

IN THE MATTER OF:

**Commission of Inquiry into the Circumstances
Surrounding the Death of Phoenix Sinclair**

**AFFIDAVIT OF SCOTT CLARK
AFFIRMED APRIL 4, 2012**

**The Canadian Union of Public Employees
703 – 275 Broadway Avenue
Winnipeg, MB
R3C 4M6
Phone: 942-0343
Fax: 956-7071**

William M. Sumerlus

**IN THE MATTER OF: Commission of Inquiry into the Circumstances
Surrounding the Death of Phoenix Sinclair**

AFFIDAVIT OF SCOTT CLARK

I, SCOTT CLARK, of the City of Winnipeg, in the Province of Manitoba,

MAKE OATH AND SAY AS FOLLOWS:

1. I am a Staff Representative with the Canadian Union of Public Employees (CUPE). In my capacity as a Staff Representative I assist CUPE Local 2153, the Bargaining Agent for a group of employees called Teaching Support Workers, employed by Winnipeg Child and Family Services (CFS). I am responsible for bargaining and enforcing the collective agreement and therefore the terms and conditions of employment for these employees.

2. Accordingly, I have personal knowledge of the facts and matters set out herein, except where I indicate that such facts and/or matters are based on information and belief, in which case I believe them to be true.

3. Teaching Support Workers are employed by Winnipeg Child and Family Services to provide in part, in home support with childcare and basic household tasks for parents who have come into contact with CFS.

4. It is essential for Teaching Support Workers to be able to establish a trusting relationship with their clients.

5. In order to establish this sort of relationship, clients of Teaching Support Workers must be secure in the anonymity of their relationship.

6. I am advised and believe that the clients of Teaching Support Workers may include parents who are very suspicious of the Child Welfare System.

7. I am further advised and believe that any publication of the identity or testimony of a Teaching Support Worker will jeopardize their anonymity and therefore their ability to establish trusting relationships with clients in the future.

8. I made this Affidavit in good faith.

AFFIRMED BEFORE me at the City of)
 Winnipeg, in the Province of Manitoba, this)
 4th day of April, 2012.)
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 A Notary Public in and for the Province
 of Manitoba



 SCOTT CLARK