

Schedule A

1. The Applicant, [REDACTED] is a survivor of sex trafficking. She has Attention Deficit Hyperactive Disorder (“ADHD”), Autism Spectrum Disorder (“ASD”), Traumatic Brain Injury (“TBI”), and Complex post-traumatic stress disorder (“C-PTSD”) resulting from childhood trauma from abuse, spiritual/religious abuse, intimate partner abuse with her first intimate partner in her late teens and every intimate partner subsequent to him.
2. On July 20, 2022, Ms. [REDACTED] sent an email to Angela Lippensky of DMS Property Management, the property management company responsible for managing Ms. [REDACTED]’s housing project, located at 90 Edgehill Drive, Barrie, Ont., L4N 6G3, at the time.
3. Within this email, Ms. [REDACTED] requested to be transferred to a different building because her safety was at risk. Ms. [REDACTED] informed Angela that she was being harassed by another tenant in her building, and that when she told other building management confidential information, this information was released to other tenants in her building.
4. Ms. [REDACTED] informed Angela that she had already run into a past rapist in her building, in addition to other individuals who should not know where she lives due to her on-going human trafficking case.
5. Ms. [REDACTED] also informed Angela that she had an Emotional Support Animal (“ESA”), in which she could not afford a harness for, since her only income was Ontario Works (“OW”). Ms. [REDACTED] also provided Angela with a copy of her June 2022 OW pay stub.
6. Ms. [REDACTED] was approved for the Ontario Disability Support Program (“ODSP”) on or around August 24, 2023.
7. Ms. [REDACTED] further provided Angela with the names and contact information of key contacts at the Victim Services department with the Barrie Police department, including the head detective in the human trafficking division.
8. On July 26, 2022, Angela told Ms. [REDACTED], via email, that since she’s a subsidized tenant, a transfer outside of the building is dealt with through the County of Simcoe.

9. On or around July 27, 2022, Angela forwarded Ms. ██████'s request for transfer for safety reasons to Robin Chapman, the Program Supervisor, Non Profit for the County of Simcoe's Social Housing Department.
10. On September 8, 2022, Ms. ██████ emailed Robin again since she'd still not heard from Robin yet, and inquired about any updates pertaining to her request for transfer to another building for safety reasons.
11. On September 27, 2022, Ms. ██████ emailed the Office of MPP Andrea Khanjin seeking help with her transfer to a different housing project due to safety reasons.
12. On August 2, 2022, Robin responded to Ms. ██████ via email and made the following statement:

"...Unfortunately there isn't anything I can do to assist with a transfer of units/buildings..."

13. On November 1, 2022, Katherine Chabot, Executive Assistant at the Constituency Office of Andrea Khanjin, explained to Ms. ██████ in an email the following:
 - a) Katherine has been working with Brad Spiewak, Director of Social Housing, and Brad Bishop, General Manager of Social and Community Services Division for the County of Simcoe to try to find a solution;
 - b) Katherine was advised that tenants are only allowed to request an internal transfer due to an extreme shortage of housing;
 - c) Katherine was advised to encourage Ms. ██████ to contact the police and file a no contact order;
 - d) Katherine presented to Ms. ██████ the option of leaving the Rent-Geared-to-Income ("RGI") building and receive a rent supplement or portable housing benefit instead, which would result in Ms. ██████ being removed from the RGI program and forced to go on the Centralized Waitlist for RGI;
 - e) Katherine advised Ms. ██████ to speak to the local women's shelter to access support with developing a safety plan and assist with legal proceedings such as pursuing a restraining order;
 - f) Katherine provided a link to Ms. ██████ for more information about the County's Housing Retention Program.

14. Ms. [REDACTED] already looked into getting a restraining order on the past rapist who frequented her building to sell drugs to other tenants. The police advised Ms. [REDACTED] not to get a restraining order against this individual because it would put a target on Ms. [REDACTED]s back by his customers who require regular “drug fixes”. Instead, the police wrote a letter of support seeking a transfer to a different location for Ms. [REDACTED].
15. Beginning on or around June 22, 2023, Ms. [REDACTED] began being harassed by more tenants in her building regarding her ESA, whom is a pure breed [REDACTED].
16. Ms. [REDACTED]s dog is an extremely friendly, kind and non-aggressive dog. However, Ms. [REDACTED]s dog is quite large and is bred from a line of [REDACTED] dogs.
17. Ms. [REDACTED]s housing project has 217 units in it, and is filled with occupants who’ve had frequent “run-ins” with police and other law-enforcing agents that work with police dogs.
18. Many of the tenants residing at 90 Edgehill Drive appear to experience a severe post-traumatic stress response at the mere sight of Ms. [REDACTED]’s dog, likely a result of their past “run-ins” with police K9 units.
19. Through an extensive defamatory campaign of falsified and discriminatory complaints made against Ms. [REDACTED] by other tenants residing at 90 Edgehill Drive, as well as her own housing services provider, whom was eventually changed to the Gateway Co-operative Homes Inc. C/O Bayshore Property Management, the Landlord and Tenant Board (“LTB”) evicted Ms. [REDACTED] on August 13, 2023, despite not having any evidence of Ms. [REDACTED]’s dog attacking anyone, or being aggressive.
20. Ms. [REDACTED] now lives with her boyfriend, which may or may not be a safe situation for her to be in, especially considering her high level of vulnerability and potential susceptibility to being trafficked again.
21. Gateway Co-operative Homes Inc. C/O Bayshore Property Management engaged in the following human rights violations:
 - a) Refusal to grant Ms. [REDACTED] an external transfer for health and safety reasons;
 - b) not only did it permit Ms. [REDACTED] to be harassed by other tenants, it encouraged this harassment and joined these tenants in harassing her; and

- c) Failure to accommodate Ms. [REDACTED]'s extensive needs as a survivor of sex trafficking.
22. The County of Simcoe's Social Housing department engaged in the following human rights violations:
- a) Segregation of a highly vulnerable tenant into an area known for having a high rate of crime and violence;
 - b) Refusal to grant Ms. [REDACTED]'s request for an external transfer for health and safety reasons; and
 - c) Failure to accommodate Ms. [REDACTED]'s extensive needs as a survivor of sex trafficking.
23. Both the Gateway Co-operative Homes Inc. C/O Bayshore Property Management and the County of Simcoe hold pejorative attitudes based on strongly held views about the appropriate capacities and limits of its single, female mothers in receipt of an income supplement and of below market-rate tenants. This discrimination is motivated by an intentional desire to obstruct Ms. [REDACTED]'s potential, which perpetuates her disadvantage. The respondents have perpetuated and promoted the view that Ms. [REDACTED] is less worthy of recognition and value as a human being and as a member of Canadian society.
24. The respondents' discriminatory actions, whether intentional or not, are based on grounds relating to personal characteristics, having had the effect of imposing burdens, obligations and disadvantages on Ms. [REDACTED] which are not imposed upon others, and which withheld and limited Ms. [REDACTED]'s access to opportunities, benefits and advantages, which are available to other members of society.
25. Considering the historical disadvantage faced by women, victims of abuse and trafficking, and disabled persons, the respondents have failed to exercise preferential treatment which is required in order to ameliorate the actual situation of Ms. [REDACTED]
26. Collectively, the respondents are responsible for increasing homelessness and sex-trafficking in the County of Simcoe, Ontario as a result of discriminatory actions taken against vulnerable people, such as Ms. [REDACTED], whom are protected by Code grounds.



Cassandra Weatherston

Yesterday at 7:23 PM

Re: Statement of Delivery for HRTO File #: 2024-57438

To: leah.dyck@icloud.com



Good afternoon,

I represented Gateway Co-Operative Homes C/O Bayshore Property Management Inc at the Landlord and Tenant Board hearing for Ms. [REDACTED]. You may want to ask her for a copy of the eviction order. Gateway did not evict her, the LTB did.

Cassandra Weatherston, B.A. (Hon),
Paralegal

Weatherston Paralegal Services

30 Quarry Ridge Road

Barrie, ON L4M 7G1

Tel: 705-331-0591

Email: cassandra@weatherstonparalegal.com

Website: www.weatherstonparalegal.com

The information contained in this document is confidential and subject to paralegal-client privilege. If the reader is not the intended recipient or the agent thereof, the reader is hereby notified that any dissemination, distribution or copying of this document is strictly prohibited. If you have received this document in error, please notify us immediately and return the original document to us by mail at our expense. Thank you.

From: Barbara Barrett <bbarrett@bpmgmt.ca>

Sent: Wednesday, January 8, 2025 5:07 PM

To: Cassandra Weatherston <cassandra@weatherstonparalegal.com>

Subject: FW: Statement of Delivery for HRTO File #: 2024-57438

Best Regards;

Barb Barrett - OLCM

T: (705) 722-3700 Ext: 2630 | F: (705) 722-6242 | Email: bbarrett@bpmgmt.ca

135 Bayfield St., Suite 201 Barrie ON L4M 5N6



Visit Our Website: www.bayshoreproperty.ca

EMERGENCY AFTER HOURS (800) 265-9695

Pronouns: She/her/hers



Leah Dyck

Yesterday at 8:13 PM

Re: Statement of Delivery for HRTO File #: 2024-57438

To: Cassandra Weatherston



Hi Cassandra,

I'm not really sure what to say to that:

- Gateway Co-Operative tried to evict her and assisted in this eviction.
- Gateway Co-Operative harassed her.
- Gateway Co-Operative did not accommodate her request for transfer.
- Gateway Co-Operative probably asked other tenants to falsify their concerns.
- Does Gateway Co-Operative know anything about her boyfriend? Is Gateway Co-Operative really not concerned for her safety at all? Does Gateway Co-Operative care if she gets trafficked again? Do you not realize that Gateway Co-Operative has negated the purpose of the Special Priority Policy?
- I don't really care who signed the eviction order. What matters is that an eviction order was issued and that [REDACTED] was harassed and that she was not transferred and that her needs were not accommodated.
- On top of all of this, she's highly vulnerable, due to her being a victim of sex-trafficking. This matters when it comes to general damages.

I'm curious to know how much Gateway Co-Operative has spent on legal fees to evict her/try to evict her/aid in her eviction. I'm sure it's significantly more than paying for her dog to get professionally trained. I'm also sure it's more than getting her transferred too. Yet Gateway Co-Operative was determined to take the more expensive route to fix the "[REDACTED] problem".

There's an overarching pattern among at least several housing services providers in the County of Simcoe, which now includes Gateway Co-Operative. This pattern of serious human rights violations, and violations of the Service Manager Delegation Agreement, is significantly contributing to our areas homelessness and sex-trafficking problem.

My end goal in all of this is to change policies so housing providers such as Gateway Co-Operative cannot continue destroying innocent, vulnerable people's lives anymore. I can only imagine how many other victims just like [REDACTED] were abused by Gateway Co-Operative in the exact same way.

This evening, I was informed that [REDACTED] will need to file her own human rights lawsuit. She won't be able to be an applicant in my lawsuit but I can still add Gateway Co-Operative as a respondent in my lawsuit. So tomorrow I will ask her sister to file a new lawsuit on [REDACTED]'s behalf. And if her sister isn't up for it, I'll do it.

Leah



Cassandra Weatherston

Yesterday at 8:26 PM

Re: Statement of Delivery for HRT0 File #: 2024-57438
To: Leah Dyck

Good afternoon,

I find it hard to believe that all of the complainants and the RVH are fabricating evidence. I highly recommend you read the order.

Cassandra Weatherston, B.A. (Hon),
Paralegal

Weatherston Paralegal Services

30 Quarry Ridge Road

Barrie, ON L4M 7G1

Tel: 705-331-0591

Email: cassandra@weatherstonparalegal.com

Website: www.weatherstonparalegal.com

The information contained in this document is confidential and subject to paralegal-client privilege. If the reader is not the intended recipient or the agent thereof, the reader is hereby notified that any dissemination, distribution or copying of this document is strictly prohibited. If you have received this document in error, please notify us immediately and return the original document to us by mail at our expense. Thank you.



Leah Dyck

Yesterday at 8:58 PM

Re: Statement of Delivery for HRT0 File #: 2024-57438
To: Cassandra Weatherston



I absolutely believe the tenants are fabricating their concerns, which is not evidence.

And I did read something from the RVH. How would the RVH know if that man was attacked by [REDACTED]'s dog? They wouldn't.

Anyways, have a great night Cassandra.

Sent from my iPhone



Cassandra Weatherston

Yesterday at 8:59 PM

RE: Statement of Delivery for HRT0 File #: 2024-57438
To: Leah Dyck



Cassandra Weatherston reacted to your message:

[See More from Leah Dyck](#)