

Court File No.

ONTARIO COURT OF JUSTICE
(Central East Region)

BETWEEN:

HIS MAJESTY THE KING

Respondent

-and-

RONALD "RONNIE" TAYLOR

Applicant

**AFFIDAVIT OF RONALD TAYLOR
REGARDING S.7 APPLICATION**

I, RONALD TAYLOR, of the Town of Bracebridge, in the District of Muskoka, in the Province of Ontario, HEREBY MAKE OATH AND SAY AS FOLLOWS:

1. I have personal knowledge of the information herein.
2. Where information has been relayed to me, I verily believe it to be the truth.
3. I have reviewed the disclosure provided by the Crown in this matter to the counsel I have retained, Falls Law Group.
4. On June 21, 2022, I was charged with Assault, Mischief Under \$5000, Utter Threats – Cause Death/Bodily Harm – Spousal, and Fail to Comply with Probation Order.
5. On June 21, 2022, while I was in custody within a cell in the police station, one of the three Officers, believed to be Cst. Anthony, in the cell with me responded to something I said by striking me over and over (seventeen times according to video of what happened).
6. The other two Officers, Officer Singh and Officer O'Conner watched and did nothing to intervene.

7. After that, the Cst. Anthony stood over me while I was hurt and still defenseless, I think to continue to intimidate me, which it did.
8. I had made no physical threat or movement, I was unarmed, I had not done or said anything that could be interpreted as threatening in any way, and I obviously posed no threat to the any of the three officers, who were all armed.
9. I posed no flight risk and was making no attempt to leave, let alone flee, and had no intention to try to leave or flee.
10. I suffered injury, including damage to my nose that is still being assessed.
11. While still in custody, I reported that I was assaulted by the police that resulted in physical injury.
12. I retained Jay Herbert, Falls Law Group to assist in my criminal matter.
13. Falls Law Group requested video of the incident 3 times, on August 4, 2022, October 5, 2022, October 18, 2022.

Attached as Exhibit A are the disclosure requests

14. On December 16, 2022, the cell block video was released to my counsel. It was immediately reviewed and noted that the portions of the video with the assault in the cells was removed.
15. On December 16, 2022, my counsel requested all disclosure, including:
 - a. All video copies from the Bracebridge detachment of the entire time I was in custody including but not limited to the removed sections between 9:31:38 to 10:07:03, along with an explanation as to why that section of the video was removed.
 - b. Notes of all police officers involved
 - c. MacNeil report for all officers involved
 - d. Written reasons for refusal to disclose any of the requested items or other material in the possession of the Crown or other authorities relating to this matter and the persons involved in my case, including those not being disclosed due to lack of relevance.
16. Falls Law Group was told by the Crown that the relevant portion of the video of me in the cell -the time while I was being assaulted- was missing.
17. On November 10, 2022, a News Release from the Special Investigations Unit (SIU) stated that director, Joseph Martino, terminated the investigation based on a review of medical records and so the SIU had no jurisdiction to investigate further.

18. The SIU closed their investigation while the video was still missing, and without considering video of the incident. The SIU advised that they had not received the cell block video.

Attached as Exhibit 'B' is the confirmation of the SIU investigation and closure.

19. On February 9, 2023 and following the closure of the SIU's investigation without charges, the Notes of Officer Anthony were released to Falls Law Group.

Attached as Exhibit 'C' are the notes of Officer Anthony.

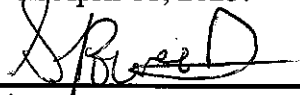
20. The Officer Notes describe what happened to me as "exchange empty hand blows until in cell".
21. This is not accurate and do not reflect what was done to me.
22. Video of the assault, which had been "missing" for more than seven months was found following the closure of the SIU investigation without charges.
23. The two-part video was released to Falls Law Group on March 7, 2023.

Attached as Exhibit 'D' is the Cell Video

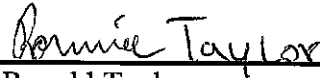
Attached as Exhibit 'E' are still shots of the cell video

24. The video directly contradicts the Officer Anthony's notes, and shows that he hit me hard at least 17 times.
25. I am afraid of officers as they have already beaten me up three times.
26. I am afraid of police officers when I am out in the community and I am afraid of them while I am inside my home, as I have since seen police sitting outside where I live, and I think they are waiting there to watch for a reason to enter my home and/or to arrest me.
27. I am terrified to go back to jail, as I believe I could be assaulted again and I know that video evidence of anything that officers do to me can be hidden.
28. I make this affidavit in connection with an application for production of records in the possession of a third party and for no other purpose.

SWORN before me at the Town of
Bracebridge in the District Municipality of
Muskoka on April 11, 2023.



Commissioner



Ronald Taylor

Stephanie Anastasia Power-Deriss
a Commissioner, etc., Province of Ontario,
for Falls Law Group, a Professional Corporation.
Expires March 29, 2025



255 Manitoba St.
Bracebridge, ON
Rama First Nation
P1L 1S2
Phone: 705-645-3007
Fax: 705-645-3998

August 4, 2022

sent via email

Crown Attorney's Office
3A Dominion Street
Bracebridge, ON P1L 2G2
eservice.bracebridge.crowns@ontario.ca

Kimberly Miles
Agent for the Federal Crown
Bracebridge and Huntsville
14 Sophia Street West
Barrie, ON L4N 1J1
lawclerk@milescriminallaw.com

Dear Sir/Madam or Whom It May Concern,

RE: R. v. Taylor, Ronald
Next Court Date: August 9, 2022

Mr. Herbert is counsel for the above mentioned and is requesting full disclosure in the matter regarding his client.

Our office has not received initial disclosure from the Crown. Please forward any and all disclosure to our office.

Without limiting the generality of the foregoing, we are also requesting the following as soon as possible:

- 1) Copies of the Information and Charge Screening Form;
- 2) the Record of Arrest and copies of all documents used to create the record of arrest in this case;
- 3) notes of all police officers that were involved in this case and/or had dealings with our client;
- 4) complete copies of all statements/utterances, including audio/video statements, made by our client and any witnesses, complainant(s), or co-accused with corresponding transcripts;

- 5) any e-communication, photographic or video evidence, including:
 - a. all video or images of our client in police custody, including but not limited to booking, cell and in-car;
 - b. complete colour copies of any and all photographs or other images or videos taken at the scene of the alleged incident;
- 6) all reports created at the booking of our client, including any reports listing any and all property taken from our client;
- 7) all relevant police emergency service (e.g., police, ambulance, fire) communications with corresponding communication logs, including 911/ dispatch call audio and logs;
- 8) complete copies of the arrest reports and criminal records of the complainant and all other witnesses, including:
 - a. any/all outstanding charges, especially any following from alleged incident or related to this matter;
 - b. previous police reports; and
 - c. any other material affecting credibility;
- 9) any/all disclosure provided to any witnesses in this matter;
- 10) all information, including any reports filled out, with respect to searches done on or pertaining to our client, including while in police custody and strip searches, and including copies of any Information to Obtain or any search warrants in this matter; and
- 11) if applicable, written reasons (e.g., inventory with justifications) for refusal to disclose any of the requested items or any other material in the possession of the Crown or other authorities relating to this matter and the persons involved in this case, including those not being disclosed due to lack of relevance.

Mr. Herbert reserves the right to make a further disclosure request at or following any Resolution Hearing regarding the subject matter.

If you require any further information or clarifications, please contact Mr. Herbert immediately. Thank you for your attention to this matter.

Sincerely,

Carolyn Rock, on behalf of
Jay Herbert



255 Manitoba St.
Bracebridge, ON
Rama First Nation
P1L 1S2
Phone: 705-645-3007
Fax: 705-645-3998
www.fallslaw.ca

October 5, 2022

sent via email

Crown Attorney's Office
3A Dominion Street
Bracebridge, ON P1L 2G2
eservice.bracebridge.crowns@ontario.ca

Kimberly Miles
Agent for the Federal Crown
Bracebridge and Huntsville
14 Sophia Street West
Barrie, ON L4N 1J1
lawclerk@milescriminallaw.com

Dear Sir/Madam or Whom It May Concern,

RE: R. v. Taylor, Ronald
Next Court Date: October 18, 2022

Mr. Herbert is counsel for the above mentioned and is requesting further disclosure in the matter regarding his client.

Without limiting the generality of the foregoing, we are requesting the following as soon as possible:

- Complete copies of all video from the Bracebridge detachment of the entire time our client was in custody;

Sincerely,

Carolyn Rock, on behalf of
Jay Herbert



255 Manitoba St.
Bracebridge, ON
Rama First Nation
P1L 1S2
Phone: 705-645-3007
Fax: 705-645-3998
www.fallslaw.ca

October 18, 2022

sent via email

Crown Attorney's Office
3A Dominion Street
Bracebridge, ON P1L 2G2
eservice.bracebridge.crowns@ontario.ca

Kimberly Miles
Agent for the Federal Crown
Bracebridge and Huntsville
14 Sophia Street West
Barrie, ON L4N 1J1
lawclerk@milescriminallaw.com

Dear Sir/Madam or Whom It May Concern,

RE: R. v. Taylor, Ronald
Next Court Date: October 25, 2022

Mr. Herbert is counsel for the above mentioned and is requesting further disclosure in the matter regarding his client.

Our office has requested and is currently awaiting further disclosure, including but not limited to the following, which is requested to be provided before the next court date (October 25, 2022), in order to allow for scheduling of trial dates:

- Complete copies of all video from the Bracebridge detachment of the entire time our client was in custody.

Sincerely,

Carolyn Rock, on behalf of
Jay Herbert



255 Manitoba St.
Bracebridge, ON
Rama First Nation
P1L 1S2
Phone: 705-645-3007
Fax: 705-645-3998
www.fallslaw.ca

December 16, 2022

sent via email

Crown Attorney's Office
3A Dominion Street
Bracebridge, ON P1L 2G2
eservice.bracebridge.crowns@ontario.ca

Dear Sir/Madam,

RE: R. v. Taylor, Ronald
Next Court Date: December 20, 2022

Mr. Herbert is counsel for the above mentioned and is requesting further disclosure in the matter regarding his client.

Our office is in receipt of the further disclosure provided by your office on December 15, 2022. Mr. Herbert requires the following disclosure:

- 1) ALL video copies from the Bracebridge detachment of the entire time our client was in custody, including but not limited to:
 - a) removed sections between 9:31:38 to 10:07:03;
 - b) along with an explanation as to why this section of the video was removed.

Sincerely,

Stephanie Power

Stephanie Power, on behalf of
Jay Herbert



255 Manitoba St.
Bracebridge, ON
Rama First Nation
P1L 1S2
Phone: 705-645-3007
Fax: 705-645-3998
www.fallslaw.ca

March 9, 2023

sent via email

Crown Attorney's Office
3A Dominion Street
Bracebridge, ON P1L 2G2
eservice.bracebridge.crowns@ontario.ca

Dear Sir/Madam,

RE: R. v. Taylor, Ronald
Next Court Date: December 20, 2022

Mr. Herbert is counsel for the above mentioned and is requesting further disclosure in the matter regarding his client.

The following disclosure is required as soon as possible:

- 1) MacNeil report for all officers

If you require any further information or clarifications, please contact Mr. Herbert immediately. Thank you for your attention to this matter.

Sincerely,

Stephanie Power

Stephanie Power, on behalf of
Jay Herbert

[HOME](#) ▶ [MEDIA CENTRE](#)

News Release

News Release

SIU Discontinues Investigation into Man's Arrest, Injury in Bracebridge

Case Number: 22-PCI-178

Mississauga, ON (10 November, 2022) ---

The Director of the Special Investigations Unit, Joseph Martino, has terminated an investigation into the arrest and injury suffered by a 30-year-old man involving Ontario Provincial Police officers in June.

Based on the SIU's preliminary inquiries, the man was arrested on June 21, 2022 in relation to a reported assault involving his girlfriend. Following a stay in hospital where he was treated for a serious hand injury suffered prior to his arrest, the man was taken to the Bracebridge detachment and put in a cell. The man was then involved in a physical altercation with several officers while at the station where he reportedly suffered a nose injury.

Based on a review of medical records, Director Martino was not satisfied that the man suffered a broken nose or any other serious injury within the terms of the SIU's statutory mandate. Accordingly, the SIU was without jurisdiction to investigate further and the file has been closed.

The SIU is an independent government agency that investigates the conduct of officials (police officers as well as special constables with the Niagara Parks Commission and peace officers with the Legislative Protective Service) that may have resulted in death, serious injury, sexual assault and/or the discharge of a firearm at a person. All investigations are conducted by SIU investigators who are civilians. Under the Special Investigations Unit Act, the Director of the SIU must

- *consider whether the official has committed a criminal offence in connection with the incident under investigation*
- *depending on the evidence, cause a criminal charge to be laid against the official where grounds exist for doing so, or close the file without any charges being laid*
- *publicly report the results of its investigations*

Kristy Denette, siu.media@ontario.ca

SIU Communications/Service des communications, UES

MEDIA CENTRE

▶ [Media Centre](#)

▶ [News Releases](#)

▶ [Status of SIU Cases](#)

▶ [Breakdown of Occurrences](#)

▶ [SIU on Twitter](#)

▶ [Name Release Policy](#)

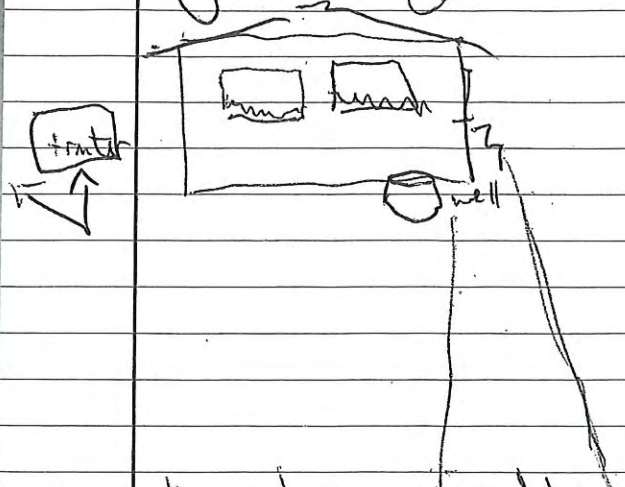
125

Widgord
1496 Peterson Rd

domestic 7.0m
Emily Wood says
ex Ron Wood
assaulted her, H&D,
smashed out
windows in (N)
damaged car.

- ew.
- Atz. - windows
in front of
res. Smashed
out. Multiple
trailers on property
- no answer at
door
- later to check on³

- occupant.
- large flat screen TV on floor.
- glass everywhere

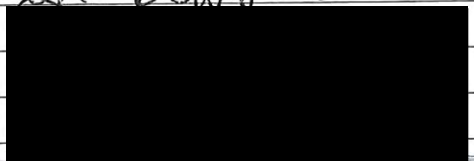


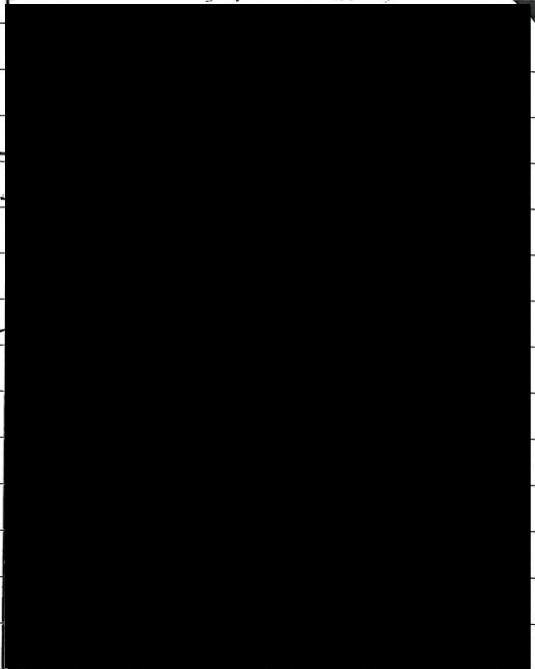
- two days night no answer.
- (20) car coming in

driving

- make inquiries to hand. EMT at scene
- Aunt/owner at scene says nephew is Ron he gets cancer when drinking. Beat up his girlfriend and smashed up car and house.
- leaving with EMT Meyer on board.

155





10/19

- Disturbance in
cells Room
Taylor & ...

pc Singh refusing
pressur logs,
remove id card
search.

- stopped going into
cell
- pushed toward
cell

- squealed off

- struck in mouth

- exchange empty
hand black

with in cell

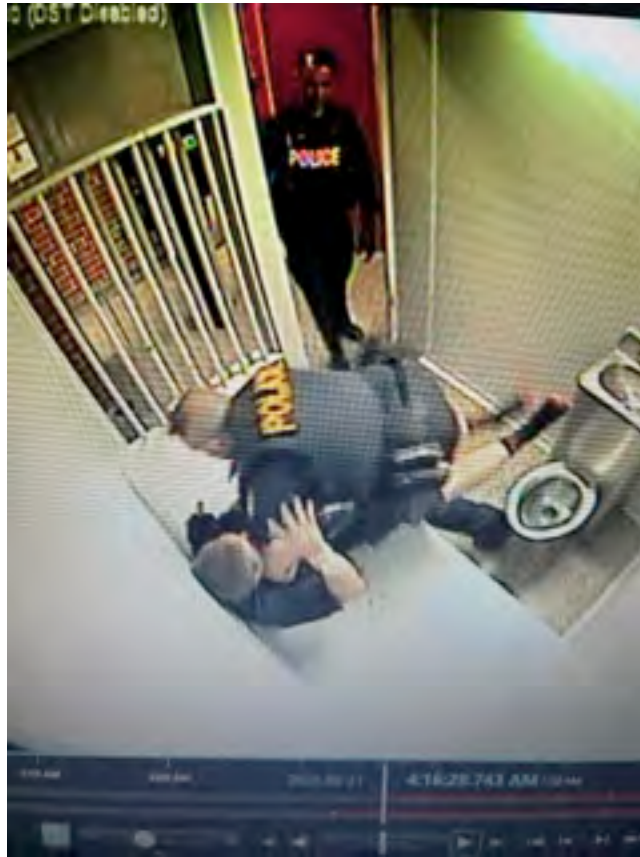
- back away

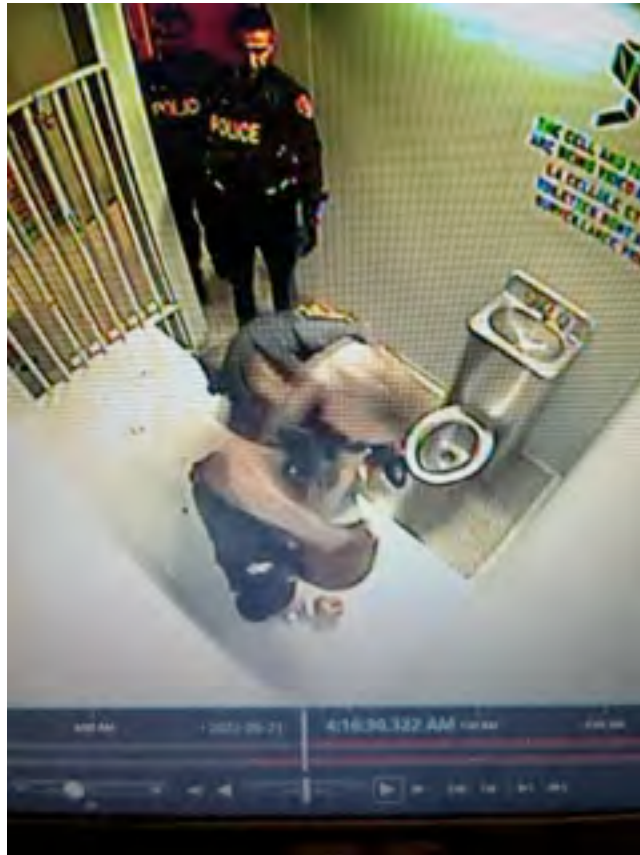
with ...

- notes

4:30 off duty

EXHIBIT D – DIGITAL VIDEO – FILED BY USB WITH THE
COURT











ONTARIO COURT OF JUSTICE

CENTRAL EAST REGION

BETWEEN:

HIS MAJESTY THE KING

Respondent

- and -

RONALD TAYLOR

Applicant

AFFIDAVIT OF RONALD TAYLOR

SWORN APRIL 11, 2023

Jay Herbert
Barrister and Solicitor
Falls Law Group
255 Manitoba Street
Bracebridge, ON P1L 1S2
Phone: (705) 645 3007
Fax: (705) 645 3998
jay@fallslaw.ca
LSO 59310G
Counsel for the Applicant