

Shubenacadie

Foundational Document: Addendum and Erratum

Prepared by: Counsel for the Mass Casualty Commission

Exhibit Version

Shubenacadie Foundational Document: Addendum and Erratum

NOTE: This document is based on an analysis of materials available to the Mass Casualty Commission <u>as of July 5, 2022</u>. Further production and investigation are ongoing. In addition, foundational documents should be read and understood in light of, and in conjunction with, hearing testimony received by the Commission.

The *Shubenacadie* Foundational Document was exhibited on April 11, 2022, in the Mass Casualty Commission's public proceedings.

Addendum

The following documents will be tendered into evidence to supplement the existing record with respect to the events and information described in the *Shubenacadie* Foundational Document:

1. Handwritten notes of Cst. J. Daley: COMM0056144; COMM0056144; COMM0056144

The RCMP provided the Mass Casualty Commission with the handwritten notes of Cst. Jared Daley. These notes (COMM0056143; COMM0056144) will be tendered into evidence.

2. GPS data of vehicle 53a03, driven by Cst. J. Daley: COMM0056141

The RCMP provided the Mass Casualty Commission with the GPS data of the vehicle driven by Cst. Jared Daley on April 19, 2020. These data (COMM0056141) will be tendered into evidence.

3. ESDC Statement of Cst. C. Gibson: COMM0054289

On November 30, 2020, Cst. Chris Gibson provided a statement to investigators with Employment and Social Development Canada's Labour Program. This statement (COMM0054289) will be tendered into evidence.

4. ESDC Statement of Cst. A. Comeau: COMM0054288

On December 1, 2020, Cst. Austin Comeau provided a statement to investigators with Employment and Social Development Canada's Labour Program. This statement (COMM0054288) will be tendered into evidence.

5. Photographs provided by Kaitlyn Keddy

The RCMP provided the Mass Casualty Commission with photographs of the Shubenacadie cloverleaf scene obtained from Kaitlyn Keddy. These photos are available to the Participants via specific request; they are not all being provided to the public due to their graphic content.

Erratum

The following error in the *Shubenacadie* Foundational Document has come to the attention of Commission Counsel:

1. Figure 11 - Highway 212

In Figure 11, the road highlighted in yellow is labelled as "Hwy. 212" and the checkpoint is labelled as "Hwy. 212 & Grove Rd". While this road is Highway 212, the Foundational Document refers to the road by its street name "Old Guysborough Road", as opposed to its highway number, throughout. The map's labels should read "Old Guysborough Road" and "Old Guysborough Rd & Grove Rd".