

**IN THE MATTER** of the *Public Inquires Act*, 2009, S.O. 2009, c.33 Sched. 6

**AND IN THE MATTER** of the Elliot Lake Commission of Inquiry

**AND IN THE MATTER** of a Motion for Standing and Funding  
on behalf of **Greg Saunders, P.Eng.**

HONOURABLE PAUL BELANGER,

Commissioner

- and

GREG SAUNDERS, P.Eng

Applicant

**AFFIDAVIT OF GREG SAUNDERS P.Eng.  
SWORN OCTOBER 9, 2012**

I, GREG SAUNDERS, P.Eng., of the City of Sault Ste. Marie,  
District of Algoma, make oath and say as follows:

1. I reside at 28 Parker Avenue, Sault Ste. Marie, Ontario, with my wife, Erin Saunders, and my children Amy, born May 22, 1986, Jamie, born January 12, 1988 and Benjamin, born April 19, 1992.
2. My wife is employed on a part time basis at the Huron Superior Catholic School Board as a teacher's assistant.

3. I adopt as true and accurate the material facts set out in the Motion filed on my behalf seeking Standing and Funding before the Elliot Lake Commission of Inquiry.

4. My wife and I own a home that we reside in at 28 Parker Avenue, Sault Ste. Marie, Ontario. The house is worth approximately \$187,800.00. There is outstanding against the home a mortgage in the sum of \$125,240.00. In addition, we have liabilities to Citi Financial, Scotia Bank, student loans, a Scotia Line of Credit, Scotia Visa and the details of that are set out in **Exhibit "A"** to this my Affidavit. My wife, Erin Saunders, has liabilities of an additional \$15,000.00 by way of a line of credit and debit. Our total financial picture results in us having liabilities in excess of our assets in the range of approximately \$33,696.00.

5. I adopt as true and correct the information set out in Exhibit "A" to this my Affidavit.

6. I cannot produce my tax returns at this time since those were electronically saved in my computer which is now in the possession of the Ontario Provincial Police investigating the collapse of the Algo Centre Mall.

7. My annual take home pay, after statutory deductions, is \$61,256.00. My wife's net take home pay, after statutory deductions, is \$8,364.00.

8. I was, at one time, an employee and shareholder in M. R. Wright & Associates Co. Ltd. That Company was an engineering firm that was located in the City of Sault Ste. Marie, in the District of Algoma and carried out business as a consulting engineering firm. That the Company, since the collapse of the Algo Centre Mall in Elliot Lake, has ceased to carry on business.

9. I am no longer a shareholder in that Company. I received no money on relinquishing my shares in the company.

10. The assets of M. R. Wright & Associates Co. Ltd. were sold to an Engineering Firm of Tulloch Engineering, 71 Black Road, Unit 8, Sault Ste. Marie, ON P6B 0A3. I received no money on that transaction being completed.

11. I am presently employed at a company and hold a position of Vice-President of Engineering.

12. I have every reason to believe that I will be required to testify before the Commission of Inquiry. During that time I will be taken away from my employment and I do not anticipate being paid while absent and attending to those matters related to the inquiry. I have no means or the income that would permit me to hire lawyers, secretarial staff and/or paralegals to assist me to

respond to a summons served upon me by the counsel for the Commission for production of documentations.

13 I have co-operated to date with all authorities investigating this matter and wish to continue to do so. When M. R. Wright & Associates Co. Ltd. was in business and I was with the company, the company had staff available to respond to production of documents and other information requested of it by investigators both from the Ministry of Labour and police authorities. I now require legal counsel and support staff of a law firm to do so.

14. Given my financial situation and commitments to my family I do not have the financial resources to respond properly, to the demands brought about my having to participate in this Inquiry.

15. I require representation during the course of this hearing. Someone needs to be in attendance on my behalf to protect my interests and professional reputation. I am unable to financially afford to retain a law firm who could have lawyers attend at the times and dates necessary to assist me in advancing my position on issues that I am required to address during the course of these proceedings.

16. I am prepared to provide such additional financial information to the Commissioner as the Commissioner may require to assist the Commissioner in

the determination of the question of whether or not I should be granted Standing and full Funding.

SWORN before me at the City )  
of Sault Ste. Marie, in the )  
District of Algoma, this 9<sup>th</sup> )  
day of October, 2012. )

  
\_\_\_\_\_



A COMMISSIONER ETC.

Marise Solange Maltais, a Commissioner, etc.,  
Province of Ontario, for Biscaglia Dumanski  
Romano & Johnson LLP, Barristers and Solicitors.  
Expires May 20, 2013.

**THIS IS EXHIBIT "A"  
TO THE AFFIDAVIT OF  
GREG SAUNDERS, P.Eng.  
SWORN *October 9*, 2012**



**A Commissioner etc.**

Marise Solange Maltais, a Commissioner, etc.,  
Province of Ontario, for Biscaglia Dumanski  
Romano & Johnson LLP, Barristers and Solicitors.  
Expires May 20, 2013.

Financials – Greg Saunders

Assets:

1. House (Appraised Tuesday September 25, 2012)	\$187,800
2. 2007 SeaDoo (Needs repair)	\$ 3,500
3. Jayco Tent Trailer	\$ 4,000
4. Dodge Ram Truck	<u>\$ 25,000</u>
Total Assets	\$220,300

Liabilities:

1. Mortgage	
a. Scotiabank	\$125,240
b. Citi Financial	\$ 25,000
2. Scotia Bank Truck Loan (Dodge Ram)	\$ 39,006
3. TD Student Loan – Wife	\$ 13,287
4. TD Student Loan – Son	\$ 21,460
5. Scotia Line of Credit	\$ 9,900
6. Scotia Visa	<u>\$ 5,103</u>
Total Liabilities	\$238,996

Net Worth:

(\$18,696)

Erin has approximately \$15,000 in line of credit and debt.