

ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)

**IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT,
R.S.C. 1985, c. C-36, AS AMENDED**

**AND IN THE MATTER OF A PLAN OF COMPROMISE OR ARRANGEMENT OF
HUDSON'S BAY COMPANY ULC / COMPAGNIE DE LA BAIE D'HUDSON SRI, et al.**

TO: THE SERVICE LIST

FACTUM OF THE CLAIMANT

ROBERT RENE TURPIN

Head of the House of Turpin

558 High Street South

Thunder Bay, Ontario

P7B 3M5

rturpin15@gmail.com

Phone: 1-807-889-1182

Claimant in Person

TABLE OF CONTENTS

PART I – OVERVIEW 3-4

PART II – FACTS..... 4-5

PART II(A) – PROOF OF FACTS 5-8

D. Fur Trade Lineage and Multi-Regional Participation..... 8

Amable (“Ambo”) Turpin (1775–1858)8-9

Jean-Baptiste Toupin / Turpin (1792–1862)9

Pierre-Alexandre Turpin (1641–1709) 9-10

Additional Connections to the Fur Trade through Pierre Alexander Turpin.....10-11

ADDITIONAL HISTORICAL AND ARCHIVAL CONTEXT 11-14

PART III – ISSUES 14

PART IV – LAW AND ARGUMENT 14

THE CLAIM IS NOT “UNSUBSTANTIATED”14-15

B. DUTY TO INVESTIGATE.....15

C. CHAIN OF TITLE AND HISTORICAL INTERESTS.....15

D. THE LAND ENTITLEMENT AND RESTITUTION CLAIM.....16

E. THE PROPOSED SOVEREIGN COVENANT.....17

F. THE \$360,000,000 CHARTER ACQUISITION PROPOSAL.....18

PART V – ORDER REQUESTED 18-19

PART I – OVERVIEW

The Claimant submits that the archival evidence demonstrates:

1. a documented, unextinguished land entitlement rooted in the proprietary holdings of Joseph Turpin and Baptiste Turpin within the Red River Settlement;
2. verified land census returns showing explicit tract possession, occupancy, and development by the Turpin lineage;
3. that the \$30,000,000 Restitution Claim represents a prior proprietary interest over these unextinguished land assets, which must be fully resolved before any assets or Hardship Funds are distributed to third parties; and
4. that the Monitor’s failure to investigate the specific land census volumes and tract allocations cited constitutes a breach of its investigative duties under the CCAA framework. (CCAA – “Companies’ Creditors Arrangement Act”)
5. The Claimant further submits that the proposed \$360,000,000 Charter Acquisition and Generational Stewardship Framework represent a commercially sustainable alternative to liquidation, intended to preserve the historical integrity of the original 1670 Royal Charter while generating long-term public revenue through museum exhibition and heritage licensing arrangements.
6. The Claimant submits that a sufficient “Physical Showing” has been completed through the Certified Evidence Package filed March 27, 2026, including archival and genealogical documentation tied to:
 - (a) HBCA Record Series B.239/g/1-4;
 - (b) HBCA Record Series E.5/3-6;
 - (c) HBCA Record B.115/d/7;
 - (d) HBCA Record F.4/32;
 - (e) Tanguay collection Version 7;
 - (f) related genealogical records and census documentation.

7. The Claimant further submits that archival evidence demonstrates:
 - (a) a documented Turpin lineage connected to Hudson’s Bay Company historical operations;
 - (b) verified census and settlement records relating to Joseph Turpin (1785);
 - (c) historical land occupancy and proprietary interests within the Red River Settlement; and
 - (d) unresolved questions concerning transfer and disposition of archival and Charter-related interests.
 8. The Claimant further submits that the Monitor failed to adequately investigate the archival codes specifically identified by the Claimant before concluding the claim was “unsubstantiated.”
-

PART II – FACTS

9. The Claimant relies on the following records:
 - (a) HBCA Biographical Summary relating to Joseph Turpin;
 - (b) HBCA Record Series E.5 (Consolidated Land Census Returns, 1829–1832);
 - (c) HBCA Record Series B.239/g/1-4 (Northern Department Abstracts);
 - (d) HBCA Record F.4/32; (Financials)
 - (e) HBCA Record B.115/d/7 (Lesser Slave Lake Equipment Book)
 - (f) genealogical records from the Tanguay Collection; and
 - (g) ancestral family tree documentation.
10. The records identify Joseph Turpin (1785) as connected to North West Company and Hudson’s Bay Company operations between approximately 1811 and 1832.
11. The Claimant submits that the E.5 census records document land occupancy, farming activity, and settlement presence connected to the Turpin lineage within the Red River Settlement.

12. The Claimant further submits that no evidence has been produced establishing that these historical interests were expressly extinguished, surrendered, or settled prior to the 1994 transfer of archival and related interests.
 13. The Claimant states that he requested review and verification of specific archival codes including:
 - (a) B.239/g/1-4;
 - (b) E.5/3-6;
 - (c) B.115/d/7;
 - (d) F.4/32;
 - (e) RG2/7/702; (Unable to obtain due to permission and access issues)
 - (f) B.239/u/1 microfilm records. (Unable to obtain due to permission and access issues)
 14. The Claimant submits that the Monitor has not confirmed whether these records were physically reviewed before rejecting the claim.
-

PART II(A) – PROOF OF FACTS

15. The Claimant's land entitlement claim is directly founded upon the historical land holdings of Joseph Turpin and Baptiste Turpin in the Red River Settlement, as recorded by the Hudson's Bay Company.
16. The specific evidence of this land entitlement is contained within HBCA Record Series E.5/3-6 (Consolidated Land Census Returns), which documents the exact lot dimensions, cultivated acreage, and property descriptions held under the Turpin name.
17. These records establish a distinct, private proprietary interest in specific land tracts. The Claimant has provided the Monitor with explicit notice of these locations, including the evidence receipts dated January 4, 2026 (Notice of Interest), February 4, 2026 (Notice of Objection), and February 9, 2026 (Filing Confirmation).
18. No documentation has been produced by the Monitor or the Debtors demonstrating that the land titles originally possessed by Joseph Turpin and Baptiste Turpin (Descendants of

Pierre Alexander Turpin) were ever lawfully surrendered, expropriated with compensation, or extinguished prior to subsequent corporate or provincial transfers.

19. The Claimant submits that the following documentary and archival materials constitute the evidentiary foundation of the claim:

(a) HBCA Record Series B.239/g/1 identifying Joseph Turpin (1785) within the Northern Department Abstracts and Company financial records;

The attached link provides supporting documents that originate from the Dropbox repository Maintained and sent by the HBCA Archives Team:

<https://www.dropbox.com/scl/fo/xv2627i3pa7l3y32y8mx7/ALvVbu7TF7O6P4TFEAAQj4o?rlkey=dods9aeobli4uib3ymc9q4h0k&st=n87fm0lm&dl=0>

(b) HBCA Record Series E.5/3-6 documenting census and land occupancy records within the Red River Settlement between 1829 and 1832;

The attached link provides supporting documents that originate from the Dropbox repository Maintained and sent by the HBCA Archives Team:

<https://www.dropbox.com/scl/fo/xv2627i3pa7l3y32y8mx7/ALvVbu7TF7O6P4TFEAAQj4o?rlkey=dods9aeobli4uib3ymc9q4h0k&st=n87fm0lm&dl=0>

(c) HBCA Record F.4/32 documenting administrative and commercial activity associated with the Turpin family prior to the 1821 merger between the North West Company and Hudson's Bay Company;

The attached link provides supporting documents that originate from the Dropbox repository Maintained and sent by the HBCA Archives Team:

<https://www.dropbox.com/scl/fo/xv2627i3pa7l3y32y8mx7/ALvVbu7TF7O6P4TFEAAQj4o?rlkey=dods9aeobli4uib3ymc9q4h0k&st=n87fm0lm&dl=0>

d) HBCA Record B.115/d/7 documenting the high-value equipment, capital assets and inventory owned and operated by Joseph Turpin;

The attached link provides supporting documents that originate from the Dropbox repository Maintained and sent by the HBCA Archives Team:

<https://www.dropbox.com/scl/fo/xv2627i3pa7l3y32y8mx7/ALvVbu7TF7O6P4TFEAAQj4o?rlkey=dods9aeobli4uib3ymc9q4h0k&st=n87fm0lm&dl=0>

(e) genealogical records from the Tanguay Collection confirming ancestral lineage connections tied to the historical records;

Tanguay Collection book, Volume 7, pages 389-390 (Book title “Dictionnaire genealogique des familles canadiennes depuis la foundation do la colonie jusqu’a nos jours”

[Dictionnaire généalogique des familles canadiennes depuis la fondation de la colonie jusqu'à nos jours - Google Play Books](#)

(f) biographical sheets and archival summaries produced by the Hudson’s Bay Company Archives identifying Joseph Turpin’s service between approximately 1811 and 1832;

[Biographies | Hudson's Bay Company Archives | Archives of Manitoba](#)

Hudson’s Bay Company Archives - Biographical Sheets, Under “T” for Joseph Turpin.

(g) supporting ancestral family tree documentation establishing the continuity of the Turpin lineage.

<https://ancestorbios.blogspot.com/2018/08/a-partnership-in-fur-trade-pierre.html> also <https://ancestorbios.blogspot.com/2018/11/a-settler-of-old-kaskaskia-joseph-turpin.html> further ancestry information, <https://mdenney.proboards.com/thread/646/turpin-family-history-partial>, <https://ancestorbios.blogspot.com/2018/08/a-partnership-in-fur-trade-pierre.html> , Joseph Turpin information of his life and the marriage to M. Angelique Makwa of Slave Lake. https://www.wikitree.com/wiki/Turpin-397#_note-8

20. The Claimant submits that the records establish the following factual points:

(a) Joseph Turpin (1785) participated in North West Company and Hudson’s Bay Company operations during the early 18th century;

(b) members of the Turpin lineage held documented settlement, farming, and occupancy interests within the Red River Settlement;

(c) the identified records are official archival materials maintained through Hudson's Bay Company and related Crown archival systems;

(d) the archival references relied upon are capable of direct verification through the identified HBCA codes and records; and

(e) no documentary record has been produced to the Claimant demonstrating an express extinguishment, surrender, or settlement of the historical interests identified in the archival materials.

21. The Claimant further submits that the identified archival references form part of a continuous historical record predating the modern corporate restructuring and archival transfer processes referenced by the Applicants.

22. The Claimant states that the Certified Evidence Package filed March 27, 2026 was intended to satisfy the Court's requirement for a "Physical Showing" by providing specific archival codes, census references, genealogical records, and historical documentation capable of independent verification.

23. The Claimant further submits that the evidentiary burden shifted once the specific archival references and source materials were identified, and that the Monitor was obligated to conduct a reasonable review of the identified records before characterizing the claim as "unsubstantiated."

D. Fur Trade Lineage and Multi-Regional Participation

24. The Claimant submits that the Turpin lineage includes multiple documented individuals engaged across major fur trade systems.

Amable ("Ambo") Turpin (1775–1858)

25. Archival records identify Amable Turpin, also recorded in some sources as "Ambo," as a French-Canadian voyageur and labourer operating within the HBC system.

26. He is associated with fur trade routes linking Montreal, Prairie du Chien, Red River, and York Factory, reflecting mobility within the HBC labour structure.

Jean-Baptiste Toupin / Turpin (1792–1862)

27. Archival records identify Jean-Baptiste Toupin/Turpin as an interpreter and HBC employee operating in the Columbia District.

28. His service includes postings at Fort Colville and Fort Nez Percés, and participation in expeditionary activity in the Pacific Northwest region.

29. He is further associated with later settlement in the Willamette Valley (French Prairie region), consistent with early Métis migration patterns west of the Rockies.

Pierre-Alexandre Turpin (1641 – 1709)

30. Pierre-Alexandre Turpin (1641 – 1709), also known as Alexandre Turpin dit Sandrille, was a prominent French merchant, fur trader, military arms master, and property owner in early New France. Historical records identify him as a Maître d’armes (Master of Arms), a position reflecting military authority and trusted status within the colonial administration of 17th-century Quebec.

31. Turpin later expanded his influence through extensive involvement in the western fur trade, where he operated as an Engageur Ouest, organizing trading expeditions, managing voyageurs, and conducting commercial operations throughout the Great Lakes, Detroit, and Illinois regions. He established seasonal trading operations in Montreal and participated in large-scale fur commerce with Indigenous trading networks, including commercial partnerships involving firearms and trade goods.

32. Archival records further indicate that Turpin accumulated significant personal wealth through diversified business ventures, including private lending, commercial merchandising, and the importation and sale of valuable goods such as wine and trade supplies throughout the colony.

33. As his commercial success expanded, Turpin acquired substantial property holdings and was legally identified in historical records as a “bourgeois,” reflecting his status as a

financially established landholding citizen within New France. Records indicate that he owned multiple residences, collected rental income from tenants in Montreal and Quebec City, and established family land interests that extended through subsequent generations into territories including Kaskaskia, Illinois.

34. The Claimant submits that these historical records demonstrate that Pierre-Alexandre Turpin occupied a position of significant commercial influence, landholding authority, and economic power within the early colonial fur trade and settlement systems connected to New France and the broader Hudson's Bay and western trade regions.

<https://ancestorbios.blogspot.com/2018/08/a-partnership-in-fur-trade-pierre.html>

Additional connections to the fur trade through Perre Alexander Turpin

35. As quoted below it indicates that the Turpin's were invested in large areas of the fur trade and linked to Pierre Esprit Radisson:

(a) "17th Century Fur-Trade and Military-Expedition Families Diane Wolford Sheppard, FCHSM member – ©2014 - All rights reserved 1

(b) 17th Century Fur-Trade and Military-Expedition Families Diane Wolford Sheppard, FCHSM member

(c) 17th century fur-trade families include families who travelled to the Great Lakes, Huronia, Hudson Bay, Labrador, or the Mississippi Valley, merchants, and families who travelled to the Great Lakes on military expeditions. The list was developed over a number of years from a wide variety of sources.¹

(d) An asterisk following a name indicates that the individual was personally involved in the fur or liquor trade or military expeditions to the Great Lakes.

#193. Alexandre Turpin* and Catherine Delor

Alexandre Turpin, fils, Jean Baptiste Turpin”

(e) This was during or before Charles II awarded a royal charter to the Hudson's Bay Co. granting the rights to all the commerce to the entire drainage known as Rupert's Land and covering 1.5 million square miles from Rocky Mountains to North Dakota. Where

Turpin's also worked the lands and started colonies with Indigenous people. (reference with History Link.org Essay 9881): (Hudson's Bay Company, by Jack and Claire Nisbet)

<https://genepoulin.net/public/17sc-FurTrade-Expedition.pdf>

ADDITIONAL HISTORICAL AND ARCHIVAL CONTEXT

36. (a) Historical and archival records, including records maintained by the Hudson's Bay Company Archives ("HBCA"), regional land registries, and related historical sources, demonstrate that Joseph Turpin, Senior and his family occupied, cultivated, improved, and exercised longstanding possessory rights over agricultural lands within the Red River Settlement prior to their displacement from the region.
- (b). Before relocating to the Fort Snelling region in or about 1831, Joseph Turpin, Senior resided near Fort Garry in the Selkirk Settlement, where he established a working farm together with other French-Canadian and Métis families, including the Rondeau family. These lands were cleared, farmed, occupied, and treated as established family property under customary landholding systems recognized within the Métis community.
- (c). The historical evidence demonstrates that Métis and French-Canadian settlers who built and sustained these settlements were systematically denied secure legal recognition of their landholdings by Hudson's Bay Company administration. Although these families occupied and developed the land for generations, they were frequently refused formal registered title protections, leaving their properties vulnerable to seizure, displacement, and transfer during subsequent colonial expansion.
- (d). Following the Red River Resistance of 1869–1870 and the arrival of the Wolseley Expedition, Métis and French-Catholic residents were subjected to intimidation, violence, coercion, and dispossession. Historical accounts document assaults, threats, destruction of property, and unlawful occupation of established river lots by incoming settlers and speculators. Existing occupants were frequently denied meaningful protection by newly established governmental and legal institutions.
- (e). Archival records identify Joseph Turpin, also referenced in certain registries under related family names including Toutpetite and Vermette, as associated with HBC Lot

1514 within the Red River Settlement. The historical record indicates that the Turpin family's possessory rights, agricultural holdings, and longstanding occupation of these lands were ultimately extinguished or transferred without meaningful protection or compensation during the expansion of Canadian settlement and administration.

(f). The evidence further demonstrates that Joseph Turpin, Senior later relocated with other displaced Métis and French-Canadian families to the Fort Snelling region near present-day St. Paul and Minneapolis, where they again established productive farming settlements. Historical records from the Minnesota Historical Society and American State Papers describe subsequent military removals of these settlers in or about May 1840, including destruction of homes belonging to Joseph Turpin and neighboring families.

(g). In 1856, Joseph Turpin, Senior obtained a United States Federal Land Patent recognizing ownership of approximately 131 acres (See attached photo proof). This patent constitutes formal governmental recognition of his status as an independent agricultural landholder and demonstrates continued efforts to secure lawful title protections after prior displacement.

94

THE UNITED STATES OF AMERICA,

The Great Seal
CERTIFICATE
No. 385.

To all to whom these Presents shall come, Greeting:

WHEREAS Joseph Sharpin, Senior, of Dakota County, Minnesota,

has deposited in the GENERAL LAND OFFICE of the United States, a Certificate of the REGISTER OF THE LAND OFFICE, at Minneapolis, whereby it appears that full payment has been made by the said Joseph Sharpin, Senior,

according to the provisions of the Act of Congress of the 24th of April, 1820, entitled: "An act making further provision for the sale of the Public Lands," for

the lot numbered one; and the South East quarter of the North West quarter, and the North West quarter of the North East quarter, of Section nine, in Township twenty South, of Range twenty three in the district of Kansas subject to sale at Minneapolis, Minnesota, containing one hundred and thirty acres or a fifty hundredths of an acre,

according to the official plat of the Survey of the said Lands, returned to the General Land Office by the SURVEYOR GENERAL, which said tract has been purchased by the said Joseph Sharpin, Senior,

NOW KNOW YE, That the United States of America, in consideration of the premises, and in conformity with the several acts of Congress, in which case made and provided, HAVE GIVEN AND GRANTED, and by these presents DO GIVE AND GRANT, unto the said Joseph Sharpin, Senior,

unto his heirs, the said tract above described: TO HAVE AND TO HOLD the same, together with all the rights, privileges, immunities, and appurtenances of whatsoever nature, therunto belonging, unto the said Joseph Sharpin, Senior and to his heirs and assigns forever.

In Testimony Whereof, I, Franklin Pierce, PRESIDENT OF THE UNITED STATES OF AMERICA, have caused these Letters to be made PATENT, and the SEAL of the GENERAL LAND OFFICE to be hereunto affixed.

Given under my hand, at the CITY OF WASHINGTON, the fifteenth day of January, in the Year of our Lord one thousand eight hundred and fifty six, and of the Independence of the United States the thirty eighth.

BY THE PRESIDENT: Franklin Pierce
H. E. Baldwin aft Secy
J. H. Grainger RECORDER of the General Land Office.

4195



(h). Government and archival records relating to the Turpin family contain inconsistencies in spelling, naming conventions, and recorded signatures, including variations such as “Toupin”, “Trupin”, “Toupin”, “Terpin”, “Thorfinnr”, “Toulpin”, “Turvin”, “Turpinus”, “Terpene”, “Turpen” and “Vermette.” These inconsistencies complicated subsequent tracing of land claims, scrip applications, and transfers involving Métis and French-Canadian families whose lands were alienated during settlement expansion.

(i). The Claimant submits that the historical evidence demonstrates a sustained pattern of displacement, denial of secure title, and loss of ancestral lands experienced by the Turpin family through governmental, military, and administrative actions connected to colonial settlement expansion in both Canadian and American jurisdictions.

PART III – ISSUES

37. The issues before the Court are:

- (a) whether the Claimant has provided sufficient documentary evidence to justify further investigation of the claim;
- (b) whether the Monitor fulfilled its investigative obligations concerning the archival materials identified by the Claimant; and
- (c) whether additional relief should be granted preserving the status quo pending review of the identified archival materials.

PART IV – LAW AND ARGUMENT

A. THE CLAIM IS NOT “UNSUBSTANTIATED”

38. The Claimant submits that the documentary record filed with the Court constitutes sufficient evidence to warrant review and investigation.

39. The archival materials relied upon are official Hudson's Bay Company Archives records and related historical census documentation.
40. The Claimant submits that the records establish a continuous historical connection between the Turpin lineage and Hudson's Bay Company settlement activity and land occupancy.
41. The Claimant further submits that the Monitor cannot characterize the claim as unsupported while declining to fully review the archival references specifically identified by the Claimant.

B. DUTY TO INVESTIGATE

42. The Monitor, as an officer of the Court, is required to conduct fair and objective investigations concerning matters affecting the estate.
43. The Claimant submits that the identified archival references are capable of verification within the Hudson's Bay Company archival system and could be reviewed with minimal burden.
44. The Claimant further submits that failure to review the identified archival records before rejecting the claim constitutes an incomplete investigation.

C. CHAIN OF TITLE AND HISTORICAL INTERESTS

45. The Claimant submits that the historical records raise unresolved questions concerning:
 - (a) historical settlement interests;
 - (b) archival title continuity; and
 - (c) whether all relevant historical interests were addressed prior to the 1994 transfer.
46. The Claimant relies on the principle that valid transfers require lawful authority and proper title.
47. The Claimant submits that further investigation is necessary before the Court accepts that all historical interests were conclusively extinguished.

D. THE LAND ENTITLEMENT AND RESTITUTION CLAIM

48. The Claimant submits that an unextinguished land entitlement constitutes a property right that survives corporate reorganizations and transfers. Because the land records in Series E.5/3-6 establish a prima facie proprietary interest held by Joseph and Baptiste Turpin, the burden shifts to the Monitor to prove that these specific land entitlements were legally terminated.
49. The Claimant has quantified the value of this unextinguished land entitlement and the deprivation of its usage at \$30,000,000.
50. This \$30,000,000 Restitution Claim is a prior proprietary claim against the estate's historical assets. The Claimant submits that it would be a denial of natural justice and a breach of the court's oversight role to permit the distribution of "Hardship Funds" to third-party claimants while a prior, documented land entitlement claim remains uninvestigated and unresolved.
51. The Claimant submits that the historical and archival materials identified in the Exhibits establish the basis for a Restitution Claim arising from the historical integration, use, and transfer of proprietary interests associated with the Turpin lineage.
52. The Claimant states that the archival records document:
- (a) historical occupancy and settlement interests connected to the Red River Settlement;
 - (b) commercial and administrative participation within North West Company and Hudson's Bay Company operations;
 - (c) recognized census and landholding records tied to the Turpin lineage; and
 - (d) continued archival recognition of those historical interests through official HBCA documentation.
53. The Claimant submits that no documentary evidence has been produced demonstrating that these historical interests were lawfully extinguished, surrendered, bought out, or otherwise resolved prior to the subsequent corporate restructuring and archival transfer processes.

54. The Claimant therefore maintains a Restitution Claim in the amount of \$30,000,000 arising from:
- (a) the alleged extinguishment or transfer of unresolved historical interests;
 - (b) the alleged loss of proprietary and historical value connected to the archival records;
 - (c) the alleged failure to recognize and investigate the identified lineage and archival evidence; and
 - (d) the alleged ongoing prejudice caused by the disposition of historically significant assets without full review of the identified records.
55. The Claimant further submits that the requested restitution is intended as a proposed framework for reconciliation, preservation, and long-term stewardship rather than solely as a monetary recovery mechanism.
56. The Claimant states that the proposed stewardship and licensing framework outlined in the Sovereign Covenant proposal was developed as a commercially sustainable alternative to permanent liquidation of historically significant materials.
57. The Claimant submits that the Court should preserve the status quo pending further investigation and determination of the unresolved archival and historical issues raised in this proceeding.

E. THE PROPOSED SOVEREIGN COVENANT

58. The Claimant has proposed an alternative stewardship and licensing model intended to preserve public access while generating recurring revenue.
59. The proposal includes:
- (a) continued public exhibition access;
 - (b) recurring museum-based revenue generation; and
 - (c) a long-term heritage stewardship structure.
60. The Claimant submits that this proposal should be considered as an alternative to permanent liquidation of historically significant assets.

F. THE \$360,000,000 CHARTER ACQUISITION PROPOSAL

61. (a) THE \$360,000,000 CHARTER ACQUISITION PROPOSAL

Two Separate Claims: I, Robert Rene Turpin, clarify that this commercial proposal is completely separate from my \$30,000,000 Restitution Claim. The \$30,000,000 claim is for the historical abuse, theft, and displacement of my family from their lands. This \$360,000,000 proposal is a separate business solution to help settle the debtor corporation's outstanding liabilities.

(b) The \$360,000,000 Acquisition: I submit a formal proposal to acquire full ownership and title of the original 1670 Royal Charter for a total valuation framework of \$360,000,000. This structural solution is designed to inject value into these proceedings and systematically reduce the debt profile accumulated by the modern Hudson's Bay Company entities.

(c) 60-Year Generational Guardianship: Upon approval, the legal title and custodial administration of the 1670 Charter will transfer to the Turpin family under a 60-year multi-generational guardianship framework.

(d) Museum Exhibition & Ticket Options: The Charter and authenticated duplicates will be displayed in public museums across Canada with a tiered ticket surcharge system ranging from \$0.50 to \$2.00 CAD per ticket depending on venue size.

PART V – ORDER REQUESTED

62. The Claimant respectfully requests:

(a) an Order directing the Monitor to conduct a targeted physical evaluation of the land census records under HBCA Series E.5/3-6 specifically concerning the property lines of Joseph Turpin and Baptiste Turpin;

(b) an Order stating and restraining the distribution or allocation of any Hardship Funds to third parties pending the final determination of the Claimant's \$30,000,000 Land Restitution Claim; and

- (c) such further and other relief as this Honourable Court deems just.
- (d) an Order directing the Monitor to confirm whether the identified archival materials were physically reviewed;
- (e) an opportunity for further evidentiary review concerning the identified archival records;
- (f) preservation of the relevant archival assets pending investigation;
- (g) consideration of the Claimant's proposed stewardship and restitution framework;
- (h) such further and other relief as this Honourable Court deems just.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

DATED at Thunder Bay, Ontario

Robert Rene Turpin
Self-Represented Claimant