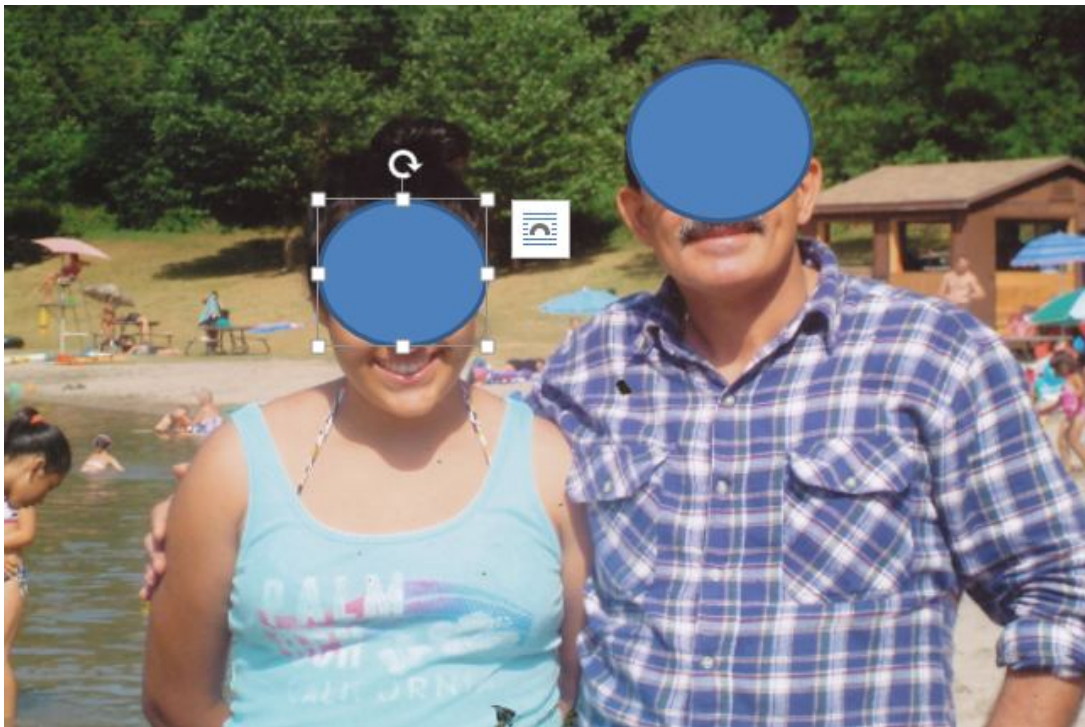


**Affidavit of XXXXXX XXXXXXXXX  
D.O.B. November 27, 1998 (Currently 16 yrs of age)**

**I the undersigned, xxxxxxxx XXXXXXXXX, swear/affirm the following statements to be true**

1. My name is XXXXXX XXXXXXXXX and I am currently living in Toronto, Ontario. My birthday is November 27, 1998 and I am 16 years of age. I do not suffer from any psychological issues which prevent me from fully understanding the contents of this sworn affidavit and the purpose of this affidavit which I have signed with my full informed consent.
2. I am the daughter of XXXXXX XXXXXXXXX and the main subject of a child protection proceeding initiated by way of Notice of Motion on October 29, 2014 by the Catholic Children's Aid Society of Toronto against my parents in court. The court file number is C48292/09. The Motion was initiated by children's aid society worker, Ms. Karen Saligman who is an unregistered worker with the children's aid society. Below is a copy of a photo of my loving father and I.



**My current circumstances**

3. The Catholic Children's Aid Society of Toronto has done so much harm to me over the past number of years. After being forced into foster care on November 19, 2014 I fled from the foster home on November 27, 2014. I am presently living with my aunt but being prevented from returning to my own home as a result of an unjust and unwarranted court Order issued

against my father by Madame Justice Roselyn Zisman on November 19, 2014.

4. I have been told that I cannot be with my father and that a restraining order has been issued against my father which prevents my loving father from going anywhere near me. This very unjust order was issued at the request of the Catholic Children's Aid Society of Toronto worker, Ms. Karen Saligman.
5. I do not wish to be in care of the Catholic Children's Aid Society and do not want workers harassing or threatening me anymore.

### **Purpose of this affidavit**

6. I am submitting this affidavit for the following purposes:
  - a) To assist in the pursuit of justice by having the unjust and unwarranted restraining order made against my father by Madame Justice Roselyn Zisman on November 19, 2014 removed so that I can return to my home and to be with my loving father.
  - b) To expose the terrible injustices committed against myself and other members of my family as a result of the gross failure of the Catholic Children's Aid Society of Toronto and the family court system as well as the Office of the Children's Lawyer.
  - c) To expose the gross injustice and the gross violation of my rights and freedoms committed against me and my loving father on Wednesday November 19, 2014 by family court judge, Madame Justice Roselyn Zisman at the Ontario Court of Justice at the family court at 47 Sheppard Ave. E. in Toronto.
  - d) To expose the horrible circumstances of how I was harassed and threatened at the courthouse at 47 Sheppard Ave. E. by CAS workers and police, and then physically arrested at the courthouse, then handcuffed, humiliated by being paraded in handcuffs in public by police and then transported against my will to a children's aid society foster home.
  - e) To have my voice heard and to be respected as a result of Madame Justice Roselyn Zisman refusing to listen to me when I was in her court on November 19, 2014 after the failure of my lawyer from Ontario's Office of the Children's lawyer to show up to court and to have my voice heard.
  - f) To bring to the attention of everyone, how I (my siblings to) have been subjected to years of physical, emotional abuse and neglect at the hands of my mother since I was a young

child. Now that I am older and can understand matters, I can now see how the gross failure of the Children's Aid Society and the Family Court System, which had for years supported my abusive mother and discredited and punished my loving father, has caused so much harm to destroy our family and to cause so much disunity.

- g) To expose the reasons why I, as a young Canadian, has lost significant respect for the justice system in Canada as a result of the failure of the Children's Aid Society and the Family Court System and to some extent police services, who collectively have caused me to be subjected to years of abuse and violated my rights and freedoms when I am not a criminal nor have committed any crime.

### **I fled the CAS foster home of my own free will**

- 7. On my 16<sup>th</sup> birthday on Thursday November 27, 2014, I walked out of the children's aid society foster home where I was being forced to stay against my will. I felt very uncomfortable, neglected and not safe in the CAS foster home from the very beginning. I was fully aware of my rights at 16 years of age to leave care and chose to exercise my rights. I left the CAS foster home of my own free will sought refuge with family where I feel safe and cared for.
- 8. I was not coerced by anyone to leave the CAS foster home. I left the foster home because I objected to my rights and freedoms being trampled upon after being physically forced by Toronto Police to go into the children's aid society foster home.

### **Use of threats, use of force and unlawful arrest by CAS workers and Toronto Police Officers at the courthouse at 47 Sheppard Ave. in Toronto**

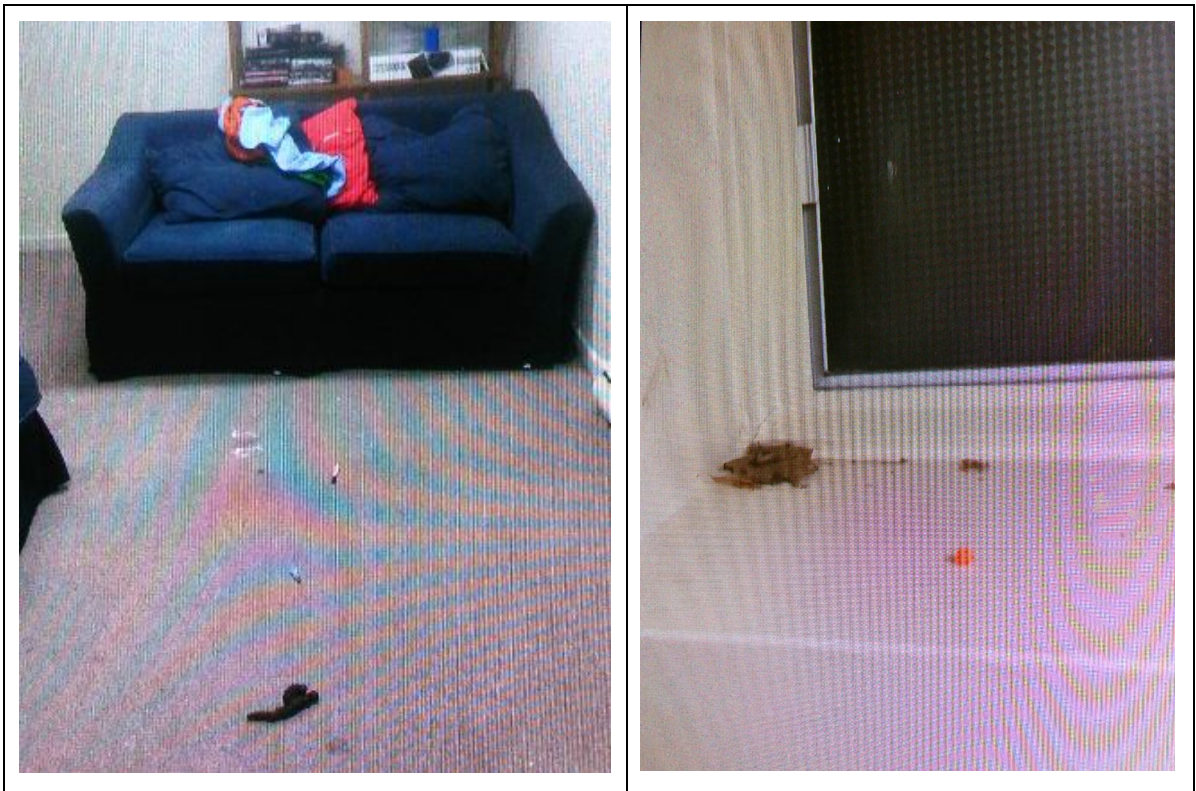
- 9. After leaving the courtroom on Wednesday November I was approached by my children's aid society worker, Karen and another CAS worker who was with Karen at the time. There were two court security officers with her. I felt ganged up on. I tried to move away but the court security officer blocked my movement and sometimes held my hand to prevent my free movement.
- 10. I tried to see my dad in the hallway of the court but I was blocked from seeing him. With CAS workers and security officers surrounding me and restricting my movement I started to cry and went to the washroom. A female officer even followed me into the washroom. After I came out of the washroom one of the officers kept telling me to "cooperate" with the CAS and that everything would be OK.

11. My CAS worker, Karen started talking to the police about my case. Karen asked me if I would come with her. I told her no. I just wanted to go back to my home. A short while later two police officers from outside the court arrived. The officers asked me if I was going to “cooperate” with the CAS and to do what I was told. I told the officers that I did not want to go with the CAS workers and that I would not go with the CAS workers. The police officers told me to stand up and then to my shock grabbed my arms and put them behind my back. It hurt my arms and shoulders. Handcuffs were put on me. The handcuffs were so tight that they hurt my wrists.
12. I was paraded in handcuffs through the court in full view of the public and put into the police car by force. Next I was driven to a CAS foster home in the west end of Toronto at 184 Geoffrey St. in Toronto near High Park. At the time nobody was home so I was left in the police car. At one point I had to go to the bathroom and to get attention of the officers I had to bang my feet on the window to get the officer’s attention as they were outside talking to the CAS worker.
13. After I got the attention of the officers, I was driven to St. Joseph Hospital to go to the bathroom. Again, I was paraded in public with handcuffs on and led into the hospital. It was extremely embarrassing to be paraded in public when I was not a criminal. Handcuffs were removed so that I could enter the washroom cubical. Both officers waited outside the washroom cubical. When I came out the handcuffs were again put back on me and I was paraded by the officers to the police cruiser with handcuffs on. We drove back to the foster home.
14. Once we arrived at the CAS foster home, I was taken inside the foster home with the handcuffs still on. Once inside the foster home the police officers told me that if I did not stay in care of the CAS then I would be hunted down and brought back. The police officers clearly were trying to scare me. The foster mother and CAS worker told me that I have better stay and do what I was told or I would be hunted down and brought back.
15. I am not a criminal but was treated by the CAS workers and the police as if I was a criminal. This whole incident involving my arrest and detention by the police was a violation to my reasonable rights and freedoms as a person and nothing but an abuse of power and a total waste of everyone’s time and resources.

### **Substandard environment at the CAS foster home**

16. I was certainly not impressed with the quality of the living conditions at the children’s aid society foster home. Some of my experiences and observations while in care of the CAS were as follows:

- a) The food was substandard compared to what I was used to eating at home with my father. Food was very poor quality and consisted of mostly canned and processed food. There was few fresh fruits and vegetables.
- b) The foster mother had a dog which sometimes growled at me and made me feel uncomfortable likely because I was a new person in the house. When I asked the foster mother to take the dog to another part of the house so that I would not be bothered, the foster mother told me that this was the dog's home. Clearly the foster mother put her pet dog above the interests of guests.
- c) The foster mother's dog was not trained and was allowed to just poop on the floor. I took a couple of photos with my cell phone and below are two photos of the dog poop in two different locations in the house. It was disgusting to see dog crap around the house. On one occasion the foster mother told me that she would pay me to clean up the dog poop. I told her no thanks.



- d) During the 8 nights which I spent in the foster home I had to wear the same clothes. The CAS workers never offered to allow me to get some of my clothes from my home nor was there any offer to get me new clothes so that I could have a change of clothes at the foster home.
- e) It was very apparent from the beginning that the foster mother really did not care about me

or about the other children in her care. In my mind the term jail guard would be more appropriate than a foster mother. . Based on the way in which I was treated it seemed that the foster mother was taking care of kids for the money. There was no love, no caring and no real attention.

17. Overall, the environment and living conditions at the CAS foster home were deplorable in my view. The foster home was not much more than a jail cell where you had a room to stay in with the foster mom being the jail guard.

### **Actions of CAS have disrupted my schooling and education**

18. When it came to my school while in foster care I was unable to attend school. I had no change of clothes nor given any fresh clothes by the CAS. I was put at the opposite side of Toronto in the CAS foster home with no transportation to school. I was not offered TTC passes to get to school. I was forced away from my school, my friends and my community and dumped into a completely strange environment and given no help or guidance by CAS workers.

### **CAS blocked my attempts to live with my dad by refusing to allow me to change schools.**

19. In an attempt to live with my father and to get out of my mother's abusive home back in September of 2014, I told the CAS workers that I wanted to live with my father and to go to the school near his home. I would have been so much happier and there would have been far less conflict between my mother and myself. The CAS workers told me that I could not change schools and refused to assist me to get permission to go to the school near my father's home.
20. I cannot understand why the CAS workers would give me such a hard time. Again, this seemed to be part of their position to support my mother and to not support me or my father.

### **Madame Justice Roselyn Zisman silenced me in her court on November 19, 2014 and in effect obstructed justice**

21. On November 19, 2014, I went to the Sheppard Ave. E. court in Toronto in response to the Notice of Motion which the Catholic Children's Aid Society had put into the court asking that I be put into the care of the CAS. I did not want to go in care of the CAS as I had a good home with my loving father and I was happy.
22. For reasons unknown to me, my lawyer from the Office of the Children's lawyer did not show up. Seeing as my lawyer was not there to speak up for me, I stood up and tried to speak to Justice Zisman. I wanted to let the judge know how the CAS was wrong and that there were a

lot of lies in their materials.

23. Instead of listening to me, Madame Justice Zisman told me to sit down and to be quiet. It was very clear that Justice Zisman did not want to hear from me yet I was the one who most knew what the truth was and knew about all the harm that the CAS had done to me over the years.
24. I strongly believe that if Madame Justice Zisman had taken a few minutes to listen to me or to ask me a few questions that she would have never written the unjust order that she did. Her Court Order stripped me from loving father, stripped me from my school and community and resulted in me being arrested, handcuffed, humiliated in public and roughed up by police.
25. In my opinion, Madame Justice Zisman should not be a judge. Her order was not just an error but based on her deliberately refusing to listen to a minor who knew more about the truth than any of the other parties before the court. Madame Justice Zisman was biased and against my father from the very beginning.
26. I went to Madame Justice Zisman's court to seek justice for myself and my family but was turned away by the judge who appeared to listen only to the children's aid society lawyers.
27. Since the court date, I read an article in which it was published that Madame Justice Zisman used to work as a lawyer for the CAS before she was a judge. If this is true, I believe it to be very wrong that Justice Zisman even acted as a judge in my family matter.

**Claims by CAS worker that my father has alienating me from my mother are completely wrong and malicious**

28. In paragraph 4 of the affidavit of Karen Saligman, she states that my father has alienated me from my mother. Nothing could be further from the truth. I left my mother's home because the environment was abusive and had been that way for as long as I could remember. My father tried to help by reporting the abuse to the CAS but it seems like the CAS workers use my father's attempt to help his children as an excuse to blame my father. Just as I am angry at the CAS workers for doing nothing to help when I reported abuse to the CAS, my father is angry and frustrated as well.
29. If anything over the years, it has been my mother who has failed to encourage a good relationship between my father and us children. My mother was the one who badmouthed my father and encouraged us not to see our father. My mother always talked about the money and how she would lose money if any of us children left her.



## **Years of failure by the Catholic Children's Aid Society of Toronto**

30. Since my mother and father separated, the Catholic Children's Aid Society has been involved with our family as a result of the abusive environment at my mother's home.
31. For all the years the CAS has been involved with our family, the CAS has done absolutely nothing to help. If anything, the involvement of the CAS has driven a wedge between my mother and father and further promoted animosity and hatred within our family.
32. For years the CAS workers have fully supported my mother and have been against my father. Yet it has been my mother who has physically and emotionally abused the children and neglected us. Yet the CAS have supported her and made it seem like she is a good mother when the opposite is true. She has physically assaulted me, my siblings and even my father when they were living together.
33. In reality it is my loving father who is the better and most caring of my two parents, yet in all these years the CAS workers have covered up the truth and condoned my mother's abusive behaviours.
34. A search of the internet shows that the Catholic Children's Aid Society has failed other children besides me by putting children back into the care of abusive parents. Below is a copy of the headlines of just one of the stories one can find on the internet about the Catholic Children's Aid Society of Toronto failing children.



35. In my opinion, the Catholic Children's Aid Society of Toronto have been the cause of abuse as a result of the CAS workers supporting my abusive mother and denying that she is an abusive mother. By supporting my abusive mother, the CAS has only encouraged her to be more abusive and a poor parent. By supporting my abusive mother, myself and my siblings have become afraid to speak out because no one from the CAS appears to be listening to our concerns about our mother. Now that I am older, I am speaking out but my brother still remains terrified to speak out.



## **My case of my father being abused by the children's aid society is not unique**

36. I conducted some research on the internet and found that I am not alone in my experience with the children's aid society. I found the affidavit of a teen who is about my age in Hamilton, Ontario who wrote an affidavit in which he described how the children's aid society in Hamilton abused him and his father in a very similar manner as is happening to my father and I. Like myself, this teen was wrongly arrested by police in an attempt to make him live with his abusive mother or be forced into foster care just like I was.



**Photo from a video taken showing two Ontario Provincial Police officers dragging a handcuffed teen away in his sock feet because the children's aid society wanted to force the teen to live with his abusive mother and not with his loving father.**

37. Like myself, this boy also reported in his affidavit how the judge in the case tried to silence him as well by not listening to the teen and ordering the police to arrest the teen. I used this boy's affidavit as a template to make up my affidavit as well.

**Attached as "Exhibit A" is a copy of the affidavit of Keeton McFadden**

## **Years of failure of my children's lawyer to represent me properly**

38. On November 19, 2014 my lawyer from the Office of the Children's lawyer did not appear in court to represent me. My lawyer did not call me to say that she would not attend court, yet this court was so important as the Catholic Children's Aid Society was asking that I be ripped from my home and placed into foster care. This is a gross failure of my children's lawyer.
39. My children's lawyer has been involved for about 5 years with me. When I was younger I really did not understand things but always questioned why the courts and the CAS kept myself and my siblings living in an abusive environment with our mother.
40. All I can say at this point in time and now that I am more mature, is that my children's lawyer

has done absolutely nothing to help me or my siblings in all those years. Our abusive mother was supported and our loving father treated as a criminal. I no longer trust the Office of the Children's Lawyer and don't wish to work with them anymore.

### **My CAS worker, Ms. Karen Seligman is not registered with the Ontario College of Social Workers**

41. In paragraph 4 of the affidavit of Karen Seligman, she makes reference to her "professional opinion", yet she provides no credentials as to her professional qualifications with her name or title in her affidavit. On page 1 of her affidavit she simply states that she "works in Toronto, Ontario". She does not even give her title at the Catholic Children's Aid Society of Toronto.
42. I have come to learn that persons engaged in the practice of social work in Ontario are supposed to be registered as members with the Ontario College of Social Work under the Social Work and Social Service Work Act (1998). I did a check on the College's website registry to see if Karen Saligman was registered. According to the College's registry as of November 29, 2014, Karen is not registered as a professional with the College of Social Workers. Below are two screen shots from the College's registry after I conducted a search of Ms. Saligman's name.

**Ontario College of Social Workers and Social Service Workers**  
PROFESSIONAL, ETHICAL, QUALIFIED, ACCOUNTABLE

**REGISTER**  
**Member Search**

Enter the following information to search for a registered member:

Registration No.

First Name

Last Name

Previous Name

**SEARCH**

**How to Find a Member**

Choose any of the two options:

1. By **Registration Number**: Enter the 6-digit Registration Number.
2. By **Name**: Enter either:
  - **First AND Last Name**
  - **First OR Last Name**
  - **Previous Name**

A minimum of 2 characters is required for a name search.



### **I believe that my mother suffers from mental conditions which are responsible for her abusive behaviours**

43. It is a tragedy that my mother's abusive behaviours have caused so much damage within our family. Now that I am older and can better understand the issues and their causes, I do believe that my mother suffers from some sort of mental illness which causes her to be abusive and physically violent at times. Even though she does not work and does not have the pressures of work to deal with, she is seldom a good natured mother. I have never seen her to be a responsible mother.
44. While I will always recognize and respect that my mother will be my mother, I have come to the realization that not all parents are good parents and that some parents want to cast blame on others as does my mother. This is a reality of the imperfect world we live in. At 16 years of age, it is in my best interest and my mother's best interest that we do not live in the same home as I fully recognize what abuse is and do not want to be exposed to it on a regular basis.

### **My mother encourages hatred by my sister towards me**

45. My mother had created an environment where my own older sister Xxxxxx abuses me. My mother speaks badly about me to my older sister. This is one of the reasons why my sister assaulted me and broke one of my teeth while my mother stood by and watched. My older sister has even blocked me from her facebook page.
46. My mother has created an environment where my older sister is allowed to smoke marijuana and do almost anything she wants. Setting no limits on my older sister is how my mother gets my sister to be on her side and to be against me. I don't support my mother's parenting choices

and want out of the home to be with my father where I feel safe and better cared for. My mother is treating me like a traitor just because I want to live with my father and is encouraging my older sister to hate me as well.

### **My mother's poor parenting encourages my brother to skip school**

47. My brother misses a lot of school as outlined in Exhibit E of the affidavit of CAS worker Karen Seligman. Many of the illnesses on the school record are excuses for my brother being too tired to get up in the morning and to go to school.
48. My mother has bought my brother a large flat screen TV for his room, a video game system and a cell phone. My mother leaves my brother alone in his room for hours on end to do whatever he wants to do. My mother puts no limitations on him so as a result he often stays up until late at night playing video games and talking to his friends on the phone. My mother is being irresponsible and as a result of her poor parenting, my brother is often too tired in the morning to go to school. She does not push him to go to school. She does not make him do his homework. My brother is not doing as well as he should a result of my mother's poor parenting.
49. In addition, my brother is not a healthy weight. My mother does not feed him very well and does not cook nutritious meals. I sometimes throw out expired food which my mother has in her home because I don't believe that my mother should be feeding us children with old and outdated food products. Below is a photo of my brother with my father.



50. I believe that my brother is overweight because my mother does not practice healthy eating habits and does not encourage my brother to be physically active. My brother spends most of his time in his room watching TV and playing computer games. I feel sad about my brother being turned into what people call a couch potato. I love my brother and just want him to be healthy.

### **My mother encourages my sister's illegal use of marijuana**

51. My 18-year-old sister Xxxxxx smokes marijuana. I have seen a photo of my sister with a marijuana cigarette in her hand. While that may be my sisters poor choice, what bothers me is that my mother indirectly encourages my older sister to abuse drugs by giving her money which my sister in turn uses to buy her marijuana.

52. My mother is aware of the drugs but just as she does with my brother, allows my sister to do whatever she wants. My mother does nothing to discourage my sister using drugs. My mother is setting a poor example as a parent which ultimately will not be good for my sister.

### **My mother's claim that I am psychologically delayed are false and I believe motivated to obtain additional money from the government**

53. A number of years ago, my mother had me diagnosed by some doctor as being psychologically delayed. I did not understand at the time what was going on but now I believe that my mother did this in order to obtain additional money to add to the money she gets from the government because she does not work. Many times my mother has become angry about me moving out and as made reference that she will lose the money she gets for me. I believe that she is angry for me moving out to live with my father because of the money she will no longer obtain for me from the government.

54. I believe that my mother is also trying to get my brother diagnosed for the same condition. I believe that my mother she is doing this for monetary reasons as well.

55. I verily believe that my mother is using the system to get as much money as she can from the government and wants to maintain control of me in her home so that she will continue to receive the money for me. This is not right. What my mother is doing is cheating the system. She is not setting a good example for us children.

56. I do not believe that I am mentally delayed and would like to have myself cleared of this false impairment as I do not want this false diagnosis to affect my future as I begin my own life away

from my mother's control.

### **My relationship with my mother will improve over time**

57. I do believe that living with my father at this stage in my life will help in the rebuilding of a better relationship with my mother. The environment at my mother's home has become too hostile and intolerable for me to live there anymore.
58. Not living in my mother's home I feel will reduce conflict and hopefully allow my mother and I do build some sort of mature relationship over time. Once my mother sees that she can no longer control and abuse me and have the children's aid society workers support her abuse, then she might become less hostile towards me. Why the children's aid society workers could not see this simple solution is almost beyond belief. The children's aid society workers are supposed to be professional yet they seem so incompetent.
59. What I find disturbing is that the children's aid society workers have failed in all these years to properly assess the problem with my mother's bad parenting and mental health and have discounted what us children were saying and supported my mother's abusive behaviours while blaming all of the problems at my mother's home on my father. The actions of the children's aid society workers have been so wrong, almost criminal in my mind.

### **Summary**

60. At this point in time, I just want my informed and well thought out choice to live with my loving father respected, to be allowed to visit my mother and my siblings whenever I decide is reasonable and to have the children's aid society stop harassing me and interfering with my relationship with my parents and family. I want to get back to school and to get back to a normal life without the CAS harassing me.
61. I am not at any risk as the unregistered CAS worker, Ms. Karen Saligman claims in paragraph 4 of her affidavit dated October 29, 2014. I feel that the actions of the children's aid society workers to date have caused nothing but hardship and conflict for our entire family and allowed my mother's abuse to continue.
62. I don't mind speaking with the CAS workers if they have reasonable questions but I don't want them bossing me around and telling me where I should live and what I must do with my life. I want the CAS workers to listen to me, not ignore me as has been the case up until now. What I do with my life is my choice, not the choice of any CAS worker, especially an unregistered

CAS worker as is my current worker. I am old and mature enough to take responsibility for my own decisions. I do not want to be treated like a helpless child who is unable to know what is in my best interests as the CAS workers seem to think. The CAS and its workers, especially my worker, Ms. Karen Saligman should just leave me alone and stop bullying me and my family!

63. The people I am most disappointed in are the CAS workers, the police and the family court system. I feel let down by the courts. I am not afraid of my parents and fully capable of handling any issue affecting me which involves my parents contrary to what my CAS worker claims. As a young Canadian I should not have to live in fear of police and CAS workers who claim to be protecting children yet from my own experience seem to do the opposite by bullying and controlling them.
64. Those workers at the CAS who claim to be professionals and claim to help children and families should better listen to what kids have to say and to stop harassing us and to stop intruding into our lives. If anything, the CAS workers, the lawyers and the police they have only made matters worse, not better for me and my family. I do not trust the CAS and my respect for police is greatly diminished for not protecting my rights and freedoms and for bullying me on behalf of the CAS workers.
65. I am willing to speak in person to any judge who wishes to speak to me in regards to the statements I have outlined in this affidavit. I only want justice for myself and my family which sadly the children's aid society workers have failed to provide my family up until now.

*Put a line through any blank space on this page.*

Sworn/Affirmed before me at:

Toronto

*(municipality)*

In Province of Ontario

*(province, state or country)*

on December 1, 2014

*(date)*

*Barrister/Solicitor or  
Commissioner of Oaths*

*Signature*

Armenia Miekhil Mouradian (647) 232-7678  
*(This form to be signed in front of a lawyer, justice of the peace, notary public or commissioner for taking affidavits.)*



THIS IS  
**EXHIBIT**  
**“A”**

Referred to in the affidavit of

**XXXXXXXX XXXXXXXX**

Sworn before me  
THIS 1<sup>st</sup>. DAY OF December, 2014

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A COMMISSIONER, ETC.