

**THE DEAD SLEEP QUIET:
HISTORY OF THE ORGANIZED PSEUDOLEGAL
COMMERCIAL ARGUMENT PHENOMENON IN CANADA – PART II**

DONALD J. NETOLITZKY*

A US-sourced set of false law concepts, “pseudolaw,” entered into Canada circa 2000. A localized version of pseudolaw was adopted by two ideologically distinct Canadian populations: (1) Detaxers, and (2) Freeman-on-the-Land.

This article investigates the fate of these “first-wave” pseudolaw phenomena, and their direct descendants. Each remain largely dead and inactive, despite near ideal conditions for a resurgence. This pattern is unexpected, since pseudolaw thrives and expands in stress situations.

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I. INTRODUCTION

Pseudolaw is a collection of concepts that sound like law, and often include legal language,¹ but that are false and rejected by courts worldwide.² Pseudolaw is a product that is marketed to gullible and conspiratorial individuals, who are promised allegedly superior pseudolaw will replace or displace “conventional” law, granting marginal and dissident populations and individuals extraordinary authority and other benefits.³

* Donald J Netolitzky, PhD Microbiology, University of Alberta, 1995; LLB, University of Alberta, 2005; LLM, University of Alberta, 2020; KC, Alberta, 2022, is the Complex Litigant Management Counsel for the Alberta Court of King’s Bench. The views expressed in this article are those of the author, and not those of any other member of the Court of King’s Bench, or the Court itself.

¹ Colin McRoberts, “Tinfoil Hats and Powdered Wigs: Thoughts on Pseudolaw” (2019) 58:3 Washburn LJ 637 at 637–44; Donald J Netolitzky, “Lawyers and Court Representation of Organized Pseudolegal Commercial Argument [OPCA] Litigants in Canada” (2018) 51:2 UBC L Rev 419 at 420–21 [Netolitzky, “Lawyers”]; Donald J Netolitzky, “A Revolting Itch: Pseudolaw as a Social Adjuvant” (2021) 22:2 Politics, Religion & Ideology 164 at 164–70 [Netolitzky, “Itch”].

² McRoberts, *ibid*; Caesar Kalinowski IV, “A Legal Response to the Sovereign Citizen Movement” (2019) 80:2 Mont L Rev 153; Donald J Netolitzky, “After the Hammer: Six Years of *Meads v. Meads*” (2019) 56:4 Alta L Rev 1167 [Netolitzky, “Hammer”].

³ Netolitzky, “Itch,” *supra* note 1.

A localized Canada-specific version of pseudolaw that targeted income tax obligations was emerging in Canada toward the end of the 20th century,⁴ but, post-2000, this domestic strain of pseudolaw was all but entirely displaced by United States concepts that had incubated in US Sovereign Citizen communities for decades.⁵ This propagation and expansion of US false-law concepts was a global process. US-derived pseudolaw spread worldwide into many countries throughout the Commonwealth, and also certain civil law jurisdictions.⁶ In some cases, pseudolaw hybridized with local pre-existing dissident not-law traditions (for example, Germany and Austria, with the Reichsbürgers),⁷ but in most cases, like Canada, local variants were simply swept away and largely disappeared.

The result is a surprisingly consistent international monoculture of alternative law, based around six core concepts:

1. government authority is defective or limited;
2. everything is a contract;
3. silence means agreement;
4. all legal action requires an injured party;
5. the “Strawman” duality; and
6. monetary and banking conspiracy theories.⁸

This shared conceptual backbone means pseudolaw worldwide is remarkably similar, regardless of nation- or community-specific surface trappings, diverse conspiratorial narratives, and the often differing objectives of individual groups.⁹ Furthermore, the various national and community emanations and products of pseudolaw — YouTube videos, how-to guides, template documents — have gradually accumulated in a common informational

⁴ Donald J Netolitzky, “The History of the Organized Pseudolegal Commercial Argument Phenomenon in Canada” (2016) 53:3 *Alta L Rev* 609 at 613–16 [Netolitzky, “History #1”].

⁵ Reviewed in Christine M Sarteschi, *Sovereign Citizens: A Psychological and Criminological Analysis*, (Cham: Springer, 2020) at 1–6 [Sarteschi, *Sovereign Citizens*]. At this point, a detailed understanding of the antecedents to US pseudolaw is probably out of reach. JM Berger, *Without Prejudice: What Sovereign Citizens Believe* (Washington: George Washington University Program on Extremism, 2016), observes at 7, 13 that investigation of the pre-Internet precursors of the modern Sovereign Citizen movement leads to “an incomplete [record] contained in ephemeral small-press publications and pamphlets.” Francis X Sullivan, “The ‘Usurping Octopus of Jurisdictional/ Authority’: The Legal Theories of the Sovereign Citizen Movement” (1999) 1999:4 *Wis L Rev* 785 at 818 stresses the small-scale and informal character of these publications.

⁶ Donald J Netolitzky, “A Pathogen Astride the Minds of Men: The Epidemiological History of Pseudolaw” (Paper delivered at the Centre d’expertise et de formation sur les intégrismes religieux et la radicalisation (CEFIR) Symposium: “Sovereign Citizens in Canada,” 3 May 2018) [unpublished], online: <www.researchgate.net/publication/325053635_A_Pathogen_Astride_the_Minds_of_Men_The_Epidemiological_History_of_Pseudolaw> [Netolitzky, “Pathogen”]; Christine M Sarteschi, “Growing Threat of Sovereign Citizen Extremism Spans Borders and Ideologies” (19 April 2022), online: *Homeland Security Today* <www.hstoday.us/featured/perspective-growing-threat-of-sovereign-citizen-extremism-spans-borders-and-ideologies/> [Sarteschi, “Growing”].

⁷ Netolitzky, “Pathogen,” *ibid* at 14–15.

⁸ Netolitzky, “Itch,” *supra* note 1 at 168–70.

⁹ *Ibid* at 186.

locus: the “cultic milieu.”¹⁰ Their common ultimate origin means pseudolaw materials from different locations and cultures are often interchangeable, or, at most, represent schematically compatible branches off the same conceptual rabbit hole.

A simple but accurate description for the cultic milieu is the collective garbage heap of concepts and information rejected and discarded by mainstream communities. The cultic milieu contains everything from UFO contact and abduction narratives, Templar and Masonic conspiracies, folklore and superstitions, racist ideologies, crank and quack medical claims, obsolete political and philosophical beliefs, rejected scientific theories, and all manner of religious, occult, and cultist dogma.¹¹ Cultic milieu concepts and motifs have become surprisingly commonplace in popular fiction, like “The X-Files,” and are propagated in mainstream media by dubious information sources, such as the so-called “History Channel.” Persons who embrace conspiratorial and unusual resister belief systems frequently rely on the cultic milieu as a reliable information library, which means pseudolaw has now been introduced to many via this mode of transmission.¹²

Put another way, pseudolaw has become a separate and international schema of law. Pseudolaw is predictably the “real law” that will be accessed and adopted by those who subscribe to “improvisational millennialist” conspiracies: an overarching perspective that practically any world event, or political or cultural development, is directed by an essentially unknowable and omnipresent “New World Order” dark design.¹³ That development has multiple implications. First, modern Sovereign Citizen-derived pseudolaw is very likely here to stay, and will not plausibly disappear, no matter how often pseudolaw fails in practice, or is systematically dismantled by courts. Pseudolaw exists in an informational “safe harbour,” outside normal critical and analytical processes.¹⁴

A second consequence is that pseudolaw has ceased to be a memetic virus transmitted from population to population, but now exists in a form that may be encountered and adopted by any individual with Internet access, who hates or fears state and institutional authorities (or their imaginary upstream puppet masters), and who seeks a rules-based and law-styled method to level the (perceived) playing field to their advantage.¹⁵

¹⁰ *Ibid* at 185–86.

¹¹ Colin Campbell, “The Cult, the Cultic Milieu and Secularization” in Michael Hill, ed, *A Sociological Yearbook of Religion in Britain*, 5th ed (London, UK: SCM Press, 1972) 119. “Occulture” (Christopher Partridge, *The Re-Enchantment of the West: Alternative Spiritualities, Sacralization, Popular Culture, and Occulture*, vol 1 (London, UK: T&T Clark International, 2004) at 62–86) and “stigmatized knowledge” (Michael Barkun, *A Culture of Conspiracy: Apocalyptic Visions in Contemporary America*, 2nd ed (Berkeley: University of California Press, 2013) at 26–38) are alternative names for this collection of information.

¹² Netolitzky, “Itch,” *supra* note 1 at 185–86.

¹³ Barkun, *supra* note 11.

¹⁴ Netolitzky, “Itch,” *supra* note 1 at 185–86.

¹⁵ *Ibid* at 186–88.

This article and its companion¹⁶ follow up and expand the record of the Canadian pseudolaw phenomenon reported in 2016 by Netolitzky, “History #1,”¹⁷ to extend the documented timeline of Canadian pseudolaw, investigate, and report:

1. the post-2015 status and fate of earlier Canadian pseudolaw populations and leaders;
2. new Canadian pseudolaw groups and populations that have emerged; and
3. how Canadian pseudolaw has (or has not) evolved, and what, if any, novel pseudolaw concepts have appeared.

This inquiry takes place within an unbalanced, fragmented, and uncertain social landscape. Leading extremist belief sociologist Stephen Kent in 2015 observed that interest in pseudolaw ebbs and flows, pointing to how attraction to pseudolaw, and employment of these ideas, has coincided with events such as the 1980s US farm crisis, mortgage and financial institution disruptions circa 2010, and other instances where atypical social and economic conditions subverted confidence in government and institutional actors.¹⁸

Kent’s model appears correct. Canadian pseudolaw activity has undergone two recent expansions:

- (1) during the 2018-2019 economic downturn that triggered activist and protester responses, generally grouped within the “Yellow Vest” phenomenon; and
- (2) in response to the ongoing COVID-19 pandemic, and negative reactions to government disease management and mitigation steps, and vaccination programs.

What has occurred in Canada is, in certain ways, quite distinct from developments in other jurisdictions where pseudolaw’s expansion took different, and more extreme, paths. This article’s companion concludes with an overview of that pattern, and possible reason(s) why the way pseudolaw manifests and is used in Canada is different.

II. BACKGROUND AND TERMINOLOGY

A. OVERVIEW OF PSEUDOLAW CONCEPTS AND COMMUNITIES

The first detailed collection and systematic review of pseudolaw concepts in any jurisdiction was the 2012 *Meads v. Meads*¹⁹ decision of Associate Chief Justice Rooke of the

¹⁶ Donald J Netolitzky, “New Hosts for an Old Disease: History of the Organized Pseudolegal Commercial Argument Phenomenon in Canada – Part III” 60:4 *Alta L Rev* [forthcoming in 2023] [Netolitzky, “History #3”].

¹⁷ Netolitzky, “History #1,” *supra* note 4.

¹⁸ Stephen A Kent, “Freemen, Sovereign Citizens, and the Challenge to Public Order in British Heritage Countries” (2015) 6 *Intl J Cult Studies* 1. See also Edwin Hodge, “The Sovereign Ascendant: Financial Collapse, Status Anxiety, and the Rebirth of the Sovereign Citizen Movement” (2019) 4 *Frontiers in Sociology* 1. A further example is pseudolaw’s expansion in the Republic of Ireland following the 2010 property bubble: Netolitzky, “Pathogen,” *supra* note 6 at 10–12.

¹⁹ *Meads v Meads*, 2012 ABQB 571 [*Meads*].

Alberta Court of King's Bench. That broadly referenced, disseminated, and surprisingly popular decision²⁰ grouped together and organized known Canadian pseudolaw concepts as "Organized Pseudolegal Commercial Arguments" (OPCA). The global monoculture of pseudolaw theories and comparatively limited post-2012 evolution of pseudolaw means *Meads* remains highly relevant.²¹

1. NOMENCLATURE

To date, the "OPCA" and "pseudolaw" terms are less used in reporting, discussion, and analysis to identify pseudolaw beliefs and communities. Instead, pseudolaw phenomena are usually clumped under the "Sovereign Citizen" or "SovCit" labels. That nomenclature is very unfortunate for several reasons.

First, the Sovereign Citizen movement is a US phenomenon that is politically and culturally distinct from many other pseudolaw host populations.²² Modern pseudolaw developed in, and emerged from, the US Sovereign Citizen community, but pseudolaw subsequently infected and colonized radically different populations with a diverse range of objectives.²³

Sovereign Citizens are super-nationalists who seek to reform and restore a US that lost its way, using (pseudo)law as the mechanism to cause legal and political reform, and legitimize revolutionary and reactionary activity.²⁴ In contrast, Canadian Freemen-on-the-Land were a social parasite and criminal population who sought a life of "do as I please," and "take what I want." The potential scope, activity, and social impact of these two groups is very different.²⁵ Despite that, Freemen are often conflated as "Sovereign Citizens." That badly misrepresents the former group's probable behaviour, risk, and threat characteristics.²⁶

Second, the phrase "Sovereign Citizen" is a quite functional way to express the philosophical underpinnings of that particular population: (1) "citizens" of a *state* of the US, rather than the US itself; and (2) "sovereign," in the sense that Sovereign Citizens perceive state authority as "second-hand," and to only exist as delegated by "We the People." The Canadian Freemen, on the other hand, recognize no valid government authority, and are "citizens" of nothing. The German Reichsbürgers are another contrasting example. Reichsbürgers are not "sovereign," but, instead, claim to be "citizens" of a precursor of the German Federal Republic. So Reichsbürgers say they are Germans, but of a different kind.

Table 1 further illustrates this point, and provides an overview of the diversity of populations and groups that have and currently employ pseudolaw, worldwide.

²⁰ Netolitzky, "Hammer," *supra* note 2 at 1186–201.

²¹ *Ibid* at 1182–86; Netolitzky, "Itch," *supra* note 1 at 170.

²² Netolitzky, "Itch," *ibid* at 165–66.

²³ *Ibid* at 171–78; Daniel Baldino, "The International Blueprint for Anti-Government Extremism and the Rise of Sovereign Citizen Movements" (18 February 2022), online (blog): *Australian Outlook* <www.internationalaffairs.org.au/australianoutlook/the-international-blueprint-for-anti-government-extremism-and-the-rise-of-the-sovereign-citizen-movements/>.

²⁴ Netolitzky, "Itch," *ibid* at 172.

²⁵ *Ibid* at 180–83, 188.

²⁶ *Ibid* at 165, 188.

TABLE 1:
PSEUDOLAW GROUPS AND MOVEMENTS WORLDWIDE²⁷

Name	Nation	Political and Social Orientation	Racial Orientation	Additional Key Characteristics	Status
Sovereign Citizen	US	Right-wing, nationalist, Libertarian, Christian traditionalists	Originally white racist, now more diverse	Aligned with US conspiratorial interests, Q-Anon, right-wing political factions	Active, probably expanding
Militias	US	Firearms ownership, anti-Federal, pro-state authority	Usually irrelevant	Some lack pseudolaw aspects	Active, probably expanding
Moors	US	Race-based identity	Black supremacist / separatist, Islamic or Indian trappings	Criminal, gang-affiliated	Active, probably expanding
Tax Protestors	US	Libertarian tendencies, otherwise apolitical	Irrelevant	Promoted and organized as a business	Dead or marginal
One People's Public Trust	US, Canada, and Austria	Left-wing, New Age, mystical	Egalitarian	Highly ceremonial, spiritual, irrational	Dead or marginal
Detaxers	Canada	Libertarian tendencies, otherwise apolitical	Some anti-Semitic banker conspiracy beliefs	Promoted and organized as a business	Dead

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Sources for this summary include: Netolitzky, "Pathogen," *supra* note 6; Netolitzky, "History #1," *supra* note 4; Netolitzky, "Lawyers," *supra* note 1; Netolitzky, "Hammer," *supra* note 2; Sarteschi, *Sovereign Citizens*, *supra* note 5; Sarteschi, "Growing," *supra* note 6; Spencer Dew, *The Aliites: Race and Law in the Religions of Noble Drew Ali* (Chicago: University of Chicago Press, 2019); Susan Palmer, *The Nuwaubian Nation: Black Spirituality and State Control* (Burlington: Ashgate, 2010); Kaitlyn Compari, "The Moorish Science Temple of America and the Legal System: Exploring the Need to Take Proactive Measures Against Radical Members of an Incorporated Religion" (2014) 15:3 *Rutgers JL & Religion* 507; Samuel Barrows, "Sovereigns, Freemen, and Desperate Souls: Towards a Rigorous Understanding of Pseudolaw Tactics in United States Courts" (2021) 62:3 *Boston College L Rev* 905; Karoline Marko, "'The Rulebook – Our Constitution': A Study of the 'Austrian Commonwealth's' Language Use and the Creation of Identity Through Ideological In- and Out-Group Presentation and Legitimation" (2021) 18:5 *Critical Discourse Studies* 565; Johannes Sinabell, "Freeman, Souverän und Staatsverweigerer" (2018), online: *ARGE Weltanschauungen* <www.weltanschauungenfragen.at/lexikon/freeman-souveraen-und-staatsverweigerer>; Florian Buchmayr, "Denying the Geopolitical Reality: The Case of the German 'Reich Citizens,'" in Andreas Önnersfors & André Krouwel, eds, *Europe: Continent of Conspiracies: Conspiracy Theories in and About Europe* (Abingdon: Routledge, 2021) 97; Rob Sudy, "FREEMAN DELUSION: The Organised Pseudolegal Commercial Argument in Australia," online: <freemandelusion.com>; Sylvain Duchamp, "Le mouvement complotiste et antisystème One Nation sur le point d'acquérir un domaine dans le Lot" (28 September 2021), online: *France 3 Occitanie* <france3-regions.francetvinfo.fr/occitanie/lot/cahors/le-mouvement-complotiste-et-antisysteme-one-nation-sur-le-point-d-acquerir-un-domaine-dans-le-lot-2269165.html>; "Accueil," online: <www.one.lab.land>; "Alice Pazalmar" (20 December 2021), online: <www.conspiracywatch.info/alice-pazalmar>; Ilya Zhegulyov, "Thousands of Russians Have Joined Something Called the 'Union SSR' Trade Union, Calling Themselves Soviet Citizens and Refusing to Pay Their Bills" (15 January 2019), online: <meduza.io/en/feature/2019/01/15/thousands-of-russians-have-joined-something-called-the-union-ssr-trade-union-calling-themselves-soviet-citizens-and-refusing-to-pay-their-bills>; Matthew Luxmoore, "Flouting the Law in Nostalgia's Name: Russia's Growing Movement of 'Soviet Citizens'" (25 May 2019), online: *Radio FreeEurope/RadioLiberty* <www.rferl.org/a/flouting-law-in-nostalgia-s-name-russia-s-growing-movement-of-soviet-citizens-/29962523.html>. Interested readers are strongly recommended to investigate these resources and other up-to-date reports on specific pseudolaw movements, and nation-specific pseudolaw populations, to avoid stereotyping the tabulated pseudolaw groups.

Name	Nation	Political and Social Orientation	Racial Orientation	Additional Key Characteristics	Status
Freemen-on-the-Land	Canada	Left-wing, anti-authority reactionaries, anti-corporate, anti-globalization	Egalitarian and anti-racist	Predominately marginal social drop-outs and criminals / drug traffickers	Dead
Irish Freeman	Republic of Ireland	Anti-bank, anti-authority reactionaries	Irrelevant	Anti-debt claims triggered by property bubble	Dead
UK Freeman	UK	Anti-bank, anti-authority reactionaries	Xenophobic, secondarily racist, traditionalist, pro-Brexit	Low-income, “dole” recipient populations, debt-oriented	Active, probably expanding
Australia Pseudolaw Communities	Australia	Politically diverse, Libertarian, anti-authority	Diverse, some xenophobic, some Indigenous separatist	No dominant Australia-specific pseudolaw style, influenced by Canada, US, UK	Active, probably expanding
New Zealand Indigenous Law	New Zealand	Left-wing, Indigenous rights, anti-authority	Indigenous supremacist / separatist	Resembles how Canadian Freemen have criminal aspect	Active but marginal
UBUNTU	South Africa	Socialist, New Age, communal	Egalitarian	Money for nothing, political party	Dead
Reichsbürgers	Germany and Austria	Right-wing, nationalist, traditionalist, reactionary	Xenophobic, anti-immigrant, anti-Islam	Claim previous state / governments are true authority	Active, probably expanding
One Nation	France	Separatist, New Age, mystical	Egalitarian	Pandemic reactionary	Active
NeoSoviets	Russia	Communist, conservative, reactionary	Irrelevant	Claim Soviet government is true authority	Active, probably expanding

Summary of major pseudolaw movements and populations world-wide. The described characteristics are “loose”; many named pseudolaw groups exhibit substantial diversity, and include “satellite groups” that vary from these core traits. Characteristics of some groups, particularly the Sovereign Citizen pseudolaw movement, have also evolved and shifted over time.

The simple solution to this nomenclature issue is to identify people and groups who have inherited and adopted the matrix of US Sovereign Citizen concepts as “pseudolaw groups,” composed of “pseudolaw adherents.”²⁸ That clarifies the difference between host populations, with their particular political, economic, cultural, religious, and criminal objectives, and the “memetic virus” of pseudolaw that has infected these groups and individuals.²⁹

2. PSEUDOLAW’S CORE CONCEPTS

Pseudolaw’s core beliefs are a matrix of conspiracy theories, alternative history, “legal error” deviations from legitimate legal principles, and, for lack of better explanation, magic. For example, all pseudolaw populations have some story or explanation for how government authority is in some manner exaggerated, defective, or simply a dirty trick. US Sovereign Citizens claim that the 14th Amendment, conventionally described as completing the emancipation process, was instead a contractual trap that converted pre-Civil War free

²⁸ Netolitzky, “Itch,” *supra* note 1 at 164–68, 187–88.

²⁹ *Ibid* at 166–71.

citizens of the various US States into “US citizens,” who are indentured servants of the US Federal Government and its institutions.³⁰ That alternative history combines a variation on conventional law with a malevolent conspiracy to steal away peoples’ rights.

Most defective state authority theories are nation-specific. As previously described, Reichsbürgers negate the authority of one German nation state by claiming allegiance to another. One Reichsbürger theory is Germany’s Second World War defeat and surrender is an Allied lie. Only the German Wehrmacht³¹ surrendered; the Nazi Third Reich continues to the present in a slumbering form.³²

Other core pseudolaw motifs are legal rules, just ones that are “legal errors,” and wrong in the conventional common law tradition.³³ “Silence means acceptance or agreement” contradicts an accepted principle of contract that instead requires positive action. “Legal remedy requires an injury” expands a tort principle outside its accepted context. In these instances, US Sovereign Citizen pseudolaw, and its Commonwealth derivatives, use (apparently) legitimate legal sources to support these incorrect claims.³⁴

The strangest core element of pseudolaw is a unique, unprecedented invention: Strawman Theory.³⁵ While there are innumerable variations on Strawman Theory, the core claim is that individuals have two separate but linked aspects:

1. A “flesh-and-blood” human component identified with mixed or lower-case letters, and sometimes with atypical punctuation, for example, “robert-arthur: menard.” The human is only subject to a historical or abridged form of law, usually called “Common Law.” Governments have no innate authority over humans.
2. A non-human immaterial “Strawman” that is identified in all-capital letters, for example, “ROBERT ARTHUR MENARD.” The Strawman is liable to “conventional law” such as legislation, and government and court authority.

According to Strawman Theory, people are born without a Strawman, but apparently innocent birth documentation is purportedly a clandestine contract between government and humans that allows government authority and legislative controls to chain through the Strawman and enslave the human. Getting rid of the Strawman, and the birth documentation contract, renders humans outside government authority and only subject to the “Common Law.”

³⁰ Angela P Harris, “Vultures in Eagles’ Clothing: Conspiracy and Racial Fantasy in Populist Legal Thought” (2005) 10:2 Mich J Race & L 269 at 292–97; Susan P Koniak, “When Law Risks Madness” (1996) 8:1 Cardozo Stud L & Lit 65 at 68, 81–83, 93–97; Sullivan, *supra* note 5 at 792–98, 801–804. Armed forces.

³¹ Buchmayr, *supra* note 27.

³² Donald J Netolitzky, “Organized Pseudolegal Commercial Arguments as Magic and Ceremony” (2018) 55:4 Alta L Rev 1045 at 1049–53 [Netolitzky, “Magic”].

³³ *Ibid.*

³⁴ Reviewed in *Meads*, *supra* note 19 at paras 417–46; Netolitzky, “Magic,” *ibid* at 1069–78.

Strawman Theory is nearly universal in pseudolaw communities, world-wide.³⁶ Strawman Theory has no historical antecedent, so its appeal is peculiar. One proposed explanation for that broad-based appeal is Strawman Theory is an exorcism ceremony with legal trappings.³⁷

3. MANY PSEUDOLAW POPULATIONS HAVE COMPLEX CHARACTERISTICS

Pseudolaw is a set of concepts about what law is and is not, a kind of free-standing legal system.³⁸ In that way, pseudolaw is politically agnostic.³⁹ In the “real world,” pseudolaw operates in combination with pre-existing social communities with marginal, revolutionary, reactionary, criminal, and anti-government objectives, who seek extraordinary authority.⁴⁰ Pseudolaw’s real-world manifestations are a chimera of pseudolaw’s narrative and promised empowerment, and the beliefs of host populations.

That means groups that employ pseudolaw often juxtapose multiple characteristics. For example, Sam Jackson observes Sovereign Citizens combine nativist and anti-government extremism, and overlap with the Patriot/Militia movement.⁴¹ Almost all manifestations of pseudolaw include some kind of conspiratorial narrative, typically how malevolent actors or despotic governments have stolen away and concealed peoples’ true legal rights.⁴²

Pseudolaw groups, particularly those with a right-wing orientation, are often “backwards looking.” Ruth Braunstein⁴³ and Amy B. Cooter⁴⁴ call this “nostalgia,” while Edwin Hodge describes this characteristic as a “counter-memory.”⁴⁵ This perspective makes sense because the narrative of pseudolaw is that the “real law” existed but was then hidden away and suppressed by bad actors. Additionally, in common law jurisdictions, imagining a new and better law is impossible due to common law’s incremental development and veneration of historical and inviolate foundational antecedents.

³⁶ The Strawman motif is essentially universal in Canadian pseudolaw (Netolitzky, “History #1,” *supra* note 4 at 633–34) and in pseudolaw movements outside the US. However, Strawman Theory is sometimes absent in US pseudolaw systems, for example, concepts advanced by Marc Stevens (McRoberts, *supra* note 1 at 641–42, 649). This difference between the US and other nations has to do with how pseudolaw emerged from the US as an integrated “memplex” package (Netolitzky, “Itch,” *supra* note 1; Netolitzky, “Pathogen,” *supra* note 6), and then displaced indigenous pseudolaw traditions. The US harbours a greater diversity of pseudolaw traditions and streams.

³⁷ Netolitzky, “Magic,” *supra* note 33 at 1075–78.

³⁸ Netolitzky, “Itch,” *supra* note 1.

³⁹ *Ibid.*

⁴⁰ *Ibid.*

⁴¹ Sam Jackson, “A Schema of Right-Wing Extremism in the United States” (The Hague: International Centre for Counter-Terrorism, 2019), online: *International Centre for Counter-Terrorism* <icct.nl/app/uploads/2019/11/ASchemaofRWEXSamJackson-1.pdf>.

⁴² Netolitzky, “Itch,” *supra* note 1.

⁴³ Ruth Braunstein, “The ‘Right’ History: Religion, Race, and Nostalgic Stories of Christian America” (2021) 12:2 Religions 95.

⁴⁴ Amy B Cooter, *Americanness, Masculinity, and Whiteness: How Michigan Militia Men Navigate Evolving Social Norms* (PhD Dissertation, University of Michigan, 2013) [unpublished], online: *University of Michigan* <deepblue.lib.umich.edu/bitstream/handle/2027.42/98077/cooterab_1.pdf>; Amy Cooter, “Citizen Militias in the U.S. Are Moving Toward More Violent Extremism” (2022), online: <www.scientificamerican.com/article/citizen-militias-in-the-u-s-are-moving-toward-more-violent-extremism/>.

⁴⁵ Hodge, *supra* note 18 at 5–7.

This “backwards looking” characteristic takes a different form in civil law jurisdictions. Pseudolaw groups, such as the Reichsbürgers and NeoSoviets, affiliate with an “older regime” with desired characteristics, rather than an older idealized law.

A final introductory point is to stress that outside observers, such as lawyers, academics, and media figures, often impose an unwarranted kind of “rationality,” or “regularity,” on pseudolaw populations and their beliefs. This practice distorts the esoteric and exotic character of pseudolaw adherents. External observers often correctly identify pseudolaw as highly conspiratorial, but a more accurate characterization of pseudolaw communities shows this phenomenon is often more complex and far weirder than that.

Experts and academics typically view and describe populations through the lens of their specializations. For example, this article primarily discusses pseudolaw groups as “law-related movements.” That is both correct, and also very misleading. Law-related ideas are a critical, distinctive, and defining aspect of pseudolaw communities, but usually much more is in play. Here a real-world illustration is useful.

On 20 January 2022, a number of pseudolaw personalities broadcasted a video conference on YouTube.⁴⁶ Ostensibly, this event promoted the Anishinabek Solutrean Métis Indigenous Nation (ASMIN),⁴⁷ an Ontario-based pseudolaw group that purports to grant extraordinary “Indigenous” status and immunities by selling membership to a Métis nation. Panel members included suspended Ontario lawyer Glenn Patrick Bogue, and “klanmother” Karen Macdonald. These persons, and ASMIN, are subsequently described in this article and its companion.

Bogue early in this video explains the “legal error” basis for the ASMIN claims that Bogue markets: “Indigenous” and “Indigenous status” means one is born in the geographic region called Canada.⁴⁸ Indigeneity has nothing to do with pre-European contact populations located in the Americas. Bogue then references actual Canadian law and international treaties for various rights. Bogue’s pseudolaw claim can be expressed in a legal context, and rejected on that basis. Saying the ASMIN pseudolaw scheme is “a law thing” is therefore correct. Bogue’s claims rely on legal concepts and jurisprudence, and exist within a structure recognizable as law.

However, much more is going on here. The “law part” of this nearly two-hour video only amounts to the first few minutes of this broadcast. Instead, the participants rapidly shift to topics that most viewers will find bewildering and bizarre. Native status relates to genetics, specifically bloodtype. klanmother Macdonald is one of the few legitimate natives with her AB blood type. So-called “Indians” are extraterrestrials. There is a Stargate near Hope, British Columbia. Earth governments have entered into a treaty that entitles reptilian extraterrestrials to harvest millions of children off planet each year. Justin Trudeau is a reptilian inside a playboy body. The participants debate who is the modern incarnation of “Enki,” a

⁴⁶ True Tube, “‘Parliament Must Now Vacate Ottawa in Favour of NEW Indigenous Government’: Panel” (20 January 2022), online (video): <www.youtube.com/watch?v=I9ASRaFgnPw>.

⁴⁷ Online: ASMIN <askit4equity.com>.

⁴⁸ True Tube, *supra* note 46, at 00h:03m:00s, 00h:07m:30s.

Sumerian god who allegedly created humans by genetic manipulation to mine gold as slave workers. And so much more.⁴⁹

This may seem strange and extraordinary to the reader, but the ASMIN videoconference meeting members obviously all speak a shared language and reference a common mythos. For them, this dialogue is nothing unusual. This is their world. The video's "chat comments" demonstrate many viewers occupy the same zeitgeist.

All this strangeness is established in aspects of the cultic milieu, and is integrated into the improvisational millennialist super-conspiracy narrative.⁵⁰ Many people who are leaders, consumers, and practitioners of pseudolaw exist in a different conceptual space from much of the public.⁵¹ This phenomenon is not restricted to Canada. For example, the US's leading pseudolaw Accept for Value (A4V)⁵² guru, Winston ShROUT, says he sits on a "galactic roundtable" and controls financial institutions with his colleagues: elves, the Queen of the Fairies, and fictional New Age figure "Saint Germain."⁵³

That is not to say that pseudolaw cannot be a coldly rational phenomenon. Anti-tax pseudolaw and its believers (at least sometimes) exhibited a calculating cost/benefit approach to those ideas.⁵⁴ But many, if not most, modern pseudolaw practitioners are also deeply influenced by the cultic milieu and its broader assemblage of atypical and marginal beliefs.

The linkage and incorporation of pseudolaw within the cultic milieu is important for several reasons. First, understanding and responding to pseudolaw is not "just about law." Other factors are often in play. Knowing the broader conspiratorial and mythic belief systems of a population is important to understand why and how that population was infected by pseudolaw, and to predict how the false empowerment promised by pseudolaw will manifest.⁵⁵

Second, normal methods of discussion, debate, and proof may have little to no application in the pseudolaw context. Instead, persons drawn to the cultic milieu establish the reliability of concepts by whether ideas are marginalized, rejected by academic and legal authorities, amateur, and simply incoherent. Improvisational millennialist "truth" is established when that "truth" is suppressed and rejected.⁵⁶

Third, the co-location of pseudolaw and other extraordinary beliefs limits the potential membership and social span of pseudolaw. Bogue and Macdonald are unlikely to recruit many followers outside fringe communities. As they themselves observe, their claims only bring an astonished response from legitimate Indigenous populations. Nevertheless, the recent and increasing proliferation of conspiratorial thought and belief via mass and social

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Ibid.

50

Barkun, *supra* note 11.

51

Netolitzky, "Magic," *supra* note 33 at 1082–84.

52

Meads, *supra* note 19 at paras 531–43.

53

Netolitzky, "Magic," *supra* note 33 at 1082–84; Thomas Argiro, "Tracing Saint Germain: Absolute Knowledge and the Specter of Immortality" (2011) 15:4 J Cultural Research 373.

54

Netolitzky, "Lawyers," *supra* note 1 at 430–34.

55

Netolitzky, "Itch," *supra* note 1.

56

Barkun, *supra* note 11.

media predisposes more people to start *and remain* on a pseudolaw path. That distinction is important. Rational actors may adopt pseudolaw, for example out of greed or desperation, but they will predictably drop pseudolaw when they realize pseudolaw does not work.⁵⁷ What remains are persons whose perspectives are, bluntly, irrational, ideological, and magical.

B. CANADIAN PSEUDOLAW LITIGATION ACTIVITY

Court records and judgments, and academic investigation, demonstrate pseudolaw has been taught and deployed in Canada for decades. Some aspects of Canadian pseudolaw thought and communities are comparatively easy to track, such as who is teaching pseudolaw, and what pseudolaw concepts are involved.⁵⁸ This data is “readily knowable” thanks to the confluence of several factors:

1. People who popularize or sell pseudolaw, “pseudolaw gurus,” must advertise in some manner to attract customers. That almost inevitably involves some kind of public Internet activity.⁵⁹ While gurus may tightly sequester some data “for pay only,” like purported critical secrets or magic template documentation, external investigators can almost always learn much about any given pseudolaw scheme from what is publicly disclosed in recruitment/advertising materials.
2. Pseudolaw gurus highlight their (purportedly) unique knowledge, skills, and how that guru is different from their competitors. Otherwise, gurus blend into the mass of pseudolaw resident in the cultic milieu. That means guru-specific pseudolaw concepts are rarely truly private knowledge.
3. Over the longer term, much previously sequestered pseudolaw information and materials have become public.⁶⁰ For example, once rare and private pseudolaw texts and videos are now available for download from public Internet sources.
4. Historically, pseudolaw communities were networked and social. If anything, that increased once pseudolaw integrated into the cultic milieu. Information about new developments and personalities diffuses through an introspective social space.⁶¹

⁵⁷ Donald J Netolitzky, “Organized Pseudolegal Commercial Arguments [OPCA] in Canada; an Attack on the Legal System” (2016) 10 JPPL 137 at 179–81 [Netolitzky, “Attack”].

⁵⁸ The same factors are usually relevant in evaluating pseudolaw in different jurisdictions, though the degree to which court proceedings and legal filings are accessible is quite different, nation to nation. For example, the US PACER (Public Access to Court Electronic Records, online: <www.pacer.gov>) system provides that jurisdiction complete and comprehensive public access to court proceedings. Access to complete records then permits quantitative investigation of pseudolaw in the US (see e.g. Brian S Slater, *Sovereign Citizen Movement: An Empirical Study on the Rise in Activity, Explanations of Growth, and Policy Prescriptions* (MA Thesis, Naval Postgraduate School, 2016) [unpublished], online: *Naval Postgraduate School* <calhoun.nps.edu/bitstream/handle/10945/50485/16Sep_Slater_Brian.pdf>). This was not originally the case. Prior to 2010, pseudolaw was a highly sequestered activity taught face-to-face within very limited circles. That marketplace strategy was displaced by other, more efficient methods to transmit these ideas: Netolitzky, “Itch,” *supra* note 1 at 183–86.

⁵⁹ Netolitzky, “Itch,” *ibid* at 184–85.

⁶⁰ Netolitzky, “Itch,” *ibid* at 184–85.

⁶¹ Netolitzky, “History #1,” *supra* note 4 at 635–36; Donald J Netolitzky, “Organized Pseudolegal Commercial Arguments in Canadian Inter-Partner Family Law Court Disputes” (2017) 54:4 Alta L Rev 955 at 961–93 [Netolitzky, “Family”].

5. Pseudolaw gets used. Eventually pseudolaw ideas and schemes are employed for their intended purpose: to shift authority from, and exercise power against, government authorities, law enforcement, businesses, and, most importantly, courts. Since courts and their records are public, much pseudolaw eventually becomes accessible to outside investigators via reported court decisions. Additionally, court files that involve pseudolaw will frequently include a complete set of documents used to implement a pseudolaw strategy, and thus disclose the pseudolaw ideas and motifs employed.

The overall result is that truly private pseudolaw schemes are uncommon.⁶² Pseudolaw systems either enter the cultic milieu, and are preserved and become publicly accessible, or effectively disappear entirely and are therefore lost.

Combined, that means that a researcher (academic, legal, government, intelligence, law enforcement, or pseudolaw adherent) who is willing to invest the time to read published data and reported court decisions, access court filings, and travel along often peculiar backroads of the online world, can accumulate a substantial appreciation of:

1. who in Canada has promoted and sold pseudolaw;
2. what pseudolaw concepts and schemes are and have been in circulation; and
3. what Canadian populations have shown interest in and employed pseudolaw.

This article and its companions are products of that type of investigation. While these reports are almost certainly incomplete, the public and accessible character of Canadian pseudolaw activities means this review should capture most of what has occurred post-2015, and fills in certain gaps in the Netolitzky, “History #1” article.⁶³

However, there is a second, separate issue. Attempts to measure and quantify Canadian pseudolaw activity are problematic. For example, many media, legal, and academic sources indicate the Canadian “Freeman” movement has (or had) about 30,000 adherents.⁶⁴ After

⁶² The only well-documented Canadian example is the United Sovran Nations / Tacit Supreme in Law Courts group that operated circa 2011–2013: see Part III.D.8 below; Netolitzky, “History #1,” *ibid* at 628–29. This group maintained a high degree of “operational security,” then largely erased its online activities, and retrieved whatever records had been seized by authorities.

⁶³ See also Netolitzky, “Hammer,” *supra* note 2.

⁶⁴ See e.g. Mack Lamoureux & Wallis Snowdon, “‘Paper Terrorism’ Case Leads to Charge Against Freeman on the Land Member,” *CBC News* (21 September 2016), online: <www.cbc.ca/news/canada/edmonton/paper-terrorism-case-leads-to-charge-against-freeman-on-the-land-member-1.3772454>; The Canadian Press, “Freemen Movement Concerns Canadian Legal Communities,” *CBC News* (2 September 2013), online: <www.cbc.ca/news/canada/british-columbia/freemen-movement-concerns-canadian-legal-communities-1.1345486>; The National, “Finding the Freeman” (2012), online (video): *CBC* <curio.ca/en/video/finding-the-freemen-1439/>; Dene Moore, “Justice Officials Warn of Freeman Movement,” *Global News* (2 September 2013), online: <globalnews.ca/news/814829/justice-officials-warn-of-freeman-movement/>; Hodge, *supra* note 18; Canadian Security Intelligence Service, “Intelligence Assessment: 2012 Domestic Threat Environment in Canada (Part I): Left-Wing / Right-Wing Extremism” (23 March 2012), online: <issuu.com/openbriefing/docs/domestic-threat-environment-in-canada>; Dave Bilinsky, “The Freeman-on-the-Land Movement” (2012) 4 *Benchers’ Bulletin* 11; David Neiwert, “Canadian ‘Freeman’ Leader Arrested After Skipping Hearings” (13 December 2013), online: *Southern Poverty Law Center* <www.splcenter.org/hatewatch/2013/12/13/canadian-‘freeman’-leader-arrested-after-skipping-hearings/>.

exhaustive investigation, the author has concluded this figure has no basis in fact.⁶⁵ Its source is unknown, but the best identified explanation is that the 30,000 number was extrapolated from: (1) the often-quoted estimate that the US has 300,000 Sovereign Citizens; and (2) that Canada has about 1/10th the population of the US. That makes the 30,000 estimate essentially worthless. Compounding that issue, the 300,000 Sovereign Citizen figure is, itself, nothing but a guess.⁶⁶

In Canada, pseudolaw rarely manifests within stable, organized entities, but instead exists in looser, if not chaotic, peer-to-peer social structures.⁶⁷ Public data does not support the existence of large organizations. For example, the largest known Detaxer⁶⁸ scheme was the Paradigm Education Group headed by Russell Porisky that operated between 2003–2008. That business' records indicate a total membership of 30 second-tier "educators," and 800 customers.⁶⁹

With other groups, such as the World Freeman Society, even less is known. At least in that instance a photograph of the Society's total membership records provides some basis to conclude that paid membership was, at most, in the low hundreds.⁷⁰

Certain government actors may have more information on specific limited subjects. For example, law enforcement will probably know the identity of some local-area pseudolaw adherents. Some pseudolaw document schemes require sending conventional authorities a formal declaration "opting out" of Canadian law and authority.⁷¹ Many pseudolaw adherents are what might be called "high friction" individuals, and frequently engage in criminal activity. During resulting police interactions, pseudolaw adherents usually deploy pseudolaw as a "get out of jail free" card.⁷² Similarly, the Canada Revenue Agency and the Public Prosecution Service of Canada are very well informed on pseudolaw strategies and persons who employ pseudolaw to evade taxes.

⁶⁵ Other investigators have also concluded this figure is a large overestimate, see e.g. Barbara Perry, David C Hofmann & Ryan Scrivens, "Broadening Our Understanding of Anti-Authority Movements in Canada" (2017) Canadian Network for Research on Terrorism, Security and Society Working Paper No 17-02 at 5; John McCoy, David Jones & Zoe Hastings, *Building Awareness, Seeking Solutions: Extremism & Hate Motivated Violence in Alberta* (Organization for the Prevention of Violence, 2019) at 13, 61, online (pdf): *Organization for the Prevention of Violence* <preventviolence.ca/publication/building-awareness-seeking-solutions-2019-report/>.

⁶⁶ Michelle M Mallek, "Uncommon Law: Understanding and Quantifying the Sovereign Citizen Movement" (MA Thesis, Naval Postgraduate School, 2016) [unpublished] at 61–67, online: *Naval Postgraduate School* <calhoun.nps.edu/handle/10945/51576>.

⁶⁷ Perry, Hofmann & Scrivens, *supra* note 65 at 20–22; McCoy, Jones & Hastings, *supra* note 65 at 70–71.

⁶⁸ As their name implied, Detaxers employed pseudolaw in attempts to evade income tax obligations: Netolitzky, "History #1," *supra* note 4 at 616–24; Netolitzky, "Lawyers," *supra* note 1 at 430–34, 441–48.

⁶⁹ *R v Porisky*, 2016 BCSC 1757 at para 15.

⁷⁰ World Freeman Society, "8lbs of Notices of Mutual Consent, just from those dwelling in the lands known as Canada...." (13 July 2017), posted on *World Freeman Society*, online: <www.facebook.com/WorldFreemanSociety/photos/a.124956854355/10155434378819356/>. This photograph was posted by Patrick Karl Haag, the chief logistical operator behind the World Freeman Society and its websites.

⁷¹ The Freeman-on-the-Land "Notice of Understanding and Intent and Claim of Right" is a well-documented example of such: Netolitzky, "History #1," *supra* note 4 at 612, 624–25. See also Netolitzky, "History #3," *supra* note 16 at Part III for how the Magna Carta Lawful Rebels employed form documents in a similar, though much more threatening, manner.

⁷² McCoy, Jones & Hastings, *supra* note 65 at 21–22 relied heavily on information gleaned in this manner to profile Alberta's pseudolaw population, which at that time was dominated by the declining Freeman-on-the-Land movement.

However, with most pseudolaw movements or populations we know much less. While Canadian pseudolaw groups are rarely truly secret, they generally do not co-operate with external investigation.⁷³ The degree and depth of commitment to pseudolaw also varies from dabblers through to the highly committed.⁷⁴

One method to gather a rough appreciation of the interest and attention received by pseudolaw concepts, gurus, and movements is to observe the volume of associated Internet activity. For example, an inference can be drawn if guru A's YouTube videos have 5,000-10,000 views, but guru B attracts only several hundred views per video. Similarly, social media group membership volume and service subscriptions provide outside observers some idea of relative success or community interest.

Another alternative is to attempt to measure and track Canadian pseudolaw via reported court and tribunal decisions. This court decision "headcount" approach seems to be common with legal academics.⁷⁵ While *Meads* is broadly cited in relation to Canadian and Commonwealth pseudolaw,⁷⁶ "citing up" *Meads* is an ineffective way to measure pseudolaw activity. That decision has been cited in over 300 court cases, but some do not relate to pseudolaw. Worse, much Canadian pseudolaw jurisprudence does not reference *Meads*. To date, over 700 post-*Meads* reported Canadian court and tribunal decisions have been identified that involve pseudolaw litigation.

One available measurement is the relative annual volume of identified reported Canadian pseudolaw decisions. Figure 1 illustrates the temporal distribution of 1,298 reported Canadian judgments issued between 1995–2021, where those judgments resulted from litigation where: (1) pseudolaw strategies are known to have been employed; (2) pseudolaw motifs were identified in docket records or court documents; or (3) other information identified proceedings as having a pseudolaw aspect or character.

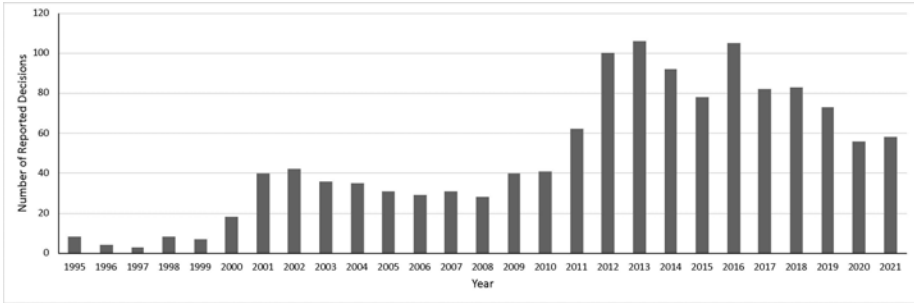
⁷³ Perry, Hofmann & Scrivens, *supra* note 65 at 12–13. See also S McGrath, *Freeman on the Land and Anti-Government Ideologies: A Biographical Perspective* (MA Thesis, University of Alberta, 2016) [unpublished]; Vanessa McCuaig, *The Uncanny Doubling of Sovereign and Citizen: Anti-State Narrativity in Alberta* (MA Thesis, McGill University, 2019) [unpublished], online (pdf): <escholarship.mcgill.ca/concern/theses/mk61rn55v>.

⁷⁴ Netolitzky, "Attack," *supra* note 57 at 175–82; Perry, Hofmann & Scrivens, *ibid* at 34–45; McCoy, Jones & Hastings, *supra* note 65 at 62.

⁷⁵ See e.g. Megan Campbell & Julie Macfarlane, *Self-Represented Litigants & Legal Doctrines of 'Vexatiousness'* (National Self-Represented Litigants Project, 2019), online (pdf): *National Self-Represented Litigants Project* <representingyourselfcanada.com/wp-content/uploads/2019/12/Vexatious-Litigant-Report-Final.pdf>; R McKay White, "Seven Years of Accessible Justice: A Critical Assessment of *Hryniak v. Mauldin's* Culture Shift" (2022) 59:3 *Alta L Rev* 611; Gerard J Kennedy, "Rule 2.1 of Ontario's *Rules of Civil Procedure*: Responding to Vexatious Litigation While Advancing Access to Justice?" (2018) 35 *Windsor YB Access Just* 243.

⁷⁶ Netolitzky, "Hammer," *supra* note 2 at 1186–87.

**FIGURE 1:
REPORTED CANADIAN PSEUDOLAW COURT AND TRIBUNAL DECISIONS PER YEAR**



Reported Canadian court and tribunal decisions issued between 1995 and 2021 where litigation related to that decision involved pseudolaw strategies, pseudolaw motifs, or is known to have a pseudolaw aspect or character. N=1298.

The data in Figure 1 should be approached with caution. First, the set of identified pseudolaw decisions does not accurately reflect how much pseudolaw litigation has occurred in Canada because:

1. no reliable method exists to identify pseudolaw litigation and decisions that result from pseudolaw litigation;⁷⁷
2. in Canada, reported court and tribunal decisions represent a small fraction of overall dispute activity, since most litigation and its results are never captured in a manner that can be measured via caselaw database searches;⁷⁸ and
3. the fraction of court decisions that are reported are very likely a non-random sample because:
 - (a) reported written decisions are more frequently issued by certain bodies such as appeal courts or decision-making bodies that do not conduct oral proceedings;
 - (b) interlocutory, ancillary, and “housekeeping” procedural decisions are less likely to result in reported judgments; and
 - (c) a decision-maker is more likely to reserve judgment and issue a written decision when faced with complex issues and facts, versus a simple dispute, or where the result is “cut and dry.”⁷⁹

These factors mean Figure 1 is best only relied upon to evaluate the relative progression of pseudolaw-related litigation in Canadian courts over time. The primary conclusion that

⁷⁷ Netolitzky, “Family,” *supra* note 61 at 964–65; Netolitzky, “Lawyers,” *supra* note 1 at 429.

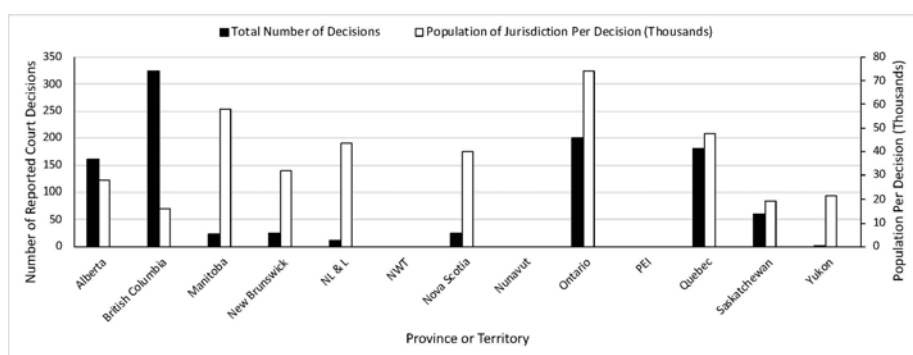
⁷⁸ Netolitzky, “Lawyers,” *ibid*; Donald J Netolitzky, “The Grim Parade: Supreme Court of Canada Self-Represented Appellants in 2017” (2021) 59:1 *Alta L Rev* 117 at 158–59. For example, less than 1 percent of court decisions at the Alberta Court of Queen’s Bench in 2016 resulted in a written reported court judgment.

⁷⁹ Netolitzky, “Lawyers,” *ibid* at 429–30.

can be drawn from Figure 1 is that, despite a total lack of courtroom success, detailed legal rebuttals, and near universal public rejection, pseudolaw litigation remains a significant factor for Canadian courts.⁸⁰

The known set of Canadian reported court decisions that relate to pseudolaw litigation does provide some other insights into how pseudolaw emerges in Canadian courts and tribunals. Figure 2 illustrates the number of identified pseudolaw decisions in different Canadian provinces and territories, and how the volume of decisions per jurisdiction relates to that jurisdiction's population.

**FIGURE 2:
VOLUME AND FREQUENCY OF
REPORTED PSEUDOLAW DECISIONS PER PROVINCE AND TERRITORY⁸¹**



Volume of reported Canadian court decisions that result from pseudolaw-related litigation by province and territory, and the number of jurisdiction residents per reported pseudolaw decision, using all identified pseudolaw-related reported court decisions from 1959 to 2021 (N=1016). Jurisdiction populations are from the last quarter of 2021. No cases were identified from the Northwest Territories, Nunavut, and Prince Edward Island.

Figure 2 indicates that if Canada has a geographical pseudolaw “hot spot,” that it is western Canada, and particularly British Columbia. The Federal Courts and Tax Court of Canada also encounter a large volume of pseudolaw-related litigation: 211 reported decisions in 1959–2021, in almost equal proportions (Federal Courts: 44.5 percent; Tax Court of Canada: 55.5 percent).

While pseudolaw could potentially be applied in many different litigation contexts, pseudolaw is typically embedded in a broader anti-authority narrative. That means pseudolaw is most often employed in conflicts between individuals and larger actors, such as institutions

⁸⁰ In *Unrau v National Dental Examining Board*, 2019 ABQB 283 at para 179 [Unrau #2], Associate Chief Justice Rooke concludes OPCA litigation makes up a “substantial” fraction of abusive litigation in the Alberta Court of Queen’s Bench, and OPCA litigants are nearly 1/3 of persons subject to “vexatious litigant” orders.

⁸¹ “Population Estimates, Quarterly” (21 December 2022), online: *Statistics Canada* <www150.statcan.gc.ca/t1/tb11/en/tv.action?pid=1710000901&cubeTimeFrame.startMonth=10&cubeTimeFrame.startYear=2021&cubeTimeFrame.endMonth=10&cubeTimeFrame.endYear=2021&referencePeriods=20211001%2C20211001>.

and government.⁸² Person-versus-person pseudolaw disputes are unusual. For example, pseudolaw is almost never employed in a family law context.⁸³

Table 2 illustrates that most Canadian reported pseudolaw judgments fall into four broad litigation type categories.

**TABLE 2:
FOUR MOST FREQUENT APPLICATIONS OF
PSEUDOLAW CONCEPTS IN CANADIAN LITIGATION**

Litigation Subject	n	Frequency in Reported Court and Tribunal Decisions
Attempts to avoid paying tax, or criminal prosecution for failure to pay tax	504	39.0%
Pseudolaw-based attacks	217	16.8%
“Get out of jail free” defence vs criminal processes and prosecution	198	15.3%
Debt elimination / “money for nothing”	150	11.6%

The four most common litigation applications and objectives of pseudolaw concepts in Canadian court and tribunal proceedings between 1959–2021. “Pseudolaw-based attacks” are instances where disputes seek to illegally impose obligations, penalties, and/or restrictions on opposing parties based on pseudolaw strategies and concepts. N=1,309.

Notably, two of these categories are only relevant to government authorities (tax resistance, “get out of jail free”), while the other two commonplace litigation subjects are usually employed against government and/or institutional actors. For example, debt elimination and “money for nothing” strategies are very often used against banks and other institutional lenders.

This pattern of pseudolaw litigation subjects is not unique to Canada. A review by Brian Slater of 530 US Sovereign Citizen court judgments used a different litigation subject classification schema, but, nevertheless, concluded most (85 percent) Sovereign Citizen litigation targets were a government actor, and identified a high frequency of income tax litigation, criminal defence, and “retaliation” strategies.⁸⁴ Similarly, debt elimination is a central focus of UK and Republic of Ireland pseudolaw communities.⁸⁵

Figure 3 illustrates how the frequency of the four major applications of pseudolaw in Canada has changed over time.

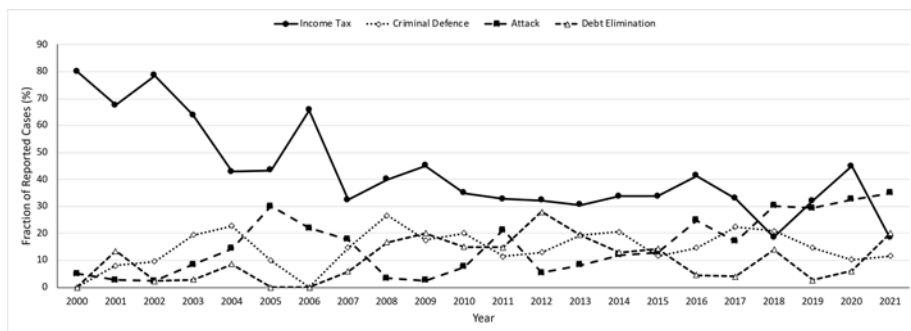
⁸² Netolitzky, “Itch,” *supra* note 1 at 166–67, 170, 187.

⁸³ Netolitzky, “Family,” *supra* note 61. See also Slater, *supra* note 58 at 44–47. Child-related pseudolaw litigation instead often involves state seizure and custody of children: Netolitzky, “Family,” *ibid* at 966.

⁸⁴ Slater, *ibid*. See also Donald J Netolitzky, “A Rebellion of Furious Paper: Pseudolaw as a Revolutionary Legal System” (Paper delivered at the CEFIR Symposium “Sovereign Citizens in Canada,” Montreal, 3 May 2018), [unpublished] at 6–7, online (pdf): <www.researchgate.net/publication/325053364_A_Rebellion_of_Furious_Paper_Pseudolaw_as_a_Revolutionary_Legal_System>.

⁸⁵ Netolitzky, “Itch,” *supra* note 1 at 176–77; Netolitzky, “Pathogen,” *supra* note 6 at 10–14.

**FIGURE 3:
GENERAL SUBJECT MATTER OF
REPORTED PSEUDOLAW CASES PER YEAR**



The four most common litigation applications and objectives of pseudolaw concepts in Canadian court and tribunal proceedings between 2000–2021. “Income Tax” are actions where pseudolaw is used to attack income tax obligations and criminal tax evasion proceedings. “Attacks” are instances where disputes seek to illegally impose obligations, penalties, and/or restrictions on opposing parties based on pseudolaw strategies and concepts. N=1,309.

The most dramatic change is the decrease in tax-related pseudolaw judgments. This pattern illustrates the Detaxers were the first dominant Canadian pseudolaw movement. The tax-related pseudolaw litigation fraction will probably drop even further, as criminal prosecutions and Tax Court of Canada litigation that involve Detaxer scheme gurus and customers is now completing and no post-2010 replacement anti-tax schemes have emerged.

III. PRE-PANDEMIC PSEUDOLAW GROUPS DID NOT RE-ACTIVATE

Almost all concepts that make up current Canadian pseudolaw first emerged within an initial wave of pseudolaw groups that appeared circa 2000.⁸⁶ Netolitzky, “History #1,” chronicled the rise and dissolution of two distinct Canadian pseudolaw movements between 2000–2015: the anti-income tax “Detaxers,”⁸⁷ and the social parasite and predominately criminal “Freeman-on-the-Land” community.⁸⁸ Both groups were moribund, if not dead, prior to the current COVID-19 pandemic. For the most part, that remains unchanged.

⁸⁶ Netolitzky, “Pathogen,” *ibid* at 6–8, details how US concepts were “localized” to fit a Canadian context.

⁸⁷ Netolitzky, “History #1,” *supra* note 4 at 616–24; Netolitzky, “Lawyers,” *supra* note 1 at 430–34, 441–48. The Detaxers employed at least parts of the US pseudolaw matrix, but, prior to the introduction of that pseudolaw into Canada, Canada was developing its own, Canada-specific anti-tax strategies. Netolitzky, “History #1,” *ibid* at 613–16 surveys this poorly documented “Pre-Detaxer” phenomenon, while Netolitzky, “History #3,” *supra* note 16 at Part II.A reveals the surprising resurgence of a Pre-Detaxer pseudolaw scheme.

⁸⁸ Netolitzky, “History #1,” *ibid* at 624–27.

A. DETAXERS

The Detaxers were a collection of, sometimes networked, tax evasion scheme promoters and their customer pool.⁸⁹ Many of the Detaxer movement's promoter gurus are now either dead (for example, Lawrence Agecoutay a.k.a. King Kaneekaneet, Tommy "UsuryFree" Kennedy, Ernst-Frederick (Fred) Kyburz, Sikander Abdulali Muljiani a.k.a. Alex Muljiani, Kenneth Robert McMordie a.k.a. Byron Fox, Eldon Warman) or have been incarcerated on criminal charges (for example, Agecoutay, Debbie Arlene Anderson, Donald Grant Baudais, Gerald Wilfred Blerot, Aurelius Carlton Branch, Pierre Cardin, Denise Marie Eddy, Eric Ho, Daniel J. Lavigne, Keith Lawson, Michael Spencer Millar, Jean Mark Paquin, Russell Anthony Porisky, Edwin Siggelkow, Donna Marie Stancer, Lawrence Watts). The last Detaxer operations, DeMara Consulting and Fiscal Arbitrators,⁹⁰ and "Dave's Tax Reorganization,"⁹¹ collapsed circa 2010.

The Public Prosecution Service of Canada's highly effective criminal prosecutions crushed the core Detaxer leadership and demolished any Detaxer scheme's credibility. Tax Court of Canada proceedings to determine taxpayer penalty consequences for DeMara Consulting and Fiscal Arbitrators' tax evasion scheme clientele continue.⁹²

The Detaxers were, at best, at the tail end of their operations when the 2012 *Meads* decision first identified and described pseudolaw in a systematic manner. In many ways, *Meads* was chiefly a review of the Detaxers' in-court failures and a rebuttal of concepts promoted by Detaxer gurus.⁹³ The Detaxer leadership made no response or reply to *Meads*.⁹⁴

Post-2015, remnant Detaxer activity is conducted by two former Paradigm Education Group "educators."⁹⁵ Michael Spencer Millar, a.k.a. "JD," operates the "private person (wo/man at common law)"⁹⁶ and "SueWrongoers"⁹⁷ websites. Both offer for-pay subscriptions to access pseudolaw tutorials. Millar appears to have attracted little interest. Concepts promoted by Millar do not appear in any identified Canadian reported court decisions. Instead, most recent website content is recycled anti-vaccine and "scamdemic" claims. Millar's conviction and incarceration for pseudolaw tax evasion activities⁹⁸ very likely negatively impacted Millar's credibility and community status.

The "Apu's Theory" website operated by Eric Ho was the second post-2015 Detaxer operation. Ho was facing criminal prosecution for his Paradigm Education Group activities, and in 2012 absconded out of country. Ho in August 2022 surrendered to authorities, pled

⁸⁹ *Ibid* at 616–24.

⁹⁰ Netolitzky, "Lawyers," *supra* note 1 at 430–34.

⁹¹ *R c Cardin*, 2021 QCCS 930; *R c Paquin*, 2021 QCCS 931.

⁹² See e.g. *Strachan v The Queen*, 2020 TCC 37; *Rattai v The Queen*, 2020 TCC 55; *Bowker v The Queen*, 2021 TCC 14. See also Netolitzky, "Lawyers," *supra* note 1 at 430–34.

⁹³ Netolitzky, "Hammer," *supra* note 2 at 1183–84.

⁹⁴ *Ibid* at 1196.

⁹⁵ Netolitzky, "History #1," *supra* note 4 at 622–24; Netolitzky, "Lawyers," *supra* note 1 at 441–48.

⁹⁶ Online: <private-person.com>.

⁹⁷ Online: <suewringdoers.com>.

⁹⁸ *R v Millar*, 2016 BCSC 2039, sentenced 2017 BCSC 402, aff'd 2019 BCCA 298.

guilty to tax evasion offences, and on 1 December 2022 was sentenced to 30 months in jail.⁹⁹ Prior to his surrender, Ho attempted to perpetuate a variation upon Paradigm Education Group theories: that a legal distinction exists when the *Income Tax Act*¹⁰⁰ and other legislation use “Social Insurance Number” versus “social insurance number.” Ho operated the “Apu’s Theory” website¹⁰¹ between 2016–2019, claiming to be a collective of anti-tax activists and government whistleblowers with fanciful pseudonyms, for example, “Neville Longbottom,” a “Canada Revenue Agency defector.” This pattern of using pseudonyms extended to Ho personally, who self-identified as “Apu Nahasapeemapetilon, Ph.D. Jr.,” the Kwik-E-Mart convenience store owner character in “The Simpsons” television cartoon.

A particularly strange aspect of Ho’s activities is that he, as Apu Nahasapeemapetilon, in 2016 submitted and published two Detaxer articles via the Social Sciences Research Network (SSRN) service: “Unreported Income Not on a CRA T1 Form is Not Always Tax Evasion,”¹⁰² and “Attorning to Canada’s Income Tax Act Office (or, Why Is the Name in All Caps?).”¹⁰³ These detail “Apu’s Theory.” While candidate SSRN publications undergo pre-publication review, SSRN processes clearly have issues when faced with obvious pseudolegal claims, such as the purported legal significance of text letter case, and universally rejected Strawman Theory. Apu’s Theory has been evaluated and dismissed in several reported Canadian income tax cases.¹⁰⁴ Like other Detaxers, Ho provided no substantive rebuttal to *Meads*, other than to simply dismiss that decision as “*obiter*.”¹⁰⁵

David Kevin Lindsay¹⁰⁶ is the notable exception to the Detaxer mass extinction. This is not a surprise. Lindsay has been an outlier within Canadian pseudolaw circles from the beginning. In the 2000s, Lindsay was not only an active litigator,¹⁰⁷ but also Canada’s leading pseudolaw theorist¹⁰⁸ and most active in-court layperson representative.¹⁰⁹ Lindsay conducted highly sophisticated direct and proxy appeals, where Lindsay raised “access to justice” issues that, subsequently, have become the subject of legal academic attention.¹¹⁰ Lindsay’s law-

⁹⁹ Canada Revenue Agency, “Richmond Paradigm ‘Educator’ on the Run for Over a Decade Sentenced to Jail for Tax Protester Scheme” (2 December 2022), online: *Government of Canada* <www.canada.ca/en/revenue-agency/news/newsroom/criminal-investigations-actions-charges-convictions/20221202-richmond-paradigm-educator-run-sentenced-jail-tax.html>.

¹⁰⁰ RSC 1985, c 1 (5th Supp).

¹⁰¹ Online: *Internet Archive* <web.archive.org/web/20181108053353/https://canadaincometaxislegal.is/>; see also Apu Nahasapeemapetilon, online: <twitter.com/apunotanofficer>.

¹⁰² Apu Nahasapeemapetilon, “Unreported Income Not on a CRA T1 Form Is Not Always Tax Evasion” (25 June 2016), online (pdf): <papers.ssrn.com/sol3/papers.cfm?abstract_id=2800623> [Nahasapeemapetilon, “Unreported”].

¹⁰³ Apu Nahasapeemapetilon, “Attorning to Canada’s *Income Tax Act* Office (or, Why Is the Name in All Caps?)” (28 March 2016), online: <papers.ssrn.com/sol3/papers.cfm?abstract_id=2801642>.

¹⁰⁴ *William Russell v The Queen*, 2016 TCC 122; *Simon Marples v The Queen*, 2017 TCC 129. Ho, in another paper, claims the negative outcome in *William Russell v The Queen* actually supports his pseudolegal scheme: Apu Nahasapeemapetilon, “Does the *Russell* Tax Court Order Validate Apu’s Theory? aka ‘Apu’s Theory, Part 4’” (2018), online: <www.scribd.com/document/388024240/Does-Russell-Tax-Court-Order-Validate-Apus-Theory>.

¹⁰⁵ Nahasapeemapetilon, “Unreported,” *supra* note 102 at 2, 75.

¹⁰⁶ Netolitzky, “History #1,” *supra* note 4 at 620–21.

¹⁰⁷ *Meads*, *supra* note 19 at paras 100–107.

¹⁰⁸ *Ibid*; Netolitzky, “History #1,” *supra* note 4 at 620–21.

¹⁰⁹ Pre-2018, Lindsay acted as a layperson litigation representative in 26 reported decisions: Netolitzky, “Lawyers,” *supra* note 1 at 429. That almost certainly greatly understates Lindsay’s actual “lawyering” activities. Lindsay also filed eight Supreme Court of Canada leave to appeal applications, and at least three more via proxy appellants: Donald J Netolitzky & Richard Warman, “Enjoy the Silence: Pseudolaw at the Supreme Court of Canada” (2020) 57:3 *Alta L Rev* 715 at 732–34 [Netolitzky & Warman, “Silence”].

¹¹⁰ Netolitzky & Warman, “Silence,” *ibid* at 732, 744, 761–63.

related interests extended outside income tax issues. For example, Lindsay authored a text on “travelling” strategies: pseudolaw claims that governments cannot legislate or impose criminal sanctions on motor vehicle use.¹¹¹

Post-*Meads*, Lindsay too lapsed into inactivity, only making rare lecture and YouTube video appearances. Lindsay instead pursued a \$630,000 British Columbia Supreme Court civil claim against Dan Ambrosi, a former collaborator. That amount was 10 percent of a real property sales transaction where Lindsay acted as Ambrosi’s representative and negotiator.¹¹² Lindsay, who was represented by legal counsel, was successful at trial, but the British Columbia Court of Appeal concluded Lindsay could not demand the agreed upon payment, since Lindsay was not authorized in law as a licenced real estate agent.¹¹³

Lindsay re-emerged with the COVID-19 pandemic. Lindsay immediately became a central anti-government activist and vaccine rejection actor in Kelowna and Penticton, British Columbia, organizing public resistance and leading large weekly demonstrations that breached quarantine restrictions.¹¹⁴ As a result, Lindsay personally received at least three \$2,300 fines,¹¹⁵ though these sanctions are probably of limited tangible effect. Lindsay lives on a disability pension and is therefore “judgment-proof.”¹¹⁶

Lindsay also re-activated his “Common Law Education and Rights” (CLEAR) organization, with a new website¹¹⁷ that includes pandemic skeptic materials, rally and protest information, and template documents, but also advertises “how-to” seminars by Lindsay on how persons other than peace officers may use the *Criminal Code* private information process to initiate criminal proceedings.¹¹⁸ Lindsay has written a sophisticated

¹¹¹ David Kevin Lindsay, *Rights Denied! How Your Government Has Stolen Your Right to Use the Highways You Pay For!* (Winnipeg: AaA, 1999), online: <www.mediafire.com/file/bvrb9y88yb89mrb/Lindsay_-_Rights_Denied.pdf/file>.

¹¹² *Lindsay v Ambrosi*, 2019 BCSC 358 at paras 9–25, rev’d 2019 BCCA 442 [*Lindsay BCSC*].

¹¹³ *Ibid.*

¹¹⁴ Iain Burns, “‘Freedom Activist Group’ to Protest Against COVID-19 Restrictions in Kelowna,” *KelownaNow* (5 May 2020), online: <www.kelownanow.com/watercooler/news/news/COVID_19/Freedom_activist_group_to_protest_against_COVID_19_restrictions_in_Kelowna#s_105325>; Jesse Day, “‘End the Lock-Down’ Protestors Hit the Streets in Penticton,” *Revelstoke Review* (22 November 2020), online: <www.revelstokereview.com/news/end-the-lock-down-protesters-hit-the-streets-in-penticton/>; Colin Dacre, “Protest Leader’s Strange Past: Kelowna Anti-Mask Protest Leader Has Long Profited off Conspiracy Theorists, Rubbed Shoulders with White Nationalists,” *Castanet* (15 December 2020), online: <www.castanet.net/news/Kelowna/319195/Kelowna-anti-mask-protest-leader-has-long-profited-off-conspiracy-theorists-rubbed-shoulders-with-white-nationalists>; “She’s a Liar: Kelowna Anti-COVID-19 Restriction Rally Organizer Takes Aim at Dr. Bonnie Henry,” *iNFOnews* (16 January 2021), online: <infotel.ca/newsitem/shes-a-liar-kelowna-anti-covid-19-restriction-rally-organizer-takes-aim-at-dr-bonnie-henry/it80168?fbclid>; “Kelowna ‘Mega Rally’ Draws About 250 Protestors Against Public Health Orders to Combat COVID-19,” *CBC News* (13 February 2021), online: <www.cbc.ca/news/canada/british-columbia/kelowna-mega-rally-draws-similar-numbers-to-past-events-1.5913821>; Doyle Potenteau, “Vaccine Mandate: Protesters Rally Outside Kelowna RCMP Building, Cite Right to Choose for Officers,” *Global News* (3 November 2021), online: <globalnews.ca/news/8348020/covid-vaccine-mandate-rally-kelowna-rcmp/>.

¹¹⁵ “RCMP Issue Third \$2,300 Fine to Organizer of Anti-Mask Rally in Kelowna,” *CBC News* (16 January 2021), online: <www.cbc.ca/news/canada/british-columbia/anti-mask-rally-kelowna-1.5876556>; Drea Humphrey, “Kelowna Man Fined \$9,000 for COVID Charges Says Goal Is to ‘Make an Example’ of Him,” *Rebel News* (18 January 2021), online: <www.rebelnews.com/kelowna_man_fined_9000_for_covid_charges_says_goal_is_to_make_an_example_of_him>. Lindsay personally reports he has now been ticketed 48 times in relation to “rallies”: “David Lindsay: Kelowna Bylaw Ticket Update?” (7 January 2022), online (blog): *Canadian Association for Free Expression* <cafe.nfshost.com/?p=7102>.

¹¹⁶ *Lindsay BCSC*, *supra* note 112 at para 13.

¹¹⁷ Online: *CLEAR* <clearbc.org>.

¹¹⁸ *Criminal Code*, RSC 1985, c C-46, ss 504, 507.1.

textbook on this subject, *The Annotated Criminal Charging Procedure in Canada*,¹¹⁹ that provides detailed step-by-step guidance to conduct the private information process, along with template documents, and court forms for all Canadian jurisdictions. This text is sold on the CLEAR website.

The CLEAR website's contents make obvious that Lindsay continues to advocate his long-standing pseudolaw positions, such as that loans with interest are illegal as "usury," taxes are unconstitutional, and "travelling" motor vehicle licensing and operation concepts.¹²⁰ Lindsay has also resumed giving public seminars on his pseudolaw theories.¹²¹ That said, Lindsay does not appear to have initiated legal, or pseudolegal, processes or proceedings during the pandemic. This inaction is surprising, because Lindsay is the best informed and most experienced litigator in Canada's pseudolaw community.¹²² One explanation for why Lindsay has chosen to protest and lead, rather than litigate, is that Lindsay is subject to British Columbia court access restrictions as a vexatious litigant.¹²³ Another troubling development is an escalation of Lindsay's physical activity, since he is now facing criminal assault charges that appear to be related to his "scamdemic" resistance activities.¹²⁴ Lindsay has not appeared in resulting court proceedings,¹²⁵ but has launched a constitutional challenge to the *Royal Canadian Mounted Police Act*,¹²⁶ and RCMP operations in British Columbia.¹²⁷ The City of Kelowna has applied for an injunction that names Lindsay and seeks court ordered steps in response to continuing CLEAR organized protests in the city.¹²⁸

Lindsay is now the sole active inheritor of the Detaxer pseudolaw tradition, and has attracted a substantial local-area base of supporters and allies. Lindsay is the only Detaxer personality who has clearly benefitted from the social stresses associated with the current COVID-19 pandemic. Whether Lindsay translates that regional success into a broader following outside interior British Columbia, and further court activity, remains to be seen.

¹¹⁹ David K Lindsay, *The Annotated Criminal Charging Procedure in Canada* (C.L.E.A.R.). This text exists in multiple undated versions.

¹²⁰ Reviewed in Sarteschi, *Sovereign Citizens*, *supra* note 5 at 12–29.

¹²¹ Action4Canada, "Webinar: Common Law Made CLEAR," online: <action4canada.com/empower-hour-david-lindsay-constitution-and-freedom-issues>; Action4Canada, "Common Law Made CLEAR, Criminal Charges, Updates, Q&A and More!" (7 September 2022), online (video): <rumble.com/vlj7ity-judge-rosses-decision-how-to-file-criminal-charges-and-live-q-and-a.html>.

¹²² Accredited lawyers are also engaged in questionable COVID-19-related litigation, for example Michael Swinwood (*Amikwabi v Pope Francis*, Ottawa CV-21-00085478-00CP (Ont Sup Ct J), struck out as frivolous by rule 2.1 in 2021 ONSC 1069, aff'd 2022 ONCA 236) and Rocco Galati (*Action4Canada v British Columbia (Attorney General)*, Vancouver VLC-S-S217586 (BCSC); *Vaccine Choice Canada v Justin Trudeau, Prime Minister of Canada*, Toronto CV-20-00643451-0000 (Ont Sup Ct J); *MA v De Villa*, 2021 ONSC 3828; *Gill v Maciver*, 2022 ONSC 1279).

¹²³ *Attorney General of BC v Lindsay*, 2007 BCCA 165, leave to appeal to SCC refused, 32026 (15 November 2007).

¹²⁴ Colin Dacre, "Charges for Protest Leader: Kelowna COVID Protest Leader Charged with 2 Counts of Assault," *Castanet* (29 December 2021), online: <www.castanet.net/news/Kelowna/355701/Kelowna-COVID-protest-leader-charged-with-2-counts-of-assault#355701>; Nicholas Johansen, "Trial Set for Protest Leader: Assault Trial for Kelowna's David Lindsay Set for March 2023," *Castanet* (19 May 2022), online: <www.castanet.net/news/Kelowna/369456/Assault-trial-for-Kelowna-s-David-Lindsay-set-for-March-2023>.

¹²⁵ Kathy Michaels, "Well-Known Anti-Mandate Protest Leader Skips Court Date, Warrant Issued," *Global News* (18 February 2022), online: <globalnews.ca/news/8631390/well-known-anti-mandate-protester-skips-court-warrant/>.

¹²⁶ RSC 1985, c R-10.

¹²⁷ "Come & Pack the Court Tomorrow in Kelowna & Support Freedom Fighter Dave Lindsay" (9 February 2023), online (blog): *Canadian Association for Free Expression* <cafe.nfshost.com/?p=8546>.

¹²⁸ Kathy Michaels, "City of Kelowna Takes Aim at 'Freedom Rallies' and Their Organizer," *Global News* (18 January 2023), online: <globalnews.ca/news/9419269/freedom-rallies-organizer-focus-bc-city-lawsuit/>.

B. FREEMEN-ON-THE-LAND

The Freeman-on-the-Land movement was the sole creation of street comedian Robert Arthur Menard,¹²⁹ though Menard derived his concepts from Canadian Detaxer pseudolaw localized by Eldon Warman.¹³⁰ Menard invented Freemanism in the early 2000s, and the movement grew gradually as it spread through politically leftist, anti-globalization, anti-authority, and social activist groups, but, more than anything else, marijuana advocacy and trafficking networks.¹³¹ The predominately criminal Freeman-on-the-Land culture¹³² peaked around 2010, and then rapidly declined as its adherents discovered that Freeman pseudolaw was legally ineffective.¹³³

The collapse of Freemanism had multiple causes. First, Freeman gurus were confronted with a direct and detailed jurisprudential challenge. *Meads* was published near the peak of the Freeman-on-the-Land phenomenon. The key Freeman gurus provided no meaningful response.¹³⁴ Freeman gurus instead dismissed in-court failures by scolding their rank-and-file customers: they “were doing it wrong,” and should “practice due diligence.” The two primary Freeman authorities, Menard and Dean Clifford,¹³⁵ were then arrested. Subsequent criminal court proceedings demonstrated pseudolaw sold by these gurus was ineffective, even in their own hands.¹³⁶

The in-court failures of the two keystone Freeman gurus were aggravated by a little-acknowledged but critical component of the pseudolaw ecosystem: the Quatloos website forums.¹³⁷ Quatloos is a US-based international anti-scam community that was acknowledged by Associate Chief Justice Rooke as an expert information and commentary source on pseudolaw subjects.¹³⁸ When Menard and Clifford attempted to sustain their status by second-hand announcements and YouTube videos, Quatloos anti-Freeman activists obtained and published Menard’s and Clifford’s criminal proceedings court documents.¹³⁹ Those court filings revealed Menard and Clifford were dismal and incompetent court participants, flailing through multiple ineffective pseudolaw schema, rather than the sophisticated self-educated legal experts they had proclaimed to be. Menard was also “outed” as not practising his own doctrines. For example, Menard had an Ontario driver’s licence, despite Menard having: (1) taught there was no legal requirement for licences; (2) boasted he sent law enforcement scurrying off when law enforcement demanded such; and (3) claimed a driver’s licence had

¹²⁹ *Meads*, *supra* note 19 at paras 121–24; Netolitzky, “History #1,” *supra* note 4 at 624–26; Netolitzky, “Pathogen,” *supra* note 6 at 9–10; Netolitzky, “Hammer,” *supra* note 2 at 1194–95; Perry, Hofmann & Scrivens, *supra* note 65 at 15–18.

¹³⁰ Netolitzky, “Pathogen,” *ibid*.

¹³¹ *Ibid* at 9.

¹³² Netolitzky, “Lawyers,” *supra* note 1 at 434–41; *Unrau #2*, *supra* note 80 at paras 194–97.

¹³³ Netolitzky, “History #1,” *supra* note 4 at 626–27; Perry, Hofmann & Scrivens, *supra* note 65 at 16–18; McCoy, Jones & Hastings, *supra* note 65 at 59–71.

¹³⁴ Netolitzky, “Hammer,” *supra* note 2 at 1194–99.

¹³⁵ Netolitzky, “History #1,” *supra* note 4 at 626–27; Netolitzky, “Hammer,” *ibid* at 1171, 1195; Perry, Hofmann & Scrivens, *supra* note 65 at 16–17.

¹³⁶ *R v Clifford*, Winnipeg CR14-01-33786 (Man QB); *R v Menard*, Toronto 4813998143500374700, 4813998143500427000 (Ont Ct J); *Menard v R* (18 March 2015), Montreal T-43-15 (FC).

¹³⁷ Online: <www.quatloos.com/Q-Forum/index.php>.

¹³⁸ *Meads*, *supra* note 19 at para 655.

¹³⁹ “Dean Clifford - A Tale of Two Gurus” (12 June 2013), online: <www.quatloos.com/Q-Forum/viewtopic.php?f=48&t=9364>; “Robert Arthur Menard FOTL (Freeman on the Lam)” (5 January 2015), online: <www.quatloos.com/Q-Forum/viewtopic.php?f=48&t=10492>.

toxic effects, since it was a contract, created “joinder,” and thereby empowered government and court jurisdiction.

Menard’s remnant credibility evaporated when Menard repeatedly promised money-for-nothing via his “Association of Canadian Consumer Purchasers” (ACCP) scheme.¹⁴⁰ Substantial numbers of Canadian Freemans paid Menard ACCP subscription and membership fees, but never received their “Menard Card” debit cards, free money, or any other promised benefits.

At present, almost nothing remains of the Freeman community. Affiliated websites and discussion forums, such as ThinkFree¹⁴¹ and the World Freeman Society,¹⁴² are no longer online. Menard, personally, maintains a minimal social media presence.¹⁴³ Despite his acknowledged expertise in self-promotional videos, Menard has not posted a pseudolaw-related video in years.¹⁴⁴

Similarly, Clifford’s “Earth Stewardship Cooperative” website is no longer online,¹⁴⁵ and Clifford’s guru “money for nothing” programs appear to have ceased.¹⁴⁶ Until recently, Clifford’s social media presence¹⁴⁷ has been quite limited, but Clifford is now promoting “private” commercial interactions,¹⁴⁸ and has advised obtaining advantage via legitimate legal mechanisms, legislation, and organizations such as unions. Clifford has disavowed pseudolaw he previously promoted during the Freeman-on-the-Land period, and stresses that equity trumps common law. Clifford most recently has associated himself with the Diagonol¹⁴⁹ and Plaid Army militia-style movements¹⁵⁰ linked to arrests during the 2022 Coutts border blockade, and subsequent conspiracy to murder charges.¹⁵¹ If correct, that means Clifford has abandoned his traditional Freeman-on-the-Land leftist and neo-hippy persona¹⁵² for his former right-wing and racist affiliations.¹⁵³ More recently, in October 2022,

¹⁴⁰ Netolitzky, “Hammer,” *supra* note 2 at 1179.

¹⁴¹ Online: *Internet Archive* <web.archive.org/web/20140105081927/http://thinkfreeforums.info>.

¹⁴² Online: *Internet Archive* <web.archive.org/web/20180621042351/http://worldfreemansociety.org>; <web.archive.org/web/20180626223607/https://worldfreemansociety.org/forum/index>.

¹⁴³ Chiefly a personal Facebook website, Robert Menard, online: <www.facebook.com/robert.menard.52>.

¹⁴⁴ “mrmitee,” online: <www.youtube.com/user/mrmitee/videos>.

¹⁴⁵ Online: *Internet Archive* <web.archive.org/web/20201024165143/https://earthsc.org/>.

¹⁴⁶ See e.g. *Scotia Mortgage Corporation v Landry*, 2018 ABQB 856, court access restrictions imposed 2018 ABQB 951. Clifford was personally made subject to court access restrictions as a vexatious litigant during this litigation.

¹⁴⁷ “Dean Clifford,” online: <www.facebook.com/Deancliffordchannel>; <steemit.com/@deanclifford>;

“PTL Media Now,” online: <www.youtube.com/channel/UCNDh2jc1joYSmhfxrbnkw>; “‘ESC Prospect Room’ Dean Clifford,” online: *Telegram* <t.me/escProspectRoom>; “Dean Clifford,” online: *Telegram* <t.me/s/deanclifford>; “Wolverdean,” online: <www.bitchute.com/channel/wolverdean/>.

¹⁴⁸ Online: <www.eschange.online>.

¹⁴⁹ Online: <www.diagonol.org>. See Peter Smith & Mathew Kriner, “The Diagonol Movement and Militant Accelerationism” (8 June 2022), online: <www.anti-hate.ca/diagonol_movement_militant_accelerationism> for a detailed review of this developing anti-authority movement.

¹⁵⁰ See e.g. Derek Rants, “Dean Clifford” (13 April 2022), online: <www.youtube.com/watch?v=RHhojDpnZK8>.

¹⁵¹ Paula Tran, “Anti-Hate Experts Concerned About Possible Neo-Fascist Involvement at Alberta Trucker Convoy,” *Global News* (15 February 2022), online: <globalnews.ca/news/8621125/canadian-anti-hate-network-concerned-diagonol-coutts-border-protest-diagonol/>; Meghan Grant, “4 Men Accused of Conspiring to Murder RCMP Officers to Be Tried Together: Prosecutors,” *CBC News* (25 April 2022), online: <www.cbc.ca/news/canada/calgary/coutts-border-protest-conspiracy-to-murder-trials-1.6430369>.

¹⁵² Clifford’s close affiliates indicate that was always a “false front” to assist Clifford’s self-promotion: Burnaby49, “Breaking News!” (8 September 2015) posted on *Dean Clifford - A Tale of Two Gurus*, online: <www.quotloos.com/Q-Forum/viewtopic.php?f=48&t=9364&p=206615>.

¹⁵³ Netolitzky, “History #1,” *supra* note 4 at 626.

Clifford unsuccessfully ran for mayor of Clearwater, British Columbia, receiving 11.2% of the vote.¹⁵⁴

Freemanism did not die because former Freemen have shifted or evolved their political and social objectives. Gurus and adherents continue to reject government and institutional authority in their social media activity. Freeman-type pseudolaw activity and litigation has not revived during the current COVID-19 pandemic, though review of former members' social media shows nearly universal negative responses to "scamdemic" health safety measures and vaccination programs. Former Freemen are still hateful, selfish, and often criminal, but are no longer pseudolaw activists.

That, in many ways, makes sense. Freemanism was a results-oriented scheme, where gurus promised, and adherents sought, a life of "do as I please," and "take what I want." That did not work out. Freemen imagined themselves as social revolutionaries, but, instead, were categorically rejected by Canadian society.¹⁵⁵ Many Freemen suffered serious legal, criminal, financial, family, and social consequences.

C. THE CHURCH OF THE ECUMENICAL REDEMPTION INTERNATIONAL

The Church of the Ecumenical Redemption International (CERI), a pseudolaw "pot church" operated by Edmonton resident "minister" or "paraclete" Edward Jay Robin Belanger, is the only first wave pseudolaw movement that has endured the past several decades relatively unaffected.¹⁵⁶ This apparent continuity and longevity is somewhat illusory. CERI's membership has probably never exceeded a couple dozen individuals, so, in that sense, Belanger's group can hardly be said to have "collapsed." It never really got off the ground. Belanger's followers are also mercenary and transitory. While many of CERI's members have an extensive pseudolaw record, the usual pattern is CERI "ministers" adopt and then abandon Belanger's concepts for different schemes promoted by other pseudolaw gurus.¹⁵⁷

In that sense CERI is very much a "one-man show." Belanger obviously has attempted to use the COVID-19 pandemic to expand CERI, but with no real success. Belanger's social media resources¹⁵⁸ frequently include "scamdemic"-style pandemic skeptic and vaccine rejection motifs, but that did not attract many new "parishioners" to CERI and Belanger. No identified case decisions or records illustrate CERI concepts being applied to challenge

¹⁵⁴ "Mayoral Candidate Dean Clifford," online: <www.facebook.com/profile.php?id=100085681268323>; James Peter, "Clearwater Mayoral Candidate Has Lengthy Legal History, Hate-Filled Online Presence," *CFJC Today* (23 September 2022), online: <cfjctoday.com/2022/09/23/clearwater-mayoral-candidate-has-lengthy-legal-history-hate-filled-online-presence/>; CFJC Today, "Blackwell Defeats Clifford in Clearwater; Two Newcomers Elected to Council," *CFJC Today* (15 October 2022), online: <cfjctoday.com/2022/10/15/blackwell-defeats-clifford-in-clearwater-two-newcomers-elected-to-council>.

¹⁵⁵ Netolitzky, "Itch," *supra* note 1 at 182.

¹⁵⁶ *Meads, supra* note 19 at paras 134–39, 183–88; *Potvin (Re)*, 2018 ABQB 652 at paras 102–34; Netolitzky, "History #1," *supra* note 4 at 627–28; Stephen A Kent & Robin D Willey, "Sects, Cults, and the Attack on Jurisprudence" (2013) 14:2 *Rutgers JL & Religion* 306 at 327–29.

¹⁵⁷ See e.g. James Kenneth Knutson: *Knutson (Re)*, 2018 ABQB 858, court access restrictions imposed 2018 ABQB 1050; *Knutson (Re)*, 2021 ABQB 367.

¹⁵⁸ Principally Facebook (Edward Jay Robin Belanger, online: <www.facebook.com/Romans1129>) and YouTube (Paraclete Edward Jay Robin, online: <www.youtube.com/user/Owlmon>).

pandemic-related quarantines, medical responses, and vaccination. Instead, recent CERI litigation has been abusive, retaliatory lawsuits that target government, law enforcement, and court actors.¹⁵⁹

D. SECOND-WAVE FREEMAN-LIKE PSEUDOLAW GURUS

Many former adherents to the Freeman movement did not immediately disengage with pseudolaw after the unequivocal public failure of the first-generation Freeman gurus. Instead, first-wave Freemanism was followed by a kind of intellectual echo, a cluster of second-generation gurus whose politics and social perspectives generally corresponded to that of the original Freeman adherent population.

The pseudolaw espoused by these follow-up gurus is usually recognizably derived from Menard's and Clifford's concepts, though sometimes incorporating novel aspects and US Sovereign Citizen influences. The typical scenario is second-wave Freeman-like pseudolaw gurus added something to "fix" what had, purportedly, been missed or misunderstood by the original Freeman leadership.

None of these second-wave gurus either remains active or has maintained a substantial popular follower base. These branches of pseudolaw are dead ends. Many second-wave gurus and organizations are all but undocumented except by online pseudolaw critics, such as Quatloos. The following review briefly surveys and examines these individuals and relevant Canadian case law that responded to and rejected concepts marketed by these gurus.

1. MARCEL RILEY BESSETTE AND THE PEACE MAKER SOCIETY

The Peace Maker Society¹⁶⁰ is a Winnipeg-based pseudolaw entity created circa 2013 by Marcus Riley Bessette, whose legal name appears to be Marc Riley Zurawell.¹⁶¹ Bessette and the Peace Maker Society have offered a range of pseudolaw-based services, including kits to remove state authority, financial programs, and unlicensed legal services. While Bessette is very active on the Peace Maker Society website and has uploaded many YouTube videos,¹⁶² the Peace Maker Society never attracted a significant customer base. No identified reported cases relate to Bessette, the Peace Maker Society, or its concepts. Most recently, Bessette has announced he is replacing the conventional government, since he is the Emperor

¹⁵⁹ See e.g. *Minister Alfred [Fred] Potvin v John D Rooke*, 2019 FCA 285; *Minister David Williams v Julie Payette, Chrystia Freeland, John D Rooke, Jody Wilson-Raybould, Yasir Naqvi, Paul Bonifero, Cornelia Mews, J Gary McMahon, Lowell Hunking, Susan Stothart, Natalie Beausoleil, Steven Scharger, Brian Bencze, Wesley Beatty, E Simpson, Vince Hawks, Mike Gordon, Rick Mackay, Dawn Connor, Shawn Retzler, Charles Constable, David Cass, Taryn McCormick, David Lewis, Norman Sabourin, Dan Mayer, and Martha Milczynski*, 2019 FC 800; *Associate Chief Justice John D Rooke v David Williams*, 2020 FC 1070.

¹⁶⁰ Online: <www.peacemakersociety.org>.

¹⁶¹ Hilfskreuzer Möwe, "Marcel Bessette - The Peace Maker Society" (22 September 2013), online: <www.quatloos.com/Q-Forum/viewtopic.php?t=9560>.

¹⁶² Bessette's original YouTube channel has been deleted. His most recent channel, "Word on the Streets" (formerly online: <www.youtube.com/channel/UCVZUOOkExowqUIw30GZ0BRg>), was also recently deleted.

of Canada.¹⁶³ Bessette (Zurawell) was one of the Manitoba RCMP's ten most wanted persons for uttering threats in September 2022.¹⁶⁴

2. JOHN SPIRIT

John Spirit is a pseudonym; this individual's actual name is not known.¹⁶⁵ Since 2012, Spirit, a resident of Châteauguay, Quebec,¹⁶⁶ operated a series of websites¹⁶⁷ where Spirit published his ideas, and marketed tutoring services and information kits. Like many post-Menardian pseudolaw gurus, Spirit relied extensively on YouTube lecture videos to explain and propagate his concepts.¹⁶⁸

Spirit is noteworthy and unusual for his extensive reference to, and reliance on, actual Canadian appellate jurisprudence.¹⁶⁹ Spirit explained that Freeman gurus were incorrect to deny the operation and authority of Canadian law, and, instead, that pseudolaw's purported extraordinary effects could be achieved via conventional Canadian courts and case law. Spirit claimed international human rights treaties such as the *Universal Declaration of Human Rights*,¹⁷⁰ *International Covenant on Economic Social and Cultural Rights*,¹⁷¹ and *International Covenant on Civil and Political Rights*¹⁷² are supraconstitutional authorities. According to Spirit, human rights treaties are incorporated into Canadian law as *Canadian Charter of Rights and Freedoms*¹⁷³ rights, typically as aspects of section 7 of the *Charter*.¹⁷⁴ With that foundation, Spirit identified specific treaty provisions to cancel out Canadian legislation and common law principles. Combined with core pseudolaw concepts, that stratagem, purportedly, eliminated state authority, removed links to the Strawman, and so on.

Spirit initially attracted much attention in Freeman circles, but his reliance on quotes from Canadian law was also his scheme's undoing. Spirit distorted Supreme Court of Canada jurisprudence, "quote mining" decisions to create the false impression that international treaties are supraconstitutional authorities. The 2017 Alberta Court of Queen's Bench

¹⁶³ A redacted version of the now deleted YouTube video in question has been posted with commentary by a pseudolaw skeptic: Hannah Reloaded, "Our Favorite Sovereign Citizen Marcel Bessette Has a Mental Breakdown || SovCit Watch" (7 July 2021), online (video): <www.youtube.com/watch?v=kkLZIZTeovA>.

¹⁶⁴ Royal Canadian Mounted Police, "Marc Riley Zurawell," online: *Internet Archive* <web.archive.org/web/20220917235843/https://www.rcmp-grc.gc.ca/en/news/2021/marc-riley-zurawell>.

¹⁶⁵ Netolitzky, "Hammer," *supra* note 2 at 1183.

¹⁶⁶ Perry, Hofmann & Scrivens, *supra* note 65 at 44.

¹⁶⁷ Online: *The Place To Think It Through* <eternallyaware.com>; *Enforcing Natural Rights and Freedoms Intrinsic Rights* <johnspirit.education>.

¹⁶⁸ "eternallyaware," online: <www.youtube.com/c/eternallyaware/>.

¹⁶⁹ Another atypical aspect of Spirit is that he adorned his car with pseudolegal insignia and statements, apparently to demonstrate his special status, "About Me," online: *Internet Archive* <web.archive.org/web/20160325232343/http://eternallyaware.com/about-me.html>. This practice is much more common among US pseudolaw adherents, see "The Cars of Infowars," online: <www.reddit.com/r/InfowarriorRides/> for diverse examples.

¹⁷⁰ *Universal Declaration of Human Rights*, GA Res 217A (III), UNGAOR, 3rd Sess, Supp No 13, UN Doc A/810 (1948) 71.

¹⁷¹ *International Covenant on Economic Social and Cultural Rights*, 16 December 1966, 993 UNTS 3 (entered into force 3 January 1976).

¹⁷² *International Covenant on Civil and Political Rights*, 19 December 1966, 999 UNTS 171 (entered into force 23 March 1976).

¹⁷³ Part I of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982* (UK), 1982, c 11 [*Charter*].

¹⁷⁴ *Ibid*, s 7.

*Pomerleau v. Canada (Revenue Agency)*¹⁷⁵ decision conducted a detailed review and rebuttal of Spirit's claims and illustrated Spirit had misrepresented actual Canadian law. Spirit made no response to this decision, deleted reference to *Pomerleau* from his social media, and largely discontinued his public guru activities.¹⁷⁶

Spirit is a significant figure in the Freeman movement's history for several reasons. First, his treaty- and *Charter*-based scheme represented a dramatic maturation in how Freeman appreciated and approached law. Until Spirit, Freeman gurus essentially ignored actual sources of legal information and authority, and, instead, exhibited little to no understanding of the Canadian court system and legal concepts.¹⁷⁷ Spirit, instead, referenced *Meads*¹⁷⁸ to conclude (correctly) that the *Charter* may provide a valid mechanism to challenge government action and legislation. Spirit's materials and lectures explicitly cited and relied on treaties and case law, verifiable authorities referenced and applied in legitimate Canadian legal proceedings.

Freemen responded favourably. Many adopted and employed this new data-based methodology. Spirit's concepts and arguments appear in many reported Canadian judgments.¹⁷⁹ At least two other gurus copied Spirit's ideas: Wally Dove (discussed below), and Belanger.¹⁸⁰ In many senses, Spirit's variation on Freemanism represents the intellectual and analytical high-point of this now moribund school of Canadian pseudolaw.

3. WALLY DOVE – THE HUMAN RIGHTS DEFENDERS LEAGUE IN CANADA

Wallace (Wally) Raymond Maxwell Dove¹⁸¹ was a registered Ontario accountant who initially appeared as a pro-pseudolaw expert witness in Detaxer proceedings.¹⁸² Following a complaint by lawyer Richard Warman, Dove was ultimately expelled and lost that professional status due to Dove's attempts to employ pseudolaw strategies personally and professionally.¹⁸³

¹⁷⁵ 2017 ABQB 123 [*Pomerleau*].

¹⁷⁶ Spirit posted a number of COVID-19 subject videos early in the current pandemic, then once again lapsed into inactivity.

¹⁷⁷ Netolitzky, "Hammer," *supra* note 2 at 1198.

¹⁷⁸ *Meads*, *supra* note 19 at para 266.

¹⁷⁹ See e.g. *Pomerleau*, *supra* note 175; *Marcien Paul Emile Bouchard DBA Bouchard Bros Ltd and Bouchard Natural Power Inc v Her Majesty the Queen*, 2016 FC 983; *Canadian Imperial Bank of Commerce v McDougald*, 2017 ABQB 124; *d'Abadie v Her Majesty the Queen*, 2018 ABQB 298; *Fazakas v R*, 2018 NBQB 12; *Fiander v Mills*, 2015 NLCA 31; *Re Gauthier*, 2017 ABQB 555; *Hayhurst v Her Majesty the Queen*, 2018 ONSC 257, costs imposed 2018 ONSC 1211; *Howard v Attorney General of Canada*, 2018 ONSC 785, appeal ref'd 2019 ONCA 351; *Mark Lynch v Her Majesty the Queen*, 2017 FCA 248; *R v Freer*, 2017 ONCJ 623; *R v White*, 2017 BCPC 380; *Walsh v Attorney General of Canada*, 2018 ONSC 2251. In some of these judgments the Spirit treaty-based scheme is not described by the court, but atypical language specific to Spirit's arguments, like operating in a "full legal capacity," indicates Spirit's influence on this litigation.

¹⁸⁰ See e.g. *CP (Re)*, 2019 ABQB 310, court and child access restrictions imposed 2019 ABQB 388, where CERI Bible-based Strawman claims are combined with Spirit's international treaties as supraconstitutional authority motif.

¹⁸¹ Netolitzky, "Hammer," *supra* note 2 at 1193–94; Netolitzky & Warman, "Silence," *supra* note 109 at 751–52.

¹⁸² See e.g. *R v Dove*, [2005] 1 CTC 43 (Ont Sup Ct J); *R v Maleki*, 2006 ONCJ 401.

¹⁸³ *Re Dove* (14 November 2003), online: *Certified General Accountants Association of Ontario Professional Conduct Tribunal* <assets.cpaontario.ca/protecting-the-public/hearings-appeals/cases/cga/1011page21042.pdf>.

After a period of apparent inactivity, Dove re-activated circa 2013 and began teaching Spirit's international treaty and *Charter* theories under the aegis of "The Human Rights Defenders League in Canada."¹⁸⁴ Dove purported that he and the Defenders League were conducting litigation to unlock extraordinary freedom and benefits on that basis. Dove, for a period, attracted significant interest from the remnant Freeman population¹⁸⁵ and published *The Solution to ALL Our Problems*, a book that described ideas copied from Spirit and a litigation methodology.¹⁸⁶ The Human Rights Defenders League (probably Dove himself) also produced the most substantial rebuttal of *Meads* by a Freeman movement guru: *Meads v. Meads an Analysis*.¹⁸⁷ However, in summary, that response was essentially that, to properly interpret *Meads*, one replaces all instances of the word "person" with "the Strawman."

Dove and several collaborators did attempt a Spirit-style litigation scheme, and in a series of Federal Court lawsuits demanded hundreds of millions of dollars, and a kind of treaty-mandated social welfare apparatus.¹⁸⁸ Dove led this litigation personally, which continued to the Supreme Court of Canada where the Dove group's application for leave was denied.¹⁸⁹ Dove and the Defenders League have subsequently dropped offline, though Dove's Detax-era activities ended up as the target of court analysis and commentary in 2020 when the Ontario Superior Court of Justice dismissed a lawsuit by Dove's Detaxer customers that alleged the Canada Revenue Agency had breached *Charter* rights and caused tort injury when it responded to Dove's pseudolaw.¹⁹⁰

4. WILFRED JOHN EMONTS A.K.A. "MARCUS" OF SERVANT KING

Starting in 2013, an Ontario resident who called himself "Marcus" began teaching a variation on pseudolaw with a heavy religious component via videos and transcripts hosted on the "Servant King" website. In subsequent years, that website underwent a series of iterations, building off the original nine video series.¹⁹¹ Unusual for a pseudolaw guru, Marcus implied, cryptically, that he was a former lawyer who had died. The most recent iteration of the Servant King website suggests Marcus is legally trained, with "J.D., LL.M., and J.S.D." degrees.¹⁹²

¹⁸⁴ Online: *Internet Archive* <web.archive.org/web/20130518152010/http://humanrightsdefenders.ca/>.

¹⁸⁵ Reviewed in "Wally Dove – From CCRA Toady to Human Rights Defender" (8 July 2013), online: <www.quatloos.com/Q-Forum/viewtopic.php?f=48&t=9418>.

¹⁸⁶ The Human Rights Defenders League In Canada, *The Solution To ALL Our Problems* (self-published, revised 2012). This text circulated in a number of electronic and hard-copy versions.

¹⁸⁷ The Human Rights Defenders League, *Meads v. Meads an Analysis* (3 February 2013), online: <www.scribd.com/document/215311764/An-Analysis-of-Meads-v-Meads>.

¹⁸⁸ This collective litigation led to a number of reported court decisions: *Bursey v Canada*, 2015 FC 1126; *Bursey v Canada*, 2015 FC 1307; *Charles Norman Holmes v Her Majesty the Queen and the Attorney General for Canada*, 2016 FC 918; *Wally Dove, Jason Dove, Glenn Bursey and Michael Bursey v Her Majesty the Queen*, 2016 FCA 231; *Caitlin Doell v Her Majesty the Queen, Her Majesty the Queen in Council, the Receiver General, the Attorney General, the Federal Finance Minister*, 2016 FCA 235.

¹⁸⁹ *Wally Dove, Jason Dove, Glenn Bursey and Michael Bursey v Her Majesty the Queen*, 2016 FCA 231, leave to appeal to the SCC refused, 37487 (1 June 2017).

¹⁹⁰ *Softcom Solutions Inc v Canada (Attorney General)*, 2020 ONSC 3290. The Court imposed \$273,000 in costs against Dove's clients: *Softcom Solutions Inc v Canada (Attorney General)*, 2020 ONSC 5385.

¹⁹¹ Original website, online: *Internet Archive* <web.archive.org/web/20130613063537/http://servantking.info/>; current website, online: <www.servantking.info>. See also Hilfskreuzer Möwe, "Marcus the Ex-Lawyer Reveals the ServantKing" (26 June 2013), online: <www.quatloos.com/Q-Forum/viewtopic.php?f=48&t=9393> that tracks "Marcus" and the Servant King project.

¹⁹² Online: <www.servantking.info/marcuss-mind.html>.

None of those claims are true. Instead, Marcus is Wilfred John Emonts, an individual with a much more interesting personal background. Emonts was an internationally recognized expert in breeding and training birds of prey. For many years, Emonts operated the “Falconry Centre,” a medieval-themed private tourist facility near Tottenham, Ontario. Emonts also offered bird-control services to airports,¹⁹³ that culminated in a drone “Robofalcon” intended to drive off pest birds.¹⁹⁴

The Falconry Centre closed after regulatory disputes with government animal and wildlife authorities, and tax debt issues.¹⁹⁵ Emonts’ very large raptor collection was either seized or euthanized. Emonts converted the Centre into a large-scale marijuana grow-op. Multiple raids and seizures followed.¹⁹⁶ Marcus at one point published a website, “House of Emonts,” linked to Servant King that acknowledged his true identity and reviewed events surrounding the fate of the Falconry Centre.¹⁹⁷ No evidence supports Emonts has any formal legal training. The Law Society of Ontario has no record of any lawyer with the Emonts last name.

Emonts’ peak Servant King activity occurred between 2013 and his drug offence criminal trial in 2017. During this period Emonts, as Marcus, published several dozen pseudolaw tutorial videos with associated PowerPoint presentations and transcripts.¹⁹⁸ Servant King attracted substantial attention in the former Freeman community, but Emonts’ lectures are more metaphysical Strawman Theory discourse than orthodox legal instruction. For example, Emonts described the “necromantic” character of court proceedings, with the dead Strawman personas made undead by the instruction: “All rise.”

Emonts was acquitted of his drug-related charges in late 2017.¹⁹⁹ What little is known suggests Emonts successfully argued the Crown had not proven his seized crops were marijuana, rather than legal hemp. Post-acquittal, Servant King lapsed into inactivity, until 2021, when Emonts updated his website, conducted tutorial “Webinars,” and, ultimately, released a new \$250 collection of 18 “Enlightened Program” videos.²⁰⁰

No Canadian case law appears to report pseudolaw arguments derived from Emonts’ theories. That may be because what Emonts teaches, in a byzantine, metaphysical, and indirect manner, is nothing more than conventional Strawman Theory motifs, so there are no

¹⁹³ *Slaytor v Emonts*, 1990 CanLII 4960 (ON WSIAT) and *Slaytor v Emonts*, 1991 CanLII 5107 (ON WSIAT) report on unfortunate firearms-related injuries that occurred in this business.

¹⁹⁴ Jennifer Uscher, “It’s a Bird! It’s a Plane! It’s... Robofalcon!” (26 March 2002), online: *Popular Science* <www.popsci.com/military-aviation-space/article/2002-03/its-bird-its-plane-its-robofalcon/>.

¹⁹⁵ *ITA v Wilfred John Emonts* (19 February 2014), Ottawa ITA-2331-14 (FC); *ITA v Debra Emonts (Deborah Rita Emonts)* (10 March 2014), Ottawa ITA-3366-14 (FC). These files are enforceable debt judgments in favour of the Canada Revenue Agency.

¹⁹⁶ “Marijuana Grow-Op Busted at Falconry Centre in Tottenham” (5 July 2012), online: *Internet Archive* <web.archive.org/web/20120708091625/http://www.madhunt.com/marijuana-falconry-centre-20120705.html>; Rob Cooper, “Marijuana Grow-Op Busted in Near Tottenham,” *CTV News* (21 August 2015), online: <barrie.ctvnews.ca/marijuana-grow-op-busted-in-near-tottenham-1.2527640>.

¹⁹⁷ Online: *Internet Archive* <web.archive.org/web/20161004165303/http://houseofemonts.info/>.

¹⁹⁸ These videos are no longer published by Emonts personally, but mirror archives exist on YouTube: “Marcus Servent King,” online (video): <www.youtube.com/playlist?list=PL5X2iRLTNyrhS1WUapj3sS2i-S2ya0PwG>; “Servant King: Unravelling by Marcus,” online (video): <www.youtube.com/playlist?list=PLnlnjUumFqC6FhLuAthyG_GSzGpmsjbp>.

¹⁹⁹ Brad Pritchard, “Ex-Falconer from Tottenham Found Not Guilty on Drug Charges,” *Alliston Herald* (11 November 2017), online: <www.simcoe.com/news-story/7880423-ex-falconer-from-tottenham-found-not-guilty-on-drug-charges/>.

²⁰⁰ “Enlighten Programs,” online: <www.servantking.info/enlighten-programs.html>.

“fingerprints” to identify Servant King-based litigation. However, another explanation for why Emonts’ ideas have not been reflected in Canadian pseudolaw jurisprudence is simply because Servant King concepts have no tangible application to court proceedings. Emonts explicitly rejects conventional law and courts, and denounces lawyers as parasitic “Dissemblers.”²⁰¹ Emonts and Servant King is therefore a complex free-standing philosophical/religious expression of pseudolaw, rather than the usual guru “how-to” tutorials. Whether Emonts’ renewed product will have a meaningful consumer base is unknown.

5. ROBERT PAGÉ A.K.A. “ROB IN THE PAGÉ FAMILY”
A.K.A. “WHITE WALKING FEATHER”

Robert Pagé is a western-Canadian pseudolaw guru whose early pseudolaw activities were as a customer of Paradigm Education Group “educator” Denise Marie Eddy.²⁰² Subsequently, Pagé adopted a pseudolaw name, “rob in the pagé family,” but now more typically self-identifies as “White Walking Feather.”

Pagé developed an “isolationist” approach to pseudolaw, moving his family to a rural northern Alberta property where Pagé adopted an “off-the-grid” lifestyle out of his self-built “Earthship” residence²⁰³ living a marginal life of sustenance-level self-support and salvage.²⁰⁴ While Pagé’s methodology resembles the “micronation” schemes used by certain pseudolaw adherents outside Canada,²⁰⁵ Pagé does not claim equal nation-state status to government and conventional authorities, but rather to simply become invisible, as far as possible.

Pagé proselytized his lifestyle, philosophy, and pseudolaw concepts via online media,²⁰⁶ seminars, a self-published book: *Graduating Life with Honours: Conscious Self-Government in God’s Kingdom*,²⁰⁷ and as the protagonist of “UNGRIP,” a broadly viewed documentary film on Pagé’s lifestyle and beliefs.²⁰⁸

Pagé’s primary recommended response to state authority is non-interaction. Government authority can be eliminated by isolation, rejecting any connection with the state, and remaining under “spiritual authority.” Otherwise, Pagé’s claims about the “Fictional Realm” (real law) are unremarkable Sovereign Citizen-derived Strawman Theory, claims that governments are corporations, and claims that legal authority only derives from contracts.²⁰⁹

²⁰¹ “Dissemblers,” online: <www.servantking.info/dissemblers.html>.

²⁰² Pled guilty to tax evasion and counselling fraud, and sentenced to two years less a day, *R v Eddy* (16 February 2016), Edmonton 120435839Q1 (Alta QB).

²⁰³ A partially underground construct of soil, used tires, and greenhouse materials, see online: *Earthship Biotope* <www.earthshipglobal.com>.

²⁰⁴ This was a genuine effort, as documented on Pagé’s “steemit” website, “WhiteWalkingFeather,” online: <steemit.com/@wwf>.

²⁰⁵ Recently reviewed in Harry Hobbs & George Williams, *Micronations and the Search for Sovereignty* (Cambridge: Cambridge University Press, 2022) at 65–72.

²⁰⁶ Pagé has used many websites and services, a partial list includes, online: <www.facebook.com/rob.pagefamily>; “WhiteWalkingFeather,” *supra* note 204; “White Walking Feather,” online: <www.patreon.com/pacemarts>; “White Walking Feather’s School for the Pacem Arts,” online: <[pacemarts.com](https://www.pacemarts.com)>.

²⁰⁷ rob in the pagé family, *Graduating Life with Honours: Conscious Self-Governance in God’s Kingdom* (self-published, 2015).

²⁰⁸ TheAnswerto1984is, “UNGRIP (Full Length Movie)” (1 October 2011), online (video): <www.youtube.com/watch?v=tScuHwVtRcY>.

²⁰⁹ rob in the pagé family, *supra* note 207 at 16–33; “White Walking Feather,” *supra* note 206.

In certain senses Pagé’s pseudolaw resembles that of Emonts, in that Pagé presents pseudolaw primarily as a philosophical or religious perspective, not a tangible mechanism to confront and rebut court authority, and thereby achieve extraordinary rights and authority. Pagé’s approach is heavily coloured by New Age perspectives and approaches. For example, Pagé formerly collaborated with “Goddess Worship” communities, and Pagé frequently denounces his own masculinity, violence, and “colonist” characteristics. No known Canadian reported court cases appear to employ Pagé’s pseudolaw, and Pagé himself has, at most, had only limited involvement with Alberta courts. In 2021, Pagé relocated to British Columbia, and appears to maintain a minimum customer pool.²¹⁰

6. WILFRED KEITH THOMPSON A.K.A. KATE OF GAIA

Another minor player in the Canadian post-Freeman era is Wilfred Keith Thompson.²¹¹ Thompson, a once prominent Canadian Freeman-on-the-Land, subsequently moved to the UK and re-invented himself as “Kate of Gaia,” a leading UK pseudolaw guru. Thompson’s initial fame was a video, “judge bows to Sovereign,” a recorded 2010 Manitoba court appearance that has over 764,000 YouTube views.²¹²

In the UK, Kate has taught a variation on Strawman Theory centred on claims that governments own personal names as intellectual property.²¹³ People’s unknowing use of those names is the basis for state authority. Social media activity suggests Kate’s so-called “legal name fraud” UK follower group is, at most, in the low thousands, but Kate did somehow in 2016 locate funds to conduct a large-scale commercial billboard campaign in the UK, with hundreds of billboards that proclaimed:

LEGAL NAME FRAUD
THE TRUTH
IT’S ILLEGAL TO USE A LEGAL NAME

This widespread but puzzling publicity campaign led to media investigation and commentary.²¹⁴

Kate’s current status is unclear. While Kate focuses on the UK, Kate has made appearances at Canadian pseudolaw events.²¹⁵ The legal name fraud concept occasionally

²¹⁰ Pagé as of February 2023 has a total of 12 Patreon subscribers.

²¹¹ “Crown Drops the Case Against Suspects in Guelph Break-In,” *Guelph Mercury Tribune* (20 March 2012), online: <www.guelphmercury.com/news-story/2771277-crown-drops-the-case-against-suspects-in-guelph-break-in/>.

²¹² LoudStudios, “Freeman in Court – Judge Bows to Sovereign – Canada” (7 September 2010), online (video): <www.youtube.com/watch?v=yzjv20sC5CY>.

²¹³ See online: <losethename.com>; kate of kaea, “Birth Certificate Fraud; Clausula Rebus Sic Stantibus,” online: <kateofgaia.wordpress.com>; “Meet Kate of Gaia,” online: <legalnamefraudradio.wordpress.com/meet-kate-of-gaia/>; kate of kaea, “Birth Certificate Fraud; Clausula Rebus Sic Stantibus,” online: *Internet Archive* <web.archive.org/web/20170930050939/http://truthbillboards.net/>; kate of kaea, “Birth Certificate Fraud; Clausula Rebus Sic Stantibus,” online: <bccrss.wordpress.com>.

²¹⁴ Jon Kelly, “The Mystery of the ‘Legal Name Fraud’ Billboards,” *BBC News* (11 June 2016), online: <www.bbc.com/news/magazine-36499750>; Geoff Whelan, “‘Legal Name Fraud’ – The Truth? It’s Hogwash,” *The Skeptic* (1 April 2016), online: <www.skeptic.org.uk/2016/04/legal-name-fraud-the-truth-its-hogwash/>.

²¹⁵ Netolitzky, “Magic,” *supra* note 33 at 1083.

appears in Canadian jurisprudence,²¹⁶ but no evidence suggests this is a popular Canadian pseudolaw strategy.

7. PRIVATE SECTOR ACT DOT COM

Between 2010–2015, a group led by Derek Ryan Johnson operated a website titled “Private Sector Act Dot Com”²¹⁷ and conducted a “Dollar Dealer” mortgage scam that incorporated pseudolaw debt elimination and court authority rejection strategies.²¹⁸ At one point, Johnson claimed to operate a vigilante court, the “Alberta Court of Kings Bench,” and issued superficially authentic-looking “court” documents. Conventional litigation management of this group’s court misconduct was unsuccessful, but Johnson and his collaborators ceased public activity after Johnson and collaborator Kevin Kumar were incarcerated for contempt. Associate Chief Justice Rooke identifies this group as an example of the uncommon “Litigation for Profit and Advantage” abusive litigant category.²¹⁹

The original Private Sector Act Dot Com website was abandoned in 2016, but recently Kumar re-registered that domain as part of a second-generation debt and mortgage elimination scheme titled “United We Stand People” that parallels the original Private Sector Act Dot Com project.²²⁰ “United We Stand People” appears to have attracted minimal customer interest and has little known associated litigation.²²¹

8. SOVRAN NATIONS

Netolitzky, “History #1,” describes the vigilante Tacit Supreme in Law Court, and two affiliated pseudolaw organizations: the Calgary-based United Sovran Nations, and Edmonton-area North Watchmen People’s Assembly.²²² These groups were followers of “Senior Chief Justice Andreas Pirelli,” whose actual name was Mario Antonacci. Antonacci first espoused pseudolaw in 2009–2010 as head of the Sovran Nations Embassies of Mother Earth²²³ in Montreal, but, when faced with criminal assault proceedings, Antonacci absconded to Calgary.²²⁴ Antonacci there established the most organized, and best-funded of the known Canadian pseudolaw institutions.²²⁵ Antonacci’s objective was separatist communities that detached themselves via pseudolaw techniques. Antonacci discretely marketed his project in Canadian and US pseudolaw circles. At the time of Antonacci’s arrest, his groups were purchasing land for “Infinite Nations” compounds and had organized

²¹⁶ See e.g. *R v Unger*, 2016 ABPC 46; *Potvin (Re)*, *supra* note 151 at para 27.

²¹⁷ Online: *Internet Archive* <web.archive.org/web/20130421095440/http://privatesectoract.com/>.

²¹⁸ *Unrau #2*, *supra* note 80 at paras 205–12. See also Hilfskreuzer Möwe, “Private Sector Act Dot Com” (27 April 2013), online: <www.quatloos.com/Q-Forum/viewtopic.php?f=48&t=10455>.

²¹⁹ *Unrau #2*, *ibid*.

²²⁰ “United We Stand People,” online: <unitedwestandpeople.com>; <lookinghomes4sale.wixsite.com/my-site>; <www.youtube.com/channel/UCvOfsnkFKtrRFpYf-IR9YA/>.

²²¹ *Gacias v Equifax Canada Co*, 2019 ABQB 640, action struck 2019 ABQB 739.

²²² Netolitzky, “History #1,” *supra* note 4 at 628–29. See also McCoy, Jones & Hastings, *supra* note 65 at 69–70 for further observations on this group.

²²³ “Sovran Nations Embassies of Mother Earth,” online: *Internet Archive* <web.archive.org/web/20100829061504/http://www.sovrannationsembassies.com/>; “SovranNations,” online: <www.youtube.com/channel/UCldkyHdEQ_aRfTzWfatImQA>.

²²⁴ Christiane Desjardins, “La prison pour le fugitif Antonacci,” *La Presse* (28 June 2014), online: <www.lapresse.ca/actualites/justice-et-affaires-criminelles/proces/201406/28/01-4779575-la-prison-pour-le-fugitif-antonacci.php>.

²²⁵ Netolitzky, “History #1,” *supra* note 4 at 628–29.

their own police, courts, and other institutions.²²⁶ After his 2013 arrest in Calgary during a landlord-tenant dispute, Antonacci was returned to Quebec and sentenced to two years and nine months, but that sentence was reduced on appeal for mental health reasons.²²⁷

The Tacit Supreme in Law Court and its affiliated subordinate “Embassies”²²⁸ then appear to have largely gone inactive. Antonacci now calls himself “Arunda,” and is one of a pair of Quebec-area instructors of “Magickey Teknik,”²²⁹ an alternative medicine therapy where hands operate as body maps, so that stimulating a part of a hand with a probe or ball or other object will (purportedly) provide physical benefit. For example, stimulating the skin between the third and fourth fingers allegedly influences anal and colonic function.²³⁰ Though unorthodox, Arunda’s instruction does not appear to involve pseudolaw. Larry Zachow, the leader of the North Watchmen People’s Assembly, died in 2016.²³¹ Two followers of Antonacci, Chris Hampton and Luke Michel Denis,²³² in 2017 announced the “Incite Insight” “Cutting Edge New Media Channel”²³³ and self-published a pseudolaw text: “The Freedom Handbook.”²³⁴ Nothing then followed.

Subsequent investigation has determined Antonacci’s group was a branch of a still larger pseudolaw network. The original central figure was a US citizen, “Sovran Signatory-Clan-Mother:Maryjane:Blackshear Monarch Matriarch Of The Kanabosm Clan,” leader of the “Sovran Unity Nations Embassy.” Blackshear and six other “Sovran Signatory-Clan-Mothers” purportedly derived authority from a document titled the “Camel’s Eye Treaty 408 A.D.”²³⁵ Al Carroll, an expert in false claims on Indigenous law, authority, and affiliation, concluded the Treaty is a fantastic and preposterous fiction concocted by Sovereign Citizens based on writings of Meredith M. Quinn.²³⁶ For example, among many other things, the Treaty claims North and South American First Nations populations in 408 AD were involved with the Roman Empire.²³⁷ This peculiar document integrates pseudolaw claims with a New Age marijuana-based matriarchy. Antonacci is also a signatory of the Camel’s Eye Treaty, a subordinate “Sovran-Steward” of the “Kanabosm Clan.”²³⁸

²²⁶ One of the few surviving online components of Antonacci’s Alberta projects is a 2013 recruitment video describing Antonacci’s separatist communities: EvolverCalgary, “Infinite Nations” (7 February 2013), online (video): <www.youtube.com/watch?v=k1-XcjFFV2c>.

²²⁷ *Antonacci c R*, 2014 QCCA 1889.

²²⁸ “The United Sovran Nations,” online: *Internet Archive* <web.archive.org/web/20130925023003/http://unitedsovrannations.org/>.

²²⁹ Online: *Magickey Teknik* <www.sujokacademy.club/index.php/fr/>; <www.facebook.com/MagickeyTeknikAcademy/>.

²³⁰ Online: *eBay* <i.ebayimg.com/00/s/MjQyWDU5MA==/z/BU0AAOSw44BYfvn9/\$_27.JPG>.

²³¹ “Larry Edgar Zachow,” online: <www.trinityfuneralhome.ca/obituary/larry-edgar-zachow/>.

²³² Denis originally was a collaborator with Menard: 13Passion4Truth, “Freeman Lectures - Robert Menard, Luke Denis – On Money” (1 December 2011), online (video): <www.youtube.com/watch?v=3h6-ghiTnc>.

²³³ Online: *Internet Archive* <web.archive.org/web/20170822101147/http://incite-insight.com/>.

²³⁴ Chris Hampton & Luke Denis, *The Freedom Handbook* (Xlibris, 2017).

²³⁵ “The Natural and International Laws Given by Our Divine Creator Ordained Sovran Signatory Clan-Mothers,” online: <en.calameo.com/read/0047058449f44df7f4a19> [“Natural and International Laws”].

²³⁶ Meredith M Quinn, *Dakota Proclamation: Study of Mythology of White America by a Savage* (Toltecs en Aztlan, 1972); Meredith M Quinn, *Dakota Timewalker* (self-published, 1982), online: <issuu.com/4thdisciplemedia/docs/timewalker>; Peacemaker 315, “Tribal Law, Meredith M. Quinn All Races Have Clan Mother Laws From Creator Great Spirit” (4 October 2021), online (video): <www.youtube.com/watch?v=2yivcBmWAEc>.

²³⁷ Al Carroll, “The Camel’s Eye Treaty Hoax” (5 June 2010), online: <beforeitsnews.com/native-american-news/2010/06/militia-movement-camels-eye-treaty-hoax-part-2-73187.html>; educatedindian, “Topic: Request for Help from Researchers: Camel’s Eye Treaty group at Akwasasne” (15 October 2009), online: *NAFPS Forum* <www.newagefraud.org/smf/index.php?topic=2394.0>.

²³⁸ “Natural and International Laws,” *supra* note 235 at 55.

Post-Treaty, the Kanabosm Clan and other signatories fragmented. The resulting factions posted reciprocal vigilante pseudolaw court decisions and notices that targeted each other.²³⁹ At least four successor groups resulted. Antonacci's United Sovran Nations was by far the most successful. In Billings Montana, former Montana Freeman²⁴⁰ Cecil DeLabio and Ted Shinneman operate a second vigilante pseudolaw court that also called itself the "Tacit Supreme In Law Court," the "the highest court ... on the earth."²⁴¹ Both DeLabio and Shinneman are "Sovran Stewards" named in the Camel's Eye Treaty. Little more is known about this Sovran Nations branch.

Blackshear also relocated to Calgary where she organized a "prosperity program," the "SUNKE Temple Trust,"²⁴² that combined US-type Sovereign Citizen pseudolaw concepts with claims that Blackshear is a divine person. Blackshear then attempted to enforce her sacred status by suing the Canadian government and Federal and Alberta Attorneys General in Federal Court, demanding an end to blasphemy against "Maitreya" Blackshear, "The Divine Holy Mother Of All In/Of Creation," and \$108 quadrillion in damages.²⁴³ Unsurprisingly, Blackshear's lawsuit was struck out as incomprehensible and hopeless. Blackshear was deported from Canada in 2013,²⁴⁴ but remains active on social media,²⁴⁵ and in 2019 appeared in a documentary alleging marijuana has religious characteristics.²⁴⁶

The final remaining Sovran Nations fragment is a one-person cult of personality centred around "klanmother karen-ann:zachyk luyck baron macdonald," or "(:k-a:m)."²⁴⁷ Despite her suggestive title, Macdonald operates in New-Age cultic and crank healthcare circles, is highly active in associated social media and conventions, and exhibits a full spectrum of improvisational millennialist cultic milieu beliefs. Macdonald is a former nurse turned tantric (sex) magic and colonic irrigation (large volume enema) specialist. Macdonald has engaged in an itinerant lifestyle, based from a number of motorhomes, relocating between what she identifies as sacred sites in British Columbia and Alberta, issuing pseudolaw "kammands" that assert her divine authority.²⁴⁸ Macdonald's group has a core follower base of, at most, a few dozen individuals.

²³⁹ These documents are no longer online or archived.

²⁴⁰ Catherine Wessinger, *How the Millennium Comes Violently: From Jonestown to Heaven's Gate* (New York: Seven Bridges Press, 2000); Steven E Shay, "Here Once the Embattled Farmers Stood": *The Rise and Fall of the Montana Freeman* (PhD dissertation, Washington State University, 2008) [unpublished], online: <www.dissertations.wsu.edu/Dissertations/Summer2008/S_Shay_072808.pdf>.

²⁴¹ Ed Kemmick, "Nondescript Office Is Home to 'Highest Court on Earth,'" *Last Best News* (17 September 2015), online: <montana-mint.com/lastbestnews/2015/09/nondescript-billings-office-houses-highest-court-on-earth/>.

²⁴² Online: *Internet Archive* <web.archive.org/web/20160308044936/http://sunketempletrust.com/>.

²⁴³ *Maitreya' Isis Maryjane Blackshear, the Divine Holy Mother of All In/Of Creation and All Isis Nation Estates v Her Majesty the Queen*, 2013 FC 590.

²⁴⁴ *AS (Re)*, 2014 ABPC 300 at paras 10–16.

²⁴⁵ Sunke Temple Trust, online: <www.facebook.com/Sunke-Temple-Trust-249002665123836>; Isis Maryjane Blackshear, online: <www.youtube.com/channel/UCu1ioz0JqHPgRYbc9eolPuw>.

²⁴⁶ "Kaneh Movie," online: <www.imdb.com/title/tt8405882/?ref=vp_vi_tt>.

²⁴⁷ Online: <www.facebook.com/karen.a.macdonald.1>; <www.facebook.com/Karen-ann-luyck-macdonald-1649443155333441/>; <www.facebook.com/ka.luyck.7/>; <www.youtube.com/channel/UcjGsFLvtw5Ytvn2rnst4naw>; *blogspot* <karenannmacdonald.blogspot.ca>; <twitter.com/klanmother13>.

²⁴⁸ "(:k-a:m white tribal bear klan regulus sirius star nation. proclamation official release: land & water reclamation" (16 December 2013), online: <www.mediafire.com/view/e5syk8jjk5hacj/MacDonald_-_BC_declaration.jpg/file>; "(:k-a:m white tribal spirit bear klan lyra star nations. proclamation of standing kammands, arrest warrant, foreclosure, title relinquishment & dissolution of the british throne & the holy see (sea) authority & trusts ab initio ad infinitum" (6 September 2014), online: <www.mediafire.com/file/efg6q7z5xo6e63f/MacDonald_-_manifesto.pdf/file>.

Unsurprisingly, government actors have ignored Macdonald's claims. The only identified litigation that involves Macdonald are divorce proceedings with her ex-husband lawyer.²⁴⁹

IV. CONCLUSION

This survey illustrates that, with isolated exceptions, the pseudolaw movements and leadership who operated from 1990 through to 2015 are no longer active. Social stresses resulting from the current COVID-19 pandemic have not led to a resurgence of activity by this population and its leaders.

With the Detaxers, that is not a surprise. The pandemic is not their fight. The exception, David Kevin Lindsay, always took a broader approach to alleged extraordinary pseudolegal rights. Income tax was just a part of his law-related interests.

With the Freemen and their second-wave descendants, the reasons for their inactivity are more complex. Freeman social media websites demonstrate that resistance to steps to manage COVID-19 is very much "their fight." One explanation is that the population of former Freemen are simply resisting in other ways, for example refusing vaccinations and participation in other disease management steps. The Freeman host population has a long-standing and well-developed affiliation with cultic milieu crank "medicine," such as herbal remedies, New Age mantras and crystals, and, of course, marijuana and marijuana-derived products.

What is certain is that ex-Freemen are not employing pseudolaw in court proceedings in relation to the "scamdemic." Have the Freemen "been cured" of pseudolaw? That seems extremely unlikely. The ex-Freeman population still frequently mention and debate pseudolaw in their in-group discussions and exchanges. The Strawman trap still mesmerizes these individuals.

Probably the best answer is, to steal a phrase from the Cthulhu Mythos, the Canadian Freemen are not dead but "dreaming."²⁵⁰ Their political and social perspectives have not changed, nor is it really imaginable that they would. Instead, those who flocked to Menard and the Freeman banner now wait for "when the stars [are] ready":²⁵¹ the arrival of a leader/prophet who has proven him or herself within the crucible of Canadian courts, and demonstrated he or she possesses the skeleton keys and cheat codes to unlock their selfish and criminal desires.²⁵²

²⁴⁹ *Kwok v MacDonald*, 1997 CanLII 11151 (SK KB); *MacDonald v Kwok* (1997), 159 Sask R 238 (QB).
²⁵⁰ "Ph'nglui mglw'nafh Cthulhu R'lyeh wgah'nagl fhtagn" - "In his house at R'lyeh dead Cthulhu waits dreaming": HP Lovecraft, "The Call of Cthulhu" (1928) 11:2 *Weird Tales* 159 at 166.

²⁵¹ *Ibid* at 169.

²⁵² This parallel is more substantial than superficial or whimsical. The cult Lovecraft describes in *The Call of Cthulhu* anticipates an age of untrammelled action and excess: "The time would be easy to know, for then mankind would have become as the Great Old Ones; free and wild and beyond good and evil, with laws and morals thrown aside and all men shouting and killing and revelling in joy": *ibid* at 170. That corresponds very well to the Freemen's desires: "do as I please," "take what I want," and revenge and violence inflicted on those who dare attempt to limit or restrain them.

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