

**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 166

Held at :

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

Monday, November 26 2007

Tenue à:

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

Lundi, le 26 novembre 2007

Appearances/Comparutions

Ms. Julie Gauthier	Registrar
M ^e Simon Ruel	Commission Counsel
Ms. Maya Hamou	
Mr. Mark Crane	Cornwall Police Service Board
Mr. Neil Kozloff	Ontario Provincial Police
Mr. Joe Neuberger	Ontario Ministry of Community and Correctional Services and Adult Community Corrections
Mr. Christopher Thompson	Attorney General for Ontario
Mr. Peter Chisholm	The Children's Aid Society of
Mr. Terry Mazerolle	the United Counties
Ms. Helen Daley	Citizens for Community Renewal
Mr. Dallas Lee	Victims Group
Mr. Giuseppe Cipriano	The Estate of Ken Seguin and Scott Seguin and Father Charles MacDonald
Mr. William Carroll	Ontario Provincial Police Association
Mr. Frank T. Horn	Mr. Carson Chisholm
Mr. Ian Paul	

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1 --- Upon commencing at 1:07 p.m./

2 L'audience débute à 13h07

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:** Good afternoon, all.

10 **MR. RUEL:** Good afternoon.

11 **THE COMMISSIONER:** Maître Ruel.

12 **MR. RUEL:** Mr. Commissioner, today we have
13 Mr. Douglas Seguin as a witness.

14 Madam Clerk, if you want to swear the
15 witness?

16 **THE COMMISSIONER:** Thank you.

17 **DOUGLAS SEGUIN, Sworn/Assermenté:**

18 **THE COMMISSIONER:** Good afternoon, sir.
19 You've been here before, but I want to -- not in that seat.

20 **MR. SEGUIN:** No.

21 **THE COMMISSIONER:** So there's water there
22 for you. You have to speak into the microphone so that we
23 can all hear and it gets recorded.

24 If there are any documents, they're going to
25 come through -- we'll give you a hard copy, but sometimes I

1 find it's easier to read on the screen.

2 MR. SEGUIN: Okay.

3 THE COMMISSIONER: So we'll take our time
4 with that.

5 If there's anything you don't feel
6 comfortable with or you have any questions about or you
7 want a break, just turn over and we can have a chat and
8 we'll deal with that.

9 MR. SEGUIN: Okay.

10 THE COMMISSIONER: All right?

11 Do you have any questions, sir?

12 MR. SEGUIN: No, thank you. I don't have
13 any.

14 THE COMMISSIONER: All right.

15 Maître Ruel.

16 --- EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN-CHEF PAR MR.
17 RUEL:

18 MR. RUEL: Good afternoon, Mr. Seguin.

19 MR. SEGUIN: Good afternoon.

20 MR. RUEL: So thank you for being here
21 today. I just want to start with some background about
22 yourself and to situate your testimony immediately.

23 You're the brother of -- or one of the
24 brothers of the late Mr. Ken Seguin?

25 MR. SEGUIN: That's correct.

1 **MR. RUEL:** And we will go through that, but
2 a number of allegations were made through the years against
3 your brother and you and your family have been involved in
4 trying to protect the family name, if I can use that
5 expression, through the years. Is that correct,
6 essentially?

7 **MR. SEGUIN:** That's correct, yes.

8 **MR. RUEL:** So I'm going to go through your
9 background and then I would want you to give us some
10 background on your late brother as well.

11 **MR. SEGUIN:** Okay.

12 **MR. RUEL:** So we'll start with that. So if
13 I can ask you to just give us a bit of background about
14 yourself and about your family?

15 **MR. SEGUIN:** We lived out about two miles
16 east of St. Andrews, just outside of Cornwall, both Ken and
17 I, and we're 10 in the family. I was born in Cornwall, and
18 we went to just a one-room school outside of St. Andrews
19 and then to the CCVS, the Cornwall Collegiate and
20 Vocational Schools for high school. Then I took courses in
21 colleges for chemistry and technical writing, that type of
22 thing. So now I work in a chemical company making wood
23 coatings at the time.

24 Ken ---

25 **MR. RUEL:** So what's your profession?

1 MR. SEGUIN: It's chemist.

2 MR. RUEL: You're a chemist?

3 MR. SEGUIN: A chemist, right.

4 MR. RUEL: A professional chemist?

5 MR. SEGUIN: Yes.

6 MR. RUEL: Okay. Thank you.

7 So you still work in Cornwall?

8 MR. SEGUIN: Yes, yes, I still work in
9 Cornwall.

10 MR. RUEL: And you live in Cornwall?

11 MR. SEGUIN: Yes, I do.

12 MR. RUEL: Have you ---

13 MR. SEGUIN: And I have my wife, Nancy, and
14 I have a daughter, Angela, a granddaughter, and I guess
15 that brings us up to date on me.

16 My brother, then he went ---

17 MR. RUEL: Just a second. Just on the
18 family, you said you were -- there was 10 of you. Ten (10)
19 children?

20 MR. SEGUIN: Yes, yes, okay.

21 MR. RUEL: So how many brothers and sisters?

22 MR. SEGUIN: I had four brothers and five
23 sisters.

24 MR. RUEL: Yourself and your brother Ken,
25 where did you situate yourself in terms of -- in the

1 family?

2 MR. SEGUIN: I see. He was about a year and
3 a month younger than I was.

4 MR. RUEL: So should I understand that he
5 was the youngest in the family?

6 MR. SEGUIN: Yes, youngest in the family.
7 That's correct.

8 MR. RUEL: And you're second youngest?

9 MR. SEGUIN: Second, right. M'hm.

10 MR. RUEL: Okay. So now some background
11 about your late brother Ken in terms of his -- well, why
12 don't we start with his studies?

13 MR. SEGUIN: Okay. After the high school, I
14 believe he took a year at Classical College for French. I
15 believe he needed it to get into St. Paul's University, I
16 believe, and I'm not sure exactly what years were what, but
17 I think Ottawa U as well for -- I think he was there for
18 about six years in the -- I think part of that was
19 Philosophy as part of the seminarian -- and then he left --
20 -

21 MR. RUEL: That's St. Paul's?

22 MR. SEGUIN: Yes, I believe so. Right.

23 MR. RUEL: So what is St. Paul's? Is that a
24 -- it's a university?

25 MR. SEGUIN: Well, I think you study

1 Philosophy and I believe it's connected to the Ottawa U,
2 but it teaches philosophy and arts type courses. I think
3 part of it is courses in Theology. I think that's what he
4 was taking.

5 MR. RUEL: So for six years?

6 MR. SEGUIN: Well, I think part of the last
7 maybe two years, I think, was more seminary and Theology
8 courses.

9 MR. RUEL: So was his intention to become a
10 priest?

11 MR. SEGUIN: Yes, it was initially, right.

12 MR. RUEL: And he changed his mind, I guess?

13 MR. SEGUIN: Yes, he did.

14 MR. RUEL: Then he became a probation
15 officer?

16 MR. SEGUIN: Yes, right -- yes, as soon as
17 he finished his studies, he became a probation officer.

18 MR. RUEL: Did he get a diploma of some
19 sort?

20 MR. SEGUIN: I guess -- I believe two of
21 them, one of them in Arts and I think the other one in
22 Theology, I believe.

23 MR. RUEL: So do you remember when he
24 started as a probation officer?

25 MR. SEGUIN: In '68. I think it was the

1 summer of '68. I'm not sure exactly the months, but I
2 think that is about the time.

3 MR. RUEL: So that was here in Cornwall?

4 MR. SEGUIN: Yes. M'hm.

5 MR. RUEL: Can you give us some background
6 about your brother generally, the type of person he was as
7 you've known him?

8 MR. SEGUIN: Well, I always found him a
9 caring type of a person who -- and a good friend to have.
10 He had -- and I had mutual friends with him as well, always
11 knew everyone else. The people around him seemed to be
12 sort of like him. The family always liked him. They, you
13 know -- even my own daughter thought he was a favourite
14 uncle of hers. Just a very all-round helpful, caring
15 person.

16 MR. RUEL: Was he close to you personally?

17 MR. SEGUIN: Yes, yes, he was.

18 MR. RUEL: And would you and your wife see
19 Ken frequently?

20 MR. SEGUIN: Yes, we would invite him in for
21 supper because he lived outside of Cornwall, and we'd
22 invite him in after he finished work, and he would come
23 over and, you know, we would go out for coffee when he
24 would come into Cornwall. Yeah, we had coffee during --
25 every Saturday. We would go out and help our mother out --

1 she lived out in the farm alone, and we would help her with
2 the flowers or whatever that had to be done around there
3 and always had a lunch that she prepared. So yeah, this
4 was an ongoing thing every Saturday.

5 MR. RUEL: So I gather that your brother had
6 -- lived at some point on -- I guess he must have lived
7 many places, but he lived on Alguire in Cornwall?

8 MR. SEGUIN: Yes. M'hm.

9 MR. RUEL: And in Summerstown as well at
10 some point?

11 MR. SEGUIN: Right. I think he lived after
12 -- he may have lived at home for a year or something until
13 he got an apartment, I think, on Glengarry Avenue, and then
14 bought his house on Laflin there, and in the mid-'80s I
15 think he bought the property down along the river, Glen
16 Walter.

17 MR. RUEL: So at those two locations,
18 Alguire and Summerstown -- well, the property you describe
19 being on the river, I guess you said that was Summerstown?

20 MR. SEGUIN: Yes, Summerstown.

21 MR. RUEL: All right.

22 MR. SEGUIN: Summerstown, right.

23 MR. RUEL: So have you ever visited him at
24 his house?

25 MR. SEGUIN: Of course.

1 **MR. RUEL:** And, if so, how frequently would
2 you do that?

3 **MR. SEGUIN:** Gosh, I would say in both
4 places it was like every week because it's not -- it wasn't
5 only my -- I had a cousin, Jack Seguin, and he had -- there
6 were other friends and we just would go over there. He'd -
7 - I'd pick him up or -- we'd go over and -- and visit him
8 and, you know, we would either go out and have a beer or
9 play pool or that type of thing, so that was -- you know,
10 we -- we were together quite often.

11 **MR. RUEL:** So typically that would be in the
12 evening or in ---

13 **MR. SEGUIN:** Yes, we ---

14 **MR. RUEL:** --- weekdays or weekends?

15 **MR. SEGUIN:** We would go Saturdays, I'd go
16 in whenever I could, sure, and during the days, as well.

17 He -- he didn't have -- you could visit him
18 at any time and he usually liked to work around the house,
19 so he -- you could visit him any time.

20 **MR. RUEL:** So how many times would you visit
21 -- I mean, just a ballpark figure, how many times would you
22 visit him at his house per week, through the years?

23 **MR. SEGUIN:** Through the -- well, on an
24 average? Well, I'd say once a week, on an average.

25 **MR. RUEL:** Can you talk to us about, if I

1 can use "Ken's friends", I guess he had some friends?

2 MR. SEGUIN: Yes. M'hm.

3 MR. RUEL: Can you give us some information
4 about his friends?

5 MR. SEGUIN: Well, he had -- I don't know if
6 I have to name names or what, I don't know.

7 Actually, some of them were on the list of -
8 - and photographs were shown around, I guess, but yeah, one
9 of the close friends was my first cousin, Jack Seguin, and
10 it would be Al Laplante, Don Warden. Those are very close
11 friends and, of course, Father Charles MacDonald, who was a
12 good friend, and I think he -- he -- Malcolm MacDonald was
13 also a friend.

14 MR. RUEL: So Father MacDonald was a priest
15 in Cornwall?

16 MR. SEGUIN: Yes. M'hm.

17 MR. RUEL: And do you know when and where he
18 met Father MacDonald?

19 MR. SEGUIN: I'm not quite sure of that. It
20 -- it either was -- I have a feeling it was after --either
21 while he was up in St. Paul's or after, but I can't quite
22 be sure of that.

23 MR. RUEL: And Malcolm? Malcolm MacDonald
24 was a lawyer here in Cornwall?

25 MR. SEGUIN: Yeah, I think it was really

1 when he started his work at the probation office that I
2 think he knew him.

3 MR. RUEL: Okay. I'll just pause here to
4 remind you and we've discussed that in preparation sessions
5 ---

6 MR. SEGUIN: Yes. M'hm.

7 MR. RUEL: --- that you're aware that some
8 names are protected here and there's one in particular ---

9 MR. SEGUIN: Yes.

10 MR. RUEL: --- that you may want to refer to
11 at some point and there's a moniker for that.

12 MR. SEGUIN: Right.

13 MR. RUEL: So you'll remember that through
14 your ---

15 MR. SEGUIN: Right.

16 MR. RUEL: --- testimony. And if you have
17 any doubt, I would invite you to raise the matter -- well,
18 with the Commissioner ---

19 MR. SEGUIN: Okay.

20 MR. RUEL: --- and we'll confirm you with --
21 if you can name the person.

22 MR. SEGUIN: Oh, okay.

23 MR. RUEL: Anyone else, in terms of Ken's
24 friends that you think about?

25 MR. SEGUIN: Oh, well up in -- well, it

1 depends on which place he was living at. I would -- up at
2 his Laflin, at his -- like he had friends up and down,
3 there was Laflin Street there, we had mutual friends from
4 way back in -- in our single days and they lived -- had
5 their families on -- one had on that street. There was a -
6 - they still visited it quite often with their families.

7 In Summerstown, he did -- because he, when
8 he got there, I think then he -- I believe that's when he
9 met Ron Leroux and C-8 and -- and then he had other people
10 around there as well, you know the Touchettes and the ---

11 **MR. RUEL:** I'm sorry, you just mentioned the
12 Touchettes. The Touchettes are neighbours ---

13 **MR. SEGUIN:** Yes, yes, ---

14 **MR. RUEL:** --- right?

15 **MR. SEGUIN:** --- the neighbours on either
16 side and -- and Mrs. Legault, I think -- I forget her name
17 -- yeah. And on either side and two doors away was Ron
18 Leroux and C-8.

19 **MR. RUEL:** So was he -- I mean he was
20 friends with those people -- was close to -- I mean, the
21 people you've named ---

22 **MR. SEGUIN:** Well, they -- they became
23 friends, yes, because they would come over -- Ron Leroux
24 would come over quite often and, as he would say, and --
25 and he told me, Ron Leroux, that he would go over in the

1 mornings, have coffee before Ken went to -- to work, that
2 type of thing.

3 C-8, I remember Ken talking about him and he
4 wasn't terribly pleased with him in -- in a way. I can
5 remember telling him -- telling me about certain -- I think
6 a -- a shovel or something. There were different things
7 that C-8 would use but then wouldn't give back to him and
8 that type of thing. There were, you know, funny little
9 things like that. He didn't particularly like C-8, I don't
10 think.

11 MR. RUEL: Okay. So you've named a number
12 of people. Have you met yourself, those ---

13 MR. SEGUIN: Yes, I have.

14 MR. RUEL: --- those individuals?

15 MR. SEGUIN: Yes, yes, I have.

16 MR. RUEL: In what context?

17 MR. SEGUIN: Well, visiting Ken's place and
18 we've -- I remember we had to build his boathouse. It was
19 a little bit -- I wanted to raise it a bit and put some
20 walkway around it, that type of thing, and C-8 was there as
21 well and -- and because he was a carpenter and he was
22 pretty good at that type of thing so he was helping.

23 And as far as Ron Leroux, yeah, I've -- they
24 would come into town and -- and we would go for coffee,
25 that type of thing.

1 **MR. RUEL:** Including yourself?

2 **MR. SEGUIN:** Yes, that's right. They picked
3 me up and ---

4 **MR. RUEL:** So would it be fair to say that
5 the people you've named -- Father MacDonald, Malcolm
6 MacDonald, Ron Leroux, C-8 were -- became a group of
7 acquaintances of yourself in addition to Ken?

8 **MR. SEGUIN:** Well, in the sense that I just
9 named them as knowing, but they weren't in a -- they
10 wouldn't have been a group of themselves, you know, in
11 making up a group themselves. It was sort of a separate
12 group, but I don't think -- I've never really known Father
13 MacDonald to associate with C-8 or -- or Ron Leroux or even
14 Malcolm MacDonald.

15 I think Malcolm MacDonald knew C-8 and Ron
16 Leroux, but I don't think Father MacDonald, it -- it was --
17 he may have known them but he didn't associate with them.

18 **MR. RUEL:** So did you, yourself, associate
19 with Father MacDonald and Malcolm MacDonald with Ken
20 separately from those other individuals?

21 **MR. SEGUIN:** Yes, I visited the -- when
22 Father MacDonald was at -- I forget the name of -- the
23 Apple Hill Church, and I visited there with Ken; go down, I
24 think, once or twice.

25 And I don't think I've ever been there with

1 Malcolm MacDonald -- or with Father MacDonald. I don't
2 think I have ever seen him at Ken's, but I, you know, I've
3 seen him other places and -- over the years.

4 **MR. RUEL:** I just want to now to cover a few
5 questions on your late brother's personal life.

6 Was he married?

7 **MR. SEGUIN:** No, no.

8 **MR. RUEL:** Has he ever been married?

9 **MR. SEGUIN:** No.

10 **MR. RUEL:** He was a bachelor?

11 **MR. SEGUIN:** Yes.

12 **MR. RUEL:** He's been a bachelor all his
13 life?

14 **MR. SEGUIN:** Yes, he has, yeah.

15 **MR. RUEL:** And do you know if he had some
16 sort of alternative lifestyle that you would have known
17 about?

18 **MR. SEGUIN:** No, I -- he, from what I
19 gather, he even went out the -- on dates. Remember the --
20 he went out with one of the girls from the office, I
21 believe, at -- early on, maybe in the early '70s -- with a
22 number of other young women, you know, after that, but he's
23 a bachelor, sort of a -- probably quite shy and sort of --
24 as I was for years and years. It sort of, in some
25 instances, curtailed your love life, but that's sort of,

1 you know -- and there was no reason to think any other ---

2 **MR. RUEL:** And were you aware of his sexual
3 orientation, for example? Has that ever ---

4 **MR. SEGUIN:** No, that's never come up to
5 challenge that.

6 **MR. RUEL:** Have you watched the proceedings
7 of this Commission so far?

8 **MR. SEGUIN:** Yes, some of it, yes, or read
9 transcripts.

10 **MR. RUEL:** There's been testimony about
11 frequent visitors at your brother's place, parties. What
12 can you say about -- you've talked about his friends, but
13 other visitors or a group of people visiting your brother,
14 especially in Summerstown, anything you've witnessed
15 through the years?

16 **MR. SEGUIN:** Well, the only parties I've
17 ever been at was just barbeques, that type of thing, in the
18 summertime and I think there were a couple of birthday
19 parties for him and his regular friends that I mentioned
20 and their families would be there. I have never seen any
21 other parties myself, and I've talked to his neighbours,
22 and neither did they, as described in the transcripts.

23 **MR. RUEL:** So I guess -- I mean, that's for
24 what you know, from what you've seen?

25 **MR. SEGUIN:** Yes.

1 **MR. RUEL:** There were other days you weren't
2 there. I mean, you can't testify about that, of course.

3 **MR. SEGUIN:** No, that's -- obviously you
4 can't.

5 **MR. RUEL:** Have you ever witnessed the
6 presence at your brother's place of prominent members of
7 the community such as members of the clergy ---

8 **MR. SEGUIN:** No.

9 **MR. RUEL:** --- police officers ---

10 **MR. SEGUIN:** No again.

11 **MR. RUEL:** --- lawyers or other people?

12 **MR. SEGUIN:** No, no, just Malcolm MacDonald.
13 No, I haven't -- they've never shown up that I could say,
14 no.

15 **MR. RUEL:** Your brother was a probation
16 officer in Cornwall.

17 **MR. SEGUIN:** M'hm.

18 **MR. RUEL:** He's been a probation officer for
19 close to 25 years. That would be accurate?

20 **MR. SEGUIN:** I believe so, yeah. That's
21 pretty accurate.

22 **MR. RUEL:** So can you tell us a bit about
23 his professional work and his professional reputation as a
24 probation officer in Cornwall?

25 **THE COMMISSIONER:** Well, I don't know that -

1 - I don't know if this gentleman can speak of his
2 professional reputation in the community.

3 **MR. RUEL:** Maybe I'll rephrase, Mr.
4 Commissioner.

5 **THE COMMISSIONER:** Yes.

6 **MR. RUEL:** Maybe can you tell us about what
7 you knew your brother was doing as a probation officer
8 generally?

9 **MR. SEGUIN:** Well, generally speaking, yes,
10 I did know, but he didn't speak of -- not very often of any
11 specifics of what he was doing, not any names or anything
12 like that.

13 I found at first he seemed to be pretty gung
14 ho about, you know, helping people and he tended to, I
15 think, be more on the victim's side -- or not victim's
16 side, the probationer's side, shall I say, in trying to
17 sort of help them.

18 He didn't think they were all real bad guys,
19 so he tried to help them out, although I think that may
20 have changed later on and he maybe in the '80s started to
21 become a little more disappointed in the fact that his help
22 probably wasn't as well received as it should have been.

23 **MR. RUEL:** When you say help, he was helping
24 them ---

25 **MR. SEGUIN:** Well, yes, he ---

1 **MR. RUEL:** --- has he told you that or
2 that's what you understood?

3 **MR. SEGUIN:** No, he had told me that at
4 times he would send them either to get a job or he would
5 canvass certain businesses to find out if they would maybe
6 help in getting some of these people a job or if they
7 needed the money, maybe send them to Welfare, that type of
8 thing.

9 **MR. RUEL:** You knew the type of, if I can
10 call them, clients or type of people or clients he was
11 dealing with at the probation office, adults, young, you
12 know, adolescents, the type of clients he was dealing with.
13 Did you know about that?

14 **MR. SEGUIN:** Well, early on, as far as I
15 know, and I believe he told me this, is there was adults.
16 I think at the beginning there may have been, like on his
17 probationary period, that type of thing, that he did have
18 some juveniles, but I think things -- they -- at some point
19 they divided things up somewhere and he was just juvenile -
20 - or just adults.

21 **MR. RUEL:** And do you know when that would
22 have changed?

23 **MR. SEGUIN:** I think it was in the '70s, but
24 I'm -- somewhere in the mid-'70s, that kind of thing, but I
25 can't be sure of the date.

1 **MR. RUEL:** Okay. So to your knowledge -- I
2 mean, your brother was a probation officer, so he was
3 dealing with the -- he was involved in the justice system?

4 **MR. SEGUIN:** Yes. M'hm.

5 **MR. RUEL:** So he would know or deal with
6 various members of the extended justice system, if I can
7 say, such as the police?

8 **MR. SEGUIN:** Yes.

9 **MR. RUEL:** Crowns?

10 **MR. SEGUIN:** That's correct, yes.

11 **MR. RUEL:** Courts?

12 **MR. SEGUIN:** M'hm.

13 **MR. RUEL:** You're aware of that?

14 **MR. SEGUIN:** Yes.

15 **MR. RUEL:** So the police forces he was
16 dealing with, I guess, do you know, I mean, who he was --
17 the police forces he was dealing with?

18 **MR. SEGUIN:** Well, it would be mostly -- it
19 would be both OPP and the Cornwall Police Service, I
20 believe.

21 **MR. RUEL:** Do you know if he had friends
22 among those organizations?

23 **MR. SEGUIN:** Well, I didn't ---

24 **MR. RUEL:** This organization?

25 **MR. SEGUIN:** I didn't know any personally,

1 although I think there was -- he had mentioned a -- but
2 this was -- I think he was a retired detective, but I'm not
3 sure. It might have been like a Scott or something like
4 that. I'm not sure. There was -- but other than that, no,
5 I didn't -- as far as I know, he didn't socialize with any
6 of them and I, knowing him, out with him and all the rest
7 of it, I had never seen any. He might say hello or
8 something like that, but I don't think, you know, there was
9 anything else to it than that.

10 **MR. RUEL:** We know that at one point, I
11 guess, there's -- the Chief of the Cornwall Police was Mr.
12 Claude Shaver.

13 **MR. SEGUIN:** That's correct.

14 **MR. RUEL:** Do you know Mr. Shaver?

15 **MR. SEGUIN:** Well, I've met him, yes.

16 **MR. RUEL:** Did you know if -- are you aware
17 if Ken knew Mr. Shaver?

18 **MR. SEGUIN:** Only in the sense that it's
19 logical to assume he knew him, but I did not think that he
20 was on any social basis with him or anything like that,
21 that type of ---

22 **MR. RUEL:** Had you ever met or seen Mr.
23 Shaver in the company of your brother?

24 **MR. SEGUIN:** No. Only -- well, except for
25 one. He and I were in Ken's boat and we were going down

1 the river, and there -- on the north side of the St.
2 Lawrence, in that area, there's sandbars, and what happens
3 is a lot of people will -- you'll notice boats will stop
4 there if it's a nice, sunny day, in different areas.

5 And as we were passing one time, I believe
6 that I recognized -- there were two couples and I
7 recognized one. Like I said, I think it was a retired
8 detective I recognized, and I didn't know the other couple.
9 And I just asked, "Well, who is the other?" And he said,
10 "Oh, that's Shaver -- Chief Shaver". But he -- you know,
11 that was all in passing.

12 **MR. RUEL:** So were the boats far away when
13 the ---

14 **MR. SEGUIN:** Well probably from here to the
15 upright there, you know, just as we're passing -- we aren't
16 going fast. They were stopped and on the sand bar and so
17 we just -- that was all there was to it.

18 **MR. RUEL:** Was there any waving, you know --
19 either your brother or Mr. Shaver waving at each other or
20 something like that or saying hello ---

21 **MR. SEGUIN:** Well, I think there was the
22 other couple I think was the ones that really -- and I'm
23 not even sure if Shaver -- well, he must have known who it
24 was but I -- you know. it was just a matter of everyone
25 waving.

1 **MR. RUEL:** Everyone waving, from which side?

2 **MR. SEGUIN:** Both. You know.

3 **MR. RUEL:** In terms of Ken's co-workers, did
4 you know any of them?

5 **MR. SEGUIN:** Yes, I did.

6 **MR. RUEL:** Who did you know?

7 **MR. SEGUIN:** Well, during that time, I mean,
8 I'd known Jos van Diepen for a long time. I think it's
9 Louise Quinn. I'd met you know -- because I'd gone in I
10 think a couple of times and I had visited Ken at the
11 office.

12 **MR. RUEL:** So who were those people -- for
13 the record?

14 **MR. SEGUIN:** Well, okay, Joss van Diepen is
15 a probation officer. Louise Quinn was a secretary there.
16 Mrs. Leger was I think she was the sort of office manager
17 that type of thing.

18 **MR. RUEL:** Mrs. Leger is Marcelle Léger?

19 **MR. SEGUIN:** Yes, yes. And later on I think
20 I had met -- I think it's Sue Larivière and maybe Ms.
21 Cardinal. I'm not ---

22 **MR. RUEL:** Carol Cardinal?

23 **MR. SEGUIN:** Pardon?

24 **MR. RUEL:** Carol Cardinal?

25 **MR. SEGUIN:** Could be, it's possible. Yeah,

1 I sort of forget what people -- what they sort of look like
2 at the time now, but -- and Mr. Gendron I think his name
3 was. I did meet him when he first came to Cornwall I
4 believe and I was introduced to him and then later on I
5 talked to him. I went in to the office one time after Ken
6 died and just asked him some questions.

7 **MR. RUEL:** So how did you -- prior to Ken's
8 death, how did you meet those people. Was it at the office
9 or somewhere else?

10 **MR. SEGUIN:** No. I met -- there was a
11 birthday party, I think it was for one of mutual friends, I
12 think. My God, I can't remember exactly whose birthday
13 party it was, and it was at Don Warden's house, and I think
14 that's the first time that I may have met Mr. Gendron
15 because he had come there and I think Malcolm was there and
16 I think, yeah, there were -- okay, that -- Jack's again, my
17 cousin was there.

18 **MR. RUEL:** So that's for Ken's birthday
19 party you're saying?

20 **MR. SEGUIN:** I can't -- I don't remember
21 whether it was Ken's or -- I don't think it was his at Don
22 Warden's. I think it was someone else's.

23 **MR. RUEL:** And have you ever met those
24 people at Ken's residence? Ken's home?

25 **MR. SEGUIN:** Only -- among that -- well,

1 Malcolm.

2 **MR. RUEL:** No, I'm been talking about Ken's
3 co-workers.

4 **MR. SEGUIN:** No, no, I haven't. I don't
5 think I've even seen Jos down there at -- we used to, years
6 before then, used to be a -- we were much younger and we
7 used to have -- go camping and that type of thing and
8 different people would have different camps and that type
9 of thing, but -- so that's where I knew Jos and -- but
10 later on, no, I don't think I -- he had his own family and
11 so on -- things progressed from there and I've never seen
12 him at Ken's place.

13 **MR. RUEL:** Do you know if Ken was friends
14 with some of his co-workers?

15 **MR. SEGUIN:** Yeah, I think he got along well
16 with them and were friends with them. I don't think he
17 necessarily socialized with them. Everyone has their own,
18 you know, their families and so on, so I don't think that
19 was -- and he had his own large family and friends.

20 **MR. RUEL:** Was he closer to some of his co-
21 workers than others to your knowledge?

22 **MR. SEGUIN:** To my knowledge? No. I don't.

23 **MR. RUEL:** What about Nelson Barque? Do you
24 know him?

25 **MR. SEGUIN:** I had met him, yes.

1 **MR. RUEL:** Where did you meet him?

2 **MR. SEGUIN:** Well, from the office I think
3 and not sure if I remember -- they used to go out I think
4 carolling on Christmas Eve or around Christmas time. The
5 whole bunch from the probation office would go out and go
6 to different places and sing outside their homes, and I
7 went with them a couple of times and I'm not sure he may
8 have been in the group as well. But I met -- yeah, I'd met
9 him.

10 **MR. RUEL:** So Nelson Barque was at some
11 point I guess one of the -- Ken's co-workers?

12 **MR. SEGUIN:** Co-workers, right.

13 **MR. RUEL:** Yes. And was he friends with
14 Ken, do you know?

15 **MR. SEGUIN:** I think they got along fine. I
16 don't think there was any -- again, socializing at all but
17 you know that's not -- I can't remember -- I think there's
18 only one time and that was -- it must have been a party --
19 maybe it was a birthday party for Malcolm, I think, because
20 I'm not sure why Gendron -- and I think Barque was there as
21 well at that party at Don Warden's.

22 **MR. RUEL:** And do you know that Mr. Barque
23 left the probation office around 1982?

24 **MR. SEGUIN:** That's -- yes.

25 **MR. RUEL:** You know that?

1 **MR. SEGUIN:** Yes, I heard ---

2 **MR. RUEL:** Do you know the circumstances of
3 his departure there? The reason why he left?

4 **MR. SEGUIN:** Yes. I heard that there was
5 some sexual abuse or whatever. There was a complaint about
6 -- and he left. I had -- there was someone else that I
7 knew that worked there, I guess, for a while and mentioned
8 that Ken was quite angry that they actually just had him
9 retire or whatever and they probably should have charged
10 him back then, but that was -- I had only heard that.

11 **MR. RUEL:** So who told you about this
12 circumstance of Mr. Barque's departure?

13 **MR. SEGUIN:** At that time, this was just a
14 conversation having -- I'm trying to remember the name.
15 Perhaps a little later I'll ---

16 **MR. RUEL:** Sure, if you don't, that's fine.

17 **MR. SEGUIN:** It's just not coming through at
18 the moment.

19 **MR. RUEL:** I'm going -- I just want to cover
20 your knowledge of a person. His name is Gerry Renshaw. Do
21 you know that person?

22 **MR. SEGUIN:** Yes, I do. I'm just gonna ---
23 the name did come through.

24 **MR. RUEL:** Sure.

25 **MR. SEGUIN:** When I say comes through, it

1 must bubble up from somewhere, eh? Yeah, the name was Gary
2 Lalonde.

3 **THE COMMISSIONER:** I'm sorry. Gary ---

4 **MR. SEGUIN:** Gary Lalonde.

5 **THE COMMISSIONER:** Lalonde. Okay.

6 **MR. SEGUIN:** I think he worked at the
7 probation as a volunteer or something like that for a
8 while.

9 **MR. RUEL:** So that didn't come from Ken,
10 that's what you're saying?

11 **MR. SEGUIN:** Yes. It didn't come from Ken,
12 it came from this -- because Gary Lalonde had mentioned
13 that that's what he thought.

14 **MR. RUEL:** Did you discuss Mr. Barque's
15 departure with Ken? The circumstances of his departure?

16 **MR. SEGUIN:** No, I don't -- in fact, back
17 then I don't think I actually really knew about this, or
18 heard about it. I may have read something -- no, it
19 wouldn't have been in the newspaper. Much later. Maybe
20 only when all, you know -- my brother died and all this
21 started coming out that it made any -- but I don't know
22 that I knew back then.

23 **MR. RUEL:** Gerald Renshaw. What do you know
24 about Gerald Renshaw?

25 **MR. SEGUIN:** Well, I met him through Ken and

1 from what I gather he had needed a place to stay and
2 whether he had moved out from his girlfriend's or whatever
3 and asked, you know, to stay at Ken's because he had a
4 spare bedroom. And ---

5 MR. RUEL: Sorry, when was that, from what
6 you remember?

7 MR. SEGUIN: That was in the late '80s I
8 believe.

9 MR. RUEL: And how did that ---

10 MR. SEGUIN: But I didn't know him before
11 then.

12 MR. RUEL: How did that come about? Did Ken
13 know that person previously?

14 MR. SEGUIN: Well, supposedly through the
15 probation office. You know, he was on probation before
16 then and, you know, Ken would help different people and
17 maybe he said "Okay" and went through the proper channels
18 and let him stay there.

19 MR. RUEL: And so that's late '80s that you
20 said?

21 MR. SEGUIN: Yes, late '80s, yeah.

22 MR. RUEL: And so what happened? Did he
23 finally -- I mean, did he stay at Ken's place?

24 MR. SEGUIN: Well, I don't know. It wasn't
25 that long, a year or a year-and-a-half, that type of thing,

1 and off and on. I have a feeling that he would leave and
2 come back and something to do with this, I think, his
3 girlfriend. So he'd go and live with her and come back and
4 that type of thing, but it wasn't always there during that
5 particular time.

6 MR. RUEL: So did that surprise you in any
7 way that Ken would do that?

8 MR. SEGUIN: No. I knew that he helped
9 people out, and particularly had a -- you know, he had that
10 feeling that he would help his probationers out when he
11 could.

12 MR. RUEL: So that's what he did in this
13 case ---

14 MR. SEGUIN: Yes.

15 MR. RUEL: --- according to you?

16 MR. SEGUIN: Yeah.

17 MR. RUEL: Do you know how old was Gerald
18 Renshaw at the time, approximately?

19 MR. SEGUIN: Did I -- how old he was?

20 MR. RUEL: Yes.

21 MR. SEGUIN: I would say in his 20s.

22 MR. RUEL: And Ken then was -- how old was
23 Ken then, back then?

24 MR. SEGUIN: That was in -- well, probably
25 about 45 or 42 or three or something like that.

1 **MR. RUEL:** And did they -- I mean, according
2 to -- I mean, you've met Mr. Renshaw, right, and can you
3 describe the type of relationship they had? I mean, were
4 they friends or just acquaintances? Can you ---

5 **MR. SEGUIN:** Just friends. Yeah, just
6 friends. He was -- Gerry wasn't there really that often.
7 I mean, as far as when I'd be there he really wasn't around
8 very much. He just seemed to be not -- you know, he just
9 used the place as a place to stay or to sleep and then he
10 was gone.

11 **MR. RUEL:** Did he have a room there?

12 **MR. SEGUIN:** Yes, there was a separate, you
13 know ---

14 **MR. RUEL:** So would you see him frequently
15 at Ken's place?

16 **MR. SEGUIN:** Yes, quite frequently he'd be
17 there. But, like I said, for a place for someone staying
18 there he wasn't really there very often that I could see
19 when I would visit.

20 **MR. RUEL:** And Mr. Renshaw -- I'm talking
21 about Gerry or Gerald Renshaw.

22 **MR. SEGUIN:** M'hm.

23 **MR. RUEL:** The relationship, vis-à-vis you,
24 I mean, did you two ever become friends in any way or ---

25 **MR. SEGUIN:** No, more just acquaintances.

1 No, we didn't socialize, shall we say, except, you know,
2 coffees and that type of thing, or if there's a birthday
3 party for Ken, you know, that was it.

4 **MR. RUEL:** So he would be there at like
5 birthday parties. That's what you're saying?

6 **MR. SEGUIN:** There was one that I remember
7 seeing him in 1990.

8 **MR. RUEL:** Did -- well, prior to Ken's death
9 -- and we're going to come to that -- but there's some
10 events that happened after. We're going to cover that
11 soon. But prior to Ken's death, has Mr. Renshaw ever made
12 a comment to your complaint with respect to Ken's
13 behaviour?

14 **MR. SEGUIN:** No, never. No, never has.

15 **MR. RUEL:** Have you ever seen a teenager or
16 teenagers or adolescents at Ken's place; young persons?

17 **MR. SEGUIN:** The only ones I would know of
18 would be my own family, family members. But, no, I've
19 never seen any under age -- you know, no one younger than,
20 say, let's say, Gerry Renshaw. That's -- he did have his
21 own children there I think. They visited with his wife --
22 with his girlfriend or wife. And other than that, no.

23 **MR. RUEL:** Or people that would be -- with
24 that I mean not necessarily being minors but people between
25 the age of, let's say, 18 and 30, younger persons. Did you

1 ever see that type of person at Ken's place?

2 MR. SEGUIN: Well, are you saying 25 to 30
3 is a young -- a really young person or ---

4 MR. RUEL: No, no, I mean, I'm talking young
5 person in the sense of being -- people in their 20s for
6 example.

7 MR. SEGUIN: Well, Gerry Renshaw and I think
8 -- like, actually I can't remember his brothers being there
9 but, no there was -- there was only one person I was
10 introduced to and that was called -- somebody called St-
11 Louis but I don't know the first name.

12 MR. RUEL: And how old was that person?

13 MR. SEGUIN: Oh, he was 25 at least.

14 MR. RUEL: Was he a friend of Ken's?

15 MR. SEGUIN: No -- well, I didn't see that.
16 He was just there with someone else for a short time and
17 then they left.

18 MR. RUEL: And in terms of people being
19 under the age of 20 you've never seen any? That's your ---

20 MR. SEGUIN: No, I don't ---

21 MR. RUEL: Now, I want to talk about, well,
22 a difficult area, I guess. It's your brother's death and
23 the events that led to that event to happen. So prior to -
24 - well, he died on November 25, 1993. That's correct?

25 MR. SEGUIN: M'hm.

1 **MR. RUEL:** Did he ever -- did he speak to
2 you before his death about any problems he may have had?

3 **MR. SEGUIN:** Yes. I think that was the
4 weekend before he -- we were at my brother's place and we
5 were having lunch and he did mention -- he was literally
6 tearful, and he just said he was having a hard time or
7 given a hard time at work is what he said, and so we went
8 outside. I was going to talk to him but somebody came
9 along and interrupted so I never got the explanation of
10 what he meant.

11 **MR. RUEL:** You never got there? I mean, he
12 didn't tell you?

13 **MR. SEGUIN:** No, he didn't tell me, no.

14 **MR. RUEL:** Was he a -- were you a confidante
15 of Ken? I mean, was he speaking to you of his personal
16 issues and problems freely?

17 **MR. SEGUIN:** He didn't -- not really a lot.
18 If there were any -- I think the normal day-to-day goings
19 on maybe he would speak, but if there were very deep issues
20 I don't -- in this particular case, he probably would have
21 but generally no, just as I wouldn't with him or anyone
22 really except, you know, your wife or whatever.

23 I do believe he did go -- I think he had, as
24 I did, over my whole life, a very bad case of depression
25 and so on and I think he had part of that as well. And as

1 I believe he also went to get help for his depression and
2 anxieties or whatever in Cornwall, I believe.

3 MR. RUEL: So prior to his death was he
4 depressed, to your knowledge? Was he in a state of
5 depression?

6 MR. SEGUIN: I remember getting a ride with
7 him and he seemed not to be himself and, in fact, two days
8 before he was at my house and he just seemed to be very,
9 very quite, very -- not talkative.

10 He normally is and we talk easily and about
11 a lot of things, but this -- he didn't two days before.

12 MR. RUEL: So that's two days before his
13 death?

14 MR. SEGUIN: Yes.

15 MR. RUEL: How did you learn about your
16 brother's death?

17 MR. SEGUIN: Ron Leroux's wife Cindy called.
18 It was in the afternoon. And she said that they had found
19 Ken dead. So right away I called my brother Keith at work,
20 and my wife and I drove down and Keith also had drove down
21 as well. We went into the house and I think Miller -- a
22 constable or whatever -- Miller and two or three other
23 policemen were there.

24 MR. RUEL: Those were OPP officers; correct?

25 MR. SEGUIN: Yes, OPP, right.

1 **MR. RUEL:** Yes.

2 **MR. SEGUIN:** And, you know, just gave their
3 condolences, but asked if I wanted to go up and see him or
4 whatever. I just wasn't in the mood to do that, so I just
5 -- we just went and sat down for a while, and then Keith
6 came in. Then we were sort of asked to leave until, I
7 think, around nine o'clock or something. They had finished
8 their investigation.

9 **MR. RUEL:** I forgot to ask you, Mr. --
10 well, I'll come back to that, I'm sorry.

11 Apart from the police officers or -- you
12 mentioned one police officer and there was another one
13 there. Do you ---

14 **MR. SEGUIN:** Well, I think Chris McDonell
15 was there, but I'm not quite sure of that.

16 **MR. RUEL:** Did you see anyone else there?

17 **MR. SEGUIN:** Oh, yes. Well, as we, Nancy
18 and I, walked in toward the house, C-8 was coming out of
19 the house and as he passed, he said something of the nature
20 of, "Ah, well, I expected that" or that -- you know, that
21 type of thing. And then he just kept walking, you know.

22 **MR. RUEL:** How did you -- how did you react
23 to that?

24 **MR. SEGUIN:** Well, I thought that was sort
25 of strange, but I -- you know, I didn't talk to him. He

1 just kept walking.

2 MR. RUEL: So you went to Ken's house and
3 then what happened? You left eventually?

4 MR. SEGUIN: Yes, yes, we left eventually
5 and, you know, made the arrangements and all the rest of
6 it. And at the wake, then we noticed all the people like
7 C-8 and Ron Leroux's family and Gerry Renshaw's kids and
8 his, I believe, brothers or Barries. I'm not sure. Gerry
9 Renshaw was, I think, his -- I'm not sure, but his
10 girlfriend or wife, I think was a Barry. I'm not sure of
11 that, but he had close friends in the Barries. And they
12 were -- seemed to be all there. They came and they sat
13 down with us, sat at the end of the room for hours.

14 I remember my mother commenting about how
15 the children would go up and sort of put their hands on my
16 brother's hands or whatever, and they seemed so sad and
17 that type of thing. But just as Renshaw said before, he
18 told me before there was -- he didn't complain about
19 anything and it shouldn't -- it certainly didn't look like
20 it at that time. As well, they sent flowers.

21 MR. RUEL: When you say "they", who is they?

22 MR. SEGUIN: The -- Gerry and Cindy -- or, I
23 mean, Ron Leroux and Cindy and Gerry and, I believe, the
24 Barries did, yeah.

25 MR. RUEL: So you're talking about the

1 showing, I guess?

2 MR. SEGUIN: Right, the wake.

3 MR. RUEL: And then you saw Gerry Renshaw
4 was there, and his wife, and his children. That's what you
5 said?

6 MR. SEGUIN: Yes.

7 MR. RUEL: Was there any member of the
8 Renshaw family, like his brother or his brothers?

9 MR. SEGUIN: Well, there was -- see, I
10 didn't really know them at all, his brothers or the
11 Barries, but I did notice, sitting back with Gerry was a
12 fellow, sort of a thin, tall guy with long black hair, and
13 I just -- I don't know if it would be one of his brothers
14 or it could have been -- I'd have to see a line-up and then
15 I would know. Whether it was Fred Renshaw or one of the
16 Barries, I don't know.

17 MR. RUEL: Okay. I'm going to -- we didn't
18 cover that yet, but before the funeral home, was there an
19 issue about -- or meeting concerning Ken's phone book?

20 MR. SEGUIN: Yeah, Gerry Renshaw had
21 mentioned to me that -- and I -- it was right around that
22 time, maybe at the wake, that Ron Leroux had the telephone
23 book, and I believe I asked him if he could get it for me.
24 I think it was him that gave me the telephone book.

25 MR. RUEL: And what did you do with it?

1 **MR. SEGUIN:** Well, later on when we were --
2 well, that's getting into another situation where the
3 police -- the OPP, they were looking into -- now, I think
4 we had gone up to them and were sort of -- made a complaint
5 of sorts. We could probably get into it later. And
6 Fougere -- Inspector Fougere was there and he mentioned
7 something about -- well, now, see, at the time -- I can't
8 quite remember the sequence, but I think it was Genier and
9 McDonell -- Chris McDonell were asking -- we had gone in --
10 my brother Keith and I had gone in to make statements
11 surrounding, I think, my brother's death, and that's when I
12 took the telephone book, and gave it to them.

13 **MR. RUEL:** You gave it to the OPP?

14 **MR. SEGUIN:** Yes.

15 **MR. RUEL:** At one of the meetings you had
16 with them?

17 **MR. SEGUIN:** Yes. Right.

18 **MR. RUEL:** We're going to cover it.

19 **MR. SEGUIN:** Okay.

20 **MR. RUEL:** I'll just cover that point right
21 now.

22 You've had some -- I guess either at the
23 funeral home or the funeral with Ron Wilson; is that
24 correct?

25 **MR. SEGUIN:** Yes, that's right.

1 **MR. RUEL:** Can you tell us about that
2 conversation?

3 **MR. SEGUIN:** Yes. I went in and I talked to
4 him, you know, about Ken's death and I believe he was a
5 friend of Ken's and I believe he also had to pick up the
6 body. I guess that wasn't an easy thing to do.

7 **MR. RUEL:** He was the director of the
8 funeral home, right?

9 **MR. SEGUIN:** Yes, he owned -- I believe
10 owned it. He had mentioned -- and by that -- yeah, he
11 mentioned that settlement and he was quite angry and he ---

12 **MR. RUEL:** Which settlement are you
13 referring to?

14 **MR. SEGUIN:** Well, the \$32,000 to David
15 Silmser.

16 **MR. RUEL:** Okay.

17 **MR. SEGUIN:** And he was quite angry that
18 they had made that settlement. Now, "they" meaning -- he
19 mentioned like Malcolm and the bishop, and I think he said
20 others that were involved in that settlement because he
21 thought that was -- put Ken in a very bad situation where
22 he had no way of really defending himself because, you
23 know, the media and so on, it's almost -- the settlement
24 was sort of an admission of guilt. So it put Ken in a very
25 bad situation.

1 **MR. RUEL:** But do you know if Ken was
2 involved or part of that settlement in any way?

3 **MR. SEGUIN:** No, he wasn't, no.

4 **MR. RUEL:** So why would it be an admission
5 of guilt ---

6 **MR. SEGUIN:** Well, because he's ---

7 **MR. RUEL:** --- on ---

8 **MR. SEGUIN:** Because he was a friend of
9 Father MacDonald's and his name was mentioned in the
10 statement which was released.

11 **MR. RUEL:** But by that point the statement
12 had not been released publicly?

13 **MR. SEGUIN:** No, no, that's -- yeah, that's
14 right. Yeah.

15 **MR. RUEL:** So how did you know about that?

16 **MR. SEGUIN:** Good question. Let's see;
17 where were we again?

18 **MR. RUEL:** Because the statement was made
19 public, I mean to the -- in January of 1994 ---

20 **MR. SEGUIN:** Yeah.

21 **MR. RUEL:** --- by Charlie Greenwell, a
22 journalist at CJOH; is that your recollection?

23 **MR. SEGUIN:** Yes, that's right, yeah.

24 **MR. RUEL:** So before that, it was not public
25 in the sense of the general public knowing about it; is

1 that your recollection?

2 **MR. SEGUIN:** Right, right.

3 **MR. RUEL:** So how did you learn about the
4 settlement?

5 **MR. SEGUIN:** Well, it was a -- it was a
6 general knowledge in -- in -- right after it was made, I
7 believe.

8 No, maybe he was the one that mentioned it.
9 Actually, I can't be sure of that.

10 **MR. RUEL:** Okay.

11 **MR. SEGUIN:** But he did mention that -- that
12 it was -- there was a settlement of some sort and they were
13 involved and he was pretty mad at them.

14 **MR. RUEL:** And that would not show Ken in a
15 good light?

16 **MR. SEGUIN:** Yeah, that's right.

17 **MR. RUEL:** Or something of that nature?

18 **MR. SEGUIN:** Yes, that's right.

19 **MR. RUEL:** Is it accurate to say, Mr.
20 Seguin, that you and your family -- but I guess you better
21 speak about you -- had some suspicions about around the
22 circumstances of your brother's death?

23 **MR. SEGUIN:** Yes, we -- right away, I mean
24 we obviously had questioned -- particularly the rest of the
25 family questioned, you know, how he died; knowing that he

1 was depressed and all the rest of it, I went along with it
2 and said, "Well, okay."

3 But there was -- I think what happened
4 there, the -- I think Dr. Conway, who was the coroner at
5 the time, I think he had mentioned to the pathologist or
6 something -- this is what I got out later -- and that he
7 wasn't supposed to tell anybody about the results or
8 whatever, but my wife, Nancy, went down to the -- to the
9 pathologist's and asked to see some of the -- the pictures
10 and so on and -- because we were sort of questioning about
11 this; I didn't know that she was going to do this -- but --
12 and she saw some things what -- like there was something on
13 his hand, what was -- she thought it was a cut but I guess
14 later on they said it was blood or something like that.

15 There were a few things that she saw that
16 she thought should be questioned.

17 Then when I saw the coroner's sort of
18 report, it seemed to be very, very simplified and not very
19 explanatory or anything like that, so I decided to try to
20 clarify the situation so I sent a -- a letter to the Dr.
21 Young, I believe, of the Coroner's Office in Toronto and
22 they then got Bechard, I think it was, in Kingston, to look
23 into it and ---

24 **MR. RUEL:** So the police officers, the OPP
25 officers that were at the scene, I guess ---

1 **MR. SEGUIN:** M'hm.

2 **MR. RUEL:** --- at Ken's house, did they
3 explain to you what they found?

4 **MR. SEGUIN:** Did the police? Yes, they did.

5 We -- we went down, I think it was a week
6 and a half after Ken's death, I went, before Christmas, I
7 think it was, to Lancaster and talked to Chris McDonnell
8 and Millar about this and they told us it was suicide and -
9 - and that type of thing.

10 So that was before I think we -- you know,
11 we would have gotten the report from the coroner.

12 And they also mentioned questions about --
13 well they didn't -- they didn't actually come out and say I
14 don't think, as I remember, that they thought Ken was a
15 pedophile or something; they just started talking about
16 Milton (phonetic) MacDonald, who was Millar's father-in-
17 law, I think it was, and sort of suggesting that there's a
18 lot of this type of thing going on, you know, sexual abuse
19 with minors and, you know, then asked us what we thought of
20 -- around Ken's place and -- and that type of thing.

21 And then they mentioned the tapes, I
22 believe. The two tapes that they had found at Ron Leroux'
23 and said that Ron Leroux had, at one point, said it was
24 Ken's -- they were Ken's.

25 **MR. RUEL:** So this is a discussion with ---

1 MR. SEGUIN: Yes, Millar ---

2 MR. RUEL: --- Millar -- Constable Millar --

3 -

4 MR. SEGUIN: Yes.

5 MR. RUEL: --- from the OPP?

6 MR. SEGUIN: Right.

7 MR. RUEL: You're ahead of me in my

8 organization ---

9 MR. SEGUIN: Oh.

10 MR. RUEL: --- but did you have any -- I

11 mean, they were mentioning things ---

12 MR. SEGUIN: Well, yes, we had no ---

13 MR. RUEL: --- happening at Ken's place?

14 MR. SEGUIN: You know, we had no idea what

15 they were really talking about and, as I remember, my

16 sister and brother with me, and they weren't really too

17 happy with them for bringing up things that we had, you

18 know, were thought -- and they didn't seem to have any sort

19 of backup. They didn't -- you know, we -- people that

20 would ask questions, and right away, and they just sort of

21 seem to be at a loss to explain why they would bring this

22 up.

23 MR. RUEL: Okay. Let me come back to this

24 point ---

25 MR. SEGUIN: Okay.

1 **MR. RUEL:** --- a little bit later.

2 I just want to cover a few points
3 concerning, you mentioned a coroner.

4 And is it accurate to say that you called
5 for an inquest into your brother's death to take place?

6 **MR. SEGUIN:** We had -- well, you know, we
7 didn't really know how to really go about all this but, you
8 know, trying to clarify what the heck really happened here,
9 so we thought, "Well, the first thing we better do is call
10 a lawyer."

11 So we talked to Don Johnson and he got
12 around to, "Well, how would we really find out exactly what
13 happened," or whatever.

14 And so the idea of an inquest came up and I
15 don't think it was necessarily a serious possibility but
16 Don Johnson said that he would ask and -- and -- about it.

17 **MR. RUEL:** Okay. And do you know what
18 happened?

19 **MR. SEGUIN:** Oh, yeah, he did ask and -- and
20 I believe we did get a reply, I think, that suggested that,
21 "No, there wouldn't be an inquest." What we sort of
22 expected in any case.

23 **MR. RUEL:** And how did you react?

24 **MR. SEGUIN:** Well then, we had to --
25 actually that -- after we left there, we really didn't

1 think about that really that much; we just had to go on to
2 other matters because then it started to come out in the
3 media and then that became the -- the next thing to deal
4 with.

5 MR. RUEL: So you mentioned the post-mortem
6 examination report.

7 Madam Clerk, if we could have Exhibit 970?

8 (SHORT PAUSE/COURTE PAUSE)

9 MR. RUEL: So, Mr. Seguin, I don't know if
10 you have the document in front of you.

11 I believe this is a report you were
12 referring to. This is dated November 26 and it was
13 required by Dr. Conway, who was the coroner who handled the
14 case, I guess. So you remember that document?

15 MR. SEGUIN: Yes.

16 MR. RUEL: You had -- this is the document
17 that you had some concerns with. Your -- as you indicated
18 you felt that it was -- rephrase, I guess, but you've said
19 it was not that detailed enough or it was not clear enough
20 in your view.

21 MR. SEGUIN: M'hm.

22 MR. RUEL: Okay. And then you made a
23 complaint. I don't know if we can call this a complaint,
24 but you've raised concerns ---

25 MR. SEGUIN: Yeah.

1 **MR. RUEL:** --- with the Chief Coroner's
2 office about this post-mortem examination report?

3 **MR. SEGUIN:** Yes, that's right.

4 **MR. RUEL:** And this is Document Number
5 124163.

6 Sorry, before we go there, I'm just going to
7 ask you -- just in that document, the second-to-last page,
8 at 8 is Cause of Death and the pathologist there wrote, you
9 know, on January 6th, 1994. I'm sorry, I have to correct
10 the date because this report seems to be -- the report
11 itself seems to be dated January 6th, 1994, that that was
12 attributed to hanging. So did you -- did you contest that
13 conclusion in anyway?

14 **MR. SEGUIN:** No, I don't think we -- it's
15 just that we had some questions about what we saw. I think
16 one of the things that in my own sort of experience, I had
17 gone in there that night and there was some things that I
18 was questioning myself. I saw -- there's a long railing
19 going upstairs and it was all ---

20 **MR. RUEL:** Upstairs? That's in Ken's house?

21 **MR. SEGUIN:** That's right. And it was all
22 bloody, straight all the way down on the railing and it
23 looked like to me very even and as if it was wiped on. So
24 I couldn't figure out, well, why would that be the case.
25 And although I don't think I mentioned it in any complaint

1 that's -- I just thought that was a strange thing to see,
2 that it was hard to -- well, like someone wiped it. Why
3 would one -- why would he wipe the whole thing, you know,
4 and it was very even.

5 And the blood spots on the floor in the
6 kitchen were, as far as I could see, there was no
7 footprints or anything like that in it. There's nothing
8 that I could see that would show me that he was walking
9 around in -- you know, with blood leaking out and why
10 wouldn't it be showing where he actually stepped and so on,
11 and they even say that there were bloody socks and so on,
12 so it just didn't seem -- I still don't understand that
13 one.

14 **MR. RUEL:** Okay, so the document -- the next
15 document is 124163.

16 **THE COMMISSIONER:** Exhibit Number 1027 would
17 be a letter dated March 28th, 1996 addressed to James Young,
18 Chief Coroner from Mr. Douglas Seguin.

19 **---EXHIBIT NO./ PIECE NO 1027**

20 (124163) Letter from Douglas Seguin to
21 Dr. James Young dated March 28th, 1996

22 **MR. RUEL:** Mr. Seguin, this letter here is
23 not signed but do you recall sending this or a ---

24 **MR. SEGUIN:** Yes.

25 **MR. RUEL:** --- substantially similar letter

1 to the Chief Coroner, James Young, in 1996. You do recall
2 that?

3 **MR. SEGUIN:** Yes.

4 **MR. RUEL:** So there you have some concerns,
5 time of death, forensic tests. There were some issues with
6 respect to the external examination?

7 **MR. SEGUIN:** M'hm. M'hm. Yeah, there's ---

8 **MR. RUEL:** So then you got a response on
9 July 12th, 1996 and this is Document Number 124170.

10 **THE COMMISSIONER:** All right. Exhibit 1028
11 is a letter dated July 12th, 1996 addressed to Mr. Doug
12 Seguin, Douglas Seguin, from Mr. Benoit Bechard, M.D.,
13 Regional Coroner for Eastern Ontario.

14 ---EXHIBIT NO./PIECE NO 1028

15 (124170) Letter from Benoit Bechard to
16 Doug Seguin dated July 12th, 1996

17 **MR. RUEL:** So, Mr. Seguin, this is the
18 response you got to your concerns with respect to the post-
19 mortem report. Is that correct?

20 **MR. SEGUIN:** Yes, that's right.

21 **MR. RUEL:** So each of the points that you --
22 each of the concerns, I guess, is answered?

23 **MR. SEGUIN:** Yeah, they ---

24 **MR. RUEL:** And at the last page, Dr. Bechard
25 writes:

1 "Our conclusion is that your brother,
2 Kenneth, died at his own hands. I
3 believe that the proper investigation
4 was done to ensure that this was a
5 death by suicide and not by homicide."

6 **MR. SEGUIN:** M'hm.

7 **MR. RUEL:** And earlier on that page he
8 mentions:

9 "My review of the case indicates that
10 you or members of your family have met
11 with the investigators a total of 83.5
12 hours between November 25, 1993 and
13 July 6, 1994."

14 And he mentions meeting with Inspector
15 Hamelink. So when he says, "with the investigators", are
16 those investigators of the Coroner's office?

17 **MR. SEGUIN:** No, no, I think that looks like
18 it's -- this also had to do with the investigation into the
19 possible extortion by ---

20 **MR. RUEL:** Oh, I see.

21 **MR. SEGUIN:** --- David Silmser, that whole
22 thing.

23 **MR. RUEL:** So he's referring to police
24 investigators there?

25 **MR. SEGUIN:** Yeah, yeah.

1 **MR. RUEL:** Okay. The conclusion that was
2 made here that he had died essentially ---

3 **MR. SEGUIN:** Yeah.

4 **MR. RUEL:** --- that it was a suicide, did
5 you challenge that after the receipt of this?

6 **MR. SEGUIN:** No, we didn't -- no, it's --
7 they did their -- what we asked them to do and that was
8 fine and we went on from there.

9 **MR. RUEL:** Okay. You have some specific
10 complaints about the Coroner, Dr. Conway, as well with
11 respect to his conduct. Can you tell us a bit about that?

12 **MR. SEGUIN:** Yes, we -- my wife and I did go
13 down and talk to him, I think it must have been early '94,
14 I guess, and he was just off-hand about if it's, you know,
15 just regular knowledge that -- and said something about Ken
16 was a homosexual and that ---

17 And so we asked him, well, where did you get
18 that idea, since we were unaware of it. Well, where did he
19 get the idea.

20 **MR. RUEL:** So Dr. Conway said that to you
21 and your wife?

22 **MR. SEGUIN:** Yes. M'hm.

23 **MR. RUEL:** Okay.

24 **MR. SEGUIN:** And so, you know, so we asked
25 him, well what -- and he said, well, the OPP had told him

1 that. And I think one of the reasons we -- they've
2 challenged it or -- was the fact that we saw in the --
3 well, I'm not sure if we had -- about the AIDS testing and
4 we thought, well, if that's what they were doing then they
5 must have assumed other things, but I guess that was a --
6 he told us that was a standard test they do in any case.
7 That's what he said.

8 But I think we just left it that way
9 wondering, you know, why he got this idea and then why was
10 it so easy for him to make that -- have that conclusion.

11 **THE COMMISSIONER:** Well, in this letter here
12 it says that -- first page of Exhibit 1028:

13 "We were told by Dr. Conway that an
14 AIDS test has been done -- had been
15 done -- and there is no report of such
16 a test on the PM Report."

17 And then he goes on:

18 "The reporting of AIDS testing is
19 controlled by *Freedom of Information*
20 and *Protection and Privacy Act.*"

21 In this letter he doesn't ---

22 **MR. SEGUIN:** He doesn't mention that.

23 **THE COMMISSIONER:** He doesn't -- oh, wait a
24 minute.

25 **MR. SEGUIN:** Well, where did I get ---

1 **THE COMMISSIONER:** Just a minute.

2 **MR. SEGUIN:** I didn't get the exact words.
3 I believe he had known about it, in any case.

4 **THE COMMISSIONER:** No, no, you're right.

5 "In this case, since this was done as
6 part of Coroner's autopsy, Dr. Young
7 would be the only person allowed to
8 authorize release of this report. This
9 has been considered necessary to reduce
10 the number of people having access.

11 The result of the AIDS testing in this
12 case was negative."

13 So at the beginning of the paragraph he says
14 there's no report of such a test, but then at the end he
15 says it's negative. So I don't know where we go with that.

16 **MR. SEGUIN:** Maybe when we had gone down to
17 see him he might have mentioned that to us and that's when
18 we had found out ---

19 **THE COMMISSIONER:** Right.

20 **MR. SEGUIN:** --- that he had done an AIDS
21 test. But at any rate, we had found out about it and
22 questioned him on it.

23 **MR. RUEL:** Well, if I can -- just to clear
24 that point maybe, the previous exhibit, Exhibit 1027, this
25 is the complaint, I guess, the concerns that you brought

1 concerning -- with respect to the post-mortem report. In
2 paragraph 2 you talk about that:

3 "Since the OPP initially investigated
4 the death as a homicide on the advice
5 of the Cornwall Police, why was alcohol
6 the only item checked for in the blood
7 and urine since you unaccountably
8 assumed my brother had been homosexual.
9 Dr. Conway told me..."

10 **MR. SEGUIN:** Okay.

11 **MR. RUEL:** "...my brother's blood was tested
12 for AIDS. No evidence for that
13 assumption exists. Is it standard
14 practice for Coroners to assume the
15 deceased is homosexual and test the
16 deceased's blood for AIDS?"

17 So you had an issue with respect to ---

18 **MR. SEGUIN:** Yeah.

19 **MR. RUEL:** --- any suggestion that your
20 brother might have been homosexual. Is that the concern?

21 **MR. SEGUIN:** That's right. And see that,
22 when it says here:

23 "Dr. Conway told me that my brother's
24 blood was tested for AIDS."

25 So I think it was at that meeting my wife

1 and I had with him that he would have told us about that,
2 and it wasn't on the ---

3 **MR. RUEL:** So would it be fair to say that
4 this paragraph here is -- we're going to come to that --
5 but is representative of your actions because you have
6 intervened with respect to, I mean, various institutions,
7 the fact that it was mentioned by some people that your
8 brother was homosexual was an issue for you and your
9 family?

10 **MR. SEGUIN:** Yeah, simply because we were
11 seeing a lot of this, you know, this being equal to this.

12 **THE COMMISSIONER:** What do you mean by that?

13 **MR. SEGUIN:** Well, being homosexual meant
14 that you were a pedophile, and I think that's a lot of --
15 well, by that time we wouldn't have known too much about, I
16 suppose, what Carson Chisholm and so on were eventually
17 saying, but the -- about that one equals the other.

18 **THE COMMISSIONER:** We know that to be -- we
19 know, as a society, that ---

20 **MR. SEGUIN:** Yeah, that's right.

21 **THE COMMISSIONER:** --- one does not equal
22 the other.

23 **MR. SEGUIN:** That's right. But there is
24 sort of a general undertone that some people do. And so it
25 would bother us that that connection might be there.

1 **MR. RUEL:** So you wanted to ---

2 **MR. SEGUIN:** Yeah, clarify or, you know,
3 find out. See, particularly with people, you know, that
4 has high status like a coroner or whatever, when they say
5 something to the media or whatever, people listen to it.

6 And so we're just trying to say, "Hey,
7 where'd you get this?" or "Why do you say that? How do you
8 know that? You know, you didn't ask us, so how do you know
9 it?" And we'd find out that there would be no -- they'd
10 have a blank. They wouldn't have any, you know -- "Well,
11 this person said it" or "That person said it". So we'd
12 just keep following back to see where all this originated.

13 **MR. RUEL:** And did you have a problem -- let
14 me just frame it -- I'm trying to understand what you're
15 saying. You didn't have a problem with, I guess, the media
16 or any other person in Cornwall reporting on your brother
17 as long as it was verified and accurate? You didn't have a
18 problem with reporting?

19 **MR. SEGUIN:** No, if we thought it had some
20 accuracy to it, then fine, but we were finding that most of
21 it was way off base.

22 **MR. RUEL:** There's a mention in that letter,
23 which is the last -- sorry, Mr. Commissioner, I didn't have
24 time to write the number.

25 **THE COMMISSIONER:** It's 1027?

1 MR. RUEL: Yes.

2 THE COMMISSIONER: I'm sorry, 1027 is the
3 letter that Mr. Seguin wrote.

4 MR. RUEL: It's the following, so it's ---

5 THE COMMISSIONER: One-zero-two-eight (1028)
6 ---

7 MR. RUEL: --- 1028.

8 THE COMMISSIONER: --- letter from Mr.
9 Bechard.

10 MR. RUEL: So at page -- the second page of
11 this document there's a mention about a complaint against
12 Dr. Edgar ---

13 MR. SEGUIN: Yes.

14 MR. RUEL: --- regarding a press interview.
15 And Dr. Edgar was a Cornwall Coroner. Is that correct?

16 MR. SEGUIN: Yes, replaced ---

17 MR. RUEL: So what was the issue with Dr.
18 Edgar? You made a complaint against Dr. Edgar?

19 MR. SEGUIN: Right. Well, simply because I
20 already knew that they had -- that the Coroner's Office
21 didn't like -- Dr. Young didn't like people talking out of
22 turn. So Dr. Edgar did as well, and I think he was one of
23 the -- in some article or whatever. It was actually in the
24 Standard Freeholder, I believe, that he actually had said
25 something in there as well in support of Perry Dunlop and

1 what he was saying. And so we thought that was improper
2 given what the action taken against -- or what they said
3 already about Dr. Conway.

4 So we -- I made another complaint, but then
5 they told me that someone had already complained about it
6 and they were already looking into it.

7 **MR. RUEL:** So they're saying here -- Dr.
8 Bechard is saying:

9 "I have already started dealing with
10 this and Dr. Edgar resigned as Coroner
11 on October 10."

12 **MR. SEGUIN:** Right.

13 **MR. RUEL:** "Since action has been taken
14 with respect to similar complaint and
15 since it's not usual to discuss
16 personal matters, I decided not to
17 write back to you."

18 So essentially they were saying to you it
19 had been dealt with?

20 **MR. SEGUIN:** Yeah. M'hm.

21 **MR. RUEL:** So those are your issues with the
22 Coroner's Office, essentially?

23 **MR. SEGUIN:** Yes, pretty well. We made our
24 -- I made my complaints and it was dealt with, and that was
25 pretty well it.

1 **MR. RUEL:** Okay. You've had some other
2 dealings with public institutions, correct ---

3 **MR. SEGUIN:** M'hm.

4 **MR. RUEL:** --- here in Cornwall with respect
5 to your late brother?

6 **MR. SEGUIN:** Yes.

7 **MR. RUEL:** You've had some dealings with the
8 OPP?

9 **MR. SEGUIN:** Yes, as far as like complaints
10 or something?

11 **MR. RUEL:** No, no, but dealings generally?
12 Just establishing the general framework ---

13 **MR. SEGUIN:** Oh yeah.

14 **MR. RUEL:** --- you had some discussions with
15 the OPP?

16 **MR. SEGUIN:** Yes, we had quite a few
17 conversations, particularly when that first -- in '94, when
18 they were looking into the possible extortion by David
19 Silmsers.

20 **MR. RUEL:** Okay. I'll come to that.

21 **MR. SEGUIN:** So we had a lot of
22 conversations back and forth with Hamelink and Fougere and
23 so on.

24 **MR. RUEL:** You've had some dealings with the
25 Cornwall Police Service and the Police Complaints

1 Commission?

2 MR. SEGUIN: Yes, that's right. When we
3 found out that ---

4 MR. RUEL: Briefly, because I'm going to
5 cover those in detail later.

6 MR. SEGUIN: Okay.

7 MR. RUEL: But generally, you've had some
8 dealings ---

9 MR. SEGUIN: Yes, yes.

10 MR. RUEL: Yes. You had some issues with
11 the Children's Aid Society. You made a complaint against
12 Richard Abell?

13 MR. SEGUIN: That's right.

14 MR. RUEL: You have issues with the media as
15 well?

16 MR. SEGUIN: M'hm.

17 MR. RUEL: You've complained about the ---

18 MR. SEGUIN: Yes.

19 MR. RUEL: --- way the media was reporting
20 the information about your brother?

21 MR. SEGUIN: That's right. M'hm.

22 MR. RUEL: That's right.

23 So you had some issues with the Coroner's
24 Office. You had issues with the politicians as well, with
25 Mr. Guzzo in particular?

1 MR. SEGUIN: That's right.

2 MR. RUEL: And you've complained to the --
3 well, both -- two premiers, Premier Harris and ---

4 MR. SEGUIN: Yes.

5 MR. RUEL: --- and Premier Eves about Mr.
6 Guzzo's conduct?

7 MR. SEGUIN: M'hm.

8 MR. RUEL: So you've been quite involved in
9 the community in terms of trying to ---

10 MR. SEGUIN: You know ---

11 MR. RUEL: Well, maybe I can phrase the
12 question as, why did you make all of those interventions?

13 MR. SEGUIN: It was mostly to find out what
14 really was happening as far as investigations or what --
15 because he was dead there is no investigation really that's
16 going to go on, and yet people were saying incredible
17 things in public, in the media, and we just needed to have
18 clarification and to have people to -- if they're going to
19 say something they've got to back it up some way or another
20 and we just didn't see that they were.

21 They were just throwing this out and it
22 affected us, you know, obviously a large family hearing
23 this all of the time and we felt it was our right to be
24 able to have those questions clarified to our satisfaction.

25 Other than that, you're going to have all of

1 this just laid out there as fact -- become, you know, the
2 rumours ended up, as we well know, as essentially fact.

3 **MR. RUEL:** So you say those issues were
4 never investigated. Is that what -- I mean, your brother
5 was dead ---

6 **MR. SEGUIN:** Right.

7 **MR. RUEL:** --- so there was no -- like, for
8 the police, for example, I'm suggesting to you that there
9 couldn't be any investigation on his ---

10 **MR. SEGUIN:** Right.

11 **MR. RUEL:** Any allegations of criminality
12 because he was dead.

13 **MR. SEGUIN:** Well, I think in the
14 investigation into David Silmsen and the extortion I think
15 they did -- within that they probably -- I think they did
16 question a lot of people. Like, I think they questioned
17 Ron Leroux and a lot of different people at that time.

18 And in that sense they were sort of
19 investigating my brother I suppose to that extent, but it
20 wasn't an official one and it would never become public so
21 it didn't really help us out in any way. So we were still
22 left with trying to clarify the -- why he died and how he
23 died.

24 **THE COMMISSIONER:** Could we take a short
25 break, Maître Ruel?

1 **MR. RUEL:** Sure.

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

4 This hearing will resume at 2:50 p.m.

5 --- Upon recessing at 2:40 p.m.

6 L'audience est suspendue à 14h40

7 --- Upon resuming at 3:04 p.m.

8 L'audience est reprise à 15h04

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

11 This hearing is now resumed. Please be
12 seated. Veuillez vous asseoir.

13 **DOUGLAS SEGUIN, Resumed/Sous le même serment:**

14 ---EXAMINATION IN-CHIEF BY/INTERROGATOIRE EN-CHEF PAR MR.
15 **RUEL (Cont'd/Suite):**

16 **MR. RUEL:** Mr. Seguin, we talked about
17 various interventions you made to the police, the
18 Children's Aid Society, the media. So were you driving
19 this as a family member? Were you the only one involved in
20 those interventions?

21 **MR. SEGUIN:** Well, yes, I was the one
22 writing up the complaints and sending them out.

23 **MR. RUEL:** So would you do ---

24 **MR. SEGUIN:** With the support of the family.
25 I mean, they would be behind it, would be supporting it,

1 but I'd be doing the writing.

2 THE COMMISSIONER: You were the
3 spokesperson?

4 MR. SEGUIN: Yes, yes.

5 MR. RUEL: You were the spokesperson?

6 MR. SEGUIN: Yes, right.

7 MR. RUEL: Was the family unanimous? I
8 mean, were they all supporting you for all of your actions?

9 MR. SEGUIN: I would say so, yes.

10 MR. RUEL: So let's talk about the OPP, the
11 Ontario Provincial Police. You've talked earlier about a
12 meeting or a discussion you had with, I think you mentioned
13 constable, but I think it's Detective Constable Miller --
14 MacDonell ---

15 MR. SEGUIN: Yes.

16 MR. RUEL: --- following Ken's death?

17 MR. SEGUIN: That's correct.

18 MR. RUEL: Do you remember that?

19 MR. SEGUIN: Yes.

20 MR. RUEL: If I suggest to you that it was
21 on December 15th, 1993 would that be ---

22 MR. SEGUIN: Very like ---

23 MR. RUEL: --- possible?

24 MR. SEGUIN: Yes, that's sounds -- yes.

25 MR. RUEL: So what was the nature -- what

1 was the ---

2 **THE COMMISSIONER:** What was your concern?

3 **MR. SEGUIN:** Well, we were down there just
4 to find out what their findings were in the investigating
5 his death.

6 **MR. RUEL:** So did you ask for that meeting
7 or they called you?

8 **MR. SEGUIN:** I think we probably asked them.
9 We probably called and asked them when they would be
10 getting finished with their report and so on. But I think
11 we wanted to talk to them as soon as possible.

12 **MR. RUEL:** So it's about your brother's
13 death essentially.

14 **MR. SEGUIN:** Yes. Right. M'hm.

15 **MR. RUEL:** And you had some -- you've
16 mentioned some comments I guess that were made by the
17 officers ---

18 **MR. SEGUIN:** Yes.

19 **MR. RUEL:** --- regarding your brother?

20 **MR. SEGUIN:** Yes.

21 **MR. RUEL:** And you had some issues with
22 that?

23 **MR. SEGUIN:** Yes, we did, yeah.

24 **MR. RUEL:** So then ---

25 **MR. SEGUIN:** And then because of that we ---

1 **THE COMMISSIONER:** What were the comments?

2 **MR. RUEL:** What were the comments, yes?

3 **THE COMMISSIONER:** What were the concerns?

4 **MR. SEGUIN:** The suggestion that there were
5 -- abuse of young people and ---

6 **MR. RUEL:** On the part of your brother?

7 **MR. SEGUIN:** Yes -- well, I guess they were
8 mentioning my brother, but they had no specific names or
9 anything of that sort, well, except Silmser. I think that
10 was -- David Silmser. I think that might have been brought
11 up.

12 You know, they brought up Milton MacDonald
13 and the possibility that, you know, that type of thing was
14 happening.

15 **MR. RUEL:** So what did you -- how did you
16 react?

17 **MR. SEGUIN:** Well, we reacted as if -- you
18 know, sort of insulted because we did not know anything
19 about this and so we -- at that point we didn't tell them
20 this at the time but then we got in touch with an Inspector
21 Fougere in Long Sault, who was the eastern -- or was the
22 head of the sort of the region around this area.

23 **MR. RUEL:** So just before you go there, who
24 was there at that meeting with Detective Constable Millar
25 and McDonnell? Was there any other police officer?

1 **MR. SEGUIN:** No, just those two police
2 officers and my sister, Helena, and my brother, Keith.

3 **MR. RUEL:** Okay. So then you're talking
4 about Inspector Fougere. So in what context did you call
5 Inspector Fougere?

6 **MR. SEGUIN:** Well, from what we heard from
7 these two, then we contacted him with the idea that -- we
8 were sort of going to complain about their, I suppose, the
9 conduct of sort of what we thought was sort of an insult.
10 You know, they were coming out with things that they just
11 couldn't back up, and ---

12 **THE COMMISSIONER:** So they came out in their
13 conversation with you with the suggestion that your late
14 brother was abusing young people. Is that what ---

15 **MR. SEGUIN:** Yeah, I guess that's ---

16 **THE COMMISSIONER:** Well, no ---

17 **MR. SEGUIN:** Well, it was sort of more of a
18 general discussion of what was happening in the area and
19 they were bringing up Milt MacDonald and so on and bringing
20 in Silmsen. So there was an implication that my brother --
21 and ---

22 **THE COMMISSIONER:** An implication of what
23 now?

24 **MR. SEGUIN:** Of sexual abuse.

25 **THE COMMISSIONER:** Okay, okay.

1 **MR. SEGUIN:** And then they brought in the
2 idea of the two tapes that they had found at Ron Leroux's
3 place.

4 **MR. RUEL:** So what did they say about those
5 tapes?

6 **MR. SEGUIN:** Well, they just mentioned that
7 they had, you know, prior investigation into guns, I guess.
8 They had gone to Ron Leroux's place and C-8s and they -- in
9 the process they had found two tapes, and why they would
10 have taken them I don't know, but they did, and they ---

11 **MR. RUEL:** What ---

12 **MR. SEGUIN:** Then later they -- I guess they
13 had asked Ron to come in to pick them up or whatever, and
14 at some point he had said that they were Ken's, not his.

15 **MR. RUEL:** Who's "they said that"?

16 **MR. SEGUIN:** The two policemen: Millar and
17 ---

18 **MR. RUEL:** At some point they said to -- not
19 at that meeting, but ---

20 **MR. SEGUIN:** Yes, ---

21 **MR. RUEL:** --- earlier on?

22 **MR. SEGUIN:** --- yes, at that -- that
23 meeting they were telling us this.

24 **MR. RUEL:** So they said, at that meeting,
25 that those tapes belonged to Ken?

1 **MR. SEGUIN:** They said that Ron Leroux said
2 that.

3 **MR. RUEL:** Okay, I see.

4 So then you went to Inspector Fougere and
5 why did you do that and what did you say?

6 **MR. SEGUIN:** Well, we just thought that
7 there was something -- we -- we just didn't quite grasp the
8 nature of what they were saying, so we went up there to
9 complain about that to -- we thought they had been way too
10 vague and here we are, a week and a half after my brother's
11 death, you know, why are they saying this? So we went up
12 there.

13 When we got there, Fougere mentioned that --
14 I don't know whether to placate us or what or whatever, but
15 he did say that he thought already that David Silmsen could
16 possibly be charged with extortion.

17 **THE COMMISSIONER:** Sir ---

18 **MR. SEGUIN:** Or, at the very least ---

19 **THE COMMISSIONER:** Okay. What I need, you
20 know to -- we're going to go through, I guess, a number of
21 situations that you have some concerns about.

22 **MR. SEGUIN:** Right.

23 **THE COMMISSIONER:** Right. Okay. I need to
24 know -- you say, "We went and seen Inspector Fougere"; who
25 was that?

1 **MR. SEGUIN:** Oh, I see.

2 **THE COMMISSIONER:** So, you know, it's like a
3 breakdown, like a computer, you say, "Okay, this is the
4 event. These are the people. This is what they said.
5 This is what I said; this is the result." Okay.

6 **MR. SEGUIN:** Okay. Well, when I say "we", I
7 believe it was -- I believe it was Keith, Helena and I
8 think my wife Nancy was ---

9 **THE COMMISSIONER:** Was Keith?

10 **MR. SEGUIN:** Keith, yes.

11 **THE COMMISSIONER:** And the second person?

12 **MR. SEGUIN:** Helena.

13 **THE COMMISSIONER:** Helena.

14 **MR. SEGUIN:** Yeah.

15 **THE COMMISSIONER:** Who?

16 **MR. SEGUIN:** And my wife Nancy, I believe.

17 **THE COMMISSIONER:** Helena, what's her last
18 name?

19 **MR. SEGUIN:** Wheeler.

20 **THE COMMISSIONER:** Oh, okay.

21 So where did you go?

22 **MR. SEGUIN:** To Long Sault.

23 We had called before and he had ---

24 **MR. RUEL:** So you brought your, I guess,
25 complaint and then what happened?

1 **MR. SEGUIN:** Well, we didn't really follow
2 up on the complaint at all because then he had mentioned
3 about the possibility of looking into extortion charges
4 against Silmsler and said that they would put someone on it,
5 and he did bring in Inspector Hamelink I believe it was,
6 and -- and he did mention, he said, you know, "You could
7 sue Silmsler for," not -- what is it? When you cause a
8 death of a person; homicide -- it's --

9 **THE COMMISSIONER:** Manslaughter?
10 Involuntary manslaughter or ---

11 **MR. SEGUIN:** No, no, no. I'll think of it
12 later.

13 **MR. RUEL:** Okay. Is it -- then I want to
14 bring you to February, 1994; is it accurate to say that you
15 were interviewed by the OPP on February 3rd, 1994 and
16 that's by Detective Constable Génier and Chris McDonnell; --
17 -

18 **MR. SEGUIN:** Yes, that's correct.

19 **MR. RUEL:** --- do you remember that?

20 **MR. SEGUIN:** Yes.

21 **MR. RUEL:** Do you remember -- I mean, who
22 called -- did you go there by yourself or you were called
23 by the OPP?

24 **MR. SEGUIN:** I think we were called, I
25 believe; I mean they had set it up. They asked my brother

1 Keith and I to make statements.

2 MR. RUEL: Okay. So that's the ---

3 MR. SEGUIN: And that was the time when we
4 gave him the telephone book.

5 MR. RUEL: I see. So I would like to refer
6 you to document number 715290.

7 (SHORT PAUSE/COURTE PAUSE)

8 THE COMMISSIONER: Thank you.

9 Exhibit number 1029 is an interview report
10 of Mr. Doug Seguin at Lancaster -- at the Long Sault
11 Detachment on the 3rd of February, 1994.

12 --- EXHIBIT NO. /PIÈCE NO 1029:

13 (715290) Interview Report - Doug Seguin
14 with OPP D.C. Genier and C. McDonell
15 dated February 3rd, 1994

16 MR. RUEL: Mr. Seguin, have you had the
17 chance -- sorry -- have you had a chance to review this
18 interview report?

19 MR. SEGUIN: No, I don't think so.

20 MR. RUEL: So do you remember giving an
21 interview on ---

22 MR. SEGUIN: Yes.

23 MR. RUEL: --- on February 3rd, 1994?

24 So the context of this is with respect to
25 which aspect of the investigation; was it about your

1 brother's death or was it about the extortion or something
2 else?

3 **MR. SEGUIN:** This -- I think this is more to
4 do -- well, I think both, really. I think it was going
5 into my -- the -- the extortion and the -- and my brother's
6 death.

7 **MR. RUEL:** Okay.

8 **MR. SEGUIN:** --- and I don't quite remember
9 exactly the basis of it but ---

10 **MR. RUEL:** So at page 2, for example, if we
11 can just go through that briefly, page 2, they were asking
12 you some information about Ken:

13 "On average, for example, how often
14 would you see Ken?"

15 You answer them:

16 "For the past six months, at least
17 twice a week."

18 And you indicated:

19 "We'd go see my mother. He would come
20 over for supper so that similar
21 information as..."

22 **MR. SEGUIN:** Yeah, I would have.

23 **MR. RUEL:** So they were asking you, at the
24 middle of the page, about Father Charlie.

25 **MR. SEGUIN:** Okay.

1 **MR. RUEL:** And the following page, similar
2 questions I've asked you:

3 "Who are Ken's closest friends?"

4 So you covered that. You mentioned Don
5 Warden.

6 **MR. SEGUIN:** Yeah, that's right.

7 **MR. RUEL:** Fern Touchette; you've mentioned
8 the Touchettes earlier?

9 **MR. SEGUIN:** M'hm, m'hm.

10 **MR. RUEL:** At the bottom of the page, the
11 question:

12 "As far as you know, have you ever
13 thought your brother would do this?"

14 And you answer:

15 "No, I didn't see it."

16 So what was the -- do you know what the
17 "this" was, what was the reference? I'm trying to -- it's
18 not clear from the transcript, but is it committing
19 suicide?

20 **MR. SEGUIN:** Yes, that -- yeah, that's what
21 I would have been thinking about, at the time. Because,
22 yeah, I was talking to Louise Quinn and she had mentioned
23 to me the -- she thought he also thought that she noticed
24 that he was sort of down and so on.

25 **MR. RUEL:** So the following page, page 4 was

1 a discussion about Silmser.

2 MR. SEGUIN: Where is that now?

3 MR. RUEL: Well, one, two, three, four,
4 five, six -- sixth line.

5 MR. SEGUIN: On page 4?

6 MR. RUEL: Page 4.

7 The question is:

8 "Is there anything else you think we
9 should know, anyone to see?"

10 And then you mention:

11 "Well, Silmser once stole a car when he
12 was a juvenile."

13 MR. SEGUIN: All right. Okay.

14 MR. RUEL: Did you know Mr. Silmser?

15 MR. SEGUIN: No. No, I didn't. I had no
16 knowledge of him before this, at all.

17 MR. RUEL: So you gave some information
18 there; you said:

19 "Who should be talk to?"

20 And then you mention:

21 "Well, he gave a report to Malcolm
22 MacDonald, five or six pages."

23 So are you talking -- are you referring to
24 Ken there?

25 MR. SEGUIN: Yeah, m'hm. That was, yeah.

1 **MR. RUEL:** Did you see that report?

2 **MR. SEGUIN:** Yes, I saw that -- the pages
3 that he had wrote -- written -- my brother had written.

4 **MR. RUEL:** So would it be accurate to say
5 that this is a report of Ken -- that Ken wrote about his
6 dealings with David Silmser?

7 **MR. SEGUIN:** I'm not sure at that -- right
8 at that point where -- whether -- I don't think I -- yeah,
9 it probably came from there.

10 It later on that I -- I had talked to
11 neighbours of David Silmser when he was very, very young,
12 six or seven years old, and they had also -- and someone
13 who lived very close and they had stolen his father's car
14 or whatever, and ---

15 **MR. RUEL:** But you had ---

16 **MR. SEGUIN:** There was a story, but I
17 wouldn't have known that just then.

18 **MR. RUEL:** Okay.

19 **MR. SEGUIN:** So I think I got that from --
20 -

21 **MR. RUEL:** I was asking about a report that
22 was given to Malcolm MacDonald and was asking you did you
23 ever see that report and what did it say?

24 **MR. SEGUIN:** Yeah, I hadn't read it just
25 lately. The -- it just had his contacts with David

1 Silmser. I guess Malcolm had him write up any contacts he
2 had with him.

3 MR. RUEL: So did you see that? Did you see
4 that report?

5 MR. SEGUIN: Yes, yes.

6 MR. RUEL: Who showed it to you?

7 MR. SEGUIN: It was Malcolm. I had heard
8 about it. I'm not sure it was Malcolm or the two
9 policemen, but once I knew about it, I went to Malcolm and
10 asked to see it.

11 MR. RUEL: So in the middle of the page
12 here, the question is:

13 "What would you like the police to do?
14 Are you satisfied it's suicide?"

15 Then you answer:

16 "Yes, I believe it's suicide. I don't
17 think all the family does."

18 So just to stop there, what were you
19 referring to, all?

20 MR. SEGUIN: Well, I think particularly some
21 of my sisters, I don't think -- knowing Ken and so on, they
22 just didn't expect that. So they just thought it was
23 unlikely and -- but that's what I meant by that statement.

24 MR. RUEL: Okay. And then you write or you
25 said:

1 "Personally, I believe Silmsers made up
2 the story. He's capable of it."

3 What -- based on what information did you
4 make that statement?

5 **MR. SEGUIN:** I talked to a Stewart Russo,
6 who actually had Silmsers on ---

7 **MR. RUEL:** Who is Stewart Russo?

8 **MR. SEGUIN:** Well, he's a probationer at --
9 probation officer, retired now. But I went to his home
10 because I was going to the different probationers --
11 probation officers to see what they had to say about all
12 this, and Stewart Russo told me that he was on probation --
13 Silmsers was on probation with him and that he was clever,
14 very manipulative and just not to be trusted. So ---

15 **MR. RUEL:** But you never met -- you never
16 met Silmsers yourself?

17 **MR. SEGUIN:** No, no, never.

18 **MR. RUEL:** And then you ---

19 **THE COMMISSIONER:** I'm sorry. So a
20 probation officer is telling you this, his comments about a
21 former probationer?

22 **MR. SEGUIN:** That's right.

23 **THE COMMISSIONER:** Okay.

24 **MR. SEGUIN:** You don't -- is there a problem
25 there or ---

1 **THE COMMISSIONER:** I wonder what the rights
2 to privacy would say about that. If you had a doctor who
3 was talking to other people about you ---

4 **MR. SEGUIN:** Well, okay, I'm just letting
5 you know what ---

6 **THE COMMISSIONER:** No, no, no, I'm just
7 thinking out loud. Here we go.

8 **MR. NEUBERGER:** The debate about the rights
9 to privacy is a significant debate, but we have this
10 gentleman's evidence as to what his conversation was with
11 Mr. Russo without this Commission having any benefit of
12 what Mr. Russo's evidence is on that point.

13 So I suggest we save the comments about
14 breach of any confidentiality when we have his evidence.

15 **THE COMMISSIONER:** Oh, we are going to have
16 him?

17 **MR. NEUBERGER:** That's up to the Commission,
18 but if a comment is going to be made about a breach of
19 confidentiality by a probation officer, I think it's up to
20 the Commission as to whether they want to call him or not.
21 He's been interviewed and we're prepared, if this is going
22 to become a question.

23 I'm just concerned about comments being made
24 about any individuals who are not being called.

25 **THE COMMISSIONER:** No ---

1 **MR. NEUBERGER:** So ---

2 **THE COMMISSIONER:** Well, what I'm concerned
3 about is if the institutional response is that we have
4 evidence from this gentleman that some other probation
5 officer is saying comments about a former probationer,
6 yeah, I think that would be an issue.

7 **MR. NEUBERGER:** I agree, but I think the
8 debate about what the breach may be is an issue ---

9 **THE COMMISSIONER:** Right.

10 **MR. NEUBERGER:** --- in the abstract at the
11 moment. I understand Mr. Seguin's evidence on that point
12 and I think it becomes a significant point, but I want to
13 be careful as not raising concern about this if nobody
14 calls Stewart Russo to reply to this.

15 **THE COMMISSIONER:** Okay.

16 **MR. NEUBERGER:** Otherwise, it's just simply
17 thinking out loud. It's not a point that can be made
18 against the probation service or Mr. Russo if that evidence
19 isn't sought from him directly.

20 **THE COMMISSIONER:** He would -- no, you're
21 right. I mean, fairness would be that ---

22 **MR. NEUBERGER:** Correct.

23 **THE COMMISSIONER:** --- we put him on the
24 stand and we find out what's going on.

25 **MR. NEUBERGER:** That's why I'm raising at

1 this time if the comment is made on record, I think I have
2 to protect that point.

3 **THE COMMISSIONER:** Fine. Fine.

4 **MR. NEUBERGER:** Thank you.

5 **MR. RUEL:** If I may carry on with this same
6 paragraph, you say or you said:

7 "My knowledge of Ken as a person, his
8 way of life, makes me believe that Ken
9 was not capable of sexually assaulting
10 anyone. That's horseshit..."

11 **MR. SEGUIN:** Yes.

12 **MR. RUEL:** "Read Silmser's statement. He
13 says Ken sexually assaulted him when he
14 found out he was best friends with
15 Father MacDonald."

16 So I guess you didn't believe the
17 allegations?

18 **MR. SEGUIN:** No.

19 **MR. RUEL:** That's pretty clear.

20 **MR. SEGUIN:** Yes.

21 **MR. RUEL:** And did you -- was there any
22 discussion as to the -- pursuing the extortion
23 investigation during that interview?

24 **MR. SEGUIN:** Well, they did, and they -- it
25 was at the end of '94 that they brought us in. Inspector

1 Hamelink brought us in, "us" being my brother and sister,
2 to Long Sault and made a report on it.

3 MR. RUEL: So then you mention at the bottom
4 of the page the issue of the telephone book and that that's
5 when, I guess, you explain how you got the telephone book
6 and you gave it to the police at that point. Would that be
7 accurate?

8 MR. SEGUIN: Yes, that's right.

9 MR. RUEL: You've -- just reading from this,
10 you've talked to a lot of people. You've talked to Stewart
11 Russo. You've talked to Ron Leroux. You talked Gerald
12 Renshaw. You talked to Malcolm MacDonald.

13 So were you carrying some type of, if I can
14 use the term, investigation on your own into the
15 circumstances of your brother's death or any other issue
16 related to Ken?

17 MR. SEGUIN: Well, I was trying to get
18 information to supply my family with some answer as to what
19 could have happened surrounding this, in particular, the --
20 what was said in the media. It's not -- like, to be
21 accused of sexual abuse isn't some small little thing. So
22 you're -- it was pretty important to find out what really
23 happened here, and who is saying what, and could they back
24 it up.

25 MR. RUEL: But let me ask you; do you have

1 any training in interrogation techniques?

2 MR. SEGUIN: No, no.

3 MR. RUEL: Do you have any training as a
4 police officer?

5 MR. SEGUIN: No.

6 MR. RUEL: Anything of that nature?

7 MR. SEGUIN: No, no.

8 MR. RUEL: Mr. Commissioner, just for the
9 record, I think it would be fair to the witness to file the
10 handwritten version of this statement, which is Document
11 715417.

12 THE COMMISSIONER: Thank you.

13 Exhibit 1030 is the handwritten interview
14 report of Doug Seguin with Officer Génier and MacDonald
15 (sic) -- McDonell, sorry, which starts at nine o'clock in
16 the morning and finishes at 11:15.

17 --- EXHIBIT NO./PIÈCE NO. P-1030:

18 (715417) Handwritten interview report
19 of Doug Seguin with Officer Génier and
20 McDonell

21 MR. RUEL: Thank you.

22 Mr. Seguin, is this your handwriting?

23 MR. SEGUIN: No, no ---

24 MR. RUEL: It's not?

25 MR. SEGUIN: Mr. Génier wrote this down.

1 **MR. RUEL:** So the last page seems to be your
2 signature. Can you identify that?

3 **MR. SEGUIN:** Yes.

4 **MR. RUEL:** And there's some initials at the
5 bottom of the pages, D.S.

6 **MR. SEGUIN:** Yes, that's ---

7 **MR. RUEL:** Would that be ---

8 **MR. SEGUIN:** That's mine.

9 **MR. RUEL:** So you've read this?

10 **MR. SEGUIN:** I've ---

11 **MR. RUEL:** You've read this at the time?

12 **MR. SEGUIN:** Yes, I wrote -- yes, I -- they
13 had asked me to read it over and make any changes, which I
14 think I made a couple of changes in it.

15 **MR. RUEL:** Did you ever meet -- I'm going to
16 move to another set of meetings. Did you ever meet OPP
17 officer Tim Smith?

18 **MR. SEGUIN:** Yes. He and I think it was
19 Fagan, came to my wife's and I house and interviewed us,
20 and I don't know the exact date but I think it was actually
21 before they started the actual Project Truth I thought.
22 But they were interested in what we could say -- well, the
23 -- Bishop Larocque, and they told us it wasn't anything to
24 do with my brother so that was -- obviously because he was
25 dead, they couldn't say there was an investigation I

1 suppose.

2 But I think it came about because my wife
3 had talked to Bishop Larocque and gone to see him and talk
4 to him and I think in some conversations on the telephone
5 or Hamelink or whatever, they found out and so they came to
6 talk to mostly her, I guess, about the conversation and so
7 on. And they did talk about Ken's statement to Malcolm
8 there and that's pretty well it I guess.

9 **MR. RUEL:** You've had some -- a number of
10 meetings with Detective Inspector Hamelink?

11 **MR. SEGUIN:** Yes, that's right.

12 **MR. RUEL:** This is related to the extortion
13 investigation ---

14 **MR. SEGUIN:** Yes.

15 **MR. RUEL:** --- against David Silmser?

16 **MR. SEGUIN:** Yeah.

17 **MR. RUEL:** Or concerning David Silmser.
18 Ultimately charges were not laid against Mr. Silmser.

19 **MR. SEGUIN:** No, no.

20 **MR. RUEL:** You were consulted on this?

21 **MR. SEGUIN:** Yes. At the end of '94,
22 members of my family and I went in and had a meeting with
23 Hamelink.

24 **MR. RUEL:** So I just want to show you a
25 document. We're going to go through that briefly.

1 Do you have any issue with this
2 investigation, the way it was conducted?

3 **MR. SEGUIN:** Only that I thought they -- in
4 fact, I asked him, I said, "Did you actually talk to
5 Silmser" and I think they said "No". They might have but I
6 don't know. I thought they really didn't do much
7 investigation of Silmser himself but, in fact, were really
8 looking at my brother's involvement in -- you know, talk to
9 -- I guess he went down to the States to talk to Ron
10 Leroux, and they talked to his friends, and I think Al
11 Laplante and Don Warden and people like that during that
12 time.

13 And, of course, we made our statements, my
14 brother and I, so they were getting around talking to a
15 number of people. I think it was C-8 and Gerry Renshaw I
16 believe as well. So they did talk to quite a few people
17 but it seemed to surround -- the actual focus was more on
18 my brother than it was on Mr. Silmser.

19 **MR. RUEL:** That's your impression?

20 **MR. SEGUIN:** Well, yes, that's ---

21 **MR. RUEL:** How many meetings did you have
22 with them, do you remember? With him -- sorry, Hamelink.

23 **MR. SEGUIN:** Maybe four. I can't quite
24 remember. It was in that one-year period in -- it would be
25 at least four I would think.

1 **MR. RUEL:** I'm just going to show you
2 document 725119.

3 **THE REGISTRAR:** Can you repeat that number?

4 **MR. RUEL:** It's 725119.

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

6 **THE COMMISSIONER:** Thank you. Exhibit
7 Number 1031.

8 What are these, sir?

9 **MR. RUEL:** Those are notes from Detective
10 Inspector Hamelink for the extortion investigation.

11 **THE COMMISSIONER:** All right.

12 **---EXHIBIT NO./ PIÈCE NO P-1031:**

13 (725119) Handwritten notes of Det.

14 Insp. Hamelink dated February 1st, 1994
15 to December 30th, 1994

16 **MR. RUEL:** I just want to show a few
17 excerpts to the witness so to verify if it prompts his
18 memory as to some of the points discussed there.

19 For example, at page -- the notes are
20 numbered -- maybe we could use -- well, I think it's going
21 to be easier to use the Bates pages actually. Page
22 7098222.

23 **THE COMMISSIONER:** So those are the numbers
24 on the top left-hand corner, sir, ---

25 **MR. SEGUIN:** Oh, okay.

1 **THE COMMISSIONER:** --- he's referring to.
2 I'll find it for you and then I'll tell you what page.
3 It's Roman -- not Roman -- number 2. With the 2 right
4 there?

5 **MR. SEGUIN:** Okay. Yes, okay.

6 **THE COMMISSIONER:** Right.

7 **THE COMMISSIONER:** So at 120 it says:

8 "Met with Nancy and Doug Seguin."
9 It gives your address, things like that.

10 **MR. RUEL:** So that's on February 3rd, 1994.

11 There seemed to have been a meeting early in the afternoon
12 with you and Nancy and apparently Keith as well, because
13 it's written in the middle of the page:

14 "Doug and Keith expressed concern about
15 what persons were saying about Ken's
16 sexual preferences in the community."

17 Do you remember that?

18 **MR. SEGUIN:** Can you give me that number
19 again? Is it 220?

20 **THE COMMISSIONER:** No.

21 **MR. SEGUIN:** No.

22 **THE COMMISSIONER:** There's a page missing?

23 **MR. SEGUIN:** Okay.

24 **MR. RUEL:** So "Doug" -- that's the middle of
25 the page:

1 "Doug and Keith expressed concern about
2 what persons were saying about Ken's
3 sexual preferences in the community?

4 Do you remember that?

5 **MR. SEGUIN:** Yes.

6 **MR. RUEL:** Saying that to the ---

7 **MR. SEGUIN:** Okay. Right.

8 **MR. RUEL:** So you do remember?

9 **MR. SEGUIN:** Yes, okay, I remember the ---

10 **MR. RUEL:** Okay. Then at page 7098232.

11 **THE COMMISSIONER:** Which would be number 8
12 in the middle there.

13 **MR. SEGUIN:** Okay.

14 **MR. RUEL:** So that's April 13th, 1994:

15 "Spoke with Doug Seguin at 16:55.

16 Spoke with Doug Seguin. He actually
17 talked about nothing to do with his
18 brother's sexuality [I believe].

19 Doesn't believe it's true, re: Silmsers
20 allegation."

21 Do you remember that?

22 **MR. SEGUIN:** Yes, yes, okay.

23 **MR. RUEL:** So, again, you were saying the
24 same thing about Silmsers that you ---

25 **MR. SEGUIN:** That's right.

1 **MR. RUEL:** --- that you talked about before?

2 **MR. SEGUIN:** Yes.

3 **MR. RUEL:** The next page, in the middle of
4 the page:

5 "Doug Seguin also didn't believe the
6 allegation by Silmsen against Father
7 Charlie."

8 You said that?

9 **MR. SEGUIN:** Yeah, I believe so, right.
10 They were asking me, yeah, what I thought.

11 **MR. RUEL:** Then you made reference to a
12 complaint about Charlie Greenwell?

13 **MR. SEGUIN:** Yes, okay.

14 **MR. RUEL:** Then you mentioned he felt Tim
15 Smith, or T. Smith, may have a slanted view regarding the
16 sexual assault investigation because of comments he made.
17 Do you remember saying that? Tim Smith having a slanted
18 view?

19 **MR. SEGUIN:** Okay, well, I don't know that I
20 used those terms, but I think I was explaining to them when
21 I was talking, when they came to the house. Tim Smith
22 showed us the -- or mentioned the statement by Ken to
23 Malcolm and said that we believe that this statement is
24 false or whatever and so I questioned them. I read it
25 myself so -- and I ---

1 **THE COMMISSIONER:** Is that statement in
2 evidence?

3 **MR. RUEL:** I believe that's the -- yes, I
4 believe so. That's the statement given by ---

5 **MR. SEGUIN:** Silmser, my brother to Malcolm,
6 right?

7 **MR. RUEL:** Yes, I think, I believe it is
8 yes.

9 **THE COMMISSIONER:** Well, maybe at the break
10 or sometime you could refresh my memory as to what the
11 exhibit number is. It's not necessary now, I just need to
12 have ---

13 **MR. RUEL:** I believe that we have three
14 statements actually. Exhibit 960, 961, 962.

15 **THE COMMISSIONER:** Yes, okay.

16 **MR. RUEL:** So, Mr. Seguin, those are
17 statements we understand that were given to ---

18 **MR. SEGUIN:** Yes. Yes.

19 **MR. RUEL:** --- your brother to Malcolm
20 MacDonald. Are those, do you remember -- have you seen
21 those documents?

22 **MR. SEGUIN:** Yes, yes, I have seen them.

23 **MR. RUEL:** All of them?

24 **MR. SEGUIN:** Well, there were -- I think
25 there was a brief one and then this one.

1 **MR. RUEL:** So what was the discussion with
2 Mr. Smith?

3 **MR. SEGUIN:** Mr. Smith, well he ---

4 **MR. RUEL:** --- statements ---

5 **MR. SEGUIN:** Yeah, he just said that he
6 thought that they were not true or what he was saying was -
7 - and so I said, "Well, what would you give that
8 impression?" Because I had read it and I could see nothing
9 that was, you know, out of the ordinary.

10 So he said, well, that he had -- they had
11 sent it to some psychologists in Toronto or whatever and
12 they -- that was their -- what they thought and so I
13 thought -- I was so -- I just thought what nonsense. So I
14 asked for their names and I was going to -- I said I'd like
15 to talk to them to find out exactly why they would say
16 that. I mean they, obviously, if that was true they would
17 have had to have had some really deep knowledge of how
18 people write and all the rest of it and I thought, geez,
19 I'd like to hear what they would say about that.

20 And because when I wrote it, I could, you
21 know, I'm not an expert on that, but I'd like to know about
22 it, understand it, so -- but he just said oh, oh, no, I
23 don't have the names or whatever and ---

24 **MR. RUEL:** In those statements, I gather
25 that your brother was not making any admission of wrong

1 doing towards Silmsler?

2 MR. SEGUIN: No. No.

3 MR. RUEL: But would you not agree that the
4 police, and in this case the OPP, I mean, they would
5 presumably speak to many people about the allegations. I
6 mean, would you agree with that?

7 If you were investigating to some point, I
8 mean they were speaking to people.

9 MR. SEGUIN: Yes. That's correct.

10 MR. RUEL: So they were getting information
11 from sources. So did you know all of the information they
12 were getting from people about your brother?

13 MR. SEGUIN: No, and from what I gathered,
14 but at that point I probably knew more than they did, you
15 know, from the people that I was talking to. And, in fact,
16 by that time they -- I don't think they had any.

17 By '90, at the end of '94, Hamelink
18 mentioned that even though they talked to a lot of people,
19 up to that point the only real complaint was from Albert
20 Roy and they didn't have anything else.

21 MR. RUEL: I'm coming back to the notes of
22 Detective Inspector Hamelink, page 35 circled at the top of
23 the page, which is Bates page 7098286.

24 It's December; it's a meeting that in the
25 notes -- December 29th, 1994 and Detective Inspector

1 Hamelink writes:

2 "Attended Long Sault for a meeting with
3 Doug Seguin, which had been previously
4 arranged. When this meeting was
5 arranged last week, I expressed the
6 Crown's opinion to Seguin regarding the
7 lack of evidence to pursue charges
8 against Silmser for extortion."

9 So he's referring to an earlier discussion, I would assume,
10 and then he met with you, Keith and Hilda. Is that
11 possible?

12 **MR. SEGUIN:** Yes, that's right.

13 **MR. RUEL:** Who is Hilda?

14 **MR. SEGUIN:** My brother Keith's wife.

15 **MR. RUEL:** Oh, I see. And then they were
16 collectively advised that it was the opinion of the
17 Director of Crown Griffiths that there were no grounds to
18 extortion. I mean, there's words missing, but extortion
19 against Silmser, so I guess they were -- he was telling you
20 that ---

21 **MR. SEGUIN:** Yeah.

22 **MR. RUEL:** --- that he had received an
23 opinion and there was no grounds to lay charges against
24 Silmser?

25 **MR. SEGUIN:** That's right.

1 **MR. RUEL:** Is that accurate?

2 **MR. SEGUIN:** Yeah, that's -- they had
3 mentioned that, but they already also mentioned sort of why
4 that was the case and I think at that time they found --
5 or that sort of time they decided maybe to look into or
6 charge Malcolm MacDonald having to do with the \$32,000
7 settlement.

8 **MR. RUEL:** So did you accept that? How did
9 you react to Mr. Hamelink's comments that they were not
10 going to pursue this?

11 **MR. SEGUIN:** Well I thought -- I think I
12 probably mentioned my displeasure at that because I thought
13 it should have been the case, but there was nothing -- you
14 can't go any further if they decide not to.

15 **MR. RUEL:** If you can go to page -- the
16 Bates page, so that's in on the left, top-left corner,
17 7098289.

18 At the bottom of the page as it's written in
19 the notes:

20 "I advise them that my investigation
21 was closed. Until other new evidence
22 surfaces, it would remain closed.
23 Keith Seguin wants the entire matter
24 stopped as he felt it would serve no
25 useful purpose and it may ..."

1 I can't read the next three words. I gather
2 he was saying that it would put through -- having to go
3 through this would be difficult for the family according to
4 Keith Seguin, and then it's written:

5 "Doug or Helena did not indicate the
6 same feeling as Keith did over the
7 matter, rumours, media, et cetera."

8 So is that your recollection? Some
9 discrepancy in the family as to how the authorities were to
10 proceed with those ---

11 **MR. SEGUIN:** Well ---

12 **MR. RUEL:** --- this investigation?

13 **MR. SEGUIN:** Well, as an investigation, it
14 was over as far as this was as they told us.

15 But it was becoming tough on the family
16 members and some -- I think Keith just showed that he was
17 sort of fed up with the thing up to that point and would
18 rather it sort of just -- at that point, just sort of go
19 away. But I'm sure that was a momentary frustration on his
20 part.

21 **MR. RUEL:** So did you accept the -- what
22 Detective Inspector Hamelink told you in terms of not
23 pursuing this matter or did you challenge it?

24 **MR. SEGUIN:** Only in -- I think he had at
25 one time said that we could look at anything they had

1 found, you know, statements and so on. We just assumed he
2 meant that we could look at all of the information that he
3 had gathered since there was going to be another
4 investigation into Malcolm MacDonald and so on. Obviously,
5 he would say no, but perhaps I didn't quite grasp that
6 point and I was a little irritated by the fact that he
7 wouldn't allow us to see some of the statements.

8 MR. RUEL: What do you mean? You wanted to
9 see statements from ---

10 MR. SEGUIN: Well ---

11 MR. RUEL: Which statements?

12 MR. SEGUIN: Well, I think he had statements
13 from C-8 and Albert Roy and that ---

14 MR. RUEL: But why would they show that to
15 you? I mean ---

16 MR. SEGUIN: Well, that's what I'm saying; I
17 probably was somewhat out of line there in -- it's just
18 that he had promised that.

19 MR. RUEL: Oh, he had promised that?

20 MR. SEGUIN: That's right. He had mentioned
21 to us that he would do that. And when he didn't, then it's
22 ---

23 MR. RUEL: You are aware that an
24 investigation took place here in Cornwall, the Project
25 Truth investigation, the OPP investigation?

1 MR. SEGUIN: Yes.

2 MR. RUEL: You're aware of that?

3 MR. SEGUIN: Yes.

4 MR. RUEL: Did you have discussions,
5 meetings, with Project Truth members, including Pat Hall,
6 Don Genier or others?

7 MR. SEGUIN: Except for Tim Smith and Fagan
8 that time, I don't -- I actually can't remember at this
9 time.

10 MR. RUEL: Not at this time, but through the
11 years, I guess?

12 MR. SEGUIN: Yeah, well, through the years I
13 don't think we really had much contact with them, but I
14 can't jus remember. If you have something, you just let me
15 know, but at the moment I don't remember much of any
16 contact except I did call Patrick Hall up in I think it was
17 '99 probably, yeah. I was working out of Port Hope at that
18 time and there was an article in the newspaper, the Toronto
19 Sun, and I was talking to the managing editor of the
20 Toronto Sun about the article and I was telling him that he
21 really did have incorrect information in there.

22 MR. RUEL: So the article was about ---

23 MR. SEGUIN: Well ---

24 MR. RUEL: Did it mention Ken?

25 MR. SEGUIN: Yes, it did.

1 **MR. RUEL:** What did it say?

2 **MR. SEGUIN:** And I think it was a quote by
3 Guzzo, I think it was, and it said something like, "He was
4 down here in Family Court, and he was very shocked to hear
5 that he might have been sending kids from the court into
6 the hands of certain" -- you know, into the hands of ---

7 **MR. RUEL:** Probation officers?

8 **MR. SEGUIN:** Right. M'hm. At that time
9 there was some other things, but I just can't remember. I
10 think there was -- in that article there was something
11 about a murder actually happening at my brother's, and
12 guns, and things like that. You just got things all mixed
13 up. So I -- when I was talking to this -- I'm not sure if
14 it was Snoblen or I forget exactly his name, but he -- I
15 said, "Well, why don't you call Patrick Hall and find out?"
16 And, you know, I gave him the telephone number because I
17 knew the Project Truth phone number.

18 A little later that day, I think I called
19 Patrick Hall and I said -- I was talking about this
20 particular -- I was wondering, well, where would he get
21 information like that. And he said, "Well, he didn't get
22 it from us because it's wrong." But he mentioned something
23 about -- he said, you know, something about 22 tapes or
24 that type of thing, and I thought to myself, "Now, I didn't
25 hear that." That's the first time I ever heard that. And

1 I thought I had known about the two tapes from Millar and
2 Chris McDonell, but I never heard these tapes.

3 So I asked -- you know, I asked him about
4 this, "Are you really sure of that?" Because in the back
5 of my mind, I already knew that -- well, no one had
6 mentioned that and certainly the police had never mentioned
7 extra. So I didn't actually say any more about it. I just
8 left it at that, and he must have gotten in contact with
9 his own -- you know, maybe with Millar and Chris McDonell
10 to find out the truth.

11 But at any rate, this Toronto manager of the
12 Sun, he called back and he said, "Yeah, you're right; this
13 isn't true." And then he added that the truth is -- the
14 facts are moot to the story, which I thought was pretty
15 wild thing to say. And they never -- they didn't change
16 anything.

17 **MR. RUEL:** So essentially what you're saying
18 is that when you -- correct me if I'm wrong, when you were
19 hearing or reading about information you thought was not
20 accurate concerning your brother, you would go to the
21 authorities to make sure this ---

22 **MR. SEGUIN:** Yeah, I ---

23 **MR. RUEL:** --- the information be verified
24 and ---

25 **MR. SEGUIN:** Right.

1 **MR. RUEL:** --- that the journalist in this
2 case would report information that was accurate?

3 **MR. SEGUIN:** Right.

4 **MR. RUEL:** So that was your purpose?

5 **MR. SEGUIN:** That's my, yeah, purpose.
6 That's right.

7 **MR. RUEL:** Okay. Thank you.

8 **MR. RUEL:** And you -- is it accurate to say
9 that you were interviewed at your workplace by the --
10 Detective Constable Seguin at some point ---

11 **MR. SEGUIN:** That's right.

12 **MR. RUEL:** --- concerning one of your former
13 coworkers ---

14 **MR. SEGUIN:** Yes.

15 **MR. RUEL:** --- of an allegation?

16 **MR. SEGUIN:** There was -- in between -- I
17 think -- let's see -- I think I had -- well, let's see, I
18 had gone to Europe, I guess, a young person, and I'd come
19 back, and I think that was -- and I needed a job just
20 January through August or whatever before I went back to
21 school, and I got a job with the Youth Centre in Cornwall.
22 I think back then you didn't need to have any training or
23 whatever. And so I knew Brian Dufour. I worked with him.
24 And I think it was -- I'm not sure if there's a moniker on
25 this fellow, but ---

1 **THE COMMISSIONER:** You have the monikers'
2 list, do you?

3 **MR. SEGUIN:** No, I haven't.

4 **THE COMMISSIONER:** No, you wouldn't. That's
5 right. Sorry.

6 He shouldn't have it?

7 **MR. RUEL:** I don't there is. He's not ---

8 **THE COMMISSIONER:** No, he shouldn't really
9 because then he'll see all the other names.

10 So why don't you write down the name and
11 then show it to Mr. Ruel.

12 **MR. RUEL:** I know the name. I don't think
13 there's a moniker, but the person is being investigated as
14 a possible ---

15 **MR. SEGUIN:** Well, Brian -- yeah, Brian
16 Dufour, but that's not the one. I'm thinking of the person
17 who's making the accusations.

18 **MR. RUEL:** No, no, I'm talking about the
19 person who was your co-worker.

20 **MR. SEGUIN:** Yeah.

21 **MR. RUEL:** So essentially they were
22 investigating one of your co-workers ---

23 **MR. SEGUIN:** Yes. Correct.

24 **MR. RUEL:** --- and they came to see you?

25 **MR. SEGUIN:** Yes.

1 MR. RUEL: And you were interviewed?

2 MR. SEGUIN: M'hm.

3 MR. RUEL: And essentially you didn't have
4 anything of interest to them to report about this person in
5 terms of ---

6 MR. SEGUIN: No, I could ---

7 MR. RUEL: --- allegations of misconduct
8 that this person may have been involved in?

9 MR. SEGUIN: No, I didn't have anything to -
10 - there was nothing I could see.

11 MR. RUEL: So I want to talk to you about
12 now some of the complaints you've made concerning the
13 media.

14 Do you remember a broadcast made on January
15 5, 1994 ---

16 MR. SEGUIN: That's correct.

17 MR. RUEL: --- and it was Charlie Greenwell
18 on CJOH?

19 MR. SEGUIN: That's correct.

20 MR. RUEL: So that's television in Ottawa?

21 MR. SEGUIN: Yes.

22 MR. RUEL: It's a television station.

23 MR. SEGUIN: M'hm.

24 MR. RUEL: And did you remember -- well,
25 first of all, Mr. Greenwell, you had discussions with him

1 prior to the broadcast; is that correct?

2 MR. SEGUIN: Yes.

3 And on -- the evening before.

4 MR. RUEL: Okay. He called you or you
5 called him?

6 MR. SEGUIN: No, he called me, around ten
7 o'clock in the evening I think it was.

8 And really what I think he was thinking he
9 was going to be talking to my sister-in-law but they were
10 away and so he got a hold of me and I think he was referred
11 to, I think he said by -- he was talking to someone in the
12 -- probation officer, but any rate ---

13 MR. RUEL: So what did he say?

14 MR. SEGUIN: Well, after introducing himself
15 and said -- saying this was off the record, he then talked
16 about Ken and that there were allegations and, you know,
17 and, of course, we hadn't -- didn't know anything specific
18 by that time except the vague notion from Chris McDonell
19 and -- and Millar.

20 So anyways ---

21 MR. RUEL: What did you mean the "vague
22 notion"; what are you referring to?

23 MR. SEGUIN: Well, as I mentioned that
24 before that it was -- and that's what we had complained
25 about, about that conversation in December ---

1 **MR. RUEL:** I see. Okay.

2 **MR. SEGUIN:** Okay, we went through that.

3 The ---

4 **THE COMMISSIONER:** You're with Mr.
5 Greenwell. He's talking to you.

6 **MR. SEGUIN:** Yes, okay. See the ---

7 **THE COMMISSIONER:** Yes? So it's off the
8 record?

9 **MR. SEGUIN:** Yes, yes. Okay.

10 And he started into talking about that there
11 was a statement out there by someone and that if -- and did
12 I know that the fellow had recanted the -- these
13 allegations?

14 **MR. RUEL:** I'm sorry, "this fellow", you
15 mean is this ---

16 **MR. SEGUIN:** David Silmser, sorry.

17 **MR. RUEL:** So did he say he had a statement
18 -- he told you he had a statement?

19 **MR. SEGUIN:** Yeah -- well, what -- yes, he -
20 - at the end he did say he was getting a statement.

21 And -- and I think that was -- there was
22 something about -- you see, a newspaper's in -- they or
23 even any journalist, I think when they're going to come out
24 with something, they always make sure that they have
25 another organization or something to come out with the same

1 thing and it's sort of lends credence to the story, so he
2 had mentioned that he had sent the statement to the Ottawa
3 Sun people but I think it was Jackie Leroux, I think it
4 was, and then he -- and then he was getting it back.

5 Now I -- I had three conversations with him
6 and I -- right at the moment I'm trying to -- exactly which
7 -- what was what and what conversation.

8 **MR. RUEL:** Let me just to help you: Was
9 there an allegation -- did he mention an allegation against
10 your brother in that statement?

11 **MR. SEGUIN:** Yes, yes he did; that's why he
12 was calling, right.

13 **MR. RUEL:** Okay. And he mentioned -- you
14 talked about "recanting"; did he use those terms? He said
15 ---

16 **MR. SEGUIN:** Well, that's ---

17 **MR. RUEL:** --- "Silmser recanted his
18 allegation against ---

19 **MR. SEGUIN:** That's what told ---

20 **MR. RUEL:** --- against Ken." Is that what
21 he said to you?

22 **MR. SEGUIN:** That's what he said.

23 **MR. RUEL:** Or that's what you understood?

24 **MR. SEGUIN:** Well, that's what I heard and
25 my wife was upstairs; she was on the -- 'cause we knew that

1 this was coming in, she was listening on the telephone
2 upstairs, so...

3 **MR. RUEL:** And then what happened; how did
4 you react?

5 **MR. SEGUIN:** Well, I just said, "Well, I
6 suppose that's true," you know, that he -- if things were
7 being alleged and then they were -- it was gone, then
8 perhaps that's, you know.

9 But that's -- so, yeah, what -- what's the
10 next question do you...

11 **MR. RUEL:** Well, I was just wondering what
12 you replied.

13 **MR. SEGUIN:** Oh yeah, well, it's just that -
14 - I just said, "Well, I," you know, "I suppose that's
15 possibly true."

16 **MR. RUEL:** And did he mention the source;
17 where he obtained the statement or who he obtained the
18 statement from?

19 **MR. SEGUIN:** Yes, it was -- now, I'm not
20 sure if it was the first conversation or the next but, in
21 any case, I was sort of pressing him for how he could
22 verify this and -- and what statement is he talking about
23 and that type of thing and, yeah, he did mention that he
24 was receiving a statement and I said, "Well, where are
25 getting it," that type of thing.

1 And, yeah, he did say he was getting it from
2 a good source; it was a Cornwall police officer and so
3 that's why he was accepting it.

4 **MR. RUEL:** Did he mention the name?

5 **MR. SEGUIN:** No, he didn't.

6 **MR. RUEL:** And did you have other
7 conversations with Mr. Greenwell before the broadcast?

8 **MR. SEGUIN:** Yes, that -- let's see, that
9 night he called -- oh, he had mentioned that if I wanted to
10 know about these recantations, that I should call Chief
11 Shaver and he gave me his telephone number.

12 And so I -- I think right after that I did
13 call Shaver and asked him about that and I think he ---

14 **MR. RUEL:** Sorry, when was that: That same
15 day or ---

16 **MR. SEGUIN:** Yeah, that same night. I think
17 it was just an hour -- within an hour after I had ---

18 **MR. RUEL:** So you called Chief Shaver.

19 **MR. SEGUIN:** Yes.

20 **MR. RUEL:** You reached him?

21 **MR. SEGUIN:** M'hm.

22 And I -- see, I believe that's -- I know I
23 called that night and then I called Greenwell back after I
24 had, and funny thing is told me he had called -- after
25 talking to me he had called Shaver and also -- now, I

1 really didn't know what -- I didn't really ask him, I don't
2 think, did he not know -- did this recantation, was it
3 something he knew by talking to Shaver before or was he
4 just telling it and then he went and verified it with
5 Shaver afterwards, I don't know.

6 But anyway, he told me that after he had
7 talked to me, then he went to Shaver, found out that was
8 the case and then when I called him ---

9 MR. RUEL: When you say "the case", it was
10 according to you Shaver had confirmed ---

11 MR. SEGUIN: Yes, yes.

12 MR. RUEL: --- Mr. Greenwell that ---

13 MR. SEGUIN: Yes, yes.

14 MR. RUEL: --- Silmsen had recanted?

15 MR. SEGUIN: Yes, that's right.

16 MR. RUEL: That's your understanding?

17 MR. SEGUIN: Yes.

18 MR. RUEL: Okay. And that's the second
19 conversation you had ---

20 MR. SEGUIN: Yes, that's the second one,
21 right.

22 MR. RUEL: So you talked about the
23 conversation you had with Chief Shaver?

24 MR. SEGUIN: Yeah, I believe ---

25 MR. RUEL: The same day, you believe?

1 **MR. SEGUIN:** I think it was the same day.

2 **MR. RUEL:** Okay. What did you discuss with
3 Chief Shaver?

4 **MR. SEGUIN:** Right at the moment, you see I
5 can't remember if I called Shaver that night or was it that
6 Greenwell told me that he had called that night, but at --
7 right at the moment I'm not quite sure of that.

8 **MR. RUEL:** But did you speak with Chief
9 Shaver?

10 **MR. SEGUIN:** Yes, I did; later on I -- I ---

11 **MR. RUEL:** Okay. But you don't recall
12 exactly when?

13 **MR. SEGUIN:** No, ---

14 **MR. RUEL:** But you spoke to Chief Shaver?

15 **MR. SEGUIN:** Not at that first time; I just
16 can't remember it at the moment.

17 **MR. RUEL:** Okay. But I just want to confirm
18 this; you did speak to Chief Shaver; that's what you're
19 saying?

20 **MR. SEGUIN:** Yes, I eventually did -- well,
21 not -- see, I can't remember exactly if it was that night,
22 because I was -- there were two or three conversations
23 there and I sort of -- I'm not sure whether it was
24 Greenwell told me that he called Shaver or whether -- you
25 see, he told me to call Shaver but I'm not sure that I did

1 it that night.

2 **MR. RUEL:** Okay, but ---

3 **MR. SEGUIN:** You would have to ask Shaver.

4 **MR. RUEL:** That's fine, but I'm just asking
5 you: Did you speak to Mr. Shaver eventually?

6 **MR. SEGUIN:** Yes.

7 **MR. RUEL:** Okay. So what did you discuss?

8 **MR. SEGUIN:** Well, I asked him to -- could I
9 go and see him.

10 And then I had gone to his place and ---

11 **MR. RUEL:** To his place; to his home or ---

12 **MR. SEGUIN:** Yes, his home ---

13 **MR. RUEL:** --- to the office?

14 **MR. SEGUIN:** --- his home.

15 And I think I showed him the -- the
16 statement. I only -- Greenwell had sent me a part of the
17 statement, just one page, and I think I took that and I --
18 we discussed -- but he wouldn't have known who I was, so
19 even though I talked to him on the telephone, so I
20 introduced myself and -- and just said who I was.

21 And he, of course, was sorry, his death, and
22 so on and said he was a good probation officer, that type
23 of thing.

24 And then we went into talking about really
25 what was said in the -- the media at that time, not only

1 CJOH but CJSS.

2 MR. RUEL: Okay. But what did he tell you?
3 I mean, did you learn anything from that meeting?

4 MR. SEGUIN: Well, yes, I did. I found out
5 that CJSS had their broadcast they had written out and, of
6 course, it mentioned the place, the wrong place, and so on
7 of where my brother died, that type of thing, and he had a
8 copy of their broadcast type thing, the original. I guess
9 he had gone down and talked to them about it, maybe told
10 them that they were wrong in their facts and he had gotten
11 that page.

12 MR. RUEL: But did you discuss the actual
13 statement, the investigation of that complaint, of David
14 Silmsen's complaint, the allegation against your brother?
15 Did you discuss that with Chief Shaver, and if so, what was
16 said ---

17 MR. SEGUIN: Well, he ---

18 MR. RUEL: --- by you and him?

19 MR. SEGUIN: Well, I would have discussed
20 it, but I don't think he could -- he really couldn't say a
21 lot about any investigation, whether even -- I think I even
22 by that time sort of -- I think this was -- I waited awhile
23 I think before I actually did go to see him the first time,
24 and he -- I think by that time I knew the name Perry
25 Dunlop. I asked about it but he just said he couldn't.

1 Because I remember he couldn't elaborate, you know, because
2 it had been or it was, I guess, under investigation, that
3 type of thing.

4 **MR. RUEL:** So you didn't learn much from ---

5 **MR. SEGUIN:** No, not ---

6 **MR. RUEL:** --- Chief Shaver?

7 **MR. SEGUIN:** No, not given ---

8 **MR. RUEL:** Okay. So the broadcast was on
9 January 5. So what did you remember from that broadcast?

10 **MR. SEGUIN:** Well, that it had the statement
11 on it and ---

12 **MR. RUEL:** The statement was posted?

13 **MR. SEGUIN:** Yes.

14 **MR. RUEL:** On television?

15 **MR. SEGUIN:** Yes, that's right.

16 And then it had a picture of my brother, a
17 picture of Father Charles MacDonald and I think a picture
18 of St. Andrews Church, and then there was a picture of
19 probation officers and it -- I think I -- it's something
20 about juveniles or whatever and I questioned him about --
21 no, or I thought that -- because I didn't think Ken dealt
22 with juveniles, so I was wondering about that point.

23 Yeah, there were a number of things that I
24 had to remember having to go out to my mother's because she
25 was alone and she always watched the -- that CJOH news, so

1 I ran out there and just told her beforehand and then she
2 heard this and ---

3 **THE COMMISSIONER:** So what's your complaint
4 with the media? What's your concern about that show?

5 **MR. SEGUIN:** Well, it was putting the
6 statement out as fact and the way they said it I believe --
7 you know, this happened and that.

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

9 **MR. SEGUIN:** And we hadn't heard it before
10 and I just didn't think there was any -- it wasn't
11 substantiated, anything like this at all.

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

13 **MR. SEGUIN:** And so that's why I phoned them
14 back and found out, you know, more about it. It was just a
15 -- we thought it was very unbalanced and not fair at all.

16 **MR. RUEL:** Let me take you -- Mr.
17 Commissioner, I think that will assist you in understanding
18 this.

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

20 **MR. RUEL:** This is document 124215.

21 **THE COMMISSIONER:** Thank you. This is --
22 Exhibit 1032 is a faxed message from Doug Seguin -- Douglas
23 Seguin to the CRTC, all right, and -- I'm sorry; dated
24 January 26th, 1994.

25 ---EXHIBIT NO./ PIÈCE NO P-1032:

1 (124215) Fax message from Douglas
2 Seguin to CRTC dated January 26th, 1994
3 All right. So you did file a broadcast
4 complaint?

5 **MR. RUEL:** So, Mr. Seguin, do you remember
6 those -- again, the versions we have are not signed, but do
7 you remember ---

8 **MR. SEGUIN:** Yeah.

9 **MR. RUEL:** --- sending to the CRTC ---

10 **MR. SEGUIN:** Yes, I did.

11 **MR. RUEL:** --- which is ---

12 **MR. SEGUIN:** Canadian Radio and Television -
13 --

14 **MR. RUEL:** Yes.

15 **MR. SEGUIN:** --- Commission.

16 **MR. RUEL:** Which, just for the record,
17 Canadian Radio and Telecommunications Commission, CRTC,
18 which is the federal regulator of radio and television
19 essentially.

20 And you remember sending those complaints to
21 the CRTC?

22 **MR. SEGUIN:** Yes, that's right.

23 **MR. RUEL:** Okay. So there is one with
24 respect to CJOH and Charlie Greenwell?

25 **MR. SEGUIN:** Right.

1 **MR. RUEL:** And another one with respect to
2 CJSS radio?

3 **MR. SEGUIN:** Yes, that's right.

4 **MR. RUEL:** And to understand the nature of
5 your complaint, there is a general letter to Mr. Darling,
6 who is the -- or was the Secretary General of the CRTC.
7 And then the second, I guess -- the third page is a formal
8 complaint or the complaint against CJOH, and then you refer
9 in that document -- the complaint deals with the
10 programming content of the CJOH T.V. news broadcast of
11 January 5, 1994:

12 "One, the CJOH T.V. news broadcast made
13 false and misleading statements and
14 made use of video portions that mislead
15 viewers concerning my recently deceased
16 brother's professional and sexual
17 conduct, and the false and misleading
18 statements were made in full knowledge
19 of the withdrawal of the allegations by
20 the complainant and the devastating
21 affect that the unjustified use of my
22 brother's name would have on my brother
23 and grieving family, as well as a large
24 number of friends and neighbours who
25 regularly watch the CJOH news

1 broadcast."

2 So am I right to understand that the main
3 concern was that you thought that the statements, as they
4 related to your brother, were false, considering your
5 understanding that Silmsen had withdrawn ---

6 **MR. SEGUIN:** Yeah.

7 **MR. RUEL:** Withdrawn his allegation. That's
8 essentially the thrust of your complaint, isn't it?

9 **MR. SEGUIN:** Well, I wouldn't say it's -- I
10 just -- that would be part of it, but I think the -- it's
11 just that the way they went about it as well.

12 **THE COMMISSIONER:** Who's "they"?

13 **MR. SEGUIN:** Sorry, the -- well, Greenwell
14 and the CJOH.

15 The way they went about it was quite
16 misleading and it looked like, you know, they had made up
17 their minds and ---

18 **MR. RUEL:** So that's ---

19 **MR. SEGUIN:** Yes, yes.

20 **MR. RUEL:** That's your complaint ---

21 **MR. SEGUIN:** Right.

22 **MR. RUEL:** --- that the broadcast was biased

23 ---

24 **MR. SEGUIN:** Yes.

25 **MR. RUEL:** --- and unfounded ---

1 **MR. SEGUIN:** That's right.

2 **MR. RUEL:** --- since the complainant had
3 recanted, essentially?

4 **MR. SEGUIN:** Yes, that would be part of it,
5 yeah.

6 **MR. RUEL:** According to you?

7 **MR. SEGUIN:** Yes. Well, according to
8 Greenwell too.

9 **MR. RUEL:** And then the second complaint is
10 with respect to CJSS?

11 **MR. SEGUIN:** That's right.

12 **MR. RUEL:** And that's the -- well, the
13 following complaint. Yes, and Madam Clerk, thank you.

14 The complaint deals with the programming
15 content of the CJSS radio news broadcast of January 6th and
16 7th. So following the initial broadcast ---

17 **MR. SEGUIN:** M'hm.

18 **MR. RUEL:** --- of CJOH.

19 "One, CJSS radio station broadcast made
20 a false and misleading statement
21 concerning the location of my brother's
22 recent death. The broadcast gave false
23 information that my brother, probation
24 officer, was jailed, was guilty of
25 sexual assault and died in jail. Two,

1 the CJSS radio also broadcast false,
2 misleading, unfounded and abusive
3 statements that accused my brother of
4 taking part in sexual acts with young
5 boys while boating on the St. Lawrence
6 River."

7 So you -- essentially the substance of your
8 concerns, I guess, were with respect to those two points
9 which were inaccurate ---

10 MR. SEGUIN: Yes, that's right.

11 MR. RUEL: --- in your view?

12 MR. SEGUIN: M'hm.

13 MR. RUEL: So you got a reply from CJOH. Do
14 you remember that?

15 MR. SEGUIN: After CRTC?

16 R. RUEL: After the complaint to the CRTC.

17 MR. SEGUIN: Yes, I believe so. I haven't
18 read it for a while but ---

19 MR. RUEL: You've had many letters back and
20 forth with the CRTC; I won't file each of them. I'll try
21 and go to the essential ones. So you got a letter which is
22 document 124204.

23 (SHORT PAUSE / PAUSE COURT)

24 THE COMMISSIONER: Thank you. Exhibit
25 Number 1033 is a letter addressed to Mr. Douglas Seguin

1 dated 14th February 1994 from Mr. A.D. MacKay, Vice
2 President and Station Manager of CJOH, I guess. Yes.

3 ---EXHIBIT NO./PIECE NO. 1033

4 (124204) Letter from A.D. MacKay to
5 Douglas Seguin dated February 14th, 1994

6 MR. RUEL: So just -- do you remember
7 receiving that letter, Mr. Seguin?

8 MR. SEGUIN: Yes, m'hm.

9 MR. RUEL: So just to go through some of the
10 paragraphs to situate the context.

11 At the bottom of the first page and this
12 A.D. MacKay, Vice President and Station Manager of CJOH,
13 and he was writing, at the bottom of the page:

14 "In the early part of that month our
15 reporter, Charles Greenwell, received
16 information from a source which
17 appeared to be a creditable source
18 regarding a police investigation,
19 Cornwall, of allegations of sexual
20 abuse. The information presented to
21 Mr. Greenwell indicated that an
22 allegation of sexual abuse had been
23 made against a priest in Cornwall and
24 against a probation officer, Ken
25 Seguin."

1 And then he -- page 2, he mentioned the
2 efforts, I guess, that were made by Mr. Greenwell to
3 interview, well, to speak to the chief of -- former Chief
4 of the Cornwall Police, the Mayor, the Children's Aid
5 Society and then at page 3 he mentioned that -- he being
6 Mr. MacKay -- I'm saying mister but it could be a Ms
7 MacKay, but Vice President, so well, we don't know -- it's
8 Mr. or Ms. MacKay.

9 And at the top of page 3:

10 "CJOH was also at that time in
11 possession of a copy of the complaint
12 filed by the individual and that
13 complaint made clear allegations of
14 sexual abuse against Mr. Ken Seguin.
15 Mr. Greenwell spoke at length with the
16 complainant and it was clear that the
17 complainant had not retracted the
18 allegations against Mr. Seguin."

19 So I'm just pausing here. You say that
20 Mr. Greenwell told you that Mr. Silmser had recanted and
21 what the CJOH is replying to you here is that their
22 position is that Mr. Greenwell did -- well, spoke to some
23 people -- spoke to the complainant, and that the
24 complainant made it clear that he was not retracting, or he
25 had not retracted, the allegations against your brother.

1 So could it be that there was a
2 misunderstanding between you and Mr. Greenwell as to what
3 he told you with respect to the recantation issue?

4 **MR. SEGUIN:** Not with my understanding of
5 what he said. It's what -- you got -- probably understand
6 Mr. Greenwell's -- how he's going about getting his story.

7 Now, it looks here that he didn't actually
8 talk to Silmsler until after he was talking to me and even
9 probably after putting that on the news. So he was getting
10 information from Shaver and whoever he was talking to, but
11 before talking to Silmsler.

12 Now, if he talked to him later, and I'm
13 quite sure that that's exactly what Silmsler would tell him,
14 that oh no, I didn't retract it, but if it's in the files
15 that he did, the police files, well then that's what
16 happened. But that's obviously what happened here. He
17 hadn't talked to him until after and so this was months
18 later when they made this up.

19 **MR. RUEL:** Yes, but they are saying here and
20 I mean, this is not your letter, I mean I'm just trying to
21 see what you understand from it because they seem to say
22 that this -- my reading of this is that those verifications
23 were made before the broadcast by Mr. Greenwell because
24 he's talking about verifications that were made on January
25 4 and 5 and then at page 3, CJOH was also at that time in

1 possession of a copy of the complaint and spoke at length
2 with the complainant.

3 So, anyways, that seems to suggest that
4 those conversations happened before the broadcast.

5 **MR. SEGUIN:** Yeah, well, if that's what you
6 understand then you'd have to explain why Greenwell told me
7 what he did and then what he's saying here. That's ---

8 **MR. RUEL:** No, that's -- I'm just verifying
9 if ---

10 **MR. SEGUIN:** Yeah.

11 **MR. RUEL:** So you understood that
12 Mr. Silmsler had recanted his allegation. That's what ---

13 **MR. SEGUIN:** Yes. That's what he told us
14 and maybe that was his way of -- Greenwell's way of going
15 about getting a reaction or whatever, I don't know, because
16 that's what he asked after. Well, you know, would your
17 brother still be alive?

18 **MR. RUEL:** Okay. Now if you can go to
19 Document Number 124198.

20 (SHORT PAUSE / PAUSE COURTE)

21 **MR. RUEL:** Which is a letter from Keith
22 Clingen, Vice President and General Manager of CJSS.

23 **THE COMMISSIONER:** Exhibit 1034 is the
24 letter dated April 28th, 1994 addressed to Mr. Allan J.
25 Darling from Keith Clingen. Yes, Tri-Co Broadcasting.

1 to write:

2 "I informed Mr. Seguin that after we
3 completed our investigation we
4 concluded that the station did
5 broadcast incorrect information
6 concerning the location of his
7 brother's death. The reporter
8 responsible for this error was
9 suspended for one week without pay. I
10 believe the station has demonstrated
11 concern about the situation and that we
12 have cooperated in every way possible,
13 including offering a retraction in our
14 letter to the Commission, February 17th,
15 1994."

16 So I guess you were -- well, they
17 acknowledged the merits of your complaint ---

18 **MR. SEGUIN:** Yes, yes.

19 **MR. RUEL:** --- with respect to CJSS. How
20 did you react to that?

21 **MR. SEGUIN:** Well, no, that was commendable
22 of them and that sort of ended the affair there.

23 **THE COMMISSIONER:** Was there a retraction
24 that was published, sir.

25 **MR. SEGUIN:** I don't know that there ever --

1 like that's on the radio ---

2 **THE COMMISSIONER:** Right.

3 **MR. SEGUIN:** I don't listen to it that much
4 so I'd have to -- I don't remember that there was.

5 **THE COMMISSIONER:** But nonetheless you were
6 satisfied ---

7 **MR. SEGUIN:** Yes.

8 **THE COMMISSIONER:** --- that they had
9 admitted they did wrong and suspended the guy in ---

10 **MR. RUEL:** So the last document I want to
11 show you on this issue is document 124201.

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

13 **THE COMMISSIONER:** Thank you.

14 Exhibit Number 1035 is a letter from the
15 Canadian Radio, Television and Telecommunications
16 Commission to Mr. Seguin et al, dated August 8th, 1994.

17 --- **EXHIBIT NO./PIÈCE NO. P-1035:**

18 (124201) Letter from Allan J. Darling
19 to Douglas Seguin dated August 8th, 1994

20 **MR. RUEL:** So, Mr. Seguin, this is a letter
21 from Mr. Darling, Secretary General of the CRTC, to you.

22 Do you remember receiving that
23 correspondence?

24 **MR. SEGUIN:** Yes.

25 **MR. RUEL:** So I won't read it all, but this,

1 as Mr. Darling states in the first paragraph, this is the,
2 I guess, final decision of the CRTC with respect to your
3 complaints with respect to the news broadcasts of CJOH and
4 CJSS; correct?

5 **MR. SEGUIN:** Yes, yes, sorry.

6 **MR. RUEL:** And they addressed the complaints
7 we've reviewed in your initial letters, but in further
8 correspondence along the way you have with them, you raise
9 some other issues and they address those in this ---

10 **MR. SEGUIN:** Yes, I guess. M'hm.

11 **MR. RUEL:** --- letter here.

12 So I guess it would be fair to say, and
13 correct me if I'm wrong, that the CRTC agreed with you in
14 part ---

15 **MR. SEGUIN:** Yeah, in part, right.

16 **MR. RUEL:** --- with respect to your
17 complaint with respect to CJSS, for example, the issue of
18 the location of your brother's death? That's at page 2:

19 "The Commission found that CJSS did
20 broadcast false and misleading news,
21 contrary to paragraph 3 of the Radio
22 Regulation 1986 when it broadcast that
23 a local police officer died in jail.
24 The licensee admitted this breach in
25 its April 28th, 1994 letter."

1 So this is the letter we reviewed earlier;
2 correct?

3 **MR. SEGUIN:** That's right. M'hm.

4 **MR. RUEL:** The second allegation, and you
5 had mentioned that in your earlier complaint, the second
6 allegation being -- that's at page 2:

7 "The broadcast contained other false
8 and misleading and abusive statements
9 reporting that the probation officer
10 had taken part in sexual acts with
11 young boys while boating on the St.
12 Lawrence River."

13 So on that point the CRTC concluded at the
14 bottom of the page, page 2:

15 "The conclusion of the Commission is,
16 therefore, that despite the opportunity
17 provided to it, the licensee has not or
18 could not establish that its broadcast
19 was not false or misleading with
20 respect to Mr. Seguin's second
21 allegation."

22 So in other words, what they found is that
23 they could not substantiate ---

24 **MR. SEGUIN:** Yeah.

25 **MR. RUEL:** --- the -- whether or not this

1 statement was accurate?

2 MR. SEGUIN: Right. Sort of -- that's sort
3 of a backwards look at -- sort of saying that ---

4 MR. RUEL: Yes.

5 MR. SEGUIN: --- it ---

6 MR. RUEL: I mean, they did not provide any
7 information ---

8 MR. SEGUIN: Yes, it did explain, yeah.

9 MR. RUEL: So with respect to CJOH,
10 essentially -- I'm just going -- that's at page 4. The
11 main allegation you had against the CRTC -- and correct me
12 if I'm wrong -- is at page 4. There's five points here.

13 "The complainant..."

14 That's you.

15 "...stated that Mr. Seguin was not
16 subject of a police investigation and
17 that the allegations against him had
18 been recanted and he was never
19 charged."

20 What the Commission found, and that's at the
21 top of page 5, and I'm reading in the middle of the
22 paragraph:

23 "Because this is not information with
24 which a police department is legally
25 entitled to release, and the fact that

1 the Commission would not require CJOH
2 T.V. to divulge its sources for
3 believing that the police investigation
4 had been undertaken, the Commission is
5 unable to determine the veracity of the
6 news broadcast in that respect."

7 And they could not make a determination as
8 to whether the broadcast was false or misleading on that
9 point; correct?

10 **MR. SEGUIN:** Yeah, which is another reverse
11 -- you know, they're the ones that are supposed to be
12 verifying and all the rest of it, and that very point, you
13 would assume that that means, you know, they broadcast
14 something that they were misleading because they had no
15 knowledge or could not back it up.

16 **MR. RUEL:** But in any event, you were
17 successful in part ---

18 **MR. SEGUIN:** Yes.

19 **MR. RUEL:** --- with respect to your
20 complaints with the media and you've made some other
21 complaints. I won't go ---

22 **MR. SEGUIN:** Right.

23 **MR. RUEL:** I think, Mr. Commissioner, if
24 you'll allow me ---

25 **MR. SEGUIN:** Well, yeah, there's ---

1 **MR. RUEL:** Just a second, Mr. Seguin.

2 **MR. SEGUIN:** Okay.

3 **MR. RUEL:** You've made some other complaint
4 with respect to the media and they've been dealt with. So
5 this is not the only exercise you've been involved in ---

6 **MR. SEGUIN:** No, no.

7 **MR. RUEL:** --- with respect to correcting
8 media statements?

9 **MR. SEGUIN:** That's correct. Yeah, that's
10 correct.

11 **MR. RUEL:** So in this one you had success.
12 In some other ones -- did you -- were you successful with
13 respect to other complaints you've made with the media?

14 **MR. SEGUIN:** No, there was a -- in 2004
15 there was a -- Mr. Guzzo was on there and he really made
16 some wild statements and accusations. So I made another
17 complaint dealing with him, but the CRTC didn't -- I
18 suppose by that time they were -- maybe they were sick of
19 listening to me or something, so they essentially just said
20 that, "We weren't going to pass it on to the people who
21 would make a decision", and just by the way they wrote the
22 -- it looked like CJOH wrote the reply. And they just said
23 they were going to bury it and that was it.

24 **MR. RUEL:** So you also filed a complaint
25 against Perry Dunlop. Is that accurate?

1 **MR. SEGUIN:** Yes, that's right.

2 **THE COMMISSIONER:** Is this under the police

3 ---

4 **MR. RUEL:** Yes.

5 **THE COMMISSIONER:** Well, it's 4:35 -- 4:38.

6 We can do that tomorrow.

7 **MR. RUEL:** Sure.

8 **THE COMMISSIONER:** All right?

9 **MR. RUEL:** Thank you.

10 **THE COMMISSIONER:** We're back at 9:30.

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

12 veuillez vous lever.

13 --- Upon adjourning at 4:39 p.m./

14 L'audience est ajournée à 16h39

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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