

NEW HOSTS FOR AN OLD DISEASE: HISTORY OF THE ORGANIZED PSEUDOLEGAL COMMERCIAL ARGUMENT PHENOMENON IN CANADA – PART III

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United States-sourced false law concepts, “pseudolaw,” were the schematic backbone for a number of Canadian anti-authority and criminal populations that operated in 2000–2015. These “first wave” pseudolaw groups and their descendants are now dead or inactive.

A “second wave” of novel pseudolaw groups has since emerged, energized and catalyzed by economic stress and the COVID-19 pandemic. This article reviews Canadian second wave pseudolaw and its host populations, documents second-wave pseudolaw theories and activities, and examines their comparatively limited success. Finally, the potential of violence building off pseudolaw in Canada is investigated.

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I. INTRODUCTION

The previous articles in this series, Netolitzky, “History #1”¹ and Netolitzky, “History #2,”² reviewed the post-2000 nature and characteristics of pseudolaw, and the overall patterns of pseudolaw activity in Canada. Netolitzky, “History #2” specifically investigated whether social scientists are correct that pseudolaw expands during periods of social stress and crisis, including the 2018–2019 economic downturn, and 2020-present COVID-19 pandemic.³

Netolitzky, “History #2,” concluded the two dominant 2000–2010 Canadian pseudolaw movements, the “Detaxers” and “Freemen-on-the-Land,” continued their decline post-2015. The Detaxers are now dead. The Freemen-adherent population retains its political and criminal orientation, but has not re-engaged pseudolaw toward those objectives. Neither pseudolaw movement exhibited the predicted crisis-based amplification and expansion.⁴

A second wave of Canadian pseudolaw gurus and movements, which have little to no “parent to child” connection to earlier Canadian pseudolaw antecedents, has emerged post-2015.⁵ These second wave Canadian pseudolaw movements continue to apply the six core components of pseudolaw inherited from the United States Sovereign Citizen movement.⁶ As such, second wave Canadian pseudolaw continues the pattern that pseudolaw’s various forms, worldwide, are new branches off an established trunk, or side tunnels off the same conspiratorial rabbit hole.⁷

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

² Donald J Netolitzky, “The Dead Sleep Quiet: History of the Organized Pseudolegal Commercial Argument Phenomenon in Canada – Part II” (2022) 60:3 *Alta L Rev* 795 [Netolitzky, “History #2”].

³ *Ibid* at 795–98.

⁴ *Ibid* at 831.

⁵ A recent Organization for the Prevention of Violence report (Michele St-Amant, David Jones, Michael King & John McCoy, *Hate, Extremism and Terrorism in Alberta, Canada, and Beyond: The Shift from 2019 to 2022* (Edmonton: Organization for the Prevention of Violence, 2022) at II:20 – II:26), that comments in part on Alberta-based pseudolaw activity between 2019–2022, detects the second wave of Canadian pseudolaw, and an overall increase in Canadian pseudolaw activities. However, only two of the many new variations on pseudolaw reviewed in this article are identified, and, instead, this publication’s commentary, including quotes from law enforcement, blurs different and socially distinct expressions of pseudolaw. This limitation is a repeating issue in analysis on pseudolaw phenomena, and results from a failure to separate pseudolaw as a means to an end for extremist and dissident populations, and the political and social objectives of those populations: Donald J Netolitzky, “A Revolting Itch: Pseudolaw as a Social Adjuvant” (2021) 22:2 *Politics, Religion & Ideology* 164 at 187–88 [Netolitzky, “Itch”].

⁶ Netolitzky, “History #2,” *supra* note 2 at 798–806; Netolitzky, “Itch,” *ibid* at 168–70.

⁷ Netolitzky, “History #2,” *ibid* at 795–806; 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 symposium: “Sovereign Citizens in Canada,” 3 May 2018) [unpublished] at 6–8, online (pdf): <researchgate.net/publication/325053635_A_Pathogen_Astride_the_Minds_of_Men_The_Epidemiological_History_of_Pseudolaw> [Netolitzky, “Pathogen”].

What separates these new pseudolaw instances are characteristics distinct from earlier Canadian pseudolaw:

1. different pseudolaw theories and strategies in addition to the core six-part Sovereign Citizen pseudolaw components;
2. host populations with different and more diverse characteristics than pre-2010 Canadian pseudolaw adherents;
3. influence by non-Canadian sources; and
4. pseudolaw directed to different social stressors.

Another novel characteristic of some new Canadian pseudolaw gurus and groups is that, although certain of these instances of Canadian pseudolaw developed a substantial following, that has not translated into court proceedings and judgments. As will become apparent, that pattern is not because these new expressions of pseudolaw do not *reject* conventional Canadian law. They do. However, the *forum* for that competition of laws is not litigation oriented. For many of these pseudolaw movements, Canadian courts are simply irrelevant. These groups do not litigate to conduct their dispute of laws. They expect to achieve their objectives in other ways. This distinguishing characteristic means, different from Detaxers and Freeman-on-the-Land, much less case law documents post-2015 second wave pseudolaw systems.

Pseudolaw is always a risk factor, since, at its foundation, pseudolaw promises to transfer authority away from state actors and to its users.⁸ Unsurprisingly, the now (falsely) empowered dissident and marginal populations that use pseudolaw predictably become increasingly aggressive,⁹ engaging in abusive and harassing document-based schemes and litigation, commonly called “paper terrorism.”¹⁰ However, paper terrorism is not the full extent of the aggressive actions taken by some pseudolaw actors. Violence, too, is well-documented, particularly directed to law enforcement and court agents.¹¹

Canadian second wave pseudolaw has introduced an unusual, novel, and disturbing form of violence and aggression. Multiple new pseudolaw movements are engaged in vigilante activity, purporting to be valid authorities who discipline “outlaws,” with imaginary court

Christine M Sarteschi, “The Law Doesn’t Apply to Me: The Spread of the Sovereign Citizen Movement Around the World” (19 April 2022), online: *International Center for the Study of Violent Extremism* <icsve.org/this-law-doesnt-apply-to-me/>.

⁸ Netolitzky, “Itch,” *supra* note 5 at 170.

⁹ *Ibid* at 178–80.

¹⁰ Reviewed in Christine M Sarteschi, *Sovereign Citizens: A Psychological and Criminological Analysis* (Cham: Springer Nature Switzerland AG, 2020) at 47–54 [Sarteschi, *Sovereign Citizens*].

¹¹ *Ibid* at 31–42, 66–68; Christine M Sarteschi, “Sovereign Citizens: A Narrative Review with Implications of Violence Towards Law Enforcement” (2021) 60 *Aggression & Violent Behavior* 1 [Sarteschi, “Violence”]; Donald J Netolitzky, “Organized Pseudolegal Commercial Arguments [OPCA] in Canada: an Attack on the Legal System” (2016) 10 *JPPL* 137 at 156–71 [Netolitzky, “Attack”]; Florian Hartleb, *Lone Wolves: The New Terrorism of Right-Wing Single Actors* (Cham: Springer Nature Switzerland AG, 2020) [Hartleb, *Lone Wolves*]; Jan Rathje, “Driven by Conspiracies: The Justification of Violence Among ‘Reichsbürger’ and Other Conspiracy-Ideological Sovereignists in Contemporary Germany” (2022) 16:6 *Perspectives on Terrorism* 49 [Rathje, “Conspiracies”].

summons and proceedings, and false and spurious “peace officers,” and “citizens’ arrests.” This alarming escalation in illegal activity reappears repeatedly as a threat factor within modern Canadian pseudolaw communities.

II. METHODOLOGY AND IDENTIFICATION OF PSEUDOLAW ADHERENTS AND BELIEFS

Pseudolaw can be defined and identified in two ways. The first method is a rules-based approach. The pseudolaw that Canada inherited from the US Sovereign Citizen movement circa 2000 includes a number of specific, highly distinctive not-law core concepts.¹² These motifs usually co-present as a unit, since pseudolaw operates as a “memeplex”: a collection of mutually supporting concepts, ideas, and narratives.¹³ Pseudolaw’s core motifs are surrounded by a looser cloud of commonly encountered, but secondary “ornamental” characteristics. For example, pseudolaw’s users have unique rituals, such as strange ways to name and identify themselves, and documentary quirks, including attaching postage stamps to court filings.¹⁴ These core rules and unique ornaments operate as “fingerprints.” The stereotypic features of pseudolaw materials and concepts are very simple to recognize. Once you know what to look for, you know it when you see it.

Second, pseudolaw has a very specific and characteristic function: pseudolaw shifts authority from institutional, state, police, and court actors, toward individuals.¹⁵ This rebalancing — by law-based means — is a second distinctive feature of pseudolaw.

Netolitzky, “History #2” described the rich publicly accessible sources that permit investigators to monitor pseudolaw phenomena in Canada.¹⁶ The highly characteristic rules, ornaments, and purpose of pseudolaw means other atypical law-oriented strategies are readily distinguishable. However, accurate quantification of pseudolaw-related activity, such as the number of users, and the volume of their in-court and other activities, is much more difficult, and borders on impossible.¹⁷

This article identifies and reviews new Canadian pseudolaw populations and leaders. How are novel instances of pseudolaw identifiable? The traditional “law school” approach would be to search reported case law, but that methodology both misses much unreported court activity, and is slow, since published case authorities only capture past activity. Instead, a more productive strategy is to monitor a crowdsourced network of hobbyist observers, including internet message forums,¹⁸ subreddits,¹⁹ and blogs.²⁰

¹² Netolitzky, “History #2,” *supra* note 2 at 798–806; Netolitzky, “Itch,” *supra* note 5 at 168–70.

¹³ Netolitzky, “Itch,” *ibid* at 166, 170.

¹⁴ Donald J Netolitzky, “Organized Pseudolegal Commercial Arguments as Magic and Ceremony” (2018) 55:4 *Alta L Rev* 1045 at 1057–69 [Netolitzky, “Magic”]; *Meads v Meads*, 2012 ABQB 571 at paras 206–13 [*Meads*].

¹⁵ Netolitzky, “Itch,” *supra* note 5 at 170.

¹⁶ Netolitzky, “History #2,” *supra* note 2 at 806–13.

¹⁷ *Ibid*.

¹⁸ See e.g. “Q-Forum,” online: <www.quatloos.com/Q-Forum/index.php>.

¹⁹ See e.g. “r/amibeingdetained,” online: <[reddit.com/r/amibeingdetained/](https://www.reddit.com/r/amibeingdetained/)>.

²⁰ See e.g. Sovereign Citizen Watcher, online (blog): <sovereigncitizenwatch.com>; Rob Sudy, “FREEMAN DELUSION: The Organized Pseudolegal Commercial Argument in Australia,” online: <freemandelusion.com>.

The author, personally, also has direct opportunities to identify emergent pseudolaw groups, personalities, and concepts. Much problematic and abusive litigation and litigant activity, including pseudolaw adherents and their lawsuits, is directed to the author as a result of his position as the Alberta Court of King's Bench Complex Litigant Management Counsel. That includes pseudolaw document triage procedures,²¹ and show-cause processes²² to terminate abusive litigation. In short, any pseudolegal phenomena in Alberta that ends up before the Court will probably be detected and examined.

A second, and very unusual institutional advantage, flows from pseudolaw adherents' widespread belief that positive steps are necessary to reject state and court authority. These "opting out" claims typically are one or more documents directed to politicians, government actors, law enforcement, or courts and court decision-makers. Associate Chief Justice Rooke, who released the noted (or notorious) *Meads*²³ decision, appears to be perceived in pseudolaw circles as a critical personality and authority, and, as a consequence, he is copied and receives many more opting-out documents than any other Justice of the Court. That includes pseudolaw adherents from all across Canada, and, occasionally, internationally as well.

Courts are very often the state organ where first contact occurs with pseudolaw. These institutions are, therefore, very well positioned to act as "watchtowers," to observe and identify what is stirring along the frontier between law and not-law. A significant part of the data that follows was obtained in that exact way.

III. ALTERNATIVE/REPLACEMENT GOVERNMENTS

All pseudolaw schemes require some narrative that invalidates or minimizes state authority.²⁴ That explanation then sets the stage for the hidden, true (pseudo)law, and explains why that hidden law is claimed to be superior. One defective or limited state authority pseudolegal archetype is that true and superior authority rests with a separate, different state apparatus or government: an *alternative/replacement* state authority. While a well-established tradition in certain jurisdictions,²⁵ until recently this defective or limited state authority variation was unknown in Canada.

For example, the Sovereign Citizen Republic of Texas has, since the 1990s, claimed to be the true successor to the historical independent nation-state of Texas that existed between 1836–1845.²⁶ The modern Republic of Texas operates as a duplicate shadow government, with elected officials, an assembly that passes laws, and "County Chief Justices." The

²¹ *Babb v Parrish & Heimbecker Limited*, 2019 ABQB 687, court access restrictions imposed 2019 ABQB 831 [*Babb*].

²² *Unrau v National Dental Examining Board*, 2018 ABQB 874; *Ubah v Canadian Natural Resources Limited*, 2019 ABQB 347.

²³ *Meads*, *supra* note 14.

²⁴ Netolitzky, "Itch," *supra* note 5 at 168; Donald J Netolitzky, "A Rebellion of Furious Paper: Pseudolaw as a Revolutionary Legal System" (Paper delivered at the Centre d'expertise et de formation sur les intégrismes religieux et la radicalisation symposium: "Sovereign Citizens in Canada," 3 May 2018) [unpublished] at 14–15, online (pdf): <researchgate.net/publication/325053364_A_Rebellion_of_Furious_Paper_Pseudolaw_as_a_Revolutionary_Legal_System> [Netolitzky, "Rebellion"].

²⁵ Netolitzky, "Itch," *ibid* at 172–73; Harry Hobbs & George Williams, *Micronations and the Search for Sovereignty* (Cambridge: Cambridge University Press, 2022).

²⁶ Netolitzky, "Itch," *ibid* at 172.

“Republic for the United States of America” is another historically less plausible US replacement government.²⁷

Similarly, in Germany and Austria, multiple alternative “Reichsbürger” governments claim to be the “real Germany,” or that true state authority vests with a pre-unification precursor.²⁸ The Reichsbürgers from the 1980s onward developed a sophisticated array of theories for why the Federal Republic of Germany is defective, and then in the 2000s expanded off that foundation with imported US Sovereign Citizen pseudolaw concepts.²⁹ More recently this pattern has emerged in Russia, where the de jure government purportedly is the USSR,³⁰ and Poland, where the 1939 government in exile proclaims itself as the true nation-state.³¹

A. NEW CONSTITUTIONALISTS

The New Constitutionals (a name assigned by the author) are the dominant Canadian alternative/replacement government pseudolaw movement. New Constitutionalist theories have an unusual deep historical basis.

1. CANADA IS A MYTH

Post-2015, certain pseudolaw activists argued Canada simply does not exist because, in 1931, the United Kingdom *Statute of Westminster*³² was in some manner defective. The *Statute of Westminster* shifted authority from the UK to certain Commonwealth Dominions, including Australia, Canada, Newfoundland, and New Zealand. New Constitutionalist theorists claim something different occurred in 1931, and, as a consequence:

1. the colonies that had been joined into the Dominion of Canada in 1867 by the *British North America Act*³³ were now free-standing nation-states no longer subject to any UK supervision; and

²⁷ Jean Hallahan Hertler with David Carl Hertler, *Re-Inhabited: Republic for the United States of America: Volume 1: America's Truthful History* (Heritage Endeavors, 2016); Jean Hallahan Hertler with David Carl Hertler, *Re-Inhabited: Republic for the United States of America: Volume 2: The Story of the Re-Inhabitation* (Heritage Endeavors, 2016); “About the Republic,” online: *Republic for the United States of America* <dev.republicoftheunitedstates.org>.

²⁸ Jan Rathje, *Die “Reichsbürger”: Überzeugungen, Gefahren und Handlungsstrategien* (Berlin: Amadeu Antonio Stiftung, 2014); Christa Caspar & Neihard Neubauer, “Durchs wilde Absurdistan — oder: Wie ‘Reichsbürger’ den Fortbestand des Deutschen Reiches beweisen wollen” (2012) 12:22 *Landes und Kommunalverwaltung* 529; Dirk Wilking, *Reichsbürger: Ein Handbuch* (Potsdam: Brandenburgische Universitätsdruckerei und Verlagsgesellschaft Potsdam mbH, 2015); Karoline Marko, “‘The Rulebook - Our Constitution’: A Study of the ‘Austrian Commonwealth’s’ Language Use and Creation of Identity Through Ideological In- and Out-Group Presentation and Legitimation” (2020) 18:5 *Critical Discourse Studies* 565; Hartleb, *Lone Wolves*, *supra* note 11 at 138–41; Florian Buchmayr, “Denying the Geopolitical Reality: The Case of the German ‘Reich Citizens’” in Andreas Önnersfors & André Krouwel, eds, *Europe: Continent of Conspiracies* (Oxon: Routledge, 2021) 97 at 97.

²⁹ Netolitzky, “Rebellion,” *supra* note 24 at 14–15.

³⁰ Matthew Luxmoore, “Flouting the Law in Nostalgia’s Name: Russia’s Growing Movement of ‘Soviet Citizens,’” *RadioFreeEurope RadioLiberty* (25 May 2019), online: <rferl.org/a/flouting-law-in-nostalgia-s-name-russia-s-growing-movement-of-soviet-citizens/29962523.html>.

³¹ The Second Republic of Poland, online: *II Rzeczpospolita Polska* <www.2rp.info>.

³² *Statute of Westminster 1931* (UK), 22 & 23 Geo V, c 4.

³³ *British North America Act 1867* (UK), 30 & 31 Vict, c 3.

2. Canada, which was a political and governmental entity between 1867–1931, ceased to exist.

The purported result is that Canadian provinces are, instead, independent countries. These republics have slumbered since 1931, awaiting the formation of new national constitutions, governments, courts, and other related institutions that would give these republics full operational effect.

This theory, that “Canada is not a real country,” dates to the 1930–1940s, and was invented and promoted by Social Credit politicians R. Rogers Smith³⁴ and Walter F. Kuhl.³⁵ Each published pamphlets that explained this claim. At that time, the “no Canada” concept did not attract significant attention or support. In 1998 these two pamphlets were reprinted by anti-Semitic publisher Ron Gostick in a text titled *The Missing Key to Canada's Future*.³⁶ Some Detaxers argued “no Canada” claims to reject federal income tax obligations: there was no federal government authorized to impose tax. Unsurprisingly, “no Canada” claims were consistently unsuccessful.³⁷ The most detailed rebuttal, by Justice Bennett in *Butterfield*, concluded the Smith/Kuhl theory had multiple errors, but, ultimately, any deficiencies in the *Statute of Westminster* were irrelevant after the Canadian Constitution’s repatriation in 1982.³⁸ Canada is a real country.

By this point US Sovereign Citizen concepts were circulating in Canada after their introduction by Eldon Warman circa 2000.³⁹ Pre-existing Canada-specific pseudolaw, including the Smith/Kuhl “no Canada” theory, was displaced and became all but extinct.

2. OLD WINE REBOTTLED

Circa 2017, several old guard survivors of the Freeman movement resurrected the Smith/Kuhl theories, initially promising that a documentary film, “The Myth is Canada,” would reveal the truth: Canada does not exist.⁴⁰ Whether that documentary was ever actually produced is unclear, but “The Myth is Canada” group also sold tutorial DVDs and other paraphernalia.⁴¹ The revived “no Canada” claims did not result in reported litigation,⁴² but these ideas in 2018–2019 entered into the Canadian Yellow Vest community, as a mechanism that promised release from (perceived) oppressive federal government authority.

³⁴ R Rogers Smith, “Alberta has the Sovereign Right to Issue and Use its Own Credit: A Factual Examination of the Constitutional Problem” (1937), online: <www.aberhartfoundation.ca/PDF%20Documents/Premier%20PDF%27s/Alberta%20Has%20A%20Sovereign%20Right.pdf>.

³⁵ Walter F Kuhl, “Canada a Country Without a Constitution: A Factual Examination of the Constitutional Problem” (1977), online: <www.aberhartfoundation.ca/PDF%20Documents/Premier%20PDF%27s/Social%20Credit%20of%20Canada%20Docs/CanWithoutConst_Kuhl1977.pdf>.

³⁶ Third Option for National Unity Committee, *The Missing Key to Canada's Future* (Flesherton: Canadian Intelligence Publications, 1998).

³⁷ See e.g. *Butterfield v LeBlanc*, 2007 BCSC 235 at paras 21–25 [*Butterfield*]; *R v Dick*, 2001 BCPC 245 at para 72; *R v Dick*, 2001 BCPC 275 at paras 29–41; *R v Lindsay*, 2004 MBCA 147 at para 32; *R v JBC Securities Ltd*, 2003 NBCA 53 at para 4.

³⁸ *Butterfield*, *ibid* at para 25.

³⁹ Netolitzky, “Pathogen,” *supra* note 7 at 6–8.

⁴⁰ “Nephalem Films,” online: *Internet Archive* <web.archive.org/web/20200128183020/http://nephalemfilms.com/>.

⁴¹ Online: *Internet Archive* <web.archive.org/web/20200504222140/www.themythiscanada.com/swag/>.

⁴² The unreported *Feroulie v Federal Government of Canada C/O Justin Trudeau*, Calgary T-342-20 (FC) proceeding advanced New Constitutionalist concepts, but was struck out at a preliminary stage (15 July 2020).

What followed were attempts to self-organize “start-up nations” for the individual province “nation-states” falsely grouped as Canada. These activists did not use consistent language to self-identify, besides that they were “Sovereign” and “We The People,” and that “Canada is a myth,” or “Canada is not a real country.” This article groups persons engaged in the new nation-state start-up governments as “New Constitutionalists.”

New Constitutionalist materials and activities ultimately concentrated within the *Unify The People* website,⁴³ and the affiliated “We The People Constitutional Conventions” Facebook groups⁴⁴ and YouTube channels.⁴⁵ New Constitutionalists developed and drafted constitutional documents, met to coordinate online and in-person activities, and otherwise discussed perceived government excess, misconduct, and nefarious alliances.

New Constitutionalism’s objective is a populist revolution. New Constitutionalists claim that workers and businesses are treated unfairly and should be left alone. New Constitutionalists seek to shift authority from government to individuals, or, more precisely, to alternative/replacement government structures that New Constitutionalists claim are authorized by, and follow objectives of, “We The People.” Conventional governments, both provincial and federal, instead allegedly act on behalf of international, conspiratorial, and institutional “hidden hands.” The current federal Liberal government is denounced as an oppressive regime that exerts illegal authority over the common man. Prime Minister Justin Trudeau is identified, personally, as an enemy agent.

The New Constitutionalists’ strategic perspective thus aligned with Yellow Vest political objectives. A further New Constitutionalist population expansion occurred in 2020–2021 when New Constitutionalist concepts entered into COVID-19 pandemic and anti-vaccine “scamdemic” resister circles.

New Constitutionalist draft constitutions exhibit diverse domestic, foreign (particularly US), and conspiratorial influences. However, many of these documents’ rules and objectives are unremarkable: for example, recognizing (or imposing) rights to religious freedom, freedom of speech and assembly, and prohibiting discrimination. Some “Constitution of the Sovereign Republic of Alberta”⁴⁶ clauses mimic US, rather than traditional Canadian, concepts. For example, the draft Republic of Alberta Constitution includes: (1) broader rights to weapons, self-defence, and legal lethal force; (2) law enforcement by elected County Sheriffs; (3) a US-style grand jury system; and (4) enhanced compensation for state seizures and expropriation.

Alberta’s Constitution is not, however, a strictly libertarian document. The draft Constitution outlaws income tax, but also mandates nationalization of Alberta’s utilities and transportation infrastructure. Tensions between provincial and federal authority are also apparent. The Republic of Alberta rejects Commonwealth membership, rejects application

⁴³ “Unify the People,” online: *Internet Archive* <web.archive.org/web/20220202174310/https://unifytheperson.ca/>. Online: <constitutionalconventions.ca/category/all-constitutions> is a possible successor.

⁴⁴ Online: <facebook.com/groups/373652496802161/>.

⁴⁵ “Canada United We Stand,” online: *Internet Archive* <web.archive.org/web/20190416123946/https://www.youtube.com/channel/UC_kvnUusdDPeJgByvgkEFAA>.

⁴⁶ “Constitution of the Sovereign Republic of Alberta Draft,” online: *Internet Archive* <web.archive.org/web/20220121192929/unifytheperson.ca/alberta-constitution-draft>.

of Canadian international treaties and trade arrangements, rejects any responsibility for federal debts, imposes strict limits on immigration and residency, and vests mineral resources with individual Albertans.

Other provisions betray improvisational millennialist influences, and commonplace US conservative “right-wing,” “alt-right,” and QAnon concerns, conspiracy theories, and objectives:

1. strict monitoring and sanctions against “controlled media” and “controlled propaganda”;
 2. certain groups and ideologies, including the Illuminati, Freemasons, Knights Templar, Muslim Brotherhood, “Islam and Sharia Law,” and unions, are outlawed; and
 3. purportedly disease-causing 5G wireless telecommunications networks are prohibited.
3. LEADER AND ADHERENT CHARACTERISTICS

New Constitutionalists are very different from prior Canadian pseudolaw populations. New Constitutionalists are socially conservative and more closely resemble US Sovereign Citizen communities than 2000–2015 Canadian pseudolaw adherents. Pseudolaw was observed in conservative Canadian communities in the 1990s, but was restricted to a small, strongly racist rural population.⁴⁷

The New Constitutionalist rank and file appear unfamiliar with pseudolaw concepts and conspiracy theories, but many of the movement’s core right-wing personalities, including Dallas Hills,⁴⁸ Duke Willis,⁴⁹ and Cody Haller,⁵⁰ have a longer record with these ideas, “know the lingo,” and in videos, meetings, and roundtables can appear to newer adherents to be well-informed and knowledgeable.

Unlike the peak of Freeman activity circa 2010, online cultic milieu sources now provide vastly more pseudolaw information and materials at no cost. The “cultic milieu” is a social sciences term to identify a loosely cross-linked assemblage of discarded and rejected knowledge, a kind of collective garbage heap of thought and belief.⁵¹ The rich modern ecosystem of fringe cultic milieu materials supports New Constitutionalist perspectives; these adherents see themselves within a much broader phenomenon. There are many fellow travelers just like them. That is, factually, correct. New Constitutionalist beliefs and perspectives often mirror US alt-right phenomena, and its Sovereign Citizen, Militia, and conspiratorial and reactionary components. Populist US alt-right rhetoric creates a broader foundation of “friendly” resources and media sources.

⁴⁷ Netolitzky, “History #1,” *supra* note 1 at 613–16.

⁴⁸ Online (blog): <historylessonsdeleted.blogspot.com>.

⁴⁹ Duke Willis, “On the Patio with Duke Willis,” online: <facebook.com/DukesRant/>.

⁵⁰ Cody Haller, online: <facebook.com/cody.haller.79>.

⁵¹ Colin Campbell, “The Cult, the Cultic Milieu and Secularization” in Michael Hill, ed, *A Sociological Yearbook of Religion in Britain 5* (London: SCM Press, 1972) 119 at 119.

4. PUBLIC ACTIVITY

While New Constitutionalist activity occurs online, centred around their leadership personalities, New Constitutionalist are unique in Canadian pseudolaw circles for their public demonstrations and rallies. New Constitutionalist leaders are public speakers, directly confront authorities,⁵² and have engaged in extended occupation-type protests.⁵³

New Constitutionalist pseudolaw is most commonly encountered during anti-“scamdemic” marches and protests. Placards and banners at these events are diverse and often homemade. Recordings of these activities frequently include signage that references New Constitutionalist concepts, links to the Unify The People website, demands for new constitutional processes, and proclamations that “Canada is not a real country.”⁵⁴ That extends to decorated vehicles, a phenomenon usually associated with US right-wing movements.⁵⁵ The pseudolaw cues displayed during these events might not be obvious to outside observers, but their meaning to fellow adherents is clear.

To date, public New Constitutionalist activities have not escalated to property damage or violence, nor would that be consistent with the “lawful revolutionary” framework of New Constitutionalist action. However, hostile response to counter-protests is plausible. Whether counter-protestors would realize what New Constitutionalist are attempting to communicate is, however, unclear.

5. FUTURE AND POTENTIAL CONSEQUENCES

The New Constitutionalist are unprecedented in Canada, since:

1. the New Constitutionalist are the first broadly-disseminated pseudolaw-based alternative/replacement government scheme; and
2. arguably, New Constitutionalist not only challenge conventional authority, but threaten insurgent action as a replacement government that seeks power via “a revolution from below.”

That said, the latter risk is probably more hypothetical than real. New Constitutionalist’s host dissident populations, initially the Yellow Vest movement, and now expanding into

⁵² See e.g. CTV News Edmonton Staff, “Man Arrested, Dragged out of Alberta Legislature During Protest,” *CTV News* (11 May 2020), online: <edmonton.ctvnews.ca/man-arrested-dragged-out-of-alberta-legislature-during-protest-1.4934675>.

⁵³ See e.g. “Man Trying to Arrest MPs Part of Months-Long ‘Revolution’ Encampment” (28 September 2020), online (blog): *Canadian Anti-Hate Network* <antihate.ca/mps_citizens_arrest>; “The Canadian Revolution,” online: <facebook.com/TheCanRev/>.

⁵⁴ See e.g. protestors in these images: Sarah Rieger, “Calgary Hospitals Cancel Surgeries for 2nd Week as Protesters Outside Demand Right to Be Unvaccinated,” *CBC* (13 September 2021), online: <www.cbc.ca/news/canada/calgary/calgary-cancels-surgeries-1.6174532>; Christa Dao, “Some Levity From Earlier” (5 December 2020 at 14:24), online: <twitter.com/ChristaDao/status/1335334285859950597>; Efrain Flores Monsanto, “The Anti-Lockdown March Ends at Queens Park and They Begin to Sing O’Canada #Toronto” (16 January 2021 at 12:43), online: <twitter.com/realmonsanto/status/1350529011403939840>.

⁵⁵ Online: <i.imgur.com/tjIPoVH.jpg>; <pbs.twimg.com/media/EQDJ_p8WAAASnVl?format=jpg&name=large>.

“scamdemic” activist communities, are less a right-wing extremist phenomenon, than conservative reactionaries. Justin Everett Cobain Tetrault’s recent investigation of Yellow Vest adherents concluded these groups instead “fetishize law and order,” rather than seek to overthrow social structures or engage in vigilante activity.⁵⁶ Viewed from that perspective, the appeal of New Constitutionalism is less the imagined revolution, than the (spurious) legitimacy promised by claims of dramatic change with a lawful basis.

Put simply, New Constitutionalism’s appeal then is not tearing down the old order, but rather promoting a rebirth of *legitimate* government on a populist basis. That parallels the “nostalgic” and “counter-memory” appeal identified by Ruth Braunstein and Amy Cooter,⁵⁷ and Edwin Hodge,⁵⁸ in US Sovereign Citizen circles, radically different from the selfish individualism, criminality, and lawlessness that characterized Freemanism.

New Constitutionalism will probably soon fade. There is little chance the various New Constitutionalist republics will mature into some kind of viable authority given how little has been accomplished post-2017. That said, if New Constitutionalism does persist, then these “We The People” doppel-nations could pose a significant vigilante authority risk, such as has emerged in the US, but, more particularly, in Germany with its Reichsbürger alternative governments and authorities,⁵⁹ that recently have led to large-scale security operations.⁶⁰

B. QUEEN ROMANA DIDULO

Aside from occasional news reports that describe unfavourable court outcomes, in Canada pseudolaw phenomena are typically all but invisible. However, in 2022, the bizarre public persona and claims of Romana Didulo, an apparently otherwise unremarkable middle-aged British Columbia Filipino woman, attracted significant international media attention⁶¹ and academic commentary.⁶² Didulo has declared herself Queen of Canada,⁶³ and, unexpectedly,

⁵⁶ Justin Everett Cobain Tetrault, “Thinking Beyond Extremism: A Critique of Counterterrorism Research on Right-Wing Nationalist and Far-Right Social Movements” (2022) 62:2 *Brit J Crim* 431 at 432.

⁵⁷ Ruth Braunstein, “The ‘Right’ History: Religion, Race, and Nostalgic Stories of Christian America” (2021) 12 *Religions* 95; 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) 326:1 *Scientific American*, online: *Scientific American* <www.scientificamerican.com/article/citizen-militias-in-the-u-s-are-moving-toward-more-violent-extremism/>.

⁵⁸ Edwin Hodge, “The Sovereign Ascendant: The Violent Collapse, Status Anxiety, and the Rebirth of the Sovereign Citizen Movement” (2019) 4 *Frontiers in Sociology* 1.

⁵⁹ See Netolitzky, “History #2,” *supra* note 2 at 798–806.

⁶⁰ Paul Kirby, “Germany Arrests 25 Accused of Plotting Coup,” *BBC* (7 December 2022), online: <www.bbc.com/news/world-europe-63885028>.

⁶¹ See e.g. Anders Anglesey, “QAnon Influencer Romana Didulo Detained Over Alleged ‘Shoot To Kill’ Medics Posts,” *Newsweek* (2 December 2021), online: <newsweek.com/qanon-influencer-romana-didulo-detained-over-alleged-shoot-kill-medics-posts-1655320> [Anglesey, “Shoot”]; Anders Anglesey, “QAnon ‘Queen of Canada’ Orders Followers to Arrest Police Officers,” *Newsweek* (12 August 2022), online: <newsweek.com/qanon-queen-canada-orders-followers-arrest-ontario-police-officers-1733084> [Anglesey, “Arrest”]; “The Misrule of Canada’s QAnon Queen,” *BBC* (20 August 2022), online: <bbc.co.uk/sounds/play/w3ct43d9>; Leyland Cecco, “‘Queen of Canada’: The Rapid Rise of a Fringe QAnon Figure Sounds Alarm,” *The Guardian* (23 August 2022), online: <theguardian.com/world/2022/aug/23/queen-of-canada-qanon-rise-conspiracy-alarm>.

⁶² Christine Sarteschi, “How the Self-Proclaimed ‘Queen of Canada’ is Causing True Harm to Her Subjects” (22 June 2022), online: <theconversation.com/how-the-self-proclaimed-queen-of-canada-is-causing-true-harm-to-her-subjects-185125> [Sarteschi, “Self-Proclaimed Queen”]; Christine Sarteschi, “How the ‘Queen of Canada’ Is Making Inroads Into the U.S., Australia and Beyond” (28 August 2022), online: <theconversation.com/how-the-queen-of-canada-is-making-inroads-into-the-u-s-australia-and-

developed a significant and apparently dedicated following. While alternative or replacement government schemes usually build from a tenuous foundation, the outlandish claims made by Didulo are unusual, even within pseudolaw circles.

Succinctly, in 2021, Didulo unilaterally announced she is the “Head of State, Commander-in-Chief, Head of Government of Canada, President and Queen of the Kingdom of Canada.”⁶⁴ Queen Didulo’s subsequent Royal Decrees,⁶⁵ and other announcements of her will, have diverse subjects, ranging from raising the age of sexual consent to 24, unilaterally adding Russia to NATO, and many “scamdemic”-related orders, such as outlawing ventilators, and execution of Canadian military leaders, public health officials, and others involved in COVID-19 vaccination programs.⁶⁶

Didulo’s initial activity was online. “HRH Queen Lady Romana Didulo’s” first public action was a 28 May 2021 “Re: Cease and Desist Order,”⁶⁷ directed to Canadian politicians, health officials, police, and medical personnel, that demanded immediate termination of COVID-19 pandemic management and treatment steps. Didulo’s “Order” also states “Joseph (Joe) Biden is not President of US, and the US Armed Forces has been in control since January 14, 2021,” and that the US military has confirmed Queen Didulo’s authority as “Head of State and Commander-in-Chief, Head of Government of Canada, and Queen of Canada.”⁶⁸ This “Order” was broadly distributed to government, court, and private targets across Canada by Didulo’s followers.⁶⁹

Didulo primarily communicates with her 60,000–70,000 Telegram internet application followers via text messages, photos, and videos. Didulo usually posts multiple statements daily that continue her pattern of claims, instructions, demands, and threats.⁷⁰ In addition to her claim to unique authority via “Natural Law,” Didulo has deployed classic pseudolaw motifs.⁷¹ Didulo instructs her followers to use “promissory notes” to obtain “money for

beyond-189359> [Sarteschi, “Inroads”]. Sarteschi, a behavioural scientist and expert in the US Sovereign Citizen movement, has also published a comprehensive examination and evaluation of Didulo’s history and activities: Christine Sarteschi, “The Social Phenomenon of Romana Didulo: ‘Queen of Canada’” (2023) Intl J Coercion, Abuse & Manipulation [Sarteschi, “Social Phenomenon”].

⁶³ Online: *HRH Queen Romana Didulo* <queenromanadidulo.ca>; online: <www.thekingdomofcanada.ca>.

⁶⁴ *Ibid.*

⁶⁵ Online: *HRH Queen Romana Didulo* <queenromanadidulo.ca/video-gallery/>; online: *HRH Queen Romana Didulo* <queenromanadidulo.ca/royal-decrees/>; “Queen Romana’s Official Royal Decrees,” online: <www.thekingdomofcanada.ca/royal-decrees>.

⁶⁶ Mack Lamoureux, “QAnons Are Harassing People at the Whim of a Woman They Say Is Canada’s Queen,” *Vice* (17 June 2021), online: <vice.com/en/article/3aqvkw/qanons-are-harassing-people-at-the-whim-of-a-woman-they-say-is-canadas-queen-romana-didulo> [Lamoureux, “Harassing”]; Mack Lamoureux, “QAnon’s Queen of Canada is Raising Serious Cash on GoFundMe,” *Vice* (28 July 2021), online: <vice.com/en/article/y3dxy7/qanons-queen-of-canada-is-raising-serious-cash-on-go-fundme> [Lamoureux, “Cash”]; Peter Smith, “‘Lead in the Head’: Self-Declared Canadian Prime Minister and QAnon Adherent Calls for Executions of Officials Who Refuse Her Cease and Desists” (17 June 2021), online (blog): *Canadian Anti-Hate Network* <antihate.ca/lead_in_the_head_self_declared_canadian_prime_minister_and_qanon_adherent_calls_for_executions_of_officials> [Smith, “Lead”]. Online: <reddit.com/gallery/qccc4f> [“Re: Cease”].

⁶⁷ *Ibid.*

⁶⁸ Lamoureux, “Harassing,” *supra* note 66; Smith, “Lead,” *supra* note 66.

⁶⁹ A web-accessible record is located at “HRH Queen Lady Romana Didulo,” online: <t.me/s/romana-didulo>.

⁷⁰ “Re: Cease,” *supra* note 67.

⁷¹

nothing.”⁷² The template promissory note provided by Didulo⁷³ is purportedly secured by the One People’s Public Trust, a US pseudolaw movement that collapsed in 2013.⁷⁴ Didulo has also referenced “fiat currency,” the idea paper money has no value, and “National Economic Security and Recovery Act” (NESARA),⁷⁵ a monetary/financial conspiracy theory widely distributed in the pseudolaw cultic milieu.⁷⁶ A recent British Columbia foreclosure proceeding, where NESARA was rejected, is plausibly linked to Didulo and her instructions.⁷⁷

Prior to her self-elevation to royalty, Didulo engaged in a somewhat more conventional political process, announcing the “Canada1st” political party in late 2020. The available record of the Canada1st party is an incomplete website⁷⁸ and a collection of YouTube videos.⁷⁹ Didulo is the party leader and its chief, if not only, personality. To the degree Canada1st’s policies are documented, its platform is conservative, reactionary, and isolationist, and employs right-wing conspiratorial US political rhetoric and concepts.

Didulo’s public status unexpectedly ballooned when the US QAnon conspiracy movement concluded that Didulo’s monarchy was supported and endorsed by Donald Trump.⁸⁰ The conspiratorial and alternative reality narrative adopted by Didulo and her followers incorporates widely disseminated QAnon theories concerning the COVID-19 pandemic, concealed and malevolent activity by public, media, and entertainment elites worldwide, a “White Hat” government resistance led by Donald Trump, and improvisational millenarian eschatological claims.⁸¹ Didulo sometimes puts a Canadian spin on QAnon motifs, such as alleging graves at former residential schools are evidence children were killed to harvest adrenochrome.⁸²

Friction with state actors started on 27 November 2021, when Didulo was detained for psychiatric examination in response to her command that “duck hunters” kill those involved in COVID-19 vaccination programs.⁸³ Didulo was subsequently released without charges.

⁷² Reviewed in Donald J Netolitzky, “After the Hammer: Six Years of *Meads v. Meads*” (2019) 56:4 Alta L Rev 1167 at 1178–81 [Netolitzky, “Hammer”]; *Re Boisjoli*, 2015 ABQB 629 at paras 30–35, 38.

⁷³ Online: <pbs.twimg.com/media/FSewetzXsAARrXR?format=jpg&name=medium>.

⁷⁴ Reviewed in Samuel Barrows, “Sovereigns, Freeman, and Desperate Souls: Towards a Rigorous Understanding of Pseudoligation Tactics in US Courts” (2021) 62:3 Boston College L Rev 905.

⁷⁵ Aaron John Gulyas, *Conspiracy and Triumph: Theories of a Victorious Future for the Faithful* (Jefferson: McFarland & Company, 2021) at 33–79.

⁷⁶ Operation Q, “Introducing Queen Romana Didulo: Head of State & Commander-In-Chief of the Kingdom of Canada” (4 June 2021), online (blog): <humorousmathematics.com/post/introducing-romana-didulo-head-of-state-commander-in-chief-of-the-sovereign-republic-of-canada>.

⁷⁷ *Bank of Montreal v Lew*, 2022 BCSC 1320.

⁷⁸ Online: <canada1stpartyofcanada.ca>.

⁷⁹ “Canada 1st Party of Canada,” online: <youtube.com/channel/UCv4rqL6TK9VTt2-DT RiRHXg>; “The Official Kingdom of Canada Channel,” online: <youtube.com/channel/UCOC8qV46UxS-ha513c8m4Fw/>.

⁸⁰ Smith, “Lead,” *supra* note 66; Lamoureux, “Harassing,” *supra* note 66.

⁸¹ Smith, “Lead,” *ibid*; Lamoureux, “Harassing,” *ibid*; Lamoureux, “Cash,” *supra* note 66.

⁸² Lamoureux, “Harassing,” *ibid*.

⁸³ Mack Lamoureux, “QAnon’s ‘Queen of Canada’ Calls for Followers to ‘Kill’ People Vaccinating Children,” *Vice* (25 November 2021), online: <vice.com/en/article/v7ddgm/qanons-queen-of-canada-calls-for-followers-to-kill-people-vaccinating-children> [Lamoureux, “Calls”]; Anglesey, “Shoot,” *supra* note 61; Daphne Bramham, “The Absurd and Disturbing Tragedy of Romana Didulo,” *Vancouver Sun* (9 December 2021), online: <vancouver.sun.com/news/daphne-bramham-the-absurd-and-disturbing-tragedy-of-romana-didulo>.

Didulo has now adopted an itinerant lifestyle, travelling across the full length of Canada in several motorhomes with a small group of uniformed facilitators, holding public-meet-and-greets with followers,⁸⁴ while recording fanciful videos that proclaim Didulo's unique status. Didulo's claims have grown increasingly flamboyant: Didulo is now Queen of the World; Didulo led a war to clear Chinese military forces from underground tunnels below Canada; Didulo is an "Arcturian" extraterrestrial who can shape-shift and make herself invisible; and Didulo has access to extraordinary medical technologies such as "med beds" that reverse aging and regrow limbs.⁸⁵ Didulo places herself as part, or the lead, of an international network of other unorthodox monarchs and government agencies.⁸⁶ Didulo's inner circle report financial demands, harsh and abusive conditions, death threats, and being subjected to hours of repeated continued play of the Boney M song "Rasputin."⁸⁷

A conflict of realities is developing within Didulo's community. Her followers report they cannot enforce Didulo's decrees that income tax is illegal, bank loans do not exist, and utilities are free; that has had negative consequences.⁸⁸ Recently law enforcement temporarily seized Didulo's convoy.⁸⁹ However, the most dramatic escalation occurred on 13 August 2022. Didulo had been ordering her followers to arrest oppressive, evil, and illegitimate government and law enforcement actors.⁹⁰ A group of about 30 of Didulo's followers then appeared at the Peterborough police station, and attempted to force entry to conduct "citizens' arrests" of law enforcement who would, purportedly, then be handed to Didulo's military allies for discipline and punishment.⁹¹ Several of Didulo's followers were arrested. Didulo was present, but observed from an RV guarded by Didulo's uniformed inner cadre. Criminal proceedings are now underway against several of Didulo's followers as a consequence of the Peterborough event.⁹²

⁸⁴ Mack Lamoureux, "QAnon Queen of Canada Now Claims to Be Queen of the World," *Vice* (2 June 2022), online: <[vice.com/en/article/n7n8aw/queen-of-canada-roman-didulo-qanon-global](https://www.vice.com/en/article/n7n8aw/queen-of-canada-roman-didulo-qanon-global)>; Mack Lamoureux, "Inside the QAnon Queen's Cult: 'The Abuse Was Non-Stop,'" *Vice* (23 August 2022), online: <[vice.com/en/article/n7ze5w/qanon-queen-romana-didulo-cult-convoy-canada](https://www.vice.com/en/article/n7ze5w/qanon-queen-romana-didulo-cult-convoy-canada)> [Lamoureux, "Inside"].

⁸⁵ Sarteschi, "Self-Proclaimed Queen," *supra* note 62; Lamoureux, "Inside," *ibid*.

⁸⁶ Will Sommer, "QAnon 'Queen of Canada' Wants Some American Subjects," *Daily Beast* (2 August 2022), online: <[thedailybeast.com/qanon-queen-of-canada-romana-didulo-wants-some-american-subjects](https://www.thedailybeast.com/qanon-queen-of-canada-romana-didulo-wants-some-american-subjects)>; Sarteschi, "Inroads," *supra* note 62.

⁸⁷ Lamoureux, "Inside," *supra* note 84.

⁸⁸ Mack Lamoureux, "The QAnon Queen Told Followers They Didn't Need to Pay Bills. It Didn't End Well," *Vice* (10 May 2022), online: <[vice.com/en/article/z3na53/qanon-queen-bills-electricity-canada](https://www.vice.com/en/article/z3na53/qanon-queen-bills-electricity-canada)>; Sarteschi, "Self-Proclaimed Queen," *supra* note 62; Anglesey, "Arrest," *supra* note 61; Lana Michelin, "The So-Called 'Queen of Canada' Cannot Help Red Deerians Avoid Paying Property Taxes," *Red Deer Advocate* (17 August 2022), online: <reddeeradvocate.com/news/the-so-called-queen-of-canada-cannot-help-red-deerians-avoid-paying-property-taxes/>.

⁸⁹ Francis Pilon, "Saisie de véhicules de la « reine » du Canada," *Le Journal de Montréal* (3 June 2022), online: <[journaldemontreal.com/2022/06/03/deux-vehicules-de-la-reine-autoproclamee-du-canada-saisis-au-quebec](https://www.journaldemontreal.com/2022/06/03/deux-vehicules-de-la-reine-autoproclamee-du-canada-saisis-au-quebec)>.

⁹⁰ Anglesey, "Arrest," *supra* note 61.

⁹¹ Examiner staff, "Tables Turned as Romana Didulo, Supporters Attempt to 'Arrest' Peterborough Police," *Toronto Star* (13 August 2022), online: <[thestar.com/pe/news/peterborough-region/2022/08/13/romana-didulo-supporters-attempt-to-arrest-peterborough-police.html](https://www.thestar.com/pe/news/peterborough-region/2022/08/13/romana-didulo-supporters-attempt-to-arrest-peterborough-police.html)>; Greg Davis, "3 Romana Didulo Followers Charged After Attempting to 'Arrest' Peterborough Police," *Global News* (15 August 2022), online: <globalnews.ca/news/9060426/romana-didulo-peterborough/>; David Fraser, "QAnon-Inspired Protest in Peterborough, Ont., Prompts Investigation," *CBC News* (18 August 2022), online: <www.cbc.ca/news/canada/ottawa/protest-peterborough-arrest-special-investigation-1.6552575>.

⁹² *R v Frank E Curtin* (14 August 2022), Peterborough 3311998223310182500 (Ont Ct J); *R v Timothy Claudio* (14 August 2022), Peterborough 3311998223310182600 (Ont Ct J).

In many senses, Didulo's startling success in Canada as a pseudolaw leader is unprecedented. Pseudolaw groups usually implode when their schemes do not provide the promised results.⁹³ However, with Didulo, the principle that "nothing teaches like failure" appears to have little application, at least thus far. Instead, Didulo makes increasingly fantastic announcements and claims, and demands yet more contributions from her followers. Setbacks seem to have little effect on Didulo's overall momentum.

Some observers have called Didulo's operation a cult.⁹⁴ The label is very apt. Terrorist, cultic, and pseudolaw groups share parallels aspects,⁹⁵ and, in a sociological sense, appear to operate following common bases. Pseudolaw groups often adopt explicitly religious foci.⁹⁶ While Didulo has not (yet) declared her divinity, Didulo clearly self-identifies as otherworldly: an alien being not of this Earth, but who possesses extraordinary power and authority.

Scientology during the Sea Organization (Sea Org) period may be the best analog to Didulo's current itinerant cross-Canada mission. During this nearly ten year period, "Commodore" L. Ron Hubbard travelled around the globe in a polyglot convoy of second-hand ships, surrounded by a personal uniformed navy of Sea Org devotees. Hubbard spun increasingly bizarre narratives of past lives, ancient gold, and alien rebellions, while his crews and servants endured serf-like conditions, and were "overboarded" (literally) at the slightest disapproval. Whenever confronted by government agents, Hubbard's fleet simply relocated outside state authority.⁹⁷ In this context, Hubbard had nearly unlimited control over his followers, with his activities funded by a worldwide cloud of Scientologists.

Didulo seems to be operating a Sea Org "on the cheap." Where her voyage will end is anyone's guess. Perhaps, next, she too will buy a ship.

C. KEVIN DANIEL ANNETT AND THE REPUBLIC OF KANATA

Pseudolaw has a broad potential range of applications.⁹⁸ Consequentially, pseudolaw's promoters are an eclectic assortment of counter-authority and criminal actors. One such unusual individual is Kevin Daniel Annett, also known as "Eagle Strong Voice," a defrocked United Church of Canada minister who has made a career of advancing conspiratorial claims

⁹³ Netolitzky, "History #2," *supra* note 2 at 814–20; Donald J Netolitzky, "Ten Seconds to Implosion: The Magna Carta Lawful Rebellion" (2023) 6 Intl J Coercion, Abuse & Manipulation [Netolitzky, "Implosion"].

⁹⁴ See e.g. CBC News: The National, "Romana Didulo's Extremist Cult: What Kind of Threat Does it Pose?" (18 August 2022), online (video): <[youtube.com/watch?v=lRnbdyxZRgl](https://www.youtube.com/watch?v=lRnbdyxZRgl)>; Lamoureux, "Inside," *supra* note 84.

⁹⁵ Masoud Banisadr, "Terrorist Organizations Are Cults" (2009) 8:2 *Cultic Studies Rev* 154; Christopher M Centner, "Cults and Terrorism: Similarities and Differences" (2003) 2:2 *Cultic Studies Rev* 64; Saul Levine, "Youth in Terroristic Groups, Gangs, and Cults: The Allure, the Animus, and the Alienation" (1999) 29:6 *Psychiatric Annals* 342; Darin J Challacombe, "Synergy Between Cults and Terror Groups: A Systematic Review of Recruitment Processes" (2022) 3 *International J Coercion, Abuse & Manipulation*; Stephen A Kent & Robin D Willey, "Sects, Cults and the Attack on Jurisprudence" (2013) 14:2 *Rutgers JL & Religion* 306; Netolitzky, "Implosion," *supra* note 93 at I.

⁹⁶ Netolitzky, "Itch," *supra* note 5 at 175–76.

⁹⁷ Russell Miller, *Bare-Faced Messiah: The True Story of L. Ron Hubbard* (Toronto: Key Porter Books, 1987) at 263–333; Jon Attack, *A Piece of Blue Sky: Scientology, Dianetics and L. Ron Hubbard Exposed* (New York: Carol Publishing Group, 1990) at 165–214. Both authors review this period. The Sea Org remains the inner administrative and power authority in Scientology.

⁹⁸ Netolitzky, "Itch," *supra* note 5 at 171–78.

that are best characterized as avid self-promotion. Annett's initial focus were exposes in numerous books⁹⁹ and websites¹⁰⁰ that Annett claimed were made on behalf of Indigenous groups. These publications allege wrongdoing and persecution by a range of religious, political, and monarchy figures, and piggybacked on residential schools and First Nations rights controversies.¹⁰¹

Annett subsequently expanded into pseudolaw. That initially, in 2012, took the form of a fake common law court: the International Tribunal into Crimes of Church and State (ITCCS).¹⁰² Between 2012–2013, the ITCCS announced it had dissolved Canada, and convicted and ordered the arrest of numerous politicians and religious figures for genocide.¹⁰³ Annett also authored several pseudolaw texts,¹⁰⁴ and, on 15 January 2015, proclaimed the foundation of an alternative/replacement “common law” nation state: the “Republic of Kanata.”¹⁰⁵ Kanata did not attract significant interest from Canada's pseudolaw community, then predominantly Freemen, who were in marked decline.

While Annett usually operates as a “one man show,” he has proven surprisingly effective in self-advertising and disseminating his claims in marginal media outlets and social media. Annett's publicity successes have even led to multiple debunking responses by Snopes, USA Today, Politifact, and Reuters in response to Annett's claims: (1) that Annett caused Pope Benedict XVI's resignation;¹⁰⁶ (2) of a \$10,000 reward for the arrest of Pope Francis for “personal complicity in child rape, torture and trafficking, [and] ritual killing”;¹⁰⁷ (3) that

⁹⁹ See e.g. Kevin D Annett, *Hidden No Longer: Genocide in Canada, Past and Present* (The International Tribunal into Crimes of Church and State & The Friends and Relatives of the Disappeared, 2010); Kevin D Annett, *Murder by Decree: The Crime of Genocide in Canada: A Counter Report to the “Truth and Reconciliation Commission”* (Toronto: International Tribunal for the Disappeared of Canada, 2016); Kevin D Annett, *Unrelenting: Between Sodom and Zion* (Self-published, 2016); Kevin D Annett, *Unbroken: My Life as a Truth Teller* (Self-published, 2020).

¹⁰⁰ See e.g. “Hidden from History,” online: *Internet Archive* <web.archive.org/web/20110702203226/http://www.hiddenfromhistory.org/>; <canadiangenocide.nativeweb.org/>; <murderbydecree.com/>.

¹⁰¹ See Greg Renouf, “Kevin Annett,” online: *genuiNEWitty* <www.genuinewitty.com/people/kevin-annett/> for a comprehensive, if flamboyant, review of Annett's history and activities. See also Terry Glavin, “Truth and Native Abuse: How One Man's Claims Threaten Success of Truth and Reconciliation,” *The Tyee* (30 April 2008), online: <thetyee.ca/Views/2008/04/30/TruthAndAbuse/>.

¹⁰² “Welcome to ITCCS.ORG and the International Tribunal into Crimes of Church and State,” online: *Internet Archive* <web.archive.org/web/20190109093034/http://itccs.org/>; see current website: Kevin Annett, “ITCCS Updates,” online: <murderbydecree.com/blog/>.

¹⁰³ “Common Law Court Documents,” online: *Internet Archive* <web.archive.org/web/20141222204932/http://itccs.org/common-law-court-documents/>. The Ontario Superior Court of Justice in 2016 rejected ITCCS rulings and orders as products of “non-existent or self-created tribunals”: *Chalupnick v CAS Ottawa*, 2016 ONSC 2787 at para 10.

¹⁰⁴ Kevin Annett, *Common Law Community Training Manual* (Brussels: International Tribunal into Crimes of Church and State, 2013); Kevin Daniel Annett, *Establishing the Reign of Natural Liberty: A Common Law Training Manual* (International Common Law Court of Justice, 2017).

¹⁰⁵ “Republic of Kanata,” online: *Internet Archive* <web.archive.org/web/20210615003954/http://kanata-republic.ca/>.

¹⁰⁶ David Mikkelson, “Pope Benedict Resignation” (15 March 2013), online: <snopes.com/fact-check/pope-benedict-resignation/>.

¹⁰⁷ Bayliss Wagner, “Fact Check: False YouTube Video Promises \$10,000 to ‘Detain’ Pope Francis,” *USA Today* (7 November 2021), online: <usatoday.com/story/news/factcheck/2021/11/07/fact-check-viral-youtube-hoax-claims-pope-francis-issued-international-arrest-warrant/6253684001/>.

European royalty conduct “human hunting parties” of naked teenagers;¹⁰⁸ and (4) that Queen Elizabeth II in 1964 personally kidnapped ten Indigenous children.¹⁰⁹

Unsurprisingly, Annett jumped on the COVID-19 resistance bandwagon. He, on 15 July 2020, resurrected the Republic of Kanata, a “Sovereign Republic” that “disestablished the political authority of the British Crown in Canada and replaced it with a sovereign nation.”¹¹⁰ Annett claimed Kanata eliminated all debts and income tax. All Kanatians would receive 200 hectares of Crown land, and other wealth hoarded by state and institutional actors. “Republic sheriffs” and “Common Law Courts” would arrest and try “the old regime,” and those who engaged in “genocide” via “scamdemic” pandemic management and vaccination health measures. Annett resumed publishing claims that Kanata’s “Grand Juries,” “Common Law Courts,” and other vigilante organs were already prosecuting politicians and church figures, and dismantling Canadian and international authorities.¹¹¹ This culminated in a 15 January 2022 “Judgement of the International Common Law Court of Justice” that convicted numerous state and religious actors of “Crimes against Humanity,” and an associated “Arrest Warrant” and “Warrant of Seizure and Expropriation.” Annett awarded himself \$27.5 million for being fired by the United Church of Canada, being divorced by his ex-wife in 1995, and “systematic ‘black operation’” and “chemical poisoning” by various church, police, and government actors.¹¹²

One new development was Annett decreed the formation of regional “Common Law Assemblies”: self-organized vigilante government authorities. Several such Assemblies did emerge, at least on a transitory basis.¹¹³ As of the date of this article, no related websites remain active. Annett also called for physical action to destroy vaccines and impede

¹⁰⁸ David Mikkelson, “Are European Royals Killing Naked Children for Fun at Human Hunting Parties?” (10 June 2015), online: <www.snopes.com/fact-check/hunting-license/>.

¹⁰⁹ Bethania Palma, “About that Rumor the Queen Abducted Indigenous Children in Kamloops, Canada” (8 June 2021), online: <snopes.com/articles/347191/queen-kamloops-abduction-rumor/>; Jason Asenso, “Queen Elizabeth Did Not Kidnap 10 Children from a Canadian School” (23 July 2021), online: <politifact.com/factchecks/2021/jul/23/facebook-posts/queen-elizabeth-did-not-kidnap-10-children-canada/>; Reuters Fact Check, “Fact Check-Debunking Claims About Disappearing School Children in 1964 in British Columbia, Canada” (24 March 2021), online: <reuters.com/article/factcheck-missing-children-canada-idUSL1N2LM0VL>.

¹¹⁰ Online: *Republic of Kanata* <web.archive.org/web/20210615043234/http://kanatarepublic.ca/what-is-the-republic-of-kanata/>.

¹¹¹ Kevin A. “hiddenfromhistory100,” online: <youtube.com/user/hiddenfromhistory100/videos>; “Republic of Kanata: Breaking News,” online: *Internet Archive* <web.archive.org/web/20220118154948/republicofkanata.ca/category/breaking-news/>.

¹¹² “International Common Law Court of Justice: Global Breaking News: January 15, 2022,” online: *Internet Archive* <web.archive.org/web/20220115032313/https://republicofkanata.ca/wp-content/uploads/2022/01/Verdict-and-Sentence-of-the-International-Common-Law-Court-of-Justice.pdf>; “Republic of Kanata: Breaking News From the International Common Law Court of Justice, January 15, 2022 (GTM) Big Pharma, Government, Church Leaders Face Arrest as Court Convicts Them of Genocide, Prohibits Injections,” online: *Internet Archive* <web.archive.org/web/20220118100828/https://republicofkanata.ca/2022/01/14/breaking-news-from-the-international-common-law-court-of-justice-january-15-2022-gtm-big-pharma-government-church-leaders-face-arrest-as-court-convicts-them-of-genocide-prohibits-injections/>.

¹¹³ “Atlantic Common Law Assembly,” online: *Internet Archive* <web.archive.org/web/20201101073724/https://atlanticcommonlaw.wixsite.com/atlanticcommonlaw>; “Greater Victoria Common Law Assembly,” online: *archive.today* <archive.md/WwwWw>; “Greater Edmonton Common Law Assembly,” online: *Internet Archive* <web.archive.org/web/20210301153104/https://gecla.ca/>. Also see generally Drew, “Common Law Assemblies’ Forming Across Canada, Leader Endorses Sabotaging Vaccine Supplies” (30 November 2020), online (blog): <neetnewz.substack.com/p/common-law-assemblies-forming-across>. Paul Klaszus (“Paul Klaszus,” online: <facebook.com/pjklaszus/>), the apparent lead personality of the Greater Edmonton Common Law Assembly, in early 2021 was briefly engaged in un sophistication pseudolaw instruction in Alberta following the traditional guru lecture format.

vaccination programs, and to sabotage 5G telecommunications networks.¹¹⁴ The 5G demands, and earlier “chemtrails” prosecution claims, illustrate Annett is tightly bound to stereotypical international improvisational millennialist conspiracy theories.¹¹⁵

Annett explicitly sought to link himself with the 2022 Ottawa pandemic mitigation protest movement via a 15 January 2022 Republic of Kanata arrest warrant for Prime Minister Justin Trudeau, and a 24 February 2022 ITCCS proclamation that called for the formation of a revolutionary government, vigilante “Sheriffs,” and a “Citizens’ Militia.”¹¹⁶ No evidence indicates Annett attracted any support or attention from that protest community. Most recently, the 24–30 July 2022 Papal visit to Canada triggered another flurry of activity from Annett and the ITCCS. First, the ITCCS banned Pope Francis from entering Canada,¹¹⁷ and then, post-visit, ordered seizure of church and government property by “[t]he people and their Sheriffs,” a step purportedly warranted by a “[P]apal admission of genocide.”¹¹⁸

Annett’s efforts to expand his influence during the COVID-19 pandemic have clearly had some impact. His more dramatic (and typically highly questionable) announcements, such as the \$10,000 bounty on Pope Francis, attracted substantial Internet-based attention.¹¹⁹ However, nothing indicates any of Annett’s claims precipitated (actual) court litigation, or direct real world activity. If anything, broader public attention has further compromised Annett’s standing as a valid and credible public personality. For example, the University of British Columbia recently cancelled an on-campus speaking engagement by Annett.¹²⁰ Annett’s part in the pandemic pseudolaw process is best characterized as one-man theatrics and spectacle, and, at most, a very temporary diversion for those dissatisfied with public health and vaccination policies.

¹¹⁴ Drew, *ibid.*

¹¹⁵ “Kevin Annett: Brussels Trial of Pope, UK Queen for Genocide. USA Prosecution for Chemtrails, Fraudulent Financial Foreclosures” (25 February 2014), online: <exopolitics.blogs.com/exopolitics/2014/02/video-kevin-annett-brussels-trial-of-pope-uk-queen-for-genocide-usa-prosecution-for-chemtrails-fraud.html>.

¹¹⁶ Kevin Annett, “An Urgent Message to the Convoy Truckers and to all Canadians and Lovers of Freedom” (26 February 2022), online (blog): <murderbydecree.com/2022/02/26/an-urgent-message-to-the-convoy-truckers-and-to-all-canadians-and-lovers-of-freedom/>.

¹¹⁷ Kevin Annett, “Public Notice and Media Release Tuesday, July 5, 2022—Court Injunction Bans Pope Francis from Entering Canada and Meeting With Chinese; Police and Public are Empowered to Arrest the Pope as Protests and Disruptions Loom” (4 July 2022), online (blog): <murderbydecree.com/2022/07/04/public-notice-and-media-release-tuesday-july-5-2022-court-injunction-bans-pope-francis-from-entering-canada-and-meeting-with-chinese-police-and-public-are-empowered-to-arrest-the-pope-as-protests/>.

¹¹⁸ Kevin Annett, “Catholic Church Banned and Its Wealth Seized by New Law in the Wake of Papal Admission of Genocide” (4 August 2022), online (blog): <murderbydecree.com/2022/08/04/catholic-church-banned-and-its-wealth-seized-by-new-law-in-the-wake-of-papal-admission-of-genocide/>.

¹¹⁹ This YouTube video in under a month attracted over 150,000 views: Kevin A, “Arrest Order Issued Against Pope Francis; Reward and Amnesty Offered as Trial Set to Begin” (31 October 2021), online (video): <[youtube.com/watch?v=DRWjVJjRKn0](https://www.youtube.com/watch?v=DRWjVJjRKn0)>.

¹²⁰ Charlie Smith, “UBC Administration Cancels Event Featuring Mass-Grave-Denying Filmmaker and Antivaccine Activist,” *The Georgia Straight* (12 November 2021), online: <straight.com/education/ubc-administration-cancels-event-featuring-mass-grave-denying-filmmaker-and-antivaccine>.

D. TRUE NORTH GUARDIANS ALLIANCE/ LAKESHORE SOVEREIGN ASSEMBLY

Another further alternative/replacement government scheme that appeared in 2021 is advanced by two affiliated websites: the “True North Guardians Alliance,”¹²¹ and the “Lakeshore Sovereign Assembly.”¹²² The former website promotes stereotypical pseudolaw motifs: (1) persons are only subject to “common law”; (2) “Canada is not a [country]” New Constitutionalist theories; and (3) state authority flows from the Strawman and birth documentation.¹²³ Valid authority allegedly vests with the “International Natural and Common Law Tribunal for Public Health and Justice.”¹²⁴ The True North Guardians Alliance website makes anti-vaccine and “scamdemic” claims, though its website also includes New Age “Spiritual Command Suggestions,” for example how one can invoke “a personal team” of “Pleidian[s] ... [and] direct assistance from beings of light” by chanting “Command 12 21.”¹²⁵

The Lakeshore Sovereign Assembly states self-governing “Sovereign[s]” are the government: “The government IS YOU.”¹²⁶ Its website claims Strawman process “Notices” taught by the True North Guardian Alliance secure a Sovereign’s “soul-responsibility” and personal and group rights.¹²⁷ The Sovereign Assembly provides “basic framework and benchmarks to ensure that the Provincial Assemblies are correctly populated and that the Assembly Members are protected.”¹²⁸ This website also publishes purported arrest documents that target politicians and law enforcement.

Despite pointing to certain Canadian pseudolaw sources, the True North Guardians Alliance and Lakeshore Sovereign Assembly seem principally inspired by non-Canadian sources, including the UK-based Common Law Courts,¹²⁹ and the “Florida State Assembly,” the model “Assembly” of this kind.¹³⁰ These groups use pseudolaw documents with obvious Sovereign Citizen influences, such as US Uniform Commercial Code filings.¹³¹

Social media suggests a customer base in the hundreds, or, at most, low thousands. Much activity is located in Halton, Ontario, but documents from adherents have been sent to government and court authorities across Canada. To date, no known litigation has been linked to the Lakeshore Sovereign Assembly, or any other Sovereign Assembly.

¹²¹ “Home,” online: *True North Guardians Alliance* <tngalliance.com> [“Home,” *True North*]; “True North Guardians Alliance,” online: <facebook.com/groups/789462565092297/>.

¹²² Online: <lakeshore.sovereignassembly.com>.

¹²³ “Home,” *True North*, *supra* note 121.

¹²⁴ “International Natural and Common Law Tribunal for Public Health and Justice,” online: <exopolitics.blogs.com/international_criminal_co/>.

¹²⁵ “Spiritual Command Suggestions,” online: *True North Guardians Alliance* <tngalliance.com/spiritual%2Fhealing>. “Pleidians” are purportedly a race of “Nordic” or “Aryan” extraterrestrials.

¹²⁶ Online: <lakeshore.sovereignassembly.com>.

¹²⁷ “Becoming Sovereign,” online: <lakeshore.sovereignassembly.com/becoming-sovereign/>.

¹²⁸ Online: <lakeshore.sovereignassembly.com>.

¹²⁹ Online: *Common Law Courts: Great Britain and International* <www.commonlawcourt.com>.

¹³⁰ Fudo Shin, “! ! IT HAS BEGUN...” (18 January 2022), posted on *True North Guardians Alliance*, online: <facebook.com/groups/789462565092297/posts/925775634794322/>.

¹³¹ See e.g. “Lintott Kaylen Strawman Removal Protocol 2022,” online: <mediafire.com/file/vg9806060vaj24/Lintott_Kaylen_strawman_removal_protocol_2022.pdf/file>.

E. THE SOVEREIGN REPUBLIC OF BRITISH COLUMBIA

The Sovereign Republic of British Columbia¹³² is another pseudolaw alternative/replacement government that appeared in late 2020.¹³³ The Sovereign Republic uses New Constitutionalist “no Canada” arguments to allegedly displace the “De facto Corporation British Columbia masquerading as a constitutional government” created when the *Statute of Westminster* misfired.¹³⁴ However, the Sovereign Republic then vests ultimate authority with unnamed “Tribal Clan Mothers” who hold “Territorial Title.”¹³⁵ Individual “sovereign man and woman” property owners have “allodial title,” and are subject to “common law.”¹³⁶

At present this pseudolaw movement is essentially undeveloped. Its chief activity has been to serve template “Notices”¹³⁷ on federal, British Columbia, and municipal government actors.¹³⁸ The Sovereign Republic’s adherent base is probably very limited. Media reports identify Kelowna, British Columbia resident Joshua Flint as the Sovereign Republic’s founder and central personality.¹³⁹ Neither Flint nor the Sovereign Republic are linked to any identified litigation. Flint operates the longstanding “Goodly Lawful Society” pseudolaw website¹⁴⁰ that includes unorthodox claims concerning the origin and genetic characteristics of Indigenous populations, and the medical properties of materials such as “humic acid” powder, a plant decay product.¹⁴¹

F. THE ARBUTUS NATION STATE

The apparently now defunct “Arbutus Nation State” is another alternative/replacement government that operated in British Columbia from late 2020 to early 2022, “based on Land Common Law and restoring liberty to all who inhabit this land.”¹⁴² The Arbutus Nation State promised dual citizenship that retained Canadian government benefits, involved no tax obligations, and resulted in additional “Natural Law” special privileges.¹⁴³ While the scope of its exact claimed authority is unclear, military, law enforcement, and court activity is

¹³² Online: *The Sovereign Republic of British Columbia* <sovereignrepublicbc.org>.

¹³³ “The Sovereign Republic of British Columbia,” online: *Internet Archive* <web.archive.org/web/20201222181604/https://sovereignrepublicbc.org/>.

¹³⁴ “Mission,” online: *The Sovereign Republic of British Columbia* <sovereignrepublicbc.org/mission/>; “Declaration of Independance,” online: *The Sovereign Republic of British Columbia* <sovereignrepublicbc.org/wp-content/uploads/2021/01/DECLARATION-of-Independence-BC2.pdf>.

¹³⁵ “Mission,” *ibid.*

¹³⁶ “Declaration of Independance,” *supra* note 134.

¹³⁷ See e.g. “Notice of Trespass and Personal Liability,” online: *The Sovereign Republic of British Columbia* <sovereignrepublicbc.org/wp-content/uploads/2021/01/David-Lametti-Minister-of-Justice-and-Attorney-General-Canada-.pdf>.

¹³⁸ “Notices Served: Names Starting with A-J,” online: *The Sovereign Republic of British Columbia* <sovereignrepublicbc.org/notices-served-a-j/>; “Notices Served: Names Starting with K-Z,” online: *The Sovereign Republic of British Columbia* <sovereignrepublicbc.org/notices-served-k-z/>.

¹³⁹ Jon Manchester, “Who Is Behind the Sovereign Republic of British Columbia?” (3 February 2021), online: <castanet.net/news/BC/323268/Who-is-behind-the-Sovereign-Republic-of-British-Columbia->.

¹⁴⁰ From at least 2014 (online: *Internet Archive* <web.archive.org/web/20140419035253/http://thegoodlylawfulsociety.org/>); current website: online: *Goodly Lawful Society* <thegoodlylawfulsociety.org>.

¹⁴¹ Joshua Flint, “Fulvic Acid and Spiked Proteins,” (10 March 2022), online: <thegoodlylawfulsociety.org/fulvic-acid-and-spiked-proteins/>.

¹⁴² “Arbutus Nation State: Home,” online: *Internet Archive* <web.archive.org/web/20211226203413/http://theansa.org/>.

¹⁴³ “Arbutus Nation State: FAQ,” online: *Internet Archive* <web.archive.org/web/20220108231337/http://theansa.org/pages/faq.shtml>; “Arbutus Nation State: Constitution,” online: *Internet Archive* <web.archive.org/web/2022010823402/http://theansa.org/pages/constitution.shtml>.

squarely identified as within the Arbutus Nation State's jurisdiction.¹⁴⁴ Like the New Constitutionalists, many identified rights that (purportedly) result from citizenship are unremarkable; however, the declared unlimited authority to own weaponry, including "exotic arms," and exercise force, demonstrates an ideological link to militia perspectives.¹⁴⁵

The theoretical foundation endorsed by the Arbutus Nation State is largely unremarkable US-derived concepts explicitly sourced to gurus, including Mark Passio and Christopher James Pritchard (see Part VI.A, below).¹⁴⁶ Two unique motifs are: (1) a four-part system of law that parallels the classical pre-science "four elements" scheme for matter: "The word 'LAWS' is an acronym for our four jurisdictions: Land, Air, Water, and Soil";¹⁴⁷ and (2) that "Galactic Law," 144,000 "astrophysical frequencies energy principles," will govern the Arbutus Nation State once Earth is "welcomed back into the Galactic Community."¹⁴⁸

The Arbutus Nation State was a marginal pseudolaw movement. Social media sources suggest only several hundred adherents, whose principle activity was anti-"scamdemic" protests.¹⁴⁹ This alternative/replacement government apparently issued identification documents. No litigation linked to the Arbutus Nation State has been identified.

G. CONCLUSION

The emergence of Canadian pseudolaw-based alternative/replacement government structures is a comparatively minor expansion of Canada's not-law and marginal community landscapes. No Canadian alternative/replacement government has recruited enough supporters to conduct "a revolution from below," nor could one realistically do so. Existing Canadian alternative/replacement authorities are either "one man shows" or "LARPing,"¹⁵⁰ rather than plausible alternative government structures. The most developed pseudolaw administration, the New Constitutionalists, has not matured past the "debating society" stage.

Vigilante courts and law enforcement could emerge from these false governments, claiming authority on that basis. That development poses genuine risks. As previously indicated, alternative/replacement governments have no possibility to obtain broad-based support or genuine authority. In that sense alternative/replacement governments are weak excuses to engage in force, but, unfortunately, may still suffice to motivate and trigger "do-it-yourself" vigilantes into action. Queen Didulo demonstrates the significant public threat that can result, even when a pseudolaw movement or leader is a marginal social actor. A few "duck hunters" moving to "execute" those condemned by "Royal Decree" would be a very significant development within Canada's extremist violence ecosystem. Worse, Queen

¹⁴⁴ "Arbutus Nation State: Covenant," online: *Internet Archive* <web.archive.org/web/20220108231358/http://theansa.org/pages/covenant.shtml>; "Arbutus Nation State: Constitution," *ibid.*

¹⁴⁵ "Arbutus Nation State: Bill of Liberties, Rights and Unalienable Rights," online: *Internet Archive* <web.archive.org/web/20220108231347/http://theansa.org/pages/rights.shtml>.

¹⁴⁶ "Arbutus Nation State: Jurisdiction and Common Laws," online: *Internet Archive* <web.archive.org/web/20211012015033/http://theansa.org/pages/laws.shtml> ["ANSA: Laws"]; "Arbutus Nation State: Videos," online: *Internet Archive* <web.archive.org/web/20220108231407/http://theansa.org/pages/videos.shtml>.

¹⁴⁷ "Arbutus Nation State: Why Land Common Law," online: *Internet Archive* <web.archive.org/web/20211012014946/http://theansa.org/pages/whycommonlaw.shtml>.

¹⁴⁸ "ANSA: Laws," *supra* note 146.

¹⁴⁹ "Arbutus Nation State Assembly," online: <facebook.com/groups/483351109427627/>.

¹⁵⁰ Live Action Role-Playing: role-playing games where participants physically portray their characters.

Didulo's followers believe they are authorized and empowered to conduct "citizens' arrests," anticipating backup by military force. While the August 2022 events in Peterborough have a certain comic-opera aspect, with firearms, lethal violence would not be an unexpected outcome. The precipice past that threshold is very real.

Pseudolaw and its personalities operate in a strange, marginal social space. The idea that anyone might take the Republic of Kanata and its court, or Queen Didulo, seriously, is both absurd but terrifyingly real. This duality reflects that modern western society includes an unreal counterworld: the cultic milieu. For those who exist within that space, pseudolaw has real authority, as do those who brandish its documents. That, alone, is a strong basis why the emergence of Canadian alternative/replacement pseudolaw authorities is cause for concern.

IV. MAGNA CARTA LAWFUL REBELLION

The Magna Carta Lawful Rebellion (MCLR) is a new pseudolaw movement that was imported into Canada at roughly the same time as the New Constitutionalists emerged as a significant presence in the Canadian anti-establishment ecosystem. Both movements competed for a similar adherent population, though the manner in which each movement manifested was very different. A detailed study has recently described the MCLR and its history,¹⁵¹ so this article will only sketch out the MCLR's belief system, and focus on its Canadian aspects.

The MCLR was invented in 2014 by UK pseudolaw guru David Robinson, who claimed the 1215 *Magna Carta* has supraconstitutional authority that was invoked in 2001 when 28 "New Rebel Barons" challenged the UK's increased integration into the European Union.¹⁵² The result, according to Robinson, is all state authority in the UK collapsed. An oath of allegiance to Lord Craigmyle of Invernesshire, one of the New Rebel Barons, then places one outside all conventional government and legal authority via "lawful rebellion." Purported lawful rebels may then execute any interfering person as a "traitor and seditious." Despite the draconian character of this scheme, MCLR adherents, including Robinson, instead applied their newfound lawful rebel status within mundane disputes to ignore debts, municipal ("council") tax, utilities, and regulations requiring motor vehicle licences and insurance.¹⁵³

The MCLR was first introduced into Canada in early 2019 by Alberta resident Jacqueline Robinson, who self-identifies with the "common law" name "Jacquie Phoenix." For clarity, this article will use her Phoenix pseudonym. Phoenix had no pre-existing pseudolaw links, but self-associated with the Alberta Yellow Vest community. Phoenix promoted MCLR theory within her "Practical Lawful Dissent International" Facebook group.¹⁵⁴ While Phoenix added nothing to MCLR theories, she proved a highly effective recruiter. Soon her Facebook group had tens of thousands of members.¹⁵⁵ Phoenix's anti-state claims had no or little

¹⁵¹ Netolitzky, "Implosion," *supra* note 93.

¹⁵² *Ibid* at II.B–C.

¹⁵³ *Ibid* at II.D.

¹⁵⁴ Online: <facebook.com/groups/754338414949984>.

¹⁵⁵ As of 21 November 2021 "Practical Lawful Dissent International," *ibid* had 44,213 members.

discernable focus, beyond a general resistance to authorities, and the menacing, but imaginary, improvisational millennialist New World Order.

Robinson died on 10 November 2020.¹⁵⁶ Phoenix immediately declared herself as Robinson's successor, travelled to the UK, and effectively seized control of MCLR communities worldwide. Phoenix is now illegally present in the UK, and, throughout 2021, organized "Redress" meetings in breach of pandemic health quarantine regulations. "Redress" amounted to nothing, despite repeated attempts to recruit police support, and at least some public acts intended to seize government buildings. Phoenix in September 2021 announced the MCLR project had failed, and then blocked public access to MCLR communications channels. With that, the MCLR collapsed.¹⁵⁷ Phoenix herself disappeared until April 2022, when she conducted a public presentation in the basement of a London, UK church with three "talking paintings."¹⁵⁸ Phoenix also at this point indicated she has a terminal health condition.

Phoenix's Canadian adherent pool was much smaller, probably a few hundred individuals at most. MCLR theory requires "lawful rebels" send form documents to courts and police. Many of these were received in Alberta. This "paper terrorism" was almost the full extent of Canadian MCLR activity, except that in 2020 Phoenix personally attempted to intrude into a child custody dispute. That led to several Alberta Court of Queen's Bench decisions that dissected and refuted MCLR theory, and that prohibited Phoenix from acting as a court representative in Alberta proceedings.¹⁵⁹ The result was Phoenix's follower lost all custody of her child.¹⁶⁰ MCLR concepts have also been deployed at least once in Canada as a "get out of jail free" defence.¹⁶¹

Robinson's pseudolaw scheme was, generously, crude and unsophisticated, and provided no enforcement mechanism to achieve its purported benefits.¹⁶² Phoenix added nothing further. The result was a deluge of threatening but confusing form paperwork, that also left Lord Craigmyle himself wondering why thousands of people worldwide were offering their fealty to him as oaths-men and women.¹⁶³

At best, the MCLR was a peripheral component of Canadian pseudolaw. MCLR members worldwide are unsophisticated conspiracists. Despite their threats of vigilante action via "the Gallows," this population were never a meaningful threat to social order.¹⁶⁴ The rise and implosion of the MCLR was driven by the proliferation and dissemination of cultic milieu pseudolaw throughout improvisational millennialist super-conspiracy communities.¹⁶⁵ MCLR adherent ideology was unfocused, less political than simply apprehensive, occupying an

¹⁵⁶ Netolitzky, "Implosion," *supra* note 93 at II.B.

¹⁵⁷ *Ibid* at II.G.

¹⁵⁸ Jacquie Phoenix, "Magna Carte Speech" (30 April 2022), online (video): <youtube.com/watch?v=rVyA1-QQASg>.

¹⁵⁹ *AVI v MHVB*, 2020 ABQB 489, representation limitations imposed 2020 ABQB 790 [AVI #2].

¹⁶⁰ *AVI #2*, *ibid* at para 38.

¹⁶¹ *R v Viau*, 2022 ONSC 5825.

¹⁶² Netolitzky, "Implosion," *supra* note 93 at II.C.

¹⁶³ Denounce the Deception UK, "Lord Craigmyle Speaks on the 2001 Invocation of Article 61" (23 January 2018), online: <youtube.com/watch?v=RevKbM1L98I>.

¹⁶⁴ Netolitzky, "Implosion," *supra* note 93 at II.C–D.

¹⁶⁵ Michael Barkun, *A Culture of Conspiracy: Apocalyptic Visions in Contemporary America*, 2nd ed (Berkeley: University of California Press, 2013).

intersection where paranoid QAnon perspectives met New Age and anti-science nonsense, and medical, health, and safety paranoia. Pseudolaw often is fundamentally illogical — ritual and magic — rather than anything rational.¹⁶⁶ That is probably the best explanation for the MCLR: a strange document-based spell intended to miracle away state authority. While most pseudolaw adherents are unsophisticated, unsuccessful persons, both the MCLR leadership and their followers represent a low point in pseudolaw, a dismal, disorganized, uneducated, and socially marginal collective.¹⁶⁷ The rise and fall of the MCLR was a hollow, transient, crisis-driven process, supercharged by the unusual circumstances and social tensions resulting from the COVID-19 pandemic, that deflated without even any external pressure.

V. SELF-DESIGNATED INDIGENOUS GROUPS

Certain pseudolaw promoters and adherents in the US, Canada, New Zealand, and Australia have coupled Indigenous self-identification and pseudolaw to claim extraordinary legal status.¹⁶⁸ Hybrid Indigenous/pseudolaw schemes take many forms.

Non-Indigenous Sovereign Citizen groups sometimes simply claim to have Indigenous character, for example the Little Shell Pembina Band and the Tuscarora Nation.¹⁶⁹ Certain Moorish Law movement branches claim to be “Indians.”¹⁷⁰ Sometimes these claims are simply grafted on to well-established pseudolaw schemes,¹⁷¹ or are a purported global mechanism to deny the legitimacy of state or institutional authority.¹⁷²

Post-2015, Indigenous government or administration structures that combine claims of superior rights with pseudolaw language and theories are increasingly commonplace. This implementation of pseudolaw is not new to Canada. Netolitzky, “History #1” reported on the Sovereign Squamish Government (SSG), that claimed to be an independent government not only outside Canadian law, but also superior to actual Squamish First Nations.¹⁷³ While the

¹⁶⁶ Netolitzky, “Magic,” *supra* note 14; Joseph Moore, “Legal Aesthetics Among American Sovereign Citizens” (30 August 2022), online: *PoLAR: Political and Legal Anthropology Review* <polarjournal.org/2022/08/30/legal-aesthetics-among-american-sovereign-citizens/>.

¹⁶⁷ Netolitzky, “Implosion,” *supra* note 93 at II.E, III.

¹⁶⁸ See e.g. Netolitzky, “History #1,” *supra* note 1 at 622, 628–29; Donald J Netolitzky, “Humdrum Becomes a Headache: Lawyers Notarizing Organized Pseudolegal Commercial Argument Documents” (2019) 49:3 *Adv Q* 278 at 299–302; Netolitzky, “Pathogen,” *supra* note 7 at 15–17; Cam Wilson, “Anti-Vaxxers Are Targeting NT Indigenous Communities with Quarantine and Vaccine Conspiracies,” *Crikey* (26 November 2021), online: <crikey.com.au/2021/11/26/anti-vaxxers-are-targeting-nt-indigenous-communities/>; Jack Latimore, ““Blackfishing”: Alt-Right Pushes to Co-Opt Aboriginal Tent Embassy to Cause,” *The Sydney Morning Herald* (8 January 2022), online: <smh.com.au/national/blackfishing-alt-right-pushes-to-co-opt-aboriginal-tent-embassy-to-cause-20220105-p591zj.html>.

¹⁶⁹ Netolitzky, “History #1,” *supra* note 1 at 629; Anti-Defamation League, *The Lawless Ones: The Resurgence of the Sovereign Citizen Movement*, 2nd ed. (Anti-Defamation League: 2012) at 24–25, online: <adl.org/sites/default/files/documents/assets/pdf/combating-hate/Lawless-Ones-2012-Edition-WEB-final.pdf>.

¹⁷⁰ Sarteschi, *Sovereign Citizens*, *supra* note 10 at 64; Susan Palmer, *The Nuwauibian Nation: Black Spirituality and State Control* (London: Routledge, 2016); Spencer Dew, *The Aliites: Race and Law in the Religions of Noble Drew Ali* (Chicago: University of Chicago Press, 2019). Moors do not typically use the term “Indigenous.”

¹⁷¹ See e.g. *Gauvreau v Lbouthillier*, 2021 ABQB 108, action struck out as abusive 2021 ABQB 172, late appeal refused 2021 ABCA 130.

¹⁷² See e.g. *Toronto Dominion Bank v Giercke*, 2021 ABQB 262 at paras 37–39, action struck out 2021 ABQB 320.

¹⁷³ *Supra* note 1 at 628.

SSG's website remains online,¹⁷⁴ there is no evidence of recent litigation involving SSG concepts, and, instead, SSG activity appears to be limited to marginal announcements, such as that barcodes printed on previous SSG pseudolaw documents "are officially removed from date of creation," and to refuse implantation of monitoring microchips into human bodies.¹⁷⁵ The last identified SSG litigation was in 2017.¹⁷⁶

A. PEOPLES OF THE SALMON

The "Peoples of the Salmon" is a recent example: a "Sovereign Movement" founded in 2020 to take "ownership of property," and that purports to incorporate all persons in British Columbia within "new self-governing communities."¹⁷⁷ The Peoples of the Salmon offers all Canadians memberships, "Exemption Pass" IDs, and "World Passport[s]" for various amounts.¹⁷⁸ Members are called "Wolverines," who are promised \$7.5 million "lifetime dowry" imaginary Strawman bank accounts.¹⁷⁹ "Wolverine" status also requires a "Walking Off the Ship" Ceremony to "leave the Ship of Commerce/Maritime/Admiralty Law – which is a fiction created by the British Crown and the Merchants."¹⁸⁰

Peoples of the Salmon materials reference recognized Indigenous rights claims and uncontroversial historical events, but use certain stereotypic Sovereign Citizen-style pseudolaw language and terminology, including the concept that governments are corporations, a right to not consent to, and opt-out of, legal authority, and Strawman Theory motifs.¹⁸¹

In 2021, the Peoples of the Salmon attracted substantial "scamdemic" resister interest with a "non consent" petition that received over 34,000 signatures,¹⁸² and media reporting.¹⁸³ Despite that, the Peoples of the Salmon appears to be a small and marginal group led by two "Headsm[e]n": David Brian Jefferies Quinn ("popois") and "maathlaatlaa."¹⁸⁴ Quinn has repeatedly and unsuccessfully attempted to apply pseudolaw in British Columbia courts,¹⁸⁵

¹⁷⁴ Online: *Sovereign* ©Skwxwú7mesh/Squamish™ Government <sovsq.gov> [*Sovereign*]. Earlier websites are archived online: "Sovereign Communications Network," online: *Internet Archive* <web.archive.org/web/20160310141428/http://sovcom.net/>; "Sovereign ©Skwxwú7mesh/Squamish™ Government," online: *Internet Archive* <web.archive.org/web/20151104171013/http://www.sovsquamishgov.org/>.

¹⁷⁵ "2020," online: *Sovereign* ©Skwxwú7mesh/Squamish™ Government <sovsq.gov/2020-2/>.

¹⁷⁶ *College of Traditional Chinese Medicine Practitioners and Acupuncturists of British Columbia v Fischer*, 2017 BCSC 1045.

¹⁷⁷ Online: <peoplesofthesalmon.org>.

¹⁷⁸ "How to Join & Fees," online: <peoplesofthesalmon.org/join/how-to-join/>.

¹⁷⁹ "25 Year Plan," online: <peoplesofthesalmon.org/building-community/25-year-plan/>.

¹⁸⁰ "FAQ," online: <peoplesofthesalmon.org/faq/>.

¹⁸¹ "Petition," online: <peoplesofthesalmon.org/join/petition/>; "Peoples of the Salmon: Language to Speak Translation," online: *Internet Archive* <web.archive.org/web/20220523022804/http://peoplesofthesalmon.net/about/language-to-speak-translation/>; "Weekly Gatherings," online: <peoplesofthesalmon.org/about-us/weekly-gatherings/>.

¹⁸² "Removal of Consent," online: <peoplesofthesalmon.org/2021/09/about/removal-of-consent/>.

¹⁸³ Alex McKeen, "This Uniquely Canadian Conspiracy Theory Group Was on the Edges of Obscurity. Then Vaccine Mandates Came Down." *Toronto Star* (14 November 2021), online: <thestar.com/news/canada/2021/11/14/this-uniquely-canadian-conspiracy-theory-group-was-on-the-edges-of-obscurity-then-vaccine-mandates-came-down.html>.

¹⁸⁴ Peoples of the Salmon, online: <youtube.com/channel/UC9ZuAaHtdR1KI FN9Ja-Sg/videos>.

¹⁸⁵ See e.g. *Quinn v Dubnyk*, 2011 BCSC 792; *Quinn v Attorney General of British Columbia*, 2012 BCSC 1287; *Quinn v Bell Pole*, 2013 BCSC 892; *Quinn v Coutts*, 2018 BCSC 655 [*Coutts*], security for costs ordered 2018 BCCA 374, appeal dismissed as abandoned 2018 BCCA 433.

involved himself in other persons' litigation,¹⁸⁶ and is subject to court access restrictions as a "vexatious litigant."¹⁸⁷

Since late 2021, Peoples of the Salmon has sharply escalated its vigilante activity, and begun issuing "Grand Jury" documents. In December 2021, a "Grand Jury" document purported to convict British Columbia Provincial Health Officer Bonnie Henry of "Crimes against Humanity, Genocides, Distribution of a Bio Weapon."¹⁸⁸ Prime Minister Justin Trudeau is a repeat target. On 5 March 2022, Quinn purported to fire Prime Minister Justin Trudeau;¹⁸⁹ then, on 26 June 2022, another "Grand Jury" found Prime Minister Trudeau guilty of numerous offences, including genocide, treason, and international terrorism.¹⁹⁰ The Peoples of the Salmon now directly claims extraordinary status in British Columbia court proceedings. For example, Quinn, as "popois," unsuccessfully attempted to intervene in a family subject dispute, under "Indigenous Law," even though his "client" was Romanian.¹⁹¹

B. KINAKWII AND ASMIN

The Ontario "Kinakwii Private Sovereign Nation"¹⁹² "Sovereign, Indigenous, Aboriginal" country,¹⁹³ and the "Anishinabek Solutrean Metis Indigenous Nation,"¹⁹⁴ (ASMIN) are two interrelated entities whose Indigenous status claims have been rejected and denounced by academics¹⁹⁵ and courts¹⁹⁶ as instances of "raceshifting": illegitimate claims of Indigenous and First Nations status.¹⁹⁷ Both the Kinakwii and ASMIN sell Métis status memberships and promise special "Sovereign" privileges then result.

¹⁸⁶ *Hlatky v Royal Bank of Canada*, 2013 BCCA 7, variation refused 2013 BCCA 129, leave to appeal to SCC refused 35408 (17 October 2013). Pseudolaw promoter Van Gale Dumont, also known as "Steemas" (Donald J Netolitzky, "Lawyers and Court Representation of Organized Pseudolegal Commercial Argument [OPCA] Litigants in Canada" (2018) 51:2 UBC L Rev 419 at 429 [Netolitzky, "Lawyers"]) was also involved in this litigation.

¹⁸⁷ *Coutts*, *supra* note 185 at paras 19–20.

¹⁸⁸ Online: <mediafire.com/file/w1nf2d7ijm75hhx/Peoples_of_the_Salmon_-_Bonnie_Henry_Grand_Jury_2022.pdf>; see also Dayna Furst, "Bonnie Henry, Guilty!" (15 December 2021), online: <peoplesofthesalmon.org/2021/12/bonnie-henry-guilty/>.

¹⁸⁹ Bonobo3D, "Trudeau, You Are Hereby Fired" (5 April 2022), online (video): <bitchute.com/video/TqjxZ0DKPEPC/>.

¹⁹⁰ Online: <mediafire.com/file/suz303z4zl6x9lb/Peoples_of_the_Salmon_Trudeau_2022.pdf>; see also "Grand Jury Declare Trudeau Guilty of Nuremberg Code Violations: Treason, Genocide" (12 July 2022), online: <peoplesofthesalmon.org/2022/07/grand-jury-declare-trudeau-guilty-of-nuremberg-code-violations-treason-genocide/>. An apparently related "Grand Jury Indictment" (Noeline Villebrun, "Salmon People of This Country Have Ordered the Arrest ..." (2 July 2022), online: <facebook.com/noeline.villebrun.1/posts/pfbid05T0a8K8uWLRJak9n1LXRZfrJ7rGj1AFvYpuoTjQF7DKBPTAx6CJCgkT64vZvJFHfl>) mentions collaboration with "Constitutional Sheriffs," US police officers who claim unorthodox authority.

¹⁹¹ *BJ v VL*, 2022 BCSC 1496 at para 33. See also *Bennett v Bennett*, 2022 BCSC 1702 at para 82.

¹⁹² Online: *Kinakwii Nation* <kinakwii.org>.

¹⁹³ Online: *Kinakwii Nation* <kinakwii.org/about/>; "Kinakwii Nation: Brockville, Ontario," online: <waymarking.com/waymarks/WMD221_Kinakwii_Nation_Brockville_Ontario/>.

¹⁹⁴ "Anishinabek Solutrean Métis Indigenous Nation," online: *Internet Archive* <web.archive.org/web/20210621192453/https://www.anishinabeksolutreanmetis.com/>; online: *ASMIN* <askit4equity.com>; online: *Anishinabek Solutrean Metis Indigenous Nation of Turtle Island* <asminofturtleisland.org>.

¹⁹⁵ Andrea Eiding, "Metis and Non-Status Kinakwii Nation/Kinakwii Nation" (8 April 2021), online: <raceshifting.com/metis-and-non-status-kinakwii-nation-kinakwii-nation/>; Andrea Eiding, "Anishinabek Solutrean Métis Indigenous Nation" (9 June 2021), online: <raceshifting.com/anishinabek-solutrean-metis-indigenous-nation/>.

¹⁹⁶ *Sarac v Wilstar Management Ltd*, 2021 ONSC 7776, appeal dismissed as an abuse of court 2022 ONCA 320 [*Sarac*]; *Mukwa v Farm Credit Canada*, 2021 ONSC 1632, appeal dismissed as an abuse of court 2022 ONCA 320 [*Mukwa*]; *Farm Credit Canada v 1047535 Ontario Limited*, 2021 ONSC 3820, appeal dismissed as an abuse of court 2022 ONCA 320 [*Farm Credit*].

¹⁹⁷ Darryl Leroux, *Distorted Descent: White Claims to Indigenous Identity* (Winnipeg: University of Manitoba Press, 2019).

Kinawkii and ASMIN Indigenous claims have been advanced and rejected in diverse Canadian litigation:

1. Detaxer gurus claiming to be Indigenous and outside court jurisdiction;¹⁹⁸
2. landlord/tenant disputes;¹⁹⁹
3. mortgage defaults;²⁰⁰
4. pseudolaw-based attack litigation;²⁰¹
5. family subject disputes;²⁰² and
6. disputes between representative custodians of the property of a person without legal capacity.²⁰³

In a recent omnibus decision that struck out seven ASMIN appeals, the Ontario Court of Appeal rejected ASMIN arguments as hopeless, abusive, pseudolaw claims, noting that ASMIN membership only requires a payment of \$225.²⁰⁴ These appeals were “busybody” actions initiated by an uninvolved party, who the Court barred, except with leave obtained by a formal court application.²⁰⁵ ASMIN is also involved in at least one US proceeding where ASMIN claims an incarcerated prisoner is outside US Federal and Tennessee state law.²⁰⁶

Kinawkii and ASMIN materials and court decisions identify “Grand Chief Buffalo Eagle,” also known as William Allan Baldwin, “Grand Chief Wabiska Mukwa,” also known as Zane Viger Plouffe Bell, and “Clan Grandmother Ikway Michine” as the leaders of these entities.²⁰⁷ However, the keystone legal figure in both groups is a suspended Ontario lawyer: Glenn Patrick Bogue, also known as “Spirit Warrior.” Bogue, Kinawkii Chief justice and the Attorney General of the ASMIN nation,²⁰⁸ provides the legal analysis component of Kinawkii and ASMIN pseudolaw, which is stereotypical Sovereign Citizen theory, but where

¹⁹⁸ *Cardin c R*, 2020 QCCA 98; *Anonyme — 191084*, 2019 QCCSJ 1047; *Cardin c R*, 2019 QCCA 1354; *R v Anderson*, 2016 BCSC 2170 [*Anderson*], appeal quashed 2017 BCCA 153, appeal abandoned 2021 BCCA 101.

¹⁹⁹ *Sarac*, *supra* note 196.

²⁰⁰ *Farm Credit*, *supra* note 196; *National Bank of Canada v Guibord*, 2020 ONSC 8137; *National Bank of Canada v Guibord*, 2021 ONSC 6549, appeal dismissed as an abuse of court 2022 ONCA 320.

²⁰¹ *Mukwa*, *supra* note 196; *Baldwin (Grand Chief Buffalo Eagle) v Ontario (Attorney General)*, 2019 ONSC 2238 [*Baldwin*]; *Guibord v National Bank*, 2021 ONSC 5408 [*Guibord*]; *Farm Credit Canada v 1047535 Ontario Limited*, 2021 ONSC 2541, appeal dismissed as an abuse of court 2022 ONCA 320.

²⁰² *Woodley v Cipolla*, 2022 ONSC 7096. The unorthodox ASMIN “perspicacity” rejected by Justice McDermot has been published online: Letter from ASMIN Grand Chief Wabiska Mukwa to Justice McDermot (6 December 2022), online: <files.constantcontact.com/d6ecec499001/5f8d30a7-5598-4a88-bdde-3885c67da2fd.pdf>.

²⁰³ *Bogue v Bogue*, 2023 ONSC 1642.

²⁰⁴ *Mukwa*, *supra* note 196.

²⁰⁵ *Unrau v National Dental Examining Board*, 2019 ABQB 283 at para 664.

²⁰⁶ *Parsons v US*, 2022 WL 1785280 (WD Tenn Dist Ct).

²⁰⁷ *Mukwa*, *supra* note 196; *Guibord*, *supra* note 201; *Baldwin*, *supra* note 201; *Anderson*, *supra* note 198.

²⁰⁸ *Barreau de Montréal c Bogue*, 2023 QCCQ 3429 at para 53.

governments and courts have no authority over persons who are born in Canada. Bogue says birthplace location defines “Indigenous,” rather than historical community affiliation.²⁰⁹

Netolitzky, “Lawyers” reviews Bogue’s background and post-2016 career as a pseudolaw guru and courtroom advocate.²¹⁰ Bogue’s membership in the Law Society of Ontario was suspended on 10 February 2020,²¹¹ during an aggressively argued disciplinary process that produced no less than 16 Law Society Tribunal decisions. Bogue’s suspension was on mental health grounds. Bogue denied Law Society of Ontario authority; he was born in Canada, and is therefore Métis. At one point Bogue even summoned Ottawa Police Service officers to arrest Law Society staff and the tribunal chair to enforce Bogue’s alleged rights and claimed status.²¹² Bogue, as “Spirit Warrior,” has ignored being suspended, and continues to promote Kinakwii and ASMIN concepts in social media and marginal groups.²¹³ Bogue describes himself as a lawyer when he markets pseudolaw schemes.²¹⁴ On 5 May 2023, the Quebec Superior Court found Bogue/“Spirit Warrior” guilty of having engaged in the unauthorized practice of law.²¹⁵ As of the time of this publication Bogue has yet to be sentenced.

The Law Society of Ontario’s ongoing, inexplicable, and disturbing failure to control Bogue, and to respond to the damage caused by Bogue’s pseudolaw guru activities, while exploiting his lawyer status, is an embarrassment to the profession of law in Canada.

C. OTHER EXAMPLES

This review of Canadian pseudolegal groups that employ Indigenous and First Nations language is almost certainly incomplete. For example, Alberta courts have received what purport to be filings “In the Court of Equity in Alberta Nu’Nene’ (Canada or Americas),” by the “Dene Su’Line (Dene Sovereign),” and “Legal Notices” and “Commands” from “Headman Walking Eagle” of the “Assini Watci Innewak (Rocky Mountain Tribes).” For over a decade, a variety of persons, some litigants, some not, have sent British Columbia and Alberta courts, law enforcement, and government actors pseudolaw documents that exhibit a highly distinctive collection of visual motifs, including peace pipe graphics, medals, and an upside down provincial flag. These materials claim special Indigenous-based status. Their source is unknown, though more recent Peoples of the Salmon documents now include similar features.

The now defunct United Sovran Nations²¹⁶ umbrella organization almost certainly included subordinate Embassy or successor fractions that made Indigenous claims. After this group’s guru, Mario Antonacci, was arrested, newspaper notices were published with

²⁰⁹ “Freedom Convoy” leader Patrick King advanced this claim in his bail proceedings: David Helwig, “Pat King Worries About Catching COVID-19 in an Overcrowded Jail,” *Sootoday* (28 February 2022), online: <sootoday.com/local-news/pat-king-worries-about-catching-covid-19-in-an-overcrowded-jail-5106062>.

²¹⁰ Netolitzky, “Lawyers,” *supra* note 186 at 472–82.

²¹¹ *Law Society of Ontario v Bogue*, 2020 ONLSTH 21.

²¹² *Law Society of Ontario v Bogue*, 2019 ONLSTH 83 at paras 4, 9.

²¹³ *Guibord*, *supra* note 201; *Georgina (Town) v Blanchard*, 2020 ONCA 232; *York Condominium Corporation No 60 v Munro*, 2021 ONSC 487.

²¹⁴ See e.g. “ASMIN Members Newsletter #4” (22 February 2021), online: <askit4equity.com/asmin-members-newsletter-4/>; Netolitzky, “History #2,” *supra* note 2 at 803–806.

²¹⁵ *Barreau de Montréal c Bogue*, *supra* note 208.

²¹⁶ Netolitzky, “History #2,” *ibid* at 823–31.

Strawman Theory name-related claims on behalf of the “mi’kmaq/ deneza-amuskowuk tribal-people,” but also that involved Alberta-area First Nations.²¹⁷ Calgary-area pseudolaw litigant Kenneth Blaine Walter, also known as “ganada-jaaxw©,” and his family are named in these notices. Walter, Antonacci’s right-hand man, is plausibly the person behind them.²¹⁸

D. CONCLUSION

Canadian Indigenous populations can access Canadian courts to advance their interests and concerns. Broad-based adoption of pseudolaw is therefore unlikely, though pseudolaw might emerge during internal disputes to justify alternative leaderships.

A full review of Indigenous characteristics of Peoples of the Salmon, Kinawkii, and ASMIN personalities is beyond the scope of this article, and is better conducted by experts and authorities in this subject. The critical point here is that these individuals and groups, who have claimed Indigenous-related status, also rely on well-known and categorically rejected pseudolaw concepts and motifs.

VI. NEW POST-2015 GURUS AND GROUPS

A new wave of pseudolaw gurus has emerged in Canada post-2015 whose theories do not have direct antecedents within either Detaxer or Freeman precursors.

A. LENTZIAN CHRISTOPHER JAMES PRITCHARD: “A WARRIOR CALLS”

Christopher James Pritchard, who typically self-identifies as “Christopher James,” is a new Canadian pseudolaw promoter who has adopted the traditional Menardian model of a talking head guru who addresses and mobilizes his audience via video broadcasts. Pritchard has operated the *A Warrior Calls* website²¹⁹ since 2018.²²⁰ Pritchard regularly streams videos to his audience,²²¹ which probably ranges into the thousands.²²² Pritchard’s oldest 2015 video²²³ is a formulaic recapitulation of the Strawman Theory duality and birth documentation as clandestine contracts. Pritchard’s biography states he is 55 and a resident of Burlington, Ontario, but is otherwise vague about his background.

Sophisticated pseudolaw gurus mask or misstate their court and legal activities, since those inevitably fail.²²⁴ Unusually, Pritchard’s website and videos document both Pritchard’s

²¹⁷ See Hilfskreuzer Möwe, “The Tacit Supreme in Law Court & United Sovran Nations” (29 July November 2013), online: <quatloos.com/Q-Forum/viewtopic.php?t=9463>.

²¹⁸ See parallel language and concepts in *R v Walter*, 2020 ABQB 181 at Appendix B.

²¹⁹ Online: <awarriorcalls.com>.

²²⁰ “A Warrior Calls,” online: *Internet Archive* <web.archive.org/web/20181109134938/http://www.awarriorcalls.com/>.

²²¹ Pritchard operates multiple social media video archives: “A Warrior Calls,” online: <youtube.com/channel/UC4xG9TWLBluWZuGXwVaS20w?>; <rumble.com/c/c-443257>; <www.bitcchute.com/channel/K6tBDPjVYwHO/>; <www.brighteon.com/channels/awarriorcalls>.

²²² In December 2021, Pritchard’s Telegram account reported over nineteen thousand subscribers, “aWarriorCalls – Common Law Group,” online: *Telegram* <t.me/awarriorcalls>.

²²³ A Warrior Calls, “A Planned Trespass Against the Mind Of Man” (20 September 2015), online (video): <youtube.com/watch?v=_x3BhZqFewU>.

²²⁴ *Meads*, *supra* note 14 at para 80.

and his customers' activities. Published documents illustrate Pritchard's theories, techniques, and failures.

Pritchard's pseudolaw concepts and materials are entirely unoriginal copycat derivatives of Carl (Karl) Rudolph Lentz's Sovereign Citizen theories. Lentz initially operated in the UK circa 2014, where Lentz announced he located a secret, believed abolished "common law" court, the "Court of Queen's Bench."²²⁵ Lentz subsequently claimed that anyone, as "Prosecutors," may set up their own "common law" court to try and convict "Wrongdoers" who have "trespassed" on the Prosecutor's "property." These "do-it-yourself" proceedings purportedly use existing public court facilities. The Prosecutor is also the judge who adjudicates whether "Wrongdoers" have rebutted their presumed guilt, as established by the Prosecutor's "affidavit(s)."²²⁶ Besides Lentz's idiosyncratic paperwork, Lentzians are readily identified as they self-identify as "i, a man," or "i, a woman." Disturbingly, Lentz claims that parents own their children as chattel property, and are therefore immune to state intervention on medical, health, or abuse bases.²²⁷ Lentz has recently been arrested on the charge of torturing a cat or dog to death.²²⁸

In Canada, Lentz's adherents have repeatedly submitted unorthodox paperwork and correspondence to courts that purportedly initialize Lentzian "do-it-yourself" court proceedings. Unsurprisingly, that has consistently failed.²²⁹ Lentz personally has done no better in US litigation that involved his children,²³⁰ in defending Canadian drug traffickers,²³¹ and even when Lentz countersued a convenience store that sought to prosecute Lentz when Lentz repeatedly refused to pay for self-serve coffee.²³²

Pritchard, personally, is guiding at least some Lentzian pseudolaw activity in Canada. Pritchard has published litigation documents from several pseudolaw proceedings that Pritchard acknowledges he is directing. For example, Pritchard acted as a legal representative for COVID-19 denier and "flat Earther" Makhan "Mak" Singh Parhar.²³³ In *Parhar*, Justice Blok struck out an attempt by Parhar to conduct a Lentzian "do-it-yourself" vigilante court, rejecting Pritchard's submissions made as Parhar's "colleague."²³⁴

²²⁵ Netolitzky, "History #1," *supra* note 1 at 631.

²²⁶ Example Lentzian documents: *Lemay v Steele*, 2019 ABQB 602 at para 2; *Lemay v Steele*, 2019 ABQB 429 at Appendix "B"; *Yaremkevich v Jacula*, 2019 ABQB 620 at paras 1, 15 [*Yaremkevich*]; *Babb*, *supra* note 21 at para 6; *Anderson v Ossowski*, 2021 ABQB 382 [*Ossowski*] at Appendices "A," "B," "C"; *Anderson v Ossowski*, 2021 ABQB 428 at Appendix "A."

²²⁷ See e.g. *SS (Re)*, 2016 ABPC 170 [SS]; *DKD (Re) (Dependent Adult)*, 2018 ABQB 1021 [DKD].

²²⁸ Doazic, "Karl Lentz Arrested (Again)," online (video): <www.youtube.com/watch?v=AtasRGDhSTA>.

²²⁹ See e.g. *R v d'Abadie*, 2016 SKQB 101, aff'd 2016 SKCA 72, leave to appeal to SCC refused, 37507 (28 September 2017); *SS, ibid*; *Taraba v Erwin*, 2017 ONSC 5788; *DKD, ibid*; *Lemay v Steele*, 2019 ABQB 202, actions struck out 2019 ABQB 304, court access restrictions imposed 2019 ABQB 429; *Alberta Treasury Branches v Hawrysh*, 2019 ABQB 566; *Yaremkevich, supra* note 226, action struck out 2020 ABQB 175; *Babb, supra* note 21; *Watchel v British Columbia*, 2019 BCSC 1087, aff'd 2020 BCCA 100, leave to appeal to SCC refused, 39310 (17 December 2020); *Dennett v Gilbert*, 2020 ONSC 6865, action struck out 2020 ONSC 7455; *Parhar v British Columbia (Attorney General)*, 2021 BCSC 700 [*Parhar*]; *Ossowski, supra* note 226, action struck out 2021 ABQB 428, costs imposed 2021 ABQB 456; *Bluerobin Inc v Kilian*, 2023 ONSC 3391.

²³⁰ *KPL v Alabama State Board of Human Resources*, 2:06-cv-00942-MEF (MD Ala 2006); *Lentz v Alabama*, 2:07-cv-641-WHA (MD Ala 2007); *Lentz v Bentley*, 2:21-cv-1014-MHT (MD Ala, Northern Div 2012); *Lentz v Department of Human Resources*, 2:13-cv-387-MEF (MD Ala, Northern Div 2013). *R v Zombori*, 2013 BCSC 2461.

²³² *Lentz v Sheetz*, 5:20-cv-00005-MFU (WD Virginia, Harrisonburg Div 2020).

²³³ Online: <awarriorcalls.com/corrupt-bc-service-corp/>; <awarriorcalls.com/parhar-court/>; <awarriorcalls.com/april-16th-2021-trespass/>; <awarriorcalls.com/trespass-case-5/>.

²³⁴ *Parhar, supra* note 229.

Subsequently, the Law Society of British Columbia on 24 June 2021 obtained an injunction prohibiting Pritchard, self-declared “counsellor at law,”²³⁵ from the unlicensed practice of law in British Columbia.²³⁶ Pritchard responded with a “Living Testimony in the Form of an Affidavit” that made Strawman Theory claims, complained of “Trespass[sing],” “trafficking in persons,” and said no contract exists that binds Pritchard’s actions.²³⁷ Parhar died in late 2021 after rejecting a COVID-19 diagnosis “because CONVID ... doesn’t exist.”²³⁸

Pritchard’s known litigation customers are diverse, and include:

1. a mother’s litigation against authorities in relation to a mentally ill adult child,²³⁹
2. the owner of a tattoo business conducting Lentzian “do-it-yourself” proceedings in the “James Court” against multiple Canadian officials, including Chief Justice Wagner, in retaliation for pandemic management steps;²⁴⁰
3. retaliatory Lentzian trespass procedures for disciplinary proceedings conducted against Ontario Provincial Police officer Gabriel Gilles Proulx, who engaged in pandemic denial activities;²⁴¹
4. Lentzian “do-it-yourself” court processes by a restaurant owner to block an injunction to enforce pandemic management steps;²⁴² and
5. a COVID-19 “scamdemic” activist charged with criminal harassment after confronting the Peterborough, Ontario medical officer of health at the doctor’s residence.²⁴³

²³⁵ Bethany Lindsay, “Pseudolegal ‘Expert’ Banned from Acting as a Lawyer in B.C. Courtrooms,” *CBC* (15 July 2021), online: <cbc.ca/news/canada/british-columbia/pseudolegal-expert-banned-from-acting-as-a-lawyer-in-b-c-courtrooms-1.6103427>.

²³⁶ *Law Society of British Columbia v Pritchard* (24 June 2021), Vancouver S-214411 (BC SC).

²³⁷ Online: <awarriorcalls.com/pdfs/LTA.Christopher.James.May.28th.2021.pdf>.

²³⁸ Simon Little, “Outspoken B.C. COVID-denier Mak Parhar Dies, Coroner Investigating,” *Global News* (4 November 2021), online: <globalnews.ca/news/8351684/bc-covid-denier-mak-parhar-dies-coroner-investigating/>.

²³⁹ *Davidson v Alberta Health Services*, 2021 ABQB 886, litigation struck as an abuse of process 2021 ABQB 942; “Michele Davidson,” online: <awarriorcalls.com/michele-davidson/>; <awarriorcalls.com/pdfs/Redacted.Trespass.Notice.Gabriel.Davidson.Monday.Oct.4.2021.pdf>.

²⁴⁰ “James Russo,” online: <awarriorcalls.com/james-russo/>; “Trespass Case #8,” online: <awarriorcalls.com/trespass-case-8/>; <awarriorcalls.com/pdfs/russo/REDACTED-James.Court.Claim.Filing.December.9.2021.pdf>; “Living Testimony in the Form of an Affidavit,” online: <awarriorcalls.com/pdfs/russo/LTA-Jamie.Russo.December.9th.2021.Final.pdf>; online: <awarriorcalls.com/pdfs/russo/REDACTED-November.9th.2021.Chief.Justices.Court.No.380999210270.Final.Notice.pdf>.

²⁴¹ “Case #10: Gabriel Proulx,” online: <awarriorcalls.com/case-10-gabriel-proulx/>; “Notice Trespass,” online: <awarriorcalls.com/pdfs/Notice.Trespass.OPP.File.Number.2545021-0051.September.13.2021.redac.pdf>; online: <awarriorcalls.com/pdfs/Notice.Malfesance.October.15th.2021.Redacted.pdf>.

²⁴² *Vancouver Island Health Authority v Giannikos*, 2021 BCSC 957.

²⁴³ The activist in question, Christine Massey, has published documents that establish Pritchard’s direct involvement (online: <fluoridefreepeel.ca/wp-content/uploads/2022/04/NoticewAttachmentsEmailsCoercedAppearanceApril.12.2022-redacted.pdf>). Massey appears to also be engaged in pseudolegal based attacks on court and crown actors (online: <fluoridefreepeel.ca/notice-to-man-stuart-w-konyer-and-man-woman-acting-as-clerk/>). Massey’s activities have attracted some media reporting (kawarthaNOW, “Police Arrive at Home of Peterborough Medical Officer of Health Dr. Thomas Piggott Wednesday Night,” *kawarthaNOW.com* (20 January 2022), online: <kawarthanow.com/2022/01/20/police-arrive-at-home-of-peterborough-medical-officer-of-health-dr-thomas-piggott-wednesday-night/>). The Federal Court of Canada has rejected Massey as an expert in biostatistics during proceedings that challenged COVID-19 pandemic mitigation steps: *Lucien Khodeir v Attorney General of Canada*, 2022 FC 44 at paras 53–56.

This litigation, and Pritchard's online activities and website, illustrate how Pritchard characterizes his pseudolegal services as a method to resist (purported) illegal and malevolent state activity, and conspiratorial hidden hands who have (allegedly) sought to crush individual rights under the auspice of the COVID-19 "scamdemic." Pritchard is openly anti-Semitic, endorsing Nation of Islam claims that "Satanic Jews" control international banking.²⁴⁴ Pritchard also has links to US right-wing extremist and QAnon media circles,²⁴⁵ and Canadian militia-style organizers.²⁴⁶

Pritchard has personally attempted to conduct Lentzian "do-it-yourself" court proceedings in several Ontario court actions with Michael Sekulovski. One lawsuit,²⁴⁷ retaliating against judges and lawyers after an estate dispute,²⁴⁸ was dismissed by the Ontario *Rule 2.1* "show-cause" triage procedure.²⁴⁹ Sekulovski and Pritchard were ordered to pay \$9,292.07 in costs.²⁵⁰ Subsequently, Justice Myers struck out a second Sekulovski and Pritchard lawsuit under *Rule 2.1*.²⁵¹ A reported judgment reproduces Pritchard's Lentzian reply that threatened Justice Myers: the justice's "ignorance will not be tolerated in law [not legal]; ... Legal does not apply to a man or woman the supremacy of God is the law [common] on land."²⁵² Justice Myers denounced this pseudolaw litigation, and responded "[t]his type of gibberish is abusive on its face. Its purpose is to clog the courts and make people waste time."²⁵³

In most ways Pritchard is a typical, albeit enthusiastic, pseudolaw guru: an unimaginative promoter who has targeted a vulnerable and stressed population using long-rejected retread pseudolaw invented by somebody else. The unexpected aspect of Pritchard's activities is Pritchard has maintained any marketplace credibility given his reported public failures, including multiple published court decisions.

The best explanation is Pritchard has tapped a virgin potential customer pool. Notably, none of Pritchard's identified customers have any links to earlier Canadian pseudolaw groups, like the Freeman and Detaxers. Instead, Pritchard has targeted a novel and likely expanding population of motivated anti-state actors: the pandemic and vaccine resister and skeptic communities. Pseudolaw is new to Pritchard's target market, and so he attracts unsophisticated adherents less likely to detect Pritchard's falsehoods. If correct, that creates a finite end point for Pritchard's guru career. Like the now defunct Freeman, Pritchard's clientele will learn by negative conditioning, and very likely soon abandon both pseudolaw, and Pritchard, personally.

²⁴⁴ "Louis Farrakhan," online: <awarriorcalls.com/louis-farrakhan/>.

²⁴⁵ Peter Smith, "Canadian Police Officer Following Fringe Legal Philosophy Appears Alongside US QAnon Influencer" (7 October 2021), online (blog): *Canadian Anti-Hate Network* <antihate.ca/canadian-police-officer-following-fringe-legal-philosophy-appears-alongside-us-qanon-influencer>.

²⁴⁶ Canadian Anti-Hate Network, "Sovereign Citizens Attempting to Organize Occupation of Courthouse" (3 June 2022), online (blog): *Canadian Anti-Hate Network* <antihate.ca/sovereign_citizens_attempting_to_organize_occupation_of_courthouse>; Justin Ling, "Conservative MPs Met With Anti-Vaccine Leaders Inside Parliament as Convoy Plans to Return to Ottawa," *Vice* (22 June 2022), online: <vice.com/en/article/y3pz7x/conservative-mps-anti-vaccine-convoy-ottawa>.

²⁴⁷ *Sekulovski v Arkin*, 2021 ONSC 1401 [*Sekulovski*]; "Notice: Liability," online: <awarriorcalls.com/pdfs/Sekuloski.Court.Filing.CV-20-00002184-0000.Redacted.Sept.12.2020.pdf>.

²⁴⁸ *Sekulovski, Estate Of* (6 January 2020), 05-141/19 (Ont Sup Ct J); *Sekulovski v Georgiou*, 2022 ONSC 1819.

²⁴⁹ *Rules of Civil Procedure*, RRO 1990, Reg 194, s 2.1.

²⁵⁰ *Sekulovski*, *supra* note 247.

²⁵¹ *Sekulovsky v Maisonneuve*, 2021 ONSC 1418.

²⁵² *Ibid* at para 3.

²⁵³ *Ibid* at para 4.

B. DANIEL TERRY LOZINIK: “ANGELIC LAW”

Daniel Terry Lozinik, “private sovran attorney general,” is a resident of Calgary, Alberta, and a comparatively new Canadian pseudolaw guru who has since 2019 operated the “Angelic Law ... boutique law firm.”²⁵⁴ Lozinik’s first identified pseudolaw litigation was a 2015 Alberta Court of Queen’s Bench action where Lozinik sued 62 named defendants for \$30.5 billion “payable in U.S. Treasury Bills,” alleging fraud, intellectual property “[m]isrepresentation,” and “[c]onspiring to maintain a Tax Act and Tax Code that remains unlawful and illegal.”²⁵⁵

Lozinik’s website and recent pseudolaw documents continue that tax-oriented focus; Lozinik claims that allodial property status trumps government authority, at least in relation to taxation. That said, Lozinik’s advertised expertise is much broader: debt elimination, criminal get out of jail free cards, and intellectual property services.²⁵⁶ Lozinik advances a variation of Strawman Theory that grants special status to “sovereign people.”²⁵⁷ No identified Lozinik litigation involves pandemic-related issues.

The extent of Lozinik’s marketplace presence is unclear. Like Pritchard, Lozinik directly engages court and legal processes, personally. That has not proven effective for either him or his “clients.” The British Columbia Supreme Court imposed an injunction prohibiting Lozinik from engaging in unlicensed legal services.²⁵⁸ In Alberta, Associate Chief Justice Rooke reports Lozinik has unsuccessfully attempted to sabotage Alberta criminal proceedings, and was ejected from court on that basis.²⁵⁹ Associate Chief Justice Rooke indicates Lozinik has been “retained” by Sandra Ann Anderson, a very active and persistent Alberta pseudolaw litigant, who, among other things, faces criminal and customs charges for international horse smuggling.²⁶⁰ Anderson subsequently was made subject to court access restrictions as a vexatious litigant, in part for her and Lozinik’s activities,²⁶¹ then highly unusual filing gatekeeping,²⁶² that Anderson immediately breached, resulting in a \$40,000 fine.²⁶³ Anderson has appeared along with Lozinik in recent Angelic Law videos, also operating as a pseudolaw promoter.²⁶⁴

²⁵⁴ *Anderson (Re)*, 2022 ABQB 35 at para 16. Lozinik’s earliest known pseudolaw activities date to 2015 (“TAX is SIN,” online: <[youtube.com/channel/UCXgB0AgE9dtr_Oe83umi4Rg](https://www.youtube.com/channel/UCXgB0AgE9dtr_Oe83umi4Rg)>).

²⁵⁵ *Lozinik v Whitt* (20 February 2015), Calgary 1501 02016 (Alta QB) (Statement of Claim), action struck out *Lozinik v Whitt* (26 March 2015), Calgary 1501 02016 (Alta QB) (Order).

²⁵⁶ “Services,” online: <angeliclaw.com/services>.

²⁵⁷ This 2022 undated “Notice of Demand” is a more complex but representative example of Lozinik’s filings, online: <mediafire.com/file/5anjacumclepg66/Daniel_Terry_-_NOTICE_OF_DEMAND_-_August_14_2022.pdf>. Other documents are published on the *Angelic Law* website, online: <angeliclaw.com/documents.html>.

²⁵⁸ *Law Society of British Columbia v Lozinik* (26 January 2021), Vancouver S-2011132 (BCSC).

²⁵⁹ *Anderson (Re)*, *supra* note 254 at para 16. Lozinik also at one point posted a video of this encounter: Arty’s Corporate Fiction, “Friday Open Bar | Canadian SovCit Update + Quantum Syntax in Traffic!” (19 November 2021) at 00h:35m:30s, online (video): <[youtube.com/watch?v=AcoM0AACNmM](https://www.youtube.com/watch?v=AcoM0AACNmM)>.

²⁶⁰ *Anderson (Re)*, *ibid*; *Ossowski, supra* note 226; *Canada (Attorney General) v Anderson*, 2022 ABQB 135; *Royal Bank of Canada v Anderson*, 2022 ABQB 354.

²⁶¹ *Canada (Attorney General) v Anderson*, 2022 ABQB 310. Anderson is probably also a (former) customer of Pritchard.

²⁶² *Royal Bank of Canada v Anderson*, 2022 ABQB 525.

²⁶³ *Royal Bank of Canada v Anderson*, 2022 ABQB 577.

²⁶⁴ Angelic Law, “The Truth About Tax Part 1” (1 December 2021), online (video): <[youtube.com/watch?v=ocGbtm2We8](https://www.youtube.com/watch?v=ocGbtm2We8)>; Angelic Law, “The Truth About Tax Part 2” (1 December 2021), online (video): <[youtube.com/watch?v=z-xPVajkvTY](https://www.youtube.com/watch?v=z-xPVajkvTY)>.

Lozinik is personally facing criminal proceedings in Alberta, where he is charged with obstruction, mischief, and unauthorized possession and careless use of firearms.²⁶⁵ Lozinik has also engaged in unsuccessful conventional litigation. For example, in 2012, Lozinik sued investors, but most of that action was dismissed.²⁶⁶ A \$100 billion lawsuit against Lozinik's landlords was struck out in 2016.²⁶⁷ Little else is known of Lozinik's background, beyond that he is an inventor. In 2009, Lozinik filed a US "back scrubbing device" patent application that was subsequently abandoned.²⁶⁸

C. DĪEVERGENT5 AND DARREN CLIFFORD

"Dievergent5" (pronounced "Divergents") is an international movement that appears to have originated in Australia circa 2021. Dievergent5's materials make vague promises of a life free of the "old system" and "dark forces."²⁶⁹ The Dievergent5 website points to resources²⁷⁰ based on John Spirit's international treaty/*Charter* scheme,²⁷¹ and videos that describe classic Sovereign Citizen Strawman Theory where "equity" is purportedly the highest form of law.²⁷² Dievergent5 membership in Canada is, at most, in the low hundreds.²⁷³

Dievergent5 exhibits two unusual characteristics. One is that Dievergent5 is an extreme manifestation of the New Age subclass of pseudolaw groups. Dievergent5 "KinderGardēn Schööl"²⁷⁴ and "Di5 Elēmental School" resources²⁷⁵ describe paranormal and religious concepts and rituals, such as how to take a "Moon Bath."²⁷⁶

Dievergent5's second noteworthy characteristic is Darren Clifford's involvement.²⁷⁷ Clifford is the younger sibling of "muscular Freemanist" guru Dean Clifford. Though Darren Clifford was a comparatively minor personality in the Freeman-on-the-Land movement, he is the pseudolaw guru figure and theorist for Dievergent5. The Cliffords now explicitly claim they employ different pseudolaw methodologies,²⁷⁸ with Darren Clifford and Dievergent5 operating inside "a system of commerce."

²⁶⁵ *R v Lozinik*, Calgary 220198949P1 (Alta CJ).

²⁶⁶ *Lozinik v Sutherland*, 2012 ABQB 440, costs awarded 2012 ABQB 583.

²⁶⁷ *Lozinik v Swire Group Inc* (13 May 2016), Calgary 1601 02618 (Alta QB) (Order).

²⁶⁸ Daniel T Lozinik, "Back Scrubbing Device and Method of Manufacturing Same," online: *Patentdocs* <patentsencyclopedia.com/app/20090255080>.

²⁶⁹ Online: *Dievergent5* <dievergent5.com>; replacement website formerly located at <new.dievergent5.org>.

²⁷⁰ Online: <iyoutome.com/supremelaw/>.

²⁷¹ Netolitzky, "History #2," *supra* note 2 at 822–23.

²⁷² See e.g. Dievergent5, "Di5 Live - Questions & Answers ~ Part I" (8 February 2022), online (video): <youtube.com/watch?v=8xGW4c5SAYM>; Dievergent5, "Di5 Live - Questions & Answers ~ Part II" (9 February 2022), online (video): <www.youtube.com/watch?v=6c9djozipJA>.

²⁷³ Based on registered group members (online: *Dievergent5* <dievergent5.com>) and the low number of Internet video views ("Dievergent5," online: <youtube.com/channel/UCwCfGc-c9NuZqYmeMQiS6xQ/videos>).

²⁷⁴ Online: <youtube.com/channel/UCcml1aYnAbzNcRZPZ5GU_hw/>.

²⁷⁵ Online: <facebook.com/dievergent5elementalschool/>.

²⁷⁶ "Ritual #6 - Moon Bath Ritual" (16 February 2022), online: <facebook.com/dievergent5elementalschool/photos/pcb.145157081262474/145157021262480>.

²⁷⁷ "Intercessor-Humanity Heir," online: <facebook.com/darren.clifford.756>.

²⁷⁸ Formerly located at RICE TVx, "STF: #Trust & #Equity #Law Roundtable Live Discussion #2 (4.15.2021)" (15 April 2021), online: <youtube.com/watch?v=iPNEv6_Po4c>.

Dievergent5 and Clifford appear to be engaged in pseudolaw document²⁷⁹ and court processes,²⁸⁰ but, to date, those are not linked to reported Canadian jurisprudence or identified litigation.

D. CAPE BRETON REICHSBÜRGERS

One of the stranger manifestations of pseudolaw in Canada is the appearance of a population of German Reichsbürgers in Cape Breton, Nova Scotia. Reichsbürgers are pseudolaw adherents who reject the Federal Republic of Germany as the valid German government. While most Reichsbürgers engage pseudolaw to argue a different Germany is the true nation state, some Reichsbürgers have escaped “German tyranny” by relocating to “free” countries.²⁸¹ One such colony emerged in Cape Breton, circa 2020.²⁸²

Frank Eckhardt, the central promoter of the Reichsbürger Cape Breton “Eco Village,”²⁸³ has been arrested by Canadian authorities over complaints from other German emigrés and firearms-related matters.²⁸⁴ Whether or how pseudolaw may become a factor in this emerging dispute is anyone’s guess.

VII. CANADA AND THE INTERNATIONAL PSEUDOLAW PHENOMENON

The modern US-sourced form of pseudolaw has now operated as a low order infestation in the Canadian legal apparatus for over two decades. Pseudolaw will, in all likelihood, still be encountered by judges, lawyers, and unfortunate target litigants in the decades to come.

Pseudolaw is not going away. Cocooned safely within the cultic milieu, pseudolaw’s spores will continue to drift out and infect susceptible persons and groups that harbour marginal, anti-authority conspiratorial beliefs. However, the failure of pseudolaw to expand broadly in Canada during the past several years, despite near ideal crisis conditions, strongly suggests Canadian society is an ill-suited host for these ideas. We are very lucky for that. In any case, immunity to this disease of ideas will develop over time. For example, the COVID-19 pandemic resister and skeptic communities are now learning the hard way that pseudolaw

²⁷⁹ Dievergent5, “5urprise Present5” (17 February 2022), online: <facebook.com/dievergent5/posts/344056184393731>.

²⁸⁰ Dievergent5, “So How Did Court Go Today...” (27 April 2021), online: <facebook.com/dievergent5/posts/142518511214167>.

²⁸¹ Buchmayr, *supra* note 28 at 111, see also Florian Schäfer, “‘Goodbye Germany’ - Der ‘patriotische Kampf’ aus dem Ausland,” *Endstation Rechts* (20 May 2022), online: <endstation-rechts.de/news/goodbye-germany-der-patriotische-kampf-aus-dem-ausland>.

²⁸² National Post Staff, “Nazi Sympathizer Network Buying up Cape Breton Properties with ‘Colony’ in Mind: German Report,” *National Post* (24 July 2020), online: <nationalpost.com/news/nazi-sympathizer-network-buying-up-cape-breton-properties-with-colony-in-mind-german-report/wcm/05024cf8-c014-47c3-8bd3-2270456aac5a/amp/>.

²⁸³ Online: <capebretonecovillage.ca>.

²⁸⁴ Joan Baxter, “Controversial Cape Breton Land Seller Frank Eckhardt Arrested for the Second Time in Just Two Weeks, This Time on a Slew of Weapons Charges,” *Halifax Examiner* (31 December 2021), online: <halifaxexaminer.ca/featured/controversial-cape-breton-land-seller-frank-eckhardt-arrested-for-the-second-time-in-just-two-weeks-this-time-on-a-slew-of-weapons-charges/>; Tom Ayers, “German Immigrants Afraid After Cape Breton Man Handed Extortion, Weapons Charges,” *CBC* (19 January 2022), online: <cbc.ca/news/canada/nova-scotia/german-immigrants-afraid-after-cape-breton-man-charged-1.6319215>; Joan Baxter, “Controversial Cape Breton Land Seller Frank Eckhardt to Appear in Court in April on Weapons Charges, Pleads not Guilty to Extortion Charge,” *Halifax Examiner* (1 March 2022), online: <halifaxexaminer.ca/featured/controversial-cape-breton-land-seller-frank-eckhardt-to-appear-in-court-in-april-on-weapons-charges-pleads-not-guilty-to-extortion-charge/>.

is a false narrative, and magic pseudolaw paperwork provides no benefits. History shows these people will probably abandon pseudolaw and turn to different alternatives.²⁸⁵

That said, as long as uninfected Canadian candidate host populations exist, or emerge, additional bursts of pseudolaw-based action and litigation are not merely plausible, but inevitable. The cultic milieu is a highly efficient mechanism to introduce and expose pseudolaw to those who hold marginal beliefs and engage anti-authority perspectives.²⁸⁶

A closer review of how pseudolaw has operated during the COVID-19 pandemic offers insights into the characteristics of Canada's pseudolaw phenomena, and its potential limits.

A. THE COVID-19 PANDEMIC

Pseudolaw has expanded in Canada during the COVID-19 pandemic, chiefly into populations that resisted government efforts to mitigate that disease, including anti-vaccination circles, and, generally, among persons who subscribe to the improvisational millennialist super-conspiracy.²⁸⁷ The same happened in other countries. Splitting out pseudolaw affiliates from other anti-authority conspiratorial activists is probably impossible. A broader process is underway. The *CSIS 2020 Public Report* accurately observes the COVID-19 pandemic has “exacerbated xenophobic and anti-authority narratives,” linking this development to conspiracy theory beliefs held by centralized extremist networks.²⁸⁸

Pseudolaw is an integrated component of a larger conspiratorial anti-authority matrix.²⁸⁹ Pseudolaw aggravates the potential for conflict that has bubbled up during the present pandemic.²⁹⁰ Pseudolaw promises illusionary authority: a right to “fight back,” with the law on your side. The empowerment promised by pseudolaw is extremely appealing to marginal and angry anti-authority actors.

No good metrics exist to evaluate where Canada falls among western common and civil law tradition nations during this period. Pseudolaw groups and activity are notoriously difficult to measure.²⁹¹ That said, there are reasons to believe Canada has gotten off

²⁸⁵ See e.g. the Detaxer and Freeman-on-the-Land populations in Canada: Netolitzky, “History #2,” *supra* note 2 at 814–20.

²⁸⁶ Netolitzky, “Itch,” *supra* note 5 at 185–86.

²⁸⁷ See Barkun, *supra* note 165; e.g. Bethany Lindsay, “As Anti-Tax Guru’s Fines Go Unpaid, His Bogus Ideas Are Revived in COVID-19 Conspiracy Circles,” *CBC* (11 March 2021), online: <cbc.ca/news/canada/british-columbia/bc-russell-porisky-pseudolegal-theories-anti-mask-1.5943082>; Chris Walker, “Bizarre Legal Theory Making Anti-Vaccine Movement More Extreme, Experts Warn,” *CBC* (24 September 2021), online: <cbc.ca/news/canada/british-columbia/anti-vaccine-pseudolegal-freemen-on-the-land-1.6188648>; Joseph Breaun, “Canadian Divorce Courts Come down Hard on Anti-vaccine Parents Who Deny Covid-19 Pandemic,” *National Post* (21 December 2021), online: <nationalpost.com/health/canadian-divorce-courts-come-down-hard-on-anti-vaccine-parents-who-deny-covid-19-pandemic>; Marg Bruineman, “‘Pseudo-Law’ Increasingly Used to ‘Assert Rights’ to Oppose Pandemic Rules, Observers Say,” *OrilliaMatters* (16 April 2021), online: <orilliamatters.com/local-news/pseudolaw-increasingly-used-to-assert-rights-to-oppose-pandemic-rules-observers-say-3639152>.

²⁸⁸ Canadian Security Intelligence Service, *CSIS Public Report 2020*, Catalogue No PS71E-PDF (Public Works and Government Services Canada, 2021) at 26–27, online: *CSIS* <canada.ca/content/dam/csis-scsr/documents/publications/2021/CSIS-Public-Report-2020.pdf>.

²⁸⁹ Daniel Baldino, “The International Blueprint for Anti-Government Extremism and the Rise of the Sovereign Citizen Movements” (18 February 2022), online: *Australian Institute of International Affairs* <internationalaffairs.org.au/australianoutlook/the-international-blueprint-for-anti-government-extremism-and-the-rise-of-the-sovereign-citizen-movements/>.

²⁹⁰ Netolitzky, “Itch,” *supra* note 5.

²⁹¹ Netolitzky, “History #2,” *supra* note 2 at 806–13.

comparatively lightly. No significant and enduring pseudolaw leader or movement has emerged since the fall of Freemanism.

Vaccine resister and “scamdemic” populations should have been the ideal, if not inevitable, hosts for pseudolaw.²⁹² Instead, this article documents that “scamdemic” communities were certainly “colonized” by pseudolaw, but never “conscripted” or “co-opted.” Pseudolaw activists and gurus — New Constitutionalists, Queen Didulo, Kevin Annett, the MCLR, Christopher Pritchard — all became players in the “scamdemic” phenomenon, but always remained “a fringe of a fringe.” Detaxer David Kevin Lindsay is the only pseudolaw authority who is also a populist “scamdemic” leader, at least in inland British Columbia.²⁹³

Events in January–February 2022 are useful to illustrate the apparent barriers to pseudolaw’s propagation. During this period a substantial organized attempt was made to impede government and public activity in Ottawa and certain other key government locations, and at US–Canada border crossings. This article uses the “Freedom Convoy” to identify this phenomenon.²⁹⁴ Media and analysts obviously found classifying the Freedom Convoy difficult. A right-wing thing? A hate thing? A “scamdemic” thing? A populist politics thing? A racist thing? An anti-authority thing? A class conflict thing? All these components were probably involved; the Freedom Convoy’s participants defy simple description. At this early point there is little utility in attempting to dissect out predominate characteristics and influences, and, in any case, a fact-based analysis of that complex question is beyond the scope of this article. For what it is worth, the author’s opinion is the Freedom Convoy phenomenon is better thought of as a conglomerate of different marginal and alienated populations, that together ebbed and flowed like an ocean tide, motivated by a conjunction of multiple larger external centres of gravity.

One safe conclusion is the Freedom Convoy was not “a pseudolaw thing.” Pseudolaw elements were in play, but these were more “flotsam carried on the waves,” rather than agents driving the overall current.

B. THE FREEDOM CONVOY

A closer look is useful. The Canada Unity website and its figurehead individuals were the nearest thing to an organizing centre for the Freedom Convoy.²⁹⁵ Initially, the Canada Unity website published a “Memorandum of Understanding” between Canada Unity, as represented by three individuals identified as “Citizens of Canada,” with Senate members and the Governor General, “the highest authorities representing the Federal Government (SCGGC) as ‘The Government of Canada.’”²⁹⁶ These players would then form the “Citizens of Canada Committee” to implement and enforce Canadian legislation and certain international treaties,

²⁹² Netolitzky, “Itch,” *supra* note 5 at 187.

²⁹³ Netolitzky, “History #2,” *supra* note 2 at 814–17.

²⁹⁴ Participants and their organizers also used this label, online: *Internet Archive* <web.archive.org/web/20220201030006/https://freedomconvoycanada.com/>.

²⁹⁵ “Canada Unity,” online: *Internet Archive* <web.archive.org/web/20220309170858/https://canada-unity.com/>.

²⁹⁶ “Introduction to the Memorandum of Understanding (MOU),” online: *Internet Archive* <web.archive.org/web/20220131005745/canada-unity.com/wp-content/uploads/2022/01/Combined-MOU-Dec03.pdf>.

and, globally, unwind pandemic mitigation processes. The “Memorandum” purported to be legally binding, and “National and International court admissible.”²⁹⁷ The “Memorandum” obtained over 320,000 signatures.²⁹⁸

Is the “Memorandum” a pseudolaw document?²⁹⁹ Not one based on US-derived pseudolaw. The “Memorandum” purports to implement a contract-like process to enforce Canadian legislation, and inaccurately recognizes and acknowledges parts of actual government and political structures as valid. Its authors are “Citizens of Canada,” neither Freeman, Sovereigns, nor “common law” humans subject to some alternative/replacement authority. Pseudolaw, at its heart, says “I have a different law — it is better and more powerful.” That competition of laws is entirely absent in the “Memorandum.” The “Memorandum” is certainly an attempt to engineer a superficially law-based process, but, accurately, the “Memorandum” is somewhere between a political manifesto, and an exercise in amateur social studies imagineering.

Subsequently, on 8 February 2022, Canada Unity: (1) “withdr[ew]” the “Memorandum” to avoid “unintended interpretations”; (2) emphasized Canada Unity’s intent to operate within Canadian constitutional limits; and (3) affirmed the *Charter* and democratic processes.³⁰⁰ The “Memorandum” may be reminiscent of pseudolaw concepts and documents. Each attempts to frame an unusual objective in “legalese” and uses a rules-based format, but these parallels are as far as the resemblance goes. The Freedom Convoy wanted to do “something legalish” in a formal, documented manner, but did not apply stereotypic pseudolaw concepts.

Another similar example where Freedom Convoy activists attempted “something legalish” is when The Line Canada³⁰¹ requested signatures for “a draft constitution to campaign for the change we all want and need.”³⁰² The draft constitution supposedly required “15% of the Canadian population by any three provinces combined, or 38% of one province.”³⁰³ No basis for this threshold was identified. No text for the constitution is provided. Instead, several points supported both direct and representative democratic processes, but also “civil[ian] oversight committees” apparently grafted onto existing governments.³⁰⁴ The Line Canada’s concept of constitutional reform was both hopelessly naive and amateur. The New Constitutionlists are vastly more sophisticated and advanced constitutional scholars and nation builders.

²⁹⁷ *Ibid.*

²⁹⁸ “Canada Unity: News Release,” online: *Internet Archive* <web.archive.org/web/20220225020901/canada-unity.com/mou/>.

²⁹⁹ George Monbiot, “There’s No Solidarity in ‘Sovereign Citizen’ Protests – Only Incoherent Rage,” *The Guardian* (16 February 2022), online: <theguardian.com/commentisfree/2022/feb/16/solidarity-sovereign-citizen-protests-ottawa-truck-blockade>; Jeffrey B Meyers, Emily Dishart & Rose Morgan, “Canada’s Legal Disinformation Pandemic Is Exposed by the ‘Freedom Convoy,’” (18 February 2022), online: <theconversation.com/canadas-legal-disinformation-pandemic-is-exposed-by-the-freedom-convoy-176522>.

³⁰⁰ “Canada Unity: Notice of Formal Withdrawal of MOU by Canada Unity,” online: *Internet Archive* <web.archive.org/web/20220209172034/https://canada-unity.com/mou/>.

³⁰¹ Online: <thelinecanada.com/>. An apparently duplicate website, *The Unified North*, has the same materials: “Unified North,” online: *Internet Archive* <web.archive.org/web/20220701104103/https://unifiednorth.com/>.

³⁰² Online: <thelinecanada.com/updates/f/draft-constitution-the-canadian-bill-of-rights>.

³⁰³ *Ibid.*

³⁰⁴ “Canadian Bill of Rights,” online: <thelinecanada.com/your-rights>.

These observations do not mean pseudolaw did not influence the Freedom Convoy phenomenon. Both Canada Unity and The Line Canada published links to genuine pseudolaw groups, CLEAR³⁰⁵ and The Myth is Canada,³⁰⁶ respectively. ASMIN contributed “PERMIT TO PARK ON UN – CEDED LANDS OF OTTAWA” documents.³⁰⁷ Some pseudolaw gurus and personalities were physically present during the Ottawa occupation: for example, Didulo³⁰⁸ and Pritchard.³⁰⁹ However, no evidence suggests these pseudolaw figures were anything but peripheral players, despite attempts to draw attention to themselves. Similarly, individual Freedom Convoy members have deployed pseudolaw language and concepts,³¹⁰ but that practice was by no means widespread. The 17 February 2023 Final Report of Justice Rouleau, the Commissioner of the Public Order Emergency Commission on the declaration of an emergency in response to the Ottawa Freedom Convoy and related protests, comes to much the same conclusion. Pseudolaw agents like Romana Didulo were “fringe actors,”³¹¹ and, instead, the Freedom Convoy phenomenon was the product of a synergy of social, political, and economic factors.³¹²

“Penetrance,” a genetics concept, is a useful way to conceptualize the relationship between pseudolaw and the Freedom Convoy. Sometimes genetic traits are carried by individuals but not physically expressed as part of the phenotype. This incomplete penetrance has many causes, including external environmental factors. For example, a person with tall height genes may not express those if starved as a child. Pseudolaw DNA was clearly present in the Freedom Convoy’s genome, but exhibited only minor penetrance, and was only slightly expressed in the Freedom Convoy’s mature form.

C. WHY PSEUDOLAW IS MARGINAL IN CANADA

So, despite: (1) nearly ideal social stress conditions; (2) a substantial activation and mobilization of marginal communities across political spectrums and throughout Canadian conspiracy cultures; and (3) an apparent interest by dissident groups in a “revolution by law,” rather than a “revolution by arms,” pseudolaw did not manage to capture a dominant, or even significant role in Canadian “scamdemic” and anti-vaccination fringe communities.

³⁰⁵ Netolitzky, “History #2,” *supra* note 2 at 814–17.

³⁰⁶ “The Freedom Convoy Canada,” online: *Internet Archive* <web.archive.org/web/20220129065751/https://freedomconvoycanada.com/>.

³⁰⁷ Dan Collen, “Memetic Warfare, Q Anon, Trolls and More: A Walk Through Protest Signs in Ottawa’s Occupation” (23 February 2022), online (blog): <dancollen.medium.com/memetic-warfare-q-anon-trolls-and-more-a-walk-through-protest-signs-in-ottawas-occupation-4ccabb9d6e99>. Interestingly, ASMIN also attempted to seize a controlling role in the 2023 Public Order Emergency Commission on responses to the Freedom Convoy, but was denied standing: “Supplementary Decision on Standing (No. 5)” (9 November 2022), online: <publicorderemergencycommission.ca/files/documents/Supplementary-Decision-on-Standing-No-5-November-9-2022.pdf>.

³⁰⁸ Leyland Cecco, Amru Salahuddien & Tracey Lindeman, “Ottawa Protests: Tensions Grow as ‘Intolerable’ Truck Blockade Paralyzes Canada Capital,” *The Guardian* (3 February 2022), online: <www.theguardian.com/discover-cool-canada/2022/feb/03/ottawa-protests-tensions-grow-truck-blockade-paralyzes-canada-capital>; PressProgress, “Meet the Extremists and Social Media Influencers at the Centre of the Far-Right Siege of Ottawa” (8 February 2022), online: <pressprogress.ca/meet-the-extremists-and-social-media-influencers-at-the-centre-of-the-far-right-siege-of-ottawa>; Operation Q, *supra* note 76; Sarteschi, “Social Phenomenon,” *supra* note 62 at I.E.

³⁰⁹ Online (video): <brighteon.com/embed/41f95300-f777-42ba-82dd-5f4f203f5d71>; <brighteon.com/embed/12096934-e0d3-4956-8fba-ecb94ace199e>.

³¹⁰ See e.g. Dan Taekema, “Rowdy Court Behaviour Part of ‘Cluster’ of Sovereign Citizen Activity,” *CBC* (2 September 2022) online: <cbc.ca/news/canada/ottawa/sovereign-citizen-movement-spread-court-freedom-convoy-1.6569509>.

³¹¹ Canada, *Report of the Public Inquiry Into the 2022 Public Order Emergency*, vol 2 (Ottawa: Public Order Emergency Commission, 2023) (Chair: Honourable Paul S Rouleau) at 87–88.

³¹² *Ibid* at 74–77.

Why? Several factors are probably implicated.

One plausible factor is the high sophistication of Canadian anti-pseudolaw jurisprudence. *Meads*³¹³ is the usual identified archetype, but more accurately *Meads* is part of a broader pattern where Canadian judges have responded to pseudolaw litigation in a systematic, principled manner.³¹⁴ That has continued post-*Meads*, particularly in decisions of the Alberta Court of King's Bench. The Canadian judiciary's active and substantive response to pseudolaw has produced the definitive rebuttals to many pseudolaw variants, including the John Spirit *Charter* and treaty scheme,³¹⁵ and MCLR claims.³¹⁶ US pseudolaw expert Colin McRoberts has highlighted these Canadian "weaponized judgments" as a critical operational advantage Canada possesses over US courts, and, generally, the US' ongoing struggle to manage pseudolaw and its adherents.³¹⁷ This factor is strengthened by the absence of novel pseudolaw, as illustrated by the New Constitutionists' improvisational millennialist recycling of 70 year old concepts out of the cultic milieu. Similarly, ten years after its release, *Meads* remains a valid, if not total, response to the large majority of pseudolaw encountered in Canada. For whatever reasons, pseudolaw is simply not evolving.³¹⁸

Perhaps equally important is that this relevant Canadian case law is accessible. The larger social impact of comprehensive public access to Canadian legal materials provided by the superb CanLII database is a subject that warrants investigation.³¹⁹ What can be said, at this point, is many pseudolaw adherents extensively access CanLII. They are, on that basis, very aware of what Canadian courts reason and conclude, and how their peers and predecessors have failed.

Public perceptions, domestic politics, and social traditions are also important. Canada, in that sense, is a bad match for pseudolaw. For example, Freeman-on-the-Land objectives were incompatible with Canadians' social consensus, unlike Sovereign Citizens who are an extension of mainstream US right-wing perspectives³²⁰ and match the "paranoid style" of US politics.³²¹ Similarly, US Moorish communities align with racial tensions in that country,³²² while US militias derive legitimacy from that nation's constitutional rights.³²³

To date, pseudolaw in Canada is affiliated with inept, undisciplined, and generally incompetent anti-authority populations. As this article and its companions illustrate, the typical Canadian pseudolaw adherent is more likely to be a criminal, economically marginal, and oriented to non-functional interests. New Age and alien abduction beliefs are not

³¹³ *Meads*, *supra* note 14.

³¹⁴ Netolitzky, "Hammer," *supra* note 72 at 1189.

³¹⁵ *Pomerleau v Canada Revenue Agency*, 2017 ABQB 123; Netolitzky, "History #2," *supra* note 2 at 822–23.

³¹⁶ *AVI #2*, *supra* note 159.

³¹⁷ Colin McRoberts, "Tinfoil Hats and Powdered Wigs: Thoughts on Pseudolaw" (2019) 58:3 Washburn LJ 637 at 664–69.

³¹⁸ Netolitzky, "Hammer," *supra* note 72 at 1182–86 examines possible explanations for the unexpectedly static state of pseudolaw theory and thought.

³¹⁹ Canadian Legal Information Institute, online: <www.canlii.org>.

³²⁰ 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] at 7, online: <calhoun.nps.edu/bitstream/handle/10945/50485/16Sep_Slater_Brian.pdf>.

³²¹ Netolitzky, "Itch," *supra* note 5 at 180–83.

³²² *Ibid* at 174.

³²³ *Ibid* at 172.

compatible with effective revolutionary action. That helps explain why pandemic-related dissent from Canadian pseudolaw communities is limited and ineffective.

Unlike the US, no major social faction in Canada is only able to potentially obtain recourse for their objectives by pseudolaw.³²⁴ For example, as previously noted, Indigenous issues have a forum: Canadian courts. If there were a Canadian analogue to US pseudolaw populations who perceive themselves as disenfranchised and silenced, that would plausibly be Canadians who believe there is an excess of rights.³²⁵ A nostalgic rights-oriented pseudolaw movement in Canada might be possible, where the objective is restoring traditional values, similar to German Reichsbürgers, and US Sovereign Citizens. To date, that alignment of backward-looking perspectives and pseudolaw has not yet occurred.

D. PSEUDOLAW AND VIOLENCE

While pseudolaw may be a marginal disruptor for Canadian society, pseudolaw beliefs do represent a significant public safety threat.

1. PSEUDOLAW CAUSES AND AMPLIFIES CONFLICT

Pseudolaw increases social conflict, and, in that sense, operates as an “adjuvant.”³²⁶ Pseudolaw aggravates and amplifies negative social interactions between marginal groups and the mainstream population, law enforcement, and government.³²⁷ That friction is always present, but pseudolaw makes it worse.³²⁸ Pseudolaw promises to level the playing field by providing illusionary authority and power. More frequent and serious confrontations result. Rob Sudy, leading Australian pseudolaw expert and former pseudolaw adherent, has described the powerful appeal of superior knowledge, and built from that, superior authority.³²⁹ This empowerment is critically important to understand pseudolaw’s appeal.

There can be no debate that violence is critical to that imagined empowerment. Pseudolaw adherents are often hateful, if not enraged. They openly dream of revenge, retribution against those they fear, despise, and resent. Some pseudolaw populations are somewhat discrete about that, but a violent subtext is almost always present.³³⁰ For example, New Constitutionalsists seek much expanded rights to personal weapons and vigilante self-defence authority. Others, like the MCLR, do not even bother with that kind of façade, and openly fantasize about bodies swaying from “The Gallows.”³³¹ Queen Didulo promises her followers that military special forces will soon target perceived “outlaws,” and Queen Elizabeth II has already been executed. This affinity toward force is not political, but broader. On social media, both leftist criminal Freemen and conservative nostalgic New Constitutionalsists

³²⁴ Slater, *supra* note 320 at 59–66, 71 observes the chronic dysfunction of US political institutions favours radical action, and the appeal of pseudolaw.

³²⁵ Angela P Harris, “Vultures in Eagles’ Clothing: Conspiracy and Racial Fantasy in Populist Legal Thought?” (2005) 10:2 Mich J Race & L 269.

³²⁶ A biological agent that amplifies and increases immune interactions: Netolitzky, “Itch,” *supra* note 5 at 167–68.

³²⁷ *Ibid* at 167–68, 179–80.

³²⁸ *Ibid* at 178–80.

³²⁹ Tom Tanuki, “Aussie Sovereign Citizens. Part I” (20 January 2022) at 00h:50m:18s, online (video): <youtube.com/watch?v=ea_7jUU489g>.

³³⁰ Netolitzky, “Attack,” *supra* note 11 at 156–71; Sarteschi, *Sovereign Citizens*, *supra* note 10 at 31–42, 66–68; Hartleb, *Lone Wolves*, *supra* note 11; Rathje, “Conspiracies,” *supra* note 11.

³³¹ Netolitzky, “Implosion,” *supra* note 93 at I.I.C.

denounce Prime Minister Justin Trudeau as a traitor, who should be held to account. The formerly self-perceived powerless direct their rage to whatever “tyrant” they identify as holding the reins.

2. PSEUDOLAW APPLICATIONS OF FORCE AND VIOLENCE HAVE RULES

Though pseudolaw is clearly linked to violence, paradoxically, when fringe actors embrace pseudolaw, that also reduces the probability of some kinds of violence.³³² Pseudolaw promises extraordinary, but *rules-based* rights. Pseudolaw imposes a type of legal structure and process, though unorthodox to external observers. That means the exercise of violence by pseudolaw adherents must be somehow justified within the framework of pseudolaw’s rules. Otherwise, a pseudolaw adherent is just another “outlaw.”

For example, commonplace pseudolaw “travelling” concepts purport that government and police have no authority to regulate or legislate people’s use of motor vehicles.³³³ Unsurprisingly, that means roadside stops of pseudolaw adherents are a common flashpoint to violence, since police are “law breakers” who have impinged on (pseudo)legal rights. That justifies “self-defence” and “discipline” of law-breakers, also known as police “policy enforcers.” Conflict and violence that flows from “travelling” is part of a broader pattern. Pseudolaw adherents are more likely to immediately escalate to violence in defensive scenarios, where “outlaws” (government and police) attempt to impinge on their purported rights, engaging “self-defence.” This pattern contributes to why law enforcement is so often the target of pseudolaw-based violence.³³⁴ Police respond to pseudolaw adherents who act illegally, and are “looking to pick a fight.”

However, more broadly, the rules-oriented character of pseudolaw theory alters how the right to violence is imagined. Many pseudolaw groups see themselves as revolutionaries on the path to replace or overthrow conventional authority, and then impose their own rules. However, unlike most revolutionaries, pseudolaw groups see law — their superior (pseudo)law — as their primary weapon, rather than firearms and explosives. They appeal to the public and go to court on that basis.

That is why both the methodology and conduct of the “duel of laws” are so important. Revolutionary violence is purportedly justified if “de facto” state authority is confronted with the truth — their “commercial” or “admiralty” law is inferior and false — and then those de facto outlaws continue to ignore the true supreme de jure “common law.” Put another way, recourse to large-scale offensive violence is plausible after the failure of (pseudo)legal processes. That means *how* pseudolaw is dismissed is critical. A court decision that only says “get lost and get out” is either admitting defeat in the “duel of laws,” or means the judge has cheated and has no answer to the truth and superiority of pseudolaw.

³³² Netolitzky, “Attack,” *supra* note 11 at 156–71; Sarteschi, *Sovereign Citizens*, *supra* note 10 at 31–42, 66–68.

³³³ Reviewed in Sarteschi, *Sovereign Citizens*, *ibid* at 9–28.

³³⁴ John McCoy, David Jones & Zoe Hastings, *Building Awareness, Seeking Solutions: Extremism & Hate Motivated Violence in Alberta* (Organization for the Prevention of Violence, 2019) at 59, 63–64, online (pdf): <preventviolence.ca/publication/building-awareness-seeking-solutions-2019-report/>; Netolitzky, “Attack,” *supra* note 11 at 189–92; Sarteschi, “Violence,” *supra* note 11.

In contrast, a court judgment that dissects and rejects pseudolaw on a substantive analytical basis not only eliminates the justification for illegal action, but also defeats the *casus belli* for recourse to violence against state, police, and law enforcement “outlaws.” Defeat during the “duel of law” subverts any potential “war of guns.”³³⁵

That law-based authority to employ force is also why the emergence of pseudolaw vigilante organs, such as fake police and pseudolaw courts, is such a significant threat factor. The appearance of vigilante — but (pseudo)legal — responses demonstrates that a pseudolaw group has concluded it has won the “war of law,” and is moving to “paper up” their future potential exercise of force. That is why swearing-in of Freedom Convoy “Canadian Common Corps of Peace Officers,”³³⁶ and Didulo’s authorizing and empowering vigilante “citizens’ arrests,” are especially alarming developments.

3. PSEUDOLAW AND LAWFARE

Now is a useful point to pause and distinguish between “pseudolaw as revolution,” and “lawfare.” Lawfare is an extension of warfare that uses litigation and courts to achieve military-type objectives.³³⁷ For example, a lawsuit to prohibit use of military sonar, purportedly to minimize harm to marine life, is also an effective attack on military intelligence gathering and operational capacity. In a broader sense, lawfare is politics, since, as Carl Von Clausewitz observed, war is “a continuation of political intercourse, carried on with other means.”³³⁸ Extending from that, lawfare is a continuation of warfare, carried on with litigation and legal means.

Is pseudolaw being used as lawfare? Sometimes yes. “Paper terrorism” tactics³³⁹ such as “fee schedules” are the clearest examples where pseudolaw is used indirectly for tactical benefit.³⁴⁰ Paper terrorism threats are intended to intimidate and disrupt legitimate legal and social processes. As such, pseudolaw as lawfare is an adjunct to revolutionary pseudolaw to impose social change and “legally” obtain extraordinary results.

4. CANADIAN PSEUDOLAW VIOLENCE

Given this context, Canada is a weak candidate for broad-based pseudolaw violence. Unlike the US, Canada has little history of vigilante actions and “revolution from below.”³⁴¹

³³⁵ Susan P Koniak, “When Law Risks Madness” (1996) 8 *Cardozo Stud L & Lit* 65 investigates these alternative mechanisms of authority.

³³⁶ Jeff Geoffries, “The Platypus: Ottawa Occupiers Are Now Swearing Each Other in as ‘Peace Officers,’” online: *Internet Archive* <web.archive.org/web/20220211010319/https://www.theplatypus.ca/2022/02/ottawa-occupiers-are-now-swearing-each-other-in-as-peace-officers/>. St-Amant et al, *supra* note 5 at II:31 attribute this activity to Freeman-on-the-Land founder and keystone guru Robert Arthur Menard. That claim appears incorrect. Neither of the persons video recorded issuing the “peace officer” oaths in Ottawa are Menard. No evidence supports any continuity between Menard’s vigilante “C3PO” group that dates to the early 2010s (see Netolitzky, “Attack,” *supra* note 11 at 155, 159) and the Ottawa 2022 events, besides the same title being used by the unauthorized vigilante “Common Law” peace officers. Orde F Kittrie, *Lawfare: Law as a Weapon of War* (Oxford: Oxford University Press, 2016).

³³⁷ Carl Von Clausewitz, *On War*, translated by Michael Howard & Peter Paret (Princeton: Princeton University Press, 1976) at 87.

³³⁹ Sarteschi, *Sovereign Citizens*, *supra* note 10 at 47–54.

³⁴⁰ Meads, *supra* note 14 at paras 507–28.

³⁴¹ Chip Berlet & Spencer Sunshine, “Rural Rage: the Roots of Right-wing Populism in the United States” (2019) 46:3 *J Peasant Studies* 480; Catherine McNicol Stock, *Rural Radicals: Righteous Rage in the American Grain* (Ithaca, NY: Cornell University Press, 1996).

John McCoy reports Alberta law enforcement estimated less than 10 percent of Freemen were personally violent.³⁴² Most Canadian pseudolaw violence has been defensive, and, to date, “common law” vigilante courts and police have not emerged in Canada as a significant factor.³⁴³ US populations that have adopted pseudolaw, such as the Sovereign Citizens, have objectives and perspectives that are extensions of accepted political belief, while that kind of extremism is uncommon and generally rejected in Canada.³⁴⁴

But that could be ending, which is one of the most worrisome aspects of the Freedom Convoy, “scamdemic” resistance, and broader social disobedience emerging in Canada. Then there is the disturbing worldwide spread of conspiracy culture, such as QAnon-style beliefs.

International bleed-over is another issue. Queen Didulo invited US radicals to become armed vigilante “duck hunters” in Canada.³⁴⁵ The now defunct Canadian-based Sovran Nations reportedly recruited from US Sovereign Citizen communities.³⁴⁶

Lone actor pseudolaw-based violence, where individuals are radicalized and empowered by pseudolaw concepts, is possible.³⁴⁷ Mass violence has become democratized, as the means for violence increasingly expand from traditional firearms and explosives, to more accessible mechanisms, such as using motor vehicles as weapons. More sophisticated anti-authority figures could use publicly available technology, such as commercial drones, to create simple “smart” weaponry.

A mass casualty event in Canada motivated or influenced by pseudolaw is probably inevitable. Our population includes an increasing number of radicalized and aggrieved individuals who draw their information and beliefs from illusory sources within the cultic milieu. Pseudolaw tells two particularly dangerous lies: (1) de facto government authority is false and a tyranny; and (2) you have a legal right to fight back in courts, or with other means. The combination of these ideas is potentially explosive.

VIII. CONCLUSION

There are many reasons why pseudolaw is a cause for concern. Pseudolaw promotes useless conflicts and disputes inside and outside courts that ruin personal finances, shatter families, and put government, law enforcement, and court actors at risk. Pseudolaw leads to no win situations.

³⁴² McCoy et al, *supra* note 334 at 62.

³⁴³ The now long defunct Sovran Nations were the notable exception: Netolitzky, “History #2,” *supra* note 2 at 828–31.

³⁴⁴ Netolitzky, “Itch,” *supra* note 5 at 180–83.

³⁴⁵ Lamoureux, “Calls,” *supra* note 82; Sarteschi, “Social Phenomenon,” *supra* note 62 at I.D. III.

³⁴⁶ Netolitzky, “History #2,” *supra* note 2 at 828–31.

³⁴⁷ Noted threat assessment expert J Reid Meloy groups pseudolaw believers with other “lone wolf” terrorist threats: J Reid Meloy, “The Lone Terrorist in the Workplace,” (16 December 2014), online: <psychologytoday.com/blog/the-forensic-files/201412/the-lone-terrorist-in-the-workplace>; J Reid Meloy & Jessica Yakeley, “The Violent True Believer as a ‘Lone Wolf’: Psychoanalytic Perspectives on Terrorism” (2014) 32 Behav Sci & L 347; Tahir Rahman, Lingjin Zheng & J Reid Meloy, “DSM-5 Cultural and Personality Assessment of Extreme Overvalued Beliefs” (2021) 60 Aggression & Violent Behavior 1.

Modern pseudolaw manifests within a larger conspiratorial matrix that promotes ineffective and illegal social rebellion. Pseudolaw predisposes people down negative life paths. To what degree? Sometimes that is hard to tell.

For example, Las Vegas mass shooter Stephen Paddock was very likely exposed to and influenced by pseudolaw.³⁴⁸ Did Paddock in 2017 kill 61 people because of those beliefs? Probably not. Strawman Theory and rejection of state authority are an unnatural motive to shoot up a country music festival. But Paddock's conduct makes a little more sense when one recognizes that pseudolaw is not encountered in isolation, but naturally manifests as part of a larger set of conspiratorial, ungrounded, fearful, paranoid, and hate-driven beliefs. With Paddock, that larger matrix led to sudden and extraordinary violence. And, in that sense, pseudolaw played its part.

To use a biological analogy, pseudolaw is not the cancer, but a contributing carcinogen that leads to many negative events and outcomes. That is why pseudolaw should be studied, monitored, and, ideally, suppressed. Nothing good has come of it, and nothing ever will.

³⁴⁸ Jason Wilson, "New Documents Suggest Las Vegas Shooter Was Conspiracy Theorist: What We Know," *The Guardian* (19 May 2018), online: <[theguardian.com/us-news/2018/may/19/stephen-paddock-las-vegas-shooter-conspiracy-theories-documents-explained](https://www.theguardian.com/us-news/2018/may/19/stephen-paddock-las-vegas-shooter-conspiracy-theories-documents-explained)>.

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