

**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 TERRANCE JOSEPH PATRICK COLE**

I, Terrance Joseph Patrick Cole, 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 57 year old male.
3. I had five children, three biological and two step-children. I lost two of my children to mental health struggles and addiction.
4. I am in a relationship with Kari Kuntz.

5. I went to school until grade 12.
6. I worked at Canada Tool Company in Cambridge for 36 years as a maintenance operator, tool & die maker, and millwright.
7. I was abused by close family members and community members as a child. I was sexually abused by a priest as a child in Newfoundland. Because of this I was severely physically and emotionally abused by my father throughout my childhood for being 'queer'. I remember having to eat Christmas dinner in the barn and being whipped with a belt by my father.
8. I suffer from poor mental health and have suicidal ideations. I can become violent and snap because of my mental health conditions.
9. I stopped working about two and a half years ago because of my mental illness, which made it difficult to concentrate and made me clumsy at work.
10. I was receiving Long Term Disability (LTD) benefits but they were recently cut off. I was told I needed to apply for Canada Pension Plan Disability or my LTD benefits would be cut off. I struggled to complete the paper work on time and my LTD benefits have now stopped.
11. I started using cocaine and fentanyl after losing my children. When my step-son died, my wife and I split up.

12. I am trying to get away from drugs and use addiction support programming for counselling and access to suboxone. I use the Rapid Access Addiction Medicine Clinic (RAAM) in Kitchener.

13. I still use fentanyl but in small doses and I'm trying not to. When I use fentanyl I will use with Kari around, she keeps track of when I used and how much so I can stay safe.

14. I have slept in parks and under trees. I have lost all of my belongings while I've been homeless.

15. I have been living at the 100 Victoria Encampment on and off for one and a half years.

16. I stayed at the Bridges shelter in Cambridge about four years ago. I only stayed for a month because I found it too crowded, found it difficult to be around others using drugs, saw too much violence, and had trouble sleeping.

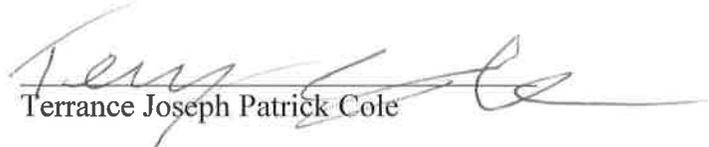
17. I couch surfed at my cousin's apartment for a few months in Cambridge. <sup>His father, my cousin,</sup> ~~My uncle~~ lived in the same building and my cousin wanted to move in to <sup>his father's</sup> ~~my uncle's~~ unit to take care of <sup>him</sup> ~~his father~~. I had to move out then.

18. For approximately 4-5 months I lived in my vehicle. At one point I was pulled over and asleep with the keys in the ignition and I was charged with impaired driving. My vehicle was since stolen and I continue to have a car loan for it that I cannot pay back.

19. For a period of time I lived at Kari's mom's house, but Kari and her mom butt heads and Kari was asked to leave. I left at that time and moved into a tent at the encampment.
20. The encampment at 100 Victoria is located close to services I access for food and treatment. I go across the street for coffee and to the soup kitchen. I also access the hospital, the probation office and the RAAM clinic, which are all nearby.
21. I rely on the donations and harm reduction supplies brought to the 100 Victoria encampment.
22. I do not feel particularly safe at the encampment, even with the security provided, but I have no other options or anywhere else to go. The security would watch you die and not help you. I have been assaulted with bear mace and beaten with a bat and the security has not intervened. My arm is broken in two spots and is not healing properly.
23. My income makes it impossible for me to find affordable housing. You need at least first and last month's rent to get an apartment and I cannot afford it.
24. I have spoken to the Region's unsheltered workers but have been told there is nothing available for me. I believe I am on a waitlist for subsidized housing.
25. I need a shelter option that is available to couples so I can continue to live with Kari.
26. I would stay at a motel if it was offered to me.

27. If 100 Victoria were not available to me I would probably live in a stairwell.

AFFIRMED BEFORE ME in the )  
City of Kitchener, this 10<sup>th</sup> day of )  
October, 2025 )  
In the Regional Municipality of Waterloo )



Terrance Joseph Patrick Cole

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