learned judge ignored the professed legal duty of the Government to enhance and promote all cultures in Canada, regardless of popularity.
77. The learned judge assumed participation in the gun culture not to be an aspect of one's personal identity that is deeply engrained or practically immutable under s 15(1) of the Charter, contrary to facts and law, with nothing apparent on the record to support this erroneous assumption.
78. The learned judge failed to adhere to Federal Court and SCC guidelines that certain personal choices should not preclude one from receiving equal treatment under, and equal benefit of, the law.

79. The learned judge deemed the culture not to be a distinctive one, without giving any legal reasons for the assumption and without addressing if the Applicants failed to meet the legal test for a distinctive culture in *SCR Van Der Peet*.
80. The learned judge ignored Statistics Canada data on record which demonstrates the Respondent's submission that "lawful firearm owners can and have committed homicide or gun violence in the past" so the prohibition is reasonable or somehow beneficial or necessary, is discriminatory and unsupported by evidence, logic or reason—it lacks any intelligibility and justification.
81. In these repeated discriminatory submissions about lawful gun owners causing harm, the learned judge, nor the decision maker, applied the principle of assumption of innocence to the Applicants; which applies, not only in criminal but in a civil, quasi criminal and administrative settings.
82. The learned judge failed to consider the Regulation unlawfully and unreasonably destroys cultural property essential to the natural history of Canada as defined at law, contrary to The Canadian Cultural Property Import and Export Act, Control List and The Code.
83. The learned judge's reasons were deficient in the weighing of evidence; failing to give any reasons or explanation why one parties evidentiary strength or expert was favoured or chosen over another, again indicating hyperdeference.
84. The learned judge erred in assumption (without any apparent basis in law), "that if a party [or fact witness] has any "interest" in the outcome of a case", their oaths or evidence have less value or reliability.
85. If the assumption of the learned judge (interest in the outcome equaling unreliability) has a basis in law (is correct) then the judge erred in unevenly or inconsistently applying this principle to the parties and experts.

86. The learned judge erred in concluding there is no binding “bargain or agreement” in effect between the current Parliament and its firearm owners; when this bargain or legal agreement is quite apparent in the hunting and sport shooting restriction (section 117.15(2) of The Code, Part 4 of The Act, in the SCR *The Firearms Act 2000*, internal Government documents and in Hansard minutes on the record.)

87. This binding agreement (the Criminal Code restriction) can only be legally changed by amending the Legislation in Parliament, not by circumventing it with Regulatory abuse and therefor is in effect and must be given meaning.

Respectfully submitted on behalf of the Self Represented Applicants,

C. Generoux

November 28, 2023

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