





### Information

Police Officer  
Police File Number

CANADA  
Province of Newfoundland and Labrador

This is the information of Sandra Cahill  
(name)  
a member of the Canada Revenue Agency, St. John's, NL  
(address)  
Investigator \_\_\_\_\_  
(occupation)  
hereinafter called the informant.

ON BEHALF OF HER MAJESTY THE QUEEN:  
The Informant says he/she has reason to believe and does believe that

Tom Woodford Limited and Tom Woodford  
(full name of accused)

1931/03/13  
(date of birth YYYY/MM/DD) (gender)

of 46 Kenmount Road, St. John's, NL  
(complete address)

A1B 3M9 Ph: 722-6490  
(postal code)

Where possible include both Definition and Penalty Sections for each count.

Count #8: on or about March 3, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$100,000.00, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending January 31, 2005, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #9: on or about March 31, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, made, participated in, assented to or acquiesced in the making of false or deceptive statements in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending February 28, 2005, by overstating Input Tax Credits claimed in the amount of \$120,006.65, thereby committing an offence as defined by paragraph 327(1)(a) of the Excise Tax Act.

Count #10: on or about April 26, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$113,944.70, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending March 31, 2005, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #11: on or about May 26, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$158,177.60, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending April 30, 2005, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #12: on or about June 22, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$167,252.60, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending May 31, 2005, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #13: on or about July 25, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$186,138.65, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending June 30, 2005, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #14: on or about September 1, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$430,158.65, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending July 31, 2005, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Les présentes la dénonciation de \_\_\_\_\_  
(nom)

de \_\_\_\_\_  
(adresse)

\_\_\_\_\_ (occupation)  
ci-après appelé le dénonciateur/la dénonciatrice.

Le dénonciateur/la dénonciatrice déclare qu'il/qu'elle a des raisons de croire et croit que

\_\_\_\_\_ (nom complet de l'accusé)

\_\_\_\_\_ (date de naissance - AAAA/MM/JJ) (genre)

de \_\_\_\_\_ (adresse complète)

\_\_\_\_\_ (poste) Tele: \_\_\_\_\_

si possible, fournir la définition ainsi que la clause pénale de chaque accusation



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CANADA  
Province de Terre-Neuve et de Labrador

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member of the Canada Revenue Agency, St. John's, NL (address)

de (address)

Investigator (occupation)

(occupation)

hereinafter called the informant.

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Tom Woodford Limited and Tom Woodford (full name of accused)

(non complet de l'accusé)

1931/03/13 (date of birth YYYY/MM/DD) (gender)

(date de naissance - AAAA/MM/JJ) (genre)

of 46 Kenmount Road, St. John's, NL (complete address)

de (adresse complète)

A1B 3M9 (postal code) Ph: 722-6490

(post) Tele:

Where possible include other definitions and actions in each count

si possible, fournir la définition ainsi que la clause pénale de chaque accusation

Count #15: on or about September 30, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, made, participated in, assented to or acquiesced in the making of false or deceptive statements in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending August 31, 2005, by overstating Input Tax Credits claimed in the amount of \$50,000.00, thereby committing an offence as defined by paragraph 327(1)(a) of the Excise Tax Act.

Count #16: on or about November 30, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, made, participated in, assented to or acquiesced in the making of false or deceptive statements in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending October 31, 2005, by overstating Input Tax Credits claimed in the amount of \$20,980.80, thereby committing an offence as defined by paragraph 327(1)(a) of the Excise Tax Act.

Count #17: on or about December 30, 2005, in the City of St. John's and elsewhere within Newfoundland and Labrador, made, participated in, assented to or acquiesced in the making of false or deceptive statements in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending November 30, 2005, by overstating Input Tax Credits claimed in the amount of \$154,655.80, thereby committing an offence as defined by paragraph 327(1)(a) of the Excise Tax Act.

Count #18: on or about January 31, 2006, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$105,948.80, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending December 31, 2005, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #19: on or about February 28, 2006, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$50,000.00, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending January 31, 2006, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #20: on or about March 31, 2006, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$129,712.85, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending February 28, 2006, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #21: on or about May 1, 2006, in the City of St. John's and elsewhere within Newfoundland and Labrador, made, participated in, assented to or acquiesced in the making of false or deceptive statements in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending March 31, 2006, by overstating Input Tax Credits claimed in the amount of \$194,600.50, thereby committing an offence as defined by paragraph 327(1)(a) of the Excise Tax Act.



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(full name of accused)

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(complete address)

A1B 3M9 Ph: 722-6490  
(postal code)

### Dénonciation

CANADA  
Province de Terre-Neuve et de Labrador

Les présentes la dénonciation de \_\_\_\_\_  
(nom)  
de \_\_\_\_\_  
(adresse)  
\_\_\_\_\_ (occupation)

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\_\_\_\_\_ (non complet de l'accusé)

\_\_\_\_\_ (date de naissance - AAAA/MM/JJ) (genre)

de \_\_\_\_\_ (adresse complète)

\_\_\_\_\_ (post) Tele: \_\_\_\_\_

Where possible include both Definition and Penalty Sections for each count

si possible, fournir la définition ainsi que la clause pénale de chaque accusation

Count #22: on or about June 2, 2006, in the City of St. John's and elsewhere within Newfoundland and Labrador, made, participated in, assented to or acquiesced in the making of false or deceptive statements in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending April 30, 2006, by overstating Input Tax Credits claimed in the amount of \$172,189.30, thereby committing an offence as defined by paragraph 327(1)(a) of the Excise Tax Act.

Count #23: on or about June 29, 2006, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$223,680.95, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending May 31, 2006, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #24: on or about July 26, 2006, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$226,473.80, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending June 30, 2006, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #25: on or about August 31, 2006, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$254,869.85, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending July 31, 2006, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #26: on or about September 28, 2006, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$157,999.10, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending August 31, 2006, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #27: on or about January 9, 2007, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$81,055.08, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending November 30, 2006, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.

Count #28: on or about January 30, 2007, in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully, in any manner, obtained a rebate or refund in the amount of \$213,245.90, to which Tom Woodford Limited was not entitled by overstating Input Tax Credits in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending December 31, 2006, thereby committing an offence as defined by paragraph 327(1)(d) of the Excise Tax Act.



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a member of the Canada Revenue Agency, St. John's, NL  
(address)  
Investigator  
(occupation)

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(adresse)  
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Tom Woodford Limited and Tom Woodford  
(full name of accused)

\_\_\_\_\_ (nom complet de l'accusé)

1931/03/13  
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\_\_\_\_\_ Tele: \_\_\_\_\_  
(post)

Where possible include both Definition and Penalty Sections for each count

si possible, fournir la définition ainsi que la clause pénale de chaque accusation

Count #29: on or about February 28, 2007, in the City of St. John's and elsewhere within Newfoundland and Labrador, made, participated in, assented to or acquiesced in the making of false or deceptive statements in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending January 31, 2007, by overstating Input Tax Credits claimed in the amount of \$142,310.40, thereby committing an offence as defined by paragraph 327(1)(a) of the Excise Tax Act.

Count #30: on or about March 30, 2007, in the City of St. John's and elsewhere within Newfoundland and Labrador, made, participated in, assented to or acquiesced in the making of false or deceptive statements in the Goods and Services/Harmonized Sales Tax Return of Tom Woodford Limited for the monthly period ending February 28, 2007, by overstating Input Tax Credits claimed in the amount of \$99,476.22, thereby committing an offence as defined by paragraph 327(1)(a) of the Excise Tax Act.

Count #31: between May 31, 2004 and March 30, 2007 in the City of St. John's and elsewhere within Newfoundland and Labrador, wilfully evaded the remittance of net taxes imposed by the Excise Tax Act, R.S. 1985, c. E-15, in the amount of \$4,480,456.85 in respect of the Goods and Services/Harmonized Sales Tax Returns of Tom Woodford Limited for the monthly filing periods ending June 30, 2004, July 31, 2004, August 31, 2004, September 30, 2004, October 31, 2004, November 30, 2004, December 31, 2004, January 31, 2005, February 28, 2005, March 31, 2005, April 30, 2005, May 31, 2005, June 30, 2005, July 31, 2005, August 31, 2005, October 31, 2005, November 30, 2005, December 31, 2005, January 31, 2006, February 28, 2006, March 31, 2006, April 30, 2006, May 31, 2006, June 30, 2006, July 31, 2006, August 31, 2006, November 30, 2006, December 31, 2006, January 31, 2007 and February 28, 2007, thereby committing an offence as defined by paragraph 327(1)(c) of the said Act.

Sworn before me at  
Assermenté devant moi à Provincial Court, Water Street, St. John's  
this 10 day of December, A.D. 2008  
ce 10 jour de December, en l'an de grace 2008

Confirmed/Confirmée  
 Summons/Assignment

"C"

**IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR  
TRIAL DIVISION**

**IN THE MATTER OF** the Estate and Effects of Thomas Patrick Woodford of the City of St. John's in the Province of Newfoundland and Labrador, Mentally Disabled Person.

**AFFIDAVIT**

I, Alan E. Goodridge, M.D., F.R.C.P.C, make oath and say as follows:

1. That I am a medical doctor with a specialty in neurology. I have been licensed to practice medicine in Newfoundland and Labrador since 1986.
2. That Thomas Patrick Woodford is a patient of mine.
3. That Thomas Patrick Woodford presently suffers from what has become a very rapidly progressive cognitive impairment. He presently suffers from a moderate to severe dementia.
4. That it is my opinion that Thomas Patrick Woodford is incapable of attending to his own personal affairs, including his financial and business affairs.

**SWORN TO** at St. John's, in the Province of Newfoundland and Labrador, this 13 day of January, 2009, before me:

Mary Dray

Alan E. Goodridge M.D., F.R.C.P.C.  
ALAN E. GOODRIDGE, M.D., F.R.C.P.C.

**MARY T. DRAY**  
A Commissioner for Oaths in and for  
the Province of Newfoundland and Labrador  
My Commission expires December 31, 2010

**IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR  
TRIAL DIVISION**

**IN THE MATTER OF** the Estate and Effects of Thomas Patrick Woodford of the City of St. John's in the Province of Newfoundland and Labrador, Mentally Disabled Person.

**PETITION FOR GUARDIANSHIP**

TO THE HONOURABLE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR, TRIAL DIVISION OR TO ONE OF THE HONOURABLE JUDGES THEREOF.

The Petition of Andrew Woodford of the City of St. John's, Province of Newfoundland and Labrador, says:

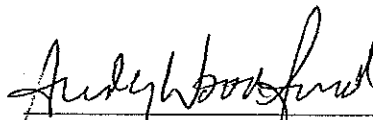
1. **THAT** the Petitioner is a resident of St. John's, in the Province of Newfoundland and Labrador and is the son of Thomas Patrick Woodford.
  
2. **THAT** Thomas Patrick Woodford is presently Seventy-Seven (77) years of age having been born in St. John's in the Province of Newfoundland and Labrador, on March 13, 1931.
  
3. **THAT** the said Thomas Patrick Woodford is presently a resident of Chancellor Park.

4. **THAT** Thomas Patrick Woodford is married to Judith Mary Woodford and there are three children of that marriage, Andrew Woodford, Tim Woodford and Kay Woodford. The Consents of Judith Mary Woodford, Tim Woodford, and Kay Woodford to having your Petitioner appointed as Guardian of Thomas Patrick Woodford's Estate are attached hereto as Schedules "A-1", A-2", and "A-3".
5. **THAT** annexed hereto and marked with the letter "B" is a true and correct Inventory and Evaluation of the Property of Thomas Patrick Woodford.
6. **THAT** your Petitioner has been told and does believe that the said Thomas Patrick Woodford is incapable of handling his own affairs and an Affidavit from Dr. Alan E. Goodridge to this effect is attached hereto and marked with the letter "C".

**YOUR PETITIONER THEREFORE** humbly says that This Honourable Court or Your Lordship may be pleased to appoint Andrew Woodford, son of Thomas Patrick Woodford, as Guardian of the Estate and Effects of the said Thomas Patrick Woodford under and by virtue of the provisions of The Mentally Disable Persons' Estates Act, 1990, R.S.N., c. M-10

**AND** Your Petitioner as in duty bound will ever pray, etc.

**DATED** at St. John's, Newfoundland and Labrador, this 12 day of January, 2009.

  
\_\_\_\_\_  
ANDREW WOODFORD

150 "B" (with a circled 'A' and a slash through it)

IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR  
TRIAL DIVISION


**IN THE MATTER OF** the Estate and Effects of Thomas Patrick Woodford of the City  
of St. John's in the Province of Newfoundland and Labrador, Mentally Disabled Person.

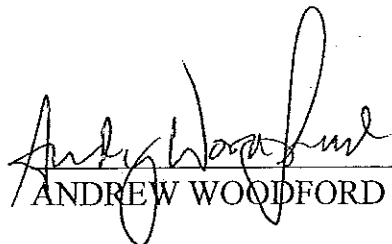
**Inventory and Valuation of the Property of the said Estate**

<u>GENERAL DESCRIPTION OF PROPERTY</u>	<u>VALUE or AMOUNT</u>
Land, Buildings and any interest in Land.....	\$ 750,000.00
Household Goods and Furniture.....	\$ 100,000.00
Motor Vehicles.....	
Stock in Trade and any interest in Business.....	
Book Debts and Promissory Notes.....	
Money Secured By Mortgage.....	
Moneys due under Life Insurance.....	
Bonds, Stocks and Shares in Companies.....	
Securities for Money.....	
Cash on Hand.....	
Cash in Bank.....	\$ 25,000.00
Other Property not before mentioned (if any).....	
.....	
..... <b>TOTAL</b> .....	<b>\$ 875,000.00</b>

I, **Andrew Woodford**, make oath and say that I am **the Petitioner** and that the above is, to the best of my knowledge, information and belief, a just and true Inventory and valuation of all property in the estate of Thomas Patrick Woodford, as far as I can at present ascertain.

SWORN at **St. John's, NL**  
on the **12** day of January,  
2009, before me

  
\_\_\_\_\_

  
\_\_\_\_\_  
ANDREW WOODFORD