

ONTARIO  
SUPERIOR COURT OF JUSTICE  
OTTAWA

HER MAJESTY THE QUEEN

- and -

(R) MICHAEL WIWCZARUK (R)  
Representative

JEAN FRANCOIS DARILUS

JOSH CORTEZ

ABDIRAHMAN ALI FARAH

SAYED ABDUL WAHAB DADSHANI

(R) DEEPAN BUDAKOTI (R)  
Representative

MOHAMED H MOHAMED

MISHAAL ALSHAMMIRY

ALI ADDOUM-SALEH

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NOTICE OF APPLICATION AND CONSTITUTIONAL ISSUE  
Section 7 Application

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Section 7 Application

**TAKE NOTICE** that an application will be brought forward, at the earliest date available, in the month of June 2020, in the Superior Court of Ottawa for orders pursuant to section 24(1) of the Canadian Charter of Rights and Freedoms on the grounds that the Applicant(s) rights protected by section 7 of the Charter have been infringed.

## **THE GROUNDS OF THE APPLICATION ARE THAT:**

1. The Applicant has the right to life, liberty and security of the person and the right not to be deprived thereof except in accordance with the principles of fundamental justice.
2. The Applicant is charged under the Criminal Code and has been in detention during the COVID-19 pandemic.
3. The Applicant has been exposed to a plethora of deprived conditions and oppressive protocols. This is an egregious diminution of liberties being imposed in an already restrictive environment without supplementation. These impositions are tyrannical and dehumanizing, affecting the Applicant in a multitude of unconstitutional ways. Even during a pandemic the protection of human rights should be of fundamental importance in the administration of criminal justice, especially in pre-trial detention. The United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules) States :

## Basic principles, Rule 3

Imprisonment and other measures that result in cutting off persons from the outside world are afflictive by the very fact of taking from these persons the right of self-determination by depriving them of their liberty. Therefore the prison system shall not, except as incidental to justifiable separation or the maintenance of discipline, aggravate the suffering inherent in a situation.<sup>1</sup>

In Gosselin, McLachlin J, writing for the majority, agreed with Bastarache J that:

The dominant strand of jurisprudence on s. 7 sees its purpose as guarding against certain kinds of deprivation of life, liberty and security of the person, namely, those "that occur as a result of an individual's interaction with the justice system and its administration."<sup>2</sup>

As described by a report recently released by the World Health Organization (WHO) entitled: Preparedness, Prevention and Control of COVID-19 in Prisons and other Places of Detention: Interim Guidance

The Preamble states:

4) People in prisons and other places of detention are already deprived of their liberty and may react differently to further restrictive measures imposed upon them.<sup>3</sup>

<sup>1</sup> UNITED NATIONS A/RES/70/175, GENERAL ASSEMBLY, UN STANDARD MINIMUM RULES FOR THE TREATMENT OF PRISONERS (NELSON MANDELA RULES)

<sup>2</sup> GOSSELIN V QUEBEC (ATTORNEY GENERAL), [2002] 4 SCR 429 AT PARAS 77 [GOSSELIN]

<sup>3</sup> WORLD HEALTH ORGANIZATION, MARCH 15, 2020 (EUROPE), INTERIM GUIDANCE

4. The Applicant has been denied visits since March 10, 2020. Visits are the Applicant's only way to see a loved one and are imperative to maintaining relationships and support in the Community. Institutional policy entitles the Applicant to two visits a week. UN Standard Minimum Rules for the Treatment of Prisoners States:

Restrictions, discipline and sanctions, Rule 43

- 3) Disciplinary sanctions or restrictive measures shall not include the prohibition of family contact. The means of family contact may only be restricted for a limited time period and as strictly required for the maintenance of security and order.<sup>4</sup>

Contact with the outside world, Rule 58

- 1) Prisoners shall be allowed, under necessary supervision, to communicate with their family and friends at regular intervals:
- (b) By receiving visits.<sup>5</sup>

No part of pre-trial detention should be punitive or anymore restrictive of ordinary liberty than necessary. The deprivation of visits by the Ministry is an infringement that cannot be justified by COVID-19. No supplementation or alternative has left the applicant in a progressively deplorable situation. The Applicant cannot simply "Face Time" a loved one. The psychological impact of losing visits contributes to the Applicant's feelings of loneliness and isolation, while also further exasperating pre-existing mental health conditions. It has been interpreted that the right to security of the person can include serious state-imposed psychological stress. The denial of visits by the Ministry infringes the

<sup>4-5</sup> UNITED NATIONS A/RES/70/175, GENERAL ASSEMBLY, UN STANDARD MINIMUM RULES FOR THE TREATMENT OF PRISONERS (NELSON MANDELA RULES)

Security of the Applicant by causing psychological suffering. In New Brunswick v G(t) Supreme Court confirmed that:

The right to security of the person protects both the physical and psychological integrity of the individual.<sup>6</sup>

In Blencoe v British Columbia the Supreme Court declared:

The liberty interest protected by section 7 of the Charter is no longer restricted to mere freedom from physical restraint.<sup>7</sup>

5. At the Fifth UN Congress in 1975 Canada's delegation officially endorsed the UN Standard Minimum Rules for the Treatment of Prisoners. Canada's image portrays the embodiment of a Nation that protects everyone's human rights. It seems hypocritical that even before COVID-19 the Ministry falls alarmingly short of meeting the guidelines of our Nation's endorsement. In Canada (Justice) v Khadr the Court indicated that:

Canadian conduct that violates Canada's international human rights obligations will violate section 7 of the Charter.<sup>8</sup>

Since COVID-19 the Applicant has been exposed to increased restrictions of liberties and infringements of an egregious nature, encroaching on the Security of his person.

<sup>6</sup>) NEW BRUNSWICK (MINISTER OF HEALTH AND COMMUNITY SERVICES) v G(t), [1999] 3 SCR 46.

<sup>7</sup>) BLENCOE V BRITISH COLUMBIA (HUMAN RIGHTS COMMISSION), [2000] 2 SCR 307, 190 DLR

<sup>8</sup>) CANADA (JUSTICE) v KHAJR, [2006] SCR, [2010] 1 SCR 44

The Honourable Justice Schreck Stated in *R v Persads* that:

"Detention Centers are consistently failing to meet the Minimum Standards established by the United Nations in the 1950's."<sup>9</sup>

6. Further impetuous restrictions imposed by the Ministry as a response to COVID-19 came without supplementation but at the expense of the Applicant's already dilapidated liberties while in pre-trial detention. In Ontario, the Ministry of Community and Correctional Services' Adult Institutions' Policy and Procedures Manual (the manual) - Inmates - Conditions of Confinement reads in part:

### Policy

Correctional Services policy is to treat inmates in a responsible, just and humane manner that recognizes their inherent dignity as human beings; promotes their personal reformation, development and socialization; and affords them the rights, privileges and protections prescribed by law.<sup>10</sup>

### Procedures - Principles

When balancing the rights of inmates with the security and safety of the institutions, Correction Services adheres to the following principles:

- a) inmates retain all the rights, privileges and freedoms of a

<sup>9</sup> R.V. PERSADS, 2020, ONSC-188

<sup>10</sup> MINISTRY OF COMMUNITY SAFETY AND CORRECTIONAL SERVICES ADULT AND INSTITUTIONS POLICY AND PROCEDURES MANUAL (THE MANUAL) (JULY 2005) - INMATES CONDITIONS OF CONFINEMENT

member of Society, except those that are necessarily removed or restricted by incarceration.<sup>11</sup>

7. The following is a list of some of the restrictions imposed by the Ministry since COVID-19:

- a) Hygiene-person grooming-haircuts.
- b) Visits-total loss of visits.
- c) Religious programs-total loss of programs.
- d) Duty Counsel-legal help for self-representation.
- e) Treatment programs-John Howard Society, AA, NA, etc.
- f) Court-delays, restrictions.
- g) Dental and healthcare-loss of Dentist and specific healthcare.

It could be said that any of these restrictions violate The <sup>11</sup>Manual (Institutional Policy) in some way. They also encroach upon the Applicant's Rights under the Charter. Although the Applicant understands how volatile the situation has been, COVID-19 is not a justifiable excuse for the restrictions imposed during the Pandemic. Detention Centers are capable of supplementing the restrictions with alternatives.

Without first-hand experience in the deprivation of freedoms one is dealt in pre-trial detention, it's not possible to measure the value or fully understand the effects of losing what could be considered even the smallest of liberties.

In R v. St. Cloud:

St. Cloud allows for the consideration of the personal circumstances

of the defendant, including his physical or mental conditions.<sup>12</sup>

<sup>11</sup>MINISTRY OF COMMUNITY SAFETY AND CORRECTIONAL SERVICES ADULT INSTITUTIONS POLICY AND PROCEDURAL MANUAL (THE MANARLY) (JULY 2006)-INMATES-CONDITIONS OF CONFINEMENT

<sup>12</sup>R.V. ST.CLOUD (2015) 2 S.C.R. 328 (AT PARA 71)

8. The psychological stress caused by the increased risk to contract COVID-19 while in pre-trial detention cannot be overlooked.

Since the "outbreak" the Applicant has been in a constant state of fear and anxiety. There have been countless credible studies, professional opinions and Judicial Rulings reinforcing the increased vulnerability posed to anyone in prison. The media output has been a bombardment of information reminding the Applicant he is at increased risk. The exacerbation of the Applicant's pre-existing mental health conditions is the result of this disheartening environment. The Honourable Copeland J. in R v Jones recently ruled in a Superior Court decision that:

"The risks to health from this virus in a confined space with many people, like a jail, are significantly greater." <sup>13</sup>

In another recent ruling in Superior Court the Honourable A.J. Goodman J. in R v King also acknowledged the increased threat to inmates by stating:

"I would go further and find that the jeopardy and risk posed to inmates from COVID-19 while incarcerated in detention centers awaiting trials (that are currently suspended) is also a valid factor." <sup>14</sup>

The Honourable A.E. London-Weinstein J. also ruled that:

"In my view, the threat posed to the inability to self-isolate also raises concerns regarding the guarantee to security of the person, as guaranteed by Section 7 of the Charter." <sup>15</sup>

13) R.V. JONES, 2020, ONSC-1710

14) R.V. KING, 2020, ONSC-1935

15) R.V. CAIN, 2020, ONSC-2018

9. In many ways the detention center has fallen short in regards to protecting the Applicant against COVID-19. As a result, the Applicant and fellow inmates have taken precautions to ensure their own safety. The following is a list of some of the challenges the Applicant has been faced with in regards to protection against COVID-19 while in detention:

a) Personal Protection Equipment (PPE)

- inmates are not provided masks or protection

- Correctional Officers did not wear masks until April 25

- Requirement to wear masks poorly enforced

c) Social distancing/self isolation

- inability of living unit is 4 1/2 ft. wide

- Correction Officers walk every 30 min

- not possible to distance 6 ft

b) Inadequate Cleaning Supplies

- no sanitizer or proper soap

- improper sinks for hand washing

- no professional cleaning/improper supplies

d) Air Circulation

- studies show COVID-19 spreads in recirculated air,

- even more so in confined spaces

- most air volume is recycled

Quarantine units were not implemented until around April 25, well into the Pandemic. Before this, new admissions were being introduced to the General Population without proper screening. It's mere luck COVID-19 was not introduced. The Applicant and fellow inmates were forced to refuse new admissions to their living unit on several occasions for their own protection. This presumably contributed to what finally triggered the opening of Quarantine units. In addition, the inability to social distance puts the Applicant at constant risk of exposure to COVID-19 from the Correctional Officers. Someone infected with COVID-19 can be asymptomatic yet highly contagious. The risk of transmission in correctional settings is high. In the Affidavit of Danielle C. Ompad, PhD regarding SARS-CoV-2

## Infection (otherwise known as COVID-19) in Correctional Settings be stated:

- a) what would an outbreak look like in a correctional facility?
- b) Introduction of the SAR-CoV-2 virus to the correctional facility could be from visitors, correctional staff, attorneys and/or a newly incarcerated person. The person will likely be asymptomatic. As a result, the first facility-acquired COVID-19 case will not be detected until the that person shows symptoms. This means that the person could have transmitted the infection from 2 to 14 days without knowing it.<sup>16</sup>

10. It's a fact that the environment of pre-trial detention puts the Applicant at a higher risk to contract COVID-19 for many reasons. The environment has also become more restrictive during the Pandemic. This all contributes to elevated pressure and psychological stress the Applicant has struggled with throughout this situation. Even more concerning, are the Applicant's pre-existing mental health conditions being exacerbated on a daily basis because of all this. One of the measures recommended by the WHO and the OHCHR in the Interim Guidance COVID-19 FOCUS ON PERSONS DEPRIVED OF THEIR LIBERTY is:

### Health (p.7)

Special attention to mental health issues among persons deprived of their liberty. The need for routine mental health and psychosocial support shall be provided immediately.<sup>17</sup>

Nothing has been provided.

<sup>16</sup>) AFFIDAVIT OF DANIELLE C. OMPAD, PHD REGARDING SAR-CoV-2 Infection (otherwise known as COVID-19) in CORRECTIONAL SETTINGS

<sup>17</sup>) IASC, INTERIM GUIDANCE COVID-19: FOCUS ON PERSONS DEPRIVED OF THEIR LIBERTY, MARCH 2020, WHO, OHCHR

11. It's been extremely depressing for the Applicant not to meet the criteria for one of the many forms of release being granted to offenders who would otherwise be serving custodial sentences or awaiting trial. According to the Institutional Services Division and the Assistant Deputy Minister's Office RESPONSE TO COVID-19 reported:

<sup>16</sup> "The annual average population hasn't been as low as the current population since 1989/1990 fiscal year"<sup>18</sup>

A 26.9% reduction of inmates in custody across Ontario from March 16 2020 to April 07, 2020. The Ministry claims to have implemented several strategies to limit the effects of COVID-19 on their inmate population. There has been nothing done to mitigate or supplement the limitations imposed and/or the effects of the limitations imposed on those who remain in detention. The Report states further:

RESPONSE TO COVID-19 INFORMATION NOTE AUTHOR: INSTITUTIONAL SERVICES DIVISION, ASSISTANT DEPUTY MINISTER'S OFFICE

Actions: Personal visitation for inmates has been suspended until further notice. Institutions are working on local initiatives to provide extra postage, phone calls and other activities for inmates while visits are suspended. Institutions are also undertaking other local strategies to mitigate the impact of these limitations such as providing additional TV time or access to additional TV channels.

In support of inmates, the Ministry has also increased the weekly "canteen" limit by 50% to \$90 to allow inmates to purchase additional comfort and recreation items.<sup>19 (pg. 3)</sup>

Referring to the Ministry's RESPONSE TO COVID-19 INFORMATION NOTE

12. Phone calls are not "activities" but a fundamental right to inmates in any form of detention. During the Pandemic they have been the Applicant's only reliable form of communication to loved one's in the community. There have been no "activities" or "local strategies" which have mitigated any of the limitations imposed on the Applicant since the Pandemic. For the Ministry to make these claims and not fulfill them demonstrates their inability and unwillingness to provide care for the Applicant and their inmate population. Even if these provisions were generously granted, they are not what's required. The Applicant is dealing with increased psychological stress in an oppressive and disheartening environment. The entire inmate population has been restricted of their most intimate and important form of communication during a Pandemic. The Ministry, in response, has raised the Canteen Spending limit from \$60 to \$90, "In Support of inmates". Ontario had the lowest canteen spending limit of all detention centers in Canada. Raising the spending limit only equalized Ontario with every other province in Canada before COVID-19. It should be noted that many of the items available are shockingly overpriced and unhealthy, often nearing or surpassing best before dates. The Applicant, along with the majority of the inmate population have little to no money, no form of income and their only form of support is in the community, either waiting to go back to work or out of work completely.

13. Although the Applicant understands the challenge COVID-19 poses for the Ministry and it's institutions, it wasn't completely unpredictable. The threat of an Epidemic or a

Pandemic is knowledge as common as the threat of Natural Disasters. Preparation is critical in preventing and alleviating the effects they have on us. The Ministry's lack of preparation came at the expense of the Applicants Rights. Being in Pre-trial detention is being in the total and complete care of the Ministry. In such a restrictive environment it's incomprehensible that further limitations could be imposed without supplementation. The result has been an egregious deprivation of the Applicants liberties encroaching on multiple rights protected by the Charter:

Restriction

Possible  
Charter Violation

1) Religious Programs

Section: 2, 7, 12, 15

2) Programs (Reintegration/Treatment)

Section: 7, 12, 15

3) Visits

Section: 7, 11(d), 12, 15

4) Lockdowns

Section: 7, 12, 15

5) Duty Counsel

Section: 7, 10, 12, 15

6) Cleaning/(PPE)

Section: 7, 12, 15

7) Court (Delays, Restrictions)

Section: 7, 12, 15

8) Dental/Healthcare

Section: 7, 12, 15

4. The Ontario Human Rights Commission recently released a statement expressing the importance of ensuring that actions aimed at mitigating the risk of COVID-19 spread do not disproportionately burden vulnerable populations in an arbitrary and discriminatory manner. The OHRC further points out:

Individuals in these facilities also have the right to be free from discrimination including harassment related to COVID-19 in provision of services on grounds under the Code. Under the Charter, these individuals have a right to privacy, liberty and security of the person and the right to protection against discrimination, arbitrary detention, and cruel and inhuman treatment, subject to reasonable limits.<sup>20</sup>

In Supreme Court Chief Justice Wagner noted in *R v Myers* that:

The right to liberty and the presumption of innocence are fundamental tenets of the criminal justice system. In addition being detained prior to trial can have serious detrimental impacts on the accused ability to mount a defence and comes at a significant cost to liberty, mental and physical well-being, and family life.<sup>21</sup>

5. O.C.D.C. is a detention center already infamous for poor treatment of inmates and chronically substandard conditions. It doesn't even come close to meeting the UN Standard Minimum Rules for the Treatment of Prisoners. Correctional

<sup>20</sup>OHRC - POLICY - STATEMENT - COVID-19 - PANDEMIC  
<sup>21</sup>R v MYERS - 2019 - SCC - 18

Policy cannot be a limitless excuse or justification for infringements on the Applicants rights protected by the Charter. In a recent ruling Pratt v Nova Scotia (Attorney General) the Court of Appeal made it clear that:

The Ministry must give a reason for a decision to restrict liberties - as they must be protected. Correctional policies are not law.<sup>22</sup>

The Applicant is asking the Honourable Court to consider the egregious restrictions that have been imposed without supplementation during COVID-19 by the Ministry. The effects have been a deprivation of liberties in an already deprived environment. The significant psychological impact should also be considered. Especially where pre-existing mental health conditions exist. For similar substandard conditions while in the care of the Ministry, prior rulings have seen it just to grant enhanced credit and sentence reductions. Some exceeding 3 for 1.

R v Krauchow - 2002-O.J.-2172

R v Permesar - O.J.-5420

R v Fermah - 2019-ONSC-3597

R v Jana - 2018-ONSC-1252

R v Ward-Jackson - 2018-ONSC-178

R v Duncan - 2016-ONCA-754

<sup>22</sup>) PRATT V NOVA SCOTIA (ATTORNEY GENERAL)-2020-NSCA-59

IN SUPPORT OF THIS APPLICATION, THE APPLICANT  
RELIES UPON THE FOLLOWING:

1. Ministry legislated blue internal complaints and log records between February to present;
2. Ministry legislated internal requests;
3. In Ontario, (MSG) Adult Institutions Policy and Procedures Manual (The Manual); entire policy required including (but not limited to), haircuts, visits, programs...
4. Religious care Policy - March 26, 2019;
5. The Applicant(s) oral and written submissions as well as testimony;
6. UN - Standard Minimum Rules for the Treatment of Prisoners - The Fifth UN Congress - 1975 - Canada officially endorsed - Including the provisions in part 1 - Rules of General Application - (The Mandela Rules);
7. Subpoena List:

- 1) Dr. Woods - Psychiatrist - Royal Ottawa Mental Hospital
- 2) Professor Stephen Toope - UN Expert
- 3) Irene Mathiessen - Mothers Advocacy Group
- 4) Kelly Hannah-Moffat - Ontario Independent Expert (Human Rights and Corrections)
- 5) Kim Pate - Senator of Ontario
- 6) Alyna Beeson - Former Chief Psychologist - OCDC
- 7) Drew Taylor, M.A. (Criminology) Researcher - COVID-19 and Families of Criminalized Persons in Canada.

8. The following Affidavits:

- 1) Lisa Kerr - Professor at Queen's University of Law - Kingston, ON
- 2) Dr. Aaron Opkin - Physician Specialist in Public Health and Preventive Meds...
- 3) Dr. Danielle C. Ompad - PhD regarding SAR-CoV-2 infection in correctional setting;

9. Updated statistical research regarding COVID-19;
10. All case laws cited;
11. World Health Reports - (WHO) - (ONCHCR);
12. Such further and other materials that the Applicant(s) may provide and this Honourable Court may permit;

### THE RELIEF SOUGHT IS:

As in accordance with Section 24(1) of the Charter- Anyone whose rights or freedoms, as guaranteed by this Charter, have been infringed or denied may apply to a Court of competent jurisdiction to obtain such a remedy as the Court considers appropriate and just in the circumstances.

1. An order allowing this application;
2. A Declaration that the Applicant's rights under s.7 of the Charter have been infringed;
3. The granting of Corrective Orders;
4. Such further and other relief this Honourable Court deems Just.

I AFFIRM THIS SECTION 7 CHARTER APPLICATION  
AND DECLARE MYSELF AN APPLICANT. I DELEGATE  
DEEPAN BUDLAKOTTI AND MICHAEL WIWCZARUK  
AS REPRESENTATION SOLELY FOR THIS  
APPLICATION AND THE DURATION OF IT'S  
JUDICIAL PROCESS.

NAME D.O.B.  
Michael Wiwczaruk | 02/06/88

SIGNATURE DATE  
MW | June 01, 2020

Deepan Budlakoti | 16-17-89

Deepan Budlakoti | June 1, 2020

Mohamed H Mohamed | 08-12-89

MH | May 26, 2020

Ali Adam-Saleh | 04.18.92

AS | May, 26, 2020

Abdirahman Ali Farah | 03.11.98

AF | May 26, 2020

Josh Cortez | 06-25-89

JC | May 25-2020

Mishaal Alshammiry | 08-24-88

MAlshammiry | May 27-2020

Jean Francois Dorlus | 07-06-90

JFD | May 28-2020

Sayed Abdul Wahab Dashti | 07-13-77  
M-N-D-V

Sayed Abdul Wahab Dashti | June 01-2020



I AFFIRM THIS SECTION 7 CHARTER APPLICATION  
AND DECLARE MYSELF AN APPLICANT. I DELEGATE  
DEEPAN BUDLAKOTTI AND MICHAEL WIWCZARUK  
AS REPRESENTATION SOLELY FOR THIS  
APPLICATION AND THE DURATION OF IT'S  
JUDICIAL PROCESS.

NAME D.O.B.  
Michael Wiwczaruk | 02/06/88

SIGNATURE MW DATE June, 01, 2020

Deepan Budlakoti | 11-17-89

Deepan Budlakoti | June, 1, 2020

Mohamed H Mohamed | 08-12-89

MH | May, 26, 2020

Ali Adam-Saleh | 04.18.92

AS | May, 26, 2020

Abdirahman Ali Farah | 03.11.98

AF | May 26, 2020

Josh Cortez | 06-25-89

JC | May 25 - 2020

Mishaal Alshammiry | 08-24-88

MAlshammiry | May 27 - 2020

Jean Francois Dorilus | 07-06-90

JFD | May 28 - 2020

Sayed Abdul Wahab Dadshan | 07-13-77

SAW | May 28 - 2020

Form 3  
BACKSHEET

Court File No.

THE APPLICANT MAY BE SERVED  
WITH DOCUMENTS PERTINENT TO  
THIS APPLICATION

SUPERIOR COURT OF JUSTICE  
Ottawa  
HER MAJESTY THE QUEEN  
- and -

(name of accused/applicant/appellant/respondent)

1. By Service in accordance with rule 5,  
through

(3) Deepan Budayokoti 10-17-89  
(R) Michael Wimczak 02-16-88

Mohamed H Mohamed 08-12-89

Ali Adam-Saleh 04-18-92

Abdirahaman Ali Farah 03-11-98

Josh Carter 06-25-89

Mishaal Alshammri 08-24-88

Jean Francois Daruis 07-06-90

Sayed Adel Wahab Dabbani 07-13-97  
M-D-Y

Notice of Application, Form 1

(Criminal Proceedings Rules, Form 3)

(name of counsel)

Ottawa Correctional Detention Center  
2244 Innes Rd, Ottawa, Ont  
K1B 4C4

(complete address of counsel)

(counsel's telephone and fax numbers with area code)

[redacted]

[redacted]

[redacted]

Dated at (O.C.D.C.) Ottawa, Ontario, this 01 day of June, 2020