

Court File No. CV-22-00089835

**Ontario
Superior Court of Justice**

B E T W E E N:

The Kingdom of Heaven Found a Sean
(An Express Trust Organization)

Claimant/Plaintiff

- and -

Tanja Johnson, Hala Tabl and Michael von Dehn

Respondents/Defendants

MOTION FACTUM OF RESPONDING PARTY and TRUSTEE

for:

The Kingdom of Heaven Found a Sean

(Rule 21 Motion Opposition, Returnable
November 8, 2022)

September 20th, 2022

The Kingdom of Heaven Found a Sean
105-320 Via Chianti Grove,
Nepean, Ontario,
K2P6J6

King Sean, House von Dehn,
Hand of Stephen,
Kingdom of God
Trustee/Executor
gnosticwisdom37@gmail.com

To:

ROSEN SACK LLP
Barristers and Solicitors
2 St. Claire Avenue West, Suite 500
Toronto, Ontario,
M4V 1L5

Jenny Bogod (LSO No. 68351U)

Tel: 416-214-1200 Ext. 33

Fax: 416-915-5709

Email: jbogod@rosensack.com

Lawyers for the Moving Party/Defendant, Hala
Tabl

And to:

Milton's Estates Law

200-15 Fitzgerald Road

Ottawa, Ontario,

K2H 9G1

Neil Milton (LSO No. 33823T)

Tel: 613-567-7824 Ext. 224

Fax: 1-866-397-9227

Email: nmilton@miltonsip.com

Lawyer for the Defendant, Tanja Johnson

And to:

Miller Thomson LLP

100 Stone Road West, Suite 301

Guelph, Ontario,

N1G 5L3

Christopher Crisman-Cox, LSO #73671W

ccrismancox@millerthomson.com

Tel: 519-780-3122

Lawyer for the Defendant, Michael von Dehn

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Affidavit

Declare a Sean of the Facts in Response to Rule 21 Motion

Preamble

I, King Sean, House von Dehn, Hand of Stephen, Kingdom of God, Trustee and Executor of The Kingdom of Heaven Found a Sean, do hereby Swear before opposing counsel and all other People Present to hear or read these Words that I, Sean, make Oath under penalty of perjury and Say that this Declare a Sean is the Truth, the whole Truth, and nothing but the Truth regarding this Claim, so *help Me God!!!* And the Truth is:

When a Man goes by 'King Sean, House von Dehn, Hand of Stephen, Kingdom of God', it is reasonably safe to say that a percentage of People are most certainly going to be thing King he is crazy, so it is not uncommon for People to underestimate Me. However, I'm not generally accustomed to People Gifting Me with Presents as great as this one!

The Motion Record was Truly a Gift from God. This Declaration of Facts Will be the *only* facts that Sean Presents to this Honourable Court because Hala Tabl's lawyer has been kind enough to provide Sean with all the information necessary to dismiss this Motion and hear this Claim.

Perhaps the first thing the Judge reading these Motion materials should know for the Record, is that virtually everything in the Statements of Defense offered by the Defendants, is ***news to Sean!*** This is *why* Sean is so floored by both the Statements of Defense (by all parties) and the Motion to dismiss.

As something of both a Preamble and a Disclaimer, I either dispute, or have no knowledge of any of the claims made in any of the Defendants SoD other than those agreed by all parties or directly addressed in this Declaration, and am as King of these Honourable Courts to hold the Defendants accountable to the strictest proof of *evidence* thereof.

Sean's Wish is for these Honourable Courts to know that he did spend careful time considering how he should compose these Motion materials in opposition of the Rule 21 Motion. The amount of information that Sean discovered for the first time is so overwhelming, it *is* a tort and cause of action, in and of itself!

Sean concluded that the best Way to address this is by Way of this Declaration, which is something of a journal for Sean as he sorts through all of these details and tries to put all of the pieces together. The first thing I would like to draw the Court's attention to before telling the Story, is that *every single Defendant* is attacking *Sean's Character* (ad hominem) at some or several points in their SoD and the Motion to Dismiss.

The Claim only tells the Story, Sean is not attacking any One's Character with baseless allegations, yet *he's* the One being called frivolous and vexatious! Wait until You hear the Story and consider that each of the Defendants *likely* know every detail these Honourable Courts Will hear, yet tell the Story *shamelessly!*

Reply to Michael von Dehn's Statement of Defense

To start, We Will address each of the Defendant's SoD's, beginning with Mr. Crisman-Cox regarding a few Statements made in his SoD for Michael von Dehn:

Christopher Crisman-Cox states in his SoD (6), that Sean has a 'delusional and incoherent conception as to the nature of Ontario's legal system'. Sean believes he has a *right* to participate in any judicial proceeding where he has a financial interest, and to be *fully informed* of all Applications and Directions *at least ten days before any hearing* (RCP, 75.06(2)). Christopher Crisman-Cox believes that complaining of trespass upon Sean's Wish to participate in his father's Estate proceedings, to *not* be informed of determinations being made against him, and to be denied the *Right* to Honour his Father as he had Promised, and to protect the Estate assets for its intended Beneficiaries is *frivolous and vexatious*? I Trust these Honourable Courts Will disagree with Christopher on this point.

Christopher Crisman-Cox seems to have something of a delusional and incoherent conception as to the nature of Ontario's legal system because he

seems to believe that *hearsay* is permissible on this Honourable Court of Record where facts entered onto it are presumed to be *Sworn* under penalty of perjury. Christopher says that Sean's father did not Promise him that if he left no legal Will that he is to inherit his father's land (14)? *Really?* Sean has a Testamentary Instrument that says otherwise - the same one Your client withheld from the Court so that Sean could not Present it to support his position for appointment of CAET. Sean holds Chris to the strictest proof thereof regarding this statement, and Will be as King for this Honourable Court to Order Chris to amend his Claim if he cannot prove it to be True. He Will *not* call Sean a liar on a Court of Record without proof, and he Will NOT insult his Word with such libelous statements, *especially* regarding some of the last Sacred Words that were said to Sean by his late Father. Hearsay is *not* permissible on a Court of Record and must accordingly be struck from his SoD!!!

In paragraphs 29-31, Christopher Crisman-Cox concedes that Michael found the last Letter Sean had Writ his late Father on the property at 1070 Hewitt St. He states that Michael returned the Letter to Sean upon request. What he *doesn't* mention, is that Michael did not tell Sean about the Testamentary Instrument until *after* he withdrew his consent to Tanja's application - a consent form to a CAET application that was as King to have Sean denied his right to participate in the proceedings, denied his right to make his own application for a CAET, and *to pay the legal costs for Tanja and Michael's proceedings from Sean's share of the Estate!!!* (I told You it would be a Good Story). It's almost inconceivable that some One would be bold enough to be as King of a Court for that. But that's what Tanja Johnson did to Sean, and what Michael *consented* (italics because We're coming back to this soon) to - including an affidavit Sworn by Tanja Johnson defaming Sean's Character and his Blog, www.vondehnvisuals.com. Every Man has equal right of the protection of the Law in Canada, and to fairly participate in the judicial process. Trespassing upon a Man's right to participate in a judicial proceeding is interfering with Justice, which is *in fact*, a criminal offense . To do so intentionally, is to do so 'Mens Rae', or 'with guilty Mind'. I believe that Willful intent to exclude an individual from a large Estate hearing qualifies as judicial interference (Canada's Criminal Code, 139(2).) Consent to an application is an endorsement and makes Michael a conspirator to the intent of the applicant (Tanja). Sean only learned about the letter *six months* after Michael had found it, and *after* Michael withdrew his consent to Tanja's application. Sean was immediately as King for the Testamentary Instrument to

be returned to him, Michael refused and told Sean he was Keeping it 'for now' but Promised to destroy the Letter if Sean attempted to file a CAET application with the Court for him Self. Sean waited two more years before as King about the Letter again, at which time Michael did return the Testamentary Instrument on Demand. Even if Michael did not believe it was a legal Testamentary Instrument, he certainly knew it was at least contentious and *relevant* to the Court application - he withheld critical information from the Court with intent. Again, a criminal offense in Canada, interfering with justice by Way of Willful concealment of evidence (fraud).

With respect to his father's ashes (31-37), Sean didn't say anything at the time because he was too shocked. At this point Sean still thought everything with the Estate was going fine because that's all he'd been told, and he really wasn't being told much. Michael was discussing everything with Sean, Tanja wasn't even involved and wanted nothing to do with it (at least as far as Sean knew). Michael had said that Sean, Tiffany (a girl friend of Sean's father) and Michael were the only ones interested in having a little ceremony to Celebrate Joachim's Life. The next Sean heard about it, it was already done. This wasn't the *end* of the harm or the last tort, this was the beginning of Michael and Tanja's campaign against Sean, and the beginning of the harm that was done to Joachim von Dehn's Estate and their (Sean, Tanja and Michael's) shared inheritance.

39 of Mr. Crisman-Cox's SoD is also worthy of mention, "but following pressure from Sean, he withdrew his consent...". This is the same application where Tanja (allegedly) commit fraud by failing to tell Michael that she intended to have Sean excluded from the proceedings, denied his own right to make an application, and to pay Tanja's legal costs from his share of the Estate to be excluded, and Swore an Affidavit making false allegations against him with intent to defame his Character and influence Justice. So please, assure Michael von Dehn that Sean is not pressuring him in any Way, he is free to consent to Tanja's application, and Sean did not know that Michael withdrew his consent 'under duress'. Sean has told Michael that no consent or contract made under duress is legally binding, so We Will change that on the Court of Record for him and clarify that he supports Tanja's application for Sean to be excluded from his father's Estate proceedings, and to pay the costs. This is duly Noted on the Court of Record and Sean thanks Christopher for clarification on this point.

In 42, Christopher is as King on behalf of Michael, to have Sean pay for Michael's legal fees for having to bring him into Court *out of his share of the Estate* (You'll Notice a trend with this line) to receive the disclosure regarding his father's Estate that he was rightfully entitled to from day one?! No opposing counsel to this Claim is going to be threatening to do any more economic harm to Sean's inheritance than what has already been done. Sean von Dehn (the artificial legal person Created in the likeness of Sean's Sacred Calling) is a Beneficiary of The Kingdom of Heaven Found a Sean, and his share of the Estate is *not* accountable. You may bill The Kingdom of Heaven Found a Sean directly and King Sean, House von Dehn Will be happy to accept Your firm's debts for Honour at face Value to offset for discharge against the real wealth of the Trust. Tanja Johnson and Michael von Dehn are also Beneficiaries of the Trust, and The Kingdom of Heaven Found a Sean recognizes each of their right to the best legal protect-Sean money can buy as a Trust obligation if they are not able to pay the legal fees their Self. Just be as King a little more kindly next time, Chris. You don't need a Court Order if You are hard up for promises to pay.

Reply to Tanja Johnson's Statement of Defense

Now, We don't really know for sure how involved each of these Characters are yet, but I do believe Michael is *least* liable (if there is such a thing when all are conspiring together) and the intent is to build momentum as we continue war King Our Way toward the climax of this Story. Next up We have the SoD and background regarding Defendant Tanja Johnson, Presented by Niel Milton:

One of the first things this Honourable Court should know is that Tanja resents and despises her father. This is not hearsay, this is well known by both Sean and Michael who were specifically asked to keep Tanja's life private from her father perhaps as long as twenty or more years ago, and they Honoured that Promise. Jochim would have no Idea who Tanja 'Johnson' is today because he was not invited to her wedding, a day Sean's father described to Sean as 'the most bittersweet Honour a father has, is to *Give his daughter away*'. Tanja married into another 'House' or family which changes a person's legal status. In fact, I can't believe I have to explain this to three *lawyers*, but it's a reasonably self

evident fact that if One were to be as King of Tanja who her father 'in Law' is, what would the answer be? Not Joachim von Dehn. No One compelled Tanja to marry into another family or change her name. If she'd kept the von Dehn family name, or were still unmarried, she would have a [legitimate] *legal* Claim upon the Estate as a representative of Our House. But she is NOT - and Sean stands on this.

It is also well known that Tanja harbours serious resentment toward her older Brother, Sean. Some years ago she requested for Michael and their mother, Catherine, to Keep her Life Secret from Sean. Sean had not spoken to Tanja in over seven years before the Estate Matter, and had no knowledge of his niece for at least two years. No One has any Idea why Tanja did this, including their mother who eventually told Sean about his niece because she was too overwhelmed with guilt for lying to Sean about why she was canceling plans because she had said she was 'sick' when she was really just babysitting her granddaughter. Sean didn't get angry, vexatious, or express any hostility toward Tanja at all - he congratulated her when he heard the news (by Way of email), and never received so much as a thank You or explanation.

Somewhere along the Way, Michael and Tanja decided that Tanja was ultimately the best choice to Act as the Estate Trustee for Joachim von Dehn to protect his assets for the entitled Beneficiaries. Sean said no because it seems as though Tanja has Issues with Sean, so Sean can't *Trust* her. It's really that simple - except Tanja and Michael think it's perfectly okay to harass, intimidate, withhold information from, and bully Sean if he doesn't do what 'the responsible ones' believe Sean should do.

And this is really the 'crux' of the Estate default. It's amazing how quickly Tanja and Michael will both claim they were not the mortgage borrowers, and so they had no obligation or responsibility to pay the mortgage or care for the Estate, they were 'just Beneficiaries'. Well, Beneficiaries are 'holders in due course', the True owners of the property. They have both said in their SoD that they had no obligation or responsibility to take care of the property and prevent unnecessary economic harm from becoming it, but they Wish to have the responsibility of dishing out the remainder plundered from the Estate after the damage has been done and accept zero accountability? They told Sean to stop harassing them for as King for disclosure, Tanja and Michael are 'taking care of things'. Sean told

them that if they didn't take care of things, a CAET would be required because creditors would bring a Claim against the Estate, at which point *the Court* Will require them to have some One appointed - then the Court Will require Sean's consent and they Will be required to provide Sean with the disclosure he is Entitled to. They ignored Sean until they required his consent for a CAET application, but they continued to withhold disclosure.

Sean was as King why the CAET was necessary if they had taken care of all the creditors and none of the accounts had defaulted. Michael *Promised* Sean it was 'nothing like that', all the accounts are in Good standing, they just need the CAET for taxes, and to sell the House. They had already shut Sean out of the Estate and all financial details regarding it because Sean had no automobile and could not travel to the property. Sean was compelled to Trust his brother and sister. The Issue each of the Defendants repeatedly mention about Sean claiming to hold the Supreme Claim of right has nothing to do with Sean claiming to have the *exclusive* right. Supreme is highest, not exclusive.

It is the prior right to Act as Estate Trustee that was denied to Sean. Sean was the only one of the three who had Promised his father he would take care of the creditors. He had also repeatedly asked Michael to forward any bills to Sean if they could not pay them so that Sean could make payment arrangements to avert default. This was a solemn Oath Sean made to his father, regardless how they might be getting along at the time of his death. It is a *Duty of Honour* (and burden) of the eldest Son in the Germanic, von Dehn family tradition. All three children had long since agreed to split the Estate evenly *long before a CAET was even required*. Sean had Given his Promise to divide the Estate evenly in Writing on several occasions just as security for Tanja and Michael in the event Sean was awarded the CAET. Every defendant is 'gaslighting' with intent to paint a picture of Sean's Character that is contrary to the Truth. They all KNOW Sean has promised to be fair with the Estate assets on several occasions, and Sean takes his Word very seriously - that's why it gets a capital, to emphasize its importance to the True Purpose of Sean's Life. Sean is a Man of his Word. Sean made a Promise to his father that his brother and sister have trespassed upon with Wilful intent - Sean intends to Keep his Promise to his father, despite their efforts.

In paragraphs 13-17, Neil discussed the Succession Reform ACT. No code, statute or ACT has the force of law to trespass upon a right or fiduciary obligation, lest the fiduciary obligation it Self is immoral, unethical, or otherwise unlawful. The Act cited also supports Sean's arguments. The Order of Succession dictates that the *next of kin* is the rightful heir; the next of kin are the children, Sean, Tanja and Michael - in that *Order of Succession*.

Prior, Supreme right to Act as the Estate Trustee is all Sean has ever claimed to have, and that Tanja Johnson *was* an heir to the Estate until she stole away to another House without her father's Blessing. Sean doesn't care what Tanja *thinks*, she is *not* a child anymore; she made a grown up decision that is legally binding and has an impact on her status and claim of right upon her previous father's Estate. Tanja is the *legal and Lawful* daughter of Mr. Johnson, her husband's father. She has abdicated her right of lineage [a Hold] on the House von Dehn Aristocracy.

That is notwithstanding that Sean long ago agreed to Give Tanja a one third share to Keep peace with his brother, Michael, who feels Tanja should receive a share anyway. The shares of the Estate are not a point of contention. All children have an equal INTEREST in the Estate (though Tanja's is contentious because of My arguments), which is not the same as Supreme right upon the Estate to Act as the Trustee. Sean is *next of kin in Order of Succession*, according to the Reform Act Neil cites in his SoD, supporting The Kingdom of Heaven Found a Sean's Principles and philosophies on the right of inheritance.

Paragraph 23 is where Neil starts informing on his firm's lawyer and co-defendant, Hala Tabl. After stating that Tanja had no duty or obligation to secure estate assets and is not responsible for the mortgage going into default (taking after her younger brother), he narrates that the mortgage ultimately went into default as a result of their negligence, and there are now \$306,100.00 in remainder assets available for the Beneficiaries as soon as a CAET is awarded to Tanja by the Court. I find it interesting that Justice Casullo considers \$306,100.00 to be such 'a small amount' for an Estate application when the maximum value for a small Estate application is \$150,000. \$306,100.00 is roughly twice as much as the permitted value for a small Estate application, why would Justice Casullo say it was so small? Of course, Niel Milton of Milton's Estates Law, the firm hired by My sister and Hala's current employer, Will be

supporting Tanja's allegations because they are co-conspirators to Hala Tabl's fraud and just as invested in maintaining her reputation for their firm.

Sean Will touch on 29 just to point out the *language* Neil uses to describe Sean's decline to consent. "Sean **refused** to provide his consent on the form **required** by the **Rules**". Neil is trying to frame his argument as though Sean is disagreeable and that he had some kind of *obligation* to consent to Tanja's application. This is violent language for a lawyer because it is designed to intimidate which is a form of coercion, and consent is not even legally binding if One is coerced or intimidated. Keep in Mind, Hala is refusing to show Sean the application she is as King of Sean to consent to! But THIS is what they mean when they say that Sean is 'frivolous and vexatious'. Refusing to consent is considered frivolous and vexatious behaviour as far as the defendants are concerned, and this is *exactly* the kind of tone, bullying, and psychological manipulation Sean has been subject to by their firm's representative, Hala Tabl for Tanja Johnson.

Paragraph 30 is also fraud by Way of Willfully miscommunicating information with intent to influence Justice. Neil says that Estate applications in Ontario may proceed with the consent of the majority parties - this is not True. Only small Estate applications and UNCONTENTIOUS proceedings can proceed without unanimous consent of the Beneficiaries; otherwise there must be a hearing. Tanja asked Hala to file the Estate application as an uncontested application valued at under \$150,000.00 when they knew the real value to be worth considerably more. The intent was that there is less oversight and they wouldn't have to tell Sean what they were doing.

In line 32, Neil informs on Hala again by stating that she tried to make the application for Tanja but required Sean's consent to dispense with the Bond. This is Hala's first meeting with someone regarding a Matter before the Court without the prior consent and approval of Sean, and in violation of Rule 1.09. The Courts were not having it, and required Sean's consent. To get around Sean's consent, in addition to lying about the application being a small Estate and uncontentious, filing under 74 instead of 75 of the Rules, Hala now hopes that by making an 'URGENT' application, they Will overlook this requirement also.

With an 'Urgent' application hearing made in violation of Rule 1.09 (count two now), Hala obtains another private meeting with a Justice, and this time it is the Honourable Justice, Susan J. Woodley.

34 is misleading. Sean did NOT make an objection to the application at the Courthouse in Ottawa because the objection was returned to him. No objection was filed with the Court in Ottawa because *it could not be accepted!* (*Wait until You find out why!*)

35 is golden! Neil states that Tanja's lawyer, Hala "***notified the Courthouse in Bracebridge of Sean's objection to the first application immediately after being made aware of it***". Really? How nice of her - it would have been nicer if she'd let Sean know because Sean had no Idea Hala was making his objections to the Court *for* him! Sean didn't know that lawyers do that, he usually likes to express his objections to the Court him Self. And didn't Jenny Bogod state that Hala never Acted for the plaintiff at any time or in any Way? Let's just jump ahead to paragraph 15 of Hala's SoD for a brief quote, "***Tabl did not act for the Plaintiff at any time and did not owe the Plaintiff any duty of care, contractual duty, fiduciary duty, or any other duty, whether as pleaded or otherwise, and puts the Plaintiff to the strict proof thereof.***" - Keep on as King and You Will receive. Consider Your Wish Granted, counselor Bogod.

In paragraph 38, Neil states that Tanja refiled the first application June 12th. It is important for these Honourable Courts to know that Sean received no Notice of this second filing of the First Application, or its hearing date. Sean discovered this information in the SoD! Sean is entitled to receive Notice of all applications made to the Court, and to be Given at least ten days notice before the direction or application hearing. These are breaches of Hala's duty to the Court, which is to Play by the Rules. It is also a violation of the Rule of Law, as all parties to any Matter where there is an interest in the outcome of the proceeding Shall/must be invited to participate under the Rule of Law. This Law is supported in Canada, and by the Rules of Civil Procedure governing Estate applications, under Rule 75. This is why Hala is guilty of breach of public Trust, and must post a performance bond as licensed lawyers are required to be insured to compel performance to the public in accordance with the Rules of the Court and the Rule of Law. When they are served with a Notice of Claim for Breach (May 29th, 2022) of that obligation, they are obliged to notify their insurer of the Claim. I am

as King of this Court to compel Hala to post her performance bond to these Courts, and to the Law Society of Ontario.

39 states that Sean did not file an objection, while he states previously that Hala had made an objection to the Courthouse for Sean without his knowledge or consent. Sean has no idea what objections Hala presented to the Court (if any), and Jenny is correct, she has no business speaking for Sean before a Court without his knowledge, it's a violation of Rule 1.09. Hala's duty is to *respond* to the objection to let Sean know how she intends to counter his objection when he does file it with the Court. That is *civil* procedure, Hala's procedure is hostile and offensive.

After stating that Sean did *not* file an objection, Neil states in 40 that, 'Michael subsequently rescinded his consent..'. So Michael withdrew his consent because Sean *didn't* file an objection? It doesn't even make sense. He doesn't say why Michael withdrew his consent, or mention that his consent was obtained by coercion and that Tanja added things to the application that Michael would have objected to had he known. But they don't mention that Tanja Johnson's first application was a document of fraud with consent obtained under coercion, intimidation, and false pretenses, as King of the Court to deny her older brother, Sean, his right to participate in the proceedings, and for all costs to be paid from Sean's share of the Estate! (What a Benevolent Trustee).

Now We get to the 'Second Application' - this is where the *real* fraud starts!
"Through her counsel, Tanja asked each of Michael and Sean to consent to the Second Application."

Neil doesn't mention that the consent was requested without a copy of the 'Second Application' so that Sean and Michael could see the application and know what they are consenting to. Sean and Michael were never Given Notice of the Application after it was filed with the Court. 44 states that Michael consented to the Application and the Application was filed with the Court (without Sean's consent or knowledge).

46 is the biggest lie of them all. "The Second Application was ***prepared and filed electronically*** with the Court in Bracebridge on behalf of Tanja by her solicitor Hala Tabl on March 24, 2022.". Unfortunately, this is something Sean

Will have to be as King of the Court about because he really doesn't know *what* is going on with this Estate filing. This is exactly what Hala told Sean she did, but when he requested a receipt of the filing from the Bracebridge Courthouse, they initially failed to respond. When Sean followed up as King about this alleged filing, they said they were backed up on Estates and hadn't had a chance to enter the Estate into the system yet, to check back in a couple of weeks. It's been almost three years, and there is still no Court of Record for this Estate 'in the system'. In fact, this [wonderful] information provided to Sean in the SoD has been reported to the Attorney General and Minister of Justice, who are now following up with the Bracebridge Courthouse to find out why these documents are not on the public record yet. This is also why Sean has been unable to respond to anything Hala Tabl has filed with the Court - no other Courthouse in Ontario has any information about this Estate whatsoever. The Ottawa Courthouse has confirmed that the document served upon Me was not filed with the Court because the Court would Sign the document and Write the CV number on it. 'You should be as King for a copy of the application filed with the Court', was the direction Sean received from the Ottawa Courthouse after showing them the documents he was sent by Hala Tabl. And how does one file a document with the Court and get it Endorsed the same day? Sean was served with the old Endorsement from the previously withdrawn application, with a *new application* (the Second Application) placing the Value of the Estate at double what it was previously, no Court filing number on it, and an irrelevant Endorsement, telling Sean the Second Application was *already* Endorsed! We know the Letter served upon Sean wasn't seen by Casullo until May6th - that is FRAUD, and Sean knows that's a big charge, and he says this on a Court of Record under penalty of perjury.

47 is great, too! "In a cover letter ***that accompanied the filing of the Second Application***, Ms. Tabl indicated that Tanja took the position that the Endorsement applied to the Second Application."

There are a couple of problems here. Would the Endorsement apply if the Second Application were not *exactly* the same as the first? Please follow along with Sean here because he's going to presume a Judge is smarter than he is, and I do need help piecing this together.

The amount of the Application Sean was served with that was clearly NOT filed with the Court, was for almost \$350k, not \$306,100, and certainly not \$150k as stated in the first application. Why would it be made under Rule 74 if it is a contentious proceeding and valued over \$150k? And why would Justice Casullo be commenting on how small the Estate Value is when dispensing of the requirement for a bond if the Value is in fact more than double that of the first Endorsement and maximum amount of an Estate under Rule 74 as indicated in the Letter?

So Sean is as King of this Court, which is True? Was the Second Application served and filed on Sean **electronically March 24th, 2022**, or was the Second Application actually filed on **April 7th, 2022**? The referenced letter that allegedly 'accompanied the filing of the Second Application' is dated April 7th. See, it gets hard to cover One's tracks when One has such a long trail to backtrack. Fraud exposed, officially. Which is True, Neil, what DID Hala serve to the Court, and when? Sean thought it was done 'electronically' on March 24th? Every document filed electronically provides a receipt through the online portal which Hala and the Bracebridge Court have refused to produce. Estate filings that include payments cannot be made electronically by email, at least according to the direction Sean has been provided with by the Ottawa Courthouse. How did Hala make the payment for the Second Application, and where is the receipt for it? What Sean finds *really* interesting, is that it was sometime around April 7th when Sean told Hala he was filing a complaint with the Law Society if Hala continued to refuse to produce a receipt of filing or an application with a CV number. Probably just a coincidence, though.

In 48, Neil is attempting to explain why the Value of the Estate in the Application served upon Sean was showing a Value of almost \$350k when the Real Value is only \$306,100k. Neither One qualifies as a small, uncontentious estate proceeding under Rule 74. What they *actually* did was refiled the First Application as the Second Application, which Sean Will now Call the 'Fraudulent Application'. The alleged Second Application is the First Application refiled, with a letter to explain why it has taken so long to proceed, and saying God knows what about Sean. It's clear on its face by the CV number assigned to it. They don't Issue CV number 20 for a 22 application unless the first application was never withdrawn and or it was refiled with the Court. The CV number must match the date of the Application, even Sean knows this! Either the First

Application was never withdrawn (fraud) and the Letter was submitted to support the previous application, or the application was withdrawn (as stated in the SoD's) and *refiled* on April 7th with the letter of explanation (not March 24th, 2022 as pleaded).

In 49, Neil concedes and admits that Sean was correct and telling the Truth! Sean was served with an Application and Endorsement that had *not* been filed with the Court on March 24th, including an Endorsement from Justice Woodley dated June 4th, 2020, and indicating to Sean that the Endorsement applied to the *Second Application* which had not been filed with the Court or seen by ANY Court Justice (and Sean would suggest it still has not been seen by these Honourable Courts).

When Sean insisted the Application had NOT been filed with the Court and advised Hala he requires Notice when it is ACTUALLY filed with the Court so he can properly object, ***Hala failed to respond, called Sean a liar*** (despite showing Hala a refusal of acceptance from the Barrie Courthouse indicating they could not locate the application in the system), and have continued to deceive Sean about their filings up to and including the date of filing of this Claim.

Between March 24th until the date of this Claim, Hala has been suggesting that both the Endorsement and Application served upon Sean March 24th, ***were filed with the Court and approved by Justice Woodley***. We know for sure that the Honourable Justice had no knowledge of this whatsoever, and no explanation was even offered to the Court until April 7th, and only to cover their tracks because of a complaint to the Law Society. Hala directly and with criminal intent, misrepresented a Justice of Canada's Superior Court, and the *only* Justice in this Matter that Honoured their Oath and protected Sean's interests. Sean would very much like to let Justices Woodley and Casullo review this Matter because that Will resolve this Issue of fraud very quickly indeed. Casullo has no Idea the Application is for a liquidated sum of almost \$350k.

52 is another one that amazes Sean *because* he's dealing with lawyers and Sean is the One they refer to as a 'Self Represented litigant' like it's a disability. Neil ***nonchalantly*** mentions that Justice Casullo ***vacated the objection of King Sean, House von Dehn*** (so it appears they can address Sean properly when they Wish to) on ***May 6th***. Without any Notice to Sean whatsoever? Sean has

been as King of these individuals for disclosure and **when** the Application **will actually be filed** so that he can respond to it. Sean finally gave up on May 29th and placed the whole lot on Notice of Liability for Breach of Trust. And yet they call the Claim, 'unmitigated and unforeseeable'? What more can a Man do than place another on Notice and say he Will take them to Court if they continue to trespass upon him? What really blows Sean's Mind, is that they say all of this like these Honourable Courts are going to be perfectly okay with the fact that Sean knew NOTHING about this until now?! The King thing sounds less crazy every second, doesn't it?

54 annoys Sean. The only One who has been 'harassed', is Sean. Sean has been psychologically and emotionally abused by his brother and sister, intimidated and coerced into consenting to their applications in Court, and advising his brother and sister that he is Entitled to full disclosure before either one of them is even as King for his consent, but they *refuse* to tell Sean anything that Will allow him to participate in the hearing because they know his testimony Will be damaging to Tanja's application. It's abuse, and saying that it's unreasonable for Sean to get angry with his brother and sister when they violate his rights, is what narcissists do. Neil knows damn well that Sean is entitled to disclosure and so does his solicitor, Hala Tabl. To suggest they don't, is gaslighting and they should both have their licenses (and maybe their whole practice) revoked. I Will leave these decisions for this Honourable Court to decide.

55 is threatening more harm to Sean von Dehn's share of the Estate assets. It's so funny, because for People who have not yet been Given a Certificate for an Estate Trustee, they sure like to decide how to spend the Beneficiary's interest in the Estate. Again, none of these individuals Will threaten any further harm to Sean von Dehn's person, that person is a beneficiary of both The Kingdom of Heaven Found a Sean AND Canada's public Trust. The Kingdom of Heaven Found a Sean Will not purchase any debt from Milton's Estates Law or any of their agents for their trespasses upon the Rule of Law, and for believing that trespassing upon a Man's right to fairly participate in the judicial process is a frivolous and vexatious thing to complain about. You are a lawyer, You should be *ashamed* to be telling a Court that Sean had no knowledge of this Endorsement until this Claim against You!!! This IS a tort, in and of itself.

Reply to Hala Tabl: Statement of Defense

And finally, We have the Star of the Show, Hala Tabl, Presented by Jenny Bogod:

Hala Tabl Will need a Good lawyer by the time this Story is done.

The background on this is important because it relates to the type of filing with the Court under the Rules of Civil Procedure regarding small Estates and uncontentionous proceedings. The Key here is that Hala has known this is a contentious proceeding from the start, so it should NEVER have qualified as an application under 74. This was the first Act of fraud.

As stated previously, all three siblings long since came to an agreement regarding the distribution of assets from the Estate. All three siblings agreed to split the remainder funds evenly regardless who is appointed the Trustee. The *only* condition that remained for Sean in the First Application, was that legal fees be paid by Tanja and Michael because Sean had offered to file the Application for them if they would provide him with the information to save on costs. They insisted they Wished to have a lawyer do the job, so Sean said that was on their dime if they do. Michael agreed, and even agreed to pay the legal fees from his share if Tanja did not agree. Tanja agreed. She was as King if Sean would meet Hala at the Ottawa Courthouse to Give the conditional consent form to Hala by hand to save time mailing the document. Sean agreed. When Sean met Hala at the Ottawa Courthouse, she *refused acceptance* of Sean's consent. And when Sean said that he was under the impression that it was an Act of dis-Honour to refuse acceptance of documents for One's client, Hala said to Sean, "I'm not Your sister's lawyer!", and scurried off back to her chambers (or wherever she goes). Sean was stunned. By the time he had walked outside the Courthouse, Tanja was already calling, as King Sean why he refused to Give the consent form he Promised. He told Tanja that he did take it and that Hala refused to accept and offered only the unconditional consent form, 'Well, that's not what My lawyer said, she said You didn't bring anything and said You Will never consent!'

The three children had already been at each other's throats figuratively speaking for almost six months about the Estate, this was the resolution that made every One happy. It was STILL done under false pretenses because both Michael and

Tanja had lied to Sean about the condition of the Estate and the default on the mortgage, but it wouldn't have been too late to remedy if Tanja had access to the equity. This ruined that opportunity and is the 'cause of action' for every other dispute about this Estate and the continuous suggestion that Sean is trying to take the Estate for himself. He has Promised to offer his Word, contract, notarized, if they Wish. They still equate Supreme Claim of right to 'only', or 'sole' Claim of right, but it is to defame Sean's Character and it really is a small detail because the other parties could insist it be a condition of the Certificate and obligation of the appointed Trustee, and Sean has told his brother and sister these things many times. But let's start with the SoD of Hala Tabl.

We'll cover points that are unanimous among the parties at the end (1-4). Paragraph 5 is correct, The Kingdom of Heaven Found a Sean is an Express Trust Organization, and Sean is the governing/directing Mind of the artificial entity - otherwise known in Law as a Trustee or Executor, the governing Mind of the Trust. This is no different from the 'artificial' person Created by the state that is a legal entity where Sean (the Man) would be the governing Mind of that entity. But that artificial, legal person and entity is a Beneficiary of the public Trust, whereas King Sean is the Man for whom that Trust was allegedly Created to Benefit and is Acting as Trustee and Executor of the Man's Will, who is also named Sean von Dehn. King Sean distinguishes the real Man from his artificial legal person. If the artificial person with no Mind can be a legal entity with Sean's direction, then so can the Kingdom of Heaven Found a Sean if Sean is Acting as the Trustee or Executor.

6 and 7 are True, so We Will jump to number 8. The Kingdom of Heaven Found a Sean is an Express Trust. I'm not sure if it's a legal entity or not, but it has lawful rights and fiduciary obligations, which do constitute a juridical person.

The fact is, The Kingdom of Heaven Found a Sean is a legal and lawful entity by Way of demonstrable causality. Sean was as King of the Registrar at the Ottawa Courthouse if it is possible to file a Claim in the name of his Trust, or must it be filed in the name of the Executor or Trustee. The Registrar confirmed that Sean can file the Claim in the name of the Trust. Sean was as King if it is necessary to file a copy of the Trust instrument with the Court at the time of filing. The Court said it was not, so long as each of the *responding* parties to the Claim have one. Sean again was as King if the Court was okay with the terms 'Claimant' and

'Respondent' because Sean knows that's what the parties are called in Matters of equity. Again, the Registrar confirmed that doing so is acceptable to the Court and *not a violation of the Rules*. The Registrar pointed out that the Court Will know why I've done these things because the Information for Court use form Will let the Court know that this is a Matter in Equity dealing with Fiduciary and Trust obligations.

The *fact* is, Sean knows that lawyers like to pick on frivolous and vexatious points so that they can try to distract the Court from the real Issues before them, so Sean took very careful time and consideration with respect to how he would draft this Claim, and made sure that everything he was filing with the Registrar was in compliance with the Rules. The Claim was accepted as meeting the requirements of the Court with respect to the Style of the Title, the name of the Trust, and its respective representative positions. The Court has already ruled on the Title of the Claim and how the parties to it were Styled. Sean has also conceded that if the opposing parties are offended by 'Respondent', he Will happily refer to them as Defendants from this point forward.

The Kingdom of Heaven Found a Sean filed a Claim into Ontario's Superior Court by Way of the King's Hand, Stephen, on October 4th, 2022. All Respondents, *responded* to it, each with slightly different variations of the same Story. All Defendants have since filed a Motion and identified The Kingdom of Heaven Found a Sean as the plaintiff of this Claim, 'Self represented'. A plaintiff is the one bringing a claim in a civil proceeding, so by Way of demonstrable causality on a Court of Record, You can't say that The Kingdom of Heaven Found a Sean is not a legal entity when You have just responded to a legal action commenced by it, answered to it, and referred to it as the plaintiff. If The Kingdom of Heaven Found a Sean was NOT a legal entity, it became one the moment this Claim was filed with the Ontario Superior Court to compel performance in accordance with Sean's Trust and Fiduciary obligations to it. Furthermore, You were legally and lawfully served a Notice of Liability for Breach of the Trust with a copy of the Trust instrument and Declaration (Declare a Sean) attached on May 29th, *weeks* after an Endorsement Sean knew *nothing about* was known to You. If You Wished to dispute The Kingdom of Heaven Found a Sean as a Trust entity, the time to respond and make that objection (or any others) expired long before the Claim was filed (which is the whole purpose to placing One on Notice - to Give One an opportunity to resolve *outside* of Court).

The Trust is also filed with Canada's Minister of Justice and Attorney General, and Canada's Registrar General for Vital Statistics. Both offices have officially recognized Sean's Trust in God. Again, the Court has already ruled on this point. The Trust and the Record of its filing with Canada's Ministry of the Attorney General is Published on the International Court of Record at www.vondehnvisuals.com/my-story. It's worth noting that all Claims or Applications filed with Canada's Courts are also Published online for Public viewing and educational purposes for Self Presented, Sui Juris litigants.

Number 11 in this SoD states that The Kingdom of Heaven Found a Sean is not an intestate heir. This is a trick and a trap. They are trying to suggest that the Claim made by The Kingdom of Heaven Found a Sean ('The Trust) is an Estate application to support their request for Issue Estoppel and or Res Judicata. This Claim has nothing to do with the CAET application with the exception that whomever is awarded the Certificate is going to be liable *legally* for the economic harm done to the Estate and its intended Beneficiaries, and for interfering with Sean's right to participate in the judicial process. The fact that You are suggesting this is Res Judicata and a Matter already decided only confirms that the Claim is necessary and justified because Sean knew nothing about it until he filed the Claim! And apparently, Tanja is next liable to Hala because she was awarded the Certificate, right? Isn't that what the Certificate is for, taking care of any Claims against the Estate? Well, The Trust believes that Tanja and Michael are responsible for serious damage to the Value of the Estate and serious undue emotional and psychological abuse to their older Brother, and is making this Claim on behalf of Joachim and Sean. Sean believes that the owners in due course of an intestate Estate have a duty and responsibility to protect those assets BEFORE they are awarded a CAET or *Ordered* by a Court or creditors to do so. Apparently, Tanja and Michael are thing King they are not liable for any of the harm they have done to the Value of the Estate *until* the Certificate is awarded to some One. The CAET is not going to change anything as far as Sean is concerned, the damage is already done and the purpose of this Claim is to find out who is responsible.

I find the language in paragraph 12 very interesting, "to *advance* an application". That is distinctly different from filing a new application, or Second Application. Again, I suggest this is the First Application that Hala claims to have withdrawn,

refiled with the Court as the Second Application (Fraudulent Application). Keep in Mind, it contains defamatory, fraudulent statements regarding Sean's Character that Hala promises are withdrawn from the Record (and has sworn under penalty of perjury to be True on June 19th, 2020 in her SoD). If she places that application back on the Record without My knowledge, that is serious fraud, and that's exactly what Sean believes they did. If it is the First Application refiled, it also contains the requests to the Justice to deny Sean's right to object, to be denied his right to file, and to pay the legal costs for Tanja and Michael. This Endorsement has been awarded against Sean, once again showing motive to shut him out of the proceedings with intent, and to cause harm to his share of the Estate. For point 13, Sean Will just remind the Courts that he is hearing this for the first time in this SoD! This Endorsement was awarded May 6th, Sean has heard no Word since, and Tanja's requirement for a bond to pick up \$350k *in cash* was dispensed with!? A little concerning...

And 14 is the other cause of Action for this Claim - no CAET has yet been awarded. Why not? Because they require My consent and the Courts Will not let them receive the Certificate without it? That's not a fact, just My best guess. Why else would they still be waiting to pick up the cash if the Certificate was Endorsed on May 6? Because the Courts are onto them and have requested for Sean to Sign off before they can receive the Certificate? The Courts are great that Way, so I believe it is possible and they would be too stubborn to tell Sean. They Wish to Order this Court to *require* Sean's consent so that Tanja and Michael can *finally* steal Sean's share, and hammer down the last proverbial nails into the lid of his later father's coffin.

It also means that if no CAET has been awarded and no ETDL has been awarded, then how did the value of the property go from a house, two vehicles and whatever else to a liquidated sum of cash without any One being appointed to protect Joachim von Dehn's legal interests? Who should We blame in that regard? The Courts? Did any One bring a Claim against Sean's father into the Courts? Because the Courts were put on Notice that Sean Will take care of any legal Matters concerning Joachim's Estate as his Trustee, Executor, and the Living Will of his father in heaven. How does one *legally* steal a house without any due process of Law or Judicial oversight? Sean Will look forward to as King that Question of this Honourable Court, and the People who stole his father's House.

In 15-18, Hala Tabl argues she has no duty or obligation to obey the Rule of Law, the Rules of Civil Procedure, or the Rules of the Court. She has no duty to Act Honourably, or to advise clients of the limits of their lawful capacity, and to NOT interfere with judicial procedure or commit fraud in Estate applications? I strongly disagree, and I have covered this already.

For 19, Hala cites the Trustee Act, the Estates Act and the Negligence Act. Sean believes they all apply; the Negligence and Estates Act apply to Hala and Tanja and both of those Acts were seriously violated by Hala Tabl. The Trustee Act applies to this Claim, and Sean's power to enforce the Codes, Statutes and Acts of Canada necessary to compel performance in accordance with The Trust. Sean relies on 66-68 of the Trustee Act, and Will quote the Title of 68 to finish this review of Hala's Sod with, '**Express Terms of Trust Instrument to Prevail**'.

Reply in Opposition of Rule 21 Motion to Dismiss

Sean Will now address the Motion itself, once again Presented by the moving party, Hala Tabl's Jenny Bogod.

Well, wouldn't You know, We've covered most of these points already. But to review, Issue Estoppel does not apply because this is a private Trust obligation and has nothing to do with who is awarded a CAET. Res Judicata does not apply because Sean doesn't care which of his two siblings Will receive the Certificate except for the purpose of lie-ability. To call Court fraud, Willful, criminal intent to trespass upon a Man's right to due process of the Law and deliberate intent to interfere with Justice on *many counts*, 'frivolous and vexatious', is borderline insane.

The only thing that is frivolous and vexatious about this Claim, are the continuous attacks upon the Character of its Trustee, and suggesting that Court fraud and gross contempt for the Rules of the Court and the Rules of Civil Procedure are in any Way acceptable conduct for a licensed lawyer who should know these things better than Sean. Hala and other lawyers should be setting the example of Honour and Justice in Canada's judicial system for Tanja and Michael, not

helping them to get around the Rules of Civil Procedure to interfere with a Man's right to a fair and impartial hearing. And *The Trust* is the one abusing the Courts? The audacity after what Your client has done is Mind numbing!

Evidence - The Smoking Gun

This is the most confusing piece of the puzzle because once One puts the piece in place, the picture seems pretty clear. If the opposing parties had not included this piece of evidence in their motion materials, it would have been much more difficult to defend against this Motion. Sean can understand People thing King he is crazy and equating it to stupid or incompetent or something - but surely the moving party can't be thing King the same thing of a Court Judge? Do they really expect a Court Judge to just glaze over all of this corruption and turn a blind eye because they don't like the *Title of the Claim*?!

I mean, if *I know* that every application made to the Court starts with the CV number of the year it was filed, obviously a Court Judge Will know, too. Yet they Present evidence as 'proof' that they filed the March 24th application? Everything they state in their SoD and Motion materials says otherwise. Neil says that on March 24th the Second Application was filed with the Court, and that an Endorsement from Honourable Justice Woodley was binding upon it. They *didn't even file the Application until April 7th*, though Neil states these two documents were filed *together*, along with a Letter to the Court and *another* Affidavit sworn by Tanja Johnson (which Sean didn't see and knows nothing about, but presumes Tanja has been just as flattering toward Sean in her second Affidavit as she was in the first). So We know for sure from Neil's own SoD under penalty of perjury, that Hala Tabl was lying to Sean, and that the Application served upon him March 24th, 2022 was NOT filed with the Court, and Sean received no further Notice regarding the Matter, but went *out of his Mind* trying to respond to it, while all the Superior Courts and the Courthouse in Barrie tell Sean that there is no application in the system, or the Bracebridge Courthouse says the Application has not yet been 'entered into the system' (whatever that means because things were getting done without any Notice to Sean whatsoever). Even while the Law Society of Ontario was investigating this Matter, Hala Tabl *insisted* that the Application served upon Me with Woodley's

Endorsement was filed with the Court, and that the Justice had approved the new application.

The True Story is that as of September 17th, 2022, there is no Record of this Estate in the system whatsoever!

The Bracebridge Courthouse did get back to Sean the morning after he contacted the Minister of Justice and Attorney General regarding the Bracebridge Courthouse's failure to respond to Sean's email queries. They confirmed that an application was started and *they have all the files but nothing has been entered onto the system yet because of 'covid delays'*. Really? Three years later?

No. Hala has a 'Friend' at the Bracebridge Courthouse screening Sean's emails and filing documents for Hala *without* placing them on the Court of Record so that Sean can't reply, and can't find any information about the file no Matter which Court he calls or how hard he tries. Imagine the madness Sean has been subject to. The Law Society ended their investigation because they 'do not have the authority or jurisdiction to comment on Court fraud, that requires a Judge'. And apparently, they can't speak to Court filings, either, which were the two things Sean complained to the Law Society about. Go figure the Law Society can't speak to whether or not a document was filed with the Court. The Law Society did tell Sean to contact them as soon as he receives a ruling on the Issue of Court fraud. This Will be the first time I am Presenting the information to a Justice and wouldn't You know, I don't even have to inform on any One, the moving party did it all on their own.

But there's *even more madness* than One informing on their Self in their own Motion materials. This Motion is a Rule 21 Motion to Dismiss. No evidence is permitted in a Rule 21 Motion hearing except by the consent of all parties. I Wish to let this Court know that I did not consent to any evidence being Presented at this Motion, and if the moving party Wishes to enter their evidence, then they acknowledge that their Motion to Dismiss no longer qualifies under a Rule 21 Motion.

The moving party is relying on 21.01(1)(b), and 21.01(3)(d), but Rule 21.01(2)(b) states that:

(2) No evidence is admissible on a motion, (a) under clause (1)(a), except with leave of a judge or on consent of the parties; (b) **under clause (1)(b)**.

The other problem with the Evidence is that it is not admissible as evidence unless it is complete and this is only part of the Story with the best parts redacted. We're all adults, if there are Good bits to see, We are all old enough. Where is the Letter to the Court and what does it have to say? Where is the new Affidavit Tanja Johnson has Sworn against her brother? Come on, Hala, We all Wish to know what was in the Letter. And, *most importantly, where is the **Second Application?! Why is Justice Casullo commenting on how *small* the value of the Estate is if it's **over double the maximum amount** of a small Estate for uncontentious proceedings as filed under Rule 74? Why was it EVER filed under Rule 74 if Hala knows it's a contentious proceeding, regardless of the dollar Value? It doesn't make any sense. The evidence leaves more questions than answers, and if the moving party Wishes to enter the Evidence, We need to see all of it, not just the Parts they Wish to Show. Sean would like the 'unredacted', adult version, please - this is just a teaser and Sean is getting excited.***

The Conspirators Strategy

Sean Truly can't get over the Evidence Presented by the Moving party. It seems unthinkable to Imagine that any One sitting for Canada's Courts could read the Motion materials and not *immediately* recognize that this is an incredible (if not heroic) attempt to gaslight One's Way to freedom. Unfortunately, criminals get careless, and eventually caught. From a CV number for a filing alleged to have taken place in 22 reading 'CV-20-59' as their solitary, star piece of evidence, to stating that Sean was served with an Application and Endorsement on March 24th that was filed into the Court, only to find out that it wasn't filed into the Court until April 7th by Way of their own testimony... If these things are so glaringly obvious for Sean to see, how blinding Will the Light of this testimony be to a Judge who has probably seen this sort of thing hundreds of times? So why would they do it, how could any of this *possibly* get by a Court Judge? From trying to figure out what's going on with his father's Estate, to trying to figure out what is going on with the Courts, Sean's Mind has had no time to rest.

Clearly, the Defendants must have been thing King Sean is stupid and hoping the Court Will believe it, too. Sean is thing King the Defendants presume that if they file any Motion to dismiss as frivolous and vexatious, they won't need to have any evidence to support their Motion because the Courts Will just presume they are correct because it's three big law firms against a Self Presented Man who goes by 'King Sean, House von Dehn', and represents a private Trust who the Courts Will immediately Write off as crazy without even reading a Word. They are hoping that this Motion Will succeed based exclusively on the name of the Trust and its Trustee.

Honestly, it's the best Idea Sean has. They have *nothing* of substance, Tanja and Michael both blatantly admit to having no accountability or responsibility to protect the property from creditors and default, which is nothing more than an admission of liability. Who ELSE was going to keep the mortgage from going into default?! It is the most futile, ridiculous legal argument Sean has ever read (okay, that might be a stretch - but it's up there!). The SoD clearly indicates that Sean was not included at all in the administration of his father's Estate or the CAET process, so ONLY Tanja, Michael or Hala could be responsible, and that is why they are in this Courtroom now.

Sean doesn't have a single Word on the Record of the Estate application that he Presented to the Court him Self. Notices Hala alleges to have filed *for Sean* without any notice to him, while simultaneously saying she is not liable to him? It's incredible, really. Sean says let's take a look at the documents that have actually been filed in the Estate Application process for Joachim von Dehn and see how many frivolous and vexatious things Sean has said 'on the Record'.

There is not One Word entered onto the Court of Record by Sean in the Estate application, period!!! They conspired together to trespass upon Sean's right to participate in the Judicial process, and they succeeded. Congratulations, Tanja, You succeeded in doing what Sean said could not be done, and that's usually his gig. That's not even facetious, You exceeded all Sean's expect-a-Sean's this time.

The strategy was twofold. The first hope was that the Court would see 'The Kingdom of Heaven Found a Sean' and immediately dismiss the case without any consideration at all. The hope was that Sean would be too incompetent or

incapable of putting together the Motion materials to respond, or that they would be so terribly organized the Court Will dismiss on those grounds. The other hope was to buy more time to cover their tracks, while using the Motion as an excuse to withhold the information necessary for Discovery of facts.

The first reply Sean received to a requisition for Discovery of the receipt of filing of the March 24th application, Jenny Bogod responded to tell Sean that no discovery Will be forthcoming from any party until after the Motion. Now the Motion makes sense, right? They were just hoping to be able to Keep the information from Sean until the Motion, have the Justice *require* Sean to Sign the Application so Tanja can claim her Certificate from the Court, and *never* be compelled to provide Sean with any disclosure or his share of the assets. If Michael and Tanja didn't contact Sean to let him know about an Endorsement awarded to Tanja on May 6th, and have still not contacted him to this day, what reason does Sean have to believe he would ever have heard from Tanja or Michael again if he had not filed this Claim? This is not an abuse of the Court process, this is exactly what these Honourable Courts are for - *Justice*, not 'just is', or just as Tanja and Michael Wish for it to be.

The Silver Lining

Sean really is the eternal optimist, and there is always a Silver Lining. The Good News is that Sean doesn't believe the Courts Will even consider dismissing this Claim because the Ottawa Courthouse has always been exceptional. Sean feels very lucky to Live in Ottawa *because* of the staff at the Ottawa Courthouse. It was staff at the Ottawa Courthouse who helped Sean to confirm that Hala had committed fraud by advising that the application served on him would have a CV number if it had been filed, as well as the Registrar's signature (Sean knew that but confirmation from the Court is always appreciated). They helped to provide Sean with direction. Sean was advised that if a party is not filing their documents with the Court, Sean Will have to start his own action, or file a motion. Even the police couldn't help because there is no information in the system at all! Only a Judge can make a ruling on fraud, and until Sean found a Way to get these People into Court, there really is nothing any One can do.

The Silver Lining is that Canada's Courts are some of the best in the world, and if the Courts had any Idea that Sean was not receiving Notice of Applications in time to participate in accordance with the Rules, they Will *always* let him know. Never has Sean sent a request for direction to the Ottawa Courthouse and *not* received a reply - *never!* The *Bracebridge* Courthouse on the other hand... Sean knew something was going on because he knows the Rules of the Court well enough to know he's entitled to service of documents before any hearing (exactly like this Motion hearing). So Sean could not understand what Hala was tall King about when she said she'd filed Applications without any Notice of when the hearing for the Application Will be heard. It was maddening, infuriating. Imagine running around for over two years trying to apply to an application that *doesn't exist!* That's what Hala Tabl, Tanja Johnson, and Michael von Dehn did to Sean.

As of September 17th, ***none*** of the documents 'filed' by Hala are actually in the system, they are sitting at the Registrar's desk somewhere in Bracebridge Ontario *unfiled* with the Court, while Hala makes Magic happen for her client in private so Sean can't participate. How much more obvious can it be that Sean was denied his right to judicial process if he's only learning about all of this now?

Tanja Johnson was the Motivator. Tanja Will go to great lengths to spite her older brother, and Hala Tabl was happy to make it happen. Sean knew Tanja Wished to shut her out of the proceedings and Sean told her it would not be possible because the Courts Will never let that happen, "We Live in Canada, Tanja, People have a right to full disclosure of all Matters concerning their interest."

"No, Sean. It's two against one and majority rules - this application Will succeed with or without Your consent."

The confidence she said it with was the eerie part. Sean has the phone conversation recorded but he's not entering it as evidence. Sean told Tanja she was wrong, that the Courts Will require proof of service and they won't award a certificate without the consent of all parties. Tanja was very confident she could make it happen, and Tanja knows nothing about the Rule of Law - this was something Hala had Promised to *make happen* for Tanja, and it was made clear that Sean would not be participating in the conversation.

Sean has no idea how involved Michael might be, but believes he probably knows very little if anything about what Tanja and her lawyer have been up to. Michael doesn't really care if he receives documents, he hadn't even read the First Endorsement when Sean called Michael as King of him why he would consent to such horrible requests against his brother. Michael said he knew nothing about it and certainly wasn't as King for it. He even went as far as to defend Tanja, suggesting it was her lawyer, Hala that must have made those requests. The Law Society confirmed that Hala has done nothing for her client that her client was not as King of her to do.

Conclusion

Tanja might have been the Motivator, but Hala had the power to make Tanja's dreams of cutting her brother out of the judicial process spring to life. Hala was the Mastermind behind filing but 'not filing' documents to confuse and disorient Sean, get meetings with Court officials without Sean's consent in violation of Rule 1.09, and refuse to respond to correspondences about what is going on, or even to rebut an objection. Hala did not rebut one argument Sean ever made, she would just take his objections and allegedly make them on his behalf without his knowledge or consent. Michael is probably the least liable, but the fact is, he was deceived by his sister in the first application and trusted her again for the second, knowing what Tanja had been as King of the Justice for against her brother the first time around. So Michael doesn't get a free pass, either, he's guilty by association, and for continuing to keep this information from Sean. The worst part is, if Hala is not brought to justice, Sean's brother and sister will be thinking King that this kind of behaviour is perfectly normal in Canada's Courts when it is the polar opposite of what one should experience in Canada's judicial process. They will believe there is nothing wrong with consenting to applications one has not seen, or ambushing people in litigation, or attempting to deceive the Court. They have witnessed criminal offenses and may believe that this is what people should expect in Canada's Courts, or (even worse) what lawyers can do to help people get around the Rule of Law. I will be publishing this Motion and the outcome, so I am hoping that is not the case, I like to champion Canada's Justice system whenever I can.

As far as Michael's crimes are concerned:

Punishment

(3) Every one who commits mischief in relation to property that is **a testamentary instrument** or the **value of which exceeds five thousand dollars**

- **(a)** is guilty of an **indictable offence** and liable to imprisonment for a term not exceeding ten years; or
- **(b)** is guilty of an offence punishable on summary conviction.

As far as Hala and Tanja are concerned:

Obstructing justice

- **139 (1)** Every one who **wilfully** attempts **in any manner** to **obstruct, pervert or defeat the course of justice in a judicial proceeding**,
 - **(a)** by indemnifying or agreeing to indemnify a surety, in any way and either in whole or in part, or
 - **(b)** where he is a surety, by accepting or agreeing to accept a fee or any form of indemnity whether in whole or in part from or in respect of a person who is released or is to be released from custody,
- is guilty of
 - **(c)** an indictable offence and is liable to imprisonment for a term not exceeding two years, or
 - **(d)** an offence punishable on summary conviction.
- **Marginal note:**
- **Idem**

(2) Every person who intentionally attempts in any manner other than a manner described in subsection (1) to obstruct, pervert or defeat the course of justice is guilty of

 - **(a)** an indictable offence and liable to imprisonment for a term of not more than 10 years; or
 - **(b)** an offence punishable on summary conviction.

A Happy Ending

Sean could tell the parties that he is relying on Canada's Criminal Codes to compel performance of his Trust obligations if the moving party Wishes to be stringent on frivolous details like the name of the Trust, hoping it is sufficient to ignore these criminal trespasses upon Sean. Is that the Wish of the moving party, to be subject to Canada's Criminal Code for the fraud, deceit, and trespass upon Sean's right to a fair and impartial hearing? Or does the Claim seem a little more reasonable now?

The Trust Will not be as King of the Justice for any Criminal Charges to be laid if the Defendants agree to fulfill the Claim. If they agree to fulfill the Claim, the Criminal Codes of Canada Will not be enforced by this Court.

Because none of this would have been possible without the help of Hala Tabl, and because King Sean Imagines she probably Wishes to Keep her license and reputation as pristine as possible, Hala Will pay the dollar Value of the Claim, and no (further) report on this Issue Will be made to the Law Society, and all public Notices against Hala for her fraud Will be removed from www.vondehnvisuals.com. It's a very small price to pay for a get out of jail (not so free) card and to keep her license. The Trust Will not be as King to have Hala's license revoked if she agrees to pay the Claim. If she does not, Sean is as King for these Honourable Courts to enforce the Criminal Codes cited above, and to arrest Hala Tabl and any other Defendant who is a party to these crimes that do not Wish to take accountability for their trespasses against Sean.

Tanja Johnson Will pay all legal fees for all parties to this Claim (including King Sean's), and all costs from the power of sale out of her share of the Estate assets. That is for as King Sean to pay all her costs to be excluded. She Will collect the remainder funds from the creditors and pay the difference in costs to restore the full Value of the sale of \$425,000.00, into The Trust. Tanja can take as long as she Wishes to pay the difference from the remaining funds available, but she does not receive any Benefit from The Trust until The Trust obligation is fulfilled, and the available funds must be paid into The Trust immediately upon receiving them. If Tanja fails to fulfill any of these obligations, she Will be subject to arrest and bail Will be posted in the amount owed to The Trust.

Tanja Will also use the Certificate to Claim the land deed for 1070 Hewitt St. Gravenhurst, Ontario from the Land Registry office for transfer to The Kingdom of Heaven Found a Sean Trust.

Sean Will take care of the People who stole his father's House, and evict the unlawful tenant.

On these conditions, Sean Will Grant Tanja the Certificate of Appointment of Estate Trustee.

Michael Will be responsible for the Porsche. It Will also be Registered in the name of The Trust. Sean and Michael Will shop for the car together because it Will be Fun and Exciting.

The funds received by the Trust Will be paid out to each of the Beneficiaries equally as agreed, ab initio. Tanja and Michael Will not receive their share until they fulfill the above obligations. Tanja and Michael can receive no Benefit from The Trust until they fulfill their obligations.

The funds received by the Trust for this Claim Will be used to pay Catherine von Dehn's mortgage and any dental care Sean requires. The remaining difference Will be invested in Real wealth for the Beneficiaries (silver and gold), and divided into equal shares. Sean Will maintain detailed Records for all Beneficiaries.

Sean *Trusts* these terms and conditions Will be acceptable to all parties, and preferable to criminal charges?

The King Thing

It is always the Elephant in the room, so it may as well be addressed. The King thing is real, We are all Kings and Queens in a Constitutional Democratic Monarchy; authority of the government is derived by the consent of its Sovereign People.

The irony is, King Sean claims ownership of nothing but his Sacred Calling, his body, the 'I' land of Sean, his father's House and lineage, 'von Dehn', and his Will, Stephen, the Holy Spirit that animates God's Kingdom and brings it to Life. King Sean started out as something of a joke to distinguish the Man from the artificial legal person Created in the likeness of his name *exclusively*. The problem is, most People are thing King that they *are* the person, so no One could understand what Sean was tall King about when he would say, "I'm not a person, I *have* [use of] a person (and usury privileges)."

The real purpose was to distinguish the Trustee and Executor of the Trust from the artificial person Created by the state in the same name (sort of/likeness). King Sean is the Trustee and Executor for the artificial person's Benefit, which was placed in God's Trust. Sean hopes that helps to clarify.

Authority and Law

The Situs of the Trust determines the jurisdiction of the Court. The Trust instrument is the whole of the Law. This Claim, the Trust, and its Beneficiaries are not subject to any code, statute or act that trespasses upon a Trust obligation.

The Trust relies on the Trust Instrument exclusively. But for the lovers of Acts and the Benefit of the moving party, The Trust Will also rely on the Trustee Act as follows:

Application of Act

66 Subject to section 67, unless otherwise expressed therein, this Act applies to *all trusts whenever created and to all trustees whenever appointed*. R.S.O. 1990, c. T.23, s. 66.

Powers, etc. under Act and trust instrument

67 The **powers, rights and immunities** conferred by this Act are *in addition to those conferred by the instrument creating the trust, and have effect subject to the terms thereof*. R.S.O. 1990, c. T.23, s. 67.

Express terms of trust instrument to prevail

68 *Nothing in this Act authorizes a trustee to do anything that the trustee is in express terms forbidden to do, or to omit to do anything that the trustee is in express terms directed to do by the instrument creating the trust*. R.S.O. 1990, c. T.23, s. 68

Post Script for Judge

I'm sure this Reply Factum is unlike anything these Honourable Courts have ever seen, but I have arranged the contents in a Way that should help to navigate this Motion more smoothly. The Factum was Writ in direct response to the moving party's materials so that One can read each Statement of Defense and view Sean's responses to them in a coherent order. Sean has also included a Table of Contents with links for ease of reference.

Otherwise, the intent was to Honour My own Writing Style because this Truly is the fulfillment of a Trust obligation, and it is an important Historical Artifact (Art-I-Fact) for House von Dehn with respect to the Honour of My late father who

Truly did Trust Me to protect his house from power of sale. Oh, and on a side note and something of a punch-line (the kind that knocks One out), it would have cost \$200/month to keep the mortgage in Good standing - \$100/month each. I told them if they didn't do this, they would be required to file an application and then they'd be forced to deal with Me. And here We are...

I also Imagine Judges spend a lot of time on the bench and hear a lot of really dry, boring stories. My hope was to make this one a little more enjoyable to read, and My unusual Writing Style is a blend of Canadian and Germanic tradition where Words in the German language are Given capitals if they are deemed important.

I'd like to thank these Honourable Courts for Your time today, and I hope I haven't taken too much, I know only too well how precious a Man's time is (regardless their sex/kind). Please do Keep in Mind, I've been waiting to be heard by a Court for almost three years.

Love and Blessings,

King Sean, House von Dehn,

Notice of Liability for Breach of Trust, Trespass on Fiduciary Obligations

2 messages

vonDehnVision <gnosticwisdom37@gmail.com>

Sun, May 29, 2022 at 10:19 PM

To: Tanja Johnson <tvondehn@cloud.com>, Mike von Dehn <mvondehn@trilliumwest.com>, Hala Tabl <htabl@miltonsp.com>

Attention Tanja Selma Johnson,

You agreed by Way of Our phone conversation to accept full [commercial] liability for all harm done to the Estate by Noah S. Potechin and Laraine Burton in accordance with the Notices of Civil and Criminal liability served upon them and filed with the Court. You and Michael were also witnesses to this Notice and all other public Notices legally and lawfully served upon the intervisor of My Trust instrument. You are also trespassing upon My Trust obligations and agreed to accept full liability for doing so.

You are currently liable as follows:

\$506,100.74 were due and payable to the Court on February 26th, 2022, and Noah was advised that if payment was not received before the end of February 28th, an additional 10% interest would be added, compounding monthly beginning March 1st.

\$506,100.74 + 10% due Feb. 28th = \$556,260.81

\$556,260.81 + 10% beginning March 1st = \$611,886.90

\$611,886.90 + 10% April 1st = \$673,075.59

\$673,075.59 + 10% May 1st = \$740,383.15

\$740,383.15 + 10% June 1st = \$814,421.46

if not paid on or before June 1st, the per diem rate for June is \$2,714.73, or \$895,863.60 due July 1st.

The longer You wait, the greater the harm done, the greater Your commercial lie-ability - and it appears You are very Good at the lie-ability stuff. Too bad You're not so great at providing Me with the disclosure and receipt of filing I am entitled to. I Will be drafting My Claim on My next name day (June 5th), if You do not respond to this email. These terms and conditions are legally and lawfully binding lest You Wish to negotiate with Me before that date, provide Me with FULL DISCLOSURE of all email and other correspondence between Your Self and any creditors for the period between October 28th, 2019 and the date of this email, May 29th, 2022.

Blessings,

King Sean, House von Dehn,

Hand of Stephen,

The Kingdom of Heaven Found a Sean (RN# 102383288CA)

Find attached a copy of the Trust Instrument and Declare a Sean

