

Re a sealing order made by Justice Stephen Paull on October 26, 2016 (Sealed Package 2911-16-158)

Order Varying Sealing Order

Pursuant to section 487.3(4) of the *Criminal Code*

As requested by Crown Fraser Kelly, the attached sealing order is varied as follows.

The term currently reads:

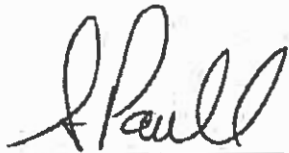
The Sealing Order contains an exception permitting Police Officers and Crown Counsel to review, discuss and rely on copies of the Information to Obtain, associated appendixes or Reports to Justice for purposes of further investigation and prosecution. This exception is necessary to allow the continuation of the investigation.

The following is hereby added:

"Further, the Crown may disclose the copied material in accordance with R.v. Stinchcombe, S.C.C., and in the course of the prosecution."

This amendment is to be affixed to the outside of the related sealed package. The Crown may have to a copy of this signed variation order. All other terms of the sealing order are unchanged and remain in force.

Dated at Woodstock, Ontario on November 23, 2016



The Honourable Justice Stephen Paull
Ontario Court of Justice

Packet Number 2911-16-153
Numéro de paquet

WHEREAS Production Orders pursuant to Sec. 487.014 of the Criminal Code of Canada was issued on
ATTENDU QUE (describe nature of warrant, order or authorization / décrire le mandat, l'ordonnance, ou l'autorisation) a été émis(e)

this 26th day of October yr. 2016 relating to as the College of Nurses of Ontario
le jour de an relativement à (describe place if applicable / décrire l'endroit selon le cas)

UPON THE APPLICATION OF Detective Constable Tim Pinder
SUR LA DEMANDE DE (name of applicant/informant / nom du demandeur/déclarateur)
of the Southwest Region Police Officer
de(du) (region / région) (occupation / profession)

AND WHEREAS an application was made for an order prohibiting access to and the disclosure of any information
ET ATTENDU QUE la demande a été présentée d'interdire, par ordonnance, l'accès à l'information relative
relating to the said Production Orders ; ainsi que la communication de cette information;
audit (à la dite) (warrant, order or authorization / mandat, ordonnance, ou autorisation)

AND BEING SATISFIED THAT the ends of justice would be subverted by the disclosure of any information, for (a) reason(s) referred to in s. 487.3(2), or that the information might be used for an improper purpose;
ET ÉTANT CONVAINCU(E) QUE la communication de cette information, pour l'une ou l'autre des raisons mentionnées au par. 487.3(2), serait préjudiciable aux fins de la justice, ou que l'information pourrait être utilisée à des fins illégitimes;

AND that this (these) reason(s) outweigh(s) the importance of access to the information;
ET que cette ou ces raisons l'emportent sur l'importance de l'accès à l'information;

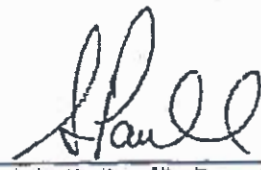
IT IS ORDERED that the access to and the disclosure of information or portions of information relating to this said warrant, order or authorization is hereby prohibited, subject to the following terms and conditions:
IL EST ORDONNÉ par les présentes que l'accès à la totalité ou à une partie quelconque de l'information relative audit mandat ou à la dite ordonnance ou autorisation est interdit, de même que la communication totale ou partielle de ladite information, sous réserve des modalités suivantes :
(set out terms and conditions, if any / préciser les modalités, le cas échéant)

The Sealing Order contains an exception permitting Police Officers and Crown Counsel to review, discuss and rely on copies of the information to Obtain, associated appendixes or Reports to Justice for purposes of further investigation and prosecution. This exception is necessary to allow the continuation of the investigation.

The undersigned has placed the following documents or portions thereof filed in support of the application for the said warrant, order or authorization in a packet and sealed the said packet immediately on determination of the application:
La personne soussignée a placé la totalité ou une partie des documents suivants, qui ont été déposés à l'appui de la demande dudit mandat ou de la dite ordonnance ou autorisation, dans un paquet sur lequel elle a mis les scellés dès que la décision relative à cette demande a été prise :

IT IS FURTHER ORDERED that this said packet be kept in the custody of the court in a place to which the public has no access (or other place as authorized) and not be dealt with except in accordance with the terms and conditions set out above or until further order of the court.
IL EST EN OUTRE ORDONNÉ que ledit paquet soit gardé par le tribunal en un lieu auquel le public n'a pas accès (ou en tout autre lieu autorisé) et qu'il ne peut en être disposé que conformément aux modalités fixées ci-dessus ou que jusqu'à nouvelle ordonnance du tribunal.

Dated this 26th day of October yr. 2016
Fait ce jour de an
at the City of Woodstock
à(au) de
in the Province of Ontario / dans la province de l'Ontario



Judge/Justice of the Peace / Juge/Juge de paix
S.E.J. Paul

2911-16-153

COPY

Woodstock Police Service
INFORMATION TO OBTAIN A PRODUCTION ORDER
DÉNONCIATION EN VUE D'OBTENIR UNE ORDONNANCE DE COMMUNICATION
SUPERIOR/ONTARIO COURT OF JUSTICE
COUR SUPÉRIEURE DE JUSTICE/DE JUSTICE DE L'ONTARIO

CANADA
PROVINCE OF ONTARIO
PROVINCE DE L'ONTARIO

Form / Formule 5.004
Subsection / paragraphe 487.014(2), 487.015(2),
487.016(2), 487.017(2) and / et 487.018(3)
of the Criminal Code / du Code criminel

Southwest / Sud-Ouest
(Region / Région)

Case/File No. / N° du cas/dossier

This is the information of Detective Constable Tim PINDER of The City of Woodstock
La présente constitue la dénonciation de (name of peace officer or public officer / nom de l'agent de la paix ou du fonctionnaire public) de

("the informant"),
ci-après appelé(e) « le dénonciateur ».

The informant says that they have reasonable grounds to suspect (or, if the application is for an order under section 487.014 of the Criminal Code, reasonable grounds to believe)
Le dénonciateur déclare qu'il a des motifs raisonnables de soupçonner (ou, si la demande vise à obtenir une ordonnance en vertu de l'article 487.014 du Code criminel, de croire) que les conditions suivantes sont réunies :

- (a) that an offence has been or will be committed under
a) une infraction prévue à

CC Sec. 235 (1) First Degree Murder x 8 and CC Sec. 239 (1) (b) Attempted Murder x 6 ;
(specify the provision of the Criminal Code or other Act of Parliament / préciser la disposition du Code criminel ou de l'autre loi fédérale)

a été ou sera commise;

AND / ET

- (b) (if the application is for an order under section 487.014 of the Criminal Code) that (specify the document or data)
b) (si la demande vise à obtenir une ordonnance en vertu de l'article 487.014 du Code criminel) (préciser les données)
- Janine HOOVER, Conestoga College, 299 Doon Valley Dr., Kitchener ON
- Deb STOCKMANN, Fanshawe College, E1012, 1001 Fanshawe College Blvd., London ON
- Paul BRENNAN, The College of Nurses of Ontario, 101 Davenport Rd., Toronto ON

is in the possession or control of See Appendix B and will afford evidence respecting the
sont en la possession de (name of the person / nom de la personne) ou à sa disposition et fourniront une

commission of the offence.
preuve concernant la perpétration de l'infraction.

OR / OU

- (b) (if the application is for an order under section 487.015 of the Criminal Code) that the identification of a device or
b) (si la demande vise à obtenir une ordonnance en vertu de l'article 487.015 du Code criminel) l'identification de tout
person involved in the transmission of _____
dispositif ayant servi à la transmission de (specify the communication / préciser la communication)

will assist in the investigation of the offence and that (specify the transmission data)
ou de toute personne y ayant participé sera utile à l'enquête relative à l'infraction et (préciser les données de transmission)

that is in the possession or control of one or more persons whose identity is unknown will enable that identification.
sont en la possession ou à la disposition d'une ou de plusieurs personnes—dont l'identité n'est pas connue—et permettront cette identification.

OR / OU

- (b) (if the application is for an order under section 487.016 of the Criminal Code) that (specify the document or data)
b) (si la demande vise à obtenir une ordonnance en vertu de l'article 487.016 du Code criminel) (préciser les données de transmission)

is in the possession or control of _____
sont en la possession de (name of the person / nom de la personne)

the offence.
l'enquête relative à l'infraction.

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and will assist in the investigation of

ou à sa disposition et seront utiles à
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GREFFIER DE LA COUR
ONTARIO COURT OF JUSTICE
COUR DE JUSTICE DE L'ONTARIO**

INFORMATION TO OBTAIN A PRODUCTION ORDER
DÉNONCIATION EN VUE D'OBTENIR UNE ORDONNANCE DE COMMUNICATION

Form / Formule 5.004
Subsection / paragraphe 487.014(2), 487.015(2),
487.016(2), 487.017(2) and / et 487.018(3)
of the Criminal Code / du Code criminel
Page 2

- (b) (if the application is for an order under section 487.017 of the Criminal Code) that (specify the tracking data)
b) (si la demande vise à obtenir une ordonnance en vertu de l'article 487.017 du Code criminel) (préciser les données de localisation)

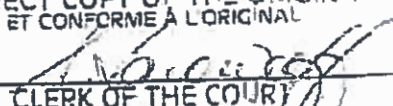
is in the possession or control of _____ and will assist in the investigation of
sont en la possession de _____ (name of the person / nom de la personne) ou à sa disposition et seront utiles à
the offence.
l'enquête relative à l'infraction.

- (b) (if the application is for an order under section 487.018 of the Criminal Code) that (specify the data)
b) (si la demande vise à obtenir une ordonnance en vertu de l'article 487.018 du Code criminel) (préciser les données)

is in the possession or control of _____ and will assist in the investigation of
sont en la possession de _____ (name of the financial institution, person or entity / nom de l'institution financière, de la personne ou de l'entité) ou à sa disposition et seront utiles à
the offence.
l'enquête relative à l'infraction.

The reasonable grounds are:
Les motifs raisonnables sont les suivants :
See Appendix C

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The informant therefore requests
En conséquence, le dénonciateur demande

(if the application is for an order under section 487.014 of the Criminal Code) that
(si la demande vise à obtenir une ordonnance en vertu de l'article 487.014 du Code criminel) qu'il soit ordonné à

- Janine HOOVER, Conestoga
College, 299 Doon Valley Dr.,
Kitchener ON
- Deb STOCKMANN, Fanshawe
College, E1012, 1001 Fanshawe
College Blvd., London ON
- Paul BRENNAN, The College of
Nurses of Ontario, 101
Davenport Rd., Toronto ON

_____ be ordered to produce a document that is a copy of See Appendix B
(name of the person / nom de la personne) de communiquer un document qui est la copie de _____ (specify the document / indiquer la document)

that is in their possession or control when they receive the order (and/or to prepare and produce a document containing (specify the data)
qui est en sa possession ou à sa disposition au moment où il ou elle reçoit l'ordonnance (ou d'établir et de communiquer un
document comportant (indiquer les données)
Within 14 days of receiving the order

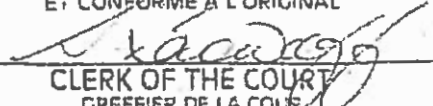
that is in their possession or control when they receive the order).
qui sont en sa possession ou à sa disposition au moment où il ou elle reçoit l'ordonnance).

OR / OU

(if the application is for an order under section 487.015 of the Criminal Code) that a person who is served with the order in accordance
with subsection 487.015(4) of the Criminal Code be ordered to prepare and produce a document containing (specify the transmission data)
(si la demande vise à obtenir une ordonnance en vertu de l'article 487.015 du Code criminel) qu'il soit ordonné à toute
personne à qui l'ordonnance est signifiée conformément au paragraphe 487.015(4) du Code criminel d'établir et de
communiquer un document comportant (préciser les données de transmission)

that is in their possession or control when they are served with the order.
çui sont en sa possession ou à sa disposition au moment où l'ordonnance lui est signifiée.

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INFORMATION TO OBTAIN A PRODUCTION ORDER
DÉNONCIATION EN VUE D'OBTENIR UNE ORDONNANCE DE COMMUNICATION

Form / Formule 5.004
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487.016(2), 487.017(2) and / et 487.018(3)
of the Criminal Code / du Code criminel
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OR / OU

(if the application is for an order under section 487.016 of the Criminal Code) that
(si la demande vise à obtenir une ordonnance en vertu de l'article 487.016 du Code criminel) qu'il soit ordonné à

_____ be ordered to prepare and produce a document containing (specify the transmission data)
(name of the person / nom de la personne) d'établir et de communiquer un document comportant (préciser les données de transmission)

that is in their possession or control when they receive the order.
qui sont en sa possession ou à sa disposition au moment où il ou elle reçoit l'ordonnance.

OR / OU

(if the application is for an order under section 487.017 of the Criminal Code) that
(si la demande vise à obtenir une ordonnance en vertu de l'article 487.017 du Code criminel) qu'il soit ordonné à

_____ be ordered to prepare and produce a document containing (specify the tracking data)
(name of the person / nom de la personne) d'établir et de communiquer un document comportant (préciser les données de localisation)

that is in their possession or control when they receive the order.
qui sont en sa possession ou à sa disposition au moment où il ou elle reçoit l'ordonnance.

OR / OU

(if the application is for an order under section 487.018 of the Criminal Code) that
(si la demande vise à obtenir une ordonnance en vertu de l'article 487.018 du Code criminel) qu'il soit ordonné à

_____ be ordered to prepare and produce a document containing (specify the data)
(name of the financial institution, person or entity / nom de l'institution financière, de la personne ou de l'entité) d'établir et de communiquer un document comportant (préciser les données)

that is in their possession or control when they receive the order.
qui sont en sa possession ou à sa disposition au moment où il ou elle reçoit l'ordonnance.

Sworn before me on October 26th, 2016

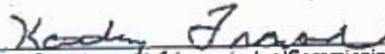
Fait sous serment devant moi ce _____ (date)

at The City of Woodstock

à (au) _____ (place / lieu)



(Signature of informant / Signature du dénonciateur)



(Signature of justice or judge/Commissioner of Oaths
Signature du juge de paix ou du juge/Commissaire à l'assermentation)

Kathryn Anne Fraser, a
Commissioner, etc., Province of
Ontario, for Woodstock Police
Service. CLERK OF THE COURT
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ONTARIO COURT OF JUSTICE
CLERK DE LA COUR DE JUSTICE DE L'ONTARIO

APPENDIX "A"

This is Appendix "A" attached to and forming a part of the Production Order for the documents or data referred to in Appendix "B":

Elizabeth Tracy Mae WETTLAUFER (DOB: 10JUN67) on or about the 12th day of August 2007, did commit first degree murder on the person of James Lancing SILCOX, contrary to Section 235(1) of The Criminal Code of Canada

AND FURTHER: Elizabeth Tracy Mae WETTLAUFER (DOB: 10JUN67) on or about the month of September 2007, did commit attempted murder on the person of Clotilda ADRIANO by administering an overdose of insulin, contrary to Section 239(1)(b) of The Criminal Code of Canada

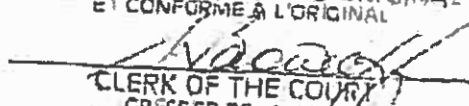
AND FURTHER: Elizabeth Tracy Mae WETTLAUFER (DOB: 10JUN67) on or about the month of September 2007, did commit attempted murder on the person of Albina DEMEDEIROS by administering an overdose of insulin, contrary to Section 239(1)(b) of The Criminal Code of Canada

AND FURTHER: Elizabeth Tracy Mae WETTLAUFER (DOB: 10JUN67) on or about the 27th day of October 2007, did commit first degree murder on the person of Helen Muriel MATHESON, contrary to Section 235(1) of The Criminal Code of Canada

AND FURTHER: Elizabeth Tracy Mae WETTLAUFER (DOB: 10JUN67) on or about the 23rd day of December 2007, did commit first degree murder on the person of Maurice "Moe" GRANAT, contrary to Section 235(1) of The Criminal Code of Canada

AND FURTHER: Elizabeth Tracy Mae WETTLAUFER (DOB: 10JUN67) on or about the month of October 2008, did commit attempted murder on the person of Wayne HEDGES by administering an overdose of insulin, contrary to Section 239(1)(b) of The Criminal Code of Canada

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AND FURTHER: Elizabeth Tracy Mae WETTCLAUFER (DOB: 10JUN67) on or about the 1st of January 2009 until the 31st of December 2009, did commit attempted murder on the person of Michael Stephen PRIDDLE by administering an overdose of insulin, contrary to Section 239(1)(b) of The Criminal Code of Canada

AND FURTHER: Elizabeth Tracy Mae WETTCLAUFER (DOB: 10JUN67) on or about the 14th day of October 2011, did commit first degree murder on the person of Gladys MILLARD, contrary to Section 235(1) of The Criminal Code of Canada

AND FURTHER: Elizabeth Tracy Mae WETTCLAUFER (DOB: 10JUN67) on or about the month of November 2011, did commit first degree murder on the person of Helen ZURAWINSKI, contrary to Section 235(1) of The Criminal Code of Canada

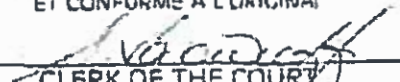
AND FURTHER: Elizabeth Tracy Mae WETTCLAUFER (DOB: 10JUN67) on or about the 14th day of July 2013, did commit first degree murder on the person of Helen Whitelaw Marshall YOUNG, contrary to Section 235(1) of The Criminal Code of Canada

AND FURTHER: Elizabeth Tracy Mae WETTCLAUFER (DOB: 10JUN67) on or about the 28th of March 2014, did commit first degree murder on the person of Maureen PICKERING (Nee: O'NEIL), contrary to Section 235(1) of The Criminal Code of Canada

AND FURTHER: Elizabeth Tracy Mae WETTCLAUFER (DOB: 10JUN67) on or about the 31st day of August 2014, did commit first degree murder on the person of Arpad HORVATH, contrary to Section 235(1) of The Criminal Code of Canada

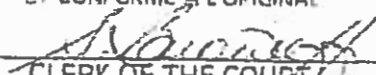
AND FURTHER: Elizabeth Tracy Mae WETTCLAUFER (DOB: 10JUN67) on or about the 1st of November 2015 until the 31st of March 2016, did commit attempted murder on the person of Sandra TOWLER by administering an overdose of insulin, contrary to Section 239(1)(b) of The Criminal Code of Canada

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AND FURTHER: Elizabeth Tracy Mae WETTLAUFER (DOB: 10JUN67) on or about the month of August 2016, did commit attempted murder on the person of Beverly BERTRAM by administering an overdose of insulin, contrary to Section 239(1)(b) of The Criminal Code of Canada

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LE JUGE DE LA JUSTICE EN ONTARIO

APPENDIX "B"

This is Appendix "B" attached to and forming a part of the Production Order for the following documents or data:

Conestoga College:

All student records for Elizabeth "Beth" WETTLAUFER (Nee: PARKER) located at 299 Doon Valley Drive, Kitchener Ontario.

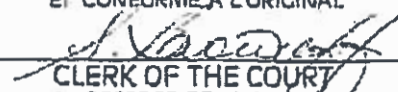
Fanshawe College:

All student records for Elizabeth "Beth" WETTLAUFER (Nee: PARKER) located at Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario.

The College of Nurses of Ontario:

All records for or pertaining to Elizabeth "Beth" WETTLAUFER (Nee: PARKER) located at 101 Davenport Road, Toronto Ontario.

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APPENDIX "B"

This is Appendix "B" attached to and forming a part of the Production Order for the following documents or data:

Conestoga College:

All student records for Elizabeth "Beth" WETTCLAUFER (Nee: PARKER) located at 299 Doon Valley Drive, Kitchener Ontario.

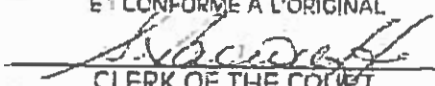
Fanshawe College:

All student records for Elizabeth "Beth" WETTCLAUFER (Nee: PARKER) located at Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario.

The College of Nurses of Ontario:

All records for or pertaining to Elizabeth "Beth" WETTCLAUFER (Nee: PARKER) located at 101 Davenport Road, Toronto Ontario.

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COUR DE JUSTICE DE L'ONTARIO

APPENDIX "C"

This is Appendix "C" attached to and forming a part of the Production Order for the documents referred to in Appendix "B":

INTRODUCTION

I, Tim PINDER a peace officer and a member of the Woodstock Police Service make oath and say as follows:

I, Detective Constable (D/Cst.) Tim PINDER have been a Police officer since January 2003. I was a former member of the Oxford Community Police Service, then became a member of the Woodstock Police Service in October of 2009 when the Oxford Community Police Service disbanded. I am currently assigned to the Criminal Investigation Branch of the Woodstock Police Service and have been since January 1st, 2013.

Unless otherwise stated all the information contained in this information was obtained by myself personally or through conversations with witnesses or police officers or from their reports or notes all of which I have access to. I believe the information provided to me to be accurate.

In this information I refer to the Niche Records Management System (RMS). This is a computerized system, which compiles information on persons, premises or incidents and any information that the Woodstock Police Service may receive. All of this information is cross-referenced in the same manner. Most of the data in-put into this system originates with the Ontario Provincial Police personnel, or other police services or government agencies. It includes access to the Police Information Portal (PIP) which includes information and reports from other police agencies that operate similar records management systems to Niche. I consider Niche RMS and PIP to be credible, trustworthy and reliable sources.

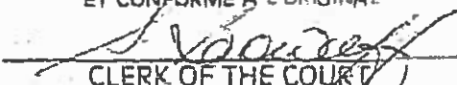
In this Information I may refer to the acronym CPIC, which refers to the Canadian Police Information Centre. The Canadian Police Information Centre is a Dominion wide computer database system that allows for police access to information relating to: criminal records maintained under the authority of the Identification of Criminals Act; the names addresses and

birth dates of accused persons and criminal charges that are before the courts; information relating to terms of existing bail and probation orders and; drivers licence and motor vehicle registration information maintained by provincial licencing agencies. The data included in the CPIC system is supplied by law enforcement agencies and Federal and Provincial government agencies authorized by law to maintain records of the particular types included in the system. The CPIC information system is a closed access system restricted for use by law enforcement and other authorized agencies for purposes related to the administration of justice, law enforcement and police investigation. The entry of data into the CPIC computer system is strictly controlled and subject to rules designed to maintain the accuracy of the information included. I am familiar with the information provided through the CPIC system and I find it to be correct and reliable. Certain information that form grounds for belief, in this Information to Obtain, is information obtained from the CPIC system and I believe it to be true.

In this information I may refer to the records of the Ministry of Transportation. The Ministry of Transportation compiles and maintains information on Ontario vehicle registrations and Ontario drivers licence information. This information is available to police agencies through an interface with CPIC called the Paris system - Police Automated Registration Information System as well as on-line via a police access only website titled, "MTO Inquiry Services". The information contained in this system originates with the registered owners of vehicles and persons with Ontario driver's licences. These individuals are required by Provincial Legislation to ensure current and accurate information with respect to vehicle registration and drivers licence information. I consider the Ministry of Transportation records to be a credible, trustworthy and reliable source.

This information is not intended to be an exhaustive summary of the investigation, but is intended to set out reasonable grounds in support of a Production Order for documents compiled and controlled by Janine HOOVER – Associate Registrar, Conestoga College, 299 Doon Valley Dr., Kitchener ON, Deb STOCKMANN – Student Records Team Leader, Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario, and Paul BRENNAN, Manager of Reports and Prosecutions, Professional Standards, The College of Nurses of Ontario, 101 Davenport Rd., Toronto Ontario.

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PERSONS AND LOCATIONS:

Elizabeth "Beth" Tracey Mae WETTLAUFER (Nee: PARKER) – hereafter named Beth WETTLAUFER - Suspect in the murders of 8 elderly patients and the attempted murders of 6 others.

Janine HOOVER – Associate Registrar, Conestoga College, 299 Doon Valley Dr., Kitchener Ontario, who has access to and control of the records being requested in this Information to Obtain a Production Order.

Deb STOCKMANN – Student Records Team Leader, Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario, who has access to and control of the records being requested in this Information to Obtain a Production Order.

Paul BRENNAN – Manager of Reports and Prosecutions, Professional Standards, the College of Nurses of Ontario, 101 Davenport Rd., Toronto Ontario, who has access to and control of the records being requested in the Information to Obtain a Production Order.

James Lancing SILCOX – long term care patient at Caressant Care Woodstock, who died on August 12th 2007.

Clotilda ADRIANO – long term care patient at Caressant Care Woodstock, who died on July 30th 2008.

Albina DEMEDEIROS - long term care patient at Caressant Care Woodstock, who died on February 25th 2010.

Maurice GRANAT – long term care patient at Caressant Care Woodstock, who died on December 23rd 2007.

Helen Muriel MATHESON - long term care patient at Caressant Care Woodstock, who died on

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October 27th 2011

Gladys MILLARD - long term care patient at Caressant Care Woodstock, who died on October 14th 2011.

Helen ZURAWINSKI - long term care patient at Caressant Care Woodstock, who died on or about November 2011.

Helen Whitelaw Marshall YOUNG – long term care patient at Caressant Care Woodstock, who died on July 14th 2014.

Maureen PICKERING - long term care patient at Caressant Care Woodstock, who died on March 28th 2014.

Arpad HORVATH – long term care patient at Meadow Park Centre in London, who died on August 31st 2014.

Michael Stephen PRIDDLE – long term care patient at Caressant Care Woodstock, who died in December 2012.

Wayne HEDGES – long term care patient at Caressant Care Woodstock, who died on October 28th, 2008.

Sandra TOWLER – long term care patient at [REDACTED], who is still alive [REDACTED]. Throughout this Information to Obtain she may be referred to as Sandra "FOWLER", as the spelling of her surname was incorrectly provided to police during the original stages of this investigation.

Beverly BERTRAM – in-home care patient who lives [REDACTED], and had been under the care of Beth WETTLAUFER.

OVERVIEW:

1) On September 16th 2016, Beth WETTLAUFER, a registered nurse residing in Woodstock Ontario, checked herself into the Centre for Addiction and Mental Health located at 250 College St., Toronto Ontario. [REDACTED]

[REDACTED]. The psychiatrist who cared for WETTLAUFER was Dr. Alan KHAN¹

2) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

3) [REDACTED]
[REDACTED]

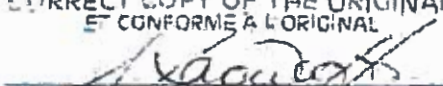
4) At approximately 18:35 Hrs. the Toronto Police Service contacted the Woodstock Police Service regarding the allegations, since the majority of the offences occurred in Woodstock. The investigation was turned over to the Woodstock Police Service Criminal Investigation Bureau for further investigation.

BACKGROUND OF INVESTIGATION:

On the basis of the foregoing paragraphs, I believe on reasonable grounds that Beth WETTLAUFER is responsible for the Criminal Code offences under section 235 (1) and 239 (1)

(b). My grounds for belief may be summarized as follows:

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¹ Dr. Alan KHAN, is a psychiatrist currently employed at the Centre for Addiction and Mental Health in Toronto, hereafter named CAMH. He was Elizabeth WETTLAUFER's doctor during her stay at CAMH.

5) On September 29th 2016, at 19:40 Hrs. I was briefed by Detective Constable Karen OVERBAUGH² regarding a call she took from the Toronto Police Service. I learned the following:

- Beth WETTLAUFER had checked herself into a CAMH in Toronto

- WETTLAUFER was a registered nurse (RN) at Caressant Care [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6) At 20:40 Hrs. I attended Caressant Care with D.C. OVERBAUGH and spoke with the nurse on duty. She confirmed that Beth WETTLAUFER had been employed as an RN there but that she hadn't worked at Caressant Care for approximately 1 year

7) On September 30th 2016, at 17:30 Hrs. I spoke with Detective Pat ALBERGA³. I learned the following:

- Detective ALBERGA had interviewed Beth WETTLAUFER

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- The psychiatrist was going to release her from CAMH on Wednesday October 5th 2016

[REDACTED]

[REDACTED]

² Detective Constable Karen OVERBAUGH, hereafter named D.C. OVERBAUGH, is a Detective Constable with the Woodstock Police Service and the primary investigator in this case.

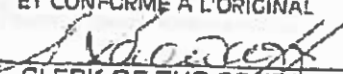
³ Pat ALBERGA is a detective with the Toronto Police Service.

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9) In reading the witness statement of **Glen HART**, which was written by HART and provided by Detective ALBERGA, I learned the following:

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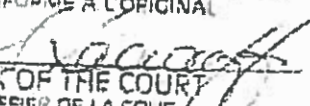
10) I began searching on-line for the names of victims [REDACTED] I was looking for death notices and/or obituaries [REDACTED] [REDACTED] I learned the following [REDACTED] [REDACTED]

- James SILCOX died on August 12th 2007
- His death notice was in the Woodstock Sentinel Review
- Maurice GRANAT died on December 23rd 2007, at Caressant Care
- Helen MATHESON died on October 27th 2011, at Caressant Care
- I was unable to find a death notice or obituary for Mary ZERWINKSKI

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- Gladys MILLARD died on October 14th 2011, at Caressant Care
- Helen YOUNG died on July 14th 2013, at Caressant Care
- Maureen PICKERING died on March 28th 2014, at Caressant Care
- Arpad HORVATH died on August 31st 2014, at Victoria Hospital in London
- Clotilde ADRIANO had since died on July 30th 2008, at Caressant Care
- Albina DEMEDEIROS had since died on February 25th 2010, at Woodstock General Hospital
- DEMEDEIROS was listed as being "Formerly of Caressant Care"

11) At 21:37 Hrs. I spoke with staff at Caressant Care. I learned that Helen CROMBEZ⁶ would have the patient notes and nurses schedules that would be required by police.

12) At 11:55 Hrs. I attended at Saint Elizabeth Health Care in Woodstock. I spoke with the nurse in charge there and learned the following:

- WETTLAUFER used to work at Saint Elizabeth but quit approximately 1 month earlier
- Saint Elizabeth services patients throughout the county, including Ingersoll
- Tamara CONDY⁷ could provide police with more information such as WETTLAUFER's patient list so that police could find out who "Beverly" was

13) On October 4th 2016, I was involved in a briefing on this investigation with D/Sgt. TALSMA, D.C. OVERBAUGH, and Detective Constable Adam DICOLA⁸. D.C. OVERBAUGH provided an update on the investigation and I learned the following:

- D.C. OVERBAUGH spoke with Helen CROMBEZ of Caressant Care
- WETTLAUFER hadn't worked there in approximately 1 year

⁶ Helen CROMBEZ is a Registered Nurse and the Director of Nursing at Caressant Care

⁷ Tamara CONDY is the Supervisor at Saint Elizabeth

⁸ Detective Constable Adam DICOLA, hereafter named D.C. DICOLA, is a Detective Constable in the Criminal Investigation Bureau of the Woodstock Police Service

- CROMBEZ went through the 7 patients [REDACTED]
- CROMBEZ went through the patient notes [REDACTED]
- [REDACTED] specifically the observation of diaphoretic patients, that a patient had a seizure despite not being epileptic, and that a deceased patient had bulging eyes
- CROMBEZ stated that these symptoms are consistent with an insulin overdose
- Insulin isn't accounted for or secured at Caressant Care
- Insulin would never be looked at as a cause of death
- [REDACTED]
- ADRIANO was found on August 27th 2007 and was clammy, sweating and difficult to arouse
- When ADRIANO was found this way WETTLAUFER was working that night and that was the only time that ADRIANO exhibited those symptoms
- D.C. OVERBAUGH also spoke with Dr. Elizabeth URBANKE⁹ at Woodstock General Hospital
- Dr. URBANKE confirmed that insulin levels would never be checked at the time of death
- You wouldn't be able to determine insulin levels by exhuming bodies and even if you were looking for insulin levels during an autopsy it would be difficult to find
- [REDACTED]
- [REDACTED]
- [REDACTED]
- Dr. Alan KAHN was the psychiatrist attending to WETTLAUFER

14) [REDACTED]
 [REDACTED]
 [REDACTED]

[REDACTED]

⁹ Dr. Elizabeth URBANKE is an ER doctor at Woodstock General Hospital and also a registered nurse

¹⁰ Detective Kevin HAMILTON is a Detective with the Toronto Police Service

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15) At 11:27 Hrs. I completed an internet search for the CAMH and learned that it was located at 250 College Street, Toronto Ontario.

16) [REDACTED]

17) [REDACTED]
[REDACTED]
[REDACTED]

18) At 15:58 Hrs. I spoke with D.C. DICOLA. I learned the following:

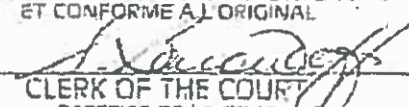
- He went to Meadow Park Care Centre in London
- He spoke with Nicole ROSS¹¹
- ROSS advised that she has in her possession progress notes for the time period surrounding Arpad HORVATH's transfer from their facility to Victoria Hospital and his subsequent death, Medication Administration Records, WETTLAUFER's personnel file and progress notes specifically for HORVATH
- ROSS indicated that the notes were available immediately, though she would need up to 7 days to produce them in case she wasn't working at the time she was served with a Production Order
- ROSS indicated that the notes were in her possession at Meadow Park Care Centre, 1210 Southdale Rd East, London Ontario
- ROSS said that e-mail or facsimile service of the Production Order would suffice and that she could provide a copy to police via the same
- ROSS provided an e-mail address of [REDACTED]

19) On October 5th 2016, I was part of a briefing that included D/Sgt. TALSMA, D.C. OVERBAUGH, D.C. DICOLA and D.C. EASTLAKE. During this briefing I learned the following:

- D.C. EASTLAKE stated that she attended Telfer Place in Paris
- In April 2016, WETTLAUFER was asked not to return to their facility due to her behavior towards other staff members
- Sandra "FOWLER" was actually named Sandra TOWLER

¹¹ Nicole ROSS is the Administrator of the Meadow Park Care Centre in London

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- TOWLER went to hospital in 2015 after becoming confused, however this was determined to be from a "UTI"
- It was confirmed that WETTLAUFER would have cared for TOWLER while she was there
- Insulin was not controlled or monitored at Telfer Place
- WETTLAUFER was also employed through "Life Guard", but her last day was August 7th 2016. WETTLAUFER quit because she sent an e-mail to Life Guard in which she stated that she, "Can no longer function as a Registered Nurse"
- D.C. DICOLA stated that he spoke with Tamara CONDY
- WETTLAUFER only worked for Saint Elizabeth for approximately 5 weeks
- There wasn't any negative feedback from patients or colleagues regarding WETTLAUFER during that time
- WETTLAUFER resigned on September 2nd 2016, stated that she couldn't do it anymore
- D.C. DICOLA spoke with Patricia MALONE¹² of Saint Elizabeth. She had control of WETTLAUFER's employment records, patient list, and her resignation letter
- MALONE was aware that police would be requesting a Production Order for those materials and had them prepared
- MALONE could be served at 90 Allstate Parkway, Markham Ontario
- D.C. OVERBAUGH-stated that she'd spoken again with CROMBEZ
- CROMBEZ had control of the Caressant Care "Death register"¹³ from 2007 – 2014
- CROMBEZ also has control of WETTLAUFER's personnel file as well as patient notes of the deceased victims titled "Click to care patient records"
- The files were located at her office at 81 Fyfe Avenue, Woodstock Ontario
- The records were mostly prepared already and could be provided to police within 7 days from the date of the service of a Production Order
- D.C. OVERBAUGH further stated that CROMBEZ disclosed that WETTLAUFER was dismissed from Caressant Care in 2014 for failing to follow insulin protocol

¹² Patricia MALONE is the Corporate Integrity Officer for Saint Elizabeth Health Care

¹³ On 04OCT16, at 16:00 Hrs, D.C. OVERBAUGH learned via conference call with Dr. URBANKE that Caressant Care had a Death Register. It was practice until 2014 for a coroner to attend on every 10th death at Caressant Care regardless of the circumstances. Caressant Care held these records.

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20) At 09:17 Hrs. I spoke with Pat MALONE. She advised that she'd need 72 hours to produce the required documents upon service of a Production Order, and that e-mail service to her e-mail account [REDACTED] would suffice for service.

21) At 16:55 Hrs. I spoke with D.C. OVERBAUGH. I learned the following:

- Legal Counsel for CAMH was Kristin TAYLOR
- TAYLOR was the person to be contacted in order to obtain the medical records of Beth WETTLAUFER from her admission at CAMH
- TAYLOR's e-mail address was [REDACTED]

22) At 16:58 Hrs. I spoke with D.C. EASTLAKE. I learned the following:

- Telfer Place in Paris is owned and operated by Revera Longterm living
- Frank CERRONE is the Senior Vice President of Revera and responsible for assisting police with regards to Production Order Requests

23) At 20:44 Hrs. I received an e-mail from Chief William RENTON¹⁴. He mentioned information that the Toronto Police Service had interviewed Dr. KHAN.

24) On October 6th 2016, at 08:05 Hrs. I was involved in a briefing regarding this investigation.

[REDACTED]

[REDACTED]

[REDACTED] I also asked in this briefing if any of the other detectives had knowledge of a statement obtained by the Toronto Police Service from Dr. KHAN. I learned that D.C. OVERBAUGH had been told by Detective ALBERGA that they'd obtained a statement from Dr. KHAN and that it was mentioned in their report, which

¹⁴ Chief William RENTON is the Chief of Police of The Woodstock Police Service

¹⁵ Detective Constable HERGOTT, hereafter named D.C. HERGOTT, is a Detective Constable with the Woodstock Police Service

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I hadn't read. I viewed the Toronto Police Service report on Niche and learned the following:

- Dr. KHAN was interviewed on September 29th 2016

- [REDACTED]
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- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
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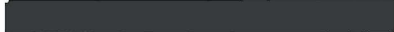
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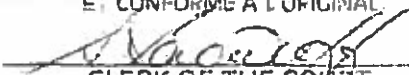
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26) At 10:38 Hrs. I received an e-mail from D.C. EASTLAKE, and I also spoke with her. I learned the following:

- She had been in contact with Revera Retirement Living earlier that morning
- The person in charge of providing records to police in response to Production Order requests was Melanie STEELE, of Revera Retirement Living and Long Term Care Services, 55 Standish Court, Mississauga Ontario, [REDACTED]
- She had access to and control of the records required
- She could produce the records within 7 days

27) At 14:58 Hrs. I dropped off an Information to Obtain a Production Order at Court for records located at Caressant Care, Revera Retirement Living, Meadow Park and Saint Elizabeth. At 15:55 Hrs. I retrieved the Production Orders that had been signed by a Judge so that I could serve them.

28) On October 19th 2016, I returned from a holiday and learned that I would be required to write more production orders, including additional production orders for Caressant Care, Meadow Park, and Saint Elizabeth.

29) At 08:05 Hrs. I met with D/Sgt. TALSMA in his office. I viewed a forwarded email from Detective Steve SIMONE¹⁶. I learned that he'd spoken directly with Nicole ROSS who advised she had in her possession a copy of the Meadow Park Death Registry, a list of medication errors and the controlled substances record pertaining to the medication cart accessible to Beth WETTLAUFER, and the staffing schedule for Meadow Park.

30) At 08:31 Hrs. I spoke with D.C. OVERBAUGH. I learned the following:

- On October 6th 2016, at 17:00 Hrs. she received an e-mail from Kathy FRASER¹⁷ advising her that there was a message from Helen CROMBEZ indicating that Helen CROMBEZ believed that the victim "Mike" was in fact Mike PRIDDLE, and that the victim "Wayne" was in fact Wayne HEDGES, who died on October 28th 2008. [REDACTED]

¹⁶ Detective Steve SIMONE is a Detective with the London Police Service, and is the lead investigator regarding the death of Arpad HORVATH, [REDACTED]

¹⁷ Kathy FRASER is an administrative assistant assigned to the Woodstock Police Service Criminal Investigations Bureau

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- On October 7th 2016, at 09:42 Hrs. D.C. OVERBAUGH spoke with Helen CROMBEZ directly. CROMBEZ advised that WETTLAUFER had given "glucagon" to Wayne HEDGES when he was found with critically low blood sugar and that "glucagon" reverses the effects of low blood sugar. Mike's full name was Michael Stephen PRIDDLE and he died in December 2012. There was no time that PRIDDLE was found unresponsive but he was under the direct care of WETTLAUFER, had Huntington's Disease, and was a patient at Caressant Care at the time [REDACTED]
- On Monday October 10th at 2016 at 11:47 Hrs. D.C. OVERBAUGH attended at Beth WETTLAUFER's new address at [REDACTED], [REDACTED]
[REDACTED]
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[REDACTED]
- D.C. OVERBAUGH also confirmed that Helen CROMBEZ is aware that the Woodstock Police Service will be requesting patient records for Mike PRIDDLE and Wayne HEDGES and that she could have those records ready within 7 days

31) At 10:17 Hrs. I spoke with Detective Constable Beth BROWN¹⁸, and I also viewed some of the records provided from Saint Elizabeth Health Care for the original Production Order. I learned the following:

- [REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]

¹⁸ Detective Constable Beth BROWN, hereafter named D.C. BROWN, is a Detective Constable with the Ontario Provincial Police and the lead investigator for the Oxford OPP investigation of the attempted murder of Beverly BERTRAM, as she resides within their jurisdiction

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- Beth WETTLAUFER worked for Saint Elizabeth from July 20th 2016, until August 29th 2016

32) At 10:30 Hrs. I spoke directly with Detective SIMONE. I learned the following:

- He saw Nicole ROSS personally
- Nicole ROSS confirmed that she had in her possession the required records which had already been prepared
- Nicole ROSS would only need one day to produce the records

33) At 10:44 Hrs. I spoke with Constable Matt LYNCH¹⁹. I learned the following:

- It was learned through Beth WETTLAUFER's ex-husband Daniel WETTLAUFER that Beth WETTLAUFER used to work at the Geraldton Regional Hospital located at 500 Hogarth Avenue, Geraldton Ontario
- Beth WETTLAUFER's maiden name was "PARKER"
- An MTO check confirmed Beth WETTLAUFER had an address in Geraldton in 1995
- P.C. LYNCH spoke with Dori GIGNAC²⁰ on October 17th 2016, and GIGNAC confirmed that Beth "PARKER" was previously employed at Geraldton Regional Hospital
- Pauline VIOLETTE had possession and control of the employment records for Beth WETTLAUFER (Nee: PARKER)
- P.C. LYNCH included this information in an e-mail he sent to me, which I read

34) At 10:52 Hrs. I spoke with Pauline VIOLETTE. She told me that she would need less than 7 days to produce the employment records of Beth WETTLAUFER (Nee. PARKER) and that e-mail service to [REDACTED] would be sufficient for the service of the Production Order.

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¹⁹ Constable Matt LYNCH, hereafter named P.C. LYNCH, is a police constable with the Woodstock Police Services currently assigned to assist the Criminal Investigation Bureau with this investigation

²⁰ Dori GIGNAC is the payroll and benefits coordinator with Geraldton Regional Hospital

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35) At 11:05 Hrs. I spoke with Pat MALONE again. She told me that e-mail service of the Production Order would be sufficient, that she had control of the medical records for Beverly BERTRAM as well as employee records of the other nurses working out of the Saint Elizabeth Woodstock Ontario location, and that she'd need less than 7 days to produce these records.

36) At 11:41 Hrs. I read an e-mail from Kristin TAYLOR which had been sent to me while I was away on vacation. I learned the following:

- A Production Order for Beth WETTLAUFER's medical records from CAMH should be made out to "Manager, Health Records – CAMH, 1001 Queen Street, Toronto"
- The Production Order should be made out to Kristin TAYLOR via fax or e-mail:
[REDACTED]
- Kristin Taylor is having the information prepared so it's ready for the police when the Production Order is issued
- They would need 1 day to produce the records upon the service of a Production Order

37) At 11:55 Hrs. I checked the MTO site and confirmed that WETTLAUFER had a surname of PARKER in 1995

38) [REDACTED]
[REDACTED]
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39) On 20OCT16, at 08:22 Hrs. I spoke with D/Sgt. TALSMA. I learned the following:

- While I was away on vacation, officers went through the documents from Caressant Care, Meadow Park, Saint Elizabeth and Revera Retirement Living that were obtained from the Production Orders already issued
- It was confirmed that Beth WETTLAUFER had direct care of each of the victims mentioned in the Productions Orders at, or just prior to, the time of their deaths [REDACTED]

40) At 11:40 Hrs. D/Sgt. TALSMA told me that in addition to patient notes, we would also require all medical records from all victims at Caressant Care and Meadow Park, including their death certificates and initial triage notes

41) At 11:50 Hrs. I spoke with Helen CROMBEZ. I learned the following:

- She has control of all medical records of the 11 victims from Caressant Care
- She could produce these records within 7 days
- These records include copies of the death certificates of the victims
- These records include the initial admission records of the victims

42) At 14:59 Hrs. I spoke with D.C. HERGOTT and I learned the following:

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- Beth WETTLAUFER's family doctor is Dr. Jonny TAM²¹
- Beth WETTLAUFER told him this directly
- On October 12th 2016, at 10:20 Hrs., he spoke with Sandy HOLTBY²² who confirmed that Beth WETTLAUFER was Dr. TAM's patient
- Sandy HOLTBY stated that if a Production Order was required all records were held by Dr. Jonny TAM who would be required to be served in person
- The records are held at [REDACTED], Woodstock Ontario

43) At 15:15 Hrs. I spoke with Nicole ROSS. I learned that she still had control of all of Arpad HORVATH's medical records including his admission summary and that she could produce these records within 7 days.

44) At 15:19 Hrs. I spoke with Constable Mike ROUNTLY²³ and learned the following:

- At 15:04 Hrs. he spoke with Sharon GROENEVELD²⁴ of Superior Greenstone for Community Living (formerly Geraldton and District Association for Community Living) and confirmed that Beth PARKER was employed there in the mid 1990's
- Sharon GROENEVELD has access to and control of the employment records
- Sharon GROENEVELD could be served a Production Order via e-mail to [REDACTED]
- The records are located at Superior Greenstone for Community Living (formerly Geraldton and District Association for Community Living), 206 Hogarth West, Geraldton Ontario

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²¹ Dr. Jonny TAM, is a family physician with an office in Woodstock Ontario.

²² Sandy HOLTBY is a nurse employed at Dr. Jonny TAM's office.

²³ Constable Mike ROUNTLY, hereafter named P.C. ROUNTLY, is a constable with the Woodstock Police Service assigned to assist the Criminal Investigation Bureau with this investigation.

²⁴ Sharon GROENEVELD is the manager of Superior Greenstone Association for Community Living

- At 15:10 Hrs. P.C. ROUTLY spoke with Yolanda AKHTAR²⁵ of Christians Horizons
- AKHTAR believed that Beth WETTLAUFER worked for them, but she stated she'd confirm that and let P.C. ROUTLY know

45) At 15:30 Hrs. I spoke with P.C. LYNCH. I learned the following:

- At 15:26 Hrs. he spoke with Janine HOOVER of Conestoga College
- She has control of all student records including those from students who attended the now closed Stratford Ontario campus
- The records are located at Conestoga College, 299 Doon Valley Drive, Kitchener Ontario
- Janine HOOVER could be served via e-mail to [REDACTED]
- She would require 2 weeks to produce the records

46) At 15:36 Hrs. I viewed Beth WETTLAUFER's resume that had been obtained from a previous Production Order for records from Caressant Care. The resume indicated the following:

- Beth WETTLAUFER obtained a Registered Nurse Diploma from Conestoga College, Stratford Ontario, during the time period of September 1992 – April 1995
- Beth WETTLAUFER worked as a Staff Nurse at Victoria Rest Home, 265 Victoria St. N, Woodstock Ontario, from March 1996 until October 1996
- Beth WETTLAUFER worked for Christian Horizons, 289 Graham Street, Woodstock Ontario, starting in June 1996, and had a reference letter from them dated June 11th, 2007

47) At 11:47 Hrs. I spoke with P.C. ROUTLY. I learned the following:

²⁵ Yolanda AKHTAR is the Program Manager at Christian Horizons

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- He spoke again with Yolanda AKHTAR, who confirmed that WETTLAUFER was previously employed with Christian Horizons
- AKHTAR advised that Marc GORAL, Human Resources Manager, Christian Horizons, 4278 King Street East, Kitchener Ontario, had control of the employment records for Beth WETTLAUFER and that those records were located at the above address
- E-mail service to March GORAL at [REDACTED] was sufficient for service of the Production Order

48) On October 24th, 2016, at 08:57 Hrs. I was present for a briefing on this investigation that included representatives from the OPP, London PS and Woodstock PS. I learned the following:

- Det. SIMONE had received the records from Meadow Park for the first Production Order issued
- Records showed that HORVATH was found unresponsive with very low blood sugar
- HORVATH was given glucagen to raise his blood sugar and he was transported to Victoria Hospital
- After HORVATH's blood sugar was stabilized from the glucagen, it crashed and became very low again shortly thereafter as the long acting insulin kicked in
- [REDACTED]
- [REDACTED]

49) At 09:33 Hrs. I read the medical notes from HORVATH's medical records that were provided to me by Det. SIMONE. I learned the following:

- There were three instances where HORVATH was found with low blood sugar. Those instances were on June 28th 2014, July 12th 2014 and August 3rd 2014.
- In each of these incidents, Beth WETTLAUFER was the nurse taking care of HORVATH

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- On August 24th 2014, at 06:21 Hrs. HORVATH was found unresponsive, diaphoretic, cold and clammy, with a very low Blood Sugar of 3.1 mmol
- The nurses gave HORVATH glucagon to get his blood sugar raised
- Middlesex-London EMS transported HORVATH to Victoria Hospital
- At 06:31 Hrs. EMS checked WETTLAUFER's blood sugar and it was at 1.4 mmol
- En route to hospital, the blood sugar went up to 10.4 mmol
- At 07:05 Hrs. HORVATH's blood sugar was at 9.5 mmol
- At 09:20 Hrs. HORVATH's blood sugar dipped back down to 2.2 mmol

50) At 09:42 Hrs. I read WETTLAUFER's resume from the Production Order for employment records from Saint Elizabeth. I learned the following:

- WETTLAUFER received a "Nursing Foot Care" certificate from Fanshawe College, London Ontario.
- WETTLAUFER got her nursing diploma from Conestoga College, Stratford Ontario
- WETTLAUFER had a Bachelor of Religious Education from London Baptist Bible College, London Ontario

51) At 10:12 Hrs. I wrote an e-mail to Fanshawe College requesting information on who had control of student records and where those records would be located.

52) At 12:24 Hrs. I read a letter of dismissal issued by Brenda Van Quaethem²⁶ to Beth WETTLAUFER, and dated March 31st, 2014. This letter was obtained through a Production Order for Beth WETTLAUFER's employment records from Caressant Care. The letter indicated the reasons for WETTLAUFER's dismissal, which included the following quotes:

- "On March 26, 2014, I became aware of a serious situation involving a resident (H.D). Upon investigation it became apparent that you had administered the wrong medication to Ms.

²⁶ Brenda Van Quaethem is the Administrator of Caressant Care

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DOIDGE; instead of giving her the medication that had been prescribed for her, you gave her medication that was prescribed for another resident. This then resulted that in her being incorrectly medicated and over-medicated as well. The resident experienced distress as a result of this."

- "At our meeting you acknowledged that this was an error on your part and explained that it was inadvertent. Beth although you have acknowledged this latest error, this is another incident in a pattern of behaviours that are placing residents at risk. You have an extensive disciplinary record for medication-related errors which includes numerous warnings as well as 1, 3 and two 5 day suspensions."
- "As a result of this most recent occurrence, the termination of your employment is warranted. Please be advised that your employment is terminated effective immediately."

53) At 13:16 Hrs. I received an e-mail from Deb STOCKMANN. I learned the following:

- STOCKMANN was the Student Records Team Leader of Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd., London Ontario.
- STOCKMANN had possession and control of the student records of former students at Fanshawe College
- She could be served a Production Order via a scanned e-mail copy to [REDACTED] and would need less than a week to produce the records
- If the police needed any information regarding potential counselling records they'd need to contact Suzanne BOOK in Counselling and Accessibility Services at [REDACTED]

54) On October 25th, 2016, I spoke with Paul BRENNAN. I learned the following:

- He is the Manager of Reports and Prosecution - Professional Standards, at The College of Nurses of Ontario, 101 Davenport Road, Toronto Ontario
- He has access to and control of all records for or pertaining to Beth WETTCLAUFER (Nee: PARKER)
- He would require less than 2 weeks to produce those records for police

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- A scanned copy of a Production Order e-mailed to [REDACTED] would be sufficient for service of a Production Order

REASONABLE GROUNDS TO BELIEVE AN OFFENCE HAS BEEN COMMITTED:

55) Section 235 (1) of the Criminal Code of Canada states: Everyone who commits first degree murder or second degree murder is guilty of an indictable offence and shall be sentenced to imprisonment for life

56) Through the investigation to date and based on the aforementioned paragraphs, I believe that there are reasonable grounds to believe that the offence of murder as described in Appendix "A" of this Information has been committed by Beth WETTLAUFER against the victims James SILCOX, Maurice GRANAT, Helen MATHESON, Mary ZERWINSKI, Gladys MILLARD, Helen YOUNG, Maureen PICKERING and Arpad HORVATH

57) Section 239 (1) (b) of the Criminal Code of Canada states: Every person who attempts by any means to commit murder is guilty of an indictable offence and liable to imprisonment for life

58) Through the investigation to date and based on the aforementioned, I believe that there are reasonable grounds to believe that the offence of attempted murder as described in Appendix "A" of this Information has been committed by Beth WETTLAUFER against the victims Wayne HEDGES, Michael PRIDDLE, Clotilda ADRIANO, Albina DEMEDEIROS, Sandra TOWLER and Beverly BERTRAM

59) My grounds for my belief are as follows:

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REASONABLE GROUNDS TO BELIEVE THE DOCUMENT OR DATA IS IN THE PERSON'S POSSESSION OR CONTROL AND WILL AFFORD EVIDENCE:

60) My grounds for belief are as follows:

- As indicated in paragraphs 45, 46 and 50, two resumes submitted by Beth WETTLAUFER indicated that she obtained her Registered Nurse Diploma at Conestoga College, Stratford Ontario. P.C. LYNCH spoke directly to Janine HOOVER of Conestoga College who told him that she had control of the records at 299 Doon Valley Drive, Kitchener Ontario.
- As indicated in paragraphs 50 and 53, Beth WETTLAUFER's resume indicated that she attended Fanshawe College, and Deb STOCKMANN of Fanshawe College confirmed that she had control of student records at 1001 Fanshawe College Boulevard, London Ontario
- As indicated in paragraph 54, I spoke directly with Paul BRENNAN. He stated that he was the Manager of Reports and Prosecutions - Professional Standards, for The College of Nurses of Ontario, and that he had access to and control of all records pertaining to Beth WETTLAUFER, and that those records were located at 101 Davenport Road, Toronto Ontario.
- These records will show that Beth WETTLAUFER was educated in the administration of medications, including insulin, as well as the effects these medications would have on patients
- These records may show comments or concerns from professors regarding Beth WETTLAUFER's behaviour or work performance

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- These records will show that Beth WETTLAUFER had previous complaints and/or disciplinary action against her regarding her behaviour or actions

CONCLUSION:

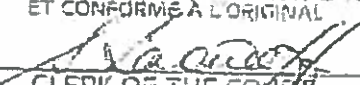
As a result of the information and belief described in paragraphs 1 to 60 the Informant has reasonable grounds to believe and does believe that an offence against an Act of Parliament has been committed, and that documents or data will afford evidence of the commission of the said offences, and that Janine HOOVER - Associate Registrar, Conestoga College, 299 Doon Valley Dr., Kitchener Ontario, Deb STOCKMANN – Student Records Team Leader, Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario, and Paul BRENNAN - Manager of Reports and Prosecutions, The College of Nurses of Ontario, 101 Davenport Rd., Toronto Ontario, have possession or control of the documents or data.

The Informant believes that all the facts and matters set forth in this Information to Obtain are true, notwithstanding any omission on the Informant's part to specifically so state in any one or more of the grounds or elsewhere in the Information.

To the best of the Informant's knowledge, information and belief, Conestoga College, Fanshawe College, and The College of Nurses of Ontario are not under investigation for an offence described in s. 487.014(2).

This Information is sworn for the purpose of obtaining a production order pursuant to section 487.014 of the *Criminal Code*.

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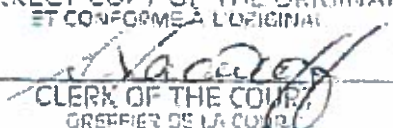
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SEALING ORDER REQUEST:

I am seeking an order under s. 487.3 of the Criminal Code prohibiting access to and the disclosure of any information relating to the production orders sought in this application. I believe that the ends of justice would be subverted by disclosure of this information, or that the information might be used for an improper purpose. My reasons for this belief are as follows:

- I believe that the disclosure of information relating to the production orders sought in this application will compromise the nature and extent of an ongoing police investigation. Disclosure of the methods used by police in this ongoing investigation would seriously impede investigator in completing the investigation, and thereby amount to the subversion of the ends of justice.
- This will likely be a high profile case within the community of Woodstock and Oxford County that is likely to garner Canada-wide media attention, as it involves the murder and attempted murder of multiple helpless victims by someone entrusted to care for them.
- Police are still identifying persons as potential witnesses in this investigation. Persons who know the suspect may be reluctant to speak to police or come forward if they believe their involvement with her will be made public.
- I am also concerned about the possibility that the public disclosure of this information could compromise the fair trial interests of the suspect and/or unnecessarily complicate any trial proceedings. There is a distinct possibility that release of the details of the investigation to the public could contaminate potential jury pools and affect a potential change of venue application prior to trial. A sealing order is in the interests of justice because it will ensure that potential jury members will not be exposed to possible contamination from media sources through the release of this information.


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Accordingly, I believe a sealing order prohibiting access to the said information should be in effect until a court of competent jurisdiction authorizes the release.



D/Cst. Tim Pinder
Woodstock Police Service



Commissioner of Oaths, Province of Ontario


Kathryn Anne Fraser, a
Commissioner, etc., Province of
Ontario, for Woodstock Police
Service. Expires December 8, 2017.

Sworn before me at the City of Woodstock

In the Southwest Region

This 26th day of October, 2016

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APPENDIX "D"

1. **Janine HOOVER - Associate Registrar, Conestoga College, 299 Doon Valley Dr., Kitchener Ontario, Deb STOCKMANN – Student Records Team Leader, Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario, and Paul BRENNAN - Manager of Reports and Prosecutions, The College of Nurses of Ontario, 101 Davenport Rd., Toronto Ontario:** shall produce the above described documents and/or data to **Detective Constable Tim Pinder, a peace officer, at The Woodstock Police Service 615 Dundas St., Woodstock ON, N4S 1E1** as soon as reasonably possible but in any event no later than **14 days** from the date of this order;
2. Any data required to be produced by this order may be produced in electronic form recorded on machine readable electronic storage media or recorded in documents that contain true copies of the data;
3. Any documents required to be produced shall be produced in the form of copies of the said documents certified by affidavit to be true copies;
4. That the Order be executed at **Conestoga College, 299 Doon Valley Dr., Kitchener Ontario, Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario, and The College of Nurses of Ontario, 101 Davenport Rd., Toronto Ontario,** and that the order be picked up at that location by **Detective Constable Tim Pinder or a designate, OR be forwarded through their internal mailing process to Detective Constable Tim Pinder, Woodstock Police Service 615 Dundas St., Woodstock ON, N4S 1E1, OR be sent via facsimile to Detective Constable Tim Pinder, Woodstock Police Service, 519-533-5155, OR be sent via electronic mail to the e-mail address of Detective Constable Tim Pinder: [REDACTED]** in order that the conditions of the Order be complied with.

SUBJECT TO the following terms and conditions:

5. **Janine HOOVER - Associate Registrar, Conestoga College, 299 Doon Valley Dr.,**

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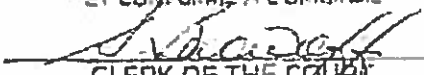

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Kitchener Ontario, Deb STOCKMANN – Student Records Team Leader, Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario, and Paul BRENNAN - Manager of Reports and Prosecutions, The College of Nurses of Ontario, 101 Davenport Rd., Toronto Ontario: shall produce all copies, photocopies, duplicates or certified copies of documents or data in a legible, readable or otherwise accessible and usable form;

6. **Conestoga College, 299 Doon Valley Dr., Kitchener Ontario, Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario, and The College of Nurses of Ontario, 101 Davenport Rd., Toronto Ontario:** shall not destroy or alter any original document or data copied or duplicated and produced unless permitted by order of a Court of competent jurisdiction or until advised by Detective Constable Tim Pinder or a peace officer acting under the authority or direction of that peace officer or acting in good faith in aid thereof, that the investigation of the offences is concluded and that any charges resulting there from have been finally disposed of including all appeals;
7. **Janine HOOVER - Associate Registrar, Conestoga College, 299 Doon Valley Dr., Kitchener Ontario, Deb STOCKMANN – Student Records Team Leader, Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario, and Paul BRENNAN - Manager of Reports and Prosecutions, The College of Nurses of Ontario, 101 Davenport Rd., Toronto Ontario:** shall, upon request and where it is reasonably possible to do so, disclose and provide copies of all or any part of the contents of any document or data required to be produced by this order to Detective Constable Tim Pinder prior to certification and production as otherwise required by this order;
8. **Janine HOOVER - Associate Registrar, Conestoga College, 299 Doon Valley Dr., Kitchener Ontario, Deb STOCKMANN – Student Records Team Leader, Fanshawe College Office of the Registrar, E1012, 1001 Fanshawe College Blvd, London Ontario, and Paul BRENNAN - Manager of Reports and Prosecutions, The College**

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of Nurses of Ontario, 101 Davenport Rd., Toronto Ontario, and any employee, servant or agent shall not directly or indirectly disclose or permit disclosure of the content, existence or operation of this order, in any manner, or to any person except as may be necessary for the purposes of compliance with its terms or obtaining the advice or assistance of legal counsel unless otherwise ordered by a Court of competent jurisdiction;

9. Nothing in this order shall be so construed as to require the production of any data or documents which are subject to solicitor client privilege;
10. Nothing in this order shall be so construed as to require the production of mail unless or until it is delivered or deemed by law to have been delivered to the addressee;

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