

IN THE MATTER OF THE PUBLIC ORDER EMERGENCY COMMISSION

CLOSING SUBMISSIONS OF
WINDSOR POLICE SERVICE

Date: December 9, 2022

SHIBLEY RIGHTON LLP
Barristers and Solicitors
700-250 University Avenue
Toronto, ON
M5H 3E5

Thomas McRae
thomas.mcrae@shibleyrighton.com

Heather Paterson
heather.paterson@shibleyrighton.com

416-214-5200
Fax: 416-214-5400

Lawyers for the Windsor Police Service

Introduction

1. These are the closing submissions made by the Windsor Police Service (“WPS”) to the Hon. Paul Rouleau in the Public Order Emergency Commission. They focus on the circumstances of and resolution to the Ambassador Bridge Blockade which commenced on February 7, 2022 and concluded just after midnight on February 14, 2022 when the Ambassador Bridge was open to vehicular traffic again.

2. In summary, the Blockade of the Ambassador Bridge was resolved quickly while ensuring that police operations were proportional, measured, *Charter*-compliant and appropriate. When attempts at a negotiated resolution failed to resolve the blockade it became necessary to develop and deploy a public order operation. Since the WPS does not have its own Public Order Unit, appropriate resources were requested from the Ontario Provincial Police (“OPP”), the Royal Canadian Mounted Police (“RCMP”) and other municipal police services. These resources arrived quickly, particularly considering how thin police resources were stretched across the province. From the time of the formation of the unified command team in Windsor it took less than 24 hours to develop and implement a Public Order enforcement plan. All in all, the Windsor enforcement operation was a success in that there was no loss of life or serious injury to any member of the public, the protestors or police or any notable property damage. In the words of Prime Minister Trudeau, the “Windsor operation was outstanding.”¹

3. Notwithstanding the successful operation to clear the protestors and reopen the Ambassador Bridge, the Windsor Police Service recommends that an agreement or plan be put in place that clearly delineates the responsibilities of the different orders of government, particularly with respect to prevention, mitigation, preparedness, response and recovery, in matters concerning the maintenance and security of international borders and other critical infrastructure so as to ensure a faster and more accessible response should an event like this occur in the future.

Police Services in Windsor, Ontario

4. Three police services have a presence in the City of Windsor:

(a) the WPS, which has responsibility for municipal policing within the boundaries of Windsor,

(b) the Ontario Provincial Police (“OPP”) which has a presence on the provincial highways leading into Windsor, and includes the Herb Gray Parkway which is an extension from Highway 401 to the new (still-not-open) Gordie Howe Bridge, and

¹ Transcript of the Examination of the Right Honourable Justin Trudeau conducted November 25, 2022, p. 167

(d) the Royal Canadian Mounted Police (“RCMP”), which has nothing to do with municipal policing. Superintendent Crowley’s nearest RCMP contact during the Ambassador Bridge Blockade was a border integrity officer in London, Ontario named Inspector Kevin McGonigal.

When an incident occurs on the Canadian side of the Ambassador Bridge, the WPS responds.²

Circumstances Prior to the Ambassador Bridge Blockade of February 7, 2022

5. The Windsor Police Service is a very busy police service.³ In addition to its ordinary duties, for months prior to the Ambassador Bridge Blockade the WPS was dealing with slow roll protests all over Windsor on a weekly basis but - until the Blockade - nothing that had targeted the Ambassador Bridge. They would typically last two to three hours, the protesters were generally cooperative, and the WPS would reach out to the organizers.⁴ Although unnecessarily slow driving was contrary to the *Highway Traffic Act* (Ontario), the WPS — as well as other police services in the province — were trying to find a balance with this and peoples’ *Charter* right to protest. The WPS felt it was better to work with protesters to facilitate their slow rolls: doing this maintained public safety, and avoided escalation.⁵

6. WPS received and reviewed Hendon Reports. They were the WPS’s best source of intelligence. On January 31, 2022 the WPS received a Hendon Report⁶ which suggested that truck drivers in the US planned to block the American side of the Ambassador Bridge, to coincide with Canadian drivers blocking the Canadian side. There were reports of numerous bridges possibly being blocked. Superintendent Crowley discussed this issue with the Police Emergency Preparedness Committee of the Ontario Association of Chiefs of Police; although more specific information was not available at the time, the WPS did keep this intelligence at the ready as the situation developed. Notably, the protests in Ottawa and Toronto were at the forefront at the time.⁷

² Transcript of the examination of Deputy Chief Jason Crowley conducted November 7, 2022 (the “Crowley Examination”), pp 172, 184

³ Crowley Examination, p. 242

⁴ Crowley Examination, pp 172-173

⁵ Crowley Examination, pp 177-178

⁶ OPP00000819

⁷ Crowley Examination, pp. 173-176

7. On February 4, 2022 a Hendon report⁸ was received which reported, from Open Source Information (Media and Social Media), that commercial truck drivers may conduct slow rolls near the Ambassador Bridge over the next three days, and may attempt to block the bridge on February 7, 2022. This was the first time that there was a specific date for a potential blockade. WPS continued to work with the slow roll group as they had in the past but, by Sunday the 6th, the WPS started to gain more information about February 7th being the date the Ambassador Bridge was to be blocked.⁹ However, the problem remained that the WPS had no intelligence as to how the bridge might be blocked. The geography of the Ambassador Bridge is very porous, with side streets and multiple accesses to the bridge - not just one-way-in and one-way-out. The WPS considered different options, however nothing was finalized due to a lack of specific information and multiple variables.

8. Superintendent Jason Crowley (as he was then) was put in charge of the WPS's response to the expected slow roll. He met with WPS patrol inspectors and asked for an Operational Plan given that this slow roll seemed to be gaining more traction and seemed to be a bigger entity than they had been dealing with on prior occasions. Also because of this Superintendent Crowley included members of the Canadian Border Services Agency ("CBSA"), the owner of the bridge and WPS Intelligence Unit in the considerations.¹⁰ Over the weekend of February 4-6, 2022 Superintendent Crowley reached out to Windsor Fire Chief Steve Laforet, Bruce Crowder of Windsor Emergency Medical Services and Inspector Kevin McGonigal, the RCMP border integrity officer who was stationed in London, Ontario.¹¹ Everyone was just making plans, doing the best that they could do to support the police as they tried to mobilize the assets required to provide support for the City. It was obvious, though, that a police response would be required.¹²

9. RCMP Inspector McGonigal told Superintendent Crowley that RCMP resources were spread thin because of threats to other border crossings in the province, but acknowledged that the RCMP had people on call and would assist as needed or as could be supplied. Neither the RCMP nor the CBSA were taking steps to prepare for a blockade at the time. CBSA did not have an operational plan, and noted that - as in Coutts, Alberta - any blockade would not likely be on the border property but down the road. However, CBSA tried to help WPS in any way it could (such

⁸ OPP 00000825

⁹ Crowley Examination, pp 178-179

¹⁰ Crowley Examination, pp 176-177.

¹¹ Crowley Examination, pp 180-181 and 184

¹² Examination of Mayor Drew Dilkins conducted November 7, 2022 (the "Dilkins Examination), p. 27

as installing cameras¹³).¹⁴

10. At the same time, Windsor Police Chief Mizuno reached out to OPP Commissioner Carrique seeking assistance from the two OPP detachments in the Windsor area, as well as a Public Liaison Team.¹⁵ As a result of this call, Superintendent Crowley was introduced by email to Superintendent Dana Earley of the OPP.¹⁶

11. The difficulty in developing a plan was that intelligence was very limited. From the information the WPS had they expected a ‘bearhug’ around the bridge, where vehicles would travel the roads that encircled the bridge property and then perhaps stop. WPS therefore tried to put in place plans to mitigate this.¹⁷ The first such plan is found at WPS000001883. However, the WPS had no intelligence of a specific action by the protesters with respect to which they could plan a specific response; instead the WPS tried to develop a general response.¹⁸ WPS had even considered closing Highway 401 coming into Windsor, but this option was rejected. As of February 6, 2022 the WPS was of the view that if it could control the intersection around the Ambassador Bridge and could limit vehicle traffic through it, WPS would be able essentially to control access to the bridge.¹⁹

12. On the evening of Sunday February 6, 2022 there was a slow roll protest at Mic Mac Park in Windsor. This is the first time that there was a noticeable difference from earlier slow rolls. There were more protesters, and they appeared to be more aggressive than in previous protests. For the first time, WPS officers had to disengage from some protesters because of the aggression the protesters had showed. Seeing what happened in Ottawa and Coutts, the WPS were trying to avoid escalating matters but trying to work with the protesters as they had in prior slow rolls. At the same time, the WPS had received information of a potential gathering the next morning at the Comber Rest Stop, on Highway 401 about twenty-five minutes outside of Windsor. Both the WPS and the OPP planned to be present and to try to engage the truckers to learn what their intentions were.²⁰

13. At the Comber Rest Stop on February 7, 2022 the situation was different than in

¹³ Examination of John Ossowski (CBSA) conducted November 16, 2022, pp 8-9

¹⁴ Crowley Examination, p. 184

¹⁵ Crowley Examination, p. 181

¹⁶ Crowley Examination, p. 182

¹⁷ Crowley Examination, p. 177

¹⁸ Crowley Examination, p. 182

¹⁹ Crowley Examination, p. 185

²⁰ Crowley Examination, p 185-186

Ottawa. There were trucks, but they were not all semi-tractor trailers. There were many personal vehicles and pick-up trucks with flags. They could not determine who protesters were, other than those with flags. There was information that there were convoys sitting on concession roads off of Highway 401, hiding and waiting to join the trip down Highway 401, but this never materialized. Stopping a convoy just was not as easy as it sounded.²¹

The Ambassador Bridge Blockade Generally

14. As of February 7, 2022, police resources were spread thinly across the province. At this point the Ambassador Bridge was not blocked. Superintendent Crowley kept in contact with Inspector Kevin McGonigal of the RCMP and Superintendent Earley of the OPP, inquiring after the availability of assistance if necessary. Generally, the WPS was told to let them know what they needed, and they would try to make arrangements.²²

15. At the beginning of the Blockade of the Ambassador Bridge, WPS managed it from a project room at Windsor Police Headquarters. Shortly thereafter, the WPS established an Emergency Operations Centre (“EOC”) and expanded the command team. This included internal resources from WPS’s Major Crime unit, intelligence officers and logistics. Initially the only external party invited to be part of the command team was the CBSA, which supplied personnel to create a direct link, and also provided intelligence and information.²³

16. Consistent with the Critical Incident Command model, at all times both Chief Mizuno and Deputy Chief Bellaire of the WPS respected the EOC’s autonomy and did not interfere with the critical incident commanders’ decisions. At no time did the Windsor Police Services Board see, nor did it request to see, the operational plan developed in respect of the Ambassador Bridge Blockade.²⁴ Nor was there any political involvement in their operational decisions concerning the Ambassador Bridge Blockade.²⁵ The responses to the Mayor’s political requests of both Ontario and Canada, however, were very good.²⁶

17. In the first days of the Ambassador Bridge Blockade - when WPS was principally relying on its own resources – the OPP provided Public Liaison Team (“PLT”) officers who enjoyed

²¹ Crowley Examination, pp 188-189

²² Crowley Examination, pp 189-193

²³ Crowley Examination, p. 193

²⁴ Dilkins Examination, pp 39-40

²⁵ Crowley Examination, p. 274 and p. 289

²⁶ Dilkins Examination, p. 40

some success. The WPS had no PLT officers of its own, and the WPS experienced difficulty in negotiating with the protesters given their fractious leadership and the different groups involved therein. For example, the WPS would negotiate for the opening of some a lane and then a different group of protesters would come and re-form a blockade. The OPP's PLT had built up trust through relationships developed at protests across the province and were able to negotiate. It was all about communication and education between the PLT and the protesters, and the PLT did a fantastic job.²⁷

18. A fair number of the protesters were local folks, but there were a fair number of them who were not from Essex County, and had come in from elsewhere to participate.²⁸ No protester admitted that the protests in Ottawa and Windsor were coordinated, but it can be fairly inferred that at the very least the Windsor protest was inspired by the Ottawa protest. In that regard, at least one protester had a brief exchange with Pat King (in Ottawa) to ask if there was any sort of connection between what was happening in Windsor and what was happening in Ottawa, and received a categorical 'no' in response.²⁹

19. The WPS did not have the same issue with tow trucks as was experienced in Ottawa or Alberta.³⁰ The tow truck company with which the WPS had a contract was cooperative with the policing actions, but there were threats being made by the protesters against the company and its owners if they participated in towing cars. For example, there were attacks on the company's reputation through negative on-line reviews³¹ and problems with removing vehicles from private property. For instance, on the evening of February 7, 2022 the WPS sought to keep protesters off of private property including Assumption High School which was within the protest area. WPS officers saw protest vehicles park in the school's parking lot and advised them to move their vehicles from the school property. Protesters responded by coming out of their vehicles with tire irons and on this occasion - as in others - WPS members were swarmed, and had to disengage in order to avoid escalating matters.³² Ultimately, however, the protesters left Assumption High School after some negotiation.³³

²⁷ Crowley Examination, pp 194-196

²⁸ Dilkins Examination, p. 42

²⁹ Examination of Paul Leschied conducted November 8, 2022, p. 172

³⁰ In fact, on the day of the POU action the State of Michigan sent tow trucks over to Windsor, but they were not used: Crowley Examination, p. 285

³¹ Dilkins Examination, p. 31.

³² It is part of the police use-of-force model that sometimes police use their discretion to retreat when crowds become aggressive: Crowley Examination, p. 276

³³ Crowley Examination, pp 196-197

The Blockade – February 7 to 14, 2022

20. On the evening of February 7, 2022, the WPS followed its plan to control the intersection of College and Huron Church, which is the first intersection south of the entrance to the Ambassador Bridge. WPS traffic enforcement officers would let two or three cars go at a time and — once they were crossing the bridge — they would let more cars go. However, protesters were listening to open source media and becoming frustrated, and then one truck, then another and then another simply stopped in the southbound lane about 200-300 meters south of College. Very quickly all three lanes were blocked, and there was a back up of trucks miles into Detroit.³⁴

21. By virtue of this, early in the Blockade there were a number of trucks stranded on the Ambassador Bridge for hours. Because of the age of the bridge, there were concerns about its structural integrity. There were also concerns about commerce, and the lack of food, water and washrooms for those on the bridge. It was important to get the bridge cleared, but it was difficult to do so. The owner of the Ambassador Bridge had to be told to stop letting trucks on the bridge then, through negotiations with the protesters, vehicles already on the bridge were allowed to use an emergency fire route, and the Ambassador Bridge was cleared of trucks at about 10:20 pm.³⁵

22. Superintendent Crowley was aware of the impact of the Blockade of the Ambassador Bridge, and everyone in the EOC felt the pressure. They wanted to do more, but felt handcuffed. Superintendent Crowley grew up in Windsor, and has lived there his whole life, so he understood the importance of the Ambassador Bridge to his community and the country.³⁶ This contrasts with the protesters from Windsor whose statements have been accepted by this Commission and/or who gave *viva voce* evidence. At best, they seem not to have had any wider appreciation of the impact that their protesting was causing to the residents of Windsor — or, indeed, Canada — economically or otherwise.³⁷

23. There was a very high temperature volatility on the ground amongst the protesters, and over time this high temperature and volatility grew. The protesters were very aggressive in their language and their posture, and made comments such as they ‘were willing to die for the cause’. No one needed to die on the streets of Windsor or elsewhere protesting vaccine mandates. Mayor Dilkins had never seen a protest of this nature or spirit such as this Windsor — it was almost as if folks wanted some sort of brawl on the streets, and were hoping that the police would engage with them so they could have that kind of brawl. This caused police to take a measured response to the situation; they did not want to see a recreation of the events that happened in Toronto during the

³⁴ Crowley Examination, pp 198-199

³⁵ Crowley Examination, pp 199-202

³⁶ Crowley Examination, pp 202-203

³⁷ Leschied Examination, pp 188-191; Leschied Witness Statement, WTS00000049; Maisonville Witness Statement, WTS00000051; Diodati Witness Statement, WTS00000062

G20.³⁸ The principal lesson learned from Ottawa's immediate experience was to not let the protest grow; for example, do not let bouncy castles or hot tubs or similar amenities come to Huron Church Road.³⁹

24. The Ambassador Bridge was not the only critical infrastructure that were threatened during this week. For instance, there were threats to blockade the WPS headquarters, the Windsor-Detroit Tunnel and the Windsor Airport. Although none of these threats materialized, they could not be ignored and WPS had to deploy resources to all of these places as well as to hospitals in the vicinity of WPS headquarters.⁴⁰ In addition, the WPS had to devote two to three police cars to the Mayor's home for a week or two, after a bomb threat.⁴¹

25. Over time, generally the temperature of the public against the Ambassador Bridge Blockade also rose rapidly. There were Facebook groups being set up where people wanted to counter-protest or even to undertake some sort of vigilante justice to remove the protesters. People had gone through the pandemic together, and now this relatively small group of protesters was jeopardizing their employment. Union leadership was also suggesting that they may take self-help measures against the protesters.⁴²

26. The significant economic pressures also caused senior leaders in the United States to call for a resolution of the Ambassador Bridge Blockade, because it was impacting their economy, too. Moreover, the Blockade was adversely affecting the reputation of Windsor as a place to invest: in particular, there was concern that Windsor might not land the \$5 billion investment in an electric vehicle battery manufacturing facility being proposed by a joint venture of LG and Stellantis.⁴³

27. On Tuesday, February 8, 2022, at about 6:30 in the morning, Superintendent Crowley received a call from Superintendent Mike McDonnell of the OPP. At that time, doing a quick calculation, Superintendent Crowley advised Superintendent McDonnell that the WPS could probably use 100 OPP officers, not including Public Order Unit ("POU") officers. Superintendent McDonnell said that he needed a plan from the WPS for how 100 OPP officers would be used, and Superintendent Crowley said no problem. A plan was provided the next day, February 9, 2022, the same day when Chief Mizuno wrote asking for 100 officers.⁴⁴

³⁸ Dilkins Examination, pp 43-44, 46, 53

³⁹ Dilkins Examination, p. 38

⁴⁰ Crowley Examination, pp 236-238

⁴¹ Crowley Examination, p. 238; Dilkins Examination, p. 46

⁴² Dilkins Examination, pp 53-54

⁴³ Dilkins Examination, pp 81-84

⁴⁴ Crowley Examination, pp 203-207

28. The WPS did not have experience with public order operations and did not have trained POU officers, so the WPS asked the OPP for help. Superintendent Earley of the OPP came to the EOC on February 10, 2022, and Superintendent Crowley understood that they would form a unified command team, in which Superintendent Earley would be in charge of the public order response, as well as the numerous OPP resources. As a critical incident commander, Superintendent Crowley understood that this meant that at times Superintendent Earley would step forward and he (or Superintendent Karel DeGraaf, who took day shifts) would step back, and at other times the WPS critical incident commander would step forward and Superintendent Earley would step back. There were mutual consultations. This is how unified command worked throughout this operation, although WPS was always the police of jurisdiction.⁴⁵

29. Public Order Units arrived from multiple services. The Public Order commanders came up with the Public Order Plan. Superintendent Earley, because she was in charge of the Public Order Plan, approved it, after consulting with those others in the unified command. It took only two days to prepare the formal Public Order Plan in part because it was prepared by subject matter experts, and in part because the informal planning process started when the first informal requests were made.⁴⁶

30. The protests were not simple. In addition to threats against officers, threats of blockading additional critical infrastructure and the bomb threats to the Mayor's home and behind the police line,⁴⁷ the cold February weather and the officers' long hours created a lot of tension and possibly an increased risk of safety and security of officers and the general public.⁴⁸ There was violence during this Blockade.⁴⁹

31. Children were present at the protest. In and of itself this was a serious safety concern; this serious concern was exacerbated by open-source communications to the effect that protesters were going to use children as human shields. Superintendent Crowley heard these communications himself, and saw a picture of children holding hands across the intersection of Church and College (WPS000001137, below). WPS had to make coordinate with the Children's Aid Society in making its arrest plans.⁵⁰

⁴⁵ Crowley Examination, pp 207-212

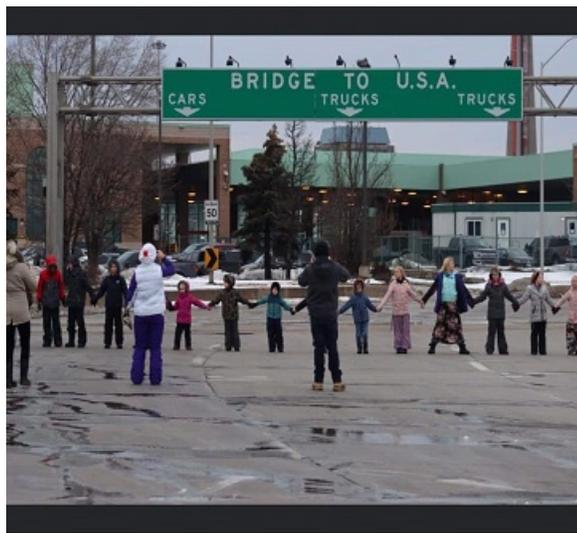
⁴⁶ Crowley Examination, pp 216-217

⁴⁷ Examination of Superintendent Dana Earley conducted November 8, 2022, p. 82

⁴⁸ Crowley Examination, pp 239-241, p. 244, , OPP00004539

⁴⁹ Crowley Examination, pp 287-288

⁵⁰ Crowley Examination, pp 239-240, p. 280



32. The provincial declaration of a state of emergency made little impact on the Public Order Plan. The injunction made by Chief Justice Morawetz of the Ontario Superior Court of Justice was impactful: it empowered the services to focus not only on Huron Church Road but also on the roads leading there, permitting things such as towing cars off of side streets. Although the WPS already had reasonable grounds to charge the protesters with criminal mischief, the injunction potentially provided an additional criminal charge to lay: disobeying a court order.⁵¹ In this regard, efforts were made to ensure that the public knew of the terms of the injunction, as well as its legal consequences including using mainstream media, social media, handing out flyers, posting documents on telephone poles, jersey barriers, etc.⁵²

33. The Public Order Operation took place on February 12 and 13, and the Ambassador Bridge was cleared shortly after midnight on February 14, 2022. In the end it was a very successful and efficient operation. Approximately 44 people were charged criminally. There were no injuries, no property damage, and Ambassador Bridge was cleared relatively quickly.⁵³

34. WPS and OPP worked well together in the unified command. In this respect, Ontario Women in Law Enforcement gave its 2022 Teamwork award to Superintendent Earley and members of both services. Superintendent Crowley nominated them for this award.⁵⁴

⁵¹ Crowley Examination, pp 217-219

⁵² Crowley Examination, p. 287

⁵³ Crowley Examination, pp 220-221

⁵⁴ Examination of Superintendent Dana Earley conducted November 8, 2022, p. 136.

After the Ambassador Bridge Blockade Was Cleared

35. Subsequent to the clearance of the Ambassador Bridge Blockade, the WPS and the OPP implemented a traffic plan to ensure that access to the bridge remained clear. This traffic plan was developed based on the OPP's experience in protracted demonstrations. It was accomplished by erecting jersey barriers from E.C. Row Expressway to the Ambassador Bridge and maintaining a police presence. Protesters were permitted to remain where they were away from the bridge off the road and not in any danger. The number of remaining protesters was probably under 10.⁵⁵

36. There were numerous threats that the Ambassador Bridge might be blocked again but, in the end, this did not happen. From open sources WPS heard that protesters from Ottawa and Toronto were planning to block the bridge again. The WPS re-evaluated the situation daily in light of present intelligence and information, and act accordingly. The measures taken to preserve access to the Ambassador Bridge created a major inconvenience to the residents of Windsor, which was the reason for re-evaluating the measures taken every day.⁵⁶

37. The WPS did not use the *Emergencies Act* (Canada) at all, but it may have had a dissuasive effect on people returning to the Ambassador Bridge.⁵⁷

38. The EOC remained operative for 21 days in total.⁵⁸

39. A significant lesson learned from Ottawa that applied after February 13, 2022 was to not permit the protesters to set up protests on private property at or near Huron Church Road. WPS confirmed with private property owners in the vicinity of the Ambassador Bridge that they could act as their agents to remove protesters. Having been cleared, the protesters did not have the opportunity to continue protesting in a similar manner on private property.⁵⁹

Conclusion

40. When a protest against national issues — such as the Freedom Convoy — takes place, it is local communities that are the most significantly impacted by the actions of these protests. The Ambassador Bridge was no different. The citizens and businesses within the City of Windsor suffered as a result, police resources were stretched and ultimately it was the City of Windsor that “carried all the water” in the sum of approximately \$5.3 million for the police action alone. The

⁵⁵ Crowley Examination, pp 221-223

⁵⁶ Crowley Examination, pp 223-225

⁵⁷ Crowley Examination, p. 225

⁵⁸ Crowley Examination, p. 250

⁵⁹ Crowley Examination, pp. 197-198

question still remains as to who should bear the cost of additional resources employed in situations such as this, which go beyond being a typical municipal policing matter and into the realm of national, economic emergency.⁶⁰

41. Going forward, it is respectfully submitted, there should be an agreement or - at least - an agreed-upon plan – as to the various responsibilities of different orders of government in matters concerning the maintaining and securing international borders and other critical infrastructure— not only in Windsor, but also across the country. Central to any such agreement or plan is that police must retain their operational independence.

42. The Ambassador Bridge Blockade was resolved without the assistance of and prior to the invocation of the *Emergencies Act*. Whether the invocation of the *Emergencies Act* had any impact on future attempts to block the bridge is uncertain. The WPS take no position on whether the *Emergencies Act* was properly invoked on February 14, 2022.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 9th day of December, 2022



Thomas McRae
Of Counsel to Windsor Police Service



Heather Paterson
Of Counsel to Windsor Police Service

⁶⁰ Dilkins Examination, pp 79, 85-86