



SCHEDULE "A"

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Ministry of the Attorney General	Crown Attorney	Regional Municipality of Peel	7755 Hurontario Street Suite 100 (Mailbox Only) 5 <sup>th</sup> Floor, Office Suite 506 Brampton ON L6W 4T6	Tel/Tel: (905) 456-4777
Ministère du Procureur general	Procureur de la Couronne	Municipalité régionale de Peel	7755, rue Hurontario publipostage, suite 100 5 <sup>e</sup> étage, suite 506 Brampton ON L6W 4T6	

RECEIVED  
NOV 25 2011  
CROWN ATTORNEY  
BRAMPTON, ONTARIO

**REQUEST FOR CROWN DISCLOSURE**  
Part III Provincial Offence Charges

Request Date: NOV 25/2011

Please complete the information requested below and return this form to the Provincial Crown Attorney's Office in the A. Grenville and William Davis Courthouse, 5<sup>th</sup> Floor, 7755 Hurontario Street, Brampton, or send by facsimile to #905-456-4780.

Once disclosure becomes available, it will be faxed to you, or you will be contacted as to where and when you are to pick up this material

Provincial Prosecutor  
Crown Attorney's Office,  
Telephone: #905-456-4777  
Facsimile: #905-456-4780

NAME OF ACCUSED: SHAWN CASSISTA

OFFICER'S BADGE NUMBER: 1234 PEEL REGIONAL POLICE A  
O.P.P.

COURT LOCATION: Brampton or Mississauga A

OFFENCE DATE: MAY 17 2010 NEXT COURT DATE: JAN 4/2012

CHARGE(S): COMPULSORY INSURANCE ACT  
SEE SCHEDULE "A" ATTACHED

Contact Person: Shawn Cassista

Telephone Number: [REDACTED] Facsimile Number: \_\_\_\_\_

## SCHEDULE "A"



### Motion for further disclosure.

1. The Defense requests the definition of the word "person" as it applies to the Compulsory Automobile Insurance Act.

The word "person" is defined in numerous law dictionaries as 1) natural and 2) artificial:

Artificial relates to **corporations**, to **government**, to **non-living entities**.

Natural relates to man, to nature, to God's authority (according to the Canadian Charter of Rights and Freedoms).

2. For the purpose of preparing a defense that will eliminate confusion and save time at the Trial, further Disclosure regarding the above is needed and pertinent to the Defense.
3. A previous Motion for further Disclosure was executed on August 26<sup>th</sup>, 2011 for the same information whereas the Crown Prosecutor stated that a written statement would be provided to the Defense upon written request. That request was transmitted and received via fax on August 30<sup>th</sup>, 2011. The Defense has yet to receive a response from the written request. Attached is a copy of the transmission and confirmation of communication.
4. Motion to disclose a copy of the police officer's notes.



August 30, 2011

**Re: Motion for further Disclosure August 26, 2011**



Case/File # 3161-999-10-001942  
Offence Trial Date – January 4, 2012

On August 26<sup>th</sup>, the Defense motioned the court to order the Crown to provide further Disclosure in regards to the Compulsory Automobile Insurance Act.

The motion was to clarify the meaning of the word "person" as it applies to the act as the act itself fails to define the word. As well, there are numerous definitions to the word in various law dictionaries.

As stated in court by the Defense, Barron's Fifth Canadian Law Dictionary narrows the definition down to two: **natural** and **artificial**.

The Crown responded to this motion by stating it "believes" it applies to both "natural" and "artificial" persons but did not know for sure. The Crown stated on the record it will provide a written statement for the Defense upon written request (to the Crown Attorney's office). This is the official written request for that statement.

Please call 647-477-4650 when a *signed* written statement is available for pick up. Due to the time sensitive matter, please respond within a two (2) week period.

Thanks,

Shawn-Alan of the Cassista family



⌘ ⌘ ⌘ Communication Result Report ( Aug. 30. 2011 12:48PM ) ⌘ ⌘ ⌘

33 Market Transport

Date/Time: Aug. 30. 2011 12:48PM

File No.	Mode	Destination	Pg(s)	Result	Page Not Sent
5620	Memory TX	9054564780	P. 1	OK	

Reason for error  
 HANG UP OR LINE FAIL  
 NO ANSWER  
 EXCEEDED MAX. E-MAIL SIZE

E. 2) Busy  
 E. 4) No facsimile connection

August 30, 2011

**Re: Motion for Further Disclosure August 26, 2011**

Casefile # 3141-995-20-08142  
 Offense Trial Date - January 4, 2012

On August 26<sup>th</sup>, the Defence contacted the court to order the Crown to provide further Disclosure in regards to the Commodity Automobile Insurance Act.

The motion was to clarify the meaning of the word "person" as it applies to the act as the act itself fails to define the word. As well, there are numerous definitions to the word in various law dictionaries.

As stated in excerpt by the Defence, Barron's Fifth Canadian Law Dictionary reserves the definition down to two: natural and artificial.

The Crown responded to this motion by stating it "believes" it applies to both "natural" and "artificial" persons but did not have the case. The Crown stated on the record it will provide a written statement for the Defence upon written request (in the Crown Attorney's office). This is the official written request for that statement.

Please call 416-477-6020 when a signed written statement is available for pick up. Due to the time sensitive matter, please respond within a two (2) week period.

Thanks,

Sharon-Alice of the Criminal Society

