

COPY

THE QUEEN'S BENCH
Winnipeg Centre

AFFIDAVIT OF MARLENE LÉGARÉ

I, MARLENE LÉGARÉ, of the City of Pitt Meadows, Province of B.C.,

MAKE OATH AND SAY THAT:

1. I am the second eldest of Lionel Bouchard's nine children. I have lived in B.C. since 1972. As a certified financial planner, I have operated a successful investment and tax preparation business for the past twenty plus years. (Exhibit A)
2. On October 29, 2010, my father applied to obtain new Protection Orders against André (Andy) Bouchard, Lynda Staub and Claire Demery. Prior to that, as a result of my father being unable to travel to attend a hearing on September 16 and 17th, 2010, the three protection orders already in place since October 31, 2009, were set aside. As there had not been any incident since that time, the order was not granted. However minutes later, we were involved in an altercation at the airport. Michelle Staub, Lynda's daughter, who happened to be at the airport security at the same time my father was going through, on her way to Toronto, came over to speak to her grandfather. Minutes later, Lynda Staub stormed in through the airport doors. Livid, Lynda screamed out my name "Marlene" and then proceeded to engage the officer who was accompanying me at the time stating "they've abducted my father". Having already briefed the officers as to our purpose in being in Winnipeg and having just

come from the court house, the officer ordered Lynda to leave. Going against his direct order, Lynda proceeded to talk to the other RCMP members who also had been assisting me in locating my father unbeknownst to me, my father had left the airport fearing Lynda was in the vicinity. (Exhibit B)

3. On January 29, 2006, Andy was arrested at the Holiday Inn in Winnipeg and charged with two counts of theft and two No Contact orders were issued in favour of my father and myself, this after Andy had stolen our cellular phones and other personal property at my father's home in Elie, items recovered in Andy's possession at the time of the arrest at the Holiday Inn. (Exhibit C)

4. Andy proceeded to breach the No Contact by enlisting both Lynda and Claire in physically removing our father from my care in an attempt to have the charges dropped. (Exhibit D)

5. In October 2006, there had been another similar incident at which time Andy Bouchard had physically carried our ailing mother into the RCMP detachment in Stonewall. As evidenced in the video, my mother was not lucid but heavily sedated on morphine as she was making reference to her deceased mother as if in the present. Andy could be seen coaching her to press charges of "attempted kidnap" to prevent her from resuming her treatment at an internationally acclaimed cancer clinic in Houston, Texas, charges which were stayed four months later. (Exhibit R)

6. In the summer of 2008, Andy tried to have my father's lawyer charged with abducting him after being escorted out of his office by two private investigators who drove him to Regina Airport fearing that Andy would try to apprehend his father at the local airport. This drastic measure was taken by my father's lawyer Winston Smith after my father had been held "captive" at Mike Slegers on orders not to go anywhere or talk to anyone without being in the presence of either Mike or Andy until he signed off on the caveats on the property. Andy had ensured that the new van had been locked up in Mike's shed, and a boat and fifth wheel placed in front of it. Andy had taken possession of our father's cellular to ensure he had not contact with his lawyer, myself or my father's sister. (Exhibit E)

7. My father was not allowed to go for coffee with his cousin Jules Chartrand and when Jules' cellular rang, Andy hit Jules' hand and sent the cellular flying across the table. Jules was so incensed at Andy's audacity, that he reported this assault to Headingley RCMP who did not take him seriously. It is evident that there is a very troubling pattern of three false accusations of abduction, and abuse of the legal system for which Andy and Lynda should be held accountable for malicious prosecution, making false statements. (Exhibit F)

8. Further to that, Andy and his sisters have been using the RCMP manpower in that in a period of six weeks, there were 18 investigations on file against me, all with no substance, meant to pressure me to drop the theft charge and to ensure that I had no contact with either of my parents. Andy, whose answer is to commit anyone in his way, said to me at the hospital that Doreen our sister needed to be in a bed next to our father (meaning a psychiatric ward). At the onset, you will note that Andy was trying to get me certified under the mental health act and that he had convinced the rest of his siblings that I had ulterior motives other than the health and well-being of our parents. Refer to the retraction from Leona, of Calgary, who initiated the movement to have me mentally assessed as referenced to in a letter to the RCMP which I saw at the detachment, and from Doreen Bouchard after they realized that Andy had once again used them for his personal agenda, misleading them about the truth of the situation. (Exhibit G)

9. Immediately upon having his power of attorney revoked and being arrested on two counts of theft against my father and myself, with two no contacts in place, Andy commenced a vicious campaign to slander and discredit me with my siblings who he convinced to write letters to Wilder & Wilder, as well as the RCMP, stating that they had been trying "for years" to get me a psychiatric evaluation. Yet the emails I have show that there was no animosity at all until our father was hospitalized. It was only after Andy realized his mistake in informing me of his plans to commit our

father, did he come after me with a vengeance. Andy managed to convince Crown to stay the theft charge, his defense being that it was only a "family dispute".

10. Prior to January 2006, the family got along very well, and we all attended family gatherings held every three years. From January 2006 onwards, it became very obvious from emails that every time I flew out I was a "threat" to Andy. I was being denied my right to ensure the best was being done for both my parents, this after they themselves initiated the call to me. Usually within minutes anytime of arriving in the province, the RCMP were "warned" about me. As soon as I made contact, they wrote down my license plate #, and called it in. It got to the point in order to avoid harassment, I would simply exchange rental vehicles.

11. On one Sunday night, I was interrogated by the RCMP. Andy, along with Lynda, Claire and Doreen were all in my father's tiny two room unit. Despite the No Contact order, Andy who had been parked at the St. Eustache Manor, was that night following me in a dark black van (he usually drives a new white pickup truck). I had been warned not to go down any dark country roads to ensure my safety against Andy, so I had simply pulled into a lit up driveway awaiting the officer. I had also heard some stories from local residents with respect to Andy's vicious temper, how they feared that seeing Andy explode, they were terrified that Andy would strike them. The officer offered to let me in to see my father. However, he came back informing me that my sister Doreen, who was on shift that night, stated that Dad was in bed, when in actual fact, he had been on the telephone minutes earlier.

12. Based on my experience in the financial services field, it did not take me long to determine that my brother had been taking advantage of my father over the years. Lynda told me that the agreement between our father and Andy was only "verbal". Portage Land Titles records indicated that neither a life estate nor a mortgage in favour of our father had ever been registered on title. Later on, at the request of a lawyer when making inquiries on behalf of my father, I was sent back to get

more information and this time I discovered a \$185,000 mortgage on Andy and Angie's properties, a mortgage drawn up two days before my father fell, but registered only on February 13, 2006, the day prior to Andy, Lynda and Claire applying and obviously confident that they would get a peace bond against me. Lynda had once told my step-father that she as a matter of course, often deliberately withheld registering documents to suit herself. (Exhibit H)

13. As I had exposed Andy and what he had relayed in his conversation to me, I was a threat in that I could and did assist my father with \$9,000 of his legal bills. (Exhibit I)

14. Lynda wrote a letter to the Manitoba Public Insurance Company stating that "we believe our sister Marlene Légaré is in need of psychiatric counseling and has been mentally and financially abusing our parents for several years" and that I had flown in "irrationally to Winnipeg over seven times". Yet she does not offer any evidence of her accusations. (Exhibit J)

15. Doreen wrote a letter to the Insurance Council of Manitoba and Andy corresponded with the Insurance Council of B.C. Also at the MFDA hearing, two documents surfaced confirming that Andy had indeed been creating problems for me with my clients. (Exhibit J)

16. It is my opinion that Andy and or my sisters, manipulated my daughter on more than one occasion. Andy was aware that my daughter was familiar with my clients and used her to shed doubt as to my procedures and conduct in handling investments. There are ongoing investigations based on a timely report to the RCMP here in Maple Ridge, complaint received at the time I was to be granted bail, and done deliberately to keep me buried in defense actions based on more false accusations.

17. In June 2006, Andy had my daughter call me up to convince me not to fight the No Contact variation order, to "give up the cause" and to "check myself in" meaning a mental institute.

18. At the hospital in 2006, my mother also told me that that my siblings had been sabotaging my relationship with my children for years to an extent she told me I would not believe. This conversation further confirmed that these siblings were using my very own children to come against me. Andy caused my daughter to cause "doubt" to the investment client and as a result, my licenses were terminated and there is an ongoing hearing. Two documents surfaced at the hearing whereby reference is made to Andy's malicious calls. I was already aware he had been telephoning the dealership in an attempt to end my fifteen year career in the investment and insurance industries.

19. Attached is proof of our father's clear driving record. The call I placed was not "vindictive" as she claims. I had been misled about everything concerning our father. Andy had told the residents of the St. Eustache Manor that my father was no longer allowed to drive and did not have a driver's license. My inquiry was simply to confirm the truth of the matter. I did find out that he indeed did have a driver's license contrary to the rumors Andy was spreading around town.

20. Lynda states correctly that our father had "received a clean medical report as well as a vision test" confirmation that my father did not need 24/7 care. Andy had told the residents of the St. Eustache Manor that our father was in dire need of home support, and could not be left alone, and needed to be amongst friends. Friends could not reach my father as Andy ordered his father not to answer the security buzzer at the door. Andy had installed a huge illegal chain on the inside of his door and ordered our father not to let anyone in. Andy hooked up a land line with an "unlisted telephone #" so that Andy and family members only could reach him, this while Andy controlled his cellular and screened all his calls.

21. In Lynda's letter to the Manitoba Public Insurance, she makes a slanderous remark that I was in need of psychiatric counseling and has been mentally and financially abusing our parents for several

years yet she offers no evidence to this effect. She herself admits in an email that she is financially stressed. Also, Lynda is the sibling that is corresponding with me about our parents health and does not voice any concerns in the least but rather thanks me for my involvement.

22. I have been divorced and not "estranged" from my spouse since 1996, this while he was living at his parents in Elie for a period of one year, not supporting his wife and three teenage children.

23. I have contact with my children and have assisted them financially over the years and paid \$5,000 to my son's lawyer in order that he gained full custody of my grandson Stephen. Countless times prior, and after this, I provided cases of diapers, formula, a bed, car seat, clothing, rent deposit for my son. My son transferred his car into my name fearing he would lose it to his common-law girlfriend of one year. After my divorce, as a birthday present to myself, I paid for four airlines tickets for my children and grandson to go to Elie so that my children could keep in touch with both sets of grandparents. For a family reunion, I flew all my children and my grandson to Manitoba while I drove making it a holiday at the same time. Having a busy schedule tending to client appointments, I had set up telephone banking so that when I received those numerous emergency phone calls for money, I would simply call telebanking and have real time transfers done to assist them. So there is no merit to that statement. However, my mother at the hospital informed me that for years, my siblings had been sabotaging my relationship with my children. After my divorce, my ex-husband contributed, in large part to justify the break-up of the marriage, this while he declared bankruptcy twice after our divorce, unable to run a successful drywall company, this after overcoming his alcohol issues. In reference to Doreen's letter to the Insurance Council, she insinuates there was a sinister plan to get licensed in Manitoba. In fact, I was assisting my husband at the time after the demise of his drywall company, and was assisting him getting set up for sales while living at his parents for a year. (Exhibit J)

24. To cause division between my mother and myself, Andy or my sister deliberately placed a letter on purple stationery in my mother's dresser drawer to make her think that I was planning her funeral. My mother told me that she was upset with me for over five months without even telling me about the letter. It was at the hospital that I soon learned first-hand how smoothly Andy "set-up" people by going through innocent third parties who did not realize they were being used to do Andy's bidding.

(Exhibit K)

25. In another incident, Helene, a sister in Wisconsin, emailed me stating that I had maxed out our mother's credit card \$3,500 without her authorization. When questioning my mother, she stated that it

was an error. This episode caused strife between my sister, my mother and myself until my mother cleared it up stating "it was a mistake". I suspect Andy and Lynda had already commenced ensuring that my mother would no longer speak to me as they had already been sizing up her estate. (Exhibit K)

26. Andy, after being refused a Peace Bond against myself, obtained "No Trespass Orders" that he posted in the Manor. He was made to take it down when residents were in an uproar seeing it posted outside my father's door. (Exhibit K)

27. It is apparent in emails to Winston Smith, my father's lawyer that it was Andy all along who was "controlling" our father. I don't understand how I could be jealous if Dad was recruited off his job driving the grader to drive Andy's combines. I was running a very successful financial planning business in B.C., so moving to Manitoba was not an option. (Exhibit K)

28. These kinds of allegations are par for the course for Andy I was soon coming to realize. My father told me that his sister-in-law, Andy's teacher, had commented to my father how Andy works behind the scenes, causing problems by blaming or using others, which I immediately recognized when Andy shifted the blame from himself to "the family" when Sgt. Gibbs asked him why our father had been moved to which Andy replied "it wasn't me, it was family"! At the onset my siblings were convinced that I was in the wrong based on Andy setting them up to do his bidding. Soon enough they came to realize they had been used and duped by Andy to come against me. (Exhibit K)

29. By the summer of 2007, my father realized everything that he been told to "fear" me was untrue, fabricated to come against me, to separate us so so that he would have no support to get back in his home. My father was inquiring for my telephone number, unaware that there was a No Contact between us. My father told his sister, my godmother Aunt Madeleine Fillion, that Andy was the "biggest crook" around and thief! Madeleine assisted my father in writing a letter to Crown McDuff. Immediately thereafter, my aunt told me that my father did not pursue the matter. It was apparent to her that Crown had informed Andy and Lynda of their father's intentions to seek to remove the No Contact between himself and I. Madeleine was also of the opinion that my father was afraid of the police and that was the avenue Andy had used to intimidate his father into submission. After consulting with my lawyer, I applied for the variations from B.C., one to have contact with my father and the other to stop reporting to their office. (Exhibit L)

30. Susie Waldner, Joe Hofer, John Waldner and Ken Beaudin, local residents, have all witnessed first-hand Andy's vicious, explosive temper when Andy is displeased with something and does not get his way, he gets violent, so one can only imagine how Andy treats his father behind closed doors.

31. While sitting in the Elie coffee shops, local residents approached me on several occasions, informing me that Andy was not well liked at all in the community as he had taken advantage of numerous local farmers in selling them farming equipment,, as he is a commissioned salesperson. I myself learned from one Hutterite that Andy had sold his personal truck to him and Andy reversed the mileage on the truck. The original house is 100 years old which Andy and Angie did not disclose, and denied on the purchase agreement that the basement ever flooded when in fact it did. Cecile Cosyns told me that her husband and son were upset with Andy for selling them a "lemon" haybaler that was expensive and never worked. Another farmer was angry with Andy because Andy misrepresented the year of the combine which cost them an additional \$10,000. Andy sold farm equipment to a farmer in the spring and in the fall repossessed it fully knowing the farmer could not afford it. Andy was fired from the dealership for allegedly stealing from them.

32. While in a relationship with my father and living on the farm, Susie Waldner witnessed time and time Andy screaming at his father. Andy would tear out of the yard in his truck whenever he and his wife had an argument after slamming the house door. Susie said that Andy's wife, Angie, blamed the Hutterites, friends of my father, for driving at excessive speeds through the yard across the bridge to my father's yard, when in fact it was her husband Andy! A friend of my father from Marquette, Archie McRae, charged Andy with reckless driving after his gravel truck was run off the road, when Andy on his cellular, had forgotten he was pulling farm equipment behind his truck, did not move over to allow for the large oncoming truck. Mr. McRae was forced to take the ditch and could have killed himself. It was Andy's arrogant attitude and the fact that there was a witness which caused him to press charges. In court, the astute judge noted that the picture of the road that Andy provided was for a totally different road.

(Exhibit M)

33. Andy and his wife were sued for falsifying documents when they sold their Volkswagen to an unsuspecting couple from Winnipeg and won. Andy appealed and on the grounds that he sold the vehicle "as is". Andy won his appeal. A bumper sticker Andy has on one of his vehicles says it all "the one with the most toys win" and that seems to be his motto and how he operates his life. Having moved to B.C. in 1972, I was not aware of how Andy had been conducting his life and was shocked to

learn from my youngest sister in her emails how Andy had acted inappropriately with her while in their teens. (Exhibit M)

34. As condition to my bail, I was granted permission to visit my ailing mother. Andy and Lynda demanded that the order be varied to include "No Contact" with my mother. It is apparent that they pressured Crown McDuff who called my mother stating that the only way to keep me out of Manitoba was for her to sign an affidavit to that effect. In her conversation with my mother, Crown McDuff agreed three times to pass on a message for me to call my mother, a promise she did not keep I found out inadvertently the day following Mother's Day when trying to get roses delivered to my mother. In my mother's affidavits, mention is made that she may have contact down the road, however, this could not occur without another variation which our mother would most likely be physically incapable of making an appearance in court if required. (Exhibit N)

35. In both my father and mother's cases, I have deliberately signed waivers which I mailed to them so that I would not be accused of prioritizing money over their health. (Exhibit O)

36. Attached is the note my mother gave me to attend the Burzynski Clinic, as well as evidence of my mother's flight reservation. However, after being discharged from the hospital, my mother was warned not to back to the clinic that was in the process of curing her. My mother died a needless and premature death on January 3, 2007. The drug Avastin that she was availing herself was approved on December 17, 2006, three weeks before her death. Lynda had taken her mother from a cancer clinic which boasts of a 93% cure rate to the vitamin company she wholesales for Usana, to their glorified spa facility in Baja, Mexico, a third world country, a facility started by the owner of Usana, where they operate to get a specimen in order to determine how to treat the patient. My mother died of the blockage created by this needless operation as they do not have the PET technology that eliminates this very intrusive procedure, this at a cost of \$41,000. (Exhibit P)

37. To ensure that his mother not go down for treatment to save her life when nothing else could be done for her in Winnipeg, and to ensure he and his sisters not loose anything from her estate,

Andy carried his frail mother into the Stonewall RCMP detachment and in a video statement is seen coaxing her to make the charges, all the while Andy is discussing R.R.S.P.'s etc. clearly more interested in money than his mother's well-being. Also, there are inflammatory, preposterous charges with respect to Marlene "dragging her mother on the floor" and "jumping on her mother's back" as well as the theft of \$10,000 cash in the house which was later recanted, covering her face with a white "mask" and disabling all the phones in the house and still in the process of trying to force his mother off the not to mention a "stolen wig". (Exhibit Q)

38. Andy presented Crown with a list of two dozen individuals that he claims had been urgently requesting assistance for me to obtain psychiatric help. Since that time, I have contacted some of them individuals on that list and the majority of non-family members deny having authorized or even being aware of this "list". Michael Clarke, Andy's lawyer categorically denied allowing his name to stand in fact, he stated he was Andy's lawyer "only for a brief time". (Exhibit R)

39. On February 14, 2006, after Andy losing his bid for Peace Bonds against me, Mr. Clarke had been commissioned to draft "No trespass orders" for the property in Elie, the St. Eustache Manor as well as Andy's home in Portage La Prairie. This order posted on my father's door at the St. Eustache Manor caused a major uproar by the residents, Manitoba Housing ordered the sign be removed. Andy admits in his testimony in court that day, that the complex has an outside security buzzing system, so it was out of sheer malice to keep Marlene from having contact that he initiated this action. (Exhibit K)

40. I have been unable to get hold of Bruce Jamieson who I learned no longer works at the Portage Hospital nor at the Lions Manor. Gary Porteous, one of my father's neighbours, yards away from his home, who I have never met, in calling his wife, stated that she was sure that Gary did not allow his name to stand on the list. On the other hand, did Mariette Leclerc, a resident of the St. Eustache Manor who I met once, denied that she was ever asked to put her name on any such list. My son, Sheldon Légaré, my son, was extremely upset to learn that his name had been used to force his mother to be assessed as condition to obtain bail after almost four months in Winnipeg Remand!

41. Andy makes other allegations that there is a history of family mental illness, that I have been

in need of help for the past five years, and have caused him continuous grief which is most likely the truth as now Andy's plan to commit his father had been exposed after his call to me.

42. In talking to relatives, Andy and some of his sisters called and insisted Marlene not be allowed to visit and to call 911 immediately which offended them. I may be unpredictable, but I was not aware that I had to ask Andy's permission to visit Manitoba and my parents which is basically what Andy was doing is ensuring that I did not communicate with any of them.

43. Under oath during the Peace Bond Application, Andy admits that he has had limited contact with me, so stating that I have no contact with my children is utterly false.

44. Andy states that I commenced legal action on behalf of our father, fully knowing that he commenced the personal injury suit after tricking his father into signing the power of attorney while at the hospital after my father adamantly refused for more than one half hour to sign the document.

45. Having just remortgaged his property two days before his father's fall, Andy saw his father being hospitalized as the perfect opportunity to move him and did put up the property for sale however took the sign down immediately when residents complained.

46. Andy had control and was screening calls to ensure his father had contact with no one. Also Andy states that I had our father discharged five days early when it was in mid day on January 27 and Andy had been planning to move father on the first of the month and he had already been technically discharged pending the first of the month. Andy had not intention of seeing his father go home even for one day.

47. Lynda took off with our father and as our father had gone to the Holiday Inn in my vehicle, that is where the medication was. At no time did I confirm having listening devices. Rather Uncle Laurent Houde and Ben Lachance, who disagreed with father being evicted out of his home, were working with me to try to get him back home. Ben provided me with a pen and paper and all of us stood outside of my father's door. As the complex is built so cheaply, every word could be hear and which conversation I made note of.

48. In Andy's statement "she has erroneously accused family members on several occasions of

trying to kill our father". This is simply referencing as I made it clear to a Dear Abby article provided to me by my father's sister which correctly states that moving an elderly person shortens their life span as their emotions are also affected.

49. As I could not even get close to my father because Andy had him held captive by virtue of not being allowed to drive as a precaution for two weeks, a medical requirement, hence my father was at Andy's mercy. If our father was terrified, it was fear from all the mistrusts he was being told about me stating that I wanted to move in with him, burn his place down, in a lot of trouble in B.C, after his money, etc.

50. Andy then coordinated 24/7 shifts of family members posted in our father's room, and when not available, Andy had a private investigator stay the night.

51. Andy installed, against Manitoba Housing regulations, a very large chain which when the residents complained, Andy was made to remove it.

52. As a Christmas gift, similar to the Alaskan cruise, I had given our father a seven day cruise to the Bahamas, which my siblings refused to tell him about or allow him to go. Uncle Laurent had volunteered to drive my father to the airport if he went.

53. There were never sixteen harassing phone calls as Andy monitored the cellular, so there was no point calling.

54. I fail to see how picture can intimidate someone, unless they are caught in the process of doing something illegal or immoral.

55. Similar to Andy, Lynda and Claire, they all have had loans amongst each other, and with our mother who had invested in their businesses over the years, and had helped Andy purchase his first home.

56. Andy himself had \$150,000 on our father's property and two others on his own of \$111,000 and \$185,000, the later taken out two days before our father's fall, and registered two months later.

57. As I live in B.C., and have no contact with Andy whatsoever, I am hard pressed to fathom how Andy can make a statement that I am having unethical dealings with Senior citizens as we see each other every three years. If anyone is traumatized, it would be Andy after realizing that it was the biggest mistake he ever made, to call me to tell me in advance what his plans for our father's future was and then being exposed for it and being stopped from succeeding in his plan, is indeed very traumatic.

(Exhibit J)

58. By way of reference, I have a letter from my physician as well as an associate and two clients stating that I do not take drugs or use alcohol. There is no way I could maintain a successful business and continue the required mandate of constantly upgrading if I did.

(Exhibit S)

59. As condition for bail, and due to Andy's typed list of individuals again most of whom were not aware their names were included in this listing presented to the magistrate, I was forced to undergo a mental assessment. Dr. Waldman, on page three, stated that the family conflict was initiated by my brother and his intentions to sell the property which their father was living on. The conflict had snowballed to include the rest of the family and resulted in behavior on the part of the entire family that appears to be out of character.

(Exhibit T)

60. I was charged with numerous charges, two assaults, one for an illegal chain, attempted kidnap of my mother, and lastly uttering threats to kill my brother with a gun, this by an inmate on the day that I was making application for bail, keeping in mind that Andy's wife works for Agassiz Youth Centre in Portage La Prairie. By virtue of her connections, I suspect Andy was also behind this last charge similar to all the others. First he didn't want me in the province and then he did not want me to leave, but rather was trying everything he could to have me committed, clearing the way to go after our father afterward!

(Exhibit U)

61. I was denied my rights while in Winnipeg Remand Centre in that I did not view the audio tape used to charge me due to lack of equipment. The transcript was provided to me only after the charges

were stayed. I have not been granted the right to view either since as the statement was viewed quickly as the Centre prior to yet another lock down which cut down my viewing time. (Exhibit U)

62. The inmates at the Portage Women's Jail were all aware that I had booked a flight home for Christmas. Despite the alleged threat against my brother occurring two days prior, the report was not made to the RCMP until the morning of my bail hearing. The charges were eventually stayed.

(Exhibit V)

63. A warrant was issued unbeknownst to me, as I found out through an Aunt, that there was an article in the local newspaper. This is clearly Andy's doing as it makes reference to the fact that I am a grandmother, something the RCMP were never informed on. Also the story with respect to being arrested on the plane, etc., cites "stolen" wig. No mention of the other blue and red wigs that I had also purchased for Hallowe'en at that time were mentioned. I would have to assume that it was Andy who made that false statement to slander me further and cause me embarrassment. (Exhibit V)

64. This paragraph refers to a transcription of a message left on an answering machine in B.C. whereby my ex-husband, who I have had no contact since our divorce, informs an aunt in B.C. who was used to commence another investigation as a former client, that Andy has just called him and that if I pass my mental evaluation, then (sadly), is what he is inferring, then I would be back home...

(Exhibit W)

65. It was not until after the attempted kidnap charges were stayed that I was able to see the transcript of the video whereby my brother is coaching my mother what to say. It was very apparent to me that my mother was not lucid as she was talking about her mother who has been deceased for several years.

(Exhibit W)

66. Andy aggressively used the law and courts in order to ensure charges were laid against me, using family members to do so as he had been charged with two counts of theft from my father and I.

67. Once again, similar to the list demanding immediate mental evaluation, in this list we have of approximately 32 names of Andy's choosing, some of infants and some family members who were not

aware their names had been place as No Contact.

(Exhibit W)

68. As a result of being exiled to B.C. by my children, out of fear of being apprehended by either Mike Slegers, Roland Bouchard, or Lynda or Claire at the funeral, I was unable to say "farewell" to my sister, brother, brother-in-law, other cousins, and friends.

(LIONEL BOUCHARD)

(Exhibit X)

69. My father's lawyer Winston Smith, of Hook & Smith, in reviewing emails between crown and Angie Bouchard, Lynda Staub and Andre Bouchard, makes reference to the fact that in his professional opinion he notes resistance from crown and commented to me that the crown prosecutor was "persecuting me" as opposed to "prosecuting me." My lawyer Mark Wasilyw also noted that "crown was acting more like their lawyer than prosecution".

(Exhibit Y)

70. Since being in B.C., my father has lost a dozen people, one sister, his brother, brother-in-law, other cousins and life-time friends. As my brother had made a point of going to the funeral, or alternatively has sent either Roland Bouchard or Mike Slegers, my father fears once again being apprehended in which case he knows if this ever happens, he can expect Andy to commit him, drug him or worse as Andy is very vengeful, has an explosive temper that he has shown to several individuals. My father believes Andy would think nothing of ensuring my father's demise and even make it appear like a natural occurrence at his age of 87. Also my father vehemently claims that on several occasions he was drugged while in the presence of Andy. My father's memory is excellent. His hearing is the issue at this time until he gets new hearing aids in March which will be covered by W.C.B.

71. The court has to consider what goes on behind closed doors when Andy is in his 87 year old father's presence based on what Andy has proven to do to frighten strangers. When my father was sent to B.C. by his lawyer, I noted that he was now very jumpy at all times and frightened at sudden movements, unlike he had been before he went to Manitoba in May 2008. Susie Waldner and Johnny

Lafreniere's statements confirm that my father was fearful of talking in the presence of Mike Slegers and requested that he and Susie sit in Mike's truck for privacy. Susie told me my father was afraid to speak. Having lived with him for years, she knew instantly by his reaction that some threat had occurred by Andy and/or Mike Slegers where he was living temporarily until he obtains possession of his home. For the reasons stated , and in light of the fact my father is desiring to follow through on his civil claims, in order to do so I am requesting permanent protection orders against Andy Bouchard, Lynda Staub and Claire Demery, who in their own affidavits admit they do not care or want anything to do with their father, yet would like to see him made a ward of the public trustee. (Exhibit Z)

72. I make this Affidavit bona fide and in support of an order from this Honorable Court to impose three non-contestable protection orders in favour of my father as his physical health, emotional peace of mind have been affected and in order to prevent any further harassment similar to what just transpired at the Airport on October 29, 2010. Being entrusted with my father's power of attorney and health proxy, I petition the court to protect my father with new court orders.

SWORN before me at the City
of ^{Maple Ridge}Winnipeg, in the Province of
^{British Columbia}Manitoba, this 8 day of Apr.

2008, 2011

Marlene Légaré
~~XXXXXXXXXXXXXXXXXXXX~~
Marlene Légaré

[Signature]
~~A Notary Public in the and for the
Province of Manitoba~~

~~A Notary Public in and for the Province of
British Columbia~~

WENDY D. WHITTER
Notary Public
22568 Lougheed Highway
Maple Ridge, B.C.
V2X 2V1 467-5313

PERMANENT COMMISSION