

FORM 68A

Courts of Justice Act

NOTICE OF APPLICATION TO DIVISIONAL COURT FOR JUDICIAL REVIEW

The Kingdom of Heaven Found a Sean

And

The Superior Courts of Guelph, Wellington County and Ottawa

NOTICE OF APPLICATION TO DIVISIONAL COURT FOR JUDICIAL REVIEW

TO THE RESPONDENT: A LEGAL PROCEEDING HAS BEEN COMMENCED by the applicant. The claim made by the applicant appears on the following page.

THIS APPLICATION for judicial review will come on for a hearing before the Divisional Court on a date to be fixed by the registrar at the place of hearing requested by the applicant. The applicant requests that this application be heard by Zoom as soon as it can be scheduled.

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 an Ontario lawyer acting for you must forthwith prepare a notice of appearance in Form 38A prescribed by the Rules of Civil Procedure, serve it on the applicant's lawyer or, where the applicant does not have a lawyer, serve it on the applicant, and file it, with proof of service, in the office of the Divisional Court, and you or your lawyer must appear at the hearing.

IF YOU WISH TO PRESENT AFFIDAVIT OR OTHER DOCUMENTARY EVIDENCE TO THE COURT OR TO EXAMINE OR CROSS EXAMINE WITNESSES ON THE APPLICATION, you or your lawyer must, in addition to serving your notice of appearance, serve a copy of the evidence on the applicant's lawyer or, where the applicant does not have a lawyer, serve it on the applicant, and file it, with proof of service, in the office of the Divisional Court within thirty days after service on you of the applicant's application record, or at least four days before the hearing, whichever is earlier.

IF YOU FAIL TO APPEAR AT THE HEARING, JUDGMENT MAY BE GIVEN TO 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.

Date Issued by

Registrar

Address of court office

TO:

Doug Downey, Attorney General for the Province of Ontario,

Email- doug.downey@ontario.ca

And to, Michael Parsa for the Ministry of Community and Social Services

Email - MinisterMCCSS@ontario.ca, and to michael.parsa@ontario.ca

And to: Sarah Lorenz, Management at MHI,

Email - housing.manager@multifaithhousing.ca,

And to: Clara Friere, Senior Manager and Director, Ontario Works Ottawa,

Email- clara.friere@ontario.ca

And to: Lili Mukalay, Supervisor, Ontario Works,

Email: lili.mukalay@ontario.ca

And to: Elizabeth Kirby, Adjudicator Social Benefits Tribunal, SBT-2512-08602

Email- sbt.registrar@ontario.ca, and elizabeth.kirby@ontario.ca,

And to: Mathieu Regimbald, Case worker, Ontario Works

Email: Mathieu.regimbald@ontario.ca,

And to: Kelly Kritsch, Home for Good Subsidy Program,

Email: kelly.kritsch@ottawa.ca,

AND TO:

Attorney General of Ontario

By Way of email to: attorneygeneral@ontario.ca,

Crown Law Office,

Civil 720 Bay Street 8th Floor Toronto,

Ontario M7A 2S9

By Way of email to: cloc.reception@ontario.ca

The Applicant makes an Application for:

1. 1. An Order of Mandamus compelling the Respondents, and their respective agents, to immediately comply with their statutory duties and outstanding, legally binding administrative orders and the Mandamus for an Urgent Order filed with the Guelph and Ottawa Superior Courts, specifically,

- a. An Order compelling Elizabeth Kirby, Adjudicator of the Social Benefits Tribunal, and Lili Mukalay, Administrator of Ontario Works, to forthwith comply with the Standing Order in SBT File No. 2512-08602 to produce all basic needs receipts and records requested by the Applicant, and to render a decision in favour of the Applicant without further delay;
 - b. A Declaratory Order that the Social Benefits Tribunal and the Landlord and Tenant Board shall take Judicial Notice of the Trust Instrument established by the Applicant, and shall cease all administrative actions that constitute a trespass upon the Trust and the Applicant's fiduciary duties as Trustee to his Beneficiaries;
 - c. A Declaratory Order that the Respondents' collective failure to act constitutes a criminal breach of trust, conspiracy to obstruct justice, and willful blindness to the ongoing theft of public funds, for which they are jointly and severally liable;
 - d. An Order for General Damages in the amount of \$137,000,000.00 for the theft of public funds, trespass upon the Trust, aggravated harm, and systemic abuse of process;
 - e. Such further and other relief as this Honourable Court deems just.
2. The grounds for the application are:
- a. The Respondents have breached their statutory duties and are in Active, Willful (criminal) contempt of outstanding Orders of the Social Benefits Tribunal, causing ongoing and aggravated harm to the Trustee Applicant;
 - b. The Respondents have engaged in a pattern of bad faith, abuse of process, and fraud upon the court by deliberately refusing to acknowledge the existence and validity of the Applicant's Trust and by "ghosting" an Urgent Application for Mandamus before the Superior Court of Justice;

- c. The Respondents' collective inaction and "willful blindness" constitute a criminal conspiracy to obstruct justice and a breach of the public trust, contrary to their oaths of office and the Criminal Code of Canada;
- d. The decisions and actions of the Respondents are unreasonable, contrary to law, and made in bad faith, warranting the intervention of this Court pursuant to the Judicial Review Act, R.S.O. 1990, c. J.1, s. 2(1) and the Courts of Justice Act, R.S.O. 1990, c. C.43, s. 21(1).

For full particulars of the Applicant's demands, see the [Urgent Mandamus](#) requests served upon the Superior Court of Justice via email on August 13, 2026, and August 14, 2026, copies of which are hyperlinked as Exhibit "A" and "B"

3. The following documentary evidence will be used at the hearing of the application:

- a) [The Affidavit of the Applicant, King Sean, House von Dehn](#);
- b) [A true copy of the Social Benefits Tribunal Order in SBT File No. 2512-08602](#);
- c) [A true copy of the Trust Instrument](#) and related documents;
- d) [A true copy of the email correspondence requesting an Urgent Mandamus from the Superior Court of Justice, dated August 13, 2026](#) (Exhibit A)
- e) [A true copy of the Final Notice requesting an Urgent Mandamus from the Superior Court of Justice, dated August 14, 2026](#) (Exhibit B)
- f) All correspondence served upon the Respondents regarding the Notice of Liability for Breach of Public Trust and Criminal Conspiracy.

Sunday, August 16th, 2026

King Sean, House von Dehn,

Hand of Stephen,

The Kingdom of Heaven Found a Sean (an Express Trust Organization)

105-320 via Chianti Grove,

Nepean, Ont.,

K2J6J6

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