

COURT OF APPEAL FOR SASKATCHEWAN

BETWEEN:

DALE RICHARDSON

Applicant

- and -

KIMBERLEY A. RICHARDSON.

Non-Party (Defendant)

- and -

ASSISTANT COMMISSIONER RHONDA BLACKMORE OF THE ROYAL CANADIAN MOUNTED POLICE (F-DIVISION), JESSICA KARAM, MINISTRY OF HEALTH AND THE SASKATCHEWAN HEALTH AUTHORITY.

Defendants

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**MOTION FOR MANDAMUS AND PROHIBITION**

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**BASED ON THE THREAT TO THE LIFE AND SAFETY OF THE APPLICANT PHYSICAL DOCUMENTS CAN BE SENT IN CARE OF:**

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AND TO: **THE PUBLIC**  
Who have a right to be informed  
The Province of Saskatchewan, and  
Canada  
Self-Represented for the We The People,

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Defendants

**NOTICE OF MOTION**

**TAKE NOTICE**

**THAT** the Applicant will make a motion orally to the Court at the Courthouse at 2425 Victoria Avenue Regina, Saskatchewan on Wednesday October 26th, 2022 at 10:00 AM for the following relief.

1. *A Writ of Mandamus and Prohibition* with the following orders

1. An order to compel the Assistant Commissioner Rhonda Blackmore of the RCMP and/or any of her agents operating in the jurisdiction of Saskatchewan;

to issue arrest warrants for every person involved in the torture, criminal negligence, child trafficking and other related complaints in Canada and the United States;

to remove Karis Kenna Nicole Richardson from the care of whomever she is with and deliver Karis to the Applicant or other such person as the Applicant shall decide, at a location to be determined by the Applicant, to comply with the Convention against Torture;

to seize the property located at 1292 95<sup>th</sup>, Street North Battleford, Saskatchewan, S9A 0G2 and arrest all parties involved in the mortgage fraud;

to deliver direct contact information for Cst. Malissa Sekela, which includes without limitation, cell phone number and email;

2. On order for the Saskatchewan Health Authority and the Ministry of Health to;

End all covid related mandates in the province of Saskatchewan effective immediately;

Remove the unscientific diagnosis associated with the torture of the Applicant;

Deliver all documentation relating to the Aerosol Generating Medical Procedures guidance at no cost to the Applicant

2. An Order prohibiting Assistant Commissioner Rhonda Blackmore or any agent of the F-Division of the Royal Canadian Mounted Police from interfering with, harassing or torturing the Applicant; or attending any residence owned, occupied or regularly attended by the Applicant for any unlawful purposes and
3. An order prohibiting Jessica Karam from harassing, molesting, annoying, persecuting, torturing, interfering with the Applicant or trafficking his children;
4. An order prohibiting Jessica Karam from representing the public interests in this matter or any matter relating to the Applicant or his affiliates in the province of Saskatchewan;
5. An Order with dispensing with service and ordering electronic service for the Mandamus and CACV4048

**THAT THE FOLLOWING MATERIAL WILL BE FILED IN SUPPORT OF THIS APPLICATION**

2. Application for Dispensing With Service;
3. The Affidavit of Dispensing With Service
4. The Affidavit of Dale Richardson
5. Certified Letter of Consent from DSR Karis Consulting Inc. filed to the Court in CACV4048.
6. Pleadings and documents referred to in DIV 70 of 2020.

DATED at Chestermere, this 5th day of September, 2022.



DALE J. RICHARDSON  
Contact for service

unity@dsrkarisconsulting.com  
Tel: (306)-441-7010

**BASED ON THE THREAT TO THE LIFE OF THE APPLICANT PHYSICAL DOCUMENTS CAN BE  
SENT BASED ON THE CONSENT LETTER OF DSR KARIS CONSULTING INC. (EMAIL  
PREFERRED)**

**DSR KARIS CONSULTING INC., AB OFFICE**

C/O Power of Attorney for Alberta: Astra Richardson-Pereira  
116 WEST CREEK MEADOW.  
CHESTERMERE, AB T1X 1T2  
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## INTRODUCTION

7. This *Motion for Mandamus and Prohibition* for Mandamus and Prohibition is filed by DALE RICHARDSON (the “**Applicant**”) against the Jessica Karam rogue agent of the Attorney General of Canada, Assistant Commissioner Rhonda Blackmore of the F-Division of the Royal Canadian Mounted Police, Saskatchewan Health Authority and Ministry of Health who are using their authority and/or their agents or affiliates are using their authority, position and numbers to unlawfully interfere with justice, to *torture and terrorize* the Applicant in a manner that is affecting the public in a negative manner. The systematic torture and actions calculated to cause the physical destruction of the persons named outside of the Applicant, have been treated in such manner to punish, intimidate, coerce and torture the Applicant, and prevent him from bringing evidence to expose their crimes. Any such mention is reasonable and necessary. The Motion for Mandamus is in the public interest to hear, based on the effect cause by the failure of the aforementioned parties to act in accordance with their duties. The conspiracy between rogue agents of the RCMP and the SHA have deprived the Applicant of his right of defence and have placed his life and coincidentally the lives of the public at risk for the reasons listed herein and the attached affidavit and documentation listed hereunder. This motion must be heard for the appeal to proceed. It is impossible otherwise. The failure of the Defendants to uphold the public interest and permit a critical failure in pandemic controls to interfere with the territorial integrity of Saskatchewan, Canada and the United States cannot be permitted to continue especially since it happened as a direct result of interference with the family matter of the Applicant to torture him and his daughters and to destroy a federal corporation. This was done to prevent the reporting of the engineering report that exposed the distribution of a biological weapon that was used to overthrow the government of the United States and deprive the citizens of the United States and Canada of their liberty.

## FACTS

8. A freedom of information request submitted by the Applicant to the Ministry of Health of Saskatchewan demonstrated that there was no risk assessment or engineering report for the

representation of the Aerosol Generating Medical Procedures (“AGMP”) guidance issued by the Saskatchewan Health Authority (“SHA”), or was there any such risk assessment done or any justification of any kind provided the SHA. Justice Zuk ignored this evidence which formed a part of the defence of Dale J. Richardson (“Dale”) and ignored the engineering report and passed judgment without having the expert explain its relation to the facts and killed innocent people by his wilful exclusion of the information critical to the health and safety of the public without any expert evidence to the contrary.

9. The SHA guidance is based on a table issued by the Center for Disease Control (“CDC”) in 2001, and it is used by the Public Health Agency of Canada and Canada several other jurisdictions in Canada.
10. The representation of the AGMP guidance issued by the SHA was the basis of the litigation by DSR Karis, which is obligated by law to operate within the framework of the law.
11. Rule 10-46(1),(2) and 10-47 of the Queen’s Bench Rules are used for the sale of homes being foreclosed.
12. On May 27, 2020 the Applicant in the course of his duties as CEO of DSR Karis signed a Non-Disclosure Agreement that created a contractual relationship with his employer, DSR Karis and Innovation Credit Union.
13. On May 27, 2020 Kimberley A. Richardson attended the family home with Raymond Hebert and Linda Hebert and removed the vehicle that was in the possession of the Applicant after learning that Karis K.N. Richardson was left in the care of her sister Kaysha F.N. Dery.
14. On June 9, 2020 the Applicant acting as the Chief Executive Officer of DSR Karis Consulting Inc. (hereinafter known as “DSR Karis”) passed information to the business response team in Saskatchewan relating to the criminally negligent representation of the Aerosol Generating Medical Procedures guidance issued by the SHA. No reasonable response was given to address the hazards involved with its representation.

15. On June 10, 2020 the Communications Department of the SHA refused to address the hazards identified by DSR Karis when communicating with the CEO of DSR Karis by email. The SHA provided no information relating to any engineering report or risk assessment. The SHA did admit that it was potentially placing its employees at risk using a criminally negligent arbitrary settling time without having any justification for the 2 hour settling time.
16. On June 25 2020 a number of parties in the federal a Saskatchewan government were notified about criminally negligent implementation of engineering controls used for the SARS-Cov-2 pandemic response by DSR Karis by an email sent by its CEO on its behalf. The information provided demonstrated that the hazard was also present in the state of Washington.
17. On June 26, 2020 a number of parties in North Battleford were warned about the hazards arising from the criminally negligent representation of the AGMP provided by the SHA.
18. On June 26, 2020 several financial institutions and regulatory agencies in the province of Saskatchewan and federally were notified of the risk of financial losses to the shareholders arising from the hazards directly tied to the criminally negligent representation of the AGMP provided by the SHA. The fiduciary duty to the shareholders and the public was mentioned.
19. A rogue agent of the Ombudsman for Banking Services and Investments ("OBSI") created, retained and transmitted a forged document based on a document sent to OBSI by DSR Karis on June 26, 2020. The forged document made it appear like the email was transmitted by the Applicant from his personal email address. This forgery has been reported to 5 divisions of the Royal Canadian Mounted Police.
20. On June 29, 2020 the Applicant was served with a divorce petition from Kimberley A. Richardson with Patricia J. Meiklejohn as her counsel. The document contained contradictions, perjury and intent to defraud and was filed to the Court of Queen's Bench for Saskatchewan when it was in violation of the law.
21. On June 29, 2020 the Applicant gained knowledge of a letter addressed to the CEO of DSR Karis from the Association of Professional Engineers and Geoscientists of Saskatchewan after

receiving *documentation that contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA resulting from poor engineering practice*. The letter from APEGS did not address the severe threat to the public interest, but rather attempted to threaten DSR Karis based on Facebook posts and YouTube videos. DSR Karis responded by way of letter directing APEGS of its legislated responsibility to the public interest with respect to engineering. No response was ever given by APEGS.

22. On July 3, and July 7, 2020 the Applicant attended the Battlefords RCMP detachment and made complaints on both days. The complaints on July 3, 2020 were torture pursuant to 269.1 of the Criminal Code (2020-898119) and two counts of criminal negligence. One count of torture and one count of criminal negligence was initiated by the Applicant (2020-898911), and the other complaint (2020-898907) was on behalf of DSR Karis Consulting Inc. ("DSR Karis"). The SHA were the focus of the criminal negligence complaints and their agents were tied to the torture. The complaint on July 7, 2020 was a complaint of torture with Karis K.N. Richardson as the victim (2020-922562).
23. On July 7, 2020, the Applicant had a meeting with Chad Gartner of Innovation Credit Union ("ICU") in which the information discussed was the property of his employer DSR Karis. Chad Gartner was informed of his fiduciary duty to inform the members of ICU of the risk of financial losses arising from the occupational health and safety hazard arising from poor engineering practice tied to the representation of the AGMP guidance issued by the SHA.
24. On July 7, 2020 the Applicant attended the Battlefords Mental Health Centre ("BMHC") to ask for his missing medical records from his access to records. The Applicant asked a manager to have the engineering department get back to him on the hazards arising from the criminally negligent representation of the AGMP provided by the SHA. A doctor who signed a certificate to admit him to the BMHC was present for the conversation. Cora Swerid was informed of the criminal negligence and the torture investigations that involved the SHA. No response was given by the SHA to address the hazards arising from the criminally negligent representation of the AGMP.

25. On July 8, 2020 an email chain was sent by carbon copy to the Applicant that outlined a breach of contract between the rogue agents of Innovation Credit Union and his employer DSR Karis Consulting Inc.. The email outlined a conspiracy to restrict the liberty of the Applicant, his employer and by proxy Karis K.N. Richardson.
26. The RCMP did not allow the Applicant to bring any further evidence as he indicated that he would, and was barred entry from the detachment.
27. On July 22, 2020 Patricia J. Meiklejohn sent two emails to the Applicant of draft orders, one purportedly to correct a typographical error. The first email stated that Justice R.W. Elson requested the interim order through the agents of the court who contacted her. The interim orders were dated for July 22, 2022.
28. From a sworn affidavit submitted to the Federal Court of Canada by the RCMP through Cheryl Giesbrecht exercising the capacity of the Attorney General of Canada in T-1404-20 testified that on July 22, 2020 Justice R.W. Elson directed them to prevent the Applicant from entering the Court of Queen's Bench for Saskatchewan. The unknown member of the RCMP responded with "we have a mental health warrant".
29. On July 22, 2020 members of the PACT team showed up at the residence of the Applicant with two members of the Battlefords RCMP. The persons in attendance were as follows, Tonya Browarny, Ken Startup, Cst. Rivest and Cst. Reid. No direction was ever given to the Applicant to submit to any medical examination as required by the Mental Health Services Act. The RCMP were served for QBG-156 of 2020 after repeated attempts to gain access to the detachment by the Applicant to serve them were frustrated. Medical records from the BMHC state that the Applicant was brought to the BMHC at the time of this incident.
30. On July 22, 2020 Tonya Browarny knowing that she did not comply with the Mental Health Services Act spoke with J. Engleke and proceeded with obtaining a mental health warrant based on fraudulent information from the Provincial Court of Saskatchewan. Tonya Browarny's notes confirm that she did not comply with the Mental Health Services Act and did not meet the criteria to lawfully obtain a warrant.

31. The agents of the SHA stated that the Applicant's religious beliefs are delusions. No agent of the SHA knew what the specific religious beliefs of the Applicant were. Only members of the Battlefords Seventh-Day Adventist church would possess any knowledge of his specific beliefs. Agents of the SHA attends the Battlefords Seventh-Day Adventist church.
32. On July 23, 2020 at about 9:50 am, the Applicant and his daughter Kaysha F.N. Richardson were unlawfully arrested attempting to enter the Court of Queen's Bench for Saskatchewan in Battleford SK, before any of the two hearings the Applicant was scheduled to appear on DIV-70 of 2020 and QBG-156. Both were first appearances presided over by Justice R.W. Elson. The RCMP substantiated this time in an affidavit in T-1404-20.
33. On July 23, 2020 Justice R.W. Elson, with the full knowledge that he directed the RCMP to prevent the Applicant from entering the Court, made interim orders pursuant to no law and grossly exceeded his jurisdiction as a judge sitting in chambers on a first appearance. Justice R.W. Elson made no mention of having directed the Applicant's obstruction that prevented the Applicant from appearing for the matter, as can be observed in the wording of Justice R.W. Elson's fiat shown below:
- [1] Counsel for the petitioner has provided the court with her client's informal estimate of the equity in the family home, roughly between \$8,000 and \$12,000. With this information, I am satisfied that the interim draft order should issue. This order includes authorization for the petitioner to list and sell the house, followed by an accounting for the proceeds. The only thing that should be included in the interim order is for the issue of the parenting to be revisited in one month's time. This should occur on August 27, 2020.
34. The second matter obstructed was the matter of QBG 156/20 DSR Karis Consulting Inc. v Court of Queen's Bench for Saskatchewan et al dated July 23, 2020. Present in the court was Cliff Holm appearing for the Seventh-Day Adventist Church, Lynn Sanya - SHA, Virgil Thomson – rogue agents of Innovation Credit Union, Micheal Griffin – APEGS. Justice R.W. Elson made no mention directing the RCMP to obstruct the Applicant from representing DSR Karis Consulting Inc. and the interests of the public. *The documentation before the Court contained evidence of*

*the criminally negligent representation of the AGMP guidance issued by the SHA and the risk to the general public.*

35. On July 23, 2020, Robert A. Cannon was contact traced at the court, and had to provide his name to sheriff who participated in the obstruction of the Applicant.
36. When the Applicant was brought to the BMHC he questioned the doctor's and physicians why he was prevented from entering the Court by the defendants in QBG-156 when he was to represent DSR Karis as the plaintiff. The Applicant demanded to see the mental health warrant. When persisting to ask these questions, the doctors directed the RCMP and attending health personnel to strip him, strap him to a bed, and forcefully medicate him. The Applicant was never examined. No expert report of the examination was ever provided to the Applicant. The sworn affidavit of the RCMP submitted to the Federal Court of Canada confirms that the Applicant was not examined.
37. While the Applicant was being tortured, Robert A. Cannon filed a habeas corpus several times. One instance the habeas corpus was filed and then it was unfiled. The other documents submitted with the habeas corpus were not unfiled. After the third filing of the habeas corpus the Applicant was released from the BMHC.
38. In QBG 921 of 2020 Justice N.D. Crooks on September 10, 2020 purported to state that there was no deprivation of liberty for any of the persons named in the Habeas Corpus proceeding, which includes without limitation, the Applicant, Kaysha F.N. Dery, and Karis K.N. Richardson. Crooks stated that the deprivation was "theoretical" and that Karis was the subject of a family law dispute. Justice N.D. Crooks denied Karis Kenna Nicole Richardson the right of Habeas Corpus contrary to section 10(c) of the Charter. The Habeas Corpus was filed by Robert A. Cannon to stop the agents of the Saskatchewan Health Authority from torturing the Applicant who was strapped to a bed and administered mind altering drugs that are designed to profoundly disrupt the senses. The torture upheld the trafficking of Karis Kenna Nicole Richardson. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*

39. On October 28, 2020 the Applicant appeared before Justice J.A. Caldwell of the Court of Appeal for Saskatchewan (“CASK”) for a motion to extend for the unlawful orders issued by Justice R.W. Elson. No one appeared for Kimberley A. Richardson, and audio, video and document evidence was presented. Justice J.A. Caldwell ruled in the favour of the party that was not present. The CASK sent back all of the evidence filed to the court. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*
40. When presented with evidence that the testimony of Kimberley A. Richardson was perjured on November 26, 2020, Justice J. Zuk made excuses for the perjury and took the perjured testimony over the overwhelming evidence of the Applicant. Justice J. Zuk ignored evidence that the Applicant was subjected to escalating family violence by his estranged wife Kimberley A. Richardson. Justice J. Zuk ruled in favour of the party that presented perjured evidence and who has demonstrated a pattern of violence towards the Applicant and the child of the marriage Karis Kenna Nicole Richardson. *The documentation supplied by the Applicant contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*
41. Patricia J. Meiklejohn presented to Justice J. Zuk in the chambers hearing the statement of claim of the Applicant in the Federal Court of Canada and complained that the Applicant was bringing a matter before a federal court. *The application in the Federal Court of Canada contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and the risk to the public.*
42. Cheryl Giesbrecht, agent of the Attorney General of Canada submitted motions to the Federal Court of Canada that contained fraudulent shareholder information in regards to DSR Karis, and conspired with the defendant’s counsel in T-1404-20. The Federal Court of Canada ruled in favour of fraud. The shareholder information of DSR Karis is available on the public record in Alberta.
43. Virgil Thomson submitted forged Federal Court documents to the Applicant.
44. Rogue agents of the Court of Queen’s Bench for Saskatchewan demonstrated extreme bias in denying the Applicant the ability to speak and bring evidence to defend himself in Court. This



includes without limitation, evidence of the unlawful abduction (arrest), Justice R.W. Elson ordering obstruction of justice, an officer of the court preventing the Applicant from entering the court, questionable actions of agents of the SHA by forcefully medicating the Applicant to prevent him from representing DSR Karis Consulting Inc. in matters against them that provided evidence of the distribution of a biological weapon by way of the guidelines issued by the SHA during the SARS-Cov-2 pandemic response, and the evidence of the criminal complaints against Justice J. Zuk by DSR Karis and the Applicant before he made any decision on the matters on May 5, 2022 and July 22, 2022.

45. On February 19, 2021 Patricia J. Meiklejohn appeared before Justice B.R. Hildebrandt for an application without notice to transfer the title of the property of the Applicant pursuant to the Land Titles Act. Fraudulent documents were submitted to the court signed by Clifford A. Holm. Justice B.R. Hildebrandt approved the fraudulent transfer of title using the Land Titles Act instead of the Family Property Act.
46. On February 19, 2021 the Applicant appeared for two prerogative writs in chambers before Justice J. Kalmakoff. Justice J. Kalmakoff informed the Applicant that prerogative writs can only be granted before a panel of judges according to the court of appeal act. Justice J. Kalmakoff heard the motion for two prerogative writs when it was impossible for the Applicant to succeed, and Justice J. Kalmakoff did not determine if torture occurred. Justice J. Kalmakoff exercised jurisdiction he did not possess. *The motions contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*
47. On March 1, 2021 an appeal CACV3708 was heard at the Court of Appeal for Saskatchewan of a constitutional Writ of Habeas Corpus. Among those present as counsel for the defendants were, Clifford A. Holm, Cheryl Giesbrecht, Chantalle Eisner, and Michael Griffin representing APEGS. Michael Griffin admitted it was the intention of defending counsel to punish Robert A. Cannon for actions taken by the Applicant and DSR Karis in the Federal Court of Canada. Michael Griffin committed fraud on the record by stating without any evidence that Robert A. Cannon was

- counsel for the Applicant and DSR Karis. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*
48. Every statement of claim or motion in the Federal Court of Canada for DSR Karis is signed by its CEO.
  49. The Applicant is self represented in the Federal Court of Canada and every statement of claim or motion bears his signature.
  50. On March 26, 2021 the Applicant as the CEO of acting as agent of DSR Karis, appeared before Justice J. A. Schwann in the CASK for a motion for stay of execution relating to appeal CACV3798 in which mortgage fraud was committed. Justice J. A. Schwann ruled in favour of the party who committed fraud and was not present. *The motion contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*
  51. On April 1 2021 the Applicant appeared before a three judge panel at the Court of Appeal for Saskatchewan to review orders of Justice J. Kalmakoff and provided over 6000 pages of evidence. Court of Queen's Bench for Saskatchewan and Kimberley A. Richardson were absent. The panel ruled in favour of the absent defendants. *The documentation before the Court contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*
  52. On April 26, 2021 the Applicant fled to the United States to file for protection under the Convention against Torture after being served an affidavit sworn in by an unknown member of the Royal Canadian Mounted Police that admitted the RCMP were instructed by the Court of Queen's Bench for Saskatchewan to prevent the Applicant from entering into the Court on July 23, 2020. The Applicant was fearful of being tortured or killed if returned to Saskatchewan and subsequently fled to the United States for safety. *The motion scheduled to be heard contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*
  53. On April 26, 2021 upon arrival to the Sweetgrass Montana point of entry, the Applicant was tortured in the presence of 5 witnesses, one of whom is an eight year old child. The CBP officers

attempted to coerce the Applicant to return to Canada after he asked for protection under the Convention against Torture, and remove the 6 volumes of evidence of over 3300 pages. When the Applicant refused to remove evidence while fearful of his life, the U.S. Customs and Border Protection officers intimidated and coerced him to dispose of the evidence of him being the director of a Delaware corporation DSR Karis North Consulting Inc. ("Karis North"). The Applicant refused to remove evidence. *The documentation presented at the border contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*

54. Officer Brian Scott and Officer Brian Biesemeyer were the CBP officers directly responsible for the torture of the Applicant. The statement used in the immigration proceedings by the Department of Homeland Security was a product of torture.
55. The Applicant was subjected to torture and severe obstruction of justice in Canada and the United States while being held in custody of ICE, a defendant in T-1404-20.
56. On June 10, 2021 a motion was heard before Justice W. Pentney. Fraud was used to schedule the motion. The Applicant informed Justice W. Pentney that he was denied the motion materials by ICE a defendant in the underlying action, that he was being obstructed by the same and was being tortured by them. Justice W. Pentney proceeded with the motion with full knowledge of these conditions. Justice W. Pentney deceived the Applicant and committed fraud during the hearing. *The documentation provided by the Applicant contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*
57. On June 15, 2021 Justice W. Pentney dismissed the motion of the Applicant when he was seeking relief from torture. Justice W. Pentney stated "*Furthermore, I agree with the comment of Justice Kalmakoff at the acts the Plaintiff terms as torture "are all things that arose from were inherent in, or were incidental to measures that are authorized by law"*". Justice W. Pentney upheld child trafficking and terrorism. Justice W. Pentney and Justice J. Kalmakoff are Prime Minister Justin Trudeau appointees.
58. On June 23, 2021 the Applicant served a motion titled On Petition for Writ of Certiorari in the Supreme Court of the United States to U.S. Magistrate Judge Gordon P. Gallagher and the

District Court of Colorado. Rogue agents of the District Court of Colorado committed fraud. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA.*

59. On June 29, 2021 Michael Duggan fraudulently rejected materials sent with the Writ of Certiorari and other letters. A motion critical to the safety of the Applicant was fraudulently rejected by Michael Duggan on July 2nd after the petition was filed on June 29, 2021. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and the torture used to suppress its reporting.*
60. On July 13, 2021 The Applicant appeared before Immigration Judge Caley for a review of the credible fear determination by the Asylum officer. The Asylum officer was made aware that the Applicant was tortured by the agents of DHS in order to make the statement. The Asylum officer refused to consider that the Applicant was being tortured in custody. When the Applicant raised the subject of being tortured in ICE custody before the Immigration judge, the judges stated that he did not have jurisdiction and could only speak about what happened in Canada. The Immigration judge refused to accept evidence from the Applicant and deprived of due process. No representative from DHS was at the hearing. Over 3500 pages of evidence was presented to DHS. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
61. On July 19, 2021 Officer Blevins attempted to intimidate and coerce the Applicant to consent to destroy his passport.
62. On July 20, 2021 Circuit Judges Holmes, Matheson, and Eid of the United States Court of Appeals for the 10th Circuit fraudulently denied the Applicant's Writ of Mandamus. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
63. Officer Blevins also brought a Canadian passport form for the Applicant to fill out on July 19, 2021 to get a travel document. The Applicant's passport valid for 10 years was in the possession of ICE.

64. On July 26, 2021 Officer Blevins threatened the Applicant with federal prison for the purposes of unlawfully destroying his passport. When the Applicant refused to violate the law, Officer Blevins left and returned with the notice of non-compliance.
65. On July 27, 2021 The Applicant sent a letter requesting that the consulate investigate the treatment of the Applicant and Officer Blevins intimidation and coercion. *The letter contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
66. On July 27, 2021 Prothonotary Mirelle Tabib of the Federal Court of Canada sent orders to the email of Applicant to direct him to have a response for the Case Management of T-1367-20 when the Federal Court of Canada was aware that the Applicant was being obstructed and tortured by ICE a Defendant in T-1404-20 with no access to email.
67. On July 28, 2021 before 6 am Officer in Charge Christopher Jones spoke with the Applicant and refused to investigate the torture of the Applicant while in ICE custody.
68. On August 2, 2021 U.S. Magistrate Judge Kristin L. Mix of the District Court of Colorado issued fraudulent orders in a matter filed by the Applicant. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
69. On August 5, 2021 United States Judge Lewis T. Babcock of the District Court of Colorado dismissed the motion for relief on the basis of fraud. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
70. On August 6, 2021, Michael Duggan fraudulently tampered with an appendix sent to the Supreme Court of the United States in which he re arranged the motion fraudulently calling it a petition to shut evidence out of court. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*

71. August 13, 2021 Judge Lewis T. Babcock used fraud to dismiss the motion. Judge Lewis T. Babcock ignored the numerous references to the convention against torture, allegations and evidence of treason. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
72. On August 16, 2021 Judge Lewis T. Babcock fraudulently dismissed 18 U.S.C. § 3771 case No. 1:21-cv-02183-GPG without contemplating the public importance of reporting treason. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
73. On August 16, 2021 Judge Christine M. Arguello fraudulently dismissed case number 1:21-cv-02208-GPG. The verbiage of her order was almost identical to the order made by Judge Lewis T. Babcock. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
74. On August 25, 2021 a Deputy Clerk known as A. K. From the United States District Court for the District of Columbia used fraud to reject the complaint of the Applicant. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
75. On September 21, 2021 Chief Judge Phillip A. Brimmer of the District Court of Colorado fraudulently dismissed an action that presented compelling evidence and supporting case law for treason, torture and Crimes against Humanity. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
76. On September 28, 2021 J. Babcock was exposed in a Wall Street Journal Investigation for breaking the law by hearing cases where he had a financial interest and did not recuse himself.
77. On October 15, 2021 Acting Registrar of the SCC, David Power sent a letter to the Applicant. He attempted to dissuade the Applicant from appealing the unlawful orders from the Court of Appeal

for Saskatchewan. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting..*

78. On October 13, 2021 the Applicant appeared before Justice Vanessa Rochester in the FCC to appeal orders of P. Tabib obtained by fraud. Justice Vanessa Rochester ruled in favour of the parties who committed fraud. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
79. On October 25, 2021 P. Tabib presided over a case management hearing in the FCC. The judge intimidated and coerced Applicant during the hearing to give up his right of defense. Chantalle Eisner attacked the petitioner verbally during the hearing when the Applicant mentioned intent to punish innocent parties by the SHA.
80. On October 28, 2021 the SCC denied Texas citizen Robert A. Cannon's leave to appeal a habeas corpus denied by fraud. He was punished with costs for an application that presented evidence of the following crimes without limitation, fraud, torture, child trafficking for the purposes of sexual and financial exploitation, criminal negligence, treason in Canada and the United States. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
81. On November 16, 2021, Pastor David Baker of the Living Hope SDA Church ("LHSDAC") contracted Robert A. Cannon for the first time and requested an apology in writing to present to the LHSDAC Church Board. The Board was considering disciplinary action against Robert A. Cannon for the Manitoba-Saskatchewan Conference of the Seventh-Day Adventist Church being named as defendants in an Application for Habeas Corpus filed by Robert A. Cannon, *which contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
82. On December 12, 2021, Pastor David Baker invited Robert A. Cannon to speak with the church board who wanted to punish him for filing the Application for Writ of Habeas Corpus. The Board

made MOTION 21-139: to recommend to the church at a special business meeting on January 22, 2022 at 6:30pm in person at LHSDAC, for **Robert A. Cannon to be placed under disciplinary action by censorship until October 31, 2022.** The motion was carried.

83. On December 30, 2021 the Applicant attempted to enter the United States at the request of United States citizen Robert A. Cannon. The Applicant presented a letter Robert A. Cannon and proof of his United States citizenship and *documentation that contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.* The Applicant and his family were assaulted, intimidated and coerced into returning to Canada after United States citizen Robert A. Cannon warned of the risk of torture and death of the first witness to treason against the United States. The Applicant was tortured and threatened with return to Saskatchewan where he was tortured upon arrival to Coutts AB. The fraudulent warrant issued by rogue members of the Battlefords RCMP was the reason given for the unlawful torture of the Applicant.
84. On January 4, 2022, the director of the Ministry of Justice for Saskatchewan, P. Mitch McAdam sent a letter to DSR Karis about constitutional questions for CACV3798. The letter fraudulently stated that the Applicant raised constitutional questions in the habeas corpus filed by Robert A. Cannon. *The constitutional questions were tied to documentation that contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
85. David Baker and the Board did not provide any information explaining the Reasons for Discipline for the scheduled censorship meeting until January 18 of 2022, five days before the hearing.
86. On January 21 of 2022, Clint Wahl emailed procedures for the disciplinary hearing that restricted the ability of Robert A. Cannon or his witnesses to provide any reasonable defense. Robert A. Cannon stated that the hearing was prejudicial in his open letter to the church on January 22 of 2022. Robert A. Cannon and his witnesses declined to attend the prejudicial hearing. *The evidence for Robert A. Cannon's defense contained evidence of the criminally negligent*



*representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*

87. On January 22 of 2022 **the church membership voted to approve** motion 21-139 at the special business meeting held January 22, 2022 done in Robert A. Cannon's absence.
88. On January 31, 2022 the registrars of the ("CASK") created a fraudulent document from information provided to them by DSR Karis. *This prevented the filing of CACV3798 which contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
89. On February 15, 2022 the Federal Court of Canada created a fraudulent court record that claimed the Applicant acknowledged service that he did not receive. The direction deprived him of the motion record already filed to the Federal Court of Canada which was his defense for a vexatious litigant hearing brought by the SHA against him set for March 1 2022. *The documentation contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.* Emily Price provided the Applicant the msg file purportedly sent with an acknowledgment. It is possible the msg file was forged. The Federal Court of Canada was forced to change the date.
90. On March 15, 2022 Patricia J. Meiklejohn served documents to the Applicant for the purposes of using court rules to remove the right of defense in DIV 70 of 2020, and to dismiss CACV3745 an appeal of the Applicant of Justice J. Zuk's orders appealed December 13, 2020. *Documentation for both matters contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
91. On April 14, Justice J. Zuk admitted in his orders that the court was recording the Applicant, but the Court of Queen's Bench for Saskatchewan have denied any chambers recordings exists.
92. On April 26 2022 Justice J. Zuk attempted to coerce the Applicant into participating in the Court hearing against the advice of the family doctor of the Applicant without lawful cause. Justice J. Zuk determined that evidence that demonstrated the Applicant obtained custody of his eldest

daughter after being a permanent ward of Winnipeg Child and Family Services was part of an “adjournment” application that was never made and assessed costs against the Applicant.

93. On May 5, 2022 Justice J. Zuk created fraudulent orders and stated that the applications and its over 5600 pages of evidence was tied to a recusal application made by an unnamed nephew of the Applicant on May 5, 2022. Justice J. Zuk made a decision based on fraud to state that none of the materials submitted by the Applicant would be on the court record “Accordingly, the documents shall not form part of the court record nor shall they form any part of any decision arising from the matters before me today”. *Documentation for the matters contained evidence of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
94. On July 20, 2022 Justice J. Zuk received a fax from DSR Karis alerting Justice J. Zuk that he was reported for crime. Justice J. Zuk received certified corporate records from the director of DSR Karis of its complaint and supporting materials. Jennifer Fabian committed fraud and stated in writing that the Applicant sent the materials to Justice J. Zuk for his personal complaint and stated that they would be sealed in an envelope on the court record. *Documentation contained evidence of complaints made to law enforcement of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
95. On July 22, 2022 Justice J. Zuk issued orders relating to the matters that he was reported for crimes to five divisions of the RCMP and to the Federal Bureau of Investigation. Justice J. Zuk contradicted his previous orders and included all of the evidence and used fraud to issue orders for financial gain. *Documentation before Justice J. Zuk contained evidence of complaints made to law enforcement of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
96. On July 25 2022 unknown agents of the Court of Queen’s Bench for Saskatchewan fraudulently applied court rules to prevent evidence or criminal activity from being placed before the court. It is possible one of the agents reported used their position to shield themselves from being exposed for crime.

97. On August 24, 2022 an Unknown Registrar of the CASK attempted to place the motion for Mandamus in chambers where it was impossible for Dale to get relief after doing so for two motions for prerogative relief place before Justice J. Kalmakoff and then a subsequent time after that. This is an observed pattern of deliberate intent to prejudice.

## **ARGUMENTS**

### **I. REASONS FOR MANDAMUS**

98. For a Writ of Mandamus to be enforced, the Applicant must demonstrate that he has a legal right to compel the Defendant to do or to refrain from doing the specific act. The duty enforced must have two qualities:

1. It must be a duty of a public nature: and
2. The duty must be imperative and not discretionary.

### **II. THE DUTY IS OF A PUBLIC NATURE**

99. The duty to arrest the progression of torture is a public nature. On July 3, and 7, 2020 the Battlefords RCMP issued file numbers for torture for the Applicant and his daughter Karis K.N. Richardson. Torture is prohibited by section 12 of the Charter, and section 7 of the same is violated as torture is a gross deprivation of liberty. The Convention against Torture which has universal jurisdiction in Canada, expressly prohibits torture and demands that the perpetrators of torture be arrested. The Convention against Torture demands that all measures be employed by the state party to prevent acts of torture. No reasonable limits can ever exist to subject the public to crime.

100. Justice Zuk in violation of the Charter by his actions set precedent that Black persons are not people under the Charter and have no rights as human beings and have less rights that a slave.

101. Child trafficking is not permissible by the Courts and it is of a public nature to stop child trafficking for the purposes of exploitation by the state.

102. Fraud is not permitted to be used in a court to obtain any order. Numerous instances of fraud have been used to deprive the Applicant and Karis Kenna Nicole Richardson of rights.

103. The statistical analysis in the engineering report presents irrefutable evidence of criminal activity in DIV 70 of 2020 and the Alberta Queen's Bench Matters and T-1404-20. Crimes committed in the courts is of the most extreme public nature. Jessica Karam is directly tied to the Alberta and T-1404-20 matters.
104. Jessica Karam used fraudulent shareholder information of a federal corporation for financial gain in T-1404-20. Jessica Karam abused the powers of the Attorney General of Canada to commit fraud, traffick a child and disrupt an essential service in a manner not authorized by law that was designed to cause harm to the public listed in sections (A)-(C) in 83.01(b) of the Criminal Code.
105. The Ministry of Health has no scientific justification for the issuance of the Aerosol Generating Medical Procedures neither does the SHA. As a part of the risk assessment used for the pandemic response the entire response must be re-examined based on faulty implementation. Since criminal negligence complaints are attached to the faulty risk assessment every death resulting from the pandemic response is criminal negligence causing death and all mandates must be stopped until a proper risk assessment can be conducted.
106. An observable pattern of deliberate intent to prejudice Dale by the Unknown Registrars of the CASK and Amy Groothius cannot be permitted to continue. This is a 100% rate of deliberate intent to prejudice and is irrefutable evidence of bias. Deliberate intent is further reinforced when there is a 0% rate of errors against opposing parties that favour Dale, ruling out incompetence as there would be a reasonable distribution of errors affecting all parties involved. No such distribution occurs. All errors are skewed to give favourable outcomes to anyone who opposes Dale
107. Exposing criminally negligent guidelines relating to the SARS-Cov-2 pandemic are in the utmost public interest. The public has a right not to be subjected to criminal negligence causing death.

### **III. THE DUTY MUST BE IMPERATIVE AND SHOULD NOT BE DISCRETIONARY**

108. The prohibition on torture is an imperative duty. The Convention against Torture demands that the perpetrators of torture be arrested. There is an obligation to investigate the torture as it has

continued because of the failure on the part of the RCMP to arrest the persons involved in the initial torture complaint, and further instigated torture with the parties implicated in the initial complaints. The torture of the Applicant continued even after he fled to the United States, in the presence of witnesses who have supplied affidavit evidence that is a part of this motion.

109. There is no right of any person to commit crime, nor is there any discretion permitted anywhere for organized crime to be perpetrated in the government or any other organization in Saskatchewan. This makes the duty imperative. Justice Zuk continued to further torture rather than restrain it and made a decision on a matter asking relief from torture in which he was implicated in and no reasonable person would believe that he had any reason to violate the Convention against Torture and the Canadian Victims Bill of Rights (“CVBR”).
110. The right to life of the public is imperative. The state has no right to murder the public. No mandate derived by crime is enforceable and must be stopped. Court rules cannot be used to murder innocent people or deprive people of rights.
111. The arbitrary removal of rights from a person is not sanction nor does any judge have the right to torture people or commit crimes.
112. No child should be subjected to deprivation of liberty and torture to shield crimes of other parties.
113. No child should be trafficked by the courts or any other agency of the state.

#### **IV. CLEAR RIGHT TO THE PERFORMANCE OF THAT DUTY:**

114. The issuance of the file numbers for the complaints of torture on July 3, 2020 and July 7, 2020 by the RCMP has placed the obligations of the Convention against Torture on the state party.
115. The issuance of file numbers for criminal negligence complaints on July 3, 2020 by the RCMP places the right of the public to be protected from criminal negligence and every act that arose as a result of the criminal negligence. This includes every SARS-Cov-2 measure instituted after July 3, 2020 as it arose as a result of multiple crimes. This includes without limitation, lockdowns, vaccination mandates and travel mandates.

116. Children are persons under the Charter and have a right to not be victims of crime and torture. Parental consent does not give the state the right to victimize a child. The tests of section 7 and 12 for cruel and unusual treatment will be applied to the treatment of a child used to shield criminal activity.

**(ii) Right to liberty**

The liberty interest protected under section 7 has at least two aspects. The first aspect is directed to the protection of persons in a physical sense and is engaged when there is physical restraint such as imprisonment or the threat of imprisonment (*R. v. Vaillancourt*, [1987] 2 S.C.R. 636 at 652), arrest (*Fleming v. Ontario*, 2019 SCC 45 at paragraph 65), custodial or non-custodial detention (*R. v. Swain*, [1991] 1 S.C.R. 933; *Winko v. British Columbia (Forensic Psychiatric Institute)*, [1999] 2 S.C.R. 625 at paragraph 64; *R. v. Demers*, [2004] 2 S.C.R. 489 at paragraph 30).....state compulsions or prohibitions affecting one's ability to move freely (*R. v. Heywood*, [1994] 3 S.C.R. 761 at 789). The physical restraint can be quite minor to engage the liberty component, such that compelling a person to give oral testimony constitutes a deprivation of liberty (*Thomson Newspapers Ltd. v. Canada*, [1990] 1 S.C.R. 425 at 536; *R. v. S.(R.J.)*, [1995] 1 S.C.R. 451 at 479; *Branch*, *supra* at 26; *Re: Application under section 83.28 of the Criminal Code*, [2004] 2 S.C.R. 248 at paragraph 67)

This aspect of liberty includes the right to refuse medical treatment (*A.C.*, *supra*, at paragraphs 100-102, 136) and the right to make "reasonable medical choices" without threat of criminal prosecution: *R. v. Smith*, [2015] 2 S.C.R. 602 at paragraph 18. It may also include the ability to choose where one intends to live (*Godbout*, *supra*), as well as a protected sphere of parental decision-making for parents to ensure their children's well-being, e.g., a right to make decisions concerning a child's education and health (*B.(R.)*, *supra*, at paragraph 80)

**(iii) Right to security of the person**

Security of the person is generally given a broad interpretation and has both a physical and psychological aspect. The right encompasses freedom from the threat of physical punishment or suffering (e.g., deportation to a substantial risk of torture) as well as freedom from such punishment itself (*Singh*, *supra* at 207; *Suresh*, *supra*, at paragraphs 53-55). It is also engaged where police use force to effect an arrest (*Fleming*, *supra*, at paragraph 65).....Security of the person includes a person's right to control his/her own bodily integrity. It will be engaged where the state interferes with personal autonomy and a person's ability to control his or her own physical or psychological integrity, for example by..... imposing unwanted medical treatment (*R. v. Morgentaler*, [1988] 1 S.C.R. 30 at 56; *Carter*, *supra*; *Rodriguez*, *supra*; *Blencoe*, *supra* at paragraph 55; *A.C.*, *supra*, at paragraphs 100-102).....Security of the person will be engaged where state action has the likely effect of seriously impairing a person's physical or mental health (*R. v. Monney*,

[1999] 1 S.C.R. 652 at paragraph 55; Chaoulli, supra at paragraphs 111-124 and 200; R. v. Parker, 49 O.R. (3d) 481 (C.A.). State action that prevents people engaged in risky but legal activity from taking steps to protect themselves from the risks can also implicate security of the person (Bedford, supra, at paragraphs 59-60, 64, 67, 71).

In addition, the right is engaged when state action causes severe psychological harm to the individual (G.(J.), supra at paragraph 59; Blencoe, supra at paragraph 58; K.L.W., supra, at paragraphs 85-87). To constitute a breach of one's psychological security of the person, the impugned action must have a serious and profound effect on the person's psychological integrity and the harm must result from the state action (Blencoe, supra at paragraphs 60-61; G.(J.), supra; K.L.W., supra. The psychological harm need not necessarily rise to the level of nervous shock or psychiatric illness, but it must be greater than ordinary stress or anxiety. The effects of the state interference must be assessed objectively, with a view to their impact on the psychological integrity of a person of reasonable sensibility (G.(J.), supra). Although not all state interference with the parent-child relationship will engage the parent's security of the person, the *state removal of a child from parental custody constitutes a serious interference with the psychological integrity of the parent qua parent and engages s.7 protection* (G.(J.), supra, at paragraphs 63-64; K.L.W., supra, at paragraphs 85-87)..... The Court has signaled the possibility that victims of torture and their next of kin have an interest in finding closure that may, if impeded, be sufficient to cause such serious psychological harm so as to engage the security of the person (Kazemi Estate v. Islamic Republic of Iran, [2014] 3 S.C.R. 176 at paragraphs 130, 133-34).

## **Principles of fundamental justice**

### **General**

The principles of fundamental justice are not limited to procedural matters but also include substantive principles of fundamental justice (Re B.C. Motor Vehicle Act, [1985] 2 S.C.R. 486 at paragraphs 62-67). The principles of fundamental justice are to be found in the basic tenets of our legal system, including the rights set out in sections 8-14 of the Charter (Re B.C. Motor Vehicle Act, supra, at paragraphs 29-30) and the basic principles of penal policy that have animated legislative and judicial practice in Canada and other common law jurisdictions (R. v. Lyons, [1987] 2 S.C.R. 309 at 327; R. v. Pearson, [1992] 3 S.C.R. 665 at 683).

The principles of fundamental justice include the principles against arbitrariness, overbreadth and gross disproportionality. A deprivation of a right will be arbitrary and thus unjustifiably limit section 7 if it "bears no connection to" the law's purpose (Bedford, supra, at paragraph 111; Rodriguez, supra at 594-95; Malmo-Levine, supra at paragraph 135; Chaoulli, supra at paragraphs 129-30 and 232; A.C., supra, at paragraph 103).

Overbreadth deals with laws that are rational in part but that overreach and capture some conduct that bears no relation to the legislative objective (Bedford, supra, at

paragraphs 112-113; Heywood, *supra*, at 792-93; R. v. Clay, [2003] 3 S.C.R. 735 at paragraphs 37-40; Demers, *supra*, at paragraphs 39-43). An appropriate statement of the legislative objective is critical to proper overbreadth analysis. The objective must be taken at face value — there is no evaluation of the appropriateness of the objective.

Gross disproportionality targets laws that may be rationally connected to the objective but whose effects are so disproportionate that they cannot be supported. Gross disproportionality applies only in extreme cases where “the seriousness of the deprivation is totally out of sync with the objective of the measure” (Bedford, *supra*, at paragraph 120; Canada (Attorney General) v. PHS Community Services Society, [2011] 3 S.C.R. 134 at paragraph 133; Malmo-Levine, *supra*, at paragraph 169; Burns, *supra* at paragraph 78; Suresh, *supra*, at paragraph 47; Malmo-Levine, *supra*, at paragraphs 159-160).

The issue of disproportionate punishment (if it will be imposed by Canadian government action) should generally be approached in light of section 12 of the Charter (protecting against punishments that are grossly disproportionate, and thus “cruel and unusual”), not section 7 (Malmo-Levine, *supra*, at paragraph 160; R. v. Lloyd, [2016] 1 S.C.R. 130 at paragraph 43; R. v. Safarzadeh-Markhali, [2016] 1 S.C.R. 180 at paragraph 73)

Vagueness offends the principles of fundamental justice [1992] 2 S.C.R. 606 at 626-627 and 643; Ontario v. Canadian Pacific Ltd., [1995] 2 S.C.R. 1028 at 1070-72; R. v. Levkovic, [2013] 2 S.C.R. 204 at paragraphs 47-48)

## **(ii) Procedural fundamental justice**

The principles of fundamental justice incorporate at least the requirements of the common law duty of procedural fairness (Singh, *supra*, at 212-13; Lyons, *supra*, at 361; Suresh, *supra* at paragraph 113; Ruby, *supra* at paragraph 39). They also incorporate many of the principles set out in sections 8-14 of the Charter (Re B.C. Motor Vehicle Act, *supra*, at paragraphs 29-30).....Context is particularly important with respect to procedural fundamental justice — the more serious the infringement of life, liberty and security of the person, the more rigorous the procedural requirements (Suresh, *supra*, paragraph 118; Charkaoui (2007), *supra*, paragraph 25; Charkaoui v. Canada (Citizenship and Immigration, [2008] 2 S.C.R. 326, at paragraphs 53-58)....However, the guiding question is always the severity of the impact on protected interests rather than a formal distinction between the different areas of law (Charkaoui (2008), *supra* at paragraph 53).

While some types of abuse of process (e.g., delay) may be better considered in relation to other Charter protections, abuse of process captures at least two residual aspects of trial fairness: (1) prosecutorial conduct affecting the fairness of the trial; and (2) prosecutorial conduct that “contravenes fundamental notions of justice and thus undermines the integrity of the judicial process” (O’Connor, *supra*, at paragraph 73).



The following are procedural principles of fundamental justice that have been found to apply outside the criminal context: the right to a hearing before an independent and impartial tribunal (*Ruffo v. Conseil de la magistrature*, [1995] 4 S.C.R. 267 at paragraph 38; *Pearlman v. Manitoba Law Society Judicial Committee*, [1991] 2 S.C.R. 869, at 883; *Charkaoui* (2007), *supra*, at paragraphs 29, 32); the right to a fair hearing, including the right to State-funded counsel where circumstances require it to ensure an effective opportunity to present one's case (*G.(J.)*, *supra* at paragraphs 72-75 and 119; *Ruby*, *supra*, at paragraph 40); the opportunity to know the case one has to meet (*Chiarelli*, *supra*, at 745-46; *Suresh*, *supra* at paragraph 122; *May v. Ferndale Institution*, *supra*, at paragraph 92; *Charkaoui* (2007), *supra*, at paragraph 53), including, where the proceeding may have severe consequences, the disclosure of evidence (*Charkaoui* (2008) at paragraphs 56, 58; *Harkat*, *supra* at paragraphs 43, 57, 60); *the opportunity to present evidence to challenge the validity of the state's evidence* (*Suresh*, *supra* at paragraph 123; *Harkat*, *supra*, at paragraph 67); the right to a decision on the facts and the law (*Charkaoui* (2007), *supra*, paragraphs 29, 48); the right to written reasons that articulate and rationally sustain an administrative decision (*Suresh*, *supra*, at paragraph 126); and *the right to protection against abuse of process* (*Cobb*, *supra*, at paragraphs 52-53). The application of these principles is highly contextual, but it may be assumed that if they apply outside the criminal context, they apply with greater force in the criminal context.

### **Treatment or punishment by Canadian state actor**

Detention for non-punitive reasons is a treatment — including the detention of permanent residents and foreign nationals for immigration-related reasons, as authorized under the Immigration and Refugee Protection Act (*Charkaoui v. Canada* (Citizenship and Immigration), [2007] 1 S.C.R. 350 at paragraphs 95-98).

### **Cruel and unusual?**

This is a high threshold. To be cruel and unusual the treatment or punishment must be “grossly disproportionate”: in other words, “so excessive as to outrage standards of decency”, and be “abhorrent or intolerable to society”. The threshold is not met by treatment or punishment that is “merely excessive” or disproportionate (*Smith*, *supra*, at 1072; *Morrisey*, *supra*, at paragraph 26; *Malmo-Levine*, *supra*, at paragraph 159; *R. v. Ferguson*, [2008] 1 S.C.R. 96, at paragraph 14; *Nur*, *supra*, at paragraph 39; *R. v. Lloyd*, [2016] 1 S.C.R. 130 at paragraph 24; *R. v. Boutilier*, [2017] 2 S.C.R. 936, at paragraph 52; *Boudreault*, *supra* at paragraph 45).

### **Extreme or irreversible treatments or punishments**

Torture is “blatantly contrary to section 12” (*Kazemi Estate v. Islamic Republic of Iran*, [2014] 3 S.C.R. 176, at paragraph 52; *Suresh v. Canada* (Minister of Citizenship and Immigration), [2002] 1 S.C.R. 3, at paragraph 51). For the generally agreed-upon

definition of “torture”, see section 269.1 of the Criminal Code and Article 1 of the Convention against Torture.

117. From the previous sections quoted it is clear that the very mention of torture complaints for a child and the clear deprivation of liberty, the section 7 violations, denial of principles of fundamental justice to prolong torture of the child and the parent to cover criminal negligence that affects the public as a whole gives a clear right to duty. Further compounding that right to duty is the trafficking of the child for the purposes of exploitation used to cover serious crimes. The excessive treatment the child and parent is so extremely offensive given it was done to prevent the exposure of criminal negligence tied to the implementation of SARS-Cov-2 measures from July 3, 2020 to the present.
118. Black people are persons under the Charter and have rights. No party in any court has respected the rights of Dale as a black man and have used every excuse to deprive him of rights and sanction criminal activity and treat him worse than a slave.
119. Black people have the right to the same protection from the law. Dale was never given any.
120. Jessica Karam has demonstrated extremely racist, discriminatory, biased and predatory behaviour towards the Applicant and has ignored severe crimes against him and the public. Based on the crimes she has shielded, the evidence contained in the engineering report proves that Jessica Karam is a terrorist.
121. Jessica Karam is aware that she has been reported for crime in 5 divisions of the RCMP and to law enforcement in the United States and refuses to remove herself from the matters , demonstrating that she has no regard for the law, and a hatred of Dale J. Richardson.
122. A Caucasian woman paid \$6.7 million dollars in legal fees and is not questioned and Dale was forced to pay child support while being a student and stripped of all assets by the courts and gave them to the Caucasian whom who purportedly could not pay her bill and had to sell the family home on a first appearance for \$170,000.00. That 3959% increased cost of legal fees over the value of the asset said not to be afforded is an impossibility. There ability to pay the cost of legal

fees demanded an accounting of funds before issuing any divorce. The payment of legal fees is evidence of criminal activity. Crimes cannot be used to obtain orders in any Court.

123. Justice J. Zuk was aware that he was reported for crimes which includes without limitation child trafficking for the purposes of sexual and financial exploitation, mortgage fraud, terrorism, treason, crimes against humanity and criminal negligence causing death. He was obligated to recuse himself from the matters.
  124. Amy Groothius was aware that she was reported for crimes which includes without limitation child trafficking for the purposes of sexual and financial exploitation, mortgage fraud, terrorism, treason, crimes against humanity and criminal negligence causing death. She was obligated to recuse herself from the matters. And the Unknown Registrar had no right to refuse the documents based on rule contravention or place Dale in a position where it is impossible for him to succeed.
  125. There is no right present anywhere for any person, organization or entity in Canada that has a right to commit crime or benefit from crime in any capacity.
  126. Child trafficking and terrorism are not permissible and stopping every action derived from the commission of the forgoing crimes and the ones listed in the documentation hereunder are a clear right to duty.
- A. **There Was a Conspiracy to Defraud and Torture the Plaintiff by State and Private Actors.**
127. Since Rule 10-46(1),(2) and 10-47 were used for homes that are in foreclosure, it could not be lawfully used by Justice R.W. Elson in the family matter. This demonstrates intent to defraud.
  128. No law permits a judge to order the sale of the home on a first appearance, or give possession of a home that a person is living in without consideration of where the person is going to live especially when there is a child involved.
  129. The RCMP seized the home of the Applicant and the registered office of DSR Karis Consulting Inc. without any lawful order of the court. The treasonous orders of Justice R.W. Elson were not

issued until 4:03 pm on July 23, 2020 and the RCMP unlawfully breached the property at about 2 pm on July 23, 2020 clearly using force to take possession of the registered office to dispose of evidence of their criminal activity.

130. Justice R.W. Elson did not consider section 7 of the Family Property Act (SK) and in doing so, he violated the law expressly as there is no consideration made with any of these things in any order given by Justice R.W. Elson. What Justice R.W. Elson exercised was tyranny and a complete disregard for the law and since force was used by members of the RCMP to accomplish this end and to overthrow the rule of law it is explicitly treason against Canada.

131. The actions of the named parties in this motion demonstrate conspiracy as defined by the Criminal Code and have defrauded Dale beyond a reasonable doubt. The engineering report confirms this.

**B. The Parties On July 23, 2020 are Conspirators to Treason and those who Worked to Conceal the Overt Acts of that Day**

132. The actions taken by the defendants in this action and others affiliated with them mirror the actions taken by actors in the United States that have established case law that demonstrates that they are conspiring to commit treason. *Conspiracy to altogether prevent enforcement of statute of United States is conspiracy to commit treason by levying war against the United States. Bryant v. United States, 257 F. 378, 1919 U.S. App LEXIS 2212(5<sup>th</sup> Cir. 1919).* The principle of comity demands that Canada respect the judicial decisions of the United States especially when it comes to what constitutes treasonable conduct. United States criminal case law does provide for punishment of a treaty as in the case of a normal law. *Treaty with foreign power was supreme law of land; Congress could provide punishment for its infraction on deprivation of or injury to right secured by it, as in case of ordinary law. In re Grand Jury (1886, DC Or) 11 Sawy 522, 26 F 749.* An overt show of force is not required if the conspiracy is exposed early. *The **Government contends that, but for the timely interruption of the conspiracy by the apprehension of its leaders actual resistance would have come about.** The greater part of the evidence relied upon by the government to establish the conspiracy related to facts which occurred before the*

*passage of the selective Draft Act. United States. Bryant v. United States, 257 F. 378, 1919 U.S. App LEXIS 2212 (5<sup>th</sup> Cir. 1919).* Treason is a crime that it is impossible to commit without a conspiracy.

**C. The Court of Queen's Bench for Saskatchewan or any Other Associated Party Has Failed to Comply with the UN Torture Convention and shielded criminally negligent guidelines that have resulted in death**

133. The Applicant raised the question of unlawful, arbitrary and unconstitutional detention with this court in a motion to extend with Justice J.A. Caldwell in chambers on October 28, 2020, and in the orders denying the motion to extend, no mention is made of the arbitrary arrest as it played a factor into the issuing of the interim orders by Justice R.W. Elson, and the subsequent torture at the Battlefords Mental Health Centre at the hands of the RCMP and the SHA. Justice N.D. Crooks did not consider these circumstances when taking into account the deprivation of liberty for Karis K.N. Richardson and determined that it was theoretical. No application of the law to determine the validity of the detention, nor the deprivation of liberty.
134. No lawful sanction was ever used to forcibly medicate the Applicant with psychoactive drugs designed to profoundly disrupt his senses, or warrant the inhumane, cruel and degrading treatment he received by being stripped, and strapped to a bed and drugged in a manner that placed him at severe risk of injury and death.
135. APEGS failed to act in the public interest and allowed the crimes to be executed against the people of Saskatchewan with full knowledge that the AGMP guidance were not compliant with numerous laws including without limitation, Criminal Code, APEGS act and labour laws.
136. Every judge in Saskatchewan presented with this evidence committed fraud and/or other crimes to prevent evidence of the criminal negligence relating to the implementation of SARS-Cov-2 from ever being placed on the court record.
137. The actions that affected the absence of the Applicant are criminal based on the sworn affidavit submitted to the Federal Court of Canada by Cheryl Giesbrecht on behalf of the RCMP. The sworn affidavit of Astra Richardson-Pereirra retired public servant of the RCMP who worked in

both the Major Crimes Unit and GIS has testified that the warrant does not follow RCMP protocol and that there is a second copy of every keystroke taken on any computer in Ottawa and the RCMP failed to provide this.

138. Amy Groothius and the Unknown Registrars are personally responsible for murder using the rules of the court to prevent unscientific mandates from being used to distribute a biological weapon in Canada and the United States and have directly affected the overthrow of the government of the United States and concealing the treason that occurred in 2020 that was a direct result of the engineering guidelines that provided the means to overthrow the government of the United States. Justice J. Zuk and the Registrar of Land Titles is directly responsible for the same.

D. **The Conspirators in the United States Courts and Other Agencies Have Demonstrated Actions That are Consistent With Treason Against the United States**

139. The unlawful rejection of the Supreme Court motion was necessary as the motion clearly demonstrated that the conditions of the Writ of Mandamus before the 10th Circuit were being met. With the motion on the Court record, it would be problematic for the 10th Circuit especially since it predicted punishment from the 10th Circuit. It also gave the corrupt agents in the 10th Circuit reason not to give the Applicant oral arguments as requested for the Mandamus, as he would have made those arguments in the hearing and referenced the 3300 page appendices leaving the judges virtually no room to deny the Mandamus. The panel officially violated the Convention against Torture and kept any mention of treason and the Invariable Pursuit of the Object from being on the court record.

140. On July 20, 2021 Circuit Judges Holmes, Matheson, and Eid of the United States Court of Appeals for the 10th Circuit abused their position as circuit court judges to use fraud to conceal *evidence of complaints made to law enforcement of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting* to deny the Writ of Mandamus.

141. Article III, Section 3, Clause 1 of the UNITED STATES Constitution defines treason because it threatens the very foundation of the UNITED STATES OF AMERICA, the Inalienable Rights to Life, Liberty and the Pursuit of Happiness. This definition can and should be used for Canada as well.
142. The right to not be tortured is an inalienable right under the United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. Any statement determined that was obtained of torture cannot be used in any proceeding other than to prove the person was tortured. There is compelling evidence that numerous statements were obtained by torture.
143. 18 U.S.C. § 3771 provides rights of the crime victim to be protected from the accused and since the Applicant was held by persons who have continually tortured and obstructed him, he has a right to be protected from them. The Applicant was not protected to conceal *evidence of complaints made to law enforcement of the criminally negligent representation of the AGMP guidance issued by the SHA and crimes used to suppress its reporting.*
144. As a United States Judge Lewis T. Babcock had an obligation to overlook any purported deficiency and examine forthwith the documents that purported federal treason. The judge used his position to obstruct justice and committed an overt act of treason. In addition to this, he deprived the Applicant of rights pursuant to 18 U.S.C. § 242 and the overt acts were party to 18 U.S.C. § 241. J. Babcock fraudulently stated that the motion “*does not include any claims, factual allegations or request for relief.*” The denial of the torture complaint under the Convention against Torture does allow for the prosecution of 18 U.S.C. § 241. *Treaty with foreign power was supreme law of land; Congress could provide punishment for its infraction on deprivation of or injury to right secured by it, as in case of ordinary law. In re Grand Jury (1886, DC Or) 11 Sawy 522, 26 F 749.* J. Babcock was exposed for corruption in a newspaper article, and admitted his corrupt actions.
145. The overt actions of Michael Duggan delineates a determined effort to deprive the Applicant of rights who is both an Alien and Black. Michael Duggan demonstrates that he is acting as a part of a conspiracy to prevent the enforcement of a United States Statute. It is reasonable that there is a criminal civil rights violation pursuant to 18 U.S.C. § 241. 18 USCS § 241 *does not require that*

*any overt act be shown. United States v Morado (1972, CA5 Tex) 454 F.2d 167, cert den (1972) 406 US 917, 32 L Ed 2d 116, 92 S Ct 1767.*

146. Officer C. Jones covered for the crimes of Officer Blevins and the CBP officers and suggested that policy was responsible for the actions of Officer Blevins.
147. On August 2, 2021 U.S. Magistrate Judge Kristin L. Mix demonstrated that she was a conspirator to preventing the enforcement of a United States statute, when acting like she could not clearly read the statutes listed in the document before her. The actions of Magistrate Judge Mix and Gallagher in concert with the person in the Clerk's office demonstrates a conspiracy to prevent the enforcement of a United States statute. The continued detention of Jaime Naranjo-Hererra demonstrate that force is being used to prevent the enforcement of the statute as well.
148. There is overwhelming evidence of conspiracy, collusion, and complicity to torture, terrorism, crimes against humanity and numerous other crimes, and judicial interference.

**E. The Trans-National Invariable Pursuit of the Object**

149. It is indisputably clear that there has been a pattern of punishment towards the Applicant and his daughters in the judicial system in Canada and the United States. Including a severe level of judicial interference in the Supreme Court of the United States by rogue elements which includes without limitation Clara Houghtelling, Michael Duggan and Redmond K. Barnes. The foregoing treason by way of conspiracy which includes terrorism and shielding the rogue agents of ICU located in Saskatchewan, Canada who are co-opting a legitimate financial institution to fund the Invariable Pursuit of the Object. This conspiracy includes judges in the Court of Queen's Bench for Saskatchewan, and the Court of Appeal for Saskatchewan participating in and shielding mortgage fraud. The Court of Appeal for Saskatchewan has openly declared that the Constitution of Canada has no validity for children or those whose political views oppose the government in direct opposition to the Charter.
150. The Court of Appeal for Saskatchewan declared that children are not persons and should not be afforded the right of habeas corpus.



151. The Invariable Pursuit of the Object can be traced through multiple courts in Canada and the United States. This includes the following actors without imitation, Justice R.W. Elson, Justice Barnes of the Federal Court of Canada, OWZW, Virgil Thomson, and Michael Griffin counsel for APEGS, Registrar Amy Groothius and her assistants, Justice J. A. Schwann, Kimberley A. Richardson, Clifford A. Holm, Lisa Silvester, Patricia J. Meiklejohn and Justice B.R. Hildebrandt, district court of Nevada Judge Jennifer Dorsey, Immigration Judge Glenn Baker.
152. U.S. Magistrate Judge Gordon P. Gallagher used fraud in order dated June 15, 2021 to conceal *documentation that contained evidence of complaints made to law enforcement of the criminally negligent representation of the AGMP guidance issued by the CDC and SHA; and crimes used to suppress its reporting.*
153. Immigration Judge Caley used fraud to conceal *documentation that contained evidence of complaints made to law enforcement of the criminally negligent representation of the AGMP guidance issued by the CDC and SHA; and crimes used to suppress its reporting.*
154. On September 21, 2021 Chief Judge Phillip A. Brimmer of the District Court of Colorado dismissed an action that presented evidence and supporting case law of treason. His overt actions are consistent with a conspiracy to prevent the enforcement of a United States statute. Treason can not be treated as a civil matter. Chief Judge Phillip A. Brimmer states “*Applicant does not allege that any arrests have been made or that the grand jury has returned an indictment.*” Included in the evidence is that there are open torture investigations in Canada, and that the evidence presented demonstrates that the actors in Canada and the United States are acting in concert. There is an obligation contained in article 5 of the Convention against Torture to prevent acts of torture and to “*take such measures as may be necessary to establish its jurisdiction over such cases where the alleged offender is present in any territory under its jurisdiction*”. The Convention against Torture does not require arrests to be made for an investigation to commence. The Convention against Torture permits the person who alleges torture to present their evidence for the purposes of conducting an investigation.

155. Chief Judge Phillip A. Brimmer called compelling evidence of torture, and treason “*frivolous*”, “*groundless and vexatious*” and threatened to punish the Applicant for complaining of the torture and attempting to report treason. Chief Judge Phillip A. Brimmer is a traitor to the United States, and an enemy of the Crown as he is supporting the treasonous actors in Canada.
156. The Applicant was obstructed from reporting torture, conspiracy to commit treason, terrorism, and from presenting evidence of treason with United States citizen Robert A. Cannon.
157. Compelling evidence in 20-1815 in the Supreme Court of the United States demonstrates that the actions of all of these actors are deliberately working in concert. The obstruction of the motion allowed for the furtherance of the torture of the Applicant and allowed the mismanagement of the COVID emergency to continue unreported. Redmond K. Barnes, case analyst at the Supreme Court tampered with evidence from the Supreme Court of the United States by the Applicant and sent them to Jaime Naranjo-Hererra. The five affidavits of the torture at the Sweetgrass MT point of entry, gives compelling evidence based on the testimony of the Applicant and the witnesses of the events.
158. These events demonstrate that there has been a prior demand for the duty both to the RCMP and the Court of Queen’s Bench for Saskatchewan, Court of Appeal for Saskatchewan, the Federal Court of Canada, the Department of Homeland Security, District Court of Colorado, United States Court of Appeals for the 10th Circuit, and the Supreme Court of the United States. The sheer number of complaints and evidence supplied proves that there has been prior demands and unreasonable delay.

The delay in question was been far longer than the process required. There was an obligation to protect the complainants from any ill treatment from the complaint of torture, and neither the Applicant nor his daughter Karis have had any protection from the ill treatment arising from the complaint, and left Karis in the care of persons complicit to the torture. The public has had an unreasonable delay from the hindrance of criminal negligence complaints.

The Applicant is not responsible for being tortured by the persons he complained to of being tortured and persecuted by. And he is not responsible for the courts and other parties committing mortgage fraud in the courts to further punish him and Karis. Karis is not responsible for the punishment that

she has received because of the political opinion of her father the Applicant. The public is not responsible for being victimized by criminal negligence.

The Attorney General of Canada has not provided any satisfactory justification for the delay by the RCMP, or for the Federal Court of Canada. The Court of Queen's Bench for Saskatchewan has provided no satisfactory justification, nor has the Court of Appeal for Saskatchewan. There has been no investigation of the torture, and all evidence supplied by the Applicant has been ignored by all of the aforementioned parties. Evidence has been provided by the Attorney General of Canada that incriminates the RCMP, SHA and the Court of Queen's Bench for Saskatchewan in the torture of the Applicant and his daughter Karis. There is no reasonable justification for delaying the investigation of criminal negligence complaints that have caused deaths of the public.

#### **V. NO OTHER ADEQUATE REMEDY IS AVAILABLE TO THE APPLICANT**

159. It is indisputably clear that the corrupt agents in the courts have denied lawful requests not to be tortured, persecuted, stop child trafficking and murdering the public and the RCMP have perpetrated a gross dereliction of duty that directly resulted in the vast majority of the suffering and the losses incurred by the Applicant, Karis her sister Kaysha F.N. Richardson and the public. The RCMP are the means by which Karis has been used to torture the Applicant, and the means by which Karis is being trafficked mortgage fraud and the treasonous, totalitarian orders of Justice R.W. Elson were issued. No other Court has examined the evidence and make a decision based on the facts and the law.
160. There is no other way to remedy these matters as this is a matter of precedent. Either the court gives remedy or military intervention by the United States and the latter option is not a reasonable way to obtain remedy.
161. The Unknown Registrars and Amy Groothius have thwarted all other attempts for Dale to exercise his rights and protect Karis from torture and being trafficked for the purposes of sexual and financial exploitation, and to protect the public from being murdered and deprived of their liberty. Without this motion it is probable that Dale will have more attempts made on his life and liberty, and the United States will send its military to put down the national security threat in Canada by force.

## **VI. THE ORDER SOUGHT WILL BE OF SOME PRACTICAL VALUE OF EFFECT**

162. The obvious nature of the obligation of the RCMP to stop the torture and to not be engaged in torture, mortgage fraud, bio-terrorism, treason child trafficking and numerous other crimes is blatantly obvious. The Registrar of Land Titles, nor rogue agents of the Courts not engaging in fraud is of practical value. The public not being subjected to criminal negligence is a clear example of practical value.
163. Stopping treason is of a practical effect, as is preventing a military intervention from the United States as that places innocent citizens at risk of being collateral casualties.
164. Upholding the Charter and not allowing corruption to flourish in the judicial system is of practical value.

## **VII. IN THE EXERCISE OF DISCRETION THERE IS NO EQUITABLE BAR TO THE RELIEF SOUGHT**

165. The Applicant has done nothing but attempt to assert his lawful right not to be tortured and be free from criminal activity directed towards him his daughters and the public by multiple state and private actors in Canada and the United States. In spite of the gross systematic criminal actions taken against him, the Applicant has not responded in any like fashion towards any of the state or private actors. He has only used legal means to avail himself of the child trafficking for the purposes of financial and sexual exploitation, torture, mortgage fraud, crimes against humanity and other grievous crimes he and the public are being victimized by. The torture of a child to suppress the reporting of crime that affects the public is not justifiable by any means. No equitable bar exists to the relief sought.
166. There is no equitable bar to relieving the murder of the innocent.
167. There is no equitable bar to upholding the Charter or stopping the torture of Black people using the courts.

## VIII. BALANCE OF CONVENIENCE

168. Torture is an extreme prejudice that must be remedied, irreparable harm has been done to the Applicant, and most importantly the child Karis, who has had irreparable harm done to her because of being trafficked for the purposes of exploitation and other gross criminal activity. An infant child who was deprived of a development that is rightfully hers to use her as an instrument of torture is sick, inhumane, disgusting, reprehensible, vile, tyrannical and disgustingly criminal and there is no other reasonable consideration, other than to immediately remove the effects of the torture which also includes returning the habitual residence that was taken to torture the Applicant and separate him from Karis.
169. The public has a right not to be subjected to crimes.
170. Torture to affect the family matter is unreasonable and should never be sanctioned as a means to punish a political dissident.
171. The Applicant has a right not to be punished for whistle-blowing crimes and must have the child trafficking and other crimes against him stopped and are well within the balance of convenience.

## CONCLUSION

172. Without this *Motion for Writ of Mandamus* granted, it will allow the extreme prejudice demonstrated by state actors in Canada and the United States to effectively use the courts to commit crimes and silence the Applicant, to violate the constitution, commit treason, and torture the Applicant and an innocent child. No family matter should be used as a means to murder members of the public, overthrow a government and cover terrorist activity.

### Relief Sought

173. This *Motion for Writ of Mandamus* and *Prohibition* is made for
1. An order to compel the Assistant Commissioner Rhonda Blackmore of the RCMP and/or any of her agents operating in the jurisdiction of Saskatchewan;  
  
to issue arrest warrants for every person involved in the torture, criminal negligence, child trafficking and other related complaints in Canada and the United States;

to remove Karis Kenna Nicole Richardson from the care of whomever she is with and deliver Karis to the Applicant or other such person as the Applicant shall decide, at a location to be determined by the Applicant, to comply with the Convention against Torture;

to seize the property located at 1292 95<sup>th</sup>, Street North Battleford, Saskatchewan, S9A 0G2 and arrest all parties involved in the mortgage fraud;

2. On order for the Saskatchewan Health Authority and the Ministry of Health to;

End all covid related mandates in the province of Saskatchewan effective immediately;

Remove the unscientific diagnosis associated with the torture of the Applicant;

Deliver all documentation relating to the Aerosol Generating Medical Procedures guidance at no cost to the Applicant

3. An order to compel the Executive Council of Saskatchewan to;

File and process the Application for Access for the Return of the Child Dated April 8, 2022;

4. An order to compel Amy Groothius to;

Place all communications between Dale J. Richardson on the court record;

Place all evidence and documents previously filed or attempted to be filed by Dale J. Richardson or any of his affiliates on the court record;

Recuse herself from any matter relating to Dale J. Richardson or any of his family members or affiliates;

5. An order to compel the Attorney General of Saskatchewan

to provide the Applicant with all the information requested in all of his access to information requests at no cost to the Applicant without any redaction;

to pay any and all costs associated with this motion, or any of the orders associated with it, and for the maintenance, insurance and any other cost of the property at 1292 95<sup>th</sup>, Street North Battleford until the resolution of the Appeal and any incidental matters associated with the matters subject to the mandamus and/or the appeal;

To pay the legal costs of Applicant incurred from the Attorney General of Saskatchewan failure to do the public duty required by the office of the Attorney General of Saskatchewan;

To pay the legal costs of the Applicant for any actions relating to this mandamus

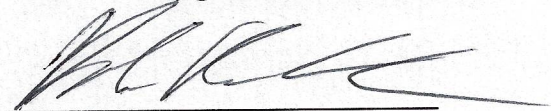
To pay the costs of a full report regarding the criminally negligent guidelines to the Applicant or other person that the Applicant shall decide.

2. An Order prohibiting Assistant Commissioner Rhonda Blackmore or any agent of the F-Division of the Royal Canadian Mounted Police from interfering with, harassing or torturing the Applicant; or attending any residence owned, occupied or regularly attended by the Applicant for any unlawful purposes and
3. An order prohibiting Jessica Karam from harassing, molesting, annoying, persecuting, torturing, interfering with the Applicant or trafficking his children;
4. An order prohibiting Jessica Karam from representing the public interests in this matter or any matter relating to the Applicant or his affiliates in the province of Saskatchewan;
5. An Order with dispensing with service and ordering electronic service for the Mandamus and CACV4048

ALL OF WHICH is submitted,

Sept 5, 2022

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## **LIST OF AUTHORITIES**

*Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment*

*Criminal Code of Canada*

*Canadian Victims Bill of Rights*

*The Constitution Act, 1982*

*United States Constitution*

*Declaration of Independence*

*28 U.S.C. § 455*

*18 U.S.C. § 3771*

*The Rome Statute of the International Criminal Court*

## CASES

*In re Grand Jury* (1886, DC Or) 11 Sawy 522, 26 F 749.

*United States v Morado* (1972, CA5 Tex) 454 F.2d 167, cert den (1972) 406 US 917, 32 L Ed 2d 116, 92 S Ct 1767

*United States. Bryant v. United States*, 257 F. 378, 1919 U.S. App LEXIS 2212(5<sup>th</sup> Cir. 1919)

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