

BOARD OF INQUIRY

POLICE SERVICES ACT, 1990

Complainant: D.S.
Involved Officer: Constable Perry Dunlop #76
Cornwall Police Service
OPCC File#: 30019/94
Cornwall P.S.#: C.C.94-01
Board of Inquiry#: CH009/94

AFFIDAVIT OF DR. JOHN BRADFORD

I, Dr. John Bradford, M.B., ChB., D.P.M., F.F. Psych., F.R.C. Psych., D.A.B.P.N., FRCPC, M.A.C. Psych., F.A.P.A., of the City of Ottawa, in the Regional Municipality of Ottawa-Carleton, MAKE OATH AND SAY:

1. I have been a practising psychiatrist since 1976. I presently hold numerous positions, including the Director of the Sexual Behaviours Clinic at the Royal Ottawa Hospital, and a Professor of Psychiatry at the University of Ottawa Faculty of Medicine. My Curriculum Vitae is attached as Exhibit "A" to my affidavit.

2. In 1988 I was elected President of the Canadian Academy of Psychiatry and the Law. I held this position up until 1993.

3. As of October 1993 I became the President of the American Academy of Psychiatry and the Law.
4. Between 1978 and the present, I have given approximately 23 refereed presentations and approximately 5 unrefereed presentations concerning paedophilia and child molesters. Many of these papers dealt with the assessment and treatment of paedophiles.
5. I have written approximately four refereed publications on the topic of paedophilia.
6. Between 1978 and the present I have been interviewed and or quoted in the media on approximately fifteen occasions on the topic of paedophilia. These included interviews with the Fifth Estate, CBC TV - The Journal, CBC TV - Prime Time News, CBC TV - Newsday, CBC Radio - As it Happens, MacLeans (cover story), Australia's 60 Minutes, CTV News, and CTV Midday.
7. I have completed approximately 8 studies on the topic of paedophilia.
8. In 1993 I was a visiting Lecturer at the Columbia Medical Society Scientific Meeting (South Carolina) on the topic of "The Evaluation and Treatment of Paedophilia".
9. My specific work involving priests and paedophilia include the following:
 - (a) In my professional capacity I have treated at least 20 priests, clinically.
 - (b) I have testified in a number of cases involving priests and paedophilia.
 - (c) Between 1991 and 1992 I acted as a consultant to the Working Group of the Canadian Conference of Catholic Bishops in order to assist that Group in proposing guidelines for priests who are involved in sexual abuse.;

- (d) In October of 1993 I participated in a Mock Trial entitled "The Diocese, the Psychiatrist, the Clergyman & his Victims". The mock trial occurred at the annual meeting of the American Academy of Psychiatry & the Law, in San Antonio, Texas;
- (e) In 1990 I took part in a CBC interview on the topic of "Sexuality of Priests";

10. My specific work involving the duty to report child abuse includes:

- (a) I completed a paper entitled "Mandatory Reporting of child sexual abuse: The dilemma";
- (b) In 1986 I gave a seminar to the County of Carleton Law Association Civil Litigation Update entitled "Child Abuse - Legal Obligations of Professionals";
- (c) An appearance on CJOH-TV in 1986 on the topic of "The Child Welfare Act and mandatory reporting of child molesters";
- (d) Quoted in a 1986 article in the *Ottawa Citizen* entitled "Mandatory reporting and treatment of child molesters";

11. In September of 1992 I gave a presentation entitled "Predicting Dangerousness", given at the Royal Ottawa Hospital.

12. Paedophilia involves the recurrent, intense sexual urges or arousal to children 13 years of age or younger which has persisted over a minimum of six months.

13. An individual diagnosed as a paedophile should be at least 16 years of age and there should be at least 5 years between the perpetrator and the victim for the diagnosis to be made.

14. When evaluating paedophilia, it is very important to take into account the gender of the victim of the paedophile. Paedophiles who act out against young males have a high rate of relapse and a high number of victims.

15. In the case of incest, it is more likely that there is only a single victim. This is also true where the activity tends to be more intrusive and involve sexual intercourse.

16. Where a paedophile has established a sexual relationship with adults in a mature way, there is a good prognostic effect in relation to paedophilia.

17. Paedophiles whose primary target would be a female in a non-incestuous situation not only suffer from a number of other paraphilias or sexual deviations but also target young males in addition.

18. Various studies that have surveyed paedophiles have shown that the average paedophile has 50-75 victims in a lifetime.

19. I have reviewed the witness statement provided to me by counsel for Constable Perry Dunlop. In my opinion, if the facts contained in the statement are true, there is a strong likelihood that the priest involved is a paedophile who would continue to victimize young children until, at the earliest, his paedophilia was evaluated and treated.

20. I base the above conclusion on the following:

- (a) the victim was 12 or 13 at the time of the initial sexual assault;
- (b) the priest was more than five years older than the victim;
- (c) the victim was a young boy;

- (d) the paedophilic activity occurred outside of an incest situation;
- (e) I assume that, as a Catholic priest, he has not established sexual relationships with adults in a mature way.

21. I am familiar with the duty to report suspected child abuse placed upon police officers pursuant to section 72(3) of the *Child and Family Services Act*. In my opinion, based upon the witness statement I reviewed, there were reasonable grounds to believe (and, therefore, reasonable grounds to suspect) that one or more children under the age of 16 were presently suffering sexual molestation or sexual exploitation by the priest in question at the time the abuse was reported (which I understand was prior to public disclosure of the allegations).

Sworn before me at the
City of Ottawa
in the *Regional Municipality*
of Ottawa-Carleton on the
31st day of August, 1994

S. J. Shaeen

A Commissioner of Oaths, etc.

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*Stacey Jane Shaeen
a Commissioner, etc., Province of
Ontario, while a student-at-law
Expires: July 18, 1997 *

John Bradford
DR. JOHN BRADFORD

John Bradford