

N0007105
Exhibit # 14

**In the Matter of the Cornwall Public Inquiry, the
Honourable G. Norman Glaude, Commissioner**

**And In the Matter of an Application for Full
Standing brought on behalf of the Ontario Provincial
Police Association**

NOTICE OF APPLICATION

TAKE NOTICE that an application will be brought by the Ontario Provincial Police Association ("OPPA") through its counsel William J. Carroll, Carroll & Wallace, 66 Slater St., suite 502, Ottawa, Ontario, pursuant to the Commission's *Rules of Procedure and Practice*, at 10:00 o'clock in the forenoon on the 7th day of November 2005 or so soon thereafter as the Application may be heard at 709 Cotton Mill Street, Cornwall, Ontario.

The Applicant requests that the OPPA be granted full standing for both Part I and Part II of the Inquiry by the Honourable G. Norman Glaude, Commissioner.

THE GROUNDS FOR THIS APPLICATION ARE:

1. The Applicant is the statutory bargaining agent for all non-commissioned officers of the Ontario Provincial Police ("OPP") and civilian members of the OPP not employed in a supervisory or confidential capacity.
2. The Applicant represents the front-line officers who were directly involved in the investigation of allegations of historical abuse of young people in the Cornwall area.

3. The front-line officers form part of the institutional response of the justice system, and as such were integrally involved in the events underlying the mandate of the Inquiry.
4. The conduct of these officers, both past and present, has already been brought to the public forum through the media as well as other court proceedings. The officers are therefore entitled to be afforded an opportunity to be a part of and benefit from an exposition of the facts surrounding these events.
5. Further, the Applicant seeks standing so that it can properly assist the Commission in the organization and presentation of evidence in Part I.
6. The Applicant is directly and substantially affected by the issues to be considered in Part I of the Inquiry, including:
 - a. allegations of historical abuse of young people in the Cornwall area, including the policies and practices then in place to respond to such allegations, and
 - b. the creation and development of policies and practices that were designed to improve the response to allegations of abuse.
7. The Applicant represents clearly ascertainable interests and perspectives to the Commission's mandate, and its participation would enhance the work of the Commission with respect to issues to be considered in Part I of the Inquiry.
8. The Applicant is further directly and substantially affected by the issues to be considered in Part II of the Inquiry, including:
 - a. an inquiry and report on processes, services or programs that will encourage community healing and reconciliation in Cornwall.

9. The Applicant represents clearly ascertainable interests and perspectives to the Commission's mandate, and its participation would enhance the work of the Commission with respect to issues to be considered in Part II of the Inquiry as:
 - a. the OPPA and the officers it represents are part of the Cornwall community and will be responsible for upholding and enforcing the services and programs that will come out of the inquiry and corresponding reports.

IN SUPPORT OF THIS APPLICATION, THE APPLICANT RELIES UPON THE FOLLOWING:

1. This application as well as any documents and materials to be provided through its counsel.

THE ORDER SOUGHT IS:


1. An order allowing the application and granting the Applicant standing in Parts I and II of the Cornwall Public Inquiry.

THE APPLICANT MAY BE SERVED WITH DOCUMENTS PERTINENT TO THIS APPLICATION:

1. Through its counsel Carroll & Wallace, Barristers, Suite 502 – 66 Slater Street, Ottawa, Ontario, K1P 5H1, (Tel. #) (613) 236-5494, and (Fax. #) (613) 232-7322.

DATED at Ottawa, this 20th day of October, 2005.

TO: PETER ENGELMANN
Commission Counsel
The Cornwall Public Inquiry
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