



**PUBLIC ORDER  
EMERGENCY  
COMMISSION**

**COMMISSION  
SUR L'ÉTAT  
D'URGENCE**

**Public Hearing**

**Audience publique**

**Commissioner / Commissaire  
The Honourable / L'honorable  
Paul S. Rouleau**

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## II Appearances / Comparutions

Commission Co-lead Counsel	Ms. Shantona Chaudhury Mr. Jeffrey Leon
Commission Senior Counsel	Mr. Frank Au Ms. Erin Dann Mr. Gabriel Poliquin Ms. Natalia Rodriguez Mr. Daniel Sheppard
Commission Regional Counsel	Ms. Mona Duckett Mr. Sacha Paul Ms. Maia Tsurumi
Commission Counsel	Mr. Stephen Armstrong Mr. Misha Boutilier Mr. Eric Brousseau Ms. Sajeda Hedaraly Ms. Alexandra Heine Ms. Nusra Khan Mr. Étienne Lacombe Mr. John Mather Ms. Allison McMahon Mr. Jean-Simon Schoenholz Ms. Dahlia Shuhaibar Mr. Guillaume Sirois-Gingras
Commission Executive Director	Ms. Hélène Laurendeau

### III

## Appearances / Comparutions

Government of Canada

Mr. Robert MacKinnon  
Ms. Donnaree Nygard  
Mr. Brendan van Niejenhuis  
Ms. Andrea Gonsalves  
Mr. Andrew Gibbs  
Ms. Caroline Laverdière  
Mr. Stephen Aylward

Government of Saskatchewan

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Mr. Michael J. Morris, K.C.

Government of Manitoba

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Ms. Coral Lang

Government of Alberta

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Ms. Stephanie Bowes  
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Mr. Peter Buijs  
Mr. Shaheer Meenai

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Ms. Anne Tardif  
Ms. Alyssa Tomkins  
Mr. Daniel Chomski

City of Windsor

Ms. Jennifer L. King  
Mr. Michael Finley  
Mr. Graham Reeder

## IV

### Appearances / Comparutions

Mr. Peter Sloly

Mr. Tom Curry

Ms. Rebecca Jones

Mr. Nikolas De Stefano

Ottawa Police Service

Mr. David Migicovsky

Ms. Jessica Barrow

Ontario Provincial Police

Mr. Christopher Diana

Ms. Jinan Kubursi

Windsor Police Service

Mr. Thomas McRae

Mr. Bryce Chandler

Ms. Heather Paterson

National Police Federation

Ms. Nini Jones

Ms. Lauren Pearce

Ms. Jen Del Riccio

Canadian Association of Chiefs of  
Police

Ms. Aviva Rotenberg

CLA/CCCDL/CAD

Mr. Greg DelBigio

Ms. Colleen McKeown

Union of British Columbia Indian Chiefs

Ms. Cheyenne Arnold-Cunningham

Counsel Meagan Berlin

Ms. Mary Ellen Turpel-Lafond

National Crowdfunding & Fintech  
Association

Mr. Jason Beitchman

## V

### Appearances / Comparutions

Canadian Constitution Foundation and Professor Alford	Ms. Sujit Choudhry Ms. Janani Shanmuganathan Prof. Ryan Alford
Ottawa Coalition of Residents and Businesses	Mr. Paul Champ Ms. Emilie Taman Ms. Christine Johnson
The Democracy Fund, Citizens for Freedom, JCCF Coalition	Mr. Rob Kittredge Mr. Antoine D'Ailly Mr. Alan Honner Mr. Dan Santoro Mr. Hatim Kheir Mr. James Manson
Canadian Civil Liberties Association	Ms. Cara Zwibel Ms. Ewa Krajewska
The Convoy Organizers	Mr. Brendan Miller Ms. Bath-Sheba Van den Berg
Insurance Bureau of Canada	Mr. Mario Fiorino

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Ottawa, Ontario

1  
2 --- Upon commencing on Friday, October 28, 2022 at 9:30 a.m.

3 **THE REGISTRAR:** Order. À l'ordre. The Public  
4 Order Emergency Commission is now in session. La Commission sur  
5 l'état d'urgence est maintenant ouverte.

6 **COMMISSIONER ROULEAU:** Good morning. Bonjour.

7 **MR. FRANK AU:** Good morning.

8 **COMMISSIONER ROULEAU:** Okay. I gather we have a  
9 new witness? Okay, I think we're ready to go ahead, then. Go  
10 ahead.

11 **MR. FRANK AU:** We are.

12 The Commission calls the former Chief Peter  
13 Sloly.

14 **THE REGISTRAR:** Sir, will you swear on a  
15 religious document, or do you wish to affirm?

16 **MR. PETER SLOLY:** Religious document, please.

17 **THE REGISTRAR:** We have the Bible, the Koran, or  
18 the Torah available.

19 **MR. PETER SLOLY:** I'll take the Bible, please,  
20 thank you.

21 **THE REGISTRAR:** For the record, please state your  
22 full name and spell it out.

23 **MR. PETER SLOLY:** Peter John Michael Sloly,  
24 S-L-O-L-Y.

25 **--- MR. PETER SLOLY, Sworn:**

26 **MR. FRANK AU:** Good morning, Commissioner.

27 **MR. PETER SLOLY:** Good morning, sir.

28 **COMMISSIONER ROULEAU:** Okay, go ahead.

1 --- EXAMINATION IN-CHIEF BY MR. FRANK AU:

2 MR. FRANK AU: It's Frank Au, Senior Counsel for  
3 the Commission.

4 MR. PETER SLOLY: Good morning, Frank.

5 MR. FRANK AU: Good morning, Mr. Soly. You were  
6 the Chief of the Ottawa Police Service between 2019 until  
7 February 2022.

8 MR. PETER SLOLY: That's correct, sir.

9 MR. FRANK AU: You served also at the Toronto  
10 Police Service for 28 years.

11 MR. PETER SLOLY: That's correct. Well, just 27  
12 and change, but thank you.

13 MR. FRANK AU: You rose through the ranks from  
14 being a Constable in 1988 to Deputy Chief in 2009.

15 MR. PETER SLOLY: That's correct.

16 MR. FRANK AU: You left the service in 2016?

17 MR. PETER SLOLY: Yes, I did.

18 MR. FRANK AU: And then you spent some time in  
19 the private sector.

20 MR. PETER SLOLY: That's correct.

21 MR. FRANK AU: Now, I understand that when you  
22 first joined the Toronto Police Service there were relatively  
23 few members who had a university degree who were new recruits.

24 MR. PETER SLOLY: Yeah, that's correct.

25 MR. FRANK AU: But you had a BA in Sociology from  
26 McMaster University?

27 MR. PETER SLOLY: Correct.

28 MR. FRANK AU: And later, you got an MBA from



1 York University.

2 **MR. PETER SLOLY:** Yes, I did.

3 **MR. FRANK AU:** Now, you were trained in the  
4 Incident Command System?

5 **MR. PETER SLOLY:** Yes, I was.

6 **MR. FRANK AU:** And tell us more about your  
7 training.

8 **MR. PETER SLOLY:** I received Incident Command  
9 System training from 100 to 400 levels. I received additional  
10 training here in Ottawa, I consider it 500 level, essentially  
11 it's a District Operations Commander, which allows you to  
12 command a multi-site major incident over a protracted period of  
13 time. So I had designations up to, I don't know if it's the  
14 right terminology, but a 500 level, and I had practical  
15 experience at every one of those levels in terms of being part  
16 of Incident Command. So either being an Incident Commander,  
17 what is now known as an Event Commander, Major Event Commander  
18 or Major Incident Command through to a District Operations  
19 Commander, mostly in my time in the Toronto Police Service and  
20 also during my two tours of duty in United Nations Peacekeeping  
21 Mission.

22 **MR. FRANK AU:** Now, you also had training and  
23 experience with the Public Order Units.

24 **MR. PETER SLOLY:** Correct, sir.

25 **MR. FRANK AU:** Tell us about that.

26 **MR. PETER SLOLY:** Again, I received Public Order  
27 Unit training, both through the Toronto Police Service. It's a  
28 little bit fuzzy now because it's going back to the early

1 2000's, but there was also a provincial standard training course  
2 that took place out in a rural community that I can't remember.  
3 And then there was national training sessions that we did from  
4 British Columbia across the country.

5 **MR. FRANK AU:** You also mentioned just earlier  
6 that you spent some time on a United Nations peacekeeping  
7 mission?

8 **MR. PETER SLOLY:** Yes.

9 **MR. FRANK AU:** Tell us about that?

10 **MR. PETER SLOLY:** I was fortunate enough to have  
11 been selected by then Chief Fantino to represent the Toronto  
12 Police Service. I think at that time, I was the first senior  
13 officer for a municipal police service to be part of a UN  
14 peacekeeping mission that had been organized through the RCMP.

15 I was deployed to Pristina in August of 2001 and  
16 completed two tours, coming back home in 2002. I was the  
17 Canadian contingent commander. This was a mission where the  
18 police of jurisdiction actually had full powers of policing,  
19 including use of force detention while building up a local  
20 police service. It was also during 9/11 and a very significant  
21 and complicated and volatile zone.

22 **MR. FRANK AU:** When you attended an interview  
23 with us and my Commission colleagues, you described that  
24 experience as the best professional and personal experience  
25 you've ever had. Why was that?

26 **MR. PETER SLOLY:** It just tested, and stressed,  
27 and challenged, and grew me in literally every single way  
28 possible: physically, mentally, emotionally. I'm a very

1 spiritual person. It allowed me to see parts of the world I  
2 don't think I'll ever get back to see again. And to be involved  
3 in a unique, challenging, and often tragic set of circumstances,  
4 but one that opened my eyes to the conditions globally.

5 I had a chance to work with 53 different police  
6 services from around the world, and so that was also an  
7 opportunity to learn the good, the bad, and the indifferent of  
8 progressive policing at the turn of the century.

9 **MR. FRANK AU:** M'hm.

10 **COMMISSIONER ROULEAU:** If I could just interrupt  
11 briefly? This is being translated and there's sign language and  
12 you're a little bit fast on the output. If you could try and --  
13 -

14 **MR. PETER SLOLY:** Thank you, sir.

15 **COMMISSIONER ROULEAU:** --- slow down?

16 **MR. PETER SLOLY:** Probably a little bit of  
17 nervous energy in there. But thank you. I will try to slow  
18 down.

19 **COMMISSIONER ROULEAU:** That's quite  
20 understandable.

21 **MR. FRANK AU:** Now, speaking of interviews, you  
22 attended four interviews with me and my Commission colleagues  
23 between August and early October. You were very generous with  
24 us, with your time. And after those interviews, we summarized  
25 the contents of those interviews, and you've had an opportunity  
26 to review the summary? Is that correct?

27 **MR. PETER SLOLY:** Yes, sir.

28 **MR. FRANK AU:** I want to show you a copy on the

1 screen, the final version of the summary. It's WTS00000040.

2 Now, is this the version that you approved?

3 **MR. PETER SLOLY:** I trust it is, sir.

4 **MR. FRANK AU:** Okay. Is there any correction  
5 that you'd like to make to this summary?

6 **MR. PETER SLOLY:** No, thank you.

7 **MR. FRANK AU:** So this will be adopted and will  
8 be an exhibit.

9 Now, the reason that we're here today are the  
10 events in January and February of this year, leading to the  
11 invocation of the *Emergencies Act*. As the Chief of Police in  
12 Ottawa at that time, you are uniquely positioned to give us your  
13 perspective and to help us understand.

14 But to really understand, I think we need to go  
15 back further to when you started with the Ottawa Police Service.

16 **MR. PETER SLOLY:** M'hm.

17 **MR. FRANK AU:** Tell us about the circumstances of  
18 the Ottawa Police Service in which you found yourself?

19 **MR. PETER SLOLY:** Well, when I was being  
20 recruited for the position, it was very clear to me through the  
21 recruiter on behalf of the Board that through their consultative  
22 process with service members and community members, that the  
23 Ottawa Police Service needed to be significantly changed.  
24 Operationally, administratively, from an HR standpoint, the  
25 usual sort of change processes that large organizations require  
26 on an ordinary basis, and very specifically, culturally.

27 Internally, there was a culture that was less  
28 welcoming, less inclusive, less diverse, less equitable, and

1 that had impacts on things like workplace harassment, member  
2 moral.

3 Externally, that translated into a real or  
4 perceived level of trust in the broader community, but  
5 specifically in racialized and marginalized communities, that  
6 the service wasn't, in some cases, appropriate enough and that  
7 there was a declining level of trust and confidence.

8 Any one of those things would have been a major  
9 change agenda for any external chief coming in. All of those  
10 combined required a significant effort of changed management and  
11 changed leadership that I was asked, on behalf of the Board, as  
12 the incoming chief, to deliver over the course of my five-year  
13 contract.

14 **MR. FRANK AU:** M'hm. If I could call up your CV?  
15 The document ID number is COM00000759. If we could go to page  
16 2? Scroll down.

17 So you see under "Ottawa Police Service, 2019 to  
18 2022", you talked about how you were given a major culture  
19 organization change mandate. And that's something you just  
20 outlined for us.

21 **MR. PETER SLOLY:** Yes, sir.

22 **MR. FRANK AU:** Tell us about some of the  
23 challenges you faced once you took the post?

24 **MR. PETER SLOLY:** I'm not sure the Commission has  
25 all the time in the world for that list. But, I mean, I think  
26 the most simple thing to say is any effort of change is going to  
27 be difficult, particularly in a large organization. In this  
28 case, I believe the Ottawa Police Service is over a century old.

1 And these were long-standing structural deficit issues. Needed  
2 investment in recruiting through staff development training.  
3 Leadership development in particular was something that  
4 repeatedly our membership identified and external auditors  
5 identified. And those things just don't -- that's not a light  
6 switch you can turn on and off. It's something that you have to  
7 build and grow and almost organically move through the  
8 organization.

9                   Operationally, while they were excellent in some  
10 ways -- I just want to be clear, Commissioner, the Ottawa Police  
11 Service, and one of the reasons why I came here, had a  
12 reputation, deservedly so, of being one of the best operational  
13 police services. We've heard about their expertise in planning,  
14 their ability through missing persons investigations was second  
15 to none. They had really advanced -- in some cases, advanced HR  
16 systems that were to be seen as a best practice. So this was  
17 not a deficit across the board, but there were significant  
18 deficits in very specific areas that was contributing to some of  
19 the cultural and morale issues.

20                   My attempt in the first three months was really  
21 to go around on a listening process in small groups, large  
22 groups, internally and externally, to identify those areas,  
23 bring a command team that was, even in the early days, a  
24 struggle, there was significant challenges at the command team  
25 level, but people were leaning in and doing their best.

26                   I would say, though, that the challenges really  
27 came in in March of 2020. Three significant events. The  
28 suspension of one of my two Deputy Chiefs, the culmination of a

1 significant internal criminal corruption investigation where  
2 three of my officers were arrested after an extensive joint  
3 RCMP/Ottawa Police Service investigation, and of course, the  
4 declaration of the global pandemic, two months later, the death  
5 and murder of George Floyd, the Black Lives movement, and the  
6 Defund movement.

7 I think that signalled the start, not just here  
8 in Ottawa, but across police services in North America, I  
9 suggest around the world, as a significant change in the level  
10 of public trust and confidence in policing and the broader  
11 justice system. It certainly had material impacts on police  
12 services here in Ottawa. The Defund movement put significant  
13 pressure on our Board and our Council to adjust the policing  
14 budget in regards to size and to change police service delivery  
15 in terms of integration.

16 And these were real challenges on top of the  
17 significant challenge of change mandate that the Board had  
18 explicitly and expressly given to me as the incoming chief.

19 **MR. FRANK AU:** Now, you identified a few  
20 challenges that are not unique to the Ottawa Police Service,  
21 such as the pandemic, such as the Defund movement, and so on.  
22 What about within the organization? You talked about earlier,  
23 challenges involving the command team. Tell us more about that?

24 **MR. PETER SLOLY:** Well, the command structure, I  
25 believe to this day, but I might be wrong, is the Chief of  
26 Police, two Deputy Chiefs, and the Chief Administration Officer.

27 Within my first three months in the position, I  
28 lost one of those Deputy Chiefs to a suspension. That then

1 required me to accelerate a succession plan that truly wasn't  
2 ready for acceleration, and bring in a series of three-month  
3 assignments to the rank of the superintendent.

4 I had two very experienced senior officers at  
5 that time. Both superintendents had a lot of experience. And  
6 so I rotated them for the first year. But within that year,  
7 both of them retired. And after that, the rotation went further  
8 into the superintendent ranks. Some were really good fits, some  
9 struggled. But it was a very suboptimal situation.

10 In 2021, in the early part of the year, the Board  
11 made the decision to end the contract of my Chief Administration  
12 Officer. That then required me to look at my command level, and  
13 the only person that I could put into that position was Deputy  
14 Chief Bell.

15 So essentially, for the full -- almost the full  
16 year leading up to the events of the convoy, I had one full-time  
17 Deputy Chief who was in a civilian position as a Chief  
18 Administration Officer, and I was rotating two -- for the most  
19 part, two uniformed Superintendents through the Deputy Chief  
20 process.

21 Again, full respect to those individuals. They  
22 stepped up, in some cases volunteered. When I asked, they  
23 stepped up and they did their very best in very, very difficult  
24 circumstances during probably the most difficult time in Ottawa  
25 Police history and in policing across Canada. And so I have  
26 nothing but praise and thanks for them, but it was a sub-optimal  
27 situation that everyone was struggling to make the best of.

28 **MR. FRANK AU:** Now, did that happen in 2021, you



1 said?

2 **MR. PETER SLOLY:** Well, the suspension of Deputy  
3 Chief Jaswal was in 2020. The subsequent retirements of my two  
4 more -- two most senior Superintendents happened over the course  
5 of 2021 into 2021. The separation of the Chief Administration  
6 Officer was in early 2021.

7 So for the majority of 2021, that circumstance of  
8 Deputy Chief Bell being in an administrative function and two  
9 Superintendents operating in the uniform function was the  
10 situation that I was managing with.

11 **MR. FRANK AU:** So at the most senior executive  
12 level, you were having rotating staff, so to speak.

13 What impact did that have on the rest of the  
14 organization at that time?

15 **MR. PETER SLOLY:** It has a cascading impact on  
16 down the way. As you move any officer from one level to the  
17 next on a temporary position, not a permanent promotion, you  
18 then affect the next level and the next level.

19 I remember once in Toronto someone said every  
20 time we promote a new Chief, we have to change out seven  
21 positions below. I don't know if it's exact calculation, but  
22 that's the ripple effect.

23 So it not only destabilizes the executive level,  
24 it destabilizes, to a degree, the other parts.

25 There are always benefits. I mean, people are  
26 given stretch opportunities or given leadership opportunities  
27 earlier than they maybe normally would have. And again, some  
28 rise amazingly to that. Others do an excellent good job, and

1 others struggle. But it does create churn in the organization  
2 that was already in churn based on all the changes that were  
3 mandated by the Board and the massive external churn by the  
4 factors such as the death of George Floyd and the global  
5 pandemic.

6                   There was another factor that, for me, as a  
7 newcomer to the city, as an outsider Chief, I think we can all  
8 remember in the early days of the pandemic the lockdown and the  
9 requirement not to meet in public was significant. One of the  
10 most important ways that any leader can get to know their own  
11 members and the community or the clients that they serve is to  
12 meet in person.

13                   So much is lost on Zoom. Emails and text  
14 messages never cover it, as we've seen in testimony here.

15                   But I lost that opportunity three months into my  
16 mandate to actually sit down with my members in the cafeteria  
17 and have a cup of coffee with them, to have small group focus  
18 group meetings, which I did extensively in my first three  
19 months.

20                   And even when we could get together, we were  
21 masked up so we couldn't see facial expressions and we were  
22 spaced out across a big gymnasium, so we couldn't really  
23 communicate. We had to literally shout at each other.

24                   I think all of that, unfortunately, meant that we  
25 couldn't build the level of cohesion internally or externally  
26 during a very critical, contentious period of time. A sustained  
27 critical and contentious period of time. But we did our best.

28                   **MR. FRANK AU:** We've heard from other witnesses

1 that notwithstanding the OPS excellent reputation in the past  
2 for planning for and responding to large-scale events, the  
3 pandemic itself has caused a lot of changeover and depletion of  
4 expertise.

5 Tell us more about that situation.

6 **MR. PETER SLOLY:** I think it's actually been well  
7 articulated. I will only add, Mark Ford, who -- his father was  
8 the former Chief of Police here, an excellent Chief of Police.  
9 Mark was an excellent leader.

10 He was one of those first two Superintendents I  
11 brought in on rotation along with Joan McKenna. Mark actually  
12 was the most experienced Incident Commander and one of the most  
13 experienced Critical Incident Commanders. Unfortunately, he  
14 retired some six or seven months before the events that we're  
15 going to be substantially focusing on.

16 So that would be one example of many where we had  
17 people who had, you know, gone past their pensionable time, had  
18 given their life blood, literally, to the organization and to  
19 the profession of policing and had made a decision, as many  
20 executives in many different parts of civil society, to take  
21 their well-earned retirement and go on with their life with  
22 their health intact.

23 We celebrated his departure, but he was missing  
24 from our team and we really needed our best people to be in the  
25 best places possible.

26 **MR. FRANK AU:** Now, you told us earlier that you  
27 came in to the Ottawa Police Service and you were given a change  
28 mandate. How was that mandate perceived when you were about two

1 years into your job?

2 **MR. PETER SLOLY:** Well, there's a -- there's  
3 probably a not police saying about police officers. I suspect  
4 it applies to everybody. There's two things that every cop  
5 hates, the way things are, and change, so it was going to be  
6 difficult no matter what. Nobody wanted things to remain the  
7 way they were and everyone was fearful of change to varying  
8 degrees across the full human spectrum, of course.

9 And this wasn't just a tinker around the edge  
10 change mandate. It was to go right to the heart of the culture  
11 and to the most difficult parts of that culture, the darker part  
12 of that culture, things like systemic racism, systemic misogyny.  
13 The trust factor between police and the broader community, but  
14 very specifically the racialized and marginalized and indigenous  
15 communities here in Ottawa.

16 And those were the most contentious topics in  
17 policing for my entire career going back to 1988 in Toronto.

18 Any Chief of Police or any command team that took  
19 on any one of those issues would be taking on a major, major  
20 challenge. Taking them on in the middle of a global pandemic,  
21 in the middle of the Black Lives Matter movement and the defund,  
22 abolish police movements just made it that much more  
23 complicated. But it was still necessary. It still had to get  
24 done. Not because it was my mandate. It was just the right  
25 thing to do for policing.

26 It's what our members actually wanted, and it  
27 certainly is what the community wanted.

28 **MR. FRANK AU:** So if I take your mind back to

1 January -- early January of 2022 before the Freedom Convoy event  
2 arrives in mid-January, how would you summarize the state that  
3 the Ottawa Police Service was in?

4 **MR. PETER SLOLY:** Committed to the direction,  
5 worried and tired from the effort to have travelled as far as  
6 they did.

7 **MR. FRANK AU:** And what was the level of trust  
8 among the different members within the service and their trust  
9 for the leadership?

10 **MR. PETER SLOLY:** I mean, I could answer that in  
11 any great specificity. Clearly, there was a range. I think --  
12 I don't know which one of the witnesses presented -- I think it  
13 was Inspector Beaudin from the OPP that talked about the range  
14 of crowd dynamics. Human nature is human nature, so no matter  
15 what organization you're in, you're going to get some five  
16 percent that will adopt everything that's said without  
17 questioning, five percent that will resist mightily anything  
18 that is said with all sorts of questioning and then some range  
19 in between of people that will move if they're incentivized or  
20 if they feel there's a sufficient altruistic value around it.

21 I think those crowd dynamics play out in any  
22 crowd, including the group in this room here today.

23 **MR. FRANK AU:** Now, with that context, let's talk  
24 about the beginning of the Freedom Convoy events.

25 When did you first learn about the Freedom  
26 Convoy?

27 **MR. PETER SLOLY:** My recollection, sir, was a  
28 February 13th Hendon Report.

1                   **MR. FRANK AU:** February?

2                   **MR. PETER SLOLY:** Sorry. January 13th. You may  
3 need to check me on dates a little bit.

4                   I believe that was a report that came into my  
5 inbox for whatever reason that day, and it was an extremely busy  
6 period. We were still dealing with a multiple-death explosion  
7 in our city that killed some five -- four or five people. But I  
8 did have a chance to glance through the report.

9                   Certainly there was enough information for me to  
10 know that this could be a significant event in the near term.

11                   My recollection is that I forwarded that email to  
12 Deputy Chief Bell and Acting Deputy Chief Ferguson. I  
13 understand that there hasn't been an email to show that, but  
14 that was my recollection.

15                   But irregardless, somewhere on or around February  
16 13th there was a direction to Deputy Chief Bell to commence an  
17 intelligence review of all the circumstances around what was  
18 being purported to be a convoy coming to our city and to lead  
19 the over -- oversee the work of developing an intelligence  
20 threat risk assessment that would then inform Acting Deputy  
21 Chief Ferguson's assignment to develop the operational plan for  
22 the event informed by the intelligence threat risk assessment.

23                   **MR. FRANK AU:** Now, we've heard from the evidence  
24 of your Deputies that after you became the Chief of the Ottawa  
25 police Service, one of your priorities was to ensure that  
26 operations were intelligence led.

27                   Can you tell us more about why that was important  
28 to you?

1                   **MR. PETER SLOLY:** Thank you very much.

2                   Just to take a back -- a little step back, all  
3 operations, not just Emergency Preparedness and Incident Command  
4 or Critical Incident Command, but all of our Operations, from  
5 traffic management order management, crime management that we  
6 would should be intelligence-led, information, best practices,  
7 evidence-based best practices should inform for the most part  
8 our systems, our policies, our procedures, our practices, and  
9 the evaluation of the outputs and outcomes that came from that.  
10 So that was an overarching theme.

11                   How it applied within Incident Command, Incident  
12 Command Systems, Emergency Preparedness was again, a weather  
13 report that says there is going to be rain tomorrow, well let's  
14 try to validate that to a greater degree. Is it going to be  
15 raining in a city this large? Is it going to be raining and  
16 flooding in one part, or is it across the entire city? Because  
17 that will then assess the amount of resources we need and the  
18 sequence of events we need to apply. That's an analogy, that's  
19 not meant as an actual example.

20                   So Intelligence-led as much as possible.  
21 Understand the nature -- the context of the situation, the  
22 factors involved, the nature of the threat, the risk of the  
23 threat, the likelihood of it actually taking place, and the  
24 resources necessary to mitigate in the first instance and  
25 respond to in -- at the back end. And then to recover from, the  
26 recovery period, which I suggest this is still a recovery period  
27 Commission, with the City of Ottawa and the Country of Canada.

28                   Does that answer your question, sir?

1                   **MR. FRANK AU:** Yes. And my next question is to  
2 what extent were you satisfied that that was in fact the case in  
3 -- at the OPS on or about January?

4                   **MR. PETER SLOLY:** Thank you. I believe Interim  
5 Chief Bell did reference his own views on the advancements that  
6 we had made, particularly in the previous year, and he's  
7 absolutely correct. That we had made significant advancements  
8 around our Intelligence-led approach to our broader Operations,  
9 crime, traffic, order management. Order management is a subset,  
10 includes Critical Incident Command and Incident Command System.  
11 We had made significant strides in making sure our Information  
12 section and our Intelligence section were lined up with our  
13 Operational sections, and that we had sufficient crime analysis,  
14 administrative analysis to execute and continuously improve on  
15 those processes.

16                   We did not specifically take on Intelligence-led  
17 Threat Risk Assessments as a very specific product. Our  
18 priorities at that time were crime, traffic, order management  
19 was not at the same level. I think in 2021, we had our -- a  
20 very high level of gun and gang related shootings, and so crime,  
21 traffic was the number one issue in the community, always is no  
22 matter what jurisdiction.

23                   So those were really our one and two priorities,  
24 and order management was probably at the third level. Because  
25 we actually had up until that point a very good record, a very  
26 good record of planning and implementing plans and successfully  
27 ending a range of demonstrations, but we had made progress.

28                   I did make it very explicit, particularly, this



1 one I'm not 100 percent sure on, but particularly around the  
2 events in mid-2020, when we started to see large events coming  
3 into the city, Wet'suwet'en, Black Lives Matter in June, Justice  
4 for Abdi in the fall. These are complex, volatile, political,  
5 trust factor events that were contentious and could have gone a  
6 thousand different directions.

7 I was very, very strong at that point on the  
8 Intelligence Threat Risk Assessment driving the Operational  
9 Plan, and in that period I think we did make some significant  
10 moves forward around how the intel TRA threat assessment  
11 supported, enabled, enlightened the Operational planning.

12 **MR. FRANK AU:** Right. Now, you mentioned that  
13 the first Hendon report you read about the Freedom Convoy was on  
14 January 13th?

15 **MR. PETER SLOLY:** That's my recollection, sir.

16 **MR. FRANK AU:** And -- so I take it that you read  
17 it?

18 **MR. PETER SLOLY:** Yes. I can't say I read every  
19 single line, it was probably more of a skim-through read, but I  
20 did read it, yes, sir.

21 **MR. FRANK AU:** And what was your reaction upon  
22 reading it?

23 **MR. PETER SLOLY:** This is potentially going to be  
24 a significant event, that we probably need to get some people  
25 working on the Intel side and starting at least to put the  
26 framework of a plan in place.

27 **MR. FRANK AU:** Was that why you forwarded it to  
28 the deputies?

1           **MR. PETER SLOLY:** That was my recollection of  
2 forwarding it, but that's certainly why I assigned Deputy  
3 Chief Bell to lead the overseeing of the Intelligence Risk  
4 Assessment and assigned Acting Deputy Chief Ferguson for the  
5 Operational Plan.

6           By the way, those were their functional areas of  
7 responsibility. Deputy Chief Bell, again, I think has testified  
8 that the Intelligence was one of his directorates, and that the  
9 Planning Section was one of the directorates that Acting Deputy  
10 Chief Ferguson had just inherited. She had just started as the  
11 Acting Deputy Chief in January 2022.

12           **MR. FRANK AU:** And you expected the two of them  
13 to coordinate the information or intelligence that the  
14 Intelligence Unit received and incorporate that intelligence in  
15 the planning process?

16           **MR. PETER SLOLY:** Yes, sir.

17           **MR. FRANK AU:** Did you receive regular updates  
18 from your deputies?

19           **MR. PETER SLOLY:** Yes, I did, sir.

20           **MR. FRANK AU:** How often?

21           **MR. PETER SLOLY:** After that first week, that  
22 February 13th week, we may have raised it in discussion at -- I  
23 had a regular nine o'clock Command meeting, and whatever the  
24 deputies would lead their respective areas of command and talk  
25 about major projects, things that should come to my level, I  
26 have a general recollection that we would've have discussed it  
27 at least once or twice during that first week period.

28           Coming into the second week, the week leading up

1 to the weekend of January -- I'll just remind myself to slow  
2 down a little bit -- coming up to the weekend of January 28th,  
3 29th, and 30th, I recall that being almost on a daily basis.  
4 And I think towards the end of that week, or middle to the end  
5 of that week, we had my nine o'clock meeting and then a separate  
6 Command briefing on the Intelligence and planning of the -- of -  
7 - around the convoy events.

8 **MR. FRANK AU:** When you refer to "that week",  
9 were you referring to the week before the weekend arrival of the  
10 convoy?

11 **MR. PETER SLOLY:** Yes. Going into that first  
12 weekend before the weekend of the arrival, and then through that  
13 Monday, Tuesday, Wednesday, Thursday.

14 **MR. FRANK AU:** Right. And what did you learn as  
15 a result of these regular briefings about the nature of the  
16 convoy that was about to arrive?

17 **MR. PETER SLOLY:** My early impressions was there  
18 was, to some degree, some doubt as to whether or not this was  
19 actually going to materialise.

20 **MR. FRANK AU:** Sorry, whether it was going to?

21 **MR. PETER SLOLY:** Going to materialise. Whether  
22 this series of convoys, it was focussed I think mainly in the  
23 British Columbia area, but whether or not it was actually going  
24 to materialise. Clearly, as the days went on and Hendon reports  
25 came in, mainstream media, social media started to follow it  
26 more, there was certainly a sense that, no, there is going to be  
27 something that comes from as far away as St. John's,  
28 Newfoundland, and from Vancouver, British Columbia, and other

1 parts in Ontario itself.

2           The briefings that I was getting was that those  
3 two areas were working together. Our Intelligence Group were  
4 connected in with all of our policing partners, municipally,  
5 provincially, and federally. The Ottawa Police Service  
6 Intersect Program had been engaged early around information-  
7 sharing, intelligence-gathering, Operational Planning,  
8 deconfliction coordination. All of those things were sort of  
9 standard for any major event that had occurred under my tenure  
10 as the Chief of Police, and had been well-established going back  
11 some 15 years under previous chiefs of police.

12           So there was nothing out of the ordinary.  
13 Certainly things from a process standpoint, I saw what I  
14 expected to be the level of communication, coordination  
15 internally, communication, coordination with our key partners in  
16 the National Capital Region, and even more broadly, given the  
17 national scope of what was unfolding, that we were engaged with  
18 a range of other police services across the country.

19           **MR. FRANK AU:** Now, in that week leading up to  
20 the arrival of the convoy, what was your understanding as to the  
21 duration of the event?

22           **MR. PETER SLOLY:** Again, all of the reports, the  
23 briefings that I was receiving through my chain of command was  
24 that this was going to be a weekend event, some arriving the  
25 Thursday, more arriving the Friday, the bulk arriving for  
26 planned or at least scheduled events on the Saturday and the  
27 Sunday. That there might be some remnant that would stay  
28 behind, but that remnant would be similar to other

1 demonstrations that had come through where people stayed in the  
2 National Capital Region for a variety of reasons, but in some  
3 cases, setting up small tent cities that would at some point  
4 over the subsequent days, weeks, and in some cases months, would  
5 be gradually, through a measured approach, with multi-agency  
6 involvement from NCR and the City, they would be eventually  
7 moved either to a better location or moved back to wherever they  
8 had originally come from.

9 **MR. FRANK AU:** Now, during that period, did you  
10 continue to receive regular Hendon reports?

11 **MR. PETER SLOLY:** I was on the mailing  
12 distribution, so it came into my inbox. I could also see there  
13 were other Ottawa Police Service members on the distribution.  
14 And by that point I had explicitly asked and had been told that  
15 members within Deputy Chief Bell's command and Intelligence  
16 Directorate were receiving Hendon reports, were involved in  
17 Hendon-related briefings, and that those reports were informing  
18 the Intersect discussions, the Threat Risk Assessment.

19 **MR. FRANK AU:** Did you continue to read the  
20 Hendon reports when they landed in your inbox?

21 **MR. PETER SLOLY:** Not every day, sir. I would --  
22 if I had the ability I would, again, usually skim through a  
23 document. I do recall sort of, in the middle to the back end of  
24 that week, on a daily basis, doing a deeper, more full read.  
25 But at that point I was anything -- anything that was coming in,  
26 including emails from private citizens about this, I would try  
27 to skim read and if there was something relevant, I would  
28 usually just forward the email over into Deputy Chief Bell's

1 command, and copy in his Intelligence Directorate Commanders to  
2 make sure that they had the information and they could collate  
3 that into their larger threat risk assessment.

4 **MR. FRANK AU:** Now, you spoke about your  
5 understanding during that period that it was going to be a two-  
6 day or weekend event. Was that understanding based on the  
7 Executive briefings that you got, or a combination of that as  
8 well as other sources, including the Hendon reports that you did  
9 receive or read?

10 **MR. PETER SLOLY:** Yeah, the latter. The sum  
11 total of everything that I was reading or being briefed on, that  
12 was the -- on balance, the assessment.

13 **MR. FRANK AU:** And the totality of information or  
14 intelligence that you got did not change your view at the time  
15 that it was going to be a two-day or weekend event?

16 **MR. PETER SLOLY:** That's correct, sir.

17 **MR. FRANK AU:** And what was the nature of your  
18 role as the Chief at that time, as compared to the two Deputies  
19 who were assisting you?

20 **MR. PETER SLOLY:** Maybe -- I'm not sure ---

21 **MR. FRANK AU:** So let me be more specific; in  
22 terms of the collection of, or the analysis or the dissemination  
23 of, the intelligence within the OPS for the purpose of planning  
24 a response, what were the respective roles of you, as Chief, as  
25 compared to the two Deputy Chiefs who were assisting you?

26 **MR. PETER SLOLY:** Every Chief of Police or  
27 Commissioner is accountable and responsible for everything in  
28 the organization. But I had delegated, specifically delegated

1 those responsibilities to the two individuals, Deputy Chief Bell  
2 and Acting Deputy Chief Ferguson to oversee and ensure that  
3 there was an appropriate level of threat risk assessment and  
4 forming an appropriate level operational plan.

5 **MR. FRANK AU:** Would it be appropriate for you to  
6 ask questions, for instance, when you received additional  
7 information?

8 **MR. PETER SLOLY:** Absolutely. On any issue,  
9 whether it was an HR matter or a Professional Standards  
10 Investigation, if at any point there was a data point or a  
11 context issue, something that didn't seem to make sense, I would  
12 always ask a question, just to make sure that I understood the  
13 circumstances that they were dealing with. And if appropriate,  
14 I could provide advice, or direction, as required.

15 **MR. FRANK AU:** And did you direct Deputy Chief  
16 Bell to conduct, or have someone conduct the threat risk  
17 assessment?

18 **MR. PETER SLOLY:** That's entirely the direction  
19 that he had; that was his responsibility.

20 **MR. FRANK AU:** Was that something ordinarily done  
21 in response to this kind of event, or was that something  
22 particular to this situation?

23 **MR. PETER SLOLY:** Just I want to be clear about  
24 something; Deputy Chief Bell, himself, wasn't to sit down at his  
25 desk and conduct a threat risk assessment. But through the  
26 resources and the Directorates that he oversaw, to oversee that  
27 there was an appropriate threat risk assessment; yes, that was  
28 his directions.

1                   **MR. FRANK AU:** But was it an ordinary process for  
2 a threat risk assessment to be conducted in response to any  
3 major event?

4                   **MR. PETER SLOLY:** Yes, that was a best practice  
5 that I had learned and developed over the course of my tenure in  
6 Toronto and other areas. It was something that was, to some  
7 degree already -- significant degree already in place here in  
8 Ottawa. But I wanted it at the highest level possible. And I  
9 think Deputy Chief Ferguson -- Acting Deputy Chief Ferguson gave  
10 that in her testimony, that that was a clear expectation that I  
11 had made coming in.

12                   **MR. FRANK AU:** Now, we've heard from Deputy Chief  
13 Bell that in this case a threat risk assessment was in fact  
14 conducted. So if I could take you to the document, OPS00003073.

15                   Actually, this is not the threat assessment, but  
16 this is an email you wrote after reading the threat assessment.  
17 Do you recall having read the threat assessment that was  
18 prepared?

19                   **MR. PETER SLOLY:** I've seen a document in  
20 disclosure that is titled Threat Assessment. I don't recall  
21 receiving and reading that document. I did read the Threat  
22 Assessment that was embedded in the Pre-arrival Operational Plan  
23 that I received on January 28<sup>th</sup>.

24                   **MR. FRANK AU:** Right. So now this one -- this  
25 email chain, the part that was sent by you, was dated January  
26 26, so -- and if we go -- so you see that -- actually, if we go  
27 down further to see the origin of the chain. So -- not so --  
28 not so far.



1 Do you remember receiving an email from a  
2 concerned citizen about the potential violence of the upcoming  
3 event? And if we scroll up, you forwarded this email to your  
4 Deputies, and you outlined a concern.

5 If we scroll down to the next page, you describe  
6 what the concern was and then you said:

7 "Yet our briefing note as of last night  
8 says that there is no intelligence to  
9 indicate that this demo straying will  
10 be violent?"

11 **MR. FRANK AU:** And you issue this guidance:

12 "Please review all available  
13 information/intel/incidents and ensure  
14 we have the most accurate threat  
15 assessment, and the most appropriate  
16 operations plan for the event."

17 **MR. FRANK AU:** Now, it's not entirely clear from  
18 this email whether or not you've read a threat assessment, but  
19 you were certainly aware that there was one, or ---

20 **MR. PETER SLOLY:** Yeah, what I'm referring --  
21 sorry ---

22 **MR. FRANK AU:** Okay.

23 **MR. PETER SLOLY:** Thank you, sir.

24 What I'm referring to, I believe, is it just a  
25 briefing note. I don't know what that would have been in the  
26 form of. It could have been an email that was sent around  
27 before, last night that had -- that that said there was no  
28 intelligence to indicate this was going to be violent. But it

1 wasn't the threat risk assessment document in any of its  
2 versions that I was referring to.

3 **MR. FRANK AU:** I see.

4 **MR. PETER SLOLY:** And I laid out a series of, I  
5 guess, it's four points here of data that had come into my  
6 awareness over the course of the night into the morning,  
7 including the email that I forwarded, that would suggest  
8 opposite. So it was, again, just a reminder; there's  
9 contradictory information, just make sure that that is  
10 incorporated into the overall threat risk assessment, and that  
11 is as optimal as it can be, so that the plan can be as optimal  
12 as it can be.

13 **MR. FRANK AU:** Now -- so this is dated January  
14 26. I want to show you an Intelligence Assessment, conducted by  
15 Sgt. Chris Kiez, on January 25<sup>th</sup>, and perhaps you can take a look  
16 and let us know if you have reviewed that document. The  
17 document number is OPS00003086.

18 In the production we receive, we've seen a couple  
19 of different versions. I assume that this -- the assessment was  
20 updated as the week unfolded, but this is Version 1. Does this  
21 ring any bell, this ---

22 **MR. PETER SLOLY:** It's the first time I'm seeing  
23 the document, sir.

24 **MR. FRANK AU:** Okay. If I could take you to page  
25 5. So the third bullet, the author says that:

26 "In 6 years of working large  
27 demonstration events from the  
28 intelligence point of view, the writer

1 has never seen such widespread  
2 community action, which means three  
3 things for planners.  
4 [First, in the event] -- the event is  
5 likely going to be bigger in crowd size  
6 than any demo in recent history,  
7 possibly on par with Canada Day events,  
8 but more destructive.  
9 [Second] There is significant popular  
10 support for this event on a scale of  
11 not seen in recent years. This means  
12 the protest groups have access to  
13 larger protesters pools than they have  
14 ever had access to, which means there  
15 will be likely widespread  
16 disorganisation and confusion.  
17 [Third] Local area bandwidth for  
18 cellular/mobile devices will be  
19 impacted significantly, causing  
20 communications issues for both the  
21 police and the event organizers.  
22 Planners should be ready to have police  
23 radios on hand to avoid clogged  
24 cellular networks."

25 This is an example of the intelligence unit  
26 providing relevant intelligence to guide the planning of the  
27 events, right?

28 **MR. PETER SLOLY:** Yes, sir.

1                   **MR. FRANK AU:** So it's a -- it's an example of  
2 how it's supposed to be done. But there are suggestions here  
3 that this event is unlike some of the other recent events.  
4 There are signals here; do you agree that it may be  
5 unprecedented?

6                   **MR. PETER SLOLY:** At this point I wouldn't say  
7 unprecedented. I think he's -- actually, Sgt. Chris Kiez is one  
8 of our best Intelligence operators; I had a chance to interact  
9 with him quite a bit when I was at the Police Service.

10                   I think he actually uses some very important  
11 language here that caveats his comments. Talks about "recent"  
12 years, "not ever". And he does that several times in here.

13                   The -- what he is describing is very accurate.  
14 We're seeing, generally in protests, I'd suggest over the last  
15 15 years, in the age of social media, a greater level of  
16 mobilization. And increasingly last decade, a greater level of  
17 -- a variety of funding and logistical support. This email took  
18 me back to Idle No More, the -- oh, my gosh, my memory's failing  
19 a little bit, Commissioner, sorry, but the Occupy Movement,  
20 where these sort of sentiments, crowd size, crowd dynamics,  
21 logistics, mobilization, larger disaffected populations,  
22 polarized populations that would give direct or indirect  
23 support, would directly protest or indirectly protest. I'm  
24 slowing myself down a little bit here. These were elements that  
25 we had seen. What Sergeant Chris Kiez is saying in here, my  
26 interpretation of it, is that the planners need to be aware this  
27 is likely going to be bigger than recent events. He didn't give  
28 a timeframe. Is that two years? Is that 10 years? And so we

1 need to be cognizant. So it's a good alarm bell, but it's not a  
2 five alarm that he's ringing right now.

3 **MR. FRANK AU:** It's a warning for ---

4 **MR. PETER SLOLY:** A very ---

5 **MR. FRANK AU:** --- trouble ---

6 **MR. PETER SLOLY:** --- very healthy warning.

7 **MR. FRANK AU:** And the last line that was bolded  
8 in the last paragraph,

9 "As a result, law enforcement is being  
10 met with numbers of people beyond the  
11 norm."

12 That's what you're saying, a larger crowd size.  
13 What would you expect your deputies to do with this kind of  
14 warning?

15 **MR. PETER SLOLY:** Well, first of all, the  
16 deputies would ensure that this information is being shared  
17 amongst the planners, as was directed from an Intelligence  
18 operator over to the planners. I would want to know that they  
19 had sufficient systems in place, that when a briefing note like  
20 this was produced, that it would go from the Intelligence  
21 Directorate to the Planning Team, and that it would be, again,  
22 used in real time as they were developing plan in real time.  
23 And these are real time systems. It's not one first and then  
24 the other. In real time, information is coming in, very fluid,  
25 very fast moving, very complex situation.

26 My sense from the briefings that I was getting  
27 was that that process was in place, and it was functioning  
28 sufficiently.

1                   **MR. FRANK AU:** Would you expect your deputies to  
2 brief up and give you the warning?

3                   **MR. PETER SLOLY:** On a specific level like this,  
4 no.

5                   **MR. FRANK AU:** Okay. So let's go to another  
6 document. Now, first of all, let me ask you, the -- since you  
7 were reading the Hendon report, do you recall if there is any  
8 Hendon report that you could identify that would suggest that it  
9 was a weekend event as opposed to prolonged events involving a  
10 week or month?

11                   **MR. PETER SLOLY:** I saw Hendon reports that had  
12 elements of both, sir. Again, elements of both. And the  
13 totality of all of the Hendon reports that were specifically  
14 prepared on the topic of the convoy events prior to the arrival  
15 of the events themselves, I would literally have to go back  
16 through them all. And I think you and I have talked about this  
17 in previous interviews. A line in one report, unless you've  
18 read the entire report, can be misleading. One report, unless  
19 you've read all the reports, could be misleading. So it's the  
20 totality of the information. And even then, the Hendon  
21 reports, as excellent as they were, and, Commissioner, I want to  
22 be clear, I've expressed my gratitude to Commissioner Carrique  
23 on multiple occasions, even after my resignation, about the  
24 quality of the intelligence support that we received from the  
25 OPP and specifically around the quality of the Hendon reports.  
26 But in the totality, sir, I do not recall, and to this day, even  
27 with the benefit of hindsight, I do not have any clear  
28 impression or saw any clear conclusions that we were going to

1 have anything more than what I was being briefed on by my team.  
2 This was going to be a Thursday, Friday, mainly Saturday, Sunday  
3 event, with the potential for a smaller group to remain behind,  
4 but in numbers that we had managed previously.

5 **MR. FRANK AU:** Let me show you one example from  
6 the January 25<sup>th</sup> Hendon report and see how you may interpret this  
7 report. OPP00001108. We go to page 3, please? Go down.

8 So do you see the section that starts with  
9 "intelligence gaps"? First of all, what do you understand  
10 intelligence gaps to mean?

11 **MR. PETER SLOLY:** Known unknowns. They know they  
12 need some information, but they do not have the information and  
13 therefore can't validate the other parts of the assessment and  
14 that there needs to be some effort to acquire that information  
15 and convert it into intelligence sufficient to close one or all  
16 of the gaps.

17 **MR. FRANK AU:** So if we look at the first few  
18 bullets, first of all, "Participant numbers - online indicators  
19 are unreliable." So this is a known unknown. They knew that  
20 they needed the number, but they knew that they didn't have the  
21 number; is that right?

22 **MR. PETER SLOLY:** That's how I interpret it, sir.

23 **MR. FRANK AU:** And then the next two bullets have  
24 references to specific dates.

25 "Nature of activities in Ottawa by  
26 advance convoy participants. ([January  
27 28<sup>th</sup>, January 29<sup>th</sup>])"

28 So when these days are referenced in these

1 reports, what do you take them to mean?

2 **MR. PETER SLOLY:** That we're going to have two  
3 days of activities. That they don't know what those activities  
4 will be on those two days.

5 **MR. FRANK AU:** That's right. They don't know  
6 what may happen on those days. Could we infer from this bullet  
7 that things were only going to happen on these two days?

8 **MR. PETER SLOLY:** No.

9 **MR. FRANK AU:** What about the third bullet?

10 "Events possibly scheduled at  
11 Parliament Hill on [the 30<sup>th</sup> of  
12 January]"

13 The same; right?

14 **MR. PETER SLOLY:** Yes, sir.

15 **MR. FRANK AU:** So we know from this that the  
16 police didn't really know what would happen on that date, but we  
17 cannot infer from this bullet that these are the only dates when  
18 things would happen.

19 **MR. PETER SLOLY:** You're absolutely right. In  
20 the larger context of all of the Intelligence information --  
21 sorry, what was the date of this report again?

22 **MR. FRANK AU:** Twenty-fifth (25<sup>th</sup>) of January.

23 **MR. PETER SLOLY:** I'm certain that by the 25<sup>th</sup> of  
24 January, we were into the cycle of briefings where this is a 3,  
25 4-day event, mainly the Saturday, Sunday, so even at the point  
26 where these known unknowns were being listed, while we couldn't  
27 tell you what the agenda of the activities were going to be,  
28 there would be some activities. There would be people



1 demonstrating in the city. It would involve some level of  
2 vehicular traffic, likely involving large trucks. But you're  
3 right, none of the information in these known unknowns fills in  
4 hour by hour or block by block of time as to what exactly would  
5 take place.

6 **MR. FRANK AU:** Right. So this is January 25<sup>th</sup>.  
7 And then on the 27<sup>th</sup>, as we get closer to the first weekend  
8 arrival, you attended a meeting with your Command Team, as well  
9 as the Legal Services. If I could take you to document number  
10 OPS00014559 and page 1, please?

11 So if we scroll down slightly, do you see the  
12 last bullet? So first of all, a bullet that says "Chief  
13 questions." It sounds like at this meeting you asked some  
14 questions in the four sub-bullet,

15 "Interdict tow truck equipment prior to  
16 it being used against us. Heavy  
17 equipment within convoy to take down  
18 barriers - a level of preplanning we  
19 don't normally see. Concern they have  
20 this for something that is supposed to  
21 be lawful."

22 Is it fair to say that, by this date, you had  
23 some concern for, given the presence or anticipated presence of  
24 the heavy equipment when it was supposed to be something lawful,  
25 you were questioning why are these equipments there?

26 **MR. PETER SLOLY:** Yeah, that actually almost  
27 reflects I want to say word by word, but certainly the sentiment  
28 of some of the intelligence that was in the Hendon reports. I

1 can't remember the date of that. I do believe, and, again, I  
2 stand to be corrected, Commissioner, evidence in-Chief was led  
3 by Interim Chief Bell that talked about the heavy equipment.  
4 There were efforts made to interdict, to prevent that from  
5 coming in or at least mitigate it. And I believe he said that  
6 this is not information I had as the time of Chief, so I'm  
7 relying on Interim Chief Bell's testimony, that in fact much of  
8 that heavy equipment did not make it into the downtown core and  
9 he described differently some of the equipment that did make it  
10 down there than what has been reported on previously in media.

11 **MR. FRANK AU:** So as the Chief, you had the  
12 strategic oversight, so to speak, and you were asking  
13 appropriate questions to ensure that those deputies who were  
14 reporting to you were doing their job when this kind of concerns  
15 arise; am I correct?

16 **MR. PETER SLOLY:** Absolutely. I mean, it could  
17 be as simple as I think a term that other people have given  
18 testimony on. Just need to kick the tires on different parts.  
19 Just make sure you ask questions at different levels, strategic,  
20 operational, and, yes, sometimes tactical, to make sure that  
21 they're aware of it and they have put some effort into it and  
22 there's a reasonable approach to how they're going to address  
23 it.

24 **MR. FRANK AU:** Now we also understand from the  
25 testimony of Inspector Lucas that there was a potential that the  
26 OPS would be overwhelmed during the weekend of January 29<sup>th</sup> and  
27 30<sup>th</sup>. I can take you to the transcript, but it was in evidence.

28 So I guess my question to you is this. If there

1 are these warning signs and as we progressed towards the  
2 weekend, these warning signals get stronger and stronger.  
3 Shouldn't the OPS have known what was coming?

4 **MR. PETER SLOLY:** To answer your question, no.

5 If you're asking -- and I don't want to interpret  
6 wrongly your question, so if I go in the wrong direction please  
7 pull me back, as the signals became stronger and stronger, what  
8 I would expect is, first I would know the signals were getting  
9 stronger, and clearly, we did.

10 Secondly, that whether I asked about it or  
11 someone offered it, that we would have a constructive discussion  
12 around mitigation for those signals.

13 I can tell you, I think it was -- well, I can  
14 tell you. I think it was the Wednesday that I received my first  
15 formal request through Acting Deputy Ferguson to reach out to  
16 fellow Chiefs of Police and request additional resources.

17 If I'm wrong on the date, Commissioner, I'll  
18 stand corrected, but middle of the week, I reached out to London  
19 Police Service, York, I believe, Toronto asking for general  
20 resource officers, but particularly Public Order officers.

21 It's my recollection, again, I stand to be  
22 corrected, that around this date or on this date, I had another  
23 request to reach out for more Public Order.

24 I believe in Commissioner Carrique's testimony  
25 that he was aware of that request. He had two Public Order  
26 units that were sent to Ottawa.

27 I don't believe they were under our ICS control,  
28 but they were in the Ottawa area and available.

1                   So that is what I would call Inspector Lucas  
2 signalling we might be overwhelmed by the numbers, we'll need to  
3 bolster our abilities to not be overwhelmed. Particularly that  
4 would be Public order assets, and I had a specific request to  
5 get more Public Order assets and I made that request in this  
6 case to Commissioner Carrique. And thankfully, as he did --  
7 provided those resources as quickly as he could.

8                   **MR. FRANK AU:** Now, we heard from Superintendent  
9 Bernier when he testified at the Commission that after he read  
10 the January 27th Hendon Report, he told Superintendent Drummond  
11 about this bizarre disconnect between the Hendon intelligence  
12 and the OPS preparation.

13                   Do you -- do you think that there was a bizarre  
14 disconnect?

15                   **MR. PETER SLOLY:** First of all, while I have the  
16 greatest respect for Inspector Bernier, he was not involved  
17 directly in the planning or the intelligence threat risk  
18 assessment.

19                   Police services and organizations are wonderful  
20 places. Everyone has an opinion.

21                   The briefings that I was getting from the  
22 commanders that had been assigned to the task, the people that  
23 they had assigned through their responsibilities to produce the  
24 information, some of which is displayed on the screen here, did  
25 not indicate that there was a bizarre disconnection.

26                   **MR. FRANK AU:** And do you think your Deputies  
27 were doing the best they could?

28                   **MR. PETER SLOLY:** I think they were. Yes, sir.

1                   **MR. FRANK AU:** And knowing what we know now and  
2 reflecting back on the way that the OPS handled or applied the  
3 intelligence they got, what lessons, if any, should we learn  
4 from that?

5                   **MR. PETER SLOLY:** Thank you. An important  
6 question, Commissioner.

7                   If I'm going -- deviating too far, please pull me  
8 back.

9                   But probably one of my top recommendations for  
10 you to consider, sir, while we had excellent intelligence and  
11 particularly excellent support from the Ontario Provincial  
12 Police, this was, from the very onset, a national issue. It was  
13 a national event.

14                   It started in British Columbia. It was joined on  
15 the east coast and it brought convoys from the southernmost  
16 point in Windsor. Probably the greatest number of participants  
17 and vehicles and vehicles came from our border with Quebec  
18 across the five interprovincial bridges.

19                   The vast majority of the formal intelligence  
20 threat risk assessment reports that we relied on came from the  
21 Ontario Provincial Police.

22                   To this day, I have a question. Why wasn't I  
23 getting intelligence threat risk assessments on a regular basis  
24 of the quality that I got from the OPP from our federal  
25 partners?

26                   And I want to be clear, they contributed  
27 meaningfully and I'm grateful for their contributions. But I've  
28 said this in the Parliamentary committees and I'll say it again

1 to the Commissioner.

2           There's a structural deficit in our national  
3 intelligence threat risk assessment process. I'm grateful for  
4 the Ontario Provincial Police for filling that gap and doing so  
5 to the very best of their ability, but it was not optimal for us  
6 or any other jurisdiction that faced any element of these  
7 events.

8           And one of my recommendations, sir, with great  
9 respect, is that there needs to be an investment in our national  
10 intelligence threat risk assessment structure organizationally,  
11 institutionally, through integrated organizations and  
12 institutions.

13           Some of that will be a financial investment, but  
14 it doesn't all have to be a financial investment. It needs to  
15 be an investment to bring this country truly into the 21st  
16 century where we are two decades, two and a half decades in.

17           **MR. FRANK AU:** Now, in your view, was there  
18 anything that the OPS could have done differently to better  
19 handle the intelligence they did have?

20           **MR. PETER SLOLY:** There is no doubt, sir. And  
21 I'm sure you will ask me multiple times over the course of my  
22 testimony could we have done better. Absolutely.

23           I never had a chance to do a debrief. I suspect  
24 -- I understand that Interim Chief Bell has conducted some or  
25 completed one. I'm not sure of the status. And I'm sure within  
26 that document there will be many, many, many examples of how we  
27 could have done better and need to do better going forward.

28           I believe in his testimony lessons were already

1 learned and applied to subsequent demonstrations, so if you're -  
2 - long way of answering, there's no doubt that we could have  
3 done some things better.

4 **MR. FRANK AU:** But specifically about how it  
5 handled intelligence, anything you can teach us from your  
6 experience?

7 **MR. PETER SLOLY:** Low-hanging fruit, and I  
8 believe it's already been rectified to some degree.

9 A substantive element of our intelligence and  
10 information directorates, I would suggest even in other  
11 functional units and directorates, the ability for us to conduct  
12 open source social media and other online information gathering  
13 with the caveats of *Charter* rights, privacy rights. Absolutely,  
14 that would have to be a very transparent process.

15 I stand to be corrected, but when I became Chief  
16 of Police, we actually had a unit that would have, by  
17 description and definition, fulfilled much of that function.  
18 Not all of it.

19 It was either zero percent staffed or staffed by  
20 one person because we did not have the financial resources to  
21 put human beings into those budgeted positions. We didn't have  
22 the internal skill sets even if we could find a human being to  
23 sit in there.

24 I believe that's been rectified to some  
25 significant degree based on testimony from Interim Chief Bell,  
26 but that is something it took me almost a full year, two years  
27 to convince the Toronto Police Service to do, and this is going  
28 back 2010-2011 after the events of the G20 -- actually, before

1 and after when we finally got our first -- it was called a cyber  
2 group, but really, it was for pre-intelligence and post-  
3 investigative online capabilities.

4           There are very few police services anywhere in  
5 Canada, municipal, provincial. OPP is an exception. I don't  
6 know about Sureté du Québec. RCMP and the OPP are the only --  
7 and Toronto Police Service are the only ones that I would  
8 comfortably describe as a reasonable extending to optimal level  
9 of capability in that area. The Ottawa Police Service did not  
10 have that capability.

11           **MR. FRANK AU:** Okay. Now, a moment ago, in  
12 answering my question, you referenced the need to respect  
13 *Charter* rights. That brings me to my next topic.

14           You'll recall that one of the topics we discussed  
15 during our interviews was your understanding of how the *Charter*  
16 might have limited police options in responding to the arrival  
17 of the convoy.

18           Do you remember those discussions?

19           **MR. PETER SLOLY:** Yes, sir.

20           **MR. FRANK AU:** So if I could take you now to the  
21 interview summary at page 15.

22           If we go to the second paragraph -- sorry.  
23 Scroll down, please.

24           That's right.

25           The paragraph that starts with "Chief Sloly":

26                   "Chief Sloly was advised that based on  
27                   the known intelligence reports, OPS did  
28                   not have the legal authority to deny the



1 Freedom Convoy access to downtown Ottawa  
2 simply because some people disagreed  
3 with the views of some participants. He  
4 understood that OPS did have authority  
5 to close roads and restrict traffic if  
6 there were public safety concerns, but  
7 closures and restrictions had to be  
8 commensurate to actual threats or  
9 reasonably predictable threats. *Highway*  
10 *Traffic Act* or bylaw violations alone  
11 would not be sufficient to justify  
12 restricting access to the city for all  
13 protestors."

14 So that was the view you expressed at the time.  
15 Is that the view you still hold now?

16 **MR. PETER SLOLY:** Yes, sir, with this caveat.  
17 I'm a police officer, not a lawyer.

18 **MR. FRANK AU:** Right. And some of us regret to  
19 be lawyers.

20 Now, since our interview, we've received a legal  
21 opinion provided to the OPS on this issue. So if I may take you  
22 to that opinion. Let me find the document number. It is  
23 OPS00003692.

24 (SHORT PAUSE)

25 **MR. FRANK AU:** Okay. Scroll down, please.

26 Now, you see there's the paragraph that starts  
27 with, "While the convoy has not yet reached the City of  
28 Ottawa..." -- by the way, this memo, I believe is dated January

1 the 28<sup>th</sup>. Deputy Chief Bell requested the opinion on the 27<sup>th</sup> and  
2 got it the next day.

3 So this paragraph says:

4 "While the convoy has not yet reached  
5 the City of Ottawa, various  
6 considerations will need to be  
7 assessed, and reassessed, to determine  
8 the appropriate response, including:  
9 • the balancing of competing Charter  
10 rights;  
11 • impacts to public enjoyment and  
12 the right to mobility;  
13 • impacts to health and safety;  
14 • impacts on obstructing emergency  
15 vehicles; and  
16 • impacts to public safety  
17 generally."

18 Do you remember if you had access to this legal  
19 opinion at the time?

20 **MR. PETER SLOLY:** Yes, sir, I did.

21 **MR. FRANK AU:** So in terms of these bullet  
22 points, they mention the "Impacts to public enjoyment and the  
23 right to mobility." Do I understand that to apply to the right  
24 of the residents to move around freely in the downtown core and  
25 not be impeded unduly by the trucks and commercial vehicles?

26 Your answer ---

27 **MR. PETER SLOLY:** Sorry; yes. Yes. Sorry,  
28 sorry.

1           **MR. FRANK AU:** Okay. And then, "Impacts on  
2 obstructing emergency vehicles"; that's obviously important for  
3 reasons we all understand. And the "Impacts to public safety  
4 generally." So in assessing the options available to the OPS to  
5 respond, including closing roads and, you know, setting up  
6 barriers to the downtown core, these considerations were applied  
7 at the time?

8           **MR. PETER SLOLY:** Well, first of all, just an  
9 observation. Deputy Chief Bell made the request on the 27<sup>th</sup>.  
10 Again, if you recall my earlier testimony, this was a four-day  
11 event, starting on the 27<sup>th</sup>, continuing to the 28<sup>th</sup>, which is the  
12 Friday, with the main events on the 29<sup>th</sup> and 30<sup>th</sup>, the Saturday  
13 and Sunday.

14                   This legal opinion, while helpful to a degree,  
15 arrived technically in the middle of what we were already  
16 dealing with. There were already vehicles in the city, protest  
17 vehicles. There were already protesters and demonstrators in  
18 the city as we were receiving, reading, and considering this.  
19 This did not arrive a week before, or even a day before; this  
20 was already in the middle of the events.

21                   With that caveat, this is helpful. It certainly  
22 articulates to a greater degree what I think most of the police  
23 officers, and even my general counsel, Christiane Huneault,  
24 would have known and could have articulated differently. It's  
25 not definitive; it's advice, not direction. I understand that's  
26 counsel's job, but there isn't a definitive line that says,  
27 "Because there might be any level of any one of these five  
28 points you therefore must go to some substantive interdiction,

1 prevention, blocking of the events that are going to happen."

2           Again, language is important, and I think you and  
3 I have talked about this before. The reference of the lawyer  
4 who draft this says, "The convoy" I believe. There wasn't one  
5 convoy, ever. There were multiple convoys and there were  
6 multiple other individuals and small groups, and I think Supt.  
7 Morris used better language than I will but affiliated groups  
8 that joined or left on a daily basis.

9           I'm always mindful when I read, particularly  
10 advice documents that use a pejorative term, when what we were  
11 dealing with in reality was a massive group of fluid interacting  
12 individuals and groups where there is no one leader, no one  
13 spokesperson and no one thing to deal with. This was helpful,  
14 but not particularly instructive.

15           **MR. FRANK AU:** Now, by the 27<sup>th</sup> of January, am I  
16 correct -- and I believe this evidence came from Supt. Abrams --  
17 that the OPS was expecting somewhere in the range of 3,000  
18 trucks to come to Ottawa, downtown.

19           **MR. PETER SLOLY:** I believe I recall seeing that  
20 number by Inspector ---

21           **MR. FRANK AU:** So with that in mind, I we go to  
22 page 4 of the same opinion; if we scroll down to page 4, please.

23           **MR. PETER SLOLY:** Sorry; ---

24           **MR. FRANK AU:** Yes.

25           **MR. PETER SLOLY:** --- with your indulgence;  
26 Commissioner, with your indulgence? I do want to be clear,  
27 though; what was listed in those five points materially happened  
28 on Saturday, the 29<sup>th</sup>. Those -- I think Deputy Bell gave

1 excellent evidence on his own; I won't repeat his testimony.  
2 But what we saw in terms of a violation of our community's  
3 rights, our business community's rights, the level of  
4 unlawfulness, and assaultiveness [sic], in the broadest sense of  
5 that terms, including the literal sense of that term, was not  
6 what we expected, and was overwhelming, not just for the Ottawa  
7 Police Service; most importantly, it was overwhelming for those  
8 communities that were most directly impacted by those events  
9 that weekend and every other day after that.

10                 So this was helpful because it, to some degree,  
11 anticipated -- anticipated -- that there would be competing  
12 *Charter* rights; there would be significant mobility challenges;  
13 there would be an impact on our emergency services in the ways  
14 that they were described theoretically on the page. So there  
15 was usefulness in this exercise. It was just a little too  
16 little, and already in the middle of the events that were still  
17 unfolding around us.

18                 **MR. FRANK AU:** I guess my next question, after I  
19 take you to the passage I want you to have a chance to consider,  
20 is, what it would be reasonable to anticipate, in light of this  
21 guidance from the lawyer.

22                 So this paragraph starting with "Therefore":  
23                         "Therefore, while the case law  
24                                 indicates that those who wish to  
25                                 protest have a Charter-protected right  
26                                 in doing so, it is not without limits.  
27                                 These limits, as the courts have  
28                                 recognized, prevent threats of

1 violence, acts of violence, and  
2 unlawful conduct. Moreover, these  
3 limits also prevent demonstrators from  
4 obstructing travel on roadways. It is  
5 worth noting, however, that there has  
6 been at least one decision where it was  
7 found that a blockade for a very brief  
8 period only constituted a minor  
9 inconvenience and was therefore  
10 permissible.”

11 So this paragraph referenced the need to be  
12 preserve travel on roadways as a way to limit whatever other  
13 competing rights the protesters may have for free assembly and  
14 free expression and so on.

15 So having this in mind, can you help me  
16 understand why when upward of 3,000 commercial vehicles and  
17 trucks are expected to arrive in downtown Ottawa, that this  
18 wouldn't put some limits on where those trucks could access in  
19 downtown Ottawa?

20 **MR. PETER SLOLY:** Thank you. And as I'm  
21 reviewing this document and we're having this dialogue; all of  
22 these things were actually within the operational plan. I  
23 believe Insp. Lucas has given evidence to you, sir, that he  
24 considered that number; he considered it, that through the  
25 combination of the PLT negotiations engaged by OPP and OPS  
26 officers, that there were agreements made with as many of the  
27 convoys as possible that would significantly reduce the impact  
28 of such events by parking trucks and arranging bus or rideshare

1 into the downtown core that would alleviate much of this; that  
2 they recognized that emergency lanes need to be kept open; there  
3 were significant amounts of planning, detailed out on the  
4 traffic plan and other plans. Again, evidence led by many  
5 others in that regard.

6                   The Ottawa Police Service were neither ignorant  
7 of this; and, more importantly, they had taken steps to  
8 reasonably mitigate this, based significantly on the  
9 intelligence and information available; and ,as we've heard by  
10 other OPS members, including Insp. Lucas, Deputy Chief Bell,  
11 based on the previous experience they had with similar types of  
12 events in a reasonable similar timeframe. So I think, again,  
13 this was an informative document; it validated much of what we  
14 were thinking; it provided a more clearly articulated legal  
15 basis for what we were thinking; and we put in place the  
16 mitigation pieces that I felt were reasonably presented to me in  
17 advance of this, and we had the support of an excellent group  
18 from the OPP and their PLT as well.

19                   We've heard that unfortunately, the majority of  
20 those agreements were broken.

21                   Let me be careful of my language, and I believe,  
22 sir, it was Insp. Lucas that gave an insight that I was only  
23 aware of in his testimony. I believe it was the Windsor convoy  
24 that arrived first, and largest, into the city and occupied the  
25 majority of the red zone area along the Parliamentary district.

26                   Once that happened, the convoy's -- again,  
27 relying on Insp. Lucas's testimony, if I get any of this wrong,  
28 I will walk that back. But once that happened, Insp. Lucas

1 described something, I think he called it, like, a chaotic  
2 scramble of convoys breaking off and going anywhere. The  
3 traffic plan collapsed. The extra resources held in reserve had  
4 to be immediately actioned to try to get the agreements that  
5 were in place, get the trucks to the designated parking zones.  
6 None of that was accomplished in the morning of, and I guess the  
7 early afternoon of Saturday the 29<sup>th</sup>.

8           The Windsor group had claimed, for the most part,  
9 Wellington Street and the Parliamentary District, and everybody  
10 else wanted to get as close to that as possible. I shouldn't  
11 say everybody else. A lot of other participants for almost the  
12 full duration of that event, tried to get to that most prized  
13 and prolific public place. And that was another complicating  
14 factor on our operations, our traffic plans, our PLT operations,  
15 even our POU operations.

16           So I think we had an informative legal opinion  
17 sought at a reasonably early opportunity, received literally in  
18 the middle of the event, certainly within less than 24 hours.

19           Stop me if I'm going on too much, sir.

20           But my last point in this, and it's a what-if,  
21 and I don't want to engage in too much conjecture, but other  
22 witnesses have provided this what-if. I believe Deputy Chief  
23 Bell talked about this.

24           Assuming that even on the 28<sup>th</sup>, Commissioner, that  
25 we decided to lock down the city, close off all the  
26 interprovincial bridges and the offramps from the 416 and 417  
27 highways, we would have needed, in Deputy Chief Bell's  
28 estimation, 2,000 officers. I think it would have actually been



1 more.

2           Even if that was our wish, even if that was the  
3 clearest conclusion that came from any of the Hendon Reports or  
4 any other combination of intelligence or legal opinions, on the  
5 28<sup>th</sup> of January, we were not going to get 2,000 extra officers  
6 into the city and deployed on a plan that could execute and  
7 implement anything that relates to this.

8           **MR. FRANK AU:** Now, you pointed out that this  
9 became the reality as of the 28<sup>th</sup>. It materialized, in your  
10 words, on ---

11           **MR. PETER SLOLY:** On the 29<sup>th</sup>, sir. Sorry.

12           **MR. FRANK AU:** Oh, the 29<sup>th</sup>. But isn't it fair to  
13 ask that by the 27<sup>th</sup>, when OPS knew that 3,000 vehicles were  
14 coming to Ottawa and much of the online messaging suggests that  
15 the protests had an intent to stay for as long as the mandates  
16 were not lifted, why isn't it predictable and why shouldn't the  
17 OPS be acting on this advice to take active steps to mitigate  
18 access to the downtown core?

19           **MR. PETER SLOLY:** Two things. First of all, we  
20 did take active steps. Roads were closed. We've heard repeated  
21 testimony from OPS and OPP senior officers that there were  
22 efforts to manage the convoy's on-route and on the King's  
23 Highways. A new term. I'm so used to the Queen's Highways.  
24 But the King's Highways.

25           And so there were mitigation efforts.

26           Second thing, and it does relate to the first,  
27 the biggest mitigation effort was the work of the excellent PLT  
28 teams, from the OPP, which is best in class PLT program in the

1 country. I hope I haven't disrespected my RCMP colleagues, but  
2 that's a humble opinion. Take it for what it's worth. They  
3 have an excellent PLT program.

4 But our PLT was engaged. I believe from  
5 Commissioner Carrique's evidence, or it might have been  
6 Commissioner Abram's evidence, engaged as the western convoys  
7 crossed Manitoba, and they were engaged with all the other  
8 convoys. So PLT had negotiated, in good faith, and had received  
9 good faith agreements, small A agreements, because I don't think  
10 it's a contract, that the 3,000 trucks would be mitigated  
11 substantially by their willingness to move those trucks into  
12 pre-designated areas and carpool, for lack of a better term,  
13 into the core. They had agreed not to block the emergency  
14 lanes. We had no indication, even on this date, that we were  
15 going to have the type of public display of unlawfulness, a  
16 terrible term, and my English teacher will turn over in grave,  
17 assaultiveness [sic] in the broadest sense, sensory, as well as  
18 physical. Hate related incidents that we saw materialize and  
19 metastasize on the 29<sup>th</sup> into the 30<sup>th</sup> and beyond.

20 **MR. FRANK AU:** Let me ask you now, from your  
21 perspective, how did that weekend unfold?

22 **MR. PETER SLOLY:** That was ---

23 **MR. FRANK AU:** Tell us about the events.

24 **MR. PETER SLOLY:** --- fast and furious.

25 **MR. FRANK AU:** Right.

26 **MR. PETER SLOLY:** In preparing for today, I read  
27 through some of my notes and I think I shared with my counsel, I  
28 was reading the 9:00 o'clock briefing on the Saturday morning.

1 Whether you find this as validation or not, Commissioner, but  
2 the 9:00 o'clock briefing that I received on the Saturday  
3 morning, the 29<sup>th</sup>, was still talking about a weekend event. It  
4 described we might have a tent city at the end of this. Tent  
5 city in the vernacular, meaning that we would have some five,  
6 six, seven, eight, maybe 20 tents somewhere in an NCR park,  
7 Confederation Park, and that we would need to remove it, as we  
8 had in previous ways. And I'd seen that done during my tenure.

9           There is a bit of a back and forth that I'm  
10 quoted in as saying, well, can we make sure that we have our  
11 ESU, which is our Emergency Services Unit, down on the ground,  
12 and when everybody -- when anybody brings out a tent, can we, in  
13 a very smiling and polite way, ask them not to put their tent up  
14 so we have less work to do after the weekend? That is literally  
15 the substantive assessment. Traffic plan is working, PLT  
16 agreements are in place, convoys are arriving, officers are  
17 ready to go, INTERSECT is stood up, NCRCC is stood up, and we  
18 might have a bit of a tent city to deal with. That is  
19 consistent with all of the briefings, intelligence, and  
20 operational, on balance, in summary, that I had been receiving  
21 up until that point.

22           That wasn't the case probably by 11:00 o'clock in  
23 the morning. It happened that quick.

24           **MR. FRANK AU:** M'hm. What happened by 11:00?

25           **MR. PETER SLOLY:** My understanding and my  
26 observation was by 11:00 o'clock, we had a significantly  
27 embedded, clearly beginning to occupy, and in some cases  
28 fortify, elements of Wellington Street, the Parliamentary

1 District, and other parts of our downtown core, that we were not  
2 able to maintain the agreed level of cooperation with the  
3 various convoys and that the traffic plan and the staffing and  
4 reserve staffing was significantly, if not already, fully  
5 exhausted.

6 I do not have the detailed descriptions that have  
7 been provided in testimony here around what was taking place in  
8 the NCRCC, and I can't validate or invalidate the level of chaos  
9 and potentially the occasional F-bomb that might have been  
10 thrown around in that room of dedicated professionals who were  
11 having been, excuse my term, punched right in the nose and  
12 engaged in a standing eight count, trying to get the city back  
13 to a level of safety as quickly as they can, and also trying to  
14 keep our Ottawa Police Service members and our partner agency  
15 members, our city workers, residents, business owners as safe as  
16 they possibly could in a set of circumstances that, at this  
17 point, sir, clearly was unprecedented. Clearly was  
18 unprecedented.

19 **MR. FRANK AU:** So are you describing the events  
20 of the 29<sup>th</sup>?

21 **MR. PETER SLOLY:** The morning, early afternoon of  
22 the 29<sup>th</sup>, which essentially stayed on a steady state with varying  
23 degrees of crowd dynamic and other injects, like alcohol and  
24 drugs, into the evening.

25 But that was pretty well the next 72 hours.

26 **MR. FRANK AU:** So at some point on the 29<sup>th</sup>, you  
27 realized that you're confronting something unprecedented?

28 **MR. PETER SLOLY:** Yes, sir.

1                   **MR. FRANK AU:** I believe Insp. Lucas described it  
2 as drinking from the firehose?

3                   **MR. PETER SLOLY:** That's a very polite  
4 description.

5                   **MR. FRANK AU:** How would you describe it?

6                   **MR. PETER SLOLY:** However many convoys there  
7 were, that's how many firehoses were coming. Add 10 more  
8 firehoses for all the other odds and sides that showed up, with  
9 three more firehoses in for the minus 35-degree temperature,  
10 four or five more for the level of fatigue that our officers  
11 already had going into those events, 43 more firehoses for the  
12 level of public trust in policing based on all the events that I  
13 outlined earlier on, and I think that's a more accurate  
14 assessment of the amount of water that we were taking on at that  
15 point.

16                   **MR. FRANK AU:** At the height of the day's events,  
17 how many trucks would you estimate were there?

18                   **MR. PETER SLOLY:** I received an estimate. I  
19 never made the estimate. As high as 5,000 trucks and 15,000  
20 participants is the upper end number that I received -- I recall  
21 receiving on the Saturday. I said 5,000 trucks. I want to be  
22 careful. 5,000 vehicles, predominately trucks, but that might  
23 have included a range of other vehicles that I can't detail for  
24 you.

25                   **MR. FRANK AU:** And that's just in the downtown  
26 core?

27                   **MR. PETER SLOLY:** Yes, sir.

28                   **MR. FRANK AU:** What about the emergency lanes?

1 Were they kept open?

2                   **MR. PETER SLOLY:** My understanding through  
3 testimony is that they managed to keep the Wellington lane -- I  
4 always get this confused, the south lane open for much of that  
5 day. I don't know if they lost it for portions or at some point  
6 between the Saturday or the Sunday they lost it or made a  
7 decision to close off Wellington and then create an emergency  
8 lane access egress through other street combinations. I'm not  
9 clear on the details, sir.

10                   **MR. FRANK AU:** As the members of the Ottawa  
11 Police Service began to focus on responding to these events  
12 downtown, what is -- what was the impact on the rest of the  
13 city?

14                   **MR. PETER SLOLY:** That's a very important  
15 question and I think it was touched on at some point in  
16 testimony. The downtown core was like, clearly was the  
17 epicentre and hyper volatile, hyper complex, like I won't be  
18 able to provide adjectives, so I'll just leave it at that. But  
19 you could drive south of the 416, is that right, 417, into  
20 literally still downtown neighbourhoods, and you would hear  
21 honking and you'd see, unfortunately, Canada flags stuck on  
22 vehicles and behaviour that was clearly anti-social, but it  
23 dropped off significantly once you got south of the 417.

24 Further out into the Kanata's and the other parts, there were  
25 probably micro things happening, I'm never really sure of it.

26                   So the City would be aware of it, it would be  
27 obviously on TV. Social media is exploding at this point and  
28 people are dialled in to what's going on, but from a physical

1 standpoint, physical location, you know, 98 percent of it was in  
2 a micro concentration, hyper concentration of activity, and  
3 trauma, unfolding trauma to our community in the heart of our  
4 city, in the heart of the Parliamentary District.

5           And I don't want in any way forget, I know there  
6 are federal representatives here, but the trauma impacted on  
7 federal employees, elected officials, public officials, the  
8 entire infrastructure and ecosystem that represents our Nation's  
9 Capital, the Parliamentary District, and the, I believe  
10 Mr. Champ quoted, 18 or 15,000 residents in that area. I don't  
11 know how many businesses, I know the Rideau Centre was closed.  
12 All of that happened literally within hours, and the relief did  
13 not come I believe until February 17th, 18th or 19th.

14           **MR. FRANK AU:** And we've heard evidence, from  
15 some of the residences and business owners affected, during the  
16 first week of hearing, that from that time on they started  
17 feeling abandoned by the police, by other leaders, and they felt  
18 hopeless, that was one of the adjectives they used, and they  
19 started seeing a kind of general chaos and lawlessness. How  
20 would you describe what was happening? Were those adjectives  
21 accurate?

22           **MR. PETER SLOLY:** First of all, I'll never  
23 challenge the feelings of a member of our community, they're  
24 their feelings, they're as righteous and as accurate as they  
25 need to be for the human being that expressed them. So I'm no  
26 way challenging wherever that sentiment came from.

27           I can tell you that I met with, spoke with,  
28 walked around, and talked with many of the residents, the

1 business owners, I was at a Business Improvement Association  
2 meeting that was referenced by one of the witnesses, and I heard  
3 a range of sentiments. I saw a range of responses from  
4 incredibly resilient and understanding and patient people.

5           An elderly couple, both of them infirm and  
6 wheelchairs, travelling through that minus 35 degree  
7 temperature, stopped me as I was getting out of my SUV, while  
8 doing a live call on a board meeting, on February 1st, I  
9 believe, and talked to me. I had -- I think Chair Deans was  
10 talking, and I was literally talking to this couple, "Chief, we  
11 know your guys are doing the best you can. Please, it's hard  
12 for us to get around the sidewalks. We're trying to do our  
13 shopping. We know this is really tough on your team, please do  
14 your best for us."

15           So yes, I heard expressions of hopelessness, I  
16 heard accusations of abandonment, but I would say the vast  
17 majority that I received directly to me was around resilience  
18 and patience. "Get this thing resolved as quickly as you can,  
19 as completely as you can", but resilience.

20           And a level of understanding as to what the  
21 officers on the ground, and I don't say just officers, the  
22 members of our organisation. The partners that were deployed  
23 already from OPP, RCMP, London, God bless them. I think people  
24 understood how difficult it was, but they didn't see the  
25 situation resolving in a day, in two days. And I think it's  
26 reasonable for people to feel really aggrieved that there isn't  
27 a clear solution or a timeline to a clear solution that they  
28 could tangibly see and anticipate, and we were simply not in a



1 position to provide that to them ---

2 **MR. FRANK AU:** And in addition ---

3 **MR. PETER SLOLY:** --- at that time.

4 **MR. FRANK AU:** In addition to the perspectives of  
5 the residents and business owners, et cetera, since you were the  
6 Chief of the Ottawa Police Service, can you tell us how was the  
7 -- how were the members of the Ottawa Police Service holding up?  
8 Because this was only the beginning. It continued for another  
9 three weeks or so.

10 **MR. PETER SLOLY:** This is always a little tricky  
11 part for me, sorry.

12 **COMMISSIONER ROULEAU:** You want us to take a  
13 break and ---

14 **MR. PETER SLOLY:** Thank you, sir. It's okay.  
15 They were doing their very best under inhuman  
16 circumstances, like the city was, like the community was. It  
17 was too cold and it was too much. But they did their very best.  
18 And I'm grateful to them. And they should be  
19 celebrated. Not celebrated, that's the wrong word. They should  
20 be understood.

21 **MR. FRANK AU:** Do you feel that they were  
22 misunderstood?

23 **MR. PETER SLOLY:** Yes.

24 **MR. FRANK AU:** Could you elaborate on that?

25 **MR. PETER SLOLY:** I think I've given this  
26 testimony in Parliamentary Standing Committees. The level of  
27 disinformation and misinformation was off the charts. It was  
28 crushing to the members' morale, it was crushing to the Incident

1 Command Team's morale, it was crushing to my Executive Team's  
2 morale, I suspect it was crushing to the Board. It was crushing  
3 to everybody.

4 It was unrelenting. It was 24 hours a day. And  
5 I think by the end of the weekend it had become a global story  
6 that mainstream media was following, and none of it was  
7 portraying in any way accurate the hard work of the men and  
8 women of the Ottawa Police Service and the partner agencies that  
9 stood with us. None of it. To this day it hasn't. And that is  
10 very unfortunate because public trust and confidence in any  
11 police service I believe is the number one public safety factor.

12 When any Police Service loses significantly  
13 public trust and confidence, that in of itself is a massive  
14 public safety threat and risk. It materialises in so many ways.  
15 I don't know if the Commissioner wants me to expand on that, but  
16 I'm happy to do so.

17 And unfortunately, as quickly as the events  
18 unfolded on the morning and the afternoon of the Saturday,  
19 public opinion against the Ottawa Police Service and its members  
20 turned just as quickly and to the same unprecedented levels that  
21 were unrelenting, at least from my entire experience, up until  
22 February 15th.

23 **MR. FRANK AU:** Now, you spoke of how the officers  
24 were misunderstood. Let's hope that this Inquiry will be the  
25 beginning of that understanding.

26 Commissioner, could we -- would this be a good  
27 time to take a recess?

28 **COMMISSIONER ROULEAU:** If you would like, sure,

1 we can take the morning break for 15 minutes.

2 **THE REGISTRAR:** The Commission is in recess for  
3 15 minutes. La Commission est levée pour 15 minutes.

4 --- Upon recessing at 11:02 a.m.

5 --- Upon resuming at 11:17 a.m.

6 **THE REGISTRAR:** Order. À l'ordre.

7 **COMMISSIONER ROULEAU:** No, it's okay. There's no  
8 need to stand.

9 **MR. PETER SLOLY:** It's just respect for your  
10 profession.

11 **MR. FRANK AU:** Good morning, Commissioner.

12 **COMMISSIONER ROULEAU:** Okay. Go ahead.

13 **--- MR. PETER SLOLY, Resumed:**

14 **--- EXAMINATION-IN-CHIEF BY MR. FRANK AU (Cont'd):**

15 **MR. FRANK AU:** So before the break, Chief Soly,  
16 you were telling us about the events of that first weekend and  
17 how it hit everyone really hard. I'd like to take you now to  
18 January the 31<sup>st</sup>, which I believe is the Monday after?

19 **MR. PETER SLOLY:** Yes, sir.

20 **MR. FRANK AU:** We've heard from Deputy Chief  
21 Ferguson that that was when the Executive Team realized that a  
22 lawful protest has now turned into an illegal occupation. That  
23 was her evidence, and I'm interested in your view on that.

24 **MR. PETER SLOLY:** My view is it was unlawful the  
25 moment a law was broken in or relation to the events. And so  
26 for me, that was clearly the Saturday morning. I don't want to  
27 in any way interpret Deputy Chief -- Acting Deputy Chief  
28 Ferguson's impression. I think I would position the 31<sup>st</sup> as we

1 now know this is going to be a longer-term occupation. There  
2 are fortifications and there are -- there is alarming level of  
3 public safety issues at large and we're going to have to pivot  
4 our plan to now address the current context and near future  
5 context that we're going to be dealing with. So it's in that  
6 context that perhaps -- again, I don't want to misinterpret, but  
7 perhaps the full Command is fully on the same page and the  
8 Incident Command Team is pivoting the plan now into the next  
9 phase of this occupying period.

10 **MR. FRANK AU:** Tell us about that pivot. What  
11 did the Executive Team decide to do?

12 **MR. PETER SLOLY:** I don't know if there's any  
13 significant decision. I mean, we needed a much -- we needed a  
14 significant update on the intelligence threat risk. Much of  
15 that was in place in the buildup and iterations, but we now need  
16 it to escalate to another level. And again, that cycle of  
17 intelligence threat risk assessment to then feed the pivoting  
18 operational plan to what extent are we going to need different  
19 resources, greater levels of resources in one area versus  
20 another area, and to what extent do we need to build out sub-  
21 plans and other things. For me at the Chief of Police level is  
22 what resources are we going to need. What do I now need to do  
23 to inform and/or engage other levels including the oversight  
24 body of the Ottawa Police Services Board, the City of Ottawa and  
25 other factors.

26 And I will be -- I was still trying to understand  
27 really what had just arrived in our city, what really was it,  
28 and even just level set my own understanding, never mind the

1 work that was being done on behalf of me through Deputies Bell  
2 and Acting Deputy Ferguson.

3 **MR. FRANK AU:** Deputy Bell described that first  
4 week as a period of orientational reorientation. Do you agree  
5 with that description?

6 **MR. PETER SLOLY:** I understand -- I think I  
7 understand the theme behind it. I would probably use different  
8 language, but I think it's definitely a what just happened, how  
9 do we now need to reorient, to reassess, and then start to  
10 address the situation going forward.

11 **MR. FRANK AU:** So before the convoy arrived,  
12 we've seen an initial plan dated January the 28<sup>th</sup>?

13 **MR. PETER SLOLY:** Yes, sir.

14 **MR. FRANK AU:** What was the understanding now in  
15 terms of going forward in terms of the need for a new plan?

16 **MR. PETER SLOLY:** Well, there was no need for a  
17 new plan. There was a need for an evolution of the plan that we  
18 had, an evolution of the threat risk assessment that was in that  
19 plan. Again, I want to make it clear, there was only ever one  
20 plan. There were many iterations of it. There was only ever  
21 one threat risk assessment. There were many iterations of it.

22 **MR. FRANK AU:** So what was the understanding then  
23 about this -- the need for this new evolved plan?

24 **MR. PETER SLOLY:** On the Monday the 31<sup>st</sup>?

25 **MR. FRANK AU:** Yes.

26 **MR. PETER SLOLY:** Probably the number one thing  
27 at that point was staffing, staffing, staffing, staffing.

28 **MR. FRANK AU:** And how did you go about achieving

1 that?

2                   **MR. PETER SLOLY:** Again, without the -- with the  
3 absence of my notes, but as simple as how many more officers can  
4 we redeploy from our overall complement of policing a city of a  
5 million people in the nation's largest municipal geography to  
6 that micro-ore of the red zones and the immediate neighbourhoods  
7 around it. I think, by that point -- again, I stand to be  
8 corrected if the records say otherwise, but that point, we had  
9 already started to look at changing our shift hours to create a  
10 greater volume of officers available, officers and civilian  
11 members. I don't know if we had, at that point, reached out to  
12 the Association, the Ottawa Police Association to start to  
13 negotiate a whole different shift schedule. That might have  
14 come later on in the week, but that was the focus, and then  
15 external resource requests that went to OPP and other police  
16 services to send additional resources atop of what they had  
17 provided us already.

18                   **MR. FRANK AU:** So around that period, January 31<sup>st</sup>  
19 and the next few days, did the OPS start reaching out to other  
20 external agencies for help?

21                   **MR. PETER SLOLY:** Yes, absolutely.

22                   **MR. FRANK AU:** Tell us what steps you or the  
23 other members of the second team did?

24                   **MR. PETER SLOLY:** Predominantly, it sort of  
25 happens at two levels. You know, the agency-to-agency  
26 relationships would already be, you know, phone calls and text  
27 messages to people that they knew in other agencies. You know,  
28 you'll get something formal from the Chief, but we need X, Y and

1 Z. And then the formal request would come up through Acting  
2 Deputy Chief Ferguson and then I would make a reach out to the  
3 respective agencies. So probably my approach for the main may  
4 have deviated every now and then, would be a text message to the  
5 Chief of Police or Commissioner, saying that you'll be getting a  
6 formal request, but I'm looking for X or Y or Z. And then my  
7 executive assistant would produce the document and I would  
8 forward that formally. But once I got a positive response, the  
9 positive response I would then forward to our Legal Services  
10 Department, and they would go through the process of enabling a  
11 memorandum of understanding, an MOU.

12 **MR. FRANK AU:** And now I want to get a better  
13 understanding of the options that were open while the OPS were  
14 reaching out for external help. So I want to take you to a  
15 document, OPS00005631.

16 So just looking at the top, it says "Public Order  
17 Truck Convoy De-escalation Planning Meeting February 1<sup>st</sup>, 2022."  
18 Do you have -- perhaps we can scroll down a little, so you can  
19 familiarize yourself. It says that there's a meeting with the  
20 Chief. Can we go down further? There are a number of  
21 discussion points.

22 So, for example, the third bullet, there's a  
23 notation that,

24 "Every single option to be explored and  
25 is open to discussion.

26 He is happy to come back and further  
27 discuss anything that we need him to."

28 He, I take it, refers to you?

1           **MR. PETER SLOLY:** Yes, sir.

2           **MR. FRANK AU:** So if we go down further,  
3                           "PLT would like one more attempt to  
4                           speak with every convoy to get them on  
5                           the same page."

6           We scroll down further,  
7                           "Every POU we ask for will not be  
8                           released to come to Ottawa as protests  
9                           happening now everywhere. We might not  
10                          get the staffing numbers we ask for."

11                        So there are a couple of things I wanted to ask  
12 you to comment on. First of all, there's a reference to things  
13 happening elsewhere. What can you tell us about that?

14                       **MR. PETER SLOLY:** I believe by the 31<sup>st</sup>, I'm  
15 certain there was -- I'm really off base, but Coutts, Alberta  
16 was already in play at that point. On the Monday, I don't  
17 recall any other Ontario sites. I don't even think the  
18 announcement of the -- no, on the Monday -- oh, sorry, on the  
19 Tuesday, by then, there might have been some sort of indication  
20 that there would be an event in Toronto around Queen's Park.

21                       **MR. FRANK AU:** M'hm.

22                       **MR. PETER SLOLY:** But I don't think there was any  
23 other active sites in Ontario. There were, I believe, some  
24 demonstrations at other provincial capitals across the country,  
25 but for sure, Coutts was active and clearly being televised and  
26 we're seeing I was getting briefings from Commissioner Lucki on  
27 the events out there.

28                       **MR. FRANK AU:** So by this time, which I believe



1 was February the 2<sup>nd</sup> or the 1<sup>st</sup> -- February the 1<sup>st</sup>, I believe,  
2 things are happening elsewhere. And if we go back to the top,  
3 one of the discussion points, do you see the third bullet from  
4 the bottom, it says, "POU units across the province needed."  
5 What does that refer to?

6 **MR. PETER SLOLY:** So maybe I could just give some  
7 context to the meeting.

8 **MR. FRANK AU:** Please.

9 **MR. PETER SLOLY:** So this is the Tuesday. We are  
10 into the -- significantly into the pivot at this point. I had  
11 received varying levels of input, some of them just random  
12 emails, some of them very specific conversations with people  
13 with a lot of experience in unprecedented, unusual public safety  
14 events. And the validation that I was getting from small i  
15 information to large I information based on expertise was this  
16 was unprecedented. This was larger than your police service is  
17 going to be able to handle. It was national, and in some cases,  
18 international in scope. It was fueled by significant funding,  
19 significant misinformation, disinformation and polarization,  
20 just to name a few.

21 This meeting was my first attempt to sit down  
22 with Acting Deputy Chief Ferguson as the Major Incident  
23 Commander. I had invited -- I'd asked for Inspector Lucas to be  
24 at the meeting. He could not attend, and I respect his reason,  
25 although I don't know it specifically. I think Inspector Marin  
26 was sent as his designate, I think, but he was a senior officer  
27 from the ICS team that was there, Staff Sergeant Mike Stoll, who  
28 was the ESU Commander, our POU Commander. And he ---

1                   **MR. FRANK AU:** What does ESU stand for?

2                   **MR. PETER SLOLY:** Emergency Safety Unit, I think,  
3 or Emergency Services Unit. Sorry, it's been a little bit of  
4 time.

5                   **MR. FRANK AU:** It's synonymous with POU, Public  
6 Order Unit?

7                   **MR. PETER SLOLY:** Essentially, but broader -- I  
8 think actually a broader use of trained officers that are  
9 actually more effectively deployed, a really good practice here  
10 that Ottawa should be recognized for, Ottawa Police Service  
11 should be recognized for.

12                   And I had brought with me the two PLT supervisors  
13 because I had information, feedback internally that our PLT  
14 members weren't being optimally used and were feeling out of the  
15 loop of substantive discussions like this. And I had requested  
16 that the two supervisors be there, and they were there, and you  
17 see their contributions later on in the notes.

18                   But this is the substantive first time that I'm  
19 sitting down with the Incident Command thread, strategic,  
20 operational and tactical, asking what are you folks seeing? How  
21 are you assessing this? No decision's being made here. I need  
22 situational awareness. I need your assessment. We had been  
23 blessed with commanders of some expertise and experience from  
24 other jurisdictions that were in that room. I think London was  
25 there, can't remember if Durham. I believe there was an OPP  
26 commander. I can't recall, but there were at least three other  
27 agencies in the room. So it wasn't just us talking to us.  
28 There was a healthy amount of external expertise.

1                   And we went through what I would call -- I won't  
2 say it's a whiteboarding session, but a consultation, discussion  
3 session that I wanted to get at some point to, okay, well, this  
4 is good. Now what's the move forward coming out from this? So  
5 that's the context of this meeting.

6                   I'll pause there if you want to come back to the  
7 question that you wanted me to ask -- answer.

8                   **MR. FRANK AU:** Yes, because I'm interested in  
9 this notation that POU units across the province ---

10                  **MR. PETER SLOLY:** Yes.

11                  **MR. FRANK AU:** --- needed.

12                  **MR. PETER SLOLY:** So around -- I'd say around the  
13 mid point of that meeting, I would have almost turned to Michel  
14 Marin and Mike Stoll, who were sitting to my right, and said,  
15 "What's the level of POU that you would think we would need to  
16 start to dismantle the red zone and end the occupation?" And  
17 then there was, like, a real-time discussion between my folks  
18 and the other POU commanders in the room, but there were others  
19 that were chiming in. It was mainly a POU discussion, and I've  
20 been in them in many other times before, so I know how this  
21 feels. I just sort of sat back and watched this new generation  
22 of experts do their thing, and it was kind of cool to watch.  
23 And within a really short period of time, it was almost  
24 unanimous. This may not be the exact language, but it was close  
25 to it, we're going to need everything in Ontario and a bunch  
26 more from across Canada. That was one of the moments where I  
27 truly understood the scale of what we were facing. Everything  
28 in Ontario and a bunch more from across Canada for me was state

1 visits, an Olympic event, G8, G20. Nothing else requires that.

2 **MR. FRANK AU:** M'hm.

3 **MR. PETER SLOLY:** That's when I truly understand  
4 from people with amazing expertise, from different  
5 jurisdictions, add onto that whatever other resources we're  
6 going to request, that's somewhere already in the range of 6, 7,  
7 800 officers plus investigators, plus boots on the ground  
8 officers, plus dispatchers, analysts, special constables to  
9 handle mass arrests. The number is going to be well north of a  
10 thousand, and it's way more than we will ever be able to supply  
11 within the Ottawa Police Service, within the eastern region of  
12 Ontario, within the province.

13 **MR. FRANK AU:** So that recognition came as early  
14 as February 1<sup>st</sup>?

15 **MR. PETER SLOLY:** Yes, sir.

16 **MR. FRANK AU:** Now, if we go down a little, in  
17 the first box under discussion point, I read a bit from it  
18 earlier,

19 "PLT would like one more attempt to  
20 speak with every convoy to get them on  
21 the same page. Truckers need to clear  
22 all the roads and stop honking in  
23 exchange for fuel and a place to park.  
24 Have zero room to negotiate. If they  
25 don't deal with it in this way, they  
26 will be removed."

27 Why is it that there was zero room to negotiate?

28 **MR. PETER SLOLY:** I don't know. I'm assuming

1 this is the PLT contribution to the discussion, so I don't --  
2 these aren't my notes, and it doesn't seem to be attributed to  
3 one or both of the supervisors. I don't know if this is their  
4 briefing contributing in totality, so I'm not sure what that  
5 means.

6 **MR. FRANK AU:** I was just curious because it  
7 appears that the PLT would like more time, more opportunity to  
8 speak to the convoy and then perhaps there was another view  
9 expressed, no room to negotiate.

10 I was just wondering if you could enlighten us on  
11 what this discussion was about.

12 **MR. PETER SLOLY:** Again, there were some 20  
13 people in the room and it was really an open forum discussion  
14 with people just contributing ideas in a very fluid way.

15 **MR. FRANK AU:** Right. If I could take you now to  
16 the next document, the next day, OPS00014484.

17 So if we go to page 22.

18 Now, Chief Sloly, do you have a practise of  
19 making notes to yourself, sending yourself emails as reminders  
20 or things like that?

21 **MR. PETER SLOLY:** Yes, I do, sir.

22 **MR. FRANK AU:** And would this be one of those  
23 examples?

24 **MR. PETER SLOLY:** Yes, sir.

25 **MR. FRANK AU:** So here, we read, "Advise that all  
26 options on the table needs to consider" ---

27 **MR. PETER SLOLY:** Sorry. Can you -- I'm just not  
28 sure the context or date or time of this, sorry.

1                   **MR. FRANK AU:** Yes.

2                   **MR. PETER SLOLY:** "Call with Mayor", and the time  
3 stamp, at least from the entry, is 1:30.

4                   Okay. Thank you.

5                   **MR. FRANK AU:** And we see a name on the top left,  
6 Maria?

7                   **MR. PETER SLOLY:** Fortunato.

8                   **MR. FRANK AU:** Who's that?

9                   **MR. PETER SLOLY:** That's my Executive Assistant,  
10 or was my Executive Assistant.

11                   **MR. FRANK AU:** So the content of the email, which  
12 is, I guess, note to yourself, says:

13                                   "Advised that all options on the table  
14                                   needs to consider the 'political option'  
15                                   - what role(s) can Premier and PM play  
16                                   in diffusing the demonstration. It is  
17                                   not my legal responsibility to end a  
18                                   demonstration - it is my legal  
19                                   responsibility to provide adequate and  
20                                   effective policing to serve and protect  
21                                   the city/citizens."

22                   What was the purpose of this note to yourself?

23                   **MR. PETER SLOLY:** At this point, I actually  
24 didn't have an assigned scribe, so I was trying in real time to  
25 capture information around conversations that I thought were  
26 important or a point that I was trying to remember, so it's not  
27 a consistent practice with every single meeting that I would go  
28 back and do this. That's the context of the note.

1 I don't know if that answers your question, sir.

2 MR. FRANK AU: And since the subject at the top  
3 says "Call with Mayor" ---

4 MR. PETER SLOLY: Yes.

5 MR. FRANK AU: --- "re Demonstration", does that  
6 capture some of the contents of the call?

7 MR. PETER SLOLY: Some of it. Yes, sir.

8 MR. FRANK AU: On the 2nd of February.

9 MR. PETER SLOLY: Yes.

10 MR. FRANK AU: Now, on that same day, you made a  
11 public announcement that turned out to be somewhat  
12 controversial. Do you know what I'm talking about?

13 MR. PETER SLOLY: I think I can guess what's  
14 coming, sir.

15 MR. FRANK AU: Okay. Give me your guess.

16 MR. PETER SLOLY: There may be not be a policing  
17 solution to this.

18 MR. FRANK AU: Why did you say that?

19 MR. PETER SLOLY: For all the reasons that we've  
20 talked about.

21 The size and scale of the events were not going  
22 to be able to be handled by any one police of jurisdiction,  
23 certainly not mine. That this was a national scope event  
24 started from corners of all parts of Canada and arrived in our  
25 city. It was already, by the 2nd, in several other locations,  
26 Kutz, specifically, I think by the 2nd. There would have been  
27 some indication that Queens Park in Toronto would have been a  
28 location.

1           This was borne out by a wide variety of  
2 polarizing issues, not the least of which was the vaccine  
3 mandates, but there were many other anti-government sentiments  
4 expressed at all three levels of government. And some of this  
5 was just people looking to come into our city and participate in  
6 an event, to have an unruly and, in many cases, unlawful party.

7           This was the underpinnings that created this  
8 event and brought it substantially into our city. We're well  
9 beyond the *Police Services Act* mandate of me as a Police Chief  
10 and the Ottawa Police Service and the police of jurisdiction,  
11 and we were going to have to engage other elements of civil  
12 society and likely all three levels of government to make in  
13 some way a meaningful contribution to a sustainable solution to  
14 the end of it.

15           **MR. FRANK AU:** What was the context in which you  
16 made this statement?

17           **MR. PETER SLOLY:** I believe there was a -- I  
18 can't remember if it was a Board meeting or if it was a Council  
19 meeting that the Board was in attendance at. There was a range  
20 of questions for hours, and at some point one of the questions  
21 elicited that response.

22           **MR. FRANK AU:** And how was your comment received?

23           **MR. PETER SLOLY:** If there are 35 million people  
24 in Canada, probably 35 million different ways.

25           **MR. FRANK AU:** Do you feel that you were  
26 understood?

27           **MR. PETER SLOLY:** No. Largely misunderstood but,  
28 by a lot of people, very understood.



1                   **MR. FRANK AU:** And have you had a chance to  
2 reflect on the statement you made since the time you made it?

3                   **MR. PETER SLOLY:** A lot.

4                   **MR. FRANK AU:** And what conclusions have you come  
5 to?

6                   **MR. PETER SLOLY:** It needed to be more clear.

7                   **MR. FRANK AU:** Okay. What did you need to be  
8 more clear on?

9                   **MR. PETER SLOLY:** That the Ottawa Police Service  
10 is doing and will continue to do everything we possibly can do.

11                   Just to be clear, that was literally the  
12 substantive answer I was giving during that meeting. All  
13 options are on the table. We're doing everything we can. We're  
14 calling all the staffing we can. We are rearranging our plan.  
15 We're calling out to our partners.

16                   So before that statement was made -- it wasn't  
17 made in a vacuum. We were hours into a long meeting with  
18 multiple questions from multiple stakeholders. I believe my  
19 Board were present. I stand to be corrected.

20                   City Councillors, the Mayor, "What are you doing?  
21 How are you going to end this? When is it going to end?"

22                   Please understand, we're doing everything we can  
23 and we'll continue to do everything we can on a repeat loop, but  
24 at some point this isn't going to end just by the Ottawa Police  
25 Service.

26                   Even if we could find a way to get all the  
27 resources we need, it's going to come back again next week, the  
28 month after, Canada Day. This is a larger movement or series of

1 movements. This is a trend that's happening across the country  
2 and around the world, and so there needs to be more than just a  
3 policing solution to it.

4 That's the context.

5 Now, I did reflect on it and in the days and  
6 weeks and now months after that I've, in opportunities like  
7 this, expanded on that short phrase. I think there's ample  
8 documentation in my notes, note scribes, to talk about me  
9 explaining this further to the Chair, at Board meetings, in  
10 other conversations and meetings.

11 So I didn't just leave it till now to provide a  
12 more fulsome explanation. Within hours and days of it, I was  
13 trying to provide that more fulsome explanation to my Board  
14 oversight and to other public bodies and civil actors.

15 **MR. FRANK AU:** Now, there are those who may say  
16 that your statement fostered a perception among the public and  
17 the protestors that the OPS was vulnerable and unable to police  
18 the convoy.

19 What do you say to that?

20 **MR. PETER SLOLY:** Again, like my earlier comment,  
21 sir, everyone is entitled to their opinion and is certainly  
22 entitled to their feelings. And I can understand that if that  
23 was the only thing they heard from me and they were not  
24 available to hear all the other efforts I made to clarify that,  
25 that that could leave them with a sense that we'd just given up.  
26 So I'm not challenging that.

27 But let me clear. I don't know if that is  
28 different from any other statement I've made around the role of

1 policing in society. If you recall my earlier comments when I  
2 introduced my approach to policing and how I did it, the police  
3 are not going to solve guns and gangs and drugs on their own  
4 without education, health care, social services, the volunteer  
5 sector, communities themselves.

6           The police are not going to be able to solve  
7 sexual assaults on their own without advocacy groups and  
8 legislative change.

9           So there isn't any major aspect of policing,  
10 crime management, order management, traffic management -- even  
11 traffic management, we can't patrol the amount of highways  
12 unless we have bylaw changes, signage changes, engineering  
13 changes that are well beyond the remit of the police service to  
14 demand and deliver.

15           So for me, this is a consistent theme that I have  
16 spoken on and acted in accordance throughout my entire policing  
17 career. It wasn't, for me, an unusual statement, but it was  
18 heard in unusual and unprecedented circumstances and  
19 misinterpreted broadly, badly.

20           **MR. FRANK AU:** Do you think that the lack of  
21 clarity of the statement might have risked contributing to a  
22 loss of public trust in the ability of the police to respond?

23           **MR. PETER SLOLY:** I can't rule that out, sir, but  
24 I think I made enough efforts after that to clarify that and,  
25 demonstrably, the Ottawa Police Service kept -- with its  
26 partners, kept putting out everything we possibly could for as  
27 long as we could, I would very strongly suggest well past where  
28 we should have been.

1           Our actions should have spoken louder than words,  
2 but unfortunately, by Saturday afternoon, there had been a  
3 cemented narrative and I don't think it ever changed. My  
4 statement probably didn't help it, but I don't think it was  
5 really changeable from that first weekend.

6           **MR. FRANK AU:** Now, we've also heard from other  
7 police leaders who disagreed with the statement from their  
8 perspective, in the way that they interpreted the statement, and  
9 they felt that there was, in fact, a policing solution. And the  
10 way that the occupation was ultimately dismantled proved that  
11 there was a policing solution. What do you say to that?

12           **MR. PETER SLOLY:** Again, if their comment was  
13 based on what was said without the benefit of hearing all the  
14 other explanations, I certainly attempted, through the larger  
15 calls, to establish the things I just talked about.

16           We are still looking -- we are still doing  
17 everything we can. We're seeking all the help we can. And if  
18 we can get 1,800 resources, or whatever number the final amount  
19 is to come in, then we could take care of the unlawful aspects  
20 of this. But there were broader implications and underpinnings  
21 that could bring it back to my city or any other city or  
22 jurisdiction. And so sustainably, to resolve the situation, we  
23 were still going to need larger civil society, all three levels  
24 of government.

25           I don't know if this is the time to interject  
26 around any of the levels of declarations of emergency,  
27 municipal, provincial, or federal, but clearly we had  
28 indications, and I believe that there were assistances from

1 those various levels, the injunction, the private injunction.  
2 And so there are clearly examples where some additional efforts  
3 were needed beyond the efforts of the police to resolve it.

4 Local community mobilized themselves in mostly  
5 constructive ways. In some ways, less constructive. But there  
6 were efforts across the board, from private citizens to public  
7 institutions, that contributed ultimately to that success.

8 While I respect the comments of my peers, I want  
9 to be careful with my language here, I don't know any major  
10 operation, including that one, that did not benefit material  
11 from the supports outside of police organizations themselves.  
12 And I think that's unfair to the contributions made by broader  
13 civil society, including all three levels of government.

14 **MR. FRANK AU:** M'hm.

15 **MR. PETER SLOLY:** I don't know if that's what  
16 they intended in their comments. I want to be clear about that.  
17 but no police organization of any size, operation of any size,  
18 that I've ever been involved with, that had the clear level of  
19 success, no deaths, no serious injuries, no significant damage  
20 to infrastructure, no rioting, no burning police cars.

21 I don't know if any size operation that didn't  
22 materially benefit from the consent and cooperation of  
23 citizenry, the injections of material resources or advice,  
24 expertise, from other experts outside of policing, legislative  
25 change, et cetera, et cetera.

26 **MR. FRANK AU:** M'hm. Okay. So this was on the  
27 2<sup>nd</sup>; right? That you made the statement?

28 **MR. PETER SLOLY:** Yes, sir.

1                   **MR. FRANK AU:** Let's move forward by a few days.

2                   **MR. PETER SLOLY:** I did recall it was the 1<sup>st</sup>, but  
3 I'm not going to quibble.

4                   **MR. FRANK AU:** Right. So let's move forward by a  
5 few days. And we've heard from other witnesses that the  
6 weekends are always the worst. Is that right? In terms of the  
7 surge of numbers.

8                   **MR. PETER SLOLY:** Yes. In terms of the surge of  
9 numbers, and then the extra dynamics of convoys coming in or not  
10 coming in. definitely larger in scale, and more complex.

11                   **MR. FRANK AU:** Right. So I want to show you an  
12 email dated February the 5<sup>th</sup> at 6:33 a.m. The document number is  
13 OPS0007355. I expect it will show an email from you to Acting  
14 Deputy Chief Ferguson.

15                   And by this point, on around the 5<sup>th</sup>, what was the  
16 state of any evolving plan that the OPS had?

17                   **MR. PETER SLOLY:** I think on that date, I  
18 received a briefing on the three options I'd asked for from the  
19 meeting on February 1<sup>st</sup>, the POU options. So that's a  
20 substantive subplan development. By then, we'd had major  
21 changes around our internal staffing capabilities, decisions  
22 around how to redeploy resources around both the events for the  
23 convoy, as well as policing the rest of the City, which still  
24 had to happen on a 24-hour basis, obviously.

25                   We had made announcements around our efforts to  
26 try to address the disorderly, unlawful, and assaultive  
27 behaviour, the hate type behaviour that was happening directly  
28 in the communities most affected around the red zone, variously

1 described as surge and enforce and contain. So those are some  
2 of the examples of overarching -- we were now planning for a  
3 week's cycle, as opposed to a weekend cycle.

4 Requests had gone out to partner agencies not  
5 just for police officers, but for planners, people with  
6 expertise in PLT, POU, recognizing we didn't have the expertise  
7 or the number of people necessary to do the type of planning and  
8 sub-planning that we needed to do.

9 I know I'm going fast, Commissioner, so if you  
10 need to me slow down, I will.

11 So there's a range of activities that are engaged  
12 in involving the prearrival plan into an in-event plan.

13 **MR. FRANK AU:** Well that context is helpful as we  
14 take a look at this document.

15 Can we scroll down a bit?

16 So in this email, you said you have directed  
17 Insp. D'Aoust to convene a full incident command briefing at  
18 8:00 a.m.

19 If we go down further, there's a recap  
20 situational awareness, and then below that, we see some -- two  
21 sets of priorities. First of all, the general priorities has a  
22 couple of points:

23 "Surge, contain and enforce".

24 That's the first point.

25 Second:

26 "Demonstration - fully implement plan -  
27 BUT - close everything (roads, bridges  
28 highway off ramps, etc.) as early and as

1 long as possible"

2 Third:

3 "Shut down/secure enablers for unlawful  
4 and unsafe protest; funds [...], fuel [...],  
5 fun..."

6 I won't read the contents in brackets.

7 Is there a fourth point? Can we go down?

8 Okay. So that's it. the first priority --  
9 general priorities.

10 Explain to us what this is all about?

11 **MR. PETER SLOLY:** So this is the second Saturday.  
12 You'll recall what happened on the first Saturday.

13 Point number two around close everything, at the  
14 meeting that was held, that was qualified, I want to be clear  
15 about that, clearly access and egress -- access into the city  
16 and access into the downtown core was one of the major reasons  
17 why that situation on the first Saturday so quickly escalated  
18 and metastasized into the events that we're feeling right now.

19 It was reasonably predictable at this point that  
20 we were going to have another large influx of convoys, ones and  
21 twos vehicles, and walk across bridges demonstrators that would  
22 again likely overwhelm the number of resources, even at that  
23 time that we had in the city.

24 And so that was a major public safety risk that,  
25 on the second Saturday, was now even more likely to happen. And  
26 so that's the point there.

27 The "Surge, contain and enforce" was announced on  
28 the Friday morning at a media conference. And this was



1 specifically to address the level of ongoing disorderly,  
2 assaultive, hate related behaviour that our downtown communities  
3 and businesses were experiencing, particularly in Councillor  
4 Fleury's ward and Councillor McKenney, although I'm not sure  
5 she's in office now, but former Councillor McKenney, her ward.

6           And the overwhelming amount of community  
7 complaints, business complaints were coming from the unlawful,  
8 assaultive type behaviour in that area, and we needed to -- that  
9 "Surge, contain and enforce" is not for the red zone. That is  
10 for the areas outside of the red zone.

11           And the reference around the stacking the day  
12 shift and the night shift is to hold back the night shift  
13 officers, and then deploy the day shift officers so we have a  
14 larger amount, at that time, to be visibly present in the mid-  
15 morning to mid-afternoon when the bulk of those arriving  
16 demonstrators and activities, unlawful, assaultive type of  
17 activities, would be taking place.

18           The third point is around probably less of a  
19 public safety piece, but still unlawful, unsafe.

20           Funds that were enabling, to some significant  
21 degree, the ongoing activities here, and other locations, but  
22 certainly here in Ottawa.

23           Fuel. The trucks needed fuel and we were already  
24 trying to deal with the jerry cans and that, the open flames,  
25 propane in residential areas that I think has already been  
26 spoken about.

27           And the fun. Probably not the best word to use,  
28 but these were, I think, significant emotional and psychological

1 impacts on those that felt captured, abandoned, that elements of  
2 the demonstration and the convoy events were fun, where they  
3 were suffering. And I think there was a reasonable need for us  
4 to take whatever lawful and ethical actions we could to stop it  
5 or discourage it and negotiate it in some way, and those were  
6 largely the actions that PLT, I believe, we're involved with.

7 **MR. FRANK AU:** M'hm. Now, let me focus for the  
8 moment on the third -- well, the second and third point. The  
9 directive to close roads and so on, as well as shutting things  
10 down, like fuel seizure and so on.

11 In earlier testimony from Deputy Chief Ferguson,  
12 and I believe Deputy Bell as well, they expressed the view that  
13 this is an example of a strategic level executive going down,  
14 crossing the boundary into the Operational or even possibly  
15 technical level of Command, and there was some question about  
16 the propriety of a Strategic Level Commander doing that.

17 What's your view on this?

18 **MR. PETER SLOLY:** This is me crossing that  
19 boundary, and for a very specific reason. It's the first full  
20 week. The entire Service is fully deployed and fully exhausted.  
21 We are getting massive complaints from our community, and they  
22 are suffering. By this time, they are suffering. The  
23 resilience I talked about was still there in a lot of people,  
24 but it's waning.

25 We are now reasonably able to predict the cycles  
26 of increases on Friday, Saturday, into Sunday, and down. We  
27 know what's coming, and we knew what hit us the week before.  
28 And this is the Chief of Police calling a special Incident

1 Command meeting to say, "Are we ready? Do we have the capacity?  
2 Are we able to significantly alter what took place last Saturday  
3 to what is going to take place this Saturday? And I need to  
4 look around the room and eyeball everybody and get a nod or a  
5 headshake and then figure out what we need, you need for  
6 resources."

7 So I framed out something that people come  
8 prepared to discuss and invited them to that meeting.

9 **MR. FRANK AU:** Just so I understand, you're  
10 acknowledging that you were in fact stepping into the  
11 Operational/Tactical levels, but you are saying this is  
12 justified under the circumstances?

13 **MR. PETER SLOLY:** I was stepping into the  
14 Operational levels to make sure that strategic intent was really  
15 clear to the Operational Commanders.

16 **MR. FRANK AU:** Now, at this time, on the 5th, who  
17 was the Event Commander in charge?

18 **MR. PETER SLOLY:** Well, I thought it was  
19 Superintendent Chris Rheume. I found out at the meeting that  
20 transpired later that in fact it was Superintendent Jamie  
21 Dunlop.

22 **MR. FRANK AU:** So when you made these directives  
23 you weren't aware yet that it was Dunlop, Superintendent Dunlop?

24 **MR. PETER SLOLY:** That's correct, sir.

25 **MR. FRANK AU:** Now, some may say that the proper  
26 way to do this is not for the Strategic Commander to step into  
27 the Operational level, but to have a discussion with the  
28 Operational Commander and provide strategic direction, or if the

1 Strategic Commander did not have enough confidence in the  
2 Operational Commander, to replace that person, rather than to  
3 start directing Operations him or herself. What do you say to  
4 that?

5 **MR. PETER SLOLY:** If you scroll up to the top of  
6 this, please? So this is... What's the timestamp on this  
7 email? Sorry, I just can't see it.

8 **MR. FRANK AU:** I believe it's 11:33 on Saturday,  
9 February the 5th.

10 **MR. PETER SLOLY:** No, that doesn't make sense.

11 **MR. FRANK AU:** Oh, I'm told that this may be  
12 Greenwich Mean Time, and so -- is this six hours difference?

13 **MR. PETER SLOLY:** So I think this around ---

14 **MR. FRANK AU:** Five hours.

15 **MR. PETER SLOLY:** It's around five or six  
16 o'clock.

17 So to give you context, Confederation Park had  
18 become a significant site that we were conducting PLT  
19 negotiations. The issue of fuel coming into the downtown from  
20 Coventry Road was escalating. The level of complaints,  
21 legitimate, desperate complaints coming in from businesses and  
22 residents are escalating.

23 We had spent most of the Thursday and Friday  
24 trying to build towards the announcement on the Friday of the  
25 surge and force, contain. The statements "all options are on  
26 the table, we are putting all of our resources on the ground.  
27 You will see a visible, different amount -- visible -- a greater  
28 visibility of police officers engaged in a wider array of

1 activities, including enforcement, to address the substantive  
2 complaints and concerns affecting our community."

3           And I know I went way too fast there, so I'm  
4 going to take a breath and let people catch up.

5           Coming into the Saturday night, I woke up because  
6 I wasn't getting a whole lot of sleep those days. I woke up  
7 somewhere around three o'clock in the morning, could not get  
8 back to sleep. Checked the situation report that came from Duty  
9 Inspector Frank D'Aoust, and he laid out information that is  
10 contained in this email.

11           The Confederation Park, I'm not reading exactly,  
12 but the Confederation Park negotiations ended badly. The  
13 Indigenous Elders that had come in were treated badly. There  
14 was an attack on one of our sergeants at one of the sites.  
15 Other City workers were being attacked.

16           This, for me, was an alarming situational report  
17 in the middle of the night that no one else was likely reading,  
18 and I wouldn't have been reading until I had woken up with my  
19 alarm at five o'clock in the morning. But I read it.

20           So I got in the shower and I got into my car and  
21 I got down to the station, and I changed into my gear, and I  
22 looked around. We were thinly staffed. I understand why.  
23 There was not much to staff with, and we were thinly staffed.

24           And when I went down onto the, we call the Zero  
25 Level of our Headquarters, and asked the watch commanders there  
26 and the sergeants, "What's our staffing levels look like for  
27 9 o'clock, 10 o'clock, 11 o'clock when the bulk of the resource  
28 -- when the bulk of convoys are coming in?" The numbers I got

1 were really concerning. The level of threat from the  
2 situational report from Inspector D'Aoust at three o'clock in  
3 the morning was alarming.

4                   So overnight we had an escalated level of threat  
5 at multiple different sites, and in the morning, I wasn't  
6 getting a sense that we had the staffing commensurate to what we  
7 had announced and what we actually needed. And so I needed to  
8 make sure that I could pull together an Incident Command Team  
9 and ask these Operational level questions to be assured that we  
10 were in a better state of affairs than what I was getting at  
11 that point in the morning. And I think that is a reasonable  
12 level of situational awareness for a Chief of Police in an  
13 unprecedented crisis to ask of their Operational Commanders.

14                   **MR. FRANK AU:** Would you agree, then, that these  
15 priorities set out in this email were conceived by you and  
16 directed by you?

17                   **MR. PETER SLOLY:** They were conceived by me, they  
18 weren't directed by me. They were -- these were the areas that  
19 we were going to explore at the Commanders meeting.

20                   **MR. FRANK AU:** But then we also heard from Deputy  
21 Chief Ferguson, or what we confirm through her testimony the  
22 notes that she wrote, that you expressed the sentiment that this  
23 plan was not to be changed. "Not changing the Operational Plan,  
24 needed to implement the hell out of that plan for the next  
25 72 hours. The plan we have is excellent."

26                   So I believe we asked Deputy Chief Ferguson  
27 whether that was what you said, and she confirmed it. Do you  
28 remember?

1           **MR. PETER SLOLY:** At what point was that? Is  
2 that the subsequent meeting that we had when I called for the  
3 Incident Command meeting?

4           **MR. FRANK AU:** Perhaps it would help if we go  
5 back to OPS00014479. Those are Deputy Chief Ferguson's notes.  
6 If necessary, we can also go to her transcript from last  
7 Thursday's testimony.

8                         So if we go to page 43. Can we go down? We need  
9 to go back up a little. Sorry, go up. Further up:

10                                 "Need to turn the corner on this today.  
11                                 I am not changing the Op Plan. Need to  
12                                 implement the hell out of the plan for  
13                                 the next 72 hours."

14                         So does that refresh your memory?

15           **MR. PETER SLOLY:** Yes.

16           **MR. FRANK AU:** So you said that?

17           **MR. PETER SLOLY:** Yes.

18           **MR. FRANK AU:** And you consider this an excellent  
19 plan, and it was not to be changed?

20           **MR. PETER SLOLY:** Just -- I'm a little confused,  
21 sorry, sir.

22           **MR. FRANK AU:** Yes.

23           **MR. PETER SLOLY:** The three-pointer that I put in  
24 my email writing is not the Ops Plan I'm referring to here.

25           **MR. FRANK AU:** Ah. Could you clarify that?

26           **MR. PETER SLOLY:** Yes. I sent a meeting request.  
27 I'm concerned about these three areas. We're going to discuss  
28 them. We have this meeting, and I'm saying, "Our Ops Plan is

1 the right plan. What I want us to do is implement the hell out  
2 of it."

3                   So surge and force, contain was part of our Ops  
4 Plan. Implement the hell out of it. That means you're going to  
5 have to have enough resources to do that. To surge into the  
6 neighbourhood, you -- I think the number we said was, I might  
7 get the numbers wrong, but I think it was 30 per shift over 3  
8 shifts in two neighbourhoods, where you would see 15 extra  
9 uniform officers in those neighbourhoods. But if we can't staff  
10 to that level, we can't implement the heck of out it, or even  
11 implement it. So the staffing request is around make sure that  
12 what we've announced as part of our excellent Ops Plan, which is  
13 not changing, has the staffing to implement it. That's the  
14 reference.

15                   The reference around the Traffic Plan, we're  
16 supposed to be reducing the amount of convoys coming into the  
17 city. Make sure the Traffic Plan is staffed adequately and  
18 implemented effectively, so we don't have the same level of  
19 surge of trucks and vehicles coming into the downtown, but we're  
20 not changing the plan.

21                   There was a clarification, and there was a  
22 misunderstanding from Inspector Frank D'Aoust and I first  
23 contacted him at probably four o'clock in the morning, where he  
24 interpreted close everything as literally get the OPP to close  
25 every highway off ramp of the King's highways across the entire  
26 municipality of Ottawa. He would need probably a thousand  
27 police officers to do that, and I would never intend that to  
28 happen. I would never need that to happen. I never needed it



1 to happen. That misinterpretation has stayed alive to this day.  
2 I clarified in this meeting, down to off ramps that give direct  
3 access to the downtown core where our red zones area, that's  
4 what I need. I wanted all the interprovincial bridges closed  
5 because all of them give direct access to the downtown core, and  
6 I wanted to know that we had more roads closed internally than  
7 we had the weekend before, but I never publicly in the media,  
8 and I never in these meetings said get the OPP to close  
9 everything, everywhere, and keep it closed.

10 **MR. FRANK AU:** Right. That's helpful  
11 introduction to my next question because there was a public  
12 announcement the day before on the 4<sup>th</sup>; right? What's your best  
13 recollection as to what was said at that press event in terms of  
14 what was contemplated?

15 **MR. PETER SLOLY:** My best recollection was around  
16 the concept of all options are on the table. We are looking at  
17 greater levels of road closures including highway off ramps and  
18 interprovincial bridges.

19 **MR. FRANK AU:** But would you agree that the  
20 purpose of the meeting on the 5th was to establish the resources  
21 required in order to carry out these priorities?

22 **MR. PETER SLOLY:** Not at all, sir. I wanted to  
23 ensure that the resources that had been said that would be in  
24 place were actually going to be in place.

25 **MR. FRANK AU:** Right. So we could have  
26 misunderstood, but let's see if we could clarify this. If I  
27 could take you to your interview summary, WTS00000040 at page  
28 27. If we go down further?

1                   **MR. PETER SLOLY:** Actually, if you scroll up a  
2 little bit, sorry. Right there.

3 "On February 4<sup>th</sup>, Chief Sloly announced at a press conference  
4 that [the] OPS would be making greater use of road closures,  
5 including closures of off-ramps for Highway 417..."

6                   There's no statements there saying that we're  
7 going to close everything.

8                   **MR. FRANK AU:** No, no, no, that -- I agree with  
9 you on that, but that's the announcement, but I'm asking you  
10 about the purpose of the meeting on the 5<sup>th</sup>, the morning meeting.  
11 So if we go to this paragraph that says,

12                                 "Chief Sloly saw the situation report  
13                                 early on the morning of February 5[th].  
14                                 In response, he held several early  
15                                 morning meetings to ensure that OPS's  
16                                 surge and enforcement strategy and  
17                                 efforts to harden the downtown core  
18                                 were proceeding properly. He wanted to  
19                                 ensure that OPS had the staffing to  
20                                 implement what it had announced on  
21                                 February 4[th]. Specifically, he spent  
22                                 Inspector D'Aoust an email with a list  
23                                 of meeting topics and asked him to  
24                                 organize a meeting with the members of  
25                                 the IC..."

26                   I believe that's Incident Command?

27                                 "...and the command team."

28                   So and so it goes. So am I correct that on the

1 5<sup>th</sup> this meeting was arranged in part to ensure that the OPS had  
2 the staffing to implement what he had already announced the day  
3 before?

4 **MR. PETER SLOLY:** Yes, but the plan was already  
5 to have those staff in place. I wanted to make sure they were  
6 actually available. A lot can happen in 24 hours. Potentially,  
7 without me knowing, the Incident Commander could have developed  
8 a plan that was going to take resources away from those  
9 commitments. If they had said we can't staff your surge and  
10 enforcement because we've got all those neighbourhood officers  
11 doing something else, or we had a shooting in the west end last  
12 night and it's an extensive scene and we can't redeploy our  
13 traffic to that, then I would have understood. We couldn't  
14 staff what we planned. But we weren't trying to figure out just  
15 then if we had the staffing for what we had announced. That is  
16 not correct.

17 **MR. FRANK AU:** As a best practice, would it not  
18 be preferable to first ensure that OPS had the resources before  
19 announcing these plans publicly?

20 **MR. PETER SLOLY:** I was told we had the  
21 resources, sir.

22 **MR. FRANK AU:** All right. But do you agree with  
23 me that it would be -- it might be problematic to make  
24 announcements when it turns out that the resources are not  
25 there, or for other reasons the actions cannot be carried out,  
26 because it might contribute to a loss of public confidence?

27 **MR. PETER SLOLY:** If that was the case, and  
28 clearly, there was no understanding that the resources were

1 available and reasonably predictably going to be available, that  
2 would be problematic. That was not the case in this situation.

3 **MR. FRANK AU:** Okay. So we've covered the events  
4 on the 4<sup>th</sup> and on the 5<sup>th</sup>. Now the general priorities, and if we  
5 go back to the email on the 5<sup>th</sup>? We've looked at the general  
6 priorities. Mr. Clerk, do you need the document number?  
7 OPS0007355.

8 So I've already asked you, Chief Sloly, about the  
9 general priorities. I want to ask you now about the location  
10 priorities, which is further down. There we go. So there are  
11 four locations listed: Confederation Park, Rideau -- I take it  
12 that this refers to the intersection Rideau and Sussex?

13 **MR. PETER SLOLY:** I believe so, sir, yes.

14 **MR. FRANK AU:** Third is Wellington and then  
15 fourth is SJAM. Who set these priorities, the general and the  
16 location priorities?

17 **MR. PETER SLOLY:** So those were the locations  
18 where our red zone -- Rideau, Wellington and SJAM are the three  
19 basic footprints of the red zone. Those were established, I  
20 believe, through the Incident Commander up through Trish  
21 Ferguson. She was the first that I recall hearing about the red  
22 zone and the footprints were described to me in subsequent  
23 meetings from probably the Sunday through until now.  
24 Confederation Park, as I had advised, I think that started up  
25 somewhere around the Thursday. I might be mistaken, but  
26 Wednesday, Thursday, Friday, but certainly had escalated to a  
27 significant event for us to be managing on the Thursday night,  
28 Friday into the weekend. So those weren't my priorities. Those

1 were already priorities established by virtue of the briefings I  
2 was getting, the situation reports that were coming in to me.

3 **MR. FRANK AU:** Are you speaking now of just the  
4 location priorities or does that apply as well to the general  
5 priorities?

6 **MR. PETER SLOLY:** I'm sorry, what general  
7 priorities? I maybe ---

8 **MR. FRANK AU:** The previous list, if we just  
9 scroll up? It's three points.

10 **MR. PETER SLOLY:** Well, we were dealing with a  
11 demonstration, so that's literally the entire theory of  
12 operations, number two, surge contain and enforce was to address  
13 the trauma impacting our communities. And shutting down the  
14 ability for this thing to sustain itself, again, those are just  
15 priorities that we'd been working on literally since the  
16 previous weekend. Those aren't new priorities. That's  
17 essentially what we have been working on.

18 **MR. FRANK AU:** Well, I -- perhaps I'm not clear,  
19 but I -- my question is, who set these priorities -- or is your  
20 position that shutting down fuel funds and fund, these are  
21 priorities known to everyone?

22 **MR. PETER SLOLY:** Sorry, in terms of shutting  
23 down enabling factors, at a broad level, that was already well  
24 underway. We already had established I think through Deputy  
25 Bell and Christiane Huneault contacts with the City to try to  
26 shut down the GoFundMe. I may not be using the right  
27 terminology, but not allow those funds to continue to enable the  
28 ongoing occupation of the city. Diesel and propane and wood had

1 already been established through briefing cycles coming up to me  
2 as priorities that the Incident Commander and the team were  
3 working on, and there's lots of communication around that, and  
4 questions and public forums, so that was already well  
5 established. I would probably agree the fund piece was  
6 something that I had inserted in there, but clearly had become a  
7 significant problem and a public trust problem. And so that's  
8 probably the only newer element but already a well-established  
9 part of our briefing cycles that we had been discussing.

10 **MR. FRANK AU:** What about "Close everything"?

11 **MR. PETER SLOLY:** I've explained -- again, I've  
12 explained that, ---

13 **MR. FRANK AU:** With the -- with the ---

14 **MR. PETER SLOLY:** --- the context. That that was  
15 misinterpreted and then clarified in the meeting that happened  
16 subsequent.

17 **MR. FRANK AU:** But who set that priority; the  
18 direction to close roads, interprovincial bridges and so on?

19 **MR. PETER SLOLY:** The pre-planning document.

20 **MR. FRANK AU:** Then I don't -- what I don't  
21 understand is, I thought a moment earlier you said you did step  
22 -- you did cross from strategic level to operational level but  
23 for a good reason.

24 **MR. PETER SLOLY:** Yes, well -- then let me  
25 further explain. I'm not enforced -- I'm not introducing new  
26 priorities. I am asking; "These are the priorities that we've  
27 set. Are we able to implement them? We have a plan. Are we  
28 able to implement them? Do we have the resources? Are we ready

1 to go this morning?" Because we weren't ready to go the last  
2 morning. We did not have the ability to have the resources to  
3 address the level of surge coming into the city, and now we have  
4 additional priorities that we've identified over the week.

5 I wanted to make sure -- I'm not setting new  
6 priorities, I'm ensuring that we have the resources to actually  
7 fully implement, the vernacular, the heck out of the plan that  
8 we have in place; it's an excellent plan. Do we have the  
9 resources? Can we fully and effectively implement it? That's  
10 my mindset going into the meeting; that's why I've called that  
11 meeting.

12 **MR. FRANK AU:** Okay. So, just if I understand,  
13 your position is that whoever developed the plan, the plan that  
14 kept evolving, they decided the priorities. You didn't set  
15 anything new except for the third point, the fun part, and ---

16 **MR. PETER SLOLY:** Even that, sir, I would  
17 suggest, clearly, we were already aware of the issue of the  
18 bouncy castles and the DJs and the dancing and the fireworks.  
19 That was -- that's a very short list of all the things that were  
20 afflicting the neighbourhoods in and around the red zones.

21 Open barbeques; people blocking lanes, tearing  
22 masks off people's face. I could -- I could go down the list  
23 and detail the incredible range of assaultive-type behaviour.  
24 But the broad thing is shut down these enablers and let's not  
25 allow our city to look like it's a theme park in the middle of a  
26 public safety crisis.

27 I hadn't introduced anything more than articulate  
28 the obvious. And these were briefings that I was being given

1 for days in advance of me calling this meeting.

2           **MR. FRANK AU:** All right. And another point to  
3 clarify, because you told us earlier that this is not the plan,  
4 that this is not -- this email, these priorities are not the  
5 plan that you thought was excellent; there was another plan, the  
6 one that has evolved.

7           **MR. PETER SLOLY:** There's only one ---

8           **MR. FRANK AU:** I want to take you ---

9           **MR. PETER SLOLY:** There's only on plan, sir.

10           **MR. FRANK AU:** The one plan that kept evolving.  
11 I want to take you to a document and see if you can confirm that  
12 was the plan as of this time.

13                    Could we go to OPS00006941?

14                    So it says, "Freedom Convoy - Canada Unity -  
15 Phase 2 Operational Plan." There's a date that's partially cut  
16 off; February 4<sup>th</sup>, it looks like?

17                    If we scroll down to the Table of Contents,  
18 perhaps?

19                    Does this look familiar?

20           **MR. PETER SLOLY:** It's the basic template of our  
21 operational planning.

22           **MR. FRANK AU:** We go down further, maybe we can  
23 just scroll through so the former Chief can familiarize himself  
24 with this document.

25                    Let us know if you're ready to scroll down.

26           **MR. PETER SLOLY:** Yes, please do. Okay, thank  
27 you.

28           **MR. FRANK AU:** So would those priorities be



1 reflected -- well, assuming that this is the plan -- because  
2 this is this -- the cover says February the 4<sup>th</sup>, and we have the  
3 email saying February the 5<sup>th</sup>; it should be approximate in time?

4 **MR. PETER SLOLY:** Yes, sir.

5 **MR. FRANK AU:** So when you said, "We had an  
6 excellent plan"; could -- were you referring to this plan?

7 **MR. PETER SLOLY:** I don't know if I was referring  
8 to this plan. I don't know if I ---

9 **MR. FRANK AU:** Or another iteration very close  
10 ---

11 **MR. PETER SLOLY:** I don't know if I've ever  
12 received it, but at whatever point I was last briefed on our  
13 plan, that's the point of reference that I'm making on the  
14 Saturday the 5<sup>th</sup>.

15 **MR. FRANK AU:** Right. And should those  
16 priorities, general or location-wise, be reflected in this plan?

17 **MR. PETER SLOLY:** Again, unless there's sub-plans  
18 that have those priorities identified in there, I can't recall  
19 ever receiving or reading through this version of the plan.

20 **MR. FRANK AU:** But you had read a version of the  
21 plan that you called excellent?

22 **MR. PETER SLOLY:** I had been briefed on versions  
23 of plan. You'll recall I only got the pre -- I only got the  
24 pre-operational plan on the 28<sup>th</sup>; two days, technically, into  
25 what the event was. So I wasn't required to sign off on these  
26 plans. There's no signature block from me. I'm not approving  
27 plans. They're happening on a real-time basis, so I don't have  
28 a timestamp in my head that I saw a document at point zero and

1 said, "That's the excellent plan."

2           The briefing cycles that I had been getting, I  
3 have an understanding of what the priorities are, how they're  
4 being resourced, how they're being -- going to be actioned, what  
5 requests for resourcing is coming to me. But that's based on a  
6 briefing cycle, not me sitting and flipping through pages of a  
7 plan saying, "Wow, this is excellent; this is the one we have to  
8 implement."

9           **MR. FRANK AU:** So just to be clear, the initial  
10 plan, the one dated January 28<sup>th</sup>, that one you did read?

11           **MR. PETER SLOLY:** Yes, it was delivered to me the  
12 morning of the 28<sup>th</sup>.

13           **MR. FRANK AU:** And any subsequent evolvment of  
14 that plan, you learn about those developments through briefings  
15 but not through your reading them?

16           **MR. PETER SLOLY:** With the exception of the  
17 February 9<sup>th</sup> version.

18           **MR. FRANK AU:** Right. So as of the 5<sup>th</sup>, when you  
19 describe an excellent plan, is an excellent plan that you  
20 haven't read?

21           **MR. PETER SLOLY:** It's an excellent plan based on  
22 the briefings. I can't recall whether or not this was sent to  
23 me.

24           **MR. FRANK AU:** Okay. So if we move on to the  
25 next topic, which is something that you've alluded to; the Event  
26 Commander's -- there was some switching of Commanders, and at  
27 the beginning of the events you weren't always apprised of those  
28 changes in a timely manner. So I'd like to ask you about that.

1 Let me find the page reference; OPS00004771.

2 (SHORT PAUSE)

3 **MR. FRANK AU:** So you see that this is dated  
4 January the 30<sup>th</sup>. It's an email from you to Deputy Chief  
5 Ferguson, Deputy Chief Bell; who's John Steinbach?

6 **MR. PETER SLOLY:** He's the executive -- was at  
7 that point the Executive Director of Communications and  
8 Strategy.

9 **MR. FRANK AU:** And then it was also sent to Russ  
10 Lucas and Chris Rheaume. So I assume that that was because  
11 Supt. Rheaume was the Event Commander at the time?

12 **MR. PETER SLOLY:** That's my understanding, sir.

13 **MR. FRANK AU:** Now according to Supt. Rheaume's  
14 notes, he was removed as the Event Commander on or around  
15 February the 1<sup>st</sup> because Trish Ferguson, the Deputy Chief  
16 Ferguson received direction from you to remove him; is that  
17 correct?

18 **MR. PETER SLOLY:** No, it's absolutely false.

19 **MR. FRANK AU:** Right. So that's what I wanted to  
20 clarify because we actually heard from Deputy Chief Ferguson  
21 that he was removed for other reasons. But we do have these  
22 notations in Supt. Rheaume's notes, that's what I want to bring  
23 those to your attention.

24 If we could go to document ---

25 **MR. PETER SLOLY:** I was told by Acting Deputy  
26 Chief Ferguson that the switch for Dunlop was because -- my  
27 recollection was because Insp. Lucas needed some time off; he  
28 was tired. I may have misinterpreted that, maybe it was Chris

1 Rheume. But that's my understanding, that there was a  
2 temporary switch to give somebody days off to go and sleep,  
3 basically.

4 **MR. FRANK AU:** M'hm.

5 **MR. FRANK AU:** But I gave no direction whatsoever  
6 at any time for Supt. Rheume to be removed from his role as  
7 Event Commander.

8 **MR. FRANK AU:** Okay. But we do have notes from  
9 Supt. Rheume. So first I want to take you to two sets of  
10 notes.

11 **MR. PETER SLOLY:** Can I see those notes, sir?

12 **MR. FRANK AU:** Yes. That's where I'm taking you  
13 to.

14 So OPS00014537. I believe it's page 5.

15 So 19:30 ---

16 **MR. PETER SLOLY:** Which day would that be? Is it  
17 the 1<sup>st</sup> or the 2<sup>nd</sup>?

18 **MR. FRANK AU:** It would be the 1<sup>st</sup>, I believe,  
19 because the next -- the date after the line is February the 2<sup>nd</sup>.  
20 We can go back and check. The date might have been on the first  
21 page, actually.

22 So can we go back to the first page to establish  
23 the date, or the second page, I guess. Oh, no. Okay, so keep  
24 going down.

25 Okay, so this is page 2 of 7, it's February 1st.

26 Now we scroll down. That's right. It's the next  
27 page:

28 "I was informed by [Deputy Chief] Trish

1 Ferguson to report to duty tomorrow at  
2 Greenbank and to take care of my teams.  
3 No reason why I was removed from NCRCC  
4 and that I am no longer the Event  
5 Commander."

6 So the notation on this date suggests that he was  
7 removed and he didn't understand why.

8 Now, if we go to page 6. Go down a bit.

9 Okay, so now we have his notes on February the  
10 10th, and the notation says:

11 "Advised by [Acting Deputy  
12 Chief] Ferguson that Chief Sloly had me  
13 removed by her on Feb 1."

14 So it appears from these notes that he was  
15 removed on the 1st, not told why, and then there is a notation  
16 on the 10th that -- giving him the reason, that he was in fact  
17 removed by her -- well, through her by you.

18 So I just wanted to get your position on what  
19 happened.

20 **MR. PETER SLOLY:** Absolutely false. Never ---

21 **MR. FRANK AU:** Okay.

22 **MR. PETER SLOLY:** Never gave that direction.

23 **MR. FRANK AU:** So in fact, you were not aware  
24 that he was removed?

25 **MR. PETER SLOLY:** I was -- again, I understood  
26 from my recollection, and I don't know if there's notes to  
27 support, my recollection is hearing that Inspector Lucas was  
28 very tired. He had been -- gone through the entire planning

1 cycle and had survived through that first weekend, and he had  
2 requested time off, and it was for him that  
3 Superintendent Dunlop was replacing. I don't recall a reference  
4 to Superintendent Rheaume. I have not recollection whatsoever  
5 of any conversation in which it was suggested to me or I  
6 directed that Superintendent Rheaume be removed as the Event  
7 Commander.

8 **MR. FRANK AU:** Right.

9 **MR. PETER SLOLY:** Zero.

10 **MR. FRANK AU:** Okay.

11 Now, if we could go back to ---

12 **MR. PETER SLOLY:** And it's very concerning that  
13 it's articulated in that way.

14 **MR. FRANK AU:** Well, that's why I want to bring  
15 these to your attention so you have a chance to respond.

16 OPS00014484. And if we can go to page 10,  
17 please.

18 So these are notes to yourself again? Yes?

19 **MR. PETER SLOLY:** Yes, sir.

20 **MR. FRANK AU:** It's dated February the 5th.

21 Title is Meet With Acting Deputy Chief Ferguson and DC Bell:

22 "I advised that I had only just  
23 officially heard that Supt Dunlop had  
24 replaced Insp Lucas as the Incident  
25 Commander at the previous briefing."

26 So you just learned on the 5th that Dunlop is now  
27 the Commander, and ---

28 **MR. PETER SLOLY:** Well -- sorry. Again, here is

1 the confusion for me, because either in that meeting or before,  
2 Ferguson, sorry, Acting Deputy Chief Ferguson said "Lucas needed  
3 time off. We brought Dunlop in." So that's why I'm referring  
4 to Lucas, not Rheaume here. In my mind, my notes,  
5 contemporaneous notes are "Lucas got replaced. Why? Why didn't  
6 you tell me?" I had no idea about the Rheaume piece. I had no  
7 idea about why he was removed, I had no idea he was removed. My  
8 only context was Lucas was removed, and that was surprising for  
9 me.

10 **MR. FRANK AU:** Yes. I'm not challenging your  
11 version, I'm just trying to understand from your perspective  
12 just what happened because it was pretty confusing when we're  
13 trying to go through the record, as you can imagine.

14 The next paragraph:

15 "DC Bell advised that he was the new  
16 Incident Commander installed this  
17 week..."

18 Referring to Dunlop:

19 "...and was leading the implementation  
20 of the preferred POU option. I asked  
21 why I was not advised of the change in  
22 the Incident Commander from Insp Lucas  
23 to Supt Dunlop. [Acting Deputy  
24 Chief] Ferguson took ownership of that  
25 failure to communicate and DC Bell  
26 admitted it was based on his  
27 recommendation. I counselled [Acting  
28 Deputy Chief] Ferguson that she was

1 accountable for all Incident Command  
2 decisions so I hold responsible for  
3 this change and for not advising me of  
4 the change. I counselled that DC Bell  
5 that he is to stop interfering in  
6 [Acting Deputy Chief] Ferguson's role  
7 as Major Incident Commander. I  
8 counselled both that such major changes  
9 in the leadership of the [Incident  
10 Command] was to come to me for final  
11 approval outside of Operational  
12 exigencies. I advised both that I did  
13 not have confidence in Supt Dunlop as  
14 the Incident Commander based on his  
15 performance in the Panda Game..."

16 And so on.

17 So I just want to clarify a number of things.  
18 First, when Superintendent Rheume, as the Event Commander, was  
19 replaced by Jamie Dunlop on or around the 1st of February, you  
20 had no knowledge of that until on or around the 5th?

21 **MR. PETER SLOLY:** Even on the 5th I don't think I  
22 realised what had happened to Rheume.

23 **MR. FRANK AU:** Right. But you did not understand  
24 that the Event Commander is now Dunlop, you did not know that  
25 until the 5th?

26 **MR. PETER SLOLY:** Yes, sir.

27 **MR. FRANK AU:** And that was concerning for you?

28 **MR. PETER SLOLY:** Extremely.



1           **MR. FRANK AU:** You addressed the situation with  
2 both Ferguson and Bell, and that is because as the Chief  
3 Executive you needed to know?

4           **MR. PETER SLOLY:** I needed to know who was  
5 running our Operations.

6           **MR. FRANK AU:** So what effect, if any, did that  
7 incident have on your trust of your team, your Command Team?

8           **MR. PETER SLOLY:** It was a massive trust hit.

9           **MR. FRANK AU:** Tell us about that.

10          **MR. PETER SLOLY:** I think it's pretty clear,  
11 honestly. We're in the middle of what is now I consider a  
12 national security crisis, my opinion, it doesn't have to be held  
13 by others; certainly a local public safety crisis; and one, if  
14 not the most important functions is the Incident Commander. The  
15 Major Incident Commander, Event Commander, Incident Commander,  
16 that is my entire understanding of leadership capability and  
17 capacity to orchestrate all of what needs to be done across the  
18 Incident Command System just so that we can continue to provide  
19 adequate effective policing.

20                 That is a major level change, and one that was  
21 made without any consultation, any communication to me, and one  
22 that appeared to have been kept secret from me until literally  
23 it came up in the briefing meeting that I had called. I don't  
24 even know if to this day that I didn't call that briefing  
25 meeting that I wouldn't have known about it until the Sunday,  
26 the Monday or the Tuesday.

27                 What's also materially important here...

28                 If you scroll back up, please. Right there.

1 "I asked why I was not advised" -- sorry:

2 "...he was the new Incident Commander  
3 installed this week and was leading the  
4 implementation..."

5 This is Dunlop:

6 "...was leading the implementation of  
7 the preferred POU [plan]."

8 Superintendent Dunlop was not at the February 1st  
9 meeting in Kanata, that two hour plus meeting, where we had that  
10 discussion around "where are we now, and how can we get out of  
11 this?" He was not a part of the discussion of the Public Order  
12 Unit Commanders who were expert in that area. How could he have  
13 been replaced to lead this if he wasn't part of that essential  
14 meeting?

15 I left explicit instructions, and it was in the  
16 notes that you showed earlier, "If you need anything more from  
17 me, if you need to clarify, I'm available to you." This is  
18 clearly one of the most important things that I've asked Trish  
19 Ferguson and her Incident Command Team, who were there  
20 represented as fully as they could be, Lucas couldn't attend,  
21 you recall, for whatever reason, "This is critical. I need a  
22 set of options in three days before the weekend events come."  
23 And somehow in that timeframe, without me understanding or even  
24 knowing, a switch of that magnitude was made and then put in  
25 charge of the planning for that that I was expecting a briefing  
26 on.

27 I finally got a briefing later in the afternoon  
28 on the 5th of those three options. Could it have meant I

1 could've had a briefing on the Wednesday or the Thursday,  
2 possibly, and could that have meant that we could have started  
3 two days, three days, four days earlier to actualise that scale  
4 of Operations, including making the request for the Public Order  
5 Commanders on scale that I was told on the February 1st meeting?

6 We lost time, and clearly there was a lot of  
7 confusion. Even this note demonstrates I'm still not quite sure  
8 who's running what.

9 And for Chief of Police, with the citizens and  
10 trauma and victimisation that they were under, our own members  
11 as struggling as they were, at best I can call this a  
12 significant lack of judgement on behalf of my two Operational  
13 deputies. At worst, probably this would've been a review that I  
14 would have done after the events had concluded and looked at it  
15 even more closely.

16 **MR. FRANK AU:** Did your level of trust in your  
17 two Deputies change from that point on?

18 **MR. PETER SLOLY:** Yes.

19 **MR. FRANK AU:** Did they regain your trust  
20 afterwards?

21 **MR. PETER SLOLY:** Significantly. But at that  
22 point, it was low.

23 **MR. FRANK AU:** And to support some of the other  
24 things that you've said, can we go to OPS00014479?

25 **MR. PAUL CHAMP:** While that document's being  
26 pulled up, Commissioner, I would just note -- it's Paul Champ,  
27 for the record.

28 Just taking a look at the testimony of Deputy

1 Chief Ferguson, it wasn't put to her by any witness (sic) about  
2 whether she had been directed by former Chief Soly to remove  
3 Superintendent Rheaume from that position, so I'm just -- just  
4 noting for the record that that -- we don't have any other  
5 evidence on that in the background.

6 Thank you.

7 **MR. FRANK AU:** I believe my friend is correct. I  
8 think she simply said the reason she believed that he was  
9 removed but she wasn't given this document.

10 **MR. PAUL CHAMP:** Yeah, I'll just look at the  
11 transcripts and confirm that.

12 Thank you.

13 **MR. FRANK AU:** So if we can go to page 67.

14 You see the notation, "The Chief began by saying  
15 we floundered last week and because we switched riders partway"  
16 -- I can't read the next word.

17 **MR. PETER SLOLY:** "Through", I believe.

18 **MR. FRANK AU:** Right. Through -- perhaps you're  
19 better at reading this. Can you help me out?

20 **MR. PETER SLOLY:** I don't know if I'm better,  
21 sir. But what I can read here:

22 "The Chief began by saying we floundered  
23 last week and because we switched -- we  
24 had switched riders partway through  
25 [something] the switch between Rheaume  
26 and Dunlop..."

27 **MR. FRANK AU:** Indicating.

28 **MR. PETER SLOLY:**

1                    "...indicating the switch between  
2                    Rheaume to Dunlop to Patterson. The  
3                    Chief and the team will not change any  
4                    of the players until the operation is  
5                    over unless Bill gets hit with a truck."

6                    I don't know what that means.

7                    **MR. FRANK AU:** Well, that comment was supposed to  
8 be attributed to you.

9                    **MR. PETER SLOLY:** I never used that term in my  
10 life, so I don't know what that means, "Bill gets hit". Who's  
11 Bill?

12                    **MR. FRANK AU:** But apart from that phrase on the  
13 last line, do you agree that this was the message communicated  
14 on this day, which I believe is February the 9th?

15                    **MR. PETER SLOLY:** These are her interpretations  
16 of what was communicated, so I don't agree with ---

17                    **MR. FRANK AU:** No, no, no. But I'm asking for  
18 your recollection if anything was said of that nature on  
19 February the 9th.

20                    **MR. PETER SLOLY:** So of that nature, we will not  
21 be changing out any of the major incident command positions  
22 unless there's exigent circumstances. If it's 3 o'clock in the  
23 morning and someone got hit by a truck and you got to switch,  
24 switch. Tell me in the morning at the first early opportunity  
25 or call me because I had a standing position that any major  
26 issue, I could be woken up out of bed for a phone call.  
27 Operational, officer safety issue or a major issue like this,  
28 you can call me, and they all knew that.

1                   So -- but other than that, the team we have, the  
2 plan we have, implement the heck out of it.

3                   **MR. FRANK AU:** Right. You expressed the view  
4 that things were delayed because of this unfortunate  
5 miscommunication or, for whatever reason, the lack of  
6 communication of the change to you or to seek your approval  
7 first.

8                   **MR. PETER SLOLY:** No. No. To be clear, things  
9 were delayed, things were confused. There was a churn of three  
10 Incident Commanders within a way too short period of time.

11                   Yes, some of that might have resulted in delays.  
12 I can't tell you specifically. It felt to me that the POU plan  
13 was delayed because of Dunlop's insertion and his need to get up  
14 to speed and his then reinterpretation of things.

15                   That's about the only thing I can point to that  
16 was materially delayed. I don't know if there's any other  
17 material delays. But the confusion was clear.

18                   This is also around the same time, I believe,  
19 that we're starting to get some concerns that are articulated  
20 from the OPP that there's confusion with the Incident Command  
21 Team.

22                   I recall a phone call from Commissioner Carrique  
23 in this period where he was saying, "My folks are saying there  
24 seems to be some confusion with your Incident Command Team".

25                   I took that to mean what was happening in this  
26 circumstance, and that's why, on February 9th, when the  
27 Integrated Command Team -- sorry, Integrated Planning Team was  
28 coming in for their briefing that we weren't going to do this to

1 ourselves again.

2 **MR. FRANK AU:** So do you remember saying  
3 something about floundering the week before because of a switch  
4 in Commanders?

5 **MR. PETER SLOLY:** I might have used a term like  
6 that, yes.

7 **MR. FRANK AU:** Okay. That's helpful.  
8 And you talk also about the discussions around --

9 -

10 **MR. PETER SLOLY:** Not across the board. That's  
11 not a pejorative. We were floundering around the incident  
12 command switch-outs.

13 **MR. FRANK AU:** Right. Precisely.

14 And you mentioned PLT was discussed around this  
15 time, too.

16 Let me take you to where I want to go. I want to  
17 talk to you about the use of PLT. In fact, I think we may be  
18 going back in time because this is -- these notes were made on  
19 the 8th or 9th, and this is a discussion about the week before,  
20 whether things were delayed the week before. So I'm going back  
21 to the week before.

22 We've all heard about the Coventry incident. I  
23 believe you know what I'm referring to.

24 **MR. PETER SLOLY:** I believe I do, but I'll let  
25 you carry on.

26 **MR. FRANK AU:** Right. So specifically, the PLT  
27 was involved with some successes and challenges during the first  
28 week. Do you agree?

1                   So for example, we've heard about Coventry.  
2 We've also heard Confederation Park. And would you consider the  
3 PLT's involvement at the Confederation Park -- the clearing of  
4 the Confederation Park to be a success?

5                   **MR. PETER SLOLY:** One they significantly  
6 contributed to, yes.

7                   **MR. FRANK AU:** So I want to get your perspective  
8 on the role of the PLT within the operational system because  
9 we've heard from different witnesses about these diverging  
10 approaches, emphasis being put on enforcement as opposed to  
11 engagement, so to speak. And we've heard evidence that you and  
12 perhaps Mark Patterson, Superintendent Patterson, at the time  
13 during that week of what one witness has described as *ad hoc*  
14 enforcement periods, that the two of you were favouring more  
15 enforcement in contrast to Deputies Ferguson and Bell, who were  
16 more in favour of PLT.

17                   I'm sorry. That's a long preamble, but do you  
18 get what I was trying to ---

19                   **MR. PETER SLOLY:** I understand that there's been  
20 a theme around that. I completely ---

21                   **MR. FRANK AU:** Perhaps you can explain that  
22 better.

23                   **MR. PETER SLOLY:** --- disagree with it.

24                   From my earliest days as a -- in training as a  
25 Public Order Unit Commander and in all of my times as a Public  
26 Order Incident Commander, Incident Commander, Major Incident  
27 Commander, Duty Operations Commander, the use of engagement --  
28 community engagement pre, during, all the way through, even in



1 the restoration phase has been something I was trained to and  
2 did in both police services that I had the honour to be part of,  
3 Toronto Police Service and the Ottawa Police Service.

4           While the PLT program expanded from an RCMP-OPP  
5 kind of technique to broader -- to other police services, I --  
6 for that most part, I was out of policing at that time. I had  
7 left the Toronto Police Service and was a partner at Deloitte.

8           I came back into the Ottawa Police Service and  
9 the term Police Liaison Team was a new term to me, but their  
10 function was not new at all to me. I had deployed such tactics,  
11 seen them work effectively and less effectively, and fail, but  
12 always had that approach.

13           Come back out of Incident Command -- and I know  
14 I'm going too fast.

15           Come back out of Incident Command, the concept of  
16 community engagement is something that I had been championing  
17 for and had done at multiple levels for multiple decades. There  
18 isn't anyone on God's green earth that would have to convince me  
19 of the necessity and the value of community engagement, trust  
20 building, negotiation, mediation, de-escalation in any aspect of  
21 policing, not the least of which in Incident Command, Critical  
22 Incident Command.

23           I have never in my entire life as a police  
24 officer, certainly as I became a senior officer and an executive  
25 and Chief of Police, have advocated for more enforcement over  
26 anything else. My record in the public is exhaustive on that.

27           The operational plans I led in the Toronto Police  
28 Service when I had 4,000 officers under my control, responsible

1 for anti-gang activities, always had a significant element of  
2 mediation, negotiation and engagement.

3 I built the Toronto Police neighbourhood policing  
4 strategy, and brought that here to Ottawa.

5 So this concept of Peter Soly as being some sort  
6 of ultra-enforcement-driven focused leader is a narrative that  
7 someone has constructed to attack my character, but bears no  
8 resemblance whatsoever to my actual record in policing,  
9 including my time as Chief of Police here in Ottawa, including  
10 the three weeks that I was in charge at the Ottawa Police  
11 Service during these events.

12 **MR. FRANK AU:** Is it fair to say then that the  
13 view attributed to you as less inclined to allow the PLT team to  
14 do its work and to prefer quick win, as one witness has  
15 described it, by enforcement methods, that is inaccurate?

16 **MR. PETER SLOLY:** I did talk about quick wins, as  
17 I do literally in every major operation or administrative  
18 project. You need quick wins. I think such is basically  
19 standard around to do something different, you need to prove you  
20 can do it different, and it builds morale and confidence. In  
21 that concept, quick wins was my contribution to that, and I  
22 didn't get any sense that there was a wrong or a misunderstood  
23 contribution.

24 What unfortunately has happened is that has been  
25 tied by someone or some people for some reason unknown to me to  
26 mean that PLT could not or should not be used, or could not and  
27 should not be used properly, or worse, that somehow I had to  
28 approve every single PLT action, otherwise it could not occur.

1 And that is a complete fabrication and a lie.

2 **MR. FRANK AU:** And just to clarify your attitude  
3 on the role of the PLT, so let's go to the next document and see  
4 if you can enlighten us.

5 OPS0004568. Now, just to give you the context, I  
6 believe these are the notes of S/Sgt. Ferguson. Not Deputy  
7 Chief Ferguson. S/Sgt. Ferguson, who was the lead of the PLT  
8 team at the OPS.

9 **MR. PETER SLOLY:** Sorry, just for correction,  
10 John was brought in partway through the events to provide  
11 additional supports and leadership to the PLT, but that wasn't a  
12 function he had before.

13 **MR. FRANK AU:** Right.

14 **MR. PETER SLOLY:** That's a decision that I was  
15 aware of and fully supported.

16 **MR. FRANK AU:** Yes.

17 **THE CLERK:** For counsel, is that OPS00014568?

18 **MR. FRANK AU:** Yes. And if we can go to page 15,  
19 please? Can we enlarge?

20 So I believe the date is February 5<sup>th</sup>, but we can  
21 confirm if we need to.

22 So do you see, Chief Sloly, here the notation  
23 that says:

24 "CONTINUE TO NEGOTIATE  
25 PLT DOING A GREAT JOB  
26 NEED MORE OF THEM TRAINED"

27 So maybe we should scroll up just to give the  
28 witness some context.

1           **MR. PETER SLOLY:** This is February 5<sup>th</sup>?

2           **MR. FRANK AU:** We can scroll further up.

3           **MR. PETER SLOLY:** Yeah, thank you.

4           **MR. FRANK AU:** So it's February 5<sup>th</sup>. So it says:

5                   "CONFERENCE CALL

6                   CRITICAL INCIDENT COMMAND"

7                   Go further down. Go down. I thought there was a  
8 reference to chief briefing.

9           **COMMISSIONER ROULEAU:** A reference to what?

10          **MR. FRANK AU:** That it was the Chief ---

11          **COMMISSIONER ROULEAU:** Well it's further up.

12 There's a reference to ---

13          **MR. FRANK AU:** Oh, okay. So I just missed it.

14          **COMMISSIONER ROULEAU:** --- Chief, I saw.

15          **MR. FRANK AU:** So, Chief Sloly, do you remember  
16 congratulating or encouraging the team?

17          **MR. PETER SLOLY:** I don't have ---

18          **MR. FRANK AU:** If they were doing a good job?

19          **MR. PETER SLOLY:** Sorry to interrupt. I don't  
20 have a specific recollection, but on literally a daily basis  
21 that would have been a comment that came from me. So I'm glad  
22 it was captured by John Ferguson. I'm glad I said that, because  
23 they probably deserved it based on the success of Confederation  
24 Park. I don't have an explicit ---

25          **MR. FRANK AU:** Right.

26          **MR. PETER SLOLY:** --- recollection.

27          **MR. FRANK AU:** But there are other occasions when  
28 we see notations in other people's notes, not with regard to

1 this incident, but PLT or negotiation more generally when the  
2 comments are a little more ambiguous. So I want to get your  
3 help in illuminating that.

4 I want to take you to another document,  
5 OPS00014454. If we go to page 55? So we're now on February 5<sup>th</sup>.  
6 If we go down? H'm. Can we go back up, please? It appears I  
7 may have the wrong reference. A moment's indulgence.

8 Okay. I don't want to waste anyone's time.  
9 Let's move on to another document. Can we go to page 32 of the  
10 same document?

11 So here, there's a notation, "What is our  
12 trajectory?" And then there are two branches: "enforced..."  
13 "enforced end" or "negotiated occupation end". "Need to [take]  
14 a decision today."

15 February the 3<sup>rd</sup>, ---

16 **MR. PETER SLOLY:** Sorry, whose notes would these  
17 be?

18 **MR. FRANK AU:** I believe these are notes taken by  
19 the legal services.

20 **MR. PETER SLOLY:** Okay.

21 **MR. FRANK AU:** So ---

22 **MR. PETER SLOLY:** February 3<sup>rd</sup>. And sorry, what  
23 time or what's ---

24 **MR. FRANK AU:** I'm not sure we have the time. We  
25 just have the date, which is February 3<sup>rd</sup>.

26 If you want to scroll up, we can see if we can  
27 find out more, but that's redacted, so that's not helpful.

28 So we're left with these notes. It may be that

1 you cannot help us with more information, but I thought I'd try.

2 Do you recall anything discussed along these  
3 lines on the 3<sup>rd</sup>?

4 **MR. PETER SLOLY:** I don't know how many meetings  
5 I would have had on the 3<sup>rd</sup>. Do you have a sense of what -- is  
6 this a morning meeting? Is this an afternoon meeting?

7 **MR. FRANK AU:** Unfortunately, the context, we  
8 don't have much to guide us on these pages.

9 So I'll just leave this and move on to the  
10 Coventry incident.

11 Oh, so I have a new note. Let's try page 59.  
12 Same document, page 59. If we go to the bottom, please? Right.  
13 Here.

14 So here there's a notation. This is again on  
15 February the 5<sup>th</sup>. The notation that says:

16 "Negotiation gives us legitimacy to use  
17 force if negotiation fails." (As read)

18 I take N-E-G to refer to negotiation. You can --  
19 -

20 **MR. PETER SLOLY:** It's not my handwriting, so.

21 **MR. FRANK AU:** No, these are the ---

22 **MR. PETER SLOLY:** I would assume so, yes.

23 **MR. FRANK AU:** --- notes from the legal services.  
24 But "PS", I take it, refers to your initials?

25 **MR. PETER SLOLY:** Yes, sir.

26 **MR. FRANK AU:** Do you recall any discussions  
27 around the use of negotiation as a way to give the police  
28 legitimacy to use force should it fail?

1           **MR. PETER SLOLY:** Well somebody's interpretation.  
2 In every aspect of policing, a measured approach is the  
3 preferred approach. From our use of force continuum through to  
4 incident command, communication, negotiation, de-escalation,  
5 risk mitigation is the preferred route. And if you can't  
6 demonstrate you did it, even for a second, even if you had a  
7 second of opportunity, if you can't demonstrate that you  
8 attempted to do that, then you have less legitimacy around your  
9 decision to use force. That would be the context in which I'm  
10 talking about it.

11           What I am not saying here, to be clear, is let's  
12 just pretend to negotiate while we put on the armour and go in  
13 there and hurt people. I would never say that.

14           **MR. FRANK AU:** And if anyone suggests otherwise,  
15 they would have misunderstood your view on the matter?

16           **MR. PETER SLOLY:** It would be really hard to  
17 understand how they could misunderstand that, but that would be  
18 the most charitable thing I could say.

19           **MR. FRANK AU:** Now, we spoke earlier about the  
20 success at the confederation Park, the involvement of the PLT.

21           Now we -- I want to take you to the event  
22 involving Coventry. That is -- that didn't go so well; did it,  
23 for the PLT?

24           **MR. PETER SLOLY:** Well, thank you for that  
25 clarification. From my limited understanding of it, there was a  
26 lot of moving parts there.

27           **MR. FRANK AU:** M'hm.

28           **MR. PETER SLOLY:** In the net -- I'm still not

1 sure whether as a whole it advanced our operations. It  
2 certainly caused, again, confusion and contention among key  
3 elements of it and demonstrated that we were not at the level of  
4 maturity and optimal alignment around these things, but some  
5 good things did occur as well.

6 **MR. FRANK AU:** What good thing occurred in your  
7 view?

8 **MR. PETER SLOLY:** This was part of the change to  
9 the transition from the preplan into a new phase of involving  
10 more attempts to stop fuel coming into the location. We had  
11 just, I think that week, had the success of at least temporarily  
12 ending the GoFundMe piece. We were starting to see some effect  
13 from the efforts of addressing unlawful and unruly behaviour in  
14 our neighbourhoods. We were starting to get a sense of what the  
15 priorities are. We had the Confederation Park win. I would  
16 call that a full win, largely through PLT, which I've talked  
17 about. So we were starting to show that we could aim at a  
18 priority, at a problem, at an objective and get a material  
19 result out of it, not just be paralyzed into complete, reactive,  
20 immobilized periods of time, which we had suffered in the first  
21 72 hours. So for me, this was a sign that we were starting to  
22 get somewhere towards the front foot, rather than being  
23 completely on the back foot. So while I would completely agree  
24 it was a challenge for the PLT, and a substantive one, and I  
25 won't in any way change the commentary that others have brought  
26 to it, but to suggest that it was a complete failure, I can't  
27 agree to that.

28 **MR. FRANK AU:** As I understand it, the issue was



1 not so much whether it was legitimate to seize fuel or to  
2 prevent people from taking fuel downtown, as Superintendent  
3 Beaudin explained, that wasn't the issue. The issue was for the  
4 PLT team to tell the protesters that something's okay, that --  
5 but then to turn around and arrest people when they take the  
6 fuel away. That's the problem that's leading to mistrust  
7 between the PLT and the protesters; do you agree?

8 **MR. PETER SLOLY:** And I don't want to be obtuse  
9 on this. That level of detail I was never aware of. After the  
10 fact, why didn't that happen? The morning I am briefed on it  
11 didn't happen. I have no idea if it happened or didn't happen.  
12 I think one of my complaints is I actually didn't get a call the  
13 night before to say it wasn't going to happen. So I don't know  
14 what was said by what PLT member, to who, what promise was made,  
15 I have no level of understanding even to this day what the PLT  
16 log notes say that they told them versus what happened. I've  
17 heard repeated descriptions of what took place, and even to this  
18 day, I'm still quite -- not quite sure what the sequence of  
19 events was. Clearly though, I am aware that there was a  
20 significant departure from the optimal way that PLT should be  
21 utilized, and it had a major impact on the PLT's abilities to  
22 move forward. That I am aware of and I'm confident enough in  
23 that evaluation. And that's why you will see, even more after  
24 this point, I am requesting additional PLT expertise from  
25 Commissioner Carrique. I'm reinforcing PLT and the need for it  
26 to be properly utilized, literally at every meeting that happens  
27 after this.

28 **MR. FRANK AU:** Just so we are on the same page,

1 it may be helpful if I take you to the interview summary of  
2 Staff Sergeant Ferguson. If we can go to WTS00000027, please,  
3 at page 8.

4 So he provided a description of what happened  
5 that day. I'd like to read that to you and then get your  
6 thoughts on it. So,

7 "At 4:40 p.m. on February the 6[th],  
8 Superintendent Patterson advised Staff  
9 Sergeant Ferguson that POU was going to  
10 Coventry Road and would be seizing fuel  
11 for evidentiary purposes. At that  
12 time, PLT had been at Coventry Road for  
13 at least two hours, engaging with  
14 protesters. Staff Sergeant Ferguson  
15 informed Superintendent Patterson that  
16 PLT was negotiating with the protesters  
17 and that they were compliant, but  
18 Superintendent Patterson indicated that  
19 he intended to proceed with the public  
20 order operation.

21 Staff Sergeant Ferguson attempted  
22 unsuccessfully to convince others in  
23 OPS not to proceed with the public  
24 order operation at Coventry Road. At  
25 5:00 p.m., Inspector Marin reiterated  
26 Superintendent Patterson's direction to  
27 Staff Sergeant Ferguson that they did  
28 not want the fuel from Coventry Road to

1 be displaced and that they were  
2 proceeding without warrant. At 5:10  
3 p.m., Staff Sergeant Ferguson contacted  
4 Deputy Chief Bell and advised him that  
5 the enforcement operation would  
6 undermine PLT's negotiations, which had  
7 been proceeding for at least two hours.  
8 Staff Sergeant Ferguson informed Deputy  
9 Chief Bell that protestors were  
10 compliant. Shortly after the call  
11 ended, at 5:18 p.m., Deputy Chief Bell  
12 contacted Staff Sergeant Ferguson and  
13 informed him that he agreed with  
14 Superintendent Patterson's decision.  
15 Later that evening, Staff Sergeant  
16 Ferguson learned that Deputy Chief Bell  
17 supported Superintendent Patter's  
18 decision because three convoy vehicles  
19 had left [the] Coventry Road site and  
20 were transporting fuel to supply  
21 protestors downtown."

22 In a nutshell, that's what happened. Do you have  
23 any view on what transpired there and any thoughts on how these  
24 kind of problems or troubles could have been avoided?

25 **MR. PETER SLOLY:** Well, if that is accurate --  
26 again, it's one person's account, but for the purpose of --  
27 there's so many problems in this paragraph beyond the PLT.

28 **MR. FRANK AU:** M'hm ---

1                   **MR. PETER SLOLY:** Staff Sergeant Ferguson  
2 contacting Deputy Chief Bell ---

3                   **MR. FRANK AU:** Sorry?

4                   **MR. PETER SLOLY:** Staff Sergeant Ferguson  
5 contacting Deputy Chief Bell makes no sense to me.

6                   **MR. FRANK AU:** Why is that?

7                   **MR. PETER SLOLY:** Deputy Chief Bell is not in  
8 charge of operations in any way on February 6<sup>th</sup>. That is an  
9 internal incident command contact out of the Incident Command  
10 System to another deputy chief that doesn't have a functional  
11 role in the Incident Command System. So that alone is very  
12 confusing and concerning for me.

13                   **MR. FRANK AU:** So problem number one. Keep  
14 going.

15                   **MR. PETER SLOLY:** Problem number two, I'm going  
16 to assume that at any given time across the theory that we were  
17 dealing with here, even in the micro-red zone and Coventry Road  
18 being a 10, 15-minute drive from that, there's a lot of moving  
19 parts. If Staff Sergeant Ferguson, who probably at that point  
20 was a couple of days into his assignment, he's not trained on  
21 PLT, and has not, up until that point, been materially involved  
22 in the intelligence threat risk assessment, all of the various  
23 iterations of the operational plans, and the subplans is all of  
24 a sudden in the middle of PLT world, he's likely not aware of  
25 the larger intelligence and the larger frame of operations that  
26 Superintendent Patterson is. Even Superintendent Patterson is  
27 probably 24 hours into his job. So there's a lot of people  
28 who've been all of a sudden moved into different positions,

1 after a period of Rheaume, Dunlop, Patterson. There's a lot of  
2 confusion happening at this point. This is clearly an evidence  
3 of a suboptimal system trying to right itself. People trying to  
4 do the right things, but not really coordinating and in some  
5 places conflicting. And people trying to get help, but going up  
6 the wrong chains of command and the wrong chains of command  
7 getting involved in areas that they shouldn't be getting  
8 involved in. If this is accurate, Deputy Bell should have  
9 contacted Deputy Ferguson. There's a concern from PLT. I'm  
10 making you aware of it. Can you manage that back down? That  
11 would have been more appropriate.

12 So there's a lot of things happening here. It's  
13 on the basis of one individual's concept, and that's an  
14 individual who's probably relatively new into their position and  
15 has never been trained on PLT. So ---

16 **MR. FRANK AU:** Which one ---

17 **MR. PETER SLOLY:** --- problematic.

18 **MR. FRANK AU:** --- are you're talking about,  
19 yeah?

20 **MR. PETER SLOLY:** That big, long paragraph ---

21 **MR. FRANK AU:** No, no, which one -- who wasn't  
22 trained on PLT?

23 **MR. PETER SLOLY:** My understanding is that John  
24 Ferguson was a trained and excellent crisis negotiator ---

25 **MR. FRANK AU:** Right.

26 **MR. PETER SLOLY:** --- but was never trained on  
27 PLT as a Police Liaison Officer. That's my understanding. I  
28 stand to be corrected.

1           **MR. FRANK AU:** Right. So to summarize, we have  
2 confusion regarding the command structure, who should be  
3 reporting to whom about what. You were giving us the example of  
4 Staff Sergeant John Ferguson seeking direction from Bell.

5           **MR. PETER SLOLY:** I suspect John's substantive  
6 position is under Deputy Bell's command, and so in his brain, if  
7 I have a problem, I escalate it to my deputy. I'm assuming  
8 that.

9           **MR. FRANK AU:** Right.

10          **MR. PETER SLOLY:** That's the only reason --  
11 logical reason why he would go to Deputy Chief Bell and not go  
12 through Patterson, Deputy Chief -- Acting Deputy Chief Ferguson  
13 to get a resolution to the problem that he's facing.

14          **MR. FRANK AU:** And there were a lot of movement  
15 from one unit to another for a lot of people during those  
16 periods; right?

17          **MR. PETER SLOLY:** Absolutely.

18          **MR. FRANK AU:** And the fact that the event  
19 commanders has changed a few times, Patterson being the third  
20 commander, also didn't help. What about the fact that the PLT  
21 and the enforcement arm, which we learn were the two sides of a  
22 -- the Command Triangle, what about the fact that they didn't  
23 seem to be coordinating their actions in carrying out their  
24 respective responsibilities? Is that a big concern?

25          **MR. PETER SLOLY:** It's a big concern, sir. And  
26 again, I reiterate, I -- this is an Ottawa Police Service that  
27 its PLT program was a part-time program. PLT officers, I had  
28 approved them to get training I think in the late summer, early

1 fall of 2021. So they're a part-time group of people, who  
2 within six months get some training. We're still in COVID. I  
3 don't know how many times they've been able to utilise that  
4 training in any substantive way before the arrival of this  
5 massive unprecedented event. And then they're literally asked  
6 to do the impossible from the beginning to the end, and do the  
7 best job they possibly.

8                   But no, there isn't a optimal optimisation within  
9 this incredible unprecedented even between that Command frame,  
10 there isn't. And even with the extra help that we got from the  
11 OPP and the arrival of experts, like Inspector Beaudin, we  
12 weren't going to be able to flick a switch and all of sudden go  
13 from OPS immaturity, to OPP excellence within the dynamics of  
14 what's taking place in real-time in the City of Ottawa.

15                   **MR. FRANK AU:** So without any unrealistic  
16 expectation of flicking a switch, what are your thoughts on what  
17 we can do better in terms of avoiding these kind of troubles?  
18 What can we learn from all of this?

19                   **MR. PETER SLOLY:** Thank you. Well, first of all,  
20 again, Commissioner, with your -- the Incident Command System, I  
21 had the honour and pleasure in I think 2008, 2009, along with  
22 Mike McDonnell, then of the RCMP, and Sue Sullivan, who was then  
23 a Deputy Chief in the Ottawa Police Service. All of us had been  
24 trained up on the Incident Command System. We believed that  
25 that was the appropriate Incident Command System for the types  
26 of demonstrations we were seeing in the new century. I hate to  
27 make myself old, but that's what we were back then. And we had  
28 made presentations to the Ontario Association of Chiefs of

1 Police that to avoid integration challenges we should have a  
2 standard Incident Command approach across the province.

3           We were able to get the OACP Executive to adopt  
4 that, and that became, through that process, I don't want to say  
5 the standard because I can't say for sure, it's written into the  
6 current *Police Service Act* standards, but that became the  
7 default standard for Incident Command across the province. We  
8 attempted to that at the CACP level. I got promoted, and I  
9 don't know where that ended up. I now know there's a national  
10 framework.

11           Long way of saying we are going to increasingly  
12 have to bring large organisations together across potentially  
13 multiple sites. We need to be working off the same  
14 understanding, nomenclature process, we need to narrow that gap  
15 of a grey zone between Strategic, Operational, and Tactical. I  
16 would suggest we also need to narrow the grey zone around a  
17 working Incident Command structure as it sits into the regular  
18 business of policing in any jurisdiction or multiple  
19 jurisdictions.

20           Training needs to be standardised, nomenclature  
21 needs to be standardised, equipment needs to be standardised,  
22 joint training needs to happen, and all of that has to happen a  
23 long time before a major unprecedented paradigm-shifting event,  
24 like what we just saw arise, in any jurisdiction.

25           This is one of those structural deficits, sir,  
26 that have existed for decades in policing. It doesn't all  
27 require money, but it's going to require a little bit of  
28 investment on that end. But it requires an investment of time



1 and resources and focus.

2 And what this event did to Ottawa, to Ontario,  
3 and Canada was exposed that type of structural deficit. It's  
4 the same concept of structural deficit around intelligence  
5 gathering.

6 We can't afford to duct tape our way through  
7 these incidents anymore. Unfortunately, this reads like a duct  
8 tape effort to get through a really complicated dynamic  
9 situation.

10 I need to be clear, every name here did their  
11 best in the circumstances they found themselves in. I don't  
12 read into anything here a deliberate attempt to undermine or  
13 frustrate or cause risk to the public. It just didn't go off  
14 very well.

15 **MR. FRANK AU:** Thank you.

16 Commissioner, I note the time. We're past one  
17 o'clock. Would this be an appropriate time to break?

18 **COMMISSIONER ROULEAU:** Okay. So we'll take the  
19 lunchbreak for an hour, and come back to continue the evidence.  
20 Thank you.

21 **THE REGISTRAR:** The Commission is in recess for  
22 one hour. La Commission est levée pour une heure.

23 --- Upon recessing at 1:08 p.m.

24 --- Upon resuming at 2:09 p.m.

25 **THE REGISTRAR:** Order. À l'ordre. The  
26 Commission is reconvened. La commission reprend.

27 **MR. ERIC BROUSSEAU:** Good afternoon,  
28 Commissioner. For the record, Eric Brousseau, Commission

1 Counsel. Very, very briefly, I just rise to give notice  
2 formally. The documents that the Police Team is bulk entering  
3 this week, it -- my colleague Mr. Mather sort of explained the  
4 process on the record I believe last week. We circulated a list  
5 last week. We received objections. Those documents have been  
6 removed from the list and Commission Counsel will deal with  
7 those objections with the parties. The final list was  
8 circulated to the parties this morning and those documents will  
9 be marked as exhibits. They are a number of emails and other  
10 documents from the OPS, the OPP, the WPS, Windsor Police  
11 Service, as well as a few RCMP documents and the City of Ottawa  
12 documents, and including witness summaries for witnesses who,  
13 importantly, are not going to be called to testify, but whose  
14 evidence we wish to put in by way of summary.

15 **COMMISSIONER ROULEAU:** Okay. Thank you.

16 So with that parenthesis, go ahead. Okay. Thank  
17 you.

18 **MR. FRANK AU:** Commissioner, before I continue  
19 with the examination, just to clarify for the record, when I put  
20 the notes of Superintendent Rheume to the former Chief Sloly,  
21 Mr. Champ correctly pointed out that those notes were not put to  
22 Deputy Chief Ferguson in our examination, but she did, in  
23 fairness to her, say both in her interview summary as well as in  
24 her evidence that Superintendent Rheume was removed for  
25 personal reasons. He needed a rest or some rest days, so she  
26 did not say anything about his removal being connected to the  
27 former Chief. I just wanted that to be clarified on the record.

28 **COMMISSIONER ROULEAU:** Okay.

1 --- MR. PETER SLOLY, Resumed:

2 --- EXAMINATION-IN-CHIEF BY MR. FRANK AU (Cont'd):

3 **MR. FRANK AU:** Now, Chief Sloly, just before the  
4 lunch break, we spoke about a number of issues that I also  
5 wanted to clarify so that there's no misunderstanding. First of  
6 all, I asked you about the date when you found out that  
7 Superintendent Rheaume was replaced by Superintendent Dunlop,  
8 and I believe you said that was on the 5<sup>th</sup> of February.

9 Now if I could take you to a document, I want to  
10 see if that would refresh your memory. OPS00014484. So if we  
11 go to page 2.

12 So it appears that on the 3<sup>rd</sup> of February, these  
13 are, again, notes to yourself. On the 3<sup>rd</sup> of February at around  
14 -- well, in the morning, you attended a meeting with both  
15 deputies on Teams with Superintendent Dunlop. What was your  
16 understanding as of the 3<sup>rd</sup> about Superintendent Dunlop's role if  
17 he was not the event commander?

18 **MR. PETER SLOLY:** Thank you. On the whole, sir,  
19 I wasn't sure what his role was. I had understood that Staff  
20 Sergeant Mike Stoll would be the primary presenter of the  
21 analysis that came out of that meeting on the 1st; a range of  
22 three options, I have described them, but not necessarily  
23 accurately as to what they would come back with; and a preferred  
24 option, including the implications of resources, et cetera, et  
25 cetera.

26 On the 3rd, if that's the Thursday, that would be  
27 the Thursday, there were two, yes, there were two meetings, one  
28 at 10:30, and then another one I think maybe around 12 o'clock,

1 where I was waiting for Mike Stoll to give that presentation. I  
2 think the notes indicate that he wasn't available, the  
3 presentation wasn't on what I had asked for, and I was saying,  
4 "Look, I just want that presentation that I had asked for."

5 So there were two I would call aborted attempts  
6 to provide that on the Thursday morning, the first one around  
7 10:30, the next one around 12 o'clock or so if my mind is  
8 accurate. Finally, the third attempt, which occurs I think on  
9 the afternoon I think of the 5th, the Saturday, I get the three  
10 options, I get their preferred option at that point.

11 So I'm still not sure even at this time why  
12 Dunlop is, Jamie Dunlop, sorry, Superintendent Dunlop is  
13 involved in the presentation and what his role in it is. My  
14 recollection, I stand to be corrected, is he wasn't introduced  
15 as the Interim Event Commander or the Event Commander, that's my  
16 recollection, and my confusion is based on that point.

17 **MR. FRANK AU:** Okay. The other thing that we  
18 spoke about was with respect to the Coventry incident, and we  
19 were attempting to draw some lessons from that event.

20 One of the issues you identified was the fact  
21 that Staff Sergeant John Ferguson went outside the Incident  
22 Command System when he sought guidance from Deputy Chief Bell.  
23 Now, if Staff Sergeant Ferguson were -- if he had concerns about  
24 the direction that he was getting from Event Commander Mark  
25 Patterson, Superintendent Patterson at that time, who should he  
26 have gone to?

27 **MR. PETER SLOLY:** So while it was confusing,  
28 again, I don't want to characterise it as he did the wrong

1 thing, I just want to be clear about that, John Ferguson, there  
2 would have been options. John could have gone to the Incident  
3 Commander, which at this time should've been Russ Lucas. He  
4 could've gone to the Event Commander and explained -- attempted  
5 to further explain, and if that wasn't happening, he could've  
6 gone to the Major Event Commander, in that case -- Major  
7 Incident Commander, in that case it would have been Acting  
8 Deputy Chief Ferguson. So there were options for him to engage.  
9 I understand it seems to have been he was doing his best to get  
10 people engaged around something he thought was important.

11 **MR. FRANK AU:** But just so we understand,  
12 Superintendent Patterson was Inspector Lucas's superior. If he  
13 was challenging a decision by Superintendent Patterson, wouldn't  
14 it be problematic for him to go to somebody who reported to  
15 Superintendent Patterson?

16 **MR. PETER SLOLY:** Challenging, but still  
17 appropriate. There is an Incident Command chain of command and  
18 then there's an organisational chain of command. So at any  
19 point when there is a disagreement in the chain of command, if  
20 done professionally, if done timely, and if done seeking a  
21 constructive outcome, not for rumourmongering, not for  
22 undermining, not for any other personal agenda, you can engage  
23 that chain of command in trying to reach some sort of a better  
24 outcome. I think that would be appropriate.

25 **MR. FRANK AU:** Now, I understand from  
26 Inspector Lucas's interview summary that he thought by that  
27 time, around 5th or 6th of February, he had -- his role had  
28 diminished to more akin to an Operations Chief at the tactical

1 level. So if Staff Sergeant John Ferguson had issues about the  
2 Operations, is it not arguable that he shouldn't have gone to  
3 Inspector Lucas?

4 **MR. PETER SLOLY:** And I -- again, I want to be  
5 careful. I received that through information that's been  
6 presented at the testimony. Myself, I wasn't aware of that, so  
7 it's new information for me. That Inspector Lucas's perspective  
8 on his changed role is new information for me.

9 If that was materially the case, if that was  
10 known to everybody, and if it was known to John Ferguson, yes,  
11 he would then have another challenge of who could he turn to, I  
12 would accept that, but this is all new information to me too.  
13 So it's just conjecture, sorry, conjecture at this point to try  
14 to answer your question, sir.

15 **MR. FRANK AU:** And I appreciate that you are  
16 doing the best you can. We're also trying to understand what  
17 lessons to draw from it. We just don't want to draw the wrong  
18 lessons.

19 So the other option that you identified was for  
20 Staff Sergeant John Ferguson to perhaps approach Deputy  
21 Chief Ferguson because she was by then the Major Incident  
22 Commander. But wasn't that also problematic because they are  
23 married?

24 **MR. PETER SLOLY:** At some risk to go into the  
25 realm of conflict of interest in relationships and organisation,  
26 I mean, that's -- there is that challenge, but in the frame of  
27 the Ottawa Police Service at that time, there wasn't any breach  
28 of policy. And so it would've been appropriate if he felt it

1 had, again, you know, constructive, objective, not  
2 unprofessional, not undermining, not self-seeking, to have  
3 sought the intervention of or at least to have provided his  
4 information to the Major Incident Commander.

5 I do also recognise, if I understand the context  
6 as to what happened, this is sort of a real-time unfolding  
7 event. It seems to me, again, I may be wrong, it seems to me  
8 that there wasn't an opportunity for Staff Sergeant Ferguson to  
9 wait for a briefing cycle to raise the concern when all the  
10 people would've been around the table, and then that would've  
11 allowed Acting Deputy Chief Ferguson, or even  
12 Superintendent Patterson, to reconsider. It seemed like he was  
13 trying to get a real-time decision in the midst of an operation.

14 So the third option would've been to wait for a  
15 briefing cycle, raise it as part of the briefing cycle to try to  
16 deconflict it and make it better going forward. I don't think  
17 it was appropriate in that circumstance.

18 **MR. FRANK AU:** Right. So because there are some  
19 uncertainties about the circumstances, we shouldn't be too quick  
20 perhaps to ---

21 **MR. PETER SLOLY:** I certainly can't be quick to  
22 judge or to in any way attribute blame. But I think,  
23 Commissioner, it goes back again, these are the still need to be  
24 developed areas of consistent-across-the-board understanding of  
25 Incident Command Systems within the operation of a Policing  
26 Service that clearly, here in the Ottawa Police Service, and  
27 other jurisdictions, we need to get to a higher level. There  
28 are examples of excellence across the country, I think we need

1 to try to raise that -- raise all boats in the harbour as high  
2 as we can, sir.

3 **MR. FRANK AU:** Thank you.

4 So let's move to a new topic. You've told us  
5 earlier that the Ottawa Police Service was badly in need of  
6 external help. It needed more resources to resolve the  
7 situation on the ground.

8 I want to take you to a document. This is  
9 OPS00014454.

10 So you see that the document is dated  
11 January 31st, so this is the first Monday after the arrival of  
12 the convoy, and it looks like it's a meeting with the RCMP and  
13 the OPP. You were there.

14 If we go down the page.

15 You see the notation:

16 "Can't safely remove them unless we  
17 have hundreds of officers to maintain  
18 risk."

19 And then if we go down further, "No way we can  
20 come-by", not sure. What's that word? "4 more days w/out"  
21 something "help", "lots of help".

22 **MR. PETER SLOLY:** Lots of help.

23 **MR. FRANK AU:** Was that the -- and then the next  
24 line says, "Now transitioned into an occupation."

25 Does this reflect the thinking at the time on or  
26 about the 31st, that the OPS will need hundreds of officers in  
27 order to safely remove the protesters?

28 **MR. PETER SLOLY:** Yes, sir.



1                   **MR. FRANK AU:** And then if we go to the next  
2 page.

3                   "We need..."

4                   Sorry, go down a bit. Oh, sorry, go down.

5                   Oh, go up, sorry:

6                                 "We need resources and..."

7                   What is that next word?

8                   **MR. PETER SLOLY:** It looks like "communications".

9                   **MR. FRANK AU:**

10                                 "...(saying together) Joint together at  
11                                 3:00 p.m.?"

12                   Do you recall these discussions at that meeting?

13                   **MR. PETER SLOLY:** Yes. I mean, specific lines,  
14 not as clear, but I recall the meeting with Commissioner Lucki  
15 and, I believe, Commissioner Carrique. I don't know who else  
16 would have been on the call.

17                   **MR. FRANK AU:** And if we go down the page a  
18 little, there's a comment from Trish. Maybe go to the next  
19 page, here:

20                                 "Looking for boots on the ground."

21                   What did you understand her to mean?

22                   **MR. PETER SLOLY:** Those would be your sort or  
23 general duty officers, traffic directions, taking a traffic  
24 point along the red zone, patrol, just general duty officers  
25 that could be utilized in a variety of different ways.

26                   **MR. FRANK AU:** So do you understand the request  
27 at that time was for general duty officers from the RCMP and the  
28 OPP?

1                   **MR. PETER SLOLY:** Well, she outlines ---

2                   **MR. FRANK AU:** And the other ---

3                   **MR. PETER SLOLY:** Yeah, that's the running list  
4 that she was asked to sort of, you know, come up with on the  
5 spot. I think it's actually a pretty reasonable list based on  
6 what we knew at that time and where we were.

7                   **MR. FRANK AU:** And how did the Commissioners  
8 Carrique and Lucki answer?

9                   **MR. PETER SLOLY:** Well ---

10                  **MR. FRANK AU:** I can -- we can scroll down.

11                  **MR. PETER SLOLY:** Yeah.

12                  **MR. FRANK AU:** From Commissioner Carrique:

13                                 "We will facilitate all of your  
14                                 requests and get embedded in the  
15                                 command structure."

16                  **MR. PETER SLOLY:** Yes.

17                  **MR. FRANK AU:** So you had a commitment from  
18 Commissioner Carrique as of the 31<sup>st</sup> that they would do all they  
19 could to assist and they were willing to embed in the OPS  
20 command structure. And then Commissioner Lucki from the RCMP:

21                                 "Why did negotiations fall through last  
22                                 night at 8:00 p.m.?"

23                                 What was that about; what negotiations?

24                  **MR. PETER SLOLY:** I'm not sure. I'm not sure  
25 what she's referencing.

26                  **MR. FRANK AU:** And then, if we go further down,  
27 there's a comment attributed to you:

28                                 "Reach out to..."

1 Do you see?

2 **MR. PETER SLOLY:** "Gatineau and Sûreté de  
3 Québec".

4 **MR. FRANK AU:** Right. So you extended the ask to  
5 Gatineau and Sûreté as well?

6 **MR. PETER SLOLY:** Yes.

7 **MR. FRANK AU:** Do you know what kind of help at  
8 this time the OPP and the RCMP were offering? We know what you  
9 asked for but do you remember they were committed to providing?

10 **MR. PETER SLOLY:** I understand the question.  
11 They had already had resources in the theatre. Again, I stand  
12 to be corrected by other information that might come up. RCMP,  
13 I believe, had three, what they call, "troops", Public Order  
14 Units in the National Capital Region. They were not under our  
15 incident command system control but they were available in an  
16 emergency and they had, certainly, a range of important duties  
17 to manage. I believe, at that point, we still had OPP Public  
18 Order Units, again not -- if I understand correctly, not under  
19 our incident command, supporting Parliamentary Protective  
20 Services but, again, in the theatre -- general area of the  
21 theatre.

22 Within -- what I would say within the incident  
23 command system deployment, there were general duty officers from  
24 the OPP somewhere in the range of 30, 40, 50 -- and I stand to  
25 be corrected on numbers -- as well as a range of other municipal  
26 police services agencies' contributions, London Police, Durham  
27 Regional Police. I think Toronto might have been up at that  
28 point. Most of those were Public Order Unit officers, though,

1 as opposed to general duty officer. That's my recollection  
2 around the January 31<sup>st</sup>.

3 **MR. FRANK AU:** Okay. If I could take you to the  
4 next document, which is an email that you sent to Commissioner  
5 Carrique dated February 2<sup>nd</sup>. The document number is OPP00001576.  
6 So this was sent February the 2<sup>nd</sup>? On the first line, you see  
7 that you wrote:

8 "I'm seeking your assistance in  
9 providing resources to assist the  
10 Ottawa Police with our operational  
11 plan."

12 The subsequent bullets mention 50 to 60 uniform  
13 officers, PLT and POU supports, as well as incident command  
14 supports. And then the next line talks about a tactical  
15 dispatcher. So were these the nature of the request?

16 **MR. PETER SLOLY:** Yeah, so those would have been  
17 -- I'm assuming that that would have been a refined list of  
18 requests that I received from Acting Deputy Chief Ferguson who -  
19 - she had -- she would have received through her incident  
20 command chain of command.

21 **MR. FRANK AU:** Now, in testimony yesterday from  
22 Commissioner Carrique, he was asked about a formal request and  
23 the implications of a formal request under the *Police Services*  
24 *Act*, Section 9(6). Just to be clear, your request here, was  
25 that the kind of formal request under the *Police Services Act*?

26 **MR. PETER SLOLY:** I may not be understanding the  
27 question, sir. Sorry.

28 **MR. FRANK AU:** So it may help if we take you to

1 the Act, COM00000819. You're familiar with the provision I'm  
2 referring to, right?

3 **MR. PETER SLOLY:** I'm not that familiar with it.

4 **MR. FRANK AU:** Okay, so let's go to the Act and  
5 look at it together. So this is the *Police Services Act*, if we  
6 could go to page 12. So under "Request of chief of police in  
7 emergency" -- this is Section 9(6):

8 "A municipal chief of police who is..."

9 **MR. PETER SLOLY:** Sorry, I'm just not seeing it  
10 on my screen. Am I missing?

11 **MR. FRANK AU:** Oh, at the top. Do you see ---

12 **MR. PETER SLOLY:** Oh, okay, sorry. Thank you.

13 Sorry, I missed it.

14 **MR. FRANK AU:** Do you see the heading ---

15 **MR. PETER SLOLY:** Yes.

16 **MR. FRANK AU:** --- "Request of chief of police in  
17 emergency" in bold?

18 **MR. PETER SLOLY:** So I ---

19 **MR. FRANK AU:** Maybe it's the screen.

20 **MR. PETER SLOLY:** I'm aware -- I'm aware of the  
21 language in the Act but I wasn't, in my mind, referencing this.  
22 If it happens to fit it, that's fine.

23 **MR. FRANK AU:** Well, that's my question. When  
24 you wrote the letter, you were not having in mind this section -  
25 --

26 **MR. PETER SLOLY:** No ---

27 **MR. FRANK AU:** --- under the *Police Services Act*?

28 **MR. PETER SLOLY:** --- I was simply sending a

1 communication to another chief or commissioner asking for  
2 resources.

3 **MR. FRANK AU:** What do you understand to be the  
4 difference of requests formally under Subsection 9(6) or the  
5 kind of informal request that you appear to have sent?

6 **MR. PETER SLOLY:** I will say, I have never in my  
7 policing career relied on this section so I don't have a --  
8 other than what's written on the page, this would seem to be, if  
9 we needed more officers, we could ask the -- or resources, we  
10 could ask the OPP. But I -- I mean, if this -- if this is  
11 intended to -- and again, I'm not aware of what's underneath  
12 this. If this means, "We can't manage -- we can't adequately  
13 and effectively continue to be the police of jurisdiction. Can  
14 you come and do this for us?" I wouldn't interpret that that way  
15 and that was certainly not the intent of me sending that letter  
16 to OPP Commissioner Carrique to ask for those resources.

17 **MR. FRANK AU:** Well, that is -- that is where I'm  
18 going because perhaps it is open to interpretation but certainly  
19 one interpretation is that the OPP had the ability to step in  
20 and take the lead.

21 **MR. PETER SLOLY:** I believe there's certain  
22 conditions that would have to be met. They couldn't just  
23 arbitrarily make that decision.

24 **MR. FRANK AU:** And that's why I'm asking you, if  
25 a request is made under this section, would you have been  
26 comfortable to let the OPP take more of a lead role under this  
27 section?

28 **MR. PETER SLOLY:** If I felt the conditions in

1 Ottawa required that level of intervention from the OPP or any  
2 other police service, I would obviously be making that request  
3 and therefore be very comfortable with it, subject to all the  
4 usual discussions as to how that would transpire. But I was not  
5 making that request.

6 **MR. FRANK AU:** You were not making that request.  
7 And I guess my question is, given the situation that you found  
8 the OPS to be in shortly after the -- what you call "the  
9 paradigm shift", after the first weekend ---

10 **MR. PETER SLOLY:** M'hm.

11 **MR. FRANK AU:** --- isn't that something that  
12 should have been done, logically?

13 **MR. PETER SLOLY:** Not at all, sir.

14 **MR. FRANK AU:** Why not?

15 **MR. PETER SLOLY:** We were three days, 72 hours  
16 into a situation. I don't think anybody in Canada at that time  
17 really understood what was going on and I think it would have  
18 been irresponsible and unnecessary to burden another police  
19 service with that level of request without having any real  
20 understanding. So I just don't think there's -- listen, you  
21 could talk to other police chiefs and they may have their  
22 opinions but as of the 31<sup>st</sup> or the 2<sup>nd</sup>, when I sent that letter,  
23 that was a not situation that I was considering at all. That's  
24 not a situation that anybody had raised to me either within the  
25 Ottawa Police Service or from the Police Services Board, just  
26 not in the realm of considerations.

27 **MR. FRANK AU:** Did the situation in Ottawa  
28 escalate at some point to a stage where you would have

1 considered that appropriate?

2 **MR. PETER SLOLY:** Not during my tenure, sir, no.

3 **MR. FRANK AU:** So in your view, up until mid-  
4 February -- February the 15th was your last day as the chief --  
5 the situation was not desperate enough in Ottawa to -- for the  
6 chief to be requesting that kind of assistance from the OPP?

7 **MR. PETER SLOLY:** That's correct, sir.

8 **MR. FRANK AU:** What would be the downside to the  
9 OPP stepping in when they had the resources and if they were  
10 willing to help?

11 **MR. PETER SLOLY:** The OPP never had the resources  
12 necessary, sir. They could coordinate the resources, and they  
13 did a good job of that, but the OPP on its own could not have  
14 come in and with its totality of its compliment, provided the  
15 full level of some 2,200 officers that were required.

16 **MR. FRANK AU:** Well, they alone might not have  
17 been enough, as we know. During the final days, both the OPP  
18 and the RCMP stepped in. But certainly, the OPP had more  
19 resources than the OPS had at the time.

20 **MR. PETER SLOLY:** The quantity of resources,  
21 while being a factor, would not be, even in my humble opinion, a  
22 significantly weighted factor for such a decision as for a chief  
23 of police in any jurisdiction to request through section 9 of  
24 the Act for another police service to come in and run its police  
25 service.

26 **MR. FRANK AU:** But in addition to quantity, they  
27 also seem to have the right expertise such as the -- as we'll  
28 come to talk about it, the group led by Chief Pardy, the



1 Integrated Planning Group. They had the expertise, they had the  
2 capacity, they were willing to help, they were offering help;  
3 why not?

4 **MR. PETER SLOLY:** There's a lot of things they  
5 had, and they offered those things, and we utilized them as  
6 quickly and as effectively as we could. And ultimately, through  
7 to my -- end of my tenure and beyond that, there was a very  
8 successful outcome.

9 But you've asked me before, did the circumstances  
10 in Ottawa rise to the occasion of what I now understand to be a  
11 function of section 9? No, they didn't, sir.

12 **MR. FRANK AU:** Right. So this is the letter --  
13 sorry, if we can take this off, the *Police Services Act*. You'll  
14 remember we were -- we looked at an email, this one, that was  
15 your request.

16 I want to take you to another email that you sent  
17 on the 4th. So this request was sent on the 2nd. On the 4th of  
18 February, we have another email, OPP00001582. That's right.  
19 This is the part I want to take you to.

20 You address this email to Commissioner ---

21 **MR. PETER SLOLY:** Sorry, what's the date of this,  
22 please? Sorry.

23 **MR. FRANK AU:** The 4th of February.

24 **MR. PETER SLOLY:** Thank you.

25 **MR. FRANK AU:** So you address this email to  
26 Commissioner Carrique. You said:

27 "Once again, let me express my  
28 appreciation for the significant and

1                   ongoing support that you and your OPP  
2                   team have provided to the OPS over the  
3                   course of the demonstrations."

4                   It would appear from this reply that you received  
5                   the additional resources that you requested?

6                   **MR. PETER SLOLY:** The short answer is yes. I  
7                   don't know if we got everything that we asked for and when we  
8                   got it, but again, at this point, I have no concerns whatsoever.  
9                   I think this is more just I'm actually seeing some of the most  
10                  well turned out OPP officers and vehicles operating in and  
11                  around my -- in fairness, they really just looked good. They  
12                  were like the cavalry coming over the hill and they were just  
13                  really well turned out, really professional group of officers.  
14                  So I'm just complimenting Chief to Commissioner the quality of  
15                  his people.

16                  **MR. FRANK AU:** M'hm. On the 2nd of February  
17                  when you send the request to the OPP, I believe you also sent a  
18                  request to the RCMP. Let's take a look at PB.NSC.CAN.00001743.

19                  So this is a -- actually, this is your reply.  
20                  February 2nd, "Thank you, Commissioner Lucki."

21                  If we go further down -- that's right -- we see  
22                  an email from her to you, and at the bottom paragraph -- sorry,  
23                  go up a bit, the paragraph that starts with, "At present".

24                  "At present, all of our Public Order  
25                  Units are actively deployed and I'm not  
26                  in a position to be able to redirect  
27                  any teams to Ottawa."

28                  Do you have a memory of what you were asking for

1 and what this response was meant to address?

2 **MR. PETER SLOLY:** Sorry, just -- again, the date,  
3 is this February ---

4 **MR. FRANK AU:** The 2nd.

5 **MR. PETER SLOLY:** --- 2nd. So this is again,  
6 this would be around the time that we are pivoting the plan. We  
7 know we're going to need -- this is the day after the February  
8 1st Kanata meeting. We know we're going to need a substantive  
9 amount of POU, short term and long term, and so this was a  
10 request that I sent out to the RCMP for POU at least. I don't  
11 know if there were other things that we asked, and it seems that  
12 the substantive response here is, you know, "Our POU units are  
13 deployed. You can't get them."

14 Reasonable. I'm not challenging that. They're  
15 having their own resource challenges and they're exploring the  
16 possibility of the other 50 resources. I'm assuming they're  
17 police officers, but there might have been a variety of  
18 different knowledge, skills, and abilities that we were asking  
19 for.

20 **MR. FRANK AU:** So these are examples of the kind  
21 of early requests following the paradigm shift and the kind of  
22 responses you got?

23 **MR. PETER SLOLY:** Yes, sir.

24 **MR. FRANK AU:** On the 6th of February, I  
25 understand that you told the mayor and Chair Deans that you  
26 needed 1,800 additional resources; am I correct?

27 **MR. PETER SLOLY:** It's 1,790 odd, but yes. I  
28 think the number 1,800 has become the most functionally used

1 number.

2 **MR. FRANK AU:** M'hm. Let's go to an OPS  
3 document, 00014454, page 98. So there's a reference here, 1,800  
4 additional members that came from other services.

5 **MR. PETER SLOLY:** Sorry, the date of this again,  
6 sir, sorry?

7 **MR. FRANK AU:** Can we scroll up? February 6th --

8 -

9 **MR. PETER SLOLY:** Thank you.

10 **MR. FRANK AU:** --- 5:10 p.m.

11 So am I correct that the number 1,800 was  
12 communicated as early as the 6th of February?

13 **MR. PETER SLOLY:** Yes. So again, just context-  
14 wise, there was an emergency board meeting held on February 5th.  
15 During that meeting, the public session, I received a direction  
16 from the chair of the board to produce a list of all the  
17 resources that we thought we would need to -- my words --  
18 safely, successfully, lawfully end the events in Ottawa.

19 I needed explicit understanding from the chair,  
20 did she need that on the spot or could we -- could I and my team  
21 take that away and then provide a more thoughtful and full  
22 response, and she said yes, the team had -- I had asked can they  
23 try to turn that around in 24 hours, and I think by this time,  
24 which is almost 24 hours later, we had a substantive list that  
25 was drawn up. And it wasn't just police resources, this also  
26 included discussions around what other things could the City  
27 help us with, increase bylaw fines, other potential supports  
28 from the City and civil society. I think we were looking at the

1 insurance industry, whether they could help us to address some  
2 of the issues around the trucks and vehicles.

3 So that's the background to, I think, this  
4 meeting.

5 **MR. FRANK AU:** How did you derive the 1,800  
6 number from?

7 **MR. PETER SLOLY:** Again, without the benefit of  
8 notes, but at some point after the board meeting, there would  
9 have been a request at two levels within the Incident Command  
10 System for their planners to identify the number, types of  
11 resources, and associate that to the overall operational plan  
12 and the relative sections -- sorry, sub-plan sections -- then  
13 across the organization.

14 I asked each of the functional commanders -- so  
15 that would again include Acting Deputy Chief Ferguson in her  
16 functional role, Deputy Chief Bell in his functional role, and  
17 Chief Administration Officer Dunker in her functional role to  
18 identify supports. The reason for the two, sort of, coordinated  
19 requests, we needed a certain level of capability, resource  
20 capability, and predictability within the incident command  
21 structure to work under that structure to achieve the goals of  
22 ending the events in Canada, but we were still struggling with  
23 staffing for our policing jurisdiction responsibilities.

24 And I don't know if at this time we'd finished  
25 the negotiation with the Ottawa Police Association for the shift  
26 schedule change, but we were struggling on both ends, staffing  
27 to a level beyond just maintaining the red zone through the  
28 incident command piece, and staffing to maintain our contractual

1 obligations and member health and wellness requirements in the  
2 general police services to the rest of the million residents in  
3 the city. The sum total of those 1,790 odd resources reflects  
4 all of the different aspects that we were looking for and they  
5 were broken down short-term, mid-term, longer-term. The bulk of  
6 the resources, I would suggest, were more short term, A  
7 significant amount was mid-term, and then another amount would  
8 have been long-term. That would have been assisting in  
9 prosecutions after the fact, the case management, crime analyst,  
10 all that together. But the bulk of that request really was in  
11 the days and weeks, as opposed to the months and years portions  
12 of some of it.

13 **MR. FRANK AU:** Now, I understand that later that  
14 day, on the 6<sup>th</sup> of February, there was a command team meeting  
15 where you asked your team about the resource needs.

16 **MR. PETER SLOLY:** Later on the 6<sup>th</sup>?

17 **MR. FRANK AU:** On the 6<sup>th</sup>. Does that accord with  
18 your recollection?

19 **MR. PETER SLOLY:** Again, just so many different -  
20 --

21 **MR. FRANK AU:** Right.

22 **MR. PETER SLOLY:** --- meetings. If you could  
23 show it to me, I might have a recollection.

24 **MR. FRANK AU:** And the Commission has heard  
25 evidence from Supt. Abrams that he was present and overheard  
26 some of the things that you said to your team -- or not  
27 overheard, he was there. He was invited to attend. And the  
28 next day, he wrote to his superiors, including Chris Harkins,

1 among others, about what he observed on the 6<sup>th</sup>.

2 So can we go to that email? If only I had the  
3 document number. OPP00001546.

4 **MR. PETER SLOLY:** Just for clarity, sir, just  
5 while the document is being searched, my understanding, and I  
6 stand to be corrected, I had a meeting with my command team on  
7 the afternoon of the 5<sup>th</sup>, after the board meeting was over, where  
8 I was interrupted for part of the meeting, had to leave to go  
9 out for a phone call and come back, and it was in that meeting I  
10 said, "Look, we've just gotten direction from the Chair. We  
11 need to produce this over the next day. Start thinking about  
12 what you need. This is a big lift that we're going to have to  
13 do."

14 Then on the 6<sup>th</sup>, after my team had worked through  
15 the night, through the day, the number of 1,790 odd was broken  
16 out into various functions. So if it -- Supt. Abrams'  
17 recollection of that comment, it should have been, in my memory,  
18 on the 5<sup>th</sup>, not on the 6<sup>th</sup>. But I stand to be corrected.

19 **MR. FRANK AU:** I could be off on the dates. I --  
20 but the date of the email is not in question. The date of the  
21 email is the 7<sup>th</sup>, as you can see on the screen. And it was on  
22 the 7<sup>th</sup> that Supt. Abrams wrote to his superiors, including  
23 Deputy Commissioner Harkins, and this is what he wrote:

24 "Deputy,

25 I did not want to mention this on the call  
26 with the group but [I] feel it important  
27 for you to have this information. On my  
28 call with OPS Command last night Chief

1                   Sloly asked his people to send him their  
2                   resource needs. They told him that they  
3                   need 250 members a day to run things.  
4                   Chief Sloly told them that if they need  
5                   100 he will ask for 200, if they need 200  
6                   he will ask for 400. He seemed very  
7                   comfortable asking for twice what he  
8                   really needed. He looks at it that it  
9                   [sic] the other partner police agencies  
10                  can't meet the ask number then Ottawa may  
11                  still get more than they really need..  
12                  Was a very strange call to be a part of.  
13                  Hearing the Commissioner say that he may  
14                  ask for a thousand members I felt you  
15                  should be aware of the above."

16                  So that's what he wrote about his observation the  
17                  night before when he attended the meeting with the OPS command.  
18                  What do you have to say to this?

19                  **MR. PETER SLOLY:** It's a very strange  
20                  interpretation by Supt. Abrams.

21                  What I can tell you was that at one of the  
22                  meetings that I recall on the 5<sup>th</sup>, maybe it was the 6<sup>th</sup>, but what  
23                  I recall on the 5<sup>th</sup>, I said to my folks, "Up until now, I've been  
24                  getting requests that I would call incremental. What we need to  
25                  get through this day or this weekend. What we need to do, and  
26                  what the Board Chair has asked us to do, is what do we need to  
27                  get to a safe, complete, successful, sustainable end to the  
28                  events happening here in Ottawa? This could take weeks, so I



1 need you not to think incremental. I don't want you just to  
2 think in a short-term cycle of planning. I need you to think  
3 exponential, short, medium, and long-term." It's in that  
4 context, I don't know if I gave the exact if they say 100, 200,  
5 but "Don't let your thinking be incremental. You have to be  
6 able to consider the full range of resources. We're not going  
7 to get to be able to make this request again, so think about  
8 everything you might need. A special constable, crime analyst,  
9 computer dispatcher, someone who can do open-source social  
10 media. Whatever you don't have right now to meaningfully  
11 contribute to the end of this -- these set of events, or to not  
12 be able to continue delivering our basic police services, this  
13 is the time to put that resource request into this."

14           So I was not, in any way, trying to put any other  
15 police service in a situation where they would need to give us  
16 things that we did not need. If it was interpreted that way by  
17 Supt. Abrams as a guest on that meeting, that's unfortunate. If  
18 it was reported that way to the Commissioner, that's very  
19 unfortunate.

20           **MR. FRANK AU:** Now, we've heard from other  
21 witnesses, we've asked other witnesses the question what should  
22 go first, the plan or the request. Is it the number that drives  
23 the resources, or sorry, the plan, or the other way around?  
24 What's your view on that?

25           **MR. PETER SLOLY:** You'll very rarely hear me  
26 agree to an or. I'm always an and person. So it isn't one or  
27 the other. Particularly in fluid events that literally up until  
28 the day of the 29<sup>th</sup>, no one really knew what was coming, the plan

1 will always need to make adjustments, in real time, sometimes.

2 But at any point, where you have to make a  
3 commitment to some portion of the plan, you need to have some  
4 relative insurance of the predictability of the resources  
5 available.

6 So these are not consecutive exercises. They are  
7 almost inevitably concurrent exercises.

8 A lot of my concern about how this whole issue  
9 has been portrayed is it's been portrayed as one or the other,  
10 and the preferred one seems to be planned before resources,  
11 consecutive.

12 In this instance in real time events, whether  
13 they be natural disasters, or unplanned protests, or protests  
14 that are so fluid in the making that you don't have the benefit  
15 of months or even weeks of advanced planning, you're literally  
16 making resource requests in real time as the threat assessment  
17 or the context of the circumstances change.

18 We saw that play out in the pre-arrival plan.  
19 You asked the question earlier on. As the warnings increased,  
20 did your resource requests increase? Yes, they did. Not  
21 because we stopped everything and wrote a perfect plan for the  
22 next resource request. We continued with the planning process,  
23 while we continued with the intelligence process, while we  
24 continued with the recourse request process.

25 And quite frankly, that has been the way that I  
26 have seen Toronto Police Service work in all my time there, that  
27 has been the way that the Toronto Police Service supported many  
28 other jurisdictions, that is the way that my experience with the

1 Ottawa Police Service was during my time as Chief. I had never,  
2 never once before in my entire career been asked to provide a  
3 fully detailed plan with subplans laid out, timing, and exact  
4 details and logistics as to where people were going to sleep,  
5 what uniforms they should bring, before we sent out a request in  
6 good faith to good police partners and said, "We've got  
7 something big. It's happening right now, or it's happening two  
8 days from now. This is our best guess of what we need. We  
9 might need to fine tune that. Can you help us? Yes or no?"

10 **MR. FRANK AU:** M'hm. Now, a moment earlier, I  
11 think you clarify that it was on the evening of the 5<sup>th</sup> that your  
12 team started working on the numbers?

13 **MR. PETER SLOLY:** It's my recollection, but  
14 again, if my dates are off, I stand to be corrected.

15 **MR. FRANK AU:** I don't know which dates may or  
16 may not be off. I just want to bring to your attention what is  
17 in your summary and give you a chance to correct anything if  
18 necessary.

19 Can we go to the former Chief's summary at page  
20 31, please?

21 So ---

22 **MR. PETER SLOLY:** Can we just -- I'm seeing --  
23 sorry. I'll let you finish. Sorry.

24 **MR. FRANK AU:** No, go ahead.

25 **MR. PETER SLOLY:** It looks like it was my  
26 mistake.

27 But just refresh my memory. Can we go to the  
28 5th? Is there any reference of the Board meeting on the 5th of

1 February?

2 **MR. FRANK AU:** Well, here's the thing. The  
3 reference is in the previous page, on this page to the 6th and  
4 the 7th. I don't think there's a reference to the 5th.

5 But you saw an earlier email dated the 6th where  
6 you had the 1,800 number; right?

7 **MR. PETER SLOLY:** Yeah.

8 **MR. FRANK AU:** So I'm just trying to get some  
9 clarification in terms of when your team worked on the number in  
10 order for it to be available on the 6th.

11 **MR. PETER SLOLY:** Again, my recollection -- sorry  
12 to interrupt you, sir. I shouldn't talk over you. Sorry.

13 My recollection was that we started those  
14 discussions immediately after the conclusion of the Board  
15 meeting on the 5th. Now, that might have been the command team  
16 and I, my immediate chief staff, might have started that  
17 discussion and then on the 6th, the Incident Command Team and  
18 other command areas were briefed and then involved, so there  
19 might be some -- a bit of a bleed-over from my recollection, me  
20 actioning these things on the 5th, to whatever the meeting was  
21 on the 6th Superintendent Abrams was participating in.

22 **MR. FRANK AU:** So depending your best  
23 recollection, it could be that the date in the summary is in  
24 error, in which case I wanted to give you an opportunity to  
25 correct it if necessary.

26 **MR. PETER SLOLY:** I'm not suggesting it's in  
27 error. I just recall having discussions with people in my  
28 organization about the staffing numbers immediately after the

1 Board meeting where I'd been given that instruction from the  
2 Board Chair.

3 I wouldn't have waited until the next day to  
4 start having people engage in the exercise of -- the planning  
5 exercise around getting that number.

6 **MR. FRANK AU:** A moment's indulgence.

7 **(SHORT PAUSE)**

8 **MR. FRANK AU:** Okay. Now, this number, the 1,800  
9 number, was publicly announced at some point, was it not?

10 **MR. PETER SLOLY:** I believe, yes, it was, sir.

11 **MR. FRANK AU:** Do you remember the date or should  
12 we go by the summary?

13 **MR. PETER SLOLY:** Well, it looks like there was -  
14 - it was announced at an emergency Council meeting, I believe.

15 **MR. FRANK AU:** Right. So if we go to page 32 of  
16 the summary.

17 "Chief Sloly publicly announced the  
18 request for 1,800 police resources  
19 during a special City Council meeting on  
20 February 7."

21 Is that what you remember?

22 **MR. PETER SLOLY:** Yes, sir.

23 **MR. FRANK AU:** This was not his normal course of  
24 action, but the Freedom Convoy was unprecedented. Specifically,  
25 Ms. Deans asked Chief Sloly in a public OPSB -- that's Ottawa  
26 Police Services Board -- "meeting to provide a detailed report  
27 on the level of resources required."

28 Could you explain the circumstances in which you

1 made the public announcement?

2 **MR. PETER SLOLY:** Yes. So it definitely was not  
3 the normal process.

4 There were a series of communications from the  
5 end of the Board meeting on the 5th through the 6th into the 7th  
6 as to what role the Board and the City could play in supporting  
7 the Police Service to get the needed resources. The substantive  
8 outflow of all of that was a desire by the Chair and the Mayor -  
9 - they arrived at that through some level of discourse to have a  
10 joint letter to the other two levels of government to seek their  
11 direct support in securing those resources.

12 **MR. FRANK AU:** Now, in the ordinary course, would  
13 it be the practice for the request to go from Chief to Chief?  
14 From one police service to another and not through these  
15 political channels?

16 **MR. PETER SLOLY:** In the ordinary course, yes.

17 **MR. FRANK AU:** And was that not sufficient in  
18 these circumstances?

19 **MR. PETER SLOLY:** These were extraordinary  
20 circumstances, and so -- and there was an increasing and  
21 significant desire, would be the -- I think not quite the right  
22 word -- for the Board to be seen as actively supporting the  
23 service in one of its few ways that they can, which is securing  
24 resources for adequate and effective policing.

25 Again for context, the start of the February 5th  
26 Board meeting, the Chief -- sorry, the Chair in her opening  
27 comments talked extensively about whether or not circumstances  
28 in Ottawa would allow the Ottawa Police Service to be able to

1 provide adequate and effective policing. The transition from  
2 her opening statements to me was a question directly to me,  
3 "Chief" -- I'm not quoting exactly, but as close as I can --  
4 "Chief, do you have the resources necessary, the ability to  
5 provide adequate and effective policing in the city?".

6                   And then there was a substantive period of that  
7 Board meeting spent on that topic.

8                   The sum total of that was the request, the direct  
9 request from the Chair, for the list of resources that we would  
10 need.

11                   This is not ordinary, but I do believe it falls  
12 somewhere within the realm of the *Police Services Act* for the  
13 Board to make sure that we had the resources necessary to  
14 provide adequate and effective policing. And I believe this is  
15 one of the ways in which, again, Chair Deans may -- former Chair  
16 Deans may choose to frame it differently, but I interpret it as  
17 a genuine effort to exercise some level of their mandate to  
18 support getting those resources.

19                   There was then the additional layer of whether  
20 the Chair would sign this alone or the Mayor would join in  
21 signing. I wasn't very much involved in that, so I can't really  
22 speak to it.

23                   **MR. FRANK AU:** Now, there are those who are  
24 concerned about the public announcement of this large a number  
25 of request. For example, there are -- there may be legitimate  
26 concerns that this announcement exposed the OPS's vulnerability  
27 to the convoy participants.

28                   **MR. PETER SLOLY:** I presume someone could come to

1 that conclusion on their own. I'm not sure why it would be so  
2 enlightening because I think almost every public statement that  
3 I made after January 29th, I talked about how desperately we  
4 needed resources and how we were seeking resources and asking  
5 for resources.

6 I think in the middle of the February 5th Board  
7 meeting, the topic of resources came up and, in fact, in the  
8 middle of that Board meeting, I received a communication from  
9 the RCMP saying that 250 officers were arriving and I literally  
10 made that announcement on the Board meeting.

11 So nobody should have been surprised, I think  
12 reasonably surprised, on the 7th that we were significantly in  
13 need of resources and that we were going to be asking for a lot  
14 of resources.

15 **MR. FRANK AU:** And to those who hold the view  
16 that this announcement was made outside the proper channels and  
17 invited inappropriate political influence into the intra-police  
18 resourcing discussions, what do you have to say in addition to  
19 what you've already said about the context of these?

20 **MR. PETER SLOLY:** Thank you.

21 Again, listen, I think there would be as many  
22 opinions in this room or all the rooms across Canada on any one  
23 of the aspects that took place here, so I'm not in any way going  
24 to try to suggest that no one should ever hold that opinion,  
25 including another police leader.

26 But I suspect they would have the same problem  
27 about previous political announcements around staffing numbers  
28 that took place the week before.



1           **MR. FRANK AU:** Now, another criticism that could  
2 be leveled against this public announcement is, especially in  
3 light of what we've heard from other police administrators about  
4 the lack of an adequate plan at the time this announcement was  
5 made, was it really appropriate to make this kind of public  
6 announcement when OPS didn't seem to have the kind of plan  
7 sufficient to deploy this large number of resources even if it  
8 were given them?

9           **MR. PETER SLOLY:** Again, I can appreciate  
10 concerns raised certainly throughout this process and in  
11 discourses well beyond these walls.

12           This is -- this, again, is not an -- not a  
13 practice that I've experienced in my policing career where there  
14 would be a requirement for detailed completed plans submitted  
15 and then analyzed prior to any substantive release of resources.  
16 It wasn't -- it wasn't in my experience around planned events  
17 like the G8-G20, and it certainly wasn't my experience in  
18 unplanned or highly fluid and contentious events like the one  
19 that we experienced here. If this had become a new standard and  
20 a new expectation in policing, I was not aware of it, and I had,  
21 at that point, been a Chief of Police for over two years.  
22 Secondly, we did have a plan. It was an ongoing, evolving plan.  
23 I would by no stretch of imagination suggest to anyone, the  
24 Commissioner or anyone else, that it was an excellent plan. It  
25 was a robust plan, given that we were still pivoting from what  
26 we'd experienced just a week before. Canada was still trying to  
27 figure out what was going on across the country, just as we were  
28 trying to figure out exactly what was going on in the city. And

1 we had been literally using every resource possible, just to get  
2 through hour by hour, day-by-day operations and the planning for  
3 those operations. There was no additional capacity to be able  
4 to produce such a level of standard plan while we so desperately  
5 needed those resources. I think, unfortunately, it became a  
6 misinformed issue around an unrealistic expectation, and,  
7 unfortunately, that caused a lot of concern across the board,  
8 inside our organization, and clearly outside of our  
9 organization.

10 **MR. FRANK AU:** Now this Commission has heard  
11 evidence from both Superintendent Bernier of the OPS and  
12 Superintendent Abrams from the OPP that officers from the OPP  
13 already in Ottawa were not receiving adequate instructions for  
14 them to be properly integrated or deployed in Ottawa. If there  
15 were officers in Ottawa who were not being effectively used,  
16 then one may ask, what's the point of sending more?

17 **MR. PETER SLOLY:** Well, from what I've heard and  
18 what I've seen and what I knew at the time, yes, there were  
19 occasions where officers were not optimally deployed. And I  
20 tell you, I have never been involved in any police operation  
21 where we have brought in resources from across our own city or  
22 brought in resources from outside of our city in two police  
23 services, including my time in Kosovo, where there was  
24 suboptimal deployment and utilization of resources. What tends  
25 to happen is the Incident Commander almost exclusively will be  
26 from the police of jurisdiction, who will utilize the resources  
27 that they know best and use the most frequently, and then go and  
28 tap into the other resources. Inevitably, that means that the

1 external resources will be underutilized. It is in no way  
2 surprising for me to have heard that at points during the entire  
3 three weeks that I was involved in this, that there might have  
4 been officers from some police department that didn't get their  
5 briefing at the right time and may have even spent the better  
6 part of the day not doing the things that they thought they were  
7 going to be doing. I'd experienced that many, many times  
8 myself.

9 **MR. FRANK AU:** Now the last criticism that could  
10 have been made, that I can think of, and that we've heard from  
11 some witnesses, is that between the 3<sup>rd</sup> and the 10<sup>th</sup> of February,  
12 the OPS was using RCMP and OPP officers simply to relieve OPS  
13 officers who were exhausted and not as part of a plan to end the  
14 occupation. What do you have to say to that?

15 **MR. PETER SLOLY:** That's probably very true, sir.  
16 Our officers were exhausted, frozen right through. They needed  
17 relief and there was no other place to get relief from. And  
18 that's part of the reason why the very first request on the 31<sup>st</sup>  
19 of January that Trish Ferguson announces to the RCMP  
20 Commissioner and the OPP Commissioner is to send us some general  
21 duty officers. Our people are asleep on their feet, or they're  
22 frozen to their post. I'm not surprised. That is not an  
23 optimal situation, but that's the reality of what was going on.

24 **MR. FRANK AU:** Okay. Now I'd like to take you to  
25 a new topic. We've been talking about your request for  
26 resources. But before we leave that topic, actually, now that  
27 it's clear to you as of the 6<sup>th</sup> or the 7<sup>th</sup> that Ottawa would need  
28 at least 1800 officers in order to effectively resolve the

1 convoy events, why is it still not a good time to resort to  
2 Sections 9(6) of the *Police Services Act*?

3           **MR. PETER SLOLY:** Yeah. Thank you and I  
4 appreciate the opportunity to have a second go round on this.  
5 The concept of a measured approach I think that's been talked  
6 about usually in terms of PLT and secondarily in terms of use of  
7 force, a measured approach is we need more resources. Let's ask  
8 for it. We need help with the planning for those resources.  
9 Let's get that. We might need to integrate our operations to a  
10 greater degree than we have every considered before. Let's work  
11 on that. Okay. So we've got -- we're getting more resources.  
12 We are stepping up integration. Our planning now is getting to  
13 a much greater level of efficacy. Now we're going to consider a  
14 unified command. That is a measured approach of stepping up.

15           I think it would be irresponsible, as I said  
16 before, and I'm sticking to that, I think it would be  
17 unprofessional and unwarranted to go from, wow, we just had a  
18 really bad weekend, let's get the OPP to come and police our  
19 jurisdiction to we just had a really bad weekend. Let's figure  
20 out how we need to get better and start to use everything we  
21 possibly can, and let's be as clear as we can but as quick as we  
22 can in requesting the things that we can reasonably anticipate  
23 we'll need in the short, medium and long term. Let's be very  
24 open to, as we have always been in Ottawa, even during my time,  
25 to integration. Nothing was off the table. I think I probably  
26 said that statement 453 times. Everything's on the table,  
27 including greater integration, and including unification. And  
28 ultimately, through greater integration, ultimate unification,

1 and some 2200 officers, the Ottawa Police Service as police of  
2 jurisdiction, and the amazing supports we received from across  
3 the country were able to safely and successfully end the events  
4 here in Ottawa.

5 **MR. FRANK AU:** Perhaps this raises a more general  
6 question of how should we deal with multi-jurisdictional event  
7 that requires external support? You've mentioned that Ottawa is  
8 the police of jurisdiction, but the reality is that you're  
9 asking these external agencies, the OPP or RCMP, to supply  
10 tremendous resources that, at the time, Ottawa did not seem  
11 capable of effectively deploying. You've acknowledged that  
12 there were issues with officers already present, but for  
13 different reasons.

14 **MR. PETER SLOLY:** Just on that point, I just want  
15 to be clear, and I think it was -- I understand somebody  
16 clarified this before. There were instances where clearly that  
17 was happening. I believe Superintendent Abrams was the direct  
18 conduit to Deputy Chief Bell, organization to organization. He  
19 raised it. I believe it was received well and it was actioned.  
20 I don't recall that being a continuous problem or a problem of  
21 scale. I will not deny that it happened sporadically, and  
22 particularly in the early parts, but it's my understanding it  
23 wasn't daily occurrence on scale where hundreds of officers were  
24 sitting around being unutilized or underutilized. I just want  
25 to make that clear for the public record.

26 **MR. FRANK AU:** Yeah.

27 **MR. PETER SLOLY:** And again, that level of  
28 underutilization is something that I've experienced in my entire

1 three decades in policing. That was not a unique situation to  
2 the events here in Ottawa.

3 **MR. FRANK AU:** I do not wish to exaggerate the  
4 problem in Ottawa, but surely, you won't deny that OPS was  
5 struggling. That's what we've heard from the ---

6 **MR. PETER SLOLY:** I think I've ---

7 **MR. FRANK AU:** --- all of the other witnesses.

8 **MR. PETER SLOLY:** --- I think I've said that  
9 repeatedly myself, sir.

10 **MR. FRANK AU:** And OPS was struggling on many  
11 different levels. It needed to develop a plan, but it was  
12 struggling to the point where it was finding it difficult to  
13 have the expert planners to make that plan. Is that fair to  
14 say?

15 **MR. PETER SLOLY:** Yes.

16 **MR. FRANK AU:** And the OPS officers were tired,  
17 exhausted. They needed external agency's help just to maintain  
18 a regular level of policing. That's the reality at the time ---

19 **MR. PETER SLOLY:** We needed external police  
20 agency's help primarily for the Incident Command System to  
21 address the crisis happening in the downtown core. We needed  
22 less help for the policing of the rest of the city.

23 **MR. FRANK AU:** And ---

24 **MR. PETER SLOLY:** We still needed help there, but  
25 we were nowhere near by comparison.

26 **MR. FRANK AU:** So, again, I think my question is,  
27 wouldn't it be very simple to let a bigger organization like the  
28 OPP or RCMP to be -- to have a greater capacity to help? They

1 wanted to help.

2           **MR. PETER SLOLY:** I'm not sure they wanted what  
3 you're suggesting Section 9. I never received any suggestion  
4 from Commissioners Carrique or Lucki that they wanted to come in  
5 here and bring the necessary lift of 2,000 plus officers, and  
6 have them on the ground here for days, if not weeks on end. I  
7 stand to be corrected if there's information out there that's  
8 different from that. Here's the challenge. Then you're going  
9 to have to get three levels of government to invest differently  
10 in three levels of policing. I don't know how the formula would  
11 work, but if we're to go down the what if scenario that you're  
12 asking me to entertain, and please, if the Commissioner doesn't  
13 have time for this or you want to move on, just let me know.

14           But here's scenario number one: Take a  
15 percentage of every municipal police service, just say  
16 10 percent, fold that up into the OPP because every single year  
17 some event is going to come to some municipal police service  
18 where they don't have enough resources, so automatically the OPP  
19 will get 10 percent cut of every police service because when,  
20 not if, they will be required under the new components of  
21 section 9 to come and take over policing for a day, a week, a  
22 month, they have the lift to be able to do that. I don't think  
23 any mayor or any regional authority is going to go for that, and  
24 I don't even think the Province would want that responsibility.

25           Now, just layer in that on top of the RCMP. With  
26 how stretched they are with contract policing, national policing  
27 Indigenous policing, force protection internationally, there's  
28 probably eight functions that not one of them are staff

1 adequately. Now are you going to take a 10-percent cut from the  
2 Provincial Police Services to allow the RCMP to do that?

3 And now you come to the National Capital Region,  
4 where there are six police services operating in here at any  
5 given day. How do you divide the pie there? I understand the  
6 intellectual desire to explore that. The practical and  
7 financial side I'm sure merits the effort.

8 I think what we need to do is get standards  
9 across the board, really clarify how and when we work together  
10 in integrated and/or unified, clarify the gaps between the  
11 Strategic, Operational, and Tactical, and how that fits into  
12 police of jurisdiction adequate and effective. That's going to  
13 be a lot cheaper and probably a lot faster, and it can be  
14 iterated over the course of time for lessons learned from  
15 experience to experience.

16 You're talking about a major structural change,  
17 legislative change that would take years to hammer out and then  
18 years to get to a point of efficacy.

19 **MR. FRANK AU:** M'hm. Well, let's go back to what  
20 happened on or around the time that Chief Pardy led his group,  
21 the Integrated Planning Group, to Ottawa. He arrived on the  
22 8th, and he had a meeting with your Command Team on both the 8th  
23 and the 9th.

24 I want to get your best recollection of the  
25 meeting you had with them in the afternoon on the 9th.

26 **MR. PETER SLOLY:** Okay. Well, I think it was  
27 around 12 o'clock. Again, for context, if I get the dates  
28 wrong, I believe somewhere around the 6th or the 7th there was a



1 communication between myself and Commissioner Carrique, where we  
2 had talked about a significant increase in integration. I  
3 forget who raised it, whether he did or I did, but we were very  
4 quickly in agreement that that would be very helpful and that we  
5 would need then to bring in folks from -- senior folks that had  
6 experience and expertise and that type of thing. He referenced  
7 Carson Pardy almost immediately. That name, I believe, came up  
8 in our first conversation, and I welcomed him and anybody else  
9 that he could send to support that.

10                   And to his word, I think within 24 hours we were  
11 contacted, 24 hours after that there was an initial meeting out  
12 at the RCMP Headquarters. That was a meeting, unfortunately --  
13 I realise I'm going really fast, so I'm slowing myself down now.  
14 That was the meeting, unfortunately, that because of the  
15 distance to travel to and the Teams meetings problems that we  
16 had, Acting Deputy Chief Ferguson was only able to get a portion  
17 of her Incident Command staff on there. While there was  
18 somewhat of a productive discussion, it didn't get to the level  
19 where there was any substantive move forward.

20                   There was an agreement to have another meeting on  
21 the 9th of February, is that right, the 9th of February, and  
22 there was additional efforts during that period to continue to  
23 improve and evolve that plan. A substantive lift that day. I  
24 referenced earlier on that I got involved in that lift to try to  
25 elevate the plan to as great a degree as we possibly could for  
26 these partner agencies coming in.

27                   I believe around 12:00, 12:30, Chief  
28 Superintendent Pardy, Superintendent Abrams, RCMP

1 Superintendent Lue, and I forget, there were other members, but  
2 those were the three primary members of the team, arrived at our  
3 headquarters.

4 Take a pause there. But that was the context to  
5 the start of that meeting. I had my Command Team and my  
6 Incident Command Team there as well.

7 **MR. FRANK AU:** So I'm glad you paused there  
8 because before we get to the actual meeting with the Integrated  
9 Planning Group, do I understand correctly that that morning, the  
10 morning of the 9th, you had another meeting with your -- the OPS  
11 Command Team.

12 **MR. PETER SLOLY:** M'hm.

13 **MR. FRANK AU:** Can you tell us more about that  
14 meeting first?

15 **MR. PETER SLOLY:** Yeah. And we debriefed from  
16 what happened the previous night, looked to see where we could  
17 again continue to evolve the plan in advance of this next  
18 meeting, and put every effort into that so that again we could  
19 have the best product available.

20 It was clear to me that this -- the arrival of  
21 this team was not only to support what we're -- the ongoing  
22 efforts here, but they needed to assess where we were with our  
23 ongoing efforts here, specifically, assess the plan.

24 **MR. FRANK AU:** Now, let me take you to some  
25 notes. These are notes written by Deputy Chief Ferguson, I  
26 believe.

27 OPS00014479.

28 And I want to take you to page 66. So you see

1 from the top there that is Wednesday, February the 9th.

2 If we go to...

3 What time did you say the meeting was? I don't  
4 remember.

5 **MR. PETER SLOLY:** I see a note here 7:10. I  
6 don't know if that's accurate, but that would seem about right.  
7 It was relatively early in the morning.

8 **MR. FRANK AU:** So this is the day after the group  
9 arrived, and your attendance was delayed the day before, and  
10 then the next morning we have this meeting.

11 Do you remember Mission Hydra?

12 **MR. PETER SLOLY:** Yes, sir.

13 **MR. FRANK AU:** Tell us about the name?

14 **MR. PETER SLOLY:** Ancient Greek civilisation, an  
15 old myth about a multi-headed monster. When you cut off one  
16 head it would grow back.

17 **MR. FRANK AU:** And was there a reason why it's --  
18 this is called Mission Hydra?

19 **MR. PETER SLOLY:** Bit of creative license on my  
20 part, but the idea was we were struggling to take a section of  
21 the red zone or Confederation Park and then hold it while we  
22 continued on. And so that was a constant challenge as our  
23 officers made efforts to secure portions of the theatre,  
24 particularly in and around the red zone, that the challenge was  
25 as much to take the portion and then to hold the portion.

26 The concept of the Hydra, if you can cut off the  
27 head and cauterise it, it can't grow back. If you can take a  
28 piece of ground and hold it, people can't come back. We can

1 then focus on a smaller theatre with more resources, smaller  
2 theatre more resources, smaller theatre more resources. That's  
3 the concept behind the ---

4 **MR. FRANK AU:** Right. Now, I understand from the  
5 testimony of Deputy Chief Ferguson that the day before, on the  
6 8th, when your Command Team met with the Integrated Planning  
7 Group, she presented a Strategic Concept of Operations Plan with  
8 eight points with a mission statement that included elements of  
9 engagement by the PLT and so on. And part of the discussion at  
10 this morning meeting, on the 9th, is a new version with a  
11 different mission statement, and there's a reference here that  
12 this was a "very aggressive posture":

13 "...language throughout the whole  
14 briefing & mission statement..."

15 I'm not sure of that next word:

16 "Asked if anyone needed clarification.  
17 Chief laid out his plan, omitted  
18 negotiation and when I brought it up he  
19 reacted angrily saying 'we are not  
20 negotiating', then said 'it's  
21 implicit'. I advised..."

22 Is it "all CIC mission statements are":

23 "...our mission statements always has  
24 explicitly stated in the mission  
25 statement."

26 And then the next comment I believe is attributed  
27 to you:

28 "If it doesn't reduce the size of the

1 footprint that is not a good  
2 negotiation."

3 Do you remember this exchange?

4 **MR. PETER SLOLY:** These are Acting Deputy  
5 Chief Ferguson's recollection of that. I would not in any way  
6 characterise what took place in that meeting to reflect what I'm  
7 interpreting and language here. So again, without the chance to  
8 hear these concerns and understand... We had a very healthy  
9 discussion, yes, around whether the term "negotiation" should be  
10 explicit in I believe the mission statement, but other than  
11 that, I'm not really sure as to why she has interpreted things  
12 the way that she has chosen to do so.

13 **MR. FRANK AU:** So let's hear it from your  
14 perspective. You've told us about this as well, I believe,  
15 during our interviews. If I could take you to your interview  
16 summary at page 36.

17 So if we go to the section under Discussions:  
18 "Chief Sloly recalled that on February  
19 [the 9th] he held a special meeting  
20 with Deputy Chief Bell, Acting Deputy  
21 Chief Ferguson, OPS general counsel  
22 Christiane Huneault, CAO Dunker, and  
23 Insp. Kevin Maloney. This meeting took  
24 place after an internal OPS planning  
25 meeting but before the February 9 12:10  
26 p.m. meeting with Chief Superintendent  
27 Pardy and Superintendent Lue. His  
28 intent was to emphasize that the entire

1 command team was signed off on the  
2 February 9 plan. At the meeting, he  
3 stated that he would 'crush' anyone who  
4 undermined the plan - Chief Sloly  
5 recognizes that it was an unfortunate  
6 choice of words but public safety,  
7 member health, wellness and safety, and  
8 the successful conclusion of the local  
9 Convoy event were all at a critical  
10 juncture and this required absolute  
11 command commitment to supporting the  
12 implementation of the updated plan. He  
13 restated the need for unity within the  
14 command to support the updated plan  
15 including the level of integration and  
16 the acquisition of the needed resources  
17 to safely and successfully end the  
18 events in Ottawa. There were to be no  
19 major changes to the plan, the concept  
20 of operations, the elevated integration  
21 and the senior ICS assignments without  
22 discussion about the need for such a  
23 change."

24 Does this reflect your recollection of what  
25 happened?

26 **MR. PETER SLOLY:** Yes, sir; it's my statement.

27 **MR. FRANK AU:** So there appears to be an emphasis  
28 of committing to this plan, unless there was -- there were

1 significant changes that would have justified a different  
2 course.

3 Why this emphasis?

4 **MR. PETER SLOLY:** We had had the challenge of the  
5 previous week where senior people were swapped out without any  
6 communication; where we had delays around the development of a  
7 significant portion of the plan, that being the Public Order  
8 Plan. This was a reminder to folks about the problems that we  
9 incurred -- we encountered last week.

10 We are now bringing in a significant amount of  
11 resources, a significant level of integration, and we simply  
12 cannot have a individual make a change that could affect the  
13 strategic intent of what we were trying to accomplish at this  
14 point.

15 We needed to have -- on the positive side, we  
16 needed to have a full commitment across the command team that we  
17 had reached a position now that could move forward with. There  
18 was still going to be evolutions of the plan and subplans and as  
19 resources became available, but that the base of the week and  
20 change of pivoting from where we were into this new position,  
21 particularly with the request of resources and integration, this  
22 required a very firm and full commitment from the command team  
23 going forward.

24 **MR. FRANK AU:** Now, you acknowledged that the  
25 word choice "Crush" was unfortunate?

26 **MR. PETER SLOLY:** Absolutely, sir.

27 **MR. FRANK AU:** But you meant to convey an  
28 emphasis that no-one should deviate from the plan lightly.

1                   **MR. PETER SLOLY:** Lightly, at the strategic  
2 level, no major changes in the plan; no major changes in the  
3 concept of operations, the elevated integration with RCMP and  
4 OPP, and the senior ICS assignments -- Major Incident Commander,  
5 Event Commander, Incident Commander -- without discussion first.  
6 Probably the only thing I forgot to add in there, unless there  
7 were exigent circumstances. Again, obviously -- I shouldn't say  
8 obviously. Exigent circumstances is always implicit in any one  
9 of these circumstances.

10                   **MR. FRANK AU:** Is this consistent with the  
11 Incident Command system where the Operational Level Commander  
12 required a certain degree to adapt and to respond to quickly  
13 changing circumstances?

14                   **MR. PETER SLOLY:** That's the concept of exigent  
15 circumstances, sir. That would not fit within what I was  
16 relaying to these folks here.

17                   **MR. FRANK AU:** So would your colleagues have some  
18 away from this meeting understanding that if there were to be  
19 changes, that it would require some kind of an approval from the  
20 Chief?

21                   **MR. PETER SLOLY:** Not at all, sir. At the  
22 operation level, no. Again, I'm very clear: No major changes  
23 to the plan. No major changes to the concept of operations, not  
24 objectives, not subplans, not operational decisions made during  
25 the course of the day. The elevated integration, I wasn't going  
26 to have a Superintendent, an Inspector, a Staff Sergeant or a  
27 Deputy Chief tell the OPP and the RCMP, "You know what? We  
28 don't need that integration, never mind what Sloly says."





1 to validate, approve or not approve, every single aspect of any  
2 potential change to the plan. It would just be impossible. I  
3 would never have said that. And I can see any experienced  
4 person in that room taking such a literal interpretation and  
5 walking out, particularly after being in this theatre for almost  
6 a week and a half.

7 And if they had that interpretation, with the  
8 maturity and the rank in that room, I would have expected them  
9 to raise clarification.

10 **MR. FRANK AU:** Now, it was at this meeting as  
11 well that we've heard from other witnesses that you discussed  
12 politics. If I could take you to page -- maybe later on in this  
13 page, actually, or maybe the next page; I'm not sure.

14 Go down a little more. Do you see the comment  
15 from Trish:

16 "I want us to limit politics!"

17 **MR. PETER SLOLY:** Yes, sir.

18 **MR. FRANK AU:** And the comment just before that I  
19 suppose was attributed to you, "Tom C."; Tom Carrique, probably?

20 **MR. PETER SLOLY:** M'hm.

21 **MR. FRANK AU:** "...is assessing if we are worthy  
22 of getting the additional ask  
23 resources"

24 **MR. PETER SLOLY:** Yes.

25 **MR. FRANK AU:** What is your recollection of the  
26 discussion?

27 **MR. PETER SLOLY:** Just that. It was made clear  
28 to them that the folks that have arrived here have come with

1 clear instructions from their Command to assess the level of our  
2 planning, the adequacy of the resource requests that we made,  
3 and then to -- assuming that we could come to that arrangement  
4 of integration, to then move forward on building that out. But  
5 they were coming to assess where we were.

6 **MR. FRANK AU:** Now -- so there was a reference to  
7 Deputy Chief Ferguson asking to limit the discussion of  
8 politics. Her own notes -- now, these are notes taken by the  
9 Legal Services. Her own notes are more explicit.

10 If we could go to OPS00014479, at page 67? Go  
11 down.

12 Okay. "Talked about the plan..." So keep going.  
13 See the dash? "Talked about the plan..." I'm not sure.  
14 "Talked about the plan for..."

15 **COMMISSIONER ROULEAU:** "Briefing"?

16 **MR. FRANK AU:** "...briefing the embedded cell of  
17 planners & commanders and he spoke of a  
18 type of conspiracy that is happening at  
19 Provincial & Federal levels and this  
20 team is being handled by their  
21 political masters and promoted the idea  
22 that they are not really here to help."

23 Can you help us understand who are these  
24 political masters and what was the conspiracy theory?

25 **MR. PETER SLOLY:** Yeah, first of all, these are  
26 Trish's -- Acting Deputy Chief Ferguson's words. I won't  
27 challenge her emotions or interpretation around it but they're  
28 not the conversation that I was leading at this point.

1           I had a very clear discussion about two elements.  
2 We are going to be assessed on our quality of our planning and  
3 the relevance to the resource requests and if we cannot provide  
4 enough substantive justification for what we're looking for,  
5 we're likely not going to get the level of help that we need.  
6 Secondly, I did talk about the politics that are happening in  
7 and around this entire event. By this time, it is a national  
8 event with global coverage.

9           By this time, I had had several interactions with  
10 all three levels of government and the board. It was clear to  
11 me that there was increasing intense and, in some cases, I  
12 believe, undeserved and unhelpful political pressures happening  
13 to the Ottawa Police Service, pressures that could affect our  
14 ability to secure the resources. So I was letting them be  
15 aware, giving them situational awareness and allowing a  
16 conversation to happen in a very tight room with my command team  
17 so they could have as much understanding before they went in  
18 front of the group of external agencies to have that  
19 conversation. I didn't want there to be any surprises and I  
20 wanted them to be as fully informed as possible.

21           An example would be the day before this there was  
22 a public motion put forward by a significant number of city  
23 councillors asking for the Ottawa Police Service to remove the  
24 police's jurisdiction for the purposes of the incident command.  
25 So these were very live, real-time issues. There were others  
26 that they were less aware of. So I tried to give them  
27 indications as to what was going on without going delving down  
28 into unfortunate details of it.

1           It's in that context that I think Acting Deputy  
2 Chief Ferguson may have thought it was a conspiracy theory.  
3 These were very real experiences that I was aware of and I was  
4 trying to bring my command team to a level of awareness so they  
5 could appreciate the challenges that we would have to show a  
6 unified approach around this going forward. And if we didn't  
7 have a unified approach, the type of politics could very quickly  
8 divide and conquer us.

9           **MR. FRANK AU:** Were you concerned that these  
10 officers coming from the OPP or RCMP may not come with a pure  
11 motive to help but rather were acting on behalf of whoever was  
12 sending them or other politically-related reasons?

13           **MR. PETER SLOLY:** If you're asking whether Chief  
14 Pardy -- Chief Supt. Pardy and Supt. Lue were there for  
15 political reasons, no. I think they were genuinely assigned and  
16 they came with genuine hearts to offer the help that they could  
17 to understand what was going on and offer the help they could.  
18 But I'm very much aware of the politics that comes to play on  
19 the heads of chiefs of police and commissioners. And I'm very  
20 much aware of a number of issues that my colleagues at that rank  
21 were facing.

22           **MR. FRANK AU:** Now, you were the one who was  
23 asking for help. And when they came, were you -- did you have  
24 any -- was there any reluctance on your part to share the  
25 information within the OPS in order to help them help you?

26           **MR. PETER SLOLY:** None so ever, sir.

27           **MR. FRANK AU:** Did you have any issues of trust  
28 in relation to working with them cooperatively to resolve the

1 situation in Ottawa?

2                   **MR. PETER SLOLY:** Trust, no, but I was very  
3 explicit on two points. Integration means that the Ottawa  
4 Police Service remains police of jurisdiction, and that the  
5 Ottawa Police Service remains in control of the incident command  
6 system, and that the resources I'm asking for are to be under  
7 the control of the incident command system. Those were the only  
8 three caveats. If they couldn't agree to those three caveats,  
9 we'd probably have to go back to the drawing board in some other  
10 way to get the resources and achieve another type of  
11 integration. Those were the three caveats. It's not a matter  
12 of trust. It's simply a matter of the baseline aspects, the  
13 redline aspects of our ability to move forward under and  
14 integrated model.

15                   **MR. FRANK AU:** Your command team has told us that  
16 they perceived an issue on your part of not willing to let go of  
17 control to -- a concern to hold onto -- by way of this "police  
18 of jurisdiction" concept, to hold onto some kind of control; do  
19 you agree with that?

20                   **MR. PETER SLOLY:** Not at all.

21                   **MR. FRANK AU:** Do you know what they're talking  
22 about?

23                   **MR. PETER SLOLY:** No, I don't, sir.

24                   **MR. FRANK AU:** What was it that was so important  
25 -- why is it so important to you that Ottawa remain the police  
26 of jurisdiction; what's the significance of that? What does  
27 that mean?

28                   **MR. PETER SLOLY:** It's in the *Police Services*

1 Act, sir. We are the police of jurisdiction.

2 **MR. FRANK AU:** But don't different police  
3 services often work cooperatively to figure out how to solve a  
4 problem? Isn't that what ---

5 **MR. PETER SLOLY:** And we did that every single  
6 day of my day in -- of my time in office -- joint forces  
7 operations. I invited in the RCMP to do internal criminal  
8 conduct investigations. We did that every single day. That is  
9 a very, very different thing from we are no longer the police of  
10 jurisdiction in the Nation's Capital for a million people. The  
11 Ottawa Police Service will no longer be the police service even  
12 though we've been so for a century and change. That is a very  
13 different concept of operations.

14 **MR. FRANK AU:** But if it makes sense for, like, a  
15 major case investigation for -- let's say a crime is committed  
16 in Toronto but the expertise required to successfully solve the  
17 case necessitates a combination of expertise from Toronto  
18 Police, Peel Police, and York Regional Police, isn't there some  
19 protocol that the lead would not necessarily be the police of  
20 jurisdiction? It would depend on the circumstances what makes  
21 the most sense?

22 **MR. PETER SLOLY:** I can think of examples where  
23 yes, a investigator would come out. The lead investigator in  
24 the criminal conduct investigation was from the RCMP but  
25 professional standards were still under my control as the police  
26 chief in the police of jurisdiction. The decision to lay  
27 charges or not lay charges from the Police Act were still under  
28 Part IV from me as a chief of police. But if I'd abdicated that

1 role and responsibility, then it would be up to the RCMP lead  
2 investigator to decide on the totality of the circumstances  
3 around that case. So yes, hundreds of times, probably thousands  
4 of time I've integrated police services for a wide variety of  
5 things -- administrative, HR, human rights, operations, Guns and  
6 Gangs. I have no trouble whatsoever with that concept.

7 In my time in policing -- got to be careful here.  
8 I can't think of a single time in my 30 years in policing where  
9 a police service said, "We're done. Somebody else come do this  
10 for us." I stand to be corrected but I can't recall a single of  
11 that happening.

12 **MR. FRANK AU:** But why would it be a matter of  
13 someone else doing it for us? Wouldn't it be a true matter of  
14 collaboration? It would still count on the local expertise but  
15 -- maybe this is a question for the policy round discussions. I  
16 don't know.

17 **MR. PETER SLOLY:** Potentially, sir.

18 **MR. FRANK AU:** But in any event, at this meeting  
19 on February the 9<sup>th</sup>, if I take you to the notes, OPS00014454 --  
20 so we're returning to the Legal Services notes, if we go to page  
21 136 and we go down -- so this is still the 9<sup>th</sup>, I believe:

22 "Yesterday provided them the org chart  
23 of command. What more do you need to  
24 implement/build into our plan? Need to  
25 know what resources we will get here in  
26 Ottawa."

27 That was attributed to you. And the OPP  
28 responded:



1 "Strategic decision because of rest of  
2 provinces."

3 Do you remember what this was about?

4 **MR. PETER SLOLY:** Yes, sir.

5 **MR. FRANK AU:** Explain to us, please.

6 **MR. PETER SLOLY:** I think a very healthy  
7 discussion, "Look, we have a local need here but we now have a  
8 national set of events." I think by the 9<sup>th</sup>, Windsor might have  
9 been starting -- kicking up around that time. Toronto had just  
10 got through their Queen's Park piece. I think much of the  
11 Prairie provinces had one or more things going on. Coutts was  
12 still very alive. So yeah, this is a healthy discussion around,  
13 "Look, we know we need a lot of resources but we also know  
14 you've got a lot of other resource demands happening."

15 Around this time, I believe there was a steady,  
16 almost daily call of all chiefs that were facilitated by the OPP  
17 and they had already, I think, established two levels of  
18 resource integration, one on Public Order Units explicitly and  
19 another one on general resource requests. So we were already in  
20 a provincial/national Theatre where we are trading off resource  
21 requests against risks on a scale that I'd never experienced.  
22 And I'm not aware of any police chief from my generation that  
23 says they experienced something similar. So that's the context  
24 of the discussion taking place here.

25 **MR. FRANK AU:** Could we go -- scroll further  
26 down? OPP said "We stated 1,200 OPP staff over" -- it's hard to  
27 read -- sorry, it's actually there at the below quote that I'm  
28 interested in, "Can't build a plan without a plan."

1                   And the chief said, "Fine, build a plan and get  
2 us the people."

3                   **MR. PETER SLOLY:** I know what was taking place  
4 here. I don't think these notes are particularly accurate at  
5 this point, and I suspect there's a lot of back and forth and  
6 people are talking fast, as I am now, and there's a little bit  
7 of catch up time here.

8                   So I will build off these notes, not ---

9                   **MR. FRANK AU:** Yes, but tell us what you  
10 remember.

11                  **MR. PETER SLOLY:** They're not accurate.

12                  So first, there was a discussion. I forget who  
13 raised it -- it might have been Supt. Abrams, but I'm not 100  
14 percent sure -- around how many staff had been sent over, and  
15 again, I said, "Well, there was that miscommunication from the  
16 Solicitor General that that left the impression that 1,500  
17 officers from the OPP or from across the province were here in  
18 Ottawa on a daily basis."

19                  And I again explained the challenges, the public  
20 trust and confidence challenges that that caused us, that then  
21 pivoted out of that discussion into -- again, I don't know who  
22 from the OPP would have led this, but I don't think this is an  
23 accurate statement, but it probably captures the theme -- "Can't  
24 build a plan without a plan." This is the chicken and egg  
25 discussion, should we have a plan in force before you get the  
26 resources?

27                  And I'm saying, "We are planning and we know we  
28 need a level of resources we can find to the plan. I need a

1 commitment of resources."

2                   So that's the gist of the discussions that are  
3 taking place, probably in rapid fire, and the scribe is, in this  
4 case, Christiane Huneault, is doing her best to keep up.

5                   **MR. FRANK AU:** Now, you do recognize these notes  
6 are from the OPS council, Ms. ---

7                   **MR. PETER SLOLY:** Yes, I just referenced  
8 Christiane Huneault.

9                   **MR. FRANK AU:** Because didn't you ask her -- if  
10 we go to page 43 -- so I'm going back in time -- page 43 is her  
11 notes on February the 3rd, as you can see here.

12                   Do you see the bullet where she notated that she  
13 asked, "He asked if I've been taking notes. I told him I'm  
14 acting like a scribe and capturing everything."

15                   So it appears that you've asked her to take  
16 notes, and she's been doing her best to take notes, almost like  
17 a scribe in trying to capture everything. But you don't believe  
18 that these notes are -- or at least the part that we've  
19 referenced?

20                   **MR. PETER SLOLY:** No, sorry if I've left that  
21 impression.

22                   She -- Christiane Huneault is many things  
23 wonderful and an excellent general counsel. She, for a period  
24 of days, offered to and took on this role of being a scribe. We  
25 were just so thin on resources, she offered to do that until she  
26 could free up Vicky, Vicky Nelson, I believe is her name.

27                   I'm not suggesting that the effort on the 9th was  
28 an insufficient effort. That was a very dynamic meeting and

1 there was a lot of points being made, and she was doing her best  
2 to capture them. I'm only saying they're not actual quotes that  
3 I can attribute, and she hasn't attributed the people. So she's  
4 done her best, just not able to say who said what exactly when.

5 **MR. FRANK AU:** M'hm.

6 **MR. PETER SLOLY:** The notes that she provided  
7 were incredibly helpful for me.

8 **MR. FRANK AU:** Now, in the interest of time, I  
9 think I'm going to skip ahead, but the last point I need -- I do  
10 want to put to you because in fairness to you, Chief Parady, in  
11 his will-say, has said that the tone, the overall tone of this  
12 meeting was somewhat unprofessional and disrespectful.

13 "Chief Sloly was very clearly under  
14 tremendous pressure to act and was very  
15 suspicious of levels of commitment from  
16 police agencies. He went as far as to  
17 advise us that he had sources in the  
18 Ministry office that his requests were  
19 not being supported, and essentially,  
20 they wanted him to fail. There was  
21 disagreement on this point from our  
22 team."

23 I just want to give you the opportunity to  
24 respond to those comments.

25 **MR. PETER SLOLY:** All of them, sir?

26 **MR. FRANK AU:** You can -- if -- would it help if  
27 I ---

28 **MR. PETER SLOLY:** I don't -- put it up, I just --

1 -

2 **MR. FRANK AU:** Yes.

3 **MR. PETER SLOLY:** --- can't -- there was lot of  
4 things you just said there, so.

5 **MR. FRANK AU:** Of course.

6 **MR. PETER SLOLY:** Thank you.

7 **MR. FRANK AU:** Let's go to OPP00000792, and if we  
8 can go to page 4, please?

9 So do you see the bullet that starts with, "The  
10 overall tone"?

11 **MR. PETER SLOLY:** Yeah. It was a tense meeting  
12 at times. We certainly got into very contentious discussions  
13 like the discussion -- sorry, I'll slow myself down. We got  
14 into contentious discussions like the discussion around the  
15 Solicitor General release of the 1,700 number.

16 I could see if, at during those points, Chief  
17 Supt. Pardy, who I believe was selected appropriately and sent  
18 quickly and came with the view of supporting -- I suspect that  
19 would be the same for Supt. Lue representing the RCMP -- they  
20 were not aware of and had not been involved in these events. I  
21 suspect they weren't even following all the events, and  
22 certainly not the political aspects of it. They were  
23 operational people coming in to provide an operational support.

24 In that context, I could understand why Chief  
25 Supt. Pardy might describe some aspects of it as disrespectful -  
26 - get the right words here ---

27 **MR. FRANK AU:** Well ---

28 **MR. PETER SLOLY:** --- "somewhat unprofessional

1 and disrespectful".

2 I needed to be very clear on behalf of my service  
3 and my city and the state of public safety that we're in that we  
4 needed the resources, that we needed them as quickly as  
5 possible, they needed to be predictable, sustainable resources,  
6 and not, as we had experienced so far, through nobody's fault,  
7 but we can send you this, but if an event comes to us, we got to  
8 pull them back.

9 Without any predictability of resources, I don't  
10 want to get back into the plan first versus the resource request  
11 -- but absent the predictability of resources, planning for  
12 something that you can't resource becomes a waste of time, and  
13 we had no time to waste, and we had no resources to waste.

14 So again, I come back, it's an "and" not an "or".

15 The rest of this, I don't know if you want to go  
16 -- me to go through bullet point by bullet point ---

17 **MR. FRANK AU:** No, that's fine.

18 **MR. PETER SLOLY:** --- and comment?

19 **MR. FRANK AU:** Yes, I -- there are so many things  
20 I would like to get your thoughts on, but we do not have all the  
21 time that we want.

22 **MR. PETER SLOLY:** Suffice it to say we discussed  
23 political -- the political pressure aspects, and that is always  
24 an uncomfortable conversation to have between police services.

25 **MR. FRANK AU:** Right. Now, if I could take you  
26 to a different topic, and this relates to the invocation of the  
27 *Emergencies Act*, I want to ask you, before the 14th of February,  
28 did you ever form the view that additional powers that could be

1 granted under the *Emergencies Act* could help OPS resolve the  
2 convoy events?

3 **MR. PETER SLOLY:** I'm not sure I understand the  
4 question, sorry. I may have just missed it. I apologize.

5 **MR. FRANK AU:** Right. So the *Emergencies Act* was  
6 invoked on the 14th of February?

7 **MR. PETER SLOLY:** That's right.

8 **MR. FRANK AU:** Before that date, did you ever  
9 think about whether the powers under the *Emergencies Act* might  
10 be helpful for the OPS to resolve the convoy events?

11 **MR. PETER SLOLY:** Before that, they'd have never  
12 thought about the *Emergencies Act*. I think I might have been  
13 made aware of it over that weekend.

14 My challenge, literally, up until my last day in  
15 office wasn't additional legislation or injunctions, it was  
16 resources. In fact, there was a period of time where we were  
17 hoping there wouldn't be any injunctions or emergency  
18 declarations because they would give us more powers and we  
19 didn't have any resources to implement those powers, and then we  
20 would be accused again of not doing our jobs or not using powers  
21 available to us.

22 So for a significant portion of my time in  
23 office, discussions around injunctions, discussions around  
24 emergency declarations were maybe that's something that we  
25 actually don't want at this point. I was never consulted  
26 explicitly on the *Emergency Measures Act* that was put into place  
27 on February 14th.

28 **MR. FRANK AU:** M'hm. If I could take you to the

1 OPS document 00014566? It appears that these are notes of a  
2 meeting that occurred on February the 14th at around 10:00 a.m.

3 So if we go to page 2. If we go to the section  
4 under the redaction, do you see a note that,

5 "Lucki did not get prime minister  
6 briefed [...] on the plan. Prime  
7 minister will be enacting [...]  
8 *Emergencies Measures Act.*"

9 And then if we go to the very bottom of the page,  
10 there's a notation that,

11 "CHIEF grateful for every tool we get  
12 in the toolbelt but need the  
13 resources."

14 Do you remember this discussion about ---

15 **MR. PETER SLOLY:** I remember the discussion. I  
16 can't remember word for word, and certainly, that last line  
17 would be basically summarising what I just tried to tell you.

18 **MR. FRANK AU:** M'hm.

19 **MR. PETER SLOLY:** Tools are great. If we don't  
20 have the resources to use them, there could be problems with  
21 that.

22 **MR. FRANK AU:** So was Commissioner Lucki the  
23 first to inform you that the federal government would be  
24 declaring an emergency?

25 **MR. PETER SLOLY:** I don't have an independent  
26 recollection. This appears to be the first time I'm hearing  
27 about it.

28 **MR. FRANK AU:** Okay.



1           **MR. PETER SLOLY:** And it certainly wouldn't have  
2 been anything more than a day before, if there was any other  
3 discussion on it.

4           **MR. FRANK AU:** Now later that day, I understand  
5 that you spoke with Chair Deans about the *Emergencies Act*. Do  
6 you remember that?

7           **MR. PETER SLOLY:** I don't have an independent  
8 recollection. If you could take me to a leading note or ---

9           **MR. FRANK AU:** Yeah, I'll take you to  
10 OPS00014566, at page 6. Sorry, if we go back up a little?  
11 Trying to see. Go -- okay. So the last bullet.

12                                "You have a municipal state of  
13                                emergency, then a provincial and now a  
14                                federal. I have already said that we  
15                                need more than just the OPS."

16           Was that something you said during that meeting?

17           **MR. PETER SLOLY:** That would be in line with the  
18 sort of type of discussions. I can go back to the there may not  
19 be a policing solution to this. This would be in line with that  
20 line of discussion. We have three levels of states of  
21 emergency. This is obviously more than just the OPS.

22           **MR. FRANK AU:** Now you said also in your  
23 interview summary that you participated in several phone calls  
24 with Federal Deputy Minister of Public Safety Rob Stewart and  
25 Commissioner Lucki before the Federal Government declared an  
26 emergency, and that you made it clear on these calls that number  
27 one thing that the OPS needed were more police officers.

28           **MR. PETER SLOLY:** Yes, sir. Sorry, I know I need

1 to answer.

2 **MR. FRANK AU:** Did the federal declaration of  
3 emergency help OPS obtain more resources?

4 **MR. PETER SLOLY:** I can't tell you that because I  
5 resigned office within 24 hours.

6 **MR. FRANK AU:** I'd like to show you an email  
7 exchange between Commissioner Lucki and Mr. Mike Jones, who was  
8 Chief of Staff to Minister Mendocino. The document number is  
9 PB.NSC.CAN.00003256.

10 So the context in this email, Commissioner Lucki  
11 enumerates a few emergency measures that she believes would be  
12 useful, but then added that she's of the view that -- well, I'll  
13 let you read it. If we go down -- she gave a few examples of  
14 additional tools. But then if we go further down, she said,  
15 "[That] said, I am of the view that we  
16 have not yet exhausted all available  
17 tools that are already available  
18 through the existing legislation."

19 Do you agree with that assessment?

20 **MR. PETER SLOLY:** I don't know what she's  
21 referring to, sir.

22 **MR. FRANK AU:** The available tools, if you want  
23 to -- well, she explains in this paragraph,

24 "There are instances where charges  
25 could be laid under existing  
26 authorities for various *Criminal Code*  
27 offences occurring right now in the  
28 context of the protest. The Ontario

1                   *Provincial Emergencies Act* just enacted  
2                   will also help in providing additional  
3                   deterrent tools to our existing  
4                   toolbox."

5                   **MR. PETER SLOLY:** Again, she may be relating to  
6 elements of Coutts, Alberta, or other parts that they're  
7 involved in. I don't know if she's explicitly talking about the  
8 theatre that I was involved in. It's hard to tell what she  
9 thinks could be done. These are certainly elements that we were  
10 doing in Ottawa. Where we couldn't arrest, we were getting  
11 information to lay charges after the fact. The Ontario  
12 *Provincial Emergencies Act* had just been announced on the  
13 Friday. We were still looking -- I don't know if by this time  
14 on the -- by on the Monday that we'd even had a substantial  
15 briefing from our legal team as to what those powers were and  
16 whether or not our Incident Command Team had considered how to  
17 roll them into the ongoing evolution of the plans. I can't  
18 disagree with the position of the Commissioner, but I can't say  
19 that it applies entirely to the circumstances that I was dealing  
20 with.

21                   **MR. FRANK AU:** At that time, did you have a view  
22 on whether we have exhausted all available tools that are  
23 already available through the existing legislation?

24                   **MR. PETER SLOLY:** We meaning the Ottawa Police  
25 Service?

26                   **MR. FRANK AU:** That's right.

27                   **MR. PETER SLOLY:** Again, I come back to it, sir,  
28 we didn't have the resources to fully effectively utilize the

1 private injunction and the elements of the Ontario -- you got  
2 the *Provincial Emergencies Act* at this point. So I can't tell  
3 you that I would even have an opinion on that, other than we  
4 were just trying to get resources.

5 **MR. FRANK AU:** Okay. Now let's go back and talk  
6 a bit about we began today's discussion ---

7 **MR. PETER SLOLY:** Sorry ---

8 **MR. FRANK AU:** Yeah.

9 **MR. PETER SLOLY:** --- I do recall, just as an  
10 example, I forget which day it was. It could have been the  
11 Saturday or the Sunday. It feels like it was the Sunday. One  
12 of those trilevel calls that you referenced with Rob Stewart and  
13 Commissioner Lucki, it was the only time that Ministers  
14 Mendocino and Blair were on the call, and I joined it late for  
15 some reason. I think I had multiple competing demands. And  
16 there was a question asked. Maybe it goes to what Commissioner  
17 Lucki was talking here about existing legislation, but a  
18 question was asked of me by Minister Blair, "Have you considered  
19 doing by-law enforcement?" Which I thought was a strange  
20 question. And I said, "Yes, we've been doing by-law enforcement  
21 from the very beginning." And then he asked a second question,  
22 "Well, have you considered towing trucks?" And I said, "Yes,  
23 we've been towing trucks from the very beginning, but we don't  
24 have sufficient officers to do full enforcement and we don't  
25 have sufficient trucks to do extensive towing." Maybe that has  
26 something to do with this we haven't exhausted all the tools  
27 comment, but that's the only context that I can think of.

28 **MR. FRANK AU:** Okay. Now we began our

1 discussions today with questions about the Ottawa Police Service  
2 at the time the convoy arrived. And now we're into -- well into  
3 February. I want to come back to the question of your  
4 confidence in the OPS team. On the day before your resignation  
5 on the 14<sup>th</sup> of February, we have this communication -- your  
6 communication with Chair Deans. If I could find the reference,  
7 could we go to OPS00014566, page 6?

8                   So this is a call on February the 14<sup>th</sup>. So if we  
9 scroll down a little,

10                                 "When asked by Chair if any of my  
11 orders were disobeyed during the  
12 demonstration, Chief advised there have  
13 been major issues with senior  
14 leadership team members but he has not  
15 had time to do an investigation on what  
16 has been going on here. The best and  
17 the worst of us have been strained -  
18 [that] is why there has been tense  
19 meetings and why some have not  
20 demonstrated their best [efforts].  
21 Like everyone, I have been at my best  
22 and I have not been at my best"

23                   Can you explain what you meant there?

24                   **MR. PETER SLOLY:** There was a discussion in there  
25 with the Chair around the quality of support that I was  
26 receiving inside the organization and my own sense of where we  
27 were at at the leadership level. A reasonable question from the  
28 Chair of the Police Services Board at the direct employee level

1 that the Board has with myself, and in this case only Deputy  
2 Chief Bell because Acting Deputy Chief Ferguson was not an  
3 employee of the Board.

4 And I gave my best answer to her, there were some  
5 challenges. I mean, I actually think these notes capture it  
6 well. I -- there would be elements of some of those leadership  
7 challenges that would need to be reviewed in an after-action  
8 report, again, I didn't have a chance to ever conduct that. And  
9 I had made decisions on the fly in the midst of this very fluid  
10 situation to address conduct issues and park them or address  
11 them and move on from them completely.

12 But I also gave the caveat that there had been  
13 incredible levels of stress and fatigue, and that clearly no  
14 one, including myself, could claim that they were always  
15 operating in their best, at their best.

16 **MR. FRANK AU:** How did that lack of trust affect  
17 the leadership of the OPS during the convoy events in the sense  
18 did it make you more likely to step in and provide directions  
19 because you could not trust others to lead at the Strategic or  
20 Operational levels?

21 **MR. PETER SLOLY:** No. It's an important question  
22 you're asking, and it's a -- not an easy question to answer. So  
23 please if you can give me some leeway here.

24 There was a significant trust issue. That's the  
25 only significant trust issue that I was aware of and I thought  
26 had a material impact on the events that transpired over those  
27 weeks, was the switching out of Superintendent Rheaume for  
28 Superintendent Dunlop. And we've been through that, so I won't

1 go back to it.

2                   When I realised what had happened, as close as I  
3 can, good discipline should be in the smallest -- small "d"  
4 discipline, should be applied as quickly to the event. I  
5 immediately called a meeting with the two Command Officers. I  
6 asked them a straight question, and to their credit they gave me  
7 straight answers. I wasn't happy with the answers, meaning I  
8 was disappointed that they had chosen to go that route, and I  
9 expressed that immediately and clearly.

10                   And then I counselled them immediately, and I  
11 told them what good behaviour would look like going forward, and  
12 then I moved on from it. And as I said earlier on, they both in  
13 their own ways worked back towards demonstrating trust and  
14 capability.

15                   What I was asked here was overall what's  
16 happening, and I related that circumstance, but there were other  
17 elements of a lack of cohesion within the team. People making  
18 assumptions. We've already elements of people taking a rumour  
19 and assuming it's truth and how that impacted a range of issues  
20 from PLT to whether or not there was a plan to whether or not  
21 the plan had been approved.

22                   So those were issues that I was dealing with on  
23 an ongoing basis. They were difficult issues to deal with.  
24 They took time and energy away from everybody involved,  
25 including me. And in some cases, they caused confusion.

26                   So those are the types of things I was trying to  
27 relate to the Chair, but I was also trying to relate the context  
28 in which we had found ourselves, unprecedented, uncharted,

1 unrelenting pressures, inside the organisation and outside the  
2 organisation, to not leave with her with the impression that we  
3 were having some sort of a mass internal revolt. That was my  
4 understanding at that time, and that's what I tried to relay as  
5 honestly and as fully to the Chair at that time.

6 **MR. FRANK AU:** Now, there are two other events I  
7 want to cover. So you had this conversation with Chair Deans on  
8 the 14th. I want to ask you about the 13th, as well as on the  
9 15th. So let's start with the 13th.

10 I'm skipping ahead. I jump a few things because  
11 in the interest of time.

12 We've heard from the other witnesses, including  
13 Chief Pardy and Superintendent Bernier that  
14 Superintendent Bernier was working closely with the Integrated  
15 Planning Group as of the 12th, and by the 13th they have signed  
16 off on a plan, and we've seen the plan.

17 There was an email that was exchanged on or  
18 around the 13th that I'd like to take you to so as to clarify  
19 what your understanding was as to the evolving plan that you  
20 described. Can I take you to OPP00001547.

21 So if we go to the very bottom of the chain, this  
22 email chain originated from you to Deputy Chief Ferguson, you  
23 ask her to please send you the latest version of the Operations  
24 Plan that you approved on Wednesday, February 9th. That was the  
25 day when you met with the Integrated Planning Group that we  
26 talked about, and then you also ask:

27 "...to please advise if the plan has  
28 received official



1                   approvals/signatures/etc as there seems  
2                   to be some concerns about this from the  
3                   RCMP."

4                   If we go up one level.

5                   So Deputy Chief Ferguson replied to you, saying:

6                    "In checking with Rob Bernier, he  
7                    finally had a chance to review the plan  
8                    from the Integrated Planning team and  
9                    has sent it back with his comments.  
10                  He would prefer that it be completed  
11                  and signed off and will then share the  
12                  plan, as he is the final approver of  
13                  it.

14                  As for version 3.0, Ottawa Truck Demo  
15                  '22 [9th of February]..."

16                  I think she attached ---

17                  **MR. PETER SLOLY:** Yes.

18                  **MR. FRANK AU:** --- that as a -- as per your  
19 request.

20                  So we've heard from both Deputy Ferguson and from  
21 Superintendent Bernier. Superintendent Bernier was very clear  
22 that to him the 3.0 and the February 13th plan were very  
23 different plans. So I just want to get your comment on that.

24                  **MR. PETER SLOLY:** They were very different plans  
25 in that they were significantly more evolved. The 13th was  
26 significantly more evolved than the 9th plan, but they were the  
27 same continuity of iterations from the pre plan that we had on  
28 January 28th.

1                   **MR. FRANK AU:** So if we go one level up the email  
2 chain, you reply to Deputy Ferguson:

3                                   "Thank you for the clarification.

4                                   I was not aware of this delay as I had  
5 approved the plan last Wednesday."

6                   By "last Wednesday", that would've been the 9th.

7                   And I put this question to both Chief Pardy and  
8 Superintendent Bernier, I believe, and they disagree that you  
9 had approved any plan the previous Wednesday, in part because  
10 there was no plan to approve the previous Wednesday.

11                   **MR. PETER SLOLY:** And again, I understand the  
12 perspective of Chief Superintendent Pardy that he did not  
13 consider what we had presented to him as a plan. I disagree  
14 with that assessment. It may not have been to his standard or  
15 the OPP's standard, but it was the plan evolved since  
16 January 28th through several iterations, some of which we've  
17 seen here today, that was signed off by Inspector Lucas and  
18 Superintendent Rheume, and continued through until the next  
19 signature blocks appeared on the February 13th version of the  
20 same plan.

21                   I can appreciate Chief Superintendent Pardy might  
22 not have known of the iterations that preceded it, he might not  
23 have understood our business processes and policies, and he  
24 might have assumed that this was a brand new plan. I'm also  
25 aware of an email from Superintendent Lue of the RCMP that  
26 shares my impression, that the February 9th plan was being used  
27 by the Integrated Planning Team to build on.

28                   And that is entirely my understanding. That is

1 why when I sent the email to Acting Deputy Chief Ferguson, "send  
2 me the latest version", I wasn't talking about the February 9th  
3 plan. "What was the latest iteration that had developed since  
4 then? I just need to see. Is there a new org chart? Have you  
5 got an updated mission statement? Have you got a better sense  
6 of objectives you want? Are there subplans that I should be  
7 looking at?" I just needed an update.

8                   And I was having phone calls on a daily basis  
9 with Commissioners Carrique and Lucki in which there was these  
10 constant questions of "Have you signed off on it?", and I would  
11 respond, "I don't sign off on the plans." "Well, we heard it's  
12 with you." "It's not with me. I haven't even been briefed on  
13 it yet." "Well, we've heard it's you that have to approve it."  
14 "I don't approve the plans." I have to tell you we went around  
15 and around on that.

16                   And this is me trying to finally just say,  
17 "Trish, whatever is the latest version send it to me. If it's  
18 been signed off, please send to me quickly so I can forward it  
19 to Carrique and to Lucki -- Commissioners Carrique and Lucki."

20                   And that's exactly what I did at the end, I think  
21 somewhere around nine o'clock, I said, "Here it is. You can see  
22 the signatures on it. It's Bernier, it's Lue", sorry, I should  
23 use their ranks, "Superintendent Lue,  
24 Chief Superintendent Pardy, and Acting Superintendent Bernier.  
25 It's signed off. It's done." I never had to approve it,  
26 there's no signature line, it's being implemented. I think  
27 there were still questions after that. I cannot, to this day,  
28 understand why there are still questions about whether or not

1 the plan was approved and signed off. It had been approved. It  
2 had been signed off.

3 **MR. FRANK AU:** Finally, I'd like to take you to  
4 the events of the 15<sup>th</sup> of February. That was the day you  
5 resigned. At the time of your resignation, did you think that  
6 the OPS was well positioned to end the occupation?

7 **MR. PETER SLOLY:** I think we were well  
8 positioned. I wouldn't say we had reached a position of  
9 certainty but we were well positioned. We had, at that point, a  
10 significant level of integration. We had received significant  
11 levels of resources including expertise, including experienced  
12 leaders of the quality of Chief Supt. Pardy, Supt. Lue, and  
13 others. I think at that time, we actually had the strongest of  
14 the different iterations of incident command teams with Acting  
15 Supt. Bernier as the event commander.

16 I think at that point he had a deputy commander  
17 in OPP Insp. Springer. Both of them seemed to have a very good  
18 rapport. And Insp. Springer, I believe, was one of the most  
19 experienced and trained incident commanders, if not in the  
20 province, across the country and there really seemed to be a  
21 sense of structure to what they were doing, and they were  
22 building in position that, in my experience as an incident  
23 commander and the roles I played in Toronto Police, were very  
24 useful for us, and I can see how they were being applied here.

25 So my sense was we had a strong and increasingly  
26 stronger plan, a strong and increasingly stronger level of  
27 integration, and finally, demonstrably, a greater level of  
28 resources coming. But it was that last area that I still that

1 there was -- there were challenges in getting those resources.  
2 And it's in that particular aspect that played probably the  
3 biggest role in my decision to resign my office.

4 **MR. FRANK AU:** We've heard from other witnesses  
5 that after your resignation, things appeared to move quicker.  
6 Do you have any idea why that might be the case?

7 **MR. PETER SLOLY:** We had a very strong integrated  
8 team. We had very strong leaders in that team. There was  
9 clarity around the plan. I suspect, yes, when there's a  
10 leadership change, there's always a sense of there's a change,  
11 and that change alone, as you've seen in decisions to replace a  
12 hockey mid-season or whatever, the team plays well for three or  
13 four games and the old challenges that hadn't been addressed yet  
14 come back pretty quickly after. So I don't in any way challenge  
15 the notion that the change created a change but I do note that  
16 the level resources flowing was incredible at that point and  
17 that within three or four days there was sufficient resources on  
18 the ground to execute successfully the operations that have  
19 already been described in this court.

20 **MR. FRANK AU:** When you attended your interview  
21 with us, you told us that the primary reason for your  
22 resignation was consideration of public safety.

23 **MR. PETER SLOLY:** Yes, sir.

24 **MR. FRANK AU:** Tell us what you meant.

25 **MR. PETER SLOLY:** Well, I think I started off my  
26 testimony here today, Commissioner, with my thoughts on public  
27 safety being one of, if not the number one reason -- public  
28 trust being, if not one of the number one reasons for public

1 safety. I gave lengthy descriptions throughout the course of  
2 the day here around the impact of public trust in the first day,  
3 that Saturday. The public's opinion, the opinion of three  
4 levels of government, opinions of civil society leaders, that I  
5 think unfairly and unnecessarily laid the blame of this thing on  
6 the Ottawa Police Service. We did our very best for as long as  
7 we could. We sought the resources and the help that we could.  
8 We integrated and implemented those resources, ultimately,  
9 successfully.

10 But on the morning of February 15<sup>th</sup>, it was clear  
11 to me that the trust factor in Ottawa Police Service was still  
12 headed in the wrong direction and the only person that could  
13 take that pressure off the Ottawa Police Service was me and I  
14 made that decision to resign from office to get the resources on  
15 the ground to support the safety of our communities and, quite  
16 frankly, to support the safety to health and wellness of our own  
17 members and our partner agencies that were, at that point, in  
18 the theatre.

19 **MR. FRANK AU:** Now, when we began our examination  
20 this morning, I took you to your CV. Can we bring up the CV  
21 again? It's Document No. COM00000759. So at the top of your CV,  
22 there's a motto:

23 " Others before self. Compassion for  
24 all."

25 What is that on your CV?

26 **MR. PETER SLOLY:** It's just how I was raised.  
27 It's who I am. Everything after that is just what I did.

28 **MR. FRANK AU:** Thank you.

1 Commissioner, those are my questions. My  
2 colleague, Mr. Rodriguez, will have more after the break, if you  
3 see this as an appropriate time.

4 **COMMISSIONER ROULEAU:** Okay. So we'll take a 15-  
5 minute break and then come back to complete the examination by  
6 Commission counsel.

7 **THE REGISTRAR:** The Commission is in recess for  
8 15 minutes. La Commission est levée pour 15 minutes.

9 --- Upon recessing at 4:19 p.m.

10 --- Upon resuming at 4:34 p.m.

11 **--- MR. PETER SLOLY, Resumed:**

12 **THE REGISTRAR:** Order. À l'ordre.

13 The Commission is reconvened. La Commission  
14 reprend.

15 **COMMISSIONER ROULEAU:** Well maybe I'll take  
16 another couple of minutes in the circumstances.

17 **THE REGISTRAR:** La Commission levée pour quelques  
18 minutes. The Commission is in recess for a few minutes.

19 --- Upon recessing at 4:34 p.m.

20 --- Upon resuming at 4:37 p.m.

21 **--- MR. PETER SLOLY, Resumed:**

22 **THE REGISTRAR:** À l'ordre

23 The Commission is reconvened. La Commission  
24 reprend.

25 **COMMISSIONER ROULEAU:** Okay. Are you okay to  
26 continue?

27 Okay. Go ahead.

28 **--- EXAMINATION IN-CHIEF BY MS. NATALIA RODRIGUEZ:**

1                   **MS. NATALIA RODRIGUEZ:** Okay. Good afternoon,  
2 Mr. Sloly. Nice to see you again.

3                   **MR. PETER SLOLY:** Good to see you too.

4                   **MS. NATALIA RODRIGUEZ:** For the record, it's  
5 Natalia Rodriguez for the Commission.

6                   **MR. PETER SLOLY:** Thank you, ma'am.

7                   **MS. NATALIA RODRIGUEZ:** I'm going to pick up  
8 where my colleague, Mr. Au, left off with your resignation.

9                   Can I ask, was it your decision to resign?

10                  **MR. PETER SLOLY:** It was ultimately my decision.  
11 There was a lot of factors that went into it. Yes.

12                  **MS. NATALIA RODRIGUEZ:** Did the Board ask you to  
13 resign?

14                  **MR. PETER SLOLY:** There were significant  
15 pressures. It was clearly, to me -- it was clear to me that the  
16 Board, specifically Chair Deans, had lost confidence in my  
17 position, and that was a factor in my decision.

18                  **MS. NATALIA RODRIGUEZ:** Now, I believe Chair  
19 Deans told us when she was here last week that she did not lose  
20 confidence in you. But you're saying you felt that she had lost  
21 confidence in you?

22                  **MR. PETER SLOLY:** From statements made and --  
23 yes. The totality of the circumstances, yes.

24                  **MS. NATALIA RODRIGUEZ:** Okay. And did the Board,  
25 anyone at the Board, or the Chair, express that they had lost  
26 confidence in you?

27                  **MR. PETER SLOLY:** On the evening of February 14<sup>th</sup>,  
28 I received a phone call from the Board Chair essentially asking



1 would I consider resignation?

2 **MS. NATALIA RODRIGUEZ:** Okay. So I assume you're  
3 familiar -- and maybe I shouldn't assume -- are you familiar  
4 with the evidence that she gave on that exchange last week?

5 **MR. PETER SLOLY:** I'm aware of some of it, but  
6 I'd be happy to receive more context or information around it.

7 **MS. NATALIA RODRIGUEZ:** Well, maybe you can tell  
8 us how it transpired from your perspective?

9 **MR. PETER SLOLY:** Twenty-one (21) days into an  
10 event of the size and nature that we were dealing with, and 9:30  
11 at night, at the end of I don't know how many hours and days of  
12 in that day I worked, you get a phone call from your Chair  
13 discussing rumours and then pivoting into, "Have you thought  
14 about resigning?" conversation, for me is a pretty clear  
15 indication that I no longer had the confidence of the Chair, and  
16 by the Chair, the Board of the Ottawa Police Services.

17 **MS. NATALIA RODRIGUEZ:** And as she tells it, at  
18 that time, you told her that you would not resign, but then the  
19 next morning, you called her to say that you had reconsidered;  
20 is that accurate, from your perspective?

21 **MR. PETER SLOLY:** I told her that I put my heart  
22 and soul into this organization, the mandate that she had given  
23 me, and that I'd be seeing this thing through, and that at 9:30  
24 at night, it was a very inappropriate conversation to be having  
25 with me. I wasn't going to be giving it any more consideration.

26 **MS. NATALIA RODRIGUEZ:** And so what made you  
27 change your mind?

28 **MR. PETER SLOLY:** The almost 11 hours' worth of

1 continuing to manage the situation in this city on behalf of the  
2 Ottawa Police Services.

3 **MS. NATALIA RODRIGUEZ:** And did anyone within the  
4 City of Ottawa or the Government of Ontario or the Government of  
5 Canada express to you that you should resign?

6 **MR. PETER SLOLY:** I'm a little bit -- I realize  
7 I'm not supposed to be referencing other people's testimony or  
8 evidence presented already, but I am aware of a very alarming  
9 text, apparently from Brenda Lucki, Commissioner Lucki to  
10 Commissioner Callique. I wasn't aware of it before my decision,  
11 but I am now aware of it now. So I don't know how to relate  
12 that into this situation, so ---

13 **MS. NATALIA RODRIGUEZ:** Well, it's more about did  
14 anybody tell you, did anybody put pressure on you or suggest to  
15 you that you should resign, that at the time, obviously, you  
16 would have been aware of that if somebody had said that to you?

17 **MR. PETER SLOLY:** Thank you. That's more helpful  
18 for me.

19 I had direct experiences with officials at three  
20 levels of government. I had direct experiences with three  
21 levels of government over the course of the time of these events  
22 that left me with a clear sense that I had no -- little to no  
23 support from elements at those three levels.

24 **MS. NATALIA RODRIGUEZ:** In all three levels?

25 **MR. PETER SLOLY:** Yes.

26 **MS. NATALIA RODRIGUEZ:** Are you aware of any  
27 political pressure on the Board to seek your resignation?

28 **MR. PETER SLOLY:** Municipal, yes, definitely.

1 There was a motion passed -- motion presented. I don't think it  
2 was passed, so clearly, yes. I don't remember if any of the  
3 Board members, the three councillors that were on the Board  
4 voted in support of that motion to remove the Ottawa Police's  
5 jurisdiction, but there was certainly, I'm aware, at the  
6 municipal level, significant pressure on the Board for that to  
7 take place.

8 **MS. NATALIA RODRIGUEZ:** My understanding is that  
9 motion didn't make it to the floor. There was not a vote on  
10 that motion.

11 **MR. PETER SLOLY:** Still, a clear indication.

12 **MS. NATALIA RODRIGUEZ:** Okay, thank you.

13 Now, I want to go back to the beginning, if I  
14 may, and just go through some of the events with you kind of  
15 from the municipal/Board lens, if you will.

16 So I want to talk a little bit about pre-arrival  
17 intelligence, and you talked about that with my colleague, Mr.  
18 Au.

19 And I want to just talk about what was -- what  
20 information was relayed to the Board with respect to what could  
21 be expected before the convoy arrived.

22 Now, Mr. -- Supt. Abrams of the OPP confirmed in  
23 his evidence that on the 27th, there was an Intersect call and  
24 on that call, OPS confirmed that their planning was on the basis  
25 of assuming 3,000 trucks coming into the downtown. You're aware  
26 of that, right?

27 **MR. PETER SLOLY:** Yes.

28 **MS. NATALIA RODRIGUEZ:** And I believe Interim

1 Chief Bell indicated in his witness summary that as the convoy  
2 drew closer, they were expecting 3,000 to 4,000 vehicles to  
3 arrive in Ottawa?

4 **MR. PETER SLOLY:** I don't remember the 3,000 to  
5 4,000 number. My memory is around 3,000, but I don't think at  
6 this point it matters.

7 **MS. NATALIA RODRIGUEZ:** Sure. And then I believe  
8 Inspector Lucas, in his evidence, confirmed that by January  
9 26th, the OPS was expecting about 10,000 people on the 29th, on  
10 that side.

11 **MR. PETER SLOLY:** I did hear that from Inspector  
12 Lucas.

13 **MS. NATALIA RODRIGUEZ:** Yes. And so now I want  
14 to just, having that context, turn to what the Board understood  
15 would be the situation on the 26th when there was that Board  
16 meeting. And my understanding is that the January 26th Board  
17 meeting was the only pre-arrival, pre-convoy meeting that dealt  
18 with the convoy; is that ---

19 **MR. PETER SLOLY:** It was -- sorry for  
20 interrupting. It was a specifically called meeting for the  
21 purpose of the convoy. I have a recollection -- I stand to be  
22 corrected -- our regular January meeting was, I think, the week  
23 before, and there was some discussion at that level. But by no  
24 means was it a briefing and I wouldn't expect the Board to have  
25 sufficient information to even form substantive questions. But  
26 I just recall there might have been some mention of it at that  
27 previous regularly-scheduled meeting.

28 **MS. NATALIA RODRIGUEZ:** Okay. My understanding

1 is it wasn't discussed in any level of detail, but you can agree  
2 with me then that this would have been the briefing meeting in  
3 which substantively, the details would have been discussed?

4 **MR. PETER SLOLY:** Yes.

5 **MS. NATALIA RODRIGUEZ:** So if we can turn to the  
6 minutes of that meeting, OPB00001257, and these are the minutes  
7 of that meeting.

8 And I want to take you to page 5. So now, this  
9 is the portion where -- and we can scroll up, actually, because  
10 just to note that there are no kind of numbers that we can see  
11 there being given -- if we can keep going up.

12 So these are -- yeah. In any event, there's no  
13 actual numbers that are provided, but there's a question from  
14 one of the councillors at page 5 regarding the numbers. So I'll  
15 just take you to page 5 then, Councillor Brockington.

16 And then the question was raised regarding  
17 whether the Service had an idea of how many people and vehicles  
18 were expected.

19 "The Service noted that although the  
20 information is in flux, the truck  
21 movement began on the West Coast and  
22 had swelled and shrunk as it has  
23 travelled. The Service is also  
24 monitoring other groups expected to  
25 participate in demonstrations over the  
26 weekend. The Service was anticipating  
27 in the 1,000 to 2,000-person range;  
28 however, they indicated that it could

1 change even with an hour."

2 So by this time, there was a plan in place  
3 assuming 3,000 trucks entering the downtown core. Why wasn't  
4 that information given to the Board?

5 **MR. PETER SLOLY:** These minutes are not verbatim  
6 minutes. I would prefer to look at a more detailed record.  
7 These are all taped. They're available on YouTube channels.  
8 These minutes of meetings were never intended to be verbatim  
9 minutes, so I'm not suggesting the number wasn't given, but I  
10 can't tell you whether or not it was. So that's my challenge  
11 with trying to refer to these as "scribe notes" or "detailed  
12 minutes" of what was discussed at the meeting. They're  
13 substantive summary points as opposed to what we've been using  
14 as scribe notes. I just ---

15 **MS. NATALIA RODRIGUEZ:** Right. But I mean, the  
16 question is kind of very directly put, how many people and  
17 vehicles are expected? And the answer appears to be 1,000 to  
18 2,000 people.

19 **MR. PETER SLOLY:** I don't know who gave that  
20 answer, ma'am. I don't know whether it was in relation to a  
21 direct question here. There was some context missing. I just  
22 don't know.

23 **MS. NATALIA RODRIGUEZ:** Okay. But you were  
24 present at this meeting?

25 **MR. PETER SLOLY:** I was, yes.

26 **MS. NATALIA RODRIGUEZ:** Okay. And so by this  
27 time, you would have known that that was the expectation or that  
28 was what the plan was based on, 3,000 vehicles, right?

1           **MR. PETER SLOLY:** Again, just to be clear, I  
2 don't think anybody had a fixed number. The 3,000 vehicles was,  
3 I believe -- and again, I stand to be corrected -- an estimate  
4 that Inspector Lucas, through his traffic team and his planners  
5 felt that could be accommodated, but that doesn't mean we were  
6 going to get exactly 3,000 vehicles. We could have got 5, we  
7 could have got 1. He was looking at an upper range that he  
8 could accommodate, but that wasn't a prediction of the number of  
9 vehicles that were expected to arrive 72 hours later.

10           **MS. NATALIA RODRIGUEZ:** But in terms of numbers,  
11 this was the only pre-arrival briefings, so there were no other  
12 updates that were provided to the Board about the number of  
13 people or vehicles expected?

14           **MR. PETER SLOLY:** No. I -- this was a formal  
15 Board meeting, but I had been in regular daily contact with the  
16 Board. There were calls that took place this week with the  
17 Board Chair, was on with the mayor and team. So there was a  
18 number of other discussions, communications, formal meetings  
19 that took place in this timeframe were questions around what we  
20 had, what was coming, were we ready, "What messaging should we  
21 be providing? are you getting enough support from the city?"  
22 There's a range of other meetings and communications. This was  
23 just the only formal board meeting ---

24           **MS. NATALIA RODRIGUEZ:** Right.

25           **MR. PETER SLOLY:** --- where there was --  
26 specifically for these events.

27           **MS. NATALIA RODRIGUEZ:** Okay. And if we can go  
28 to page 2, if we look at the first paragraph, "They indicated.."

1 -- I'm just looking in the second line there:

2 "They indicated that there was a  
3 coordination of intelligence between  
4 agencies, and the Service noted  
5 expecting that the 'Freedom Convoy'  
6 would arrive in Ottawa as early as  
7 Thursday and likely remain through  
8 Sunday. Their destination remained  
9 Parliament Hill. Questions regarding  
10 counter-protests and protest groups was  
11 expressed." (As read).

12 So this was the information that was provided in  
13 terms of the expected stay of the convoy; right?

14 **MR. PETER SLOLY:** Yes.

15 **MS. NATALIA RODRIGUEZ:** But at this point, there  
16 was at least some indication from intelligence that there was  
17 the possibility that they could stay longer, right, through the  
18 Hendon Reports and other ---

19 **MR. PETER SLOLY:** There was the possibility that  
20 smaller group could stay longer as opposed to everybody arriving  
21 was going to be staying longer.

22 **MS. NATALIA RODRIGUEZ:** Okay. And my  
23 understanding was that there was in-camera portion to this  
24 meeting.

25 **MR. PETER SLOLY:** I honestly, at this point,  
26 can't remember.

27 **MS. NATALIA RODRIGUEZ:** Okay.

28 **MR. PETER SLOLY:** I'll take your word for it.



1                   **MS. NATALIA RODRIGUEZ:** So I guess my question is  
2 -- the OPS had much more detailed information about what was  
3 expected by this point in time. So my question is, why not  
4 share that with the board as, you know, they are tasked with  
5 oversight and assisting in helping to prepare for these types of  
6 events?

7                   **MR. PETER SLOLY:** We answer the questions given  
8 to us by the board in the public meeting and the board has the  
9 opportunity to move the meeting into in-camera if they choose.  
10 I can't control their decision on an in-camera meeting, nor do I  
11 control the questions they ask in the public session.

12                   **MS. NATALIA RODRIGUEZ:** Right. So we did ask  
13 Councillor Deans about this and she testified that she didn't  
14 know to ask for an in-camera portion because she wasn't aware  
15 that there was additional information that could have been  
16 provided in-camera.

17                   **MR. PETER SLOLY:** I will accept that that was her  
18 explanation but, as the board chair, and a very experienced  
19 board chair on multiple boards, she would have known that that  
20 was an option.

21                   **MS. NATALIA RODRIGUEZ:** Okay. And so I  
22 understand you're saying there were other updates with the chair  
23 but in terms of the board as a body, this was the one briefing  
24 that they received and there were no updated briefings before  
25 the arrival of the convoy as more information became available;  
26 right?

27                   **MR. PETER SLOLY:** Nor would there have been time,  
28 quite frankly. I would have gone to a board meeting if directed

1 to do so but that would have probably not been the most optimal  
2 use of our time given the circumstances that were unfolding.

3 **MS. NATALIA RODRIGUEZ:** Okay. Now, I want to  
4 speak about the injunction to the City -- or you had a call with  
5 the Solicitor David White on January 30<sup>th</sup> about the possibility  
6 of seeking an injunction. Ultimately, we know that the City did  
7 seek an injunction and was successful but by that time, it was  
8 quite further along in the events and the injunction was not  
9 actually ever used as an enforcement tool. And we're trying to  
10 understand why that's the case.

11 So you recall you had a call with Mr. White on  
12 January 30<sup>th</sup> about the possibility of the City seeking an  
13 injunction; right?

14 **MR. PETER SLOLY:** Yeah. And again, just by way  
15 of context, my recollection -- again, I stand to be corrected --  
16 was that we had -- within the Ottawa Police Service, we had  
17 discussed a range of options as mitigating factors, risk-  
18 reducing factors, and an injunction was one of them. This was  
19 before the arrival of the trucks, in the pre-planning phase.  
20 Once the event unfolded, as I've described earlier, on the  
21 Saturday, there was an attempt to step that up, and I believe  
22 that is the call that you're referencing.

23 **MS. NATALIA RODRIGUEZ:** Yes. And so what exactly  
24 were you seeking from him?

25 **MR. PETER SLOLY:** We were seeking to now ask the  
26 City to get involved. It would be a City injunction, not an  
27 Ottawa Police Service injunction. We had now just seen what had  
28 landed in our city and so we had a much better understanding of

1 what we were facing, different from the sort of blue skying of,  
2 "Well, let's consider an injunction," before. And so now we're  
3 having a real discussion about the real problem that is  
4 unfolding in our city and asking the City to start to put their  
5 minds clearly to the possibility of an injunction. But we were  
6 not, at this point, strongly recommending or anything; we were  
7 just keeping all of our options on the table and trying to  
8 engage the fullest range of City supports that we could.

9 **MS. NATALIA RODRIGUEZ:** Okay. And what was your  
10 understanding of what the injunction would be for -- an  
11 injunction for what?

12 **MR. PETER SLOLY:** It would be a range of  
13 different things. And again, it would be the City's injunction.  
14 It would be their decision to decide what to put into its  
15 injunction. We were giving them some base-level ideas from a  
16 policing perspective but we would not be the only perspective  
17 necessary for them to make a decision and to include causes  
18 within that injunction.

19 **MS. NATALIA RODRIGUEZ:** Okay. And you felt that  
20 that would fit within OPS' overall plan to have an injunction  
21 from the City?

22 **MR. PETER SLOLY:** At that point, we were doing  
23 the pivot on the plan and we were just looking at all the  
24 options that we could.

25 **MS. NATALIA RODRIGUEZ:** Okay. Now, my  
26 understanding is that, at that time, there were enforcement  
27 opportunities that were not being taken because of lack of  
28 resources and potentially the concern that it might incite the

1 crowd, if I will.

2 **MR. PETER SLOLY:** Maybe just rephrase. Officers  
3 always have the discretion as to whether or how to use  
4 enforcement actions. And certainly, the crowd dynamics made it  
5 very difficult for them to do that. I know you phrased it,  
6 "There were enforcement actions not being taken." Officers were  
7 applying their discretion around enforcement, inciting other  
8 public safety issues, and officer safety issues would have been  
9 a part of that discretion.

10 **MS. NATALIA RODRIGUEZ:** Right. But I think we  
11 can agree that enforcement was not being consistently done on  
12 every occasion for various reasons, including lack of resources,  
13 potential safety concerns, et cetera; right?

14 **MR. PETER SLOLY:** Thank you, yes. Thank you.

15 **MS. NATALIA RODRIGUEZ:** So at that time, there  
16 were multiple bylaw, *Highway Traffic Act* violations so I'm  
17 trying to understand what more -- you know, considering that  
18 there were violations happening that were not being enforced,  
19 what would the injunction then add to that?

20 **MR. PETER SLOLY:** Well, it could have added a  
21 range of different things. Again, it's not an area of expertise  
22 that I have. There could have been heightened fines. There  
23 could have been new bylaws passed. There could have been,  
24 though an injunction -- maybe there would be some way to engage  
25 other elements like insurance bureaus, hotels. Again, it's not  
26 an area of expertise. I'm not a lawyer. I don't believe I've  
27 actually been involved in the drafting and carrying through of  
28 an injection all the way. I would have relied almost entirely

1 on my Legal Services team to have those conversations and they  
2 would have been entirely informed by the needs of the incident  
3 command group.

4 **MS. NATALIA RODRIGUEZ:** Fair enough. So I'll  
5 take you OTT00029695, and this is an email from David White,  
6 City solicitor, to Steve Kanellakos, who's the City Manager, and  
7 this was after his discussion with you, Mr. White's call with  
8 you. He emailed the City Manager copying others at the City  
9 about the discussion that he had just had with you. So that's  
10 the context for this email in case you haven't had the chance to  
11 see it before. So he says:

12 "I just got off the call with Chief  
13 Sloly and his team that is coordinating  
14 the OPS response to the protest on the  
15 issue of an injunction."

16 So then he says, "This is what they're looking  
17 for."

18 And then if we go to the second paragraph -- oh,  
19 third paragraph, excuse me:

20 "I also took the opportunity to explain  
21 to the chief that any request for an  
22 injunction would need to be founded in  
23 public safety concerns. While the OPS'  
24 main concern seems to be around noise,  
25 traffic impacts, public frustration  
26 based on the idea that the police  
27 should be doing something about the  
28 protest, mounting costs, air pollution,

1 et cetera, there does not yet seem to  
2 be significant violence associated with  
3 the event, nor much in the way of  
4 public safety concern..."

5 So I just want to pause there for a second. Is  
6 that what you told the City solicitor on January 30<sup>th</sup>, that there  
7 was not much of a public safety concern at that point?

8 **MR. PETER SLOLY:** Well, thank you. I can't  
9 imagine why I would ever say that. I think this is the 30<sup>th</sup> so  
10 this would be the Sunday. I mean we'd seen -- we had seen  
11 massive public safety concerns across the downtown in the red  
12 zone. They were well-publicized on mainstream media and social  
13 media events of assaults, threatening behaviour, hate incidents.  
14 I don't know how he would have taken the impression from us that  
15 these were just minor bylaw issues, public frustration, and  
16 who's going to pay the bill. I suspect all those areas were  
17 part of our discussions but he would only have to look out of  
18 his window at City Hall to understand what was happening in our  
19 city at this time, a significant public safety event happening  
20 in our city.

21 **MS. NATALIA RODRIGUEZ:** Okay. So you did not  
22 express to him that there were no significant public safety  
23 concerns at that time?

24 **MR. PETER SLOLY:** I have no recollection of that  
25 and I couldn't believe that I would ever express that to him.

26 **MS. NATALIA RODRIGUEZ:** Okay. And he says  
27 "according to the police". So do you have any sense where he  
28 would have gotten that information from?

1                   **MR. PETER SLOLY:** Perhaps he talked to other  
2 people before or after.

3                   **MS. NATALIA RODRIGUEZ:** Okay. So there seems to  
4 be a bit of a theme of conflicting narratives here about the  
5 degree of public safety, especially in the first week -- in the  
6 first weekend.

7                   So on the one hand, we have the City being told  
8 that, you know, enforcing bylaws and any laws, really, was too  
9 dangerous for public safety issues, that there was the risk of  
10 violence, there was the risk of injury and death. And I can  
11 take you to some notes where that's indicated.

12                   But on the other hand, the City was also told --  
13 at least in this email, seems to have been told that there  
14 wasn't much in terms of a public safety risk and we've seen,  
15 actually, from some EOCCG, which is the group that manages the  
16 emergency response on a municipal level -- that group was  
17 putting out updates every day and they used language such as  
18 "party-like atmosphere", "it's festive".

19                   So there seems to be these two competing  
20 narratives, was this a tinderbox waiting to explode or was this  
21 a family-friendly carnival with bouncy cases.

22                   And so I wanted to get your perspective on those  
23 two narratives.

24                   **MR. PETER SLOLY:** It was a tinderbox waiting to  
25 explode. It was not a family festival.

26                   **MS. NATALIA RODRIGUEZ:** Okay. Thank you.

27                   Now, my understanding is that in terms of the  
28 discussions of the injunction, the City got to the point where

1 they were looking at potentially seeking an injunction for  
2 various things, but they required OPS to provide them  
3 information that they can then use to support an application for  
4 an injunction. And that was never provided, according to the  
5 City witnesses that we heard from.

6 Do you have any sense of why that is?

7 **MR. PETER SLOLY:** None whatsoever. This had been  
8 assigned, I think -- again, I may be corrected by documentation,  
9 but my recollection is that Christiane Huneault as general  
10 counsel would have been lead for this. She would have relied on  
11 the supports of the Incident Command Team as well as other  
12 planning capabilities outside of the Incident Command Team  
13 within our general organization to be able to address any  
14 questions or information requests.

15 I will say on the spectrum of million things we  
16 needed to get done in real time, this was probably in the middle  
17 to bottom half of it, so it is possible that the City was  
18 waiting for updates but everyone in the organization -- my  
19 organization was busy on higher priority items at that point.  
20 So that's the best explanation I could give you.

21 But there was certainly no indication that I had  
22 that we were disinterested in supporting it. We'd simply passed  
23 it over to them and washed our hands of it.

24 **MS. NATALIA RODRIGUEZ:** Thank you.

25 Now, I understand that you were looking to have  
26 the City exercise kind of political influence at different  
27 levels of government in order to assist in getting resources and  
28 there were various -- various things you had asked them to look



1 into and to do on that February 6th email where you told them,  
2 you know, "We need 1,800 officers".

3 I believe in one of the -- and actually, maybe we  
4 should go to it, OTT00018172.

5 **MR. PETER SLOLY:** Just while that's coming up,  
6 Commissioner, if I may have your indulgence for a second.

7 Sorry. I don't know what the procedure around  
8 this is. I was asked a question earlier on and I was giving an  
9 answer and I changed midway through my answer. And it may have  
10 sounded like a complete phrase. It was a change of phrase.

11 Can I just correct the record with that  
12 indulgence?

13 **COMMISSIONER ROULEAU:** Absolutely. We're just  
14 trying to get to the bottom of things, so no, there's no -- if  
15 there's a problem -- and in fact, by the -- later in the day  
16 something comes to you, please interrupt and put it forward.

17 **MR. PETER SLOLY:** Thank you, Commissioner.

18 If I get the question wrong or the context,  
19 please correct me.

20 I believe you asked me a question to what extend  
21 did I believe that others -- that the three levels of government  
22 had lost confidence or trust in me. And I believe part of my  
23 response was I felt that all three levels had expressed very  
24 low.

25 What I was about to say was very, and then I  
26 changed to low. It came across, I believe, as very low. I just  
27 want that corrected for the record if that's ---

28 **MS. NATALIA RODRIGUEZ:** So the answer was "very"?

1                   **MR. PETER SLOLY:** No, it was "low".

2                   **MS. NATALIA RODRIGUEZ:** Low.

3                   **MR. PETER SLOLY:** But I had experienced incidents  
4 where there was clearly some level of -- low level of lack of  
5 confidence in the organization from all three levels of  
6 government.

7                   **MS. NATALIA RODRIGUEZ:** So this is the email of  
8 February 6. If we go to the first email of the thread -- right.  
9 And go up a little bit so we can see who it's from.

10                   Yeah, right there.

11                   So it's John Steinbachs from the OPS, and it's to  
12 Chair Deans and the Mayor and others in Ottawa, and you as well.  
13 And if we go down, Chair Deans and Mayor Watson:

14                   "Please find below the list of Ottawa  
15 Police Service asks to the federal,  
16 provincial and municipal levels of  
17 government that was requested yesterday  
18 by the Board."

19                   So as my colleague pointed out, on the 5th of  
20 February you were asked to provide a number of resources that  
21 you required as well as other requirements that you needed in  
22 order to bring this to an end.

23                   And if we go down, we see that you have some asks  
24 there from the City. And I wanted to just briefly ask you about  
25 a few of these, if we go down.

26                   Okay. So here -- and actually, this is an  
27 interesting question because I think we touched on it earlier  
28 but maybe didn't get a clear answer.

1                   So it says there, "The Service requires 1,800  
2 additional staffing and enforcement resources."

3                   So this is, I think, the first reference that we  
4 see to the 1,800 ask. And this is on February 6th. I believe  
5 it's at 4:07 p.m.

6                   There's later a meeting that you have with Chair  
7 Deans and the Mayor in which you provide them that number as  
8 well, and then the following day you send them an email with a  
9 chart. You might recall that chart, and that was on February  
10 7th.

11                   So the question was, you had been asked by the  
12 Board to come up with the number of resources that you required  
13 to end the protest on February 5th. And on February 6th at  
14 4:30, you send this email.

15                   So at what point did you determine the number of  
16 additional resources you needed and how? Because my  
17 understanding is the meeting that happened later with your  
18 command team was after this email was sent in the evening at  
19 7:45 p.m.

20                   **MR. PETER SLOLY:** Yeah. And again, my  
21 recollection is that as soon as that Board meeting ended on the  
22 5th, we turned our attention to start getting the information we  
23 need.

24                   So I don't -- I'm not aware of notes, scribe  
25 notes, that say my Executive Officer and my EA started to assign  
26 things to CAO Dunkirk, but there was no way that I would have  
27 left that Board meeting with that request in front of us and the  
28 extremely short timelines and simply waited 24 hours later to

1 start to have people thinking about it.

2 So that's just my recollection, and I stand to be  
3 corrected if that proves to be wrong.

4 **MS. NATALIA RODRIGUEZ:** Okay. So your  
5 understanding is that February 5th in the evening you would have  
6 had a meeting ---

7 **MR. PETER SLOLY:** As soon as that Board meeting  
8 was over, we would debrief right away, as we would with any  
9 Board meeting at the end of it, what are the substantive issues  
10 that came out, what do we need to do, what are the timelines,  
11 and certainly in this meeting that was the direction that needed  
12 our full focus and it would not have simply waited till the end  
13 of the next day to get to.

14 **MS. NATALIA RODRIGUEZ:** Okay. Yeah, I just don't  
15 think we have in our documents a meeting on February 5th in the  
16 evening where resource numbers were discussed, so I think that's  
17 the question that we're kind of left wondering with.

18 And so if we look at the third bullet point,  
19 "Professional mediation and negotiation capacity", what were you  
20 asking for there?

21 **MR. PETER SLOLY:** Again, we were trying to think  
22 of anything that could assist us. The concept of mediation and  
23 negotiation was clearly a live discussion at many levels in the  
24 organization and many levels of government, and so any  
25 particular advice, supports, expertise that we or the City could  
26 bring in could be helpful.

27 **MS. NATALIA RODRIGUEZ:** Okay. And so with that  
28 in mind, you're asking the City to exercise its political

1 influence and to look into professional mediation, even.

2           You're aware on February 6th it's also the day  
3 that the City of Ottawa declared a state of emergency. Do you  
4 recall that?

5           **MR. PETER SLOLY:** I don't recall that, but I'm  
6 not challenging the date of it.

7           **MS. NATALIA RODRIGUEZ:** And so according to some  
8 of the documents that we've seen and the evidence, the expressed  
9 intent of that declaration or at least one of the reasons for  
10 that declaration was to put pressure on the Premier to exercise  
11 powers to resolve the situation in Ottawa.

12           Did you ask the Mayor to declare a state of  
13 emergency?

14           **MR. PETER SLOLY:** I was involved in discussions  
15 around it. I've been involved in those -- had been involved in  
16 those discussions in my time in Toronto for a variety of  
17 reasons. And literally every time it ever came up in Toronto is  
18 it may get you some money, transfer payments. It might get you  
19 access to certain resources, but it's not going to give you --  
20 the declaration of state of emergency in our context here in the  
21 province isn't the same as it is in other jurisdictions in other  
22 countries.

23           So it has, put my police officer hat on, limited  
24 efficacy to support policing operations and I have limited  
25 understanding of how it supports other city functions, but even  
26 there, my understanding is it is by no means even close to being  
27 a silver bullet.

28           **MS. NATALIA RODRIGUEZ:** Sure. But it can

1 exercise some political leverage, can it not?

2 **MR. PETER SLOLY:** I can't speak to political  
3 leverage. I can only tell you what, practically, it would  
4 provide for a jurisdiction and, in my case, a policing  
5 jurisdiction.

6 **MS. NATALIA RODRIGUEZ:** Okay. Fair enough.  
7 I wanted to just ask about the legal opinion that  
8 you had received in which you said you believed, based on that  
9 opinion, that you were not able to block access to trucks  
10 entering downtown. Did I get that right?

11 **MR. PETER SLOLY:** I wouldn't put it that way.

12 **MS. NATALIA RODRIGUEZ:** Okay. How would you put  
13 it?

14 **MR. PETER SLOLY:** We had a legal opinion --  
15 sorry, can you just frame your question again, please?

16 **MS. NATALIA RODRIGUEZ:** Sure. My understanding  
17 is that pre-convoy, or when the convoy arrived, we saw an  
18 opinion, in any event, that was dated January 28, and I assume  
19 you saw it sometime after that?

20 **MR. PETER SLOLY:** No, we requested on the 27<sup>th</sup>, it  
21 arrived on the 28<sup>th</sup>. I don't know the date that I saw it, but it  
22 was still in and around that time. And again, the events  
23 started on the 27<sup>th</sup>, went through the 28<sup>th</sup>, heightened on the  
24 29<sup>th</sup>, and continued through the 30<sup>th</sup>. So it arrived in the middle  
25 of the event, not prior to the event.

26 **MS. NATALIA RODRIGUEZ:** Okay. And that goes to  
27 the heart of my question.

28 Councillor Fleury was here some time ago, a few

1 weeks ago now, and he testified that at the pre-convoy briefing  
2 with you and the City Manager, the Mayor, Councillors, this was  
3 on January 26<sup>th</sup>, he had specifically asked about maintaining  
4 truck routes in the city, and you said to him, in answer to that  
5 question on the 26<sup>th</sup>, that you had a legal opinion that said that  
6 the Charter prevented you from doing that. That's what he told  
7 us.

8                   So I want to understand what would have been the  
9 basis for your understanding that the Charter prevented that on  
10 the 26<sup>th</sup> of January when you didn't receive the legal opinion  
11 until the 28<sup>th</sup>. Was there another legal opinion?

12                   **MR. PETER SLOLY:** Probably my general counsel. I  
13 mean, I don't have an independent recollection, but before we go  
14 outside for a legal opinion, I would usually run it by my own  
15 general counsel.

16                   **MS. NATALIA RODRIGUEZ:** Okay. And you testified  
17 that by the 29<sup>th</sup>, on the Saturday, I thought I heard you say this  
18 morning, that the demonstration was an unlawful demonstration?  
19 Is that right?

20                   **MR. PETER SLOLY:** By virtue of the first law  
21 broken in and around it.

22                   **MS. NATALIA RODRIGUEZ:** Okay. And so what did  
23 you mean by that? What were the laws broken?

24                   **MR. PETER SLOLY:** Too many to list.

25                   **MS. NATALIA RODRIGUEZ:** Can you give me a sense?  
26 Like are we talking *Criminal Code* violations?

27                   **MR. PETER SLOLY:** Trite law, ---

28                   **MS. NATALIA RODRIGUEZ:** Are we talking about ---

1           **MR. PETER SLOLY:** --- *Provincial Offences Act,*  
2 *Criminal Code,* federal statutes. Too many to list.

3           **MS. NATALIA RODRIGUEZ:** Okay. So by-law, *Highway*  
4 *Traffic Act* offences. Okay.

5           So my question is, with respect to the first  
6 weekend, I think it could be assumed that 3,000 vehicles in the  
7 downtown core would lead, necessarily to *Highway Traffic Act* and  
8 by-law violations; right?

9           **MR. PETER SLOLY:** I'm sorry, just I may have  
10 missed your question. That just having 3,000 vehicles would  
11 mean that there would be offences?

12           **MS. NATALIA RODRIGUEZ:** Within a limited space,  
13 would necessarily mean some violations, such as blocking  
14 traffic, parking illegally?

15           **MR. PETER SLOLY:** In the context of a protest,  
16 yes.

17           **MS. NATALIA RODRIGUEZ:** Yes.

18           **MR. PETER SLOLY:** We probably have more than  
19 3,000 vehicles in the downtown core in Ottawa on any given day.

20           **MS. NATALIA RODRIGUEZ:** Right. But I'm talking  
21 about, you know, 3,000 tractor trailers and big heavy vehicles  
22 coming into the downtown in a space that had been designated for  
23 them to be there; right? But ---

24           **MR. PETER SLOLY:** Well ---

25           **MS. NATALIA RODRIGUEZ:** --- they weren't  
26 designated to be there to be legally parked. Clearly they were  
27 all going to be taking up lanes and preventing traffic and et  
28 cetera.



1           **MR. PETER SLOLY:** I think I understand your  
2 question, and so I'm trying to be deliberate in my answer. I  
3 can't imagine that the PLT would have negotiated, "Hey, when you  
4 come in, you can break our laws." I suspect, and I haven't seen  
5 the PLT log notes, but, "When you come in, in order to not break  
6 our laws, in order to maintain the free flow of emergency  
7 vehicles, in order to not create as many problems as could  
8 happen, we're going to try to get you to do these several  
9 things. Park your vehicles here. Carpool/rideshare downtown.  
10 We will designate areas where you can park your trucks." And in  
11 designating those areas, it would be the police facilitating  
12 that, as opposed to an independent decision by a truck driver or  
13 pick-up truck driver to violate the law on their own -- through  
14 their own decision making. That's different from us trying to  
15 facilitate a peaceful, lawful protest.

16           **MS. NATALIA RODRIGUEZ:** Okay. So then I'm just  
17 trying to understand what changed from the moment they arrived  
18 to the 29<sup>th</sup>. What additional violations would have occurred? It  
19 seems to me that by the time they arrived, those violations  
20 would have already been crystalized.

21           **MR. PETER SLOLY:** I'm not sure I understand the  
22 question, but I'll try to answer it. If I get it wrong, please  
23 redirect me.

24           And we've heard some, I think very helpful -- I  
25 want to be careful. I'm aware that Insp. Lucas describes a  
26 situation where there's sort of a race to Wellington Street.  
27 And it seems that that is one of -- one of, not the only, but  
28 one of the main factors that seems to kind of end the agreed

1 levels of cooperation that had been achieved through a lot of  
2 hard work by these PLTs. It then becomes a series of snake-like  
3 efforts to move heavy vehicles, and lots of vehicles, through  
4 the downtown core. And the traffic plan that had been set up  
5 had to be in real time rearranged.

6 All of that chaos, yes, in all of that, we  
7 started to see significant levels of by-law, *Provincial Offences*  
8 *Act* violations. Not to mention those who were either walking,  
9 riding, or in any other conveyance, starting to do a wide array  
10 of social disorder, threatening and intimidating behaviour,  
11 physically and psychologically assaultive behaviour, and yes,  
12 hate related behaviour, and ultimately *Criminal Code* violations,  
13 all of which happened in near real time over the morning and  
14 early afternoon and throughout the remainder of the time of the  
15 events in the city.

16 **MS. NATALIA RODRIGUEZ:** So if by the 29<sup>th</sup> it had  
17 become an unlawful demonstration, why was access not prevented  
18 into the downtown core by the second weekend, the 5<sup>th</sup> of  
19 February, when additional convoys came and joined? By then,  
20 surely, you would have the authority ---

21 **MR. PETER SLOLY:** You've touched on one of my  
22 frustrations.

23 **MS. NATALIA RODRIGUEZ:** Was not my intention.

24 **MR. PETER SLOLY:** That is why there's clear  
25 documentation of me saying, "Are we ready to go? Have we  
26 thought about all the things we need to do? Have we considered  
27 whether we're going to be closing more roads, more highway  
28 offramps, more bridges, based on what we learned from last

1 weekend and what we've seen in other jurisdictions." And I was  
2 really kicking the tires hard on that.

3 And that is why on the third weekend, I issued my  
4 only direct order at the operational level: close the  
5 interprovincial bridges and close the highways that give direct  
6 access to the downtown core. I rescinded that only when the  
7 then incident commander, sorry, event commander, Rob Bernier,  
8 articulated a substantially robust traffic management plan to  
9 address the circumstances that were happening at that time. And  
10 it turned out to be a very successful plan. But that remained a  
11 significant concern for me and for the organization.

12 There were more roads closed on the second  
13 weekend. There were more effective coordination around the  
14 interprovincial bridges. There was more assistance from the OPP  
15 on monitoring traffic around the King's Highways. But I really  
16 still had a lot of concerns.

17 **MS. NATALIA RODRIGUEZ:** Right. The downtown core  
18 was never hardened, so to speak?

19 **MR. PETER SLOLY:** In the fullest sense, meaning  
20 that we blocked off all of the access off ramps which I saw as a  
21 private citizen? No. To that level, that level of hardening  
22 did not exist in the three weekends that I was the Chief of  
23 Police.

24 **MS. NATALIA RODRIGUEZ:** Okay. I want to turn to  
25 OPS00005665. And this -- these are notes from a command  
26 briefing on February 1<sup>st</sup>. And I'll take you to page 3. And I  
27 think you had testified today that by the 30<sup>th</sup>, you had  
28 recognized some elements of an occupation, as opposed to a

1 demonstration. Is that right?

2 **MR. PETER SLOLY:** Yes, ma'am.

3 **MS. NATALIA RODRIGUEZ:** And so it says, that  
4 first point:

5 "If more demonstrators are expected back  
6 this weekend, early request for resources  
7 is required; decision on whether this is  
8 an occupation needs to be made by  
9 tomorrow; use experienced resources ie Rob  
10 Bernier and others - pull from sections"

11 Why did there need to be a decision about how to  
12 kind of classify this kind of a demonstration, whether it was an  
13 occupation or not? What turned on that?

14 **MR. PETER SLOLY:** I -- this is the first time I'm  
15 seeing the email. I don't know the context of the meeting.  
16 Seems to be Kenny Bryden -- sorry, Insp. Bryden would be within  
17 the Intelligence Directorate. So I don't know the nature of  
18 this.

19 **MS. NATALIA RODRIGUEZ:** Okay. Fair enough.  
20 And if we can go to the bottom of page 2? And  
21 trying to find my reference. Yeah, just at the bottom. The  
22 third line from the bottom.

23 "PLTs have done an excellent job in  
24 preventing rioting and de-escalation by  
25 overall position in change needs to  
26 happen; looking more like an occupation  
27 than a negotiated end..."

28 If we could just keep going?

1                    "...too many photos of police with  
2                    protestors/trucks - Chief would like this  
3                    addressed"

4                    Now this -- you also conveyed this sentiment to  
5 the Mayor and to the Councillors on the 31<sup>st</sup>, explaining that you  
6 didn't think that this was okay, photos being taken between  
7 police officers and protestors. So I just wanted to ask,  
8 Inspector Lucas testified this week that this was part of de-  
9 escalation, that this was trust building. It seems like you  
10 might have had a different view, so I just wanted to ask about  
11 that.

12                    **MR. PETER SLOLY:** Yeah. No, I'm not sure where  
13 you got the information that I said it was not a good thing,  
14 Counsel.

15                    **MS. NATALIA RODRIGUEZ:** Okay. So I'll take you  
16 to OPS00005187, and this is notes of a meeting that you had with  
17 the mayor.

18                    So update from chief. And if we go to the bottom  
19 ---

20                    **MR. PETER SLOLY:** Whose notes are these?

21                    **MS. NATALIA RODRIGUEZ:** Michael Anderson sent  
22 these to John Steinbachs. It's points of the meeting that  
23 happened on the 31st, update from mayor to chief, and then  
24 there's -- you give an update first and then it looks like the  
25 mayor has some things to say after.

26                    **MR. PETER SLOLY:** Okay.

27                    **MS. NATALIA RODRIGUEZ:** So if we go to 7, if we  
28 go to page 7, and I believe there were councillors here at this

1 meeting as well.

2 So at 7(f), Councillor Menard says:

3 "Curious on why certain behaviours are  
4 being allowed to continue. Not  
5 peaceful, need to move on from that  
6 language. Want services to be  
7 maintained and acts of hatred to be  
8 addressed. Residents should not feel  
9 intimidated. By law services should  
10 continue."

11 And so (f) seems to be your answer. I had asked  
12 one of the witnesses who was answering these questions and I  
13 believe it was Mr. Kanellakos said that for the most part, you  
14 would answer these questions.

15 And so the last line there, "Officers posing in  
16 images is unacceptable and are following up."

17 Again ---

18 **MR. PETER SLOLY:** Sorry.

19 **MS. NATALIA RODRIGUEZ:** --- I can give you more  
20 context if you like. There's another notation, your last full  
21 day in office of February 14 when you also kind of addressed the  
22 same issue. And if it's helpful, I can take you to that,  
23 OPS00014566.

24 And these are, I believe, your notes. And if we  
25 go to 1932 -- or sorry, 9:32 -- okay. So Chief's Morning Brief.  
26 If you look at the first point, Media Report 2XJTF2. Do you  
27 know what that reference is, what that is?

28 **MR. PETER SLOLY:** Sorry, Task Force Officers.

1                   **MS. NATALIA RODRIGUEZ:** Okay.

2                   "Were supporting the demo here in  
3                   Ottawa, supporting the command and  
4                   control of it, now being investigated  
5                   internally. Pat Morris last night ---  
6                   "

7                   I assume this means indicated; he was not  
8                   indicted, correct?

9                   **MR. PETER SLOLY:** Not that I'm aware of.

10                  **MS. NATALIA RODRIGUEZ:** Okay.

11                  "Pat Morris last night indicated we  
12                  might have a significant issue with  
13                  police members being involved in  
14                  demos."

15                  So I just wanted to ask about concept in general.

16                  **MR. PETER SLOLY:** Yeah.

17                  **MS. NATALIA RODRIGUEZ:** How did -- the public was  
18                  seeing this; the public was pushing back a little bit. And so  
19                  what is your view on that?

20                  **MR. PETER SLOLY:** Thank you. The language used  
21                  around the officers posing in photos are problematic to me. If  
22                  I was not clear in my language, I'll accept that.

23                  I accept and adopt the views as relayed by  
24                  Inspector Lucas. Officers will often have to do a fist bump or  
25                  lean in for a selfie just to try to keep the temperature down in  
26                  circumstances they're in. That is just the reality of almost  
27                  any circumstance, any day, not even requiring something of this  
28                  level, just in order to try to build rapport in a minute so to

1 keep things at the right level or de-escalate things that could  
2 be escalating. And I'll always defer to an officer on that.

3 In the broader sense, I could understand -- and  
4 maybe that's where my comments were attributed -- in the broader  
5 sense, these photos that are being -- going viral on social  
6 media without proper context, would be extremely problematic and  
7 were extremely problematic. They were used extensively in the  
8 social media disinformation and misinformation campaigns, and  
9 unfortunately, crept into some of the mainstream media reporting  
10 as well.

11 I think it's more in that context that I would be  
12 talking about it as opposed to every single officer I saw in a  
13 photograph doing a fist bump or a thumbs up was unacceptable.  
14 That's never been my experience, and I would have done the same  
15 things and had done the same things throughout my policing  
16 career, and wouldn't expect to be sanctioned by a superior  
17 officer if they took the time to find out as to why I was doing  
18 it.

19 **MS. NATALIA RODRIGUEZ:** And do you think this  
20 might have contributed to the erosion of the residents' trust in  
21 the OPS?

22 **MR. PETER SLOLY:** There's no doubt that the  
23 photographs of officers -- sometimes they weren't even officers  
24 in the Ottawa theatre that were being passed around on social  
25 media saying, "Look what's happening in Ottawa."

26 So there was just a lot of that going on, and I  
27 can understand why the public, without the context that we're  
28 sharing here now, would just look at that and say, "Oh, that's



1 sympathy from the officers to the movement or various movements  
2 represented."

3 **MS. NATALIA RODRIGUEZ:** I want to talk now about  
4 the role of the Board. How would you describe the Board's  
5 oversight function? What is the scope of their oversight?

6 **MR. PETER SLOLY:** Primarily to set the strategic  
7 direction of the police of jurisdiction, ensure that the police  
8 of jurisdiction has adequate resources to develop, to deliver  
9 adequate and effective services, and to hire and manage the  
10 chief of police and the two deputy chief positions, or in our  
11 case, two deputy chiefs.

12 **MS. NATALIA RODRIGUEZ:** And what's your  
13 understanding of the Board's role in a major event?

14 **MR. PETER SLOLY:** In the same respect, they have  
15 an oversight body. Does it align to strategic purposes? Are  
16 there any policies that come into play? Are there adequate  
17 resources? What is the performance of chief and command, and  
18 through them, the performance of the organization?

19 **MS. NATALIA RODRIGUEZ:** And do they have a role  
20 ongoing throughout the duration of a major event?

21 **MR. PETER SLOLY:** They have the same role ongoing  
22 every single day, regardless of whether there's a major event or  
23 not.

24 **MS. NATALIA RODRIGUEZ:** Can I take you to  
25 OPS00014484? And I'll take you to page 36. And I believe these  
26 are some of your notes. We've seen these before, notes about  
27 meetings that you've -- that you often make to yourself, and  
28 this one's dated February 5th. The subject line is "Call From

1 Chair Deans".

2 I understand here she's called you for a Board  
3 meeting and you say:

4 "I advised that I was fully focused on  
5 the major demonstration and all other  
6 operational priorities. I can refuse a  
7 Board direction."

8 I assume that means can't?

9 **MR. PETER SLOLY:** Yes, very much so.

10 **MS. NATALIA RODRIGUEZ:** Okay.

11 "I can't refuse a Board direction for a  
12 meeting, but I stated that I would put  
13 my ability to lead the Service in this  
14 critical operation in jeopardy, and  
15 should be delayed until Monday."

16 So was it fair to say that these meetings were  
17 distracting you from your operational responsibilities?

18 **MR. PETER SLOLY:** Not distracting. I understand  
19 the need that the Board was trying to fulfill, but every minute,  
20 every hour, where one or all of the command and supporting  
21 personnel were not focused on managing the events was less  
22 resources that we could put to those events, less leadership  
23 that we could provide to support those who were leading those  
24 events.

25 So it's -- there's only a finite amount of time  
26 in any day, and on some days, I spent three, four hours on Board  
27 meetings and had my two deputy chiefs there as well. I think in  
28 every occasion, we had the full command team there.

1                   So I understand. It's not a distraction, but it  
2 is a demand on time, and it's in that context of demand on time.

3                   **MS. NATALIA RODRIGUEZ:** And from her testimony  
4 last week, we understand that the Board started asking for more  
5 information, more details of an operational plan to bring an end  
6 to the demonstration as of about February 5th. There was some  
7 more pressure to provide that information. Would you -- is that  
8 a fair assessment?

9                   **MR. PETER SLOLY:** Yes.

10                  **MS. NATALIA RODRIGUEZ:** And I can take you to the  
11 meeting minutes of that Board meeting on February 5th,  
12 OPB00001264. And at page 5, paragraph 2:

13                                 "Although the Board expressed  
14 frustration at the lack of clearly  
15 outlined plan that would result in the  
16 end of the demonstration, the Service  
17 noted having articulated a framework  
18 aimed at their surge and contain  
19 strategy."

20                  So what did you understand the Board to be  
21 requesting in terms of information at this time?

22                  **MR. PETER SLOLY:** Just what they're asking for, a  
23 clearly-outlined plan that would result in the end of the  
24 demonstration.

25                  **MS. NATALIA RODRIGUEZ:** And you were not able to  
26 provide that to the board?

27                  **MR. PETER SLOLY:** Not on February 5<sup>th</sup>, no.

28                  **MS. NATALIA RODRIGUEZ:** Okay. And why was that?

1           **MR. PETER SLOLY:** Because there was no way to end  
2 the demonstration with the resources we had at that time and we  
3 were in the process of pivoting the plan to put that in place.

4           **MS. NATALIA RODRIGUEZ:** So there wasn't a fully  
5 formed plan ---

6           **MR. PETER SLOLY:** That's right.

7           **MS. NATALIA RODRIGUEZ:** --- that you could take -  
8 --

9           **MR. PETER SLOLY:** We're still evolving that plan  
10 from the pre-planning piece. We're still trying to gather the  
11 resources necessary to move from -- simply, at this point in  
12 February 5<sup>th</sup>, still just holding onto the red zone and not  
13 allowing anything else in there but not really able to do much  
14 more than that.

15           **MS. NATALIA RODRIGUEZ:** Right. So this meeting  
16 did go in-camera, and I'm going to take you to the in-camera  
17 meeting minutes, OPB0001647. And so at page 2, the 4<sup>th</sup> paragraph  
18 -- sorry, if we can -- oh, sorry, yeah, at the bottom, the last  
19 -- the paragraph at the bottom:

20                           "The Chief reassured the Board that  
21                           there was a comprehensive plan,  
22                           however, he could not provide all the  
23                           details of what the Service was doing  
24                           operationally."

25           So I just want to marry that with the concept  
26 that by February 5<sup>th</sup>, there was not actually a well kind of  
27 conceived fully formed plan but the board is being told there is  
28 a comprehensive plan. So I just want to give you a chance to

1 reconcile that.

2           **MR. PETER SLOLY:** There's not much  
3 reconciliation. I mean there's a comprehensive plan. We've  
4 looked at the full range of issues from PLT to POU, enforcement,  
5 intelligence gathering, traffic. We are engaging in all sort of  
6 efforts to get resources into the organization. It's  
7 comprehensive. It's just not into the detailed levels of sub-  
8 plans and dates and times when operations will take place,  
9 assuming that there are resources available. So  
10 "comprehensive", it covers the full range of what we need to  
11 have in a plan. Back in the details in order to be able to say,  
12 "A week from now, with these 1800 resources, we should have the  
13 ability to execute a POU plan in the morning of, and by the end  
14 of the evening, we should have cleared 75 percent of the red  
15 zone," I couldn't give them that.

16           **MS. NATALIA RODRIGUEZ:** Right, but they're asking  
17 for a plan that would result in the end of the demonstration and  
18 you're saying, "Well, there's a comprehensive plan. Don't  
19 worry."

20           **MR. PETER SLOLY:** There's a comprehensive  
21 framework. I don't know if "plan" is the sense -- but that's  
22 the reconciliation I can give you.

23           **MS. NATALIA RODRIGUEZ:** Okay. Now, Councillor  
24 Deans testified that she understood there was an evolving plan  
25 but she was asking for details about a plan to end the  
26 demonstration, which was not provided to her.

27           **MR. PETER SLOLY:** Because there was no -- at that  
28 point, there was no plan that we could say, "This will end the

1 demonstration."

2 **MS. NATALIA RODRIGUEZ:** Right. So had there been  
3 that plan, or once that plan was developed, my understanding is  
4 the board never, never saw a plan, or even a high level, or even  
5 a summary of the plan. So even by the time it was developed,  
6 that was not provided to the board. So I just wanted to ask why  
7 that would be.

8 **MR. PETER SLOLY:** Well, I can't speak to the  
9 final plan that was used in the week of -- after the 15<sup>th</sup> of  
10 February, so I don't what was provided or not provided by then  
11 Interim Chief Bell.

12 **MS. NATALIA RODRIGUEZ:** Well, I'm asking about  
13 your time, not about ---

14 **MR. PETER SLOLY:** No, I ---

15 **MS. NATALIA RODRIGUEZ:** --- Interim Chief Bell.

16 **MR. PETER SLOLY:** We never provided an  
17 operational plan in its totality in a bound document to the  
18 board. Let me be clear about one thing. The Ottawa Police  
19 Services Board provided a lot of support to the Service and to  
20 myself, our executive team on a range of issues, but there was a  
21 challenge around confidentiality on that board. There were  
22 clearly documented events where Service information, board  
23 information including in-camera discussions had been leaked by  
24 board members to the public. And so there was a concern prior  
25 to the arrival and the events of the convoy around the  
26 confidentiality -- the ability of the board to keep confidential  
27 information confidential.

28 **MS. NATALIA RODRIGUEZ:** And was -- how was that

1 being addressed?

2 **MR. PETER SLOLY:** I had formal documentation and  
3 correspondence with then Chair Deans around those concerns and  
4 specifically pointing to those events. It was up to her to  
5 investigate and remediate whatever issues. I never got a final  
6 update from Chair Deans as to the outcome of those concerns.

7 **MS. NATALIA RODRIGUEZ:** Right. But your  
8 obligation to provide the board the information they need in  
9 terms of to be able to exercise their oversight function, that's  
10 irrespective of whatever internal issues the board may be  
11 dealing with on its own; right?

12 **MR. PETER SLOLY:** It is a factor that came into  
13 my consideration as to the level of detail that I could provide  
14 on intelligence, threat risk assessments, operational plan, or  
15 other operational details.

16 **MS. NATALIA RODRIGUEZ:** So is your evidence that  
17 the reason that more information on the operational plan was not  
18 provided to the board because you had confidentiality concerns  
19 about that board specifically?

20 **MR. PETER SLOLY:** My evidence is that is one of  
21 the factors I had to consider, yes.

22 **MS. NATALIA RODRIGUEZ:** Okay. And so what were  
23 the other factors?

24 **MR. PETER SLOLY:** That I was not going to be  
25 handing over an entire detailed operational plan to the board.  
26 It's not a practice I'd ever seen done before. It's not one  
27 that I'd be comfortable with. And from my knowledge of the  
28 Morden Report, not one that's required.

1                   **MS. NATALIA RODRIGUEZ:** Okay. But a summary  
2 wasn't provided either; right?

3                   **MR. PETER SLOLY:** No, we did provide summaries on  
4 a regular basis.

5                   **MS. NATALIA RODRIGUEZ:** In terms of, like, a  
6 document which provides a high-level summary?

7                   **MR. PETER SLOLY:** A document? No. In hours-long  
8 board meetings, we -- all dedicated to this, we were asked,  
9 repeatedly, questions and provided as much information as we  
10 possibly could. I can't recall whether or not somebody provided  
11 a summary document. That, I can't recall.

12                   **MS. NATALIA RODRIGUEZ:** Okay. Well, Chair Deans  
13 testified that at times she did not have the information she  
14 needed in order to exercise her oversight function. Does that  
15 concern you?

16                   **MR. PETER SLOLY:** Not at -- well, it concerns me  
17 that she would characterize it that way. I had daily calls,  
18 sometimes twice and three times daily calls with Chair Deans.  
19 We offered the board, and they accepted, to do ride-alongs. I  
20 think four of the seven board members actually participated in  
21 ride-alongs that were by my Service Sergeant Major would  
22 actually put them in a police vehicle and drove them throughout  
23 the theatre in safe ways. They had hours with the Service  
24 Sergeant Major to ask any questions that they wanted. I had  
25 given explicit instructions to the Service Sergeant Major to  
26 answer those questions as fully and honestly as possible. So we  
27 went through a variety of means beyond public meetings to ensure  
28 that the board could literally see and be in the theatre, talk



1 to frontline officers, have direct access to the chief of police  
2 on a regular basis, on a daily basis, including the formal board  
3 meetings. I can't understand why Chair Deans would say that she  
4 did not have the ability to ask questions and receive  
5 information in a very timely manner.

6 **MS. NATALIA RODRIGUEZ:** Okay. I'll take you to  
7 OPS00011037, and these are again your notes. These are from  
8 February 11. And I'll take you to page 6 of your notes. And if  
9 we got to 13:01, there, where it says:

10 "Call back from Diane Deans, 13:01."

11 And then it says:

12 "Expectations for board meeting. Going  
13 to do like we did on Monday, minimum  
14 level. Cannot and won't be drawn into  
15 what I cannot lawfully provide, i.e.,  
16 staffing numbers, what the plans are.  
17 Need you to be clear and understanding  
18 about that."

19 And if we keep going:

20 "The response will be as much as we  
21 gave you on Monday. Cannot go into the  
22 confidential. Accusatory language in  
23 request for information that is  
24 unlawful for me to provide, you will  
25 not be provided. She is accusing us of  
26 not responding to crimes; we don't  
27 respond to Twitter. She needs to  
28 report any threats. Was reported to

1                   Stephine Lemieux. Encourage the board  
2                   to not ask questions which cannot be  
3                   answered - operationally."

4                   So I want to ask you a few questions about that.  
5 It sounds like that was part of your exchange with Chair Deans  
6 on February 11. What did you mean by, "Going to do like we did  
7 on Monday, minimum level"? Is this -- are you referring to the  
8 amount of information that you're going to give her?

9                   **MR. PETER SLOLY:** I'm going to be consistent with  
10 what we've been doing all along. We're not going to be changing  
11 and deviating from that.

12                  **MS. NATALIA RODRIGUEZ:** So "minimum level"?

13                  **MR. PETER SLOLY:** Well, I don't know what that --  
14 what that means. And I know these are my scribe note. We're  
15 going to be consistent with what we did on Monday is the  
16 substantive theme that I'm trying to relay here.

17                  **MS. NATALIA RODRIGUEZ:** And when you -- just to  
18 go up a little bit to the first part of that exchange. So when  
19 you say, "Cannot and won't be drawn into what I cannot lawfully  
20 provide, i.e., staffing numbers, what the plans are," you're  
21 indicating there that the board is not entitled to those, right,  
22 staffing numbers and what the plans are?

23                  **MR. PETER SLOLY:** Detailed plans, detailed  
24 staffing numbers, how many we're going to have on this shift,  
25 that shift, in public meeting and documents, those are  
26 problematic questions.

27                  **MS. NATALIA RODRIGUEZ:** Why is that?

28                  **MR. PETER SLOLY:** For all the reasons that have

1 been explained before. We're just -- it's -- this was a unique  
2 event, that's for sure, but the types of questions we were  
3 getting repeatedly, over and over and over again; "What is the  
4 plan to end this? Like, I'm looking out my window now. I can't  
5 see a police officer out there."

6           Unfortunately, these were the types of questions  
7 that just couldn't be answered and were taking up hours of our  
8 time, literally, at these meetings.

9           **MS. NATALIA RODRIGUEZ:** And then you say, "Cannot  
10 go into the confidential." *In camera* would have allowed you to  
11 go into the confidential.

12           **MR. PETER SLOLY:** I don't think I'm referring to  
13 *in-camera* there. I cannot go into the confidential elements of  
14 what we're doing, I think is what I was trying to say. I would  
15 have said *in camera*.

16           **MS. NATALIA RODRIGUEZ:** Right. But my question  
17 is; can't you get into confidential matters *in camera*?

18           **MR. PETER SLOLY:** Yes, and I think at the  
19 previous meeting -- what's the date of this?

20           **MS. NATALIA RODRIGUEZ:** February 11<sup>th</sup>.

21           **MR. PETER SLOLY:** Right. At the previous  
22 meeting, I think I'd urged them at least three or four separate  
23 times in the February 5<sup>th</sup> meeting, "Let's go *in camera*."

24           **MS. NATALIA RODRIGUEZ:** Okay. So you are saying  
25 you can give confidential information as long as it's *in camera*.

26           **MR. PETER SLOLY:** I can give more information *in*  
27 *camera*. I wasn't, at that point, committing to give everything  
28 that I was being asked, but I certainly could give more

1 information *in camera*.

2 **MS. NATALIA RODRIGUEZ:** Okay. And what did you  
3 mean -- what did you understand to be unlawful for you to  
4 provide in terms of information, and what made it unlawful?

5 **MR. PETER SLOLY:** Probably more loose language.  
6 I don't know if it would have meant unlawful, but I certainly  
7 wouldn't be giving -- there are unlawful information around  
8 human resources' things, conduct information that wouldn't  
9 necessarily be lawful for me to provide but I'm not sure what  
10 the actual reference there is.

11 **MS. NATALIA RODRIGUEZ:** In your view, as you sit  
12 here today, is there any information that you lawfully cannot  
13 provide an oversight board?

14 **MR. PETER SLOLY:** I'm sure that there would be  
15 something that would allow for that to happen. I'm not sure I  
16 could give a member's blood type or something like that, but --  
17 there might be some limits on that, but I think in general, I  
18 can share the information with the organization.

19 **MS. NATALIA RODRIGUEZ:** Generally, the Board is  
20 entitled to any information ---

21 **MR. PETER SLOLY:** Yeah.

22 **MS. NATALIA RODRIGUEZ:** --- they need in order to  
23 ---

24 **MR. PETER SLOLY:** There may be some restrictions  
25 that I'm not an expert on privacy rights to be able to say that  
26 there's health information that we would have in the records of  
27 the Ottawa Police Service, that relates to a member's  
28 psychological assessment that I could hand in complete free form

1 to the Board.

2 **MS. NATALIA RODRIGUEZ:** Right. But I mean, the  
3 Board, as you know, takes an oath of confidentiality, right?

4 **MR. PETER SLOLY:** I know that.

5 **MS. NATALIA RODRIGUEZ:** Right.

6 **MR. PETER SLOLY:** And they have broken that at  
7 least on one occasion during my tenure. So that oath of  
8 confidentiality doesn't mean that there aren't problems with the  
9 Board's ability to maintain its oath of confidentiality.

10 **MS. NATALIA RODRIGUEZ:** Right. And I guess what  
11 I'm saying is that whatever Board -- issues the Board may have  
12 does not alleviate your responsibility to provide information  
13 that the ---

14 **MR. PETER SLOLY:** No.

15 **MS. NATALIA RODRIGUEZ:** --- Board needs, right?

16 **MR. PETER SLOLY:** You're right, but it does cause  
17 me to have to be very careful under the conditions that I do it,  
18 and this was a national security event.

19 **MS. NATALIA RODRIGUEZ:** So you would agree with  
20 me, then, that under the *Police Services Act*, there's no  
21 restriction on the information that can be provided, right?

22 **MR. PETER SLOLY:** Subject to other Acts and  
23 legislation, I would agree with you.

24 **MS. NATALIA RODRIGUEZ:** Sure. And so right now,  
25 there's nothing specifically that you can point me to to say it  
26 would be -- it's unlawful for me to provide this type of  
27 information, right?

28 **MR. PETER SLOLY:** Yes.

1                   **MS. NATALIA RODRIGUEZ:** Now, my understanding is  
2 that during these events the Board did not issue any formal  
3 directions to you, as it can sometimes do under the *Police*  
4 *Services Act*.

5                   **MR. PETER SLOLY:** It did issue a direction to me  
6 to provide the staffing numbers on the February 5<sup>th</sup> meeting.

7                   **MS. NATALIA RODRIGUEZ:** Okay. And that was a  
8 formal direction from the Board?

9                   **MR. PETER SLOLY:** Yes.

10                  **MS. NATALIA RODRIGUEZ:** Okay. So aside from  
11 that, did the Board ever specifically direct you to provide more  
12 information, as a direction?

13                  **MR. PETER SLOLY:** I don't recall now.

14                  **MS. NATALIA RODRIGUEZ:** Okay. Now, had they  
15 specifically directed you to provide them with a copy of the  
16 plan once it was then formulated, that 3.0 that we hear about,  
17 would that have been provided to the Board?

18                  **MR. PETER SLOLY:** If it was a formal direction, I  
19 probably would have to get consultation with my general counsel,  
20 and then assuming that there was no prohibition, we probably  
21 would have provided what we could, and that would largely be a  
22 heavily redacted document.

23                  **MS. NATALIA RODRIGUEZ:** Okay. Now, we've heard  
24 from some councillors that they were concerned about the ability  
25 of OPS to police other areas of the city was compromised during  
26 the convoy because all of the resources were concentrated in the  
27 downtown area. You're aware of those concerns?

28                  **MR. PETER SLOLY:** Yes.

1                   **MS. NATALIA RODRIGUEZ:** So I want to take you to  
2 the Morden Report, COM00000616. And we've talked before about  
3 the Morden Report, and I know you're very familiar with it.

4                   So we'll go to page 37.

5                   **MR. PETER SLOLY:** Just for clarity, I read it  
6 probably 12 years ago, but I am familiar.

7                   **MS. NATALIA RODRIGUEZ:** Okay. And it's the  
8 independent review into the events of the G20, for those who may  
9 not be familiar, and it's often referred to as the Morden  
10 Report; it was authored in 2012.

11                   And if we go to Recommendation 22:

12                   "The Board should review the Toronto  
13 Police Service's continuity of service  
14 [plan] for major policing events.  
15 Where there is a large event that may  
16 impact upon the...Service's ability to  
17 deliver regular policing officers in  
18 [in this case] Toronto, the Board  
19 should consult with the Chief of Police  
20 concerning how continuity of service  
21 can be achieved. The Board should be  
22 provided with any plans developed by  
23 the Toronto Police Service to aid in  
24 the consultation."

25                   And so I wanted to ask whether the Board was ever  
26 -- our Board, the Ottawa Police Services Board, was ever  
27 provided with plans with respect to the continuity of service in  
28 areas outside of the downtown core?

1           **MR. PETER SLOLY:** They didn't request any  
2 continuity plans, but we briefed them on our ability to maintain  
3 business across the rest of the -- police services across the  
4 rest of the municipality while we're dealing with the incident  
5 Command as well.

6           **MS. NATALIA RODRIGUEZ:** Okay. So they didn't  
7 receive any plans, but informal briefing explaining what the  
8 plan was, essentially?

9           **MR. PETER SLOLY:** Yes.

10          **MS. NATALIA RODRIGUEZ:** Okay. All right. I want  
11 to turn now to negotiations with the City and I think you're  
12 aware, maybe you can explain whether you were aware, that on  
13 February 7<sup>th</sup> some protesters asked to meet with the City Manager  
14 in exchange for facilitating a move from the Rideau and Sussex  
15 intersection to Wellington. Were you aware of that at that  
16 time?

17          **MR. PETER SLOLY:** I was not aware of it. I  
18 became aware of some level of PLT-related negotiations happening  
19 around that location. That came up through Supt. Patterson and  
20 Acting Deputy Chief Ferguson at a briefing.

21          **MS. NATALIA RODRIGUEZ:** So my understanding is  
22 that meeting between a City Manager and the protester in  
23 question was Mr. Marazzo, took place on February 8<sup>th</sup>, but then  
24 the move from Rideau and Sussex to Wellington never happened.  
25 And according to Supt. Drummond, who was here on Wednesday, he  
26 said that the move had not been approved, and I said, "By whom?"  
27 and he indicated that it had not been approved by Supt.  
28 Patterson or by yourself as well.



1           So I just want to understand why that move would  
2 not have been approved.

3           **MR. PETER SLOLY:** That's a Supt. Patterson  
4 decision. I gave no decision on that.

5           **MS. NATALIA RODRIGUEZ:** Okay. And earlier than  
6 the 8<sup>th</sup>, my understanding is there was also a potential move from  
7 the Rideau and Sussex, again to Wellington, that had been  
8 negotiated by PLT after the January -- the first weekend, so it  
9 would have been around the Monday after that first weekend, the  
10 31<sup>st</sup>. There was a PLT-negotiated potential move from Rideau and  
11 Sussex to Wellington at that earlier time. And according to  
12 Insp. Lucas, he said that that had been negotiated, but that the  
13 direction came from you to prevent that move from happening. So  
14 I wanted to ask about your ---

15           **MR. PETER SLOLY:** I gave no directions in regards  
16 to PLT actions.

17           **MS. NATALIA RODRIGUEZ:** Okay. And were you  
18 generally aware that the Parliamentary Protective Service had  
19 concerns about moving more trucks onto Wellington after that  
20 first weekend?

21           **MR. PETER SLOLY:** My recollection of the first  
22 time hearing that directly was when -- I might get his rank  
23 wrong but Larry Brookson, who was the head of the Parliamentary  
24 Protection Services, raised that, I think on the weekend of the  
25 13<sup>th</sup>, 14<sup>t</sup>, with me directly.

26           **MS. NATALIA RODRIGUEZ:** Okay. And when you first  
27 learned of negotiations between the City of Ottawa and  
28 protesters, I believe was around the 12<sup>th</sup> of February.

1                   **MR. PETER SLOLY:** Yeah.

2                   **MS. NATALIA RODRIGUEZ:** And is it fair to say  
3 that you were generally receptive to the Mayor's office  
4 negotiating with protesters to come up with some sort of  
5 negotiated solution?

6                   **MR. PETER SLOLY:** On one -- well, one, maybe two  
7 singular -- two caveats; it cannot direct policing operations,  
8 and it cannot run counter to the operational plan that was under  
9 the control of the Incident Command.

10                  **MS. NATALIA RODRIGUEZ:** Okay. So on February  
11 12<sup>th</sup>, my understanding is you received a call from Steve  
12 Kanellakos advising you that over the last 24 hours there had  
13 been some discussions, and then you had a meeting after that  
14 with Deputy Chief Bell and Ms. Haneault to inform them of that  
15 call. And my understanding is that Mr. Kanellakos had indicated  
16 to you that these discussions were confidential because they  
17 were ongoing, they hadn't been finalized yet.

18                  And my understanding is that in a subsequent  
19 meeting with Deputy Chief Bell and Ms. Huneault, you asked  
20 Deputy Chief Bell to also keep that information confidential;  
21 right? Did you see any -- did you have any concerns about  
22 having to tell him to keep it confidential? Were there any --  
23 do you see any issues with that? The fact that you asked him to  
24 not share that with anybody else?

25                  **MR. PETER SLOLY:** In hindsight, yes. At the  
26 time, I thought it was reasonable.

27                  **MS. NATALIA RODRIGUEZ:** Okay. And you thought it  
28 was reasonably why?

1           **MR. PETER SLOLY:** They were just negotiations  
2 that were ongoing. There hadn't been a final outcome, and at  
3 this point, it didn't have any major impact on our operations --  
4 any impact on our operations.

5           **MS. NATALIA RODRIGUEZ:** And since then, your  
6 view, you're saying, has changed. So what's your view of that  
7 now?

8           **MR. PETER SLOLY:** Probably be one of those areas  
9 I would have wanted to share down one more level into the -- at  
10 least to the event commander.

11           **MS. NATALIA RODRIGUEZ:** Who would have been Supt.  
12 Bernier at the time; right?

13           **MR. PETER SLOLY:** The date, sorry, again?  
14 February?

15           **MS. NATALIA RODRIGUEZ:** Twelfth (12<sup>th</sup>).

16           **MR. PETER SLOLY:** Yes.

17           **MS. NATALIA RODRIGUEZ:** And so with that caveat  
18 that you gave us before about wanting to make sure that these  
19 negotiations fit within the overall plan, informing Supt.  
20 Bernier on the 12<sup>th</sup>, or the earliest that you learned about it,  
21 would have facilitated ensuring that those negotiations meshed  
22 or fit in to the overall plan; right?

23           **MR. PETER SLOLY:** No. It would have given him  
24 situational awareness, but I would have told him, you keep  
25 working on your plan, because this thing may fall apart. We  
26 didn't have the time or the effort to be putting a lot of  
27 resources into planning for something that hadn't been  
28 negotiated and might never happen anyway. So I would have given

1 him for situational awareness, but not to give him more work to  
2 be done around it.

3 **MS. NATALIA RODRIGUEZ:** Right. But for example,  
4 he could have contacted the Mayor's office and put some  
5 parameters around the negotiations or ---

6 **MR. PETER SLOLY:** No, because -- sorry. I  
7 shouldn't interrupt you. I apologize.

8 **MS. NATALIA RODRIGUEZ:** No, go ahead.

9 **MR. PETER SLOLY:** Please finish your question,  
10 because I want to make sure I answer properly.

11 **MS. NATALIA RODRIGUEZ:** That was the question.

12 **MR. PETER SLOLY:** I would not have wanted anybody  
13 in my organization to then get involved directly in the  
14 negotiation with -- between the City, and I believe it's Mr.  
15 French, and the convoy organizers. I didn't want the Ottawa  
16 Police Service to be directly involved in that negotiation.

17 **MS. NATALIA RODRIGUEZ:** Why is that?

18 **MR. PETER SLOLY:** It was a political negotiation.

19 **MS. NATALIA RODRIGUEZ:** But again, if it's being  
20 done separately from the OPS' plans, there's the potential of  
21 conflict; isn't there?

22 **MR. PETER SLOLY:** And if there was, I would have  
23 defaulted to the OPS plans.

24 **MS. NATALIA RODRIGUEZ:** Right. But if something  
25 is negotiated with OPS input, can OPS then prevent it from  
26 moving forward?

27 **MR. PETER SLOLY:** That was the condition I gave  
28 to Steve Kanellakos when he had called me.

1                   **MS. NATALIA RODRIGUEZ:** Okay. So you wanted to  
2 ensure then that the City's negotiations was completely  
3 independent from the OPS' plan?

4                   **MR. PETER SLOLY:** Yes.

5                   **MS. NATALIA RODRIGUEZ:** Okay. Despite the fact  
6 that this was a police-led operation and the police was the lead  
7 agency in the response?

8                   **MR. PETER SLOLY:** Yes.

9                   **MS. NATALIA RODRIGUEZ:** Okay. And then the  
10 February 13<sup>th</sup>, that morning, you got a call from Steve Kanellakos  
11 confirming that there had been an agreement reached, letters  
12 would be exchanged, et cetera; right?

13                   I believe then at noon, there was a meeting with  
14 city officials called by Steve Kanellakos, and the people who  
15 were on that call were Steve Kanellakos, yourself, Deputy Chief  
16 Bell, and Acting Deputy Chief Ferguson, and a subsequent meeting  
17 then took place to inform a broader group of your team; right?

18                   Now, I understand that day, shortly after 1:00  
19 p.m., you called OPP Commissioner Carrigue to update him on the  
20 negotiations with the City; right?

21                   **MR. PETER SLOLY:** Yes.

22                   **MS. NATALIA RODRIGUEZ:** So he knew, as of  
23 February 13<sup>th</sup>, at around 1:00 p.m.?

24                   **MR. PETER SLOLY:** I believe that's the timing,  
25 yes.

26                   **MS. NATALIA RODRIGUEZ:** On that call, did he  
27 express any concerns to you?

28                   **MR. PETER SLOLY:** I actually don't have an

1 independent recollection.

2 **MS. NATALIA RODRIGUEZ:** Okay.

3 **MR. PETER SLOLY:** But I don't recall anything  
4 being substantively discussed.

5 **MS. NATALIA RODRIGUEZ:** Okay. And Drummond  
6 testified, Supt. Drummond, rather, testified that at that  
7 subsequent meeting with the broader team was the first time that  
8 he learned about those negotiations and he said everybody on the  
9 call was cautiously optimistic. Is that -- does that accord  
10 with your ---

11 **MR. PETER SLOLY:** With my general recollection,  
12 yes.

13 **MS. NATALIA RODRIGUEZ:** And then after that  
14 meeting, you called RCMP Commissioner Brenda Lucki, and she said  
15 she was aware of the negotiations. Did she express any concerns  
16 to you at that time?

17 **MR. PETER SLOLY:** I don't recall any. Again,  
18 sorry, I don't have my notes and I don't have a clear  
19 independent recollection.

20 **MS. NATALIA RODRIGUEZ:** Okay. And my  
21 understanding is significant resources were required to carry  
22 out OPS' assistance to implementing that deal?

23 **MR. PETER SLOLY:** I don't know. I just wouldn't  
24 know the level of lift, but I suspect it would be. We didn't  
25 have a lot of resources to spare, so any amount of resources  
26 could be considered significant.

27 **MS. NATALIA RODRIGUEZ:** Okay. And so if I take  
28 you now to just the next day, which is February 14, I'm going to

1 take you to OPS00014566. And these are your notes, again. And  
2 I'll take you to page 8.

3 And at 1631 -- so just to give you some context,  
4 the trucks started moving at 1:00 p.m. on this day. It was  
5 decided that that evening, on the 13<sup>th</sup>, the night before, Supt.  
6 Drummond went and coordinated kind of the details, and the  
7 following morning, it was to start -- it didn't start until 1:00  
8 p.m. And this is now at 4:30 p.m. that same day. So trucks  
9 have been moving for the last three hours, give or take.

10 So you have a Teams call with Brookson. So maybe  
11 you can explain who Brookson is?

12 **MR. PETER SLOLY:** It's Larry Brookson, who was  
13 leading the Parliamentary Protection Services. And I apologize,  
14 I don't know his -- I can't remember his rank or his title.

15 **MS. NATALIA RODRIGUEZ:** Yes. And I'm not sure  
16 either, so we can go with Mr. Brookson.

17 **MR. PETER SLOLY:** Okay.

18 **MS. NATALIA RODRIGUEZ:** He said:

19 "...trying to get understand the meeting to  
20 completely fill up Welling St."

21 And then you say:

22 "Chief briefed his team. Understood that  
23 the intersect team would then brief  
24 everyone including PPS"

25 So is it fair to say that you had reached out to  
26 the OPP Commissioner and to the RCMP Commissioner, but you  
27 didn't reach out to PPS and he's essentially calling you out on  
28 it and saying, "Why didn't you let me know?" Is that

1 essentially what's happening here?

2 **MR. PETER SLOLY:** No, that's not how I took it.

3 **MS. NATALIA RODRIGUEZ:** Okay. So maybe just  
4 explain that discussion?

5 **MR. PETER SLOLY:** He's concerned about not being  
6 aware of it, which I can appreciate fully. But I'm explaining  
7 that the Major Incident Commander and Event Commander would be  
8 able to brief all of our partners in the NCRR and everybody who  
9 is contributing at that point, an integrated operation about  
10 what was taking place that day, and that my understanding was  
11 PPS was part of that Intersect team and would have received that  
12 briefing. I didn't get the impression that Larry Brookson was  
13 calling me out, or the Ottawa Police Service out.

14 **MS. NATALIA RODRIGUEZ:** Okay. And if we just go  
15 down, there's more to the discussion.

16 So again, these are point form notes. It's hard  
17 to really get a good sense for what's being kind of conveyed  
18 here, but maybe you can review those point form notes and give  
19 us a better sense of what transpired in that discussion?

20 And specifically, I want to understand the  
21 references to:

22 "...does city usually direct police on how  
23 this goes"

24 **MR. PETER SLOLY:** I don't what that reference is.  
25 I looked at that myself. I don't know -- it obviously would be  
26 from Brookson, sorry, Larry Brookson, ---

27 **MS. NATALIA RODRIGUEZ:** Okay.

28 **MR. PETER SLOLY:** --- Mr. Brookson.



1                   **MS. NATALIA RODRIGUEZ:** Yeah.

2                   **MR. PETER SLOLY:** But again, it's hard to -- like  
3 you said, it's back and forth sort of almost real time attempt  
4 to get the full conversation.

5                   **MS. NATALIA RODRIGUEZ:** And then the note:

6                                 "For an administrator to reach-out on  
7                                 their own and then permit the vechils  
8                                 [sic] to sardine in on Wellington st.  
9                                 [sic] This was purely political"

10                   What was the discussion around that point?

11                   **MR. PETER SLOLY:** I mean, I remember Mr. Brookson  
12 expressing his concern around the politics, and as I've said,  
13 there was a lot of politics going on all around this at so many  
14 levels. But I don't know who he's referring to as "an  
15 administrator".

16                   **MS. NATALIA RODRIGUEZ:** So I just want to confirm  
17 that by this time, certainly he's telling you that trucks have  
18 moved on to Wellington. So you knew by this time; correct?

19                   **MR. PETER SLOLY:** I understood by this time. I  
20 still, to this day, have some confusion as to that portion of  
21 things, but clearly by this time, I would have known that trucks  
22 were on Wellington Street.

23                   **MS. NATALIA RODRIGUEZ:** Okay. And your witness  
24 statement says you didn't know, but I think we can agree that  
25 you did know. This is probably ---

26                   **MR. PETER SLOLY:** Yes.

27                   **MS. NATALIA RODRIGUEZ:** Okay. And then my  
28 understanding is at 1701, so you have this discussion with him,

1 you're not able to give me too much more than what's there, it  
2 sounds like, based on your recollection.

3                   If we could go to page -- is this still page 9?  
4 Yeah, 1701. So it looks like there's a demo briefing call at  
5 5:01. On the second bullet we see "Trish", that's Acting Deputy  
6 Chief Ferguson:

7                                 "...[l]ots of Convo with Carson at NOK,  
8                                 PPS not happy with trucks on  
9                                 Wellington."

10                   And at the bottom it says, "Had to pivot due to  
11 new". Do you have any sense -- it seems to be some words  
12 missing at the end of that. Do you have any sense for what  
13 that's referring to?

14                   **MR. PETER SLOLY:** No, I don't. Sorry.

15                   **MS. NATALIA RODRIGUEZ:** Okay. And if we go to  
16 page 10, the bullet before the redaction, "We need" -- or --  
17 right, the last -- the first redacted portion, the bullet  
18 before:

19                                 "We need some significant legal advice  
20                                 regarding the Mayor's position that  
21                                 they can be on Wellington."

22                   Can you just explain what that refers to?

23                   **MR. PETER SLOLY:** I don't know. I apologise.

24                   **MS. NATALIA RODRIGUEZ:** Okay. Are you able to  
25 give us any insight into what was the issue that was concerning?

26                   **MR. PETER SLOLY:** It seems to be all a discussion  
27 around the relative sequence -- the sequence of events that took  
28 place throughout the day, the relative efficacy of it,

1 challenges experienced, logistical staffing, there is PLTs  
2 referenced there. So it's a general discussion that seems to be  
3 going on. I'm not sure who's leading and who is making what  
4 points.

5 **MS. NATALIA RODRIGUEZ:** So this is the day before  
6 you resigned at 5:00 p.m. So I don't know if that helps to  
7 situate you in the timeline of events and if you have a  
8 recollection of this meeting. It would've been one of your  
9 final meetings.

10 **MR. PETER SLOLY:** No, it's just another busy  
11 briefing on a very difficult period of time.

12 **MS. NATALIA RODRIGUEZ:** And we know that after  
13 this meeting, certainly by nightfall on that day, no more trucks  
14 were relocated onto Wellington, and that kind of ended the  
15 facilitation of trucks onto Wellington. Do you have any sense  
16 for why -- what was the reason behind OPS no longer supporting  
17 the movement of trucks onto Wellington?

18 **MR. PETER SLOLY:** I don't. I mean, I've --  
19 subsequent through disclosure I've seen things, so I don't know  
20 if that makes my opinion valid at this point, but I understand -  
21 - my understanding is, without getting into any more detail than  
22 that, is that the Event Commander made a decision to discontinue  
23 the Operations. And the only thing I can say to that is that  
24 would be entirely within his purview. That was the caveat I  
25 gave to City Manager Kanellakos. I said "If at any point that  
26 the Operations around the negotiation cross purposes with the  
27 Operational Plan" that we would default to our Operational Plan.

28 **MS. NATALIA RODRIGUEZ:** Okay. So you can't tell

1 us why.

2 **MR. PETER SLOLY:** I don't know.

3 **MS. NATALIA RODRIGUEZ:** Okay. So just quickly,  
4 last time we spoke in our interview, I asked you about kind of  
5 lessons learned. We talked a little bit about that today. You  
6 spoke with Mr. Au about that.

7 And I asked you if in your kind of reflection  
8 since these events you had thought about anything you could have  
9 done differently as Chief of Police. And at that time, you  
10 mentioned, you know, clarifying your comment about there may not  
11 be a policing solution, which I understand you've done that now,  
12 but nothing really else came to mind.

13 And so I wanted to ask now, having had the  
14 benefit of hearing your former colleagues, going through  
15 documents in preparation for your evidence today, whether there  
16 is anything else that you would add to that?

17 **MR. PETER SLOLY:** Around recommendations going  
18 forward or lessons learned in...

19 **MS. NATALIA RODRIGUEZ:** Reflections on what you  
20 may have done differently or what you would do differently next  
21 time if you were in the same position, what could you have done  
22 differently as Chief of Police.

23 **MR. PETER SLOLY:** I think I did provide some list  
24 of recommendations for the Commission to consider in my  
25 statement. I'll trust that that will be followed up as the  
26 Commissioner determines.

27 I was about to say we have a Board liaison person  
28 because we talked about the Board quite a bit, but John

1 Steinbach was the designated Board liaison person at that  
2 position before I even arrived as Chief.

3 I'm just thinking through sort of top-down from  
4 Board relationship. Intersect was there. There was a  
5 recommendation around funding and investing in Intersect to  
6 create more -- deconflict some of the problems we've learned.

7 I -- honestly, the list of recommendations that  
8 I've provided are the substantive reviews of what needed to be  
9 in a better level to address some of the structural deficits  
10 that I've talked about. And I've tried to provide both  
11 national, well, national, provincial in terms of *Police Act*  
12 legislation, and local in terms of the unique aspects of the NCR  
13 region within my recommendations. I can't think of anything  
14 else at this point.

15 **MS. NATALIA RODRIGUEZ:** So I understand kind of  
16 at a systemic level, but I'm asking more on a personal level,  
17 something you could have done differently as Chief of Police.  
18 And if nothing comes to mind that's fine, that's the answer, but  
19 I wanted to give you that opportunity.

20 **MR. PETER SLOLY:** I think the broadest statement  
21 around understanding how to be able to be even more resilient  
22 during that level of time. I think there's a whole new level of  
23 science around sleep and wellness that probably executive  
24 leaders who face these types of sustained levels of crisis and  
25 pressure just need to understand how to develop a level of  
26 physical and emotional and psychological resilience to get  
27 through these things.

28 How do you -- I mean, we talk about wellness for

1 frontline officers and building resilience there. It's -- and I  
2 think that would be probably just a personal lesson learned,  
3 there just never is enough sleep. I suspect people on this  
4 Commission are sleep deprived as well, and not optimal in terms  
5 of what they're doing.

6 So I mean, it's just a human condition.

7 **MS. NATALIA RODRIGUEZ:** I don't know what you're  
8 talking about.

9 **MR. PETER SLOLY:** Well, I know for my legal team,  
10 and I'm looking at sleepy eyes all around me.

11 So -- I mean, I said it. I think it came up in a  
12 comment earlier on when I was talking to Chair Deans, like,  
13 we're just human beings, and none of us are supermen or  
14 superwomen, and this was a super difficult situation. And  
15 mistakes were made, moments were lost, relationships were  
16 strained, meetings didn't go the way they were intended to,  
17 language was not precise enough, assumptions were made, rumours  
18 were passed around. Just -- it's just a human condition.  
19 Systems are built by human beings, policies are designed by  
20 human beings, institutions are just human institutions.

21 And I said it before on the Standing Committee,  
22 someone asked "Did the Ottawa Police Service fail?" Canada was  
23 exposed in these events, our institutions were exposed, our  
24 systems were exposed, and our leaders were exposed, and our  
25 frontline members were exposed. Probably worst overall our  
26 communities were exposed. We just got to get it better the next  
27 time. I'm fully committed to doing that, that's why I'm here.

28 **MS. NATALIA RODRIGUEZ:** Thank you. And you

1 mentioned your recommendations to the Commission. I understand  
2 you have spoken to some of those. But I wanted to give the  
3 opportunity to highlight some of the other ones that perhaps we  
4 haven't had a chance to get to, if that's something you would  
5 like to do.

6 **MR. PETER SLOLY:** I think I'll leave it with the  
7 Commission to see those areas, and I'll make myself available,  
8 Commissioner, to you, and your team at any point to expand on  
9 that. I think each one of my recommendations could probably  
10 fill another 20 pages or so, but I just think for the time here  
11 I'll leave it there and make myself available to you.

12 **MS. NATALIA RODRIGUEZ:** Thank you very much.  
13 Those are my questions for you.

14 **MR. PETER SLOLY:** Thank you.

15 **COMMISSIONER ROULEAU:** Okay. Well, we're  
16 finishing a little early. I'm not sure if we want to start  
17 cross-examination, but I promised we wouldn't, so I'm going to  
18 adjourn.

19 I just want to raise, if there are any concerns,  
20 of course as was mentioned, this has been a very tight schedule,  
21 a very -- a lot of documents, a lot of movement, everybody in my  
22 view has cooperated very well. But if there's anything that is  
23 of concern to the Commission, please don't hesitate to raise it,  
24 either with Commission Counsel or directly with me. Because  
25 ultimately, I think we know it's been stressful, but I think  
26 we're doing a not bad job. Certainly the -- I'm very impressed  
27 with everyone's work so far.


28 So thank you, and have a great weekend.

1                   **THE REGISTRAR:** The Commission is adjourned. La  
2 Commission est ajournée.  
3 --- Upon adjourning at 6:07 p.m.  
4

5                   **C E R T I F I C A T I O N**  
6

7 I, Wendy Clements, a certified court reporter, hereby certify  
8 the foregoing pages to be an accurate transcription of my  
9 notes/records to the best of my skill and ability, and I so  
10 swear.

11  
12 Je, Wendy Clements, une sténographe officielle, certifie que les  
13 pages ci-hautes sont une transcription conforme de mes  
14 notes/enregistrements au meilleur de mes capacités, et je le  
15 jure.

16  
17 

18 Wendy Clements  
19