

**IN THE SUPREME COURT OF CANADA  
(ON APPEAL FROM THE COURT OF APPEAL OF QUEBEC)**

**BETWEEN:**

**S.N.**

**APPLICANT  
(Applicant)**

**AND:**

**ROBERT GERALD MILLER  
and  
FUTURE ELECTRONICS INC.**

**RESPONDENTS  
(Respondents)**

**- and -**

**ALONIM INVESTMENTS INC.  
ROBMILCO HOLDINGS LTD.  
MULTIFORM PROPERTIES INC.  
4306805 CANADA INC.  
11172247 CANADA INC.  
RODNEY MILLER**

**IMPLEADED PARTIES  
(Impleaded Parties)**

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**APPLICANT'S REPLY TO THE RESPONDENTS' RESPONSE  
TO THE APPLICATION FOR LEAVE TO APPEAL  
(APPLICANT, S.N.)**

Pursuant to Rule 28 of the *Rules of the Supreme Court of Canada*

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**APPLICANT’S REPLY TO THE RESPONDENTS’ RESPONSE  
TO THE APPLICATION FOR LEAVE TO APPEAL**

1. The Applicant will be very concise in her reply.
2. Respondent Robert G. Miller, a billionaire,<sup>1</sup> is alleged by these proceedings to have paid approximately 50 underage adolescent girls for sex,<sup>2</sup> some as young as 11 years old.<sup>3</sup>
3. If proven true, which seems quite likely given the overwhelming evidence, this conduct is both criminal and civilly actionable. The harm inflicted on Respondent Miller’s alleged victims, who were children and teenagers at the time, is unthinkable; it is a near certainty that an impending judgment will condemn Respondent Miller to multiple millions of dollars in damages.
4. Defendant Miller is on the cusp of selling his globally-renowned corporation, Respondent Future Electronics Inc., headquartered in Montreal, to a Taiwanese company for US\$3.8 billion. The sale agreement has been signed; at any moment, the “required regulatory approvals”<sup>4</sup> will be obtained. This approval process includes the blessing of Innovation, Science and Economic Development Canada (ISED)<sup>5</sup> under section 14(1) of the *Investment Canada Act*, RSC 1985, c 28 (1st Supp) as is necessary because the transaction involves the transfer of ownership of a large Canadian-owned corporation to a foreign entity.
5. Once this sale is complete, which can happen at any moment,<sup>6</sup> there is absolutely no reason to believe that Respondent Miller will *choose* to direct the Taiwanese buyer to send any portion of the proceeds into a Canadian bank account. To the contrary, at this early stage of the proceeding (i.e. pre-certification of a class action) and without having conducted any discovery (as it is an interlocutory and safeguard measure), the evidence indicates that Respondent Miller has no

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<sup>1</sup> In 2023, Forbes listed his net worth as US\$1.9 billion, the 1,647 richest person in the world. Accessible at <https://www.forbes.com/profile/robert-g-miller/?sh=247f611f21c7>.

<sup>2</sup> In these proceedings, 47 women have filed Declarations (Exhibits R-17 to R-44 and R-51 to R-68) alleging that they were paid by Defendant Miller for sex when they were underage. In addition, there are 3 individual actions: *A.B. v. Robert Gerald Miller et al.*, S.C.M. 500-17-125100-233; *A.B. v. Robert Gerald Miller et al.*, 500-17-126739-237; and *C.D. v. Robert Gerald Miller et al.*, S.C.M. 500-17-127114-232.

<sup>3</sup> Madame 42 claims she was 11 years old when she first began having sex with Respondent Miller for money; Madame 45 claims she was 12 years old; and Madame 46 claims she was 12 years old.

<sup>4</sup> Exhibit MA-6, page 82 of the Application for Leave to Appeal.

<sup>5</sup> ISED is a department of the Government of Canada that is responsible for a number of the federal government’s functions in regulating industry and commerce, promoting science and innovation, and supporting economic development.

<sup>6</sup> And is expected “to close in the first half of 2024” (Exhibit MA-6, page 82 of the Application for Leave to Appeal).

intention whatsoever of facing the financial consequences of his illicit actions – he will run and he will hide; in fact, he may have already done so, given that the Applicant’s bailiff has been unable to locate him on numerous occasions over the past 10 months.

6. This concern is not just a hunch; it stems from serious allegations that Respondent Miller has acted as a ghost for years (with his real estate holdings being secretly owned by his attorneys under their names, acting as his *prête-nom*),<sup>7</sup> that he has taken deliberate actions to conceal valuable assets following legal action against him (such as transferring his \$9.5 million personal residence to his son for \$1), and that he has exhibited “prior persistent or characterized dishonest behaviour”.

7. In his Response Memorandum, Respondent Miller characterizes the Applicant’s Mareva Motion using the words “frivolous” and “vexatious”<sup>8</sup> – but nothing could be further from the truth.

8. What we are watching in real time is a failure of the judicial system to protect the vulnerable from the powerful, which is a fundamental tenet of justice. Victims of sexual abuse are deserving of the court’s protection; instead, they are experiencing the exact opposite.

9. If Respondent Miller succeeds in moving his billions of dollars out of sight and beyond the reach of a Canadian court’s jurisdiction to enforce its ruling – the whole in broad daylight and even with the approval of a federal government agency (ISED) – the words more befitting to this whole sordid affair will be “scandalous” and a “travesty”.

10. The Applicant implores this Honourable Supreme Court of Canada to act and to address the shortcomings of both the Quebec Superior Court and Court of Appeal.

**MONTREAL, March 13, 2024.**



CONSUMER LAW GROUP INC.

Per: Mtre Andrea Grass

**Counsel for the Applicant (Applicant)**

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<sup>7</sup> It was recently discovered during a hearing in the file *A.B. v. Robert Gerald Miller et al.*, S.C.M. 500-17-125100-233, that Respondent Miller does not hold, and has for decades not held, a personal bank account. Instead, Future Electronics deposits money into an RBC bank account held in the name of Sam Abrams, his former Executive Vice President of Future Electronics, and the money is used to pay expenses upon Respondent Miller’s instructions; <https://www.lapresse.ca/actualites/2024-03-08/allegations-d-abus-sexuel-contre-robert-miller/un-milliardaire-sans-compte-en-banque.php>.

<sup>8</sup> Para. 7 of Respondent Miller’s Response Memorandum.