

Ontario Court of Justice

APPLICATIONS

Pursuant to S. 699 and S. 520 of the *Criminal Code* of Canada

Crown v. Deirdre Moore, Deirdre A Moore, Deirdre Ann Moore

Date of filing: 13-FEB-24

Applicant: Accused Deirdre Moore ("Moore")

Respondent: Crown, via prosecutor Malcolm Savage ("Crown")

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APPENDIX A

Moore brings this Application for orders for third-party records due to their relevance in her criminal matters including, but not limited to:

A. SPECIFIC CHARGE

1. The third-party records requested are relevant due to the specific charges being actively pursued by the Crown; namely, **S. 733.1(1) Breach of Probation ... without reasonable excuse.**
2. As noted in the Crown's disclosure, the charge stemmed from Moore:
 - a. attending on 20231216 the \$2,000,000 matrimonial home at 1244 Lampman Crescent, Ottawa, ON, K2C 1P8 (see **Tab 1**) of which she remains:
 - i. co-owner (see **Tab 2**) and
 - ii. co-mortgagee (see **Tab 3**) and
 - b. having "no fixed address" during the winter (see **Tab 4**),

as she entered her **11th year** attempting to divorce her estranged husband Jonathan Kiska ("Kiska", see **Tab 5** and partial details at <https://pfi.rocks/organized-crime/vis/john-kiska>).
3. Accordingly, it is important for Moore's full defence (and/or consideration of mitigating factors upon sentencing) for the court **to understand the reasons why Moore attended her property in the first instance.**
4. Evidence provided by witnesses noted in **Appendix B** will demonstrate that:

- a. Moore's 20220524 Probation Order:
- i. resulted from over three years of organized crime committed against her,
 - ii. was illegally-obtained via extortion and
 - iii. remains unlawful pursuant to multiple sections of the *Criminal Code* of Canada. (See **Tab 6**).
- b. Moore had exhausted every other reasonable means to:
- i. move her divorce from Kiska forward,
 - ii. end her orchestrated childlessness, poverty and homelessness.
- c. Moore has no history of violence, use of weapons or drugs: she does, however, have plenty of history of being *falsely accused* of crime, being mentally ill and/or dangerous by Kiska and his *many* accomplices including, but not limited to, those employed by:
- i. the Ottawa Police Services Board ("OPSB")¹,
 - ii. Ottawa's Crown Attorney's Office ("OCA")²,
 - iii. Ontario's Superior Court of Justice ("SCJ"),
 - iv. the Children's Aid Society of Ottawa ("CAS")³,
 - v. Ontario's Office of the Children's Lawyer ("OCL") and

¹ See mounting evidence against OPSB and their legal representation, Borden Ladner Gervais LLP., in the documents filed for CV-23-91267 published at <https://pfi.rocks/the-darkumentary>.

² See mounting evidence against Ottawa's OCA and their accomplices at Ontario's Ministry of the Attorney General at <https://pfi.rocks/mummygate>.

³ See evidence of crime and tort committed by the CAS during 20211109 CAS appeal stored in dropbox account at: https://www.dropbox.com/sh/nfcq227ei0tdbwr/AAA1-dK7y4t2cXVnSoucsv8_a?dl=0 with the Exhibit Book Table of Contents at **Tab 7** and excerpt from scandalous decision at **Tab 8** AND/OR review the 33-page civil action, Moore v CAS" stored at <https://pfi.rocks/organized-crime/entity/cas/cv-23-00061855>.

- vi. multiple career-criminal lawyers.

Note that Kiska leveraged corruption which has infiltrated *all parties* listed at paragraph 4 (b) above to circumvent Canada's *Divorce Act*: Moore and Kiska are **still married** and the *Divorce Act* has federal paramountcy over the CAS's provincial act, the *Child, Youth and Family Services Act* ("CYFSA"). Kiska was simply avoiding the *extensive damages* which Moore was permitted to seek during their divorce as detailed in decision at:

<https://www.canlii.org/en/on/onsc/doc/2017/2017onsc6872/2017onsc6872.pdf>

and his *court-enabled fraud* continues to this day as evidenced in decision at:

<https://www.canlii.org/en/on/onscdc/doc/2022/2022onsc152/2022onsc152.pdf>.

- d. Moore's alleged "breach of probation" was not criminal in nature; but, a response to incompetence, ignorance, mockery and/or an abuse of authority ... as well as a cry for help.

B. CIRCUMSTANCES SURROUNDING THE ALLEGED OFFENCE

- 5. On 20231216, Moore had *just* arrived back in Ottawa following over 15 months attempting to:
 - a. transfer and/or change her 20220524 Probation Order⁴, so she could communicate with Sean & Cate;
 - b. receive consent from Kiska so she could communicate with Sean & Cate;

⁴ As recommended by former defence attorney Alyssa Jervis (see work-in-progress file at <https://pfi.rocks/organized-crime/vis/alyssa-jervis>) who provided false information to Moore in order to get her to "agree" to not taking her charges to trial and, apparently, neglected to forward to the Crown and the court her 2022 "Pre-sentencing Package" or argue for an absolute discharge as agreed.

- c. move her divorce forward so she could:
 - i. put an end to Kiska's domestic violence, spousal and child abuse,
 - ii. access the hundred of thousands of dollars she is owed in retroactive spousal support and occupational rent and
 - iii. end her orchestrated childless, homeless poverty; and,
 - d. perfect SAQOTU Inc.'s whistle-blowing/advocacy webiste, www.pfi.rocks, so Kiska and his criminal accomplices⁵ would be exposed and disassembled.
6. She was forced to return by Niagara Health⁶ and the Niagara Regional Police Service⁷ who both refused to assist with the reporting, arrest or detention of Kiska or any of his accomplices.
 7. Injured, travelling with over 250 pounds of luggage and without the funds to pay for accommodation, she had no choice but to try, again, to report the perpetual crime-in-progress to OPSB.
 8. As 9-1-1 refused to take her complaint seriously and, in fact, threatened to charge her with violating S. 430 of the CCC, she decided to attend her matrimonial home confident that she would be able to speak with a legitimate investigator following her likely arrest.

C. NATURE AND SCOPE OF THE INVESTIGATION

9. Despite Moore asking Officer Michael Cook twice if she could file a police complaint, he refused to discuss it (see disclosure); and, Officer Sovan Try outright refused to interview her stating: "You weren't supposed to be at the house! I'm done my investigation!"

⁵ See details regarding Ottawa's #MinicipalMafia on X.com at https://twitter.com/search?q=%23MunicipalMafia&src=typed_query&f=live

⁶ See work-in-progress file at <https://pfi.rocks/organized-crime/vis/janice-van-kampen>

⁷ See evidence-laden Civil Action 23-61902 at <https://pfi.rocks/organized-crime/entity/nrps/cv-23-00061902>

10. In addition to neglecting to determine whether or not Moore had a reasonable excuse for

“breaching” the order, OPSB added four additional bogus charges:

- a. one for criminal harassment,
- b. an additional count of breach of probation and
- c. two for disobeying an expired, forged court order.

See order contained in the disclosure package vs the original at **Tab 9**.

11. The Crown is now down to one charge; however, there has still been little-to-no investigation; sadly, this must now be “investigated” by the court.

12. Not only has the Crown continued to maliciously prosecute Moore for her not-a-crimes, prosecutor Malcolm Savage stated to the court that upon conviction “they would not be seeking additional time but a Not Criminally Responsible opinion!”⁸

13. This tactic of ignoring exculpatory evidence is not unlike that used by the Crown in 2019 when they attempted to charge Moore with Break & Enter on her matrimonial home when she:

- a) had *no criminal intent* and
- b) was merely attempting to protect her children from further abuse following five months of their father being in contempt of a *CYFSA* court order.

D. DEFENCES TO BE PUT FORWARD

14. Beyond provocation, Kiska and his accomplices are guilty of violating S. 429(1), S.

430(1) and more in order to force Moore to violate the illegally-obtained, unlawful 2022 Probation Order.

⁸ For details on how simply it is to obtain one of these from the Royal Ottawa Mental Health Centre, see work-in-progress file at <https://pfi.rocks/organized-crime/vis/zeynep-selaman>.

15. No one has ever sustained any injuries (*de minimus*); with the exception of Moore who continues to endure ongoing testing of both her physical and mental capacity to endure Kiska's wicked, never-ending "divorce strategy".
16. Refusing to acknowledge Moore's testimony of the organized crime, gang-stalking and human trafficking that occurs in Ottawa—of which she has an abundance of evidence—would surely have caused a *reflex* action of attempting to get OPSB's attention as they refuse to respond to her 9-1-1 calls but instantly respond to Kiska's.
17. Moore's intent was not criminal; but, an attempt to raise awareness for the public good (*Mens Rea*): it is her hope that other media companies will attend her criminal trial.
18. It will become clear to the court that any evidence of *Actus Reus* that the Crown presents to the court is done without *any* concept of justice; just malice.

If the Crown secures a conviction on her remaining criminal allegation (or any others they may choose to add for Kiska's benefit), Moore will request the court to consider the *extreme* mitigating factors that will also be evidenced in the third-party records when considered in conjunction with her own material including:

- Circumstances at the time of the offense;
- Lack of a prior criminal record until Kiska's CAS/OPSB-leveraged shenanigans began in 2019;
- Minor role in the offense;
- Culpability of the victim;
- Past circumstances, such as perpetual, multi-faceted abuse that resulted in the alleged criminal activity.

APPENDIX B

Orders to be sought include, but are not limited to⁹, the unredacted records as they pertain to Deirdre Moore, Jonathan Kiska and/or their children, Sean Kiska and/or Cate Kiska under the control of:

1. The Children's Aid Society of Ottawa
2. Ontario's Office of the Children's Lawyer
3. Ottawa Police Services Board
4. Regional Municipality of Niagara Police Services Board
5. Royal Newfoundland Constabulary
6. St. John's Crown Attorney's Office
7. Ottawa's Crown Attorney's Office
8. Robert S.K. Welch Courthouse—Civil counter (St. Catharines, Ontario)
9. Ottawa Courthouse—all counters
10. Canada Revenue Agency, as they pertain to the years 2016-2024:
 - a. Kiska Management Consultants and
 - b. Jonathan Kiska
11. L'hôpital Suroit and/or Dr. Paule Kemgni
12. Diego-Fernandez Stoll, Lamah El-Rayes and Khaldoon Habib-Allah
13. Royal Ottawa Mental Health Centre
14. The Ottawa Hospital

⁹ Currently forced to abide by the rules in a shelter, I am not in a position to complete the list of documents sought. Additional records will be requested as they pertain to the witnesses listed at <https://pfi.rocks/mummygate/witness-list>.

15. Addelman Baum Gilbert Robinson LLP
16. Snir Law Office
17. Bell Baker LLP
18. Victor Vallance Blais LLP
19. (insert other law firms)
20. RCMP Ontario, Criminal Operations—O Division

(insert Tabs 1-9)

END OF SUBMISSION #1 FOR THESE APPLICATIONS