

you to attend at trial today?

A- No, I did not.

307 Q- Have you been asked to bring certain documents to
Court for this hearing?

A- No.

308 Q- So you've never seen the *duces tecum* that has been
issued asking for certain documentation for your
testimony?

A- No, sir.

309 Q- Well, I'm going to present it to you, and you will
see whether you can help me find... locate the
documentation. During the course of your work in
Operation Deception you had occasion to prepare some
handwritten notes of your work?

A- Yes.

310 Q- Did you bring the originals?

A- Yes, I did.

311 Q- May I see them, please?

(Discussion)

312 Q- So, you're showing to the Court a notepad... a small
notepad and a series of pages. For which dates?
That would be February sixteenth (16th), eighty-nine
('89) through to February the nineteenth (19th),

nineteen eighty-nine (1989).

And the notepad would be for which period?

A- February twentieth (20th), nineteen eighty-nine (1989) to February twenty-third (23rd), nineteen eighty-nine (1989). 5

313 Q- Would it be accurate to say that those are the only handwritten notes that you have pertaining to Operation Deception?

A- That is correct.

314 Q- And you never had occasion between, say, nineteen eighty-seven (1987) and the first handwritten notes of February sixteen (16), nineteen eighty-nine (1989) to make other notes of your work? 10

A- Not these type of notes. I've written notes in the file, A5, as you saw. 15

315 Q- Oh okay. The A5s?

A- A5.

316 Q- Understood. We'll come back to the notes in due course when we come to the chronology. But we've asked that you bring with you a copy of the statement that you would have given to the Thai police pertaining to the buy-and-bust that occurred on February the nineteenth (19th), nineteen eighty-nine (1989). And this is referred to in your memo of March three (3), nineteen eighty-nine (1989). Do 20
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you have a copy of that statement?

A- No, I don't.

317 Q- I'll show you your memo, just to give you an aide-
mémoire. Do you recognize a document dated March
three (3), nineteen eighty-nine (1989) called
"Memorandum" issued by the Officer in Charge of
National/International Drug Operations -- that would
be yourself, correct?

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A- Correct.

318 Q- ... addressed to the Officer in Charge of Drug
Operations Branch.

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A- Correct.

319 Q- Who is this person that you wrote it to?

A- Mr. Marcel Coutu.

320 Q- Marcel Coutu. He is at Headquarters, correct?

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A- Correct.

321 Q- Now, I see it bears page number 748. And maybe my
confrère could identify which book that would have
come out of.

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(Discussion)

322 Q- Now, on the fourth page of that memo -- I guess it's
page 751 -- you write the following words, quote:

"I give a statement at the

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NEIL POULIOT
PLAINTIFF
EXAMINATION

(inaudible) **sub-police station** as to
Corporal Flanagan's involvement in
Thailand."

**I have summoned you to bring a copy of that
statement.** Could you help me locate that statement
for purposes of dealing with this record today?

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(Discussion)

323 Q- **Are you telling the Court today that you signed a
statement as a police officer, as a Liaison Officer
for the RCMP** in Thailand and **you didn't keep a copy?**

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A- Not that I didn't keep a copy. **I never received a
copy.**

324 Q- Well, when you sign it, you don't take a copy?

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A- Not in all instances, sir.

325 Q- **And you never asked for a copy?**

A- **No, I did not.**

326 Q- **Why not?**

A- **Because it wasn't complicated.** In my... the
question was asked, "What was Corporal Flanagan
doing there?" And I was saying he was working with
the Thai police in an undercover capacity. No more
than that.

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327 Q- In the same summons I had asked you to bring all

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