

**THE CORNWALL
PUBLIC INQUIRY**



**L'ENQUÊTE PUBLIQUE
SUR CORNWALL**

Public Hearing

Audience publique

Commissioner

The Honourable Justice /
L'honorable juge
G. Normand Glaude

Commissaire

VOLUME 127

Held at :

Hearings Room
709 Cotton Mill Street
Cornwall, Ontario
K6H 7K7

Monday, August 20, 2007

Tenue à:

Salle des audiences
709, rue de la Fabrique
Cornwall, Ontario
K6H 7K7

Lundi, le 20 août 2007

Appearances/Comparutions

Ms. Julie Gauthier	Registrar
MR. Pierre R. Dumais	Commission Counsel
Mr. John E. Callaghan Mr. Mark Crane	Cornwall Police Service Board
Ms. Diane Lahaie	Ontario Provincial Police
Mr. David Rose M ^e Claude Rouleau	Ontario Ministry of Community and Correctional Services and Adult Community Corrections
Mr. Darrell Kloeze	Attorney General for Ontario
Mr. Peter Chisholm	The Children's Aid Society of the United Counties
Mr. Allan Manson	Citizens for Community Renewal
Mr. Dallas Lee	Victims Group
Mr. William Carroll	Ontario Provincial Police Association

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1 --- Upon commencing at 2:05 p.m./

2 L'audience débute à 14h05

3 **THE REGISTRAR:** Order; all rise. À l'ordre;
4 veuillez vous lever.

5 This hearing of the Cornwall Public Inquiry
6 is now in session. The Honourable Mr. Justice Normand
7 Glaude, Commissioner, presiding.

8 Please be seated. Veuillez vous asseoir.

9 **THE COMMISSIONER:** Thank you. Good
10 afternoon.

11 **MR. DUMAIS:** Good afternoon, Commissioner.

12 **THE COMMISSIONER:** Good afternoon, sir.

13 **MR. DUMAIS:** We do have the next witness
14 sitting in the witness chair, Commissioner, Mr. Keith
15 Ouellette. I understand he wishes to be affirmed.

16 **THE COMMISSIONER:** Thank you.

17 **KENNETH-KEITH OUELLETTE, Affirmed/Sous affirmation**
18 **solennelle:**

19 **THE COMMISSIONER:** Mr. Ouellette, how are
20 you doing today?

21 **MR. OUELLETTE:** I'm doing fine under the
22 circumstances.

23 **THE COMMISSIONER:** I understand that.

24 Could you maybe bring down the microphone
25 down lower?

1 **MR. OUELLETTE:** I'm sorry.

2 **THE COMMISSIONER:** There you go.

3 No, I just want to make sure that you
4 understand that you're going to be asked some questions
5 here today, and I want you to take your time and answer
6 with the best answer you can come up with.

7 If there's something you don't understand
8 with respect to the questions, just ask Maître Dumais and
9 he'll reformulate it for you. If you don't know the answer
10 to a question, it's okay to say "I don't know."

11 If at any time you don't feel comfortable,
12 there's something that you don't understand or you don't
13 feel quite at ease with, just ask me and we'll explain it
14 to you and then we'll see where we can go.

15 **MR. OUELLETTE:** Okay.

16 **THE COMMISSIONER:** How's that? Now, do you
17 have any questions?

18 **MR. OUELLETTE:** No, not really.

19 **THE COMMISSIONER:** Thank you.

20 Maître Dumais.

21 **--- EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN CHEF PAR MR.**
22 **DUMAIS:**

23 **MR. DUMAIS:** Hi, Keith.

24 **MR. OUELLETTE:** Hi.

25 **MR. DUMAIS:** So I'm just going to start

1 firstly by asking you a few questions about your family
2 history, if that's okay?

3 MR. OUELLETTE: Yes, it is.

4 MR. DUMAIS: All right, Keith.

5 So then I understand that you were born on
6 March 13th, 1954?

7 MR. OUELLETTE: Yes, I was.

8 MR. DUMAIS: And you were born in Ottawa?

9 MR. OUELLETTE: Yes, I was.

10 MR. DUMAIS: And you lived there for a
11 certain period of time; I believe approximately one year.
12 Is that right?

13 MR. OUELLETTE: Approximately.

14 MR. DUMAIS: Okay. And in Ottawa you were
15 living with your biological mother?

16 MR. OUELLETTE: Yes.

17 MR. DUMAIS: All right.

18 And in 1954, was there anyone else that was
19 part of this family?

20 MR. OUELLETTE: My biological father.

21 MR. DUMAIS: All right.

22 So your -- both your mother and father were
23 together?

24 MR. OUELLETTE: Yes, but my father was in
25 the military, so he was away.

1 **MR. DUMAIS:** Okay. And I understand that
2 from that union your biological parents have another child.
3 Is that right?

4 **MR. OUELLETTE:** Yes, I have a sister.

5 **MR. DUMAIS:** Okay. And would she be older
6 or younger than you?

7 **MR. OUELLETTE:** She's approximately one year
8 younger than I am.

9 **MR. DUMAIS:** Okay. So then at one point in
10 time you came to live with a lady called Rita Ouellette; is
11 that correct?

12 **MR. OUELLETTE:** Rita Ouellette, yes.

13 **MR. DUMAIS:** And you came to live with her
14 and her husband in Cornwall?

15 **MR. OUELLETTE:** Yes, I did.

16 **MR. DUMAIS:** And you were approximately one
17 year-old at that time?

18 **MR. OUELLETTE:** I -- they were my
19 neighbours, my biological parents' neighbours, from what
20 I'm told.

21 **MR. DUMAIS:** Okay. So then you believe that
22 she was -- Ms. Ouellette was your neighbour in Ottawa?

23 **MR. OUELLETTE:** No, in Cornwall, but she was
24 my babysitter while my mother worked while my father was
25 away in the military.

1 **MR. DUMAIS:** Okay. So were you at one point
2 then living in Cornwall with your biological parents?

3 **MR. OUELLETTE:** Could you repeat that
4 question, please?

5 **MR. DUMAIS:** Were you living in Cornwall
6 with your natural mother?

7 **MR. OUELLETTE:** In the beginning, yes.

8 **MR. DUMAIS:** Okay. So you were living --
9 you were neighbours to Rita Ouellette and then your parents
10 moved with you to Ottawa; correct?

11 **MR. OUELLETTE:** My parents -- biological
12 parents moved to Cornwall. My father was away and my
13 adoptive parents lived nearby or were neighbours and they
14 babysat me until they then eventually adopted me.

15 **MR. DUMAIS:** All right.

16 I'm sorry, I got that -- it's something I
17 got wrong.

18 So then when you were staying with --
19 started being babysat by Rita, your natural mother was
20 actually living next door. Is that fair?

21 **MR. OUELLETTE:** From what I understand, yes.

22 **MR. DUMAIS:** Okay. Now, I understand that
23 at one point in time, they came to adopt you. Is that
24 correct?

25 **MR. OUELLETTE:** Yes.

1 **MR. DUMAIS:** And you were -- how old were
2 you?

3 **MR. OUELLETTE:** Approximately four, four-
4 and-a-half years old.

5 **MR. DUMAIS:** Okay. But in actuality, you
6 were living with them from the time you were about one;
7 correct?

8 **MR. OUELLETTE:** Yes, off and on, primarily
9 on.

10 **MR. DUMAIS:** Okay. So then you moved in
11 with your new parents and I understand, Keith, that they
12 had two other children living there. Is that correct?

13 **MR. OUELLETTE:** Yes.

14 **MR. DUMAIS:** And who -- what are their names
15 and how old were they?

16 **MR. OUELLETTE:** Robert Joseph Ouellette and
17 Richard, middle name, don't know, Ouellette.

18 **MR. DUMAIS:** Okay. And I understand that
19 both of them were older than you; is that right?

20 **MR. OUELLETTE:** Yes, they were.

21 **MR. DUMAIS:** And how old -- how much older
22 than you were they?

23 **MR. OUELLETTE:** A four or five-year
24 difference between Robert and I -- I think it was four
25 years -- and a nine-year difference between Richard and I.

1 **MR. DUMAIS:** Okay. Now, I understand that
2 Richard still resides in Cornwall but that Robert has since
3 passed away; is that correct?

4 **MR. OUELLETTE:** Yes, it is.

5 **MR. DUMAIS:** And Robert would have passed
6 away in 1997; is that correct?

7 **MR. OUELLETTE:** I'm not sure of the date,
8 but yes. I don't remember dates that give me bad memories
9 too much.

10 **MR. DUMAIS:** Okay. So I understand, Keith,
11 that at one point in time in October of '97, you would have
12 given a statement to -- an audio statement to officers with
13 the Project Truth investigation. Do you recall that in
14 '97?

15 **MR. OUELLETTE:** From prison, yes.

16 **MR. DUMAIS:** Yes.

17 So with respect, if you have that date in
18 mind, do you think that Robert at that time was still
19 alive, or do you know?

20 **MR. OUELLETTE:** I'm not -- I'm not sure.

21 **MR. DUMAIS:** You're not sure. All right.

22 Now, I understand, Keith, that over the span
23 of your life you have been abused by a number of different
24 people, and those allegations have been made to different
25 people in institutions or otherwise. So we're just going

1 to try to go -- and I'm going to try to keep it
2 chronological so that it follows in time.

3 So the first allegation I want to speak to
4 you about is that you would have been abused by your
5 brother, your adoptive brother Richard?

6 **MR. OUELLETTE:** Yes.

7 **MR. DUMAIS:** Now, the -- I understand that
8 at one point in time, you would have told your mother that
9 you had been sexually abused by Richard; is that correct?

10 **MR. OUELLETTE:** I told my brother first,
11 then my mother. My brother prodded me to tell my mother,
12 and we approached her together, my middle brother Robert.

13 **MR. DUMAIS:** Okay. So that's a discussion
14 that you had with Robert. You told him that this was going
15 on with Richard?

16 **MR. OUELLETTE:** Yes.

17 **MR. DUMAIS:** Is it fair to say that he
18 thought it was a good idea to speak to your mother?

19 **MR. OUELLETTE:** Yes.

20 **MR. DUMAIS:** The suggestion came from him?

21 **MR. OUELLETTE:** Yes.

22 **MR. DUMAIS:** Okay. And so you both
23 approached your mother and told her about this?

24 **MR. OUELLETTE:** Yes.

25 **MR. DUMAIS:** Was your adoptive father

1 present for that meeting or that discussion?

2 MR. OUELLETTE: I don't believe so.

3 MR. DUMAIS: Okay.

4 MR. OUELLETTE: He was a hardworking person.

5 MR. DUMAIS: All right.

6 And what was -- what happened after you
7 disclosed the allegation to your mother?

8 MR. OUELLETTE: My brother was reprimanded
9 verbally and that was the extent of the reprimand.

10 MR. DUMAIS: All right.

11 So you're saying Richard was reprimanded?

12 MR. OUELLETTE: Verbally.

13 MR. DUMAIS: Okay.

14 MR. OUELLETTE: Warned not to do it again.

15 MR. DUMAIS: All right.

16 So that, Keith, you were told this or you
17 were present when this happened?

18 MR. OUELLETTE: I was told.

19 MR. DUMAIS: And you were told this by whom?

20 MR. OUELLETTE: My mother.

21 MR. DUMAIS: Okay. And the matter, was that
22 the extent of a discussion about any allegations involving
23 Richard with your mother?

24 MR. OUELLETTE: Pardon me?

25 MR. DUMAIS: So she dealt with it that day

1 or subsequent to your disclosure to her and it was never
2 spoken again with her?

3 **MR. OUELLETTE:** I might have mentioned it
4 another time. It's possible that I had mentioned it again
5 but afterward it was just forgotten and denied.

6 **MR. DUMAIS:** M'hm.

7 **MR. OUELLETTE:** And not discussed for the
8 sake of family honour.

9 **MR. DUMAIS:** All right.

10 As far as you know, she would never have
11 disclosed this to anyone, for example, from the local
12 police service or the local Children's Aid Society?

13 **MR. OUELLETTE:** I'm pretty sure she didn't.

14 **MR. DUMAIS:** Okay. Now, I understand as you
15 were growing up, Keith, that you would have attended
16 different schools. So the first school that you went to
17 was the Sainte-Thérèse Elementary School?

18 **MR. OUELLETTE:** Yes.

19 **MR. DUMAIS:** And the second would be the
20 Notre Dame Middle School?

21 **MR. OUELLETTE:** Yes.

22 **MR. DUMAIS:** And finally the third would be
23 the General Vanier High School?

24 **MR. OUELLETTE:** Yes.

25 **MR. DUMAIS:** And all of them are located

1 here in Cornwall?

2 MR. OUELLETTE: Yes, in the same area.

3 MR. DUMAIS: And I understand that initially
4 you did not graduate with your grade 12 diploma but
5 eventually you obtained some credits at a local college and
6 got the equivalent. Is that the case?

7 MR. OUELLETTE: Yes.

8 MR. DUMAIS: Okay. Now, I understand at one
9 point in time as well, and I believe the year was 1978, you
10 would have enrolled in the Fine Arts program at St.
11 Lawrence College.

12 MR. OUELLETTE: Yes, I did.

13 MR. DUMAIS: And you attended there for a
14 number of years?

15 MR. OUELLETTE: Yes.

16 MR. DUMAIS: Unfortunately, you did not
17 graduate from that program. Is that correct?

18 MR. OUELLETTE: It was aborted; annulled
19 suddenly, yes.

20 MR. DUMAIS: And what was the reason for
21 that?

22 MR. OUELLETTE: I was involved in a
23 conspiracy to traffic in LSD.

24 MR. DUMAIS: All right.

25 MR. OUELLETTE: Due to the fact that I

1 couldn't afford to purchase the equipment needed to
2 accomplish my course and OSAP wasn't coming in. So I
3 conspired with other people to manufacture LSD to make
4 enough money to pay for my course.

5 **MR. DUMAIS:** All right.

6 So there was a reason for doing it but you
7 got caught and charged?

8 **MR. OUELLETTE:** I had a change of heart and
9 I refused to do it afterwards.

10 **MR. DUMAIS:** Afterwards, all right. But I
11 mean at that time you were arrested and charged. Is that
12 correct?

13 **MR. OUELLETTE:** Yes.

14 **MR. DUMAIS:** And you went through the court
15 systems and my understanding is that as a result thereof
16 you were incarcerated. Is that correct?

17 **MR. OUELLETTE:** Yes.

18 **MR. DUMAIS:** All right. All this to say
19 that you did not complete your course. Is that right?

20 **MR. OUELLETTE:** Yes.

21 **MR. DUMAIS:** But I understand that at one
22 point in time you were released from custody and you took
23 up another course in art and technique -- hair design. Is
24 that correct?

25 **MR. OUELLETTE:** Yes.

1 **MR. DUMAIS:** And you graduated from that?

2 **MR. OUELLETTE:** M'hm, yes, I did.

3 **MR. DUMAIS:** And you worked as -- I just
4 want to make sure that I have got the right term, as a hair
5 stylist. Is that ---

6 **MR. OUELLETTE:** Hair designer.

7 **MR. DUMAIS:** Hair designer, sorry. So until
8 1989. Is that right?

9 **MR. OUELLETTE:** Yes.

10 **MR. DUMAIS:** All right. And then after that
11 you stopped working in the salon and became -- you started
12 receiving a disability pension.

13 **MR. OUELLETTE:** Yes.

14 **MR. DUMAIS:** All right.

15 Now, the next allegation I want to talk to
16 you about, Keith, is that you would have been sexually
17 abused by Ken Seguin.

18 **MR. OUELLETTE:** Yes.

19 **MR. DUMAIS:** Now, how did you first come in
20 contact with Mr. Seguin?

21 **MR. OUELLETTE:** During middle school I
22 failed, I think, grade 7 and grade 8 successively, like one
23 after the other. So I had to double up on both. That put
24 me behind a little bit. So by the time I hit high school I
25 was a little older than I should have been. But while I

1 was in the middle school, I had done -- I don't remember
2 what the offence was but I think it had something to do
3 with drugs and/or the clergy, like maybe stealing money
4 from the collection boxes.

5 **MR. DUMAIS:** I see.

6 **MR. OUELLETTE:** And so it was a minor thing
7 and I was very misguided and very troubled when I was
8 young. I came from a poor family so to support my drug
9 habit -- to deal with having been sexually molested I
10 turned to drugs to try to find an answer and subsequently
11 got in trouble and I ended up on probation. Judge
12 Fitzpatrick had put me on probation with Mr. Ken Seguin and
13 that's how I got -- I think it was 1969. I might be wrong.

14 **MR. DUMAIS:** And since you were born in '54
15 that would put you at around 15 or so?

16 **MR. OUELLETTE:** Approximately 15 and-a-
17 half.

18 **MR. DUMAIS:** And we do have your criminal
19 record, Keith. Unfortunately, we do not have any record of
20 any juvenile entries on your record.

21 How sure are you about that, that you would
22 have been less than 16 years old?

23 **(SHORT PAUSE/COURTE PAUSE)**

24 **MR. OUELLETTE:** There was a percentage, 75
25 to 95 percent.

1 **MR. DUMAIS:** Okay. So you're pretty sure
2 but there is a possibility that you would have been more
3 than 16?

4 **MR. OUELLETTE:** There is always a
5 possibility.

6 **MR. DUMAIS:** Okay, all right. Fair enough.
7 Now, I understand that you were convicted of
8 your first adult criminal offence and that would have been
9 in December of 1973 and you would have been approximately
10 19 years-old at that time and you were placed on probation
11 by the judge on that date. Do you recall that?

12 **MR. OUELLETTE:** I'm not sure if it was
13 probation or if I had been convicted and then given parole
14 but I know it ended up that I had Ken Seguin as a probation
15 officer afterward.

16 **MR. DUMAIS:** Okay. You were placed on
17 probation a number of different times, Keith, and you were
18 again placed on probation in -- well, in 1974 you were
19 sentenced to a period of incarceration in August of 1974
20 and then again in October of 1974. But while you were
21 being paroled, if I can put it that way, and during these
22 first terms of probation were you always being supervised
23 by Ken Seguin or was there another probation officer that
24 could have been involved?

25 **MR. OUELLETTE:** It's possible that there was

1 another probation officer that was involved. However, if
2 that would have been the case it would be because Ken
3 Seguin had taken a vacation or was otherwise unavailable at
4 the time.

5 I seem to recall there was another person
6 for a very brief period of time that was involved in my
7 case and I don't recall if even they were male or female.
8 But it didn't last more than a three-week period, I'm
9 positive of that.

10 MR. DUMAIS: All right.

11 MR. OUELLETTE: If even that took place.

12 MR. DUMAIS: So would it be fair to say then
13 that as a youth and as a young adult while you were either
14 paroled or on probation that Ken Seguin would have been
15 your probation officer. Is that fair?

16 MR. OUELLETTE: Is it safe to say?

17 MR. DUMAIS: Is it?

18 MR. OUELLETTE: Absolutely.

19 MR. DUMAIS: Okay. Now, I understand,
20 Keith, at different points in time while this abuse was
21 going that Mr. Seguin would have threatened you?

22 MR. OUELLETTE: Yes, he did.

23 MR. DUMAIS: All right. So in what way and
24 with what would he threaten you?

25 MR. OUELLETTE: Exposure to using drugs that

1 he paid for in the first place. For behaving, I guess not
2 up to standard to what the probation officers were
3 expecting from me behaviourally speaking at home. For lack
4 of looking for a job even if I seemed to give an effort, it
5 would go like unregarded. They didn't care. He didn't
6 care.

7 And anyway, he would like then also threaten
8 later if I didn't do sexual favours or let him perform
9 sexual harassment or favours for him that he would revoke
10 my probation and/or parole which would then put me in an
11 incarcerated position illegally but still ---

12 **MR. DUMAIS:** All right. So he did use that,
13 if I can use that word, he did use that threat to make you
14 comply. Is that right?

15 **MR. OUELLETTE:** He verbalized that if I
16 didn't give him fellatio, he didn't use the word
17 "fellatio". I don't want to get into detail about what he
18 said, but that I didn't give him fellatio and/or let him
19 fondle me and/or penetrate me, that he would absolutely
20 revoke my probation and/or parole at the time.

21 **MR. DUMAIS:** All right.

22 **MR. OUELLETTE:** Because there were several
23 times -- and sometimes again -- I would like to explain
24 that, sometimes I get mixed up because they resemble each
25 other so much that it's hard to keep track of which

1 occasion.

2 **MR. DUMAIS:** All right. Now I understand,
3 Keith, that at one point in time that Ken Seguin would have
4 suggested that it was a good idea for you to obtain
5 employment?

6 **MR. OUELLETTE:** Yes, he made it a point.

7 **MR. DUMAIS:** Pardon me?

8 **MR. OUELLETTE:** He made it a point.

9 **MR. DUMAIS:** All right. So why don't you
10 talk to us about that?

11 **MR. OUELLETTE:** There was one occasion,
12 well, one occasion that stands out very much and that is
13 basically responsible for why I have problems today, it's
14 because it resulted in my incarceration first. But what it
15 is is that it's that very time when he asked me to give him
16 fellatio and there was another time also when he brought me
17 near some place near the river and he asked me to ---

18 **MR. DUMAIS:** Actually, the details of the
19 abuse aren't -- is not ---

20 **MR. OUELLETTE:** Well, could you repeat the
21 question, please?

22 **MR. DUMAIS:** I understand that at one point
23 in time, Ken Seguin wanted you to find some employment. Is
24 that correct?

25 **MR. OUELLETTE:** Oh, I am sorry. I got

1 sidetracked. Yes. He put it to me this way. He said:
2 "I have to make it look good. I have
3 to make you look okay. I have
4 requirements -- probation requirements
5 that you have to abide by and I have to
6 account for you. So being that you're
7 not being cooperative . . ."

8 Because I was not being cooperative because
9 I was being resistant to his advances and I didn't trust
10 him anymore because by then he had made several advances
11 and I was very afraid of him.

12 But, at the same time, he had power over me,
13 a lot of power over me. He had my freedom over me and I
14 didn't want to do anything wrong. And so, he said:

15 "Well you have to go see, you know,
16 manpower and get a job."

17 And I had been everywhere in Cornwall
18 looking for a job. And I wasn't that educated at the time
19 and opportunity didn't knock; didn't know that many people;
20 didn't that many friends. So I decided I better go along
21 with this. So I ended up at 132 Second Street East which
22 is where Richard Hickerson was employed and I met him that
23 way. I was basically forced to go there. And if I
24 wouldn't have, he would have revoked my probation or found
25 reason to.

1 **MR. DUMAIS:** All right. And how was the
2 contact made? Were you made to call the Manpower office
3 and speak to someone?

4 **MR. OUELLETTE:** I'm sorry you'll have to
5 repeat that.

6 **MR. DUMAIS:** How was the appointment made
7 with someone from the Manpower office?

8 **MR. OUELLETTE:** Ken Seguin got on the office
9 phone. Nelson Barque, I only knew him as Nelson at the
10 time. I only found out about his name later. Nelson came
11 to the door. He introduced him as Nelson and he said:

12 "This is the guy who's going to give
13 you a ride to see Richard Hickerson."

14 I arrived to see Richard Hickerson. I was
15 greeted and put in a greeting room and immediately
16 introduced to him. And from that point on, after two or
17 three appointments in the afternoons, approximately from
18 three to anywhere from three to about six o'clock at night
19 -- my memory is not too clear on that about the time -- he
20 would then visit me at my home, my parents' home, after
21 work.

22 **THE COMMISSIONER:** And this is Mr.
23 Hickerson?

24 **MR. OUELLETTE:** Yes.

25 **THE COMMISSIONER:** M'hm.

1 **MR. OUELLETTE:** And he would have dinner
2 with us. And he would bring me to the Kraft cheese
3 processing factory, Iroquois, Montreal, basically same
4 places where Ken would bring me to.

5 **MR. DUMAIS:** And suffice it to say that
6 eventually you were sexually abused by Mr. Hickerson as
7 well?

8 **MR. OUELLETTE:** I was harassed by both men
9 for many years and assaulted by both men, Ken Seguin more
10 seriously. And Richard Hickerson attempted to rape me and
11 he weighed 180 pounds more than I did. It was hard to
12 fight off.

13 **MR. DUMAIS:** And Mr. Hickerson eventually
14 sexually abused you as well. Is that correct?

15 **MR. OUELLETTE:** Yes.

16 **MR. DUMAIS:** All right. Now, I just want to
17 back you up just a little bit.

18 You indicated that the transport, for lack
19 of a better word, between Ken Seguin's office and the
20 Manpower office was done by a gentleman by the name of
21 Nelson, that you knew as Nelson?

22 **MR. OUELLETTE:** Yes.

23 **MR. DUMAIS:** I just want to be clear. And
24 Nelson did not sexually abuse you?

25 **MR. OUELLETTE:** Not in any way; had no clue;

1 gave no indication of that sort of man or behaviour.

2 MR. DUMAIS: Okay. And that was your only
3 involvement with this gentleman named Nelson?

4 MR. OUELLETTE: I have no idea who he was.

5 MR. DUMAIS: Okay.

6 MR. OUELLETTE: Except that he was another
7 probation officer.

8 MR. DUMAIS: Okay. So you knew that much?

9 MR. OUELLETTE: I knew that much.

10 MR. DUMAIS: Okay. All right.

11 Now, I understand that at one point in time,
12 Keith, you were seeing a gentleman by the name of Doctor
13 Khan. Is that correct?

14 MR. OUELLETTE: Yes, it is.

15 MR. DUMAIS: And who was this gentleman and
16 how did you come to see him?

17 MR. OUELLETTE: He was one of the last
18 psychiatrists that I had seen after having gone on a very
19 long, wild goose chase of looking for help because there is
20 not an institution in the city that hasn't been contacted
21 by myself.

22 I acted out and everything just to make it a
23 point that they listen to me. I appeared even to be crazy
24 sometimes I suppose to the onlooker, but I made it a point
25 to try and get attention for my problem and for somebody to

1 listen to me. And I told him basically my whole story and
2 I tend to talk a lot because no one listens anyway. So I
3 talk loud and make sure that they hear me and I get in
4 their face, I admit that. But I do it for an intent.
5 People don't do that for nothing. So I told him everything
6 about myself but he couldn't write it all down in that
7 timeframe and even states so in that letter.

8 **MR. DUMAIS:** All right. So how did you get
9 to see Dr. Khan, do you know? Was he ---

10 **MR. OUELLETTE:** Well, I acted like I said.
11 I've seen everybody else in this town. And he was like
12 last resort.

13 **MR. DUMAIS:** But were you referred to him --
14 -

15 **MR. OUELLETTE:** By Dr. Manigat, I think, or
16 Dr. Laferriere.

17 **MR. DUMAIS:** Yes, and who is this gentleman?

18 **MR. OUELLETTE:** Dr. Laferriere was my family
19 physician, Gilles Laferriere.

20 **MR. DUMAIS:** Okay. All right.

21 So it is possible that he would have
22 referred you then to Dr. Khan? Does that make sense?

23 **MR. OUELLETTE:** I did ask for a referral
24 from Dr. Laferriere to see a professional regarding this.

25 **MR. DUMAIS:** Okay. So maybe this might help

1 you. I'm going to put a document to you, and that would be
2 Document Number 713809. Keith, the document is going to
3 come to you in two different forms. One, you can look at
4 it on your computer screen or ---

5 **MR. OUELLETTE:** It's blank.

6 **THE COMMISSIONER:** It will be there in a
7 minute.

8 **MR. OUELLETTE:** Oh.

9 **MR. DUMAIS:** --- and then a paper copy -- or
10 a paper copy will be given to you.

11 **MR. OUELLETTE:** I'm not very high tech.

12 **THE COMMISSIONER:** Neither am I.

13 **MR. DUMAIS:** Commissioner, I'm not sure what
14 exhibit we're at, but that would be the next ---

15 **THE COMMISSIONER:** Five-hundred-and-eighty
16 (580).

17 **MR. OUELLETTE:** Thank you.

18 **THE COMMISSIONER:** Now, is this something
19 that is a "P" exhibit?

20 **MR. DUMAIS:** No, that's fine, Commissioner.
21 Sorry, yes it is a "P" exhibit.

22 **THE COMMISSIONER:** All right. Thank you.
23 So Exhibit 580 is a letter addressed to Dr. Laferriere
24 dated December 8th, 1994 from Dr. Khan.

25 **MR. OUELLETTE:** M'hm.

1 --- EXHIBIT NO/PIÈCE NO. P-580:

2 (713809) Letter from Dr. A.G. Khan to Dr. G.
3 Laferriere dated December 8th, 1994 re: Keith
4 Ouellette

5 **MR. DUMAIS:** All right.

6 So if I can just bring you to one particular
7 paragraph, Keith. I'm looking at the first page, and it's
8 para -- it's the fourth paragraph, and I'm just going to
9 read you the relevant section and then I'm going to ask you
10 the question. So at about a third down:

11 "He stayed with them until he was 17
12 years old. At that place he felt he
13 was sexually abused by the adopting
14 brother who was older than him from the
15 age of six to nine years old. The
16 neighbours did tell his mother, but
17 nothing was done. He feels his sexual
18 abuse at that time has affected his
19 behaviour in the subsequent years."

20 So my first question is, the doctor appears
21 to refer to your previous evidence about your allegation
22 regarding Richard Ouellette. Is that fair?

23 **MR. OUELLETTE:** Yes. What I find curious is
24 that they said I just felt it.

25 **MR. DUMAIS:** All right.

1 So you don't -- you have no explanation for
2 that? You don't know why the doctor would have used that
3 term?

4 **MR. OUELLETTE:** Sure.

5 **MR. DUMAIS:** Do you think ---

6 **MR. OUELLETTE:** I do know.

7 **MR. DUMAIS:** Why is that?

8 **MR. OUELLETTE:** To keep it a secret.

9 **MR. DUMAIS:** All right.

10 So you believe that?

11 **MR. OUELLETTE:** I know it.

12 **MR. DUMAIS:** Okay. Now, the doctor does not
13 mention any allegations about anyone else. Do you think
14 that you only had a discussion about Richard with Dr. Khan?

15 **MR. OUELLETTE:** As I said before, I discuss
16 a lot of things really fast. At the time, being that I was
17 stressed out and not getting any help, had been everywhere,
18 I was very frustrated. I'm sure you can understand that.

19 After you've exhausted all possibilities,
20 you become increasingly frustrated with the system. I fell
21 through the cracks, had nowhere to go, reaching out for
22 help. No one seems to understand. No one believes you.
23 So sometimes you tend to speak too much or you slip up
24 because you're trying to explain yourself, and then they
25 cannot fully grasp what you're saying, so they write what

1 they possibly can understand. They're not all trained
2 stenographers. Therefore, they can't record everything you
3 said, but I'm sure I mentioned to almost every institution
4 in the city, no matter and regardless who they are, that I
5 had been molested by all of the men that I claimed to have
6 been molested by.

7 **MR. DUMAIS:** All right.

8 But obviously Dr. Khan only makes reference
9 to the allegation against Richard; right?

10 **MR. OUELLETTE:** Yes.

11 **MR. DUMAIS:** All right.

12 Now, the next question involves the second
13 part of that section there:

14 "The neighbour did tell his mother, but
15 nothing was done."

16 Do you know what he's referring to there?

17 **MR. OUELLETTE:** That triggers my memory.

18 I'm sure some of my relatives were informed because, you
19 know, some of the -- in those days, relatives -- families
20 stuck together. It wasn't like the nuclear family is
21 today; people party together and everything.

22 So people were a little bit closer than they
23 are now, and so I believe my aunt was told and I believe my
24 biological mother was told because my biological mother
25 left due to the reason that my biological sister was

1 molested. So she left. And, you know, like, people talk,
2 so they share that information, and people in the
3 neighbourhood, the mother of people who recently denied my
4 claims, like when they were asked to witness for me when I
5 accused my brother of molesting the neighbourhood ---

6 MR. DUMAIS: M'hm.

7 MR. OUELLETTE: --- well, those ---

8 MR. DUMAIS: Keith, I just want -- you're
9 testifying ---

10 MR. OUELLETTE: I'm sorry.

11 MR. DUMAIS: --- and I just want to make
12 sure that we stay on track here and that ---

13 MR. OUELLETTE: Well, some people were in
14 denial.

15 MR. DUMAIS: Fair enough.

16 But that we speak specifically about your
17 allegations. So ---

18 MR. OUELLETTE: My brother enlisted several
19 other people in the neighbourhood.

20 MR. DUMAIS: --- let me ---

21 MR. OUELLETTE: Some of the mothers found
22 out about that when they found their children committing
23 sexual acts amongst themselves. They were brothers and
24 sisters. They contacted my mother about it and my mother
25 settled the affair privately.

1 **MR. DUMAIS:** All right.

2 So you would have mentioned this then to Dr.
3 -- that came from you, I guess is what I'm asking?

4 **MR. OUELLETTE:** This information came from
5 me, yes.

6 **MR. DUMAIS:** All right.

7 **MR. OUELLETTE:** I'm sorry about that.

8 **THE COMMISSIONER:** No, no, that's fine.
9 That's fine.

10 **MR. DUMAIS:** And that report from Dr. Khan
11 is dated December of 1994; right?

12 **MR. OUELLETTE:** Yes.

13 **MR. DUMAIS:** And it appears to be a report
14 back to your family doctor?

15 **MR. OUELLETTE:** Yes.

16 **MR. DUMAIS:** Do you recall having any
17 discussion with respect to that with Dr. Laferriere?

18 **MR. OUELLETTE:** Do I recall having any
19 discussion with respect to this with Dr. Laferriere?

20 **MR. DUMAIS:** So Dr. Khan writes in his
21 report that you stated to him that -- he states to him that
22 you felt that you were sexually abused by the adopting
23 brother ---

24 **MR. OUELLETTE:** I resented the fact that
25 they -- he said that I just felt it.

1 MR. DUMAIS: Yes.

2 MR. OUELLETTE: And it made me seem like I
3 was mentally ill ---

4 MR. DUMAIS: Yes.

5 MR. OUELLETTE: --- when in reality an event
6 took place that he was in denial about reporting ---

7 MR. DUMAIS: I agree with ---

8 MR. OUELLETTE: --- to protect the interest
9 of whoever he was protecting.

10 MR. DUMAIS: Well, I agree with you.

11 I guess my question is only that this report
12 about an allegation went to Dr. Laferriere; right?

13 MR. OUELLETTE: Right.

14 MR. DUMAIS: And he was your family doctor?

15 MR. OUELLETTE: Yes.

16 MR. DUMAIS: And I guess when he received
17 this report, my question then is did he speak to you about
18 it? Did you have a specific discussion about this?

19 MR. OUELLETTE: Yes, I'm pretty sure I did,
20 several, and the reason why I had possession of this is
21 because I stole it.

22 MR. DUMAIS: You stole it from your ---

23 MR. OUELLETTE: Dr. Laferriere. Well, I
24 asked -- I didn't exactly steal it. I asked him to breach
25 ethics and give me a copy because it was important to prove

1 -- because if you read on, I wanted my kids. They took my
2 kids because of this.

3 **MR. DUMAIS:** All right.

4 So there's this whole issue going on in your
5 life with access to your kids. And I mean -- and we've had
6 this discussion before, Keith, and that's beyond the scope
7 of what we're doing here, but I'm particularly interested
8 in whether or not you had a specific discussion with Dr.
9 Laferriere about this ---

10 **MR. OUELLETTE:** I'm ---

11 **MR. DUMAIS:** Okay.

12 **MR. OUELLETTE:** --- not certain, but I'm
13 pretty sure.

14 **MR. DUMAIS:** Okay. So then you always had a
15 copy of this medical report with you?

16 **MR. OUELLETTE:** I acquired it.

17 **MR. DUMAIS:** Now, I understand as well --
18 and I'm going to take you to another document, and that's
19 document 737514.

20 **(SHORT PAUSE/COURTE PAUSE)**

21 **THE COMMISSIONER:** Thank you. Exhibit
22 Number 581 is a letter addressed to Kenneth-Keith Ouellette
23 dated November 9th, 1994 and that is from -- I don't know --
24 and to the Children's Aid Society.

25 **MR. DUMAIS:** So it's a letter written to the

1 Children's Aid Society of Cornwall.

2 THE COMMISSIONER: Right.

3 MR. DUMAIS: From ---

4 THE COMMISSIONER: Keith Ouellette.

5 MR. DUMAIS: Right.

6 THE COMMISSIONER: And it's Exhibit 581 and
7 again this is a public exhibit?

8 MR. DUMAIS: Yes, Mr. Commissioner.

9 THE COMMISSIONER: Thank you.

10 --- EXHIBIT NO./PIÈCE NO. P-581:

11 (737514) Letter from Keith Ouellette to
12 Children's Aid Society dated November 9th,
13 1994

14 MR. DUMAIS: Now, do you recognize that
15 letter, Keith?

16 MR. OUELLETTE: Oh, yes.

17 MR. DUMAIS: And it's a letter that you
18 wrote to the Children's Aid Society in '94. Is that
19 correct?

20 MR. OUELLETTE: Yes, it is my futile attempt
21 to get help.

22 MR. DUMAIS: Okay. And unfortunately the
23 last portion has been redacted. I don't recall for what
24 reason, Commissioner, but we don't see your signature
25 there. But that's -- you're right ---

1 **MR. OUELLETTE:** As I say, I was sick. I was
2 very ill at the time. After you go to an institution and
3 when you come out you're not the same man, especially if
4 you go in for refusing fellatio.

5 **MR. DUMAIS:** Right. I just want to talk to
6 you specifically about this letter.

7 So then you wrote this letter and how did --
8 and you gave it to the Children's Aid Society. Is that
9 correct?

10 **MR. OUELLETTE:** Yes. I hand delivered it.
11 I also mailed it.

12 **MR. DUMAIS:** Okay. So you did both, all
13 right.

14 And I just want -- and this had been written
15 with respect to your -- to assist you in attempting to gain
16 access to your children. Is that correct?

17 **MR. OUELLETTE:** And also to get help because
18 I had been to anger management, et cetera, detox.

19 **MR. DUMAIS:** So there was this whole thing
20 in 1994 that you were going through and you were trying to
21 get access to your kids? Is that ---

22 **MR. OUELLETTE:** I think -- yes, I think it
23 was, I had already lost access to my children.

24 **MR. DUMAIS:** All right.

25 So now the -- and I'm just looking at the

1 second paragraph which starts with the facts -- so fact:

2 "At the early age of five I was adopted
3 into a family through the CAS where
4 upon nine children of primarily boys
5 were sexually abused by a member of my
6 adopted family. I was one of those
7 nine boys. It is needless to say that
8 I was very traumatized and scared
9 permanently as a direct result of the
10 CAS' failure to grasp and deal
11 effectively with the situation at
12 hand."

13 So a number of different things here. So in
14 that paragraph you are making reference to the allegations
15 against Richard. Is that correct?

16 **MR. OUELLETTE:** Yes, I am.

17 **MR. DUMAIS:** All right. And now you're
18 saying "a result of the CAS failure to grasp and to deal
19 effectively with the situation at hand".

20 What are you referring to here?

21 **MR. OUELLETTE:** The failure of the CAS to
22 grasp the damage caused by sexual abuse at whatever age and
23 how it can affect a parent's ability to parent his children
24 properly and effectively and responsibly and morally and
25 ethically in a good way.

1 **MR. DUMAIS:** Okay, just ---

2 **MR. OUELLETTE:** And I was afraid that I was
3 losing it, so I was looking for help.

4 **MR. DUMAIS:** All right. So I just want to
5 make sure that we agree on something here.

6 At the time that the alleged abuse was
7 occurring at the hands of Richard, as far as you know the
8 Children's Aid Society were not aware of it?

9 **MR. OUELLETTE:** I had some form of visit
10 with a member of the Children's Aid Society soon after I
11 had approached my mother, my adoptive mother, with the
12 situation with my brother and I did have a visit with the
13 CAS. I do not recall the subject matter and I do, though,
14 recall that my mother told me to keep hush about what
15 happened at home so that ---

16 **MR. DUMAIS:** And you did, Keith?

17 **MR. OUELLETTE:** And I did because I didn't
18 want to lose face and honour for my family.

19 **MR. DUMAIS:** So the answer is "no" then?

20 **MR. OUELLETTE:** Well, I did have dealings
21 with them but the answer is basically "no", yes.

22 **MR. DUMAIS:** All right.

23 And I know that in 1994 you were involved in
24 a legal proceeding with respect to your children, but did
25 it ever come up or did anyone ever ask you any question

1 about that statement, that first paragraph about the ---

2 **MR. OUELLETTE:** No. In fact -- in fact, I
3 was obstructed in any way, shape or form and evidence was
4 always not admissible for some reason. My mental
5 condition, my health; my efforts to find help were never
6 taken into consideration. In fact, the opposite was done.
7 I was hunted like an animal.

8 **MR. DUMAIS:** So no one ever spoke to you
9 about that?

10 **MR. OUELLETTE:** No, not concretely and in a
11 positive manner, no. If they did speak about it, it was to
12 taunt me and to torture me and to punish me.

13 **MR. DUMAIS:** And again -- I mean, so no one
14 spoke to you?

15 **MR. OUELLETTE:** Not that I'm aware of.

16 **MR. DUMAIS:** All right.

17 Now, I understand that at one point in time
18 as well, Keith, you would have disclosed allegations of
19 abuse to the Cornwall Police Services?

20 **MR. OUELLETTE:** Many times.

21 **MR. DUMAIS:** And the first time you would
22 have done so, do you recall when that was, approximately?

23 **MR. OUELLETTE:** I believe the late '70s or
24 early '80s but give or take a couple of years.

25 **MR. DUMAIS:** All right. And what -- I'm

1 just trying to get a grasp on what the situation was. So
2 you weren't under arrest or ---

3 **MR. OUELLETTE:** No. Well, it depends what
4 year you're talking about.

5 **THE COMMISSIONER:** From the first time you
6 disclosed to a police officer.

7 **MR. OUELLETTE:** To a police officer?

8 **MR. DUMAIS:** To someone from Cornwall Police
9 Services?

10 **MR. OUELLETTE:** M'hm, I think it was a
11 sergeant the first time I spoke to anybody. I think it was
12 a constable the first time I spoke to anybody, a constable
13 on patrol.

14 **MR. DUMAIS:** All right.

15 So you would what, just mention this; struck
16 up a conversation with him and mention this?

17 **MR. OUELLETTE:** Yes, I knew him from school.

18 **MR. DUMAIS:** Okay. Now, did that lead to
19 you going to the actual building?

20 **MR. OUELLETTE:** No, it was a friend of mine.
21 Her name was Francine Gobeil. She was an ex-CAS worker and
22 a social worker and I was fresh out of Millbrook and OCI in
23 Guelph and they had transferred me all over the place. But
24 I was essentially out of OCI at the end and took a train to
25 Cornwall where I subsequently tried to get a job and met

1 Francine Gobeil and I disclosed to her, who told me I
2 should approach the authorities.

3 MR. DUMAIS: Okay.

4 MR. OUELLETTE: Which I did in short order.

5 MR. DUMAIS: So then you went to Cornwall
6 Police Services?

7 MR. OUELLETTE: Yes, I did.

8 MR. DUMAIS: And you spoke to someone?

9 MR. OUELLETTE: I spoke to a sergeant first.

10 MR. DUMAIS: Yes.

11 MR. OUELLETTE: And then I spoke to -- I
12 made an appointment to speak with the chief of police.

13 MR. DUMAIS: Yes.

14 MR. OUELLETTE: And then I got to meet with
15 the chief of police. Then I got to meet -- I made another
16 appointment but by then it was another chief of police and
17 then he told me he was going to get back to me, and the
18 next thing I knew I was working at Generac and about two,
19 three months after that initial interview, I made a phone
20 call to make another appointment and that appointment was
21 refused and ---

22 MR. DUMAIS: All right.

23 Let's deal with the first part.

24 MR. OUELLETTE: Sorry.

25 MR. DUMAIS: That's okay.

1 So then you go over there and you meet with
2 someone you believe to be the chief of police. Is that
3 correct?

4 **MR. OUELLETTE:** He was introduced to me as
5 the chief of police by his secretary.

6 **MR. DUMAIS:** Okay. So you don't actually
7 know his or her name?

8 **MR. OUELLETTE:** At the time, no.

9 **MR. DUMAIS:** Okay. And ---

10 **THE COMMISSIONER:** Well, at the time "no".
11 Do you now know who you think you spoke to?

12 **MR. OUELLETTE:** Well, because of the
13 newspapers, you know, and about the dates they kind of ID'd
14 him but I wasn't like political. I didn't read newspapers
15 back then. I was a street urchin basically, so I didn't
16 keep up on the news. I didn't know who was who by name.
17 Everybody was "Hey, man" in those days. Nobody knew
18 anybody's name, you know, if that's fair to say.

19 **MR. DUMAIS:** Okay. So you get to Cornwall
20 Police Services and you speak to a gentleman. Is that ---

21 **MR. OUELLETTE:** I speak to a gentleman that
22 had glasses, a heavy moustache, balding hair, pretty fat,
23 aggressive looking with a slight French accent.

24 **MR. DUMAIS:** Okay. So is that the first or
25 second time?

1 **MR. OUELLETTE:** That was the first time.

2 **MR. DUMAIS:** Okay. So the person you
3 describe is someone you spoke to the first time when you
4 initially went there?

5 **MR. OUELLETTE:** Yes.

6 **MR. DUMAIS:** All right. And you had told
7 him about allegations of sexual abuse?

8 **MR. OUELLETTE:** Yes.

9 **MR. DUMAIS:** All right. And what was that,
10 he just heard you out and said he would look into it?

11 **MR. OUELLETTE:** He said he would get back to
12 me.

13 **MR. DUMAIS:** Okay. And I take it that
14 person did not get back to you?

15 **MR. OUELLETTE:** No way.

16 **MR. DUMAIS:** And when this person took down
17 the information from you -- you have no complaint about
18 that?

19 **MR. OUELLETTE:** Pardon me?

20 **MR. DUMAIS:** You have no complaint about the
21 meeting?

22 **MR. OUELLETTE:** Well, the fact that he
23 didn't get back to me kind of irritated me but other than
24 that ---

25 **MR. DUMAIS:** So that's ---

1 **MR. OUELLETTE:** --- he seemed polite enough.

2 **MR. DUMAIS:** Okay. So that's a complaint
3 that he didn't get back to you.

4 So you had to make a second appointment. Is
5 that right?

6 **MR. OUELLETTE:** Yes.

7 **MR. DUMAIS:** And then during that second
8 appointment did you meet with the same person or was it
9 someone else?

10 **MR. OUELLETTE:** No, it was someone else.

11 **MR. DUMAIS:** Okay. So you meet then with
12 someone else and that's someone ---

13 **MR. OUELLETTE:** Who claimed to be the chief
14 of police.

15 **MR. DUMAIS:** Okay. And again, you think you
16 were seeing the chief of police?

17 **MR. OUELLETTE:** Again, yes.

18 **MR. DUMAIS:** All right.

19 And so what happens then, do you tell the
20 same story, do you repeat the story?

21 **MR. OUELLETTE:** Yes, and I added a few names
22 because I had forgotten that there were other people that
23 had -- they did not accost me but they had harassed me.

24 **MR. DUMAIS:** Okay.

25 **MR. OUELLETTE:** And I thought it would be

1 important that people would know that there were other
2 people other than the people who actually assaulted me.

3 **MR. DUMAIS:** All right.

4 So then -- and then what happens after that
5 meeting, you ---

6 **MR. OUELLETTE:** Approximately like attempted
7 to get more information. I made a phone call for another
8 meeting and it was refused; didn't have time. So I thought
9 that was strange because I mean he could have given me an
10 appointment for a later date and that got me thinking, you
11 know. So I just left it at that. And I had acquired a job
12 by then at Generac Management and I was a painter for
13 apartments and ---

14 **MR. DUMAIS:** Do you recall when you were
15 working there, Keith?

16 **MR. OUELLETTE:** Oh, mid-'80s, approximately.

17 **MR. DUMAIS:** Okay.

18 **MR. OUELLETTE:** Approximately.

19 Anyway, I was approached by two officers
20 minimum and I was brought to the dike. Then I was brought
21 to interview room number two where a desk similar to this
22 desk, only lower, made out of oak, was pushed up against me
23 and pinned my legs up against the wall and my life was
24 threatened. I was told that if I ever opened my mouth
25 again about Ken Seguin, Richard Hickerson and a few other

1 people that I would have two bullets put in my brain.

2 MR. DUMAIS: All right.

3 So then you're indicating that you would
4 have been threatened to shut up about these allegations?

5 MR. OUELLETTE: Directly.

6 MR. DUMAIS: All right.

7 And that would have been sometime in the
8 mid-'80s. Is that fair?

9 MR. OUELLETTE: Yes.

10 MR. DUMAIS: Because at that time you were
11 working at -- sorry, were you calling it Generac?

12 MR. DUMAIS: Sorry?

13 MR. OUELLETTE: Generac.

14 MR. DUMAIS: Generac.

15 MR. OUELLETTE: I was self-employed as a
16 painter.

17 MR. DUMAIS: Okay.

18 MR. OUELLETTE: Working a little bit
19 everywhere.

20 MR. DUMAIS: So you were working there?

21 MR. OUELLETTE: M'hm.

22 MR. DUMAIS: And they picked you up from
23 work. Is that right?

24 MR. OUELLETTE: Yes, at work.

25 MR. DUMAIS: All right, and then brought you

1 to the station. What happened afterwards?

2 **MR. OUELLETTE:** They brought me to the dike.
3 They brought me to the station interview room number two.
4 They threatened me and I walked back to work only to then
5 subsequently at some point -- I'm not too sure how much
6 time elapsed between the time that happened and the time
7 that I was let go. And apparently, I'm told, that the
8 person who let me go doesn't even remember the incident,
9 and I resent that.

10 **THE COMMISSIONER:** What's the dike? What's
11 a dike? You went to a dike?

12 **MR. OUELLETTE:** A dike, the dike, Robert
13 Saunders power dam.

14 **THE COMMISSIONER:** Okay.

15 **MR. OUELLETTE:** It's an isolated area.

16 **THE COMMISSIONER:** M'hm.

17 **MR. OUELLETTE:** At the time it wasn't as
18 public as it is now. It wasn't as developed and there were
19 a lot of dark dirt roads and a lot of bush. You could
20 easily hide cars there. There were two cars, two police
21 cars met. The car I was in met with another police car.
22 The people got out. They talked to each other. They
23 talked on their little handset phones because they didn't
24 have these other phones at the time and then I overheard a
25 kind of muffled "Should we do him here?" and then somebody

1 says "No, we got to bring him in", something to that
2 effect, and then I ended up at the station.

3 **MR. DUMAIS:** And while you were at the
4 police station, were you asked any questions about any
5 charges or any conduct of yours?

6 **MR. OUELLETTE:** Yes, I was -- I think
7 basically it was because I also had, as I said, another
8 painting job. I was working where Jenna's Restaurant is
9 right, which is right across from the old probation office,
10 502 Pitt. It was called Pegasus Restaurant at the time and
11 I was painting a sign for Pegasus Restaurant.

12 There was a project of the OPP undercover
13 thing for a drug squad thing happening and I knew some
14 disreputable people so that dealt in drugs and stuff. I
15 wasn't really a drug dealer but I liked to be helpful so I
16 acquired some drugs for this undercover officer and
17 attempted to acquire a firearm. And I admit that, but it
18 was basically not to cause harm but to defend myself
19 because I had reported this thing about Ken Seguin and
20 Richard Hickerson to the chief of police and nothing had
21 been done. I felt very threatened. I felt like my life
22 was becoming endangered and I just wanted to feel a little
23 more secure.

24 And as a consequence of asking to purchase
25 or -- and I was actually entrapped into talking about this

1 because I didn't even want to go there in the first place,
2 but they were undercover officers and what they do is they
3 entice you to speak about these things. That's what their
4 job is. So through trickery and other means, they
5 eventually got me to cooperate and get them seven grams of
6 hash for which I got busted for. Never did get the weapon,
7 didn't really want it. Again, a change of heart because
8 I'm not about ---

9 **MR. DUMAIS:** So Keith, if I understand this
10 then, during that same period of time when they picked you
11 up from work and drove you to the dike ---

12 **MR. OUELLETTE:** There was an investigation
13 going on.

14 **MR. DUMAIS:** There was an ongoing
15 investigation, and the allegation was that you had
16 purchased drugs from an undercover officer; is that
17 correct?

18 **MR. OUELLETTE:** No, the other way around; I
19 sold it to him.

20 **MR. DUMAIS:** Okay. Oh, sorry. So you sold
21 drugs to an undercover officer?

22 **MR. OUELLETTE:** Yes.

23 **MR. DUMAIS:** All right.

24 So you were being picked up ---

25 **MR. OUELLETTE:** For that.

1 MR. DUMAIS: --- for that?

2 MR. OUELLETTE: Too.

3 MR. DUMAIS: Pardon me?

4 MR. OUELLETTE: As well, yes, not at the
5 time that they were threatening me. That's prior to being
6 threatened.

7 MR. DUMAIS: Okay. So they're not -- these
8 events did not occur on the same day or the same night?

9 MR. OUELLETTE: No.

10 MR. DUMAIS: They're two separate days?

11 MR. OUELLETTE: There's two separate
12 occasions and events.

13 MR. DUMAIS: And do you know for sure now if
14 one came before the other?

15 MR. OUELLETTE: Yes.

16 MR. DUMAIS: Which one?

17 MR. OUELLETTE: It happened in this order.
18 They came into the restaurant. They had a conversation --
19 they enticed me and induced me to have a conversation with
20 them; invited me to the table. I took my break, my coffee
21 break.

22 MR. DUMAIS: But I mean, the details of the
23 purchase really, Keith -- I mean, I'm not -- sorry, maybe I
24 was not clear with my question. I didn't want to know the
25 chronological order of the fact of the offence. I mean, I

1 guess what I want to know is when they picked you up for
2 that drug transaction and when they ---

3 **MR. OUELLETTE:** It was after they had
4 already threatened me.

5 **MR. DUMAIS:** Okay. So that happened. They
6 let you go from the police station?

7 **MR. OUELLETTE:** I sold it to him, and then I
8 was threatened. Then they picked me -- they arrested me
9 for the seven grams about two months later, after I had
10 already been threatened.

11 **MR. DUMAIS:** Okay.

12 **THE COMMISSIONER:** It might be time for a
13 break?

14 **MR. DUMAIS:** Yes, perhaps, Commissioner.

15 **THE COMMISSIONER:** All right, sir, we'll
16 take the afternoon break. You're not to discuss any of
17 your testimony with anyone. If anyone tries to talk to you
18 about your testimony, you're to advise me or Mr. Dumais
19 immediately. All right?

20 **MR. OUELLETTE:** Okay.

21 **THE COMMISSIONER:** Thank you.

22 Let's take the afternoon break.

23 **THE REGISTRAR:** Order; all rise. À l'ordre;
24 veuillez vous lever.

25 --- Upon recessing at 3:07 p.m./

1 L'audience est suspendue à 15h07

2 --- Upon resuming at 3:26 p.m./

3 L'audience est reprise à 15h26

4 **THE REGISTRAR:** The hearing is now resumed.
5 Please be seated. Veuillez vous asseoir.

6 **KEITH OUELLETTE, Resumed/Sous le même serment:**

7 **MR. DUMAIS:** Thank you, and your indulgence
8 for a minute, Keith and Commissioner. I just need to ask a
9 question to counsel for a party.

10 **THE COMMISSIONER:** Thank you.

11 **(SHORT PAUSE/COURTE PAUSE)**

12 **MR. DUMAIS:** There is some -- I was asking
13 one question about perhaps a confidentiality measure that
14 might have to be put in place, but it's fine, Commissioner.

15 **THE COMMISSIONER:** Thank you.

16 **MR. DUMAIS:** And now, Keith, I understand
17 that these events occurred and you did not make a formal
18 complaint at that time. Is that right?

19 **MR. OUELLETTE:** Which events are you
20 referring to?

21 **MR. DUMAIS:** First of all, that you would
22 have reported allegations of sexual abuse to the chief at
23 Cornwall Police, firstly, and then that you would have been
24 threatened to keep quiet by two Cornwall police officers?

25 **MR. OUELLETTE:** Until I approached the

1 police again.

2 MR. DUMAIS: So again ---

3 MR. OUELLETTE: Until that time came, no.

4 And the only reason why I did is because I felt empowered
5 by the OPP Project Truth thing.

6 MR. DUMAIS: Okay. So at that time, you did
7 not mention this to any officials, if I can put it that
8 way?

9 MR. OUELLETTE: Off hand, off the record, at
10 various times, private people, yes. But only to -- in case
11 something would happen to me.

12 MR. DUMAIS: All right, but the -- I guess
13 you made a ---

14 MR. OUELLETTE: But a formal one, no.

15 MR. DUMAIS: Okay. You made a formal -- the
16 first time, you made a formal complaint about these events
17 was to a Project Truth officer. Is that fair?

18 MR. OUELLETTE: I am pretty sure it was a
19 Project Truth officer that I approached this matter with.

20 MR. DUMAIS: All right.

21 MR. OUELLETTE: Yes.

22 MR. DUMAIS: And I mean were -- I'm going to
23 jump a bit, just for the sake of keeping on topic.

24 But in 1997, you made a statement to Project
25 Truth about your -- about different allegations of sexual

1 abuse you had suffered; right?

2 MR. OUELLETTE: Yes.

3 MR. DUMAIS: And at the same time, you would
4 have mentioned to them these events, this instance that we
5 just talked about?

6 MR. OUELLETTE: Yes.

7 MR. DUMAIS: Now, Project Truth turned
8 around and told Cornwall police that you had made this
9 complaint?

10 MR. OUELLETTE: Yes.

11 MR. DUMAIS: And then Cornwall police met
12 with you. Is that fair?

13 MR. OUELLETTE: Yes. I also filed a
14 complaint with the Criminal Injuries Compensation Board.

15 MR. DUMAIS: Yes, and that's a separate
16 issue and I'll deal with that a little later on.

17 MR. OUELLETTE: M'hm.

18 MR. DUMAIS: But there was this specific
19 complaint that was given to Project Truth, referred back to
20 Cornwall Police Services and they contacted you, and I
21 believe it was Staff Sergeant Durocher that met with you.
22 Does that make sense?

23 MR. OUELLETTE: It's possible that's who it
24 was.

25 MR. DUMAIS: Okay. So you met with someone;

1 you don't necessarily recall the name?

2 **MR. OUELLETTE:** I don't recall the name.

3 **MR. DUMAIS:** Okay. And they told you that
4 they would conduct an audit or investigate this matter. Is
5 that fair?

6 **MR. OUELLETTE:** Yes, they assured me that
7 they would.

8 **MR. DUMAIS:** Okay. And as far as you know,
9 or do you know whether or not they conducted this internal
10 investigation?

11 **MR. OUELLETTE:** I received documentation to
12 that effect, yes.

13 **MR. DUMAIS:** Okay. So at one point in time,
14 you received a letter saying "Okay, we're doing this
15 investigation". And at another point in time, you received
16 a copy of the investigative reports with their findings.
17 Is that ---

18 **MR. OUELLETTE:** Yes.

19 **MR. DUMAIS:** And do you recall what those
20 findings were?

21 **MR. OUELLETTE:** That basically that they
22 couldn't really find any evidence and that most of the
23 evidence pointed to the contrary and -- or that's basically
24 how they treated it; that it wasn't validated.

25 **MR. DUMAIS:** And perhaps, Commissioner, we

1 should file a copy of the report.

2 **THE COMMISSIONER:** M'hm.

3 **MR. DUMAIS:** And that would be document
4 number 736897. And, Keith, once the document is put ---

5 **MR. OUELLETTE:** Thank you.

6 **THE COMMISSIONER:** Exhibit 582 is an
7 interoffice memo to Chief A. Repa from Sgt. Brian Snyder
8 dated February 6th, 2000.

9 ---EXHIBIT NO./PIÈCE NO P-582:

10 (736897) Memo from Sgt. Brian Snyder to
11 Chief A. Repa re: Keith Ouellette's
12 Complaint dated February 6th, 2000

13 **MR. DUMAIS:** So if you can just take a few
14 minutes, Keith, and have a look at the report and see if
15 you recognize that, and the report appears to be signed by
16 Sergeant Brian Snyder?

17 **MR. OUELLETTE:** Yes, I remember this
18 document.

19 **MR. DUMAIS:** Okay. So you did receive a
20 copy of that?

21 **MR. OUELLETTE:** Yes, I did.

22 **MR. DUMAIS:** And once you received the
23 report, did you do anything or was that the extent of your
24 involvement with your complaint?

25 **MR. OUELLETTE:** I complained again to the

1 OPP that this was just some form of cover-up or method of
2 protecting themselves from my accusation.

3 MR. DUMAIS: Okay. And you told the Project
4 Truth officers that much?

5 MR. OUELLETTE: Yes.

6 MR. DUMAIS: All right. And so you then
7 took note of the investigation they conducted, but you did
8 not accept their findings. Is that fair?

9 MR. OUELLETTE: Yes.

10 MR. DUMAIS: All right.

11 Now, I just want to take you just a little
12 bit back in 1997.

13 At one point in time, you were arrested and
14 in custody and you would have met a probation officer whose
15 job it was to prepare a pre-sentence report?

16 MR. OUELLETTE: I met a probation officer.

17 MR. DUMAIS: And that would have been in
18 October of 1997?

19 MR. OUELLETTE: The date I am not too sure.

20 MR. DUMAIS: Okay, fair enough.

21 MR. OUELLETTE: I was incarcerated at the
22 time.

23 MR. DUMAIS: Okay. And you were
24 incarcerated on a charge of threatening. Is that right?

25 MR. OUELLETTE: For which I was exonerated

1 for, yes.

2 MR. DUMAIS: Yes. And you met with this
3 probation officer which was Jos van Diepen. Is that ---

4 MR. OUELLETTE: I am not sure of his first
5 name but his last name, yes.

6 MR. DUMAIS: Was?

7 MR. OUELLETTE: van Diepen.

8 MR. DUMAIS: All right. And he met with you
9 while you were incarcerated. Do you recall where, which
10 jail you were at?

11 MR. OUELLETTE: The County Jail.

12 MR. DUMAIS: Okay. And where is that
13 located? In Cornwall?

14 MR. OUELLETTE: I believe the address is 7
15 Water Street.

16 MR. DUMAIS: And that's in Cornwall?

17 MR. OUELLETTE: Yes, it is.

18 MR. DUMAIS: Okay. And he met with you, and
19 I am not sure if I understood you correctly, but his intent
20 was to get information from you to prepare a pre-sentence
21 report. Is that fair?

22 MR. OUELLETTE: I'm not sure why he was
23 there.

24 MR. DUMAIS: Okay. Fair enough.

25 MR. OUELLETTE: He was preparing some kind

1 of statement with regard to my person.

2 **MR. DUMAIS:** Okay. Because before you --
3 before individuals are sentenced, when it is ordered by the
4 court for an adult, they prepare a pre-sentence report.

5 Do you know what that is?

6 **MR. OUELLETTE:** Yes, I do.

7 **MR. DUMAIS:** Okay. And perhaps this might
8 refresh your memory, if I can just take you then to
9 document 104871?

10 **(SHORT PAUSE/COURTE PAUSE)**

11 **THE COMMISSIONER:** All right. This is
12 Exhibit No. 583, which is a pre-sentence report for Mr.
13 Ouellette and it's -- the sentencing date is the
14 28/10/1997.

15 **--- EXHIBIT NO./PIÈCE NO. P-583:**

16 (104871) Pre-Sentence Report Regina vs.
17 Keith Ouellette dated 28 Aug 97

18 **MR. DUMAIS:** So usually you're asked to read
19 the pre-sentence report before the court proceeds to the
20 sentencing stage. Do you recall reading this report,
21 Keith?

22 **MR. OUELLETTE:** I was confused at first
23 because I had been charged twice with those offences ---

24 **MR. DUMAIS:** Okay.

25 **MR. OUELLETTE:** --- at different times, so I

1 got this confused with another time that I had been charged
2 with uttering threats.

3 MR. DUMAIS: Yes.

4 MR. OUELLETTE: So I remember this now more
5 clearly. Yes, I do remember this.

6 MR. DUMAIS: Okay. So then -- and if we
7 look at the first page of the report we see your name
8 there, the charge, the judge who took your plea and was
9 doing the sentencing, which appears to have been scheduled
10 on October 28, 1997, and the author of the report appears
11 to be a P.J. van Diepen.

12 MR. OUELLETTE: Yes, there are discrepancies
13 with this report. My father's name was Kenneth, not Tim.
14 It just goes to show how they do their job.

15 MR. DUMAIS: The -- hang on. Oh, all right.
16 So there's a reference in the first paragraph at Bates
17 pages 1042098 that:

18 "The subject's father who passed away
19 was Tim Tyo."

20 And that's not ---

21 MR. OUELLETTE: No, that's not his correct
22 name.

23 MR. DUMAIS: Okay. And his name was what
24 then?

25 MR. OUELLETTE: It's Kenneth.

1 **MR. DUMAIS:** Kenneth, okay. All right.

2 **MR. OUELLETTE:** And it's Taillon, not Tyo.

3 **THE COMMISSIONER:** How do you spell it?

4 **MR. OUELLETTE:** T-A-I-L-L-O-N.

5 **THE COMMISSIONER:** Taillon. Okay.

6 **MR. OUELLETTE:** Yes. It's not the first
7 time they do this to me.

8 **MR. DUMAIS:** And if I can just then take you
9 to the assessment page of the report, which on the report
10 is page 5, but it is Bates pages 1042100.

11 Now, the last paragraph of that page, a
12 little higher than mid-page, which starts with -- the
13 sentence starts with "Mr. Ouellette". I'll just read it
14 out for you:

15 "Mr. Ouellette reports being sexually
16 victimized by several males. A long
17 history of emotional duress and
18 unresolved counseling needs."

19 So do you recall having a discussion with
20 this Mr. van Diepen while you were in custody?

21 **MR. OUELLETTE:** Yes. Oh, I recall, yes.

22 **MR. DUMAIS:** And do you recall what you told
23 him about specific allegations of sexual abuse?

24 **MR. OUELLETTE:** I told him that a probation
25 officer, being that he was a probation officer, had

1 assaulted me, accosted me and harassed me sexually.

2 MR. DUMAIS: Yes.

3 MR. OUELLETTE: And in other ways,
4 psychologically, emotionally, and put me under duress and
5 had me falsely or wrongfully incarcerated at some point in
6 time for refusing to give him fellatio.

7 MR. DUMAIS: And do you recall specifically
8 speaking to him only about your allegations against Ken
9 Seguin or do you recall other discussions about other
10 allegations?

11 MR. OUELLETTE: I don't remember if I went
12 into specifically -- into names.

13 MR. DUMAIS: All right.

14 MR. OUELLETTE: Naming names, but I do
15 remember telling him that there were other people that had
16 had their way with me.

17 MR. DUMAIS: All right.

18 And at this point, when you refer to the
19 allegation against Ken Seguin, he would have asked you
20 whether or not you wanted to make a formal complaint
21 against him. Is that right?

22 MR. OUELLETTE: He said, and I quote, "If
23 you want to get out of here, I would suggest that you would
24 sign this piece of paper" and then he proceeded, while he
25 was saying this to me, to write what he wrote on the back

1 of this, I guess.

2 MR. DUMAIS: So you're making reference to
3 the back of a document.

4 MR. OUELLETTE: Some document, maybe not
5 this one, but one that's similar to this.

6 MR. DUMAIS: Well, maybe you can have a look
7 at document number 104879.

8 THE COMMISSIONER: Thank you. Exhibit 584 -
9 --

10 MR. OUELLETTE: Thank you.

11 THE COMMISSIONER: --- is a document --
12 well, I don't know what it is. It's signed by Ken K.
13 Ouellette on the 9/10/1997. You might want to flush out
14 what it is.

15 --- EXHIBIT NO./PIÈCE NO. P-584:

16 (104879) Handwritten Note fr Keith Ouellette
17 and Mr. Jos van Diepen dated 09 Oct 97

18 MR. DUMAIS: So is this the document that
19 you signed in front of Mr. van Diepen?

20 MR. OUELLETTE: It's a photocopy of one.

21 MR. DUMAIS: Yes, of course.

22 So if I'm looking at the last three lines on
23 that page, because the top wording of the page appears to
24 refer to the evidence or to an explanation with respect to
25 the evidence. So the last lines read:

1 "I do not want to file a formal
2 complaint against Ken Seguin."
3 And then it's signed at the bottom "Kenneth Ouellette".

4 **MR. OUELLETTE:** That was obtained under
5 duress.

6 **MR. DUMAIS:** Okay. That's not my question.
7 My question then is that is this the
8 document that you signed in front of Mr. van Diepen?

9 **MR. OUELLETTE:** It looks like the photocopy
10 of the one I signed.

11 **MR. DUMAIS:** A photocopy?

12 **MR. OUELLETTE:** Yes.

13 **MR. DUMAIS:** And that's your signature at
14 the bottom?

15 **MR. OUELLETTE:** Yes, it is.

16 **MR. DUMAIS:** Okay. I can't really tell
17 whether or not this is all of your handwriting or if ---

18 **MR. OUELLETTE:** It's his handwriting. I
19 just signed.

20 **MR. DUMAIS:** Okay. So the only written
21 portion of this document that belongs to you is your
22 signature?

23 **MR. OUELLETTE:** Well, you can tell by the
24 "K".

25 **MR. DUMAIS:** Well, I can't.

1 **THE COMMISSIONER:** What about on top here
2 where it says "I did not hear all the evidence," Mr.
3 Ouellette? If you look up here, can you tell me, is this
4 your handwriting?

5 **MR. OUELLETTE:** No, it isn't.

6 **THE COMMISSIONER:** Okay. And is this a
7 signature at the bottom?

8 **MR. OUELLETTE:** My signature is at the very
9 bottom and that wiggle, I have no idea what that is. I
10 think that's van Diepen's initials because that's what it
11 looks like to me.

12 **THE COMMISSIONER:** Well, you may be right.

13 **MR. DUMAIS:** Now, at this time, Keith, did
14 you know whether Ken Seguin was still alive or not?

15 **MR. OUELLETTE:** I'm not sure, but I don't
16 believe I did.

17 **MR. DUMAIS:** And this discussion about a
18 formal complaint, what did you understand that to be?

19 **MR. OUELLETTE:** Basically, going to the
20 chief of police, going to the police and making a formal
21 complaint and/or the Probation/Corrections, whatever it
22 took, whoever it took.

23 **MR. DUMAIS:** And then were you saying at
24 that time that you wanted to make a formal complaint?

25 **MR. OUELLETTE:** At the time, I wanted out of

1 jail because I didn't find that what I had done was that
2 serious and it wasn't done purposefully or with intent to
3 harm. Therefore, I ---

4 **MR. DUMAIS:** Just with respect to the
5 complaint, Keith, did you want to make a formal complaint
6 or not?

7 **MR. OUELLETTE:** Well, deep in my heart I
8 would have chose -- chosen to, but I was discouraged
9 because he told me that if I wanted to get out of here --
10 which was jail -- that I should sign this document.

11 **MR. DUMAIS:** All right.

12 So at the time you signed this you felt
13 coerced to sign it?

14 **MR. OUELLETTE:** Definitely.

15 **MR. DUMAIS:** Okay. And that was back in
16 1997?

17 **MR. OUELLETTE:** It may have been 1997.

18 **MR. DUMAIS:** All right.

19 So there is a date there at the bottom 9-10-
20 97.

21 **MR. OUELLETTE:** Must be.

22 **MR. DUMAIS:** All right.

23 Now, in doing the preparation for your
24 evidence you have seen documents that show that Mr. Van
25 Diepen reported the matter to Probations and Corrections?

1 **MR. OUELLETTE:** Could you repeat that,
2 please?

3 **MR. DUMAIS:** After Mr. Van Diepen met with
4 you he filed a report with his employer.

5 **MR. OUELLETTE:** I wasn't aware of that
6 except for the report that was on the opposite page of this
7 right here.

8 **MR. DUMAIS:** Okay. Well, perhaps we can
9 just have a look then.

10 **THE COMMISSIONER:** M'hm.

11 **MR. DUMAIS:** And actually, Commissioner,
12 this is a cross document, and the cross documents are
13 presently being prepared for the hearings room.

14 Perhaps if I can just set that question
15 aside now and I will get back to that.

16 **MR. MANSON:** I may be the only one in the
17 room, but I don't know what a cross document is.

18 **THE COMMISSIONER:** A document that was put
19 for cross-examination.

20 **MR. MANSON:** Oh, I apologize.

21 **MR. DUMAIS:** It's Document Number 104884.

22 Now, shortly after this -- shortly after
23 October -- the beginning of October 1997, you went to
24 court, Keith, and you were sentenced on the threatening
25 charge. Is that correct?

1 **MR. OUELLETTE:** Yes.

2 **MR. DUMAIS:** And my understanding is that at
3 that time you were sentenced to a period of custody. You
4 were sent to jail?

5 **MR. OUELLETTE:** I was sent to jail for that,
6 yes.

7 **MR. DUMAIS:** And while you were in jail
8 someone contacted you from Project Truth. Is that correct?

9 **MR. OUELLETTE:** Yes.

10 **MR. DUMAIS:** And do you recall the name of
11 the person that called you?

12 **MR. OUELLETTE:** Called me?

13 **MR. DUMAIS:** Yes.

14 **THE COMMISSIONER:** Who went and seen you.

15 **MR. OUELLETTE:** Oh.

16 **MR. DUMAIS:** Did someone call you?

17 **MR. OUELLETTE:** Nobody called me. They
18 visited me.

19 **MR. DUMAIS:** Okay.

20 **MR. OUELLETTE:** And they put me in this
21 room, an interview room. It was Sergeant Joe Dupuis, our -
22 - Joe Dupuis -- I'm not sure if he is a sergeant -- and Mr.
23 Seguin.

24 **MR. DUMAIS:** Yes. I think they were both
25 detective constables at the time.

1 So they came to see you while you were
2 incarcerated. Is that correct?

3 MR. OUELLETTE: Yes, they have -- did.

4 MR. DUMAIS: Okay. And they took a
5 statement from you?

6 MR. OUELLETTE: Yes.

7 MR. DUMAIS: And that was around October
8 30th, 1997 and we have a copy of your statement. Is that
9 right?

10 MR. OUELLETTE: Yes.

11 MR. DUMAIS: Okay. I'm just going to ask
12 you a few questions about the statement, but before then,
13 do you know how Detective Constables Seguin and Dupuis got
14 your name, how you showed up?

15 MR. OUELLETTE: I have no -- I have no idea.

16 MR. DUMAIS: Okay. And they did not tell
17 you, "We received a report from this person or this
18 person"?

19 MR. OUELLETTE: None, nothing like that.

20 MR. DUMAIS: Okay. So when they first met
21 with you, did they know what you had to say, what your
22 allegations were or not?

23 MR. OUELLETTE: They seemed to know what I
24 was about to tell them before I even uttered any words.

25 MR. DUMAIS: Okay. And you never asked them

1 where they got the information?

2 **MR. OUELLETTE:** Actually, I did ask them.
3 They just didn't tell me.

4 **MR. DUMAIS:** Okay. So then if we can just
5 have a look at Document Number 710907?

6 **(SHORT PAUSE/COURTE PAUSE)**

7 **THE COMMISSIONER:** Thank you.

8 Exhibit 585 is an audio-taped interview
9 report of Keith Kenneth Ouellette. The date of the
10 interview is the 30th of October 1997.

11 **--- EXHIBIT NO./PIÈCE NO. P-585:**

12 (710907) Transcript of Audio Taped Interview
13 Report - Keith Ouellette w/ OPP - S. Seguin
14 and J.B. Dupuis dated 30 Oct 97

15 **MR. DUMAIS:** So in preparation for your
16 evidence, Keith, you did have a look at this statement; you
17 did go through it?

18 **MR. OUELLETTE:** Very briefly.

19 **MR. DUMAIS:** Okay.

20 **MR. OUELLETTE:** Because I didn't want it to
21 pollute my testimony.

22 **MR. DUMAIS:** Fair enough.

23 And this statement that they took was an
24 audio statement; is that correct, they taped it?

25 **MR. OUELLETTE:** Yes.

1 **MR. DUMAIS:** All right.

2 And at the page 40 of the statement, Bates
3 page 7042223, so the top paragraph there, this is Detective
4 Constable Seguin that explains to you what their mandate
5 is. So I am just going to read it out:

6 "Can I get you to sign underneath?"

7 Where you said:

8 "Yes, I do".

9 "Thank you. Okay. As I mentioned,
10 Keith, we are conducting an
11 investigation involving historic sexual
12 abuse in the Cornwall area involving
13 the clergy and other public officials.
14 During our investigation your name has
15 come up as somebody who may have
16 information and may be able to assist
17 us. First off, let's maybe start with
18 a little background yourself."

19 And then they go through some of the
20 background, some personal background.

21 So when you heard this mandate did you think
22 that the allegations that you were sexually abused by
23 Richard would fall within that mandate? Did you ask that
24 question?

25 **MR. OUELLETTE:** Richard Ouellette or Richard

1 Hickerson?

2 **MR. DUMAIS:** Sorry, Richard Ouellette.

3 **MR. OUELLETTE:** At the time my mother, my
4 adoptive mother, was still alive, so even if they would
5 have asked me about Richard I would have said nothing about
6 it.

7 **MR. DUMAIS:** Okay.

8 **MR. OUELLETTE:** Not to embarrass the family.

9 **MR. DUMAIS:** All right.

10 **MR. OUELLETTE:** But as for the rest, I was
11 quite willing to talk about it.

12 **MR. DUMAIS:** Okay. And you do go on and go
13 through the allegations of abuse by Ken Seguin. Is that
14 correct?

15 **MR. OUELLETTE:** Yes, I do.

16 **MR. DUMAIS:** And as well, you do go through
17 the allegations of sexual abuse by Richard Hickerson?

18 **MR. OUELLETTE:** Yes, I did.

19 **THE COMMISSIONER:** Sorry, should this be
20 "P"? Is this a "P" exhibit as well?

21 **MR. DUMAIS:** No, this, Commissioner, can be
22 a "P" exhibit, yes.

23 **THE COMMISSIONER:** Yes, that's what I mean,
24 yes.

25 **MR. DUMAIS:** Now, I would just like to take

1 you to page 46 of this statement, so Bates page 7042229.

2 It's about mid-page and it's Detective
3 Constable Seguin speaking. He says:

4 "Okay. Now, we all know that Ken
5 Seguin is deceased now. You mentioned
6 that he introduced you to a fellow by
7 the name of Hickerson."

8 So is it fair to say that by that time it
9 appears that you would have been told that Ken Seguin was -
10 --

11 **MR. OUELLETTE:** That's probably the occasion
12 where they did tell me.

13 **MR. DUMAIS:** Okay.

14 **MR. OUELLETTE:** Because it was either
15 Constable Dupuis or Seguin who did inform me that in fact
16 Ken Seguin had died, but Richard Hickerson, at the time of
17 this deposition, was still alive.

18 **MR. DUMAIS:** Yes.

19 So I have a further question. It's a little
20 further down in your statement. It's found at page 0054,
21 Bates page 7042227. So about the fifth entry from the top
22 and then again it said -- it's Detective Constable Seguin
23 that's speaking. He says:

24 "You mention a couple -- last week, I
25 believe, we spoke to you."

1 So that was my earlier question, Keith,
2 whether or not you had previously met with them or
3 previously spoke to them and set up this meeting?

4 **MR. OUELLETTE:** When I set up the meeting
5 after I was released from prison, when I set up the meeting
6 to be re-interviewed he may have mentioned Ken Seguin's
7 death then. As I mentioned to you before, that's probably
8 when I found out.

9 **MR. DUMAIS:** Okay. So just that we're
10 clear, Keith, so this is the statement beyond your
11 statement you give to ---

12 **THE COMMISSIONER:** Seguin and Dupuis.

13 **MR. DUMAIS:** --- Seguin and Dupuis while in
14 custody?

15 **MR. OUELLETTE:** Right.

16 **MR. DUMAIS:** So this is your taped
17 conversation and they are making reference to a previous
18 conversation.

19 **THE COMMISSIONER:** Well, can I just ---

20 **MR. OUELLETTE:** In jail there was no
21 previous visit.

22 **THE COMMISSIONER:** Can I just stop you for a
23 second?

24 Exhibit 585 he says the place of the
25 interview was the Ouellette residence.

1 **MR. OUELLETTE:** Right.

2 **THE COMMISSIONER:** Is that jail?

3 **MR. OUELLETTE:** No.

4 **THE COMMISSIONER:** Okay. So he is not in
5 jail when he is giving this statement?

6 **MR. OUELLETTE:** It's after jail.

7 **(SHORT PAUSE/COURTE PAUSE)**

8 **MR. DUMAIS:** All right, Keith. It may be
9 that I am the one who is mistaken about this.

10 Just so that I am clear, the detective
11 constables go and see you in jail but they don't actually
12 take an actual statement. Is that correct?

13 **MR. OUELLETTE:** They took at audiotape
14 statement of me and because I didn't want to appear to the
15 other inmates as being an informant for the police, I kind
16 of made it very short ---

17 **MR. DUMAIS:** Yes.

18 **MR. OUELLETTE:** --- and told them that I
19 would be willing -- I'd think about it but most likely
20 willing to talk about it later, at a later time from my
21 home after release, if I was going to be released. As a
22 consequence, consequently, I made an initial phone call to
23 the OPP and spoke to Joe Dupuis and made an appointment for
24 an interview at my home in Applehill.

25 **MR. DUMAIS:** Yes.

1 **MR. OUELLETTE:** And either at that time or
2 at the time that they interviewed me, they informed me that
3 Ken Seguin had deceased ---

4 **MR. DUMAIS:** All right.

5 **MR. OUELLETTE:** --- recently. And before
6 that I had no idea.

7 **MR. DUMAIS:** All right. So I apologize. I
8 am the one who is confused about this, Keith.

9 Now, as well in this statement, and I
10 believe it's the first time that there is a recording of
11 this allegation, you do make reference to an allegation of
12 sexual abuse by a gentleman by the name of Chris Wilson.
13 Is that correct?

14 **MR. OUELLETTE:** Yes, I do.

15 **MR. DUMAIS:** And who was this Chris Wilson,
16 Keith?

17 **MR. OUELLETTE:** He was the theatrical
18 manager of Aultsville Hall at St. Lawrence College
19 approximately at the time that I was attending college and
20 just previous to -- just prior to the time that I attended
21 college.

22 **MR. DUMAIS:** Okay. And so he -- and again,
23 Keith, you indicate to them that you were a victim of
24 sexual abuse of Mr. Wilson. Is that correct?

25 **MR. OUELLETTE:** Sexual harassment and a

1 survivor of sexual attacks and harassment, not a victim.

2 MR. DUMAIS: All right.

3 But at one point in time, Keith, you did
4 develop a relationship with Mr. Wilson, if I can -- can I
5 put it that way? Is that fair?

6 MR. OUELLETTE: M'hm. Yes, that is fair,
7 due to drugs and ---

8 MR. DUMAIS: All right.

9 MR. OUELLETTE: --- a blackout, knock out
10 drugs, date rape drugs.

11 MR. DUMAIS: And is it fair to say -- and
12 correct me if I'm wrong -- whether or not in your mind
13 consent may have been an issue with respect to the
14 allegation of Mr. Wilson?

15 MR. OUELLETTE: After having been had by or
16 approached by at least four men -- and I am minimizing this
17 -- in the Cornwall area, I started to question my own
18 sexuality.

19 MR. DUMAIS: Yes.

20 MR. OUELLETTE: Being confused, having been
21 to jail, been in sensory deprivation, et cetera, you tend
22 to lose your identity and your sense of self worth and self
23 esteem and you start to question who you are and what you
24 are. In my search and quest to find out what I was about
25 and who I was about, I decided to experiment because I

1 wanted to know whether I was gay, bisexual, heterosexual or
2 whatever.

3 **THE COMMISSIONER:** Okay. So during that
4 period of time there may have been some issue of consent.

5 **MR. OUELLETTE:** Consensual sex.

6 **THE COMMISSIONER:** With Mr. Wilson.

7 **MR. OUELLETTE:** There was consensual sex
8 after I was corrupted.

9 **THE COMMISSIONER:** M'hm.

10 **MR. DUMAIS:** Sorry, Madam Clerk, did we get
11 the -- all right.

12 All right. So then in this statement, then,
13 you make reference to allegations against Mr. Wilson, Mr.
14 Seguin and, as well, Mr. Hickerson. Is that right?

15 **MR. OUELLETTE:** Yes, I do.

16 **MR. DUMAIS:** All right.

17 **MR. OUELLETTE:** And did.

18 **MR. DUMAIS:** And how do you guys end the
19 interview? What -- is there a follow up? What is said or
20 what is decided? Do you recall that?

21 **MR. OUELLETTE:** No, I don't.

22 **MR. DUMAIS:** And after 1997, I understand
23 that you made a further statement to Project Truth
24 specifically about the allegations regarding Mr. Wilson.
25 Is that right?

1 **MR. OUELLETTE:** Yes.

2 **MR. DUMAIS:** And that would have been
3 sometime in 2000. Is that correct?

4 **MR. OUELLETTE:** I would -- if I'm not
5 mistaken, I believe it's approximately about the time that
6 I filed a complaint with the Criminal Injuries Compensation
7 Board.

8 **MR. DUMAIS:** Okay. And just before we go
9 there, Keith, I just want to bring you back with respect to
10 my earlier question on what Mr. van Diepen would have done
11 after he met with you in early October '97, and if I can
12 just take you then to Doc Number 104884?

13 **THE COMMISSIONER:** Yes, Exhibit 586 is a
14 fender incident report, date prepared the 10th of October,
15 1997.

16 **--- EXHIBIT NO./PIÈCE NO. P-586:**

17 (104884) Offender Incident Report - Keith
18 Ouellette dated 10 Oct 97

19 **MR. DUMAIS:** Well, you may not have -- you
20 didn't remember seeing this document, Keith, so I will just
21 let you go through it.

22 **(SHORT PAUSE/COURTE PAUSE)**

23 **MR. DUMAIS:** So this appears to be an
24 offender incident report, and if we look at the date it
25 looks like it was prepared, on the bottom right corner, on

1 October 10th, 1997. It appears to have been prepared by Mr.
2 van Diepen. I know you can't answer that question, but ---

3 **MR. OUELLETTE:** Yes, I can. I recognize his
4 initials.

5 **MR. DUMAIS:** Okay. So the same initials
6 that -- on the ---

7 **MR. OUELLETTE:** Yes.

8 **MR. DUMAIS:** On the other document.

9 So he quotes you in saying -- or actually,
10 he explains to you what he told you:

11 "Mr. Ouellette was cautioned that
12 anything he would say could be recorded
13 on with respect to the above. He said
14 'Go ahead.' He was advised that there
15 were channels he could pursue,
16 including making a formal complaint.
17 Mr. Ouellette said that he did not want
18 to, 'Nobody will believe me anyway.'
19 Client was advised that he should
20 consider all factors, not just his own.
21 He declined to make a formal complaint
22 and did not want to pursue same at this
23 time."

24 **MR. OUELLETTE:** Because I was coerced.

25 **MR. DUMAIS:** Okay. Well, if you can -- so

1 my question then is do you recall Mr. van Diepen giving you
2 this explanation?

3 **MR. OUELLETTE:** I recall Mr. van Diepen
4 giving me the explanation that if I were to try to bring
5 any action against Ken Seguin that I could remain in jail -
6 --

7 **MR. DUMAIS:** Okay.

8 **MR. OUELLETTE:** --- as a consequence.

9 **MR. DUMAIS:** Okay. All right.

10 And just one last question on this offender
11 incident report, Keith, and it's at the bottom. It's a
12 written note, two asterisks in the bottom:

13 "File is closed 1991, destroyed"

14 And then the second asterisk:

15 "Client was referred to Regional Task
16 Force, Operation Truth"

17 So do you know whether or not Mr. van Diepen
18 had any discussion with you with respect to referring your
19 matter to ---

20 **MR. OUELLETTE:** None whatsoever.

21 **MR. DUMAIS:** All right.

22 **MR. OUELLETTE:** Can I ask a question?

23 **MR. DUMAIS:** Certainly.

24 **MR. OUELLETTE:** The people, like the
25 probation office, who were so interested in finding out

1 what was happening, why do they always insist on destroying
2 files?

3 **THE COMMISSIONER:** So you're referring to
4 the file closed in 1991 and destroyed?

5 **MR. OUELLETTE:** Almost all files that I had
6 anything to do with or with regards to me have been either
7 altered in some fashion, way, shape or form to make me look
8 discredited, such as the name of my father, my children's
9 names, their sex, my address, et cetera.

10 **MR. DUMAIS:** Keith, your point is taken, and
11 Mr. van Diepen appears to be the author of that offender
12 incident report, and we certainly undertake to ---

13 **MR. OUELLETTE:** It seems genuine to me.

14 **MR. DUMAIS:** --- ask him a question.

15 **THE COMMISSIONER:** We are, as part of the
16 Inquiry, looking into procedures and that kind of thing,
17 and we will somewhere down the road look at the
18 institutional response of Probation Services and what were
19 the procedures with respect to files being destroyed after
20 a certain period of time. We will look at that.

21 **MR. OUELLETTE:** I just wanted the
22 Commissioner aware of ---

23 **THE COMMISSIONER:** Your feelings on it.
24 Yes. Thank you.

25 **MR. DUMAIS:** Now, so after you make this

1 audiotape statement on October 30th, 1997, obviously, Keith,
2 there would not have been an investigation, a criminal
3 investigation into your allegations against Ken Seguin;
4 correct?

5 **MR. OUELLETTE:** Could you repeat that,
6 please?

7 **MR. DUMAIS:** After your statement on October
8 30th, '97, there would not have been a criminal
9 investigation regarding your allegations against Ken Seguin
10 ---

11 **THE COMMISSIONER:** Because he was dead.

12 **MR. DUMAIS:** --- because he was dead?

13 **THE COMMISSIONER:** Do you understand that?

14 **MR. OUELLETTE:** You mean when OPP came over
15 and interviewed me, they couldn't charge him because he was
16 already deceased?

17 **THE COMMISSIONER:** Right.

18 **MR. OUELLETTE:** So the investigation stopped
19 dead in its tracks right there basically. Is that what
20 you're suggesting?

21 **MR. DUMAIS:** Yes, correct.

22 **MR. OUELLETTE:** I think that's about right.

23 **MR. DUMAIS:** Okay. But Mr. Hickerson at
24 that time was still alive?

25 **MR. OUELLETTE:** Yes, he was.

1 **MR. DUMAIS:** And as far as you knew, Keith,
2 they were investigating the matter. Is that fair?

3 **MR. OUELLETTE:** According to what I was told
4 by those two detectives, Mr. Hickerson had committed
5 suicide due to the fact that they had approached him with
6 regard to the matter of which I accused him of and, as a
7 consequence, he committed suicide by hanging himself in his
8 basement.

9 **MR. DUMAIS:** Okay. So let's just break this
10 down a bit. So as far as you knew, after your statement
11 there was an ongoing criminal investigation regarding
12 Richard Hickerson?

13 **MR. OUELLETTE:** After what I had stated,
14 yes.

15 **MR. DUMAIS:** Yes.

16 And were you ever made aware that there were
17 more than one victim?

18 **MR. OUELLETTE:** No, not at the time.

19 **MR. DUMAIS:** All right.

20 And at the time, you did not have any
21 contact with any of the other victims either, the alleged
22 victims?

23 **MR. OUELLETTE:** None whatsoever, none.

24 **MR. DUMAIS:** Okay. And at one point in time
25 you found out or you were told or made aware that Mr.

1 Hickerson had committed suicide. Is that ---

2 **MR. OUELLETTE:** Joe Dupuis phoned me
3 approximately a week after my testimony, maybe 10 days, and
4 informed me that Richard Hickerson had committed suicide.

5 **MR. DUMAIS:** Okay. So you're made aware of
6 that?

7 **MR. OUELLETTE:** Yes.

8 **MR. DUMAIS:** And that essentially terminated
9 that investigation?

10 **MR. OUELLETTE:** Yes, but it made me very
11 happy.

12 **MR. DUMAIS:** The other allegation remaining
13 then was the allegation against Chris Wilson?

14 **MR. OUELLETTE:** Yes.

15 **MR. DUMAIS:** And what was -- were you
16 informed of the progress of this investigation? Did you
17 know whether or not there was an ongoing investigation with
18 respect to Mr. Wilson?

19 **MR. OUELLETTE:** The way it was put to me is
20 that because there was a matter of consensual sex, it
21 eventually turned into that. You have to realize that this
22 took about six months to occur. So after being abused and
23 harassed for about four months, I just buckled under the
24 pressure, and there was a lot of drugs used. So because
25 there was consensual sex they decided not to -- I wasn't

1 aware that they were going to press any charges. In fact,
2 they told me the opposite. They told me that they wouldn't
3 be pressing charges.

4 **MR. DUMAIS:** All right.

5 And again, Keith, we'll just take it one
6 step at a time. So we're still back in October of '97. At
7 some time in '98, Mr. Hickerson commits suicide. So then
8 the only remaining allegation had to do with Chris Wilson?

9 **MR. OUELLETTE:** Yes.

10 **MR. DUMAIS:** And at one point in time -- and
11 perhaps what I'll do is I'll just refer you to the
12 document. It might assist you. And that's document 72122
13 -- oh sorry -- 7076686 -- 721220. I was right the first
14 time.

15 **(SHORT PAUSE/COURTE PAUSE)**

16 **THE COMMISSIONER:** Okay, Exhibit No. 587 is
17 a videotaped interview report of Keith-Kenneth Ouellette.
18 The date of the interview, 25th of May. Year, 2000. Place
19 of interview the OPP Detachment, Lancaster, Ontario.

20 --- **EXHIBIT NO./PIÈCE NO. P-587:**

21 (721220) Transcript of Video-taped Interview
22 Report - Keith Ouellette w/OPP - J.B. Dupuis
23 and D.C. Genier dated May 25th, 2000

24 **MR. DUMAIS:** So Keith, this appears to be a
25 statement that you would have given on May 25th, 2000 while

1 you are living at 18-536 Diversion Road in Applehill, and
2 the interview place appears to be the SDNG OPP detachment
3 in Lancaster. And again, it's a statement that would have
4 been taken by Detective Constable Dupuis and Genier. So do
5 you recall this second statement being ---

6 **MR. OUELLETTE:** I remember Joe Dupuis being
7 there. I'm not certain about the other officer.

8 **MR. DUMAIS:** Okay. And do you recall how
9 this interview came about?

10 **MR. OUELLETTE:** I think they wanted to do a
11 follow-up on Chris Wilson to make certain that I wasn't
12 forgetting anything that they could possibly charge him
13 with. In other words, they were trying to enable me to
14 proceed.

15 **MR. DUMAIS:** All right.

16 Now, were you made aware at that time that
17 they were still investigating this matter?

18 **MR. OUELLETTE:** I can't recall.

19 **MR. DUMAIS:** You can't recall.

20 And in between the dates of the two
21 statements, so '97 and 2000, you would have been -- you
22 would have had contact with either Detective Constable
23 Dupuis or Genier, is that ---

24 **MR. OUELLETTE:** With Joe Dupuis, constantly,
25 almost daily.

1 **MR. DUMAIS:** All right. So you would call
2 him and he would call back. So do you recall whether or
3 not in any of these discussions whether or not there were
4 any conversations about the Wilson investigation?

5 **MR. OUELLETTE:** Yes. I was very aggravated
6 over the fact that my other two perpetrators were dead and
7 that I couldn't do anything about it. It aggravated me and
8 I thought to myself that something has to be done about Mr.
9 Wilson and my brother but I hesitated with my brother, but
10 I wanted to continue on with Mr. Wilson.

11 **MR. DUMAIS:** All right. So they brought you
12 back in and you went into more details of the allegation.
13 Is that right?

14 **MR. OUELLETTE:** Pretty well, yes.

15 **MR. DUMAIS:** And did they discuss with you
16 at that time whether or not they would bring in Mr. Wilson
17 for a statement, or what other investigative steps they
18 were taking?

19 **MR. OUELLETTE:** I think they told me that
20 they had gone to see him and interrogated him, and that he
21 was in denial about it and/or had another kind of story
22 that discredited me.

23 **MR. DUMAIS:** All right.

24 And at one point in time, and perhaps that
25 was what you were alluding to, the Assistant Crown Attorney

1 for Cornwall gave an opinion on this investigation, and I'm
2 just going to point you out to document number 111182.

3 (SHORT PAUSE/COURTE PAUSE)

4 MR. DUMAIS: Just for the record,
5 Commissioner, Mr. Godin was not the Assistant Crown
6 Attorney in Cornwall. He would have been in another
7 jurisdiction and I actually note from the letterhead that
8 it was ---

9 THE COMMISSIONER: Exhibit 588 is a memo
10 from Inspector Pat Hall from Alain Godin dated June 29th,
11 2000.

12 --- EXHIBIT NO./PIÈCE NO. P-588:

13 (111182) Memo from Alain Godin to Insp. Pat
14 Hall re: John Christopher Wilson dated June
15 29th, 2000

16 MR. DUMAIS: Now -- and I am just drawing
17 your attention to the last paragraph and I'll just read it
18 out loud:

19 "There is also a problem with the
20 consent issue which if Mr. Ouellette
21 were to be pushed we could not
22 distinguish whether it was given or
23 refused. The transactions cannot be
24 clearly distinguished by the victim on
25 many occasions. He cannot positively

1 say that things were done to him or who
2 did it. In conclusion, there is not
3 enough of a case to proceed against Mr.
4 Wilson."

5 So that appears to be a finding of an
6 assistant crown attorney outside of their jurisdiction. I
7 mean, today looking at this, Keith, do you agree or
8 disagree with those findings?

9 MR. OUELLETTE: I could see why they would
10 have a finding like this.

11 MR. DUMAIS: All right.

12 MR. OUELLETTE: But when you're being
13 knocked out or if you drink enough alcohol, do you recall
14 the next day? They don't take your keys away for nothing
15 when you drive drunk.

16 MR. DUMAIS: All right.

17 So then would it be fair to say, Keith, that
18 you still believe that initially you would have been
19 sexually abused by Chris Wilson; that later on it developed
20 into a sexual relationship and you understand the position
21 that the Crown took on this matter not to proceed with
22 charges. Is that a fair statement?

23 MR. OUELLETTE: Fair enough. If relations
24 did take place, which they did ---

25 MR. DUMAIS: Yes.

1 **MR. OUELLETTE:** I assure you they have.
2 Surely there had to have been some preliminary actions that
3 led up to it. Therefore, I find it actually incompetent
4 and I find the whole thing incompetent. I think he should
5 have been charged. I think I should have been believed and
6 I think that the authorities didn't act with the full power
7 that they had entrusted in them by the public.

8 **MR. DUMAIS:** All right.

9 So then whereas you understand what the
10 opinion was, you still believe that the allegation
11 warranted charges being laid. Is that fair?

12 **MR. OUELLETTE:** Yes, can I answer with a
13 fact?

14 **MR. DUMAIS:** You may.

15 **MR. OUELLETTE:** He had been charged with
16 buggery before. I had knowledge of the fact that he had
17 approached friends of mine and he knocked me out and I woke
18 up in his bed naked. I wasn't dressed that time.

19 **THE COMMISSIONER:** Just a second now. Did
20 you -- are those comments that are concluded in the
21 statements that you had given to the police?

22 **MR. OUELLETTE:** At some point this person
23 who read this and commented on it had had to have all the
24 knowledge that was given to him and selected this
25 arbitrarily to discredit me, or to account for his

1 incompetency in dealing with the matter of paedophilia in
2 the area.

3 **MR. DUMAIS:** So then, Keith ---

4 **MR. OUELLETTE:** Or sexual assaults of any
5 kind.

6 **MR. DUMAIS:** So then, Keith, your position -
7 - your belief today remains that charges should have been
8 laid against ---

9 **MR. OUELLETTE:** I can assure you that if I
10 were to drug somebody and ---

11 **THE COMMISSIONER:** Just answer the question.

12 **MR. OUELLETTE:** Yes, I do believe that.
13 Yes, I think he should have been charged and dealt with
14 accordingly.

15 **MR. DUMAIS:** Okay. All right.

16 And as far as you are aware, did this June
17 opinion letter essentially terminate the investigation and
18 the prosecution of -- or the investigation of John
19 Christopher Wilson?

20 **MR. OUELLETTE:** It kind of like all fizzled
21 out.

22 **MR. DUMAIS:** I understand then, Keith, that
23 you would have been contacted by the Cornwall Community
24 Police later that year, so in November of 2000 by a
25 Constable Pare. Do you recall that?

1 **MR. OUELLETTE:** What was the date again,
2 please?

3 **MR. DUMAIS:** November 24th, 2000.

4 **MR. OUELLETTE:** Well, the officer's name
5 doesn't ring a bell but I was contacted by very many
6 people, so I'm sorry I don't really recall that.

7 **THE COMMISSIONER:** He will help you; situate
8 it a little more.

9 **MR. DUMAIS:** Fair enough.

10 And the person that would have contacted you
11 from Cornwall Police Services wanted to take a statement
12 from you regarding your allegations with respect to Richard
13 Ouellette?

14 **MR. OUELLETTE:** Oh yes, yes.

15 **MR. DUMAIS:** And perhaps, Keith, we can have
16 a look at the statement that you gave and that's document
17 number 733918.

18 **THE REGISTRAR:** Can you repeat the number,
19 please?

20 **MR. DUMAIS:** Seven-three-three-nine-one-
21 eight (733918).

22 **THE COMMISSIONER:** Thank you.

23 This is Exhibit Number 589. It is a witness
24 statement taken by Officer Pare of Kenneth Ouellette on --
25 let's see -- the 24th of November 2000.

1 ---EXHIBIT NO./PIÈCE NO P-589:

2 (733918) Witness Statement by Richard
3 Ouellette to CPS dated November 24th, 2000

4 **MR. DUMAIS:** And I'll let you read through
5 it, Keith.

6 (SHORT PAUSE/COURTE PAUSE)

7 **MR. OUELLETTE:** The only discrepancy is that
8 I started drugs in 1967 but attempted suicide in 1971.

9 **MR. DUMAIS:** All right.

10 And this, Keith -- and I believe is a
11 summary of the statement you gave to Constable Pare in
12 2000. Do you recall that statement? Do you recall ---

13 **MR. OUELLETTE:** Yes, I do. It's very
14 accurate.

15 **MR. DUMAIS:** Okay. So you made this initial
16 statement in November of 2000. Do you recall what happened
17 afterwards? What discussion you had with him? Whether or
18 not he'd be proceeding with this matter or investigating
19 this matter?

20 **MR. OUELLETTE:** On this occasion, no, I
21 don't.

22 It's possible he referred me to somebody
23 else and the matter was then taken in hand by another
24 officer, and then perhaps I'm getting that confused with an
25 Emma somebody but I did try to have charges laid against my

1 brother for this.

2 MR. DUMAIS: Okay. And by that point in
3 time, so in November of 2000, you wanted to proceed with
4 charges against Mr. Richard Ouellette. Is that correct?

5 MR. OUELLETTE: After my adoptive mother
6 passed away, yes.

7 MR. DUMAIS: Do you recall when that was
8 Keith, offhand?

9 MR. OUELLETTE: Not sure about the date.

10 MR. DUMAIS: Okay. Was it that year, in
11 2000?

12 MR. OUELLETTE: I am not sure about the
13 date.

14 MR. DUMAIS: Okay. So then, if you can just
15 have a look at document number 737515.

16 THE COMMISSIONER: Can we just -- one little
17 point I'd like clear.

18 How did this witness statement come about?
19 Did you phone the police and say "Now, I'm ready to ---

20 MR. OUELLETTE: When my mother died ---

21 THE COMMISSIONER: Yes?

22 MR. OUELLETTE: --- I was driving along the
23 street and I had to stop for gas at the McEwen's ---

24 THE COMMISSIONER: M'hm.

25 MR. OUELLETTE: --- and as I was taking gas,

1 I saw my brother there.

2 THE COMMISSIONER: M'hm.

3 MR. OUELLETTE: And there was a little girl
4 beside him ---

5 THE COMMISSIONER: M'hm.

6 MR. OUELLETTE: --- and it seemed to me -- I
7 might have been mistaken -- but it really looked like he
8 was holding her hand and that he was grooming her for some
9 sort of sexual exploitation.

10 Therefore, I acted upon that; went in there
11 and confronted him and when he denied -- and then I also
12 had a conversation with my brother and called him over to
13 my house to confront him about my sexual abuse at his
14 hands. And when he refused to apologize and acknowledge
15 that it happened ---

16 THE COMMISSIONER: M'hm.

17 MR. OUELLETTE: --- that's when I decided to
18 lay charges.

19 THE COMMISSIONER: Okay, thank you.

20 MR. DUMAIS: So then you would have
21 communicated with Cornwall Police Services?

22 MR. OUELLETTE: Yes.

23 THE COMMISSIONER: Is this a new exhibit?

24 MR. DUMAIS: And asked to come in and make
25 this statement?

1 **MR. OUELLETTE:** Yes.

2 **THE COMMISSIONER:** All right. So Exhibit
3 590 is a what -- general occurrence report, 24th of November
4 2000.

5 **MR. DUMAIS:** I actually apologize,
6 Commissioner. There is no real need to file this
7 statement.

8 **THE COMMISSIONER:** There is no need for ---

9 **MR. DUMAIS:** To file this exhibit as an
10 exhibit.

11 **THE COMMISSIONER:** Okay. So has the witness
12 received this? Can we take it back from him, please?

13 **MR. DUMAIS:** I apologize, Commissioner.

14 **MR. OUELLETTE:** May I be excused to go to
15 the washroom?

16 **THE COMMISSIONER:** Actually, why don't we
17 close up for the day? How about that? And you come back
18 at 9:30 a.m.

19 **MR. OUELLETTE:** Actually, I would prefer to
20 go the washroom and come back and answer some more
21 questions.

22 **THE COMMISSIONER:** I know, but it's 4:30
23 p.m. and we would prefer to call it a day.

24 **MR. OUELLETTE:** I've been waiting 35 years,
25 sir.

1 **THE COMMISSIONER:** Yes, I understand that,
2 sir. And what I am telling you is you can come back
3 tomorrow morning and we'll have the whole day.

4 **MR. OUELLETTE:** Fine.

5 **THE COMMISSIONER:** No, well -- just -- you
6 have to understand that ---

7 **MR. OUELLETTE:** It's okay.

8 **THE COMMISSIONER:** --- we have to be fresh
9 to be able to understand everything that's going on. And
10 we've been going at this for many months and so, if we went
11 on every night, we'd burn out. And so in order to -- if
12 you can respect that for me a little bit that tomorrow
13 morning I'll be fresh and we can do this.

14 **MR. OUELLETTE:** As long as you people keep
15 in mind that the same applies for me.

16 **THE COMMISSIONER:** Absolutely. Thank you.

17 **MR. OUELLETTE:** As I get tired too.

18 **THE COMMISSIONER:** All right. Thank you.

19 **THE REGISTRAR:** Order; all rise. À l'ordre;
20 veuillez vous lever.

21 --- Upon recessing at 4:34 p.m./

22 L'audience est suspendue à 16h34

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C E R T I F I C A T I O N

I, Marc Demers a certified court reporter inthe Province of Ontario, hereby certify the foregoing pages to be an accurate transcription of my notes/records to the best of my skill and ability, and I so swear.

Je, Marc Demers, un sténographe officiel dans la province de l'Ontario, certifie que les pages ci-hautes sont une transcription conforme de mes notes/enregistrements au meilleur de mes capacités, et je le jure.



Marc Demers, CVR-CM