Court File No.: T-1620-17

FEDERAL COURT

BETWEEN:

Dr. David Kattenburg

Applicant

and

Minister of Health,
Minister of Agriculture and Agri-Food
Minister of Foreign Affairs
Minister of International Trade

Respondents

APPLICATION UNDER SECTION 18.1 OF
THE *FEDERAL COURTS ACT* (R.S.C., 1985, C. F-7)

NOTICE OF APPLICATION

TO THE RESPONDENTS:

A PROCEEDING HAS BEEN COMMENCED by the Applicant. The relief claimed by the Applicant appears on the following pages.

THIS APPLICATION will be heard by the Court at a time and place to be fixed by the Judicial Administrator. Unless the Court orders otherwise, the place of hearing will be as

requested by the Applicant. The Applicant requests that this application be heard at Toronto.

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or a solicitor acting for you must file a notice of appearance in Form 305 prescribed by the *Federal Courts Rules* and serve it on the Applicant's solicitor or, if the Applicant is self-represented, on the Applicant, WITHIN 10 DAYS after being served with this notice of application.

Copies of the *Federal Courts Rules*, information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO OPPOSE THIS APPLICATION, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU.

Date: October 24, 2017

Issued by: _____
Registry Officer

Address of local office:
Federal Court, 200 – 180 Queen Street West, Toronto, ON M5W3L6

TO: **Minister of Health**
70 Columbine Driveway
Tunney's Pasture
Postal Location 0906C
Ottawa, ON K1A-0K9
c/o **Department of Justice**
Ontario Regional Office
3400– 130 King Street West, Box 36
Toronto, ON M5X-1K6

Minister of Agriculture and Agri-Food
174 Stone Road West
Guelph, Ontario N1G 4S9
c/o **Department of Justice**
Ontario Regional Office
3400 – 130 King Street West, Box 36
Toronto, ON M5X-1K6

Minister of Foreign Affairs
Global Affairs Canada
Lester B. Pearson Building
125 Sussex Drive
Ottawa, Ontario, Canada K1A 0G2
c/o **Department of Justice**
Ontario Regional Office
3400 – 130 King Street West, Box 36
Toronto, ON M5X-1K6

Minister of International Trade
Global Affairs Canada
Lester B. Pearson Building
125 Sussex Drive
Ottawa (Ontario) K1A 0G2
c/o **Department of Justice**
Ontario Regional Office
3400 – 130 King Street West, Box 36
Toronto, ON M5X-1K6

Application

This is an application for judicial review in respect of a decision of the Canadian Food Inspection Agency ("CFIA") to permit the importation and sale in Canada of falsely labelled wines produced in Israel's unlawful West Bank settlements.

On March 31, 2017, Dr. David Kattenburg (the "Applicant") lodged with the CFIA a written complaint relating to certain wines that are produced entirely in Israel's illegal West Bank settlements but that are falsely labelled as "Product of Israel" (the "Settlement Wines"). The West Bank forms part of the Occupied Palestinian Territories ("OPT") and does not form part of the State of Israel.

On or about July 6, 2017, in response to the Applicant's March 31, 2017 complaint, the CFIA advised the Liquor Control Board of Ontario ("LCBO") by letter that "Product of Israel" would not be an acceptable country of origin declaration for wine products that are made from grapes that are grown, fermented, processed, blended and finished in the West Bank occupied territory and that, as such, wine products from this region that are labelled as "Product of Israel" would not be acceptable and would be considered misleading as per Section 5(1) of the *Food and Drugs Act*, R.S.C., 1985, c. F-27 (the "*FDA*"). The CFIA's July 6, 2017 letter to the LCBO is referred to hereinafter as the "July 6 Directive."

Accordingly, by letter dated July 11, 2017, the LCBO requested that all sacramental wine vendors in Ontario discontinue, until further notice, the importation and sale of products from the West Bank labelled as "Product of Israel."

On July 13, 2017, however, the CFIA posted a notice on its website announcing

that it was rescinding the July 6 Directive. That notice stated as follows:

> The Canadian Food Inspection Agency (CFIA) regrets the outcome of the wine labelling assessment which led to the Liquor Control Board of Ontario's (LCBO) response regarding products from two wineries labelled as "Product of Israel".
>
> In our assessment, we did not fully consider the *Canada-Israel Free Trade Agreement* (CIFTA).
>
> Further clarification of the CIFTA (Article 1.4.1b) indicates that these wines adhere to the Agreement and therefore we can confirm that the products in question can be sold as currently labelled.
>
> The CFIA will be following up with the LCBO to correct our original response.

On August 6, 2017, the Applicant filed an appeal with the CFIA's Complaints and Appeals Office ("CAO"). In his appeal, he requested that the CFIA restore and enforce the July 6 Directive (the "Appeal").

On September 28, 2017, the CAO advised the Applicant by telephone that it had completed its review of the Appeal and that the CFIA had decided to stand by its decision to rescind the July 6 Directive. In the course of communicating to the Applicant the results of its review, the CAO revealed to him that the CFIA's decision to rescind the July 6 Directive was based on advice that the CFIA had received from the Minister of Foreign Affairs and the Minister of International Trade as to the meaning and effect of the *Canada-Israel Free Trade Agreement* ("*CIFTA*") and that, with regard to the meaning and effect of *CIFTA*, the CFIA had elected to defer to the Minister of Foreign Affairs and the Minister of International Trade.

The Applicants now makes application for:

1. An order declaring unlawful the CFIA's decision to permit the importation and sale in Canada of Settlement Wines labelled as "Product of Israel";

2. An order declaring that neither *CIFTA* nor the *Canada-Israel Free Trade Agreement Implementation Act*, S.C. 1996, c. 33 ("*CIFTA Act*"), authorizes products made in the OPT to be labelled as "Product of Israel";
3. An order declaring that, insofar as Settlement Wines are labelled as "Product of Israel," Settlement Wines violate section 5(1) of the *FDA*;
4. An order declaring that, insofar as Settlement Wines are labelled as "Product of Israel," Settlement Wines violate section 7 of the *Consumer Packaging and Labelling Act*, R.S.C., 1985, c. C-38 (the "*CPLA*");
5. An order declaring that the CFIA's decision to permit the importation and sale in Canada of Settlement Wines labelled as "Product of Israel" violates the *Geneva Conventions Act*, R.S.C., 1985, c. G-3 (the "*GCA*"), as well as Canada's obligations as a party to the *Fourth Geneva Convention* and the *United Nations Charter*;
6. Costs; and
7. Such further and other relief as this Court deems just.

The grounds for the Application are:

The Parties

1. The Applicant is a resident of Winnipeg, Manitoba who is a science educator, a freelance journalist and human rights activist. Dr. Kattenburg is a regular consumer of wines who has purchased wine at outlets of Manitoba Liquor Mart and of other wine vendors in Canada, including the LCBO. Dr. Kattenburg has no pecuniary or proprietary interest in the outcome of the litigation.
2. The Applicant is of Jewish origin and is the child of Holocaust survivors. The State of Israel's confiscation of occupied land in violation of international law and the concealment of the true place of origin of Settlement Wines on Canadian store shelves are inconsistent with the Applicant's respect for truth, justice and the rule of law. As a Jew, a Canadian citizen and a consumer of wines, the Applicant has a genuine interest in ensuring that Canadian consumers are informed of the true country of origin of wines made in Israel's unlawful West Bank settlements, and that Canada's consumer protection laws and trade agreements be interpreted and applied in a manner that is consistent with domestic and international human rights law.
3. The Minister of Health is responsible for administering the *FDA* and has delegated this responsibility to the CFIA.
4. The Minister of Agriculture and Agri-Food is responsible for administering the relevant provisions of the *CPLA* and has delegated this responsibility to the CFIA.

5. The Minister of Foreign Affairs is responsible for administering the *GCA* and ensuring Canada's compliance with the Fourth Geneva Convention.
6. The Minister of International Trade is responsible for administering the *CIFTA Act*.

The OPT Lies Outside of the State of Israel; Israel's Settlements in the West Bank Violate the Fourth Geneva Convention; and the CFIA's Decision to Permit the Importation and Sale of Settlement Wines Violates the *GCA*, the *Fourth Geneva Convention* and the *United Nations Charter*

7. The West Bank lies within the OPT. The OPT does not fall within the internationally recognized boundaries of the State of Israel and does not form part of the State of Israel.
8. Canada has long acknowledged that the OPT does not form part of the State of Israel and that Israel's settlements in the West Bank violate the *Fourth Geneva Convention*. The website of Global Affairs states:

> Canada does not recognize permanent Israeli control over territories occupied in 1967 (the Golan Heights, the West Bank, East Jerusalem and the Gaza Strip). The Fourth Geneva Convention applies in the occupied territories and establishes Israel's obligations as an occupying power, in particular with respect to the humane treatment of the inhabitants of the occupied territories. As referred to in UN Security Council Resolutions 446 and 465, Israeli settlements in the occupied territories are a violation of the Fourth Geneva Convention. The settlements also constitute a serious obstacle to achieving a comprehensive, just and lasting peace.

9. Virtually all governments, except that of Israel, consider Israel's settlements in the West Bank to be a violation of international law. Further, not even the State of Israel claims that the West Bank forms part of the State of Israel. Rather, the State of Israel generally claims that the West Bank is 'disputed territory.'

10. The International Court of Justice ("ICJ") is the principal judicial organ of the United Nations. It was established in June 1945 by Article 7 of the *Charter of the United Nations ("United Nations Charter")*. Canada is a party to the *United Nations Charter* and a founding member of the United Nations.

11. In 2004, the ICJ rendered an advisory opinion in which it held, unanimously, that Israel's settlements in the West Bank violate Article 49 of the *Fourth Geneva Convention*. As stated by the ICJ in its summary of that advisory opinion:

> The information provided to the Court shows that, since 1977, Israel has conducted a policy and developed practices involving the establishment of settlements in the Occupied Palestinian Territory, contrary to the terms of Article 49, paragraph 6, of the Fourth Geneva Convention which provides: "The Occupying Power shall not deport or transfer parts of its own civilian population into the territory it occupies." The Security Council has taken the view that such policy and practices "have no legal validity" and constitute a "flagrant violation" of the Convention. The Court concludes that the Israeli settlements in the Occupied Palestinian Territory (including East Jerusalem) have been established in breach of international law.

12. The United Nations Security Council and General Assembly have repeatedly condemned Israel's settlements as a violation of the *Fourth Geneva Convention*. The Security Council's most recent condemnation was issued in December 2016 when the Security Council adopted Resolution 2334, by a vote of 14-0 (with the United States abstaining). Resolution 2334 states, in part, as follows:

> The Security Council,
>
> Reaffirming its relevant resolutions, including resolutions 242 (1967), 338 (1973), 446 (1979), 452 (1979), 465 (1980), 476 (1980), 478 (1980), 1397 (2002), 1515 (2003), and 1850 (2008),
>
> Guided by the purposes and principles of the Charter of the United Nations, and reaffirming, inter alia, the inadmissibility of the acquisition of territory by force,

Reaffirming the obligation of Israel, the occupying Power, to abide scrupulously by its legal obligations and responsibilities under the Fourth Geneva Convention relative to the Protection of Civilian Persons in Time of War, of 12 August 1949, and recalling the advisory opinion rendered on 9 July 2004 by the International Court of Justice,

Condemning all measures aimed at altering the demographic composition, character and status of the Palestinian Territory occupied since 1967, including East Jerusalem, including, inter alia, the construction and expansion of settlements, transfer of Israeli settlers, confiscation of land, demolition of homes and displacement of Palestinian civilians, in violation of international humanitarian law and relevant resolutions,

Expressing grave concern that continuing Israeli settlement activities are dangerously imperiling the viability of the two-State solution based on the 1967 lines,

Recalling the obligation under the Quartet Roadmap, endorsed by its resolution 1515 (2003), for a freeze by Israel of all settlement activity, including "natural growth", and the dismantlement of all settlement outposts erected since March 2001,

[...]

1. Reaffirms that the establishment by Israel of settlements in the Palestinian territory occupied since 1967, including East Jerusalem, has no legal validity and constitutes a flagrant violation under international law and a major obstacle to the achievement of the two-State solution and a just, lasting and comprehensive peace;

2. Reiterates its demand that Israel immediately and completely cease all settlement activities in the occupied Palestinian territory, including East Jerusalem, and that it fully respect all of its legal obligations in this regard;

3. Underlines that it will not recognize any changes to the 4 June 1967 lines, including with regard to Jerusalem, other than those agreed by the parties through negotiations;

4. Stresses that the cessation of all Israeli settlement activities is essential for salvaging the two-State solution, and calls for affirmative steps to be taken immediately to reverse the negative trends on the ground that are imperilling the two-State solution;

5. Calls upon all States, bearing in mind paragraph 1 of this resolution, ***to distinguish, in their relevant dealings, between the territory of the State of Israel and the territories occupied since 1967***;

[...]

[Emphasis added.]

13. Article 25 of the *United Nations Charter* states that "The Members of the United Nations agree to accept and carry out the decisions of the Security Council in accordance with the present Charter." Thus, Canada is obliged under the *United Nations Charter* to give effect to the Security Council's call in Resolution 2334 for all United Nations members "to distinguish, in their relevant dealings, between the territory of the State of Israel and the territories occupied since 1967."

14. Furthermore, Article 1 of the *Fourth Geneva Convention* states that "The High Contracting Parties undertake to respect and to ensure respect for the present Convention in all circumstances." Thus, as a High Contracting Party to the *Fourth Geneva Convention*, Canada is obliged to ensure Israel's respect for the *Convention*. By allowing Settlement Wines to be imported and sold in Canada with false "Product of Israel" labels, Canada is violating its duty to ensure the State of Israel's respect for the *Convention*.

15. Section 2 of the *GCA* approves of the *Geneva Conventions* and certain protocols thereto. Further, Section 3 of the *GCA* declares that every person who, whether within or outside Canada, commits a grave breach referred to in Article 85 of Schedule V to the *GCA* is guilty of an indictable offence, and, if the grave breach causes the death of any person, is liable to imprisonment for life; and, in any other case, is liable to imprisonment for a term not exceeding fourteen years. Schedule V, Article 85 (4)(a) of the *GCA* states "In addition to the grave breaches defined in the preceding paragraphs and in the Conventions, the following shall

be regarded as grave breaches of this Protocol, when committed wilfully and in violation of the Conventions or the Protocol: (a) the transfer by the occupying Power of parts of its own civilian population into the territory it occupies ...in violation of Article 49 of the Fourth Convention." As stated above, the ICJ held unanimously in 2004 that Israel's settlements in the West Bank constitute a violation of Article 49 of the *Fourth Geneva Convention*.

Settlement Wines Labelled as "Product of Israel" Violate the *FDA*

16. Section 5(1) of the *FDA* states:

> No person shall label, package, treat, process, sell or advertise any food in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character, value, quantity, composition, merit or safety.

17. Section 2 of the *FDA* defines "food" to include "any article manufactured, sold or represented for use as food or drink for human beings..." Thus, Settlement Wines constitute a "food" for purposes of the *FDA*, and the Section 5 prohibition on false, misleading or deceptive labels applies to Settlement Wines sold in Canada.

18. A clear indication of the country of origin is required on all standardized wine products described in B.02.100 and B.02.102 to B.02.107 of the *Food and Drug Regulations* ("*FDR*"). Under the *FDR*, a wine may claim to be wine of a country if (a) the wine is made from at least 75 percent of the juice of grapes grown in that country and it is fermented, processed, blended and finished in that country; or (b) in the case of wines blended in that country, at least 75 percent of the finished

wine is fermented and processed in that country from the juice of grapes grown in that country.

19. There is no dispute that the Settlement Wines cited in the Applicant's complaint to the CFIA are made entirely of juice from grapes grown in the OPT and that the juice from which those Settlement Wines are made is fermented, processed, blended and finished in the OPT.

20. Accordingly, the "Product of Israel" declaration appearing on the Settlement Wines violates the *FDA* and the regulations promulgated thereunder.

Settlement Wines Labelled as "Product of Israel" Violate the *CPLA*

21. Section 7(1) of the *CPLA* states that "No dealer shall apply to any prepackaged product or sell, import into Canada or advertise any prepackaged product that has applied to it a label containing any false or misleading representation that relates to or may reasonably be regarded as relating to that product."

22. Section 2(1) of the *CPLA* defines a "dealer" as "a person who is a retailer, manufacturer, processor or producer of a product, or a person who is engaged in the business of importing, packing or selling any product." Thus, the producers, importers and sellers of Settlement Wines constitute "dealers" within the meaning of the *CPLA*.

23. Section 2(1) of the *CPLA* defines a "product" as "any article that is or may be the subject of trade or commerce..." That Section also defines a "prepackaged product" as "any product that is packaged in a container in such a manner that it is ordinarily sold to or used or purchased by a consumer without being re-packaged." Settlement Wines being sold in Canada are packaged in containers

that are ordinarily sold to or used or purchased by a consumer without being re-packaged.

24. Settlement Wines therefore constitute "products" and "prepackaged products" within the meaning of Section 2(1) of the *CPLA* and are therefore subject to the prohibition contained in Section 7(1) of the *CPLA* against false or misleading statements on labels.

25. Section 7(2) of the *CPLA* states:

> For the purposes of this section, ***false or misleading representation*** includes
>
> **[...]**
>
> **(c)** any description or illustration of the type, quality, performance, function, origin or method of manufacture or production of a prepackaged product that may reasonably be regarded as likely to deceive a consumer with respect to the matter so described or illustrated.

26. As stated above, the Settlement Wines were produced in the West Bank and the West Bank does not form part of the State of Israel. Thus, Settlement Wines bearing the country of origin declaration "Product of Israel" are likely and intended to deceive a consumer with respect to the country of origin of those wines. The Settlement Wines therefore violate Section 7 of the *CPLA* insofar as they are labelled as "made in Israel" or "Product of Israel."

Neither *CIFTA* Nor the *CIFTA Act* Authorizes Products Made in Israel's West Bank Settlements to be Labelled as "Product of Israel"

27. Article 1.4.1b of *CIFTA* states, in pertinent part:

> For the purposes of this Agreement, unless otherwise specified:
>
> [...]
>
> territory means:

[...]

(b) with respect to Israel the territory where its customs laws are applied;

28. The CFIA's interpretation of *CIFTA* gives no effect to the words "For the purposes of this Agreement." On the contrary, the CFIA's interpretation of *CIFTA* wrongly assumes that Article 1.4.1b's definition of "territory" of Israel applies for all purposes, including consumer protection purposes.

29. The purposes of *CIFTA* are set forth in Article 1.2 thereof, which states:

> *Article 1.2: Objective*
>
> 1. The objective of this Agreement, as elaborated more specifically in its provisions, is to eliminate barriers to trade in, and facilitate the movement of, goods between the territories of the Parties, and thereby to promote conditions of fair competition and increase substantially investment opportunities in the free trade area.
>
> 2. The Parties shall interpret and apply the provisions of this Agreement in the light of its objective set out in paragraph 1 and in accordance with applicable rules of international law.
>
> 3. Each Party shall administer in a consistent, impartial and reasonable manner all laws, regulations, decisions and rulings affecting matters covered by this Agreement.

30. Thus, the purpose of *CIFTA* is to eliminate barriers to trade. A barrier to trade is a government-imposed restraint on the international flow of goods or services. The most common trade barrier is a tariff. Other trade barriers include quotas and subsidies.

31. Although it is possible for a consumer protection requirement to constitute a barrier to trade, the vast majority of such requirements constitute legitimate action by a government to inform and protect the public and do not run afoul of trade agreements. The Minister of International Trade recognizes this on the Global Affairs website, which states:

> Successive rounds of multilateral trade negotiations at the World Trade Organization (WTO), and the negotiation of numerous bilateral and regional trade arrangements have led to a substantial reduction in global tariffs. As tariffs have decreased, there has been increased focus on ensuring non-tariff measures or policies, including technical regulations and standards, do not restrict or distort international trade.
>
> Governments use technical regulations and standards to achieve a range of policy goals, such as ensuring the health and safety of their citizens, protection of the environment, and consumer protection. While the vast majority of technical regulations and standards are designed to achieve non-trade related objectives, they can also have the unintended effect of restricting or distorting trade. Furthermore, as the use of tariffs as a trade-policy tool has diminished, there can, at times, be an increased incentive for governments to use regulations and standards as an alternative, and less transparent means of restricting the entry of foreign products.
>
> [...]
>
> Canada's international trade agreements preserve the right of Canada and its trading partners to regulate in order to meet legitimate objectives, such as human health and safety, or environmental protection. At the same time, they impose rules that [sic] aimed at ensuring that technical regulations and standards do not unnecessarily restrict international trade. Having strong international rules relating to technical regulations and standards provides Canadian exporters with more secure, predictable access to foreign markets for their products. It also helps business and consumers, by ensuring that technical regulations and standards do not add unnecessary costs to internationally traded products.

32. A requirement that labels on all wine products, whether domestic or foreign, accurately identify the product's country of origin is not a barrier to trade. Such a requirement is a legitimate measure to inform and protect Canadian consumers. By their plain terms, Section 5 of the *FDA* and Section 7(1) of the *CPLA* apply to all wine products, whether domestic or foreign. Thus, they are non-discriminatory and preserve a level playing field for domestic and foreign wines. Under applicable laws and regulations, the country of origin labels on Canadian wines are no less required to be accurate than the country of origin labels on the

Settlement Wines. Thus, those requirements are not barriers to trade and do not run afoul of *CIFTA*, nor does *CIFTA*'s definition of the "territory" of Israel bring the labels on the Settlements Wines into compliance with Canadian prohibitions on false and misleading labelling. At the most, *CIFTA*'s definition of "territory" of Israel entitles products made in the OPT to preferable tariff treatment but does not permit those products to be falsely labeled as "Product of Israel."

33. Further, Article 4.2 of *CIFTA* excludes all standards-related matters, noting that "The rights and obligations of the Parties relating to standards-related measures shall be governed by the *Agreement on Technical Barriers to Trade* [of the World Trade Organization]." Thus, *CIFTA* in no way affects the operation of Canada's labelling laws.

34. Even if *CIFTA* contained a provision which purported to entitle producers in Israel's illegal settlements to label their products as "Product of Israel" – and *CIFTA* contains no such provision – such a provision could not override Section 7 of the *CPLA* because Section 3 of the *CPLA* stipulates that the provisions of the *CPLA* apply notwithstanding any other Act of Parliament.

35. Finally, and as stated above, Article 1.2.2 of *CIFTA* requires that *CIFTA* be interpreted and applied in accordance with applicable rules of international law. The interpretation of *CIFTA* that the CFIA has adopted violates, among other aspects of international law, the *Fourth Geneva Convention*, the *United Nations Charter*, the ICJ's 2004 advisory opinion as to the illegality of Israel's West Bank settlements, and numerous resolutions of the United Nations Security Council and General Assembly.

Jurisdiction

36. The Federal Court has jurisdiction to hear this application for judicial review of the matter described above, and to grant the relief sought, pursuant to sections 18 and 18.1 of the *Federal Courts Act*, R.S.C. 1985, c. F-7. In addition, the Applicant relies on the *Federal Court Rules*, the other Acts and regulations referred to herein, and such additional grounds as counsel may identify.

Supporting Material

37. The Application will be supported by the following material:

(a) The affidavit of Dr. David Kattenburg, to be served;

(b) Material requested pursuant to Rule 317 and produced to the Applicant and to the Court pursuant to Rule 318 of the *Federal Court Rules*; and

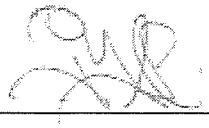
(c) Such further materials as Counsel may advise and the Court may permit.

Rule 317 Request

38. The Applicant requests the Minister of Health, the Minister of Agriculture and Agri-Food, the CFIA (as delegate of the Minister of Health and the Minister of Agriculture and Agri-Food), the Minister of Foreign Affairs and the Minister of International Trade to send a certified copy of the following material that is not in the possession of the Applicant, but is in the possession of one or more of such Ministers and/or the CFIA, to the Applicant and to the Registry:

    All documents, including rulings, directives and decisions, in the possession of the Minister of Health, the Minister of Agriculture and Agri-Food, the CFIA, the Minister of Foreign Affairs and the Minister of International Trade relating to the country of origin declaration on the labels of wines produced in the State of Israel's settlements in the OPT.

Date: October 24, 2017



A. Dimitri Lascaris LSUC#: 50074A
Counsel for the Applicant
London Station B, P.O. Box 66
London ON N6A 4V3
Tel.: (519) 851-5991
Email: alexander.lascaris@gmail.com

Per: James Yap LSUC#: 61126H