

**FEDERAL COURT OF CANADA**

BETWEEN:

**Radu Hociung**

Appellant

and

**Minister of Public Safety and Emergency Preparedness  
and  
Canada Border Services Agency  
and  
Her Majesty the Queen in Right of Canada**

Respondents

**LETTER TO THE COURT  
Re: Costs**

Radu Hociung  
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Kitchener, Ontario  
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**TO:**

Department of Justice  
Mr. Eric Peterson, Counsel for the Respondent  
120 Adelaide Street West  
Suite #400  
Toronto, Ontario  
M5H 1T1  
by fax: (416) 973-5004

**AND TO:**

The Registrar  
Federal Court of Canada  
180 Queen Street West  
Suite 200  
Toronto, Ontario  
M5V 3L6

## **Re: Court dockets A-101-18 and A-102-18, Costs**

### **Honourable Court,**

1. At the May 23, 2019 Toronto hearing of these appeals before Justices Gauthier, Webb and Rivoalen, the Appellant was directed to serve and file a letter by June 7, 2019 explaining what makes the Crown vicariously liable for the actions of the four individuals named in the Statement of claim, to make submissions pertaining costs, and to respond to the Respondent's Letter to the Court date May 29, 2019.
2. On June 7, the Appellant filed and served the letter explaining the Crown's liability, and requested an extension of time to make costs submissions.
3. The Appellant hereby respectfully submits his costs for the two appeals, and for the two motions that were appealed, from the Federal Court docket T-1450-15, including itemized summaries, enclosed.
4. Although the Appellant is self represented, he is entitled to compensation for his time in handling this matter (*Yu. v. Canada (AG)*, 2011 FCA 42 at para 37; *Sherman v. Canada (Minister of National Revenue)*, 2003 FCA 202 at para 42-52, *Air Canada v. Thibodeau* 2007 FCA 115 at para 24). This case is much larger than a simple non-reporting infraction, which is only the tip of the iceberg. The real issue is that of money laundering by a Crown corporation, which has required much research and preparation. The appellant saw this work as so important as he practically abandoned his electrical engineering career to focus on learning and prosecuting this case. Even this choice is likely orders of magnitude cheaper than if he had hired professional lawyers to do the same work. That would have been financially untenable
5. The Appellant normally works in engineering, at a rate of \$110/hour
6. Please note that the Appellant lives in Mexico, and the seized coins that are at the heart of this proceeding are currently located at the Queenston Bridge Point of Entry, in Niagara Falls, Ontario. Should your determination be that the coins must be returned, kindly provide additional costs to cover the Appellant's travel to pick up the coins. The CBSA has informed the Appellant that they do not ship seized items, and they would

have to be picked up in person.

***All of which is respectfully submitted,***

A handwritten signature in black ink, appearing to read 'R. Hociung'. The signature is fluid and cursive, with the first letter 'R' being large and prominent.

Radu Hociung - Appellant