

Federal Court



Cour fédérale

Date: 20250527

Docket: T-1832-24

Citation: 2025 FC 950

Ottawa, Ontario, May 27, 2025

PRESENT: The Honourable Madam Justice Saint-Fleur

BETWEEN:

MATTHEW BULGER

Applicant

and

ATTORNEY GENERAL OF CANADA

Respondent

JUDGMENT AND REASONS

I. Overview

[1] The Applicant, Mr. Matthew Bulger [Applicant], seeks judicial review of a Canada Revenue Agency [CRA] officer's decisions which found him ineligible for the Canada Recovery Benefit [CRB] and the Canada Emergency Response Benefit [CERB] [the "Benefits"].

[2] In two separate decisions dated July 15, 2024, the CRA officer found after a second review that the Applicant was ineligible for the Benefits because he failed to meet the statutory requirement of having made at least \$5,000 in 2019 or in the 12-month periods preceding the days on which he applied for each of the Benefits [Decisions]. Due to differing statutory requirements, the 2020 period was also considered for the CRB refusal.

[3] The Applicant argues that the Decisions are procedurally unfair and unreasonable because they did not give him enough information to understand how the CRA officer determined that he was not eligible. The Applicant submits that, as a result, he was denied the opportunity to present the information required to prove his eligibility.

[4] The Applicant's submissions challenged all decisions rendered in his file, including the first review and second review decisions of both his CRB eligibility and his CERB eligibility. The first review decisions were not the final decisions in the Applicant's file and are thus not properly before this Court. Concerning the second review decisions, the Respondent accepts that, since both decisions were made by the same decision-maker, are based on the same record, under two related statutes, and on the same legal basis, it is in the interests of justice and expediency to consider both decisions dated July 15, 2024, together in this application. I agree.

[5] The Respondent submits that the Decisions dated July 15, 2024, were procedurally fair and reasonable; the Applicant knew the reason he was denied the Benefits and was provided multiple opportunities to respond, and the CRA officer reasonably found the Applicant ineligible because she was unable to verify his income from the documentation provided. The Respondent accordingly asks the Court to dismiss the application.

[6] For the reasons that follow, this application for judicial review is dismissed without costs.

II. Background Facts

[7] The CRA is responsible for administering the Benefits. The Benefits were issued in intervals, based on applications made for each “application period,” as defined in the *Canada Recovery Benefits Act*, SC 2020, c 12, s 2 [CRB Act] and *Canada Emergency Response Benefit Act*, SC 2020, c 5, s 8 [CERB Act].

[8] The Applicant applied for the CERB for seven, four-week periods from March 15, 2020, to September 26, 2020, submitting his initial application on April 6, 2020. He applied for the CRB for 27, two-week periods from September 27, 2020, to October 9, 2021, submitting his initial application on October 14, 2020.

[9] On March 10, 2023, the CRA advised the Applicant it was conducting a review of his CERB and CRB eligibility. As part of its review, the CRA asked the Applicant to provide proof of at least \$5,000 income in 2019, 2020, or the 12-month period preceding his original applications. The Applicant did not respond to this letter. The CRA officer conducting the first review of the Applicant’s eligibility [First Reviewer] attempted to call the Applicant on two occasions, but he never called back.

[10] The CRA advised the Applicant in writing that no reply had been received to its March 10, 2023, letter and stated he could still submit documents to prove his income. On September 14, 2023, the Applicant spoke with a CRA officer about his benefit eligibility and the letters he had received. He subsequently submitted documents on September 14, 2023, including a letter

explaining that, prior to COVID-19, he had worked as a self-employed babysitter for two of his younger relatives and was paid by his mother for these services through a joint bank account. He also included examples of receipts and account statements from the joint bank account.

[11] On March 20, 2024, the First Reviewer determined the Applicant was not eligible for either the CERB or CRB as he did not meet the \$5,000 income threshold. The CRA Notepad notes indicate that the rationale for the decision was that the Applicant's submitted receipts did not demonstrate \$5,000 of services, the bank statement without receipts could not be used as proof of income, and a T2125 would need to have been submitted.

III. Decision Under Review

[12] The Applicant requested a second review of his CERB and CRB eligibility, wherein he submitted additional information and materials about his income earned during 2019 and 2020. The CRA officer conducting the second review [Second Reviewer] reviewed all the Applicant's documents as well as his income and deductions from income for the 2019–2021 tax years.

[13] The Second Reviewer attempted to call the Applicant four times to request information about his income and circumstances. On the fifth attempt (June 3, 2024), the Second Reviewer spoke with the Applicant. She explained why he was found ineligible for both the CERB and CRB, confirmed his employment circumstances, inquired about his “other income” and self-employment income, referred him to the CRB eligibility criteria, and requested further information about his babysitting expenses. Specifically, the Second Reviewer requested personal bank statements from all of 2019 and January to October 2020 (“receipts of payment”),

a letter of employment, and “any additional documentation to support eligibility for CRB and CERB.”

[14] In response, the Applicant provided personal bank statements from September 10 to the end of December 2019 and from the beginning of January to October 9, 2020, as well as a letter from Sharon Bulger describing his employment.

[15] The Second Reviewer spoke with the Applicant again on June 24, 2024. She told the Applicant that the total receipts in the 12 months prior to the initial CRB application (October 14, 2020) was \$120, and the total receipts in the 12 months prior to the initial CERB application (April 6, 2020) was \$570. She inquired if the Applicant had any additional receipt of payment documents to correspond with the totals indicated in the joint account bank statements and emails, and he replied that he submitted all that he had.

[16] On July 3, 2024, the Second Reviewer telephoned the Applicant to request further information about his self-employment income from online activities. She left a voicemail message and requested a call-back by July 10, 2024. He never called back.

[17] On July 15, 2024, the Second Reviewer also found the Applicant was not eligible for either the CERB or CRB because he did not earn \$5,000 of employment or self-employment income in 2019, 2020, or in the 12 months prior to applying for the benefits.

[18] The CRA Notepad note from July 11, 2024, indicates that the Second Reviewer based her decision on the fact that the numbers did not match between the different types of documentation

(emails, joint bank statements, and personal bank statements), making her unable to determine the amount of income the Applicant received from his childcare services. She also noted that, since the Applicant failed to provide any documentation on his self-employment income that he said he made as a “Twitch streamer,” she could not use this income towards his total income calculation.

IV. Relevant Provisions

[19] Section 3 of the CRB Act governs eligibility for CRB:

Canada Recovery Benefits Act,
SC 2020, c 12, s 2

*Loi sur les prestations
canadiennes de relance
économique*, LC 2020, ch 12, art
2

Canada Recovery Benefit

Eligibility

3 (1) A person is eligible for a Canada recovery benefit for any two-week period falling within the period beginning on September 27, 2020, and ending on October 23, 2021, if

[...]

(d) in the case of an application made under section 4 in respect of a two-week period beginning in 2020, they had, for 2019 or in the 12-month period preceding the day on which they make the application, a total income of at least \$5,000 from the following sources:

Prestation canadienne de relance économique

Admissibilité

3 (1) Est admissible à la prestation canadienne de relance économique, à l’égard de toute période de deux semaines comprise dans la période commençant le 27 septembre 2020 et se terminant le 23 octobre 2021, la personne qui remplit les conditions suivantes :

[...]

d) dans le cas d’une demande présentée en vertu de l’article 4 à l’égard d’une période de deux semaines qui débute en 2020, ses revenus provenant des

- (i) employment,
- (ii) self-employment,
- (iii) benefits paid to the person under any of subsections 22(1), 23(1), 152.04(1) and 152.05(1) of the Employment Insurance Act,
- (iv) allowances, money or other benefits paid to the person under a provincial plan because of pregnancy or in respect of the care by the person of one or more of their newborn children or one or more children placed with them for the purpose of adoption, and
- (v) any other source of income that is prescribed by regulation;
- (e) in the case of an application made under section 4 by a person other than a person referred to in paragraph (e.1) in respect of a two-week period beginning in 2021, they had, for 2019 or for 2020 or in the 12-month period preceding the day on which they make the application, a total income of at least \$5,000 from the sources referred to in subparagraphs (d)(i) to (v);

[...]

sources ci-après, pour l'année 2019 ou au cours des douze mois précédant la date à laquelle elle présente sa demande, s'élevaient à au moins cinq mille dollars :

- (i) un emploi,
- (ii) un travail qu'elle exécute pour son compte,
- (iii) des prestations qui lui sont payées au titre de l'un des paragraphes 22(1), 23(1), 152.04(1) et 152.05(1) de la Loi sur l'assurance-emploi,
- (iv) des allocations, prestations ou autres sommes qui lui sont payées, en vertu d'un régime provincial, en cas de grossesse ou de soins à donner par elle à son ou ses nouveau-nés ou à un ou plusieurs enfants placés chez elle en vue de leur adoption,
- (v) une autre source de revenu prévue par règlement;

e) dans le cas d'une demande présentée en vertu de l'article 4, par une personne qui n'est pas visée à l'alinéa e.1), à l'égard d'une période de deux semaines qui débute en 2021, ses revenus provenant des sources mentionnées aux sous-alinéas d)(i) à (v) pour l'année 2019 ou 2020 ou au cours des douze mois précédant la date à laquelle elle présente sa demande s'élevaient à au moins cinq mille dollars;

[...]

[20] Sections 2 and 6(1) of the CERB Act govern eligibility for CERB:

Canada Emergency Response Benefit Act, SC 2020, c 5, s 8

Loi concernant l'prestation canadienne d'urgence, LC 2020, c 5, art 8

Definitions

2 The following definitions apply in this Act.

[...]

worker means a person who is at least 15 years of age, who is resident in Canada and who, for 2019 or in the 12-month period preceding the day on which they make an application under section 5, has a total income of at least \$5,000 — or, if another amount is fixed by regulation, of at least that amount — from the following sources:

- (a) employment;
- (b) self-employment;
- (c) benefits paid to the person under any of subsections 22(1), 23(1), 152.04(1) and 152.05(1) of the Employment Insurance Act; and
- (d) allowances, money or other benefits paid to the person under a provincial plan because of pregnancy or in respect of the care by the person of one or more of their newborn children or one or more children placed with them for the

Définitions

2 Les définitions qui suivent s'appliquent à la présente loi.

[...]

travailleur Personne âgée d'au moins quinze ans qui réside au Canada et dont les revenus — pour l'année 2019 ou au cours des douze mois précédant la date à laquelle elle présente une demande en vertu de l'article 5 — provenant des sources ci-après s'élèvent à au moins cinq mille dollars ou, si un autre montant est fixé par règlement, ce montant :

- a) un emploi;
- b) un travail qu'elle exécute pour son compte;
- c) des prestations qui lui sont payées au titre de l'un des paragraphes 22(1), 23(1), 152.04(1) et

purpose of adoption. (travailleur)

Eligibility

6 (1) A worker is eligible for an income support payment if

(a) the worker, whether employed or self-employed, ceases working for reasons related to COVID-19 for at least 14 consecutive days within the four-week period in respect of which they apply for the payment; and

(b) they do not receive, in respect of the consecutive days on which they have ceased working,

(i) subject to the regulations, income from employment or self-employment,

(ii) benefits, as defined in subsection 2(1) of the Employment Insurance Act, or an employment insurance emergency response benefit referred to in section 153.7 of that Act,

(iii) allowances, money or other benefits paid to the worker under a provincial plan because of pregnancy or in respect of the care by the worker of one or more of their newborn children or one or more children placed with them for the purpose of adoption, or

(iv) any other income that is prescribed by regulation.

152.05(1) de la Loi sur l'assurance-emploi;

d) des allocations, prestations ou autres sommes qui lui sont payées, en vertu d'un régime provincial, en cas de grossesse ou de soins à donner par elle à son ou ses nouveau-nés ou à un ou plusieurs enfants placés chez elle en vue de leur adoption. (worker)

Admissibilité

6 (1) Est admissible à l'allocation de soutien du revenu le travailleur qui remplit les conditions suivantes :

a) il cesse d'exercer son emploi — ou d'exécuter un travail pour son compte — pour des raisons liées à la COVID-19 pendant au moins quatorze jours consécutifs compris dans la période de quatre semaines pour laquelle il demande l'allocation;

b) il ne reçoit pas, pour les jours consécutifs pendant lesquels il cesse d'exercer son emploi ou d'exécuter un travail pour son compte :

(i) sous réserve des règlements, de revenus provenant d'un emploi ou d'un travail qu'il exécute pour son compte,

(ii) de prestations, au sens du paragraphe 2(1) de la Loi sur l'assurance-emploi, ou la prestation d'assurance-emploi d'urgence visée à l'article 153.7 de cette loi,

(iii) d'allocations, de prestations ou d'autres sommes qui lui sont payées, en vertu d'un régime provincial, en cas de grossesse ou de soins à donner par lui à son ou ses nouveau-nés ou à un ou plusieurs enfants placés chez lui en vue de leur adoption,

(iv) tout autre revenu prévu par règlement.

V. Issues

[21] This matter raises the following issues:

1. Were the Second Reviewer's decisions finding the Applicant ineligible for the Benefits procedurally fair?
2. Were the Second Reviewer's decisions finding the Applicant ineligible for the Benefits unreasonable?

[22] The Respondent also raises the preliminary issue of the admissibility of several exhibits included in the Applicant's affidavit.

VI. Preliminary Issue: The Admissibility of the New Evidence

A. *The Applicant's Submissions*

[23] The Applicant has attached to his affidavit several new documents to demonstrate his income that the Second Reviewer confirms in her Affidavit were not before her. These include:

1. Exhibit 1: 2019 Summary of Income
2. Exhibit 2: 12-month Summary of Income
3. Exhibit 3: 2020 Summary of Income
4. Exhibit 4: S. Bulger Affidavit
5. Exhibit 8: 2019 Notification from Skrill (Paysafe)
6. Exhibit 9: 2019-2020 Vendor Payment Notifications

B. *The Respondent's Submissions*

[24] The Respondent submits that Exhibits 1–4 and 8–9 are inadmissible, as they do not fall under any exception to the general rule that evidence that could have been placed before the administrative decision-maker, but was not, is not admissible before the reviewing court (*Bernard v Canada (Revenue Agency)*, 2015 FCA 263 at para 13 [*Bernard*]; *Association of Universities and Colleges of Canada v Canadian Copyright Licencing Agency (Access Copyright)*, 2012 FCA 22 at para 19 [*Access Copyright*]; *Aryan v Canada (Attorney General)*, 2022 FC 139 at para 42 [*Aryan*]).

[25] The Respondent submits that all the materials appear to have been available to the Applicant during the review process when he had multiple opportunities to provide them to

CRA, and none of the documents purport to show defects in the evidentiary record or highlight any procedural unfairness that occurred during the review process.

C. *Analysis*

[26] I agree with the Respondent that Exhibits 1–4 and 8–9 of the Affidavit of Matthew Philip William Bulger are inadmissible. These exhibits are simply documentation of the Applicant’s income that could have been submitted to the CRA during the first or second review, and do not address the Applicant’s procedural fairness arguments. As such, they do not fall under any recognized exception to the general bar on new evidence on judicial review, being (1) an affidavit providing background information to summarize the evidence relevant to the merits that was before the decision-maker, (2) an affidavit noting what cannot be found in the record, or (3) evidence relevant to an issue of natural justice, procedural fairness, improper purpose or fraud that could not have been placed before the administrative decision-maker and that does not interfere with the role of the administrative decision-maker as merits-decider (*Bernard* at paras 19–27; *Access Copyright* at para 20).

[27] Additionally, I note that Exhibits 6 and 13 of the Applicant’s Affidavit are not in the Certified Tribunal Record [CTR]. Further, the added text boxes in Exhibit 5 do not appear in the version of that document included in the CTR. As such, I will also disregard Exhibits 5, 6, and 13.

VII. Standard of Review

[28] The Applicant makes no submissions on the applicable standard of review.

[29] The Respondent submits, and I agree, that the applicable standard of review for the procedural fairness question is approximate to correctness review, asking whether the Applicant knew the case to be met and had a full and fair opportunity to respond (*Canadian Pacific Railway Company v Canada (Attorney General)*, 2018 FCA 69 at para 56).

[30] The Respondent submits, and I agree, that the applicable standard of review for the merits of the Decisions is reasonableness (*Wahba v Canada (Attorney General)*, 2024 FC 858 at para 20, citing *Canada (Minister of Citizenship and Immigration) v Vavilov*, 2019 SCC 65 [Vavilov] and *Aryan* at paras 15–16; *Latourell v Canada (Attorney General)*, 2024 FC 44 at para 18). Reasonableness review is deferential but robust, and requires the reasoning process and outcome of a decision to be transparent, intelligible and justified (*Vavilov* at paras 13, 99).

VIII. Arguments

A. *Were the Second Reviewer's Decisions Procedurally Fair?*

(1) The Applicant's Submissions

[31] The Applicant submits that, although the June 3, 2024, phone conversation with the Second Reviewer gave him more details about what documentation the CRA required, the Second Reviewer wrongly assumed that the Applicant would know the difference between an invoice and a receipt and that the figures on the invoices, receipts and bank statements should match. The Applicant also submits that it was clear that he was confused during that conversation, and he was only able to locate the required documents once he sought assistance for judicial review. He explains that much of his confusion during this process was due to

memory problems, depression and anxiety, as well as a learning disability that results in difficulty learning or comprehending arithmetic.

[32] The Applicant also submits that the Second Reviewer failed to ask him if he engaged in any barter transactions. He argues that she should have done so, as the CRA's instructions for confirming COVID-19 benefits eligibility list "Was the service a trade of goods between individuals?" as an element to consider for self-employed business owners. He submits that, because of this, he was not aware that he was required to include in income the value of the room and board he received in exchange for childcare services.

[33] The Applicant also submits that the Second Reviewer failed to make any notes whether she considered his sources of earnings to be valid businesses.

(2) The Respondent's Submissions

[34] The Respondent submits that the Applicant knew he was found ineligible because he did not meet the \$5,000 income threshold. He had multiple opportunities to address this issue during the review process, as he spoke with CRA officials three times and provided documents to verify his income. The Respondent submits therefore that the Applicant's submissions that he was unaware of what was required to be eligible are unsupported by the evidence.

[35] The Respondent further submits that CRA officials cannot ask about information not disclosed by taxpayers, and it is unclear if the Applicant declared the income from his online activities with CRA. Further, the Second Reviewer called the Applicant to ask about his Twitch

streaming and other income, but the Applicant never called back nor provided documentation about income from these activities.

[36] The Respondent also raises that there is no evidence that the Applicant disclosed his learning disability and other challenges with his memory and math skills to the CRA during the review process or requested accommodation, and that the CRA call notes demonstrate the Applicant was able to communicate with CRA officials, provide detailed answers to their questions, and engage with the review process.

[37] Finally, the Respondent submits that the Applicant's suggestion that the Second Reviewer should have explained each and every type of document that would have been helpful for him to qualify for the CERB or CRB as he was otherwise unaware of what was needed must be rejected. This is because ignorance of the law is no excuse for failing to meet the criteria imposed by the legislation, and the onus is on the claimant to inquire into the eligibility criteria for each benefit and to prove that these criteria have been met (*Roussel v Canada (Attorney General)*, 2024 FC 809 at para 37 [*Roussel*]).

(3) Analysis

[38] I agree with the Respondent that there was no breach of procedural fairness in this case. It is the applicant's responsibility to establish that they met the eligibility criteria for the Benefits and to submit sufficient and correct evidence (*Ntuer v Canada (Attorney General)*, 2022 FC 1596 at para 26; *Walker v Canada (Attorney General)*, 2022 FC 381 at para 55; *Lalonde v Canada (Revenue Agency)*, 2023 FC 41 at para 75; *Payette v Canada (Attorney General)*, 2023

FC 131 at para 35). The duty of procedural fairness owed in these circumstances is at the low end of the spectrum (*Severcan v Canada (Attorney General)*, 2025 FC 197 at para 43).

[39] While I am sympathetic to the Applicant's situation, it is the onus of the applicant to prove their eligibility, and it is no defence to not understand the eligibility requirements (*Roussel v Canada (Attorney General)*, 2024 FC 809 at para 37; *Preston v Canada (Attorney General)*, 2025 FC 135 at paras 38–39).

[40] The Second Reviewer was not required to inquire about all possible forms of income that the Applicant may have received. The list of questions the Applicant cites from the CRA's instructions for confirming COVID-19 benefits eligibility are not questions that CRA officers must pose to applicants, but rather are prompts for what they should consider when determining intention to operate a business.

[41] Additionally, the Applicant's argument that the Second Reviewer did not make clear to him that the figures on all the documents needed to match cannot be supported. Indeed, during the June 24, 2024, phone call, the Second Reviewer specifically told the Applicant that the numbers in his documentation did not line up and asked him if he had any additional receipt of payment documents to correspond with the totals indicated in the joint account bank statements and emails. He replied that he did not. The Second Reviewer made clear the case that the Applicant needed to meet and gave him the opportunity to respond.

[42] As for the Twitch streaming income, I agree with the Respondent that the Second Reviewer respected procedural fairness as she inquired about the income multiple times and gave the Applicant the opportunity to provide documentation.

[43] In conclusion, the Second Reviewer explained to the Applicant on multiple occasions why he was at risk to be found ineligible, explained the documentation that she required, and gave him multiple opportunities to provide further information. The Applicant's failure to provide sufficient proof of income in response to these opportunities does not mean that the process was procedurally unfair.

[44] I also agree with the Respondent that it appears that the Applicant was able to converse and understand the Second Reviewer's requests, and absent a request for accommodation owing to a disability, the Second Reviewer was not required to alter her process (in this connection, see *Ghukasyan v Canada (Attorney General)*, 2025 FC 140 at para 23; *Cameron v Canada (Attorney General)*, 2024 FC 2 at paras 34–35; *Caron v Canada (Attorney General)*, 2024 FC 1073 at paras 26–29; *Virani v Canada (Attorney General)*, 2023 FC 1741 at para 21).

B. *Were the Second Reviewer's Decisions Reasonable?*

(1) The Applicant's Submissions

[45] Aside from the above procedural fairness arguments that the Applicant suggests also render the Decisions unreasonable, the Applicant submits that the reasons for the Decisions were insufficient considering their harsh consequences (*Vavilov* at para 133).

(2) The Respondent's Submissions

[46] The Respondent argues that the Applicant has not pointed to any serious shortcomings or met his burden to demonstrate how the decisions at issue are unreasonable. Specifically, the Respondent submits that the Second Reviewer's case notes demonstrate that she took a careful review of all the documents provided by the Applicant and the information learned from two phone calls with him.

[47] The Respondent further submits that it was open to the Second Reviewer to determine the Applicant's eligibility for CERB and CRB was inconclusive based on the financial information before her at the time of the decision. Specifically, the babysitting payment documents and emails indicating hours worked for babysitting in the 12 months prior to his application for benefits totalled only \$2,306.50, the Second Reviewer could not distinguish which payments in the bank statements were income to the Applicant for babysitting, and the Applicant did not provide information about his self-employment income as a Twitch streamer.

(3) Analysis

[48] I agree with the Respondent that the Decisions were reasonable. The \$5,000 income requirement is a non-discretionary requirement for eligibility for both CRB and CERB, and CRA officers are required to apply it (*Flock v Canada (Attorney General)*, 2022 FC 305 at para 23). Without proof before her that the Applicant had made \$5,000 of income in the relevant time periods, it was reasonable for the Second Reviewer to find the Applicant ineligible for the Benefits.

[49] Turning to the Applicant's argument that the Decisions are unreasonable on the basis that the Second Reviewer failed to provide sufficient reasons, I disagree. The Applicant focuses solely on the letters he received from the CRA, however the Officer's reasons for the Decisions include the report of the second review and CRA Notepad entries (*Aryan* at para 22; *Sun v Canada (Attorney General)*, 2023 FC 1225 at para 23; *Kleiman v Canada (Attorney General)*, 2022 FC 762 at para 9). The letters indicate the reason for his ineligibility, and the Second Reviewer's CRA Notepad notes, particularly those of July 11, 2024, provide a detailed explanation for how that conclusion was reached. These reasons are sufficient and reasonable.

C. *Costs*

[50] With regards to the issue of costs, the Court has full discretionary power over the amount and allocation of costs, per Rule 400 of the *Federal Courts Rules*, SOR/98-106. As a general principle, the successful party is entitled to its costs (*Cozak v Canada (Attorney General)*, 2023 FC 1571 at para 30). In the case at bar, the Applicant is a self-represented litigant who appears to have brought this application simply for a consideration of his circumstances by the Court. In my view, this is not an appropriate case for costs.

IX. Conclusion

[51] This application for judicial review is dismissed because the Applicant has not demonstrated that the decisions under review were unreasonable or that there was a breach of procedural fairness.

[52] In concluding, I note the following passage from the decisions under review: *“We understand that it may not be possible for you to pay your debt immediately and in full. We're here to help. The CRA offers various solutions tailored to your personal situation.”*

[53] At the hearing into this matter, the Applicant explained that he was going through a difficult time during the pandemic and that he has learning disability and other challenges with his memory. The Applicant does not know how he will repay the CERB and CRB benefits that he received, and he fears having to declare bankruptcy. The Applicant also explained that he struggled to maintain his mental health during the pandemic and that his current state of mental health is fragile. Considering these circumstances, I expect the CRA to adhere to the above-quoted representation and exercise flexibility related to the quantum and/or timing of any repayments.

JUDGMENT in T-1832-24

THIS COURT'S JUDGMENT is that:

1. This application for judicial review is dismissed, without costs.

"L. Saint-Fleur"

Judge

FEDERAL COURT
SOLICITORS OF RECORD

DOCKET: T-1832-24

STYLE OF CAUSE: MATTHEW BULGER v ATTORNEY GENERAL OF CANADA

PLACE OF HEARING: OTTAWA (ONTARIO)

DATE OF HEARING: MAY 7, 2025

JUDGMENT AND REASONS: SAINT-FLEUR J.

DATED: MAY 27, 2025

APPEARANCES:

Matthew Bulger

FOR THE APPLICANT
(ON HIS OWN BEHALF)

Gabriel Caron

FOR THE RESPONDENT

SOLICITORS OF RECORD:

Attorney General of Canada
Ottawa (Ontario)

FOR THE RESPONDENT