

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

IN THE MATTER OF an Applicant for the Standing and Funding for the Cornwall Public Inquiry by Carson Chisholm, and the Coalition for Action and their lawyer Frank Horn, this application is through their counsel Frank Horn.

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**NOTICE OF APPLICATION FOR STANDING AND FUNDING**

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**NOTICE OF APPLICATION FOR STANDING AND FUNDING**

1. The following is an application for funding and standing for the citizens action group known as the COALITION FOR ACTION, also financial compensation for lead counsel, Frank Horn and an assistant counsel, plus compensation for a research assistant.
2. HISTORY OF THE COALITION FOR ACTION. Initially the citizens of Cornwall were very angry to hear that there were prominent individuals in the community who were supposedly molesting young children for years and no one was doing anything about it. In the early 1990's a Cornwall police officer by the name of Perry Dunlop came upon evidence which established that there was this gross, indecent activity going on in the Cornwall and surrounding area. As a police officer, he conducted an investigation into these matters.
3. Due to the fact he could not get any cooperation within the Cornwall Police Department to lay criminal charges, he wanted instead to go to the Children's Aid Society and report these abuses. While he was doing this, he spoke to his brother-in-law Carson Chisholm to ascertain whether this was the proper thing to do. Without hesitating for a second, Carson Chisholm knew a wrong had been done and something had to be done about this situation. He supported Perry Dunlop's decision to go to the CAS with the complaint.
4. Mister Carson Chisolm become involved right at the very beginning when these disclosures came to light.
5. Carson Chisolm and Perry Dunlop are both devout Roman Catholics and even though these allegations were against Roman Catholic Clergy and others, Carson Chisolm and Perry Dunlop maintained that these individuals that perpetrated these crimes should be held accountable.
6. Right from the very beginning, Perry Dunlop and Carson Chisholm came up against intense opposition within the organizations, which included the Roman Catholic Church, the Cornwall Police department and others.

7. All of the different agencies that should have been there to protect the children did not do their job.
8. As a result of Perry Dunlop and Carson's initiative in starting the investigation, they faced intense personal opposition to themselves, and even their family was subjected to this opposition. Perry Dunlop had to leave Cornwall due to this pressure.
9. The general population in the Cornwall area was in full support of what Dunlop and Chisholm did. Around 1993 A Ten Thousand Signature petition in support of Perry's Dunlop's statement regarding Clerical Sexual abuse being submitted to the Children's Aide Society. This petition was presented to the legislature by John Cleary, MPP for the Cornwall riding. It took over 13 years of lobbying, having general public meetings and fighting in the media to finally force the McGuinty Liberal Government to establish this inquiry. In the year 2000 Carson Chisholm and this organization got over 12,000 signatures demanding that an independent Inquiry be established.
10. During this time the coalition held numerous public meetings in regards to forcing the government to establish the public inquiry. During the entire time that this was going on, the people of Cornwall always supported the efforts of Carson Chisholm and Perry Dunlop. Carson Chisholm was always at the forefront of all these petitions and rallies and everybody knew this. The Coalition was headed by Carson Chisholm and his group and they are the ones who agitated for this Inquiry.
11. The CCR headed by Paul Scott was not and never was a leader in establishing this public inquiry. The Coalition for Action always felt that the CCR was not ~~an~~ accepted by the public, as the representative group representing of the people agitating for the Inquiry.
12. The People of Cornwall identify Perry and Helen Dunlop and Carson Chisholm as the ones who forced the government to set up this inquiry.
13. Paul Scott was never known as the person who got this inquiry going. Paul Scott had nothing to do with any of these matters prior to the year 2000 when the second Petition was being proposed. From 1992 till 2000 Paul Scott and CCR were not in the picture at all.
14. Carson and his group were there right in the beginning, from 1992 until the date the inquiry was established. It was only because the Coalition For Action never stopped lobbying for about 15 years that there is now a public inquiry.
15. The people, in Cornwall, all over the country and from across the world, trust Carson Chisholm and the Coalition. These interested parties knew the coalition never wavered from their determination in having an independent Public Inquiry.

It is this trust that they have earned which will give this public inquiry legitimacy. By Carson Chisholm's group, The Coalition For Action's involvement in this inquiry, they can bring the legitimate people who have been hurt by pedophiles to this public Inquiry without fear because Carson is there.

16. Anybody who has been molested or abused and is aware of this inquiry, know that Perry and Carson are "on their side." The coalition believes that some of these damaged individuals have been manipulated by unknown pressure tactics to turn on Perry and Carson. Carson feels very sorry for these people.
17. Steven Truscott was convicted in 1959 for a crime that he did not commit. He was let down by the system, by prosecutors, police officers and other agencies who should have been there to make sure something like this should never happen. Only on this past ~~the~~ Tuesday, August 28, 2007 has The Attorney General of Ontario, Michael Bryant finally acknowledged there was a miscarriage of justice by allowing this wrongful conviction of Steven Truscott. The government of Ontario over the years has done everything within its power to maintain that what they did in the past was OK, that the cover-up was OK.
18. Only now in Cornwall are we finding out that everything that the Dunlop's and Carson Chisholm said was happening was true and they did the right thing. If it had not been for the efforts of The Dunlop's, Chisholm and the coalition these abuses would have never been exposed and nothing would have ever been done about it.
19. Carson Chisholm has never deviated from his determination to have the truth come out.
20. What role can Carson Chisholm and his Coalition have in this Inquiry.
  - 1 They will give legitimacy to the process by being there.
  - 2 Because the public trusts Carson and his group, the public will feel whatever findings that come out of this inquiry will have some legitimacy.
  - 3 Because of the trust that has been established by Carson and his organization, other organizations around the world will come forward and will want to participate in this process. They will know it won't be a cover up because Carson will be involved.
  - 4 The reason why they will believe this is because Carson did not give up in 15 years of fighting for justice on behalf of the abused and the public. He over-came all the opposition in order for this commission to be established. If Carson and his Organization are not involved, everyone that is in this room should all go home because everything you are doing means nothing. The public will always know that you were opposing the

things that Perry Dunlop and Carson Chisholm and their organization was pushing. They persevered because what they did was based upon deep moral conviction. The civil rights movement in the United States had to have a Martin Luther King; the Anti Apartheid organizations in South Africa had to have a Nelson Mandela and the Unions in Poland had to have Lech Lewenza. The Public Inquiry in Cornwall had to have Perry Dunlop and a Carson Chisholm, and the Coalition For Action, otherwise this whole process would have meant nothing.

21. Please find attached a copy of a signed Affidavit signed by former MPP John Cleary, in which there is proof positive that the two petitions presented to the legislature were as a result of the efforts of Carson Chisholm and the Coalition For Action
22. Please find enclosed another Affidavit, ~~in~~ which will show that Mr. Carson Chisholm and his organization do not have the financial means to participate in this Inquiry. They must get funding in order to participate meaningfully.
23. Also attached are the most up to date lists of the members of the coalition for action.
24. Also included is a copy of our mission statement.
25. And also I want to give my personal resume  
I am a Mohawk Indian Lawyer from Kahnawake, Quebec, I was called to the Bar in 1982 and my practice has been basically Poverty Law. Representing the poor; the dispossessed; poor aboriginals; and all those who do not have the financial means to appear in court. I have had to have a legal aide funded practice of law, mostly before the criminal courts. I am 64 years of age, my wife is a Mohawk from Kahnasetake (OKA), Quebec. I have 5 Children and 4 grandchildren. I have been involved in activist's type of activities on behalf of Aborigines, school teachers, the poor, and the dispossessed of our society.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED DATED AT  
CORNWALL this 29<sup>th</sup> Day of August, 2007**



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**Counsel for the Applicant  
Carson Chisholm**



“ TRUTH

JUSTICE

and

ACCOUNTABILITY”

# COALITION FOR ACTION

*ON CHILD SEXUAL ABUSE  
IN CORNWALL*

## MISSION STATEMENT

*“To press for truth, justice and accountability from both secular and religious authorities for the appalling violations of legal and Christian principles in the child sexual abuse investigation in Cornwall.”*

## GOALS

- An independent public inquiry by the Provincial Government into the child abuse allegations and coverups in the Cornwall area, as proposed in Bill 48 sponsored by MPP Garry Guzzo.
- Full disclosure by the Catholic Church of all allegations of child abuse, coverups and payoffs in the Diocese of Alexandria – Cornwall.
- Justice and support from secular and religious authorities for the victims.

## THE COALITION

- Bill 48 Citizens Committee (Representing 12,000 petitioners)
- Catholic Faithful of Alexandria - Cornwall Diocese
- Concerned Individual Citizens
- Project Truth 2 Website [www.projecttruth2.com](http://www.projecttruth2.com)
- SNAP Canada (Survivors Network of those Abused by Priests)
- Victims' Group
- Allied Organizations and Associations

## SUPPORT

*We thank you for your support. Donations can be made at any Royal Bank to the*

**Coalition for Action – Cornwall**  
Account Number 003-01082-1008606

## WE WANT AN INDEPENDENT PUBLIC INQUIRY:

# WHY?

To investigate a number of unanswered questions, including:

1. **Why** did the Catholic Church violate its own protocol by paying \$32,000 in hush money to a former altar boy who complained about being sexually abused by a priest?
2. **Why** did the Cornwall Police drop an investigation into a charge of child sexual abuse by a priest after the church's \$32,000 payoff?
3. **Why** did the Catholic Church violate its own protocol by not immediately suspending the priest in question once the complaint was lodged?
4. **Why?** The Bishop of Alexandria-Cornwall indicated in the press that more than one payoff has been made. How many? How much? To whom? Which priests were involved? Were they suspended or defrocked? Are they still at large within the church?
5. **Why** will the Diocese not say how much parishioners' money in Alexandria-Cornwall has gone towards payoffs and legal assistance to priests accused of child sexual abuse?

*Continued on next page...*

6. **Why** was only one of the lawyers involved in the hush-money payoff charged with obstruction of justice?
7. **Why** was the lawyer's trial whisked away to Ottawa and why was he given an "absolute discharge" by the justice system?
8. **Why** were other parties to the payoff – including senior officials in the Catholic Church – not charged with obstruction of justice? Is the church above the law?
9. **Why** was former Cornwall Police Constable Perry Dunlop charged and taken to court on two occasions by his own force only to be acquitted because he followed the letter of the law by reporting the child abuse allegation to the Children's Aid Society?
10. **Why**, since the courts ruled that Constable Dunlop correctly obeyed the law, were none of his superiors charged or disciplined for not obeying the law?
11. **Why** did the first OPP investigation – which we were told "left no stone unturned" – find that Cornwall Police acted properly and that there were no grounds for laying charges of child sexual abuse?
12. **Why** was a second OPP investigation started only after a private citizens group conducted its own investigation uncovering evidence of child abuse?
13. **Why** did the second OPP investigation find 15 people to charge when the first OPP investigation found no one to charge?
14. **Why** did it take the Crown Attorney's Office five years to bring the original priest charged to trial – a delay that caused the priest to get off with a "stay" on the grounds his "constitutional right" to a speedy trial had been delayed?
15. **Why** was this "right" violated when the priest himself asked for some of the delays?
16. **Why** were boxes of evidence delivered to the Attorney General's office by Constable Dunlop "lost" and not given to the second OPP investigation?
17. **Why** was evidence – home-made movies taken from the foot of the bed of one of the alleged pedophiles – destroyed by police?
18. **Why** did Rev. Father Paul Lapierre testify under oath that "although I did not abuse children myself, I did know of three other priests who did when I was serving in the Alexandria-Cornwall Diocese?" Who are these priests? Are they still at large within the church?
19. **Why**, if there are no "victims" of child sexual abuse in Alexandria-Cornwall, has the government, through the Attorney General's Office, funded the "Men's Project" which counsels victims of sexual abuse? Why are victims/survivors referred to this group if there was no abuse? Is this not a massive contradiction?
20. **Why** does the government of Ontario not adopt MPP Garry Guzzo's Private Member's Bill 48 for an independent public inquiry as a government priority?

**For further information**

Please contact Robert Roth, Coordinator, at cell (519) 275-7199 or (519) 393-5866 or e-mail to [robroth@quadro.net](mailto:robroth@quadro.net)

**TRUTH**

**JUSTICE**

**and**

**ACCOUNTABILITY**

