

NOV 7/05  
Exhibit # 8

**IN THE MATTER OF THE CORNWALL PUBLIC INQUIRY  
The Honourable G. Normand Glaude, Commissioner**

IN THE MATTER OF an Application for Standing and Funding  
for Part I and Part II of the Cornwall Public Inquiry by Carson Chisholm,  
and The Coalition for Action on Child Sexual Abuse in Cornwall  
also known as "The Coalition for Community Action"  
and "The Citizen's Coalition", through their counsel Anne Mullins

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**NOTICE OF APPLICATION FOR STANDING AND FUNDING**

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The Coalition for Action on  
Child Sexual Abuse in Cornwall

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**NOTICE OF APPLICATION FOR STANDING AND FUNDING**

1. Carson Chisholm and The Coalition for Action on Child Sexual Abuse in Cornwall, also known as The Coalition for Community Action and The Citizen's Coalition (hereinafter referred to as "The Citizen's Coalition") make application for standing and funding in both Part 1 and Part II of the Cornwall Public Inquiry.
2. The Citizen's Coalition is a representative group of concerned citizens of the City of Cornwall. It's lead activist and spokesperson is Carson Chisholm. He, together with approximately fifteen (15) core participants, have been vocal, determined and visible representatives of those among the citizens of Cornwall concerned about allegations of historical abuse of young people, particularly with regard to the institutional response of the Cornwall Police, the Criminal Justice System and the Holy Roman Catholic Church.
3. Carson Chisholm is a resident of the City of Cornwall. He is of a family of twelve, of whom eight still live in and about the City. He is the father of six children.
4. Mr. Chisholm's sister Helen is married to Perry Dunlop. Perry Dunlop was the former City of Cornwall police officer who revealed to the Children's Aid Society an allegation of historical sexual abuse by a member of the local clergy. This act by Cst. Dunlop may well be the single greatest catalyst of the events leading to this inquiry.

5. The allegation revealed by Cst. Dunlop, to the extent it was not only of sexual abuse but of an agreement in which public institutions including the justice system and the Holy Catholic Church participated and was designed, in part, to avoid criminal prosecution, has had personal, familial and public consequences to Mr. Chisholm, his family and those who have joined him in public activism over what transpired following Cst. Dunlop's actions.
6. Carson Chisholm and his sister Helen, among other family members, were active members of the church in which Father Charles MacDonald presided as parish priest. Father Charles MacDonald was the priest alleged to have perpetrated the sexual assault(s) which were the subject of Cst. Dunlop's revelation to the Children's Aid Society.
7. The Citizen's Coalition petitioned, by way of a referendum style question, ten thousand citizens of Cornwall to themselves judge the correctness or not of the conduct of Constable Perry Dunlop. They canvassed for financial support to assist him in a series of legal challenges made as to his continued employment as a police officer.
8. The Citizen's Coalition led a separate petition, garnering the support of 13,000 residents to call for a public inquiry. They lobbied Members of the Legislature. Members of the Coalition monitored the criminal justice proceedings.
9. The Citizen's Coalition, particularly Carson Chisholm, has tirelessly attempted to have the institutional response of the justice system and other public institutions scrutinized in the public forum, drawing for example, the attention of media to the issues as well as demanding a public inquiry.

10. Carson Chisholm, as an individual, has been directly and substantially affected by the events which have precipitated this inquiry. By reason of his familial and religious upbringing and connections, he has personally witnessed the impact of the institutional response of the justice system and the Catholic church, especially upon his sister and brother-in-law.
11. Family members have become estranged from one another, their church, their friends and their community. Mr. Chisholm will be representing the interests of his extended family and the immediate community affected by what has happened and within the inquiry process.
12. The participation of Mr. Chisholm and The Citizen's Coalition in the inquiry is necessary to ensure that public confidence in the inquiry is well founded and nurtured. Given the profile they have assumed to date, it is in the public interest that they participate in Part I. (b) of the mandate to create and develop policies and practises that are designed to improve the response to allegations of abuse; and the processes services and programs that will encourage community healing and reconciliation in Cornwall in accordance with Part II.

**REQUEST THAT THE COMMISSIONER RECOMMEND FUNDING**

13. The Applicant is a non-profit organization relying on limited and inconsistent funds, obtained through fundraising efforts, to carry out it's work. The Applicant does not have specific funding to intervene in this particular matter, despite the substantial contributions it could make.

14. All monies obtained by the Applicant through fund raising efforts have been exhausted by it's contributions to Cst. Dulop's legal expenses.
15. The Applicant has no assets or income to fund legal representation should it be granted standing. Without funding, the Applicant cannot afford to pay for counsel to participate in the hearings.
16. The Applicant has been able to secure counsel who are prepared to accept carriage of this matter, provided that they are compensated for fees and disbursements. The Applicant asks that the Commissioner recommend that they receive funding for those legal expenses.
17. The purpose of the application for funding is to meet the expenses of counsel. Should funding be granted, the time expended by counsel will be docketed in accordance with the hourly rates recommended by the Commissioner. In particular, a rate to allow for time of senior counsel, when necessary, and a reduced rate to allow for time of junior counsel when the needs of the Applicant can be met by counsel with less experience.
18. Counsel for the Applicant would be willing to enter into any reasonable arrangement to ensure that major disbursements are approved in advance.
19. Leaving aside legal expenses, the Applicant will cover it's own expenses for attendance at hearings.
20. The name, address and telephone number and position of the individual who will be responsible for administering the funds is as follows:

**Carol Ann Moss**  
Office Manager  
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21. Ms. Moss is an employee of the law firm of Augustine Bater Polowin LLP. She is the Office Manager. Her duties include, among other things, the daily accounting practices of the firm which involves ensuring that funds received are disbursed for their intended purposes.

For the foregoing reasons, and further reasons as may be anticipated in oral submissions, the Applicant, The Coalition for Action on Child Sexual Abuse in Cornwall, seeks full standing and funding.

ALL OF WHICH IS RESPECTFULLY SUBMITTED  
DATED AT OTTAWA THIS 25<sup>th</sup> DAY OF OCTOBER, 2005

*"Anne Mullins"*

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