

## A.A.1 - AMENDMENT STATEMENT OF CLAIM (EXCERPT)

### I. Parties

(1) The Plaintiff, Mark Lepore , is a private investigating entity on behalf of MARK LEPORE and the founder of MISSION IGNITION SYSTEMS LTD., a CORPORATION registered in ONTARIO, CANADA.

(2) The Defendant, CRA (CANADIAN REVENUE AGENCY ), is a federal regulatory body mandated to detect, prevent, and deter money laundering, terrorist financing, and financial misconduct.

### II. Background and Facts

(3) The Plaintiff submitted several reports to CRA, OSC, FINTRAC, RCMP between 2023 and 2025, identifying fraudulent activity involving nominee-held shares, offshore trusts, and unregistered securities tied to entities including ECI DEVELOPMENT, CAYE BANK, AND GEORGETOWN TRUST.

(4) These reports included court-verified evidence, signed instruments, and forensic documentation confirming systemic concealment and securities fraud.

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

(6) The Plaintiff requested direct contact information for FINTRAC, OSC staff, including employee ID and supervisor details, and was denied access to this information.

(7) In mid-2025, CRA, RCMP, OSC, ATIP and FINTRAC removed its public-facing digital portals for fraud reporting and replaced it with an institutional-only system requiring a registered Reporting Entity (RE) organization name, FINTRAC organization number, and sector classification.

(8) This change obstructed public access to CRA's, OSC's, RCMPs, or FINTRAC's reporting infrastructure and denied whistleblowers the ability to request or submit evidence through digital channels.

(9) CRA's neglected to respond to submissions, FINTRAC's response stated that it could only receive voluntary information via fax or mail and could not follow up or comment on any submissions, creating a regulatory dead-end, as do LECA, OMBUDSMAN, CRA, and OSC submissions.

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

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

### III. Causes of Action

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

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

(14) Uttering Forged Documents: The Defendant 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.

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

(16) Aiding and Abetting: The Defendant's silence and inaction facilitated ongoing fraud and concealment.