



**PUBLIC ORDER  
EMERGENCY  
COMMISSION**

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

**Public Hearing**

**Audience publique**

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

**VOLUME 15**

**Held at :**

Library and Archives Canada  
Bambrick Room  
395 Wellington Street  
Ottawa, Ontario  
K1A 0N4

Wednesday, November 2, 2022

**Tenue à:**

Bibliothèque et Archives Canada  
Salle Bambrick  
395, rue Wellington  
Ottawa, Ontario  
K1A 0N4

Le mercredi 2 novembre 2022

**INTERNATIONAL REPORTING INC.**

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### III

## Appearances / Comparutions

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Government of Alberta

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Mr. Peter Buijs  
Mr. Shaheer Meenai

City of Ottawa

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  
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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

--- Upon commencing on Monday, November 2, 2022 at 9:34 a.m.

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

**COMMISSIONER ROULEAU:** Good morning. Bonjour. I  
apologize for the slight delay. Okay.

**MR. JEFFREY LEON:** Good morning, Commissioner.

**COMMISSIONER ROULEAU:** Good morning.

**MR. JEFFREY LEON:** Jeffrey Leon, co-lead,  
Commission counsel. The next witness will be Keith Wilson.

**THE REGISTRAR:** Mr. Wilson, will you swear on a  
religious document or do you wish to affirm?

**MR. KEITH WILSON:** I'll swear on the Bible.

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

**MR. KEITH WILSON:** Ian Keith Wilson, w-i-l-s-o-n.

**--- MR. KEITH WILSON, Sworn:**

**--- EXAMINATION IN-CHIEF BY MR. JEFFREY LEON:**

**MR. JEFFREY LEON:** Good morning, Mr. Wilson.

**MR. KEITH WILSON:** Good morning.

**MR. JEFFREY LEON:** I'd like to begin by getting  
some information on your background. I understand you're from  
Edmonton, Alberta?

**MR. KEITH WILSON:** That's right. I'm originally  
from Burlington, Ontario. I spent the first part of my life  
here in Ontario and the balance of my life out west.

**MR. JEFFREY LEON:** You and I did it the opposite

1 ways. And do you practice law in Edmonton?

2 **MR. KEITH WILSON:** That's correct.

3 **MR. JEFFREY LEON:** For how long?

4 **MR. KEITH WILSON:** I think I'm 27, 28 years at  
5 the Bar now.

6 **MR. JEFFREY LEON:** And you're a King's Counsel?

7 **MR. KEITH WILSON:** That's correct.

8 **MR. JEFFREY LEON:** And can you describe for the  
9 Commission the nature of your practice?

10 **MR. KEITH WILSON:** I've typically, throughout the  
11 course of my career, dealt with people who are up against bigger  
12 forces than them. I have represented many landowners, and  
13 farmers, and ranches in Alberta in disputes with oil companies,  
14 but I've also -- much of my practice has been focused on helping  
15 people when governments, in their mind, has gone to far,  
16 affecting their life, or their business, or their livelihood,  
17 and so I've done a lot of judicial review, and administrative  
18 law, and tribunal work.

19 **MR. JEFFREY LEON:** Thank you. And have you -- I  
20 take it you've appeared before all levels of Alberta Courts and  
21 many regulatory tribunals?

22 **MR. KEITH WILSON:** That's right.

23 **MR. JEFFREY LEON:** And can I ask the clerk to  
24 bring up WTS00000058? You attended an interview with me and my  
25 colleagues on October 20, 2022?

26 **MR. KEITH WILSON:** That's correct.

27 **MR. JEFFREY LEON:** And you were provided with a  
28 draft summary that was prepared by Commission counsel?



1           **MR. KEITH WILSON:** That's right.

2           **MR. JEFFREY LEON:** And you had an opportunity to  
3 review that summary, comment on it, and then you were provided  
4 with an amended version which you also reviewed?

5           **MR. KEITH WILSON:** That's right.

6           **MR. JEFFREY LEON:** And I'm showing you on the  
7 screen what we've -- an interview summary; do you recognize this  
8 as your interview summary?

9           **MR. KEITH WILSON:** I do.

10          **MR. JEFFREY LEON:** And do you have any changes or  
11 corrections you want to make this morning?

12          **MR. KEITH WILSON:** No, other than, as we've heard  
13 from so many witnesses, there were so many events occurring and  
14 it was some time ago, but to the best of my recollection, this  
15 is accurate.

16          **MR. JEFFREY LEON:** Thank you.

17          **COMMISSIONER ROULEAU:** If I can just interrupt,  
18 you have a tendency to speak rapidly. So if you could try and  
19 moderate it, that would be helpful. That's for the  
20 interpreters, obviously.

21          **MR. KEITH WILSON:** Thank you, Commissioner.

22          **MR. JEFFREY LEON:** And I'll be referring to your  
23 interview summary from time to time but if at any time you need  
24 to refer to it, you just let me know and we can bring it up.

25          **MR. KEITH WILSON:** Thank you.

26          **MR. JEFFREY LEON:** Now, I'd like to ask you some  
27 questions about how you became involved with the Freedom Convoy.  
28 I understand that you were contacted by the Justice Centre for

1 Constitutional Freedoms on February 1, 2022.

2 **MR. KEITH WILSON:** Yes.

3 **MR. JEFFREY LEON:** And at that time, you were  
4 acting on another matter through the JCCF?

5 **MR. KEITH WILSON:** That's correct.

6 **MR. JEFFREY LEON:** And what was that retainer?

7 **MR. KEITH WILSON:** The -- what happened was, in  
8 the fall of 2021, my wife, who is a retired nurse -- we've been  
9 married forever and have four kids and she became very concerned  
10 about what she was seeing in terms of government policy, health  
11 policy, felt that things were badly going awry, and she did  
12 something she's never done before where she encouraged me to get  
13 involved and take a case. She's normally the gatekeeper because  
14 I tend to take too many cases. And Ms. Chipiuk, who I'd  
15 practiced law with in the past on other cases, approached me and  
16 asked me if I'd be willing to take a case at the Justice Centre.  
17 They needed senior litigation counsel. I agreed. I -- they  
18 told me I could pick whichever case I would like and I wanted to  
19 -- I had been studying the travel mandates and I thought they  
20 were all ultra vires the *Aeronautics Act* and I wanted -- and  
21 obviously breaching Charter and so I agreed to lead that case  
22 with Former Premier Brian Peckford as your lead applicant.

23 **MR. JEFFREY LEON:** And that case is still going  
24 on?

25 **MR. KEITH WILSON:** We just got struck on mootness  
26 and we're appealing that to the Federal Court of Appeal.

27 **MR. JEFFREY LEON:** When was that?

28 **MR. KEITH WILSON:** We got struck not last

1 Thursday, the Thursday before, while I was here. And then that  
2 led to -- on the 1<sup>st</sup> of February, I had a legal-team meeting set  
3 up, noticed some extra people in the Zoom room and let them in,  
4 and I was informed by one of the lawyers who I'd met for the  
5 first time on that Zoom call that the truckers in Ottawa, that  
6 morning, had reached out to the Justice Centre and asked the  
7 Justice Centre if they would provide legal support. The lawyers  
8 on the call told me that they'd assembled a team and they'd  
9 asked me if I would come to Ottawa the next morning and lead  
10 that team, and I agreed.

11 **MR. JEFFREY LEON:** You were able to clear your  
12 schedule that quickly?

13 **MR. KEITH WILSON:** Well, I got spousal consent  
14 very quickly, so that helped tremendously, and yeah, I was.

15 **MR. JEFFREY LEON:** Now, you say there was a team  
16 of four lawyers, I believe, in your statement?

17 **MR. KEITH WILSON:** That's right.

18 **MR. JEFFREY LEON:** And who was on that team?

19 **MR. KEITH WILSON:** Eva Chipiuk.

20 **MR. JEFFREY LEON:** Yes.

21 **MR. KEITH WILSON:** Andre Memauri, Tim Turple, and  
22 Allison Pejovik.

23 **MR. JEFFREY LEON:** And had you been following the  
24 news about what was happening in Ottawa?

25 **MR. KEITH WILSON:** Yeah, I was very fascinated  
26 with how the convoy started to form. I took -- I was amazed at  
27 the rate at which the donations were coming in, just from  
28 following social media and the legacy media as well. And I

1 thought I really want to keep an -- this is prior to February  
2 1<sup>st</sup>, of course, and I thought, "Well, I really want to keep an  
3 eye on this," and I realized probably the easiest way to do that  
4 would be to make a nominal donation and then I would get the  
5 email updates, so I donated \$15. I'm a little embarrassed about  
6 that but just for the purpose of tracking and getting the  
7 regular email updates. I had no idea that a few days after I  
8 made that donation that I would be in Downtown Ottawa.

9 **MR. JEFFREY LEON:** And on a personal level, did  
10 you have a view of what was happening in Ottawa?

11 **MR. KEITH WILSON:** Well, I had a view -- I think  
12 there's two questions there. Obviously, I had grave concerns  
13 about the government's policies and the harm that I'd witnessed  
14 in my own family with our children, with my neighbours, with my  
15 friends, with my colleagues. So, in that context, I have a very  
16 strong view that I think tremendous mistakes were made at a  
17 policy level. But with respect to the convoy, I felt that it  
18 was providing an opportunity for people who were also concerned  
19 to symbolize that concern and demonstrate it.

20 **MR. JEFFREY LEON:** And at that point in time,  
21 what did you understand your retainer to be?

22 **MR. KEITH WILSON:** My instructions were to work  
23 with the leadership group to provide on-the-ground legal  
24 support. One of the things that we thought we would likely be  
25 doing, which we didn't end up having to do, was to obtain an  
26 injunction. We anticipated that we would have to defend  
27 injunctions, provide legal advice as to the types of activities  
28 that they're allowed to do and the things they're not allowed to

1 do. Also, it was clear at that time if you recall -- I  
2 apologize if I'm talking too fast again, sir -- if you recall  
3 that around that time, GoFundMe had publicly announced the  
4 suspension of the fundraising campaign. I was also told at the  
5 time of being engaged that work was underway to set up a not-  
6 for-profit corporation, Canada Corp., to ensure a proper  
7 organizational structure for the administration of the  
8 donations.

9                   Something else that I have done in my background  
10 that proved to be extremely useful, not only in Ottawa but in  
11 the event since, is I've represented not-for-profit groups and  
12 I've represented various industry organizations, so I've dealt  
13 with conflicts and strong personalities on boards of directors  
14 and seen the interpersonal quarrels that can arise, and some of  
15 the groups that I've represented have been comprised of  
16 independent ranchers, and upon arriving in Ottawa, I immediately  
17 realized this person had similarities between independent  
18 Alberta ranchers and independent truckers. So that's some  
19 context.

20                   **MR. JEFFREY LEON:** Okay. So the next day,  
21 February 2nd, you went to Ottawa, and I understand that you went  
22 on a private aircraft?

23                   **MR. KEITH WILSON:** Yes. It was a small bumpy --  
24 I forget the name of it -- but it's a twin prop and we left at  
25 8:00 a.m. on -- we left at 8:00 a.m. on that February 2nd and we  
26 landed in Ottawa at about 10:30. So it was not a luxury  
27 experience. We went up and down many times. We stopped in  
28 Medicine Hat, we stopped in Regina, Saskatoon, Winnipeg, and

1 then Thunder Bay. All the stops were to pick up additional  
2 lawyers and the accountant, or the last one to get fuel.

3 **MR. JEFFREY LEON:** Now, at the time, did you  
4 consider or did you wonder, given the nature of your retainer,  
5 why you were being flown on a private aircraft?

6 **MR. KEITH WILSON:** Because at that time, the  
7 understanding of the interim orders under the *Aeronautics Act* is  
8 that it did not extend to private charter aircraft, and some of  
9 the passengers on that aircraft were unvaccinated, so that was a  
10 way for us to get to Ottawa quickly under the interim order.

11 **MR. JEFFREY LEON:** And did you know at the time  
12 who was paying for the aircraft?

13 **MR. KEITH WILSON:** There was confusion about that  
14 in the same way that there was confusion about -- there was two  
15 other groups that had allegedly made arrangements for us to have  
16 hotel rooms when we arrived, and so the justice centre made a  
17 backup plan to have a third hotel ready, and that's the one we  
18 ended up using.

19 As we were boarding the plane, whoever was  
20 supposedly going to be paying for this charter turned out they  
21 weren't going to pay for the charter, and the justice centre  
22 made the decision to send us anyway, and if necessary, they  
23 would pay for the charter if whoever was going -- who had  
24 originally said they were going to pay for it didn't.

25 **MR. JEFFREY LEON:** And do you know who ultimately  
26 paid for the charter?

27 **MR. KEITH WILSON:** I believe it was -- and I'm  
28 not certain about this -- but I believe it was paid from funds

1 donated through Chris Garrah, this "Adopt a Trucker".

2 **MR. JEFFREY LEON:** Okay. Now, you heard  
3 yesterday Ms. Belton's evidence about a conversation she had  
4 with you regarding disclosure of this flight?

5 **MR. KEITH WILSON:** Disclosure of, sorry?

6 **MR. JEFFREY LEON:** Information about this flight?

7 **MR. KEITH WILSON:** Okay.

8 **MR. JEFFREY LEON:** I believe she said you -- she  
9 was told not to say anything about it?

10 **MR. KEITH WILSON:** No, that's not correct.

11 **MR. JEFFREY LEON:** What do you have to say about  
12 that?

13 **MR. KEITH WILSON:** I had no discussion with Ms.  
14 Belton about this flight. I had no concerns about the flight.  
15 I'm double vaccinated. It wouldn't have mattered what aircraft  
16 I was on.

17 **MR. JEFFREY LEON:** Okay. Now, I'd like to just  
18 pause here for a moment. I know that this point, you're acting  
19 as a lawyer, and to the extent that any of my questions would  
20 require you to disclose privileged information where privilege  
21 has not been waived, would you tell me and not answer?

22 **MR. KEITH WILSON:** I will. And just so  
23 everyone's clear, I do, in July, my clients instructed me to  
24 make myself -- to consider making myself available as a witness,  
25 and granted a waiver with respect to these matters, this  
26 proceeding, and we've subsequently confirmed it in writing to  
27 avoid any confusion that I am here today with a waiver from my  
28 clients with respect to solicitor-client privilege.

1                   **MR. JEFFREY LEON:** And when you say, "your  
2 clients", who did you include in that?

3                   **MR. KEITH WILSON:** The clients include Freedom  
4 Corp., so the -- that's their short name for the full legal name  
5 of the not-for-profit. It includes Tamara Lich, Chris Barber,  
6 Danny Bulford, Tom Marazzo, Sean Tiessen, Miranda Gasior, Joe  
7 Janzen, Dale Enns, and Ryan Mihilewicz, and I believe that's the  
8 full list.

9                   **MR. JEFFREY LEON:** I understand that during the  
10 period you were about to talk to, you were also dealing with  
11 Chad Eros?

12                   **MR. KEITH WILSON:** That's correct.

13                   **MR. JEFFREY LEON:** Was he part of your client  
14 group?

15                   **MR. KEITH WILSON:** He was offered an opportunity  
16 to become a client and did not sign a retainer agreement.

17                   **MR. JEFFREY LEON:** My understanding is he -- his  
18 position is he was a client and that he has not waived  
19 privilege.

20                   **MR. KEITH WILSON:** That's fine, and out an  
21 abundance of caution, I -- we can respect that. I do know that  
22 the absence of a retainer was confirmed by him in writing, so --  
23 to me.

24                   **MR. JEFFREY LEON:** And if at any time you're in  
25 doubt about privilege and you need time to consult with Mr.  
26 Miller, you'll just let me know?

27                   **MR. KEITH WILSON:** Yes, sir. I absolutely will.  
28 Thank you.



1                   **MR. JEFFREY LEON:** Now, you arrived in Ottawa  
2 then with the group on -- in the evening of February 2nd?

3                   **MR. KEITH WILSON:** That's correct.

4                   **MR. JEFFREY LEON:** And I understand you rented a  
5 car and went to the ARC Hotel?

6                   **MR. KEITH WILSON:** Yeah. There was -- I was in a  
7 taxi with Dwayne and I can't recall specifically who else was  
8 with me. And then the others rented a car, so there was -- we  
9 had two modes of getting there and the decision was to get me  
10 and Dwayne downtown as quick as possible because we had so  
11 little time to deal with whatever we anticipated coming.

12                   While we were on the plane, we received a  
13 briefing on and reviewed the emails from GoFundMe, which are in  
14 the record here, setting out all of their concerns, and then we  
15 drafted during that flight, a substantive -- I think my letter  
16 is four or five pages -- addressing each of the issues that  
17 GoFundMe had raised, so we were working on that flight. We  
18 wanted to get downtown to meet the clients, sign retainer  
19 agreements, and brief them and give them an opportunity to  
20 review that letter to GoFundMe, so to get it to GoFundMe as soon  
21 as possible.

22                   **MR. JEFFREY LEON:** Okay. And you went to the ARC  
23 Hotel; am I right?

24                   **MR. KEITH WILSON:** That's correct.

25                   **MR. JEFFREY LEON:** And that's downtown Ottawa,  
26 Slater and Metcalfe, I believe?

27                   **MR. KEITH WILSON:** Yeah. The vehicle we were in  
28 drove right up to the front door of the hotel just like it would

1 today.

2 **MR. JEFFREY LEON:** And when you got to the ARC  
3 Hotel, I understand you met with Tamara Lich, Chris Barber, and  
4 was there anybody else there?

5 **MR. KEITH WILSON:** Yeah, Miranda Gracer was  
6 there, Sean Tiessen was there, and I believe that's it. There  
7 might have been one or two other people in the room, but that's  
8 the best, to my recollection.

9 **MR. JEFFREY LEON:** And had you met any of these  
10 people before?

11 **MR. KEITH WILSON:** No, never.

12 **MR. JEFFREY LEON:** Had you at any time heard  
13 about Ms. Lich?

14 **MR. KEITH WILSON:** Yes, I heard about her, but  
15 only in the context of the Freedom Convoy. Anything else I  
16 learned about Ms. Lich, I'm pretty sure I Googled her as soon as  
17 I was starting to watch the convoy forum, so this would be in,  
18 you know, late January, to try to understand who she was, but I  
19 have had no prior dealings with her or awareness of who she was  
20 or what she was engaged in until I Googled her because of the  
21 convoy.

22 **MR. JEFFREY LEON:** And about what time did you  
23 arrive at the hotel?

24 **MR. KEITH WILSON:** My memory is it was about  
25 11:30 at night.

26 **MR. JEFFREY LEON:** Could you tell the  
27 Commissioner what happened at that point, in brief?

28 **MR. KEITH WILSON:** Sure. Well, I mean, first of

1 all we drove through the downtown so we could -- that was my  
2 first chance to see where all the trucks and the protest  
3 vehicles were, and all the signage and so on, and how you could  
4 still drive around. There was always one lane open. That's how  
5 we got right to the hotel.

6 When I walked into the lobby I could really feel  
7 the tension. There was truckers everywhere. There were  
8 supplies stacked and piled everywhere. And the tension was -- I  
9 could really feel the tension.

10 **MR. JEFFREY LEON:** So we come to the meeting that  
11 you had with your prospective -- at that time prospective  
12 clients. And you said you -- did you finalize your retainer at  
13 that point?

14 **MR. KEITH WILSON:** Yes. André Memauri had the  
15 paperwork and had them sign.

16 **MR. JEFFREY LEON:** And did the nature of your  
17 retainer differ from what you told us about what your  
18 understanding was about it?

19 **MR. KEITH WILSON:** Well, I should clarify one  
20 thing, that the way the Justice Centre operated at that time the  
21 retainer has their name on it, the Justice Centre ---

22 **MR. JEFFREY LEON:** Yes.

23 **MR. KEITH WILSON:** --- as the legal provider.  
24 Was the retainer different? No. The nature of my anticipated  
25 involvement remained constant.

26 **MR. JEFFREY LEON:** And I take it you then  
27 proceeded to get to know your clients?

28 **MR. KEITH WILSON:** Yeah.

1                   **MR. JEFFREY LEON:** How long did that evening  
2 meeting last? You got there at 11:30; when did it end?

3                   **MR. KEITH WILSON:** Not that long. Everybody was  
4 exhausted. We had just had, you know, landing and taking off  
5 several times in a small aircraft is a little bit hard on the  
6 body. And not to mention I'm sure all of the people on our team  
7 were the same. And this happened so fast we had very very  
8 little sleep.

9                   We could tell the fatigue and that was when I  
10 first was informed that Tamara was aware that some group was  
11 calling a press conference for the next day and they wanted her  
12 to speak. And I immediately started asking questions about --  
13 okay, who has called the press conference? What's its purpose?  
14 Who all is speaking? Was there a media advisory? She didn't  
15 know. You know, this is not her world. I've dealt with high  
16 profile cases and communication specialists extensively. So she  
17 didn't even know what a media advisory was.

18                   **MR. JEFFREY LEON:** And I understand that you  
19 wrote out her remarks for her?

20                   **MR. KEITH WILSON:** Well, what happened as I had  
21 no intention of being in the media. I was there to not be in  
22 the media but to provide guidance. And even in that first  
23 meeting I started hearing these different groups' names and I  
24 was -- okay, well, who is this group and why are they here? And  
25 what -- this other group -- it was -- the chess board was  
26 starting to -- the fog was starting to lift and I was sort of --  
27 oh boy. This is going to get complicated.

28                   The major concern I had was two things. Tamara

1 made it clear to me that she did not feel comfortable --  
2 appreciate, she was absolutely exhausted. They all were. I  
3 could see the fatigue. And she didn't feel comfortable being  
4 exposed to a long format press conference where every media  
5 person could come at her, basically. And so I was already  
6 giving some thought as to how we could possibly restructure the  
7 press conference to make it more orderly and make it more  
8 effective in conveying some information that I thought the  
9 public and the world wanted to hear.

10 **MR. JEFFREY LEON:** And did you prepare her  
11 remarks for her?

12 **MR. KEITH WILSON:** So the next morning my legal  
13 team was adamant that I should take a more active role in the  
14 press conference. I was initially reluctant.

15 When we got from our hotel which was out of the  
16 downtown to the ARC, and went into one of the logistics rooms on  
17 the main floor -- it's a big boardroom -- I got more information  
18 about the plan for the press conference and that was it was  
19 going to include a number of medical doctors.

20 **MR. JEFFREY LEON:** Sir, my question was just  
21 whether you prepared her remarks, Tamara Lich's remarks for her.

22 **MR. KEITH WILSON:** There was -- Take Back Our  
23 Freedoms had an external communications consulting firm that had  
24 prepared a speech for her. A number of us including Tamara Lich  
25 reviewed it, did not like the messaging, so Ms. Chipiuk and  
26 another individual, a medical doctor, rewrote it. It still  
27 wasn't in Ms. Lich's voice, so I assisted Ms. Lich in revising  
28 that statement and it was finalized in very short order because

1 we only had less than an hour. And then she proceeded to the  
2 press conference to deliver it.

3 **MR. JEFFREY LEON:** And Mr. Clerk, can I ask you  
4 to bring me up JCF00000155, the video. And I'd just like to  
5 play one minute from that.

6 **(VIDEO PLAYBACK)**

7 **MR. JEFFREY LEON:** Can I ask you to stop it  
8 there, please?

9 You say that Ms. Lich was the spark that lit this  
10 fire. Who told you that?

11 **MR. KEITH WILSON:** No one told me that.

12 **MR. JEFFREY LEON:** Where did it come from?

13 **MR. KEITH WILSON:** My brain.

14 **MR. JEFFREY LEON:** Okay. And how did your brain  
15 figure that out?

16 **MR. KEITH WILSON:** Well, I observed what was  
17 happening and I noticed that -- this is again prior to me being  
18 engaged -- that she seemed to be the organic leader. She was  
19 the one that was doing the Facebook lives and other videos. She  
20 was the one who was sending out the messages. And she seemed to  
21 have the personality of a natural leader that inspired others to  
22 get behind her.

23 **MR. JEFFREY LEON:** Thank you.

24 Now, can you bring up, Mr. Clerk HRF0000139? And  
25 this is a letter to GoFundMe that I think -- dated February 3<sup>rd</sup>.  
26 And that's the letter you told us was drafted on the plane,  
27 correct?

28 **MR. KEITH WILSON:** That's correct.

1                   **MR. JEFFREY LEON:** And just if you can scroll up,  
2 please, a little more.

3                   You note at the bottom there, you set out your  
4 understanding of the evolving goals of the committee's GoFundMe  
5 campaign?

6                   **MR. KEITH WILSON:** Yes.

7                   **MR. JEFFREY LEON:** And if you can just scroll up,  
8 I won't read them but those are -- that's what you understood to  
9 be the goals?

10                  **MR. KEITH WILSON:** Just one moment. Yes.

11                  **MR. JEFFREY LEON:** And if you can just scroll up  
12 a little more and stop there.

13                  The paragraph beginning, "Everyone has been  
14 surprised..." -- you say at the last sentence there:

15                                 "The truckers have been open with the  
16                                 media that they are not leaving until  
17                                 the government vaccine mandates are  
18                                 lifted."

19                  Who on the plane provided that information?

20                  **MR. KEITH WILSON:** I think it might have been  
21 either in some of the drafts that Mr. Eros had prepared, and  
22 understand that we did a draft on the plane, so that would have  
23 been the -- is that the Wednesday night? Anyway, the February  
24 2<sup>nd</sup>. Then we had the letter reviewed by the clients, and then  
25 the letter the next morning was reviewed by the Finance  
26 Committee back in Alberta, and a number of people requested, as  
27 normally occurs if you circulate a draft, that words and  
28 sentences be added. So I don't know exactly ---

1                   **MR. JEFFREY LEON:** Okay.

2                   **MR. KEITH WILSON:** --- whether that arose on the  
3 very first draft, or whether that was something that some of the  
4 leaders in Ottawa had added, or whether that was something that  
5 the Finance Committee wanted added.

6                   **MR. JEFFREY LEON:** And can you just scroll up a  
7 little more, please? You note in the second bolded paragraphs  
8 that,

9                                   "[The] intention is not to reimburse  
10                                   those [for -- those] committing  
11                                   unlawful acts or criminal acts."

12                   And you say,

13                                   "The [...] Convoy has [...] been clear  
14                                   [...] it only supports peaceful  
15                                   assembly."

16                   At this point in time, I take it you were aware  
17 that there were some officials that are -- were suggesting that  
18 some of the conduct going on was unlawful?

19                   **MR. KEITH WILSON:** Yeah, and I've heard that a  
20 lot. And what I've always struggled with is at what point in  
21 time did those officials believe it became an unlawful assembly  
22 and on what basis, because it just seemed to be a terminology  
23 that started to morph and become adopted with no particular  
24 triggering event or explanation as to what that individual or  
25 official thought constituted an unlawful assembly.

26                   **MR. JEFFREY LEON:** And later that day, you  
27 attended a phone meeting with GoFundMe?

28                   **MR. KEITH WILSON:** That's correct.



1                   **MR. JEFFREY LEON:** And among other people ---

2                   **MR. KEITH WILSON:** That would have been on the --  
3 sorry, that would have been on a Thursday afternoon.

4                   **MR. JEFFREY LEON:** Yeah. And among other people,  
5 Mr. Eros was on that call?

6                   **MR. KEITH WILSON:** Yeah, all of the lawyers that  
7 were with me and a number of the Board members from Freedom  
8 Corp. were there as well as Ms. Lich.

9                   **MR. JEFFREY LEON:** And -- or, Mr. Clerk, can you  
10 bring up WTS00000032 and go to page 8? This is a witness  
11 statement provided by Chad Eros, and he made certain statements  
12 in there and I want to give you an opportunity to respond.

13                   **MR. KEITH WILSON:** Sure.

14                   **MR. JEFFREY LEON:** On page 8, he says that the --  
15 if you can scroll up? A little more, please. And I'm not  
16 seeing it right now, but he does say that he -- the JCCF lawyers  
17 and specifically you were trying to take over the meeting and  
18 assert themselves as the spokespeople on the financial side of  
19 the convoy; do you remember reading that?

20                   **MR. KEITH WILSON:** I don't remember reading that.

21                   **MR. JEFFREY LEON:** Right there in where it says  
22 Mr. Wilson trying to take over the meeting? All I want to know  
23 is whether you want to respond to that.

24                   **MR. KEITH WILSON:** Well, I mean, what does that  
25 mean? When I -- I led the meeting. Someone needs to lead a  
26 meeting from -- when you have two parties. Mr. Eros spoke,  
27 other lawyers spoke. Mr. Eros spoke extensively in explaining  
28 to the GoFundMe executives and their legal team, because there

1 was -- I would estimate by memory, there was 10 to 12 people  
2 from GoFundMe on the other side of the conference call. This  
3 was a call, not a Zoom.

4 **MR. JEFFREY LEON:** Yeah.

5 **MR. KEITH WILSON:** And ---

6 **MR. JEFFREY LEON:** And you mentioned -- sorry.

7 **MR. KEITH WILSON:** --- and we relied heavily, at  
8 least our side, on Mr. Eros explaining the financial controls  
9 and who he was and his background in banking and as a CPA and in  
10 his role as treasurer, but, yes, I did lead the discussion.  
11 That is true.

12 **MR. JEFFREY LEON:** And I understand as well that  
13 you had some discussions with Mr. Eros about the organization  
14 Take Back our Freedoms?

15 **MR. KEITH WILSON:** Yes.

16 **MR. JEFFREY LEON:** And did Ms. Lich have some  
17 concerns about that organization?

18 **MR. KEITH WILSON:** Yes.

19 **MR. JEFFREY LEON:** And what were those concerns?

20 **MR. KEITH WILSON:** My memory is, as I indicated  
21 in my witness statement, and it wasn't just Take Back our  
22 Freedoms, this was happening extensively and it happened  
23 immediate -- or I observed it immediately after the first day  
24 when I actually started to, you know, appreciate I'm coming in  
25 at night and go through the lobby and up to a hotel room and  
26 then back out. The next day, I'm now starting to interact more,  
27 and I'm now in a big boardroom and there's these different  
28 people coming and going, and I'm trying to figure out who's who.

1 You know, there was no organization chart or introduction  
2 session. It's not even like a meeting where you go around the  
3 table and introduce one another. That didn't happen. It was  
4 constant chaos.

5 So I learned that there was a group and then I  
6 learned there was this TBOF. I didn't even know what TBOF meant  
7 initially. And then I'd heard about this Canada Unity, and then  
8 there was Mr. Bourgault's group, something for Freedom, and  
9 there was Veterans for Freedom. I could go on. There was so  
10 many different groups I was starting to learn of. And what I  
11 observed was that the different groups were trying to take  
12 certain -- trying to take control. And what I observed and  
13 believed to be true is that some were trying to take control  
14 because they saw the organic flat hierarchy largely of the  
15 convoy and wanted to make it more successful and felt they had  
16 the organizational capability to do that.

17 Other groups seemed to want to reshape the  
18 Freedom Convoy into their own event, branded theirs, and I got  
19 the distinct impression from some other that they were trying to  
20 get their hands on what, at that point, was \$10 million in  
21 donations. And my impression and my recollection from the  
22 discussions that I would have with Ms. Lich as various people  
23 would demand private meetings, or, you know, play games and say  
24 we weren't allowed to use the boardroom because it was their  
25 boardroom, those sorts of things, that she was under pressure  
26 from a lot of these different groups for the reasons I've given.

27 **MR. JEFFREY LEON:** Okay. And coming back to --  
28 kind of Take Back our Freedoms, and am I correct that Mr.

1 Peckford was the chairman of that organization?

2 **MR. KEITH WILSON:** Yeah, and it's interesting  
3 because he's more of a symbolic chairman. In all of my  
4 discussions with the Honourable Brian Peckford, I would speak  
5 with him, not every evening, but, you know, maybe every second  
6 or third evening. My telephone logs confirm that, that I've  
7 tendered in evidence. And I was looking for guidance from him.  
8 He was -- you know, he's an elder statesman. He's been through  
9 a lot. He's one of the founding fathers of our *Charter of*  
10 *Rights and Freedoms*, very seasoned politician. And so at no  
11 time did we ever have any discussion around Take Back our  
12 Freedoms was -- did I feel he was speaking on their behalf. Him  
13 and I had become somewhat close through my work on his Federal  
14 Travel Mandate *Charter* challenge in Federal Court, and I was  
15 using him as a resource and someone to run ideas past and get  
16 guidance from.

17 **MR. JEFFREY LEON:** And am I correct that you were  
18 aware that at least Mr. Eros had some concern that if there were  
19 concerns about Take Back our Freedoms, and you were acting on  
20 behalf of Mr. Peckford in that other litigation that you were in  
21 a conflict of interest position?

22 **MR. KEITH WILSON:** That was never raised at any  
23 time. I don't feel I was in a conflict because at no time did  
24 Mr. Peckford ever ask of anything of me. I was the only one who  
25 asked of things from him. And the concerns that you're  
26 referring to are concerns that were never aired at any time  
27 during Ottawa by Mr. Eros, and only some months later after the  
28 Ottawa protest had concluded.

1           **MR. JEFFREY LEON:** Okay. Thank you.

2           And then just to shift a little bit here, am I --  
3 you went -- you were staying at the ARC Hotel, is that right?

4           **MR. KEITH WILSON:** No.

5           **MR. JEFFREY LEON:** Where were you staying?

6           **MR. KEITH WILSON:** At a Best Western, I believe  
7 it was in -- it was about a 20-minute drive towards the East.

8           **MR. JEFFREY LEON:** So you arrived there, excuse  
9 me, on February ---

10          **MR. KEITH WILSON:** So that's, what, 20-minute  
11 drive from downtown.

12          **MR. JEFFREY LEON:** Right.

13          **MR. KEITH WILSON:** So each day it took us 20  
14 minutes to get into the downtown core.

15          **MR. JEFFREY LEON:** And so you arrived there on --  
16 did you stay there the night of February 2<sup>nd</sup>?

17          **MR. KEITH WILSON:** That's correct.

18          **MR. JEFFREY LEON:** And when did you leave?

19          **MR. KEITH WILSON:** Our stay there ended -- it  
20 would have been approximately around the Sunday of -- just  
21 trying to visualize a calendar here -- the second Sunday would  
22 have been -- anyway, it was -- I think we stayed there for about  
23 10 days.

24          **MR. JEFFREY LEON:** And then where did you go?

25          **MR. KEITH WILSON:** Then we went to the Swiss  
26 Hotel.

27          **MR. JEFFREY LEON:** And how long did you stay  
28 there?

1                   **MR. KEITH WILSON:** We stayed there until the  
2 Wednesday, which would have been the 16<sup>th</sup>. It was on the  
3 Wednesday that it was apparent -- this was when we -- I had had  
4 the phone call from Steve K., City Manager, advising me that the  
5 third attempt to move trucks was going to be unsuccessful, and  
6 he was very disappointed, as he himself testified here.

7                   **MR. JEFFREY LEON:** Okay.

8                   **MR. KEITH WILSON:** And ---

9                   **MR. JEFFREY LEON:** I was just asking you the  
10 date, sir, and ---

11                   **MR. KEITH WILSON:** Yeah, I'm -- sorry; I'm trying  
12 to contextualize things, and I have to remember things by events  
13 because I wasn't calendar focused.

14                   And so it was that day that it became apparent  
15 that something dramatic was about to happen by the government  
16 and the police, and as a result Ms. Lich instructed Ms. Chipiuk  
17 and I -- because we were the only two lawyers left on the ground  
18 at that point -- to relocate to a new hotel.

19                   **MR. JEFFREY LEON:** And where was that?

20                   **MR. KEITH WILSON:** Le Germain.

21                   **MR. JEFFREY LEON:** And how long did you stay  
22 there?

23                   **MR. KEITH WILSON:** I stayed there until the  
24 Sunday, which would be the 20<sup>th</sup> or the 21<sup>st</sup>, I believe.

25                   **MR. JEFFREY LEON:** And then did you go back to  
26 Edmonton?

27                   **MR. KEITH WILSON:** I went home, yes.

28                   **MR. JEFFREY LEON:** Okay. Now, did you have

1 interaction, during the period you were there, with James  
2 Bauder?

3 **MR. KEITH WILSON:** No. And if I did it might  
4 have been where I was in a room or in a hallway or on a sidewalk  
5 and he shook my hand, but I met so many people ---

6 **MR. JEFFREY LEON:** Okay.

7 **MR. KEITH WILSON:** --- the interaction would have  
8 been unremarkable.

9 **MR. JEFFREY LEON:** And you became aware of his --  
10 or Canada Unity's Memorandum of Understanding?

11 **MR. KEITH WILSON:** Yeah, very early on I was  
12 approached by many people, both within the client group and  
13 others asking me about it.

14 **MR. JEFFREY LEON:** And I believe -- is it fair to  
15 say it was, in your -- from your perception, getting a lot of  
16 attention and you talked to a lot of people about it?

17 **MR. KEITH WILSON:** Yeah, they would ask me. I  
18 didn't make it a topic that I felt I needed to discuss with  
19 others, but I did get asked it a lot.

20 **MR. JEFFREY LEON:** Okay.

21 **MR. KEITH WILSON:** And what I -- you know the  
22 first thing that's obvious about it is a Memorandum of  
23 Understanding, in its simplest legal concept, requires all  
24 parties to it to sign. And it was evident that the signature  
25 lines on the last page were not going to be signed by the  
26 Governor General, nor someone from the Senate; and in any event  
27 I would explain -- when I was asked by the Board, to brief them  
28 on it, I explained that -- and I apologize for my voice, I'm

1 suffering from a cold.

2 **MR. JEFFREY LEON:** There's a water there for you.

3 **MR. KEITH WILSON:** Yeah, thank you. That I  
4 explained that there's only two ways that governments change  
5 under our Parliamentary system. The first is when the Prime  
6 Minister contacts the government, the Governor General, and  
7 dissolves Parliament and asks that the writ be dropped. The  
8 second, through Parliamentary tradition, is where a bill is  
9 identified as a confidence vote and Parliament votes to defeat  
10 the bill. In that second instance, the Prime Minister would  
11 similarly contact the Governor General.

12 This idea that a certain number of people could  
13 sign a document, and that would somehow compel, or incentivize,  
14 and lead to a changing government, I explained, consistently and  
15 repeatedly, is legal nonsense.

16 **MR. JEFFREY LEON:** And you knew that -- did you  
17 know at the time that almost somewhere around 300,000 people had  
18 signed on to a petition regarding that?

19 **MR. KEITH WILSON:** I didn't know the number; I  
20 knew that it pre-existed the convoy. I knew that Canada Unity  
21 pre-existed the convoy as a group by at least a year or two;  
22 that it was not a creation of the convoy. It was one of these  
23 hanger-ons.

24 **MR. JEFFREY LEON:** So I take it you were  
25 surprised that so many people were taking it seriously; is that  
26 fair to say?

27 **MR. KEITH WILSON:** I am very surprised at -- this  
28 is not the first time I've run into this; I've had to litigate



1 opposite the Sovereign Citizen folks, and quoting Admiralty law  
2 and think that if they present a flag in a certain way in a  
3 court, the Judge loses jurisdiction. I've had to encounter this  
4 many, many times in my career, so I was just like, here's  
5 another one.

6 **MR. JEFFREY LEON:** Okay. Now, on February 4<sup>th</sup>, I  
7 understand you were served with a Statement of Claim and an  
8 injunction motion by Mr. Champ?

9 **MR. KEITH WILSON:** That's correct.

10 **MR. JEFFREY LEON:** And you represented the convoy  
11 leaders in that matter?

12 **MR. KEITH WILSON:** Yeah. Not everyone who was  
13 named at that time, is my memory. That pleading has been  
14 amended a number of times and is a evolving document, is to be  
15 expected in a litigation of that nature.

16 **MR. JEFFREY LEON:** And did you oppose the  
17 injunction?

18 **MR. KEITH WILSON:** What we did was, we received  
19 it at approximately 4 o'clock. That was at the same time that  
20 we also received notification publicly that GoFundMe had  
21 determined that the fundraiser violated the terms of service and  
22 they were stopping it, and either going to send the money to  
23 some other group or refund it.

24 We had a lot going on. We were served with a  
25 motion record, emergency motion returnable the Saturday  
26 afternoon at 1 o'clock. So my legal team and I prepared through  
27 the night. Through the night Mr. Champ continued to provide  
28 supplemental materials in the magnitude of hundreds of pages.

1 We had everything ready to go by noonish the next day but not  
2 even enough time for me to read the *factum*. So I took ---

3 **MR. JEFFREY LEON:** Did you oppose the motion?

4 **MR. KEITH WILSON:** I'm answering your question,  
5 sir.

6 We took the position that it was just improper  
7 for the Court to hear it on the Saturday. We agreed to come  
8 back on the Monday. I had informed my clients that there is no  
9 way the Court was not going to grant the injunction, and that  
10 the best we could do was to ensure that the terms of the  
11 injunction order were not excessive, were not prone to abuse and  
12 arbitrariness, and had an acknowledgement of their right to  
13 protest.

14 So we -- the real argument before the Court was,  
15 what is the terms of the order going to be and get -- overcoming  
16 the challenge of *in rem* versus *in personam* orders.

17 **MR. JEFFREY LEON:** Thank you.

18 Now, around that same time, I understand from  
19 your witness statement that you had some discussions with Mr.  
20 Marazzo about his concerns that there had seemed to be a change  
21 in tone in the response of the Ontario Police Service to the  
22 protestors.

23 **MR. KEITH WILSON:** Yeah, the Ottawa Police  
24 Service, that's correct.

25 **MR. JEFFREY LEON:** And that change in tone was  
26 related to what Mr. Marazzo saw as a shift from a negotiation  
27 type response to a surge and contain enforcement type response.  
28 Is that right?

1                   **MR. KEITH WILSON:** Precise.

2                   **MR. JEFFREY LEON:** And was that consistent with  
3 your view?

4                   **MR. KEITH WILSON:** Yeah. And we had -- to the  
5 extent we had the opportunity because, as you can appreciate, it  
6 was a very, very, fast-moving, chaotic environment with so many  
7 either interpersonal issues arising between the players or  
8 logistical issues or whatever. But we did have occasion when we  
9 were -- Ms. Chipiuk and I were leaving our hotel, we worked --  
10 it must have been -- it must have been the Monday when we were  
11 in Court because we ran those from our hotel outside of  
12 downtown.

13                   And we heard Ms. Deans in an interview on CBC's  
14 "As It Happens", and her language was deeply troubling and that,  
15 combined with Mr. Marazzo expressing concerns about the change  
16 in tone from Chief Sloly, it heightened the urgency of trying to  
17 find a way to open up dialogue.

18                   And I had -- if you look at my phone records,  
19 you'll see that my first attempt to bring in Mr. French  
20 occurred, actually, that weekend.

21                   **MR. JEFFREY LEON:** Okay. And what was your  
22 strategy as a result of this?

23                   **MR. KEITH WILSON:** Well, in my past I've been  
24 involved in two international scope crises. The first was the  
25 2003 mad cow disease outbreak in Alberta where I was  
26 representing a government agency, and the second was in 2009,  
27 H1N1, where I represented the people who were patient zero for  
28 the Zootonic (sic) transmutation.

1                   And so I've been in Emergency Operations Centres  
2 of government on two major incidents and I've seen the chaos  
3 that occurs in there and, you know, I know the importance of  
4 dialogue and communication and I can sense the danger of the  
5 parties not talking even if it's back channel.

6                   So I had a strong desire to open up back channel  
7 communications so we could bring the temperature down and start  
8 to see if there's ways to resolve this, to deescalate this, wind  
9 this thing down, so that was a heavy focus of mine at all times.

10                   **MR. JEFFREY LEON:** Okay. And I take it that you  
11 contacted Mr. Peckford and asked him if he had any contacts that  
12 might help?

13                   **MR. KEITH WILSON:** Yes.

14                   **MR. JEFFREY LEON:** And then you received a call  
15 from Dean French.

16                   **MR. KEITH WILSON:** That's correct.

17                   **MR. JEFFREY LEON:** And in your statement, you  
18 indicate that Mr. French suggested that it would -- what was  
19 needed was to move trucks out of the residential areas. Is that  
20 correct?

21                   **MR. KEITH WILSON:** Yeah, he laid down some ground  
22 rules, sort of base conditions for his willingness to get  
23 involved and try and be an intermediary. And so we had -- I  
24 still remember, and Eva Chipiuk reminded me of it, that we had a  
25 very, very intense phone call where he was testing me and I was  
26 testing him. But what he made absolutely clear was that the  
27 truckers had to be willing to move out of the residential areas  
28 and I had to be honest with him about whether I thought that was

1 achievable. And once he learned to trust me and I learned to  
2 trust him, we both thought it was achievable, so then he  
3 proceeded to go to work.

4 **MR. JEFFREY LEON:** To which?

5 **MR. KEITH WILSON:** To go to work on it, go behind  
6 the scenes.

7 And I wasn't asking for the details. That's not  
8 it works if you've ever done this before. You just let them go  
9 do their thing behind the scenes and they will come back to you  
10 at the appropriate time.

11 **MR. JEFFREY LEON:** And on February 8, I  
12 understand that Mr. Marazzo asked if you and Ms. Chipiuk would  
13 come to a meeting at City Hall.

14 **MR. KEITH WILSON:** Yeah, what had happened was I  
15 first met Mr. Marazzo on the Thursday that we had the press  
16 conference. It was later in the day that I was introduced to  
17 him. It's the first time I had met him.

18 I immediately was impressed with his calmness and  
19 his levelheadedness. He didn't -- there was a lot of emotion up  
20 and down with various individuals in these rooms, but Tom was  
21 always just completely calm.

22 And he had been observing for longer than us, and  
23 he had been working with the police liaisons and felt that he  
24 was in a circle where nothing material was arising. And he  
25 advised in the meeting room -- I remember he came in, he left a  
26 meeting with the PLTs and had told them that he didn't want to  
27 speak with them any more and he needed somebody that was more of  
28 an Inspector level, somebody who had some actual decision-making

1 capability and greater authority.

2 Things went quiet. The next morning, this would  
3 be now the Tuesday ---

4 **MR. JEFFREY LEON:** February 8?

5 **MR. KEITH WILSON:** Correct.

6 Tom told Ms. Chipiuk and I that he wanted us to  
7 come to a meeting at City Hall at noon, and I said, "Okay.  
8 What's this all about and does the City know we're coming?"  
9 because one thing that is a certainty a lawyer will -- of any  
10 experience will share with you is that it's always a bad idea  
11 for your client to unexpectedly bring lawyers to meetings. It  
12 never goes well.

13 So I've never before consented to that in my 27  
14 years, but this being such an unusual circumstance, I agreed  
15 that we would go. And we arrived at City Hall and had quite an  
16 interesting interaction in order to get upstairs to meet with  
17 Steve K.

18 **MR. JEFFREY LEON:** Okay. And I take it that you  
19 met with the PLT officers and they weren't very happy about your  
20 being there. Is that right?

21 **MR. KEITH WILSON:** Animatedly angry, yeah.

22 **MR. JEFFREY LEON:** And so as you indicate in your  
23 statement, you told them that -- to try and cool things down  
24 that you would seek instructions not to impose the continuation  
25 of the injunction which was coming up in Court.

26 **MR. KEITH WILSON:** That's correct. We -- the  
27 only thing -- you know, you kind of -- you go through your  
28 pockets and see what do I have, and I had nothing. And Ms.

1 Chipiuk is astute, and she has pointed out that there was one  
2 thing that we did control, and that was what recommendation we  
3 could make to the Board about what position they would take on  
4 the continuation of the injunction because Justice MacLean had  
5 issued it for a set number of days. I can't remember the number  
6 of days, but it was only set and we had a returnable date that  
7 was coming up in the following -- either the -- later that week,  
8 I believe. You can figure it out from the pleadings.

9                   So we said that we would seek instructions from  
10 our client not to oppose it becoming a long-term injunction, so  
11 the quiet that had resulted from the injunction would remain,  
12 and that was what we offered.

13                   **MR. JEFFREY LEON:** Had it been your instructions  
14 to oppose the continuation of that injunction?

15                   **MR. KEITH WILSON:** I had not yet received  
16 instructions at that point.

17                   **MR. JEFFREY LEON:** And I take it that you  
18 ultimately had the meeting with Mr. Kanellakos?

19                   **MR. KEITH WILSON:** Yes.

20                   **MR. JEFFREY LEON:** And were you here for his  
21 testimony?

22                   **MR. KEITH WILSON:** Yes.

23                   **MR. JEFFREY LEON:** And is there anything about  
24 what he testified to regarding the meeting that you disagree  
25 with?

26                   **MR. KEITH WILSON:** There was a couple of sort of  
27 nuanced details, but -- that I think he might have just been  
28 misremembering, at least, or, alternatively, I am, but nothing

1 of substance.

2 **MR. JEFFREY LEON:** Okay. And subsequent to that  
3 meeting -- or sorry. Let me take a step back.

4 **MR. KEITH WILSON:** Sure.

5 **MR. JEFFREY LEON:** I understand that he had two  
6 concerns. One was to keep the meeting secret because he didn't  
7 want it to get out if there wasn't a successful negotiation, and  
8 he wanted to move trucks from the residential area and the  
9 Rideau-Sussex intersection.

10 **MR. KEITH WILSON:** Yeah, he'd given us a list of  
11 three -- so I led by saying once Eva and I went into the room --  
12 and I know there was some conflicting testimony. There was  
13 three PLTs in that room. There was seven people in that room.

14 I know someone testified. I think it was one of  
15 the -- it might have been Drummond -- that there was no police  
16 in the room. That is absolutely false. And he likely just  
17 wasn't accurately briefed, I suspect.

18 And I led by saying, "Okay, give us your top  
19 three. If we can get movement at three locations in the  
20 downtown -- if we can move trucks and protesters, where can we  
21 provide the most immediate and effective relief?"

22 And they gave us the three locations and one of  
23 them was Kent and I can't recall the other two. But what I also  
24 picked up on, as did Tom Marazzo and Eva Chipiuk, is that they  
25 spent almost the entirety of their time talking about Rideau and  
26 Sussex. And so even though we had this list it was clear to me  
27 and to us as a team that Rideau and Sussex was in a category by  
28 itself.



1                   So we promised them at the end of the meeting  
2 that we would keep the meeting secret. And the reason that that  
3 was important is in these situations it's always about building  
4 trust and it's the littlest things you can control that build  
5 the trust. And so we agreed to keep the meeting secret. And in  
6 fact no word got out about the meeting.

7                   And I said -- and I'm not from Ottawa so, you  
8 know, I was stuck in buildings and then when I was on the move  
9 it was often at night so I was very spatially disoriented all  
10 the time. And so I said to Eva Chipiuk who had done her -- I  
11 don't think it was her Master of Laws; I think it was her  
12 undergrad or her LLB here in Ottawa so she was very familiar  
13 with the area, and om obviously was.

14                   So I said, "Can you please take me to Rideau and  
15 Sussex?"

16                   **MR. JEFFREY LEON:** So I take it that after the  
17 meeting the three of you went to the intersection?

18                   **MR. KEITH WILSON:** That's correct.

19                   **MR. JEFFREY LEON:** And Mr. Clerk, could you bring  
20 up HRF00001550?

21                   I take it this is a picture that you took of the  
22 intersection at that time?

23                   **MR. KEITH WILSON:** Yeah, I took several pictures  
24 including a picture with Mr. Marazzo and Ms. Chipiuk in it. I  
25 started doing that just to help keep track of things, you know.  
26 You get metadata on your phone so it shows exactly what time and  
27 place so I started taking these pictures.

28                   **MR. JEFFREY LEON:** And you indicate in your

1 statement that at some point you left the intersection and Ms.  
2 Chipiuk and Mr. Marazzo remained to talk to the protesters?

3 **MR. KEITH WILSON:** Yeah. We decided -- and this  
4 is the way things worked, particularly with the people that were  
5 there involved in the protest, is if something needed to be done  
6 you did it right there and then. You never waited.

7 So the decision -- we had a discussion and it was  
8 Eva and Tom were like, well, why don't we try and move this  
9 intersection right now?

10 So I said, "All right. I'll go back to the  
11 Sheridan." And the reason that we agreed that I would go is  
12 because we had so little to negotiate with in terms of tools and  
13 tactics with the protesters. Because I had been on the stage at  
14 the press conference the week previous, I was recognized as the  
15 truckers' convoy lawyer. So the idea was that if they made  
16 significant progress but needed just something more to get the  
17 truckers to agree to clear this intersection that I would --  
18 that they would say, "Well, we're going to have to have Keith  
19 come." And then I would come and try and use whatever influence  
20 I may have.

21 So that was the plan. And to be clear -- because  
22 there's been conflicting evidence about this -- our focus at  
23 this intersection was to clear it, which is very different from  
24 the dal with the mayor what the objective was.

25 **MR. JEFFREY LEON:** Yes.

26 **MR. KEITH WILSON:** This was to clear this  
27 intersection and as soon as we got there we could see why it was  
28 such a concern. I think there are six streets that come

1 together. There's the very high end condo tower. There's the  
2 U.S. embassy down the road. The Senate. And on and on. And we  
3 were like, "Okay, we understand why they want this cleared."

4 So our goal was at least to clear up the west  
5 bound lanes.

6 **MR. JEFFREY LEON:** And if we can bring up -- back  
7 up your witness summary, WTS00000058 at page 7? And can you  
8 scroll up a bit?

9 You set out there -- and in the interest of time  
10 I'm not going to take you through it all -- of what happened at  
11 Rideau and Sussex that led up to your finding out that there was  
12 a willing -- or at least Ms. Chipiuk and Mr. Marazzo at the  
13 bottom paragraph -- finding out that the truckers had agreed to  
14 move their vehicles to Wellington but there was a problem in  
15 removing the jersey barriers and that fell through.

16 **MR. KEITH WILSON:** Correct. It was not -- what  
17 had happened was my briefing is that we had an advantage because  
18 the first three big trucks that would have to move were the ones  
19 that had the Polish immigrants. And Ms. Chipiuk is Polish  
20 background and can speak Polish fluently. And she very quickly  
21 developed a rapport with these truckers.

22 And we knew if we could get the first three to go  
23 it would incentivize the other ones to join in. There was a  
24 sense of each of these areas that people didn't want to be left  
25 alone, that there was a real group think going, we picked up.  
26 So but this was an intense group. There's no doubt about it. I  
27 mean, you've heard about that. There was this -- the first time  
28 I heard it was in this Inquiry so it was never on our radar.

1                   But so Mr. Marazzo gathered about 80 of them  
2 together and in the middle of the intersection surrounded by  
3 their vehicles, and got them to pick amongst themselves two  
4 representatives. And he moved forward in effectively a parlay  
5 in a military sense with the police to the west up closer to  
6 Wellington. And then the particular police liaison, Sgt. Fung  
7 Li, had a little bit of an aggressive personality. He could  
8 really turn aggressive very quickly. And Mr. Marazzo was  
9 concerned about him interacting directly with the trucker  
10 leaders from the intersection. So Tom went up and spoke to Fung  
11 and said, "Okay, bring in the equipment. We're ready to move at  
12 least half the intersection, the westbound, up into that space  
13 on Wellington."

14                   Fung Li's phone rang. He stepped back. And then  
15 turned around and said to Tom, "The deal's off. They're not  
16 going to move the barricades."

17                   And we now know from the record and the testimony  
18 of others that others higher up the command vetoed that  
19 movement. So Tom ---

20                   **MR. JEFFREY LEON:** Okay.

21                   **MR. KEITH WILSON:** But this is important. Tom  
22 did not go back and disclose what actually happened. He said,  
23 "They just can't get the barriers moved," because he didn't ant  
24 to destroy what little progress we had made.

25                   We agreed to have a cooling off because a lot of  
26 the truckers were upset. They had had arrangements to make the  
27 kinds of moves before our involvement and they felt that the  
28 police had double-crossed them. And so we decided to give

1 everything a colling off and to try again on the Thursday.

2 **MR. JEFFREY LEON:** And so that was on February  
3 8<sup>th</sup>. And I take it that February 9<sup>th</sup> there were some discussions  
4 with the OPS PLT officers and that led to February 10<sup>th</sup> where you  
5 returned to Rideau and Sussex to try again. Is that correct?

6 **MR. KEITH WILSON:** On the 9<sup>th</sup>, the PLTs about  
7 4:45, 4:40 p.m. contacted me through Eva Chipiuk. That was --  
8 the protocol we had is that if they needed to get me urgently  
9 they would call her because she was always at my side. And they  
10 came over to a meeting in the main floor of the Sheridan. It  
11 was an intense meeting.

12 But we briefed the Board that evening and Tamara  
13 Lich requested that all of the road captains, all legal, the  
14 board members all assemble at Sussex -- or Rideau and Sussex the  
15 next morning prior to 10:00 a.m. in an effort -- an all-out  
16 effort to use their persuasive skills.

17 We had an initial success where there was a  
18 LoadSafe truck that you'll see lots of picture -- LoadSafe is  
19 what was on the logo on the side of the cargo trailer of the  
20 semitruck and it was parked by the valet area of the Chateau  
21 Laurier and it was pulled up on angle almost jackknife blocking  
22 almost four lanes and the police did not like it all. They had  
23 been trying to move it and I was standing with a large group of  
24 PLTs, Ms. Lich, and others. Mr. Barber came up. We said,  
25 "Hey." I said, "Chris" -- or one of us said to Chris, "Is there  
26 any way you could go talk to that guy?" And as you heard, we  
27 all watched in amazement; Chris jumped up on the step and was  
28 hanging onto the mirror, the window came down, he started

1 visiting with a few minutes and all of the sudden, Chris  
2 hollered out for truckers to come and set up a perimeter to  
3 safely back him up and the backup alarm went on and they  
4 repositioned him so he was right up against the curb. And I  
5 remember, we all thought, "Okay, this is a good sign. Maybe  
6 we're going to do this."

7 **MR. JEFFREY LEON:** And then, as you say in your  
8 statement, the -- there was a crowd that suddenly appeared who  
9 didn't understand what was going on and they, in effect,  
10 surrounded the area.

11 **MR. KEITH WILSON:** Would -- just a little bit  
12 more detail because I think it's important for context.

13 **MR. JEFFREY LEON:** If I can just stop you for one  
14 second. I do have a video. Would that help?

15 **MR. KEITH WILSON:** I'd like to contextualize it  
16 first if I could?

17 **MR. JEFFREY LEON:** Sure.

18 **MR. KEITH WILSON:** So what happened was we had a  
19 bunch of failed attempts to get the -- enough truckers to agree.  
20 We always had the Polish guys at the front that were ready to  
21 go. So a lot of the team -- or those of that were there to try  
22 and clear that intersection were done. It was a very, very cold  
23 day. I was back and forth trying to keep warm in the lobby of  
24 the Chateau Laurier. That's when I got served with one of the  
25 seizure orders and was dealing with the TD Bank on interpleader.  
26 There was so many things going on all the time.

27 In any event, we had largely given up. It was  
28 just about to get dark and then one of the PLTs came out of the

1 area. And he came up -- and Tamara was with me and a couple of  
2 others -- and said, "They're ready to go." And Tamara's like,  
3 "Well, then let's do it." So they called in the big heavy-lift  
4 equipment to lift the barricade and they ended up bringing a tow  
5 truck as well a flatbed tow truck because, as you may have saw  
6 in one of those pictures, they have these orange mechanical  
7 devices that are actually bolted to the ground and when the  
8 vehicle drives over it, it comes up behind it.

9                   So we were waiting. It was now getting dark and,  
10 as was typical, is you get into four or five o'clock, six  
11 o'clock, the number of Ottawa residents and others that would  
12 start to converge in the downtown would significantly increase  
13 each night. This was typical of that. Well, when the trucks  
14 and the heavy equipment arrived, they've got yellow flashing  
15 lights; they have backup alarms. That caused even more people  
16 to come. Because we were anticipating moving the trucks up past  
17 the War Memorial to Wellington, we needed -- the police were  
18 obviously handling this part of it -- more police to create a  
19 safety corridor so that no one got run over. And as the one  
20 vehicle backed up, and its alarm was very loud, people started  
21 to rush in.

22                   Tamara had been removing from the barricades the  
23 signs. No one else -- the police were smart not to go and  
24 taking signs down. It was Tamara. And she was recognized so  
25 she would place the signs over on another railing by the Senate  
26 to get the barricades ready to be removed safely without  
27 controversy, hopefully. Just as the equipment was going, people  
28 rushed behind the tow truck because they seemed to think that

1 the police were about to do something bad to the truckers. I  
2 was talking to them. Tamara was individually talking to groups  
3 of people, "It's okay. This is a cooperative move. We're  
4 trying to clear this intersection. The truckers want to move up  
5 to Wellington."

6 And then people would sit on a barricade. Tamara  
7 would go talk to them. They'd apologize, get off the barricade.  
8 She'd turn around and they were on another -- different people  
9 were on another barricade. And then the police were further in.  
10 Tamara and I were trying to talk to as many people as we could  
11 to explain that it was okay, "This is a cooperative move. We're  
12 just trying to clear an intersection." And then the people just  
13 swarmed in, and that's where the video plays.

14 **MR. JEFFREY LEON:** Okay. Can you pull up,  
15 please, HRF00001587?

16 **MR. KEITH WILSON:** And I'm in the orange, high-  
17 visibility coat ---

18 **MR. JEFFREY LEON:** Yes.

19 **MR. KEITH WILSON:** --- which they jokingly called  
20 my "trucker camo".

21 (VIDEO PLAYBACK)

22 **MR. JEFFREY LEON:** Okay, thank you. Now, I'd  
23 like to move back to your statement, please. That's  
24 WTS00000058. And we only have about 15 minutes so ---

25 **MR. KEITH WILSON:** Thank you.

26 **MR. JEFFREY LEON:** --- I think we're going to try  
27 and speed it up a bit. The ---

28 **COMMISSIONER ROULEAU:** Excuse me. That video was



1 what date? That's ---

2 **MR. KEITH WILSON:** That would have been on the  
3 Thursday, sir. That would have been February 10<sup>th</sup>, the evening.  
4 That would have been about five o'clock.

5 **COMMISSIONER ROULEAU:** Sorry, go ahead.

6 **MR. JEFFREY LEON:** Now, you set out, starting at  
7 page 9 of your statement, the -- your dealings with Mr. French  
8 and leading up to a meeting with him on February 11<sup>th</sup> where he  
9 presented to you a draft letter from the mayor. And you went  
10 and got instructions and you discussed with the board and the  
11 board agreed, essentially, to go ahead with the proposed deal to  
12 move trucks out of the residential areas; is that ---

13 **MR. KEITH WILSON:** That's correct. And the  
14 proposal was not -- was never just to move up to Wellington. It  
15 was always recognized that probably only 25 percent of the  
16 vehicles could go to Wellington. The more dominant theme of the  
17 plan was for the vehicles to move to the remote locations at  
18 Embrun Exit 88 and Arnprior and to have -- expand the shuttle  
19 busses that were already running.

20 And there was also -- this is a very important  
21 point and I don't know that it's come out yet, is a lot of  
22 people who were there, the truckers, never planned to stay that  
23 long but the Canadians they met along the way, and the stories  
24 and the heartache that they heard, and the trust and plea that  
25 they heard from those people, many of the truckers I talked to  
26 felt this obligation to stay as long as they could but they also  
27 needed a way to leave gracefully and respectfully. And one of  
28 the things we recognized was that if 75 percent of the vehicles

1 were going to be given an opportunity leave and go out to Embrun  
2 or Arnprior, that some would actually use it as an opportunity  
3 to go home and do so respectfully. So that was an important  
4 part of the plan.

5 **MR. JEFFREY LEON:** And that's what you referred  
6 to in your statement as an "exit strategy"?

7 **MR. KEITH WILSON:** Correct.

8 **MR. JEFFREY LEON:** And in that regard, if you can  
9 bring up, please, HRF00001278. And this is an email. It starts  
10 at the top, February 12<sup>th</sup>, from you?

11 **MR. KEITH WILSON:** It's in reverse chronological  
12 order, so that would be the latest response. I had prepared --  
13 following the Board meeting on the Friday evening where the  
14 Board decided to approve the deal, they were all there in person  
15 except for Mr. Dichter, who was incapacitated due to his broken  
16 leg and had to stay at the Sheraton, but we had him join by  
17 conference call.

18 And because of the significance of this, even  
19 though on Friday they had all agreed to proceed to proceed with  
20 the deal with the mayor, I wanted to get something documented,  
21 so I sent an email to all of the Board. You can see where it  
22 says right just by where the mouse is, a little bit up and to  
23 the left, GIDG. That's part of Brigitte Belton's email address.  
24 You'll also see -- you can see Mr. Dichter's emails on this as  
25 well. It's the first one on the CC line, actually.

26 And I received responses from everyone approving  
27 it. It makes reference to the arrangement with the mayor. The  
28 plan was how are we going to get the truckers on side? So the

1 decision was made to do this Freedom Manifest document where  
2 Tamara, with all the Board members, signing at the bottom, would  
3 say, "It's time. We've had an impact. It's time to do  
4 something differently. It's time for us to focus our presence  
5 on Wellington where our beef is with the federal government,"  
6 for them, and for them to have the other trucks move out to the  
7 other locations.

8 **MR. JEFFREY LEON:** And if you can just scroll up,  
9 please? There, stop right there.

10 You say in that email from February 12th at 3:47,  
11 you indicate that the drafting committee had looked into a way  
12 to draft a document that would describe the Freedom Convoy's  
13 overall demands of all governments and a way forward strategy.

14 And so they were working on the broader document  
15 for review by the Board tomorrow, but you're circulating a draft  
16 now as a -- what is intended to be a communication for the  
17 captains and truckers regarding the deal with the mayor.

18 And then you say on the -- what's the end of that  
19 line after Wellington and Elgin:

20 "While at the same time, taking away  
21 the excuse that Trudeau wants to  
22 unleash the police goons and seize  
23 trucks. Remember, we are trying to  
24 block Trudeau from having the  
25 justification to cause the police to  
26 use the new emergency powers against  
27 the truckers and allow the truckers to  
28 stay here in Ottawa for as long as it

1 takes, et cetera."

2 Now, this is February 12th. At that point in  
3 time, did you anticipate use of the *Emergencies Act*?

4 **MR. KEITH WILSON:** Yes.

5 **MR. JEFFREY LEON:** And further, there's -- if --  
6 rather than looking at what's the draft, can we pull up -- 0000

7 ---

8 **COMMISSIONER ROULEAU:** Sorry, sorry. Excuse me.

9 **MR. PAUL CHAMP:** I apologize, Mr. Leon,  
10 Commissioner. I'd just like to just make a note on the record  
11 or perhaps a small objection. Ms. Belton testified yesterday  
12 that -- on the mayor's deal, and it was her understanding that  
13 it was all completely fake news, I think, was the terminology  
14 she used. And as I understand it, Mr. Wilson is now testifying  
15 that this deal was sent to Ms. Belton as one of the convoy  
16 organizers and that they all agreed to it. I just note, in  
17 fairness to the witness, I don't think that was put to her by  
18 the Commission, nor the convoy organizers or Freedom Corp.

19 So I mean, we're all working very hard,  
20 herculean, and we're missing lots of things at times, just  
21 because of the pace, but I think this is a rather important  
22 point, that it's unfortunate we didn't hear from Ms. Belton on  
23 that issue.

24 **COMMISSIONER ROULEAU:** Well, I think at this  
25 stage, let's hear the evidence and maybe that's a point that can  
26 be made later?

27 But I'm sorry. You want to also involve yourself  
28 in this?

1           **MR. BRENDAN MILLER:** Yes, sir. I don't think the  
2 issue is whether or not Ms. Belton's being impeached. Frankly,  
3 I don't think it matters. So this Commission doesn't need to  
4 make a finding of credibility of Ms. Belton, so I understand my  
5 friend's concern and he's turning to the rule of *Browne v Dunn*,  
6 but I don't really even think it's a concern, sir.

7           **COMMISSIONER ROULEAU:** No. Okay.

8           **MR. JEFFREY LEON:** HRF00001285. And this is the  
9 Freedom Manifest that was -- I think there were -- you said  
10 there were about maybe 100 copies made up and distributed to the  
11 truckers?

12           **MR. KEITH WILSON:** That's correct. About 850  
13 copies were printed. We decided to go old school, Gutenberg  
14 printing press. In fact, I took a little video and had  
15 forwarded it to Dean French so that he could see that progress  
16 was being made on the efforts and the plan to get the  
17 information out to the truckers. Chris Barber, Tamara, and  
18 others went out onto the streets and met with truckers, and the  
19 road captains handed these out. And Tamara even went out to  
20 Arnprior and Embrun to inspect them to make sure that they had  
21 sufficient capacity to take all the 75 percent of the vehicles  
22 and to meet with the owners of those lands to make sure they  
23 were comfortable with that many vehicles showing up in the  
24 coming days.

25           **MR. JEFFREY LEON:** Okay. And I'm not going to  
26 ask they be pulled up now, but just for the record, we then had  
27 the exchange of letters between the mayor and Ms. Lich, which  
28 we've seen. The mayor's letter is HRF00001264 and the -- and

1 Ms. Lich's letter is HRF00001275.

2                   And can I now ask to bring up HRF00001323? And  
3 this is a document dated February 17, 2022, open letter to our  
4 premiers and to our elected and appointed officials. It's a  
5 long letter, but I take it that the idea of this was still part  
6 of the exit strategy to do something to make contact with  
7 government officials so that people could be satisfied that  
8 you'd done all you could do to that point; is that fair?

9                   **MR. KEITH WILSON:** Yeah, it is. And I think what  
10 we were hoping would happen is that the success that we felt we  
11 could achieve with the arrangement and the agreement with the  
12 mayor, and because if it was successful, we were going to have  
13 had the downtown cleared out by the Wednesday but for Wellington  
14 up to the Sir John A., and you know, a defined area -- which  
15 they actually in logistics meetings shored it up because of the  
16 issues about the hospital and so on access, and the truckers  
17 agreed to make it even a smaller area -- said it was focus the  
18 protest now on the federal government and then the federal  
19 government would be encouraged by the fact that the truckers  
20 proved to be honest brokers, and that would lead to a meeting  
21 with some federal ministers. There was not a strong desire to  
22 have a meeting with the prime minister. It was more with the  
23 ministers, and that we could agree on a process of formally  
24 presenting briefs and information and scientific information to  
25 support -- and comparative information, because Canada was  
26 anomaly at this time in terms of our mandates; the other G7  
27 countries weren't doing these things -- to try and persuade the  
28 government to review its policies.

1           **MR. JEFFREY LEON:** Thank you. And then we don't  
2 have to bring it up, but in your statement, page 10 and 11, you  
3 outline your understanding of what happened in terms of the  
4 movement of the trucks outside from the residential area, either  
5 to leave or up to Wellington, correct?

6           **MR. KEITH WILSON:** Yeah. Well, I was directly  
7 involved, and on the Monday, and my text messages and my phone  
8 logs confirm it, my text messages with Sgt. Le, with the mayor's  
9 chief of staff and with the city manager. We -- the reports I  
10 was getting from the ground were that the police were not in a  
11 position, they were getting blocked at different phases by the  
12 police. They finally got some trucks moved. We were ready to  
13 move trucks again on the Tuesday. Chris had worked and others,  
14 Joe Janz and Ryan and Dale and others had gone out and worked  
15 hard to get a whole bunch of trucks ready to move on the  
16 Tuesday. Police completely blocked it. We now see all the bad  
17 communications and infighting that was going on. We didn't know  
18 that at the time, obviously, and then again, on the Wednesday.  
19 And the other thing is, we realized, when we discussed it and I  
20 listened to the road captains and to the Chris Barbers, is they  
21 felt that once the big trucks moved, there would be stragglers,  
22 but they wouldn't want to be alone, and that they would either  
23 leave or they may go and infill a little bit, but so we  
24 recognized that.

25           And there was also discussion that if -- and this  
26 is controversial, but there was also discussion that if we get  
27 down to a few areas where everybody else has either gone up to  
28 Wellington, or gone out to the base camps, or gone home, and we

1 have a few holdouts, that Freedom Corp. would no longer provide  
2 any supplies, fuel, or materials to those areas to incentivize  
3 them to follow the lead of everyone else who was leaving  
4 downtown.

5 **MR. JEFFREY LEON:** Thank you. I see -- I've gone  
6 up for my hour-and-a-half, Commissioner. I have two more points  
7 to deal with, if I could.

8 **COMMISSIONER ROULEAU:** Sure.

9 **MR. JEFFREY LEON:** Thank you.

10 HRF00001298. This is a letter that you sent to  
11 Chief Bell stating your view on the powers that were -- the  
12 police were given under the *Emergency Act*.

13 **MR. KEITH WILSON:** M'hm.

14 **MR. JEFFREY LEON:** And you took issue with  
15 whether there was the power to prevent peaceful protesters from  
16 coming into Ottawa to protest.

17 **MR. KEITH WILSON:** Correct. And just to clarify,  
18 the letter's signed by Ms. Chipiuk, but I did review the letter,  
19 and we also had at least four or five other lawyers from the  
20 Justice Centre reviewing the same statutory regulatory  
21 instruments, and we had all reached the same conclusion that the  
22 description that the government officials and the police were  
23 using to describe the measures was not even close to what the  
24 Emergency Proclamation actually said, and that as long as you  
25 were not seeking to interfere with international trade, disrupt  
26 or interfere with critical infrastructure or engage in serious  
27 acts of violence against persons, you continued to have the  
28 right of political advocacy, protest and dissent. And so the



1 labelling by the Police Chief and others that any Canadian  
2 citizen was no longer allowed to walk in downtown Ottawa or hold  
3 a sign in front of their Parliament is -- was not legally  
4 accurate and was against the *Charter*.

5 **MR. JEFFREY LEON:** And I think we've seen the  
6 video that's -- and you don't have to bring it up, HRF00000274,  
7 that you did with Mr. Barber to -- essentially giving that  
8 opinion and telling whoever saw the video that they could and  
9 should come to Ottawa and continue lawful protest.

10 **MR. KEITH WILSON:** I had -- we were in the  
11 seventh-floor boardroom at the Sheraton. I'd just finished  
12 briefing the Board on the legal review that had been completed  
13 of the proclamations, and Mr. Barber turned to me and said,  
14 "Come over here. Sit on the arm of the chair. Let's do a Tik  
15 Tok." And it literally happened that quick.

16 **MR. JEFFREY LEON:** And in making that Tik Tok  
17 video, was it your understanding that there was about to be an  
18 enforcement initiative by the police to remove people from the  
19 red zone?

20 **MR. KEITH WILSON:** I didn't know for sure. What  
21 I did know is that there was numerous times where information  
22 would come into the Operations Centre from various police  
23 sources that a raid was imminent and it happened many times, and  
24 then the raids either did occur in part, such as Coventry, or  
25 other evenings where they would go and take firewood and fuel or  
26 food from one of the blocks. But it did appear from the buildup  
27 we were seeing on the ground, it was obvious and the information  
28 we had about a number of -- I don't know, there's some Lansdowne

1 Park or someplace had been set up as a processing centre, so it  
2 seemed that there is a shift occurring.

3 **MR. JEFFREY LEON:** And did you have a concern  
4 that -- about the fact that if that was going to happen, you  
5 were suggesting to people to come back into the red zone and  
6 potentially be in danger when the enforcement action started?

7 **MR. KEITH WILSON:** No, because I'm a Canadian and  
8 I never imagined that our government, our federal government  
9 would use that level of force against non-violent, peaceful  
10 Canadians.

11 **MR. JEFFREY LEON:** And just a couple of final  
12 points, we heard Ms. Belton's evidence that her hotel bill had  
13 been paid by Mr. Berogot (ph)?

14 **MR. KEITH WILSON:** Bourgault.

15 **MR. JEFFREY LEON:** Bourgault. Have you ever met  
16 Mr. Bourgault?

17 **MR. KEITH WILSON:** Yes, I met Joseph a number of  
18 times. He's an amazing human being and very concerned Canadian,  
19 but I have no knowledge of any bills he was paying.

20 **MR. JEFFREY LEON:** Who paid your hotel bill?

21 **MR. KEITH WILSON:** Who would have paid my hotel  
22 bill? I'm pretty sure the first hotel bill went on my firm visa  
23 card, and then I was reimbursed by the Justice Centre. The  
24 Germain was on my visa card and was reimbursed. And then the  
25 Swiss was paid for, I believe, I don't know this with certainty,  
26 by Chris Garrah through Adopt A Trucker.

27 **MR. JEFFREY LEON:** Thank you. And do you have  
28 any other information about Mr. Bourgault about contributions he

1 may have made to the Freedom Convoy in terms of how much or what  
2 for?

3 **MR. KEITH WILSON:** No. I do know that he helped  
4 pay for some meeting rooms. I don't think -- when Mr. Marazzo  
5 and Mr. Bulford were holding their press conferences at the Lord  
6 Elgin, I don't think he paid for that, but he might have. And  
7 it was mostly -- the only firsthand knowledge I have was hotel  
8 rooms.

9 **MR. JEFFREY LEON:** And then there's two other  
10 documents that I want to ask you about. The first one is  
11 HRF000000 -- just let me get it here -- 83. And this was a  
12 press release February 17, 2022, from the Freedom Convoy  
13 indicating that they did not support any of the comments being  
14 made by Mr. King. I may have asked you this, but had you met  
15 Mr. King?

16 **MR. KEITH WILSON:** I knew of Mr. King prior --  
17 over a year prior to going to Ottawa. He had a court matter in  
18 Red Deer where he was all over social media saying that he's  
19 found this magic recipe for defeating all government laws, and I  
20 researched it, read the court's decision, and it was clear he  
21 was misunderstanding how the law works. So I knew of him from  
22 then and I knew that he was a very loud voice. When I found out  
23 that he was here, I told him I was -- I told the clients I  
24 wasn't prepared to be in the same room with him. There was one  
25 instance where he was brought into a room, and I immediately  
26 requested that he leave. The reason was that I had heard of his  
27 language at times, and maybe it was unfair to him, maybe I was  
28 duped by the media. I don't know, but there was inuendo of

1 violence, and it was completely unacceptable to me, but more  
2 importantly, Ms. Lich. Because the Legacy media was repeating  
3 it so many times and it was needing to be explained so many  
4 times, the Board made the decision to issue this press release.  
5 This is the only press release of this nature that was issued  
6 where they identified a person and made it clear that they did  
7 not agree with, as it says, "He does not speak for us. We  
8 expressly condemn any talk of violence from him or others."

9 **MR. JEFFREY LEON:** Thank you. And then the final  
10 document HRS000000513 page 3. I just wanted to ask you about  
11 this. This is one of your, I believe, text messages right  
12 there. If you can roll it up a little bit more. Right there.

13 I believe this is -- this is dated at the top  
14 February 9<sup>th</sup>. Did you appear on FOX News?

15 **MR. KEITH WILSON:** That's correct.

16 **MR. JEFFREY LEON:** And how did that come about?

17 **MR. KEITH WILSON:** I received on a daily basis  
18 10, 20 or more media requests. Everyone from the New York  
19 Times, Washington Post, BBC, France 24, Belgium, Caribbea, Japan  
20 and every Canadian news outlet. I did agree to do one interview  
21 and I agreed to go on FOX with Premier Peckford.

22 **MR. JEFFREY LEON:** And that's Premier Peckford on  
23 the right?

24 **MR. KEITH WILSON:** That's correct.

25 **MR. JEFFREY LEON:** Thank you. Thank you, sir.  
26 Those are my questions.

27 And thank you, Commissioner, for the extra time.

28 **COMMISSIONER ROULEAU:** Okay. So we're pretty

1 close to the time for the morning break so I'm going to take a  
2 15 minute break and we'll come back and start with our list of  
3 cross-examinations.

4 **THE REGISTRAR:** The Commission is in recess for  
5 15 minutes. La Commission est levée pour 15 minutes.

6 --- Upon recessing at 11:16 a.m.

7 --- Upon resuming at 11:34a.m.

8 **THE REGISTRAR:** Order. A l'ordre.

9 The Commission is reconvened. La Commission  
10 reprend.

11 **--- MR. KEITH WILSON, Resumed:**

12 **COMMISSIONER ROULEAU:** Okay. The first up is for  
13 the Government of Canada

14 **--- CROSS-EXAMINATION BY MR. ROBERT MacKINNON:**

15 **MR. ROBERT MacKINNON:** Good morning. I'm Robert  
16 MacKinnon for the Government of Canada counsel.

17 **MR. KEITH WILSON:** Good morning.

18 **MR. ROBERT MacKINNON:** Mr. Wilson, I just want to  
19 take you to a point that you made at the end of your testimony  
20 with Commission Counsel. I don't know that we have to turn up  
21 the document, but it was in reference to an email of February  
22 12<sup>th</sup> that you had sent. And the line in there that I just want  
23 to clarify is where you say,

24 "We are trying to block Trudeau from  
25 having the jurisdiction to cause police  
26 to use the new emergency powers against  
27 the truckers and to allow the truckers  
28 to stay here in Ottawa as long as it

1 takes." (As read)

2 Do you remember that line?

3 **MR. KEITH WILSON:** I think you misspoke. I think  
4 you meant to say "justification." Does it say jurisdiction?

5 **MR. ROBERT MacKINNON:** Oh, having the -- okay,  
6 sorry, justification. Good memory. So is that not a reference  
7 to the Declaration of Emergency that was made the day before by  
8 the Ontario Premiere?

9 **MR. KEITH WILSON:** No.

10 **MR. ROBERT MacKINNON:** It does not speak into the  
11 future. It says to use the new emergency powers, which just  
12 came into effect the day before.

13 **MR. KEITH WILSON:** Was the -- we had -- so I had  
14 lawyers with me on the ground. I also had teams of lawyers that  
15 were back at their normal place of business. When an issue  
16 would arise, I would delegate it out. I would say, "Okay, this  
17 team in Toronto, I want you to review this." We even prepared a  
18 draft judicial review application for the -- both the City's  
19 Emergency Proclamation and the Ottawa -- or, sorry, the  
20 provincial government one. Media assessment is what does this  
21 change? What impact does it have on the rights of the people on  
22 the ground? And we concluded that it was largely benign.

23 **MR. ROBERT MacKINNON:** Okay. What I'm saying is  
24 that -- those words refer to the new emergency power in the  
25 present tense. The Declaration from the Federal Government came  
26 on the 14<sup>th</sup>. It was two days before.

27 **MR. KEITH WILSON:** Well, I can help you by  
28 telling you what was in my mind. And our concern was, I believe

1 that it was early in the previous week -- by early I mean the  
2 Tuesday, and if not Tuesday, the Wednesday for certain, that we  
3 started hearing rumours that the Federal Government was  
4 contemplating invoking the Federal *Emergencies Act*. So all of  
5 the references in any of the communications that you have at  
6 that time would be, unless there's one that's more specific,  
7 about that. There was -- we weren't concerned about the --  
8 either the civic one, nor the provincial one.

9 **MR. ROBERT MacKINNON:** Can you point me to one  
10 document which documents what you're just telling us now?

11 **MR. KEITH WILSON:** Well, first of all, this was  
12 not a normal file.

13 **MR. ROBERT MacKINNON:** Right. But you've managed  
14 to paper ---

15 **MR. KEITH WILSON:** Can I finish my ---

16 **MR. ROBERT MacKINNON:** Oh, sorry, okay.

17 **MR. KEITH WILSON:** --- can I finish my answer,  
18 please, sir? This was not a normal file. You did not -- I did  
19 not have opportunity to document things. And I'm telling you  
20 under oath that at no time was the -- either the Ottawa State of  
21 Emergency Declaration, nor the Ontario State of Declaration a  
22 matter of concern for me and the other lawyers with me. We were  
23 very concerned about the potential and the rumours we were  
24 hearing for the Federal Government to invoke the Federal  
25 *Emergencies Act*.

26 **MR. ROBERT MacKINNON:** Who told you the Federal  
27 Government was considering using the *Emergencies Act*? Who told  
28 you that?

1           **MR. KEITH WILSON:** I can't remember the specific  
2 individual, but I do remember the source that they relayed, and  
3 they advised that they had heard from some MPs that there was  
4 active discussion over at the Parliament about the Prime  
5 Minister considering using the *Emergencies Act*. And it was --  
6 so MPs, some MPs had shared with people involved in the convoy  
7 and they reported that to me.

8           **MR. ROBERT MacKINNON:** Do you have any document  
9 you can refer this Commission to today?

10          **MR. KEITH WILSON:** I might, but I can't recall  
11 any offhand.

12          **MR. ROBERT MacKINNON:** And you can't recall any  
13 offhand. You can't recall a description of the document or  
14 anything like that right now?

15          **MR. KEITH WILSON:** No, that's correct.

16          **MR. ROBERT MacKINNON:** All right. I'd like to  
17 continue with just confirming some statements from your witness  
18 summary. You'd agree that there was a broad array of groups  
19 that were part of this convoy?

20          **MR. KEITH WILSON:** Correct.

21          **MR. ROBERT MacKINNON:** And you subdivided them  
22 into three groups: those who came to support the movement,  
23 those who came to take it over ---

24          **MR. KEITH WILSON:** M'hm.

25          **MR. ROBERT MacKINNON:** --- and those who came to  
26 take a piece of the \$10 million.

27          **MR. KEITH WILSON:** That was my assessment.  
28 Probably I reached that conclusion in my mind within, I would



1 say, three to five days of being here. I'd had sufficient  
2 interactions and repeated interactions with different  
3 individuals from different groups that that was the pattern that  
4 I felt was present.

5 **MR. ROBERT MacKINNON:** And you also have said  
6 that the convoy attracted a lot of strange people.

7 **MR. KEITH WILSON:** Yeah.

8 **MR. ROBERT MacKINNON:** And in those people you  
9 mention the coven of witches?

10 **MR. KEITH WILSON:** That's what they called  
11 themselves and they were doing weird séance things and burning  
12 things in the lobby.

13 **MR. ROBERT MacKINNON:** And conspiracy groups like  
14 Diagonon ---

15 **MR. KEITH WILSON:** Yeah.

16 **MR. ROBERT MacKINNON:** --- QAnon? Yes?

17 **MR. KEITH WILSON:** Yeah, you bet.

18 **MR. ROBERT MacKINNON:** Yeah. So it not only  
19 consisted of a broad array of groups but it attracted other  
20 strange groups that at least how you've described them; correct?

21 **MR. KEITH WILSON:** Like moths to a flame.

22 **MR. ROBERT MacKINNON:** So you'd agree that some  
23 of these individuals, we've heard a little bit already, may have  
24 tried to hijack the message or even try and control, perhaps,  
25 parts of the convoy group; is that correct?

26 **MR. KEITH WILSON:** Yes, and it was a constant  
27 effort by Ms. Lich and Mr. Barber and others to fend them off,  
28 so to speak. And I do recall reading documents in the record

1 where CSIS and the RCMP had also intercepted communications and  
2 reached the same conclusion, that there was a concerted effort  
3 by the mainstream group to resist these hangers ons.

4 **MR. ROBERT MacKINNON:** Okay. And Mr. Barber  
5 testified yesterday that he could not control truckers  
6 generally. They're very independently minded, and certainly not  
7 the groups that were coming. Would you agree with that  
8 statement?

9 **MR. KEITH WILSON:** That's correct. Yes, I would  
10 agree.

11 **MR. ROBERT MacKINNON:** And there's a -- Mr. Ero's  
12 interview summary that you've been taken to a little bit, a  
13 reference to, or at least a quote that you supposedly mention  
14 concerning Taking Back our Freedoms group?

15 **MR. KEITH WILSON:** Yes.

16 **MR. ROBERT MacKINNON:** Did you refer to them as  
17 "bad actors"?

18 **MR. KEITH WILSON:** I don't think I would have  
19 referred to -- no, I don't know that I would have referred to  
20 them as bad actors.

21 **MR. ROBERT MacKINNON:** Okay. He says you did.

22 **MR. KEITH WILSON:** No.

23 **MR. ROBERT MacKINNON:** And bad actors and  
24 manipulators he says.

25 **MR. KEITH WILSON:** I would have characterized  
26 without a doubt some of the individuals involved with that group  
27 as being manipulative, a hundred percent.

28 **MR. ROBERT MacKINNON:** So even within your group,

1 the convoy group and the leadership that you've mentioned, there  
2 were, would you say, sort of divisions or factions I would say?

3 **MR. KEITH WILSON:** Absolutely. It was an  
4 incredibly diverse, dynamic -- remember, that if you walked into  
5 the Operation Centre at any given moment and said how many  
6 people in this room knew one another before January 15<sup>th</sup>, and the  
7 only 2 people would put up their hands would be Chris Garrah and  
8 Chad Eros. These people all came together for the first time.

9 **MR. ROBERT MacKINNON:** All right. And you  
10 mentioned the negotiations with the City of Ottawa in the days  
11 leading up to February 14<sup>th</sup>?

12 **MR. KEITH WILSON:** Yes.

13 **MR. ROBERT MacKINNON:** To move the trucks out of  
14 residential neighbourhoods to take at least a bit of a valve to  
15 some of the temperature that had been raised with all the  
16 complaints and issues that arose from that. That's correct?

17 **MR. KEITH WILSON:** Yeah, and the tensions with --  
18 -

19 **MR. ROBERT MacKINNON:** Yeah.

20 **MR. KEITH WILSON:** --- the police and the  
21 political tensions. It was time to deescalate and reduce the  
22 footprint and relieve the pressure.

23 **MR. ROBERT MacKINNON:** But that was never  
24 intended to rid the city core of the gridlock of 30-ton trucks  
25 or resolve the grievances of all the various protesting groups.

26 **MR. KEITH WILSON:** There was no gridlock. I've  
27 described how I was able to travel freely.

28 **MR. ROBERT MacKINNON:** Well, let's just say,

1 you're not saying that it was empty of 30-ton trucks sitting in  
2 front of Wellington?

3 **MR. KEITH WILSON:** No, the idea was to  
4 concentrate, and this was discussed in the negotiations with the  
5 Mayor. The Mayor's message that I received through Mr. French  
6 was that he recognized that the grievance -- I think it's even  
7 in his letter, if I'm not mistaken -- that was with the Federal  
8 Government primarily was the triggering event, the federal  
9 mandates that you've heard about.

10 **MR. ROBERT MacKINNON:** But your deal ---

11 **MR. KEITH WILSON:** I just -- sorry, sir, I  
12 haven't finished and I'm just -- that was slowing down because I  
13 -- Commissioner has reminded me that I'm speaking too fast. So  
14 it was recognized that trucks would remain on Wellington. And  
15 to be clear, there was no understanding that it would be a grant  
16 of immunity. It was recognized that at any time after those  
17 trucks repositioned, the police could come and move them out.  
18 It was recognized that there would be an interference in the  
19 flow of traffic on Wellington but I note, because I was up there  
20 the other day, it's blocked today, this very moment, by  
21 government barricades.

22 **MR. ROBERT MacKINNON:** I'm just getting to the  
23 point that the deal was never intended to resolve all these  
24 grievances and protests and to get rid of the trucks from the  
25 city core; correct?

26 **MR. KEITH WILSON:** No, it was absolutely to  
27 remove the pressure on the downtown residents and business,  
28 focus the attention on the grievance with the federal

1 government, build from the success of de-escalation and  
2 negotiation to incentive and encourage the federal government to  
3 come to the table, open up a dialogue and set a pretext for the  
4 truckers to go home.

5 **MR. ROBERT MacKINNON:** How does -- well, would  
6 you be surprised that the mayor would say that the deal wasto  
7 release some of the tension from the neighbourhoods. It did  
8 nothing to deal with the core issue of getting rid of the trucks  
9 in front of Wellington.

10 **MR. KEITH WILSON:** I don't know. Do you want me  
11 to repeat my answer a third time?

12 **MR. ROBERT MacKINNON:** No, I don't need -- I  
13 don't need that, but I've got your answer. So you don't agree  
14 that this was -- this deal was intended to resolve all these  
15 issues and gridlock on Wellington?

16 **MR. KEITH WILSON:** Complex problems require  
17 complex solutions. Complex solutions require phasing.

18 **MR. ROBERT MacKINNON:** So you had faith?

19 **MR. KEITH WILSON:** I had faith. I had confidence  
20 of the good will of the -- of -- look ---

21 **MR. ROBERT MacKINNON:** Do we have an agreement, a  
22 written agreement that said they would move?

23 **MR. KEITH WILSON:** I have been able to resolve at  
24 least more than 90 percent of all the litigation files I've been  
25 involved in by opening up dialogue between the parties and I  
26 remained optimistic that through applying those skills and those  
27 tactics that we could have had a peaceful resolution and a  
28 respectful Canadian dialogues about important policy issues.

1                   **MR. ROBERT MacKINNON:** Who were you representing  
2 at the negotiations? Were you representing the leadership that  
3 you mentioned, the directors of that company, the non-profit  
4 company, the Freedom 2022, the President, Tamara Lich, and the  
5 Vice President, Chris Barber, and the treasurer, Chad Eros?  
6 Beyond those people, who were your clients?

7                   **MR. KEITH WILSON:** You've described them. That's  
8 accurate.

9                   **MR. ROBERT MacKINNON:** So you were not acting on  
10 behalf of all the truckers?

11                   **MR. KEITH WILSON:** That's correct.

12                   **MR. ROBERT MacKINNON:** So you had faith?

13                   **MR. KEITH WILSON:** I had faith and my faith in  
14 the same way -- I would have quit practicing law, sir, a long  
15 time ago if I didn't have faith in the ability of people having  
16 civil and respectful discussions to resolve disputes.

17                   **MR. ROBERT MacKINNON:** But the objective of that  
18 agreement was to move 25 percent more trucks into the Wellington  
19 Street area, so it doesn't do anything to relieve that  
20 congestion.

21                   **MR. KEITH WILSON:** It -- fair, but we've already  
22 established, sir, that the road's blocked. So if -- I'm not  
23 sure if your concern is about the presence of trucks and  
24 Canadians or whether your concern is about the road being  
25 blocked. It can't be the road being blocked because it's still  
26 blocked to this day by the government.

27                   **MR. ROBERT MacKINNON:** You have heard or you're  
28 evidence given at this inquiry of the racial slurs, the

1 intimidation ---

2 **MR. KEITH WILSON:** M'hm.

3 **MR. ROBERT MacKINNON:** --- the threats against  
4 Ottawa residents and public officials, and the blaring high-  
5 decibel horns at all times of day and night during these  
6 demonstrations in Ottawa; you're aware of that evidence,  
7 correct?

8 **MR. KEITH WILSON:** I'm aware of the allegations -  
9 --

10 **MR. ROBERT MacKINNON:** Okay.

11 **MR. KEITH WILSON:** --- and I'm also aware of what  
12 I experienced, which was Canadians, particularly immigrants of  
13 all ethnic backgrounds, coming together in a very peaceful,  
14 respectful way with deep concern about what the federal  
15 government and governments were doing to their rights and  
16 freedoms.

17 **MR. ROBERT MacKINNON:** I'm just talking about  
18 those particular allegations right now, okay?

19 **MR. KEITH WILSON:** Yes.

20 **MR. ROBERT MacKINNON:** As a lawyer, you would  
21 agree that those are not protected as a form of free speech or  
22 action under the Charter?

23 **MR. KEITH WILSON:** No, I don't know that I'd  
24 agree with that. I'd need -- you have to be very contextual-  
25 specific. Our free speech rights are very broad and just to say  
26 that someone made some vague allegation of racism is not enough  
27 for me or anyone else to make a reasoned conclusion.

28 **MR. ROBERT MacKINNON:** You agree, hate speech has

1 been codified in the Criminal Code, right?

2 **MR. KEITH WILSON:** Yes, and I find the Prime  
3 Minister's hate speech towards unvaccinated people and saying,  
4 "How do we deal with these people," deeply troubling.

5 **MR. ROBERT MacKINNON:** Right. So you don't  
6 agree, then, that threats against the life of somebody is not a  
7 protected form of speech under the Charter?

8 **MR. KEITH WILSON:** I do not believe that anyone,  
9 either morally or legally, should be threatening anyone else's  
10 life and I have received many death threats myself since  
11 representing the Freedom Convoy.

12 **MR. ROBERT MacKINNON:** Okay. So we agree that  
13 that's not protected, right? Death ---

14 **MR. KEITH WILSON:** Yes.

15 **MR. ROBERT MacKINNON:** --- threats are not  
16 protected?

17 **MR. KEITH WILSON:** Correct.

18 **MR. ROBERT MacKINNON:** Nor is speech that is  
19 linked to demean, to an extent, a particular group of people in  
20 a serious way? Hate speech ---

21 **MR. BRENDAN MILLER:** Sir, I'm going to have to  
22 object at this time. My friend is entirely mischaracterizing  
23 the Law of Section 2(b) of the Charter and the decisions in  
24 respect to that. In fact, the Supreme Court of Canada, of  
25 course, has held that hate speech, other than inciting violence,  
26 is actually protected by Section 2(b) of the Charter. And so I  
27 would ask that my friend, essentially, cease putting errors of  
28 law to the witness on public television, sir.



1                   **MR. ROBERT MacKINNON:** I am just asking for his  
2 view as a lawyer. But I don't have to continue. I have other  
3 questions, Your Honour.

4                   **THE REGISTRAR:** Mr. Commissioner, I hate to  
5 interrupt the proceedings but I've received an email  
6 communication from our certified transcriptionists asking if  
7 parties, when they're making objections from the floor to please  
8 state their name first. Thank you, Mr. Commissioner.

9                   **COMMISSIONER ROULEAU:** Okay. I think this is  
10 proper cross-examination so I'm not -- go ahead.

11                   **MR. ROBERT MacKINNON:** Okay. So you'd agree,  
12 trucks do not have Charter rights?

13                   **MR. KEITH WILSON:** Yes, obviously.

14                   **MR. ROBERT MacKINNON:** Good. And you don't have  
15 the right to park somewhere for three weeks wherever you want  
16 whenever you want?

17                   **MR. KEITH WILSON:** I was asked many times every  
18 day by truckers when they recognized me, and they would say,  
19 "Mr. Wilson, am I allowed to have my truck here?" And if they  
20 were parked in the parking lane, I would say, "It depends. What  
21 does the sign say about how long you can park? You might get a  
22 ticket." If they were parked in a driving lane, I had the same  
23 response to all of them, which was, "You tell me this. If you  
24 were to stop your truck in the number 2 lane on the 401, then  
25 get out and leave it, what would happen?" And they would say,  
26 "The OPP would come, they would ticket it, and they would tow it  
27 away." I said -- I would say to them, "You're in the exact same  
28 situation here. No, you cannot lawfully park your truck there."

1 There is an interesting argument because they were told to park  
2 there by the police as to whether they might have an officially  
3 induced error defence, but that was the answer that I would give  
4 them.

5 **MR. ROBERT MacKINNON:** Okay. You'd agree, it's  
6 not a protected right under the Charter?

7 **MR. KEITH WILSON:** Of course.

8 **MR. ROBERT MacKINNON:** Okay. And neither is  
9 blaring high-decibel horns a protected form of free speech or  
10 action under the Charter?

11 **MR. KEITH WILSON:** Well, there was -- and I'm not  
12 trying to be cute about this but you're asking me a very nuanced  
13 question because Charter rights, especially when you get into  
14 freedom of expression, are nuanced, is there were times where  
15 these dance parties on the weekend -- and I said this, and it's  
16 in the transcript when I was before Justice McLean, because we  
17 did have a discussion about whether there was an artistic  
18 element -- and the trucks would start -- with the different  
19 frequency of their horns would start doing dance beats, so there  
20 was that. But it's clear Ms. Lich and Mr. Barber were clear  
21 that they did not want the horns. Before the injunction -- the  
22 week before the injunction, the truckers agreed amongst  
23 themselves to have a quiet time from 8:00 p.m. to 8:00 a.m.  
24 because they wanted to get sleep, too. The injunction allowed  
25 that to be expanded.

26 **MR. ROBERT MacKINNON:** Well, people weren't  
27 dancing to these horns that were going all hours of the day and  
28 night. You've heard the evidence from the residents?

1                   **MR. KEITH WILSON:** I witnessed people dancing a  
2 lot to the horns with the music. I'm sorry, sir, that's what I  
3 saw. I'm under oath.

4                   **MR. ROBERT MacKINNON:** Yes, at one in the  
5 morning, three in the morning?

6                   **MR. KEITH WILSON:** Yes.

7                   **MR. ROBERT MacKINNON:** And -- okay. I won't go  
8 in ---

9                   **MR. KEITH WILSON:** I wasn't on the street at  
10 three in morning so I can't say but I was at least once or twice  
11 leaving meetings at one in the morning.

12                   **MR. ROBERT MacKINNON:** I've got your perspective.  
13 Do you recall a second press conference that you gave with  
14 others on February 6<sup>th</sup>? So this one, you were more organized.  
15 If I could up Document COM, I think it's five zeroes, 856. It's  
16 a transcript of that. There, you attended Ms. Lich, Mr.  
17 Bulford, Mr. Dichter, and Tom Quiggin -- is that how you  
18 pronounce his name?

19                   **MR. KEITH WILSON:** Yes.

20                   **MR. ROBERT MacKINNON:** Okay. Do you recall that?

21                   **MR. KEITH WILSON:** I believe that was a press  
22 conference that Mr. Dichter has asked that was primarily focused  
23 on Bitcoin. It was in the Sheraton Hotel and I and Ms. Lich  
24 were asked to come to attend the first part of it to provide a  
25 legal update and an operational update on where things were at.

26                   **MR. ROBERT MacKINNON:** So these were people who  
27 are all part of your group; is that right, so Tom Quiggin, Mr.  
28 Dichter, Mr. Bulford, Ms. Lich, that they're all part of your

1 convoy group leadership, would you say, or part of your working  
2 group?

3 **MR. KEITH WILSON:** They're part of the Freedom  
4 Convoy. That's about as far as I'd be prepared to go.

5 **MR. ROBERT MacKINNON:** Okay. And you worked  
6 together?

7 **MR. KEITH WILSON:** I worked with lots of people  
8 every day on a wide variety of issues.

9 **MR. ROBERT MacKINNON:** And Tom Quiggin is an ex-  
10 military intelligence officer, correct?

11 **MR. KEITH WILSON:** That's my understanding.

12 **MR. ROBERT MacKINNON:** And he worked in the  
13 operation centre; is that right?

14 **MR. KEITH WILSON:** He was mostly -- I almost  
15 never saw him in the operation centre at the Swiss. He was  
16 almost always at the ARC and he was doing these, on his own  
17 initiative, these daily situation briefs. They were not  
18 reviewed by anybody. In fact, I still haven't even read most of  
19 them. We had no time to even read them and he was circulating  
20 them to the truckers.

21 **MR. ROBERT MacKINNON:** Now -- so he did write  
22 daily intelligence reports and special intelligence reports on  
23 certain events, correct?

24 **MR. KEITH WILSON:** That's my understanding, yes,  
25 and I've read some of them since preparing for this.

26 **MR. ROBERT MacKINNON:** And do you place credence  
27 in his assessments?

28 **MR. KEITH WILSON:** Sometimes I did and sometimes

1 I didn't.

2 **MR. ROBERT MacKINNON:** Are you -- okay. Well, we  
3 could take you to who he is first. Page 12 of this document  
4 where it has his -- Tom Quiggin's -- if you go down to line 12 -  
5 - so are we on the right -- page 12 -- I've got page 12 here.  
6 Yeah, that's it. Yeah.

7 So it says -- he describes himself:

8 "I'm ex-military intelligence. I also  
9 worked for the RCMP for six years in  
10 national security, the Integrated  
11 National Security Enforcement Team.  
12 I'm one of the few court experts in the  
13 country on terrorism and I'm a declared  
14 court expert both in criminal court,  
15 which is to say Ontario Superior Court,  
16 as well as the federal court."

17 Do you see that?

18 **MR. KEITH WILSON:** Yeah. I've since reviewed his  
19 CV and confirmed these things to be true.

20 **MR. ROBERT MacKINNON:** Okay. And he did put out  
21 reports every day, right?

22 **MR. KEITH WILSON:** I don't know if it was every  
23 day. I -- it was a few days in that I learned that these things  
24 were occurring. I think they were distributed to the block  
25 captains, if I'm not mistaken, in the morning.

26 **MR. ROBERT MacKINNON:** Yeah. So ---

27 **COMMISSIONER ROULEAU:** I'm going to have to get  
28 to point quite quickly. You're already over time.

1                   **MR. ROBERT MacKINNON:** Oh, okay.

2                   My -- well, I'll take you to one of the threat  
3 assessments right now, all right, one of the daily assessments.  
4 It's Document HRF00000018.

5                   So you'll agree that there were people attracted  
6 to the convoy, not only strange, but who had violent tendencies,  
7 if you could look here.

8                   So this is on February 3rd. This is the day I  
9 think you arrive.

10                  Here, the assessment is:

11                                 "Freedom Convoy 2022 assess that  
12                                 potentially violent protestors may  
13                                 arrive in Ottawa to vandalize property.  
14                                 Following that, they will then attempt  
15                                 to blame convoy members for the violent  
16                                 actions. The protestors are likely to  
17                                 arrive in Ottawa either late Wednesday  
18                                 or Thursday. The violent actions are  
19                                 likely intended for Thursday and  
20                                 Friday. The actions from the  
21                                 protestors are likely to consist of  
22                                 harassment of citizens and damage to  
23                                 vehicles and properties."

24                  And then they describe how they're going to be  
25 dressed. Do you see that?

26                  **MR. KEITH WILSON:** Yeah. I recall that. In  
27 fact, we were -- received a separate briefing and this actually  
28 was raised by GoFundMe executives and their legal team on our

1 call on the Thursday. And it was Antifa. They had previously  
2 come in on occasion and knifed trucks, cut the air lines,  
3 stabbed -- knifed tires, and they had announced on social media,  
4 I was told, the Antifa group, that they were going to be coming  
5 in a larger numbered force and trying to do more damage to the  
6 trucks.

7 **MR. ROBERT MacKINNON:** So if I might ask one more  
8 question, Mr. Commissioner, just on -- it's on a document that  
9 the transcript, if you could pull up the transcript again, it's  
10 page 14. It has to do with tow trucks, an issue that everybody  
11 seems to have an opinion on.

12 So this is Tom Quiggin again in the interview.  
13 That's right.

14 So he says concerning tow trucks:

15 "The short answer is tow truck  
16 companies right across the country, in  
17 Alberta, Ontario, whatever have either  
18 politely refused requests from the  
19 government to assist, or not so  
20 politely refused requests for  
21 assistance."

22 And if you turn over the page -- or sorry, go  
23 down to the bottom of that page first:

24 "But what it shows is, the federal  
25 government in Ottawa is reaching all  
26 the way down to Buffalo, New York,  
27 trying to find a tow truck, and they  
28 can't get one because the --- "

1 Turn over the page.

2 "--- trucking industry is somewhat of a  
3 brotherhood, much like the military,  
4 much like the police, and we do kind of  
5 all know each other, and no tow truck  
6 company that wants to be in business  
7 for more than a week after this is  
8 going to help out."

9 And it goes down a couple more paragraphs.

10 "So what's actually happening now, we  
11 have a network of tow truck operators  
12 who are talking to each other to see  
13 who's being called and who's not.  
14 Short answer is they're having a hard  
15 time getting tow trucks."

16 So was the convoy actively trying to prevent the  
17 use of tow trucks?

18 **MR. KEITH WILSON:** No, there was never any of the  
19 rooms I was in -- and I was usually with the leadership at all  
20 times -- any effort, attempt, or even discussion about reaching  
21 out to any tow companies to discourage them, and we know from  
22 the evidence from the police in the previous days of this  
23 inquiry that in fact, the governments were able to get tow  
24 trucks.

25 **MR. ROBERT MacKINNON:** So that contradicts what  
26 Mr. Quiggin just said in his press conference on February 6th.

27 **MR. KEITH WILSON:** And corroborates my evidence  
28 that sometimes I agreed with him and sometimes I didn't.



1                   **MR. ROBERT MacKINNON:** Thank you.

2                   **COMMISSIONER ROULEAU:** Okay. The Ottawa Residents  
3 Coalition, please.

4                   **--- CROSS-EXAMINATION BY MR. PAUL CHAMP:**

5                   **MR. PAUL CHAMP:** Paul Champ for the Ottawa  
6 Coalition of Residents and Businesses.

7                   Commissioner, I'm going to -- I don't think I'll  
8 have any difficulty finishing within time. I'd just like to  
9 advise City of Ottawa has offered their time to me in the event  
10 I get close.

11                   Mr. Wilson, I just have a few questions for you  
12 on your testimony from this morning.

13                   First is with respect to your flight to Ottawa,  
14 how you got here.

15                   **MR. KEITH WILSON:** M'hm.

16                   **MR. PAUL CHAMP:** There's a news report that that  
17 was on a charter flight operated by Northern Air Charter; is  
18 that correct?

19                   **MR. KEITH WILSON:** I believe so. I think that's  
20 the name of the company.

21                   **MR. PAUL CHAMP:** And apparently that company is  
22 now under investigation by Transport Canada for carrying  
23 unvaccinated people on that flight. Are you aware of that?

24                   **MR. KEITH WILSON:** That was the allegation by  
25 CTV, and my understanding is an investigation was commenced but  
26 no action was taken.

27                   **MR. PAUL CHAMP:** Okay. And who originally  
28 offered to pay for the flight? Was that Mr. Bourgault?

1                   **MR. KEITH WILSON:** I'm not, as I testified  
2 earlier, entirely clear on who was offering. I don't remember  
3 it to be Bourgault. It might have been Take Back our Freedoms.  
4 I believe there was a couple of people, and as I explained, we  
5 had this pattern where people would come forward and say, "Oh,  
6 we'll look after this, we'll look after that," and it didn't  
7 happen.

8                   There was some uncertainty as to whether or not  
9 we were even going to be allowed to get on the plane. But the  
10 Justice Centre said, "This is too important. Get on the plane.  
11 We'll sort this out later."

12                   **MR. PAUL CHAMP:** Okay.

13                   Now, before you got on the plane, I understand  
14 from the interview summary of Mr. Eros that there was a virtual  
15 meeting or Zoom meeting on or about January 31st where there was  
16 yourself, Andre Memauri, Brian Peckford, Tamara Lich, himself,  
17 and Joseph Bourgault. Do you recall that?

18                   **MR. KEITH WILSON:** It was on the evening of the  
19 1st. It was -- the reception they had in the hotel was  
20 terrible, terrible. They only heard probably a third of what we  
21 talked about. Mr. Bourgault was not on that. There was a  
22 doctor with a British accent, a very nice man. I can't remember  
23 his name. And Mr. Peckford was most definitely not on that  
24 call.

25 hours is probably some other conversation that we had. Do you  
26 see that?

27                   **MR. PAUL CHAMP:** Was not?

28                   **MR. KEITH WILSON:** Was not.

1                   **MR. PAUL CHAMP:** Was there another virtual call  
2 with Mr. Bourgault and yourself and Mr. Eros?

3                   **MR. KEITH WILSON:** I have never had a virtual  
4 call at any time in my life involving Mr. Eros and Mr. Bourgault  
5 ever.

6                   **MR. PAUL CHAMP:** Okay. When you arrived in  
7 Ottawa you testified that it was apparent to you that Ms. Lich  
8 really was the leader of this movement. You said that it seemed  
9 that people listened to her. She seemed to command a lot of  
10 respect, and so forth. That's right?

11                   **MR. KEITH WILSON:** Yeah. And even if you walked  
12 the streets when we were moving from one location to another, it  
13 was remarkable, the people that would come up and stop her and  
14 politely ask if they could have a hug. And the tears would just  
15 start to flow and often I was standing behind her and I would  
16 hear what these incredibly tragic stories that these people  
17 would share, and the grown men, and about how they had lost  
18 children to suicide. They'd lost their businesses, they'd lost  
19 their marriage. And it was Tamara and seeing what Tamara was  
20 doing that had given them hope. Hope.

21                   **MR. PAUL CHAMP:** I guess, was it also in part  
22 because people new that she had control over the \$10 million  
23 from GoFundMe? That's why she was the leader?

24                   **MR. KEITH WILSON:** Tamara figured out something  
25 the day before I did. And I remember we got -- it was my fault.  
26 I thought someone was coming up to hug her. We were leaving the  
27 Westin Hotel after coming out of the meeting with Dean French on  
28 the Friday night when he had presented the Mayor's proposal. I

1 thought it was someone wanting a hug. And it turned out it was  
2 a TV crew from Berlin TV, from Germany.

3 And I felt bad because we tried to protect Tamara  
4 from that. But when they asked her about the 10 million, she  
5 responded by saying, "The money is symbolism. The money is  
6 symbolism."

7 It was -- and if you look at how much money  
8 actually got to the truckers and how much was actually returned  
9 to the donors, the vast majority ended up back at the donors and  
10 as you know very well, otherwise it's in the escrow fund under  
11 court supervision partly over which you must receive notice  
12 before anything can happen to it.

13 So the money was symbolism in Tamara's view and I  
14 think she's right. It was a way for Canadians to demonstrate  
15 and add their voice to what they thought the convoy stood for  
16 which was holding the government to account and advocating for  
17 respect for our Charter, return to the rule of law.

18 **MR. PAUL CHAMP:** I wasn't going to ask a question  
19 on this but I couldn't help when I heard your testimony about  
20 the horn injunction. You testified that you advised your  
21 clients that the horns were a problem and that you expected that  
22 the injunction would be granted. And you were asked a couple of  
23 times by Commission counsel about whether your clients opposed  
24 the injunction.

25 Just to be clear, your clients opposed that  
26 injunction, correct?

27 **MR. KEITH WILSON:** Thank you. I honestly can  
28 tell you, Mr. Champ, and as you know, one of the things that

1 happens to me when I come to Ottawa, I meet you. And I mean  
2 that in respectful way. You've been very professional in your  
3 dealings and I thank you.

4 I actually -- as I was asked that question I  
5 couldn't remember whether I actively opposed. So if that's your  
6 memory, I agree that I probably did do, as lawyers do, oppose.  
7 But I do -- what I remember more clearly is advising my clients  
8 that there was no way that the court was not going to grant that  
9 injunction.

10 **MR. PAUL CHAMP:** You had argued that the horns  
11 were not irreparable harm and Ms. Lee should wear earplugs. Do  
12 you remember -- to sleep. Do you remember those arguments?

13 **MR. KEITH WILSON:** I don't but I have confidence  
14 in you; if that's your memory, then I'll accept that.

15 **MR. PAUL CHAMP:** I won't go further down the road  
16 of the different arguments that were made.

17 But then on the continuation of the injunction a  
18 week later, I remember that that became a bargaining point with  
19 the City? You were offering to the City that perhaps your  
20 clients wouldn't oppose the continuation of Ms. Lee's horn  
21 injunction if they did certain things; is that right?

22 **MR. KEITH WILSON:** That's correct. And my  
23 memory, I'm hoping, is correct that you recall we did not oppose  
24 that?

25 **MR. PAUL CHAMP:** Yeah, that's correct. You did  
26 not oppose the second one.

27 I want to ask you some questions about dealings  
28 with the police. Now, you've testified that you were hearing at

1 times that there were police raids imminent at different times  
2 during the protest and we did hear some evidence from the police  
3 tht there were raids planned at times but that then were  
4 aborted. So it sounds like you might have had some solid  
5 intelligence on that; is that fair?

6 **MR. KEITH WILSON:** Well, actually we thought we  
7 did. But after having observed the proceedings since the last  
8 few weeks, we had no idea of the level of dysfunction of in--  
9 fighting that was going on. We assumed that when information  
10 filtered in to the Operations Centre, that a raid was going to  
11 occur at nine o'clock that night at this location, that it was  
12 real. And then when it didn't happen, the assumption was it was  
13 a test, not that there was something happening where different  
14 inspectors and forces were in conflict about a plan.

15 We did not -- that was all new revelations  
16 through this Inquiry.

17 **MR. PAUL CHAMP:** Yeah, those new revelations, I  
18 think, that's one issue your clients and my clients can agree on  
19 for sure.

20 Now, but you were getting information from  
21 sympathetic police; is that right?

22 **MR. KEITH WILSON:** That is correct.

23 **MR. PAUL CHAMP:** Throughout?

24 **MR. KEITH WILSON:** Yes. There was -- the  
25 remarkable thing was that all these different individuals who  
26 had experienced -- you know, I was never prior to this a big  
27 believer -- a huge -- I didn't think they were a bad idea --  
28 about mission statements. It was remarkable how efficient

1 everybody worked because they all had the same mission statement  
2 that they had formulated deep to the core of their being. It  
3 was that they felt the country was badly off track, that their  
4 families and their communities were being harmed. And this was  
5 their opportunity to try and make a difference.

6                   So we had former police officers, military, Navy,  
7 CSIS, airline pilots, doctors, nurses, teachers, carpenters,  
8 chiropractors. The whole breadth of society was there and the  
9 cream just rose and they organically came together during the  
10 time, and those who were getting things done -- there was very  
11 little in-fighting. There was a lot of people coming in that we  
12 were trying to manage but it was really remarkable, the organic  
13 way in which the enterprise ran.

14                   **MR. PAUL CHAMP:** So that if people could cook,  
15 they were cooking? If they were IT people they were helping you  
16 with that? If they were communications people ---

17                   **MR. KEITH WILSON:** Yes. Well, then I ---

18                   **MR. PAUL CHAMP:** --- they were helping you with  
19 that.

20                   **MR. KEITH WILSON:** --- still remember ---

21                   **MR. PAUL CHAMP:** There was ---

22                   **MR. KEITH WILSON:** --- one really illustrative  
23 example was in the operations centre mid-morning, super cold  
24 outside, you know. Some people are -- a big huge square table,  
25 people working, people standing in groups, people looking at  
26 things on the board. And then someone came in and said, "Some  
27 situation is occurring at Albert and Kent" or wherever it was  
28 and everybody stopped for a minute. No one said what needed to

1 be done. Two people got up, threw their coats on, grabbed their  
2 toques, and they were gone. And then everybody carried on.

3 It was so efficient that there was no point even  
4 discussing what needed to be done and who was going to be doing  
5 it. Once the information came in then the people who knew they  
6 were best suited were dealing with it, did. It was spectacular  
7 to watch. That's why I now believe mission statement are very  
8 important.

9 **MR. PAUL CHAMP:** Now, on some of the things that  
10 people were doing cooperatively with the convoy, we heard from  
11 both Ms. Belton and Mr. Barber about the distribution of cash to  
12 truckers. You were -- you know that that was going on, right?

13 **MR. KEITH WILSON:** I observed it, yes.

14 **MR. PAUL CHAMP:** You observed it? And they were  
15 trying to keep track of how much cash was being put in each  
16 envelope before it was being distributed?

17 **MR. KEITH WILSON:** Yeah, that was really Chad  
18 Eros's department and he has given interviews that are online  
19 where he describes -- Chris Carson's interview where he  
20 describes the processes that he put in place. But I did observe  
21 cash being counted. My understanding was it was coming from the  
22 stage and from other places and being put into envelopes and  
23 then teams would go out and distribute it to the truckers.

24 **MR. PAUL CHAMP:** But Mr. Eros, he was one of the  
25 directors of Freedom Corp, correct?

26 **MR. KEITH WILSON:** He was not only a director; he  
27 was the treasurer and he was a paid accountant.

28 **MR. PAUL CHAMP:** Right. So he was gathering or



1 trying to keep track of that money on behalf of Freedom Corp,  
2 right?

3 **MR. KEITH WILSON:** I would hope so.

4 **MR. PAUL CHAMP:** Right. And so as an advisor to  
5 Freedom Corp at that time, you were aware that they were  
6 managing this distribution of funds and cash out to the  
7 truckers?

8 **MR. KEITH WILSON:** He was, yes.

9 **MR. PAUL CHAMP:** Okay. And he had estimated that  
10 it seemed that around \$20,000 per day was being raised through  
11 cash and e-transfers. Do you have any reason to dispute that?

12 **MR. KEITH WILSON:** I think the first time I saw  
13 cash would have been probably around -- I'm just trying to  
14 visualize the calendar here. Probably around the 11<sup>th</sup> or -- 11<sup>th</sup>  
15 maybe? Yeah. And that weekend, the 12<sup>th</sup>, and be -- that was  
16 after the provincial government in Ontario, the Attorney  
17 General, issued the seizure order that you're familiar with,  
18 with respect to GiveSendGo funds. And much like what you saw  
19 happen with -- when the police said, "No more fuel" to "If you  
20 bring fuel to downtown, you're going to be charged with  
21 counselling mischief" or something, the next day Ottawa  
22 residents and other one -- everyone showed up with gas cans; it  
23 was a "I am Spartacus" moment.

24 And what I observed was people were so determined  
25 to support the truckers that, because the GoFundMe got shut  
26 down, and now the GiveSendGo was being frozen, they weren't  
27 going to let that discourage them. I heard anecdotal stories  
28 from many truckers, where they would get the tap on the door and

1 someone would be there with their family and give them \$20, or  
2 \$100, or \$1,000, or \$5,000.

3 **MR. PAUL CHAMP:** So in your statement you say  
4 that some people were at the protest for money. Is -- getting  
5 all of this cash, do you think that was an incentive for the  
6 truckers to stay?

7 **MR. KEITH WILSON:** Not the vast majority because  
8 I just -- that wasn't why they were there. There was always --  
9 there's always opportunistic people that are more focused on  
10 money than others of us. That all I meant.

11 **MR. PAUL CHAMP:** And those trucks -- 300 to 400  
12 semi tractor-trailers operating 24 hours, or idling 24 hours a  
13 day required of diesel fuel; correct?

14 **MR. KEITH WILSON:** Not as much as if they're  
15 pulling a load.

16 **MR. PAUL CHAMP:** For sure. But who was paying  
17 for all of that fuel; the big trucks, that fuel at Coventry?

18 **MR. KEITH WILSON:** I know there's -- we put in to  
19 -- well, in your action with the *Mareva* injunction, there's  
20 details on that in the affidavits. But I also know that I was  
21 told by a businessman who wanted to donate fuel that he had  
22 contact -- or had his office contact three different fuel  
23 suppliers in the bulk of suppliers, and he wanted them -- he  
24 wanted to pay for a shipment of fuel from each of them. They  
25 declined because they said the best they could do was put him on  
26 a waiting list. They had so many people phoning from across the  
27 country to pay for fuel to be delivered downtown that they  
28 actually didn't want his money and they said all they could do

1 is put him on a waiting list.

2                   **MR. PAUL CHAMP:** So just a couple of last points,  
3 Mr. Wilson, just about some of the people who you're involved  
4 with.

5                   Pat King, you testified that you knew him from  
6 about a year before the convoy protest, is that right?

7                   **MR. KEITH WILSON:** Yeah, like I wasn't at his  
8 house or anything.

9                   **MR. PAUL CHAMP:** No.

10                  **MR. KEITH WILSON:** Yeah. He had gone on this  
11 highly misinformed rant on social media, and he was attacking a  
12 reporter and so I -- it's always dangerous on Twitter, I jumped  
13 in and explained the law and showed the pleadings so -- to show  
14 where he was misunderstanding how the law worked, and he hadn't  
15 set this big precedent. So I had -- but he's a loud voice, like  
16 Chris Sky.

17                  **MR. PAUL CHAMP:** Right.

18                  **MR. KEITH WILSON:** So I was aware of it.

19                  **MR. PAUL CHAMP:** But Mr. Sky's from Ontario,  
20 generally speaking, but Mr. King is from Alberta like yourself;  
21 correct?

22                  **MR. KEITH WILSON:** Yeah, Mr. Sky made his way  
23 across the country a few times.

24                  **MR. PAUL CHAMP:** Yeah, I'm aware of that. But  
25 Mr. King, he is in Alberta, so you did have some interactions  
26 with him?

27                  **MR. KEITH WILSON:** You know, there's four million  
28 people in Alberta, right?

1                   **MR. PAUL CHAMP:** Yeah, but I assume you don't  
2 have interactions with all of them. I'm asking about Mr. King,  
3 not all four million ---

4                   **MR. KEITH WILSON:** I -- the first time I was in  
5 physical presence of Mr. King was when he showed up in a  
6 boardroom in Ottawa during the protest, and it was about two or  
7 three days in and I immediately instructed him to be -- to leave  
8 the room; not him, I told the people around he's got to go. The  
9 only other direct interaction I had with him was on Twitter in  
10 the previous -- about 18 months prior to that where he was  
11 misunderstanding a ruling by a court judge.

12                   **MR. PAUL CHAMP:** But Mr. King -- my  
13 understanding, he was a supporter of Western separatism, and so  
14 forth, Wexit, and those kinds of movements; were you aware of  
15 that?

16                   **MR. KEITH WILSON:** I wasn't aware of that.  
17 It wouldn't surprise me, but I wasn't aware of  
18 that.

19                   **MR. PAUL CHAMP:** Were you involved in those  
20 movements; Western separatism, Wexit?

21                   **MR. KEITH WILSON:** I was never -- I've never  
22 formally been involved in those movements. I have been very  
23 concerned about the merits and the fairness of our  
24 Confederation. But seeing, as you're heard, and I saw it  
25 myself, a Quebecer with a Quebec flag running towards an  
26 Albertan with a cowboy hat and an Alberta flag, and embracing;  
27 seeing a Quebecer trucker, who could not speak any English, with  
28 a Cana -- a trucker from elsewhere in Canada, I don't know where

1 he was from, who couldn't speak any French, and they were using  
2 Google Translate in a Tim Horton's to communicate, and they were  
3 laughing and getting along, it restored my faith in the future  
4 of our country.

5 **MR. PAUL CHAMP:** So, just the last person I want  
6 to ask you about, while you're talking about French, Mr. Dean  
7 French.

8 Mr. French called you a patriot, is that right?

9 **MR. KEITH WILSON:** I believe that's in the text  
10 message, yes.

11 **MR. PAUL CHAMP:** Yeah, he supported the movement  
12 wholeheartedly, did he not?

13 **MR. KEITH WILSON:** It's clear I -- you'd have to  
14 ask him, but it was clear to me that he -- that he also had  
15 concerns about government overreach, and that the truckers were  
16 protesting that.

17 **MR. PAUL CHAMP:** And I thought I understood from  
18 your text that Mr. French, he's the one that arranged that  
19 interview with you and Fox News, is that right?

20 **MR. KEITH WILSON:** He did, but I also received  
21 phone calls from Fox News, I received emails from Fox News; they  
22 were all about the same time. I mean, that's how these guys  
23 work; ---

24 **MR. PAUL CHAMP:** Sure.

25 **MR. KEITH WILSON:** --- when they really want to  
26 get somebody, they reach out to everybody they can. I don't  
27 know that it was because of Dean that I got it; it might have  
28 been. But I had emails and phone calls from Fox News,

1 independent of those, just like I had contacted -- or had been  
2 contacted by the *New York Times* and the *Washington Post*, and  
3 everybody else.

4 **MR. PAUL CHAMP:** But he was assisting you?

5 **MR. KEITH WILSON:** He was -- he -- I wouldn't say  
6 he was assisting me. It was something he did on his initiative;  
7 I think he thought I would be a good interview.

8 **MR. PAUL CHAMP:** I was surprised to see you on  
9 legacy media like Fox News, by the way.

10 **MR. KEITH WILSON:** Well, you know, I guess we all  
11 get surprises.

12 **MR. PAUL CHAMP:** This last piece, did Mr. French  
13 ever indicate to you whether he had had any communications with  
14 Premier Ford, about his views about the protest?

15 **MR. KEITH WILSON:** He never did, but my clear  
16 sense was -- I'm not very familiar with the goings on in Ontario  
17 politics, but I had a general sense -- I think I might have  
18 Googled him, and I think I got a sense there was some  
19 estrangement or some falling out between him and the Premier,  
20 but I ---

21 **MR. PAUL CHAMP:** I just wondered if he ever  
22 communicated anything like that to you.

23 **MR. KEITH WILSON:** No, he never brought up -- the  
24 only time he would have made a reference to the Premier was --  
25 oh, like the whole Twitter account thing, because we had the  
26 problem with BJ Dichter logging in to Tamara's Twitter account  
27 and sending out that one Tweet, and he said, "Multiple people  
28 have access to this, right?" And I said, "Yeah," and he

1 explained to me that when he was Chief of Staff to the Premier,  
2 they had a rule; three people had access to the Premier's  
3 Twitter account, but two of them had to agree to a Tweet; no one  
4 person. And I said, "Yeah, it would've been nice to have known  
5 that."

6 **MR. PAUL CHAMP:** Just on that, though, that Ms.  
7 Lich also put out a livestream on Facebook, saying she wasn't  
8 supporting the deal that night.

9 **MR. KEITH WILSON:** That's not true.

10 **MR. PAUL CHAMP:** That's not true? Okay.

11 **MR. KEITH WILSON:** Thank you.

12 **MR. PAUL CHAMP:** Thank you.

13 Thank you, Commissioner.

14 **COMMISSIONER ROULEAU:** Okay. Thank you.

15 And next is the City of Ottawa. Am I to take it  
16 your -- you've no questions?

17 **MS. ANNE TARDIF:** That is correct, Mr.  
18 Commissioner.

19 **COMMISSIONER ROULEAU:** Thank you.

20 Next is the Ottawa Police Service.

21 **--- CROSS-EXAMINATION BY MS. JESSICA BARROW:**

22 **MS. JESSICA BARROW:** Good afternoon, Mr. Wilson.  
23 My name is Jessica Barrow, and I'm counsel for the Ottawa Police  
24 Service. I just have a couple of points I want to walk through  
25 with you.

26 So, first of all, I want to make sure that the  
27 record is very clear about who you do represent and who you do  
28 not represent.

1           So as the representative for Freedom Corp., you  
2 represent only those organizers that I believe you listed  
3 earlier in relation to Freedom Corp., and not other participants  
4 in the convoy; correct?

5           **MR. KEITH WILSON:** That's correct.

6           **MS. JESSICA BARROW:** And so, specifically, you do  
7 not represent Pat King or James Bauder?

8           **MR. KEITH WILSON:** That's correct.

9           **MS. JESSICA BARROW:** And you would agree with me  
10 that both Pat King and James Bauder were espousing views that  
11 your clients disagreed with; is that fair?

12          **MR. KEITH WILSON:** At times, yes.

13          **MS. JESSICA BARROW:** Okay.

14          **MR. KEITH WILSON:** Not universally, but some of  
15 their messages they did not agree with.

16          **MS. JESSICA BARROW:** And we saw specific evidence  
17 of them kind of rejecting the views of Pat King and James  
18 Bauder; is that fair?

19          **MR. KEITH WILSON:** Yeah, James Bauder -- there  
20 was a number of times where they were preparing a press release  
21 to distance from the MoU, or they were going to add it to a  
22 paragraph of a letter. But if you've ever drafted by committee,  
23 you know that everybody wants their piece, and certain things  
24 get left out. But I think they made it pretty clear that they  
25 did not support the MoU, and nor did they support, and they were  
26 very concerned about, any inuendo of violence from Mr. King.

27          **MS. JESSICA BARROW:** Right.

28           So speaking of violence, you indicated that at



1 the time you sort of advertised on TikTok that people should  
2 come to this city. It was your view that -- that that was  
3 because it was a lawful and peaceful protest in Ottawa; is that  
4 fair?

5 **MR. KEITH WILSON:** Yeah, and it was more than  
6 that because one of the things that I -- I mean, I'm a lawyer  
7 but I'm also a dad, and my wife and I have four kids, and it was  
8 remarkable to me, meeting many of the families with younger  
9 children -- I mean five, six up to 12, 14 -- and the amazement  
10 on their face. They're interacting with all these different  
11 truckers of every ethnic background and other Canadians and the  
12 excitement and the pride was really historic and I commended  
13 those parents for having their children learn from this and  
14 participate and experience it firsthand. It was very safe. I  
15 never imagined that the police would use the level of violence  
16 that they did.

17 **MS. JESSICA BARROW:** So you were aware, however,  
18 that -- and there were multiple warning to that effect -- that  
19 arrests were going to be taking place very shortly; correct?

20 **MR. KEITH WILSON:** The warnings really  
21 accelerated on the Thursday. And when I did the -- when Mr.  
22 Barber asked me to do his TikTok, that was on the Wednesday.

23 **MS. JESSICA BARROW:** And so when you're speaking  
24 of peacefulness and lawfulness, I take it you're not referring  
25 to those individuals that were charged with criminal offences  
26 prior to that date in relation to violence, or threats, or  
27 weapons?

28 **MR. KEITH WILSON:** I'm not following your

1 question. What do you mean?

2 **MS. JESSICA BARROW:** So I believe you've seen the  
3 institutional report from the Ottawa Police Service. It's been  
4 part of -- made part of the evidence.

5 **MR. KEITH WILSON:** Yeah, I've only had a chance  
6 to skim through parts of it.

7 **MS. JESSICA BARROW:** And would you disagree with  
8 me that multiple charges were laid prior to that TikTok video in  
9 relation to criminal offences that related to violence of  
10 threatening behaviour or weapons?

11 **MR. KEITH WILSON:** I do know that the statistics  
12 were clear that the crime rate had gone down. I do know that  
13 the -- because of some of the former police, paramedics,  
14 emergency services people that were in the operations centre  
15 explained to me what happens in Ottawa after, I think it's  
16 called, Bluesfest and the amount of assaults and violence that -  
17 - and even on Canada Days, the amount of assaults and violence  
18 they said -- they told me, having attended and participated and  
19 be on duty on those events, they had never seen this number of  
20 people come into the downtown core and with this level of safety  
21 and absence of violence, so that's what I knew.

22 **MS. JESSICA BARROW:** Okay, but my specific  
23 question was, when you're referring to a "peaceful protest", I  
24 take it you're not referring to the people who were engaged in  
25 criminal behaviour that was obviously deemed not to be peaceful?

26 **MR. KEITH WILSON:** Well, I mean it's a peaceful  
27 protest. Were there some people within a large crowd of five,  
28 or eight, or 10,000 people, as there were on the weekends, that

1 engaged in criminality? That's called normal.

2 **MS. JESSICA BARROW:** I'm going to move onto the  
3 deal with city officials. We've heard quite a bit of testimony  
4 about that and I think it's clear that your understanding of the  
5 deal always was that some trucks would move onto Wellington --  
6 and I think your evidence was around 25 percent -- and then the  
7 rest would leave the city core; is that correct?

8 **MR. KEITH WILSON:** Absolutely.

9 **MS. JESSICA BARROW:** Right. I want to bring you  
10 to HRF00000513 at page 52. And just for your reference, these  
11 are the text message between you and Mr. French.

12 **MR. KEITH WILSON:** Okay.

13 **MS. JESSICA BARROW:** And actually, could we go to  
14 page 59? I apologize, Mr. Clerk.

15 And so we just heard very briefly from you in  
16 relation to the Tweet that went out -- I think if you scroll  
17 down a little bit -- and that's the Tweet that's being  
18 referenced, right? This is an article about the Tweet where it  
19 comes from Tamara's account that it's a denial of the deal; is  
20 that correct?

21 **MR. KEITH WILSON:** Yes.

22 **MS. JESSICA BARROW:** And so regardless of who  
23 ultimately authored the Tweet, it was coming from Ms. Lich's  
24 Twitter account; correct?

25 **MR. KEITH WILSON:** Mr. Dichter has confirmed that  
26 he was the one who did it.

27 **MS. JESSICA BARROW:** But it -- in terms of how  
28 the public received it ---

1                   **MR. KEITH WILSON:** M'hm.

2                   **MS. JESSICA BARROW:** --- it came from Ms. Lich's  
3 account, right?

4                   **MR. KEITH WILSON:** Yes. And once we found out,  
5 Ms. Chipiuk and I got to the bottom of it in that Mr. Dichter  
6 acknowledged that he had done his own Tweet, and then he logged  
7 out and logged back in as her and then retweeted with a quote  
8 that said it was him. We said, "You've got to fix this and you  
9 have to fix it fast," because I have an email from him where he  
10 agreed to -- confirmed his consent, "Good to go," so he was the  
11 one -- we were trying to think of wording that could go out to  
12 confirm the deal was still going ahead and he decided that he  
13 would play the Tweet as though the reporter had made a mistake  
14 and I think he said something like, "Nice try, so and so. We  
15 were talking about the federal mandates. The deal to move  
16 trucks tomorrow is going ahead."

17                   **MS. JESSICA BARROW:** Can we just scroll down a  
18 little bit please?

19                   **MR. KEITH WILSON:** Sure.

20                   **MS. JESSICA BARROW:** And if you keep going down -  
21 --

22                   **MR. KEITH WILSON:** I think you just passed it.

23                   **MS. JESSICA BARROW:** No, I want to -- I think if  
24 we keep going down -- sorry, right there, yeah. So this is Dean  
25 French saying:

26    "It was posted two hours ago and no  
27    correction yet."

28                   So it does take some time, right, for the Tweet

1 to get corrected? I recognize there may have been some inner  
2 workings going on but it takes at least a few hours for that get  
3 correct; is that fair?

4 **MR. KEITH WILSON:** Yes.

5 **MS. JESSICA BARROW:** Okay. Can you ---

6 **MR. KEITH WILSON:** I can't dispute that. I can't  
7 remember -- I know that we were able to correct it around -- it  
8 was either 10:58 p.m. or 11:02 p.m. Dean had strongly  
9 recommended that we correct it, get to the bottom of it, figure  
10 out what happened, correct it in advance of the 11 o'clock news  
11 hour shows and I moved as quickly as I could to get to the  
12 bottom of it because I was completely blindsided by it.

13 **MS. JESSICA BARROW:** And there is -- I won't take  
14 you through the whole exchange just to save time but there is an  
15 acknowledgement from Mr. French where he's saying, "It would  
16 have been nice had it occurred prior to the 11 o'clock news."  
17 So would agree that it didn't get corrected prior to the 11  
18 o'clock news; is that correct?

19 **MR. KEITH WILSON:** There was many times where Mr.  
20 French and Mr. Peckford said, "Oh, it would be nice if you could  
21 do this," and I was like, "I don't think you are appreciating  
22 the dynamics of this environment." It was extremely chaotic.

23 **MS. JESSICA BARROW:** Would it be fair to say that  
24 through this text exchange -- and I can walk you through it if  
25 need be but to save time -- that Mr. French was expressing  
26 concerns about the impact this Tweet would have on the  
27 legitimacy of the deal, publicly?

28 **MR. KEITH WILSON:** As was I. I was ---

1                   **MS. JESSICA BARROW:** Yeah, you shared those  
2 concerns?

3                   **MR. KEITH WILSON:** Yeah, I was -- I received  
4 feedback from a lot of the people I was around that they were --  
5 they were struck how calm I was most of the time. There was one  
6 notable exception where I was arms flailing, yelling, likely  
7 swearing, and a very loud voice when I was like, "Who did this  
8 and what just happened here?" I was very -- because I and other  
9 had worked very, very hard to get us to this point. We had the  
10 logistics meeting at City Hall with Ayotte and the City manager,  
11 and Drummond. We had report -- heard back that the trucks were  
12 ready to roll and some of the guys were packing up some of their  
13 gear. And I was like, "Oh, my goodness, we've come this far and  
14 we're going to get sabotaged?"

15                   **MS. JESSICA BARROW:** And you would agree that  
16 because of that miscommunication, it would have created a lack  
17 of clarity to those following that account about whether there  
18 was or there was not a deal; is that fair?

19                   **MR. KEITH WILSON:** There was that lack of clarity  
20 even prior to that because this is the Sunday night. So when  
21 the pamphlets were being circulated and people would get them,  
22 they'd go, "Oh, this is fake." Some people thought that it was  
23 actually counter-intelligence propaganda either by the  
24 government or by the police. That's why the plan that we  
25 developed had teams of recognized road captains and other  
26 truckers who were very much recognized from the journeys to  
27 Edmonton to go in teams to the various blocks to personally talk  
28 to as many truckers as possible so they knew it was real.

1                   **MS. JESSICA BARROW:** But not withstanding that  
2 plan that may have been engaged, we did here from Ms. Belton  
3 yesterday that she was of the view at that time that it was fake  
4 news. In fact, she put a video out on TikTok that said it was  
5 fake news; is that correct?

6                   **MR. KEITH WILSON:** I don't -- I can't recall. I  
7 think that was played yesterday, sorry, yes.

8                   **MS. JESSICA BARROW:** Right.

9                   **MR. KEITH WILSON:** Correct.

10                  **MS. JESSICA BARROW:** And so, even at that time,  
11 there was still a lack of clarity even amongst organizers as to  
12 whether there was or was not a deal?

13                  **MR. KEITH WILSON:** I would say -- I would say it  
14 differently. I would say that subsequent to leaving Ottawa,  
15 when they reflected, they're remembering events differently,  
16 because there are emails.

17                  **MS. JESSICA BARROW:** Sure, there may be emails  
18 but the TikTok video was put out to whomever Ms. Belton's  
19 following consisted of; correct?

20                  **MR. KEITH WILSON:** Fair enough.

21                  **MS. JESSICA BARROW:** Right. And so I just want  
22 to bring up -- you mentioned that the flyer that got circulated.  
23 Could we bring that up, please? That's HRF1259. If we could  
24 scroll down to the bottom of the notice here, we -- this is  
25 obviously the notice we saw earlier that got circulated;  
26 correct? Sorry, if we could go -- yes, right there is perfect.  
27 Is this the correct version?

28                  **MR. KEITH WILSON:** I believe so.

1           **MS. JESSICA BARROW:** And so we ---

2           **MR. KEITH WILSON:** Actually, if you scroll down a  
3 little bit, I can tell you if it is. Yes ---

4           **MS. JESSICA BARROW:** Okay.

5           **MR. KEITH WILSON:** --- it's the final version.

6           **MS. JESSICA BARROW:** And so we see here that it  
7 says -- sorry, that's perfect:

8                           "The truckers on the Freedom Convoy  
9                           2022 board plan to start repositioning  
10                          our trucks forward on Monday to  
11                          consolidate our protest to the streets  
12                          in front of Parliament. There is also  
13                          room for trucks to relocate to 88."

14           That's the site off -- out of the city; correct?

15           **MR. KEITH WILSON:** It was one of three sites that  
16 existed at the -- 88 is the exit 88, which I understand is near  
17 Embrun.

18           **MS. JESSICA BARROW:** Would you agree with me that  
19 nowhere in this letter does it say that 75 percent of the trucks  
20 are going to have to leave the city as part of this deal?

21           **MR. KEITH WILSON:** Obviously.

22           **MS. JESSICA BARROW:** Right. So there may have  
23 been a lack of clarity about that issue as well?

24           **MR. KEITH WILSON:** There was a lack of clarity  
25 about many things, but most of the truckers would have -- some  
26 of them wanted to go, some of them wanted to go -- well, just  
27 like look at Mr. Barber. First he had his truck downtown on  
28 Wellington, and on his own initiative, he moved it out to



1 Arnprior or Embrun, one of the two, on his own initiative. He  
2 didn't want his truck downtown. Others wanted to do the same  
3 thing. These trucks were covered in salt. It's not a good  
4 thing to do for a long time. There was -- they'd set up truck  
5 washes at these places. Mr. Barber wanted Big Red cleaned. So  
6 this was not to be a precise document to enumerate every nuance  
7 of what we felt was going on at the time.

8 **MS. JESSICA BARROW:** Fair enough. But you would  
9 agree, and we saw evidence of that in the video at Rideau and  
10 Sussex, you would agree that where there was a lack of clarity  
11 about what the police were up to, it created challenges for the  
12 police in managing the situation; is that a fair assessment?

13 **MR. KEITH WILSON:** It is, and that's the learning  
14 from the video, because I -- you saw me walking with the PLTs.  
15 We kept walking and I had a meeting with them, and Tamara was  
16 there as well. If you pause the video, you'll actually see us  
17 walk past Tamara and then she comes up and we talk. And we're,  
18 like, okay, what are our lessons learned here? How do we do  
19 this differently? And number one was don't do it at night.  
20 Don't do it at night. That's why we shut down the moves partly  
21 on the Monday because it was getting dark. That was a huge  
22 error. And Tom Marazzo had actually said earlier on, "We don't  
23 make any moves at night. It's just too dangerous." But it also  
24 changed the dynamic of the crowd.

25 But and that's why we needed this coordination  
26 with the police. We were very optimistic with the truckers, and  
27 a lot of them went out. It wasn't just Chris. There was  
28 several of them that were on their feet moving. If you look at

1 some of the videos, you'll see them running along the sidewalk.  
2 You'll see the police cars and then you'll see the trucks, then  
3 you'll see Chris running. And we were doing it.

4 **MS. JESSICA BARROW:** And the PLT were alongside  
5 doing that as well, correct, in terms of trying to get truckers  
6 to move in response to the deal?

7 **MR. KEITH WILSON:** They weren't trying to get  
8 truckers moved. They were trying to get the other people and  
9 the police to agree that the truckers could move. On the  
10 Tuesday morning, a delegation of PLTs arrived unexpectedly for  
11 the first time ever at the Swiss Hotel. I was in a room working  
12 on the letter with Tamara for the Prime Minister and the  
13 Premieres with the one that's been put in evidence. I got a  
14 knock on the door. The PLTs were there. I went in, and that's  
15 on the Tuesday they said -- they sensed something was wrong,  
16 and, like, the trucks are all wanting to move, but they said to  
17 me it was only a 24-hour deal. I said, "Look at the letter.  
18 With a large logistical exercise, the mayor's letter will take  
19 24 to 72 hours." He looked embarrassed. He went over into the  
20 corner by the bathroom. He got on the phone, turned around, his  
21 face was a little red, and he said to everybody, "Sorry, major  
22 miscommunication. We're going to go out and try and get the  
23 trucks moving."

24 So it was -- the PLTs were not trying to convince  
25 trucks to move. They were dealing with the police hierarchy and  
26 trying to get them, whoever kept blocking to stop the blocking.

27 **MS. JESSICA BARROW:** But I think after that  
28 miscommunication was clarified, PLT did work with protesters and

1 ultimately some trucks did move; correct?

2 **MR. KEITH WILSON:** Not on the Tuesday.

3 **MS. JESSICA BARROW:** No, I'm talking about in  
4 general in response to the City deal. Some trucks moved  
5 Tuesday; yes?

6 **MR. KEITH WILSON:** Oh, yeah.

7 **MS. JESSICA BARROW:** Yeah.

8 **MR. KEITH WILSON:** Over a hundred vehicles over  
9 two city blocks were cleared on Albert, a hundred vehicles left  
10 the downtown, including around 40 trucks, 23 of which -- I know  
11 it was 23 because I reported the 23 count from Chris. He phoned  
12 me, and he -- I said, "How many do you have on Wellington?" He  
13 said, "We moved 23 to Wellington. If you look at my text  
14 message, you'll see 23 onto Wellington." But it was 40 semis  
15 moved in total. The others left, and we know for sure one of  
16 them went straight home.

17 **COMMISSIONER ROULEAU:** Okay. You're well over  
18 your time.

19 **MS. JESSICA BARROW:** Could I just ask one more --

20 -

21 **COMMISSIONER ROULEAU:** You're going to have to --

22 -

23 **MS. JESSICA BARROW:** --- Mr. Commissioner?

24 **COMMISSIONER ROULEAU:** Yes.

25 **MS. JESSICA BARROW:** Thank you. You were here  
26 when Superintendent Drummond testified, and he testified that  
27 there were challenges with getting some of the truckers to move  
28 in response to that deal. Do you have any reason to disbelieve

1 that evidence from Superintendent Drummond?

2 **MR. KEITH WILSON:** No, we anticipated that there  
3 would be some holdouts, but we also knew that they wanted to be  
4 part of the group, and we anticipated that once the big -- most  
5 of them moved, the holdouts -- we didn't want to just be sitting  
6 there by themselves, and they would move.

7 **MS. JESSICA BARROW:** And you testified that you  
8 were taking that on faith; is that correct?

9 **MR. KEITH WILSON:** We -- that was our expectation  
10 and it bore out to be true on the Monday.

11 **MS. JESSICA BARROW:** Thank you. Those are my  
12 questions.

13 **MR. KEITH WILSON:** Thank you.

14 **MS. JESSICA BARROW:** And thank you for the  
15 indulgence.

16 **COMMISSIONER ROULEAU:** Okay. Counsel for former  
17 Chief Sloly.

18 **MR. TOM CURRY:** Thank you, Commissioner.

19 **--- CROSS-EXAMINATION BY MR. TOM CURRY:**

20 **MR. TOM CURRY:** Good afternoon, Mr. Wilson.

21 **MR. KEITH WILSON:** Good afternoon.

22 **MR. TOM CURRY:** For the record, Tom Curry for  
23 Chief Sloly. You were present uninterrupted here in Ottawa, if  
24 I have it, February 2 to the 21<sup>st</sup>?

25 **MR. KEITH WILSON:** Nineteen (19) days, yes.

26 **MR. TOM CURRY:** And you've described for the  
27 Commissioner your observations of the scene on the ground. Did  
28 you observe the enforcement action that was taken?

1           **MR. KEITH WILSON:** Yes. The vantage point we  
2 had, Ms. Chipiuk and I, we set up a little, you know, operation  
3 centre of our own because we also had to monitor the bail  
4 applications and coordinate with the criminal legal teams. And  
5 we could see -- we had the view of the backside of the Weston  
6 and that tunnel, so we saw all the police -- all the highway  
7 buses coming in with the police filing off, and then we also, of  
8 course, had the television on, so we were watching the live  
9 streams from CTV and CBC as we were looking out our window and  
10 actually watching. We were quite high up, like, the 17<sup>th</sup> floor.  
11 And then getting various reports. It was a very, very active  
12 environment.

13           **MR. TOM CURRY:** Had you given advice about the  
14 implications of the *Emergencies Act* -- the invocation of the  
15 *Emergencies Act* and what it meant for the protesters who were in  
16 the areas that had been uber affected by that?

17           **MR. KEITH WILSON:** I had given advice to the  
18 Board, as I've testified, on the Wednesday. I had done the Tik  
19 Tok that the Board and Mr. Barber requested on the Wednesday. I  
20 wasn't -- because Ms. Lich instructed myself and Ms. Chipiuk to  
21 go to an undisclosed location because she was concerned, she had  
22 no idea what was going to happen to us, we followed her  
23 instruction. And after that point, I lost any ability to do any  
24 large-scale communication that I can recall.

25           **MR. TOM CURRY:** Right. Understood. Did you see  
26 the flyers, the pamphlets, the information distributed by police  
27 to protesters?

28           **MR. KEITH WILSON:** Yes.

1           **MR. TOM CURRY:** Through the Police Liaison Teams?

2           **MR. KEITH WILSON:** To be precise, sir, when I say  
3 yes, there was -- they had a big blue outline and some of them  
4 had a red outline. They were placed on the windshields. And I  
5 saw that was the calm before the storm, so it was the Thursday.  
6 The Thursday there was a ceremony at the war memorial that I  
7 attended along with my wife, and I remember stopping and reading  
8 the warning that if you didn't leave -- and I'm going by memory  
9 -- that your -- you would be ticketed, your vehicle would be  
10 impounded. And I can't recall what else it said.

11           **MR. TOM CURRY:** Okay. Now you had -- you told us  
12 you had involvement with the PLT, Police Liaison Team members.  
13 Were they Ottawa Police Service and OPP?

14           **MR. KEITH WILSON:** That's correct.

15           **MR. TOM CURRY:** Okay. Any other police officials  
16 that you dealt with face-to-face or was it exclusively PLT?

17           **MR. KEITH WILSON:** I had interactions with --  
18 chance meetings with other -- some OPP and other police. They  
19 were extremely friendly, very cordial, very -- non-threatening.  
20 But in terms of any, you know, official, formal interactions, it  
21 was the PLTs.

22           **MR. TOM CURRY:** Okay. Thank you. And, of  
23 course, your role evolved as you tried to provide the convoy  
24 organizers with a legal strategy or input into their strategy  
25 from a legal perspective and advice to achieve their objectives;  
26 is that fair?

27           **MR. KEITH WILSON:** Yes.

28           **MR. TOM CURRY:** Your contact with protesters, I

1 think you told the Commissioner, just to clarify, these are  
2 independent operators; yes?

3 **MR. KEITH WILSON:** Yeah, reminded me of the  
4 ranchers in Alberta, yes.

5 **MR. TOM CURRY:** Indeed. You told us that they  
6 came here, and I'm not going to say every single one, but would  
7 it be right for the Commissioner to understand that those  
8 protesters who you encountered came here to Ottawa as part of  
9 the convoy intending to protest for the weekend but were inspired  
10 to stay as a consequence of their -- of the response that they  
11 observed from Canadians as they came here and once they arrived.

12 **MR. KEITH WILSON:** I think they were inspired and  
13 they felt charged with a new responsibility to ensure the  
14 protest was successful, a responsibility they didn't realize  
15 they would be invested in when they set out.

16 However, I do know, having reviewed the evidence  
17 that in every instance that I have seen Ms. Lich was clear that  
18 at no time did she say we're leaving after the weekend. I  
19 believe she said, "We're going to stay until the mandates are  
20 lifted."

21 **MR. TOM CURRY:** The independent operator  
22 protestors though, you agree with me that because they are -- if  
23 they're not on the road they're going backwards financially,  
24 right?

25 **MR. KEITH WILSON:** Correct.

26 **MR. TOM CURRY:** And so would it be right -- I  
27 understood your evidence to mean that the protesters, the  
28 independent operators, leaving aside the organizers and their

1 message -- that the protestors were invested in a shorter  
2 protest than they were inspired to commit to once they got here.  
3 Is that fair?

4 **MR. KEITH WILSON:** Do you mean the opposite of  
5 what you just said?

6 **MR. TOM CURRY:** The independent operators who  
7 came here weren't intending when they -- let me start over  
8 again.

9 The inspiration that you've spoken about -- that  
10 acted on them to stay here and protest longer than they would  
11 have originally.

12 **MR. KEITH WILSON:** Yeah, thank you. And I wasn't  
13 trying to be unfair to you.

14 I had a number of truckers say to me that they  
15 had originally planned -- as you've already heard from Mr.  
16 Barber, you know, to be in the convoy for a day, to join it for  
17 a certain distance and then turn around and reverse course home.  
18 And then they found themselves in Ottawa and found themselves in  
19 Ottawa for a long period. Yeah, that's part of that synergy of  
20 growth that occurred.

21 **MR. TOM CURRY:** And you told us that there were  
22 some challenging members even among the top group of the  
23 leadership group. You've called Mr. King, I think, in your  
24 statement a rabble rouser who was at least, if not encouraging  
25 violence, tolerant of violence.

26 **MR. KEITH WILSON:** Yeah, I mean, I think he was  
27 very angry and frustrated and really wanted to fight hard to get  
28 the government to change course. And not all of us used the



1 same approaches.

2 **MR. TOM CURRY:** Mr. Dichter was undermining the  
3 leadership?

4 **MR. KEITH WILSON:** I ---

5 **MR. TOM CURRY:** At least in part?

6 **MR. KEITH WILSON:** Yeah, I've just never been  
7 able to understand Mr. Dichter. And the other thing is that he  
8 wasn't there that much because firstly, he had left early before  
9 I arrived in late January. And then he'd had a car accident, I  
10 believe, near Kingston. And then he returned on the Friday the  
11 4<sup>th</sup> of February and then early that evening at approximately 6:00  
12 or 7:00 p.m. as he was leaving the front door of the ARC Hotel  
13 he fell and badly broke his ankle. So then he was away at  
14 hospital for a period of time.

15 Then he was restricted to his room because he  
16 just had a wheelchair and crutches. Then he had to go back for  
17 some surgery. So he was out of the loop a lot.

18 **MR. TOM CURRY:** Right. And then Mr. Wilson, you  
19 described the MOU was not helpful to the main strategy you were  
20 -- the organizers were pursuing, fair?

21 **MR. KEITH WILSON:** A distraction and false hope.

22 **MR. TOM CURRY:** Now, that meant all of it in the  
23 aggregate, in addition to the independent minds of the  
24 independent operators that controlling this entire group was  
25 very challenging.

26 **MR. KEITH WILSON:** It was impossible.

27 **MR. TOM CURRY:** And one of the things -- can I  
28 show you please, just to see if this quote is accurate, in HRF,

1 please, Mr. Registrar, 1379.

2 Just while that's coming up, Mr. Wilson, I think  
3 you gave an interview to Mr. Lawton who has published or was  
4 publishing a book about the events of the convoy. Do you recall  
5 that?

6 **MR. KEITH WILSON:** That's correct.

7 **MR. TOM CURRY:** Can I just ask you please to look  
8 at this and just maybe to the top just to orient the witness.

9 Just a little higher; there's an email, I think.  
10 There we go.

11 Do you recall seeing this?

12 **MR. KEITH WILSON:** Yes.

13 **MR. TOM CURRY:** Could you please go then to, I  
14 think it's page 5. There is a quote attributed to you. I just  
15 want to make sure that it's -- there it is.

16 And for context, Mr. Marazzo had also spoken  
17 about some of the events and the last line of that part -- see  
18 it at the top.

19 "No one could force the truckers to do  
20 anything they didn't want to do."

21 And you seemed to have agreed in that to say:

22 "We don't control them. We don't even  
23 know who they are. No one signed up.  
24 It's not a curling bonspiel. It's not  
25 a golf tournament."

26 And you made the comment that you can't simply  
27 tell them what to do. Fair comment?

28 **MR. KEITH WILSON:** Yeah. And that's why we had

1 to use other approaches of moral suasion, of leadership, of  
2 recognizing their fatigue, recognizing the desire of many to  
3 find a graceful and respectful way, a proud way to get back  
4 home.

5 **MR. TOM CURRY:** And the Ottawa Police Services  
6 interaction with them expected and reasonably expected that a  
7 peaceful protest, a lawful protest would be held in their  
8 community, fair?

9 **MR. KEITH WILSON:** I have to assume that to be  
10 true.

11 **MR. TOM CURRY:** And the unlawful -- you raised  
12 the issue with my friend, Mr. Leon, about the -- when did it  
13 become an unlawful protest. And you've answered this question  
14 to others so I won't dwell on it. But certainly you would  
15 accept that the blocking of municipal roads, the violation of  
16 noise by-laws and other forms of what might loosely be described  
17 as harassment as part of that demonstration, would be a  
18 challenge for police in confining the protest to a lawful  
19 protest; is that fair?

20 **MR. KEITH WILSON:** Well, if you and I -- and I  
21 mean you and I -- happen to be walking down Wellington on  
22 February 10<sup>th</sup> and we were having a chat, lawyer to lawyer, I  
23 don't think that we would conclude that you and I were breaking  
24 the law by walking down in front of Parliament, you know, on the  
25 sidewalk of Wellington Street.

26 So this was the challenge is that you had  
27 individuals who were -- who I had told consistently when they  
28 asked, you know, of course you can't park your truck there and I

1 always used the analogy to the 401 which they got. "Yeah, I  
2 wouldn't be allowed to do that. This is no different."

3 But for this potential, I really wouldn't get  
4 into it with most of them about it because they were told to  
5 park there and then they were barricaded in place. So it was  
6 this weird mix where you had people lawfully, in my view,  
7 walking, mingling, shopping, interacting, some showing signs,  
8 some not, some just wanting to take it in with other who were  
9 breaching various parking bylaws and municipal ordinances and  
10 provincial statutes.

11 **MR. TOM CURRY:** Right. And just a couple of  
12 quick things then Mr. Commissioner.

13 On top of that, you also faced the challenge of  
14 some -- I think in your statement you maybe described them as  
15 strange people who had descended into the protest, often in the  
16 evening, often on the weekends, some sovereign citizens, and  
17 others who were -- I think you may have labelled them  
18 troublemakers. That was a challenge for the convoy organizers  
19 to deal with, of course?

20 **MR. KEITH WILSON:** Constantly.

21 **MR. TOM CURRY:** And challenging obviously for  
22 police and residents?

23 **MR. KEITH WILSON:** Yes. And thee was a good  
24 cooperation there. You know, when -- that was the rule. So  
25 everybody had a block captain and if Antifa was going to show up  
26 the rule was you phone the police, you call 9-1-1. And the  
27 frustration for us was the next day, you know, three people from  
28 Antifa came in and vandalized trucks. The next day the police

1 chief or whichever one would hold a press conference and say,  
2 "Last night we had three charges for property damage in the  
3 downtown core."

4 And we were like ---

5 **MR. TOM CURRY:** You closely watched the signals  
6 coming from all levels of government including the Police  
7 Services Board here in Ottawa and the chief, Chief Sloly,  
8 correct?

9 **MR. KEITH WILSON:** Yeah. Our most acute concern  
10 was the level of pressure we saw building on Police Sloly from  
11 the Police Services Board. That's what motivated Mr. Marazzo to  
12 take a series of steps to cause the City meeting to facilitate  
13 some action to reduce pressure.

14 **MR. TOM CURRY:** Including through your efforts  
15 with Mr. French to avoid what I think in one of your text  
16 messages to him was a blood bath.

17 **MR. KEITH WILSON:** Yes. And the first one though  
18 was to -- it was two distinct strategies, One was immediate  
19 acute, which was the pressures saw on Sloly before he was no  
20 longer chief. And the other one was a broader exit plan.

21 **MR. TOM CURRY:** Right. Thank you, Mr. Wilson.

22 **MR. KEITH WILSON:** Thank you.

23 **COMMISSIONER ROULEAU:** Thank you. Next is the  
24 Ontario Provincial Police.

25 **MR. CHRISTOPHER DIANA:** Good afternoon,  
26 Commissioner. The OPP have no questions today.

27 **COMMISSIONER ROULEAU:** Thank you. The CCLA,  
28 please?

1                   **MS. EWA KRAJEWSKA:** Good afternoon, Commissioner.  
2 Ewa Krajewska, for the Canadian Civil Liberties Association.

3 **--- CROSS-EXAMINATION BY MS. EWA KRAJEWSKA:**

4                   **MS. EWA KRAJEWSKA:** Mr. Wilson, just briefly,  
5 were you still on the ground in Ottawa when the financial  
6 institution freezing order started to come into effect?

7                   **MR. KEITH WILSON:** Yes. Just to be clear, There  
8 was three instances related to freezing that I was dealing with  
9 -- well, four -- and no random order, just off the top of my  
10 head. The earliest one was the threat of an interpleader  
11 application by TD Bank through their external counsel. The next  
12 one was the *ex parte* order obtained by the Attorney General of  
13 Ontario under the Criminal Code declaring the donations proceeds  
14 of crime. Then the next was a freeze order of sorts, and then  
15 we had the emergency measures, the financial measures, and then  
16 after that, we had the Mareva injunction.

17                   **MS. EWA KRAJEWSKA:** Okay. I just want to ask you  
18 about the financial measures under the *Emergencies Act*.

19                   **MR. KEITH WILSON:** Yes.

20                   **MS. EWA KRAJEWSKA:** Can you just -- did people  
21 come to you from the Freedom Convoy and ask you for advice with  
22 respect to the orders and relate to you how they were affecting  
23 them, and can you just provide a -- if they did, could you just  
24 provide a summary of how the orders were affecting them, if they  
25 came to you to speak to you about that?

26                   **MR. KEITH WILSON:** Every one of them did in real  
27 time, and they were finding out at different times. I still  
28 remember one of them coming to me and saying, "I just got a

1 phone call from my wife. She's at the supermarket. She was  
2 with the kids, grocery cart was full, she wanted to pay with the  
3 debit card, it didn't work."

4           There's the line up of people. What's going on,  
5 because now the conveyor's full with the next person's  
6 groceries. And then she tried her Visa card and her second  
7 credit card, and none of it worked, and she had to leave the  
8 store in great embarrassment, and phoned her spouse and said,  
9 "What is going on?"

10           We had other people that were trying to put gas  
11 in their vehicles and couldn't. There was more than one  
12 incidence where people needed to get prescriptions filled, could  
13 not. And then subsequent to that, as we worked to get the  
14 freezes lifted and reach out to the bank, we developed this  
15 template email to write to the bank to ask the bank to respond  
16 to us as lawyers, Ms. Chipuik and I.

17           Then we have received reports since and it's  
18 recently that a number of these people, even though their bank  
19 accounts were unfrozen -- sorry, Mr. Commissioner, just realized  
20 how fast I was speaking -- after their accounts were frozen have  
21 been denied credit applications, and I have explained to my  
22 clients and others who contacted me that the Canadian Bankers'  
23 Association representative who testified before the House  
24 Committee said that each of these persons will have their  
25 accounts -- their names marked -- flagged for life.

26           **MS. EWA KRAJEWSKA:** Thank you, Mr. Wilson. Those  
27 are all my questions.

28           Thank you, Commissioner.

1                   **COMMISSIONER ROULEAU:** Thank you.

2                   Okay. Convoy Organizers, any questions?

3                   **MR. BRENDAN MILLER:** We have no questions, sir.

4                   **COMMISSIONER ROULEAU:** Thank you. Any re-  
5 examination?

6 **--- RE-EXAMINATION BY MR. JEFFREY LEON:**

7                   **MR. JEFFREY LEON:** Yes. Just two points.

8                   Mr. Wilson, in response to my friend Mr.  
9 MacKinnon's questions about whether you were referring in that  
10 email to the federal *Emergencies Act*, I believe you said that  
11 someone had heard from some MPs that it was under active  
12 discussion?

13                   **MR. KEITH WILSON:** Yes. We heard it a number of  
14 times over the course of the week prior.

15                   **MR. JEFFREY LEON:** Do you recall who was telling  
16 you that?

17                   **MR. KEITH WILSON:** No, it would have been someone  
18 coming into the operation centre that had heard from an MP. I  
19 remember hearing -- because I would say, "Well, what's the  
20 source?" and it was some MP, and I can't remember -- I don't  
21 believe it was indicated as to which party, whether it was the  
22 Liberal, New Democrat, or Conservative MP, but it was -- I guess  
23 there was strong rumours over in Parliament that it was active -  
24 - under active consideration.

25                   **MR. JEFFREY LEON:** And in response to my friend  
26 Mr. Champ's question to you about the injunction, I think you  
27 acknowledged that you did oppose the initial application?

28                   **MR. KEITH WILSON:** Yes.



1                   **MR. JEFFREY LEON:** Can you help me with this? I  
2 understood from your evidence that your clients had been  
3 concerned for some time about the horn blowing?

4                   **MR. KEITH WILSON:** Yes.

5                   **MR. JEFFREY LEON:** And I believe you said that  
6 they took their own action even before the injunction?

7                   **MR. KEITH WILSON:** The truckers had agreed  
8 amongst themselves -- and this is in the transcript and  
9 represented, I believe, in an affidavit actually -- before the  
10 Superior Court and the injunction application that they put in  
11 this informal protocol of being silent between 8:00 p.m. and  
12 8:00 a.m.

13                   Justice McLean, on the Saturday application, had  
14 suggested the parties consider agreeing to maybe allowing one  
15 hour for horns during the noon hour, but when we returned on the  
16 following Monday, that was something he wasn't interested in  
17 entertaining.

18                   **MR. JEFFREY LEON:** And so can you tell us, if  
19 there was this concern, why was it that you were opposing the  
20 injunction? Wouldn't it have been consistent with your clients'  
21 views to have an injunction and stop people blowing their horns?

22                   **MR. KEITH WILSON:** The Board was split. Other  
23 members and some of the truckers felt that it was something that  
24 shouldn't be -- that they shouldn't be restricted, other than  
25 the agreement they had for night quiet from being able to blow  
26 their horn. They thought it was part of their right of protest.  
27 So there wasn't unanimity in the client group on that point, and  
28 the instructions that I and Ms. Chipuik received were to oppose

1 it, now that Mr. Champ has refreshed my memory.

2 **MR. JEFFREY LEON:** Thank you.

3 **COMMISSIONER ROULEAU:** Okay. Well, that  
4 completes the cross-examinations.

5 I just have one question, and it's with respect  
6 to something I believe was heard earlier on.

7 Was there an area that was allowed for protests  
8 or encouraged by either the police or your group to carry out  
9 protests, other than on Wellington Street?

10 I heard something about near the War Museum. Are  
11 you aware of anything like that?

12 **MR. KEITH WILSON:** Yeah. No, there wasn't, and  
13 that was one of our frustrations, Mr. Commissioner, was that we  
14 were always faced with this zero-sum choice with police  
15 liaisons. We were trying to -- I really believe that if we  
16 could have a stepped type process, you know, a ramping down and  
17 building off success and building trust, but no, it was always  
18 the number of calls in a day, and if you look at my phone logs,  
19 you'll see the number of calls in a day I was receiving from the  
20 PLTs after I became more involved in that, and it was always the  
21 same question. "Keith, what's the exit strategy?"

22 You know, it was always, "When are everybody  
23 leaving?" sort of thing.

24 **COMMISSIONER ROULEAU:** Okay. So you're not aware  
25 of an area near the War Museum that was -- that protests were  
26 allowed and were carried out?

27 **MR. KEITH WILSON:** There was an area, I believe,  
28 along -- if my geography is correct, and it may not be -- along

1 the Sir John A, where they had set up, and you'll see this.  
2 There's photographs of it. And I don't know, but there was  
3 never any discussion or offer from the PLTs for anything other  
4 than ending the protest in its totality.

5 **COMMISSIONER ROULEAU:** Did you ever specifically  
6 ask the PLTs for an area or a manner to continue the protest?

7 **MR. KEITH WILSON:** No, I did not, other than  
8 taking the steps of this de-escalation and reducing the  
9 footprint to Wellington.

10 **COMMISSIONER ROULEAU:** So you didn't ask and they  
11 didn't offer?

12 **MR. KEITH WILSON:** Correct.

13 **COMMISSIONER ROULEAU:** Okay. Well, thank you  
14 very much for your evidence.

15 We're going to take the lunch break and come back  
16 in an hour with a new witness. Thank you.

17 **THE REGISTRAR:** The Commission is in recess for  
18 one hour. La Commission est levée pour une heure.

19 --- Upon recessing at 1:03 p.m.

20 --- Upon resuming at 2:06 p.m.

21 **THE REGISTRAR:** Order. A l'ordre.

22 The Commission has reconvened. La Commission  
23 reprend.

24 **COMMISSIONER ROULEAU:** Good afternoon. Bon  
25 après-midi.

26 **MR. JOHN MATHER:** The next witness is Tom  
27 Marazzo.

28 **--- MR. TOM MARAZZO, AFFIRMED:**

1 --- EXAMINATION IN-CHIEF BY MR. JOHN MATHER:

2 MR. JOHN MATHER: Good afternoon, Mr. Marazzo.

3 MR. TOM MARAZZO: Good afternoon.

4 MR. JOHN MATHER: My name is John Mather. I'm  
5 one of the Commission counsel.

6 Through your counsel you have provided a  
7 statement about your involvement in the protests in Ottawa; is  
8 that correct?

9 MR. TOM MARAZZO: Yes, sir.

10 MR. JOHN MATHER: If we could pull up HRF1595?  
11 Is this the statement that you've provided?

12 MR. TOM MARAZZO: Yes, it is.

13 MR. JOHN MATHER: Have you reviewed it before  
14 testifying?

15 MR. TOM MARAZZO: Yes, I did.

16 MR. JOHN MATHER: Are there any changes that you  
17 wish to make?

18 MR. TOM MARAZZO: No, sir.

19 MR. JOHN MATHER: Do you adopt the contents of  
20 this statement as accurate?

21 MR. TOM MARAZZO: Yes.

22 MR. JOHN MATHER: I'm going to ask you just a few  
23 questions about your background.

24 I understand from the statement which we can  
25 actually take down, Mr. Clerk -- is that you were born and  
26 raised in Ontario. Where did you grow up?

27 MR. TOM MARAZZO: Niagara Falls and St.  
28 Catherines, Ontario.

1                   **MR. JOHN MATHER:** And where do you live now?

2                   **MR. TOM MARAZZO:** Just outside of Napanee.

3                   **MR. JOHN MATHER:** And I understand that you're a  
4 father of two children; is that right?

5                   **MR. TOM MARAZZO:** Yes, sir.

6                   **MR. JOHN MATHER:** And you served in the Armed  
7 Forces for 25 years, achieving the rank of Captain; is that  
8 correct?

9                   **MR. TOM MARAZZO:** Yes.

10                  **MR. JOHN MATHER:** And then after leaving the  
11 Armed Forces you earned an MBA?

12                  **MR. TOM MARAZZO:** No, I had the MBA when I was  
13 currently serving. And then when I retired from the military in  
14 2015 I went back to school and did a Bachelor of Technology in  
15 software development.

16                  **MR. JOHN MATHER:** And where did you earn that  
17 Bachelor?

18                  **MR. TOM MARAZZO:** Seneca.

19                  **MR. JOHN MATHER:** Okay. And then after that you  
20 began working at Georgian College as a partial load teacher; is  
21 that right?

22                  **MR. TOM MARAZZO:** Yes.

23                  **MR. JOHN MATHER:** And as I understand it, you  
24 lost that job in 2021; is that correct?

25                  **MR. TOM MARAZZO:** Yes.

26                  **MR. JOHN MATHER:** Can you please explain to the  
27 Commission what happened?

28                  **MR. TOM MARAZZO:** I was notified that the College

1 had adopted the province-wide COVID 19 vaccine mandates and I  
2 had some interactions with my union and realized that the union  
3 was not going to be supportive. And so subsequent emails came  
4 out from the president of the college herself. And my response  
5 to that was to send an email to the president of the college as  
6 well as deans, the VP of HR, and as many other faculty as I  
7 could put on this email.

8 I sent it internally to the college, not  
9 publicly, looking to express my concern and question -- you  
10 know, I'm not a lawyer, obviously -- questioning the legality  
11 and sort of the morality of what they were doing.

12 And a few days later I was terminated with cause.

13 **MR. JOHN MATHER:** And when was that,  
14 approximately?

15 **MR. TOM MARAZZO:** September 13<sup>th</sup> of last year. So  
16 a year September.

17 **MR. JOHN MATHER:** And what were you doing between  
18 September 2021 and your arrival in Ottawa, which we'll get to in  
19 a minute, which I understand was in January 2022?

20 **MR. TOM MARAZZO:** Yeah. My former spouse and I  
21 sold our house and we purchased land outside of Napanee and then  
22 we moved to that area. And the plan really this year was to  
23 build a house. I cashed an RRSP to live off of while I was  
24 trying to build the house and really just focus on that, focus  
25 on my family. The level of tension in this country was extreme,  
26 to say the least. And I really wanted to focus on putting my  
27 family in a better situation which meant actually going off grid  
28 if that was even possible because as an unvaccinated person

1 there was a lot of rhetoric about actually being able to  
2 participate in society.

3 So we chose to sell the house. We purchased  
4 land. We were going to build a house. And I ended up -- we  
5 ended up in an apartment together, the three of us with my  
6 daughter in just outside of Kingston. And we were there working  
7 on plans for the house.

8 **MR. JOHN MATHER:** And prior to participating in  
9 the protest in Ottawa had you been politically active?

10 **MR. TOM MARAZZO:** No, I was not.

11 **MR. JOHN MATHER:** And I understood -- but please  
12 correct me if I'm wrong -- that you've never been a trucker?

13 **MR. TOM MARAZZO:** No, sir.

14 **MR. JOHN MATHER:** And you say in your statement  
15 that you arrived in Ottawa on January 30<sup>th</sup>, which I believe is  
16 the first Sunday; does that sound right?

17 **MR. TOM MARAZZO:** Yes.

18 **MR. JOHN MATHER:** Okay. And what brought you to  
19 Ottawa?

20 **MR. TOM MARAZZO:** Through a mutual friend of mine  
21 and James Bauder and his wife Sandy, I was contacted on the  
22 phone that Sunday morning. And I was asked if I would take a  
23 phone call with James and Sandy just to discuss some logistical  
24 organizational ideas around the convoy. I had been tracking the  
25 convoy as it was coming across Canada and I was absolutely a  
26 supporter of it. I really loved what this whole entire Freedom  
27 Convoy was about.

28 So in that discussion which lasted approximately

1 15 minutes, James had asked me if I would come to Ottawa and  
2 support the convoy in any way that I could in terms of getting  
3 organized with logistical stuff. And within three hours of that  
4 phone call I was actually at the ARC Hotel.

5 **MR. JOHN MATHER:** Who was the mutual friend?

6 **MR. TOM MARAZZO:** Her name is Jane Moffatt, I  
7 believe. I had only ever met her once in person. And that was  
8 -- I actually -- I think I've spoken to her one time since the  
9 convoy.

10 **MR. JOHN MATHER:** When you first spoke with Mr.  
11 Bauder what did you know about him?

12 **MR. TOM MARAZZO:** Nothing.

13 **MR. JOHN MATHER:** What did you learn about him  
14 when you spoke about him -- spoke with him, sorry?

15 **MR. TOM MARAZZO:** I learned that there was a  
16 great need to get organized and from him personally the details  
17 -- I never got any details about him personally or his wife  
18 Sandy. I knew they were two people that were trying to effect a  
19 change in this country and I wanted to help them out. So there  
20 was an opportunity for me to employ the skills that I have  
21 gained over my career, and so I recognized it as a great  
22 opportunity to get involved.

23 **MR. JOHN MATHER:** Do you have any sense how James  
24 Bauder identified you as someone who might be able to assist?

25 **MR. TOM MARAZZO:** I think Jane had mentioned to  
26 him that I was retired military. And I think that's pretty much  
27 it.

28 **MR. JOHN MATHER:** After that initial phone



1 conversation with Mr. Bauder, how often were you two in  
2 communication?

3 **MR. TOM MARAZZO:** I had seen James when I first  
4 arrived at the ARC, and then it was somewhat sporadic. I think  
5 he moved to a different location. I don't know where. I know  
6 he had a room in the ARC. And I would occasionally run into  
7 him. My contact with him was very sporadic.

8 **MR. JOHN MATHER:** When you arrived at the ARC  
9 Hotel in Ottawa, what did you learn about the organization of  
10 the protests?

11 **MR. TOM MARAZZO:** Really, when I walked into the  
12 -- like, I was brought into a boardroom and there were several  
13 truckers and two OPS police officers, Sgt. Fung Li, Sgt. Lou  
14 Carvelho. And the meeting had already begun and I was asked to  
15 turn my cell phone off or remove it from the room and give the  
16 police my name, which I did.

17 And then I just quietly sat there. James  
18 actually brought me in the room and introduced me and I believe  
19 he oversold my career. I know there was people in the room that  
20 actually thought I was a retired General, which is clearly not  
21 the case.

22 And so I sat there quietly and I just listened.  
23 And it was a very telling meeting. I got the feeling that after  
24 two days of the convoy being there this was the very first  
25 collective meeting that they had actually had in a room.

26 I could be wrong about that but I didn't get the  
27 sense that this group of people had ever come together with the  
28 Ottawa Police or any representative of the government of any

1 kind.

2 **MR. JOHN MATHER:** And we've heard the name Fung  
3 Li. Was it your understanding that those -- him and the other  
4 officer were members of the PLT?

5 **MR. TOM MARAZZO:** They were.

6 **MR. JOHN MATHER:** And who were the other truckers  
7 in the room?

8 **MR. TOM MARAZZO:** The details of that are a  
9 little sketchy. They weren't all truckers. Dana Metcalfe was  
10 somebody that I sat beside. Joe Bourgault was in the room and  
11 Ryan Olsen, his son-in-law.

12 There was Brigitte Belton, I believe was in the  
13 room. Some of the other names I just -- I didn't know who they  
14 were when I first walked into the room so I can't really account  
15 for who everybody was in the room.

16 **MR. JOHN MATHER:** And I'll return to who you were  
17 dealing with in a minute.

18 Can you just perhaps provide some more context or  
19 an explanation about how it was the case that you received a  
20 phone -- like, what drove you to go to Ottawa after receiving a  
21 phone call from a man that you'd never met before and you didn't  
22 know anything about that would have you leave, you know, your  
23 wife and your kids to go and do that?

24 **MR. TOM MARAZZO:** To be perfectly honest, I think  
25 it was a case of fear. I had over the time of COVID noticed  
26 things that I had never before believed that I would see in  
27 Canada related to the way the police and bylaw and the  
28 government were going after Canadians. And for the first time

1 in my life I was, you know, actually afraid of police. And I  
2 have several friends that are police officers.

3 And I had a phone call with Randy Hillier one  
4 day. And Randy didn't know who I was. This was -- I sent an  
5 email to him and Roman and other people and months later his  
6 office had returned the call. And Randy doesn't even recall the  
7 conversation. And I said, "You know, I spent 25 years of my  
8 life in the military and for the first time I'm actually afraid  
9 in my own country."

10 And he said, "You know, never be afraid. You  
11 can't be afraid of the police or the government. They're here  
12 to serve us."

13 And I think for me that kind of flipped a switch  
14 where I was like I went from thinking I'm afraid to get arrested  
15 or beaten by the police or getting an \$880 fine to, "You know  
16 what? Now I want the fine. I'm done. I'm not going to hide  
17 from these people anymore." And that started to mentally  
18 transition the way I thought. And then we came to a point where  
19 I thought, "Well, at some point the lawyers are going to step in  
20 and intervene and start protecting the public," and they didn't,  
21 except for a few.

22 Then when the Covid mandates -- the vaccine came  
23 out, I thought, "Well, the community's going to stand up and put  
24 a stop to this because of informed consent." And they didn't,  
25 except for a few. And it was the truckers that gave me an  
26 opportunity to actually get into, you know, fighting for my  
27 kids' rights.

28 **MR. JOHN MATHER:** The phone call you mentioned

1 with Mr. Hillier, was that in the context of the Ottawa protests  
2 or did that happen before?

3 **MR. TOM MARAZZO:** No, it was months before when I  
4 still was employed and still lived in -- I don't know if I was  
5 employed. I think it was -- I still lived in my old house prior  
6 to selling it and moving to the Napanee area.

7 **MR. JOHN MATHER:** When you arrived in Ottawa, did  
8 you have a sense of how long you were planning on being there?

9 **MR. TOM MARAZZO:** No, I -- I had bag with five  
10 changes of clothes. I believed that at the time I would go  
11 there, get organized, start to just kind of develop a daily  
12 sustainment plan and a routine, and then I would like for  
13 somebody who was able to basically take over for me and then I  
14 would move on if I wasn't required anymore.

15 **MR. JOHN MATHER:** So when you arrive and, you  
16 know, you've spoken to Mr. Bauder on the phone, he brings you  
17 into this room where there's protesters and some police, what  
18 happens next? How do you integrate yourself into the  
19 organization?

20 **MR. TOM MARAZZO:** That particular meeting  
21 actually got quite animated, very loud. I remember Brigitte  
22 being quite upset with Sergeant Li where she had made a comment  
23 of -- basically to the effect of, "What, are you going to shoot  
24 us in the streets?" Like, that's where the level had gone. And  
25 it had started to calm down. Eventually, the two police  
26 officers departed from the meeting and we all just kind of sat  
27 around and regrouped. I think people went for breaks. And then  
28 we -- people left the room.

1 I remember Brigitte and I being in the room and  
2 right around that time I think somebody brought in the map. And  
3 so I had learned there was a list of places that the OPS had  
4 requested that we not go near, like roads that we stay off of,  
5 and I said, "Okay, great, we've got the map. Let's start  
6 marking the map." And for me what was really important, because  
7 I had spent -- my son has a very severe heart condition and I  
8 spent Christmas this year in the hospital with my son. And so,  
9 you know, I'm very aware of keeping the emergency lanes open;  
10 it's an important issue for me. So the first thing we did was  
11 start identifying hospitals. We identified the police station,  
12 fire departments, vulnerable infrastructure, and then started to  
13 plan out the routes to those in an effort to really make sure  
14 those lanes were always accessible. So that's really where we  
15 started. And then we -- I needed to get a handle on where all  
16 the vehicles were located and that was a monumental task  
17 because, at the time, trucks were coming into the city, trucks  
18 were leave the city, there was a huge just change in our overall  
19 size of the convoy overall. So really, that first day was about  
20 getting a handle on where everybody was and the size and scope  
21 of the convoy.

22 **MR. JOHN MATHER:** I take it that this involved  
23 meeting a lot of people you had never before?

24 **MR. TOM MARAZZO:** Yes, everybody.

25 **MR. JOHN MATHER:** Did anyone ask you who you were  
26 and what you were doing there?

27 **MR. TOM MARAZZO:** James had introduced me  
28 initially into that meeting so everyone just realized there was

1 an army guy in the room and so I think -- my sense was right  
2 away that nobody was in charge, particularly. There were strong  
3 personalities, people with strong opinions but, for some reason,  
4 and I don't know why, I think it was just the fact that I was an  
5 army guy that people assumed that I was going to be able to get  
6 organized. And to be perfectly honest, it was quite -- it's  
7 nothing unusual for an army officer to be able to do what I did,  
8 but it was just trying to get organized.

9 **MR. JOHN MATHER:** When you say "in charge" and  
10 "get organized", do you mean get organized -- are you talking  
11 about logistics?

12 **MR. TOM MARAZZO:** Logistics. My focus was really  
13 just on logistics and a sustainment plan, not any other -- I  
14 wasn't thinking in a tactical sense. I was thinking just purely  
15 in sustainment to make sure that people could get food, fuel,  
16 money, if they needed it for whatever purpose. That was really  
17 what my thinking was at the time.

18 **MR. JOHN MATHER:** So emergency lanes ---

19 **MR. TOM MARAZZO:** Yes.

20 **MR. JOHN MATHER:** --- fuel, food, money.  
21 Anything else that you would consider as part of being  
22 responsible for logistics?

23 **MR. TOM MARAZZO:** There was -- a big task, which  
24 was really, really difficult, was to find the numbers and the  
25 composition of all the different types of trucks and where  
26 everybody was scattered. And then I learned that we had trucks  
27 out on the parkway. We had vehicles out on 88, Arnprior,  
28 locations I never actually made it to. But it was just trying

1 to get a good situational awareness, or SA, of what was  
2 happening on the ground.

3 **MR. JOHN MATHER:** When you arrived on the 30<sup>th</sup>,  
4 and I guess probably moving into the 31<sup>st</sup>, did you come to  
5 understand that there had already been people in Ottawa who were  
6 working on food, logistics, and money?

7 **MR. TOM MARAZZO:** I did not know that until, I  
8 believe, late that first evening, and that is when I met Tamara  
9 and found out that there was an alternate coordination centre at  
10 the Swiss Hotel.

11 **MR. JOHN MATHER:** Okay. And can you -- what did  
12 you learn about the alternate coordination centre at the Swiss  
13 Hotel?

14 **MR. TOM MARAZZO:** Just that it had existed and  
15 that, in those conversations, it was agreed that my scope of  
16 what I was interested or involved in was now going to be really  
17 cut in half. And I was quite happy about that because I didn't  
18 want to get into a situation where I had to think about  
19 security, public speaking and a stage, and all of that stuff I  
20 had learned about. I didn't have to worry about doing first-  
21 aid; that was going to be handled by the other group. We were  
22 just really going to focus on the logistics in terms of feeding,  
23 fuel, and then truck movement. So that was another piece of my  
24 responsibility would be moving vehicles in and out and around  
25 the city.

26 **MR. JOHN MATHER:** Was it the case that no one was  
27 organizing feeding and fuel before your arrival?

28 **MR. TOM MARAZZO:** No, and that's the surprising

1 this because that was happening. I mean that just -- that just  
2 does happen. I mean the number of supplies and fuel that was  
3 coming into the city, it actually did make what I was trying to  
4 do a lot more easy because that was just organically happening  
5 anyway. I mean, when people are hungry, they go on -- go  
6 searching for food.

7 **MR. JOHN MATHER:** So I'm going to do this in a  
8 bit of a two-part question ---

9 **MR. TOM MARAZZO:** Sure.

10 **MR. JOHN MATHER:** --- and bear with me if it  
11 presents a problem, but can you explain to me what was happening  
12 in terms of where food and fuel was coming from before your  
13 arrival and then what changed after your arrival or what you did  
14 to change anything?

15 **MR. TOM MARAZZO:** To be honest, I don't know  
16 where -- where they were getting their supplied enroute to  
17 Ontario -- or to Ottawa. But I had seen a lot of social media  
18 videos and seeing people on the overpasses, at truck stops, so I  
19 know that all along the way they were collecting food and  
20 donations -- everything that I had seen on social media. And so  
21 when -- I believe when they arrived in Ottawa, the -- it was the  
22 intention of the public to continue to come to the City of  
23 Ottawa and give more supplies as much as they could possibly  
24 give.

25 **MR. JOHN MATHER:** Did you learn anything about  
26 the Adopt a Trucker campaign that was being spearheaded by Chris  
27 Garrah?

28 **MR. TOM MARAZZO:** I learned about it a few days



1 later. I didn't really know much about it. I -- my  
2 interactions with Chris were very little. It wasn't inside --  
3 it wasn't something inside of my area of influence that I was  
4 concerned about. It was something that was kind of going on in  
5 the background so I didn't interact with it.

6 **MR. JOHN MATHER:** How was fuel supplied to  
7 truckers that were in downtown core?

8 **MR. TOM MARAZZO:** There were, I think, different  
9 sources coming. Sorry, I can't remember the name of the type of  
10 vehicle; it's a fuel truck. It's probably written. I'm not a  
11 trucker so some of the lingo, I wasn't fully conversant on. I  
12 just -- I know that they were getting a lot of fuel but it  
13 wasn't until after it was forbidden to bring in more fuel with  
14 bigger trucks and stuff to refuel them that people started to  
15 bring in the jerrycans by hand.

16 **MR. JOHN MATHER:** And was that something you  
17 assisted in organizing?

18 **MR. TOM MARAZZO:** No. No, that was -- by that  
19 point, my role had kind of been modified a little. It had sort  
20 of transitioned a little bit later on, about a week after or so.  
21 I just knew they were getting in fuel. The truckers were taking  
22 care of their own fuel. And there was no shortage of the fuel  
23 up until the Ottawa Police forbid them bringing in trucks of  
24 fuel, and then it was jerrycans. And that was not my idea.  
25 That was just people being very, very industrious.

26 **MR. JOHN MATHER:** Did you do anything to  
27 coordinate fuel into the downtown Ottawa at any point?

28 **MR. TOM MARAZZO:** I did not have to, no.

1                   **MR. JOHN MATHER:** One of the things you said you  
2 did was get a sense of the number and composition of the types  
3 of truck.

4                   Two -- first question; how did you go about doing  
5 that?

6                   **MR. TOM MARAZZO:** I literally had to go and send  
7 people out and count trucks in the streets.

8                   **MR. JOHN MATHER:** And do you recall what was the  
9 result of that calculation?

10                  **MR. TOM MARAZZO:** Well there was different areas  
11 so I remember speaking to one person who after -- it took four  
12 days just to get that magic number of 322. That was a head  
13 count; that was literally somebody going out with sticky notes  
14 on streets and then actually breaking down by vehicle; it was  
15 incredibly difficult to get an accurate count because trucks  
16 kept coming and trucks kept going in and out of the city or out  
17 to different locations. So at some point I just kind of gave up  
18 on that as a -- something that I really needed to focus on. I  
19 was just kind of more interested in, you know, general terms,  
20 where do we have vehicles sent for a mass kind of thing; I  
21 didn't need the details of where they were.

22                  **MR. JOHN MATHER:** But at some point in time it  
23 was determined there was roughly 322 trucks?

24                  **MR. TOM MARAZZO:** That was our count and I knew  
25 -- and honestly I knew that that count -- I could I shouldn't  
26 say "honestly" when I've sworn an oath, but I really -- I didn't  
27 have a lot of confidence in the number just because of the  
28 influx and outflux of vehicles. So even when I got that number

1 it wasn't overly valuable to me.

2 **MR. JOHN MATHER:** At any point did you feel that  
3 you had a handle on the number of trucks that were in the City  
4 and then were coming and going or was that something that always  
5 changed?

6 **MR. TOM MARAZZO:** It always changed; and, again,  
7 it just -- it lost value in knowing that specific number. The  
8 point of interest for me was that we had more trucks  
9 concentrated on Wellington.

10 **MR. JOHN MATHER:** With respect to clearing  
11 emergency lanes, the Commission has heard evidence, including  
12 from Mr. Barber and Mr. Wilson, that the emergency lanes -- let  
13 me back up. The protestors weren't able to keep the lanes clear  
14 on Rideau, Sussex and at Kent; does that sound correct?

15 **MR. TOM MARAZZO:** Sometimes, yes, that's true.

16 **MR. JOHN MATHER:** It was not left open, to your  
17 knowledge?

18 **MR. TOM MARAZZO:** My understanding was when that  
19 did happen and it happened occasionally -- for example, Sergeant  
20 Lee had been let's say vigorously contacting me to clear out one  
21 of the intersections and he kept asking me, you know, if I had  
22 gone down there and checked it. So I finally -- I didn't send a  
23 runner; I went down for myself, to see it for myself. And what  
24 I discovered was, there was heavy equipment owned by the City,  
25 concrete barriers and five Ottawa Police officers standing in  
26 the intersection; it wasn't being blocked by any of our people  
27 at all.

28 So I -- you know, there was a give and take where

1 we were sent or I was sent or other people that I was with were  
2 sent to go look at an intersection only to find out it wasn't  
3 even us. And I had two members that I was working with that  
4 routinely, when we were asked by OPS to go and check on a safety  
5 lane or an intersection or something that was blocking safety,  
6 our two people would go down and physically speak to the drivers  
7 and get them to open up those lanes.

8 **MR. JOHN MATHER:** And so it's my understanding  
9 that those efforts were generally successful except on Kent  
10 Street; is that correct?

11 **MR. TOM MARAZZO:** I can't say the street; is that  
12 -- Kent is right near the Rideau -- or sorry, I'm fuzzy on some  
13 of the streets.

14 **MR. JOHN MATHER:** Okay. So the evidence has been  
15 there's been two locations, one's Rideau/Sussex ---

16 **MR. TOM MARAZZO:** Yes.

17 **MR. JOHN MATHER:** --- which we'll talk about in a  
18 moment. To your knowledge was there another location that was  
19 -- where the emergency lanes were not open?

20 **MR. TOM MARAZZO:** No. The only sticking point  
21 was Rideau. And even on Rideau, I spoke to one of the drivers  
22 personally and I said "You need to make sure you keep a safety  
23 lane" and he said "They have twice moved out of the way; they  
24 sit in their trucks and they listen for ambulances or they  
25 listen for sirens and if they hear it, they move the truck out  
26 of the way because three times they had listened to the Ottawa  
27 Police who said, "You know, can you please move the vehicle?",  
28 and they would move the vehicle and the Ottawa Police would move

1 their cars in that spot and they would trick the drivers. So  
2 the drivers at Rideau said "We're not falling for it again;  
3 we'll sit in our truck; we will listen for sirens and when we  
4 hear it, we will move". And he assured me that on two occasions  
5 they did exactly that.

6 **MR. JOHN MATHER:** Do you know who you were  
7 speaking with who gave you that information?

8 **MR. TOM MARAZZO:** I don't know his name; I know  
9 where he was parked. He was parked -- I know where he was  
10 parked. I don't know his name; I know he had a paper bag full  
11 of letters from children.

12 **MR. JOHN MATHER:** I understand from your  
13 statement and from some of the evidence, that you had several  
14 interactions with the people who were at Rideau and Sussex; is  
15 that correct?

16 **MR. TOM MARAZZO:** Yes, sir.

17 **MR. JOHN MATHER:** What did you come to learn  
18 about who was in that intersection?

19 **MR. TOM MARAZZO:** There was a polish contingent,  
20 a Polish Canadian contingent; there was French Canadians and I  
21 know there was Anglophones on that corner; there was many  
22 different groups of people on that corner.

23 **MR. JOHN MATHER:** The Commission has heard many  
24 adjectives to describe the group but I'll put to you the  
25 suggestion that they've been described as difficult or  
26 standoffish; would you agree with that?

27 **MR. TOM MARAZZO:** I know there was a reputation  
28 prior to me going there and speaking to some of them. I didn't

1 get the sense that they were difficult. I got the sense that  
2 they were -- they were there for their own reasons which were  
3 separate from the overall convoy itself, most of the people that  
4 I was interacting with. But I got the feeling they were there  
5 for their families, for their communities. I know one driver I  
6 spoke to said that he didn't have anything to go back to until  
7 these mandates were lifted and they were quite determined. I  
8 didn't find them to be difficult; I just -- there was a little  
9 bit of a language barrier with one of the French-speaking men  
10 that I spoke to, but I didn't find it difficult; I just found it  
11 a different style of motivation.

12 **MR. JOHN MATHER:** We've heard a bit again about  
13 -- with respect to French-Canadian protestors there; were you  
14 familiar with the "Farfadaas" at the time?

15 **MR. TOM MARAZZO:** Not until I've been sitting in  
16 the audience here.

17 **MR. JOHN MATHER:** Would you say there was  
18 anything different in the make-up of the group at Rideau/Sussex  
19 than at any of the other locations?

20 **MR. TOM MARAZZO:** Just that they were more  
21 independent than the rest of the convoy.

22 **MR. JOHN MATHER:** As you began to work on  
23 clearing emergency lanes, interacting with the police, working  
24 with the protestors, what did you come to understand the  
25 organization of the protestors to be?

26 **MR. TOM MARAZZO:** Very, very decentralized. I  
27 learned that the truckers were not from big organizations, that  
28 they were actually independent owner/operators of their

1 vehicles, and that you really -- you really had to be respectful  
2 of the position that they were in. They were individual  
3 business owners; they weren't going to take orders from anybody.  
4 You know, they weren't going to take orders from me just because  
5 I said, you know. I had no legitimate or legal authority to  
6 tell anyone to do anything and I wasn't signing anyone's pay  
7 cheque. This was a case where you -- you know, you had to use  
8 your soft skills to communicate and get people to buy in with  
9 what you were trying to do collectively.

10 **MR. JOHN MATHER:** To your mind were there any  
11 leader or leaders of the group?

12 **MR. TOM MARAZZO:** I think there were people that  
13 were in leadership positions. You know, for example, Chris  
14 Barber is a very charismatic person. He's an honest person;  
15 he'll just tell you the way it is and he was very, very  
16 effective at communicating with truckers and it didn't matter  
17 what their backgrounds were. They were all truckers.

18 And so Chris was very influential speaking with  
19 truckers. Tamara was very influential. Brigitte was  
20 influential in her own way and many of the other people that  
21 were there working under the ARC had developed networks and they  
22 were always trying to broaden the network to communicate the  
23 things that we were all trying to do. And that was -- a lot of  
24 stuff was -- like we've got speeches on Saturday and trying to  
25 communicate that to the public and really work the social media  
26 angles because we were getting vilified badly, in such a  
27 grotesque way by the legacy media, that we made a conscious  
28 effort at one point to go into the trucks with cameras and get

1 truckers to tell their stories on social media. So they were --  
2 the leaders were out there developing that kind of messaging to  
3 get out to all the supporters across Canada that had given us  
4 \$20 million to be there.

5 **MR. JOHN MATHER:** Did you ever interact with Pat  
6 King while you were in Ottawa?

7 **MR. TOM MARAZZO:** I did.

8 **MR. JOHN MATHER:** And can you tell us what your  
9 interactions were and what your impression of him was?

10 **MR. TOM MARAZZO:** Really, my interactions were  
11 very little with Pat King and it was overly impactful, to be  
12 honest. I just -- I had spent maybe two to three occasions in  
13 his presence, and it was very little. I know that at one point  
14 there were some slow rolls and I had requested that one of the  
15 other members go with Pat because I know Pat was leading that  
16 convoy, and I made sure that the person I sent kept him well  
17 behaved.

18 **MR. JOHN MATHER:** Are you talking about the slow  
19 rolls at the airport?

20 **MR. TOM MARAZZO:** Yes, sir. Yeah.

21 **MR. JOHN MATHER:** And why did you think you  
22 needed to send someone to keep Pat King well behaved?

23 **MR. TOM MARAZZO:** Because I only knew Pat through  
24 reputation and one or two interactions with him, and I didn't  
25 want there to be any confusion as to what they were there to do.  
26 It was to really just do a slow roll and to guarantee that in no  
27 way did we stop at the airport because we were well aware that  
28 there was an orange helicopter route for the hospital. We



1 wanted to make sure that we had no impact on any air ambulance  
2 ability to get in and out of that airport.

3 We had no intention of slowing down or disrupting  
4 the airport, and I wanted to make sure that we had somebody that  
5 was going to guarantee that we weren't there to close down or  
6 lock down the airport or disrupt the air ambulance. We just  
7 wanted to basically send a message that, you know, we can still  
8 move around the city.

9 **MR. JOHN MATHER:** So I take it -- so one of your  
10 concerns was potentially that Mr. King might try to shut down  
11 the airport or blockade the airport?

12 **MR. TOM MARAZZO:** It was just on my part, to be  
13 honest, and some of the others that we discussed it. It was  
14 just a precaution, just to make sure we -- we also believed that  
15 if we told him not to do something like that, he would listen.  
16 I don't ---

17 **MR. JOHN MATHER:** So you take a precaution when  
18 you're concerned that something ---

19 **MR. TOM MARAZZO:** Yes.

20 **MR. JOHN MATHER:** --- might happen? So is that -  
21 --

22 **MR. TOM MARAZZO:** Yes.

23 **MR. JOHN MATHER:** --- what you were concerned  
24 would happen?

25 **MR. TOM MARAZZO:** Yes.

26 **MR. JOHN MATHER:** Okay. And was your concern  
27 based on Mr. King's reputation, as you indicated?

28 **MR. TOM MARAZZO:** Yes, just solely on his

1 reputation. That was it.

2 **MR. JOHN MATHER:** And what was Mr. King's  
3 reputation?

4 **MR. TOM MARAZZO:** A little bit of a -- a little  
5 bit of a wild card. I remember in a meeting once that I had  
6 jokingly referred to him as a hand grenade going off in a room  
7 and scaring everybody else that he was -- it was going to  
8 explode. And it was a bit of a joke. He laughed. Everybody  
9 else seemed to think it was funny, but it was kind of like,  
10 funny, because yeah, that's true.

11 But just reputation-wise, he was a little bit of  
12 a wild card, and I just wanted to make sure that we were able to  
13 contain anything like that.

14 **MR. JOHN MATHER:** Were you concerned it was  
15 possible that Mr. King may not engage in peaceful protest?

16 **MR. TOM MARAZZO:** That was never a concern that I  
17 shared or had.

18 **MR. JOHN MATHER:** And you mention that you had  
19 dealt with Mr. Bauder rather sporadically ---

20 **MR. TOM MARAZZO:** Yes.

21 **MR. JOHN MATHER:** --- after the initial phone  
22 conversation, introduction. At any point did you become aware  
23 of the Memorandum of Understanding, which I'm sure you've heard  
24 about over the last few weeks, or the last few days, at least?

25 **MR. TOM MARAZZO:** Yes, sir. I did hear of the  
26 Memorandum of Understanding. I learned about it once it was  
27 submitted already to, I believe, the governor general. And I  
28 think the media had a copy and I had read it.

1           Again, I'm no lawyer, but I know it wasn't  
2 written by a lawyer. It wasn't very well written, and I  
3 remember having a conversation, once I learned about the MOU,  
4 with somebody that I believed to be involved in drafting the MOU  
5 and it was a private, one-on-one meeting, and I said, "You must  
6 retract that. If you do not retract that or pull it back or put  
7 the genie back in the bottle, we are going to denounce it."

8           It made us look like we were here for a  
9 completely different purpose than what we were there for. It  
10 really muddied the waters, and I don't know if as a result of  
11 that conversation they pulled it back. I just know that the  
12 next day it was sort of retracted.

13           **MR. JOHN MATHER:** When you say it made it look  
14 like you were there for a completely different purpose, what was  
15 that purpose?

16           **MR. TOM MARAZZO:** Well, I had read it, and as far  
17 as I was concerned, it was -- we were there for the mandates.  
18 That MOU was there for a different purpose, and I don't remember  
19 the details of it, to be honest. I skimmed through it. It was  
20 not very well written. And so I didn't think it was credible, I  
21 didn't think it was appropriate, and I certainly didn't think  
22 that the government was ever going to suddenly resign because  
23 somebody sent them a memo.

24           **MR. JOHN MATHER:** You may not remember the  
25 details, but was your concern that what the MOU appeared to call  
26 for was something that was undemocratic?

27           **MR. TOM MARAZZO:** What I believed when I read it  
28 was that they thought that it was a legal process that they were

1 -- that they believed it was a mechanism of government that they  
2 were trying to initiate. Even though I'm no constitutional  
3 scholar by any means, but I could tell that it was not going to  
4 go anywhere.

5 **MR. JOHN MATHER:** You said you had a conversation  
6 with someone where you said this must be denounced. Who was  
7 that conversation with?

8 **MR. TOM MARAZZO:** I believe his name is Martin,  
9 Martin Broadman.

10 **MR. JOHN MATHER:** And it's Commission's  
11 understanding that Mr. Broadman was someone who was associated  
12 with Mr. Bauder; is that correct?

13 **MR. TOM MARAZZO:** Yes, sir.

14 **MR. JOHN MATHER:** And did he seem receptive to  
15 your message?

16 **MR. TOM MARAZZO:** I think he was upset. It  
17 didn't -- the meeting didn't end on a bad note. It wasn't --  
18 like, he was upset about it. He had been working on this, I  
19 believe, since the year before the convoy had even arrived.  
20 This was something that they were working on that they thought  
21 they were doing something that was legitimately recognized by  
22 the legal system. And he was upset that he wasn't getting  
23 support, but I believe at the end of that meeting, he said,  
24 "Okay. We will -- we'll pull it back."

25 **MR. JOHN MATHER:** You've been referred to in  
26 media and some of the documents we received as the spokesperson  
27 for the protestors. Did you identify yourself to anyone as the  
28 spokesman?

1                   **MR. TOM MARAZZO:** No, sir.

2                   **MR. JOHN MATHER:** Sorry, spokesperson.

3                   **MR. TOM MARAZZO:** No.

4                   **MR. JOHN MATHER:** Did you see yourself as a  
5 spokesperson?

6                   **MR. TOM MARAZZO:** The last two days, on the 18th  
7 and 19th of February was the one -- or the two times only during  
8 the convoy that I had chosen to speak without being -- or  
9 without discussion with other members of the convoy, and that  
10 was because I felt that given the previous media stuff that I  
11 had done, alternative media or livestreams, that I would be  
12 recognized by the public as somebody associated with maybe some  
13 of the other people like Tamara and Chris and Brigitte, because  
14 everybody else was either out of the city or were already  
15 incarcerated, so there was nobody left that I believed the  
16 public would recognize as a credible person to deliver those two  
17 final days' worth on the 18th and 19th. And that's the only  
18 time. Other than that, I was always asked to speak on the  
19 livestreams.

20                   **MR. JOHN MATHER:** Right. And you did. on  
21 multiple occasions, either speak on livestreams or in sort of  
22 forums or press conferences; is that fair?

23                   **MR. TOM MARAZZO:** Yes.

24                   **MR. JOHN MATHER:** And it's our understanding --  
25 but again, correct me if I'm wrong -- that the first one was on  
26 February 7th. Does that sound correct?

27                   **MR. TOM MARAZZO:** The 7th or 8th, yes, and then  
28 on the 10th, and I did clean up some of the confusion that I had

1 caused on the initial.

2 **MR. JOHN MATHER:** Well, let's talk about some of  
3 that confusion right now then. So you -- as our -- again, it's  
4 our understanding that this is the 7th ---

5 **MR. TOM MARAZZO:** Yes.

6 **MR. JOHN MATHER:** --- that you gave a press  
7 conference. Mr. Barber was there, Ms. Belton was there, Ms.  
8 Lich was there ---

9 **MR. TOM MARAZZO:** Yes.

10 **MR. JOHN MATHER:** --- and some of the organizers?

11 **MR. TOM MARAZZO:** Yes.

12 **MR. JOHN MATHER:** Do you know what I'm referring  
13 to?

14 **MR. TOM MARAZZO:** I do.

15 **MR. JOHN MATHER:** And how did that press  
16 conference come about?

17 **MR. TOM MARAZZO:** I do not remember the person  
18 who asked me or the group of people who asked me to speak, but I  
19 had -- I believe just previous to that, we -- it was the night  
20 after the -- or the night of the Coventry raid that we did a  
21 livestream as a larger group. And it seemed to go okay with, I  
22 guess, my presence on the video.

23 So I was asked the next day to deliver a message  
24 on a livestream. And I don't remember who asked me to do it. I  
25 just know that I was asked to do it, and that I would be  
26 accompanied by several members of -- well, I think the entire  
27 Board as well as two doctors who were in attendance in that  
28 video.

1                   **MR. JOHN MATHER:** So if we could pull up  
2 COM00000884, and as it's coming up, Mr. Marazzo, this is -- you  
3 can confirm if it is the case, but we understand that this is  
4 the press conference.

5                   **MR. TOM MARAZZO:** Yes.

6                   **MR. JOHN MATHER:** And then ---

7                   **MR. TOM MARAZZO:** Yes, this is it.

8                   **MR. JOHN MATHER:** This is it? Okay.

9                   If you could pause it please and go to the 7:25  
10 mark, and then play from 7:25 to about 8:21.

11   (VIDEO PLAYBACK)

12                   **MR. JOHN MATHER:** One quick question and then I'm  
13 going to ask you about the statement that caused confusion.  
14 When you made a reference to a 22-caliber Ermine and a 357  
15 World, this has been something that's been reported on, were you  
16 referencing Mr. -- Prime Minister Trudeau?

17                   **MR. TOM MARAZZO:** I was.

18                   **MR. JOHN MATHER:** In the video you say, "I'm  
19 willing to sit at a table with..."

20                   **MR. TOM MARAZZO:** Can I just continue to answer,  
21 because I've been ---

22                   **MR. JOHN MATHER:** Sorry, I didn't ---

23                   **MR. TOM MARAZZO:** --- vilified in the media for  
24 that one.

25                   **MR. JOHN MATHER:** Yeah, I didn't mean to cut you  
26 off.

27                   **MR. TOM MARAZZO:** Yeah.

28                   **MR. JOHN MATHER:** Please go ahead.

1           **MR. TOM MARAZZO:** It's a joke. I literally meant  
2 to comment on the man's intelligence. It was a joke. Sorry.

3           **MR. JOHN MATHER:** No, understood. Sorry.

4           **MR. TOM MARAZZO:** Yeah.

5           **MR. JOHN MATHER:** You can take the video down.

6           **MR. TOM MARAZZO:** Thank you.

7           **MR. JOHN MATHER:** Then you said, "I'm willing to  
8 sit at a table with the Conservatives and the NDP and the Block  
9 as a coalition. I'll sit with the Governor General. Put us at  
10 the table with somebody that actually cares about Canada."

11           **MR. TOM MARAZZO:** Yes.

12           **MR. JOHN MATHER:** What did you mean when you said  
13 that?

14           **MR. TOM MARAZZO:** In no way did I ever mean or  
15 intend for us to be part of the government. I wanted them to  
16 come and sit literally at a table and start figuring out a way  
17 to be an effective opposition to the Liberal Party of Canada,  
18 because we weren't seeing any opposition at all with the  
19 official opposition of Canada.

20           You know, if the Conservative Party had been  
21 effective as being an opposition, we may not be in this room  
22 today. But instead, they just didn't oppose anything that was  
23 happening to Canadians as to why we were there. And when we got  
24 there, there was no attempt at any level of government,  
25 municipal, provincial, federal government to even talk to us, to  
26 get in a room with us.

27           And you've heard the testimony here, nobody ever  
28 wanted to even have a conversation with us. So I want to say



1 that I was quite sick throughout my time during the convoy.  
2 And, you know, I was exhausted. I was dehydrated. I -- you  
3 know, lots of stuff, and in that particular moment of that  
4 video, I did misspeak. It wasn't very clear what I was getting  
5 at.

6 Two days later, I tried to clarify that, or three  
7 days later, but what we wanted was for the government, anybody.  
8 We were desperate. It was a -- basically, a cry for help to  
9 come in and sit down and do this democratically. And that is a  
10 mechanism of government, because as we've seen since then, or  
11 even during the convoy, the NDP and the Liberals were forming a  
12 coalition that the public had not yet known about. And so, you  
13 know, forming a coalition seemed to be something -- like, we  
14 were trying to nudge them, motivate them in any way we could  
15 just to talk to us. And to this day, they've never spoken with  
16 us ever.

17 **MR. JOHN MATHER:** Some media outlets who reported  
18 on this come to suggest that you were saying that the protesters  
19 wanted to form governments, which ---

20 **MR. TOM MARAZZO:** Yeah.

21 **MR. JOHN MATHER:** --- they would be in a  
22 coalition with ---

23 **MR. TOM MARAZZO:** M'hm.

24 **MR. JOHN MATHER:** --- the opposition parties, but  
25 the protesters themselves would form part of the government.

26 **MR. TOM MARAZZO:** Yeah. Like, that ---

27 **MR. JOHN MATHER:** Do you know what I'm talking  
28 about?

1           **MR. TOM MARAZZO:** That is, and that's -- that is  
2 my fault, that the way I phrase that in the video. That is not  
3 what my intention was, but the way I phrased it, I can  
4 understand that being confusing, but it's not what I intended.  
5 We wanted no part of being the government. We wanted the  
6 government to do the governing, but to listen to us.

7           **MR. JOHN MATHER:** I understand that you spoke  
8 again on February 10<sup>th</sup> and attempted to clarify your statements.

9           **MR. TOM MARAZZO:** Yeah.

10          **MR. JOHN MATHER:** I understand that. But did you  
11 take any steps to clarify what you meant with the media outlets  
12 who were reporting that the protesters wanted to form a  
13 coalition government?

14          **MR. TOM MARAZZO:** No, I was not in charge of  
15 direct contact -- I had no direct contact with the media, and as  
16 far as I was concerned, my belief was if they actually started  
17 to do their job and report fairly, we would reward them with  
18 contact, or I would, or whatever. Not necessarily me, but if  
19 they continued down the path of constantly vilifying and lying  
20 about us, I didn't see the point really of talking to them at  
21 all.

22                   We were effective, highly effective at getting  
23 out everything we wanted to get out to the public through  
24 alternative and social media.

25          **MR. JOHN MATHER:** So you didn't make any efforts  
26 to go to the ---

27          **MR. TOM MARAZZO:** No, sir.

28          **MR. JOHN MATHER:** --- reporters who had reported

1 ---

2 **MR. TOM MARAZZO:** No.

3 **MR. JOHN MATHER:** --- a different interpretation  
4 and say, "That's wrong. Can you please fix it?"

5 **MR. TOM MARAZZO:** No.

6 **MR. JOHN MATHER:** And so you don't know whether  
7 or not they would have issued a correction or issued a -- maybe  
8 not a correction, a follow-up story, you just don't know.

9 **MR. TOM MARAZZO:** I don't know. And they never  
10 reached out to talk to me from my knowledge either.

11 **MR. JOHN MATHER:** After the February 7<sup>th</sup> press  
12 conference, Benjamin Dichter, who's a witness we'll hear from  
13 later, sent out a press release saying that only himself, Mr.  
14 Barber, Ms. Lich and a woman named Dagney were authorized to  
15 speak on behalf of the protesters. Do you know what I'm  
16 referring to?

17 **MR. TOM MARAZZO:** I do. Vaguely I do, yes.

18 **MR. JOHN MATHER:** Did you ever have an  
19 interaction with Mr. Dichter where you discussed who was  
20 authorized to speak on behalf?

21 **MR. TOM MARAZZO:** My interactions with him were  
22 very -- like, I think if I added up all the entire time I've  
23 ever spent with him, I'd be lucky if it was 15, 20 minutes that  
24 I've ever spent in a room with him. So I can't really say for  
25 certain when or what was ever discussed with him. I was just  
26 not interacting with him at all.

27 **MR. JOHN MATHER:** I'm going to move forward a bit  
28 -- well, not that much forward, a day forward to your meeting

1 with Steve Kanellakos ---

2 **MR. TOM MARAZZO:** Okay.

3 **MR. JOHN MATHER:** --- which, again, the  
4 Commission has already heard a fair bit of evidence about. But  
5 I take it you recall meeting with Mr. Kanellakos?

6 **MR. TOM MARAZZO:** Yes, sir.

7 **MR. JOHN MATHER:** Why did you want to meet with  
8 Mr. Kanellakos?

9 **MR. TOM MARAZZO:** I actually didn't. I didn't.  
10 I had grown incredibly frustrated with the Police Liaison  
11 Officers that I was dealing with, and I had requested through  
12 them to talk to an Inspector. And I had also made that same  
13 concern known to the Police Liaison Officer from the Ontario  
14 Provincial Police. And I didn't want to interact with the two  
15 Sergeants that I had been dealing with anymore. I wanted  
16 somebody who was in a better position to make decisions and,  
17 also, I wasn't a hundred percent sure that our concerns were  
18 being raised up the chain of command in a way that I was  
19 comfortable with. And that's not to suggest that, you know, the  
20 two officers from Ottawa Police were bad people or anything like  
21 that. It's just I didn't get the sense that they were taking us  
22 as seriously as I would have hoped. And so I was requesting to  
23 not talk to them anymore. I wanted an Inspector. And I was led  
24 to believe that I would be talking to an Inspector one evening,  
25 and I was waiting patiently in a room by myself to speak to the  
26 Inspector, and this mystery Inspector never arrived, even though  
27 I was led to believe I would get one.

28 So I walked away from the meeting when I found

1 out I wasn't going to be talking to somebody more senior, and  
2 the next day, I believe, is when the offer came to us, or to me,  
3 to meet with somebody at the City. I -- and I had no interest  
4 in meeting anybody from the City at that point. I knew where my  
5 focus needed to be was with the police. I wasn't interested in  
6 any level of the City.

7 **MR. JOHN MATHER:** Can I pull up OPS8527? Could  
8 we go to page 3? So, Mr. Marazzo, you're not involved in this  
9 email chain, so ---

10 **MR. TOM MARAZZO:** Yeah.

11 **MR. JOHN MATHER:** --- but this is an email chain  
12 within the Ottawa Police Service. And if we can scroll up just  
13 a little bit higher, so we can see -- this is an email from John  
14 Ferguson to Mark Patterson and Robert Drummond. Do you see  
15 that?

16 **MR. TOM MARAZZO:** M'hm. Yes.

17 **MR. JOHN MATHER:** Did you ever interact with Mr.  
18 Ferguson?

19 **MR. TOM MARAZZO:** No.

20 **MR. JOHN MATHER:** Okay.

21 **MR. TOM MARAZZO:** Not to my knowledge.

22 **MR. JOHN MATHER:** Okay. And if we can scroll  
23 down? So we say here,

24 "One of our teams has already been out  
25 [to] Rideau/Sussex to speak with [the]  
26 representatives of that group."

27 And it goes on and it says,

28 "In regards to the main convoy our PLT

1 members are currently walking [...] red  
2 zone[s] with one of the main organizers  
3 Tom Marazzo who is responsible for 322  
4 trucks..."

5 Do you see that there?

6 **MR. TOM MARAZZO:** Yes, sir.

7 **MR. JOHN MATHER:** Okay. And then if we could  
8 scroll up a bit further? So this is another -- this is now an  
9 email from Mr. -- I forget his rank, so I'm going to call him  
10 Mr. Patterson. And it says,

11 "PLT members continued their  
12 conversations with Mr. Marazzo this  
13 evening. He has requested a meeting  
14 with an elected official or [City level  
15 --] City Manager level member."

16 Do you see that?

17 **MR. TOM MARAZZO:** Yes.

18 **MR. JOHN MATHER:** Do you recall, now that you've  
19 seen this, ever being the one who requested the meeting?

20 **MR. TOM MARAZZO:** From my recollection, I never  
21 had any interest in meeting with any of the elected officials in  
22 the city. I was perfectly satisfied to deal directly with the  
23 police. I wanted an Inspector. I didn't really feel that -- I  
24 certainly had no interest in meeting with the Mayor. Steve K.  
25 was -- you know, when I finally met with him I realized that  
26 maybe that was an error, that it was good to meet with Steve.  
27 But I certainly never requested, to my knowledge, to speak with  
28 any of the municipal level elected officials.

1           **MR. JOHN MATHER:** You can take that down. So we  
2 saw in the press conference you were talking, and in your answer  
3 about the press conference, you were talking about the  
4 importance of engaging with Government and speaking with  
5 Government.

6           **MR. TOM MARAZZO:** M'hm.

7           **MR. JOHN MATHER:** I appreciate you changed your  
8 mind after you met with Steve K. but why wouldn't you want to  
9 meet with a City official?

10          **MR. TOM MARAZZO:** Because really at the time I  
11 believe that was -- if I'm understanding the time right -- the  
12 timeline correctly, this is the next day after the raid at  
13 Coventry. I believe the Coventry raid was the sixth; that was  
14 the seventh. I wanted to deal directly with the police because  
15 I felt that the police were the ones that were getting the most  
16 pressure and I thought that I would be able to have a  
17 conversation with the police and try to work with them, build a  
18 rapport, because I wasn't getting anywhere, that I felt, with  
19 the two police liaison sergeants I was dealing with. I felt  
20 that if we could develop a better rapport with the police, then  
21 things would change.

22                   Second to that is, the Police Services Board  
23 meeting that we had seen the rhetoric from Diane Dean, was just  
24 incredible. And I don't know if that meeting was before or  
25 after the 7<sup>th</sup>. We just knew we needed to deal with the police.

26          **MR. JOHN MATHER:** And Mr. Wilson mentioned in his  
27 testimony on more than one occasion that you had a sense that  
28 Former Chief Sloly was -- you were concerned about the pressure

1 he was under; is that correct?

2 **MR. TOM MARAZZO:** Yeah, I had seen the recording  
3 of the Police Services Board meeting that Diane Dean had been  
4 the Chair of the Police Services Board at the time, and I was  
5 extremely concerned about the things that I had witnessed her  
6 say on the video. And so I wanted to see the reaction from  
7 Chief Sloly. And I got a little bit more concerned again so I  
8 rewound it and I watched it again; I watched her comments; I  
9 watched his reaction and I knew right there and then that the  
10 situation had fundamentally changed for all of us, them as well  
11 as us. And I realized that if we didn't do something to take  
12 the pressure off of the Chief, things were going to dramatically  
13 change for the worse. And so that's when we started to  
14 completely re-shift our focus to taking the pressure off the  
15 Chief, thereby taking the pressure off of the individual police  
16 officers and hopefully ourselves.

17 **MR. JOHN MATHER:** And, again, we heard Mr. Wilson  
18 this morning; he described that after the meeting with Mr.  
19 Kanellakos there was an initial effort ---

20 **MR. TOM MARAZZO:** Yes.

21 **MR. JOHN MATHER:** --- to move the trucks from  
22 Rideau Sussex to Wellington, and as I understand it, that effort  
23 was unsuccessful because the police ultimately didn't move the  
24 barricades that would be necessary to do that; did Mr. Wilson  
25 have that correct?

26 **MR. TOM MARAZZO:** He did, but I think I heard --  
27 we actually had -- we were -- to use a football analogy, we were  
28 on the one-yard line with all the trucks on that corner. And



1 Eva and I had spent hours on that corner. Eva was talking with  
2 the Polish truckers, I was talking with the English-speaking  
3 French truckers. We spent hours there. And we finally got --  
4 because Sergeant Lee was there and despite his best efforts,  
5 sometimes he can be a little bit hostile. And we -- I had asked  
6 the truckers to basically, as a group, come to an agreement with  
7 themselves and then also elect two people to go in and deal  
8 directly with Sergeant Lee, because I was actually concerned  
9 that if he went into the center of those 80 truckers, he would  
10 do something that would put his own safety at risk. So instead  
11 of him going to them, I said you elect two people, come out and  
12 then we'll talk. And then Sergeant Lee got that phone call. He  
13 walked away and he came back and the look on his face said  
14 everything. I knew that he had just had the carpet pulled out  
15 from under his legs and he said "There's no deal".

16 And so I was very concerned. I knew I couldn't  
17 go back to the truckers and say, "Hey, we spent all day  
18 convincing you to do this and now the police have reneged on  
19 it". I knew that there would be no further chance of ever  
20 getting them to even be open to the idea of moving had I gone  
21 back and delivered that message to them.

22 So it was -- we were there; we were there that  
23 night to move them. And I just basically went back and I said,  
24 "Listen guys, it's a safety issue; we're not going to move at  
25 night because it's too dangerous for the safety of people with  
26 decreased visibility. That's all I could come up with at the  
27 time to satisfy everybody.

28 **MR. JOHN MATHER:** And then Mr. Wilson talked

1 about another attempt that was made on February the 10<sup>th</sup> and then  
2 there was -- which was -- did not proceed.

3 **MR. TOM MARAZZO:** Yes.

4 **MR. JOHN MATHER:** And I take it you agree with  
5 Mr. Wilson?

6 **MR. TOM MARAZZO:** Absolutely, yes.

7 **MR. JOHN MATHER:** So then we come to the  
8 agreement with the Mayor and there was a meeting on February 13<sup>th</sup>  
9 at City Hall; were you at that meeting?

10 **MR. TOM MARAZZO:** The one with Inspector  
11 Drummond, Kim Ayotte and Steve K."

12 **MR. JOHN MATHER:** That's our understanding of who  
13 was there.

14 **MR. TOM MARAZZO:** Yes, I was at that meeting.

15 **MR. JOHN MATHER:** Okay. And I appreciate at that  
16 point in time; it's the case that you had indicated that you  
17 wouldn't be able to move trucks off Rideau/Sussex; is that  
18 correct?

19 **MR. TOM MARAZZO:** No, I believe at that meeting  
20 we were just there to go over more of the details on how we  
21 could properly do that and then reposition -- or redistribute  
22 the trucks in different locations. That's what my recollection  
23 of what the intent of that meeting was and the discussion. And  
24 I believe Kim Ayotte or Inspector Drummond were the ones that  
25 brought the map and we were looking at the map from sort of  
26 trying to work out how to redistribute that based on the map  
27 that they had marked themselves.

28 **MR. JOHN MATHER:** So Superintendent Drummond

1 testified that at that meeting it was represented that there was  
2 two locations where the organizers did not believe they would  
3 get by and one was Rideau/Sussex and one was with the Coventry  
4 group.

5 Do you recall anyone at the meeting from the  
6 protestors side indicating that?

7 **MR. TOM MARAZZO:** I believe that it was indicated  
8 that it would be more difficult given the events of the previous  
9 two days, the prior two days; it would be more work, more  
10 challenging but I also believe that there was a will on, you  
11 know, our part to go up and we thought we could actually get it  
12 done.

13 **MR. JOHN MATHER:** I want to talk briefly now  
14 about the final days that you were in Ottawa.

15 After February 17<sup>th</sup> and after the *Emergencies Act*  
16 was invoked, was it your understanding that protestors were  
17 allowed to enter into what's called the "Red Zone"?

18 **MR. TOM MARAZZO:** If they were on foot.

19 **MR. JOHN MATHER:** And what was the basis of your  
20 understanding that they could enter if they were on foot?

21 **MR. TOM MARAZZO:** Just based on some of the  
22 briefings from Keith Wilson and discussions with Eva; and not  
23 with vehicles, clearly, and I don't believe they would have been  
24 successful trying to get in with a vehicle anyway.

25 **MR. JOHN MATHER:** And up until at least the 14<sup>th</sup>  
26 you had been in daily contact with police liaisons; is that  
27 correct?

28 **MR. TOM MARAZZO:** Yes, sir.

1           **MR. JOHN MATHER:** Did you have any contact with  
2 them after the invocation of the *Emergencies Act* and did they  
3 give you any indication whether or not you were allow -- whether  
4 or not protestors on foot were allowed in the Red Zone?

5           **MR. TOM MARAZZO:** No, I don't think that my  
6 conversations with my regular police liaisons were like that. I  
7 did receive one phone call from an unknown OPP officer who said  
8 that he was the guy that they call for really difficult  
9 negotiations. I don't know who that person was; I just know he  
10 was OPP and he had a lot of extensive experience with  
11 negotiating. And I knew from that phone call that the mass  
12 arrests were imminent. I didn't get a date or a time, I just  
13 got -- I understood the vocabulary in the context of his  
14 comments. He didn't come out and tell me exactly when they  
15 would come in and start making mass arrests, but I knew that it  
16 was imminent.

17           **MR. JOHN MATHER:** Do you know when that phone  
18 call was?

19           **MR. TOM MARAZZO:** It was right -- I believe it  
20 was right after the *Emergencies Act* was invoked. It might have  
21 been the 15<sup>th</sup>. I can't be certain of that detail and I have no  
22 idea who that officer was.

23           **MR. JOHN MATHER:** Were you aware of the TikTok  
24 video that's been discussed a couple of times in which Mr.  
25 Wilson explains that protestors are allowed to continue to  
26 protest peacefully?

27           **MR. TOM MARAZZO:** I hadn't seen that until I was  
28 here in the audience seeing that.

1                   **MR. JOHN MATHER:** What was your reaction to  
2 seeing it now?

3                   **MR. TOM MARAZZO:** No real reaction.

4                   **MR. JOHN MATHER:** Was there at any point when it  
5 became clear to you that the police were not going to allow  
6 protestors on foot to be in the Red Zone?

7                   **MR. TOM MARAZZO:** Not until the first day when  
8 they started attacking people up in front of the Senate.

9                   **MR. JOHN MATHER:** And when -- what day was that?

10                  **MR. TOM MARAZZO:** The 18<sup>th</sup>.

11                  **MR. JOHN MATHER:** And during that time when the  
12 police began clearing the protestors, did anyone from the police  
13 ever indicate to you that there was an area where protestors  
14 could go to protest?

15                  **MR. TOM MARAZZO:** No, sir.

16                  **MR. JOHN MATHER:** Did you make any -- did you ask  
17 whether there was anywhere that ---

18                  **MR. TOM MARAZZO:** I did not.

19                  **MR. JOHN MATHER:** Is it something that crossed  
20 your mind?

21                  **MR. TOM MARAZZO:** No, not at that time. That's  
22 not really where my head space was. I was quite concerned about  
23 the things that I had personally witnessed that day. I was  
24 there when the two people were trampled by the horse. I had  
25 seen some things that I never thought that I would see in this  
26 country.

27                  **MR. JOHN MATHER:** And I've run past my time so I  
28 will ask you one last question which is, is there anything else

1 that you think is important that we should ask you about?

2 MR. TOM MARAZZO: No, sir.

3 MR. JOHN MATHER: Thank you.

4 COMMISSIONER ROULEAU: Okay. First up is the  
5 Government of Canada, please.

6 --- CROSS-EXAMINATION BY MR. BRENDAN van NIEJENHUIS:

7 MR. BRENDAN van NIEJENHUIS: Good afternoon, Mr.  
8 Marazzo.

9 MR. TOM MARAZZO: Hello.

10 MR. BRENDAN van NIEJENHUIS: I'll just have a few  
11 questions for you but I'll start with where my friend started  
12 you with. And for the record, I'm Brendan van Neijenhuis, one  
13 of the lawyers for the Government of Canada.

14 You described this call with an OPP officer that  
15 you weren't sure of exactly which officer it was in which it was  
16 indicated to you that the police were going to enforce; right?

17 MR. TOM MARAZZO: Yes.

18 MR. BRENDAN van NIEJENHUIS: And you saw earlier  
19 today the video on TikTok of Mr. Wilson advising people they  
20 could remain there on foot?

21 MR. TOM MARAZZO: M'hm.

22 MR. BRENDAN van NIEJENHUIS: Yes?

23 MR. TOM MARAZZO: Yes.

24 MR. BRENDAN van NIEJENHUIS: And you yourself  
25 acknowledged that this was not in fact the case; right?

26 MR. TOM MARAZZO: I'm sorry, I'm not  
27 understanding.

28 MR. BRENDAN van NIEJENHUIS: That people were not

1 permitted to remain in the red zone on foot.

2           **MR. TOM MARAZZO:** I thought that -- actually, at  
3 the time, I thought that that was somewhat questionable, that  
4 you would be within your right to be -- from my conversations  
5 and the briefing from Keith, that you would be within your right  
6 to be in the red zone. I just didn't think you'd get a vehicle  
7 in there but that you could remain there as long as you weren't,  
8 you know, bringing in a vehicle or anything like that.

9           **MR. BRENDAN van NIEJENHUIS:** The call you  
10 described, you thought it was on the 15<sup>th</sup>, shortly after the  
11 *Emergency Act* was invoked on the 14<sup>th</sup>?

12           **MR. TOM MARAZZO:** I -- it's in and around there.  
13 I don't know the specific date or the time that I received that  
14 phone call. I just know that that phone call was somewhat  
15 impactful, enough for me to remember. And it was a short call.

16           **MR. BRENDAN van NIEJENHUIS:** Could we go to  
17 HRF00001510? I'm showing you a copy of this email which appears  
18 to be an email from Eva Chipiuk to, among others, yourself and  
19 Mr. Wilson; do you see that?

20           **MR. TOM MARAZZO:** Yes.

21           **MR. BRENDAN van NIEJENHUIS:** And she is attaching  
22 a document that I don't think we have but it's a document  
23 entitled "The Right to Protest"; right?

24           **MR. TOM MARAZZO:** M'hm, yes.

25           **MR. BRENDAN van NIEJENHUIS:** And she indicates --  
26 and I guess this is relaying some advice received from Sayeh  
27 Hassan, Barrister and Solicitor; do you see that?

28           **MR. TOM MARAZZO:** Yes.

1                   **MR. BRENDAN van NIEJENHUIS:** And she's indicating  
2 -- or passing along a note to you and Mr. Wilson that says:

3                   "I've drafted something on the right to  
4                   protest by have taken the cautious  
5                   approach because I don't know the  
6                   emergency orders are but it's my  
7                   understanding that they can limit the  
8                   right to protest. And while that can  
9                   be challenged in court, at the moment,  
10                  people who do not comply may be  
11                  arrested."

12                  Right?

13                  **MR. TOM MARAZZO:** Right.

14                  **MR. BRENDAN van NIEJENHUIS:** Then she goes on to  
15 say:

16                  "I think that if we're advising people,  
17                  it's important to let them know all of  
18                  the risks that they're facing and let  
19                  them make their own decisions."

20                  Right?

21                  **MR. TOM MARAZZO:** Yes.

22                  **MR. BRENDAN van NIEJENHUIS:** And that's sound  
23 advice that you would agree with?

24                  **MR. TOM MARAZZO:** I would. But I would also say  
25 that -- you know, combine that with the fact that Justice McLean  
26 had ruled that we were legally within our right to be there in  
27 Ottawa during -- to have this protest, and then, you know,  
28 you're seeing an email from a lawyer who is saying that it is,



1 you know, "my understanding". So if it is not completely set in  
2 concrete for a lawyer, what chance do we have for having a  
3 definitive bit of legal advice that we can make a 100-percent  
4 absolute decision on what is going to happen to us if we remain.

5 **MR. BRENDAN van NIEJENHUIS:** So you had an  
6 interpretation of Justice McLean's order; right?

7 **MR. TOM MARAZZO:** I had -- just from what I was  
8 briefed on, the result, and that -- that -- I do remember  
9 reading the decision. And I'm not -- again, I'm not a lawyer so  
10 when I'm reading it, it's from a very unsophisticated  
11 perspective. But I do remember reading the part where it said,  
12 to the effect, that we had a legal right to be there.

13 **MR. BRENDAN van NIEJENHUIS:** All right. Well,  
14 you're not a lawyer but Ms. Chipiuk is a lawyer and Sayeh  
15 Hassan, you understand, is a lawyer as well?

16 **MR. TOM MARAZZO:** I see there on the email that  
17 they are -- this person a lawyer.

18 **MR. BRENDAN van NIEJENHUIS:** Okay. Did you take  
19 any steps to relay the risks the people are facing so that they  
20 could make their own decision with respect to the possibility  
21 that they would be arrested if they did not comply?

22 **MR. TOM MARAZZO:** I believe we handed out a  
23 French/English, double-sided piece of paper that we printed to  
24 everybody -- I think we printed out hundreds of copies and it  
25 from the pro bono legal team that we had -- that if people were  
26 arrested that was a description of what their rights would be  
27 and also the phone number to call if should happen to them.

28 **MR. BRENDAN van NIEJENHUIS:** Okay. Now, sir,

1 you're publishing a -- I understand you're publishing a book  
2 which you intend to release on February the 14<sup>th</sup> of next year; is  
3 that right?

4 **MR. TOM MARAZZO:** Yes.

5 **MR. BRENDAN van NIEJENHUIS:** And you've selected  
6 that date because it's the same date on which the report of this  
7 Commission must be tabled?

8 **MR. TOM MARAZZO:** No, it's the one-year  
9 anniversary of the *Emergency Act* being invoked.

10 **MR. BRENDAN van NIEJENHUIS:** Oh, I see. You've  
11 been attempting to raise money for the publication of this book  
12 through a fundraiser on the website GiveSendGo; correct?

13 **MR. TOM MARAZZO:** Yes, because I have a team that  
14 is helping me and they also need -- well, they need support.

15 **MR. BRENDAN van NIEJENHUIS:** Sure. Could we go  
16 to COM00000415? Sir, this is an affidavit that you swore in  
17 support of an application by Canadian Frontline Nurses; right?

18 **MR. TOM MARAZZO:** Yes.

19 **MR. BRENDAN van NIEJENHUIS:** Yes. And if we  
20 could just go down to the very bottom of the affidavit to find  
21 the jurat date. There we go. You swore this, it appears, on  
22 March the 4<sup>th</sup> of this year?

23 **MR. TOM MARAZZO:** Yes.

24 **MR. BRENDAN van NIEJENHUIS:** And if we could go  
25 back up to paragraph 4, now, here you say that you arrived in  
26 Ottawa on January the 30<sup>th</sup> with the intention of peacefully  
27 participating in the protest; correct?

28 **MR. TOM MARAZZO:** Yes.

1                   **MR. BRENDAN van NIEJENHUIS:** And you told us  
2 shortly ago that your arrival was due to the invitation extended  
3 to you to come to Ottawa by James Bauder?

4                   **MR. TOM MARAZZO:** Yes.

5                   **MR. BRENDAN van NIEJENHUIS:** And you understood  
6 he was asking for your assistance in providing some form of  
7 organization to support his objectives as part of the group  
8 identifying itself as the Convoy?

9                   **MR. TOM MARAZZO:** I wouldn't say "as his"  
10 because, to me, it was the convoy. I -- he was somebody  
11 participating in the convoy, but yes.

12                   **MR. BRENDAN van NIEJENHUIS:** Okay. Well, so  
13 whoever convoy is ---

14                   **MR. TOM MARAZZO:** Yes.

15                   **MR. BRENDAN van NIEJENHUIS:** --- that's who you  
16 were being asked to help ---

17                   **MR. TOM MARAZZO:** Yes.

18                   **MR. BRENDAN van NIEJENHUIS:** --- by Mr. Bauder?

19                   **MR. TOM MARAZZO:** Yes.

20                   **MR. BRENDAN van NIEJENHUIS:** And you became  
21 familiar, you told us, with the Memorandum of Understanding that  
22 he was circulating and intended to deliver to the Governor  
23 General and the Speaker of the Senate; right?

24                   **MR. TOM MARAZZO:** Yes. I don't know who he  
25 delivered it to. I just recall the Governor General was a name  
26 that was thrown out there.

27                   **MR. BRENDAN van NIEJENHUIS:** Let's go to  
28 COM00000886, which is a copy of the memorandum, just for

1 clarity.

2                   **THE REGISTRAR:** Counsel, COM00000886 appears to  
3 be some sort of social media post.

4                   **MR. BRENDAN van NIEJENHUIS:** Excuse me, it's 866.  
5 I misspoke. And in fairness to you, Mr. Marazzo, you were clear  
6 in saying that this was, at the very least, not a well written  
7 document?

8                   **MR. TOM MARAZZO:** From what I remember reading  
9 it, I was -- I didn't believe it was a very well written  
10 document. I knew by looking at, it wasn't written by a lawyer.

11                   **MR. BRENDAN van NIEJENHUIS:** And if you look at  
12 the second page of the document, looking at the top here of the  
13 page, there's a list of the parties, in effect, to this  
14 Memorandum of Understanding. Do you see anything in there, the  
15 bold-faced lettering there at the top?

16                   **MR. TOM MARAZZO:** Yes.

17                   **MR. BRENDAN van NIEJENHUIS:** So one group is the  
18 concerned Canadian citizens, Indigenous community, and permanent  
19 residents ---

20                   **MR. TOM MARAZZO:** Yes.

21                   **MR. BRENDAN van NIEJENHUIS:** --- represented by  
22 the Bauders and Mr. Broadman?

23                   **MR. TOM MARAZZO:** Okay. Yes, yeah.

24                   **MR. BRENDAN van NIEJENHUIS:** And then the next  
25 party is the Senate, as ---

26                   **MR. TOM MARAZZO:** Yes.

27                   **MR. BRENDAN van NIEJENHUIS:** --- as represented  
28 by the speaker?

1           **MR. TOM MARAZZO:** Yes.

2           **MR. BRENDAN van NIEJENHUIS:** And then it's the  
3 governor general?

4           **MR. TOM MARAZZO:** Yes.

5           **MR. BRENDAN van NIEJENHUIS:** And if we go to page  
6 2 in article 3 -- stop there -- you see the notion here is that  
7 there would be a committee formed between the concerned citizens  
8 and the senate and the governor general, right?

9           **MR. TOM MARAZZO:** Yes.

10          **MR. BRENDAN van NIEJENHUIS:** And that that  
11 committee then would, under paragraph -- sub-paragraph (e)  
12 there, instruct all levels of the federal, provincial,  
13 territorial, and municipal governments to cease and desist, et  
14 cetera, et cetera, provisions related to COVID-19, right?

15          **MR. TOM MARAZZO:** Yes.

16          **MR. BRENDAN van NIEJENHUIS:** And if you go over  
17 to page 3 and look at item (j) there, you see that in exchange  
18 for this, the concerned citizens will immediately stop Operation  
19 BearHug Ottawa demonstration convoy. You see that?

20          **MR. TOM MARAZZO:** Yes.

21          **MR. BRENDAN van NIEJENHUIS:** And so in effect --  
22 and that was Mr. Bauder's name for the occupation and -- or  
23 blockades or what have you in Ottawa? It was Operation BearHug?

24          **MR. TOM MARAZZO:** I have no idea what he called  
25 it, and I don't know what Operation BearHug Ottawa is.

26          **MR. BRENDAN van NIEJENHUIS:** Okay. At any rate,  
27 you recognized that this document presented a something of a  
28 nonsensical idea?

1           **MR. TOM MARAZZO:** I would agree with that.

2           **MR. BRENDAN van NIEJENHUIS:** And you insisted  
3 that it be withdrawn and retracted publicly, and that -- and  
4 this was then done, right?

5           **MR. TOM MARAZZO:** That's my understanding.

6           **MR. BRENDAN van NIEJENHUIS:** And you understood  
7 that any legislative action would require the participation of  
8 the elected representatives at the federal, provincial, and  
9 municipal levels, right?

10          **MR. TOM MARAZZO:** Yes.

11          **MR. BRENDAN van NIEJENHUIS:** In fact, if you go  
12 to article 7 of the MOU -- excuse me, article 6 -- you'll see  
13 that it is, in fact, supposed to be construed in accordance with  
14 the laws of Canada, right?

15          **MR. TOM MARAZZO:** Yes.

16          **MR. BRENDAN van NIEJENHUIS:** Now, you can ---

17          **MR. TOM MARAZZO:** Can I just -- looking at this,  
18 this is a 15-page document. This is not, from my recollection,  
19 what I've read.

20          **MR. BRENDAN van NIEJENHUIS:** Okay.

21          **MR. TOM MARAZZO:** This is not what I read during  
22 my time in Ottawa. I believed it to be more of a two-part, two-  
23 page document. I don't recall ever looking at this particular  
24 document broken down like this.

25          **MR. BRENDAN van NIEJENHUIS:** Well, I'm sure you -  
26 --

27          **MR. TOM MARAZZO:** It was a media release of some  
28 kind they put out, but I don't remember ever reading this.

1                   **MR. BRENDAN van NIEJENHUIS:** Okay. Well, I'll  
2 ask Mr. Bauder about it tomorrow to see if there's a  
3 distinction.

4                   You indicated in your press conference on  
5 February 9th, as we just saw, that you were offering yourself as  
6 willing to sit down with the Conservative Party, the Bloc  
7 Quebecois, the NDP, and the governor general as a -- some sort  
8 of a representative, right?

9                   **MR. TOM MARAZZO:** Yeah. So in my -- I -- from my  
10 perspective, I was thinking not even more as a mediator. It was  
11 really just an SOS, to be honest with you. It was just a little  
12 call for help and inspiration, stop ignoring us, come and sit at  
13 a table. We've got a table. You guys -- you know, we'll get  
14 you a conference room, but just do something instead of taking  
15 cheap photo ops and opportunities with people and making this  
16 into a political joke for you guys. Get off your butts and come  
17 here and do something meaningful for the, you know, six million  
18 Canadians that are affected by this crap in this country right  
19 now.

20                   **MR. BRENDAN van NIEJENHUIS:** You had no interest  
21 in meeting with municipal elected officials, right?

22                   **MR. TOM MARAZZO:** No, because our issues were not  
23 with the municipal government. Our issue was with the federal  
24 government. We were here to end federal mandates.

25                   **MR. BRENDAN van NIEJENHUIS:** On February the  
26 13th, you had a meeting with Ottawa Police with respect to  
27 negotiations, right?

28                   **MR. TOM MARAZZO:** In what regard?

1                   **MR. BRENDAN van NIEJENHUIS:** You had a meeting in  
2 the evening with Supt. Drummond and ---

3                   **MR. TOM MARAZZO:** Yes.

4                   **MR. BRENDAN van NIEJENHUIS:** --- others from the  
5 Ottawa Police?

6                   **MR. TOM MARAZZO:** Yes. He just -- he was the  
7 only police officer in the room.

8                   **MR. BRENDAN van NIEJENHUIS:** Right. And you had  
9 commented that you wanted to have an inspector to deal with on  
10 behalf of Ottawa Police, right?

11                   **MR. TOM MARAZZO:** Yes.

12                   **MR. BRENDAN van NIEJENHUIS:** You understand that  
13 a superintendent is a rank above an inspector?

14                   **MR. TOM MARAZZO:** Yes.

15                   **MR. BRENDAN van NIEJENHUIS:** Can we go back to  
16 your affidavit, COM00000415, and it'll be page 4?

17                   Now, could we go to paragraph 17, I believe it  
18 is?

19                   You indicate here that:

20                   "The freezing of bank accounts in the  
21 wake of the invocation of the  
22 *Emergencies Act* has left me real  
23 concern that authorities are  
24 surveilling me and may arbitrarily  
25 charge and arrest me although I've  
26 committed no crime."

27                   Right?

28                   **MR. TOM MARAZZO:** Yes.



1                   **MR. BRENDAN van NIEJENHUIS:**

2                   "I'm constantly looking over my  
3                   shoulder. I am hesitant to leave my  
4                   house. I have left my home only twice  
5                   since I returned from Ottawa."

6                   **MR. TOM MARAZZO:** Yes.

7                   **MR. BRENDAN van NIEJENHUIS:** Right?

8                   "I am concerned about travelling with  
9                   my children, as I'm concerned they'll  
10                  be taken away from me by Children's Aid  
11                  in the even the police decide to charge  
12                  and arrest me."

13                  **MR. TOM MARAZZO:** Yes, because I was informed  
14                  after leaving Ottawa that there was a task force of RCMP, OPP,  
15                  Ottawa Police, as well as the statements publicly made by Acting  
16                  Chief Bell that said that you would be identified, investigated,  
17                  and there would be criminal charges and other punishments coming  
18                  your way.

19                  So that statement is true, because from my  
20                  perspective, I was one of the ones that was not charged during  
21                  the time in Ottawa, but I was led to believe that I was under  
22                  investigation and I have since learned different versions of  
23                  that. But it was my understanding that I was being investigated  
24                  as the 42 of us on the -- one of the lists were identified to  
25                  me.

26                  **MR. BRENDAN van NIEJENHUIS:** You've obviously  
27                  overcome this fear to be able to be with us today?

28                  **MR. TOM MARAZZO:** Well, I asked Keith Wilson a

1 few months ago when would I find out that I'm no longer being  
2 investigated, and when will I find out that I'm not going to be  
3 charged?

4 **MR. BRENDAN van NIEJENHUIS:** You had overcome  
5 this fear by May the 4th of 2022 when the election period began  
6 in the Ontario provincial election, fair?

7 **MR. TOM MARAZZO:** Yes, sir.

8 **MR. BRENDAN van NIEJENHUIS:** And that election  
9 was held on June the 2nd of 2022?

10 **MR. TOM MARAZZO:** Yes.

11 **MR. BRENDAN van NIEJENHUIS:** And you ran in the  
12 riding, I understand, of Peterborough Kawartha for the Ontario  
13 party?

14 **MR. TOM MARAZZO:** Yes.

15 **MR. BRENDAN van NIEJENHUIS:** And you there  
16 received 1,973 votes amounting to approximately 3.8 percent of  
17 the vote in the riding, right?

18 **MR. TOM MARAZZO:** Yes.

19 **MR. BRENDAN van NIEJENHUIS:** Could we go to  
20 PB.CAN.00001774?

21 I just want to put up a brief excerpt of the  
22 video. It'll be just at the very beginning.

23 **THE REGISTRAR:** Counsel, 1174 were the last four  
24 numbers that you just ---

25 **MR. BRENDAN van NIEJENHUIS:** One-seven-seven-four  
26 (1774). Yeah, I've done it again. Excuse me.

27 (VIDEO PLAYBACK)

28 **MR. BRENDAN van NIEJENHUIS:** Sir, how do you know

1 Mr. Mackenzie?

2 **MR. TOM MARAZZO:** He does -- he has a podcast and  
3 he does a lot of political satire and comedy. He does some  
4 serious videos sometimes. He is the creator of a fictitious  
5 meme on the internet known as Diagolon, which I assume what  
6 you're going to ask me about, and the vice-president of Diagolon  
7 being a time-travelling cocaine addicted goat.

8 That is just an internet meme that has no meaning  
9 at all, and I had spoken to Jeremy the first time when I was in  
10 Ottawa on the phone. And the second time I spoke to Jeremy was  
11 when the Liberal government was debating whether or not they  
12 should use the *Emergency Act*, and they were citing this  
13 fictitious goat that time travels as a domestic terrorist group  
14 and justification for invoking the Emergency Act.

15 And I saw a video that Jeremy and his friends  
16 were doing, and they were laughing hysterically, showing clips  
17 of the government actually talking about Diagolon as being a  
18 real thing.

19 Everybody knew it was a joke. When I saw the  
20 video I contacted Jeremy and I said, "Tell me everything there  
21 is to know about Diagolon."

22 He said, "If you draw a diagonal line from Alaska  
23 through Alberta to Texas it makes a diagonal line. And that's  
24 why it's called Diagolon. They're the only states and provinces  
25 that don't have mask mandates. And he used it as a joke. He  
26 made the symbol for Diagolon in a second on his cell phone  
27 because it's a joke. And it is meaningless. He did it to  
28 attract attention for people to come to a barbecue and to have a

1 lot of fun that were, you know, people wanted to have a barbecue  
2 without masks on, a bunch of strangers that didn't know each  
3 other.

4 And yet here he was, watching member of  
5 Parliament and the Liberal Party actually seriously stating that  
6 the reason for invoking the Emergency Act was because of  
7 Diagonon. Like, it was the most outrageous ridiculous thing I  
8 had ever seen.

9 And I think this Commission should be  
10 investigating that as the biggest Intelligence joke of the last  
11 decade.

12 So it's a joke. Diagonon is a joke. It's not  
13 even a real thing.

14 **MR. BRENDAN van NIEJENHUIS:** Thank you. Those  
15 are my questions. Thank you.

16 **COMMISSIONER ROULEAU:** Next is the Ottawa  
17 Residents Coalition.

18 **MR. PAUL CHAMP:** Good afternoon. My name is Paul  
19 Champ. I'm a lawyer for the Ottawa Coalition of Residents and  
20 Businesses.

21 **--- CROSS-EXAMINATION BY MR. PAUL CHAMP:**

22 **MR. PAUL CHAMP:** Just a couple of questions, Mr.  
23 Marazzo, following your testimony.

24 **MR. TOM MARAZZO:** Yes, sir.

25 **MR. PAUL CHAMP:** I note we didn't get an  
26 interview summary for you from the Commission counsel. Is that  
27 because you refused to sit down with Commission counsel for an  
28 interview?

1           **MR. TOM MARAZZO:** No. I believe my lawyers felt  
2 that I would not have my Charter rights protected if I  
3 voluntarily gave a statement.

4           **MR. PAUL CHAMP:** Okay. And then turning to your  
5 activities in Ottawa in February earlier this year, which hotel  
6 did you stay in again?

7           **MR. TOM MARAZZO:** The ARC.

8           **MR. PAUL CHAMP:** And who paid for your hotel?  
9 Mr. Bourgault, I gather?

10          **MR. TOM MARAZZO:** It's possible that he paid for  
11 it but I cannot confirm who paid for my hotel room. I just know  
12 I didn't.

13          **MR. PAUL CHAMP:** So you stayed in a hotel room  
14 for about three weeks and you don't know who paid for it?

15          **MR. TOM MARAZZO:** I do not know for a fact who  
16 paid for it. I spoke to Joseph's stepson, Ryan. But I don't  
17 know if he was paying for the rooms or he just had control of a  
18 block on behalf of somebody else. I don't really know because  
19 they belonged to some sort of an organization and I don't know  
20 if it was the organization or Joe or somebody specifically who  
21 did it. I just know that I went to Ryan when I needed a room.

22          **MR. PAUL CHAMP:** And we know through a variety of  
23 means that a significant amount of money was raised with respect  
24 to the convoy demonstration. Did you have some of your expenses  
25 covered, aside from the hotel?

26          **MR. TOM MARAZZO:** There was occasions where I was  
27 buying my own food. And whatever food was donated in the  
28 conference room that we had -- like I said, I was sick So I

1 ended up losing 14 pounds and I've gained more than that back.  
2 And I wasn't eating very much, The few times I ate I actually  
3 bought myself if I wanted more of a meal.

4 **MR. PAUL CHAMP:** So you didn't get any cash to  
5 cover any of your travel expenses or anything like that?

6 **MR. TOM MARAZZO:** No, sir. No.

7 **MR. PAUL CHAMP:** Now, you've told us that you  
8 were doing logistics for the convoy but it's a little bit  
9 unclear to me exactly what you were doing. You were managing  
10 truck locations?

11 **MR. TOM MARAZZO:** Yes.

12 **MR. PAUL CHAMP:** Anything else?

13 **MR. TOM MARAZZO:** Well, when I initially got  
14 there I was focused in on the logistics. And then after the  
15 raid at Coventry I had notified a former military officer that I  
16 personally knew and I asked him if he would come to Ottawa and  
17 help me. And he did. And so I was able to actually hand off  
18 some of those day to day things that I was working on and then  
19 move towards -- so my role actually did transition less day to  
20 day logistics, more strategically working with Keith and Eva to  
21 get this -- get something going here.

22 **MR. PAUL CHAMP:** Right. And I heard you talking  
23 about the transition but it was unclear to me what you  
24 transitioned from. What logistics were you doing?

25 **MR. TOM MARAZZO:** Well, I really was directing  
26 the people on the ground, you know, figuring -- like, basically  
27 steering people in the direction of things that they needed to  
28 focus on -- truck locations. There was occasions where we

1 wanted to -- people wanted to move trucks around.

2 **MR. PAUL CHAMP:** Right.

3 **MR. TOM MARAZZO:** But that became a little bit  
4 difficult as well. And then oftentimes I would deal directly  
5 with the police so that became something that was impacting my  
6 day greatly. I would have conversations with the liaison  
7 sergeants and then go back and talk to the truckers. So  
8 physically was I out there filling trucks up? No, I wasn't.  
9 But I was trying to facilitate, you know, organizing that  
10 better, developing trucker captain organizations and stuff like  
11 that, only to find that really the truckers were organically  
12 doing that themselves.

13 **MR. PAUL CHAMP:** And you told us that you were  
14 trying to manage where the trucks were, figure out where they  
15 all were and map them out, how many trucks, and try to get an  
16 accurate count and so forth.

17 **MR. TOM MARAZZO:** Yes.

18 **MR. PAUL CHAMP:** But it was put to you by  
19 Commission counsel about Kent Street. Now, we've heard police  
20 evidence, evidence from a resident and actually Chris Barber  
21 himself testify that Kent Street was almost completely blocked  
22 throughout the entire convoy. Every once in a while the  
23 emergency would get it open but it would almost instantly be  
24 closed up again. And predominantly there was no emergency lane  
25 on that street.

26 So I'm surprised, Mr. Marazzo, you don't remember  
27 that one street.

28 **MR. TOM MARAZZO:** Well, that's ---

1                   **MR. PAUL CHAMP:** Why is that?

2                   **MR. TOM MARAZZO:** At some point I had the two  
3 people that I was working with that actually started to monitor  
4 that -- my friend that I just mentioned, that was retired  
5 military as well as one other individual. And every time that  
6 the -- the other issue was this that we recognized was that the  
7 police liaison teams were going and talking to everybody. So  
8 they would talk to me, leave, and go have the same exact  
9 conversation with somebody else. And there was multiple teams  
10 and the information was getting very confusing.

11                   So for example, they would talk to me and if you  
12 were there they would go over and talk to you and say the same  
13 thing. And then everybody is chasing their tail going in  
14 circles. So at some point we just kind of -- people took on  
15 responsibilities for certain functions and they just would  
16 maintain that. And so the two individuals I'm speaking about,  
17 when it came to safety, the police would go to them for safety  
18 lanes. They would immediately go out and do the best they could  
19 to clear it. But then again, sometimes they got blocked.

20                   **MR. PAUL CHAMP:** That's helpful. I must have  
21 misunderstood your evidence. I thought that's what you were  
22 doing.

23                   You would agree with me, Mr. Marazzo, city buses  
24 -- there's no way they could get through anywhere downtown,  
25 correct? That's an easy one.

26                   **MR. TOM MARAZZO:** I would say -- because I  
27 believe if I was on Metcalfe is what the ARC was on. I believe  
28 they could have got through there. I don't see any reason why



1 not. There was days I went out there and the street was wide  
2 open.

3 **MR. PAUL CHAMP:** A bus could have gone up and  
4 down Metcalfe all day long, back and forth, I guess?

5 **MR. TOM MARAZZO:** Yes. Well, I don't want to say  
6 "all day long" but I mean, there were several times where, you  
7 know, it was wide open. I moved my vehicle right in front of  
8 the ARC Hotel on that street and no problems.

9 **MR. PAUL CHAMP:** But presumably if people wanted  
10 to go anywhere other than up and down Metcalfe they wouldn't be  
11 able to access the city bus.

12 **MR. TOM MARAZZO:** As you got closer to  
13 Wellington, it became increasingly more difficult.

14 **MR. PAUL CHAMP:** Similarly and particularly,  
15 individuals who require Para Transpo buses, they weren't getting  
16 anywhere through downtown, correct?

17 **MR. TOM MARAZZO:** Do you mean the shorter buses  
18 that are meant for wheelchairs?

19 **MR. PAUL CHAMP:** That's correct.

20 **MR. TOM MARAZZO:** I don't think that that's  
21 entirely accurate. I think again -- I would say that for that  
22 type of transportation as you got a little closer to Wellington  
23 it would probably be more of a challenge. But it would be up to  
24 the individual bus driver himself or herself to see if they  
25 could negotiate through those intersections.

26 **MR. PAUL CHAMP:** You didn't observe any though?

27 **MR. TOM MARAZZO:** No, I did not.

28 **MR. PAUL CHAMP:** And just moving to a different

1 topic, police leaks -- you were getting information about what  
2 the police were planning ahead of time through sympathetic  
3 police officers; is that right?

4 **MR. TOM MARAZZO:** That's my understanding but  
5 they were coming to me directly. They were coming from other  
6 sources and then I would have conversations with people that had  
7 -- that information was passed to them.

8 **MR. PAUL CHAMP:** So you were kind of like the  
9 clearing house for the intelligence, I guess, for the convoy?

10 **MR. TOM MARAZZO:** No. I tried to decentralize  
11 that as well in the sense that you could -- you know, I wasn't a  
12 police officer. I had worked a lot with police officers in my  
13 military career but I wasn't a police officer. So we had police  
14 officers that were retired that -- you know, everybody knows  
15 Danny Bulford was one.

16 If I had questions, you know, maybe him or Vince  
17 Gircys maybe. But at that point -- at some point I stopped  
18 actually caring about certain things, and I just left it into  
19 other people's more expertise or more capable hands.

20 **MR. PAUL CHAMP:** Moving on to another topic, you  
21 testified about the slow roll ---

22 **MR. TOM MARAZZO:** Yes.

23 **MR. PAUL CHAMP:** --- Pat King's slow roll around  
24 the airport, and that you cooperated, to some extent, assisting  
25 with that; correct?

26 **MR. TOM MARAZZO:** Just so much as I wanted to  
27 make sure that there would never be a complete blockage or  
28 stoppage of operations for the airport.

1                   **MR. PAUL CHAMP:** And but you also told us there  
2 was some value to it as well.

3                   **MR. TOM MARAZZO:** Yes.

4                   **MR. PAUL CHAMP:** That it was sending a message to  
5 the City that the vehicles could move around and could move to  
6 other areas of the city ---

7                   **MR. TOM MARAZZO:** Yes.

8                   **MR. PAUL CHAMP:** --- if necessary?

9                   **MR. TOM MARAZZO:** Yes. And that discussion  
10 centred around what happened at Coventry when the police went in  
11 on the Sunday night ---

12                   **MR. PAUL CHAMP:** Right.

13                   **MR. TOM MARAZZO:** --- and raided and stole the  
14 fuel and stole the food. And my conversations with the Ottawa  
15 Police the next day was, you know, if you want to provoke a  
16 reaction from this organic movement, from individual truckers,  
17 that's the best way to go about it, and if you want to keep it  
18 as civil as it has been, don't get it -- don't put us in a  
19 situation where there has to be a tit-for-tat kind of a  
20 situation. And I said, "And by the way, we will never exceed  
21 the level of stupidity that you guys are doing to us. We might  
22 match it, but we'll never exceed it. And by the way, your  
23 Coventry was your freebie. We're not -- you know, we're not  
24 going to do anything because of what you did at Coventry because  
25 we don't see the value in it. We don't want to escalate this  
26 into something terrible."

27                   And so we just tried to always keep the  
28 temperature down, keep the tone down with them, but, you know,

1 they were incredibly provoking constantly.

2 **MR. PAUL CHAMP:** So the slow roll was a warning  
3 to the City that if the police did some kind of enforcement  
4 action, the truckers might retaliate in some way?

5 **MR. TOM MARAZZO:** I don't -- you know, I'm not  
6 comfortable with the word retaliate, but, you know, you could  
7 split hairs on that word, but it wasn't meant as a retaliation.  
8 It was meant really to send the signal that, you know, we've got  
9 the ability to move around, and do we want to escalate to that  
10 level? No. What we're trying to say to you is that if we  
11 really, really want to escalate to the level you guys are  
12 ramping up, then we can play that game with you, but we don't  
13 want to play that game. So they'll do the slow roll just to let  
14 you know that it is possible.

15 **MR. PAUL CHAMP:** And just to be clear what we're  
16 talking about here, the game meaning the police enforcing the  
17 law. If the police attempt to enforce the law, the truckers,  
18 given their size and their numbers, will escalate towards the  
19 City of Ottawa and the residents; correct? That's what you  
20 mean?

21 **MR. TOM MARAZZO:** I don't really -- I didn't see  
22 it lawful to go in and steal people's fuel or their food. I  
23 didn't actually see it as a lawful act on behalf of the police.

24 **MR. PAUL CHAMP:** Now ---

25 **MR. TOM MARAZZO:** I saw it as theft.

26 **MR. PAUL CHAMP:** --- with respect to Mr. King,  
27 Mr. King you understood, people didn't want to deal with him  
28 because some of his comments online about bullets and so forth

1 were distasteful; is that right?

2 **MR. TOM MARAZZO:** Yeah, that was the sense I got,  
3 but I knew -- somebody had also told me, those comments were  
4 like for two years prior to the convoy and it was just a  
5 complete headpiece by somebody, whoever put that video out  
6 there. That it was just meant to discredit him and make us look  
7 bad. And it was a video ---

8 **MR. PAUL CHAMP:** You don't think Mr. King was  
9 discrediting himself by saying the Prime Minister's going to  
10 catch a bullet?

11 **MR. TOM MARAZZO:** From the testimony I saw here  
12 in the room the other day, the context of that had something to  
13 do with something completely unrelated to this convoy.

14 **MR. PAUL CHAMP:** What about his online comments  
15 about race and the Anglo-Saxon race, were those kinds of  
16 comments discrediting the movement?

17 **MR. TOM MARAZZO:** I know nothing of those  
18 comments.

19 **MR. PAUL CHAMP:** Or Mr. Barber, his online racist  
20 comments, was that discrediting the movement?

21 **MR. TOM MARAZZO:** I believe he owned up to that  
22 himself yesterday.

23 **MR. PAUL CHAMP:** Right. And then finally,  
24 Diagonlon, you said that this was a joke, and it was about  
25 creating a diagonal state of people who don't wear masks. Isn't  
26 it, in fact, the case that the concept for the images of the  
27 diagonal state where there would only be white people who would  
28 live in it, and they could get all non-white people out;

1 correct?

2 **MR. TOM MARAZZO:** All right. So ---

3 **COMMISSIONER ROULEAU:** Hey, please.

4 **MR. TOM MARAZZO:** --- the ---

5 **COMMISSIONER ROULEAU:** Just wait a moment,  
6 please.

7 Let's try and keep it quiet, please, while we  
8 hear the evidence. This is the equivalent of a court in the  
9 sense that we have sworn evidence and we'd like to keep a proper  
10 atmosphere.

11 Go ahead. I'm sorry. Go ahead.

12 **MR. TOM MARAZZO:** If you were to meet some of  
13 Jeremy MacKenzie's friends and the ones that were on the video  
14 that I was describing earlier where they were laughing about the  
15 Liberal Party using Diagonon as a justification, you'll see  
16 clearly that one of Jeremy's best friends is a black man.  
17 There's -- I don't -- I can't even comment on how somebody ---

18 **MR. PAUL CHAMP:** Does he have a Jewish accountant  
19 as well?

20 **MR. TOM MARAZZO:** Sorry?

21 **MR. PAUL CHAMP:** Does he have a Jewish accountant  
22 as well?

23 **MR. TOM MARAZZO:** I ---

24 **MR. PAUL CHAMP:** Sir ---

25 **MR. TOM MARAZZO:** --- don't even know what that  
26 means.

27 **MR. PAUL CHAMP:** --- have you looked at Mr.  
28 MacKenzie's online rants? You've seen them? Do you find -- do

1 you think that ---

2 **MR. TOM MARAZZO:** I've seen some of his rants and  
3 some of them -- you know, some of the things he says I don't  
4 agree with and some of the ---

5 **MR. PAUL CHAMP:** Right.

6 **MR. TOM MARAZZO:** --- things I think he's  
7 absolutely spot on, but that's up to me to make a decision on  
8 whether or not I find that the content is appropriate or not.  
9 And I have seen Jeremy say things I don't like, and I've seen  
10 Jeremy say things that I thought were brilliant.

11 **MR. PAUL CHAMP:** Thank you.

12 **COMMISSIONER ROULEAU:** Okay. Next call on the  
13 Ontario Provincial Police.

14 **MR. CHRISTOPHER DIANA:** Apologies for the delay.  
15 I have no questions. Thank you.

16 Sorry, I wasn't plugged in. I apologize for the  
17 delay. I have no questions.

18 **COMMISSIONER ROULEAU:** Okay. Next is Counsel for  
19 former Chief Sloly.

20 **MS. JESSICA BARROW:** I'm sorry for interrupting,  
21 Mr. Commissioner, but you may have missed Ottawa Police on the  
22 list.

23 **COMMISSIONER ROULEAU:** Yes, I did. But we'll get  
24 back to you after; okay?

25 **MS. JESSICA BARROW:** Sure.

26 **COMMISSIONER ROULEAU:** Former Chief Sloly?

27 **MR. TOM CURRY:** Commissioner, I believe my  
28 friends from the Ottawa Police Service have more time than have

1 I and probably make sense for them to go ahead, if they're  
2 prepared to, if it's your ---

3 **COMMISSIONER ROULEAU:** That's fine. I will  
4 concede to counsel's agreement.

5 Okay. Ottawa Police Service.

6 **--- CROSS-EXAMINATION BY MS. JESSICA BARROW:**

7 **MS. JESSICA BARROW:** Good afternoon. My name is  
8 Jessica Barrow, and as you've now heard, I am counsel for the  
9 Ottawa Police Service.

10 **MR. TOM MARAZZO:** Yes.

11 **MS. JESSICA BARROW:** I just have a couple of  
12 questions, and I wonder if we can start with the document  
13 OPS14504. Have you seen this document before?

14 **MR. TOM MARAZZO:** I'm not entirely sure.

15 **MS. JESSICA BARROW:** If you read through it, and  
16 obviously we can give you a minute, it's a document that was --  
17 we've heard was circulated to the protesters and it's dated  
18 February 17<sup>th</sup>. It was circulated by the Ottawa Police Service.

19 **MR. TOM MARAZZO:** Okay. I'm -- my recollection,  
20 I know there was a letter that was posted all over the city. I  
21 honestly never bothered to read it. I know there was something  
22 that was posted places, and I know there was two different  
23 coloured ones, but that's the extent of my knowledge of the  
24 documents.

25 **MS. JESSICA BARROW:** So you testified earlier  
26 that perhaps there was a lack of clarity around whether you  
27 could be in the red zone on foot at this point, but that it was  
28 your -- it was your understanding that you could not be there



1 with a vehicle; is that correct? Do I have that correct?

2 **MR. TOM MARAZZO:** Well, what I meant, like, as in  
3 you weren't going to be able to bring in a large truck. I  
4 wasn't really thinking about it in terms of individual vehicles.  
5 I know my vehicle was there and I got 5 parking tickets in 24  
6 hours and my car hadn't even moved. So I knew there was an  
7 issue with vehicles, but I -- my mind at the time was focussed  
8 on people that wanted to come to the city came in on foot.

9 **MS. JESSICA BARROW:** Okay. Well, let's take a  
10 look at this document then. If we could scroll to the top a  
11 little bit? It says we want to inform you that,

12 "You will face severe penalties under  
13 provincial and federal legislation if  
14 you do not cease further unlawful  
15 activity and remove your vehicle and  
16 your property immediately from all  
17 unlawful protest sites."

18 And then if we scroll down a little, it says you  
19 may be arrested, your vehicle could be seized, a few other  
20 issues. Those delivering -- you can see at the bottom,

21 "Those delivering fuel and other  
22 supplies can be charged. Persons  
23 travelling to the unlawful protest  
24 sites to participate or support the  
25 unlawful demonstration can be charged."

26 So does that perhaps clarify the question of  
27 whether you could be there at this point in time on February  
28 17<sup>th</sup>?

1           **MR. TOM MARAZZO:** Well, that's based on, you  
2 know, a document that was posted around the city that was not  
3 actually served to me personal, so I didn't look at it. I can't  
4 really explain why I couldn't -- I didn't look at it, but you're  
5 posting that, but I'm getting -- I was getting different  
6 interpretation from the lawyers that were accompanying us.

7           **MS. JESSICA BARROW:** Right. So you're getting an  
8 interpretation from your lawyer ---

9           **MR. TOM MARAZZO:** Yes. And the interpretation  
10 from you.

11           **MS. JESSICA BARROW:** --- that the Ottawa Police  
12 are circulating information that you're choosing not to read  
13 that is telling you, that if you continue to stay here, you may  
14 get arrested; is that fair?

15           **MR. TOM MARAZZO:** I vaguely even recall ever  
16 seeing it. Like I might have seen something posted in an  
17 elevator once; that's all I even remember noticing that there  
18 was something there and I -- but honestly, until the violence  
19 came to the protestors from the police, I didn't see this as  
20 something that we -- I didn't see it as something that needed to  
21 be abided by because it was a peaceful protest and I knew that  
22 Justice McLean had already ruled that we had a right to be  
23 there. Whether or not the *Emergency Act* was invoked, you know,  
24 we're getting conflicting information from the Police, we're  
25 getting -- we have information that I trust a lot more from our  
26 legal team, because we were dealing with pro bono lawyers; there  
27 was five of them that did criminal law and we had the two  
28 lawyers that were on the ground with us the entire time.

1           So we were there to do a protest and we took the  
2 Judge's -- I personally took the Judge's word as well as Keith  
3 and Eva's word, that what we were doing was lawful. And so  
4 that's how I conducted myself, according to that.

5           **MS. JESSICA BARROW:** So I respect the fact that  
6 you may have been operating on legal advice, but I guess my  
7 question to you is, it wasn't a question of there being a lack  
8 of clarity from the Ottawa Police Service, and in fact it was  
9 just that you disagreed with the direction of the Ottawa Police  
10 Service?

11           **MR. TOM MARAZZO:** At the time I wasn't really  
12 considering that as direction because at no time did the police  
13 actually come up to me and say that in no uncertain terms. It  
14 was something that was stuck to the wall on a piece of paper.  
15 So when it's stuck to the wall and not handed to me, it didn't  
16 really seem overly credible. And I don't want to say credible,  
17 but if it was so important to them I would have thought that any  
18 one of those police liaison officers would have walked up and  
19 handed it to me and explained it to me, either a puppet show or  
20 a box of crayons so that I could understand it, but that was  
21 never the case. It was just posted on a wall.

22           **MS. JESSICA BARROW:** Were you aware that there  
23 was also social media posts in relation to these warnings?

24           **MR. TOM MARAZZO:** No.

25           **MS. JESSICA BARROW:** Were you monitoring the  
26 Ottawa Police Service's social media?

27           **MR. TOM MARAZZO:** I was not; I was not.

28           **MS. JESSICA BARROW:** Okay. You indicated -- you

1 referred to police violence ---

2 **MR. TOM MARAZZO:** Yes.

3 **MS. JESSICA BARROW:** --- starting on the -- I  
4 presume on the 18<sup>th</sup> of February; correct?

5 **MR. TOM MARAZZO:** Yes.

6 **MS. JESSICA BARROW:** And you indicated that you  
7 were watching that from your hotel room?

8 **MR. TOM MARAZZO:** No, I was there -- I was only  
9 15 feet away from the horses when they trampled the two people.

10 **MS. JESSICA BARROW:** So then you would have heard  
11 prior to the arrest taking place multiple verbal warnings from  
12 police officers indicating that if people didn't depart, they  
13 risked being arrested; is that ---

14 **MR. TOM MARAZZO:** No, I did not hear them  
15 verbally. The front line of police officers were extremely  
16 quiet. The front row of protestors were trying to engage the  
17 police in dialogue and to convince them to stop doing what they  
18 were doing. And there was no reaction from the police on the  
19 front line. There's no shouts; there was no -- I didn't hear  
20 even so much as a bullhorn telling the crowd to disperse during  
21 the time that I was there on the line, from what I had  
22 personally observed.

23 **MS. JESSICA BARROW:** And so if there's evidence  
24 to suggest that there were sort of loud speakers or whatever  
25 we're calling them, indicating that people needed to leave or  
26 they could be arrested; you just didn't hear that?

27 **MR. TOM MARAZZO:** I did not hear that personally;  
28 if that's what was done, I did not personally hear that.

1                   **MS. JESSICA BARROW:** And notwithstanding that the  
2 police were obviously present and ready to arrest because they  
3 weren't leaving, they weren't leaving, correct?

4                   **MR. TOM MARAZZO:** They were not leaving.

5                   **MS. JESSICA BARROW:** Okay. Thank you. Those are  
6 my questions.

7                   **COMMISSIONER ROULEAU:** Now, former Chief Sloly's  
8 counsel, please.

9                   **--- CROSS-EXAMINATION BY MR. TOM CURRY:**

10                   Mr. Marazzo, Tom Curry for former Chief Sloly.  
11 Just on the point that my friend Ms. Barrow was asking you  
12 about, can you just help us. I thought I saw in the statement  
13 -- and we don't have to go back to it -- but just tell me if  
14 I've got this right. That you encouraged the protestors towards  
15 the end as this enforcement action rolled out, you encouraged  
16 protestors to leave the protest site rather than be arrested?

17                   **MR. TOM MARAZZO:** I don't believe that to be the  
18 case. I never encouraged anyone to leave until the 19<sup>th</sup>.

19                   **MR. TOM CURRY:** On the 19<sup>th</sup>, maybe I had that  
20 date wrong then.

21                   **MR. TOM MARAZZO:** Yes.

22                   **MR. TOM CURRY:** So beginning on the 19<sup>th</sup> ---

23                   **MR. TOM MARAZZO:** Yes.

24                   **MR. TOM CURRY:** --- did you then change your  
25 approach and encourage protestors to leave rather than be  
26 arrested?

27                   **MR. TOM MARAZZO:** After what I saw personally on  
28 the City, the level of violence that the police had brought to

1 the protestors, what I saw, I was so disgusted. That day Danny  
2 Bulford had also been arrested later in the afternoon. And the  
3 following morning on the 19<sup>th</sup> I had a meeting with the remaining  
4 people that I knew to be leaders or truck captains in my hotel  
5 room with other people and we -- my advice to everybody was to  
6 depart the City of Ottawa and to peacefully withdraw, but that  
7 would be -- it would have to be up to the individual  
8 owner/operators of their own vehicles. They have to decide for  
9 themselves, but our recommendation was that they left the City  
10 of Ottawa as peacefully as they could, and I -- at 10:03 in the  
11 morning I remember the phone call; I notified them and I said  
12 "We will peacefully withdraw; you need to move your concrete  
13 barriers and allow us to get fuel into the trucks and we will  
14 start making arrangements to leave as soon as possible", but  
15 that each truck driver had to make their own individual  
16 decision. And, you know, there is a video of it I'm sure of me  
17 bringing it up, and you know, it was a very frustrating phone  
18 call that I had with the OPP, but I said we would recommend it.  
19 It's not my proudest moment if you do show the video; my  
20 language is terrible, but I was angry and I was frustrated, but  
21 I advised him to allow the truckers to leave. Move the concrete  
22 barriers because we couldn't get out and allow us to get fuel  
23 because, you know, fuel was a bit of an issue trying to get out.

24 **MR. TOM CURRY:** Right. And for the  
25 Commissioner's purposes then, do you know how many of the  
26 protestors took the advice that you gave and left voluntarily?

27 **MR. TOM MARAZZO:** There was a group of protestors  
28 that were set up with tents; there was a -- it was an outdoor

1 kitchen basically with a big pig roast and stuff and that  
2 individual who was -- I think owned that tent or was in control  
3 of that tent, had started to pack up and recommend to his people  
4 that it was time to leave. And I just know that various groups  
5 took the advice and some didn't. But by the morning of the 19<sup>th</sup>,  
6 from our perspective, the violence just actually got worse. And  
7 when they moved down to the War Memorial, that's when things got  
8 really quite disturbing about -- and even on the 18<sup>th</sup> things were  
9 incredibly disturbing. You know, you'll hear testimony here I'm  
10 sure from Chris Deering, the horrific things that he had, and  
11 he's a combat veteran of Afghanistan.

12                   So after hearing that, and seeing the footage of  
13 all of that stuff, after that, there was no way there was any  
14 point in staying any longer. I mean I understand violence.  
15 There was no way those truckers were ever going to be able to  
16 repel the police, in any way.

17                   **MR. TOM CURRY:** The truckers who -- those who  
18 remained?

19                   **MR. TOM MARAZZO:** Those who remained and those  
20 who didn't -- were not allowed to get out because I think at  
21 that point in the 18<sup>th</sup> and 19<sup>th</sup> the police decided they're going  
22 in and -- you know, we had seen the text messages of RCMP  
23 officers laughing and joking about bringing - like don't do it  
24 all in one day, let us get our turn on the next day. The police  
25 were getting geared up; that was leaked to the alternative  
26 social media where they were joking and laughing about using  
27 jackboots on people.

28                   **MR. TOM CURRY:** Right. So just a couple of

1 things then; you told the Commissioner that you were watching  
2 the interaction between the Police Services Board Chair ---

3 **MR. TOM MARAZZO:** Yes.

4 **MR. TOM CURRY:** --- and Chief Sloly?

5 **MR. TOM MARAZZO:** Yes.

6 **MR. TOM CURRY:** And did you form the conclusion  
7 that Chief Sloly's support from the Police Services Board was --  
8 had been badly effected, diminished?

9 **MR. TOM MARAZZO:** No, it was my understanding  
10 that it is against the law for a Police Services Board to direct  
11 police operations and from my perspective, what I was watching,  
12 was her covert or very -- I don't know what the word is, but  
13 Diane Dean's deep desire to start directing police operations to  
14 Chief Sloly. And when I listened to his response, I had to  
15 listen to it twice to understand what really was going on in  
16 that meeting. It was very clear to me that he was getting  
17 pressure from every different direction, especially because --  
18 Diane Dean effectively was his boss and she was putting an  
19 enormous amount of pressure on him and combining that with all  
20 the other rhetoric from the mayor and the other politicians  
21 locally, it was my opinion that if we didn't do something to  
22 help him, to take the pressure off of him specifically, there  
23 would be a very negative reaction from the entire Police Service  
24 of Ottawa.

25 **MR. TOM CURRY:** And you were attempting also, as  
26 I understand it, to take pressure off the -- from the residents.

27 **MR. TOM MARAZZO:** Yeah. And that was the  
28 strategy, was to take the pressure off the residents and thereby



1 get less complaints to the police. And then if the politicians  
2 were getting less pressure, they would put less pressure on the  
3 Chief.

4 **MR. TOM CURRY:** You arrive -- you were there from  
5 the 30<sup>th</sup> on. Do I have it right that you understood,  
6 particularly having regard to your background in our armed  
7 forces, that the Ottawa Police Service, as a police service of  
8 local jurisdiction, did not have sufficient resources to manage  
9 and disperse the protesters on 30<sup>th</sup>, February 1<sup>st</sup>, whatever day  
10 you choose; is that -- was that a fair conclusion that you drew?

11 **MR. TOM MARAZZO:** At that point it was far too  
12 early to tell because I knew that there was -- Parliamentary  
13 police were local, were here. I knew that there was -- Gatineau  
14 Police were close by; I knew OPP was in the area, and I knew  
15 there was probably RCMP in the area. But it was our -- or my  
16 belief, because I knew that the liaison teams were interacting  
17 with us, at least, that we had an exceptionally good chance to  
18 work with the police. This is why we made a concerted effort to  
19 constantly work with the police because we knew that, you know,  
20 we had a measure of power, in terms of the convoy itself. But  
21 they actually have the force, the physical force, to change the  
22 situation. And so we thought if we could just keep the  
23 temperature down constantly and effectively with the police,  
24 there wouldn't be a need to bring in other police departments.

25 **MR. TOM CURRY:** Okay.

26 One last thing, and please, can I ask to show the  
27 witness HRF1379.

28 This is a short little statement that I think

1 that you gave, I just want to make sure that I have you confirm  
2 it.

3 This goes, I think, to your ability to manage  
4 some of the protesters. Other witnesses have told us about  
5 their -- the nature of the independent thinking, independent  
6 operator; you've experienced that too.

7 **MR. TOM MARAZZO:** Yes.

8 **MR. TOM CURRY:** Page 5, please. Just a little  
9 higher, perhaps it starts on 4. A little higher, please.  
10 You're just a -- I'm sorry; a little lower. There it is.

11 "During the meeting..." -- do you see that?

12 **MR. TOM MARAZZO:** Yes.

13 **MR. TOM CURRY:** "During the meeting Marazzo and  
14 Wilson said they would try to move  
15 trucks from residential areas downtown  
16 and clear the Rideau and Sussex  
17 intersection; police agreed to move  
18 their concrete barriers temporarily so  
19 the trucks could get onto Wellington  
20 St. The caveat, however, which Wilson  
21 and Marazzo knew all too well, was that  
22 no one could force the truckers to do  
23 anything they didn't want to do."

24 **MR. TOM MARAZZO:** Yes.

25 **MR. TOM CURRY:** That remained true throughout?

26 **MR. TOM MARAZZO:** Yes.

27 **MR. TOM CURRY:** Okay. Thank you.

28 I don't have any other questions for you.

1 Thank you, Commissioner.

2 **COMMISSIONER ROULEAU:** Okay. Thank you.

3 Next is the City of Ottawa.

4 **MS. ALYSSA TOMKINS:** All of the areas upon which  
5 we had intended to question have been canvassed.

6 Thank you, Commissioner.

7 **COMMISSIONER ROULEAU:** Okay.

8 CCLA please.

9 **MS. EWA KRAJEWSKA:** Yes. Thank you,  
10 Commissioner.

11 **--- CROSS-EXAMINATION BY MS. EWA KRAJEWSKA:**

12 **MS. EWA KRAJEWSKA:** Mr. Marazzo, my name is Ewa  
13 Krajewska, and I'm counsel for the Canadian Civil Liberties  
14 Association. I want to ask you a few questions with respect to  
15 the Emergencies Orders.

16 After the Emergencies -- the Federal *Emergencies*  
17 Act was invoked, were any of your personal or corporate bank  
18 accounts frozen?

19 **MR. TOM MARAZZO:** Yes. All of my bank accounts,  
20 my joint bank accounts with my former spouse, were all affected.  
21 My credit card that was on file with my son's pharmacy were  
22 suspended. My former spouse, her credit rating was dropped 109  
23 points. Yes, so everything was frozen; I had access to no money  
24 other than cash.

25 **MS. EWA KRAJEWSKA:** And so these were all your  
26 personal accounts, and not just ones that you hold individually,  
27 but also ones that you hold jointly with your ---

28 **MR. TOM MARAZZO:** Yes.

1                   **MS. EWA KRAJEWSKA:** --- child and your former  
2 spouse?

3                   **MR. TOM MARAZZO:** Yes. They were joint -- joint  
4 accounts were frozen, as well as my ex-wife's -- my first wife's  
5 financial institution reached out and cautioned her that  
6 potentially her accounts were going to also be frozen; and I  
7 haven't been with her in over a decade.

8                   **MS. EWA KRAJEWSKA:** And Mr. Marazzo, how long  
9 were your bank accounts frozen?

10                  **MR. TOM MARAZZO:** During the entire time of the  
11 *Emergency Act*.

12                  **MS. EWA KRAJEWSKA:** So until the *Emergencies Act*  
13 was revoked?

14                  **MR. TOM MARAZZO:** Yes.

15                  **MS. EWA KRAJEWSKA:** And ---

16                  **MR. TOM MARAZZO:** My -- sorry; go ahead,

17                  **MS. EWA KRAJEWSKA:** Sorry; go ahead. No, no, go  
18 ahead.

19                  **MR. TOM MARAZZO:** I was just going to say that  
20 luckily we had cash in the house because my son's heart  
21 medication, we couldn't purchase it; my account had been frozen.  
22 And if we didn't have cash, he wouldn't have been able to get  
23 his heart medication. He had -- a month and half previous had  
24 myocarditis and was on some pretty intense heart medication.

25                  **MS. EWA KRAJEWSKA:** And were you given any  
26 information, either from the bank or from the police, as to how  
27 you -- how your bank accounts could be reopened?

28                  **MR. TOM MARAZZO:** I was never notified that my

1 bank accounts had been frozen. And I was never notified that  
2 they would be, and I was never notified that they were  
3 reinstated, at no time.

4 **MS. EWA KRAJEWSKA:** So so did you find out they  
5 were frozen because you could no longer use your ---

6 **MR. TOM MARAZZO:** Could no longer ---

7 **MS. EWA KRAJEWSKA:** --- cards?

8 **MR. TOM MARAZZO:** Could no longer access any of  
9 our financial assets at all.

10 **MS. EWA KRAJEWSKA:** And were you -- and how did  
11 you find out that your bank accounts and assets were unfrozen;  
12 was it just because you were able to use them again?

13 **MR. TOM MARAZZO:** We just continued -- once we  
14 discovered it, we would check every couple of hours to see if we  
15 had access to our own money.

16 **MS. EWA KRAJEWSKA:** Were you able to access your  
17 online banking?

18 **MR. TOM MARAZZO:** Just to get in -- you could log  
19 in but it -- there was a message on it that said access to your  
20 financial whatever was denied.

21 **MS. EWA KRAJEWSKA:** Okay. Thank you very much  
22 Mr. Marazzo. Thank you.

23 Thank you, Commissioner.

24 **COMMISSIONER ROULEAU:** Thank you.

25 Next is Democracy Fund/JCCF.

26 **MR. ANTOINE D'AILLY:** Commissioner.

27 **--- CROSS-EXAMINATION BY MR. ANTOINE D'AILLY:**

28 **MR. ANTOINE D'AILLY:** Mr. Marazzo, I'll be very

1 brief today.

2                   You indicated at the beginning of your testimony

3 ---

4                   **COMMISSIONER ROULEAU:** Just a minute.

5                   **MR. ANTOINE D'AILLY:** Sorry; my name's Antoine  
6 D'Ailly, counsel to Citizens for Freedom.

7                   You indicated near the beginning of your  
8 testimony today that you saw things you'd never thought you  
9 would see in Canada, and that those things may have formed part  
10 of your motivation for your participation in the convoy.

11                   **MR. TOM MARAZZO:** Yes.

12                   **MR. ANTOINE D'AILLY:** Is that a reference to  
13 abuses of power? And what are some of those things that you saw  
14 that you never thought you would see?

15                   **MR. TOM MARAZZO:** Well, the biggest thing for me,  
16 which was incredible, was that informed consent was being  
17 absolutely ignored. This is, like, prior -- are you talking  
18 about prior to the convoy or just during?

19                   **MR. ANTOINE D'AILLY:** The things -- the things  
20 you saw that you never thought you would see, which would --  
21 motivated you to participate.

22                   **MR. TOM MARAZZO:** It -- you know, if you were to  
23 look at what the City of Toronto was doing, because I was  
24 living, at the time, close. I was just in the Barry area, so I  
25 was looking at what the Toronto Police were doing, what the  
26 Premier was doing with all the lockdowns. The lockdowns made  
27 absolutely no sense.

28                   The vilification of Canadians by the Prime

1 Minister of Canada was shocking; so deeply disturbing to hear  
2 him talk about Canadians the way he did. That's just one of the  
3 examples.

4 Premier Doug Ford, in the rhetoric that he had --  
5 and the other big thing for me, which was really, really  
6 shocking to me, was that they did not exercise or use Emergency  
7 Management Ontario to manage this entire pandemic for this  
8 province. It was mindboggling to me, and I knew about them  
9 because I actually worked with the EMO representative, who was a  
10 retired Brigadier General, when I was posted to the Headquarters  
11 in Toronto.

12 And so my expectation was to handle this  
13 pandemic, you would have used the very institution within each  
14 province that is meant to handle a pandemic. So I knew things  
15 were fundamentally upside down with the approach that the  
16 government was using. And you would see subsequent effects of  
17 those decisions, which were, you know, shut down a department  
18 store, stop selling kids clothing, and stuff like that. But you  
19 can go and get a case of beer, that's no problem. Right?

20 So there was -- there was a lot of stuff that  
21 were just so absurd. And, cumulatively, after a while that  
22 starts to build up this amount of anxiety and fear. And I know  
23 a lot of people that I was talking to, especially when I was  
24 campaigning, were recounting their time during the lockdowns.  
25 And they felt the same fear that I did of the police, which is  
26 really unusual. I didn't want to go out in public because  
27 honestly, I thought that I was going to be -- it would take  
28 nothing for the police to come for any infraction and start

1 arresting people for the most bizarre things.

2 I mean, we saw a year and a half ago two Calgary  
3 police officers pointed a taser and threatened to arrest a young  
4 kid who was playing hockey out in Calgary, you know?

5 And the next day, Police on Guard went public  
6 because there were law enforcement in this country that were  
7 just appalled by what was going on in this country, and they  
8 decided to start becoming public in defending what they thought  
9 was massive breaches of the Charter, which they spend their  
10 whole careers defending the Charter.

11 And so when the police started to push back to  
12 organizations like Police on Guard or later on, the Mounties for  
13 Freedom, when the police started to push back, that was a sign  
14 that things had really, really gone off the rails, for me.

15 So cumulatively, there were just too many things  
16 to ignore in this society right now. But I think the worst  
17 thing for me was when the convoy was rolling through and I  
18 wasn't part of it, the statements coming from the prime minister  
19 of this country were terrifying, disgusting, just unbecoming of  
20 a prime minister of a country, you know, of people that actually  
21 voted him into represent, and he was acting like he was a king.  
22 And it was appalling.

23 And it's certainly not what I joined the Canadian  
24 military to defend; nothing of the sort. So I just didn't know  
25 how we could possibly call ourselves a free country any more if  
26 our prime minister was allowed to get away with the rhetoric he  
27 was getting away with. And nobody stood up until the truckers.

28 **MR. ANTOINE D'AILLY:** Well, thank you, and thank



1 you for your service.

2 **MR. TOM MARAZZO:** Thank you.

3 **COMMISSIONER ROULEAU:** Okay. Next is the Convoy  
4 Organizers.

5 **MS. BATH-SHÉBA Van den BERG:** Good afternoon, Mr.  
6 Commissioner. Bath-Shéba Van den Berg for Freedom Corp. and the  
7 protestors. We have no questions for Mr. Marazzo. Thank you.

8 **COMMISSIONER ROULEAU:** Thank you. Any re-  
9 examination?

10 **--- RE-EXAMINATION BY MR. JOHN MATHER:**

11 **MR. JOHN MATHER:** Yes, Commissioner, just one  
12 area.

13 Mr. Marazzo, you were asked a few questions with  
14 respect to Mr. Jeremy Mackenzie?

15 **MR. TOM MARAZZO:** Yes, sir.

16 **MR. JOHN MATHER:** Did you know of Mr. Mackenzie  
17 prior to coming to Ottawa?

18 **MR. TOM MARAZZO:** Just from what I saw on his  
19 social media, short videos, that's all.

20 **MR. JOHN MATHER:** Had you ever met him prior to  
21 coming to Ottawa?

22 **MR. TOM MARAZZO:** No.

23 **MR. JOHN MATHER:** Were you aware that he was also  
24 a former Canadian Forces member?

25 **MR. TOM MARAZZO:** Yes, I was, which is one of the  
26 reasons why I followed him.

27 **MR. JOHN MATHER:** Did you know that Mr. Mackenzie  
28 was in Ottawa at certain times during the protest?

1                   **MR. TOM MARAZZO:** I did.

2                   **MR. JOHN MATHER:** Did you ever interact with Mr.  
3 Mackenzie in Ottawa?

4                   **MR. TOM MARAZZO:** Not physically. I phoned him  
5 on two occasions and I had a couple of text messages with him  
6 back and forth.

7                   **MR. JOHN MATHER:** Do you still have those text  
8 messages?

9                   **MR. TOM MARAZZO:** I don't believe I do. I'm on a  
10 different phone and they were just basically as a, "Hi, it's  
11 Tom. I want to have a phone call with you." There was -- I've  
12 had two phone calls with him during the time that I was in  
13 Ottawa.

14                   **MR. JOHN MATHER:** You describe, I think, one of  
15 the phone calls. What was discussed on the other one?

16                   **MR. TOM MARAZZO:** The first one was -- I  
17 actually, now that I think about it, somebody that I knew had  
18 Jeremy's contact info and they reached out and said, "I just  
19 wanted to meet him," because to be honest, at the time, I was  
20 just a fan of what he was doing on his podcasts. I knew there  
21 was a veteran in town and I kind of wanted to get his thoughts.  
22 We had a conversation, reminisced about both being posted to CFB  
23 Petawawa.

24                   But then later on, the next phone call was when I  
25 saw the video of him laughing about what the -- what was going  
26 on in Parliament regarding Diagon, I just called him and I  
27 said, "Tell me everything there is to know about Diagon  
28 because we may get asked about it, and I'm just curious."

1                   **MR. JOHN MATHER:** Who gave you Mr. Mackenzie's  
2 phone number?

3                   **MR. TOM MARAZZO:** I honestly don't know. That  
4 was somebody that I probably met when I first got to Ottawa, and  
5 I did not know any single person. I never met even James Bauder  
6 until I stepped into the conference -- or into the lobby of the  
7 ARC and he brought me into the conference room. So I don't even  
8 know who gave me his phone number.

9                   **MR. JOHN MATHER:** How did you know the person  
10 might have Mr. Mackenzie's phone number?

11                   **MR. TOM MARAZZO:** It's a good question. I can't  
12 -- the only thing I can remember, it was a female that gave the  
13 phone number, and I can't remember how they came to have his  
14 number.

15                   **MR. JOHN MATHER:** Did you ever have any  
16 communications or contact with anyone who was protesting or was  
17 in Coutts, Alberta while you were in Ottawa?

18                   **MR. TOM MARAZZO:** In Coutts? No, I had no  
19 communication with anyone in Coutts.

20                   **MR. JOHN MATHER:** Did you have any communication  
21 with anyone in any other -- at any of the other protest  
22 locations in Canada?

23                   **MR. TOM MARAZZO:** There was one message that  
24 somehow came through either text or email from somebody that was  
25 in Windsor, and I don't -- I cannot honestly -- I don't know who  
26 this person was. I know they were in Windsor and my only  
27 reaction was, "Whatever you do, make sure you keep at least one  
28 lane open across that bridge so that there can be traffic going

1 back and forth."

2 **MR. JOHN MATHER:** Do you still have a copy of  
3 that message?

4 **MR. TOM MARAZZO:** I don't believe I do. And I --  
5 and because I don't even know who the person was, I don't. And  
6 to be honest, I really did not want to have contact with any  
7 other protest around the country. I had my hands full with what  
8 I was doing, and all of these convoys and protests were all  
9 organic. They started all naturally on their own from citizens  
10 that were absolutely fed up with what was happening to this  
11 society and this country. So I was perfectly happy to have no  
12 contact with any other protests other than the one I was  
13 involved in.

14 **MR. JOHN MATHER:** During your two conversations  
15 with Mr. Mackenzie, did he ever indicate to you that he was in  
16 contact with anyone in any of the other protests or occupations  
17 in Canada?

18 **MR. TOM MARAZZO:** No, sir.

19 **MR. JOHN MATHER:** Thank you. Those are my  
20 questions.

21 **COMMISSIONER ROULEAU:** Thank you. I just have a  
22 few short questions.

23 Just following up on one of those, the  
24 penultimate question, you answered all of the protests across  
25 the country started organically.

26 **MR. TOM MARAZZO:** Yes.

27 **COMMISSIONER ROULEAU:** How do you know that?

28 **MR. TOM MARAZZO:** I didn't start to learn about

1 the protest until I was already in Ottawa. The only one that I  
2 knew about was in -- I was in Ottawa and then people would just  
3 say, "Hey, there's another protest in Windsor," or the people in  
4 the room, they would just be discussing where they had heard  
5 about another protest somewhere else.

6 I had just assumed that it was very much like  
7 this protest in Ottawa where citizens just said, "We're seeing  
8 Ottawa as an example that you can actually do something."

9 And I think the Ottawa protest was an inspiration  
10 for a lot of people, and what I later learned was that there was  
11 20 convoys around the world, and they were all saying that they  
12 were inspired by the convoy in Ottawa.

13 So it seemed to be a logical conclusion to me  
14 that there was further convoys being inspired by Ottawa around  
15 Canada as well.

16 **COMMISSIONER ROULEAU:** So it's an assumption that  
17 you're ---

18 **MR. TOM MARAZZO:** It's an assumption.

19 **COMMISSIONER ROULEAU:** I just wondered since you  
20 made it as a statement, if you had some information.

21 **MR. TOM MARAZZO:** No, sir.

22 **COMMISSIONER ROULEAU:** Now, the -- what I wanted  
23 to ask a bit more is the 322 trucks.

24 **MR. TOM MARAZZO:** Yes.

25 **COMMISSIONER ROULEAU:** It wasn't clear to me what  
26 those 322 trucks were. And by that, I mean, were those part of  
27 the convoy group you were involved with or is that total trucks?

28 **MR. TOM MARAZZO:** I understand the confusion.

1           We -- I was asking for a head count of all of the  
2 trucks in the downtown, so Wellington being the sort of centre  
3 of gravity, and all of the perpendicular and parallel streets,  
4 based off of Wellington. And I had asked for people that I was  
5 working with daily if you could go out and get and find out how  
6 many vehicles we have on every street.

7           **COMMISSIONER ROULEAU:** It's the "we". I'm trying  
8 to figure out ---

9           **MR. TOM MARAZZO:** Yeah. These were convoys.  
10 From my understanding, what happens -- so for example, a convoy  
11 came in from New Brunswick, and as they got into the city, they  
12 had a plan to stick together. And as soon as they got here and  
13 they interacted with the Ottawa Police, the Ottawa Police  
14 started directing that particular convoy, as an example, New  
15 Brunswick, and that entire convoy got spread out all over the  
16 place.

17           Same thing came from the West, same thing came  
18 from Quebec. So when they came in here, they expected they  
19 drove in together, they'd stay together, but they were spread  
20 out like buckshot all over all of the streets.

21           So you couldn't say that hey, the convoy from New  
22 Brunswick that started with 50 trucks, as an example, were still  
23 confined to 50 trucks over on a certain area. They just  
24 literally got spread out all over the place and nobody can  
25 control that.

26           So we were trying to organize ourselves in a way  
27 that we could get effective communication going between the ARC  
28 and the -- and every single individual truck driver. We just

1 wanted to reduce our span of control to the convoy leader from  
2 New Brunswick just to talk to that person, you go share it.

3 We couldn't do that because we were spread out  
4 everywhere, and so communications were near impossible for us.

5 **COMMISSIONER ROULEAU:** Okay. Again, it wasn't  
6 clear. What I'm trying to understand is, 322, is that a total  
7 truck count for the City of Ottawa, all the streets or is it  
8 those are the trucks that you had a relationship with either  
9 because they were the Western Convoy or one of your organizer's  
10 convoys?

11 **MR. TOM MARAZZO:** At the time, I believe that was  
12 just to the downtown. That did not include the parkway. That  
13 didn't include 88, didn't include Arnprior. That was just in  
14 the city on that given day. It was 322 trucks that was given to  
15 me on a sticky note as the total number of trucks in the  
16 downtown core on that day.

17 **COMMISSIONER ROULEAU:** So it wouldn't be the  
18 trucks that your group controlled?

19 **MR. TOM MARAZZO:** No.

20 **COMMISSIONER ROULEAU:** It was a -- it would  
21 include the Rideau Street ---

22 **MR. TOM MARAZZO:** Yes.

23 **COMMISSIONER ROULEAU:** --- trucks, all of the  
24 trucks.

25 **MR. TOM MARAZZO:** Yes, all of the trucks.

26 **COMMISSIONER ROULEAU:** And the second thing -- I  
27 wanted to talk to just briefly about logistics and understand a  
28 bit better. Were you told when new convoys were coming in?

1           **MR. TOM MARAZZO:** We would get -- we would get  
2 reports that there would be a substantial convoy coming in from  
3 a new area and then only to find out that that convoy either  
4 didn't show up or was much smaller than what was reported. And  
5 then sometimes convoys would show up and we didn't even know  
6 they were on their way. So the -- our ability to track convoys  
7 was very, very difficult. So there's really no clear answer as  
8 to -- to that question, unfortunately.

9           **COMMISSIONER ROULEAU:** But was that your  
10 responsibility, to deal with new convoys coming in, leaving  
11 aside how much you knew about what was coming in?

12           **MR. TOM MARAZZO:** It would have been because then  
13 we would have been able to, as a group in the Arc, discuss and  
14 figure out what the best way to get them into a good spot would  
15 be. So where I was to the Arc, yes, we would have handled that  
16 movement into the city and put them somewhere appropriate.

17           **COMMISSIONER ROULEAU:** And that continued -- or  
18 how long did that continue where trucks were coming in and you  
19 would direct them to where to go?

20           **MR. TOM MARAZZO:** I would say that was probably  
21 about the first week and a half that I would be involved in that  
22 kind of -- those discussions. But my role started to evolve and  
23 so, after I brought in a couple of people, one individual who  
24 was another military officer -- once I brought him in, I kind of  
25 handed that off and then I worked more strategically with Keith  
26 and Eva to do different things, so really about a week and a  
27 half, max.

28           **COMMISSIONER ROULEAU:** And finally, with respect



1 to those convoys coming in, how -- which convoys would end being  
2 involved with and which would you not be involved with, or was  
3 that sort of a hazard?

4 **MR. TOM MARAZZO:** For me, only the ones that were  
5 coming directly into the city. I wasn't involved in the ones  
6 going to Arnprior, or 88, or to the Parkway. I was only  
7 involved in the ones in the downtown core.

8 **COMMISSIONER ROULEAU:** But I guess I'm trying to  
9 understand, were you somewhere have an official -- how would  
10 convoys know that you will direct the convoy rather than the  
11 police, for example?

12 **MR. TOM MARAZZO:** We would go through truck  
13 captains and we also had people that were in the Arc that would  
14 go out and try to meet with them and sort of direct -- create  
15 that contact between them and then guide them in where we wanted  
16 them -- or where we could find space for them.

17 **COMMISSIONER ROULEAU:** So it wasn't necessarily  
18 you ---

19 **MR. TOM MARAZZO:** I would not.

20 **COMMISSIONER ROULEAU:** --- who would guide them  
21 in?

22 **MR. TOM MARAZZO:** No, I basically was -- I -- I  
23 rarely got out of the Arc. Not many occasions could I detach  
24 myself from the Arc.

25 **COMMISSIONER ROULEAU:** And would the -- when you  
26 did -- or your delegates do that ---

27 **MR. TOM MARAZZO:** Yes.

28 **COMMISSIONER ROULEAU:** --- would it be with the

1 police or -- as opposed to despite or contrary to police  
2 instructions?

3 **MR. TOM MARAZZO:** If there was an opportunity to  
4 involve the police, we would have always sought to do that, yes.

5 **COMMISSIONER ROULEAU:** Okay. Thank you very  
6 much.

7 **MR. TOM MARAZZO:** Thank you.

8 **COMMISSIONER ROULEAU:** So we're going to take the  
9 morning break -- or the afternoon break. I made the same  
10 mistake as yesterday. So we'll take the afternoon break, 15  
11 minutes, and then we'll come back with our final witness for  
12 today.

13 **THE REGISTRAR:** The Commission is in recess for  
14 15 minutes. La Commission est levée pour 15 minutes.

15 --- Upon recessing at 4:22 p.m.

16 --- Upon resuming at 4:40 p.m.

17 **THE REGISTRAR:** The Commission is reconvened. La  
18 Commission reprend.

19 **MR. JEFFREY LEON:** Jeffrey Leon, co-lead,  
20 Commission counsel. The next witness is Patrick King and he is  
21 here with his counsel Natasha Calvino.

22 **MS. NATASHA CALVINHO:** Good afternoon.

23 **COMMISSIONER ROULEAU:** Good afternoon, Ms.  
24 Calvino.

25 **--- STATEMENT BY MS. NATASHA CALVINHO:**

26 **MS. NATASHA CALVINHO:** Thank you for having me.  
27 I am counsel for Mr. King on his criminal charges. As I'm sure  
28 the Commission is aware, my client is still facing a number of

1 criminal charges that are -- there's a publication ban on and  
2 there's -- trial dates have been set and they're currently still  
3 before the courts.

4 Mr. King is here today, as he was compelled to by  
5 virtue of his subpoena, and he has answered to that to that  
6 subpoena. He invokes his protections under the *Canada Evidence*  
7 Act and the Canadian Charter of Rights and Freedoms vis a vis  
8 his evidence. We consider -- we consider his response to  
9 questions put to him to be compelled statements -- or compelled  
10 answers for any future proceeding.

11 We are here and we understand the parameters of  
12 the Commission and there quite tight time constraints on the  
13 information needing to come out and witnesses needing to be  
14 called. But that having been said, late yesterday we received,  
15 less than 24 hours before the hearing, 127 individual items and  
16 2,406 individual pages of material. Mr. King is anxious to  
17 respond to his subpoena and offer his evidence. He and I have  
18 done our level best to get through the materials. There may  
19 become a point in time where he may need some guidance from me  
20 or we might need a bit of time to review something because we've  
21 done the best that we can but we weren't able to get through all  
22 of it and I would ask for the Court's -- or the Commission's  
23 indulgence if we get to that point, but I hope we don't. And  
24 Mr. King is available to testify. Thank you, sir.

25 **COMMISSIONER ROULEAU:** Okay, thank you, and yes,  
26 I understand about the subpoena and the protections. That's  
27 obviously provided. And we do appreciate that it is sometimes  
28 challenging to deal with the documentation. I think you would

1 have a lot of sympathy from the parties and the Commission  
2 counsel so I understand that. And we've been very  
3 accommodating, as required, and certainly, if there's something,  
4 please provide some sort of an indication and we can sort it  
5 out.

6 **MS. NATASHA CALVINHO:** Thank you very much, Mr.  
7 Commissioner.

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

9 **MR. JEFFREY LEON:** Thank you. Mr. King ---

10 **THE REGISTRAR:** I'm sorry.

11 **MR. JEFFREY LEON:** Oh, sorry.

12 **COMMISSIONER ROULEAU:** He has to be sworn.

13 **THE REGISTRAR:** Mr. King, will you swear on a  
14 religious document or do you wish to affirm?

15 **MR. PATRICK KING:** I'd like to swear on a Bible,  
16 please.

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

19 **MR. PATRICK KING:** Full name is Patrick James  
20 King, p-a-t-r-i-c-k, j-a-m-e-s, k-i-n-g.

21 **--- MR. PATRICK KING, Sworn**

22 **--- EXAMINATION IN-CHIEF BY MR. JEFFREY LEON:**

23 **MR. JEFFREY LEON:** Mr. King, just to follow on  
24 what your counsel has just said, if at any time during my  
25 questioning you need time to review a document, don't hesitate  
26 to ask.

27 **MR. PATRICK KING:** Thank you.

28 **MR. JEFFREY LEON:** And I'm going to be asking you

1 questions to give you an opportunity to explain to the  
2 Commissioner your involvement in the Freedom Convoy and also to  
3 give you a chance to respond to some of the evidence that's been  
4 led before the Commission.

5 I'd like to start with your background. I  
6 understand you were born in Sault Ste. Marie?

7 **MR. PATRICK KING:** That's correct, yes.

8 **MR. JEFFREY LEON:** And how long did you live  
9 there?

10 **MR. PATRICK KING:** Until I was 18.

11 **MR. JEFFREY LEON:** And then where did you go?

12 **MR. PATRICK KING:** I moved out to Alberta where  
13 there was work and I've been living in Red Deer, Alberta ever  
14 since.

15 **MR. JEFFREY LEON:** And what sort of work do you  
16 do?

17 **MR. PATRICK KING:** Oh boy, I started out 22  
18 years in oil and gas; I worked my way up from a roughneck all  
19 the way up to a driller, to a front-line supervisor, to a full  
20 completion's specialist and then I went back to University and I  
21 got my degree in Occupational Health & Safety Environment, a  
22 three-year degree from the University of Alberta.

23 From there, I took a position as a Health &  
24 Safety Manager - or sorry, Admin. and I would look after  
25 upstream oil and gas manufacture.

26 And from -- I was a H2S instructor; I drove  
27 truck; I had a Class 1 driver's licence for oversized loads; I  
28 also have a course -- I guess a Certificate, I was a Logistics

1 Coordinator and a dispatcher.

2 **MR. JEFFREY LEON:** Thank you. Now, your counsel  
3 has indicated that you have been charged with criminal offences  
4 and I understand that a condition of your bail is, that you are  
5 not allowed to use social media; is that correct?

6 **MR. PATRICK KING:** I'm not allowed to do  
7 anything. I've had absolutely every right of a Canadian citizen  
8 stripped of me. My freedom of speech, my freedom of protest, my  
9 freedom -- everything.

10 **MR. JEFFREY LEON:** Am I correct, you can't use  
11 social media?

12 **MR. PATRICK KING:** No. You are absolutely  
13 correct.

14 **MR. JEFFREY LEON:** Thank you. So I would like  
15 to ask you about your use of social media prior to your being  
16 charged in the latter part of February 2022. So if we can talk  
17 about the period, let's say, 2019 to March 2022, what kinds of  
18 social media did you use?

19 **MR. PATRICK KING:** Facebook, Instagram, that was  
20 it. I would never go on twitter; that's a troll site; that's a  
21 joke; but Facebook and Instagram.

22 **MR. JEFFREY LEON:** TikTok?

23 **MR. PATRICK KING:** Just to like watch it.

24 **MR. JEFFREY LEON:** YouTube?

25 **MR. PATRICK KING:** Oh, I had YouTube but around  
26 the time that Donald Trump was being elected I hold -- actually  
27 hold is a title; only him and myself are the only ones who have  
28 ever been banned from using any Google product. So I would

1 never promote YouTube.

2                   **MR. JEFFREY LEON:** And I understand you had a  
3 large following on social media; is that correct?

4                   **MR. PATRICK KING:** Can you define "large"?

5                   **MR. JEFFREY LEON:** Well, how big was your  
6 following?

7                   **MR. PATRICK KING:** It was big.

8                   **MR. JEFFREY LEON:** Can you define "big"?

9                   **MR. PATRICK KING:** It was international; it was  
10 big.

11                   **MR. JEFFREY LEON:** Okay. 100,000, 200, 300,  
12 400,000?

13                   **MR. PATRICK KING:** That all depends on  
14 Facebook's algorithms of what they really say. On my website  
15 and on my Facebook page about half a million people.

16                   **MR. JEFFREY LEON:** Thank you. And I understand  
17 on Facebook you would post live events; is that correct?

18                   **MR. PATRICK KING:** I would do Podcasts and I  
19 would do media and I would catch interactions in real time for  
20 basically - just show it in real - in reality and not some  
21 distorted mainstream media view. I'd show you what it was in  
22 the real time.

23                   **MR. JEFFREY LEON:** And I understand in 2019 you  
24 were involved in a Convoy called "United We Roll"?

25                   **MR. PATRICK KING:** Yes, sir.

26                   **MR. JEFFREY LEON:** Is that correct?

27                   **MR. PATRICK KING:** Yes, sir.

28                   **MR. JEFFREY LEON:** And that was a protest over

1 some oil and gas issues?

2 **MR. PATRICK KING:** That was a protest over Bill  
3 C69 and C48, which is the anti-pipeline and the anti-harbor  
4 moratorium of which when we came to Ottawa, we were successful.  
5 They reopened all the contracts after. And actually since I've  
6 been incarcerated as of June 2022, both those bills have been  
7 scrapped because they had been deemed unconstitutional and  
8 Alberta finally got our pipelines and we're finally back to work  
9 again.

10 **MR. JEFFREY LEON:** And that Convoy travelled from  
11 - was it Red Deer to Ottawa?

12 **MR. PATRICK KING:** Red Deer, Alberta, yeah. We  
13 left on February 14<sup>th</sup> and we like to deem it as "The Love of Our  
14 Country". On Valentine's Day we left to stand up for our rights  
15 and exercise our democratic right to a freedom of peaceful  
16 assembly, to exercise our democratic right to a freedom to  
17 protest and to have our voices heard from the Government.

18 **MR. JEFFREY LEON:** And who led that Convoy?

19 **MR. PATRICK KING:** I was in the pilot truck,  
20 myself and another person by the name of "Angie Reed"; love you  
21 Angie. Glen Carritt was involved along with -- he drove OPE --  
22 the firetruck; we brought a firetruck. He was an oil and gas  
23 fire suppression unit.

24 **MR. JEFFREY LEON:** How many vehicles were in the  
25 Convoy?

26 **MR. PATRICK KING:** When it got to Wellington we  
27 had about 170, 178, I believe.

28 **MR. JEFFREY LEON:** Was Mr. Bodder involved in



1 that Convoy?

2 **MR. PATRICK KING:** Involved in what way?

3 **MR. JEFFREY LEON:** Was he part of it?

4 **MR. PATRICK KING:** Sure.

5 **MR. JEFFREY LEON:** What was his involvement?

6 **MR. PATRICK KING:** A fellow Canadian exercising  
7 his democratic right to protest.

8 **MR. JEFFREY LEON:** Was he part of organizing it?

9 **MR. PATRICK KING:** No.

10 **MR. JEFFREY LEON:** So when you got to Ottawa, how  
11 long were you there?

12 **MR. PATRICK KING:** We arrived, I believe it was  
13 the 19<sup>th</sup> of February; we protested the 20<sup>th</sup> and 21<sup>st</sup> and then we  
14 left that following Monday.

15 **MR. JEFFREY LEON:** And you went back to Red Deer?

16 **MR. PATRICK KING:** Yeah. But I'd like to say  
17 that we left because the politicians acknowledged why we were  
18 there; they came out and said "We hear you; we're here to  
19 support you and we will back you and we will do everything we  
20 can to try and get your issues heard."

21 **MR. JEFFREY LEON:** Okay. Now, I would like to  
22 come to your involvement in the Freedom Convoy, if I could. I'm  
23 trying to keep track of the time, but it doesn't seem to be  
24 working.

25 How did you first get involved in the Freedom  
26 Convoy?

27 **MR. PATRICK KING:** Well, I had already been on  
28 social media; I had already been doing my stuff that I always do

1 and I happen to see some people that were talking about the  
2 trucking industry and how they were about to be affected. And I  
3 know that our truckers here in Canada are the backbone of the  
4 economy in Canada. They move the freight, their importance is a  
5 very under - basically they're forgotten; they're kind of --  
6 yeah, they're a trucker/trucker, whatever trucker. But I knew  
7 the importance that if you stopped the trucking industry within  
8 72 hours you'll be brother on brother for a loaf of bread.

9                   And when they started to hit the truck drivers,  
10 and these guys have already been working diligently throughout  
11 this nonsense, we'd seen it as a direct attack against the  
12 Canadian economy. And not only a direct attack against the  
13 Canadian economy, but a direct attack to -- truckers are the  
14 guys that want to be left alone; they want to work in their  
15 trucks, they want to go do their job independently; leave us  
16 alone. We won't create a stir, we won't cause a problem, we'll  
17 pay our taxes and -- it felt like they needed a voice.

18                   **MR. JEFFREY LEON:** Did somebody contact you and  
19 ask you to get involved?

20                   **MR. PATRICK KING:** Nope.

21                   **MR. JEFFREY LEON:** What did you do to get  
22 involved?

23                   **MR. PATRICK KING:** Well, I reached out to a view  
24 people and I asked if they'd like to, you know, let's talk about  
25 it.

26                   **MR. JEFFREY LEON:** Who did you reach out to?

27                   **MR. PATRICK KING:** I reached out to Chris Barber,  
28 Brigitte Belton. I reached to, well, basically them, those two,

1 and I said, "I'd love to have you on my show and I really think  
2 what you guys are about to -- what you guys are wanting to do, I  
3 can be an asset because I've done this before back in 2019 and I  
4 can help you out in any way possible."

5 **MR. JEFFREY LEON:** And am I correct that you then  
6 had a Facebook live event on January, was it, 13<sup>th</sup>, 2022?

7 **MR. PATRICK KING:** If that's the date that you  
8 have, yes.

9 **MR. JEFFREY LEON:** And as you -- Mr. Barber, Ms.  
10 Belton, and I understand James Bauder were all on -- part of  
11 that?

12 **MR. PATRICK KING:** That's correct, yes.

13 **MR. JEFFREY LEON:** And ---

14 **MR. PATRICK KING:** I've got to say there was  
15 people involved but I've had my social media stripped. I've had  
16 all my videos gone. I can't recollect who was all there but  
17 that sounds very close to who was there. I think there were  
18 some other people that were involved, too. I think Dave  
19 Steenburg was one. Well, there was a couple -- I think Joe  
20 Janzen was one. There was a few people, yeah.

21 **MR. JEFFREY LEON:** And during that event, you  
22 talked about the plan for a Freedom Convoy with those people who  
23 were with you?

24 **MR. PATRICK KING:** Well, we had thrown the idea  
25 around. We had said, "Do you guys really want to do this?" And  
26 they're like, "Yeah, we should do this." And I said, "Okay.  
27 Well, I'll do everything I can to help you. I'll give you the  
28 platform. I'll give you the voice. I'll allow -- not allow but

1 I'd like to help you because I see what you're doing is  
2 absolutely prophetic." Finally, the hard-working, blue-collared  
3 people of Canada were going to stand up."

4 **MR. JEFFREY LEON:** And was this first time you'd  
5 met Mr. Barber and Ms. Belton?

6 **MR. PATRICK KING:** Yes.

7 **MR. JEFFREY LEON:** And my information was you had  
8 about 3,000 viewers to that event; does that sound right?

9 **MR. PATRICK KING:** If that's what -- you have a  
10 number, sure. I never -- I was never concerned about the  
11 numbers. I could have two people in the room and it didn't  
12 matter.

13 **MR. JEFFREY LEON:** And have you told us why you  
14 decided to get involved with the Freedom Convoy based on the  
15 statement you just made?

16 **MR. PATRICK KING:** The reason I did it was,  
17 basically, I have gone through my own issues with these mandates  
18 and I have my own stance and my own beliefs on these mandates  
19 and what they're doing -- and now I want everybody to remember,  
20 a mandate is not a law. And they were pushing this and I  
21 finally found people that didn't want it pushed on them anymore.

22 **MR. JEFFREY LEON:** And what did you understand  
23 was the goal of the Freedom Convoy?

24 **MR. PATRICK KING:** To go and protest and exercise  
25 your democratic right to a freedom of peaceful protest, to a  
26 freedom of assembly, to exercise your voice and be heard by  
27 politicians of your concerns and your -- basically, your  
28 agitation with the way things are being controlled.

1                   **MR. JEFFREY LEON:** And later in January, the 21<sup>st</sup>,  
2 did you have another video stream that involved Tamara Lich,  
3 Chris Barber, James Bauder, and others; do you recall that?

4                   **MR. PATRICK KING:** You bet.

5                   **MR. JEFFREY LEON:** And I understand there was  
6 general discussion of what was going to happen with the Freedom  
7 Convoy?

8                   **MR. PATRICK KING:** Yes, there was a discussion.  
9 It was basically, like, so organic, like, "How are we going to  
10 do this? Who's going to do what? Who's going to be doing this?  
11 Who going to be doing that?" I basically was a platform for  
12 these people to be able to, like, show who they are.

13                   **MR. JEFFREY LEON:** And by this time, do you know  
14 if anyone in that group had contacted any members of a police  
15 force to tell them ---

16                   **MR. PATRICK KING:** Oh, yeah.

17                   **MR. JEFFREY LEON:** --- that this was going?

18                   **MR. PATRICK KING:** Yeah. Yeah. James Bauder  
19 bragged about how he had Ottawa around his little finger, that  
20 he had all the police and he had all the connections. And I was  
21 like, "Is that the same connections of when we did the United We  
22 Roll?" And he's like, "Yes." I'm like, "Oh, okay." And so I  
23 reached out because I have a rapport with PPS.

24                   I'm -- I've travelled around Canada protesting  
25 and speaking on public platforms and I've given my -- like, I've  
26 basically set a good communication between these officers. So I  
27 reached out to these officers and said, "We're looking at  
28 bringing another convoy to Ottawa. Remember me?" And they're

1 like, "Oh, yeah. Yeah, we remember you, Pat." I'm like, "It's  
2 good, right?" They're like, "Oh, yeah, you're always great when  
3 you're here."

4 **MR. JEFFREY LEON:** And you some of those -- at  
5 least one of those officers on your stream that night?

6 **MR. PATRICK KING:** Well, we had a few officers,  
7 yeah. Yeah, they were on our streams, yes.

8 **MR. JEFFREY LEON:** And discussing safety issues  
9 and that sort of thing?

10 **MR. PATRICK KING:** Absolutely, safety is number  
11 one, like your rules of the road and all that. And they knew  
12 who I was. They knew how we had organized the 2019 Convoy. And  
13 they knew how absolutely law-abiding and professional that we  
14 were.

15 **MR. JEFFREY LEON:** And you travelled to Ottawa  
16 with the western leg of the convoy?

17 **MR. PATRICK KING:** Yes, sir.

18 **MR. JEFFREY LEON:** And what type of vehicle were  
19 you driving?

20 **MR. PATRICK KING:** I wasn't driving. I had  
21 somebody who was driving our motorhome and I sat passenger in  
22 the motorhome.

23 **MR. JEFFREY LEON:** And did you -- where did you  
24 join up with the Convoy?

25 **MR. PATRICK KING:** I joined up with the main  
26 convoy in Calgary.

27 **MR. JEFFREY LEON:** Now, Clerk, can you please  
28 bring up HRF00001221? This is a chronology of events that was

1 put together by the group of convoy organizers and is now an  
2 exhibit in these proceedings, and it's a timeline of events from  
3 their perspective. And I want to ask you about a few entries  
4 that refer to you. We can go to the bottom of page 2, please.  
5 You can see there:

6 "January 24, Chris Barber and Tamara  
7 Lich meet."

8 And then:

9 "Concerns re. Pat King expressed."

10 And:

11 "Tamara and Chris discussed concern  
12 about Pat King after viewing a Tweet  
13 with a video making reference to  
14 bullets. Chris agreed perhaps Pat  
15 should be send home but there was  
16 concern about the trucks Pat brought  
17 with him. Talked to Pat about the Tweet  
18 on the roadside and he stated the video  
19 was an old one about an issue on a  
20 reserve and had been heavily edited to  
21 make it appear as though it was  
22 regarding the Convoy. Following this, a  
23 Captains meeting was held in Kenora at  
24 the end of the day where everyone  
25 expressed concern about Pat King's  
26 involvement. The decision was made that  
27 someone would talk to Pat within the  
28 coming days and request that he not

1 attend in Ottawa."

2 Do you remember that conversation?

3 **MR. PATRICK KING:** No, I do not.

4 **MR. JEFFREY LEON:** Do you deny it happened?

5 **MR. PATRICK KING:** Yes. I'm not the one there.  
6 They're discussing their concerns.

7 **MR. JEFFREY LEON:** That wasn't what I asked you.  
8 I'm saying, did the conversation happen, sir?

9 **MR. PATRICK KING:** No. A conversation came up  
10 of, "Hey, there's a Tweet out there." I said, "Don't worry  
11 about it."

12 **MR. JEFFREY LEON:** Okay. Can we go to page 3 of  
13 this document?

14 **MR. PATRICK KING:** I'd like to give a little bit  
15 of an explanation there. The explanation is I have been  
16 absolutely harassed. I've been absolutely defamed, character  
17 assassination by a certain group. And they edit videos and they  
18 cut and splice, and they take 10 seconds here and they blow it  
19 out of proportion, and I've been dealing with this for years.

20 **MR. JEFFREY LEON:** I will give you an opportunity  
21 -- I'm show you some of the videos and I'll give you an  
22 opportunity ---

23 **MR. PATRICK KING:** Oh, absolutely. I can't wait.

24 **MR. JEFFREY LEON:** --- to comment on them.

25 **MR. PATRICK KING:** I've been waiting for years to  
26 tell you guys how you got -- how these videos are.

27 **MR. JEFFREY LEON:** So on page 3, you'll see under  
28 January 26<sup>th</sup>:



1 "Pat King was on the radio annoying  
2 others. Pat had tried to pull in front  
3 of everyone with his motorhome but was  
4 eventually sent to the back of the  
5 convoy. Everyone was concerned about  
6 Pat's involvement and plans were made  
7 to talk to him in the evening when they  
8 arrived in Thunder Bay. Unfortunately,  
9 Pat did not stick around but continued  
10 to Sault Ste. Marie, so no one had a  
11 chance to speak to him."

12 **MR. PATRICK KING:** No.

13 **MR. JEFFERY LEON:** Were you aware that that had  
14 happened?

15 **MR. PATRICK KING:** I was one of the lead vehicles  
16 from Calgary all the way to Kenora. When we got to Kenora, I  
17 was in the front, and when I got to Thunder Bay, I sat for two  
18 hours directing everybody into their parking spots, and I told  
19 everybody that I was leaving for Harris Bay to have a fuel stop  
20 and meals and basically, a rest stop for everybody, and that's  
21 where I was going.

22 **MR. JEFFERY LEON:** And if you can bring up, Mr.  
23 Clerk, HRF00000646? And again, this is a document that's been  
24 provided by the Freedom Convoy, and it appears to be a summary  
25 of a conversation between you and Tamara Lich. Do you recall  
26 having a conversation with Ms. Lich on January 28th?

27 **MR. PATRICK KING:** Yeah.

28 **MR. JEFFERY LEON:** And did she request that you

1 not attend in Ottawa?

2 **MR. PATRICK KING:** No. What was happening is, we  
3 were at a rest stop. I said, "Oh, my God, this has gotten big."  
4 I said, "I'm getting death threats and I might need security  
5 when I'm in Ottawa."

6 And I said, "This has got way bigger."

7 And I may have said this part, this little part  
8 here where about the organizing thing, but then I checked myself  
9 right away and I realized Tamara said, "Whoa, it's not all about  
10 you."

11 And I'm like, "You're right. You're absolutely  
12 right."

13 **MR. JEFFERY LEON:** Okay.

14 **MR. PATRICK KING:** But that comment at the  
15 bottom, "check your fucking ego", that never happened.

16 **MR. JEFFERY LEON:** Thank you. Now, you proceeded  
17 on to Ottawa?

18 **MR. PATRICK KING:** Absolutely.

19 **MR. JEFFERY LEON:** Now, were you familiar with an  
20 organization called "Adopt a Trucker" program or a program  
21 "Adopt a Trucker"?

22 **MR. PATRICK KING:** Yeah.

23 **MR. JEFFERY LEON:** And can we put up please  
24 COM00000571? And you'll see at the top -- can you just scroll  
25 down -- it says, "Adopt a Trucker campaign created by Chris  
26 Garrah."

27 Do you know Mr. Garrah?

28 **MR. PATRICK KING:** I do, yes.

1                   **MR. JEFFERY LEON:** And to scroll a little further  
2 up -- no, sorry, down -- in the first line there, you'll see it  
3 says towards the end, "We are endorsed by Pat King and Canada  
4 Unity."

5                   Did you endorse this campaign?

6                   **MR. PATRICK KING:** I endorsed everybody.

7                   **MR. JEFFERY LEON:** Did you endorse this campaign  
8 by "Adopt a Trucker"?

9                   **MR. PATRICK KING:** Endorse by -- what do you mean  
10 by endorsed? Can you explain?

11                   **MR. JEFFERY LEON:** Did you support it and  
12 publicize it?

13                   **MR. PATRICK KING:** Absolutely, yeah.

14                   **MR. JEFFERY LEON:** And who asked you to get  
15 involved in this?

16                   **MR. PATRICK KING:** They were just a group that we  
17 had asked for people to -- in the Ottawa area, that community  
18 who wanted to help Adopt a Trucker was -- you would take a  
19 trucker and basically billet, like, billeting.

20                   So if you remember hockey, when you'd go to  
21 tournaments, you would stay with a billet, so people are  
22 offering up their homes for truckers to come have showers.  
23 There was food and whatever they needed in necessities, Chris  
24 and their group were going to look after the -- I don't know how  
25 you say it -- the care and wellbeing of truckers who didn't have  
26 a place to stay, like, didn't have money for hotels or -- we  
27 were trying to reduce costs for lodgings.

28                   **MR. JEFFERY LEON:** And I take it in this sense,

1 you were in demand because of your large social media following  
2 to get your -- put your name to things like the Freedom Convoy,  
3 like the Adopt a Trucker?

4 **MR. PATRICK KING:** It happens a lot. A lot of  
5 people like to, you know, use my platform, and I'm okay with it  
6 and I do it on -- I absolutely invite it. A lot of people use  
7 my name or my platform to gain attention for their cause, and  
8 I'm absolutely 100 percent agreeable to that. I think everybody  
9 has a right to have their say and get their point across, and I  
10 never hold a bias.

11 So I make sure that everybody use it, take it,  
12 take my platform. Do what you can.

13 **MR. JEFFERY LEON:** And if I could ask you, did  
14 you have your own group as part of this convoy that came with  
15 you?

16 **MR. PATRICK KING:** I was a road captain for, I  
17 believe, the northern part of Alberta, so I took on the  
18 responsibility for those people that were part of our initial  
19 jump from Red Deer to Calgary and then onwards to Ottawa.

20 **MR. JEFFERY LEON:** And can you estimate how many  
21 trucks were in that group?

22 **MR. PATRICK KING:** Oh, boy. When we left Red  
23 Deer, there was about 50 of us, but once I found out further on,  
24 we tried to get people to sign the documents and everything in  
25 Calgary and it turned out to be about 148, if I'm not mistaken,  
26 that I was in -- I was responsible for, I guess responsible, but  
27 taking care of their paperwork.

28 **MR. JEFFERY LEON:** And you arrived in Ottawa on

1 January 29?

2 **MR. PATRICK KING:** Yes, sir.

3 **MR. JEFFERY LEON:** And ---

4 **MR. PATRICK KING:** No, no. We arrived in  
5 Arnprior.

6 **MR. JEFFERY LEON:** I see.

7 **MR. PATRICK KING:** And from there -- I'll never  
8 forget it -- it was the most greatest, most elating moment of my  
9 life where I can pass them off to Andrew and say, "They're your  
10 problem now."

11 **MR. JEFFERY LEON:** Where did you go? When did  
12 you get to Ottawa, what date?

13 **MR. PATRICK KING:** I got to Ottawa that night,  
14 once everybody got to Arnprior. I left and I said, "I'm done.  
15 I'm going into town. I want to get my hotel room," and I went  
16 to my hotel.

17 **MR. JEFFERY LEON:** What hotel did you stay at?

18 **MR. PATRICK KING:** One of the ones downtown.  
19 Holiday Inn on I believe Albert. I'm not sure.

20 **MR. JEFFERY LEON:** Okay. And what did you do  
21 with your vehicle?

22 **MR. PATRICK KING:** I never had a vehicle.

23 **MR. JEFFERY LEON:** So how did you get to the  
24 Holiday Inn?

25 **MR. PATRICK KING:** I -- we dropped the motorhome  
26 off at a secure location and we had people give us a ride into  
27 the hotel.

28 **MR. JEFFREY LEON:** And did -- at one point, were

1 you involved with a group at Confederation Park?

2 **MR. PATRICK KING:** No.

3 **MR. JEFFREY LEON:** I want to move forward to  
4 February 12th, and on that date, did you learn that an agreement  
5 had been reached with the mayor of Ottawa to move trucks out of  
6 residential areas and onto Wellington Street?

7 **MR. PATRICK KING:** Yeah, I heard that that was  
8 the plan.

9 **MR. JEFFREY LEON:** And who did you hear that  
10 from?

11 **MR. PATRICK KING:** Just from other road captains  
12 and people that were -- I don't know, people who thought they  
13 had a role in this and were a voice and could make calls, I  
14 guess, if you say, like, make calls, like, if they were told  
15 something and passed it on to the block captains and then the  
16 block captains would pass it on to the drivers and ---

17 **MR. JEFFREY LEON:** And so did you agree with the  
18 -- that idea?

19 **MR. PATRICK KING:** Sure, whatever you want. I  
20 was here to help in any way I -- they needed me.

21 **MR. JEFFREY LEON:** Mr. Clerk, could you put up a  
22 video? It's COM00000881?

23 And I understand this is a video you published on  
24 YouTube ---

25 **MR. PATRICK KING:** I don't have YouTube.

26 **MR. JEFFREY LEON:** --- on February 13?

27 **MR. PATRICK KING:** I wouldn't have put it on  
28 YouTube. I don't have YouTube.

1                   **MR. JEFFREY LEON:** Well, let's see if it's you.

2                   **MR. PATRICK KING:** Other people can post things  
3 on YouTube.

4                                   (VIDEO PLAYBACK)

5                   **MR. JEFFREY LEON:** Now, do you remember?

6                   **MR. PATRICK KING:** I remember that there was a  
7 lot of stuff going on at that moment. We were -- you said this  
8 was February 12<sup>th</sup>?

9                   **MR. JEFFREY LEON:** I believe so.

10                  **MR. PATRICK KING:** I believe that this was also  
11 at the same time that the community had organized their own  
12 counter protest. Actually Ms. Catherine McKenney, the council  
13 member of Ottawa, encouraged people to come out and counter-  
14 protest, and they were leaving leaflets and things on trucks.  
15 So we couldn't determine whether or not these were true  
16 documents or not.

17                                 So I put out this post -- because it wasn't  
18 confirmed and there was no letterhead, there was no signature,  
19 there was no notoriety of who it came from. So I would assume  
20 that if the City Council or Ottawa was going to make this  
21 leaflet and pass it out, somebody would have put their name on  
22 it to give it some clout, to give it some importance.

23                                 Later on we found out that the - we were asked to  
24 move and then we said, okay.

25                   **MR. PATRICK KING:** Thank you. Mr. Clerk, can  
26 you put up HRF00001285.

27                                 Now, I understand this was the leaflet that was  
28 passed around. You'll see it's dated February 12<sup>th</sup> from Tamara

1 Lich; it speaks to Freedom Manifest and has the Freedom Convoy  
2 symbol on it. Can you scroll, please, and you'll see there the  
3 last two paragraphs it talks about re-positioning the trucks and  
4 the plan to start repositioning on Monday to consolidate the  
5 process. Now, is that the document you saw?

6 **MR. PATRICK KING:** I never saw this, no.

7 **MR. JEFFREY LEON:** But do you remember what the  
8 document looked like that you did see?

9 **MR. PATRICK KING:** It was a leaflet from the  
10 Mayor or something like that. I might be confused on this.  
11 I've never seen this.

12 **MR. JEFFREY LEON:** Now, while you were in Ottawa  
13 were you involved with a group of trucks that went out to the  
14 airport?

15 **MR. PATRICK KING:** Yeah.

16 **MR. JEFFREY LEON:** And you did slow rolls around  
17 the airport?

18 **MR. PATRICK KING:** We went for a ride, yeah.

19 **MR. JEFFREY LEON:** Well, how long were you at the  
20 airport?

21 **MR. PATRICK KING:** An hour, two hours.

22 **MR. JEFFREY LEON:** And were you doing slow rolls  
23 around the airport?

24 **MR. PATRICK KING:** We were abiding by the law,  
25 by the rules of the road; we did the speed limit; we did not  
26 impede emergency traffic; we just went for cruises.

27 **MR. JEFFREY LEON:** What was the purpose in your  
28 going?



1                   **MR. PATRICK KING:**    We were bored.

2                   **MR. JEFFREY LEON:**    I'm sorry?

3                   **MR. PATRICK KING:**    We were bored.

4                   **MR. JEFFREY LEON:**    And that you found  
5 interesting?

6                   **MR. PATRICK KING:**    Well, we went for a ride to  
7 see what Ottawa was like.

8                   **MR. JEFFREY LEON:**    Well, you spent two hours at  
9 the airport seeing what Ottawa was like?

10                  **MR. PATRICK KING:**    Well, to see what the airport  
11 was and just go for a drive. We were bored and it was cold.

12                  **MR. JEFFREY LEON:**    Do you recall speaking to Tom  
13 Marazzo before you went?

14                  **MR. PATRICK KING:**    I talked to Tom many a times.

15                  **MR. JEFFREY LEON:**    And did he have somebody  
16 accompany you to make sure what you were doing went okay?

17                  **MR. PATRICK KING:**    No, not that I know of.

18                  **MR. JEFFREY LEON:**    And did you by doing what you  
19 were doing there -- how many trucks were there?

20                  **MR. PATRICK KING:**    I don't know; all of them.

21                  **MR. JEFFREY LEON:**    All of what?

22                  **MR. PATRICK KING:**    All the trucks that were  
23 there; I don't know.

24                  **MR. JEFFREY LEON:**    How many came with you?

25                  **MR. PATRICK KING:**    They were all passenger  
26 vehicles; they were all cars.

27                  **MR. JEFFREY LEON:**    I see.

28                  **MR. PATRICK KING:**    There was never a commercial

1 vehicle with us.

2 **MR. JEFFREY LEON:** All right. And how many cars  
3 came with you?

4 **MR. PATRICK KING:** I don't know, 30, 40 maybe.

5 **MR. JEFFREY LEON:** And while you were doing what  
6 you were doing at the airport, would you agree with me that you  
7 slowed down other vehicles from accessing the airport?

8 **MR. PATRICK KING:** No, I do not. When you're  
9 going to the airport there's two lanes; when you're going to  
10 arrivals and departures, there's two lanes. We used one lane;  
11 we were in the one lane and there was always a lane open. So  
12 anybody who wanted to go in, they could use the other lane.

13 **MR. JEFFREY LEON:** Thank you. Mr. Clerk, can you  
14 put up HRF00000083.

15 Sorry, can you scroll the other way; you'll see  
16 it's on the Freedom Convoy letterhead, February 17<sup>th</sup>, reaffirming  
17 its commitment to peaceful demonstration. And if we look at the  
18 second paragraph:

19 "We do not support any form of hateful, rhetoric,  
20 divisive comments or calls for violence. We  
21 explicitly condemn anything of that nature. So  
22 let us be clear, we are a peaceful and lawful  
23 demonstration. We have heard about inappropriate  
24 comments being made by Pat King. Pat King does  
25 not speak for us. We expressly condemn any talk  
26 of violence from him or others. Pat King has the  
27 right like every other Canadian Citizen to  
28 protest peacefully."

1 Do you remember seeing this?

2 **MR. PATRICK KING:** I never saw it, but I heard  
3 about it; I knew about it.

4 **MR. JEFFREY LEON:** And do you know what they're  
5 referring to when they say ---

6 **MR. PATRICK KING:** Well, the reason is -- and  
7 I'm going to say it straight up, and I'm going to have to give a  
8 little bit of a brief background to that. I've been chasing the  
9 Government and exposing a lot of stuff of the overreach, the  
10 financial and economic hardships that have been happening. I  
11 have in my possession the document of the non-disclosure  
12 agreement between a young juvenile and a certain specific member  
13 of parliament. And when doing so, exposing also the \$42 billion  
14 infrastructure project that was stolen out of Alberta's hands  
15 and handed over to the Chinese Government. And the  
16 implementation of Chinese soldiers on Canadian soil. I have  
17 been absolutely harassed and degraded and defamed and  
18 discredited and character assassinated and these guys were  
19 getting attacked because of me. So when they put this out, I  
20 get it; they had to push me out and look at everybody and, you  
21 know, we don't want to anything to do with Pat King. I  
22 absolutely encouraged it, 100 percent. Put it out there that I  
23 don't have anything to do with this. Put it out there.  
24 GoFundMe wouldn't release their funds -- GoFundMe directly  
25 contacted them and said we're not going to release your funds if  
26 Patrick King's involved. This is how much target, like how much  
27 they're out to make sure that everything that touch, is ruined.

28 **MR. JEFFREY LEON:** Do you know what they're

1 referring to when they say, "Talk of violence, inappropriate  
2 comments"? Did you talk of violence?

3 **MR. PATRICK KING:** Not at all.

4 **MR. JEFFREY LEON:** Did you make any inappropriate  
5 comments?

6 **MR. PATRICK KING:** Not at all. Well, maybe. You  
7 know, I'm kind of a hothead. I kind of talk too much sometimes  
8 and that's -- I get that honestly by my mum. She's got the gift  
9 of the gab.

10 **MR. JEFFREY LEON:** Now, you recall that in  
11 Ottawa, there was a lot of honking, right?

12 **MR. PATRICK KING:** Oh, yeah.

13 **MR. JEFFREY LEON:** And were you involved in that  
14 honking?

15 **MR. PATRICK KING:** How? I didn't have a vehicle  
16 there. I didn't have a truck. What horn can I honk?

17 **MR. JEFFREY LEON:** And what did you think about  
18 it? Did you agree with it, encourage it, wish it didn't happen?

19 **MR. PATRICK KING:** Do what you want to do.

20 **MR. JEFFREY LEON:** I'm sorry.

21 **MR. PATRICK KING:** People are free to do what  
22 they wanted to do.

23 **MR. JEFFREY LEON:** Okay. Could you put up,  
24 Clerk, please, COM00000851.

25 (VIDEO PLAYBACK)

26 **MR. JEFFREY LEON:** That's what you thought, that  
27 it was hilarious that people couldn't sleep?

28 **MR. PATRICK KING:** When I look at now and I'm --

1 like, no, it wasn't funny. But if you know my persona and my  
2 character and the way I show myself, I laugh all the time.  
3 Life's a joke, laugh it off; it's kind of one of my biggest  
4 mottos. And I tend to laugh when I'm nervous. But at that  
5 point, it was kind of -- it was funny. You see, we'd been  
6 locked down for two years and people are complaining that they  
7 heard horns for 10 days. Did they remember what we went through  
8 for the last two years? What's a little bit of horns for 10  
9 days?

10 **MR. JEFFREY LEON:** And did you make any  
11 statements on social media to the effect that you wanted to form  
12 a new government and that you and the truckers would take power?

13 **MR. PATRICK KING:** No.

14 **MR. JEFFREY LEON:** And did you make any statement  
15 that -- in a video that, "We will be the new government. We  
16 will just take power and share it together"?

17 **MR. PATRICK KING:** Say that again.

18 **MR. JEFFREY LEON:** "We will be the new  
19 government. We will just take power and share it together."

20 **MR. PATRICK KING:** Do you have a video that I can  
21 reference?

22 **MR. JEFFREY LEON:** I don't have a video, no. I'm  
23 asking you if you ---

24 **MR. PATRICK KING:** No.

25 **MR. JEFFREY LEON:** --- said that on a video.

26 **MR. PATRICK KING:** I hate politics. I hate  
27 government so why would I want to be the new government?

28 **MR. JEFFREY LEON:** I'd like to show you now a

1 compilation of some of your videos ---

2 **MR. PATRICK KING:** Oh, I'm ready for this one.

3 **MR. JEFFREY LEON:** --- produced by ---

4 **MR. PATRICK KING:** Anti-Hate Canada and edited by  
5 a \$45M contract that Trudeau and his liberal government paid for  
6 to do this. It has been played over and over and over.

7 **MR. JEFFREY LEON:** Well, I don't think you've  
8 seen this compilation.

9 **MR. PATRICK KING:** Oh.

10 **MR. JEFFREY LEON:** It was produced by the Ontario  
11 -- or the Ottawa Police Service. It's OPS00007967. Can you  
12 please start it and stop it after the first video.

13 (VIDEO PLAYBACK)

14 **MR. PATRICK KING:** I know this video like there's  
15 no tomorrow. It's edited and spliced and fit to make the media,  
16 their narrative -- to show it in a negative context. So when  
17 you hear that, I had just got kicked out of the airport. I got  
18 denied my flight because I wasn't vaccinated after being told  
19 that I had been allowed to fly; I had a 72-hour window. And  
20 there's a video before this. Like, this is so ridiculous, take  
21 10-second clips and characterize somebody by it. But I'm  
22 waiting to defend myself on this one. And what I stated in this  
23 -- and I never say, "You're going to get shot." I never said  
24 that. I said, "You're going to catch a bullet," because, as we  
25 know, mental health is a big thing in Canada. It's kind of  
26 lime-lighted. You have mental health issues. One day somebody's  
27 going to have a breakdown and if you push people too far,  
28 especially denying them their flight, you never know who you're

1 going to get, and that person might have a mental breakdown.  
2 And what they're doing with their restrictions and these  
3 mandates, which are not laws, they're going to get that wrong  
4 person. And I said that because you're lucky it was me that day  
5 because I would never acted on that but if it had been somebody  
6 else -- and there's a lot of people are upset, lost a lot, and  
7 don't give a crap, and they're going to have a mental breakdown.

8 **MR. JEFFREY LEON:** Now, that was only a clip from  
9 the video.

10 **MR. PATRICK KING:** Yeah.

11 **MR. JEFFREY LEON:** Can you put up COM00000898,  
12 the full video.

13 **MR. PATRICK KING:** I want to say -- I'd just like  
14 to, like, give you a little bit of brief description to this.  
15 You ever get in an argument with your parents and you get mad  
16 and you say things you don't wish you said, like, you regret  
17 saying that? That's one of my moments. Yeah, it was  
18 inappropriate. Yeah, I should never had said it, but it was.

19 **MR. JEFFREY LEON:** Okay. Can you put up the  
20 document, please? And you can see there's the part that we saw:

21 "The only way that" -- and I'm going  
22 to say out it loud, "The only way that  
23 this is going to be solved is with  
24 bullets."

25 **MR. PATRICK KING:** No, you're. Okay, so this  
26 one:

27 "Someone's going to make you catch a  
28 bullet one day."

1                   That's one video. What you've done is you've put  
2 another video in there and said this part. And this part needs  
3 some major clarity ---

4                   **MR. JEFFREY LEON:** Okay.

5                   **MR. PATRICK KING:** --- because it's been edited  
6 and fit to make the narrative out like I'm some kind of looney  
7 and radical. But what it was is ---

8                   **MR. JEFFREY LEON:** Can I just stop you for a  
9 second? I want to just go through this whole ---

10                  **MR. PATRICK KING:** Sure.

11                  **MR. JEFFREY LEON:** --- statement and then I'll  
12 let you speak to it.

13                  **MR. PATRICK KING:** All right.

14                  **MR. JEFFREY LEON:** If we go down to the next  
15 paragraph:

16                                "You might want to change your name to  
17 Ishmael or drop a bunch of chains down  
18 the stairs and call yourself Chong  
19 Ching Ching Chang. Now you want to say  
20 the Indian culture and everything. The  
21 Natives' culture is a disgrace. It is  
22 100 percent every person who was born  
23 here in Canada, in North America, you  
24 are Indigenous. People don't realize  
25 that. If you were born of the land,  
26 you are Indigenous of the land. It's  
27 called depopulation of the Caucasian  
28 race or 19 the Anglo-Saxon. And that's



1                   what the goal is, is to depopulate the  
2                   Anglo-Saxon race because they are the  
3                   ones with the strongest bloodlines.  
4                   They are the ones with the strongest  
5                   bloodlines. They are the ones with the  
6                   strongest bloodlines."

7                   And then going down to the bottom:

8                   "I think I'm going to have a big  
9                   gathering at my house just for that.  
10                  And I'm going to film it. You're right,  
11                  cops will get shot."

12                  Now, did you make a video to that effect?

13                  **MR. PATRICK KING:** No. No, I -- can we go down  
14 so I can reference each sentence in this because I've dying to  
15 get this out.

16                  **MR. JEFFREY LEON:** Did you make any of those  
17 statements?

18                  **MR. PATRICK KING:** Can we go down so I can defend  
19 each ---

20                  **MR. JEFFREY LEON:** Yes, but ---

21                  **MR. PATRICK KING:** --- line?

22                  **MR. JEFFREY LEON:** --- answer my question.

23                  **MR. PATRICK KING:** You have four, if not five,  
24 videos that you've transcribed, one from over four years ago  
25 that's part of this. And they're taken out of context ---

26                  **MR. JEFFREY LEON:** Okay, I'd just ask you, sir --

27 -

28                  **MR. PATRICK KING:** --- so I need to defend myself

1 on that.

2 **MR. JEFFREY LEON:** I'll let you talk but just let  
3 me -- answer my question. Are those statements that you made?

4 **MR. PATRICK KING:** Those are statements that were  
5 said in a long line of online presence -- online podcasts that  
6 go along with the evidence -- or go along with the topic that I  
7 was discussing.

8 **MR. JEFFREY LEON:** Now.

9 **MR. PATRICK KING:** All right. Can we scroll  
10 down, please? Thank you. No, sorry, up. I apologize. A  
11 little bit more, please, right to the very beginning, number  
12 one.

13 All right, so we say:

14 "Trudeau, someone's going to 3 make you  
15 catch a bullet one day."

16 That's the airport incident. That's where I was  
17 mad. I was denied my flight after being told I can fly. And I  
18 got stuck in Toronto Pearson International Airport of which I  
19 actually regret saying that. I was mad.

20 The next one, the only way that I'm going to say  
21 it out loud -- "The only way that this is going to be solved is  
22 with bullets" -- that is taken directly out of context, 100  
23 percent.

24 **MR. JEFFREY LEON:** What was the context?

25 **MR. PATRICK KING:** The context was if you are  
26 Canadian and you want to exercise your political right to stand  
27 up and be freedom of protest and peaceful assembly, would you  
28 take it? Or are you going to allow it to become bullets?

1 Because if we keep going on the way we're going to be going on,  
2 that's the possible end game. It's a prediction.

3 **MR. JEFFREY LEON:** And you say at the end, "A  
4 massive revolution on a huge scale."

5 **MR. PATRICK KING:** If not, yeah. Things are  
6 wrong in this country, massively wrong.

7 **MR. JEFFREY LEON:** And what about the ---

8 **MR. PATRICK KING:** And this is me just  
9 interpreting what I'm seeing from an outside person saying this  
10 is what's going to happen if you do not make these t=governments  
11 be held accountable for what they're doing.

12 **MR. JEFFREY LEON:** And the next step ---

13 **MR. PATRICK KING:** Then we go down. You might  
14 want to change your name to Ishmael, drop a bunch of change down  
15 the stairs -- it's actually change, not chains. And I said that  
16 because there was a CSIS document put out -- I believe it was in  
17 2019 -- about the foreign economy, the foreign influence in our  
18 Canadian economy of a foreign government purchasing all our  
19 resources. And the CSIS guys were telling you, "Hey,  
20 something's wrong. Do you guys know that we're being bought  
21 out? Do you know that we're being infiltrated? Our economy's  
22 being destroyed.

23 And the comment was because it was China, Chinese  
24 influence.

25 **MR. JEFFREY LEON:** And the next paragraph?

26 **MR. PATRICK KING:** The next paragraph was -- I  
27 had to say this in my Court. They used this in my bail hearing.  
28 The Indian culture and everything, the Natives culture is a

1 disgrace. Never once was it said., It was said -- what I said  
2 prior to that is what the Canadian government has done to the  
3 First Nations people is an absolute disgrace in the way they're  
4 treated and the way they're ridiculed and not given the  
5 appropriate means to even have water. It's a disgrace.

6 **MR. JEFFREY LEON:** And the next paragraph?

7 **MR. PATRICK KING:** The next paragraph of the  
8 depopulation? Oh, this is a good one.

9 So there was a time the President of Iran,  
10 Mahmoud Ahmadinejad was his name, walked into a meeting at the  
11 United Nations with a bunch of binders and he dropped them down  
12 on the podium. And he started bringing out everything who was  
13 involve din 9-1-1. And people started scattering out.

14 And his words were, "We're not going to kill you  
15 with bullets. We're not going to blow you up with bombs. We're  
16 going to breed you out. We're going to get rid of the Anglo  
17 Saxon race because you think you're the proudest bloodline. And  
18 we are going to breed you out. We're going to flood your  
19 borders with immigrants. We're going to infiltrate your  
20 education, infiltrate your politics."

21 You don't understand. Like, the things that were  
22 going on around the world, and seeing these, I bring them up. I  
23 show the video and that's what it is.

24 **MR. JEFFREY LEON:** Okay. Can we go back to  
25 OPS00007967 and can you pick it up where you left off after the  
26 first video?

27 (VIDEO PLAYBACK)

28 **MR. PATRICK KING:** Very well edited. Congrats.

1           **MR. JEFFREY LEON:** Those are my questions.

2           **MR. PATRICK KING:** Thank you.

3           **COMMISSIONER ROULEAU:** First for cross--  
4 examination, the convoy organizers, please.

5           **MS. BATH-SHEBA VAN den BERG:** Good evening, Mr.  
6 Commissioner. Bath-Sheba Van den Berg, counsel for Freedom Corp  
7 and protesters. We have no questions for Mr. King. Thank you.

8           **COMMISSIONER ROULEAU:** Thank you. Next the  
9 Ottawa Residents Coalition, please.

10 **--- CROSS-EXAMINATION BY MR. PAUL CHAMP:**

11           **MR. PAUL CHAMP:** Mr. King, my name is Paul Champ  
12 and I'm a lawyer for the Ottawa Coalition of Residents and  
13 Businesses of Ottawa.

14           **MR. PATRICK KING:** You guys are the guys that got  
15 my bank account. That's still frozen, after nine months.

16           **MR. PAUL CHAMP:** Just give us a call.

17           **MR. PATRICK KING:** You took my kids' college  
18 tuition. I hope you're proud.

19           **MR. PAUL CHAMP:** Are you talking about the funds  
20 in your Alberta Treasury Branch?

21           **MR. PATRICK KING:** You're very familiar with my  
22 bank account.

23           **MR. PAUL CHAMP:** How many e-transfers ---

24           **MR. PATRICK KING:** I hope you're proud.

25           **MR. PAUL CHAMP:** How many e-transfers did you get  
26 into that account, Mr. King?

27           **MR. PATRICK KING:** All of them.

28           **MR. PAUL CHAMP:** So people across Canada are

1 donating for your children's, child's education fund? That's  
2 what it was for?

3 **MR. PATRICK KING:** No.

4 **MR. PAUL CHAMP:** Okay. You were raising money  
5 for the Freedom Convoy trip; is that right?

6 **MR. PATRICK KING:** For myself.

7 **MR. PAUL CHAMP:** Okay.

8 **MR. PATRICK KING:** If people wanted to donate  
9 they could.

10 **MR. PAUL CHAMP:** Okay. And so -- and they  
11 donated \$100,000 to you, is that right?

12 **MR. PATRICK KING:** No.

13 **MR. PAUL CHAMP:** How much?

14 **MR. PATRICK KING:** I have no idea.

15 **MR. PAUL CHAMP:** You don't know. So you don't  
16 know if was \$100,000 or not.

17 **MR. PATRICK KING:** I have no idea. You got my  
18 bank accounts frozen.

19 **MR. PAUL CHAMP:** Okay. Well, you can check the  
20 court records. You raised \$100,000 for yourself.

21 **MR. PATRICK KING:** Wow. So give me it back so I  
22 can live.

23 **MR. PAUL CHAMP:** No. I will ask you to be  
24 removed if this doesn't stop. You've been very good so far.  
25 Please.

26 **MR. PATRICK KING:** I'm sorry, sir.

27 **MR. PAUL CHAMP:** And I don't think you're  
28 helping. Just answer the questions and we'll get through this

1 properly.

2 **MR. PATRICK KING:** Sure.

3 **MR. PAUL CHAMP:** This isn't supposed to be a  
4 show. It's supposed to be a questions and answers and I realize  
5 you feel quite ---

6 **MR. PATRICK KING:** I apologize.

7 **MR. PAUL CHAMP:** --- strongly about things.

8 **MR. PATRICK KING:** I apologize. I did take that  
9 wrong. I apologize.

10 **MR. PAUL CHAMP:** Yeah, myself as well.

11 Mr. King, I'd just like to ask you about the 2019  
12 United We Roll convoy. You've told us that was a successful  
13 protest, is that right?

14 **MR. PATRICK KING:** One hundred (100) percent,  
15 yeah.

16 **MR. PAUL CHAMP:** It was. You organized a number  
17 of people, you and others -- Mr. Carrique and others. You got a  
18 number of trucks together including semi truck trailers. You  
19 came across Canada. You got a lot of media all the way across  
20 Canada, came through Ottawa and generated a lot of attention to  
21 your issues, correct?

22 **MR. PATRICK KING:** Yeah.

23 **MR. PAUL CHAMP:** Yeah, a successful protest.

24 **MR. PATRICK KING:** One hundred (100) percent.

25 **MR. PAUL CHAMP:** And then the ---

26 **MR. PATRICK KING:** And with Mr. Trudeau's  
27 involvement and the Freedom of Information where he sent 2000  
28 anti-protesters to come and slash our tires.

1                   **MR. PAUL CHAMP:** Right. So for the Freedom  
2 Convoy protest in February why did you stay for so long?

3                   **MR. PATRICK KING:** Why?

4                   **MR. PAUL CHAMP:** Yeah.

5                   **MR. PATRICK KING:** To exercise my democratic  
6 right to freedom of peaceful protest and freedom of assembly.  
7 Because I'm Canadian and I have that democratic right.

8                   **MR. PAUL CHAMP:** Now, Mr. King, where did you --  
9 you said you stayed at the Holiday Inn; is that right?

10                  **MR. PATRICK KING:** Yeah, for like four or five  
11 days, yeah.

12                  **MR. PAUL CHAMP:** And then where did you stay?

13                  **MR. PATRICK KING:** In Gatineau.

14                  **MR. PAUL CHAMP:** Okay. That's we had heard --  
15 Ms. Belton testified she thought you were staying in a hotel out  
16 of downtown. I guess the horns were getting to you downtown; is  
17 that why you changed hotels?

18                  **MR. PATRICK KING:** Not at all.

19                  **MR. PAUL CHAMP:** Why did you change hotels?

20                  **MR. PATRICK KING:** Because your community decided  
21 to pull the pin on lodgings and hotels for people and we were  
22 told they were no longer going to allow us to rent a room  
23 because the community had basically told the hotels, "If you  
24 support these guys and give them a room, you're going to be in a  
25 lot of trouble." And that's from the manager of the Holiday Inn  
26 who told me that.

27                                "So I'm sorry, Mr. King, we can't give you  
28 another room."



1 I said, "That's fine. I get it. No problem. It  
2 sucks to be you guys because you're making a killing. And the  
3 money that you guys are generating from all of us being here,  
4 it's probably the best for you guys to recoup those funds after  
5 two years of being shut down."

6 MR. PAUL CHAMP: Why didn't you go to the ARC  
7 Hotel or the Sheraton Hotel or the Swiss Hotel? There was lots  
8 of rooms there.

9 MR. PATRICK KING: I didn't need a hotel.

10 MR. PAUL CHAMP: Okay. And who paid for your  
11 hotels while you were in Ottawa, Mr. King?

12 MR. PATRICK KING: Me.

13 MR. PAUL CHAMP: Pardon me?

14 MR. PATRICK KING: Me.

15 MR. PAUL CHAMP: With the donations that you got  
16 to make the trip?

17 MR. PATRICK KING: Sure.

18 MR. PAUL CHAMP: Okay.

19 MR. PATRICK KING: That's -- are you speculating  
20 that, or ---

21 MR. PAUL CHAMP: No, I'm asking.

22 MR. PATRICK KING: Oh.

23 MR. PAUL CHAMP: You're the person I'm asking.

24 MR. PATRICK KING: It didn't sound like a  
25 question, that's all.

26 MR. PAUL CHAMP: It was a question, and ---

27 MR. PATRICK KING: Okay.

28 MR. PAUL CHAMP: --- are you answering yes,

1 that's how you ---

2 **MR. PATRICK KING:** Yeah, me. Yeah, I paid for  
3 it. Sorry.

4 **MR. PAUL CHAMP:** Paid for it, so I apologize.  
5 You got donations to come here and it's with those donations  
6 that you paid for the hotel rooms; is that right?

7 **MR. PATRICK KING:** Yes.

8 **MR. PAUL CHAMP:** And there's other people who  
9 were supporters of you who you also assisted in getting funds to  
10 pay for their hotel rooms. So in fairness, you were raising  
11 money to help others as well, correct?

12 **MR. PATRICK KING:** When I got money donated, I  
13 gave it away.

14 **MR. PAUL CHAMP:** Absolutely. And you were also  
15 working with Mr. Barber and the others about getting funds for  
16 other people that you helped bring to Ottawa; is that right?

17 **MR. PATRICK KING:** What do you mean, like, funds?

18 **MR. PAUL CHAMP:** Like, to pay for hotels for  
19 other people who were supporters.

20 **MR. PATRICK KING:** Anybody who needed help or  
21 anybody who needed money, I was open.

22 **MR. PAUL CHAMP:** But you ---

23 **MR. PATRICK KING:** You needed money, come talk to  
24 me, I would help you.

25 **MR. PAUL CHAMP:** And you would sometimes connect  
26 with Mr. Barber and Ms. Lich to see if they could assist funds  
27 as well; is that right?

28 **MR. PATRICK KING:** Well, I barely saw Tamara and

1 Chris.

2                   **MR. PAUL CHAMP:** You communicated regularly with  
3 Mr. Barber throughout.

4                   **MR. PATRICK KING:** Maybe text messages, yeah.

5                   **MR. PAUL CHAMP:** Yeah, through texts.

6                   **MR. PATRICK KING:** I never saw them.

7                   **MR. PAUL CHAMP:** Okay.

8                   **MR. PATRICK KING:** They were busy, man. These  
9 guys were like, wow. What they had going on over there, they  
10 could have it.

11                   **MR. PAUL CHAMP:** Did Mr. Barber or Ms. Lich ever  
12 talk to you about trying to get the truckers to lay off their  
13 horns?

14                   **MR. PATRICK KING:** They asked me to see what I  
15 could do, and I said, "Yeah, I'll do what I can."

16                   And that's when I put the posts out, and I  
17 believe they had been threatened with some injunction or  
18 something. I still wasn't very familiar at the time, but they  
19 said, "Do what you can to get the guys to stop," and I did. I  
20 put out a post. I said, "Stop honking horns," and actually, as  
21 part of my evidence package, that there's two videos. One of  
22 the videos actually has me on the street on that evening on  
23 Wellington stating, "Listen, you wouldn't know -- you have no  
24 idea where I'm at," and it was the most quietest, most eerie  
25 place because there was no more horns any more.

26                   **MR. PAUL CHAMP:** Now, with respect to the slow  
27 roll around the airport or to the airport, I take it that was  
28 just, you were bored, we heard that, but it was also a little

1 bit of a message to the City of Ottawa; is that right, that  
2 vehicles could move, move to other areas of the city if  
3 provoked?

4 **MR. PATRICK KING:** No.

5 **MR. PAUL CHAMP:** Was it -- why did you choose  
6 that day? Was it because the police had just done the raid at  
7 the -- at Coventry?

8 **MR. PATRICK KING:** No.

9 **MR. PAUL CHAMP:** You made it down to Coventry a  
10 number of times; is that right?

11 **MR. PATRICK KING:** Every day.

12 **MR. PAUL CHAMP:** Every day? You're a popular  
13 figure there, I gather?

14 **MR. PATRICK KING:** I wouldn't say popular.  
15 That's where I went and ate breakfast.

16 **MR. PAUL CHAMP:** And how -- you were there often.  
17 Do you know where the fuel was coming from into Coventry?

18 **MR. PATRICK KING:** From grateful patriots and  
19 Canadian citizens that were donating it.

20 **MR. PAUL CHAMP:** Sure, but, like, can you give us  
21 any specific names of those grateful patriots?

22 **MR. PATRICK KING:** Joe Smith, number one. I have  
23 no idea.

24 **MR. PAUL CHAMP:** You have no idea or you don't  
25 want to answer?

26 **MR. PATRICK KING:** I don't remember names. I  
27 meet people all day long, constantly. I don't remember names.  
28 If you have a specific person in particular that you want to

1 give me his name and I'll let you know if I know if I know him  
2 or if I conversed with them? Like, are you talking the guys  
3 that got arrested after they were told they weren't going to be  
4 arrested that were running fuel?

5 **MR. PAUL CHAMP:** You knew some of those guys?

6 **MR. PATRICK KING:** Yeah.

7 **MR. PAUL CHAMP:** You knew some of those guys  
8 personally?

9 **MR. PATRICK KING:** Yeah.

10 **MR. PAUL CHAMP:** Yeah, they were very upset.

11 **MR. PATRICK KING:** Well, look what you did. You  
12 told them, "We're not going to arrest --" not you, sorry, they  
13 were told they weren't going to get arrested, and then they left  
14 and they got pulled over down the road and got arrested or got  
15 charged, got a fine for whatever.

16 And I remember that night because the OPS came in  
17 and like, tried to flex or whatever, and these guys didn't know  
18 what was going on. They asked me to come down and I said, "I'm  
19 not coming down there. Not a chance. "

20 But I went down the next morning to make sure  
21 that calm, cool heads had prevailed. And on that morning,  
22 that's when the RCMP Special Response Task Force, well, they  
23 were staying at the Marriot and they came down. One of the  
24 officers came down to me, said, "Pat, you're not hot mic'd or  
25 anything?"

26 And I said, "No, I don't got nothing on." And  
27 "Why? Who are you?"

28 And he introduced himself and he said, "I just

1 want you to know about last night. That wasn't our call. And I  
2 want you to know that the RCMP, we met with legal and lawyers  
3 and that we are not going to do this to you guys because they  
4 can't give us the justification of why we should be evicting you  
5 or arresting people. So I'm sorry for what happened last  
6 night."

7 And I said, "Well, what do you mean by that?"

8 He's like, "Well, we fought with lawyers to give  
9 us justification of why we should be arresting these people.  
10 They couldn't give us a clear answer, so we're leaving."

11 I said, "You're leaving?"

12 He says, "Yeah. We're going to Windsor."

13 And they went to Windsor to break down whatever  
14 was happening at the border.

15 **MR. PAUL CHAMP:** So you were in communication  
16 with people who were involved at the Windsor blockade?

17 **MR. PATRICK KING:** No.

18 **MR. PAUL CHAMP:** So you talked to people who went  
19 ---

20 **MR. PATRICK KING:** The police officer was  
21 leaving.

22 **MR. PAUL CHAMP:** Oh, the police? So they ---

23 **MR. PATRICK KING:** So they were going, they were  
24 leaving Ottawa ---

25 **MR. PAUL CHAMP:** Right.

26 **MR. PATRICK KING:** --- because the lawyers  
27 couldn't give them a justification of arresting people ---

28 **MR. PAUL CHAMP:** Right.

1                   **MR. PATRICK KING:** --- and they said, "We're not  
2 going to break the law." So they, whoever is in charge of them  
3 sent them to Windsor.

4                   **MR. PAUL CHAMP:** So the people who got tickets  
5 that night and arrested were upset. You were upset by that, and  
6 that's one of the reasons why you organized the slow roll around  
7 the airport of Ottawa; is that ---

8                   **MR. PATRICK KING:** Not at all, no.

9                   **MR. PAUL CHAMP:** What did you do because you were  
10 upset about that?

11                   **MR. PATRICK KING:** I went and made sure everybody  
12 was calm and cool and everybody was understanding, like, these  
13 guys got a job to do. Understand that was rude, that was  
14 ignorant, and just be more cautious when you're dealing with the  
15 police.

16                   **MR. PAUL CHAMP:** Now, Mr. King, you could not and  
17 did not know everyone who was in Ottawa during that protest,  
18 right?

19                   **MR. PATRICK KING:** No, there was millions of  
20 people.

21                   **MR. PAUL CHAMP:** Well, thousands anyway, for  
22 sure.

23                   **MR. PATRICK KING:** Hundreds of thousands. Let's  
24 not undersell it. There was a lot of people here.

25                   **MR. PAUL CHAMP:** Well, just -- we'll agree to  
26 disagree there weren't hundreds of thousands, but you -- it was  
27 a bit of a dangerous situation with all those people downtown;  
28 would you agree?

1           **MR. PATRICK KING:** Dangerous in what way?

2           **MR. PAUL CHAMP:** Well, dangerous that you don't  
3 know what people might have in their trucks, you don't know what  
4 they might do, they are very upset, they're very angry. Was  
5 that a dangerous situation for downtown?

6           **MR. PATRICK KING:** Not at all.

7           **MR. PAUL CHAMP:** Okay.

8           **MR. PATRICK KING:** I met the most loving, most  
9 caring, most loving people, Canadian citizens. Everywhere you  
10 went, you were getting hugs, you were getting handshakes, and --  
11 -

12           **MR. PAUL CHAMP:** Well then, why did you ---

13           **MR. PATRICK KING:** --- nobody was violent.

14           **MR. PAUL CHAMP:** Why did you need security then  
15 yourself? It was so dangerous that you yourself needed  
16 security; isn't that right?

17           **MR. PATRICK KING:** Because the Liberal left  
18 trolls were threatening my life.

19           **MR. PAUL CHAMP:** Okay. So that was dangerous,  
20 right?

21           **MR. PATRICK KING:** For me.

22           **MR. PAUL CHAMP:** Just for you? You were the only  
23 person in downtown Ottawa who was at risk; is that right?

24           **MR. PATRICK KING:** Actually, I was the most  
25 highly protected person in Ottawa because we had -- I think they  
26 had delegated eight police officers to follow me around  
27 everywhere.

28           **MR. PAUL CHAMP:** So Mr. King, we've heard



1 evidence that many federal elected officials, the mayor of  
2 Ottawa, had received death threats. We've heard evidence that  
3 someone was actually arrested with firearms who was coming to  
4 Ottawa who had been making threats about ---

5 **MR. PATRICK KING:** Do you have a record of that?  
6 Do you have a ---

7 **MR. PAUL CHAMP:** I am asking the questions, Mr.  
8 King.

9 **MR. PATRICK KING:** Sorry.

10 **MR. PAUL CHAMP:** So but you would agree with me  
11 that it was probably a dangerous situation for elected officials  
12 in Ottawa?

13 **MR. PATRICK KING:** It was a dangerous place for  
14 us. People were dropping marbles from high rises. They were  
15 throwing eggs. Citizens of Ottawa were threatening to run us  
16 over.

17 **MR. PAUL CHAMP:** Mr. King. You yourself said  
18 that someone who is maybe stressed out because of lockdowns and  
19 so forth might be compelled to shoot Mr. Trudeau. So you  
20 understood ----

21 **MR. PATRICK KING:** That was months before the  
22 convoy.

23 **MR. PAUL CHAMP:** --- recognized that that was a  
24 risk, right?

25 **MR. PATRICK KING:** That was months before the  
26 convoy.

27 **MR. PAUL CHAMP:** Oh, so but everyone was all --  
28 they were all settled down by the time the convoy came and there

1 was no threats to anyone?

2 **MR. PATRICK KING:** I've never seen anything more  
3 loving and peaceful in my life. It was Woodstock.

4 **MR. PAUL CHAMP:** So the only person who's at risk  
5 in Ottawa was Pat King? All the other threats to anyone else in  
6 Ottawa were all fake; is that right?

7 **MR. PATRICK KING:** I don't know. I can't speak  
8 on those. Do you know my lawyer has been given death threats  
9 and bomb scares because she represents me? Do you know that my  
10 friends have been -- their children have been threatened because  
11 of -- from Ottawa? Do you know that -- and I hate to say this -  
12 - but this town is full of a bunch of people who really don't  
13 like people who speak out.

14 **MR. PAUL CHAMP:** I disagree, Mr. King. Ottawa has  
15 dozens of large protests, many much larger than the one that you  
16 organized, every single year.

17 **MR. PATRICK KING:** I've been here for them.

18 **COMMISSIONER ROULEAU:** I'm not sure that was a  
19 question so.

20 **MR. PAUL CHAMP:** Well, Mr. Commissioner ---

21 **MR. PATRICK KING:** Can I just ask ---

22 **MR. PAUL CHAMP:** I'll just note -- Mr.  
23 Commissioner, I'll just note for the record that the people of  
24 Ottawa got one morning in this proceeding. We've had a week of  
25 all of these convoy organizers given a full platform to say  
26 whatever they want. The people in Ottawa respect the right to  
27 protest, and these folks are getting their time to tell -- say  
28 everything they want ---

1 COMMISSIONER ROULEAU: You'll get ---

2 MR. PATRICK KING: Can I say one -- sorry.

3 COMMISSIONER ROULEAU: I'm sorry, just ---

4 MR. PATRICK KING: Sorry.

5 COMMISSIONER ROULEAU: --- I'm going to stop  
6 this. You'll get -- hey, hey. Please, could you ask -- have  
7 him -- I'm going to take a break while you're removed.

8 THE REGISTRAR: The Commission is in recess. La  
9 commission est levée.

10 --- Upon recessing at 5:56 p.m.

11 --- Upon resuming at 6:02 p.m.

12 THE REGISTRAR: Order. À l'ordre. The  
13 Commission is reconvened. La commission est reprend.

14 --- MR. PATRICK KING, Resumed:

15 COMMISSIONER ROULEAU: Okay. Unfortunate event,  
16 but if we can now get back and complete the -- today's  
17 proceedings.

18 Next is the Ottawa Police Service.

19 MS. JESSICA BARROWS: The Ottawa Police Service  
20 has no questions. Thanks very much, Commissioner.

21 COMMISSIONER ROULEAU: Okay. The Ontario  
22 Provincial Police?

23 MR. CHRISTOPHER DIANA: The OPP has no questions.  
24 Thank you, Commissioner.

25 COMMISSIONER ROULEAU: Counsel for former Chief  
26 Sloly?

27 MR. TOM CURRY: We don't have any questions.  
28 Thanks.

1                   **COMMISSIONER ROULEAU:** The Government of Canada?

2                   **MS. KATHLEEN TURNER:** Thank you, Commissioner.

3                   **--- CROSS-EXAMINATION BY MS. KATHLEEN TANNER:**

4                   **MS. KATHLEEN TANNER:** Mr. King, my name is  
5 Kathleen Tanner and I'm counsel for the Government of Canada. I  
6 just have one short area of questions based on some -- a video  
7 that had been played earlier for you, and it was a video that I  
8 believe had been recorded on February 12<sup>th</sup> after some information  
9 had come through about some pamphlets or some letters that had  
10 been passed around to the drivers. And you had made a video  
11 recording telling other drivers that it was a lie, that it was  
12 fake news, to hold the ground, stand the line. And later on in  
13 that video, and if you'd like, we could bring it up, or we could  
14 just walk through it. I understand that you referenced the --  
15 the information that's at stake there is a letter which mentions  
16 Ms. Lich's name. And later on in that video, you mention that  
17 Ms. Lich would never do something like this, and you knew her  
18 well, and you had good communications, and so this wasn't going  
19 to be something coming from her.

20                   So my question is, did you have any meetings with  
21 the City of Ottawa while you were in Ottawa?

22                   **MR. PATRICK KING:** No, I did not.

23                   **MS. KATHLEEN TANNER:** And were you aware of any  
24 meetings that Ms. Lich or other representatives of the convoy  
25 may have had with anybody from Ottawa?

26                   **MR. PATRICK KING:** No. I tended to stay away  
27 from it.

28                   **MS. KATHLEEN TANNER:** And prior to releasing this

1 video, did you make any attempts to reach out to Ms. Lich to  
2 confirm whether or not this letter may or may not be accurate?

3 **MR. PATRICK KING:** I may or may have, and I  
4 believe that we were all kind of confused. We didn't know if it  
5 was legitimate. So there was the initial, oh, like, this is not  
6 a true statement to -- they vetted it -- the document, and then  
7 we rechanged our statement and said, okay.

8 **MS. KATHLEEN TANNER:** So I guess my question is,  
9 and then earlier when you were speaking to my friend from  
10 Commission counsel, you had said you were uncertain about the  
11 truthfulness of that document and that's why you had released  
12 the video.

13 **MR. PATRICK KING:** Right, because I would assume  
14 that if these people are going to put these letters out and that  
15 they're coming from a delegated person that has, like, a high  
16 position, there would be a name or a signature or an emblem  
17 representing who it's from. And from my knowledge, it -- we  
18 didn't know where it came from.

19 **MS. KATHLEEN TANNER:** So I guess that's my  
20 question. It's is it a pattern for you to release videos like  
21 this without first confirming the ---

22 **MR. PATRICK KING:** Yeah ---

23 **MS. KATHLEEN TANNER:** --- authenticity of the  
24 information ---

25 **MR. PATRICK KING:** --- yeah, I had a habit of  
26 that. I would act without knowledge, but there is an absolute  
27 disconnect between myself and their rooms that they had. And I  
28 acted alone.

1                   **MS. KATHLEEN TANNER:** Okay. That's all my  
2 questions. Thank you, and thank you, Mr. Commissioner.

3                   **COMMISSIONER ROULEAU:** Okay. Thank you.

4                   Next is the CCLA.

5                   **MS. EWA KRAJEWSKA:** Good evening, Commissioner  
6 and Mr. King. My name's Ewa Krajewska on behalf of the Canadian  
7 Civil Liberties Association and I don't have any questions for  
8 Mr. King. Thank you.

9                   **COMMISSIONER ROULEAU:** Thank you.

10                   Now the Democracy Fund or Citizens for Freedom.

11                   **MR. ANTOINE D'AILLY:** Commissioner, Antoine  
12 D'Ailly for Citizens for Freedom. No questions for this  
13 witness. Thank you.

14                   **COMMISSIONER ROULEAU:** Thank you.

15                   Okay. And now I apologize, I've forgotten your  
16 name, counsel for Mr. King. Any questions? Anything that  
17 concerns you about the documentation or you want to put to your  
18 client?

19                   **MS. NATASHA CALVINHO:** Thank you, no. Natasha  
20 Calvinho for Mr. King. I don't have any questions,  
21 Commissioner.

22                   **COMMISSIONER ROULEAU:** Okay. Sorry, I forgot  
23 your name, so I apologize for that.

24                   Okay. Any re-examination? No?

25                   Okay. Well, that completes your evidence, Mr.  
26 King, and you are free to go.

27                   **MR. PATRICK KING:** Can I ask for one thing?  
28 There is some evidence that I have given to the Commission that

1 needs to be brought out, that I would appreciate it that it got  
2 to the public and they got to see it.

3 **COMMISSIONER ROULEAU:** I think that that should  
4 have been done when -- I think at the end of the examination.  
5 Now I'm not sure at this point if there's something in  
6 particular you want to say, of course, go ahead, because it's --  
7 despite what some may say, we're just trying to get at the  
8 bottom of all of this.

9 **MR. PATRICK KING:** Absolutely. And I want to  
10 show the Canadian citizens and the like that they need to be  
11 shown and how caring and compassionate towards the City of  
12 Ottawa we actually were and how we -- these videos will -- like  
13 I said, what I've been shown as racist and all this stuff, and  
14 taken out of context, nobody ever showed the positives. And  
15 that was the police officers who were right with us, saying  
16 thank you. There was residents that were saying thank you. The  
17 community in a whole, the community of Ottawa that came together  
18 and respected us and understood that, we hear you. I have  
19 nothing against the City of Ottawa. That's not who we were here  
20 to talk to. I understand that people were -- I guess felt that  
21 we were here targeting them; that wasn't the case. And to  
22 Ottawans, to people who live here, to the City Council members,  
23 to the police and all that, we weren't bad people, sir. We were  
24 Canadian citizens who -- we have shown the Canadian pride and we  
25 are nice and we are good people; we're good people.

26 **COMMISSIONER ROULEAU:** Well, if it's any  
27 consolation, there's been evidence about the various Convoy  
28 participants on all these issues and there are more witnesses

1 coming. We're just trying to put out a whole picture. I'll  
2 weigh it all at the end and the evidence will be there and I'm  
3 going to make some findings and prepare a report

4 **MR. PATRICK KING:** Thank you very much.

5 **COMMISSIONER ROULEAU:** But there are others  
6 coming. So with that, I will adjourn for the day. We have a  
7 big day tomorrow. It will be -- I think it will go a little  
8 later even than most. I hope we'll have no difficulties  
9 tomorrow because that just slows up the process. But we'll be  
10 back tomorrow at 9:30.

11 **THE REGISTRAR:** The Commission is adjourned; La  
12 commission est ajournée.

13 --- Upon adjourning at 6:10 p.m.

14

15 **C E R T I F I C A T I O N**

16


17 I, Wendy Clements, a certified court reporter, hereby certify  
18 the foregoing pages to be an accurate transcription of my  
19 notes/records to the best of my skill and ability, and I so  
20 swear.

21

22 Je, Wendy Clements, une sténographe officielle, certifie que les  
23 pages ci-hautes sont une transcription conforme de mes  
24 notes/enregistrements au meilleur de mes capacités, et je le  
25 jure.

26

27



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Wendy Clements