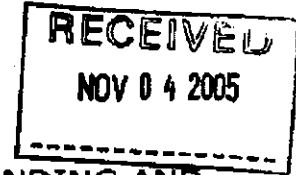


Pursuant to an order by the Commissioner dated January 28, 2009 granting a publication ban, this affidavit has been edited.

**IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO**

AND

**IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE**



AFFIDAVIT OF [REDACTED] C-130

I, [REDACTED] in the Village of Cardinal , in the United County of Grenville , in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims who was sexually abused (hereinafter referred to as "Victims Group") in the Cornwall area.
2. In 1973, I was sexually abused by Ken Seguin, a parole officer with the Department of Corrections. This abuse continued for four years.
3. The Victims Group seeks standing at this Inquiry to ensure that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the following:

- a. When other victims reported their abuse to the authorities, I saw how they were treated and this led to my distrust in the system.
- b. Had I felt protected enough to seek the support of others in trying to cope with the effects of the abuse, my life would have been different. I would not have spent my adult life crippled with feelings of anxiety and depression.

Impact of the Abuse

5. As a result of this sexual abuse, I lost my childhood. I struggled to come to terms with what had happened and I turned to alcohol to help me cope.
6. The abuse has left me in emotional, physical and mental turmoil, which has resulted in an inability to develop meaningful, intimate relationships.
7. My life is filled with feelings of isolation and despair.
8. Since the abuse and the failure of any form of institutional response, I have lost trust in authority figures and institutions. This has resulted in difficulties with the law.

Failings of the Institutional Response

9. Mr. Seguin was in a position of authority and control over my future, as he had an ability to affect my parole. He threatened me and, as such, I felt it was necessary to submit to his sexual advances. I feel that I was victimized by the institution rather than rehabilitated.

10. Because of my status as a parolee, the police did not give merit to the complaint I filed, and therefore failed to respond appropriately.

11. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

12. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

13. I am currently not receiving any psychological help in dealing with the abuse that I endured at the hands of Ken Seguin.

14. As a result of the abuse at the hand of a person in a position responsible for my counselling and rehabilitation, I have no trust or faith in the current services available for such treatment.

Standing

15. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

16. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

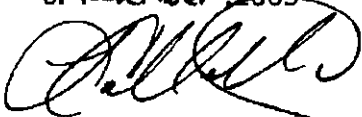
17. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

18. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

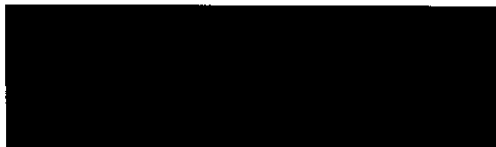
Funding

19. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I am currently employed as a truck driver. My income fluctuates and averages approximately \$2000.00 net monthly. This is my only source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the City)
of Cornwall, in the United)
County of Stormont, Dundas &)
Glengarry, this 4 day)
of November 2005)



LISA DIANE COLLETTE, a Commissioner, etc.,
United Counties of Stormont, Dundas & Glengarry,
for the Corporation of the City of Cornwall,
Expires June 9, 2007.



A Commissioner, etc.)
)

IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF GERALD RENSHAW

I, GERALD RENSHAW, of the Village of Cardinal, in the County of
Leeds and Grenville, in the Province of Ontario, MAKE OATH AND SAY AS
FOLLOWS:

1. I am one of the group of victims who was sexually abused
(hereinafter referred to as "Victims Group") in the Cornwall area.
2. In 1981, at the age of sixteen, I was sexually abused by Ken
Seguin, a parole officer with the Department of Corrections. This abuse
continued for approximately twelve years.
3. The Victims Group seeks standing at this Inquiry to ensure
that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the
following:

- a. The perpetration of sexual abuse by a person entrusted with my counselling and rehabilitation led to my complete distrust in the system.
- b. If I had received help in dealing with the consequences of my abuse earlier on, then my life would have been different. My ongoing troubles with trusting and forming relationships with others may have been minimized.

Impact of the Abuse

5. As a result of this sexual abuse, I lost my childhood. I struggled to come to terms with what had happened and I turned to drugs and alcohol to help me cope.

6. My poor coping mechanisms resulted in my inability to concentrate and led to poor performance in school. As a result of failing all subjects in school, I was asked to leave. This has resulted in my inability to maintain gainful employment.

7. Since the abuse I have struggled with low self-esteem and frequent nightmares.

8. I have difficulties with social relationships and my relationship with my family has been seriously affected by the abuse. In

particular, I experienced a breakdown in the relationship with my son's mother.

9. As a result of the abuse, I suffer from a lack of drive, motivation and interest in life.

Failings of the Institutional Response

10. I was a troubled child when Ken Seguin was appointed my probation officer. By abusing me, he made my life worse instead of better.

11. Because of my status as a parolee, I did not report the abuse because I was fearful of not being believed.

12. I verily believe that the other victims of sexual abuse were poorly treated by the Courts when their cases came to trial and, as such, this has greatly discouraged me. I believe that these victims were called liars by those in authority. I have lost complete faith in the judicial system.

13. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the

Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

14. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

13. I am currently not receiving any psychological help in dealing with the abuse that I endured at the hands of Ken Seguin.

14. I verily believe that I need counselling. I am unable to receive that counselling I so desperately require because I do not have OHIP coverage and I do not have the personal means to fund this treatment.

Standing

15. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of

this Inquiry are met.

16. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

17. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

18. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

Funding

19. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. As such, I am currently receiving employment insurance benefits in the monthly amount of \$800.00. This is my only source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I

require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the City)
of Cornwall, in the United)
County of Stormont, Dundas &)
Glengarry, this 18th day)
of October, 2005)


A Commissioner, etc.)


GERALD RENSHAW

RECEIVED

NOV 04 2005

IN THE MATTER OF THE PUBLIC INQUIRY INTO THE ~~EVENTS~~
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF ROBERT RENSHAW

Please see Supplementary Affidavits for corrections to this Affidavit.

I, ROBERT RENSHAW, of the Village of Seeleys Bay, in the Township of Leeds and Thousand Islands, in the County of Leeds and Grenville, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims (hereinafter referred to as "Victims Group") who was sexually abused in the Cornwall area.
2. In 1978 until 1990 from the age of fifteen to the age of twenty seven I was sexually abused by my probation officer Ken Sequin. In 1983, at the age of twenty, I was sexually abused by Father Charles MacDonald.
3. The Victims Group seeks standing at this Inquiry to ensure that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the

following:

- a. At no time did the Church offer me any support or counselling to deal with the consequences of the abuse.
- b. When the Church knew or ought to have known about Father MacDonald's sexual misconduct, they should have stopped him from hurting other children.
- c. The judicial system failed me and the other victims of Father MacDonald in that the criminal case against him was dismissed due to *Charter* violations. I find it decidedly unjust that the rights of a pedophile were protected when mine, as a victim, were violated.
- d. My probation officer, Ken Sequin died after the commencement of a police investigation. As a result I have little to say with regard to the institutional response on this matter.

Impact of the Abuse

5. I was raised in a family of devout Catholics. However, as a result of this sexual abuse, I have had a total loss of my Catholic faith.
6. I have lost the innocence of my childhood.

7. This sexual abuse has left me with poor self-esteem. I am constantly overwhelmed with feelings of depression. I have in the past attempted suicide.

8. Since the abuse and the failure of any form of institutional response, I have lost trust in authority figures and institutions. This has resulted in difficulties with the law.

9. As a result of the abuse, I live in emotional, physical and mental turmoil. I have difficulties engaging in social activities and this has resulted in an inability to develop meaningful, intimate relationships.

10. Due to my inability to cope with the abuse, I developed a propensity to engage in reckless behaviour.

Failings of the Institutional Response

11. The criminal charges against Father MacDonald were dismissed due to *Charter* violations.

12. I am poorly educated and a low income wage earner as a result of the abuse and, as such, the police have treated me poorly. They have questioned my credibility and have failed me as a victim.

13. Despite knowledge of the abuse, the Diocese of Alexandria-Cornwall has never offered to provide or fund counselling or support in my efforts to rehabilitate from the effects of the abuse.

14. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

15. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims

Clinical Support

16. I am currently receiving psychological help in dealing with the abuse that I endured at the hands of Father Charles MacDonald.

17. I am not satisfied with the level of support that I am currently receiving. This counselling is an out-of-pocket expense which I cannot afford to fund on my own.

18. I verily believe that victims of sexual abuse who struggle to deal with issues of trust should be able to seek individual counselling with qualified counsellors of their choosing.

19. I verily believe that I will continue to require psychological support and counselling to help me deal with the emotional trauma I have suffered as a result of the abuse.

Standing

20. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

21. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.


22. Having personally experienced the depths of the impact of

sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

23. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

Funding

24. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I am currently working in automotive body repair industry as a labourer. I receive \$1800.00 monthly gross income. This is my only source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the)
Village of Seeleys Bay,)
in the Township of Leeds and)
Thousand Islands, in the)
County of Leeds and Grenville)
this 3 day of)
November, 2015.)
)
A Commissioner, etc.)


ROBERT RENSHAW

Pursuant to an order by the Commissioner dated January 28, 2009 granting a publication ban, this affidavit has been edited.

**IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO**

AND

**IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE**

AFFIDAVIT OF [REDACTED] C-131

Please see Supplementary Affidavits for corrections to this Affidavit.

I, [REDACTED] of the Town of Clinton, in the County of Huron, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims who was sexually abused (hereinafter referred to as "Victims Group") in the Cornwall area.
2. In 1969, I was sexually abused by Raymond Rivette and [REDACTED]. This abuse continued for seventeen years.
3. The Victims Group seeks standing at this Inquiry to ensure that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the following:
 - a. The system failed, in that, the Crown Attorney, Malcolm MacDonald, who was appointed to convict the perpetrators of

Upon order of the Commissioner dated May 29, 2006, a portion of this Affidavit has been removed from the website at the request of the Episcopal Corporation of Alexandria-Cornwall who sought removal, and the consent of The Citizens for Community Renewal, The Victims Group, The Men's Project and Father Charles MacDonald; those parties having expressed an interest in this matter, on the ground that it contained an unproven allegation which implicated an individual's right to be presumed innocent. This material is available at the Commission's office upon specific request.

abuse in my case, was also a known pedophile. Because of his involvement as Crown Attorney, the perpetrators received reduced charges and minimal sentences.

- b. If I had received help in dealing with the consequences of my abuse earlier on, then my life would have been different. I would not struggle with ongoing psychiatric problems.

Impact of the Abuse

- 5. As a result of this sexual abuse, I lost my childhood.
- 6. I have struggled to come to terms with what happened and I have turned to drugs and alcohol to help me cope.
- 7. Since the abuse and the failure of any form of institutional response, I have lost trust in authority figures and institutions.
- 8. I have developed problems in maintaining normal intimate relationships with others.
- 9. As a result of the abuse, I spent most of my formative years in physical, mental and emotional turmoil.

10. I suffer from severe psychiatric problems as a result of the abuse, namely, mood disorders, depression and anxiety.

Failings of the Institutional Response

11. I verily believe that the police have failed the victims of sexual abuse. Specifically, they did not investigate many claims brought forward. As a result, I have lost complete faith in the judicial system.

12. I verily believe that the Crown Attorney who prosecuted my case protected the perpetrators and failed to consider how the abuse damaged me as a victim.

13. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

14. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

15. I am currently receiving limited psychological help in dealing with the abuse that I suffered.

16. Currently, I am not satisfied with the level of support that I am receiving. I feel that it is a constant struggle to receive the care and help that I require.

17. I verily believe that I will continue to require extensive, long-term psychological support and counselling to help me deal with the very severe emotional trauma I have suffered as a result of the abuse. I gather this understanding from information and feedback gained during the counselling and therapy which I do receive.

Standing

18. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

19. I further understand that I have the potential for a civil

action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

20. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

21. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

Funding

22. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I have been clinically diagnosed with Multiple Personality Disorder. As such, I am currently receiving benefits from Ontario Disability Support Program and Canada Pension Plan in the monthly amount of \$1,400.00. This is my only source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which

I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the)
City of London, in the County)
of Middlesex, this 14th day)
of October, 2005)

PK100)

A Commissioner, etc.)



IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF ALAIN SEGUIN

I, ALAIN SEGUIN, of the Township of South Stormont, in the
United County of Stormont, Dundas & Glengarry, in the Province of Ontario,
MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims who was sexually abused
(hereinafter referred to as "Victims Group") in the Cornwall area.
2. In 1972, at the age of twelve, I was sexually abused by
Robert Sabourin, a teacher in Cornwall at the time. This abuse continued
for two years.
3. The Victims Group seeks standing at this Inquiry to ensure
that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the
following:

- a. Early complaints from other victims were not acted upon. I saw how they were treated and this led to my distrust in the system. I believe the Church, school and police tried to protect the abuser and not the victims of sexual abuse.
- b. In 1998, a criminal charge was laid against Sabourin with respect to my abuse. He plead guilty. Even since his admission of guilt, I have been offered no assistance from the Church or school in dealing with the sexual abuse.

Impact of the Abuse

5. As a result of this sexual abuse, I lost my childhood. I struggled to come to terms with what had happened and I turned to drugs and alcohol to help me cope.

6. My poor coping mechanisms resulted in my inability to concentrate and led to poor performance at school. Eventually I dropped out.

7. Since the abuse and the failure of any form of institutional response, I have lost trust in authority figures and institutions. As a result, I experienced difficulties with the law.

8. As a result of the abuse, I spent most of my formative years

in physical, mental and emotional turmoil. I have trouble trusting others which has resulted in difficulties maintaining relationships with others.

9. The actions of Sabourin have left me with permanent psychological and physical injuries. My ability to carry on a normal life has been extinguished.

10. As a result of my inability to cope with the abuse, I have had difficulties maintaining gainful employment.

Failings of the Institutional Response

11. I verily believe that the other victims of sexual abuse were poorly treated by the Courts when their cases came to trial, and as such, this has greatly discouraged me. I have lost complete faith in the judicial system.

12. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

13. My detailed experiences dealing with the police and justice

institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

14. I am currently receiving limited psychological help in dealing with the abuse that I suffered at the hands of Robert Sabourin.

15. I am not satisfied with the level of support that I am receiving. I do not feel the professionals that I have dealt with thus far have adequate resources to help me.

16. I verily believe that I will continue to require psychological support and counselling to help me deal with the emotional trauma I have suffered, as a result of the abuse.

Standing

17. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

18. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

19. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

20. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

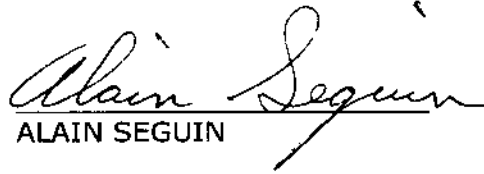
Funding

21. I have been clinically diagnosed with Post Traumatic Stress Disorder. With great difficulty I have been able to secure and maintain employment. However, I am the single father of two children who has single-handedly raised my children for the past fifteen years. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be

unable to participate in the Inquiry.

SWORN BEFORE ME at the City)
of Cornwall, in the United)
County of Stormont, Dundas &)
Glengarry, this 19th day)
of October, 2005)


A Commissioner, etc.)


ALAIN SEGUIN

RECEIVED
NOV 04 2005

IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF LARRY SEGUIN

I, LARRY SEGUIN, of the City of Cornwall, in the United County
of Stormont, Dundas & Glengarry, in the Province of Ontario, MAKE OATH
AND SAY AS FOLLOWS:

1. I am one of the group of victims who was sexually abused
(hereinafter referred to as "Victims Group") in the Cornwall area.

2. In 1977 and 1987, at the age of six and sixteen, I was
sexually abused by Edward DeJardines as well as an unknown perpetrator.
These abuses were each one-time occurrences.

3. The Victims Group seeks standing at this Inquiry to ensure
that the perspective of the Victims Group is brought before the Inquiry.

4. As a victim of sexual abuse, my perspective includes the
following:

example, I am very uncomfortable changing my children's diapers.

Failings of the Institutional Response

10. I verily believe that the city leaders of Cornwall have failed in their duty to the citizens and helpless victims of sexual crimes.

11. When I was seven years old, I reported to the police the abuse that had occurred. I was told by the police officer that the word of a seven-year-old, one year after the abuse occurred would not be taken seriously so he would not be laying a charge. I feel that this complete disregard of my complaint further endangered me and other potential victims.

12. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

13. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

14. I have sought out psychological help in dealing with the abuse that I suffered at the hands of Edward DeJardines.

15. Although I have received very limited help, I am not satisfied with the level of care I am receiving. I have been placed on a waiting list because the program is under-funded.

16. I verily believe that I will continue to require psychological support and counselling to help me deal with the emotional trauma I have suffered as a result of the abuse.

Standing

17. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

18. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those

legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

19. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

20. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

Funding

21. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I have been clinically diagnosed with Post Traumatic Stress Disorder. I am not currently receiving social assistance nor do I have any other source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the City)
of Kingston, in the County of)
Frontenac this 21st day)
of *OCTOBER*, 2005.)

Larry Seguin
LARRY SEGUIN

Mr. Cuthy.
A Commissioner, etc.)

*Know Me to be the person, a
Commissioner, Frontenac
County, Ontario, Canada,
who has signed the
above instrument, and that
he is the person named in
the instrument, and that he
is the person named in the
instrument, and that he is
the person named in the
instrument, and that he is
the person named in the
instrument.*
24 June 2006.

IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF ROBERT SHEETS

I, ROBERT SHEETS, of the City of London, in the County of
Middlesex, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims (hereinafter referred to as "Victims Group") who was sexually abused in the Cornwall area.
2. In 1977, I was sexually abused by Richard Hickerson, Nelson Baroque and Ken Seguin. This abuse continued for five years.
3. The Victims Group seeks standing at this Inquiry to ensure that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the following:
 - a. The perpetration of sexual abuse by persons entrusted with

my counselling and rehabilitation led to my complete distrust in the system.

- b. If I had received help in dealing with the consequences of my abuse earlier on, then my life would have been different. I would not struggle with ongoing psychiatric problems.

Impact of the Abuse

5. As a result of this sexual abuse, I lost my childhood. I struggled to come to terms with what had happened and I turned to drugs and alcohol to help me cope and am addicted to both to this day.

6. My poor coping mechanisms resulted in my inability to concentrate and I dropped out of school in the ninth grade. As a result, I find it difficult to obtain gainful employment.

7. Since the abuse and the failure of any form of institutional response, I have lost trust in authority figures and institutions. This has led me to experience difficulties with the law.

8. The abuse has left me in emotional, physical and mental turmoil, which has resulted in an inability to develop meaningful, intimate relationships.

Failings of the Institutional Response

9. The Province failed in its job to rehabilitate me as a parolee.

10. Due to my status as a parolee, the authorities questioned my credibility and have failed me as a victim.

11. Despite knowledge of the abuse coming to light, at no time have I ever been offered any adequate psychological counselling or support to help me deal with the consequences of the abuse that I suffered at the hands of Nelson Baroque, Ken Seguin and Richard Hickerson.

12. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

13. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

14. Currently, I am not receiving psychological help in dealing with the abuse that I endured.

15. I verily believe that I require psychological support and counselling to help me deal with the emotional trauma I have suffered as a result of the abuse. However, I believe that I should be able to see the counsellor of my choosing and that I should be able to get this help in London, which is the town where I currently reside. This does not appear to be an option at this time.

Standing

16. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

17. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other

victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

18. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

19. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.


20. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I have been clinically diagnosed with paranoia and severe depression. As such, I am currently receiving benefits from Ontario Disability Support Program in the monthly amount of \$930.00. This is my only source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the City)
of London , in the County)
Middlesex this 24th day)
of ~~October~~ , 2005.)

October 26.)



A Commissioner, etc.)



ROBERT SHEETS

Pursuant to an order by the Commissioner dated January 28, 2009 granting a publication ban, this affidavit has been edited.

**IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO**

AND

**IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE**

AFFIDAVIT OF [REDACTED] C-132

Please see Supplementary Affidavits for corrections to this Affidavit.

I, [REDACTED] of the City of Cornwall, in the United County of Stormont, Dundas & Glengarry, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims who was sexually abused (hereinafter referred to as "Victims Group") in the Cornwall area.
2. At the age of twelve, I was sexually abused by [REDACTED]. This abuse continued for 1½ years.
3. The Victims Group seeks standing at this Inquiry to ensure that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the following:
 - a. When the Church knew or ought to have known about the

Upon order of the Commissioner dated May 29, 2006, a portion of this Affidavit has been removed from the website at the request of the Episcopal Corporation of Alexandria-Cornwall who sought removal, and the consent of The Citizens for Community Renewal, The Victims Group, The Men's Project and Father Charles MacDonald; those parties having expressed an interest in this matter, on the ground that it contained an unproven allegation which implicated an individual's right to be presumed innocent. This material is available at the Commission's office upon specific request.

sexual abuse perpetrated by one of their priests, they did not provide counselling and support to the victims that they were aware of, nor did they make any attempts to seek out other victims.

- b. If I had received help in dealing with the consequences of my abuse earlier on, my life would have been different. I would not have spent my adult life crippled with feelings of depression and anxiety.

Impact of the Abuse

5. As a result of this sexual abuse, I have turned to alcohol and drugs to help me cope.

6. Since the abuse and the failure of any form of institutional response, I have lost trust in authority figures and institutions. I have developed problems in maintaining normal intimate relationships with others.

7. As a result of the abuse, I spent most of my formative years in physical, mental and emotional turmoil which resulted in difficulties with the law.

8. The abuse has rendered me unable to cope. I have

difficulties controlling my anger which often results in aggressive and violent behaviour towards others.

9. Because of the abuse I have suffered, I must take medication in order to control my feelings of worthlessness and depression.

Failings of the Institutional Response

10. I verily believe that the other victims of sexual abuse were poorly treated by the Courts when their cases came to trial and, as such, this has greatly discouraged me. I have lost complete faith in the judicial system.

11. At no time have I ever been offered any psychological counselling or support by the Diocese of Alexandria-Cornwall to help me deal with the consequences of the abuse that I suffered at the hands of

[REDACTED]

12. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

13. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

14. Currently, I am not receiving any psychological help in dealing with the abuse that I suffered at the hands of Father Lussier.

15. I verily believe that I require psychological support and counselling, but I am uncomfortable with the resources that are currently available to help me deal with the emotional trauma I have suffered as a result of the abuse.

Standing

16. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

17. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

18. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

19. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

Funding

20. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I have been clinically diagnosed with severe depression. As such, I am currently receiving social assistance in the monthly amount of \$314.00. This is my only source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which

I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the City)
of Cornwall, in the United)
County of Stormont, Dundas &)
Glengarry, this 18th day)
of October, 2005)


A Commissioner, etc.)



IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF ADRIEN ST. LOUIS

Please see Supplementary Affidavits for corrections to this Affidavit.

I, ADRIEN ST. LOUIS, of the Village of Apple Hill, in the Township of North Glengarry, in the United County of Stormont, Dundas & Glengarry, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims (hereinafter referred to as "Victims Group") who was sexually abused in the Cornwall area.
2. In 1974, at the age of seventeen, I was sexually abused by Father Donald Scott and Bishop Eugene LaRocque. This abuse continued for three years.
3. The Victims Group seeks standing at this Inquiry to ensure that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the following:

- a. When the Church should have known about the abuses committed by their priests they had a duty to stop the continual abuse of other young victims.
- b. The Church did not offer me any counselling or support. Had intervention been offered, my life would have been very different. I would not have spent my entire life in crippling emotional turmoil.

Impact of the Abuse

5. I lost my childhood as a result of the abuse.
6. I could not concentrate and subsequently dropped out of school.
7. I developed behavioural problems as I struggled to cope with depression and low self-esteem.
8. To help me cope, I have turned to alcohol.
9. Due to my emotional trauma and lack of education, I have had great difficulty maintaining gainful employment.

10. Since the abuse and the failure of any form of institutional response, I have lost trust in authority figures and institutions. I have not been able to form intimate relationships.

Failings of the Institutional Response

11. When the Diocese became aware of the sexual abuse committed by their priests, they failed to taken any action.

12. At no time have I ever been offered any psychological counselling or support by the Diocese of Alexandria-Cornwall to help me deal with the consequences of the abuse that I suffered at the hands of Father Donald Scott and Bishop Eugene LaRocque.

13. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

14. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a

summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

15. Currently, I am receiving limited psychological help in dealing with the abuse.

16. I am not satisfied with the level of support that I am receiving as my options for counselling are very limited.

17. I verily believe that victims of sexual abuse who struggle to deal with issues of trust should be able to seek individual counselling with qualified counsellors of their choosing.

18. I verily believe that I will continue to require psychological support and counselling to help me deal with the emotional trauma I have suffered as a result of the abuse.

Standing

19. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the

Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

20. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

21. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

22. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

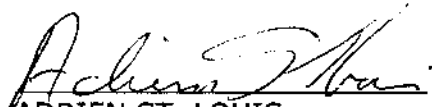
Funding

23. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I have been clinically diagnosed with a Multiple Disability which stems from a neurological disability that I believe has been caused by the sexual abuse. I am

currently employed, but even while receiving disability benefits and Canada Pension Plan I earn a total monthly income of \$1,700. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the City)
of Cornwall, in the United)
County of Stormont, Dundas)
& Glengarry, this 13th day)
of October, 2005)


A Commissioner, etc.)


ADRIEN ST. LOUIS

Pursuant to an order by the Commissioner dated January 28, 2009 granting a publication ban, this affidavit has been edited.

**IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO**

AND

**IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE**

AFFIDAVIT OF [REDACTED] C-133

I, [REDACTED] of the City of Cornwall, in the United County of Stormont, Dundas & Glengarry, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims who was sexually abused (hereinafter referred to as "Victims Group") in the Cornwall area.
2. In or about 1984, I was sexually abused by Ken Seguin, a parole officer with the Department of Corrections, and by Father Charlie MacDonald. This abuse continued for approximately two weeks.
3. The Victims Group seeks standing at this Inquiry to ensure that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the following:

- a. The perpetration of sexual abuse by a person entrusted with my counselling and rehabilitation led to my complete distrust in the system.
- b. When the Church became aware of the behaviours of Father MacDonald, they may have stopped or controlled him, thereby preventing his further abuse of other victims.

Impact of the Abuse

5. As a result of this sexual abuse, I lost my childhood. I struggled to come to terms with what had happened and I turned to drugs and alcohol to help me cope.

6. Since the abuse and the failure of any form of institutional response, I have lost trust in authority figures and institutions. As a result, I have encountered difficulties with the law.

7. I am unable to cope with the effects of the abuse. Often times I find myself overwhelmed with feelings of depression and anxiety.

8. As a result of my inability to cope with the effects of the abuse, at times I find it difficult to control my feelings of anger. As such, I have developed a propensity toward violent behaviour.

9. Being abused by a Catholic priest has resulted in a complete loss of my religious faith.

Failings of the Institutional Response

10. I believe that details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order to fulfil its mandate.

11. My detailed experience dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

12. At no time have I ever been offered any psychological counselling or support by the Diocese of Alexandria-Cornwall to help me deal with the consequences of the abuse that I suffered at the hands of Father Charlie MacDonald.

13. Currently, I am receiving limited psychological help in dealing with the abuse.

14. Although I am currently receiving very limited help, as a result of being abused at the hands of a person who was position responsible for my counselling and rehabilitation, I am reluctant and wary of trusting professional help. I believe this stands in the way of my healing process.

15. I verily believe that I will continue to require psychological support and counselling to help me deal with the emotional trauma I have suffered as a result of the abuse.

Standing

16. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

17. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those

legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

18. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

19. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

Funding

20. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I have recently been released from prison and am currently collecting social assistance. This is my only source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

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IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF JASON TYO

I, JASON TYO, of the Village of Martintown, in the United County of Stormont, Dundas & Glengarry, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims (hereinafter referred to as "Victims Group") who was sexually abused in the Cornwall area.
2. In 1981, at the age of nine, I was sexually abused by Jean-Luc Leblanc. This abuse continued for approximately seven years.
3. The Victims Group seeks standing at this Inquiry to ensure that the perspective of the Victims Group is brought before the Inquiry
4. As a victim of sexual abuse, my perspectives include the following:
 - a. When Jean-Luc Leblanc was brought to justice, the sentence

imposed on him was too lenient. I feel that the punishment he received pales in comparison to the ruin he effected in my life and the lives of others. The justice system failed me as a victim.

- b. I received no offer of support or counselling to help me deal with the effects of my abuse. Had I received any intervention, my life would not have turned out so bleak.

Impact of the Abuse

5. As a result of the abuse, I lost my childhood. I suffered a debilitating loss of the enjoyment of my life. I turned to drugs and alcohol to help me cope.

6. This sexual abuse has left me with poor self-esteem. I am constantly overwhelmed with feelings of depression.

7. Since the abuse and the failure of any form of institutional response, I have lost trust in authority figures and institutions. This has resulted in difficulties with the law. The charges I have faced include sexual invitation to touching against [REDACTED] I believe this to be a result of my own abuse.

8. The abuse rendered me unable to cope. I could not concentrate in my academic endeavours and therefore dropped out after grade eleven.

Failings of the Institutional Response

9. After I reported the abuse to my teacher in 1983, Jean-Luc Leblanc only received probation of three years. I regard this as a complete failure on the part of the system, in that a known pedophile was allowed to remain a part of society thereby endangering others. In fact, two years into his probation, Leblanc sought me out and the abuse recommenced.

10. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order to fulfil its mandate.

11. My detailed experience dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

12. Currently, I am not receiving psychological help in dealing with the abuse that I endured at the hands of Jean-Luc Leblanc.

13. I verily believe that victims of sexual abuse who struggle to deal with issues of trust should be able to seek individual counselling with qualified counsellors of their choosing.

14. I verily believe that I require psychological support and counselling to help me deal with the emotional trauma I have suffered as a result of the abuse. However, I have been unsuccessful in my endeavours to secure such treatment.

Standing

15. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

16. I further understand that I have the potential for a civil

action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

17. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

18. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

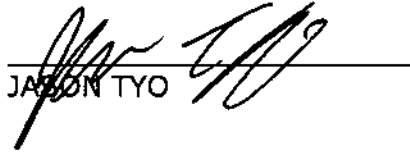
Funding

19. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I am a low-income wage earner, therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the)
City of Cornwall, in the)
United County of Stormont,)
Dundas & Glengarry)
this 4 day of November)
, 2005.)


A Commissioner, etc.)

LISA DIANE COLLETTE, a Commissioner, etc.,
United Counties of Stormont, Dundas & Glengarry,
for the Corporation of the City of Cornwall,
Expires June 9, 2007.



JASON TYO

IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF FERNAND VIVARAIS

Please see Supplementary Affidavits for corrections to this Affidavit.

I, FERNAND VIVARAIS, of the Town of Newington, Township of South Stormont, in the United County of Stormont, Dundas & Glengarry, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims who was sexually abused (hereinafter referred to as "Victims Group") in the Cornwall area.
2. In approximately 1958-59, while in Grade 7, I was sexually abused by Reverend Stone.
3. The Victims Group seeks standing at this Inquiry to ensure that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the following:

- a. If I had help in dealing with the consequences of my abuse earlier on, my life would have been very different. I would have felt less guilt and shame and would have been able to better cope with the effects of the abuse.
- b. The authorities have disbelieved the allegations made by the other victims and this has created distrust in the system.

Impact of the Abuse

5. As a result of the abuse, I could not concentrate in school and was unable to complete my schooling beyond Grade 8.
6. The abuse has left me emotionally traumatized. I have had difficulties getting and keeping gainful employment.
7. The abuse has caused ongoing psychiatric problems that have required hospitalization.
8. My feelings of despair have been so overwhelming that I have often thought about committing suicide.
9. At night I experience nightmares just thinking about the abuse suffered by myself and my brother.

10. I continue to feel dirty and ashamed and have become obsessed with washing myself. It has affected my life.

11. Since the abuse and the failure of any form of institutional response, I have lost all trust in authority figures and institutions.

Failings of the Institutional Response

12. When I see how other victims have been treated, I have great difficulty discussing it with anyone, as I cannot trust the authorities.

13. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

14. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

15. Currently, I am receiving limited psychological help in dealing with the abuse that I endured at the hands of Reverend Stone.

16. I am currently satisfied with the level of support that I am receiving. However, I verily believe that there are other victims who need some type of support and cannot afford it.

17. I verily believe that I will continue to require psychological support and counselling to help me deal with the emotional trauma I have suffered as a result of the abuse.

Standing

18. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

19. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry.

Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

20. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

21. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

Funding

22. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. As such, I am currently receiving Workplace Safety and Insurance Board benefits and Canada Pension Plan in the monthly amount of \$3,000.00. This is my only source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice, receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the City)
of Cornwall, in the United)
County of Stormont, Dundas &)
Glengarry, this 18th day)
of October, 2005)

)
A Commissioner, etc.)


FERNAND VIVARAIS

IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF REJEAN VIVARAIS

Please see Supplementary Affidavits for corrections to this Affidavit.

I, REJEAN VIVARAIS, of the City of Cornwall, in the United
County of Stormont, Dundas & Glengarry, in the Province of Ontario, MAKE
OATH AND SAY AS FOLLOWS:

1. I am one of the group of victims (hereinafter referred to as
"Victims Group") who was sexually abused in the Cornwall area.
2. In 1957, at the approximate age of fourteen, I was sexually
abused by Reverend Meunier. This abuse lasted for six months.
3. The Victims Group seeks standing at this Inquiry to ensure
that the perspective of the Victims Group is brought before the Inquiry.
4. As a victim of sexual abuse, my perspective includes the
following:

- a. When I reported my abuse to another priest, the Catholic Church was or ought to have been made aware of my allegations. They did nothing to stop the harm caused by Father Meunier.
- b. When the Church knew or ought to have known about the abuse, they did not offer me any counselling or support. If they had, my life would have been completely different. I would have felt less ostracized from the Church and my family.

Impact of the Abuse

5. My family members were devout Catholics and as a result of this abuse, I have lost my faith in the Catholic Church hierarchy.
6. The abuse suffered at such a young age has resulted in difficulties with my nerves. I also have trouble sleeping.
7. The abuse has left me emotionally traumatized. I have had difficulties maintaining gainful employment.
8. My ability to cope has been non-existent and I have not received any psychological support. Instead, I turned to alcohol and have abused it.

9. I cannot trust others and this has led to strained relationships with family and friends. Since the abuse and failure of any form of institutional response, I have also lost trust in authority figures and institutions.

Failings of the Institutional Response

10. In confession I told another priest of the abuse suffered at the hands of Father Meunier but the Catholic Church did nothing about it and did not offer me help in any way.

11. I believe that further details of my first hand experience as a victim dealing with the Cornwall police and justice system, which is the focus of Part I of this Inquiry, would be beneficial information for the Inquiry. I believe that my experiences and those of other victims must be canvassed by the Inquiry in order for it to fulfill its mandate.

12. My detailed experiences dealing with the police and justice institutions could be obtained by my testimony or the provision of a summary of my experiences. The provision of either would be most effective if counsel were provided to me as it would be to other victims.

Clinical Support

13. Currently, I am receiving counselling from a peer group to help deal with the abuse that I endured at the hands of Reverend Meunier.

14. However, I am not satisfied with the level of support that I am receiving. I verily believe that many of the other victims of sexual abuse also do not have adequate resources to help them.

15. Due to our issues with trust, I verily believe that, as victims, we should be able to seek the help that we need from various resources.

16. I verily believe that I will continue to require psychological support and counselling to help me deal with the emotional trauma I have suffered as a result of the abuse.

Standing

17. As a first hand victim of sexual abuse, I verily believe that it is crucial that my perspective be brought before the Inquiry. Therefore, I have a direct interest in the outcome of this Inquiry and, as part of the Victims Group, have a substantial interest in ensuring the objectives of this Inquiry are met.

18. I further understand that I have the potential for a civil action or application for criminal injuries compensation and that those legal rights may be impacted by my participation within the Inquiry. Accordingly, I believe that I need access to legal counsel, as do other victims like me, in order to fairly participate without detrimental impact upon my civil and administrative remedies.

19. Having personally experienced the depths of the impact of sexual abuse and the related institutional failings, I, like other victims have the greatest motivation to see the system corrected and improved.

20. I strongly believe that there is no greater advocate for systematic improvement of the treatment, handling, and prosecution of sexual abuse cases than the victims themselves.

Funding

21. One of the devastating effects of my sexual abuse has been my inability to maintain gainful employment. I have been clinically diagnosed with extreme anxiety and sleep disorder. As such, I am currently receiving benefits from Ontario Disability Support Program in the monthly amount of \$817.00. This is my only source of income. Therefore, in order to participate and be adequately represented at the Cornwall Inquiry I require that Ledroit Beckett, as my counsel of choice,

receive funding to represent my interests without which I would otherwise be unable to participate in the Inquiry.

SWORN BEFORE ME at the City)
of Cornwall, in the United)
County of Stormont, Dundas &)
Glengarry, this 13th day)
of October, 2005)


A Commissioner, etc.)


REJEAN VIVARAIS

Exhibit C

NOTICE

VICTIMS OF SEXUAL ABUSE

All victims of sexual abuse and victims groups seeking participation in the upcoming Cornwall Public Inquiry are invited to attend a Victims Representation meeting to be held, on **Tuesday, October 18, 2005 at 6:00 pm in the St. Lawrence Room West at the Ramada Inn located 805 Brookdale Avenue, Cornwall, Ontario.**

The intention of this meeting is to coordinate legal representation for the victims of sexual abuse and victims groups at the upcoming Cornwall Public Inquiry.

Inquiries concerning this can be directed to John Swales until Wednesday, October 19, 2005.

At

613-933-8000

LEDROITBECKETT
LITIGATION LAWYERS

61559441

630 Richmond St. London, Ontario N6A 3G6 tel: 519-673-4994

Exhibit D

October 20, 2005

*Reply Directly to: P. M. Ledroit
Direct Line: 673-6244 ext. 14
E-Mail: pledroit@ledroitbeckett.com*

Mr. Rick Goodwin
c/o The Mens Project
321 Argyle Avenue,
Ottawa, ON
K2P 1B7

Dear Mr. Goodwin:

RE: CORNWALL PUBLIC INQUIRY

As you are aware, the Cornwall Public Inquiry into the events surrounding the allegations of historic abuse of young people in the Cornwall area and the lack of institutional response of the justice system and other public institutions to this historic abuse was formally called on April 18, 2005 by the Government of Ontario with the Honourable Mr. Justice Normand Glaude appointed as Commissioner.

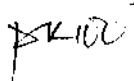
Applications for standing and/or funding in relation to Part I or Part II of the Cornwall Public Inquiry will be heard commencing November 7, 2005. As such, the application deadline for standing and/or funding must be submitted by October 25, 2005.

The funding application for participation at the Cornwall Public Inquiry necessitates that applicants with similar interests should contact other similar groups for amalgamation purposes.

The law firm of Ledroit Beckett intends to apply for standing and funding at the Cornwall Public Inquiry on behalf of approximately fifty (50) victims of sexual abuse. These victims are the very subject matter of which the Inquiry will consider when making recommendations surrounding the future institutional responses for victims of sexual abuse.

As providers of counselling and support to victims of sexual abuse, we wish to acknowledge that you may know of victims who may wish to participate in the Cornwall Public Inquiry. The interests and perspectives of these victims may be similar to the group whom we intend to represent. Therefore, should such victims wish to amalgamate with our group, please let us know at your earliest convenience.

Yours very truly,



for
P. M. Ledroit

PML/pk

Exhibit E

October 20, 2005

*Reply Directly to: P. M. Ledroit
Direct Line: 673-6244 ext. 14
E-Mail: pledroit@ledroitbeckett.com*

Carson Chisholm
c/o Coalition for Action
16755 Maloney Road
R.R. #1
St. Andrew's West, ON
K0C 2A0

Dear Mr. Chisholm:

RE: CORNWALL PUBLIC INQUIRY

As you are aware, the Cornwall Public Inquiry into the events surrounding the allegations of historic abuse of young people in the Cornwall area and the lack of institutional response of the justice system and other public institutions to this historic abuse was formally called on April 18, 2005 by the Government of Ontario with the Honourable Mr. Justice Normand Glaude appointed as Commissioner.

Applications for standing and/or funding in relation to Part I or Part II of the Cornwall Public Inquiry will be heard commencing November 7, 2005. As such, the application deadline for standing and/or funding must be submitted by October 25, 2005.

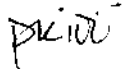
The funding application for participation at the Cornwall Public Inquiry necessitates that applicants with similar interests should contact other similar groups for amalgamation purposes.

The law firm of Ledroit Beckett intends to apply for standing and funding at the Cornwall Public Inquiry on behalf of approximately fifty (50) victims of sexual abuse. These victims are the very subject matter of which the Inquiry will consider when making recommendations surrounding the future institutional responses for victims of sexual abuse.

Therefore, I am writing to confirm your discussion with my associate Pauline Kidd which transpired this morning.

In the past, your organization has referred victims of sexual abuse to our office. In light of our intention to apply for standing and funding while minimizing the costs and the potential for duplicity of the proceedings, we have requested and you have committed to informing us of any new victims whose interests and perspectives are similar to those we plan to represent.

Yours very truly,



for
P. M. Ledroit

PML/PK/jn

Exhibit F

October 20, 2005

*Reply Directly to: P. M. Ledroit
Direct Line: 673-6244 ext. 14
E-Mail: pledroit@ledroitbeckett.com*

Paul Scott
Citizens for Community Renewal
315 Ellen Avenue
Cornwall, ON
K6J 5T7

Dear Mr. Scott:

RE: CORNWALL PUBLIC INQUIRY

As you are aware, the Cornwall Public Inquiry into the events surrounding the allegations of historic abuse of young people in the Cornwall area and the lack of institutional response of the justice system and other public institutions to this historic abuse was formally called on April 18, 2005 by the Government of Ontario with the Honourable Mr. Justice Normand Glaude appointed as Commissioner.

Applications for standing and/or funding in relation to Part I or Part II of the Cornwall Public Inquiry will be heard commencing November 7, 2005. As such, the application deadline for standing and/or funding must be submitted by October 25, 2005.

The funding application for participation at the Cornwall Public Inquiry necessitates that applicants with similar interests should contact other similar groups for amalgamation purposes.

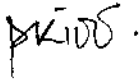
The law firm of Ledroit Beckett intends to apply for standing and funding at the Cornwall Public Inquiry on behalf of approximately fifty (50) victims of sexual abuse. These victims are the very subject matter of which the Inquiry will consider when making recommendations surrounding the future institutional responses for victims of sexual abuse.

Therefore, I am writing to confirm your discussion with my associate Pauline Kidd which transpired this morning.

In attempts to minimize costs and the potential for duplicity of the proceedings, we contacted you requesting information that you may have regarding any new victims whose interests and perspectives are similar to those which we plan to represent.

As a citizens group, you explained that your interests are different from those of the victims and could not envision an amalgamation at this time.

Yours very truly,



for
P. M. Ledroit

PML/PK/jn

Exhibit G

IN THE MATTER OF THE PUBLIC INQUIRY INTO THE EVENTS
SURROUNDING THE ALLEGATIONS OF ABUSE OF YOUNG
PEOPLE IN CORNWALL, ONTARIO

AND

IN THE MATTER OF THE APPLICATION FOR STANDING AND
FUNDING FOR THE VICTIMS OF THE ABUSE

AFFIDAVIT OF PAUL MAURICE LEDROIT

I, PAUL MAURICE LEDROIT, of the City of London, in the County of Middlesex, in the Province of Ontario, MAKE OATH AND SAY AS FOLLOWS:

1. I am a partner in the law firm of Ledroit Beckett Litigation Lawyers ("Ledroit Beckett"), solicitors for a group of 48 Cornwall area victims of sexual abuse, which have designated themselves the *Victims Group* with respect to the Cornwall Inquiry (the "Inquiry"), as such I have personal knowledge of the matters which I herein depose.

2. The Victims Group has retained Ledroit Beckett to seek funding and standing for them at the Inquiry and also thereafter represent them at the Inquiry to the extent of the standing and funding granted by the Commission. No retainer funds have been provided.

LEDROIT BECKETT

3. In my 34 years of practice, I have acted as Plaintiff's Counsel in numerous sexual abuse actions, specifically in the last decade I have had a number of clergy sexual-abuse cases. I am also a certified civil litigation specialist from the Law Society of Upper Canada.

4. Between 1999 and 2003, I was counsel on a clergy-sex abuse action (the "Swales Action") which resulted in almost eight weeks of trial and a 1.4 million dollar judgment. This action is the only Ontario decision that I know of to establish both vicarious liability and negligence against a Diocese.

5. I have since that decision had an increasingly large number of sexual abuse clients, with a large number of them being victims of clergy-sex abuse.

6. In order to better serve this growing aspect of Ledroit Beckett's practice I hired John Swales as a Client Support Worker. Mr. Swales was one of the clients in the Swales Action. Mr. Swales having endured both the abuse, the depth of its effects and the entire litigation process, including trial, is a unique and capable asset for clients to access.

7. I know of no other Ontario law firm which handles sexual abuse actions which has a former victim and client on staff to assist the clients in non-legal matters.

8. I presently have two associates which are primarily committed to the sexual abuse files and have created a Sexual Abuse Practice Group within Ledroit Beckett to work strictly on sexual abuse work.

9. Ms. Carolyn Brandow, an associate at Ledroit Beckett, who worked on Swales matter, also has experience working on a Provincial

Review having assisted The Honourable Justice R.J. Haines on the 2004 Meat Regulatory and Inspection Review.

10. The Ledroit Beckett Website indicates that one of our areas of focus is Sexual Abuse claims.

11. Additionally, Ledroit Beckett has access to Father Thomas Doyle, an American Roman Catholic priest and Canon Lawyer, who is an internationally renowned expert witness on clergy-sex abuse. Father Doyle is willing to testify on behalf of plaintiffs and did so in the Swales Action.

12. Additionally, Ledroit Beckett has experience in working with psychological experts on the effects of abuse such as Dr. Peter Jaffe, Dr. David Wolfe and Dr. Trevor Smith. I have also retained and become experienced in dealing with forensic accountants and sociologists on the calculation of the economic effects of childhood sexual abuse.

13. I believe to be true the fact that the experience which I and other lawyers and staff of Ledroit Beckett have make it a firm which has considerable expertise in sexual abuse litigation.

14. Additionally, Ledroit Beckett has extensive experience in handling sexual abuse civil litigation arising specifically out of the Cornwall area. For approximately the last 14 months we have had extensive involvement with victims and support workers in the Cornwall area.

CORNWALL CIVIL LITIGATION EXPERIENCE

15. Ledroit Beckett has commenced civil litigation for sexual abuse suffered in the Cornwall area for a number of victims, as follows:

- a. Lalonde v. MacDonald et al. (clergy sex abuse - Diocese of Alexandria-Cornwall);
- b. Renshaw v. MacDonald et al. (clergy sex abuse - Diocese of Alexandria-Cornwall);
- c. Labelle v. Leduc (Leduc was the former Diocese lawyer);
- d. Sequin v. Sabourni et al. (teacher/student abuse - Catholic School Board);
- e. Tyo v. Leblanc et al. (Transport Canada employee abusing children at workplace);
- f. Marsolias v. Hickerson et al. (Manpower employee abusing children at workplace);
- g. [REDACTED] v. MacDonald et al. (clergy sex abuse - Diocese of Alexandria-Cornwall);
- h. F. Vivarais v. Stone et al. (clergy sex abuse - Diocese of Alexandria-Cornwall);
- i. R. Vivarais v. Meunier et al. (clergy sex abuse - Diocese of Alexandria-Cornwall);
- j. Gauthier v. Lefebvre et al. (clergy sex abuse - Diocese of Alexandria-Cornwall);
- k. G.R. v. Lussier et al. (clergy sex abuse - Diocese of Alexandria-Cornwall);
- l. Brisson v. Deslaurier et al. (clergy sex abuse - Diocese of Alexandria-Cornwall); and
- m. [REDACTED] v. Leduc (Leduc was the former Diocese lawyer).

16. Additionally, Ledroit Beckett has taken over previously commenced civil actions for three victims of Ken Sequin, a former probation and parole officer. These victims are as follows:

- a. Robert Renshaw;
- b. Gerry Renshaw; and
- c. [REDACTED]

Pursuant to orders by the Commissioner dated October 12, 2007, March 27, 2007 and January 28, 2009, granting publication bans, this affidavit has been edited.

Exhibit H

PROPOSED BUDGET
(Based on 1500 hours or 50 weeks)

LEGAL FEES	Amount Required From Inquiry
<u>Preparation</u>	
<ul style="list-style-type: none"> • Legal research - Legal counsel 60 hours @ \$180.00 per hour • Documentation review prior to hearing - legal counsel 30 hours @\$180.00 per hour • Provision of documents to Inquiry • Preparations of submissions to Inquiry <ul style="list-style-type: none"> - Legal counsel 80 hours at \$180.00 per hour - Law clerk 30 hours at \$75.00 per hour 	10,800.00 5,400.00 3,000.00 14,400.00 2,250.00
<u>Consultation with Applicants prior to Inquiry</u>	
<ul style="list-style-type: none"> • Legal counsel 30 hours @ \$180.00 per hour • Law clerk 30 hours @ \$75.00 per hour 	5,400.00 2,250.00
<u>Attendance at Inquiry</u>	
<ul style="list-style-type: none"> • *Counsel fees <ul style="list-style-type: none"> - Senior legal counsel in supervisory capacity 50 hours @ \$220.00 per hour - Legal counsel in attendance 1500 hours @ \$180.00 per hour - Junior legal counsel in attendance 750 hours @ \$135.00 - 1 law clerk 1500 hours @ \$75.00 per hour • Travel <ul style="list-style-type: none"> - 2 times 20 return trips home - 614kms at \$0.50 per km - (Alternatively, train (\$450.00 return per adult) and car rental (\$350.00 per week for 50 weeks = \$35,500.00) • Accommodation <ul style="list-style-type: none"> - Rental Accommodation for 50 weeks at \$1,000.00 per month times 2. - (Alternatively, 2 hotel rooms for 250 nights @ \$100.00 per night = \$50,000.00) • Meals 	22,000.00 270,000.00 112,500.00 12,280.00 24,000.00

- 3 meals per day for 250 days @ \$35.00 each	17,500.00
• Meeting expenses	10,000.00
• Printing, fax, mail & telephone expenses	5,000.00
<u>The Retainer of Medical experts</u>	
• 3 experts @ \$2500 per day for 15 days	112,500.00
• TOTAL	<u>\$629,280.00</u>

*It is respectfully submitted that given the complexity of the issues and the large number of clients who have come together to make this application, the applicants would require more than one legal counsel.