

CANADA

**SUPERIOR COURT
(Civil Division)**

**PROVINCE OF QUEBEC
DISTRICT OF MONTREAL**

No.: 500-17-120468-221

KAHENTINETHA

KARENNATHA

KARAKWINE

KWETIIO

OTSITSATAKEN

and

KARONHIATE

Plaintiffs

v.

**SOCIÉTÉ QUÉBÉCOISE DES
INFRASTRUCTURES**

ROYAL VICTORIA HOSPITAL

MCGILL UNIVERSITY HEALTH CENTRE,

MCGILL UNIVERSITY,

VILLE DE MONTRÉAL,

and

ATTORNEY GENERAL OF CANADA,

Defendants

and

ATTORNEY GENERAL OF QUÉBEC

Impleaded

Party

**AFFIDAVIT OF LANA PONTING IN SUPPORT OF THE PLAINTIFF'S APPLICATION
FOR AN INTERLOCUTORY INJUNCTION**

I the undersigned, Lana Ponting, residing at _____, solemnly affirm the following:

1. I am a witness in the plaintiffs' application for an interlocutory injunction, case no. 500-17-120468-221, at the Superior Court of Quebec.
2. My name is Lana Ponting. I was a typical, rebellious teenager, with a new stepmother. I ran away from home numerous times and finally, one day where I had run away from home, I got picked up by the police in downtown, and they phoned my parents. My parents brought me home, and then next thing I knew, I was in the Allan. A Judge, Nicholson, ordered my admittance to the Allan Memorial Institute in April of 1958. I did not like the outside of the building, it was scary looking. Inside, I noticed a smell, a strange chemical smell. Dr. Cameron assured my parents that he would take care of me. I remember going to sit in Dr. Cameron's office. Cameron then took me to a room where I had one pillow, a mattress, sheets, and a blanket. He told me to stay in the room. The nurse came in with a pole and a bag with something in it. She told me to lie down and she put the needle in my arm. I felt funny. I tried to get up but I could not. The next thing I remember, it was really awful.
3. And so it started. My balance was affected by this medication. And I saw other people walking like zombies in the hallway, and I wondered if I was like them. They gave me three pills each night. I pretended to swallow them and hid them under my pillow. The nurse came into my room, put a tape in a recorder, and she also gave me another shot. That tape kept playing "you are a bad girl" over and over. I could not get off the bed. I don't know how long I was in this state, and then it played "you're a good girl." I was given a lot of LSD, Largactil, and Sodium Amytal.
4. Some of the children I saw there were Indigenous. I would say the children there were anywhere from the ages of five to nineteen. During my stay in the Allen, I befriended a girl who I saw sitting in the hallway crying. Her name was Morningstar. She spoke English. She was a beautiful Indigenous girl. She had a long black braid that went down her back. I don't think people liked the fact that I was chumming around with an Indigenous person. But I did not care what they said. We would talk about teenage things, music and stuff like that. And then she would go in and out. She could remember things, and the next thing you know, she couldn't. It made me very sad to see her like this. I was 16, and she was 17 years old. She was telling me that people did not like her, some people made fun of her because she was an Indigenous person. So I told her, "don't worry about what people say about you." You are a beautiful person." And she would talk about her brothers and sisters. She said she had two sisters and one brother. Now I tried again to find out where she came from. And she just said "from far away". She had dark skin, and she had small eyes, they were beautiful eyes. Her eyes were also sad, awfully sad. She was a small person, not a large person, and she had on beautiful moccasins. And she said that her grandmother made them for her. They looked

like real moccasins. They weren't boots, they were real moccasins, and they were beautiful.

5. Morningstar was also given shock treatments. When I saw her in the hallway, she told me her head hurt. And I said, "well, what did they do?" She said "they put something on my head, and my body shook," and she cried at that point. Crying very sadly. I just wondered to this day, "how many other Indigenous people did Cameron do this to, and what did he do to them?" Now, I don't know what ever happened to Morningstar. I wish I knew. She just disappeared. I went looking for her one day, and I could not find her. And I asked where she was. And people said "oh, she's gone." Where did she go? I don't know. She was just gone. I don't know what tribe she was from. I wish I did. But she said she was from far away.

6. Dr. Cameron, to me, is a murderer. He gave everybody the most horrendous shots of LSD. It's my understanding that there were Aboriginal children that came to the Allan, they were small children. And Dr. Cameron would put LSD in their Kool Aid. I found this out because I listened quite carefully to what people were saying. Dr. Cameron, in my estimation, committed murder, because he knew what he was doing. Giving these people all kinds of people treatments, and then these people disappeared. Numerous people had told me that people died as a result of Cameron.

7. I would sneak out of my room at the Allan at night, and walk down the front steps and I would hide. I found people standing over by the cement wall, with shovels. Two were on one side of the wall and one was on the other side. I remember that vividly because they had red handles on the shovels and a flashlight. What were they doing with shovels over by the concrete fence? There is only one thing that comes into my mind, were they burying something in the ground. What else could it be? There were rumors that there are bodies buried in the Allan property, and I believe that some of them would be Indigenous people.

8. Dr. Cameron was in Brandon, Manitoba, prior to coming to Montreal and he treated a lot of the Indigenous people there. And then he went to Massachusetts, stayed there at the hospital for a while. In 1943 he was hired on by McGill to work at the Allan. Now, I have a press clipping from the Montreal Gazette (**Exhibit p-18**). And it's stated that the government knew about brainwashing. And why didn't they do anything about it? I questioned that. Why in heaven's name, if they knew, why didn't they do something about it? They let it go on and on and on. I understand now, that the Canadian government was one of the institutions, who were funding the experiments! Hundreds and hundreds of people were victims of Dr. Cameron.

9. The Allan was an open concept and I heard people (staff) talking. The swimming pool was not there when I was. It was put in 2 years later, but 2 years earlier, I heard somebody (staff) say "why are they building a swimming pool?" And this person said, "well, I guess to hide the bodies." So what was I supposed to think when he said that? I heard a lot of things going on the Allan. It wasn't a patient, it was the staff people talking. And then the patients started to ask, "what is going on?" "Why am I here?" "What are they doing to me?" "Why are they doing this to me?" It was horrible.

10. My doctor has given me a letter saying that I am of sound mind (**Exhibit p-15**). I have a good memory of the Allen, but I also have a bad one. Because of what Cameron

did to me, I've been on medication, and I will be for the rest of my life. I'm 81 years old now. I'm involved in a lawsuit with Consumer Law Group (**Exhibit p-20**). I want this thing brought to court. I want justice served. I have proof. I have my Allan medical records. I have proof that it harmed me. And it also harmed other families.

11. My father used to work at the National Film Board of Canada and they made a small 29 minute movie on the Allan showing it glorified and as such a lovely place to go, *Back into the Sun*, by Fergus McDonell – NFB 1956. People that were treated at the Allan went in but they never came out properly. I have been under the care of doctors since I left the Allan. I'm being treated for depression, and stuff like that. And the families of the victims, they suffered too. Their parents, grandparents, brothers, sisters, were in the Allan and they suffered too. Not just me.

12. The buildings still might contain hidden secrets, I don't know. But as far as the land is concerned, leave it alone. Leave it alone. We need to have GPR go on the ground and search for the bodies. And I think it's very mean that they want to do this, to even think about digging up the Allan property. They have no right to do that. I believe the rumors of bodies being buried on the Allan property. I believe they are true. I heard people talking about them when I was in there. Even some of the patients, you could hear them talking about bodies in the ground.

13. Cameron had a twisted, evil mind. He seemed to be doting on children quite a bit. There were constantly children coming in and out of the building, and then going outside, and then drinking Kool Aid. And Cameron also used to carry candies in his pockets. And of course, those were laced with LSD as well, I believe. I had a bad reaction to the LSD. It made me scream. It just made me scream. And it's a horrible feeling. I never took drugs when I was a teenager. But LSD was the prime thing that Cameron used. And it just made people do stupid things. It made them sick it made me cry. It made me angry. I was a child myself, for God's sake. I was only 16.

14. I was given Sodium Amytal and Largactil, electroshock treatment, and the sleep treatments. I have a hard time remembering the sleep room, I can just remember this recorder by my bed saying "you're a bad girl, you're a bad girl" over and over and over and over. And then it would say "you're a good girl." That's all I remember. I was also gang raped when I was there. And I think that's when Cameron and all of them decided to get rid of me. I was starting to really question what they were doing. So they got rid of me.

15. When they got rid of me, I don't know how that happened. I ended up in New Brunswick. I was pregnant. I went to the Interprovincial Home for Young women. I was there for approximately two or three days, and then I had to go to the hospital to give birth. How I got there. I have no idea. I have no idea what happened to the baby. The hospital told me the child was deceased, but who knows? There was a period of time where I could not remember anything. I didn't know where I was. I didn't know who I was with. So whatever he did to me, he continued to do it to me after I left the Allan. I was only there for a short period of time. I remember part of being there, but the other part of me does not want to remember. So I'm gathering from that, that it was not a very pleasant place to be. I don't remember how I got there, it just won't come to my mind at all. This is all from the few months after I was at the Allan, and there are several months

of the pregnancy that I do not remember. I cannot remember where I was when I was pregnant during that time. I could have been kept longer, perhaps, than even the records show. I'm waiting to hear back from the hospital in New Brunswick about the birth of the child and my stay there.

16. Of course, they knew what they were doing. Of course they did. That's why I called Cameron a murderer. He committed premeditated murder because people died because of him, and the treatments that he gave them. What else could you call it? I believe they purposely tried to erase my memory so I wouldn't know what happened after I left. I never told anyone what happened. I met a gentleman when I got to Halifax. I don't know how I got there. But I ended up working for Department of National Defense. Married a gentleman who was in the Navy and had a couple of kids. I never told anyone about what happened in the Allan. I never told one person. Until my brother informed me about the class action suit and sent me an email so I joined it. Over 60 years of silence.

17. Those were memories that I did not want to remember. Now I have my records and every time I look at them I think, "oh my God, did I really go through all this?" I sent a letter to every Premier in Canada, telling them what I went through. So, hopefully, to generate a little bit of hostility between the parties saying, "oh, we'll help her," "we'll help her." I never got a response from any of those Premiers.

18. Lastly, many family members of survivors of the MK ULTRA experiments support the Mohawk Mothers' request for a complete investigation of the grounds of the Allan Memorial Hospital. Here I quote the letter they have written to the City of Montreal, hereto attached as **Exhibit p-16**:

"August 17, 2022

Dear Madame la mairesse Valérie Plante,

By now, you will probably have heard of the appalling experiments conducted on innocent victims in the 40s, 50s and 60s at the Allan Memorial Institute in Montréal. Those victims were our mothers, fathers, grandparents, aunts, and uncles. Our families were irrevocably traumatized by the crimes of a few unconscionable men whose work was supported and financed by McGill University and the Canadian and US governments. And, as you may also know by now, our families are involved in a long court battle for justice and compensation for the harms we have suffered.

While that all plays out in court, our eyes are drawn back to the physical site of those grisly crimes on Mount Royal. That some of the innocent victims of Dr. Cameron's cruel experiments—the ones that never made it out alive—were potentially buried there in unmarked graves keeps us up at night. We are horrified at the possibility that construction of the New Vic Project might proceed without a very thorough and exhaustive investigation of the area's subsoil for human skeletal remains. The report, « Site de l'ancien hôpital Royal Victoria » that emerged from a public consultation led by the Office de Consultation Publique de Montréal was very clear. The report recommended that "... *les sépultures potentielles... se trouvant sur le site de l'ancien Hôpital*

Royal Victoria soient traitées avec la déférence qui s'impose; [et] que cette démarche soit rendue publique." We are writing to you today to ask how the City of Montreal and its partners in the New Vic project intend to confirm the existence of those remains, and if they exist, what plan will you make to ensure they are treated with the deference and respect they require?

Even before the courts rule on the obligations of the Canadian and US governments towards victims of Dr. Cameron's experiments at the Allan Memorial Institute, it is clear from the OCPM's recommendations that McGill University and the City of Montreal have a moral and probably legal duty to conduct a thorough and comprehensive investigation of the hospital grounds. Our families who have already suffered so much would be horrified if heavy equipment tears through that site and disturbs the remains of the victims who didn't survive those brutal and inhuman experiments of conducted at McGill University all those years ago.

We politely request, then, a meeting with your administration to explore how you plan to move forward with the OCPM's recommendations to investigate the site and dispose of the remains of victims of the Allan Memorial Institute experiments that may be found there. If a meeting is not possible, we politely request that you publicly disclose your plans to investigate the site of Allan Memorial Institute for the alleged human remains as soon as possible.

Sincerely yours,

Lana Ponting, living survivor of the Montreal Experiments
 Nancy Layton, living survivor of the Montreal Experiments
 Julie Tanny, daughter of Charles Tanny
 Lana Mills-Sowchuk, daughter of John Ivor Mills
 Linda Mills-Boismenu, daughter of John Ivor Mills
 Ann Julie McLean, AKA, Ann Diamond, child victim and daughter of Donald Alexander McLean
 Marlene Levenson, niece of Phyllis Goldberg
 Christopher Sowchuk, grandson of John Ivor Mills
 Barbara Levy, daughter of Evelyn Michael-Issenman
 Angela Bardosh, daughter of Nancy Layton
 Kimberley Jardine, granddaughter of Anna Martha Coleman Jardine
 Karen Jardine, granddaughter of Anna Martha Coleman Jardine
 Laurie Goedhuis, daughter of Ruth Agnes Brault (nee Scott)
 Patricia Edwards Roberge, daughter of Elizabeth Boyle Edwards
 Carly Thomas, granddaughter of John Ivor Mills
 Hans Dybka, son of Nini Dybka
 Peter De Giorgio, nephew of Guido De Giorgio
 Kristian Jonathan Gareau, nephew of Lana Ponting"

SWORN BEFORE ME at _____,

And I have signed at _____,

this ___ day of _____, 20__

this ___ day of _____, 20__

COMMISSIONER OF OATHS

LANA PONTING

No: 500-17-120468-221

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