

COGAN & COGAN

BARRISTERS AND SOLICITORS / AVOCATS ET NOTAIRES

BRYCE V. GEOFFREY, B.A., LL.B.

January 13, 1994

WITHOUT PREJUDICE

By Fax 932-2374

Our Ref: 36453

Attention: Jacques Leduc

Leduc, Lafrance-Cardinal
Barristers & Solicitors
340 Second Street East
Cornwall, Ontario
K6H 1Y9

Dear Sir:

RE: Allegations of Sexual Abuse

Further to my letter to you earlier today, I subsequently have had an opportunity to review by telephone your draft press release with my client. He has drawn my attention to a number of additional inaccuracies, which may be summarized as follows:

a) In the second paragraph on page 2 there is reference that "a statement was taken from the complainant". My client indicates that there was a meeting with an officer of the archdiocese of Ottawa however, he did not provide any written statement. I understand that there may have been notes taken by the officer of the archdiocese.

b) In the third full paragraph on page 2 there is the statement that "Monsignor McDougall... made contact with the complainant...". It is my client's information to me that he had initiated contact with Monsignor McDougall on numerous occasions. He does acknowledge that he was invited by Monseigneur McDougall on one of those occasions to meet with a committee.

c) With respect to the allegations in the first paragraph on page 3 my client is adamant that there were no offers of help and assistance made at the meeting on February 9, 1993.

d) With respect to the second paragraph on page 3 it is my client's information to me that he was asked whether or not he had a lawyer however, it was never suggested to him that he get one. In addition, he tells me that the police were never mentioned one.

COMMUNICATIONS:

TELEPHONE (613) 237-4000
TELECOPIER (613) 237-4906
TELEX 653-3105 MSG CTR OTT

REPLY TO:

BANK STREET CHAMBERS
102 BANK STREET
OTTAWA, ONTARIO K1P 5N4

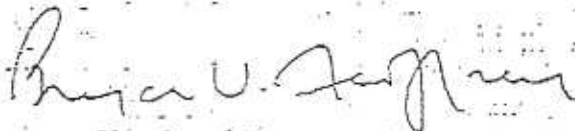
way or the other.

I understand from a telephone conversation that we had during the course of the dictation of this letter that you will agree to certain changes based on the comments as set out above however, you have received contrary information from your client and in fact, have personal information of certain events contrary to my client's version. In the circumstances, I hereby provide you with notice that it may be necessary at a later date to correct certain of these matters through the media.

I look forward to receipt of the revised draft of the press release from your office later this afternoon.

Yours very truly

COGAN & COGAN



Bryce V. Geoffrey

/jmt