**fIN THE MATTER OF:** 

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

## AFFIDAVIT OF BRUCE RIVERS

I, BRUCE RIVERS, of the City of Toronto, in the Province of Ontario,

## MAKE OATH AND SAY AS FOLLOWS:

- 1. I have personal knowledge of the facts and matters set out herein, except where I indicate that such facts and matters are based on information and belief, in which case I believe them to be true.
- 2. I make this affidavit supplemental to the affidavit I swore on March 30, 2012.
- 3. My previous affidavit did not indicate the purpose for which the evidence was given. I make this affidavit to explain the purpose for which it was given.
- 4. Prior to swearing my first affidavit, I was advised by counsel for the Authorities and ANCR, Luke Bernas, of the nature of the Notice of Motion and relief sought by the MGEU regarding the confidentiality of social workers identities who would be testifying at the Hughes Inquiry. I was further advised by Mr. Bernas that his clients believed that my experience in the field of child protection was relevant to the MGEU publication ban motion.
- 5. I have reviewed the MGEU notice of motion and I agree with the Authorities and ANCR that my evidence is relevant to the issue of media coverage of child death reviews and its impact on the child welfare system.
- 6. I have also reviewed the Notices of Motion filed by the Intertribal Child and Family Services and the Authorities and ANCR relating to the request for a publication

ban. I can advise that the evidence I provided in my first affidavit is also relevant to those motions.

- 7. Accordingly, my affidavit sworn March 30, 2012 is in support of all three of the above referenced motions.
- 8. I make this affidavit in good faith.

SWORN/AFFIRMED before me in		
the City of Toronto, in the Province		
of Ontario, on the	day of	
April	, 2012	Š

A Commissioner for taking oaths in and for the Province of Ontario

"P. Vonla Kotonlas"

LSUC No. 54797 T

IN THE MATTER OF:

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

AFFIDAVIT OF BRUCE RIVERS
SWORN/AFFIRMED THE | DAY | 2012

D'ARCY & DEACON LLP Barristers and Solicitors 2200 – One Lombard Place Winnipeg, Manitoba R3B 0X7

## HAROLD COCHRANE / KRIS SAXBERG

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