

CANADA PROVINCE OF QUEBEC	COURT OF QUEBEC (Criminal and Penal Division)
JUDICIAL DISTRICT: <hr/>	Name and address of the Petitioner:
(Designation of Judicial District)	Name: _____ Address
Court File #:	Civic Number: _____ Street: _____ Municipality : _____
<hr/> (to be provided by Court Clerk)	Province : Quebec Postal Code: _____
	PETITIONER
	-vs-
	Chief Firearms Officer (Quebec), 1701 Parthenais St., 10 th Floor, Montréal, Québec, H2K 1S7
	RESPONDENT

REFERENCE PURSUANT TO S. 74 OF THE FIREARMS ACT
(S.C. . 1995, Chapter 39)

THE PETITIONER RESPECTFULLY EXPOUNDS AS FOLLOWS:

1. Up until recently, the Petitioner held a firearms license (PAL) issued by the Respondent, as part of the Canadian Firearms Program, pursuant to his powers under the (Canada) Firearms Act;

2. Within the last thirty (30) days, the Petitioner received a Notice from the Respondent, revoking the Petitioner's firearms license;
3. The stated reason for revoking the Petitioner's firearms license is that the Petitioner is allegedly a member of a criminal biker gang and/or has relations with such a gang;
4. The stated reasons are erroneous and unfounded;
5. The revocation of the Petitioner's firearms license is part of a wholesale revocation process, whereby the Respondent has more or less simultaneously revoked the firearms licences of hundreds of individuals who happen to belong to or used to belong to motorcycle clubs, even though those individuals do not engage in criminal activities, nor are they in relation with criminal biker gangs;
6. Indeed, the Petitioner has learned through social media and contacts that these are several hundred people in a similar situation;
7. The Respondent's decision making process does not comply with the requirements of procedural fairness;
8. This Reference is well founded.

WHEREBY, THE PETITIONER REQUESTS THE FOLLOWING RELIEF FROM THIS COURT:

QUASH, for all intents and purposes, the Respondent's decision revoking the Petitioner's firearms license;

ORDER the Respondent) to reinstate the Petitioner's firearms license or, alternatively, to issue a new firearms licence to the Petitioner, within ten (10) days of the decision to be rendered herein;

ORDER the provisional execution of the decision to be rendered herein, notwithstanding appeal;

THE WHOLE RESPECTFULLY SUBMITTED

October _____, 2018

(Petitioner's Signature)

SWORN DECLARATION (AFFIDAVIT)

I, the undersigned, do hereby solemnly declare as follows :

- a. I am the Petitioner;
- b. I reside at the address shown in the stale of cause of this matter;
- c. All of the facts alleged in the attached Reference are true and correct;

AND I HAVE SIGNED:

(Petitioner's Signature)

Solemnly declared at : _____
this ___ day of October 2018

(Signature of individual receiving oath)

- ___ Assistant Clerk
- ___ Commissioner of Oaths
- ___ Notary
- ___ Lawyer

Notice of presentation

NOTICE IS HEREBY GIVEN TO:

Chief Firearms Officer (Quebec),
1701 Parthenais St.,
10th Floor, Montréal, Québec,
H2K 1S7

RESPONDENT

that this Reference pursuant to s. 74 of the Firearms Act will be presented to the Court of Quebec, Criminal and Penal division, at the Court House of this district, on the date and time shown below :

Court House Address:	
Court Room #:	
Date of hearing:	
Time of hearing:	

DO GOVERN YOURSELVES ACCORDINGLY

this ____ day of October 2018

(Petitioner's Signature)