



**OTTAWA POLICE SERVICE  
SERVICE DE POLICE D'OTTAWA**

*Working together for a safer community  
La sécurité de notre communauté, un travail d'équipe*

P.O. Box 9634, Station T  
Ottawa, Ontario K1G 6H5  
Tel.: (613) 236-1222  
Fax: (613) 236-9360

C.P. 9634, Succursale T  
Ottawa (Ontario) K1G 6H5  
Tél.: (613) 236-1222  
Télééc.: (613) 236-9360

ottawapolice.ca

March 13, 2007

**BY HAND**

Internal Inquiry in the Actions of  
Canadian Officials in Relation  
to Abdullah Almaki, Ahmad Abou-Elmaati  
and Muayyed Nureddin  
P.O. Box 1208, Station "B"  
Ottawa, ON K1P 5R3

To Whom It May Concern:

**Re: Internal Inquiry in the Actions of Canadian Officials in Relation to  
Abdullah Almaki, Ahmad Abou-Elmaati and Muayyed Nureddin**

Please find enclosed the Ottawa Police Service Motion Record in the above-noted matter. At this time, the Ottawa Police Service does not seek to make oral submissions relating to its motion for standing, unless so requested by the Commissioner.

If you have any concerns with the above, please contact the undersigned at your convenience.

Yours very truly,

Vincent Westwick  
General Counsel  
(613) 236-1222 ext. 5990

**IN THE MATTER OF INTERNAL INQUIRY IN THE ACTIONS OF  
CANADIAN OFFICIALS IN RELATION TO ABDULLAH ALMALKI,  
AHMAD ABOU-ELMAATI AND MUAYYED NUREDDIN**

**IN THE MATTER OF ORDER OF COUNCIL P.C. 2006-1526,  
MADE PURSUANT TO THE INQUIRIES ACT: INTERNAL  
INQUIRY IN THE ACTIONS OF CANADIAN OFFICIALS IN  
RELATION TO ABDULLAH ALMALKI, AHMAD ABOU-  
ELMAATI AND MUAYYED NUREDDIN**

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**MOTION RECORD**

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Dated: 12 March, 2007

**OTTAWA POLICE SERVICE**

Legal Services  
474 Elgin Street  
Ottawa, ON  
K2P 2J6

Vincent Westwick  
LSUC No.: 24850R

Tel: (613) 236-1222 ext. 5990  
Fax: (613) 760-8127

**IN THE MATTER OF INTERNAL INQUIRY IN THE ACTIONS OF  
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**MOTION FOR STANDING BY THE  
OTTAWA POLICE SERVICE**

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**TAKE NOTICE** that a motion is hereby made to the Commissioner pursuant to Part C of the Rules of Procedure and Practice Respecting Participation and Funding of the Commission of Inquiry for an order granting the Ottawa Police Service (OPS) standing before the Inquiry with participatory rights as the Commissioner may deem appropriate;

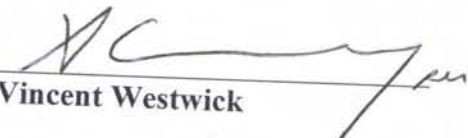
**AND TAKE FURTHER NOTICE** that in support of this application will be read the affidavit of Deputy Chief Sue O'Sullivan, sworn on March 12<sup>th</sup>, 2007 and such further and other materials as the Commissioner may permit;

**AND TAKE FURTHER NOTICE** that the said motion shall be made on the following grounds:

1. The Ottawa Police Service participated in the investigation about which the Inquiry is focused.
2. Ottawa Police Service officers performed duties and participated in the investigation about which this Inquiry is focused.
3. The Inquiry's findings and recommendations may impact on the Ottawa Police Service and / or its employees.
4. The Inquiry's findings and recommendations may impact on the role and contributions of the Ottawa Police Service in future investigations.

5. The Ottawa Police Service makes this motion in writing and does not seek to make oral submissions relating to its request for limited standing, unless so requested by the Commissioner

**DATED** at Ottawa, Ontario this 12<sup>th</sup> day of March, 2007.

  
**Vincent Westwick**

Ottawa Police Service  
Legal Services  
474 Elgin St.  
Ottawa, ON  
K2P 2J6

Tel (613) 236-1222 ext. 5990  
Fax (613) 760-8127

e-mail: [vwestwick@ottawapolice.ca](mailto:vwestwick@ottawapolice.ca)

To:  
Internal Inquiry in the Actions of Canadian Officials in Relation to  
Abdullah Almalki, Ahmad Abou-Elmaati, and Muayyed Nureddin  
P.O. Box 1208, Station B  
Ottawa, ON  
K1P 5R3

Fax (613) 992-2366

e-mail: [inquiry.admin@bellnet.ca](mailto:inquiry.admin@bellnet.ca)

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**AFFIDAVIT OF DEPUTY CHIEF SUE O'SULLIVAN**

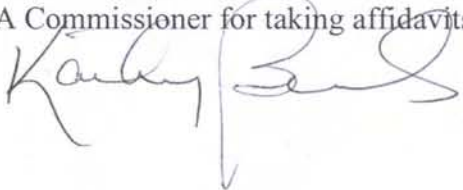
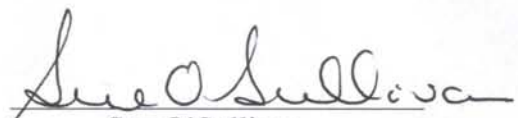
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I, Sue O'Sullivan, of the City of Ottawa, in the Province of Ontario, **MAKE OATH  
AND SAY:**

1. I am the Deputy Chief of Police of the Ottawa Police Service and was so during the period of the investigation about which this Inquiry has been called and as such have knowledge of the matters hereinafter deposed.
2. The Ottawa Police Service is the police service of original jurisdiction in the City of Ottawa and provides law enforcement services within the National Capital Region. The Ottawa Police Service has over 1,800 employees, of which 1,200 are sworn peace officers.
3. The Ottawa Police Service was involved in the investigation about which this Inquiry is focused.
4. The Ottawa Police Service contributed investigating officers to the investigation about which this Inquiry is focused.
5. The Ottawa Police Service is seeking standing to represent the interests of the Ottawa Police Service.

6. If granted standing, the Ottawa Police Service will:
  - a. Monitor the proceedings;
  - b. Assist the Commissioner and Commission Counsel with evidence and information; and
  - c. If necessary and agreed to by the Commissioner, present evidence relevant to issues which may arise.
  
7. The Ottawa Police Service had standing at the Arar Inquiry and contributed to that Inquiry and its deliberations.
  
8. It is entirely likely, given the fact that the Ottawa Police Service is responsible for policing the National Capital Region, that the Ottawa Police Service will, in the future, participate in investigations of matters of national security or other matters of a similar nature. Therefore, as a learning institution, the Ottawa Police Service needs to benefit from any lessons learned throughout the Inquiry.
  
9. The lawyer acting on behalf of the Ottawa Police Service would be Vincent Westwick, General Counsel to the Ottawa Police. Mr. Westwick performed a similar role for the Ottawa Police Service in respect of the Arar Commission and has a current "Top Secret" security clearance valid until 2009. The Security Screening Certificate, dated 28 October 2004, is attached hereto as Exhibit "A".
  
10. The Ottawa Police Service understands that if standing were to be granted it would be limited in scope and the Ottawa Police Service agrees to abide by any limitation and / or restrictions that may be placed upon it.

SWORN BEFORE ME at the City )  
 Of Ottawa in the Regional )  
 Municipality of Ottawa-Carleton )  
 on the 12<sup>th</sup> day of March, 2007 )  
 Kathleen Ann Burns, a Commissioner, etc., )  
 City of Ottawa, for Ottawa Police Service. )  
 Expires September 3rd, 2008. )  
 A Commissioner for taking affidavits )

Sue O'Sullivan

SECURITY SCREENING CERTIFICATE AND BRIEFING FORM

CERTIFICAT D'ENQUÊTE DE SÉCURITÉ ET PROFIL DE SÉCURITÉ

SEE REVERSE FOR PRIVACY ACT STATEMENT AND COMPLETION INSTRUCTIONS. VOIR VERSO POUR ÉNONCÉ CONCERNANT LA LOI SUR LA PROTECTION DES RENSEIGNEMENTS PERSONNELS ET DIRECTIVES.

PLEASE TYPEWRITE OR PRINT IN BLOCK LETTERS. PRIÈRE DE DACTYLOGRAPHIER OU D'ÉCRIRE EN LETTRES MOULÉES.

Reference No. - N° de référence: Departmental/Organization No. N° du ministère/de l'organisation: RCMP; File number - N° de dossier: 2004-2552; A COL: [redacted]; DOB: 51-09-19

PART A TO BE COMPLETED BY SECURITY OFFICE - PARTIE A À REMPLIR PAR LE BUREAU DE SÉCURITÉ

Surname: WESTWICK; Full given names: ROBERT VINCENT; Department/Organization: RCMP; Unit/Branch: OUTSIDE POLICE / GENERAL COUNSEL

Initial briefing or reactivation: [checked]; Change in security requirement: [unchecked]; Termination: [unchecked]

AUTHORIZED LEVEL OF INDIVIDUAL: NIVEAU AUTORISÉ DE LA PERSONNE; Reliability status: [unchecked]; Site access: [unchecked]; Level - I (CONFIDENTIAL): [unchecked]; Level - II (SECRET): [unchecked]; Level - III (TOP SECRET): [checked]; Other (specify): [checked]; OUTSIDE POLICE

I, the undersigned, as the authorized security official, do hereby certify that the above information has been verified and the requested level is granted.

Signature: [Signature]; Date: 04/10/28

Name and title of authorized security official: PERSONNEL SECURITY UNIT CENTRAL UNIT; Office address: 155 MCARTHUR AVE RM405 VANIER ON; Telephone: (613) 993-0374; Facsimile: (613) 993-3143

PART B BRIEFING SUMMARY - PARTIE B SOMMAIRE DE LA SÉANCE D'INFORMATION

The individual named herein is authorized access to the level of information/assets indicated above when there is a work related need. La personne nommée dans la présente a le droit d'accès aux renseignements et aux biens au niveau indiqué ci-dessus lorsque cela est nécessaire à l'exercice de ses fonctions.

PART C ACKNOWLEDGEMENT - PARTIE C ACCEPTATION

I understand and agree to comply with the above statutory and administrative requirements. Je comprends et j'accepte de respecter les exigences législatives et administratives précitées. Signature of individual: [Signature]; Date: 04/10/28

PART D BRIEFING OFFICIAL - PARTIE D REPRÉSENTANT QUI A DONNÉ LA SÉANCE

Name and initials: CELINE Groulx; Title: Security Analyst; Signature: [Signature]; Date: 04/10/28



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MOTION RECORD

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