



FORM 171A Rule 171

Statement of Claim

Court File No. T-3796-25

FEDERAL COURT

BETWEEN:

**Marie Pia Fazio
Plaintiff**

and

**Altus Business Consultants Limited
Sparkrock Incorporated Sparkrock Limited
Sparkrock Edsembli Incorporated
Sparkrock Canada Incorporated
Sparkrock U.S. Incorporated (formerly known as Altus
Business Consultants America Inc.)
Ember Investments Incorporated
Ionic Partners Limited Liability Company
Defendants**

(Court seal)

Statement of Claim

TO THE DEFENDANT:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or a solicitor acting for you are required to prepare a statement of defence in Form 171B prescribed by the Federal Courts Rules, serve it on the plaintiff's solicitor or, if the plaintiff does not have a solicitor, serve it on the plaintiff, and file it, with proof of service, at a local office of this Court

WITHIN 30 DAYS after the day on which this statement of claim is served on you, if you are served in Canada or the United States; or

WITHIN 60 DAYS after the day on which this statement of claim is served on you, if you are served outside Canada and the United States.

TEN ADDITIONAL DAYS are provided for the filing and service of the statement of defence if you or a solicitor acting for you serves and files a notice of intention to respond in Form 204.1 prescribed by the Federal Courts Rules.

Copies of the Federal Courts Rules, information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO DEFEND THIS PROCEEDING, judgment may be given against you in your absence and without further notice to you.

~~September 30, 2025~~ JW
OCT 01 2025

Issued by:



JANELLE WONG
REGISTRY OFFICER
AGENT DU GREFFE

(Registry Officer)

Address of local office: 180 Queen Street West
Suite 200
Toronto, Ontario
M5V 3L6

180, Rue Queen Ouest
Bureau 200
Toronto (Ontario)
M5V 3L6

TO: (Name and address of each defendant)

Altus Business Consultants Limited (c.o.b. "Altus Dynamics"), 122 Judge Road, Etobicoke, Ontario M8Z 5B7

Sparkrock Incorporated, 122 Judge Road, Etobicoke, Ontario M8Z 5B7

Sparkrock Limited, 100 King Street West, Suite 5700, Toronto, Ontario M5X 1B8

Sparkrock Edsembli Incorporated, 7111 Syntex Drive, 3rd Floor, Mississauga, Ontario L5N 8C3

Sparkrock Canada Incorporated, 100 King Street West, Suite 5700, Toronto, Ontario
M5X 1B8

Sparkrock U.S. Incorporated (fka Altus Business Consultants America Inc.), 21750
Hardy Oak Blvd, Ste 104, PMB 62757, San Antonio, Texas 78258, USA

Ember Investments Incorporated, 100 King Street West, Suite 5700, Toronto, Ontario
M5X 1B8

Ionic Partners Limited Liability Company, 101 Colorado Street, Suite 3604, Austin,
Texas 78701, USA

(Separate page)

Claim

1 The plaintiff claims: (*State here the precise relief claimed.*)

The Plaintiff will particularize her allegations with reference to documents already served upon the Defendants, including a cover letter and Addenda A–C (served August 28, 2025).

- a) **General Damages:** for wrongful dismissal, constituted psychological harassment and workplace violence, retaliation, and exploitation of professional expertise, breach of the duty of good faith, and intentional infliction of mental suffering by Defendants hereinafter referred to as: Sparkrock Edsembli Inc., Sparkrock Ltd., Sparkrock Canada Inc., Sparkrock U.S. Inc. (formerly known as Altus Business Consultants America Inc.), Altus Business Consultants Ltd (c.o.b. “Altus Dynamics”), Ember Investments Inc., and Ionic Partners LLC.
- b) **Special Damages:** including lost wages, benefits, and out-of-pocket costs arising from the Defendants’ misconduct.
- c) **Aggravated and Punitive Damages:** reflecting the Defendants’ deliberate use of multiple corporate identities, fraudulent payroll practices, fabricated work documents and pay statements, coordinated psychological abuse, and systemic workplace violence, as outlined in attachments Addenda A, B and C
- d) **Declaratory Relief that:**
 - The Defendants operated as a single integrated enterprise under common management and control; and
 - The Defendants’ conduct constitutes violations of employment and human rights standards, including those recognized in the Canada Labour Code, the Canadian Human Rights Act, the Charter of Rights and Freedoms, and, to the extent applicable, the Employment Standards Act (“ESA”) and the Ontario Human Rights Code, as well as international instruments including the Universal Declaration of Human Rights and relevant International Labour Organization (“ILO”) Conventions.
- e) **Compensation for Emotional and Reputational Harm:** the systemic targeting of the Plaintiff including the effects of sustained workplace abuse and violence on the Plaintiff’s health, dignity, future employment opportunities, reputational damage, and ability to participate fully in family and community life, as documented in Addendum C.
- f) **An Order for Immediate Issuance of Corrected Official Records:** within 30 days of the commencement of this proceeding, complete and corrected copies of

all the Plaintiff's official employment records, including but not limited to complete and corrected Records of Employment (ROEs), all outstanding statutory entitlements under the ESA and Canada Labour Code, pay statements and payroll records, termination of employment letter, and any other documentation required for the Plaintiff's official employment and legal records. Such records shall be provided in a usable format, suitable for evidentiary purposes.

- g) **An Order requiring the Defendants to provide the Plaintiff with a letter of reference** accurately reflecting her exemplary work performance, contributions, and achievements during her employment, for use in seeking future employment.
- h) **An Injunction restraining the Defendants from:** using, disclosing or misappropriating the Plaintiff's intellectual property, personal data, creative contributions, or professional work products, including any use or application of such work in the training of artificial intelligence ("AI") systems or in the development of software or commercial products for organizational, technological, or commercial gain without the Plaintiff's informed consent.
- i) **Pre- and Post-Judgment Interest:** pursuant to the Federal Courts Act and the Federal Courts Rules.
- j) **Interest and Costs of this Action:** on a substantial indemnity basis, and including such interim or advance costs as this Honourable Court may deem just and necessary to ensure the Plaintiff's ability to fairly pursue this proceeding.
- k) Such Further and Other Relief as this Honourable Court may deem just.
- l) A declaration that the Defendants' conduct constitutes violations of fundamental human rights, including protections against slavery, forced labour, degrading treatment, and workplace violence, and that such conduct forms part of a broader pattern of systemic abuse and international collusion, as documented in Addendum C. These violations are further affirmed in the Universal Declaration of Human Rights and International Labour Organization Conventions. The Defendants' conduct has caused profound personal, psychological, and economic harm to the Plaintiff, undermining her health, dignity, and ability to participate fully in society, professional, and family and community life.

(In consecutively numbered paragraphs, set out each allegation of material fact relied on to substantiate the claim.)

Pre-Litigation Conduct

The Plaintiff relies on documentary evidence contained in a legal package including a Cover Letter, and Addenda A, B and C, which were served upon Sparkrock on August 28, 2025. These documents were served upon the Defendants and are particularized in Addenda A–C, and detail the Defendants' payroll and employment record irregularities, workplace abuse and violence, and systemic collusion. This legal package is relied upon as substantiating proof of the allegations of material fact set out below.

Despite the Defendants being served with this material electronically and by registered mail by the Plaintiff, the Defendants refused to respond or engage, further evidencing their obstruction and bad faith. This includes:

- **August 28, 2025:** the Plaintiff served the above said legal package on the Defendants, which set out detailed evidence of payroll irregularities, workplace abuse, and systemic collusion.
- **August 29, 2025:** Due to the Plaintiff's experience of significant online fraud, she took steps to ensure service was valid by additionally sending the legal package via registered mail to the US and Canadian head offices.
- **The Plaintiff made multiple attempts to contact the Defendants directly by telephone and email regarding legal action.** After initial exchanges by email, the Defendants ceased responding, and calls to their Canadian and U.S. offices went unanswered. One call was eventually answered at the Canadian number, and the individual advised that they were based in Pakistan. The Plaintiff has retained recordings of these calls as evidence.
- **Following service of the Plaintiff's legal package, the Defendants referred the matter to legal counsel.** During email correspondence with their counsel, Mr. Jared Brown (law society number 47076Q), the Plaintiff was informed that the Defendants refuse to engage with her claims. The Plaintiff issued a formal record by email to both the Defendants and their counsel that their refusal served as an official record that all Sparkrock companies refused to investigate or settle as set out in the initial settlement offer by the Plaintiff. The Plaintiff was also unable to get a hold of the Defendant's counsel by phone despite repeated attempts, all interactions were limited to emails. The Plaintiff has retained recordings of these call attempts as evidence.
- The Defendants' refusal to engage, coupled with their evasiveness in communications and reliance on offshore staff with no apparent Canadian or American presence, further evidences a pattern of obstruction and bad faith in their dealings with the Plaintiff, and puts into serious question the legitimacy of their Canadian and US operations.

A. The Parties

1. The Plaintiff, Marie Pia Fazio, is a Canadian citizen and resides in Toronto, Ontario.
2. The Defendants are corporations and individuals carrying on business in Canada the United States, and internationally, operating as a single integrated enterprise under common management and control. The Defendants' use of multiple corporate names and inconsistent payroll practices, which create uncertainty and impede the Plaintiff, an ordinary citizen, from reconciling her own employment and pay statement records, thereby obstructing her ability to verify entitlements or assert her legal rights.
3. The Defendants include: Altus Business Consultants Limited, Sparkrock Incorporated, Sparkrock Limited, Sparkrock Edsembli Incorporated, Sparkrock Canada Incorporated, Sparkrock U.S. Incorporated (fka Altus Business Consultants America Inc.), Ember Investments Incorporated, Ionic Partners Limited Liability Company.

B. Employment and Relationship

4. **The Plaintiff's employment history with the Defendants' companies:** employed by Sparkrock Inc. from October 2021 to May 2022; by Sparkrock Ltd. from June 2022 to November 2022 (following acquisition by Ionic Partners); and by Sparkrock Edsembli Inc. from November 2024 to August 2025.
5. **The Plaintiff's role** as Proposal Manager, included leading and delivering sales proposals and complex project management, a function which management represented as accounting for 90% of the company's sales revenue.
6. **The Plaintiff consistently performed at an exemplary level**, exceeding expectations in her role as Proposal Manager and related duties. Her work was of high strategic value, as management represented it accounted for the majority of company revenue. The Plaintiff's performance was recognized through commissions and bonuses, and she frequently carried workloads beyond those of her colleagues while maintaining superior results.
7. **The Plaintiff was paid under multiple corporate identities of the Defendants** despite performing continuous work for a single enterprise. During the period November 2024 to August 2025, while employed solely by Sparkrock Edsembli Inc., deposits to her TD Bank account were issued under three different payor descriptors: "Altus Business Pay" (approximately March–August 2025), "Sparkrock Edsem Pay" (approximately November 2024–March 2025), and "Sparkrock Inc. AP" (approximately December 2024–January 2025).
8. **The Plaintiff's pay statements reflected inconsistent net pay** despite identical gross salary, unexplained deductions and reversals, and underpayment, amounting to the unlawful withholding and misappropriation of wages. These

inaccuracies carried downstream consequences, including how Employment Insurance ("EI") benefits are calculated on the basis of employer-reported insurable earnings, the Plaintiff's EI eligibility and benefit levels, further obstructing her access to statutory income supports during periods of unemployment.

C. Misconduct, Reprisals and Termination

- 9. Throughout her employment, in particular from January 2025 to August 2025, the Plaintiff was subjected to constituted psychological harassment and workplace violence, and exploitation of her professional expertise:** by numerous colleagues and managers, constituting coordinated harassment and intimidation, demeaning and abusive comments during meetings and on chat (Microsoft teams), delaying of projects critical to her daily work, verbal abuse during meetings, and excessive work overload in an effort to stress and demotivate the Plaintiff through psychological manipulation, as particularized in Addenda A through C.
- 10. The Defendants coordinated reprisals against the Plaintiff, culminating in her unlawful termination on August 25, 2025—the very day she intended to formally report the human-rights abuses she had been experiencing at Sparkrock.**

Particular incidents that are particularized in Addenda A, B and C, and the Plaintiff retained recordings of as evidence include, but are not limited to, the following:

- *The abuse escalated after the Plaintiff began documenting incidents on her private computer, leading her to reasonably believe that the Defendants had access to her files and were aware of her documentation. These parallels are particularized in Addendum A.*
- *The Plaintiff was abruptly reassigned to a new manager, a destabilizing tactic mirroring patterns of psychological manipulation the Plaintiff had previously experienced internationally. These parallels are particularized in Addendum C.*
- *The Plaintiff was subjected to an unscheduled meeting with her newly assigned manager. In this meeting, the Plaintiff was psychologically harassed, including questioning designed to suggest mental health concerns, which the Plaintiff experienced as a threatening tactic. These parallels are particularized in Addendum A.*
- *Immediately following this meeting, the Plaintiff was abruptly contacted by Ms. Bethany Francis, Vice President ("VP"), People and Culture, and the company's sole Human Resources ("HR") representative. Instead of addressing the Plaintiff's concerns, Ms. Francis verbally abused the Plaintiff and escalated minor issues into a hostile confrontation (as particularized in Addendum B). Given Ms.*

Francis's role as the only HR authority at Sparkrock Edsembli Inc., this conduct constituted a direct threat to the Plaintiff's livelihood, as it made clear that there was no safe internal support or channel for the Plaintiff to report abuse or protect her human rights. These parallels are particularized in Addendum A.

- On August 25, 2025, Ms. Francis instructed the Plaintiff to cancel a previously scheduled informal meeting regarding human rights concerns and suggested a call with her. During that call, Ms. Francis terminated the Plaintiff's employment. The termination occurred on the very day the Plaintiff intended to formally report ongoing human rights abuses to Ms. Francis, demonstrating that the Defendants acted in reprisal contrary to the Canadian Human Rights Act and the Employment Standards Act. These parallels are particularized in Addendum A.
- The Plaintiff consistently performed at an exemplary level prior to and during her employment with the Defendants, as demonstrated by her rehiring, recognition of achievements, and performance bonus payments. Her termination was not performance-related, but the result of targeting and reprisals, as particularized in the Addendum A and the forthcoming Affidavit by the Plaintiff.
- These reprisals constitute retaliation prohibited under the Canadian Human Rights Act and the Employment Standards Act. Numerous additional abusive and obstructive incidents are particularized, but not limited to, Addenda A and B.

11. The Defendants misappropriated the Plaintiff's professional work products including documents, templates, and project management outputs, and strategically used them for commercial gain and such as to train artificial intelligence systems, reference Addendum B.

D. Obstruction and Corporate Shell Game

12. The Defendants' shifting corporate identities and management, inconsistent payroll practices, and deliberate workplace obstruction made it impossible for the Plaintiff, as an overworked employee, to properly review her pay statements or evaluate the fraudulent practices being carried out. The Defendants intentionally created conditions of excessive workload, stress, and constant sabotage, which inhibited the Plaintiff's ability to document or challenge the misconduct in real time. These tactics form part of the pattern of psychological abuse and obstruction relied upon by the Plaintiff. This is particularized in Addenda A through C.

13. The Defendant's corporate changes were not incidental but were part of a deliberate pattern of concealment and obstruction: to obscure accountability and impede the Plaintiff's ability to assert rights.

E. Broader Context and Collusion

14. The misconduct of the Defendants was intertwined with systemic abuse by other institutions, including TD Bank and the Canada Revenue Agency.

These issues are the subject of related Federal Court proceedings brought by the Plaintiff (Court File Nos. T-3431-25 and T-3726-25). The Plaintiff relies on the existence of these proceedings not to expand the scope of this claim, but to demonstrate the broader context of systemic collusion in which the Defendants' actions formed an integral part.

15. The Defendants' actions formed part of a broader pattern of systemic workplace abuse extending internationally. As documented in Addendum C, the Plaintiff experienced mirrored tactics of harassment, reprisals, and workplace violence while working abroad. This demonstrates that the misconduct of the Defendants in Canada was connected to, and consistent with, an international system of collusion and targeting.

F. Harm to the Plaintiff

16. **As a result of the Defendants' willful misconduct**, the Plaintiff suffered significant loss of income, benefits, and professional reputation. The Plaintiff also suffered profound psychological trauma, undermining her health, dignity, and ability to participate fully in family and community life. These harms were compounded by the fact that the Plaintiff was targeted as a whistleblower for raising, and intending to raise, concerns about human-rights abuses in the workplace, making her termination an unlawful reprisal.
17. **Evidence of Fraud, Mismanagement, and Wilful Misconduct:** The Plaintiff was paid under multiple corporate identities, and her work was repeatedly tied to fabricated or sham projects, including false websites, fictitious contacts, and fabricated names, emails, and phone numbers. The Plaintiff raised these concerns on multiple occasions with senior management, but no corrective action was taken. Instead, when the Plaintiff began documenting these practices, the abuse against her intensified, culminating in her unlawful termination.
18. **Senior management at Sparkrock were repeatedly informed by the Plaintiff of fraudulent and obstructive work practices**, including sham websites, fictitious contacts, security vulnerabilities such as fake profiles in Microsoft Teams, missing documents from files, and failing projects and technologies that directly impaired her ability to perform her job. Despite these reports, the Defendants took no corrective action. Their failure to address the concerns, and the escalation of abuse following the Plaintiff's documentation of these practices, demonstrate willful misconduct and a deliberate pattern of reprisal. These issues are documented in Addenda A and B.

The plaintiff proposes that this action be tried at Ottawa, Ontario.

September 30, 2025

A handwritten signature in black ink, appearing to read "Marie Pia Fazio". The signature is written in a cursive style with a large, sweeping flourish at the end.

(Signature of solicitor or plaintiff)

Marie Pia Fazio, 815 Shaw Street, Toronto, Ontario, M6G 3L9, 647-203-8890,
marie@mapiaconsulting.com

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