

**IN THE NUNAVUT COURT OF JUSTICE**

**BETWEEN:**

**HIS MAJESTY THE KING**

**-and-**

**KARIMA MANJI**

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**AGREED STATEMENT OF FACTS**

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1. Karima Manji (Dec-19-64) is resident of Toronto, Ontario.
2. On September 26, 1998, Karima Manji gave birth in Mississauga, Ontario to twin daughters: Nadya and Amira Gill.
3. In February 2016, Karima Manji completed two forms called “Enrolment Form for Inuit Children.” A form was completed for each daughter.
4. The purpose of the Enrolment Forms for Inuit Children is to enroll Inuit children in the Nunavut Tunngavik land claim. People enrolled as such are officially beneficiaries of the land claim.
5. The enrolment process is jointly run by the Qikiqtani Inuit Association (QIA) and Nunavut Tunngavik Incorporated (NTI).
6. In the enrolment forms, Karima Manji included information that Nadya and Amira were Inuit children, that their birthmother was an Iqaluit woman named Kitty Noah, and that Karima Manji was the adoptive mother of the children.
7. Karima Manji sent the enrolment forms to NTI. The Community Enrolment Committee approved the applications for both Amira and Nadya, in May 2016 and October 2016 respectively.
8. Upon approval, Karima Manji was provided with NTI Enrolment Cards. These cards include enrolment numbers for beneficiaries under the Nunavut land claim. Cards were issued for both daughters and provided to Karima Manji as the applicant.
9. Karima Manji, being the birthmother of Amira and Nadya, provided false information on the Enrolment Forms about Nadya and Amira’s birth and eligibility for enrolment.
10. Karima Manji provided her daughters the fraudulent NTI Enrolment Cards; the daughters were unaware the cards were fraudulent.
11. Kakivak Association (Kakivak) is an organization serving Inuit by, among other things, providing sponsorship funding to Baffin Inuit for education related expenses.

12. With the fraudulent Inuit status applied for by Karima Manji and provided to the daughters by Karima Manji, both Nadya and Amira received sponsorship funding from Kakivak.
13. From September 2020 to March 2023, the total amount paid out to Nadya and Amira Gill was \$158,254.05.
14. A further \$64, 413 was on hold for Amira Gill in the spring of 2023, but was not paid out.
15. An investigation into the false Inuit status of the Gill sisters was initiated by the family of Kitty Noah raising the issue. Both daughters were removed from the NTI Enrolment list in April of 2023.
16. In 2018, Karima Manji submitted another application to NTI seeking enrolment for herself as a beneficiary. She included in the form that she was adopted by Inuit parents. This application was unsuccessful and she did not receive an NTI Enrolment Card for herself.
17. Karima Manji has a criminal record. On August 16, 2017, she was sentenced for one count of fraud over \$5000 contrary to s.380(1)(a) of the *Criminal Code*. She received a conditional sentence order of two years less a day followed by a one year probation order.



**Scott Cowan, Counsel for the Accused**

February 8 2024

**Date**



**Sarah White, Crown Counsel**

February 8, 2024

**Date**