

IN THE MATTER OF
THE BRITISH COLUMBIA SECURITIES COMMISSION
AND
ROBERT JOSEPH LEYK

NOTICE OF APPLICATION

Applicant: Robert Joseph Leyk

To: Commission Secretary of British Columbia Securities Commission
Via Email: COMMSEC@bcsc.bc.ca

And to: Executive Director of British Columbia Securities Commission (ED)
Via Email: DHainey@bcsc.bc.ca

And to: Manjit and Perminder Sihota
Via Email: Alexandra.luncenko@blakes.com

And to: Thalbinder and Sharon Poonian
Via Email: jn@narwallit.com and eg@naewallit.com

TAKE NOTICE that I am making an application to the British Columbia Securities Commission ("BCSC") at 701 West Georgia Street, Vancouver, BC on a date to be determined for the orders set out in Part 1 below.

Part 1: ORDERS SOUGHT

1. An Order for Complete and full disclosure by BCSC
2. An Order to disclose all documents, evidence and material relied upon to establish the grounds for making the Liability and the Sanction Decisions dated August 29, 2014 and March 13, 2015, respectively (the Liability and Sanction Orders) by BCSC;

3. An Order to disclose documents, evidence and material relied upon to establish the grounds for making the Commission's Investigation Order and/or amended Investigation Orders regarding this file (the Investigation and/or Amended Investigation Orders) by BCSC;
4. An Order to disclose all documents to include relevant, irrelevant, whether they were relied upon by BCSC or not. For clarification, I do not want BCSC staff to decide what is relevant for my defense.
5. An Order that after receiving the above noted documents, I will require 90 days to review and file additional evidence in support of my Service\Malicious prosecution application dated March 27, 2017, after which BCSC can respond and I will require 10 days to respond to any new items that will be raised by BCSC and followed by an oral hearing to present my case.

Part 2: GROUNDS FOR ORDER SOUGHT

6. Representatives of the Executive Director and BCSC acting within their prosecutorial or enforcement mandate engaged in malicious prosecution against Robert Joseph Leyk.

Affidavit #1 of Robert Leyk, para 13 to 18 (attached)

7. As stated by Mr Hainey in his October 20, 2017 email "With respect to Mr. Leyk's request for the evidentiary record relied upon by the panel at the time it made the decisions on liability and sanctions, access to hearing exhibits and transcripts are subject to an application to the Commission. " Here is my disclosure application.
8. Furthermore Mr Hainey stated in his October 20, 2017 email that "The Executive Director would take no position on such an application." Therefore the above Orders should be granted immediately.
9. The above noted schedule is not prejudicial in any way as the damage from BCSC orders is already done. Also BCSC took 6 and half months just to respond to my Service\Malicious prosecution application dated March 27, 2017 therefore the timeline I have outlined above is not an unreasonable request.
10. Even though BCSC is "Masters of its own Processes" but basic principles of Canadian Judicial system still apply such as procedural fairness, natural justice, complete and timely disclosure and un-biased decision makers otherwise the Proceedings are nothing more than a sham as they are unfair and constitute abuse of process, resulting in malicious prosecution.
11. I have never had the opportunity to defend myself.
12. BCSC has never done a compelled interview of Robert Joseph Leyk, they had the authority under Section 144.

13. I am not a lawyer by trade, have no formal education in the legal context, cannot afford a lawyer and am self-represented in front of an army of BCSC staff (last count was 190), therefore deference should be given to my cause.
14. Furthermore I am referring to BCSC as anyone/everyone that is paid by BCSC regardless of what their position or title is.

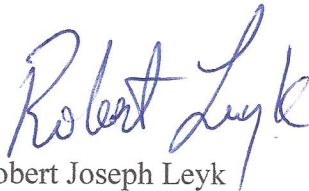
Part 3: MATERIAL TO BE RELIED ON

15. Affidavit # 1 of Robert Joseph Leyk, sworn on March 27, 2017.
16. British Columbia Court of Appeals Docket CA43449 dated June 15, 2016 between BP and RP v British Columbia Securities Commission and the Executive Director of the British Columbia Securities Commission.

The applicant awaits further instruction from BCSC on the steps to follow.

Date: October 25, 2017

Signature of



Robert Joseph Leyk
Applicant