

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

INGRID WINDSOR JOSEPH (On behalf of her dependent child with special needs)
Applicant

- and -

ERIN FINCH, LINDSAY MYATT, KAITLIN HART, and JULIET SMITH
Respondents

NOTICE OF MOTION FOR MANDAMUS, CITATION FOR CONTEMPT,
AND URGENT FINANCIAL RESTITUTION

THE APPLICANT, Ingrid Windsor Joseph, will make a Motion before a Judge presiding over the Ontario Superior Court of Justice at 161 Elgin Street, Ottawa, Ontario, on a date to be fixed by the Court, or as soon thereafter as the matter may be heard.

THE MOTION IS FOR:

1. AN ORDER in the nature of Mandamus compelling the Respondents, Erin Finch and Lindsay Myatt (City of Ottawa / Ontario Works), and Kaitlin Hart and Juliet Smith (ODSP), to immediately cease all unlawful benefit clawbacks, restore full subsistence and shelter allowances, and produce an unredacted, certified forensic line-item financial ledger.
2. AN ORDER finding the named Respondents in bad-faith administrative default and breach of procedural fairness following their failure to comply with the Emergency Orders served on July 14, 2026, and July 17, 2026.
3. AN ORDER granting immediate capital allocation for emergency housing placement and permanent homeownership support to remedy state-induced displacement and active violations under Sections 7 and 15 of the Canadian Charter of Rights and Freedoms.
4. SUCH FURTHER AND OTHER RELIEF as this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE:

1. The Respondents have engaged in systemic administrative bad faith, withholding vital disclosures and manufacturing arbitrary financial restrictions while an active Social Benefits Tribunal appeal (SBT File No. 2512-09500) was in progress.
2. The Respondents' actions violate the duty of procedural fairness and natural

justice (Cardinal v. Director of Kent Institution, [1985] 2 S.C.R. 643).

3. The targeted economic deprivation and forced displacement of a family with an autistic dependent into substandard emergency shelter conditions constitute misfeasance in public office (Odhavji Estate v. Woodhouse, 2003 SCC 69) and infringe upon fundamental Charter protections (New Brunswick (Minister of Health and Community Services) v. G. (J.), [1999] 3 S.C.R. 46).
4. Contemporaneous recorded evidence (dated June 25, 2026) and medical directives confirm that the administrative actions were executed with full knowledge of catastrophic health and safety hazards.
5. Such further grounds as counsel or the Trustee may advise and the evidence permits.

THE EVIDENCE RELIED UPON IS AS FOLLOWS:

1. The Emergency Order to Compel Administrative Remedy and Financial Restitution dated July 14, 2026, and subsequent Default Notices.
2. Medical Directives from Dr. Ambika Dewan dated June 1, 2026, and June 15, 2026.
3. Ministry of the Attorney General Sheriff's Office Enforcement Notice dated May 28, 2026 (File No. DC-25-3119 / LTB-L-049847-25).
4. The Social Benefits Tribunal Notice of Postponement dated July 3, 2026 (SBT File No. 2512-09500).
5. The forensic audio recording and transcript of the June 25, 2026 administrative call.
6. Such further and other material as the Trustee may submit.

DATED at Ottawa, Ontario, this 22nd day of July, 2026.

King Sean, House von Dehn
Court-Appointed Trustee / Hand of Stephen
For the Beneficiary, Ingrid Windsor Joseph
Email: gnosticwisdom37@gmail.com