



March 5, 2021

**PARTICULARS IN THE MATTER OF**

**A.B.  
and  
C.D. and E.F.  
and Attorney General of British Columbia**

**COURT FILE NO. E-190334  
NEXT APPEARANCE DATE: April 12, 2021**

**TO: C.D. and his legal counsel Mr. Linde**

c/o Law Offices of Carey Linde  
605 – 1080 Howe Street  
Vancouver, BC V6Z 2T1

**March 5, 2021 via SFTS to Mr. Linde – kw**

- ❖ Police Statement 4 of Sgt. Pyper (1 pg);
- ❖ Updated notes of Sgt. Pyper (5 pgs);
- ❖ Affidavit #1 of K. Workman, with exhibits A, B, D & E (16 pgs); and
- ❖ Video entitled, "Understanding Transgender Issues – The Assault on Parental Rights-446235695" (*please note this video is Exhibit "C" in Ms. Workman's affidavit*).

**January 5, 2021 via hand to Mr. Linde – kw**

- ❖ One DVD containing the following:
  - a. Police Statement 3 of Det. Pyper (2 pgs);
  - b. Updated Notes of Det. Pyper (5 pgs);
  - c. Video entitled, "BREAKING – FPV#214 – Father Goes to Court to Fight Against State Sponsored Child Abuse-eA71PqT03Mw";
  - d. Video entitled, "EXCLUSIVE – PARENT of Transgender Daughter NOW FACING 30 TO 45 DAYS IN JAIL for TELLING HIS STORY!!!-vLjdtMR3Heh8";
  - e. Video entitled, "School convinces girl she is a boy, now court demands father comply-eN\_xrMEyDic"; and

- f. Video entitled, "Update With Heroes – Jeff Younger and Rob Hoogland-5MNLj5sm0Hg."

**Initial Disclosure September 1, 2020 via courier to Mr. Linde – kw**

- ❖ One encrypted USB containing the following material:
  - a. Disc 1 - Video entitled, "Dad Speaking Out Despite Gag Order-0a1qUsk3reY";
  - b. Transcript entitled, "Recorded YouTube Interview with 'CD'" (37 pgs);
  - c. Police Synopsis (1 pg);
  - d. Will Say of Det. Pyper (1 pg);
  - e. Police Statement 1 of Det. Pyper (2 pgs);
  - f. Police Statement 2 of Det. Pyper (1 pg); and
  - g. Notes of Det./Cst. Pyper (3 pgs);

Please find attached a copy of the Crown's particulars in relation to this matter.

**TO THE ACCUSED**

**TAKE NOTICE THAT** this disclosure material is provided to you for the sole purpose of assisting you to make full answer and defence in this prosecution. You must not use the material for any other purpose or for any other case.

1. The material may contain private or confidential information. You must keep it secure and not copy it or provide to any other person, other than your legal counsel, without the prior written permission of Crown Counsel.
2. The conditions set out above also apply to any further or additional disclosure material provided to you in relation to this prosecution.
3. If you are unable or unwilling to comply with these conditions, please immediately return the material to Crown Counsel.
4. If it is your intention to apply to exclude evidence under the section 24(2) of *The Canadian Charter of Rights and Freedoms*, you must give the Crown timely notice of the evidence you intend to rely on to support your application as well as the specifics of your argument and any remedy you seek.

**TO THE ACCUSED AND DEFENCE COUNSEL**

**TAKE NOTICE THAT** the Crown intends to produce the documents and records contained in this disclosure material, and any related testimony, at the trial or preliminary inquiry, pursuant to the *Canada Evidence Act*, *BC Evidence Act*, *Controlled Drugs or Substances Act* or the *Criminal Code*.

**TO DEFENCE COUNSEL**

**TAKE NOTICE THAT** this disclosure material is provided to you for the sole purpose of assisting the accused to make full answer and defence in this prosecution and not for any other purpose or any other case and also on the following conditions:

- a) You must keep the material in a secure fashion.
- b) You may permit access to the material or copy it for the use of the accused or persons acting under your supervision (for example, articling students, associate counsel, paralegals) in the preparation and presentation of the defence but only on the condition that they not copy it or provide access to it by anyone else.
- c) You must not copy or provide access to the material to any person or counsel who is not acting under your supervision. Notwithstanding the foregoing, you may copy the material and use it in conducting the defence (for example, in cross-examining a witness, providing material to the court, or providing witnesses with copies of their own statements).
- d) You may permit access to the material or copy it for the use of any expert retained to assist in the preparation and conduct of the defence but only on the condition that they not copy it or provide access to it by anyone else.
- e) You must not permit access to the material by or copy it for any person other than those referred to in conditions 2, 3, and 4, above, without the prior written consent of the Crown or a court order.
- f) If you are unable or unwilling to comply with any of these conditions, please immediately return this disclosure material to Crown Counsel.

VANCOUVER REGIONAL CROWN COUNSEL OFFICE  
Enclosures