

Vancouver, B.C.

February 14, 2012

(PROCEEDINGS RECONVENED AT 9:30 A.M.)

THE REGISTRAR: Order. The hearing is now resumed.

MS. TOBIAS: Mr. Commissioner, Cheryl Tobias appearing for the Government of Canada.

THE COMMISSIONER: Yes.

MR. DICKSON: Mr. Commissioner, Tim Dickson for the Vancouver Police. Mr. Hern just sends his regrets. He's in court on another matter.

THE COMMISSIONER: No, I understand that.

MS. TOBIAS: Mr. Commissioner, I'm going to refer -- yesterday when we adjourned I was taking you through the affidavit of Sarah Armstrong, which has been marked as Exhibit 96NR in these proceedings, and if you will recall, we had gotten to about Exhibit "P", and that was the letter that explained -- that attached the policies dealing with the various business rules and policies respecting e-mail retention, and Exhibit "Q" is the notice or the e-mail that you've seen before that indicates -- that gives the instructions in October of 2010 before -- basically as soon as the inquiry was announced to retain documents.

So where I'd like to go next is Exhibit "R",

1 and as you'll recall from yesterday, the point of
2 a lot of this is that the way in which disclosure
3 has been made is the product of many discussions,
4 much interaction with commission counsel, and
5 that's what you would expect to decide upon the
6 documents, the subjects, and the procedures that
7 would best meet the needs of this inquiry. So
8 you'll see this letter at Exhibit "R" is dated
9 March 7th of 2011, and it was to set up a meeting
10 with your counsel to make plans for the months
11 ahead, and you'll see in the last sentence of that
12 letter that the agenda that we set out was not
13 meant to be exhaustive, and we invited commission
14 counsel to add matters of interest to them that
15 may not be on that list.

16 If you can go to Exhibit "S", after the
17 meeting took place there was agreement between the
18 parties as to how this matter should be
19 approached, and this dealt with categories of
20 documents, and I am going to look at this in a
21 little bit of detail because some of these
22 categories are highly relevant to this particular
23 application. So you'll see on page 1 the letter
24 is dated March 18th and refers to what the
25 discussion had been on -- at the meeting on March

1 11th, and the first document category is file
2 reviews, and you've heard this referred to a
3 number of times, and so this is one place where
4 there is an enormous amount of material, and after
5 due consideration both your counsel and we felt
6 that the detailed information, although it was on
7 the file, would be of no particular assistance to
8 you in your determination, and as I mentioned
9 before and as is set out in the letter, those
10 files, many of them related to ongoing
11 investigations, which it was very important to
12 protect the integrity of those investigations. So
13 the bottom line on that is you see in the last
14 sentence:

15 ...we plan to provide a detailed summary of
16 the file review process together with a
17 selection of the files reviewed under this
18 process.

19 So that -- and I can tell you that that file --
20 that summary process, coming to a fair summary in
21 itself was an enormous amount of work for the RCMP
22 and DOJ teams.

23 And similarly, you've heard about
24 unidentified human remains. That was dealt with.

25 Now, the next item is one of considerable

1 importance. It's referred to as the 87 cases in
2 Project Evenhanded, and this is where it set out
3 exactly what those were, and you'll see the
4 significance of it. These were -- as it says:

5 These are document collections specifically
6 relating to each missing person on the
7 missing women poster, Pickton and other high
8 profile witnesses.

9 So there are a large number, and each case was
10 voluminous, and, again, this is a situation where
11 the information that was collected together was
12 largely duplicative of information produced within
13 the Project Amelia files, which were going to be
14 disclosed independently, and so this was a place
15 where the commission would decide if it would
16 require disclosure of specific cases.

17 Next, notebooks, and you've heard chapter and
18 verse about that today. And, again, this is one
19 place where if -- you've heard it said that really
20 what should be produced to your commission counsel
21 should be essentially all the notebooks of all the
22 officers involved in the investigation. Now, that
23 would give you an enormous amount of material,
24 most of which would not pertain to your
25 determination at all and would require an enormous

1 effort in terms of the vetting protocol that had
2 to be undertaken. So what -- as it said there,
3 that would be an inefficient use of resources to
4 review.

5 The other part about the notebooks is that
6 the essence of the information was usually
7 reproduced in the logs, the 1624s, which were
8 being produced, so again you're in a situation
9 where there's a lot of repetition and a lot of
10 effort needed to produce repetitious material, so
11 what the agreement was, as is set out on the top
12 of page 2, was that "a more sensible approach is
13 to limit production to those notes written by key
14 investigators and the commission will make
15 targeted requests for the notes of specific
16 officers within defined time frames". That's what
17 we set out to produce, not every single shred of
18 note, and, in my submission, that is what this
19 inquiry required.

20 I'm not going to take you through the other
21 particular categories, but you'll see at the last
22 paragraph above the heading "Commission's
23 Priority":

24 Finally, if, flowing from the disclosure of
25 the above, you wish to see particular

1 documents, you will request them and we will
2 do our best to provide them.

3 And that has been the arrangement and the way
4 things have gone throughout. If something is
5 produced and the commission counsel wishes more,
6 they had only to ask for them. Now, again,
7 because of the vetting process and the need
8 sometimes to undergo extensive searches for
9 material, the request could not be satisfied
10 immediately. Sometimes they took some time to do,
11 but we always endeavoured to do that.

12 And so the commission also set out a priority
13 list for these particular kinds of documents, and
14 so the list that you see there are the same
15 categories of documents, and the commission
16 decided which they wanted to get first, second,
17 third, and so forth. And as agreed, as set out
18 there, again, requests by DC Evans will take
19 priority over the commission's requests.

20 Next I'd like to take you to Exhibit "T",
21 which is a chart that sets out packages of
22 disclosure that were made. And I am not going to
23 ask you to look through them line by line, but I
24 will ask you to note the extensive nature of the
25 disclosure that was made, and specifically you

1 will see, if you look at the beginning of it,
2 there's -- the first few pages are disclosure that
3 was made routinely, and you'll see on the left-
4 hand column there's a note of the date that it was
5 requested by the commission and on the far right-
6 hand column the date it was disclosed by the
7 commission so that that gives you a considerable
8 amount of information. Some of -- a lot of it
9 you'll see there's nothing in the date requested
10 by the commission or required by the commission
11 because it was -- the disclosure was made not
12 responsive to particular commission requests.

13 If you go through about four pages, you'll
14 see a heading "DC Evans Requests". If you can
15 turn that up. It's the fourth page. I apologize,
16 these pages aren't numbered, but it's the fourth
17 page in the tab.

18 THE COMMISSIONER: What's the heading?

19 MS. TOBIAS: "DC Evans Requests".

20 THE COMMISSIONER: All right.

21 MS. TOBIAS: And so -- and you'll see quite a number of them
22 there. You'll see the date of disclosure there
23 and give you an idea of the kinds of things that
24 were requested.

25 And then another page following that you'll

1 see a heading "Policies". Do you have that?

2 THE COMMISSIONER: Yes.

3 MS. TOBIAS: At the bottom of the page. And as you can see
4 under -- there's a column "Total # of Documents"
5 and another "Total # of Pages". Some of these
6 policies were very lengthy and had to be obtained
7 by audits. So there's Ottawa policies, there's
8 divisional policies, and there's detachment
9 policies. And if you turn over the page you'll
10 see at the top of the page the reference to
11 Coquitlam Detachment Unit Supplements and a large
12 number of pages of policy there.

13 Then you will see another heading called
14 "Witness Packages", and I'd like to take a minute
15 to tell you what those were about. Those were
16 documents gleaned through interviews by our team
17 of specific witnesses, the ones that you see
18 there, documents particularly pertaining to those
19 witnesses that may not have been on the original
20 file, and they also often contained "will says",
21 not because we were obliged to provide "will
22 says", but because, again, as I told you before,
23 the questions that you have to answer in this
24 inquiry are not the kinds of documents that are
25 created in an investigative file that's intended

1 to prove an offence. So, for example, why certain
2 decisions were made or not made. So where there
3 appeared to us at that point to be relevant
4 information that the person had in his or her head
5 that was not necessarily documented, that's what
6 the "will says" were for, and to the best of our
7 ability, where "will says" were prepared they were
8 provided to DC Evans before her interviews.

9 So now I'd like to ask you to turn up the
10 last -- the last exhibit is a series of letters
11 that I'm not going to take you through. I am
12 going to take you to one of them, but I'll just
13 tell you what they are. They are a series of
14 letters, and this is explained in the affidavit,
15 that were periodic updates to the commission as to
16 the status of disclosure at that point. And so
17 that's what these are all about, saying how things
18 are going and what the estimated time is for
19 various packages of disclosure that were in
20 process.

21 I'd ask you to turn to the letter dated
22 November 2nd, 2011. Actually, that's the next
23 exhibit. I do apologize. But it's a letter sent
24 to the commission. Have you got that?

25 THE COMMISSIONER: Yes.

1 MS. TOBIAS: And so this is a lengthy letter, and it deals
2 first with Cara Ellis and Tiffany Drew, and my
3 colleague Mr. Majawa is going to make some
4 specific comments about some of this, but I'd ask
5 you to turn to page 4 of the letter. And what I
6 should have pointed out was that this letter, this
7 particular letter is a letter in response to the
8 commission, who had sent us a chart listing all of
9 Mr. Ward's disclosure requests and the status of
10 that request at that point, and so when you see
11 requested item 17, 35 and 53, e-mail
12 communications, those are referable to the chart
13 that the commission had sent us. And the very
14 fact that there was an item 53 tells you something
15 about the length and complexity of what was being
16 dealt with at that point. We wished to
17 elaborate -- as we said:

18 ...you state in the "Disclosure Made" column
19 that "The RCMP does not have any other
20 e-mails other than what has been produced."

21 We said:

22 As a preliminary matter, it should be noted
23 that we have not treated e-mails as a
24 specific disclosure category. Instead, they
25 are simply another type of record which, if

1 they contain non-privileged information that
2 is responsive to a demand for disclosure...
3 will be disclosed on request. Because the
4 Commission may make future requests for
5 material relating to new subject areas, it
6 will never be possible for the RCMP to
7 categorically assert that "it does not have
8 any other e-mails other than what has been
9 produced".

10 And so then we go on to explain again the process.

11 ...although the RCMP has made best efforts to
12 locate whatever relevant e-mails exist, the
13 process is not perfect.

14 and relates that recently, in the course of
15 preparing disclosure of the file workload at the
16 Coquitlam Detachment, the RCMP members while
17 reviewing an unrelated homicide file came across a
18 hard copy of an e-mail chain regarding a potential
19 submission for a certain kind of funding which
20 referred to the Pickton inquiry. So that's really
21 a perfect example. In a completely unrelated file
22 there was a hard copy of an e-mail that was not --
23 that was relevant but was not found within the
24 Pickton files. That sort of thing happened, and
25 it will continue to happen, and our pledge is that

1 when it does happen that we will immediately take
2 steps to make -- to make disclosure of the
3 relevant item.

4 So I want to go back to a couple of matters
5 that arose yesterday, a couple of questions that
6 you asked me, and I think that it would be helpful
7 if I elaborate on them a little bit more than I
8 did yesterday. One is that you asked me why we
9 don't deal with counsel directly. Well, you know,
10 the answer is sometimes we do, but as you saw from
11 my reference, my brief reference to the chart, 53
12 items on the chart sent to commission counsel.
13 When there's a large scale request or,
14 alternatively, when there's a request the
15 relevance of which is perhaps dubious, our first
16 objective is to wait to see what commission
17 counsel requests of us, and that is because, of
18 course, given the rules of procedure set out for
19 this commission, the procedure is that a
20 participant asks commission counsel for a
21 document, and if commission counsel decides that
22 the document should be produced, the commission
23 counsel will take steps to obtain it from the
24 relevant party. So, in my submission, that is the
25 appropriate and most efficient way of dealing with

1 the matter instead of multiple discussions and so
2 on and so forth.

3 There's one other statement that was made,
4 and I don't quite remember who, but an exchange
5 yesterday that is troubling and that I want to
6 address, and that is the suggestion that because
7 this matter -- because Pickton had been put on
8 trial that somehow all of the files that are
9 relevant to this inquiry should be just sitting
10 there waiting to be copied and easy to produce.
11 Well, nothing could be further from the truth.
12 The fact of the matter is that your inquiry --
13 that Pickton was tried for a particular set of
14 charges. That's one thing. Secondly, your
15 inquiry covers a whole lot more than what was
16 required to prove Pickton guilty, and more
17 investigations than ever went to trial, and so --
18 and finally, as I said yesterday, your inquiry
19 requires answers of the sort that are not
20 necessarily found on an investigative file.
21 They're found in policy documents. They're found
22 in other files. They're found in the brains of
23 people who know things that were never reduced to
24 writing.

25 So disclosure in this matter has been neither

1 easy nor quick. The Government of Canada has put
2 enormous resources to work in getting the
3 disclosure to you. The chart that I took you to
4 reveals that at the end of the day something like
5 close to 110,000 pages of vetted disclosure was
6 made, and you will recall from having seen it
7 happen that vetting really in a lot of ways has to
8 be done twice, once to give -- and the reason for
9 that is to give the participants the maximum
10 information possible. If it had been done just
11 the once so that it's suitable both for the
12 participants and the public, that would have been
13 vastly easier, less expensive and less time-
14 consuming, but it had to be done twice.

15 And the RCMP has now since the inquiry was
16 struck dedicated a large team of investigators,
17 deployed them from other duties to serve the needs
18 of this commission, as has the Department of
19 Justice, so -- and I cannot overemphasize that
20 cooperation with this inquiry requires the
21 scrutiny of a huge amount of material, and it's
22 simply not possible for the teams, as large as
23 they are, to read each and every document that
24 might exist. It's been a matter of calculating
25 where relevant documents are likely to be and

1 going there. So again -- and seeking out relevant
2 material. So it's a process. It's an ongoing
3 process. It's not a perfect process, nor can it
4 be.

5 I want to turn to the commentary that's been
6 made about what DC Evans said in her evidence.
7 Mr. Chantler took you to those references, and as
8 I understand it, to convince you that what she
9 said is some indication that there is material out
10 there that has been withheld from this commission.
11 Well, she doesn't say that relevant material was
12 withheld from her. She doesn't say that in her
13 evidence, and she didn't say that in her report.
14 So she addressed two specific matters relating to
15 the disclosure of the materials that she had
16 received. She said she was surprised that she
17 didn't get more e-mails, but she didn't know why,
18 and I am going to take you to that reference
19 because it's been referred to in passing so many
20 times I think it should be dealt with, and that
21 she was frustrated at times by the pace and the
22 format of the disclosure that she received.

23 The Government of Canada's position is that
24 DC Evans' requests for disclosure were never
25 refused. There were times when documents didn't

1 exist or couldn't be found or were difficult to
2 locate, and that's a vastly different matter.

3 I have -- my colleague is going to hand up to
4 you copies of selections from the transcript of
5 her evidence before this commission and also
6 selections from about three pages of her notes,
7 which were marked as Exhibit O in these
8 proceedings. So I'd ask you to look first at the
9 transcript, and this is the transcript from
10 January the 17th, 2012, at page 7, and I believe
11 it's at the bottom of the page.

12 THE COMMISSIONER: Where are you here?

13 MS. TOBIAS: January 17th. Page 7 of the transcript. Do you
14 have that?

15 THE COMMISSIONER: I don't have any -- I don't have any date on
16 here.

17 MR. MAJAWA: My apologies. I missed one.

18 THE COMMISSIONER: There's no page 7. I've got page 125.

19 MS. TOBIAS: Apparently there was one that was missed. I'm
20 sorry.

21 THE COMMISSIONER: Oh, I see. All right. Okay. Now I have
22 it.

23 MS. TOBIAS: Do you have page 7?

24 THE COMMISSIONER: Yes.

25 MS. TOBIAS: 7 and 8. And so I asked her about receiving

1 redacted documents, and she agreed with that, and
2 at the bottom I asked in terms of the documents
3 which she had access to:

4 ...there were a large number of documents,
5 tens of thousands of pages in fact, that
6 you received without particularly asking
7 for them?

8 She said:

9 That's correct.

10 Q And the arrangement was that anything else
11 you wanted to see you could ask for and
12 receive them?

13 A That's correct.

14 Q And you did receive the documents that you
15 requested as they were available?

16 A As they were available, yes.

17 Q Some of the documents that you asked for
18 you were told did not exist or could not
19 be obtained?

20 A Yes.

21 Q Those were relatively few?

22 A Yes, I would say so.

23 In my submission, that is what really encapsulates
24 what went on between DC Evans and the government.

25 I'd like you to refer to the transcript of

1 January the 18th, 2012. You should have page 114.

2 THE COMMISSIONER: Yes.

3 MS. TOBIAS: And this is where Mr. Ward was asking DC Evans
4 about e-mail specifically, and she was asked about
5 problems getting e-mails, and she -- the question
6 was:

7 And that wasn't because the RCMP didn't
8 use e-mail, that's because they wouldn't
9 be produced to you for some reason, right?

10 A I don't think I can speak to the reasons
11 why I didn't see them. I just know I
12 didn't see a lot of them.

13 And she goes on to say that she was frustrated at
14 the disclosure she was receiving from the two
15 police forces from time to time.

16 Then he again at page 115 took her to
17 problems with disclosure, and she said that she
18 was frustrated by the format she was receiving it
19 in, and that is a somewhat ambiguous comment, but
20 I will parenthetically remark that at times, you
21 know, you have to take your documents as you get
22 them, and we can only pass on what exists.

23 Later down there she says, again with respect
24 to e-mail communication, she said:

25 I can only put my mind to what I observed

1 and what I read, and I couldn't say that
2 there was documents out there that were
3 not being disclosed to me.

4 On page 116 she observed that she saw a lot
5 of documentation in e-mail -- I think that was
6 e-mails from the Corporal Connors and Detective
7 Shenhers but not a lot of communication from
8 senior management.

9 Now, again, this pertains to e-mails, and it
10 seems that Mr. Ward and others are somehow
11 convinced that there must be a lot of e-mails out
12 there that are being deliberately withheld. DC
13 Evans' evidence is certainly no support for that.
14 The various e-mail policies have been -- have been
15 sent out. They were disclosed to the commission.
16 I've explained them to you, and that is the reason
17 for the amount of e-mail that has been received.

18 Now, at page 117 -- or, sorry, page 118, this
19 is where Mr. Ward took DC Evans to her notes that
20 has been referred to by my friend Mr. Chantler in
21 urging you that -- again, one of the pieces of
22 what he says are evidence urging you to conclude
23 that somehow there is a volume of material that is
24 being withheld from this commission. So in order
25 to interpret this evidence I think it's useful for

1 you to have the note that's referred to in front
2 of you, and that's what I've put forward, the
3 extract from Exhibit O. You'll see the cover page
4 from that is the cover page of her notes from the
5 21st of June to the 14th of November, 2011, and
6 the page after that is the notes headed Wednesday,
7 the 17th of August, '11. Do you see that?

8 THE COMMISSIONER: Yes.

9 MS. TOBIAS: So she notes -- the entry at 13:45, notes of "on
10 plane review", "E Valley", "172 pages" and so on
11 and so forth, and then she has the note, "Address
12 issue of late disclosure in Report." I'll pause
13 to note that I didn't see anything in the report
14 about late disclosure or any other such problem.
15 And then she says, "Just received notes of Gary
16 Bass and Jim Brown," and then there's a reference
17 to McCarl, and that's when she has the comment
18 "Ridiculous". Then she has a note that she
19 reviewed the Bass notes. And over the page on the
20 13th -- sorry, the 18th of August you'll see at
21 0900 hours, "Review e-mail copy of Bass CV," and
22 at 1:30, "Interview Gary Bass." So that happened
23 the next day. And the day after that at 13:00, on
24 the 19th of August, she's got a note, "Interview
25 Jim Brown." Jim Brown, I'll tell you, was one of

1 the officers who was involved in some of the
2 surveillance that occurred in August, I believe,
3 of 1999.

4 So if you can go back now to the transcript,
5 she's taken -- she's asked about the issue --
6 "address issue of late disclosure in report", and
7 further down she's asked:

8 And what you're referring to there is you
9 were getting some material after you had
10 conducted interviews in which the material
11 would have been very, very helpful?

12 She says yes, but as you've seen, that didn't
13 happen with the Bass and the Brown materials, and
14 in our calculation that happened rarely, if at
15 all, so I'm not -- and a lot of that is visible
16 from the list of the witness packages, keeping in
17 mind that the witness packages were additional to
18 the large body of disclosure. It's not as though
19 everything that pertained, for example, to Gary
20 Bass was dumped on her the day before. There had
21 been a large amount of disclosure, and there were
22 some things specific to Gary Bass that had been
23 obtained by us in interviews with him and so on
24 that were provided at that date. It was
25 supplementary information. It was not the whole

1 body of information.

2 And so she says further down that it would
3 appear that she was frustrated that day and that
4 she reviewed thousands of e-mails and so on and so
5 forth.

6 So, again, it's not the case that the way
7 disclosure was made to her provides the slightest
8 basis to conclude that material was being held --
9 withheld from this commission in any kind of
10 general way, or any kind of specific way for that
11 matter. What I'm alluding to is that, as you saw,
12 Mr. Chantler has made a point of having his --
13 normally disclosure applications are for specific
14 items. This application is for all relevant
15 notes, for example, including but not limited to.
16 I can't answer an application that says, "Well,
17 you haven't given me all relevant notes." What I
18 am going to say to you is we have given the notes
19 that we are aware of that are relevant and
20 specifically as relates to notes -- the notes that
21 as agreed with commission counsel they would ask
22 and we would provide.

23 So I am going to sit down now and let my
24 colleague take you to the specific items, there
25 are about half a dozen of them, that pertain to

1 the RCMP in the application that my friend has
2 brought.

3 THE COMMISSIONER: All right.

4 MR. MAJAWA: Yes, Mr. Commissioner. It's Andrew Majawa for the
5 Government of Canada. As my colleague Ms. Tobias
6 said, I'll be dealing with the specific requests
7 made in the amended notice of application, which
8 we received on this past Friday, and as well I'll
9 be dealing with a couple of matters that arose
10 yesterday during my friend's submissions that were
11 not contained in the notice but that -- so we have
12 not had a chance to address in the affidavit
13 particularly but which I can speak to to some
14 extent this morning.

15 So the first matter that I would like to deal
16 with is the request that was made and the
17 submissions that were made by my friend Mr.
18 Chantler in respect of the missing person files
19 for Ms. Sebastian, Ms. Feliks, Ms. Ellis, and Ms.
20 Drew, and that, as I mentioned or as I alluded to,
21 was not included in the amended notice, so we did
22 not have time to address that in the affidavit,
23 but just for your information or for the
24 information of the participants and Mr. Chantler
25 and his clients, both the Sebastian and Feliks

1 files were enclosed with the Pickton cases, the
2 disclosure of the Pickton cases, and when I say
3 cases, I'm referring to what my colleague Ms.
4 Tobias was taking you through, the compilation of
5 documents related to a particular person.

6 THE COMMISSIONER: So when were they produced?

7 MR. MAJAWA: Those were produced on August the 26th, 2011, and
8 the letter, by happenstance, happens to be in the
9 Affidavit #1, which is Exhibit 96NR in these
10 proceedings, and it's Exhibit "U", and the
11 reference to that is found in that exhibit. I
12 don't think it's necessary to go to there, but
13 that's when those two files were disclosed. Now,
14 there were some problems with the disclosure
15 there, some corrupted files, which were brought to
16 our attention. They were re-disclosed properly
17 with uncorrupted files on September the 6th, 2011.
18 And the Concordance IDs for Ms. Sebastian's
19 records is RCMP-064-001953 and 064-002914, and
20 for Ms. Feliks it's RCMP-040-002787. And,
21 actually, all for Ms. Feliks begin with 040,
22 and there's three other ones: 006189, 002792,
23 002960. So those have been disclosed in the form
24 of the cases, which my colleague was explaining to
25 you.

1 With regards to Ms. Drew and Ms. Ellis,
2 Exhibit "V" -- again, this letter was included for
3 a different purpose, but Exhibit "V" of the
4 Affidavit #1 deals extensively with the disclosure
5 of these two cases for these two women, and I
6 think the first thing to note with these two, and
7 I won't take you through all of the details, but
8 the first thing to note with these two is that
9 there were not files for Project Amelia with
10 respect to these women. I understand that there
11 is some difference of understanding as to when the
12 missing person report for Ms. Ellis was made, but
13 from our understanding there was no
14 investigational materials for Ms. Ellis or Ms.
15 Drew until after the terms of reference, and, for
16 instance, Ms. Drew was not reported missing until
17 February 8th, 2002. In any event, this letter
18 goes through quite some detail in the first two
19 pages to explain the type of disclosure that was
20 made with respect to these two women's cases.
21 This letter was dated November the 2nd, and it was
22 written, if I recall correctly, in response to a
23 specific mention of these cases in the hearings.
24 And I would note that on page 2, the bottom of
25 page 2 there is references to the documents having

1 been disclosed. They were disclosed previously.
2 And I would just note that at the bottom, our
3 position is set out at the bottom of page 3, where
4 it states that further to our letter dated
5 November the 1st, 2011 --

6 THE COMMISSIONER: Page 3 where?

7 MR. MAJAWA: Page 3. I'm sorry, I'm in Exhibit "V" of
8 Affidavit #1, Sarah Armstrong.

9 THE COMMISSIONER: Oh, I see.

10 MR. MAJAWA: It's a letter dated November 2nd, 2011.

11 THE COMMISSIONER: Affidavit?

12 MR. MAJAWA: #1, which would be Exhibit 96. It's the larger
13 one.

14 THE COMMISSIONER: What tab?

15 MR. MAJAWA: Tab "V".

16 THE COMMISSIONER: Oh, I see. Okay.

17 MR. MAJAWA: So as you will see, that's a letter dated November
18 2nd, 2011, and the first -- this is actually
19 written in response to, you'll see in the intro
20 there, a letter from the commission dated October
21 26th which enclosed a chart listing Mr. Ward's
22 disclosure requests and the status of each
23 request. So this was to provide the commission
24 with an update as to the status of particular
25 requests made by Mr. Ward. And just -- if you

1 just turn to page 3, the bottom of page 3, our
2 position with respect to Ms. Ellis and Ms. Drew is
3 that we have disclosed all the relevant and
4 available documents on both Ms. Ellis and Ms.
5 Drew, and then we state there:

6 Should the Commission wish to request
7 specific documents referred to in the missing
8 persons case report documents,
9 keeping in mind again that these cases were
10 investigated post-2002,
11 we would be pleased to consider such
12 requests.

13 And I am not aware of having received any such
14 request from commission counsel to provide those
15 documents, so, in our respectful submission, those
16 have been -- those documents have been provided.

17 So I would then turn to the specific points
18 made in Mr. Chantler and Mr. Ward's application.
19 So that would be in his amended notice, which I
20 believe is in his application brief. I don't have
21 a full copy of the brief, but I have a copy of the
22 notice, which was filed yesterday.

23 THE COMMISSIONER: Just tell me what it is.

24 MR. MAJAWA: So the first one is -- was the request, the
25 general request for members' notebooks,

1 handwritten notes. The general request for
2 disclosure. And I won't go into that any more
3 than my colleague has, but I would point you to
4 one further document with respect to notebooks for
5 your knowledge and for the knowledge of the
6 participants. In Affidavit #2 of Sarah Armstrong,
7 sworn yesterday, which is Exhibit 97, you'll see
8 on page 2 in paragraph 3 she addresses the
9 specific request in respect of notebooks, and
10 attached is Exhibit "A", and for your information,
11 it shows -- if you turn to Exhibit "A", that's a
12 letter dated October the 5th, 2011, and it lists
13 all of the notebooks that have been disclosed by
14 the Government of Canada and the dates on which
15 they were disclosed, and as you can see from that
16 list, the disclosure began in May 2011 and
17 continued through August 2011 for numerous
18 individuals. And as my friend stated, we have
19 made those disclosures -- my colleague stated --
20 we have made those disclosures in accordance with
21 the agreement with commission counsel for targeted
22 requests for specific members and specific time
23 frames.

24 So the second request, the second request
25 from Mr. Chantler and Mr. Ward is for

1 correspondence between Sergeant Connor and Crown
2 counsel relating to the investigation of Mr.
3 Pickton. And, again, if you stay in the Affidavit
4 #2 of Sarah Armstrong, this is addressed at
5 paragraph 4. The bottom line with respect to this
6 as well is that Government of Canada has disclosed
7 all of the documents in relation to this in an
8 unredacted format and have not maintained the
9 privilege that could be claimed over such
10 conversations. And there was an issue with
11 inconsistent redactions over some of those
12 communications. That was dealt with, and on
13 October the 5th, 2011, at Exhibit "C", a letter
14 was sent to commission counsel's office stating
15 that the RCMP does not wish to maintain the
16 solicitor-client privilege that's attached to
17 these communications and listing all of the
18 documents in the newly unredacted documents that
19 were not previously redacted for reference for
20 easy finding.

21 Now, in terms of communications between Mr.
22 Gulbransen and Mr. Connor or Sergeant Connor, my
23 understanding and I believe the testimony was that
24 Sergeant Connor provided him with -- provided Mr.
25 Gulbransen with the 1624s that were -- that he

1 maintained on the file, to provide him with those
2 so he could provide an opinion on whether or not a
3 search warrant was appropriate, and as -- on page
4 2 of that letter at Exhibit "C" again the -- pages
5 1 to 46 of the continuation report, which is what
6 then Corporal Connor gave to Mr. Gulbransen, were
7 again highlighted, and, of course, those had
8 already been disclosed much earlier, in fact, in
9 the first -- the very first disclosure. If you
10 look above in that chart there, the Concordance
11 page IDs, you'll see RCMP-001, a listing of all of
12 those documents there. That first three digits is
13 a reference to the batch of disclosure that's
14 received. That's the very first batch of
15 disclosure. So those were disclosed at the very
16 outset. So, in my submission, there is nothing
17 further to disclose there.

18 In respect of the third point, which is a
19 request for correspondence between Sergeant Connor
20 and Sergeant Blizzard relating to the investigation
21 of Mr. Pickton as a suspect, I again direct you to
22 Affidavit #2 of Sarah Armstrong in paragraph 5,
23 which is on page 2. And my understanding of Staff
24 Sergeant Connor's testimony is that he sent the
25 1624s to Mr. Blizzard and then as far as he knew

1 that Mr. Blizzard put those 1624s on the Unsolved
2 Homicide Unit's file. That Unsolved Homicide Unit
3 file was disclosed, and the Concordance ID number
4 is listed here in this affidavit. This was
5 explained to the commission quite recently in a
6 letter dated February 10th, 2012. And, again, any
7 e-mails that may have been actually accompanying
8 the forwarding of those 1624s would have been in
9 the discretion of the investigator to maintain on
10 the file. I don't think anything should be taken
11 from the fact that there may not be an e-mail
12 enclosing those 1624s on the file. It's the 1624s
13 themselves that were the important part of that
14 communication, not necessarily the e-mail that
15 enclosed them. So, in our submission again, that
16 area of request has been dealt with.

17 Now, the next request is for notes and
18 records of Detective Constable Lori Shenher that
19 were created during her tenure as an investigator
20 on the Missing Person Unit and later provided to
21 Project Evenhanded. Now, this is not addressed in
22 the affidavit, and I'll tell you the reason why.
23 We are working on providing a somewhat more
24 fulsome answer to give you exactly, but I can tell
25 you the bottom line. When Project Evenhanded

1 obtained the records of the Vancouver Police
2 Department from Project Amelia, there were a
3 number of tips that were missing, that were blank
4 or that were empty. Much effort was undertaken to
5 locate those tips and determine what was in them.
6 Lead sheets were found for most of those missing
7 tips, and that -- my understanding of a lead sheet
8 is that's a summary tasking sheet but not
9 necessarily the investigative material that went
10 with it. Now, everything that we have that we
11 ended up -- that the RCMP ended up being able to
12 locate in respect to the tips that were missing
13 when received from Project Amelia have been
14 disclosed. There are no other documents with
15 respect to that that have not been disclosed. So
16 again, in our submission, request 2(d) with
17 respect to Lori Shenher's notes has been satisfied
18 to the extent that it can be. If there were notes
19 in those -- in those tips that were missing that
20 were never able to be located, then they are just
21 not available. We have disclosed everything that
22 we have with respect to that.

23 The next request is with respect to the notes
24 and records of Constable Sylvestri which relate to
25 his attendance at the Pickton residence in May of

1 1999. This is addressed in Sarah Armstrong's
2 Affidavit #2, and that is at paragraph 6 on page
3 2. The letter was written on December the 5th,
4 2011, and that's found at Exhibit "E". And on
5 page 2, with respect to Constable Sylvestri, it is
6 noted on the second paragraph under the heading
7 "RCMP members' notebooks":

8 We can advise that the RCMP has confirmed
9 that no notes exist for Constable Sylvestri.
10 So once again we have provided in response -- and
11 this letter on December the 5th was in response
12 to, as you will see in the introduction, in
13 response to providing an update with respect to
14 disclosure requests made by both the commission
15 and Mr. Ward, and we provided that response.
16 There are no notebooks for Constable Sylvestri.

17 Now, before I leave this topic of the visit
18 to the Pickton residence in May of 1999, it's
19 necessary to go back to something that was
20 referenced by my friend Mr. Chantler yesterday.
21 He took you to Exhibit 76 of the Robin Whitehead
22 affidavit. If you could turn that up, please, Mr.
23 Commissioner.

24 THE REGISTRAR: Is that an exhibit, marked as an exhibit?

25 MR. MAJAWA: It is an exhibit.

1 THE COMMISSIONER: Robin Whitehead.

2 MR. MAJAWA: It would be Exhibit 95.

3 THE COMMISSIONER: 95?

4 MR. MAJAWA: I believe it's Exhibit 95. And it's tab 76 or
5 Exhibit 76.

6 THE COMMISSIONER: Tab 76?

7 MR. MAJAWA: Yes, Mr. Commissioner, tab 76.

8 THE COMMISSIONER: All right. Yes. Go ahead.

9 MR. MAJAWA: This is the Project Evenhanded Task Detail Report
10 that Mr. Chantler took you to yesterday as an
11 example of disclosure that was recently received
12 that he says is very material, and there's a
13 reference that he took you to with respect to one
14 of the constables who attended at the Pickton
15 residence to one of the 911 hang-up calls where he
16 said -- it's stated in this first page that he
17 approached the barn and inside the slaughterhouse
18 he observed some live pigs and a man standing
19 beside the table and he was wearing an apron
20 covered in blood, but it's necessary to go on
21 through this document to clarify something that
22 was not brought to your attention by Mr. Chantler.
23 At the very bottom of that page it's noted:

24 Immediately following his meeting with
25 Constable Lenger, Constable Procyk discussed

1 the matter with Constable Vong in private.
2 Constable Vong advised that Constable Lenger
3 had never mentioned a "second" male in the
4 slaughter house in the past to him.

5 If you turn to page 6 of this task report, the
6 entry for May the 5th, 2003, which is about
7 halfway down the page.

8 THE COMMISSIONER: Yes.

9 MR. MAJAWA: There's an entry there where Constable Cater and
10 Constable Procyk have a conversation and Constable
11 Cater advises that in March 2002 he had a brief
12 encounter with Constable Lenger and where
13 Constable Lenger mentioned that he had attended
14 the Pickton farm in response to a 911 call.

15 Constable Cater further advised that during
16 their discussion, Constable Lenger never made
17 mention of a man in the slaughter house with
18 a knife.

19 And then following that there's a consultation
20 that occurs between Constable Procyk, Sergeant
21 Walker, Inspector Adam, and Constable Lenger to
22 express concerns regarding this account, and
23 Constable Procyk advises Constable Lenger that he
24 was particularly concerned that Constable Lenger
25 had only mentioned details of a second male and

1 never previously mentioned it to Constable Vong
2 nor Constable Cater.

3 Constable Procyk further advised that the
4 information he had provided to Constable
5 Procyk was inconsistent with Constable
6 Procyk's file knowledge.

7 THE COMMISSIONER: So where does all this come from then about
8 the second person and the knife and the blood?

9 MR. MAJAWA: Well, I don't know where it comes from except that
10 Constable Lenger on the next page --

11 THE COMMISSIONER: Well, it's in the RCMP report, though, isn't
12 it?

13 MR. MAJAWA: No. If you'd just let me take you to the next
14 page, Mr. Commissioner.

15 THE COMMISSIONER: All right.

16 MR. MAJAWA: On the next -- the paragraph -- the second
17 paragraph.

18 THE COMMISSIONER: Page 7?

19 MR. MAJAWA: We're on page 7, yes.

20 THE COMMISSIONER: Okay.

21 MR. MAJAWA: Actually, I'll just continue reading what was
22 advised to Constable Lenger. He was advised of
23 the importance of reporting only accurate
24 information, and he cautioned him not to draw
25 conclusions or make assumptions.

1 Constable Lenger agreed that he had made
2 assumptions concerning the events of
3 2001.10.22 and that the information he had
4 reported to Constable Procyk thus far was not
5 accurate.

6 Constable Lenger clarified that, in fact, he
7 did not recall the 'second' male possessing a
8 knife and only recalled that the male was
9 "around the barn" rather than in the barn,
10 and then in brackets in the slaughterhouse,
11 as previously stated. Constable Lenger
12 further advised that the man was likely
13 wearing dirty overalls rather than a bloody
14 apron.

15 So Constable Procyk then advised that a formal
16 interview would be conducted. And then at the
17 bottom there Constable Procyk gives his opinion
18 that based on the description provided by
19 Constable Lenger and based on Constable Vong's
20 recollection of events it's Constable Procyk's
21 belief that Constable Lenger spoke with Dave
22 Pickton in the area of the slaughterhouse on that
23 night.

24 The statements that are mentioned there have
25 been disclosed, the full statements of all of

1 those officers, and I think it's -- we should all
2 keep in mind that at the time these statements
3 were being made in 2003 the objective was
4 prosecuting Pickton for murder. There would be no
5 advantage to the RCMP to try and get anything more
6 exculpatory for Mr. Pickton at the time. That
7 wouldn't make any sense. So the objective here
8 was to ensure that the information that was being
9 conveyed was accurate so as to not compromise the
10 prosecution of Mr. Pickton.

11 The next specific request -- actually, sorry,
12 before we leave Exhibit "E", which you may still
13 have turned up in Exhibit 97, which is Affidavit
14 #2 of Sarah Armstrong -- I'm not sure if you still
15 have Exhibit "E" turned up. It's a December 5th,
16 2011 letter.

17 THE COMMISSIONER: Yes. Go ahead.

18 MR. MAJAWA: On page 3 of that letter I just wanted to echo my
19 friend Mr. Hern's comments with respect to the
20 records that have been requested from Mr. Ward
21 that were mentioned by Ms. Lynn Frey. We too
22 requested those records and have not seen a
23 disclosure of those.

24 So the next point that is raised by Mr.
25 Chantler in his amended notice is records in the

1 possession of the RCMP relating to allegations
2 made by Corporal Catherine Galliford. Now, we
3 have responded to the commission with respect to
4 our position on this. If you -- in Exhibit 97,
5 the Affidavit #2 of Sarah Armstrong, if you would
6 turn up paragraph 7, which is on page 3 of the
7 affidavit.

8 THE COMMISSIONER: Tell me what it says. Tell me what the
9 response is.

10 MR. MAJAWA: The response is as set out in the letter at
11 Exhibit "F", which is that Corporal Galliford's
12 allegations are currently under internal
13 investigation by the RCMP, and we advised the
14 commission that once this internal investigation
15 is complete that we can then further discuss the
16 question of disclosure of that investigative file
17 at that time, but the investigation is ongoing.
18 There are privacy rights of the individuals that
19 are engaged here. There are documents being
20 created at this time which, of course, their
21 production of could cause a chilling effect on.
22 And counsel is free to ask questions as they
23 relate to this issue as long as they remain within
24 the commission's terms of reference and
25 constitutional limitations, but I do note that --

1 THE COMMISSIONER: You're telling me that if Galliford is
2 called they can ask these questions of her.

3 MR. MAJAWA: Certainly, and -- as far as they are within the
4 terms of reference. I would just note that
5 Catherine Galliford began on Project Evenhanded in
6 December of 2001, about two months or so before
7 the terms of reference of this commission are
8 limited and before Pickton was arrested. So there
9 will be likely some areas where the terms of
10 reference of this commission are not applicable to
11 her testimony.

12 THE COMMISSIONER: All right.

13 MR. MAJAWA: And the last request is for -- or the last two
14 requests, (g) and (h) in Mr. Chantler's motion or
15 application, are for videotapes of the Pickton
16 interview conducted in February 19th, 20th, and
17 23rd of 2002 and of cell-plant video. As noted,
18 these are outside the terms of reference. The
19 transcripts, I understand, have been disclosed.
20 We have -- that being said, that they're out of
21 the terms of reference, we do not have a problem
22 with disclosing them, but you should be aware that
23 it will take significant time to have these video
24 recordings vetted. I'm told there's 50 hours of
25 videotape.

1 THE COMMISSIONER: 60?

2 MR. MAJAWA: 50, five zero.

3 THE COMMISSIONER: Oh, 50.

4 MR. MAJAWA: -- hours of video involved in these interviews,
5 all of which needed to be vetted, particularly for
6 things such as the undercover operator's identity.
7 That must, of course, be maintained. There are
8 other -- it has to be reviewed entirely for
9 vetting, and there's only very limited machinery
10 that can do that. So my understanding is it will
11 take upwards of three weeks for those videos to be
12 able to be properly vetted and produced, but if
13 that is something that this commission would like
14 disclosed to it, then we will oblige.

15 THE COMMISSIONER: Okay.

16 MR. MAJAWA: That concludes the main areas that are requested
17 of us. I would note that in this application
18 there was also a request made at paragraph 9 of
19 Mr. Chantler's notice that the Organized Crime
20 Agency of British Columbia and the Combined Forces
21 Special Enforcement Unit of BC deliver a number of
22 documents, which are set out very generally in
23 relation to investigations into David Pickton and
24 Hells Angels. I frankly don't see the relevance
25 of this material, and we await your direction with

1 respect to that, but I just want you to be aware
2 of my understanding of the legal entities that are
3 involved here. My understanding is that the
4 Organized Crime Agency of British Columbia no
5 longer exists. It was an agency of the provincial
6 government. Now CFSEU, or the Combined Forces
7 Special Enforcement Unit, would have subsumed
8 that. That is an RCMP-led joint task force, and
9 it has a joint management board subject to RCMP
10 policy and procedures. But I will leave that to
11 you, Mr. Commissioner, to decide the relevance of
12 that request. We, frankly, just do not see it.

13 So I'm about finished, and I note the time.
14 I don't think -- I only have a couple of minutes
15 left, so I think it's probably advisable to
16 continue and just complete. One final point in
17 respect of the allegations of -- Mr. Ward has made
18 in respect to the Government of Canada and other
19 institutional participants in their approach to
20 this process and the process of document
21 disclosure. I would just note that in his cross-
22 examination of Dr. Rossmo, and you may recall
23 this, it was on January the 25th, Mr. Ward made
24 fond mention of a concept known as Occam's razor,
25 and simply put, that concept is that the simplest

1 explanation is most likely the -- is the most
2 likely one until evidence is shown to prove the
3 contrary, or, as Mr. Ward actually put it to Dr.
4 Rossmo, don't make things more complicated than
5 they appear. If there's a simple explanation,
6 look at it first.

7 In my submission, Mr. Ward's theories of a
8 cover-up or a whitewash that has been perpetrated
9 by multiple police and government institutions
10 with the assistance of numerous individuals,
11 including many upstanding members of the bar,
12 officers of the court, is exactly what Occam's
13 razor warns against. It's a complex explanation
14 which, in my submission, has no foundation in fact
15 and no evidence that has been put forth to support
16 it. The explanation that you should accept, in my
17 submission, Mr. Commissioner, is the simplest one,
18 and the simplest one is the one supported by the
19 evidence as taken -- as you have been taken
20 through by my learned colleague Ms. Tobias, and
21 that is that the Government of Canada has taken
22 great efforts to cooperate with this commission to
23 produce the documents that are relevant to assist
24 you in fulfilling your mandate. Where documents
25 haven't been produced the simplest explanation is

1 found in either good reason, the passage of time,
2 in the loss of documents or the vast amount of
3 documents that have been collected with respect to
4 these investigations.

5 So in conclusion, our submission is that
6 there is no need to make an order for disclosure
7 of the documents requested by Mr. Ward, and I say
8 this for two reasons. The first, and this reason
9 was mentioned in respect of summonses by my
10 learned colleague Ms. Tobias, but it's the
11 constitutional principle of inter-jurisdictional
12 immunity, and that is that the commission just
13 wouldn't have the authority to issue a summons to
14 a federal institution of the RCMP. It also
15 wouldn't have jurisdiction to compel production.
16 Now, similar just as if there would be no
17 jurisdiction to compel production from say the
18 Peel Police. But you shouldn't be concerned with
19 that limit on your -- with that limit provided by
20 the constitution on your authority to compel, and
21 I say this for two reasons. First, the specific
22 requests, as I have taken you through, made by Mr.
23 Ward and Mr. Chantler have been addressed save for
24 the exception of Ms. Galliford's allegations,
25 which are the subject of an ongoing investigation

1 and can be dealt with if and when she is called as
2 a witness. And the second is that the RCMP is on
3 the record as having fully committed to assisting
4 this commission on fulfilling its mandate.

5 I'll take you back just briefly to -- and I
6 won't take you there, but on behalf of the
7 Government of Canada during the opening statements
8 of this commission my colleague Ms. Tobias
9 commented on the critical importance of this
10 inquiry and the Government of Canada's keen
11 interest in obtaining answers to the questions
12 about what happened in the past and in assisting
13 the commissioner, yourself, with making helpful
14 recommendations for the future. Ms. Tobias also
15 expressed the Government of Canada and RCMP's full
16 support of this commission of inquiry, and that
17 full support and cooperation continues to this
18 day. And I would also note that on January the
19 27th, 2012, the RCMP's commanding officer in
20 British Columbia reaffirmed Deputy Commissioner
21 Bass's statement of regret that was delivered in
22 August 2010 and also apologized on behalf of the
23 RCMP to the families of the victims that the RCMP
24 did not do more to prevent the tragic losses of
25 life.

1 Clearly the RCMP has an interest and is
2 committed to being fully transparent in this
3 process. I submit that these words of commitment
4 and transparency, cooperation, openness are
5 supported by the submissions made by my learned
6 colleague Ms. Tobias and the affidavit of Sarah
7 Armstrong #1, which details fully the steps and
8 the dedication that has been taken with respect to
9 disclosure and cooperation with this commission.
10 And in these circumstances there is no need, in my
11 submission, for the commission to make a formal
12 production order, and that being said, we will, of
13 course, await commission counsel's decisions
14 pursuant to the rules of this commission and will
15 cooperate with whatever requests are made --

16 THE COMMISSIONER: All right.

17 MR. MAJAWA: -- as we have in the past.

18 THE COMMISSIONER: Thank you.

19 MR. MAJAWA: Those are my submissions.

20 THE COMMISSIONER: Mr. Peck, do you have any?

21 MR. PECK: No, sir. Thank you.

22 THE COMMISSIONER: All right. Mr. Hira?

23 MR. HIRA: No, thank you, sir.

24 THE COMMISSIONER: Okay. Who else?

25 MR. CHANTLER: Mr. Commissioner, if no one else has any

1 comments, I do have a few points to make.

2 THE COMMISSIONER: No, I expect you'll have a reply, and I'll
3 give you the opportunity to reply.

4 MR. SKWAROK: Mark Skwarok for Dr. Rossmo. In my submission,
5 there already has been sufficient documentary
6 disclosure to prove Dr. Rossmo's thesis on what
7 went wrong. His primary position is that the
8 police management failed to recognize in a timely
9 way that this was a serial murder case probably
10 and not simply a missing women's one. The
11 documents in evidence tendered to date, in my
12 respectful submission, are more than adequate to
13 demonstrate that. His second thesis on what went
14 wrong is that there was inadequate collaboration
15 between the Vancouver Police Department and the
16 RCMP. Again, in my submission, the disclosure to
17 date has been sufficient. There's no requirement
18 or need for any further order to advance Dr.
19 Rossmo's thesis on what went wrong.

20 THE COMMISSIONER: All right. Thank you, Mr. Skwarok.

21 MR. VERTLIEB: I'm just wondering if Mr. Chantler should reply.
22 I do have some thoughts I want to --

23 THE COMMISSIONER: Okay.

24 MR. VERTLIEB: -- share. I'm totally in your hands, but maybe
25 Mr. Chantler should reply and then --

1 THE COMMISSIONER: Well, Mr. Dickson wants to reply, obviously,
2 as well, because he's a respondent here on this
3 application, so who wants to go first here?

4 MR. DICKSON: Commissioner, Tim Dickson for the VPD. If I
5 could just add a few comments on something that
6 arose yesterday during Ms. Tobias's submissions.
7 With your indulgence, I'd just like to address one
8 point.

9 THE COMMISSIONER: Why don't I hear you now, and then I'll give
10 you the final word, Mr. Chantler.

11 MR. CHANTLER: Mr. Commissioner, I would certainly like to go
12 last since this is our application.

13 THE COMMISSIONER: Yeah. No, I --

14 MR. CHANTLER: I can't imagine why I wouldn't go last.

15 MR. DICKSON: I think that makes sense, Mr. Commissioner. If
16 you recall yesterday when Ms. Tobias began her
17 submissions, she referred to Mr. Ward's blog, and
18 Mr. Chantler objected, and he said something to
19 the effect that he didn't see that Mr. Ward's blog
20 and his statements in the media were relevant and,
21 in any event, he wasn't here to defend himself and
22 so they shouldn't be referred to, and I just want
23 to quickly state why I think those statements in
24 the blog and in the media are indeed entirely
25 relevant on this application, and I am going to

1 suggest that the context of this application
2 should not be lost. If you recall, Mr. Ward made
3 some statements in that *National Post* article on
4 Saturday, February the 4th, and he referred to
5 a -- he alleged a police cover-up and he alleged
6 that the commission is enabling it.

7 MR. CHANTLER: Excuse me, Mr. Commissioner.

8 THE COMMISSIONER: Yes.

9 MR. CHANTLER: My friend has asserted that Mr. Ward made
10 statements. You are well aware the media
11 frequently misreports things that are said in this
12 room.

13 THE COMMISSIONER: Yes. Let's calm down here. I think those
14 are probably statements that are attributable to
15 him. Maybe that's a fair way of putting it. All
16 right. Yes.

17 MR. DICKSON: Indeed they are, Mr. Commissioner. The article
18 is written as quoting Mr. Ward, and if Mr. Ward
19 wishes to withdraw those statements, I welcome
20 that, I ask him to, and that indeed is the context
21 of this application. On Monday, February 6th --
22 sorry. So I should say in that article there's
23 the allegation of a police cover-up, there's the
24 allegation that this commission is enabling a
25 police cover-up, and those allegations seem to be

1 tied to the suppression, alleged suppression of
2 documents. You raised that article last Monday,
3 February 6th, and that was, in my respectful view,
4 entirely right for you to do so because Mr. Ward
5 was impugning the integrity of this commission.
6 When you raised that, Mr. Ward stood up in this
7 hearing room and he repeated those allegations,
8 and I stood up and I said there was no foundation
9 whatsoever to those, and I -- and I stated that
10 Mr. Ward should not be making those statements
11 just to the media, but he should bring his
12 allegations here, he should particularize his
13 allegations so that we could respond and you could
14 decide. And that was the statement, bring your
15 application, and Mr. Ward said he would deliver
16 his application that day or the next day. He, in
17 fact, delivered his application on Friday. And
18 that day, on that Friday, Mr. Ward wrote another
19 blog entry, and it was published to the whole
20 world on his website. And I won't read much from
21 it.

22 MR. CHANTLER: Before we get into the content of the blog
23 entry, Mr. Commissioner, can you please ask my
24 friend to clarify, and he was going to get to this
25 point but he hasn't, what the relevance of

1 anything Mr. Ward has ever said on a blog entry
2 has to do with my application for document
3 production at this application.

4 THE COMMISSIONER: All right. Well, you know, it's generally
5 been tied together, that is, a failure -- as I
6 understand Mr. Ward's position and your position,
7 and you can correct me if I'm wrong, that the
8 failure to produce documents by the police is a
9 cover-up, and that's what Mr. Ward suggested when
10 I asked him that after that article appeared, and
11 he reiterated that here. He didn't quite say --
12 and I just -- I want to give everybody an
13 opportunity to be heard on it because the
14 allegations are serious because the -- they do
15 reflect the integrity of this inquiry, and I am
16 troubled, as I said before to Mr. Ward, about the
17 allegations that -- that this commission -- I know
18 the allegations are made against the police, but
19 nevertheless he goes on to say that the inquiry is
20 enabling a cover-up, and I am troubled by that,
21 and he repeated it here, so --

22 MR. CHANTLER: Mr. Commissioner.

23 THE COMMISSIONER: Wait a minute. Don't interrupt me. I
24 didn't interrupt you. So I think because these --
25 the allegations that are made outside the

1 courtroom and inside the courtroom are
2 inextricably tied I am going to let Mr. Dickson
3 finish, and I'll give you full opportunity to
4 reply to it.

5 MR. CHANTLER: Thank you.

6 THE COMMISSIONER: Okay. Thank you.

7 MR. DICKSON: Thank you, Mr. Commissioner. Yes, we definitely
8 do regard these statements as very serious. So as
9 I was saying, on February 10th Mr. Ward wrote on
10 his blog another entry, and he discussed first,
11 you know, police making -- sometimes making
12 mistakes and all of us are human and mistakes made
13 in good faith can always be forgiven, and then he
14 states this:

15 What I find unforgivable are those cases
16 where police use the taxpayers' money to
17 investigate their own mistakes and try to
18 minimize them by manipulating public opinion
19 in their favour,

20 which in my view seems to be some oblique
21 reference to the LePard report. He goes on:

22 It certainly doesn't happen all the time, but
23 it has occurred in so many serious cases I
24 have handled that I get frustrated and
25 discouraged when I see the police use my tax

1 dollars to engage in the same predictable
2 ham-handed cover-ups and whitewashes.
3 And then he discusses three different cases that
4 he says are examples of those, and then he says
5 this:

6 So do police cover up and whitewash their
7 mistakes in serious cases? In my opinion,
8 absolutely. Does the criminal justice system
9 work in those cases? Absolutely not. Have
10 the police covered up or whitewashed their
11 actions in the missing women investigations?

12 At this point it sure looks like it to me.
13 So that's what -- that's what he's saying. It
14 sure looks like it, sure looks like the police
15 have covered up or whitewashed their actions in
16 the missing women investigations.

17 So if I can take you into, Mr. Commissioner,
18 into the Whitehead affidavit. That's Mr.
19 Chantler's affidavit. And I won't be too much
20 longer.

21 THE COMMISSIONER: All right.

22 MR. DICKSON: But tab 45, if you could have a look there, Mr.
23 Commissioner.

24 THE COMMISSIONER: Yes. Go ahead.

25 MR. DICKSON: Yes. So you'll see here that this is an e-mail

1 from me to Mr. Chantler. This is after having
2 received the amended notice of application. It's
3 on Friday, February 10th in the morning. And I
4 say:

5 Thank you for your amended notice of
6 application. You say that you will be
7 relying on an as-yet-unsworn affidavit from
8 Robin Whitehead. When can we expect to
9 receive a copy?

10 We received that Saturday night. And then over
11 the page I also make this comment, and I say:

12 You have made, both in the media and in the
13 hearing room, very serious allegations of a
14 "police cover-up" relating to alleged
15 suppression of documents. It is incumbent
16 upon you to state, with specificity, the
17 basis of your allegations so that we can
18 respond and the Commissioner can rule on the
19 matter. Paragraph 1(a) of your application,
20 however, captures every kind of document in
21 our possession, and obviously we have
22 disclosed a huge number of these. That
23 paragraph does not give any indication
24 whatsoever of what documents you say have not
25 been disclosed. If the documents you say we

1 have not disclosed are only those set out in,
2 the other paragraphs, the more specific
3 paragraphs,

4 then we will address those documents on
5 Monday, but if your application is broader
6 than that...then it is incumbent upon you to
7 advise us immediately as to what those
8 documents are.

9 Because these allegations are very serious. They
10 can't just make these broad, sweeping allegations,
11 put them out there in the media, repeat them in
12 this hearing room and not enable us to respond.

13 And if we go over to the next tab, this is
14 just the last tab, Mr. Commissioner, Mr. Chantler
15 replied, and you'll see "Dear Mr. Dickson" and
16 then he goes on. Over the page he lists 1 through
17 10 categories of documents, and Mr. Hern spoke to
18 those yesterday. He took you to this e-mail. He
19 answered every single one of these. And those are
20 the documents plus the more specific categories
21 that Mr. Hern also addressed from the amended
22 notice of application that appears to be the whole
23 basis of this cover-up and whitewash allegation.
24 And so I just ask that that context be kept in
25 mind because this documents application appeared

1 to us -- we believed that this was going to be the
2 cover-up application, this is when they were going
3 to particularize these very serious allegations
4 that they have made about us and about the
5 commission. We have no problem whatsoever with
6 them seeking documents. That's completely
7 appropriate, normal, and we can have that
8 discussion and we have that discussion on an
9 ongoing basis with commission counsel. But we do
10 take real exception at this totally
11 unsubstantiated language of a cover-up, and
12 there's absolutely no foundation for that -- for
13 that allegation, and it's damaging to this process
14 for such allegations to be made.

15 I don't know why Mr. Ward isn't here. He may
16 have a personal reason. I don't know. But if he
17 doesn't have a personal reason, I say he should
18 have been here. He should have been here to speak
19 to these comments. We asked him to bring his
20 application. We asked for his application to be
21 brought so that we could answer these allegations,
22 so that we could respond, so that you could
23 determine, so we could move on, dispel the pall
24 cast by those allegations. In my respectful
25 submission, there's clearly nothing, nothing

1 underpinning them.

2 THE COMMISSIONER: Okay.

3 MR. DICKSON: And I ask that that be made clear.

4 THE COMMISSIONER: All right. Thank you.

5 MR. CHANTLER: I'd be pleased to have an opportunity to
6 respond.

7 THE COMMISSIONER: Yes.

8 MR. CHANTLER: Unless commission counsel would like to say a
9 few words before.

10 THE COMMISSIONER: All right.

11 MR. VERTLIEB: Well, I certainly have a few comments to make,
12 but I'm happy if Mr. Chantler speaks now.
13 Whatever you prefer.

14 MR. CHANTLER: If I may reserve a right to reply specifically
15 to Mr. Vertlieb's comments, I should reply now to
16 what my friend Mr. Dickson had to say.

17 MR. VERTLIEB: Well, let me just go ahead. Mr. Commissioner,
18 there's a letter from Darrell Roberts, and he
19 can't be here, but he's asked me to make sure that
20 you have it.

21 THE COMMISSIONER: Is it a lengthy letter? Why don't you read
22 it into the record.

23 MR. VERTLIEB: It's not lengthy. This is from Darrell Roberts
24 dated February 9.

25 Verbal notice has been given by Mr. Cameron

1 Ward of an application for further documents
2 and has been scheduled by the Commission to
3 be heard next Monday at 9:30 a.m. While we
4 do not have the application itself, it is
5 unlikely to differ very much from the Notice
6 of Application by Mr. Ward dated October 28,
7 2011 that was subsequently adjourned or not
8 proceeded with.

9 On behalf of our client, Marion Bryce, mother
10 of Patricia Johnson who went missing from the
11 Downtown Eastside in January 2001 and was
12 murdered by Robert Pickton, we do not support
13 the application.

14 There has been extensive document disclosure
15 provided by both police forces and by related
16 boards and government offices, all of which
17 has been submitted to this inquiry. We have
18 also received extensive oral evidence from a
19 number of witnesses with oral evidence from a
20 number of additional witnesses still to come.
21 In addition the Inquiry has received the
22 independent report of Deputy Chief Jennifer
23 Evans commissioned by the Inquiry and written
24 after extensive document review and
25 interviews of nearly all of the involved

1 police officers from both police forces.

2 It is our position that this body of evidence
3 both received and to be received will amply
4 provide the necessary basis for the fact
5 finding task of this Inquiry and for the
6 Commissioner's recommendations.

7 In our view this demand for further document
8 disclosure is unnecessary. There is no
9 evidence that material documents have been
10 withheld or of a cover-up as alleged last
11 Monday or that what is sought is anything
12 more than correspondence or other
13 documentation of little or no relevance to
14 the work of this Inquiry. Further, this
15 application clearly risks the Commission of
16 Inquiry failing to meet the scheduled date
17 for its conclusion and report.

18 This letter has been reviewed by Irwin
19 Nathanson, QC, lead counsel for Marion Bryce,
20 and he has authorized the writer to sign it
21 on his behalf as well.

22 And I just mention that Mr. Roberts wanted to
23 be here. As you may remember, Marion Bryce, who
24 was a very pleasant person, came before you and
25 spoke of her daughter, Patricia Johnson, and the

1 impact of the death of her daughter, and so Mr.
2 Roberts wanted you to have his opinion and that of
3 Mr. Nathanson.

4 THE COMMISSIONER: All right.

5 MR. VERTLIEB: Now, there has been discussion this morning by
6 counsel for the Department of Justice about the
7 cooperation and the way the commission's worked,
8 and I just wouldn't want everyone to think that
9 it's been a simple process and that it's just been
10 without its own issues. We don't often share with
11 our colleagues all of the, as it were, the trials
12 and tribulations, because this has been a
13 challenging endeavour to say the least, but I
14 wouldn't want you, Mr. Commissioner, because we
15 don't share this with you either, you have other
16 important things to do, but I wanted you to hear
17 some of the dialogue that took place with the
18 Department of Justice just to give you a flavour
19 for it because I wouldn't want people to think it
20 was simply a matter of us just writing in and we'd
21 get the material back, although I must say over
22 the last number of months we've had a good working
23 relationship.

24 There was also a comment about the commission
25 staff being laissez-faire about document

1 disclosure, and I think there's many people in the
2 commission who've worked long and hard, and Judy
3 Thompson in particular, who's been a full-time
4 document manager, would take exception to that
5 categorization. So I want to just deal with it as
6 well for that reason out of respect for the staff
7 that have worked tirelessly for many months.

8 The first letter was October 21, and it went
9 to Rebecca Hunter, who was a lead lawyer at DOJ.
10 This is before Ms. Tobias was appointed. And it
11 was my letter to Ms. Hunter, who's a very fine
12 lawyer, senior lawyer, October 21, 2010.

13 Further to our several discussions and my
14 meeting with Deputy Commissioner Gary Bass, I
15 look forward to receiving your position on
16 the release of the RCMP report regarding your
17 investigation into the missing women. As you
18 are aware, time is of the essence.

19 Therefore, could you please provide the
20 commission with your response as soon as
21 possible.

22 Now, just to tell you the backdrop, as soon
23 as we were appointed Ms. Brooks and I went to meet
24 both Police Chief Chu and Deputy LePard. We also
25 went to see Mr. Bass and Mr. Macintyre, who was

1 still in that position, along with Mr. Callens,
2 who is now the boss of "E" Division, and we wanted
3 to introduce ourselves and talk to them about the
4 need to get document disclosure. So that was the
5 first letter. Then Ms. Tobias became involved,
6 and I wrote to her November 24. I thought this
7 was just one sentence of interest.

8 We refer to the many redactions in the RCMP
9 material that you've provided us. Can you
10 please explain the legal basis for these
11 redactions?

12 The only reason I read that to you is it wasn't as
13 though we just would get material and not question
14 it. The staff of your commission would read and
15 question and go back to the providers and say why
16 would that not be disclosed. You've heard some
17 counsel here complain about redactions. We had
18 our own concerns through the process.

19 And then on December 15 another letter from
20 me to Ms. Tobias.

21 Dear Ms. Tobias

22 Thank you for coming to our office with your
23 colleagues to discuss disclosure on December
24 14. I appreciate that you're working your
25 way through documents. One document that

1 should be able to be produced very quickly is
2 the Report to Crown Counsel regarding --
3 relating to the Pickton murder charges. That
4 document would be many years old and would
5 not likely have the names of other potential
6 suspects. I appreciate there could be
7 informants in that material, but that should
8 be easily edited out. You've expressed
9 concerns about the documents going out to the
10 "public", but I'd like to remind you that all
11 participants as well as their clients will be
12 signing confidentiality agreements prior to
13 receiving any of the documents. It is
14 disappointing that we cannot get a date from
15 you as to when you will be able to provide
16 disclosure of the documents relating to
17 Project Evenhanded. However, I cannot see
18 any reason why the Report to Crown Counsel,
19 which is an old document and one that would
20 be readily readable by lawyers, cannot be
21 produced at this time. Out of respect for
22 the holiday season can you please get me that
23 document no later than January 10.

24 So you can get the flavour of this. It's myself
25 writing and saying all of us as lawyers have seen

1 reports to Crown. It's for the Pickton murder
2 trial. Surely we can get that. That's old
3 business. The Department of Justice had a
4 legitimate concern about the public seeing
5 documents, and we respected that, but that didn't
6 mean we couldn't have had that document on a
7 timely basis, and that was written by me.

8 Then I wrote this letter January 25 to Ms.
9 Tobias re disclosure of documents to the
10 commission.

11 The word "disappointment" would be the
12 mildest I could use when I saw the disclosure
13 of relevant documents in the *Globe and Mail*
14 last weekend. Failure to produce relevant
15 documents that could in no way be subject to
16 any "vetting" issues does not enhance
17 confidence in your client's stated desire to
18 provide full disclosure.

19 Now, I just read that to you. At the end of the
20 day we've had very good cooperation from the
21 Department of Justice and the Vancouver Police,
22 but it was not always smooth and simple, and so
23 the comment about being laissez-faire I think is
24 misplaced, and I want you to understand that when
25 my colleagues from the DOJ speak about all the

1 commission needs to do is ask and we provide it,
2 that's the way things are working now, but it took
3 some time to get there, and that's why I want you
4 to see that letter of January 25, because
5 disappointment would be the mildest word I could
6 have used at that time. We were seeing disclosure
7 in the newspapers of documents that we hadn't been
8 given, and that didn't seem right. Anyway,
9 fortunately we got through it.

10 So there are other correspondence items that
11 track through the following months. You've heard
12 about Ms. Evans and her concerns, and she had some
13 frustrations of her own, which she expressed
14 candidly to you. But I do want to say one thing
15 about Ms. Evans. Nowhere did anyone challenge her
16 opinion because she didn't have every document,
17 and nowhere was she asked if her opinion that she
18 gave was a qualified opinion because she didn't
19 know all the documents. In other words, she gave
20 her opinion, and it was clear, and so even though
21 there were issues about disclosure to her as well,
22 it didn't affect the quality of her opinion, and I
23 think that's the important point to take away from
24 the concerns around the document frustration that
25 Ms. Evans expressed.

1 On that same subject, I just wanted to tell
2 you that we had also written to Vancouver Police
3 Department in the same way we originally wrote to
4 DOJ, and I also wrote on October 21 to Mr. Doust,
5 who was acting for Criminal Justice, and we asked
6 him for a report to Crown and followed up. There
7 are a number of letters.

8 So it hasn't just been simple. It's taken
9 time. Your staff has done an extremely diligent
10 job of following up all these requests. There are
11 just a massive amount of requests. And that's why
12 I also wanted to say I heard a comment yesterday
13 that since the commission started 20 per cent of
14 documents have been uploaded. Well, I should hope
15 so. Of course there will be more documents being
16 disclosed even after we've started. That's the
17 normal way commissions of inquiry work, and it
18 happened in Braidwood, and it happened in Cohen.
19 It's happened here. It happens because witnesses
20 will be in the stand and someone says, "Can you
21 please go get that information," and we do. It
22 happens because of the sheer volume of
23 information. So the comment that 20 per cent of
24 documents have been put on Concordance since we
25 started in my suggestion to you is really of no --

1 it's of no value to you in making a decision on
2 the merits of the motion. There is still document
3 disclosure coming in. It's not nearly as
4 voluminous as it was, but there are still
5 documents that do come in.

6 One other thing I wanted to say is we, Ms.
7 Brooks and I, were concerned when Biddlecombe's
8 memo came out. It was an unseen document that Mr.
9 Neave put to the witness. We hadn't seen that,
10 and so we immediately sent out summonses to all
11 the individual police officers that were -- that
12 we thought might have documents that hadn't been
13 produced for whatever reason. I'm not suggesting
14 it was some bad reason at all, particularly with
15 Mr. Neave not here, but we've even on that basis
16 sent out and stayed on top of document requests.

17 Now, I wanted to also just clarify this
18 jurisdictional issue because I'm not sure it was
19 clearly put by the Department of Justice, and I
20 think that Mr. Chantler, who wasn't party to
21 Braidwood, he just wouldn't know all the
22 circumstances. The jurisdictional issue is a
23 clear one, and it's nothing confusing or magical.
24 You are a provincial inquiry commissioner, and
25 you, therefore, cannot deal with the policies and

1 management issues around the RCMP. Mr. Brongers
2 and I dealt together in Braidwood, and in
3 Braidwood he would never accept a summons for
4 documents. They would not attorn to the
5 jurisdiction in that formal way, but they agreed
6 they would give documents as requested. Mr.
7 Brongers and I had the same discussion on your
8 commission with the same position being taken.
9 The Government of Canada and the RCMP would not
10 accept the summons, and if we served one, they
11 would move to set it aside on jurisdictional
12 issues. It seemed to me that it didn't make sense
13 for us to become involved in a court application
14 on a jurisdictional issue that would do two
15 things: it would take time, and it would deflect
16 from the need to get documents. And so we
17 maintained the same approach here in this
18 commission that you are running as we did in
19 Braidwood; namely, we won't serve a formal
20 summons. We'll just get the documents, and we'll
21 deal with it. That position has been communicated
22 to Mr. Ward because he fairly asked if we were
23 going to serve a summons on the RCMP, and we gave
24 him that information. We have served summons on
25 Vancouver Police because they are within your

1 jurisdiction, and the Criminal Justice, they're
2 within your jurisdiction. So I just wanted you to
3 be clear on the jurisdictional issue. It's not
4 complicated. It's not magic. It's a very clear
5 principle of law that's well recognized. But it
6 has not been in the way that -- that
7 jurisdictional issue has not been an impediment.

8 Now, I wanted to address one point for your
9 information. There was some confusion perhaps
10 about the Crown destruction. And Mr. Doust is not
11 here to deal with it, but you know that there was
12 a Crown policy manual dealing with it, and there
13 was one page, and, Mr. Chantler, maybe you can
14 help the commissioner with the tab number of the
15 one page that showed the destruction.

16 MR. CHANTLER: Mr. Commissioner, just give me a moment. Tab
17 68, Exhibit 68 of the Whitehead affidavit.

18 THE COMMISSIONER: 68.

19 MR. VERTLIEB: Mr. Commissioner, turn to 68, please, tab 68.

20 Do you have that document?

21 THE COMMISSIONER: Yes.

22 MR. VERTLIEB: Now, do you have another document attached to
23 it?

24 THE COMMISSIONER: No.

25 MR. VERTLIEB: Okay. Well, we do.

1 THE COMMISSIONER: There's one page here.

2 MR. VERTLIEB: All right. That's unfortunate. So what you
3 have is CJB -- look at the top right corner.
4 These are numbers that we've now come to recognize
5 because this is our tracking system. So this
6 document CJB-003-000003 -- now, I trust everybody
7 in the room has that document. The next page,
8 which was page 4, has the list of all the files
9 that were destroyed, and Pickton's name is right
10 there, and it's got the number 52808. It says
11 "Pickton, Robert", and it says "attempt murder".
12 So I didn't want you to have confusion. It seemed
13 to me that no one was telling you yesterday that
14 there was documentary evidence to show that the
15 Pickton file appears to have been destroyed, as
16 Mr. Doust was saying. Now, Mr. Doust came here --
17 he came here, as it were, just to assist, but
18 that's material that everybody's seen.

19 THE COMMISSIONER: So that wasn't in Mr. Chantler's material?

20 MR. VERTLIEB: Well, I didn't find it. I wasn't sure. That's
21 why I was asking. Maybe I missed it.

22 THE COMMISSIONER: Okay. Okay. You'll get --

23 MR. CHANTLER: I will have some comments to make about it.

24 THE COMMISSIONER: You don't need to jump up. I mean, you're
25 going to get a full opportunity to reply here.

1 MR. CHANTLER: I just didn't want there to be any
2 misunderstanding.

3 MR. VERTLIEB: Well, I don't know what the mis -- anyway, I
4 just wanted you to see it. When I saw it, it
5 seemed to me and it seemed to Ms. Brooks that it
6 looks like the Pickton file had indeed been
7 destroyed the way the document in the preceding
8 page suggested it had. Now, maybe I'm missing
9 something, but I wanted you to see it.

10 THE COMMISSIONER: All right.

11 MR. VERTLIEB: It's unfortunate it was destroyed, and there's a
12 valid question about why would it be destroyed if
13 Pickton's known to police as a suspect, but that's
14 a different issue for you in terms of
15 communication. So I just wanted -- it wasn't
16 clear to me yesterday. Maybe I'm the only one
17 that was confused.

18 Now, finally, I just want to address very
19 briefly because I don't want to have you engage in
20 a discussion now on this issue around cover-up.
21 First, I don't think my learned friend Mr.
22 Chantler, who's a young member of the bar, should
23 be called in any way to answer for comments made
24 by a senior member of the bar. That doesn't seem
25 to me to be the way it should unfold. So I'd like

1 there to be no further discussion on that out of
2 respect for Mr. Chantler. It's just not fair.

3 THE COMMISSIONER: I agree with you.

4 MR. VERTLIEB: Thank you.

5 THE COMMISSIONER: And I don't want this commission to be
6 derailed by -- by comments made out of this room.
7 We have more important things to do, and we have
8 to get at them.

9 MR. VERTLIEB: I agree, but at some point I as your counsel
10 feel there could be a need to have that addressed
11 so as to put it to bed once and for all.

12 THE COMMISSIONER: All right.

13 MR. VERTLIEB: But now is not the time, and, in my view, it
14 doesn't impact on your document motion, so I think
15 we can just leave that alone for the time being,
16 but I don't think it should be ignored because of
17 some of the comments others have made about it,
18 including Mr. Roberts last Monday, who's a senior
19 member of our profession, and you'll recall his
20 reaction in his comments to you.

21 So I just wanted to make those comments to
22 you to assist you and others and to help people
23 understand a bit more of the flavour of this
24 document process. I guess at the end of the day
25 if the DOJ were having trouble with us and were

1 having some issues and Mr. Ward's having some
2 issues, maybe at the end of the day we're doing it
3 right if both sides seem to be upset about
4 document disclosure in some way. But I think the
5 most important point of it all is of the hundreds
6 of -- there's so many thousands of pages of
7 material that what at the end of the day really
8 matters, and this is totally your decision, is for
9 you to decide what information you need to know to
10 help you fulfil the mandate as you've defined it,
11 and that's why as you reflect on this motion over
12 the next number of days it's really all about what
13 it is you need to do the job that you've
14 undertaken.

15 THE COMMISSIONER: All right. Thank you. I think we'll take
16 the morning break.

17 THE REGISTRAR: The hearing will now adjourn for 15 minutes.

18 **(PROCEEDINGS ADJOURNED AT 11:12 A.M.)**

19 **(PROCEEDINGS RESUMED AT 11:30 A.M.)**

20 THE REGISTRAR: Order. The hearing is now resumed.

21 THE COMMISSIONER: Mr. Gratl.

22 MS. GRATL: Mr. Commissioner, Jason Gratl for Downtown Eastside
23 interests. I just have a few comments in reply.

24 THE COMMISSIONER: Yes.

25 MR. GRATL: The first is just a note that sometimes these

1 disclosure applications do shake some documents
2 out of the trees, and we've seen that already.
3 We've had disclosure of new, not smoking guns, but
4 maybe steaming a little bit from the Department of
5 Justice. We have promises of more from the
6 Criminal Justice Branch, and we have assertions of
7 willingness to provide further documents from the
8 Vancouver Police Department. Overall, it appears
9 as though this exercise has been worthwhile.
10 That's my first comment.

11 The second is to bring your attention, Mr.
12 Commissioner, to what appears to me to be a bit of
13 a structural problem. Many of the documents
14 appended as exhibits to the affidavits filed by
15 the Government of Canada on this application have
16 never been copied to me. So, for example, when
17 the Department of Justice wrote to your counsel to
18 advise that privilege was waived on certain
19 documents, presumably new versions of those
20 documents with the redactions removed were
21 uploaded to Concordance. I never received notice
22 of that either in the form of being copied on the
23 correspondence from the Department of Justice to
24 your counsel, nor from commission counsel in the
25 form of a notification that new documents were

1 being uploaded for Concordance, and so I'm asking
2 to remedy that structural problem, that all
3 participants be provided copies of --

4 THE COMMISSIONER: Have you spoken to commission counsel?

5 MS. GRATL: No, because it only now came to my attention that
6 there's been voluminous correspondence, but I
7 thought it would be good to bring that to your
8 attention, Mr. Commissioner.

9 THE COMMISSIONER: Okay. All right.

10 MR. GRATL: And so I'm asking in the future that all
11 participants be copied on all disclosure
12 correspondence.

13 THE COMMISSIONER: All right.

14 MR. GRATL: And, moreover, that participants be notified on a
15 real-time basis when documents are uploaded to
16 Concordance. So, for example, the documents
17 uploaded to Concordance on Friday, the steaming
18 gun documents that I spoke about and some of which
19 are appended to the affidavit filed by Mr. Ward's
20 office, I hadn't seen those. I had no idea that
21 they had been uploaded. I didn't receive any
22 notice of that upload. And those are important
23 documents. I wouldn't even know to go to look for
24 them. They would be, for my purposes, lost.

25 THE COMMISSIONER: Okay.

1 MR. GRATL: And then, lastly, a couple of principles that in my
2 respectful submission apply to this application.
3 In addition to the standard of relevance of
4 being -- of documents being useful to you in your
5 work, there are two other principles at play, in
6 my submission. The first is that this inquiry is
7 dependent on public perception to accomplish its
8 goals and for the meaning and relevance of its
9 findings of fact and recommendations. That is one
10 overriding principle that ought to be kept in
11 account. The second is, and I won't go into
12 detail here in respect of all the facts and so
13 forth, but I would say that one of the principles
14 at play is that counsel, especially advocate
15 counsel, like Mr. Ward, require and are entitled
16 to a certain latitude in terms of freedom of
17 expression in order to accomplish the public
18 interests they are intended to serve. That's an
19 overriding principle that is also of significant
20 importance --

21 THE COMMISSIONER: All right.

22 MR. GRATL: -- on this application. Those are my submissions.

23 THE COMMISSIONER: Thank you, Mr. Gratl. Thank you. Mr.
24 Chantler, how long are you going to be?

25 MR. CHANTLER: Thank you, Mr. Commissioner. Perhaps half an

1 hour at the longest.

2 THE COMMISSIONER: All right. Okay.

3 MR. CHANTLER: I have about six points to make.

4 THE COMMISSIONER: Yes.

5 MR. CHANTLER: And I will be as brief as I can and as focused
6 as I can on replying to the comments made by my
7 learned friends before me.

8 THE COMMISSIONER: All right.

9 MR. CHANTLER: Both of my friends from the Vancouver Police
10 Department and the Department of Justice have told
11 you that a general production order would be
12 unnecessary, among other reasons why they suggest
13 this order shouldn't be made, and this is my first
14 point. In the case of the Vancouver Police
15 Department the argument is founded primarily on
16 the fact that a summons has already been issued to
17 them and, therefore, a general production order
18 would be redundant. I think for these purposes
19 it's important that we turn to the summons. It's
20 at Exhibit 19 of the affidavit of -- the Whitehead
21 affidavit, excuse me, and just have a look at what
22 it says. It's a couple of pages from the start of
23 the tab. I'm referring specifically to the
24 summons that was issued to Chief Constable Jim Chu
25 of the Vancouver Police Department. The first

1 comment I have to make about this summons is that
2 it was issued on August 18th, 2011, less than two
3 months before the start of these hearings. This
4 summons was issued I think in response to demands
5 that Mr. Ward and I made of the commission to do
6 such a thing, and it certainly was, at the least,
7 an afterthought. That's a primary problem with
8 it. The second problem with it is it refers or
9 requests, rather, a date range of January 23rd,
10 1997, to February 5th, the time period defined by
11 the terms of reference, and asks the police
12 department to produce documents created within
13 that time period related to the missing women
14 investigations. We know that documents created
15 outside of that time period are not necessarily
16 those produced in that time period. There are
17 numerous documents that have been disclosed to
18 this commission outside of that time frame. The
19 third problem is it provided a deadline for
20 production of those documents of August 31st,
21 2011, which was an appropriate deadline, but it
22 also provided that -- an alternate, "or by such
23 date arranged with counsel for the commission".
24 Now, we have no idea what agreements, private
25 agreements have been made between the commission

1 and the Vancouver Police Department with respect
2 to production deadlines, but whatever those are,
3 they appear to have been inadequate because
4 documents continue to trickle in almost weekly.

5 What we're asking for is a general order for
6 relevant documents, among the other orders we
7 seek, with a deadline, perhaps, that suits this
8 commission's deadline of hearings of April 30th.

9 THE COMMISSIONER: All right.

10 MR. CHANTLER: With respect to the RCMP, no summons has been
11 issued, but my learned friends at the Department
12 of Justice suggest that they've been cooperative
13 and provided all relevant documents to commission
14 counsel at commission counsel's request. If those
15 comments are true, and I accept that they may be,
16 there's simply no harm done by your order for a
17 general production of relevant documents. There
18 can be no harm done, and there can only be a
19 benefit if, as my friend Mr. Gratl has put it,
20 some documents are shaken out of the trees.

21 As a final point, and it's related to this,
22 it cannot be left to us as counsel for the
23 families in this inquiry to request, to pinpoint
24 and request what's missing. We have done our very
25 best, and it's been a very challenging task, to

1 identify classes of documents that we can say with
2 some certainty have not been disclosed to this
3 commission. That responsibility should not be
4 placed on us in the first place. This is not how
5 our system works. Counsel for a party has an
6 obligation to review its client's records and
7 determine or make determinations of relevance.

8 So I submit these general orders for
9 production are necessary and appropriate in the
10 circumstances, and if the parties have, in fact,
11 complied with the general orders already or the
12 specific orders we've sought, they can simply
13 advise the commission, and we'll all be happy.

14 The second point I want to make is directed
15 to the Vancouver Police Department as well, and
16 that's with respect to the Vancouver Police Native
17 Liaison documents. My friend has conceded that
18 these documents may be relevant.

19 THE COMMISSIONER: Yes.

20 MR. CHANTLER: He's suggested that it's been difficult to find
21 them. As we've learned from counsel, Ms. Gervais,
22 these documents are in the possession or control
23 of Ms. Freda Ens.

24 THE COMMISSIONER: Wasn't that addressed yesterday? I thought
25 she said they're available.

1 MR. CHANTLER: Well, I'm only responding to my friend Mr.
2 Hern's comments.

3 MR. VERTLIEB: And I've asked her to get them.

4 THE COMMISSIONER: Pardon me?

5 MR. VERTLIEB: I've asked Ms. Gervais to get them.

6 THE COMMISSIONER: Yes. All right.

7 MR. CHANTLER: I'm just responding to his comments that it was
8 difficult. They're in the possession or control
9 of Ms. Freda Ens, who headed up that organization
10 through its existence. She would have been the
11 first person anyone would have asked if they'd
12 been seeking those documents, and apparently that
13 was never done. I say this only to give you a
14 sense of the approach that's been taken to
15 document production and disclosure.

16 The third point I wish to make has been
17 touched on by my friend Mr. Gratl. I'll try and
18 be as brief as I can, but it has to do with
19 communications between the commission and the
20 department. I say this because I was concerned
21 about your comments, Mr. Commissioner, yesterday
22 that this application ought not to have been
23 brought if we were in possession of all this
24 information. I think it's clear to you now, based
25 on my friend's comments, that we were completely

1 in the dark with respect to the commission and the
2 Department of Justice's communications with
3 respect to document production. Almost -- with
4 maybe a couple of exceptions, none of the
5 correspondence in these affidavits had been seen
6 by us before yesterday. And I note
7 parenthetically that we ought to have been
8 included in those discussions. As parties to this
9 inquiry we ought to have been included in the
10 agreements that were made with respect to document
11 production, and we were not.

12 THE COMMISSIONER: Well, with respect, you're talking about the
13 redactions?

14 MR. CHANTLER: Not only redactions. There are letters between
15 commission counsel and the Department of Justice
16 with respect to what classes of documents are even
17 relevant to this inquiry.

18 THE COMMISSIONER: But the general procedure is for commission
19 counsel -- that's why we have commission counsel.
20 Commission counsel talks to each respective party
21 who is in possession of documents, and it would be
22 impossible to include all the parties in them, and
23 then -- then they produce the documents, and if
24 you find it's unsatisfactory, then you ask for
25 them, but you simply can't have everybody around a

1 table and decide what's relevant and what's not,
2 because, as I understand it, there was a complex
3 redaction process wherein names of parties who
4 were not involved were included in documents and
5 there were witnesses and ongoing investigations
6 and all of that, and I don't know it would be
7 entirely proper to include all the parties, and
8 particularly if some of the parties aren't
9 represented by counsel.

10 MR. CHANTLER: I accept your comments.

11 THE COMMISSIONER: That's --

12 MR. CHANTLER: I suggest --

13 THE COMMISSIONER: I understand what you're saying.

14 MR. CHANTLER: -- there may be some areas where it would have
15 been helpful to have our input so we didn't have
16 to have these battles after the fact. We're not
17 asking for the Department of Justice to produce 2
18 million documents. We're not suggesting that 2
19 million documents are relevant. We're asking for
20 an order that a more careful approach is taken to
21 reviewing those documents for relevance.

22 My fourth point is with respect to the *Keable*
23 decision. I'll just briefly respond to my learned
24 friend's remarks about that decision. My friend
25 cited this case as authority for the proposition

1 that the commission did not have jurisdiction to
2 issue summons for the production of documents
3 relevant to its fact-finding mission. And I've
4 chosen those words carefully. This is a decision
5 from 1978. The BC Court of Appeal would have been
6 well aware of this decision when it rendered its
7 decision in the *Braidwood* case, which I referred
8 to yesterday. On my quick review of the case it
9 appears it is completely distinguishable. The
10 issue in *Keable* was whether the commissioner had
11 the ability to inquire into, among other things,
12 the rules, policies, and procedures of a federal
13 institution, which we're not doing here, and the
14 commission of allegedly criminal or reprehensible
15 acts, which we're not doing here. The Department
16 of Justice was unsuccessful with this same
17 argument in the *Braidwood* case, where the
18 commissioner -- the commissioner's issuance of
19 notices of misconduct much more closely resembled
20 an exercise in criminal law.

21 MR. HIRA: Mr. Commissioner, the Department of Justice never
22 appeared in the petition or the Court of Appeal
23 application.

24 THE COMMISSIONER: No. All right.

25 MR. CHANTLER: Thank you, Mr. Hira. In any event, the same

1 argument applies. Here all you are required to do
2 is make findings of fact respecting the missing
3 women investigations, a task you cannot properly
4 complete without records in the possession and
5 control of the RCMP.

6 THE COMMISSIONER: All right.

7 MR. CHANTLER: The *Keable* decision is even less applicable in
8 this case than it was in the *Braidwood* case, which
9 the Court of Appeal would have had in its -- in
10 its knowledge.

11 I stand by my submissions that the Court of
12 Appeal's decision in the *Braidwood* case, if it's
13 reviewed carefully, permits this inquiry to issue
14 a summons to the RCMP.

15 THE COMMISSIONER: All right.

16 MR. CHANTLER: I'd like to make a few comments -- this is my
17 fifth point -- about the specific files that my
18 friends have said we have sought orders for and
19 that they're alleging have already been addressed.
20 Quite to the contrary, none of the orders we're
21 seeking have been addressed with respect to our
22 families' missing person files, and we've
23 carefully considered what applications we were
24 going to put forward.

25 Yesterday my friend Ms. Tobias referred you

1 to a force-wide broadcast -- it was referred to
2 today again -- that was delivered apparently to
3 every member and employee of the RCMP, and I'll
4 turn to that just briefly. It's at the Armstrong
5 affidavit, Exhibit "Q" -- Affidavit #1, that is,
6 Exhibit "Q" at page 2 of that exhibit. The
7 request in the force-wide broadcast related to a
8 date range of April 1st, 1996, to December 9th,
9 2007. This is clearly in recognition of the fact
10 that documents created outside of the time period
11 defined by the terms of reference for the purpose
12 of book-ending the missing women investigations, I
13 suggest, in the terms of reference may still be
14 relevant to this inquiry.

15 THE COMMISSIONER: No, I think we've taken that approach here.

16 MR. CHANTLER: I think so.

17 THE COMMISSIONER: And that is that merely because there's a
18 cut-off date in the terms of reference doesn't
19 mean that documents that may have fallen within --
20 outside the strict terms are not admissible.
21 We've taken that approach.

22 MR. CHANTLER: Yes. Now, if we turn to the next affidavit, #2
23 of Sarah Armstrong, the first exhibit, "A", is a
24 letter my friend also referred to. This is a
25 letter from Ms. Tobias to Mr. Boddie of October

1 5th, 2011. I'd like to point out that it's
2 specifically in response to requests raised by our
3 office to the commission in accordance with the
4 procedure that's in place. On the last page of
5 that document, just another tangential point is
6 that Ms. Tobias actually even invited the
7 commission to forward this letter to participants.
8 This letter never was forwarded to us, so we
9 weren't in possession of any of this information
10 at all, at least for some time until perhaps a
11 month and a half later when Mr. Boddie submitted
12 his chart to us.

13 THE COMMISSIONER: Okay.

14 MR. CHANTLER: The final paragraph of that letter under the
15 subheading "All investigative records related to
16 the disappearance and death of Cara Ellis" says,
17 and I'll just read:

18 In our letter to the Commission dated
19 September 6, 2011, we confirmed that the
20 original missing persons report for Cara
21 Ellis would not be disclosed. This is
22 because Cara Ellis was reported missing on
23 October 9, 2002, outside the relevant period
24 set by the Inquiry's Terms of Reference.
25 Now, that's a very unfortunate thing for the

1 Department of Justice to be saying in light of our
2 requests, in light of the potential relevance of
3 the document outside of that narrow time frame,
4 and my friend has alluded to the fact that some
5 Cara Ellis documents have, in fact, been
6 disclosed, and I don't take issue with that. What
7 has been disclosed, if I may continue, are summary
8 documents that refer throughout to source
9 documents that have not been disclosed.

10 THE COMMISSIONER: All right.

11 MR. CHANTLER: And that is what we are seeking in this
12 application.

13 THE COMMISSIONER: Okay.

14 MR. CHANTLER: The same comments apply with respect to the
15 documents related to Elsie Sebastian, although
16 I'll add that what I directed you to yesterday
17 were documents related to the initial
18 investigation for Ms. Sebastian that would have
19 been conducted in the early 1990s that led later
20 on and would have informed the investigation
21 through the terms of reference time period. That
22 is what we are seeking, not the documents that my
23 friend has suggested satisfy that request in its
24 entirety. That is completely untrue.

25 THE COMMISSIONER: Okay.

1 MR. CHANTLER: I'll add that we know quite well what a complete
2 Project Evenhanded missing person file should look
3 like because in some cases such file has been
4 disclosed. The Dianne Rock file is an example of
5 a file that's been produced to us seemingly in its
6 entirety, and so we know what types of documents
7 and the extent of documents that should exist in
8 these files, and it isn't the case with every
9 missing woman.

10 THE COMMISSIONER: All right.

11 MR. CHANTLER: My friend brought to your attention the late
12 disclosure I mentioned in my introduction
13 yesterday of the documents confirming an
14 unidentified man was seen -- perhaps not
15 confirming, but suggesting an unidentified man was
16 seen on the Pickton property in the barn with a
17 knife three months before the farm was finally
18 searched and missing human remains were found in
19 that barn. I had reviewed that document
20 carefully. I was aware there was some issue of
21 that officer recanting his position down the road.
22 We will not know until we get further information
23 or hear from that witness why he would have done
24 such a thing, why he would have recanted his
25 original position that he saw a man in the barn,

1 but my point was only that that is a relevant
2 document that ought to have been disclosed long
3 ago.

4 My final point is with respect to two very
5 recent developments since we broke for the day
6 yesterday. The first is more late disclosure of
7 critical documents by the RCMP. Last night when
8 we arrived back at the office we learned that
9 there had been another batch of disclosure to the
10 Concordance database. After everything that has
11 been said in this courtroom, you can imagine our
12 surprise to receive notes relating to the April
13 9th and May 13th, 1999 meetings.

14 THE COMMISSIONER: Why is that unusual?

15 MR. CHANTLER: Mr. Commissioner, we've been requesting --

16 THE COMMISSIONER: I know that, but the initial evidence that
17 was available was that there were no notes, nobody
18 knew about any notes, and I think it was some
19 investigation on the part of commission counsel on
20 the weekend that found out that -- I don't know
21 who he contacted.

22 MR. VERTLIEB: You're right, Mr. Commissioner. Apparently one
23 of the police had some notes that they had, but,
24 unfortunately, there's nothing in them. There's a
25 reference, as I recall, saying we're going to meet

1 the AG, and then that's it. So that can't be what
2 Mr. Chantler's talking about because there's just
3 nothing in that disclosure.

4 THE COMMISSIONER: All right. Okay.

5 MR. VERTLIEB: But you're right, it did come from your document
6 staff pressing on that. I don't want to take
7 credit for that, I'm busy doing some other things,
8 but it is your staff doing it.

9 THE COMMISSIONER: But, in any event, that's explainable. But,
10 you know, one person at a time.

11 MR. CHANTLER: Thank you, Mr. Commissioner.

12 THE COMMISSIONER: Okay.

13 MR. CHANTLER: And while I disagree with my learned friend that
14 there's nothing in them, that's not even the
15 point. The point is we should have had these a
16 long time ago. We've been cross-examining
17 witnesses for weeks on there being no notes at
18 that crucial -- those crucial meetings. These
19 notes weren't apparently disclosed to Deputy Chief
20 Evans, upon whose report this commission may rely
21 heavily. This is completely inexcusable.

22 THE COMMISSIONER: Well, you know, I want to -- I don't want to
23 get into it between you and commission counsel,
24 but the fact is nobody knew about the notes. The
25 fact that -- you know, there's an automatic sort

1 of response or an automatic request by lawyers to
2 always ask for notes, and sometimes there aren't
3 notes. Sometimes the notes don't mean anything.
4 So many of the notes I've seen over the years are
5 just irrelevant. But the fact is here apparently
6 as a result of some further diligent research
7 they've found out that there was notes, but
8 there's nothing in them. But -- so, look, we have
9 enough work to do here without going into notes
10 that mean nothing and have nothing in them.

11 MR. CHANTLER: Let me tell you two troubling things about the
12 notes that arrived yesterday. Number one, one
13 portion of the notes are those of Staff Sergeant,
14 RCMP Staff Sergeant Henderson.

15 THE COMMISSIONER: Yes.

16 MR. CHANTLER: Our friends have expressed the view that that
17 request for his notebook had long been satisfied.

18 THE COMMISSIONER: Okay. Well --

19 MR. CHANTLER: We've been told we had all Staff Sergeant
20 Henderson's notes. We didn't. Some arrived
21 yesterday.

22 THE COMMISSIONER: Okay.

23 MR. CHANTLER: The second point I'd like to make -- and I've
24 passed these up to you, and I'd ask that you
25 please refer to them. Mr. Commissioner, this

1 document, which you should have a copy of before
2 you, is RCMP-100-000001.

3 THE COMMISSIONER: Yes.

4 MR. CHANTLER: Okay. This arrived in the Concordance database
5 yesterday.

6 THE COMMISSIONER: Yes.

7 MR. CHANTLER: Now, at the bottom of the page you can see --
8 the very bottom of the page you can see this is
9 Henderson's notes, as they're identified in the
10 file name. The last date entry is the April 9th
11 meeting, the crucial meeting with the Attorney
12 General that we have been seeking further records
13 about since at least November. Staff Sergeant
14 Henderson at the very last line of the note says,
15 "To meet with the AG Van." If you turn the page,
16 it's a completely different topic, and if you note
17 the page numbers at the top right-hand corner of
18 the actual notebook, there's a page missing.
19 Inadvertently or not, somebody has removed page 46
20 from Staff Sergeant Henderson's notebook. My
21 learned friend at the DOJ might say Occam's razor
22 was used to cut it out. And the notes relating
23 directly to the Attorney General meeting have been
24 removed from this notebook before they were
25 disclosed to the commission and uploaded to

1 Concordance. Now, Mr. Ward has used words to
2 describe the state of document production that I
3 will not use, but I suggest his concerns are
4 deserving of some respect.

5 THE COMMISSIONER: Okay.

6 MR. CHANTLER: The second set of notes that arrived yesterday,
7 handwritten notes of RCMP Corporal Bev Zaporozan,
8 were taken during the May 13th brainstorming
9 session. We've been told over and over that no
10 such notes exist repeatedly by Deputy Chief
11 LePard, Deputy Chief Evans, and Chief Constable
12 Shenher. I haven't studied these notes in detail,
13 Pickton's name does not leap off the page to me,
14 but my point is they should have been disclosed
15 long ago.

16 The second development, and this is my final
17 point, that occurred since the hearings broke
18 yesterday is with respect to our order for
19 production from the Criminal Justice Branch,
20 including for documents explaining what happened
21 to the 1997 Pickton file. When we returned to our
22 office yesterday, we had an e-mail, a helpful
23 e-mail from our friends at the Criminal Justice
24 Branch directing us to a previously disclosed
25 document. Commission counsel has pointed that

1 document out to you. It is a handwritten list of
2 files, and it was included in a package of
3 disclosure sent to us in November of 2011, still
4 after the hearings began. They've asserted to us
5 that this is a list of documents sent for
6 destruction.

7 Now, I've responded to counsel on this issue
8 in an e-mail last night, and I've handed that
9 e-mail up to you for your reference and perhaps as
10 somewhat of an aide-memoire. I've stapled to that
11 e-mail a couple of documents that help you
12 understand what the e-mail is talking about.
13 First is the original e-mail from Ms. Juba at the
14 Criminal Justice Branch, and I have appended the
15 Crown Counsel Policy Manual section which is
16 relevant, which was also -- formed a part of Ms.
17 Whitehead's affidavit yesterday, and the very last
18 page -- or, sorry, the second last page is the
19 records destruction authorization that we've
20 referred to, and the very last page is the newly
21 identified document, if I may call it that. The
22 reason I call it that is because this document was
23 disclosed to us in a disparate collection of 43
24 pages from the Criminal Justice Branch. It has no
25 title. It isn't named in any identifying fashion

1 at all. There's no index referring us to it and
2 telling us what it is. And, moreover, if we were
3 to assume it was a list of files produced by the
4 Criminal Justice Branch, in accordance with their
5 own policy, as I read it, and I've set out my
6 understanding of their policy in my e-mail, the
7 Pickton file should never have been sent for
8 destruction. If it ended up on a list of files
9 for destruction, which it appears it may have, and
10 I say that because the other files on this list
11 relate to relatively minor matters, it sticks out
12 like a sore thumb. The matters on this list
13 include failure to appear, impaired driving, peace
14 bond, a number of assaults. There is an attempted
15 murder on the list, which is the Pickton file.
16 Clearly in the Criminal Justice Branch's own
17 policy, from my interpretation of it from the
18 limited documents I have, this file should have
19 been sent for archival review and archived for 75
20 years. We have no documents that I am aware of
21 disclosed to this commission explaining why the
22 Pickton file, a very significant file of public
23 importance even before he was arrested in 2002,
24 would have been sent for destruction, and that's
25 very concerning to us.

1 THE COMMISSIONER: Well, I don't know. We'll have to ask Mr.
2 Doust.

3 MR. CHANTLER: In order for you to fulfil your mandate with
4 respect to terms of reference 4(b) you need an
5 explanation to this.

6 My friend Mr. Vertlieb -- a couple of final
7 comments -- suggested that no one had challenged
8 Deputy Chief Evans on her conclusions in the face
9 of her inadequate documentary record. I'm not
10 entirely sure that it would have been appropriate
11 to challenge her on that as much as it is to
12 suggest that in closing submissions. In any
13 event, that's something that we've intended to do,
14 so you know.

15 And, finally, the notion that this "happens",
16 that late disclosure is an inevitable part of an
17 inquiry and that we should in any way aspire to
18 what happened in Braidwood, is unfortunate. Thank
19 you, Mr. Commissioner. Those are my submissions.

20 THE COMMISSIONER: Thank you. All right. Yes.

21 MS. TOBIAS: Mr. Commissioner, Cheryl Tobias for the Government
22 of Canada. I know that you've said Mr. Chantler
23 would have the last word, but I feel obliged given
24 the nature of his comments to respond with respect
25 to the disclosure that he handed up. He pointed

1 out to you that the notes go from page 45 to 47,
2 and I will tell you that I'm advised 46 was blank,
3 but if you look from 45 to 47, at the bottom of
4 the page it says, "To meet with AG Vancouver."

5 THE COMMISSIONER: It says what?

6 MS. TOBIAS: At the bottom of the page --

7 THE COMMISSIONER: Yes.

8 MS. TOBIAS: -- that he directed you, "To meet with AG
9 Vancouver." He didn't direct you to the next
10 page, which says "Re: Missing persons". Now, I
11 understand it's not unreasonable for my friend to
12 say, "Ms. Tobias, where is page 46? Is there
13 anything on it?" What is unreasonable is to jump
14 to the conclusion that I and my colleagues are
15 working to mislead him and the commission, and
16 that's the part on which I take exception. And I
17 will tell you that I -- it was confirmed to me
18 that, no, page 46 is blank.

19 MR. CHANTLER: We'd certainly like to see page 46.

20 THE COMMISSIONER: Wait a minute. Wait a minute. Just -- I
21 don't know what it is in here. People feel
22 compelled to jump up in the middle of someone
23 else's argument. You know, there's a protocol. I
24 think lawyers know what it is. If one lawyer is
25 up, they'll finish their submission and you'll get

1 an opportunity to reply.

2 MR. CHANTLER: My apologies.

3 MS. TOBIAS: So that was my point, Mr. Commissioner. And,
4 again, this is an example of something -- it would
5 have been -- this note, as my friend has pointed
6 out, says nothing. It would have been clearly
7 within our prerogative to say this note says
8 nothing.

9 THE COMMISSIONER: All right.

10 MS. TOBIAS: It's of no help. We disclosed it. It's come to
11 our attention. It's the process I described to
12 you.

13 THE COMMISSIONER: Okay. Thank you. Mr. Dickson, do you have
14 anything more?

15 MR. DICKSON: Yes, just one point arising from Mr. Chantler's
16 reply, Mr. Commissioner. It's very quick. He
17 took you to the summons that had been issued to
18 the VPD, you know, the summons requiring us to
19 produce documents.

20 THE COMMISSIONER: Yes.

21 MR. DICKSON: And he seemed to read it in a way I certainly do
22 not read it. He said you are required -- the
23 notice, if you wish to look at it --

24 THE COMMISSIONER: No, I've seen it, but go ahead.

25 MR. DICKSON: Yes. Okay. So the notice says:

1 YOU ARE REQUIRED to produce to the Commission
2 documents in your control referencing or
3 related to the missing women investigations
4 in Vancouver's Downtown Eastside between
5 January...1997 and February...2002,

6 and as I heard him, I think he was suggesting that
7 that wording meant that the date range applied to
8 the documents when they were created, and we don't
9 read it that way at all. We --

10 THE COMMISSIONER: All right.

11 MR. DICKSON: We read it as requiring documents -- us to
12 produce documents that are relevant to the
13 investigations during that time.

14 THE COMMISSIONER: All right.

15 MR. DICKSON: And so his general production order that he
16 seeks, it would only duplicate what's already out
17 there.

18 THE COMMISSIONER: All right. Mr. Chantler, you wanted to say
19 something else.

20 MR. CHANTLER: No, I concur with my friend's correction. Thank
21 you, Mr. Dickson.

22 THE COMMISSIONER: All right. Okay. Thank you. Anything
23 else? Anybody else want to say anything? All
24 right. Because the arguments here and all sides
25 have been thorough and well organized, I'm going

1 to have to provide some written reasons for you.

2 All right. Thank you. What's happening tomorrow?

3 MR. VERTLIEB: We can start, if you wish, with Mr. Adam, who's
4 ready to go. Ms. Winteringham has asked your
5 permission to lead him, and you've granted it. So
6 we could start now, if you wish, and continue to
7 12:30 or break. I know Ms. Winteringham is here
8 and ready to start. I'm totally in her hands on
9 that.

10 THE COMMISSIONER: All right. Okay. Do you want to start now
11 or do you want to start at 9:30 in the morning?

12 MS. WINTERINGHAM: Why don't we start tomorrow at 9:30. We're
13 ready to go, but it makes sense to me that we've
14 got 20 minutes left, that we not interrupt him at
15 this stage.

16 THE COMMISSIONER: Okay. How long will you be?

17 MS. WINTERINGHAM: I expect to be a day and a half.

18 THE COMMISSIONER: A day and a half?

19 MS. WINTERINGHAM: Yes. You haven't had an opportunity yet to
20 hear about Project Evenhanded firsthand, and so
21 we're going to try to be careful to ensure that
22 you have an opportunity to understand what these
23 police officers did with respect to Project
24 Evenhanded.

25 THE COMMISSIONER: All right. Okay. All right. We'll start

1 in the morning then. Thank you.

2 THE REGISTRAR: The hearing is now adjourned until 9:30
3 tomorrow morning.

4 (PROCEEDINGS ADJOURNED AT 12:06 P.M.)

5

6 I hereby certify the foregoing to
7 be a true and accurate transcript
8 of the proceedings transcribed to
9 the best of my skill and ability.

10

11 Leanna Smith

12 Official Reporter

13 UNITED REPORTING SERVICE LTD.

14

15

16

17

18

19

20

21

22

23

24

25

INDEX OF PROCEEDINGS

	PAGE
Submissions by Ms. Tobias	1
Submissions by Mr. Majawa	23
Submissions by Mr. Skwarok	47
Submissions by Mr. Dickson	48
Submissions by Mr. Vertlieb	57
Submissions by Mr. Gratl	73
Submissions by Mr. Chantler	77
Submissions by Ms. Tobias	97
Submissions by Mr. Dickson	99

	1999 [4] - 21:3, 33:1, 33:18, 90:13 19th [2] - 20:24, 40:16 1:30 [1] - 20:22 1st [2] - 26:5, 86:8	35 [1] - 10:11	9	15:14, 29:4, 31:21, 33:1, 44:23, 55:21, 72:10, 80:24, 85:19, 85:21 addresses [1] - 28:8 adequate [1] - 47:12 adjourn [1] - 73:17 adjourned [3] - 1:13, 58:7, 102:2 Adjourned [2] - 73:18, 102:4 admissible [1] - 86:20 advance [1] - 47:18 advantage [1] - 38:5 advisable [1] - 42:15 advise [4] - 33:8, 55:7, 74:18, 80:13 advised [9] - 35:2, 35:15, 36:3, 36:22, 37:12, 37:15, 39:13, 98:2 advises [2] - 35:11, 35:23 advocate [1] - 76:14 affect [1] - 65:22 Affidavit [11] - 24:9, 25:4, 26:8, 26:11, 28:6, 29:3, 30:22, 33:2, 38:13, 39:5, 86:5 affidavit [19] - 1:14, 9:14, 23:12, 23:22, 31:4, 31:22, 33:22, 39:7, 46:6, 53:18, 53:19, 54:7, 69:17, 75:19, 77:20, 77:21, 86:5, 86:22, 95:17 affidavits [2] - 74:14, 82:5 afterthought [1] - 78:7 Ag [4] - 91:1, 93:15, 98:4, 98:8 agency [1] - 42:5 Agency [2] - 41:20, 42:4 agenda [1] - 2:12 ago [3] - 90:3, 91:16, 94:15 agree [2] - 72:3, 72:9 agreed [5] - 6:17, 17:1, 22:21, 37:1, 68:5 agreement [3] - 2:17, 5:11, 28:21 agreements [4] - 63:12, 78:24, 78:25, 82:10 ahead [6] - 2:11,
'11 [1] - 20:7 'second' [1] - 37:7		4	9 [3] - 41:18, 57:24, 87:23 911 [2] - 34:15, 35:14 95 [3] - 34:2, 34:3, 34:4 96 [1] - 26:12 96nr [2] - 1:15, 24:9 97 [4] - 28:7, 38:13, 39:4, 1:10 99 [1] - 1:11 9:30 [5] - 1:3, 58:3, 101:11, 101:12, 102:2 9th [3] - 86:8, 90:13, 93:10	
0	2	4 [3] - 10:5, 29:5, 70:8 4(b) [1] - 97:4 43 [1] - 95:23 45 [3] - 53:22, 98:1, 98:3 46 [6] - 30:5, 93:19, 98:2, 98:12, 98:18, 98:19 47 [3] - 98:1, 98:3, 1:5 48 [1] - 1:6 4th [1] - 49:4	A	
002792 [1] - 24:22 002960 [1] - 24:23 006189 [1] - 24:22 040 [1] - 24:21 064-002914 [1] - 24:19 0900 [1] - 20:21	2 [18] - 5:12, 25:24, 25:25, 28:6, 28:8, 29:4, 30:4, 30:22, 30:23, 33:2, 33:3, 33:5, 38:14, 39:5, 83:17, 83:18, 86:6, 86:22 2(d) [1] - 32:16 20 [3] - 66:13, 66:23, 101:14 2001 [2] - 40:6, 58:11 2001.10.22 [1] - 37:3 2002 [5] - 25:17, 35:11, 40:17, 87:23, 96:23 2003 [2] - 35:6, 38:3 2007 [1] - 86:9 2010 [3] - 1:23, 45:22, 61:12 2011 [20] - 2:9, 9:22, 20:5, 24:7, 24:17, 26:5, 26:10, 26:18, 28:12, 28:16, 28:17, 29:13, 33:4, 38:16, 58:7, 78:2, 78:21, 87:1, 87:19, 95:3 2012 [5] - 1:2, 16:10, 18:1, 31:6, 45:19 20th [1] - 40:16 21 [3] - 61:8, 61:12, 66:4 21st [1] - 20:5 23 [1] - 1:4 23rd [2] - 40:17, 78:9 24 [1] - 62:6 25 [2] - 64:8, 65:4 25th [1] - 42:23 26th [2] - 24:7, 26:21 27th [1] - 45:19 28 [1] - 58:6 2nd [4] - 9:22, 25:21, 26:10, 26:18	5	ability [3] - 9:7, 84:11, 102:9 able [5] - 32:11, 32:20, 41:12, 63:1, 63:15 absolutely [2] - 53:8, 56:12 Absolutely [1] - 53:9 accept [5] - 43:16, 68:3, 68:10, 79:15, 83:10 access [1] - 17:3 accompanying [1] - 31:7 accomplish [2] - 76:7, 76:17 accordance [3] - 28:20, 87:3, 96:4 account [2] - 35:22, 76:11 accurate [4] - 36:23, 37:5, 38:9, 102:7 acting [1] - 66:5 actions [2] - 53:11, 53:15 acts [1] - 84:15 actual [1] - 93:18 Adam [2] - 35:21, 101:3 add [4] - 2:14, 48:5, 88:16, 89:1 addition [2] - 58:21, 76:3 additional [2] - 21:17, 58:20 address [8] - 13:6, 21:6, 23:12, 23:22, 48:7, 55:4, 69:8, 71:18 Address [1] - 20:11 addressed [10] -	
1		5 [1] - 30:22 50 [3] - 40:24, 41:2, 41:3 52808 [1] - 70:10 53 [3] - 10:11, 10:14, 12:11 57 [1] - 1:7 5th [8] - 28:12, 29:13, 33:3, 33:11, 35:6, 38:15, 78:10, 87:1		
1 [10] - 2:23, 24:9, 25:4, 26:8, 26:12, 30:5, 46:7, 55:16, 86:5, 1:3 1(a) [1] - 54:19 10 [2] - 55:17, 63:23 10th [3] - 31:6, 52:9, 54:3 110,000 [1] - 14:5 114 [1] - 18:1 115 [1] - 18:16 116 [1] - 19:4 117 [1] - 19:18 118 [1] - 19:18 11:12 [1] - 73:18 11:30 [1] - 73:19 11th [1] - 3:1 125 [1] - 16:18 12:06 [1] - 102:4 12:30 [1] - 101:7 13:00 [1] - 20:23 13:45 [1] - 20:9 13th [3] - 20:20, 90:13, 94:8 14 [2] - 1:2, 62:24 14th [1] - 20:5 15 [2] - 62:19, 73:17 1624s [7] - 5:7, 29:25, 30:25, 31:1, 31:8, 31:12 17 [1] - 10:11 172 [1] - 20:10 17th [3] - 16:10, 16:13, 20:7 18th [4] - 2:24, 18:1, 20:20, 78:2 19 [1] - 77:20 1978 [1] - 84:5 1990s [1] - 88:19 1996 [1] - 86:8 1997 [2] - 78:10, 94:21	3	6		
	3 [8] - 26:3, 26:6, 26:7, 27:1, 28:8, 38:18, 39:6 30th [1] - 79:8 31st [1] - 78:20	6 [3] - 33:2, 35:5, 87:19 60 [1] - 41:1 68 [5] - 69:17, 69:18, 69:19 6th [3] - 24:17, 49:21, 50:3		
		7		
		7 [8] - 16:10, 16:13, 16:18, 16:23, 16:25, 36:18, 36:19, 39:6 73 [1] - 1:8 75 [1] - 96:19 76 [5] - 33:21, 34:4, 34:5, 34:6, 34:7 77 [1] - 1:9 7th [1] - 2:9		
		8		
		8 [1] - 16:25 87 [1] - 4:1 8th [1] - 25:17		

34:8, 38:17, 53:24, 57:17, 99:24
aide [1] - 95:10
aide-memoire [1] - 95:10
allegation [4] - 49:23, 49:24, 55:23, 56:13
allegations [20] - 39:1, 39:12, 42:17, 44:24, 49:25, 50:7, 50:12, 50:13, 51:14, 51:17, 51:18, 51:25, 54:13, 54:17, 55:9, 55:10, 56:3, 56:14, 56:21, 56:24
alleged [5] - 49:5, 50:1, 54:14, 59:10
allegedly [1] - 84:14
alleging [1] - 85:19
alluded [2] - 23:20, 88:4
alluding [1] - 22:11
almost [1] - 79:4
Almost [1] - 82:3
alone [1] - 72:15
alternate [1] - 78:22
alternatively [1] - 12:14
ambiguous [1] - 18:19
Amelia [4] - 4:13, 25:9, 32:2, 32:13
amended [7] - 23:7, 23:21, 27:19, 38:25, 54:2, 54:5, 55:21
amount [9] - 3:4, 3:21, 4:23, 7:8, 14:21, 19:17, 21:21, 44:2, 66:11
amply [1] - 59:3
Andrew [1] - 23:4
Angels [1] - 41:24
announced [1] - 1:24
answer [6] - 8:23, 12:10, 22:16, 31:24, 56:21, 71:23
answered [1] - 55:19
answers [2] - 13:19, 45:11
Anyway [1] - 65:8
anyway [1] - 71:3
apologies [2] - 16:17, 99:2
apologize [2] - 7:15, 9:23
apologized [1] - 45:22
Appeal [3] - 84:5, 84:22, 85:9

Appeals [1] - 85:12
appear [4] - 22:3, 43:5, 79:3, 96:13
appeared [4] - 9:3, 51:10, 55:25, 84:22
appearing [1] - 1:5
appended [3] - 74:14, 75:19, 95:14
applicable [2] - 40:10, 85:7
application [39] - 2:23, 22:14, 22:16, 23:1, 23:7, 27:18, 27:20, 40:15, 41:17, 48:3, 48:12, 48:25, 49:1, 49:21, 50:15, 50:16, 50:17, 51:2, 51:3, 54:2, 54:6, 54:19, 55:5, 55:22, 55:25, 56:2, 56:20, 58:1, 58:4, 58:13, 59:15, 68:13, 74:15, 76:2, 76:22, 81:22, 84:23, 88:12
Application [1] - 58:6
applications [3] - 22:13, 74:1, 85:23
applied [1] - 100:7
applies [1] - 85:1
apply [2] - 76:2, 88:14
appointed [2] - 61:10, 61:23
appreciate [2] - 62:24, 63:6
approach [7] - 5:12, 42:19, 68:17, 81:14, 83:20, 86:15, 86:21
approached [2] - 2:19, 34:17
appropriate [6] - 12:25, 30:3, 56:7, 78:21, 80:9, 97:10
April [4] - 79:8, 86:8, 90:12, 93:10
apron [2] - 34:19, 37:14
archival [1] - 96:19
archived [1] - 96:19
area [2] - 31:16, 37:22
areas [4] - 11:5, 40:9, 41:16, 83:14
argument [4] - 77:15, 84:17, 85:1, 98:23
arguments [1] - 100:24
arising [1] - 99:15
Armstrong [10] -

1:14, 26:8, 28:6, 29:4, 30:22, 38:14, 39:5, 46:7, 86:4, 86:23
Armstrong's [1] - 33:1
arose [3] - 12:5, 23:9, 48:6
arranged [1] - 78:23
arrangement [2] - 6:3, 17:10
arrested [2] - 40:8, 96:23
arrived [5] - 90:8, 92:12, 92:20, 93:4, 94:6
article [5] - 49:3, 49:17, 49:22, 50:2, 51:10
as-yet-unsworn [1] - 54:7
aside [1] - 68:11
aspire [1] - 97:17
assaults [1] - 96:14
assert [1] - 11:7
asserted [2] - 49:9, 95:4
assertions [1] - 74:6
assist [3] - 43:23, 70:17, 72:22
assistance [2] - 3:7, 43:10
assisting [2] - 45:3, 45:12
assume [1] - 96:3
assumptions [2] - 36:25, 37:2
attached [4] - 1:18, 28:10, 29:16, 69:22
attempt [1] - 70:11
attempted [1] - 96:14
attendance [1] - 32:25
attended [2] - 34:14, 35:13
attention [7] - 24:16, 34:22, 74:11, 75:5, 75:8, 89:11, 99:11
attorn [1] - 68:4
Attorney [2] - 93:11, 93:23
attributable [1] - 49:14
audits [1] - 8:7
August [9] - 20:7, 20:20, 20:24, 21:2, 24:7, 28:17, 45:22, 78:2, 78:20
authority [3] - 44:13, 44:20, 83:25
authorization [1] -

95:19
authorized [1] - 59:20
automatic [2] - 91:25, 92:1
available [6] - 17:15, 17:16, 27:4, 32:21, 80:25, 90:17
await [2] - 41:25, 46:13
aware [9] - 22:19, 27:13, 40:22, 42:1, 49:10, 61:18, 84:6, 89:20, 96:20

B

backdrop [1] - 61:22
bad [1] - 67:14
bar [3] - 43:11, 71:22, 71:24
barn [6] - 34:17, 37:9, 89:16, 89:19, 89:25
based [3] - 37:18, 37:19, 81:24
basis [9] - 22:8, 54:17, 55:23, 56:9, 59:4, 62:10, 64:7, 67:15, 75:15
Bass [9] - 20:16, 20:19, 20:21, 20:22, 21:13, 21:20, 21:22, 61:14, 61:25
Bass's [1] - 45:21
batch [3] - 30:13, 30:14, 90:9
battles [1] - 83:16
Bc [3] - 1:1, 41:21, 84:5
became [1] - 62:5
become [1] - 68:13
bed [1] - 72:11
began [4] - 28:16, 40:5, 48:16, 95:4
begin [1] - 24:21
beginning [1] - 7:1
behalf [4] - 45:6, 45:22, 58:9, 59:21
belief [1] - 37:21
benefit [1] - 79:19
beside [1] - 34:19
best [6] - 2:7, 6:2, 9:6, 11:11, 79:25, 102:9
between [12] - 2:17, 17:24, 29:1, 29:21, 30:19, 35:20, 47:15, 78:25, 81:19, 82:14, 91:23, 100:4

Bev [1] - 94:7
Biddlecombe's [1] - 67:7
bit [5] - 2:21, 12:7, 72:23, 74:4, 74:12
blank [3] - 32:3, 98:2, 98:18
Blizard [3] - 30:20, 30:25, 31:1
blog [7] - 48:17, 48:19, 48:24, 50:19, 50:22, 51:1, 52:10
blood [2] - 34:20, 36:8
bloody [1] - 37:13
board [1] - 42:9
boards [1] - 58:16
Boddie [2] - 86:25, 87:11
body [3] - 21:18, 22:1, 59:2
bond [1] - 96:14
book [1] - 86:12
book-ending [1] - 86:12
boss [1] - 62:2
bottom [16] - 3:13, 8:3, 16:11, 17:2, 25:24, 26:2, 26:3, 27:1, 29:5, 31:25, 34:23, 37:17, 93:7, 93:8, 98:3, 98:6
brackets [1] - 37:10
Braidwood [10] - 66:18, 67:21, 68:2, 68:3, 68:19, 84:7, 84:17, 85:8, 85:12, 97:18
brains [1] - 13:22
brainstorming [1] - 94:8
Branch [6] - 74:6, 94:19, 94:24, 95:14, 95:24, 96:4
Branch's [1] - 96:16
break [2] - 73:16, 101:7
brief [6] - 12:11, 27:20, 27:21, 35:11, 77:5, 81:18
briefly [4] - 45:5, 71:19, 83:23, 86:4
bring [5] - 50:11, 50:14, 56:19, 74:11, 75:7
British [3] - 41:20, 42:4, 45:20
broad [1] - 55:10
broadcast [2] - 86:1, 86:7

<p>broader [1] - 55:5 broke [2] - 90:5, 94:17 Brongers [2] - 68:1, 68:7 Brooks [3] - 61:23, 67:7, 71:5 brought [6] - 23:2, 24:15, 34:22, 56:21, 81:23, 89:11 Brown [4] - 20:16, 20:25, 21:13 Bryce [3] - 58:9, 59:19, 59:23 business [2] - 1:19, 64:3 busy [1] - 91:7</p>	<p>categories [6] - 2:19, 2:22, 5:21, 6:15, 55:17, 55:20 categorization [1] - 61:5 category [2] - 3:1, 10:24 Cater [4] - 35:9, 35:11, 35:15, 36:2 Catherine [2] - 39:2, 40:5 cautioned [1] - 36:24 cell [1] - 40:17 cell-plant [1] - 40:17 cent [2] - 66:13, 66:23 certain [4] - 9:1, 11:19, 74:18, 76:16 Certainly [1] - 40:3 certainly [7] - 19:13, 48:11, 52:22, 57:11, 78:6, 98:19, 99:21 certainty [1] - 80:2 certify [1] - 102:6 Cfseu [1] - 42:6 chain [1] - 11:18 challenge [2] - 65:15, 97:11 challenged [1] - 97:7 challenging [2] - 60:13, 79:25 chance [1] - 23:12 Chantler [77] - 15:7, 19:20, 22:12, 23:18, 23:24, 27:18, 28:25, 33:20, 34:10, 34:22, 38:25, 44:23, 46:25, 47:21, 47:25, 48:10, 48:11, 48:14, 48:18, 49:7, 49:9, 50:22, 51:22, 52:5, 54:1, 55:14, 57:5, 57:8, 57:12, 57:14, 67:20, 69:13, 69:16, 70:23, 71:1, 71:22, 72:2, 76:24, 76:25, 77:3, 77:5, 77:9, 79:10, 80:20, 81:1, 81:7, 82:14, 83:10, 83:12, 83:14, 84:25, 85:7, 85:16, 86:16, 86:22, 87:14, 88:11, 88:14, 89:1, 89:11, 90:15, 91:11, 91:13, 92:11, 92:16, 92:19, 92:23, 93:4, 93:7, 94:6, 97:3, 97:22, 98:19, 99:2, 100:18, 100:20, 1:9 Chantler's [6] - 40:14, 41:19, 53:19,</p>	<p>70:19, 91:2, 99:15 chapter [1] - 4:17 charges [2] - 13:14, 63:3 chart [9] - 6:21, 10:8, 10:12, 12:11, 12:12, 14:3, 26:21, 30:10, 87:12 Cheryl [2] - 1:5, 97:21 Chief [8] - 58:22, 61:24, 77:24, 91:19, 94:10, 94:11, 97:8 chilling [1] - 39:21 chosen [1] - 84:4 Chu [2] - 61:24, 77:24 circumstances [3] - 46:10, 67:22, 80:10 cited [1] - 83:25 Cjb [1] - 70:3 Cjb-003-000003 [1] - 70:6 claimed [1] - 29:9 clarified [1] - 37:6 clarify [3] - 34:21, 50:24, 67:17 classes [2] - 80:1, 82:16 clear [7] - 57:3, 65:20, 67:23, 69:3, 69:4, 71:16, 81:24 Clearly [2] - 46:1, 96:16 clearly [5] - 56:25, 59:15, 67:19, 86:9, 99:6 client [2] - 29:16, 58:9 client's [2] - 64:17, 80:6 clients [2] - 23:25, 63:11 close [1] - 14:5 closely [1] - 84:19 closing [1] - 97:12 Cohen [1] - 66:18 collaboration [1] - 47:14 colleague [12] - 10:3, 16:3, 22:24, 23:5, 24:3, 24:24, 28:3, 28:19, 43:20, 44:10, 45:8, 46:6 colleagues [4] - 60:11, 62:23, 64:25, 98:14 collected [2] - 4:11, 44:3 collection [1] - 95:23</p>	<p>collections [1] - 4:5 Columbia [3] - 41:20, 42:4, 45:20 column [4] - 7:4, 7:6, 8:4, 10:18 Combined [2] - 41:20, 42:6 coming [3] - 3:20, 62:22, 67:3 commanding [1] - 45:19 comment [9] - 18:19, 20:17, 54:11, 60:24, 64:23, 66:12, 66:23, 74:10, 78:1 commentary [1] - 15:5 commented [1] - 45:9 comments [25] - 10:4, 38:19, 47:1, 48:5, 56:19, 57:11, 57:15, 70:23, 71:23, 72:6, 72:17, 72:20, 72:21, 73:23, 77:6, 79:15, 81:2, 81:7, 81:21, 81:25, 83:10, 85:16, 88:14, 97:7, 97:24 Commission [8] - 11:4, 27:6, 58:2, 59:15, 82:20, 87:18, 94:25, 100:1 commission [93] - 2:4, 2:13, 4:15, 4:20, 5:14, 6:5, 6:12, 6:15, 7:5, 7:7, 7:10, 7:12, 9:15, 9:24, 10:8, 10:13, 12:12, 12:16, 12:19, 12:20, 12:21, 12:22, 14:18, 15:10, 16:5, 19:15, 19:24, 22:9, 22:21, 26:20, 26:23, 27:14, 28:21, 29:14, 31:5, 33:14, 39:3, 39:14, 40:7, 40:10, 41:13, 43:22, 44:12, 45:4, 45:8, 45:16, 46:9, 46:11, 46:13, 46:14, 49:6, 49:24, 50:5, 51:17, 56:5, 56:9, 57:8, 60:24, 61:2, 61:20, 62:14, 64:10, 65:1, 66:13, 68:8, 68:18, 72:5, 74:24, 75:4, 78:5, 78:18, 78:23, 78:25, 79:13, 79:14, 80:3, 80:13, 81:19, 82:1, 82:15, 82:18,</p>	<p>82:19, 84:1, 84:14, 87:3, 87:7, 90:19, 91:20, 91:23, 93:25, 96:21, 98:15 commission's [4] - 6:19, 39:24, 60:7, 79:8 Commission's [1] - 5:22 commissioned [1] - 58:23 commissioner [5] - 45:13, 67:24, 69:14, 84:10, 84:18 Commissioner [175] - 1:5, 1:7, 1:8, 1:11, 1:12, 7:18, 7:20, 8:2, 9:25, 16:12, 16:15, 16:18, 16:21, 16:24, 18:2, 20:8, 23:3, 23:4, 24:6, 26:6, 26:9, 26:11, 26:14, 26:16, 27:23, 33:23, 34:1, 34:3, 34:6, 34:7, 34:8, 35:8, 36:7, 36:11, 36:14, 36:15, 36:18, 36:20, 38:17, 39:8, 40:1, 40:12, 41:1, 41:3, 41:15, 42:11, 43:17, 45:20, 46:16, 46:18, 46:20, 46:22, 46:24, 46:25, 47:2, 47:20, 47:23, 48:1, 48:4, 48:9, 48:11, 48:13, 48:15, 49:7, 49:8, 49:13, 49:17, 50:23, 51:4, 51:22, 51:23, 52:6, 52:7, 53:17, 53:21, 53:23, 53:24, 54:18, 55:14, 57:2, 57:4, 57:7, 57:10, 57:17, 57:21, 60:4, 60:14, 61:14, 69:16, 69:18, 69:19, 69:21, 69:24, 70:1, 70:19, 70:22, 70:24, 71:10, 72:3, 72:5, 72:12, 73:15, 73:21, 73:22, 73:24, 74:12, 75:4, 75:8, 75:9, 75:13, 75:25, 76:21, 76:23, 76:25, 77:2, 77:4, 77:8, 79:9, 80:19, 80:24, 81:4, 81:6, 81:21, 82:12, 82:18, 83:11, 83:13, 84:21, 84:24, 85:6, 85:15, 86:15, 86:17, 87:13, 88:10, 88:13, 88:25, 89:10, 90:14,</p>
C				
<p>calculating [1] - 14:24 calculation [1] - 21:14 Callens [1] - 62:1 calm [1] - 49:13 Cameron [1] - 57:25 Canada [12] - 1:6, 14:1, 23:5, 28:14, 29:6, 42:18, 43:21, 45:7, 45:15, 68:9, 74:15, 97:22 Canada's [2] - 15:23, 45:10 candidly [1] - 65:14 cannot [7] - 14:19, 63:14, 63:17, 63:20, 67:25, 79:22, 85:3 captures [1] - 54:20 Cara [5] - 10:2, 87:16, 87:20, 87:22, 88:5 careful [2] - 83:20, 101:21 carefully [4] - 84:4, 85:13, 85:23, 89:20 case [13] - 4:9, 22:6, 27:8, 47:9, 77:14, 83:25, 84:7, 84:8, 84:17, 85:8, 85:12, 89:8 cases [16] - 4:1, 4:16, 24:1, 24:2, 24:3, 24:24, 25:5, 25:20, 25:23, 27:9, 52:15, 52:23, 53:3, 53:7, 53:9, 89:3 cast [1] - 56:24 categorically [1] - 11:7</p>	<p>calculating [1] - 14:24 calculation [1] - 21:14 Callens [1] - 62:1 calm [1] - 49:13 Cameron [1] - 57:25 Canada [12] - 1:6, 14:1, 23:5, 28:14, 29:6, 42:18, 43:21, 45:7, 45:15, 68:9, 74:15, 97:22 Canada's [2] - 15:23, 45:10 candidly [1] - 65:14 cannot [7] - 14:19, 63:14, 63:17, 63:20, 67:25, 79:22, 85:3 captures [1] - 54:20 Cara [5] - 10:2, 87:16, 87:20, 87:22, 88:5 careful [2] - 83:20, 101:21 carefully [4] - 84:4, 85:13, 85:23, 89:20 case [13] - 4:9, 22:6, 27:8, 47:9, 77:14, 83:25, 84:7, 84:8, 84:17, 85:8, 85:12, 89:8 cases [16] - 4:1, 4:16, 24:1, 24:2, 24:3, 24:24, 25:5, 25:20, 25:23, 27:9, 52:15, 52:23, 53:3, 53:7, 53:9, 89:3 cast [1] - 56:24 categorically [1] - 11:7</p>	<p>categories [6] - 2:19, 2:22, 5:21, 6:15, 55:17, 55:20 categorization [1] - 61:5 category [2] - 3:1, 10:24 Cater [4] - 35:9, 35:11, 35:15, 36:2 Catherine [2] - 39:2, 40:5 cautioned [1] - 36:24 cell [1] - 40:17 cell-plant [1] - 40:17 cent [2] - 66:13, 66:23 certain [4] - 9:1, 11:19, 74:18, 76:16 Certainly [1] - 40:3 certainly [7] - 19:13, 48:11, 52:22, 57:11, 78:6, 98:19, 99:21 certainty [1] - 80:2 certify [1] - 102:6 Cfseu [1] - 42:6 chain [1] - 11:18 challenge [2] - 65:15, 97:11 challenged [1] - 97:7 challenging [2] - 60:13, 79:25 chance [1] - 23:12 Chantler [77] - 15:7, 19:20, 22:12, 23:18, 23:24, 27:18, 28:25, 33:20, 34:10, 34:22, 38:25, 44:23, 46:25, 47:21, 47:25, 48:10, 48:11, 48:14, 48:18, 49:7, 49:9, 50:22, 51:22, 52:5, 54:1, 55:14, 57:5, 57:8, 57:12, 57:14, 67:20, 69:13, 69:16, 70:23, 71:1, 71:22, 72:2, 76:24, 76:25, 77:3, 77:5, 77:9, 79:10, 80:20, 81:1, 81:7, 82:14, 83:10, 83:12, 83:14, 84:25, 85:7, 85:16, 86:16, 86:22, 87:14, 88:11, 88:14, 89:1, 89:11, 90:15, 91:11, 91:13, 92:11, 92:16, 92:19, 92:23, 93:4, 93:7, 94:6, 97:3, 97:22, 98:19, 99:2, 100:18, 100:20, 1:9 Chantler's [6] - 40:14, 41:19, 53:19,</p>	<p>70:19, 91:2, 99:15 chapter [1] - 4:17 charges [2] - 13:14, 63:3 chart [9] - 6:21, 10:8, 10:12, 12:11, 12:12, 14:3, 26:21, 30:10, 87:12 Cheryl [2] - 1:5, 97:21 Chief [8] - 58:22, 61:24, 77:24, 91:19, 94:10, 94:11, 97:8 chilling [1] - 39:21 chosen [1] - 84:4 Chu [2] - 61:24, 77:24 circumstances [3] - 46:10, 67:22, 80:10 cited [1] - 83:25 Cjb [1] - 70:3 Cjb-003-000003 [1] - 70:6 claimed [1] - 29:9 clarified [1] - 37:6 clarify [3] - 34:21, 50:24, 67:17 classes [2] - 80:1, 82:16 clear [7] - 57:3, 65:20, 67:23, 69:3, 69:4, 71:16, 81:24 Clearly [2] - 46:1, 96:16 clearly [5] - 56:25, 59:15, 67:19, 86:9, 99:6 client [2] - 29:16, 58:9 client's [2] - 64:17, 80:6 clients [2] - 23:25, 63:11 close [1] - 14:5 closely [1] - 84:19 closing [1] - 97:12 Cohen [1] - 66:18 collaboration [1] - 47:14 colleague [12] - 10:3, 16:3, 22:24, 23:5, 24:3, 24:24, 28:3, 28:19, 43:20, 44:10, 45:8, 46:6 colleagues [4] - 60:11, 62:23, 64:25, 98:14 collected [2] - 4:11, 44:3 collection [1] - 95:23</p>	<p>collections [1] - 4:5 Columbia [3] - 41:20, 42:4, 45:20 column [4] - 7:4, 7:6, 8:4, 10:18 Combined [2] - 41:20, 42:6 coming [3] - 3:20, 62:22, 67:3 commanding [1] - 45:19 comment [9] - 18:19, 20:17, 54:11, 60:24, 64:23, 66:12, 66:23, 74:10, 78:1 commentary [1] - 15:5 commented [1] - 45:9 comments [25] - 10:4, 38:19, 47:1, 48:5, 56:19, 57:11, 57:15, 70:23, 71:23, 72:6, 72:17, 72:20, 72:21, 73:23, 77:6, 79:15, 81:2, 81:7, 81:21, 81:25, 83:10, 85:16, 88:14, 97:7, 97:24 Commission [8] - 11:4, 27:6, 58:2, 59:15, 82:20, 87:18, 94:25, 100:1 commission [93] - 2:4, 2:13, 4:15, 4:20, 5:14, 6:5, 6:12, 6:15, 7:5, 7:7, 7:10, 7:12, 9:15, 9:24, 10:8, 10:13, 12:12, 12:16, 12:19, 12:20, 12:21, 12:22, 14:18, 15:10, 16:5, 19:15, 19:24, 22:9, 22:21, 26:20, 26:23, 27:14, 28:21, 29:14, 31:5, 33:14, 39:3, 39:14, 40:7, 40:10, 41:13, 43:22, 44:12, 45:4, 45:8, 45:16, 46:9, 46:11, 46:13, 46:14, 49:6, 49:24, 50:5, 51:17, 56:5, 56:9, 57:8, 60:24, 61:2, 61:20, 62:14, 64:10, 65:1, 66:13, 68:8, 68:18, 72:5, 74:24, 75:4, 78:5, 78:18, 78:23, 78:25, 79:13, 79:14, 80:3, 80:13, 81:19, 82:1, 82:15, 82:18,</p>
i i i				

90:15, 90:16, 90:22, 91:4, 91:9, 91:11, 91:12, 91:22, 92:15, 92:18, 92:22, 92:25, 93:3, 93:6, 94:5, 97:1, 97:19, 97:20, 97:21, 98:5, 98:7, 98:20, 99:3, 99:9, 99:13, 99:16, 99:20, 99:24, 100:10, 100:14, 100:18, 100:22, 101:10, 101:16, 101:18, 101:25

commissioner's [1] - 84:18

Commissioner's [1] - 59:6

commissions [1] - 66:17

commitment [1] - 46:3

committed [2] - 45:3, 46:2

communicated [1] - 68:21

communication [4] - 18:24, 19:7, 31:14, 71:15

communications [6] - 10:12, 29:12, 29:17, 29:21, 81:19, 82:2

compel [3] - 44:15, 44:17, 44:20

compelled [1] - 98:22

compilation [1] - 24:4

complain [1] - 62:17

complete [4] - 39:15, 42:16, 85:4, 89:1

completely [7] - 11:21, 56:6, 81:25, 84:9, 88:24, 91:21, 93:16

complex [2] - 43:13, 83:2

complexity [1] - 10:15

complicated [2] - 43:4, 69:4

complied [1] - 80:11

compromise [1] - 38:9

conceded [1] - 80:17

concept [2] - 42:24, 42:25

concern [1] - 64:4

concerned [4] - 35:24, 44:18, 67:7, 81:20

concerning [2] - 37:2, 96:25

concerns [6] - 35:22, 62:18, 63:9, 65:12, 65:24, 94:3

conclude [2] - 19:22, 22:8

concludes [1] - 41:16

conclusion [3] - 44:5, 59:17, 98:14

conclusions [2] - 36:25, 97:8

Concordance [11] - 24:18, 30:10, 31:3, 66:24, 74:21, 75:1, 75:16, 75:17, 90:10, 93:4, 94:1

concur [1] - 100:20

conducted [4] - 21:10, 37:16, 40:16, 88:19

confidence [1] - 64:17

confidentiality [1] - 63:12

confirmed [3] - 33:8, 87:19, 98:17

confirming [2] - 89:13, 89:15

confused [1] - 71:17

confusing [1] - 67:23

confusion [2] - 69:9, 70:12

Connor [6] - 29:1, 29:22, 29:24, 30:6, 30:19

Connor's [1] - 30:24

Connors [1] - 19:6

consider [1] - 27:11

considerable [2] - 3:25, 7:7

consideration [1] - 3:5

considered [1] - 85:23

Constable [41] - 31:18, 32:24, 33:5, 33:9, 33:16, 34:25, 35:1, 35:2, 35:9, 35:10, 35:12, 35:13, 35:15, 35:16, 35:20, 35:21, 35:23, 35:24, 36:1, 36:2, 36:3, 36:4, 36:5, 36:10, 36:22, 37:1, 37:4, 37:6, 37:11, 37:15, 37:17, 37:19, 37:20, 37:21, 77:24, 94:11

constables [1] -

34:14

constitution [1] - 44:20

constitutional [2] - 39:25, 44:11

consultation [1] - 35:19

consuming [1] - 14:14

contacted [1] - 90:21

contain [1] - 11:1

contained [2] - 8:20, 23:11

content [1] - 50:22

context [3] - 49:1, 49:20, 55:24

continuation [1] - 30:5

continue [6] - 11:25, 36:21, 42:16, 79:4, 88:7, 101:6

continued [1] - 28:17

continues [1] - 45:17

contrary [2] - 43:3, 85:20

control [4] - 80:22, 81:8, 85:5, 100:2

conversation [1] - 35:10

conversations [1] - 29:10

conveyed [1] - 38:9

convince [1] - 15:8

convinced [1] - 19:11

cooperate [2] - 43:22, 46:15

cooperation [6] - 14:20, 45:17, 46:4, 46:9, 60:7, 64:20

cooperative [1] - 79:12

copied [4] - 13:10, 74:16, 74:22, 75:11

copies [2] - 16:4, 75:3

copy [7] - 11:18, 11:22, 20:21, 27:21, 54:9, 93:1

Coquitlam [2] - 8:11, 11:16

corner [2] - 70:3, 93:17

Corporal [5] - 19:6, 30:6, 39:2, 39:11, 94:7

correct [3] - 17:9, 17:13, 51:7

correction [1] - 100:20

correctly [1] - 25:22

correspondence [8] - 29:1, 30:19, 59:12, 65:10, 74:23, 75:6, 75:12, 82:5

corrupted [1] - 24:15

counsel [42] - 2:4, 2:10, 2:14, 3:5, 4:20, 6:5, 12:9, 12:12, 12:17, 12:20, 12:21, 12:23, 22:21, 27:14, 28:21, 29:2, 39:22, 56:9, 57:8, 59:19, 60:6, 62:17, 72:9, 74:17, 74:24, 75:4, 76:14, 76:15, 78:23, 79:14, 79:22, 80:21, 82:15, 82:19, 82:20, 83:9, 90:19, 91:23, 94:25, 95:7

Counsel [4] - 63:2, 63:18, 80:5, 95:15

counsel's [3] - 29:14, 46:13, 79:14

couple [9] - 12:4, 12:5, 23:9, 42:14, 76:1, 77:22, 82:4, 95:11, 97:6

course [7] - 11:14, 12:18, 30:7, 39:20, 41:7, 46:13, 66:15

court [3] - 1:10, 43:12, 68:13

Court [4] - 84:5, 84:22, 85:9, 85:11

courtroom [3] - 52:1, 90:11

cover [16] - 20:3, 20:4, 43:8, 49:5, 49:23, 49:25, 51:9, 51:20, 53:2, 53:6, 54:14, 55:23, 56:2, 56:11, 59:10, 71:20

cover-up [12] - 43:8, 49:5, 49:23, 49:25, 51:9, 51:20, 54:14, 55:23, 56:2, 56:11, 59:10, 71:20

cover-ups [1] - 53:2

covered [3] - 34:20, 53:10, 53:15

covers [1] - 13:15

created [7] - 8:25, 31:19, 39:20, 78:12, 78:14, 86:10, 100:8

credit [1] - 91:7

Crime [2] - 41:19, 42:4

Criminal [9] - 66:5, 69:1, 74:6, 94:19,

94:23, 95:14, 95:24, 96:4, 96:16

criminal [3] - 53:8, 84:14, 84:20

critical [2] - 45:9, 90:7

cross [2] - 42:21, 91:16

cross-examining [1] - 91:16

Crown [8] - 29:1, 63:2, 63:18, 64:1, 66:6, 69:10, 69:12, 95:15

crucial [3] - 91:18, 93:11

cut [2] - 86:18, 93:22

cut-off [1] - 86:18

Cv [1] - 20:21

D

damaging [1] - 56:13

dark [1] - 82:1

Darrell [2] - 57:18, 57:23

database [2] - 90:10, 93:4

date [16] - 7:4, 7:6, 7:9, 7:22, 16:15, 21:24, 47:11, 47:17, 59:16, 63:14, 78:9, 78:23, 86:8, 86:18, 93:10, 100:7

dated [13] - 2:8, 2:24, 9:21, 25:21, 26:4, 26:10, 26:17, 26:20, 28:12, 31:6, 57:24, 58:6, 87:18

dates [1] - 28:14

daughter [2] - 59:25, 60:1

Dave [1] - 37:21

David [1] - 41:23

days [1] - 73:12

Dc [10] - 6:18, 7:14, 7:19, 9:8, 15:6, 15:24, 17:24, 18:3, 19:12, 19:19

deadline [4] - 78:19, 78:21, 79:7, 79:8

deadlines [1] - 79:2

deal [6] - 12:9, 23:15, 61:5, 67:25, 68:21, 69:11

dealing [5] - 1:18, 12:25, 23:6, 23:9, 69:12

deals [2] - 10:1, 25:4

dealt [8] - 2:19, 3:24,

10:16, 15:20, 29:12, 31:16, 45:1, 68:2
Dear [2] - 55:15, 62:21
death [2] - 60:1, 87:16
December [7] - 33:3, 33:11, 38:15, 40:6, 62:19, 62:23, 86:8
decide [6] - 2:5, 4:15, 42:11, 50:14, 73:9, 83:1
decided [1] - 6:16
decides [1] - 12:21
decision [9] - 67:1, 73:8, 83:23, 83:24, 84:4, 84:6, 84:7, 85:7, 85:12
decisions [2] - 9:2, 46:13
dedicated [1] - 14:16
dedication [1] - 46:8
defend [1] - 48:21
defined [4] - 5:16, 73:10, 78:10, 86:11
definitely [1] - 52:7
deflect [1] - 68:15
deliberately [1] - 19:12
deliver [2] - 41:21, 50:15
delivered [3] - 45:21, 50:17, 86:2
demand [2] - 11:2, 59:7
demands [1] - 78:4
demonstrate [1] - 47:13
Department [26] - 14:18, 32:2, 47:15, 60:6, 60:18, 64:3, 64:21, 66:3, 67:19, 74:4, 74:8, 74:17, 74:23, 77:10, 77:15, 77:25, 79:1, 79:11, 80:15, 82:2, 82:15, 83:17, 84:15, 84:21, 88:1
department [2] - 78:12, 81:20
dependent [1] - 76:7
deployed [1] - 14:17
Deputy [8] - 45:20, 58:22, 61:14, 61:24, 91:19, 94:10, 94:11, 97:8
derailed [1] - 72:6
describe [1] - 94:2
described [1] - 99:11
description [1] -

37:18
deserving [1] - 94:4
desire [1] - 64:17
destroyed [5] - 70:9, 70:15, 71:7, 71:11, 71:12
destruction [7] - 69:10, 69:15, 95:6, 95:19, 96:8, 96:9, 96:24
detachment [1] - 8:8
Detachment [2] - 8:11, 11:16
Detail [1] - 34:9
detail [4] - 2:21, 25:18, 76:12, 94:12
detailed [2] - 3:6, 3:15
details [3] - 25:7, 35:25, 46:7
Detective [2] - 19:6, 31:18
determination [2] - 3:8, 4:25
determinations [1] - 80:7
determine [3] - 32:5, 56:23, 80:7
development [1] - 94:16
developments [1] - 90:5
dialogue [1] - 60:17
Dianne [1] - 89:4
Dickson [23] - 1:8, 48:1, 48:4, 48:15, 49:17, 52:2, 52:7, 53:22, 53:25, 55:15, 57:3, 57:16, 99:13, 99:15, 99:21, 99:25, 100:11, 100:15, 100:21, 1:6, 1:11
differ [1] - 58:5
difference [1] - 25:11
different [5] - 16:2, 25:3, 53:3, 71:14, 93:16
difficult [3] - 16:1, 80:20, 81:8
digits [1] - 30:12
diligent [2] - 66:9, 92:6
direct [2] - 30:21, 98:9
directed [3] - 80:14, 88:16, 98:8
directing [1] - 94:24
direction [1] - 41:25
directly [2] - 12:9, 93:23

dirty [1] - 37:13
disagree [1] - 91:13
disappearance [1] - 87:16
disappointing [1] - 63:14
disappointment [2] - 64:11, 65:5
disclose [1] - 30:17
disclosed [43] - 4:14, 7:6, 11:3, 19:3, 19:15, 24:13, 24:16, 24:23, 26:1, 27:3, 28:13, 28:15, 29:6, 30:8, 30:15, 31:3, 32:14, 32:15, 32:21, 37:25, 40:19, 41:14, 54:22, 54:25, 55:1, 62:16, 66:16, 78:17, 80:2, 87:21, 88:6, 88:7, 88:9, 89:4, 90:2, 91:19, 93:25, 94:14, 94:24, 95:23, 96:21, 99:10
disclosing [1] - 40:22
Disclosure [1] - 10:18
disclosure [73] - 2:2, 4:16, 5:24, 6:22, 6:25, 7:2, 7:11, 7:22, 9:16, 9:19, 10:9, 10:24, 11:2, 11:15, 12:2, 13:25, 14:3, 14:5, 15:15, 15:22, 15:24, 18:14, 18:17, 20:12, 20:14, 21:6, 21:18, 21:21, 22:7, 22:13, 24:2, 24:14, 25:4, 25:19, 26:22, 28:2, 28:16, 30:9, 30:13, 30:15, 33:14, 34:11, 38:23, 39:16, 42:21, 44:6, 46:9, 47:6, 47:16, 58:14, 59:8, 61:1, 62:4, 62:23, 63:16, 64:9, 64:12, 64:18, 65:6, 65:21, 67:3, 73:4, 74:1, 74:3, 75:11, 81:15, 89:12, 90:6, 90:9, 91:3, 95:3, 97:16, 97:25
disclosures [2] - 28:19, 28:20
discouraged [1] - 52:25
discretion [1] - 31:9
discuss [2] - 39:15, 62:23
discussed [2] -

34:25, 52:10
discusses [1] - 53:3
discussion [8] - 2:25, 35:16, 56:8, 60:5, 68:7, 71:20, 72:1
discussions [4] - 2:3, 13:1, 61:13, 82:8
disparate [1] - 95:23
dispel [1] - 56:23
distinguishable [1] - 84:9
Division [1] - 62:2
divisional [1] - 8:8
document [48] - 3:1, 4:5, 12:21, 12:22, 14:23, 28:4, 34:21, 42:20, 51:2, 54:20, 58:14, 58:24, 59:7, 60:25, 61:4, 62:4, 62:25, 63:4, 63:19, 63:23, 64:6, 65:16, 65:24, 67:2, 67:8, 67:16, 69:20, 69:22, 70:6, 70:7, 71:7, 72:14, 72:24, 73:4, 81:15, 82:3, 82:10, 87:5, 88:3, 89:19, 90:2, 91:5, 93:1, 94:2, 94:25, 95:1, 95:21, 95:22
documentary [3] - 47:5, 70:14, 97:9
documentation [2] - 19:5, 59:13
documented [1] - 9:5
documents [126] - 1:24, 2:6, 2:20, 6:1, 6:13, 6:15, 8:16, 8:18, 8:24, 13:21, 14:25, 15:25, 17:1, 17:2, 17:4, 17:14, 17:17, 18:21, 19:2, 24:5, 25:25, 27:4, 27:7, 27:8, 27:15, 27:16, 29:7, 29:18, 30:12, 32:14, 39:19, 41:22, 43:23, 43:24, 44:2, 44:3, 44:7, 47:11, 50:2, 51:8, 54:15, 54:24, 54:25, 55:4, 55:8, 55:17, 55:20, 55:25, 56:6, 58:1, 59:9, 62:25, 63:9, 63:13, 63:16, 64:5, 64:9, 64:13, 64:15, 65:7, 65:19, 66:14, 66:15, 66:24, 67:5, 67:12, 68:4, 68:6,

68:16, 68:20, 74:1, 74:7, 74:13, 74:19, 74:20, 74:25, 75:15, 75:16, 75:18, 75:23, 76:4, 78:12, 78:14, 78:17, 78:20, 79:4, 79:6, 79:13, 79:17, 79:20, 80:1, 80:17, 80:18, 80:22, 81:12, 82:16, 82:21, 82:23, 83:4, 83:18, 83:19, 83:21, 84:2, 86:10, 86:19, 88:5, 88:8, 88:9, 88:15, 88:17, 88:22, 89:6, 89:7, 89:13, 90:7, 94:20, 95:5, 95:11, 96:18, 96:20, 99:19, 100:2, 100:8, 100:11, 100:12
Documents [1] - 8:4
Doj [6] - 3:22, 61:9, 64:25, 66:4, 72:25, 93:21
dollars [1] - 53:1
done [9] - 14:8, 14:10, 14:14, 66:9, 79:16, 79:18, 79:24, 81:13, 89:23
Douist [5] - 66:4, 69:10, 70:16, 97:2
down [7] - 18:23, 21:7, 22:1, 22:23, 35:7, 49:13, 89:21
Downtown [3] - 58:11, 73:22, 100:4
dozen [1] - 22:25
Dr [5] - 42:22, 43:3, 47:4, 47:6, 47:18
draw [1] - 36:24
Drew [7] - 10:2, 23:20, 25:1, 25:15, 25:16, 27:2, 27:5
driving [1] - 96:13
dubious [1] - 12:15
due [1] - 3:5
dumped [1] - 21:20
duplicate [1] - 100:16
duplicative [1] - 4:12
during [7] - 23:10, 31:19, 35:15, 45:7, 48:6, 94:8, 100:13
duties [1] - 14:17

E

e-mail [24] - 1:20, 1:21, 10:11, 11:18, 11:22, 18:4, 18:8, 18:24, 19:5, 19:14,

19:17, 20:21, 31:11, 31:14, 53:25, 55:18, 94:22, 94:23, 95:8, 95:9, 95:11, 95:12, 95:13, 96:6
e-mails [11] - 10:20, 10:23, 11:8, 11:12, 15:17, 18:5, 19:6, 19:9, 19:11, 22:4, 31:7
early [1] - 88:19
easier [1] - 14:13
easily [1] - 63:8
Eastside [3] - 58:11, 73:22, 100:4
easy [3] - 13:10, 14:1, 29:20
echo [1] - 38:18
edited [1] - 63:8
effect [2] - 39:21, 48:19
efficient [1] - 12:25
effort [3] - 5:1, 5:10, 32:4
efforts [2] - 11:11, 43:22
either [3] - 44:1, 60:15, 74:22
elaborate [2] - 10:17, 12:7
Ellis [11] - 10:2, 23:19, 25:1, 25:12, 25:14, 27:2, 27:4, 87:16, 87:21, 87:22, 88:5
Elsie [1] - 88:15
employee [1] - 86:3
empty [1] - 32:4
enable [1] - 55:12
enabling [3] - 49:6, 49:24, 51:20
encapsulates [1] - 17:23
enclosed [3] - 24:1, 26:21, 31:15
enclosing [1] - 31:12
encounter [1] - 35:12
end [5] - 14:4, 64:19, 72:24, 73:2, 73:7
endeavour [1] - 60:13
endeavoured [1] - 6:11
ended [3] - 32:11, 96:8
ending [1] - 86:12
Enforcement [2] - 41:21, 42:7
engage [2] - 53:1,

71:19
engaged [1] - 39:19
enhance [1] - 64:16
enormous [5] - 3:4, 3:21, 4:23, 4:25, 14:2
Ens [2] - 80:23, 81:9
ensure [2] - 38:8, 101:21
entirely [5] - 41:8, 48:24, 50:4, 83:7, 97:10
entirety [2] - 88:24, 89:6
entities [1] - 42:2
entitled [1] - 76:15
entry [8] - 20:9, 35:6, 35:9, 50:19, 50:23, 51:1, 52:10, 93:10
especially [1] - 76:14
essence [2] - 5:6, 61:18
essentially [1] - 4:21
estimated [1] - 9:18
Evans [15] - 6:18, 7:14, 7:19, 9:8, 15:6, 17:24, 18:3, 19:19, 58:23, 65:12, 65:15, 65:25, 91:20, 94:11, 97:8
Evans' [2] - 15:24, 19:13
Evenhanded [9] - 4:2, 31:21, 31:25, 34:9, 40:5, 63:17, 89:2, 101:20, 101:24
event [5] - 25:17, 48:21, 84:25, 91:9, 97:13
events [2] - 37:2, 37:20
evidence [16] - 15:6, 15:13, 16:5, 19:13, 19:22, 19:25, 43:2, 43:15, 43:19, 47:11, 58:18, 58:19, 59:2, 59:9, 70:14, 90:16
exactly [3] - 4:3, 31:24, 43:12
examination [1] - 42:22
examining [1] - 91:16
example [9] - 9:1, 11:21, 21:19, 22:15, 34:11, 74:16, 75:16, 89:4, 99:4
examples [1] - 53:4
except [1] - 36:9
exception [4] - 44:24, 56:10, 61:4,

98:16
exceptions [1] - 82:4
exchange [1] - 13:4
exculpatory [1] - 38:6
excuse [1] - 77:21
Excuse [1] - 49:7
exercise [2] - 74:9, 84:20
exhaustive [1] - 2:13
Exhibit [34] - 1:15, 1:16, 1:20, 1:25, 2:8, 2:16, 6:20, 16:7, 20:3, 24:9, 24:10, 25:2, 25:3, 26:7, 26:12, 28:7, 28:10, 28:11, 29:13, 30:4, 33:4, 33:21, 34:2, 34:4, 34:5, 38:12, 38:13, 38:15, 39:4, 39:11, 69:17, 77:20, 86:5, 86:6
exhibit [8] - 9:10, 9:23, 24:11, 33:24, 33:25, 86:6, 86:23
exhibits [1] - 74:14
exist [7] - 11:12, 14:24, 16:1, 17:18, 33:9, 89:7, 94:10
existence [1] - 81:10
exists [2] - 18:22, 42:5
expect [4] - 2:5, 47:2, 54:8, 101:17
expensive [1] - 14:13
explain [3] - 11:10, 25:19, 62:10
explainable [1] - 91:9
explained [4] - 1:17, 9:14, 19:16, 31:5
explaining [3] - 24:24, 94:20, 96:21
explanation [6] - 43:1, 43:5, 43:13, 43:16, 43:25, 97:5
express [1] - 35:22
expressed [5] - 45:15, 63:8, 65:13, 65:25, 92:16
expression [1] - 76:17
extensive [5] - 6:8, 6:24, 58:14, 58:18, 58:24
extensively [1] - 25:4
extent [3] - 23:14, 32:18, 89:7
extract [1] - 20:3

extremely [1] - 66:9

F

face [1] - 97:8
fact [21] - 10:14, 13:12, 17:5, 30:8, 31:11, 37:6, 43:14, 50:17, 59:4, 76:9, 77:16, 80:10, 83:16, 84:3, 85:2, 86:9, 88:4, 88:5, 91:24, 91:25, 92:5
fact-finding [1] - 84:3
facts [1] - 76:12
failed [1] - 47:8
failing [1] - 59:16
failure [3] - 51:5, 51:8, 96:13
Failure [1] - 64:14
fair [3] - 3:20, 49:15, 72:2
faire [2] - 60:25, 64:23
fairly [1] - 68:22
faith [1] - 52:13
fallen [1] - 86:19
families [2] - 45:23, 79:23
families' [1] - 85:22
far [4] - 7:5, 30:25, 37:4, 40:3
farm [2] - 35:14, 89:17
fashion [1] - 95:25
favour [1] - 52:19
February [11] - 1:2, 25:17, 31:6, 40:16, 49:4, 49:21, 50:3, 52:9, 54:3, 57:24, 78:10
February..2002 [1] - 100:5
federal [2] - 44:14, 84:12
Feliks [4] - 23:19, 23:25, 24:20, 24:21
felt [1] - 3:5
few [8] - 7:2, 17:21, 47:1, 48:5, 57:9, 57:11, 73:23, 85:16
fifth [1] - 85:17
file [30] - 3:1, 3:7, 3:16, 3:19, 8:20, 8:25, 11:15, 11:17, 11:21, 13:20, 30:1, 31:2, 31:3, 31:10, 31:12, 36:6, 39:16, 70:15, 71:6, 89:2, 89:3, 89:4,

89:5, 93:10, 94:21, 96:7, 96:15, 96:18, 96:22
filed [3] - 27:22, 74:14, 75:19
files [20] - 3:10, 3:17, 4:13, 11:24, 13:8, 13:22, 23:18, 24:1, 24:13, 24:15, 24:17, 25:9, 70:8, 85:17, 85:22, 89:8, 95:2, 96:3, 96:8, 96:10
final [7] - 42:16, 48:10, 79:21, 87:14, 90:4, 94:16, 97:6
finally [4] - 13:18, 71:18, 89:17, 97:15
Finally [1] - 5:24
findings [2] - 76:9, 85:2
fine [1] - 61:11
finish [2] - 52:3, 98:25
finished [1] - 42:13
First [3] - 44:21, 71:21, 95:13
first [32] - 3:1, 6:16, 7:2, 10:2, 12:15, 16:8, 23:15, 25:6, 25:8, 25:18, 26:18, 27:24, 30:9, 30:12, 30:14, 34:16, 43:6, 44:8, 48:3, 52:10, 61:8, 62:5, 73:25, 74:10, 76:6, 77:13, 77:25, 80:4, 81:11, 86:23, 90:6
firsthand [1] - 101:20
five [1] - 41:2
flavour [3] - 60:18, 63:24, 72:23
flowing [1] - 5:24
focused [1] - 77:5
followed [1] - 66:6
following [5] - 7:25, 34:24, 35:19, 65:11, 66:10
fond [1] - 42:24
force [3] - 42:8, 86:1, 86:7
force-wide [2] - 86:1, 86:7
forces [3] - 18:15, 58:15, 59:1
Forces [2] - 41:20, 42:6
foregoing [1] - 102:6
forgiven [1] - 52:13
form [3] - 24:23,

74:22, 74:25
formal [4] - 37:15, 46:11, 68:5, 68:19
format [3] - 15:22, 18:18, 29:8
formed [1] - 95:16
forth [6] - 6:17, 13:2, 20:11, 22:5, 43:15, 76:13
fortunately [1] - 65:9
forward [4] - 20:2, 61:15, 85:24, 87:7
forwarded [1] - 87:8
forwarding [1] - 31:8
foundation [3] - 43:14, 50:8, 56:12
founded [1] - 77:15
four [1] - 7:13
fourth [3] - 7:15, 7:16, 83:22
frame [2] - 78:18, 88:3
frames [2] - 5:16, 28:23
frankly [2] - 41:24, 42:12
Freda[2] - 80:23, 81:9
free [1] - 39:22
freedom [1] - 76:16
frequently [1] - 49:11
Frey[1] - 38:21
Friday[5] - 23:8, 50:17, 50:18, 54:3, 75:17
friend [25] - 19:20, 23:1, 23:17, 28:18, 33:20, 38:19, 49:9, 50:24, 57:16, 71:21, 79:19, 80:17, 81:1, 81:17, 83:24, 85:25, 86:24, 88:4, 88:23, 89:11, 91:13, 93:21, 97:6, 98:11, 99:5
friend's [4] - 23:10, 81:25, 83:24, 100:20
friends [6] - 77:7, 77:9, 79:11, 85:18, 92:16, 94:23
front [1] - 20:1
frustrated [5] - 15:21, 18:13, 18:18, 22:3, 52:24
frustration [1] - 65:24
frustrations [1] - 65:13
fulfil [2] - 73:10, 97:3
fulfilling [2] - 43:24,

45:4
full [8] - 27:21, 37:25, 45:15, 45:17, 52:3, 61:3, 64:18, 70:25
full-time [1] - 61:3
fully [3] - 45:3, 46:2, 46:7
fulsome [1] - 31:24
funding [1] - 11:19
future [3] - 11:4, 45:14, 75:10

G

Galliford[3] - 39:2, 40:1, 40:5
Galliford's [2] - 39:11, 44:24
Gary[5] - 20:15, 20:22, 21:19, 21:22, 61:14
General[2] - 93:12, 93:23
general [11] - 22:10, 27:25, 28:1, 77:11, 77:17, 79:5, 79:17, 80:8, 80:11, 82:18, 100:15
generally [2] - 41:22, 51:4
Gervais [2] - 80:21, 81:5
given [6] - 12:18, 22:17, 22:18, 57:25, 65:8, 97:23
gleaned [1] - 8:16
Globe[1] - 64:13
goals [1] - 76:8
government [4] - 17:24, 42:6, 43:9, 58:16
Government[14] - 1:6, 14:1, 15:23, 23:5, 28:14, 29:6, 42:18, 43:21, 45:7, 45:10, 45:15, 68:9, 74:15, 97:21
granted [1] - 101:5
Gratl[13] - 73:21, 73:22, 73:25, 75:5, 75:10, 75:14, 76:1, 76:22, 76:23, 79:19, 81:17, 1:8
great [1] - 43:22
guess [1] - 72:24
guilty [1] - 13:16
Gulbransen[3] - 29:22, 29:25, 30:6
gun [1] - 75:18

guns [1] - 74:3

H

half [5] - 22:25, 76:25, 87:11, 101:17, 101:18
halfway [1] - 35:7
ham [1] - 53:2
ham-handed [1] - 53:2
hand [4] - 7:4, 7:6, 16:3, 93:17
handed [3] - 53:2, 95:8, 97:25
handed [1] - 52:24
hands [2] - 47:24, 101:8
handwritten [3] - 28:1, 94:7, 95:1
hang [1] - 34:15
hang-up [1] - 34:15
happenstance [1] - 24:8
happy [2] - 57:12, 80:13
hard [3] - 11:18, 11:22, 61:2
harm [2] - 79:16, 79:18
head [1] - 9:4
headed [2] - 20:6, 81:9
heading [6] - 5:22, 7:14, 7:18, 8:1, 8:13, 33:6
hear [4] - 48:9, 60:16, 89:23, 101:20
heard [10] - 3:2, 3:23, 4:17, 4:19, 51:13, 58:3, 62:16, 65:11, 66:12, 100:6
hearing [7] - 1:4, 50:7, 54:13, 55:12, 73:17, 73:20, 102:2
hearings [5] - 25:23, 78:3, 79:8, 94:17, 95:4
heavily [1] - 91:21
held [1] - 22:8
Hells[1] - 41:24
help [5] - 69:14, 72:22, 73:10, 95:11, 99:10
helpful [5] - 12:6, 21:11, 45:13, 83:15, 94:22
Henderson [2] - 92:14, 93:14
Henderson's [3] -

92:20, 93:9, 93:20
hereby [1] - 102:6
Hern[3] - 1:9, 55:17, 55:21
Hern's [2] - 38:19, 81:2
high [1] - 4:7
highlighted [1] - 30:7
highly [1] - 2:22
himself [1] - 48:21
Hira[4] - 46:22, 46:23, 84:21, 84:25
holiday [1] - 63:22
homicide [1] - 11:17
Homicide[2] - 31:2
hope [1] - 66:14
hour [1] - 77:1
hours [3] - 20:21, 40:24, 41:4
house [2] - 35:4, 35:17
huge [2] - 14:21, 54:22
human [3] - 3:24, 52:12, 89:18
hundreds [1] - 73:5
Hunter[2] - 61:9, 61:11

I

Id [1] - 31:3
idea [3] - 7:23, 75:20, 78:24
identified [2] - 93:9, 95:21
identify [1] - 80:1
identifying [1] - 95:25
identity [1] - 41:6
lds [2] - 24:18, 30:11
ignored [1] - 72:16
imagine [2] - 48:14, 90:11
Immediately [1] - 34:24
immediately [4] - 6:10, 12:1, 55:7, 67:10
immunity [1] - 44:12
impact [2] - 60:1, 72:14
impaired [1] - 96:13
impediment [1] - 69:7
importance [5] - 4:1, 36:23, 45:9, 76:20, 96:23

important [8] - 3:11, 31:13, 60:16, 65:23, 72:7, 73:5, 75:22, 77:19
impossible [1] - 82:22
impugning [1] - 50:5
inadequate [3] - 47:14, 79:3, 97:9
Inadvertently [1] - 93:19
include [3] - 82:22, 83:7, 96:13
included [6] - 23:21, 25:2, 82:8, 82:9, 83:4, 95:2
including [4] - 22:15, 43:11, 72:18, 94:20
inconsistent [2] - 29:11, 36:5
incumbent [2] - 54:15, 55:6
indeed [3] - 48:24, 49:20, 71:6
Indeed [1] - 49:17
independent [1] - 58:22
independently [1] - 4:14
Index [1] - 1:1
index [1] - 96:1
indicates [1] - 1:22
indication [2] - 15:9, 54:23
individual [1] - 67:11
individuals [3] - 28:18, 39:18, 43:10
indulgence [1] - 48:7
inefficient [1] - 5:3
inevitable [1] - 97:16
inexcusable [1] - 91:21
inextricably [1] - 52:2
informants [1] - 63:7
information [25] - 3:6, 4:11, 4:12, 5:6, 7:8, 9:4, 11:1, 14:10, 21:25, 22:1, 23:23, 23:24, 28:10, 36:4, 36:24, 37:3, 38:8, 66:21, 66:23, 68:24, 69:9, 73:9, 81:24, 87:9, 89:22
informed [1] - 88:20
initial [2] - 88:17, 90:16
input [1] - 83:15
inquire [1] - 84:11
Inquiry [5] - 58:21,

58:23, 59:5, 59:14, 59:16
inquiry [25] - 1:24, 2:7, 5:19, 8:24, 11:20, 13:9, 13:12, 13:15, 13:18, 14:15, 14:20, 45:10, 45:16, 51:15, 51:19, 58:17, 66:17, 67:24, 76:6, 79:23, 82:9, 82:17, 85:13, 86:14, 97:17
Inquiry's [1] - 87:24
inside [2] - 34:17, 52:1
Inspector [1] - 35:21
instance [1] - 25:16
instead [1] - 13:1
Instead [1] - 10:24
institution [2] - 44:14, 84:13
institutional [1] - 42:19
institutions [1] - 43:9
instructions [1] - 1:22
integrity [3] - 3:12, 50:5, 51:15
intended [3] - 8:25, 76:18, 97:13
inter [1] - 44:11
inter-jurisdictional [1] - 44:11
interaction [1] - 2:4
interest [4] - 2:14, 45:11, 46:1, 62:7
interests [2] - 73:23, 76:18
internal [2] - 39:12, 39:14
interpret [1] - 19:25
interpretation [1] - 96:17
interrupt [3] - 51:23, 51:24, 101:14
Interview [2] - 20:22, 20:24
interview [2] - 37:16, 40:16
interviews [6] - 8:16, 9:8, 21:10, 21:23, 41:4, 58:25
intro [1] - 26:19
introduce [1] - 62:3
introduction [2] - 33:12, 89:12
investigate [1] - 52:17
investigated [1] - 27:10

investigation [11] - 4:22, 29:2, 30:20, 39:13, 39:14, 39:17, 44:25, 61:17, 88:18, 88:20, 90:19
investigational [1] - 25:14
investigations [13] - 3:11, 3:12, 13:17, 41:23, 44:4, 53:11, 53:16, 78:14, 83:5, 85:3, 86:12, 100:3, 100:13
investigative [5] - 8:25, 13:20, 32:9, 39:16, 87:15
investigator [2] - 31:9, 31:19
investigators [2] - 5:14, 14:16
invited [2] - 2:13, 87:6
involved [8] - 4:22, 21:1, 41:4, 42:3, 58:25, 62:5, 68:13, 83:4
irrelevant [1] - 92:5
Irwin [1] - 59:18
issuance [1] - 84:18
issue [19] - 20:12, 21:5, 21:6, 29:10, 39:23, 44:13, 67:18, 67:22, 68:14, 69:3, 69:7, 71:14, 71:20, 84:2, 84:10, 85:13, 88:6, 89:20, 95:7
issued [6] - 77:16, 77:24, 78:2, 78:4, 79:11, 99:17
issues [7] - 60:10, 64:16, 65:21, 68:1, 68:12, 73:1, 73:2
item [4] - 3:25, 10:11, 10:14, 12:3
items [4] - 12:12, 22:14, 22:24, 65:10
itself [2] - 3:21, 58:4

J

January[10] - 16:10, 16:13, 18:1, 42:23, 45:18, 58:11, 63:23, 64:8, 65:4, 78:9
January..1997 [1] - 100:5
Jason[1] - 73:22
Jennifer[1] - 58:22
Jim[4] - 20:16, 20:25, 77:24

job [2] - 66:10, 73:13
Johnson[2] - 58:10, 59:25
joint [2] - 42:8, 42:9
Juba[1] - 95:13
Judy[1] - 61:2
jump [3] - 70:24, 98:13, 98:22
June[1] - 20:5
jurisdiction [6] - 44:15, 44:17, 68:5, 69:1, 69:2, 84:1
jurisdictional [7] - 44:11, 67:18, 67:22, 68:11, 68:14, 69:3, 69:7
Justice[25] - 14:19, 60:6, 60:18, 64:3, 64:21, 66:5, 67:19, 69:1, 74:5, 74:6, 74:17, 74:23, 77:10, 79:12, 82:15, 83:17, 84:16, 84:21, 88:1, 94:19, 94:23, 95:14, 95:24, 96:4, 96:16
justice [1] - 53:8
Justicés [1] - 82:2

K

Keable[3] - 83:22, 84:10, 85:7
keen [1] - 45:10
keep [1] - 38:2
keeping [2] - 21:16, 27:9
kept [2] - 55:24, 76:10
key [1] - 5:13
kind [4] - 11:19, 22:9, 22:10, 54:20
kinds [3] - 6:13, 7:23, 8:24
knife [4] - 35:18, 36:8, 37:8, 89:17
knowledge [4] - 28:5, 36:6, 85:10
known [2] - 42:24, 71:13

L

laissez [2] - 60:25, 64:23
laissez-faire [2] - 60:25, 64:23
language [1] - 56:11
large [8] - 4:9, 8:11, 12:13, 14:16, 14:22, 17:4, 21:18, 21:21

largely [1] - 4:12
larger [1] - 26:12
last [23] - 2:11, 3:13, 5:21, 9:10, 40:13, 48:12, 48:14, 50:2, 55:14, 59:10, 60:22, 64:14, 72:18, 87:4, 93:10, 93:14, 95:8, 95:17, 95:18, 95:20, 97:23
Last[1] - 90:7
lastly [1] - 76:1
late [6] - 20:12, 20:14, 21:6, 89:11, 90:6, 97:16
latitude [1] - 76:16
law [2] - 69:5, 84:20
lawyer [4] - 61:9, 61:12, 98:24
lawyers [4] - 63:20, 63:25, 92:1, 98:24
Lead[1] - 32:6
lead [4] - 32:7, 59:19, 61:9, 101:5
Leanna[1] - 102:11
leap [1] - 94:13
learned [11] - 43:20, 44:10, 46:5, 71:21, 77:7, 79:11, 80:21, 83:23, 90:8, 91:13, 93:21
least [4] - 60:13, 78:6, 87:10, 93:13
leave [4] - 33:17, 38:12, 42:10, 72:15
led [2] - 42:8, 88:19
left [4] - 7:3, 42:15, 79:22, 101:14
legal [2] - 42:2, 62:10
legitimate [1] - 64:4
Lenger[15] - 34:25, 35:2, 35:12, 35:13, 35:16, 35:21, 35:23, 35:24, 36:10, 36:22, 37:1, 37:6, 37:11, 37:19, 37:21
length [1] - 10:15
lengthy [4] - 8:6, 10:1, 57:21, 57:23
Lepard[3] - 52:21, 61:24, 94:11
less [4] - 14:13, 78:2, 85:7
letter [44] - 1:17, 2:8, 2:12, 2:23, 3:9, 9:21, 9:23, 10:1, 10:5, 10:6, 10:7, 24:8, 25:2, 25:17, 25:21, 26:4, 26:10, 26:17, 26:20, 28:12, 29:13, 30:4,

31:6, 33:3, 33:11, 38:16, 38:18, 39:10, 57:18, 57:21, 59:18, 61:8, 61:11, 62:5, 62:19, 64:8, 65:4, 86:24, 86:25, 87:7, 87:8, 87:14, 87:18
letters [4] - 9:10, 9:14, 66:7, 82:14
Liaison[1] - 80:17
life [1] - 45:25
light [2] - 88:1, 88:2
likely [6] - 14:25, 37:12, 40:9, 43:1, 43:2, 63:5
limit [3] - 5:13, 44:19
limitations [1] - 39:25
limited [4] - 22:15, 40:8, 41:9, 96:18
line [6] - 3:13, 6:23, 29:5, 31:25, 93:14
list [13] - 2:15, 6:13, 6:14, 21:16, 28:16, 70:8, 95:1, 95:5, 96:3, 96:8, 96:10, 96:12, 96:15
listed [1] - 31:4
listing [4] - 10:8, 26:21, 29:17, 30:11
lists [2] - 28:12, 55:16
live [1] - 34:18
locate [4] - 11:12, 16:2, 32:5, 32:12
located [1] - 32:20
logs [1] - 5:7
longest [1] - 77:1
look [15] - 2:20, 6:23, 7:1, 16:8, 30:10, 43:6, 53:22, 61:15, 70:3, 75:23, 77:21, 89:2, 92:8, 98:3, 99:23
looks [4] - 53:12, 53:14, 71:6
Lorj[2] - 31:18, 32:17
loss [1] - 44:2
losses [1] - 45:24
lost [2] - 49:2, 75:24
Ltd[1] - 102:13
Lynn[1] - 38:21

M

machinery [1] - 41:9
Macintyre [1] - 61:25
magic [1] - 69:4
magical [1] - 67:23
Mail [1] - 64:13
mail [24] - 1:20, 1:21,

10:11, 11:18, 11:22, 18:4, 18:8, 18:24, 19:5, 19:14, 19:17, 20:21, 31:11, 31:14, 53:25, 55:18, 94:22, 94:23, 95:8, 95:9, 95:11, 95:12, 95:13, 96:6

mails [11] - 10:20, 10:23, 11:8, 11:12, 15:17, 18:5, 19:6, 19:9, 19:11, 22:4, 31:7

main [1] - 41:16

maintain [2] - 29:15, 31:9

maintained [4] - 29:8, 30:1, 41:7, 68:17

Majawa [32] - 10:3, 16:17, 23:4, 24:7, 26:7, 26:10, 26:12, 26:15, 26:17, 27:24, 33:25, 34:2, 34:4, 34:7, 34:9, 35:9, 36:9, 36:13, 36:16, 36:19, 36:21, 38:18, 39:10, 40:3, 40:13, 41:2, 41:4, 41:16, 46:17, 46:19, 1:4

male [4] - 35:3, 35:25, 37:7, 37:8

man [6] - 34:18, 35:17, 37:12, 89:14, 89:15, 89:25

management [4] - 19:8, 42:9, 47:8, 68:1

manager [1] - 61:4

mandate [4] - 43:24, 45:4, 73:10, 97:3

manipulating [1] - 52:18

manual [1] - 69:12

Manual [1] - 95:15

March [4] - 2:9, 2:24, 2:25, 35:11

Marion [3] - 58:9, 59:19, 59:23

Mark [1] - 47:4

marked [3] - 1:15, 16:7, 33:24

massive [1] - 66:11

material [24] - 3:4, 4:23, 5:10, 6:9, 11:5, 14:21, 15:2, 15:9, 15:11, 19:23, 21:9, 21:10, 22:8, 32:9, 34:12, 41:25, 59:9, 60:21, 62:9, 62:13, 63:7, 70:18, 70:19,

73:7

materials [3] - 15:15, 21:13, 25:14

matter [14] - 1:10, 2:18, 10:22, 13:1, 13:7, 13:12, 13:25, 14:24, 16:2, 22:11, 23:15, 35:1, 54:19, 60:20

matters [7] - 2:14, 12:4, 15:14, 23:9, 73:8, 96:11, 96:12

maximum [1] - 14:9

Mccarl [1] - 20:17

mean [5] - 64:6, 70:24, 86:19, 92:3, 92:10

meaning [1] - 76:8

meant [2] - 2:13, 100:7

media [6] - 48:20, 48:24, 49:10, 50:11, 54:12, 55:11

meet [7] - 2:7, 59:16, 61:23, 90:25, 93:15, 98:4, 98:8

meeting [8] - 2:9, 2:17, 2:25, 34:24, 61:14, 93:11, 93:23

meetings [2] - 90:13, 91:18

member [4] - 71:22, 71:24, 72:19, 86:3

members [3] - 11:16, 28:22, 43:11

members' [2] - 27:25, 33:7

memo [1] - 67:8

memoire [1] - 95:10

mention [4] - 25:23, 35:17, 42:24, 59:22

mentioned [10] - 3:8, 23:20, 35:3, 35:13, 35:25, 36:1, 37:24, 38:21, 44:9, 89:12

merely [1] - 86:17

merits [1] - 67:2

middle [1] - 98:22

might [3] - 14:24, 67:12, 93:21

mildest [2] - 64:12, 65:5

million [2] - 83:18, 83:19

mind [5] - 18:25, 21:17, 27:9, 38:2, 55:25

minimize [1] - 52:18

minor [1] - 96:11

minute [4] - 8:14,

51:23, 98:20

minutes [3] - 42:14, 73:17, 101:14

mis [1] - 71:3

misconduct [1] - 84:19

mislead [1] - 98:15

misplaced [1] - 64:24

misreports [1] - 49:11

missed [3] - 16:17, 16:19, 70:21

Missing [2] - 31:20, 98:10

missing [28] - 4:6, 4:7, 23:18, 25:12, 25:16, 27:7, 32:3, 32:6, 32:12, 32:19, 47:10, 53:11, 53:16, 58:10, 61:17, 71:8, 78:13, 79:24, 85:2, 85:22, 86:12, 87:20, 87:22, 89:2, 89:9, 89:18, 93:18, 100:3

mission [1] - 84:3

mistakes [4] - 52:12, 52:17, 53:7

misunderstanding [1] - 71:2

moment [1] - 69:16

Monday [6] - 49:21, 50:2, 55:5, 58:3, 59:11, 72:18

money [1] - 52:16

month [1] - 87:11

months [7] - 2:10, 40:6, 60:22, 61:7, 65:11, 78:3, 89:17

moreover [2] - 75:14, 96:2

morning [7] - 23:14, 54:3, 60:5, 73:16, 101:11, 102:1, 102:3

most [6] - 4:24, 12:25, 32:6, 43:1, 73:5

mother [1] - 58:9

motion [4] - 40:14, 67:2, 72:14, 73:11

move [2] - 56:23, 68:11

multiple [2] - 13:1, 43:9

murder [6] - 38:4, 47:9, 63:3, 64:1, 70:11, 96:15

murdered [1] - 58:12

must [3] - 19:11, 41:7, 60:21

N

name [3] - 70:9, 93:10, 94:13

named [1] - 95:25

namely [1] - 68:19

names [2] - 63:5, 83:3

narrow [1] - 88:3

Nathanson [2] - 59:19, 60:3

National [1] - 49:3

Native [1] - 80:16

nature [2] - 6:24, 97:24

nearly [2] - 58:25, 67:3

Neave [2] - 67:9, 67:15

necessarily [5] - 9:5, 13:20, 31:14, 32:9, 78:15

necessary [5] - 24:12, 33:19, 34:20, 59:4, 80:9

need [11] - 6:7, 44:6, 46:10, 47:18, 62:4, 68:16, 70:24, 72:10, 73:9, 73:13, 97:4

needed [2] - 5:10, 41:5

needs [3] - 2:7, 14:17, 65:1

never [14] - 11:6, 13:23, 15:24, 32:20, 35:3, 35:16, 36:1, 68:3, 74:16, 74:21, 81:13, 84:21, 87:8, 96:7

nevertheless [1] - 51:19

new [4] - 11:5, 74:3, 74:19, 74:25

newly [2] - 29:18, 95:20

newspapers [1] - 65:7

Next [2] - 4:17, 6:20

next [18] - 1:25, 3:25, 9:22, 20:23, 31:17, 32:23, 36:10, 36:13, 36:16, 38:11, 38:24, 50:16, 55:13, 58:3, 70:7, 73:12, 86:22, 98:9

night [4] - 37:23, 54:10, 90:7, 95:8

nobody [2] - 90:17, 91:24

non [1] - 11:1

non-privileged [1] - 11:1

none [2] - 82:4, 85:20

normal [2] - 56:7, 66:17

normally [1] - 22:13

note [24] - 5:18, 6:24, 7:4, 20:1, 20:11, 20:13, 20:18, 20:24, 25:6, 25:8, 25:24, 26:2, 39:25, 40:4, 41:17, 42:13, 42:21, 45:18, 73:25, 82:6, 93:14, 93:16, 99:5, 99:7

notebook [4] - 92:17, 93:18, 93:20, 93:24

notebooks [9] - 4:17, 4:21, 5:5, 27:25, 28:4, 28:9, 28:13, 33:7, 33:16

noted [4] - 10:22, 33:6, 34:23, 40:17

notes [44] - 5:13, 5:15, 16:6, 19:19, 20:4, 20:6, 20:9, 20:15, 20:19, 22:15, 22:17, 22:18, 22:20, 28:1, 31:17, 32:17, 32:18, 32:23, 33:9, 90:12, 90:17, 90:18, 90:23, 91:17, 91:19, 91:24, 92:2, 92:3, 92:4, 92:7, 92:9, 92:12, 92:13, 92:20, 93:9, 93:22, 94:6, 94:7, 94:10, 94:12, 98:1

nothing [14] - 7:9, 13:11, 30:16, 56:25, 67:23, 90:24, 91:3, 91:14, 92:8, 92:10, 99:6, 99:8

notice [16] - 1:20, 23:7, 23:11, 23:21, 27:19, 27:22, 38:25, 41:19, 54:2, 54:5, 55:22, 57:25, 74:21, 75:22, 99:23, 99:25

Notice [1] - 58:5

notices [1] - 84:19

notification [1] - 74:25

notified [1] - 75:14

notion [1] - 97:15

November [9] - 9:22, 20:5, 25:21, 26:5, 26:10, 26:17, 62:6, 93:13, 95:3

Nowhere [1] - 65:15
nowhere [1] - 65:17
number [17] - 3:3,
4:9, 7:21, 8:12, 17:4,
31:3, 32:3, 41:21,
54:22, 58:19, 58:20,
60:22, 66:7, 69:14,
70:10, 73:12, 96:14
Number [1] - 92:12
numbered [1] - 7:16
numbers [2] - 70:4,
93:17
numerous [3] -
28:17, 43:10, 78:17

O

objected [1] - 48:18
objective [3] - 12:16,
38:3, 38:7
obligation [1] - 80:6
oblige [1] - 41:14
obliged [2] - 8:21,
97:23
oblique [1] - 52:20
observed [3] - 18:25,
19:4, 34:18
obtain [1] - 12:23
obtained [4] - 8:6,
17:19, 21:23, 32:1
obtaining [1] - 45:11
obviously [2] - 48:1,
54:21
Occam's [3] - 42:24,
43:12, 93:21
occurred [3] - 21:2,
52:23, 94:17
occurs [1] - 35:20
October [10] - 1:23,
26:20, 28:12, 29:13,
58:6, 61:8, 61:12,
66:4, 86:25, 87:23
offence [1] - 9:1
office [6] - 29:14,
62:22, 75:20, 87:3,
90:8, 94:22
officer [2] - 45:19,
89:21
officers [8] - 4:22,
5:16, 21:1, 38:1,
43:12, 59:1, 67:11,
101:23
offices [1] - 58:16
Official [1] - 102:12
often [2] - 8:20,
60:10
old [3] - 63:4, 63:19,
64:2
once [5] - 14:8,
14:11, 33:10, 39:14,

72:11
one [43] - 3:3, 3:25,
4:18, 9:12, 13:3,
13:14, 16:17, 16:19,
19:21, 20:25, 26:13,
27:24, 28:4, 34:13,
34:15, 43:2, 43:17,
43:18, 46:25, 47:10,
48:7, 55:19, 62:7,
63:19, 65:14, 67:23,
68:10, 69:8, 69:13,
69:15, 70:1, 70:13,
71:16, 76:9, 76:13,
90:22, 91:10, 92:12,
97:7, 98:24, 99:15
One [4] - 12:8, 42:16,
62:25, 67:6
ones [2] - 8:17,
24:22
ongoing [6] - 3:10,
15:2, 39:17, 44:25,
56:9, 83:5
opening [1] - 45:7
openness [1] - 46:4
operator's [1] - 41:6
opinion [10] - 30:2,
37:17, 52:18, 53:7,
60:2, 65:16, 65:17,
65:18, 65:20, 65:22
opportunity [8] -
47:3, 51:13, 52:3,
57:5, 70:25, 99:1,
101:19, 101:22
oral [2] - 58:18,
58:19
order [14] - 19:24,
44:6, 46:12, 47:18,
76:17, 77:11, 77:13,
77:17, 79:5, 79:16,
83:20, 94:18, 97:3,
100:15
Order [2] - 1:4, 73:20
orders [6] - 79:6,
80:8, 80:11, 80:12,
85:18, 85:20
organization [1] -
81:9
Organized [2] -
41:19, 42:4
organized [1] -
100:25
original [4] - 8:19,
87:20, 89:25, 95:13
originally [1] - 66:3
Ottawa [1] - 8:7
ought [5] - 76:10,
81:22, 82:7, 82:9,
90:2
ourselves [1] - 62:3
outset [1] - 30:16

outside [8] - 40:18,
51:25, 78:15, 78:18,
86:10, 86:20, 87:23,
88:3
Overall [1] - 74:8
overalls [1] - 37:13
overemphasize [1] -
14:19
overriding [2] -
76:10, 76:19
own [6] - 52:17,
60:10, 62:18, 65:13,
96:5, 96:16

P

pace [1] - 15:21
package [1] - 95:2
packages [4] - 6:21,
9:19, 21:16, 21:17
Packages [1] - 8:14
page [70] - 2:23,
5:12, 7:15, 7:17, 7:25,
8:3, 8:9, 8:10, 10:5,
16:10, 16:11, 16:18,
16:23, 18:1, 18:16,
19:4, 19:18, 20:3,
20:4, 20:6, 20:19,
25:24, 25:25, 26:3,
27:1, 28:8, 30:3,
30:11, 30:23, 33:2,
33:5, 34:16, 34:23,
35:5, 35:7, 36:10,
36:14, 36:19, 38:18,
39:6, 54:11, 55:16,
69:13, 69:15, 70:1,
70:7, 70:8, 71:8, 86:6,
87:4, 93:7, 93:8,
93:15, 93:17, 93:18,
93:19, 94:13, 95:18,
95:20, 98:1, 98:4,
98:6, 98:10, 98:12,
98:18, 98:19
Page [5] - 16:13,
26:6, 26:7, 36:18, 1:2
pages [13] - 7:2,
7:13, 7:16, 8:12, 14:5,
16:6, 17:5, 20:10,
25:19, 30:4, 73:6,
77:22, 95:24
Pages [1] - 8:5
pall [1] - 56:23
paragraph [12] -
5:22, 28:8, 29:5,
30:22, 33:2, 33:6,
36:16, 36:17, 39:6,
41:18, 54:23, 87:14
Paragraph [1] -
54:19
paragraphs [2] -

55:2, 55:3
Pardon [1] - 81:4
parenthetically [2] -
18:20, 82:7
part [6] - 5:5, 31:13,
90:19, 95:16, 97:16,
98:16
participant [1] -
12:20
participants [10] -
14:9, 14:12, 23:24,
28:6, 42:19, 63:11,
75:3, 75:11, 75:14,
87:7
particular [11] - 2:22,
3:7, 5:21, 5:25, 6:13,
7:12, 10:7, 13:13,
24:5, 26:24, 61:3
particularize [2] -
50:12, 56:3
particularly [7] -
8:18, 17:6, 23:13,
35:24, 41:5, 67:14,
83:8
parties [7] - 2:18,
80:10, 82:8, 82:22,
83:3, 83:7, 83:8
party [4] - 12:24,
67:20, 80:5, 82:20
pass [1] - 18:22
passage [1] - 44:1
passed [1] - 92:24
passing [1] - 15:19
past [4] - 23:8, 35:4,
45:12, 46:17
Patricia [2] - 58:10,
59:25
pause [1] - 20:12
peace [1] - 96:13
Peck [2] - 46:20,
46:21
Peel [1] - 44:18
people [4] - 13:23,
60:19, 61:1, 72:22
People [1] - 98:21
per [2] - 66:13, 66:23
perception [1] - 76:7
perfect [3] - 11:13,
11:21, 15:3
Perhaps [1] - 76:25
perhaps [6] - 12:15,
69:9, 79:7, 87:10,
89:14, 95:9
period [7] - 78:10,
78:13, 78:15, 78:16,
86:10, 87:23, 88:21
periodic [1] - 9:15
permission [1] -
101:5
permits [1] - 85:13

perpetrated [1] -
43:8
Person [1] - 31:20
person [11] - 4:6,
9:4, 23:18, 24:5,
25:12, 36:8, 59:24,
81:11, 85:22, 89:2,
91:10
personal [2] - 56:16,
56:17
persons [3] - 27:8,
87:20, 98:10
pertain [2] - 4:24,
22:25
pertained [1] - 21:19
pertaining [1] - 8:18
pertains [1] - 19:9
petition [1] - 84:22
Pickton [32] - 4:7,
11:20, 11:24, 13:7,
13:13, 13:16, 24:1,
24:2, 29:3, 30:21,
32:25, 33:18, 34:14,
35:14, 37:22, 38:4,
38:6, 38:10, 40:8,
40:15, 41:23, 58:12,
63:3, 64:1, 70:11,
70:15, 71:6, 89:16,
94:21, 96:7, 96:15,
96:22
Pickton's [3] - 70:9,
71:13, 94:13
pieces [1] - 19:21
pigs [1] - 34:18
pinpoint [1] - 79:23
place [7] - 2:17, 3:3,
4:14, 4:19, 60:17,
80:4, 87:4
placed [1] - 80:4
plan [1] - 3:15
plane [1] - 20:10
plans [1] - 2:10
plant [1] - 40:17
play [2] - 76:5, 76:14
pleasant [1] - 59:24
pleased [2] - 27:11,
57:5
pledge [1] - 11:25
plus [1] - 55:20
Pm [1] - 102:4
point [34] - 2:1, 9:3,
9:16, 10:10, 10:16,
22:12, 28:3, 30:18,
38:24, 42:16, 48:8,
50:25, 53:12, 65:23,
69:8, 72:9, 73:5,
77:14, 79:21, 80:14,
81:16, 83:22, 85:17,
87:1, 87:5, 90:1, 90:4,
91:15, 92:23, 94:14,

94:17, 99:3, 99:15
pointed [4] - 10:6,
94:25, 97:25, 99:5
points [3] - 27:17,
47:1, 77:3
police [23] - 18:15,
43:9, 47:8, 49:5,
49:23, 49:25, 51:8,
51:18, 52:11, 52:16,
52:25, 53:6, 53:10,
53:14, 54:14, 58:15,
59:1, 67:11, 71:13,
78:11, 90:23, 101:23
Police [15] - 1:9,
32:1, 44:18, 47:15,
61:24, 64:21, 66:2,
68:25, 74:8, 77:9,
77:14, 77:25, 79:1,
80:15, 80:16
Policies [1] - 8:1
policies [9] - 1:18,
1:19, 8:6, 8:7, 8:8,
8:9, 19:14, 67:25,
84:12
Policy [1] - 95:15
policy [7] - 8:12,
13:21, 42:10, 69:12,
96:5, 96:6, 96:17
portion [1] - 92:13
position [14] - 15:23,
26:3, 27:2, 39:4, 47:7,
51:6, 59:2, 61:15,
62:1, 68:8, 68:21,
89:21, 89:25
possessing [1] -
37:7
possession [8] -
39:1, 54:21, 80:22,
81:8, 81:23, 82:21,
85:4, 87:9
possible [4] - 11:6,
14:10, 14:22, 61:21
Post [1] - 49:3
post-2002 [1] - 27:10
poster [1] - 4:7
potential [3] - 11:18,
63:5, 88:2
preceding [1] - 71:7
predictable [1] - 53:1
prefer [1] - 57:13
preliminary [1] -
10:22
prepared [1] - 9:7
preparing [1] - 11:15
prerogative [1] -
99:7
pressing [1] - 91:6
presumably [1] -
74:19
prevent [1] - 45:24

previously [5] - 26:1,
29:19, 36:1, 37:11,
94:24
primarily [1] - 77:15
primary [2] - 47:7,
78:7
principle [4] - 44:11,
69:5, 76:10, 76:19
principles [3] - 76:1,
76:5, 76:13
Priority [1] - 5:23
priority [2] - 6:12,
6:19
privacy [1] - 39:18
private [2] - 35:1,
78:24
privilege [3] - 29:9,
29:16, 74:18
privileged [1] - 11:1
problem [8] - 20:14,
40:21, 56:5, 74:13,
75:2, 78:7, 78:8,
78:19
problems [3] - 18:5,
18:17, 24:14
procedure [4] -
12:18, 12:19, 82:18,
87:4
procedures [3] - 2:6,
42:10, 84:12
proceeded [1] - 58:8
Proceedings [5] -
1:3, 73:18, 73:19,
102:4, 1:1
proceedings [4] -
1:15, 16:8, 24:10,
102:8
process [19] - 3:16,
3:18, 3:20, 6:7, 9:20,
11:10, 11:13, 15:2,
15:3, 42:20, 46:3,
56:13, 60:9, 62:18,
72:24, 83:3, 99:11
Procyk [9] - 34:25,
35:10, 35:20, 35:23,
36:3, 36:5, 37:4,
37:15, 37:17
Procyk's [2] - 36:6,
37:20
produce [12] - 5:10,
5:17, 13:10, 43:23,
51:8, 64:14, 78:12,
82:23, 83:17, 99:19,
100:1, 100:12
produced [18] - 4:12,
4:20, 5:8, 6:5, 10:20,
11:9, 12:22, 18:9,
24:6, 24:7, 41:12,
43:25, 63:1, 63:21,
67:13, 78:16, 89:5,

96:3
product [1] - 2:3
production [19] -
5:13, 39:21, 44:15,
44:17, 46:12, 51:3,
77:11, 77:17, 78:20,
79:2, 79:17, 80:9,
81:15, 82:3, 82:11,
84:2, 94:2, 94:19,
100:15
profession [1] -
72:19
profile [1] - 4:8
Project [13] - 4:2,
4:13, 25:9, 31:21,
31:25, 32:2, 32:13,
34:9, 40:5, 63:17,
89:2, 101:20, 101:23
promises [1] - 74:5
proper [1] - 83:7
properly [3] - 24:16,
41:12, 85:3
property [1] - 89:16
proposition [1] -
83:25
prosecuting [1] -
38:4
prosecution [1] -
38:10
protect [1] - 3:12
protocol [2] - 5:1,
98:23
prove [4] - 9:1,
13:16, 43:2, 47:6
provide [15] - 3:15,
6:2, 8:21, 22:22,
26:23, 27:14, 30:1,
30:2, 59:4, 61:19,
63:15, 64:18, 65:1,
74:7, 101:1
provided [17] - 9:8,
21:24, 27:16, 29:24,
31:20, 33:10, 33:15,
36:4, 37:18, 44:19,
58:15, 62:9, 75:3,
78:19, 78:22, 79:13
providers [1] - 62:15
provides [1] - 22:7
providing [2] -
31:23, 33:13
provincial [2] - 42:5,
67:24
public [7] - 14:12,
52:18, 63:10, 64:4,
76:7, 76:17, 96:22
published [1] - 50:19
purpose [2] - 25:3,
86:11
purposes [2] - 75:24,
77:18

pursuant [1] - 46:14
put [15] - 13:7, 14:1,
18:25, 20:2, 31:1,
42:25, 43:3, 43:15,
55:11, 66:24, 67:9,
67:19, 72:11, 79:19,
85:24
putting [1] - 49:15

Q

Qc[1] - 59:19
qualified [1] - 65:18
quality [1] - 65:22
questions [5] - 8:23,
12:5, 39:22, 40:2,
45:11
quick [3] - 14:1,
84:8, 99:16
quickly [2] - 48:23,
63:1
Quite[1] - 85:20
quite [6] - 7:21, 13:4,
25:18, 31:5, 51:11,
89:1
quoting [1] - 49:18

R

raised [4] - 38:24,
50:2, 50:6, 87:2
range [3] - 78:9,
86:8, 100:7
rarely [1] - 21:14
rather [3] - 37:9,
37:13, 78:9
razor [3] - 42:24,
43:13, 93:21
Rcmp[36] - 3:21,
10:19, 11:6, 11:11,
11:16, 14:15, 18:7,
23:1, 29:15, 32:11,
33:7, 33:8, 36:11,
38:5, 39:1, 39:13,
42:8, 42:9, 44:14,
45:2, 45:23, 46:1,
47:16, 61:16, 62:8,
68:1, 68:9, 68:23,
79:10, 85:5, 85:14,
86:3, 90:7, 92:14,
94:7
Rcmps [2] - 45:15,
45:19
Rcmp001 [1] - 30:11
Rcmp040-002787 [1] -
24:20
Rcmp064-001953 [1] -
24:19
Rcmp100-000001 [1] -
93:2

Rcmpld [1] - 42:8
re [2] - 24:16, 64:9
Re[1] - 98:10
re-disclosed [1] -
24:16
reaction [1] - 72:20
read [13] - 14:23,
19:1, 50:20, 57:21,
62:12, 62:14, 64:19,
87:17, 96:5, 99:21,
99:22, 100:9, 100:11
readable [1] - 63:20
readily [1] - 63:20
reading [1] - 36:21
ready [3] - 101:4,
101:8, 101:13
reaffirmed [1] -
45:20
real [2] - 56:10,
75:15
real-time [1] - 75:15
really [7] - 4:19,
11:20, 14:7, 17:23,
66:25, 73:7, 73:12
reason [14] - 14:8,
18:9, 19:16, 31:22,
44:1, 44:8, 56:16,
56:17, 61:6, 62:12,
63:18, 67:13, 67:14,
95:22
reasons [5] - 18:10,
44:8, 44:21, 77:12,
101:1
Rebecca[1] - 61:9
recalled [1] - 37:8
recanted [1] - 89:24
recanting [1] - 89:21
receive [5] - 17:12,
17:14, 54:9, 75:21,
90:12
received [17] - 15:16,
15:22, 17:6, 19:17,
20:15, 23:8, 27:13,
30:14, 32:13, 34:11,
54:2, 54:10, 58:18,
58:21, 59:3, 74:21
receiving [5] - 16:25,
18:14, 18:18, 61:15,
63:13
recent [1] - 90:5
recently [3] - 11:14,
31:5, 34:11
recognition [1] -
86:9
recognize [2] - 47:8,
70:4
recognized [1] - 69:5
recollection [1] -
37:20
recommendations

[3] - 45:14, 59:6, 76:9
Reconvened^[1] - 1:3
record^[4] - 10:25, 45:3, 57:22, 97:9
recordings^[1] - 40:24
records^[12] - 24:19, 31:18, 32:1, 32:24, 38:20, 38:22, 38:25, 80:6, 85:4, 87:15, 93:12, 95:19
redacted^[2] - 17:1, 29:19
redaction^[1] - 83:3
redactions^[7] - 29:11, 62:8, 62:11, 62:17, 74:20, 82:13, 82:14
reduced^[1] - 13:23
redundant^[1] - 77:18
refer^[5] - 1:12, 17:25, 62:8, 88:8, 92:25
referable^[1] - 10:12
Reference^[1] - 87:24
reference^[25] - 8:10, 12:11, 15:18, 20:16, 24:11, 25:15, 29:19, 30:13, 34:13, 39:24, 40:4, 40:7, 40:10, 40:18, 40:21, 52:21, 78:11, 86:11, 86:13, 86:18, 88:21, 90:25, 95:9, 97:4
referenced^[1] - 33:20
references^[2] - 15:7, 25:25
referencing^[1] - 100:2
referred^[15] - 3:2, 4:1, 11:20, 15:19, 19:20, 20:1, 27:7, 48:17, 48:22, 49:4, 84:7, 85:25, 86:1, 86:24, 95:20
referring^[4] - 21:8, 24:3, 77:23, 96:1
refers^[2] - 2:24, 78:8
reflect^[2] - 51:15, 73:11
refused^[1] - 15:25
regard^[1] - 52:8
regarding^[4] - 11:18, 35:22, 61:16, 63:2
regards^[1] - 25:1
Registrar^[5] - 1:4, 33:24, 73:17, 73:20,

102:2
regret^[1] - 45:21
regrets^[1] - 1:9
reiterated^[1] - 51:11
relate^[3] - 32:24, 39:23, 96:11
related^[10] - 3:10, 24:5, 58:15, 78:13, 79:21, 86:7, 87:15, 88:15, 88:17, 100:3
relates^[2] - 11:14, 22:20
relating^[11] - 4:6, 11:5, 15:14, 29:2, 30:20, 39:1, 54:14, 63:3, 63:16, 90:12, 93:22
relation^[2] - 29:7, 41:23
relationship^[1] - 60:23
relatively^[2] - 17:21, 96:11
release^[1] - 61:16
relevance^[10] - 12:15, 41:24, 42:11, 50:25, 59:13, 76:3, 76:8, 80:7, 83:21, 88:2
relevant^[32] - 2:22, 9:3, 11:12, 11:23, 12:3, 12:24, 13:9, 14:25, 15:1, 15:11, 22:14, 22:17, 22:19, 27:3, 43:23, 48:20, 48:25, 64:13, 64:14, 79:6, 79:13, 79:17, 80:18, 82:17, 83:1, 83:19, 84:3, 86:14, 87:23, 90:1, 95:16, 100:12
rely^[1] - 91:20
relying^[1] - 54:7
remain^[1] - 39:23
remains^[2] - 3:24, 89:18
remark^[1] - 18:20
remarks^[1] - 83:24
remedy^[1] - 75:2
remember^[2] - 13:4, 59:23
remind^[1] - 63:10
removed^[3] - 74:20, 93:19, 93:24
rendered^[1] - 84:6
repeat^[1] - 55:11
repeated^[2] - 50:7, 51:21
repeatedly^[1] - 94:10

repetition^[1] - 5:9
repetitious^[1] - 5:10
replied^[1] - 55:15
reply^[12] - 47:2, 47:3, 47:21, 47:25, 48:1, 52:4, 57:14, 57:15, 70:25, 73:23, 99:1, 99:16
replying^[1] - 77:6
Report^[4] - 20:12, 34:9, 63:2, 63:18
report^[15] - 15:13, 20:13, 21:6, 25:12, 27:8, 30:5, 35:5, 36:11, 52:21, 58:22, 59:17, 61:16, 66:6, 87:20, 91:20
reported^[3] - 25:16, 37:4, 87:22
Reporter^[1] - 102:12
reporting^[1] - 36:23
Reporting^[1] - 102:13
reports^[1] - 64:1
reprehensible^[1] - 84:14
represented^[1] - 83:9
reproduced^[1] - 5:7
request^[32] - 6:1, 6:9, 10:10, 11:3, 12:13, 12:14, 23:16, 26:23, 27:6, 27:14, 27:24, 27:25, 28:1, 28:9, 28:24, 30:19, 31:16, 31:17, 32:16, 32:23, 38:11, 40:13, 41:18, 42:12, 79:14, 79:23, 79:24, 86:7, 88:23, 92:1, 92:17
requested^[10] - 7:5, 7:9, 7:24, 10:11, 17:15, 38:20, 38:22, 41:16, 44:7, 68:6
requesting^[1] - 90:15
Requests^[2] - 7:14, 7:19
requests^[23] - 5:15, 6:18, 6:19, 7:12, 10:9, 11:4, 12:17, 15:24, 23:6, 26:22, 26:25, 27:12, 28:22, 33:14, 40:14, 44:22, 46:15, 66:10, 66:11, 67:16, 78:9, 87:2, 88:2
require^[3] - 4:16, 4:25, 76:15
Required^[1] - 100:1
required^[5] - 5:19,

7:10, 13:16, 85:1, 99:22
requirement^[1] - 47:17
requires^[2] - 13:19, 14:20
requiring^[2] - 99:18, 100:11
research^[1] - 92:6
resembled^[1] - 84:19
reserve^[1] - 57:14
residence^[3] - 32:25, 33:18, 34:15
resources^[2] - 5:3, 14:2
respect^[46] - 18:23, 23:18, 25:10, 25:20, 27:2, 28:4, 28:9, 29:5, 30:18, 32:12, 32:15, 32:17, 32:22, 32:23, 33:5, 33:13, 34:13, 38:19, 39:3, 42:1, 42:17, 42:18, 44:3, 44:9, 46:8, 61:6, 63:21, 72:2, 76:12, 79:1, 79:10, 80:16, 82:1, 82:3, 82:10, 82:12, 82:16, 83:22, 85:21, 88:14, 90:4, 94:4, 94:18, 97:4, 97:24, 101:23
respected^[1] - 64:5
respectful^[5] - 27:15, 47:12, 50:3, 56:24, 76:2
respecting^[2] - 1:19, 85:2
respective^[1] - 82:20
respond^[7] - 50:13, 54:18, 55:12, 56:22, 57:6, 83:23, 97:24
responded^[2] - 39:3, 95:7
respondent^[1] - 48:2
responding^[2] - 81:1, 81:7
response^[14] - 10:7, 25:22, 26:19, 33:10, 33:11, 33:13, 33:15, 35:14, 39:9, 39:10, 61:20, 78:4, 87:2, 92:1
responsibility^[1] - 80:3
responsive^[2] - 7:12, 11:2
result^[1] - 92:6

Resumed^[1] - 73:19
resumed^[2] - 1:4, 73:20
retain^[1] - 1:24
retention^[1] - 1:20
returned^[1] - 94:21
reveals^[1] - 14:4
review^[7] - 3:16, 5:4, 20:10, 58:24, 80:6, 84:8, 96:19
Review^[1] - 20:21
reviewed^[7] - 3:17, 20:19, 22:4, 41:8, 59:18, 85:13, 89:19
reviewing^[2] - 11:17, 83:21
reviews^[1] - 3:2
Ridiculous^[1] - 20:18
right-hand^[1] - 93:17
rights^[1] - 39:18
risks^[1] - 59:15
road^[1] - 89:21
Robert^[2] - 58:12, 70:11
Roberts^[5] - 57:18, 57:23, 59:22, 60:2, 72:18
Robin^[3] - 33:21, 34:1, 54:8
Rock^[1] - 89:4
room^[6] - 49:12, 50:7, 54:13, 55:12, 70:7, 72:6
Rossmo^[3] - 42:22, 43:4, 47:4
Rossmo's^[2] - 47:6, 47:19
routinely^[1] - 7:3
rule^[1] - 54:18
rules^[4] - 1:19, 12:18, 46:14, 84:12
running^[1] - 68:18

S

Sarah^[10] - 1:14, 26:8, 28:6, 29:4, 30:22, 33:1, 38:14, 39:5, 46:6, 86:23
satisfied^[3] - 6:9, 32:17, 92:17
satisfy^[1] - 88:23
Saturday^[2] - 49:4, 54:10
save^[1] - 44:23
saw^[6] - 12:10, 19:4, 22:11, 64:12, 71:4, 89:25
scale^[1] - 12:13

<p>scheduled [2] - 58:2, 59:16</p> <p>scrutiny [1] - 14:21</p> <p>search [1] - 30:3</p> <p>searched [1] - 89:18</p> <p>searches [1] - 6:8</p> <p>season [1] - 63:22</p> <p>Sebastian [4] - 23:19, 23:25, 88:15, 88:18</p> <p>Sebastian's [1] - 24:18</p> <p>second [18] - 6:16, 28:24, 33:6, 35:3, 35:25, 36:8, 36:16, 45:2, 47:13, 74:11, 76:11, 78:8, 80:14, 92:23, 94:6, 94:16, 95:18</p> <p>Secondly [1] - 13:14</p> <p>section [1] - 95:15</p> <p>see [51] - 2:8, 2:11, 2:23, 3:13, 4:3, 5:21, 5:25, 6:14, 7:1, 7:3, 7:9, 7:14, 7:21, 7:22, 8:1, 8:3, 8:10, 8:13, 8:17, 10:10, 12:16, 16:21, 17:11, 18:11, 18:12, 20:3, 20:7, 20:13, 20:20, 26:9, 26:16, 26:17, 26:19, 28:7, 28:15, 30:11, 33:12, 41:24, 42:12, 48:19, 52:25, 53:25, 55:15, 61:25, 63:17, 65:4, 71:4, 71:9, 93:7, 93:8, 98:19</p> <p>seeing [2] - 64:4, 65:6</p> <p>seek [1] - 79:7</p> <p>seeking [7] - 15:1, 56:6, 81:12, 85:21, 88:11, 88:22, 93:12</p> <p>seeks [1] - 100:16</p> <p>seem [4] - 49:25, 65:8, 71:24, 73:3</p> <p>seemingly [1] - 89:5</p> <p>selection [1] - 3:17</p> <p>selections [2] - 16:4, 16:6</p> <p>sends [1] - 1:9</p> <p>senior [4] - 19:8, 61:12, 71:24, 72:18</p> <p>sense [5] - 38:7, 48:15, 68:12, 81:14, 101:13</p> <p>sensible [1] - 5:12</p> <p>sent [14] - 9:23, 10:8, 10:13, 12:12, 19:15, 29:14, 30:24, 67:10,</p>	<p>67:16, 95:3, 95:5, 96:7, 96:19, 96:24</p> <p>sentence [3] - 2:11, 3:14, 62:7</p> <p>September [2] - 24:17, 87:19</p> <p>Sergeant [12] - 29:1, 29:22, 29:24, 30:19, 30:20, 30:24, 35:20, 92:13, 92:14, 92:19, 93:13, 93:20</p> <p>serial [1] - 47:9</p> <p>series [2] - 9:10, 9:13</p> <p>serious [7] - 51:14, 52:8, 52:23, 53:7, 54:13, 55:9, 56:3</p> <p>serve [4] - 14:17, 68:19, 68:23, 76:18</p> <p>served [2] - 68:10, 68:24</p> <p>Service [1] - 102:13</p> <p>session [1] - 94:9</p> <p>set [18] - 2:9, 2:12, 3:9, 4:2, 5:11, 5:17, 6:12, 6:17, 12:18, 13:13, 26:3, 39:10, 41:22, 55:1, 68:11, 87:24, 94:6, 96:5</p> <p>sets [1] - 6:21</p> <p>several [1] - 61:13</p> <p>shake [1] - 74:1</p> <p>shaken [1] - 79:20</p> <p>share [3] - 47:24, 60:10, 60:15</p> <p>sheer [1] - 66:22</p> <p>sheet [2] - 32:7, 32:8</p> <p>sheets [1] - 32:6</p> <p>Shenher [2] - 31:18, 94:12</p> <p>Shenher's [1] - 32:17</p> <p>Shenhers [1] - 19:7</p> <p>show [1] - 70:14</p> <p>showed [1] - 69:15</p> <p>shown [1] - 43:2</p> <p>shows [1] - 28:11</p> <p>shred [1] - 5:17</p> <p>sides [2] - 73:3, 100:24</p> <p>sign [1] - 59:20</p> <p>significance [1] - 4:4</p> <p>significant [3] - 40:23, 76:19, 96:22</p> <p>signing [1] - 63:12</p> <p>similar [1] - 44:16</p> <p>similarly [1] - 3:23</p> <p>simple [4] - 43:5, 60:9, 64:22, 66:8</p> <p>simplest [4] - 42:25, 43:17, 43:18, 43:25</p>	<p>simply [8] - 10:25, 14:22, 42:25, 47:10, 60:20, 79:16, 80:12, 82:25</p> <p>single [2] - 5:17, 55:19</p> <p>sit [1] - 22:23</p> <p>sitting [1] - 13:9</p> <p>situation [2] - 4:10, 5:8</p> <p>six [1] - 77:3</p> <p>skill [1] - 102:9</p> <p>Skwarok [4] - 47:4, 47:20, 1:5</p> <p>slaughter [2] - 35:4, 35:17</p> <p>slaughterhouse [3] - 34:17, 37:10, 37:22</p> <p>slightest [1] - 22:7</p> <p>Smith [1] - 102:11</p> <p>smoking [1] - 74:3</p> <p>smooth [1] - 64:22</p> <p>solicitor [1] - 29:16</p> <p>solicitor-client [1] - 29:16</p> <p>someone [2] - 66:20, 98:22</p> <p>Sometimes [2] - 6:10, 92:3</p> <p>sometimes [5] - 6:8, 12:10, 52:11, 73:25, 92:2</p> <p>somewhat [3] - 18:19, 31:23, 95:10</p> <p>soon [3] - 1:23, 61:20, 61:22</p> <p>sore [1] - 96:12</p> <p>sorry [7] - 16:20, 19:18, 20:20, 26:7, 38:11, 49:22, 95:18</p> <p>sort [3] - 11:24, 13:19, 91:25</p> <p>sought [3] - 59:11, 80:12, 85:18</p> <p>source [1] - 88:8</p> <p>speaks [1] - 57:12</p> <p>Special [2] - 41:21, 42:7</p> <p>specific [23] - 4:16, 5:15, 8:17, 10:4, 10:24, 15:14, 21:22, 22:10, 22:13, 22:24, 23:6, 25:23, 27:7, 27:17, 28:9, 28:22, 38:11, 44:21, 55:2, 55:20, 80:12, 85:17</p> <p>specifically [7] - 4:5, 6:25, 18:4, 22:20, 57:14, 77:23, 87:2</p> <p>specificity [1] -</p>	<p>54:16</p> <p>spoken [1] - 75:4</p> <p>Staff [6] - 30:23, 92:13, 92:14, 92:19, 93:13, 93:20</p> <p>staff [6] - 60:25, 61:6, 62:14, 66:9, 91:6, 91:8</p> <p>stage [1] - 101:15</p> <p>stand [2] - 66:20, 85:11</p> <p>standard [1] - 76:3</p> <p>standing [1] - 34:18</p> <p>stapled [1] - 95:10</p> <p>start [9] - 77:22, 78:3, 101:3, 101:6, 101:8, 101:10, 101:11, 101:12, 101:25</p> <p>started [3] - 66:13, 66:16, 66:25</p> <p>state [5] - 10:18, 27:5, 48:23, 54:16, 94:2</p> <p>statement [3] - 13:3, 45:21, 50:14</p> <p>statements [12] - 37:24, 37:25, 38:2, 45:7, 48:20, 48:23, 49:3, 49:10, 49:14, 49:19, 50:10, 52:8</p> <p>states [2] - 26:4, 52:14</p> <p>stating [1] - 29:14</p> <p>status [4] - 9:16, 10:9, 26:22, 26:24</p> <p>stay [1] - 29:3</p> <p>stayed [1] - 67:16</p> <p>steaming [2] - 74:4, 75:17</p> <p>steps [3] - 12:2, 12:23, 46:7</p> <p>sticks [1] - 96:11</p> <p>still [8] - 38:12, 38:14, 58:20, 62:1, 67:2, 67:4, 86:13, 95:3</p> <p>stood [2] - 50:6, 50:8</p> <p>strict [1] - 86:20</p> <p>struck [1] - 14:16</p> <p>structural [2] - 74:13, 75:2</p> <p>studied [1] - 94:12</p> <p>subheading [1] - 87:15</p> <p>subject [5] - 11:5, 42:9, 44:25, 64:15, 66:1</p> <p>subjects [1] - 2:6</p> <p>submission [20] -</p>	<p>5:18, 11:19, 12:24, 17:23, 27:15, 30:16, 31:15, 32:16, 43:7, 43:14, 43:17, 44:5, 46:11, 47:4, 47:12, 47:16, 56:25, 76:2, 76:6, 98:25</p> <p>submissions [10] - 23:10, 23:17, 46:5, 46:19, 48:6, 48:17, 76:22, 85:11, 97:12, 97:19</p> <p>Submissions [9] - 1:3, 1:4, 1:5, 1:6, 1:7, 1:8, 1:9, 1:10, 1:11</p> <p>submit [2] - 46:3, 80:8</p> <p>submitted [2] - 58:17, 87:11</p> <p>subsequently [1] - 58:7</p> <p>subsumed [1] - 42:7</p> <p>sufficient [2] - 47:5, 47:17</p> <p>suggest [7] - 49:1, 77:12, 79:12, 83:12, 86:13, 94:3, 97:12</p> <p>suggested [5] - 51:9, 71:8, 80:20, 88:23, 97:7</p> <p>suggesting [4] - 67:13, 83:18, 89:15, 100:6</p> <p>suggestion [2] - 13:6, 66:25</p> <p>suitable [1] - 14:11</p> <p>suits [1] - 79:7</p> <p>summary [5] - 3:15, 3:20, 32:8, 88:7</p> <p>summons [16] - 44:13, 68:3, 68:10, 68:20, 68:23, 68:24, 77:16, 77:19, 77:24, 78:1, 78:4, 79:10, 84:2, 85:14, 99:17, 99:18</p> <p>summonses [2] - 44:9, 67:10</p> <p>supplementary [1] - 21:25</p> <p>Supplements [1] - 8:11</p> <p>support [5] - 19:13, 43:15, 45:16, 45:17, 58:12</p> <p>supported [2] - 43:18, 46:5</p> <p>suppression [3] - 50:1, 54:15</p> <p>Surely [1] - 64:2</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>surprise [1] - 90:12 surprised [1] - 15:16 surveillance [1] - 21:2 suspect [2] - 30:21, 71:13 suspects [1] - 63:6 sweeping [1] - 55:10 sworn [1] - 28:7 Sylvestri [4] - 32:24, 33:5, 33:9, 33:16 system [3] - 53:8, 70:5, 80:5</p>	<p>47:13, 47:19 they've [2] - 79:12, 92:7 They've [1] - 95:4 third [4] - 6:17, 30:18, 78:19, 81:16 Thompson[1] - 61:3 thorough [1] - 100:25 thoughts [1] - 47:22 thousands [3] - 17:5, 22:4, 73:6 three [6] - 16:6, 24:22, 30:12, 41:11, 53:3, 89:17 throughout [2] - 6:4, 88:8 thumb [1] - 96:12 tied [3] - 50:1, 51:5, 52:2 Tiffany[1] - 10:2 Tim[2] - 1:8, 48:4 timely [2] - 47:8, 64:7 tips [5] - 32:3, 32:5, 32:7, 32:12, 32:19 tirelessly [1] - 61:7 title [1] - 95:25 Tobias[38] - 1:5, 1:12, 7:19, 7:21, 8:3, 10:1, 16:13, 16:19, 16:23, 16:25, 18:3, 20:9, 23:5, 24:4, 43:20, 44:10, 45:8, 45:14, 46:6, 48:16, 61:10, 62:5, 62:20, 62:21, 64:9, 85:25, 86:25, 87:6, 97:21, 98:6, 98:8, 98:12, 99:3, 99:10, 1:3, 1:10 Tobias's [1] - 48:6 today [2] - 4:18, 86:2 together [4] - 3:16, 4:11, 51:5, 68:2 tomorrow [3] - 101:2, 101:12, 102:3 took [13] - 2:17, 6:10, 14:3, 15:7, 18:16, 19:19, 33:21, 34:10, 34:13, 55:18, 60:17, 65:2, 99:17 top [5] - 5:11, 8:10, 67:16, 70:3, 93:17 topic [2] - 33:17, 93:16 Total[2] - 8:4, 8:5 totally [4] - 47:24, 56:10, 73:8, 101:8 touched [1] - 81:17 track [1] - 65:11</p>	<p>tracking [1] - 70:5 tragic [1] - 45:24 transcribed [1] - 102:8 transcript [7] - 16:4, 16:9, 16:13, 17:25, 21:4, 102:7 transcripts [1] - 40:19 transparency [1] - 46:4 transparent [1] - 46:2 treated [1] - 10:23 trees [2] - 74:2, 79:20 trial [3] - 13:8, 13:17, 64:2 trials [1] - 60:11 tribulations [1] - 60:12 trickle [1] - 79:4 tried [1] - 13:13 trouble [1] - 72:25 troubled [2] - 51:16, 51:20 troubling [2] - 13:5, 92:11 true [2] - 79:15, 102:7 trust [1] - 70:6 truth [1] - 13:11 try [4] - 38:5, 52:17, 81:17, 101:21 turn [17] - 7:15, 8:9, 9:9, 9:21, 10:5, 15:5, 27:1, 27:17, 28:11, 33:22, 35:5, 39:6, 69:19, 77:19, 86:4, 86:22, 93:15 turned [2] - 38:13, 38:15 twice [2] - 14:8, 14:14 two [18] - 15:14, 18:14, 24:13, 25:5, 25:6, 25:8, 25:18, 25:20, 40:6, 40:13, 44:8, 44:21, 68:14, 76:5, 78:2, 90:4, 92:11 type [2] - 10:25, 25:19 types [1] - 89:6</p>	<p>33:6, 39:12, 87:14 undercover [1] - 41:6 undergo [1] - 6:8 underpinning [1] - 57:1 undertaken [3] - 5:2, 32:4, 73:14 unfold [1] - 71:25 unforgivable [1] - 52:15 unfortunate [4] - 70:2, 71:11, 87:25, 97:18 unfortunately [1] - 90:24 unidentified [3] - 3:24, 89:14, 89:15 Unit [5] - 8:11, 31:2, 31:20, 41:21, 42:7 Unit's [1] - 31:2 United [1] - 102:13 Unless [1] - 57:8 unlikely [1] - 58:5 unnecessary [2] - 59:8, 77:12 unreasonable [2] - 98:11, 98:13 unredacted [2] - 29:8, 29:18 unrelated [2] - 11:17, 11:21 unsatisfactory [1] - 82:24 unseen [1] - 67:8 Unsolved[2] - 31:1, 31:2 unsubstantiated [1] - 56:11 unsuccessful [1] - 84:16 unsworn [1] - 54:7 untrue [1] - 88:24 unusual [1] - 90:14 up [38] - 2:9, 7:15, 9:9, 16:3, 32:11, 33:22, 34:15, 38:13, 38:15, 39:6, 43:8, 49:5, 49:23, 49:25, 50:6, 50:8, 51:9, 51:20, 53:6, 53:10, 53:15, 54:14, 55:23, 56:2, 56:11, 59:10, 66:6, 66:10, 70:24, 71:20, 81:9, 92:24, 95:9, 96:8, 97:25, 98:22, 98:25 update [2] - 26:24, 33:13 updates [1] - 9:15</p>	<p>upload [1] - 75:22 uploaded [7] - 66:14, 74:21, 75:1, 75:15, 75:17, 75:21, 93:25 ups [1] - 53:2 upset [1] - 73:3 upstanding [1] - 43:11 upwards [1] - 41:11 urging [2] - 19:21, 19:22 useful [2] - 19:25, 76:4</p>
T				V
<p>tab [10] - 7:17, 26:14, 34:4, 34:7, 53:22, 55:13, 55:14, 69:14, 69:19, 77:23 Tab[3] - 26:15, 34:6, 69:16 table [2] - 34:19, 83:1 talks [1] - 82:20 tangential [1] - 87:5 targeted [2] - 5:15, 28:21 Task[1] - 34:9 task [5] - 35:5, 42:8, 59:5, 79:25, 85:3 tasking [1] - 32:8 tax [1] - 52:25 taxpayers' [1] - 52:16 team [2] - 8:16, 14:16 teams [2] - 3:22, 14:22 tendered [1] - 47:11 tens [1] - 17:5 tenure [1] - 31:19 terms [19] - 5:1, 17:2, 25:15, 29:21, 39:24, 40:4, 40:7, 40:9, 40:18, 40:21, 71:14, 76:16, 78:11, 86:11, 86:13, 86:18, 86:20, 88:21, 97:4 Terms[1] - 87:24 testimony [3] - 29:23, 30:24, 40:11 that...then [1] - 55:6 themselves [1] - 31:13 theories [1] - 43:7 Therefore[1] - 61:19 therefore [2] - 67:25, 77:17 thesis [3] - 47:6,</p>	<p>tab [10] - 7:17, 26:14, 34:4, 34:7, 53:22, 55:13, 55:14, 69:14, 69:19, 77:23 Tab[3] - 26:15, 34:6, 69:16 table [2] - 34:19, 83:1 talks [1] - 82:20 tangential [1] - 87:5 targeted [2] - 5:15, 28:21 Task[1] - 34:9 task [5] - 35:5, 42:8, 59:5, 79:25, 85:3 tasking [1] - 32:8 tax [1] - 52:25 taxpayers' [1] - 52:16 team [2] - 8:16, 14:16 teams [2] - 3:22, 14:22 tendered [1] - 47:11 tens [1] - 17:5 tenure [1] - 31:19 terms [19] - 5:1, 17:2, 25:15, 29:21, 39:24, 40:4, 40:7, 40:9, 40:18, 40:21, 71:14, 76:16, 78:11, 86:11, 86:13, 86:18, 86:20, 88:21, 97:4 Terms[1] - 87:24 testimony [3] - 29:23, 30:24, 40:11 that...then [1] - 55:6 themselves [1] - 31:13 theories [1] - 43:7 Therefore[1] - 61:19 therefore [2] - 67:25, 77:17 thesis [3] - 47:6,</p>	<p>tracking [1] - 70:5 tragic [1] - 45:24 transcribed [1] - 102:8 transcript [7] - 16:4, 16:9, 16:13, 17:25, 21:4, 102:7 transcripts [1] - 40:19 transparency [1] - 46:4 transparent [1] - 46:2 treated [1] - 10:23 trees [2] - 74:2, 79:20 trial [3] - 13:8, 13:17, 64:2 trials [1] - 60:11 tribulations [1] - 60:12 trickle [1] - 79:4 tried [1] - 13:13 trouble [1] - 72:25 troubled [2] - 51:16, 51:20 troubling [2] - 13:5, 92:11 true [2] - 79:15, 102:7 trust [1] - 70:6 truth [1] - 13:11 try [4] - 38:5, 52:17, 81:17, 101:21 turn [17] - 7:15, 8:9, 9:9, 9:21, 10:5, 15:5, 27:1, 27:17, 28:11, 33:22, 35:5, 39:6, 69:19, 77:19, 86:4, 86:22, 93:15 turned [2] - 38:13, 38:15 twice [2] - 14:8, 14:14 two [18] - 15:14, 18:14, 24:13, 25:5, 25:6, 25:8, 25:18, 25:20, 40:6, 40:13, 44:8, 44:21, 68:14, 76:5, 78:2, 90:4, 92:11 type [2] - 10:25, 25:19 types [1] - 89:6</p>	<p>33:6, 39:12, 87:14 undercover [1] - 41:6 undergo [1] - 6:8 underpinning [1] - 57:1 undertaken [3] - 5:2, 32:4, 73:14 unfold [1] - 71:25 unforgivable [1] - 52:15 unfortunate [4] - 70:2, 71:11, 87:25, 97:18 unfortunately [1] - 90:24 unidentified [3] - 3:24, 89:14, 89:15 Unit [5] - 8:11, 31:2, 31:20, 41:21, 42:7 Unit's [1] - 31:2 United [1] - 102:13 Unless [1] - 57:8 unlikely [1] - 58:5 unnecessary [2] - 59:8, 77:12 unreasonable [2] - 98:11, 98:13 unredacted [2] - 29:8, 29:18 unrelated [2] - 11:17, 11:21 unsatisfactory [1] - 82:24 unseen [1] - 67:8 Unsolved[2] - 31:1, 31:2 unsubstantiated [1] - 56:11 unsuccessful [1] - 84:16 unsworn [1] - 54:7 untrue [1] - 88:24 unusual [1] - 90:14 up [38] - 2:9, 7:15, 9:9, 16:3, 32:11, 33:22, 34:15, 38:13, 38:15, 39:6, 43:8, 49:5, 49:23, 49:25, 50:6, 50:8, 51:9, 51:20, 53:6, 53:10, 53:15, 54:14, 55:23, 56:2, 56:11, 59:10, 66:6, 66:10, 70:24, 71:20, 81:9, 92:24, 95:9, 96:8, 97:25, 98:22, 98:25 update [2] - 26:24, 33:13 updates [1] - 9:15</p>	<p>valid [1] - 71:12 Valley[1] - 20:10 value [1] - 67:1 Van[1] - 93:15 Vancouver[16] - 1:1, 1:8, 32:1, 47:15, 64:21, 66:2, 68:25, 74:8, 77:9, 77:14, 77:25, 79:1, 80:15, 80:16, 98:4, 98:9 Vancouver's [1] - 100:4 various [3] - 1:19, 9:19, 19:14 vast [1] - 44:2 vastly [2] - 14:13, 16:2 Verbal[1] - 57:25 verse [1] - 4:18 versions [1] - 74:19 Vertlieb[23] - 47:21, 47:24, 57:11, 57:17, 57:23, 60:5, 69:19, 69:22, 69:25, 70:2, 70:20, 71:3, 71:11, 72:4, 72:9, 72:13, 81:3, 81:5, 90:22, 91:5, 97:6, 101:3, 1:7 Vertlieb's [1] - 57:15 vett[4] - 14:5, 40:24, 41:5, 41:12 vetting [5] - 5:1, 6:7, 14:7, 41:9, 64:16 victims [1] - 45:23 video [3] - 40:17, 40:23, 41:4 videos [1] - 41:11 videotape [1] - 40:25 videotapes [1] - 40:15 view [5] - 50:3, 52:20, 59:7, 72:13, 92:16 visible [1] - 21:15</p>
U				
		U		
		<p>unincorrupted [1] - 24:17 under [5] - 3:17, 8:4,</p>		

<p>visit [1] - 33:17 volume [2] - 19:23, 66:22 voluminous [3] - 4:10, 67:4, 75:6 Vong[3] - 35:1, 35:2, 36:1 Vong's [1] - 37:19 Vpd[2] - 48:4, 99:18</p>	<p>whitewashes [1] - 53:2 who've [1] - 61:2 whole [4] - 13:15, 21:25, 50:19, 55:22 wide [2] - 86:1, 86:7 willingness [1] - 74:7 Winteringham [5] - 101:4, 101:7, 101:12, 101:17, 101:19 wish [7] - 5:25, 27:6, 29:15, 81:16, 99:23, 101:3, 101:6 wished [1] - 10:16 wishes [2] - 6:5, 49:19 withdraw [1] - 49:19 withheld [6] - 15:10, 15:12, 19:12, 19:24, 22:9, 59:10 Witness [1] - 8:14 witness [5] - 21:16, 21:17, 45:2, 67:9, 89:23 witnesses [8] - 4:8, 8:17, 8:19, 58:19, 58:20, 66:19, 83:5, 91:17 woman [1] - 89:9 women [10] - 4:7, 25:5, 25:10, 53:11, 53:16, 61:17, 78:13, 85:3, 86:12, 100:3 women's [2] - 25:20, 47:10 wondering [1] - 47:21 word [4] - 48:10, 64:11, 65:5, 97:23 wording [1] - 100:7 words [5] - 46:3, 57:9, 65:19, 84:4, 94:1 workload [1] - 11:15 works [1] - 80:5 world [1] - 50:20 worthwhile [1] - 74:9 writer [1] - 59:20 writing [3] - 13:24, 60:20, 63:25 written [9] - 5:13, 25:22, 26:19, 33:3, 49:18, 58:23, 64:7, 66:2, 101:1 wrote [7] - 50:18, 52:9, 62:6, 64:8, 66:3, 66:4, 74:17</p>	<p>Y</p>
<p>W</p>	<p>years [3] - 63:4, 92:4, 96:20 yesterday [31] - 1:12, 2:1, 12:5, 12:8, 13:5, 13:18, 23:10, 27:22, 28:7, 33:20, 34:10, 48:6, 48:16, 55:18, 66:12, 70:13, 71:16, 80:24, 81:21, 82:6, 84:8, 88:16, 89:13, 90:6, 92:12, 92:21, 93:5, 94:6, 94:18, 94:22, 95:17 Yesterday [1] - 85:25 young [1] - 71:22 yourself [1] - 45:13</p>	<p>Z</p>
<p>Wait[3] - 51:23, 98:20 wait [1] - 12:16 waiting [1] - 13:10 waived [1] - 74:18 Walker [1] - 35:21 wants [2] - 48:1, 48:3 Ward[32] - 18:3, 19:10, 19:19, 26:25, 28:25, 33:15, 38:20, 42:17, 42:23, 43:3, 44:7, 44:23, 49:2, 49:9, 49:18, 50:4, 50:6, 50:10, 50:15, 50:18, 51:1, 51:9, 51:16, 52:9, 56:15, 58:1, 58:6, 68:22, 76:15, 78:5, 94:1 Wards [9] - 10:9, 26:21, 27:18, 43:7, 48:17, 48:19, 51:6, 73:1, 75:19 warns [1] - 43:13 warrant [1] - 30:3 ways [1] - 14:7 wearing [2] - 34:19, 37:13 website [1] - 50:20 Wednesday [1] - 20:6 weekend [2] - 64:14, 90:20 weekly [1] - 79:4 weeks [2] - 41:11, 91:17 welcome [1] - 49:19 whatsoever [3] - 50:9, 54:24, 56:5 wherein [1] - 83:3 Whitehead [6] - 33:21, 34:1, 53:18, 54:8, 69:17, 77:20 Whitehead's [1] - 95:17 whitewash [3] - 43:8, 53:6, 55:23 whitewashed [2] - 53:10, 53:15</p>	<p>Zaporozan [1] - 94:7 zero [1] - 41:2</p>	<p>XV</p>