

FEDERAL COURT

BETWEEN:

Michael Taylor

Plaintiff

and

His Majesty the King (in the right of the province of Alberta), (Attorney General of Canada) Arif Virani, (former Minister of Public Safety) Dominic Leblanc, (Alberta Minister of Justice) Mickey Amery, (Alberta Deputy Premier & Minister of PSES) Mike Ellis, (Minister of Service Alberta and Red Tape Reduction) Dale Nally, Alberta (Workers Compensation Board), Royal Bank of Canada, Business Development Bank of Canada, The City of Calgary, Enmax Power Corporation, Calgary Police Service, Municipal District of Foothills No. 31, Gail Greenough, Parkland Geo Ltd., Michale Staple, Digicom Technology Services Inc., Cole Terras, Groundworks (Doug Lacey Basement Authority), Ryan Seamans, Cochrane Landscape Supply Ltd., James Connolly, Jen McMullin, Kevin Les, Tanya McKee, Joshua Staff, Christopher Bond, IB Jensen Masonry Ltd., Christopher Bartsch, Ryan Landine, Kristi Zychowa, Kathleen Mullally, Elain McGee, Marion Skaja, Darlene Addun, Steve Kletke, Sean Strachan, ABC Corporation, ABC Corporation, John Doe and John Doe

Defendant(s)

**REPLY TO STATEMENT OF DEFENCE OF SEAN STRACHAN**

## 1. In specific response to paragraph 2 of the statement of defence

- (i) The plaintiff is seeking relief as afforded by the *Crown Liability and Proceedings Act R.S.C., 1985, c. C-50 s.3 (b)(i)(ii) with respect to loss and damages caused by the actions of Sean Strachan and Dale Adams Automotive Ltd.*
- (ii) *Sean Strachan / Dale Adams Automotive ltd.* acted within the meaning of S. 21 of the Criminal Code to aid and abet the furthering of an unlawful object – the conspiracy to defraud, defame, dehouse, and dehumanize Mr. Taylor. Sean Strachan acted criminally in the tortious conversion of Mr. Taylors property.
- (iii) Sean Strachan specifically communicated with the plaintiff in respect to Mr. Taylors vehicle, consciously making fraudulent misrepresentations about the vehicles condition and repair. Mr. Strachan / DAA purposefully falsified a work order to purport a desired narrative about the vehicles condition. Mr. Taylor expressly claims this was aiding in the obstruction of justice by falsifying evidence to be used in a judicial proceeding.
- (iv) Sean Strachan / DAA acted in contravention of S. 430 of the Criminal Code and have pertinent knowledge of the actors that are appropriately defined under S.22 of the criminal code.
- (v) As detailed in the statement of claim, the plaintiff is seeking damages against agents of the crown for malicious prosecution and several charter infringements. It is the plaintiff's understanding that the federal court is the appropriate venue for pursuing damages for civil torts committed by agents of the crown. As cited in *R.S.C., 1985, c. C-50 s. 21*, the federal court is deemed to have concurrent jurisdiction with the superior provincial court.
- (vi) As cited in *the Court of Justice Act, RSA 2000, c C-30.5 s. 9.6 2(c)(d)* the provincial court is stated not have jurisdiction to adjudicate matters relating to malicious prosecution or claims against a judge, justice of the peace or peace officer for anything done while executing the duties of their office.
- (vii) Mr. Taylor vehemently believes that his experience calls into question a matter of public importance. The Issue? *Should investigators be allowed to exploit or otherwise influence a "privileged" relationship in their pursuit of "justice"?* Mr. Taylor has so far been unable to access or review any legislation that outlines any limitations or parameters governing such questionable (deplorable) conduct. Mr. Taylor truly believes that the federal court is the most appropriate venue to pursue remedy for this issue.

**2. In specific response to Paragraph 3 of the statement of defence:**

- (i) Mr. Taylor acknowledges the existence of KB file # 2401 -11397. Mr. Taylor filed this statement of claim against DAA on August 15, 2024. In this action, “John Doe / ABC corporation” are also named as defendants. Mr. Taylor has been acutely aware that the actions of Sean Strachan and Dale Adams Automotive were directly influenced and made at the behest of malicious prosecutors and their agents.
- (ii) As aforementioned, given the status of the parties involved, Mr. Taylor believes that the federal court is the appropriate venue to pursue this action. Mr. Taylor would ultimately withdraw KB #2401-11397 if it is determined that that federal court IS the appropriate jurisdiction. Alternatively, if it is determined that the provincial court is the appropriate venue, then Mr. Taylor would pursue filing a motion for joinder to amend the parties and seek appropriate remedy through the Court of Kings Bench.
- (iii) The plaintiff denounces any suggestion that these proceedings are in any way vexatious or an abuse of process. Mr. Taylor has suffered irreparable damage to his livelihood, property, and dignity. Mr. Taylor has been unlawfully stripped of his affordable housing during this persecution and is now technically homeless. These damages are a result of unconscionable collusion, malfeasance and abuse of power. As described in the statement of claim, the CPS and RCMP have acted to serve only the interests of prosecutors & investigators while treating Mr. Taylor with contempt, displaying reckless disregard for his right to equal protection of the law. Mr. Taylor has clearly been categorized as “subhuman” in the eyes of these actors, and civil action is the only avenue to remedy the abhorrent injustice and egregious misconduct of parties involved.
- (iv) Naming Sean Strachan as a defendant in this action is warranted and best described in *R.R.O. 1990, Reg. 194, r. 5.03 (1) Every person whose presence is necessary to enable the court to adjudicate effectively and completely on the issues in a proceeding shall be joined as a party to the proceeding.*

**3. In specific response to paragraph 4 & 5 of the statement of defence:**

- (i) The plaintiff expressly states that Sean Strachan acted in contravention of the criminal code and is appropriately defined under s. 21 of the code. Mr. Taylor's allegations are matters of absolute fact, supported by material evidence, that will be proven beyond a reasonable doubt at trial.
  
- (ii) Sean Strachan and Dale Adams Automotive have acute knowledge of the parties responsible for the tortious conversion and intentional infliction of economic loss perpetrated against the plaintiff. These facts will undoubtedly come to light through the discovery process.
  
- (iii) Sean Strachan and DAA have acted in contravention of Criminal Code, RSC 1985, c C-46 sections. **21, 137, 361, 380, 429, 430**
  
- (iv) Sean Strachan and DAA acted in deliberate contravention of Automotive Business Regulation, Alta Reg 192/1999 **sections 31.6, 31.7 & 12** (AR 192/99 s12;1/2006)

4. Mr. Taylor defers to the remedy sought in the Statement of claim, and relies upon the Tort-Feasors Act, RSA 2000, c T-5 for the court to determine the defendant's responsibility for damages or provide any other remedies it deems necessary.

February 26, 2025

[REDACTED]

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