

FORM 14A, COURTS OF JUSTICE ACT, STATEMENT OF CLAIM (GENERAL)

ALLAN DOUGLAS WILSON, PLAINTIFF (SELF-REPRESENTED),

AND

OTTAWA POLICE SERVICE BOARD,

ANNE TARDIF,

GOWLING WLG (CANADA) LLP,

DEFENDANTS.

STATEMENT OF CLAIM

TO THE DEFENDANT

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made 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 associated costs to be determined, 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 for costs and have the costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date .....December 8, 2025..... Issued by .....

Local registrar

Address of court office .....

TO:

Ottawa Police ServiceBoard
110 Laurier Ave. West
Ottawa, Ontario
K1P 1J1

Anne Tardif
c/o Gowling WLG (Canada) LLP
Suite 2600, 160 Elgin Street
Ottawa, Ontario K1P 1C3

Gowling WLG (Canada) LLP
Suite 2600, 160 Elgin Street
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CLAIM

1. The plaintiff claims: See attached Statement of Claim (SECTION 13: RELIEF SOUGHT).

'Attached Statement of Claim sets forth the cause of civil action for remedies requested at the discretion of the Court specifying declaratory and injunctive relief with associated damages claimed.'

STATEMENT OF CLAIM

COURT FILE NO.: CV-25-[TO BE ASSIGNED]

ONTARIO SUPERIOR COURT OF JUSTICE

BETWEEN:

ALLAN DOUGLAS WILSON

Plaintiff

-and-

OTTAWA POLICE SERVICE BOARD

ANNE TARDIF

GOWLING WLG (CANADA) LLP

Defendants

STATEMENT OF CLAIM TO THE DEFENDANTS:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the  
Plaintiff. The claim made against you is set out in the following pages.

## I. THE PARTIES

- (1) The Plaintiff, Allan Douglas Wilson ("Wilson"), is an individual residing at 1321 Upland Drive, Unit 21311, Houston, Texas USA 77043. At all material times, Wilson was a self-represented litigant engaged in legitimate legal proceedings before the Ontario Superior Court of Justice.
- (2) The Defendant, Ottawa Police Service Board ("OPSB"), incorrectly named as Ottawa Police Service in the underlying proceedings, is a police services board established under the Police Services Act, R.S.O. 1990, c. P.15, responsible for the governance and oversight of the Ottawa Police Service.
- (3) The Defendant, Anne Tardif ("Tardif"), is a lawyer licensed by the Law Society of Ontario (LSO #52051A), practicing with the law firm Gowling WLG (Canada) LLP, who acted as counsel for the OPSB in Divisional Court proceedings DC-25-2976.
- (4) The Defendant, Gowling WLG (Canada) LLP ("Gowling"), is a law firm registered in Ontario with offices at Suite 2600, 160 Elgin Street, Ottawa, Ontario K1P 1C3, which employed Tardif and is vicariously liable for her actions.

## II. NATURE OF THE PROCEEDING

- (5) This action arises from deliberate false accusations made by the Defendants against Wilson in legal submissions filed with the Ontario Superior Court of Justice (Divisional Court) in proceeding DC-25-2976. The false accusations were made in writing in a court document titled "Response of the Ottawa Police Service Board to the Applicant's Rule 2.1.01 Submissions" dated November 5, 2025 ("the Defamatory Document").
- (6) The false accusations were adopted and judicially endorsed by Justice M. Labrosse in his Endorsement dated November 21, 2025, thereby giving the false

statements the imprimatur of judicial authority and creating a permanent record damaging to Wilson's reputation.

### III. BACKGROUND FACTS

#### The Underlying Proceedings

- (7) On or about December 2024, Wilson commenced an action in the Ontario Superior Court of Justice bearing Court File No. CV-24-97442, alleging violations of his Charter rights and seeking damages of \$4,369,686.50 from three defendants, including the OPSB.
- (8) On January 8, 2025, Justice A. Kaufman dismissed Wilson's Statement of Claim pursuant to Rule 2.1.01(1) of the Rules of Civil Procedure, characterizing the claims as "frivolous and vexatious."
- (9) Wilson subsequently filed an Application for Judicial Review in the Divisional Court (DC-25-2976) seeking to set aside Justice Kaufman's dismissal on grounds including error of law, lack of evidence, inadequate reasons, and judicial plagiarism.

#### The Case Management Process

- (10) Justice M. Labrosse conducted two case management conferences in September 2025 concerning Wilson's Application for Judicial Review.
- (11) Between the first and second case management conferences, the OPSB, through its counsel Tardif and Gowling, filed a request pursuant to Rule 2.1 seeking dismissal of Wilson's Application for Judicial Review.
- (12) Wilson was directed to respond to the Rule 2.1 Notice and filed detailed written submissions responding to the jurisdictional and substantive issues raised by the Defendants.

(13) On November 5, 2025, Tardif, on behalf of OPSB and Gowling, filed the Defamatory Document containing false accusations against Wilson.

#### IV. THE FALSE ACCUSATIONS CONSTITUTING DEFAMATION

##### First False Accusation: "Personal Attacks" on Judicial Character and Integrity

(14) At paragraph 14 of the Defamatory Document, the Defendants falsely accused Wilson of making "personal attacks on the character and professional integrity of a judicial officer," stating: "These personal attacks on the character and professional integrity of a judicial officer are a recognized hallmark of vexatious proceedings: *Youmouri v Downey*, 2024 ONSC 5749 (CanLII), at para 21."

(15) This statement is false, defamatory, and was made with knowledge of its falsity or with reckless disregard for the truth.

(16) Wilson's submissions in the Application for Judicial Review contained documented legal analysis of Justice Kaufman's published Endorsement, including identification of misapplication of the disjunctive legal test in Rule 2.1.01(1), analysis of inadequate reasons in violation of appellate standards established in *Barbieri v. Mastronardi*, 2014 ONCA 416, documentation of extensive textual similarities to *Gao v. Ontario WSIB*, 2014 ONSC 6497, in a 15-page Plagiarism Analysis Report, identification of substantive legal errors revealing lack of independent judicial analysis, and analysis of erroneous legal conclusions regarding court jurisdiction.

(17) Wilson's criticism was exclusively focused on the published judicial decision and its legal deficiencies. Wilson made no ad hominem attacks, no questioning of Justice Kaufman's personal character or motives, and used no improper language.

- (18) Challenging judicial decisions on grounds of inadequate reasons, error of law, or lack of independent analysis is a fundamental aspect of appellate and review processes protected by principles of access to justice and freedom of expression.
- (19) The Defendants' characterization of legitimate legal criticism as "personal attacks on the character and professional integrity of a judicial officer" was false and was intended to discredit Wilson's legitimate legal arguments, portray Wilson as a vexatious litigant, support dismissal of Wilson's Application without addressing its substantive merits, and damage Wilson's reputation and credibility before the Court.

Second False Accusation: "Targeting the Integrity of a Judicial Officer"

- (20) At paragraph 9 of the Defamatory Document, the Defendants falsely stated: "The OPS also argues that the proceeding appears to be vexatious as it has many of the hallmarks of a vexatious pleading which includes targeting the integrity of a judicial officer."
- (21) This accusation was adopted and judicially endorsed by Justice M. Labrosse at paragraph [9] of his Endorsement dated November 21, 2025, where he stated: "The OPS also argues that the proceeding appears to be vexatious as it has many of the hallmarks of a vexatious pleading which includes targeting the integrity of a judicial officer."
- (22) By including this statement without qualification, criticism, or correction, and by relying upon it as supporting justification for dismissal, Justice Labrosse lent judicial authority to the Defendants' false accusation.
- (23) The statement that Wilson was "targeting the integrity of a judicial officer" is factually false and defamatory because Wilson's submissions contained objective, documented analysis of legal errors in a published judicial decision, no

reasonable person reading Wilson's submissions could conclude they constituted "targeting" of judicial integrity, the accusation conflates substantive legal criticism with improper personal attacks, and the statement imputes improper motives and vexatious conduct to Wilson.

Third False Accusation: Inference that Wilson Suggested Justice Kaufman Had Personal Fantasies

(24) At paragraph 9 of the Defamatory Document, the Defendants quoted Wilson's submission and characterized it as follows: "At paragraph 9, the Applicant suggests that Justice Kaufman was describing a personal fantasy in the Decision: In describing the claims as 'fantastical' it is unclear in the Judge's assessment whether the worldwide surveillance capabilities described in the Statement of Claim were being questioned, or the technologies used to target the Petitioner. It is also unclear whose fantasy this kind of targeting would be a part of, and if people often fantasize about: multiple hospitalizations, insomnia, and being ostracized by one's family and community. It can be inferred that the Judge is describing his own fantasy in the Endorsement, and is one that must be experienced to be believed."

(25) The Defendants deliberately mischaracterized Wilson's analytical submission as a "personal attack" when it was, in fact, a logical analysis of the word "fantastical" as used by Justice Kaufman.

(26) Wilson's submission made the following logical and reasonable points: Justice Kaufman characterized Wilson's claims as "fantastical" without providing supporting facts or evidence, the word "fantastical" means "based on fantasy", the unsupported opinion was clearly that of the judge, therefore the logical

inference was that the fantasy described was the judge's own characterization, and no other information in the Endorsement suggested otherwise.

- (27) Wilson's analysis was a critique of judicial reasoning methodology, not a suggestion of improper personal fantasies. The Defendants' characterization was deliberately misleading and false.

Fourth False Accusation: Use of "Rhetorical Questions" as Hallmark of Vexatious Pleading

- (28) At paragraph 15 of the Defamatory Document, the Defendants falsely claimed: "Moreover, the sentence, '[i]t is also unclear whose fantasy this kind of targeting would be a part of, and if people often fantasize about: multiple hospitalizations, insomnia, and being ostracized by one's family and community', reproduced as part of the above quote, is for all intents and purposes a rhetorical question. It could just as easily have been framed as, 'Would anyone fantasize about this kind of targeting? Would anyone fantasize about: multiple hospitalizations, etc.?' Rhetorical questions are a recognized hallmark of vexatious pleadings: Gao v Ontario WSIB, 2014 ONSC 6497 (CanLII), at para 15."

- (29) This characterization is false because Wilson's statement was not phrased as a question, rhetorical or otherwise, the statement was declarative in nature stating "it is also unclear whose fantasy this kind of targeting would be a part of", the Defendants deliberately reframed Wilson's declarative statement as rhetorical questions to fit their false narrative, and the characterization was designed to falsely portray Wilson as a vexatious litigant.

- (30) The Defendants' deliberate misrepresentation of Wilson's actual words to manufacture evidence of vexatious conduct constitutes malicious falsehood.

## V. PUBLICATION AND REPUBLICATION OF THE DEFAMATORY STATEMENTS

(31) The Defamatory Document was filed with the Ontario Superior Court of Justice (Divisional Court) and served on Wilson, the Court through Justice M. Labrosse, counsel for the other defendants including Kim Dullet of Borden Ladner Gervais LLP and Joshua Toews of the Department of Justice Canada, and court administration staff.

(32) The defamatory statements have been published to multiple parties and have become part of the permanent court record.

(33) Justice M. Labrosse republished the defamatory accusations at paragraph [9] of his Endorsement dated November 21, 2025, thereby giving them judicial endorsement and significantly amplifying their harmful effect.

(34) The Endorsement containing the defamatory statements is publicly accessible through court records and legal databases, including CanLII, constituting ongoing publication.

## VI. DEFAMATORY MEANING

(35) The false accusations are defamatory in their natural and ordinary meaning and bear the following defamatory imputations: that Wilson is a vexatious litigant who files frivolous and abusive legal proceedings, that Wilson makes personal attacks on judges rather than engaging in legitimate legal advocacy, that Wilson targets the integrity of judicial officers for improper purposes, that Wilson's legal submissions are not worthy of serious consideration, that Wilson lacks the character and fitness to participate properly in legal proceedings, that Wilson's conduct exhibits recognized hallmarks of vexatious pleadings, that Wilson

engages in improper litigation tactics designed to harass or embarrass opponents, and that Wilson is untrustworthy and acts in bad faith in legal proceedings.

(36) These imputations lower Wilson's reputation in the eyes of right-thinking members of society, particularly within the legal community, the judiciary, and potential employers or associates.

(37) The defamatory statements expose Wilson to hatred, contempt, and ridicule, and cause him to be shunned and avoided in professional and legal contexts.

## VII. MALICE AND INTENTION

(38) The Defendants made the false accusations with malice and with the dominant intention to injure Wilson's reputation and legal interests.

(39) The Defendants knew or ought to have known that the statements were false because they had Wilson's actual written submissions before them, Wilson's submissions clearly constituted legal analysis rather than personal attacks, the Defendants are legally trained professionals capable of distinguishing between legal criticism and personal attacks, the Defendants deliberately mischaracterized Wilson's declarative statements as rhetorical questions, the Defendants provided no objective evidence supporting their characterizations, and the Defendants made the statements as part of a litigation strategy to avoid addressing substantive legal issues.

(40) The Defendants' malicious intent is evidenced by the deliberate misquotation and reframing of Wilson's words, the absence of any factual foundation for the accusations, the strategic timing of the accusations to influence Justice Labrosse's decision, the failure to cite any specific examples of actual personal attacks, the characterization of standard appellate advocacy as vexatious conduct, and the knowing use of false accusations to secure tactical advantage.

(41) The Defendants made the false accusations in bad faith and with reckless disregard for the truth, knowing they would damage Wilson's reputation and prejudice his legal proceeding.

#### VIII. ABSENCE OF LAWFUL JUSTIFICATION OR PRIVILEGE

##### Absolute Privilege Does Not Apply

(42) The Defendants may claim that their statements are protected by absolute privilege as statements made in the course of judicial proceedings. This claim fails for multiple independent reasons.

(43) First, absolute privilege does not logically exist in these circumstances because the defamatory statements lack any direct connection to the subject matter of the requested review. The Application for Judicial Review concerned alleged errors of law, inadequate reasons, judicial plagiarism, and jurisdictional issues in Justice Kaufman's dismissal of Wilson's underlying Statement of Claim. The proper scope of response would address whether the Divisional Court had jurisdiction to conduct judicial review, whether Justice Kaufman's reasons were adequate, whether the legal test under Rule 2.1.01(1) was properly applied, and whether the alleged errors of law warranted setting aside the dismissal.

(44) The Defendants' false accusations that Wilson made "personal attacks" on Justice Kaufman's character and was "targeting the integrity of a judicial officer" bear no logical connection to these issues. Whether Wilson's claims against the OPSB have merit, whether the Divisional Court has jurisdiction, whether Justice Kaufman's reasons contain errors of law, and whether judicial plagiarism occurred are objective legal questions that exist independently of any characterization of Wilson's motivations or character.

- (45) The defamatory statements were gratuitous character attacks inserted into legal submissions for the collateral purpose of discrediting Wilson rather than addressing the substantive legal issues before the Court. Statements that lack relevance to the issues in controversy and serve only to injure reputation exceed the boundaries of absolute privilege because they are not genuinely part of the judicial proceeding but rather constitute abuse of the privilege.
- (46) The principle that absolute privilege protects statements relevant and pertinent to the matter at issue means that statements wholly unconnected to the actual legal questions before the Court fall outside the scope of protection. The Defendants cannot manufacture relevance by falsely claiming Wilson's analytical legal criticism constitutes improper "targeting" of judicial integrity, particularly when that characterization itself is the defamatory statement at issue.
- (47) Second, absolute privilege does not extend to statements that may constitute criminal conduct. The Defendants' false accusations, made in formal court submissions with knowledge of their falsity and with intent to influence judicial decision-making, potentially constitute the criminal offence of attempting to obstruct, pervert or defeat the course of justice contrary to section 139(2) of the Criminal Code, R.S.C. 1985, c. C-46. A privilege designed to facilitate the administration of justice cannot logically protect conduct that undermines and perverts that very system.
- (48) The purpose of absolute privilege is to ensure fearless advocacy and candid participation in judicial proceedings. It does not exist to shield deliberately false statements made to mislead courts and secure tactical advantage through character assassination. To extend absolute privilege to potentially criminal

conduct would subvert the privilege's fundamental purpose and transform it into a license for corruption of the judicial process.

- (49) Third, the statements were far outside the scope of duties for a government lawyer representing a police services board. Tardif's professional duties as counsel for the OPSB in the Application for Judicial Review included addressing the jurisdictional arguments, responding to allegations of legal error in Justice Kaufman's decision, presenting legal authorities relevant to the proper scope of judicial review, and defending the OPSB's interests in a manner consistent with professional obligations.
- (50) Those duties did not include, and could never properly include, making false accusations about an opposing party's character and motives, deliberately misrepresenting the nature of opposing counsel's submissions, manufacturing false evidence of vexatious conduct, engaging in ad hominem attacks to avoid substantive legal argument, or using the court process to damage a self-represented litigant's reputation.
- (51) A government lawyer has heightened professional obligations given that she acts on behalf of the state and in the public interest. These obligations include a duty of candor to tribunals, a duty not to knowingly mislead courts, a duty to uphold the integrity of the administration of justice, and a duty to treat self-represented litigants with fairness and respect. The Defendants' conduct violated all of these obligations and cannot be characterized as falling within the scope of proper government legal representation.
- (52) The Defendants' false accusations were not incidental excesses in the course of otherwise proper advocacy but rather constituted the central thrust of their response strategy. They chose to attack Wilson's character and credibility rather

than address the substantive legal merits of his Application for Judicial Review.

This deliberate strategic choice to substitute character assassination for legal argument falls entirely outside any legitimate scope of government legal representation.

- (53) Government lawyers do not have authority to weaponize the court process against citizens by making deliberately false statements to damage their reputations. Such conduct exceeds any privilege because it constitutes fundamental abuse of the lawyer's role and betrayal of the public trust inherent in government legal representation.

#### Qualified Privilege Does Not Apply

- (54) Even if the statements were protected by qualified privilege rather than absolute privilege, such privilege is defeated by malice.

- (55) The Defendants acted with malice in making the false accusations, as particularized above, thereby defeating any claim to qualified privilege.

- (56) In the alternative, the Defendants' conduct exceeded the bounds of any privilege because the false accusations were not reasonably relevant to the issues before the Court, the statements went beyond fair comment on Wilson's legal arguments, the Defendants deliberately misrepresented Wilson's words and intentions, the accusations were made for an improper collateral purpose of avoiding substantive legal argument, and the statements constituted abuse of the court process.

#### Fair Comment Does Not Apply

- (57) The defence of fair comment does not apply because the statements are assertions of fact rather than expressions of opinion, the statements are not based on true

facts, the Defendants did not honestly believe the statements to be true, and the statements were made with malice.

#### Justification Does Not Apply

(58) The defence of justification does not apply because the statements are demonstrably false and the Defendants cannot prove their truth.

### IX. DAMAGES SUFFERED BY WILSON

#### General Damages for Injury to Reputation

(59) As a direct and proximate result of the Defendants' defamatory statements, Wilson has suffered serious injury to his reputation, including damage to his standing within the legal community, judicial endorsement of false accusations creating a permanent record that may be cited against him in future proceedings, characterization as a vexatious litigant which carries serious legal consequences including potential restrictions on future litigation, impairment of his ability to be heard fairly in current and future legal proceedings, damage to his professional reputation and credibility, and exposure to contempt, ridicule, and avoidance by legal professionals and the public.

(60) The judicial endorsement of the false accusations significantly amplified the damage because judicial statements carry enhanced credibility and authority, the Endorsement is published in legal databases and accessible to the public, the false characterizations now appear in a formal court decision, and future courts, lawyers, and litigants may rely on these characterizations.

#### Special Damages

(61) Wilson has incurred and will continue to incur special damages, including the need to respond to and attempt to correct the false accusations in ongoing and

future proceedings, increased difficulty and expense in pursuing legitimate legal remedies, potential loss of employment or business opportunities due to damaged reputation, costs associated with this defamation action, and time and resources expended addressing the consequences of the false accusations.

#### Aggravated Damages

(62) Wilson claims aggravated damages due to the particularly harmful nature of the defamation, including the deliberate and malicious nature of the false accusations, the Defendants' position as legal professionals with heightened duties of honesty and integrity, the judicial endorsement amplifying the harm, the permanent nature of the published record, the targeting of a self-represented litigant by well-resourced institutional defendants, the use of false accusations to avoid substantive legal argument, the serious implications of being labeled vexatious including potential restriction orders, and the mental distress, anxiety, and humiliation caused by the false accusations.

#### Punitive Damages

(63) Wilson claims punitive damages because the Defendants' conduct was high-handed, malicious, and oppressive, the false accusations represent deliberate abuse of the court process, the Defendants as legal professionals breached fundamental duties of candor to the tribunal, the conduct deserves denunciation and deterrence to prevent similar abuse by other litigants, the Defendants leveraged their institutional resources and legal sophistication against a self-represented litigant, the conduct undermines public confidence in the administration of justice, and an award of punitive damages is necessary to vindicate Wilson's rights and deter future misconduct.

## X. CRIMINAL CONDUCT: ATTEMPTING TO PERVERT THE COURSE OF JUSTICE

- (64) The Defendants' conduct may constitute the criminal offence of attempting to pervert the course of justice, contrary to section 139(2) of the Criminal Code, R.S.C. 1985, c. C-46.
- (65) Section 139(2) provides: "Every one who wilfully attempts in any manner other than a manner described in subsection (1) to obstruct, pervert or defeat the course of justice is guilty of an indictable offence and liable to imprisonment for a term not exceeding ten years."
- (66) The Defendants' false accusations were made in formal court submissions and were intended to and did interfere with the administration of justice by causing Justice Labrosse to dismiss Wilson's Application on false grounds, preventing substantive consideration of serious constitutional allegations, prejudicing Wilson's right to fair adjudication, creating a false judicial record that would affect current and future proceedings, misleading the Court regarding the nature of Wilson's submissions, and using false characterizations to secure tactical advantage in ongoing litigation.
- (67) The Defendants acted wilfully in making the false accusations, knowing they were untrue or being reckless as to their truth, and knowing they would influence the Court's decision.
- (68) The making of deliberately false statements to a court for the purpose of influencing judicial decision-making constitutes an attempt to pervert the course of justice.
- (69) Wilson pleads these facts as evidence of the Defendants' malicious intent and the gravity of their misconduct, warranting exemplary and punitive damages. The fact that the Defendants' conduct may constitute criminal offence further

demonstrates why no privilege can apply to shield such conduct from civil liability.

## XI. BREACH OF PROFESSIONAL DUTIES

### Law Society of Ontario Rules of Professional Conduct

(70) The Defendant Tardif, as a lawyer licensed by the Law Society of Ontario, owed professional duties including a duty of candor to the tribunal under Rule 5.1-1 of the Rules of Professional Conduct, a duty to act in good faith to the tribunal and with all persons with whom the lawyer has dealings under Rule 5.1-5, a duty to not knowingly assist in or encourage any dishonesty, fraud, crime, or illegal conduct under Rule 3.7-7(a), and a duty to encourage public respect for the administration of justice under Rule 5.6-1.

(71) Tardif breached these professional duties by making false accusations she knew or ought to have known were untrue, deliberately mischaracterizing Wilson's submissions to mislead the Court, making inflammatory accusations designed to prejudice the Court against Wilson, taking advantage of Wilson's self-represented status, and abusing the court process for tactical litigation advantage.

(72) Gowling is vicariously liable for Tardif's breaches of professional duty as her employer and the law firm responsible for the conduct of the litigation.

### Breach of Duty of Care

(73) The Defendants owed Wilson a duty of care not to make false statements about him that would foreseeably cause harm to his reputation and legal interests.

(74) The Defendants breached this duty by making the false accusations as particularized above.

(75) Wilson has suffered damages as a direct and proximate result of the Defendants' breach of duty.

## XII. CONSPIRACY TO INJURE

(76) In the alternative, the Defendants engaged in a civil conspiracy with the predominant purpose of injuring Wilson by agreeing to advance false accusations against Wilson, coordinating their litigation strategy to avoid addressing substantive constitutional claims, making false statements they knew would damage Wilson's reputation, using their institutional resources and legal sophistication to overwhelm a self-represented litigant, and acting in concert to secure dismissal of Wilson's legitimate legal claims without substantive adjudication.

(77) The Defendants acted with the predominant intention to injure Wilson's reputation and legal interests rather than to advance legitimate forensic purposes.

(78) Wilson has suffered damages as a direct and proximate result of the Defendants' conspiracy.

## XIII. RELIEF SOUGHT

### THE PLAINTIFF CLAIMS:

(79) General damages for defamation in the amount of \$500,000.

(80) Special damages in an amount to be determined at trial.

(81) Aggravated damages in the amount of \$250,000.

(82) Punitive damages in the amount of \$500,000.

(83) A declaration that the Defendants' accusations that Wilson made "personal attacks on the character and professional integrity of a judicial officer" are false, the Defendants' accusation that Wilson was "targeting the integrity of a judicial

officer" is false, Wilson's submissions constituted legitimate legal criticism protected as part of appellate and review processes, and the Defendants' conduct breached their professional duties and constituted abuse of court process.

(84) An injunction restraining the Defendants from making further false accusations against Wilson in any legal proceeding, misrepresenting Wilson's words or intentions in any legal submission, or characterizing legitimate legal criticism as vexatious conduct.

(85) An order requiring the Defendants to publish a retraction and apology in a form approved by the Court, serve copies of the retraction on all parties who received the Defamatory Document, and file the retraction with the Divisional Court in proceeding DC-25-2976.

(86) Pre-judgment and post-judgment interest in accordance with the Courts of Justice Act.

(87) Costs of this action on a substantial indemnity basis.

(88) Such further and other relief as this Honourable Court may deem just.

NOTICE TO DEFENDANTS,

YOU ARE ADVISED THAT:

This Statement of Claim alleges that you made false accusations against the Plaintiff in court documents, constituting defamation, abuse of process, and potentially criminal conduct. The allegations include that you falsely accused the Plaintiff of making personal attacks on a judicial officer, falsely accused the Plaintiff of targeting judicial integrity, deliberately mischaracterized the Plaintiff's legal submissions, made these false statements with malice and for improper purposes, breached professional

duties owed to the Court and to the Plaintiff, and caused serious harm to the Plaintiff's reputation and legal interests.

The Plaintiff seeks substantial damages including punitive damages, declarations of falsity, injunctive relief, and costs on a substantial indemnity basis.

The Plaintiff further alleges that no privilege applies to your statements because they lacked any direct connection to the subject matter of the judicial review, potentially constitute criminal conduct which cannot be privileged, and fell far outside the scope of duties for government lawyers representing public institutions.

ISSUED BY:

DATE: December 8 , 2025



Allan Douglas Wilson

Plaintiff (Self-Represented)

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Allan Douglas Wilson v. Gowling WLG LLP et al.

FORM 4C  
*Courts of Justice Act*  
BACKSHEET

ONTARIO SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT OTTAWA COURTHOUSE

STATEMENT OF CLAIM

*Allan Douglas Wilson (self-represented), 1321 Upland Drive, Houston, Texas, 77043 USA;*

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*Filed December 8, 2025*

RCP-E 4C (November 1, 2005)