

FORM 14E

Courts of Justice Act

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

ZEXI LI

Plaintiff

-and-

**CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and
JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN
DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11,
JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16,
JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21,
JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26,
JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31,
JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36,
JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41,
JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46,
JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51,
JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56,
JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60**

Defendants

**AFFIDAVIT OF [REDACTED]
(Sworn February 5, 2022)**

I, [REDACTED], of City of Ottawa, in the Province of Ontario, MAKE OATH AND
SAY:

1. I have personal knowledge of the facts and matters herein deposed to.

2. I am a recently resigned member of the Royal Canadian Mounted Police (“RCMP”). After 15 years of service, I resigned from the RCMP after publicly speaking opposing the mandates.
3. I am currently working with the Adopt-a-Trucker Volunteer Coordination Center in support of the Freedom Convoy 2022 (“Freedom Convoy”). I am currently working on the ground on logistics, security and safety issues on the ground in Ottawa in support of the Freedom Convoy 2022 (“Freedom Convoy”). I have extensive experience in protective operations for large-scale events in the National Capital Region.
4. I have been involved in tactical planning for many of the large-scale events. I am keenly familiar with what is happening regarding the police presence down around Parliament Hill in the downtown area.
5. I have been working closely with the Ottawa Police Service, the RCMP, and the Parliamentary Protective Service. I have been liaising with them since early last week. Any information that I have received related to any public safety concerns has been immediately forwarded to the respective police service.
6. The safety of the trucker, the Ottawa public, the police, and the first responders is of paramount concern to the Freedom Convoy.
7. On the night of February 1, 2022, I received a complaint from the area of Rideau and Sussex about honking through the night. The caller was supportive of the Freedom Convoy. He said that most of residences in his area were vacant, but he wanted to convey his concern about some elderly residents. I explained that the Freedom Convoy leadership had agreed upon the following schedule out of respect for such concerns:

- a. Coordinated unified honk every half an hour for 1 minute, between the hours of 08:00 a.m. and 08:00 p.m., followed by silence between the hours of 08:00 p.m. to 08:00 a.m.
8. I confirmed this schedule in the days following with two separate truck drivers, who advised that during daytime hours, after the coordinated one-minute honk, was up to 10 minutes of distress (S.O.S.) honking signal. Both drivers confirmed that the silent hours between 08:00 p.m. and 08:00 a.m. was still in effect.
9. My primary concern is individuals or groups with potential to deliberately instigate conflict with the Freedom Convoy movement and to discredit the Freedom Convoy. We have seen circulating messaging in the media and social media about people associated with the Freedom Convoy being arrested and charged.
10. I have heard from very reliable sources that people from the movement were not associated with that. Offences related to property damage and just an assault, committed by agitators, were witnessed. This was reported to the police by one of the truckers and one of our volunteer security personnel, and which was ultimately handled by the Ottawa Police Service.
11. What I have seen with my own eyes, on the odd break that I get, are truckers and support of the movement feeding the homeless on Wellington Street and filling their backpacks with food. Truckers have taken a whole trailer full of food to the homeless shelter.
12. I have seen the truckers maintaining the cleanliness of city streets, including picking up discarded masks on the ground, centralized garbage collection, shoveling snow at the War Memorial and the Terry Fox statue, and decorating and providing security for the War

ZEXI LE

and

CHRIS BARBER, et al.

Plaintiff (Moving Party)

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

**ONTARIO
SUPERIOR COURT OF JUSTICE**

AFFIDAVIT OF
[REDACTED]

**JUSTICE CENTRE FOR
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