

**Combined Notice of Application
for Leave to Appeal and Notice of Appeal**

Form 12, *Criminal Appeal Rules*, Court of Appeal for Ontario

COA-25-CR-

Court File No. (if known)

M

Motion No. (if known/applicable)

COURT OF APPEAL FOR ONTARIO

BETWEEN:

HIS MAJESTY THE KING

(Applicant/Appellant)

- and -

TAMARA LEE LICH AND CHRISTOPHER BARBER

(Respondent)

NOTICE OF APPEAL AND NOTICE OF APPLICATION FOR LEAVE TO APPEAL

APPEAL INFORMATION

1. Place of trial/proceedings below: Ottawa, Ontario Court of Justice
2. Name of judge: Justice H. E. Perkins-McVey
3. Offence/Sentence under appeal:

Offence name	Section number	Plea	Result at trial	Sentence
Counsel indictable offence – mischief	464(a)	Not guilty	Guilty	Stayed Pursuant to <i>R v Kienapple</i>
Counsel to indictable offence—intimidation	464(a)	Not guilty	Not Guilty	
Counsel indictable offence—obstruct police	464(a)	Not guilty	Not Guilty	

Obstruct Police	129(a)	Not Guilty	Not Guilty	
Intimidation—block highways	423(1)(g)	Not Guilty	Not Guilty	
Mischief	430(3)	Not Guilty	Guilty	Lich: 15.5 months conditional sentence in addition to 74 days credit for time already served Barber: 18 month conditional sentence
Counsel indictable offence – disobey court order (Barber Only)	464(a)	Not guilty	Guilty	Barber: 18 month conditional sentence, concurrent to sentence for mischief

4. Length of trial/proceedings below: 42 days
5. Date of conviction: April 3 2025
6. Date of sentence being appealed: October 7 2025
7. If in custody, place of incarceration: N/A
8. Court File No. in court(s) below (if known): 23-114011

TAKE NOTICE that the appellant/applicant

- ☒ Appeals against acquittal upon grounds involving a question of law alone.
- ☒ Applies for leave to appeal against sentence, and if leave be granted hereby appeals against sentence.

THE GROUNDS FOR GRANTING LEAVE TO APPEAL/APPEAL ARE:

1. The trial judge erred in law in her interpretation and application of the elements of the offence of intimidation in section 423(1) of the *Criminal Code*.
2. The trial judge erred in principle in her treatment of aggravating and mitigating factors on sentence.
3. The trial judge erred in principle by imposing a concurrent sentence on Christopher Barber for the offence of counsel to disobey court order.
4. The trial judge erred by imposing a sentence that is manifestly unfit.
5. Such further and other grounds as counsel may advise and this Honourable Court may permit.

THE RELIEF SOUGHT IS:

That the appeal against acquittal be allowed and a conviction be entered on the count of intimidation (s. 423(1)(g)), or alternatively that a new trial be ordered; and

That the application for leave to appeal against sentence be allowed, that the appeal against sentence be allowed, and that the sentences be increased.

THE APPELLANT/APPLICANT MAY BE SERVED WITH DOCUMENTS PERTINENT TO THIS APPEAL/APPLICATION:

1. By service in accordance with the Criminal Appeal Rules through:

Ministry of the Attorney General
Crown Law Office—Criminal

[REDACTED]

DATED at Toronto, in the province of Ontario,
this 5th day of November 2025.

Leslie Paine

**Leslie Paine, Director
Crown Law Office - Criminal**

[REDACTED]

TO: The Registrar

AND TO: Lawrence Greenspon/Eric Granger/Hannah Drennan
Counsel for Tamara Lee Lich
Greenspon Granger Hill Lawyers

[REDACTED]

AND TO: Diane Magas
Counsel for Christopher Barber
Magas Professional Law Corporation

[REDACTED]

**Form 2
BACKSHEET**

COA-25-CR-

Court File No. (if known)

M

Motion No. (if known/applicable)

COURT OF APPEAL FOR ONTARIO

HIS MAJESTY THE KING

- and -

TAMARA LEE LICH AND CHRISTOPHER BARBER

(specify name)

**NOTICE OF APPEAL AND
NOTICE OF APPLICATION FOR LEAVE TO APPEAL**

(specify title of document)

(if an affidavit, specify name of deponent and date sworn/affirmed)

Crown Law Office - Criminal

(specify name and contact information of person serving or filing the document)