

CANADA / JUDGMENT

Prud'Homme v. Canada

2025 FC 1938

COURT

Federal Court

DECIDED

8 December 2025

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Prud'Homme v. Canada

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Date

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2025 FC 1938

File numbers

T-1750-25

Decision Content

Date: 20251208

Docket: T-1750-25

Citation: 2025 FC 1938

Toronto, Ontario, December 8, 2025

PRESENT: The Honourable Madam Justice Furlanetto

BETWEEN:

CODY ANDREW PRUD'HOMME

Plaintiff

and

HIS MAJESTY THE KING

Defendant

ORDER AND REASONS

I. Overview [1] This is the second time the Respondent has moved to strike the statement of claim in this action. In response to the first motion, Associate Judge Moore struck the statement of claim as originally filed but provided leave to amend. The Respondent argues that the Amended Statement of Claim [Amended Claim] should also be struck, without further leave to amend, pursuant to Rules 221(1)(a), (c) and (f) of the Federal Courts Rules, SOR/98-106 [Federal Courts Rules], as it continues to disclose no reasonable cause of action, is frivolous or vexatious, and is an abuse of process.

[2] For the reasons set out below, the motion is allowed, and the Amended Claim will be struck, without further leave to amend.

II. Law Relating to Motions to Strike [3] The law relating to motions to strike is well settled. A claim will be struck only in the clearest of cases. On a motion to strike a claim as disclosing no reasonable cause of action, the moving party must establish that it is “plain and obvious” that the claim should not proceed: *R v Imperial Tobacco Canada Ltd*, 2011 SCC 42 [Imperial Tobacco] at para 17; *Hunt v Carey Canada Inc*, 1990 CanLII 90 (SCC) [Hunt] at 980. A motion to strike has been described as a “valuable housekeeping measure essential to effective and fair litigation”: *Sivak v Canada*, 2012 FC 272 at para 15; *Imperial Tobacco* at paras 17, 19.

[4] In determining whether to strike a claim, the allegations of fact in the statement of claim must be taken as true, unless patently ridiculous or incapable of proof: *Imperial Tobacco* at para 24; *Scheuer v Canada*, 2016 FCA 7 at para 12. While the Court will show flexibility towards a person who is self-represented, this does not exempt a self-represented litigant from complying with the requirements for pleading: *Brauer v Canada*, 2020 FC 828 at paras 30-31.

[5] A statement of claim must be supported by material facts, addressing the constituent elements of each cause of action or legal ground raised, such that the defendant and the Court knows on what basis the specific allegations are made: Rules 174 and 181, Federal Courts Rules; *Mancuso v Canada (Minister of National Health and Welfare)*, 2015 FCA 227 [Mancuso] at paras 16-19. The “who”, “when”, “where”, “how” and “what” must be sufficiently pleaded: *Mancuso* at para 19. This includes pleading in a transparent and cohesive manner. A plaintiff cannot simply make general statements and expect the motions judge to sift through the pleading to find the material facts necessary to support the different causes of action alleged: *Bigeagle v Canada*, 2023 FCA 128 [Bigeagle] at para 40.

- [6] Further, bald allegations of bad faith, ulterior motives or ultra vires activities cannot ground a claim. Such extreme allegations must be supported by materials facts, otherwise they will be considered both scandalous, frivolous and an abuse of process: *Tomchin v Canada* 2015 FC 402 at para 22, citing to *Merchant Law Group v Canada (Revenue Agency)* 2010 FCA 184 at paras 34-35.

III. The Amended Claim [7] The Amended Claim is best described as an omnibus claim that includes a series of broad allegations.

- [8] In its overview, the Amended Claim alleges that the RCMP violated the Criminal Code, RSC 1985, c C-46; the Canadian Charter of Rights and Freedoms, Part I of the Constitution Act, 1982, being Schedule B to the Canada Act 1982 (UK), 1982, c 11 [Charter]; the Rome Statute of the International Criminal Court, 17 July 1998, 2187 UNTS 3; the Crimes Against Humanity and War Crimes Act, SC 2000, c 24; the Universal Declaration of Human Rights, UNGA, 3rd Sess, UN Doc A/810 (1948) GA Res 217A (III); and the Declaration of the Rights of a Child, UNGA, 14th Sess, UN Doc A/4354 (1959) GA Res 1386 (XIV).
- [9] The Plaintiff claims that “he and members of his family have been subjected to torture, cruel and unusual treatment and punishment, persecution, homicide attempts, encouragement to commit suicide and slander by way of publishing libels as propaganda in the media”. The Plaintiff asserts that “parties have fabricated and concealed evidence, obstructed the appropriation of justice and the duties of the court”. He further asserts that “parties are wilfully negligent toward their duties to report and have such violated their oaths to serve and protect”.
- [10] He claims that the Crown has breached his right “to be free from discrimination, torture, and cruel and unusual punishment” and that sections 7, 9, 12 and 15 of the Charter have been violated. He further asserts that the Crown is vicariously liable for “tortious accumulation of human rights violations and criminal conduct”, referring to the Crown Liability and Proceedings Act, RSC 1985, c C-50.
- [11] Through his amendment, the Plaintiff adds a series of assertions relating to the Defendant, RCMP, including that:
- Between September 2014 and September 2015, refused to investigate and failed to produce relevant evidence that the Plaintiff was victimized by his parents which instigated an accident between the Plaintiff and Constable Stephen Pinksen.
 - Refusing the Plaintiff necessary medical attention on September 20, 2014.
 - Laying frivolous, vexatious and scandalous charges against the Plaintiff between February 2018 and September 2023 in retaliation against the Plaintiff for the accident involving Constable Stephen Pinksen to fulfill a personal vendetta against the Plaintiff, as was conspired.

- d. Refusing to investigate and/or charge Rebecca Amero for torturing and endangering the life of the Plaintiff and their daughter filing false charges and providing false statements and testimony between April 2018 and March 2024.
- e. Refusing to follow up with witnesses and complaints made against Rebecca Amero by other concerned citizens regarding the well-being of the Plaintiffs daughter.
- f. Corporal Beadreau and Constable Boardman refused the Plaintiff necessary medical attention and instead tortured the Plaintiff in the Digby RCMP Detachment on January 6, 2023 by stripping him off his clothing, locking him in a holding cell to which they turned the air condition on full cold and stood outside the door laughing at him. They refused him food and water and basic necessities. The next morning an officer returned the Plaintiff his clothing stating that he wished to keep his job.
- g. Filing fabricated incident reports on January 6, 2023.
- h. Constable Ouellette and Constable Tingley and other officers unknown to the Plaintiff, tortured the Plaintiff in the Enfield RCMP Detachment on September 14, 2023 by refusing the Plaintiff medical attention after assaulting him, as well as refusing him food and water and toilet paper.
- i. Fabricating evidence, fabricating incident reports and fabricating media releases as propaganda to slander and vilify the Plaintiff in the eye of the public on September 14, 2023. Including enforcing the disappearance of the Plaintiff.
- j. Concealing an audio recorded admission of guilt made by Constable Gary Beifuss that it is “karma” that the RCMP torture, persecute, attempt to murder and leave the Plaintiffs daughter to die at the behest of Rebecca Amero.
- k. Aiding and abetting criminals such as but not limited to Alberta Lumsden, Myrna Lumsden, James Lumsden Sr., Christopher Prud'homme, Trevor Prud'homme, Dawn Taylor, Rebecca Amero, Reanne Comeau, Don Urguhart, Gary Beifuss, James Lowe, Chris Boardman, Cpl. Beaudreau, Peter Theriault, Risk Kronfli and Margaret Morgan that commit offences against the Plaintiff and/or his children between September 2014 and September 2025.
- l. Constable Stephen Pinksen sent threatening messages to the Plaintiff between September 2017 and December 2017.
- m. Refusing to investigate Stephen Pinksens threats towards the Plaintiff when reported to Constable Gary Beifuss of the Digby RCMP Detachment between June 2019 and July 2019.
- n. Constable Welsh of the Digby RCMP Detachment openly admits that he will not investigate complaints made against his detachment despite being assigned by the CRCC(RCMP Civilian Complaints Review Commission “CRCC”) to do so.
- o. Constable James Lowe repeatedly called the Plaintiff between August 2023 and September 2023 to state that the Plaintiff is “scared” and that is why he will not turn himself in.

- p. Constable Stephen Pinksen conspired with inmates and other officers to persecute and murder the Plaintiff between February 2018 and September 2023,
 - q. On January 5th 2023, the Plaintiff shared the evidences in his possession on Social Media to raise awareness to the situation. The next morning on January 6th RCMP attended his residence and encouraged him to commit suicide. The officers told the Plaintiff that nobody cared. The officers proceeded to destroy his door and take him into custody. He was subsequently tortured and incarcerated, which by definition, is enforced disappearance, a crime against humanity.
 - r. In April of 2019, Constable Gary Beifuss and James Lowe attended the Plaintiff's residence after Rebecca Amero made false allegations against the Plaintiff. The Plaintiff informed the officers of the truth and that there was evidence supporting these truthful allegations. The officers laughed at him and stated "We must be saving you then." Although Gary Beifuss noted in his report that there was damage to property as was alleged by the Plaintiff.
 - s. In July 2019, Rebecca Amero forcefully confined the Plaintiff in their residence with a knife and scissors. The Plaintiff was on the phone with a witness at the time who overheard the Plaintiff and Rebecca Amero arguing, and Rebecca refusing to allow the Plaintiff to leave the residence. Constable Gary Beifuss and Constable James Lowe attended the residence once again, and refused to contact the witness to verify what had taken place. Instead, they laughed at him again.
 - t. In November 2022, Officers unknown to the Plaintiff attended the Plaintiffs residence and tactfully arrested the Plaintiff for driving while impaired and driving while prohibited. They arrested the Plaintiff and assaulted him and insulted him during the process. The officers seized the vehicle from private property and took the Plaintiff to the hospital where they forced him to take an unknown substance in a needle, against the request and consent of the Plaintiff for religious reasons to take an oral medication. The Plaintiff was innocent of all allegations yet was forced to accept a plea bargain under duress to obtain his freedom.
- [12] While these assertions are provided in the context of the Plaintiff's general Charter allegation, the Plaintiff does not tie these events and assertions to the specific causes of action later claimed, such that it is unclear which events are specifically alleged to support each cause of action, and how these assertions tie into the remainder of the claim.
- [13] The latter part of the claim remains largely unchanged from its earlier draft. Under the heading "Causes of Action" the claim is divided into two sections: the first section is titled "Systemic Targeting and Negligence"; and, the second section is titled "Breaches of the Canadian Charter of Rights and Freedoms".

- [14] Under the first section, the Plaintiff alleges that he and his children have been subjected to “discrimination, bullying, harassment, torture, persecution, slander, enforced disappearances, among various other human rights violations and crimes against humanity.” He alleges that the Crown, which he now defines as the RCMP, owe him and his children a duty of care to serve and protect, investigate criminal matters, prosecute criminal offences, and guarantee his Charter rights.
- [15] The Plaintiff claims the Crown breached its duty of care by engaging in a numerous list of activities which are broadly identified – i.e., persecuting and torturing the Plaintiff; concealing evidence; spreading propaganda; destroying and fabricating evidence; enforcing the Plaintiff’s disappearance; obstructing the duties of the courts; refusing to investigate criminal offences; obstructing justice; willfully causing undue suffering to his daughter; abusing authority; ignoring, excusing, and condoning sexual misconduct, criminal behaviour and crimes against humanity; deterring law abiding members from reporting criminal misconduct; preventing the Plaintiff from accessing the judicial system; choosing not to adhere to applicable policies, procedures and processes; intimidating the Plaintiff and interested parties into not reporting; deliberately preventing complaints from reaching the attention of senior level officials; promoting violence and human rights violations toward the Plaintiff and his children; engaging in intentional acts of violence, torture, persecution, and defamatory libels toward the Plaintiff; and abusing their position of authority.
- [16] He further alleges that “[s]enior level members and those with oversight responsibilities” also owe a duty of care to the Plaintiff that was breached through additional actions – i.e., choosing not to supervise members or to take reasonable measures to prevent misconduct; imposing a culture that discourages victims from reporting; providing victims with an inadequate reporting mechanism; imposing meaningless sanctions after reports of gross misconduct have been substantiated; providing inadequate internal victim support services; choosing not to apply, or inadequately applying policies on misconduct and behaviour; inadequately investigating complaints; not promoting, or not adequately promoting, meaningful initiatives to prevent egregious human rights violations; condoning the misconduct of their subordinates; wilfully violating their code of ethics; and wilfully participating in crimes against humanity.
- [17] In this second section, the Plaintiff similarly makes broad allegations that the Crown has breached his rights under sections 2, 6, 7, 8, 9, 10, 11, 12, and 15 of the Charter. For each section of the Charter alleged, the Plaintiff asserts that there has been a breach by reciting back the language of the section and then sets out a lengthy list of acts it asserts were conducted.
- [18] As highlighted by this Court, proximity, repetition, and the bare pleading of a series of events are not substitutes for the requirement that a defendant know what is being factually and legally alleged so that a proper answer and defence can be stated: *Wang v Canada*, 2016 FC 1052 at para 31.

[19] Similarly, as noted earlier, a party cannot simply make general statements and expect the motions judge to sift through the pleadings to find the material facts necessary to support the different causes of action: *Bigeagle* at para 40.

[20] I agree with the Defendant, the Amended Claim is fatally defective and largely amounts to bare assertions and confusing allegations. It cannot be left to stand in its current form and as set out further below, it is devoid of sufficient material facts to disclose a reasonable cause of action, contrary to Rules 221(1)(a), (c) and (f).

IV. “Systemic Targeting and Negligence” A. Unlawful Conduct Conspiracy [21] The Plaintiff alleges that “all matters stated in relation to [the] claim are part of a conspiracy to persecute and murder the Plaintiff” and that the Crown and its agents “have intentionally obstructed him from filing his claim”.

[22] As highlighted by the Defendant, for a plaintiff to claim the tort of unlawful conduct conspiracy, the following elements must be present: (a) there must be an act in combination, that is in concert by agreement or with a common design; (b) the conduct must be unlawful; (c) the conduct must be directed towards the Plaintiff; (d) the Defendant should know that, in the circumstances, injury to the Plaintiff is likely to result; and (e) the conduct must cause injury to the Plaintiff: *Cement LaFarge v BC Lightweight Aggregate*, 1983 CanLII 23 (SCC) at 471-72; *Agribrands Purina Canada Inc v Kasamekas*, 2011 ONCA 460 at para 26.

[23] The Plaintiff asserts that Constable Pinksen conspired with inmates and other officers to persecute and murder the Plaintiff. He asserts that there were “frivolous, vexatious and scandalous charges against the Plaintiff between February 2018 and September 2023 in retaliation against the Plaintiff for the accident involving Constable Stephen Pinksen to fulfill a personal vendetta against the Plaintiff, as was conspired”. However, he does not identify the charges in issue, why he believes the charges are problematic, what the “accident” between him and Constable Pinksen entailed, or how this relates to an alleged conspiracy.

[24] The Amended Claim refers to a number of individuals but does not specify who is alleged to be involved in the conspiracy with Constable Pinksen, the nature of the specific agreement and the specific acts that form the conspiracy, or how any alleged acts furthered such an agreement to injure the Plaintiff. The elements for conspiracy have not been alleged.

B. Negligence [25] To be successful in a claim for negligence, a plaintiff must prove that: (1) the defendant owed the plaintiff a duty of care; (2) the defendant’s conduct breached the standard of care; (3) the plaintiff sustained damage; and (4) the damage was caused, in fact and in law, by the defendant’s breach: *1688782 Ontario Inc v Maple Leaf Foods Inc*, 2020 SCC 35 at para 18.

- [26] In the Amended Claim, the Plaintiff broadly asserts that the RCMP and its members owe him and his children a duty of care to serve and protect, investigate criminal matters, prosecute criminal offences, and guarantee his Charter rights. However, as noted in *Bigeagle* at paragraph 69, the RCMP's governing legislative scheme demonstrates that the RCMP's duty is owed to the public in general. It does not provide for a private duty of care to any particular member of the public.
- [27] As recently reiterated in *D.C. v Canada*, 2025 FCA 215 [D.C.] at paragraph 7, "in conducting an investigation the police do not owe a private law duty of care to the victims of crime or members of their family. The role of the police is to protect the public as a whole, and it is to the public as a whole that their duties are owed".
- [28] To determine whether a new duty of care should be recognized, a plaintiff must establish that the facts (1) disclose a *prima facie* duty of care, that is, a relationship of proximity which makes it just and reasonable to impose an obligation to take reasonable care to prevent foreseeable harm; and (2) if there are any policy reasons why this *prima facie* duty of care should not be recognized: *Bigeagle v Canada*, 2021 FC 504 at para 87, citing to *Paradis Honey Ltd v Canada (Attorney General)*, 2015 FCA 89 at paras 47-48; *D.C.* at para 4, citing to *Cooper v Hobart*, 2001 SCC 79.
- [29] The Amended Claim does not establish how the relationship between the RCMP and the Plaintiff grounds a new private law duty of care. While a duty of care has been recognized between police and a suspect under investigation (*Bigeagle* at para 70, citing to *Hill v Hamilton-Wentworth Regional Police Services Board*, 2007 SCC 41 [Hill]), if this is the allegation, the details of any such investigation and other critical facts are missing, and are also unclear from the series of events described earlier in the claim.
- [30] Further, to plead the tort of negligent investigation as a suspect, the Plaintiff must plead the following constituent elements: (1) that criminal proceedings were initiated by the Defendant; (2) the proceedings were terminated in favour of the Plaintiff; (3) there was an absence of reasonable and probable grounds to commence proceedings against the Plaintiff; (4) in conducting the investigation the Defendant owed a duty of care to the Plaintiff and did not meet the objective standard of a reasonable police officer in similar circumstances; and (5) in a case where charges were pursued, that the criminal proceedings were terminated in the Plaintiff's favour: *Fitzpatrick v Codiac Regional RCMP Force*, District 12, 2022 FC 841 at para 49.
- [31] Here, the Plaintiff has not identified the specific criminal proceedings and charges he challenges, nor has he pled material facts to support the second and third elements of the tort. While the Plaintiff refers to the police filing false charges and providing false statements between April 2018 and March 2024, he does not identify the charges in question, nor does he provide the facts to establish that any charges were unlawful. The Plaintiff refers to being charged with impaired driving and asserts that he was innocent and was coerced to accept a plea bargain. However, such assertions are insufficient to ground the

elements of the tort. A loss or injury from alleged police negligence cannot be established unless it is clear the criminal proceedings were wrongful and terminated in favour of the Plaintiff: Hill at para 97. The facts alleged do not support an allegation of negligent investigation.

V. The Alleged Charter Breaches [32] To establish a valid claim under subsection 24(1) of the Charter, a plaintiff must establish that: (a) there is a breach of his rights under the Charter; and (b) there is functional justification for an award of damages for breach of those rights in the specific facts of the case: Vancouver (City) v Ward, 2010 SCC 27 at para 4.

[33] As noted in Mancuso:

[21] There are no separate rules of pleadings for Charter cases. The requirement of material facts applies to pleadings of Charter infringement as it does to causes of action rooted in the common law. The Supreme Court of Canada has defined in the case law the substantive content of each Charter right, and a plaintiff must plead sufficient material facts to satisfy the criteria applicable to the provision in question. This is no mere technicality, “rather, it is essential to the proper presentation of Charter issues”: Mackay v Manitoba, 1989 CanLII 26 (SCC), [1989] 2 S.C.R. 357 at p. 361.

[34] The Amended Claim does not plead the elements of each Charter right, nor does the Plaintiff allege specific facts to demonstrate how the Defendant’s actions constitute a breach of each of the Charter rights asserted. Like the deficiencies noted above, the Amended Claim makes broad assertions that certain actions violate Charter rights, without elaboration or specification. None of the items in the list include dates or details as to the “when”, “where” and “how” of the allegation and it is unclear how the lengthy lists correspond to the series of events and assertions outlined earlier in the claim. Key linkage is missing.

[35] As noted by the Defendant, there are also specific deficiencies with each of the Charter claims made:

Section 2(b) protection may not extend to certain methods or locations of expression. The Amended Claim provides no detail on the content, method, or location of any alleged expression.

Section 6(2)(b) must be read with s. 6(3), which is intended to allow the creation of wealth in a province other than one’s province of residence (Canadian Egg Marketing Agency v Richardson, 1997 CanLII 17020 (SCC), [1998] 3 SCR 157, at para 75). It is not a standalone right to pursue as the Amended Claim advances.

For section 7, no material facts are pled that address the principles of fundamental justice, either procedural or substantive (see Al Omani v Canada, 2017 FC 786 [Al Omani] at para 108).

For sections 8 and 9, the Amended Claim does not include material facts addressing any unlawfulness from a search and seizure or arrest (R v Collins, [1987] 1 SCR 265 at para 23; R v Hufsky, [1988] 1 SCR 621 at paras 12-13).

The Plaintiff has not established how section 11 is applicable as the RCMP is not responsible for prosecuting offences or granting bail.

For section 12, there are insufficient material facts pled to establish that treatment received is either grossly disproportionate or intrinsically incompatible with human dignity (R v Bissonnette, 2022 SCC 23 at para 60).

The Amended Claim does not plead an enumerated or analogous ground of discrimination and provides insufficient facts to show adverse impact on such an enumerated ground, which is required for section 15 (Fraser v Canada (Attorney General), 2020 SCC 28 at para 27; Al Omani at para 109).

[36] I agree with the Respondent that in view of these flaws, a breach of Charter rights cannot be established and the claim for Charter damages cannot succeed.

VI. Requested Remedies [37] The Plaintiff's claim for remedies is equally vast and problematic. He claims remedies that are either not applicable (certification under the Crown Liability and Proceedings Act), unsupported by material facts (general damages; special damages; damages under subsection 24(1) of the Charter; aggravated, punitive and exemplary damages) or unrelated and that extend beyond the available relief from this Court (recovery of health care costs incurred by the Nova Scotia Department of Health pursuant to the Health Services and Insurance Act, RSNS 1989, c 197; custody of children; new identification for the Plaintiff and his children; a valid driver's license).

[38] In my view, the Amended Claim cannot stand as drafted as it lacks the materials facts to support the causes of action claimed and is confusing and impossible for the Defendant to answer. The outstanding issue is whether further leave to amend should be granted.

VII. Should Leave to Amend be Granted? [39] As set out in Simon v Canada, 2011 FCA 6 [Simon] at paragraph 8, leave to amend may be denied only if it is plain and obvious that the defects cannot be cured by amendment. Unless there is no scintilla of a cause of action, the claim should not be struck: Al Omani at para 34, citing to Hunt at 976-97; Simon at para 8; Collins v Canada, 2011 FCA 140 [Collins] at para 30.

[40] When determining whether to grant leave to amend, it is relevant to consider: (a) the history of the pleadings in issue, particularly with regard to past amendments (or past attempts to amend) those pleadings; (b) any formal particulars provided by the party whose pleadings are challenged; and (c) any other evidence submitted by that party to establish that the pleadings are capable of being amended to cure the deficiency: Heli Tech Services (Canada) Ltd v Weyerhaeuser Company Limited, 2011 FCA 193 at para 25.

[41] In this case, the Plaintiff was previously informed by the Court in the Order from the first motion to strike that a cause of action cannot succeed without sufficient material facts and that bald allegations are vexatious when they are not supported by material facts (see paras 22-23). However, fundamental deficiencies in the claim still exist. In my view, the gaps that remain suggest defects that are more than simply drafting deficiencies, but rather

deficiencies that go to the core of the claim, such that it cannot be concluded that a justiciable claim can be advanced by the Plaintiff as against the Defendant in respect of the causes of action alleged: Bigeagle at para 102; Michel v Canada (Attorney General), 2025 FCA 58 at para 79.

[42] In this circumstance, it is my view that it is appropriate to strike the Amended Claim without further leave to amend.

[43] As the Defendant has been successful on this motion, they are entitled to costs. The Defendant requests an award of costs in the amount of \$500, which I consider to be appropriate in the circumstances.

ORDER IN T-1750-25

THIS COURT ORDERS that:

The motion is granted.

The Amended Statement of Claim is struck without leave to amend.

The Defendant shall have its costs in the amount of \$500.

"Angela Furlanetto"

Judge

FEDERAL COURT

SOLICITORS OF RECORD

DOCKET:

T-1750-25

STYLE OF CAUSE:

CODY ANDREW PRUD'HOMME v HIS MAJESTY THE KING

MOTION IN WRITING CONSIDERED AT OTTAWA, ONTARIO PURSUANT TO RULE 369 OF THE
FEDERAL COURTS RULES

ORDER AND REASONS:

FURLANETTO J.

DATED:

DECEMBER 8, 2025

WRITTEN REPRESENTATIONS BY

Cody Andrew Prud'Homme

For The Plaintiff

(ON HIS OWN BEHALF)

Emily Crompton

For The Defendant

SOLICITORS OF RECORD:

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For The Defendant

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