

CANADA

PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL

No.: 500-17

**SUPERIOR COURT**  
**(Civil Division)**

---

**KAHENTINETHA**, domiciled and residing at  
Kahnawake, P.O Box 991

**KAWENAA**, domiciled and residing at  
Kahnawake, P.O Box 991

**KARENNATHA**, domiciled and residing at  
Kahnawake, P.O Box 991

**KARAKWINE**, domiciled and residing at  
Kahnawake, P.O Box 991

**KWETIIO**, domiciled and residing at  
Kahnawake, P.O Box 991

**OTSITSATAKEN**, domiciled and residing at  
Kahnawake, P.O Box 991

**KARONHIATE**, domiciled and residing at  
Kahnawake, P.O Box 991

**Plaintiffs**

v.

**SOCIÉTÉ QUÉBÉCOISE DES  
INFRASTRUCTURES**, legal person having an  
establishment at 445, Saint-Gabriel Street,  
Montreal, Quebec H2Y 3A2

**ROYAL VICTORIA HOSPITAL**, legal person  
duly constituted, having its head office at 337-  
8300 Decarie Boulevard, City of Montreal,  
Province of Quebec, H4P 2P5

**MCGILL UNIVERSITY HEALTH CENTRE**,  
legal person duly constituted, having its head  
office at 610-8300 Decarie Boulevard, City of  
Montreal, Province of Quebec, H4P 2P5

**MCGILL UNIVERSITY**, legal person having an  
establishment at James Administrative Building  
Room 506, located at 845, Sherbrooke  
Street W. Montreal, Quebec H3A 0G4

---

**VILLE DE MONTRÉAL**, legal person having an establishment at 800, De Maisonneuve Blvd E., Montreal, Quebec H2L 4L8

**STANTEC INC.**, legal person having an establishment at 555, René-Lévesque Blvd W. #200, Montreal, Quebec H2Z 1B1

**ATTORNEY GENERAL OF CANADA**, representing the Federal Government of Canada, having its Quebec regional office at the Department of Justice Canada, Guy-Favreau Complex, East Tower, 9th Floor, 200 René-Levesque Boulevard West, Montreal, Quebec, H2Z 1X4

---

**Defendants**

---

**ORIGINATING APPLICATION FOR DECLARATORY RELIEF AND TO OBTAIN AN  
INTERLOCUTORY AND A PERMANENT INJUNCTION  
(ss. 141, 142, 509, 510, 511 C.C.P.)**

---

**TO A JUDGE OF THE SUPERIOR COURT OF QUÉBEC, SITTING IN THE DISTRICT OF MONTREAL, THE PLAINTIFFS ALLEGE THE FOLLOWING:**

**Introduction**

1. The kaianerehkó:wa, Great Law of Peace, has been the original constitution of the original rotinonshonni (Iroquois) people since time immemorial. It has never been revoked and is sovereign on traditional rotinonshonni territory.
2. Section 35 of the *Constitution Act, 1982*, recognizes and affirms existing aboriginal rights, whose content the courts have held to be sourced in Indigenous legal orders, e.g. the kaianerehkó:wa and teiohateh (Two Row Wampum), as traditional legal frameworks for unceded rotinonshonni (Iroquois) territories. The kaianerehkó:wa and teiohateh (Two Row Wampum) apply in this case and every other case in this territory.

**The Plaintiffs**

3. The Plaintiffs are sovereign Indigenous peoples who have never ceded or surrendered their traditional land, law, and customs. Their inherent rights to live according to their own ways are guaranteed by the United Nations Declaration on the

Rights of Indigenous Peoples, and their relationship with Canada follows a nation-to-nation basis in accordance with international law, as well as the tehiohate (Two Row Wampum) and Silver Covenant Chain agreements which have historically regulated their relationship with the British Crown.

4. The Plaintiffs follow the traditional constitution of the rotinohsonni (Iroquois) confederacy and the kanien'kehá:ka nation, the kaianerehkó:wa (Great Peace) and its clan-based consensual decision-making system, as they have done for time immemorial. The protocols of the kaianerehkó:wa provide the legal framework for the defendants' representation.
5. The Plaintiffs have been acknowledged and authorized to act as delegates in charge of protecting the collective rights of the sovereign kanien'kehá:ka people following the traditional clan-based consensual decision-making enclosed within the precolonial constitution of the rotinohsonni confederacy, the kaianerehkó:wa (Great Peace).
6. The duties and responsibilities of the Plaintiffs were determined during a meeting of the kahnistensera (women's council fire), which is traditionally in charge of selecting speakers. The meeting was held in March 2022 in Kahnawake – the rotinohsonni community closest to the settler city of Montreal, and which is therefore responsible for matters concerning that land on behalf of the entire rotinohsonni confederacy.
7. Following traditional protocol, the clan-based protocol followed during this gathering reached a consensus on vesting five members of the kahnistensera (women/mothers' fire) – kahentinetha, kawenaa, karennatha, karakwine, and kwetiio –, as well as two members of the rotiskenrakehte (men's fire) – otsitsataken and karonhiate – with the responsibility of defending the interests of the rotinohsonni confederacy and the kanien'kehá:ka nation in legal proceedings concerning the Royal Victoria Hospital and Allan Memorial Institute.
8. Following this decision, the Plaintiffs are expected to assume their duties and responsibilities as sovereign onkwehonwe in accordance with the kaianerehkó:wa.
9. It must be reminded that the plaintiffs are sovereign Indigenous people, and do not recognize the authority of Band Councils imposed by the Indian Act and the government of Canada.
10. According to Wampum 44 of the kaianerehkó:wa, the precolonial constitution of the rotinohsonni iroquois confederacy, Indigenous women are the caretakers of the land on behalf of the future generations:

*Kononkwe ne konwatsirineh ne kanakerasera. ne enkotiyatakwehnyyokeh ne onwentsa. ronnonkwe tahnnon ne konnonkwe ne enhatihserah tsiniyakotaroten ne ronwatihnistenha,*

“The lineal descent of the people of the Five Nations shall run in the female line. Women shall be considered the progenitors of the Nation. They shall own the land, and the soil. Men and women shall follow the status of their mothers”.

as appears from a copy of kaianerehkó:wa / Great Law of Peace Wampum 44, **Exhibit P-1**.

11. Given their status as the progenitors of all life on onowarekeh (turtle island) since the beginning of life on earth and as the original owners of the land following Indigenous law, the kahnistensera must give permission for anything to be done to their traditional unceded homeland.
12. It is with this understanding that we original peoples seek the assistance of the Canadian judicial system in the peaceable resolution of preventing a miscarriage of justice on our land and resolve this dispute between us and your subjects.
13. Nothing can be done on any part of turtle island without the permission of its sovereign Indigenous people, as affirmed by the central role accorded to Indigenous consent in the courts' elaboration of government responsibilities under Section 35 of the *Constitution Act, 1982*. This court is bound by the Constitution and must affirm the concerns found in section 35.

### **The Defendants and the Renovation Plans**

14. File no. 1217400001 of the City of Montreal provides for the demolition, construction, transformation of buildings, and the repurposing of the surrounding on the site of the Allan Memorial Institute, Ravenscrag gardens, and Royal Victoria Hospital (allotments 1 341 184, 1 341 185, 1 341 182, and 1 354 912), as appears from a copy of the Sommaire décisionnel in file no. 1217400001, **Exhibit P-2**.
15. McGill University has been allowed to plan a repurposing project for the site of the Royal Victoria Hospital, in a plan called “The New Vic”.
16. The Société Québécoise des Infrastructures and Stantec inc. were commissioned to explore and plan demolition, construction and landscaping work on the site of the Allan Memorial Institute and the Ravenscrag gardens, allegedly “owned” by the McGill University Health Center

17. Because the site lies within traditional rotinonshonni territory that has never been ceded or otherwise consensually transferred, the Defendants McGill University, McGill University Health Center, the City of Montreal, the Royal Victoria Hospital and the Société Québécoise des Infrastructures have illegally bought and sold stolen Indigenous property, and are thus guilty of handling.
18. The Government of Canada has funded the CIA's MK-Ultra psychiatric experiments at McGill University; has organized the genocidal Residential School System which allegedly provided Indigenous children as guinea pigs for Dr. Ewen Cameron's experiments; has allowed for unceded kanien'kehá:ka territory to be illegally stolen and handled by a variety of alleged "owners"; and it has undermined the inherent birthrights of Indigenous peoples by imposing illegitimate Band Council through the Indian Act, violating the historical nation-to-nation agreements passed between the rotinonshonni confederacy and the British Crown.

### **The Unmarked Graves and the Appearance of Right**

19. As the caretakers of thequenondah (two mountains beside each other/Mount Royal), we thus demand the immediate suspension of all reconstruction plans for the Royal Victoria Hospital and Allan Memorial Institute sites on the campus of McGill University, for the following reasons.
20. The site is unceded kanien'kehá:ka (Mohawk) territory; there is a high possibility that the site contains archaeological remains from the original precolonial Iroquoian village; the grounds of the Allan Memorial Institute must be investigated for potential unmarked graves of atrocities committed during the MK-Ultra program, between 1954 and 1963 by the CIA and Canada.
21. The kanien'kehá:ka land on which the Royal Victoria Hospital and Allan Memorial Institute sites are located are said to have first been transferred by the Sulpicians to private owner Pierre Raimbault as "concession 637" in 1708.
22. The Sulpicians have never acquired said land from the rotino'shonni:onwe (Iroquoian) peoples who have lived on this land since time immemorial.
23. Jacques Cartier first encountered our rotino'shonni:onwe ancestors in 1535 and indicated that the village of "Hochelaga" was located at thequenondah (mount royal). Given our people's practice of safeguarding the environment by moving our villages regularly throughout our territories, the village had been temporarily left to natural regeneration when Samuel de Champlain came back to the site, in 1603. When our people returned, they saw a group of strangers had moved onto our site and learned

that they called the settlement “Ville Marie”. Unable to use the land to meet regularly with Indigenous peoples from all directions of turtle island, our people renamed the location tionni'tio'tià:kon, “the place where the people separated”.

24. As no proper land deed or certificate of cession of this land has ever been shown to us, the site is considered unceded kanien'kehá:ka land, as publicly acknowledged both by McGill University and the City of Montreal.
25. Only the kanien'kehá:ka'onwe, the “people forever of the flint”, can make decisions on the use of our land, in accordance with the kaianerehkó:wa (Great Peace), our ancestral constitution which is recognised as a source of inherent rights under Section 35 of the *Constitution Act, 1982*.
26. In 1847, McGill College cashed a loan of £2000 (\$8000) from the Iroquois Trust Fund. This fund, intended to compensate for the use of aboriginal lands, was kept in trust by the Federal government under the racist pretext that Indigenous peoples were unable to manage their own funds. This sum, which built part of the McGill campus, was never paid back to the rotinonshonni confederacy. With 10% compound interest, this sum currently amounts to \$5,584,800,717, **Exhibit P-3**. Other Indian Trust Funds were also borrowed by McGill University. The Plaintiffs require the Defendant McGill University to provide all details and records of these loans and draft a reimbursement plan. This full amount must be immediately remitted to the rotinonshonni to stop the accumulation of interest which is compounded from sunrise to sunset every day.
27. As unceded kanien'kehá:ka territory, the valid legal frameworks of thequenondah are the kaianerehkó:wa, accompanied by the two historical agreements between the rotinoshionni confederacy and the British Crown: the teiohateh (two row wampum) and the Silver Covenant Chain, as appears from a copy of the Silver Covenant Chain, **Exhibit P-4**.
28. McGill campus on thequenondah is widely acknowledged as the original site of many of the precolonial iroquoian villages today referred to as “Hochelaga”.
29. The large number of precolonial Indigenous burial sites throughout the thequenondah and Royal Victoria Hospital sites demonstrates that there is a high possibility that the remains of our Indigenous ancestors lie beneath its surface, as appears from a copy of the recommendations contained in a document entitled *Étude de potential archéologique*, **Exhibit P-5**.
30. In addition to archeological remains, the kanien'kehá:ka kahnistensera have been aware of allegations that Indigenous and/or non-Indigenous children may be buried

in the vicinity of the Henry Lewis Morgan pool, and in adjacent grounds of the Ravenscrag gardens of the Allan Memorial Institute.

31. The Henry Lewis Morgan pool was built in 1961 during Dr. Ewen Cameron's unethical psychiatric experimentations on mind control, carried within the Allan Memorial Institute between 1954 and 1963, and funded by the Canadian government and the CIA's MK-Ultra project.
32. An audio taped conversation under oath with 80-year-old Winnipeg resident Lana Ponting, is one of the few remaining victims of these experiments, has confirmed several aspects of these allegations, as appears from a copy of said conversation, **Exhibit P-6**.
33. In that conversation, Lana Ponting has stressed three points:
  - 1) That Indigenous peoples were victims of these experiments, as she remembers seeing at least one Indigenous individual receiving intense shock treatment in the Allan Memorial Institute during her stay, in April 1958;
  - 2) That underaged children were victims of these experiments, as Lana Ponting witnessed many minor individuals in the building, and as she was herself 16 years old at the time. It is also public knowledge that several MK-Ultra sub-projects included psychiatric experiments on unwitting children (Sub-projects 102, 103, 177, and 122), as appears from a copy of an article published in the British Journal of Psychiatry in 1995, **Exhibit P-7**;
  - 3) That the rumour that the experiments' victims were buried in the Ravenscrag gardens surrounding the Allan Memorial Institute was already in circulation amongst its patients as early as 1958. Notably, Lana Ponting recalls that suspicious activities were conducted outside the building at night.
34. Lana Ponting and many other family members of those subject to psychiatric experiments at McGill University have strong suspicions that unmarked graves, potentially including Indigenous children, will be uncovered beneath the grounds of Ravenscrag.
35. The kanien'kehá:ka caretakers of thequenondah take these allegations very seriously. Indigenous children who were kidnapped from their families and put in Residential Schools were legally deemed "wards" of the State of Canada. Given this status, many of these children were used for experiments, including on nutrition and starvation, as appears from a copy of the statement of claim in the case of *Jean John*

*Baptiste Pambrun vs. The Attorney General of Canada* bearing court file number QBG 1359/18, **Exhibit P-8**. A newspaper clip from 1953 also features Dr. Ewen Cameron announcing research on children bearing early symptoms of “mental illness”, **Exhibit P-9**.

36. It must also be noted that before coming to the Allan Memorial Institute, Dr. Ewen Cameron practiced psychiatry in Brandon, Manitoba, where he likely had access to Indigenous patients.
37. Another important fact bolstering our suspicions is that underage Duplessis Orphans, who had a similar status as Indigenous children in Residential Schools (e.g. “wards of the State”), were subjected to extreme psychiatric torture experiments in psychiatric wards. Many died and were interred in unmarked graves, including numerous human remains found in the pigsty near St-Jean-de-Dieu hospital, in Montreal, as appears from a copy of an article published in the Journal de Montréal on May 11 1999, **Exhibit P-10**.
38. Electroshock torture was also practiced on children in residential schools, as revealed by the Ontario Provincial Police’s inquiry on Fort Albany’s St Anne’s Residential School, as appears from a copy of an article published in The Globe and Mail on October 21 1996, **Exhibit P-11**.
39. A zone potentially containing unmarked graves has been identified on a map, **Exhibit P-12**.
40. Before unmarked graves of Indigenous children were actually found across Canada, the widely circulated stories of their existence among Indigenous peoples were dismissed as rumors.
41. When the Plaintiffs notified the Office de consultation publique de Montréal of the allegations of unmarked graves in the Ravenscrag gardens, the Société Québécoise des Infrastructures wrote a letter to the Band Councils of Kahnawake and Kanehsatake to exchange information on the subject, **Exhibit P-13**. The Plaintiffs remind the Defendants that Indian Act Band Councils should not be involved in this process as they are funded by the Government of Canada and are thus in a conflict of interest.

### **Serious and Irreparable Prejudice**

42. The Plaintiffs and their community will suffer irreparable harm, not compensable in damages, if the projected demolition, construction, transformation of buildings, and



the repurposing of the surrounding on the site of the Allan Memorial Institute, Ravenscrag gardens, and Royal Victoria Hospital take place.

43. The kanien'kehá:ka kahnistensera, careholders of thequenondah are concerned that the current Royal Victoria Hospital and Allan Memorial Institute rehabilitation project could destroy evidence of the unmarked graves of their siblings, depriving them of proper identification, repatriation and burial.
44. As their heirs, it is our duty to determine how these crucial archeological sites will be treated in any change to the thequenondah site.
45. It is an extreme offence to disturb our ancestors.

### **Emergency Treatment**

46. This matter must be dealt with immediately given the urgency of the situation. Municipal rules and regulations allowing demolition and construction work are announced to come into effect during the Spring and Summer of 2022, as shown in a document entitled “Synthèse de l’encadrement réglementaire”, **Exhibit P-14**. An injunction must be granted on an interlocutory basis to ensure that demolition and construction work do not result in the destruction of unmarked graves, which would also constitute destruction of evidence of criminal activity by the Defendants and aviolation of rotinohsonni jurisdiction on the land.

### **Remedies Sought**

47. Through reimbursing stolen Iroquois Trust Funds and Indian Trust Funds, it is the responsibility of McGill University and the Attorney General of Canada to provide the resources necessary for an immediate and thorough kanien'kehá:ka-led investigation of the Allan Memorial Institute site, which must be considered a site of crimes against humanity.
48. All files concerning MK-Ultra experiments conducted in McGill University’s Allan Memorial Institute, its adjoining stables and the Ravenscrag Gardens must be released without delay and made available to the public without restriction.
49. According to Calls to Action 71 to 76 of the Truth and Reconciliation Commission, recovering unmarked graves of Indigenous children is a top priority for the state of Canada to avoid continuously carrying out crimes against humanity.

50. Before any construction can take place, the site must be thoroughly investigated by a kanien'kehá:ka-led forensic and archaeological team to confirm the existence of unmarked graves or other evidence of unlawful activity.

**Exemption to Provide a Suretyship**

51. Considering the standing of the Plaintiffs and the nature of the issues which are of public interest, the Plaintiffs request to be exempted from the suretyship provided in s.511 C.C.P.

**FOR THESE REASONS, MAY IT PLEASE THE COURT:**

**GRANT** this Application;

**ON AN INTERLOCUTORY BASIS:**

**ORDER** the Defendants Société québécoise des infrastructures, McGill University, Ville de Montreal and Stantec inc. to stop the renovation plans of the Royal Victoria Hospital and Allen Memorial psychiatric hospital site.

**ORDER** the Defendants McGill University and the Attorney General of Canada to provide funds for a forensic and archeological investigation of the Allan Memorial and Ravenscrag Gardens to be carried out by an independent investigation team led by the kahnistensera and MK-Ultra survivors;

**EXEMPT** the Plaintiffs from providing a suretyship;

**MAKE ANY OTHER ORDER** the Court considers appropriate;

**ON THE MERITS OF THE CASE:**

**DECLARE** that Defendants McGill University, McGill University Health Center, the City of Montreal, the Royal Victoria Hospital and the Société Québécoise des Infrastructures have illegally bought and sold stolen Indigenous property;

**DECLARE** that thequenondah (Mount Royal) is the inalienable land of the traditional kanien'keha:ka people, whose caretakers are the kahnistensera, whose permission must be sought for everything concerning the land;

**DECLARE** that the kahnistensera are the only representatives of the traditional kanien'kehá:ka people following the kaianerehkó:wa. As agents of the Government

of Canada, Mohawk Band Councils should not be involved in any way in the current process, as they are in conflict of interest;

**DECLARE** that the Defendants McGill University and the Attorney General of Canada have funded and conducted crimes against humanity through the MK-Ultra program, whose use of unwitting patients violated the Nuremberg Code, and conducted genocide by targeting Indigenous children funneled through Residential Schools;

**ORDER** the Defendants Société québécoise des infrastructures, McGill University, Ville de Montreal and Stantec inc. to stop the projected demolition, construction, transformation of buildings, and the repurposing of the surrounding on the site of the Allan Memorial Institute, Ravenscrag gardens, and Royal Victoria Hospital (allotments 1 341 184, 1 341 185, 1 341 182, and 1 354 912), proposed by the City of Montreal in file no. 1217400001;

**ORDER** all legal costs and costs of archeological and forensic investigations to be borne by the Defendants;

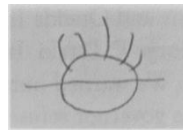
**ORDER** the Defendants McGill University, the Royal Victoria Hospital, the McGill University Health Center and the Attorney General of Canada to release all files concerning medical experiments conducted on Indigenous peoples and make them available to the public;

**ORDER** the Defendants McGill University, City of Montreal, Société Québécoise des Infrastructures and the Attorney General of Canada to provide the records and details of all funds borrowed to the Iroquois Trust Fund and the general Indian Trust Fund, as well as provide a reimbursement plan of these monies plus compounded interests to the appropriate Indigenous peoples, following their traditional protocols;

**MAKE ANY OTHER ORDER** the Court considers appropriate;

**WITH COSTS.**

Kahnawake, March 25th, 2022



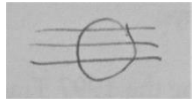

---

KAHENTINETHA  
Plaintiff



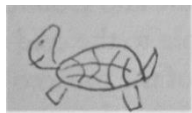
---

KAWENAA  
Plaintiff



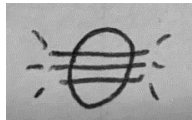
---

KARENNATHA  
Plaintiff



---

KARAKWINE  
Plaintiff



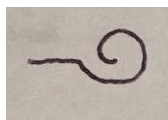
---

KWETIIO  
Plaintiff



---

OTSITSATAKEN  
Plaintiff



---

KARONHIATE  
Plaintiff

P.O. Box 991, Kahnawake, Quebec, J0L 1B0  
Email : [kahnistensera@riseup.net](mailto:kahnistensera@riseup.net)

CANADA

**SUPERIOR COURT**  
**(Civil Division)**

---

**PROVINCE OF QUEBEC**  
**DISTRICT OF MONTREAL**

**No.: 500-17**

**KAHENTINETHA**

- and -

**KAWENAA**

- and -

**KARENNATHA**

- and -

**KARAKWINE**

- and -

**KWETIIO**

- and -

**OTSITSATAKEN**

- and -

**KARONHIATE**

**Plaintiffs**

v.

**SOCIÉTÉ QUÉBÉCOISE DES**  
**INFRASTRUCTURES**

- and -

**ROYAL VICTORIA HOSPITAL**

- and -

**MCGILL UNIVERSITY HEALTH CENTER**

- and -

**MCGILL UNIVERSITY**

- and -

**VILLE DE MONTRÉAL**

- and -

**STANTEC INC.**

- and -

**ATTORNEY GENERAL OF CANADA**

**Defendants**

---

**AFFIDAVIT OF KAHENTINETHA, KAWENAA, KARENNATHA, KARAKWINE,**  
**KWETIIO, OTSITSATAKEN AND KARONHIATE**

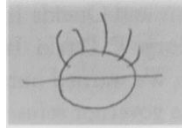
---

We, kahentinetha, kawenaa, karennatha, karakwine, kwetiio, otsitsataken and karonhiate, with residential addresses in Kahnawake kanien'kehá:ka territory, MAKE OATH AND SAY THAT:

1. We make this affidavit in support of this application according to our rights as the true original people of turtle island. We have personal knowledge of the facts deposed to in this affidavit to be true, except where stated to be based on information and belief, in which case we believe those facts to be true.
2. We are the progenitors of the soil of turtle island. We and our ancestors never ceded any part of turtle island which is acknowledged by McGill University and the City of Montreal.
3. We fear serious crimes may have been committed on our land known as 'mount royal', such as the fatal experiments conducted on our children through the CIA's MK-Ultra program in the Allan Memorial Institute. We want a full investigation by professional scientists under the guidance of the kahnistensera (women's fire).
4. We have complied with the constitution of turtle island to caretake all living things, below, on and above our mother earth. Canada and all its institutions acknowledge that we own turtle island.
5. We request that McGill University and its allied institutions cease and desist their destruction of our land for which we have never given permission.
6. We indicate that the Defendants have bought and sold stolen Indigenous property.
7. We swear that we have never seen or know of any documents that indicate that we have sold or transferred our land as it belongs to the future generations and we are the caretakers for them.
8. We are the decision-makers and caretakers of all turtle island. All settler colonists have to get the valid permission of the true natural people placed here by creation to do anything on our land.
9. Mount royal is a kanien'kehá:ka burial ground. We never conceded jurisdiction. Only Indigenous people have jurisdiction on turtle island. All corporations and institutions must immediately cease and desist all activities on any of our land that does not have the valid permission of the original traditional people who live by the natural ways of creation.

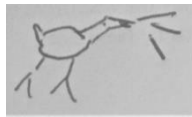
10. The kaianerehkó:wa is an eternal quest for us to rid ourselves of greed and impure thoughts, and we want our inherent rights that all must live in peace to according to the kaianerehkó:wa, great peace.

11. We wish to peacefully take back jurisdiction of this said property that has been stolen. This court of the colonial settlers adhere to the kaianerehkó:wa.



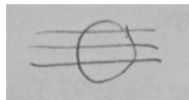
---

KAHENTINETHA



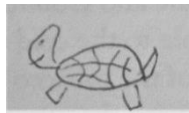
---

KAWENAA



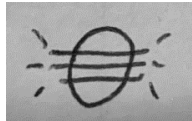
---

KARENNATHA



---

KARAKWINE



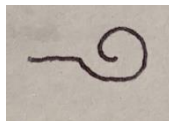
---

KWETIIO



---

OTSITSATAKEN



---

KARONHIATE

SWORN BEFORE ME at the city of  
Montreal, Province of Quebec  
This 25th day of March 2022

---

Notary and Commissioner for the  
For the Province of Quebec



**SUMMONS**  
(articles 145 and following C.C.P.)

Take notice that the plaintiff has filed this originating application in the office of the court of Montreal in the judicial district of Montreal.

You must answer the application in writing, personally or through a lawyer, at the courthouse of Montreal situated at 1, Notre-Dame Street E., Montreal, province of Quebec, H2Y 1B6 within 15 days of service of the application or, if you have no domicile, residence or establishment in Québec, within 30 days. The answer must be notified to the plaintiff's lawyer or, if the plaintiff is not represented, to the plaintiff.

If you fail to answer within the time limit of 15 or 30 days, as applicable, a default judgement may be rendered against you without further notice and you may, according to the circumstances, be required to pay the legal costs.

In your answer, you must state your intention to:

- negotiate a settlement;
- propose mediation to resolve the dispute;
- defend the application and, in the cases required by the Code, cooperate with the plaintiff in preparing the case protocol that is to govern the conduct of the proceeding. The protocol must be filed with the court office in the district specified above within 45 days after service of the summons or, in family matters or if you have no domicile, residence or establishment in Québec, within 3 months after service;
- propose a settlement conference.

The answer to the summons must include your contact information and, if you are represented by a lawyer, the lawyer's name and contact information.

You may ask the court to refer the originating application to the district of your domicile or residence, or of your elected domicile or the district designated by an agreement with the plaintiff.

If the application pertains to an employment contract, consumer contract or insurance contract, or to the exercise of a hypothecary right on an immovable serving as your main residence, and if you are the employee, consumer, insured person, beneficiary of the

insurance contract or hypothecary debtor, you may ask for a referral to the district of your domicile or residence or the district where the immovable is situated or the loss occurred. The request must be filed with the special clerk of the district of territorial jurisdiction after it has been notified to the other parties and to the office of the court already seized of the originating application.

If you qualify to act as a plaintiff under the rules governing the recovery of small claims, you may also contact the clerk of the court to request that the application be processed according to those rules. If you make this request, the plaintiff's legal costs will not exceed those prescribed for the recovery of small claims.

Within 20 days after the case protocol mentioned above is filed, the court may call you to a case management conference to ensure the orderly progress of the proceeding. Failing this, the protocol is presumed to be accepted.

- EXHIBIT P-1** kaianerehkó:wa / Great Law of Peace Wampum 44 – women as progenitors of the soil. The Inherent Right of the Haudenosaunee to Criminal Justice Jurisdiction in Canada: a Preliminary Inquiry. Ph D Thesis, Michael R Cousins, School of Criminology, Simon Fraser University. 2003, p. 163
- EXHIBIT P-2** Ville de Montréal, Sommaire décisionnel file no. 1217400001
- EXHIBIT P-3** Land Rights: A Global Solution. Six Nations Lands & Resources Department
- EXHIBIT P-4** Silver Covenant Chain, nation-to-nation relationship with the British Crown
- EXHIBIT P-5** Recommandations. Site de l'hôpital Royal Victoria, étude de potentiel archéologique. Arkéos. 2016, pp. 71-72
- EXHIBIT P-6** Testimony from MK-Ultra survivor Lana Ponting
- EXHIBIT P-7** MK-Ultra experiments on children. British Journal of Psychiatry 167. 1995, pp. 263-264
- EXHIBIT P-8** Nutritional experiments in Indian Residential Schools. Statement of Claim. Jean John Baptiste Pambrun vs. The Attorney General of Canada, Court of Queen's Bench for Saskatchewan, Court File Number QBG 1359/18, pp.7-13
- EXHIBIT P-9** Research for the mentally ill. La Patrie, December 30, 1953

**EXHIBIT P-10** Human remains found in the pigsty near St-Jean-de-Dieu hospital, in Montreal. Journal de Montréal, May 11 1999

**EXHIBIT P-11** Electroshock torture practiced on children in Fort Albany's St Anne's Residential School. The Globe and Mail, October 21 1996

**EXHIBIT P-12** Zone allegedly containing unmarked graves. Geoview Pro

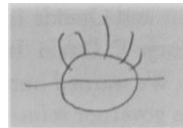
**EXHIBIT P-13** Letters from the SQI to the Band Councils of Kahnawake and Kanehsatake dated November 9, 2021.

**EXHIBIT P-14** Synthèse de l'encadrement réglementaire, by the Arrondissement de Ville-Marie, Ville de Montreal, dated August 2021.

These exhibits are available on request.

If the application is an application in the course of a proceeding or an application under Book III, V, excepting an application in family matters mentioned in article 409, or VI of the Code, the establishment of a case protocol is not required; however, the application must be accompanied by a notice stating the date and time it is to be presented.

Kahnawake, March 25th, 2022



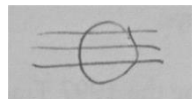
---

**KAHENTINETHA**  
Plaintiff



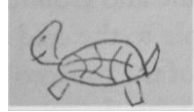
---

**KAWENAA**  
Plaintiff



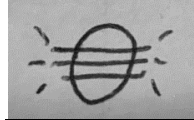
---

**KARENATHA**  
Plaintiff



---

KARAKWINE  
Plaintiff



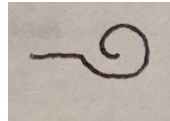
---

KWETIIO  
Plaintiff



---

OTSITSATAKEN  
Plaintiff



---

KARONHIATE  
Plaintiff

P.O. Box 991, Kahnawake, Quebec, J0L 1B0  
Email : [kahnistensera@riseup.net](mailto:kahnistensera@riseup.net)

CANADA

**SUPERIOR COURT  
(Civil Division)**

---

**PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL**

**No.: 500-17**

**KAHENTINETHA**

- and -

**KAWENAA**

- and -

**KARENATHA**

- and -

**KARAKWINE**

- and -

**KWETIO**

- and -

**OTSITSATAKEN**

- and -

**KARONHIATE**

**Plaintiffs**

v.

**SOCIÉTÉ QUÉBÉCOISE DES  
INFRASTRUCTURES**

- and -

**ROYAL VICTORIA HOSPITAL**

- and -

**MCGILL UNIVERSITY HEALTH CENTER**

- and -

**MCGILL UNIVERSITY**

- and -

**VILLE DE MONTRÉAL**

- and -

**STANTEC INC.**

- and -

**ATTORNEY GENERAL OF CANADA**

**Defendants**

---

---

**NOTICE OF PRESENTATION  
CIVIL PRACTICE  
(ROOM 2.16)**

---

---

## 1. PRESENTATION OF THE APPLICATION

**TAKE NOTICE** that the *Originating Application for Declaratory Relief and to Obtain an Interlocutory and a Permanent Injunction* shall be presented in the Civil Practice Division of the Superior Court, in room 2.16 of the Montréal Courthouse situated at 1, Notre-Dame Street East, Montréal, the \_\_14<sup>th</sup> day of April \_\_\_\_\_ 2022, at 9:00 a.m., or as soon as counsel may be heard.

## 2. HOW TO JOIN THE VIRTUAL CALLING OF THE ROLL IN PRACTICE DIVISION

The coordinates to join the calling of the roll in room 2.16 are as follows:

a) **Using Teams:** to open the permanent link established for room 2.16, click here;<sup>1</sup>

You must then fill in your name and click “Join Now”. In order to facilitate the process and the identification of the parties, we invite you to fill in your name in the following manner:

Attorneys: Mtre. Name, Surname (name of the party being represented)

Parties not represented by an attorney: Name, Surname (specify: Plaintiff, Defendant or other)

For persons attending a public hearing: you can simply indicate “public”.

b) **By telephone:**

Canada (Toll free number): (833) 450-1741

Canada, Québec (Charges will apply): +1 581-319-2194

Conference ID: 470 980 973#

c) **By videoconference:** [teams@teams.justice.gouv.qc.ca](https://teams@teams.justice.gouv.qc.ca)

VTC Conference ID: 1197347661

d) **In person**, if and only if the above-mentioned means are not available.

## 3. FAILURE TO ATTEND THE calling of the roll in practice division

**TAKE NOTICE** that should you fail to attend the calling of the roll, a judgment by default could be rendered against you, without further notice or delay.

---

<sup>1</sup> The permanent links for the Montreal courthouse rooms can also be found in the document entitled Liens TEAMS pour rejoindre les salles du Palais de justice de Montréal en matière commerciale, civile et familiale under the heading Audiences virtuelles found on the Superior Court of Québec website at : [https://coursuperieureduquebec.ca/fileadmin/cour-superieure/Audiences\\_virtuelles/Montreal\\_Teams\\_Codes\\_-\\_Superior\\_Court\\_-\\_Commercial\\_civil\\_and\\_family\\_divisions\\_Ang\\_.pdf](https://coursuperieureduquebec.ca/fileadmin/cour-superieure/Audiences_virtuelles/Montreal_Teams_Codes_-_Superior_Court_-_Commercial_civil_and_family_divisions_Ang_.pdf).

**4. OBLIGATIONS**

4.1 Duty of cooperation

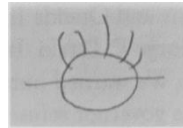
**TAKE NOTICE** that you are duty-bound to co-operate and, in particular, to keep one another informed at all times of the facts and particulars conducive to a fair debate and to make sure that relevant evidence is preserved. (*Code of Civil Procedure*, art. 20).

4.2 Dispute prevention and resolution processes

**TAKE NOTICE** that before referring your dispute to the courts, you must consider private dispute prevention and resolution processes which are negotiation between the parties, and mediation and arbitration, in which the parties call on a third person to assist them (*Code of Civil Procedure*, art. 1 and 2).

**PLEASE GOVERN YOURSELF ACCORDINGLY.**

Kahnawake, March 25th, 2022



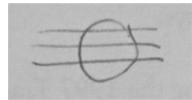
---

**KAHENTINETHA**  
Plaintiff



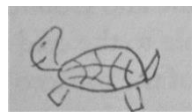
---

**KAWENAA**  
Plaintiff



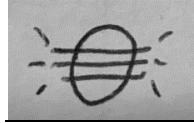
---

**KARENNATHA**  
Plaintiff



---

**KARAKWINE**  
Plaintiff



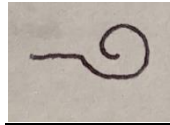
---

KWETIIO  
Plaintiff



---

OTSITSATAKEN  
Plaintiff



---

KARONHIATE  
Plaintiff

P.O. Box 991, Kahnawake, Quebec, J0L 1B0  
Email : [kahnistensera@riseup.net](mailto:kahnistensera@riseup.net)