

Court File No. CV-25-00000750-0000

**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

2nd AFFIDAVIT OF AARON EL SABROUT

I, Aaron El Sabrout, of the City of Kitchener, in the Region of Waterloo, 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 previously affirmed an affidavit dated July 7, 2025. I adopt and rely upon that affidavit and update certain matters below.
3. I attend the Encampment as an independent community volunteer to provide peer support to the residents and to provide mutual aid resources.

4. As an update to my July 7, 2025 affidavit, in and around December 2025, I went from attending 3-4 times per week, to attending 2-3 times per week.

5. In the two weeks leading up to affirming this affidavit, I attended the Encampment on the following dates:

- Tuesday, March 24, 2026
- Wednesday, March 25, 2026
- Thursday, March 26, 2026
- Friday, March 27, 2026
- Tuesday, March 31, 2026
- Thursday, April 2, 2026
- Saturday, April 4, 2026
- Tuesday, April 7, 2026

6. On Tuesdays I would arrive around 12:00 pm, and on Thursdays I would arrive around 10:00 am, and on the other dates my timing would vary. I would attend for a few hours on each visit.

7. On each occasion I observed approximately 15-20 people who appeared to have slept at the Encampment overnight. I arrived at this number through a combination of methods – on the mornings, it was early enough that many people were still sleeping/inside their residences, I walked around and knocked to offer people smokes/food and counted the folks that were visible to me if someone opened the door (this would be an undercount for the larger structures). I also spoke to people and asked, "are you staying here right now" after seeing them on site. I also kept track, even if someone didn't greet me in the morning when I knocked, of folks who clearly were sleeping and getting up for the first time that day when they emerged to go across the street to St. Johns to wash up (typical first thing in the morning behavior).

8. I have also spoken to another volunteer, Sky Dasey, who was attending the Encampment on alternating days to me over the past two weeks. Sky has advised and I believe it to be true, that it is also her estimate that approximately 15-20 people are staying overnight.

9. In the past week, I observed 4 new tents being set up at the Encampment. In my estimate there are about 12 structures currently being used on site.

10. During the daytime in addition to the 15-20 people noted above, I also regularly observed about 10-15 more people each day visit the Encampment. I would observe people going to visit residents, pick up donations, or hang out in the space. I understand that some of these people rely on the Encampment as a place to shelter during the day as they sleep at the winter warming centre across the street at night.

11. I understand from reading posters in downtown Kitchener that the overnight warming centre across the street at St. John's will close on April 12, 2026. In my experience the numbers at the encampment will grow once winter warming spaces close.

AFFIRMED remotely by Aaron El Sabrout)
 at the City of Kitchener, in the Province)
 of Ontario, before me at the City of Kitchener)
 in the Province of Ontario on April 8, 2026 in)
 accordance with O. Reg. 431/20.)



Ashley Schuitema, A Commissioner of
 Oaths (LSO # 68257G)



AARON EL SABROUT

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Proceeding commenced at KITCHENER

2ND AFFIDAVIT OF AARON EL SABROUT

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