

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

HER MAJESTY THE QUEEN

Respondent

- and -

TAMARA LEE LICH

Applicant

AFFIDAVIT OF TAMARA LEE LICH

I, TAMARA LEE LICH, of the City of Medicine Hat, in the Province of Alberta, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the Applicant/Accused herein and as such I have knowledge of the matters to which I hereinafter depose except where stated to be on information or belief, in which case, I will state the source of my information and belief.
2. I am currently charged with the following criminal offences:
 - (a) one count of counselling the participants of the Freedom Convoy 2022 to commit mischief (sec. 464(a) CCC); and
 - (b) one count of mischief by willfully obstructing, interrupting or interfering with the lawful use, enjoyment or operation of property (sec. 430(1)(c) CCC);

3. I have no criminal record and I have no other outstanding charges.
4. Trial dates have not been set for this matter.
5. I was born in Saskatoon, Saskatchewan. My biological mother was 18 years old at the time of my birth. My biological maternal grand-mother was Cree and my biological maternal grand-father was Métis.
6. I understand that I was in a foster home for approximately 2 months and then adopted by a Caucasian family. I was raised by my adopted family and had 5 adopted siblings.
7. As far as I can remember, my adoptive family told me that I was adopted. when I was approximately 18 years old, I met my biological family and was able to connect with my biological mother and her family.
8. As far as I can remember I always identified as indigenous spiritually. I have attended at smudging and sweat lodge ceremonies and retreats from time to time to nourish my indigenous spiritual growth.
9. I am a card-carrying member of the Métis Nation of Alberta.
10. I completed my High School Diploma and then took some college courses. I have also completed one course at the University of Manitoba in the municipal accounting program.
11. I have been residing in Medicine Hat, Alberta since February 2012, except for a period between April 2020 and in or about November 2021, when I resided in Manitoba.
12. I worked in the oil and gas administration service industry in Alberta from 2017 until I was

laid off in March 2020 due to closures related to Covid-19.

13. At about the same time, my husband also lost his employment due to closures related to Covid-19. We then decided to move to Manitoba. In Manitoba, I was able to secure employment as an administrative assistant with the Municipality of Harrison Park, Manitoba.
14. In or about November 2021, my husband and I were able to secure our respective employment back in Alberta and thus moved back to Alberta. I have been working at the same company since November 2021.
15. It is my intention to return to Medicine Hat, Alberta and reside in my home, if released on bail.
16. If released on bail, I expect that I will be returning to my employment. I took time off out of my accumulated 5-week vacation to come to Ottawa. My employer is prepared to take me back if I am released from custody.
17. During the time that I was in Ottawa, I received death threats. A copy of one of the threats I received on the internet is attached hereto and marked as **Exhibit "A"** to this affidavit.
18. I am advised by Ms. Magas, and do verily believe, that she sent a copy of the above-referred threat to Crown counsel before the commencement of the bail hearing. As a result, I understand that counsel agreed to keep my full address and the name and address of my employer private and not to be disclosed in open court of this public bail hearing.
19. Ms. Magas advises me that during the lunch break of the bail hearing, she spoke to one of the lawyers from the Justice Centre for Constitutional Freedom who confirmed to her that their brother was coming to Ottawa to pick them up and drive them back out West and that

they could bring me and my husband back to Alberta at the same time.

20. Ms. Magas further advises me that she facilitated a conference between that lawyer and the Crown attorney so that the Crown attorney could satisfy himself that they were a lawyer and that they were going to be in the vehicle with me on the ride back to Alberta.
21. Ms. Magas advised me that the Crown attorney agreed to keep the name of the lawyer private because of the threats that have been made to me. This was said in part in Court by Ms. Magas and confirmed by Crown counsel upon the return to court after the lunch break.
22. At my bail hearing, it was the first time I was called as a witness in a legal proceeding. It was the first time I was arrested and charged with a criminal offence. It was the first time I spent time in jail.
23. I was nervous and anxious and tried to focus on answering the questions of the lawyers to the best of my abilities during this stressful time. When I was asked a yes or no type of question, I just answered the question by a yes or no. I did not know that the Judge expected me to elaborate on the answer, if the lawyer asking the question did not ask me to elaborate. I was sincere and truthful in my answers when I said yes that I was prepared to follow the conditions of my release. I was sincere and truthful when I answered yes to the question of whether I would go home if released.
24. It was also the first time my husband, Dwayne Lich, testified in a court of law, as far as I know. I could see from his answers and behaviour that he was very nervous and was trying to answer the questions too quickly without thinking and processing the questions properly first. For example, he said that he flew to Canada on a private jet. It was not a private jet, but a plane that was chartered.
25. Another example is that he told the court he was spending about \$7.00 per day on food but

forgot to mention that there was a free continental breakfast offered at the hotel; that there were volunteers that would bring us free food for supper at the hotel; and, that there was a lot of free food on the streets of Ottawa that people were giving away to the people walking on the streets.

26. After the decision denying me bail, my lawyer, Ms. Magas advised me that she received an email that contained a news article with a video that showed Justice Bourgeois being praised by Justin Trudeau as a candidate for the Liberal Party of Canada during the 2011 election campaign. I was not aware of that information before the bail hearing on Saturday February 19, 2022. If I were aware of that information, I would have asked my lawyer to request that Justice Bourgeois recuse herself as my Bail Judge because the protests at the heart of the charges I am now facing included unequivocal expressions of discontent with Justin Trudeau's office as Prime Minister in particular, and the Liberal Party of Canada, related to the federal government's Covid-19 related mandates.
27. In addition, I was arrested on Thursday February 17, 2022 and first detained at the police station and then at the detention center until my bail hearing on Saturday February 19, 2022. I had very limited access to speaking to my lawyer and did not advise her during our conversations that I was Métis. My indigenous status was not explored with counsel prior to the bail hearing.
28. If I am released on bail, I fully intend to follow every condition imposed on me by this Court, and I am confident that I will remain on judicial interim release pending trial without breaching any of my conditions.
29. I will surrender myself into custody on the date and at the place required by this Court.

30. [REDACTED], has offered to be my surety if I am released on bail. I respect my [REDACTED] very much and I do not want to jeopardize the money she has agreed to pledge as a bond for my release.
31. My husband has secured for us a ride to return to Medicine Hat, Alberta on Wednesday if I am released on bail.
32. I make this affidavit in support of this Application for bail review and for no other or improper purpose.

SWORN BEFORE ME at the City)
of Ottawa, in the Province of Ontario)
this 2nd day of March 2022)

A Commissioner, etc.

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Tamara Lich