

ONTARIO COURT OF JUSTICE

B E T W E E N:

HIS MAJESTY THE KING

Respondent

and

EVAN BLACKMAN

Applicant

AFFIDAVIT OF EVAN BLACKMAN

I, Evan Blackman of [REDACTED], Ontario, hereby make oath and give evidence as follows:

1. I am the accused person in this criminal proceeding. I swear this affidavit in support of my motion seeking production of third-party records in the custody of the Royal Canadian Mounted Police (RCMP) and the Toronto-Dominion Bank (TD Bank).
2. I have personal knowledge of the evidence sworn to in this affidavit, except where otherwise stated to be based on information and belief. If the source of any information provided in this affidavit is not based on my own personal knowledge, I accurately describe the source of that information and believe it to be true.
3. I understand that I may be cross-examined on the contents of my affidavit if the Court so directs.
4. Beginning around January 28, 2022, vehicles and persons from all over Canada began to arrive in downtown Ottawa with the purpose of protesting federal and provincial government's legislative responses to the COVID19 pandemic. The vehicles included tractor trailer style

trucks and other commercial vehicles. The protest became known to participants and the public alike as the “Freedom Convoy”.

5. I am charged with the *Criminal Code* offences of mischief and obstructing police. I was arrested on February 18, 2022, during a police enforcement action aimed at removing protestors and vehicles from downtown Ottawa.
6. I was held in custody for approximately 6-7 hours. Eventually I was presented with a Form 10 Undertaking which I signed at 17:56 (this is the time stated on the Form 10 which I believe to be true). I was subsequently driven to a local Tim Horton’s and released at some time during the evening of February 18. I do not know the precise time of my release from custody.
7. Following my release from custody, I immediately realized that I was not able to obtain funds from my bank accounts. I bank exclusively with TD Bank and have three accounts. My bank accounts are as follows:

[REDACTED]
[REDACTED]
[REDACTED]

8. I phoned TD Bank to inquire as to why I was unable to access my funds. I was informed by a representative of TD Bank, whose name I do not remember, that my accounts were frozen pursuant to the *Emergencies Act*, and that there was nothing they could do.
9. I have subsequently learned through my legal counsel that the RCMP remained in communication with financial institutions regarding persons, vehicles, and companies “suspected of involvement in the illegal protest” in order to “assist financial institutions with their obligations under the *Emergency Economic Measures Order*”. The source of this information is the Minister’s Appearance Before the Standing Committee on Public Safety and National Security (SECU) on February 25, 2022, attached as **Exhibit “A”**.

10. Financial service providers began unfreezing accounts and credit cards/lines of credit on February 21 due to updated information provided by the RCMP. As of February 23, 2022, “enforcement action under the *EEMO* has culminated in the freezing of 246 financial products; the disclosure of 57 entities, which includes individuals and owners or drivers of vehicles involved in the blockades; 253 Bitcoin wallet addresses shared with virtual currency exchangers”. The source of this information is found in **Exhibit “A”**.
11. I do not have an independent recollection of when my accounts were unfrozen.
12. It is my intention to bring an application for a stay of proceedings under section 24(1) of the *Charter* as a result of the Federal Government’s actions in freezing my bank accounts. It will be my position that the *EEMO* created a statutory search and seizure regime that violates section 8 of the Charter.
13. I, by way of my legal counsel, have already made a request to TD Bank for the relevant records. To date, no records have been disclosed.
14. The Respondent Denis Beaudoin is a Superintendent for the Royal Canadian Mounted Police and the Director of Financial Crime, Federal Policing Criminal Operations. Mr. Beaudoin was responsible for overseeing the use of the economic measures put in place under the *Emergencies Act*. He developed the process used by the RCMP for verifying and sharing information with financial institutions. The source of this information is an affidavit sworn by Mr. Beaudoin in support of the Federal Government’s position in a similar proceeding: *Canadian Frontline Nurses et al v AG*. Attached as **Exhibit “B”** is the sworn affidavit of Dennis Beaudoin.
15. The Respondent [REDACTED] is the branch manager at TD Bank’s location at [REDACTED]
[REDACTED] This branch was my usual place of banking at the time of the events described herein.

16. With regards to my alleged role in the “Freedom Convoy”, my understanding of the Crown’s case, as contained in the Crown disclosure package, is as follows:

- a) I arrived in Ottawa at the earliest on February 17, 2022, the day before my arrest.
- b) There is no evidence that I supported the “Freedom Convoy” in any material sense.
- c) There is no evidence that I donated any money to the various fundraising activities associated with the “Freedom Convoy”.
- d) There is no evidence that I had any role in the Freedom Convoy at all, prior to February 17, and particularly not a leadership role.

SWORN / AFFIRMED REMOTELY by)
videoconference by Evan Blackman, of)
[REDACTED], in the Province of Ontario,)
before me at the City of [REDACTED], in the)
Province of Ontario this 1st day of April,)
2025 in accordance with O.Reg. 431/20)
Administering Oath or Declaration)
Remotely)



DARREN LEUNG, LSO # 87938Q
Barrister & Solicitor
for the Province of Ontario



EVAN BLACKMAN

EXHIBIT “A”

Emergency Economic Measures Order

Proposed Response:

- On February 14, 2022, the Federal Government invoked the *Emergencies Act* as a strategic, targeted, and time sensitive response to address the current crisis.
- In relation to the *Act*, the Government issued the *Emergency Economic Measures Order*, which allowed law enforcement agencies to work more closely with Canadian financial service providers, and provided additional measures to monitor and disrupt financial activity associated with the illegal blockades.
- These measures included a requirement for financial service providers to determine whether they have in their possession or control property that belongs to a designated person participating in the blockade, and to disclose this information to the RCMP or CSIS.
- It authorized federal, provincial, and territorial government institutions to disclose information to any Canadian financial service provider when it was satisfied that the disclosure will contribute to the application of the Order.
- This allowed law enforcement agencies to share the identity of designated persons with financial service providers, enabling them to cease their dealings with those designated persons at their discretion.
- The RCMP has provided financial institutions with the identities of individuals involved in the Ottawa protest, and of owners and/or drivers of vehicles who did not want to leave the area impacted by the protest. At no time did the RCMP disclose information on donors or on those who purchased merchandise linked to the illegal protests.
- The Order also required insurance companies to cancel or suspend the insurance policy for any vehicle taking part in a prohibited assembly. This sent a strong message to the owners and operators of the vehicles implicated that their vehicle should go home.
- The measures contained in the Order assisted law enforcement by disrupting the funding behind the illegal blockades and weakening the ability to re-form them, increasing the scope of financial transaction information that may be received by FINTRAC, and making more information available to support investigations by law enforcement.

If pressed on actions taken as a result of the order:

- As of February 23, 2022, enforcement action under the *Emergency Economic Measures Order* has culminated in the freezing of 246 financial products; the disclosure of 57 entities, which includes individuals and owners or drivers of vehicles involved in the blockades; 253 Bitcoin wallet addresses shared with virtual currency exchangers; and, the proactive freezing of the account of a payment processor by a financial institution.
- Only financial institutions have discretionary authority to freeze and subsequently unfreeze financial accounts. To assist financial institutions with their obligations under the Order, the RCMP remained in communication with the financial institutions on persons, vehicles and companies suspected of involvement in the illegal protest.
- While the Order was still in place, the RCMP went back to financial institutions with some updated information about certain entities whose status may have changed pertaining to the illegal protest activity. This new information could then be assessed alongside all other information to help inform decisions to unfreeze certain accounts.
- Financial service providers began unfreezing accounts and credit cards/lines of credit on February 21 due to updated information provided by the RCMP. The vast majority of these have either been unfrozen or have been approved to be.
- On February 23, 2022, the Federal Government announced that it would be revoking the *Emergencies Act* since the situation is no longer an emergency and existing laws and bylaws are now sufficient to keep people safe.
- The economic measures under the Order were important in disrupting the funding of the groups behind these illegal blockades, and in weakening their ability to re-form them.
- Now that the *Emergency Act* has been revoked, the *Emergency Measures Regulations* and *Emergency Economic Measures Order*, and their measures are also automatically revoked.

If pressed on Charter concerns of the order:

- As we have stated previously, any steps taken by the Government under the *Emergencies Act* must be consistent with the *Canadian Charter of Rights and Freedoms*, and must be reasonable and proportional to the risks to the public health and safety of Canadians.
- The illegal blockades we witnessed were well-funded and constituted a serious threat to national security. As such, the measures contained in the *Emergency Economic Measures Order* were reasonable and proportional to the threat posed.
- Importantly, they applied to persons engaging in prohibited activity as outlined in the *Emergency Measures Regulations*. As such, the Order ceased to apply in respect of a person's property, transactions and account when such persons stop participating in those activities.
- Financial service providers also had an obligation to determine on a continuing basis whether they are in possession or control of property that is owned by a designated person, which ensured information was up to date.

If pressed on what issues are being addressed by the economic measures in the order:

- Prior to the Order, crowdfunding platforms and some payment service providers were not subject to registration and reporting requirements to FINTRAC under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA).
- By including crowdfunding platforms and payment service providers, the Government was able to mitigate the risks that these platforms received funds for illicit purposes.
- In addition, existing federal financial institutions statutes do not require financial service providers to review their business relationships and cease dealing with persons conducting illegal activities, such as the illegal blockades.
- As such, the economic measures in the Order provided crucial authorities to further bolster the Government's ability to disrupt the financing of these illegal actions.

If pressed for more details on the frozen payment processor account:

- It was reported to the RCMP that the value of the payment processor account was \$3.8M.
- We are unable to disclose any additional information at this time about this account, to avoid any unnecessary reputational damage to the payment processor involved.

If pressed on implications of revoking *Emergencies Act* and economic measures in the order

- All powers granted by the *Emergency Regulations* and *Emergency Economic Measures Order* disappear once the declaration and regulations are revoked.
- However, investigations into offences that took place while the measures were in force can continue. Charges may be laid and investigations and prosecutions can continue, subject to police discretion and to prosecution decisions as to whether there is a reasonable prospect of conviction and whether it is in the public interest to proceed.
- If property seized under the *Emergency Regulations* is required as evidence in an investigation or for a prosecution, it may be retained by police in accordance with the usual *Criminal Code* provisions. Property seized but not required as evidence may be returned. The normal provisions of the *Criminal Code* regarding the return of such property apply.

Background:

On February 14, 2022, the Government of Canada declared a public emergency, invoking the *Emergencies Act*, along with the *Emergency Economic Measures Order* (the Order) and the *Emergency Measures Regulations* (the Regulations). The provisions of the Order, as outlined above, came into force immediately on Tuesday, February 15, 2022.

MPs in the House of Commons voted to affirm use of the *Emergencies Act* on Monday February 21, 2022. The *Emergencies Act* was revoked by the Government of Canada the afternoon of February 23, 2022, formally ending the state of emergency.

Collectively, the Order and the Regulations were intended to limit funding of illegal blockades and restore public order. This order contained the following key authorities:

Reporting Requirements for Crowdfunding Platforms

- The Order extended the scope of the reporting requirements under the *Proceeds of Crime (Money Laundering and Terrorist Financing Act)* (PCMLTFA) to cover crowdfunding platforms and payment providers, inclusive of all forms of transactions, including digital assets such as cryptocurrencies.

- The Order required crowdfunding platforms and payment service providers that are in possession or control of any funds that are owned, held or controlled by or on behalf of a designated person ^[1] to register with and report suspicious and large value transactions to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC).

- Prior to the Order, crowdfunding platforms and some payment service providers were not subject to obligations under the PCMLTFA.

Temporary Cessation of Financial Services

- Canadian financial service providers were required to temporarily cease providing financial services if the institution suspects that a personal or corporate account is being used to further the illegal blockades, the could immediately freeze or suspend an account without a court order. Specifically, they were required to cease:
- dealing in any property owned, held or controlled, directly or indirectly, by a designated person or by a person acting for that designated person, or facilitating any transaction related to such a dealing;
- making available any property or financial support (including virtual currency) to or for the benefit of a designated person or to a person acting for a designated person;
- providing any financial or related services to or for the benefit of any designated person; and
- acquiring any financial or related such services from or for the benefit of any such person or entity.
- This applies to all funds, including those held in a deposit, chequing, savings, or trading account, and to cryptocurrency wallets, lending products, investment assets, and insurance policies for vehicles used in the illegal blockades.

Reporting certain property and assets to RCMP and CSIS

- Financial institutions and other reporting entities under the PCMLTFA (including crowdfunding platforms and payment service providers) must determine, on a continuing basis, whether they are in possession or control of property that is owned, held or controlled by or on behalf of an individual or entity that is engaged, directly or indirectly, in an activity which is prohibited in sections 2 to 5 of the *Regulations* (i.e. designated person).

Disclosure of Information:

- The order provides federal, provincial, and territorial government institutions with new authority to share relevant information with banks and other financial services providers named in the Order, if the disclosing institution is satisfied that the disclosure will contribute to the application of the Order.

Some of the new temporary measures in the Order built on Canada's AML/ATF framework. Prior to the order, crowdfunding platforms and some payment service providers were not subject to obligations under the PCMLTFA. By extending certain PCMLTFA requirements to include crowdfunding platforms and the payment service providers, the Government was able to mitigate the risks that these platforms could be used for illicit purposes. It also allowed for FINTRAC to receive increased financial transaction information, and makes more information available to support investigations by law enforcement.

Other authorities were intended to address gaps highlighted by the illegal blockade actions. In particular, existing federal financial institutions statutes do not include an authority to require financial service providers to review their business relationships and cease dealing with persons conducting illegal activities. The laws and regulations covering other financial services providers, such as securities dealers or funding platforms, vary by province. There is no overall authority to restrict the funds that go to support illegal assemblies. As such, the Order provided crucial authorities in these areas to further bolster the Government's ability to disrupt the financing of these illegal actions.

Any steps taken by the Government under the *Emergencies Act*, including the Order, must be consistent with the *Canadian Charter of Rights and Freedoms*, and must be reasonable and proportional to the risks to the public health and safety of Canadians. For instance, the measures cease to apply in respect of a person's property, transactions and account when they stop participating in an illegal assembly. In other words, financial entities will be able to resume their dealings with persons that have stopped participating in the unlawful activities. RCMP's federal Financial Crime units are also working with financial institutions, to assist them, when possible, to determine when assets can be unfrozen.

Enforcement of the Order:

As key partners in Canada's Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) Regime, FINTRAC, CSIS and the RCMP operate within well-defined mandates that give them legislative authorities to counter illicit financial activity. The authorities in the Order were intended to enhance law enforcement investigations and disruption of blockades, and make it more challenging to use crowdfund platforms to fund illegal activities.

The groups behind the blockades were well-funded, with financial support being provided through a variety of means, including through crowdfunding platforms and cryptocurrency-based platforms. The Order allowed law enforcement to work more closely with Canadian financial institutions and has enhanced the effectiveness of law enforcement investigations into the blockades.

- There have been multiple disclosures from the RCMP to various financial institutions, including banks and credit unions, the Canadian Bankers Association, the Investment Industry Regulatory Organization of Canada, the Canadian Securities Administrators, and the Mutual Fund Dealers Association of Canada.
- Through social media sources and open source analysis, the RCMP identified information on how the crowdfunding campaign organizers are planning the dissemination and management of Bitcoin funds raised.
- The RCMP shared information with currency exchangers about bitcoin addresses linked to the funding of blockades, and also reached out to non-traditional financial institutions, including different cryptocurrency ATM operators.
- As of February 23, 2022, enforcement action under the Emergency Economic Measures Order has culminated in the freezing of 246 financial products; the disclosure of 57 entities, which includes individuals and owners or drivers of vehicles involved in the blockades; 253 Bitcoin wallet addresses shared with virtual currency exchangers; and, the proactive freezing of the account of a payment processor by a financial institution.
- Financial service providers began unfreezing accounts and credit cards/lines of credit on February 21 due to updated information provided by the RCMP. The vast majority of these have either been unfrozen or have been approved to be.

Under the Order, designated entities have expanded requirements to report to CSIS certain activities linked to designated persons. CSIS is engaging with its financial partners to ensure that disclosures relate to its national security mandate. Under the PCMLTFA, FINTRAC makes intelligence disclosures to CSIS when legislated thresholds are met. If a reasonable nexus to national security is determined, CSIS may use the information as part of any investigation into threats as defined under section 2 of the *Canadian Security Intelligence Service Act*.

Revocation of the *Emergencies Act*

Since the declaration of a public order emergency was revoked, the *Emergency Measures Regulations* and the *Emergency Economic Measures Order* are also revoked. Investigations into offences which occurred while the measures were in force can continue after the Regulations were revoked, subject to police discretion and to prosecution decisions as to whether there is a reasonable prospect of conviction and whether it is in the public interest to proceed.

Property seized under the Regulations may be retained by police in accordance with the usual *Criminal Code* provisions if it is required as evidence in an investigation or for a prosecution. Property seized but not required as evidence may be returned. The normal provisions of the *Criminal Code* regarding the return of such property apply.

Footnotes

- ^[1] A **Designated Person** means any individual or entity that is engaged, directly or indirectly, in an activity prohibited by sections 2 to 5 of the *Emergency Measures Regulations*.

Date modified: 2022-06-07

EXHIBIT “B”

FEDERAL COURT

B E T W E E N:

CANADIAN FRONTLINE NURSES AND KRISTEN NAGLE

Applicants

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF DENIS BEAUDOIN

Court File No.: T-316-22

FEDERAL COURT

B E T W E E N:

CANADIAN CIVIL LIBERTIES ASSOCIATION

Applicant

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF DENIS BEAUDOIN

Court File No.: T-347-22

FEDERAL COURT

BETWEEN:

CANADIAN CONSTITUTION FOUNDATION

Applicant

and

ATTORNEY GENERAL OF CANADA

Respondent

AFFIDAVIT OF DENIS BEAUDOIN

FEDERAL COURT

B E T W E E N:

JEREMIAH JOST, EDWARD CORNELL, VINCENT GIRCYS, and HAROLD RISTAU

Applicants

and

**GOVERNOR IN COUNCIL, HER MAJESTY IN RIGHT OF CANADA, ATTORNEY
GENERAL OF CANADA, and MINISTER OF PUBLIC SAFETY AND EMERGENCY
PREPAREDNESS**

Respondents

AFFIDAVIT OF DENIS BEAUDOIN

I, Denis Beaudoin, of the city of Ottawa, in the Province of Ontario, swear that:

1. I am a superintendent for the Royal Canadian Mounted Police (RCMP). My current position is Director of Financial Crime, Federal Policing Criminal Operations. I have served in this position since 2021. My responsibilities in this role include overseeing financial crime operations for the RCMP nationally.
2. In this capacity, I was responsible for overseeing the use of the economic measures put in place under the Emergencies Act proclamation. I developed the process used by the RCMP for verifying and sharing information with financial institutions as described below. As such, I have personal knowledge of the information in my affidavit.

Economic Order and Regulations

3. On February 15, 2022, the Governor General in Council enacted the Emergency Economic Measures Order found at P.C. 2022-108 of the CTR (the Order), as well as the Emergencies Measures Regulations found at P.C. 2022-107 of the CTR (the Regulations), pursuant to its proclamation the previous day that a public order emergency existed.
4. On February 23, 2022, the Order and Regulations were revoked and ceased to apply.
5. The Order and Regulations did not apply retroactively and applied only to individuals who acted in contravention of sections 2 to 5 of the Regulations between February 15 and 23, 2022.

Objective and Scope of the Order and Regulations

6. The RCMP's primary role with respect to implementing the measures was to provide financial service providers with information gathered by police about people and companies potentially involved in illegal activities, which the financial service providers could use to ensure their compliance with the Order.
7. The Order gave financial institutions the ability to freeze financial products of individuals and companies involved in prohibited activities and gave law enforcement authority to share information with financial institutions with the ultimate goal to end illegal acts peacefully.

Implementation of the Order

8. Neither the Order nor Regulations specified a procedure through which financial service providers would identify individuals or entities that met the definition of "designated person" under the Order.

9. In practice, the police provided financial service providers with information about particular individuals or entities, which the financial service providers could use in conjunction with other information at their disposal to make their own determinations about whether they needed to take steps to comply with the Order.
10. Once the Order came into effect, the RCMP worked closely with municipal and provincial policing partners, including the Ontario Provincial Police (OPP) and Ottawa Police Service (OPS), to collect relevant information regarding persons, vehicles and entities that were believed to be directly or indirectly involved in prohibited activities.
11. The RCMP served as the conduit for sharing all information between police and financial service providers. The OPP and OPS provided the RCMP with relevant information in their possession and the RCMP validated this information and then shared it with financial service providers. I attach as **Exhibit "A"** a copy of a blank template that the RCMP used to provide the information it described, if available, to financial institutions.
12. During the eight days that the Order was in place from February 15 to 23, 2022, the RCMP disclosed information to banks, the Canadian Bankers Association, the Investment Industry Regulatory Organization of Canada, the Canadian Securities Administrators, credit unions, and the Mutual Fund Dealers Association of Canada.
13. The RCMP shared two main types of information with financial service providers: information obtained from the OPP and OPS regarding individuals already identified as part of their criminal investigations into the illegal protests and blockades; and information regarding trucks and other vehicles located in downtown Ottawa.
14. Initially, the RCMP shared with financial service providers the identities of 15 entities that the OPP and OPS had identified as suspects of their criminal investigation. Financial service providers used this information to determine whether to take action in order to comply with their obligations under the Order.
15. With respect to the second type of information, the OPP collected licence plate information and other identifying information of vehicles blockading downtown Ottawa. The RCMP then collected information from police and public sources to corroborate the presence of individuals and vehicles in the illegal protest. This information was then shared with financial service providers so that they could decide whether to take action in order to comply with the Order.
16. The RCMP and other law enforcement agencies focused their efforts on identifying and disclosing information pertaining to individuals and entities who were actively involved in illegal action, either by organizing or influencing the illegal activities or by being present at the illegal protest.

17. The RCMP did not disclose information pertaining to those who made donations in support of the protests or who purchased merchandise supporting the protests as it would have had no immediate impact to end the protest peacefully.
18. The RCMP communicated information to financial institutions but did not advise on the methods financial institutions should use to ensure compliance with the Order.
19. In a number of instances, the RCMP decided to not disclose information to the financial service providers following the investigative phase. The reasons for not disclosing were that there was not enough information to believe the person or entity was involved, the plate was invalid in the police database system, the person was attempting to leave but was unable, or it was no longer believed the person or entity was involved (either left on their own accord or were removed by police).
20. In total, the RCMP disclosed information on approximately 57 entities and individuals to financial service providers and approximately 257 accounts were frozen by financial institutions pursuant to the Order. Some individuals or entities had multiple accounts or services frozen.
21. Additionally, the RCMP identified and disclosed 170 Bitcoin wallet addresses to virtual currency financial service providers via a series of cryptocurrency alerts. These accounts received funds linked to the HonkHonkHodl crowdfunding campaign, which raised 20.7 Bitcoin with a value of between \$1 million to \$1.2 million during the period during which the Order was in force. No personal information was included in those alerts and this information was available publicly. I attach the three cryptocurrency alerts provided by the RCMP to financial service providers as **Exhibit "B"**.
22. The alerts noted that these e-wallets were linked to a joint RCMP and OPP/OPS investigation and directed the providers to cease facilitating transactions involving these e-wallets and to disclose relevant transaction information to the RCMP.
23. The RCMP clearly communicated to these electronic financial service providers that the Order was not to be applied retroactively and could only be applied while the Order was in effect.
24. Although the RCMP did not give information to financial institutions to enable them to freeze accounts of persons who had donated for use in the convoys and illegal blockades, some information was publicly available about donations that had been made to "GiveSendGo" for use in the illegal blockades.

Efforts to Minimize Negative Impact

25. The RCMP attempted to contact many of the individuals or entities whose information was to be disclosed to financial service providers, in order to re-confirm their ongoing participation in prohibited activities. For example, a number of individuals contacted by the RCMP confirmed that they were participating in the blockade in Ottawa and that they refused to leave. At that point, the RCMP advised the individuals of the Order and the risk that their bank accounts could be frozen.
26. Some people indicated when contacted that they wanted to leave, but were not in a position to do so because the streets were not cleared. These people were instructed to be ready and to make sure their truck was ready to leave when the streets were cleared. The information on these persons was not provided to the financial service providers.
27. The persons identified by the OPS and the OPP as suspects in their criminal investigation were not contacted prior to their information being shared.
28. After the illegal blockade was cleared, the RCMP reached out to some people to ascertain if it was their intention to return. Some indicated that they were not going back because they did not want their accounts frozen.
29. The Order imposed on financial service providers a duty to determine on a continuous basis if they were in possession of property owned, held or controlled by or on behalf of a designated person. Individuals who had their account frozen would have to contact their financial service provider to make arrangements to unfreeze their account. They could do this as soon as they stopped participating in the activities targeted by the Order. The RCMP facilitated this process by remaining in communication with financial service providers to assist them in assessing the involvement of their clients in the illegal activities.
30. On February 21, 2022, the RCMP communicated with the financial service providers and advised them that, without taking into account independent information available to financial entities, the RCMP no longer believes the individuals or entities disclosed were engaged in conduct or activities prohibited under the EMR, and therefore no longer met the criteria of a designated person under the Order. Attached as **Exhibit "C"** is an email with the subject line "Emergency Economic Measures Order (EEMO) - SITUATIONAL UPDATE."
31. Attached as **Exhibit "D"** is a copy of the RCMP statement about the unfreezing of accounts released by the RCMP on February 23, 2022.
32. The RCMP did not share information with insurance providers because the goal remained to facilitate a peaceful end to the blockade by allowing fully insured drivers to remove their vehicles from downtown Ottawa of their own volition.

33. As far as I am aware, all accounts that were frozen under the Order are now unfrozen.

Utility of the Order

34. The powers granted under the Order allowed the RCMP and other law enforcement agencies to work closely with Canadian financial institutions to implement asset freezes that strongly encouraged individuals to leave the illegal protests and deter the counselling of others to engage in prohibited activities. It also deterred protesters from staying in the area and coming back.
35. I believe the additional powers allowed by the Order played a role to resolve effectively an unprecedented, urgent, and rapidly evolving situation. The information the RCMP provided to financial service providers helped incentivize many involved in the blockade of downtown Ottawa to leave peacefully and minimized the risk of a violent end to the blockades by depriving those engaged in prohibited activities of access to funds.

Applicants Edward Cornell and Vincent Gircys

36. The RCMP disclosed the names of the Applicants, Edward Cornell and Vincent Gircys to financial institutions due to their overt participation in prohibited activities in Ottawa.
37. Both Mr. Cornell and Mr. Gircys participated in a press conference on February 16, 2022 at which they urged people to come to Ottawa to participate in prohibited activities. The press conference is posted on Instagram at [Kristen Nagle on Instagram: "Press conference with Daniel Bulford, Vincent Gircys, Eddie Cornell."](#)
38. I make this affidavit in response to the applications for judicial review in court file numbers T-306-22, T-347-22, T-316-22, and T-382-22 and for no other or improper purpose.

SWORN BEFORE ME at the City of
Ottawa, in the Province of Ontario
this 4th day of April, 2022

A Notary Public in and for the
Province of Ontario

))))))


DENIS BEAUDOIN

This is Exhibit "A" referred to in the
affidavit of

Denis Beaudoin

sworn before me this April 04/2022
day of April A.D., 2022



Notary Public in and for
the Province of Ontario

**Marc Germain Tremblay, a Commissioner etc.,
Province of Ontario, for the Government of Canada,
Department of Public Safety and Emergency Preparedness.
Expires November 25, 2022.**



File 2022-198524

Disclosure of Information

The following report is made pursuant to the *Emergency Economic Measures Order* (SOR/2022-22) and *Emergency Measures Regulations* (SOR/2022-21) enacted under the *Emergencies Act* on February 15th, 2022.

I, _____, am a regular member of the Royal Canadian Mounted Police (RCMP), currently posted to the RCMP's National Division (Ottawa area). I am engaged in the collection and disclosure of information to entities that have a duty to determine as defined in Section 3 of the *Emergency Economic Measures Order*.

The information being disclosed is relevant to individuals or entities that are engaged, directly or indirectly, in an activity prohibited by sections 2 to 5 of the above noted *Emergency Measures Regulations*.

The specific disclosure is related to the following individuals or entities:

The information collected has been compiled and summarized in the attached Appendix "A".

This document is the property of the Royal Canadian Mounted Police (RCMP). It is loaned to your agency on the understanding that it is not to be further disseminated, reclassified, or used in affidavits, court proceedings, or other legal or judicial process without the consent of the originator. Distribution within your agency is to be done on a need-to-know basis. The document is to be protected in accordance with normal safeguards for law enforcement information. Please contact the sender for any clarifications regarding the information or the caveat.

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APPENDIX "A"



File 2022-198224

VEHICLE PROFILE

Registered Owner

Name:

DOB :

Address (last known) :

Date of search:

Complete by :

Vehicle information

- XXX

Database checks

CPIC:

- XXX

PROS:

- XXX

PIP:

- XXXX

Open Source

Social Media Queries

Facebook:

Twitter:

LinkedIn:

Other:

Corporate Checks

Company involved:

Company Inquiries (reach out /call)

Company's involvement:

Vehicle Involved

Synopsis:

OCC Cameras

Observations:

Other Relevant Information

Information collected:

This is Exhibit "B" referred to in the
affidavit of

Denis Beaudoin

sworn before me this April 04, 2022
day of April A.D., 2022



Notary Public in and for
the Province of Ontario

**Marc Germain Tremblay, a Commissioner etc.,
Province of Ontario, for the Government of Canada,
Department of Public Safety and Emergency Preparedness.
Expires November 25, 2022.**

CRYPTOCURRENCY ALERT

The Ontario Provincial Police and Royal Canadian Mounted Police are currently investigating cryptocurrency donations being collected in relation to illegal acts falling under the scope of the *Emergency Measures Act*.

Pursuant to the *Emergency Economic Measures Order*, under subsection 19(1) of the *Emergencies Act*, there is a duty to cease facilitating any transactions pertaining to the following cryptocurrency address(es):

Any information about a transaction or proposed transaction in respect of these address(es), is to be disclosed immediately to the Commissioner of the Royal Canadian Mounted Police, at CryptocurrencyNHQ-CryptomonnaieDG@rcmp-grc.gc.ca.

Asset	Address
LTC	ltc1qqhzc2dflesccd5gx6ugqqgcplzakrk8w/xl8zq
ADA	addr1qxwxppd3ahfsh43f88h4jn8ngrum64fe6meck3nnwkwgtsp6elsk4xhyrdtm5v6tnq3ulw9u9gcmvkhrij4xcu3sm60hqtz3wuy
XMR	423nPDQqsPrAAGFShUBMrYQQCgb2562iLLWu1dZyEGEGsaxvfpNxWtDjreSUzwqWQCxi6GrSz8jtYWjS4pW9mK9DoBVDWo
ETH	0x859481ef7dac321078547f50c756c8924eab183f
ETC	0x88cd1d4611d456357ef8620450d3121672305d03
BTC	bc1qvvt2l3v508lmpal067kghhm6x6nsm70rgwhx
BTC	1Pk9TAxrXE1sQeYx3KXN77TfNjBDPxeEnk
BTC	bc1q82ejx54e9ra0la9n5whcaqegdr2f5j6ep0kep7
BTC	bc1qlc2gpmzrr9gded07d9a40lt2lq7pp2v7h4c5jx
BTC	bc1q2xjld87z45k2fuz48dqhntgh3e0k80ft0a46jd3ftwrqt4fnnyjqftd0ur
BTC	bc1q3jsfd54ja2jxnumjwq2ds6qn0yt0mye7lwvdmyft3a8a5w9d8hkqxf6az
BTC	bc1q48chzsuwxu7cz82p83mpekdn0u44c223r4dzsdd98d8l03ws7es484z23
BTC	bc1q4hqvw7a806yc8554nskuyqc4jc6juywzxcgprkOn25rtcj5z3dkqey0h9f
BTC	bc1q7r7escgmm7nq2jhc92nc2uh7tw3vzextspge65ts06243pensl2spf67vn
BTC	bc1q8lrztgk9tkedvhu6hzvvc7ps2cf6t2t4hj5jdf6p38asc407wxzsl40gkx
BTC	bc1q8tf0hn3vda0pgkhej73unz338wstxvll9qrvy5hj3rtwah2j6mlqx3ce99
BTC	bc1q96z7hleyh2fvqmgc8s9yw0650u3uwjv7mrpsfj2ltz8wvctmcnsyhk50c
BTC	bc1qcg44z6ly3h3635gfzkeh4lg22ks7ndy3dzzh0qyv3eqmzrwehnsk58gwr
BTC	bc1qfcrw4nf659e4s8d9yaldltac75awrpqeqh76du68qzw8q0m7276sw0q3uh

BTC	bc1qg76ahdnvxxwfd8l05wh0u4y54sht2s4djqmp2vt0levqz7s62l9q4wh33n
BTC	bc1qhdek8my95y8pvxvj8lwmvdqcrkf6a5ny6l9lqyw42s2tz8cgg0qrrz8yf
BTC	bc1qsdherstd6f8rswt0pklv3gckwtjtaszswzlmgrat9hkvppwqpsvcd39z
BTC	bc1qt6t5lddw7vxdzmcz0cdl6xnyrfmu2ywd64g0pw6k7czwl5xhfxs3e5sff
BTC	bc1qv3aa6wepvtlcy7kuvpmfzar93ku2yppp72tm0zfcj20h04r58sn7vvhq




BTC	bc1qv7k0hltgg5vdquy86z8m48wp7ul92hdddp2emh2ppra0slzvg86q8uv9g9
BTC	bc1qxxwx7r30fspqng769h080rx4y2eksmwcecvrwyk7uwyl6lr0hnsllr9re
BTC	bc1q3ufme0prwe7xwacj32jt89r997xcwh2wmjkg129acetvf3q0wz4sp50j05
BTC	bc1qun9qcxesc6avaa30anl0jvs36h3cy6nq7xh36yvx9frmqc8v6khq4nwnv0
BTC	bc1qzrst06qg2ve7x9a45z94hal882ecx9eqvcxttpq400cvqk6hkr6q0rcvjs
BTC	bc1q86ceuvvc0580rddxmqujhu3huxkcykrns2jah4vhqnlr67jdkh43sd5gcgr
BTC	bc1qepl9mm4qq7eqtvhe3ys3ymwvs4z3rmyuhvfs3scsysjndqkvhepsfp6ven
BTC	bc1qv7k0hltgg5vdquy86z8m48wp7ul92hdddp2emh2ppra0slzvg86q8uv9g9
BTC	bc1qahvu2rtjyze9gn50skcs2q06vpfnznwdnsa9scxv5y6axudksskq2ku6hd
BTC	bc1qg3aeueyd4947tk9kfnzhrssxgjy0ctn8zcdg0tk0gchzwfq7zq4zlnse

Thank you for your assistance with this investigation,

CryptocurrencyNHQ-CryptomonnaieDG@rcmp-grc.gc.ca

The Ontario Provincial Police and Royal Canadian Mounted Police are currently investigating cryptocurrency donations being collected in relation to illegal acts falling under the scope of the *Emergency Act*.

Pursuant to the *Emergency Economic Measures Order*, under subsection 19(1) of the *Emergencies Act*, there is a duty to cease facilitating any transactions pertaining to the following cryptocurrency address(es):

Any information about a transaction or proposed transaction in respect of these address(es), is to be disclosed immediately to the Commissioner of the Royal Canadian Mounted Police, at CryptocurrencyNHO-CryptomonnaieDG@rcmp-grc.gc.ca.

[illegible]

RCMP-GRC		OPP

RCMP-GRC		OPP

Thank you for your assistance with this investigation, CryptocurrencyNHQ-CryptomonnaieDG@rcmp-grc.gc.ca.

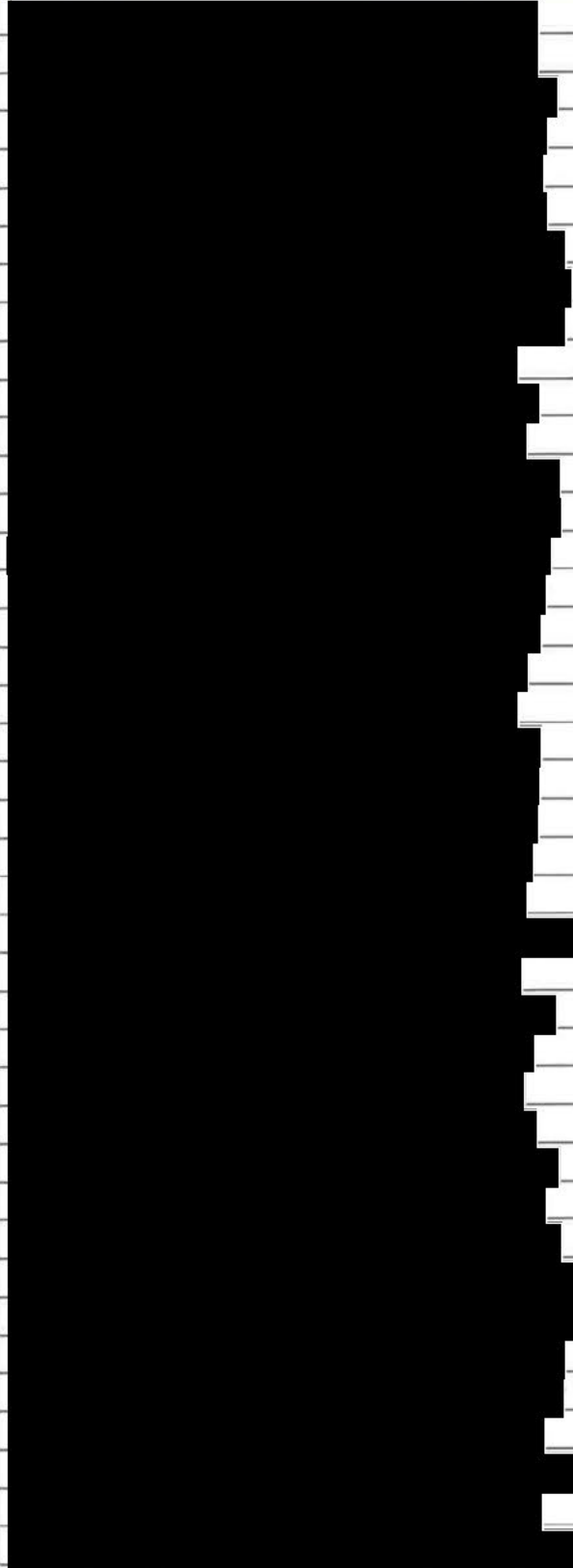
CRYPTOCURRENCY ALERT

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RCMP-GRC 		
[REDACTED]		
[REDACTED]		
[REDACTED]		
[REDACTED]		

Thank you for your attention to this matter,

CryptocurrencyNHQ-CryptomonnaieDG@rcmp-grc.gc.ca.

This is Exhibit "C" referred to in the
affidavit of

Denis Beaudoin

sworn before me this April 04/2022
day of April A.D., 2022



Notary Public in and for
the Province of Ontario

**Marc Germain Tremblay, a Commissioner etc.,
Province of Ontario, for the Government of Canada,
Department of Public Safety and Emergency Preparedness.
Expires November 25, 2022.**

From: [REDACTED]
Sent: February 21, 2022 1:14 PM
To: [REDACTED]
Subject: RE: Emergency Economic Measures Order (EEMO) -
 SITUATIONAL UPDATE

Good day,

Following the publishing of the *Emergency Economic Measures Act* (EEMO), the RCMP and its policing partners have provided you information regarding specific individuals and entities in an effort to contribute to the application of the EEMO by assisting to identify property belonging to people who were engaged in the illegal activities set out in the *Emergency Measures Regulations* (EMR). Following these disclosures, financial assets were frozen.

Not taking into account independent information available to financial entities, the RCMP no longer believes the above-mentioned individuals or entities are engaged in conduct or activities prohibited under the EMR, and therefore no longer meet the criteria of a designated person under the Order.

As the law is still currently in effect, listed entities must determine on a continuing basis whether they are in possession or control of property that is owned, held or controlled by, or on behalf of, a designated person.

Should information about designated persons becomes available, the RCMP may decide to disclose further information to financial entities to contribute to the application of the EEMO.

Thank you,
 Kelley

[REDACTED]

This document is the property of the Royal Canadian Mounted Police (RCMP). It is loaned to your agency on the understanding that it is not to be further disseminated, reclassified, or used in affidavits, court proceedings, or other legal or judicial process without the consent of the originator. Distribution within your agency is to be done on a need-to-know basis. The document is to be protected in accordance with normal safeguards for law enforcement information. Please contact the sender for any clarifications regarding the information or the caveat.

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From: FPCO Financial Crime / OCPF Criminalité Financière
Sent: February 21, 2022 12:23 PM
To: FPCO Financial Crime / OCPF Criminalité Financière [REDACTED]
Subject: Emergency Economic Measures Order (EEMO) - SITUATIONAL UPDATE

Good afternoon,

We would like to reassure you that it remains our priority to communicate information that may assist listed entities with their assessment to unfreeze financial products related to the disclosures of designated person information.

Although we are not currently in a position to do that yet, we anticipate being able to provide you with relevant information later this afternoon.

Thank you for your continued patience and understanding as we work through this complex time together.

Kelley



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affidavit of

Denis Beaudoin

sworn before me this April 04, 2022
day of April A.D., 2022



Notary Public in and for
the Province of Ontario

**Marc Germain Tremblay, a Commissioner etc.,
Province of Ontario, for the Government of Canada,
Department of Public Safety and Emergency Preparedness.
Expires November 25, 2022.**



STATEMENT

Enforcement under the *Emergencies Act – Unfreezing of accounts*

The *Emergencies Act* has allowed law enforcement and monitoring agencies to work more closely with Canadian financial institutions; which has enhanced the effectiveness of law enforcement's investigations pertaining to the illegal convoy protests.

The RCMP and its policing partners used the Emergency Economic Measures Order to strongly encourage individuals to leave the illegal protests and deter them from counselling others to commit criminal offences.

The RCMP provided relevant information to financial institutions, who have the onus to determine which financial products should be frozen, pertaining to entities (i.e. individuals or companies) believed to be involved in illegal acts. As previously stated, at no time did the RCMP disclose information on donors or on those who purchased merchandise.

As of February 21, 2022, the RCMP has gone back to financial institutions with some updated information about certain entities whose status may have changed pertaining to the illegal protest activity. This new information can be assessed alongside all other information to help inform decisions to unfreeze certain accounts.



DÉCLARATION

Application de la loi en vertu de la *Loi sur les mesures d'urgence* – Dégel de comptes

La *Loi sur les mesures d'urgence* a permis aux organismes d'application de la loi et de surveillance de collaborer plus étroitement avec les institutions financières canadiennes et d'ainsi accroître l'efficacité des enquêtes policières sur les manifestations illégales entourant le convoi de la liberté.

La GRC et ses partenaires policiers ont eu recours au *Décret sur les mesures économiques d'urgence* pour encourager fortement des individus à quitter les lieux des manifestations illégales et les dissuader de conseiller à d'autres personnes de commettre des infractions criminelles.

La GRC a fourni aux institutions financières, qui ont la responsabilité de déterminer quels produits financiers doivent être gelés, des renseignements pertinents au sujet d'entités (individus ou entreprises) que l'on croit participer à des actes illégaux. Comme il a été déclaré précédemment, la GRC n'a à aucun moment divulgué de renseignements sur des donateurs ou des personnes qui ont acheté des marchandises.

En date du 21 février 2022, la GRC a transmis des renseignements actualisés aux institutions financières sur certaines entités dont la situation peut avoir changé relativement aux manifestations illégales. Ces nouveaux renseignements peuvent être évalués au même titre que toutes les autres informations disponibles afin d'éclairer les décisions relatives au dégel de certains comptes.