

IN THE MATTER OF:

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

AFFIDAVIT OF ALISON McCULLOUGH-BUTCHART

Phoenix Sinclair Inquiry
RECEIVED
APR 04 2012

GANGE GOODMAN & FRENCH

Barristers & Solicitors
760 - 444 St. Mary Avenue
Winnipeg, MB R3C 3T1
William S. Gange
(204) 953-5401
File No. 15729 WSG

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

AFFIDAVIT OF ALISON McCULLOUGH-BUTCHART

I, Alison McCullough-Butchart of the City of Winnipeg in the Province of
Manitoba, Lawyer,

MAKE OATH AND SAY THAT:

1. I am a lawyer with the firm Gange Goodman & French, in Manitoba and, as such, have personal knowledge of the matters and facts hereinafter deposed to by me, except where same are stated to be based on information and belief, in which case I do verily believe them to be true.
2. W.S. Gange of Gange Goodman & French has been retained by the Government of Manitoba to provide independent legal advice to various parties who may have information with respect to the circumstances surrounding the death of Phoenix Sinclair.
3. Mr. Gange has attended with various parties during the interview process conducted by Commission counsel.
4. I am aware that two of the clients of Mr. Gange have been identified by Commission counsel as SOR #5 and SOR #6.

5. I am advised by Mr. Gange and do verily believe that during the interview process conducted by Commission counsel with both witnesses SOR #5 and SOR #6, the individuals provided information to Commission counsel that they had provided information in compliance with Section 18 of *The Child and Family Services Act*.

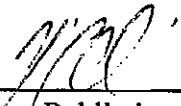
6. I am advised by Mr. Gange and do verily believe that witnesses SOR #5 and SOR #6 do not consent to the disclosure of their identities during the Commission hearings.

7. I am advised by Mr. Gange and do verily believe that Commission counsel has indicated to Mr. Gange that SOR #5 and SOR #6 are expected to be witnesses at the hearing stage of the Inquiry.

8. I am advised by Mr. Gange and do verily believe that Mr. Gange has concerns that the individuals identified as SOR #5 and SOR #6 may suffer significant emotional stress if their identities are disclosed or if they are required to testify in public.

9. I make this Affidavit in good faith.

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



ALISON McCULLOUGH-BUTCHART