

**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 128

Held at :

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

Tuesday, August 21, 2007

Tenue à:

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

Mardi, le 21 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 9:37 a.m./

2 L'audience débute à 9h37

3 **THE REGISTRAR:** This hearing of the Cornwall
4 Public Inquiry is now in session. The Honourable Mr.
5 Justice Normand Glaude, Commissioner, presiding.

6 Please be seated. Veuillez vous asseoir.

7 **THE COMMISSIONER:** Thank you.

8 Morning all.

9 Good morning, Mr. Ouellette. How are you
10 doing today?

11 **MR. OUELLETTE:** I'm a little tired.

12 **THE COMMISSIONER:** Well, we'll have some
13 questions for you today and hopefully we'll have you all
14 finished up by the end of the day.

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

16 ---EXAMINATION IN-CHIEF BY/CONTRE-INTERROGATOIRE PAR MR.
17 DUMAIS (Cont'd/Suite):

18 **MR. DUMAIS:** Good morning, Keith.

19 **MR. OUELLETTE:** Good morning.

20 **MR. DUMAIS:** I'm going to go back a bit and
21 try to put you back where we were when we left off
22 yesterday.

23 So we had just finished discussing the
24 statement dated November 24th, 2000 that you had given to
25 Constable Pare of the Cornwall Community Police.

1 I just finished off by saying that at one
2 point in time the file would have been transferred to a
3 further investigator and that person would have contacted
4 you.

5 So do you know off-hand who else would have
6 contacted you to make a statement with respect to your
7 allegation about Richard Ouellette?

8 **MR. OUELLETTE:** I'm not sure about her
9 second name. She's either part Native American or totally
10 Native American. I believe her first name to be Emma --
11 something similar to that.

12 **MR. DUMAIS:** All right.

13 **MR. OUELLETTE:** But she had a double name,
14 her own name ---

15 **THE COMMISSIONER:** Can we suggest a name to
16 him then?

17 **MR. DUMAIS:** Her name is Emma Wilson-King.

18 **MR. OUELLETTE:** Yes ---

19 **MR. DUMAIS:** Does that ring a bell to you?

20 **MR. OUELLETTE:** --- that's very familiar.

21 **MR. DUMAIS:** Okay. So then you made a
22 statement initially to Constable Pare at the end of 2000.
23 At the beginning of February, Ms. Emma Wilson-King would
24 have contacted you. Do you recall such a conversation?

25 **MR. OUELLETTE:** Yes.

1 **MR. DUMAIS:** And after the conversation and
2 meeting was set up and presumably you went to the Cornwall
3 Police station to make a further statement. Do you recall
4 that?

5 **MR. OUELLETTE:** Could you repeat that again,
6 please? It's early.

7 **MR. DUMAIS:** Yes, that's fine.

8 So Constable Emma Wilson-King contacted you
9 and the intent was to set up a meeting so that she could do
10 a further interview with you?

11 **MR. OUELLETTE:** Yes, audio and video
12 interview at the police station.

13 **MR. DUMAIS:** All right.

14 So I don't have -- I do have a copy of the
15 video but I don't have a copy of the transcript. I do have
16 a copy of the summary and perhaps this can help refresh
17 your memory, Keith, and that's at document 737511.

18 **THE COMMISSIONER:** Thank you.

19 Exhibit 590 is a supplementary report dated
20 the 24th of November 2000.

21 **---EXHIBIT NO./ PIÈCE NO P-590:**

22 (737511) Supplementary Report re: Keith
23 Ouellette dated February 1, 2001

24 **MR. DUMAIS:** Just so you know, Keith, this
25 supplementary report is not necessarily something that you

1 would have seen before, but it's a report that's prepared
2 by the officer and filed with their services.

3 And it's in no way a summary of your entire
4 statement, but I'll just read out her notes on your
5 interview:

6 "On February 1st, 2001 the victim
7 Kenneth Keith Ouellette attended
8 [headquarters] HQ and at 12:35 hours a
9 taped interview was conducted. During
10 this interview, Ouellette disclosed an
11 instance in which he alleges his older
12 brother Richard Ouellette sexually
13 assaulted him between the ages of 5
14 through to age 11. Also during this
15 interview, Ouellette reported that he
16 was a victim of numerous sexual
17 assaults involving government
18 personnel, Ken Seguin, his probation
19 officer and unknown persons while he
20 was incarcerated in Brampton when he
21 was a YO. He also stated he did not
22 wish to proceed with criminal charges
23 due to the fact that he didn't feel
24 that he was going to be around at a
25 trial if a trial were to proceed. He

1 went on to explain that he is very ill
2 with numerous illnesses."

3 I guess my first question to you, Keith, is
4 do you recall the statement with respect to you not wishing
5 to proceed due to the fact that you were ill and you may
6 not be there for a trial?

7 **MR. OUELLETTE:** It's possible I might have
8 mentioned something like that, but I also mentioned that I
9 wish I could proceed. I believe at the time my mother was
10 still alive.

11 **MR. DUMAIS:** Yes.

12 **MR. OUELLETTE:** It's possible that she was,
13 like, in the process of dying and she wasn't coherent so I
14 believed her to be on her death bed. And it may have been
15 at that time, but it's possible she was already dead. But
16 to answer the question, it wasn't in Brampton by the way,
17 it was in Guelph ---

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

19 **MR. OUELLETTE:** --- that that occurrence
20 occurred. So again there's a discrepancy there.

21 **MR. DUMAIS:** Okay.

22 **MR. OUELLETTE:** In my statement I mean.
23 And ---

24 **MR. DUMAIS:** Incidentally, Keith, what
25 illness was your mother suffering from?

1 **MR. OUELLETTE:** Diabetes, heart problems and
2 other associated problems from the effects of being poor
3 over a very long time and ---

4 **MR. DUMAIS:** Did she suffer from Alzheimer's
5 disease?

6 **MR. OUELLETTE:** At the very end I think
7 maybe dementia or Alzheimer's.

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

9 Now, do you recall if you had any further
10 contacts with this Constable Emma Wilson-King afterwards?

11 **MR. OUELLETTE:** Yes. I wasn't very happy
12 with what was happening because just prior to that there
13 was a Shelley -- the prosecutor, a Shelley -- somebody
14 Shelley -- who ---

15 **MR. DUMAIS:** Shelley Hallett?

16 **MR. OUELLETTE:** M'hm. And just about that
17 time period I had reported a case of sexual molestation by
18 the maternal grandfather to the CAS and they -- I tried to
19 have him prosecuted. I lost custodial and visitation
20 rights while he had limited access under supervision for 18
21 months. And I got pretty upset over that because I thought
22 it was unfair. And so it's about the time period when this
23 also was happening and I approached Emma -- somebody King -
24 --

25 **MR. DUMAIS:** Yes.

1 **MR. OUELLETTE:** --- and she called me a
2 liar. She said that she had interviewed the nine boys that
3 I had identified by name. And normally I don't always
4 recall names, but the fact that it was burned in my memory
5 means that it happened; it's an event that happened and it
6 scarred me. And I went on to describe their genitalia and
7 that was totally ignored ---

8 **MR. DUMAIS:** All right.

9 **MR. OUELLETTE:** --- by the police
10 department.

11 **MR. DUMAIS:** After you initially made the
12 statement, were you under the impression that the matter
13 would be investigated or that ---

14 **MR. OUELLETTE:** No, she called me a liar to
15 my face.

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

17 **MR. OUELLETTE:** Which was adding insult to
18 injury because I had already presented to her the letters
19 to the CAS and from Dr. Khan and from other various
20 sources.

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

22 So you thought she disbelieved you?

23 **MR. OUELLETTE:** I thought there's definitely
24 something happening here to conspire against me pursuing
25 happiness and having the security of my home under the

1 Charter of Rights.

2 MR. DUMAIS: All right.

3 If we can just have a look at document
4 number 200150.

5 THE COMMISSIONER: Exhibit 591 is notes from
6 -- handwritten notes of Emma Wilson-King, Book Number 2, it
7 says.

8 MR. DUMAIS: That's correct, Commissioner.

9 --- EXHIBIT NO./PIÈCE NO. P-591:

10 (200150) Cornwall Police Services, Emma
11 Wilson-King, officer's notes re: Keith
12 Ouellette dated February, 2001

13 THE COMMISSIONER: So, Mr. Ouellette, these
14 are notes that a police officer makes during an
15 investigation, I guess. And so they're subject to proof,
16 but Mr. Dumais is going to use them to ask you some
17 questions.

18 MR. DUMAIS: Yes. And again, Keith, these
19 are not documents that you would have seen and
20 unfortunately, Commissioner, I do not have Bates pages for
21 this document, but if I start at the first page, I'd like
22 you to turn to the sixth page of that package and, more
23 specifically, I'm looking at the last three lines on that
24 page, right under Thursday, February 8th, 2001.

25 THE COMMISSIONER: Do you have the right

1 page, Madam Clerk? Yes. A little lower, right? That's
2 it. Right there. Thank you.

3 Hang on, Madam Clerk. Could you make sure
4 the witness knows where it is?

5 I believe that's it, Mr. -- at the bottom, I
6 think. Mr. Ouellette, the three last -- there you go.

7 **MR. OUELLETTE:** Okay. Thanks.

8 **MR. DUMAIS:** All right.

9 So you gave your statement on February 1st,
10 2001 and from what is noted in her notebook, it appears
11 that a phone call or a conversation was struck with you on
12 February 8th, 2001 at 900 hours. So I'll just read out
13 loud, and you can tell me whether or not you remember this
14 conversation afterwards, Keith:

15 "Spoke to Kenneth Ouellette on phone,
16 advised him that the investigation was
17 complete due to the fact that he wished
18 no criminal action taken and everyone
19 spoken to denies the allegation.

20 Ouellette became upset, yelling at the
21 phone, now accusing half the town of
22 Cornwall wanting to abuse him or that
23 he had been abused reports, has in his
24 possession a picture in which he
25 believes would prove his allegation

1 because he's sad and folding his
2 arm...will advise...no further action will
3 be taken by myself."

4 Do you recall that conversation with the
5 constable and do you recall saying that to her?

6 **MR. OUELLETTE:** It's possible I got very
7 upset with her. I'm sure I did. I think the reason why I
8 was getting upset is that because no charges were being
9 laid.

10 **THE COMMISSIONER:** Okay.

11 **MR. OUELLETTE:** And/or it wasn't as much lay
12 a charge as to make it public because he was a public
13 offender. He's a -- he was -- he may not be now, but he
14 was an offender and a perpetrator against my person.
15 That's an assault.

16 **MR. DUMAIS:** So you had concerns about
17 safety of the public at large. Is that fair?

18 **MR. OUELLETTE:** Yes.

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

20 And then according to the notes, you would
21 have called back -- and I'm looking at the entry on
22 February 9th, 2001:

23 "At 800 hours, received phone call from
24 Kenneth-Keith Ouellette, expressed his
25 anger about his allegations involving

1 his brother not proceeding. Tried to
2 explain to him I have doubt and his
3 witnesses don't support his
4 allegations."

5 Do you recall calling her back?

6 **MR. OUELLETTE:** Yes, which, again, I have to
7 state for the record that the reason why I phoned is
8 because I wasn't happy with their decision not to charge
9 him, because by then, you know, you can -- I'm like a
10 rollercoaster emotionally and my moods change quite
11 drastically, and I make decisions quite impulsively.
12 Therefore, I changed my mind and I wanted him charged and I
13 wanted him brought to justice for what he had done, only
14 for the apology and only for closure.

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

16 So is it fair to say, Keith, that at
17 different times you were -- you had different feelings
18 about proceeding or not against -- with this allegation,
19 but at that point in time ---

20 **MR. OUELLETTE:** Well, he's family even
21 though he's an adoptive brother. I was raised with him.
22 Just as a child would have affection for an abusive parent
23 because he's dependent emotionally on him or her is the
24 same scenario that was happening because I didn't want to
25 hurt my parents. I didn't want to hurt anybody in general,

1 including my brother. I just wanted him to get help.

2 When I had a conversation with him in
3 Applehill, he refused to get help. He refused to admit
4 that he made a mistake, and that's when I made the
5 decision, "This guy is going to continue to do what he
6 does".

7 MR. DUMAIS: Right.

8 MR. OUELLETTE: So if he's not seeking help,
9 I have to help him.

10 MR. DUMAIS: All right.

11 Now, that's the last entry that we have for
12 Constable Wilson-King's involvement with you with respect
13 to this allegation.

14 Do you know if anything else happened after
15 you made that phone call?

16 MR. OUELLETTE: I'm not sure.

17 MR. DUMAIS: Okay. Now, Keith, I understand
18 that at different points in time you did have some contacts
19 with a gentleman by the name of Dick Nadeau. Is that
20 correct?

21 MR. OUELLETTE: Yes.

22 MR. DUMAIS: And can you tell us about that,
23 how you came to meet with him and what type of relationship
24 you had?

25 MR. OUELLETTE: His common-law wife, I used

1 to baby-sit her younger brother, and I met her through my
2 middle brother, Robert. So I used to baby-sit quite
3 frequently and her boyfriend -- or she was seeing Dick
4 Nadeau at the time. So I met him periodically like that,
5 but I had no idea who he was. He was selling cars or
6 something for a living.

7 So at a later time, much later time, after
8 Project Truth had already been underway, unaware to me
9 because I was in the country and I didn't pick up the paper
10 or anything, after Perry Dunlop had tried to get in touch
11 with me, because I didn't trust the Cornwall Police, I
12 tried to make meetings with him or he tried to initiate
13 meetings with me in restaurants, in public places because I
14 insisted they be public.

15 After about -- I don't know -- a month or
16 something, I got a phone call from Dick Nadeau out of the
17 past and out of the blue, and that's how I reconnected with
18 Dick Nadeau. And when I saw what he was into and what it
19 was about, like he was running a website, I realized that
20 Perry Dunlop was legitimate and that he was one of the non-
21 crooked cops who did have a heart, who did care and tried
22 to make a difference.

23 So all of a sudden I decided maybe I should
24 talk to this guy and I started to talk to Dick Nadeau about
25 how I could get to meet him and then get involved in

1 showing the community what is actually happening in this
2 town.

3 **MR. DUMAIS:** Now, you spoke about Mr.
4 Nadeau's website. Did you have any involvement or
5 contribute any statements to the website?

6 **MR. OUELLETTE:** Just my impact statement and
7 general information that -- as a consequence of Ken
8 Seguin's revoking my parole and/or probation. I'm not sure
9 which because I was on both and on several occasions. So
10 they kind of like overlapped and I'm not sure which one was
11 what, but I do know what happened to me as a consequence.
12 It's not -- dates are not that important. It's the event
13 that's important.

14 **MR. DUMAIS:** All right.
15 So you did provide some materials?

16 **MR. OUELLETTE:** Yes, a few, and he was
17 integral in having me get a lot of documentation from the
18 government through people he knew, like the Summerville
19 Report, which is experimentation on prisoners.

20 **MR. DUMAIS:** So there was a sharing of
21 information between the two of you?

22 **MR. OUELLETTE:** Yes.

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

24 **MR. OUELLETTE:** He was assisting me in
25 gathering information because the police, whom I have

1 approached and the Attorney General's Office who I
2 approached -- you see, when you're accused of something
3 they don't hesitate to find something to criticize you
4 about, but no one knows in the general public that there is
5 nobody out there to serve the innocent person's interests
6 in proving that he is innocent, and if they put him away
7 and he's on bail hearing and he doesn't get out, how can he
8 prove his innocence?

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

10 Now, you just mentioned that Dick Nadeau
11 played some sort of a role in making contact with Perry
12 Dunlop. Can you tell us about that and what involvement
13 you had with Perry Dunlop?

14 **MR. OUELLETTE:** I have met Perry Dunlop at
15 the very end of all his troubles just prior to him moving
16 to Vancouver. When that happened, I was introduced to his
17 wife, Helen, whom I had no clue had gone to General Vanier
18 with me but she knew me and everybody knew me back then,
19 but I don't, you know, remember names. I just remembered
20 the faces because we didn't have names. We had nicknames,
21 and that was the fad.

22 So Dick Nadeau brought me over to say
23 goodbye to Perry Dunlop, to thank him also for all the
24 effort he had put in, in bringing this information forward
25 and at least trying to make a difference before he was

1 threatened and his daughter was threatened and he was
2 forced to move to as far as he could get from Cornwall.

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

4 So you -- and that was the only time that
5 you met him; is that what you're saying?

6 **MR. OUELLETTE:** I think I met with him
7 twice, not more than twice.

8 **MR. DUMAIS:** And on this particular -- this
9 particular meeting he is about to move away. Is that
10 correct?

11 **MR. OUELLETTE:** He was packing his boxes in
12 his basement and his sons were helping.

13 **MR. DUMAIS:** Okay. Now, you indicated that
14 ---

15 **MR. OUELLETTE:** Males were helping. I'm not
16 sure if they were sons.

17 **MR. DUMAIS:** Had he tried to make contact
18 with you prior to them?

19 **MR. OUELLETTE:** Yes, on many occasions, on
20 at least five, six occasions.

21 **MR. DUMAIS:** I see. Tell us about that.

22 **MR. OUELLETTE:** Well, as I said, by then I
23 had already been threatened by the police department. I
24 was in fear for my life for real and I would get a lot of
25 harassment. I'd get picked up a lot by the police for

1 arbitrary things, nothing really serious, and just
2 basically harassed and threatened with arrest and, you
3 know, just intimidated.

4 So when he phoned me -- one day I got a
5 phone call from Perry Dunlop at home in Apple Hill and he
6 offered to meet me at a restaurant. So I said okay, I'd
7 meet him which I didn't go to. I didn't give him any
8 warning that I wasn't going to attend. I was very afraid.
9 I thought there was a setup. I thought it was going to be
10 like before but this time that they were really actually
11 going to kill me. So I was very afraid for my life and I
12 didn't know.

13 So then he phones me a little while after --
14 I'm not too sure how long after -- and, again, same
15 scenario and again the same scenario, like five times like
16 that.

17 **MR. DUMAIS:** So you would never show up at
18 the meetings?

19 **MR. OUELLETTE:** I wouldn't go. I was very
20 afraid for my life. And he used to try to reassure me. He
21 said, "I only want to talk about, you know, your probation
22 officer". He didn't get into specifics. He didn't want to
23 -- he wanted to hear it from me. He didn't want to, like,
24 as I said yesterday, pollute my testimony or my deposition.
25 He didn't want to alter it.

1 **MR. DUMAIS:** Is it fair to say that he was
2 primarily interested with your allegation against Ken
3 Seguin?

4 **MR. OUELLETTE:** He wanted to know the facts
5 of what happened.

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

7 But was he primarily interested with your
8 allegations against Ken Seguin?

9 **MR. OUELLETTE:** Yes, very.

10 **MR. DUMAIS:** Did you actually ever meet with
11 him and have that discussion?

12 **MR. OUELLETTE:** Only in his basement.

13 **MR. DUMAIS:** You mean the last time you saw
14 him right before you left?

15 **MR. OUELLETTE:** Yes.

16 **MR. DUMAIS:** That's when you had the meeting
17 with him?

18 **MR. OUELLETTE:** Yes.

19 **MR. DUMAIS:** And you would have told him
20 about your allegation against Ken Seguin. Is that correct?

21 **MR. OUELLETTE:** Yes. Well, we -- by then
22 the OPP had already approached me. I was heavily involved
23 with the OPP investigation. By then I had demonstrated --
24 I went to the Attorney General's office and tried to make a
25 political -- you know some kind of political statement by

1 dramatically and theatrically giving my opinion, which is
2 my right I think.

3 **MR. DUMAIS:** You were voicing your
4 objections?

5 **MR. OUELLETTE:** Yes.

6 **MR. DUMAIS:** Yes, all right.

7 **MR. OUELLETTE:** Strongly.

8 **MR. DUMAIS:** So during that meeting with
9 Perry Dunlop, did you provide him with a statement? Did
10 you provide him with information? Did he take down notes,
11 I guess, from you?

12 **MR. OUELLETTE:** I'm not sure if he did, but
13 at the time the Citizens for Renewal, and there was another
14 committee; Dick Nadeau, myself, Francine Gobeil, Marc
15 Carriere, we all tried to get together to try to form some
16 -- you know like Carson Chisholm.

17 That's where I met all these people at these
18 meetings, where we were trying to bring an inquiry to
19 Cornwall and force the government to take a look at what
20 was happening here because obviously we weren't being
21 listened to for 15, 30 years.

22 **MR. DUMAIS:** So you were part of this group
23 then?

24 **MR. OUELLETTE:** Yes.

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

1 And so at the last meeting -- just so that
2 we can finish off with Mr. Dunlop -- did he provide you
3 with any information at that time?

4 **MR. OUELLETTE:** Not really. He was more of
5 a gatherer. Police don't volunteer information. They
6 gather information.

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

8 Now, you mentioned that you became involved
9 with this group and you met up with a gentleman by the name
10 of Carson Chisholm. Can you tell us what was your
11 involvement with him?

12 **MR. OUELLETTE:** Oh, very superficial --
13 well, not superficial and shallow in the sense of that
14 meaning, but very -- just like acquaintance-wise and just
15 you know, friendly.

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

17 So you mentioned at different times during
18 your evidence, Keith, that you had dealings with the
19 Ministry of the Attorney General or the Crown Attorney's
20 office and you mentioned the name of someone named Shelley.
21 Can you tell us what involvement you had with her?

22 **MR. OUELLETTE:** Well, my children had been -
23 - I reported cases of sexual ---

24 **MR. DUMAIS:** Okay. So Shelley dealt with
25 the situation involving ---

1 **MR. OUELLETTE:** She was also a prosecutor
2 for a lot of the things that -- I was -- I phoned once to
3 another threat charge. I had five threat charges levied
4 against me and at the time I had a prescription for
5 marijuana and I was growing that. So when they arrested me
6 for that they also arrested me for growing marijuana even
7 though it was public knowledge that -- and OPP official
8 knowledge that I had ---

9 **MR. DUMAIS:** An exemption.

10 **MR. OUELLETTE:** --- an exemption. And so
11 that was taken from me. I was arrested promptly. I was
12 told that I had threatened Bob Kilger and John Cleary and
13 my children and that was the reason why they took me and my
14 kids away and put me away with pedophiles.

15 **MR. DUMAIS:** You spoke to Shelley?

16 **MR. OUELLETTE:** And I was then exonerated
17 from all of the charges completely and she apologized for
18 not laying any charges. Well, they did lay charges, but
19 they seemed to have dropped them against the grandfather
20 who perpetrated this crime against my child even though he
21 already had a previous record.

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

23 **MR. OUELLETTE:** And they argued with me that
24 they didn't have a record and Shelley was the prosecutor.
25 She also at another time called me a time bomb and I had

1 been prosecuted, sir, and went to jail ---

2 **MR. DUMAIS:** All right.

3 **MR. OUELLETTE:** --- many times for things I
4 have done and things I haven't done.

5 **MR. DUMAIS:** All right, Keith. I guess --
6 let me rephrase my question.

7 Did you speak to her about your specific
8 allegations, where you were to ---

9 **MR. OUELLETTE:** I spoke -- I believe she was
10 there when Emma -- she may have been there when Emma was
11 walking away from me and as I objected and tried to -- I'm
12 in the courthouse, I have to be, you know, a little passive
13 -- so I'm trying to politely get her attention, but at the
14 same time I'm frustrated with the whole system and how they
15 are treating me because I am concerned for my children's
16 welfare here. So it bothers me as a parent. And so I'm
17 making a point of calling out for her and she turned around
18 and said, "As far as we are concerned, you're" -- and I do
19 believe she said, "You're a fucking liar".

20 **MR. DUMAIS:** Who said that?

21 **MR. OUELLETTE:** Emma whatever King.

22 **THE COMMISSIONER:** We are trying to focus on
23 Shelly Hallett now.

24 **MR. OUELLETTE:** Oh, well, she just said,
25 "Well, we are not going to continue with laying charges

1 against Oscar St.-Denis because he is old and he is sick
2 and he is going to die anyway", and ---

3 MR. DUMAIS: But, Keith ---

4 MR. OUELLETTE: --- he gets access at
5 Christmas ---

6 MR. DUMAIS: Hang on, Keith ---

7 MR. OUELLETTE: --- while I am denied it.

8 MR. DUMAIS: Just a second, Keith.

9 So my question was what involvement you have
10 with Shelley, if any, with respect to your specific
11 allegations?

12 MR. OUELLETTE: Against Ken Seguin or
13 anything else?

14 MR. DUMAIS: Yes.

15 MR. OUELLETTE: I don't think any.

16 MR. DUMAIS: All right.

17 MR. OUELLETTE: I did mention, I think I
18 mentioned it, I might have mentioned it to her that these
19 things happened to me.

20 MR. DUMAIS: Yes.

21 MR. OUELLETTE: Because I had visited the
22 Attorney General's office at least on ---

23 MR. DUMAIS: So you had -- hang on, Keith --

24 -

25 MR. OUELLETTE: --- five occasions.

1 **MR. DUMAIS:** Just a sec, all right?

2 So if I can just take you back a bit. So
3 you don't think you had any contact with Shelly other than
4 perhaps an off-the-hand conversation. Is that a fair
5 statement?

6 **MR. OUELLETTE:** An off-the-record, probably,
7 conversation. Yes. It's possible.

8 **MR. DUMAIS:** All right. Any other dealings
9 with the Crown Attorney's office? Anyone else?

10 **MR. OUELLETTE:** A little short man, dark --
11 I don't know his name -- dark complexion, shorter than me.
12 Maybe, I don't know, five-foot-four, five-foot-six. A
13 little stocky.

14 **MR. DUMAIS:** Dealing with your allegations?

15 **MR. OUELLETTE:** Yes. Right at their office.
16 In fact, it took a few officers to take me away from there.
17 I made a big stink.

18 **MR. DUMAIS:** But -- all right, Keith.

19 **MR. OUELLETTE:** I like to make a big stink.

20 **MR. DUMAIS:** But sometime -- I mean, at that
21 particular time, were you meeting with someone from the
22 Crown's office to discuss your specific allegations of
23 abuse?

24 **MR. OUELLETTE:** Yes. I tried to. I was
25 denied the right to. I was told -- I kept stating stuff

1 out of the Constitution that is supposed to be enshrined
2 and honoured.

3 MR. DUMAIS: Yes.

4 MR. OUELLETTE: And kept. So that was
5 denied me. My right to legal redress and address was
6 denied me. My right to legal counsel was denied me.

7 THE COMMISSIONER: Sir ---

8 MR. OUELLETTE: I asked ---

9 THE COMMISSIONER: We are going to ask you
10 to focus on that question. The little, short, stocky guy -
11 --

12 MR. OUELLETTE: Yes?

13 THE COMMISSIONER: Did you actually ever
14 talk to him about your allegations vis-à-vis Ken Seguin,
15 your brother or anybody else?

16 MR. OUELLETTE: I'm pretty sure that I have,
17 yes.

18 THE COMMISSIONER: Okay. And if you did,
19 what did you tell him?

20 MR. OUELLETTE: I told him about Ken Seguin
21 and how -- and what resulted as a consequence of dealing
22 with Ken Seguin's --- I told him that because I refused to
23 give fellatio to Ken Seguin that I was incarcerated and
24 then subjected to cruel and unusual punishment.

25 THE COMMISSIONER: All right.

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

2 We heard through your evidence yesterday,
3 Keith, that you did at one point in time make an
4 application with the Criminal Injuries Compensation Board?

5 **MR. OUELLETTE:** Yes.

6 **MR. DUMAIS:** And do you recall who filled
7 out that application or who assisted you in filing those
8 documents?

9 **MR. OUELLETTE:** I'm not certain, but I think
10 Francine Gobeil helped me to gather some information. At
11 the time -- I wear glasses -- and at the time, I had just
12 received some kind of an injury to my eye and I couldn't
13 see very well. So some people had to help me fill out
14 paperwork.

15 **MR. DUMAIS:** Right. So Francine helped you?

16 **MR. OUELLETTE:** And just as she had to point
17 out stuff to me, is the same thing, I have a hard time
18 finding stuff, so I am sure somebody must have assisted me
19 in filling it in.

20 **MR. DUMAIS:** Okay. So you can remember
21 Francine helping you?

22 **MR. OUELLETTE:** And doctors filling out, you
23 know, stuff.

24 **MR. DUMAIS:** All right. Any other
25 involvement? Any police officers helping you or assisting

1 you with the preparation of any documents?

2 **MR. OUELLETTE:** I don't recall that.

3 **MR. DUMAIS:** You don't recall. Okay.

4 Finally, the matter was -- you received
5 compensation from them at one point in time?

6 **MR. OUELLETTE:** They can call it that, yes.

7 **MR. DUMAIS:** You received compensation from
8 them?

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

10 **MR. DUMAIS:** All right. You weren't
11 satisfied with the amount of the compensation?

12 **MR. OUELLETTE:** Not at all.

13 **MR. DUMAIS:** Okay. Do you recall at all
14 whether or not -- what the compensation was for, on which
15 allegation? Do you recall that?

16 **MR. OUELLETTE:** I had made, I believe, six
17 initial complaints of what I know are illegal criminal acts
18 even under international law and only two were dealt with.

19 **MR. DUMAIS:** Okay. Which two?

20 **MR. OUELLETTE:** Ken Seguin and Richard
21 Hickerson.

22 **MR. DUMAIS:** Okay. Now, Keith, I think we
23 are done with the questions I wanted to put to you and, as
24 I have indicated, you would be provided with an opportunity
25 to deal with two issues at the end of your examination in-

1 chief.

2 The first one would be any recommendations
3 that you may have for the Commissioner or the Inquiry and -
4 --

5 **MR. OUELLETTE:** With the what?

6 **MR. DUMAIS:** The Inquiry.

7 **MR. OUELLETTE:** Yes.

8 **MR. DUMAIS:** For the Commissioner or the
9 Inquiry ---

10 **MR. OUELLETTE:** Yes.

11 **MR. DUMAIS:** --- that they could take into
12 consideration.

13 And the second point you may talk about is
14 how your having been abused and your dealing with the
15 institutions over the years has personally affected you.

16 So do you wish to say anything at this point
17 in time?

18 **MR. OUELLETTE:** Do I say this before cross-
19 examination?

20 **MR. DUMAIS:** Yes, I think you should.

21 **MR. OUELLETTE:** Of course, my own
22 handwriting, I'd rather have typed it, but I'm not high-
23 tech, that's why I keep shifting this around. It bothers
24 me.

25 I don't think I can go into much detail

1 because it doesn't serve just the sexual abuse issues. My
2 issues go further than that.

3 **THE COMMISSIONER:** Exactly.

4 **MR. OUELLETTE:** And I don't want to bore or
5 distract the Inquiry from their mandate.

6 **THE COMMISSIONER:** Thank you.

7 **MR. OUELLETTE:** But there are unusual
8 circumstances, I think -- I'll just hint at them -- that
9 should be mentioned I think. Yesterday, near the end, I
10 would like to mention that for about 35 minutes, I had to
11 urinate and if I seemed different while I was giving my
12 testimony, it was for those reasons.

13 **THE COMMISSIONER:** Okay.

14 **MR. OUELLETTE:** I am going to try to be
15 composed because this is upsetting.

16 If Ontario and Canada as a whole, as a
17 people, given the opportunity, should smile upon the idea
18 of having a botanical gardens in Cornwall maintained and
19 created by survivors as well as provide a better place of
20 respite to house, feed and care for victims and survivors
21 of sexual abuse and other abuses, I already put forth a
22 plan to that effect Colleen Parrish and to the City of
23 Cornwall, and I challenged them to meet up to their
24 promises of trying to heal and bridge. If you need to
25 bridge, you have to be trusted, and when you betray the

1 trust of the public, it's hard to regain it. You have to
2 earn it.

3 I believe that enough talk and money to hear
4 our stories and our facts, too horrible to be graphic, so
5 horrible as to advise me not to say anything about it to
6 the authorities in response to my situation.

7 I believe that people who've had to repeat
8 themselves for a great number of years, that's the
9 survivors, and denied, through whatever symptoms or
10 conditions which disabled them from their rightful place to
11 speak out, I believe that to be an injustice.

12 These people should be compensated
13 regardless of any prior settlement to make matters right
14 and to make things right. Their lives have been stolen
15 from them. Their childhood has been stolen from them. And
16 I don't speak for myself. I'm speaking for your
17 grandchildren, your children, my children and myself and
18 all the other survivors.

19 How do you say to somebody you've lost
20 everything and everyone important to you over and over and
21 not get believed, be ignored, isolated?

22 Due to abuse, what do you do when you're not
23 believed? I weigh extravagance against poverty and I see a
24 city and a province and a country infected and infested
25 with viruses called denial and ignorance. How does one

1 achieve belief by limiting or by being censored from
2 telling the truth? Omission, is that not a form of deceit?

3 Manipulation to achieve a political means or
4 goal to avoid an embarrassment is critical to maintain
5 order. That's like Nazi state and fascism.

6 When you fabricate facts to discredit, you
7 cannot convince them, but you can confuse them.

8 By creating doubts, as lawyers try to do,
9 practising this is a form of practising deceit and it
10 breeds distrust and mistrust in people.

11 Playing with people's memories, preying on
12 their emotions, taking advantage of people who are
13 innocent, treachery and misinformation is treason, and
14 treason is punishable by death even in a non- -- you know,
15 we don't have capital punishment. Look it up.

16 All I've ever experienced is abuse since I'm
17 18 months old at the hands of society, my parents, because
18 of ignorance, and society because of ignorance. I have to
19 relive this daily. I live alone in a prison.

20 I ask you who threatened whom and whose
21 security? Did I go in anyone's room here or touch your
22 children? Have I put you in prison? Do I or did I make
23 someone feel like this? Did I punish or silence anyone,
24 including myself, from acting out or speaking out? No, I
25 did the opposite. I spoke out and I made a public spectacle

1 of myself purposely to demonstrate and to protest the
2 injustices that I perceived and the threats that I
3 perceived, and it seems to me that when you perceive a
4 threat to be real, it gives you enough reason to have to
5 even, as an example, go to Afghanistan, where we don't even
6 belong, and kill little kids and women in the name of what,
7 democracy?

8 How much does it take? How much more --
9 many more before you wake up?

10 Laws should become severe and swift when a
11 conviction is won. That's if you can actually prove
12 without misinformation and disinformation that the facts
13 are actual and factual. You cannot convict somebody on
14 hearsay and you can't continue to go through a court with
15 misinformation or wrong information and then proceed to
16 sentence and convict somebody to jail, which is what
17 happened to me. That is unlawful.

18 If people are a threat and they're
19 pedophiles, they should be put off the street and they
20 should be kept in jail, just as a serial murderer would be,
21 because that's exactly what they've committed. They've
22 committed murder. They've taken lives.

23 I've been abused and sometimes convicted of
24 things I've done, other things I haven't done, and I went
25 to jail regardless of my innocence. Either way, I felt

1 myself alone. Great incentive for learning to forgive and
2 forget. You go to criminal college and you learn what, how
3 to become worse?

4 Sensory deprivation, torture, mind control
5 experiments, LCD, sodium pentothal, electroshock treatment
6 to my teeth, my testicles and my toes, I was subjected to
7 that treatment. I'm not supposed to talk about it, but I'm
8 going to. That's for refusing to give head to probation
9 officers. I told every psychiatrist and counsellor and
10 hospital in the entire Ontario -- Eastern Ontario region.
11 I was ignored. I continue to be ignored. I cannot get any
12 help.

13 I go to jail for having symptoms from
14 therapies and things that were done to me while I was
15 unconscious and I'm blamed and held accountable by the
16 Cornwall Police Department and other agencies and end up
17 punished for being a victim of crime. I think that's
18 reprehensible.

19 If I feel shame, it's for the fact that
20 society that I live in is an evil one and accepts these
21 crimes as commonplace things and just lets it happen.

22 If I feel blame, I know that I don't own it.

23 If I feel guilt, it's for not trying harder
24 to resist this fascism and take my stand against it and
25 maybe had I made other choices, I wouldn't be here today.

1 Maybe I would have had a better life if I would have given
2 him a blowjob and gone down on him or let him go down on
3 me.

4 I don't understand how you people don't
5 understand that if you are being penetrated, that it
6 affects you for the rest of your life. The rape of a mind
7 is worse than anal rape.

8 I'm trying to make this brief. You want us,
9 as victims and survivors, to trust these institutions that
10 allowed these things to happen to us? You want to bridge,
11 you want to heal this? Well, put up or shut up.

12 This Inquiry spent a lot of public monies.
13 If you used a fraction of that we could have had a
14 botanical gardens. We could have had a Dick Nadeau house
15 for men. We could improve the services, because men that
16 beat up women and have substance abuse issues, well, they
17 come from being sexually molested and/or abused by their
18 mothers, and mothers abuse their children as much as
19 fathers abuse their children and we all come from mothers.

20 My mother gave me up. Women walked away
21 from my life all my life. I've never been able to have any
22 kind of relationship with men or women, still can't. I
23 live in prison.

24 Hospitals are not adequate to treat people
25 like me or like us. Incarceration won't solve the problem

1 when you're a victim of post-traumatic stress disorder and
2 you're misdiagnosed and the prognosis is that you're
3 schizophrenic. You're not credible. You're this, you're
4 that. They label you whatever they want. Did they break
5 bread with you? Did they get to come to your home? Did
6 they get to know you? No. Then they pass judgment on you.
7 And the very book that you wanted me to swear on tells you
8 that it's against one of the Ten Commandments to do that,
9 to bear false witness against your brethren and then put
10 him in jail for it.

11 I've been to anger management. I've been to
12 Mount Carmel. I've done it on my own accord. Nobody had
13 to send me there. I went there for help on my own accord
14 for 35 years. I've sought help since 1973, even 1971 when
15 I first attempted suicide.

16 All I got is treated like a mental patient,
17 got injected with drugs that I was allergic to or hyper-
18 sensitive to that made me become psychotic. People
19 misinterpreted that psychosis and made me look like a
20 criminal. Yes, I associated with the underworld. Yes, I
21 did do drugs. Yes, I sold drugs. But I've never lifted a
22 hand to anybody in my life. And I've been charged with
23 assault, had to plead guilty ---

24 **MR. DUMAIS:** Keith, you have a statement ---

25 **MR. OUELLETTE:** --- to assault.

1 And I just want the population to know that
2 when you start living in a police state and when that
3 police state controls your every move and your every
4 thought and that when you're a victim of crime, instead of
5 listening to you and sending you where you should belong,
6 they put you in jail and make you worse and then continue
7 to do that scenario and threaten your life that it is
8 against the law to do that. And that's more serious than
9 sexual abuse because that's how Hitler took power.

10 That's all I have to say.

11 **THE COMMISSIONER:** All right.

12 Thank you, Mr. Ouellette.

13 **MR. OUELLETTE:** Oh, yes. Build it, be the
14 model, be proud, be free. You can make a difference. You
15 can make a difference. Okay? Or you can ignore it.

16 **MR. DUMAIS:** So, Keith ---

17 **MR. OUELLETTE:** I'm sorry for my outburst.

18 **THE COMMISSIONER:** No, no. I understand.
19 Your points will be considered.

20 Is it time for a break?

21 **MR. DUMAIS:** Yes. Perhaps if I can just
22 finish off then and we can take a short break before
23 starting.

24 So, Keith, I understand that you are
25 involved with the other -- with Phase II of the Inquiry and

1 that you've put different proposed ideas to them and that
2 you're participating in that. Is that correct?

3 MR. OUELLETTE: I'm just wondering why it's
4 taking 15 years for it when ---

5 MR. DUMAIS: So you're ---

6 MR. OUELLETTE: --- it's been known for 40
7 years, 50 years, that this problem's been happening.

8 MR. DUMAIS: So you're involved in that?

9 MR. OUELLETTE: It's been buried and no one
10 does anything. In fact, there is not even a sexual abuse
11 pamphlet at the City of Cornwall. They've known about
12 Project Truth for 15 years. You would think there would be
13 a sexual abuse pamphlet.

14 MR. DUMAIS: All right.

15 So you're involved in that part, Keith?

16 MR. OUELLETTE: Well, I try to be ---

17 MR. DUMAIS: All right.

18 MR. OUELLETTE: --- outspoken and I want
19 people to be aware. It's a form of protest, sir. It's a
20 polite form of protest and I'm trying to avoid being
21 obnoxious, aggressive, belligerent, or whatever.

22 But I want the people of Cornwall and the
23 public of Ontario and even the public all over the world to
24 know that it's not just an isolated Cornwall case. It's
25 not just a matter -- it's people making mistakes and having

1 misunderstandings and it's not a blame but it is a shame
2 and a pity that it happened.

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

4 So, Keith, we're going to take a short break
5 and some of the parties are going to have some questions
6 for you as well.

7 **MR. OUELLETTE:** I'm glad to entertain.

8 **MR. DUMAIS:** All right.

9 Thank you.

10 **THE COMMISSIONER:** Thank you.

11 Let's take a short break.

12 **THE REGISTRAR:** Order. All rise. À

13 l'ordre. Veuillez vous lever.

14 --- Upon recessing at 10:33 a.m./

15 L'audience est suspendue à 10h33

16 --- Upon resuming at 10:56 a.m./

17 L'audience est reprise à 10h56

18 **THE REGISTRAR:** The hearing is now resumed.

19 Please be seated. Veuillez vous asseoir.

20 **THE COMMISSIONER:** Thank you.

21 Mr. Manson.

22 **MR. MANSON:** Good morning, Mr. Commissioner.

23 **THE COMMISSIONER:** Good morning, sir.

24 ---CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR MR.

25 **MANSON:**

1 **MR. MANSON:** Mr. Ouellette, my name is Allan
2 Manson and I'm one of the lawyers for the Citizens for
3 Community Renewal, which is a group of Cornwall citizens
4 concerned about institutional reform and especially the
5 protection of children. I have very few questions for you.

6 But before then, Mr. Commissioner, I have an
7 announcement for counsel.

8 **THE COMMISSIONER:** Really?

9 **MR. MANSON:** I have a message to convey from
10 Ms. McArthur.

11 **THE COMMISSIONER:** Right. Okay.

12 **MR. MANSON:** I'll speak to you but it's for
13 counsel.

14 You'll recall last week there was a few
15 minutes of a videotape that we didn't see?

16 **THE COMMISSIONER:** Yes.

17 **MR. MANSON:** Ms. McArthur will arrange to
18 have it shown in the hearing room during the lunch break.

19 I'm going to watch it and if any other
20 counsel want to see it, that would be an opportunity. I
21 don't know if there are other opportunities but I'm going
22 to be watching it.

23 **THE COMMISSIONER:** Terrific. Thank you.

24 **MR. MANSON:** Mr. Ouellette, you were very
25 articulate a few minutes ago and I know you've written

1 poetry in the past. I've read some of your poetry. Are
2 you still writing poetry?

3 MR. OUELLETTE: I just cut an album.

4 MR. MANSON: Oh. Is it music or poems?

5 MR. OUELLETTE: Well, it's the same -- at
6 the time that I wrote that poetry there was really music
7 and it was aborted after I was in prison and I was no
8 longer able to play guitar or recall my adoptive parents
9 when I got out. I was like a baby.

10 MR. MANSON: Are you painting still?

11 MR. OUELLETTE: Yes, I try. Everything I do
12 is sabotaged by myself due to the conditioning.

13 MR. MANSON: Can I just -- Mr. Commissioner,
14 I want to fill in a little gap in the story. And, Mr.
15 Ouellette, I understand what you've been saying about
16 diagnosis and misdiagnosis.

17 Are you currently on any medication?

18 MR. OUELLETTE: Valiums. I've been on
19 SSR's, which is like Paxil and ---

20 MR. MANSON: SSRI's.

21 MR. OUELLETTE: Yes.

22 MR. MANSON: Secondary serotonin reuptake
23 inhibitors.

24 MR. OUELLETTE: I've applied for
25 compassionate and humanitarian application to have LSD

1 treatment offshore on a boat and I will gain treatment to
2 mimic the original abuses that happened while I was
3 incarcerated, to reverse ---

4 MR. MANSON: Can I just slow you down for a
5 minute? You mentioned Paxil?

6 MR. OUELLETTE: Yes.

7 MR. MANSON: Which is an SSRI. And I ---

8 MR. OUELLETTE: They aggravate -- most of
9 the drugs I've have been prescribed change the chemistry of
10 the brain, you see, and if you're not mentally ill it makes
11 you mentally ill.

12 MR. MANSON: Would you agree that that
13 particular drug is usually prescribed to deal with mood and
14 anxiety?

15 MR. OUELLETTE: Yes.

16 MR. MANSON: I want to put something to you,
17 and I apologize because I do understand what you're saying
18 about diagnosis and misdiagnosis, but I think it fills some
19 of the historical record. Yesterday, Mr. Dumais showed you
20 the report from Dr. Khan, 1994, that was sent December 8th,
21 1994. This is Exhibit 580, Mr. Commissioner.

22 THE COMMISSIONER: Yes.

23 MR. MANSON: And it was sent to Dr.
24 Laferriere.

25 MR. OUELLETTE: Yes.

1 **MR. MANSON:** He was your GP?

2 **MR. OUELLETTE:** He was my general
3 practitioner, M.D., yes.

4 **MR. MANSON:** I found late last night a
5 document and I believe, Mr. Commissioner, notice was served
6 by the Cornwall Police of this document.

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

8 **MR. MANSON:** It's 713795. It's from Dr.
9 Laferriere and just before we show it to you it would have
10 been written September 26, 1994 shortly after you were
11 involved -- well, almost a year -- six months after you
12 were involved in a motor vehicle accident.

13 **MR. OUELLETTE:** Yes.

14 **MR. MANSON:** Do you recall that in '93?

15 **MR. OUELLETTE:** Yes.

16 **MR. MANSON:** If we could make this an
17 exhibit, Mr. Commissioner?

18 **THE COMMISSIONER:** Exhibit 592, letter dated
19 September 26, 1994 from Dr. Gilles Laferriere to Whom it
20 May Concern.

21 **--- EXHIBIT NO./PIÈCE NO. P-592:**

22 (713795) Letter from Dr. Gilles Laferriere
23 to Whom it May Concern re: Keith Ouellette
24 dated September 26, 1994

25 **MR. MANSON:** It's only addressed to "Whom it

1 May Concern", and I'm only concerned to read to you, Mr.
2 Ouellette, the second paragraph on the first page.

3 MR. OUELLETTE: M'hm.

4 MR. MANSON: And ask you whether you have
5 seen that. Let me read ---

6 MR. OUELLETTE: Yes, I have. I'm the one
7 who requested that he write the letter.

8 MR. MANSON: Was it for insurance purposes
9 because of the way ---

10 MR. OUELLETTE: It was for insurance
11 purposes.

12 MR. MANSON: Let me just read that
13 paragraph:

14 "I have known Mr. Ouellette since March
15 13th, 1989. He has a long history of a
16 schizoaffective disorder that has been
17 described by various doctors as bipolar
18 affective disorder or manic-depressive
19 psychosis. His psychiatric condition
20 has been difficult to categorize but is
21 quite severe and has caused him to be
22 unable to do gainful employment for
23 several years and he has therefore been
24 on a disability pension for several
25 years. But he manages to look after

1 his family and two children and to look
2 after their home but with great
3 difficulty."

4 **MR. OUELLETTE:** The great difficulty was
5 financial.

6 **MR. MANSON:** Yes, but you accept that that
7 was Dr. Laferriere's view of your situation in 1994?

8 **MR. OUELLETTE:** Yes, at the time, yes.

9 **MR. MANSON:** Now, I have a few questions to
10 ask you about Ken Seguin.

11 **MR. OUELLETTE:** Yes.

12 **MR. MANSON:** Yesterday you told Mr. Dumais
13 that you were first put on probation as a juvenile?

14 **MR. OUELLETTE:** Yes.

15 **MR. MANSON:** And you weren't sure what the
16 charge was, that it could have been stealing or it could
17 have been drugs; correct?

18 **MR. OUELLETTE:** Yes, either one.

19 **MR. MANSON:** And you recall being in
20 juvenile court?

21 **MR. OUELLETTE:** Yes, Judge Fitzpatrick.

22 **MR. MANSON:** And you recall being placed on
23 probation for a period of months?

24 **MR. OUELLETTE:** I believe it was eight
25 months. It could have been more, it could have been less.

1 **MR. MANSON:** And you thought yesterday that
2 this would be around 1969 which would make you 15, 15 and-
3 a-half.

4 **MR. OUELLETTE:** Yes.

5 **MR. MANSON:** So this would be the first time
6 you were on probation; correct?

7 **MR. OUELLETTE:** Yes.

8 **MR. MANSON:** And your probation officer was
9 Ken Seguin?

10 **MR. OUELLETTE:** Yes.

11 **MR. MANSON:** I know that there were other
12 probation periods a few years later but the abuse that you
13 talked about yesterday, did any of that occur during this
14 first period?

15 **MR. OUELLETTE:** Groping, asking me if I had
16 girlfriends, asking me if I masturbated. When I first gave
17 my deposition, I -- like I said, there are many occasions
18 when he was my probation officer so ---

19 **MR. MANSON:** Well, let's just go through it
20 bit by bit.

21 **MR. OUELLETTE:** I would say that there were
22 occasions when he was touching me not exactly sexually but
23 it was leading to that.

24 **MR. MANSON:** So your evidence is that the
25 escalation of the abuse, the fellatio, began during one of

1 the later periods on probation?

2 MR. OUELLETTE: Yes.

3 MR. MANSON: And from your record I see that
4 you were placed on probation for a year, December 5th, 1973?

5 MR. OUELLETTE: Yes.

6 MR. MANSON: And that was for a B & E and
7 theft; correct?

8 MR. OUELLETTE: Yes.

9 MR. MANSON: And your probation officer was
10 Ken Seguin?

11 MR. OUELLETTE: Yes.

12 MR. MANSON: In 1974 you went to jail for
13 the first time?

14 MR. OUELLETTE: Yes.

15 MR. MANSON: Is that correct?

16 MR. OUELLETTE: It was revoked. That's when
17 it was revoked.

18 MR. MANSON: Yes, that's what I wanted to
19 get to.

20 The charge was robbery and you were
21 sentenced to 15 months definite and 8 months indefinite;
22 correct?

23 MR. OUELLETTE: Right.

24 MR. MANSON: And you would have been
25 released prior to the indefinite period so you were

1 essentially on parole; correct?

2 **MR. OUELLETTE:** I'm not certain if they put
3 me on parole but I do believe I applied for -- it's
4 possible that that was the time that they had put me on
5 parole.

6 **MR. MANSON:** And again, Ken Seguin was your
7 parole officer now?

8 **MR. OUELLETTE:** Yes.

9 **MR. MANSON:** It's true, isn't it, that while
10 this sexual abuse was going on that he would threaten to
11 breach you if you didn't comply?

12 **MR. OUELLETTE:** Well, he's the one who put
13 me in jail for not complying in the first place and when I
14 got out of jail he did it again and he kept on doing it
15 again because he was in a position of authority. He held
16 that like a sword over my head and that had ---

17 **MR. MANSON:** I want to talk about that sword
18 for a minute. Did any of these threats involve the mention
19 of Alfred?

20 **MR. OUELLETTE:** I'm not sure. I know
21 probably Alfred came up at some point but that was when I
22 was younger.

23 **MR. MANSON:** Well, that's my point. If
24 Alfred came up, it would have been while you were a
25 juvenile, wouldn't it?

1 **MR. OUELLETTE:** M'hm. I wasn't an adult
2 offender at the time. I kind of remember him saying
3 something about Alfred but I'm not sure if he was referring
4 to me or not. If I were to say that I would be lying.

5 **MR. MANSON:** From the documents there is an
6 account of a meeting between your father and Ken Seguin?

7 **MR. OUELLETTE:** Yes.

8 **MR. MANSON:** And it was shortly after that
9 that you were sent back to jail, wasn't it?

10 **MR. OUELLETTE:** Yes, it was.

11 **MR. MANSON:** And from what I have seen you
12 didn't go back to court but you were sent back to jail by
13 Ken Seguin?

14 **MR. OUELLETTE:** Two RCMP attended to the
15 probation office and picked me up there and put me in the
16 county bucket. No, I went to the police station first --
17 no, maybe I went to the county bucket. I think I went
18 exact -- directly to the county bucket and from there I was
19 assessed and sent to OCI.

20 **MR. MANSON:** So what I'm getting at is this
21 return to jail would have been a revocation of your parole.
22 Does that ring a bell?

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

25 **MR. MANSON:** Because it didn't involve ---

1 **MR. OUELLETTE:** Probation, parole, it's all
2 the same.

3 **MR. MANSON:** Well, the difference would be
4 if it was a breach of probation you would have to go back
5 to court and you didn't go back to court. It was done at
6 the behest of Ken Seguin because he revoked you ---

7 **MR. OUELLETTE:** And it was Guy Jodoin who
8 signed the papers.

9 **MR. MANSON:** But I am correct that it was
10 done by Ken Seguin?

11 **MR. OUELLETTE:** Yes, it was.

12 **MR. MANSON:** It wasn't done by a judge?

13 **MR. OUELLETTE:** No.

14 **MR. MANSON:** Okay.

15 **MR. OUELLETTE:** But I had to go see the
16 justice of the peace before they put me away.

17 **MR. MANSON:** Because there was a warrant
18 that had to be executed?

19 **MR. OUELLETTE:** It was some kind of thing
20 like that. It was Constable Larry Galas (sp.) and, I
21 believe, Morris or Mo Amess or Lamesse (sp.) that attended
22 that meeting.

23 **MR. MANSON:** I want to move onto something
24 else.

25 At one point when you were on probation, it

1 was suggested that you get a job and that you should go to
2 Manpower; correct?

3 MR. OUELLETTE: Yes, emphasized, yes.

4 MR. MANSON: Now, I understand that Ken
5 Seguin made an appointment for you at Manpower and he
6 arranged for Nelson Barque to take you there?

7 MR. OUELLETTE: Yes, he did.

8 MR. MANSON: Thinking back to that day, and
9 I know it's a long time ago and I know it's difficult, but
10 when you got to Manpower did you wait in line? Did you
11 have to take a number or ---

12 MR. OUELLETTE: I ---

13 MR. MANSON: Let me just finish -- or had an
14 appointment been arranged for you?

15 MR. OUELLETTE: The appointment was arranged
16 for me. He had some -- he was seeing some girl because he
17 was in the middle of another appointment.

18 MR. MANSON: Now, the "he" is Richard
19 Hickerson; correct?

20 MR. OUELLETTE: Yes. And I was next in line
21 to see him. It was like an immediate appointment.

22 MR. MANSON: Was it your understanding that
23 Ken Seguin had arranged for you to meet Richard Hickerson
24 specifically?

25 MR. OUELLETTE: Oh yes, yes, yes. Mentioned

1 him by name.

2 MR. MANSON: Later on in your evidence
3 yesterday you talked about your situation with Chris
4 Wilson?

5 MR. OUELLETTE: Yes.

6 MR. MANSON: And this would be mid- to late
7 seventies; correct?

8 MR. OUELLETTE: I would say later seventies.

9 MR. MANSON: So you're at least -- you're
10 approximately 24 years old perhaps?

11 MR. OUELLETTE: Twenty-three (23) or 24
12 years old.

13 MR. MANSON: And that ended when you met a
14 young woman and decided that this situation or
15 relationship, whatever you want to call it with Chris
16 Wilson, was a mistake and you wanted to end it; correct?

17 MR. OUELLETTE: I thought it was insane and
18 that I was going insane and that I'm definitely not gay.
19 So I said something's wrong with this picture. They're
20 sick and it's not about me. So I don't belong with men, I
21 belong with women.

22 MR. MANSON: But it was many, many years --
23 it wasn't until the -- until Project Truth that you talked
24 about your abuse by Ken Seguin and Richard Hickerson?

25 MR. OUELLETTE: Well, there were a few

1 people that I mentioned it to.

2 MR. MANSON: Friends?

3 MR. OUELLETTE: Yes, friends.

4 MR. MANSON: Would it be fair to say that
5 you didn't feel there was anybody official that you could
6 talk to about that?

7 MR. OUELLETTE: Yes, because a) it was a
8 probation officer that did it; b) anytime that I would
9 approach anybody like a counsellor or a doctor, I would be
10 surprised to find out that they didn't even write it down
11 and/or they didn't want to discuss it and/or they would
12 say, "It's not due to that; it's due to a mood disorder or
13 something else" and they wouldn't even acknowledge it or
14 validate it. They just -- "It's all in your head".

15 MR. MANSON: So your feeling was for a long
16 time that there was no point in doing anything official
17 because people weren't interested?

18 MR. OUELLETTE: Exactly.

19 MR. MANSON: People wouldn't take you
20 seriously?

21 MR. OUELLETTE: Exactly.

22 MR. MANSON: People wouldn't believe you?

23 MR. OUELLETTE: Exactly.

24 MR. MANSON: I have one more question for
25 you and that's about Dick Nadeau?

1 **MR. OUELLETTE:** Yes.

2 **MR. MANSON:** Did you know that in 2000 he
3 was attempting to investigate Ken Seguin and calling
4 himself a private investigator?

5 **MR. OUELLETTE:** No. Well, I knew he was
6 investigating, and I don't blame him for looking into
7 things because some people do want to know, but as for how
8 serious he was, and I knew he was devoted to his website,
9 but I had no idea that he was considering himself a private
10 investigator.

11 **MR. MANSON:** Did you give him any
12 instructions or ask him to investigate your allegations for
13 you?

14 **MR. OUELLETTE:** I asked him to acquire the
15 Somerville Report prepared by Anne Gilmore and Margaret
16 Somerville for the Ethics Committee for Corrections Canada,
17 which recommends things.

18 **MR. MANSON:** So that was the extent of what
19 you asked him?

20 **MR. OUELLETTE:** And my criminal -- not my
21 criminal but my conviction records and/or my institutional
22 records from Corrections, Provincial Corrections, so that I
23 could prove that what they had done occurred.

24 **MR. MANSON:** Can I just go back for a minute
25 to the period of time when you were abused by Richard

1 Hickerson?

2 **MR. OUELLETTE:** Yes.

3 **MR. MANSON:** Were you still on probation at
4 that time or parole? Can you recall?

5 **MR. OUELLETTE:** At some points, yes, I'm
6 sure.

7 **MR. MANSON:** Were you being abused by Ken
8 Seguin and Richard Hickerson during the same period of
9 time?

10 **MR. OUELLETTE:** You mean at the same time,
11 like they were taking turns? No. It was like one dropped
12 me, and the other one took off where the other one dropped
13 me.

14 **MR. MANSON:** During any of the time that you
15 spent ---

16 **THE COMMISSIONER:** I'm sorry, Mr. Manson.
17 Well, I don't know that you specifically
18 answered the question.

19 **MR. OUELLETTE:** They both harassed me, but
20 only one assaulted me at a time.

21 **THE COMMISSIONER:** Right. But was it in the
22 same period of time, not at the same occasion, but ---

23 **MR. OUELLETTE:** Yes.

24 **THE COMMISSIONER:** Okay.

25 **MR. OUELLETTE:** In some cases, yes. Not all

1 the time there. That doesn't apply to all the occasions
2 because they happened off and on.

3 MR. MANSON: So if I drew a line that
4 covered a period of time, weeks or months, during which you
5 were abused by Ken Seguin and I drew another line during
6 which you were abused by Richard ---

7 MR. OUELLETTE: It would be the late
8 seventies.

9 MR. MANSON: But those two lines would
10 overlap to some degree?

11 MR. OUELLETTE: Off and on, yes, like a
12 frequency on a siloscope.

13 MR. MANSON: But they would overlap?

14 MR. OUELLETTE: In some cases, yes.

15 MR. MANSON: At any time that you spent with
16 Richard Hickerson, did the name Ken Seguin pop up in
17 conversations?

18 MR. OUELLETTE: No, ever -- not ever.

19 MR. MANSON: Thanks, Mr. Ouellette.

20 MR. OUELLETTE: You're welcome.

21 MR. MANSON: Those are my questions.

22 THE COMMISSIONER: Thank you.

23 Mr. Lee.

24 MR. LEE: Mr. Ouellette is my client.

25 THE COMMISSIONER: I'm sorry. Sorry.

1 Mr. Chisholm.

2 **MR. CHISHOLM:** Good morning, sir.

3 **THE COMMISSIONER:** Good morning.

4 **MR. CHISHOLM:** Good morning, Mr. Ouellette.

5 My name is Peter Chisholm. I'm counsel for the Children's
6 Aid Society of the United Counties of Stormont, Dundas and
7 Glengarry. I have no questions for you, but I would like
8 to thank you for coming today and yesterday to share your
9 evidence with us. Thank you very much.

10 **MR. OUELLETTE:** I have a question for you.

11 **THE COMMISSIONER:** No.

12 Who is cross-examining? Mr. Neuberger? Mr.
13 Rose, sorry.

14 **MR. ROSE:** Sorry, Mr. Commissioner, as a
15 result of Mr. Manson's cross-examination, I'm trying to
16 find a document that I had not intended to cross-examine
17 on.

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

19 **MR. ROSE:** Good morning, Mr. Ouellette. My
20 name is David Rose. I'm counsel for the Ministry of
21 Community Safety and Correctional Services.

22 Just give me a second. Let me speak with
23 Mr. ---

24 **THE COMMISSIONER:** Certainly.

25 **MR. MANSON:** While Mr. Rose is doing that,

1 Mr. Commissioner, I apologize, but I noticed from my notes
2 that I had one question that I hadn't asked. With your
3 permission, Mr. Commissioner ---

4 **THE COMMISSIONER:** Sure. That's fine.

5 **MR. MANSON:** Did any of the abuse at the
6 hands of Ken Seguin take place in the probation office?

7 **MR. OUELLETTE:** Groping.

8 **MR. MANSON:** But the ---

9 **MR. OUELLETTE:** Harassment. He unzipped his
10 zipper. He was going to pull it out, but he didn't. He
11 hesitated.

12 I have to say I also protested loudly enough
13 for people to be able to hear me, and it just seems funny
14 that nobody came to my aid.

15 **MR. MANSON:** So the abuse that you described
16 in the various statements, this took place at his house, in
17 a car and sometimes at a motel?

18 **MR. OUELLETTE:** At a cottage, at a motel,
19 mostly in a car and one time in a movie theatre.

20 **MR. MANSON:** And one more question.

21 When you would meet him at the office, would
22 this be during regular working hours or after hours?

23 **MR. OUELLETTE:** Later in the day, about 5:00
24 to about six o'clock at night were when most of my
25 appointments were scheduled for.

1 **MR. MANSON:** Thank you, Mr. Ouellette.

2 **MR. OUELLETTE:** You're welcome.

3 **MR. MANSON:** I apologize, Mr. Commissioner.

4 **THE COMMISSIONER:** No, that's fine.

5 Mr. Rose.

6 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR MR.**

7 **ROSE:**

8 **MR. ROSE:** Mr. Manson asked you some
9 questions this morning, Mr. Ouellette, about Mr. Seguin and
10 you re-entering jail as a result of things that Mr. Seguin
11 did, and he asked you some questions about your criminal
12 record. Do you remember that?

13 **MR. OUELLETTE:** Yes.

14 **MR. ROSE:** Okay. And the criminal record
15 which we have for you indicates that you were convicted in
16 1973 of a break-and-enter for which you got a suspended
17 sentence and probation, which you would not have been in
18 jail for?

19 **MR. OUELLETTE:** Probably not.

20 **MR. ROSE:** And then in 1974, in August, on
21 August 14th, 1974, in other words, about eight months later,
22 you were given a jail term for robbery. That's the 15
23 months definite and 8 months indefinite that Mr. Manson
24 asked you about?

25 **MR. OUELLETTE:** Sounds right.

1 **MR. ROSE:** Okay. And then in terms of the
2 next conviction, it has a trafficking in a narcotic
3 conviction, which gave you six months concurrent. In other
4 words, it would not have given you any additional jail?

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

6 **MR. ROSE:** Does that sound familiar?

7 **MR. OUELLETTE:** Yes.

8 **MR. ROSE:** Okay. And then the next
9 conviction you have is 1982, when there are some drug
10 charges for which you got 18 months on each of two counts.
11 Does that look ---

12 **MR. OUELLETTE:** Trafficking of LSD?

13 **MR. ROSE:** It doesn't say, but it could very
14 well be trafficking of LSD, and a conspiracy charge.

15 **MR. OUELLETTE:** That's it.

16 **MR. ROSE:** Right. And for that offence, you
17 were paroled about nine months later. In other words, in
18 November of 1982.

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

20 **MR. ROSE:** Do you remember making the
21 parole, appearing before a parole board ---

22 **MR. OUELLETTE:** Yes, I do. It was Mr. White
23 that gave me my parole.

24 **MR. ROSE:** And was it that parole ---

25 **MR. OUELLETTE:** Whitehead.

1 **MR. ROSE:** --- was it that parole, sir, that
2 you say Mr. Seguin revoked or caused to have you go back
3 into jail?

4 **MR. OUELLETTE:** No. It's the one that
5 happened in '73-'74.

6 **MR. ROSE:** Okay. Because your criminal
7 record doesn't show you ever having a parole before
8 November.

9 **MR. OUELLETTE:** Well, for whatever reason, I
10 ended up in OCI Guelph and Millbrook in approximately 1974,
11 and that's when the original, you know, wrongful
12 imprisonment because I refused to blow him.

13 **MR. ROSE:** Okay, but all I'm suggesting is -
14 - Mr. Manson asked you some questions about breaching
15 probation, and you agreed with him that when you went back
16 to jail as a result of Ken Seguin, you never appeared
17 before a judge for instance, and he convicted you of breach
18 of probation. That never happened?

19 **MR. OUELLETTE:** Breach of probation, I
20 appeared before Keith Jodoin, Justice of the Peace.

21 **MR. ROSE:** A justice of the peace convicted
22 you of breach of probation?

23 **MR. OUELLETTE:** He signed the commitment
24 papers.

25 **MR. ROSE:** Okay. Is it possible, sir, that

1 the reason why you were in jail in 1974 was simply because
2 of the robbery conviction in August of 1974?

3 **MR. OUELLETTE:** It's possible. I don't know
4 how I ended up in jail, but I do know it wasn't due to just
5 being convicted. It was also due to not cooperating with
6 Ken Seguin.

7 **MR. ROSE:** Okay. Now, about the probation
8 order that you've talked about, and you've talked about
9 probation and Mr. Hickerson ---

10 **MR. OUELLETTE:** Yes.

11 **MR. ROSE:** --- in the course of your
12 testimony in the last couple of days.

13 You understand that when you are put on
14 probation, as you were in 1973, as we've talked about, it
15 would be the judge that sets the terms of probation. I
16 take it you agree with me about that?

17 **MR. OUELLETTE:** Right.

18 **MR. ROSE:** Okay. And do you recall in your
19 terms of probation, Mr. Ouellette, did the judge ever ask
20 or impose that there be for instance a term that you seek
21 and maintain employment? Did that ever happen?

22 **MR. OUELLETTE:** I don't recall.

23 **MR. ROSE:** Is it possible, sir?

24 **MR. OUELLETTE:** It's possible.

25 **MR. ROSE:** Okay. Because in 1973, you would

1 have been what, around 19? And -- sorry, the court
2 reporter doesn't pick up just when -- you have to say
3 something, as we say, verbalize.

4 **MR. OUELLETTE:** Oh, yes, yes, okay. Sorry.

5 **MR. ROSE:** It's okay.

6 So in terms of when you are 19 years old in
7 1973, I think you've given the sense that you had
8 employment problems. You weren't always having a full-time
9 job, right? In that timeframe, back in 1973?

10 **MR. OUELLETTE:** No, in that timeframe, I had
11 a lot of difficulty to get a full-time job because I only
12 had a Grade 10 education basically and I hadn't -- I don't
13 think by then I -- it was 1973, you were talking about?

14 **MR. ROSE:** Yes, in the early seventies ---

15 **MR. OUELLETTE:** I didn't take my retraining
16 yet. That happened in about '77, '76. And then when I got
17 my Grade 12, then I continued on from there.

18 **MR. ROSE:** So it's entirely possible that
19 the judge who set the terms of your probation imposed a
20 term that you seek and maintain employment?

21 **MR. OUELLETTE:** This is what Ken Seguin was
22 referring to when he said, "Go see Hickerson".

23 **MR. ROSE:** Okay. And you say that he
24 specifically said, "Go see Richard Hickerson". He
25 mentioned that name?

1 **MR. OUELLETTE:** He said, "Go see Richard
2 Hickerson from the Manpower. I just made you an
3 appointment with him".

4 **MR. ROSE:** Okay. Is it possible that, in
5 fact ---

6 **MR. OUELLETTE:** He was speaking on the phone
7 with him personally.

8 **MR. ROSE:** Okay. Is it possible that in
9 fact he simply said, "Go to see Manpower"?

10 **MR. OUELLETTE:** No.

11 **MR. ROSE:** Okay. I am going to ask you to
12 look at a statement that was entered as an exhibit
13 yesterday. It's Exhibit 585.

14 And I am going to ask Madam Registrar to put
15 up Bates page number 7050250. Now, Exhibit 585 that is
16 going to appear on your screen shortly is the statement
17 that you gave to Detective Constable Seguin and Detective
18 Constable Dupuis on October 30th, 1997, and you've talked
19 about that over the last couple of days.

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

21 **THE COMMISSIONER:** Can we stop you there.
22 Madam Clerk, could you get the paper?

23 **MR. ROSE:** And just for everyone's
24 assistance, Bates page 7050250, which is page 8 of 34 on
25 the hard copy.

1 **THE COMMISSIONER:** Okay. Can we get the
2 hard copy for the witness please?

3 **THE REGISTRAR:** What page on the document?

4 **THE COMMISSIONER:** Page 8 of 34.

5 **MR. ROSE:** Mr. Commissioner, it turns out
6 that the document that I'm using has a different Bates page
7 on the page, but I think if we refer to simply the physical
8 page, where it says, "Page 8 of 34" at the bottom right, I
9 think you are going to be okay.

10 **THE COMMISSIONER:** Sure, okay.

11 **MR. ROSE:** So it starts with the line about
12 two-thirds of the way down the line where it says "Seguin:
13 Okay".

14 **MR. OUELLETTE:**

15 "Seguin: Okay. Now we all know that
16 Ken Seguin is deceased now..."

17 **MR. ROSE:** Right. So it says, read, it
18 says, "Seguin...". This is Detective Constable Seguin
19 speaking. He says:

20 "Okay. We all know that Ken Seguin is
21 deceased now. You mentioned that he
22 introduced you to a fellow by the name
23 of Hickerson."

24 You say, "Yes."

25 Mr. Seguin says:

1 "Can you tell us about that?"

2 Answer:

3 "Well, he didn't introduce me to him.
4 He sent me to him. Well, he actually
5 sent me to Manpower. I'm not really --
6 I can't say he sent me to Dick by name
7 [there's background noise] but I'm
8 pretty sure said my name, but I can't
9 go on statement saying I'm positive..."

10 And then turning over to the next page.

11 Do you want to take a look at the next page,

12 Mr. Ouellette?

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

14 **MR. ROSE:** He says:

15 "Okay, okay. But he did send me to
16 Richard Hickerson and he did make an
17 appointment for me. So I assume it was
18 with Dick Hickerson because he's the
19 one who took me on right away."

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

21 **MR. ROSE:** Do you remember saying that to
22 the officers ---

23 **MR. OUELLETTE:** Well, yes, and where I'm
24 saying, "I can't go on statement that I'm positive" ---

25 **MR. ROSE:** Right.

1 **MR. OUELLETTE:** --- is because when you're
2 preoccupied, sir, with if the guy across the desk from you
3 is going to jump you for any moment -- or any given moment,
4 you're not really paying attention to what he's talking
5 about. You're thinking about is he going to jump me.

6 So it really doesn't come to mind.

7 **MR. ROSE:** Okay. I just want to ask you
8 again. Are you positive that he sent you to Manpower or
9 are you positive that he sent you to Richard Hickerson?

10 **MR. OUELLETTE:** He introduced me not -- what
11 I meant by that is that he didn't introduce me person-to-
12 person. That's what I mean by he didn't introduce me. He
13 sent me to Manpower and sent me -- and told me he was
14 sending me to Richard Hickerson. That's what that means.
15 You can interpret it anyway you want, but that's the way it
16 is.

17 **MR. ROSE:** Okay. So if you said to
18 Constables Seguin and Dupuis that you are not positive, you
19 can't go on statement saying that you are positive that he
20 mentioned Hickerson by name, I take it your evidence before
21 the Commissioner is that he did mention you by name.
22 You're positive?

23 **MR. OUELLETTE:** I'm saying that ---

24 **MR. ROSE:** I just want to make sure we are
25 clear.

1 **MR. OUELLETTE:** --- what I am not positive
2 about is being introduced personally, face-to-face with the
3 man. That's what I'm saying.

4 **MR. ROSE:** Okay.

5 **MR. OUELLETTE:** But as far as hearing his
6 name being spoken to by Ken Seguin on the phone, that I am
7 positive about.

8 **MR. ROSE:** Okay. I want to move on to a
9 different ---

10 **MR. OUELLETTE:** And if I didn't say it then,
11 I said, whatever I said here doesn't really matter because
12 at the time, I was ill. I was stressed. I was on
13 medication. I was affected by what they had done to me in
14 jail. You do have problems recalling things when you're
15 stressed out, sir, with all due respect.

16 **MR. ROSE:** I want to move on to something
17 different, Mr. Ouellette.

18 This October 30th statement from 1997, you
19 were asked some questions about it yesterday by Mr. Dumais
20 here, and I recall your evidence yesterday saying that you
21 were not sure how it was that Detective Constable Seguin
22 and Detective Constable Dupuis knew about you.

23 Do you remember that?

24 **MR. OUELLETTE:** Yes. I wasn't ---

25 **MR. ROSE:** And I just want to ---

1 **MR. OUELLETTE:** --- positive. I was informed
2 later how that happened.

3 **MR. ROSE:** Okay. Well, let's go through
4 some of that.

5 October 30th, 1997, you had just been
6 released from jail a couple of days before. Do you
7 remember that?

8 **MR. OUELLETTE:** You mean after the initial
9 OPP interview?

10 **MR. ROSE:** Well ---

11 **MR. OUELLETTE:** When van Diepen got me out
12 of there?

13 **MR. ROSE:** It was taken from the October 30th
14 of 1997, the statement that I just asked you about.

15 **MR. OUELLETTE:** Okay.

16 **MR. ROSE:** Okay.

17 **MR. OUELLETTE:** That was audiotaped at my
18 home?

19 **MR. ROSE:** Right. In other words, you were
20 out of jail, obviously?

21 **MR. OUELLETTE:** Right.

22 **MR. ROSE:** And you had just been released
23 from jail a couple of days before. I think it was October
24 28th. Does that sound familiar?

25 **MR. OUELLETTE:** It could be.

1 **MR. ROSE:** Okay. And yesterday you had said
2 that Mr. van Diepen had told you that you should not report
3 the abuse to the police?

4 **MR. OUELLETTE:** No, he didn't say that.
5 What I mean is -- if I said that, I want to correct it.
6 What I said is and what I mean to say is he told me that if
7 I wanted to get out of the jail that I was in, that he
8 would highly recommend that I sign this piece of paper that
9 he just jotted down this stuff on. I had a very difficult
10 time reading it because I didn't have these at the time,
11 and I -- after contesting with him and debating with him
12 for about 20 minutes about how I found that to be unjust
13 and unfair, I ended up signing it.

14 **MR. ROSE:** Okay.

15 **MR. OUELLETTE:** Because he said I wouldn't
16 be getting out of there if I didn't.

17 **MR. ROSE:** Did you take that from Mr. van
18 Diepen as, in your evidence, a discouragement? In other
19 words, he was discouraging you ---

20 **MR. OUELLETTE:** I took it as a complete and
21 utter threat.

22 **MR. ROSE:** A threat?

23 **MR. OUELLETTE:** Yes, because I was being
24 housed with sex abuse offenders at the time.

25 **MR. ROSE:** Okay. And have you since taken

1 an opportunity to look at Constable Dupuis' notes from
2 October 10th?

3 MR. OUELLETTE: Very briefly.

4 MR. ROSE: Okay.

5 MR. OUELLETTE: I didn't want it to damage
6 or pollute or influence my testimony here ---

7 MR. ROSE: Okay.

8 MR. OUELLETTE: --- in any way, shape or
9 form. You asked me to say things to the best of my
10 recollection.

11 MR. ROSE: Let's review some of them.

12 So, for instance, if we can put up Exhibit
13 586, just to make sure that we're clear about what
14 happened, in what sequence.

15 MR. OUELLETTE: M'hm.

16 MR. ROSE: Exhibit 586 is an Offender
17 Incident Report arising from your meeting with Jos van
18 Diepen on October 9th that you just talked about; right?

19 MR. OUELLETTE: Right.

20 MR. ROSE: So I take it you're now aware
21 that Mr. van Diepen reported to his superiors officially
22 what you had told him in the jail?

23 MR. OUELLETTE: Which surprises me.

24 MR. ROSE: Okay. And again, you met with
25 Mr. van Diepen in the jail on October 9th for purposes of

1 preparing what's called a pre-sentence report?

2 MR. OUELLETTE: Yes.

3 MR. ROSE: Right.

4 That was the reason why you were meeting
5 with Mr. van Diepen?

6 MR. OUELLETTE: Well, I wasn't aware that
7 that's what it was, but now I am.

8 MR. ROSE: Okay. And when you were
9 sentenced to time served on October 28th of 1997, I take it
10 that the pre-sentence report was presented in court, wasn't
11 it?

12 MR. OUELLETTE: I imagine so.

13 MR. ROSE: And you got time served?

14 MR. OUELLETTE: I imagine so.

15 MR. ROSE: Well, you're out of jail by
16 October 30th, two days later. It makes sense, right?

17 MR. OUELLETTE: I applied for early release.
18 I was painting the kitchen.

19 MR. ROSE: Okay. And if we could just turn
20 to a document -- this is not an exhibit. It's been given
21 notice. It's Document 733614, which is a long document.
22 I'll give you a Bates page. It's 7131163. These are
23 Constable Dupuis' notes from October 10th, 1997, which is
24 the very next day that you had seen Mr. van Diepen in jail
25 for purposes of the pre-sentence report.

1 **THE COMMISSIONER:** Exhibit Number 593 is
2 excerpts of Officer Seguin's notes, you said?

3 **MR. ROSE:** Yes -- no, Dupuis.

4 **THE COMMISSIONER:** Dupuis, sorry.

5 **--- EXHIBIT NO/PIÈCE NO. P-593:**

6 (7131163) Excerpts of Constable Dupuis'
7 notes re: phone call from Jos van Diepen,
8 dated October 10th, 1997

9 **MR. ROSE:** And it should have on the top
10 left the printed number 34.

11 **THE COMMISSIONER:** Top left? Oh, on the
12 second page it would have it?

13 **MR. ROSE:** Yes. Do you see that there, Mr.
14 Ouellette?

15 **THE COMMISSIONER:** Yes, he's there, okay.

16 **MR. ROSE:** Okay. And I think that's going
17 to appear on screen shortly. If we could just read where
18 it says -- do you see, Mr. Ouellette, where it says 10:10?

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

20 **MR. ROSE:** Okay. Now, I don't know whether
21 you've seen this before, but these are ---

22 **MR. OUELLETTE:** Never.

23 **MR. ROSE:** These are the notes of Constable
24 Dupuis from the day after, in fact, the morning after you
25 had seen Mr. van Diepen in jail. And as it says there:

1 "Received call from Jos van Diepen pro
2 patient services that subject by the
3 name of Keith Ken Ouellette..."

4 And there is -- it looks like an FPS number, which I take
5 to mean your identification number used while you were in
6 jail.

7 "...DOB 13 November '54..."

8 And there's an address. I take it that address is yours?

9 **MR. OUELLETTE:** It was.

10 **MR. ROSE:** Okay. That's your correct date
11 of birth?

12 **MR. OUELLETTE:** Yes.

13 **MR. ROSE:** Okay. It says:

14 "Cornwall has complained that he has
15 been sexually assaulted by his ex-
16 probation officer Ken Seguin..."

17 Are you with me so far?

18 **MR. OUELLETTE:** Yes.

19 **MR. ROSE:** "...as well as being assaulted
20 By Richard ..."

21 And it looks like Hickerson.

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

23 **MR. ROSE:** "...and Chris Wilson..."

24 **MR. OUELLETTE:** Yes.

25 **MR. ROSE:** "...van Diepen reports incident

1 to his supervisor because of Seguin.
2 Ouellette is now in custody on
3 threatening charges, threatening person
4 by the name of..."

5 And I can't read that.

6 **THE COMMISSIONER:** It's not important.

7 **MR. ROSE:** Something. And there's an
8 address and a phone number. Have I read that correctly?

9 **MR. OUELLETTE:** Yes, you have.

10 **MR. ROSE:** Now, I take it that Constable
11 Dupuis and Mr. van Diepen, if and when they testify, would
12 say that the very next day, Mr. van Diepen actually called
13 the police and made the complaint to them, effectively on
14 your behalf.

15 **MR. OUELLETTE:** Like I said, it surprises
16 me.

17 **MR. ROSE:** But does that help you explain
18 why it is that the Ontario Provincial Police came to see
19 you?

20 **MR. OUELLETTE:** Oh, yes.

21 **MR. ROSE:** In other words, it was because of
22 Mr. van Diepen, wasn't it?

23 **MR. OUELLETTE:** Yes.

24 **MR. ROSE:** You didn't make the complaint; he
25 did?

1 **MR. OUELLETTE:** Right, because at the time
2 Perry Dunlop was phoning me to get information that I
3 wouldn't give him.

4 **MR. ROSE:** Right.

5 It was Mr. van Diepen who gave the
6 information to the OPP, wasn't it?

7 **MR. OUELLETTE:** Right.

8 **MR. ROSE:** Thank you, Mr. Commissioner.
9 Those are my questions.

10 **MR. OUELLETTE:** And I appreciate it, by the
11 way.

12 **THE COMMISSIONER:** Mr. Kloeze.

13 --- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR MR.
14 **KLOEZE:**

15 **MR. KLOEZE:** Good morning, Mr. Ouellette.

16 **MR. OUELLETTE:** Good morning.

17 **MR. KLOEZE:** My name is Darrell Kloeze. I'm
18 counsel for the Ministry of the Attorney General and it's
19 our ministry that employs the Crown attorneys that
20 prosecute cases in Ontario.

21 I only have one question for you.

22 Exhibit 588 which was shown to you yesterday
23 -- Madam Clerk, can we put that on the screen?

24 **THE COMMISSIONER:** You'll see it. It's in
25 the three -- it's in a three-ring binder.

1 **MR. KLOEZE:** This is a one- or two-page
2 document that was shown to you yesterday, a memo from Alain
3 Godin who was, at the time, the Assistant Crown Attorney in
4 North Bay who wrote an opinion as to whether or not to lay
5 charges against Chris Wilson.

6 **MR. OUELLETTE:** Oh, yes.

7 **MR. KLOEZE:** Do you remember seeing that
8 yesterday?

9 **MR. OUELLETTE:** Yes.

10 **MR. KLOEZE:** I'll wait for you to see the
11 document.

12 **MR. OUELLETTE:** Do you have a tab number?

13 **THE COMMISSIONER:** Yes, 588.

14 **MR. OUELLETTE:** Five eighty-eight (588)?
15 Okay. Got it.

16 **MR. KLOEZE:** Now, I assume -- and tell me if
17 this is correct -- you saw this document only for the first
18 time when you were preparing to give testimony at this
19 Inquiry?

20 **MR. OUELLETTE:** Yes.

21 **MR. KLOEZE:** Was yesterday the first time
22 that you saw the document or had you seen it before?

23 **MR. OUELLETTE:** I don't believe I've ever
24 seen this document before, no, not until yesterday.

25 **MR. KLOEZE:** Okay. And I also assume that

1 you never met with Mr. Godin?

2 **MR. OUELLETTE:** No.

3 **MR. KLOEZE:** Okay. Those are my questions.
4 Thank you very much.

5 **THE COMMISSIONER:** All right. Thank you.
6 Mr. Callaghan.

7 **MR. CALLAGHAN:** If I could be given a moment
8 to get things organized?

9 **(SHORT PAUSE/COURTE PAUSE)**

10 **--- CROSS-EXAMINATION BY/CONTRE INTERROGAOTIRE PAR MR.**
11 **CALLAGHAN:**

12 **MR. CALLAGHAN:** Pardon me, Mr. Ouellette.

13 My name is John Callaghan, sir. I act for
14 the Cornwall Police and I just have a few questions for
15 you.

16 I just want to sort of situate things if I
17 might. As is indicated, you first met with the OPP October
18 31st, '97; correct?

19 **MR. OUELLETTE:** As for the exact date ---

20 **MR. CALLAGHAN:** That's all right.

21 **MR. OUELLETTE:** But I have met with the OPP.

22 **MR. CALLAGHAN:** Right, and you dealt with
23 them for a considerable period of time thereafter?

24 **MR. OUELLETTE:** Yes.

25 **MR. CALLAGHAN:** Right. And up until that

1 time I gather -- you know, we saw the criminal record.
2 There are some possessions of narcotics and some
3 trafficking and a few small property offences; correct?

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

5 **MR. CALLAGHAN:** That's a "yes"?

6 **MR. OUELLETTE:** Yes.

7 **MR. CALLAGHAN:** Thank you.

8 **MR. OUELLETTE:** Sorry.

9 **MR. CALLAGHAN:** That's all right. I do it
10 myself.

11 Beyond that, though, you had a lot of
12 interaction with the Cornwall Police from, say, 1994 right
13 through to when you started dealing with the OPP in terms
14 of dealing with issues relating to your children, for
15 example?

16 **MR. OUELLETTE:** Yes.

17 **MR. CALLAGHAN:** All right.

18 And is that the conduct which you say was
19 harassing during that period? Was that ---

20 **MR. OUELLETTE:** As I stated, there was a
21 lack of understanding and belief in a climate that was very
22 hostile, directed toward me for just not understanding what
23 the situation was.

24 **MR. CALLAGHAN:** The situation, your
25 condition?

1 **MR. OUELLETTE:** The condition was created by
2 my environment ignoring me.

3 **MR. CALLAGHAN:** Right, but ---

4 **MR. OUELLETTE:** For a legitimate reason and
5 as a consequence of that I was punished for it which
6 frustrated me further. It would be a normal reaction I'm
7 sure, for any parent.

8 **MR. CALLAGHAN:** And your condition is as
9 stated, I guess, in Dr. Laferriere's letter, bipolar
10 affective disorder for ---

11 **MR. OUELLETTE:** That's his opinion.

12 **MR. CALLAGHAN:** Is that not your opinion?

13 **MR. OUELLETTE:** It's a misdiagnosis of post-
14 traumatic stress disorder which resembles all of those
15 things.

16 **MR. CALLAGHAN:** Has that been confirmed by
17 another doctor or is that ---

18 **MR. OUELLETTE:** Yes, it has.

19 **MR. CALLAGHAN:** Which doctor?

20 **MR. OUELLETTE:** Dr. Kaley and many more
21 worldwide.

22 **MR. CALLAGHAN:** All right.

23 But I had thought that one of your
24 complaints that you had given to Mr. Nadeau was that in
25 fact you had been subject to mind-altering experiments

1 while in a provincial institution?

2 MR. OUELLETTE: Absolutely.

3 MR. CALLAGHAN: And why don't we just take a
4 look at your survivor's statement, which is I think the
5 survivor's statement you had indicated that you gave to Mr.
6 Nadeau; correct?

7 MR. OUELLETTE: M'hm.

8 MR. CALLAGHAN: Okay. Let me see if I can
9 put my finger on it.

10 MR. OUELLETTE: The impact statement?

11 MR. CALLAGHAN: The impact statement, yes.

12 MR. OUELLETTE: That was printed on the
13 internet?

14 MR. CALLAGHAN: Yes.

15 MR. OUELLETTE: It was to make people aware
16 of what's really happening and it's a proven documented
17 fact. It's been on W-5. An 88-90 year-old woman just got
18 compensated for the same thing by Dr. Ewan Cameron's 1956
19 experiments. My experiments were conducted on my person
20 from the '70s to the '80s.

21 MR. CALLAGHAN: Well, let me just take you
22 to document 713111, so 713 triple "1".

23 (SHORT PAUSE/COURTE PAUSE)

24 THE COMMISSIONER: Thank you.

25 Exhibit No. 594 is the Survivor Impact

1 Statement from Kenneth Ouellette.

2 --- EXHIBIT NO./PIÈCE NO. P-594:

3 (713111) Keith Ouellette's Survivor Impact
4 Statement

5 MR. CALLAGHAN: And, sir, if I can turn you
6 to the last page of the document; that's your signature?

7 MR. OUELLETTE: It certainly is.

8 MR. CALLAGHAN: Okay.

9 MR. OUELLETTE: I remember it word-for-
10 word.

11 MR. CALLAGHAN: Okay, word-for-word.

12 Now, this is a document -- did you make it
13 for Mr. Nadeau or did you make it for somebody else?

14 MR. OUELLETTE: I made it for the Criminal
15 Compensation Injuries Board.

16 MR. CALLAGHAN: Okay. And I take it you ---

17 MR. OUELLETTE: And for anybody else in
18 between.

19 MR. CALLAGHAN: I understand.

20 And so this is the one that shows up, as you
21 say, on Mr. Nadeau's website?

22 MR. OUELLETTE: Yes, and in other
23 publications.

24 MR. CALLAGHAN: Okay. I just want to
25 understand sort of how we find you in '97-'98. It says:

1 "As a direct result of numerous sexual
2 assaults by my brother (adoptive) and
3 two government employees among others;
4 mind manipulation conducted on myself
5 by the federal and provincial
6 governments, then called the
7 intelligence branch of the RCMP via
8 CIA-backed programs; wrongful
9 incarceration and the aftermath of
10 torture under the influence of LSD-25
11 and possibly other drugs; sensory,
12 light and sleep deprivation, I can only
13 state that I regret being born in a
14 country where people's rights and
15 security are not only ignored but
16 buried in maelstrom of deceit, red tape
17 and systemic discrediting and further
18 abuse of the victim and his family by
19 the very body of institutions which are
20 supposedly in place to protect us."

21 Do you see that?

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

23 **MR. CALLAGHAN:** Okay. I have got to
24 compliment you on your writing. You have a very high IQ,
25 don't you?

1 **MR. OUELLETTE:** Part of the experiments was
2 perception enhancement.

3 **MR. CALLAGHAN:** All right. But you do have
4 a very high IQ. Is that your view?

5 **MR. OUELLETTE:** I was told this.

6 **MR. CALLAGHAN:** All right.

7 And so can you just help me through because
8 I want to see what happens so we can understand going
9 forward:

10 "The mind manipulation conducted on
11 myself by the federal and provincial
12 governments then called the
13 intelligence branch of the RCMP ..."

14 So was it the RCMP that conducted these
15 tests?

16 **MR. OUELLETTE:** The RCMP assisted the
17 psychiatrist at the correctional facility to interrogate me
18 to get into my brain for whatever reason they chose.
19 It could be -- I don't know what their reasoning behind it
20 was for, but it could be for behaviour modification
21 purposes.

22 **MR. CALLAGHAN:** Because you were disruptive
23 to society?

24 **MR. OUELLETTE:** In the '60s and '70s
25 everybody was disruptive to society.

1 **MR. CALLAGHAN:** So is this happening -- we
2 have your record and I think Mr. Manson pointed out the
3 first time you were incarcerated, which I thought was in
4 the late '70s, early '80s -- is that when this happened or
5 is this ---

6 **MR. OUELLETTE:** This happened in the mid --
7 early, mid-'70s, this first occasion. This was done to me
8 twice.

9 **MR. CALLAGHAN:** Done to you twice, and both
10 times by the federal and provincial governments and the
11 intelligence branch?

12 **MR. OUELLETTE:** No, the first time. This
13 second time just the Corrections.

14 **MR. CALLAGHAN:** Okay. And these are CIA-
15 backed programs? That was the first time?

16 **MR. OUELLETTE:** They were sub-projects of
17 the original MK Ultra.

18 **MR. CALLAGHAN:** I'm sorry. You are going to
19 have to -- I've read some of the material. I'm just not as
20 -- what's MK-Ultra?

21 **MR. OUELLETTE:** MK-Ultra was a response to
22 the Korean wars, Korean manchurian candidate thing, where
23 they thought they could train people to assassinate
24 dignitaries so that they could take political coups against
25 countries and obviously history has proven that correct so

1 I don't need to explain this.

2 MR. CALLAGHAN: No, you don't have to
3 explain it but that -- I just wanted to understand the
4 reference. Okay.

5 And just so I can say, the federal
6 government is there -- were you in a federal institution or
7 just a provincial?

8 MR. OUELLETTE: No, but it was a federal
9 program because it was national.

10 MR. CALLAGHAN: And has anyone given you any
11 reason why you were targeted?

12 MR. OUELLETTE: No.

13 MR. CALLAGHAN: No. So you ---

14 MR. OUELLETTE: I have no idea why this was
15 done to me ---

16 MR. CALLAGHAN: And this is ---

17 MR. OUELLETTE: --- other than possibly
18 trying to shut me up.

19 MR. CALLAGHAN: About ---

20 MR. OUELLETTE: --- or make me look confused
21 because when I got out of there, I most certainly was
22 confused.

23 MR. CALLAGHAN: I don't doubt that this
24 happened.

25 So they were trying to shut you up about the

1 events here in Cornwall. Is that it or were you in other -
2 --

3 **MR. OUELLETTE:** I'm not -- I cannot say with
4 absolute positivity that that is the case.

5 **MR. CALLAGHAN:** But is that one of your
6 thoughts or one of your theories?

7 **MR. OUELLETTE:** I believe that it could have
8 something to do with trying to keep me silent.

9 **MR. CALLAGHAN:** Okay. And it says:

10 "...in the aftermath of torture under
11 the influence of LSD 25..."

12 What is LSD 25?

13 **MR. OUELLETTE:** D-Lysergic Acid Diethylamide
14 Tartrate. It's refined from ergot, morning glory seeds,
15 Hawaiian baby woodrow seeds. It can be manufactured in
16 your house if you want it to be, and it is now being re-
17 researched and re-investigated as a possible deterrent to
18 cocaine, crack, heroin and alcoholism and depression ---

19 **MR. CALLAGHAN:** So -- sorry ---

20 **MR. OUELLETTE:** --- and it's being re-
21 investigated offshore, as we speak.

22 **MR. CALLAGHAN:** I'm sorry, but I think the
23 court reporter was going to -- that's a lot of words. What
24 is LSD 25 again? Can you give me that again?

25 **MR. OUELLETTE:** D-Lysergic Acid Diethylamide

1 Tartrate.

2 **MR. CALLAGHAN:** Wow! And did you -- one of
3 your offences, I guess, you said there was trafficking in
4 LSD. Was this LSD 25 ---

5 **MR. OUELLETTE:** Conspiring to traffick.

6 **MR. CALLAGHAN:** I see.

7 **MR. OUELLETTE:** I never actually did it.

8 **MR. CALLAGHAN:** No. Okay.

9 And so how do they do that? Do they inject
10 that or is that something -- is that like the old saying
11 "dropping acid" where you put it on your tongue and all
12 that kind of thing?

13 **MR. OUELLETTE:** Well, it's derived from the
14 plant.

15 **MR. CALLAGHAN:** It's derived from a plant?

16 **MR. OUELLETTE:** And it's a crystallized
17 salt, and it can be dissolved; and it is colourless; and
18 it's odourless; and it can be administered in any way,
19 shape or form.

20 **THE COMMISSIONER:** He is asking you how was
21 it administered to you at that time?

22 **MR. OUELLETTE:** Through my food after it was
23 slipped under my door because I was put in sensory
24 deprivation with no light, no sound. It was a cell within
25 a cell and I was escorted there by about four guards, and I

1 was left in there. And they'd have a sliding door at the
2 very bottom of the -- it was a solid door. And there was
3 no light. There was no heat. I had four wool blankets. I
4 had no cot. I had no mattress, and I was left there barely
5 naked -- almost naked.

6 I would be fed -- I would be subjected to
7 time dilation and time compression, which is they feed you
8 six times a day and/or nothing for a week. So you never
9 know or you are never sure of what time of the day it is or
10 what time supper is coming or you never get the opportunity
11 to wash.

12 You never get the opportunity to speak to
13 anybody. You have complete sensory deprivation, which
14 leads you to only hear your heartbeat and the rushing of
15 your blood in your arteries and jugulars.

16 **MR. CALLAGHAN:** And where was the facility
17 again?

18 **MR. OUELLETTE:** Millbrook.

19 **MR. CALLAGHAN:** Millbrook. And that is here
20 in Ontario?

21 **MR. OUELLETTE:** In Peterborough. Eleven
22 miles from Peterborough, Ontario.

23 **MR. CALLAGHAN:** And just going on. What's
24 time dilation and time compression? What's that?

25 **MR. OUELLETTE:** It's when they take the

1 ability of you to be able to tell time because you need
2 daytime and night time to be able to discern what time of
3 day it is.

4 **MR. DUMAIS:** I don't see -- perhaps,
5 Commissioner, we can simply move on now? The point has
6 been made by Mr. Callaghan. I let him ask his questions,
7 but I mean if he is going to take us line by line through
8 his Victim Impact Statement and his experience, I think his
9 point has been made.

10 **MR. OUELLETTE:** Can I make a statement,
11 please?

12 **THE COMMISSIONER:** No, just a minute.

13 **MR. CALLAGHAN:** Well, maybe he should --
14 maybe the witness should leave if we are going to have a
15 discussion.

16 **THE COMMISSIONER:** Yes.

17 **MR. CALLAGHAN:** I mean, it's not fair to Mr.

18 ---

19 **MR. OUELLETTE:** I think I should make this
20 statement.

21 **THE COMMISSIONER:** Go ahead.

22 **MR. OUELLETTE:** Sir, you want to know the
23 answer to that question?

24 **MR. CALLAGHAN:** Right.

25 **MR. OUELLETTE:** Go home. Lock yourself up

1 in your closet for a month. Have a little bucket that you
2 can pee in. Don't give yourself any food. Don't talk to
3 anybody. Don't allow anybody to talk to yourself. Don't
4 shave. Don't wash.

5 **MR. CALLAGHAN:** Okay.

6 **MR. OUELLETTE:** When you come out of there,
7 you tell me how you'll feel.

8 **MR. CALLAGHAN:** I just didn't know the
9 phrase. Thank you very much.

10 **THE COMMISSIONER:** Thank you.

11 Now, what we are going to do, Mr. Ouellette,
12 is we are going to have a conversation about procedures.

13 **MR. OUELLETTE:** I was trying to avoid going
14 here in this subject matter.

15 **THE COMMISSIONER:** Sure.

16 **MR. OUELLETTE:** They brought me here.

17 **THE COMMISSIONER:** I'll take care of that.
18 If you could wait outside with the
19 counsellor, I will call you back when you are needed.

20 **MR. OUELLETTE:** Thanks for your patience,
21 Commissioner.

22 **THE COMMISSIONER:** No problem. Thank you.
23 Sir, if you can wait outside, we are going
24 to have a little discussion.

25 **MR. OUELLETTE:** Oh!

1 A lot of censoring going on, eh? That's how
2 it starts.

3 **MR. CALLAGHAN:** Sir, it is no surprise where
4 I am going. I mean, this man has frankly got some serious
5 problems and he makes up stories. And I think we need --
6 and I'm suggesting this is made up, and I'm suggesting that
7 his other stories are made up, and it's partly -- I hope
8 nothing is going to be communicated to him, but that --
9 it's a real issue.

10 It's a real issue when we get an allegation
11 such as the one we have that frankly is made two years
12 after -- two years after, for example, he even goes to the
13 OPP.

14 And to understand how the institutions dealt
15 with him, not just the stories, how they dealt with him,
16 they have to understand who this person is.

17 There is a certain understanding of who he
18 is and when he talks about these mind control experiments,
19 as to what he truly believes happened, he truly believes it
20 happened.

21 And I'm going to suggest to you at the end
22 of the day that the story regarding the Cornwall Police is
23 equally fictitious.

24 I think you have to hear how much he
25 believes it.

1 **THE COMMISSIONER:** Why it's fictitious?
2 Isn't it the institutional response -- like did your
3 institution know at the time that he believed this thing?

4 I mean the whole thing, as I understand it,
5 is he made a complaint, and the idea is how did you
6 respond? And how did you find him when you responded to
7 all of this? So this is really ---

8 **MR. CALLAGHAN:** I think that there are two
9 elements in this.

10 I think that what is being proffered is a
11 statement that the chief of police, back in 1978,
12 threatened him with respect to Hickerson again. That, and
13 it will be our submission today, is completely and utterly
14 fictitious.

15 Second, then there is the issue of the
16 subsequent '83 event, which we say '83 is when he says that
17 the officers picked him up and took him out to the dike.

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

19 **MR. CALLAGHAN:** Equally fictitious. But
20 those aren't there for -- those are not being called for --
21 they are called for the truth of the facts.

22 **THE COMMISSIONER:** No, they're not. No,
23 they're not.

24 **MR. CALLAGHAN:** Well, I suggest ---

25 **THE COMMISSIONER:** No, they're not.

1 **MR. CALLAGHAN:** --- the public is. I don't
2 know if you saw the headline today. The public is looking
3 at this saying, my God!

4 I mean I think the public needs to
5 understand what we are dealing with, so that they can
6 assess it, and this is part of the understanding.

7 **THE COMMISSIONER:** No.

8 No, the public has to understand that this
9 gentleman went and made allegations of that to the OPP.
10 How it was handled and how people responded to that is
11 relevant.

12 **MR. CALLAGHAN:** But in the face of the
13 rumour and the innuendo in the community ---

14 **THE COMMISSIONER:** No.

15 **MR. CALLAGHAN:** --- that there is a cover-up
16 and the man is saying that the chief of police wouldn't
17 respond and then five years later sends out people.

18 **THE COMMISSIONER:** Well ---

19 **MR. CALLAGHAN:** I think we are entitled to
20 know whether this man can tell a straight story.

21 **THE COMMISSIONER:** No. I ---

22 **MR. CALLAGHAN:** He fixates on things.

23 **THE COMMISSIONER:** Pardon me?

24 **MR. CALLAGHAN:** He fixates on things. He
25 fixates on things.

1 **THE COMMISSIONER:** Fine.

2 **MR. CALLAGHAN:** And it makes for -- he
3 doesn't -- you can't tell the story of this man without
4 understanding him and also the institutional response had
5 to deal with him. Emma Wilson-King had to deal with a guy
6 who has severe problems and had to make sense ---

7 **THE COMMISSIONER:** The important thing with
8 Emma ---

9 **MR. CALLAGHAN:** Is that one comment.

10 **THE COMMISSIONER:** --- the police officer,
11 is what did she know of him at the time? Did she deal with
12 him fairly? Did she deal with him appropriately? Did she
13 deal with him according to the guidelines that she had to
14 do as a police officer?

15 Point. That's it, that's all.

16 **MR. CALLAGHAN:** So we are not going to have
17 any conclusion as to whether or not -- I just want to be
18 clear -- that the events surrounding the chief of police
19 alleging to be doing what he did, the officers allegedly
20 doing -- that's never going to be an issue in this Inquiry?

21 Because if it's not, then I can sort of
22 truncate it, but I've got officers out there who are
23 completely perplexed by the fact that their name, one of
24 whom is a civilian, who he says put him up against the
25 wall.

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

2 **MR. CALLAGHAN:** I mean, it's a small
3 community.

4 **THE COMMISSIONER:** Then ---

5 **MR. CALLAGHAN:** I don't know whether those
6 -- if those issues are off the table, that's fine.

7 **THE COMMISSIONER:** Those issues are off the
8 table.

9 **MR. CALLAGHAN:** All right.

10 **THE COMMISSIONER:** Let's call the witness
11 back in, please.

12 **MR. MANSON:** I'm sorry. I didn't hear the
13 last thing?

14 **THE COMMISSIONER:** It's off the table.
15 Whether or not it's true or not, really is not relevant at
16 this point.

17 What is relevant is the -- well, wait a
18 minute, before we go back in. Moment, Madam Clerk.

19 Anybody have any comments about that then?

20 What I am saying is that with respect to
21 this ---

22 **MR. CALLAGHAN:** Sorry, sir.

23 **THE COMMISSIONER:** With respect to this
24 witness, whether or not he was taken into custody and
25 brutalized or threatened is part of the -- what I need to

1 know is this is the complaint he made. How the institution
2 responded to that is important, and so whether or not it's
3 true is irrelevant to me.

4 Does anybody have any comments about that at
5 this point? Mr. Lee.

6 ---SUBMISSIONS BY/REPRÉSENTATIONS PAR MR. DALLAS LEE:

7 MR. LEE: I just want to make sure it's
8 clear in my mind. Mr. Ouellette gets up there and he
9 alleges he was -- he went to the Chief of Police. A couple
10 of officers threatened him or roughed him up or whatever
11 the situation is.

12 My understanding of what you're saying now
13 is that you're not concerned about the veracity of whether
14 or not that happened. You're not going to rule at the end
15 of the day that he met with the Chief of Police or that the
16 two officers roughed him up. You are going to rule at the
17 end of the day that he went to the police, he made the
18 complaint that that had occurred to him and you're going to
19 analyze the institutional response and you're going to
20 report on the sufficiency of the investigation?

21 THE COMMISSIONER: Right.

22 MR. LEE: Thank you. I have no comment.

23 THE COMMISSIONER: Mr. Manson, do you have
24 any problems with that?

25 ---SUBMISSIONS BY/REPRÉSENTATIONS PAR MR. ALLAN MANSON:

1 **MR. MANSON:** I'm just trying to get this
2 straight in my mind. I was supportive of Mr. Dumais'
3 objection in the sense that we have some understanding of
4 Mr. Ouellette and Mr. Ouellette's background and ---

5 **THE COMMISSIONER:** M'hm. That too.

6 **MR. MANSON:** --- some of the issues that
7 have -- or conditions that have burdened him, all of which
8 certainly affect his credibility, and I thought there was
9 no need to go any deeper into those matters.

10 **THE COMMISSIONER:** Well, that's number one,
11 yes.

12 **MR. MANSON:** With respect to the
13 allegations, Mr. Commissioner -- the reason I'm speaking
14 slowly is because I'm trying to think before the words come
15 out of my mouth.

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

17 **MR. MANSON:** It seems to me some of them
18 might appropriately fit within the rubric of institutional
19 response.

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

21 **MR. MANSON:** And therefore, when X goes to
22 agency Y to make a complaint ---

23 **THE COMMISSIONER:** Yes.

24 **MR. MANSON:** --- how agency Y pursues the
25 complaint is certainly relevant.

1 **THE COMMISSIONER:** Yes.

2 **MR. MANSON:** How they deal with X is also,
3 to some extent, relevant.

4 **THE COMMISSIONER:** How they deal with it,
5 yes.

6 **MR. MANSON:** Yes. And so long as the
7 questions relate to an institutional response in that sense
8 ---

9 **THE COMMISSIONER:** Yes.

10 **MR. MANSON:** --- then it would seem to me
11 they are within your mandate.

12 **THE COMMISSIONER:** Yes.

13 **MR. MANSON:** So if we just assume some
14 hypothetical witness who said "I went to see Officer Dumais
15 and he refused to talk to me and pushed me down the
16 stairs," that is a form of institutional response.

17 **THE COMMISSIONER:** Yes.

18 **MR. MANSON:** As a result, Officer Dumais --
19 hypothetical Officer Dumais ought to be entitled to say
20 "That's not how it happened." That's where -- when you
21 said that's off the table, that's what caught me.

22 **THE COMMISSIONER:** What is off the table --
23 well, okay, let's see now. It's off ---

24 **MR. MANSON:** The background allegations --
25 I'm sorry, Mr. Commissioner.

1 **THE COMMISSIONER:** Go ahead. Go ahead.

2 **MR. MANSON:** The background allegations that
3 would bring someone to seek out an institution. This
4 Commission is not looking into those, but it is looking
5 into institutional response.

6 **THE COMMISSIONER:** Yes.

7 **MR. MANSON:** So when an alleged victim goes
8 to an institution, what they say about how the institution
9 pursued their complaint and how the institution treated
10 them, it seems to me is within the mandate of this
11 Commission and is importantly within the mandate.

12 **THE COMMISSIONER:** Okay. So how does that
13 distinguish from what I'm saying then? Where is there a
14 conflict?

15 **MR. MANSON:** Well, when you said it's off
16 the table ---

17 **THE COMMISSIONER:** What I'm saying is that
18 the truth of whether or not the complaint is true is
19 irrelevant.

20 **MR. MANSON:** The underlying allegations.

21 **THE COMMISSIONER:** The underlying
22 allegations are irrelevant.

23 **MR. MANSON:** Yes.

24 **THE COMMISSIONER:** What's important is what
25 did the institution do with that complaint? How did they

1 react? All right.

2 **MR. MANSON:** Yes.

3 **THE COMMISSIONER:** And so that's it. So
4 what else can I tell you?

5 **MR. MANSON:** But in that respect, it seems
6 to me Mr. Callaghan can, both during the institutional
7 response it would be called that by Commission counsel, but
8 also now with the witness deal with a response.

9 **THE COMMISSIONER:** Which response?

10 **MR. MANSON:** Well, I take it at some point
11 Mr. Callaghan is going to want to say to him, "You allege
12 that when you went to see Chief Shaver, he did X" and Mr.
13 Callaghan wants to suggest that that's false.

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

15 **MR. MANSON:** And that ought to be on the
16 table. I just want to make sure we -- because it's not the
17 underlying allegation that brings a witness to Cornwall
18 Police; it's the response of the Cornwall Police.

19 **THE COMMISSIONER:** And what was the response
20 of the Cornwall Police?

21 **MR. MANSON:** Well, Mr. Dumais dealt with it
22 very, very briefly, but there are allegations that they
23 were abusive, to put it -- to Mr. Ouellette.

24 **THE COMMISSIONER:** By Constable -- you mean
25 by constables unknown when they brought him in and they

1 forced the table against him? Those are underlying
2 allegations.

3 **MR. MANSON:** I think we're on the same
4 track, but we're -- because we discussed this at the
5 counsel meeting yesterday. My position was general beefs
6 that the witness may have about the Cornwall Police Service
7 is not on the table.

8 **THE COMMISSIONER:** Okay.

9 **MR. MANSON:** But how the Cornwall Police
10 Service dealt with and responded to Mr. Ouellette when he
11 went to make a complaint about alleged sexual abuse ---

12 **THE COMMISSIONER:** Okay, m'hm.

13 **MR. MANSON:** --- the allegations of sexual
14 abuse are not on the table.

15 **THE COMMISSIONER:** No.

16 **MR. MANSON:** But how they responded are on
17 the table.

18 **THE COMMISSIONER:** Yes.

19 **MR. MANSON:** And if Mr. Callaghan has the
20 view that this witness may not have been completely
21 accurate in describing some of those responses ---

22 **THE COMMISSIONER:** Right.

23 **MR. MANSON:** --- it seems to me he's
24 entitled to pursue that.

25 **THE COMMISSIONER:** Yes.

1 **MR. MANSON:** My agreement with Mr. Dumais
2 was he can do that. We know enough about Mr. Ouellette's
3 background. We don't need to pursue these issues line by
4 line, going through the Survivor Impact Statement to show
5 that there have been times in his life where he has fixated
6 on certain matters. We know that now. It's time to move
7 on, and if he wants to challenge the witness, fine.

8 I became concerned when you said that's off
9 the table.

10 **THE COMMISSIONER:** Off the -- well, okay.
11 What I meant by that was simply that the underlying
12 allegations are not on the table.

13 **MR. MANSON:** Exactly.

14 **THE COMMISSIONER:** Okay.

15 **MR. MANSON:** Thank you.

16 **THE COMMISSIONER:** Mr. Callaghan ---

17 ---**SUBMISSIONS BY/REPRÉSENTATIONS PAR MR. JOHN CALLAGHAN:**

18 **MR. CALLAGHAN:** I'm still confused.

19 **THE COMMISSIONER:** Pardon me?

20 **MR. CALLAGHAN:** I'm still confused.

21 **THE COMMISSIONER:** Oh.

22 **MR. CALLAGHAN:** I break it down this way.

23 He makes allegations that he was assaulted by two
24 gentlemen. He reports it, he says, to the Chief of Police.
25 Something happens five years later. It's then investigated

1 10 years after that or 15 years later.

2 Are we -- I thought you were saying that you
3 want to focus on the investigation that Mr. Snyder did --
4 that Constable Snyder did when he came in to complain about
5 this earlier conduct.

6 If we're talking about -- if what I'm
7 hearing Mr. Manson say, "No, no, no, we have to talk about
8 what the response of the Chief of Police was in '78 when he
9 alleges he came to speak to him," I'm not -- I don't know
10 what's on and off.

11 **THE COMMISSIONER:** Well, all right. It's
12 simple. If you go -- if he says he went to complain to the
13 Chief of Police, right?

14 **MR. CALLAGHAN:** Right.

15 **THE COMMISSIONER:** And you say -- I don't
16 know what you say -- "He didn't," if that's what you say,
17 well, then you can nail him down or you can try to narrow
18 the scope as to when he went, that kind of thing, anywhere
19 you go, because that's part of the institutional response.
20 He says "I went" and you say he didn't.

21 **MR. CALLAGHAN:** Right.

22 **THE COMMISSIONER:** Right? But with respect
23 to the rest, it's irrelevant.

24 **MR. CALLAGHAN:** Well, part of this -- where
25 I was going to go next was part of it was the timing.

1 Unless I'm missing something, there's nothing in the record
2 until November -- October 28th, 1999, two years later,
3 before he raises these allegations.

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

5 **MR. CALLAGHAN:** He's in there with -- '99, I
6 should say. He's in there with Nadeau and we're going to
7 get to Dunlop, and all of this is coming out, including the
8 Survivor Impact Statement.

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

10 **MR. CALLAGHAN:** Which is in part why I was
11 going there, to get into what he's doing with Nadeau, what
12 he's doing -- how it is that all of a sudden this
13 allegation comes out that's against him and it may mean
14 that -- I mean, he's got -- not unlike a lot of them.

15 This man has got a lot of pent up angst
16 against the police. There are five or six occurrences
17 between '96 and when he starts dealing with the OPP which
18 he fixates on, which you're dealing with in terms of him
19 and his kids and he wants to do this and that, but that's
20 part of what's going on. That's what these police officers
21 -- you read Brian Synder's notes and most of it is about
22 that.

23 **THE COMMISSIONER:** M'hm, that will be part
24 of the institutional response. You can tell me all about
25 what you did at that time, but you can't come back here in

1 2007 and then impute knowledge to your police officers
2 which they may or may not have had about his state of mind.
3 You can't do that -- the straight and narrow.

4 And I agree with Mr. Manson and with Me
5 Dumais. You know, we have given you some latitude about
6 this thing that he says he had in prison. The point has
7 been made. Let's go on.

8 **MR. CALLAGHAN:** Thank you.

9 **THE COMMISSIONER:** Let's bring the witness
10 back, please.

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

12 **--- KEITH OUELLETTE, Resumed/Sous le meme serment:**

13 **MR. OUELLETTE:** Hi.

14 **THE COMMISSIONER:** Mr. Ouellette, in your
15 absence we have discussed a line of questioning that we had
16 been pursuing and we've ironed out those problems.

17 And so now Mr. Callaghan will continue to
18 ask you questions for another 15-20 minutes and then we'll
19 break for lunch.

20 **MR. OUELLETTE:** Okay.

21 **THE COMMISSIONER:** All right?

22 **MR. OUELLETTE:** Yes.

23 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATORIE PAR MR.**

24 **CALLAGHAN (cont'd/suite):**

25 **MR. CALLAGHAN:** Sorry about that, Mr.

1 Ouellette. We are just trying to work things out. It's
2 not always easy.

3 Where I was at was we were talking about
4 your complaint and I just -- the Victim Impact Statement
5 which you gave, did you originally give it to Mr. Nadeau or
6 who did you give it to?

7 **MR. OUELLETTE:** This complaint was filed
8 with the Criminal Injuries Compensation Board as an impact
9 statement as to why I believed that I deserved to be
10 compensated.

11 **MR. CALLAGHAN:** There is not a date on it.
12 Do you know what happened or when ---

13 **MR. OUELLETTE:** As I said, because when you
14 mention dates I don't really recall them, but that's
15 because I don't pay attention to dates due to time dilation
16 and compression.

17 **THE COMMISSIONER:** Okay. You don't remember
18 what date it was?

19 **MR. OUELLETTE:** It's approximately -- well,
20 if you look up Dick Nadeau's website there should be a date
21 on the website thing. It's in and about one month from the
22 time that he printed it on his website.

23 **MR. CALLAGHAN:** So ---

24 **MR. OUELLETTE:** So that would give you a
25 neighbourhood idea of when I printed this.

1 **MR. CALLAGHAN:** I take it you knew Mr.
2 Nadeau before you made the Victim Impact Statement?

3 **MR. OUELLETTE:** Yes, I believe I did.

4 **MR. CALLAGHAN:** Okay.

5 **MR. OUELLETTE:** Just prior to.

6 **MR. CALLAGHAN:** Just prior to, and he asked
7 for it or did you give it or did you work together on it?

8 **MR. CALLAGHAN:** No, I wanted -- he didn't
9 ask for it specifically. He offered to put it on the
10 internet. He asked me to consider it because he was
11 looking for other people like to kind of like -- he was
12 doing research, like he wanted to make a case.

13 **MR. CALLAGHAN:** Okay.

14 **MR. OUELLETTE:** To present to the public.
15 So he asked me to offer up this, which I was very willing
16 to comply with his request. I think he asked me for the
17 information.

18 **MR. CALLAGHAN:** When did you -- so can you
19 pinpoint when you met Mr. Nadeau? Was it before or after
20 you met Mr. Dunlop?

21 **MR. OUELLETTE:** Well, as I said before -- I
22 knew Mr. Nadeau just like that, you know just by seeing
23 him, but I never really knew him personally until much
24 later after approximately the time when I met Perry Dunlop.

25 **MR. CALLAGHAN:** It's about the same time.

1 **MR. OUELLETTE:** About the same time.

2 **MR. CALLAGHAN:** And I want to show you a
3 document. It's a Commission document, and if I could just
4 get one second. It was notices given by the CCR.

5 **(SHORT PAUSE/COURTE PAUSE)**

6 **MR. CALLAGHAN:** This is from Mr. Dunlop's
7 notes and I believe it's -- and I hope I'm going to get
8 this right. It's big type 1091050. The doc number is
9 116241 -- 116241.

10 **THE COMMISSIONER:** You won't have that right
11 now, Mr. Ouellette. We'll have to call it up.

12 **MR. OUELLETTE:** I'm just curious, has the
13 Commissioner read this entirely?

14 **THE COMMISSIONER:** Yes.

15 **MR. OUELLETTE:** I'm glad.

16 **THE COMMISSIONER:** Is this an exhibit
17 already?

18 **MR. CALLAGHAN:** I don't believe so unless
19 it's -- it might have been in a bigger pile, but I think we
20 just had one page today.

21 **THE COMMISSIONER:** Okay.

22 **MR. CALLAGHAN:** There should be maybe two
23 pages.

24 **MR. CRANE:** Madam Clerk, the Bates page is
25 1091540.

1 It's embarrassing to have others do your
2 reading for you.

3 **THE COMMISSIONER:** All right.

4 So Exhibit No. 595 you say is an excerpt of
5 Officer Dunlop's notes?

6 **MR. CALLAGHAN:** Yes.

7 **THE COMMISSIONER:** Okay.

8 **--- EXHIBIT NO./PIÈCE NO. P-595:**

9 (1091540) Cornwall Police Services Officer's
10 Notes by Perry Dunlop re: Keith Ouellette
11 dated November 14th, 1997

12 **MR. CALLAGHAN:** Now, this is -- they are
13 basically two notes. I'll show you the other one when we
14 get to the time sequence, but this is November 12th, '97.
15 It says:

16 "Keith Ouellette/called returned..."

17 And gives a phone number:

18 "...assaulted; Ken Seguin, Richard
19 Hickerson. His brother approached.
20 CAS notified."

21 Do you see that?

22 **MR. OUELLETTE:** Yes. I didn't assault Ken
23 Seguin.

24 **MR. CALLAGHAN:** No, no. I don't think you
25 should apply that that's what he is saying. I think he is

1 just handwriting as he speaks. Forgive me if I offend Mr.
2 Dunlop, but I don't think that's what he intended.

3 Does that sort of ring a bell though? This
4 is about ---

5 **MR. OUELLETTE:** Absolutely.

6 **THE COMMISSIONER:** 12th of November, 1997.
7 Is that all right?

8 **MR. OUELLETTE:** Well, again, the date could
9 be off or on by a couple of months but it sounds about
10 right, yes.

11 **MR. CALLAGHAN:** Well, let me ask you this.
12 I mean, you go -- you are incarcerated, I think you say, up
13 to the 28th -- October 28, 1997. I think that's what we
14 just heard; correct?

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

16 **MR. CALLAGHAN:** And you go to the OPP on
17 October 30th, 1997.

18 **MR. OUELLETTE:** Approximately.

19 **MR. CALLAGHAN:** Okay. Well, approximately
20 or?

21 **MR. OUELLETTE:** Well, I as I said, when you
22 are in jail you don't pay attention to what day it is
23 because you're counting your days.

24 **MR. CALLAGHAN:** Okay. But you don't have
25 any reason to doubt the OPP's date of October 30th, '97?

1 **MR. OUELLETTE:** Well, I know that the OPP
2 attended the jail where I was at. That fact I am certain
3 of.

4 **MR. CALLAGHAN:** So he is contacting you
5 within less than two weeks of you giving your statement.
6 Can you tell us how that happened?

7 **MR. OUELLETTE:** That sounds about right.

8 **MR. CALLAGHAN:** And how did that come about?

9 **MR. OUELLETTE:** He contacted me. I didn't
10 contact him first. He contacted me.

11 **MR. CALLAGHAN:** So he was soliciting your
12 information?

13 **MR. OUELLETTE:** He wasn't soliciting it. He
14 wanted to have an interview with me. He wanted to meet
15 with me.

16 **MR. CALLAGHAN:** Did he tell you how he came
17 across your name?

18 **MR. OUELLETTE:** No, he was just saying "I
19 came to learn that the probation officer was Ken Seguin and
20 I wanted to confirm that". And when I confirmed it, he
21 says, "I need to talk to you about it".

22 **MR. CALLAGHAN:** And can you be clear whether
23 or not your first contact with Mr. Dunlop was before or
24 after you had the meeting with the OPP? This would suggest
25 after. Would that ---

1 **MR. OUELLETTE:** I think it's just after.

2 **MR. CALLAGHAN:** And so you don't know the
3 source nor have you ever learned the source of Mr. Dunlop's
4 information?

5 **MR. OUELLETTE:** Until I saw van Diepen's
6 stuff, I had no clue at all.

7 **MR. CALLAGHAN:** And what do you say -- what
8 does it mean by "CAS notified"? Do you know what that
9 means?

10 **MR. OUELLETTE:** "CAS notified". I think I
11 might have mentioned that I had told them some stuff
12 pertaining to some abuses that were going on in Cornwall
13 and that they had ignored it, by phone and face-to-face
14 with some of my workers.

15 **MR. CALLAGHAN:** And did you meet with Mr.
16 Dunlop thereafter, after November 12th '97?

17 **MR. OUELLETTE:** As I said before, he made
18 several attempts to meet with me.

19 **MR. CALLAGHAN:** Right.

20 **MR. OUELLETTE:** The only time that I met
21 with him was in his basement at his home approximately
22 seven days before he moved from Cornwall.

23 **MR. CALLAGHAN:** And you don't happen to know
24 when he moved?

25 **MR. OUELLETTE:** No, but it was in the

1 wintertime sometime. It was in the late fall or early
2 winter.

3 **MR. CALLAGHAN:** Do you remember what was
4 happening in your case at the time? Was it before you
5 spoke to the -- you speak to the OPP -- and I'll go there
6 in a second -- but you seemed to speak to the OPP about the
7 allegations regarding the Cornwall Police two years later
8 in October 1999. Do you think it was before or after that?

9 **MR. OUELLETTE:** I'm not sure.

10 **MR. CALLAGHAN:** You're not sure. It could
11 be before though?

12 **MR. OUELLETTE:** I'm not sure.

13 **MR. CALLAGHAN:** And at this time had you
14 told the OPP about your brother?

15 **THE COMMISSIONER:** At what time?

16 **MR. CALLAGHAN:** November 12th '97, referring
17 back to the exhibit.

18 **MR. OUELLETTE:** I'm sure I mentioned my
19 brother in every case.

20 **MR. CALLAGHAN:** I want to show you a
21 document. I'm going to ask to put to you the OPP's file
22 that's been produced. I'm concerned with specific pages,
23 but I suspect they are going to have to put the whole thing
24 to you. It's document 116196.

25 **(SHORT PAUSE/COURTE PAUSE)**

1 **MR. CALLAGHAN:** I don't know whether -- yes,
2 okay.

3 **THE COMMISSIONER:** Thank you, Exhibit 596.

4 **--- EXHIBIT NO./PIÈCE NO. P-596:**

5 (116196) Crown Brief Regina v. John
6 Christopher Wilson

7 **MR. OUELLETTE:** Thank you very much.

8 **THE COMMISSIONER:** Is there anything in here
9 that deals with confidential matters?

10 **MR. CALLAGHAN:** Not that I was able to
11 disclose, but I'll ask Commission counsel if he's got any
12 views. All of this was part of the Crown brief, for one.
13 I'm hearing no.

14 **MR. DUMAIS:** I can't answer one way or
15 another. It's a very large document.

16 **THE COMMISSIONER:** Well ---

17 **MR. CALLAGHAN:** It's the statements and the
18 notes.

19 **THE COMMISSIONER:** If we recall way back
20 when about confidentiality measures, I thought I had
21 indicated that those who wanted to use and file exhibits,
22 they were kind of primarily in charge of the viewing to
23 make sure we're not breaching any confidentiality and;
24 second of all, those who have an interest in the document,
25 the witness' lawyer and stuff, would be going through this

1 and you'll be saving the innocent from unwanted public and
2 unnecessary public scrutiny.

3 **MR. CALLAGHAN:** Well, having read it I
4 didn't see anything in it that I would find of that
5 character and most of it -- much of it, not all of it, but
6 much of it is already in evidence by way of his interviews,
7 et cetera.

8 **THE COMMISSIONER:** That's fine.

9 **MR. CALLAGHAN:** Mr. Ouellette, I want to
10 take you -- and you're going to have to follow me -- up on
11 the top pages you'll see that these -- the pages -- there
12 is a big long number. It's a column number and it goes /1
13 and it continues on. I'm at doc -- at page 124, and if you
14 -- there is another sequencing number that is at the top
15 and it has 122, if that helps, the two numbers.

16 **THE COMMISSIONER:** So is it page 0124?

17 **MR. CALLAGHAN:** It's ---

18 **THE COMMISSIONER:** Top right-hand corner?

19 **MR. CALLAGHAN:** --- 0122, and I am going to
20 be referring to the -- and I should give you the Bates page
21 numbers. The Bates page numbers start at 1086238 and I'll
22 be referring over to 1086259.

23 **THE COMMISSIONER:** Like all those pages or
24 just that one?

25 **MR. CALLAGHAN:** All of them. Those are the

1 pages I wanted just to direct Mr. Ouellette's attention to.

2 **THE COMMISSIONER:** All right.

3 So, Mr. Ouellette, you have the page 0122?

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

5 **THE COMMISSIONER:** Okay.

6 **MR. CALLAGHAN:** All right.

7 Sir, as I understand it from the OPP's
8 notes, and correct me if I have got this wrong, is that in
9 October -- late October, October 28th, I believe, 1999, you
10 give this to one of the OPP officers.

11 **THE COMMISSIONER:** You give what, this?

12 **MR. CALLAGHAN:** This bundle of documents to
13 which I just referred him.

14 **MR. OUELLETTE:** At some point I did this,
15 yes.

16 **MR. CALLAGHAN:** And I take it -- do these
17 all go together, because on the last page it's signed
18 September 1st, 1999. Do you see that?

19 **MR. OUELLETTE:** At the very end?

20 **MR. CALLAGHAN:** Right. They seem to be
21 broken down to various complaints.

22 **MR. OUELLETTE:** Yes.

23 **MR. CALLAGHAN:** At the very end it seems to
24 be. Do you think you did it about that time?

25 **MR. OUELLETTE:** Yes. This was the draft

1 that I used to send to the Criminal Injuries Compensation
2 Board.

3 MR. CALLAGHAN: Right. And did the OPP ask
4 for this or was this something that you ---

5 MR. OUELLETTE: I think I gave it
6 voluntarily. I was asking for help.

7 MR. CALLAGHAN: Right.

8 By this time they had been investigating for
9 almost two years; correct?

10 MR. OUELLETTE: I assume so by the dates.

11 MR. CALLAGHAN: All right.

12 And so this is where, amongst others, there
13 is a complaint. If you can go to page 134, Bates 106250,
14 this is where you first give the complaint regarding the
15 Cornwall Police; correct?

16 MR. OUELLETTE: Yes.

17 MR. CALLAGHAN: And that's investigated by
18 Constable Brian Snyder later?

19 MR. OUELLETTE: M'hm.

20 MR. CALLAGHAN: Correct? Okay.

21 MR. OUELLETTE: M'hm. The dates are a
22 generalization of approximately when I thought ---

23 MR. CALLAGHAN: Well, we'll get to the
24 dates, sir.

25 MR. OUELLETTE: Okay.

1 **MR. CALLAGHAN:** We'll get to the dates. And
2 then if I could take you over then to page 137, you also
3 had a complaint against Shawn Martel who is a police
4 officer with the Cornwall Police; correct?

5 **MR. OUELLETTE:** Yes.

6 **MR. CALLAGHAN:** And it had to do with his
7 investigation of a *Highway Traffic Act*?

8 **MR. OUELLETTE:** Yes.

9 **MR. CALLAGHAN:** And so you put that in with
10 your complaints regarding the chief of police conduct that
11 you spoke of, the police officers. And I take it the other
12 complaints in here, if we'll take a look, include your
13 complaint against your brother, your complaint against Ken
14 Seguin and your complaint against Dick Hickerson; correct?

15 **MR. OUELLETTE:** Yes, general systemic
16 harassment by authorities who are supposed to be in place
17 to protect and serve to convict.

18 **MR. CALLAGHAN:** And is that how you viewed,
19 for example, the complaint against Shawn Martel?

20 **MR. OUELLETTE:** Shawn Martel, by personal
21 experience, is the most corrupt officer I've ever had the
22 pleasure or displeasure of knowing.

23 **THE COMMISSIONER:** Do we need to go through
24 this, Mr. Callaghan?

25 **MR. CALLAGHAN:** Well, I'm just a little

1 shocked at the answer but ---

2 **THE COMMISSIONER:** Well, you're the one who
3 is making the questions. Come on.

4 **MR. CALLAGHAN:** Well, no, it is actually
5 quite important to understand what he is complaining about.
6 This is investigated ---

7 **MR. OUELLETTE:** I'm complaining about ---

8 **MR. CALLAGHAN:** --- at the same time.

9 **MR. OUELLETTE:** I'm complaining about
10 someone hitting me broadside, drunk, throwing beer bottles
11 out of their truck, everybody smelling of alcohol, asking
12 for him to give him, the driver, which was undetermined, a
13 drug or alcohol test which he refused and which was my
14 right to have.

15 **THE COMMISSIONER:** Mr. Ouellette ---

16 **MR. CALLAGHAN:** So that's why you call Shawn
17 Martel the most corrupt officer? He charged the man with a
18 *Highway Traffic Act* offence and that's how you address the
19 concern?

20 **MR. OUELLETTE:** He tried it as -- they tried
21 it as refusing to stop for a stop sign.

22 **THE COMMISSIONER:** Easy -- enough.

23 **MR. CALLAGHAN:** Well ---

24 **THE COMMISSIONER:** Show me the relevance.

25 **MR. CALLAGHAN:** If I can ask the witness to

1 leave?

2 **THE COMMISSIONER:** Yes, lunch time.

3 While you are out for lunch, we will discuss
4 this other administrative matter. We will see you back at
5 two o'clock.

6 **MR. OUELLETTE:** I would like to know the
7 reason for that.

8 **THE COMMISSIONER:** The reason for what?

9 **MR. OUELLETTE:** For my having to be excused
10 from this when I can explain it.

11 **THE COMMISSIONER:** Because ---

12 **MR. OUELLETTE:** Because what he is trying to
13 do is discredit me and make me look discreditable when in
14 fact he is quite aware of what is going on here.

15 **THE COMMISSIONER:** Do you want me to answer
16 you that question now?

17 **MR. OUELLETTE:** Yes.

18 **THE COMMISSIONER:** Okay. As a Commissioner,
19 I control what questions are asked and what questions are
20 not asked. At some point, when I have some difficulties as
21 to what questions should be asked or not be asked, it is a
22 normal procedure, not just for you but for everyone in this
23 Inquiry, any court system, that we ask the witness to leave
24 so that we can discuss the matter on an administrative
25 basis. It has nothing to do with you per se. It has to do

1 with the conduct of the Inquiry.

2 So sometimes there are things that are a
3 bigger picture than just one witness, and that's why I'm
4 going to ask you to excuse us for a moment while we discuss
5 those issues. All right? Let's not forget your lawyer is
6 here and he is representing your interests in this matter.

7 **MR. OUELLETTE:** Well, I'd just like to state
8 for the record that a picture is composed of very many
9 amount of pixels.

10 **THE COMMISSIONER:** Yes.

11 **MR. OUELLETTE:** And if you take one pixel
12 out, you don't get the whole picture.

13 **THE COMMISSIONER:** Thank you.

14 **(WITNESS WITHDRAWS/TÉMOIN SE RETIRE)**

15 **---SUBMISSIONS BY/REPRÉSENTATION PAR MR. JOHN CALLAGHAN:**

16 **MR. CALLAGHAN:** He makes two complaints that
17 are tied up together, the Shawn Martel complaint and the
18 complaint against the Cornwall Police. Those are both
19 investigated ---

20 **THE COMMISSIONER:** Well, that's news to me.
21 I don't know that.

22 **MR. CALLAGHAN:** They were both -- well, it
23 wasn't put to you, but it was both investigated by
24 Constable Snyder at the same time.

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

1 **MR. CALLAGHAN:** And he investigated them
2 both. On both occasions, and Constable Snyder will testify
3 that this witness said he'd drop it if they would agree to
4 give him criminal compensation for both complaints.

5 In terms of the offence regarding Constable
6 Martel, who, just to be clear, investigated a *Highway*
7 *Traffic Act* event where he was -- Mr. Ouellette was hit by
8 a car. His wife was in the car. Mr. Ouellette has
9 maintained that the other driver was drinking and he, for
10 some reason, thinks he would have gotten his insurance
11 proceeds or a criminal compensation complaint and,
12 therefore, is insisting on making the complaint.

13 He is -- the two come up together because
14 he's fixated, and he's fixated on the police. He is
15 fixated on the police because he thinks he's harassing
16 them. He's fixated on the police because of Mr. Martel.
17 His complaints regarding Constable Martel are replete in
18 the documents, including documents with corrections where
19 he dates the end of the world seven years after that
20 accident. I think the man has a fixation on the police,
21 and he has a fixation because he thinks that his life was
22 highly disrupted because of a car accident, which he then
23 blames -- he can't pick up and deal with his children. He
24 then blames that in part on why the CAS takes his children,
25 notwithstanding there are reports from 1996 right up to

1 1997 when he starts dealing with the OPP, where he's
2 threatening to blow up his children, blow up Mr. Cleary, an
3 MP. The man is fixated on the police and he's fixated that
4 he thinks he's been harassed. He said it time and again.
5 As he says, you can't take out a pixel.

6 This is his pixel. And this complaint was
7 done at the same time by Constable Snyder. He did them
8 exactly the same. The interviews were done simultaneously.
9 He reviewed them the same, at the same time.

10 So if we're going to review Constable
11 Snyder's conduct, then obviously the complaint regarding
12 Mr. -- Constable Martel is relevant, I would suggest.

13 But beyond that, I've got to be able to show
14 -- give you a motive as to why. In 1999, he comes up and
15 makes an allegation that he hasn't made at all to anybody,
16 notwithstanding he's been in and out of police. He's
17 sitting down with Corrections, talking with Corrections
18 about the car accident in 1994, never mentioning anything
19 regarding the incident regarding Chief Shaver. I've got to
20 be able to demonstrate to you that it's just not -- it's
21 not plausible. It's just not plausible.

22 **THE COMMISSIONER:** What's not plausible?

23 **MR. CALLAGHAN:** It's not plausible, the
24 incident that he refers to regarding the Chief of Police.
25 It's not plausible that you make this statement all of a

1 sudden in October of 1999, having told no one in authority
2 about it, nobody. He tells everybody about the Shawn
3 Martel accident. He complains constantly about the police
4 harassing him because of his kids, because what's
5 underlying this throughout this period is the CAS is
6 removing his kids because he threatens them.

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

8 **MR. CALLAGHAN:** And that has him very angst.
9 There are, I think, five or six occurrences where we have
10 to go out and deal with him. As he indicated, he's written
11 everybody from a Member of Parliament to the Prime Minister
12 about it and he's fixated on it.

13 And all of a sudden, to get attention, it
14 would be my submission, at the end of the day he comes
15 forward with this complaint two years after Project Truth
16 is investigated. It's just -- it's a strange belief, and I
17 think I've got to be able to demonstrate to you why I say
18 that at the end of the day.

19 These are very serious allegations against
20 the police.

21 **THE COMMISSIONER:** The one that he went and
22 seen two police chiefs?

23 **MR. CALLAGHAN:** Yes, and the subsequent
24 conduct he talks about afterwards.

25 **THE COMMISSIONER:** Of?

1 **MR. CALLAGHAN:** Well, his allegation to us -
2 - his allegation is a little different here today. His
3 allegation to us was he went to see Chief Shaver in '78 and
4 then in 1983 he sent two police officers after him. That's
5 what he told us.

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

7 **MR. CALLAGHAN:** Now he's got it slightly
8 different today or yesterday.

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

10 **MR. CALLAGHAN:** That's very serious, and I
11 can't explain to you this man until you see the whole
12 picture.

13 **THE COMMISSIONER:** Again, whether or not he
14 went and seen Chief Shaver, it's what you did about it.
15 The allegation ---

16 **MR. CALLAGHAN:** Well, I guess I'm confused.
17 I thought Mr. Manson said seeing Chief Shaver is an
18 institutional response. Chief Shaver allegedly sending
19 cops out to rough him up is an institutional response. If
20 those allegations -- and I thought that you concluded that
21 they were an institutional response.

22 If they're not an institutional response
23 that I have to address, then I'm happy to go on to see how
24 Mr. Snyder -- Constable Snyder did the investigation. I'm
25 happy to deal with that.

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

2 **MR. CALLAGHAN:** I mean, I'm happy to go on
3 to Constable Snyder, but I can't have notice of misconduct
4 going to officers and chiefs of police regarding that
5 allegation without putting it all to him, and that's what
6 I'm ---

7 **THE COMMISSIONER:** Notices of misconduct
8 about what?

9 **MR. CALLAGHAN:** Under the ---

10 **THE COMMISSIONER:** About two officers going
11 to rough him up?

12 **MR. CALLAGHAN:** Well, the *Public Inquiries*
13 *Act*.

14 **THE COMMISSIONER:** Okay. Thank you.
15 Does anyone have any comments?

16 ---**SUBMISSIONS BY/REPRÉSENTATIONS PAR MR. PIERRE DUMAIS:**

17 **MR. DUMAIS:** A number of comments, I guess,
18 Commissioner. I just want to be careful that we stay on
19 relevant issues.

20 Mr. Callaghan is correct; Mr. Ouellette has
21 made a number of complaints over the years. He's been
22 arrested a number of times. I tried to deal with those
23 incidents where it was relevant for the purposes of the
24 mandate.

25 The only reason why I even approached the

1 '78, '79 disclosure to the Chief of Police was exactly for
2 that purpose. It was the first time ever that he had
3 disclosed his -- an incident of sexual abuse to someone in
4 authority.

5 I mean, what subsequently happened
6 afterwards and what Cornwall Police Services did
7 afterwards, I think Mr. Callaghan is drawing incorrect
8 conclusions, and for the most part are matters for argument
9 at the end of the day.

10 But, I mean, certainly I didn't hear Mr.
11 Ouellette draw -- indicate that he knew for a fact that it
12 was the Chief of Police that sent the two officers, for
13 one. And, I mean, as you've indicated as well,
14 Commissioner, I think the importance is once Cornwall
15 Police found out about what the allegations are, so when it
16 was transferred back to Sergeant Snyder, what he did. Did
17 he do a proper investigation? Did he leave no stones
18 unturned and was the conclusion -- was Mr. Ouellette
19 advised? Was he treated fairly with that complaint?

20 The Martel -- the Shawn Martel complaint is
21 an entirely different complaint, and I'm not exactly sure
22 what the relevance is other than if Mr. Callaghan wants to
23 make an argument at the end of the day comparing the two
24 investigations, but I mean, it was just a different
25 complaint that was investigated again by Sergeant Snyder.

1 I mean, the only link between the two is the fact that the
2 complaint was given to the OPP at the same time, who then
3 turned it over to Cornwall Police Services to investigate
4 the matter.

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

6 **MR. DUMAIS:** So, I mean, at the end of the
7 day, as you've indicated, Commissioner, I just want to make
8 sure that the questions being put to Mr. Ouellette are
9 relevant.

10 I mean, the fact that he's made a complaint
11 is only that, the fact that he has made a complaint.

12 I mean, I can argue one way or another
13 whether or not Constable Martel did a proper investigation
14 and whether or not Mr. Ouellette believes he did or not.
15 Obviously, he didn't. He complained. It's what they did
16 about it afterwards.

17 **THE COMMISSIONER:** Thank you.

18 Mr. Lee.

19 ---SUBMISSIONS BY/REPRÉSENTATIONS PAR MR. DALLAS LEE:

20 **MR. LEE:** Sir, we are in a different
21 position here than the Cornwall Police or the OPP likely
22 were when dealing with Mr. Ouellette.

23 I mean, we have seen his tendency to lose
24 focus and to shift from one issue to another and obviously,
25 as Mr. Dumais suggests, when he meets with the OPP in '97

1 or '99 or whenever it was that he meets with them and tells
2 them about the Martel incident, they are receiving a
3 complaint and maybe they are duty bound to receive that
4 complaint. Maybe they are not but they decide to listen to
5 him. We are not necessarily in the same position here.
6 You have a mandate that we have to stay within that deals
7 with sexual abuse.

8 The Martel allegation has nothing to do with
9 sexual abuse. It has nothing to do with chiefs of police.
10 It has nothing to do with anything. It's about a car
11 accident and whether or not that was a proper or improper
12 investigation and if the charge laid was proper. It has
13 nothing to do with this.

14 I'm sure Mr. Ouellette would very happily
15 have you adjudicate on whether or not the investigation was
16 proper but it's not why we are here. It's not why we are
17 here at all. It's not relevant.

18 The other comment I want to make is that we
19 need to be careful about Mr. Ouellette's evidence being
20 very badly mischaracterized here. Many things alluded to
21 by Mr. Callaghan were not before you. They haven't come
22 out of Mr. Ouellette's mouth. The document isn't in front
23 of you. The entire basis of his argument -- he has
24 referred several times to the '78 or '79 allegation of the
25 chief. That's not Mr. Ouellette's evidence here.

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

2 **MR. LEE:** And you know, if Mr. Callaghan
3 wants to get into it that's fine, but I think we need to be
4 careful when we are making arguments about what the witness
5 has or has not said here.

6 **THE COMMISSIONER:** Thank you.

7 Anybody else? Thank you.

8 ---**SUBMISSIONS BY/REPRÉSENTATIONS PAR MR. WILLIAM CARROLL:**

9 **MR. CARROLL:** Mr. Manson probably said it
10 more eloquently than I, but from my perspective, sir, and
11 that of the members of the Ontario Provincial Police, some
12 of whom live in this community or in the region, I believe
13 there is a grasp of the reality that we're not here to
14 challenge or in any way question the allegations with
15 respect to the abuse. We are here to judge or totally
16 examine the institutional response to those allegations of
17 abuse.

18 It seems to me, though, that this community
19 there is a broader issue of wanting to clear up some facts,
20 not with respect to whether the abuse occurred or not but
21 in the analysis of how the institution's responded. So
22 that if -- and just as a hypothetical -- a witness says the
23 police did this, "I went and complained and the police did
24 this to me", presumably you're going to hear evidence from
25 the police denying that.

1 It seems to me first of all as a matter of
2 law that the witness has to be challenged on the point
3 before a witness could come and deny it, but over and above
4 that technical aspect of the law, it seems to me that if a
5 person or an organization's reputation is smeared by an
6 accusation which the organization maintains or the
7 individual believes is not true, then his counsel should be
8 permitted to explore the accusation insofar as the
9 institutional response is concerned, not the allegations of
10 abuse but anything that relates to how the institution
11 responded.

12 Those are my -- that's my position, sir.

13 **THE COMMISSIONER:** Thank you.

14 Mr. Callaghan, you will not be permitted to

15 ---

16 **MR. CALLAGHAN:** May I make a reply?

17 **THE COMMISSIONER:** Sure, go ahead.

18 ---**REPLY BY/RÉPLIQUE PAR MR. JOHN CHALLAGHAN:**

19 **MR. CALLAGHAN:** The concern I have is
20 twofold.

21 One is I am very concerned as to what is the
22 relevance to this Inquiry, the evidence that was adduced.
23 If the investigation that I am understanding Mr. Dumais
24 wants to talk about is the investigation by Constable
25 Snyder, I don't know what relevance it is to the mandate.

1 If it is the conduct underlying the
2 investigation then I think I have a right to challenge it
3 and I think that, as was said by Mr. Justice Corey,
4 credibility is always an issue and I am unable, without
5 going this way, to challenge this man's credibility.

6 I should add that these allegations -- I
7 mean they are all over the paper today, this is a small
8 community, and if I am unable to make these, go into this
9 issue, I will state categorically or uncategorically that I
10 will not be able to fully assist you at the end of the day.

11 **THE COMMISSIONER:** All right.

12 Now, first of all, let me say, Mr.
13 Callaghan, that I agree with Mr. Lee that the comments that
14 you make in submission are not correct, that they only
15 serve to inflame what the newspapers may carry and I am
16 going to ask you when I come back from lunch that we are
17 going to carry on this conversation.

18 I am officially telling you that I want you
19 to watch what you say in submissions, failing which we will
20 go into camera if we have to. But I am very concerned
21 about the way in which you are making your submissions.

22 **MR. CALLAGHAN:** I would ask some clarity of
23 exactly what we are talking about. I will go to the
24 transcript of what this man has said. He complained to the
25 chief of police.

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

2 **MR. CALLAGHAN:** He complained he was taken
3 out. He said that he would be shot if he continued his
4 complaints against Hickerson and Seguin. Different from
5 what I am about to get into, admittedly, but those are
6 grave allegations and I have not -- with the greatest
7 respect, I would like someone to take a transcript and
8 explain to me exactly where I have misstated it.

9 **THE COMMISSIONER:** Well, first of all, you
10 have misstated, in my view, that you have told -- that the
11 allegation -- the evidence that I have heard here is not
12 that the chief of police ordered two guys to go out and
13 rough him up, and that's what you have said. And I don't
14 hear that in the evidence, and I think as an officer of the
15 court you have to be very careful because the newspapers
16 are going to pick all of this up.

17 **MR. CALLAGHAN:** And if that was the
18 conclusion, I would have thought that was a reasonable
19 conclusion from what he is saying.

20 **THE COMMISSIONER:** No, no, no.

21 **MR. CALLAGHAN:** Well ---

22 **THE COMMISSIONER:** You are going to -- take
23 the lunch break.

24 **MR. CALLAGHAN:** Thank you.

25 **THE REGISTRAR:** Order; all rise. À l'ordre;

1 veuillez vous lever.

2 The hearing will resume at two p.m.

3 --- Upon recessing at 12:48 p.m. /

4 L'audience est suspendue à 12h48

5 --- Upon resuming at 2:32 p.m. /

6 L'audience est reprise à 14h32

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

9 The hearing is now resumed. Please be
10 seated. Veuillez vous asseoir.

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

12 **THE COMMISSIONER:** Did you have any further
13 comments, sir, before I make my comments?

14 **MR. CALLAGHAN:** No, sir. Thank you very
15 much.

16 **THE COMMISSIONER:** Thank you. You may sit
17 down.

18 **MR. CALLAGHAN:** Thank you.

19 ---**RULING BY THE COMMISSIONER/DÉCISION PAR LE COMMISSAIRE:**

20 **THE COMMISSIONER:** First of all, let me
21 begin by apologizing to the public that we came back at
22 2:30 p.m. While the normal lunch break is at 12:30 it
23 seemed that during our last discussions that time just flew
24 by and, accordingly, I thought it was only fair that we
25 resume at 2:30 p.m.

1 Before we broke, we had exchanges with
2 respect to what scope the cross-examination would take
3 place and we had prior discussions involving Mr. Manson and
4 Mr. Callaghan with respect to the scope dealing with the
5 allegations or complaints made to certain people in the
6 Cornwall Police.

7 As I have indicated often enough, all of
8 these matters are dealt with on a case-by-case basis, and I
9 wish to address this issue as on a continuing evaluation of
10 where we are going.

11 It is clear that parties have a right to
12 cross-examine witnesses on matters or issues relevant to
13 the mandate.

14 I have also indicated in the past that I am
15 not concerned about the truth of an allegation but the fact
16 that a complaint was made. In this case, however, we have
17 to characterize Mr. Ouellette's evidence on this issue
18 properly and once and for all.

19 And so there are two issues that I have to
20 deal with. The first one is his evidence that he
21 complained to different people he believed were police
22 chiefs are to be treated as complaints. Accordingly, if
23 there is a dispute as to whether or not those complaints
24 were ever made, cross-examination on that issue is
25 permissible.

1 As regards to the alleged threat by two or
2 more unidentified police officers, the fact that the
3 allegation is against two or more police officers and --
4 and I stress "and" -- the allegation is with respect to
5 sexual abuse directly related to the mandate make it
6 relevant for the purposes of cross-examination.

7 In that regard, I have reviewed the
8 transcript and it clearly states that the threat was with
9 respect to this witness speaking of alleged abuse at the
10 hands of Seguin, Hickerson and others. For those reasons,
11 I believe that some latitude should be given with respect
12 to cross-examination on those issues.

13 As well, in the past, I have spoken about
14 limited cross-examination, and I want to re-instruct myself
15 and others with respect to what I think is the applicable
16 principles. Referring back to my comments I made sometime
17 ago, limits of cross-examination in public inquiry's has
18 been repeatedly discussed in several court decisions.
19 These judgments have emphasized that cross-examination in
20 an inquiry is subject to the discretion of the Commissioner
21 as to relevancy, the avoidance of repetition and similar
22 matters.

23 Moreover, courts have said that holding that
24 a party has standing does not mean that each time the party
25 wishes to ask a question in cross-examination that they

1 have a right to do so indiscriminately.

2 The Commissioner remains in charge of the
3 inquiry. He is in control of the process. Thus, he is
4 obliged to rule on the relevance of the interests of the
5 party or questions that may be asked are those that would
6 assist the Commissioner in his work. Questions that are
7 irrelevant or are merely part of a fishing expedition might
8 not be permitted.

9 In other words, each of these matters must
10 be dealt with by the Commissioner on a situational basis as
11 they arise in the course of his continuing inquiry.

12 Accordingly, where we left off was whether
13 or not I would permit cross-examination on the motor
14 vehicle accident, and I am of the view that that does not
15 fall within the realm of relevance per se to this Inquiry
16 and would not assist me in deciding the credibility of this
17 person.

18 Accordingly, Mr. Callaghan, I will call the
19 witness up, and we can continue the cross-examination.

20 Thank you.

21 Let's have the witness please.

22 **MR. CALLAGHAN:** Thank you, sir.

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

24 **THE COMMISSIONER:** Mr. Ouellette, good

1 afternoon.

2 **MR. OUELLETTE:** Good afternoon.

3 **THE COMMISSIONER:** I am sorry that we kept
4 you. One of the reasons is after you left, we continued
5 until one o'clock and so I thought it only fair to extend
6 the lunch hour until 2:30 p.m., hence part of the reason
7 for the delay.

8 I have also given some directions with
9 respect to the cross-examination, for the scope of the
10 cross-examination, and so Mr. Callaghan will be permitted
11 to ask you some further questions.

12 But what I am going to ask you to do is to
13 try to remain as focused as you can in answering his
14 questions. It will help me immensely and don't feel
15 offended if I ask you to focus because sometimes we go too
16 far astray and that leads us to other areas where we really
17 shouldn't go.

18 **MR. OUELLETTE:** I apologize for ---

19 **THE COMMISSIONER:** Oh, well, then let me
20 tell you one thing.

21 You have absolutely no need to apologize.
22 All right? These are difficult situations to be in and I
23 well understand your situation. So, again, if I ask you to
24 refocus, don't take that as anything negative. All right?

25 **MR. OUELLETTE:** And the same goes for me.

1 Don't take it as an intent to distract or misinform.

2 **THE COMMISSIONER:** Absolutely not.

3 Absolutely not.

4 Mr. Callaghan?

5 --- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR MR.

6 **CALLAGHAN (Cont'd/Suite):**

7 **MR. CALLAGHAN:** Yes, thank you, Mr.
8 Commissioner.

9 I think where we left off, Mr. Ouellette,
10 was we were talking about your handwritten notes that you
11 had given for the OPP?

12 **MR. OUELLETTE:** Yes.

13 **MR. CALLAGHAN:** You have those there? Those
14 are Exhibit ---

15 **THE COMMISSIONER:** Exhibit 596.

16 **MR. OUELLETTE:** The handwritten notes?

17 **MR. CALLAGHAN:** Five ninety six (596); thank
18 you.

19 **THE COMMISSIONER:** That's the thick
20 document, yes, and you referred us to what page?

21 **MR. CALLAGHAN:** So we are on page -- why
22 don't we work with the 0122 numbers. They seem to be
23 easier.

24 **THE COMMISSIONER:** Yes.

25 **MR. CALLAGHAN:** That's 0122.

1 THE COMMISSIONER: Yes.

2 MR. OUELLETTE: That's 0922?

3 THE COMMISSIONER: No, 0122.

4 MR. CALLAGHAN: Sir, they are you
5 handwritten notes.

6 MR. OUELLETTE: Got it.

7 MR. CALLAGHAN: And just so I'm clear, did
8 you say that -- were these notes given to the OPP for
9 things you thought needed to be investigated?

10 MR. OUELLETTE: Absolutely.

11 MR. CALLAGHAN: And the idea was the OPP
12 would then either investigate them or arrange to have them
13 investigated?

14 MR. OUELLETTE: Yes, that was my hope.

15 MR. CALLAGHAN: And in it, as we said, you
16 made the two investigations -- and I am not going to get in
17 the motor vehicle investigation, but just to describe --
18 you made the two investigation requests at that time of the
19 incidents involving the chief of police and the two
20 officers and then the issue regarding Shawn Martel.

21 Those were issues you wanted the OPP to
22 investigate?

23 MR. OUELLETTE: Yes, I found them to be an
24 injustice and I wanted them rectified.

25 MR. CALLAGHAN: Right. And I just want to

1 start at the front of the document at the first page, and I
2 am just going to read this little bit at the bottom here.

3 It says:

4 "Seven years from (February '92) this
5 year, the day of my car accident when
6 my memories became nightmares,
7 Children's Aid Society abused me, the
8 hospitals abused or assaulted me
9 physically, I filed a complaint left
10 unresolved. I saw the chief of police
11 in private on one occasion to discuss
12 charges on record. Police buried the
13 cases with past (real) records of
14 possessions i.e. drugs to silence me
15 because the chief of police was
16 protecting someone very close indeed, a
17 close relative along with Dick, Nelson
18 and others. Shawn Martel must know of
19 them."

20 Do you see that?

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

22 **MR. CALLAGHAN:** All right.

23 The allegations regarding the chief of police, is that the
24 same allegation we are talking about that you testified to
25 or is this something different?

1 **MR. OUELLETTE:** It's related to it.

2 **MR. CALLAGHAN:** Well, is it the same
3 evidence you gave or is it different evidence? Is it the
4 story you told ---

5 **MR. OUELLETTE:** It's the same and additional
6 evidence. It's evidence that came to light when I realized
7 that these were unethical conduct by that Shawn Martel. I
8 just added his name to the list of already known
9 perpetrators.

10 **MR. CALLAGHAN:** I am focused -- and that is
11 for the HTA, but I am focusing on the chief of police. Is
12 that the same occasion that you talked about?

13 **THE COMMISSIONER:** Yesterday ---

14 **MR. OUELLETTE:** I am not certain.

15 **THE COMMISSIONER:** Pardon me?

16 **MR. CALLAGHAN:** You are not certain. Okay.

17 **THE COMMISSIONER:** Okay.

18 **MR. CALLAGHAN:** And here you say:

19 "The police buried the cases with real
20 records..."

21 What do you mean by that?

22 **MR. OUELLETTE:** The same way you are trying
23 to discredit me.

24 **THE COMMISSIONER:** No, no. I don't --
25 that's not helpful for me.

1 **MR. OUELLETTE:** It is the practice of the
2 Cornwall Police Department to ignore the truth and to
3 fabricate evidence and/or give false evidence or mislead in
4 order to discredit a witness that has no other way of
5 defending himself ---

6 **THE COMMISSIONER:** Okay. No, no ---

7 **MR. OUELLETTE:** --- because he is in jail at
8 the time.

9 **THE COMMISSIONER:** Sir, sir. No.
10 He is saying how did they do that? And in
11 there you say ---

12 **MR. OUELLETTE:** By intimidations.

13 **THE COMMISSIONER:** No, no. No, just a
14 minute, just a minute:

15 "... with past (real) records of
16 possession i.e. drugs to silence me..."

17 **MR. OUELLETTE:** Well, they would bring up my
18 past records.

19 **THE COMMISSIONER:** Right.

20 **MR. OUELLETTE:** And they would say something
21 to the effect -- and I can't quote them directly, but they
22 would say something to the effect of, why should we believe
23 you?

24 **THE COMMISSIONER:** M'hm, okay.

25 **MR. OUELLETTE:** Due to this? You denied

1 this. We found you guilty for that. Obviously, you are
2 guilty for that. So why should we believe you about this?

3 **THE COMMISSIONER:** Okay. So your past
4 criminal record is what they bring up?

5 **MR. OUELLETTE:** Right.

6 **THE COMMISSIONER:** Okay.

7 **MR. CALLAGHAN:** And -- sorry, I misread
8 that:

9 "The chief of police, in private, on
10 one occasion, discussed charges."

11 And what cases are being buried?

12 **MR. OUELLETTE:** The ones that were mentioned
13 prior to the recess.

14 **MR. CALLAGHAN:** And those are the ones you
15 mentioned yesterday, mentioning to the chief of police. Is
16 that what you're talking about?

17 **MR. OUELLETTE:** Some of them, yes.

18 **MR. CALLAGHAN:** Well, were there other
19 disclosures you're saying to the Cornwall Police other than
20 what you told us yesterday?

21 **MR. OUELLETTE:** Well, other than Ken Seguin,
22 Richard Hickerson, Chris Wilson and Mr. Lalonde and a few
23 other -- like Gerry Lalonde and Lionel Carrière ---

24 **MR. CALLAGHAN:** But those were -- those
25 haven't been disclosed yet, sir. You were dealing with the

1 OPP at this stage. I'm trying to figure out -- I was
2 concentrating on the Cornwall Police. I'm concentrating on
3 your statement and I'm just concentrating at this time,
4 what was buried. You've told us about your conversation --
5 -

6 MR. OUELLETTE: My complaint was buried.

7 MR. CALLAGHAN: And that was the
8 conversation you relayed yesterday to one of the two
9 chiefs?

10 MR. OUELLETTE: It was noted. It was set
11 aside and it was forgotten.

12 MR. CALLAGHAN: I understand that. I'm just
13 being clear. It's the discussion you had yesterday with
14 Mr. Dumais; correct, or is there more?

15 MR. OUELLETTE: Well, again, I don't know
16 Mr. Dumais.

17 MR. CALLAGHAN: That's Mr. Dumais.

18 MR. OUELLETTE: Oh, excuse me. Basically,
19 yes. I would say basically yes.

20 MR. CALLAGHAN: So that's what you mean?

21 MR. OUELLETTE: Basically.

22 MR. CALLAGHAN: Basically or that's what you
23 mean?

24 MR. OUELLETTE: Well, the dates could be
25 different because, as I said, dates, because of the

1 conditioning, it's hard to remember one day from the other.

2 MR. CALLAGHAN: Well, we'll get to dates.

3 MR. OUELLETTE: But I know I had three
4 visits with two different chiefs of police.

5 MR. CALLAGHAN: Three visits, not two?

6 MR. OUELLETTE: Three visits. Well, I
7 attempted to have a third, but it was refused.

8 MR. CALLAGHAN: I see. Okay.

9 Well, this says "a visit" but we'll get to
10 that. And then it says:

11 "...along with Ken, Dick, Nelson and
12 others."

13 So who is -- Ken is Ken Seguin, right?

14 MR. OUELLETTE: Ken Seguin.

15 MR. CALLAGHAN: Dick is Dick Hickerson?

16 MR. OUELLETTE: Right.

17 MR. CALLAGHAN: Who's Nelson?

18 MR. OUELLETTE: Nelson Barque.

19 MR. CALLAGHAN: All right.

20 So this is to suggest that they are covering
21 up Ken, Dick and Nelson Barque? Is that what that's to
22 imply?

23 MR. OUELLETTE: That's exactly what it
24 implies.

25 MR. CALLAGHAN: So you told us -- I thought

1 when Mr. Rose over here was talking that you hadn't really
2 had any complaints about Nelson Barque. Where do you get
3 that from?

4 **MR. OUELLETTE:** Nelson Barque, the reason
5 why I complained about it is because he knew that he
6 brought me to Richard Hickerson. He knew, because he
7 worked with Ken Seguin, that Ken Seguin -- he had to know.

8 You can hear a pin drop from one office to
9 the other in a probation office. If someone screamed or
10 yelled or had any objection, I'm sure the secretaries or
11 somebody else that worked there or was under the employ
12 there heard what was going on in those offices. The fact
13 that no one even bothered to knock on the door and find out
14 what the hell was happening behind closed doors proves that
15 they were complicit ----

16 **MR. CALLAGHAN:** All right.

17 **MR. OUELLETTE:** --- and had knowledge of
18 what was happening.

19 **MR. CALLAGHAN:** So you have nothing specific
20 other than your ---

21 **MR. OUELLETTE:** It was a suspicion.

22 **MR. CALLAGHAN:** --- suspicion?

23 So had you talked to anybody about Nelson
24 Barque?

25 **MR. OUELLETTE:** No, because I didn't really

1 know Nelson Barque.

2 MR. CALLAGHAN: Well, how did you get his
3 name?

4 MR. OUELLETTE: From Ken Seguin.

5 MR. CALLAGHAN: So you just put Nelson
6 Barque in there. You hadn't talked to, say, Perry Dunlop
7 about Nelson Barque?

8 MR. OUELLETTE: No, I had no idea. I didn't
9 want to talk to Perry Dunlop. He was a member of the
10 police department. I didn't trust him.

11 MR. CALLAGHAN: All right.

12 And did you share any of this information
13 with him?

14 MR. OUELLETTE: Only in the basement before
15 he -- when we were comparing notes basically. I don't
16 believe I had any conversation prior to that with Mr.
17 Dunlop concerning those people.

18 MR. CALLAGHAN: And you then -- if I could
19 then take you over to 134?

20 Now, this is your complaint that gave rise
21 to -- and I'm afraid I've misstated it, but it's Sergeant
22 Snyder's -- Staff Sergeant Snyder's investigation; correct?

23 MR. OUELLETTE: I did have an interview with
24 Sergeant Snyder, yes.

25 MR. CALLAGHAN: Well, you had more than

1 that. You had four interviews, didn't you?

2 MR. OUELLETTE: I don't recall how many, but
3 I know I talked to him.

4 MR. CALLAGHAN: All right.

5 And do you recall this being your statement
6 to him?

7 MR. OUELLETTE: I don't recall this
8 particular statement being the statement to him. I believe
9 this statement originally originated when I attempted to
10 file for criminal compensation.

11 MR. CALLAGHAN: Well ---

12 MR. OUELLETTE: This is my handwritten draft
13 of what I typed out for criminal compensation.

14 MR. CALLAGHAN: Well, this was given to the
15 OPP?

16 MR. OUELLETTE: I realize that.

17 MR. CALLAGHAN: All right.

18 And then this was what was forwarded to the
19 Cornwall Police as your complaint?

20 MR. OUELLETTE: Probably.

21 MR. CALLAGHAN: All right.

22 And do you recall meeting with Staff
23 Sergeant -- you know Staff Sergeant Snyder from growing up?

24 MR. OUELLETTE: Yes, I do. I know his
25 brother. I grew up with him in school.

1 **MR. CALLAGHAN:** And when you met with Staff
2 Sergeant Snyder, do you recall him asking for a statement
3 and you saying, "No, use this statement"? Do you recall
4 any of that? This has been a long time.

5 **MR. OUELLETTE:** I believe I wanted to assist
6 him in any way possible that would make and facilitate his
7 job. Being that I knew his brother and being that he came
8 from the same neighbourhood, I trusted him a little more
9 than the usual police officer, and I really believed that
10 he had my best interests at heart.

11 **MR. CALLAGHAN:** All right.

12 **MR. OUELLETTE:** But now I know better.

13 **MR. CALLAGHAN:** Okay. But you didn't have
14 any of that feeling during the time you dealt with him?
15 It's only now; correct?

16 **MR. OUELLETTE:** Well, after the fact, yes.

17 **MR. CALLAGHAN:** It's only after the fact.
18 Okay.

19 Just so I want to be absolutely clear, do
20 you recall him asking you to prepare a statement and you
21 saying, "No, this is the statement"? Do you recall any
22 discussion about that, that you wanted to use this
23 statement as your complaint?

24 **MR. OUELLETTE:** I believe I wanted to assist
25 him and make his job easier. I think I offered this as

1 testimony.

2 **MR. CALLAGHAN:** As testimony.

3 And you say you then wanted to make a
4 criminal compensation with this? Is that what you said?

5 **MR. OUELLETTE:** Well, I was in the process
6 of doing that when I gave him -- when I contacted one
7 agency, I would send them a copy of everything I sent to
8 every other agency.

9 **MR. CALLAGHAN:** But ---

10 **MR. OUELLETTE:** So that everybody was aware
11 of everybody else's letters and that there wouldn't be any
12 confusion in dealing with me.

13 **MR. CALLAGHAN:** Right.

14 And just so I'm clear though, you wanted --
15 you were seeking criminal compensation for the conduct in
16 this complaint; correct? There's no ---

17 **MR. OUELLETTE:** I had to negotiate it.

18 **MR. CALLAGHAN:** All right. But you were
19 seeking it?

20 **MR. OUELLETTE:** I was seeking it, yes.

21 **MR. CALLAGHAN:** And at the time, I take it
22 you needed money because you were on a disability pension
23 and your insurance ---

24 **MR. OUELLETTE:** Money had nothing to do with
25 it.

1 **MR. CALLAGHAN:** All right.

2 You never suggested to Staff Sergeant Snyder
3 that if he makes a complaint -- if he supports a criminal
4 compensation complaint, then nothing has to happen?

5 **MR. OUELLETTE:** I don't understand that
6 question.

7 **MR. CALLAGHAN:** Well, I was just saying, did
8 you recall ever suggesting to Staff Sergeant Snyder that if
9 we just get the criminal compensation part done, then it's
10 not that important what happens in this investigation,
11 something to that effect? If you don't remember or it
12 didn't happen ---

13 **MR. OUELLETTE:** I think at the time I was
14 pretty upset when I was -- you know, under the
15 circumstances, because I was trying to recall, and when you
16 recall, your memory kicks in and trauma kicks in, and then
17 you remember bad memories. As I said before, I don't like
18 to remember bad things because they're bad.

19 So to answer ---

20 **MR. CALLAGHAN:** But that's not ---

21 **MR. OUELLETTE:** --- that, I was completely
22 aware of what I was saying at the time or doing at the
23 time. My nervous condition and disposition prevents me
24 from recalling it properly at this present time.

25 **MR. CALLAGHAN:** And I don't want to go into

1 the Martel issue, but you're also seeking compensation for
2 that too -- criminal compensation?

3 **MR. OUELLETTE:** Yes.

4 **MR. CALLAGHAN:** And so let's just take a
5 look at this, and this is something you wrote on your own,
6 without influence?

7 **MR. OUELLETTE:** Yes, it was to the best of
8 my ability under the circumstances because I had a hell of
9 a lot of stuff happening to me at the time.

10 **MR. CALLAGHAN:** Well, maybe if -- I'm going
11 to ask you quite detailed questions. Perhaps you could
12 tell me what you had happening?

13 **MR. OUELLETTE:** Well, the CAS removed my
14 children for reporting a case of sexual molestation of my
15 daughter by the maternal grandfather; gave him access,
16 refused me access on numerous occasions. I haven't seen my
17 children like for five-and-a-half years in succession, give
18 or take a week-and-a-half of visitation in between, for
19 nothing more than suffering from post-traumatic stress
20 disorder.

21 **THE COMMISSIONER:** So you had ---

22 **MR. OUELLETTE:** So in order to protect my
23 children from sexual abuse and warn them about sexual abuse
24 I was barred from Cornwall, prevented from telling my
25 children or asking my children or counselling my children,

1 even being that I'm a victim of the same crime, to assist
2 them in dealing with their own sexual harassments and
3 assaults which is like parental alienation and it hurt my
4 children academically and psychologically and emotionally,
5 and it hurt me the same way and I think it was more of an
6 obstruction than an assistance to my children.

7 **MR. CALLAGHAN:** But just so I am clear, when
8 you write this statement and it's written sometime I
9 believe -- yes, approximately September '99. You give it
10 to the OPP October 28th '99?

11 **MR. OUELLETTE:** Dates are ---

12 **MR. CALLAGHAN:** Not -- what about -- but up
13 and to this point, I mean, I hear your story about your
14 family. I take it you have also discussed how frustrated
15 you were with the police because they were coming. You
16 were ---

17 **MR. OUELLETTE:** I was also in great pain
18 from the car accident. I had sciatica vertical vertebrae,
19 cervical vertebrae and a lumbar and a sacral and sciatica
20 problems. I was in great pain and distress.

21 **MR. CALLAGHAN:** And that's one reason, I
22 take it, you weren't happy with the police?

23 **MR. OUELLETTE:** Well ---

24 **MR. CALLAGHAN:** Because they never did a
25 proper investigation, adding to some of your problems;

1 correct?

2 **MR. OUELLETTE:** Exactly.

3 **MR. CALLAGHAN:** Exactly. And I take it,
4 during this period, you had indicated that they were
5 harassing you and that has to do with interaction with your
6 family, Children's Aid Society ---

7 **MR. OUELLETTE:** Stopping me on the street
8 for a dirty license plate after they had just witnessed
9 someone turning illegally on a left -- on a red light
10 illegally, passing four cars, asking me ---

11 **MR. CALLAGHAN:** But I'm not ---

12 **MR. OUELLETTE:** --- passing me, ignoring
13 that guy passing me and then stalking me for a dirty
14 license plate and harassing me and threatening me with
15 arrest for a dirty license plate.

16 **MR. CALLAGHAN:** But what I'm trying to get
17 at, sir, I'm trying to get your state of mind.

18 You are writing this. Is it fair to say you
19 are upset with the police? You are upset with the police
20 for not investigating the car accident? You are upset ---

21 **MR. OUELLETTE:** No, I am not upset with the
22 police. I am upset with corrupt police, sir.

23 **MR. CALLAGHAN:** And that's how you see the
24 Cornwall Police as corrupt police?

25 **MR. OUELLETTE:** I know they are.

1 **MR. CALLAGHAN:** Oh, so you must have been
2 upset with them, right?

3 **MR. OUELLETTE:** Wouldn't you be?

4 **MR. CALLAGHAN:** It doesn't matter what I am.
5 I am just asking you if you are upset. You can say "yes",
6 you can say "no, you can say "I was" ---

7 **MR. OUELLETTE:** I was offended. I was hurt.
8 I was angry. Upset is not the word I would use.

9 **MR. CALLAGHAN:** And that's the state of mind
10 you are when you're writing all this material in '99
11 sometime?

12 **MR. OUELLETTE:** No, this is a cry for help.

13 **MR. CALLAGHAN:** Okay, a cry for help.

14 In this document then, this is the first
15 time you write this story out. Is that my understanding?

16 **MR. OUELLETTE:** I believe it was the first
17 time I actually tried to sit down and chronologically and
18 logically put it down as it happened. There may be some
19 discrepancies and some mistakes in the dates, but under the
20 circumstances of when and at the time period of when I
21 wrote it, I think I did fairly well.

22 **MR. CALLAGHAN:** Well, let's just talk about
23 that then. The question I want to ask is, I think you
24 mentioned one other person you might have told this story
25 to prior to writing this down, and that would have been?

1 MR. OUELLETTE: Francine Gobeil.

2 MR. CALLAGHAN: And she was who?

3 MR. OUELLETTE: She was -- she is a very
4 good friend of mine. She is sitting over there, and ---

5 MR. CALLAGHAN: And when did you tell her?

6 MR. OUELLETTE: Oh, 1984 or '85-ish.

7 MR. CALLAGHAN: Okay. And she was ---

8 MR. OUELLETTE: Don't quote me on that. It
9 could be '83.

10 MR. CALLAGHAN: Could it be '79?

11 MR. OUELLETTE: She is the one who suggested
12 that I approach the chief of police in the first place.

13 MR. CALLAGHAN: And that is she is your
14 former ---

15 MR. OUELLETTE: Friend.

16 MR. CALLAGHAN: Oh, I thought you were
17 husband and wife?

18 MR. OUELLETTE: We were in a common-law
19 relationship at one time.

20 MR. CALLAGHAN: Okay. Let's just say, so
21 you write this down and you say:

22 "July to September '78 offender Police
23 Chief Shaver."

24 You see that?

25 MR. OUELLETTE: Yes.

1 **MR. CALLAGHAN:** All right.

2 And that's what you remembered when you
3 wrote this down?

4 **MR. OUELLETTE:** I remembered Shaver because
5 that was the last chief of police that I saw. I saw two
6 different chiefs of police.

7 **MR. CALLAGHAN:** Well, how did you know -- I
8 thought you had said that you wouldn't know who they were.
9 You said you were a street urchin and you wouldn't have
10 known who they were?

11 **MR. OUELLETTE:** The first chief of police I
12 have no idea what his name was until I was informed of that
13 recently. The second chief of police I did know who he was
14 by name because he was in the newspapers.

15 **MR. CALLAGHAN:** All right. So you learned
16 of him, of Chief Shaver, in the newspapers?

17 **MR. OUELLETTE:** But I didn't see his
18 photograph in the newspapers. The first time I have ever
19 seen his photograph other than seeing him in person is when
20 my attorney showed him -- showed me a photocopy of his
21 photograph and I identified him.

22 **MR. CALLAGHAN:** And when was that?

23 **MR. OUELLETTE:** About a week-and-a-half to
24 two weeks ago.

25 **MR. CALLAGHAN:** So this is what you write,

1 and you say:

2 "I went to see the chief of police
3 twice, each time by appointment."

4 Now, I know that you don't say two different
5 chiefs. You say the chief of police?

6 **MR. OUELLETTE:** Well, they were chiefs of
7 police. What else am I supposed to call them?

8 **MR. CALLAGHAN:** I see.

9 "And the third attempt was refused."

10 And then you say you discussed your problems
11 with a number of people but then you have:

12 "Danny boy, Judge Fitzpatrick..."

13 That's -- you are upset because he put you
14 on probation?

15 **MR. OUELLETTE:** Who put me on probation?

16 **MR. CALLAGHAN:** Well, you have "Danny boy,
17 Judge Fitzpatrick".

18 **MR. OUELLETTE:** Danny boy is one of the
19 victims that Malcolm MacDonald, Judge Fitzpatrick and Guy
20 Jodoin had something to do with and who told me so.

21 **MR. CALLAGHAN:** Who told you that?

22 **MR. OUELLETTE:** Danny himself.

23 **MR. CALLAGHAN:** I see. And when did he tell
24 you that?

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

1 MR. CALLAGHAN: When did he tell you that?

2 MR. OUELLETTE: In the '80s sometimes.

3 MR. CALLAGHAN: In the '80s.

4 And then you say this happens in '78
5 according to this note, but you're not sure what year it
6 was?

7 MR. OUELLETTE: No, I put July to September
8 '78 because when I got out -- when I got charged in 1970 --
9 late '78 -- and put me into '79 and then was convicted in
10 '82 or whatever it was for conspiracy to traffic in LSD ---

11 MR. CALLAGHAN: Right.

12 MR. OUELLETTE: When you're going to court,
13 sir, you're concentrating on court. You're not
14 concentrating on what day it is, what month it is, what
15 time of day it is. You are concentrating on your court
16 issues, okay?

17 MR. CALLAGHAN: Sure.

18 MR. OUELLETTE: You're not concentrating on
19 what month it is.

20 So the discrepancy in the months or the
21 years can be easily explained in this fashion. My mind
22 wasn't on the date. My mind was on the offence.

23 MR. CALLAGHAN: And what offence was that,
24 sir?

25 MR. OUELLETTE: The fact that I reported it

1 and nothing was done.

2 **MR. CALLAGHAN:** No, no, but what offence?
3 What offence are you talking about? What criminal offence
4 are you talking about?

5 **MR. OUELLETTE:** Sexual harassment, sexual
6 abuse.

7 **MR. CALLAGHAN:** Sorry, I thought you said
8 you were going to court and you were talking about an
9 offence. What offence are you talking about?

10 **THE COMMISSIONER:** What were you charged
11 with?

12 **MR. OUELLETTE:** Oh, I was charged with
13 conspiracy to traffic in LSD.

14 **MR. CALLAGHAN:** So you say it was before
15 that or after that?

16 **MR. OUELLETTE:** It was after that.

17 **MR. CALLAGHAN:** Okay. So you then go down -
18 - let's just look at what you write. You said:

19 "Later in 1983-ish I got in trouble
20 again for hash."

21 So you've got a five-year span in this note.
22 Do you see that? Is that the occasion you're talking
23 about?

24 **MR. OUELLETTE:** Well, this is it. I got
25 busted in '78 approximately.

1 MR. CALLAGHAN: All right.

2 MR. OUELLETTE: Late '78.

3 MR. CALLAGHAN: You got busted.

4 MR. OUELLETTE: And during that time I had a
5 whole bunch of problems happening to me.

6 And by '83 I had already gone to jail and I
7 was subjected to some very unusual things while I was
8 incarcerated, and I resented it and became bitter about it
9 and then I met Francine at a party. And then when I told -
10 - I broke down because I was very upset and I had no help.
11 I had exhausted all lawyers. No one would touch my case
12 with a 10-foot pole. No one would give me any legal
13 address or redress to solve the problem.

14 Therefore, it went against my rights to get
15 that and I'm sure the Attorney General will agree with me.
16 And every citizen has the right to be represented and all
17 of my representatives wouldn't advocate for me. Therefore,
18 I had to do it by myself.

19 When it falls -- this is my point -- there
20 is all kinds of people out there getting professionals --
21 so-called professionals with diplomas on their walls,
22 getting high pay to do their job, and it's left up to the
23 victim or the survivor to do their job for them. And when
24 they are being accused of something, their ability to
25 defend themselves is removed, but they don't spare. They

1 have all the resources to prosecute us, convict us,
2 sentence us. You have computers. You have CPIC. You have
3 all of what you need to make us look whatever you want to
4 make us look like, but you destroy your files so no one can
5 catch you at what you do.

6 MR. CALLAGHAN: Okay. Can I ---

7 MR. OUELLETTE: Does that answer your
8 question?

9 MR. CALLAGHAN: Actually, it doesn't. What
10 I'm trying to get at ---

11 MR. OUELLETTE: It should.

12 MR. CALLAGHAN: What I'm trying to get at,
13 sir, is what is -- you say you were incarcerated and you
14 had all these things happen to you, and is it after that
15 you speak to the chief of police?

16 MR. OUELLETTE: Yes.

17 MR. CALLAGHAN: All right.

18 MR. OUELLETTE: That's what prompted me to
19 do it.

20 MR. CALLAGHAN: But you give these ---

21 MR. OUELLETTE: I was tired of being hunted.

22 MR. CALLAGHAN: All right. So let's just
23 back up.

24 So was it -- you said you were incarcerated
25 for narcotics in the late seventies. Is that what you were

1 ---

2 **MR. OUELLETTE:** For a hallucinogenic --
3 conspiracy to traffic in hallucinogenic drugs, namely LSD
4 25.

5 **MR. CALLAGHAN:** So that's the late
6 seventies? So it's after that ---

7 **MR. OUELLETTE:** December 10th I was charged.

8 **MR. CALLAGHAN:** December 10th of what year?

9 **MR. OUELLETTE:** December 10th of 1978.

10 **MR. CALLAGHAN:** All right.

11 And then it was after that -- how long did
12 you serve?

13 **MR. OUELLETTE:** I'm not sure.

14 **MR. CALLAGHAN:** All right. Would it be a
15 little over a month?

16 **MR. OUELLETTE:** But I was sentenced -- oh, I
17 served quite a few months, but I was sentenced to, I think
18 it was 18 months and two years less a day, basically.

19 **MR. CALLAGHAN:** But how long did you do?

20 **MR. OUELLETTE:** I was paroled. I'm not sure
21 how long I did, but the time -- most of the time that I did
22 do was in a double cell.

23 **MR. CALLAGHAN:** No, no, I'm not -- we've
24 heard about that. I don't think the Commissioner wants to
25 talk about the double cell.

1 **MR. OUELLETTE:** Okay. Fine.

2 **MR. CALLAGHAN:** So all I'm trying to get at
3 -- but it's after that occasion that you come out and you
4 speak to the chief of police, within a couple of months
5 after your release? Is that what I'm hearing?

6 **MR. OUELLETTE:** Yes, that's very safe to
7 assume, yes.

8 **MR. CALLAGHAN:** So at some time between --
9 your release date -- you were sentenced to 18 months. Did
10 you do six months, do you think?

11 **MR. OUELLETTE:** Possibly.

12 **MR. CALLAGHAN:** Okay. So some time between
13 late '78. So that's -- it depends on -- this might be out
14 then by a couple of months, right, because it may not be
15 September, it might be January '79?

16 **MR. OUELLETTE:** I came out in spring.

17 **MR. CALLAGHAN:** Okay. So is that maybe why
18 you have July-September, because you might have come out in
19 the spring of '78?

20 **MR. OUELLETTE:** I came out in spring, I
21 think, just either prior to my birthday or just after it.

22 **MR. CALLAGHAN:** All right.
23 So when's your birthday?

24 **MR. OUELLETTE:** March 13th.

25 **MR. CALLAGHAN:** Okay. So that's why -- so

1 then that's why you have July-September '78, because then
2 you would have come out and you would have complained at
3 that time?

4 **MR. OUELLETTE:** No. July '78, I wasn't even
5 charged for that charge yet. It happened on December 10th,
6 1978. I complained in '83-'84.

7 **MR. CALLAGHAN:** Sorry, sir, when did you get
8 ---

9 **MR. OUELLETTE:** I was released in '83, April
10 approximately.

11 **MR. CALLAGHAN:** Okay. So this is a complete
12 -- this timeline you're saying now is completely wrong?

13 **MR. OUELLETTE:** Well, I was released in
14 April of '83 from OCI. I took a train. I was brought to
15 the train station and left there to take a train. It was
16 springtime and I remember that specifically.

17 **THE COMMISSIONER:** Mr. Ouellette ---

18 **MR. CALLAGHAN:** I appreciate that.

19 **THE COMMISSIONER:** But just stop for a
20 minute.

21 What he's getting at is you said that the
22 first complaint, I guess, occurred between July and
23 September of '78. "I went to see the chief of police."

24 So what he's saying is, well, if you were
25 charged on December 10th ---

1 **MR. OUELLETTE:** When I was -- I'm trying to
2 explain.

3 When I was trying to recall the events
4 chronologically and trying to attempt to write them down,
5 it's possible I made mistakes as to what dates -- the dates
6 on which those things happened, but they were roundabout
7 that time, and the reason why I put these little July
8 whatever things and dates is to help me focus
9 chronologically on the approximate time that these events
10 started to take place in order for me to be able to recall
11 the rest of what I wrote.

12 **MR. CALLAGHAN:** All right.

13 **THE COMMISSIONER:** Okay. Let me, please.

14 What I'm trying to figure out is based on
15 what you have and what we now know ---

16 **MR. OUELLETTE:** Right.

17 **THE COMMISSIONER:** --- right. What Mr.
18 Callaghan got out of you was that you complained to the
19 first chief of police that you went to after you got out of
20 jail.

21 **MR. OUELLETTE:** I got out of jail in 1974-5,
22 okay; went to Ottawa. When I came back, I complained to
23 the chief of police.

24 **MR. CALLAGHAN:** So these two complaints are
25 separate ---

1 **MR. OUELLETTE:** Not -- they're not related
2 in any way. I probably complained about something else
3 other than Ken Seguin on the first occasion, but that was
4 an occasion that wasn't related to what I'm talking about.

5 The other two occasions that I'm talking
6 about where I did complain about Ken Seguin, it was still
7 the same chief of police and then it was another chief of
8 police, and on the third occasion that I tried -- so it was
9 four in all, okay -- one early, one -- one in the
10 seventies, one in the eighties, another one in the
11 eighties, and the last one I attempted in the eighties
12 didn't take place because they didn't want to take my
13 appointment. That's what happened exactly.

14 **MR. CALLAGHAN:** Well, I mean, that's
15 different, is it not, than you told ---

16 **MR. OUELLETTE:** Well, it might be different,
17 but that's what happened.

18 **MR. CALLAGHAN:** Okay. Well, I'm just trying
19 to get what you told Staff Sergeant Snyder. Did you not
20 tell him that you complained to Chief Shaver in 1978 and
21 did he not write you and say ---

22 **MR. OUELLETTE:** Got the name wrong, got the
23 chief of police right.

24 **MR. CALLAGHAN:** Got the name wrong?

25 **MR. OUELLETTE:** I'm talking -- I don't care

1 what his name was. He was the chief of police. He was
2 introduced to me by the secretary as being the chief of
3 police. I assumed that's who he was.

4 **MR. CALLAGHAN:** But did you not tell him
5 that it was one chief of police and it was in about 1978
6 and that you believed it to be Shaver and that he confirmed
7 later that Shaver didn't start until '83? Isn't that what
8 happened and now you've changed to meet that story?

9 **MR. OUELLETTE:** No. At the time that I
10 wrote Police Chief Shaver, I believe I must have got the
11 information from somewhere else than the police department.
12 It's possible that that happened.

13 **MR. CALLAGHAN:** Well, who would you get --
14 -

15 **MR. OUELLETTE:** I don't know I found out
16 that his name was Shaver. I'm not going to pretend to tell
17 you that I do know. I have no idea how I know. All I do
18 know is that he worked in 1983-84.

19 This person, the second one, the second
20 chief of police, was working in 1983 and 1984, and I can
21 describe him to you to a tee.

22 **MR. CALLAGHAN:** That's the person you
23 described yesterday?

24 **MR. OUELLETTE:** That's the person that
25 Dallas Lee showed me a very bad photocopy of, that I ID'd

1 positively without knowing his name in advance.

2 **MR. CALLAGHAN:** Well, okay.

3 You're talking -- this is the description
4 you gave yesterday, glasses ---

5 **MR. OUELLETTE:** No, that's the first one.

6 **MR. CALLAGHAN:** That's the first one. Okay.
7 So Mr. Lee has now shown you a photograph. So you're just
8 going to go -- so you're shown a photograph of Mr. Shaver.
9 So I guess there's no point asking you what Mr. Shaver
10 looks like because you saw a photograph yesterday?

11 **MR. OUELLETTE:** I didn't see it yesterday, I
12 saw it two weeks ago.

13 **MR. CALLAGHAN:** I see. So you saw a photo
14 two weeks ago.

15 **MR. OUELLETTE:** Approximately.

16 **MR. CALLAGHAN:** All right.

17 So now obviously you can describe him
18 because you've seen his photograph?

19 **MR. OUELLETTE:** I described him prior to
20 seeing the photograph.

21 **MR. CALLAGHAN:** Well, isn't it the case that
22 when you got the report, that you found out that in fact
23 Shaver wasn't there in '78?

24 **MR. OUELLETTE:** It was brought to my
25 attention that Shaver wasn't employed until the eighties,

1 but it was also stated as a fact that I have seen more than
2 one chief of police. So I don't see why you're making a
3 big deal about it.

4 **MR. CALLAGHAN:** I'm just trying to get --
5 I'm just trying to get the story straight.

6 When you say you didn't know where Shaver's
7 name came from in '99 ---

8 **MR. OUELLETTE:** It's possible it came from
9 Perry Dunlop and Dick Nadeau.

10 **MR. CALLAGHAN:** It is, isn't it?

11 **MR. OUELLETTE:** That is a possibility.

12 **MR. CALLAGHAN:** Okay. Did you talk about
13 Shaver with those guys?

14 **MR. OUELLETTE:** When they were moving.

15 **MR. CALLAGHAN:** All right.

16 **MR. OUELLETTE:** Shaver's name came up. I
17 used to work for Malcolm MacDonald and I used to take care
18 of his aunt.

19 I know it seems unrelated, but there were a
20 lot of names that -- I didn't really know the names of the
21 people that I was working with or for because I don't
22 really pay attention to names that much.

23 I'm not sure how I acquired Chief Shaver's
24 name or how I got to find out that that's who it was that I
25 was seeing at the time. It's possible it came from me.

1 It's possible I heard it elsewhere.

2 MR. CALLAGHAN: But is it ---

3 MR. OUELLETTE: I'm not contesting that.

4 What I'm just saying is that I visited two different chiefs
5 of police.

6 MR. CALLAGHAN: I understand that. I
7 understand what you're saying.

8 The name Shaver was discussed then, you
9 think, with Mr. Dunlop and Mr. Nadeau?

10 MR. OUELLETTE: It's possible, I said.

11 MR. CALLAGHAN: Well, did you relay this
12 story to Mr. Dunlop and Mr. Nadeau?

13 MR. OUELLETTE: That I visited the chief of
14 police?

15 MR. CALLAGHAN: Yes.

16 MR. OUELLETTE: Yes, I did.

17 MR. CALLAGHAN: Oh, you did? And when did
18 you do that?

19 MR. OUELLETTE: When I first approached them
20 about the rest of what we've been talking about today.

21 MR. CALLAGHAN: So ---

22 MR. OUELLETTE: Like when I -- the Impact
23 Statement stuff.

24 MR. CALLAGHAN: The Impact Statement doesn't
25 have any of this in it. It doesn't have any detail on

1 this.

2 MR. OUELLETTE: I know, but just, you know,
3 people speak without having to write it down, sir.

4 MR. CALLAGHAN: I see. So you were meeting
5 with Mr. Dunlop before this, relaying your story to Mr.
6 Dunlop. Did he show you any pictures?

7 MR. OUELLETTE: No.

8 MR. CALLAGHAN: No.

9 And you were talking about Shaver and who
10 else? Any other police officer you were talking to with --
11 -

12 MR. OUELLETTE: Not that I -- not that I am
13 aware of.

14 MR. CALLAGHAN: Let me just go on then.

15 So in this rendition, you have later in
16 '83ish, so I take it that is later than '78. Is that what
17 you mean by reading this now? Is that what you mean?

18 MR. OUELLETTE: Well, I'm saying in the
19 thereabouts area, like in a five to ten-year period, right,
20 because it's convoluted. When you have very many abuses
21 happening to you, it's hard to keep track of which abuse
22 happened when ---

23 MR. CALLAGHAN: So you talked to ---

24 MR. OUELLETTE: --- especially when they all
25 happened at once.

1 **MR. CALLAGHAN:** So you think your discussion
2 was five to ten years with the chief before this event
3 happens that's related to ---

4 **MR. OUELLETTE:** Well, I'm sure it was in a
5 10-year period. It was in quick succession. They were
6 within five years apart from each other.

7 **MR. CALLAGHAN:** Oh, five years apart. Okay.
8 And again, you say:

9 "I got in trouble again for hash 7
10 grams. Arrested and charged by Jay
11 Project, OPP Cornwall Police Joint
12 Operation, Negroid OPP, male 28-30,
13 short, three girls OPP."

14 **MR. OUELLETTE:** Yes.

15 **MR. CALLAGHAN:** Okay. That is reference to
16 Jay Hope, right?

17 **MR. OUELLETTE:** Yes.

18 **MR. CALLAGHAN:** And Jay Hope was running an
19 undercover operation in the City of Cornwall; correct?

20 **MR. OUELLETTE:** Yes.

21 **MR. CALLAGHAN:** And you offered to buy or
22 sell? I know you clarified this yesterday.

23 **MR. OUELLETTE:** He entrapped me and enticed
24 me into purchasing him either weaponry and/or hashish,
25 which I complied with because I'm a nice guy.

1 **MR. CALLAGHAN:** Sorry, sorry.

2 **MR. OUELLETTE:** Not for the weaponry but for
3 the hashish at least. And ---

4 **MR. CALLAGHAN:** So not for the weaponry, but
5 you basically bought drugs and talked to a guy that was
6 going to sell you firearms to be nice? I just want to make
7 sure I understand that.

8 **MR. OUELLETTE:** No. At the time, I had
9 already spoken to the chief of police ---

10 **MR. CALLAGHAN:** I know. I'm not ---

11 **MR. OUELLETTE:** --- about something relating
12 to Ken Seguin and Richard Hickerson. He did nothing about
13 it.

14 **MR. CALLAGHAN:** I am not talking about that.

15 **MR. OUELLETTE:** It had been the second time
16 already.

17 **MR. CALLAGHAN:** All right. I understand
18 your ---

19 **MR. OUELLETTE:** I spoke to this undercover
20 officer. I asked him if he was an undercover officer. He
21 is obliged by law to answer correctly. He denied he was an
22 undercover officer. That's entrapment right off the bat.
23 He then enlisted me into a conversation along with the
24 other people who pretended to be prostitutes, and he was a
25 pimp at a restaurant. I sat down and had coffee with him

1 and that's when the conversation turned to drugs, and he
2 asked me to get drugs for him, and I complied and I got the
3 drugs for him. I did a favour for him out of the goodness
4 of my heart because that's the way it was. When I did that
5 a few months later, I was busted for trafficking in
6 hashish.

7 **MR. CALLAGHAN:** All right.

8 So this is all happening at Pegasus
9 Restaurant, right?

10 **MR. OUELLETTE:** Yes, sir.

11 **MR. CALLAGHAN:** And you are painting a sign?

12 **MR. OUELLETTE:** Yes, sir.

13 **MR. CALLAGHAN:** Blue and white sign?

14 **MR. OUELLETTE:** I'm not sure of the colour,
15 but I'm pretty sure it could have been blue and white.

16 **MR. CALLAGHAN:** At Pitt and Fifth?

17 **MR. OUELLETTE:** Yup.

18 **MR. CALLAGHAN:** And just so I am clear, it
19 says in your handwriting:

20 "That officer heard me ask around for a
21 firearm. I mentioned I wanted to
22 settle the score with the chief of
23 police, that he was corrupt."

24 **MR. OUELLETTE:** M'hm. Yes, he is.

25 **MR. CALLAGHAN:** I hear that's your view.

1 Were you looking to buy a gun? Is that what
2 that was about? Did you ask ---

3 **MR. OUELLETTE:** At the time, I have to say I
4 have never raised my hand in violence to anybody, but at
5 the time I was considering it, yes.

6 **MR. CALLAGHAN:** But you've been -- no, no.
7 Let's be clear though. It's not only the wrong impression.
8 You've threatened lots of people, right? You've threatened
9 to blow up people? You've threatened Ministers ---

10 **MR. OUELLETTE:** I'm sorry. They
11 misunderstood what I said. They said I threatened.

12 **MR. CALLAGHAN:** Right.

13 **MR. OUELLETTE:** Who is the most threatened?
14 People who have their children taken away, been
15 brainwashed, put in jail for refusing fellatio, being
16 maltreated, being falsely imprisoned or the people -- or
17 the victims?

18 **MR. CALLAGHAN:** You don't deny ---

19 **MR. OUELLETTE:** Who is the one that is most
20 threatened, the victims or the people who are perpetrating
21 the crimes against the victims?

22 **MR. CALLAGHAN:** No, but, sir, I'm just ---

23 **MR. OUELLETTE:** Who in your perception would
24 be the most threatened if you have a Charter of Rights that
25 is supposed to protect you from that?

1 **MR. CALLAGHAN:** I don't know, but I guess
2 the -- what I am trying to get at, sir, is you say you are
3 not threatening and yet the records ---

4 **MR. OUELLETTE:** So whatever the records say
5 ---

6 **MR. CALLAGHAN:** --- between '97, you were
7 picked up six times ---

8 **MR. OUELLETTE:** --- even if I blew up and
9 even if I lost my temper ---

10 **THE COMMISSIONER:** One at a time.

11 **MR. OUELLETTE:** With all due respect, even
12 if I blew up and I lost all my composure, I think as a
13 parent, I think as a traumatized victim of crime, I think
14 as a victim of crime and a survivor, I have every right in
15 the world to be angry. And I think if you were violated,
16 sir, you'd be angry yourself.

17 **MR. CALLAGHAN:** I am sure I would. I think
18 ---

19 **MR. OUELLETTE:** So don't criticize me or
20 judge me for that.

21 **THE COMMISSIONER:** Okay, okay. Enough,
22 enough.

23 **MR. CALLAGHAN:** Fine.

24 All I am trying to get at, sir, is you said
25 yesterday that you wanted a gun to defend yourself.

1 **MR. OUELLETTE:** Wouldn't you want to defend
2 yourself?

3 **THE COMMISSIONER:** No, no, Mr. Ouellette --
4 -

5 **MR. OUELLETTE:** My life was threatened, sir.

6 **THE COMMISSIONER:** I know. I understand
7 that. Just sit back, Mr. Ouellette. This is one of the
8 occasions I am going to ask you to focus. Okay? He is
9 just going to ask you some questions. So please just
10 listen to it and answer the best you can. All right?

11 **MR. OUELLETTE:** All right.

12 **MR. CALLAGHAN:** Yesterday, you said you
13 needed a gun to defend yourself. Here you are saying you
14 wanted a gun to settle the score with Chief Shaver.

15 **MR. OUELLETTE:** Perhaps, but it's also
16 because I felt threatened and I wanted to defend myself
17 against a potential threat of being picked up at 2:00 in
18 the morning, brought to the dike and have two bullets
19 shoved in my brain, like they've threatened to do.

20 **MR. CALLAGHAN:** I'm just -- I'm not -- okay.
21 Thank you.

22 So this is 1980. This is five years later.
23 And then you go on to say:

24 "I told that same Constable Jay that
25 the judges and lawyers around here fuck

1 altar boys and that priests are fagots
2 that continue to tell the girls not to
3 be prostitutes that I know..."

4 **MR. OUELLETTE:** Yes, I did do that. I even
5 offered for them to stay at my home without rent and
6 without any hang-ups or hitch-ups, where I wouldn't demand
7 sexual favours from them because I know what it feels like
8 to be exploited.

9 **MR. CALLAGHAN:** Okay. I take it -- did you
10 buy the gun, sir, or did you not?

11 **MR. OUELLETTE:** I did not. I had a change
12 of heart. I'm allowed.

13 **MR. CALLAGHAN:** No, clearly. I'm glad you
14 did.

15 And did you buy it from Constable Jay or did
16 you -- did you attempt to buy it from Constable Jay or did
17 you ---

18 **MR. OUELLETTE:** Attempt to buy what?

19 **MR. CALLAGHAN:** The gun from Constable Jay?

20 **MR. OUELLETTE:** No, he was attempting to
21 find out where I could get one.

22 **MR. CALLAGHAN:** I see. Okay.

23 **MR. OUELLETTE:** I think he's got his facts a
24 little wrong.

25 **MR. CALLAGHAN:** And these aren't -- these

1 are your -- you wrote this?

2 **MR. OUELLETTE:** Part -- yes, I know, but
3 part of what went on in that restaurant, I have witnesses
4 to that effect. Okay? They were there. They heard it.
5 The manager, the workers that were delivery boys, they were
6 there when that conversation ensued and, if you want, I can
7 have them subpoenaed and you can ask them.

8 **MR. CALLAGHAN:** I am not interested in ---

9 **MR. OUELLETTE:** No, I'm sure you're not.

10 **MR. CALLAGHAN:** I'm just trying to -- this
11 is the story that Staff Sergeant Snyder was given.

12 **MR. OUELLETTE:** You are just trying to save
13 your own skin and you're doing a piss poor job at it.

14 **THE COMMISSIONER:** Okay. Enough of that.

15 **MR. CALLAGHAN:** That's fine.

16 So now, you go forward and you say on the
17 next page, you say that you were working at the -- "...while
18 awaiting trial dates and working full-time...", this is the
19 trial dates for the Project Jay?

20 **MR. OUELLETTE:** Yes.

21 **MR. CALLAGHAN:** And the Project Jay, I take
22 it, is your 1985 conviction? Would that be right?

23 **MR. OUELLETTE:** It's the conviction where I
24 was arrested and charged for seven grams of hashish.

25 **MR. CALLAGHAN:** Do you know whether that --

1 you have a conviction for trafficking in '82 and '85. Do
2 you know if it's in '85?

3 **MR. OUELLETTE:** I don't really recall. I
4 wouldn't remember what that would be for.

5 **MR. CALLAGHAN:** But at the time you are
6 working at the Brookdale Arms, right?

7 **MR. OUELLETTE:** That was for -- I believe
8 around 1989 and it was for defending my property.

9 **MR. CALLAGHAN:** Okay.

10 **MR. OUELLETTE:** I am the one who phoned the
11 police and reported a disturbance if it's only to get
12 arrested myself.

13 **MR. CALLAGHAN:** No, no. You're talking
14 about the incident with the nunchucks; right?

15 **MR. OUELLETTE:** Yes.

16 **MR. CALLAGHAN:** All right. That's not what
17 I'm talking about.

18 I'm talking about -- I just asked whether
19 you worked at the Brookdale Arms. I thought you said you
20 were painting apartments?

21 **MR. OUELLETTE:** I was painting apartments
22 that January.

23 **MR. CALLAGHAN:** And you say the two
24 officers, I think is what you said, came over?

25 **MR. OUELLETTE:** Two officers minimum came

1 over; brought me over to the dike.

2 MR. CALLAGHAN: Right.

3 MR. OUELLETTE: Separate cars, had a
4 conversation, brought me back to interview room number two.

5 MR. CALLAGHAN: Right.

6 MR. OUELLETTE: And threatened me with my
7 life.

8 MR. CALLAGHAN: Well, here you say:

9 "They brought me downstairs, shoved me
10 down steps."

11 MR. OUELLETTE: Actually, I was mistaken.

12 MR. CALLAGHAN: You were mistaken.

13 MR. OUELLETTE: It's another occasion where
14 they did shove me down the steps and I have a witness to
15 that effect, too.

16 MR. CALLAGHAN: Okay.

17 MR. OUELLETTE: I got it mistaken and it
18 overlapped in my memory.

19 MR. CALLAGHAN: I see.

20 MR. OUELLETTE: I was pulled up the stairs.

21 MR. CALLAGHAN: And you're pulled up. But
22 you know in an interview -- you know because you've been in
23 interview room number two; it's on the main floor of the
24 police station.

25 MR. OUELLETTE: Right, on the bottom of the

1 main floor right beside where they bring you in with the
2 car.

3 MR. CALLAGHAN: Right. So there weren't any
4 ---

5 MR. OUELLETTE: Where the stolen property is
6 kept.

7 MR. CALLAGHAN: There is no stairs up or
8 down?

9 MR. OUELLETTE: Yes, there is three stairs
10 going down.

11 MR. CALLAGHAN: Oh, I see.

12 So those are the stairs that you were
13 brought up as opposed to ---

14 MR. OUELLETTE: Pulled up.

15 MR. CALLAGHAN: Got shoved down as you
16 related ---

17 MR. OUELLETTE: No, pulled up. I was shoved
18 down on another occasion at another time.

19 MR. CALLAGHAN: All right.

20 MR. OUELLETTE: So I'm sorry about that.

21 MR. CALLAGHAN: No, don't be.

22 And then you said:

23 "Down here in the room they say --they
24 asked me about the threats to Ken, Dick
25 and the chief..."

1 So you're saying they asked you about this
2 threat that you gave this undercover officer?

3 **MR. OUELLETTE:** Yes.

4 **MR. CALLAGHAN:** Right.

5 **MR. OUELLETTE:** And they said that I was a
6 punk.

7 **MR. CALLAGHAN:** Right.

8 **MR. OUELLETTE:** And that I didn't deserve to
9 live and that if I ever opened my mouth again that they
10 would take me at about two o'clock in the morning walking
11 alone on the street when no one can see me.

12 **MR. CALLAGHAN:** Right.

13 **MR. OUELLETTE:** And that they would bring me
14 to the dike and put two bullets in my brain.

15 **MR. CALLAGHAN:** Right.

16 **MR. OUELLETTE:** And leave me there.

17 **MR. CALLAGHAN:** Right. And you say that in
18 the next page. "Anyway" and then you put "Detective
19 Lemire" -- you're pretty clear. It's Detective Lemire in
20 with the first detective, didn't ID him, and then you tell
21 the story you told; right?

22 **MR. OUELLETTE:** Yes.

23 **MR. CALLAGHAN:** And it's Detective Lemire
24 that pushed ---

25 **MR. OUELLETTE:** I could have been mistaken

1 about their identity because there's a lot of people that
2 look alike and it's possible I might have misidentified
3 them. As for the event, there is no mistake about that.

4 **MR. CALLAGHAN:** And where did you get the
5 name Detective Lemire?

6 **MR. OUELLETTE:** I ID'd him.

7 **MR. CALLAGHAN:** You ID'd him but you didn't
8 ID him ---

9 **MR. OUELLETTE:** I ID'd him by name before I
10 ID'd him by photograph.

11 **MR. CALLAGHAN:** You ID'd Detective Lemire --
12 -

13 **MR. OUELLETTE:** Well, I didn't ID him as a
14 detective. I just ID'd him as Mr. Lemire and ---

15 **MR. CALLAGHAN:** Well, you're saying that now
16 because you know that there isn't a Detective Lemire, do
17 you -- don't you? You know that ---

18 **MR. OUELLETTE:** I know that now that he was
19 a public servant and I was wondering what he was doing
20 there and it surprised me completely when I found out he
21 wasn't a constable.

22 **MR. CALLAGHAN:** So he's the guy that grabbed
23 you and threatened you?

24 **MR. OUELLETTE:** He grabbed me like this.

25 **THE COMMISSIONER:** By the throat?

1 **MR. OUELLETTE:** By the nerves of the throat,
2 rose me up above the ground by at least one foot, hung me
3 up against the wall. My body was shaking and quivering
4 because my nervous system had been pinched by the grasp and
5 he with his next finger, with a lot of pressure, put it up
6 against my temple a couple of times while he was saying,
7 "You fucking punk, I'm going to put two bullets in your
8 brain the next time you open your mouth about Ken Seguin".

9 **MR. CALLAGHAN:** And you now know that Mr.
10 Lemire is a records clerk?

11 **MR. OUELLETTE:** I don't care who he is ---

12 **MR. CALLAGHAN:** Right. Okay.

13 **MR. OUELLETTE:** ---he's the guy who did it.

14 **MR. CALLAGHAN:** He's the guy -- he's the guy
15 you pointed to. When you had the full lineup with
16 Constable -- Staff Sergeant Snyder you pointed -- right.

17 **MR. OUELLETTE:** Yes, I must point out that I
18 wasn't mistaken about his identity.

19 **MR. CALLAGHAN:** Right, and you told -- did
20 you not tell Staff Sergeant Snyder you could recognize him
21 because you had seen him in the newspaper getting an award?

22 **MR. OUELLETTE:** Yes, that's how I got his
23 first -- his second name. The other guy's name, I already
24 knew that name.

25 **MR. CALLAGHAN:** You already knew that name.

1 What name was that?

2 **MR. OUELLETTE:** From somewhere. I don't
3 know how.

4 **MR. CALLAGHAN:** I'll explain that in a
5 minute to you. How do you know -- what name was that?

6 **MR. OUELLETTE:** O'Reilly.

7 **MR. CALLAGHAN:** O'Reilly. Well, in fact,
8 sir, you do know now that you didn't point to O'Reilly.
9 You pointed to Officer Coté in the full lineup that -- you
10 don't know ---

11 **MR. OUELLETTE:** I know Constable O'Reilly's
12 license plate, what he drives today, where he lives right
13 now; okay?

14 **MR. CALLAGHAN:** All right. And I tell you -
15 --

16 **MR. OUELLETTE:** I am not mistaken. I don't
17 care if you believe me or not.

18 **MR. CALLAGHAN:** I am telling you, sir, that
19 the photo you picked out was Officer Coté.

20 **MR. OUELLETTE:** Now, it may very well be
21 Officer Coté. I don't care what their identities are. The
22 identities of the people are not important. It's the
23 manner in which the institutions have responded to my
24 complaints that are important.

25 **MR. CALLAGHAN:** We're getting to that. We

1 are reviewing what Staff Sergeant Snyder had to work with.
2 Let's review now.

3 So you have O'Reilly. You point out
4 O'Reilly as Coté. You point out Lemire, the records clerk?

5 **MR. OUELLETTE:** You never made a mistake in
6 your life, sir?

7 **MR. CALLAGHAN:** Sir, I am not above making
8 mistakes. Now, you made a mistake. Happy to hear about
9 it, but let's stay to the point.

10 Officer Coté and Officer O'Reilly, you knew
11 who they were because they sedated -- they held you down
12 while you were sedated?

13 **MR. OUELLETTE:** They did not hold me down.

14 **MR. CALLAGHAN:** Psychiatric ---

15 **MR. OUELLETTE:** I'm the one who made the
16 phone call through my ex to have them stop me from having
17 been sedated by a drug that I was allergic to which they
18 insisted on giving me anyway.

19 So I called for police assistance so I
20 wouldn't be assaulted because when you are assaulted with a
21 weapon or a touch within a three-foot span of your body
22 that is constituted as an assault on your person, and I
23 thought even as a patient that I had that right to refuse
24 that medication, being that I was allergic to it.

25 **MR. CALLAGHAN:** All right. Let's show you

1 document 736873.

2 **MR. OUELLETTE:** Sorry, Commissioner.

3 **THE COMMISSIONER:** No, that's no problem.

4 We will be taking a break soon in any event.

5 **(SHORT PAUSE/COURTE PAUSE)**

6 **THE COMMISSIONER:** Thank you.

7 Exhibit No. 597 is a letter from Ken
8 Ouellette to the Cornwall Police Force. Is there a date?
9 Any dates? Any idea of dates here?

10 **MR. CALLAGHAN:** There is no date, sir.

11 **--- EXHIBIT NO./PIÈCE NO. P-597:**

12 (736873) Letter from Keith Ouellette to
13 Cornwall Police Services Sgt. B.F. Wells

14 **MR. CALLAGHAN:** And also, if I could, I will
15 ask the clerk to get ready 713766, but I'll ask a few
16 questions about this first -- 713766. We'll deal with that
17 after if that's okay.

18 This is a complaint that you made to the
19 Cornwall Police, correct, sometime in '94?

20 **MR. OUELLETTE:** To George Feilotter, the
21 administrator of the hospital.

22 **MR. CALLAGHAN:** Well, this one -- if I have
23 given you the right -- if you have gotten the right
24 documents, should be addressed as Sergeant Wells.

25 **MR. OUELLETTE:** Yes, but I gave a copy to

1 the hospital.

2 MR. CALLAGHAN: All right. And your
3 complaint, essentially, was that you were at the hospital
4 and was that -- that was a psychiatric admittance?

5 MR. OUELLETTE: ER.

6 MR. CALLAGHAN: ER. And they called for
7 assistance or did you ask for assistance?

8 MR. OUELLETTE: I was asking for assistance
9 because I was in a crisis mode.

10 MR. CALLAGHAN: Right, and you were
11 complaining to the Cornwall Police?

12 MR. OUELLETTE: After they put me in
13 restraints by force which wasn't necessary because I was
14 just sitting as I am sitting now, causing no problem, okay,
15 in the hospital, they decided to offer me a pill, which I
16 refused. Upon refusing the pill, I was taken by force by
17 orderlies, strapped down, stomach first in a restrained bed
18 or cot and I was injected with two shots of Haldol or one
19 shot of Haldol, a very strong shot to which I'm allergic
20 to. And it's the first page on my chart, my medical chart,
21 "Allergies. Do not give this guy Haldol." Okay?

22 So because I knew it was Haldol and because
23 they told me they were administering me Haldol, I had my ex
24 phone up the police to protect me from receiving Haldol
25 because I regarded it -- Native American Church of God I'm

1 not allowed to take drugs, okay? I changed my life, okay?
2 I didn't want to be administered any drugs.

3 **MR. CALLAGHAN:** Okay, I understand that.
4 And you were ---

5 **MR. OUELLETTE:** Okay. That was ignored and
6 the police witnessed it being ignored.

7 **MR. CALLAGHAN:** Right, and you were upset
8 and you made ---

9 **MR. OUELLETTE:** So ethically they didn't do
10 their job.

11 **MR. CALLAGHAN:** And that was your complaint.
12 And this is your complaint here, the document ---

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

14 **MR. CALLAGHAN:** If I can have that marked
15 the next exhibit, Mr. Commissioner?

16 **THE COMMISSIONER:** Well, 597 is the letter.

17 **MR. CALLAGHAN:** I'm sorry, I missed it. My
18 apologies. If I could have the next document that I
19 referred to, 713766?

20 Now, this is not your signature on the
21 second page?

22 **THE COMMISSIONER:** Hold on. Are we talking
23 about the next exhibit?

24 **MR. CALLAGHAN:** Yes.

25 **MR. OUELLETTE:** Well, it's not my signature,

1 but if you read on it says Native American Church of God.

2 THE COMMISSIONER: No, no, we're going to
3 the next exhibit, 598 ---

4 MR. CALLAGHAN: I'm sorry, Mr. Commissioner,
5 I thought he had it.

6 THE COMMISSIONER: --- dated August 31st,
7 1994.

8 MR. OUELLETTE: Yes.

9 THE COMMISSIONER: It's a note from ---

10 MR. OUELLETTE: This is a farce.

11 --- EXHIBIT NO./PIÈCE NO. P-598:

12 (713766) Handwritten note from Keith
13 Ouellette dated 31 Aug 94

14 MR. CALLAGHAN: But just so I'm clear, all
15 I'm trying to get at; you made a complaint against two
16 Cornwall Police officers, Constable O'Reilly and Constable
17 Côté, right?

18 MR. OUELLETTE: Yes.

19 MR. CALLAGHAN: And that has to do with the
20 attendance in the hospital, right?

21 MR. OUELLETTE: Yes.

22 MR. CALLAGHAN: All right.

23 And you're telling me now that you currently
24 have Constable O'Reilly under -- you see him all the time?
25 You know where his licence ---

1 **MR. OUELLETTE:** I don't see him all the
2 time. I have his plates written down.

3 **MR. CALLAGHAN:** All right.
4 Why would you do that?

5 **MR. OUELLETTE:** To keep track of him so that
6 if he does threaten me, I'll be able to track him down and
7 report him again.

8 **MR. CALLAGHAN:** All right.
9 So in 1983 you say Constable O'Reilly
10 threatened you?

11 **MR. OUELLETTE:** Constable O'Reilly, the
12 balding-haired man with the glasses ---

13 **MR. CALLAGHAN:** No, I ---

14 **MR. OUELLETTE:** --- whoever that man was,
15 whatever his name was, threatened me, okay?

16 **MR. CALLAGHAN:** Okay.

17 **MR. OUELLETTE:** I don't care what his name
18 is. The fact is he threatened me. That's the facts. A
19 police officer has an oath to swear by, and if they do not
20 adhere to that, they are breaking moral and ethical code
21 and conduct. That means he's in the wrong, not me.

22 **MR. CALLAGHAN:** So let me understand this.

23 **MR. OUELLETTE:** So ask him.

24 **MR. CALLAGHAN:** All right.

25 So in 1983, if I get you right, Constable

1 O'Reilly or perhaps Constable Côté are identified in this
2 report in 1994, and do you make any suggestion that they
3 were threatening you in 1983?

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

6 MR. CALLAGHAN: Here you are in 1994.
7 You've just told me that this officer that you've just
8 described was part of a group that threatened you in
9 1983ish, and in 1994 you make a complaint about the very
10 same officer who ---

11 MR. OUELLETTE: Yes, sir.

12 MR. CALLAGHAN: Do you tell anybody about
13 the 1983 incident and 1994?

14 MR. OUELLETTE: Francine Gobeil.

15 MR. CALLAGHAN: Constin (sic) -- but nobody
16 in the police?

17 MR. OUELLETTE: Francine Gobeil and my Dr.
18 Franz Manouvrier.

19 MR. CALLAGHAN: I see. But you don't tell
20 the police. Here we are in 1994, making a public complaint
21 ---

22 MR. OUELLETTE: I just got finished -- I'm
23 telling you that I had been threatened with my life. Do
24 you think I'm going to approach a police officer and tell
25 him I've been threatened by police?

1 **MR. CALLAGHAN:** Well, you're making a
2 complaint against the same officer, according to what
3 you're telling me.

4 **MR. OUELLETTE:** Yeah, when I felt a little
5 bit more empowered by people who actually believe me
6 instead of people like you who don't believe a thing I say.

7 **MR. CALLAGHAN:** In 1994, sir, you make the
8 complaint. You don't say -- you make a complaint regarding
9 Constable O'Reilly and Constable Côté, but you don't raise
10 any of this allegation that you finally raise in 1999?

11 **MR. OUELLETTE:** So?

12 **MR. CALLAGHAN:** All right.

13 So you don't?

14 **MR. OUELLETTE:** So?

15 **MR. CALLAGHAN:** I'm just saying -- there's
16 no "so". Is that correct? I'm correct?

17 **MR. OUELLETTE:** It might be, but so what?

18 **THE COMMISSIONER:** Okay. Easy.

19 **MR. OUELLETTE:** What does that have to do
20 with sexual abuse, sir?

21 **THE COMMISSIONER:** Mr. ---

22 **MR. CALLAGHAN:** I didn't raise this issue.

23 **THE COMMISSIONER:** Mr. Ouellette, it's okay.

24 **MR. CALLAGHAN:** And you say here at the
25 bottom that your witness is June Crosswthaite. She's the

1 ---

2 **THE COMMISSIONER:** Just a minute now. I've
3 only got one page. Do we have it on the screen?

4 **MR. CALLAGHAN:** There should be a back page,
5 but that's okay. I'll move on to the next one -- to my
6 next point then.

7 If I can go back to the -- to Exhibit 596?

8 **THE COMMISSIONER:** How much longer do you
9 have, sir?

10 **MR. CALLAGHAN:** I have about another half
11 hour if you want to take a break.

12 **THE COMMISSIONER:** Pardon me?

13 **MR. CALLAGHAN:** I could take a break now or
14 we could continue.

15 **MR. OUELLETTE:** I find it hostile
16 questioning. Just for the record, I would just like to say
17 I think this is hostile.

18 **THE COMMISSIONER:** Well ---

19 **MR. OUELLETTE:** And it is ---

20 **THE COMMISSIONER:** No.

21 **MR. OUELLETTE:** --- incompassionate and
22 uncompassionate considering what victims and survivors have
23 been through. I think you're extremely callous in your
24 approach.

25 **THE COMMISSIONER:** All right, Mr. Ouellette,

1 we're going to take a break now.

2 Mr. -- this gentleman here is going to have
3 about a half an hour of cross-examination after we come
4 back from the break and then we will see what others have
5 to say.

6 **MR. OUELLETTE:** You mean confusion.

7 **THE COMMISSIONER:** No ---

8 **MR. OUELLETTE:** If you can't convince them,
9 confuse them.

10 **THE COMMISSIONER:** Mr. Ouellette, you're not
11 helping on those comments. Please focus. We'll take a
12 break and we'll come back and finish off. All right?
13 Thank you.

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

16 --- Upon recessing at 3:40 p.m./

17 L'audience est suspendue à 15h40

18 --- Upon resuming at 4:01 p.m./

19 L'audience est reprise à 16h01

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

22 The hearing is now resumed. Please be
23 seated. Veuillez vous asseoir.

24 **MR. CALLAGHAN:** Mr. Commissioner, there is
25 one further document on that last sequence regarding the

1 hospital I would like to have brought up. It's 736874. I
2 don't know if Madam Clerk has that.

3 **THE COMMISSIONER:** All right.

4 Exhibit 599 is a note from -- no, what is
5 this? Constable Côté, a memo from the "P" Team to Sergeant
6 B. Snyder.

7 --- **EXHIBIT NO./PIÈCE NO. P-599:**

8 (736874) Cst. B. Cote notes re: Keith
9 Ouellette dated 16 Feb 00

10 **KEITH-KENNETH OUELLETTE, Resumed/Sous affirmation**

11 **solennelle:**

12 --- **CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR MR.**

13 **CALLAGHAN (Cont'd/suite):**

14 **MR. CALLAGHAN:** Just to explain, Mr.
15 Ouellette, this is a report that was asked for by Sergeant
16 Snyder as a result of your complaint, and this is what
17 Constable Côté says about that incident you just explained
18 and I thought, in fairness, I should show it to you. It
19 says "As per your request" and the request was to see what
20 information he had about dealing with you, and he said:

21 "I have checked and the only time I can
22 remember having dealt with Keith
23 Ouellette was at the Cornwall General
24 Hospital. At this incident, I was
25 backup for Constable O'Reilly. He was

1 investigating the call. The incident
2 involved Ouellette being formed at the
3 CGH and he had become aggressive and
4 abusive with the staff. Both Constable
5 O'Reilly and I stood by while the staff
6 sedated him and then transported him to
7 3rd South. His wife was present the
8 entire time, and I believe it was she
9 who transported him to the hospital for
10 treatment. This is my only involvement
11 with the individual."

12 You don't remember it being -- you only take
13 issue with the fact that you weren't formed. You say you
14 went in the emergency?

15 **MR. OUELLETTE:** I was formed as a
16 consequence of going to the emergency.

17 **MR. CALLAGHAN:** Okay. If I could then,
18 before we look at Constable -- Staff Sergeant Snyder's
19 notes, this bundle of documents was first provided to recap
20 to the OPP on October 28th, 1999. And I just want to take
21 you to a note of Perry Dunlop's, 116241, and it should be
22 Bates Number 1091549.

23 **THE COMMISSIONER:** Excerpt of Officer
24 Dunlop's notes, Exhibit 600, October 29th, 1999.

25 --- EXHIBIT NO./PIÈCE NO. P-600:

1 (116241) Perry Dunlop's notes
2 re: Keith Ouellette dated 29 Oct 99

3 **MR. CALLAGHAN:** I'm sorry, Mr. Commissioner,
4 is that 600?

5 **THE COMMISSIONER:** Yes, it is.

6 **MR. CALLAGHAN:** Thank you, sir.

7 So this is the day after you submit this
8 material to the OPP. Does that assist you with your
9 discussions with Mr. Dunlop, the fact that the very next
10 day you have a discussion with him?

11 **MR. OUELLETTE:** On the phone, I did.

12 **MR. CALLAGHAN:** All right.

13 And how often would you have discussions on
14 the phone with him?

15 **MR. OUELLETTE:** Not very often.

16 **MR. CALLAGHAN:** All right.

17 And he said:

18 "Veronica McPhail called from the
19 station."

20 Who is Veronica McPhail? Is that ---

21 **MR. OUELLETTE:** I have no idea who Veronica
22 McPhail is.

23 **MR. CALLAGHAN:** That might be a different --
24 and it says "Call Keith" and then it gives a number.

25 Had you left him a message?

1 **MR. OUELLETTE:** I believe I might have
2 phoned Perry Dunlop after I had not showed up after a
3 little while, like after a couple of appointments missing
4 them. I'm not one to not be punctual and I figured I owed
5 him an interview. And I was kind of tempted to go and see
6 him, but again I was fearful, as you can see here because
7 it says ---

8 **THE COMMISSIONER:** All he is asking you, Mr.
9 Ouellette, is did you call him?

10 **MR. OUELLETTE:** I'm sure I called him at one
11 point or another.

12 **THE COMMISSIONER:** There you go. Okay.

13 **MR. CALLAGHAN:** All right.

14 **MR. OUELLETTE:** Sorry.

15 **THE COMMISSIONER:** That's okay.

16 **MR. CALLAGHAN:** Did you drop it off at the
17 OPP office?

18 **MR. OUELLETTE:** This?

19 **MR. CALLAGHAN:** No, the material we were
20 looking at?

21 **MR. OUELLETTE:** Some of the materials, yes.

22 **MR. CALLAGHAN:** So the handwritten notes?

23 **MR. OUELLETTE:** They didn't -- I believe I
24 didn't drop it off -- well, it's possible I dropped it off,
25 but I believe I called them to attend to my home and that's

1 when I gave it to him. It's possible though that I gave it
2 to them and dropped it off.

3 **MR. CALLAGHAN:** So we've seen earlier that
4 you had an earlier discussion with Constable Dunlop. That
5 was November 12th, '97.

6 **MR. OUELLETTE:** Yes, but not face to face.

7 **MR. CALLAGHAN:** Not face to face, but that
8 was two days after -- or two weeks I should say after you
9 -- or shortly two weeks after you leave the OPP on October
10 30th, '97. Here you are, the very next day after the OPP
11 receives your material, calling Perry Dunlop. Is that a
12 coincidence or were you keeping him informed?

13 **MR. OUELLETTE:** No, that was a coincidence.

14 **MR. CALLAGHAN:** I see, okay, and you called
15 him. You said, "You saved my life". Is that you saying --
16 -

17 **MR. OUELLETTE:** I said he saved my life in
18 the sense of finally someone is believing my story.
19 Somebody is believing my claims and that due to that fact I
20 don't feel as suicidal as I used to be.

21 **MR. CALLAGHAN:** And then give a note here;
22 you say, "fears for his life". I guess from the police?

23 **MR. OUELLETTE:** Yes.

24 **MR. CALLAGHAN:** And then you list a number
25 of ---

1 **THE COMMISSIONER:** Well, he doesn't list.

2 **MR. CALLAGHAN:** Well, I'm sorry, listed here
3 is a number of -- it says under the heading "Victim of".
4 And the first five you appear to have in the material that
5 you provide the OPP. The sixth I didn't see in there. Is
6 that something new?

7 **MR. OUELLETTE:** That's Father Bisailon. It
8 is not spelled correctly. René Bisailon was the Father
9 who replaced René Poirier at Sainte -- Lisieux -- Sainte
10 Thérèse de Lisieux, the church. And I was an altar boy.
11 This is a very long time ago. I was an altar boy. I was
12 about eleven or twelve years old.

13 And I was the head altar boy, and had to
14 have -- collecting the monies and everything. On one
15 occasion he came up behind me and rubbed himself on me.

16 **MR. CALLAGHAN:** I see. But this is not --
17 this isn't contained in the material that we looked at.
18 This is something new ---

19 **MR. OUELLETTE:** It was just an affirmation
20 that at least one member of the clergy from Cornwall had
21 attempted to assault me.

22 **MR. CALLAGHAN:** And is that at the prompting
23 of Perry Dunlop?

24 **MR. OUELLETTE:** No, it was by my own accord
25 and my own volition.

1 **MR. CALLAGHAN:** He says:

2 "Stated he reported it to police years
3 ago, Cornwall Police, about
4 assaults..."

5 And then you said:

6 "...said Shaver threw him out, became
7 agitated when he heard the name."

8 Do you see that?

9 **MR. OUELLETTE:** Yes.

10 **MR. CALLAGHAN:** All right.

11 So you earlier said that you might have
12 gotten the name Shaver from Dunlop. So that must have been
13 a prior conversation of this, right?

14 **MR. OUELLETTE:** Well, obviously, if I
15 identified Shaver to Dunlop, I must have known of his name
16 prior to talking to Dunlop.

17 **MR. CALLAGHAN:** All right. Well, I am just
18 trying to figure out where you got the name Shaver.

19 **MR. OUELLETTE:** So am I.

20 **MR. CALLAGHAN:** I see. So you are not sure.

21 **MR. OUELLETTE:** I am not sure.

22 **MR. CALLAGHAN:** It could have been Dunlop.
23 It could have been someone else?

24 **MR. OUELLETTE:** I don't believe it would
25 have been Dunlop. I don't know where I got it from.

1 Honestly I don't.

2 **MR. CALLAGHAN:** A moment ago you thought it
3 could be Dunlop. I am just trying to figure out why ---

4 **MR. OUELLETTE:** Well, I am jumping at --
5 clutching at straws. I don't really know where I got the
6 name Shaver from, but I do know I had, like I said,
7 appointments with chiefs of police and ---

8 **THE COMMISSIONER:** Okay.

9 **MR. OUELLETTE:** --- on different occasions,
10 it was two different chiefs of police.

11 **THE COMMISSIONER:** Mr. Ouellette.

12 **MR. CALLAGHAN:** And you said that when you
13 made the note about the threatening -- is this the last
14 time that you talked to Dunlop or is the occasion ---

15 **MR. OUELLETTE:** No, this is previous to a
16 meeting. I believe this is previous to meeting him at his
17 home. I might be mistaken, but I doubt it.

18 **MR. CALLAGHAN:** And you are not able -- just
19 so we are clear -- you are not able to give the number of
20 times you spoke with Mr. Dunlop. You can just say you met
21 him twice?

22 **MR. OUELLETTE:** About -- I met him once.

23 **MR. CALLAGHAN:** You met him once, sorry.

24 **MR. OUELLETTE:** In his basement, and I spoke
25 to him at least five times on the phone.

1 **MR. CALLAGHAN:** Who was in the basement when
2 you were there?

3 **MR. OUELLETTE:** Perry Dunlop, Dick Nadeau
4 and myself.

5 **MR. CALLAGHAN:** And was Helen Dunlop there?

6 **MR. OUELLETTE:** She was upstairs packing.

7 **MR. CALLAGHAN:** Was Carson Chisholm there?

8 **MR. OUELLETTE:** Don't think so.

9 **MR. CALLAGHAN:** Had you met Carson Chisholm?

10 **MR. OUELLETTE:** I met him here. Actually, I
11 met him through the Citizens for Renewal group because I
12 took part in trying to get different groups off of the
13 ground so that people in Cornwall could be made more aware
14 of what was happening.

15 **MR. CALLAGHAN:** So just so I'm clear, you
16 didn't get to know Carson Chisholm until when?

17 **MR. OUELLETTE:** Much later.

18 **MR. CALLAGHAN:** Much later. So much later
19 being 2002, 2003?

20 **MR. OUELLETTE:** I'm not sure about the
21 dates, but it was after Project Truth was downsizing and
22 disintegrating and that everybody was trying to forget that
23 it even happened and they were just saying nothing ever
24 happened in the papers, and it's all a bunch of crap.

25 And when that was happening, we were

1 organizing demonstrations in Alexandria for the Bishop at
2 the time to bring -- to make it public that we disagreed
3 with public findings and police findings.

4 **MR. CALLAGHAN:** And how about Dick Nadeau?
5 He was in the basement?

6 **MR. OUELLETTE:** He was in the basement.

7 **MR. CALLAGHAN:** You were dealing with him
8 throughout or talking to him? I mean, you talked about not
9 knowing him and knowing he was a person around and then
10 meeting him, and then dealing with him. Just maybe ---

11 **MR. OUELLETTE:** Dick Nadeau introduced me to
12 Perry Dunlop after he assured me that I had nothing to be
13 paranoid about and that he was a good cop and not a bad
14 cop, and that he was conscientious and that he was looking
15 out for the survivors and the victims' best interests, and
16 that he was investigating this.

17 **MR. CALLAGHAN:** Right.

18 **MR. OUELLETTE:** And that I should trust him.

19 **MR. CALLAGHAN:** Okay. And we know that you
20 met Dunlop on November 12th, '97. So that would have been
21 before that when you talked to Dunlop on November 12th, '97.

22 **MR. OUELLETTE:** On the phone.

23 **MR. CALLAGHAN:** Right. But you met Nadeau
24 before that?

25 **MR. OUELLETTE:** Approximately the same time

1 in about, say, a three-month period of the same time.

2 **MR. CALLAGHAN:** All right.

3 I want to show you or take you to and review
4 Staff Sergeant Snyder's notes, just if you can help me.
5 They will be found at Exhibit 736858.

6 And Mr. Commissioner, we have transcribed
7 the notes which I think you may want to give just an "A"
8 designation to so that people can -- I think there are some
9 typos in it. We did it over the last day or so just
10 because we were reading it and were finding it hard. Mr.
11 Dumais didn't think they were that difficult but I found
12 them very difficult.

13 So we have transcribed them. Perhaps what
14 we could do is make them an "A" exhibit or something for
15 identification purposes.

16 **THE COMMISSIONER:** Well, the originals
17 should be filed, right?

18 **MR. CALLAGHAN:** The original will be filed,
19 but just the transcription so that you can -- you are not
20 losing your eyesight.

21 **THE COMMISSIONER:** All right.

22 So 601 will be notes of Sergeant Snyder and
23 601a will be the transcribed notes.

24 --- **EXHIBIT NO./PIÈCE NO P-601:**

25 (736858) Handwritten notes of Sgt. Snyder

1 re: Keith Ouellette dated fr 29 Dec 99 to 25
2 Feb 00

3 --- EXHIBIT NO./PIÈCE NO P-601a:

4 CPS Transcribed notes of Sgt. Snyder re:
5 Keith Ouellette dated fr 29 Dec 99 to 25 Feb
6 00 referring to doc#736858

7 **THE COMMISSIONER:** All right.

8 **MR. CALLAGHAN:** Thank you.

9 **MR. OUELLETTE:** Thanks again.

10 **MR. CALLAGHAN:** Sir, I just want to review
11 with you -- and I don't want to go in because of the
12 earlier discussions with the Martel complaint, but there
13 were two complaints; the Martel complaint and the Chief of
14 Police and other officers' complaint, right?

15 **MR. OUELLETTE:** Yes.

16 **MR. CALLAGHAN:** All right.

17 So these notes will intermingle them both
18 because they were both -- you reported on those to Staff
19 Sergeant Snyder at the same time; correct?

20 **MR. OUELLETTE:** I believe so.

21 **MR. CALLAGHAN:** All right.

22 And just ---

23 **MR. OUELLETTE:** Are these -- okay. Yes.

24 **MR. CALLAGHAN:** Do you see what it is?

25 These are Brian Snyder's notes. I've given you a

1 handwritten copy which I think is illegible but others
2 think they might be easier to read, and then I had some
3 typed ones. And if there is a dispute, of which I see one
4 already, or a dispute between the two the handwritten win.
5 Okay?

6 **MR. OUELLETTE:** Okay.

7 **MR. CALLAGHAN:** And just so I'm clear, so
8 you met with Brian Snyder. And notwithstanding what you
9 say now, you were happy that Brian Snyder was doing it
10 because you knew him, right?

11 **MR. OUELLETTE:** Right.

12 **MR. CALLAGHAN:** Right. And you sat down
13 with him. And you'll see on December 30th, 1999 you sat
14 down and you gave him a video statement, right?

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

16 **MR. CALLAGHAN:** And then do you remember at
17 the end of it he asked you for written statements of the
18 occurrence? Do you recall that? I think we went over that
19 earlier.

20 **MR. OUELLETTE:** I don't recall perfectly,
21 no.

22 **MR. CALLAGHAN:** And the notes will go on.
23 You had indicated that you wanted him to use the OPP
24 material. Does that ring a bell?

25 **MR. OUELLETTE:** I think to make it easier on

1 myself, being that I had been working a hell of a long time
2 trying to convince people I was telling the truth, that I
3 was just plain exhausted and I wanted to make it as easy
4 and as less stressful on myself to give the information and
5 did my best to relay the information as correctly as I
6 could possibly muster at the time.

7 **MR. CALLAGHAN:** All right.

8 **MR. OUELLETTE:** So it's possible that I gave
9 him copies of things, yes.

10 **MR. CALLAGHAN:** All right.

11 And when you did your public complaint at
12 the end do you recall appending that document we were
13 referring to regarding 1978 to Shaver at the top? Do you
14 remember appending that?

15 **MR. OUELLETTE:** It's possible I gave it to
16 him, yes.

17 **MR. CALLAGHAN:** All right.

18 And I take it -- through these notes, if
19 someone were to read them, you'd spoke to him about a lot
20 of things. For example, you raised the complaint about
21 your child's grandfather, right?

22 **MR. OUELLETTE:** Yes.

23 **MR. CALLAGHAN:** And in fact, just so we're
24 clear, the Cornwall police investigated and charged, did
25 they not?

1 **MR. OUELLETTE:** Yes, they did, and they
2 dropped the charges or gave him house arrest.

3 **MR. CALLAGHAN:** All right.

4 And I know you're upset with the result, but
5 during this period the Cornwall police did actually listen
6 to you, investigate that allegation and charge the person
7 you say was the perpetrator, and indeed the Cornwall police
8 believed at the time of the charge ---

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

10 **MR. CALLAGHAN:** --- to be the perpetrator,
11 right? That's correct?

12 **MR. OUELLETTE:** Yes.

13 **MR. CALLAGHAN:** All right.

14 But during this time I take it that there is
15 a lot of -- in these notes, and I don't need to review them
16 all with you but I do want to touch base with them -- you
17 on them -- because I think it informs what Staff Sergeant
18 Snyder was dealing with.

19 You were very distraught, not just about
20 your allegations but about the CAS not allowing you to see
21 your children, right?

22 **MR. OUELLETTE:** Yes, I was.

23 **MR. CALLAGHAN:** All right.

24 And for example on January 13th, 2000 you
25 presented or called Sergeant Snyder -- it's on the third

1 page. And I take it you were comfortable calling Sergeant
2 Snyder because you had known him as a kid?

3 **MR. OUELLETTE:** I knew his brother. I went
4 to school with him.

5 **MR. CALLAGHAN:** Okay.

6 "Keith Ouellette called me and said
7 something important came up."

8 You said:

9 "CAS were not allowing him to see his
10 children because of the January 7th
11 incident. He did not want to kill
12 himself. It was a form of protest. He
13 said he called OPP Sergeant Simon Hardy
14 and told him that he would pretend to
15 attack him with a knife and he wanted
16 them to shoot him. Does that sound
17 like someone who wants to kill
18 someone?"

19 Then that and:

20 "At the hospital he was forced to take
21 medication, three needles that he was
22 allergic to, that he was kept three
23 days against his will. Why did they
24 give him medication?"

25 On the first page of the medical records, in

1 bright red, it's written "Caution" and with a 20-point font
2 which is bigger than newspaper headlines:

3 "They still gave medications. This is
4 a conspiracy against people who
5 complain to Project Truth. They are
6 fucked, you know."

7 And then you talk about J. Caron who was
8 someone who was shot.

9 Do you remember having that discussion with
10 Sergeant Snyder?

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

12 **MR. CALLAGHAN:** And I guess at that time you
13 were quite upset and distraught throughout this period
14 about your children and how you were dealing -- dealt with,
15 right?

16 **MR. OUELLETTE:** Yes.

17 **MR. CALLAGHAN:** And that would include, as
18 we talked about earlier, the way the Cornwall police
19 interceded when people said you were threatening them, and
20 that goes back a number of years, right?

21 **MR. OUELLETTE:** Yes.

22 **MR. CALLAGHAN:** And there are a host of
23 incidences, right?

24 **MR. OUELLETTE:** Yes.

25 **MR. CALLAGHAN:** All right.

1 And I won't put them to you but I think
2 we'll deal with that later.

3 And then over the next top of the page --
4 and I'm on the handwritten notes so I'm not following with
5 the screen. So I apologize. It says:

6 "He wanted me to arrest people at CAS
7 and Theresa, his ex-wife. He said,
8 'I'm withdrawing my complaint against
9 Cornwall police because nothing is
10 going to happen.' I told him that I
11 was working for him and that I would do
12 the best that I could. He said, 'I can
13 kill a man, anyone with a virus I can
14 make from my head.' I said, 'Is this a
15 threat?' He said, 'Has anyone ever
16 been hurt by me? It's not a threat.
17 You must have heard me wrong. If you
18 said it's the Ebola virus would that be
19 a threat? No, but I know how to make
20 it. This is the fourth time they do
21 this, turning my life upside down.
22 They made me mad.'"

23 Again, you're talking about the CAS, right?

24 **MR. OUELLETTE:** Yes.

25 **MR. CALLAGHAN:** And how they dealt with it.

1 And did you tell them you could make an
2 Ebola virus?

3 **MR. OUELLETTE:** It's easy to obtain.

4 **MR. CALLAGHAN:** And then, I take it -- I
5 mean, you're having this discussion where I guess you're
6 upset and if you read this Staff Sergeant Snyder is trying
7 to ascertain if whether you're making a threat or not,
8 right? Do you remember that?

9 **MR. OUELLETTE:** Yes, but at the time -- I'll
10 answer I guess he thought I was making a threat at the
11 time. But I think it's lawful to repel force with equal
12 force if you feel threatened, and I perceived a threat.
13 Therefore, I was acting accordingly.

14 **MR. CALLAGHAN:** And the threat was to your
15 children?

16 **MR. OUELLETTE:** I just wanted somebody to
17 hear my story and act on it and help my children from what
18 they're going through right at this minute.

19 **MR. CALLAGHAN:** But during this period when
20 you're talking to Staff Sergeant Snyder you're looking for
21 him to help you with CAS?

22 **MR. OUELLETTE:** I'm looking for help in
23 general. I'm looking for cooperation. I'm looking for
24 commonsense. I was looking across the board for someone to
25 sit down and use their head instead of their credentials

1 and use their hearts instead of words to understand what it
2 might feel like for someone who is poor and victimized ---

3 MR. CALLAGHAN: Right.

4 MR. OUELLETTE: --- to try to get help and
5 then get the help they require so that they can avoid
6 hurting their children and/or themselves and/or somebody
7 else.

8 MR. CALLAGHAN: And I guess that part of the
9 problem was you didn't have the funds to get the help you
10 needed, right?

11 MR. OUELLETTE: Exactly.

12 MR. CALLAGHAN: Right. Because in part you
13 hadn't gotten anything from Criminal Compensation, right?

14 MR. OUELLETTE: Plus I was on a pension.
15 Plus I didn't -- I wasn't employed anymore.

16 MR. CALLAGHAN: Plus the insurance company
17 didn't give you the money to ---

18 MR. OUELLETTE: And I just thought all the
19 way around that people just didn't care.

20 MR. CALLAGHAN: But you had a -- I take it
21 you had a pretty good relationship with Sergeant Snyder in
22 the middle and said:

23 "Is that a threat?"

24 He said:

25 "No, I'm not Keith Ouellette. I'm your

1 test. I'm the guy who can walk away
2 from help."

3 And then you say:

4 "The money you give a church is going
5 to child molesters, the Pope and the
6 Vatican and to the Nazis. It's a
7 conspiracy around the world. I take
8 care of wild animals that are hurt and
9 dead animals and bring them back from
10 death. Where I walk flowers go. I
11 want to show my children what a father
12 can be."

13 **MR. OUELLETTE:** Well, except for the fact
14 that I can bring back things from life to death. A seed
15 when you plant one is dead. When you plant it you revive
16 it. It lives, doesn't it?

17 **THE COMMISSIONER:** It's okay; it's okay.

18 **MR. OUELLETTE:** Like metaphors and analogies
19 are being misconstrued and misinterpreted and then used
20 against me, I could a lot of what you say against you, sir.

21 **MR. CALLAGHAN:** I'm sure you could.

22 **THE COMMISSIONER:** All right, enough.

23 **MR. CALLAGHAN:** I just want to -- I was just
24 trying to deal with what you're telling Sergeant Snyder. I
25 just want to take you to one last point on this. And he

1 said -- I take it in the middle it says:

2 "I said I would supervise visits so he
3 could see his children until things
4 straighten themselves out."

5 Like Brian was trying to help you, Sergeant
6 Snyder?

7 **MR. OUELLETTE:** By that time I began to have
8 my doubts.

9 **THE COMMISSIONER:** Did he volunteer to
10 supervise the access for your children?

11 **MR. OUELLETTE:** I don't recall him saying
12 that.

13 **MR. CALLAGHAN:** All right.

14 **THE COMMISSIONER:** Thank you.

15 **MR. CALLAGHAN:** You had said that -- I think
16 we were at a point; you had given the name of a witness,
17 June Crossthwaite, right?

18 **MR. OUELLETTE:** Yes.

19 **MR. CALLAGHAN:** And you had said that she
20 was at the apartment when the police came by?

21 **MR. OUELLETTE:** Well, it just so happens
22 that being that she was my employer and being that she told
23 me to go to the apartment that I was painting in, and it's
24 a complex of something like I don't know, maybe 250
25 apartments, Brookdale Arms, the only person that would have

1 knowledge as where to as I would be painting would be the
2 manager, and the police would have had to ask her where I
3 was in that building to find me.

4 For her to deny that she knew anything about
5 where I was or what happened is an outright lie.

6 **MR. CALLAGHAN:** All right.

7 So you are certain that she knew ---

8 **MR. OUELLETTE:** I am certain of that.

9 **MR. CALLAGHAN:** All right. If we could just
10 show you the document ---

11 **MR. OUELLETTE:** I have already seen the
12 document.

13 **MR. CALLAGHAN:** I know. Let me just show --
14 it hasn't been put as an exhibit, 736916.

15 Who showed you the document?

16 **MR. OUELLETTE:** Why would I approach her for
17 a letter if I didn't get threatened? I am the one who
18 asked her for the letter.

19 **MR. CALLAGHAN:** Oh, you asked her the
20 letter. I am sorry, okay. Because I've got ---

21 **MR. OUELLETTE:** She didn't offer that up. I
22 asked for it.

23 **MR. CALLAGHAN:** Well ---

24 **MR. OUELLETTE:** Why would I do that if I
25 didn't have a reason to?

1 **MR. CALLAGHAN:** Okay.

2 **THE REGISTRAR:** Can you give me that number,
3 please?

4 **MR. CALLAGHAN:** It's 736916.

5 **THE COMMISSIONER:** Almost done then, Mr.
6 Callaghan?

7 **MR. CALLAGHAN:** I think I may be a little
8 bit more, but I shouldn't be more than 15 minutes I hope.

9 **MR. OUELLETTE:** I am fine, Mr. Commissioner.
10 Trust me, I am.

11 **THE COMMISSIONER:** Six-oh-two (602) is a
12 letter from June Crossthwaite to Keith Ouellette.

13 --- **EXHIBIT NO./PIÈCE NO P-602:**

14 (736916) Letter fr June Crossthwaite (Brookdale
15 Apartments) to Whom it may concern re: Keith
16 Ouellette dated 11 Feb 00

17 **MR. CALLAGHAN:** So this is a letter that you
18 got?

19 **MR. OUELLETTE:** Yes, but it also says:
20 "I do not recall his being arrested".
21 I wasn't arrested. I was detained.

22 **MR. CALLAGHAN:** All right. Did you know
23 that Sergeant Snyder had spoken to her as well?

24 **MR. OUELLETTE:** I did know that.

25 **MR. CALLAGHAN:** Okay, and so ---

1 **MR. OUELLETTE:** But then she was kind of
2 like half demented and senile by the time that you probably
3 got to talk to her. So I'm not surprised she didn't
4 remember anything.

5 **MR. CALLAGHAN:** But when she talks about the
6 incident:

7 "There was an incident during the time
8 when he was arrested and charged by
9 Cornwall Police Department."

10 She has that right when you lived there,
11 right? She got that part right?

12 **MR. OUELLETTE:** Well, I was charged when I
13 started -- when I began living there in 1989 for defending
14 my property ---

15 **MR. CALLAGHAN:** But just ---

16 **MR. OUELLETTE:** --- and my privacy.

17 **MR. CALLAGHAN:** If we could go to the note
18 of Mr. or Constable Sergeant Snyder at February 3rd, 10:15?
19 In it, he says:

20 "I called June Crossthwaite at
21 Brookdale. Advised she only works part
22 time and was given her home number. I
23 called her and she remembers Keith
24 Ouellette working for her part time as
25 a painter. Will provide a copy of

1 application. She never saw him
2 arrested and leaving with police while
3 he worked for her. She remembers that
4 when he -- she was a resident there.
5 He was arrested for harassing kids in a
6 hall with some sticks. Could not
7 pronounce "nunchuck". She will provide
8 statement next week."

9 That is the incident -- that's a true
10 incident, the nunchuck incident? You did get arrested for
11 that?

12 **MR. OUELLETTE:** I had them in my hand.

13 **THE COMMISSIONER:** No, no, just "yes" or
14 "no".

15 **MR. CALLAGHAN:** No.

16 **MR. OUELLETTE:** Yes, I was charged with
17 prohibited weapon, possession of and ---

18 **THE COMMISSIONER:** Thank you. Thank you.

19 **MR. OUELLETTE:** --- and assault.

20 **MR. CALLAGHAN:** All right.

21 I just want to take you further on to the
22 10th of February. You attend -- you recall attending and
23 Sergeant Snyder showing you photo line-ups?

24 **MR. OUELLETTE:** Yes.

25 **MR. CALLAGHAN:** And you recall picking out

1 two officers, right?

2 MR. OUELLETTE: Yes.

3 MR. CALLAGHAN: And I don't know if you knew
4 at the time, but did you know you picked out civilian
5 Lemire and Constable Coté at the time?

6 MR. OUELLETTE: I thought I was picking out
7 O'Reilly and Lemire.

8 MR. CALLAGHAN: Okay, all right. And
9 O'Reilly was Coté's partner in '94 when they met you at the
10 hospital, right?

11 MR. OUELLETTE: Right.

12 MR. CALLAGHAN: All right.

13 If we can then go on to February 21st, 2000?

14 THE COMMISSIONER: What was the Bates page
15 number?

16 MR. CALLAGHAN: No, this is on the notes.

17 THE COMMISSIONER: I didn't know we were
18 going to the notes.

19 MR. CALLAGHAN: I'm sorry. You are right.

20 THE COMMISSIONER: So what date?

21 MR. CALLAGHAN: February 21st, 2000. I
22 apologize.

23 THE COMMISSIONER: Okay, we've got it.

24 MR. CALLAGHAN: I don't -- now, you had said
25 that -- were you overheard by Hope or spoke to Hope about

1 getting a gun in respect of Chief Shaver. Is that correct?

2 MR. OUELLETTE: The subject of obtaining a
3 firearm did come up during the conversation.

4 MR. CALLAGHAN: But your note says it is in
5 respect to the Chief of Police.

6 THE COMMISSIONER: It's not his notes.

7 MR. CALLAGHAN: No, those are his notes.
8 This is the note I referred to, his handwritten notes.

9 MR. OUELLETTE: I did write that down in ---

10 MR. CALLAGHAN: We can go back to them.

11 THE COMMISSIONER: Oh, okay, I'm sorry. I'm
12 sorry.

13 MR. OUELLETTE: As well as his notes, I
14 guess.

15 MR. CALLAGHAN: Right. I'm just saying you
16 needed a gun to deal with the Chief of Police, right?

17 MR. OUELLETTE: Yes, but was I honest about
18 it?

19 MR. CALLAGHAN: I know, but you said it.

20 MR. OUELLETTE: So I'm honest about the rest
21 too.

22 MR. CALLAGHAN: Okay. All I'm saying is,
23 were you aware that Sergeant Snyder spoke to now
24 Superintendent Hope, Jay Hope who as the note indicates:

25 "He does not recall the

1 conversation..."

2 Sorry.

3 "He heard this person. He wanted to
4 fire him to settle a score with the
5 Chief of Police. The superintendent
6 stated that he does not recall the
7 conversation or hearing him say it. He
8 further advised he does not recall
9 what. If it would have been a threat
10 against the Chief, he would have
11 remembered that. He would have taken
12 action at the time. I advised him I
13 would be making that notation in my
14 notes."

15 Now, did ---

16 **MR. OUELLETTE:** May I add to that?
17 He also denied being an undercover officer.

18 **MR. CALLAGHAN:** Right, at the time.

19 **MR. OUELLETTE:** So if he lied about that
20 then why wouldn't he lie about this?

21 **MR. CALLAGHAN:** Sure. And that was at the
22 time you were trying to get drugs and talking about the
23 gun, right?

24 **THE COMMISSIONER:** No, he wasn't trying ---

25 **MR. CALLAGHAN:** Trying to sell drugs.

1 **MR. OUELLETTE:** He was trying to entrap me
2 into getting him drugs.

3 **MR. CALLAGHAN:** And you wanted a gun.

4 **MR. OUELLETTE:** I was looking into the
5 matter.

6 **MR. CALLAGHAN:** Right. But that's the time
7 he lied to you?

8 **MR. OUELLETTE:** Yes.

9 **MR. CALLAGHAN:** Right.

10 **MR. OUELLETTE:** No, he lied to me at a later
11 incident within a week from the time that we had the
12 conversation at Pegasus.

13 **MR. CALLAGHAN:** And then, if I could, there
14 is a note to another video February 24th where as you fill
15 out the complaint and clarified that he believes it was
16 Claude Shaver that he spoke with in '78 about Hickerson and
17 company. Do you remember that conversation?

18 **MR. OUELLETTE:** It's -- I didn't -- I don't
19 remember that at all, but if he says that's what happened,
20 maybe that's what happened. Maybe it isn't. Maybe he lied
21 about that too.

22 **MR. CALLAGHAN:** And then he says:
23 "Also, when I showed him the name of persons involved and
24 said Lemire, he changed from paper. I asked him what he
25 meant. He said that is why he complained because his

1 picture was in the paper for getting an award, and you were
2 beside him, and it brought back memories."

3 So you saw Lemire's picture in the ---

4 **MR. OUELLETTE:** I definitely at some point
5 saw Lemire's paper (sic) in the paper.

6 I don't remember if I identified him from
7 the paper, but I recognized his face.

8 **MR. CALLAGHAN:** Just moving over to Emma
9 Wilson-King, can you just describe for me. You talk about
10 you met with her. She interviewed you. Correct?

11 **MR. OUELLETTE:** Yes. She is a short lady.
12 She's a half-native American or part-native American.

13 **MR. CALLAGHAN:** Yes.

14 **MR. OUELLETTE:** Probably all native.

15 **MR. CALLAGHAN:** The one thing, I doubt we
16 are going to have a dispute as to who she is.

17 So she interviews you and then you are aware
18 that she interviewed your brother, Richard?

19 **MR. OUELLETTE:** Yes.

20 **MR. CALLAGHAN:** All right.

21 And you are aware your brother -- just so it
22 is clear on the record, your brother adamantly denies the
23 allegation.

24 **MR. OUELLETTE:** I'm not surprised.

25 **MR. CALLAGHAN:** But just fair to him because

1 he said these things about him, he gave a statement. And I
2 won't go to the other investigations because you probably
3 weren't party to it, but your talk about this incident with
4 the Crown Attorney can you just -- you don't have to repeat
5 it, it's in the record, but where exactly was it and on
6 what occasion and who was there?

7 **MR. OUELLETTE:** You mean when I got really
8 pissed off at the Crown Attorney in the Justice building?

9 **MR. CALLAGHAN:** Well, you had said that Emma
10 Wilson-King said something to you.

11 **MR. OUELLETTE:** That was in the Justice
12 building right in the courthouse.

13 **MR. CALLAGHAN:** And what floor?

14 **MR. OUELLETTE:** Well, the new one, the main
15 floor.

16 **MR. CALLAGHAN:** Main floor. And do you
17 remember when it was?

18 **MR. OUELLETTE:** I don't remember when it was
19 but it was shortly after I had made these initial
20 complaints about my brother and I remember her calling me a
21 liar to my face.

22 **MR. CALLAGHAN:** Well, I think it was more
23 than that. But did you -- was it -- were you in a room, in
24 the hallway, in the presence of others?

25 **MR. OUELLETTE:** In the middle of everywhere,

1 just like here, in the middle of the waiting room where
2 everybody waits around to go to court.

3 MR. CALLAGHAN: So the Crown Attorney ---

4 MR. OUELLETTE: I wasn't taken into any
5 private room. It was like public.

6 MR. CALLAGHAN: And it was -- and the Crown
7 Attorney would have heard this?

8 MR. OUELLETTE: I'm not sure if the Crown
9 Attorney heard it, but I know Emma uttered those words.

10 MR. CALLAGHAN: Well, I just -- sorry, did
11 she whisper them to you? What did she say?

12 MR. OUELLETTE: No, she ---

13 MR. CALLAGHAN: I thought you said ---

14 MR. OUELLETTE: No, as loudly as I'm
15 speaking now to you.

16 MR. CALLAGHAN: All right.

17 So that's fairly loud. I mean, I can hear
18 you from here.

19 MR. OUELLETTE: I'm sure they can hear me
20 from there.

21 MR. CALLAGHAN: All right.

22 So who else was within that ear shot?

23 MR. OUELLETTE: About this many people.

24 MR. CALLAGHAN: About this many people heard
25 him say it. Okay. Can you name anybody?

1 **MR. OUELLETTE:** No, I didn't know who was at
2 court that day.

3 **MR. CALLAGHAN:** But you can name it was the
4 Crown Attorney, and you can name ---

5 **MR. OUELLETTE:** The Crown Attorney incident
6 is when Oscar St.-Denis got off the charges and she told me
7 that they were going to let him off the charges with just a
8 slap on the wrist.

9 And I gave her hell for that, and that was a
10 smaller occurrence but she said something to -- she
11 insulted and offended me politely, but that wasn't as
12 serious as what Emma did.

13 **MR. CALLAGHAN:** All right.

14 **MR. OUELLETTE:** Because what Emma did is
15 call me a liar and that is not true, because I can describe
16 the genitalia of all of the people that my brother
17 molested, and if I know that intimacy about them then I
18 must be telling the truth.

19 **MR. CALLAGHAN:** Sir, I'm not asking you why.
20 I'm asking you a very simple question.

21 I want to know who was there. Now you're
22 saying the Crown Attorney was not there or was she there
23 when this was stated in a situation where ---

24 **MR. OUELLETTE:** I think you're getting the
25 two incidences ---

1 **MR. CALLAGHAN:** All right.

2 **MR. OUELLETTE:** The Crown Attorney, as far
3 as Shelley what's-her-name is, okay, was involved with me.
4 It had nothing to do with my brother, it had something to
5 do with Oscar St.-Denis and the charges I was trying to
6 levy against him.

7 Emma was about my brother.

8 **MR. CALLAGHAN:** And you were just by ---

9 **MR. OUELLETTE:** And you're getting this
10 confused.

11 **MR. CALLAGHAN:** I'm totally confused. I'm
12 just trying to figure this out, sir.

13 Is this just the two of you having a
14 conversation? There's no other ---

15 **MR. OUELLETTE:** Emma walking away from me,
16 me following her, argumenting the point of how come you're
17 letting my brother get away with this. I can identify my
18 cousin's penis, et cetera, et cetera.

19 **MR. CALLAGHAN:** I don't ---

20 **MR. OUELLETTE:** And she says, "As far as I'm
21 concerned you're a fucking liar."

22 **MR. CALLAGHAN:** All right.

23 **MR. OUELLETTE:** And she turned her back on
24 me and kept on going.

25 **MR. CALLAGHAN:** All right.

1 I'm just trying to figure out who, if
2 anyone, can verify what you're talking about, and I'm
3 trying to figure out where it was ---

4 **MR. OUELLETTE:** God.

5 **MR. CALLAGHAN:** --- who was there and when.

6 Okay. I can't call Him. So what about
7 when. When did it happen? When do you say it happened?
8 When were you and Emma ---

9 **MR. OUELLETTE:** It was -- I'm not quite sure
10 when it happened, but I know it did and I know it happened
11 in the court.

12 **MR. CALLAGHAN:** Do you have a year, a month,
13 a day, a season, snow, sun?

14 **MR. OUELLETTE:** It was cold.

15 **MR. CALLAGHAN:** So it was cold.

16 **MR. OUELLETTE:** Probably by springtime by
17 them because it was very cold when I saw my brother at
18 McKeown's near that little girl.

19 **MR. CALLAGHAN:** But you can't help me out
20 anymore than that as to that incident?

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

22 **MR. CALLAGHAN:** All right.

23 Thank you. Those are my questions.

24 **THE COMMISSIONER:** Ms. Lahaie.

25

1 **MS. LAHAIE:** Good afternoon, Mr. Ouellette.
2 My name is Diane Lahaie and I'm counsel for the Ontario
3 Provincial Police.

4 I have no questions for you today.

5 **THE COMMISSIONER:** Thank you.

6 **MR. OUELLETTE:** Thank you.

7 **THE COMMISSIONER:** Mr. Carroll.

8 **MR. CARROLL:** My name is Carroll. I'm a
9 counsel for the OPPA, the Ontario Provincial Police
10 Association, and I have no questions for you this
11 afternoon.

12 Thank you.

13 **MR. OUELLETTE:** Thank you.

14 **THE COMMISSIONER:** Mr. Lee.

15 ---CROSS-EXAMINATION BY/CONTRE INTERROGATOIRE PAR MR. LEE:

16 **MR. LEE:** Good afternoon, Keith.

17 **MR. OUELLETTE:** Hi.

18 **MR. LEE:** Almost done.

19 I just want to get a couple of things
20 straight for the record.

21 You told us about abuse by a number of men
22 and I just want to get the chronology straight in terms of
23 who abused you first. So who was the first of the men
24 you've told us about that abused you?

25 **MR. OUELLETTE:** The very first person who

1 abused me sexually was my brother.

2 **MR. LEE:** Okay. And who comes next?

3 **MR. OUELLETTE:** Ken Seguin.

4 **MR. LEE:** And then?

5 **MR. OUELLETTE:** Richard Hickerson.

6 **MR. LEE:** And then?

7 **MR. OUELLETTE:** Lionel Currier attempted it.

8 **MR. LEE:** Where does Chris Wilson fit in
9 this?

10 **MR. OUELLETTE:** Soon after Lionel Currier.

11 **MR. LEE:** Okay. So your brother, Seguin,
12 Hickerson, Wilson; is that right?

13 **MR. OUELLETTE:** Yes.

14 **MR. LEE:** Did you at any point discuss what
15 had happened with your brother with Ken Seguin?

16 **MR. OUELLETTE:** With my brother? What
17 happened with ---

18 **MR. LEE:** You had been abused by your
19 brother long before you met Ken Seguin. Is that right?

20 **MR. OUELLETTE:** I spoke to Ken Seguin about
21 my brother but not the other way around.

22 **MR. LEE:** No, no, that's what I want to
23 know.

24 Can you tell us about that, about your
25 conversations with Seguin?

1 **MR. OUELLETTE:** Well, I spoke to Seguin
2 about my brother when I was 15 and-a-half, 15 years old. I
3 spoke to him again. He wrote pre-sentence reports for
4 different reasons, and in those pre-sentence reports
5 whether he wrote that down in them or not I'm not sure.
6 But I did state for the record that I had been abused and
7 that it had affected me psychologically, which then kind of
8 helped me be misguided and then turn to crime, which was
9 really drugs, okay, mostly, and the drugs were used to
10 alleviate the pain that I felt from being abused.

11 **MR. LEE:** Do you remember how Seguin reacted
12 when you told him about your brother?

13 **MR. OUELLETTE:** He seemed relieved.

14 **MR. LEE:** Why do you say that?

15 **MR. OUELLETTE:** Easy prey.

16 **MR. LEE:** Did you ever have a discussion of
17 that nature with Ken Seguin or was that your impression?

18 **MR. OUELLETTE:** I read people pretty good
19 and the look he had on his face was, "Oh, boy, here comes
20 another one".

21 **MR. LEE:** I would like to show you a
22 document you've already seen. It's Exhibit 585 and that's
23 the transcript of the OPP interview that was conducted on
24 October 30th, '97.

25 **MR. OUELLETTE:** Do I have it?

1 **MR. LEE:** I think you might have it in your
2 binder. I'm not sure if you do or not.

3 **THE COMMISSIONER:** It is in the binder.

4 **MR. OUELLETTE:** Five-eight-five?

5 **MR. LEE:** Five-eight-five, yes. It's about
6 35 pages.

7 **MR. OUELLETTE:** Okay.

8 **MR. LEE:** And I want to take you to page 3
9 of that?

10 **MR. OUELLETTE:** That's 0043?

11 **MR. LEE:** No, 0041 up at the top right.

12 **MR. OUELLETTE:** Okay.

13 **MR. LEE:** You were asked earlier today about
14 whether or not -- at the time of this interview, whether or
15 not you disclosed your abuse by your brother and I want to
16 take you to an excerpt here.

17 If you go down to the last entry where
18 you're speaking, the last one on the page, it says
19 "Ouellette".

20 Do you see where I am, Keith?

21 **MR. OUELLETTE:** Yes.

22 **MR. LEE:** "Well, um, started I guess when I
23 got out of jail." And they're asking you about, you know,
24 starting at the beginning and telling him the story, and
25 you say:

1 "Well, there was a person earlier but
2 when I got out of jail I was already
3 predisposed to sexual molestation."

4 Do you see that there?

5 **MR. OUELLETTE:** Yes.

6 **MR. LEE:** Are you referring to your brother
7 there?

8 **MR. OUELLETTE:** Yes.

9 **MR. LEE:** And I'd like to take you to page 8
10 as well. That will be 0046 in the top right corner.

11 **MR. OUELLETTE:** Okay.

12 **MR. LEE:** And Constable Seguin asks you at
13 the top of the page:

14 "Okay. What was your response to him
15 asking for oral sex?"

16 And you say:

17 "I didn't want to have nothing to do
18 with it."

19 And it goes down and gives some details.

20 And the last sentence of that entry was:

21 "And just because I was molested before
22 doesn't mean I want to be molested now,
23 you know."

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

25 **MR. LEE:** And again, does that refer to your

1 brother?

2 **MR. OUELLETTE:** It also refers to --
3 actually, that was like kind of like a response to him
4 coming onto me.

5 **THE COMMISSIONER:** And that's what you would
6 have said to Ken Seguin?

7 **MR. OUELLETTE:** That particular sentence was
8 my sensation that he was coming onto me and I was just kind
9 of trying to repel him without actually coming out and
10 saying "Get your hands off me" and whatever. It was sort
11 of like the way I was speaking to the lawyer previously,
12 like, you know, asking a question with a -- answering a
13 question with a question. That it is like cynical or
14 sarcastic -- to kind of back off. So this is what I was
15 attempting to do is get Ken Seguin to back off of me
16 because he was asking a lot of personal questions and I
17 found it inappropriate because it was a pre-sentence
18 report, kind of thing and/or probation kind of thing and I
19 didn't think it was appropriate for him to have to know if
20 I had a girlfriend or if I was having sexual relations, or
21 if
22 I had given a blowjob or not to somebody else.

23 **THE COMMISSIONER:** Okay. What do you ---

24 **MR. OUELLETTE:** I couldn't see the
25 relationship between probation and how sex had anything to

1 do with it.

2 **THE COMMISSIONER:** No, but the question was
3 are you referring to your brother as being ---

4 **MR. OUELLETTE:** Yes.

5 **THE COMMISSIONER:** "Just because I was
6 molested before" ---

7 **MR. OUELLETTE:** Yes, yes.

8 **THE COMMISSIONER:** The answer is yes?

9 **MR. OUELLETTE:** Yes.

10 **THE COMMISSIONER:** Thank you.

11 **MR. OUELLETTE:** I'm sorry; I just want to be
12 clear.

13 **THE COMMISSIONER:** Not a problem.

14 **MR. LEE:** That's fine. Keith, those are the
15 only questions I have for you.

16 **MR. OUELLETTE:** Okay.

17 **THE COMMISSIONER:** Thank you.

18 Mr. Dumais.

19 **MR. DUMAIS:** I've got nothing to add,
20 Commissioner.

21 Thank you, Keith.

22 **MR. OUELLETTE:** You're welcome.

23 **THE COMMISSIONER:** Mr. Ouellette, it's been
24 a long day for you and I appreciate the fact that you stuck
25 it out and you stayed with us. I can tell you that I have

1 taken notes and I've heard your comments, and I appreciate
2 your assistance in this regard.

3 All right? Thank you.

4 **MR. OUELLETTE:** Thank you.

5 **THE COMMISSIONER:** We'll come back ---

6 **MR. OUELLETTE:** Thank you for your patience.

7 **THE COMMISSIONER:** Not a problem. Thank
8 you.

9 Nine thirty (9:30).

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

12 This hearing is adjourned until tomorrow
13 morning at 9:30 a.m.

14 --- Upon adjourning at 4:47 p.m./

15 L'audience est ajournée à 16h47

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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