

To: Stephen the Lawless Liar Lichti for Crown
Stephen.lichti@ontario.ca

MOTION TO DISMISS and NOTICE OF COUNTERCLAIM

(In reply to Stephen Lichti's Form 2)

APPENDIX A – CROWN REPLY

CONCISE STATEMENT OF THE REASONS FOR RESPONDING 1. The

applicant has alleged violations of his rights under section 11(d) of the
Canadian Charter of Rights and Freedoms.

True, but also misleading and fraud by Way of omission - or maybe this is more
commonly known as professional gaslighting in the legal profession?

What Charter rights was Stephen Lichti for Crown accused of violating in the
Form 1 Application? 11(a) to be informed without reasonable delay, 11(b) to
trial in reasonable time, ***11(d)presumption of innocence till proved guilty in a
fair and public hearing***, 11(g) to not be charged with a crime for an Act that
was not a crime at the time it occurred, 7. life, liberty and security of the
person (unlawful arrest and detention), 12 to not be subject to ***cruel and
inhumane punishment*** , 11(d) to ensure that ***only those found guilty are
condemned by the Justice system***, 8 ***unlawful search and seizure, unlawful***

confinement (torture, solitary confinement). The accused has been convicted of no crime but has been *egregiously harmed by the willful violation of numerous Charter rights by the malicious prosecution.*

2. The Crown requests a summary dismissal of this *Charter* application because it is manifestly frivolous. This application clearly has no basis upon which it could succeed.

Only a malicious, clearly partisan prosecutor would violate a Man's rights with such impunity and be asking of the Courts to dismiss as 'manifestly frivolous'? When was the last time Stephen Lichti spent twenty-four hours in solitary confinement with some One recording his every toilet requirement? Maybe he should be held in an Ottawa Police holding cell for twenty-four hours without ever having been convicted of any crime before he chooses to characterize complaining about it as 'manifestly frivolous'?! The nerve of this prosecutor!

3. In the alternative, the Crown submits there are no violations of the *Charter* and this application should be dismissed.

I'm seriously wondering if having a law degree gives One permission to wilfully engage in fraud and perjury? Stephen Lichti (or any One else with more than two working brain cells) knows damn well he has violated the rights of the accused which is why he omit the majority from his reply, hoping the Motion judge Will forget what the motion was about.

11a. - The information itself proves that Charter right 11a. was violated (right to be informed without reasonable delay) because the information shows the charges were

filed with the Court on June 17th, 2024 but the accused was not Given Notice until **March of 2025!** That is clearly beyond the realm and scope of any ‘reasonable’ delay.

11(b) - Right to trial in reasonable time has also been violated on its face without the consent of the accused and in violation of his rights, that is also expressed directly on the charging information, stating ***the latest the Court can hear this Matter is December 17th, 2025.*** Stephen Lichti is not acting impartially and does not care about the rights of the accused whatsoever, so this is of no concern to Stephen Lichti, which is also a violation of his duties to the Court according to the Rules of Criminal Procedure 1.1(2)(b) which states their FUNDAMENTAL OBJECTIVE, is “recognizing the rights of the accused”.

11.(d) - the right to the presumption of innocence till proved guilty. Stephen Lichti has violated that right with impunity as evidenced in the below ‘DETAILED STATEMENT OF **FACTUAL BASIS** FOR OPPOSING APPLICATION’ where he does nothing more than repeat the *accusations and allegations* in the information which have not been established as fact by any Court whatsoever! Once again, it is ***fraud*** to suggest an accusation or opinion is ‘FACT’ on a Court of Record if it has not been clearly established as such by a competent court of law - that is the very definition of breaching the right to presumption of innocence!

Stephen Lichti is making hearsay allegations he *has no first hand knowledge of and presenting it to the Court as the ‘factual basis’ for dismissing the Application for rights violations?!* The accusers are not *victims* until their accusations are established to be factual. The officer on the scene advised *Mara Watson that nothing she reported to the police constitutes a criminal act.*

The initial, reporting officer information also indicates that ***no harm was done to any person or property***. If there is no injured party or property, *there is no crime in any common law jurisdiction*. No One was threatened with harm, so no One would have any *reasonable* cause to fear for their safety. Offending some One is not a criminal Act. If Stephen Lichti were unbiased and bringing these charges because he felt it was necessary *to protect the safety of the accusers, he would have acted on the warrant the moment it was issued* on June 17th of 2024, ***not eight months later in March of '25!!!***

11(g) to not be charged with a crime for an Act that *was not a crime at the time it occurred*. Again, the reporting officer indicated that none of the Actions of the accused constitute a criminal Act. Now, they are attempting to charge the accused for the same Act despite the police officer acknowledging in her report that the actions of the accused do NOT constitute a criminal act. They literally built a case against the accused to turn an act that was not a criminal act at the time it was reported into a criminal Act by asking the community volunteers of MHI to conspire against the accused together to build a case for criminal harassment instead. Yvonne Ashby is complaining of criminal harassment for being served with a Notice of Civil and Criminal Liability for failing to produce receipts upon request necessary for litigation in violation of the Residential Tenancies Act and constituting obstruction of Justice as the accused was as King of the information as evidence required for a Matter before the LTB where the landlord was found to have stolen at least \$1018.00 by receiving additional funds from the city intended to pay the accused's utility expenses. Placing an individual on Notice of Liability is the first due process of Law. Yvonne Ashby was never harassed by any One as she is only acting a manager for the corporation and

accepts liability on behalf of the corporation as the property manager. The accused has never met Yvonne Ashby or emailed her. The accused has only emailed the official address for MHI management which Yvonne Ashby was responsible for responding to at the time. A building manager stealing from tenants and refusing to provide receipts to tenants upon demand is a slumlord and should be placed on Notice of Liability for their criminal negligence (presuming she wasn't gaslighting the inquiry with intent to antagonize).

7. life, liberty and security of the person - this right was violated by Stephen Lichti when he was asking to have the accused arrested for 'failing to appear' despite the fact that Stephen Lichti knows that the accused was never served with any Notice of hearing and had no opportunity to Honour any request to appear before the Court because Stephen the Lawless Liar Lichti and the Ontario Provincial Court were ghosting the accused's email requisitions for disclosure! He was arrested and spent twenty-four hours unlawfully incarcerated without ever being found guilty of a crime because a Man cannot be faulted for failing to show up for a party he is not invited to attend! Every single 'summons' that was issued by the Court indicates that it 'was not served' upon the accused. There is even an allegation that the accused REFUSED service multiple times!!! The entire time they are allegedly trying to serve the accused, the accused is frantically writing the Court asking for disclosure and the next court date - no One EVER responded.

The FACTUAL basis to prove the accused rights were violated is the FACT that the accused has already spent twenty-four hours subject to cruel and inhumane punishment without having been convicted of any crime, which is egregiously greater harm than anything claiming to have been done to the alleged victims by the accused.

12. Not to be subject to cruel and inhumane punishment. Solitary confinement is considered cruel and inhumane treatment, videotaping One's toilet habits is demoralizing and a violation of the accused's privacy rights as well.

11(d) to ensure that ***only those found guilty are condemned by the Justice system -*** Clearly, being subject to cruel and inhumane punishment without ever being found guilty of a crime in any court proceeding is a gross violation of One's right to the presumption of innocence and to not be subject unlawfully to cruel and inhumane punishment. The harm done to the accused is substantially greater than what prosecutor Stephen Licthi is alleging the accused has done to his victims.

Finally, nothing in the information constitutes criminal harassment even if everything were True on its face! In order for criminal harassment charges to be valid, the accused must know the communication is unwanted, must REPEAT THE BEHAVIOUR *and* (not or, all three elements must be proved) cause a *reasonable* person to fear for their safety. No *reasonable* person would fear for their safety based on the information. Being offended is not a cause to fear for One's safety. This again further proves that Stephen the Lawless Liar Lichti is proceeding with malicious intent, determined to get a conviction regardless how frivolous and vexatious the allegations are. The Crown information contains ***threats made against the accused*** by his accusers!!! No mention of Laura Schink aggravating the accused with threats of physical violence against Sean - that's perfectly acceptable and constitutes and 'unbiased' police investigation? Were ANY impartial witnesses interviewed or questioned? No. Because if any impartial witnesses were to Give Honest testimony, they would advise Stephen Lichti that the accusers are known as community bullies in the neighbourhood. Unfortunately, very few People are Willing to speak up to stand

against the community bullies because Sahada the Satanic Alolo is also on the police equity council and weaponizes the Ottawa Police against any One who complains that MHI is exploiting the rights of tenants or negligent in their maintenance duties. The police have Monelle Quevillon on hand Acting as Justice of the pigs to endorse any fraudulent police information as a favour to her long term fellow colleagues (she worked as a detective for the Ottawa Police before being given totalitarian power to endorse whatever corrupt, one sided police information she wishes).

DETAILED STATEMENT OF FACTUAL BASIS FOR OPPOSING APPLICATION

This entire section of Stephen Lichti's 'Appendix A' is fraud! Not figuratively or hyperbolically, but intentional, Willful fraud suggesting all the allegations are the FACTUAL BASIS for opposing the application.

4. The Applicant is charged with three counts of criminal harassment contrary to s. 264(2) of the *Criminal Code*.

True - but PRESUMED INNOCENT till proved guilty in a fair and public hearing before a Court of *competent* jurisdiction. This Matter has not yet been before a Court or Justice of *competent* jurisdiction.

5. Between February and May of 2024, the accused repeatedly sent harassing emails to Yvonne Ashby, the property manager of the Multifaith Housing Initiative. Yvonne Ashby no longer felt safe at her workplace because of the Applicant's harassing emails. The lawyer for the property management team instructed the accused to only communicate through them, which the Applicant ignored.

This is absolute fraud. Stephen is adding his own speculation and (incorrectly) suggesting that the landlord's lawyer would have any right to tell the accused who he can or can't communicate with. If the lawyer were providing the information instead, that might be acceptable but that is not the case. The lawyer in question is the one defending for the landlord in an LTB claim and probably advising Yvonne Ashby not to provide the accused with receipts because that would allow him to prove the theft and fraud of public money before the LTB. The accused harassed no One, he placed Yvonne Ashby on Notice for obstruction of Justice and breach of Trust for failing to produce receipts on demand in compliance with the RTA and her own emails to the accused, promising to produce them by a specific date and time, then failing to do so.

6. On May 13, 2024, the Applicant is accused of saying threatening statements in front of a group of residents in the communal garden of the Multifaith Housing Initiative residence.

Yes, ACCUSED. Not a fact. Suggesting these are relevant 'facts' is fraud by definition. Another violation of

7. On May 13, 2024, the accused attended the community garden. The Applicant called several individuals names. The accused approached Manon Bastien, an elderly disabled woman, and called her a "fat, toothless bitch." The next day, the accused called Manon and her partner, Laura Schink, "Garden Nazi's." Hearsay. Nothing but hearsay. Stephen the Lawless LIAR Lichti has no idea if this is true or not because he wasn't there. Hearsay is not fact and not admissible on a Court of Record. One cannot present hearsay testimony as 'fact' without engaging in FRAUD! Stephen IN FACT has the burden of proof and MUST Honour the accused'

presumption of innocence. Another example of routinely characterizing the behaviour of the accused as criminal based on hearsay allegations that have not been substantiated by any facts whatsoever.

8. On May 13, 2024, the accused also approached Leila Sieg while she was attending to her garden plot and yelled at her using foul language and calling her a “Nazi.” Leila Sieg is of German descent and this term greatly offends her, and the behaviour causes her fear to her safety. The accused has yelled at Leila Sieg on other occasions because she was assigned a garden plot and he was not, although the accused never applied for a garden plot.

Again, this is fraud. These events all took place on the same day and at the same time, none of which Stephen the Lawless Liar Lichti was there to witness first hand, hearsay!!! If someone ‘fears for their safety’ because some One called them a Nazi, I would suggest they are a snowflake and should grow up. It certainly wouldn’t Give any reasonable person cause to fear for their safety, it only speaks to how malicious and ‘unreasonable’ the testimony of the narcissistic accusers must be.

ARGUMENT IN SUPPORT OF SUMMARY DISMISSAL

9. The Crown submits this application is manifestly frivolous and that it should be summarily dismissed. The correct approach when a judge is faced with a motion to summarily dismiss the applicant’s underlying application is to (1) address the summary dismissal motion; and, if refused (2) decide the underlying application on its merits.

R v Haevischer, 2023 SCC 11, at para 100

I’m not convinced ‘the Crown’ has any knowledge of this Application or the criminal charges because they were filed under a fake name ‘VON-DEHN’ and incorrect birthday (May 6, 1973). Let’s be precise here. STEPHEN LICHTI submits this application is manifestly frivolous because he does not Wish to be compelled to explain the fake

birthday or spelling on the Registry, why none of the summons to appear were ever served upon the accused, why he did not serve the accused ‘without delay’ and wait eight months to issue the warrant, why he’s not Honouring the accused’s right to a trial in reasonable time, continuously gaslighting emails to the Court by the accused asking for the next hearing date while conspiring with local police ***to have him arrested while ghosting his emails and pleading ‘ignorance’ of it all here?*** Then send Your documents through the official email channel, virtualcrownottawa@ontario.ca, not virtual.crownottawa@ontario.ca. So far, I have not received any communications from any OFFICIAL Court email address - only addresses I was advised (by the legitimate Court email ‘virtualcrownottawa@ontario.ca) to ***ignore for fraud.***

Stephen is such an idiot he keeps implicating him Self anyway. No shame or no brains.

10. The threshold to apply when determining if a *Charter* application should be summarily dismissed is “manifestly frivolous.” The “frivolous” part of the threshold means that the application will necessarily fail, is not arguable, and has no basis upon which it could succeed. The “manifestly” language is defined as “evidently, unmistakably, openly” or “clearly revealed to the eye, mind, or judgement.” The threshold connotes the obvious necessity of failure. *Haevischer*, supra, paras 68-71

There are clearly egregious Charter breaches that Stephen the Lawless Liar Lichti is hoping to gaslight, the least of which is not the change in filing number (I was told to request disclosure for 24-122310 and could not find any information under that number, all agents of the Court tell Me there is nothing in the system, now it has CHANGED!!! Not suspicious at all. The police information reads 24-122310 and shows ‘VON DEHN’, the Registry (Court Case lookup) shows VON-DEHN (Registry/identity fraud) and a Court file number of 0411998241140414200. That’s substantially different from the Court file number (not likely to be without intent) on the initial summons and requisition for disclosure, why did the name and file number change? And why does the birthday not match the birthday of the accused, even according to the police information? The identification by fingerprinting showed the individual whose

fingerprints You took has a birthday of **June 5th, 1973** and *the name does not match the name of the accused!!!*

I don't know what right You are violating specifically for proceeding against a fraudulent name, but I believe I have the right to ensure that all legal matters concerning My interests are addressed to Me in My proper legal and lawful name (and nothing else) and Will be as King of any competent judicial authority what right that Will fall under.

11. This threshold is rigorous and will allow judges to weed out those applications that would never succeed and which would only waste court time. It is an exercise of a judge's case management powers that serves the values of trial efficiency and trial fairness.

Proceeding against a Spiritual Man and retaliating against him for his advocacy work against a not for profit slumlord exploiting the rights of marginalized minorities dependent upon them for housing is the definition of a frivolous and vexatious prosecution. The best You can do is allege is *potential FUTURE harm*, the accused has not committed any Act that remotely constitutes a criminal offence.

Haevischer, supra, paras 68-72

12. On a summary dismissal motion, the judge must accept the facts alleged and inferences made in the application as true. The judge must also take the Applicant's arguments at their highest. The Applicant's underlying application should explain its factual foundation and point towards anticipated evidence that establish the facts alleged.

You have failed to prove anything, You have only restated previous OPINIONS and

ACCUSATIONS which You are now asking the Court to accept as FACT while simultaneously claiming You are not acting maliciously and with INTENT to violate the accused presumption of innocence? The sheer audacity is astounding!

Haevischer, supra, paras 83-84

13. This Applicant should be summarily dismissed because it is manifestly frivolous. Although the Applicant cites s. 11(d) and claims the presumption of innocence has been infringed, the Applicant has alleged no facts in support of this allegation. This matter is set for trial on March 10-12, 2026, at which point the Crown will present their case. This is an application where it is obvious to fail and hearing it would waste scarce court resources. The Crown respectfully submits this application must be summarily dismissed.

Once again, it is not an ‘allegation’ that the accused spent twenty-four hours in jail while prosecution lied to the court and suggested the accused was a flight risk and potential risk to the public safety, that is a FACT!!! All the while, Stephen the Lawless Liar Lichti was ignoring email requests for disclosure to know what was going on with this case and why the accused can’t find it in the Court case look up tool. Stephen the Lawless Liar Lichti GHOSTS the accused repeated requests for the next hearing date and or disclosure while simultaneously *lying to the Court* by suggesting the accused has a criminal record (thirty three years from the last conviction) and is trying to evade the judicial process? That is criminal contempt with INTENT. He deserves to go to JAIL along with Vinicious Oliveira who probably taught Stephen the Lawless Liar Lichti how to proceed against a Man in fraud and off the Record...

RESPONSE TO THE APPLICANT'S GROUNDS TO BE ARGUED IN SUPPORT OF
THE APPLICATION

14. In the alternative, if this court declines to summarily dismiss this application, the Crown submits there has been no breach of the Applicant's s. 11(d) rights.

The Applicant strongly disagrees as indicated by the arguments in reply to the nonsense and fraud contained in this Appendix.

15. The Applicant alleges a breach of the presumption of innocence. It is the Applicant's onus to prove on a balance of probabilities that their *Charter* right has been infringed. The Crown submits the Applicant has not discharged their burden in establishing a breach of s. 11(d) of the *Charter* and this application should be dismissed.

By referring to the accusers as 'victims' one is implying One has been already been found guilty and is attempting to frame the accused as dangerous when in reality, the accusers are narcissistic sociopaths and community bullies who collectively ambushed the accused at a community garden meet, deliberately antagonizing the accused hoping he would lash out in some Way the landlord could frame as criminal.

Referring to witnesses as 'victims' before the facts have been established is premature and unfair, especially when the police reported ***no injuries to persons or property***. They are not *victims*, they are narcissistic sociopaths who believe they are entitled to more than every One else in the community and Will retaliate against any One who complains about their sense of 'entitlement'.

16. The presumption of innocence is a constitutionally protected right under s. 11(d)

of the *Charter*. Section 11(d) states:

11. Any person charged with an offence has the right ...
(d) to be presumed innocent until proven guilty according to law in a fair and public hearing by an independent and impartial tribunal.

This is True and the accused has not been found guilty in any Court of Law, so there are no ‘victims’ or facts, only allegations and accusers.

17. At a minimum, the presumption of innocence requires the following content.

First, a finding of guilt must be proven beyond a reasonable doubt. Second, *the Crown bears the burden of proof*. Third, criminal prosecutions must be carried out in accordance with lawful and fair procedures.

I am very curious to know what reliable ‘proof’ or ‘evidence’ Stephen Lichti has that proves the accusers had cause to ‘fear for their safety’. Why? What specifically were they afraid of? This is passive aggressive narcissism. No threats were made, they were *offended*. The accused has a Charter right to freedom of expression, reason and conscience, which includes the right to criticize and by so doing, offend. If One Acts like a Nazi, I reserve the right to call them a Nazi.

R v Oakes, [\[1986\] 1 SCR 103](#), at para 35

18. At this stage, the Applicant is accused of criminal charges set to be tried on March 10-12, 2026. At the trial the Crown will present evidence to discharge its burden of proof in accordance with s. 11(d). The Applicant has provided no particulars about how their presumption of innocence has been infringed.

Of course, because We have no regard for the rights of the accused, We are not

concerned that the trial date violates the accused's right to a trial in reasonable time, Stephen Lichti has successfully violated so many other rights of the accused, what is one more?

It is clear and obvious several of the accused rights have been violated and Stephen the Lawless Liar Lichti should also be charged with criminal contempt of Court.

A fucking cunt is what he is.

19. The Crown asks that this application be dismissed.

And the Applicant is as King for Stephen the Lawless Liar Lichti to be arrested and charged to the fullest extend of the Law for violating the rights of the accused with contempt and impunity.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Date February 6th, 2026

King Sean, House von Dehn,

Hand of Stephen,

The Kingdom of Heaven Found a Sean

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