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Rule 301

Notice of Application

FEDERAL COURT

Judicial Review

(Simplified action under rule 292: SIMPLIFIED ACTION)

BETWEEN:

Bejia Auger

Applicant

and

Ministry of Justice and Attorney General of Canada

and Canada Revenue Agency (CRA)

Respondent(s)

(Court seal)

Notice of Application

TO THE RESPONDENT:

A PROCEEDING HAS BEEN COMMENCED by the applicant. The relief claimed by the applicant appears on the following page.

THIS APPLICATION will be heard by the Court at a time and place to be fixed by the Judicial Administrator. Unless the Court orders otherwise, the place of hearing will be as

requested by the applicant. The applicant requests that this application be heard at *The Federal Court of Canada, 180 Queen Street W, Toronto, Ontario.M5V 1Z4.*

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or a solicitor acting for you must file a notice of appearance in Form 305 prescribed by the [Federal Courts Rules](#) and serve it on the applicant's solicitor or, if the applicant is self-represented, on the applicant, WITHIN 10 DAYS after being served with this notice of application.

Copies of the [Federal Courts Rules](#), information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO OPPOSE THIS APPLICATION, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU.

May 20, 2022.

Issued by: *(Registry Officer)*

Address of local office:

TO: Ministry of Justice and Attorney General of Canada
c/o Ontario Regional Office
120 Adelaide Street, West, Suite 400
Toronto, Ontario. M5H 1P1

AND: Revenue Agency
Sudbury, TSO/TC
1050 Notre Dame Avenue
Sudbury, ON. P3A 5C2
Fax: 1-705-670-5483
Web site: canada.ca/taxes

Application

The Federal Court of Canada,
180 Queen Street, W.,
Toronto, Ontario. M5V 1Z4

This is an application for judicial review in respect of

The Ministry of Justice and the Attorney General of Canada, and
Canada Revenue Agency (CRA)

given Canada Revenue Agency's CERB/CRB 2nd assessment claim(s) and decision(s) dated April 20, 2022, authored by Donna Boivin, Manager Canada Emergency Benefits Validation (CEBV), and sent by applicant's CRA "my account" e-mail, received by Applicant as of April 20, 2022, stating:

Advising Applicant, Bejia Auger, of Canada Revenue Agency's (CRA) "Denial decision" on 2nd review of applicant's Canada Recovery Benefit (CRB) claim(s) of October 10, 2020; as well as Canada Revenue Agency's (CRA) "Denial decision" on the 2nd review of applicant's Canadian Emergency Response Benefit (CERB) claim(s) of May 14, 2020. Both above CRA CRB/CERB claim denials were issued April 20, 2022 by Donna Boivin, CRA Manager, (CEBV), stating the following 2 decisions:

1) " RE: CANADA EMERGENCY RESPONSE BENEFIT (CERB) notice":
(written April 20, 2022)

*"Based on our review, you are not eligible. You did not meet the following criteria:
You did not earn at least \$5,000 (before taxes) of employment or self-employment
income in 2019 or in the 12 months prior to the date of your first*

application. As you did not meet the eligibility criteria to qualify for CERB, your application has been denied.

2) " RE: CANADA RECOVERY BENEFIT (CRB) notice".
(written April 20, 2022)

"Based on our review, you are not eligible. You did not meet the following criteria: You did not earn at least \$5,000 (before taxes) of employment or net self-employment income in 2019, 2020, or in the 12 months before the date of your first application.

3) THEREFORE: (CRA decision continues) " If you have received a CERB/CRB payment that you were not eligible for, you will be required to repay the amount. If you disagree with the result of the second review, you may apply to the Federal Court for a judicial review."

The Applicant makes application for:

- 1) Review, by the Court, of applicant's eligibility for CERB based on original CRA legislation, posted on official CRA websites, as of applicant's May 10 2020 claim; stating requirement of "*must earn at least \$5,000 (before taxes) of employment or self-employment income in 2019 or in the 12 months prior to the date of your first application*".
- 2) Review, by the Court, of applicant's eligibility for CRB based on original CRA legislation, posted on official CRA websites, as of applicant's October 10, 2020 claim; stating requirement of "*must earn at least \$5,000*

(before taxes) of employment or self-employment income in 2019 or in the 12 months prior to the date of your first application”.

- 3) Review, by the Court, of CRA’s 2nd Assessor(s) direct instructions to Applicant (by phone calls/notice), during applicant’s 2nd assessment period (on, or about March through May, 2022) requiring applicant to falsely re-adjust applicant’s 2020 Income Taxes (filed on, or about May, 2021) to reflect a “Net” Income of \$5,000 before CRA 2nd Assessor(s)-(1st-Steffany, 1-249-377-6612; 2nd-Christina, 1-249-377-6035; and 3rd-Donna Boivin, Manager, CEBV.) would approve applicant’s 2020 CRB claim.
- 4) Review, by the Court, of applicant’s CRA CERB/CRB “Self-employment Business Income” statute(s), verses Rental Income statute(s), in accordance with CRA's own Regulations posted on the CRA website for client information/guidelines.
- 5) Review, by the Court, of applicant’s 1st filing of *Application for Judicial Review, File# T-1022-21* (filed June 28, 2021), which was withdrawn in accordance with a mutual agreement between Applicant and Attorney General (legal counsel for CRA) on the agreement to return applicant’s CERB and CRB claims back to CRA for 2nd review, based on specific *Minutes of Settlement* with Schedule A (1) and B (2) attachments to this agreement in return for Applicant’s withdrawal of said 1st *Application for Judicial Review File # T-1022-21*.

- 6) Review, by the Court, of said Withdrawn of applicant's 1st Judicial Review of File #T-1022-21 filed with the court on or about February 15, 2022.
- 7) Review, by the Court, of said "Minutes of Settlement" and Schedule A and B attachments. Applicant requests the Court's opinion on CRA's conduct in accordance with said mutual legal agreement, noting any violations of this mutual legal agreement, by CRA 2nd Assessors, during applicant's 2nd (re-) assessment of CRA CERB/CRB claim.
- 8) Review, by the Court, of reinstatement of all qualifying CERB and CRB benefits, to date, from applicant's original claim dates of CERB-May 14, 2020, and CRB-October 10, 2020. This evaluation review should also include all qualifying dates past the time that CRA froze applicant's "my account" CRB website (based on CRA's 1st rejection letter of December 29, 2020) which eventually made it impossible for applicant to continue registering for each additional qualifying 2-week CRB period on-line (as of approximately June of 2021).
- 9) Review, by the Court, of all claims, correspondence, agreements and, or filings pertaining directly to applicant's CRA-CERB/CRB claims, inclusive of all Attorney General-CRA Counsel correspondence, agreements and filings related to applicant's 1st/2nd Application(s) for Judicial Review. This, to ascertain any possible presence of malfeasance, poor intent and, or

improper conduct legislatively, on the part of CRA throughout applicant's claim(s) for CERB/CRB to date. Applicant seeks Judicial Remedy for such actions should the Court find so.

10) Applicant seeks relief of all CERB/CRB unqualified debt and, or interest, claimed by CRA, as per claims for re-payment of funds stated in CRA's April 20, 2022 notice(s) of denial; this being in accordance with any/all adjustments and recommendations, by this Court, to Applicant's eligibility to applicant's CERB/CRB benefits (both paid/reinstated and, or owed).

11) In such a case, should the Court deem, in all or in part, in favor of CRA's April 20, 2022 claim of monies owed by the Applicant (in any/all of the above matters), the Applicant requests relief in the form of time to repay any required amounts, deemed to be owed to CRA, in accordance with this Courts recommendation(s) of any, or no monies owed.

12) Applicant seeks Costs and Compensations, directed by the Court, should applicant's CERB/CRB claim(s) be found legal and payable by CRA. Applicant requests that said costs be calculated at the time of hearing and be decided by the Court; and those costs will include all related debt, related interest costs, and consider undue pain and suffering caused to the applicant and applicant's life; having been involuntarily forced on applicant

direct due to CRA's continuous denials of claim and conduct, should this be deemed in bad faith and legislatively improper.

The grounds for the application are: *(State the grounds to be argued, including any statutory provision or rule relied on.)*

1) and 2) Applicant argues:

Regarding Applicant's CERB (1) and CRB (2) qualifying applications (in accordance with May 14, 2020 CERB and October 10, 2020 CRB CRA guidelines), Applicant did earn over \$5,000 in Self-employment Income in the 12 months prior to applying for CERB, on May 14, 2020. Applicant's Self-employment Income prior to CERB application was \$7,812.50, from January 1 to May 14, 2020. Applicant did, therefore, earn over \$5,000 in Self-employment Income in the 12 months prior to applying for CRB, on October 10, 2020.

Both applicant's CERB/CRB were claimed in accordance with CRA's CERB/CRB website Regulations and Guidelines posted from May to October, 2020, which stated *"must earn at least \$5,000 (before taxes) of employment or self-employment income in 2019, 2020, or in the 12 months before the date of your first application"*.

Applicant's CERB/CRB Self-employment Incomes were again provided to CRA

after CRA's December 29, 2020 denial letters were issued to applicant. CRA cancelled all further CRB benefits as of December 19, 2020 (to date).

Applicant asserts that CRA's commencing of applicant's CRB payments, October 10, 2020, on CRA's receipt and acceptance of applicant's proof of income in October 2020, demonstrates CRA's acceptance of applicant's application "in accordance with specific CRA CRB legislative requirements as posted on CRA website, as of that date.

However, in CRA's December 29, 2020 CERB/CRB denial letters, CRA changed the wording of the CRB requirements by adding the word "Net" to the originally posted CRA legislative requirements and regulations. CRA had changed their requirements to now read *"must earn at least \$5,000 (before taxes) of employment income or self-employment net income in 2019, 2020, or in the 12 months before the date of your first application"*. Understanding that CRA is able to make changes to legislation, throughout time, this change in self-employment "net" income was first implemented on, or about December 29, 2020, and clearly pertains to "before the date of your first application", which does not apply to applicant's application which had been accepted and commenced October 10, 2020-months before this change in legislative wording. Applicant was, therefore, already qualified for CRB, by CRA, under the legislative regulations of the original application time (October 2020).

In addition, although CRA implemented this new "net income" clause into their

CRB legislation, in late December 2020 to early 2021, CRA failed to inform CRB claimants of this change, and in turn, also failed to change some of their mainstream Legislative Regulations and Guidelines web pages from the (said) original October 2020 legislation to the new/changed legislation requiring “net income”. Therefore, throughout 2021 mainstream CRA Legislative Regulations and Guidelines/CRB websites continued to display the original wording of *“must earn at least \$5,000 (before taxes) of employment or self-employment income in 2019, 2020, or in the 12 months before the date of your first application”*.

Regardless of these facts and errors, CRA chose to implement it’s new “net restriction/requirement on (not only new CRB applications) all CRB/CERB claims “retroactively”, hence applicant’s December 29, 2020 denial/claw back notice. Legal challenges against CRA’s actions soon caused a formal retraction, by CRA, of all CERB claims rejected/reversed under the same attempt by CRA to retroactively claw-back paid 2020 CERB claims. However, CRA is not providing the same retraction and relief for early CRB claims implemented under the original Legislations; rather, CRA is retro-actively holding (old legislative) benefit responsible to the new-convoluted legislation poorly implemented months after the fact. There are laws governing CRA’s requirements and responsibilities under these actions and circumstances, of which applicant will argue. Materials intended to be used, by applicant in argument are:

- Legislative Rules of “Officially Induced Error”

- CRA Legislative Regulations & Guidelines for CERB/CRB (as of May-Oct. 2020).
- CRA Policy on Providing Guidance on Regulatory, Interpretation and Implementation of Change requirements.
- CRA “My Account” correspondence and filings.
- Mutual legal agreement re: 2nd assessment Feb. 2020 “Minutes of Agreement” including Schedules A and B.
- Government of Canada Questions & Answers on CERB/CRB.
- The Canadian Revenue Agency’s Policy on Providing Guidance on Regulatory Requirements-Canada.ca.
- Further legal rulings pertaining to this issue may be presented.

3) Applicant also argues:

Applicant’s 2nd assessment was passed around between 3 different 2nd assessors, contrary to the mutual agreement that applicant’s 2nd assessment would be handled by a senior CRA agent. Applicant was informed, by phone, by 1st second assessor (Stefanny) that applicant would have to re-do applicant’s 2020 Income Taxes to show a \$5,000 “net” income, filing the Adjustment with CRA and in return, the 2nd assessor would approve my CRB claim immediately. This did not sound proper to applicant. Applicant contacted her Income Tax Agent and inquired about this CRA direction.

Applicant was informed by her Income Tax Agent, that this did not sound legal.

As applicant’s 2020 Income Taxes had been professionally prepared and filed in

June of 2021, this would mean that a new fraudulent T-1 Adjustment would have to be prepared eliminating and affecting the following: (Re: CRA's direction)

- Write-off \$3,362.00 in Homestay monthly rental Business expense claims, and write-off \$1,687.00 in Capital Gains Costs, to show a false \$5,000 net income;
- Applicant would owe an additional \$900.00 (approx.) in 2020 Income Tax;
- This adjustment would negatively affect applicant's Trillium and GST for 2022;
- This adjustment would negatively affect applicant's monthly pension benefits, wiping out applicant's monthly OAP-Supplement.
- CRA assessors are basically requiring applicant to "re-apply" for CRB under the 2022 rules. The new legislation does not require that established applicant (already receiving CRB) to re-apply for CRB, again, under the new legislative rules. The new legislation only requires "new applicants to apply under the new 'net income' regulation, as is stated *"must earn at least \$5,000 (before taxes) of self-employment net income in 2019, 2020, or in the 12 months before the date of your first application"*.

The date of applicant's "first applications were CERB-May 14,2020/CRB-Oct 10,2020. Applicant sent a detailed letter, including supporting documents, by CRA "My Account" e-mail, to CRA 2nd assessor (Christina) whom was also requiring this said T-1 Adjustment before accepting my CRB claim. Applicant was told assessor would contact applicant after receiving this e-mail. Applicant was not contacted, and on this April 20th, applicant received the 2 "My Account" e-mail

letters (from a third 2nd assessor, Donna Boivin) again denying both applicant's CERB and CRB; both listing the same non-descript reason stating "*You did not earn at least \$5,000 (before taxes) of employment or net self-employment income in 2019, 2020, or in the 12 months before the date of application*". Donna Boivin also stated "*Further to our conversation on March 22, 2022, we did not receive the documents requested to confirm your CERB eligibility*". This statement is referring to CRA's requirement for applicant to re-write her 2020 Income Tax, which applicant did not feel was proper, or legal. Applicant felt coerced, by CRA, into losing thousands of dollars in warranted credits and benefits in return for securing her CERB/CRB benefits, of which applicant already fully qualified for.

Materials intended to be used, by applicant in argument are:

- "Minutes of Agreement" with Schedule A and B;
- Taxation Information
- 2020 and 2021 CRA CERB/CRB Legislation
- Additional Legislative Rulings and Requirements (as listed in #1 and #2 above).

4) Applicant also argues:

In CRA's 1st Assessment denial (May 14, 2021), CRA claimed that applicant "did not earn \$5,000 in self-employment income prior to first application" because

CRA stated they deemed my income as rental income vs Business Income. I have an International Homestay Program for Western University and Medical International Interns of University Hospital. I have explained, in great detail, the facets of my business, of which the rental accommodation portion of the business is “incidental” to the program and services supplied to each client. Although CRA has not clarified “why” they are stating applicant has not made \$5,000 income/net income” applicant will present this issue, in detail, to the Court in the case that CRA is continuing to incorrectly classify my Business as Rentals.

Materials intended to be used, by applicant in argument are:

- Correspondence e-mail(s) sent to CRA (2021/2022) by CRA “My Account”.
- Government CRA Legislation governing Business vs Rental Income.

5. Applicant also argues:

Applicant has already filed a 1st Application for Judicial Review, File#T-1022-21 on June 28, 2021. The hearing for this file was close to being set when the applicant and legal representation for CRA came to the above-mentioned mutual agreement, out of court, signing a “Minutes of Agreement” with Schedules A/B returning my CERB/CRB claims to CRA for 2nd assessment, in exchange for applicant’s agreement to withdraw her Judicial Review File # T-1022-21 (withdrawn Feb. 15, 2022). Legal counsel for CRA assured applicant that the 2nd assessment would be conducted in accordance with our mutual agreement,

and details; and therefore, would not be handled in the manner the 1st assessment was. This has not happened. CRA has violated our agreement, acting and responding in the exact same conduct and non-specific denial notices as past conduct/responses. Applicant argues that CRA has acted in an irresponsible manner given their position of power and legislative responsibilities in dealing with clients/this applicant in a fair and just manner. Applicant also requested that Assessors, put in writing, their request for applicant to file a \$5,000 net income adjustment on 2020 Income Taxes; however, Stefanny and Christina (2nd assessors) refused to put their requirement for Tax adjustment in writing, stating that they can only speak to applicant on the phone, not by e-mail. In the outline of CRA's duties and responsibilities it clearly states that CRA must answer all written request, but these assessors refused to communicate their requirements in writing. This was very unsettling, so applicant continued to document information by "my account" e-mail, even though she was discouraged from doing so, by 1st two 2nd assessors. Applicant states that there should be a penalization for CRA's continued conduct, should it be found to be in violation of CRA regulations and responsibilities, as well as in violation of mutual agreement. Materials intended to be used, by applicant in argument are:

- Correspondence from Applicant's CRA "My Account".
- "Minutes of Agreement" signed by both parties in settlement of File# T-1022-21.

- Correspondence between applicant and legal representation for CRA 2021.
- Legislation governing conduct and responsibilities to a legal mutual agreement.

6. Applicant also argues:

The mutual agreement of which the withdrawal of applicant's 1st Judicial Review, File #T-1022-21, on, or about February 15, 2022, was based on has be grossly violated by

CRA against the Minutes of Agreement (with Schedules A/B).

The applicant is 67 years of age, with permanent disabilities, which include (but is not limited to) chronic pain and fatigue. CRA has placed this applicant in an extremely vulnerable position of which she must self-represent in Federal Court against CRA and the Attorney Generals Lawyers in effort to secure applicant's rights to properly claimed benefits, while struggling to hold on to her health, her finances and her Business CRA unduly refuses to recognize.

Now, CRA has not complied with the legal agreement governing their 2nd assessment, responding identical to their 1st denial-May 2021. By negating said mutual agreement CRA has successfully started the (2nd) lengthy legal process all over. Applicant was unconfident she could trust such an agreement with CRA, but was assured by CRA legal counsel that the agreement would be upheld. CRA ended untrustworthy in this circumstance. Applicant states that CRA's handling of these claims and all efforts to reasonably resolve these claims, has been beyond any legislative/mortal boundaries,

File # _____

which has devastated applicant's physical, mental and financial abilities, carelessly.

Materials intended to be used, by applicant in argument are:

- February 15, 2021 Withdrawal of applicant's 1st Judicial Review, File # T-1022-21;
- "Minutes of Agreement" with Schedule A/B signed about Feb. 12, 2022;
- Correspondence sent to CRA, through CRA "My Account" for 2nd assessment, in accordance with mutual agreement.
- Medical verification of on-going health condition and exasperations.
- Correspondence between applicant and CRA legal counsel in 2021.

7) Applicant also argues:

The "Minutes of Agreement" as signed and mutually agreed upon by applicant and respondent's legal counsel as the basis of agreement governing the 2nd CRA CERB/CRB full reassessment, in exchange for applicant's withdrawal of 1st Application for Judicial Review, is now in dispute as a dishonored agreement by CRA. This issue will be argued in line with #6.

8) Applicant also argues:

As of CRA's 1st CERB/CRB denial notice(s), to applicant, mailed during Covid-December 29, 2020 (received about January 18, 2021), CRA put a freeze on applicant's CRA-CRB website used to register applicant's CRB claim for each

on-going 2-week period of CRB. Applicant addressed this freeze with the CRA agent, by phone, stating that applicant should still be able to register on-going qualified claims despite not actually receiving the payments, as the denial was now in dispute in Federal Court. The CRA agent stated that should the applicant be successful in her Judicial Review, applicant's CRA-CRB claims would be reinstated, and the on-going CRB claims (unable to be registered) would also be reinstated. On 2 occasions, applicant was able to maneuver the CRA website to register further CRB claims. After that, applicant was unable to access the CRB registration any further. Applicant argues that all on-going 2-week period claims be reinstated and made payable by CR9A, should this Judicial Review deem applicant's claim to be legislatively warranted and enforceable.

Materials intended to be used, by applicant in argument are:

- CRA-CRB Legislation
- Accounting of each on-going 2-week period applicant qualifies for registration and payment of on-going CRB coverage from December 29, 2020 to date.

9) Applicant also argues:

Applicant has conducted herself in a fair and cooperative manner throughout this exasperating ordeal. Applicant has provided any/all proper information required by CRA, and has held to the mutual agreement signed February 15, 2022.

However, applicant argues that CRA has not dealt in good faith with applicant,

nor in a legislatively mandated manner. CRA has violated the mutual agreement signed February 15, 2022. CRA has refused proper communication, given false direction, and, or acted in proper conduct, in dealing with and, or processing/evaluating applicant's claim(s).

CRA assessor made it very clear to applicant, in 1st assessment, that "CRA is rejecting your claim, and if you don't like it, you can sue us". Applicant asserts that CRA is very aware how difficult, to impossible, it is for any layman/citizen to successfully navigate the Federal procedures required to "fight CRA in court".

Applicant submits that this is a "game plan" on CRA's part, especially now that they have violate the legal Settlement agreement; designed to keep applicant in a (2nd) court proceedings for years until applicant can no longer continue.

Applicant declared that this is not a "legal strategy or game" to applicant; this is applicants' life, work and health (physical/psychological) at stake. Now, CRA has failed to honor a mutual settlement agreement which allotted CRA the benefit of a withdrawn Federal Assessment in return for a fair 2nd assessment based on the "Minutes of Settlement" agreed on and signed by CRA's legal counsel, on, or about February 15/22. Applicant argues that CRA has abused their legislative power, and has provided the applicant, and this Court (in 1st Review) with false statements/evidence and direction.

Applicant has no faith left, in CRA's ability or intention to conduct themselves in good faith, nor a legislatively responsible manner in this case; therefore,

applicant turns her eyes to this Court. Applicant will not secure in any further, or future negotiations for out of court settlement, which may be presented by CRA's legal counsel in the future. Applicant must rely solely on this Court for your just review of this case.

Applicant views CRA's on-going (now 18 month) conduct as intentional to force applicant (layman) into an extremely complicated Federal Court filing, self-represented against Government Attorney General Lawyer(s), now for the 2nd time, to defend simple CERB/CRB claim(s). These benefits existed to assist self-employed individuals throughout COVID; but, have ended up straining applicant's financial survival to the point of high interest loans and possible bankruptcy, consuming applicant's time, health, finances and stress levels with continuous legal battles and ill intent actions by CRA. All of which are harming applicant's ability to continue functioning on a day-to-day basis while struggling to keep applicant's business going pending outcome of a proper legal resolve to these claims. Applicant argues that CRA should be held responsible for their actions, and non-actions in this entire matter; and, that applicant should be duly compensated in accordance, should the Court find CRA's conduct negligent.

Materials intended to be used, by applicant in argument are:

- The Canadian Revenue Agency's Policy on Providing Guidance on Regulatory Requirements-Canada.ca;

- CRA Legislative Rules and Regulations, governing CRA responsibilities and conduct;
- Documentation from applicant's 1st Judicial Assessment Court filings/papers;
- Letter address to Peter Fragiskatos, MP-London North, dated June 09, 2021;
- Correspondence from applicant's CRA "My Account" e-mails;
- Any such further materials needed to be relied upon.

10) Applicant also argues:

That CRA do adjust applicant's debt and repayment states, on CRA "My Account", should the Court deem that applicant qualifies for her CERB/CRB claims, in part or in full, and therefore, does not owe repayment to CRA for any, all qualifying claims.

11) Applicant also argues:

Should the Court find applicant to be in arrears and, or owing CRA benefit repayment(s) due to CERB/CRB disqualification, applicant requests relief of any attached interest, and arrangements for any said amounts to be paid over time; as applicant has suffered impoverishment financially due to these unresolved claims and am unable to provide any significant payment(s) up front due to poor financial status.

12) Applicant also argues:

That, should the Court find CRA negligent in their dealings and actions regarding all of the differing facets of these CERB/CRB claims, dealings and Court case(s) (1/2), that the Court will respectfully evaluate a fair and proper monetary compensation value which reflects any/all CRA (said) negligence.

Applicant has suffered serious debt and high loan interests directly due to these prolonged claims proceedings, in attempts to keep applicant's business, home, and health "a float" while awaiting resolve (1.5 years to date). Applicant is now facing the real possibility of having to file for Bankruptcy, and in turn losing applicant's home and business, and ability to find alternative decent residency with a ruined Credit Bureau. Due to applicant's permanent disabilities (since 1994) it is imperative to have a proper residence to support applicant's health needs. This will be difficult, to impossible given the financial state which these CERB/CRB claim disputes have created.

Materials intended to be used, by applicant in argument are:

- Documentation verifying debts and costs suffered by applicant was a direct result of these CERB/CRB on-going denials/disputes and Court proceedings;
- Documentation verifying inclusive monthly high interest costs, suffered and paid by applicant (since January 2020-to date-on going) caused by necessary supplementary monies necessary for month-to-month costs of continuing

- applicant's business and homestay, in lieu of withheld/denied CERB/CRB claims of which applicant claims she was fully qualified for;
- Medical documentation outlining applicant's permanent disabilities (since 1994);
- Applicant's and Respondent's sworn testimony given in 1st Judicial Review;
- Further, Rules and Legislation pertain to determining negligence and reasonable compensation.
- Correspondence between applicant, CRA and, or CRA legal counsel.

The Applicant leaves the above matters, respectfully, in the hands of this Federal Court.

May 20, 2022.

Bejia Auger,
6-145 North Centre Road,
London, Ontario. N5X 4C7
1-519-702-2241

bejia2ndwinds@hotmail.com

Applicant.



Bejia Auger

ATTORNEY GENERAL OF CANADA

(Re: Department of Justice Canada Ottawa Tax Law Litigation Section Bank Street, Suite 1100 Ottawa, Ontario Canada K1A 0H8)

Ministry of Justice and Attorney General of Canada
c/o Ontario Regional Office
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Counsel for the Respondent

AND: Revenue Agency
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Respondent

.SOR/2004-283M ss, 35m 38

.SOR/2013-18, s. 16