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SR

Court File No: T-871-211

FEDERAL COURT
(Forms 66 and 301)

F I L E D	FEDERAL COURT COUR FÉDÉRALE		D É P O S É
	AVR 18 2024		
	NATALIE WONG		
	VANCOUVER, BC	4	

BETWEEN:

Denise Mary Marshall

Applicant(s)

and

Attorney General Canada

Respondent(s)

Notice of Application

TO THE RESPONDENT(S):

A PROCEEDING HAS BEEN COMMENCED by the applicant. The relief claimed by the applicant appears on the following page.

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 the Federal Court in Vancouver, BC (place where Federal Court ordinarily sits).

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 prepare a notice of appearance in Form 305 prescribed by the *Federal Courts Rules* and serve it on the applicant's solicitor, or where 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.

(Date)

Issued by: _____

(Registry Officer)

Address of local office: _____

TO: (List name and address of each respondent and of every other person required to be served)

1. Attorney General of Canada
840 How St 900
Vancouver BC V6Z 2S9
Canada
- 2.
- 3.
- 4.

Application
(For a Judicial Review)

This is an application for judicial review in respect of: (identify the tribunal and set out the date and details of the decision, order or other matter in respect of which judicial review is sought)

Canada Revenue Agency and

— Chantel H - Senior Assessment Processing + Resource Office
Tax Free Saving Accounts Processing Unit

— Sent a letter dated Mar 25, 2024 - # TB23059151 3072
Stating my second review for Cancellation of tax

— Under Part XI.01 - Tax free saving account (TFSA)
was declined because CRA found - No circumstances
support cancellation of the tax on your excess
TFSA contributions for 2020 + 2021 excess

The decision was communicated to the Applicant on: or about Mar 25, 2024

(insert the date on which the applicant was notified or otherwise became aware of the matter)

The applicant makes application for: (state the precise relief being sought)

CRA

To cancel the tax on excess TFSA
contributions for the 2020 and 2021 tax
year(s).

The penalty of \$11,827.73
+ interest of \$982.00

The grounds for the application are: (state the grounds to be argued, including any statutory provision or rule relied on)

I was wrongfully inflicted / penalized by the
CRA to have to pay "tax" -

Reason / Error - Was not notified that I overcontributed
by CRA until 2021 Aug. For the years 2020-2021
took immediate steps to withdraw

overcontribution in Aug 15/2021.

did not benefit or make \$1 only \$99.18 / only sent emails
that I thought were
scams.

Physical Distasters. COVID 19.

Civil Disruptions / my every day bank was not open
mistakley opened a 2nd Tax Free Saving Account
at 2nd bank that was open

This application will be supported by the following material: (list the supporting affidavits, including documentary exhibits, and the portions of transcripts to be used)

- my Affidavit
- Intax returns - 2019/2021 / low income senior confirmation of withdrawal of TFSA

(If the applicant wishes a tribunal to forward material to the Registry, add the following paragraph)

The applicant requests Canada Revenue Agency (name of the tribunal) 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 Canadian Revenue Tribunal to the applicant and to the Registry: (specify the particular material)

DATED at Vancouver this 18th day of April, 2024

Denice Marshall
Signature of Applicant

The Applicant's Name and Address is:

Name: Denice Marshall
Address: 502-3920 Hastings St
Burnaby BC
V5C-6C7

Telephone: 604 417 8159

Fax Number: () Home 604 291-0069

E-mail: deeava@telus.net