

**ONTARIO**

**SUPERIOR COURT OF JUSTICE**

BETWEEN:

**CHARLES C. ROACH, ASHOK CHARLES, MICHAEL MCATEER AND  
HOWARD JEROME GOMBERG**

Applicants

-and-

**THE ATTORNEY GENERAL OF CANADA**

Respondent

**AFFIDAVIT OF SIMONE E.A. TOPEY**


I, SIMONE E.A. TOPEY, affirm as follows:

1. I was born in the country of Jamaica in 1966.
2. I immigrated to Canada in 1978.
3. I have been a permanent resident of Canada since 1981.
4. Canada is my home. I would like to be a Canadian citizen.
5. I would like to have the convenience of being able to travel on a Canadian passport.
6. I want to be able to vote in elections.
7. I am a Rastafarian. One of the beliefs of the Rastafarian religion is that the current society is Babylon. The Queen, as the head of state of Canada, would be regarded then as the

head of Babylon. It would deeply violate my religious belief to take any kind of oath to the person who is the head of Babylon.

8. I have not applied for citizenship because I know that the oath to the Queen is required and that I could not take such an oath.
9. I have no objection whatsoever to taking an oath that I will faithfully observe the laws of Canada and fulfill my duties as a Canadian citizen if I am granted citizenship.
10. If the part of the current citizenship oath that refers to the Queen and her heirs was removed, I would apply for citizenship.
11. I want to be able to participate in political movements whose goals include abolishing the monarchy. If I took the citizenship oath to the Queen, I would feel bound by that oath to refrain from participating in such political movements.
12. I affirm this affidavit to provide evidence on the Application herein and for no other or improper purpose.

Affirmed before me this 4<sup>th</sup> day of)  
October 2012 at (TORONTO, ONT.)

  
A Commissioner, Etc.

Peter Rosenthal

  
SIMONE E.A. TOPEY