

SUPREME COURT NOVA SCOTIA

BETWEEN:

HER MAJESTY THE QUEEN

and

GLEN ASSOUN

AFFIDAVIT OF ROGER ROBBINS

I, ROGER ROBBINS of the City of Halifax, in the Province of Nova Scotia, SWEAR
(OR AFFIRM) THAT:

1. I am a corporal in the RCMP in the "Violent Crime Linkage Analysis System" ("ViCLAS") Unit. I have been working in the ViCLAS Unit for 6 years and as such, have personal knowledge of the matters deposed to herein unless otherwise stated to be based on information and belief.
2. I was tasked with the review of particular documents pertaining to ViCLAS that I understand formed part of the appendices to the preliminary assessment report prepared in relation to Glen Assoun's application for ministerial review.
3. ViCLAS information is not typically disclosed, even to an accused in a criminal matter. ViCLAS is a national database for tracking violent offenders and the offences they commit. More specifically, ViCLAS is an automated case linkage system designed to assist police agencies in identifying links between cases based primarily on the behaviour exhibited by an offender. ViCLAS helps police forces to identify violent crimes that may be serial in nature. The underlying premise of ViCLAS is that serial offenders follow similar patterns and often exhibit identifiable and predictable characteristics and motivation.

4. When a serious crime occurs that qualifies as a ViCLAS reportable case, an investigator completes a ViCLAS questionnaire or "booklet." Once the booklet has been entered into the ViCLAS database, a ViCLAS specialist begins the analytical process. This involves conducting extensive background research on the victim and offender, if known. Once the ViCLAS specialist has conducted this research, he or she will conduct various structured queries on the ViCLAS database. These queries are intended to capture and compare relevant aspects of the case such as the offender, victim, modus operandi, behavioural and forensic data found at the scene for clues that may link cases to each other and/or reveal the identity of the offender.

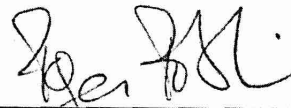
5. It is the RCMP's position that public disclosure of ViCLAS information, even disclosure of a blank booklet, would be injurious to this sensitive and extremely important investigative technique, as it would educate the criminal element about the types of behaviour we find particularly important.

SWORN (or AFFIRMED) before me at the
City of Dartmouth, in the Province of Nova
Scotia, this 7th day of June, 2019



A Commissioner of Oaths
For Nova Scotia

John M. Berger
A Commissioner of the
Supreme Court of Nova Scotia



ROGER ROBBINS