

Ministry of the  
Attorney General  
Legal Services Division

Ministère du  
Procureur général  
Division des services juridiques

Civil Remedies for Illicit Activities Bureau de recours civil à l'égard  
Office d'activités illicites

77 Wellesley St. West  
P.O. Box 555  
Toronto, ON M7A 1N3

Tel: (416) 314-5881  
Fax: (416) 314-3714



77 rue Wellesley ouest  
boîte postale #555  
Toronto, ON M7A 1N3

Tél: (416) 314-5881  
Téléc.: (416) 314-3714

21 October 2010

Douglas H. Christie  
Barrister and Solicitor  
P.O. Box 24052  
4420 West Saanich Road  
Victoria, B.C.  
V8Z 7E7  
Fax: 250-479-3294

Dear Sir:

Re: Attorney General Of Ontario v. 2269 Highway # 105, Rugby Township, (In Rem) and  
Monty's Gunsmithing Inc., William Bruce Montague, and Donna Jeanne Montague Court File  
No.: CV 05-138

Attached to this letter is an issued Notice of Application served on you as counsel according to  
the Ontario Rules of Civil Procedure.

You will see that there is a date for the application to be heard, February 23, 2011. That date is  
simply a placeholder, as a date must be placed on the Notice of Application. That date is a  
regularly scheduled motions and applications date, for which there is a maximum time limit of  
two hours. If you believe that we can deal with this matter within the two hour time limit we can  
leave it on this date. Otherwise, I believe we will likely need more time and will need to  
schedule court time when we have a better idea of the amount of court time we will need.

I will also be bringing a motion to preserve the property that is not forfeited in the criminal case  
with respect to the Montagues.

Yours truly,

James McKeachie,  
Senior Counsel

Court File No. 05-138

ONTARIO  
SUPERIOR COURT OF JUSTICE

ATTORNEY GENERAL OF ONTARIO

**Applicant**

- and -

**2269 HIGHWAY #105, RUGBY TOWNSHIP, (IN REM) AND MONTY'S GUNSMITHING INC.,  
WILLIAM BRUCE MONTAGUE, AND DONNA JEANNE MONTAGUE****Respondents****APPLICATION UNDER THE CIVIL REMEDIES ACT, 2001****NOTICE OF APPLICATION****TO THE RESPONDENT**

A LEGAL PROCEEDING HAS BEEN COMMENCED by the applicant. The claim made by the applicant appears on the following page.

THIS APPLICATION will come on for a hearing on February 23, 2011 at 10:00 in the morning, at the Court House located at 216 Water Street, Kenora, Ontario.

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the application, you or an Ontario lawyer acting for you must forthwith prepare a notice of appearance in Form 38A prescribed by the Rules of Civil Procedure; serve it on the applicant's lawyer or, where the applicant does not have a lawyer, serve it on the applicant, and file it, with proof of service, in this court office; and you or your lawyer must appear at the hearing.

IF YOU WISH TO PRESENT AFFIDAVIT OR OTHER DOCUMENTARY EVIDENCE TO THE COURT OR TO EXAMINE OR CROSS-EXAMINE WITNESSES ON THE APPLICATION, you or your lawyer must, in addition to serving your notice of appearance, serve a copy of the evidence on the applicant's lawyer or, where the applicant does not have a lawyer, serve it on the applicant, and file it, with proof of service, in the court office where the application is to be heard as soon as possible, but at least four days before the hearing.

IF YOU FAIL TO APPEAR AT THE HEARING, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO OPPOSE THIS

APPLICATION BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE  
AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

Date: October 18, 2010

Issued by:

*Hoochizn*

Local Registrar  
216 Water Street  
Kenora, Ontario  
P9N 1S4

TO: William Bruce Montague  
2269 Highway # 105,  
Rugby Township, Ontario

TO: Donna Jeanne Montague  
2269 Highway # 105,  
Rugby Township, Ontario

OR AT:

Thunder Bay Correctional Centre  
Hwy 61 S.  
Box 1900  
Thunder Bay, ON  
P7C 4Y4

TO: Monty's Gunsmithing Inc.  
2289 Highway # 105,  
Rugby Township, Ontario

TO: Douglas H. Christie  
Barrister and Solicitor  
P.O. Box 24062  
4420 West Saanich Road  
Victoria, B.C.  
V8Z 7E7

Counsel for William Bruce Montague and  
Donna Jeanne Montague

**APPLICATION**

The applicant, the Attorney General of Ontario makes application for:

1. Forfeiture of 2269 Highway # 105, Rugby Township (PIN: 42058-0046 (LT)) ("the real property") and other property seized by police in September 2004, but not forfeited in criminal proceedings, to the Crown in right of Ontario, pursuant to sections 3(1) and 8(1) of the Civil Remedies Act.
2. Costs of this application.
3. Such further and other order as this Honourable Court may deem just.

The grounds for the application are:

1. 2269 Highway # 105, Rugby Township (the "real property") is owned by William Bruce Montague and his wife Donna Jeanne Montague. It is also where they carry on their business of buying, selling, repairing and building firearms. It is also the location specified as the business location of Monty's Gunsmithing Inc.
2. There has been no licence to carry on any business involving firearms as of 23 November 2002.
3. William Bruce Montague did not have a licence to possess, acquire, transport or carry firearms as of 05 November 2003.
4. Donna Jeanne Montague did not have a licence to possess, acquire, transport or carry firearms as of 27 March 2004.
5. William Bruce Montague was arrested at the Dryden gun show, rather than at his home for officer safety reasons on September 11, 2004. At that time police recovered the firearm that he had been carrying around the exhibition room that

had disappeared after his arrest, a .22 caliber Cooley rifle lying on a display table.

The rifle had a sign attached to it that read:

"For Sale - Unregistered Cooley Collectable 100 % Original (Incl. Magazine)"

Make: Cooley Model: Sure shot .22 Lr. Semi-auto. 10 shot Price: \$200."

6. On September 11, 2004 and September 20, 2004 after the arrest of William Bruce Montague, police executed search warrants at the real property.
7. Found in the shop area of the building was a 2004 price list showing the rates for work to be done on firearms.
8. The shop area in the basement contains the equipment necessary to alter and make firearms and associate items. There was a large lathe, which was likely used to manufacture the silencers.
9. There is a shooting tunnel hidden behind a cupboard, which would enable the test firing of weapons without being seen outside.
10. Found at the real property was a secret room located behind a bathroom wall that was accessed by inserting a nail into knot in the pine board wall and exerting pressure. The room contained a cache of firearms and materials related to firearms.
11. Police found printed materials on growing marihuana. Police also found a recently built building on the real property close to the house in which there is a framed wooden floor. Police removed part of the floor to discover another hidden room. This room was not being utilized for anything at that point. This room was heated from the main house with the wood heat system. This room could be utilized for more illegal storage or a marihuana grow operation. The reason a

marihuana grow operation is likely is that's materials were found that explain how to grow marihuana. The growing of marihuana is an illegal act in Canada.

12. Police were concerned when they located the following:

- a. Loaded firearms on the main floor and in the workshop areas;
- b. Dynamite, detonation cord and detonators;
- c. Hand grenade;
- d. .22 semi-automatic handgun with homemade silencer;
- e. Uzi submachine pistol;
- f. Sten submachine gun;
- g. Luger submachine pistol with serial number ground off;
- h. Several assault-type rifles;
- i. Homemade .50 caliber rifle;
- j. Sawn off 12 gauge shotguns;
- k. AR15 rifle loaded with an over capacity magazine with a silencer, a barrel mounted flashlight and a laser sight;
- l. Thompson Semi-Automatic hidden in a guitar case;
- m. Two homemade silencers;
- n. Night vision goggles;
- o. Thousands of rounds of ammunition; and
- p. Bullet proof vests;

13. Police found a number of loaded weapons while searching the residence including:

- a. In the master bedroom on the main floor of the residence police located a 12 gauge pump action Mossberg shotgun, serial number concealed leaning up against a wall in the closet of the master bedroom. The

shotgun had five live rounds of ammunition loaded into it, into a magazine tube. The magazine tube was an extended tube, able to take eight rounds of ammunition. On the side of the firearm, there was an additional six rounds of live ammunition in an ammunition holder that was riveted to the side of the gun. The gun was loaded with five rounds of bird shot ammunition and the safety was off, meaning that with one rack of the pump action, the weapon would be ready to be discharged. There was no form of trigger lock and no attempt at making it inaccessible to children in the residence or anyone else who might enter the building.

- b. A Colt AR-15 Semi-Automatic .223 caliber assault type rifle was located just inside the entrance to the hidden room. The firearm had a prohibited magazine containing 30 live rounds of ammunition inserted in the magazine well. It was equipped with what appears to be a homemade silencer as well as a barrel mounted laser sight. There were over 10,000 rounds of .223 caliber ammunition seized from the hidden room. This firearm was one of the firearms that had been registered to the William Bruce Montague. A field test has revealed that this firearm may have been converted to fully automatic but expert examination is necessary to confirm this. The firearm is a restricted firearm but if it has been converted to fully automatic it is a prohibited firearm. Located with this firearm were five additional prohibited magazines, two of which were loaded with 30 rounds of live ammunition and the other three were loaded with 20 rounds of live ammunition.
- c. Also near the entrance to the hidden room, police located a shoulder holster containing a 9 mm semi-automatic handgun. This is a restricted

firearm. The firearm had a prohibited magazine inserted in the magazine well containing 15 live rounds of .9 mm ammunition. There was also a loaded round in the chamber of the weapon. In addition to this, there was a pouch on the holster that contained 2 further prohibited magazines that each contained 14 live rounds of 9mm ammunition. This firearm was not registered to the Mr. Montague. In the hidden room, police also found approximately 5,000 9mm rounds of ammunition including 60 hollow point rounds.

14. Upon executing the search warrants it was found that, although there was no business licence to carry on a business involving firearms nor were there any firearms licences for any persons at the real property to own, possess, transport or carry firearms or ammunition, there were found the following:

Item	Serial Number
Mossberg 12 gauge shotgun	W894819M
Smith & Wesson .38 Special frame	D417638
Smith & Wesson .38 Special frame	D830457
Smith & Wesson .38 Special frame	C723407
Smith & Wesson .38 Special frame	D110422
Ruger .357 Magnum	16152179
Colt frame .357 Magnum	E87708
Browning 7.65 calibre semi-automatic handgun	36551
Basque .32 calibre semi-automatic handgun	93155
Hebert Schmidt .22 calibre revolver	544678
Browning - Frame only - handgun	17445
Lee Enfield .303 calibre rifle	B518
Mossberg 12 gauge shotgun	
Winchester .22 calibre pump action	Altered / Removed

Marlin .22 calibre rifle with magazine	No Serial Number
Cooey .22 calibre bolt action rifle	No Serial Number
Lee Enfield Rifle barrel .303	No Serial Number
Winchester 12 gauge pump shotgun	L1204148
Winchester 300 magnum top load	283553
Bolt action barrel, no forestock, unknown caliber.	Unknown
Mossberg 12 gauge shotgun, semi-auto	SE0274
Remington .35 calibre rifle, pump action	44852
Remington 12 gauge shotgun, semi-auto	6167124
Cooey .22 calibre rifle, bolt action	No Serial Number
Cooey .22 calibre rifle, semi-auto	No Serial Number
Ruko Aimscor .22 calibre rifle, Semi	A628902
Marlin .22 calibre rifle, lever action	10133
Stevens .20 gauge pump action shotgun	C919672
Savage .22 calibre pump rifle	16651
Browning 12 gauge semi shotgun	421PR02313
Browning 12 gauge semi shotgun	761NM03325
Savage .22 calibre bolt action rifle	No Serial Number
Husqvarna Unknown calibre bolt action rifle	663522
Carl Gustafs Stads bolt action rifle, unknown calibre	10036 (partially altered)
Winchester 7 mm Magnum bolt action	G1446688
Lakefield Mossberg 12 gauge pump	J540401
Savage .223 calibre bolt action rifle	C499539
Tradition Inc black powder .50 calibre rifle	240574
Mossberg .22 calibre rifle	8851
JC Higgins .20 gauge bolt action shotgun	No Serial Number
Savage bolt action, Unknown cal	No Serial Number
Winchester 30-30 lever action rifle	3950578
Carl Gustafs Stads .223 Bolt action rifle	133439

Marlin .45 / 70 calibre lever action rifle	0161606
Browning 12 gauge semi shotgun (without receiver)	3A44413
Fusil Perfax Brevete 12 gauge semi shotgun	100685
Marlin .22 calibre bolt action rifle	23784906
Lee Enfield .303 calibre bolt action rifle	6289
Ithaca 12 gauge pump shotgun	873332
Stevens 12 gauge pump action shotgun	No Serial Number
Unknown make .308 calibre bolt action rifle	7230
Cooey .22 calibre rifle	CA075861
Cooey .22 calibre Sure Shot semi-automatic with magazine	Unknown
Piece of receiver, unknown make or calibre	2407256
Ruger .357 Magnum revolver	152-18171
Smith & Wesson .38 Special revolver	33747
Thompson Centre Arms single shot .22 cal	A7435
Thompson Centre Arms barrel from 45 - 410	No Serial Number
Smith & Wesson .22 calibre revolver handgun	K758675
Colt .22 single action	654781
Revolver - unknown make, model, caliber	77707
Amadeo Rossi SA .38 Special revolver	Q717
Smith & Wesson .22 calibre semi auto handgun	A115570
Smith & Wesson .367 calibre revolver	N49282 or 41496
Colt .38 calibre revolver	366645
Ruger .44 Magnum revolver	86-00614
Revolver, unknown make/cal	8213
B. Whitney N. Haven revolver, unknown cal	19234K
Pepperbox handgun, unknown cal	176
Ruger .357 calibre magnum revolver	170-07021
Smith & Wesson .38 calibre revolver	84765
Smith & Wesson .38 Special revolver	470615

Smith & Wesson .38 Special revolver	89882
Browning semi-automatic 9 mm	246RR87624
Casull's Improvement Freedom Arm .22 magnum revolver	834995
North American Arms .22 calibre long rifle revolver	V24412
Colt semi-automatic 10 mm	FG98789
Ruger .22 calibre semi-automatic handgun	216-609-39
Walther PPK dual, 7.65 mm / 32 calibre semi-automatic handgun	286776
Pedersoli Single Shot 44 Caliber Handgun	14495
Smith & Wesson handgun frame, unknown calibre	8D97157
Euroarms .38 calibre black powder revolver	35032
Smith & Wesson .38 Special revolver	83113
Smith & Wesson .38 Special revolver	48559
Ruger .22 Calibre semi-automatic handgun	A10000
Smith & Wesson .44 magnum revolver	BFD3443
AMT .380 Calibre Semi-Automatic Handgun	G05083
Derringer .38 calibre Special handgun	24097
Bryce Arms .380 calibre semi-auto	110977
Hoppe double barrel black powder handgun	S04335
Jennings .22 calibre semi-automatic handgun	702106
Ruger P38 semi-automatic handgun, unknown cal	4994
Ruger 9mm handgun	#606
FN 9 mm semi-automatic handgun	78013A
Colt semi-automatic .45 calibre handgun	K04624
.32 calibre FN semi-automatic 7.65 mm	487771
Action Arms .45 calibre Uzi sub-machine gun	No Serial Number
Sten sub-machine handgun	4L9943
Luger 9mm sub-machine gun	Ground Off
H&R Arms Co 7.62 mm semi-automatic rifle	913493

Barrel, receiver & scope - M16	No Serial Number 5856012997777
Ruger .223 calibre semi-automatic rifle	187-50774
AK-47 5.66 X 45 mm rifle	845-280034
Norinco AK47 5.66 X 45 mm	Partial 845-1 (ground off)
Ruger .22 calibre semi-auto rifle.	No Serial Number
FN FAL 7.62 mm Converted Automatic Rifle	5307144
FN FAL 7.62 MM Semi-Automatic Rifle	BH4769
FN FAL 7.62 MM Semi-Automatic Rifle	BR0038
Homemade .50 calibre rifle	No Serial Number
Semi-automatic rifle, unknown calibre or make	13895B
Carl Gustafs Stads rifle, unknown cal	HK477916
International Harvester .30 calibre semi rifle	5170578
Ross .303 calibre rifle	5518
FN Bolt action rifle, unknown cal.	C6313
Ruger 300 Winchester Magnum bolt action	772-07025
Remington .308 calibre Winchester rifle	A6391D16
Homemade rifle, unknown cal, made from Smith & Wesson	
Remington .338 calibre Winchester Magnum bolt action	C6244269
BSA .22 - 250 calibre bolt action rifle	15R2780
Remington semi-automatic rifle, unknown cal	218559
Renegade Thompson Centre Arms black powder 54 cal	152028
.50 calibre black powder , unknown make or model	54656
.22 calibre bolt action rifle, unknown make or model	No Serial Number
Cooey .22 calibre bolt action rifle	No Serial Number
Cooey .22 calibre bolt action rifle	No Serial Number
Cooey .22 calibre bolt action rifle	CD072583
Cooey .22 calibre repeater rifle	No Serial Number
Ruger .22 calibre 10 - 22 carbine	11004257

JG Anschutz rifle GMBH .22 calibre bolt action	630839
Stevens .22 calibre semi-automatic rifle	No Serial Number
.22 calibre single shot rifle, unknown make	2231
Springfield .22 calibre repeater pump action	24005K
Stevens 12 gauge semi-automatic shotgun	No Serial Number
Lakefield Mossberg 20 gauge pump shotgun	H044743
Remington 12 gauge pump shotgun	S362834V
Double barrel 12 gauge shotgun, make unknown	7549
Springfield double barrel 12 gauge	80055
Topper H&R Arms single shot .410 cal	1587
Lakefield Mossberg bolt action .410 cal	911600
Marlin .22 calibre bolt action rifle	25601876
Remington Police Magnum pistol grip 12 gauge pump action shotgun	B335510M
Barrel for 12 gauge shotgun	No Serial Number
Double barrel 10 gauge shotgun, unknown make	13772
Winchester 30-30 calibre rifle	1198260
Cooey .22 calibre bolt action rifle	No Serial Number
FN FAL 7.62 MM Semi Automatic Rifle	09120
FN 7.62-mm	960-0071-59-Delta
Remington 12 gauge single shot shotgun	C18570
.30 calibre M1 semi-automatic rifle	3850586
Lee Enfield bolt action rifle, unknown cal	10L1744
U.S. Rifle 30 ml barrel & receiver	5736299
Cooey break action 12 gauge single shot	65645
Lithgow SHT LE .303 calibre bolt action	447768546
Lee Enfield .303 calibre bolt action rifle	No Serial Number
Barrel for a Remington 12 gauge shotgun	V992437M
Springfield double barrel break action 12 gauge	No Serial Number
Single shot 12 gauge, Unknown make & model	6861

Frame for a Remington shotgun	A791170M
Breda Brescia 12 gauge semi-automatic shotgun	43878
Ross .303 bolt action rifle	No Serial Number
Winchester 12 gauge pump action shotgun	737034
Stevens .22 calibre pump action rifle	1978
CBC 12 gauge pump action shotgun	07808
Safari Arms Over & Under 12 gauge shotgun	381493
Remington 30-06 calibre pump action rifle	A7004946
Over & Under 12 gauge shotgun, made in USSR	A12697
AR-15 .223 calibre semi-automatic rifle	SP216844
Sig Sauer P226 9mm handgun	U372078
Thompson .45 calibre semi-automatic carbine	21589
Stevens .410 calibre bolt action shotgun, no magazine	No Serial Number
.6.5 mm bolt action rifle, unknown make	No Serial Number
.22 calibre pump action rifle, unknown make	800249
Barrel & frame for Remington .308 calibre semi	8073593
Barrel for .22 calibre bolt action rifle	No Serial Number
Barrel & frame for Remington .308 cal	A7269986
Barrel & receiver, .22 calibre pump action rifle	341234
Riverside Arms 12 gauge shotgun, no stock	871
Stevens .22 calibre semi-automatic rifle, no stock	No Serial Number
Winchester Barrel for .308 calibre rifle	111516
Savage .308 calibre lever action rifle	C778258
Copey .22 calibre bolt action rifle	No Serial Number
CIL 12 gauge shot gun, no stock	810111
Copey 12 gauge single shot shotgun	550412
Mossberg .410 pump, no receiver	K338575
Lee Enfield .303 calibre rifle, no bolt	787
Mossberg .22 calibre bolt action rifle	No Serial Number

Mossberg .22 calibre bolt action rifle	No Serial Number
Browning .308 calibre lever action rifle	04367K47
Cobey .22 calibre semi-automatic rifle	No Serial Number
Lee Enfield bolt action rifle, no bolt, unknown cal	50468
Lee Enfield rifle, unknown cal	4600
Bolt action rifle, unknown cal, unknown make	6721
Budapest bolt action rifle, unknown cal	3112C
Cobey .22 calibre semi-automatic rifle	No Serial Number
Stevens .22 calibre semi-automatic rifle	No Serial Number
Shotgun barrel, unknown make, unknown cal, no stock	No Serial Number
Wooden stock & fore-end, rifle, unknown make or cal	No Serial Number
Smith & Wesson .38 Special revolver	D731625
Ruger .22 calibre target pistol, receiver only	21414330
Stevens unknown cal, receiver only	A947876
Wooden stock & trigger assembly	No Serial Number

15. As well, the following were found in the building:

- a. U.S. Navy Seal Combat Manual;
- b. U.S. Army Manual on Camouflage;
- c. Army Training Rangers Manual;
- d. Long Range Patrol Operations: Reconnaissance, Combat, and Special Operations;
- e. .45 Automatic Manual;
- f. U.S. Marine Corps Technical Manual;
- g. The Modern Rifle Barrel;
- h. Manual- Great Silencers of the Past;
- i. Black Book Companion - State of Art Improvised Munitions;
- j. Flash Powder Cookbook;

- k. U.S. Army Improvised Munitions Handbook;
- l. Manual- Secret Two Component High Explosive Mixtures improvised shaper charges;
- m. Army Manual - Unconventional Warfare Devices and techniques-Incendiaries;
- n. Army Manual- Booby Traps;
- o. Army Manual -- Surveillance;
- p. Conversion Manual- Full Auto H&K 94;
- q. Suppressors - Volume Two - Ruger 10/22 Integral Suppressor;
- r. Conversion Manual- Full Auto for Semi-Automatic Thompson;
- s. Manual- Full Auto Conversion for AK 47;
- t. Manual- Full Auto Conversion for Ruger Mini 14;
- u. Manual - Full Auto Modification for AR 15;
- v. Manual (X1) - Full Auto - SKS;
- w. Home Workshop Parkerizing;
- x. Owners Manual (X4) - SKS, AKS, AK47;
- y. Instruction Manual- 5.56 mm semi-automatic rifles;
- z. Trapping Guide;
- aa. Book - Merck Manual (Medical Book);
- bb. U.S. Army Ranger Handbook;
- cc. Uzi-SMG Operation Manual;
- dd. Book on Natural Remedies;
- ee. Wilderness Harvest;
- ff. Manual for Model AT -9 Semi-Automatic Handgun;
- gg. Lyman Reloading Guide;

- hh. Book - Rifles and Riflemen at the Battle of King's Mountain;
- ii. FN - F.A.L. Auto Rifle (7.62 mm);
- jj. Manual - How to Prepare and Conduct Military Training;
- kk. Army Manual - Combat Training of the Individual soldier and patrolling;
- ll. Instruction Pamphlet - Combat Training of the individual soldier and patrolling;
- mm. Marijuana Growers Guide (with parts highlighted);
- nn. Cannabis Culture Magazine (Feb-Mar 2004);
- oo. Maadi-Griffin .50 Calibre Rifle Plans with Order Form dated 13 Dec 1997;
- pp. Manual - Construction of a Simplified Wood Gas Generator;
- qq. Manual - The Poor Mans James Bond Volume I (inside it was an index apparently created on separate paper);
- rr. Granddads Wonderful Book of Chemistry;
- ss. Reborn in Canada - Personal Privacy through a new Identity (1991);
- tt. Book on Gunsmithing;
- uu. Book - Get Even: The Complete Book of Dirty Tricks;
- vv. The Best Book Catalog In the World (with six supplements);
- ww. Magazine - Survivor (1993);
- xx. Professional Electronic Equipment Catalog;
- yy. Magazine - Paladin Press - Home Workshop Guns - ARI5/M16 for defence and resistance;
- zz. Manual on Smoke Generation;
- aaa. Manual on Explosives and Propellants from Commonly Available Products (with areas highlighted);
- bbb. Magazine - Paladin Press - Weapons and Warfare - Paladin zeros in on the arts of sniping, ambush, and suppressing firearms;

- ooo. Delta Press Catalogue - Laser Sight and Night Vision Devices;
- ddd. Butokukai Catalogue (list of publications including silencers, explosives, harassment, full auto, new Ld./personal freedom);
- eee. Automatic Conversion Manual for the Remington 1100. This had a hand written yellow note on it stating: Bruce, Let me know how these work out if you try it - Also, stay clear of the "Pole Man". It was signed "Rick";
- fff. AR 15 to M-16 Conversion Book;
- ggg. Mini 14 Exotic Weapons System Manual;
- hhh. Mini 14 Select-Fire conversion;
- iii. Micro 421 Machine Pistol- Semi-Auto Modification Manual;
- jjj. Manual- Select Fire 10/22 - The TEK Full Auto Conversion;
- kkk. Select Fire Ak47 - Conversion Manual;
- lll. Manual- Full Auto Conversion of the Ruger 10-22 Semi
- mmmm. Automatic Carbine;
- nnn. U.S. Army manual on Silencers;
- ooo. Various loose papers including:
- i. Hand drawn plans depicting a pen gun dated Oct 7, 1994
  - ii. Two Computer Printouts (older - perforated edges) re: Anarchy for Fun and Profit - One had a statement on it Note: "To any Law Enforcement Agency - FUCK OFF! This file is intended to promote general havoc and anarchy and you can't do a god damn thing about it pigs" and the other had a statement on it "Note: To Law Enforcement Type People: This file is intended to promote general havoc and anarchy and since your going to be the first assholes up against the wall- there isn't a damn thing you can do about it pigs"

III. Computer Printouts (older - perforated edges) addressing subjects:

1. detonators,
2. incendiaries,
3. smoke formulas,
4. rocket fuels,
5. flamers,
6. tear gas and related items,
7. Thermite Incendiaries and formulas,
8. vomiting gas,
9. mines,
10. shoddy explosives,
11. file directory of Lib Nasties.

ppp. Receipts; material lists, plans for building;

qqq. Magazine Article on Reflex Suppressors;

rrr. Magazine Article on .45 ACP;

sss. Magazine Article on Phoenix Shotgun;

ttt. Video - Outdoors Survival Techniques;

uuu. Video - Ultimate Sniper "The Video";

vvv. Video - Dillon Machine Gun Magic;

www. Manual - Wilderness Survival;

xxx. Manual - Homemade C-4- A recipe for survival (areas of this are highlighted);

yyy. The Anarchist Handbook - Topics:

- I. Improvised Blasting, Pipe;
- II. Hand Grenade, ..

- iii. Shotgun Grenade Launcher;
  - iv. Improvised Claymore Mine;
  - v. Plastic Explosives, and
  - vi. Rocket Launchers.
- zzz. U.S. Army Manual on Booby Traps;
- aaaa. Manual- Home Workshop Explosives (hand written comment excellent book on it) (areas of manual are highlighted);
- bbbb. Manual- Sten submachine Gun;
- cccc. U.S. Army manual on unconventional warfare devices and techniques - Incendiaries (hand written comment "good");
- dddd. U.S. Army manual on Unconventional warfare devices and techniques - References (hand written comment "poor");
- eeee. U.S. Army manual on sniper training and employment;
- ffff. Book - Total Resistance: Swiss Army Guide to Guerrilla Warfare and Undergound Operator;
- gggg. Combat Survival Course Notes;
- hhhh. U.S. Army manual- Biological and chemical defense Manual;
- iiii. Hand drawn plans re his "shooting house";
- jjjj. Manual- Night Fighters Handbook; and
- kkkk. Manual- Long Range Surveillance.

#### **The Civil Remedies Act**

16. This application is made pursuant to Rule 14.05(2) of the *Rules of Civil Procedure* and sections 3(2) and 8(2) of the *Civil Remedies Act*.

17. There are reasonable grounds in this case for the court to find that both the real property and the property seized by police are proceeds of unlawful activity or an instruments of unlawful activity within the meaning of the Civil Remedies Act and should be forfeited to the Crown in right of Ontario.
18. Such further and other grounds as counsel may advise and this Honourable Court may permit.

The following documentary evidence will be used at the hearing of the application:

1. Application Record with Supporting Affidavits; and
2. Such further and other evidence as counsel may provide and this Honourable Court may permit.

Dated: October 18, 2010. James McKeachie, LSUC #32985A

Civil Remedies for Illicit Activities Office (CRIA)  
Ministry of the Attorney General, Legal Services  
Division

Tel: 416-314-5881  
Fax: 416-314-3714  
Counsel for the Applicant, the  
Attorney General Of Ontario.

- Mailing address and courier deliveries:  
77 Wellesley Street West  
P.O. Box #555  
Toronto ON M7A 1N3
- Address for service of documents:  
720 Bay Street  
8<sup>th</sup> Floor  
Toronto ON M7A 2S9

Attorney General of Ontario

2268 Highway #105, Puggy Township (In Rem)  
and Monty's Gunsmithing Inc., William Bruce  
Montague, and Donna Jeanne Montague  
Respondents

and

Applicant

Court file no. 05-138

-

Attorney General of Ontario

ONTARIO  
SUPERIOR COURT OF JUSTICE  
Proceedings commenced at KENORA

NOTICE OF APPLICATION

(Application under the Civil Remedies Act, 2001)

James McKeachie

Counsel

LSC # 32985A

Tel. 416-314-5881

Fax. 416-314-3774

Ministry of the Attorney General

Legal Services Division

Civil Remedies for Risk Activities Office (CRRA)

Counsel for the Applicant

The Attorney General of Ontario

Mailing address and courier delivery:

77 Wellesley Street West  
P.O. Box #555  
Toronto ON M5A 1N3

Address for service of documents:  
720 Bay Street  
5<sup>th</sup> Floor  
Toronto ON M5A 2S9