

EXHIBIT 4.3 to DELENA LOWERY'S  
AFFIDAVIT 04/20/2009

IN THE COURT OF APPEAL FOR SASKATCHEWAN  
C.A. 1605 of A.D. 2008  
(QBG. 1306 of A.D. 2005)

BETWEEN:

ARLENE LOWERY

APPELLANT  
(PLAINTIFF)

- and -

CHARLENE DOBSON  
JONATHAN DOBSON, *Leslie and Lyle*

INFANT CHILDREN APPELLANTS (PROPOSED)  
INFANT CHILDREN PLAINTIFFS (PROPOSED)

- and -

SASKATCHEWAN GOVERNMENT

RESPONDENT

(DEFENDANT)

- and -

GOVERNMENT OF CANADA

RESPONDENT (PROPOSED)

DEFENDANT (PROPOSED)

- and -

JOYCE LAPRISE

RESPONDENT (PROPOSED)

DEFENDANT (PROPOSED)

- and -

DR. S. LEIBEL, M.D., DR. L.P. RUTHNUM, M.D.  
DR. E. IVANOCHKO (REG. PSYCHOLOGIST),  
CITY OF REGINA POLICE DEPARTMENT,  
CHIEF CAL JOHNSTON, CORPORAL DEBBIE FERGUSON

RESPONDENTS  
(DEFENDANTS)

**AFFIDAVIT OF CHARLENE DOBSON**

**In Support of her Request for An Independent Judicial Review**

As per Court of Queen's Bench Rules of Practice and Procedure  
Rule 664(1) (2.a.); and Demonstrating sufficient interest as per rule 665 (1.)

I, CHARLENE LOWERY, of the City of Regina, in the Province of Saskatchewan, MAKE OATH AND SAY THAT:

1. I have read my grandma's affidavit dated April 20, 2009 and am in agreement with what she has relayed to you and requested.
2. I hereby request this court to grant me permission to act on behalf of myself for Part Two of the Amended Claim Part Two (fresh) copy.
3. Further I request that I be a part of any court proceedings, assisting my grandma, Arlene Lowery, and her, I, as joinder's to the above mentioned portion, and not just on behalf of myself but my siblings named here as infant children plaintiffs (proposed) or appellants (proposed).
4. I have attached a testimony which I did for the court to request a leave to perfect an appeal for this lawsuit which was denied.
5. Nothing too much has changed except to say that I am healing and my psychologist Laurel Phillips and Dr. Haque agree that for me to bring these matters relating to myself when I have recovered from my bout of having experienced some residual effects of Post Traumatic Stress Disorder (PTSD) that it will be in my best interests.
6. I see Dr. Haque again in June, 2009 and I expect the report to be good.
7. If all is well, I anticipate that I will be able to represent myself, and if not my grandma will still be able to do it for me.
8. I make this Affidavit to humbly request of this Honourable Court, to grant to me (and Arlene Lowery) an extended period of time to prepare and file an application for an independent judicial review for the portion I am interested in, and my 3 siblings, that being QBG. 1306 of A.D. 2005; that being September 01, 2009 or as soon thereafter.

and in the event that following this independent judicial review, should this Honourable Court still deem fit, or necessary to perfect this appeal, I will assist Arlene Lowery with the perfecting of this portion of it at that time.

SWORN before me at the City of )  
Regina, in the Province of )  
Saskatchewan, this 20 day of )  
April, 2009. )

*crak* )  
SIGNATURE

*crak* )  
A COMMISSIONER FOR OATHS )  
In and for the Province of Saskatchewan )  
My Commission expires: July 31, 2013.

*Charlene Deaton*

A Commissioner for Oaths in and for  
Saskatchewan  
My commission expires July 31, 2013

Testimony of Charlene Marie Dobson.

My name is Charlene Marie Dobson and I am 13 years old.  
I promise to tell the truth and to the best of my ability.  
I wrote this and asked my grandma a few questions but  
everything in here is true and I have knowledge of it.

Concellor Debbie Hooper and I had discussed on this and I was  
given permisson to write this for the court case and I was also  
able to testify as to what happened to Jonathan and myself when  
I lived with my mother. Destiny Dobson

I am wanting to be added with my grandma, to her court case.  
My sister and brother are too small but they can not remember  
much as they were too little.  
I remember about all of the pictures that my grandma is giving  
the court. They are pictures that I drew and know about what  
happened. I drew lots more pictures back then but some are  
missing and grandma told me that some are with Dr. Farthing  
and Laurel Phillips.

I have had a very hard time dealing with all of this but I am  
much better thanks to my counselors, Laurel Phillips and Debbie  
Hooper and grandma and grandpa. I am doing Art Therapy  
with Debbie I am not able to remember all of what my grandma  
has written about what I said to her when I was little, but I  
remember most of it, 75 % of it.

I do remember everything about the real bad stuff, like the  
killing of the babies and mommy burning me tied in the chair. I  
remember about her tying Jonathan and I up and leaving us  
alone and I had to take care of him. All of that is true and really  
happened.

page two

In the pictures grandma gave you, I am afraid for my mommy and my baby brother, Jonathan and am trying to save my brother.

The drawings that grandma gave you, that happened, I want to forget it forever, and I think this court case will help me do that.

I don't want to come back later and remember again and I don't think my memories will be better when I am older.

My grandma has helped me from the beginning and I want her with me when I do this and I want Laurel and Debbie there too.

I hope the court will add my brothers Jonathan and Lyle and sister Leslie to this court case because I do not want them to have to go over this really bad stuff. I want them to have a happy life the same as me.

It will be hard for me to talk about this but I feel I need to and it will help me also.

Other things you should know.

(1) When I came to live with my grandparents I was the age of four years and three months old.

(2) On that day I remember I had to leave Jonathan my brother with my mom Destiny Dobson for a few days. After 2-3 days my brother Jonathan came to live with my grandparents and I.

(3) I went to live with my grandparents because when I did live with my mom we would get hurt from her and her friends.

(4) I remember when I was little <sup>(AUNT)</sup> <sup>(DADDY)</sup> Vonda Dillon, my mom, Uncle Victor and <sup>Damian</sup> hurting us. <sup>my brother, cousins and I up and</sup>

(5) When Jonathan and I lived there Jonathan was tied up and burnt.

(6) When I was getting hurt my cousin's were too. there names were ~~and~~ and ~~and~~.

(7) Now that I live with my grandparent Arlene and Chuck Lowery and one sister Leslie (6) and two brothers Jonathan (9) and Lyle (3) I feel a whole lot better when my family is around me. We have two pets that we are raising right now too.

(8) My sadest parts in my life are when I was getting hurt with when I was a little girl and when I lied with my mom Destiny. The other part that was sad is when my little sister Autumn Starr ~~\_\_\_\_\_~~ died in froster care.

(9) My happiest part in my are that I live with my grandparents and that I have three young and beautiful siblings. The other one is when we always go to camp ever year.

(10) When I get older I want to become an actress, fashion designer or a singer.

(11) The lawsuit my grandma is doing right now is very very important to me because my voice can be heard and that no child should have been hurt like me. Children are going to way more safe after this lawsuit. That is what think.

I am giving you this for the court case.

Arlene Lowery,  
witness

Charlene Dobson  
April 20, 2009

Supreme Court of Canada  
3601 Wallington Street  
Ottawa, Ontario  
K1A 0J1

Dear Registrar.

I am writing this on behalf of my grandmother and myself. I am asking to be a part of this appeal, due to all the struggles I had to face in my life and not getting any justice. When my grandmother received a letter regarding our loss I couldn't help but feel I needed to do something to get my life story out. I faced terrible experiences when I was younger that no child should ever have to go through. Ever since I was four years old I have been dealing with post-traumatic stress disorder (PTSD). I was abused severely, from being tied up with rope and burnt to watching and being forced to eat the remains of innocent infants. All my life I have been dealing with my depression and anxiety due to my abuse.

I came from a very abusive background, however people assume that I had made things up and that all of this was a lie, but everyone needs to look at this situation closely. A four year old girl explaining in great detail of the horrible things she had to go through and having the responsibility of caring for a younger brother. Instead of having a normal life, I was the parent for my younger brother. I was the one who changed him, fed him, and held him when he would cry. Now this might be hard to believe because I was only four years old. But it's true! My mother would leave me at home with Jonathan for hours. My mother was never there for me, and every time I would come back from visiting my grandparents I knew once they left I would be alone once again caring for myself and Jonathan. Finally in March of 1997 I was blessed when I was able to move into my grandparents home, however Jonathan wasn't able to. That had a very negative impact

knowing I wasn't there to protect my brother. I have extreme anxiety attacks, because I was so afraid for the well-being of my brother. Finally two-three days later Jonathan came to live with my grandparents and I. I was slightly relieved, but not enough to decrease my anxiety. I would scream, cry, and occasions faint. My grandmother had to deal with my anxiety for so long that we both were getting exhausted emotionally and physically.

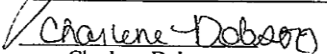
Over the years I received five younger siblings that were to come under the care of my grandparents, however, the two youngest infants passed away due to poor care and protection from the Regina Social Services. This is something no one should ever have to go through. I had to deal with my two younger sister's untimely death, knowing things didn't seem right with how they passed away. This has greatly affected me as well, with what I had watched with the sacrificing of infants, I couldn't help but get justice for the young children who have had their lives taken away from them.

I ask you to please take all of these documents in to consideration for the appeal. I have attached one other affidavit from April 20, 2009, and two letters from Dr. S. Damondharan, and Dr. P Matthew, as well as drawings from when I was younger. I chose these drawings to show you what I had seen when I was in the care of my mother and father. The first picture was when they would tie my cousins; brother and I up and burn us with knives, which we're placed on a hot burner. The second picture was when my mother, father, aunty, uncle, and Damondharan sacrificed the infants. Unfortunately I was put through all of this, however I know now I can help those children and young teens who have been through the same abuse as myself/



Sworn before me in Regina, Saskatchewan, Canada on the 5<sup>th</sup> day of November, 2010.

  
\_\_\_\_\_  
(A Commissioner for Oaths)

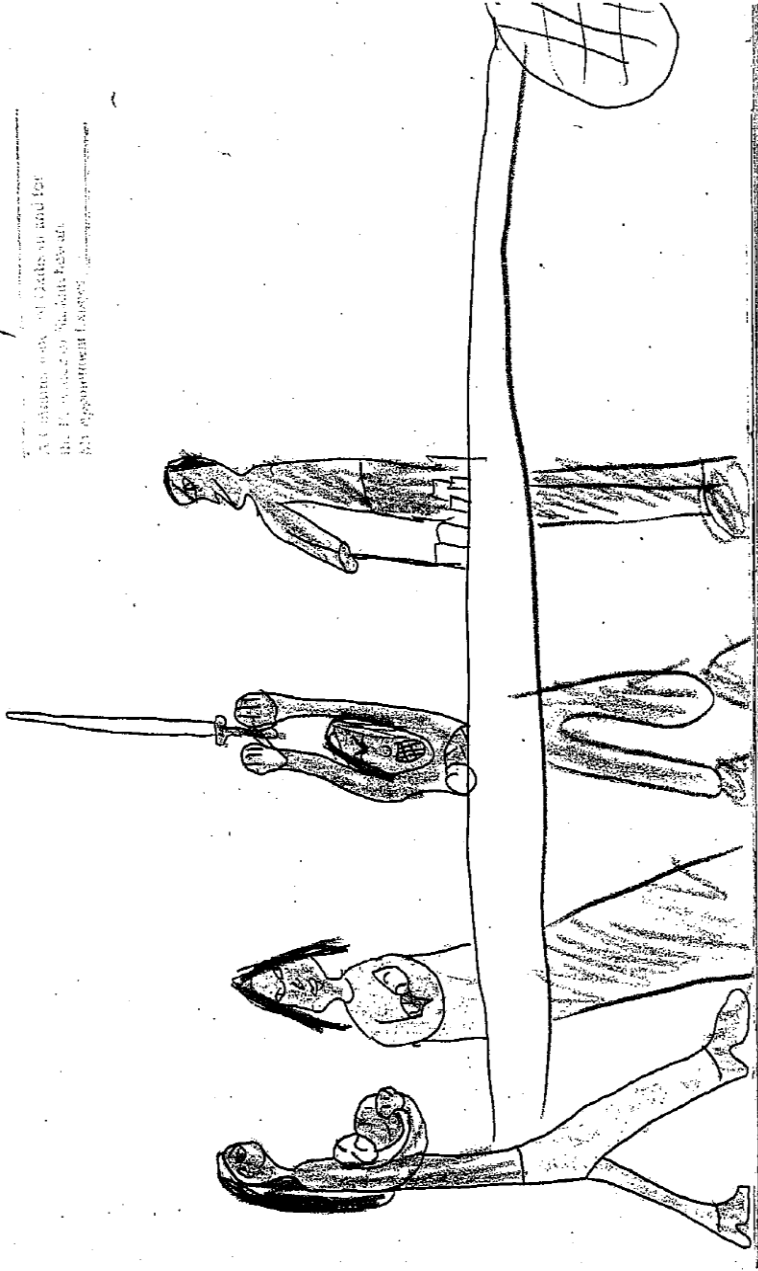
  
\_\_\_\_\_  
Charlene Dobson

A Commissioner for Oaths in and for  
Saskatchewan  
My commission expires July 31, 2014

A.

This is Exhibit ~~KE~~ referred to in the  
Affidavit of Arlene Lowery  
sworn before me this 27th day of  
FEBRUARY A.D. 2002.

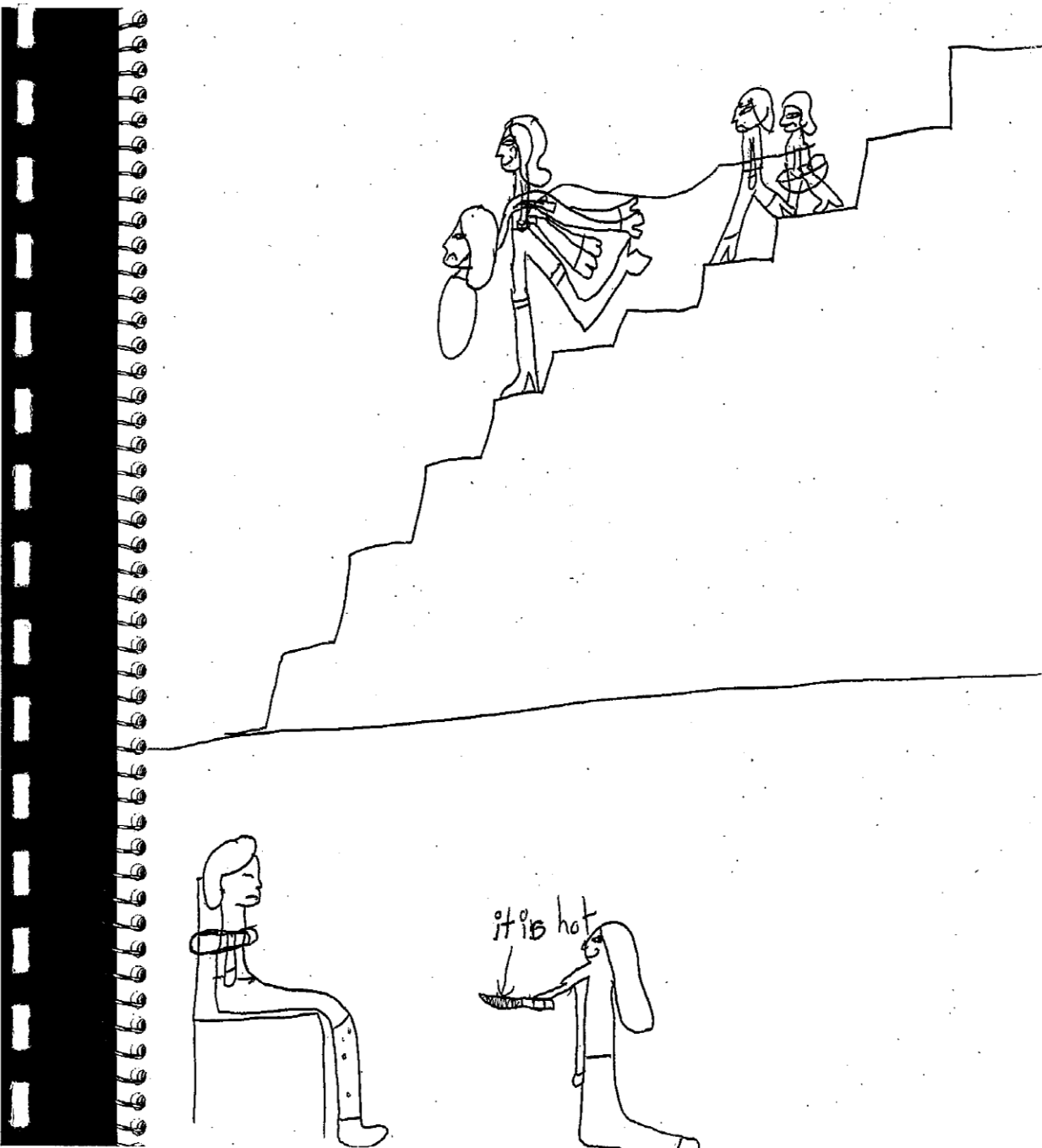
A Certified Copy of Exhibits is and for  
the Purpose of the said Affidavit  
has been deposited in my  
Official Record Book.



This is Exhibit K2 referred to in the  
Affidavit of Arden Warden  
sworn before me this 29th day of  
FEBRUARY A.D. 2006

EXHIBIT PART 2 23

A Commissioner of Oaths in and for  
the Province of Saskatchewan  
My Appointment Expires JAN 31 2011



This letter is attached to the Notice of Motion to Add Parties to Application File No. 33944 and all Respondents, including counsel for the Respondents (proposed).

**December 16, 2010**

**Supreme Court of Canada**

301 Wallington Street

Ottawa, Ontario

**KIA OJ1**

613-996-8666

1-888-551-1185

**Fax: 613-996-9138**

**From: Charlene Dobson, Applicant (proposed)**

203-1808 Smith Street

Regina, Saskatchewan

Tel: (306) 205-4160

**Fax: (306) 205-4161**

**Dear Registrar,**

I have been informed by my grandmother, Arlene Lowery, Applicant to the Application for Notice to take Leave to Appeal, that she needs to have ~~be~~<sup>me</sup> write a letter of consent that I agree with being added with her as an Applicant to this lawsuit (your File No. 33944).

Therefore, I request that I be added as an Applicant to this lawsuit with Arlene Lowery, and as a Joinder to it.

As per the Supreme Court of Canada Rule 18 (5), I deem that I have knowledge of certain matters pertaining to my own sexual and physical abuse and that of my brother Jonathan Dobson also.

For this Application I request that you add me to it as of adult age, since I will be 18 years old on January 25, 2011.

I also request that the sealed envelope in your possession since November 08, 2010, be opened and attached to this letter.

Should you require 5 more copies I will be pleased to provide those to you if this is necessary.

Thank-you, for your considering my request.

Yours truly,



Charlene Dobson

cc. Arlene Lowery  
and Respondents as per the Style of Cause.

## ***Rules of the Supreme Court of Canada***

### **PART 1 - APPLICATION AND INTERPRETATION**

#### **Application.**

#### **Adding and Substituting Parties.**

**18.** (1) A person may be added or substituted as a party on motion before a judge or the Registrar that sets out the reasons for the addition or substitution.

(2) Subject to subrule (5), no person shall be added or substituted as a party without the person's consent being filed with the Registrar.

(3) The motion referred to in subrule (1) shall also be served on the proposed added or substituted party.

(4) Parties added or substituted shall be served with all documents provided for in these Rules, and any time periods shall begin as provided for in the order unless a judge or the Registrar otherwise orders.

(5) In any proceeding, the Court or a judge may order that a party be added or substituted where, in the opinion of the Court or the judge, such addition or substitution is necessary to enable the Court to adjudicate the questions in issue.

CANADA

File Number: 33944 of A.D. 2010

IN THE SUPREME COURT OF CANADA  
ON APPEAL FROM THE SASKATCHEWAN COURT OF APPEAL

BETWEEN:

Arlene Lowery

APPLICANT  
Appellant (Plaintiff)

AND:

Saskatchewan Government

-and-

Dr. C. Norman, M.D.,

Dr. S. Leibel, M.D., Dr. L.P. Ruthnum, M.D.,

Dr. E. Ivanochko (Reg. Psychologist)

City of Regina Police Department,

Chief Cal Johnston, Corporal Debbie Ferguson

RESPONDENTS  
Respondents (Defendants)

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NOTICE OF MOTION TO ADD PARTIES TO THIS APPLICATION  
NAMELY, CHARLENE DOBSON, AS A JOINDER WITH THE APPLICANT; AND  
THE ATTORNEY GENERAL OF THE GOVERNMENT OF CANADA  
AND JOYCE LAPRISE AS RESPONDENTS  
*as per the Supreme Court of Canada, Rule 18: subrule (1) and (5)*

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*Arlene Lowery, Applicant/Appellant (Plaintiff)*

Regina, SK CAN.  
Telephone number: (306)  
Fax Number: (306)  
Email: [anchorinn@ymail.com](mailto:anchorinn@ymail.com)

Deputy Minister of Justice and  
Attorney General, Saskatchewan Government  
Saskatchewan Justice  
Civil Law Division  
9<sup>th</sup> Floor - 1874 Scarth Street,  
Regina, SK, Canada,  
S4P 4B3  
Telephone number: (306) 787-8953  
Fax Number: (306) 787-0581