

Civil Rights In Public Education, Inc.

All human beings are born free and equal in dignity and rights
UNIVERSAL DECLARATION OF HUMAN RIGHTS



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We claim abuse of conscience because we are coerced to support the Roman Catholic church through the RC separate school systems.

What follows is a personal story by an individual who has been there, and who will enlighten us about the inner workings of the Roman Catholic church. Inner workings which do not merit our forced financial support.

Introduction

My name is Patricia Grell and I was raised in a strong and proud Catholic family. When I went to university I went to a Catholic university - St. Michael's College, University of Toronto - where I eventually graduated with a theology degree (Master of Divinity). I worked for 8 years in ministry - first in a parish and then a retreat centre before choosing to work at home raising 3 children. During my time at home, I became involved in my community and discerned that I wanted to serve the public as a Catholic school trustee for Edmonton Catholic School District. I was successful in my election and served in this capacity from 2013-2017.

School trustee

During my time as a Catholic school trustee I had a hard look behind the scenes of running a Catholic school district. It was not pretty. I saw how the Catholic district identified itself as an exclusive school system for the privileged. This was accomplished by turning away students with special needs and learning disabilities due to "lack of resources", the creation of high school programs requiring high academic standing for admission and by denying the rights of LGBTQ students e.g. denying the rights of transgender students to use the washroom they identified with and denying Gay Straight Alliance support groups within schools. In regards to

LGBTQ rights within Catholic schools, a priest who was sent by Edmonton Archbishop Richard Smith to assist the Board to create a Catholic policy to address the case of transgender students, told the Board: "Catholic schools are not the place for transgender students". More recently, racism as well has plagued the Catholic system due to ill informed leadership (cf. Racist incident at Christ the King School in Edmonton)

For the privileged

These are only a few of the many ways Catholic schools have become a place for the entitled and the privileged ~ not a place for students from a variety of socio economic backgrounds, cultures, and religious affiliations within our community to learn together and learn how to live together. And then of course there is the issue of clergy sexual abuse.

Not only in schools

Catholic clergy are permitted to enter the 100% publicly funded Catholic schools, hospitals and social agencies established in many

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of Canada's provinces. A number of scholars state that clergy sexual abuse and its cover-up by church leaders will continue until clericalism is addressed, until substantial changes are made in the way the church forms its priests and until the church updates its understanding of human sexuality. In the words of Rob Talach -- a lawyer who has advocated for victims of sexual abuse for 18 years here in Canada - "Priests are still allegedly celibate, male, and empowered with incredible temporal and spiritual authority over obedient parishioners. All the ingredients that led to the abuse of many of my clients over decades ago, still are alive and well in the contemporary Catholic church."

Spotlight

We are well aware of the Hollywood movie Spotlight which won the Academy Award for Best Picture in 2016. This movie was based upon the 2002 true story of the Boston Globe's expose on clergy sexual abuse and its cover up by the highest levels of church authority. Spotlight reveals a church in damage control, a church using every method possible to cover up clergy sexual abuse and silence its victims.

Around the globe

Canadians have been witnessing governments around the globe conducting large-scale investigations into the archives of the Roman Catholic church in their respective countries. These proactive police investigations are regrettably, but very predictably, discovering thousands of cases of Roman Catholic clergy and religious who have victimized innocent children and vulnerable adults.

In Canada too

But what about Canada? How is the Canadian Catholic church be-

ing held accountable for its decades of sexual abuse cover-ups? Why are archbishops, bishops and other Catholic church leaders in Canada not being formally questioned and charged for their direct role in aiding and abetting the horror of child abuse? If a victim comes forward to church leaders and their silence is bought, is the offending clergy still in ministry in Canada's 100% publicly funded Catholic schools, hospitals, social agencies and tax exempt churches?

Catholic bishops

The Canadian Conference of Catholic Bishops (CCCCB) revised their guidelines to address clergy sexual abuse in Canada in 2018. However, the updating of these guidelines was merely public relations 'window dressing' to quell growing public outrage on this issue. In fact, nothing substantial changed in the way this institution has traditionally conducted itself with criminal impunity in Canadian communities.

Unfettered access

Shockingly, despite the Catholic Church's lead role in the horrific abuse of residential school children, this tax-exempt institution still has unfettered access to Canadian children and vulnerable adults through their institutions. (Moreover, this tax-exempt institution has still not paid agreed-upon reparations to residential school victims.) In fact, the Catholic Church in Canada continues to operate no differently than when it published its first response to the 1980s sex abuse scandals *From Pain to Hope* in 1992.

Male hierarchy

The Catholic church has an issue with power concentrated in its exclusive hierarchy of male lead-

ers. Nothing will change until this structure is fundamentally changed to include women, married people, and clerics who are both LGBTQ and straight. But this needed change to cleanse the Catholic Church is not likely to happen in a closed, unaccountable organization which continues to receive public funding, tax-free status, and global donations despite the continued, reprehensible conduct of its male leaders who cling to power.

Consider the case of Michael Bland.

Bland was sexually abused by Fr. John Huels in the 1970s and notified Huels' Servite order of this abuse in 1994. Huels was then sent to Africa and returned to Canada to take a position as professor of Canon Law at St. Paul's University, Ottawa, 1997.

Bland, seeing that Fr. Huels was again ministering in Canada and a public safety risk, approached the church again. The Church responded by making Huels take a leave of absence from his teaching post in 2002. Archbishop Marcel Gervais of Ottawa however, allowed Huels to return to teaching at St. Paul's because Huels agreed to stop presenting himself or act as a priest.

Huels therefore continued to teach at St. Paul's up until Bland contacted Ottawa Archbishop Prendergast on Sept. 18, 2018. Four days later, Huels was removed from his teaching post.

According to the Catholic Register, "a spokesperson for Saint Paul University...could not answer questions about how Huels was allowed to continue teaching after his history as an abuser was known in 2002."

This is one of many examples of how Catholic clergy abusers continue to avoid the accountability of our justice system — and even continue to present themselves as moral authorities — even after CCCB's *From Pain to Hope* guidelines were created in 1992. This zeal to protect the church at all costs and avoid the reputational and punitive damages of Canada's justice system — is why clerical criminality continues unabated despite the slightly updated edition of church abuse guidelines.

CBC podcast

In an interview with Evelyn Korkmaz, who attended St. Anne's residential school in Fort Albany, Ont., she states in the CBC podcast *Now or Never*,

"What I really want is for the archives to open. To show how widespread this abuse is all over the world. And for these people to be removed so they will not abuse again."

The UN's Special Rapporteur on Religion or belief.

The text below is copied from the website of the United Nations.

<https://www.ohchr.org/EN/Issues/FreedomReligion/Pages/FreedomReligionIndex.aspx>

The *Special Rapporteur on freedom of religion or belief* is an independent expert appointed by the UN Human Rights Council. The mandate holder has been invited to identify existing and emerging obstacles to the enjoyment of the right to freedom of religion or belief and present recommendations on ways and means to overcome such obstacles.

Historical Background

The United Nations Commission on Human Rights appointed further to resolution 1986/20 a "Special Rapporteur on religious intolerance". In 2000, the Commission on Human Rights decided to change the mandate title to "Special Rapporteur on freedom of religion or belief", which was subsequently endorsed by ECOSOC decision 2000/261 and welcomed by General Assembly resolution 55/97. On 21 March 2018, the Human Rights Council adopted resolution 40/10, which, inter alia, extended the mandate of the Special Rapporteur for a further period of three years.

Mandate

The Special Rapporteur has been mandated through Human Rights Council resolution 6/37 (see full text in English, French, Spanish, Chinese, Arabic and Russian):

- to promote the adoption of measures at the national, regional and international levels to ensure the promotion and protection of the right to freedom of religion or belief;
- to identify existing and emerging obstacles to the enjoyment of the right to freedom of religion or belief and present recommendations on ways and means to overcome such obstacles;
- to continue her/his efforts to examine incidents and governmental actions that are incompatible with the provisions of the Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief and to recommend remedial measures as appropriate;
- to continue to apply a gender perspective, inter alia, through the identification of gender-specific abuses, in the reporting process, including in information collection and in recommendations.

Working Methods

In the discharge of the mandate, the Special Rapporteur:

- a) transmits communications to States with regard to cases that represent infringements of or impediments to the exercise of the right to freedom of religion and belief.
- b) undertakes fact-finding country visits.
- c) submits annual reports to the Human Rights Council, and General Assembly, on the activities, trends and methods of work.

Current Mandate-holder

On 1 November 2016, Ahmed Shaheed assumed his mandate as Special Rapporteur on freedom of religion or belief. He is Deputy Director of the Essex Human Rights Centre. He was the first Special Rapporteur of the Human Rights Council on the situation of human rights in the Islamic Republic of Iran since the termination of the previous Commission on Human Rights mandate in 2002. A career diplomat, he has twice held the office of Minister of Foreign Affairs of Maldives. He led Maldives' efforts to embrace international human rights standards between 2003 and 2011.

CRIFE, along with a number of supporters, has submitted a concern to the Special Rapporteur which outlines the situation in Ontario, Alberta & Saskatchewan with regard to publicly-funded RC school systems.

UN Report blasts religions' overreach, and the Holy See is not amused.

By Jamie Manson of the National Catholic Reporter March 10, 2020.
[The National Catholic Reporter is a publication which is independent of the Roman Catholic church.]

<https://www.ncronline.org/news/opinion/grace-margins/un-report-blasts-religions-overreach-and-holy-see-not-amused>

A U.N. report was released that suggests that religion may be a greater threat to women's health and existence than any virus.

The report from the U.N.'s special rapporteur on freedom of religion or belief examines the way in which religious groups influence laws and state-sanctioned practices that violate the rights of women, girls and LGBTQ persons.

"I firmly reject any claim that religious beliefs can be invoked as a legitimate 'justification' for violence or discrimination against women, girls or LGBT+ people. The right to freedom of religion protects individuals and not religions as such," Ahmed Shaheed, special rapporteur on freedom of religion or belief, said in a press release.

LGBT+ people

"Women and LGBT+ people experience discrimination and violence inflicted in the name of religion by State and non-State actors that impedes their ability to fully enjoy their human rights," Shaheed added.

He also expressed concern about the rise of religious and political campaigns that invoke religious freedom in an attempt to roll back human rights.

There is an "increasing use of religion or belief to deny reproductive health and sexual rights; criminalize protected conduct and deny the equal personhood of LGBT+ persons; or to undermine the right to freedom of religion or belief to women, girls and LGBT+ persons," the report states.

It's the Vatican

Though the report does not name any religious institutions in particular, there is little doubt that the rapporteur and his committee had the Vatican in mind as they wrote this analysis.

The Vatican not only exerts influence in countries around the world, it is also the only religious institution that wields its power within the U.N. itself.

Operating under the name the Permanent Observer Mission of the Holy See to the United Nations, the Vatican is the only religious body in the world that enjoys the privileges of a country at the U.N. Though it does not have full status as a member state, in 1964 it was granted permanent observer status, with fully staffed missions in both New York and Geneva.

The Holy See assumes this right by asserting that the Vatican City-State is a proper country —

even though it has a population of 800 and no permanent citizens — and because it claims to have global moral authority.

Formidable influence

Though it does not get a vote at the U.N., the Holy See's position affords it formidable influence in conferences and meetings, the development of treaties, and negotiations of resolutions and agreements.

The Holy See remained a relatively innocuous presence at the U.N. during its first three decades. But things began to shift in 1994 at the Cairo International Conference on Population and Development and in 1995 at the Beijing Fourth World Conference on Women (which was supposed to celebrate its 25th anniversary at the Commission on the Status of Women gathering this year).

Initiates tactics

In Cairo, the Holy See initiated a tactic that has now become commonplace during member states' negotiations: dissenting from the use of certain language — usually having to do with sex or gender — in documents or goals. It managed to hold up consensus on the Beijing Platform for Action on the rights to reproductive health by insisting that it could not assent to any

language that gave the impression that sex and reproduction could happen outside the bonds of marriage.

No family planning

It also objected to phrases that advocated for artificial contraception or used the phrase "unwanted pregnancy." It did all of this, of course, in the name of halting the availability of modern contraceptives and abortion services to developing nations — family planning resources that could have significantly curbed the spread of poverty, hunger, illness and even death.

Similarly, in Beijing, the Holy See unleashed a hostile takeover of the discussion of the word "gender," forcing the president of the conference to add an addendum stating that the word must only refer to the two sexes, male and female, and that no new meanings could be used. This continues to influence policy negotiations at the U.N. to this day.

Objects to wording

It also objected to use of the phrase "intimate partner violence," in resolutions about protecting women from all forms of assault, claiming that by agreeing to such language, the church would be seen as condoning sexual relations outside of marriage.

The Holy See also instituted one of its most powerful tactics in Cairo and Beijing: forging alliances with small countries where they already have undue political influence (like Honduras, Guatemala and Malta) and hardline Islamic nations (like Libya and Iran) to undermine the international consensus on women's

right to reproductive health, including access to family planning.

These unholy alliances have grown over time, and today one of the Holy See's strongest allies at the U.N. is Russia, a country whose president has banned so called "gay propaganda" and is proposing a constitutional amendment that would define marriage as between one man and one woman.

Slammed the report

Given this history, it is little wonder that the Holy See slammed the special rapporteur's report on the freedom of religion and belief last week. Archbishop Ivan Jurkovic, the Holy See permanent observer to the U.N. in Geneva, lamented:

Particularly unacceptable and offensive are the numerous references that recommend that freedom of religion or belief and conscientious objection must be surrendered for the promotion of other so-called "human rights," which certainly do not enjoy consensus, thus being a sort of "ideological colonization" on the part of some states and international institutions.

The archbishop brands any rights that protect women and LGBTQ persons as "new human rights," and claims that these rights do not enjoy consensus among U.N. member states.

But his claim distorts the reality of consensus. Most member states support protecting the rights of women, particularly their rights to reproductive health care, and LGBTQ per-

sons. But those who are opposed are all members of the Holy See's unholy alliance, particularly Russia and radical Islamic nations like Saudi Arabia and Egypt.

Demands repeal

The archbishop uses the trope "ideological colonization" — a favorite of members of the hierarchy, including Pope Francis — to describe the report's demand that states repeal gender-based discrimination laws, particularly those enacted with reference to religious considerations. But again Jurkovic twists the truth.

The reality is that the Holy See and other religious institutions are using their ideologies to control and dominate the bodies and lives of women and LGBTQ persons worldwide. In some cases, these vulnerable people are being subjected to the beliefs of religious groups to which they do not even belong.

Support for Trump

This is certainly the case in the United States, where the Trump administration has given vigorous support to the U.S. bishops' campaign to use religious liberty claims as justification for denying women and LGBTQ persons fundamental rights to health, safety and protection from harm.

The rapporteur's report is the boldest attempt we have seen so far to curb the overreach of religious groups in civil law. The question is, will states finally find the courage to stop giving in to them?

Judge grants sex abuse survivor's bid to re-open settlement in civil case against Catholic church

CBC News · Posted: Dec 06, 2018 <https://www.cbc.ca/news/canada/london/deschenes-judge-1.4934930>

In a rare legal decision, a judge has set aside an 18-year-old settlement in a civil lawsuit that child sexual abuse survivor Irene Deschenes signed with the Diocese of London, saying the church failed to disclose key information about previous sexual assault allegations that would have drastically changed the terms of the settlement.

"I think justice has been served," said Deschenes, 57, at a news conference announcing the decision Thursday. "This might be the first step in a longer road to go down. But it feels good to be successful in my bid to re-open my civil suit."

Deschenes was abused by Father Charles Sylvestre between 1970 and 1973 while she was a young girl and a student at St. Ursula Catholic School and parishioner of the parish in Chatham, Ont.

Sylvestre pleaded guilty in August 2006 to sexual assaults of 47 victims, all girls under the age of 18. The abuse happened between 1952 and 1986. Sylvestre died in prison in 2007.

Deschenes started a legal action against the diocese in 1996. At the time, the church argued it had no direct knowledge that Sylvestre was a sexual predator of children, saying the church only became aware of his actions in 1989.

Based on this information, Deschenes settled with the diocese in 2000 for \$100,000.

Then in December 2006, it came to light that in 1962 police in Sarnia, Ont., had taken reports from three 11-year-old girls in the company of their parents. The girls alleged Syl-

vestre sexually assaulted them. Police took no action but gave copies of the witness statements to the local church, which is part of the London diocese.

The statements were forwarded to a bishop who died a year later. According to information included in Justice David Aston's decision, the police interview summaries were discovered by Bishop Fabbro's executive assistant in December 2000, just months after Sylvestre was sentenced. They had "been misfiled with old accounting in records." The reports were then sent to all lawyers representing Sylvester's victims.

In his six-page decision, Justice Aston said the church's failure to disclose those police reports "was a material misrepresentation and it was relied upon by the plaintiff in her decision to settle as she did."

"The plaintiff would not have settled as she did in the fall of 2000 if they had known about the 1962 police reports," the judge's statement says.

Justice Aston also wrote that setting aside a settlement isn't a decision the court takes lightly and only happens when "there is a compelling reason."

At a news conference on Thursday, Deschenes said that by mishandling the police reports, the Catholic church failed to protect her and other children from Sylvestre.

"If the church had done what they were legally bound to do, Sylvestre would have been stopped from

creating more victims," she said.

Deschenes said the church has repeatedly failed to put the rights of victims first when faced with charges of sexual abuse.

"It's never about the victims," she said. "Or about how they feel, what happened to them or what's needed to help them heal."

Deschenes's lawyer Loretta Merritt said the diocese now has 15 days to file an appeal of Justice Aston's decision to set aside the 2000 settlement.

If the diocese doesn't appeal, Deschenes intends to start a new civil action to pursue new damages.

The diocese may offer a settlement. If that doesn't happen, Merritt estimates a new trial could take between two and four years to reach a conclusion.

Contacted by CBC News Thursday, London Archdiocese spokesperson Nelson Couto would not say how the church plans to respond to the judge's decision.

"We don't comment on a case that's active before the courts," he said.

CBC News · Posted: May 21, 2020

An Ontario appeals court has dismissed a bid by the Diocese of London to fight a lower court's decision to throw out a settlement involving a victim of child sexual abuse. They awarded \$60,000 toward Deschenes' legal costs and have opened the door to new civil action to pursue new damages.

Historical Double Dealings in Alberta

A century-old deal that was not honoured

The Northwest Territories was first created in June of 1870 when the Hudson's Bay Company ceded Rupert's land to the government of Canada.

For schools, the North West Territories Act of 1875 replaced the term "denominational", used in the British North America Act, with the term "separate" with the word never being defined.

The province of Alberta was formed in 1905. In designated school districts, the majority religion established "public" schools and the minority, for schools of its own, established "separate" schools.

"A policy of restricting state support to one secular university was early adopted, but in the schools, Alberta has been slowly drifting on a placid stream of public apathy towards the complete segregation of its Catholic citizens."¹

Thus, the secondary school system of Alberta was developed without any special legislation and with a growing tendency to segregation of Roman Catholic students.

However, in any school, religious instruction was to be limited to the last half-hour of the school day, and from this, any children of other religious persuasions may be excused. This restriction was in legislation (below) and discussed in Parliament (at right). But somehow, the half hour of religious instruction disappeared, and Roman Catholic separate school systems survive in Alberta.

Blame the politicians?

House of Commons Hansard from 1905 puts any argument to rest. Here's Prime Minister Wilfred Laurier et al discussing Section 17 prior to Confederation.

"Now, what are the characteristics of this school system? ... We have one normal school with uniform normal training for all teachers ... of all schools, separate and public; uniform curricula and courses of study for all schools of the same grade; uniform text books for all schools; uniform qualification of teachers for all schools; complete and absolute control of all schools as to their government and conduct, by the central school authority set up by the legislature under the ordinances; complete secularization of all schools between 9 o'clock in the morning and 3:30 in the afternoon, except that any school, if the trustees so desire, may be opened with the Lord's prayer; ... Then, where there is a public school, the minority, Protestant or Roman Catholic, may organize a separate school; but every separate school is subject absolutely to all the foregoing provisions, and is in every sense of the term a public school."

"This section preserves the right of the Protestant or Roman Catholic minority to have their school, a separate school in name, but a public school in fact, in a separate building if they wish. That is the right it preserves. It preserves, secondly, the right of the Protestant or Roman Catholic minority in such school to have religious teaching from 3.30 to 4 o'clock in the afternoon." - Clifford Sifton, Min. of the Interior.

"What is the character of the religious instruction they may have? That is a question altogether for themselves to decide ... [W]e can at all events agree that it is not a bad thing in itself that opportunity should be given for religious instruction at a certain hour, if the parents so desire it. This is now the law of the Northwest Territories, it has been the law for nearly fourteen years, or more; I venture to think it has been the law since 1885, and this is the law which it is now sought to perpetuate by this amendment." - Prime Minister Wilfred Laurier

"From the hour at which these schools open in the morning up to half-past three in the afternoon they are absolutely alike; there is no difference; ... So it has come to this, that we have a shade of difference as respects the half hour of religious instruction, from 3:30 to 4 o'clock ... I am persuaded that the difference is so small that the mass of the people in the Northwest Territories will hardly find it to their advantage to keep it up except in a few instances." - William Stevens Fielding (Minister of Finance)

Sources of information for this page include: David King and Luke Fevin of Alberta, the book "Church and State in Canadian Education"¹ by C.B. Sissons, and Wikipedia

Section 17 of Alberta Act

https://www.solon.org/Constitutions/Canada/English/aa_1905.html

"17. Section 93 of the Constitution Act. 1867 shall apply to the said province, with the substitution for paragraph (1) of the said section 93, of the following paragraph:-

"(1) Nothing in any such law shall prejudicially affect any right or privilege with respect to separate schools which any class of persons have at the date of the passing of this Act, under the terms of chapters 29 and 30 of the Ordinances of the North-west Territories, passed in the year 1901, or with respect to religious instruction in any public or separate school as provided for in the said ordinances."

Ch 29 NWT School Ord, Sec 137—139

<http://www.qp.gov.sk.ca/documents/english/statutes/historical/ONWT-1901-CH-29.pdf>

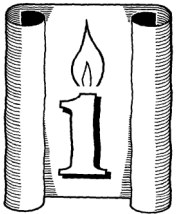
Religious Instruction (137) No religious instruction except as hereinafter provided shall be permitted in the school of any district from the opening of such school until one half hour previous to its closing in the afternoon after which time any such instruction permitted or desired by the board may be given. Time for the Lord's prayer (2) It shall however be permissible for the board of any district to direct that the school be opened by the recitation of the Lord's prayer. C.O., c.75, s.110. Attendance not compulsory during religious exercise (138) Any child shall have the privilege of leaving the school room at the time at which religious instruction is commenced as provided for in the next preceding section or on remaining without taking part in any religious instruction that may be given if the parents or guardians do desire. C.O., c.75, s.111. No pupil to be deprived of ordinary education (139) No teacher, school trustee or inspector shall in any way attempt to deprive such child of any advantage that it might derive from the ordinary education given in such school and any such action on the part of any school trustee, inspector or teacher shall be held to be a disqualification for and voidance of the office held by him.

WHO WE ARE

Civil Rights in Public Education, Inc. is the current name for this organization which began in 1986. It is composed of citizens living in more than 155 communities across Ontario who are committed to one strong public education system which offers neither privilege nor prejudice to anyone.

OUR AIMS ARE

- To serve as advocates for civil rights in public education so that the public is informed about the issue of publicly-funded separate schools.
- To hasten the day when Ontario institutes the principled decisions by Manitoba, Quebec, Newfoundland & Labrador to remove public funding for religious schools.



OUR LOGO

Our logo is composed of a background scroll representing the charters of rights which guarantee fundamental freedoms to all individuals; the numeral "1" signifies equality and social unity in one public education system for each official language; the flame above is the universal symbol for freedom.

Update on OPEN's legal case.

Perfection, and accuracy require time, or even getting close to perfection, but when it comes to a critical court case, and especially when one has only one kick at the can, being as close to absolute accuracy as possible is especially critical. So it is with **One Public Education Now**.

Despite diligent attention to every detail on the path forward, OPEN has been frustrated by other parties in the process, and this has led to another delay. The team of five have all agreed that a delay to find the most promising next step is necessary. We must all wait some more.

On the radio this morning (Saturday, June 27, 2020) there was an interview with the professor of Classics at the University of Calgary, Peter Toohey, author of "Hold On: The Life, Science and Art of Waiting". He tells us about the importance of waiting. Listen to his interview at: <https://www.cbc.ca/listen/live-radio/1-98-in-town-and-out/clip/15784604-hold-on>

The dictionary tells us that: "waiting" is a noun, defined as: "the act of waiting (remaining inactive in one place while expecting something); "the wait was an ordeal for him".

Or, as one author used the term: "Try as I might to repel it, there was one foreboding thought that pressed closer and closer on my mind as the interval of **waiting** wore its weary way on."

A Thought to Consider

There is no greater fraud,
than a promise not kept.

Gaelic proverb, (re: "Historical Double Dealings" p. 7)

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ABOVE ALL WE MUST MAKE SURE THAT NO CITIZEN OF ONTARIO, NOW, OR EVER IN THE FUTURE, IS PRIVILEGED OR DISADVANTAGED PUBLICLY BECAUSE OF HIS/HER RELIGIOUS FAITH, OR ABSENCE OF RELIGIOUS FAITH.