

**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 314

Held at :

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

Friday, November 28, 2008

Tenue à:

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

Vendredi, le 28 novembre 2008

ERRATA
Volume 308
November 20, 2008

Transcript

Page 114, Line 25, 20.

And then at Bates pages 033:

"Advised that CAS do have a file,
Leblanc, Jean-Luc, red shirt as a sex
offender..."

Should have read:

And then at Bates pages 033:

"Advised that CAS do have a file,
Leblanc, Jean-Luc, registered as a
sex offender..."

Appearances/Comparutions

Ms. Brigitte Beaulne	Registrar
Ms. Karen Jones	Commission Counsel
Ms. Suzanne Sinnamon	
Mr. Peter Manderville	Cornwall Community Police Service and Cornwall Police Service Board
Mr. Neil Kozloff	Ontario Provincial Police
Mr. Stephen Scharbach	Attorney General for Ontario
Mr. Peter Chisholm	The Children's Aid Society of the United Counties
Mr. Peter Wardle	Citizens for Community Renewal
Mr. Dallas Lee	Victims' Group
M ^e Gisèle Levesque	Diocese of Alexandria-Cornwall and Bishop Eugene LaRocque
Mr. Michael Neville	The Estate of Ken Seguin and Doug Seguin and Father Charles MacDougald
Mr. William Carroll	Ontario Provincial Police
Mr. Mark Wallace	Association
Mr. Frank T. Horn	Coalition for Action
C/Cst. Steve Seguin	

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1 --- Upon commencing at 9:35 a.m./

2 L'audience débute à 9h35

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

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

8 Please be seated. Veuillez vous asseoir.

9 **THE COMMISSIONER:** Thank you. Good morning,
10 all.

11 Ms. Jones, how are you doing this morning?

12 **MS. JONES:** Good morning. Thank you. Doing
13 well, thank you.

14 **D/CST. STEVE SEGUIN, Resumed/Sous le même serment:**

15 **THE COMMISSIONER:** Mr. Seguin.

16 **D/CST. SEGUIN:** Good morning, sir.

17 **THE COMMISSIONER:** Go ahead, Ms. Jones.

18 **MS. JONES:** Yes, before I ask any further
19 questions of Officer Seguin, I just wanted to enter in his
20 full notebooks because I've made a sort of a global
21 reference to them. One has already been entered, but I
22 think for the sake of completeness, we should be entering
23 all of them.

24 **THE COMMISSIONER:** Absolutely.

25 **MS. JONES:** So the first set are 733259,

1 733260, 733261, 733262, 733263, 733264, 733265, 733266,
2 733267, 733268, 733269.

3 --- EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN-CHEF PAR MS.
4 JONES (cont'd/suite):

5 MS. JONES: Good morning, Officer Seguin.

6 D/CST. SEGUIN: Good morning, ma'am.

7 MS. JONES: I'm just going to touch briefly
8 on a person -- just a moment, please.

9 I'd like to clarify this for the last time,
10 just to be sure. You recall that you met on February 10th,
11 1999 with a person called Cindy Lebrun?

12 Oh, footsteps behind me.

13 MR. MANDERVILLE: Mr. Commissioner, were all
14 those documents to be just entered as exhibits just now?

15 THE COMMISSIONER: I guess so.

16 MR. MANDERVILLE: Okay.

17 MS. JONES: Madam Clerk just asked me to
18 give her some time so we can get official numbers, so I
19 thought I would start asking questions.

20 THE COMMISSIONER: Sure.

21 MS. JONES: So on February 10th, 1999, I
22 understand that you took a video statement from a person,
23 Cindy Lebrun?

24 D/CST. SEGUIN: I'm not sure of the date.

25 MS. JONES: Take it -- well ---

1 **THE COMMISSIONER:** Humour us for now.

2 **D/CST. SEGUIN:** Okay, I'll agree with you.

3 **MS. JONES:** Okay. And do you recall that
4 the person that she was actually making the complaint about
5 was Jean-Luc Leblanc, the person we had finished with
6 yesterday?

7 **D/CST. SEGUIN:** Yes, that's correct.

8 **MS. JONES:** And that she had disclosed that
9 her abuse began when she was eight years old, had lasted
10 for several years, but other people in her family had also
11 been victimized by Jean-Luc Leblanc?

12 **D/CST. SEGUIN:** Oh, I know that other people
13 in her family were. I don't recall the dates of her abuse.

14 **MS. JONES:** Okay. And you're aware that it
15 was Cindy Lebrun and -- I believe Cindy Lebrun -- it was
16 certainly her mother that had initiated the call about
17 Jean-Luc Leblanc that started these numerous set of charges
18 against him?

19 **D/CST. SEGUIN:** I never looked at it as her
20 mother. That is correct, yes.

21 **MS. JONES:** And do you recall when you came
22 -- or how it was you first came contact with Cindy Lebrun
23 at her residence?

24 **D/CST. SEGUIN:** How I first came into
25 contact? On the day of the interview was the first contact

1 I had with her. I believe Joe Dupuis arranged the
2 interview with her.

3 **MS. JONES:** Do you recall that when you
4 first interviewed her you'd shown up at her door
5 unannounced?

6 **D/CST. SEGUIN:** Oh, that's -- I don't
7 believe that's the case. I believe Joe Dupuis set it up,
8 either a day or two before.

9 **MS. JONES:** All right. I'm just going to
10 take you to her transcript because she testified here and
11 spoke about that very event. The transcript is Volume 63 -
12 --

13 **THE COMMISSIONER:** Okay, well, hold on now.

14 **MS. JONES:** Sorry.

15 **THE COMMISSIONER:** No, no, let's finish the
16 exhibits first.

17 **MS. JONES:** Yes.

18 **THE COMMISSIONER:** And then we'll deal with
19 the transcript.

20 The bottom line is I think she's going to
21 testify that she had no forewarning and that you fellows
22 showed up on her doorstep.

23 **MR. CARROLL:** I think that's a fair
24 statement of the witness's evidence. I think for the sake
25 of completeness, though, Dupuis' evidence should also be

1 put to this witness -- that he believed he'd made a call
2 the day before.

3 **THE COMMISSIONER:** Right.

4 Exhibit 2705 is Constable Seguin's notes,
5 Document 733259; first date is April 15th (sic) 1998.

6 **--- EXHIBIT NO./PIÈCE NO. P-2705:**

7 (733259) - Notes of Steve Seguin dated from
8 May 15, 1998 to October 29, 1998

9 **THE COMMISSIONER:** Two-seven-zero-six (2706)
10 is notes of Officer Seguin and the first date -- Document
11 Number 733260; first date October 30th, 1998.

12 **--- EXHIBIT NO./PIÈCE NO. P-2706:**

13 (733260) - Notes of Steve Seguin dated from
14 October 30, 1998 to March 17, 1999

15 **THE COMMISSIONER:** Two-seven-zero-seven
16 (2707) is a Document Number 733261 and Officer Seguin's
17 notes; first date 18th of March (sic), 1999.

18 **--- EXHIBIT NO./PIÈCE NO. P-2707:**

19 (733261) - Notes of Steve Seguin dated from
20 May 18, 1999 to August 10, 1999

21 **THE COMMISSIONER:** Exhibit 2708 is Document
22 733262, notes of Officer Seguin; first date August 11th,
23 1999.

24 **--- EXHIBIT NO./PIÈCE NO. P-2708:**

25 (733262) - Notes of Steve Seguin dated from

1 August 11, 1999 to December 16, 1999

2 **THE COMMISSIONER:** Exhibit 2709, Document
3 Number 733263, is notes of Constable Seguin; first date
4 December 17th, 1999.

5 --- **EXHIBIT NO./PIÈCE NO. P-2709:**

6 (733263) - Notes of Steve Seguin dated from
7 December 17, 1999 to January 28, 2001

8 **THE COMMISSIONER:** Next is Exhibit 2710,
9 which is Constable Seguin's notes, Document Number 733264;
10 first date is 29th of January, '01.

11 --- **EXHIBIT NO./PIÈCE NO. P-2710:**

12 (733264) - Notes of Steve Seguin dated from
13 January 29, 2001 to September 5, 2001

14 **THE COMMISSIONER:** Two-seven-one-one (2711)
15 is the next exhibit. It's Document 733265, notes of
16 Officer Seguin; first date September 5th, 2001.

17 --- **EXHIBIT NO./PIÈCE NO. P-2711:**

18 (733265) - Notes of Steve Seguin dated from
19 September 5, 2001 to October 2, 2001

20 **THE COMMISSIONER:** Exhibit 2712 is -- again
21 is notes of Constable Seguin, Document 733266 -- notes of
22 Officer Seguin, date is October 3rd, 2001.

23 --- **EXHIBIT NO./PIÈCE NO. P-2712:**

24 (733266) - Notes of Steve Seguin dated from
25 October 3, 2001 to March 19, 2004

1 **THE COMMISSIONER:** Exhibit 2713 is again
2 notes of Constable Seguin, Document 733267; first date on
3 the package, 20th of May, '04.

4 **--- EXHIBIT NO./PIÈCE NO. P-2713:**

5 (733267) - Notes of Steve Seguin dated from
6 May 20, 2004 to October 6, 2004

7 **THE COMMISSIONER:** Finally, or almost
8 finally, Exhibit 2714 is Document 733268, Officer Seguin's
9 notes; first date October 7th, 2004

10 **--- EXHIBIT NO./PIÈCE NO. P-2714:**

11 (733268) - Notes of Steve Seguin dated from
12 October 7, 2004 to October 31, 2004

13 **THE COMMISSIONER:** And, finally, Exhibit
14 2715, which is Document 733269, notes of Constable Seguin;
15 first date is on the second page. October of 1996? No, I
16 don't think so.

17 In any event, it's a -- I've given Document
18 Number 733269, Officer's notes. We'll find out the dates
19 later.

20 **--- EXHIBIT NO./PIÈCE NO. P-2715:**

21 (733269) - Notes of Steve Seguin re: Dunlop
22 Death Threat

23 **THE COMMISSIONER:** Okay.

24 **MS. JONES:** Thank you very much.

25 **THE COMMISSIONER:** Now you want to go look

1 at a transcript?

2 MS. JONES: Yes, please.

3 Volume 63 and specifically looking at page
4 92.

5 THE COMMISSIONER: Thank you. Oh, not
6 stapled. Okay, what page are we looking at, Ms. Jones? Ms.
7 Jones?

8 MS. JONES: Thank you very much.

9 THE COMMISSIONER: What page?

10 MS. JONES: Page 92.

11 D/CST. SEGUIN: I have it.

12 MS. JONES: According to the testimony given
13 by Cindy Lebrun that day, about halfway down the page she
14 stated:

15 "Two officers showed up at my
16 residence. Not in uniform, they were
17 in suits and ties."

18 And Mr. Engelmann asked:

19 "Had you spoken to them before they
20 came?"

21 Ms. Lebrun said, "No."

22 On the next page, on page 93 at line 6,

23 "...and they were coming around to
24 investigate allegations of sex abuse
25 and that was the first day of the rest

1 of my -- it's like a train hit, a train
2 hit me.

3 Mr. Engelmann: Okay, you weren't
4 expecting this?

5 Ms. Lebrun: Not at all, no."

6 If you would like to refer then to Volume
7 309 please, to get Officer Dupuis's version of events, page
8 131.

9 (SHORT PAUSE/COURTE PAUSE)

10 MS. JONES: Page 131, please.

11 THE COMMISSIONER: Officer Seguin, it seems
12 from the transcripts that Cindy Lebrun says that she was
13 taken aback that you guys showed up and that you gave --
14 she gave you an interview the next day. Is that ---

15 D/CST. SEGUIN: I believe it was that day,
16 Mr. Commissioner.

17 MS. JONES: Sorry, I just wanted to find the
18 portion of the transcript for Mr. Dupuis -- for Mr.
19 Carroll's benefit. I believe it's line 22. When asked if,
20 this is under cross-examination:

21 "...that it would have been possible to
22 telephone Mrs. Lebrun in advance and
23 advise her that you wanted to speak
24 with her?

25 Mr. Dupuis said:

1 "If memory served me right, I think we
2 did but, again, I'm not a 100 percent
3 sure about that."

4 So from your perspective, had you contacted
5 Ms. Lebrun before going there to visit her?

6 **D/CST. SEGUIN:** I hadn't contacted her but I
7 believe Joe Dupuis did.

8 **MS. JONES:** Did you have a discussion about
9 that before you went there?

10 **D/CST. SEGUIN:** I don't recall what
11 conversation took place back then.

12 **MS. JONES:** Can you understand why a person
13 who was a victim of potential child abuse would find it
14 quite startling, as she has described in her own words?

15 **D/CST. SEGUIN:** Her version here, yes,
16 absolutely.

17 No, I had the opportunity to look at Joe's
18 notes and he did contact her, in his notebook.

19 **MS. JONES:** Does it specifically say he
20 telephoned her to make an appointment? The contact details
21 are there ---

22 **D/CST. SEGUIN:** M'hm.

23 **MS. JONES:** --- but it doesn't specifically
24 say that he made telephone contact with her to make the
25 appointment?

1 **D/CST. SEGUIN:** Maybe if I could be referred
2 to that it would help me.

3 **MS. JONES:** Well, we have Mr. Dupuis's
4 evidence that he gave here himself, saying he was not a 100
5 percent sure about the contact. That's probably the best
6 evidence of an interpretation of his notes.

7 **THE COMMISSIONER:** I don't know that much
8 turns on the fact as whether or not you told her or not.
9 What do you think is a proper practice when you're going to
10 do a Sylvie Lebrun -- Sylvie?

11 **MS. JONES:** Cindy.

12 **THE COMMISSIONER:** Cindy Lebrun kind of
13 approach?

14 **D/CST. SEGUIN:** Prior contact absolutely.

15 **THE COMMISSIONER:** So you would say that you
16 would phone up first and tell her what?

17 **D/CST. SEGUIN:** If it was a phone
18 conversation, sir, it would be something in the nature of,
19 we want to come and speak to you about Jean-Luc Leblanc.

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

21 **D/CST. SEGUIN:** And something that occurred
22 or something that we've heard occurred involving yourself.

23 **THE COMMISSIONER:** All right.

24 **D/CST. SEGUIN:** So she has a heads-up.

25 **THE COMMISSIONER:** Okay.

1 **MS. JONES:** That would be the usual
2 practice?

3 **D/CST. SEGUIN:** Yeah, that's what I do.

4 **MS. JONES:** Okay.

5 **THE COMMISSIONER:** So when you showed up
6 there, do you remember seeing her? Do you remember -- can
7 you visualize that?

8 **D/CST. SEGUIN:** I remember going to her
9 house, in the kitchen.

10 **THE COMMISSIONER:** How did she react when
11 she opened the door and you said, here we are?

12 **D/CST. SEGUIN:** Well, this is the part that
13 I guess I'm -- when I heard Mr. Lee's cross-examination
14 earlier and the comment about hit by a train, that's the
15 first I heard of that.

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

17 **D/CST. SEGUIN:** And that actually surprised
18 me because I don't remember that at all.

19 **THE COMMISSIONER:** M'hm, so you don't
20 remember if she manifested it outwardly?

21 **D/CST. SEGUIN:** Yeah, I didn't see that in
22 her, in her nature.

23 **THE COMMISSIONER:** Right, okay.

24 **MS. JONES:** So I'm going to move into the
25 Jacques Leduc matter, the first prosecution, not the second

1 one that you were involved with, but the very first
2 prosecution. And I understand that your role ---

3 **THE COMMISSIONER:** You mean the first
4 prosecution of Jacques Leduc?

5 **MS. JONES:** Jacques Leduc, yes.

6 **THE COMMISSIONER:** I thought there was only
7 one prosecution.

8 **MS. JONES:** This particular officer was the
9 lead investigator on the second trial of Jacques Leduc.
10 I'm talking about the first trial.

11 **THE COMMISSIONER:** Okay.

12 **MS. JONES:** The role that you had on the
13 first trial, I understand Officer Dupuis was the lead
14 investigator on that?

15 **D/CST. SEGUIN:** Yes.

16 **MS. JONES:** So your role on the first
17 prosecution or the first trial of Jacques Leduc, was that
18 you took several statements from various victims or
19 witnesses?

20 **D/CST. SEGUIN:** Yes, and I was in the
21 courtroom assisting the Crown.

22 **MS. JONES:** Did you -- you assisted on the
23 first one as well?

24 **D/CST. SEGUIN:** Yes.

25 **MS. JONES:** Now, there is a person with a

1 moniker C-22 that I wish to talk about, please.

2 (SHORT PAUSE/COURTE PAUSE)

3 MS. JONES: And I understand that you met
4 with C-22 at some point in your investigation?

5 D/CST. SEGUIN: Yes, on a number of
6 occasions.

7 MS. JONES: And I'm wondering if I could
8 please refer to a transcript, 308, specifically page 41.

9 D/CST. SEGUIN: Thank you.

10 MS. JONES: Page 41.

11 (SHORT PAUSE/COURTE PAUSE)

12 MS. JONES: And this is Mr. Dupuis' evidence
13 as well, or former Officer Dupuis' evidence, and I'm
14 looking down at line number 19 and Mr. Dupuis said in his
15 evidence:

16 "In any event, I believe he
17 would have attended C-22's home on the
18 2nd day of June, 1998."

19 I think it's supposed to be Mr. Dumais; it
20 says that. Mr. Dupuis said:

21 "We did attend his residence, yes.

22 Mr. Dumais: Right."

23 And then he looks at an exhibit.

24 And if you go to the next page, page 42,
25 line 7. Mr. Dumais said:

1 "It's fair to say that at this point C-
2 22 is reluctant to speak to you? Mr.

3 Dupuis: That is correct.

4 Mr. Dumais: And you're having this
5 conversation and you're trying to
6 convince him to provide a statement to
7 you. Is that correct?

8 Mr. Dupuis: We're asking for his
9 assistance, yes.

10 Mr. Dumais: And sometime in the middle
11 of this conversation he would have
12 agreed to come with you and provide you
13 with a statement. Is that correct?

14 Mr. Dupuis: That is correct.

15 Mr. Dumais: If I understand your notes
16 correctly, he would have gone back into
17 the house to get a pair of shoes on.
18 Is that correct?

19 Mr. Dupuis: That is correct.

20 Mr. Dumais: And my understanding is
21 that he never came back out. Is that
22 correct?

23 Mr. Dupuis: That's correct."

24 If we go to the next page, please.

25 "Mr. Dumais: And I understand that

1 this person -- or at least your notes
2 don't indicate that this person would
3 have identified himself or herself to
4 you? Mr. Dupuis: We never did find out
5 who that person was.

6 Mr. Dumais: Okay. And essentially
7 that person had indicated to you that
8 he did not -- that C-22 did not want to
9 talk to you; that essentially he was
10 dealing with it in his own way and was
11 refusing to go with you guys.

12 Mr. Dupuis: That's correct.

13 Mr. Dumais: And what was your response
14 to this third person who is not
15 identified?

16 Mr. Dupuis: We advised him that we
17 could subpoena him anyway."

18 So at this particular contact with C-22,
19 just to summarize, it seemed even from Officer Dupuis'
20 evidence that C-22, at that point, was reluctant to get
21 involved with the court process, and that the statement had
22 been made by either yourself or Officer Dupuis that he was
23 going to be subpoenaed if he didn't give a statement.

24 D/CST. SEGUIN: No, that's not the way it
25 came across.

1 **MR. CARROLL:** If I may, just for
2 clarification. Are we talking about June the 22nd as the
3 date on the transcript?

4 **THE COMMISSIONER:** I'm sorry?

5 **MR. CARROLL:** Because I don't believe
6 Officer Seguin was present for this. If it's June -- if
7 the date in the transcript is correct of June the 2nd?

8 **MS. JONES:** Perhaps I should clarify that.
9 I had understood that ---

10 **MR. CARROLL:** The 2nd or the 22nd?

11 **THE COMMISSIONER:** Okay, hold on, hold on;
12 one at a time.

13 **MR. CARROLL:** If I had -- I may have the
14 date wrong and if I'm wrong ---

15 **MS. JONES:** The date in the transcript says
16 the 2nd day of June.

17 Do you recall attending at C-22's residence?

18 **D/CST. SEGUIN:** Yes, I do.

19 **MS. JONES:** With Officer Dupuis?

20 **D/CST. SEGUIN:** Yes, I did.

21 **MS. JONES:** And you recall the situation
22 I've just described?

23 **D/CST. SEGUIN:** I recall that situation,
24 yes.

25 **MS. JONES:** I'd asked you if my

1 classification was a fair description. You said it was
2 not. How would you have interpreted then what went on,
3 please?

4 **D/CST. SEGUIN:** Your interpretation of the
5 subpoena being issued if he didn't provide us a statement
6 is not an accurate assessment of what occurred.

7 **MS. JONES:** Would you agree that that was
8 something communicated by Officer Dupuis at least to the
9 person, C-22?

10 **D/CST. SEGUIN:** It was not in that light.

11 **MS. JONES:** I'll just refer you to page 46,
12 please, of the transcript. And at line 7, Mr. Dumais,
13 who's Commission counsel, says:

14 "And would you then have advised him
15 that in any event he would be
16 subpoenaed. Is that correct?

17 Mr. Dupuis: That's correct.

18 Mr. Dumais said: "All right. So, I mean,
19 looking at this in hindsight, Mr.
20 Dupuis, is this the type of statement
21 you should have made to a victim or
22 alleged victim?"

23 Mr. Dupuis: No.

24 **THE COMMISSIONER:** So what's your
25 perception of what happened?

1 D/CST. SEGUIN: Yeah, and I certainly don't
2 want to get into semantics with words here with the way it
3 happened.

4 It's that whole concept of speaking to a
5 person, in this case C-22; he didn't want to be involved.
6 I just don't like counsel's representation of how that
7 subpoena issue came up.

8 It actually started earlier when I spoke to
9 him on a -- I was the first one to mention the subpoena
10 issue to him, Mr. Commissioner, and if I could have a
11 second, I could find it in my notes.

12 THE COMMISSIONER: M'hm.

13 MR. KOZLOFF: Twenty-eighth (28th) of May,
14 10:40.

15 THE COMMISSIONER: Sorry?

16 MR. KOZLOFF: (Off mic)

17 THE COMMISSIONER: No, I understand that.
18 Can you repeat it?

19 MR. KOZLOFF: Twenty-eighth (28th) of May,
20 10:40.

21 THE COMMISSIONER: So look at 28th of May,
22 sir, 10:40.

23 D/CST. SEGUIN: Yes, sir.

24 THE COMMISSIONER: Do you have it?

25 D/CST. SEGUIN: That's the initial contact I

1 had with C-22.

2 **THE COMMISSIONER:** All right. You can go.

3 **D/CST. SEGUIN:** I've heard other people do
4 this, Mr. Commissioner, and I've so much respect for these
5 kids. I'm sorry.

6 **THE COMMISSIONER:** No, and I think we all
7 understand that. And when we're listening to it, sir, you
8 know, you say, how could someone make that mistake, but
9 it's a little harder than what one might think.

10 **MS. JONES:** I'm sorry, what Bates page are
11 you referring to Officer Seguin?

12 **D/CST. SEGUIN:** Bates page 8451.

13 **THE COMMISSIONER:** And that's in Exhibit?

14 **D/CST. SEGUIN:** It's in my notes; 2705 is
15 the Exhibit, Mr. Commissioner.

16 **THE COMMISSIONER:** Okay.

17 **D/CST. SEGUIN:** That was the first contact.

18 **(SHORT PAUSE/COURTE PAUSE)**

19 **MS. JONES:** Bates page 7128451. Eight-four-
20 five-one (8451).

21 **D/CST. SEGUIN:** Would it be better, Mr.
22 Commissioner, if I had a couple of minutes? I could find
23 the exact entry I'm looking for.

24 **THE COMMISSIONER:** Let's take a break.

25 **THE REGISTRAR:** Order; all rise. À l'ordre;

1 veuillez vous lever.

2 This hearing will resume at 10:10 a.m.

3 --- Upon recessing at 10:01 a.m./

4 L'audience est suspendue à 10h01

5 --- Upon resuming at 10:14 a.m./

6 L'audience est reprise à 10h14

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

9 This hearing is now resumed. Please be
10 seated. Veuillez vous asseoir.

11 **D/CST. STEVE SEGUIN, Resumed/Sous le même serment:**

12 --- **EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN-CHEF PAR MS.**

13 **JONES (cont'd/suite):**

14 **THE COMMISSIONER:** Okay, let's try again.

15 **MS. JONES:** You said you were looking for an
16 entry in your notes, Officer Seguin?

17 **D/CST. SEGUIN:** Yes, ma'am.

18 And, Mr. Commissioner, I found it and it is
19 what I recall, but it did occur after this date. So the
20 initial one that we spoke about with C-22 where the
21 gentleman came out of the ---

22 **THE COMMISSIONER:** Yes.

23 **D/CST. SEGUIN:** --- the house; that was the
24 initial one about the subpoena issue.

25 **THE COMMISSIONER:** Okay, so you don't have -

1 - so what's your comments about what Commission counsel put
2 to you then? Well, let's go back.

3 D/CST. SEGUIN: Yeah.

4 THE COMMISSIONER: Okay.

5 MS. JONES: All right.

6 But let's -- perhaps the easiest way -- I
7 believe that your referral to your interpretation -- we may
8 be talking about two different things here, but if we
9 please go to your notes, Exhibit 2705, Bates page 8491.

10 By the way, Mr. Commissioner, before I
11 forget, there should be a publication ban on all of ---

12 THE COMMISSIONER: There are.

13 MS. JONES: --- Officer Seguin's notes.

14 Thank you.

15 THE COMMISSIONER: Thank you.

16 MS. JONES: The entry you have there about
17 the subpoena seems to be in relationship ---

18 THE COMMISSIONER: What page?

19 MS. JONES: Bates page 8491. The date of
20 these notes, by the way, would be the 30th of July, 1998.

21 That has to do with -- at this particular
22 point, he's still not really sure -- it sounds like if he
23 has to come to court, then he has to, and that's when you
24 say, well, we'll be sending you a subpoena when the court
25 comes around. That has to do with just getting the person

1 to the court. Is that the reference there?

2 D/CST. SEGUIN: Yes.

3 MS. JONES: Okay.

4 If we go though to your notes dated June 2nd,
5 1998, which -- and refer to Bates page 8456 -- the
6 description there is actually relating to the event that
7 I'm asking the questions about, which has to do with the
8 events of June 2nd, 1998, and these are your notes on this
9 particular event.

10 Just to paraphrase, it does seem that there
11 was some fellow -- this third person that came out, I
12 imagine quite aggressively towards you; he wasn't very
13 pleased with what was going on?

14 D/CST. SEGUIN: Very aggressive.

15 MS. JONES: And if we go though to Bates
16 page 8457 and it starts with "He said that". It appears
17 half way down the page, "He said that C-22 was having a
18 hard time".

19 That's right. If you could just scroll down
20 to the bottom of that page, please, Madam Clerk. Thank
21 you, that's great.

22 "He said that C-22 is having a hard
23 enough time dealing with this and he
24 didn't want to go with us. We told him
25 that C-22 wasn't in trouble; we wanted

1 his help to get his side of the story.
2 We told him that we could just 5 -- C-
3 22 a subpoena anyway and that second
4 subject said, just go ahead and give
5 him it. At that point, we left the
6 residence.

7 So that's the area that actually I'm asking
8 the questions about, that particular reference to a
9 subpoena.

10 **D/CST. SEGUIN:** Okay.

11 **MS. JONES:** You'd agree with me, regardless
12 of the inappropriate attitude of this other person, if
13 that's -- that's what you feel -- he was very aggressive
14 towards you, it's clear that he was going to be
15 communicating whatever you said back to C-22. Is that fair
16 to say?

17 **D/CST. SEGUIN:** Yes.

18 **MS. JONES:** And at that point ---

19 **D/CST. SEGUIN:** That'd be -- that's be my
20 understanding, yeah.

21 **MS. JONES:** Okay. And you're basically
22 telling this person that it doesn't matter if he's not
23 going to cooperate or not, we can just subpoena him anyway?
24 I mean, that's what your notes are actually saying there.

25 **D/CST. SEGUIN:** Yes. Yes and no.

1 Yes, it's exactly what's being said. The
2 confrontation was -- was what led to that. We were dealing
3 with a third party who was basically interfering and to the
4 point where I was considering arresting for obstruct.

5 **MS. JONES:** Your dealings with the third
6 party aside though, I'm focusing much more on your response
7 to the fact that C-22 at this point does not want to speak
8 with you?

9 **D/CST. SEGUIN:** M'hm.

10 **MS. JONES:** And it is a fair assessment
11 therefore then that you were trying to pass the message on
12 to C-22 that if he doesn't speak to us, we're going to
13 subpoena him?

14 **D/CST. SEGUIN:** Yeah, there could have been
15 a better way of delivering that.

16 **MS. JONES:** Okay. So it is consistent then
17 with what Officer Dupuis said as well of his recollection
18 of the meeting on June 2, 1998?

19 **D/CST. SEGUIN:** Yes, I'd say fairly
20 consistent, yes.

21 **MS. JONES:** And you'd agree that that's sort
22 of a -- a threat of a subpoena is probably not the best or
23 most appropriate way to deal with a potential victim of a
24 sexual assault?

25 **D/CST. SEGUIN:** Well, the delivery of that

1 message was not good.

2 MS. JONES: Thank you.

3 D/CST. SEGUIN: But you have to take into
4 consideration all the circumstances.

5 THE COMMISSIONER: I will.

6 D/CST. SEGUIN: Thank you.

7 MS. JONES: I'm going to be focusing now on
8 the conduct of the case with respect to the Jacques Leduc
9 trial, and you had stated earlier and confirmed that you
10 were, in fact, the investigating officer that helped the
11 Crown who at that time was Shelley Hallett. Is that
12 correct?

13 D/CST. SEGUIN: The second time around?

14 MS. JONES: The first time around?

15 D/CST. SEGUIN: The first time around, I was
16 one of the two officers. Joe and I both -- Joe Dupuis and
17 I both helped.

18 MS. JONES: And -- I'm sorry?

19 D/CST. SEGUIN: Both helped.

20 MS. JONES: Okay.

21 And you recall that you actually assisted
22 Ms. Hallett in other prosecutions as well, namely Dr.
23 Peachy, Malcolm MacDonald and the Dufour matters?

24 D/CST. SEGUIN: Yes.

25 MS. JONES: And we're going to be looking at

1 a few items that deal with Ms. Hallett, but one of the
2 concerns that you had about her when you were doing this
3 assistance in the court on a fairly regular basis, one
4 concern that you brought up was that she was late for
5 court; that you didn't have a chance to speak with her
6 before court started frequently?

7 D/CST. SEGUIN: I take it you're referring
8 to the York Regional Police investigation?

9 MS. JONES: Well, just ---

10 D/CST. SEGUIN: I relayed my concerns at
11 their request, yes.

12 MS. JONES: Okay. But did you -- was that
13 your general impression when you were working with the
14 Crown at that time, Crown Hallett?

15 D/CST. SEGUIN: Yes.

16 MS. JONES: Okay. And there were also --
17 you were also concerned, I understand as well, with the
18 number of meetings and the length of time that she spent
19 with witnesses?

20 D/CST. SEGUIN: Yes. Again, that's through
21 York Regional Police's request.

22 MS. JONES: And do you recall ---

23 THE COMMISSIONER: Well, just a minute --
24 just a minute.

25 What about the length of time that she took

1 with witnesses? Was there too much; too little?

2 D/CST. SEGUIN: Yes, too much, sir.

3 THE COMMISSIONER: Too much with the
4 witnesses?

5 D/CST. SEGUIN: Yes, my opinion.

6 THE COMMISSIONER: Okay. And you were there
7 with the witnesses when she was preparing them or ---

8 D/CST. SEGUIN: Yes, I was -- if you'd like
9 me to expand on that, sir?

10 THE COMMISSIONER: Yeah?

11 D/CST. SEGUIN: I was involved in a number
12 of preparatory interviews with the Crown in preparation of
13 the trial, and as well so was Joe Dupuis, sometimes
14 together; sometimes just one of us there.

15 And it became excessive when the witnesses
16 or the victims didn't want to be a -- participate in this
17 anymore.

18 THE COMMISSIONER: M'hm.

19 D/CST. SEGUIN: And those comments about my
20 opinion of that were based on the York Regional Police
21 investigation asking me those particular questions.

22 THE COMMISSIONER: M'hm.

23 D/CST. SEGUIN: So I thought it became an
24 issue as far as disclosure obligations. Every time that
25 the story was told, there was a new story.

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

2 **D/CST. SEGUIN:** And we gave defence a heyday
3 for cross-examination.

4 So I had issues that way, plus the
5 fragility, I guess, of these witnesses or victims. That
6 was a big issue.

7 **THE COMMISSIONER:** Okay, but is, but how do
8 you relate it back to Hallett now?

9 **D/CST. SEGUIN:** She was the one that was
10 requesting the continuous interviews ---

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

12 **D/CST. SEGUIN:** --- and our communication
13 with the victims.

14 **THE COMMISSIONER:** M'hm. Did you voice this
15 concern to her?

16 **D/CST. SEGUIN:** Good question. I don't know
17 if I ever did.

18 **THE COMMISSIONER:** Okay. Go ahead, Ms.
19 Jones.

20 **MS. JONES:** Thank you.
21 Perhaps I could take you to Document 701553.

22 **THE COMMISSIONER:** It's a new one, sir.

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

24 **THE COMMISSIONER:** Thank you.

25 **D/CST. SEGUIN:** Thank you.

1 **THE COMMISSIONER:** Exhibit 2716 is Document
2 701553. It's a Will Say of ---

3 **MS. JONES:** It's the Will Say of Officer
4 Seguin.

5 **THE COMMISSIONER:** And what date have we got
6 then?

7 **MS. JONES:** I don't believe it's dated.

8 **THE COMMISSIONER:** Okay. In any event, I've
9 given you the document number. It's a Will Say of this
10 officer.

11 **MS. JONES:** Madam Clerk, what was the
12 Exhibit number?

13 **THE COMMISSIONER:** Two-seven-one-six (2716).

14 **--- EXHIBIT NO./PIÈCE NO. P-2716:**

15 (701553) - Will Say of Steve Seguin re:
16 Involvement of Crown Attorney Shelley
17 Hallett.

18 **MS. JONES:** Thank you.

19 We were just talking about some of the
20 concerns that you had with respect to Crown Hallett's
21 contact with victims or witnesses, and I just want to refer
22 you to the last page of that particular statement. This is
23 Bates page 3960.

24 **(SHORT PAUSE/COURTE PAUSE)**

25 **D/CST. SEGUIN:** Yes.

1 **MS. JONES:** So that essentially is
2 confirming your concerns with the meetings with Crown
3 Hallett and various victims and witnesses.

4 And, in fact, you stated in your words:
5 "One of the most serious issues in
6 the Leduc matter was Ms. Hallett's
7 inability to leave witnesses alone."

8 And I'm going to give a document to you. I
9 think that it was prepared by you, Document 105643.

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

11 **THE COMMISSIONER:** Thank you.
12 Exhibit Number 2717 is Document 105643,
13 which is -- are details of meetings with victims and
14 witnesses by Crown Shelley Hallett. And this was prepared
15 by you, sir, this document?

16 **D/CST. SEGUIN:** Yes, sir.

17 **--- EXHIBIT NO./PIÈCE NO. P-2717:**
18 (105643) - List by Steve Seguin re: Meetings
19 with Victims/Witnesses by Crown Attorney
20 Shelley Hallett

21 **THE COMMISSIONER:** Okay. And basically it
22 outlines how much time she was spending with witnesses?

23 **D/CST. SEGUIN:** Yes.

24 **THE COMMISSIONER:** And when did you prepare
25 this?

1 D/CST. SEGUIN: This, as well, was prepared
2 in relation to the York Regional Police investigation.

3 THE COMMISSIONER: And so you would have
4 gone back to your notes to see?

5 D/CST. SEGUIN: Yes, out of my notebook,
6 sir.

7 THE COMMISSIONER: Okay.

8 MS. JONES: And if there could be please a
9 publication ban on the previous two -- these last two
10 exhibits, please, Mr. Commissioner?

11 THE COMMISSIONER: Yes.

12 MS. JONES: So were you present as well then
13 for all of these interviews?

14 D/CST. SEGUIN: All of these interviews I
15 was part of, yes.

16 MS. JONES: And were you aware if there were
17 other interviews -- and this may sound odd -- that you were
18 not present for? In other words, you would have maybe
19 witnessed her in the room somewhere with a witness?

20 D/CST. SEGUIN: I know that -- I know that
21 there were many more and I think -- I believe Joe Dupuis
22 has an identical document or not identical, but his own
23 version.

24 MS. JONES: Right. That was my other
25 question. So there were actually other meetings, not just

1 these meetings? These were just the ones you were present
2 for?

3 **D/CST. SEGUIN:** Yes.

4 **MS. JONES:** Okay. And so another concern
5 that came out in this statement that we just looked at,
6 2716, was that there was very little time for you to
7 discuss things; that she was running late.

8 And there was another Crown on the case,
9 Christine Tier, but I understand from your perspective she
10 was available and there weren't any lateness issues with
11 her?

12 **D/CST. SEGUIN:** Yes.

13 **MS. JONES:** But any decisions made on the
14 conduct of the case, they'll still have to go through
15 Shelley Hallett?

16 **D/CST. SEGUIN:** Yes. Christine Tier was her
17 assistant and Shelley Hallett made all the decisions that I
18 was aware of that I saw.

19 **MS. JONES:** Now, I understand that on
20 February 7th, 2001 this was the day that C-16's mother was
21 testifying. Perhaps Madam Clerk could show who C-16 is to
22 the witness.

23 Do you have a little note pad that you're
24 keeping track of the monikers, by the way, Officer Seguin?

25 **D/CST. SEGUIN:** I'm attempting to.

1 **MS. JONES:** Okay. It's very helpful, I
2 find.

3 Were you present in court when C-16's mother
4 was testifying?

5 **D/CST. SEGUIN:** Yes, I was.

6 **MS. JONES:** So you literally witnessed
7 first-hand the revelation that was quite a turning point in
8 the Jacques Leduc prosecution?

9 **D/CST. SEGUIN:** Yes.

10 **MS. JONES:** And I also understand that once
11 the court recessed, that there was obviously going to be a
12 discussion with the officers and Crown Hallett afterwards,
13 and I understand there was a meeting that you participated
14 in with Crown Hallett, Christine Tier, Officer Hall and
15 Officer Dupuis. Do you recall that?

16 **D/CST. SEGUIN:** I recall the meeting. Is it
17 listed on my response here to the York Regional Police? Is
18 it in this document as well?

19 **MS. JONES:** Yes, I believe so.

20 **D/CST. SEGUIN:** Okay, yes.

21 **MS. JONES:** Yes?

22 And I understand that shortly thereafter
23 yourself, Officer Hall, Crowns Hallett and Tier then met
24 with Steven Skurka and Phil Campbell, who were the defence
25 counsel for Leduc?

1 D/CST. SEGUIN: Yes.

2 MS. JONES: And it would also appear that
3 the Dunlop material was provided to the defence counsel at
4 this particular meeting, and at that meeting Mr. Skurka
5 accused Officer Hall of failing to disclose relevant
6 evidence?

7 D/CST. SEGUIN: That's correct.

8 MS. JONES: And when Mr. Skurka questioned
9 Crown Hallett about the missing disclosure, she said she
10 didn't know about the evidence prior to that?

11 D/CST. SEGUIN: That's correct.

12 MS. JONES: And I also understand that when
13 the meeting ended, you had met with Officer Hall, Crowns
14 Hallett and Tier in another room or in another meeting, and
15 Officer Hall said to Crown Hallett that she did in fact
16 have the material in her possession, and he provided the
17 dates when she would have received it?

18 D/CST. SEGUIN: Yes.

19 MS. JONES: And do you also recall Officer
20 Hall, either that time or thereafter, saying or noting that
21 Officer Hall could have raised that issue actually in front
22 of defence but waited specifically until the defence left
23 to bring up this issue, not in their presence?

24 D/CST. SEGUIN: Yes, very well.

25 MS. JONES: Okay.

1 And on the morning of February 8th, 2001,
2 Officer Hall gave you a memo dated July 4th, 2000 from Crown
3 Hallett to Dupuis, in which she indicated she had received
4 a copy of Dunlop's Will State and she intended to return to
5 Cornwall to complete her review of the Dunlop materials?

6 **D/CST. SEGUIN:** I'm reading the line below
7 what we were just talking about and I ---

8 **MS. JONES:** Yeah.

9 **D/CST. SEGUIN:** You kind of lost me there.
10 I've got the letter from Hallett to Dupuis
11 and it says, regarding Perry Dunlop's notes being disclosed
12 to her.

13 **MS. JONES:** Okay, so had you taken a copy of
14 that particular memo?

15 **D/CST. SEGUIN:** Yes. I gave her a copy of
16 it that morning in court.

17 **MS. JONES:** And it was Officer Hall that
18 instructed you to give that memo?

19 **D/CST. SEGUIN:** Yes.

20 **MS. JONES:** And I also understand that you
21 were cross-examined by Mr. Skurka on February 21st, 2001 and
22 you did have in evidence that you had witnessed a brief
23 conversation between Crown Hallett and Dick Nadeau?

24 **D/CST. SEGUIN:** Yes.

25 **MS. JONES:** And I also understand this is

1 the only time you've ever crossed -- testified in any
2 Project Truth case. Is that true?

3 D/CST. SEGUIN: Yeah, well, the officers
4 didn't have to testify very often in this case.

5 MS. JONES: Okay.

6 D/CST. SEGUIN: These cases, sorry.

7 MS. JONES: On February 26th, 2001, at the
8 conclusion of the application for a stay of proceedings, I
9 understand that you met with Crown Hallett and Crown Tier,
10 a law student and Officer Dupuis, and you recalled that Ms.
11 Hallett was particularly upset with Officer Hall, and
12 perhaps the other OPP officers as well, but specifically
13 Officer Hall. Do you recall that?

14 D/CST. SEGUIN: Yes.

15 MS. JONES: Just a moment, please.

16 (SHORT PAUSE/COURTE PAUSE)

17 MS. JONES: I wonder if we could please go
18 to -- sorry, Exhibit 2710. These are the officer's notes,
19 please.

20 (SHORT PAUSE/COURTE PAUSE)

21 MS. JONES: Sorry, I've lost my Bates page
22 reference, I'm afraid. I'm just re-finding it.

23 If we could please go to Bates page 9547.
24 I'm specifically looking at an entry relating to the date
25 of 20th of February, 2001.

1 D/CST. SEGUIN: I have it.

2 MS. JONES: Okay. I'm just wondering if you
3 could just briefly read over the entry there because I'm
4 going to ask you about something that doesn't appear to be
5 in your notes for February 20th?

6 D/CST. SEGUIN: Which portion are you asking
7 me to read?

8 MS. JONES: The date of February 20th,
9 please.

10 (SHORT PAUSE/COURTE PAUSE)

11 D/CST. SEGUIN: Okay.

12 MS. JONES: Okay. Just two questions about
13 something that happened on February 20th, 2008.

14 The first thing I believe you have a
15 reference to at 15:00 hours. I just need an interpretation
16 of your notes.

17 Were you with Officer Dupuis when -- and did
18 you attend the Best Western Hotel with Officer Dupuis to
19 get the memo from Crown Attorney Hallett?

20 D/CST. SEGUIN: Yes.

21 MS. JONES: You were with him?

22 D/CST. SEGUIN: Yes.

23 MS. JONES: I understand there was also a
24 meeting on February 20th, 2001 between defence counsel,
25 Inspector Hall and Officer Dupuis, were you present also at

1 that particular meeting? There doesn't seem to be a
2 notation of that in your notes -- "The defence counsel ---"

3 D/CST. SEGUIN: Right.

4 MS. JONES: "--- Hall and Dupuis."

5 D/CST. SEGUIN: I don't recall a meeting
6 like that when there wasn't a Crown present.

7 MS. JONES: Okay. So it's not in your
8 notes. I'm just ---

9 D/CST. SEGUIN: Correct.

10 MS. JONES: --- clarifying you were not
11 present for that. Okay.

12 If we could please go back? Madam Clerk, I
13 apologize; it's the statement, Document 123037. It was
14 made an exhibit earlier; 123037. It was the statement I
15 started off with this morning -- not this morning, but
16 about 20 minutes ago.

17 THE COMMISSIONER: Are you talking about the
18 will say?

19 MS. JONES: I'm sorry. Have you got it
20 there? I'm sorry.

21 THE COMMISSIONER: What are you looking for
22 now?

23 MS. JONES: I'm looking at the wrong thing;
24 I'm sorry.

25 Could you please then go to Document 123037?

1 **THE COMMISSIONER:** Thank you. Two seven one
2 eight (2718) is Document 123037, which is a summary of
3 Detective Constable Steve Seguin's statement. Okay.

4 **--- EXHIBIT NO./PIÈCE NO. P-2718:**

5 (123037) - Summary of Steve Seguin Statement

6 **MS. JONES:** Just the last point, on the
7 behaviour of Crown Hallett from your perspective.

8 I just want to go to Bates page 5729, about
9 halfway down, and I believe these are your words:

10 "To say that Crown Hallett was being
11 unprofessional is an understatement. I
12 have never seen a Crown attorney become
13 so accusatory and unravelled. It
14 appeared as if her life was just
15 ruined. She actually commented on how
16 this would spread and it would take her
17 five years to clear her name."

18 Do you still stand by that assessment of
19 your opinion of that behaviour at that time?

20 **D/CST. SEGUIN:** Absolutely.

21 **MS. JONES:** Is there anything else you wish
22 to add on that particular point?

23 **D/CST. SEGUIN:** No.

24 **MS. JONES:** Now, we're going to move on to
25 another issue.

1 **THE COMMISSIONER:** Oh, no. No, no. No, no.

2 **MS. JONES:** Oh, I'm sorry.

3 **THE COMMISSIONER:** Let's go back. Okay.

4 So the trial has started, you're not very
5 happy with Ms. Hallett; you've got some concerns, right?

6 **D/CST. SEGUIN:** Yes.

7 **THE COMMISSIONER:** Okay. So the issue of
8 disclosure in Dunlop comes up.

9 **D/CST. SEGUIN:** Yes.

10 **THE COMMISSIONER:** All right. Can we go
11 through that as much as you remember of how it happened?
12 Okay. So the victim's mother is on the stand, and she
13 says, "Mr. Dunlop was talking to me." And defence says,
14 "Wait a minute here. Mr. Dunlop's involved in this?"

15 Then what happens, as far as you can
16 remember?

17 **D/CST. SEGUIN:** From there the defence makes
18 an issue about Dunlop's involvement and it should be all
19 disclosed.

20 **THE COMMISSIONER:** Right.

21 **D/CST. SEGUIN:** The information gets
22 disclosed, and ---

23 **THE COMMISSIONER:** The information is
24 Officer Dupuis goes back in his notes ---

25 **D/CST. SEGUIN:** Yes.

1 **THE COMMISSIONER:** --- finds a paragraph
2 that says that while he was there picking up ---

3 **MS. JONES:** Right.

4 **THE COMMISSIONER:** --- something, there's a
5 phone call from Dunlop?

6 **D/CST. SEGUIN:** Yes.

7 **THE COMMISSIONER:** Okay. So that gets
8 photocopied?

9 **D/CST. SEGUIN:** Right.

10 **THE COMMISSIONER:** What happens then?

11 **D/CST. SEGUIN:** I can go through it and I'm
12 just trying to put everything in my mind so I get the times
13 right. That document is disclosed.

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

15 **D/CST. SEGUIN:** Then we get into the
16 meeting ---

17 **THE COMMISSIONER:** Well, just a minute. The
18 defence gets up and says something about, "This is really
19 bad and it's wilful non-disclosure ---"

20 **D/CST. SEGUIN:** Yes.

21 **THE COMMISSIONER:** "--- by the police?"

22 **D/CST. SEGUIN:** Yes.

23 **THE COMMISSIONER:** Is that fair?

24 **D/CST. SEGUIN:** Initially they were pointing
25 the finger at us, yes.

1 **THE COMMISSIONER:** Right, okay. Okay, so
2 then what happened?

3 **D/CST. SEGUIN:** And then we get into the
4 meeting issue.

5 **THE COMMISSIONER:** And who was in the
6 meeting?

7 **D/CST. SEGUIN:** Crown Hallett; Crown Tier I
8 believe is there.

9 **THE COMMISSIONER:** Yes.

10 **D/CST. SEGUIN:** Myself, and Pat Hall.

11 **THE COMMISSIONER:** Okay. Is Officer
12 Smith -- no, Smith isn't ---

13 **D/CST. SEGUIN:** No.

14 **THE COMMISSIONER:** --- there yet. All
15 right. And the defence counsel?

16 **D/CST. SEGUIN:** Yes.

17 **THE COMMISSIONER:** All right. And that's
18 when you say that the defence starts pointing the fingers
19 again at you folks, and saying, "You should know
20 better ---"

21 **D/CST. SEGUIN:** Yes.

22 **THE COMMISSIONER:** "--- and you should have
23 disclosed this to us." Ms. Hallett says, "I knew nothing
24 about it"?

25 **D/CST. SEGUIN:** Yes, basically.

1 **THE COMMISSIONER:** Basically. And you walk
2 out and you go back, or you go -- I don't know, but you
3 find yourselves alone with your OPP officers and the Crown
4 Hallett, and is Tier there as well?

5 **D/CST. SEGUIN:** Yes, I believe she is. I'll
6 check my notes. I believe you're correct, though.

7 **THE COMMISSIONER:** So how are you feeling at
8 this time?

9 **D/CST. SEGUIN:** Yeah, the case is going
10 south.

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

12 **D/CST. SEGUIN:** And defence is pointing the
13 finger at the police for nondisclosure and that's not an
14 uncommon thing in the courts.

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

16 **D/CST. SEGUIN:** And the denial by Crown
17 Hallett knowing about it, and then afterwards, Pat Hall
18 pointing out that, "You did know about it."

19 **THE COMMISSIONER:** And okay, so that's in
20 the meeting that you're having just then?

21 **D/CST. SEGUIN:** Yes.

22 **THE COMMISSIONER:** And what does he say
23 about that?

24 **D/CST. SEGUIN:** I have notes here.

25 **THE COMMISSIONER:** Well, you can look at

1 your notes, but do you have any recollection?

2 D/CST. SEGUIN: Yes. I remember very clear
3 that he was unhappy with her that she had the material.

4 THE COMMISSIONER: Okay. And "the material"
5 you ---

6 D/CST. SEGUIN: Being the Dunlop will say.

7 THE COMMISSIONER: Okay. And in the will
8 say there's some reference to him speaking with this lady?

9 D/CST. SEGUIN: Yes.

10 THE COMMISSIONER: Okay.

11 D/CST. SEGUIN: Yes.

12 THE COMMISSIONER: Okay, and what does she
13 say to that?

14 D/CST. SEGUIN: Recollection? I can't tell
15 you. I believe there's something in my notes on that.

16 THE COMMISSIONER: M'hm, go ahead.

17 D/CST. SEGUIN: I'm sorry. Can I get the
18 date that we're talking about?

19 THE COMMISSIONER: February ---

20 D/CST. SEGUIN: We've been bouncing around
21 between dates, and I'm not sure which one ---

22 THE COMMISSIONER: No, no, I understand.
23 What's the date? February ---

24 MR. CARROLL: The 1st of ---

25 THE COMMISSIONER: I'm sorry?

1 **MR. CARROLL:** February 7th it would be the
2 [C16] testimony.

3 **THE COMMISSIONER:** All right. Let's go on.
4 So after you leave Hallett do you have a
5 discussion with Joe about all of this; Joe Dupuis?

6 **D/CST. SEGUIN:** At that time?

7 **THE COMMISSIONER:** Yes.

8 **D/CST. SEGUIN:** Oh, we did talk about it. I
9 don't know if it was there or afterwards ---

10 **THE COMMISSIONER:** No, no, but ---

11 **D/CST. SEGUIN:** --- at the office, but we
12 did speak about it, yes.

13 **THE COMMISSIONER:** Okay. So what were you
14 folks feeling? What ---

15 **D/CST. SEGUIN:** That we missed something.

16 **THE COMMISSIONER:** You missed something?
17 Okay.

18 **D/CST. SEGUIN:** Yes.

19 **THE COMMISSIONER:** And was there any little
20 gritting of teeth and saying, "Hallett left us out to dry
21 -- hung us out to dry?"

22 **D/CST. SEGUIN:** No. And this goes into the
23 wilful nondisclosure thing.

24 **THE COMMISSIONER:** Right.

25 **D/CST. SEGUIN:** No, I don't think that's the

1 case. I think the issue there was the finger-pointing.

2 **THE COMMISSIONER:** M'hm. Well, so she's ---

3 **D/CST. SEGUIN:** Yeah. I mean, initially the
4 police were getting targeted and she didn't have -- she
5 said she didn't know about it, and then afterwards Pat Hall
6 said, "You did know about it."

7 And I guess my issue there was that she
8 didn't acknowledge that before that it was the first she
9 knew about it.

10 **THE COMMISSIONER:** I'm sorry, say that
11 again.

12 **D/CST. SEGUIN:** When she said to defence
13 that it was the first that she knew about this ---

14 **THE COMMISSIONER:** Right.

15 **D/CST. SEGUIN:** --- that was the issue where
16 everything went south.

17 **THE COMMISSIONER:** Okay. So then the next
18 day Smith shows up?

19 **D/CST. SEGUIN:** I'm not sure.

20 **THE COMMISSIONER:** Well, Smith eventually
21 shows up?

22 **D/CST. SEGUIN:** Yes.

23 **THE COMMISSIONER:** All right, and are you
24 there that day when he's there?

25 **D/CST. SEGUIN:** I would be there, yes.

1 **THE COMMISSIONER:** Did you meet with Smith
2 and the Crown at any time?

3 **D/CST. SEGUIN:** Yes.

4 **THE COMMISSIONER:** When was that?

5 **D/CST. SEGUIN:** At some point during that
6 timeframe, and I think we're talking about the issue of him
7 going to visit defence.

8 **THE COMMISSIONER:** Yes.

9 **D/CST. SEGUIN:** Yes, I remember that I --
10 when he left to go see defence.

11 **THE COMMISSIONER:** Okay, so you were in a
12 room with the Crown or you were someplace with the Crown?

13 **D/CST. SEGUIN:** Somewhere, yes.

14 **THE COMMISSIONER:** Did you overhear the
15 conversation between Smith and Hallett?

16 **D/CST. SEGUIN:** Yes. I don't recall what
17 was said but that he was a witness for the defence and he
18 was their witness. And there was a conversation about him
19 meeting with them to find out what they wanted from him as
20 a witness.

21 **THE COMMISSIONER:** All right, so he's
22 informing Hallett of that?

23 **D/CST. SEGUIN:** Yes.

24 **THE COMMISSIONER:** And then he goes?

25 **D/CST. SEGUIN:** Yes.

1 **THE COMMISSIONER:** Do you go with him?

2 **D/CST. SEGUIN:** No.

3 **THE COMMISSIONER:** All right, who goes with
4 him?

5 **D/CST. SEGUIN:** I don't recall -- not the
6 Crowns.

7 **THE COMMISSIONER:** No.

8 **D/CST. SEGUIN:** I don't recall.

9 **THE COMMISSIONER:** Did Smith ever have any
10 conversation with you afterwards about this setup, not the
11 setup, how things unfolded?

12 **D/CST. SEGUIN:** I don't know if we ever
13 debriefed, if that's what you mean, or discussed it, no. I
14 don't recall that.

15 **THE COMMISSIONER:** Was there any discussion
16 about, "Well we're going to show her, we're going to give
17 these documents to the defence"?

18 **D/CST. SEGUIN:** No, no, not at all.

19 **THE COMMISSIONER:** M'hm, okay.

20 Ms. Jones?

21 **MS. JONES:** Thank you. We're now going to
22 move onto the issue of David Petepiece, thankfully someone
23 without a moniker. And I'll refer you to your notes. It's
24 Exhibit 2705, Document 733251. Exhibit 2705, Bates page
25 8471.

1 D/CST. SEGUIN: Did you say 8471?

2 MS. JONES: Yes. July 16th, 1998.

3 D/CST. SEGUIN: Yes.

4 MS. JONES: You can actually turn the page
5 to the next page because actually that's your contact, but
6 the Bates page refers to the date.

7 So if we look at Bates page 8472, it appears
8 that this was the date that you interviewed a person called
9 David Petepiece and he reported that sexual advances had
10 been made towards him by an unknown man who had identified
11 himself as an Anglican minister when Mr. Petepiece was
12 hospitalized at the age of ten years old in the '50s. Do
13 you recall that?

14 D/CST. SEGUIN: I didn't interview him. He
15 came with a prepared statement.

16 MS. JONES: True. Well, we'll go to that
17 statement actually. It's a late disclosure, 701118.

18 (SHORT PAUSE/COURTE PAUSE)

19 MS. JONES: Okay.

20 THE COMMISSIONER: Just a second. So we
21 don't have the paper form, all right.

22 So Exhibit number -- Mr. Manderville.

23 MR. MANDERVILLE: I'm not objecting, sir.

24 MS. JONES: All right.

25 THE COMMISSIONER: Just a second, do we---

1 **MS. JONES:** That's fine. I'm not actually
2 going to the substance of it in any event, but ---

3 **THE COMMISSIONER:** I know, but as the
4 guardian of the exhibits ---

5 **MS. JONES:** Yes.

6 **THE COMMISSIONER:** --- you know we have to
7 make sure that we deal with this properly. So if we don't
8 have a hard copy -- Madam Clerk, is that correct; we do not
9 have one? What's the next exhibit number?

10 **THE REGISTRAR:** Two seven one nine (2719).

11 **THE COMMISSIONER:** Two seven one nine
12 (2719).

13 **MR. KOZLOFF:** Is this not already an
14 exhibit?

15 **MS. JONES:** Oh, it states Exhibit 323.

16 **MR. KOZLOFF:** I'm just trying to assist the
17 guardian.

18 **THE COMMISSIONER:** Thank you.

19 **MS. JONES:** Thank you very much.

20 **THE COMMISSIONER:** So are we saying this is
21 a previous exhibit now; what exhibit is it?

22 **THE REGISTRAR:** Three two three (323).

23 **THE COMMISSIONER:** Three two three (323),
24 okay, which I have here.

25 **D/CST. SEGUIN:** Thank you.

1 **MS. JONES:** So was this the document that
2 Mr. Petepiece gave you then when you met with him on July
3 16th?

4 **D/CST. SEGUIN:** I believe so, yes. Actually
5 it is; a copy of it.

6 **MS. JONES:** And at that particular point, he
7 had made this disclosure to you, he actually even if we go
8 to your notes, he said that he had -- he made understood
9 that he had heard about Project Truth and wanted to come
10 forward and make this disclosure and that's why he had
11 contacted you?

12 **D/CST. SEGUIN:** Yes.

13 **MS. JONES:** And he also gave a name as a
14 person that was a possible witness when you met with him
15 and I understand that you did actually do follow-up with
16 that particular person but there wasn't anything that was
17 of use to you on that issue?

18 **D/CST. SEGUIN:** Actually it was of a lot of
19 use. It was -- it showed that -- I was looking for
20 corroboration and that person did not corroborate his story
21 at all.

22 **MS. JONES:** All right, so it was useful for
23 that then? It wasn't useful to Mr. Petepiece; that's what
24 I was meaning perhaps?

25 **D/CST. SEGUIN:** That's fair.

1 **MS. JONES:** Okay.

2 **THE COMMISSIONER:** You were referring to the
3 patient in the next bed?

4 **D/CST. SEGUIN:** Yes.

5 **THE COMMISSIONER:** Okay.

6 **D/CST. SEGUIN:** Yes.

7 **MS. JONES:** So the other mystery though was
8 still who this possible person was that had done this. I
9 didn't find anything in your notes to reveal that you had
10 done any investigation to find out if you could determine
11 who this mystery person was. Do you recall doing any
12 follow-up after you had spoken to this other potential
13 witness?

14 **D/CST. SEGUIN:** Any other follow-up after
15 this witness that we're talking about in the bed beside
16 him?

17 **MS. JONES:** Yes.

18 **D/CST. SEGUIN:** There was some research done
19 on the identity of the person who he explains has something
20 -- some interaction at the hospital with this Anglican
21 priest, if I can use that.

22 **MS. JONES:** Well, he's alleging the
23 perpetrator was an Anglican minister?

24 **D/CST. SEGUIN:** Yes.

25 **MS. JONES:** And he was hospitalized? Yes.

1 What sort of follow-up did you do? As I said, I couldn't
2 find anything in your notes to show that there had been --
3 it's those footsteps?

4 **MR. KOZLOFF:** To keep the record pristine,
5 he was alleging that the person identified himself as an
6 Anglican minister.

7 **THE COMMISSIONER:** Fair enough.

8 **MS. JONES:** All right, was there any follow-
9 up investigation to determine the person that Mr. Petepiece
10 had identified?

11 **D/CST. SEGUIN:** Well, there was some
12 research done but I can't recall what it was and I don't
13 believe it was done by myself. Don Genier did a lot of the
14 church research, including the brothers, when we had Alfred
15 stuff that we were looking at too.

16 And I seem to recall something but I don't
17 know what it is or where it could be.

18 **MS. JONES:** Just by way of interest, when
19 someone comes in like Mr. Petepiece came in, do you open a
20 file up? How does that work, so that the right hand knows
21 what the left hand is doing?

22 **D/CST. SEGUIN:** It would be another
23 complaint that has come forward and it would be discussed
24 in the office.

25 **MS. JONES:** But is there an actual physical

1 file opened?

2 D/CST. SEGUIN: Yes, there is a file folder
3 placed in our filing cabinets. We had suspect folders. We
4 had witness folders, victim folders, that sort of thing,
5 yes.

6 MS. JONES: So in this particular case, as
7 you've described, if the information is given to you --
8 presumably this is your case; Mr. Petepiece is someone
9 you're supposed to look after?

10 D/CST. SEGUIN: Yes.

11 MS. JONES: How do you find out if there's
12 been any research done on it by someone else?

13 D/CST. SEGUIN: Discussion in the office.

14 MS. JONES: Okay, so there is no formal
15 check and balance system, a paper trail as it were?

16 D/CST. SEGUIN: Yeah, actually that would be
17 a good thing if there was -- now I'm talking about back
18 then, 1997, '98.

19 If there was a sort of sheet that you could
20 continually update with what has been done. We had
21 assignment registers that we kept track of the initial
22 assignment, and in some cases there was follow-up work done
23 in there but, for the most part, they were put into Crown
24 briefs, that information.

25 MS. JONES: But from your perspective, after

1 you had talked to this witness that did not corroborate Mr.
2 Petepiece's version, from your perspective that was the end
3 of your involvement in it?

4 **D/CST. SEGUIN:** I would say essentially,
5 yes, but to expand upon that as well, Mr. Commissioner, in
6 this investigation, I dealt with 74 victims. That's the
7 amount of people that I had contact with. And I certainly
8 don't want this to come across as I'm downplaying Mr.
9 Petepiece's account of what occurred.

10 At this time, we were dealing with the
11 disclosure issues because there were a number of charges
12 had been laid. Certainly, the *Stinchcombe* was coming into
13 play and we had to make sure we -- made sure we took care
14 of all the obligations there with the disclosure requests.

15 Seventy-three (73) of the victims, when I
16 say 74, had physical sexual contact that occurred to them,
17 and Mr. Petepiece wasn't one of those 73, sir. And again
18 I'm not trying to downplay what occurred to him -- and I
19 didn't follow up after that.

20 I explained to him too, as you will probably
21 get to -- and I can probably start that off -- that I said
22 I was going to get back to him, and the idea behind that
23 was to provide him with some disclosure -- sorry, some
24 closure, and I didn't do that. I know you're going to go
25 further with that.

1 **MS. JONES:** Okay.

2 So the next time that you have contact with
3 Mr. Petepiece appears to be on July 16th, 2001. And if you
4 want to go to your notes, that's Document 733264, Exhibit
5 2710.

6 **D/CST. SEGUIN:** I believe there's a contact
7 in January of '99 as well.

8 **MS. JONES:** All right. Do you have the
9 exact date?

10 **D/CST. SEGUIN:** I have it noted as 18th of
11 January, '99.

12 **(SHORT PAUSE/COURTE PAUSE)**

13 **D/CST. SEGUIN:** Yes.

14 **MS. JONES:** Yes, that's Document 733260,
15 Exhibit 2706, and it's Bates page 8701.

16 And 11:38 that day, it states:

17 "Call from David Petepiece, who stated
18 that he provided a statement in July
19 and I was supposed to get back to him
20 in two weeks. I never did [and] I
21 asked where I could reach him. He gave
22 a phone number."

23 And you called later that day, you got the
24 voicemail:

25 "Left a message I'd be back later this

1 afternoon or he could call me tomorrow
2 morning."

3 And that was the only other contact ---

4 **D/CST. SEGUIN:** Yes.

5 **MS. JONES:** --- at that point? Okay.

6 So now if we go to Document 733264, Exhibit
7 2710, Bates page 592. Thank you.

8 July 16th, 2001 and 1400 hours. You're
9 meeting with David Petepiece. He had contacted you and
10 he's not happy about the situation. And do you recall that
11 meeting ---

12 **D/CST. SEGUIN:** Yes.

13 **MS. JONES:** --- as well? And do you recall
14 that -- it states in your notes -- do you recall that
15 Detective Dupuis was with you as well at that time?

16 **D/CST. SEGUIN:** Yes.

17 **MS. JONES:** Now, I'd say Mr. Petepiece was
18 not very happy. In fact, he was contemplating a formal
19 complaint about the situation at that time?

20 **D/CST. SEGUIN:** Yes.

21 **MS. JONES:** And I believe he said he was
22 meeting with you to give you an opportunity to explain
23 yourselves before he filed any such complaint?

24 **D/CST. SEGUIN:** That sounds correct, but I
25 don't recall exactly.

1 **MS. JONES:** All right.

2 **THE COMMISSIONER:** Well, in your notes on
3 the 16th of July, it says:

4 "...come to meet with us prior to
5 sending in his letter of complaint to
6 OCOPS."

7 **D/CST. SEGUIN:** Yes.

8 **THE COMMISSIONER:** All right?

9 **D/CST. SEGUIN:** Thank you.

10 **THE COMMISSIONER:** So there you go.

11 **MS. JONES:** Thank you.

12 And you also stated at 14:58 -- you answered
13 some of his questions and advised him of the fact that
14 there was no offence, criminally, "for what he did during
15 that time". I suppose it's what happened to him during
16 that time is more ---

17 **D/CST. SEGUIN:** Yeah, I'll wait 'til -- I
18 can't see the bottom of the page.

19 **THE COMMISSIONER:** Scroll down there.

20 **MS. JONES:** Scroll down please, Madam Clerk.

21 **D/CST. SEGUIN:** Yes, and this is the second
22 time that that was explained to him.

23 **MS. JONES:** Right. But you were the one
24 that was explaining the law or what you understood the law
25 to be at that time?

1 **D/CST. SEGUIN:** Yes. Actually go back to
2 July 16th, I believe it was, '98 when we first met.

3 **MS. JONES:** M'hm.

4 **D/CST. SEGUIN:** I explained to Mr. Petepiece
5 at that time that what occurred to him would be an offence
6 today's date, invitation to sexual touching. Back in that
7 time, there was no offence for that when this occurred to
8 him. There were offences like -- I could go through rape,
9 incest ---

10 **THE COMMISSIONER:** Indecent assault.

11 **D/CST. SEGUIN:** Indecent assault,
12 intercourse with the feeble-minded, that sort of stuff.

13 But there was nothing at that time for
14 invitation, and I did explain it to him and in my mind it
15 was very clear. It turns out that I was incorrect; it
16 wasn't clear in his mind.

17 **MS. JONES:** Was there any discussion with
18 you -- and I suppose Dupuis was there at the same time --
19 but was there any discussion with Mr. Petepiece about
20 whether or not this fell into the Project Truth mandate?

21 **D/CST. SEGUIN:** By myself, I don't believe
22 so.

23 **MS. JONES:** That was not an issue for you,
24 certainly?

25 **D/CST. SEGUIN:** No. I believe that was in a

1 letter afterwards.

2 MS. JONES: Right, but that -- as I say,
3 that was not something you were thinking of or mindful of?

4 D/CST. SEGUIN: No, not at all.

5 MS. JONES: You were concerned solely with
6 that was not an offence back in the fifties and ---

7 D/CST. SEGUIN: Yes.

8 MS. JONES: Okay.

9 Now, at this particular meeting -- we've
10 heard from Mr. Petepiece. He's testified here at the
11 Inquiry and, in his words, he felt quite intimidated during
12 this meeting, specifically by Officer Dupuis.

13 Did you have any opinion as to that?

14 MR. CARROLL: I think in fairness, rather
15 than characterizing how the witness felt, she should, if
16 she's going to make reference to that, put the whole
17 transcript to this witness so that he knows what was said,
18 including the retraction of the rather strong comments he
19 made.

20 MS. JONES: What a good idea. Volume 92,
21 please?

22 THE COMMISSIONER: And we'll do that after
23 the break.

24 MS. JONES: Okay. Thanks.

25 THE REGISTRAR: Order; all rise. À l'ordre;

1 veuillez vous lever.

2 This hearing will resume at 11:25 a.m.

3 --- Upon recessing at 11:07 a.m./

4 L'audience est suspendue à 11h07

5 --- Upon resuming at 11:27 a.m./

6 L'audience est reprise à 11h26

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

9 This hearing is now resumed. Please be
10 seated. Veuillez vous asseoir.

11 **D/CST. STEVE SEGUIN, Resumed/Sous le même serment:**

12 --- **EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN-CHEF PAR**

13 **MS. JONES (cont'd/suite):**

14 **THE COMMISSIONER:** Thank you.

15 All right, so we're looking at a transcript,
16 are we?

17 **MS. JONES:** Yes, at Volume 92, and this is
18 the evidence that Mr. Petepiece said he gave on the 8th of
19 February, 2007.

20 **THE COMMISSIONER:** What page?

21 **MS. JONES:** And I'm looking at page number
22 46.

23 **D/CST. SEGUIN:** Yes.

24 **MS. JONES:** And approximately line 12,
25 Mr. Petepiece was describing -- I believe he was actually

1 describing Officer Dupuis, although he uses the word "he".
2 But in any event:

3 "He made it a point to sit where he
4 could sort of stare at me. He wrote
5 down every word I said. It was almost
6 like he was taking dictation. I could
7 almost feel his presence, sort of in
8 trying to intimidate me."

9 And on the next reference -- I just want to
10 take you, please, to page 135 and this is a cross-
11 examination by Mr. Carroll, and I'm looking at line 13
12 starting there:

13 "Mr. Carroll: Okay and when that --
14 was the meeting essentially conducted
15 more by Dupuis than by Seguin? Is that
16 a fair statement?

17 Mr. Petepiece: No, no, Dupuis was the
18 stenographer.

19 Mr. Carroll: So he really didn't say
20 very much. It was Seguin saying the
21 things we talked about?

22 Mr. Petepiece: He was the muscle. Mr.

23 Carroll: Excuse me?

24 Mr. Petepiece: He was the muscle, you
25 know."

1 And then Mr. Carroll does -- he gets a
2 little excited I guess.

3 "Just a minute. Just a minute. What
4 do you mean by that?

5 Mr. Petepiece: Well, I've already
6 explained earlier and testified earlier
7 that the second person in the meeting,
8 who I'd originally believed and now
9 accepted wasn't Inspector Hall, was
10 doing his very best to intimidate and
11 bully me, not by words but by body
12 language, by looks. So I characterized
13 that as being the muscle in the
14 meeting. You may take exception to
15 that. That's my characterization of
16 it."

17 And so Mr. Carroll goes on to look at the
18 dimensions of the room and where the furniture was, et
19 cetera.

20 If we could go to page 137, line 12:

21 "Mr. Petepiece: Would it help if I
22 said that I have a great deal of
23 respect for the young officers. I have
24 a great deal of respect for Seguin. I
25 don't think he conducted himself

1 inappropriately. Dupuis: My
2 impression, I've already relayed to
3 you.
4 Mr. Carroll: When you use a term like
5 'muscle' then I feel it's my
6 responsibility to my client to
7 determine the factual basis for that.
8 Mr. Petepiece: Well, I withdraw that
9 remark."

10 **THE COMMISSIONER:** So he withdraws the
11 muscle remark.

12 **MS. JONES:** So it would appear that still
13 according to Mr. Petepiece, it appears he felt quite
14 intimidated during that meeting. Would you -- are you able
15 to confirm whether you were able to read Mr. Petepiece's
16 emotions during that time? Did you have any consideration
17 of his demeanour?

18 **D/CST. SEGUIN:** I don't remember that at
19 all.

20 **THE COMMISSIONER:** You don't remember ---

21 **D/CST. SEGUIN:** I know what -- I don't
22 remember that ---

23 **THE COMMISSIONER:** Meeting?

24 **D/CST. SEGUIN:** No, I remember the meeting.
25 I don't remember that -- I didn't get an impression from

1 Mr. Petepiece of that, sir.

2 **THE COMMISSIONER:** Okay.

3 **MS. JONES:** Now, if we could please go to
4 Document 701117, Exhibit 325.

5 **(SHORT PAUSE/COURTE PAUSE)**

6 **MS. JONES:** And this is a letter that was
7 written from Mr. Petepiece to OPP and ---

8 **THE COMMISSIONER:** Do we have a hard copy,
9 Madam Clerk? Oh, 325; sorry.

10 **MS. JONES:** Exhibit 325.

11 **THE COMMISSIONER:** Yeah.

12 **MS. JONES:** In this particular letter, it
13 would appear that Mr. Petepiece had done a bit of the
14 investigation himself and he comes to certain conclusions
15 based on his own research. Is that a fair description?

16 **D/CST. SEGUIN:** I'm just reading the letter
17 now. Yes, I see that part in the middle of the letter.

18 **MS. JONES:** Did you actually receive this
19 letter?

20 **D/CST. SEGUIN:** No.

21 **MS. JONES:** And I wonder if we could please
22 go then to Exhibit 326 which should be the next tab for
23 you. It's Document 701116. And this is the letter dated
24 19th of July, 2001 from Inspector -- Detective Inspector
25 Hall to Mr. Petepiece.

1 And, essentially, Officer Hall is explaining
2 to Mr. Petepiece that, amongst other things, this complaint
3 did not fall into the jurisdiction of OPP Project Truth
4 because the suspect was not a Roman Catholic priest or a
5 prominent person.

6 Do you recall having such a discussion with
7 Inspector Hall?

8 **D/CST. SEGUIN:** That it wasn't -- didn't fit
9 the mandate?

10 **MS. JONES:** Yes.

11 **D/CST. SEGUIN:** No.

12 **MS. JONES:** When ---

13 **D/CST. SEGUIN:** And, well, I can explain the
14 mandate to you, but go ahead; sorry.

15 **MS. JONES:** When you had met with Mr.
16 Petepiece on July 16th, 2001, am I correct in assuming --
17 because this letter's written -- that you would have
18 discussed the matter with Inspector Hall between that time
19 and the writing of this letter?

20 **D/CST. SEGUIN:** Yes.

21 **MS. JONES:** And you're stating that you and
22 he had never discussed, during that time, the mandate of
23 Project Truth and what Mr. Paul says in his letter?

24 **D/CST. SEGUIN:** No, this is his words.

25 **MS. JONES:** On the second page of the

1 letter, it also states in the paragraph that starts:

2 "In your particular case, I regret that
3 you were not completely made aware of
4 our actions or lack of continuation on
5 the investigation. This may have been
6 due to miscommunication between
7 Detective Constable Seguin and myself."

8 Can you explain that from your perspective
9 what possible miscommunications would Inspector Hall be
10 referring to there?

11 **D/CST. SEGUIN:** Well, the only thing I can
12 think of is maybe what was done in the case, but I don't
13 blame Inspector Hall for this at all. This is my mistake.

14 **MS. JONES:** But do you know what he'd be
15 referring to there; a miscommunication?

16 **D/CST. SEGUIN:** Maybe on the investigation
17 status of it or -- that's the only thing I can interpret
18 that as.

19 **MS. JONES:** Way back when, when Mr.
20 Petepiece first made his complaint, had you had discussions
21 with Inspector Hall about it?

22 **D/CST. SEGUIN:** Yes, actually with every
23 complainant there was discussion in the office.

24 **MS. JONES:** Could this have related to any
25 prior discussion possibly?

1 D/CST. SEGUIN: I don't believe so.

2 MS. JONES: There's also a suggestion as
3 well by Inspector Hall that Mr. Petepiece contact the CPS
4 for any further investigation.

5 D/CST. SEGUIN: Yes, because it had been
6 turned over, I believe, in 2000; his complaint for further
7 follow-up.

8 MS. JONES: And had you had discussions with
9 Mr. Petepiece about his feelings, perhaps, about Cornwall
10 Police, whether they'd be able to appropriately deal with a
11 situation like this?

12 D/CST. SEGUIN: I don't believe I did.

13 MS. JONES: Thank you.

14 We're going to move on now to the issues
15 surrounding Malcolm MacDonald and I understand that you
16 were the lead investigator in the investigation of Malcolm
17 MacDonald and when you took on this investigation, you were
18 aware quite early on in the file that Mr. MacDonald had
19 been -- had pleaded guilty to a charge of obstruct justice
20 with regards to the cash settlement with David Silmsner and
21 the Diocese and that had happened in 1995 ---

22 D/CST. SEGUIN: I'm aware of the ---

23 MS. JONES: --- so you were aware of that?
24 Okay.

25 D/CST. SEGUIN: --- occurrence.

1 **MS. JONES:** And you, I believe, had the
2 first indication of a sexual impropriety on the part of
3 Malcolm MacDonald when you spoke to a person, C-5, on
4 September 30th, 1997?

5 **D/CST. SEGUIN:** I'm -- I'm aware of this
6 person. If I could see the first contact, I don't have
7 that in front of me. Are you talking the date because I'm
8 not sure about the date?

9 **MS. JONES:** I don't have an issue so much
10 with the date if it's -- how about if we -- on certain
11 dates where it's kind of not an issue ---

12 **D/CST. SEGUIN:** Yes.

13 **MS. JONES:** --- if you could maybe take my
14 word, unless there's an objection from your counsel that
15 I've got the date wrong.

16 So, according to my calculation here, on
17 September 30th you met with C-5 and according to what he
18 said to you, that there was a witness that could
19 corroborate the allegations. And on February 3rd, 1998, you
20 interviewed C-10.

21 **D/CST. SEGUIN:** Thank you.

22 **MS. JONES:** And can you stay there, Madam
23 Clerk, I've got one more.

24 On December 17, 1998, you interviewed C-21?

25 **D/CST. SEGUIN:** Thank you.

1 **MS. JONES:** So those were the three
2 allegations and the three alleged victims of Malcolm
3 MacDonald in your investigation. And he was arrested and
4 charged on March 11, 1999 with three counts of indecent
5 assault with respect to C-5 and C-10?

6 **D/CST. SEGUIN:** Yes, and that makes sense,
7 yes.

8 **MS. JONES:** Okay. I'm wondering what
9 happened to the allegations with C-21 with regards to
10 Malcolm MacDonald?

11 **D/CST. SEGUIN:** That brief was submitted to
12 the Crown attorney for review.

13 **MS. JONES:** So that -- just to get it clear,
14 that was not your decision?

15 **D/CST. SEGUIN:** Oh, no.

16 **MS. JONES:** Okay. Now, the initial
17 allegations, therefore, if they date initially from C-5,
18 which is September 30, 1997, Malcolm MacDonald is not
19 arrested until March 11, 1999. Now, the last complainant
20 that you have, which is C-10 -- I'm sorry, which is C-21,
21 is December 17, 1998, but the other two are obviously much
22 sooner than that, that being September 30, '97, and
23 February 3, '98.

24 And I'm just wondering if you can explain
25 why there was a long delay between the initial complaint of

1 C-5 and C-10 and the eventual arrest of Malcolm MacDonald
2 on March 11, 1999?

3 D/CST. SEGUIN: And do you have the date
4 that it was sent off for review?

5 MS. JONES: I don't have that date handy.

6 D/CST. SEGUIN: That would certainly help me
7 answer the dates.

8 MS. JONES: Was this a case that you asked
9 for a Crown opinion on?

10 D/CST. SEGUIN: Yes.

11 MS. JONES: Okay. So you would have had to
12 wait, in part time, anyway for the Crown opinion?

13 D/CST. SEGUIN: Yes.

14 MS. JONES: All right.

15 Now, there is still 18 months between the
16 time that the first allegation is made and the eventual
17 arrest. Did you make any efforts to see whether or not
18 Malcolm MacDonald had any access to children during that
19 time period?

20 D/CST. SEGUIN: I drove by his house a
21 number of times, I can tell you that. There were a lot of
22 interviews done in relation to Mr. MacDonald.

23 THE COMMISSIONER: Malcolm MacDonald?

24 D/CST. SEGUIN: Mr. Malcolm MacDonald, yes.
25 Actually, the -- I think the briefs were fairly large in

1 his case and I -- I don't recall.

2 **MS. JONES:** Okay. Mr. Malcolm MacDonald
3 died of natural causes on December 23, 1999, and the Crown
4 withdrew the charges shortly thereafter. Now, if we look
5 at the date of C-5's allegation when it's first reported on
6 September 30, 1997 -- I just want that as an anchor date --
7 apparently on September 11, 1997, you had driven past
8 Malcolm MacDonald's home and recorded three licence plate
9 numbers. And I'm just wondering what would be the reason
10 for you to have done that around September 11, 1997, when,
11 in fact, C-5 doesn't make his allegation until September
12 30th?

13 **D/CST. SEGUIN:** Well, he was named -- Mr.
14 MacDonald -- Mr. Malcolm MacDonald was named in the Fantino
15 brief or the Dunlop binders, so he was somebody of
16 interest, I guess, to us even right from the beginning.

17 **MS. JONES:** So when you first were looking
18 at these files then in, I believe it was May, June and
19 July, 1997, that is a name that was known to you from that
20 experience then?

21 **D/CST. SEGUIN:** Yes. Yes.

22 **MS. JONES:** All right.

23 And that would explain why you talked to the
24 secretary on September 19, 1997, which again predates the
25 complaint made by C-5?

1 D/CST. SEGUIN: Yes. Now, we have to go
2 back. I believe there was -- I'd really like to look at
3 the Fantino brief. There may have been allegations -- I
4 know there were a number of allegations in there and I'd
5 really like to see what was in there to be able to comment
6 on if there was a contact before that as far as the
7 complainant.

8 MS. JONES: All right.

9 Well, how about we leave that then. I just
10 wanted to know if -- that you confirmed that you were aware
11 that there were problems possibly with Malcolm MacDonald
12 because of the Fantino brief?

13 D/CST. SEGUIN: Yes.

14 MS. JONES: To explain the dates and such.
15 Okay.

16 Now, we're going to move on to another
17 topic. If I could just have a moment, please?

18 (SHORT PAUSE/COURTE PAUSE)

19 MS. JONES: I'm sorry. I always like to
20 check with Mr. Lee on certain issues.

21 I was wondering if we could please go to
22 Document 7 -- I'm sorry -- 722117. It's a late disclosure
23 document.

24 (SHORT PAUSE/COURTE PAUSE)

25 MS. JONES: Mr. Commissioner, before you say

1 this person's name that's listed up at the top, this person
2 has been discussed and the fact that she's actually
3 associated with someone else that's affiliated with the
4 Inquiry, but her name's never actually been said. I was
5 wondering if we could have a moniker assigned to her at
6 this time?

7 **THE COMMISSIONER:** Wait a minute now. You
8 know, we're getting a little bit ---

9 **MS. JONES:** Moniker heavy?

10 **THE COMMISSIONER:** No, no, the number of
11 monikers doesn't bother me.

12 **MS. JONES:** Okay.

13 **THE COMMISSIONER:** It's -- we're getting a
14 little soft on why we should put a publication ban on the
15 name. Now, Mr. ---

16 **MS. JONES:** Well, this person has alleged
17 actually being ---

18 **MR. MANDERVILLE:** I think, Mr. Commissioner,
19 the horse has already left the barn. Her name has been
20 mentioned a number of times in the context of a particular
21 previous witness.

22 **THE COMMISSIONER:** Mr. Lee, do you take a
23 position on this thing?

24 **MR. LEE:** May I have just one moment with
25 Ms. Jones?

1 **THE COMMISSIONER:** Sure.

2 **(SHORT PAUSE/COURTE PAUSE)**

3 **MR. LEE:** Mr. Commissioner, just from my
4 brief discussion with Ms. Jones, unbeknownst to me there
5 may be, as I understand it, an allegation from this person
6 of having been a victim of abuse. I didn't know that at
7 the time and I suppose we certainly haven't discussed this
8 person in that context ever publicly at this Inquiry.

9 And so if Ms. Jones is correct that there is
10 an allegation, that may change the story slightly in the
11 sense that I'm not sure that we should be outing this
12 person as an alleged victim of abuse.

13 And apparently there's another issue with
14 this person's children also being alleged victims, and
15 perhaps if that's going to be part of the narrative,
16 there's going to be an issue with having some concerns
17 about their identity as well.

18 **THE COMMISSIONER:** Right. Okay. So I'm
19 going to give this lady a moniker in order to protect the
20 children. So ---

21 **THE REGISTRAR:** C-99.

22 **THE COMMISSIONER:** C-99 will be the person
23 who is named in Exhibit 2719, Document 722117, which is the
24 first name on the -- below the word statement. Okay.

25 **MS. JONES:** Sorry, Madam Clerk, what was the

1 Exhibit number again?

2 THE REGISTRAR: Exhibit 2719.

3 MS. JONES: Thank you.

4 --- EXHIBIT NO./PIÈCE NO. P-2719:

5 (722117) - Statement of C-99 dated 11 Dec 96

6 MS. JONES: This particular statement
7 apparently comes out of the Fantino brief. I don't know if
8 you're able to catalogue it to that particular time. It's,
9 as I say, dated 11th December 1996. Could there be
10 publication ban, by the way, on that. I don't know if it's
11 automatic. Thank you.

12 Do you recall reading a statement when you
13 were reading the Fantino brief or you've since become aware
14 of it?

15 D/CST. SEGUIN: Yes, if it was in there, I
16 would have it at some point, yes.

17 MS. JONES: All right. The issue with this
18 particular statement is that -- it would appear that she's
19 talking about sexual allegations with regards to her
20 children. Can you see that in the first page?

21 D/CST. SEGUIN: Are we talking about the
22 second-last paragraph?

23 MS. JONES: That's correct.

24 D/CST. SEGUIN: Yes.

25 MS. JONES: Okay. And she was asking them -

1 - her children were doing sexual acts, and she asked who
2 had shown them that, and she actually said a name down
3 there, which I don't think that we need to actually say, at
4 this particular point.

5 D/CST. SEGUIN: Okay.

6 MS. JONES: And she also reported that there
7 were three more victims, two boys and one girl. She stated
8 as well that she...

9 "...contacted Cornwall Police Force,
10 and Bob Trottier. A male police
11 officer with red hair came over to
12 investigate. He told me that it would
13 be tough to prove sexual assault, given
14 the age of the victims. I found this
15 strange, as the girl that was assaulted
16 was 12 years old."

17 I can also verify her children, at the time,
18 were eight and five, just to clarify that:

19 "The police officer told me that it
20 would not be worthwhile to proceed
21 with this. He seemed to have a
22 problem with even approaching the
23 suspect in the case. I was not
24 pleased and in fact very upset. I
25 then went to Malcolm MacDonald to

1 get an outside legal opinion as to
2 how to proceed with this matter.
3 Malcolm made me feel like it was me
4 who caused this whole problem."

5 A little further down the paragraph:

6 "Malcolm never once asked me anything
7 about the suspect in the case. He
8 gave me nothing but negative
9 responses and in fact told me to
10 back off."

11 Do you see that?

12 **D/CST. SEGUIN:** Yes.

13 **MS. JONES:** Next paragraph:

14 "I then went to see Ken Seguin about
15 this matter. He also said that it
16 was not worthwhile proceeding and it
17 would be hard to prove. I often
18 wonder if Ken tried anything on my
19 boys when they stayed overnight at
20 Ken's house in Summerstown, as they
21 had stayed over several times. I
22 have often wanted to approach them on
23 this matter, but cannot seem to find
24 the right time. This has been very
25 hard on me and bothers me to this

1 day."

2 D/CST. SEGUIN: All right.

3 MS. JONES: Okay? So, in that particular
4 letter, I think you'd agree that there were quite serious
5 allegations that were coming out, as presented by C-99?

6 D/CST. SEGUIN: Yes.

7 MS. JONES: Is there a reason why this
8 person would not be contacted when you went through the
9 Fantino brief?

10 D/CST. SEGUIN: No, I don't know.

11 MS. JONES: Now, if we go to another
12 document, please, also late disclosure, 712037?

13 THE COMMISSIONER: The soft shoes of
14 Mr. Neville.

15 MR. NEVILLE: Good morning, sir.

16 Perhaps this is a matter for cross-
17 examination, but Detective Seguin took a statement from
18 this person. The witness was asked why he didn't contact
19 this person, and she was interviewed.

20 MS. JONES: Just be patient. So 712037?

21 THE COMMISSIONER: Thank you. Exhibit 2720,
22 which will have a publication ban, is Document 712037,
23 interview ---

24 MS. JONES: Just a moment -- before you say
25 the name ---

1 **THE COMMISSIONER:** I wasn't going to say the
2 name.

3 **MS. JONES:** Thank you.

4 **THE COMMISSIONER:** How is he related?

5 **MS. JONES:** Brother.

6 **THE COMMISSIONER:** Brother of C-99?

7 **MS. JONES:** Yes, that's right.

8 **THE COMMISSIONER:** So, interview report of
9 the brother of C-99, taken on 23rd of September 1997, by
10 Constables Seguin and Dupuis.

11 **---EXHIBIT NO./PIÈCE NO P-2720:**

12 (712037) - Interview Report of C-99's
13 brother dated 23 Sep 97

14 **MS. JONES:** So it would appear that 23rd of
15 September 1997, you interviewed the brother of C-99?

16 **D/CST. SEGUIN:** Yes.

17 **MS. JONES:** All right. Just a moment,
18 please.

19 **(SHORT PAUSE/COURTE PAUSE)**

20 **D/CST. SEGUIN:** This person was also in the
21 Fantino brief.

22 **MS. JONES:** Yes, that's right. If you could
23 just -- okay, he provided you this statement, and it was
24 written down there. I just need to now go to the notes of
25 Officer Dupuis for that same day, and during that

1 particular interview. So if you keep that one aside there?

2 That's Exhibit 2609, Bates pages 1141, 1142,
3 and it's Document 733615. So these appear as a ---

4 **D/CST. SEGUIN:** Yes.

5 **MS. JONES:** Okay. These appear to be the
6 notes taken of Officer Dupuis, during the interview
7 actually of the brother, C-99?

8 **D/CST. SEGUIN:** Actually, if you could give
9 me the Bates page ---

10 **MS. JONES:** Sure.

11 **D/CST. SEGUIN:** --- because I'm not there.

12 **MS. JONES:** One one four one (1141), sir.

13 **D/CST. SEGUIN:** Thank you.

14 **MS. JONES:** And if we look at the entry, I
15 think it's 0945, and it shows that you and Officer Dupuis
16 are taking this particular statement. I take it he's
17 writing contemporaneous notes about it.

18 I'm interested, mainly, in the entry that
19 starts off, "He stated" -- that's not the right -- I'm
20 sorry, Madam Clerk; 1141, 7131141. Thank you.

21 There's a bullet point:

22 "He stated that both of C-99's boys
23 have been assaulted by a person by
24 the name of Lalonde from around
25 Cornwall."

1 Do you see that?

2 D/CST. SEGUIN: Yes.

3 MS. JONES: Okay. That actually does not
4 appear in the statement of C-99's brother, that's why I
5 wanted to have the two of them here, just to confirm that,
6 but it would appear that Officer Dupuis' notes seem to
7 reflect this particular name; that's where that name
8 appears. I don't actually find it anywhere else but there,
9 with regards to C-99's brother.

10 D/CST. SEGUIN: Yes.

11 MS. JONES: Okay. So, at this particular
12 point -- we've already talked about it in your evidence
13 yesterday -- you are aware of at least one Lalonde that's
14 involved with the Project Truth investigation?

15 D/CST. SEGUIN: Yes.

16 MS. JONES: And there doesn't seem to be any
17 follow-up to that or any clarification, shall we say, of C-
18 99's brother as to the name, or even asking him if he knows
19 that's the people that were named in C-99's statement that
20 we referred to earlier? Would you agree with me on that?

21 D/CST. SEGUIN: Yeah, I do agree.

22 MS. JONES: Now, if we could please go to
23 Document 712035?

24 THE COMMISSIONER: Thank you. Publication
25 ban on this document, which is 2721, Document 712035, which

1 is an interview report of C-99, taken on April 7th, 1998.
2 Present were Detective Constables Seguin and Dupuis.

3 ---EXHIBIT NO./PIÈCE NO P-2721:

4 (712035) - Interview Report of C-99 dated 07
5 Apr 98

6 MS. JONES: So this is the statement of C-99
7 that is taken by yourself and Officer Dupuis the 8th of
8 April 1998.

9 Now, if her initial statement, which was
10 2719, was in the Fantino brief, presumably you would have
11 been aware of that sometime between May and June, say,
12 1997. You then had her brother coming in.

13 MS. JONES: If your initial statement, which
14 was 2719, was in the Fantino brief, presumably you would
15 have been aware of that sometime between May and June, say,
16 1997. You then had her brother coming in in September 1997
17 and yet she's actually not interviewed by yourselves until
18 the 7th of April, 1998.

19 Are you able to explain the delay?

20 D/CST. SEGUIN: Other than she was just --
21 I'm not trying to explain the delay. I know she was one of
22 numerous people that we had to interview.

23 MS. JONES: But you'd agree with me that in
24 her statement that she initially gave that was found in the
25 Fantino brief, she's making quite serious allegations about

1 possible sexual assaults on her children.

2 She's named possible perpetrators. Her
3 brother has named someone with a surname of interest to
4 Project Truth, and yet she's not interviewed until quite
5 some period of time later.

6 **D/CST. SEGUIN:** I don't know if that's the
7 person with -- of interest to Project Truth. We don't know
8 if that's the same person.

9 **MS. JONES:** Because you didn't investigate
10 that?

11 **D/CST. SEGUIN:** Yes, that's correct.

12 **MS. JONES:** So if this isn't a person that
13 should be interviewed by Project Truth with an immediacy to
14 it -- can you understand that there's several ingredients
15 here that would possibly flag her as someone that should
16 have been interviewed on an "as soon as possible" basis?
17 Would you agree with that?

18 **MR. KOZLOFF:** The supposition of that
19 question, in my respectful submission, has no basis in
20 fact.

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

22 **MR. KOZLOFF:** The woman is reporting that
23 her children were apparently assaulted. The matter was
24 reported to the Cornwall Police years before.

25 **THE COMMISSIONER:** Right.

1 **MR. KOZLOFF:** There's a mandate for Project
2 Truth.

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

4 **MR. KOZLOFF:** The statement is contained in
5 the brief. The officers are following up on numerous leads
6 from the brief in relation to their mandate. And, with
7 respect, what my friend is suggesting is that there was a
8 global imperative to these officers investigating every
9 possible allegation of either an offence or an offence
10 which had already been reported but wasn't followed up
11 appropriately in Cornwall. And that's not the mandate.

12 So the premise of the question, in my
13 respectful submission, to this officer is an unfair one.

14 **THE COMMISSIONER:** Well, let's change it
15 around a little bit. Regardless if it's the mandate, we
16 heard that the Dunlop or Fantino brief is our mandate.

17 **MR. KOZLOFF:** Right.

18 **THE COMMISSIONER:** In that mandate -- in
19 that file there is this letter.

20 **MR. KOZLOFF:** Yes.

21 **THE COMMISSIONER:** Okay. So first of all,
22 they have to determine whether or not it's part of their
23 mandate.

24 **MR. KOZLOFF:** Right.

25 **THE COMMISSIONER:** So -- I mean, the

1 question may have been a little difficult but bottom line
2 is they are vested with the Fantino brief. So if they read
3 something in there, I would suspect that they have to
4 assess it, they have to determine where it stands, and how
5 they're going to do it.

6 So I think the question of -- "You got the
7 Fantino brief in spring of '97"?

8 **MR. KOZLOFF:** Yes.

9 **THE COMMISSIONER:** "Why did it take you
10 about a year to interview this person"?

11 Isn't that a fair question?

12 **MR. KOZLOFF:** Yes, that's a fair question.

13 **THE COMMISSIONER:** Okay.

14 **MR. KOZLOFF:** It's the interjected premises
15 that my friend puts in her questions ---

16 **THE COMMISSIONER:** We'll clean them up.

17 **MR. KOZLOFF:** --- that suggests that
18 Constable Seguin and his associates in Project Truth had a
19 mandate to investigate the world.

20 **THE COMMISSIONER:** No. Then I disagree with
21 you.

22 **MR. KOZLOFF:** Well, the world as it's
23 contained in the Fantino brief.

24 **THE COMMISSIONER:** You agree that anything
25 in the Fantino brief, they would have to look at?

1 **MR. KOZLOFF:** They would have to follow-up
2 on the contents of the Fantino brief.

3 **THE COMMISSIONER:** Right.

4 **MR. KOZLOFF:** And they are.

5 **THE COMMISSIONER:** A year later.

6 **MR. KOZLOFF:** Yes.

7 **THE COMMISSIONER:** So the question is, why?

8 **MR. KOZLOFF:** Okay, fine.

9 **MS. JONES:** So why did it take that period
10 of time then, Officer Seguin?

11 **D/CST. SEGUIN:** I don't know. I've looked
12 at the context of the statement itself too, and it seems to
13 me that I'm asking about this group in Summerstown that
14 were supposedly doing things. There's allegations of that
15 and on the second page, Bates page 5115, there's an answer
16 about a third of the way down. She talked about her kids
17 being sexually molested and the Cornwall Police
18 investigated it.

19 I didn't -- at that time, I didn't put two
20 and two together. I didn't recall the initial part, but
21 here we have somebody, this lady, C-99, saying that her
22 kids were sexually molested and Cornwall Police
23 investigated it.

24 I took that as this was a complete thing.
25 Now, as far as the time, I can't answer that.

1 **MS. JONES:** So is it fair to say then that -
2 - to put your own words -- you hadn't put two and two
3 together? Is it possible that you had not thought about
4 this particular statement?

5 **D/CST. SEGUIN:** I think you're exactly
6 right.

7 **MS. JONES:** Was there ever any research done
8 as to whether or not the "Lalonde" that was mentioned in
9 the interview with the brother of C-99 was, in fact, Marcel
10 Lalonde?

11 **D/CST. SEGUIN:** I don't recall if I did any
12 of that. I don't believe I did.

13 **MS. JONES:** You'd agree that if it had
14 turned out to be someone in any way of interest to Project
15 Truth, a person ongoing -- on an ongoing investigation,
16 that would certainly have fallen within the mandate of
17 Project Truth?

18 **D/CST. SEGUIN:** Well, the determination
19 would be up to Inspector Smith I guess at that time.

20 **MS. JONES:** Well, maybe my question wasn't
21 very clear.

22 If you had another alleged victim of a
23 person already being looked at by Project Truth, clearly
24 that would have fallen under the mandate?

25 **D/CST. SEGUIN:** Yeah, but Mr. Lalonde was

1 not looked at by Project Truth. It was Cornwall Police
2 investigating that.

3 **MS. JONES:** You did not -- just to be clear,
4 though, you did not contact Cornwall Police to see if, in
5 fact, the investigation had gone on as described by C-99?

6 **D/CST. SEGUIN:** Myself personally, I don't
7 believe I did.

8 **MS. JONES:** Thank you.

9 We're going to move on now to look very
10 briefly at Father Charles MacDonald, and I understand that
11 you participated in 34 interviews with respect to the
12 investigation of Father Charles MacDonald. Is that right?

13 **D/CST. SEGUIN:** I'm not sure of the number;
14 quite a few.

15 **MS. JONES:** You were not the lead
16 investigator though on that?

17 **D/CST. SEGUIN:** No.

18 **MS. JONES:** If I could please go to Document
19 712963.

20 (SHORT PAUSE/COURTE PAUSE)

21 **D/CST. SEGUIN:** Thank you.

22 **MS. JONES:** This person will require a
23 moniker as well, please?

24 **THE COMMISSIONER:** Why is that?

25 **MS. JONES:** He's claiming that he was a

1 victim of sexual abuse.

2 **THE COMMISSIONER:** All right.

3 Exhibit 2722 will be -- is Document 712963,
4 which is an interview report of C-100 taken at the 1st of
5 September, 1998 by Detective Constable Seguin.

6 **MS. JONES:** I ask for a publication ban,
7 please.

8 **THE COMMISSIONER:** Publication ban as well.

9 **--- EXHIBIT NO./PIÈCE NO. P-2722:**

10 (712963) - Interview Report of C-100 dated
11 September 1, 1998

12 **MS. JONES:** So this is an interview that you
13 actually conducted yourself, by yourself, September 1st,
14 1998, and I want to refer you to the second page actually
15 of this, which is the handwritten version. It has a bit
16 more detail on it.

17 The allegations alleged by this particular
18 individual are being levelled against Father Charles
19 MacDonald?

20 **D/CST. SEGUIN:** Yes.

21 **MS. JONES:** And if I could down about two-
22 thirds of the way down the handwritten version, it starts
23 with the words, "Received a greeting card".

24 **D/CST. SEGUIN:** Yes.

25 **MS. JONES:** Do you see that? It states:

1 "Received a greeting card letter from
2 Father Charles dated 31st December,
3 1997. Letter stated that Father
4 Charles was sorry about what he did to
5 [C-100] and did not mean to hurt him in
6 any way."

7 Do you see that?

8 **D/CST. SEGUIN:** Yes.

9 **MS. JONES:** So is this your handwriting,
10 sir?

11 **D/CST. SEGUIN:** Yes, it is.

12 **MS. JONES:** And I take it then you're
13 writing this down as C-100 is speaking?

14 **D/CST. SEGUIN:** I don't remember. Like I
15 notice on the top it says, "Informal Interview." This is a
16 person that wasn't really keen on ---

17 **THE COMMISSIONER:** Look at the second page,
18 sir.

19 **D/CST. SEGUIN:** Yes.

20 **THE COMMISSIONER:** Okay.

21 **D/CST. SEGUIN:** The first line, it says,
22 "Informal Interview."

23 **THE COMMISSIONER:** Right.

24 **D/CST. SEGUIN:** So I'm just not sure how
25 this was taken in that light. I remember this fellow very

1 well.

2 **MS. JONES:** I'm not actually looking at
3 anything surrounding the circumstances. I'm just
4 specifically looking at that aspect of it.

5 But as I say, this was your handwriting and
6 you were writing it as you were going along?

7 **D/CST. SEGUIN:** I don't recall that, if it
8 was there or afterwards, because I don't believe he signed
9 it. This is -- it's not like a normal statement.

10 **MS. JONES:** But this was -- okay. But this
11 was done by yourself either at the time or shortly
12 thereafter?

13 **D/CST. SEGUIN:** Yes.

14 **MS. JONES:** All right.

15 And to the best of your recollection, that
16 was accurate as to what ---

17 **D/CST. SEGUIN:** Yes.

18 **MS. JONES:** --- C-100 was telling you?

19 **D/CST. SEGUIN:** Yes.

20 **MS. JONES:** Okay. Now, later on you have
21 contact with a person that is known here as C-4.

22 **MR. KOZLOFF:** Just before we leave that,
23 perhaps my friend would like the -- let the officer look at
24 his notes for that day which contain a very full record of
25 the interview with -- or the meeting with Mr. -- with C-

1 100.

2 THE COMMISSIONER: Do you know where that
3 is, sir?

4 MR. KOZLOFF: I know where it is in the
5 typewritten notes, sir, which is an unofficial copy, but
6 the date is the ---

7 THE COMMISSIONER: That's the date of the
8 interview?

9 MR. KOZLOFF: Yes.

10 THE COMMISSIONER: So the 1st of September
11 1998. So can we go down into your notes, which probably --
12 2710?

13 MS. JONES: No, 2705.

14 THE COMMISSIONER: Two seven zero five
15 (2705).

16 (SHORT PAUSE/COURTE PAUSE)

17 THE COMMISSIONER: The first one to find it,
18 Mr. Kozloff, buys him lunch.

19 MS. JONES: Eight five four one (8541).

20 THE COMMISSIONER: Eight five four one
21 (8541).

22 MS. JONES: And 8442 continues.

23 THE COMMISSIONER: Okay. Is that where we
24 are? Yes. M'hm.

25 MS. JONES: So if we go to the reference

1 about the greeting card, it's on Bates page 8543.

2 D/CST. SEGUIN: Yes.

3 MS. JONES: "Showed me a greeting card,
4 letter dated 31st December and
5 signed C.F.R. MacDonald. It states
6 he's sorry if he hurt [C-100] in any
7 way and he basically apologized for
8 what he did to [C-100], not stating
9 what it was. [C-100] would only let me
10 read the card and would not allow me to
11 copy or keep it because he didn't want
12 to be involved."

13 D/CST. SEGUIN: Yes.

14 MS. JONES: Okay. So if we leave that now,
15 I just would like to go, please, to a transcript, Volume
16 109.

17 (SHORT PAUSE/COURTE PAUSE)

18 THE COMMISSIONER: Do we have it? Yes,
19 okay. What page, please?

20 MS. JONES: Page 38.

21 THE COMMISSIONER: Thank you.

22 D/CST. SEGUIN: Thank you.

23 MS. JONES: Okay. This is the testimony of
24 C-4 here at the Inquiry, and I just want to get the dates
25 correct. I think this is the easiest way, actually, to get

1 that. It would appear that on January 18, 1999, Detective
2 Constable Dupuis attended at C-4's residence and that is
3 when apparently he became aware that there was a letter as
4 well written by Father Charles MacDonald to C-4. And if
5 you want to see the reference to the letter, it's actually
6 on the next page at line 15, where C-4 says:

7 "The letter that I got I'd handed to
8 Constable Dupuis at that time."

9 So it appears that he gave the letter that
10 he had on January 18th, 1999. It was not at the time he
11 gave his statement which was actually earlier.

12 D/CST. SEGUIN: Yeah, I'll agree with that
13 because of the ---

14 MS. JONES: There was an issue because the
15 letter had gone to his brother ---

16 D/CST. SEGUIN: Yes.

17 MS. JONES: --- and then -- okay.

18 So you had this similar situation happening
19 with C-100 on September 1, 1998, and a pretty consistent
20 situation that happened then with C-4 with regards to a
21 letter, the same -- similar sort of words, a similar date
22 and from the same person obviously?

23 D/CST. SEGUIN: Yes.

24 MS. JONES: And I'm wondering if there was
25 any notice between the two of you? For instance, you're

1 the one who took the statement from C-100 and had that
2 knowledge. And it appears Dupuis took the letter from C-4.
3 Was there any discussion between you about the similarity
4 of those two events?

5 D/CST. SEGUIN: Yes. Well, we would have
6 both known about this. We would have talked about it.
7 This is pretty dramatic.

8 MS. JONES: Pardon me?

9 D/CST. SEGUIN: It's pretty dramatic.

10 MS. JONES: Yeah. Did you inform anybody
11 about that?

12 D/CST. SEGUIN: As to who?

13 MS. JONES: As to ---

14 D/CST. SEGUIN: This all would have been ---

15 MS. JONES: There's the fact that there was
16 a coincidence here of these two letters?

17 D/CST. SEGUIN: Well, all this information
18 would have been put together in the Crown brief by Joe
19 Dupuis.

20 MS. JONES: Okay. So you did, therefore,
21 advise Officer Dupuis about it, about C-100's statement?

22 D/CST. SEGUIN: Yes, and I believe we all
23 knew. At that time we all knew what was going on in
24 everybody's cases pretty well.

25 MS. JONES: All right.

1 I'd like to touch briefly on the prosecution
2 of Keith Jodoin. The initial allegation that you had
3 against Keith Jodoin happened as the result of a statement
4 that you received on the 29th of September 1997 and there
5 was also another interview done on March 22nd, 1999. I'm
6 not sure; I don't think he has a moniker. I'd just like to
7 double check and recheck.

8 The second interview was with Marc Carriere.
9 He has testified here, and that interview was March 22nd,
10 1999?

11 **THE COMMISSIONER:** So it's the two
12 interviews with the same person, Mr. Carriere?

13 **MS. JONES:** No.

14 **THE COMMISSIONER:** Is that what you're
15 saying?

16 **MS. JONES:** No.

17 **THE COMMISSIONER:** No?

18 **MS. JONES:** No, there was another person on
19 the 29th of September 1997.

20 **THE COMMISSIONER:** And who would that person
21 be?

22 **MS. JONES:** Pardon me?

23 **THE COMMISSIONER:** Do you know who the first
24 person was? Does he have a moniker?

25 **MS. JONES:** He hasn't had a moniker yet.

1 Just a moment please. If we can go to Document 713433.

2 (SHORT PAUSE/COURTE PAUSE)

3 THE COMMISSIONER: Is this the person?

4 MS. JONES: It is.

5 D/CST. SEGUIN: Thank you.

6 MS. JONES: I would ask for a moniker,
7 please.

8 THE COMMISSIONER: Mr. Lee, do you represent
9 this person?

10 MR. LEE: No, sir.

11 THE COMMISSIONER: All right.

12 So Exhibit 2723 is Document Number 713433,
13 interview report of -- we're going to call this C-101.
14 Date of interview, the 29th of September, '97. Present were
15 Detective Constables Seguin and Dupuis.

16 ---EXHIBIT NO./PIÈCE NO P-2723:

17 (713433)- Interview Report of C-101
18 dated 20 Sep 97

19 MS. JONES: So in this particular statement
20 this person's making an allegation against Keith Jodoin.
21 Do you recall that?

22 D/CST. SEGUIN: I recall the other person
23 being made an allegation against.

24 THE COMMISSIONER: On page 792 is where I
25 think we begin with Mr. Jodoin.

1 **MS. JONES:** I believe he also made an
2 allegation of someone else that had worked there, at the
3 same work place, as well?

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

5 **(SHORT PAUSE/COURTE PAUSE)**

6 **MS. JONES:** Perhaps I should be more clear.
7 There's an allegation made against Mr. Jodoin by this
8 person by virtue of the fact it's happening at the same
9 work place.

10 **D/CST. SEGUIN:** Well, I don't see an
11 allegation against Mr. Jodoin.

12 **MS. JONES:** Yeah, I think I misspoke in
13 that, but it's by an employee of Mr. Jodoin ---

14 **D/CST. SEGUIN:** That makes ---

15 **MS. JONES:** --- at the work place of
16 Mr. Jodoin.

17 **D/CST. SEGUIN:** Yes, I know the person.

18 **MS. JONES:** Okay. I misspoke earlier; my
19 apologies.

20 So this particular person is certainly
21 making a fairly serious allegation as to what had happened
22 to him, and then we have a Marc Carriere who makes his
23 determination of March 22nd, 1999.

24 The "work place," shall we say, of Keith
25 Jodoin, is basically involved or highlighted in both of

1 these areas, and I'm wondering if there was an effort made
2 on your part to look at this particular work place to see
3 if there were problems, and children having access to
4 people that worked there, specifically the people that were
5 named here by those two complainants?

6 **D/CST. SEGUIN:** Well, that was a parish
7 centre and I think there'd be a lot of children around
8 there.

9 Mr. C-101, his allegation against that
10 person was turned over to Cornwall police, and that person
11 was deceased.

12 **MS. JONES:** Okay.

13 **D/CST. SEGUIN:** And I believe Joe
14 Dupuis -- or I wasn't sure -- oh, it could be Don Genier.
15 I'm not sure who handled the Keith Jodoin complaint.

16 **MS. JONES:** All right.

17 So we have Marc Carriere coming forward
18 though on March 22nd, 1999, and Mr. Jodoin was charged on
19 August 24th, 2000 with one count of sexual assault with
20 respect to Mr. Carriere, and these charges were eventually
21 withdrawn on November 20th, 2000.

22 And I'm wondering who made the decision
23 about withdrawing those charges? Would that been you
24 involved in that or just ---

25 **D/CST. SEGUIN:** No, I wasn't involved in

1 that case.

2 MS. JONES: All right.

3 Would you have been consulted at all to
4 determine what should happen to these charges?

5 D/CST. SEGUIN: No.

6 MS. JONES: And what about the role of
7 informing the victim of the -- or the complainant, ahead of
8 time, of this decision being made; are you involved in that
9 at all?

10 D/CST. SEGUIN: I don't know if I was
11 involved in it. It would be the responsibility of the
12 investigating officer.

13 MS. JONES: Are you -- were you not the lead
14 investigator on the Jodoin matter?

15 D/CST. SEGUIN: No.

16 MS. JONES: Oh, you weren't?

17 D/CST. SEGUIN: No.

18 MS. JONES: But that would have been the job
19 of the lead investigator?

20 D/CST. SEGUIN: Yes.

21 MS. JONES: I wonder if now is good time to
22 stop. I'm going to move on to a new area. I won't have
23 that much longer to go, unless you want me to go until
24 1:00.

25 THE COMMISSIONER: No, no, we're breaking at

1 12:30, or now, if you want. We'll come back at 1:00. I
2 thought people could get some fruit or a light lunch, in
3 any event.

4 **MS. JONES:** Okay, thank you.

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

7 This hearing will resume at 1:00 p.m.

8 ---Upon adjourning at 12:24 p.m./

9 L'audience est adjournée à 12h24

10 ---Upon resuming at 1:04 p.m./

11 L'audience est reprise à 13h04

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

14 This hearing is now resumed. Please be
15 seated. Veuillez vous asseoir.

16 **THE COMMISSIONER:** Thank you.

17 **STEVE SEGUIN, Resumed/sous le même serment:**

18 ---EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN-CHEF PAR

19 **MS. JONES (Cont'd/Suite):**

20 **MS. JONES:** Not too much longer, Officer
21 Seguin.

22 Could we please go to document 712362?

23 **THE COMMISSIONER:** Thank you.

24 **MS. JONES:** This person has a moniker of C-
25 66.

1 **THE COMMISSIONER:** Exhibit 2724 is Document
2 712362, which is a videotaped interview report -- of C-66,
3 you say?

4 **MS. JONES:** Yes.

5 **THE COMMISSIONER:** Taken on the 22nd day
6 of May, 1998 by Detective Constable Genier.

7 **---EXHIBIT NO./PIÈCE NO P-2724:**

8 (712362) - Interview
9 Report of C-66 dated 22 May 98

10 **MS. JONES:** Now, there's one other person, I
11 believe too that was interviewed with respect to the
12 prosecution of Bernard Sauv , and this was the first
13 statement in time though, May 22nd, 1998. Mr. Sauv  was
14 charged on July 29th, 1999 with six counts with regards to
15 C-66, and one other person. That means there were 15
16 months between the arrest and the charging date.

17 And I'm wondering what efforts you made to
18 see whether or not Mr. Sauv  had access to children during
19 that time period please?

20 **D/CST. SEGUIN:** Is this the moniker you just
21 spoke about, this person?

22 **MS. JONES:** C-66, yes.

23 **D/CST. SEGUIN:** Okay. This investigation
24 was handled by Don Genier.

25 **MS. JONES:** So you were not involved at all

1 in any of that?

2 D/CST. SEGUIN: I obtained some statements
3 that they used in the Crown briefs.

4 MS. JONES: So you don't know then if any
5 efforts were made is basically what your response is?

6 D/CST. SEGUIN: I don't know.

7 MS. JONES: Okay. And ---

8 THE COMMISSIONER: Well, no, just a second
9 now. Just a second.

10 I understand that Detective Constable Genier
11 did this, and I don't think he's well enough to come and
12 testify, and so we're asking you these questions.

13 So if you people are exchanging information
14 all the time, as you say you are, was one of the points
15 that you would rally around at times was what threat or
16 menace do these accused, or soon to -- well, not soon to be
17 accused, but later on to be accused -- pose for the
18 community? Was that a point that was a fixture and
19 regularly reviewed on a regular basis?

20 D/CST. SEGUIN: Actually, I think that was
21 the most important part; we wanted to ensure that these
22 guys weren't still in a position to do this to more kids.

23 THE COMMISSIONER: Right.

24 D/CST. SEGUIN: Now, what was done -- I
25 would have known at the time what was being done; now I

1 can't answer that.

2 **THE COMMISSIONER:** Okay. But are you saying
3 that it was your policy -- your team's policy that once you
4 had an accused in your sights that one of the things you
5 would do is investigate to see where he was now and whether
6 he posed a threat?

7 **D/CST. SEGUIN:** Oh, absolutely, sir.

8 **THE COMMISSIONER:** Okay.

9 **MS. JONES:** Thank you.

10 The last topic that I'm actually going to be
11 concerned with is issues surrounding Classical College.
12 And I'd like to first refer you to your own note, which is
13 Document 733258, Exhibit 2694, Bates page 8218. So why
14 don't I just find my version.

15 This person does not have a moniker, Mr.
16 Commissioner.

17 **THE COMMISSIONER:** Which person?

18 **MS. JONES:** The person is listed on 8218 at,
19 I think it's:

20 "0911 Contacted. Received information
21 via Comm Centre of possible victim..."

22 And then the person's name is given. And he
23 does make a complaint of sexual assault.

24 **THE COMMISSIONER:** All right.

25 So there will be a moniker 102 -- 102 for

1 the person who is mentioned in Officer Seguin's notes dated
2 June 28th, 1997 at 0900 hours. Then name is right beside a
3 phone number. That person will be 102.

4 **MS. JONES:** Thank you.

5 So it would appear on the 20th of July in
6 1997 you had a conversation with C-102.

7 **D/CST. SEGUIN:** Yes.

8 **MS. JONES:** And he was making allegations
9 that when he went to Classical College in Cornwall that he
10 was sexually assaulted there and didn't give, I don't
11 believe, names at that particular point; that may have come
12 later.

13 **D/CST. SEGUIN:** If I can get a -- pull down
14 the screen a bit, please.

15 **MS. JONES:** Oh, I'm sorry. But actually in
16 8219 -- I'm sorry, Madam Clerk.

17 **D/CST. SEGUIN:** Yes.

18 **MS. JONES:** As I said, it's not naming names
19 at that particular point, but the two points of interest;
20 first of all, was that the first time that you had heard of
21 anything to do with the institution called Classical
22 College?

23 **D/CST. SEGUIN:** I don't know.

24 **MS. JONES:** If you joined Project Truth in
25 May 1997, do you recall going through the Fantino brief,

1 for example, and seeing any references to Classical
2 College?

3 **D/CST. SEGUIN:** I can recall a clipboard for
4 the Classical College, but I don't know if it was developed
5 after this date or not. I can't be sure.

6 **MS. JONES:** Okay.
7 But certainly, by this date, you're hearing
8 about it?

9 **D/CST. SEGUIN:** Yes.

10 **MS. JONES:** And C-102 also gave you another
11 name of somebody that could be a potential person of
12 interest, shall we say, for you to talk to about possible
13 other allegations?

14 **D/CST. SEGUIN:** Yes.

15 **MS. JONES:** I don't see anywhere in your
16 notes following up that there was actually any attempt at
17 contacting this person. Do you recall that?

18 **D/CST. SEGUIN:** He was deceased.

19 **MS. JONES:** Okay, that would answer that
20 question.

21 **THE COMMISSIONER:** That would be a good one.

22 **MS. JONES:** Now, you spoke to C-102 again,
23 it would appear from your notes, on August 8th, 1997, but
24 the actual interview with this person didn't take place
25 until November 4th, 1997. Are you able to comment as to why

1 there was a delay on that particular issue? Can you
2 recall?

3 **D/CST. SEGUIN:** I had monthly contact with
4 that person.

5 **MS. JONES:** Okay.

6 **D/CST. SEGUIN:** So every month, leading up
7 to that, I spoke with him. And it was -- we had to set up,
8 basically, a road trip to do a number of interviews in
9 Western Ontario.

10 **MS. JONES:** Now, if we could please go to
11 your same police notes and please go to Bates page 8288
12 [sic]. The date would be August 6th, 1997.

13 Mr. Commissioner, I'd be looking for a
14 moniker on another person. It's a person that was spoken
15 to at 11:33 and this person was also alleging a sexual
16 assault had occurred.

17 **THE COMMISSIONER:** I don't see it.

18 **MS. JONES:** "At 11:33 contacted above
19 number and spoke with..."

20 **THE COMMISSIONER:** Madam Clerk, are we on
21 the right page?

22 **THE REGISTRAR:** I'm sorry.

23 **MS. JONES:** I've got August 6; 8277. Have I
24 given the wrong Bates page? I'm sorry; it's 228. I
25 thought -- I thought I said that; 8228. I think that's

1 right. Thank you. Yeah, "11:33: Contacted above number
2 and spoke with..." and then the name appears there after.

3 **THE COMMISSIONER:** It's not on the list?

4 **MS. JONES:** I don't -- I did not see that.

5 **THE COMMISSIONER:** No. All right, so it's -
6 - C-103 is the moniker we're going to give to the person
7 who appears in Officer Seguin's notes. Can you give me the
8 Bates page number again just ---

9 **MS. JONES:** Bates pages 7128228.

10 **THE COMMISSIONER:** All right; and his name
11 appears on the 11:33 notation. So C-103.

12 **MS. JONES:** Thank you very much.

13 Now again, you had a -- you had a contact
14 with this person on August 6, 1997, and this person has
15 also said that he was an attendant at Classical College and
16 he's also alleging that there was sexual misconduct
17 effected upon him as well.

18 **D/CST. SEGUIN:** That's correct.

19 **MS. JONES:** Do you recall having that
20 conversation on that date?

21 **D/CST. SEGUIN:** Yes, that's correct. If I
22 could, Mr. Commissioner, on the same note we're talking
23 about the Classical College, Don Genier looked after a
24 group of people involving the Classical College and -- but
25 I'll do my best because I had dealings with several of

1 these people and -- well, when we get to the people; I'll
2 explain. Thank you.

3 **MS. JONES:** Now, if we look at Bates page
4 8229, you had stated you advised him that you would be in
5 touch in the next couple of weeks to arrange an interview.
6 Do you see that at the top of the page?

7 **D/CST. SEGUIN:** Yeah.

8 **MS. JONES:** All right.

9 If we could please, then, go to Bates page
10 8231 at 11:50, there's another contact with C-103.

11 **D/CST. SEGUIN:** Which date was that? I
12 don't see the top of the page.

13 **MS. JONES:** That's August 8th, 1997.

14 **D/CST. SEGUIN:** Thank you.

15 **MS. JONES:** So it's two days later actually.
16 And apparently, according to this one, you just left a
17 message that you'd contact in the future.

18 Now, the next document I'd like to take you
19 to is Document 712078.

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

21 **THE COMMISSIONER:** Thank you. Exhibit 2725
22 is Document Number 712078; audio taped interview report of
23 C-103 done on the 2nd of November 1998. Present were Deputy
24 Constables Seguin and Genier.

25 --- **EXHIBIT NO./PIÈCE No. 2725:**

1 (712078) - Interview Report of C-103 dated
2 02 Nov 98

3 **MS. JONES:** Thank you.

4 Now, the date of this interview is 2nd of
5 November, 1998, and the first contact you had with this
6 person was August 6, 1997 so it seems about 15 months or so
7 after the first point of contact. Are you able to explain
8 why there was such a delay in getting to this person?

9 **D/CST. SEGUIN:** This fellow, I do remember
10 him fairly well. There were some other contacts or at
11 least attempted contacts in there as well prior to this so
12 it's -- there was September '97, October '97, October '98
13 prior to the November interview.

14 This fellow did not have the phone. He
15 lived approximately half-an-hour or more away from his
16 mother's place and I recall having to leave messages for
17 him there and wait for a call back. And in his case, as
18 well as the first person you mentioned before, C-102, the
19 accused persons were deceased. I don't know if that has
20 come out yet. And -- anyways, that's -- that's the other
21 contacts that were in there.

22 **MS. JONES:** All right. And I'd like to
23 refer you, please, to -- I'm sorry, yes, this particular
24 person, C-103, he actually mentions five other possible
25 witnesses. I can refer you to that part of his statement

1 at 5271 and then 5278.

2 (SHORT PAUSE/COURT PAUSE)

3 MS. JONES: Five-two-seven-one, there's one
4 name of the same exhibit, of this current exhibit?

5 D/CST. SEGUIN: I have it.

6 MS. JONES: There's one name on 5271 and
7 there's several names on 5278. Are you aware of any
8 follow-up investigation that was done on these particular
9 names?

10 D/CST. SEGUIN: Yes, there -- there was
11 follow-up. Actually, the one town that they mention up in
12 Northern Ontario, I believe it's mentioned in two spots.

13 MS. JONES: Corbeil?

14 D/CST. SEGUIN: The top of page 272 and the
15 bottom of 278. I recall going up there on another, I
16 guess, another road trip where we interviewed people up
17 that way.

18 MS. JONES: Was this your person to look
19 after or was it Officer Genier's?

20 D/CST. SEGUIN: The person that -- Don was
21 looking after the Classique College material, but the
22 contact with the person was mine.

23 MS. JONES: So you did adequate follow-up
24 then on the names listed on Bates page 5278?

25 D/CST. SEGUIN: I don't recall what follow-

1 up was done, but if this -- I don't know if it's this case.
2 We had a difficult time, a very difficult time finding
3 witnesses, Mr. Commissioner, at times. There were a lot of
4 people that came from all over the country. You know, the
5 Classique College was a -- in that case in particular, I
6 remember Don talking about how difficult it was to find
7 people.

8 And I'm -- of course, I'm just talking off
9 the cuff here and I don't know if it's in relation to these
10 people, but it was very difficult finding some of these
11 people, particularly with the Classique College. I don't
12 know if I interviewed them or I located them or not.

13 **MS. JONES:** If I could have Document 712775.

14 **THE COMMISSIONER:** So if you knew the
15 suspect was deceased, why would you follow up with everyone
16 else?

17 **D/CST. SEGUIN:** If we were following up it's
18 because we didn't know at that time, sir.

19 **THE COMMISSIONER:** Didn't know that he was
20 dead?

21 **D/CST. SEGUIN:** Yes. Once we found out that
22 a person was dead ---

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

24 **D/CST. SEGUIN:** --- the only follow-up would
25 be with the victim to let him know that.

1 **THE COMMISSIONER:** Okay.

2 But what about the issue of -- about a clan
3 or anything like that? Would you follow up even though the
4 person was dead to see if other victims could connect him
5 to other perpetrators?

6 **D/CST. SEGUIN:** I'd have to say no. Again,
7 we -- I think you've heard it before, deceased people we
8 don't investigate. And as far as investigating the clan of
9 pedophiles, it was based on the information in the Dunlop
10 binders.

11 **THE COMMISSIONER:** Okay. Thank you.

12 **D/CST. SEGUIN:** Now, I'm not -- and I don't
13 want to be held to that exactly as well because if --

14 **THE COMMISSIONER:** You're not going to be --
15 -

16 **D/CST. SEGUIN:** -- there were -- sorry? If
17 there was a clan of pedophiles, it would have been
18 investigated.

19 **THE COMMISSIONER:** Okay.

20 **D/CST. SEGUIN:** And located ---

21 **THE COMMISSIONER:** How would you know?

22 **D/CST. SEGUIN:** Well, if we found any --
23 those kind of connections that are alleged ---

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

25 **D/CST. SEGUIN:** --- certainly it's not going

1 to go uninvestigated.

2 **THE COMMISSIONER:** Exhibit 2726 is Document
3 Number 712775.

4 **---EXHIBIT NO./PIÉCE NO. P-2726:**

5 Handwritten Notes of C-104 dated April 7,
6 1999

7 **MS. JONES:** This person will also require a
8 moniker, Mr. Commissioner.

9 **THE COMMISSIONER:** All right. So ---

10 **MS. JONES:** As he's alleging sexual
11 assaults.

12 **THE COMMISSIONER:** I think he's wearing
13 softer shoes today.

14 **MR. KOZLOFF:** Because she -- she's been
15 hearing footsteps.

16 **THE COMMISSIONER:** Yes.

17 **MR. KOZLOFF:** It's an old hockey expression,
18 Ms. Jones.

19 I think the record should reflect, sir, that
20 with respect to C-102, that allegation was 47 years old.

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

22 **MR. KOZLOFF:** And with respect to 103, the
23 allegation was 34 years old.

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

25 **MR. KOZLOFF:** That might explain difficulty

1 locating witnesses and I think it puts in context perhaps
2 the questions that are being put to the witness.

3 **THE COMMISSIONER:** Maybe. Thank you.

4 So C-104 will be the person who is named --
5 the first name on documents -- Exhibit 2726.

6 **MS. JONES:** Thank you very much.

7 Just to summarize his statement, he's
8 essentially repeating similar sort of situations that the
9 other previous two people were, and that is repeated acts
10 of sexual and physical brutality at Classique College in
11 the hands of the priests that he's named there in his
12 statement. Would you agree with me with that?

13 **D/CST. SEGUIN:** Yeah, he has allegations
14 against a priest there.

15 **MS. JONES:** Were you aware at the time of
16 taking these statements in and talking to these people and
17 learning all of this about this place called Classique
18 College, did you know that Classique College had been
19 investigated prior to this, in the 1960s, for similar
20 allegations of people that were ---

21 **THE COMMISSIONER:** Ah, good morning.

22 **MS. LEVESQUE:** I believe the person named in
23 the notes that were just reviewed is not a priest, but a
24 brother.

25 **THE COMMISSIONER:** Thank you.

1 **MS. JONES:** All right, he's called a priest
2 in the statement, but ---

3 **THE COMMISSIONER:** Called a priest in his
4 statement, okay.

5 **MS. JONES:** Were you aware that there had
6 been a previous investigation in the 1960s for similar acts
7 from students complaining about the brothers and the
8 priests there?

9 **D/CST. SEGUIN:** I was not aware of that.

10 **MS. JONES:** I'm just going to refer you,
11 please, to Document 713530 -- 713530.

12 **(SHORT PAUSE/COURTE PAUSE)**

13 **THE COMMISSIONER:** Thank you. So what about
14 this person?

15 **MS. JONES:** This person does not need a
16 moniker.

17 **THE COMMISSIONER:** Does not need a moniker?

18 **MS. JONES:** No.

19 **THE COMMISSIONER:** All right.

20 Exhibit 2727 is Document Number 713530,
21 Audiotaped Interview Report of Ronald Wilson, and the date
22 of interview is the 28th of July, 1999 by Detective
23 Constable Dupuis.

24 ---**EXHIBIT NO./PIÉCE NO. P-2727:**

25 Audiotaped Interview Report of Ronald Wilson

1 dated July 28, 1999

2 **MS. JONES:** This particular person, you can
3 see the occupation there, is the owner of Wilson's Funeral
4 Home but you were likely aware he was a former Cornwall
5 Police Officer?

6 **D/CST. SEGUIN:** Yes.

7 **MS. JONES:** So -- because there is another
8 Ron Wilson as well, so just to be clear which one we're
9 talking about here.

10 And I'd like to refer you directly to Bates
11 page 2284. And Officer Dupuis is obviously well into the
12 investigation that he's tasked with at Project Truth, and
13 he asked Officer Wilson, about halfway down the page:

14 "Are you aware of the term 'clan of
15 pedophiles' being used around the
16 Cornwall area?

17 Wilson: If -- and I can
18 wholeheartedly tell you, no. As far
19 as I'm concerned, in 1967 there was
20 likely a pedophile ring operating."

21 And then he goes on to say:

22 "But I don't think that there is
23 anything currently operating."

24 I think that's what he's saying now.

25 And he clarifies that a little bit further

1 on the next page and he talks about an investigation that
2 was done at Classique College, Bates page 2285.

3 He states:

4 "Detective Sergeant Raymond handled the
5 investigation..."

6 And he mentions a priest that was earmarked at that time
7 and Officer Dupuis said:

8 "Would this still be in the archive
9 files of Cornwall Police Department by
10 chance?"

11 And Officer Wilson said:

12 "They should be, yes."

13 So these were, I'd say, the words of a
14 former Cornwall Police officer that there had been a
15 similar sort of investigation.

16 Now, this comes about, as I say, in July
17 1999, except that it's Officer Dupuis that had taken the
18 statement, but you said several times in the last couple of
19 days that everybody talked about everybody else's findings
20 to keep everybody informed as to what was going on.

21 So would you agree with me that that sort of
22 an investigation could be very useful to you people at
23 Project Truth?

24 **D/CST. SEGUIN:** Cornwall Police's
25 investigation?

1 MS. JONES: Yes.

2 D/CST. SEGUIN: Yes.

3 MS. JONES: Did you do any follow-up to find
4 out if there was in fact such investigation done?

5 D/CST. SEGUIN: I didn't. Possibly
6 Constable Dupuis did. I don't know.

7 MS. JONES: Did you ever have a conversation
8 with Officer Dupuis, who now has this statement, about the
9 statements that you had just procured over the last little
10 while from the last three people that I've mentioned here,
11 C-102, C-103, and C-104, I believe? Did you discuss the
12 statements you had gotten from those three people with
13 Detective Dupuis?

14 D/CST. SEGUIN: I think, yeah, he was there
15 for at least a couple of those interviews, I believe.

16 MS. JONES: So was there ever a discussion
17 at Project Truth to look at classical college as an
18 institution?

19 D/CST. SEGUIN: Well, like I said, I think
20 Don Genier had a file started on that or going on that. I
21 don't know where he would have went with it, with all the
22 people being deceased that we looked at. Everyone that I'm
23 aware of, the alleged suspect was deceased.

24 MS. JONES: But as far as you know, that was
25 the end of the investigation?

1 D/CST. SEGUIN: Yes.

2 MS. JONES: Officer Seguin, those are all my
3 questions that I have for you.

4 At this stage I would ask if you wanted to
5 share any recommendations that you may have with the
6 Commissioner and if you feel that you wish to, you can also
7 discuss any impact on a personal level that this Inquiry or
8 these proceedings have had on yourself.

9 Thank you very much for your time.

10 ---STATEMENT BY/DÉCLARATION PAR D/CST. SEGUIN:

11 D/CST. SEGUIN: Thank you.

12 Mr. Commissioner, I have just a few things.

13 If I could start, firstly, I've had the
14 opportunity to view a large portion of the evidence of the
15 last three organizations, Cornwall Police, the Children's
16 Aid Society and now the Ontario Provincial Police.

17 And as a member of this community, I feel
18 that it is important that the evidence presented here
19 include both the negative and the positive institutional
20 response to sexual abuse.

21 My opinion of the evidence, sir, is that
22 you've been presented with very little evidence regarding
23 the positive institutional response and interaction with
24 the victims of sexual abuse. That is my opinion, sir.

25 There are a couple of other things.

1 Firstly, in regards to access of information for
2 investigators, all police officers need to have full access
3 to other police agencies' records management systems. This
4 sharing of information was a Campbell Commission
5 recommendation, which we're all aware of. Yet to this day,
6 there are still a number of police agencies that I cannot
7 access their records.

8 So hypothetically, if the complaint to
9 Cornwall Police about Jean-Luc Leblanc in August of 1998
10 had been a report to Ottawa Police, we may never have known
11 about it. We don't have access to their records, sir.

12 **THE COMMISSIONER:** And why is that?

13 **D/CST. SEGUIN:** Different records management
14 systems.

15 So I shudder when I think of what could have
16 happened involving these young people and possibly other
17 victims in the Jean-Luc Leblanc case.

18 Most importantly, I think the victims -- in
19 regards to the victims of sexual abuse, I'd like to start,
20 Mr. Commissioner, by echoing Mr. Smith's remarks about the
21 victims and the ongoing issues that they deal with day in
22 and day out, in particular, the importance of the Phase 2
23 support and the ongoing treatment availability for these
24 and the potential other victims who come forward. I cannot
25 overstate its importance, sir.

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

2 **D/CST. SEGUIN:** And finally, to the victims
3 of sexual abuse that we worked with, I want to convey my
4 respect and admiration that I have for them and for their
5 courage to stand up and enlighten us all about what
6 happened to them.

7 The mental anguish, the guilt, the pain and
8 the fear are not their doing, but the courage and belief in
9 themselves is something that they can and I hope they will
10 control.

11 I can't overstate how much respect I have
12 for what they have done and again what they continue to do
13 with their lives.

14 Thank you.

15 **THE COMMISSIONER:** Thank you very much.

16 Mr. Wardle? Oh, I'm sorry, yes.

17 **MR. WARDLE:** Good afternoon, Mr.
18 Commissioner.

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

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

21 **WARDLE:**

22 **MR. WARDLE:** Good afternoon, Officer Seguin.

23 **D/CST. SEGUIN:** Hello, sir.

24 **MR. WARDLE:** My name is Peter Wardle and I
25 act for an organization called Citizens for Community

1 Renewal, which is an organization of concerned Cornwall
2 citizens determined to promote needed institutional reform
3 so as to ensure the protection of children and justice for
4 all, and as you probably know, we have full standing at the
5 Inquiry.

6 D/CST. SEGUIN: Yes, sir.

7 MR. WARDLE: I want to ask just a couple of
8 general questions, Officer. I understand that when you
9 joined Project Truth in 1997, you had not previously been
10 involved in a historic allegation male-on-male; correct?

11 D/CST. SEGUIN: Yes, that's correct.

12 MR. WARDLE: Okay. And my friend asked you
13 some questions yesterday about the kind of briefing you got
14 from Officer Smith, and what I wasn't clear about was did
15 you get any assistance from him or anyone else when you
16 started with Project Truth about interviewing these
17 individuals, male victims?

18 D/CST. SEGUIN: Yes, actually, right at the
19 beginning he explained the process he wanted to use. And
20 also, I think one thing I forgot to mention in-chief was
21 the compassionate -- the compassion for the victims that's
22 required in the issues that they're dealing with.

23 MR. WARDLE: Okay. So maybe we can just get
24 you to elaborate a little on that because you had done a
25 number of sexual assault investigations, as I understand

1 it, before you arrived at Project Truth, but now you were
2 going into something that was a bit different; correct?

3 **D/CST. SEGUIN:** Yes.

4 **MR. WARDLE:** And what do you recall about
5 what kind of advice or instructions you got as to how to
6 interview survivors?

7 **D/CST. SEGUIN:** I don't recall precisely
8 what was said to us. It was very clear the issues that
9 Inspector Smith had with the other cases, historical cases
10 that he dealt with, the training schools, and the
11 importance of being there for them. That was one of the
12 main things, support.

13 **MR. WARDLE:** Do you recall anything specific
14 as to how to take an interview from one of these
15 individuals, in terms of something that would be different
16 from the way you ordinarily took interviews?

17 **D/CST. SEGUIN:** I don't know if it was
18 anything different than what I was used to doing. I don't
19 recall what instructions -- no, I don't recall right now.

20 **MR. WARDLE:** Okay. And do you think going
21 forward that that's something that would be useful to your
22 Force to have some kind of specific protocol or set of
23 guidelines that would deal with these kinds of situations?

24 **D/CST. SEGUIN:** Absolutely.

25 **MR. WARDLE:** Okay. Let me just take up very

1 quickly another issue that my friend dealt with in some
2 detail, and I'm going to ask you about one specific
3 document, 113068. This is a new document and it should be
4 subject to a publication ban, Mr. Commissioner.

5 **THE COMMISSIONER:** Okay.

6 **MR. WARDLE:** Zero six eight (068) is what I
7 have.

8 **THE COMMISSIONER:** Thank you.

9 So you're saying this gentleman should have
10 a ---

11 **MR. WARDLE:** Well, it refers to a number of
12 names, some of which are monikered.

13 **THE COMMISSIONER:** No, no. I'm sorry, but
14 the will say, the name of the person who's giving this will
15 say, is that ---

16 **MR. WARDLE:** It's Officer Seguin's will say,
17 as I understand it.

18 **THE COMMISSIONER:** Oh, I'm sorry. I'm
19 looking at the top. Thank you very much.

20 Exhibit 2728 is a will say of Detective
21 Constable Seguin taken on the 14th of -- no.

22 **MR. WARDLE:** That's his date of birth I
23 think at the ---

24 **THE COMMISSIONER:** No, no, but I was looking
25 -- May '97 is when he ---

1 **MR. WARDLE:** It doesn't appear to have a
2 date.

3 **THE COMMISSIONER:** Okay. In any event, it's
4 his will say. There you go.

5 **--- EXHIBIT NO./PIÈCE NO. P-2728:**

6 (113068) - Will Say of Steve Seguin re:
7 Brian Dufour undated

8 **THE COMMISSIONER:** Wait a minute. Maybe we
9 can do it this way. It's not him. Okay, never mind, we'll
10 go with that.

11 **MR. WARDLE:** Thank you, sir.

12 And Officer, you'll see your business card
13 is at the top of the will say?

14 **D/CST. SEGUIN:** Yes.

15 **MR. WARDLE:** And just -- my friend took you
16 through yesterday the investigation regarding the
17 allegations made by C-97 referred to in the first entry
18 here under September 16, 1997?

19 **D/CST. SEGUIN:** Yes.

20 **MR. WARDLE:** And so this is a will say, as I
21 understand it, which was prepared for disclosure purposes
22 for the eventual prosecution?

23 **D/CST. SEGUIN:** Yes.

24 **MR. WARDLE:** And you'll see, as my friend
25 took you through, there is an initial interview of C-97.

1 There's some information obtained from this individual in
2 Brampton, and that's in November of 1997. There's then an
3 attendance at C-97's residence in October of 1998 and then
4 there's a series of events that start in August of 1999.

5 **D/CST. SEGUIN:** Yes.

6 **MR. WARDLE:** And I appreciate that this may
7 not be the entirety of your investigation, but this clearly
8 summarized the important points for disclosure purposes;
9 correct?

10 **D/CST. SEGUIN:** I think as far as the
11 obtaining of evidence, yes.

12 **MR. WARDLE:** Okay. So coming back to the
13 questions my friend asked yesterday, you and the other
14 officers who were involved in Project Truth had a number of
15 ongoing complex investigations going on at the same time;
16 correct?

17 **D/CST. SEGUIN:** Yes.

18 **MR. WARDLE:** Okay. And was one of the
19 issues that came up from time to time just resource issues?
20 I mean did you feel from time to time that you could have
21 used additional support?

22 **D/CST. SEGUIN:** One thing we could have used
23 for sure is what we refer to now as a VWAP, Victim Witness
24 Assistance Program. We didn't have anybody assigned. That
25 was the biggest issue, I think. We didn't have somebody

1 who could be the hands-on person with the victims; regular
2 contact.

3 **MR. WARDLE:** And what about more frontline
4 support in terms of additional investigators? Because it
5 was a pretty small team; correct?

6 **D/CST. SEGUIN:** Yes. There's good and bad,
7 right, to both.

8 **MR. WARDLE:** Yeah.

9 **D/CST. SEGUIN:** I think if I start with the
10 positive, the fact that we all worked closely together --
11 it was generally teams of two for interviews of victims.
12 The knowledge shared or the availability of the sharing of
13 knowledge, I guess, is very important. At times it would
14 be nice to have extra people and, for instance, a
15 possibility of one other person and have two teams of two,
16 and I think that's initially what was looked for here.
17 That might have helped.

18 **MR. WARDLE:** And I understand your evidence
19 with respect to this particular investigation is that you
20 simply can't remember why there are some of the delays that
21 are outlined here. Is that correct?

22 **D/CST. SEGUIN:** Yeah, that's fair.

23 **MR. WARDLE:** Okay. And I'm not trying to
24 fault you for that, but generally thinking about some of
25 the delays that my friend explored with you, you weren't

1 the person responsible for setting priorities within
2 Project Truth; correct?

3 D/CST. SEGUIN: That's correct.

4 MR. WARDLE: That would be Staff Sergeant
5 Hall?

6 D/CST. SEGUIN: At that time, '97, Sergeant
7 Hall and Inspector Smith.

8 MR. WARDLE: Okay, and -- but you would
9 agree that had there been additional frontline resources,
10 some of these investigations might have proceeded at a
11 faster pace. Is that fair?

12 D/CST. SEGUIN: Yes, especially early on --
13 or I should say when everything started happening. And
14 when I mean "everything", the charges and then disclosure
15 issues and all that stuff. That's when you really see
16 manpower issues come into play.

17 MR. WARDLE: And just to amplify that, once
18 the press release -- there was an initial press release and
19 there was a phone number. Project Truth began to receive
20 calls on a pretty regular basis and all of those calls
21 would be new leads that would have to be followed up?

22 D/CST. SEGUIN: Yeah, I would say most of
23 them were new leads. Yes.

24 MR. WARDLE: All right.

25 Okay. I want to just, if I can, turn to the

1 Exhibit 2718. This is Document 123037, and the issues my
2 friend explored with you regarding Ms. Hallett, and ---

3 **D/CST. SEGUIN:** Could I, before you go on,
4 Mr. Wardle -- Mr. Commissioner, when you say about the
5 manpower issues, the contact with the victims, which is
6 very important, obviously -- and I went through my stuff
7 and I have 458 documented contacts with victims in this
8 case and in my opinion that's a lot, and I could have used
9 two of me.

10 **THE COMMISSIONER:** I'm sorry?

11 **D/CST. SEGUIN:** There could have been two of
12 me doing that, sir.

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

14 **MR. WARDLE:** Well, that was really the point
15 I was trying to get at where my friend was taking you
16 through some of this documentation. It's not that you
17 didn't realize this individual was out there, and he'd made
18 these allegations, but your plate was pretty full.

19 **D/CST. SEGUIN:** It was full on a regular
20 basis, yes.

21 **MR. WARDLE:** And the person who was assigned
22 for figuring out which investigations were given priority
23 was not you, it was Sergeant Hall; correct?

24 **D/CST. SEGUIN:** Or Inspector Smith, yes.

25 **MR. WARDLE:** Or Inspector Smith. Okay.

1 And do you have any knowledge as to how they
2 did that or is that something we should save for Sergeant
3 Hall?

4 **D/CST. SEGUIN:** I don't know if I was in the
5 decision-making process for the assigning of priorities.
6 My information would be brought in as well, like everyone
7 else, and they used that information to make their
8 decisions.

9 **MR. WARDLE:** So let me turn up then Exhibit
10 -- you've got it in front of you -- Exhibit 2718. And just
11 so that you recall it, this is a document that was prepared
12 in connection with the York Regional Police investigation
13 sometime after the events regarding the Leduc prosecution,
14 the first Leduc trial; correct?

15 **D/CST. SEGUIN:** Yes.

16 **MR. WARDLE:** And it contains a summary of
17 your statement. There's then a will say. There's actually
18 a -- someone has typed out your notes for one specific date
19 and then excerpts from your notes follow. Do you see that?

20 **D/CST. SEGUIN:** Yes.

21 **MR. WARDLE:** And then, in fact, I think
22 there's actually the document my friend put in as a
23 separate exhibit, which is the meetings with
24 victims/witnesses by Crown Shelley Hallett.

25 So these are all part of this same document,

1 which is why I'm using it because it's got everything in
2 one place.

3 And just starting first of all with your
4 general comments about Ms. Hallett, I took them -- and I
5 don't want to be unfair, but I took them to be the
6 following: that Ms. Hallett was often late for meetings,
7 correct?

8 **D/CST. SEGUIN:** Yes.

9 **MR. WARDLE:** That she didn't usually show up
10 until just before Court and, as a result, you weren't able
11 to consult with her before Court started in the morning?

12 **D/CST. SEGUIN:** Yes.

13 **MR. WARDLE:** Okay. And you had concerns
14 about her re-interview of some of the witnesses in this
15 particular prosecution; correct?

16 **D/CST. SEGUIN:** Yes.

17 **MR. WARDLE:** Okay. And you've explained
18 this morning or yesterday why that -- why those concerns
19 would arise.

20 But aside from those issues, I take it that
21 you weren't attempting to suggest in this summary or your
22 will say that Ms. Hallett generally wasn't a competent and
23 capable Crown; correct?

24 **D/CST. SEGUIN:** Oh God no.

25 **MR. WARDLE:** Okay. And you had many

1 opportunities to see her in Court, and there's nothing in
2 this will say that suggests that her conduct in Court was
3 inappropriate in any way; correct?

4 **D/CST. SEGUIN:** Contrary to what this looks
5 like, I have a lot of respect for Shelley Hallett. It was
6 what she did that I had a problem with.

7 **MR. WARDLE:** Okay. So let me just back up
8 then and perhaps take you through the chronology a little
9 differently than this morning.

10 As I understand it, this issue, this whole
11 issue arises from the fact that on June 15, 1998 Mr. Dunlop
12 called the mother of one of the complainants, in fact,
13 while Officer Dupuis was in the house, and Officer Dupuis
14 made a note of that in his notebook, and it turns out later
15 that, in fact, Mr. Dunlop had made his own note of this and
16 it became part of his disclosure materials?

17 **D/CST. SEGUIN:** Yes.

18 **MR. WARDLE:** Okay.

19 And on July 4, 2000, two years later -- and
20 this is Exhibit 2633 -- and I can -- I'm not sure we need
21 to turn it up but there's a letter that Ms. Hallett wrote,
22 or a memo, to Officer Dupuis which confirmed that she had
23 the Dunlop Will Say and would be reviewing it for purposes
24 of disclosure; correct?

25 **D/CST. SEGUIN:** Yes.

1 **MR. WARDLE:** And now, if we go forward to
2 February of 2001, this individual who I think is C-18, his
3 mother was testifying at the Leduc trial and the mother
4 made a reference to the phone call from Mr. Dunlop which
5 had happened at that point two-and-a-half years earlier?

6 **D/CST. SEGUIN:** Yes, I think you said C-16?

7 **THE COMMISSIONER:** No, he said 18 but it
8 should be 16.

9 **MR. WARDLE:** C-16, I'm sorry. C-16?

10 **D/CST. SEGUIN:** Yes.

11 **MR. WARDLE:** And that was important, I
12 suggest, because up to that point there had been no
13 indication that Mr. Dunlop had interfered with any of the
14 witnesses in connection with the Leduc prosecution;
15 correct?

16 **D/CST. SEGUIN:** Yes.

17 **MR. WARDLE:** And as I follow the chronology,
18 after court that day -- this is February 7, 2001 and you
19 were present -- the Dunlop material was provided for the
20 first time to the defence who included Mr. Skurka; correct?

21 **D/CST. SEGUIN:** I believe that's the day,
22 yes.

23 **MR. WARDLE:** And your notes indicate that --
24 and your Will Say indicates that Mr. Skurka attacked Mr.
25 Hall, and I guess the Project Truth team, for what was an

1 allegation of wilful non-disclosure?

2 D/CST. SEGUIN: Yes.

3 MR. WARDLE: And according to your Will Say,
4 Ms. Hallett, who was present for this, said she didn't know
5 anything about it?

6 D/CST. SEGUIN: That's correct.

7 MR. WARDLE: In other words, she was taking
8 the position that she didn't know anything about this
9 particular interaction between Mr. Dunlop and the witness?

10 D/CST. SEGUIN: That's my interpretation,
11 yes.

12 MR. WARDLE: And then after that meeting,
13 there's a separate meeting just involving the Project Truth
14 team and Ms. Hallett in which Officer Hall points out to
15 her that, in fact, she had the Dunlop disclosure material
16 and in his Will Say, you know, she should have been able to
17 find this particular reference. Is that correct?

18 D/CST. SEGUIN: Well, he pointed out that
19 she had the material.

20 MR. WARDLE: Okay. And again from the
21 chronology, I understand it, Officer Hall then digs out the
22 next day this July, 2000 memo -- July 4, 2000, Exhibit 2633
23 -- and you provide it to Ms. Hallett on Officer Hall's
24 instructions; correct?

25 D/CST. SEGUIN: Yes.

1 **MR. WARDLE:** Then, as I understand it, the
2 next thing that takes place is that on February the -- by
3 this time, the defence has brought a motion based on wilful
4 non-disclosure on the part of the Crown; correct?

5 **D/CST. SEGUIN:** Yes.

6 **MR. WARDLE:** But that motion at this point
7 is aimed at the investigators. In other words, the Project
8 Truth team, that there has been deliberate non-disclosure
9 of the Dunlop materials?

10 **D/CST. SEGUIN:** At which point? Sorry.

11 **MR. WARDLE:** Prior to February 20th. And I'm
12 -- February 20th is the date when there is the famous
13 meeting involving Inspector Smith and Pat Hall and defence
14 counsel.

15 **D/CST. SEGUIN:** I think we could go back to
16 when we had the meeting on February 8th I believe it is.

17 **MR. WARDLE:** Yes.

18 **D/CST. SEGUIN:** Oh, hang on. Sorry.
19 February 7th.

20 **MR. WARDLE:** So at that point, it was clear
21 that the defence were bringing a -- they would bring a non-
22 disclosure motion based on wilful non-disclosure on the
23 part of the Project Truth team; correct?

24 **D/CST. SEGUIN:** I don't know the date.

25 **MR. WARDLE:** Okay. But somewhere in that

1 time period?

2 D/CST. SEGUIN: In that timeframe, yes.

3 MR. WARDLE: And am I right that -- and I
4 don't want to over simplify, but the issue as you and your
5 colleagues understand it at that time, is Ms. Hallett's
6 taken the position at this meeting with defence counsel
7 that she doesn't know what they're talking about; she
8 didn't know about this communication between Dunlop and the
9 witness; correct?

10 D/CST. SEGUIN: That's correct.

11 MR. WARDLE: And you know -- you and the
12 others on your team know that she had the Dunlop material,
13 that had she reviewed it properly would have alerted her to
14 the fact that this had taken place?

15 D/CST. SEGUIN: At that time I didn't know
16 that.

17 MR. WARDLE: Then, as I understand it, there
18 is some events that you are not involved in, although you
19 were in court that day on February the 20th.

20 Inspector Smith, and he's told us about
21 this, he was summonsed by the defence in connection with
22 their motion and there is a meeting that takes place
23 between him, Officer Hall and defence counsel Skurka and
24 Campbell; correct?

25 D/CST. SEGUIN: I heard Inspector Smith

1 talking about that, yes.

2 MR. WARDLE: Yes. And you weren't present
3 at that meeting?

4 D/CST. SEGUIN: That's correct.

5 MR. WARDLE: Am I right though that after
6 the meeting Mr. Hall, or Officer Hall, asked you to obtain
7 a copy of the July 4, 2000 memo from Ms. Hallett? Is that
8 right?

9 D/CST. SEGUIN: I recall him asking for
10 that. If you could refer to my notes maybe ---

11 MR. WARDLE: I can.

12 D/CST. SEGUIN: --- that would help me.

13 MR. WARDLE: I can. I think I can find
14 that.

15 D/CST. SEGUIN: I do recall him ---

16 MR. WARDLE: It's in your notes, 733264.
17 I'm sorry, I'm not sure I know what Exhibit that is; 733264
18 was made an exhibit this morning -- Exhibit 2710. I don't
19 have a Bates page reference but it's numbered page 156.

20 D/CST. SEGUIN: I recall the incident, Mr.
21 Wardle.

22 THE COMMISSIONER: What date again -- oh,
23 I'm sorry, what page?

24 MR. WARDLE: I have -- it's numbered page
25 156.

1 **THE COMMISSIONER:** Thank you.

2 **MR. WARDLE:** I hope I have that right.

3 **THE COMMISSIONER:** That's good.

4 **MR. WARDLE:** Do you have that in front of
5 you, sir?

6 **D/CST. SEGUIN:** I can see it on Madam
7 Clerk's screen but it's not here yet. Yes, I see it.

8 **MR. WARDLE:** So your note says -- perhaps
9 you can just read the entry after 15:00 hours?

10 **D/CST. SEGUIN:** I think we have to go back
11 up.

12 **MR. WARDLE:** Just got to go back up the
13 page. That's it. Perfect.

14 **D/CST. SEGUIN:** "Attend court. Attempt to
15 locate document for Inspector Hall.
16 Attend Best Western and locate same;
17 memo from Hallett to Hall re: Dunlop
18 disclosure, year 2000."

19 **MR. WARDLE:** And if we go to the document we
20 started this part of the examination with, Exhibit 2718 --
21 this is the material provided to the York Regional Police -
22 - and we go to the fifth page in; this is a page headed
23 "Notes".

24 And just for the Commissioner's reference,
25 as I understand it, this is a typed transcript of your

1 notes of February 26th?

2 D/CST. SEGUIN: Yes, it wasn't prepared by
3 my but that's what it looks like.

4 MR. WARDLE: Yeah. So you'll see that it
5 starts by saying:

6 "In Crown's room with Dupuis, Crown
7 Hallett and Tier and Crown student."

8 And then:

9 "Crown Hallett wants our notes from Feb
10 20, '01, entire day."

11 And I'm just going to skip a little bit, but
12 if we go down you'll see there's a bullet:

13 "Hallett accused us of believing she
14 destroyed original."

15 Do you see that?

16 D/CST. SEGUIN: Yes.

17 MR. WARDLE: And then below that:

18 "I said that was definitely not the
19 case. We keep originals in our files
20 and Pat wanted the original for her
21 file and that I may have had it when I
22 provided same to Crown Hallett, 08 Feb
23 01."

24 And then this is the part I wanted to direct
25 you to:

1 "After not being able to find it in
2 court, called Hallett from courtroom
3 and asked if she had it. She said she
4 had a lot and was currently in a
5 meeting with Inspector Smith. I
6 attended Best Western and went to her
7 room; see Feb 20, '01. And Officer
8 Dupuis took possession of copy and made
9 copy at front desk."

10 Okay, and then you've got below that "u/k"
11 which would be "unknown"?

12 **D/CST. SEGUIN:** Unknown, yes.

13 **MR. WARDLE:** "U/k if he returned her copy.

14 I don't know what occurred from here
15 although I had the impression Officer
16 Dupuis was delivering to defence at NAV
17 Canada."

18 So just focusing on that specific part of
19 this story, as I understand it, on the 20th, after the
20 meeting that took place between Inspector Smith, Sergeant
21 Hall and the defence, you were asked to get a copy of this
22 July 4, 2000 document which has been marked as Exhibit
23 2633. As you describe in these notes, you attended the
24 Best Western and you obtained a copy of it from Ms.
25 Hallett; correct?

1 D/CST. SEGUIN: Yes.

2 MR. WARDLE: Okay. But as I understand
3 these notes, neither you or no one else on the Project
4 Truth team, as far as you know, told Ms. Hallett why you
5 were getting the document; that is, to provide it to
6 defence counsel.

7 D/CST. SEGUIN: I know why I went there. I
8 went to get it because Inspector Hall asked me to get it.

9 MR. WARDLE: I understand that, sir.

10 D/CST. SEGUIN: I don't -- I don't know --
11 sorry, continue, please.

12 MR. WARDLE: So I just want to put this to
13 you and I understand you were following the instructions
14 you'd been given by Officer Hall; correct?

15 D/CST. SEGUIN: Right.

16 MR. WARDLE: He'd asked you to go and get a
17 copy of this document.

18 D/CST. SEGUIN: Yes.

19 MR. WARDLE: And you went to the Best
20 Western and you retrieved it from Ms. Hallett?

21 D/CST. SEGUIN: Yes and "you" being Joe
22 Dupuis and I, yes.

23 MR. WARDLE: Correct.

24 And I'm going to suggest to you that neither
25 Mr. -- Officer Dupuis or you told Ms. Hallett that the

1 document was going to be provided to the defence counsel?

2 D/CST. SEGUIN: No.

3 MR. WARDLE: Okay. And you don't know
4 whether Officer Hall told her; correct?

5 D/CST. SEGUIN: Yeah, I have no idea what
6 the conversation would have been.

7 MR. WARDLE: And the last -- and your notes
8 seem to suggest that you knew at some point that evening
9 that Officer Dupuis was going to be delivering a copy of
10 this document to the defence at NAV Canada.

11 D/CST. SEGUIN: That was my impression of
12 what was going to happen, yes.

13 MR. WARDLE: Okay.

14 And then the imbroglio, if I can use that
15 word, that took place on February 26th happens because
16 Shelley Hallett has found out that a copy of this document
17 has gone to the defence. She -- that she claims not to
18 know that that's happened and this is the first time she's
19 found out about it and she's very upset. Is that fair?

20 D/CST. SEGUIN: Yes, that's fair.

21 MR. WARDLE: Those are all my questions for
22 you. Thank you, sir.

23 THE COMMISSIONER: Thank you.

24 How long are you going to be, Mr. Lee?

25 MR. LEE: Very quick.

1 **THE COMMISSIONER:** All right.

2 **--- CROSS-EXAMINATION BY/CONTRE-INTERROGATOIRE PAR MR. D.**

3 **LEE:**

4 **MR. LEE:** Good afternoon, Mr. Commissioner?

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

6 **MR. LEE:** Officer Seguin, my name is Dallas
7 Lee. I'm on for the Victims' Group. I just have a few
8 areas that I'd like to discuss with you, please.

9 **D/CST. SEGUIN:** Yes, sir.

10 **MR. LEE:** Who decided what your assignments
11 would be during your time on the Project Truth team?

12 **D/CST. SEGUIN:** As far as the allocation of
13 who did what?

14 **MR. LEE:** Yes.

15 **D/CST. SEGUIN:** It would have been, most
16 likely, Pat Hall. Inspector Smith as well was involved in
17 those decisions.

18 **MR. LEE:** Even during Inspector Smith's
19 involvement on Project Truth, would Pat Hall have been the
20 person more likely to have been making decisions on
21 assignments and day-to-day operations?

22 **D/CST. SEGUIN:** Absolutely, day-to-day
23 stuff.

24 **MR. LEE:** And assignments aside in terms of
25 who's a lead investigator on an individual case, who would

1 decide what you would be working on on an individual day or
2 in an individual week?

3 **D/CST. SEGUIN:** Probably a combination of
4 both; direction from then Detective Sergeant Hall and also
5 following up on the material we'd obtained ourselves.

6 **MR. LEE:** So you would have some input into
7 what the top priority was for the week?

8 **D/CST. SEGUIN:** Yes.

9 **MR. LEE:** For yourself, I mean?

10 **D/CST. SEGUIN:** Yes.

11 **MR. LEE:** And the ultimate decision would
12 lie with Pat Hall?

13 **D/CST. SEGUIN:** Yes.

14 **MR. LEE:** And Mr. Wardle asked you -- and I
15 wasn't clear on your answer in terms of -- who decided
16 generally within the context of Project Truth what the
17 highest priority matters were?

18 **D/CST. SEGUIN:** Initially, it was Inspector
19 Smith until he retired and then Inspector Hall after that.

20 **MR. LEE:** And, inevitably, the Project Truth
21 team could not juggle all of the investigative balls in the
22 air at once and, inevitably, a certain investigation would
23 be put on the back burner temporarily while another one was
24 dealt with. Is that right?

25 **D/CST. SEGUIN:** Well, I -- I think, yeah,

1 there was a lot of juggling; that's a perfect term,
2 bouncing between investigations.

3 **MR. LEE:** And who made the ultimate decision
4 on when arrests would be made?

5 **D/CST. SEGUIN:** That would have been either
6 Inspector Smith initially and then Inspector Hall after
7 that.

8 **MR. LEE:** And did I understand your evidence
9 during your -- during chief to be that Pat Hall would have
10 reviewed every statement that came through the Project
11 Truth office?

12 **D/CST. SEGUIN:** I can't say every statement,
13 but I -- he read a lot. Whether he read them all or most,
14 I -- he was reading on a regular basis.

15 **MR. LEE:** He was very much the manager of
16 Project Truth. Is that right?

17 **D/CST. SEGUIN:** Yes.

18 **MR. LEE:** You had direct contact with a
19 number of my clients and I just want to ask you very
20 briefly about a few of them.

21 You've been asked a number of questions
22 about Cindy Burgess Lebrun, you'll recall, in relation to
23 the Jean-Luc Leblanc situation?

24 **D/CST. SEGUIN:** Yes.

25 **MR. LEE:** And you've had direct contact with

1 Ms. Lebrun?

2 D/CST. SEGUIN: Yes.

3 MR. LEE: And, ultimately, charges were laid
4 against Mr. Leblanc in relation to Mr. Lebrun?

5 D/CST. SEGUIN: Yes.

6 MR. LEE: Or Ms. Lebrun, rather.

7 D/CST. SEGUIN: Yes.

8 MR. LEE: And you also would have had
9 contact with two of my clients in relation to Jacques
10 Leduc; C-17 and C-22?

11 D/CST. SEGUIN: I'm not sure who they are.

12 MR. LEE: There are three complainants out
13 of the two that are not C-16. I know you know who C-16 is,
14 but we'll have Madam Clerk -- 17 and 22, Madam Clerk, and
15 if you can stay there for one more while you're up?

16 D/CST. SEGUIN: Yes, C-17 and C-22, thank
17 you.

18 MR. LEE: And can you show him C-10 while
19 you're there, please?

20 D/CST. SEGUIN: Yes, thank you.

21 MR. LEE: So dealing with C-17 and C-22, you
22 recognize those names as complainants?

23 D/CST. SEGUIN: Yes.

24 MR. LEE: And in relation to whom charges
25 were laid against Jacques Leduc?

1 D/CST. SEGUIN: Yes.

2 MR. LEE: And you were also shown the name
3 C-10?

4 D/CST. SEGUIN: Yes, I was.

5 MR. LEE: And you had some dealings with C-
6 10 and charges were ultimately laid against Malcolm
7 MacDonald in relation to his allegations?

8 D/CST. SEGUIN: That's correct.

9 MR. LEE: And you also dealt with two of my
10 clients, I believe, in relation to the Richard Hickerson
11 investigation. One of them is Keith Ouellette?

12 D/CST. SEGUIN: Yes.

13 MR. LEE: You recall Mr. Ouellette?

14 D/CST. SEGUIN: Very well.

15 MR. LEE: And another is named Robert
16 Sheets. Did you have any direct dealing with Robert
17 Sheets?

18 D/CST. SEGUIN: It's not clicking with me
19 right now.

20 MR. LEE: He -- it may well have been --
21 been Officer Genier.

22 In relation to Mr. Hickerson, he was never
23 actually charged in relation to the allegations against
24 him. Is that right? He died before charges were laid?

25 D/CST. SEGUIN: I believe so, yes.

1 **MR. LEE:** Is it your recollection, sir, that
2 Mr. Hickerson was advised that he would be charged in
3 relation to a number of offences, but that the
4 investigation was continuing?

5 **D/CST. SEGUIN:** Not post-death; right?

6 **MR. LEE:** No, no ---

7 **D/CST. SEGUIN:** Your not saying ---

8 **MR. LEE:** --- he was advised -- he was
9 cautioned ---

10 **D/CST. SEGUIN:** Obviously, that wouldn't
11 make sense.

12 **MR. LEE:** --- he was --- I don't know if you
13 recall this or not and I don't want to bring you to it, but
14 Mr. Hickerson was cautioned at one point in relation to a
15 number of allegations and was -- is described in the
16 materials as being "quite tearful" and is quite cooperative
17 and gives a fair amount of information and actually
18 identifies for the officers another person they may want to
19 speak to about allegations against him?

20 **D/CST. SEGUIN:** Yeah, I wasn't involved in
21 dealing with Mr. Hickerson.

22 **MR. LEE:** Okay. My only question for you,
23 is it your understanding that charges were pending at the
24 time of his death?

25 **D/CST. SEGUIN:** Yes, I believe they were.

1 **MR. LEE:** And do you know, specifically, if
2 charges were pending in relation to Robert Sheets and Keith
3 Ouellette? Can you be that specific or are you not sure?

4 **D/CST. SEGUIN:** I believe Keith Ouellette
5 was a complainant in one case. I don't recall about Robert
6 Sheets, sir.

7 **MR. LEE:** Okay, that's fine.

8 You've been asked a number of questions
9 about Exhibit 2718 and that's the -- in relation to the
10 Leduc issues with Shelley Hallett. This is the document
11 that Mr. Wardle took you to.

12 Did you have an opportunity to review this
13 document prior to testifying?

14 **D/CST. SEGUIN:** Not recently.

15 **MR. LEE:** Not recently. This is something
16 you would have prepared though in the context of the
17 investigation by the York Regional Police?

18 **D/CST. SEGUIN:** Yes, that's correct.

19 **MR. LEE:** You would have recognized they
20 were investigating Ms. Hallett's role in this?

21 **D/CST. SEGUIN:** Yes.

22 **MR. LEE:** And I take it you would have been
23 extremely careful in your preparation of these materials
24 given the context of that investigation?

25 **D/CST. SEGUIN:** I was, yes, careful to ask -

1 - answer what they asked and what they wanted clarified.

2 MR. LEE: And you appreciated the possible
3 dire consequences to Ms. Hallett of that investigation?

4 D/CST. SEGUIN: Absolutely.

5 MR. LEE: And this was not something you
6 took lightly?

7 D/CST. SEGUIN: No, I struggled with it.

8 MR. LEE: Can you turn, please, to Bates
9 page ending 730?

10 This is a typewritten summary of your notes,
11 and this relates to an entry on February 26th, 2001, and you
12 note Ms. Hallett as saying:

13 "She says if a stay occurs, it is his
14 doing..."

15 Meaning Pat Hall:

16 "...and she will show that. She said
17 that she is going to do something about
18 it."

19 D/CST. SEGUIN: Yes.

20 MR. LEE: What I'm not clear on here is
21 whether or not this was before or after the oral argument
22 of the Application.

23 D/CST. SEGUIN: The oral argument in court?

24 MR. LEE: Yes.

25 D/CST. SEGUIN: I don't know. I would have

1 to refer to the transcript of the hearings.

2 MR. LEE: You're not exactly clear when that
3 occurred?

4 D/CST. SEGUIN: No.

5 MR. LEE: And do you recall any elaboration
6 by Ms. Hallett or whether or not you questioned her about
7 what she meant by, "she will show that" and, "she is going
8 to do something about it"?

9 D/CST. SEGUIN: No, I didn't ask for any
10 clarification. That wasn't the right time to do it.

11 MR. LEE: You stood back and listened, I
12 take it?

13 D/CST. SEGUIN: Yes.

14 MR. LEE: And in relation to your notes, if
15 you flip a couple of pages, your notes are appended to the
16 document, and we have the -- it's on the screen now, we see
17 February 26th, 2001. Can you tell me when these notes would
18 have been made?

19 D/CST. SEGUIN: Right after the incident,
20 sir.

21 MR. LEE: So they're contemporaneous?

22 D/CST. SEGUIN: Yes.

23 MR. LEE: These weren't made after the fact
24 or during the time of the York Regional Police
25 investigation?

1 D/CST. SEGUIN: Oh, no. God, no.

2 MR. LEE: This isn't you recounting what you
3 recall from that day? That's you taking notes at the time?

4 D/CST. SEGUIN: This is out of my notebook,
5 sir.

6 MR. LEE: This is out of your duty notebook?

7 D/CST. SEGUIN: Yes.

8 MR. LEE: And would you agree with me that
9 the notes in relation to this matter are not typical of
10 what we would see in a police officer's notebook in the
11 sense that there is some editorializing?

12 D/CST. SEGUIN: Yes.

13 MR. LEE: And can you help me understand why
14 that would be the way you took these notes on that day?

15 D/CST. SEGUIN: I certainly didn't expect it
16 to turn into what it has.

17 MR. LEE: Were you asked by anybody, and
18 perhaps Pat Hall in particular, to take very specific
19 detailed notes of this matter at the time?

20 D/CST. SEGUIN: No, I don't even believe he
21 was aware of it, while I was taking the notes.

22 MR. LEE: Did you recognize at the time
23 these conversations and these meetings were occurring that
24 it would be especially important for you to record
25 everything you heard and saw?

1 D/CST. SEGUIN: Why I recorded it like that,
2 I don't know, but I thought it was important at the time.

3 MR. LEE: You were asked towards the end of
4 your examination in-chief today about -- I'm not sure if
5 you were specifically asked, but it came out, and there was
6 a discussion of investigating dead people.

7 D/CST. SEGUIN: Yes.

8 MR. LEE: And as I understood your evidence,
9 the police don't investigate dead people.

10 D/CST. SEGUIN: That's correct.

11 MR. LEE: You can't charge a dead person, so
12 there's not ---

13 D/CST. SEGUIN: That's correct.

14 MR. LEE: --- typically. And the
15 Commissioner asked you, "well, what about in relation to
16 the clan allegation?"

17 D/CST. SEGUIN: Yes.

18 MR. LEE: And you understood, I take it upon
19 review of the Fantino Brief or shortly thereafter, that a
20 number of alleged clan members were deceased?

21 D/CST. SEGUIN: According to that memo, yes.

22 MR. LEE: Ken Seguin is a good example.

23 D/CST. SEGUIN: Yes.

24 MR. LEE: By the time you come upon the
25 Fantino Brief, you recognize that Ken Seguin is pointed to

1 as a major player and he's no longer living?

2 D/CST. SEGUIN: Yes.

3 MR. LEE: And my understanding, and some of
4 the evidence we had from Mr. Smith that I know you were
5 here for, related to his understanding that Project Truth
6 was initially to be an investigation of the Fantino brief?

7 D/CST. SEGUIN: Yeah, that was my
8 understanding as well.

9 MR. LEE: And when you came aboard the
10 Project Truth team, was that your understanding at that
11 time?

12 D/CST. SEGUIN: Yes.

13 MR. LEE: And the Fantino brief contains
14 materials put together by Perry Dunlop?

15 D/CST. SEGUIN: Yes.

16 MR. LEE: And a lot of what Mr. Dunlop is
17 gathering stems from allegations being made by Ron Leroux?

18 D/CST. SEGUIN: Yes.

19 MR. LEE: And the Ron Leroux Affidavit, at
20 least from October 1997, is in the Fantino brief?

21 D/CST. SEGUIN: Yes.

22 MR. LEE: And that contains in very blunt
23 terms the following people are members of a clan of
24 paedophiles?

25 D/CST. SEGUIN: Yes, I -- did you say '97?

1 **MR. LEE:** Ninety-six ('96), I think was the
2 Affidavit. I think I did say '97.

3 **D/CST. SEGUIN:** Yes. Thank you.

4 **MR. LEE:** You know that the Leroux Affidavit
5 was -- at least one of the Leroux Affidavits was in the
6 Fantino brief?

7 **D/CST. SEGUIN:** Yes.

8 **MR. LEE:** And can you help me understand
9 what your instructions were as investigating officer on
10 Project Truth in relation to the clan allegation? What
11 were you looking for?

12 **D/CST. SEGUIN:** I don't think we were really
13 investigating the clan. I mean that's one of the
14 allegations that there was a clan. I think that's all part
15 of investigating the people involved, the allegations made
16 against the different people. A determination as to
17 whether or not there was a clan of paedophiles, I guess,
18 would be made once everything was obtained, all the
19 information and then scrutinized.

20 **MR. LEE:** Were you at any point instructed
21 to specifically turn your mind in each investigation to the
22 connections between people, between alleged perpetrators?

23 **D/CST. SEGUIN:** I think that was -- I know
24 that was in my mind.

25 **MR. LEE:** As an example, if I throw a name

1 out there, would you have understood when an allegation
2 comes in about sexual abuse at the hands of Richard
3 Hickerson, that you were to turn your mind to who he
4 associated with and who he knew and who he dealt with?

5 D/CST. SEGUIN: Yes.

6 MR. LEE: And that would be true even though
7 perhaps before that time, you had no knowledge of Richard
8 Hickerson?

9 D/CST. SEGUIN: Yes.

10 MR. LEE: It didn't matter who it was; if an
11 allegation of sexual abuse is made in this town, in that
12 context, you turned your mind to who he hung out with. Is
13 that correct?

14 D/CST. SEGUIN: Yes, and even more so in the
15 case of a person who is a public official.

16 MR. LEE: Like Mr. Hickerson?

17 D/CST. SEGUIN: Which were the allegations,
18 yes.

19 MR. LEE: And you said a moment ago that you
20 understood that you didn't necessarily need to investigate
21 the clan theory as a whole because inevitably through your
22 investigation of individuals, you would amass a large
23 amount of information; is that correct?

24 D/CST. SEGUIN: Yes.

25 MR. LEE: And if you investigate all these

1 people diligently, at the end of the day, you're going to
2 be left with a mountain of information to sort through?

3 **D/CST. SEGUIN:** Yes.

4 **MR. LEE:** And at the end of the day, that's
5 when the analysis of whether or not there was a clan and
6 whether or not there were ties would be done?

7 **D/CST. SEGUIN:** Yes, that would be a perfect
8 time.

9 **MR. LEE:** Do you recall having specific
10 conversations in that regard with Pat Hall or with Tim
11 Smith or is that just something that you understood?

12 **D/CST. SEGUIN:** Specific conversations about
13 what, sorry?

14 **MR. LEE:** Do you recall at any point having
15 a conversation with anybody, with Pat Hall or Tim Smith,
16 that at the end of the day in Project Truth there was going
17 to be a full and complete analysis of connections between
18 persons and whether or not there was a clan?

19 **D/CST. SEGUIN:** I don't recall any
20 conversation like that.

21 **MR. LEE:** That was just your understanding?

22 **D/CST. SEGUIN:** Well, my understanding of --
23 it would be -- that would be the time to do it.

24 **MR. LEE:** And is it your understanding that
25 that ever occurred?

1 **D/CST. SEGUIN:** I don't believe there was
2 ever any analysis like that; like when you say "analysis,"
3 I think of when we have a person whose job is to do that,
4 assigned and makes charts and all that sort of thing. And
5 we eventually did have an analyst assigned in the
6 preparation of this and ---

7 **MR. LEE:** What's "this"?

8 **THE COMMISSIONER:** "This"?

9 **D/CST. SEGUIN:** This Inquiry, sir. Sorry.

10 **MR. LEE:** And whether a person was assigned
11 or not, it would seem the obvious choice would be Pat Hall?

12 **D/CST. SEGUIN:** I don't know if he was a
13 criminal analyst or not. I don't believe he was.

14 **MR. LEE:** I put it to other OPP witnesses,
15 like Chris McDonell was one, that investigating officers
16 were out putting or were out gathering puzzle pieces, and
17 somebody back at the office was going to put the puzzle
18 together.

19 **D/CST. SEGUIN:** Yeah, for the most part with
20 our input, yes.

21 **MR. LEE:** And when it comes to Project
22 Truth, your understanding of the person putting the puzzle
23 together is that it would be Pat Hall?

24 **D/CST. SEGUIN:** I would think he was the
25 person with the most hands-on for that, yes.

1 **MR. LEE:** And you said that he spent a lot
2 of time in the office reviewing documents?

3 **D/CST. SEGUIN:** Yes.

4 **MR. LEE:** He was handing out assignments?

5 **D/CST. SEGUIN:** Yes.

6 **MR. LEE:** He was the single person involved
7 with Project Truth that would have the most knowledge of
8 what everybody was bringing in?

9 **D/CST. SEGUIN:** I would say. He should.

10 **MR. LEE:** Okay. Thank you, sir. Those are
11 my questions.

12 **D/CST. SEGUIN:** Thank you.

13 **THE COMMISSIONER:** Thank you.

14 Mr. Horn, how long do you think you are
15 going to be?

16 **MR. HORN:** Oh, maybe about half an hour.

17 **THE COMMISSIONER:** Well, we'll have to wait
18 until Monday then, 9:30. Thank you.

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

21 This hearing is adjourned until Monday
22 morning at 9:30 a.m.

23 --- Upon adjourning at 5:36 p.m./

24 L'audience est ajournée à 17h36

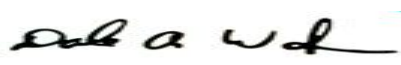
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C E R T I F I C A T I O N

I, Dale Waterman a certified court reporter in the 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, Dale Waterman, 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.



Dale Waterman, CVR-CM