FORM 80A - Rule 80

AFFIDAVIT

Court File No. T-577-20

FEDERAL COURT

BETWEEN:

CANADIAN COALITION FOR FIREARM RIGHTS, RODNEY GILTACA, LAURENCE KNOWLES, RYAN STEACY, MACCABEE DEFENSE INC., WOLVERINE SUPPLIES LTD., AND MAGNUM MACHINE LTD.

Applicants

and

ATTORNEY GENERAL OF CANADA and CANADA (ROYAL CANADIAN MOUNTED POLICE)

Respondents

APPLICATION UNDER sections 18 and 18.1 of the Federal Courts Act, RSC 1985, c F-7.

AFFIDAVIT

- I, Wyatt Singer, owner and co-founder of Maccabee Defense Inc., of the Town of Okotoks in the Province of Alberta, SWEAR THAT:
- 1. I am an owner and co-founder of Maccabee Defense Inc. ("Maccabee"). I have personal knowledge of the facts sworn to in this Affidavit, except where I have stated facts based on information, in which case I believe the information to be true. Maccabee is an Applicant to the Application in Court File No T-577-20 (the "Application").
- 2. Maccabee is an Alberta based manufacturer and retailer of a single firearm, the SLR-Multi Rifle ("SLR-Multi"). Maccabee was founded by my wife, Shaina Singer, and me in 2015.
- 3. The Application is a judicial review application and Charter challenge of the Regulations Amending the Regulations Prescribing Certain Firearms and Other Weapons, Components and Parts of Weapons, Accessories, Cartridge Magazines, Ammunition and Projectiles as Prohibited, Restricted or Non-Restricted, SOR/2020-96 (the "Regulation") and the Order

Declaring an Amnesty Period (2020), SOR/2020-97 (the "Amnesty Order"). The Application is also a judicial review application of certain ad hoc things done by the Royal Canadian Mounted Police ("RCMP"), including through the Specialized Firearms Supports Services Unit ("RCMP SFSS") and the Firearms Reference Table ("FRT"), as described in the Application. I adopt the defined terms in that Application for the purposes of this my Affidavit.

Wyatt Singer - Personal Life

- 4. I have been using firearms since I was 6 years old. I was raised on a farm outside of Calgary, Alberta, the same farm that I currently reside at. The use of firearms is routine and necessary on the farm, especially for the control of varmints, such as gophers. Using firearms was the safest, most environmentally sound, and effective way to control varmints. Using firearms has been a daily part of my entire life. I was taught at a young age that firearms are a tool that we use to carry out our farming duties.
- 5. In addition to using firearms during our everyday life on the farm, when I was 12, I became involved in recreational sport shooting. As I grew older I continued with sport shooting, and I continue to do so now.
- 6. When I turned 18, I passed the Canadian Firearms Safety Course and I obtained a Possession and Acquisition License ("PAL"). A few year later I took the Canadian Restricted Firearms Safety Course test and I obtained a Restricted Possession and Acquisition License ("RPAL").
- 7. After I graduated high school, I began working for my family-owned oil and gas transportation business. In that job I was often in remote and secluded areas, where various wildlife were present including moose, deer, and bears. I would carry a firearm with me when I was in those secluded areas as protection against wildlife. Firearms played an important role in ensuring my safety as I completed my work-related tasks.
- 8. I worked in that position for a number of years; however, that job required me to be away from home for extended periods of time. There was also a lack of consistent financial stability. With a young family, the uncertainty associated with the job became untenable.

Shaina and I decided that we would start a business manufacturing and designing firearms. It was an industry that both of us were passionate about and heavily involved in. We knew there was a need in the industry for a firearm like the SLR-Multi and we knew it would be a good business opportunity for us.

Maccabee History

- 9. In 2015, my wife and I started Maccabee. Through Maccabee I was able to combine my passion for firearms and sport shooting with my livelihood. Because we were just starting out in this field, and had no prior experience, at the beginning we kept our day jobs and worked on this project during the evenings and on weekends.
- 10. It was not easy for Shaina and me to start our own firearms manufacturing company. In order to design and manufacture a firearm, significant capital contributions are required. At the outset we invested approximately \$40,000 into Maccabee to develop a design.
- 11. At first, we hired a machinist to assist us in designing and physically constructing our ideal firearm; however, we were not getting the deliverables we needed and realized that in order to create the very specific design we were envisioning, we would have to do it ourselves. To bring the entire design and manufacturing process internal, we had to purchase all of the machining equipment and related accessories including a computer numeric control milling machine. We also had to redesign our garage to be a manufacturing and machine shop and I had to learn how to properly work the equipment. In order to obtain the tools and equipment we needed, and learn how to use them, we invested an additional \$100,000 to \$120,000 USD into Maccabee. Reinvesting our profits to grow as much as possible.
- 12. Before we took our ideas to design and manufacture a prototype, we needed to apply for a firearms business licence from the RCMP. This process involved an application and an onsite inspection. In addition to building the shop, we had to implement security features including an alarm system, gates and other security measures. We applied for and obtained a firearms business license from the RCMP in 2015.

The SLR-Multi Rifle

- 13. Shaina and I had one goal -- to create a firearm that was focused around safety and use in Canada. We wanted to design a firearm that was durable, appropriate for use in Canadian climates, would be easy to use, and embodied significant safety features with the intended purpose of being a firearm that could be used by beginners who are first learning to hunt or sport shoot. Given that our target customers were individuals who were new to firearms, and specifically women, with little to no prior firearm experience, we wanted to design a firearm that would be designated as non-restricted to allow access to our target customer.
- 14. Generally speaking, first time owners of a firearm will only hold a PAL and therefore can only possess a non-restricted firearm. As such, it was critical to our business model that the SLR-Multi be designed, function and receive approval as a non-restricted firearm.
- 15. Designing a firearm is difficult; and designing one that is primarily centered around safety and ease of use was an even more time intensive and costly process. In order to ensure that the firearm we were designing would be designated as non-restricted and would have the safety features we wanted, we were required to fully immerse ourselves in the regulatory requirements and firearms classification regime set out in the *Criminal Code*, and related regulations and the guidance provided by the RCMP SFSS, which through my own research I learned was the entity responsible for maintaining the FRT.
- 16. To ensure that we were able to achieve our goals, we spent a significant amount of time researching the regulatory requirements.
- 17. The SLR-Multi is unique in its design. While some firearms on the market are specifically designed in a way that builds off of or uses pre-existing firearms' operational features as a base, the SLR-Multi was uniquely designed from scratch. Its design and functionality cannot be traced back to nor does it have lineage directly or uniquely to any pre-existing prohibited or restricted firearm. That was intentional. That choice increased both the time and cost associated with the design and prototype construction.
- 18. From a functional perspective, the SLR-Multi has a multi-caliber platform. Accordingly, it can be used as a small caliber low recoil rifle (suitable for beginners and for small game

hunting or varmint control) or as a larger caliber rifle (suitable for hunting larger game such as deer). The modular design makes it ideal for both hunting and sport, while staying cost effective.

- 19. The SLR-Multi is also very durable. This was a specific design feature for hunters in Canada. Often when hunters are in the bush, they have limited supplies. If they find themselves in trouble (injured, pinned under an animal or fallen debris), the SLR-Multi is so durable that it can act as a support or as a prybar. Its sturdy construction also allows it to function in Canadian climates which can be very cold.
- 20. From a safety perspective, we also designed the SLR-Multi to look and operate differently from other semi-automatic firearms.
- 21. The serial numbers on the SLR-Multi are not simply lasered on to the firearm. On the SLR-Multi, the serial number is engraved in such a way that it would be very difficult for anyone to file down the serial number. This makes the SLR-Multi particularly undesirable and unsuitable for illegal and criminal purposes.
- 22. The SLR-Multi is also designed in a way that makes it very different from any restricted firearms and almost impossible to convert into a fully automatic firearm. Some other semi-automatic firearms feature a SP-1 trigger pocket. This is a RCMP sanctioned and accepted trigger function for semi-automatic firearms. The SP-1 trigger pocket places metal material in the trigger mechanism which makes it difficult for a semi-automatic weapon to be converted into a fully automatic firearm, which are illegal in Canada. The SLR-Multi design goes beyond that. It has separate trigger housing that makes it dimensionally almost impossible to put full-automatic components into the trigger pocket. The intent in designing the SLR-Multi in this way was to increase the safety of the firearm, even beyond the industry and regulatory accepted practice.
- 23. The SLR-Multi safety features also make it very difficult to conceal. Unlike some other firearms, the bolt system on the SLR-Multi which holds the upper and lower receiver is not just a pin; it uses a bolt which requires a specific tool to disconnect. This feature makes the SLR-Multi very difficult to dismantle for concealment purposes.

24. All of the safety, security, durability and functionality features of the SLR-Multi make it suitable for hunting and sport uses and not other purposes. We intentionally designed the SLR-Multi to highlight and feature these characteristics.

The Firearms Regulatory Approval Process

- 25. In order to receive approval and designation to manufacture a firearm, we were required to submit a technical specification package, blueprints, and actual working physical copies of the SLR-Multi.
- 26. To design and build the SLR-Multi, I used CAD design software. I was entirely unfamiliar with this software, but I learned how to use it and was able to translate all of my thoughts and ideas into actual designs and specifications. Once I completed the initial blueprints, I had a flimsy plastic three-dimensional model printed, which would allow me to visualize the components. Using that plastic model, I went back to the blueprints and made additional refinements and adjustments. Once the design was perfect, we constructed six working models. This entire process took years.
- 27. In or about January 2017, we submitted the technical data package, along with blueprints and the working models to the RCMP SFSS. Attached at **Exhibit "A"** to my Affidavit is a copy of the technical data package that I submitted.
- 28. After submitting the entire package of materials to the RCMP SFSS we waited and heard nothing for a number of months. We routinely followed up with them and in August 2017 we spoke with an Inspector at the SFSS who congratulated us and told us that the SLR-Multi required no modifications and had been approved as a non-restricted firearm.
- 29. We received the official approval on November 3, 2017 from the RCMP that the SLR-Multi had been approved and was designated as a non-restricted firearm. Attached at **Exhibit "B"** to my Affidavit is a copy of the Inspection of Maccabee Defence SLR-Multi Report.
- 30. The SLR-Multi was added to the FRT at FRT# 181822. Attached at **Exhibit "C"** to my Affidavit is a copy of the FRT #181822 for the FRT as of November 3, 2017.

Maccabee Sales and Business Presence

- 31. The public reaction to the unveiling of the SLR-Multi was significant. The hunting and sporting community really seemed to appreciate that there was a Canadian made rifle on the market that contained so many safety features, was durable, and was easy to use for all ages and skill levels. The public demand for the SLR-Multi was immediate and substantial.
- We did no advertising and simply through word of mouth in our first year of sales in 2018 we had approximately \$\$361,617.74 in gross revenue. As the demand for the SLR-Multi continually increased, we re-invested all of the profits that we had back into Maccabee to allow for increased production.
- 33. Maccabee sells the SLR-Multi through certified dealers and directly to a small number of specific customers. With respect to the certified dealers, we have approximately 4 or 5 dealers across Canada. We only sell to dealers in Canada. Our certified dealers are either stand alone hunting and sporting retailers or shooting centre with a retail division.
- 34. We also sell directly to individuals who are service members, police or RCMP officers, firefighters, first responders or veterans. We have chosen to sell directly to those individuals so that we can offer them a discount on the SLR-Multi. People who have served Canada and Canadians in that capacity are important to me and my family.
- 35. Both our certified dealers and our individual clients use the SLR-Multi for hunting and sporting. Our certified dealers are all hunting and sporting retailers. With respect to our individual clients, I know this based on our discussions of how they intend to use the SLR-Multi. These types of customers are consistent with the manner in which the SLR-Multi was designed and functions.
- 36. Shaina and I operate Maccabee out of our farmhouse garage. Since Maccabee's inception in 2015, we remain the only two employees and carry out all aspects of the business including sourcing and acquiring raw materials, manufacturing, and sales.
- 37. In 2019, sales of the SLR-Multi were gross \$515,468.59. From January 2020 to May 17, 2020 the sales of the SLR-Multi were gross \$379,641.19.

- 38. The demand for the SLR-Multi has continued to increase since its introduction to the market in 2018. We do no advertising at all, and we are not able to keep up with the orders that we receive. We would be able to sell 400 units a month just to current customers, but do not have the capabilities to manufacture at that volume.
- 39. Accordingly, in about April 2020 we started working with another Canadian manufacturer who had access to the same type of metal that the SLR-Multi uses and can obtain it at lower prices. This manufacturer also had a much larger facility for manufacturing. We were planning on shifting some of our production to this other facility to increase our product output. We were poised to significantly decrease our overhead and manufacturing costs and increase production. The result would be increased sales and revenue from the sale of the SLR-Multi; however, as discussed below, we have been unable to execute this plan.
- 40. Maccabee only manufactures and sells one product, the SLR-Multi. Our entire business and livelihood are invested into and connected with the SLR-Multi. Maccabee does not sell any other firearms or firearm-related devices.

The Impact of the Regulation on Maccabee

- 41. On May 1, 2020, I started getting numerous telephone calls, emails and text messages from our customers and certified dealers letting us know that the Government of Canada had made an Order in Council to pass the Regulation which prescribed a number of previously non-restricted firearms as prohibited. I understood based on reading the news and reviewing the Order in Council that this prescription was made on the basis that the newly prohibited items were "assault-style" or "military design" firearms.
- 42. I was told by the individuals who were contacting me that the SLR-Multi was not on the list. Further, because the SLR-Multi was designed and functions in a way that is not similar to "assault-style" or "military design" firearms, I was confident that it was not listed in the Order in Council. I checked the firearms listed on the Order in Council and confirmed that the SLR-Multi was not listed.
- 43. I did notice that the Order in Council included "variants" of the firearms listed. Because the SLR-Multi was designed in a manner in which it could not trace its lineage back to any

pre-existing restricted or prohibited firearm, I was further satisfied that it could not be designated or fall into a category as a variant of any of the firearms listed on the Order in Council.

44. On May 15, 2020 we logged into the FRT database, for which we had manufacturer login credentials, and looked up the SLR-Multi. At that time, it remained desginated as a non-restricted firearm. Accordingly, we continued to purchase raw materials and manufactured and sold the SLR-Multi. We also continued to implement our plans to expand our production at lower cost and overhead in order to increase revenues.

The Impact of the RCMP "Variant" Re-Designation of the SLR-Multi

- 45. On May 17, 2020 we started receiving phone calls, text and email messages from our dealers advising us that the SLR-Multi had been re-designated as prohibited on the FRT. We immediately logged into the FRT and saw that the SLR-Multi had in fact been re-designated from non-restricted to prohibited. Attached to my Affidavit at **Exhibit "D"** is a copy of the FRT for the SLR-Multi as of June 7, 2020.
- 46. Once we realized that the SLR-Multi had apparently been labeled as prohibited by the RCMP SFSS, we immediately stopped all sales and no further purchase orders were accepted. We shut down the machinery in our shop and ceased all production.
- As a result of the SLR-Multi being apparently labelled by the RCMP SFSS as a prohibited firearm, Maccabee can no longer sell or manufacture its only product. As a result of the Amnesty Order that was issued alongside of the Order in Council, I understand that we can continue to possess the inventory we currently have but only for the limited purposes of deactivating, destroying, or disposing of it. We cannot sell the inventory. Because we are a manufacturer and not just a retailer, we have no ability to "return" the inventory we currently have. Moreover, since Maccabee does not export the SLR-Multi out of Canada, we cannot export our inventory for sale.
- 48. Effectively, I understand that, under the Regulation we can do nothing with our inventory, but eventually submit it to the RCMP.

49. To date, we have not received any notification from the RCMP or anyone at the Government of Canada that the SLR-Multi has been apparently re-designated as a prohibited firearm. Had we not been notified by others and logged into the FRT on May 17, 2020 we would not have known that the SLR-Multi had been re-designated as a prohibited firearm. Further, we have not been advised nor are we aware of the basis on which the SLR-Multi has been re-designated in the FRT; why the RCMP SFSS deemed it to be a variant or modified version of a listed prohibited firearm, or whether the RCMP SFSS found that the SLR-Multi was not reasonable for use in Canada for hunting or sporting purposes (and if so, why not).

Impact on Maccabee

- 50. As a result of the Regulation and the RCMP FRT re-designation, Maccabee will suffer irreparable economic harm. The only product that we have designed, developed, received approval for, manufactured, and sold is the SLR-Multi. Maccabee sells no other products.
- As a result of no longer being able to sell our only product, our entire sales and market share has been eliminated. Maccabee has no other source of revenue. Maccabee will lose 100% of its business as a result of the Regulation and the RCMP re-designation. My wife and I have no other source of income. The financial impact is devastating to us.
- 52. In addition, Maccabee has invested in inventory which now has no value and cannot be sold or used. We also purchased raw metal for manufacturing which we can no longer use. The machinery we use for manufacturing becomes damaged if it sits idle, so we have started dismantling it for intended sale.
- 53. As we can no longer sell the SLR-Multi, since May 17, 2020 to the present we have suffered approximately \$325,000 in financial losses. In 2019 we had gross revenue of \$551,468.59. Given the changes we were implementing, we anticipated increased gross revenue for 2020 beyond the revenue accrued for 2019. That revenue is entirely lost.
- 54. The impact of the Regulation and re-designation of the SLR-Multi as a prohibited firearm is not only financial. Because Maccabee's only product and goodwill is attached to the SLR-Multi, the company no longer has any remaining or viable business interest.

Maccabee's ownership of the SLR-Multi design is also worthless as it can no longer be sold or used. Since we no longer have any product to sell, our market share in the firearm manufacturing and retail business has been entirely lost. Our business presence and reputation have been fundamentally damaged. Maccabee's entire business has been destroyed and we are effectively out of business.

- The personal and direct impact to me, my wife, and our 3-year-old son is devastating. The revenue from the sales of the SLR-Multi was our household's only source of income. We currently have no source of income.
- My wife and I will both likely need to find new employment. This will be challenging as we have devoted the last 5 years of our lives to establishing Maccabee. My prior work experience was in the oil and gas industry. Given the current economic hardships that the entire world is experiencing as a result of the COVID-19 pandemic, and the economic hardships facing the oil and gas industry in Alberta in particular, my prospects for finding employment are bleak.
- Furthermore, the uncertain future for Maccabee is made worse by the RCMP's apparent practice of re-designating firearms in the FRT. Even if Maccabee could embark on developing a new firearm that fills the space that the SLR-Multi occupied, which we simply do not have the financial resources to do, given the RCMP's lack of rationale and lack of transparency as to how and why firearms are re-designated from non-restricted to prohibited, it is not commercially viable for Maccabee to design a similar type of firearm that will replace the market space that the SLR-Multi occupied. Based on our experience with the SLR-Multi, I believe there is a real and significant risk that any new firearm we could design and get approved may later become prohibited without prior notice or justification.
- 58. However, because of our dire financial circumstances, my wife and I are currently in the process of designing a non-restricted bolt action rifle that we are already licensed to produce without a further inspection. While this will not replace or occupy the same position as the SLR-Multi in the market, it is necessary for us from a financial perspective. However, that is still in the design stages and is not ready for market.

Impacts to Others

- 59. As an authorized manufacturer of firearms in Canada, Maccabee has specialized access to the FRT, which is not available to ordinary firearms owners. My access connects to a live and relatively up to date version of the FRT. I understand that the public can only access a PDF version which is updated less often and is very difficult to navigate due to its size. The only way that I was able to confirm that the SLR-Multi was re-designated as a prohibited firearm was because I logged into the FRT to check. I received no notice of the change from either the Government of Canada or the RCMP.
- 60. The majority of SLR-Multi firearms that are possessed in Canada are owned by individuals of the general public. These individuals do not have live access to the FRT, but instead rely on the PDF version of the FRT. There is no way for those individuals to know that they must immediately stop using the SLR-Multi or they will be in contravention of the Criminal Code and exposed to immediate criminal penalties and sanctions.
- 61. As I understand it, the result of the Regulation and the re-designation by the RCMP is that law-abiding firearm owners and front line law enforcement officers may now be breaking the law, and they would have no way of knowing it.

SWORN BEFORE ME at the City of Calgary, in the Province of Alberta, this day of August, 2020.

A Commissioner for Oaths in and for the

Barrister + Solicitor No expiry.

Province of Alberta

This is **Exhibit "A"** referred to in the Affidavit of Wyatt Singer, sworn before me this 21 day of Cugust, 2020.

A Commissioner for Oaths in and for the

Province of Alberta

Maccabee Defense Inc. BFL# 12940310

232180 RR283 RockyView Alberta

T1X-0K7 403-816-1640

TECHNICAL DATA PACKAGE - UPDATED

Manufacturer: Maccabee Defense Inc. (MDI)

Verifier: Wyatt Singer ABBU-4606

Model: Self Loading Rifle - Multicaliber SLR-MULTI

Type: Semi-Automatic Rifle

Proposed FRT Classification: Non-Restricted

Markings & Location: Left side lower receiver: Made in Canada, Maccabee Defense Inc , Model , Multi

Caliber and Serial.

Right side lower receiver: Blank.

Left side upper receiver: Blank

Right side upper receiver: Made in Canada, Maccabee Defense Inc.

Caliber: Multi-Calibre 5.56 Nato and .223 Remington with others intended shortly.

Purpose of rifle: Target/Sport Shooting are the primary function while in the future with appropriate calibers it could be a very safe and accurate hunting/varmint rifle. Intended for Civilian market solely. Ambidextrous designed for female and entry level shooters to easily and safely learn proper operation with easy to use comfortable controls.

Barrel: Minimum overall length 18.625" or 473.075mm before muzzle device.

Trigger System: Proprietary trigger housing eliminating ability to use military M16 components. Uses trigger box to make housing of conventional trigger impractical. Trigger box designed to hold safety lever to make dimensional issues for prohibited trigger parts to function properly. Trigger box held in by screw.

Safety System: Works directly on the trigger through the trigger box to stop the trigger from movement when engaged. Safety is designed to be very accessible and ambidextrous for ensured safe operation and teaching. When installed it passes through proprietary trigger box it causes dimensional issues when using military components.

Gas System: Direct Impingement, with clamp on adjustable gas block rifle is set up to function as a single shot, not ejecting the brass to allow for safe operation while training or target shooting. The gas block

has a forward bleed off to allow for this function. An adjustable valve allows for precise gas metering to give the user different settings as required. This is especially helpful when using different factory ammunitions or when using other ammunitions. Also may use piston systems.

Stock: Adjustable buttstock. Mounted to multi position buffer tube.

Fore end: Attaches to industry standard barrel nuts. Accommodates many different styles.

Magazine: Standard 5 round steel. Caliber specific follower.

A detailed analysis of the SLR-MULTI from the design teams perspective:

This rifle was developed for the average citizen to use as a reliable and easy to operate as a self-loading target rifle for sport shooting in Canada. The design was based off the need for an easy to use single shot, self-loading rifle for two reasons. The first: learning curve for safe and proficient operation and the cost and availability of components in the Canadian market. We at Maccabee Defense Inc (MDI) wanted to produce a safe rifle that is designed specifically not to physically allow "military" rifle components, specifically the trigger, selector, and lack of disconnector. The design also has been shaped to not resemble current rifle designs and to have very distinct "No Pin" fastening of the upper receiver and lower receiver as well as the trigger to lower. We have accounted for the proposed implementation of the firearm marking legislation and have exceeded those parameters. These differences are the defining features to this rifle and are the reason why it doesn't bear a similar resemblance to others commercially available today.

Our Rifle design has been dimensionally increased in width to make this rifle harder to conceal as well as stronger for ridgitiy. It also make its pieces proprietary as upper receivers and lower receivers of similar designs don't mate properly. The calibers offered for now will be .204 Ruger though we are working on expanding to others for larger game hunting and sport target shooting once the market demands it. The minimum barrel length offered will be 18.625" or 473.075 mm long and cnc engraved accordingly. They will all have anti recoil muzzle devices on them. We will also be employing an adjustable gas block to allow for safe and quick changeover from single shot mode to self-loading. It is also to allow for in the field safe tuning for other ammunitions. We have made the lower receivers mating system incapable of connecting to current and future restricted rifle upper receivers. We have also made the lower receiver larger with a proprietary trigger box to further the inability to modify it. The trigger box is held in place by the rifles safety system as a back-up means of preventing prohibited parts from being installed and functioning.

Ease of operation has been achieved by using the same dimensions on our design as to allow common readily available rifle accessories to fit well on our upper receiver and lower receiver. We have added strength and simplicity by changing the mating system to a "T" slot system with a single detent fastener locking the upper receiver and lower receiver together. This allows for the rifle to not fit other restricted upper receivers and it makes the rifle much easier to disassemble and clean. By simply taking a ball point pen of another safe object of that shape the handler of the firearm once safe to do so can

detach the upper receiver from lower receiver in seconds without losing a pin or the help of a single tool.

The width of the lower receiver and the in-ability to mate a restricted upper receiver onto the lower receiver via our "T" slot makes our proprietary designed upper the only one that can successfully discharge ammunition. The rifle also uses a trigger box that has multiple tight radiuses specifically intended to make duplication infeasible, it allows us the ability to solely install customer desired triggers, and to allow for easy identification of tampering after departure from the factory. This is made possible by the boxes' width being the width of an AR rifle respectively, therefore normal pins wouldn't fit. The trigger box also has been engineered for semi-auto safety's, meaning a military M16 version doesn't fit, physically interrupting its installation. The exterior shape and style of the lower receiver has been crafted to incorporate its own design cues and be a functional target sporting rifle, having no pins or holes for pins makes for a clean fresh look that also keeps out the Canadian elements. It is also held in by a screw to eliminate movement or unsafe safety engagement.

We have contracted an accredited certified Master firearms maker to design the trigger/safety. He has also been signed on to verify final operation and function testing. We have adopted the proposed Firearm Marking Law that we feel is a great idea. We already comply with the height, depth and placement of said markings. We also have a documentation system in place to correctly catalog every component in each built rifle so each serial number has a very detailed file and photo before it leaves the final inspection bay. Our goal at Maccabee Defense is to not only make a profit selling these rifles but to truly enrich Canada by providing a safe rifle for Civilian use, and also by operating on a preventative safety level.

Attached to the original email we have included complete blueprints of the rifle we intend to submit for classification. There are individual drawings of the upper receiver and the lower receiver as well as the trigger box. Please note they contain all of our dimensions and hard work, we trust your team with the highest respect and thank you for your care and help with our young company. We are available anytime you wish to reach us and appreciate your time, we know how busy your team is and how much work your department does.

Thank you!

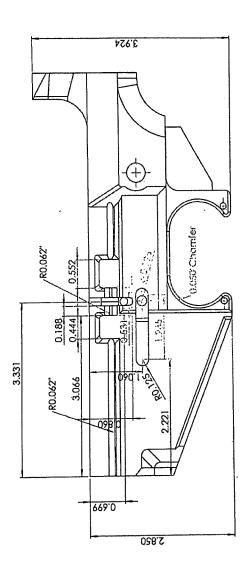
INSTRUCTIONS TO DISASSEMBLE

Before handling be sure the rifle is unloaded with the magazine out and the bolt forward. Make sure the safety is off and the hammer is decocked. This rifle is mated by a single hidden captive socket cap screw that is located on the bottom of the receiver to the front of the magwell. Use the supplied allen wrench to loosen and tighten this mounting bolt. Once the bolt is loosened and free the upper can be slid forward, be sure to have the dust cover up and latched. Slide forward till you expose roughly one inch of the inside t slot to make the upper able to be lifted vertically from there assembly. From there you remove the single screw retaining the trigger box which also lifts vertically to allow trigger cleaning. The rest of the rifle is disassembled and reassembled as a regular ar-15.

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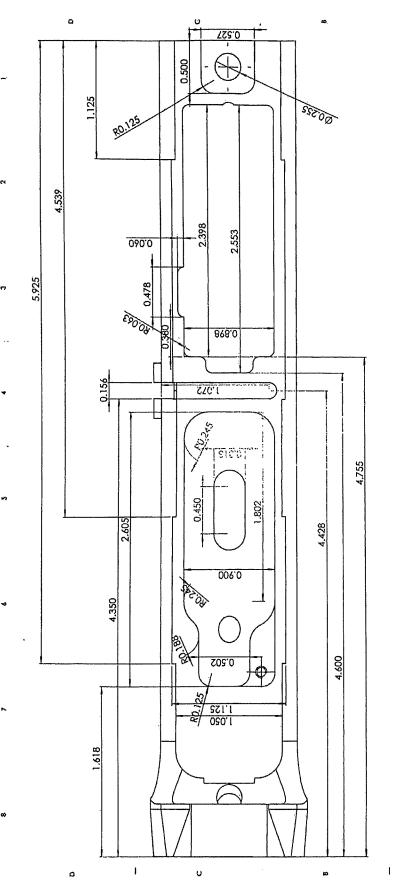
A RMS Max or As Indicated CHAPACONS WINGHES, METRO SYCHMA AS JEENATE GENERAL TOLERANCES FRACTIONAL 21/15 ANGULAR, MACH 2:5° 18ND 21.0° TWO PLACE DECIMAL 20110 THEE PLACE DECIMAL 20135 MACHINE SPECIFIC SIMILESS OF CESS OF C 7075 1651 WWW MACCABEEDEFENSE COM PH. 403 818 1640

DRAWING REFERENCES: CLIENT:
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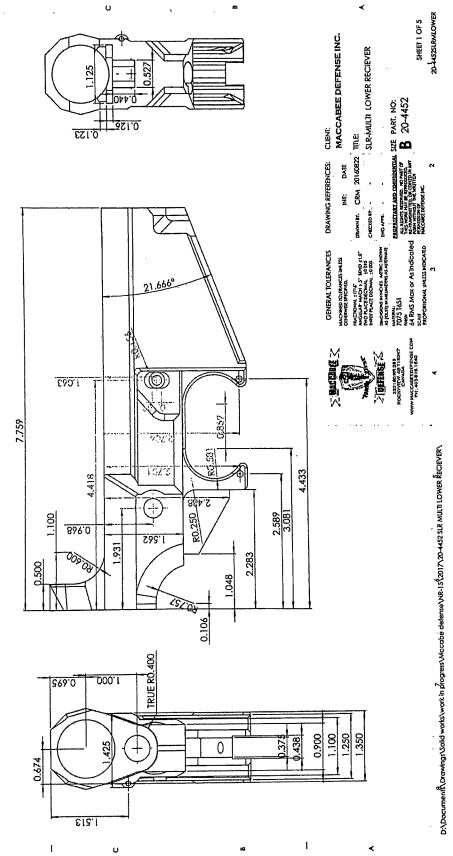
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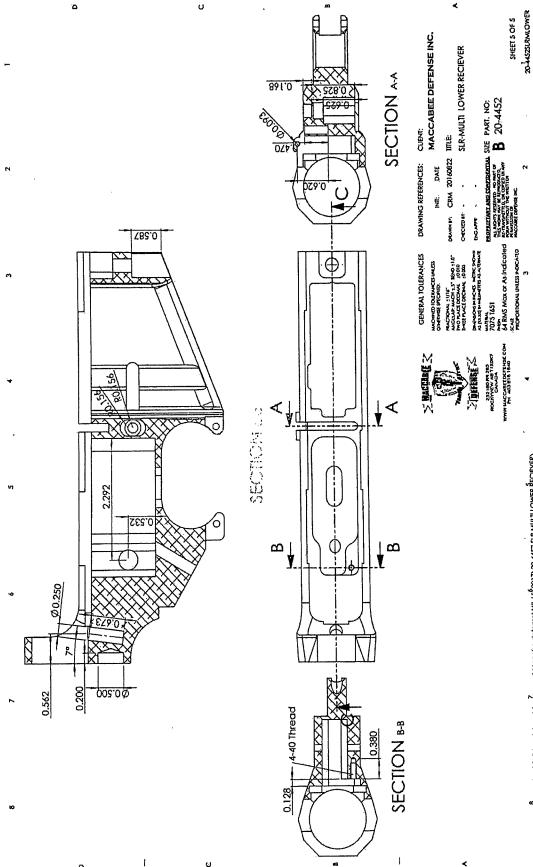
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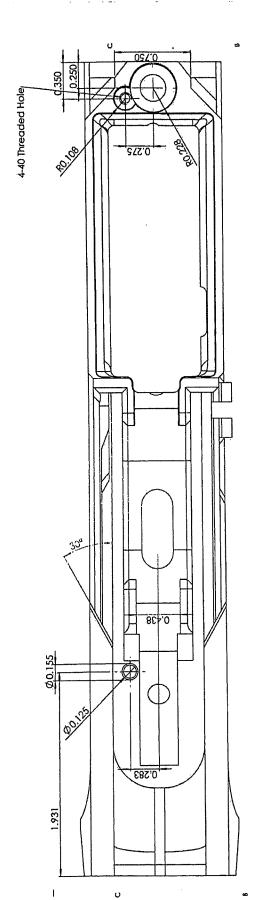
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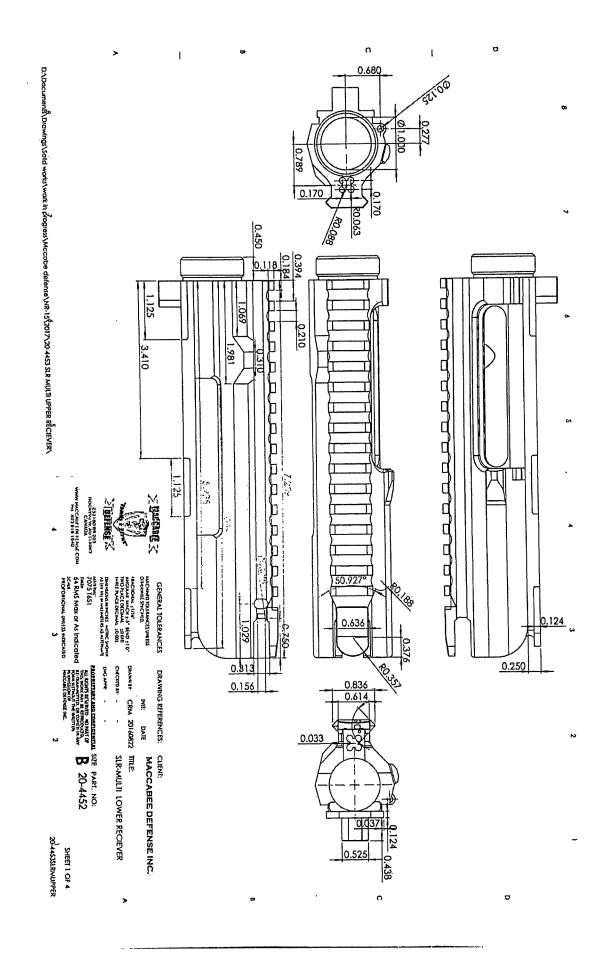
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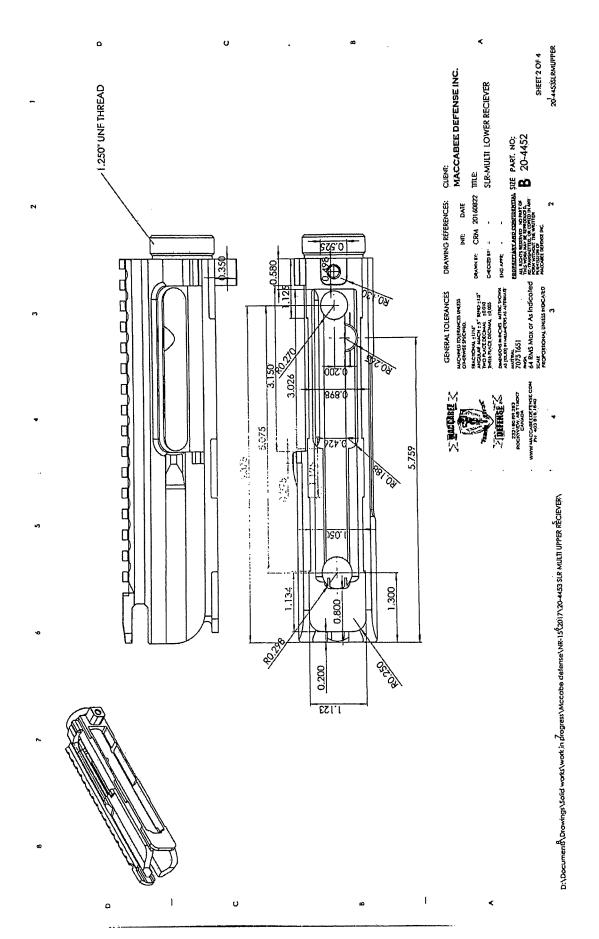
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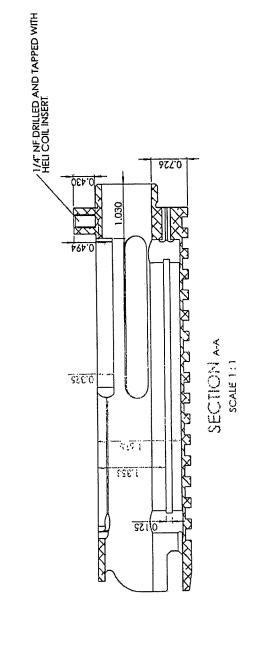
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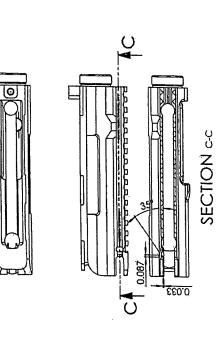
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This is **Exhibit "B"** referred to in the Affidavit of Wyatt Singer, sworn before me this <u>21</u> day of <u>cugust</u>, 2020.

A Commissioner for Oaths in and for the

Province of Alberta



November 3, 2017 RCMP: GFC-2000-7-1-181822

Inspection of Maccabee Defense, SLR-Multi Serial Number: AB02170002 Report

Purpose

The purpose of this inspection was to determine the legal classification of the subject firearm.

Findings

- The SLR-Multi is a newly manufactured and purpose-built receiver that is designed for semi-automatic fire only.
- The SLR-Multi has a two part receiver/frame. When disassembled, the lower receiver portion is considered to be the receiver/frame for regulatory purposes.
- The SLR-Multi receiver can meet the definition of a "non-restricted" firearm or a
 "restricted" firearm, depending on the barrel length and overall length of the firearm when
 the receiver is combined with various stocks and/or barrel lengths.
- As received, the SLR-Multi is a semi-automatic rifle that discharges centrefire ammunition, has a barrel length that is over 470 mm and an overall length above 660mm with the stock in the compressed position.

Conclusions

As received at Specialized Firearms Support Services Section, the Maccabee Defense, SLR-Multi, serial number AB02170002, semi-automatic rifle meets the legal classification of a "non-restricted" firearm.

The firearm may be found at FRT # 181822.

Bruce Macdonald Firearms Technician

Specialized Firearms Support Services

Firearms Investigative & Enforcement Services Directorate

RCMP-CFP

Specialized Policing Services

2017-11-03

This is **Exhibit "C"** referred to in the Affidavit of Wyatt Singer, sworn before me this 21 day of cugust, 2020.

A Commissioner for Oaths in and for the

Shi Oce

Province of Alberta

Date: 2017/11/03 Page: 1/3

Firearm Reference No.: 181822

Network Version 3,18.0 FRT Report

Summary

Maccabee Defense Make:

SLR-MULTI Model:

Manufacturer Specifications and Commercial Customization Maccabee Defense Manufacturer:

Level: Type:

Semi-Automatic Action:

Numbered CANADA Country of Manufacturer:

Non-Restricted Legal Classification: Serial Numbering:

Calibre, Shots and Barrel Length

Barrel Type Code	-	Manufacturer operations and Commercial Customization	
Barnel Legal Classification	Shots (mm) Legal Authority	5 473 Non-Restricted	CC 2 "firearm"
	Frearm Ref. No. Calibre	191922 - 1 223 REM	10.00

Notes

Make	- "IMACCABEE DEFENSE INC" is marked on the right side of the firearm underneath the accessory rail and on the left side of the receiver/frame directly under the magazine release lever the make may be marked as the accronym "MDI".
Model	- introduced in 2017. - "SLR-MULT" is marked on the left side of the receiver/frame. - "SLR-MULT" is marked on the left side of the receiver/frame. - "SLR-MULT" is marked on the left side of a T-Slot assembly interface reminiscent of the prototype AR-10A serial number XN03, a removable trigger housing and marked to the serial section of a T-Slot assembly interface in the section of a T-Slot assembly interface in the section of the sec
Manufacturer	- "MACCABEE DEFENSE INC." Is marked on the right side of the magazine housing of the receiver/frame and on the left side of the tirearm.

e marked as the accronym "MIDI".	
 the make may be marked as the 	- gas operated.
	Action

Firearms Reference Table. A National Police Service of the Royal Canadian Mounted Police. Network Version 3.18.0, 2017/11/03. All rights reserved, RCMP, 1998-2017.



FRT Report

Firearm Reference No.: 181822

Page: 2/3

Date: 2017/11/03

 serial number is marked on the left side of the receiver/frame directly under the Make and Model.
 serial number of a referenced example consisted of a two letter prefix (AB) and eight numbers. detachable box magazine Serial Number Shots

Canadian Law

- this fiream design is derived from an amalgamation of several different firearm designs and does not trace its design lineage directly or uniquely to a "prohibited" or a "restricted" firearm found in the Regulations appended to the Criminal Code.

Cross-References

Comments

No Data Retrieved

Maccabee Defense Model Multi

Also Known As/Product Code

Maccabee Defense Model MULTI SLR

Maccabee Defense Model MULTI-SLR

Maccabee Defense Model SLR

Maccabee Defense Model SLR MULTI

Maccabee Defense Multi

Maccabee Defense MULTI SLR

Maccabee Defense MULTI-SLR

Maccabee Defense SLR

Maccabee Defense SLR MULTI

MDI Model Multi

MDI Model MULTI SLR

MDI Model MULTI-SLR

MDI Model SLR

MDI Model SLR MULTI

MDI Model SLR-MULTI

MDI Multi

MDI MULTI SLR

MDI MULTI-SLR

MDI SLR

AMDI SLR MULTI

MDI SLR-MULTI

Firearm Reference No.: 181822

Date: 2017/11/03 Page: 3/3

> Model MULTI SLR Model MULTI-SLR Model Multi Model SLR

Model SLR MULTI

Multi

MULTISLR

MULTI-SLR

SLR

SLR MULTI

Year Dates

Importer

No Data Retrieved

No Data Retrieved

This is **Exhibit "D"** referred to in the Affidavit of Wyatt Singer, sworn before me this 2 day of cugust, 2020.

A Commissioner for Oaths in and for the

Province of Alberta



Firearm Reference No.: 181822

Date: 07/06/2020

Page: 1 / 3

Summary

Maccabee Defense Maccabee Defense SLR-MULTI Manufacturer: Model: Make:

Manufacturer Specifications and Commercial Customization

Type:

Level:

Semi-Automatic Action:

CANADA Country of Manufacturer: Serial Numbering:

Prohibited Legal Classification:

See Note

Calibre, Shots and Barrel Length

Eistern Dof No.	o liber		Barrel	Legal Classification		
LIFERING NO.	Calibre	SHOUS	(mm)	Legal Authority	Level	Darrel Type Code
181822 - 2	204 RUGER	5	473	Prohibited	Manufacturer Specifications and	
				PFR, Part 1, para. 87	Commercial Customization	
181822 - 1	223 REM	2	473	Prohibited	Manufacturer Specifications and	
				PFR, Part 1, para. 87	Commercial Customization	
181822 - 7	224 VALKYRIE	သ	473	Prohibited	Manufacturer Specifications and	
				PFR, Part 1, para. 87	Commercial Customization	
181822 - 3	300 AAC BLACKOUT	ιΩ	473	Prohibited	Manufacturer Specifications and	
				PFR, Part 1, para. 87	Commercial Customization	
181822 - 5	458 SOCOM	ည	473	Prohibited	Manufacturer Specifications and	
				PFR, Part 1, para. 87	Commercial Customization	
181822 - 6	6.5MM GRENDEL	ß	473	Prohibited	Manufacturer Specifications and	
				PFR, Part 1, para. 87	Commercial Customization	
181822 - 4	7.62X39 RUSSIAN	S	473	Prohibited	Manufacturer Specifications and	
				PFR, Part 1, para, 87	Commercial Customization	

Notes

Make

- "MACCABEE DEFENSE INC" is marked on the right side of the firearm underneath the accessory rail and on the left side of the receiver/frame directly under the magazine release lever.
- the make may be marked as the accronym "MDI".



Firearm Reference No.: 181822

Date: 07/06/2020

B Page: 2 / introduced in 2017.
 "SLR-MULTI" is marked on the left side of the receiver/frame.
 "SLR-MULTI" is marked on the left side of the receiver/frame.
 "SLR-MULTI" main features are the use of a T-Slot assembly interface reminiscent of the prototype AR-10A serial number XN03 locked by a captive take down screw or pin, a removable trigger housing and compatibility with many AR-15 components.
 features include: threaded muzzle for flash hider/muzzle brake, may have adjustable, foulding or optical sights; round, stainless steel barrel; gas block that may be adjustable, free floating handguard, accessory rail flat top upper receiver; ambidextrous cocking handle; right hand only or ambidextrous bolt catch, synthetic pistol grip and collapsible, standard or custom rifle buttstock; various colour finishes.
 and collapsible, standard or custom rifle buttstock; various colour finishes.
 overall length with a 473mm (18.63") barrel is 875mm (34.45") with the stock collapsed and 955mm (37.5/8") with the stock extended. - ".223 Wylde" calibre is marked on the barrel of this firearm. This designation is not the calibre of the firearm but a description of the chamber dimensions.
- the Wylde chamber is identical to the NATO STANAG chamber with a longer freebore to accommodate .224 inches (5.6MM) diameter commercial projectiles up to 80grs (5.18gm) mass. - "MACCABEE DEFENSE INC." is marked on the right side of the magazine housing of the receiver/frame and on the left side of the firearm. - the make may be marked as the accronym "MDI". serial number is marked on the left side of the receiver/frame directly under the Make and Model.
 serial number of a referenced example consisted of a two letter prefix (AB) and eight numbers.
 serial number of production models may consist of a two letter prefix and seven or eight numbers. detachable box magazine gas operated. Serial Number Manufacturer Calibre Model Action Shots

Cross-References

No Data Retrieved

Also Known As/Product Code

MDI MULTI SLR

MDI MULTI-SLR

MDI Model MULTI SLR

MDI Model MULTI-SLR

MDI Model Multi

MDI Model SLR

MDI Model SLR MULTI

MDI Model SLR-MULTI

MDI Multi

MDI SLR

MDI SLR-MULTI MDI SLR MULTI

MULTI SLR

MULTI-SLR

Firearms Reference Table. A National Police Service of the Royal Canadian Mounted Police. Version webFRT 2.11, May 2008. All rights reserved, RCMP, 1998-2008.



Maccabee Defense Model MULTI SLR Maccabee Defense Model MULTI-SLR

Maccabee Defense Model Multi Maccabee Defense Model SLR

Maccabee Defense MULTI-SLR

Maccabee Defense MULTI SLR

Maccabee Defense Model SLR MULTI

Maccabee Defense Multi Maccabee Defense SLR Maccabee Defense SLR MULTI

Model MULTI SLR Model MULTI-SLR

Model Multi

Model SLR

Model SLR MULTI

Firearm Reference No.: 181822

Date: 07/06/2020

Page: 3/ 3

Year Dates

SLR MULTI

Multi SLR No Data Retrieved

Importer No Data Retrieved

Firearms Reference Table. A National Police Service of the Royal Canadian Mounted Police. Version webFRT 2.11, May 2008. All rights reserved, RCMP, 1998-2008.



FRT - Glossary - Orders/Legal Authority

webFRT v2.11

Date: 07/06/2020

Page: 1 / 1

Title: PFR, Part 1, para. 87

Description:

87. The firearms of the designs commonly known as the M16, AR-10 and AR-15 rifles and the M4 carbine, and any variants or modified versions of them - other than one referred to in item 47, 49 or 50 of this Part.