

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**LARRY PHILIP FONTAINE *et al.***

Plaintiffs

- and -

**THE ATTORNEY GENERAL OF CANADA *et al.***

Defendants

Proceedings under the *Class Proceedings Act*, 1992, S.O. 1992 C.6

---

**REQUEST FOR DIRECTIONS**

---

Mushkegowuk Council  
As per Edmund Metatawabin,  
Elder and Former Chief of Fort Albany First Nation  
and Executive member of Peetabeck Keway  
Keykaywin Association

Box 370  
Moose Factory, ON P0L 1W0

Tel: 705-278-1108  
Email: [edmund@edmundmetatawabin.com](mailto:edmund@edmundmetatawabin.com)

**TO: STOCKWOODS LLP**  
TD North Tower  
77 King Street West, Suite 4130, P.O. Box 140  
Toronto-Dominion Centre  
Toronto, Ontario M5K 1H1

Tel: 416-593-7200  
Fax: 416-593-9345

**Brian Gover**  
Lawyer for the Administrative Judge on the IRS Settlement Agreement

**AND TO: CHIEF ADJUDICATOR, DAN SHAPIRO**  
Indian Residential Schools Adjudication Secretariat  
2010 - 12th AVE, 9th floor  
Regina, SK S4P 0M3

Tel: 306-502-3528  
Fax: 306-790-4635

**AND TO: GOWLINGS**  
2600-160 Elgin Street  
Ottawa, Ontario K1P 1C3

Tel: 613-233-1781  
Fax: 613-563-9869

**Pierre Champagne**  
Lawyers for Les Soeurs de la Charité d'Ottawa, a Catholic entity that operated St. Anne's IRS

**AND TO: DEPARTMENT OF JUSTICE**  
Prairie Region  
300 EPCOR Tower, 10423 -101 Street  
Edmonton, Alberta T5H 0E7

Tel: 780-495-2975  
Fax: 780-495-2964

**Catherine A. Coughlan and Brent Thompson**  
Lawyers for the Attorney General of Canada

*Copy of Request for Directions will be also copied*

**TO: ASSEMBLY OF FIRST NATIONS**  
55 Metcalfe Street, Suite 1600  
Ottawa, Ontario K1P 6L5

Tel: 613-241-6789  
Fax: 613-241-5808

**Stuart Wuttke**  
Lawyers for the Assembly of First Nations

**AND TO: FALCONERS LLP**  
Barristers-at-law  
10 Alcorn Avenue, Suite 204  
Toronto, Ontario M4V 3A9

Tel: 416-964-0495  
Fax: 416-929-8179

**Julian N. Falconer**  
Lawyers for the Truth and Reconciliation Commission

**AND TO: PETER GRANT & ASSOCIATES**  
900-777 Hornby Street  
Vancouver, British Columbia V6Z 1S4

Tel: 604-685-1229  
Fax: 604-685-0244

**Peter Grant**  
Chair – National Administration Committee

# INDEX

---

## INDEX

---

**Tab 1:** Request For Directions (pages 1-9)

**Tab 2:** Affidavit of Edmund Metatawabin sworn August 26, 2013 (pages 10-20)

### **EXHIBITS TO THE AFFIDAVIT OF EDMUND METATAWABIN**

**Exhibit A:** Report of the Testimonial/Panel Component dated August 20, 1992 (pages 21-29)

**Exhibit B:** Summary Report of the 1992 Reunion and Keykaywin Conference (pages 30-46)

**Exhibit C:** Letter to Ed Metatawabin from Ernie T. Sutherland dated February 27, 1997 (pages 47-53)

**Exhibit D:** Will-say statement of Detective Constable Delguidice (pages 54-80)

**Exhibit E:** 1923 translation of the Catholic Church catechism book used by Sauvages des Postes d'Albany, Severn, Martin's Falls (pages 81-86)

**TAB 3:** Affidavit of Edmund Metatawabin sworn February 29, 2016 (pages 87-100)

**TAB 4:** Affidavit of Deputy Grand Chief Rebecca Friday sworn February 24, 2016 (pages 101-109)

### **EXHIBITS TO THE AFFIDAVIT OF DEPUTY GRAND CHIEF REBECCA FRIDAY**

**Exhibit A:** Resolution of Mushkegowuk Council dated October 22, 2015 (pages 110-114)

**Exhibit B:** Statement of Mary-Jane Wabano re: ideas for mental health support (pages 115-116)

# TAB 1

ONTARIO  
SUPERIOR COURT OF JUSTICE

LARRY PHILIP FONTAINE in his personal capacity and in his capacity as the Executor of the estate of Agnes Mary Fontaine, deceased, MICHELLINE AMMAQ, PERCY ARCHIE, CHARLES BAXTER SR., ELIJAH BAXTER, EVELYN BAXTER, DONALD BELCOURT, NORA BERNARD, JOHN BOSUM, JANET BREWSTER, RHONDA BUFFALO, ERNESTINE CAIBAIOSAI-GIDMARK, MICHAEL CARPAN, BRENDA CYR, DEANNA CYR, MALCOLM DAWSON, ANN DENE, BENNY DOCTOR, LUCY DOCTOR, JAMES FONTAINE in his personal capacity and in his capacity as the Executor of the Estate of Agnes Mary Fontaine, deceased, VINCENT BRADLEY FONTAINE, DANA EVA MARIE FRANCEY, PEGGY GOOD, FRED KELLY, ROSEMARIE KUPTANA, ELIZABETH KUSIAK, THERESA LAROCQUE, JANE McCULLUM, CORNELIUS McCOMBER, VERONICA MARTEN, STANLEY THOMAS NEPETAYPO, FLORA NORTHWEST, NORMAN PAUCHEY, CAMBLE QUATELL, ALVIN BARNEY SAULTEAUX, CHRISTINE SEMPLE, DENNIS SMOKEYDAY, KENNETH SPARVIER, EDWARD TAPIATIC, HELEN WINDERMAN and ADRIAN YELLOWKNEE

Plaintiffs

- and -

THE ATTORNEY GENERAL OF CANADA, THE PRESBYTERIAN CHURCH IN CANADA, THE GENERAL SYNOD OF THE ANGLICAN CHURCH OF CANADA, THE UNITED CHURCH OF CANADA, THE BOARD OF HOME MISSIONS OF THE UNITED CHURCH OF CANADA, THE WOMEN'S MISSIONARY SOCIETY OF THE PRESBYTERIAN CHURCH, THE BAPTIST CHURCH IN CANADA, BOARD OF HOME MISSIONS AND SOCIAL SERVICES OF THE PRESBYTERIAN CHURCH IN BAY, THE CANADA IMPACT NORTH MINISTRIES OF THE COMPANY FOR THE PROPAGATION OF THE GOSPEL IN NEW ENGLAND (also known as THE NEW ENGLAND COMPANY), THE DIOCESE OF SASKATCHEWAN, THE DIOCESE OF THE SYNOD OF CARIBOO, THE FOREIGN MISSION OF THE PRESBYTERIAN CHURCH IN CANADA, THE INCORPORATED SYNOD OF THE DIOCESE OF HURON, THE METHODIST CHURCH OF CANADA, THE MISSIONARY SOCIETY OF THE ANGLICAN CHURCH OF CANADA, THE MISSIONARY SOCIETY OF THE METHODIST CHURCH OF CANADA (ALSO KNOWN AS THE METHODIST MISSIONARY SOCIETY OF CANADA), THE INCORPORATED SYNOD OF THE DIOCESE OF ALGOMA, THE SYNOD OF THE ANGLICAN CHURCH OF THE DIOCESE OF QUEBEC, THE SYNOD OF THE DIOCESE OF ATHBASCA, THE SYNOD OF THE DIOCESE OF BRANDON, THE ANGLICAN SYNOD OF THE DIOCESE OF BRITISH COLUMBIA, THE SYNOD OF THE DIOCESE OF CALGARY, THE SYNOD OF THE DIOCESE OF KEEWATIN, THE SYNOD OF THE DIOCESE OF QU'APPELLE, THE SYNOD OF THE DIOCESE OF NEW WESTMINSTER, THE SYNOD OF THE DIOCESE OF YUKON, THE TRUSTEE BOARD OF THE PRESBYTERIAN CHURCH IN CANADA, THE BOARD OF HOME MISSIONS AND SOCIAL SERVICE OF THE PRESBYTERIAN CHURCH OF CANADA, THE WOMEN'S MISSIONARY SOCIETY OF THE UNITED CHURCH OF CANADA, SISTERS OF CHARITY, A BODY CORPORATE ALSO KNOWN AS SISTERS OF CHARITY OF ST. VINCENT DE PAUL, HALIFAX, ALSO KNOWN AS SISTERS OF CHARITY HALIFAX, ROMAN CATHOLIC EPISCOPAL CORPORATION OF HALIFAX, LES SOEURS DE NOTRE DAME-AUXILIATRICE, LES SOEURS DE ST. FRANCOIS D'ASSISE, INSITUT DES SOEURS DU BON CONSEIL, LES SOEURS DE SAINT-JOSEPH DE SAINT-HYANCITHE, LES SOEURS DE JESUS-MARIE, LES SOEURS DE L'ASSOMPTION DE LA SAINTE VIERGE, LES SOEURS DE L'ASSOMPTION DE LA SAINT VIERGE DE L'ALBERTA, LES SOEURS DE LA CHARITE DE ST.-HYACINTHE, LES OEUVRES OBLATES DE L'ONTARIO, LES RESIDENCES OBLATES DU QUEBEC, LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE LA BAIE JAMES (THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF JAMES BAY), THE CATHOLIC DIOCESE OF MOOSONEE, SOEURS GRISES DE

MONTREAL/GREY NUNS OF MONTREAL, SISTERS OF CHARITY (GREY NUNS) OF ALBERTA, LES SOEURS DE LA CHARITE DES T.N.O., HOTEL-DIEU DE NICOLET, THE GREY NUNS OF MANITOBA INC.-LES SOEURS GRISES DU MANITOBA INC., LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE LA BAIE D'HUDSON – THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF HUDSON'S BAY, MISSIONARY OBLATES – GRANDIN PROVINCE, LES OBLATS DE MARIE IMMACULEE DU MANITOBA, THE ARCHIEPISCOPAL CORPORATION OF REGINA, THE SISTERS OF THE PRESENTATION, THE SISTERS OF ST. JOSEPH OF SAULT ST. MARIE, SISTERS OF CHARITY OF OTTAWA, OBLATES OF MARY IMMACULATE –ST. PETER'S PROVINCE, THE SISTERS OF SAINT ANN, SISTERS OF INSTRUCTION OF THE CHILD JESUS, THE BENEDICTINE SISTERS OF MT. ANGEL OREGON, LES PERES MONTFORTAINS, THE ROMAN CATHOLIC BISHOP OF KAMLOOPS CORPORATION SOLE, THE BISHOP OF VICTORIA, CORPORATION SOLE, THE ROMAN CATHOLIC BISHOP OF NELSON, CORPORATION SOLE, ORDER OF THE OBLATES OF MARY IMMACULATE IN THE PROVINCE OF BRITISH COLUMBIA, THE SISTERS OF CHARITY OF PROVIDENCE OF WESTERN CANADA, LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE GROUARD, ROMAN CATHOLIC EPISCOPAL CORPORATION OF KEEWATIN, LA CORPORATION ARCHIEPISCOPALE CATHOLIQUE ROMAINE DE ST. BONIFACE, LES MISSIONNAIRES OBLATES SISTERS DE ST. BONIFACE-THE MISSIONARY OBLATES SISTERS OF ST. BONIFACE, ROMAN CATHOLIC ARCHIEPISCOPAL CORPORATION OF WINNIPEG, LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE PRINCE ALBERT, THE ROMAN CATHOLIC BISHOP OF THUNDER BAY, IMMACULATE HEART COMMUNITY OF LOS ANGELES CA, ARCHDIOCESE OF VANCOUVER – THE ROMAN CATHOLIC ARCHBISHOP OF VANCOUVER, ROMAN CATHOLIC DIOCESE OF WHITEHORSE, THE CATHOLIC EPISCOPALE CORPORATION OF MACKENZIE-FORT SMITH, THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF PRINCE RUPERT, EPISCOPAL CORPORATION OF SASKATOON, OMI LACOMBE CANADA INC. and MT. ANGEL ABBEY INC.

---

### REQUEST FOR DIRECTION

---

#### **PARTY REQUESTING DIRECTION FOR A RE-HEARING, et.al.**

1. This Request for Direction (RFD) is being brought by Mushkegowuk Council on behalf of former students of St. Anne's IRS, and through Edmund Metatawabin, Elder and former Chief of Fort Albany First Nation, and executive member of Peetabeck Keway Keykaywin Association or St. Anne's Survivors Association ("PKKA").

#### **RELIEF REQUESTED**

2. Mushkegowuk Council seeks the following:
  - i) For Breach of the IRSSA from non-disclosure of the documents that were generated within the justice system, to prove the widespread sexual and physical abuse of children at St. Anne's IRS, to Order Canada to provide funding to PKKA in trust (or a charitable organization to be set up under PKKA), for aboriginal mental health support programs available to the survivors of St. Anne's IRS and their families, at \$300,000 per year for 3 years; Programs to include:



- (1) Elders Teaching House and outreach support positions; and
  - (2) Youth and Elders Camp; and
  - (3) Albany River Rafting for youth and elders.
- ii) That the Court provide directions for remedies that are needed, to ensure the IAP process respects the legal rights of, and provides justice to, each former student of St. Anne's IRS, based upon the proper documentary evidence of the abuse of children at that school, including the following:
- a) Suspend the release, under the IRSSA, to be given to the Federal Government and Catholic Church Entities that ran St. Anne's IRS until the following steps are done:
    - a. Appoint a short list of Adjudicators and competent IAP lawyers to handle all IAP claims for St. Anne's IAP Claimant's on the full documentary record; and
    - b. Each Adjudicator and approved lawyer will be given all the St. Anne's IRS documents plus Narrative and perpetrator reports and source documents; and
    - c. The approved lawyers will be reimbursed travel expenses to attend in communities or cities where former students reside, to provide independent legal advice, regardless of outcome; and
    - d. Have every IAP claim (already heard and not yet heard) from St. Anne's reviewed; and
    - e. Have notice given to each IAP Claimant that his/her rights to documentation was violated by the federal government and Catholic Church; and

- f. Each former student of St. Anne's IRS will be allowed up to \$2,500 plus HST to receive independent legal advice from an approved lawyer, upon which each former student will make an informed decision whether to seek a re-hearing; and
  - g. If a re-hearing is sought by the former student of St. Anne's, the Secretariat should set up a process to make an expedited application to the Judge for a re-hearing, to do so in writing only, with full confidentiality protection; and
- b) Extend the deadline date for filing an IAP claim arising out of St. Anne's IRS, to those people who gave a signed statement to the police but did not file an IAP claim; and
- a. Contact be made, with the assistance of PKKA, with every former student who provided a signed statement to the OPP in the 1990's (or the estates of anyone who died after May 2005) to advise him/her to seek legal counsel about a possible IAP claim. Provide \$2,500 plus HST to an approved lawyer to provide independent legal advice to that former student (or their estate); and
- c) Prohibit the involvement of Department of Justice lawyers and the current lawyers for the Catholic church entities that operated St. Anne's IRS, from all future St. Anne's IAP claims and direct the Attorney General of Canada appoint new lawyers to participate in the IAP hearings for all St. Anne's claims; or
- a. Compel the federal government lawyers and Catholic Church lawyers to be examined in public by the Court, as supervisor and enforcer of the IRSSA, as to why the documents arising from operations of the justice system since 1992 did not come forward into the IAP process.
  - b. Alternatively, to allow a class action against the Department of Justice lawyers and the lawyers for the Catholic entities that ran St. Anne's for

negligence, and deliberate interference with the IAP justice system;  
and

- d) Advance costs of \$50,000.00 to Mushkegowuk Council, including for disbursements incurred for Edmund Metatawabin to attend all public proceedings before the Court on this RFD, without prejudice to claim any further costs.
- e) Such further and other relief as this Honourable Court may deem just.

### **GROUND FOR THE REQUEST FOR DIRECTION**

- 3. Mushkegowuk Council is an elected governing body comprised of seven First Nations in northern Ontario.
- 4. Many First Nation Members of MC are survivors of St. Anne's IRS.
- 5. There was widespread sexual and physical abuse of aboriginal children forced to attend St. Anne's IRS under federal policy. The pain and suffering and dysfunction known to flow from severe and prolonged abuse is evident and continues to be evident in former students and their families and communities.
- 6. From 1992 until the IRSSA was signed, survivors of St. Anne's IRS exercised their legal rights and accessed the Ontario justice system, to prompt and operationalize proper government action to address the widespread abuse of children who were forced under Federal Government policy to attend St. Anne's IRS. Through the efforts and courage of former students, the abuse was documented and proven in numerous legal processes in the Ontario justice system ("12,300 documents proving abuse at St. Anne's IRS").
- 7. By 2003/2004, the lawyers in the Department of Justice and lawyers for the Catholic Church entities that operated St. Anne's obtained all the 12,300 documents proving abuse at St. Anne's IRS.

8. When the IRSSA was signed in 2006, the lawyers withheld from the IAP the 12,300 documents proving abuse at St. Anne's IRS, contrary to the terms of the IRSSA and without judicial authority to do so.
9. Mr. Justice Perell ordered production of and summaries for the 12,300 documents proving abuse at St. Anne's IRS by way of two Orders dated January 14, 2014 and June 23, 2015. Not until November 1, 2015 had the Defendants complied with the IRSSA for IAP claims arising out of St. Anne's IRS.
10. Had a truthful Narrative and the 12,300 documents proving abuse at St. Anne's IRS been available to the IRS Adjudication Secretariat when the IAP process was commenced in 2007, efforts should have been made by the Secretariat to ensure that former students of St. Anne's IRS (or his/her estate if deceased after May 2005) understood the IAP process for possible compensation, particularly if the former student had provided a signed statement to the Ontario Provincial Police outlining abuse that could be compensable.
11. Had a truthful Narrative and the 12,300 documents proving abuse at St. Anne's IRS been available to Health Canada, under Article 8 of the IRSSA, the high need for mental health support professionals, cultural support workers and related programs should have started in 2007 and been in full operation until now and into the future.
12. Had a truthful Narrative and POI reports and source documents been available and reviewed by IAP Adjudicators, some IAP Claimants would not have been denied compensation, or their compensations would have been increased.
13. Had a truthful Narrative and POI reports and source documents been available and reviewed by competent claimant lawyers, the need for legal representation of survivors of St. Anne's IRS would have become known.
14. Under facts known only to the IRS Adjudication Secretariat and the Defendants, hundreds or perhaps thousands of former students of St. Anne's IRS had their IAP claims denied or under compensated. Some were re-victimized by being found to be a liar, due to the hiding of the 12,300 documents proving abuse at St. Anne's IRS.

15. Health Canada mental health support programs that were to be provided under the IRSSA were offered only in cities, and were difficult/expensive/impossible for survivors to access.
16. Mushkegowuk Council and PKKA know what skills are needed in support workers and what types of cultural programs will help heal the individuals and communities hardest hit by the abuse at St. Anne's IRS. Mushkegowuk Council and PKKA need resources to provide meaningful support and treatment to the survivors of St. Anne's IRS, some of whom were re-victimized by the IAP process.
17. The program budget of Mushkegowuk Council was cut from \$1 million to \$500,000 in 2014/2015 by the Federal Government.
18. The leaders in the James Bay region should be entrusted with sufficient funds to expand and develop the programs.
19. Meanwhile, every St. Anne's IRS student whose rights have been violated and whose IAP claim has been affected (in whole or in part) should have access to justice and to competent legal counsel to represent them.
20. The lawyers in the Department of Justice and for the Catholic Church entities that operated St. Anne's IRS should not be allowed to attend the private and confidential hearings of the survivors of St. Anne's IRS.

**EVIDENCE TO BE RELIED UPON**

- a) Affidavit of Edmund Metatawabin sworn August 26, 2013
- b) Affidavit of Edmund Metatawabin sworn February 29, 2016
- c) Affidavit of Deputy Grand Chief Rebecca Friday sworn February 24, 2016
- d) Such further and other evidence as counsel may advise and this Honourable Court may deem appropriate.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 2<sup>nd</sup> day of March, 2016.

Mushkegowuk Council  
As per Edmund Metatawabin,  
Elder and Former Chief of Fort Albany First Nation; and  
Executive member of Peetabeck Keway Keykaywin  
Association

Box 370  
Moose Factory, ON P0L 1W0

Tel: 705-278-1108  
Email: edmund@edmundmetatawabin.com

**TO: STOCKWOODS LLP**  
TD North Tower  
77 King Street West, Suite 4130, P.O. Box 140  
Toronto-Dominion Centre  
Toronto, Ontario M5K 1H1

Tel: 416-593-7200  
Fax: 416-593-9345

**Brian Gover**  
Lawyer for the Administrative Judge on the IRS Settlement Agreement

**AND TO: CHIEF ADJUDICATOR, DAN SHAPIRO**  
Indian Residential Schools Adjudication Secretariat  
2010 - 12th AVE, 9th floor  
Regina, SK S4P 0M3

Tel: 306-502-3528  
Fax: 306-790-4635

**AND TO: GOWLINGS**  
2600-160 Elgin Street  
Ottawa, Ontario K1P 1C3

Tel: 613-233-1781  
Fax: 613-563-9869

**Pierre Champagne**  
Lawyers for Les Soeurs de la Charité d'Ottawa, a Catholic entity that operated St.  
Anne's IRS

**AND TO: DEPARTMENT OF JUSTICE**  
Prairie Region  
300 EPCOR Tower, 10423 -101 Street  
Edmonton, Alberta T5H 0E7

Tel: 780-495-2975

Fax: 780-495-2964

**Catherine A. Coughlan and Brent Thompson**  
Lawyers for the Attorney General of Canada

*Copy of Request for Directions will be also copied*

**TO: ASSEMBLY OF FIRST NATIONS**  
55 Metcalfe Street, Suite 1600  
Ottawa, Ontario K1P 6L5

Tel: 613-241-6789

Fax: 613-241-5808

**Stuart Wuttke**  
Lawyers for the Assembly of First Nations

**AND TO: FALCONERS LLP**  
Barristers-at-law  
10 Alcorn Avenue, Suite 204  
Toronto, Ontario M4V 3A9

Tel: 416-964-0495

Fax: 416-929-8179

**Julian N. Falconer**  
Lawyers for the Truth and Reconciliation Commission

**AND TO: PETER GRANT & ASSOCIATES**  
900-777 Hornby Street  
Vancouver, British Columbia V6Z 1S4

Tel: 604-685-1229

Fax: 604-685-0244

**Peter Grant**  
Chair – National Administration Committee

# TAB 2



Court File No. 00-CV-192059

*ONTARIO*  
SUPERIOR COURT OF JUSTICE

BETWEEN:

LARRY PHILIP FONTAINE in his personal capacity and in his capacity as the  
 Executor of the estate of Agnes Mary Fontaine, deceased, MICHELLINE AMMAQ,  
 PERCY ARCHIE, CHARLES BAXTER SR., ELIJAH BAXTER, EVELYN BAXTER,  
 DONALD BELCOURT, NORA BERNARD, JOHN BOSUM, JANET BREWSTER,  
 RHONDA BUFFALO, ERNESTINE CAIBAIOSAI-GIDMARK, MICHAEL  
 CARPAN, BRENDA CYR, DEANNA CYR, MALCOLM DAWSON, ANN DENE,  
 BENNY DOCTOR, LUCY DOCTOR, JAMES FONTAINE in his personal capacity  
 and in his capacity as the Executor of the Estate of Agnes Mary Fontaine, deceased,  
 VINCENT BRADLEY FONTAINE, DANA EVA MARIE FRANCEY, PEGGY  
 GOOD, FRED KELLY, ROSEMARIE KUPTANA, ELIZABETH KUSIAK,  
 THERESA LAROCQUE, JANE McCULLUM, CORNELIUS McCOMBER,  
 VERONICA MARTEN, STANLEY THOMAS NEPETAYPO, FLORA  
 NORTHWEST, NORMAN PAUCHEY, CAMBLE QUATELL, ALVIN BARNEY  
 SAULTEAUX, CHRISTINE SEMPLE, DENNIS SMOKEYDAY, KENNETH  
 SPARVIER, EDWARD TAPIATIC, HELEN WINDERMAN and ADRIAN  
 YELLOWKNEE

Plaintiffs

-and-

THE ATTORNEY GENERAL OF CANADA, THE PRESBYTERIAN CHURCH IN  
 CANADA, THE GENERAL SYNOD OF THE ANGLICAN CHURCH OF CANADA,  
 THE UNITED CHURCH OF CANADA, THE BOARD OF HOME MISSIONS OF  
 THE UNITED CHURCH OF CANADA, THE WOMEN'S MISSIONARY SOCIETY  
 OF THE PRESBYTERIAN CHURCH, THE BAPTIST CHURCH IN CANADA,  
 BOARD OF HOME MISSIONS AND SOCIAL SERVICES OF THE  
 PRESBYTERIAN CHURCH IN BAY, THE CANADA IMPACT NORTH  
 MINISTRIES OF THE COMPANY FOR THE PROPAGATION OF THE GOSPEL IN  
 NEW ENGLAND (also known as THE NEW ENGLAND COMPANY), THE DIOCESE  
 OF SASKATCHEWAN, THE DIOCESE OF THE SYNOD OF CARIBOO, THE  
 FOREIGN MISSION OF THE PRESBYTERIAN CHURCH IN CANADA, THE  
 INCORPORATED SYNOD OF THE DIOCESE OF HURON, THE METHODIST

CHURCH OF CANADA, THE MISSIONARY SOCIETY OF THE ANGLICAN CHURCH OF CANADA, THE MISSIONARY SOCIETY OF THE METHODIST CHURCH OF CANADA (ALSO KNOWN AS THE METHODIST MISSIONARY SOCIETY OF CANADA), THE INCORPORATED SYNOD OF THE DIOCESE OF ALGOMA, THE SYNOD OF THE ANGLICAN CHURCH OF THE DIOCESE OF QUEBEC, THE SYNOD OF THE DIOCESE OF ATHBASCA, THE SYNOD OF THE DIOCESE OF BRANDON, THE ANGLICAN SYNOD OF THE DIOCESE OF BRITISH COLUMBIA, THE SYNOD OF THE DIOCESE OF CALGARY, THE SYNOD OF THE DIOCESE OF KEEWATIN, THE SYNOD OF THE DIOCESE OF QU'APPELLE, THE SYNOD OF THE DIOCESE OF NEW WESTMINSTER, THE 2 SYNOD OF THE DIOCESE OF YUKON, THE TRUSTEE BOARD OF THE PRESBYTERIAN CHURCH IN CANADA, THE BOARD OF HOME MISSIONS AND SOCIAL SERVICE OF THE PRESBYTERIAN CHURCH OF CANADA, THE WOMEN'S MISSIONARY SOCIETY OF THE UNITED CHURCH OF CANADA, SISTERS OF CHARITY, A BODY CORPORATE ALSO KNOWN AS SISTERS OF CHARITY OF ST. VINCENT DE PAUL, HALIFAX, ALSO KNOWN AS SISTERS OF CHARITY HALIFAX, ROMAN CATHOLIC EPISCOPAL CORPORATION OF HALIFAX, LES SOEURS DE NOTRE DAME-AUXILIATRICE, LES SOEURS DE ST. FRANCOIS D'ASSISE, INSITUT DES SOEURS DU BON CONSEIL, LES SOEURS DE SAINT-JOSEPH DE SAINT-HYANCITHE, LES SOEURS DE JESUSMARIE, LES SOEURS DE L'ASSOMPTION DE LA SAINTE VIERGE, LES SOEURS DE L'ASSOMPTION DE LA SAINT VIERGE DE L'ALBERTA, LES SOEURS DE LA CHARITE DE ST.-HYACINTHE, LES OEUVRES OBLATES DE L'ONTARIO, LES RESIDENCES OBLATES DU QUEBEC, LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE LA BAIE JAMES (THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF JAMES BAY), THE CATHOLIC DIOCESE OF MOOSONEE, SOEURS GRISES DE MONTRÉAL/GREY NUNS OF MONTREAL, SISTERS OF CHARITY (GREY NUNS) OF ALBERTA, LES SOEURS DE LA CHARITÉ DES T.N.O., HOTEL-DIEU DE NICOLET, THE GREY NUNS OF MANITOBA INC.-LES SOEURS GRISES DU MANITOBA INC., LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE LA BAIE D'HUDSON - THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF HUDSON'S BAY, MISSIONARY OBLATES - GRANDIN PROVINCE, LES OBLATS DE MARIE IMMACULEE DU MANITOBA, THE ARCHIEPISCOPAL CORPORATION OF REGINA, THE SISTERS OF THE PRESENTATION, THE SISTERS OF ST. JOSEPH OF SAULT ST. MARIE, SISTERS OF CHARITY OF OTTAWA, OBLATES OF MARY IMMACULATE -ST. PETER'S PROVINCE, THE SISTERS OF SAINT ANN, SISTERS OF INSTRUCTION OF THE CHILD JESUS, THE BENEDICTINE SISTERS OF MT. ANGEL OREGON, LES PERES MONTFORTAINS, THE ROMAN CATHOLIC BISHOP OF KAMLOOPS

---

CORPORATION SOLE, THE BISHOP OF VICTORIA, CORPORATION SOLE, THE ROMAN CATHOLIC BISHOP OF NELSON, CORPORATION SOLE, ORDER OF THE OBLATES OF MARY IMMACULATE IN THE PROVINCE OF BRITISH COLUMBIA, THE SISTERS OF CHARITY OF PROVIDENCE OF WESTERN CANADA, LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE GROUARD, ROMAN CATHOLIC EPISCOPAL CORPORATION OF KEEWATIN, LA CORPORATION ARCHIEPISCOPALE CATHOLIQUE ROMAINE DE ST. BONIFACE, LES MISSIONNAIRES OBLATES SISTERS DE ST. BONIFACE-THE MISSIONARY OBLATES SISTERS OF ST. BONIFACE, ROMAN CATHOLIC ARCHIEPISCOPAL CORPORATION OF WINNIPEG, LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE PRINCE ALBERT, THE ROMAN CATHOLIC BISHOP OF THUNDER BAY, IMMACULATE HEART COMMUNITY OF LOS ANGELES CA, ARCHDIOCESE OF VANCOUVER – THE ROMAN CATHOLIC ARCHBISHOP OF VANCOUVER, ROMAN CATHOLIC DIOCESE OF WHITEHORSE, THE CATHOLIC EPISCOPALE CORPORATION OF MACKENZIEFORT SMITH, THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF PRINCE RUPERT, EPISCOPAL CORPORATION OF SASKATOON, OMI LACOMBE CANADA INC. and MT. ANGEL ABBEY INC.

Defendants

Proceedings under the *Class Proceedings Act*, 1992, S.O. 1992. C.6

---

**AFFIDAVIT OF EDMUND METATAWABIN SWORN AUGUST 26 , 2013**

---

I, Edmund Metatawabin, of the First Nation of Ft. Albany, in the province of Ontario, MAKE OATH AND SAY:

1. I was Chief of Ft. Albany First Nation from 1988 to 1996 and I was traditional Chief 1997 and 1998. I was born October 20, 1947. My father was a trapper and my mother raised 11 children in the bush. I still reside in Ft. Albany presently.
  2. I have almost completed a Masters Degree in Environmental Studies at York University in Toronto. Completion of the Masters was interrupted to become Chief at Ft. Albany when the residential school legacy was stirring and creating abusive behaviour in the
-

- 4 -

community. I was asked to get involved as I had studied the mental wellbeing of people as part of environmental studies program.

3. I attended St. Anne's IRS from 1956 to 1963. I shared the physical abuse that came out at the criminal trial against Anna Wesley. She was my supervisor. I remember that the first day that I attended at the school, she slapped me hard on the head. Anna Wesley's slap could knock a small boy off his feet, and that happened to me as I ended up 5 feet away, slammed into the wall when she hit me.
  4. There were too many hittings from her over the years to remember all the details. She would hurt many parts of the body. For instance, when she cut my hair, she would take the scissors and gouge the hair out of my head. It was done in anger. She would leave my head bleeding after she cut my hair, and the same for the other boys. If a boy smiled, he could get hit by her. If we whispered to each other, she would hit us. The physical abuse that we witnessed daily over many years from Anna Wesley is hard for anyone to comprehend. No one stopped her.
  5. Anna Wesley forced me to eat my own vomit twice. One time, I was sick with the flu and I vomitted into my porridge. She told me to go up to the dorm. I was in the dorm, sick for three days with the flu. On the fourth day, I went back with the other boys to the dining room. Then, Sister Anna brought out the 4 day old porridge and vomit and she stood over me and made me eat it. She was beyond disgusting in the way that she treated children. She was full of anger and meanness.
  6. I was also made to sit in the electric chair twice at St. Anne's. I was a little boy and I had to climb up into the chair because I was still small. My legs did not touch the ground. When the current went through me, my legs shot out straight in front of me and were shaking. The current went all through my body and I cannot describe how intense the pain was. I could not scream. At St. Anne's, if you were being beaten, you could not scream or cry or the punishment would keep up. It was terribly wrong that supervisors were electrocuting children with that home made electric chair.
- 
-

7. I had read in university various writings about survivors of the Holocaust. I took psychology courses. I read about brain washing, character transformation, oppression. I found I could relate to the difficulties I was experiencing and those around me in Ft. Albany. We always felt second class. There were academic studies and concepts surrounding what had happened to us in residential school and the state of unrest in our communities. We knew there was something wrong.
  8. Edward Koostachin from Ft. Severn (now deceased) was working with me through this period to ponder the state of our community. By that stage, I had heard of many people who had terrible internal pain about residential school.
  9. We organized a very large conference, given our small community. In 1992, we asked survivors of St. Anne's to return to the place of our hardship, namely the St. Anne's Residential School Building. The school building still stood in 1992. Approximately 400 people attended the conference in person while other communities kept pace with the discussions through Wawatay Cree Radio Network. We began with three days of cultural events, with a pow wow, sweat lodge and traditional healing orientation process. We wanted to prepare people mentally for the conference.
  10. The next three days was the Keykaywin conference itself with academic and professional speakers. Now shown to me and attached hereto as **Exhibit A** is the Report of the Testimonial/Panel Component dated August 20, 1992. Now shown to me and attached hereto as **Exhibit B** is the Summary Report prepared by Mary Anne Nakogee-Davis of the 1992 Reunion and Keykaywin Conference. At pages 13 to 15 is the agenda for the conference.
  11. As organizers, we invited the former supervisors of St. Anne's to attend the Keykaywin Conference, namely the Oblates of Mary Immaculate and the Grey Nuns of Montreal. None of the former supervisors attended. Since they were part of the residential school, and it was an open conference, they had a right to be there and be witness to the testimonies at the conference.
- 
-

12. The newly appointed Bishop of the Catholic Diocese of Moosonee, Vincent Cadieux, attended the Keykaywin Conference. The Mother Superior from Sudbury also attended.
  13. The funding agencies for the Keykaywin Conference included Health Canada.
  14. As outlined in the two reports, many people came forward and provided testimonials to a panel of six people. A justice of the peace from Cochrane was on the panel. 19 men and 11 women provided their stories in the first two days and the panel presented on the third day. The entire report was read to the assembly and broadcast live on Wawatay Radio. The Bishop heard the outcome. The Bishop received copies of these reports. He also made statements in the conference that he was very hurt by what he was hearing.
  15. We had a Council meeting thereafter. My Council instructed me that due to the criminal nature of the contents of the panel report, I was to take that forward to the police to conduct an investigation. The Ontario Provincial Police, based in South Porcupine, were the police authority for our region. They were policing our community.
  16. I presented the report to the OPP at the Band office. I reported on the conference and the outcome of the panel report. I gave the names of people to the police who had indicated to me that they had been abused and were willing to share their story with the police. The people who testified to the panel were the first group of names given. Due to the public nature of the Conference through the Wawatay Radio, I was also receiving many communications from others in the region about having suffered abuse at St. Anne's as children. Many people asked me to pass on their information to the police.
  17. In my capacity as Chief, the people respected my ability to pass information to the police about their experiences. People did not have the confidence or belief in their own presence to call the police to tell their stories. I became their sponsor, asking the police to contact them and hear their story. The police were clearly authority figures which many former students of St. Anne's would still fear. It was finally possible to tell the reasons for their pain, because one Chief was willing to talk about the past abuse, and bring it to the attention of the police. Past attempts to tell their stories, often in the context of being criminally charged, had rebounded against many people. The police
-

- 7 -

might tell the Church and the church authorities were barriers to the stories coming out. The reason for the Conference and the OPP investigation was to provide a protective manner for the abuse to be disclosed.

18. That was the beginning of the OPP investigation. I eventually met Constable Greg Delguidice, who was the lead investigator of the special investigation that took about 5 years to complete. I also communicated with Diana Fuller, the Crown Attorney from Sudbury who was lead counsel representing the survivors who would be testifying.
  19. Health Canada eventually started a program for residential school survivors. The Conference had recommended a Commission of Inquiry into St. Anne's Residential School Syndrome, the electric chair and other elements, but nothing was ever established.
  20. In early 1997, Mushkegowuk Council gave authority to Peetabeck Keway Keykaywin (St. Anne's Residential School Survivors) Association (PKKA). I was President of PKKA. Now shown to me and attached hereto as **Exhibit C** is a letter dated February 27, 1997, which outlines the motion providing authority in that regard. The regional Chiefs gave PKKA the authority to represent St. Anne's residential school survivors. That continues until today.
  21. PKKA personnel were providing counseling to individuals who had to testify in the preliminary hearings and trials that happened until about 2000. The communities were kept informed through Wawatay Radio.
  22. Next, the Federal Government, the Catholic Church and Ontario Government invited survivors to participate in a pilot ADR project for reconciliation and resolution of the complicated matrix of the impact of this abuse on individuals and communities. PKKA agreed to participate in the Pilot ADR project based upon the guidance and advice of the Elders that we should meet with the two levels of government and the church to resolve this conflict and support the individuals who had been abused. It was part of the healing process we had identified at Keykaywin Conference.
-

23. I was one of the negotiators and we were ably assisted by legal counsel, Roger Tucker. I sat across from representatives of the Federal Government and Catholic Church and their respective lawyers. We had 100 survivors that we represented. The objective was to financially compensate those people. After a number of years, the Federal Government and Catholic Church said that only 30 people qualified for financial payments under the terms they were prepared to admit liability. We took that to the Board and the Board rejected that offer in approximately 2003. Throughout those negotiations, the Federal Government and Catholic Church were fully aware of the OPP investigation and the charges/preliminary inquiries and trials that had happened. The pilot project failed because there was no good faith offer. Even people who had suffered extreme abuse and harm were offered nothing.
  24. Thereafter, I was asked to participate in a Federal Government working caucus on residential schools across Canada. The working caucus formulated and organized and established guidelines for the adjudication process. I was sure that everyone involved knew about the OPP investigation and criminal trials.
  25. When the national class action law suit was settled and remaining claims moved into the IAP process, I thought that the evidence proven to that point about the abuse at St. Anne's would be known to the adjudicators and available to individuals in their private hearings. I have been assisting various individuals with their IAP claim applications and providing interpretation services to lawyers who do not speak Cree.
  26. In that context, I met Fay Brunning and Suzanne Desrosiers who were attending in the First Nations along the James Bay Coast in 2012 to meet people who wanted help with their IAP claims. We were trying to get knowledgeable lawyers to attend and help people in our communities as it is too expensive for most people to fly out, and these are not stories to be shared over the telephone.
  27. In or about May, 2013, Fay Brunning advised me that in IAP claims, there was no mention of the OPP investigation or criminal proceedings in the Federal Government disclosure about St. Anne's. She provided me with a copy of the will-say statement of
-



- 9 -

Detective Constable Delguidice in Cochrane, which is now shown to me and attached hereto as **Exhibit D**. I read that will-say statement and it certainly accurate to me.

28. I found it unbelievable that the Federal Government had hidden all proven abuse and documentation. Each person was being isolated in their hearings, in front of authority figures, being asked to tell their story yet again and again, from the beginning. There is no context in which the story is being heard by an adjudicator if none of the proven abuse is known to the adjudicator. The two authority figures, the Federal Government and Catholic Church, appear to be working together again to suppress the same people who were abused as children at St. Anne's.
  29. The Catholic Church still calls our stories "allegations". These are not allegations for us, they are the truth. The use of that term is against the spirit and principle of reconciliation.
  30. Now shown to me and attached hereto as **Exhibit E** is the 1923 translation of the Catholic Church catechism book for use by the "Sauvages des Postes d'Albany, Severn, Martin's Falls, etc." In that book, there is written evidence that the children were taught they would be paying homage to the devil if anyone participated "in shaking tent ceremonies, evil chanting, evil pipe ceremonies and sweetgrass". My grandparents, parents and myself were all taught that within St. Anne's.
  31. This non-disclosure is very serious to the St. Anne's survivors and all the people who have done so much since 1992 to address the widespread abuse of children at that residential school. The non-disclosure is an affront to:
    - (a) All the work that was done at the 1992 Keykaywin Conference,
    - (b) the OPP investigation and Crown Attorney work in the criminal charges and trials,
    - (c) the work by PKKA, Mushkegowuk Council, and all the political organizations who have been involved over the past 21 years
    - (d) the deliberations of the Elders over at least the past 21 years
    - (e) the individual legal rights of the persons who were individually abused
- 
-

32. The non-disclosure gives an unfair advantage to the Federal Government and church in the IAP process and fails to have them admit liability if the survivor's story is consistent with all that is known and proven about this school. The almost 1000 statements given by survivors to the police were done with no promise of money. The objective was to seek justice for criminal acts done to children by those mandated to protect Canadians.
  33. The non-disclosure goes against the spirit of reconciliation. The Truth and Reconciliation Commission and the historians should have access to all this evidence.
  34. The Board of the PKKA has requested that the Court be asked to review why this evidence was withheld from the IAP process, and to identify who gave these instructions. We want to know who made the decision to withhold a 20 year effort to prove the abuse to the Federal Government and the Catholic Church, and to seek support for the former students of St. Anne's IRS. For 20 years, we have engaged in a course of respectful, remedial conduct, within our legal rights as Canadians. The individual suffering of the former students has collectively whole communities to suffer dysfunction. We have been trying to help individuals and communities heal and move forward. This is a set back, in the view of PKKA.
  35. If we are to make a break with the past, those responsible for such wrongful conduct must be brought before the law to answer for their actions.
  36. The costs of having to bring forward this non-disclosure should be borne entirely by the Defendants in the class action law suit. This continues to place more burden on our region, to have to fund legal proceedings with scarce resources. The IAP process is placing a heavy burden on our institutions and organizations and people, because there are so many claims arising from St. Anne's but the Federal Government is not paying additional funds for the extra work that has to be done. The Hospitals, mental health clinics, healing resources, are all stretched because the IAP deadline created an artificial deadline for people to confront their past abuse, and tell their stories. There are not enough trained healers or counsellors to address the needs arising in the communities.
- 
-

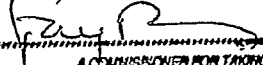
37. This serious non-disclosure has given rise to fresh feelings of rejection. People feel rejected and isolated again by the Canadian legal system as well as the Federal Government.
38. I am not being paid for my work and the additional efforts needed to address this additional wrongdoing and to ensure that all IAP claimants from St. Anne's are not left alone to prove to each adjudicator what has already been proven over and over during the past 20 years. There has been a miscarriage of justice if any one survivor has had his/her claim denied as a result of this non-disclosure about St. Anne's to adjudicators in the IAP process.
39. PKKA requests that the Court will ask for an independent, qualified person to review the St. Anne's cases to date for possible miscarriage in this regard.
40. I swear this affidavit to provide evidence to the Ontario Superior Court of Justice, for the IAP process, relating to the Ontario Provincial Police special investigation into sexual and physical abuse of children who attended at St. Anne's Indian Residential School and the resulting criminal charges/trials and convictions of former supervisors.

SWORNBEFORE ME at Ft. Albany, in  
the province of Ontario, on August 26  
, 2013.

  
\_\_\_\_\_  
*Commissioner for Taking Affidavits*

  
\_\_\_\_\_  
Edmund Metatawabin

This is Exhibit A .....  
affidavit of EDMUND METATAWASIN  
sworn before me, this 26th .....  
day of AUGUST ..... 2013 .....

  
.....  
A COMMISSIONER FOR TAKING AFFIDAVITS

**ST. ANNE'S RESIDENTIAL SCHOOL  
REUNION AND CONFERENCE**

**REPORT OF THE TESTIMONIAL/PANEL  
COMPONENT**

**FORT ALBANY FIRST NATION  
AUGUST 20, 1992**

---

**TABLE OF CONTENTS**

I INTRODUCTION

II MEMBERSHIP

III SUMMARY

IV RECOMMENDATIONS

1. SHORT TERM

2. LONG TERM

- 1 -

## I INTRODUCTION

1. Terms of Reference
  - a) Hearing and Recording the testimonials of Selected applicants.
  - b) Being aware of the term "Residential School Syndrome".
  - c) Provide a Summary Report of the Testimonials to the Chief and Council of the Fort Albany First Nation.
  - d) Provide recommendations to the Fort Albany Chief and Council.
  - e) Keep all information confidential.
  - f) Ability to discuss the contents of the hearings and provide a future-oriented view to facilitate the healing of "past inmates" to provide positive environment for the newer generations.

## II MEMBERSHIP

The names of the panel members are as follows:

1. Mr. Andrew Wesley, Chairperson; Executive Director, Kuuwanimano Child and Family Services, Timmins, Ontario
2. Ms. Barbara Montgomery, Co-Chairperson; Director, Alemotaeta, James Bay Community Mental Health Program, Moosenee
3. Mr. James Carpenter, Elder, Kashechewan First Nation.
4. Ms. Theresa Hall, Justice of the Peace, Cochrane Court.
5. Mr. Alex Spence, Moose Factory First Nation.
6. Mr. James Morris, Deputy Grand Chief, Nishnawbe-Aski Nation, Thunder Bay Ontario.

### III SUMMARY

It should be noted, from the general information presented at the conference, that the purpose of the co-operative approach exercised by the Federal government and the churches in operating the Residential Schools was to assimilate the First Nations children into mainstream Canadian society and to Christianize them.

The church that operated St. Anne's Residential School maintains that, given the socio-economic condition of the First Nations at the time, the Residential Schools served a useful purpose; however, they acknowledge that, like any other system, the Residential School had its negative aspects.

The Panel members agree that good was served by the Residential School and that many people were helped. There were many good Priests, Brothers and Nuns who genuinely cared for their charges; however, the main concern of the Panel lies with those many children for whom the system went horribly wrong and who, as adults, are still suffering the negative effects of the Residential School syndrome.

For those children for whom the system went wrong, the picture was frighteningly similar:

- 1) They entered the Residential School as innocent children. As one person stated "We were like little flowers, but because of the Residential School, the flowers never fully blossomed."
- 2) The children were abused. They were abused physically, sexually, emotionally, mentally and spiritually.
- 3) In the aftermath, the effects of the abuse caused them to lose their spirit; they were unable to love or could not function sexually in the proper way, their marriages broke down, they physically abused their own children, they had low self-esteem, they hated themselves, they thought they were dirty, they sought refuge in alcohol and drugs, they attempted suicide, while some of their former classmates committed suicide.
- 4) After many years of suffering alone, some of the people interviewed have begun the journey to healing, but it is still a long and difficult road. For the people who disclosed abuse to the Panel at this conference, this was a very important step, taken after much anguish and doubt, and it is the first step to healing; however, some of the people who were interviewed



..  
speak of many others who are not ready to come in.

The Panel heard testimony from 30 individuals: 19 men and 11 women. They ranged in age from the mid-thirties to Elders.

Of the 19 men who gave testimony, 10 were sexually abused. Almost all of them were physically abused in other ways; spiritually abused, humiliated, strapped, hit with rulers, hair pulled and dragged by the hair, stabbed with a pencil, made to eat their vomit, etc, etc.

Of the 11 women who gave testimony, 2 were sexually abused. Almost all of them were physically abused in a variety of ways, including strapping, being made to sit in the electric chair, being made to eat their vomit, being made to kneel on concrete floors, locked away in dark basements, being wrongly punished for things they did not do, etc, etc.

What follows now are a few of the incidents which were related by the people who gave testimony to illustrate the type of physical and sexual abuse they suffered.

Several people talked about three boys who ran away from St. Anne's Residential School and never came back. To this day, it is not certain what happened to the boys. It was related that bones were unearthed by the old barn and sent to Ottawa for analysis, but no report ever came back.

Boys were lined up outside and sent into a room one at a time where their pants were pulled down, and their genitals were fondled, looking for disorders.

Boys were made to masturbate while they were watched.

One of the boys was sexually abused where the penis penetrated his anus. He was abused by another person. The abuse did not stop for a long time. He almost became an abuser himself.

Several men related how they were made to wear plastic skirts while they took showers and were sometimes fondled while they were in that state. The person watching them played the part of a voyeur.

A woman relates how she arrived at the school with three brothers and two sisters. Because she was the oldest and their parents had separated, she felt

---

- 4 -

responsible for the children. She could not understand why they were separated. She kept asking for one of his brothers for whom she was particularly concerned. Six months after their arrival, she was awakened by a person dressed in white with her head covered who told her that her brother had died. She went with the person who took her to a room where she was raped by two men, who gagged her and tied her down. At dawn, she was discovered not being in her room and was strapped 20 times as punishment. She was told if she said anything about it again, she would be strapped 40 times. After four months, she discovered something funny about her stomach and was told she was going to have a baby. Three months after that, they took the baby away. She was taken to a room under the hospital. She does not know what they did with the baby. At that time, she hated the baby, but on this trip, the woman went to the room under the old hospital and said a prayer for the lost baby.

Several people talked about the electric chair that was used in the girls playroom. It seems odd how an electric chair can find its way into a Residential School; however, it seems to have been brought to the school for fun. Nevertheless, all the people who remembered the electric chair do not remember it in fun, but with pain and horror.

Several people described the incidents of throwing up into their porridge and then being made to eat their own vomit.

The straps are described as being red in colour and about an inch thick, and another strap that had metal rivets or nuts and bolts on it.

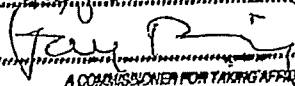
## IV RECOMMENDATIONS

## SHORT TERM

1. The case of the three missing boys needs to be investigated and dealt with immediately in the following manner:
  - a) The three run-away boys and the bones that were found near the old barn needs to be investigated to determine if there is a connection between the two. Is it fact or is it a rumour?
  - b) The psychological impact on the families of the three run-away boys, who were never found and never given proper burials needs to be redressed.
  - c) A memorial gathering should be given for the three families of the lost boys, and all their relatives, to finally deal with their loss.  
Compensation should be provided to the families by providing financial assistance for the memorial or any costs associated with putting the bones to their final resting place.
2. All the individuals who gave testimony and disclosed physical, psychological, sexual or spiritual abuse need immediate attention. It was a profound and painful event for the victims to come forward and required much courage on their part. They must not be let down now. They must receive on-going counselling and healing to be determined before they leave the community.
3. The case of the electric chair needs to be clarified. While it appeared to have started as a toy, it was eventually used to terrorize the children, to the extent of fainting and memory loss.

## LONG TERM

4. An independent Commission of Inquiry should be set up to look into the St. Anne's Residential School syndrome.
    - a) The people who gave testimony spoke of friends and other people who are not ready to disclose, they spoke of many other boys and girls who were physically and sexually abused and girls who were raped.
    - b) The Commission of Inquiry must have a process for the disclosure by other individuals who were physically and sexually abused.
    - c) The Commission of Inquiry must have a counselling and healing component to provide immediate attention to any victims who disclose at the hearings.
    - d) The leadership for the Commission should be a mix of Elders, former Residential School students who want to heal and any high profile figures who may wish to participate.
    - e) Compensation for the victims.
  5. The role of the Federal Government and the Roman Catholic Church in the fates of the victims of abuse needs to be addressed, without rest. As a start, they could be asked to finance the Commission of Inquiry; however, the Commission should begin with or without the support of the Federal government or the church.
  6. In the aftermath of the Residential School experience, many of the survivors went on to experience difficulty in providing proper parenting for their children, often passing the syndrome onto the next generation. To counter the effects of this syndrome, counselling services to provide training in parenting skills should be set up in every community where former students reside.
  7. The Panel noted that the people who have made the most progress in their own healing processes are those who adopted their own beliefs, including those who went back to their traditional beliefs and practices.
-

This is Exhibit B .....  
affidavit of EDMUND Metatawabn  
sworn before me, this 26<sup>th</sup> .....  
day of August 2013 .....  
  
A COMMISSIONER FOR TAKING AFFIDAVITS

St. Ann's Residential School  
1992 Reunion and Keykaywin Conference

# Summary Report

April 21, 1994

prepared by  
Mary Anne Nakogee-Davis, Coordinator



## Table of contents

Introduction . . . . .	2
Objectives . . . . .	4
General Evaluation of the Conference . . . . .	5
Panel Hearings . . . . .	6
Healing Circles . . . . .	9
Speakers . . . . .	10
Workshops . . . . .	12
Summary of Activities . . . . .	13

## Introduction

In August 1992, after many months of planning, a conference was held in Fort Albany to discuss St. Ann's Residential School and its impact on its ex-residents and their communities. The theme of the conference was Keykaywin or the Path to Healing.

Almost 400 people attended including many ex-residents as well as members of their families. In addition, representatives from political and religious organizations took part in the conference.

This report is designed to provide its readers with an overview of the conference itself as well as basic information about the reasons it was necessary to hold the conference. In addition, it provides a summary of the recommendations and hopes that arose from the conference.

Fort Albany is an remote Cree village on the western shore of James Bay in Northern Ontario. It has a population of approximately 1200 people, a high proportion of whom are children and youth. The community has little economic activity and many residents rely on social assistance. Most people live on reserve and are part of the Fort Albany First Nation whose Chief and Council are the local government. The First Nation is part of the Mushkegowuk Council which includes representatives from the other area communities: Peawanuck, Attawapiskat, Kashechewan, Moose Factory and New Post.

From 1905, Fort Albany was the site of a residential school that was operated for the federal government by the Oblates of Mary Immaculate, a Catholic order of priests and brothers. Most of the teachers at the school were Oblates or members of the Sisters of Charity (Grey Nuns). The school provided accommodation and schooling for several generations of Native children, mainly from the James Bay area. It closed in 1975.

Over the years, many persons have expressed concerns about things that happened at St. Ann's. Former students stated that they and others had been the victims of physical, mental, spiritual and sexual abuse. They began to realize that this abuse had shaped their adult lives and had prevented them from becoming whole persons. They feared that what they began to call the "St. Ann's Residential School Syndrome" had affected their relationships with their own children to the extent that the syndrome was "passed on" to their offspring. They needed a great deal of healing. For some, this came from accepting their own traditional ways and beliefs.

The Fort Albany First Nation decided to explore what could be done to help the ex-residents of St. Ann's. The Chief and Council held a "mini-conference" in February 1992 which included a great deal of participation by community elders. Elders hold a special place in Native society. Everyone respects them for the teachings, counselling and advice they can provide.



At the mini-conference, Fort Albany's Chief Edmund Metatawabin stated that the elders were being asked to give their permission for the holding of a conference. After hearing from a number of victims of abuse, the elders replied that it would help the victims if the conference was held. They also felt that it was important that the children of the community attend the conference. They emphasized the need for the ex-residents and their children to not only learn what had happened to them, but also for them to recover their own traditions.

One elder said that the conference was not to put blame on the church and school but to learn about the abuse that had taken place and to take care of the needs of the victims. Another stated that he realized that social diseases in the community could be traced back to what had happened at St. Ann's. Several elders recalled their own experiences at the school. They acknowledged their gratitude to the church for the education they had received. At the same time, they noted its negative impact on their culture and their family life. Several noted how younger people had lost their language and their traditions through attendance at residential school. Elders also commented on how younger people lacked knowledge of how to work in intimate relationships.

Planning began for a major conference that would bring together many ex-students, their families, former staff as well as Native traditional healers and other resource people. A coordinator was hired and various government, business and church organizations were asked to contribute towards the cost of the conference.

In addition to financial contributions, many people volunteered their time and the use of their homes and equipment. Security, kitchen and shower facilities as well as local transportation were largely donated by members of the Fort Albany community.

The conference would not have been possible without the work of many people. To them a great deal of gratitude is owed for taking part in a very stressful event. Whether they worked as translators, technicians, workshop leaders, sacred fire tenders, office staff, drivers, healing circle leaders, speakers, security officers, panel members or counsellors they all made a major contribution.

The contributions of the entire community to the conference cannot be exaggerated. To present a program for 400 people in a small and remote village is simply not possible without the wholehearted cooperation of the entire community and its leaders.

The Keykaywin conference was an intense experience for its participants. It included many activities and this report provides only an outline of what happened there. The organizers hope that coming to Keykaywin helped many of the ex-students of St. Ann's to move further along their personal roads to recovery. For some, attending made them realize, for the first time, the extent of the problems they faced as a result of the years they or their parents had spent in the residential school.

## Objectives

The residential school conference was held to meet many objectives, including:

- 1 To bring all ex-residents together at the original site of the St. Ann's Residential School System;
- 2 To better understand the background of St. Ann's and why its students were placed in an institutionalized and demoralizing system and to determine how we can ensure that something like this will never happen again;
- 3 To facilitate the healing process by providing an opportunity for the ex-residents to visit the site, vocalize their feelings and meet with other ex-residents and staff;
- 4 To encourage through the conference, the putting into words of the feelings, dreams and trauma that each participant had at some time during her or his life and to help provide insight in present emotional problems;
- 5 Through the testimonial component, to enable the participants to come to grips with the past by remembering it as it really happened with the help of others. This will help to end the isolation suffered by the victims and will be a key factor in recovery;
- 6 To provide forums for testimonials that will inform the public and generate understanding on the effects of the residential school system on the socialization of the ex-residents;
- 7 To provide an opportunity, through discussions and presentations, to complete the circle for many people and to help them start thinking forward;
- 8 To build understanding of different types of abuse (women, elders, children, sexual) and their effects on the social adjustments of individuals;
- 9 To develop proposals for a better mental, health and education system resulting from past experiences.

## General Evaluation of the Conference

There are various sources of evaluation for the conference. These include the comments made at its conclusion by several speakers including Justice of the Peace Theresa Hall. She said that no healing would have started without the opportunity the conference gave for people to speak about what had happened to them. She recognized that the road to healing is a long and difficult one and asked people to pray. Theresa asked them to pray not only for the victims and their families but also for the government and the church so that they might be given guidance "to walk with us in the healing process, only then can we become one family under the guidance of the Great Spirit".

Grand Chief Bentley Cheechoo of the Nishnawbe-Aski Nation, himself a residential school survivor, told the conference that he knew their pain, that no one could be forgiven until they acknowledged the harm they had done and that he accepted the recommendations given by the panel. The Grand Chief said that he would like to work with the victims, the Native community, the church and the government to put the recommendations into place.

During several of the healing circles, participants discussed the conference. They said that it had helped them and they saw it as the place where they had started their healing but that they needed support in the future for their healing to continue.

The Keykaywin conference was definitely successful in that it provided an opportunity for a large number of ex-residents and their families to meet together in an atmosphere of trust where they could discuss what had happened to them and begin to heal. It will take years before a final evaluation can be done because the process of healing is not a short one.

One source of regret for many at the conference was the fact that none of the former staff of the residential school attended. The organizers had invited several of them in the hope that they could participate in the conference and begin their own healing.

## Panel Hearings

A six person panel was created to hear the testimonials of ex-residents. The panel consisted of:

Andrew Wesley, *Panel Chairperson, Executive Director, Kunuwanimano Child and Family Services, Timmins;*

Barbara Montgomery, *Panel Co-Chairperson, Director, Alemotaeta: James Bay Community Mental Health Program, Moosonee;*

James Carpenter, *Elder, Kashechewan First Nation;*

Theresa Hall, *Justice of the Peace, Cochrane;*

Alex Spence, *Moose Factory First Nation;*

James Morris, *Deputy Grand Chief, Nishnawbe-Aski Nation.*

The panel members served under the following terms of reference:

- 1 Hear and record the testimonials of selected ex-residents;
- 2 To become aware of the Residential School Syndrome;
- 3 To provide a summary report of the testimonials to the Chief and Council of the Fort Albany First Nation;
- 4 Provide recommendations to the Fort Albany Chief and Council;
- 5 Keep all information confidential;
- 6 Maintain an ability to discuss the contents of the hearings and provide a forward looking view to facilitate the healing of the ex-residents in order to build a positive environment for future generations.

The panel prepared a summary report based on the thirty testimonials that were heard. These were from 19 men and 11 women. Ten of the men had been sexually abused as had two of the women. The abuse included being forced to masturbate while being watched, being the victim of anal intercourse, being fondled in genital areas and being raped. One woman told the panel of becoming pregnant after being raped in the school and, ultimately, having her baby taken away.

Keykaywin Conference 1992 Report

---

Almost everyone had been physically abused, humiliated and spiritually abused. Some of the physical abuses described included being stabbed with a pencil, made to eat vomit, forced to kneel for hours on concrete floors, being locked in dark basements, being punished for things not done, being dragged by the hair and being subjected to electrical shocks in an "electric chair".

Several of the ex-residents spoke movingly of three boys who ran away from the school and who never came back.

Four counsellors were available to help people after they gave their testimonies. This facility was extremely important. People who testify about their abuse often feel that they are extremely vulnerable and fragile afterwards and must have support available.

The panel concluded that:

"...the purpose of the co-operative approach exercised by the Federal government and the churches in operating the residential schools was to assimilate the First Nations children into mainstream Canadian society and to Christianise them."

"The church that operated St. Ann's Residential School maintains that, given the socio-economic condition of the First Nations at the time, the residential schools served a useful purpose; however, they acknowledge that, like any other system, the residential school had its negative aspects."

"The panel members agree that good was served by the residential school and that many people were helped. There were many good priests, brothers and nuns who genuinely cared for their charges; however, the main concern of the panel lies with those many children for whom the system went horribly wrong and who, as adults, are still suffering the negative effects of the residential school."

The panel made the following recommendations:

#### Short term

- 1 The case of the three missing boys needs to be investigated and dealt with immediately;
- 2 All of the individuals who testified and disclosed abuse need immediate attention.
- 3 The case of the electric chair needs to be clarified. While it appeared to have started as a toy, it was eventually used to terrorize the children, to the extent of causing fainting and memory loss.

## Long term

- 1 An independent commission of inquiry should be set up to look into the St. Ann's Residential School Syndrome. Many of the testifiers spoke of others who had been abused but were not yet ready to disclose. The commission must have a counselling and healing component and should be lead by a mix of elders, former students and political leaders;
- 2 There needs to be compensation for the victims;
- 3 The role of the government and the church needs to be addressed, without rest. As a start, they could be asked to finance the commission of inquiry. However, the commission should begin with or without their support;
- 4 Counselling services to provide training in parenting skills should be set up in every community where former students now reside. Many of the survivors recounted their difficulties in caring for their children and believed that they had passed the syndrome on to the next generation;
- 5 Finally, the panel noted that the people who had made the greatest process in their own healing were those who had adopted their own beliefs, including those who returned to traditional beliefs and practices.

## Healing Circles

Many of the ex-residents attended a healing circle each evening at the conference and during the pow wow that preceded it. These were held to assist them with their healing. To make sure that everyone had a comfortable place to go, different circles were held for men, women, youth and elders as well as mixed circles. The circles lasted for periods of five to eight hours. They were held in rooms in the school as well as in homes.

Healing circles provide a form of group therapy. In the group, each member benefits from the experiences of each of the others. People in a group who have already begun their own healing can give a lot of help to everyone there. This is particularly true with elders.

Each circle has a leader who is responsible for opening the circle with a prayer, explaining what will take place and ensuring that everyone has a chance to speak. An eagle feather is passed around the circle from one speaker to the next. While a person holds the feather, no one else may speak.

One feature of a healing circle is its freedom from destructive criticism. People are free to make their disclosure without fear of negative comments. In addition, the circle leader does not attempt to force participants into speaking about matters until they are ready to speak about them.

Ex-residents spoke of their experiences at St. Ann's. For most, this was very painful. The circles provided a safe place for the disclosure of abuse and its aftermaths. Many participants spoke of the problems they had experienced since attending the school. These commonly included a lack of self-esteem, alcoholism, domestic violence, marriage break down and a lack of parenting skills. Often, ex-residents felt their children were victims of the residential school due to the ex-students' problems as parents and spouses.

## Speakers

The conference was privileged to have addresses by a variety of political and professional individuals as well as ex-residents. For many of the speakers, appearing before the conference was tantamount to making public disclosure of their own abuse in the school. The courage that they displayed in doing this will never be forgotten by anyone who was present.

One of the keynote speakers was Dr. Brian Titley of the University of Lethbridge who spoke about "The Church and Indian Residential Schooling". His talk covered the whole residential school system that was set up by the federal government and the churches and traced its development from the earliest days until the system was shut down. He included quotations from various church officials which showed their attitudes towards Native people and their way of life. Fundamentally, they admitted "unapologetically that the Oblate mandate included trying 'to change attitudes and practices which impede the acquisition of Christian virtues.'"<sup>1</sup> He concluded by stating, "It was clear that neither Church nor State was prepared to deal honestly and openly with this problem. There was to be no question of responsibility, or of compensation -- however that might have been devised. Both bodies were primarily interested on continuing to pose as defenders of native rights and to counteract what Father Blanchette described as 'excessive media attention.'"<sup>2</sup>

Nishnawbe-Aski Deputy Grand Chief Jim Morris spoke about the possible connections between suicide and the residential schools. He also recalled a friend from his own days in a residential school, a boy who died from exposure after he ran away. Today, his family believes that the boy had been a victim of abuse. The Deputy Grand Chief emphasized the need for both disclosure and for a support system for those who disclose.

The then newly appointed Bishop of the Catholic Diocese of Moosonee, Vincent Cadieux, told the conference, "It is troubling and painful to hear these stories. At times I would have preferred not to have heard these. But I know that it is better for those who bear scars to reopen them and let the poison out so that the wound may be healed, even though this experience may hurt or be painful." He noted that the people of the First Nations had rich traditional values and that the church needed "to learn to respect these values which are sacred to your peoples...I feel that native spirituality will be an important element in the whole process of rebuilding the presence of the Church among the Native peoples."

---

<sup>1</sup>Titley, Brian, The Church and Indian Residential Schooling, speech to conference August 1992 at p. 16 including quotation from Levaque, Yvon OMI, The Oblates and Indian Residential Schools in Huel, Raymond, editor Western Oblate Studies 1, Edmonton, Western Canadian Publishers, 1990, pp 181-91.

<sup>2</sup>supra, p. 17.



Ogoki Chief Elijah Moonias started his speech by noting that "There is no doubt our community is seriously dysfunctional." He listed many of the social problems that existed there and said, "It would seem that the destructive behaviour of our people in our communities is a symptom that is passed on from the residential school generation. Alcoholism or drug addiction is a condition that appears to be prevalent among these who attended these schools; the outcome being dysfunctional families and hence dysfunctional communities, involving sexual abuse, family violence, suicide, sexually transmitted diseases, etc."

Chief Edmund Metatawabin of Fort Albany spoke on "The Abused Child". He explained the meaning of Keykaywin: The Road to Recovery and examined the impact of abuse on children. Chief Metatawabin closed the conference with another speech. He commented on the parallels between the weather and the spirits of the people who attended. "At the beginning of the conference, the first day, it was cold, dark and gloomy -- this was our spirit. We were confused, heavy with pain ... The days started getting brighter, the beautiful days reflected that we were getting lighter after talking about our experiences."

Sam Achineepineskum recalled how he felt when his parents brought him to the school at age eleven. He believed that his parents sent him because they saw him as a nuisance - someone they wanted out of the way. Once at school, he quickly had problems due to his lack of knowledge of English. This caused many problems for him. He found the atmosphere alien. He was not used to rules other than the rule to respect his parents. Before he went to the school, his parents found him to be someone who could express himself - he was someone with an opinion. When he came back he appeared withdrawn to his parents and did not seem able to express his feelings. Sam said that people needed to find ways to start healing and was glad that the conference had been held to provide a start for this.

Other speakers discussed their experiences in the school and one described how it felt to send her own children to the residential school. Common to all of these speeches was emphasis on the importance of preserving and regaining traditional culture. The fact that the schools had discouraged the use of Cree and Native traditions was seen as a form of cultural abuse. Some of the speakers recalled particularly painful experiences which still affected today, decades after they left St. Ann's. These included not only obvious examples of abuse but also feelings of loneliness, isolation from family (even from siblings who were attending the school at the same time), hunger, fear, confusion due to lack of comprehension of what was expected, shame, hatred, perceived abandonment by parents and a lack of personal privacy and dignity. It was very hard for some to deliver their speeches as their words brought back painful memories.

## Workshops

The Keykaywin conference included a large number of workshops. Their primary purpose was to provide general information on topics of relevance to conference participants. Each workshop included a one hour lecture followed a healing circle that focussed on the lecture topic.

For example, one of the workshops was on the topic of "Child Sexual Abuse". The speakers discussed what a child experiences after he or she has been a victim of sexual abuse. One of them did this from the perspective of someone who had been a victim of this type of abuse. Basic information on the types of people likely to commit abuse, the sorts of prevention and intervention programs that worked best and the resources available in the Mushkegowuk communities was also presented.

Workshops were presented on the following topics:

- 1 Expressing or Repressing Anger
- 2 Residential School Syndrome
- 3 Cultural Fragmentation/Urban Living
- 4 Child Sexual Abuse
- 5 Healing Abuse
- 6 Exploring Other Types of Abuse: Physical, Emotional, Mental, Spiritual
- 7 Developing Self-Esteem in Children and Adults
- 8 Elders Workshop
- 9 Where Are We Now?
- 10 Identifying Existing Resources

## Summary of Activities

Monday, August 17, 1992

Organizational meetings and registration

Opening ceremonies

Panel hearings

Speakers

Alex Spence, *History and Development of St. Anne's*  
 Deputy Grand Chief Jim Morris, *Impact of the Residential School/Suicides in Northern Ontario*  
 Dr. Brian Titley, *Policy of Residential Schools/Beliefs of the Church*  
 Tommy Mattinas, *An Elder's Response: Dealing with the Past*  
 Chief Elijah Moonias, *Dealing with the Abuse*

Social events

Healing circles

Tuesday, August 18, 1992

Speakers

Elizabeth Achineepineskum, Angela Shisheesh, *My Experiences at St. Anne's*  
 Pauline Hunter, *The Story of a Mother Sending Her Children away to a Residential School*

Workshops

Mary Anne Nakogee-Davis, Angela Shisheesh, *Expressing or Repressing Anger*  
 Luke Gull, Elizabeth Metatawabin, *Residential School Syndrome*  
 Nicola Wheesk, Helen Wheesk, Margaret Wheesk-Cooper, Sandra Carr, *Cultural Fragmentation/Urban Living*  
 Elders Workshop

Keykaywin Conference 1992 Report

Panel Hearings

Display

*Photographs from St. Anne's*

Healing Circles

---

Wednesday, August 19, 1992

Speakers

Chief Edmund Metatawabin, *The Abused Child*

Andrew Wesley, *Understanding Abuse*

Workshops

Michael Sutherland, Stella Hookimaw, *Child Sexual Abuse*

Russell Achineepineskum, Frank Achineepineskum, *Healing Abuse*

Rita Scott, Ernest Kwandibens, *Exploring Other Types of Abuse: Physical, Emotional, Mental, Spiritual*

Madeline Robinson, Micheline Edwards, *Developing Self-Esteem in Children and Adults*  
Elders Workshop

Speakers

Sammy Achineepineskum, *Story of a Child Leaving Home to Attend St. Ann's School*

Emma Echum, *Experiences in Other Residential Schools*

Panel Hearings

Kashkun in Concert

---

Thursday, August 20, 1992

Speakers

Bobby Sutherland, *Toward a Healing Process*

Bishop Vincent Cadieux, *The Church's Response*

Keykaywin Conference 1992 Report

---

---

Workshops

Louis Bird, Mary Anne Nakogee-Davis, Elizabeth Metatawabin, *Where Are We Now?*  
Fred Wesley, *Identifying Existing Resources*

Panel Hearings

Report from Panel

Closing Speeches

Grand Chief Bentley Cheechoo  
Chief Edmund Metatawabin

This is Exhibit.....C.....~~the real to it is~~  
affidavit of .....EDMUND METATEWIN.....  
sworn before me, this .....26<sup>th</sup>.....  
day of .....August.....2013.....  
.....[Signature].....  
.....A COMMISSIONER FOR TAKING AFFIDAVITS.....



# MUSHKEGOWUK COUNCIL

P.O. BOX 370  
MOOSE FACTORY, ONTARIO POL 1W0

PHONE (705) 658-4222

FAX (705) 658-4250

February 27, 1997

Mr. Ed Metatawabin  
President  
Peetabeck Keway Keykaywin  
(Survivors of St. Anne's Residential  
School) Association  
Fort Albany, Ontario  
POL 1H0

**FAXED**  
2/27/97

Dear Ed:

On behalf of the Board of Chiefs, I wish to thank you for your presentation on February 19/97.

Although I was not in attendance due to flight delays, I understand that the Chiefs are in support of your association continuing the work to enable the necessary healing of the past members of St. Anne's residential school. Following is the motion which was passed at this meeting:

*Moved by Chief Ernest Beck and seconded by Chief Oliver Wesley that Mushkegowuk Council gives Peetabeck Keway Keykaywin Association the recognition and political support to continue negotiations on the healing process with the federal and provincial governments and the Catholic Church. Further that Mushkegowuk Council will provide the role of a sponsoring agent as required. All in favour. Motion carried.*

Please feel free to call if you have any questions.

Sincerely

Ernie T. Sutherland  
Interim Chairperson

PHONE (705) 658-4222

FAX (705) 658-4250

MUSHKEGOWUK COUNCIL  
ASSEMBLY RESOLUTION

RESOLUTION NO. 1993-04

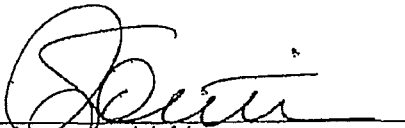
MOVED BY:

Leo Loone  
Fort Albany First NationSubject: Support for Petabek-  
Keywaywin: Association of Former  
St. Anne's Residential School  
Students

SECONDED BY:

Jonathon Solomon  
Kashechewan First NationWHEREAS Mushkegowuk Council is  
concerned about the problems of  
the victims of St. Anne's  
Residential School;

Adopted by Consensus

AND WHEREAS Mushkegowuk Council  
believes it is important to  
support the association of the  
victims of the school, known as  
Petabek-Keywaywin;Certified copy of  
Resolution adopted on  
September 16, 1993AND WHEREAS the members of  
Petabek-Keywaywin have expressed  
the need for counselling support  
to deal with the aftereffects of  
their schooling;THEREFORE BE IT RESOLVED that a  
full time traditional counsellor  
and a full time professional  
psychologist are needed to  
support the needs of the members  
of Petabek-Keywaywin;


Stan Louttit  
Chairman  
MUSHKEGOWUK COUNCIL

AND BE IT FURTHER RESOLVED that  
Medical Services Branch (under  
the co-ordination of Richard  
Jock) is hereby requested to make  
funds available to hire needed  
counsellors.September 16, 1993  
Thomas Cheechoo Jr.  
Memorial Complex  
Moose Factory, Ontario





# MUSHKEGOWUK COUNCIL

P.O. BOX 370  
MOOSE FACTORY, ONTARIO P0L 1W0

PHONE (705) 658-4222

FAX (705) 658-4250

MUSHKEGOWUK COUNCIL  
SIXTH ANNUAL ASSEMBLY  
RESOLUTION

RESOLUTION NO. 1991-10

MOVED BY:

William Sutherland  
Kashechewan First Nation

Subject: Fort Albany Reunion

WHEREAS the effects of Residential Schools to the personal socialization process of individuals can still be felt;

SECONDED BY:


Chief Norm Wesley  
Moose Factory First Nation

WHEREAS some of these effects of the Residential School Syndrome can be listed as: a) poor social adjustment; b) weak parental skills; c) cultural discontinuity, meaning the social, mental and psychological development developed in a vacuum due to the absence of parents and other proper adult guides;

Adopted by consensus

Certified copy of a  
Resolution adopted on:  
August 22, 1991

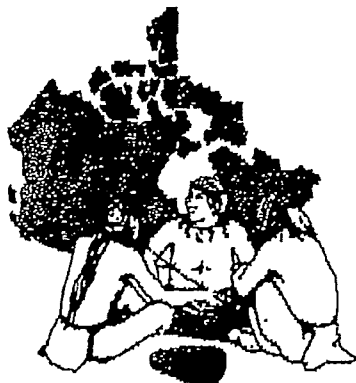
WHEREAS the traditional extended family structure came under severe stress and the future oriented direction from Elders has been diminished;

  
Alex Spence  
Chairman

WHEREAS the healing begins with visiting the original site and facilitating the process of "testimonials" in front of a recognized panel of experts;

August 22, 1991  
New Post Reserve

THEREFORE BE IT RESOLVED that Fort Albany First Nation proceed with their plans to host a Reunion of all students who were at one time "inmates" of the St. Anne's Residential School system, in August of 1992.



## National Indian Brotherhood

### ASSEMBLY OF FIRST NATIONS

HEAD OFFICE:

TERRITORY OF AKWESASNE, HAMILTON'S ISLAND  
SUMMERSTOWN, ONTARIO K0C 2E0  
TEL.: (613) 931-1012 FAX: (613) 931-2488

XIIIth ANNUAL CHIEF'S  
ASSEMBLY RESOLUTION

No. 23/92

MOVED BY:

Chief Del Riley  
Chippewas of the Thames  
First Nation, Ontario

SUBJECT: RESOLUTION NO. 25/90 - REDRESS FOR  
THE HARMS INFLICTED BY THE  
RESIDENTIAL SCHOOL POLICY

SECONDED BY:

Chief Harry Nyce  
Gitwinksihkw First  
Nation, B.C.

WHEREAS the Assembly of First Nations has passed Resolution No. 25/90 "Redress for the Harms Inflicted by the Residential School Policy" in Assembly on December 11, 1990; and

WHEREAS many First Nations peoples attended residential schools and suffered physical, psychological and sexual abuse; and

WHEREAS the residential school system was one of many attempts to destroy First Nations languages, culture and traditions; and

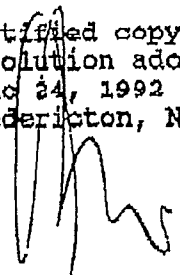
WHEREAS the effects of residential schools are inter-generational and extensive; and

WHEREAS the Assembly of First Nations has been empowered to seek action to deal with the areas falling under the resolution,

THEREFORE BE IT RESOLVED THAT the Assembly of First Nations pursue a three-part strategy consisting of:

1. the development of a national framework to enhance the provision of appropriate healing processes for residential school survivors of abuse; and

Certified copy of a  
Resolution adopted on  
June 24, 1992  
Fredericton, N.B.

  
Ovide Mercredi  
National Chief

BRANCH OFFICE:

55 MURRAY ST., 5TH FLOOR, OTTAWA, ONTARIO K1N 5M3 TEL: (613) 238-0873 FAX: (613) 238-5780

XIIIth ANNUAL CHIEFS  
ASSEMBLY RESOLUTION

- 2 -

No. 23/1



June 24, 1992  
Fredericton, N.B.

2. implementing a process by which historical record can document the abuse experienced by former residential school students; and
3. to establish a compensation mechanism that would include the need to rebuild and repair personal, cultural and linguistic capacities arising from the wrongs caused by the residential school system.



# MUSHKEGOWUK COUNCIL

Box 370

Moose Factory, On. P0L 1W0

Tel: 705-658-4222

Fax: 705-658-4250

June 15, 2000

Attawapiskat  
First Nation

Alternative Dispute Resolution Group  
St. Anne's Residential School Survivors Association  
General Delivery  
Fort Albany, Ontario  
P0L 1H0

Kashechewan  
First Nation

Dear Sir/Madam:

Fort Albany  
First Nation

The processes of Mediation or Alternative Dispute Resolution are better understood by the membership of the Mushkegowuk people of western James Bay. It is equivalent to what they may have used in the past to settle grievances among themselves.

Moose Cree  
First Nation

In 1994 the Elders advised Pectabeck Keway Keykaywin Association (the St. Anne's Residential School Survivors association) to seek alternate ways of resolving the legacy left behind by the abuses suffered in residential school. They further sought the help of the government and the church by saying that for true reconciliation to happen, the parties that inflicted the pain must acknowledge the harm done and work with the victims towards restoration.

New Post  
First Nation

Chapleau Cree  
First Nation

The St. Anne's Residential School Alternate Dispute Resolution Pilot Project has the potential to find 'restoration and reconciliation', for the survivors, in partnership with the government and the Catholic Church. The representation of the Association have decided to try the ADR process over the more destructive litigation route.

Missinabic Cree  
First Nation

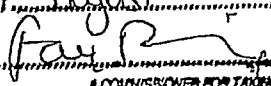
We, the Mushkegowuk Council, encourage the Alternate Dispute Resolution Group to continue working on the process and show the people and especially the survivors, that solutions are possible through communication. We hope to see positive results very soon.

Sincerely

*for Lawrence Martin*  
Lawrence Martin  
Grand Chief

c.c. Government of Canada  
Catholic Church

Justice Canada  
PKKA

This is Exhibit.....D.....  
affidavit of.....EDMUND METCHWORNEN  
sworn before me, this .....26<sup>th</sup>.....  
day of.....August.....2013.  
  
A COMMISSIONER FOR TAKING AFFIDAVITS

**OPP SPECIAL INVESTIGATION OF ST. ANNE'S RESIDENTIAL SCHOOL****ANTICIPATED EVIDENCE OF D/C GREG DELGUIDICE**

Telephone call: April 26, 2013

*The following are the recollections only of D/C Delguidice. In attendance on the conference call was Norm Feaver, legal counsel with the Ministry of Community Safety and Correctional Services. D/C Delguidice has very limited OPP documentation at this stage, and he does not have access to or possession of the court documents. These are his recollections, if any, and are subject to what is contained in the OPP documentation.*

1. You are currently a Provincial Constable assigned to the Cochrane detachment?
  - Detective Constable assigned to Cochrane detachment
2. November 22, 1992, you were seconded to the #15 District Criminal Investigations Unit for the purposes of investigating allegations of physical and sexual abuse at St. Anne's residential school (reference to his statement in the crown disclosure brief in the Daniel Wheesk material).
  - yes
3. St. Anne's was not operating as a residential school in 1992?
  - correct
4. How did the OPP investigation arise?
  - Then Chief Ed Metatawabin (FAFN) entered police office: he advised police of the allegations of abuse made by people during the St. Anne's school reunion. D/C Delguidice not personally in attendance at that time.
  - During the summer of 1992; St. Anne's school reunion in Ft. Albany. Stories came out about operation of the school that could constitute criminal activity.
  - Process: There were a few of us from around District #15, that when allegations of abuse at a school came out, OPP command staff put together a team, figuring it could be another institutional historical abuse case. This was the 3<sup>rd</sup> such institution raising allegations of historical abuse (Mt. Cashel in Nfld. and Alfred Boys School in Ontario.) Not sure how many original complainants were disclosed to staff through Chief Metatawabin. South Porcupine. District 15. Team brought together from other detachments. Four investigators and one detective sergeant.

---

- 2 -

- People coming forward with their stories. When we investigated, we would talk to someone whose name was provided. Line of follow up. Witnesses' names would be given. Names of others whom they witnessed aggression against. Interviews grew that way.
  - Sometimes in small community like Ft. Albany, people would knock on the door and say that "I hear you are here for the St. Anne's investigation and I would like to talk to you." Normal word of mouth means of communication in the North.
5. School building still was standing in 1992 in Ft. Albany?
- Yes.
6. Certain citizens came forward with information to the OPP about sexual and/or physical abuse; what would be done to record the information?
- Would create documentation
  - Like any case management system (just developing a newer computer program). We documented things into the computer program designed to provide case management.
  - Daniel Wheesk documentation is an example of the documentation created by the OPP to record the information given to the OPP.
  - Intake information on officer notes. Input the information into computer.
  - Policeman would handwrite the statement. The witness would have chance to go over it and sign it. Gave the person the option to have the statement read back to them. Some wanted to read it themselves. Then, the person would sign the statement with any corrections.
7. The people interviewed were formerly students at St. Anne's, while they were children?
- Yes. For most part.
  - Approximately 992 statements from about 700-750 people were taken by OPP.
8. Generally, the people interviewed as witnesses/victims, were children when the abuse happened to them at St. Anne's?
- Yes. No statutory limitation for any sexual abuse. Crown must proceed by indictment. More serious type of charge, than if proceeds summarily.
-

Limitation period of 6 months to proceed summarily, so given nature of historical allegations can only proceed by indictment.

9. How did people know they could provide their information to the police?
  - Chief Metatawabin
  - Attendance at police station and word of mouth
  - Not aware of any official announcements in the communities.
10. Who was the crown prosecutor?
  - Original Crown was Martin Lambert. After investigation had been underway for a while, it was assigned to special prosecutor—Diana Fuller. She was in Sudbury at the time.
11. Over what period of time were former students interviewed?
  - 1992 to 1997 and perhaps after the charges were laid.
  - Cannot recall if more people came forward after the charges were laid.
  - Other people have called the OPP since the criminal trials ended, but after all the years of interviews and 2 years in court, there has been no more investigation by OPP.
  - About 1.5 years ago, someone called OPP and asked to provide information about abuse. OPP investigation all closed. Told the person to talk to NAPS in Ft. Albany, who could determine where to lay any charges. [Jurisdiction was transferred to NAPS after 1997.]
12. People interviewed were residing mostly in the James Bay coastal region?
  - Majority still resided there. Had to travel elsewhere in the province to interview people.
13. Were the interviews recorded in any fashion (written, oral, video?)
  - Written and signed statements as per the example of Daniel Wheesk's file; information input into computer system.
14. Search warrants were issued by the court and several thousand documents were taken into possession of OPP for review
  - St. Anne's residential school no longer operated when the special investigation was underway. There was still the old building in Ft. Albany. No documents were located there.



15. Documents obtained by OPP related to the operations of the school while it was operating as an Indian residential school?
  - yes
16. Any documents found on the school site itself about operation of the school?
  - No.
17. Documents were kept by OPP? Where are they now?
  - Orillia, Ontario. All the crown briefs for any charges proceeded with may still be in existence there
  - Items were received under search warrants or through FOI requests; about 7000 documents were itemized and catalogued. Took a year to catalogue the documentation seized or gathered. After cataloguing all obtained records and documents, only those records and documents germane to the investigation were kept. The rest were returned to their owners. The items found to be germane to the investigation were used in moving forward. At the end of the criminal proceedings, if records or documents were not entered by the Crown as an exhibit, we returned those records or documents to their owners. Upon expiration of court processes and appeal periods, those records and documents entered as exhibits were returned to D/C Delguidice by the courts, and he made arrangements to have them returned to the original owners.
  - Those 7000 original documents, vast majority not in Orillia, as originals were returned. There were copies of some obtained records made by OPP for inclusion in Crown Briefs. There are only copies left in Orillia, not originals.
  - Documentation was itemized and catalogued.
18. Attendances in Montreal and other cities to gather documents in the possession of the Catholic Church about St. Anne's or the former supervisors who were under investigation?
  - Yes. For records/documents pertaining to operation of the school and the former supervisors.
  - Documents were seized in Montreal and other cities from the Catholic Church.

---

- 5 -

- *Norm Feaver: He cannot get to sources of information for the warrants. Cannot say if information from those sources factored into the criminal charges.*
  - Search warrants were issued in Ottawa, Montreal, Moosonee, and Ft. Albany for seizure of evidence by OPP.
  - As soon as the trials were finished, they became a matter of public record. Anyone can go to whichever court house where a charge was filed for a transcript of a trial. If there were exhibits, a record of their introduction into evidence would be available for inspection although all exhibits were subsequently returned.
19. So the Catholic Church authorities became aware that the OPP were doing a criminal investigation of the operation of St. Anne's while it was a residential school?
- Yes. Cannot identify the person.
20. Any documents from the Federal Government? If so, from Ottawa? What department?
- Yes. Federal archives.
  - Generally, did not alert people to what the nature of the investigation was, which is normal police procedure.
  - FOI requests to the Federal Government, not search warrants.
  - D/C Delguidice cannot say if any federal government official was notified about the criminal investigation of St. Anne's.
21. So the OPP gathered oral and documentary evidence over about 5 years, and then started to lay charges against all these former supervisors, who were adults when the victims had been children at the residential school? See Globe and Mail article Sept 19, 1997.
- 
-

- 6 -

- a. Anna Wesley of Moosonee
    - yes
  - b. John Moses Rodrigue of Timmins
    - yes
  - c. Claude Lambert of St. Andre-Avellin, Quebec
    - yes
  - d. Claude Chenier of Aylmer, Quebec
    - yes
  - e. John Cushing of Kitchener, Ontario
    - yes
  - f. Marcel Blais of Ottawa
    - yes
  - g. Jane Kakeychewan of ??
    - Yes; D/C Delguidice does not recall where she was residing at the time.
22. Was the Federal Government ever made aware of the charges, to your knowledge?
- I don't know.
  - Did not see any federal government official attend at any of the trials.
23. To your knowledge, since the class action settlement or even before, has the Federal Government sought to review or obtain the OPP documents, housed in Orillia in Criminal Investigation Division?
- Not that I am aware of.
24. Some former students who had been interviewed, were told that their evidence would not be sufficient to proceed with criminal charges?
- Crown privilege as to who was charged or not. Cannot say what witnesses/complainants were told.

25. The Attorney General of Ontario made the decision who would be charged and with what?
- When criminal allegations arise: the OPP conduct an investigation. In special cases, they consult with the Crown's office. A decision whether to proceed with prosecution or not will lie with Crown Attorney's office. A decision whether to lay a charge/swear to an information rests with the police.
  - In the normal course, police conduct an investigation and decide whether there are reasonable and probable grounds to believe an offence has been committed. If so, a charge may be laid/information sworn to by the investigating officer. The Crown Attorney has the ultimate decision whether to proceed with prosecution of criminal charges. If the Crown, after having reviewed the matter, decides there is no reasonable prospect for a conviction, the Crown Attorney can withdraw or stay the charges. In special cases such as this investigation, consultation between the Crown Attorney and investigators took place in order that the Crown is aware of each allegation made, and whether there was a reasonable prospect of a conviction for each allegation. The Crown decided which allegations had a reasonable prospect of conviction, and the investigative team opted not to lay charges in the matters of allegations which the Crown felt had no reasonable prospect of a conviction.
  - Norm Feather: Burdens are different for police: reasonable and probable grounds to lay a charge as opposed to reasonable prospect of conviction for the Crown
  - If there are issues of evidence or historical abuse, as here, then OPP work collaboratively with the Crown to determine if and when charges are going to be laid.
  - There was prior consultation with the Crown before these charges were laid.
26. There was no class action law suit in 1997 that you were aware of for Indian Residential schools? Was there any civil law suit you were aware of in 1997 against St. Anne's?
- These citizens came forward and provided information to the OPP when there was no known litigation or prospect at that time of making money that I'm aware of.
27. By 1997, were any allegations against former supervisors at St. Anne's that might have led to criminal charges but they were already dead?

- Yes.
28. So there were some former supervisors still alive, against whom there were allegations, but charges were not laid against all the former supervisors still alive in 1997?
- *Norm Feaver: not able to answer that – Crown privilege*
29. In the almost 1000 interviews that were conducted, were there any documents seized that recorded physical abuse of former students of St. Anne's while it was operating as a residential school?
- No letters or memos from the time that recorded the abuse.
30. In the almost 1000 interviews that were conducted, were there any documents created by OPP that recorded sexual abuse of former students of St. Anne's while it was operating as a residential school?
- Yes.
31. In the almost 1000 interviews that were conducted, were there any documents created by OPP that recorded physical abuse of former students of St. Anne's while it was operating as a residential school?
- yes
32. Physical abuse:
- a. Physical beatings using a whip that had about 4 strands coming out of a handle and at each end of the strand was some piece of metal or a knot containing a piece of metal? Was it ever found?
    - In Daniel Wheesk's statement—aware of that allegation.
    - Never found it.
    - Can't say for sure if others recalled seeing a similar whip.
  - b. Any whipping/beatings devices ever physically located?
    - No.
    - Nature of physical abuse at the school: common assault, assault causing bodily harm. In a school structure. Supposed to be structured.
    - Some commonality.

---

- 9 -

- Device to beat the children: More than one witness alleged being whipped. Variations as to what they were whipped with. Not recall off the top of my head.
  - c. Physical assaults causing bodily injuries (Edmund Mudd had his head kicked into a radiator in dining room after throwing a snow ball.)
  - Not recall off top of my head.
  - d. Use of the electric chair to administer electric shocks to children who were tied into the chair?
  - Aware allegations about an electric chair being used were made by more than one witness.
  - OPP did not find the chair itself.
  - OPP investigation found evidence of the chair.
  - e. There were consistent reports of an electric chair. Some reports suggested it was used for entertainment, with one of the staff being able to withstand the shocks the longest to the amusement of many. Other students alleged to have been disciplined in the electric chair. Beating children to force them to eat their own vomit?
  - Numerous people alleged that. Sure, it affected them.
  - f. Homosexual rape?
  - yes
  - g. Heterosexual rape?
  - yes
  - h. Sexual fondling?
  - yes
  - i. Forced masturbation?
  - yes
33. So the documents generated and/or gathered by OPP dealt with physical and sexual abuse of children at St. Anne's while it was operating as a residential school?
-

---

- 10 -

- Yes.
34. Supervisor-child?
- yes
35. Student on student abuse investigated?
- Some allegations.
36. Did you investigate any deaths of children while they were at the school?
- There were allegations of three boys who ran away in early years. OPP investigation showed a former RCMP inquest.
  - Other than that, no investigations of deaths that I recall—
37. Criminal Jury trial of **Anna Wesley**: "Yellow legs"
- a. What were the charges? Jury trial
    - Also went by name Sister Marie Immaculata. Aboriginal woman. Appointment by the Catholic Church as a nun.
    - Assault and administer a noxious substance.
    - Documents (transcripts and record of exhibits, etc.) should be at the courthouse in Cochrane.
  - b. Did she have a lawyer to represent her?
    - Yes. Gilles Charlebois. He often acted for accused persons in this investigation
  - c. Her lawyer was given crown disclosure brief in advance of trial?
    - Crown would have provided defense with disclosure.
  - d. Did the Catholic Church have a separate lawyer at the trial?
    - No.
  - e. What disclosure was the Catholic Church given in advance of the trial?
    - Crown would have provided disclosure to accused counsel;
  - f. Was the Federal Government made aware of the trial?
    - No knowledge
-

- 11 -

- g. Did the testimony of the witnesses deal with the time frame when the school was operated as an Indian Residential School?
- Yes.
- h. How many witnesses testified?
- Several; unknown exact number.
  - Nature of allegations against her: 5 counts each of common assault and administer noxious substance and 2 counts of assault causing bodily harm.
  - She was in the role of supervisor at the time the events happened.
  - Pretty sure Anna Wesley did not testify.
  - Do not believe she called any witnesses in defence.
- i. Public trial?
- Don't recall any publication bans.
- j. Transcripts were generated? Where now?
- Trial was recorded. Not sure if there was a transcript ordered. Transcript is supposed to be available to people. Must be generated if there was an appeal or specific request.
- k. Exhibits filed? Where now?
- Returned originals to owners.
- l. Any students other than Daniel Wheesk and Edmund Mudd testify?
- yes
- m. She was found guilty of physical assault and administering a noxious substance with the intention to annoy/harass?
- D/C Delguidice drafted memos to the CIB inspector with her charges and sentencing. D/C Delguidice cannot currently locate the memos, but has one document with all the charges. The charges are listed at the courthouse in Cochrane.
  - The referred to memo was located and indicates the following:

On the 17<sup>th</sup> of September 1997, as a result of the St. Anne Residential School Investigation, an information was laid against Anna WESLEY, also known as Sister Marie Immaculata, formerly of the Sisters of Charity of Ottawa. There were thirteen



- 12 -

counts alleged in the information, those being 5 counts of administering a noxious thing, 5 counts of common assault, and 3 counts of assault causing bodily harm.

In May of 1998, preliminary hearings were held on the above matters in Moosonee Ontario. As a result, twelve of the thirteen counts were committed to trial. One of the common assault counts was amended at the preliminary hearing to read assault causing bodily harm. Furthermore, in the interim between the preliminary hearings and trial, Crown Attorney Diana FULLER opted not to proceed with one of the common assault and one of the administering a noxious thing counts.

This in effect left ten counts remaining to be tried at trial. They are three counts of common assault, three counts of administering a noxious substance, and four counts of assault causing bodily harm.

The trial in question took place at Ontario Court, General Division courtroom at Cochrane Ontario. It went from the 26<sup>th</sup> of April 1999 until the 20<sup>th</sup> of May 1999, and was by way of judge and jury. The judge was Mr. Justice Robert BOISSONNEAULT of Cochrane, defence counsel was Mr. Gilles CHARLEBOIS of Ottawa, and as previously stated, the Crown Attorney was Ms. Diana FULLER of Sudbury.

On the 20<sup>th</sup> of May 1999 in the afternoon, after having been out since the previous morning, the jury returned with guilty verdicts on eight of the ten counts. The particulars of the ten counts and their results are listed as follows:

1. C O U N T #	2. CHARGE	3. VERDICT
1	Common Assault	Guilty
2	Administer Noxious Thing	Guilty
3	Assault Bodily Harm	Not Guilty
4	Assault Bodily Harm	Directed Verdict – Not Guilty
5	Common Assault	Guilty
6	Administer Noxious Thing	Guilty
7	Assault Bodily Harm	Not Guilty A.B.H. – Guilty Common

		Assault
8	Common Assault	Guilty
9	Administer Noxious Thing	Guilty
10	Assault Bodily Harm	Guilty

Sentencing on the above matters has been set for Thursday the 24<sup>th</sup> of May 1999 at Ontario Court General Division Courtroom at Timmins.

- She received 11.5 months conditional sentence.
- Some people spoken to throughout the investigation told us they believed there should not be an investigation, because they were so old, but not aware of any pressure from the Catholic Church on witnesses to not take part in the criminal investigations.

38. Criminal Jury trial of **Jane Kakeychewan**:

- a. What was her role? Any other names?
  - Her trial was before Anna Wesley's trial.
  - Nun at the school. Also went by Sister Catherine Tekakwitha. Aboriginal woman.
  - Had an appointment from the Catholic Church.
  - With respect to complainants, oftentimes, they use more than one name when referring to others, or the names they use or refer to are written differently. Cannot necessarily go with the name they provide you. They often provide you with the phonetical pronouncèment of the name as they perceive it to be. There are lots of different spellings and pronunciations, even within the same family.
  - Some Cree family names have several different variations. Example: Kamalatist, Kamalatishesit. Another example: Hookimaw; Okimaw; Hookimawill; Hookimawillilene; Okimawillilene; all within the same family, but spelled and pronounced differently. Many variations.
  - Jane Kakeychewan found guilty of three charges of assault causing bodily harm. Nov 1998 convicted. Sentenced on Jan 12, 1999. Conditional sentence #1: 3 months. Conditional sentence #2: 2 months; Conditional sentence #3: 1 month. All three were consecutive. 6 months total. She did not go to jail. She would have had probation for that.

---

- 14 -

- b. What were the charges? Where?
    - Trial was at Cochrane, Ontario. ????
  - c. Three counts of assault causing bodily harm. Did she have a lawyer to represent her?
    - Yes. Gilles Charlebois.
    - Further to the above, I have since located an update memo as follows detailing the charges and findings after trial:
  - Jane KKEYCHEWAN-BELANGER was charged in October of 1997 with three counts of Assault Causing Bodily Harm. The charges stemmed from the St. Anne Residential School Investigation. Mrs. BELANGER, as she is now known, appeared in Ontario Court General Division courtroom at Cochrane for her trial, which lasted from Monday the 9th of November 1998 until Wednesday the 18th of November 1998. The trial Judge was his Honour Judge Robert BOISSONEAULT. Defence council was Mr. Gilles CHARLEBOIS, and acting as agent for the Crown was Ms. Diana FULLER. At the conclusion of the trial, a finding of guilt was made on all three counts in the indictment. As such, and at the request of the Crown, sentencing has been put over until Tuesday the 12th of January 1999.
    - d. Her lawyer was given crown disclosure brief in advance of trial?
      - Crown would have provided disclosure.
    - e. Did the Catholic Church have a separate lawyer at the trial?
      - Same as Anna Wesley. No.
    - f. What disclosure was the Catholic Church given in advance of the trial?
    - g. Crown would have provided disclosure to accused counsel. Was the Federal Government made aware of the trial?
      - No knowledge
    - h. Did the testimony of the witnesses deal with the time frame when the school was operated as an Indian Residential School?
      - Yes.
    - i. How many witnesses testified?
      - Cannot recall. There were three complainants/victims, one for each count.
    - j. Public jury trial?
-

---

- 15 -

- Public trial yes. No publication bans. Was not a jury trial. Judge alone.
- k. Transcripts were generated? Where now?
- Not sure if transcripts were generated, but it was recorded. It would be at the Cochrane court house.
- l. Exhibits filed? Where now?
- Records of any exhibits filed would be at the Cochrane court house. Originals were returned to their owners.
- m. Any students other than Lucie Scott and Harriott (Sutherland) Paul Martin testify?
- Physical abuse nature. Cannot recall exactly how many witnesses testified. Three complainants testified.
- OPP Never charged anyone with respect to allegations about the electric chair.
- n. She was found guilty of physical assault and administering a noxious substance with the intention to annoy/harass?
- No.

39. Criminal Jury trial of **John Cushing**:

- a. What was his role at school? Any other names?

- 

His employment at the FORT ALBANY St. Anne's Residential School began in early September 1967. At that time he was a lay person working at the school at an unknown position. This employment continued until April 1, 1970, at which time he was appointed to the Department of Indian Affairs and Northern Development as the Director of Support Services and Aid to the School Administrator. Mr. CUSHING remained at this position until taking a year's sabbatical starting September 1974, at which time he left the community of FORT ALBANY. On January 10, 1975, he resigned from the position at the school.

- No other names are known.
-

---

- 16 -

- Not a religious person. Not affiliated with Catholic Church.
- Information laid would say time frame in question. He started at the school in 1967. He ended his employment at school January 10 1975. Part of the Crown brief. (*Detective Constable Delguidice has some of the information in his office about this accused.*)
- John Cushing had been retired for some time at time of charges.
- b. What were the charges?
  - One count of Indecent Assault on a Male. Trial was in Guelph. That is where offence is alleged to have taken place.
  - Related to St. Anne's. Field trip to Guelph.
- c. Did he have a lawyer to represent him?
  - Yes. Paul Noble.
- d. His lawyer was given crown disclosure brief in advance of trial?
  - Crown would have provided disclosure.
- e. Was the Federal Government made aware of the trial?
  - No knowledge
- f. Did the testimony of the witnesses deal with the time frame when the school was operated as an Indian Residential School?
  - Yes.
- g. How many witnesses testified?
  - One person testified, who was a residential school student at the time of the allegation. No corroborating witness, as far as D/C Delguidice can recall.
- h. Public trial?

On 30 November 1998, John CUSHING attended at Ontario Court Provincial Division Courtroom at Guelph Ontario. The purpose of the appearance was a Preliminary Hearing on the charge of Indecent Assault on a Male. Counsel for the accused was Mr. Ronald NOBLE, and the Crown Attorney was Ms. Diana FULLER. The presiding judge was his honor Norman DOUGLAS.

---

---

- 17 -

The Preliminary Hearing was conducted, and the matter was committed to trial. It was then put over to Assignment Court in Guelph on the 12<sup>th</sup> of January 1999.

- Trial by judge alone. Acquitted.
- i. Transcripts were generated? Where now?
- Same information as above Ontario Court of Justice – Guelph, ON
- j. Exhibits filed? Where now?
- Same information as above
- k. He was found not guilty?
- Acquitted.

40. Criminal Jury trial of **John Moses Roderique**:

- a. What was his role at school? Any other names?
    - Employee of school. Not religious person.
    - Affiliated with the school. Started as cafeteria helper in September 1969. He was in that position until December 1971. Then employed by Dept. of Indian Affairs and Northern Development. Assistant shift engineer. (*D/C Delguidice has some information in his office on this matter.*)
    - Unknown whether he went by any other name.
    - There was no trial. Guilty plea, taken in Timmins. Accused lived there at the time.
  - b. What were the charges?
    - Indecent assault on a male x 4; gross indecency x 2.
  - c. Did he have a lawyer to represent him?
    - Brad Sloan. Likely 1998 or 1999.
  - d. His lawyer was given crown disclosure brief in advance of trial?
    - Crown would have provided disclosure.
  - e. Did the Catholic Church have a lawyer at the trial?
    - No.
  - f. Was the Federal Government made aware of the trial?
-

- 18 -

- No knowledge
  - g. Did the anticipated testimony of the witnesses deal with the time frame when the school was operated as an Indian Residential School?
  - yes
  - h. How many witnesses testified?
  - No one testified. May have read in victim impact statements.
  - Crown would have read in the facts to the judge. For judge to enter the conviction, would need to hear the evidence. That would be recorded.
  - Crown then adduces evidence as to sentencing.
  - May have been exhibits of victim impact statements for sentencing.
  - i. Public trial?
  - No publication ban.
  - j. Transcripts were generated? Where now?
  - Court process recorded. Not sure if transcripts ordered.
  - k. Exhibits filed? Where now?
  - Same as above.
  - l. Which former students testified?
  - None testified, but the facts read in would include the names of the victims.
  - m. He was found guilty or did he plead guilty?
  - He pleaded guilty.
41. Criminal Jury trial of **Claude Lambert**:
- a. What was his role at the school? Any other names?
  - Charged one count of indecent assault on a male.
  - Child care worker 1966 to June 1968 at St. Anne's. Civilian employee (non-religious)
  - b. Where was the trial?
  - I don't know.

---

- 19 -

- Only way to transfer to another jurisdiction, is on a guilty plea.
  - c. What were the charges?
    - Charged one count of indecent assault on a male.
  - d. Did he have a lawyer to represent him?
    - Cannot see any name in the documents still available to D/C Delguidice.
  - e. His lawyer was given crown disclosure brief in advance of trial?
    - Crown responsibility.
  - f. Did the Catholic Church have a lawyer at the trial?
    - Unknown
  - g. Was the Federal Government made aware of the trial?
    - No knowledge
  - h. Did the testimony of the witnesses deal with the time frame when the school was operated as an Indian Residential School?
    - Unknown whether witness(es) testified at any proceedings. Allegations made to police were within the timeframe when the school was operated.
  - i. How many witnesses testified?
    - Unknown
  - j. Public trial?
    - Unknown
  - k. Transcripts were generated? Where now?
    - Same as above, but not sure where the plea of guilty and conviction was entered.
  - l. Exhibits filed? Where now?
    - Same as above
  - m. Which former students testified?
    - Not known
  - n. He was found guilty?
    - Convicted
-



42. Criminal Jury trial of **Claude Chenier**:

- a. What was his role at the school? Any other names?
  - Non-religious. Began employment Oct 1, 1970. Child care worker looking after the boys section of the school. He resigned and Oct 25, 1971 to return to university.
- b. What were the charges? Where was the trial?
  - One count of indecent assault on a male.
  - I recall the preliminary hearing in Moosonee, because the complainant would not get on the plane in Ft. Albany. Charges were withdrawn.
  - Recorded in Moosonee courthouse.
- c. Did he have a lawyer to represent him?
  - Lawyer but do not recall who. Gilles Charlebois spent a lot of time in Moosonee for the preliminary hearings for most of the charges.
  - Preliminary hearings were in the Ontario Court of Justice in Moosonee.
- d. Did the intended testimony of the witnesses deal with the time frame when the school was operated as an Indian Residential School?
  - yes
- e. Transcripts were generated? Where now?
  - Recorded proceedings in Moosonee.
- f. He was found guilty?
  - Charges withdrawn.

43. Criminal trial of **Marcel Blais**:

- a. What was his role at the school? Any other names?

Non-religious person. From witness statements taken throughout the investigation, it is only known that he worked at St. Anne's Residential School as a kitchen aid during the school year 1969-70. No personnel file has been found on this subject at any search warrant location. The only evidence of his attendance at FORT ALBANY, aside from witness

- 21 -

statements, is a guest register belonging to a teacher in which Marcel BLAIS signed his name as having visited the teachers' residence.

- Only thing known was that about 1969-1970, he was a kitchen aid at the school.
- b. Where was the trial?
  - Preliminary hearing at Moosonee likely.
  - All first appearances were in Sudbury.
- c. What were the charges?
  - Indecent assault on a male
- d. Did he have a lawyer to represent him?
  - Not recall.
- e. His lawyer was given crown disclosure brief in advance of trial?
  - Same as above
- f. Did the Catholic Church have a lawyer at the trial?
  - Unknown.
- g. Was the Federal Government made aware of the trial?
  - No knowledge
- h. Did the testimony of the witnesses deal with the time frame when the school was operated as an Indian Residential School?
  - yes
- i. How many witnesses testified?
  - Not sure
- j. Public trial?
  - Court process would have been recorded
- k. Transcripts were generated? Where now?
  - Same as above
- l. Exhibits filed? Where now?

---

- 22 -

- Same as above
  - m. He was found guilty?
  - Plead Guilty.
44. Did you hear of Ernest Beaudoin: Dead by then? "Meechamabe"
- Heard of Brother Ernest Beaudoin.
  - No charges were laid against him.
  - He was not dead at the time of the investigation.
45. Father Lavois: Dead by then?
- His name was brought up during the investigation.
  - Dead by then.
46. Bishop Laguerrier?
- At onset of investigation, he was Bishop at Moosonee Diocese.
  - He died in the middle of investigation, before charges were laid. He was not alive for any of the trials.
47. Father Langois?
- Dead by then.
48. Sister Henri Gerard?
- Heard of her
  - Don't recall if dead already
  - Never charged
49. Sister Mary Eli?
- Heard the name
  - No charges laid
  - Not known if alive or dead at the time of investigation.
50. Brother Jutras? Dead by then? "Cookskin" in Cree
- Heard of him
  - Not sure if alive or dead at the time of the investigation
51. Sister "Grasshopper"
- Heard it before. Do not know who that nickname is in reference to.
-

---

- 23 -

52. Brother Goulet (built the electric chair)
- Heard the name
  - No charges were laid.
  - Do not recall if alive or dead at the time of the investigation.
53. Emile Sutherland
- Do not recall that name.
54. "Walrus Teeth" Sister
- Do not recall
55. Laura Wheesk (aboriginal supervisors of small girls)
- Do not recall anything specific to her.
56. Student Mary Jane Metatawabin
- Common name.
  - No charges.
  - No charges ever laid for allegations of student on student abuse.
57. Sister St. Lea
- Heard the name
  - No charges.
  - Not sure if alive or dead.

Nothing else to be communicated.

*Norm Feaver: When did allegations leave OPP to go to NAPS?*

*D/C Delguidice: After the First Nation Policing agreements were signed. NAPS may have own records of possible criminal charges. I have not been contacted by NAPS after OPP turned over jurisdiction asking for old investigation materials.*

*If NAPS had any records about allegations would go to Nishnawbe Investigation Unit. Regional headquarters are in Cochrane.*

*Norm Feaver: Would prefer to create a record after D/C Delguidice testifies once. Ottawa or Toronto is fine for place to give testimony.*

---

- 24 -

Upon further review, I have been able to locate the following documents which may shed light to above questions. The first is an investigation history attached hereto:

#### **HISTORY OF INVESTIGATION{PRIVATE }**

During the month of August 1992, a healing conference was organized at FORT ALBANY by the First Nations Band Council for former students of St. Anne's Residential School. The conference, which lasted from August 15 - 23, saw nineteen males and eleven females testify before a First Nations formal panel. Of the nineteen males, ten complained of sexual abuse and most complained of physical and mental abuse. Of the eleven females, two complained of sexual abuse and most of the females complained of physical and mental abuse.

Other incidents reported to the panel are as follows:

- The case of three runaway boys from the school in late April 1941, whom were never seen nor heard from again. Some bones were unearthed some years ago which may or may not have been those of one or more of the boys.
- A girl who had been raped, impregnated, and had her baby taken away at birth, never to be seen or heard from again.
- Various incidents in which boys and girls at the school were allegedly forced to eat their vomit.

---

- 25 -

On November 6, 1992, Edmund Metatawabin, Chief of the Fort Albany First Nation Territory, attended the No. 15 District Headquarters of the Ontario Provincial Police in SOUTH PORCUPINE, Ontario. At this time, he formally requested that an investigation be conducted concerning two suspicious deaths, and various incidents of sexual and physical abuse that allegedly took place at St. Anne's Residential School, FORT ALBANY.

Prior to reporting this occurrence to the police, Chief Metatawabin appeared before a Royal Commission on Aboriginal Peoples hearing in TIMMINS, Ontario on November 4 & 5, 1992. The details of these occurrences were reported by Chief Metatawabin to the Royal Commission.

As a result of the information received from Chief Metatawabin, a criminal investigation was commenced by the No. 15 District Criminal Investigation Unit of the Ontario Provincial Police. The investigation, which has lasted some four-and-a-half years, has encompassed approximately nine hundred interviews of potential witnesses and victims, and several searches of various religious orders and government facilities. The search locations included OTTAWA, SUDBURY, MOOSONEE, and MONTREAL.

The case of the three runaway boys in April 1941 has been investigated. The cause of death was clearly established as accidental, with no fault attributed to the staff at the St.

---

---

- 26 -

Anne Residential School. The bones found some years ago are not associated to the death of the three runaway boys.

All allegations of potential criminal misconduct which were reported at the August 1992 healing conference, as well as numerous other alleged occurrences were investigated and the results of the said criminal investigations reported on.

---

This is Exhibit E .....  
affidavit of EDMUND METATAWABIN  
sworn before me, this 26<sup>th</sup>  
day of August 2013  
[Signature]  
A COMMISSIONER FOR TAKING AFFIDAVITS



PAGE (1)

IMPRIMATUR:

† ELIE A. EVÊQUE DE CATENNA

Vicaire apostolique  
du Témiscamingue.

L. J. C. & M. I.

PRIÈRES, CATÉCHISME  
CHEMIN DE LA CROIX  
ET CANTIQUES

A l'usage des Sauvages de Fort Hope  
de Martin's Fall's et de New Post

ᐃᐃ.ᐅ.ᐃ ᐃᐅᐅᐅ.ᐃᐃ: ᐅᐅ ᐃᐅᐅ  
Par P. Léon Caillé, O.M.I.



MONTRÉAL.  
LIBRAIRIE BEAUCHEMIN LIMITÉE  
79, rue St-Jacques

1910

## APPROBATIONS

Sur la demande du R<sup>év.</sup> PÈRE F.-X. FAFARD, O. M. I., missionnaire des tribus sauvages de la Baie d'Hudson, et supérieur de la résidence d'Albany. Nous approuvons le livre ayant pour titre: Catechisme de Persévérance, en langue orise, caractères syllabiques, pour l'usage des sauvages des Postes d'Albany, Savern, Martin's Falls, etc., (Baie d'Hudson et Baie James), et Nous permettons qu'il soit livré à l'impression.

† N.-Z. LORRAIN,

*Evêque de Pembroke.*

Pembroke, 25 mars 1884.

A la demande des Pères Oblats de la Baie James et sur leur rapport très favorable. Nous approuvons cette nouvelle édition du Catechisme de Persévérance, en langue orise, publié par le Révérend Père F.-X. Fafard, O. M. I., en l'année 1869.

Des gravures nombreuses et très expressives ont été ajoutées au texte ancien. Nous les approuvons aussi.

Nous demandons au Sacré-Coeur de Jésus par la Très Sainte Vierge Marie, que, dans sa miséricordieuse bonté, Il daigne accorder à cette deuxième édition la très grande diffusion possible, afin que ce Catechisme soit un aide puissant pour amener au bercail toutes les brebis errantes de la Baie James et de la Baie d'Hudson.

Donné à Hearst, Ontario, le 1er février 1894.

† JOSEPH HALLÉ,

*Evêque de Pétrée.*

Vicaire Apostolique de l'Ontario Nord.

# CATÉCHISME DE PERSÉVÉRANCE EN LANGUE ORISE

CARACTÈRES SYLLABIQUES

Pour l'usage des Sauvages des Postes d'Albany, Savern,  
Martin's Falls, etc., etc.

Baie d'Hudson et Baie James.



1924

IMPRIMERIE L'ACTION SOCIALE, LIMITÉE,  
108, rue Sainte-Anne,  
QUÉBEC

CATÉC

D:

PERSÉV

000083

L. J. C. & M. I.

PRIÈRES, CATÉCHISME  
CHEMIN DE LA CROIX  
ET CANTIQUES

A l'usage des Sauvages de Fort Hope  
de Martin's Fall's et de New Post

Δ.Υ.Α ΔΣΓΓΑΔ ΔΣ ΔΣΓΔ  
Pa 12. *from B. J. C. & M. I.*



MONTRÉAL,  
LIBRAIRIE BEAUCHEMIN LIMITÉE  
79, rue St-Jacques

1910

*COVER OF Book Inventory*  
*SECRET*

PAGE - 83 -

*PANAGRAM* → 16. Δ.Υ.Α ΔΣΓΓΑΔ ΔΣ ΔΣΓΔ

*SUBPANAGRAM* D. Δ.Υ.Α ΔΣΓΓΑΔ ΔΣ ΔΣΓΔ

R. Δ.Υ.Α ΔΣΓΓΑΔ ΔΣ ΔΣΓΔ  
Δ.Υ.Α ΔΣΓΓΑΔ ΔΣ ΔΣΓΔ  
Δ.Υ.Α ΔΣΓΓΑΔ ΔΣ ΔΣΓΔ  
Δ.Υ.Α ΔΣΓΓΑΔ ΔΣ ΔΣΓΔ  
Δ.Υ.Α ΔΣΓΓΑΔ ΔΣ ΔΣΓΔ

- 83 -

16. God's laws

- D. What is God telling us not to do by his law in the beginning?
- R. He told us not to: If we are not christian, all acts are sinful, evil practices such as, shaking tent, drumming , sweat lodge and sacrifices.

*OBJIB-CREB  
VERSION*

*TRANSLATION  
VERSION*

Part of (1A) OBJIB-CREB VERSION

-1910-TRANSLATED VERSION FROM OTIB-CASE  
- 83 -

1A

16. \_\_ God's laws

- D. Are we worthy to be baptized and go to heaven?
- R. No, we are not worthy. Person baptized is required to be a strong believer and trust God to keep his word of law.
  
- D. How many are there of God's laws?
- R. There are ten.
  
- D. Could you read God's law?
- R. Here it is: " Only one God, you are to behold him as a loving God....." page X.
  
- D. What are we commanded to do with God's law in the beginning?
- R. To believe in God, to have trust in him, to love him with all our heart. We are required to believe only to God himself.

<p>D. What is God telling us not to do by his law in the beginning?</p> <p>R. He told us not to: If we are not christian, all acts are sinful, evil practices such as, shaking tent, drumming , sweat lodge and sacrifices.</p>
---

P. 106/115

29

1924 - TRANSLATED VERSION FROM CASE

What is that when reference is being made to God as godly? It is when we praise him for having created us and for having supreme power over us.

Is God the only one that should be mentioned as being all powerful?

Yes because he has created and has power over everything. That is why it is blasphemy when one partakes in the shaking tent, drums or otherwise worshipping and placing all hopes on satan.

Is Jesus Christ godly? Of course since Jesus is God.

Is he thought of as god because he became man? Yes because there is only one Jesus. His body, his heart and his hands are of God.

Who was the first to break that law?

He who makes his god in the image of the devil by paying homage to the sun, to the stars, to the idols, he who drums, participates in shaking tent ceremonies, evil chanting, evil feasting, evil pipe ceremonies and sweetgrass all these things are of the devil. There is evil in being selfish, being greedy, in fornication as you are more in love with your sinful ways than being in love with God.

*Demonizing*

If you are sick, if you are starving, if you are depressed or if you are in need call upon God as He reigns over everything. The devil can only do evil things.

Is the wearing of religious artifacts worshipping graven images?

No! These are worn so that you may remember Jesus and his suffering and dying on the cross and his love for you.

Is one doing good when one rejects and lies about religious artifacts?

It is very bad! Because he who rejects these religious artifacts also rejects Jesus who died on the cross. He who rejects Jesus will also find himself rejected when he dies.

**TAB 3**

I, Edmund Metatawabin, residing at 77 River Road, in the First Nation community of Fort Albany, province of Ontario, do hereby solemnly declare that:

1. I am the former Chief of Fort Albany First Nation and current member/resident of this community. I swear this Affidavit to supplement the evidence that I provided to this Honourable Court in an affidavit sworn August 26, 2013, for the RFD hearings pertaining to St. Anne's IRS under the Indian Residential School Settlement Agreement (IRSSA). I have also spoken to the Court, when appearing before Mr. Justice Perell in Toronto, in June 2014 and June 2015, as an executive member of Peetabeck Keway Keykaywin (St. Anne's Residential School Survivors) Association (PKKA).
2. The survivors of St. Anne's went forward with their evidence to the Ontario Provincial Police in the 1992. As the Chief, it was my duty to report and advance the findings of the Testimonial Panel Report presented to the participants of the St. Anne's Residential School Conference/Re-Union (1992). The Testimonial Panel Committee was a Panel of professionals who conducted private testimonial gathering during the conference.
3. As the First Nation Council of Fort Albany, it was our belief that, as agents of the government, the Ontario Provincial Police represent the government. It does not matter what level of government was involved. Survivors went to the police with the details of the sexual and physical abuse we suffered while we were children at St. Anne's Residential School. Regardless what forum or process of justice would be used, survivors deserved the protection and benefit of the law. Since the Federal Residential School Policy was law, the police (RCMP) had the authority to put us in jail if we had not complied.
4. Our stories did not change, has not changed and will not change, regardless what process of the justice system is in operation. There have been many legal processes, which has been confusing to us. It was not known or conceivable to us that the OPP investigation findings, (1992 – 1996), would not be made available to the Alternative Dispute Resolution Process (2003 -2005), nor, it seems to the present Independent Assessment Process (IAP). However, the stories of the actual abuses are the same, regardless whether we tell the police or testify in the criminal or civil proceedings.
5. The truth about the abuse does not diminish simply because it is painful for government and church officials to hear.
6. I did not know that the stories given to the police and all the documentation of the abuse, had stopped going forward for survivors when the IRSSA was signed and the IAP was started. The resolution of Mushkegowuk Council dated October 22, 2015 is proof that the aboriginal leaders in our region had not been told that the evidence had not come forward and that the IAP process had violated the rights of survivors.
7. I expect honour and integrity from the federal government. When I was meeting with government officials on behalf of St. Anne's survivors, during the Alternative Dispute Resolution Process, word came that Mr. Jim Leising of Department of Justice had commented to other lawyers "we will clear this up," referring to the ADR process. We replaced him. With his flippant attitude, the Board of PKKA did not consider it appropriate within such a monumental reconciliation process. Mr. Steven Smart,

Negotiator for Ontario found more time to question and ridicule my presentations than absorb the stories of abuse. Needless to say the ADR pilot project did not work. The Board of PKKA could not take the offered "thirty pieces of silver," in exchanged for the near eradication of the Innino (Cree) Nation's beliefs and values.

8. During the 1992 Keykaywin Conference, Bishop Cadieux of the then Diocese Moosonee told the Assembly that what he had heard was hard and painful, that religious people could be part of the abuse of children. At the same time, many calls were made from the Oblate of Mary Immaculate Residence in Montreal to Elders in the James Bay area to actively discourage people from going to the OPP with their stories.
9. There has to be a balance between First Nations and the government. There has to be trust and respect and honour in our dealings.
10. But if trust is violated, and honour/respect is not shown by government officials, they should be identified and put to the same test as survivors, who have been made out to be liars in their IAP hearings, by the withholding of evidence about the abuse. In the past, federal officials failed to protect us as children from the pedophiles and abusers, and federal officials have failed us again.
11. This IAP process has not upheld our legal rights. We feel like we are outside the protection of the law.
12. The adjudicators, who are themselves paid by the federal government, claim they do not have the power to order the government and Catholic Church to comply with documentary disclosure. However, they force IAP claimants to comply or else throw out the claim. Within that scenario, the Chief Adjudicator forced St. Anne's cases to proceed before the documents were properly filed and summarized. After the government dumped thousands of documents the Chief Adjudicator did not seek support and time to summarize those documents for the adjudicators. The adjudicators could have reviewed the summary reports before each in order to fully comprehend the abuse at St. Anne's Residential School, before they questioned an IAP claimant and before federal government officials might be allowed to call the survivor a liar. In seems to me, the government lawyers are being allowed to block the evidence before finally being used in individual IAP hearings.
13. It is not up to the survivors of St. Anne's Residential School to go to the Court to seek a re-hearing. The survivors are being put to the expense of going to the Court. The Secretariat, in their desire to retain balance and equality, must make it their responsibility to look into this for St. Anne's claimants, since the government is still fighting all these court proceedings.
14. The government likely hopes the IAP process will end, or that it is impossible for St. Anne's survivors to access the Court in Toronto. The federal officials refuse to grant us any funding and threaten to seek costs against us.
15. In a conference call on December 21, 2015 in this RFD, the federal government lawyer expressed her concern that Mushkegowuk Council and myself should not be given the evidence for this RFD. Ms. Coughlan called me a "non-party". I challenged her and said



- that if I was a non-party to the St. Anne's issues, then I would just hang up. She repeated that I was a non-party. I hung up. I refuse to be treated, by a federal government lawyer, as if I have no involvement or knowledge of the legal rights of St. Anne's survivors, and/or that I do not have a right to be trusted to see the documents signed by survivors for the police or arising from criminal proceedings and from the Cochrane civil actions. The government does not own those documents. I understand that the Court granted access to the lawyers for the government and Catholic Church to these OPP documents in 2003, which survivors did not oppose. Now government lawyers in the IAP want to hide summaries of these same documents from PKKA.
16. The stories of abuse belong to the St. Anne's survivors and not the lawyers for the government or Catholic Church.
  17. St. Anne's survivors have not been given resources to access the Court. The Court should not pretend we have any balance against the combined resources of the federal government and Catholic Church. As I advised the Court, the Catholic Church and other churches were given \$25 million of taxpayer money to complete their obligations under the residential school settlement. However, groups such as PKKA were given no resources to help ensure the IAP was fulfilled.
  18. We would never have agreed to the IAP process if we thought that the lawyers would violate the disclosure obligations under the IRSSA. We would not have left each survivor up against the government and church in confidential hearings, with a false narrative that stated there was no sexual abuse at St. Anne's and false perpetrator reports.
  19. The lawyers hid all the documentation and proper reports about abuse until November 2015, and yet they called St. Anne's students liars during confidential hearings. The federal government allows the Catholic Church to not participate in the IAP hearings, but calls us liars, when they are the ones hiding the evidence.
  20. This non-disclosure has impacted our trust in government and should be investigated.
  21. Survivors of St. Anne's followed the law. During the OPP investigation, criminal proceedings, Cochrane civil actions, DR, ADR, IAP and all the other mish mash of legal proceedings, we have told our stories, over and over again, tested every time.
  22. We are entitled to public legal proceedings that will identify the current officials who are responsible for the violation of the rights of St. Anne's survivors in this IAP process. We should be allowed to test the evidence of the lawyers who hid this documentation and who allowed false reports to be filed and read by adjudicators. We should be told the reasons for their actions. I would like to question Jim Leising as to why he allowed lawyers in his office to withhold this evidence, after I negotiated in good faith with him and his colleagues.
  23. Mushkegowuk Council members and many leaders in our region, including myself, want the lawyers in the Department of Justice sued for their actions. We deserve answers in public court proceedings to why this has happened today. Every IAP claimant whose rights have been violated should have justice.

24. In my opinion, if the manner in which First Nations are treated in Canada is ever going to change, it will only come if federal officials are clear that they must uphold the law, even if political forces want to influence them otherwise, and if responsible federal officials can be identified and called upon to explain if they have violated the law.
25. There are other aspects of the IRSSA that have been adversely affected by the non-disclosure. If Health Canada had seen truthful reports about the widespread abuse at St. Anne's since 2006/2007, Health Canada should have devoted more resources to our region for counselling and support. We communicated to Health Canada at the Keykaywin Conference the need for medical and mental health support to counter act the dysfunction from child abuse, but after the OPP started to investigate, Health Canada was nervous about legal liability. The resources offered in our region have been limited, in comparison to the real need.
26. The IRS Adjudication Secretariat also should have known, since 2006-2007, the truth about abuse at St. Anne's IRS, but the government and Catholic Church withheld the documents and lied in the IAP reports. The Secretariat should have been in our region prior to the IAP deadline ensuring that St. Anne's survivors understood their legal rights to file a claim for sexual and serious physical abuse.
  
27. Many of the survivors still believe that because he/she gave his/her story of abuse to the OPP, they believed they had given their story to the government. The IAP deadline was not properly explained in our region by the Secretariat. If the Secretariat had received the truth about the widespread and horrific abuse at St. Anne's, it should have contacted each person who contacted the OPP to ensure he/she understood the deadline. Many St. Anne's Residential School survivors, who gave their story to the OPP, died after May 2005.
28. We were also not given resources to hire neutral and competent lawyers to come to in our remote communities to provide legal advice. Many survivors were told that unless they were sexually abused, most lawyers would not assume the risk of the claim. Meanwhile, the lawyers for the federal government and Catholic Church already had full knowledge of the types of physical abuse, such as forcing children to eat their own vomit, electrocution in the electric chair and public whippings by the head Priest and supervisors.
29. The credibility, presence and influence of our Elders during the education of our young continue to be undermined by the annualized, funded government programs. Teachers, although certified, are unable to communicate in the Innino (Cree) Language.
30. In order to balance the learning of our youth we run short term programs like the Youth Camp, Spring Camps, Farmers' Market and Natural Environment Excursions.
31. The Paquataskamik Rafting Excursion takes youth on a two week 300-mile Rafting (60ft. x 16 ft. raft) on the Kistachowan (Albany River). As part of their experiential learning

(earning three academic credits) they learn oral history, legends, stories from the elders as well as maintaining the 22 cemeteries along our river.

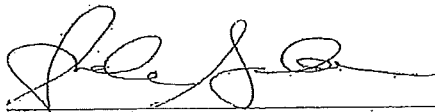
32. These local programs, fully supported by the community are not funded and we have to undergo continuous funding drives to finance our expenditures.
33. A proposal for an Elders Learning House, known to us as Shapotawan, is attached and we are asking the courts assistance to our funding request from government in the amount of \$300,000 over three years as start up to establish the Elders Learning House.
34. The federal government lawyers have challenged our credibility, and they have protected the abusers by hiding all this documentation. We deserve to know why government officials have not complied with the IAP for St. Anne's until November 2015.
35. This non-disclosure of the truth about St. Anne's needs to be addressed by the Court. We have acted in good faith and we deserve the remedies that Mushkegowuk Council has identified.

I swear and affirm that the above and foregoing representations are true and correct to the best of my Information, Knowledge and Belief.

SWORN BEFORE ME in Fort Albany First  
Nation, on February 29, 2016

\_\_\_\_\_  
*Commissioner for Taking Affidavits*

  
\_\_\_\_\_  
Edmund Metatawabin



Chief Andrew Solomon, Fort Albany First Nation

## **Elders Teaching House**

### **Peetabeck (Fort Albany)**

#### **Preamble**

Post Traumatic Stress Syndrome (PTSD) cannot be adequately healed by the use of non-native professionals alone. Today even American war veterans find it useful to attend Sweat-Lodge ceremonies to handle PTSD.

It has already been accepted by mental health professionals that the stress experienced by Residential School Survivors meets the definition and criteria of PTSD. Now that is acknowledged, we now have to search for the proper vehicle to deliver relevant teachings to damaged individuals.

The Teaching House will eventually have a building to house the administration, tools and equipment for various programs to be offered. Regional and centralized ceremonies are available at this time but, it is necessary to provide accessibility to all community members. It is understood that – in line with the teachings of our elders – individuals have the freedom to choose the format of Healing they want to pursue.

The existing Paquataskamik Program in Fort Albany came to be because of the elders' and community's desire and belief that using the Natural Environment as a base of knowledge can be both meaningful and long-lasting. Within this teaching environment academics and books take a central place. Community leadership acknowledge the change in the way Innino lifestyle has developed and that acceptance is to encourage all Natural Experiential Programs include academics as a strong component.

#### **Natural Experiential Programs**

In summary the following components of Innino (Cree) life made the culture free and independent from the other surrounding Nations. The leadership, usually led by "those with the most experience, proven worth and community acceptance," designed a society that complied with the needs of the natural environment.

1. Kwachee
  - a. The principle of Kwachee, in its original form, existed to provide security to the membership of the Innino (Cree) community.
  - b. Kwachee encourages the concept of sharing your harvest with 'the person that has been designated is your protectee,' (your double whom you ensure has

-2-

- c. enough to be in good health). You, yourself, have a person who will look after you to ensure your well-being.
- d. An investment relying on the health of each individual to maximize community well-being. "The health of my neighbour guarantees society's survival," is a short description of the Innino's Economic System. The concept of the accumulation of wealth plays against those principles. Today's First Nation individuals must deal with the contradiction of their Innino natural way of life and that of the adopted individualistic one. Now it is a test of their own faith in the teachings of their culture.

## 2. Elders and Natural Experts.

When a person receives an invitation to join the circle of elders for deliberation, then you have become an elder. Usually the headman or headwoman will be the oldest, just to give age due respect. Within all ceremonials there is a leader and usually not the oldest, strongest or most gifted but a person agreed upon by the membership.

Today Inninowak (Cree people) must deal with Canadian society's way of choosing individuals with 'sufficient means,' to fulfill leadership roles.

## 3. Justice and Citizenship

Innino Justice Program is one of repairing the breach and allowing the weak link to become strong, and once again re-take their place in society. Land and traditional healing medicine play a central role in this process.

## 4. Spirituality

It is not that each element or item in the world is sacred enough to be worshipped but, that everything placed on this world has a sacred reason to be beneficial to humanity. As children of a greater power the reason for life is not complicated and we treat the physical world humbly "for those that are not yet born."

## 5. Reserve system

- a. As a member of a First Nation we all have a band number identifying and tracking us as a member of a "band of Indians," usually on behalf of this total institution administration, called a "Reserve System."

-3-

- b. The young people do not fully understand how we are a kept Nation and are confused when we label ourselves as 'Nations who signed treaties,' when the government refuses to acknowledge that relationship.
- c. As members of the total institution we ask ourselves if young aspirations suffer because of the limited horizon. Even a doctorate does not make you free.

### **The Proposal**

The Elders lost their place in the socialization of their youth when a powerful and aggressive system arrived to take many things away from the Innino Nation. A two-pronged approach, Economically and spiritually, was enough to overcome an established land based culture. The Innino system was Kwachee, a system of truth, kindness and protection did not anticipate an opposing system of thought was to be introduced.

Kwachee is an investment. It is an investment for the future. It is an investment for survival, not in a personal sense but, on a wider, more inclusive basis. It is characterised with a belief that "the good health of my neighbour guarantee's me a good future." My survival is insured if I contribute to the continued well-being of the community's membership. Therefore, each individual is responsible to care for a particular member and share with him/her, food or goods, that has come into their possession. A healthy Kwachee system increases the fortune of all members and lessens individual stress.

The system of Kwachee lasted ten thousand years but, only took one hundred years to destroy it. The environment has closely followed the fate of the first nation people.

As is their nature the Elders accepted the change. The old adage 'let go of the shore and see where the current will take us' seemed appropriate. Surely, remembering the harsh conditions of their days, the children will have a better life. They took the lesser space and allowed their children to be given the new, foreign way.

### **Assimilation**

Children left the community to be educated within a foreign system and after a number of years, came back to the parent culture – still a child. A child in moral responsibility, caring and vision. Some, who graduated from the formal education system, returned home ... not knowing their own language. Communication with the Carriers of Wisdom, the Elders, was no longer

possible. Instead, hearing was reserved for loud music, sight for meaningless visuals on the 'magic' box and clothing was inappropriate for the climate.

The Elders now ask themselves ... 'are they bad learners or did they have bad teachers?' "They return as beggars," they comment upon discovering those young people could not hunt, trap, fix equipment, dress in suitable attire and ignorant of 'natural laws.' They watched as the will to survive was slowly drowned by the "liquid-that-makes-people-forget."

Now, through the Elders Institute, the Elders will speak and teach. They speak in a way they were taught by their Elders – not to be too obvious in their message. To assume total knowledge, to provide the answer, is not their way. They hope however, that by talking about the past and many struggles to live, they can show that the values, the ethics followed in their day are not so outdated in this new age; only the scenery has changed.

### **Background**

Colonization is the contamination of indigeneous matter by an external foreign substance forever changing the original character of the invaded host. People too, infect each other: the transfer of disease from one person to another. Ideas, too work under the same principle. An idea adopted by a group of people can spread, regardless of its authenticity or benefit to mankind. It becomes the normal lore of the community. One such idea that played a major role in the colonization of "Turtle Island" was and is the concept of Manifest Destiny.

Manifest Destiny was the term used to describe the belief (Idea) in the 1840's during the uncontrolled euro-territorial expansion due to the economic and political aggressiveness and rapidly growing population of the European into the land mass which came to be referred to as North America. In order to rationalize the unjust takeover of land from the owner, the indigeneous Nation had to be dehumanized. The ideas of Darwin were opportune and the theory of the 'survival of the fittest' justified the massacres of the original land owners. Max Muller, 1870, classified humanity into seven ascending scales, with the aboriginal on the lowest rung and the Aryan type as the highest. Guess who later used that to his political advantage. It happened then and it can happen today.

The Social Evolutionist H. K. Rustden, 1876, explained that 'survival of the fittest' means that might is right. He continues ... 'thus we invoke and remorselessly fulfill the inexorable law of natural selection when exterminating the inferior "aboriginal" ... and we appropriate their patrimony, coolly. In the Splendid Blond Beast, Christopher Simpson writes that genocide is still difficult to eradicate because it is usually tolerated, at least by those who benefit from it.

Following the era of battles and killing came the period of pacification. The confinement of the Indigenous population unto unwanted land became the means of control, while Church missionaries rushed forward to begin the process of 'civilizing' the heathen. Government officials in their desire to please the voting public (Indigenous people did not get this privilege until the 1950's) and to secure the land's resources, echoed statements like: "I want to get rid of the Indian problem. I do not think as a matter of fact, that this country ought to continuously protect a class of people who are unable to stand alone (conveniently forgetting that the Indigenous people had been on Turtle Island for thousands of years). That is my whole point. Our objective is to continue until there is not a single Indian in Canada that has not been absorbed into the body politic and there is no Indian question and no Indian Department and that is the whole object of this bill. (Duncan Campbell Scott).

The attempted "Absorption" of First Nations into the mindset of the Euro-Canadian came in the form of isolation, seclusion and exclusion. The establishment of "Reserves" for the proper confinement of the Indigenous population was followed closely by the acceptance and financing – 'dollar-per-head' - of another form of Total Institution.

### **Total Institutions**

Goffman, in his book, *Asylums*, writes: "The Total Institution is a social hybrid, part residential community, part formal organization; therein lies its special sociological interest. There are other reasons for being interested in these establishments too. In our society, they are the forcing houses for changing persons; each is a natural experiment of what can be done to the self."

The Total Institution can be a house, school, residence, incarceration centre, or in some cases, a community where persons are admitted, confined to undergo specialized training to make them conform to socially acceptable behaviours or a way of doing and saying things. What characterizes the institution is the policy inherent in each staff person, that, the public be kept on the outside. The 'inmates' (those that have been admitted) have no physical contact with any external persons, things or thoughts. The total institution has no history, philosophy or culture to give to the inmates. It is not there to give training, in the sense of the word but, rather the intent is to halt the continued socialization of those inside, of things, ideas that brought them there in the first place. The training, therefore becomes Untraining, as the ultimate goal. The person will retain the cultural background but, that background will not be encouraged or developed. Previous personality development processes are put on the shelf and the inmate undergoes new stimuli and situations.



In order to maintain uniformity and have control, it is necessary for all inmates to have the same appearance, schedule and defacement. The institution decides on the appearance of each person and proceeds upon a program to cut hair, issue institutional clothing, assign numbers for identification purposes and assign space where the person is allowed to use. Activity for all persons will be of the mundane, repetitious type. Wherein the individual had a place in the society from which they came from, the institution takes that away and there is role dispossession. It becomes necessary to strip the inmates of any form of identity which will make them unique or different from the group.

Defacement for the individual occurs, when personal items that gave people their own identity and skills, are taken away. The loss of identity equipment can prevent the person from presenting their usual image of themselves to others. The loss in personality or the halt in the development of the individual's unique personality will eventually mean the total loss of that person's character and place in the world.

Goffman summarizes the concept when he says: "When we view the different institutions in our western society, we find some that are encompassing to a degree discontinuously greater than the ones next in line. Their encompassing or total character is symbolized by the barrier to social intercourse with the outside and to departure that is often built right into the physical plant, such as locked doors, high walls, barbed wire, cliffs, water, forests or moors. These establishments I am calling Total Institutions."

The study conducted by the Assembly of First Nations, entitled Breaking the Silence, George Erasmus, Co-chair of the Royal Commission on Aboriginal People, makes the following statement, which effectively describes the residential school experiences: "Everywhere we have gone, we have been told about the impact of residential schools ... most of the stories are hearing are negative. 90% of them. Inevitably, we are told about the loss of culture, the loss of language, the loss of parenting skills, the agony of being separated from family, from community – even in the same residential school as other family members they were separated from their family members – the many, many years of being away from home, the return home, the alienation, the need to integrate into the community, the pain that people have experienced themselves, the way it was passed down ... It's a very painful experience that we have been hearing."

What Goffman referred to, as the untraining or de-culturation of 'previously personality development processes' are again being described within the residential schools, as the "loss of ..." supportive influences like family, kin, elders, language and a familiar way of life. What is different about this total institution, in this country, from the usual, is the gap in age and

cultural background of the inmates from that of the adult staff. Added to that was the 'religious based' curriculum and discipline, implemented by an unfamiliar language and personnel. The formative years of the child or personality are stolen from the parents and community and awarded to a foreign government, who sign the 'dollar-per-head' agreements with various religious denominations.

Our own experiences in residential school and our own recent individual discoveries about being members of an indigeneous culture – being people of the land – and what it entails confidence and knowledge to run Sweatlodge ceremonies. In residential school the Catholic Cathecism taught us that form of prayer was 'the works of the devil.' The concept of the Eagle Feather, Sweetgrass or the Four Directions were also considered sacrilegious and never to be mentioned. Our grade eight teacher laughed at us one day because we did not know who the Red Man was. We failed the question because, as a teacher, she never told us. Sacred legends like Wisakejahk, Nanabush, Shingabish, Wemishosh (to name a few) were absent from the curriculum and their content, meaning and relevance grew dimmer in memory each day we were incarcerated inside the St. Anne's Residential School. There are other teachings from our Elders that time made us forget and as we try, as adults, to recover them they only testify to our incompleteness.

### **The Elders Teaching House: A Program to Heal the Wounded**

Innino Elders are Masters in their own way of life. There is no question about who they are and why they are placed on Mother Earth. It is a privilege they never forget and the Sunrise Ceremony is a time to express gratitude for life. They are Masters in their lifestyle and confident in the traditions handed down through many generations.

A Master will leave the community to go to the natural environment with a light packsack of food and tools and return to the community some months later loaded with food, medicine, more tools and fur to trade. A toboggan made from natural resources, a canoe made from the wood and bark of the birch tree and snowshoes made useable from the hide of animals. An Elder will sit down with the young and words will bring to life, the adventures just had, to the delight of listeners. The Master can be male or female.

### **Shapotawan: Mode of delivering the Teachings**

In this paper, institute is used to allow the euro-canadian reader, the opportunity to recognize that this Program to Heal the Wounded is a teaching program. It contains ascending levels of learning as comprehension is acquired. Shapotawan, as the traditional learning centre, has the

familiar and contemporary concepts of admission, listening, experiential learning and graduation. Whether in life, school, excursion, the concept of Shapotawan will always have a beginning (entrance), the use of two fires to signify a beginner and an advanced learner and an exit (graduation, completion, death).

The Elder is the teacher. Shapotawan does not replace the existing education system but will complement the academic learning with experiential life learning. An example and summarized Shapotawan curriculum is attached.

The Elder transmits traditions, history, kinship, land use, world view, language, spirituality and other segments of Indigeneous knowledge. It must be accepted now that the Four Races of Humanity (Yellow, Black, Red, White) have their own areas of knowledge and each sector forms part of a whole. One prophecy states that 'when the four directions hold hands in a circle of cooperation, only then can we understand the purpose of life on Mother Earth.' Accepting the four directions and allowing a full spectrum of learning to take place will facilitate the development of a contributing personality to assist in the healthy growth of the global community.

#### **Programs Presently Operating**

- a) Youth Camp .. The Youth Camp is situated about five km from the community accessible by a gravel road. Sitting along the river, it looks to the west giving it beautiful sunsets. It is quiet, isolated, private and secure. The environment around consists of fully grown aspen, cedar, black and white spruce, birch and poplar trees. Natural tea leaves, strawberries,
- b) Land Conference ... Community hosts a meeting on the land inviting everyone and share ideas on education, health, community, youth and common contemporary experiences or problems that must be dealt with.
- c) Paquataskamik ... Annual 300-mile Rafting Trip for the youth and Elders.
- d) Cemetery Sites ... Youth Program to teach youth to honour their history and departed kin. This program is part of the Rafting Trip.
- e) Gardening ... A community endeavour to tackle the problem of high food prices due to high costs of freight and focus on food security.

f) Farmers' Market ... Because of the high freight costs and lack of fresh produce the community, with the help of many volunteers , brings fruits and vegetables to the community and hold a Farmers' Market every two weeks.

### Summary

St. Anne 's Residential School operated for seventy years. It taught the inmates fear, isolation and distrust. Separation from kin, over long extended periods diminished the bond between child and kin, especially with parents. Although this was a national disgrace,

### Budget

Annual Budget 500,000.00

Director

Administration

Program Heads

Research

Coordination

Expenses

Office Rental

Lease

Administration Office Supplies

Program Supplies

Resource People

Travel for staff and Board of Directors

Vehicles

Water Equipment

One-Time Expenditures

Summary

# TAB 4

ONTARIO  
SUPERIOR COURT OF JUSTICE

BETWEEN:

LARRY PHILIP FONTAINE in his personal capacity and in his capacity as the Executor of the estate of Agnes Mary Fontaine, deceased, MICHELLINE AMMAQ, PERCY ARCHIE, CHARLES BAXTER SR., ELIJAH BAXTER, EVELYN BAXTER, DONALD BELCOURT, NORA BERNARD, JOHN BOSUM, JANET BREWSTER, RHONDA BUFFALO, ERNESTINE CAIBAIOSAI-GIDMARK, MICHAEL CARPAN, BRENDA CYR, DEANNA CYR, MALCOLM DAWSON, ANN DENE, BENNY DOCTOR, LUCY DOCTOR, JAMES FONTAINE in his personal capacity and in his capacity as the Executor of the Estate of Agnes Mary Fontaine, deceased, VINCENT BRADLEY FONTAINE, DANA EVA MARIE FRANCEY, PEGGY GOOD, FRED KELLY, ROSEMARIE KUPTANA, ELIZABETH KUSIAK, THERESA LAROCQUE, JANE McCULLUM, CORNELIUS McCOMBER, VERONICA MARTEN, STANLEY THOMAS NEPETAYPO, FLORA NORTHWEST, NORMAN PAUCHEY, CAMBLE QUATELL, ALVIN BARNEY SAULTEAUX, CHRISTINE SEMPLE, DENNIS SMOKEYDAY, KENNETH SPARVIER, EDWARD TAPIATIC, HELEN WINDERMAN and ADRIAN YELLOWKNEE

Plaintiffs

- and -

THE ATTORNEY GENERAL OF CANADA, THE PRESBYTERIAN CHURCH IN CANADA, THE GENERAL SYNOD OF THE ANGLICAN CHURCH OF CANADA, THE UNITED CHURCH OF CANADA, THE BOARD OF HOME MISSIONS OF THE UNITED CHURCH OF CANADA, THE WOMEN'S MISSIONARY SOCIETY OF THE PRESBYTERIAN CHURCH, THE BAPTIST CHURCH IN CANADA, BOARD OF HOME MISSIONS AND SOCIAL SERVICES OF THE PRESBYTERIAN CHURCH IN BAY, THE CANADA IMPACT NORTH MINISTRIES OF THE COMPANY FOR THE PROPAGATION OF THE GOSPEL IN NEW ENGLAND (also known as THE NEW ENGLAND COMPANY), THE DIOCESE OF SASKATCHEWAN, THE DIOCESE OF THE SYNOD OF CARIBOO, THE FOREIGN MISSION OF THE PRESBYTERIAN CHURCH IN CANADA, THE INCORPORATED SYNOD OF THE DIOCESE OF HURON, THE METHODIST CHURCH OF CANADA, THE MISSIONARY SOCIETY OF THE ANGLICAN CHURCH OF CANADA, THE MISSIONARY SOCIETY OF THE METHODIST CHURCH OF CANADA (ALSO KNOWN AS THE METHODIST MISSIONARY SOCIETY OF CANADA), THE INCORPORATED SYNOD OF THE DIOCESE OF ALGOMA, THE SYNOD OF THE ANGLICAN CHURCH OF THE DIOCESE OF QUEBEC, THE SYNOD OF THE DIOCESE OF ATHBASCA, THE SYNOD OF THE DIOCESE OF BRANDON, THE ANGLICAN SYNOD OF THE DIOCESE OF BRITISH COLUMBIA, THE SYNOD OF THE DIOCESE OF CALGARY, THE SYNOD OF THE DIOCESE OF KEEWATIN, THE SYNOD OF THE DIOCESE OF QU'APPELLE, THE SYNOD OF THE DIOCESE OF NEW WESTMINSTER, THE SYNOD OF THE DIOCESE OF YUKON, THE TRUSTEE BOARD OF THE PRESBYTERIAN CHURCH IN CANADA, THE BOARD OF HOME MISSIONS AND SOCIAL SERVICE OF THE PRESBYTERIAN CHURCH OF CANADA, THE WOMEN'S MISSIONARY SOCIETY OF THE UNITED

CHURCH OF CANADA, SISTERS OF CHARITY, A BODY CORPORATE ALSO KNOWN AS SISTERS OF CHARITY OF ST. VINCENT DE PAUL, HALIFAX, ALSO KNOWN AS SISTERS OF CHARITY HALIFAX, ROMAN CATHOLIC EPISCOPAL CORPORATION OF HALIFAX, LES SOEURS DE NOTRE DAME-AUXILIATRICE, LES SOEURS DE ST. FRANCOIS D'ASSISE, INSITUT DES SOEURS DU BON CONSEIL, LES SOEURS DE SAINT-JOSEPH DE SAINT-HYANCITHE, LES SOEURS DE JESUS-MARIE, LES SOEURS DE L'ASSOMPTION DE LA SAINTE VIERGE, LES SOEURS DE L'ASSOMPTION DE LA SAINT VIERGE DE L'ALBERTA, LES SOEURS DE LA CHARITE DE ST.-HYACINTHE, LES OEUVRES OBLATES DE L'ONTARIO, LES RESIDENCES OBLATES DU QUEBEC, LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE LA BAIE JAMES (THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF JAMES BAY), THE CATHOLIC DIOCESE OF MOOSONEE, SOEURS GRISES DE MONTREAL/GREY NUNS OF MONTREAL, SISTERS OF CHARITY (GREY NUNS) OF ALBERTA, LES SOEURS DE LA CHARITE DES T.N.O., HOTEL-DIEU DE NICOLET, THE GREY NUNS OF MANITOBA INC.-LES SOEURS GRISES DU MANITOBA INC., LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE LA BAIE D'HUDSON - THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF HUDSON'S BAY, MISSIONARY OBLATES - GRANDIN PROVINCE, LES OBLATS DE MARIE IMMACULEE DU MANITOBA, THE ARCHIEPISCOPAL CORPORATION OF REGINA, THE SISTERS OF THE PRESENTATION, THE SISTERS OF ST. JOSEPH OF SAULT ST. MARIE, SISTERS OF CHARITY OF OTTAWA, OBLATES OF MARY IMMACULATE -ST. PETER'S PROVINCE, THE SISTERS OF SAINT ANN, SISTERS OF INSTRUCTION OF THE CHILD JESUS, THE BENEDICTINE SISTERS OF MT. ANGEL OREGON, LES PERES MONTFORTAINS, THE ROMAN CATHOLIC BISHOP OF KAMLOOPS CORPORATION SOLE, THE BISHOP OF VICTORIA, CORPORATION SOLE, THE ROMAN CATHOLIC BISHOP OF NELSON, CORPORATION SOLE, ORDER OF THE OBLATES OF MARY IMMACULATE IN THE PROVINCE OF BRITISH COLUMBIA, THE SISTERS OF CHARITY OF PROVIDENCE OF WESTERN CANADA, LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE GROUARD, ROMAN CATHOLIC EPISCOPAL CORPORATION OF KEEWATIN, LA CORPORATION ARCHIEPISCOPALE CATHOLIQUE ROMAINE DE ST. BONIFACE, LES MISSIONNAIRES OBLATES SISTERS DE ST. BONIFACE-THE MISSIONARY OBLATES SISTERS OF ST. BONIFACE, ROMAN CATHOLIC ARCHIEPISCOPAL CORPORATION OF WINNIPEG, LA CORPORATION EPISCOPALE CATHOLIQUE ROMAINE DE PRINCE ALBERT, THE ROMAN CATHOLIC BISHOP OF THUNDER BAY, IMMACULATE HEART COMMUNITY OF LOS ANGELES CA, ARCHDIOCESE OF VANCOUVER - THE ROMAN CATHOLIC ARCHBISHOP OF VANCOUVER, ROMAN CATHOLIC DIOCESE OF WHITEHORSE, THE CATHOLIC EPISCOPALE CORPORATION OF MACKENZIE-FORT SMITH, THE ROMAN CATHOLIC EPISCOPAL CORPORATION OF PRINCE RUPERT, EPISCOPAL CORPORATION OF SASKATOON, OMI LACOMBE CANADA INC. and MT. ANGEL ABBEY INC.

---

**AFFIDAVIT OF REBECCA FRIDAY**  
**DEPUTY GRAND CHIEF, MUSHKEGOWUK COUNCIL**  
 sworn February 24, 2016

---

I, Rebecca Friday, Deputy Grand Chief of Mushkegowuk Council (MC), of the First Nation of Kashechewan, in the province of Ontario, MAKE OATH AND SAY:

1. I am the Deputy Grand Chief of MC, having been elected to my position in August 2015. In this position, I am responsible for the health portfolio, including mental health needs. This is in addition to my responsibility for other portfolios of MC for the First Nations people in our region. I am a survivor of IRS myself.
2. MC is governance body for 7 First Nations in Ontario that mostly border James Bay, Hudson Bay and west of James Bay. The First Nations are Attawapiskat, Kashechewan, Fort Albany, Moose Cree, Taykwa Tagamou, Chapleau and Missanabie.
3. We need Canada to acknowledge that our way is the best way to help our people eliminate the harms flowing from the IRS policy of the past. We need our views to not only be respected, but be implemented with appropriate funding.
4. Prior to being Deputy Grand Chief, I was the mental health and cultural support worker in First Nation of Kashechewan for over 10 years. I was the only professional mental health worker in my community, of over 2000 people during that time. The range of mental health issues facing our members, over at least four generations, is complex.
5. For MC, a large majority of the members of our First Nations who are age 48 and older were forced to attend Indian Residential School (IRS) under federal policy. St. Anne's IRS was operated within our territory for many generations of aboriginal children, by Catholic church authorities.
6. The great grandparents and grandparents in our region went to IRS's. The impact of not having been raised by their parents and not knowing how to parent, in addition to suffering abuse, caused significant social/mental issues such as violence, domestic violence in homes, sexual abuse (of males and females), post traumatic stress disorder, alcohol and drug abuse, and more. Abusive conduct that was learned in the IRS' has been repeated. The third and fourth generations in our communities are still affected and suffering intergenerational harms and trauma. The rate of suicide in our communities is profound, particularly in the third and fourth generations.
7. In terms of the mental health issues suffered by members who attended the IRS's, our understanding of the IAP process came very late in our region. We heard the apology from



the Prime Minister, but we did not have people coming into our region to explain what this legal process was about. As mental health workers, we did not get additional training or information.

8. Lawyers came into our region and said that due to the changes in the government policies, the lawyers only wanted to talk to people who had been sexually abused or suffered a broken bone. We got mixed messages from lawyers about what the government would pay for. No one from the IRS Adjudication Secretariat came to our region, as far I know.

9. The IAP process finally gave some people insight into connecting their behaviour and mental problems, to the abuse suffered as children in the IRS'.

10. Throughout the entire IAP process, I have been providing support and treatment to people who were going through this legal process of telling their stories of abuse and what it has done to their lives. In addition, some of my family members and myself went through the IAP process and I provided support to my family members.

11. My parents went to St. Anne's IRS and many people in our community went to that school. In the context of providing mental health support, I became acutely aware of the widespread sexual and physical abuse of the children at St. Anne's IRS.

12. The IAP put a lot of pressure on the limited mental health professionals in our region, We have only one person doing this work in Peawanuck, Attawapiskat, Kashechewan, Fort Albany and a few more in Moosonee at the mental health clinic. Our regional hospital is located in Moose Factory.

13. It is very expensive for our members to travel outside our communities to access professional psychologists or other professionals. We do have visiting psychiatrists, but mental health support is limited.

14. Health Canada did not provide extra resources for counsellors, psychologists or psychiatrists to come into each community, despite the high levels of mental health issues arising out of widespread abuse at St. Anne's IRS. Some First Nations such as Fort Albany, have devoted resources to hiring psychologists to provide counselling, but not all First

Nations have had resources to do so. The other immediate needs of each First Nation, such as housing shortages, puts aside mental health funding and programs. Chief Theresa Spence of Attawapiskat First Nation engaged in a hunger strike in Ottawa, to bring attention to the needs our communities. Every year, our communities are plagued by flooding and E. coli water issues.

15. Under the IAP, Health Canada would only approve psychologists (PhD) to provide mental health support. None of the people, like myself, who live in our region and who provide support are PhD psychologists, so none of us were approved to provide the counselling that was supposed to be provided under the settlement agreement. The university education requirements of Health Canada create barriers, as compared to the college education that we are able to access and achieve. Even a Bachelor of Social Work is not recognized, because Health Canada wants a Masters level.

16. If a former IRS student in our region wanted to seek Health Canada counselling, the former IRS student had to call a toll free number for Health Canada. Then, the person on the phone would tell the former IRS student to call a list of psychologists in the City of Timmins, to find a psychologist who had capacity. That was only for the first appointment to be assessed. It took a lot of courage to make that call by a former IRS student. Many times, I would be told that the former IRS student could not find any psychologist who had any capacity in Timmins, or the former IRS student would just give up after a call or two.

17. Instead of Health Canada taking the name of the former IRS student and finding an available counsellor, Health Canada made the former IRS students do the phoning to find a psychologist with capacity for a new client. Language barriers were frequently encountered, just for these phone calls.

18. If a psychologist could be found and the psychologist agreed the person needed counselling, then Health Canada required the psychologist to prepare and submit a further written application for funding, even though the person was a former student of an IRS. A long delay would be experienced while some other officials in Health Canada would decide if funding would be granted for that person. Some people were turned down. If approved, many months or even years later, the counselling might start.

19. When the former IRS student got counselling, the fact that the psychologists could not speak Cree created more barriers to healing. There would be elders over age 60 who could not speak any or much English, and/or the translation provided may not be acceptable. Translation, with a third person in the room, inhibits treatment. There is great worry on the part of elders that the translator might tell these very personal stories and details about problems experienced to someone else.

20. The process for healing seems to best unfold if the former IRS student attends counselling with the psychologist and talks to the point that the student acknowledges his/her own pain. The psychologists often prescribe medication, which may help in the short term, but can numb the pain and mask the trauma. The former student needs to cry and release the pain rather than holding it all inside, which was beaten into the students in the IRS's. The emphasis by the psychologist is on the cognitive functioning, which is an important step, but thereafter, the hands-on healing is then best completed inside our communities by culturally appropriate healing programs or events.

21. Health Canada has been fighting us in providing proper funding of cultural support and healing. Their approach is to medicate.

22. Aboriginal health professionals such as myself, have already been engaged in our communities, trying to mend and improve the lives of the people, with very limited resources. We were not given funding to train more cultural support workers who will live and work inside our communities. We are too few people trying to address so many mental health issues arising from the IRS policy.

23. The needs in our region for support has been huge, and the IAP process has released the stories and emotions, but there have been insufficient resources to assist each individual IAP claimant.

24. On September 5, 2014, Suzanne Desrosiers and Fay Brunning organized a meeting of the Health Canada approved psychologists in Timmins and the cultural support workers from WAHA, at the office of Suzanne Desrosiers in Timmins, Ontario. In that meeting, we learned that the psychologists were reduced in number, or some were eliminating/reducing IRS

counselling in his/her practices, without replacement. The psychologists were spending a lot of time to prepare lengthy paper applications, to justify funding to Health Canada, despite the known need. Our work as cultural support workers was not being recognized. Health Canada was complaining about having spent over \$1 million for travel costs for our members to get counselling in the city.

25. Fay Brunning communicated with the lawyers for Health Canada, and eventually, the need for the psychologists to file applications for funding approval was eliminated by Health Canada in 2015. That increased the capacity of the psychologists to devote more time to counselling which really helped. Those communications were available to me and the other mental health support workers. We all coordinated our efforts to help Health Canada officials realize the urgency and breadth of the mental health needs that we were trying to address.

26. After years of lobbying, Health Canada finally agreed to fund a traditional program for improved healing in our region.

27. Finally, as cultural support workers, we received funding to attend the IAP hearings directly and to try to visit the IAP claimants before the IAP hearing and to follow up. All cultural support workers are bilingual in Cree and English. Healing is best achieved when the support worker/counsellor can speak the language of our clients. We know the aboriginal programs and events that are scheduled and can offer those options to the IAP claimants.

28. There must be a big effort to try to stop the IRS behaviour from continuing into the future. Our elders have been deprived of their role, because the IRS system and of the abuse they suffered. The young people in our communities need the strong and confident presence of their grandparents and great grandparents. The grandparents and great grandparents need to act like elders and relearn the traditional teachings. To restore our communities and our place in Canada, we need to help restore self-respect in the elders. The value of raising children needs to be restored in our communities. Holistic healing circles within our communities needs to be strengthened. There should be certainty for resources for this healing and restoration of our culture for the future.

29. At the Annual General Meeting of MC, we passed a resolution in October 2015, that is now shown to me and attached hereto as **Exhibit A**. The Chiefs and Deputy Chiefs talked about ongoing emotional impact of the IAP process on the mental health of former IRS students, some of which were not believed in their hearings. The hiding of documents about abuse at St. Anne's IRS by the federal government lawyers was discussed, in the context of the violation of the rights of the people who had been abused, and the violation of the trust that our communities had put into the truth and reconciliation that was to come from the settlement agreement.

30. We discussed some of the programs that are underway and working in our communities, but without sufficient funding. For MC, our funding was cut in half in 2014/2015, from \$1 million to \$500,000 for programs. So, in the face of additional needs arising from the IAP process for mental health support programs, the funding has been cut. For instance, I have no funding to hire a much needed mental health policy advisor to coordinate and maintain our existing programs and to plan for the future.

31. I have spoken numerous times with Edmund Metatawabin in relation to bringing forward the huge mental health needs in our region due to the widespread abuse of children particularly at St. Anne's IRS. MC has asked him to take forward to the Court, our disapproval of the hiding of the abuse at St. Anne's IRS and the breach of our trust.

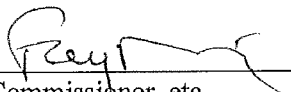
32. Mary Jane Wabano, the mental health support worker in Peawanuck, has given her ideas for mental health support for St. Anne's survivors, which are now shown to me and attached hereto as **Exhibit B**.

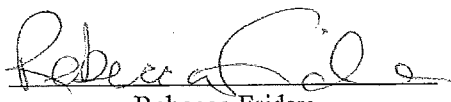
33. Theresa Sutherland is another cultural support worker in our region. She has developed, with other community volunteers, a youth camp just outside of Fort Albany. It builds upon the seven teachings of our grandfathers and teepee teachings by the grandmothers. Elders come forward to speak and support the youth and provide the teachings of our ancestors. Families set up camp along the Albany River, and there is a cooking tent, campfire circle and weekend programs to teach/learn.

34. We are trying to stop the suicides, but also to bring back pride in our elders.

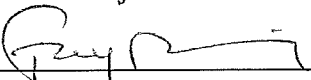
35. I swear this affidavit in support of the resolution of Mushkegowuk Council dated October 22, 2015 and to support improved mental health funding of aboriginal directed healing programs for survivors of IRS such as St. Anne's.

SWORN BEFORE ME at the City of  
Ottawa, in the province of Ontario this  
24 day of February, 2016.

  
\_\_\_\_\_  
A Commissioner, etc.

  
\_\_\_\_\_  
Rebecca Friday

This is Exhibit A to the Affidavit of  
Rebecca Friday sworn February 24, 2016

  
\_\_\_\_\_  
A Commissioner for taking Affidavits, etc.



# MUSHKEGOWUK COUNCIL

Box 370

Moose Factory, On. P0L 1W0

Tel: 705-658-4222

Fax: 705-658-4250

Mushkegowuk Council  
30<sup>th</sup> Annual Mamowihitowin

Resolution No. 2015-10-22

Attawapiskat  
First Nation

**Moved by:**  
Chief Andrew Solomon  
Fort Albany First Nation

Kashechewan  
First Nation

**Seconded by:**  
Chief Keeter Corston  
Chapleau Cree First Nation

Fort Albany  
First Nation

Moose Cree  
First Nation

Taykwa Tagamou  
Nation

**Carried**

Chapleau Cree  
First Nation

Certified copy of a resolution passed  
on October 22<sup>nd</sup>, 2015

Missanabie Cree  
First Nation

Jonathan Solomon, Grand Chief

October 22<sup>nd</sup>, 2015  
Missanabie Cree First Nation

## St. Anne' IRS Survivors - Assurance of Non-Violation of IAP Process

**WHEREAS** on December 15<sup>th</sup>, 2006, a Judgment Order was issued in Canada for settlement of a national class action law suit against the Federal Government and churches to recognize and compensate former students of Indian Residential Schools (IRS) in Canada;

**AND WHEREAS** the majority of members of the First Nations that comprise Mushkegowuk Council who are age 45 and older, are survivors of various IRS that operated in the James Bay region, such as St Anne's Residential School in Fort Albany; some members have made IAP claims under the class action settlement for sexual and/or physical abuse while he/she was a child attending St. Anne's IRS;

**AND WHEREAS** since at least 1992, ongoing efforts were made by members under the leadership of former Chief Edmund Metatawabin, to culturally, medically and legally address the widespread sexual and physical abuse of children who were forced to attend at St. Anne's IRS, which operated next to Fort Albany First Nation. The path for justice included the Keykaywin Conference in Fort Albany First Nation in 1992, a special investigation by the Ontario Provincial Police (OPP) from 1992 to 1997, criminal charges and



trials against some of the former supervisors who were still alive from 1997 to 1999; and civil actions out of Cochrane, Ontario from 2000 to 2005.

**AND WHEREAS** the Federal Government had been permitted by Court Order in August 2003, to review the OPP investigation documents and to make copies of documents about abuse to St. Anne's former students, plus the Federal Government obtained copies of public criminal proceedings against former supervisors of St. Anne's;

**AND WHEREAS** it has come to the attention of the Mushkegowuk Council, including through Ms. Fay Brunning, a lawyer for a number of members who have made IAP claims, that the Federal Government was proceeding with IAP hearings without the proper disclosure of evidence about abuse at St. Anne's IRS, and decisions had been rendered by adjudicators without the benefit of the evidentiary disclosure;

**AND WHEREAS** because of this failure by the Federal Government to provide disclosure from 2007 until now under the IAP process, some IAP claimants of St. Anne's Indian Residential School have had his/her IAP claim dismissed or received an inferior award because of this Non-disclosure by the Federal Government

**WHEREAS** Ms. Brunning will be advancing a Request for Direction to the Court for a re-hearing, wherein the claimant has been denied any compensation whatsoever for sexual abuse by a priest known to be a serial sexual abuser, and whom the Federal Government lawyers have been arguing had not been at St. Anne's Residential

School during the relevant time, but the disclosure ordered by the Federal Government as a result of the Court Order of Justice Perrell dated January 14, 2014 proves otherwise.

**AND WHEREAS** Edmund Metatawabin who is the representative of PKKA, an organization that represents the non legally represented claimants and who has assisted in the Requests for Directions of the Court would be the appropriate person to speak to the Court on behalf of Mushkegowuk Tribunal Council to inform the Court of the injustices that continue to be happening in the IAP process as it relates to the survivors of St. Anne's Residential School.

**THEREFORE BE IT RESOLVED THAT:**

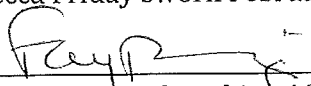
- 1) Mushkegowuk Council supports a Request for Directions and resolves as follows:
  - a) to request that former Chief Edmund Metatawabin bring forward a Request for Directions to the Court on behalf of the former students of St. Anne's IRS concurrent with the Request for Directions being brought by Fay Brunning for re-hearing; and
  - b) to ask the Court directly for the real remedies that are needed, to ensure this IAP process respects the legal rights and provides justice to each former student of St. Anne's, based upon the proper documentary record, including the following:
    1. Suspend the release, under

the settlement agreement, to be given to the Federal Government and Catholic Entities that ran St. Anne's IRS until the following steps are done;

- a. Provide funding to PKKA organization that represents the survivors of St Anne's for salary for two full time staff, travel and operating expenses until completion of all St. Anne's claims;
- b. Appoint a short list of competent IAP lawyers to handle all IAP claims for St. Anne's IAP claimants on the full documentary record;
- c. Each approved lawyer will be given all the St. Anne's documents plus narrative and perpetrator reports and source documents (only blacked out as per the recent order of the Courts);
- d. The approved lawyers will be reimbursed travel expenses to attend in the region, conduct public information meetings and outline generally the re-hearing process;
- e. Have every IAP claim (already heard and not yet heard) from St. Anne's reviewed;
- f. Have notice given to each IAP claimant that his/her rights to documentation was violated by federal government and Catholic Church;
- g. Each former student will be allowed up to \$2,500 plus HST to consult a lawyer and each former student will be allowed to decide whether to seek a re-hearing;
- h. If a re-hearing is being sought by the former student of St. Anne's, the Secretariat should set up a process to make an application to the Judge for a re-hearing, to do so in writing only with full confidentiality protection;
- i. Extend the deadline date for filing an IAP claim arising out of St. Anne's IRS, to those people who gave a signed statement to the police but did not file an IAP claim;
- j. Contact be made, with the assistance of PKKA, with every former student who provided a signed statement to the OPP in the 1990's (or the estates of anyone who died after May 2005) to advise him/her to seek legal counsel about a possible IAP claim. Provide \$2,500 plus HST to a lawyer to provide independent legal advice to that former student (or their estate).

- k. Prohibit the involvements of Department of Justice lawyers and the current lawyers for the Catholic entities, from all future St. Anne's IAP claims and have the Attorney General of Canada appoint new outside lawyers to participate in the IAP hearings for all St. Anne's claims.
2. Alternatively, to allow a class action against the Department of Justice Lawyers and the lawyers for the Catholic entities that ran St. Anne's for negligence, and interference with the justice system.

This is Exhibit B to the Affidavit of  
Rebecca Friday sworn February 24, 2016

  
\_\_\_\_\_  
A Commissioner for taking Affidavits, etc.

## **Mental Health Support for St. Anne's School Survivors**

Mary-Jane Wabano  
WAHA Mental Health Program  
Peawanuck Nursing Station  
Peawanuck, ON

### **Culturally:**

We need treatment programs/healing centre built for St Anne's School Survivors in our area. Where they have intake up to 6 weeks for women, men or families, youth or even as abusers. There would be intake schedules all year long. Have traditional counsellors, female, men counsellors. Have ceremonies and traditional activities for clients.

### **Hire a local person for IRS support:**

We need more funds to have IRS programs in the community. Local programs would benefit the whole community. Support worker can run healing, sharing circles in the community, more support at community level.

A lot of people do not like to travel for appointments for IRS support. It causes stress to leave home and be in different environment. \$10,000.00 is not enough to supportive counselling. Extended families need counselling and support too once healing work starts for the survivor once completed hearing.

We do get Traditional Healing Program within James Bay are: an elder visits communities for 5 to 7 days in the communities at a time. It's not enough for monthly visits. We need someone locally to hold activities and provide support and counselling.

### **As a survivor at St. Anne's School:**

What was taken away from you as a child, will never have it back, and that's security, safety and trust. That child is broken forever.... As you get old, you will get triggers when you hear someone share, fear kicks in when you think about your children. So it's a life time effect as a survivor.

Healing work needs to continue.

