

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS

Plaintiff

and

**THE ATTORNEY GENERAL OF CANADA and HER MAJESTY THE QUEEN IN
RIGHT OF ONTARIO**

Defendants

-and-

**THE HAUDENOSAUNEE THE HAUDENOSAUNEE DEVELOPMENT INSTITUTE
(AARON DETLOR AND BRIAN DOOLITTLE), AS APPOINTED BY THE
HAUDENOSAUNEE CONFEDERACY CHIEFS COUNCIL, ON BEHALF OF THE
HAUDENOSAUNEE CONFEDERACY**

Moving Party

**AMENDED RESPONDING MOTION RECORD OF THE MEN'S FIRE OF THE
SIX NATIONS GRAND RIVERY TERRITORY**

January 9, 2023

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Moving Party

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TAB 1

Court File No. CV-18-594281-0000

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS

Plaintiff

and

**THE ATTORNEY GENERAL OF CANADA and HER MAJESTY THE QUEEN IN
RIGHT OF ONTARIO**

Defendants

- and -

**THE HAUDENOSAUNEE DEVELOPMENT INSTITUTE (AARON DETLOR AND
BRIAN DOOLITTLE), AS APPOINTED BY THE HAUDENOSAUNEE
CONFEDERACY CHIEFS COUNCIL, ON BEHALF OF THE HAUDENOSAUNEE
CONFEDERACY**

Moving Party

AMENDED NOTICE OF MOTION

The Men's Fire of the Six Nations Grand River Territory will make a motion to a Judge of the Superior Court of Justice on date and time to be determined by the Case Management Judge, Justice Sanfilippo, or soon after that time as the motion can be heard, at the Courthouse, 330 University Avenue, Toronto, Ontario.

PROPOSED METHOD OF HEARING: The motion is to be heard orally

THIS MOTION IS FOR:

1. An Order:
 - a. granting leave to the Men's Fire of the Six Nations Grand River Territory to intervene as an added party in this proceeding on HDI's pending motion, pursuant to rule 13.01 of the *Rules of Civil Procedure*; and
 - b. granting leave to the Men's Fire of the Six Nations Grand River Territory to intervene as a friend of the court in this proceeding, only if HDI is granted leave to be added as a party, pursuant to rule 13.02 of the *Rules of Civil Procedure*; or
 - c. granting an invitation of the presiding judge to the Men's Fire of the Six Nations Grand River Territory to intervene as a friend of the court in this proceeding, only if HDI is granted leave to be added as a party, pursuant to rule 13.02 of the *Rules of Civil Procedure*.

THE GROUNDS FOR THE MOTION ARE:**A. Overview**

2. The Men's Fire of the Six Nations Grand River Territory ("The Men's Fire") objects to the request of HDI and HDI's position that they are lawfully authorized to represent the plaintiffs in this proceeding. These non-parties as well do accept HDI's position that the land claim issue of the plaintiffs must be determined by a proper representative of the Haudenosaunee, as established by Haudenosaunee law. However, HDI is not a properly authorized representative of the Haudenosaunee people.
3. The Men's Fire objects to the HDI's claim that they have been selected, according to traditional Haudenosaunee law, as the official representative of the Haudenosaunee People to advance the interests of the Haudenosaunee Confederacy and its citizens in litigation. The basis for this objection is twofold, stemming from questions arising from an ongoing legal dispute

regarding the legitimacy of HDI as an organization and delegate of the Haudenosaunee people and from the misrepresentation of traditional Haudenosaunee law by HDI.

4. The parties believe that land claim issues should be determined under Haudenosaunee law. These parties have consulted with one of North America's leading experts on Haudenosaunee law, Paul Delaronde. Paul Delaronde has testified on Haudenosaunee land claim issues in courts in the following jurisdictions: Ontario, Quebec, The United States of America. He has also been deemed an expert by an Ontario court. It is fundamental to these parties that the rights of the people are not trampled upon by determinations outside of Haudenosaunee law.

5. The Men's Fire seeks representation status in order that they may act in the best interest of the plaintiffs as a lawful representative under the Gayanashagowa.

B. Basis for Intervention in Haudenosaunee Law

5. The Men's Fire seeks to intervene in this matter in order to correct the misrepresentation of Haudenosaunee law by the HDI and the exploitation of that misrepresentation by the HDI in their attempts to intervene as representatives of the Haudenosaunee people and their interests with respect to this proceeding.

6. The basis for the intervention of The Men's Fire is derived from Haudenosaunee Law itself, specifically the Constitution of the Haudenosaunee Confederacy, more commonly referred to as the Great Law of Peace or Gayanashagowa.

7. Paragraph 98 of the Gayanashagowa, under the section "Rights of the People of the Five Nations," states that:

"If either a nephew or a niece see an irregularity in the performance of the functions of the Great Peace and its laws, in the Confederate Council

or in the conferring of Lordship titles in an improper way, through their War Chief they may demand that such actions become subject to correction and that the matter conform to the ways prescribed by the laws of the Great Peace.”

By way of this right to intervene where the performance of the laws laid out in the Haudenosaunee Constitution is an “irregularity” and improperly carried out, The Men’s Fire seeks to object to the actions taken by the HDI and assert that future actions in this proceeding be performed according to the proper functions of the Great Peace and its laws.

8. The authority of the Men’s Fire to make this intervention is established by the Haudenosaunee Constitution, the Gayanashagowa, under the rights of the people of the five nations. Paragraph 94 of the Gayanashagowa establishes that each clan of the five nations shall have a council fire responsible for discussing the welfare of the clans. Paragraph 95 of the Gayanashagowa establishes that when it is deemed necessary for the interest of the people the men or women of a clan’s council fire may hold a council to promote their decisions and recommendations to the Council of Lords for consideration. The decisions and recommendations of the Men’s Fire are reported to the Confederate Council by the War Chief. The War Chief, empowered by the Men’s Fire, can demand, as established in paragraph 98, that the actions of the Confederate Council be subject to correction in order to conform to the ways prescribed by the laws of the Great Peace.

9. The Men’s Fire have identified the irregular and improper performance of the Great Peace and its laws in the actions of HDI where HDI has sought to, through

irregular means, improperly establish itself as the legitimate delegate representing the Haudenosaunee Confederacy and its people in these proceedings.

C. Unresolved Legal Issues Involving the Haudenosaunee Development Institute

10. The plaintiffs in an ongoing dispute (CV-16-58391) proceeding under the *Class Proceedings Act*, 1992, S.O 1992, c.6, claim that HDI is operating in breach of trust and fiduciary duty.

11. Moreover, the plaintiffs claim that HDI has acted negligently and/or fraudulently in representing themselves as caretakers for the Haudenosaunee people. HDI is also alleged to have misrepresented themselves as an organization that would report back to the HCCC and Haudenosaunee people, failing to provide them a full account of both its funds and the status of its work involving ongoing projects and land claims.

12. The plaintiffs demonstrate the fraudulent nature of the HDI claim to legitimately represent the HCCC and the Haudenosaunee people by providing evidence that the Declaration of Trust signed to establish HDI names a number of Chiefs who were deceased at the time of signing or were no longer serving as Chiefs of the HCCC.

13. The plaintiffs also demonstrate that the vast majority of Chiefs named by the HDI as authorities which bestowed upon them the status of delegate have not seen or read the Declaration of Trust, nor have they received any monies supposedly held by HDI and purportedly obtained for their benefit. The plaintiffs allege that HDI has been using such funds for their personal benefit and contrary to their stated duties and obligations.

14. The members of HDI are also alleged to have failed to consult and obtain approval from the Haudenosaunee People with respect to the Land Lease Agreements to ensure that local

stakeholders were aware of and supportive of their projects with respect to the Land Lease Agreements.

D. Misrepresentation of Traditional Haudenosaunee Law by HDI

15. The HDI claims to have been established pursuant to the authorization of the HCCC and also made to be a delegate of the Haudenosaunee Confederacy in respect to their lands and represent their interests in these proceedings and elsewhere. Both of these claims are backed by sparse supporting evidence which suggests that certain members of the HCCC, but not all of its members and representatives, were consulted to confer legitimacy upon HDI as a representative of the people.

16. HDI claims, as evidenced in the affidavit of Brian Doolittle, that the HCCC met on April 2, 2022 to resolve to authorize the HDI to intervene in this litigation and represent the interests of the Haudenosaunee Confederacy and its people. Doolittle states in his affidavit that this meeting was carried out properly according to Haudenosaunee law. However, Doolittle fails both to provide substantial evidence that this meeting took place or that it was properly carried out according to the conditions laid out in Haudenosaunee law.

17. In his affidavit, Brian Doolittle claims that the meeting was legitimate as a result of its having been attended by representatives from all three branches of the HCCC. However, Haudenosaunee law states that in matters of great concern to all five nations, the Haudenosaunee people as a whole must be consulted and represented in the decision-making process. This process, if carried out properly and in accordance with Haudenosaunee law, requires that representatives, both male and female, from all of the different groups which fall under the name of the Haudenosaunee Confederacy attend such a meeting. Haudenosaunee law establishes that it

is only through the unanimity of the 49 clans that the HCCC can operate, this is illustrated in Schedule “A” wherein a meeting of 49 representatives is pictured. This is supported textually by the Gayanashagowa and by the expert testimony provided by Paul Delaronde in his affidavit, to be filed.

18. The actions taken by HDI in establishing themselves as delegates of the Haudenosaunee were irregular and improper insofar as approval from the HCCC was granted by a limited number of Chiefs, and not Chiefs and/or representatives of all 49 clans of the Haudenosaunee Confederacy. The Chiefs of the HCCC who provided authorization to HDI are themselves only empowered insofar as they act and function as representatives and delegates of their individual clans. In order for HDI to have properly sought authorization, they would have required unanimous assent from delegates and/or representatives of all 49 clans. The expert testimony provided in the affidavit of Paul Delaronde, to be filed, as well as the Schedule “A” illustration of Haudenosaunee government structure, confirms that the actions taken by HDI do not conform to the proper and regular established processes required by Haudenosaunee law.

19. There is no evidence that there was any proper consultation or unanimity achieved in the process of appointing HDI to represent the Haudenosaunee people in this matter or otherwise. Moreover, The Men’s Fire provides contrary evidence which demonstrates the unlawful nature of the actions taken by HDI.

E. The Proper Course of Action as Outlined by Haudenosaunee Law

20. According to the Gayanashagowa and the information provided by the affidavit of Paul Delaronde, to be filed, the Haudenosaunee law provides that the Haudenosaunee people must be consulted on matters such as the delegation of authority involving land claims.

19. The information provided by Delaronde suggests that, as opposed to the course of action taken by HDI which was to consult with a limited group of individual representatives of the HCCC, the proper course of action would be to put a delegation together to present to the people in all of the Haudenosaunee territories. This delegation would travel, making arrangements with each group, meeting with the men and especially the women as they are the holders of the land and nothing can be done without their consultation.

21. Thus the HCCC only has the authority to make a decision and delegate the powers that HDI sought when the people as a whole have expressed they understand the issue at hand and affirm the council's decision.

22. Following the people's approval, the HCCC ought to have moved forward to contact the Governor General as a representative of the crown to remind them of their pledge to honour the Silver Covenant Chain, the basis of the nation-to-nation relationship between the British Crown and the nations of the Haudenosaunee Confederacy.

23. The actions of HDI in consulting only a small circle of Chiefs and HCCC representatives does not qualify as involving the Haudenosaunee people as a whole and acquiring their collective approval. This circle, including the secretary of the HCCC and the members claimed by Doolittle to have attended the April 2, 2022 Zoom conference, lacks the authority to delegate representation to the HDI as they do not and cannot represent the whole of the Haudenosaunee Confederacy and its people.

THE FOLLOWING EVIDENCE will be used at the hearing of the motion:

24. The affidavit of Paul Delaronde, to be filed.
25. Such further and other material as counsel may advise and as this Honorable Court deems just.

DATED this ~~7th~~ day of ~~November, 2022~~
6th day of February, 2023

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SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS
Plaintiff

-and-

THE ATTORNEY GENERAL OF CANADA *et al.*
Defendants

Court File No. CV-18-594281

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
TORONTO

AMENDED NOTICE OF MOTION

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Nations Grand River Territory

TAB 2

Court File No. CV-18-594281

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

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Moving Party

AFFIDAVIT OF WILFRED DAVEY

I, WILFRED DAVEY, of the community of Six Nations, Grand River Territory in Haldimand County, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am the secretary for the Hodiskeaghda, the Men's Fire of the Grand River Territory ("Men's Fire), the party moving to intervene in this action. As such I have personal knowledge of the facts which I hereinafter depose. Where that knowledge is based on information and belief obtained from others, I have stated the source of the information. I believe everything set out in my affidavit to be true and accurate.

2. I am a an Aboriginal of Haudenosaunee descent and a member of the Haudenosaunee community, commonly referred to as the Six Nations.

A. Background

3. In this affidavit I address issues related to the creation of the Haudenosaunee Development Institute (“HDI”). The legitimacy of HDI as an organization and as a delegated representative of the Haudenosaunee remains in question. I also discuss the issue of the trust in respect to the founding of HDI which remains involved in an ongoing legal dispute.

4. The ongoing class action legal dispute between Davey et al. and Hazel Hill et al., in the Superior Court of Ontario bearing action number 16-58391 concerns HDI operating in breach of trust and fiduciary duty.

5. HDI is also alleged to have and continues to act negligently in representing themselves as caretakers for the Haudenosaunee people. HDI has misrepresented themselves as an organization that would report back to the Haudenosaunee people both its funds and the status of its work involving ongoing projects and land claims.

B. Foundation of HDI in Breach of Trust

6. In the declaration of trust, through which HDI was established, a number of the Chiefs listed on the document are vacant titles. Names that appear on the document under the Cayuga Clan, the chief titles: Soyo:wis, Hagya;drohne, and Hadoda:he:ha titles have been vacant since 2004, years before the signing of the declaration of trust. Attached hereto and marked as **Exhibit “A”** is a copy of the Grand Council in 2004. Attached hereto and marked as **Exhibit “B”** is a copy of the declaration of trust.

7. Furthermore, the chief title of Deyohowe:to found on the declaration trust was formerly occupied by Manfred Miller who has been deceased for about a decade.
8. On or about the 31st day of March 2017, I spoke with Sam General, a Chief of the Cayuga Clan, and showed him the declaration of trust signed by Hazel Hill and the fact that his name appears at line 10 of the declaration of trust.
9. I am advised by Sam General and do verily believe to be true that he was not aware that Hazel Hill was a registered owner of shares in 2436543 Ontario Inc. (HDI), and this was done without his knowledge and consent.
10. Further, on the 29th day of March 2017, I spoke with Steve Maracle, a chief of the Cayuga Clan and informed him that a declaration of trust was signed by Hazel Hill and his name appears on the declaration of trust.
11. I was advised by Steve Maracle and verily believe to be true that he was not aware that Hazel Hill was a registered owner of share in HDI and this was done without his knowledge and consent.
12. I am of the belief that there is an overwhelming amount of evidence to support the fact that a number of Chiefs who are purported beneficial owners of the shares of HDI are deceased and not aware of their purported “beneficial ownership”. The circle wampum is a very important belt for the Haudenosaunee, Teiakotiokwenhaasta, and binds the people. Each of the 50 clan families in the wampum appoints a Chief. At the time of the declaration of trust, there were 29 deceased Chiefs and 23 vacancies, including 10 from the Mohawk Nation, 3 from the Oneida

Nation, 4 from the Seneca Nation, 4 from the Cayuga Nation, 6 from the Onondaga Nation, and 2 from the Tuscarora Nation.

13. Accordingly, the 50 Chiefs of the Grand Council required by the processes laid out in the Great Law to give powers to a delegate and to authorize HDI never signed the declaration of trust.

C. HDI in Breach of Fiduciary Duty

14. I am informed and do verily believe that funds have been wrongly misappropriated and/or converted by HDI and will continue to be used, thereby precluding the recovery of the funds properly belonging to the HCCC and the Haudenosaunee people.

15. The monies held by HDI and purportedly obtained for the benefit of the aforementioned Chiefs are alleged to have been misused. Funds meant to be used for the benefit of the Haudenosaunee community and people have been misappropriated and self-interestedly used for personal benefit and for the commercial interests of HDI contrary to HDI's stated duties and obligations.

16. HDI has also failed to consult and obtain approval from the Haudenosaunee people with respect to land lease agreements and to ensure that local stakeholders are aware of and supportive of their projects.

17. Despite the duties and obligations of HDI, the Haudenosaunee community has no knowledge of what funds have been paid and to whom payments have been made from the various projects that HDI has taken on. Little to no information involving these projects has been made available by HDI, including the names of the projects or any details of the funds being

derived from such projects. HDI's dealings with the Haudenosaunee community with respect to their management of land lease agreements and other projects have been characterized by a distinct lack of transparency. Attached hereto and marked as **Exhibit "C"** is a table containing the limited available information regarding the management of project funds.

18. I verily believe that HDI is seeking to be a representative and intervene in this proceeding in order to divert funds for their own personal benefit and deprive the Haudenosaunee people of the benefits to which they are entitled. In particular, HDI has provided no accountability to the people of the following projects they were involved in allegedly on the people's behalf: Burch Restoration Project 350 acres, Solar Farm SRE GRS Holdings (Samsung) 800 acres of solar panels, Grand Renewable Energy (GRSLP), Enbridge Line 9 extension, Windmill Project Nanticoke to Sarnia, Nextra Energy Canada, Red Hill Valley extension Hamilton, Seneca Township Empire Homes, DCE Caledonia 350 acres of home development, Empire Homes in Hagersville 250 acres, and numerous quarries in southern Ontario. There very well could be other projects but due to HDI's lack of transparency the people remain in the dark about all HDI projects where they hold funds on behalf of the people.

D. Improper Authorization of HDI by HCCC

19. HDI claims to have been created pursuant to the authorization of the HCCC and also made to be a delegate of the Haudenosaunee Confederacy with respect to their lands and represent their interests in legal proceedings related to these lands.

20. I am informed by Janace Henry, of the Community of Hagersville in Haldimand County, a Condoleed Cayuga Ball Deer Clan Mother of the Haudenosaunee people at Six Nations reserve, and do verily believe that the letters and other evidence produced by HDI which purport that the

Clan Mothers and HCCC had given their support for the authorization of HDI is not true and that the Clan mothers and Chiefs were never in unanimous agreement on the matter. Attached hereto and marked **Exhibit “D”** is the affidavit of Janace Henry.

21. I am informed by Janace Henry and do verily believe that Aaron Detlor sought to hijack the meetings of HCCC and announce without the support of the Clan Mothers, who certainly did not unanimously agree to anything, that documents were passed by the council in support of the authorization of HDI as a legitimate actor on behalf of and representative of the Haudenosaunee Confederacy.

22. I am informed by Janace Henry and verily believe to be true that Shirley, another Clan Mother, travelled to the HDI offices to request to see the documents mentioned above. However, Shirley was denied access and ultimately did not receive the requested documents. HDI failed to live up to basic standards of accountability and transparency to the people it claimed to represent when forcing its own authorization through the HCCC without proper unanimous support of the Clan Mothers who are responsible for matters pertaining to the land.

23. HDI claims, as evidenced in the affidavit of Brian Doolittle, that the HCCC met on April 2, 2022, to resolve to authorize the HDI to intervene in this litigation and represent the interests of the Haudenosaunee Confederacy and its people. Doolittle states in his affidavit that this meeting was carried out properly according to Haudenosaunee law. However, there is no substantial evidence that this meeting took place and was carried out according to the traditional Haudenosaunee laws of governance. This meeting was improperly carried out and does not comply with the requirements laid out in the Great Law for decisions that involve matters

affecting the entirety of the confederacy and its people. There is no evidence of the requisite decision making from the Chiefs or the Clan Mothers at all.

24. I reviewed the decision-making process in section “E” of the affidavit of Paul Delaronde and I can confirm the following as the secretary for the Hodiskeaghda, the Men’s Fire.

25. I am informed and do verily believe that there never was a proper meeting of the 50 Chiefs of the Grand Council to authorize HDI. Moreover, the people as a whole and the women and Clan Mothers of the Haudenosaunee were not consulted as is required by the processes laid out in the Great Law.

E. Lack of Broad Support for HDI Among Six Nations

26. Regarding the Oneida, I have spoken to Daryl Chrisjohn in or about October, 2022 and I was informed and do verily believe that there is no record of a letter published in support of HDI or any alleged support of HDI was brought to the council. Attached as **Exhibit “E”** is a copy of a letter of concern received from Oneida regarding HDI.

27. Regarding the Mohawk Nation Council of Chiefs (“MNCC”), on about November 14 I spoke with one of the chiefs of the Mohawk Nation Council of Chiefs, and he has again never heard or seen or been made aware of any such letter sent on behalf of the MNCC. And would never have approved of any letter supporting HDI.

28. I also on the same day contacted the MNCC office, and spoke with x who informed me and I do verily believe that no such letter or the issues raised in the letter were on any agenda for the meeting or discussed at any meeting, which is a requirement of the MNCC in effect of any

EXHIBIT A

This is Exhibit "A" to the Affidavit of
Wilfred Davey, sworn this 6th day of
January, 2023



Commissioner for Taking Affidavits

Grano Council 2004

Mc hawks

So:sgoharowanəh
Ha sdawəserəta
Del tənə'gari:ne'
Awəhəgo:wah
Dycəhəghoh
Sa'əhə:na
Tse degarihwade'
Hayəhwahta'

De:ariho:ge

vacant bear
vacant bear
vacant bear
vacant wolf
vacant wolf
vacant wolf
vacant turtle
Joe Sky turtle
Vernon Vyse turtle
Samson Gabriel turtle
Allen McNaughton turtle

Oneida

Hodatsehdeh
Ganohgwə'yo:doh
Deyoha'gwə:de
Sonohse:s
Hadwənae'gə'ah
Hadya'donəta'
Dehadəhohde:yo
Hanya'dasa:ye'
Howatsadəhoh
Foster Elijah wolf
vacant wolf
vacant wolf
vacant turtle
Dalton Doxtator turtle
vacant turtle
Bob Brown bear
vacant bear
Belanger Brown bear

Seneeca

Dyor:inoh'ga'wə'
Ganohgi'da:wi:
Sadyənawat
Nish'yenəhna
Ga'nogae:'

Sege'jo:wa:
Tsa'degaohyes
Sgai'yadae:yo:

Norman Hill wolf
Roger Hill snipe
Darren Jimerson bear
vacant snipe
Emerson Webster turtle
Stanley Buck turtle
Stuart Jamieson hawk
vacant snipe
Kervin Jonathan turtle

Cayuga

Haga'əyok
Gaji'nodawehe
Gada:gwa:sə:
Soyə:wi:s
Hagya'drohne'
Dyohy:goh
Deyotowəhəhoh
Deyohowe:to:
Hadoda:he:ha'
Desgahie
Frank Buck ~~deer~~ ^{deer}
Steve Maracle deer
Andrew Warner bear
vacant bear
vacant turtle
Sam General wolf
Cleve General wolf
Manfred Miller snipe
vacant snipe
Steve Jacobs bear

Onondaga

Tadoqahoh
Gane'se:he:
Dehatgahdos

Honya'daji:wak
Awe'gehvat

Dehayatgwae
Honowiyehdi
Gawəne:sə:doh
Hah:loh
Hoyə:nyənih
Sodegwa:sə:
Sagəgəhe:
Sə:ha:wi:
Sganawadih

Sid Hill eel
Kervin Williams wolf
Arnie General beaver
Irv Powless wolf
Perry Williams wolf
Virgil Thomas wolf
Toby Williams wolf
vacant turtle
Aly Gibson wolf
Pete Sky deer
Bob Claus deer - Ron Thomas (beavermen)
vacant eel
vacant eel
Vince Johnson eel
vacant deer
Oliver Jacobs turtle - Arnold Jacobs (beavermen)


Tuscarora

Leo Henry
Stuart Patterson

*Cayuga Male
Earth Keeper*

EXHIBIT B

This is Exhibit "B" to the Affidavit of
Wilfred Davey, sworn this 6th day of
January, 2023



Commissioner for Taking Affidavits

DECLARATION OF TRUST

IN CONSIDERATION of the sum of \$1.00 now paid to the undersigned and for other good and valuable consideration (the receipt and sufficiency of which is acknowledged), the undersigned declares that 50 common shares (the "Shares") in the capital of 2438543 Ontario Inc. (the "Corporation") registered in the name of the undersigned, in trust, on the books of the Corporation, and all monies, shares or other property which may be payable in respect of the Shares, whether by way of dividends or capital distributions or otherwise howsoever, and all of the benefits pertaining to the Shares are held by the undersigned in trust for the Whiskniyonwenstake Rotionisonh (Haudenosaunee Confederacy Chiefs Council at Grand River), as set out in Schedule "A" attached (the "Beneficiary") and that the undersigned will convey, transfer, deal with or otherwise dispose of the Shares and any income or capital paid in respect of them, and any other benefits pertaining to them in such manner as the Beneficiary shall from time to time direct. The provisions of this Declaration are binding on the undersigned, and the successors and assigns of the undersigned, and enure to the benefit of the Beneficiary and the heirs, legal personal representatives, successors and assigns of the Beneficiary.

DATED as of the 20th day of October, 2014.

HAUDENOSAUNEE DEVELOPMENT
INSTITUTE, in trust

Per:



Name: HAZEL E. HILL

Title: DIRECTOR

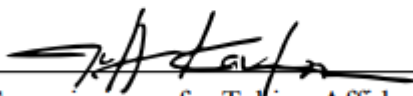
"Schedule A"

Cayuga		
	Clan	Chief Title
1.	Bear	Haga'e,yok
2.	Bear	Gada:gwa:se:
3.	Bear	Soyo:wi:s
4.	Bear	Desgahe
5.	Deer	Gaji'nodawehe
6.	Heron	Hadoda:he:ha'
7.	Snipe	Deyohowe:to:
8.	Turtle	Hagya;drohne
9.	Wolf	Deyotowehgoh
10.	Wolf	Dyohyo:goh
Oneida		
11.	Bear	Atahu?ta:y
12.	Bear	Lauyatashat
13.	Bear	Owatsa?t tha
14.	Turtle	Shonuhses
15.	Turtle	Thanahak tha
16.	Turtle	Atya?tan tha
17.	Wolf	Otatshehte
18.	Wolf	Kanukwe?nyo:tu
19.	Wolf	Teyohakw t
Mohawk		
20.	Bear	Dehharagereneh
21.	Bear	Rastawehserondah
22.	Bear	Sosskoharowaneh
23.	Turtle	Ayonwatha
24.	Turtle	Tehkari:hoken
25.	Turtle	Sadekari:wadeh
26.	Wolf	Sahrehowaneh
27.	Wolf	Orenrehgowah
28.	Wolf	Deyonhehgiveh
Seneca		
29.	Bear	Sadyenawat
30.	Hawk	Sag,'jo:wa:
31.	Snipe	Ganohgi'da:wi:
32.	Snipe	Nishayene<nha
33.	Snipe	Tsa'degaohyes
34.	Turtle	Ga'nogae:
35.	Turtle	Sganyadeae:yo:
36.	Wolf	Dyonin'ho'ga'we'
Onondaga		
37.	Beaver	Dehatgahdos
38.	Deer	Se,;ha:wi:
39.	Deer	Hahi:hoh

40.	Deer	Gawe,ne,se,:doh
41.	Eel	Sagoge,he:
42.	Eel	Sodegwa:se,:
43.	Eel	Hoyo:ny,nih
44.	Eel	Tadodahoh
45.	Turtle	Sganawadih
46.	Turtle	Dehayatgwae
47.	Wolf	Honowiyehdi
48.	Wolf	Awe'ge,hyat
49.	Wolf	Honya'daji:wak
50.	Wolf	Gane'se:he:

EXHIBIT C

This is Exhibit "C" to the Affidavit of
Wilfred Davey, sworn this 6th day of
January, 2023

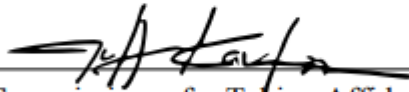


Commissioner for Taking Affidavits

Company	Annual Lease	Annual Land Acquisition	Total Over 20 Years	Amounts Rec'd to Date
Project 2	\$250,000	\$125,000	\$7,500,000	\$300,000 \$250,000
Project 4	\$230,000	\$115,000	\$6,900,000	
Project 5	\$160,000		\$3,200,000	\$320,000
Project 6	\$30,000		\$600,000	
Project 6 Partnership			\$14,733,254	
Project 7a	\$150,000	\$75,000	\$4,500,000	\$75,000 \$37,500
Project 7b	\$150,000	\$50,000	\$4,000,000	
Project 8	\$11,000		\$220,000	\$11,000
Project 9	0		\$125,000	
Project 10	\$6,000		\$120,000	
Project 11	\$13,750		\$275,000	
TOTALS	\$1,000,750	\$365,000	\$42,173,254	\$706,000 \$287,500

EXHIBIT D

This is Exhibit "D" to the Affidavit of
Wilfred Davey, sworn this 6th day of
January, 2023

A handwritten signature in black ink, appearing to read "J. A. Taylor", is written over a horizontal line.

Commissioner for Taking Affidavits

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

WILFRED DAVEY and BILL MOUNTURE

Plaintiffs

and

**HAZEL HILL, BRIAN DOOLITTLE, ARRON DETLER,
HAUDENOSAUNEE DEVELOPMENT INSTITUTE, 2438543 INC.,
OGWAWIHSTA INC., ELVERA GARLOW**

Defendants

AFFIDAVIT OF JANACE HENRY

I, JANACE HENRY, of the Community of Hagersville in Haldimand County, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. The Haudenosaunee Confederacy Chief Council (hereinafter referred to as the "HCCC") represents the legal interests of approximately 25,000 aboriginals made up of the Mohawks, Oneidas, Onondagas, Cayugas and Senecas. The sixth nation, the Tuscaroras joined the confederacy in the early eighteenth century.
2. The Tuscaroras, Mohawks, Oneidas, Onondagas, Cayugas and Senecas (are hereinafter referred to as the "Haudenosaunee People").
3. I am a Condoled Cayuga Ball Deer Clan mother of the Iroquois Confederacy Haudenosaunee People at Six Nations Reserve, and as such I have knowledge of the

matters hereinafter deposed to. Where my knowledge is based on information provided by third-party, I have identified that party and I believe the information to be true.

4. I am 59 years old and lived within the Six Nations Reserve my entire life. I have raised seven (7) children within the Reserve, with my husband of 42 years.
5. As a Clan Mother, we live by "The Great Law", which is Peace, Power and Righteousness. A Clan Mother's job is to listen to all other Clan members, so that any issues that may arise in the community, or issues that come in to council may be addressed and brought to the attention of the Chiefs.
6. The Chief's job is to listen to the Clan Mother, who in turn listens to the People of the Clans, and discuss the issues at council meetings with the other Chiefs. The Chiefs will debate issues and return to Clan members or other Clan families to obtain further information, if necessary to obtain a consensus amongst the HCCC.
7. In order for anything to be passed by council, all Clan Mothers and Chiefs must be in 100% agreeance. Attached hereto and marked as **Exhibit "A"** to this my affidavit is a copy of a list of the Clan Mothers and Chiefs.

ONEIDA NEGOTIATIONS

8. When the Douglas Creek Estate had the uprising in or around 2006, there were occurrences in which I disagreed with at the site. When the people gathered at the site, there were Chiefs and Clan mothers present, and it was my belief that the Clan mothers should not have been present due to the dangers of the site. I believed it was a job for the young men of the Clan. This occurrence is what initiated the negotiations with respect to the Douglas Creek Estate.

9. The negotiations came to the Oneida complex in or around two months of the commencement of the Douglas Creek Estate uprising, and I believe that they carried on for approximately two (2) years.
10. I am a caterer by trade, and Negotiations, which were meetings held to discuss the land claim of the Douglas Creek Estate, hired me to cater the meals for all negotiations. I was aware of all the meetings that took place as I catered the meals, and I observed Mr. Aaron Detlor, a named Defendant in this proceeding, (hereinafter referred to as “**Detlor**”) was present at the meetings, however, I never knew what was discussed at the meetings as I did not attend the meeting room due to my role as a caterer.
11. The negotiations meetings were Chief’s business, and the Chiefs were to inform the Clan mothers of the issues that were discussed at each meeting. I observed my Chief, Steve Maracle sit in on a few meetings, but he never informed me of what was discussed during the meetings. Further, Detlor never informed me of what had taken place during the meetings, despite being present at all the meetings.
12. I believe that significant changes were discussed within these negotiation meetings between the Chiefs and Clan mothers who were present, however, I am not certain of the extent of the changes due to the fact that no one informed me of what was discussed during the meetings.

ONONDAGA LONGHOUSE

13. I returned to carry on the duties of my title within the Onondaga Longhouse, also known as the HCCC in January 2016, after taking a number of years off due to not being properly informed of what was taking place within the community. The first council meeting held after my return was January 2, 2016, which I attended.

14. I noticed upon my return, and during the first initial meeting, that Detlor seemed to be in charge of the meetings. Various committees had been created, and I was often uncertain of what was going on within the meeting.
15. Myself and another Clan Mother were often in disagreement of what was taking place throughout the meetings, and upon discussing our disagreements with each other, felt that we were not able to voice our opinions as the Chiefs were very dismissive towards us and seemed to consider us as "trouble makers".
16. The next council meeting was held the following month in, February, 2016. During this meeting, I was shocked to see Detlor stand up with papers in hand, announce that the Chiefs and Clan Mothers had agreed on documents that were passed within the Haudenosaunee Development Institute (hereinafter referred to as "HDI"). The other Clan Mother and I looked at one another and asked one another if we agreed to anything, and we both said we did not agree to anything.
17. The day following the February, 2016 council meeting, a group consisting of myself and approximately 8-10 other group members met to discuss the recent occurrences that took place in council, and to ensure everyone was informed of the new committees being created.
18. The same 8-10 group members would often meet following the monthly council meetings and discuss issues that the members had with Detlor, and his business within the council.

HAUDENOSAUNEE DEVELOPMENT INSTITUTE

19. On or about May 7, 2016, Detlor and the secretary, Leroy Hill informed council that that any title holder (meaning any Chief or Clan Mother) could go up to the HDI offices to get documents, including, any agreements, job descriptions, salaries and employee names.

20. On or about May 27, 2016, I was informed by Shirley, another Clan Mother, (hereinafter referred to as "**Shirley**") and verily believe to be true, that she went to the HDI offices and requested the documents mentioned above, which she ultimately did not receive. She informed me that Detlor told her the requested documents were sent to her email, however she never received the documents as her e-mail crashed, and was inaccessible two (2) days after she requested the documents.
21. Approximately one (1) week later, the Shirley and myself returned to the HDI offices to inquire as to the location of the documents, and were informed that the HDI offices did not have the information requested. Upon being informed of this, we left the HDI offices.
22. Approximately six (6) weeks later, Shirley and I attended the HDI offices again in search of the requested documents. When we were leaving the premises, we were verbally attacked by Brian Doolittle, another named Defendant in this matter (hereinafter referred to as "**Doolittle**") stated "you walk around like a couple of Queens". Detlor was also present during the verbal attack, and did nothing to interfere, or reprimand Doolittle.
23. During the attack, Doolittle stated that the Clan Mothers should be working with HDI, not against him, however the Clan Mothers were his boss. Shirley and myself, informed Doolittle and Detlor that all we requested was accountability and transparency as to where the funds were going.
24. On or about Tuesday, April 26, 2016, Detlor was taken out of his office, and asked to leave forever by the Men's Fire. Attached hereto and marked as **Exhibit "B"** to this my Affidavit is a copy of the news article with respect to the removal of Detlor from Six Nations.
25. The local Six Nations paper, Turtle Island News, when asked who gave permission for Detlor to be removed from him position, named myself. Upon finding this out, I

informed Men's Fire that we, as Clan Mothers, did not condone violence, as this was not the way of our people.

26. At a council meeting on July 2, 2016, a letter came into council for review from the Energy Board, which demanded a letter be sent out on July 4th, 2016 confirming that HDI was still supported 100% by the HCCC. Attached hereto and marked as **Exhibit "C"** to this my Affidavit is a copy of the letter that came in to council for review.
27. I requested that my Chief not agree with the letter as we needed the consensus of the Clan prior to making a decision, which council had not been actively doing for at least the time in which I returned to council in January, 2016.
28. On July 23, 2016, I was shocked to learn that some of the Chiefs had in fact sent out the letter that was opposed at the council meeting. The letter stated that HDI had the full support of the people, which was a lie as it was never in 100% agreement. Further, having the letter sent out when it was opposed is in strict violation of what the council stands for, and further disrespects the families of council.
29. It pains me to go against my Clan members and close friends in writing this Affidavit, as this is not something we should ever partake in, however I believe it is the only way in which to solve the issues at hand.
30. The Great Law states that "we are to stay in each other's boat and only work side by side, taking care of our own issues and them (the white man) taking care of theirs.

FINANCIAL PROPERTY

31. According to the records of the HCCC, the following are the details of HDI's last known bank account:

Haudenosaunee Development Institute

Bank of Montreal

Transit # 3752

Account # 1100-241

32. Given the Plaintiff's investigations to date, I am concerned that funds have been wrongly misappropriated and/or converted by the Defendants and will continue to be used, thereby precluding recovery of the funds properly belonging to the HCCC and the Haudenosaunee people.
33. I am likewise concerned that, the Defendants will dissipate their assets, thereby precluding recovery of the funds believed by HCCC to have been wrongly misappropriated and/or converted by the Defendants.
34. I verily believe that the Defendants are likely to have documents pertaining to the allegations as contained in the Statement of Claim in this herein action; and, in addition or in the alternative, documents allowing the Plaintiffs and/or the Haudenosaunee people to trace misappropriated funds. I verily believe that it is reasonable to believe that any computers or other data devices would contain relevant evidence, as they are likely to contain banking and accounting information that will be relevant to tracing funds, determining further particulars of the alleged misappropriation, and identifying other persons who may have received misappropriated funds.
35. Based on all of the foregoing, I verily believe that the following court orders are justified:
- a. A *Mareva* injunction, which I understand to be an Order that will, at least temporarily, freeze the assets of the Defendants, so that they cannot be dissipated to defeat the claims of the Plaintiffs;
 - b. A *Norwich* order, which I understand to be an Order directing the financial institutions of the Defendants, including the Bank of Montreal to produce to

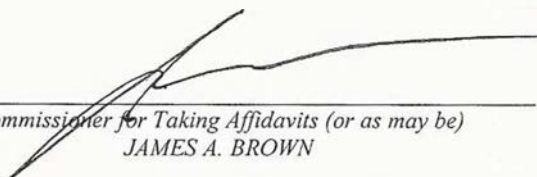
the Plaintiffs their financial records with respect to any bank accounts of the Defendants, including the accounts described above;

- c. An Order directing the Defendants to forthwith deliver up, or make available for a computer forensic company to be retained by the Plaintiffs, any and all computers, smart phones and tablets in their possession, control or power, such that a mirror image of such devices may be produced to obtain or preserve evidence, as it is my belief that such computers will contain evidence of the Defendants misappropriation, including but not limited to the application of such misappropriated funds;
- d. An Order permitting the legal and/or equitable tracing of the Funds;

36. I verily believe that if such Orders are not granted by the Court, in light of the information known to date, as well as the lack of information and documentation available to the Defendants without such Orders, the Plaintiffs and the Haudenosaunee People will suffer irreparable harm.
37. I verily believe that the Defendant's computers and other electronic devices are likely to contain banking and accounting information for the Defendants, which information will be relevant to tracing the Defendant's funds and determining further particulars of the Plaintiff's claims.
38. If granted these orders I am prepared to undertake to be responsible for any reasonable damages that may befall the Defendants, if such damages are ultimately proven, and to undertake to compensate the banking institution, including the Bank of Montreal for any reasonable costs incurred in complying with the Orders sought herein.
39. I understand that, given the nature of the injunctive relief sought from the Court, such injunction may only be valid for a maximum of ten (10) day, unless thereafter extended by the Court upon a motion to extend.

40. I make this Affidavit for the purpose of the within motion for injunctive relief, and for no improper purpose.

SWORN BEFORE ME at the City of Hamilton, Province of Ontario this 28th day of October, 2016



Commissioner for Taking Affidavits (or as may be)
JAMES A. BROWN



JANACE HENRY

BILL MONTURE et al.

-and-

Plaintiffs

HAZEL HILL et al.

Defendants

Court File No. 16-58391

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT
HAMILTON

AFFIDAVIT OF JANACE HENRY

BURNS ASSOCIATES

Barristers & Solicitors
21 King Street West, Suite 305
Hamilton, Ontario
L8P 4W7

JAMES A. BROWN (60941Q)

Tel : 905-522-1381
Fax: 905-522-0855

Lawyer for the Plaintiff,
Bill Monture

THIS IS EXHIBIT " A " TO THE AFFIDAVIT
OF Linace Henry SWORN
BEFORE ME, THIS 28th DAY OF
October, 2010

Commissioner, etc.

James Bran

Grand River Authorization Map (May 2012)

Seneca

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Bear	Linda Logan	Sadyenawat	Darren Jimerson
Hawk	Janine Huff	Sag,'jo:wa:	Stuart Jaimeson
Snipe	Janet Hill	Ganohgi'da:wi:	Roger Hill
Snipe	-Vacant-	Nishayene<nha	-Vacant-
Snipe	-Vacant-	Tsa'degaohyes	-Vacant-
Turtle	Grace Buck	Ga'nogae:	-Vacant-
Turtle	Darlene Jonathan	Sganyadae:yo:	Kervin Jonathan
Wolf	Evelyn Jonathan	Dyoninho'ga'we'	Kenny Jonathan

Registrar: Sue Jacobs, Linda Froman

Domain: All Seneca Citizens on Grand River Enrollment

Cayuga

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Bear	Kathy Smoke	Haga'e,yok	-Vacant- (Son - Benchwarmer)
Bear	-Vacant-	Gada:gwa:se:	Andrew Warner
Bear	Inez Jimerson	Soyo:wi:s	Samuel George
Bear	Carol Jacobs	Desgahe	Steve Jacobs
Deer	Janace Henry	Gaji'nodawehe	Steve Maracle
Heron	Bernadette Hill	Hadoda:he:ha'	William C. Jacobs
Snipe	Mina Keye	Deyohowe:to:	Manfred Miller
Turtle	Julie Bomberry	Hagya;drohne	Blake Bomberry
Wolf	Lori Froman	Deyotowehgoh	Cleveland General
Wolf	-Vacant-	Dyohyo:goh	Samuel General

Registrar: Sue Jacobs, Linda Froman

Domain: All Cayuga Citizens on Grand River Enrollment

Tuscarora

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Beaver			-Vacant-
All Clans			Leo Henry

Registrar: Sue Jacobs, Linda Froman

Domain: All Tuscarora Citizens on Grand River Enrollment

Onondaga

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Beaver	Crystal Laforme	Dehatgahdos	Arnold General
Deer	-Vacant-	Se,:ha:wi:	-Vacant-
Deer	Gloria Thomas	Hahi:hoh	Butch Clause
Deer	Jayne Burning	Gawe,ne,se,:doh	Peter Sky
Eel	Karen Webster	Sagoge,he:	Vince Johnson
Eel	Virginia Abrams	Sodegwa:se,:	-Vacant-
Eel	Francine Bush	Hoyo:ny,nih	Jake Edwards
Eel	NA	Tadodahoh	Sidney Hill
Turtle	Eileen Jacobs	Sganawadih	Arnold Jacobs
Turtle	-Vacant-	Dehayatgwae	-Vacant-
Wolf	Rose Doctor	Honowiyehdi	Alson Gibson
Wolf	Lucille Jamieson	Awe'ge,hyat	Andrew Williams (Toby)
Wolf	Ruby Williams	Honya'daji:wak	Perry Williams (Yogi)
Wolf	Sharon Williams	Gane'se:he:	Kervin Williams

Registrar: Sue Jacobs, Linda Froman

Domain: All Onondaga Citizens on Grand River Enrollment

Oneida

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Bear	Edna Doxtator	Atahu?ta:y	Robert Brown
Bear	Andrea Chrisjohn	Lanyatashat	Luke Doxtator
Bear	Mary Sandy	Owatsa?t tha	-Vacant-
Turtle	Marlene Green	Shonuhses	Alfred Day

Turtle	Marla Summers	Thanahak tha	Robert Antone (Benchwarmer)
Turtle	Deanna Chrisjohn	Atya?tan tha	Arnold Hill
Wolf	Beatrice Nicholas	Otatshehte	Howard Elijah
Wolf	Joanne Summers	Kanukwe?nyo:tu	Robert Ninham Sr.
Wolf	Dawn Chrisjohn	Teyohakw t	-Vacant-

Registrar: Sue Jacobs, Linda Froman

Domain: All Oneida Citizens on Grand River Enrollment

Mohawk

Approver:

Bear	Clan Mother	Chief Title	Chief (English Name)
Bear	Louise McDonald-Herne	Dehharagereneh	Curtis Nelson
Bear	-Vacant-	Rastawehserondah	-Vacant-
Bear	-Vacant-	Sosskoharowaneh	-Vacant-
Turtle	Shirley Hill	Ayonwatha	Joe Skye
Turtle	-Vacant-	Tehkarihoken	Allen MacNaughton
Turtle	-Vacant-	Sadekariwadeh	-Vacant-
Wolf	Angela Elijah	Sahrehowaneh	Ernest David
Wolf	Kawisenhawe Thompson	Orenrehgowah	Howard Thomson
Wolf	-Vacant-	Deyonhehgiveh	-Vacant-

Registrar: Sue Jacobs, Linda Froman

Domain: All Mohawk Citizens on Grand River Enrollment

THIS IS EXHIBIT "B" TO THE AFFIDAVIT
OF Juanice Henry SWORN
BEFORE ME, THIS 28th DAY OF
October, 2016

Commissioner, etc.

Jane Bran

NEWS BRANTFORD-BRANT

Lawyer is forced out on Six Nations



By Michael-Allan Marion, Brantford Expositor
Tuesday, April 26, 2016 7:54:27 EDT PM



Lawyer Aaron Dettlor is evicted Tuesday morning from the HDI office in the GREAT building on Six Nations. An HDI official says the action was staged for the media. (Photo courtesy of Two Row Times)

OHSWEKEN - A lawyer working for the Haudenosaunee Development Institute was forced out of its offices Tuesday morning by a group from an organization called Six Nations Men's Fire.

The incident was captured on video and in photographs by local media, actions described by an official of the HDI as being staged for the media.

Video footage from the Two Row Times weekly newspaper, posted on its website, shows several males - some of them Men's Fire members led by Bill Monture - confronting Mohawk lawyer Aaron Dettlor in the office in the Grand River Education and Training building on Sunrise Court, Ohsweken, shortly after 10 a.m.

Dettlor was told to leave Six Nations.

When he refused, the video and photographs show he was physically removed from the office, his belongings and his briefcase were handed to him and he was escorted out of the building.

After speaking to Six Nations police officers, Dettlor got into his car and drove away, the video footage shows.

"I was assaulted today by a number of males who did not have a reason to do it," Detlor said in a telephone interview.

"It is now in the hands of the police. Since it is subject to investigation, I have no further comment at this time."

The HDI is the planning arm of the Haudenasaunee Confederacy Chiefs Council. It evaluates planning applications for development.

HDI director Hazel Hill posted a message on Facebook relating what she witnessed Tuesday morning.

"The men carried Detlor outside demanding he leave the community saying they were acting on behalf of a Cayuga clan mother," her posting said.

"That's nonsense. The so-called 'Men's Fire,' in collusion with the Two Row Times, staged a violent assault upon Mohawk lawyer Aaron Detlor, a legal adviser to the HCCC, today in a mob-styled assault with no explanation for why they attacked him.

"The only clanmother at the scene was a Cayuga clanmother who denied any knowledge of their claims to have been directed by Cayuga clanmothers. The Six Nations police were on site after I called them to attend to keep the peace and protect Mr. Detlor and our staff as the men's behaviour was both intimidating and threatening."

The post was published with a story and photos on the website of the Turtle Island News newspaper.

Two Row Times publisher Jonathan Garlow rejected the claim that the newspaper participated in a staged event.

"We didn't know about it until this morning when we got a tip," he said. "We went out and covered it like any news story. We're a news agency. We don't make the news, we report on it."

Six Nations police issued a short news release relating to their involvement in the incident.

"Upon their arrival, police learned that a meeting had been disrupted by members of the Men's Fire that were demanding that an attorney i attendance at the meeting leave the territory," the release said.

"The Six Nations police officers were able to obtain the co-operation of the parties involved and kept the situation from escalating."

The incident remains under investigation and police "will be speaking to a number of witnesses," the release continues.

Anyone with information is asked to contact police at 519-445-2811.

The Men's Fire and the HDI have differing explanations concerning what caused Detlor's removal.

Monture said in an interview that the group was asked by members of the community to have Detlor removed over complaints that the HDI operations and finances were being run in a way that the organization "is not accountable" to the community.

"They were handpicking people to sit on a board dealing with finances," he said.

"Being traditional we don't hide things from our people. We are open. The concept of (the HDI) is good but they have the wrong people working there."

Monture said he is happy to speak with police about the incident because he believes Tuesday's actions were not violent.

MMarion@postmedia.com

Twitter.com/EXPMarion

Recording
Audio Plug-Ins



C

THIS IS EXHIBIT "C" TO THE AFFIDAVIT
OF Linace Henry SWORN
BEFORE ME, THIS 28th DAY OF
October, 2016

Commissioner, etc.

James Bram,

JULY 6TH 2016 TWO ROW TIMES

OP-ED

Cars and weather



By Cary Farmer

Traffic deaths surged last year as drivers rackled up more miles behind the wheel than ever before, a result of an improved economy and lower gas prices, according to preliminary government data released Friday here in the U.S.

That was the leading sentence in a LA Times story this week.

I just drove across the continent for my latest trip home from Santa Fe, New Mexico to the Six Nations along the Grand River. A trip of some 5,000 miles. Now that was a lot of emissions! It was also the year in which American drove 3.1 trillion miles. More than ever be-

fore. We love our "war ponies", says Philbert when referring to his beaten down 66 Buick Wildcat in the Native American film classic, Powwow Highway. Of course, we had no problem with the transition of horse to car — we just didn't know what to do with 'em after we was done with 'em, so we just left 'em in the yard — like a pony.

In fact, here in North America many cities were built around the location of cars. No bigger car cities than Los Angeles, CA or Phoenix, AZ, where if you don't drive 20 mph over the speed limit you're harassed by drivers, horns blowing as they race past with middle fingers raised like old glory. The world is faster paced than ever before.

I was born at the end of the American industrial age. A post World War II time of prosperity that soon became the beginning of endless wars. I didn't have a choice in the

matter to be born into this laborious struggle to survive. In 1950 being a soldier was how you got your start in life, you could learn a trade. Indians were the migrant workers of this industrial age. My father and my father's father built America — as did all the immigrant families that flowed to North America.

You could say that children today are born into the age of global communication. IBM and Mac computers with software for every notion. Social media at masses: FB, twitter, snapchat, your games galore — instant gratification. The commodification and consumption of your own personal life. I would say this creates a throw away life.

But from the '50s on so much of what we helped to create is a problem today in the staggering amount of pollution — all the cancer in our bodies is from this age of industrial technology. The damming of waterways and flood-

ing of land, the quest for wealth in minerals, coal, oil, diamonds and rare earth elements used in the manufacture of computer components has enormous impact on all our lives. But as long as we had the latest model car or any moving vehicle that gave us some feeling of freedom everything was alright. Everybody was smoking and drinking like there was no tomorrow. Well tomorrow is now.

Now we recognize these health risks. We always learn about the health implications after the fact. Like we won't know the impact of the age of communication till 20 plus years down the road. "Yeah, she had a cellphone to her ear her whole life" or, "He never went outside, only on that computer he just lost touch with the natural world". This is disease.

The automobile, a 20th century invention — the ultimate industrial age product with the gas/diesel combustion engine is one the many problems.

Recently in England they began attempting to outlaw any cars 1995 or older. So if you are driving a car 1995 or older you

are breaking the law and you'll be fined. Imagine that law on Six Nations today? That'd be half of us — we still leave our cars idling while we go visit or drop off the kids. Leave the pony idling and leak CO2 into the atmosphere.

A large and impressive group of scientists signed a letter to U.S. Congress recently. This included the American Association for the Advancement of Science (AAAS), whose CEO, Ruth Holt, is a former congressman from New Jersey and a physicist by training, as well as the American Geophysical Union (AGU) and American Chemical Society and 15 other organizations including meteorologists — the weatherman.

"Climate change is real and happening now, and the United States urgently needs to reduce greenhouse gas emissions," Holt said in a statement.

"We must not delay, ignore the evidence, or be fearful of the challenge. America has provided global leadership to successfully confront many environmental problems, from acid rain to the ozone hole, and we can do it again. We owe no less to

future generations."

Cars that lack such systems will be targeted for being lawless — and unsafe. Since it will be economically and otherwise unfeasible to retrofit older cars with this stuff — just like modern anti-pollution equipment — the result will be a very effective indirect ban on older cars. It's inescapable.

Naturally, there is not too much political will to do this — it'd be worse than trying to take people's guns away cause they're shooting each other too much. But it's becoming obvious that we are going have to change in the near future as world citizens, as individuals, or we'll simply die off.

We need to become the change that is needed and that's hard to imagine living on the economic high rise of no job, no car, no phone in your ear, no food in our unless we learn to self sustain. It's individual leadership not government that's going to protect us when we are so addicted to profit and bottom line mentality to stop.

It's going to be up to us to make it all better. What are each of us prepared to do?



Since the various reports in local & outside papers, the HDI has been asked by various developers for an updated letter from this council that verifies that HDI is still functioning and has the full support of this council.

Decision required: That this council authorize Hohahes to draft and provide a letter to the HDI and that it be made available to HDI for Monday July 4, 2016.

Grand Valley Wind Farm Project

The Ontario Crown requires a letter confirming that Haudenosaunee Confederacy Chiefs Council ("HCCC") still owns a 10% indirect interest in Grand Valley 2 Limited Partnership. According to the partnership agreements HCCC will receive 40% of the incremental benefit of the Aboriginal Price Adder.

Decision Required: That this council authorize Hohahes to draft and provide a letter to the HDI and that it be made available to HDI for Monday July 4, 2016

After hearing submissions, by motion
to remain on the list as per
earlier endorsement

→ especially it was noted that adjournment
was "permitted" in pleadings

Harper

APRIL 26 2017 Mr Brown - PL's Adjournment Request
Mr Shalla Def's Oral ruling provided

N/W the matter is marked peremptory - This is a class
proceedings matter and must be dealt with by a designated

class proceedings judge. While I was prepared to deal

with the discrete Mareva Injunction issue, PL counsel was strongly
opposed based on the principles found in Baxter v. O'Hara (AG) 2005 OJ No 2161

(SC) 15 IM 45 9+12. Judicial economy and efficiency demand that I adjourn the

Mareva issue. I am to hope that the Def will seek to set aside default

judgment in two other defendants. Low circumstances are required to

complete the record with respect to the class proceeding orders. Counsel may send an

Agreed - 4 p.m. draft procedural order for my signature - Counsel are to contact

(within 48 hrs) - the Regent Senior Judge's office to arrange for a class
proceedings judge to be assigned and hearing dates to be set ASAP.

I note that the defendant will not appear in person at this time as

As they are still under business - no injunction has been granted

The Mareva injunction motion is adjourned since the returnable is

10 days notice. Balance of issues to be scheduled.

Costs to the defendant for costs thrown away on February 23 April 11

and born due to Plaintiff's motion fixed to \$3500 ?? (All incl)
within 30 days.

Attest: [Signature]

see head:

- 1) the plaintiff's motion for a Mareva injunction;
- 2) the plaintiff's motion for a Norwich Order;
- 3) the plaintiff's motion for certification of the action as a class action.

This is necessary upon the plaintiff's. The plaintiff shall serve and file this motion on or before March 8th 2017. Costs of today are served to the judge by the motion. Estimate is 1 day.

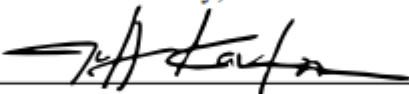
Am 11, 2017 ~~2017~~

Mr Braun for the plaintiffs
Mr Skulley for the defendants.

This was a requested adjournment request. Mr Braun wanted a further adjournment & Mr Skulley resisted on basis of Parayock's D's endorsement of Feb 23, 2017. ← over

EXHIBIT E

This is Exhibit "E" to the Affidavit of
Wilfred Davey, sworn this 6th day of
January, 2023



Commissioner for Taking Affidavits



December 3, 2022

Objection Letter to HDI' Court Motion

We, the Loti sk^laketeh (Men's Council of Oneida of the Thames) would like to clearly state our strong objection to the request the HDI is to be named the official Land Negotiator or Stewards of all lands within the Beaver Territory as outlined in 1701 Treaty(Montreal).

The Loti sk^laketeh are upholding our duties and responsibilities bestowed upon us within K^nthukwanhasta (People's Circle Wampum) and following the protocols outlined in Kayatikowa (Great Law). We write this letter to remind the incorporated entities, one, the Band Administration Chief and Council (INAC) and two, the Haudenshaunee Development Institute (HDI), that both entities are not in our circle and that you both are under the Crown of England and their Corporation Canada. We also remind you that you have no business negotiating within yourselves, Haudenshaunee issues that include land negotiations, as you do not have the authority of the Clan families, their heirs and descendants, because of this you do not have their best interest at heart. Let us remind you that corporations do not have land (ownership), clan families, clan titles, language, songs, ceremonies as all of these things belong inside the K^nthukwanhasta (Peoples Circle Wampum).

Loti sk^laketeh have the responsibility to maintain our duties and responsibilities as our role is outlined within K^nthukwanhasta and Kayatikowa to protect our women, children, homelands, language, our way of life and everything else that makes us who we are as Haudenshaunee.

HDI have removed themselves from our circle wampum and therefore no longer have the protection of the clan families, their titles and they do not have the authority to engage in land issues or any business that will try to assimilate our culture, our language and our very existence as Haudenshaunee. Loti sk^laketeh will also remind Band Administration Chief and Council that your only role is to administrate for the people as you were appointed by the Federal Government (INAC).

In closing, the Loti sk^laketeh (Men's Council of Oneida of the Thames) are in full agreement and stand united with the Hodiskeagehda (Men's Fire of the Grand River Territory) in our strong objection to HDI and Band Administration Chief and Council request to be named the official Land Negotiator or Stewards of all Land Claim Issues within the Haldimand Tract.

Kayatlkowa
K^n thyokwanhasta
Two Row Wampum
Silver Covenant Chain
1701 Nanfan

Wolf Clan

Channin R. George

Latkwewes
Thoha kwat

Turtle Clan

Hunter Nicholas

Shakotalan

Bear Clan

Braeden Chris Joh

laji kuk kwamansata



SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS
Plaintiff

-and-

THE ATTORNEY GENERAL OF CANADA *et al.*
Defendants

Court File No. CV-18-594281

ONTARIO
SUPERIOR COURT OF JUSTICE
PROCEEDING COMMENCED AT
TORONTO

AFFIDAVIT OF WILFRED DAVEY

JEFFREY KAUFMAN LAW
Professional Corporation
15 Prince Arthur Ave., Suite 200
Toronto, ON M5R 1B2

Jeffrey Kaufman (LSO #21717N)
Tel: 416-400-4158
Fax: 416-964-6662

Lawyers for the Moving Party, the Men's Fire of the Six
Nations Grand River Territory

TAB 3

Court File No. CV-18-594281

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS

Plaintiff

and

**THE ATTORNEY GENERAL OF CANADA and HER MAJESTY THE QUEEN IN
RIGHT OF ONTARIO**

Defendants

-and-

**THE HAUDENOSAUNEE THE HAUDENOSAUNEE DEVELOPMENT INSTITUTE
(AARON DETLOR AND BRIAN DOOLITTLE), AS APPOINTED BY THE
HAUDENOSAUNEE CONFEDERACY CHIEFS COUNCIL, ON BEHALF OF THE
HAUDENOSAUNEE CONFEDERACY**

Moving Party

AFFIDAVIT OF PAUL DELARONDE

I, PAUL DELARONDE, of the community of Six Nations, Grand River Territory in Haldimand County, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

A. Introduction

1. In this affidavit, I describe in detail the processes and laws of the Haudenosaunee Confederacy found in the Great Law of Peace (“Gayanashagowa”), the oral constitution of the Haudenosaunee, found in the following link:

https://web.pdx.edu/~caskeym/iroquois_web/html/greatlaw.html.

I appeal to the Great Law to demonstrate the insufficiency of The Haudenosaunee Development Institute's ("HDI") claim to intervene in this action as a representative of the Haudenosaunee Confederacy and an advocate for the interests of the Haudenosaunee people, the true collective rights-holders in this action.

B. Background

2. I am an elder from Kahnawake, and an expert in Traditional Haudenosaunee Governance and the Great Law. I was raised and educated in the Haudenosaunee ways by my grandparents who taught me the traditional language and ways from a young age. My grandfather sat on the council in the longhouse as Bear Clan Chief and my grandmother was utilized by the Bear clan family to be an acting clanmother. I sat in council as a Sub-Chief for almost three years and have been invited around the world to speak at various lectures and conventions as a spokesperson for the Haudenosaunee and an expert on topics pertaining to the Great Law. I have been deemed an expert witness in Haudenosaunee Land Governance in Canadian court by Honorable Justice Boruque and have been previously qualified as an expert in Traditional Indian Governance in court proceedings in New York. I have acquired much of my expert knowledge directly from elders and leaders from the Grand River community and have previously testified on matters regarding the role and responsibility of the men, women, chiefs, and clan mothers in the confederacy.

3. I am a member of the Mohawk Nation, fluent in the Mohawk language, and an interpreter of the Great Law in both Mohawk and English. As such, I have knowledge of the matters in this affidavit.

C. The Haudenosaunee Confederacy and the Six Nations of the Grand River Territory

4. The Haudenosaunee Confederacy, meaning people of the long house, formerly and unofficially referred to as the Iroquois Confederacy, is a union of Indigenous nations made up of the Mohawks, Oneidas, Onondagas, Cayugas, Senecas, and later the Tuscarora located on traditional territories across what is now Canada and the United States. The Confederacy was brought about as a result of the Great Law of Peace, intended to unite the nations and create a peaceful means of decision-making. Traditional governance within the Haudenosaunee Confederacy is primarily carried out by each nation independently. Each nation maintains its own council with Chiefs chosen by the Clan Mother and deals with its own internal affairs. However, in broader matters and affairs affecting the nations of the confederacy authority is granted to the Grand Council.

5. Upon confederation each of the nations took on a role within the metaphorical longhouse which symbolizes the Haudenosaunee. The Onondaga act as the Keepers of the Fire. The Mohawk, Seneca, and Onondaga act as the Elder Brothers of the confederacy while the Cayuga and Oneida act as the Younger Brothers within the Grand Council.

6. The Six Nations of the Grand River is a community of Haudenosaunee people made up of peoples from the Six Nations of the confederacy who settled on a tract of land granted by the Haldimand Proclamation of 1784 and confirmed by the Simcoe Patent of 1793. The reserve on the Haldimand Tract was granted by the Crown to the Six Nations of the Grand River. The reserve created by the Crown only accounts for a small percentage of the original land area that was granted to the Six Nations of the Grand River by the Haldimand Proclamation. This action, and the motions to intervene, are concerned with compensation and an accounting of what happened to the property, money, and other assets within the Haldimand Tract.

D. The Great Law of Peace

7. Among the Haudenosaunee the Great Law of Peace, also known as the Gayanashagowa, is the oral constitution of the Haudenosaunee Confederacy. According to Haudenosaunee tradition, the confederacy has been in place since time immemorial. The Peacemaker, sent by the Creator, taught the Great Law of Peace to the Haudenosaunee with the help of Aiionwatha, commonly known as Hiawatha. Travelling from community to community they both persuaded the Chiefs of each nation to form a confederacy of nations, known as the Great League of Peace.

8. The Peacemaker asked the Clan Mothers of each tribe to present their Chiefs and placed deer antlers on the heads of the Chiefs to symbolize their authority to the nations. The Mohawks had nine Chiefs of the bear, wolf, and turtle clans. The Oneida also had nine of the bear, wolf, and turtle clans. The Onondaga had 14 of the turtle, snipe, bear, hawk, deer, wolf, eel, and beaver clans. The Cayuga had 10 from the heron, deer, turtle, bear and snipe clans. The Seneca had 8 from the bear, snipe, turtle, wolf, and hawk clans. The nations accepted the longhouse as a symbol of their unity.

9. In in the Onondaga community the Peacemaker planted a tree which it called the “Great Tree of Peace”. He instructed the Chiefs of the council to sit beneath the shade of the tree and watch the council fire of the confederacy. He directed the Chiefs to discuss and deliberate all issues concerning the confederacy under this tree.

10. The Peacemaker took an arrow from each of the five nations and bound them together. Through this act the nations were united in their powers and the union was made complete. Each nation retained their own council with Chiefs chosen by Clan Mothers of families holding hereditary rights. The rights and duties of Chiefs are explained to them as they stand up to act as Chiefs and it is the Clan Mother who maintains the moral obligations of the Chiefs and keeps them on a straight path.

11. The Great Law was written on wampum belts and was recorded and transmitted not in written language but by means of wampum symbols which conveyed various meanings. Later translated into English and other languages, including several Mohawk language versions, the constitution is made up of 117 articles which form the base of the Haudenosaunee legal tradition. Each nation plays a delineated role in the conduct of Haudenosaunee governance which is prescribed by the Great Law. The Great Law extends beyond the purpose of providing a constitution of laws, it also provides ceremonies for social organization and a narrative which binds together the history of the Haudenosaunee peoples.

E. The Governance Structure of the Haudenosaunee Confederacy and the Decision-Making Process of the Grand Council as Described in the Great Law of Peace

12. The Haudenosaunee has since time immemorial maintained a governance structure comprised of Clan Mothers and Chiefs which is described in the Great Law.

13. The Chiefs of each clan are nominated to step up as Chief by a Clan Mother. The Chief then goes on to represent that clan in the Grand Council. A Chief sits as a member of the Grand Council for life once confirmed, lest they are removed by their Clan Mother for not fulfilling their duties.

14. The Grand Council is the collective council wherein all of the Haudenosaunee Confederacy's Chiefs meet to make determinations which affect the entirety of the Haudenosaunee peoples and their interests. This Grand Council and its operations are described in the Great Law and has functioned for centuries, before European contact, and is the ultimate governing authority for the Haudenosaunee people. All articles of the Great Law referenced herein are attached under **Exhibit "A"**.

15. According to article 28 of the Great Law, it is the duty of the Grand Council to make its deliberations on the basis of both the warnings of past generations and the welfare of future generations yet to come.
16. The Grand Council is made up of a wampum circle in which the 50 Chiefs of the various clans sit. It is only through the unanimity of the 50 clans and their Clan Mother appointed Chiefs who serve as their representatives that the Grand Council can pass a final decision. The circle wampum of the 50 clans as well as other facets described herein of traditional Haudenosaunee governance, including a list of previous participants at Grand Council, are illustrated visually in diagrams and tables attached at **Exhibit “B”**.
17. Debates before the Grand Council Fire of the Haudenosaunee are conducted in the following manner. The Chiefs of the Onondaga Nation serve as the Council’s Firekeepers and are responsible for hearing the matters of the Haudenosaunee, who sit between the Elder Brothers and Younger Brothers. The Firekeepers shall then propose an issue for discussion. Each issue must be unanimously agreed upon by the Grand Council.
18. Once an issue of particular importance is agreed upon for discussion, the Elder Brother Chiefs of the Seneca and Mohawk Nation shall introduce the issue to the Council. They shall then pass the issue to Younger Brother Chiefs of the Oneida and Cayuga Nation (including the Chiefs of the Tuscarora Nation who speak through the Oneidas in Council).
19. The Younger Brothers shall then discuss the standing issue. After deliberating upon the standing issue, the Chiefs of the Younger Brothers will then either support the resolution or ask the Elder Brother Chiefs to reconsider their position with the recommendations of the Younger

Brothers in mind. If both sides of the house become of one mind, the Elder Brothers shall then pass the standing issue to the Firekeepers of the Onondaga Nation to further discuss the matter.

20. After deliberating upon the standing issue, the Firekeepers will then either confirm the resolution or ask the Elder Brothers and Younger Brothers to reconsider their position with the recommendations of the Firekeepers in mind. The Council shall continue to deliberate in this fashion until they come to one mind through consensus building.

21. The process of consultation which is required by the Great Law to reach such unanimity among the clans and their representatives is comprehensive. The process is described in articles 93 through 98 under a section entitled the “Rights of the People of the Five Nations”.

22. These rights concern a meeting of the Grand Council in which a “specially important matter” which “affects the entire body of the Five Nations” is being deliberated. Under these circumstances, the Chiefs must “submit the matter to the decision of their people”. The ultimate decision of the Grand Council “shall be a confirmation of the voice of the people.”

23. Articles 94 and 95 state that both the men and women of every clan shall each have a council fire wherein if “in their opinion it seems necessary for the interest of the people they shall hold a council and their decisions and recommendations shall be introduced” before the Chiefs of the Grand Council.

24. The final article under the Rights of the People of the Five Nations is key for considering the traditional justification for the intervention of the Men’s Fire of the Grand River Territory (“Men’s Fire”) to oppose the appointing of the HDI as a delegate of the Haudenosaunee Confederacy Chiefs Council (“HCCC”). Article 98 states:

“If either a nephew or a niece see an irregularity in the performance of the functions of the Great Peace and its laws, in the Confederate Council or in the conferring of Lordship titles in an improper way, through their War Chief they may demand that such actions become subject to correction and that the matter conform to the ways prescribed by the laws of the Great Peace.”

25. Article 98 provides the traditional Haudenosaunee legal basis for an intervention to oppose the appointment of HDI on the basis it has, through irregular means, sought to improperly establish itself as the legitimate delegate of the Haudenosaunee Confederacy and its people. The appointment of HDI by the HCCC constitutes an irregular and improper performance of the Great Law, and will be elaborated upon below.

26. It is also vital to examine the articles of the Great Law which concern the land and its ownership, which is undoubtedly a crucial matter both in this action, the intervening motions, and in the eyes of the decisionmakers of the Grand Council who would naturally defer any decisions involving land claims to the people, the collective rights-holders.

27. Article 44 of the Great Law states that “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 the mother.” This article establishes that women, above all else, have ownership over and responsibility for the land and should in turn be a critical part of any decision-making process which involves land claims or disputes.

28. Article 73 of the Great Law states that “the soil of the earth from one end of the land to the other is the property of the people who inhabit it. By birthright the Ongwehonweh (original beings) are the owners of the soil which they own and occupy and none other may hold it. The same law has been held from the oldest times.” This article further clarifies that the land itself belongs to the people. Decisions regarding the lands identified in the Haldimand Proclamation and any compensation related to those lands should be made not only by the Chiefs at the Grand

Council but also through consultation of the people, and the Clan Mothers, who are by traditional rights the owners of the land.

F. The Appointment of HDI by HCCC was not in accordance with the Great Law

29. I was consulted by the Men's Fire with respect to the appointment of HDI by the HCCC and have reviewed and do verily believe that the HCCC, the council of hereditary Chiefs of the Haudenosaunee, failed to operate according to the traditional guidelines of governance set forth in the Great Law and outlined above. And as a result, have no authority to represent the Haudenosaunee people in this matter.

30. The HCCC, which claims to and intends to represent the people, appointed HDI as its representative without the knowledge and consent of the people. The 50 clans, their families, women, and Clan Mothers, were not consulted and involved in a collective decision-making process which is prescribed in the Great Law of Peace when dealing with matters of critical importance to the nations of the Haudenosaunee Confederacy such as land related disputes.

31. Failure to consult the people, and especially the women, of the Haudenosaunee on an issue regarding the land is particularly glaring considering the emphasis placed on collective ownership of the land in the Great Law. It is not the right of the HCCC alone, or the limited number of Chiefs who were present at the meeting in which HDI was appointed, to make decisions over land which ought to be made collectively and unanimously as a confirmation of the voice of the people in accordance Haudenosaunee traditions as outlined in the Great Law.

32. Article 6 of the Great Law states that:

“I, Dekanawidah (Great Peacemaker), appoint the Mohawk Lords the heads and the leaders of the Five Nations Confederacy. The Mohawk Lords are the foundation of the Great Peace and it shall, therefore, be against the Great Binding Law to pass

measures in the Confederate Council after the Mohawk Lords have protested against them. No council of the Confederate Lords shall be legal unless all the Mohawk Lords are present.”

33. The Mohawks have nine clans who ought to be represented at the Grand Council to provide unanimous assent in the decision-making process prescribed by the Great Law.

However, only 1 representative of the Mohawk was present at the HCCC to determine whether or not HDI should be appointed. Moreover, the Majority of the population of the Six Nations of the Grand River are Mohawk and the Great Law states explicitly that any council of Chiefs (Confederate Lords) shall be legal unless all of the Mohawk Chiefs are present.

34. It is equally important to note that HDI cannot function as a legitimate representative of the Haudenosaunee people and confederacy as it has left the wampum circle and no longer has any jurisdiction in traditional Haudenosaunee legal contexts as a result of being an incorporated entity in Ontario.

35. As a provincially incorporated entity, HDI has left the circle of the 50 clan families which makes up the circle wampum in which ultimate decision-making authority rests for the Haudenosaunee people. This principle is explained in article 58 of the Great Law which states:

“There are now the Five Nations Confederate Lords standing with joined hands in a circle. This signifies and provides that should any one of the Confederate Lords leave the council and this Confederacy his crown of deer’s horns, the emblem of his Lordship title, together with his birthright, shall lodge on the arms of the Union Lords whose hands are so joined. He forfeits his title and the crown falls from his brow but it shall remain in the Confederacy.”

“A further meaning of this is that if any time any one of the Confederate Lords choose to submit to the law of a foreign people he is no longer in but out of the Confederacy, and persons of this class shall be called “They have alienated themselves.” Likewise, such persons who submit to laws of foreign nations shall forfeit all birthrights and claims on the Five Nations Confederacy and territory. You, the Five Nations Confederate Lords, be firm so that if a tree falls on your joined arms

EXHIBIT A

This is Exhibit "A" to the Affidavit of
Paul Delaronde, sworn this 6 day of
January, 2023



Commissioner for Taking Affidavits

Great Law Excerpts

The Appointing of the Mohawk

6. I, Dekanawidah, appoint the Mohawk Lords the heads and the leaders of the Five Nations Confederacy. The Mohawk Lords are the foundation of the Great Peace and it shall, therefore, be against the Great Binding Law to pass measures in the Confederate Council after the Mohawk Lords have protested against them.

No council of the Confederate Lords shall be legal unless all the Mohawk Lords are present.

Unanimity in Decision-Making Process

8. The Firekeepers shall formally open and close all councils of the Confederate Lords, and they shall pass upon all matters deliberated upon by the two sides and render their decision. Every Onondaga Lord (or his deputy) must be present at every Confederate Council and must agree with the majority without unwarrantable dissent, so that a unanimous decision may be rendered. If Adodarhoh or any of his cousin Lords are absent from a Confederate Council, any other Firekeeper may open and close the Council, but the Firekeepers present may not give any decisions, unless the matter is of small importance.

9. All the business of the Five Nations Confederate Council shall be conducted by the two combined bodies of Confederate Lords. First the question shall be passed upon by the Mohawk and Seneca Lords, then it shall be discussed and passed by the Oneida and Cayuga Lords. Their decisions shall then be referred to the Onondaga Lords, (Fire Keepers) for final judgement. The same process shall obtain when a question is brought before the council by an individual or a War Chief.

10. In all cases the procedure must be as follows: when the Mohawk and Seneca Lords have unanimously agreed upon a question, they shall report their decision to the Cayuga and Oneida Lords who shall deliberate upon the question and report a unanimous decision to the Mohawk Lords. The Mohawk Lords will then report the standing of the case to the Firekeepers, who shall render a decision as they see fit in case of a disagreement by the two bodies, or confirm the decisions of the two bodies if they are identical. The Fire Keepers shall then report their decision to the Mohawk Lords who shall announce it to the open council.

11. If through any misunderstanding or obstinacy on the part of the Fire Keepers, they render a decision at variance with that of the Two Sides, the Two Sides shall reconsider the matter and if their decisions are jointly the same as before they shall report to the Fire Keepers who are then compelled to confirm their joint decision.

12. When a case comes before the Onondaga Lords (Fire Keepers) for discussion and decision, Adodarho shall introduce the matter to his comrade Lords who shall then discuss it in their two bodies. Every Onondaga Lord except Hononwiretonh shall deliberate and he shall listen only. When a unanimous decision shall have been reached by the two bodies of Fire Keepers, Adodarho shall notify Hononwiretonh of the fact when he shall confirm it. He shall refuse to confirm a decision if it is not unanimously agreed upon by both sides of the Fire Keepers.

Rights, Duties and Qualifications of Lords

28. When a candidate Lord is to be installed he shall furnish four strings of shells (or wampum) one span in length bound together at one end. Such will constitute the evidence of his pledge to the Confederate Lords that he will live according to the constitution of the Great Peace and exercise justice in all affairs.

When the pledge is furnished the Speaker of the Council must hold the shell strings in his hand and address the opposite side of the Council Fire and he shall commence his address saying: "Now behold him. He has now become a Confederate Lord. See how splendid he looks." An address may then follow. At the end of it he shall send the bunch of shell strings to the opposite side and they shall be received as evidence of the pledge. Then shall the opposite side say:

"We now do crown you with the sacred emblem of the deer's antlers, the emblem of your Lordship. You shall now become a mentor of the people of the Five Nations. The thickness of your skin shall be seven spans—which is to say that you shall be proof against anger, offensive actions and criticism. Your heart shall be filled with peace and good will and your mind filled with a yearning for the welfare of the people of the Confederacy. With endless patience you shall carry out your duty and your firmness shall be tempered with tenderness for your people. Neither anger nor fury shall find lodgment in your mind and all your words and actions shall be marked with calm deliberation. In all of your deliberations in the Confederate Council, in your efforts at law making, in all your official acts, self interest shall be cast into oblivion. Cast not over your shoulder behind you the warnings of the nephews and nieces should they chide you for any error or wrong you may do, but return to the way of the Great Law which is just and right. Look and listen for the welfare of the whole people and have always in view not only the present but also the coming generations, even those whose faces are yet beneath the surface of the ground—the unborn of the future Nation."

Clans and Consanguinity

44. 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 the mother.

Official Symbolism

58. There are now the Five Nations Confederate Lords standing with joined hands in a circle. This signifies and provides that should any one of the Confederate Lords leave the council and this Confederacy his crown of deer's horns, the emblem of his Lordship title, together with his birthright, shall lodge on the arms of the Union Lords whose hands are so joined. He forfeits his title and the crown falls from his brow but it shall remain in the Confederacy.

A further meaning of this is that if any time any one of the Confederate Lords choose to submit to the law of a foreign people he is no longer in but out of the Confederacy, and persons of this class shall be called "They have alienated themselves." Likewise such persons who submit to laws of foreign nations shall forfeit all birthrights and claims on the Five Nations Confederacy and territory. You, the Five Nations Confederate Lords, be firm so that if a tree falls on your joined arms it shall not separate or weaken your hold. So shall the strength of the union be preserved.

Rights of Foreign Nations

73. The soil of the earth from one end of the land to the other is the property of the people who inhabit it. By birthright the Ongwehonweh (Original beings) are the owners of the soil which they own and occupy and none other may hold it. The same law has been held from the oldest times. The Great Creator has made us of the one blood and of the same soil he made us and as only different tongues constitute different nations he established different hunting grounds and territories and made boundary lines between them.

Rights of the People of the Five Nations

93. Whenever a specially important matter or a great emergency is presented before the Confederate Council and the nature of the matter affects the entire body of the Five Nations, threatening their utter ruin, then the Lords of the Confederacy must submit the matter to the decision of their people and the decision of the people shall affect the decision of the Confederate Council. This decision shall be a confirmation of the voice of the people.

94. The men of every clan of the Five Nations shall have a Council Fire ever burning in readiness for a council of the clan. When it seems necessary for a council to be held to discuss the welfare of the clans, then the men may gather about the fire. This council shall have the same rights as the council of the women.

95. The women of every clan of the Five Nations shall have a Council Fire ever burning in readiness for a council of the clan. When in their opinion it seems necessary for the interest of the people they shall hold a council and their decisions and recommendations shall be introduced before the Council of the Lords by the War Chief for its consideration.


96. All the Clan council fires of a nation or of the Five Nations may unite into one general council fire, or delegates from all the council fires may be appointed to unite in a general council for discussing the interests of the people. The people shall have the right to make appointments and to delegate their power to others of their number. When their council shall have come to a conclusion on any matter, their decision shall be reported to the Council of the Nation or to the Confederate Council (as the case may require) by the War Chief or the War Chiefs.

97. Before the real people united their nations, each nation had its council fires. Before the Great Peace their councils were held. The five Council Fires shall continue to burn as before and they are not quenched. The Lords of each nation in future shall settle their nation's affairs at this council fire governed always by the laws and rules of the council of the Confederacy and by the Great Peace.

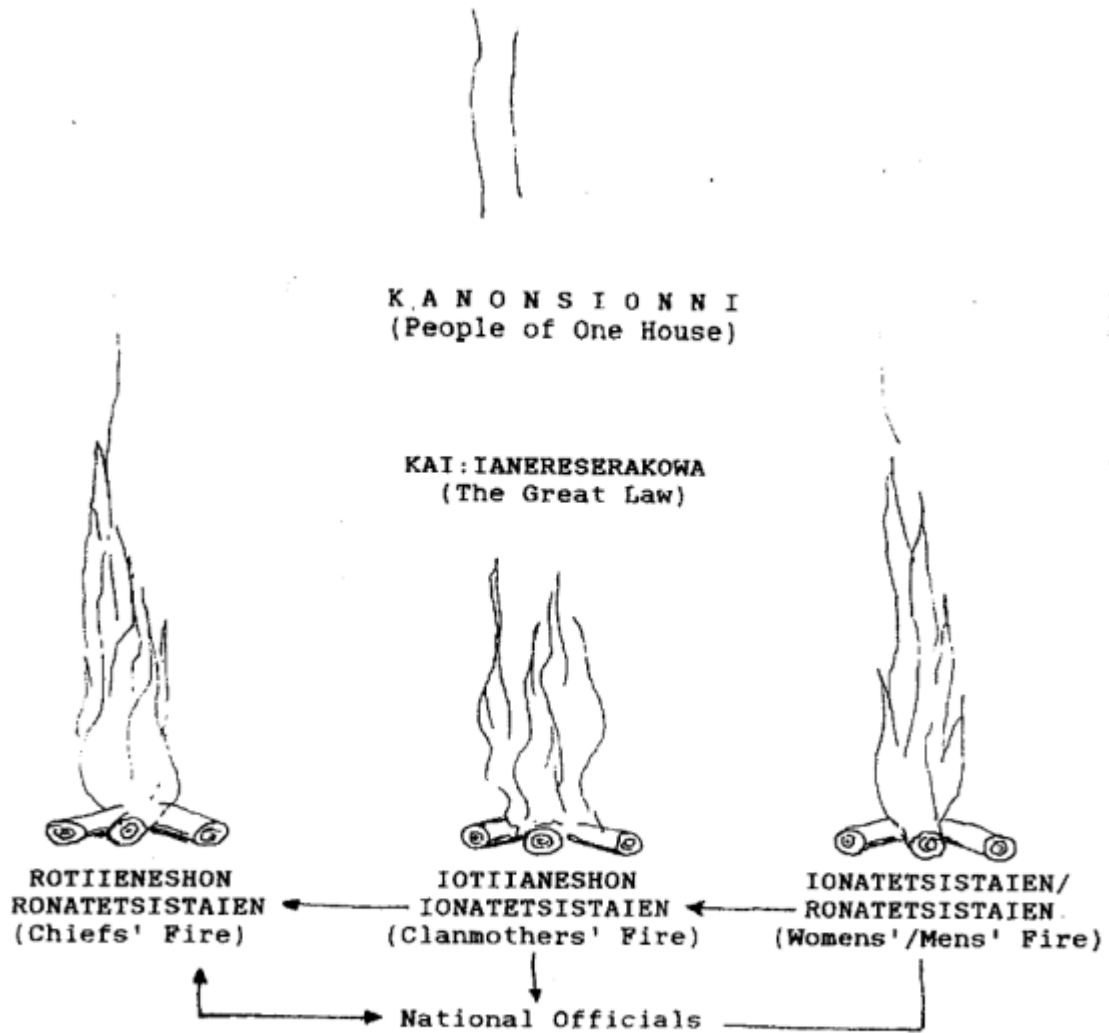
98. If either a nephew or a niece see an irregularity in the performance of the functions of the Great Peace and its laws, in the Confederate Council or in the conferring of Lordship titles in an improper way, through their War Chief they may demand that such actions become subject to correction and that the matter conform to the ways prescribed by the laws of the Great Peace.

EXHIBIT B

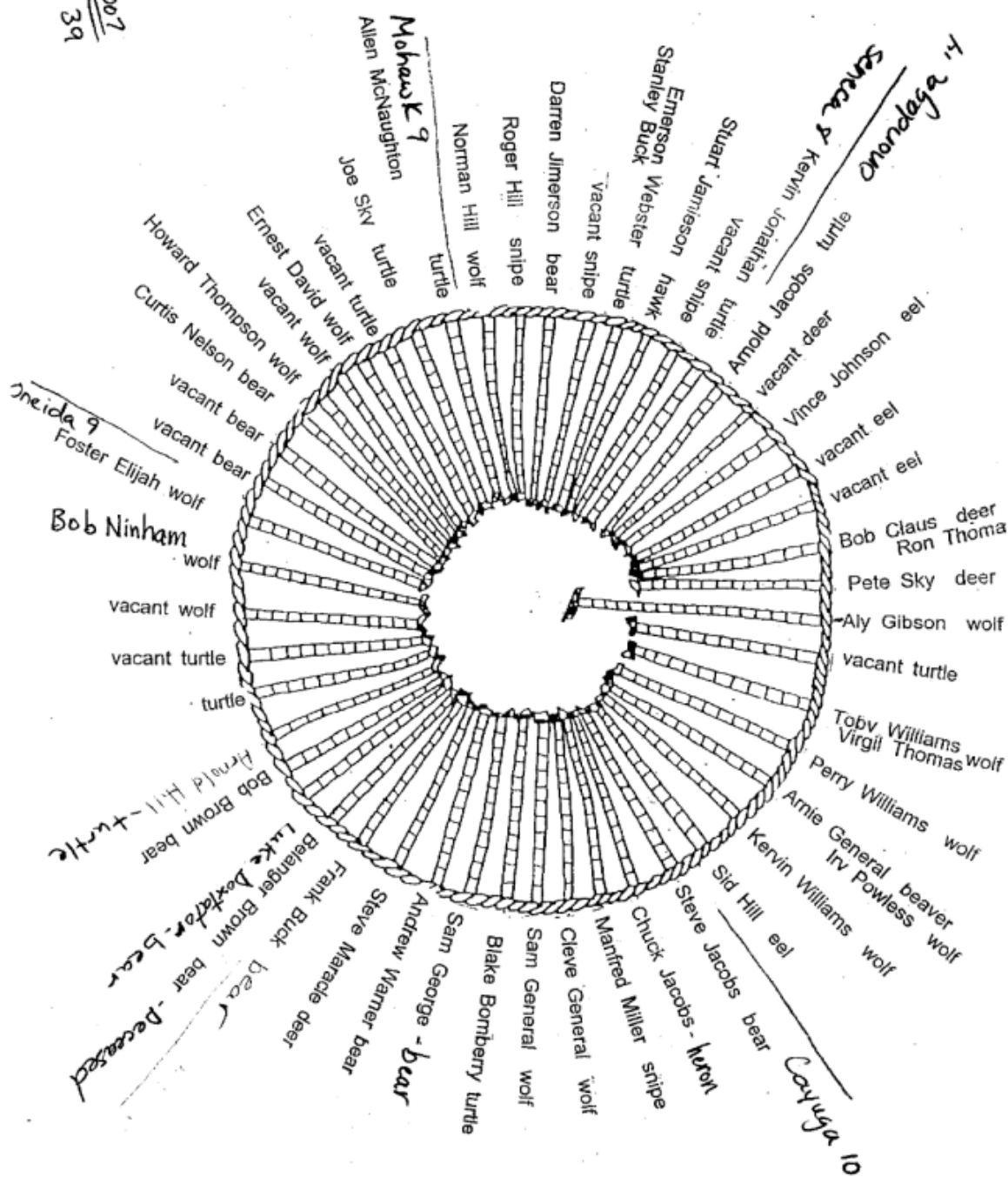
This is Exhibit "B" to the Affidavit of
Paul Delaronde, sworn this 6 day of
January, 2023



Commissioner for Taking Affidavits



2007
39



Grano Council 2004

Mc hawks

So:sgoharowanəh
Ha sdaweserəta
Del tənə'gari:ne'
Aw:əhego:wah
Dy:əhehgoh.
Sa'əhə:na
Tse:degarih Wade'
Hay əhwahta'

De:ɣariho:gə

vacant bear
vacant bear
vacant bear
vacant wolf
vacant wolf
vacant wolf
vacant turtle
Joe Sky turtle
Vernon Vyse turtle
Samson Gabriel turtle
Allen McNaughton turtle

Oneida

Hodatsehdeh
Ganohgwə'yo:doh
Deyoha'gwə:de
Sonohse:s
Hadwənae'gə'ah
Hadya'dəne'ta'
Dehadahohde:yo
Hanya'dasa:ye'
Howatsadəhoh
Foster Elijah wolf
vacant wolf
vacant wolf
vacant turtle
Dalton Duxtator turtle
vacant turtle
Bob Brown bear
vacant bear
Belanger Brown bear

Sene'ca

Dyorinno'ga'we'
Ganohgi'da:wi:
Sadyenawat
Nish'ayənənha
Ga'nogae:'

Norman Hill wolf
Roger Hill snipe
Darren Jimerson bear
vacant snipe
Emerson Webster turtle
Stanley Buck turtle
Stuart Jamieson hawk
vacant snipe
Kervin Jonathan turtle

~~Sage'jo:wa:
Tsa'degaohyes
Sgai'yadae:yo:~~

Cayuga

Haga'eyok
Gaji'nodawehe
Gada:gwa:sə:
Soyq:wi:s
Hagya'drohne'
Dyohyo:goh
Deyotowehgoh
Deyohowe:to:
Hadoda:he:ha'
Desgahe
Frank Buck ~~deer~~ ^{Bear}
Steve Maracle deer
Andrew Warner bear
vacant bear
vacant turtle
Sam General wolf
Cleve General wolf
Manfred Miller snipe
vacant snipe
Steve Jacobs bear

Onondaga

Tadodahoh
Gane'se:he:
Dehatgahdos

Honya'daji:wak
Awe'gəhyat

Dehayatgwae
Honowiyehdi
Gawənešə:doh
Hahi:hoh
Hoyq:nyənih
Sodegwa:sə:
Sagogehe:
Sə:ha:wi:
Sganawadih

Sid Hill eel ✓
Kervin Williams wolf ✓
Arnie General beaver
Irv Powless wolf
Perry Williams wolf
Virgil Thomas wolf
Toby Williams wolf
vacant turtle
Aly Gibson wolf
Pete Sky deer
Bob Claus deer - Ron Thomas (beavermeas)
vacant eel
vacant eel
Vince Johnson eel
vacant deer
Oliver Jacobs turtle - Arnold Jacobs (beavermeas)

Tuscarora

Leo Henry
Stuart Patterson

*igugah Male
Furth Keeper*

Grand River Authorization Map (May 2012)

Seneca

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Bear	Linda Logan	Sadyenawat	Darren Jimerson
Hawk	Janine Huff	Sag, 'jo:wa:	Stuart Jaimeson
Snipe	Janet Hill	Ganohgi'da:wi:	Roger Hill
Snipe	-Vacant-	Nishayene<nha	-Vacant-
Snipe	-Vacant-	Tsa'degaohyes	-Vacant-
Turtle	Grace Buck	Ga'nogac:	-Vacant-
Turtle	Darlene Jonathan	Sganyadae:yo:	Kervin Jonathan
Wolf	Evelyn Jonathan	Dyoninho'ga'we'	Kenny Jonathan

Registrar: Sue Jacobs, Linda Froman

Domain: All Seneca Citizens on Grand River Enrollment

Cayuga

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Bear	Kathy Smoke	Haga'c,yok	-Vacant- (Son - Benchwarmer)
Bear	-Vacant- <i>Co-a. Harris?</i>	Gada:gwa:sc:	Andrew Warner
Bear	Inez Jimerson	Soyo:wi:s	Samuel George
Bear	Carol Jacobs	Desgahe	Steve Jacobs
Deer	Janace Henry	Gaji'nodawehe	Steve Maracle
Heron	Bernadette Hill	Hadoda:he:ha'	William C. Jacobs
Snipe	Mina Keye	Deyohowe:to:	Manfred Miller <i>Roger Silver Smith</i>
Turtle	Julie Bomberry	Hagya;drohne	Blake Bomberry
Wolf	Lori Froman	Deyotowehgoh	Cleveland General
Wolf	-Vacant-	Dyohyo:goh	Samuel General

Registrar: Sue Jacobs, Linda Froman

Domain: All Cayuga Citizens on Grand River Enrollment

Tuscarora

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Beaver			-Vacant-
All Clans			Leo Henry

Registrar: Sue Jacobs, Linda Froman

Domain: All Tuscarora Citizens on Grand River Enrollment

Onondaga

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Beaver	Crystal Laforme	Dehatgahdos	Arnold General
Deer	-Vacant-	Se,:ha:wi:	-Vacant-
Deer	Gloria Thomas	Hahi:hoh	Butch Clause
Deer	Jayne Burning	Gawe,ne,se,:doh	Peter Sky Mike Powless
Eel	Karen Webster	Sagoge,he:	Vince Johnson
Eel	Virginia Abrams	Sodegwa:se,:	-Vacant-
Eel	Francine Bush	Hoyo:ny,nih	Jake Edwards
Eel	NA	Tadodahoh	Sidney Hill
Turtle	Eileen Jacobs	Sganawadih	Arnold Jacobs
Turtle	-Vacant-	Dehayatgwae	-Vacant-
Wolf	Rose Doctor	Honowiyehdi	Alson Gibson
Wolf	Lucille Jamieson	Awe'ge,hyat	Andrew Williams (Toby)
Wolf	Ruby Williams	Honya'daji:wak	Perry Williams (Yogi)
Wolf	Sharon Williams	Gane'se:he:	Kervin Williams

Registrar: Sue Jacobs, Linda Froman

Domain: All Onondaga Citizens on Grand River Enrollment

Oncida

Approver:

Clan	Clan Mother	Chief Title	Chief (English Name)
Bear	Edna Doxtator	Atahu?ta:y	Robert Brown
Bear	Andrea Chrisjohn	Lanyatashat	Luke Doxtator
Bear	Mary Sandy	Owatsa?t tha	-Vacant-
Turtle	Marlene Green	Shonuhses	Alfred Day

Turtle	Marla Summers	Thanahak tha	Robert Antone (Benchwarmer)
Turtle	Deanna Chrisjohn	Atya?tan tha	Arnold Hill
Wolf	Beatrice Nicholas	Otatshehte	Howard Elijah
Wolf	Joanne Summers	Kanukwe?nyo:tu	Robert Ninham Sr.
Wolf	Dawn Chrisjohn	Teyohakw t	-Vacant-

Registrar: Sue Jacobs, Linda Froman

Domain: All Oneida Citizens on Grand River Enrollment

Mohawk

Approver:

Bear	Clan Mother	Chief Title	Chief (English Name)
Bear	Louise McDonald-Herne	Dehharagereneh	Curtis Nelson
Bear	-Vacant-	Rastawehserondah	-Vacant-
Bear	-Vacant-	Sosskoharowaneh	-Vacant-
Turtle	Shirley Hill	Ayonwatha	Joe Skye
Turtle	-Vacant-	Tehkarihoken	Allen MacNaughton
Turtle	-Vacant-	Sadekariwadeh	-Vacant-
Wolf	Angela Elijah	Sahrehowaneh	Ernest David
Wolf	Kawisenhawe Thompson	Orenrehgowah	Howard Thomson
Wolf	-Vacant-	Deyonhehgiveh	-Vacant-

Registrar: Sue Jacobs, Linda Froman

Domain: All Mohawk Citizens on Grand River Enrollment

Nebraska 1865 N.

- Turtle { Dekarikhokah
- { Ayovivthak
- { Shadaxivadeh
- wolf ? { Staraphovneh
- wolf { - Doyovhgeveh
- { - Orenagovah
- Bear { Debermahineh
- { Lastawnaeronthak
- { Shokovovneh

ONEIDA 9

- WOLF { Odatadeh 10
- { Kanongviniyah 11
- { Doyohavvete 12
- TURTLE { Shonovese 13
- { Dehamvete 14
- { Aiyavovvete 15
- BEAR { Adahovvete 16
- { Pavyvshayov 17
- Ronwatshadonhah 18

Madaxbook

- Wolf - Avamisera
- Brown Bear - Dehtkadone
- Wolf - Yadvivakah
- Aveterya
- Dehavygvareh
- Wolf Onowireh (-tamh)
- Bear - Ovensiseronni

MOHAWK 9

Charles 1917 On.

- 1 Dega' lbo'gen' - Allen ManNaughton
- 2 Deyov' ven' lba' - Joe Skye - *deceased Marjorie Skye*
- 3 Sha'dega' luvv' de' - Harold Hill - *Elmer Green*
- 4 Shoenbo' na' - Emerson Hill - *Elmer Murack*
- 5 Deyov' be' gvl' - Tom Elliot - Susan Douglas
- 6 Ooba' go' na' - Jim Gwynne
- 7 Deberma' ga' i' ne'
- 8 Na' otaven' een' cha' - Joe Logan - *Hellie Smick*
- 9 Shogova' inah

- Ho'datche' de'
- Ganen' gven' yo' don'
- Deyo' be' gvan' de'

- Shonov' ese
- De' na' ege' a'
- Hadya' donnen' tha'

- Dovada' bon' den' yook
- Ganyn' deche' yan'

Honwatca' don' hwi' *Ed Jamison - Hazel H. Hill (nee)*

ONONDAGA 14

- 19 Dehadov' de' - *Sharon*
- 20 On' ad' hae' - Kevin Williams - *Grace (Dad)*
- 21 Dehat' ge' de' - Arnold General - *John Yellow*
- 22 Eoye' dadi' bak' - Penny Williams - *Maggie Gree*
- 23 Ave' gen' lyet - Toby Williams - *Ruby W. Violet Thomas*
- 24 Dehaya' tye' o' - Sam Green - *Daisy*
- 25 Eonovio' e' - Mary Henback - *Luey Porter*
- 26 Govenes' shov' dok' - Pat Skye - *Abbie Smick*
Barnice Johnson

Deer - Apirbooh	27	Ma'at'bon' - Butch Clause - ^{Gloria Thomas} Thosy Thomas
Eel - Goveyonyamih	28	Kayonye'air - Coleman Powless - Mrs. Powless
(The) Godegwech	29	Khodegn'oon' -
Eel - Sakotash	30	O'hogogen'ke' - Jack Kirk
Se a vi	31	Ke'ad'ha'vi' -
Turtle - Shamaadi	32	Aganwe'ki' - Oliver Jacobs - Elsie Jacobs
CAYUGA 10		
Bear - Delatrough 33	33	^{FRANK BUCK} Dega'en'yon' - Lincoln Buck - Katherine Buck
Red Deer - Teicondaveron 34	34	Gedji'nondeve'be' - ^{Alta Hill - Isabel Marwick} ^{STAVE NICKLE - JANICE HENRY}
Bear - Kadagvareonh 35	35	Godegn'aji' - Andrew Warner Jr - Cora Davis
Boyovee 36	36	Shayon'vee -
Turtle - Vetyasagooch 37	37	Kadya'sen'ne' - Roy Fish - Margaret Bambrny (Mrs)
Wolf - Dayohronyook 38	38	Dayoen'bron'go' - Edgar Martin - Norma Gurnell
Wolf - Dayothorahyven 39	39	Daryot'hove'evi' - Cleveland General - ^{Erwina Harland} ^{FRANCES FISMAN}
Snipe - Dvovkathon 40	40	Diyaven'het'bon' - Jake Thomas - ^{Ida Skye} ^{MARTRID MILLER - MIRA KEY}
Wolf - Vatomaherba 41	41	Kadonia'be'ha' -
Bear - Des ka e 42	42	Dege'ba' - Harvey Longbrat - ^{Essie Bambrny} ^{Steve Jacobs - Circie Jacobs}
SENECA 5		
Turtle - Shayudariyok	43	Khagudat'lyo' - Sandy Jamieson - Rita Williams
KILL DEER - SHAMPE Shalebrayee	44	Sha'geyan'lyee -
HAWK - Shakerjohvach	45	Shagen'ajo'vach' -
Turtle? - Kanohach	46	Ge'no'ni' - Stanley Buck - Harnal Buck
Snipe - Doshayemah	47	Sh'e'hayge'men't - Adam Burning
BEAR - Shodyanvach	48	Shody'mvat -
KILL DEER - Kanoharikhavich	49	Gaan'gol'de'vi' - JOHNSON SANDY
WOLF - Shoyukishabbharovach	50	Dayomin'hoge'vee' -

FIG. 3.—Front of the Condence case. The roll call of the Founders of the League.

SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS
Plaintiff

-and-

THE ATTORNEY GENERAL OF CANADA *et al.*
Defendants

Court File No. CV-18-594281

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
TORONTO

AFFIDAVIT OF PAUL DELARONDE

JEFFREY KAUFMAN LAW

Professional Corporation

15 Prince Arthur Ave., Suite 200

Toronto, ON M5R 1B2

Jeffrey Kaufman (LSO #21717N)

Tel: 416-400-4158

Fax: 416-964-6662

Lawyers for the Moving Party, the Men's Fire of the Six
Nations Grand River Territory

TAB 4

Court File No. CV-18-594281

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS

Plaintiff

and

**THE ATTORNEY GENERAL OF CANADA and HER MAJESTY THE QUEEN IN RIGHT OF
 ONTARIO**

Defendants

-and-

**THE HAUDENOSAUNEE THE HAUDENOSAUNEE DEVELOPMENT INSTITUTE (AARON
 DETLOR AND BRIAN DOOLITTLE), AS APPOINTED BY THE HAUDENOSAUNEE
 CONFEDERACY CHIEFS COUNCIL, ON BEHALF OF THE HAUDENOSAUNEE
 CONFEDERACY**

Moving Party

ACKNOWLEDGMENT OF EXPERT'S DUTY

1. My name is Paul Delaronde. I live at *Kahnawake*, in the *province of Quebec*.
2. I have been engaged by or on behalf of the Men's Fire of the Six Nations Grand River Territory, an intervenor in these proceedings, to provide evidence in relation to the above-noted court proceeding.
3. I acknowledge that it is my duty to provide evidence in relation to this proceeding as follows:
4. to provide opinion evidence that is fair, objective and non-partisan;
5. to provide opinion evidence that is related only to matters that are within my area of expertise;
and
6. to provide such additional assistance as the court may reasonably require, to determine a matter in issue.
7. I acknowledge that the duty referred to above prevails over any obligation which I may owe to any party by whom or on whose behalf I am engaged.

Date January 6, 2023

A handwritten signature in cursive script, appearing to read "Paul Debra".

Signature

SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS
Plaintiff

-and-

THE ATTORNEY GENERAL OF CANADA *et al.*
Defendants

Court File No. CV-18-594281

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
TORONTO

AFFIDAVIT OF PAUL DELARONDE

JEFFREY KAUFMAN LAW

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Jeffrey Kaufman (LSO #21717N)

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Fax: 416-964-6662

Lawyers for the Moving Party, the Men's Fire of the Six
Nations Grand River Territory

SIX NATIONS OF THE GRAND RIVER BAND OF INDIANS
Plaintiff

-and-

THE ATTORNEY GENERAL OF CANADA *et al.*
Defendants

Court File No. CV-18-594281

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
TORONTO

**RESPONDING MOTION RECORD OF THE
MEN'S FIRE OF THE SIX NATIONS
GRAND RIVER TERRITORY**

JEFFREY KAUFMAN LAW

Professional Corporation

15 Prince Arthur Ave., Suite 200

Toronto, ON M5R 1B2

Jeffrey Kaufman (LSO #21717N)

Tel: 416-400-4158

Fax: 416-964-6662

Lawyers for the Moving Party, the Men's Fire of the Six
Nations Grand River Territory