



Court File No. CJ-26-00001565-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

ETIENNE VINCENT MARIO GADBOIS

Plaintiff

- and -

MICHEL VACHON

Defendant

STATEMENT OF CLAIM

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff. The Claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a Statement of Defence in form 18A prescribed by the Rules of Civil Procedure, serve it on the Plaintiff's lawyer or, where the Plaintiff does not have a lawyer, serve it on the Plaintiff, and file it, with proof of service, in this court office, WITHIN TWENTY DAYS after this Statement of Claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period of serving and filing your Statement of Defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a Statement of Defence, you may serve and file Notice of Intent to Defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your Statement of Defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and \$4000 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believed the amount claimed for costs is excessive, you may pay the plaintiffs claim and \$400 for costs and have costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date 27-APR-2026

Issued by *Angela Morrison*
Local Registrar

Address of court office: 50 Eagle Street West
New Market Ontario
L3Y 6B1

TO: MICHEL VACHON
50 Rue Nordet,
Sherbrooke, Quebec
J1R 0L3

THIS ACTION IS BROUGHT AGAINST YOU UNDER THE SIMPLIFIED PROCEDURE PROVIDED IN RULE 76 OF THE RULES OF CIVIL PROCEDURE.

CLAIM

The Plaintiff claims:

- a) Judgment against the Defendant in the amount of \$150,000.00, representing the sum suffered by the Plaintiff pursuant to parental alination and economic prejudice.
- b) Judgment against the Defendant for interest at the rate of 6% per annum, calculated from April 24, 2024 to the date of judgment, in accordance with the agreement between the parties.
- c) In the alternative, the Plaintiff claims pre-judgment interest on the sum of \$150,000.00 pursuant to section 128 of the Courts of Justice Act, R.S.O. 1990, as amended, from the date of demand to the date of judgment.
- d) In the alternative, the Plaintiff claims post-judgment interest pursuant to section 129 of the Courts of Justice Act, R.S.O. 1990, as amended.
- e) If applicable, judgment against the Defendant for punitive and exemplary damages in an amount to be determined by this Honourable Court;
- f) Costs of this action on a substantial indemnity basis, together with any goods and services tax which may be payable on any amount pursuant to the *Excise Tax Act*, R.S.C., 1985, as amended and applicable disbursements; and
- g) Such further and other relief as this Honourable Court deems just.

BACKGROUND INFORMATION

1. The Plaintiff, Étienne Vincent Mario Gadbois, is the biological father of four (4) minor children and resides in the Province of Ontario.
2. The Defendant, Michel Vachon, is the maternal grandfather of the said children.
3. At all material times, the Plaintiff maintained a close, loving, and active parental relationship with his children and was meaningfully involved in their upbringing.
4. Beginning on or about April 24, 2024, and continuing up until now (the "Material Period"), the Defendant engaged in a deliberate, sustained, and malicious course of conduct designed to interfere with, undermine, and ultimately damage the Plaintiff's relationship with his children.
5. The Plaintiff pleads that the Defendant repeatedly made disparaging, demeaning, and negative statements about the Plaintiff to the children, thereby eroding their respect, trust, and emotional bond with him.
6. The Defendant actively encouraged and reinforced negative attitudes toward the Plaintiff, including fostering resistance, fear, and hostility in the children toward their father.
7. The Plaintiff further pleads that the Defendant wrongfully interfered with communications and access between the Plaintiff and his children, whether directly or indirectly, and contributed to the obstruction of the Plaintiff's parental role.
8. The Defendant's conduct was persistent, intentional, and carried out with full knowledge that it would harm the Plaintiff and disrupt the parent-child relationship.
9. The Plaintiff pleads that the Defendant's actions constitute a pattern of psychological manipulation and undue influence over the children, the effect of which has been to alienate them from the Plaintiff.

21. The Defendant has now ceased all communication with the Plaintiff.

CONCLUSION

22. The Plaintiff pleads that the Defendant is dishonest and caused significant economic prejudice to the Plaintiff;

23. The Plaintiff pleads that the Defendant must pay an amount of \$150,000 in favor of the Plaintiff;

24. The Plaintiffs propose that this action be tried at the Town of Newmarket, in the Province of Ontario;

25. The Plaintiff has performed all conditions precedent necessary to entitle the Plaintiff to judgment.

Dated: April 27, 2026

Lawyer for the Plaintiff
Valeriy Kurzhev
901-235 Gosford Blv
North York, Ontario, M3N 2W3

ETIENNE VINCENT MARIO GADBOIS

Plaintiff

MICHEL VACHON

Defendant

Court File No. CV-



SIGNIFIÉ
274226 1745 hrs
[Handwritten signature]

ONTARIO
SUPERIOR COURT OF JUSTICE

Proceeding commenced at Newmarket

STATEMENT OF CLAIM

V KURZHEV LAW

Valeriy Kurzhev

Barrister and Solicitor

901-235 Gosford Blvd.

North York, Ontario

M3N 2W3

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Lawyer for the Plaintiff