

IN THE HIGH COURT OF AUSTRALIA
CANBERRA REGISTRY

BETWEEN:

ANTON TUTOVEANU
Plaintiff

and

COMMONWEALTH OF AUSTRALIA
Defendant

AFFIDAVIT

I, Anton Tutoveanu, of 490 Pitt Street, Haymarket NSW 2000, computer scientist, affirm as follows:

1. The written advice dated 24th July 2025 [Exhibit 'AT 2', pages 4-18].
2. The geographical location [Exhibit 'ME 1', pages 20-21].

AFFIRMED by the deponent
at Sydney in New South Wales
on 29th July 2025.

Before me:



Signature

*[name and qualification of
witness administering oath or affirmation]*

Carolyn Louise Johnston
A Justice of the Peace in and for
the State of New South Wales
Reg. No. 120020



Signature of deponent

IN THE HIGH COURT OF AUSTRALIA
CANBERRA REGISTRY

Affidavit of Anton Tutoveanu affirmed on 29th July 2025

INDEX OF EXHIBITS

| EXHIBIT | DESCRIPTION | PARAGRAPH | PAGE |
|---------|--------------------------|-----------|-------|
| AT 2 | Written advice, 15 pages | 1 | 4-18 |
| ME 1 | Cartography, 2 pages | 2 | 20-21 |

This is the annexure marked with the letter ^{AT 2} referred to in the Affidavit/Statutory Declaration of Anton Tutoveanu sworn/affirmed/declared before me at Sydney NSW on the 29th day of July 2025

IN THE HIGH COURT OF AUSTRALIA
CANBERRA REGISTRY

One page only
Page 1 of 16 pages

Carolyn Louise Johnston
A Justice of the Peace in and for
the State of New South Wales
Reg. No. 120020

CJ Johnston
Justice of the Peace Registration

BETWEEN:

ANTON TUTOVEANU
Plaintiff

and

COMMONWEALTH OF AUSTRALIA
Defendant

EXHIBIT "AT 2"

This is the exhibit marked "AT 2" produced and shown to Anton Tutoveanu at the time of affirming his affidavit this 29th July 2025.

Document of written advice

Before me

Solicitor/Justice of the Peace

IN THE HIGH COURT OF AUSTRALIA
CANBERRA REGISTRY

BETWEEN:

ANTON TUTOVEANU
Plaintiff

and

COMMONWEALTH OF AUSTRALIA
Defendant

WRITTEN ADVICE

INTRODUCTION

1. This advice is in relation to a lodgement of an originating application for Constitutional or Other Writ pursuant to s 75(v) of *Commonwealth Constitution* and ss 33, 38(e) of *Judiciary Act 1903* (Cth).

CHRONOLOGY

Procedural

2. On 9th July 2025, the plaintiff lodged documents with the High Court's DLS:
 - a. Application for Constitutional or Other Writ (**Form 12**)
 - b. Affidavit
3. On 10th July 2025, the plaintiff lodged another document:
 - a. Application (**Form 21**)
4. On 11th July 2025 the Deputy Registrar rejected the documents for filing due to purported non-compliance with the *High Court Rules 2004* (Cth).
5. On 14th July 2025 notes were sent to the plaintiff with reasons.

"Form 12 application for a constitutional or other writ

- The jurisdiction of the High Court to consider an application for constitutional and other writ pursuant to s75(v) of the Constitution is

limited to where such relief is sought against “an officer of the Commonwealth”. The defendant to your application is named as “Commonwealth of Australia”, which is not an officer of the Commonwealth. It is a matter for you to identify proper Commonwealth officers as a defendant/s.

- The relief you seek in Part I does not appear to be framed appropriately to seek relief by way of a constitutional writ against an officer of the Commonwealth, nor does it contain a satisfactory statement indicating on what basis the proposed matter would be within the High Court’s original jurisdiction. You have stated only “The criminal law governs the Commonwealth of Australia”. While it may be open to you to seek relief by way of mandamus (as you have raised this in Part III), you should seek this relief in Part I and identify each specific duty to be performed and the refusal to perform that duty, and not general statements. Your attention is also drawn to Rule 25.07.2 which provides that any application for mandamus shall be made within two months of the date of any refusal to perform that duty.
- Notwithstanding the above, I note that you will need to replicate each legislative provision you seek to rely on in Part VIII, and if over 1 page, this can be done by way of an annexure to the Form 12 (uploaded as a single PDF document). The text that you have currently annexed to the Form 12 is not required and will not be accepted for filing.
- You should also state the legal representative (or The defendant is self-represented), on the last page of the Form 12 where it states “To The Defendant, Commonwealth of Australia).

...

Form 21 application

- You have addressed this to the “Commonwealth of Australia, High Court of Australia”. I reiterate my comments above about the naming of an officer of the Commonwealth.
- Any Form 21 application, which can only be accepted if there is a current proceeding in the High Court (as it is an interlocutory application, not an initiating document), must be supported by an affidavit – see Part 13 of the *High Court Rules 2004*. That affidavit is separate to the Form 12 affidavit in support which serves a different purpose."

6. A series of correspondence ensued between the Registry and the plaintiff.

7. On 15th July 2025 the plaintiff replied.

"Can you confirm these filings were not rejected due to r 6.07.1 of *High Court Rules 2004* (Cth)?

Rather it appears r 2.03 of *High Court Rules 2004* (Cth) is the more suitable rule for addressing the alleged deficiencies.

Are you aware the Commonwealth of Australia may be vicariously liable for its officers?"

"See r 21.04 of *High Court Rules 2004* (Cth) as well."

8. The Deputy Registrar confirmed that the filings were rejected due to non-compliance with the *High Court Rules 2004* (Cth) and not due to a r 6.07 ruling of a single Justice.

9. On 17th July 2025 the plaintiff responded.

"The application specifies the Governor-General, AFP Minister and Minister for Foreign Affairs and Trade.

Do you agree the Commonwealth of Australia has vicarious liability for its officers?

I am asserting the Form 12 Application for a Constitutional or other writ is *substantially* complete and compliant with the Rules."

10. On 21st July 2025 the plaintiff responded.

"Would you agree that delay in these proceedings could have both domestic and international irreparable impact?"

11. The Registry reiterated its comments.

12. The plaintiff responded.

"I am asserting the application is compliant and the Registrar had no authority to refuse the filing.

After receiving my advice and clarification in emails on 17th and 21st July, does the Registry intend to rectify the lodgement?"

13. On 22nd July 2025 the Registry responded.

"If you press for the filing of your application, you will need to create a new case in the Digital Lodgment System and upload your documents to a fresh lodgement.

However, I draw your attention again to the instructive comments sent by Deputy Registrar Lee on 14 July 2025. If you lodge unrevised documents, please be aware that the Registrar considering your application may seek the direction of a Justice under rule 6.07 in respect of your application."

14. The plaintiff responded.

"I understand the Registrar's initial view to be that the application must explicitly list a Commonwealth officer as a defendant.

Due to the unknown amount of Commonwealth officers that may be involved in the related unperformed obligations, I only explicitly listed the Commonwealth of Australia as the defendant.

I assert this is valid because of principles of vicarious liability.

The application does actually contain several specifically named officers in the sought orders which the writ would be addressed to.

The substantive matter depends on the outcome of the interlocutory application which largely seeks declaratory relief.

At this stage, naming officers as explicit defendants could potentially be a risk and a waste of legal resources.

This is due to the determination of the interlocutory application being entirely independent of those officers, which has not been decided.

My next application, and the most appropriate next step, would be to seek leave to file the Form 12 dated 9th July 2025.

However I wish to avoid this and once again ask the Registry to review the lodgement with concession."

15. The Registry responded.

"I confirm the jurisdiction of the High Court to determine applications for constitutional writs pursuant to section 75(v) of the Constitution is limited to where such relief is sought against "an officer of the Commonwealth."

You do not need to "*seek leave to file the Form 12 dated 9th July 2025*" as a rule 6.07.2 direction has not been made in relation to it.

I note that "*you ask the Registry to review the lodgement with concession.*" You do not currently have any pending lodgement capable of review by the Registry.

As advised on multiple occasions, you will need to create a new case in the Digital Lodgment System and upload your documents to a fresh lodgement, if you wish for your documents to be considered for filing."

16. The plaintiff responded.

"It is not appropriate nor legally strategic to explicitly list Commonwealth officers as defendants at this stage in the proceedings.

The documents, as they were, as they are, are *substantially* complete and compliant.

The application is explicitly seeking a writ against the Governor-General, AFP Minister and Minister for Foreign Affairs and Trade.

The Commonwealth of Australia is vicariously liable.

If the interlocutory proceeding is successful, then I will amend the named defendants to those officers."

17. On 23rd July 2025 the plaintiff responded again.

"On 22nd July 2025, Deputy Registrar Bennett said:

If you lodge unrevised documents, please be aware that the Registrar considering your application may seek the direction of a Justice under rule 6.07 in respect of your application.

Rule 6.07.1 states:

"If a writ, application, summons, affidavit or other document (the document) appears to a Registrar on its face ... to fall outside the jurisdiction of the Court, the Registrar may seek the direction of a Justice."

I have corrected some minor spelling and re-lodged the Form 12 Application for a Constitutional or Other Writ dated 9th July 2025 and its accompanying Affidavit."

18. The plaintiff re-lodged the documents to a new case in the DLS.

FACTS

19. The originating application lists the **Commonwealth of Australia** as the defendant.
20. The originating application explicitly states the **Governor-General, AFP Minister and Minister for Foreign Affairs and Trade** in the orders sought to which a writ of mandamus is to be addressed to.

STATUTORY PROVISIONS

The Constitution (Cth)

21. *The Constitution* (Cth) initialises the powers of Australian courts to make orders in event of legal causes of action. It is the entry point of the law:

22. **"5. Operation of the Constitution and laws.**

This Act, and all laws made by the Parliament of the Commonwealth under the Constitution, shall be binding on the courts, judges, and people of every State and of every part of the Commonwealth, notwithstanding anything in the laws of any State; ..."

23. **"Chapter III.—The Judicature.**

71. Judicial power and Courts.

The judicial power of the Commonwealth shall be vested in a Federal Supreme Court, to be called the High Court of Australia, ..."

24. **"75. Original jurisdiction of High Court.**

In all matters—

...

(iii.) In which the Commonwealth, or a person suing or being sued on behalf of the Commonwealth, is a party:

...

(v.) In which a writ of Mandamus or prohibition or an injunction is sought against an officer of the Commonwealth:

the High Court shall have original jurisdiction."

Judiciary Act 1903 (Cth)

25. *Judiciary Act 1903* (Cth) legislates the judicature's powers within the Commonwealth.

26. **"Part IV—Original jurisdiction of the High Court**

...

33 Mandamus Prohibition Ouster of office

(1) The High Court may make orders or direct the issue of writs:

...

(c) commanding the performance of any duty by any person holding office under the Commonwealth; or

...

(e) of mandamus; or

...

(2) This section shall not be taken to limit by implication the power of the High Court to make any order or direct the issue of any writ."

27. **"Part VI—Exclusive and invested jurisdiction**

38 Matters in which jurisdiction of High Court exclusive

Subject to sections 39B and 44, the jurisdiction of the High Court shall be exclusive of the jurisdiction of the several Courts of the States in the following matters:

...

(e) matters in which a writ of mandamus or prohibition is sought against an officer of the Commonwealth or a federal court."

High Court Rules 2004 (Cth)

28. "Chapter 1—General rules

...

Part 2—Application and compliance with these Rules

...

2.02 Dispensing with compliance

The Court or a Justice may dispense with compliance with any of the requirements of these Rules, either before or after the occasion for compliance arises."

29. "Chapter 2—Proceedings in the original jurisdiction of the Court

Part 20—Commencing proceedings

20.01 Form of originating document

20.01.1 If the relief sought is or includes:

(a) a writ of mandamus or prohibition or certiorari, whether against an officer of the Commonwealth or some other person; or

...

a proceeding must be commenced in the Court by filing an application for a constitutional or other writ in accordance with Part 25.

..."

30. "Part 21—Parties

...

21.04 Misjoinder and non-joinder

A proceeding shall not be defeated because of the misjoinder or non-joinder of any party or person and the Court may determine all questions in the proceeding so far as they affect the rights and interests of the parties."

31. **"Part 25—Mandamus, prohibition, certiorari, habeas corpus and quo warranto**

25.01 Form of an application for a constitutional or other writ

25.01.1 An application for a constitutional or other writ must:

- (a) be in Form 12; and
- (b) be accompanied by one or more affidavits in support.

25.01.2 The application must be signed:

...

- (b) if the plaintiff is unrepresented—by the plaintiff.

25.01.3 The application:

- (a) must not exceed 12 pages; and
- (b) must be typed in at least 12 point (Times New Roman or equivalent font size) with line spacing of 1.5 lines.

...

25.02 Time for filing an application for a writ of mandamus or certiorari

25.02.1 An application for a writ of mandamus commanding a person to hear and determine a matter must be filed within 2 months after the day of the refusal to hear.

...

25.04 Parties to an application

25.04.1 A party who makes an application is a plaintiff, and each other party is a defendant.

25.04.2 A defendant must be referred to in the title of the proceeding:

(a) if the defendant is an officer of the Commonwealth, and a writ of mandamus or prohibition is sought against the officer—by the name of the office held; or

(b) in any other case—by name, or by the name of the office held by the defendant, or both.

25.05 Affidavits in support

25.05.1 An affidavit filed in support of an application must:

(a) state concisely:

(i) the factual background to the proceeding; and

(ii) the decision or conduct the subject of the application; and

(b) if the application is not filed within an applicable time limit, explain the failure to comply with that time limit.

25.05.2 The affidavit or affidavits in support of an application must exhibit such documents as are necessary for the proper determination of the application.

...

25.07 Response

25.07.1 A defendant must file and serve a response within 28 days from service of the application.

25.07.2 The response must be in Form 12A.

...

25.13 Writ of mandamus

25.13.1 Unless otherwise ordered by the Court or a Justice, a writ of mandamus must command the person to whom it is addressed to do the act in question or show cause why it has not been done.

25.13.2 A writ of mandamus must be in Form 13.

25.13.3 A writ of mandamus must be served on the person to whom it is addressed.

25.13.4 Unless otherwise ordered by the Court or a Justice, a writ of mandamus must be returnable within 14 days from service of the writ.

25.13.5 The person to whom a writ of mandamus is addressed must, within the time allowed by the writ, file and serve on the plaintiff an affidavit stating:

(a) that the act commanded by the writ has been done; or

(b) the reason why it has not been done.

25.13.6 If the act commanded by a writ of mandamus has not been done, the Court or a Justice may issue a writ of peremptory mandamus to enforce the command contained in the original writ, or may make any other orders necessary.

25.13.7 If the Court or a Justice directs that the command sought in an application for a writ of mandamus shall be peremptory in the first instance, the command may be expressed in an order of the Court without the issue of a writ and has the same effect as a peremptory writ of mandamus."

LEGAL PRINCIPLES

Early mandamus

32. *Ah Yick v Lehmert*¹:

"... The position is clearly stated in *Quick and Garran's Constitution of the Australian Commonwealth*, at p. 779. It is as follows:—"The principles established in *Marbury v. Madison* are very clear. Where a writ of mandamus is sought, the first question is whether the principles and usages of law warrant the issue of a mandamus as the proper remedy in the case; and if that question is answered in the affirmative, the question remains whether the [...] Court has jurisdiction over the parties or the subject-matter. If the mandamus is sought against a non-judicial officer, it is an exercise of original jurisdiction, and the Court can only act if the matter comes within the scope of its original jurisdiction." (That is the mandamus provided for by sub-sec. (v.) of sec. 75 of the *Australian Constitution*.) ... original jurisdiction is by sec. 75 (V.) given to the High Court in matters in which mandamus is sought against a non-judicial officer of the Commonwealth. That case was not provided for in the *United States Constitution*, and hence the decision in *Marbury v. Madison* that mandamus

¹ *Ah Yick v Lehmert* [1905] HCA 22; (1905) 2 CLR 593 (Barton J)

to a non-judicial officer was outside the powers of the Constitution, and that therefore the Act of Congress purporting to authorize the grant of such a mandamus was not valid. That additional jurisdiction, however, being given by our Constitution, it seems to me that there is nothing in the contention that, as sub-sec. (V.) of sec. 75 gives original jurisdiction to the High Court in that particular class of mandamus, it has an exclusive effect as to other cases of mandamus. In my opinion it is clear that sec. 75 (V.) was inserted to prevent doubts from arising by reason of the decision to which I have referred, and that it has no other effect than to add a new and distinct power to the powers which the High Court inherently possesses—I mean those which are necessary to secure that any other Court created or invested with federal jurisdiction by the Parliament does not either exceed, or deny the exercise of, its jurisdiction."

33. Randall v Northcote Council²:

"... a mandamus ... is a means of enforcing the performance of a public duty.

...

In *R. v. Mayor &c. of Fowey*, Abbott C.J. said:—"The general principle of the Court, in issuing a mandamus, is very well defined to be, that whenever it is the duty of a person to do an act, the Court will order him to do it," and Best J. said:—"A mandamus now will lie for the performance of any public duty." In *R. v. Payn* Lord Denman C.J. observed:—"I **disclaim entering into the general merits of the case. It is enough that a public duty is left unperformed.**" [emphasis]

The first question in every case where a mandamus is sought is to inquire what is the public duty. If it be a single ministerial act not involving discretion, ... the Court may compel its performance specifically (per Lord Kenyon C.J. in *R. v. Beeston*). But if it be an act involving discretion the Court will only see that the discretion is exercised. The general principle applicable to this case is thus stated by Lord Cairns L.C. in *Julius v. Lord Bishop of Oxford*:—"Where a power is deposited with a public officer for the purpose of being used for the benefit of persons who are specifically pointed out, and with regard to whom a definition is supplied by the legislature of the conditions upon which they are entitled to call for its exercise, that power ought to be exercised, and the Court will require it to be exercised." I therefore examine the by-laws to ascertain the duty and its nature.

² *Randall v Northcote Council* [1910] HCA 25; (1910) 11 CLR 100 (Isaacs J)

...

... There is, first of all, an absolute duty to consider, then a discretionary power to decide one way or the other, and in the event of a determination in the applicant's favour there is again an absolute duty to [perform]. Has there been any failure in the primary absolute duty to consider? It cannot be denied that persons entrusted with a statutory duty must, as Lord Loreburn L.C. expresses it in *Leeds Corporation v. Ryder*, "act ... honestly, and endeavour to carry out the spirit and purpose of the Statute." ... "

SUBMISSIONS

34. The Deputy Registrar alleges 8 distinct issues with the lodgement:

- a. Naming of the defendant in the originating application.

"The jurisdiction of the High Court to consider an application for constitutional and other writ pursuant to s75(v) of the Constitution is limited to where such relief is sought against "an officer of the Commonwealth".

The defendant to your application is named as "Commonwealth of Australia", which is not an officer of the Commonwealth."

- b. The generality of Part I.

"The relief you seek in Part I does not appear to be framed appropriately to seek relief by way of a constitutional writ against an officer of the Commonwealth,

nor does it contain a satisfactory statement indicating on what basis the proposed matter would be within the High Court's original jurisdiction.

You have stated only "The criminal law governs the Commonwealth of Australia".

While it may be open to you to seek relief by way of mandamus (as you have raised this in Part III),

you should seek this relief in Part I and identify each specific duty to be performed and the refusal to perform that duty, and not general statements."

- c. The 2 month rule.

"Your attention is also drawn to Rule 25.07.2 which provides that any

application for mandamus shall be made within two months of the date of any refusal to perform that duty."

d. Statutory provisions.

"... you will need to replicate each legislative provision you seek to rely on in Part VIII."

e. Annexure A.

"The text that you have currently annexed to the Form 12 is not required and will not be accepted for filing."

f. The defendant's address.

"You should also state the legal representative ..., on the last page of the Form 12 where it states "To The Defendant, Commonwealth of Australia)."

g. Naming of the defendant in the interlocutory application.

"You have addressed this to the "Commonwealth of Australia, High Court of Australia". I reiterate my comments above about the naming of an officer of the Commonwealth."

h. Separate affidavit.

"... Form 21 application, ... must be supported by an affidavit – see Part 13 of the *High Court Rules* 2004. That affidavit is separate to the Form 12 affidavit in support which serves a different purpose."

35. Addressing each issue respectively, the plaintiff asserts:

- a. The Commonwealth of Australia is vicariously liable for its officers. Those officers have been explicitly stated in the orders sought in Part I of the originating application. The substantive mandamus is dependent on the outcome of the interlocutory application which largely seeks declaratory relief. It is inappropriate nor legally strategic to list those Commonwealth officers as defendants at this stage in the proceedings.

"This is due to the determination of the interlocutory application being entirely independent of those officers, which has not been decided." and "... the unknown amount of Commonwealth officers that may be involved in the related unperformed obligations, ..."

If the declaratory relief is successful, then it would be appropriate to list those officers as defendants. This procedural situation was sort of seen in *Plaintiff S157/2002 v Commonwealth*³ where the plaintiff sought declaratory relief before wishing to initiate the jurisdiction of the Court under s 75(v) of the *Constitution* to issue writs of prohibition and mandamus against officers of the Commonwealth.

³ *Plaintiff S157/2002 v Commonwealth* [2003] HCA 2; 211 CLR 476; 195 ALR 24; 77 ALJR 454

"If the interlocutory proceeding is successful, then I will amend the named defendants to those officers."

In addition to r 21.04 of *High Court Rules 2004* (Cth), the alleged mis-joinder does not invalidate the originating application.

The defendant is correctly named and the application is within jurisdiction.

- b. Part I states the precise orders sought by the plaintiff seeking the regulation of all **terrorist organisation** in the Middle East as of 2025. It is the intended scope of the orders sought which may become more specific as the proceedings progress and discovery is had to the relevant evidence.

"The relief you seek in Part I does not ... contain a satisfactory statement indicating on what basis the proposed matter would be within the High Court's original jurisdiction. "

Part II is for statements of justification, not necessarily jurisdictional basis.

The plaintiff has stated more than "The criminal law governs the Commonwealth of Australia."

The relief of mandamus⁴ is implicitly and sufficiently sought in Part I.

- c. The Registrar is referring to Rule 25.02.1 of *High Court Rules 2004* (Cth) where "An application for a writ of mandamus commanding a person to hear and determine a matter must be filed within 2 months after the day of the refusal to hear." The application in question isn't of the nature of "refusal to hear". The rule may be dispensed with pursuant to r 2.02 of *High Court Rules 2004* (Cth) or rather, more accurately, r 25.02.1 is inapplicable to this case, in contrast to Ah Yick v Lehmert.
- d. The application lists specific relied on provisions by short-hand section codes. To copy the entire provision is inefficient⁵ for an initiating document and should be reserved for written submissions and court books.
- e. Annexure A has sentimental⁶ and cultural relevance to the plaintiff's case. It is a thematic authority that demonstrates finality based on the *test of time*.
- f. The defendant's address is an obvious, implied given⁷.
- g. The defendant is correctly named (see a.). Due to the application for bias, the interlocutory application is also addressed to the High Court of Australia.
- h. An affidavit can support multiple applications. It is not efficient⁸ to prepare multiple separate affidavits.

⁴ The alleged, specific unfulfilled duty is the listing of all terrorist organisations in the Middle East as of 2025 and Commonwealth officers' compliance with ss 102.7, 103.1 of *Criminal Code Act 1995* (Cth).

⁵ ss 56, 57, 58, 59 of *Civil Procedure Act 2005* (NSW)

⁶ The subject-matter is distressing and artwork can be a form of coping mechanism.

⁷ The Australian Government Solicitor, 4 National Circuit, Barton ACT 2600.

⁸ ss 56, 57, 58, 59 of *Civil Procedure Act 2005* (NSW)

36. It is submitted the documents received by the Registry on 9th July 2025 and 10th July 2025 are *substantially* complete and compliant with *High Court Rules 2004* (Cth).

ORDERS SOUGHT

37. The Registry is to file the plaintiff's documents received on 9th July 2025 and 10th July 2025.

Dated: 24 July 2025

Amendments

25 July 2025 - corrected filing dates



Anton Tutoveanu

Plaintiff

0410 737 937

anton.tutoveanu@gmail.com

This is the annexure marked with the letter ME1 referred to in the Affidavit/Statutory Declaration of Anton Tutoveanu sworn/affirmed/declared before me at Sydney NSW on the 29th day of July 2025

~~One page only~~
Page 1 of 3 pages

IN THE HIGH COURT OF AUSTRALIA
CANBERRA REGISTRY

Carolyn Louise Johnston
A Justice of the Peace in and for
the State of New South Wales
Reg. No. 120020

CJ Johnston
Justice of the Peace Registration

BETWEEN:

ANTON TUTOVEANU
Plaintiff

and

COMMONWEALTH OF AUSTRALIA
Defendant

EXHIBIT "ME 1"

This is the exhibit marked "ME 1" produced and shown to Anton Tutoveanu at the time of affirming his affidavit this 29th July 2025.

UN Maps of the Middle East and Israel

Before me

Solicitor/Justice of the Peace



