

IN THE FEDERAL COURT OF APPEAL

B E T W E E N :

MINISTER OF NATIONAL DEFENCE

Applicant

- and -

MICHELLE D. DOUGLAS

Respondent

AFFIDAVIT OF BARBARA H.J. TAIT

I, BARBARA H.J. TAIT, of the City of Toronto in the Municipality of Metropolitan Toronto, law clerk, make oath and say as follows:

1. I am employed as a law clerk in the Toronto Regional Office of the Department of Justice of Canada, solicitors for the Applicant the Minister of Defence. I am assisting Ms. Debra M. McAllister, counsel having carriage of this file, and as such have knowledge of the matters hereinafter deposed to.

2. The Respondent, Michelle D. Douglas ("Douglas") filed a complaint pursuant to s.42 of the Canadian Security Intelligence Service Act, R.S.C. 1985, c. C-23 (the "Act"). Her complaint was investigated by the Canadian Security Intelligence Review Committee ("SIRC") at hearings held on April 3, 4 and 20, 1990.

3. Section 48(1) of the Act provides that investigations into such complaints "shall be conducted in private".

4. I have reviewed portions of the transcript of the SIRC's investigation into the complaint filed by Douglas. The investigation was, in fact, conducted in private in accordance with the requirements of s.48(1) of the Act.

Court File No: A-514-90

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of Canada

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