

WILL-SAY STATEMENT OF MARIO OLIVEIRA

1. I, Mario Oliveira, a resident of the City of Toronto, formerly the City of York before amalgamation, reside at 2167 Dufferin Street, in the Province of Ontario. I am 56 years old. I have been a neighbor of the accused, Roberto Giraldi and Salvatore Giraldi and Rosina Giraldi, at 2165 Dufferin Street, for approximately 40 years. I am presently on disability and have been caring for my elderly 91-year-old father, a cancer patient, and my elderly 86-year-old mother for the last several years.

The Accused

2. Roberto Giraldi, a 50-year-old male and the son of Salvatore Giraldi, has been a persistent drug user from his early years on and for most of his adult life. Early on, Roberto Giraldi exhibited juvenile delinquency which involved voyeurism in the surrounding community's backyards as well as vandalizing Marios' and his families' vehicles and home. Roberto Giraldi has been observed using drugs, snorting unknown substances in his garage over the years, and smoking cannabis before it was ever legalized. I believe his drug use at one point contributed to his departure for about 9 months from driving TTC buses where he is employed. I also believe that his drug use has had some influence on his anti-social behaviour. His passive-aggressive conduct has persisted for nearly four decades. In the last 10 years, this conduct has involved a proxy war to include frivolous and endless complaints to the City of Toronto and to the Toronto Police.
3. Salvatore Giraldi, is 84 years old and the owner of the adjacent property at 2165 Dufferin Street. Salvatore Giraldi over the years has exhibited violent tendencies toward me, many times becoming animated, thrashing his arms in a display of aggression, picking up stones and dirt and throwing them in my direction, verbalizing and making threats, and assaulting me at other times as well as making and threatening my mother. Salvatore and his family seek to exert influence and control over my family's property, dictating when we can work on it, what we can work on, and what improvements we can make to our home.
4. Rosina Giraldi, 78-year-old and wife of Salvatore Giraldi and owner of the adjacent property at 2165 Dufferin Street.
5. Giuliana Giraldi, 61-year-old daughter resides at 91 Mulholland Avenue, Toronto, On. Guiliana Giraldi worked for the TTC for several decades where her partner and father of her son Andrew Cinerari works as well.
6. Andrew Cinerari, 32-year-old grandson and son of Guiliana Giraldi resides at 91 Mulholland Avenue, Toronto, On.

Video surveillance

7. All the video evidence provided by me are from after July 4 2022 when police were involved and charges were laid. The video evidence demonstrably shows the Giraldis breaking the peace, vandalizing and damaging my family's property, committing assault against me, bullying, intimidating, provoking me in a blatant continuation of what they had been accused of for the past 40 years in a civil case brought against them several months earlier and prior to July 4 2022. Further, in what can only be described as shocking outrageous conduct and a blatant disregard for law and

order as well indifference to the civil and criminal matters before the courts that they are a party too, the Giraldis continued to bully, assault, vandalize and harass me and my home. The Giraldis believe they are untouchable and immune to consequences for their atrocious criminal behaviour. Their videotaped acts of violence, assault, provocation and bullying are an affront to justice and an insult to the sensibility of civilized communities and people.

Allegations of Voyeurism, drug use, vandalism and Harassment

8. Shortly after my family and I moved next to the accused the Giraldi in 1985, the accused Roberto Giraldi displayed concerning behavior of voyeurism by secretly and obsessively watching unsuspecting females in their homes. To my knowledge this behavior lasted for about a decade and focused particularly on my Polish neighbor's daughter, my sisters, and another neighbor's twin daughters, leading my family to be vigilant in keeping the curtains closed for privacy. On one occasion years ago, Roberto told me he had seen our neighbour Steves daughter topless in her home, further stating that she had one breast significantly larger than the other. He went to on tell me he had also observed Peters Daughter, the polish neighbours in her kitchen topless and that she had very large breasts. In my mind this marked conclusively the beginning of Mr. Roberto Giraldi's delinquent behavior, which continued into his adulthood today.
9. One summer ago, Roberto rammed his car against the side storm door of my family's home, destroying it, and then he went inside his home without taking responsibility or providing vehicle insurance details to us. My parents had to have the door replaced under their home insurance, which refused to cover the damage. The insurance agent ended up giving a \$300 cheque to my parents so they wouldn't change brokers. Sometime later, Roberto and his sister Giuliana Giraldi walked by the driveway, laughing at the damage he had done and finding it amusing. My family did not want to interact with them and we did not pursue the matter further. My parents did not call the police, a pattern that would continue since we didn't want any trouble with anyone and surveillance cameras weren't readily available to document the Giraldi behaviour. Not reporting this to the authorities probably had some effect in encouraging further ongoing bullying in future years to come by the accused.
10. Over the next several decades steady acts of vandalism were directed at mine and my family's home and vehicles that progressed to include abuse, harassment and intimidation by the Giraldis next door, their family members and further victimization by the Giraldis proxies in what can only be described as other government insiders.
11. Early on my family and I started to suspect these criminal acts came at the hands of Roberto Giraldi. Our family continued to mind our own business and kept to ourselves threw out the years. There were also no issues with us or with any other neighbors. One by one each of the other neighbors had seemingly moved, but the vandalism persisted and we became certain the Giraldis were behind it. We also discovered back then from Steve, also a neighbour who has since moved away, that the previous owners of our home were forced to sell. Steve stated that the previous owners of our home had themselves grave issues and disagreements with the Giraldis which became so intolerable that they had no choice but to place their home for sale.
12. Salvatore Giraldi proved he was unhinged and a dangerous individual from the onset. Sometime after we had moved in his daughter Giuliana Giraldi got married and about a year later got divorced. Salvatore Giraldi became an even more angry individual. On one occasion Salvatore Giraldi asked my father to come with him to assist him in assaulting his son in-law who was playing

baseball with his team down the street at Fairbank Park that summer. My father obviously ignored his request. Not long after that Salvatore Giraldis in another conversation, told my father he was going to the Italian mafia to have his son in-law murdered. Although thinking back on it now, it was just probably the ramblings of an angry disturbed man, the fact he stated such thoughts is concerning but not out of the realm of possibility.

13. Around four or five years from when our family had moved in, our family cut all ties and communication with the Giraldis until the present day. My family probably didn't have more than half a dozen interactions with the Giraldis in 35 years since ties were cut, and of those interactions they were over some disagreement. As the years progressed there was regular flattening of my car tires with nails, puncturing the wheels or leaving nails under car tires. This occurred for several months on end and became the norm. After this period of time Roberto Giraldis conduct would switch to scratching the paint of mine and my family cars, costing thousands of dollars in repairs each time when it was repaired. These activities would alternate back and forth, sometimes with many months without any activity at all. For decades, Roberto has intentionally inflicted damage on my cars, as well as those belonging to my parents and sisters before they moved out and on their own. Interestingly once my sisters moved, they no longer had anyone vandalizing their cars. The vehicles have been marred by deep scratches and dents, reflecting a pattern of deliberate and sustained harm at the hands of Roberto Giraldis. This destructive behavior has persisted up to the present day. The mirrors on our vehicles have been completely broken on several other occasions in the past 5 years alone. All these incidents occurred at my home and were not caused anywhere else the vehicles had been driven too. In fact, there were a few instances when my sisters or her children came by for a visit and the vehicles were damaged.
14. The side window of the basement of my home is damaged from a kick that I have no doubt Roberto is responsible for. Roberto and Salvatore Giraldis regularly kick debris over to my side of the property, including repeatedly blowing dirt with a landscaping blower at other times as evidenced in surveillance videos recordings.
15. I've observed a concerning pattern of behavior from both individuals on my family's surveillance cameras. They are consistently seen kicking debris onto my property as they pass by in the shared driveway, exhibiting what can only be termed as distasteful, adolescent, and vindictive passive-aggressive behavior. This conduct appears to be a calculated attempt to provoke or irritate me. They are not isolated incidents, it's a regular action that demonstrates a blatant disregard for my space and property. Such behavior is not only immature but also reflective of a wider pattern of disrespect and a lack of consideration for the rights and boundaries of others. Dealing with this is frustrating, as it not only necessitates additional cleanup efforts on my part but also contributes to a hostile and uncomfortable living environment.
16. Roberto Giraldis at other times repeatedly kicks my lawn chairs when he is in his destructive mood illustrating his deep passive aggressive behavior of his personality. These lawn chairs are firmly on my private property and not subject to the right of easement or right of way. In the winter months Roberto Giraldis and Salvatore Giraldis blow the snow on their property over to ours, at my property and or dumping snow on our property and blocking our entrance and access to our property.
17. Over the years there has been some thefts. Two Power drills were taken from my garage at different times. Construction material has also been taken from time to time. On one occasion I noticed my propane tank that was nearly full was switched and taken the following day after I noticed Salvatore fiddling with an empty BBQ tank in his backyard, having issues starting his own BBQ. On another occasion Salvatore and another neighbor took a long ladder from my backyard without permission and went onto Salvatores roof using my ladder to make repairs.

18. The Giraldis have complained to City of Toronto and even the police about my building a shed, the planters on my property, the side door step, trees planted at the front of our home and even made complaints that I was making improvements to the inside of our home. Their complaints are endless and serve one purpose and that is to harass me and my family.
19. After parking our vehicle in the front of our home front parking spot for 40 years the Giraldis managed to get the city of Toronto to stop us from using the parking space. My father can barely walk and both my parents are handicapped. This matter is presently before the courts. Despite all these acts I have attempted to keep the peace over the years even as my family have steadfastly refused to have any dealing or interaction with the Giraldis themselves.
20. Robert Giraldi and Salvatore Giraldi have also conspired with and enlisted family members living elsewhere, to participate in their efforts to terrorize me and my family. Giuliana Giraldi, Roberto Giraldi older sister and her own son Andrew Cinerari, have partaken to harass me and my family. They have also vandalized my property, they have continually called the city of Toronto and the police consistently and zealously in their proxy war against me and my family.
21. To my best recollection in mid to late -2022, Peter Anagnostakos my neighbour asked if I could help him trim a tree. The back of our properties partially meets together. A fence and a shed however block our view of each other. After jumping over to another neighbour's property to discuss how we would proceed I jumped back onto my property to fetch one of my long ladders. As I was doing so Salvatore Giraldi from his side of the back yard began to shout and yell at me in a threatening manner while waving his arm violently about. I froze for a brief moment as I held on to my ladder and then proceeded cautiously back up to join Peter. Once I reached Peter, Peter asked me who was yelling and what was it about. I responded that it was my other neighbour Salvatore Giraldi and that he was probably angry because I was in my back yard. Salvatore anger and rage were vocalized so loud that Peter could hear him while not able to see him from his own backyard/
22. As a result of all the frivolous complaints to the City of Toronto, only two complaints out of hundreds to get any traction, the city did order that the construction debris be cleared from the back of my home, and a direct result from the Giraldis endless complaints. The Giraldis had another plan after this particular complaint was addressed by the City of Toronto and that was to sabotage my compliance with the City Order. On July 4 2022, I attempted to comply with that order and instead I was prevented by Roberto Giraldi who placed his vehicle in the mutual driveway at the back, in order to prevent the construction waste bin from entering that I had ordered from being dropped off at the back of my property. Salvatore Giraldi also came out to the front to stop the bin as well. At one point and in the next 14 seconds Salvatore moved towards me suddenly in an effort to lunge and attack me but then reversed course as I was moving away from him. Salvatore then turned to threaten the waste bin delivery driver violently thrashing his arms forward in a rage. In frustration I pushed Salvatore Giraldi out of the way. Salvatore suffered no injuries, however I was charged and I pleaded guilty to that charge. No charges were laid for mischief or threats against the accused Roberto or his father Salvatore for blocking the right of way or for threats made by them.
23. As a result, my elderly mother requested that I install surveillance cameras for our protection and to document the illegal and criminal conduct of the Giraldis. My mother dispensed a cheque to me that I deposited into my account and then ordered the cameras from Amazon. The cameras and the home belong to my parents and I reside there and provide care for them. I eventually installed the surveillance cameras sometime later. Incredibly however the surveillance cameras

did not have a deterrent effect on the Giraldis as they continue to abuse, harass, intimidate and assault me and my family.

24. When the Giraldis are away on vacation their daughter Giuliana Giraldi who lives elsewhere picks up the slack. She comes over and takes endless pictures of my home, calls the city and the police on a regular basis to complain. At one time for several weeks, she was observed trying to trigger the surveillance cameras I had installed for my mother in an effort to trigger the surveillance flood light that were malfunctioning, so she could then complain to the police and have charges laid against me. On one occasion Guiliana Giraldi came over and began taking pictures of the Light Pole I had installed in the front yard and then complained to the city. Another time Guiliana Giraldi Called the City of Toronto claiming I was doing renovations inside the home. Yet on another occasion Guiliana Giraldi came over and took photos of the repairs being made to the side door step and complained to the City of Toronto again. The Giraldis have used these proxies including family members, the city of Toronto and even the police in their detestable efforts to harass, intimidate and subjugate me and my family over the years in a nonstop unrelenting effort to harass me and my family.
25. Several years ago, Roberto Giraldi, while engaged in his drug use in his backyard, began to kick my gas meter violently. My mother naively thought someone was banging on the back deck as the loud thumping sounds could be heard from inside the house. She rushed outside to see who it was that was pounding on our home so urgently. When she opened the side door, she encountered Roberto at the back corner of our house next to the gas meter, angrily complaining about the dirt at the corner of our home. The debris had been swept into a small pile by my father for collection later on. Roberto then began to kick the debris everywhere. My mother was about 80 years old at the time and my father was about 86. Roberto then threatened my mother that he was going to call the City of Toronto and complain. My mother told Roberto at the time to do that as she was interested in complaining herself to the City of Toronto that he was a habitual cocaine user who drove a TTC bus while high, placing the passengers in danger. Roberto bravado shrunk as fast as a deflating balloon. As a result of Roberto Giraldi damaging the gas meter, the meter had to be completely replaced by the gas company, including excavating the surrounding underground area due to leaking gas. This resulted in the partial removal and replacement of the asphalt on my side of the driveway. This creates a new opening for water damage to my family's basement unless the whole of the driveway is completely replaced. This conduct was dangerous and could have been catastrophic if the leaking gas had not been detected as early soon after as it was. DATE
26. In 2019, I noticed that the air in my car tires was being removed. There were no leaks in the tires, and I had to keep pressurizing the wheels over the next couple of weeks. Eventually, this stopped happening. Shortly after on April 22, 2019, I drove my vehicle on Hwy 400 to Innisfil. The vehicle was making a terrible sound, and eventually, after an hour, I pulled over to the side and noticed that 4 of the 5 bolts holding the driver's side of the front wheel were missing, and the wheel was being held by the one bolt only. These bolts are designed not to come off. If the wheel had come off completely, I could have been killed, or others could have been critically harmed had I continued on my way driving at 100 km/h north on the 400. I immediately filed a police report. The police failed to investigate and get the video surveillance from the Giraldis home surveillance cameras.

Video and photographic evidence of intentional damage to complainant property

27. On or around the year 2017, Salvatore Giraldi, while supervising a contractor he had hired to re-asphalt his side of the garage roof, intentionally cut 24 inches or approximately two feet into my

side of the roof, permanently damaging and creating a joint, a weak point where an otherwise continuous and uniform material would have existed. The removal of the entire roof and re-asphalting is the only solution, costing over \$8000.00. With Salvatores authorization the contractor also took several wood planks not belonging to Salvatore from my property without consent, rapped them in asphalt and placing them down the middle of the roof for weight purposes.

28. Approximately around the year 2018, Salvatore Giraldi excavated the mutual shared driveway, including my side, without permission to do so. Salvatore was only allowed to occupy the mutual shared driveway for repairs and not cause any intentional damage to my side of the driveway. However, Salvatore had the asphalt ripped off from my side of the property and removed, and then had all the excavated dirt from his side placed against the brick and doors of my home. When my elderly mother returned home and saw the large amounts of dirt up against her home, she became upset and told the contractor to remove the dirt from the side of our house immediately. Salvatore Giraldi instantly engaged with my mother and threatened to place all that dirt inside our home and bury my mother under it. Some 2 months later, the mutual driveway was partially asphalted instead of the complete driveway restoring it to its previous state. Once again, an intentional joint to the side of my home was cut, creating a weak joint of old and new asphalt, instead of the whole driveway being asphalted over. A weak point for water damage in the basement of my home now exists as a result of Salvatores conduct. Approximately \$10,000.00 will be required to asphalt the entire driveway again. Subsequently the joint was not even properly closed and one side of the asphalt rose nearly 5 inches the first winter. Salvatore attempted to repair it himself but the issue continues.

Document evidence of assault from civil claim and defense

29. On or about March of 2002, I purchased treated deck wood to construct a new fence and proceeded to remove the old fence at the back of my property, which had been installed by my father decades earlier. During this process, Salvatore Giraldi stormed out of his home to verbally assault me and threatened further action if the removal of the old fence continued. In a particularly aggressive act, Salvatore Giraldi picked up a large container with a fluid and angrily threw the container liquid at me, with a large quantity of liquid from the container landing on me and, drenching me. This incident occurred amidst the COVID-19 pandemic. Subsequently, Salvatore Giraldi shamelessly contacted the police, who, however, declined to show up and intervene. In a civil claim made subsequently against the Giraldis by me, Salvatore admits to this assault, excusing his conduct as unintentional.

Video evidence of assault and vandalism-mischief and Solicitation

30. On October 2nd, 2022, my families video surveillance captured Salvatore Giraldi using a landscaping blower to direct debris from his property onto mine, treating my home as a personal dumping ground. Salvatore Giraldi subsequent instructed and directs his son, Roberto Giraldi, to retrieve his car keys. Upon Roberto's return, Salvatore commanded him to drive his vehicle parked at the back into my recycling bins, which were located on my side of the property and not within the shared driveway or subject to any easement rights. Seeking confirmation, Roberto gestured towards the bins, as if to confirm his father wanted him to ram into my property and Salvatore responded with a firm and irate nod to confirm. Subsequently, Roberto complied by driving his vehicle into my property, striking the bins knocking them over and several bags of drywall plaster onto the floor and tools nearby. In the process Roberto damaged and teared open the bags of plaster and breaking one tool of mine in the process.

31. Some 6 hours later, while I was working in my backyard, Salvatore Giraldi, dressed in Sunday attire after having changed from working clothes, emerged from his house with intent and went to his garage to grab the leaf blower. He then made his way to the top of his garage and above me and began blowing debris from the top of his garage so that it would land on me. This was done deliberately to interfere with my work on my side of the property and in an effort to stop me, provoke and frustrate me. Once again, I was left with no choice but to stop working and retreat inside my home.
32. On October 23 2022, In the footage captured on video, Salvatore is observed actively encouraging his grandson, Andrew Cinerari, to continue in the act of blowing debris from his side of the property onto mine. This action is not merely a casual or thoughtless gesture; it appears to be a deliberate attempt to use my home as a dumping ground for their unwanted materials. Salvatore's involvement in directing this activity suggests a coordinated effort to disrespect my property and space. In another video Andrew Cinerari is observed kicking my waste bin at the back of my property. In yet other videos and at different time Andrew Cinerari is observed making lewd gestures in my home's direction and at the surveillance cameras. It's particularly disconcerting to see an elder family member instigating such behavior, as it sets a negative example and perpetuates a cycle of hostility. This conduct not only creates a physical mess on my property but also signifies a deeper disregard for neighborly coexistence and basic respect.
33. On October 22, 2022, Roberto Giraldi began to blow debris directly at my property and directly at me with a landscaping blower. Roberto and his father Salvatore wanted to work in their backyard alone and wanted to prevent me from working in my backyard. They have this belief that they own the mutual driveway and that they can control when or what I can do on my family's property. At one point, after Roberto had begun to blow the debris at me, I decided to go all the way to the back of the house and away from them so I could clean up the backyard. It was then that Roberto chased me to the back and began to point his blower at me and assault me once again. I then left and went to work on the opposite side. Roberto then left and continued to blow debris from his home over to my home. About 20 minutes later, Roberto went back up to the back of the property and began pointing and blowing debris at me and my home again. Video evidence is provided with this will-say.
34. On October 23, 2022, I was working in the back cutting concrete to repair the front of my home when Roberto went into his garage and grabbed the landscaping blower and pointed it directly at me, blinding me temporarily. I turned around and left. I went back to my side to continue, and Roberto once again grabbed the blower and began to point it at me and blow debris. I stopped what I was doing and went to the back of my property to continue cleaning. After a short time, Roberto once again, as evidenced in the video, went to the garage to retrieve the blower and went to the back of his property and pointed the blower directly at me. At some point, I was clearing shrubbery and placing it on the roof of my garage when Roberto approached me from his side of the garage and began to film me to antagonize and harass me. About an hour later, I returned to work on the concrete on my side of the property, and Salvatore picked up the blower and intentionally pointed it at me, blowing debris into my eyes. Again, I was forced to stop. I then went back to cleaning the backyard at the end of my property when Roberto chased me again with the blower and pointed it at me and began blowing debris at me. I then moved to the north side of my property to get away from Roberto. Roberto then came down to the driveway where he continued to point the blower in my direction and at me. Eventually, some friends came to see me, and I just left everything.

35. On July 6, 2023 I was staining the deck in my back yard. At some point I am in my part of the mutual driveway when Roberto Giraldi went to his car to leave. I got up and moved out of the way. After Roberto reversed into the drive way, he intentionally moved forward into my lawn chairs that I have at the back of the property. These chairs are on my family's land and not subject to the right of easement or part of the mutual driveway. I had contacted the city and was informed that the easement only extends by 16 feet from the back of our house. This continual provocation by Roberto is seen in video surveillance at several other times where he kicks the chairs with his feet. I became upset and told him if he kept up with his conduct, I would prevent him from using my part of the driveway. Roberto responded by telling me it was his driveway and then shouted "fuck you". I responded and witch time Salvatore came down to threaten and challenge me. I walked away from him. At this point Salvatore turned his anger toward my 84-year-old mother and began to threaten her with his posturing and grinding of his teeth as he clenched his fists. There was also another occasion Roberto Giraldi grabbed his testicles at me after the fire department had been called because they continue to BBQ in the garage which is a fire hazard and dangerous and contrary to City of Toronto Bi-laws. On another occasion after a disagreement, he told me to go fuck my mother.
36. In July 26, 2023 while working in the back of my property, with my back turned towards Salvatore Giraldi, Salvatore angrily grabbed a shovel and slammed it on the ground in what could have been a potential attack against me. Salvatore then shouted at me, his anger stemming from his belief that he can dictate my activities and that I can't work on my home. At one point, Salvatore picked up the landscaping blower and started blowing debris from inside his garage towards me. In a fit of rage, he grabbed a large pale filled with what appeared to be sand and ashes, tossed it onto his backyard floor, then picked up the leaf blower and directed the debris straight at me. This not only blinded me but also littered my property with his waste. Once again, these assaults and harassment prevented me from working on my property. Eventually, his wife, Rosalina Giraldi took her turn, pointing the blower at me and turning it on, further interfering with my work by spreading debris everywhere and temporarily blinding me. She persisted in this behavior for several minutes, forcing me to cease my work. She then started making witchcraft gestures at the video surveillance cameras I had installed in an effort to document this regular pattern of harassment. This accumulated conduct to date is nothing short of criminal harassment under section 264 of the criminal code and also chargeable under obstructs, interrupts or interferes with the lawful 430(1)(c) CC.

Evidence of vandalism mischief

37. On December 10, 2022, Roberto Giraldi took the landscaping blower and began to blow potting dirt that was on my side of the driveway all over my front veranda and steps of my house. A few days earlier, the large pots had been knocked over, hence the reason there was dirt on my side. Roberto intentionally made a mess of the front of my home. On his way to place the blower in the garage, Roberto also began to blow debris from his side onto my property at the back, making a further mess.
38. On May 27, 2023, I experienced yet another deeply unsettling incident involving Roberto Giraldi. He took a landscaping blower and deliberately began to blow debris and dirt directly at my home, covering it in filth. Unfortunately, this is not an isolated event, it's a regular act that seems to be part of a pattern of aggressive behavior. This repeated conduct is not only aggressive but also feels like a calculated attempt to disrespect and violate my personal space. It's disheartening to witness such behavior repeatedly, as it goes beyond mere inconvenience and ventures into the realm of personal attack. This conduct achieves nothing but increased tension and animosity, making me

feel targeted and unsafe in my own home. It's a blatant disregard for neighborly respect and common decency, leaving me frustrated and anxious about what might happen next.

39. On December 10, 2023, Roberto and his father Salvatore Giraldi were video recorded engaging in an act that felt like a direct affront to me and my family. Once again, this is not an isolated event, it's a regular act that seems to be part of a pattern of aggressive behavior. They are seen blowing snow at my home, intentionally blocking my side of the property and entrance by dumping their snow onto my property or front of my property. This behavior is not just inconvenient. It's disheartening and frustrating to be subjected to such actions, which seem designed to provoke and unsettle me. This conduct accomplishes nothing but creating a hostile and uncomfortable living environment, making me feel targeted and disrespected in my own home. It's a clear disregard for neighborly boundaries and mutual respect, leaving me feeling anxious and concerned about the extent of their antagonism.

Video evidence of abuse, intimidation and criminal harassment

40. I've been at the receiving end of a distressing form of intimidation from the Giraldi family, who seem to be deliberately targeting me with their behavior and not just their criminal conduct. They frequently engage in prolonged, intense staring, often multiple times in the same day, stopping and gawking at my home which feels like a clear attempt to unsettle me. This staring isn't just passing glances; it's a fixed, unblinking gaze that feels invasive and threatening. There have been instances where they've been gawking at my home, and at times, they even have the audacity to smile, as if to mock or provoke me further. This type of conduct is deeply unsettling, as it feels like a psychological tactic designed to intimidate and exert control. The persistent nature of their staring, coupled with their smiles, creates an atmosphere of fear and unease, making it clear that this is not just innocent behavior, but a calculated effort to intimidate me. Roberto Giraldi and Giuliana Giraldi also routinely engage in taking pictures and video of me and my home with their cell phone in spite of having surveillance cameras installed at the Giraldis home. At other times they taunt me while filming with their cell phones.
41. Over two days I received 900 plus crank calls on my phone around the time a disturbed Roberto Giraldi had separated from his only girlfriend at the age of 50. My cell number was provided to the Giraldis in the Civil suit I had filed against him and his father. Eventually I just changed my number as a result of crank calls I was receiving. Since I had filed my lawsuit, I received many harassing crank calls. I went to the police and was told they don't look into such matters. Roberto Giraldi is a disturbed troubled anti-social and dangerous individual with the serious potential to do serious harm.

Surveillance

42. The Giraldis have had a surveillance system of four cameras installed around their home for about 5 years before we installed our own. Roberto Giraldi has also placed additional cameras on the outside of a backroom windows and another on the front of his garage directly pointed at my home. He had also installed a camera on his front porch also blatantly pointed at our veranda and home. There are also two cameras on his veranda one which captures the front door of our home. There are also other hidden surveillance cameras in his back garden for surveillance. These cameras constitute harassment by watching and besetting 264(2)(c) CC.

continued harassment

43. All of the accused from the Giraldi family members have continued to harass and torment me and my family. Several months ago, after continued relentless and persistent complaints to the police,

the police filed new charges against me again. These charges are baseless and in reality, describe the complainants own conduct against me and are indicative of and traits of pathological narcissistic liars. This conduct by Roberto, Salvatore, Giuliana Giraldis include gaslighting, projection, victim blaming and feigning innocence.

44. The failure of police is reprehensible. Police are video recorded by my surveillance cameras acknowledging the Giraldis criminal conduct with the Giraldis in a shocking and disgraceful attitude where the police cover up the criminal conduct and admit that reasonable people can see that it was criminal conduct. The police continued unprofessional pattern of looking the other way when it comes to the conduct of the Giraldis has placed me and my family in unnecessary danger and harm. The police conduct goes beyond intentional negligence, it violates my charter rights and inflicts Intentional Infliction of Emotional Distress on me and on the fragile health of my elderly parents. This abhorrent conduct of the police is addressed in a notice of civil claim and claim to be issued against the Toronto police services and crown and others.
45. Due to a complaint by the Giraldis that has not yet been resolved, the city has unilaterally prevented the use of the front parking area, which has been utilized for 40 years. When I temporarily park on my property to transport my elderly father to his medical appointments, I am harassed and threatened. Meanwhile, the Giraldis continue to use the mutual driveway without any hindrance.
46. Thirteen private criminal charges were filed with the court through a private prosecution complaint against the Giraldis. These charges were approved by two subsequent Justices but were ultimately stayed by the Crown, citing that pursuing them was not in the public interest.

Mario Oliveira