

ONTARIO
SUPERIOR COURT OF JUSTICE

B E T W E E N:

STEVEN REYNEN

Applicant
(Appellant)

- and –

DR. TABITHA ROGERS

Respondent
(Respondent in Appeal)

NOTICE OF CONSTITUTIONAL QUESTION

The appellant intends to question the constitutional validity and to claim a remedy under subsection 24(1) of the Canadian Charter of Rights and Freedoms of

Sections 21(1)2 and 35 of the Health Care Consent Act, 1996, S.O. 1996, c. 2, Sched. A., as amended.

in relation to an act or omission of the Government of Ontario.

The question is to be argued on *October 17, 2025 at 10:00*, at the Ottawa Courthouse *161 Elgin Street, 2nd Floor, Ottawa*.

The following are the material facts giving rise to the constitutional question:

1.The Appellant is a Christian

2.The Bible is the Word of God

1.Romans 13

2.Romans 14:23

1.Pyschotropics are sin (see the advance directive for some reasons why)

3.Luke 17:1-3

3.Psychotropics are Pharmakeia and Pharmakeia is sin.

4.Hunger and Water striking to death (if need be) is lesser sin than being forced to submit to Pharmakeia.

1.The right to die is to be respected. To forcefully feed and hydrate him would be torture. He is already being double-bound into being lured into sin. If he dies by such a hunger and water strike he would have been walked to suicide by the parties involved.

5.The appellant told hospital staff immediately at The Ottawa Hospital: The Civic Campus and at The Royal Ottawa Mental Health Centre upon arrival that he considered their treatment to be sin.

6.The appellant wrote an advance directive (wish) on July 7, 2024 which stated both matters of conscience and religious beliefs as rationale as to why he never wished to be treated with psychotropics again while he was mentally capable.

1.“I never, ever, wish to be put on any psychotropic medication (including anti-psychotics, anti-depressants, etc.) ever again. Under any circumstance.”

2.As a human being:

1.The psychotropics damaged my physical health. They caused me to gain over 200 pounds. This caused me to develop heart problems and pre-diabetes. I was told that I was at risk for stroke and heart failure. I had to resist more prescriptions than this – which could have resulted in severe polypharmacy.

2.The psychotropics damaged my cognition. This interfered with my ability to think and do things.

3.The psychotropics sedated me. This caused me to sleep most of the day away and severely limited my ability to do things.

4.The psychotropics damaged my ability to feel. This scares me the most. God willing this is not irreversible– and I am experiencing more emotion again presently.

3.As a Christian:

1.The scariest piece for me is the dampening of my ability to feel love.

2.There are so many quotes in the bible stressing the importance of feeling love for one another.

3.If you don't believe me, just do a quick search.

4.I am not saved by my capabilities. Most days I am reminded of my failings.

5.I am saved by what Christ Jesus did for me at Calvary. Period. And I know it is unmerited.

6.All this being said.

7.This is my only wish I care to state while I am mentally capable.

8.I never wish to be put on psychotropics ever again.

7.The appellant has no criminal record, and has never been charged with a crime, let alone convicted.

8.The appellant never held a knife to his father's neck, nor did he threaten him with violence. He did however repeatedly tell his parents that his body movements were being forcibly controlled by either no-touch torture, satanic ritual abuse, or alternate personalities (Dissociative Identity Disorder). He also told them that he was trusting God that he would never be permitted to harm another despite the loss of control. There is a lot of hearsay surrounding events that transpired leading up to his hospitalization.

9.The appellant, despite being spit on, struck by, threatened, harassed, emotionally and psychologically abused by both patients and staff, as documented on <https://reynen.ca> has

never been violent with anyone during either hospitalization either at The Ottawa Hospital: Civic Campus, or The Royal.

10. The appellant was treated, despite being telling hospital staff psychotropics were both pharmakeia and sin and despite his wishes being made known to the treatment team, on March 11, 2025 at The Royal after being deemed mentally incapable to consent to treatment pursuant to 32(1) of the Health Care Consent Act on January 29, 2025. This infringed upon his freedoms guaranteed by Section 2(a) of The Charter.

11. The appellant was repeatedly treated, despite telling hospital staff psychotropics were both pharmakeia and sin and despite his wishes being made known to the treatment team, during his hospitalization at The Ottawa Hospital Civic Campus after being deemed mentally incapable to consent to treatment pursuant to 32(1) of the Health Care Consent Act on January 29, 2025 and pursuant to Section 25 of the Health Care Consent Act, despite Section 26 of the Health Care Consent Act. This infringed upon his freedoms guaranteed by Section 2(a) of The Charter.

1. During one such treatment, a security guard yelled "F**K JESUS".

12. Pursuant to section 25 of the Health Care Consent Act on September 14, 2025 the appellant was treated in an emergency situation despite having already been mechanically restrained and almost naked and therefore posing no risk of harm to anyone, and all parties involved were aware of his wishes and that he considered psychotropics to be sin, despite Section 26 of the Health Care Consent Act, rendering this action illegal and arguably a instance of aggravated assault. This infringed upon his freedoms guaranteed by Section 2(a) of The Charter.

13. Dr. Tabitha Rogers has prohibited him from accessing his medical records to get the specifics to place on this form.

14. Dr. Tabitha Rogers repeatedly removed his access to his laptop and cellphone, pens, and paper, and other resources, which have thus interfered with his ability to self represent, and get a fair trial. This is obstruction of justice.

15. Dr. Tabitha Rogers has restricted his privileges, which infringe upon other rights and freedoms guaranteed by other sections of The Charter, including restricting him to the unit until he was before The Courts (Dr. Tabitha Rogers has said she never had a patient reach the Courts before).

1. (The appellant would greatly appreciate grounds privileges for the remainder of his hospitalization, and would never run away as Romans 13 and therefore respecting authority is important to him as both a Christian and as a man. (as repeatedly demonstrated already)

16. On April 9, 2025 Dr. Tabitha Rogers said the appellant was delusional for standard Christian beliefs. This is available on YouTube at <https://youtube.com/A9ig042INdk>, and <https://reynen.ca/resources/>. She also confirmed this on record at a Form A CCB hearing on August 27, 2025.

17. The appellants Notice of Appeal regarding his Form A Application to the Consent and Capacity Board was effectively blocked by the Courts.

1. His argument for contesting his Form 33 was that the surrounding legislation violated his Section 2(a) freedoms guaranteed by the Charter.

18. The appellant began a hunger and water strike on September 10, that lasted over six days, and ended during his seventh day when he felt complete loss of control of his body while remaining conscious, and was forced to both consume food and speak with staff at The Royal.
19. Dr. Tabitha Rogers has threatened to have him forcibly fed and hydrated should he hunger and water strike again until the point where there was a medical emergency rather than refrain from infringing upon his freedoms guaranteed by Section 2(a) of The Charter.

The following is the legal basis for the constitutional question:

1. *The first line of the Canadian Charter of Rights and Freedoms, the beginning of the Constitution Act 1982 (the highest law in Canada) states:*
 1. *Whereas Canada is founded upon principles that recognize the supremacy of God and the rule of law*
2. *Section 2(a) of the Canadian Charter of Rights and Freedoms states:*
 1. *Everyone has the following fundamental freedoms: (a) freedom of conscience and religion*
3. *The appellant is a Christian*
4. *The Bible is the Word of God*
5. *Romans 13*
6. *Romans 14:23*
7. *Luke 17:1-3*
8. *Psychotropics are sin.*
9. *Psychotropics are Pharmakeia and Pharmakeia is sin.*
 1. *Hunger and water striking to death is lesser sin than being forced to submit to Pharmakeia.*
 2. *The right to die is to be respected. To forcefully feed and hydrate him would be torture. He is already being double-bound into being lured into sin. If he dies by such a hunger and water strike he would have been walked to suicide by the parties involved.*
10. *The appellants wishes express both matters of conscience and religious beliefs as rationale as to why he never should be treated with psychotropics ever again, under any circumstance.*

Constitutional Challenge

1. *Section 21(1)2 and Section 35 of the Health Care Consent Act should be struck down as they are constitutionally invalid.*
 1. *The appellants wishes clearly express matters of conscience and religious beliefs as rationale.*

Constitutional Remedy

1. *While the appellant agrees that while it best that he remain either voluntarily or involuntarily in a hospital, under the care of a different doctor than Dr. Tabitha Rogers (one who doesn't hate*

Christians and abuse him) until he can be 100% sure that his body movements cannot be forcibly manipulated in the slightest (from either no touch-torture / satanic ritual abuse / alternate personality from DID), he should NEVER be treated under any circumstances, even emergencies, with psychotropics ever again, both for his matters of conscience and strongly held religious beliefs.

2. Measures should be taken to ensure his freedoms guaranteed by The Charter are never infringed upon again under any hospitalization in Canada.

2. In the alternative, the appellant asks that he may flee Canada, and seek refugee status elsewhere in the world where they would respect his religious freedoms which are protected by the United Nations Universal Declaration of Human Rights Article 18.

1. Canada is a member state of the United Nations.

2. The appellant intends to seek help from the United Nations should Canada continue to infringe upon his human rights and freedoms.

September 26, 2025

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Court file no.: CV-25-00099970-0000

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Proceeding commenced at Ottawa

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