

AFFIDAVIT

I, [REDACTED], of the city of MISSION, in the province of British Columbia, in the country of CANADA, do AFFIRM that:

1. My name is [REDACTED], my date of birth is [REDACTED] and I am a life-sentenced Canadian prisoner of Indigenous decent (Algonquin). I have been incarcerated without exception since [REDACTED], 1994, and I am currently being detained in Mission Medium Security Institution. My finger print service number [REDACTED]
2. As an Indigenous Canadian I am a very spiritual person. I express my love for my Creator through the teachings of the Bible. I am a devout Christian and a member in good standing of the Christian Congregation of Jehovah's Witnesses since my baptism, conducted inside Kent Maximum Security Institution in Agassiz, British Columbia, Canada on April 12, 1997.
3. I am also a married man with children and a grandchild. I was married in a Christian ceremony in the chapel at Kent Institution (the same as above) on February 28, 1999. My wife's name [REDACTED] and she too is a devout Christian and a loyal and faithful member of the Christian congregation of Jehovah's Witnesses, I believe.

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4. [REDACTED] and I have been faithfully married to each other for more than 21 years, all of it with me incarcerated. One of the things that keeps our marriage and our friendship strong and vital is our spiritual relationship with each other and our Creator. Since at least [REDACTED] and I have done our very best to worship our God, whom we call "Jehovah", together as a family. This worship has occurred in the visiting room(s) and over the telephone from maximum and medium security facilities. This worship involves both prayer and Bible study, which I lead as the spiritual "head" of my family. For more than 15 years it has been our practice to have a daily reading and discussion from a Bible-based booklet called "Examining the Scriptures Daily," published by Jehovah's Witnesses. This is followed by prayer. This form of worship is at the core of our family unity and takes place every day over the telephone from the prison. It helps me to endure my incarceration, and as an Indigenous person practicing Christianity, this religious practice is an identified feature of my culture and background. It is identified as part of my "Aboriginal Social History" and part of my Correctional Plan and part of my Indigenous "healing plan"; all of which has been / is in accordance with sections 4(g) and 4(h), section 15.1 and section 79.1 of the

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Corrections and Conditional Release Act, according to my belief and understanding. (See attached, Correctional Plan Update, CSC, [REDACTED] [REDACTED])

13. *Praying mantis* 3; 15 → 13; 15 → 13; 15 → 13; 15 → 13;

5. As I stated earlier, above, I am also a parent, and a grand parent. My son, [REDACTED], and his wife [REDACTED] and their daughter [REDACTED] live in [REDACTED], B.C., approximately a [REDACTED] drive from Mission Institution where I am incarcerated, and approximately [REDACTED] minutes from my wife [REDACTED] dwelling in [REDACTED]. She is currently 2 years and 8 months old. She has been to the Mission medium Security Institution twice with her parents to visit me. I have now not seen her physically since February, 2020. She calls me "Pappi". I miss holding her and hugging her very much. (See attached, Correctional Plan Update, CSC, [REDACTED] at [REDACTED], [REDACTED])

6. Very importantly, I am also the first-born and only son of an Indigenous (Algonquin) Canadian mother. Her and my father are also what I would call devout Christians, and practice their worship of the Creator as Jehovah's Witnesses. For more than 25 years, during all of my incarceration, my mother and father have supported me

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Morally, spiritually, physically, and financially. In my opinion, they have never wavered. They were in attendance at my baptism in 1997, and at my wedding to [REDACTED] in 1999. They fully supported [REDACTED] and her children [REDACTED] from 1998 forward until today. When I transferred from a British Columbia CSC medium security prison to a medium security prison in Cowansville, Quebec to more fully follow my Indigenous healing plan and my CSC Correctional Plan in December, 2010, my parents were a tremendous source of moral, emotional and financial support to my wife [REDACTED] and me. They provided financial and spiritual support for my wife [REDACTED]'s move to Cowansville, Quebec in May, 2011. They assisted her in the purchase of a new vehicle when she arrived in Quebec. And then, beginning in July, 2011, both my mother and father travelled from their home in [REDACTED], British Columbia, Canada to Cowansville, Quebec, Canada — approximately 2,600 miles one way — specifically to visit with and encourage my wife [REDACTED] and me. They would spend between 3 and 6 days living right inside the prison with me and my wife in a program called "Private Family Visits" (PFV's). The PFV program consists of an apartment-style structure where a prisoner can visit for 72 - 144 hours with his family in private. The prisoner or his family must provide their own food and medication for this program.

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7. From July, 2011 to May, 2018, my mother and father travelled from [REDACTED] to Cowansville, paying for their own airfare and vehicle rental and hotel(s), plus paying for all the food for my wife and I and themselves during the PFV. My parents are now 75 years old (my father) and 73 years old (my mother). My father suffers from acute arthritis and requires pain-management medication and special orthopedic clothing to manage his arthritis. My mother has a fused spine and an artificial knee. She only manages to move around with pain-management medication. When my parents come to the PFV program, no medication is permitted to come into the prison with them. They are only permitted to come to the front of the prison twice daily to obtain their medication, and often the effects of that medication wear off before an officer is able to escort them to a place to take that medication. It is very emotionally painfull to watch my parents suffer physically when we are together in the PFV program. Yet they have continued to come and they have told me repeatedly that they come because they love me and they want to be with me. (See attached Correctional Plan Update, CSC, [REDACTED] at page 15 [REDACTED] paragraph [REDACTED]. I love my parents truly and deeply, and I believe that they love me very much. For more than 25 years they have been at the center of my life.

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8. The information I attest to in the paragraphs 1-7, above are provided in great detail so that readers of this affidavit might understand the depth and specificity of the emotional, psychological and spiritual pain and suffering that I have/ and do experience as a direct result of the isolation/ segregation I have undergone at Mission Medium Security Institution from April 2, 2020 to April 8, 2020, and then from April 17, 2020 to June 25, 2020, or a total of 77 days. Since April 2, 2020, the only time that I have not been in isolation/ segregation conditions at Mission Medium Security Institution is from 11:00 a.m on April 8, 2020 , when I left Mission Institution in the back of an ambulance , until approximately 5:00 pm on April 17, 2020 , when I was returned to Mission Institution after being released from the Intensive Care Unit and critical care unit(s) of the Abbotsford Regional Hospital, where I was treated for pneumonia resulting from a COVID-19 infection . (see attached, medical documentation, [REDACTED], [REDACTED], [REDACTED], [REDACTED])

[REDACTED] During my 10 day stay in the ICU/ critical care unit at Abbotsford Regional Hospital, I was in isolation/quarantine for treatment of COVID-19 infection, and I was also in leg shackles 24-hours per day, for the entire 10 day period.

q. Besides the emotional, psychological, spiritual and physical pain I have experienced due to my isolation / segregation since April 2, 2020, I have also experienced legal prejudice against my Correctional Plan and my access to legal counsel and the courts, I believe. I also believe that the lockdown / segregation I have experienced at Mission Medium Security Institution has prejudiced my ability to practice my religious form of worship as an Indigenous Christian and one of Jehovah's Witnesses. And finally, I firmly believe that my continual isolation / segregation has prejudiced my ability to prepare for and obtain conditional release from prison, by restricting my access to my Institutional Parole Officer, [REDACTED], [REDACTED] and the Indigenous elder, [REDACTED], as well as access to a fair, and accurate psychological risk assessment in preparation for my August, 2020 "Elder-assisted" parole hearing in front of the Parole Board of Canada. I will now testify to my suffering and the prejudice I believe I have experienced as a result of my isolation / segregation at Mission Medium Security Institution since April 2, 2020 until the date that this affidavit is assermented. I will testify to this suffering / prejudice topically, under the subheadings, "physical suffering / prejudice", "spiritual and religious prejudice / suffering", "psychological prejudice / suffering", and "legal prejudice".

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10. Physical suffering / prejudice:

On Monday, March 30, 2020, I reported to the Mission Medium Security Institution Health Care Unit to self-report what I believed were symptoms of COVID-19 infection. I had a severe respiratory cough and a migraine headache as well as body pain in my arms and a diminished appetite. I was examined by an older nurse named [REDACTED], who was not wearing any personal protective equipment that I could see. She came right up next to me and took my temperature with a mouth thermometer and listened to my breathing through a stethoscope. I was coughing openly as I could not cover my mouth while she was listening to my chest with a stethoscope. [REDACTED] was not wearing either a mask or gloves during this examination.

11. Afterwards, she told me that I did "not have COVID-19"; because, as she stated, I "did not have a fever." She then told me to wait for a clerk from the health care department who had some new eyeglasses for me. A woman came and gave me my glasses and had me sign a receipt that she said would be placed on my permanent health care file. We stood within 3 or 4 feet from each other and shared a pen. I was coughing openly and she wore no mask or gloves.

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12. I specifically asked [REDACTED] for a medical authorization for the ability to pick up my meals in "take out" form from the inmate dining room. I asked this authorization because [REDACTED] had also told me that what I had was "just a bad cold" and that "8 or 9 of the guys have it here!" She then told me that I didn't need to take my meals out of the 200-person inmate dining but that I just go to the scheduled meal and eat with everyone else." Following her advice, I did, and tried my best to stay away from others because I didn't want to give anyone my "bad cold".
13. After attending the 4:30 pm meal at the inmate cafeteria on March 30, 2020 though, I just felt sicker and sicker. I tried to eat, but I just couldn't. I had a continual migraine headache and body pains that mostly kept me confined to bed. The only exception was to shower and to talk to my wife, my parents on the phone, and to visit my fellow prison [REDACTED] (twice) to have a prayer. [REDACTED] is also one of Jehovah's Witnesses, and is housed [REDACTED] at Mission Medium Security Institution.
14. I spent almost all of April 1st, 2020 in bed, and felt very sick, mostly with severe respiratory cough, a migraine headache and severe body pain. I could barely eat or drink.

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15. On April 2, 2020, my cell door was locked, and it was announced the following day that "inmates" had tested positive for COVID-19. A memo was put under my door, from the Institutional Head, ██████████, stating that "in order to prevent further spread, we will be keeping all offenders at the medium or isolation in their cells until the rest of the tests come back".

16. From April 2, 2020 until April 6, 2020 I was locked in my cell 24-hours per day with no access to a shower, outside exercise, or a telephone to call my family or my legal counsel, ██████████. During this time the nurse came to my cell once per day. She told me to "get lots of rest and drink lots of water" to help me get over my "bad cold". I repeatedly asked for the nurse to tell the doctor that I needed "Imatrex" and a "puffer" for my cough/breathing. The drug "Imatrex" is a treatment that is used for migraine headaches, and I have been prescribed it before by CSC employee and ask the doctor to send me the medication I needed. Between April 2, 2020 and April 8, 2020, the only thing the nurse did was check my temperature two or three times and bring me some Tylenol. It was mostly the same nurse every day - a short woman.

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17. During the time period from April 2, 2020, to April 8, 2020, the staff in block 6 only brought me solid food and I could not eat it. I told them I was very sick and could not eat solid food. I asked [REDACTED] if there was any way to get me some soup. Later, near the 6th or 7th of April, 2020, [REDACTED] from [REDACTED] told me that she had phoned the Mission medium Security Institution Kitchen staff and that "they don't have any soup". To the best of my recollection, I did not eat between April 1, 2020 and April 8, 2020.

18. On April 6, 2020 we were told that the [REDACTED] inmates would be permitted out of our cells for 10-minutes that day. We were to have access to the phone for 5 minutes and the shower for 5 minutes. I used the shower first and the inmate in the cell next to me used the phone. After only 5 minutes we switched. I phoned my wife and we said a prayer together on the phone. It would be the last time I would be able to use the block [REDACTED] telephones in Mission medium Security Institution again for 11 (eleven) more days.

19. On April 8, 2020, the same short, [REDACTED] came to my cell door and asked me "how are you feeling". I told her I could not breathe and I needed medical attention. She checked my temperature again and this time she also tested my oxygen

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saturation levels (oxsat). She said that my oxsat level was 73% and she told the nurse that was with her to "run and bring oxygen". She [REDACTED] [REDACTED] nurse) then took me out of my cell, and had me sit on a chair in the hallway outside. With the exception of the 10-minute "shower and phone routine" on April 6, 2020, this was the first time I had been permitted out of my cell since April 2, 2020, seven days prior.

20. At approximately 11:00 A.M on April 8, 2020, I was attended to by paramedics in the block [REDACTED] of Mission Medium Security Institution. They put me on a stretcher and then into the back of an ambulance. Two correctional officers got in with me and one of them placed hand cuffs and shackles on me. The paramedics placed me on supplemental oxygen and put a mask over my face (PPE).

21. First I was taken to Mission Regional Hospital, where I was tested by nasal swab for COVID-19. Then I was transferred by ambulance to Abbotsford Regional Hospital and admitted to the Intensive Care Unit, again, on April 8, 2020. (See attached, medical documentation, Abbotsford Regional Hospital, April 8, 2020 to April 17, 2020). The officers that were escorting me took the handcuffs off, but left the shackles on.

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22. On or about April 9, 2020, due to severe COVID-19 infection, I soiled my clothing and the bed I was in in ICU. Because I was shackled, I had to lay there in my own feces until the CSC officer eventually came to the room and undid the shackles for long enough that I could take my sweat pants off. I felt humiliated. The shackles were put back on immediately and I was unable to clean myself properly for a few more hours.
23. After 8 more days I was discharged from the ICU at Abbotsford Regional Hospital on April 17, 2020 at approximately 5:00 pm. Because my clothing was soiled in my feces, I was required to wear a hospital gown (which did not adequately cover my bare genitals or buttocks) and was then handcuffed and required to walk through the hospital entrance, filled with citizens, in a state of bare nakedness and full restraints (handcuffs and shackles). I was then required to stand outside the hospital in this condition for 3-5 minutes went and retrieved the transport vehicle. While it was embarrassing, and undignifying, I was happy to be outside in fresh air for the first time in more than 17 days.

24. When the transport vehicle arrived back at Mission Medium Security Institution, the escort officer removed my restraints. It was the first time I

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had been without shackles around my ankles since the humiliating incident in ICU. I was then required to walk approximately 300 yards from the front gate at Mission Medium Security Institution down to block [REDACTED] in a state of semi-nakedness, covered only by a loose-fitting hospital gown. I was met at the entrance to block [REDACTED] by [REDACTED], who is a female correctional officer. Though I feel that she was kind to me that day, it was still very embarrassing to be unclothed like that, especially in front of a female officer.

25. Once I entered block [REDACTED], I was permitted to shower, use the phone, and clean the spoiled, uneaten food out of my cell that had accumulated there from April 2 - 8, 2020. It was the first time CSC had permitted me to phone my family or contact legal counsel in 11 days. I will testify more on this topic in the following sub-headed segment of this affidavit.

26. Between April 17, 2020 and June 2, 2020, I was locked in my cell in block 6 of Mission Medium Security Institution for 23 and a half hours per day of isolation/segregation. The only outside yard time I was permitted was once per week for 45 minutes, starting on May 6, 2020. This was very hard on me psychologically and physically.

15

27. On June 2, 2020, the staff in block [REDACTED] of Mission Medium Security Institution started permitting me out of my locked cell for "an extra 15 minutes for phone and showers". This meant that I was now "only confined" to my cell for 23 hours and 15 minutes per day. On this same day, CSC increased my (our) outdoor exercise time to 4 periods of 60 minutes per period.

28. Since I came home from the ICU of the Abbotsford Regional Hospital, I have been losing hair literally "by the handful". I have been seen by the doctor about this twice, and all he can think of is that it is stress-related. I sleep only 3 or 4 hours a night now, when before this segregation / isolation experience, I was a solid 7 - 7½ hour per night sleeper. The doctor started me on a prescription of "Trazodone", described as a "heavy anti-depressant" and a hypnotic (sleep-aid). I'm still losing hair like I've been irradiated.

29. I am now 53-years-old and also suffer from my parents' disease: chronic osteo-arthritis. (See attached Correctional Plan Update, CSC, [REDACTED] paragraph [REDACTED]). Being confined to my cell for more than 23 hours per day for the past two months has exacerbated my arthritis considerably, and required me to increase my use of "Naproxen 500 mg." - a very strong anti-

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inflammatory that has increasingly negative side-effects on the liver and the stomach lining, according to pharmaceutical information sheets I have received from the Mission Medium Security Health Care Department. Therefore I try to not use it every day, and the days I don't, I am in severe physical pain. I believe that this is due to confinement in my cell and lack of significant physical movement.

30. On May 14th, 2020, there was an announcement posted on the Mission Institution internal information channel (16) stating that: "As of today, we have ZERO positive [COVID-19] cases... according to Public Health Rules, we will still be considered an "outbreak" site until the end of May."

31. On May 28th, 2020, British Columbia's Chief Public Health Officer, Dr. Bonnie Henry, publically announced that "the outbreak at Mission Institution is over!" This announcement was televised on CPAC on May 28, 2020, where I saw it.

32. Notwithstanding the announcement by Dr. Bonnie Henry, I remain locked in my cell more than 23 hours per day, with the exception of 3 or 4 outdoor exercise periods per week, 60 minutes each period, and calls to legal counsel "when they can be facilitated. I have no idea when this lockdown/isolation will end.

17.

Spiritual / Religious prejudice and suffering:

33. I have already described in this affidavit the role that my family plays in my spirituality and my religious practice as one of Jehovah's Witnesses. Prior to being segregated/isolated, my wife [REDACTED] and I participated in weekly "family worship" of our creator. This involved Bible-based discussion and prayer, and we did this even after contact visits were suspended nationally by the Commissioner of Corrections on March 10, 2020. However, since being placed in segregation on April 2nd, 2020, [REDACTED] and I have been unable to share in "family worship" together — for the longest period of time in our 21 years of marriage. It is like a state-sponsored ban on our freedom to practice our religion, which was something that the Canadian federal government already did to Jehovah's Witnesses from 1940 - 1943. Not having our weekly opportunity to rejuvenate our spirituality together as a married couple has been very hard on me, and on the balance that our marriage requires to survive the harshness of long-term incarceration.

34. How I try to compensate for that is by spending the entirety of my 45 minutes per day out of my cell on the phone with her. This means foregoing my daily shower and instead washing myself in the

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impossibly small sink in my cell. I have only had 2 or 3 showers since April 2, 2020. What this choice enables me to do is have the "daily text" with my wife, from the booklet "Examining the Scriptures Daily", and a prayer. Then I try to be a good husband and listen to her thoughts, anxieties and feelings for a few minutes before checking on legal counsel emails (more on that topic below) and before you know it, back into my cell for another 23 hours and 15 minutes. That's my family spirituality for the past 85 days.

35. As for my connection with my faith community of Jehovah's Witnesses, communication with the Elders, or even meaningful spiritual conversation with my dear Indigenous mother, it is virtually non-existent. This has on many occasions left me feeling depressed, bitter and anxious. Especially was this so in May, 2020, when the prisoners in block [REDACTED] of Mission Medium Security Institution who practice the Muslim faith were permitted out of their cells all at the same time, daily, to share a meal and prayer together as a group during their religious festival month of "Ramadan". In contrast, when my wife sent me religious material to read and keep my spirits up on June 1st, 2020, ("Watchtower" magazines published by Jehovah's Witnesses), Mission Medium Security Institution

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Correctional Manager [REDACTED] seized the religious material and sent it back to my wife as "unauthorized". To me, it feels like this is yet another chapter in the ongoing saga of religious discrimination against me as an Indigenous Christian and Jehovah's Witness — something CSC has already admitted guilt to in the recent past (see attached Correctional Plan Update, [REDACTED], [REDACTED]).

[REDACTED]. That Mission Medium Security Managers would subject me to such discrimination on the 60th day of being segregated/isolated feels especially cruel to me. Particularly does this behavior anger me when I consider that my wife, who is unemployed due to COVID-19 community restrictions in place across B.C., spent \$13.00 to send this spiritual nourishment to me, only to have it returned to her. That's a lot of money for us right now, and I am feeling VERY non-spiritual towards the discriminatory Correctional Manager who has discriminated against us in this way.

Anger, depression, loneliness, self-absorption and fear (of what I want to do) are all emotions that my spirituality usually helps me keep under control. (see attached, Correctional Plan Update, [REDACTED], [REDACTED]).

Mission Medium Security Institution has taken that away from me by segregating/isolating me. That's a very bad idea, as I will explain below.

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Psychological prejudice/suffering

36. Although I have been incarcerated for almost 26 years without any form of release, I have not been placed in segregation / isolation for either administrative or disciplinary reasons - or any reason - until April [redacted], 2020. I am now 53 years old, and a grandfather. I am terrified that this experience will destroy me psychologically.
37. I have read the expert testimony of Dr. Stuart Grassian and Dr. Craig Henry in the British Columbia Supreme Court case *British Columbia Civil Liberties Association v. Canada (Attorney General)* (2018) BCSC 62. Their testimony, accepted in its totality by the court, identifies the real psychological risks inherent with all segregation / isolation exceeding 15 days. Particularly dangerous, as the testimony of Dr. Grassian states, is when segregation / isolation is "the result of an arbitrary exercise of power"; and "indeterminate" in length. That is exactly the segregation / isolation experience I am currently enduring.
38. Though I did nothing wrong to be segregated, I am. I have no way out - no end in sight. I don't know when - if ever - I will kiss my

wife, my mom, my granddaughter again. I walk around in my cell talking to myself all day long, ruminating on what I want to say to [REDACTED] for stealing my legal mail when I'm trying to fight for my life in court. I can't stop thinking about what my family went through when I didn't call them and every day on the news the number of COVID-19 infections just kept ballooning until it was reported that an inmate had died at Abbotsford Regional Hospital. No one phoned my family to tell them where I was for four days, and then no CSC employee called them to reassure them that it was not me who had died. My Mom told me that my wife phoned her and was screaming and sobbing uncontrollably one night when she didn't know where I was. She said that she "felt me die". My mom wrote me three weeks ago and said in her letter that she really thought she had lost me. My sister was phoning every news station that would take her call and screaming my name at them. THAT just goes around and around in my head. I want CSC to pay, but I don't want to carry this anger, because I want to be a happy guy. I pray day and night to help me not hate.

39. Meanwhile, in the cells on my tier, men scream out sporadically, in obvious anguish. Day and night they do this. The inmate representative for block [REDACTED] told me yesterday that

22.

one of the men on our tier, a guy they call [REDACTED] had slashed his own face with a razor blade in protest. Another kid down the hall named [REDACTED] walks around in his cell at 2:30 am screaming gibberish to no one in particular. My next door neighbour, [REDACTED] has smashed almost everything in his cell - all his own property. [REDACTED], in the cell right across from mine, blocks his window almost every day, forcing a "crisis response" with the staff who have to see a live body in his cell before the count can be validated. Slowly I feel myself calcifying on the inside - losing all sense of time, space, and the empathy I have worked so hard to acquire for 25 years. That's the only way I can get through each day; be numb to my own humanity. It seems ironic. Being numb to my own humanity earned me a life sentence 26 years ago. Now CSC has purposefully engineered a "program" to take me all the way back to that place. Every day on the news I hear the haves and the have-nots fighting over ending lockdowns to save "the economy". CSC has seemingly resolved that dichotomy. The incarcerated at Mission Medium Security Institution ARE their economy. And keeping me locked in my cell like a lunatic in training is evidently making economic sense to someone - otherwise you had better believe that they wouldn't be doing it. Thats the truth that goes round and round in my head every day.

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40. And as I continue to stew in my own juices of anger, conspiracy, and claustrophobia, I tell myself that I can take this. "c'mon man, suck it up - you're an Indian." Some days that works. Others, not so much. My aunt died last week. My mom's sister. My favorite aunt. I don't know where to put that. I cry and then I stop. I have been crying a lot since I came back from the hospital. But its tears without emotion. I try to write a letter and after one or two pages, I just crumple it up and flush it. I know I will survive this. I don't think it's possible for me to die. Really! I think that I'm already dead. I died in the hospital. [REDACTED] felt it. She's never wrong. I believe that.

Legal prejudice

41. I am currently self-represented and fighting for my life in the [REDACTED]. [REDACTED] [REDACTED] I have also applied for judicial release under sections 20 and 57(4) of the Extradition Act. And finally, I have applied for an order from the Court that I not be surrendered for extradition until all judicial review of the Justice Ministers decision(s) are completed. Lots of paperwork, between the applications, the motions and the affidavits. Trying doing it

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locked in your bathroom (my cell) without a computer. They let me use a computer back on April 30, 2020. But when I used it to write an affidavit for my judicial release hearing, telling the court how I had contracted COVID-19 and the prejudice that caused me, suddenly using computers was no longer "safe". (see attached, CSC request forms

[REDACTED] to [REDACTED]) Then

theres the mail.

42. Like most self-represented litigants, I have help. Mine is an incredible wife who fields all of my email communications with the DOJ, the BCCA Registry, and legal contacts, like the International Assistance Group in ottawa. She also prints the notices from the chief Justice of the B.C. Court of Appeal regarding time-lines and instructions related to court schedules during the COVID-19 crisis, as well as case law and materials (research) I need for case preparation. She mails it to me here at the prison and a Correctional Manager who is in charge of the correspondance here named [REDACTED] siezes the mail and returns it to my wife. I've appealed to the Warden, my parole officer and anyone I can think of, but it feels like the same things happening outside the fence are also happening in here. No one in the "police" believes they're unjust.

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Filing a judicial review in Federal Court typically requires exhausting the internal grievance process first and that's a two-year process for low. Even then, mandamus isn't available on an interlocutory motion in Federal Court and I believe that section 22 of the Crown Liability and Proceedings Act acts as an absolute barrier to the court issuing an injunction. So, I'm screwed. (see attached, CSC request forms, [REDACTED], et al., [REDACTED] to [REDACTED], numbered [REDACTED]) Plus I'm locked down. No use begging the B.C. Court of Appeal. They have no jurisdiction on this one. Something tells me that [REDACTED] knows this.

43. And if all of this isn't enough, I applied for parole in early March, before the world exploded. My parole officer hasn't been here since then. The Elder hasn't been here since then. Elder assisted hearings are cancelled for the Parole Board of Canada. The only thing that works evidently are psychologists - who now do risk assessments during 80-day pandemic lock downs. Nothing too crazy about that. (see attached, [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED])

44. As I look back just at this section of the affidavit alone, it seems like no one could possibly survive this. Then I look back at the

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section on psychological prejudice / suffering and I realize that I actually haven't survived this. [REDACTED] got it right. I died in the hospital. The BCCA Justice will likely find value in that at my bail hearing next week. My death likely lowers the risk to public safety. Which I have to believe is the reason CSC, and specifically mission Medium Security Institution decision-makers have no intention of ever opening my cell-door again.

June 25, 2020

Affirmed before me at the city of Mission, in the province of British Columbia, in the country of Canada, on

June 25, 2020

(date)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(signature of deponent)

Commissioner for taking affidavits:

[REDACTED]
[REDACTED]
(signature)

Stamp: [REDACTED]
[REDACTED]
[REDACTED]

Commissioner for taking
Affidavits for British Columbia