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July 8, 2022

**Via Email**

Commissioners MacDonald, Fitch and Stanton  
Mass Casualty Commission

Dear Commissioners:

**Re: Phase 1 Submissions (Goulet Family)**

Please accept the following as the Phase 1 submissions made on behalf of the Goulet Family:

1. 198 Highway 224 Foundational Document (COMM0053831) and Presentation of 198 Highway 224 Foundational Document (Webcast - April 13, 2022)
  - (a) At timestamp 15:28 to 16:00 of the April 13, 2022 Webcast, Commission Counsel references the Joey Webber vehicle that the perpetrator stole and drove from the Shubenacadie Cloverleaf to the home of Gina Goulet. Commission Counsel notes that the perpetrator drove up Gina Goulet's gravel driveway and parked behind her house and one of the outbuildings in what appeared to be a purposeful move to conceal the stolen Webber vehicle from passersby. Commission Counsel further states that the: "position of the vehicle would be obscured by the residence from anyone traveling *down or up* Highway 224." (emphasis added)
  - (b) That statement is only partly correct. The position of the vehicle would be obscured by the residence from anyone traveling south on Highway 224 but it would be visible by anyone traveling north on Highway 224.
  - (c) As noted by both David Butler and Amelia Butler in their Statutory Declarations, the area behind Gina Goulet's home is not visible to vehicles driving southbound from the Cloverleaf toward Exit 9, but the area behind Gina Goulet's home is visible to vehicles driving northbound from Exit 9 toward the Cloverleaf.
  - (d) At paragraphs 20 and 21 of David Butler's Statutory Declaration (COMM0051448), David testifies that as he and Amelia were driving north on Hwy 224 toward Gina's house they spotted a silver SUV parked behind Gina's home behind one of her sheds. He notes that they were able to see behind Gina's house from the perspective of the bend in the road immediately south of 198 Highway 224. He goes on to testify in paragraph 21 that you cannot see behind Gina's house if you are traveling southbound on Hwy 224.

- (e) At paragraph 13 of Amelia's Statutory Declaration (COMM0051449 and COMM0051450), she testifies that: "As we were driving north on Highway 224 towards my mother's house, I spotted a silver SUV parked behind her home, behind one of her sheds. This vehicle was not familiar to me as my mother drives a grey Mazda 3."
- (f) This "bend in the road" referred to by David Butler can be seen at the top of the photograph called "Aerial View (south) of Highway 224" at page 9 of the 198 Hwy 224 Foundational Document. The bend in the road starts just beyond Densmore Rd. The bend in the road is also clearly shown on Figure 3 of the Foundational Document.
- (g) This factual correction is important to the Goulet Family as they continue to struggle to understand why the Webber vehicle could not have been spotted by one of the four occupants of ERT vehicle D21 which drove past 198 Highway 224 at or near the time that the perpetrator was inside Gina's home or by one of the numerous general duty members patrolling the area at that exact time, such as Csts LeBlanc and Pettinger who were setting up a roadblock at Hants East Rural High School about this time. Hants East Rural High School is located on Hwy 2, just 5.2 km from the Goulet home. Why were other members not directed to travel north on Hwy 224 as ERT was traveling south? This seems a lost opportunity to intercept/contain the perpetrator.
- (h) At the time of Gina Goulet's homicide, there didn't seem to be a coordinated RCMP response to position members in locations to contain and intercept the perpetrator. Highway 224 represented a possible containment area given that the 5.5 km stretch of Hwy 224 between the Shubenacadie Cloverleaf and Exit 9 is described by Commission Counsel during the April 13, 2022 Webcast (at timestamp 10:10) as a rural road with few residences, businesses or structures. Further, as can be seen at Figure 3 of the 198 Hwy 224 Foundational Document the access on/exits off this 5.5 km stretch of road are very limited.

## 2. Additional investigation requested

We understand that Halifax Regional Police Chief, Dan Kinsella, has not yet been interviewed by the Mass Casualty Commission. We submit that this represents a significant gap in the Commission's understanding of the police response to the Mass Casualty. It is particularly important for the Goulet Family given that the Enfield Big Stop is located in Halifax County but just inside the Halifax County/Hants County border and the Enfield Big Stop is only 22.1 km from 198 Highway 224.



It is submitted that Nova Scotians have a right to expect that all policing agencies serving Nova Scotians will communicate effectively with each other and work cooperatively with each other to respond to critical incidents occurring in the province – particularly incidents such as the Mass Casualty that spanned a number of jurisdictions over a 13½ hour timeframe.

Respectfully submitted,

**LENEHAN MUSGRAVE LLP**



Jane Lenehan  
JL/bo

cc. Client

