

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

AFFIDAVIT OF JEFFREY LIMA COUTO

I, Jeffrey Lima Couto, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a 43 year old male.
3. I have three children. Their ages are 17, 14, and 13. They live in Kitchener with their mom, my ex-wife.
4. I went to school until grade 12.

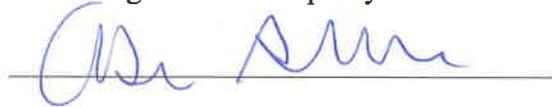
5. I receive Ontario Works of approximately \$700 per month.
6. My father was murdered when I was 20 years old and my brother was 10 years old. I very quickly became a father figure for my younger brother.
7. I was self-employed for 23 years, working in renovations and roofing. I owned a successful small business with ¹⁵ ~~five~~ employees and five trucks.
8. I stopped working in 2021 when I had to shut down my business due to the pandemic and increased mental health challenges. My business was struggling because no one was letting anyone in their house to do renovations or repairs.
9. COVID was really hard on me. I had never used drugs before 2021 and became addicted to cocaine at that time. I got a DUI and could no longer drive my vehicle, which I needed to do for work. I was experiencing a separation from my ex-wife and significant mental illness. My world was falling apart. Before that time I had a career and owned my own home.
10. For a period of time after my separation I was staying at a rooming house, but I couldn't pay my rent there anymore. I first came to the 100 Victoria Street Encampment (the "Encampment") in and around 2021. I also lived here for six months in 2024. After this point I got sober and went to stay with my mom, but have since relapsed. I have been at the Encampment consistently since April 2025.

11. I have been through the detox program at Park Street in Kitchener twice, once in 2024 and once in 2025. Both times I went through the entire rehab program of approximately 18 days.
12. I started using fentanyl this year. I have to use it daily or I will get really sick. I am not on any programs for methadone or dilaudid, but I want to get on those programs so I can stop using fentanyl.
13. At periods of time I will go back to my mom's house. But for three weeks I haven't seen anyone in my family, including my children, because I was beat up recently and my face is destroyed and I don't want them to see me like that. I did see my family on Thanksgiving weekend.
14. The Encampment provides somewhere to go if there are no other options, but I don't want to be here. There are so many rats and it is difficult not to have running water or electricity.
15. I have experienced frost bite in my feet while I've been homeless. I have also had no access to my heart medication in over two years.
16. For periods of time since becoming homeless I have slept on the streets. I have slept at City Hall, Victoria Park, under trees, in bathroom stalls, and at a Tim Hortons before.
17. I have been robbed and assaulted while living on the streets. I was sexually assaulted as a child.
18. I don't have any belongings anymore.

19. The Region's unsheltered workers have never offered me a motel. I would like to be offered permanent housing. I think I am on a waiting list for housing.

20. If the 100 Victoria Encampment were not available to me I would probably be sleeping in a park.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 15 day of)
October, 2025)
In the Regional Municipality of Waterloo)



ASHLEY SCHUITEMA,
a Commissioner, etc.,
Province of Ontario,
while a Barrister and Solicitor.
LSO #68257G



Jeffrey Lima Couto