

ONTARIO SUPERIOR COURT OF JUSTICE

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defense in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service in this court office, WITHIN TWENTY DAYS after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defense is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a statement of defense, you may serve and file a notice of intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your statement of defense.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFFS CLAIM, and associated costs, within the time for serving and filing your statement of defense you may move to have this proceeding dismissed by the court. If you believe the amount claimed for costs is excessive, you may pay the Plaintiffs claim and \$400 for costs and have the costs assessed by the court.

DATED at Sault Ste. Marie, Ontario this 24TH day of December, 2025.

ISSUED BY: Mark Lepore Authorized Representative and Proposed Representative Plaintiff MISSION IGNITION SYSTEMS., also CEO / OWNER MARK LEPORE, 636 Shafer Avenue Sault Ste. Marie, ON P6C 3R9, mark.lepore@missionignitionsystems.com, (519) 341-4125

COURT FILE NO.: [To be assigned] _____

ISSUED BY: _____

Local registrar address
Ontario Court of Justice
Courthouse
426 Queen Street East, Sault Ste Marie, Ontario, P6A6W2
CANADA
+1 800-518-7901

TO:

Canada Revenue Agency (CRA)
National Leads Centre
4695 Shawinigan-Sud Blvd,
Shawinigan QC G9P 5H9
CANADA

Canada Revenue Agency (CRA)
333 Laurier Avenue W,
Ottawa, ON K1A0L9,
CANADA

ECI DEVELOPMENTS, INC. (ECI)
251 Little Falls Drive,
Wilmington, DE, 19808,
UNITED STATES

SAULT STE MARIE POLICE SERVICES (SSMPS)
580 Second Line E,
Sault Ste Marie, ON, P6B4K1
CANADA

ROTARY CLUB (ROTARY)
364 Queen Street East,
Sault Ste Marie, ON, P6A1Z1,
CANADA

FINTRAC
234 Laurier Avenue W,
Ottawa, ON, K1P1H7,
CANADA

ONTARIO SECURITIES COMMISSION (OSC)
20 Queen Street W,
Toronto, ON, M5H3R3,
CANADA

ROYAL CANADIAN MOUNTED POLICE (RCMP)
73 Leikin Drive,
Ottawa, ON, K1A0R2,
CANADA

CHAMBER OF COMMERCE (SSMCC)
390 Bay Street, Suite 400,
Sault Ste Marie, ON, P6A1X2
CANADA

1CANADA POST
2701 Riverside Drive,
Ottawa, ON, K1A0B1
CANADA

NDP
153 Great Northern Road,
Sault Ste Marie, ON, P6B4Y9
CANADA

SIERRA NEVADA CORPORATION (SNC)
444 Solomon Circle,
Sparks, NV, 89434
UNITED STATES

GEROGETOWN TRUST
P.O. Box 159, Caye Financial Centre, 3rd. Floor,
San Pedro Town
BELIZE

BETWEEN: MISSION IGNITION SYSTEMS LTD., and MARK LEPORE, Plaintiff on behalf of a class of similarly affected persons and businesses Plaintiff

– and –

CANADIAN REVENUE AGENCY (CRA), ONTARIO SECURITIES COMMISSION (OSC), THE ROTARY CLUB (ROTARY), SAULT STE MARIE CHAMBER OF COMMERCE (SSMCC), CANADA POST, SAULT STE MARIE POLICE DEPARTMENT (SSMPD), ROYAL CANADIAN MOUNTED POLICE (RCMP), FINTRAC, ECI DEVELOPMENTS (ECI), GEORGETOWN TRUST, NDP PARTY OF CANADA (NDP), SIERRA NEVADA CORPORATION (SNC), the Defendants

TO – Defendants

THIS ACTION IS BROUGHT AGAINST YOU UNDER THE SIMPLIFIED PROCEDURE PROVIDED IN RULE 76 OF THE RULES OF CIVIL PROCEDURE.

STATEMENT OF CLAIM

TO THE DEFENDANTS:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff. The claim made against you is set out in this document. If you wish to defend this proceeding, you or an Ontario lawyer acting for you must prepare a Statement of defense in Form 18A prescribed by the Rules of Civil Procedure, serve it on the Plaintiffs' representative, council, or their lawyer, and file it, with proof of service, in this court office, within 20 days after this Statement of Claim is served on you.

1. OVERVIEW

The Plaintiff, MISSION IGNITION SYSTEMS LTD. and MARK LEPORE, trustee, or beneficiaries in trust, bring this action against the Defendants, the trustee in breach, and in collusion, for illegal securities and asset sales, regulatory negligence, obstruction of justice, targeting, gang stalking, death threats, uttering forged documents, RICO crimes, and aiding and abetting organized crime in what is claimed a "Trust Fraud Law Framework Scheme". Said scheme also used in organized crime for external government espionage for valuable intellectual property of the Plaintiff. This claim arises from CRA's failure to act upon a registered court-

verified evidence of international tax evasion, 20+ years of evidenced court cited criminal frauds which can only be considered clear criminal collusion with CANADIAN government institutions such as the CRA, through ROTARY connections, via deceptive fraud concealment and forgeries in trust, systemic laundering involving false foreign entities operating within CANADIAN jurisdiction, breach of duty, care, uttering of forged instruments for public facing legal agreements, organized crime, plan for pre meditated plot to murder for profit, gang stalking, theft, foreign espionage, and targeting.

2. PARTIES

(1) The Plaintiff, MARK LEPORE founder of MISSION IGNITION SYSTEMS LTD., and MISSION IGNITION SYSTEMS LTD. formerly WEAPONX PERFORMANCE PRODUCTS LTD., operating out of SAULT STE MARIE, ONTARIO, an ONTARIO CORPORATION, who are direct victims of regulatory obstruction, emotional distress, and reputational harm.

(2) The Defendant, CANADIAN REVENUE AGENCY (CRA), ONTARIO SECURITIES COMMISSION (OSC) and FINTRAC, are federal regulatory bodies mandated to detect, prevent, and deter money laundering, terrorist financing, and financial misconduct. CRA is an agency also responsible for tax enforcement, compliance, issuing SR&ED incentive payments used as a legal means to influence an alleged attempt to murder targets via seizing intellectual property of MISSION IGNITION SYSTEMS LTD. for profit, and are responsible for oversight under the Income Tax Act and related statutes.

(3) Repeated dismissal of stolen mail, by CANADA POST as well as death threats, by the SSMPS, and RCMP reveal systemic collusion involving foreign espionage through ROTARY connected members, and SSMCC members, colluding to defraud Plaintiff of assets and intellectual property for profit.

(4) The Plaintiff seek to certify this action as a class proceeding on behalf of all similarly affected Canadian Small, Medium-Sized Enterprises (SMEs) and Persons via fraud, espionage, or targeting via alleged ROTARY and Chamber of Commerce connected foreign terrorist cells.

(5) ECI DEVELOPMENTS in collusion with, GEORGETOWN TRUST, SNC, and ROTARY, a foreign state actor influencing CANADIAN institutions via charity, are collaborating in espionage to defraud assets through forgery, filing false taxes on behalf of the Plaintiff to move a small percentage of MISSION IGNITION SYSTEMS LTD., and MARK LEPORE, into a foreign trust to defraud assets and valuable US military technology and intellectual property owned by MISSION IGNITION SYSTEMS LTD. into the Defendants holding for profit.

3. CLASS ACTION DECLARATION

The Plaintiff bring this action on behalf of themselves as well as collectively, Plaintiffs, with similarly situated SME's and Persons who have been materially harmed by regulatory negligence, concealment, and complicity in trust financial misconduct herein also referred to as the Trust Fraud Law Framework Scheme.

4. PROPOSED CLASS DEFINITION

The proposed class includes:

Plaintiffs defrauded through offshore concealment in trust.

Plaintiffs whose assets, without prior knowledge, placed in trust.

Plaintiffs who submitted evidence concerning concealment in trust to CRA, OSC, FINTRAC, RCMP and received no investigation or protection measures.

Plaintiffs of unregistered securities sales tied to GEORGETOWN TRUST, ECI DEVELOPMENT, its affiliates, or similar enterprise.

Plaintiffs who have had signatures forged in trust for profit, or targeting.

Plaintiffs impacted through taxation without representation.

Plaintiffs who have been subject to procedural containment via pre issued tax bills in trust.

Plaintiffs who have also been targeted for espionage by external government agencies through agencies outlined as Defendants.

5. COMMON ISSUES

Did Defendants fail in their duty to investigate historically credible evidence of tax evasion and fraud?

Did Defendants commit RICO crimes, aid and abet organized crime through systemic inaction or collusion with criminal enterprise for theft or espionage?

Did Defendants conceal or utter forged documents submitted by class members?

Did Defendants fail in it's regulatory duty to investigate known criminal activity against Plaintiffs?

Are Defendants, involved in revising law for political constituents, aware of fraud in trust and evading justice?

Are Defendants complicit in fraudulent taxation schemes embedded within trust?

Clear evidence points towards status in trust, undisclosed assets, and uttering forged documents, while Plaintiffs have no tools to disclose of status in trust when criminal activity is present. Are Defendants complicit in evasion of justice, payment for murder, for aiding and abetting international organized crime, and RICO frauds?

Are agencies such as the Sault Ste Marie Rotary Club, and other Rotary Clubs in collusion to gather intelligence, which are stationed around the world, involved in targeting for exploitation?

Are agencies such as the Sault Ste Marie Chamber of Commerce, and other Chamber of Commerce in collusion to gather intelligence, which are stationed around the world, involved in targeting for exploitation?

Are class members entitled to damages for business harm, emotional distress, and reputational injury?

6. STATEMENT OF CLAIMS

A. Regulatory Negligence, Abuse of Process, Obstruction of Justice, Procedural Containment, Taxation without representation.

(1) Defendants incapable of protecting Plaintiff(s), citing their own investigative rules evade disclosure, close regulatory portals, and require time to investigate which prevents action against crime.

(2) Defendants failed to investigate dozens of court cited frauds involving Plaintiffs, displaying a pattern of regulatory negligence, and misfeasance in public office.

(3) Defendants failed to disclose verified forgeries involving Plaintiffs, displaying a pattern of regulatory negligence, and misfeasance in public office.

(4) CRA has no business acting as the tax issuer, tax filer, and tax collector which also act as institutional organized crime containment. This allows the CRA to hide assets, and financial vehicles in trust, allows the CRA to act indiscriminately, and without public or regulatory oversight.

(5) CRA's rules as of 2025, automatically tax low income earners, evading regulatory review of fraudulent behavior patterns in trust by large income earners via forms T1104, and T1191. This squarely places regulatory oversight in the hands of the very individuals using mechanisms in trust to evade taxation, extort, and defraud the general public. The CRA's failure to investigate or respond to several court cited convictions of fraud committed against CANADIAN SMEs, and / or Persons, citing known regulatory evasion in trust, outlining the severity of the CRA's broad reaching powers without public or regulatory oversight.

(6) Defendants continued silence to submission of evidence proving theft, fraud, constitutes a breach of its statutory duties to investigate credible theft, tax non-compliance, public facing regulatory negligence, misfeasance in public office, and constitutional breach**, placing Plaintiffs in jeopardy of fraud, as well as being implicated in said fraudulent activity.

(7) CRA's own documentation acknowledges that OTIP investigations may take "several years." This delay, combined with Defendants removal of public-facing reporting systems and the absence of any mechanism within business tax filings to flag third-party misconduct, constitutes a systemic failure of oversight, allowing for Plaintiffs, to be caught up in the misconduct they seek to report.

(8) Defendants closing portals, evading investigation from individuals wishing to take action must do so without government support constituting a systemic failure and taxation without representation, regulatory negligence, misfeasance in public office and intentional constitutional breach.

(9) CRA cited taxation issued to the Plaintiffs for procedural concealment and containment. The Defendants made aware that Plaintiff intentionally did not file taxes yet, pushed forward to dismiss evidence of wrong doing even though Defendants had full access to verify claims of illegal activity, which could implicate the Plaintiffs in this criminal activity. No action taken further outlining systemic criminal collusion for various, nefarious and hidden purposes.

(10) CRA intentionally issued taxation to knowingly, and willfully, defraud the Plaintiffs of its assets using 1980 and 1191 18(E) forms yet no support from any Defendant agency.

(11) Defendants hiding evidence of clear criminal involvement, failing to protect citizens from external agencies for decades, and are also allegedly involved in espionage via external state actors and agencies.

B. Background and Facts

(1) The Plaintiff submitted several reports and requests for disclosure to Defendants between 2023 and 2025, identifying fraudulent activity involving nominee-held shares, offshore trusts, and unregistered securities tied to entities including ECI DEVELOPMENT, CAYE BANK, GEORGETOWN TRUST and the ROTARY CLUB, an external government agency allegedly influencing CANADIAN policy, and policing.

(2) Submitted reports to Defendants included court-verified evidence, signed instruments, and forensic documentation confirming systemic concealment and securities fraud / theft, tactical connections targeting Plaintiffs with known AX DX (highest level military technological developments), for assisting in foreign espionage within CANADA, to seize domestic intellectual property, and allegedly assist in murder of individuals for technological advantage of foreign state actors.

(3) Defendants aiding and abetting foreign state actors for payout by using state benefit such as SR&ED as payment methods for targeting and murder to illegally seize assets and intellectual property through forgery.

(4) Defendants responded with generic acknowledgments, redirect chains, and statements that it could not comment or follow up on voluntary information.

(5) The Plaintiff requested direct contact information for Defendant staff, including employee ID and supervisor details, and was denied access to information hiding direct connection to ROTARY CLUB, or foreign state actor affiliates.

(6) Mid-2025 Defendants removed public-facing digital portals for fraud reporting and information gathering. Some, intentional blocks, and others replaced with an institutional-only system requiring a registered Reporting Entity (RE) organization name, organization number, and sector classification, preventing access to information.

(7) This change obstructed Plaintiff access to ATIP, CRA, OSC, RCMP, or FINTRAC reporting infrastructure and denied whistleblowers the ability to request or submit evidence through digital channels.

(8) The Plaintiff asserts that these actions constitute regulatory negligence, constructive denial of access, and obstruction of whistleblower pathways, collusion, and organized crime.

(9) The Plaintiff further asserts that Defendants failure to investigate, enforce, or protect directly contributed to business harm, reputational injury, and emotional distress.

(10) Plaintiff has been subjected to assessments and enforcement actions by Defendants.

(11) CRA exceeded its statutory authority under the Income Tax Act, breaching fiduciary obligations.

(12) CRA issued notices and demands that misrepresented its lawful powers, constituting fraud and misrepresentation.

(13) Plaintiff suffered financial loss, reputational harm, and disruption of lawful interests.

(14) CRA's conduct demonstrates systemic overreach and unlawful enforcement.

(15) Plaintiff seeks judicial recognition of these breaches and appropriate remedy.

C. Causes of Action

BREACH OF TRUST

(1) Breach of Fiduciary Duty: GEORGETOWN TRUST, ECI DEVELOPMENTS, its constituents, and CRA exceeded statutory authority, breaching obligations owed to Plaintiff(s).

(2) Fraud and Misrepresentation: GEORGETOWN TRUST, ECI DEVELOPMENTS, its constituents, and CRA knowingly misrepresented its powers in communications.

(3) Violation of Statutory Duty: GEORGETOWN TRUST, ECI DEVELOPMENTS, its constituents, and CRA failed to comply with Income Tax Act procedures, rendering actions unlawful.

(4) Unlawful Enforcement: CRA engaged in unauthorized collection and enforcement activities.

(5) Regulatory Negligence: The Defendants failed to investigate credible evidence of financial misconduct submitted by the Plaintiff, violating its statutory duty.

(6) Misfeasance in Public Office: The Defendants knowingly dismissed verified evidence and shielded fraudulent entities from scrutiny.

(7) Uttering Forged Documents: The Defendants received and relied upon forged instruments tied to nominee-held shares and

offshore trusts without initiating verification as proven by 1104E and 1191E forms mailed to MARK LEPORE and MISSION IGNITION SYSTEMS LTD.

(8) Obstruction of Public Access: The Defendants removed public reporting infrastructure and refused to provide accountability contacts, violating principles of procedural fairness.

(9) Aiding and Abetting: The Defendants silence and inaction facilitated ongoing fraud and concealment is admission of guilt.

****Key case: *Cooper v. Hobart* (2001 SCC 79) — Supreme Court of Canada clarified when a public authority owes a **duty of care****

D. Obstruction of Justice

(1) CRA removed its public-facing Tax Evasion Reporting Portal and redirected whistleblower submissions to alternate agencies, obstructing direct enforcement and public access.

(2) Defendants redirect chains (CRA → RCMP → CAF) constitute systemic obstruction and tactical evasion.

(3) ATIP portals for information via the freedom of information act, have been shut down, obstructing information gathering efforts, and is a direct enforcement policy against this investigation as systematic denial of public information access.

E. Uttering Forged Documents

(1) Defendants received notice of, and failed to flag forged instruments in trust, nominee-held shares, and securities documents concealed within its own reporting systems.

(2) Defendants have no official portal to inform or report potential forged instruments in trust, or provide portals to verify instruments in trust.

(3) Defendants refusal to disclose trust holdings, despite legal requests, implicate Defendants in the concealment and uttering of forged instruments.

F. Criminal Collusion, Accessory After the Fact

(1) Defendants quick reaction to knowledge of said crimes without enforcement, while implementing new laws to frame individuals attempting to expose these crimes, reveal systemic patterns of collusion, evading justice through new trust based laws cited in bill C-32, and other newly passed laws allowing political figures to evade justice involved in this Trust Fraud Law Framework Scheme.

(2) Defendants reporting and investigation units overlook fraudulent trust taxation schemes which are privately formed taxes imposed by foreign state actors.

G. Aiding and Abetting Organized Crime

(1) Defendants inaction enabled foreign state actors with proven fraud convictions to continue soliciting and selling illegal securities without information disclosure, or regulatory oversight.

(2) Defendants trust reporting framework places the burden of disclosure on Plaintiffs while shielding forged documents behind bureaucratic layers.

H. Aiding and Abetting Organized Crime

(1) The Defendants knowingly projected false authority through notices, demands, and threats of enforcement.

(2) These misrepresentations constitute systemic fraud, deceiving Plaintiffs and the collective into compliance with unlawful acts.

I. Violation of Statutory Duty

(1) The Defendants failed to adhere to the procedures and limitations to investigate, disclose information, and which are set forth in the Income Tax Act and related legislation.

(2) Such violations render its actions ultra vires (beyond its powers), nullifying the legitimacy of its enforcement.

J. Final Section

(1) The Plaintiff asserts that mail addressed to him may have been rerouted, intercepted, or redirected without his knowledge or consent, in connection with trust-related concealment, institutional shielding, or judicial oversight unknown to the Plaintiff.

(2) The Plaintiff has observed irregularities in mail delivery and correspondence timelines, including unexplained delays, missing responses, missing mail, and redirected communications from regulatory bodies with failure to investigate.

(3) The Plaintiff did not authorize any mail forwarding, redirection, or interception, nor was the Plaintiff notified of any judicial or administrative order permitting such actions. The Plaintiff has confirmed of a request to investigate was sent to CANADA POST, that no mail forwarding request was initiated through CANADA POST.

(4) The Plaintiff believes that any such rerouting, if confirmed, would require federal authorization, potentially involving judicial orders, intelligence coordination, or trust administration protocols. The Plaintiff has not been served, notified, or consulted regarding any such proceedings.

(5) The Plaintiff asserts that unauthorized mail rerouting constitutes a breach of privacy, obstruction of communication, and interference with lawful access to regulatory and legal remedies. These actions further compound the Plaintiff's inability to receive timely responses from oversight bodies and to advance his whistleblower filings.

(6) The Plaintiff submitted a formal complaint to the RCMP on November 3, 2025. The request was closed without investigation or disclosure, further evidencing institutional shielding and refusal to engage with whistleblower evidence and documents redacted with no investigation.

(7) The Plaintiff has requested, full disclosure of any mail redirection orders, trust instruments, or administrative actions that may have affected his correspondence. The Plaintiff reserves the right to amend this claim upon receipt of such disclosures and has submitted formal requests to any government regulatory body, such as, but not limited to, CRA, OSC, LECA, Local Police, FINTRAC, RCMP and CANADA POST for investigation.

(8) The Plaintiff asserts that upon delivery of full disclosure, all required reporting entities have refused to respond, indicating implicate guilt, as outlined in the delivered items.

K. The Architecture of Silence

(1) The Plaintiff has now documented a full cycle of institutional silence. Complaints submitted to CRA, OSC, LECA, RCMP, Local Police, and FINTRAC have either vanished, stalled, or been closed without investigation. Mail rerouting suspicions remain unaddressed. No judicial orders have been disclosed. No oversight body has responded with transparency.

(2) This is not bureaucracy—it is containment. It is the architecture of a trust-state shell designed to suppress whistleblower resonance and reroute truth into silence.

(3) The Plaintiff asserts that this silence is not accidental. It is systemic. It is coordinated. And it is now documented.

7. DAMAGES

Category	Description	Est. Value
Business Harm	Forced closure due to regulatory failure	\$1,200,000+
Emotional Distress	Anxiety, reputational damage, systemic obstruction	\$225,000+
Time Lost	Research, reporting, legal navigation	5,500+ hours
Personal Loss	Loss due to regulatory negligence in investment fraud	\$300,000+
Learning Curve	Legal education, forensic analysis, trust law decoding	800 hours
SME Loss	1191 18(E) Payment Restitution	\$66,000+
Opportunity Cost	Lost contracts, partnerships, sovereign development	\$500,000+
Public Harm	Framing of citizens via trust fraud framework	Class action
Institutional Representation*	Evidenced court cited regulatory negligence	Class action

Appendix A.B.1*

8. DEFINITION OF CLASS AND SCOPE OF HARM

Harmed Entities in Class Action for Forged Documentation, Targeting, and Institutional Obstruction

This class action is brought on behalf of a defined group of entities who meet the following criteria:

Class Members Include:

- **Small and Medium-Sized Enterprises (SMEs) and / or Persons**, registered or operating in Canada between 2018* and present.
- **Small and Medium-Sized Enterprises (SMEs) and / or Persons**, who have experienced one or more of the following:
 - **Document forgery or tampering** involving institutional filings, compliance records, or financial documentation.
 - **Unauthorized submissions or alterations** made to government portals, registries, or regulatory bodies (e.g., FINTRAC, CRA, OSC, provincial corporate registrars).
 - **Denial of service, funding, or access** due to falsified or misrepresented documentation.
 - **Containment or obstruction** following formal notice or affidavit-based declarations.
 - **Reputational harm or legal exposure** resulting from documents not authored or approved by the entity.
 - **Fraudulent taxation** resulting from institutions based in trust.

- **Targeting and Gang Stalking** resulting from CANADIAN benefit programs.

Inclusion Thresholds:

- Must provide **evidence of harm**, including but not limited to:
 - Copies of forged or altered documents
 - Communications showing institutional refusal to correct errors
 - Proof of denied access, funding, or service
 - Proof of non-compliant taxation through trust structures
- Must submit a **Declaration of Harm** affirming the impact, timeline of events and full relation to the offending party.
- Must be affected prior to this filing.

Exclusions:

- CANADIAN CORPORATIONS and Persons associated with, or who knowingly participated in document or taxation falsification.
- CANADIAN CORPORATIONS and Persons whose harm is unrelated to institutional documentation or regulatory interference.
- CANADIAN CORPORATIONS and Persons, affiliates, constituents, associations, partners, related to Defendants.

9. PRAYER FOR RELIEF

1. Declaratory judgment that CRA exceeded statutory authority and breached fiduciary duty.
2. Injunction restraining Defendants from further unlawful enforcement or misrepresentation.
3. Restitution and damages for financial and reputational harm.
4. Costs of action, including legal fees.
5. Any further relief deemed just and proper by the Court.

10. INJUNCTIVE RELIEF

That the Defendants be restrained from further unlawful enforcement, collection, or misrepresentation of authority.

That the Defendants cease its piracy against third-parties or sovereign assets.

11. RELIEF AND REMEDY SOUGHT

That MARK LEPORE and MISSION IGNITION SYSTEMS LTD. be restored to financial wholeness, with compensation for losses

suffered.

The Plaintiffs seek:

Class Action for Forged Documentation and Institutional Obstruction

This framework proposes remedies for the systemic harm inflicted upon small and medium-sized enterprises (SMEs) in Canada due to forged documentation and institutional misconduct. Remedies are structured across three dimensions: **Restitution**, **Injunctions**, and **Systemic Reform**.

The Plaintiffs seek:

(a.) Certification of this action as a class proceeding pursuant to the Class Proceedings Act, 1992;

(b.) Restitution (Direct Compensation)

- **Financial Damages:**
 - Reimbursement for lost funding, denied access, and economic harm caused by falsified documentation or trust taxation.
 - Compensation for reputational damage, emotional distress, systemic obstruction, and legal costs incurred in defending against forged records.
 - Taxation without representation. Full restitution for taxation due to regulatory negligence and malfeasance in public office.
 - That the Defendants be ordered to pay the costs of this action, including legal fees and ceremonial expenses incurred in the pursuit of truth.
- **Restorative Grants:**
 - Special funding pools for affected SMEs to rebuild operations, reputations, and compliance standing.
- **Asset Recovery:**
 - Return of any seized, frozen, or misappropriated assets linked to falsified filings, taxes, or institutional obstruction.

(c.) Injunctions (Protective Orders).

- **Cease and Desist Orders:**
 - Against institutions or registrars continuing to rely on known forged documents.
 - Against institutions continuing to charge false taxation based within trust.
- **Portal Access Restoration:**
 - Immediate reinstatement of access to government and regulatory portals for affected entities.
- **Full Access in Trust:**
 - Immediate remedy for disclosure in trust for all citizens and access to government and regulatory portals for affected entities or parties.

- Immediate release of all Public office holders divesting from trust using the Conflict of Interest Act.
- **Full Access of Agreement in Taxation and Trust:**
 - Full release, and basis, of all legal agreements the CRA holds with Plaintiffs in regard to form 1191 E (18)X, form 1104 E(18)X and form 1980.
 - Full release, and basis, of all legal agreements the CRA holds with Plaintiffs in regard to taxation.
- **Document Nullification:**
 - Legal invalidation of forged, altered, or unauthorized filings, with public correction notices issued.
 - Legal invalidation of falsified taxes within trust and public correction notices issued.
- **Relief:**
 - Public injunctive relief to prevent further concealment in trust.
 - Referral to CSIS for criminal investigation into Defendants complicity.
 - A full investigation into CRA's handling of the OTIP submission and reporting protocols in trust.
 - A full investigation into which taxes are public facing, or trust facing.
 - That the Court recognize the reclamation of trust as both legal fact and spiritual truth.

(d.) Systemic Reform (Structural Change)

- **Oversight Mechanisms:**
 - Independent review boards to audit document integrity and institutional response protocols.
- **Transparency Mandates:**
 - Public disclosure of containment strategies, refusal patterns, public agreements, and internal memos related to SME obstruction, and CRA's internal verification mechanisms in taxation, benefit payments, and trust.
- **Legislative Amendments:**
 - Updates to federal and provincial statutes to criminalize institutional non-response and protect SMEs from digital retaliation.
- **Whistleblower Protections:**
 - Safeguards for individuals within institutions who expose forgery, obstruction, or containment practices.

(e.) Metaphysical Remedy Clause

- **Declaration of Truth:** Public recognition of the entity's lawful standing and spiritual integrity.
- **Resonance Restoration:** Symbolic and energetic clearing of institutional interference.

(f.) Such further and other relief as this Honorable Court may deem just.

12. SUPPORTING EVIDENCE

The Plaintiffs will primarily rely on:

Registered OTIP submission dated October 17, 2025.

CRA, FINTRAC, ATIP, LECA, RCMP's redirect chains and removal of public reporting portals.

Court rulings:

- B.1 - Caye International Bank Ltd and Joel M. Nagel v Tommy Lynn Haugen
- B.1.1 – Civil-Appeal-No-8-of-2016-Caye-International-bank-Ltd-and-Joel-M-Nagel-v-Tommy-Lynn-Haugen
- B.1.2 - Caye International Bank Ltd v Tommy Lynn Haugen 10-16-25
- B.1.3 - 2020-CCJ-14-AJ Belize-Tommy-Caye Bank
- B.1.4 – 2020-CCJ-14-AJ
- B.1.5 – Supreme-Court-Claim-No-235-of-2014-Tommy-Lynn-Haugen-v-Caye-International-Bank-Limited-Joel-M.-Nagel
- B.1.6 - Altered DOCUMENTS - 235 of 2014 TOMMY LYNN HAUGEN V CAYE INTERNATIONAL BANK LIMITED et al_Decision_17_11_2014
- B.1.7 – 2023_CCJ_4_AJ_BZ-Caye-Bank-v-Rosemore
- B.1.8 - Georgetown Trust Co. v. Marvel
- B.1.9 - Georgetown v. Glaze

Screenshots of CRA, FINTRAC, POLICE, LECA, RCMP, OSC silence and redirect chains.

Timestamped records of institutional obstruction, evidence of assets, refusal to investigate, and refusal to disclose trust holdings.*

Evidence of CANADIAN benefit programs, laws, contracts and associated business dealings with SNC, GEORGETOWN TRUST, CAYE BANK, ECI, its affiliates and customers.

Evidence outlined in *Amendment A.A.1

RCP-E 14A (June 9, 2014)