

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

MAHER ARAR

Plaintiff

and

**THE SYRIAN ARAB REPUBLIC and
THE HASHEMITE KINGDOM OF JORDAN**

Defendants

STATEMENT OF CLAIM

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim 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 defence 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 defence 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 defence, 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 defence.

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 PLAINTIFF'S CLAIM, and \$1000.00 costs, within the time for serving and filing your statement of defence, 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 plaintiff's claim and \$400.00 for costs and have the costs assessed by the court.

Date _____

Issued by _____

Local registrar

Address of

Court office 393 University Avenue,
10th Floor
Toronto, Ontario
M5G 1E6

TO: Syrian Arab Republic

AND TO: Hashemite Kingdom of Jordan

CLAIM

1. The Plaintiff Maher Arar claims:
 - a. damages as against the Syrian Arab Republic for kidnapping, false imprisonment, assault, torture and death threats in the amount of \$5,000,000.00;
 - b. damages as against the Hashemite Kingdom of Jordan for kidnapping, illegal confinement, assault and torture in the amount of \$1,000,000.00;
 - c. punitive damages as against the Syrian Arab Republic and the Hashemite Kingdom of Jordan in further amount of \$25,000,000.00;
 - d. pre-judgment and post-judgment interest on all monies due and owing pursuant the *Courts of Justice Act*, R.S.O. 1990, c. C.43;
 - e. the costs of this action on a substantial indemnity basis, plus GST; and
 - f. such further and other relief as this Honourable Court deems just.

Overview

2. Mr. Arar was kidnapped, falsely imprisoned, assaulted, threatened and tortured at the hands of the Jordanian and then the Syrian authorities while in their custody. He claims for damages in tort and due to violations of the strongest principles of international law, *jus cogens* norms.

The Parties

Maher Arar

3. Mr. Arar is a 33-year-old Canadian citizen. He and his parents came to Canada from Syria when he was seventeen years old. Mr. Arar attended university in Montreal and eventually obtained a Masters degree in telecommunications.

4. Mr. Arar met his wife, Monia Mazigh, at McGill University. The couple married in 1994. They have two young children.
5. In December 1997, Mr. Arar and his family moved to Ottawa from Montreal. Mr. Arar took a job with The MathWorks, a high-tech firm based in Boston in 1999. Mr. Arar's job involved a significant amount of travel within the United States.
6. In 2001, Mr. Arar started his own consulting company in Ottawa. He continued to work for The MathWorks as a contractor until his detention in New York September, 2002.

The defendants

7. The defendants, the Syrian Arab Republic and the Hashemite Kingdom of Jordan are member states of the United Nations.

Background to Mr. Arar being delivered to the Jordanian Authorities

8. Until the matters at issue in this case, Mr. Arar had no prior problems with the authorities. Mr. Arar is a father and a husband. He is a telecommunications engineer and entrepreneur. He is a law-abiding Canadian citizen.
9. Mr. Arar is not a member of Al Qaeda. He does not know anyone who belongs to Al Qaeda. Mr. Arar's knowledge of Al Qaeda is limited to what he has seen in the media. Mr. Arar has never been to Afghanistan and has no plans to ever go to Afghanistan.

10. In September 2002, Mr. Arar, his wife, their children, and his wife's family were vacationing in Tunis when Mr. Arar received an e-mail from his employer informing him that he was needed to perform consulting services. Mr. Arar decided to return to Ottawa alone to prepare for work.
11. Mr. Arar secured a flight from Tunis to Montreal with stopovers in Zurich and New York. He arrived in New York at 2:00 p.m. on September 26, 2002. Mr. Arar was pulled aside at immigration and taken to another area. After two hours, officials came and took Mr. Arar's picture and fingerprints. They informed Mr. Arar that this was standard procedure.
12. Police officers searched Mr. Arar's bags and photocopied his passport. They did not respond to Mr. Arar's questions about what was going on and they would not allow Mr. Arar to make a phone call.
13. A group of officials then came to question Mr. Arar. One individual identified himself as an FBI agent, while another stated that he was from the New York Police Department. When Mr. Arar said that he wanted a lawyer, he was told that he had no right to a lawyer because he was not an American citizen.
14. The officials questioned Mr. Arar about where he worked and how much money he made. They were verbally abusive, swearing at Mr. Arar and insulting him. During the questioning, the officials consulted a report which contained information of such a private nature that Mr. Arar believed it could only have come from sources in Canada.

15. Mr. Arar was forthright in answering all their questions. He was asked about his travel in the United States. Mr. Arar told them everything he knew. He told them about his work permits and his business in the United States.
16. The officials asked Mr. Arar about his computer and the information it contained. When they asked whether he would be willing to share such information, Mr. Arar agreed that he would.
17. Mr. Arar was questioned about various individuals, the majority of whom he had never met.
18. Mr. Arar was questioned about Abdullah Almalki. Mr. Arar told the officials that he had worked with Abdullah Almalki's brother at high tech firms in Ottawa, and that the Almalki family had come from Syria about the same time as Mr. Arar. Mr. Arar told his interrogators that he did not know Abdullah well, but had seen him a few times. Mr. Arar described Mr. Almalki to the best of his recollection. He stated that his connection to Abdullah Almalki was a casual one. The interrogators yelled at Mr. Arar, accusing him of having a selective memory.
19. The interrogators then showed Mr. Arar a copy of his 1997 rental lease agreement and pointed out that Abdullah Almalki signed the lease as a witness. Mr. Arar was shocked that American officials had a private document of his in their possession. At the same time, Mr. Arar realized that he had completely forgotten that Abdullah Almalki had signed the lease as a witness. Mr. Arar had asked Abdullah's brother to witness the lease, however as he was unable to attend he sent Abdullah in his place. The interrogators did not believe that Mr. Arar had

honestly forgotten about this incident. The interrogation continued until midnight. Throughout the interrogation, Mr. Arar's repeated requests for a lawyer were ignored. Finally, Mr. Arar was shackled at the wrists and ankles and transported to a detention centre near the airport. No one would tell Mr. Arar what was going on.

20. The questioning resumed the following morning. The interrogators asked Mr. Arar what he thought about Osama Bin Laden, Palestine, and Iraq. They asked Mr. Arar about the mosques he prayed in, his bank accounts, his e-mail addresses, and his relatives who live the US. The questioning continued off and on for eight hours.
21. An individual from Immigration and Naturalizations Services ("INS") arrived and informed Mr. Arar that they wanted him to volunteer to return to Syria. Mr. Arar refused. Mr. Arar stated that he wanted to go home to Canada or, in the alternative, be sent back to Switzerland. The INS official told Mr. Arar that he was a "special interest".
22. Mr. Arar was then told to sign a form, but the officials would not allow Mr. Arar to read it beforehand. Mr. Arar was so exhausted, confused, and disoriented at this point that he complied. He had neither slept nor eaten since leaving the plane. Later that evening, he was given a cold McDonalds meal. The shackles were put back on and Mr. Arar was taken to what he later learned was the Metropolitan Detention Centre.

23. Mr. Arar was strip searched. He was given an orange jumpsuit to wear. He was forced to sign forms and then given a vaccination. They would not tell him what kind of vaccination they were administering. Mr. Arar's arm was red for nearly two weeks following the vaccination.
24. Mr. Arar was then taken to a cell. Again, he asked for a phone call and for a lawyer. Again, the officials ignored these requests. They also refused to provide him with a toothbrush or toothpaste, and denied him reading material. He received a copy of the Koran two days later.
25. Mr. Arar was allowed to make one phone call after five days of being detained. He called his mother-in-law, who was in Ottawa at the time, and told her that he feared he might be sent back to Syria and that he needed to find a lawyer. Mr. Arar was only allowed to use the phone for two minutes.
26. On the seventh or eighth day of detention, officials told Mr. Arar that he was going to be deported. They brought a document for Mr. Arar to fill out. They informed Mr. Arar that he had a choice of places to which he could be deported. Mr. Arar indicated, in writing, that he wanted to return to Canada and that he had no concerns about going to Canada and signed the document.
27. On October 4, 2002, the representative of the Canadian government, Maureen Girvan, came to see Mr. Arar in detention. Mr. Arar told her that he feared he would be deported to Syria. She assured Mr. Arar that would not happen and said that arrangements were being made for a lawyer.

28. On October 5, 2002, a lawyer, Amal Ouumih came to see Mr. Arar. She told Mr. Arar not to sign any document in her absence. She told Mr. Arar she would try to help him.
29. On October 6, 2002, at approximately 9:00 p.m., Mr. Arar was informed that his lawyer had come to see him. He was taken to a room where seven or eight people waited. Mr. Arar was told that his lawyer had refused to come. They asked Mr. Arar why he did not wish to return to Syria. Mr. Arar stated that he would be tortured if he went back. Mr. Arar explained that there were several reasons for him to fear Syrian authorities: he had not completed his military service; he was a Sunni Muslim; his mother's cousin had been accused of being a member of the opposition group the Muslim Brotherhood and imprisoned for nine years. The interrogators asked Mr. Arar to sign a document and Mr. Arar refused. He reiterated that he would be tortured if sent back to Syria.
30. On October 8, 2002, Mr. Arar was informed that he was leaving. Once again, he was strip searched and shackled. Mr. Arar was then taken to another room where two officials read to him a decision which they said was made by the INS Director. The officials told Mr. Arar that based on classified information he was being deported to Syria. Mr. Arar told them he would be tortured there. The officials responded by reading to Mr. Arar a statement to the effect that the INS is not governed by the Convention Against Torture and Cruel, Inhuman or Degrading Treatment or Punishment.

31. Mr. Arar was driven to an airport in New Jersey. He was put on a small private jet and flown to Washington. Mr. Arar overheard the officials on the plane talking about how Syria had refused to take Mr. Arar directly, but that Jordan would take him.
32. Mr. Arar was flown to Jordan. He spent the flight thinking about how to avoid being tortured. He arrived in Jordan on October 9, 2002.

Torture in Jordan

33. Upon arrival, six or seven Jordanian men were waiting for Mr. Arar. These men were officials of the Jordanian government who received Mr. Arar and took him into custody upon his arrival in Jordan. They blindfolded and shackled Mr. Arar and put him in a van. They made Mr. Arar bend his head down in the back seat. Then the men began beating Mr. Arar. Whenever Mr. Arar attempted to speak the men would beat him. They arrived at a building where Mr. Arar's blindfold was taken off and he was questioned briefly before being taken to a cell. Later that day, Mr. Arar was fingerprinted, blindfolded, and put in a van. He was told that he was being sent back to Montreal.
34. About forty-five minutes later, Mr. Arar was put into a different car. He was beaten again and forced to keep his head down. They drove for about an hour until they arrived at what Mr. Arar believes was the Jordanian-Syrian border.
35. Mr. Arar was kidnapped illegally by the Jordanian officials who denied him his freedom, forcibly detaining him against his will. Mr. Arar was not charged with

any offence under Jordanian law, but was held and tortured by officials of the Jordanian government. These same Jordanian officials transported him against his will to Syria and handed him over to the custody of the Syrian officials.

36. At no time was Mr. Arar brought before a Court of Law. At no time was Mr. Arar formally charged with any offence. At no time was Mr. Arar given any access to any lawyer.

Torture in Syria

37. Once in Syria, Mr. Arar was put in another car and driven for another three hours.
38. Mr. Arar was taken into a building where guards went through his bags. Mr. Arar was told that he was in the Palestine Branch of the Syrian military intelligence. Mr. Arar was not formally charged with any offence. He was held against his will and was denied access to any legal counsel.
39. Three men took Mr. Arar into a room. They sat Mr. Arar down and one of the men began questioning him. Mr. Arar learned later that this man was a colonel in the Syrian military. Mr. Arar was asked about his brothers and why his family had left Syria. Mr. Arar answered all the colonel's questions. When Mr. Arar did not answer quickly enough, the colonel would point to a metal chair in the room and ask, "Do you want me to use this?" Mr. Arar learned later that the chair was used to torture people.
40. Mr. Arar was terrified of being tortured. Mr. Arar asked the colonel what he wanted to hear. Mr. Arar was not tortured on the first day, but he was threatened

- with torture. The questioning on the first day lasted for four hours. Mr. Arar was then taken to a cell.
41. Mr. Arar was locked in a tiny cell with very little light. He was given two blankets, two dishes, one bottle for water and one bottle for urinating into. There was a small opening in the ceiling of his cell through which rodents roamed and cats urinated. Mr. Arar was kept in this cell for ten months and ten days.
 42. The torture began on the second day of detention.
 43. One of the tactics used by the torturers was to question Mr. Arar for two hours, then put him in a waiting room so that he could hear the screams of other prisoners being tortured before the interrogation was resumed.
 44. The torturers used a two-inch thick electric cable to beat Mr. Arar. They used the cable to hit Mr. Arar all over his body, aiming mostly at his palms. They also struck Mr. Arar on his hips and lower back. In addition, the torturers constantly threatened to use the metal chair, tire and electric shocks.
 45. The torturers used the tire to restrain prisoners while beating the soles of their feet. Mr. Arar was put in the tire as a threat, but was not beaten while in the tire.
 46. The torturers beat Mr. Arar with the cable on the second and third day of his detention. After that, the torturers beat Mr. Arar with their fists. They struck Mr. Arar's stomach, the back of his neck, and his face.

47. At the end of the second day, the torturers told Mr. Arar that the next day would be worse.
48. On the third day, Mr. Arar was interrogated for approximately eighteen hours.
49. The torturers alternated between beating Mr. Arar and making him wait in the waiting room where he could hear the screams of other prisoners being tortured.
50. The torturers wanted Mr. Arar to say that he had been in Afghanistan. They continued beating Mr. Arar until he falsely confessed to having gone to Afghanistan. At this point, Mr. Arar would have confessed to anything in order to end the torture.
51. The torturers also wanted Mr. Arar to say that he went to a training camp.
52. The intensity of the beatings became less severe on the following days, however, at the end of each day Mr. Arar was told, "Tomorrow will be harder for you." Mr. Arar could not sleep with the constant threat of torture hanging over him. For the first four days, Mr. Arar did not sleep at all and for the first two months, he was only able to sleep for two hours a day. Often, Mr. Arar was not taken back to his cell, but to the waiting room where he had to listen to the torture of other prisoners.
53. The beatings subsided around October 17, 2002. Instead, the torturers began what Mr. Arar described as "mind games". The torturers began to take the blindfolded plaintiff into a room where he could hear people talking about him. Mr. Arar could hear them saying things like, "He knows lots of people who are terrorists";

- “We will get their numbers”; “He is a liar”; and “He has been out of the country for long”. Then they would say, “Let’s be frank, let’s be friends, tell us the truth”, after which they approached Mr. Arar and slapped his face.
54. The interrogation and beatings ended on October 20, 2002, three days before the Canadian consul’s first visit. Mr. Arar was removed from his cell and taken to another building. Mr. Arar saw the colonel and some other men in the hallway and noticed that they seemed very nervous and agitated.
55. Mr. Arar was told not to say anything about the beatings he had suffered. He was then taken into a room for a ten-minute meeting with the Canadian consul, Leo Martel. The colonel and three other Syrian officials were also in the room, along with an interpreter. Mr. Arar wept during the meeting, but could not say anything about the torture to which he was being subjected. Mr. Arar feared that if he did, he would not only be beaten but also that he would not be allowed future consular visits. There were seven consular visits in total, but each proved futile and frustrating as Mr. Arar was not able to tell the consul what was really taking place.
56. After one month of his arrival in Syria, Mr. Arar was instructed to sign and place his thumbprint on a handwritten document that was about seven pages in length. He was not allowed to read the document, but was forced to place his thumbprint and signature at the bottom of each page.
57. Mr. Arar was presented with another document that was about three pages long. This document contained questions such as “Who are your friends?” and “How

- long have you been out of the country?” With the exception of the last question, all of the questions on the form had already been filled out. In answer to the last question, Mr. Arar was forced to write that he had been to Afghanistan.
58. By December 2002, Mr. Arar was in very bad shape, both physically and emotionally. He suffered panic attacks which left him screaming, he had difficulty breathing, and he was often dizzy. He lost roughly 40 pounds while in detention.
 59. Mr. Arar was not exposed to sunlight for six months. The only times he was allowed to leave his cramped cell was to be interrogated and beaten, and when he had visits from the Canadian consul.
 60. On August 19, 2003, Mr. Arar was taken to see another official. The official told Mr. Arar to write what the official dictated. When Mr. Arar protested, the official kicked him and threatened him with the tire. Mr. Arar was forced to write that he had been to a training camp in Afghanistan. He was forced to put his thumbprint and signature on the last page of the false confession.
 61. Later that day, Mr. Arar was transferred to a place which he later learned was the Investigation Branch. The following day Mr. Arar was then taken to the Sednaya prison. After his ordeal at the Palestine Branch, the time spent at Sednaya was, according to Mr. Arar, “like heaven for me. I could move around, and talk with other prisoners. I could buy food to eat and I gained a lot of weight there. I was only beaten once there.”

62. Around the 19th or 20th of September 2003, Mr. Arar heard that another Canadian had arrived. Mr. Arar recognized this man as Abdullah Almalki. Mr. Arar learned that Abdullah Almalki had also been held at the Palestine Branch and that he too had been tortured, even more severely than Mr. Arar.
63. On September 28, 2003, Mr. Arar was blindfolded, and taken back to the Palestine Branch. He was placed in one of the waiting rooms where he could hear the screams of prisoners being tortured. Later that day, he was called into an office and asked questions, namely about what he would say if he were returned to Canada. Mr. Arar was then returned to the waiting room and kept there for one week, listening to the torture of the prisoners.
64. On October 5, 2003, Mr. Arar was driven to a court and placed in a room with a prosecutor. Mr. Arar requested a lawyer, but was told that he did not need one. The prosecutor read from Mr. Arar's false confession. Mr. Arar attempted to explain that the confession had been beaten out of him and that he had never been to Afghanistan, but the prosecutor did not appear to be listening. The prosecutor told Mr. Arar to put his fingerprint and his signature on a document which he would not allow Mr. Arar to read. Then the prosecutor told Mr. Arar he would be released.
65. Mr. Arar was taken back to the Palestine Branch where he was met by the head of the Syrian military intelligence and officials from the Canadian embassy including Leo Martel. Mr. Arar was then released and allowed to return to Canada.

Damages Suffered by Mr. Arar

66. As a result of his treatment by the defendants, Mr. Arar suffered:
- a. Severe emotional and psychological distress.
 - b. Serious physical injuries.
 - c. Loss of his employment and ability to earn his livelihood.
 - d. Separation for his family and wife and children who also suffered severe emotional and psychological distress.
67. As a result of his treatment by the defendants, Mr. Arar continues to suffer:
- a. Severe emotional and psychological distress.
 - b. Physical pain and suffering as a result of the torture that he received at the hands of the Syrian authorities.
 - c. Severe damage to his reputation which has affected his ability to earn his livelihood

The Defendants' Liability for Mr. Arar's Damages

68. The defendants are liable under their respective domestic laws, the law of Canada and international law for the damages suffered by Mr. Arar.

69. The kidnapping, false imprisonment, assault, torture and death threats committed by defendants against Mr. Arar are all violations of the laws of the Syrian Arab Republic, the Hashemite Kingdom of Jordan and Canada.
70. The kidnapping, false imprisonment, assault, torture and death threats committed by and in the name of the defendants against Mr. Arar are also violations of international law because they were committed by or on behalf of states.
71. Mr. Arar pleads and relies upon the International Covenant on Civil and Political Rights, including in particular the guarantee in Article 7 that “No one shall be subjected to cruel, inhuman or degrading treatment or punishment.” Both defendants have ratified the Covenant and it is binding upon them under international and their respective domestic laws.
72. Mr. Arar further pleads and relies upon the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. Article I of the Convention Against Torture states that:
- ... the term "torture" means any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act that he or a third person has committed or is suspected of having committed, or intimidating or coercing him or a third person, or for any reason based on discrimination of any kind, whether such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity.
73. The Hashemite Kingdom of Jordan is a State Party to the Convention.

74. Mr. Arar also pleads and relies upon customary international law, which prohibits torture. The prohibition against torture is a norm of *jus cogens* that is binding upon all states.

No Entitlement to Sovereign Immunity

75. The International Covenant on Civil and Political Rights, the Convention against Torture and customary international law establish and confirm that principles of international law that prohibit kidnapping, false imprisonment, assault, torture and death threats committed by or on behalf of states are so fundamental that those principles are *jus cogens* and override all other laws with respect to foreign sovereign immunity. As the prohibition against torture is *jus cogens* and as torture violates the law of nations, no state can be immune from prosecution for violating *jus cogens*, regardless of whether a state is a State Party to either convention.
76. Mr. Arar therefore pleads that the Ontario Superior Court of Justice has jurisdiction to hear this action notwithstanding the provisions of the *State Immunity Act* R.S.C. 1985, c. S-18.
77. Mr. Arar further pleads that he is entitled to the full protection of the laws of Canada and specifically the following sections of the *Canadian Charter of Rights and Freedoms*:
7. Everyone 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.

12. Everyone has the right not to be subjected to any cruel and unusual treatment or punishment
9. Everyone has the right not to be arbitrarily detained or imprisoned.
- 15(1) Every individual is equal before and under the law and has a right to equal protection and equal benefit of the law without discrimination ...
- 52(1). The Constitution of Canada is the supreme law of Canada, and any law that is inconsistent with the provisions of the Constitution is, to the extent of the inconsistency, of no force or effect.
78. Mr. Arar pleads that section 3 of the *State Immunity Act*, insofar as it may provide immunity to the defendants for kidnapping, false imprisonment, assault, torture and death threats against Mr. Arar is *ultra vires* the *Canadian Charter of Rights and Freedoms* and therefore of no force and effect.

Claim for Punitive Damages

79. Mr. Arar further pleads that the conduct of the defendants as pleaded herein was so outrageous, egregious, illegal and contrary to the laws of nations that he is entitled to punitive damages against the Syrian Arab Republic and the Hashemite Kingdom of Jordan in the further amount of \$25,000,000.00 together with interest thereon.

Jurisdiction of the Court

80. Mr. Arar relies on the facts and allegations set out above and upon subsection 17.02(h) of the Rules of Civil Procedure for the purposes of service of this statement of claim upon the defendants outside of Ontario.

81. Mr. Arar is a citizen of Canada and a resident of Ontario. He continues to suffer personal injury in Canada as a result of the kidnapping, false imprisonment, assault, torture and death threats that he sustained in Jordan and Syria, as pleaded herein, in the form of physical pain and psychological damages, including but not limited to post traumatic stress. Mr. Arar relies on section 6 of the *State Immunity Act* and pleads that the defendant is not immune from the jurisdiction of this court for that personal injury and those damages that have continued to occur in Canada.

82. The plaintiff proposes that this action be tried at Toronto, Ontario, before a jury.

November 21, 2003

LORNE WALDMAN
Barrister and Solicitor
Waldman and Associates
281 Eglinton Avenue East
Toronto, Ontario
M4P 1L3

Tel: (416) 482-6501

Fax: (416) 489-9618

Solicitor for the Plaintiff