

**SUPERIOR COURT OF JUSTICE  
(EAST REGION – OTTAWA)**

BETWEEN:

**MATTHEW PEGGS**  
**(Regional Commander, RCMP Ontario Division)**

Applicant

- and -

**DIERDRE MOORE**

Respondent

---

**AFFIDAVIT OF MATTHEW PEGGS, affirmed June 17, 2025**

---

I, Assistant Commissioner MATTHEW PEGGS, of London, Ontario, DO AFFIRM THAT:

1. I am the Regional Commander with the Royal Canadian Mounted Police (RCMP) for Ontario and my office is in London, Ontario. I have been in this position since September 2023 and have been employed by the RCMP for 25 years.
2. On June 12, 2025, my office received, by email a subpoena requesting my attendance to give evidence at the Ottawa Courthouse, at 161 Elgin Street in Ottawa on June 23, 24, and 25. The subpoena was issued in the City of Ottawa and is dated June 11, 2025. A copy of the subpoena is attached hereto as **Exhibit A**.
3. The subpoena also requests that I bring with me “anything in [my] possession or under [my] control that relates to the said charge.”

4. I do not have evidence to provide the Court with respect to the charges. Neither I, nor the Ontario RCMP were involved with the investigation of the charges relating to these proceedings.

Phone Call with Respondent: 2022

5. I have never met the Respondent, nor would I be able to identify her.
6. I spoke with the Respondent once via phone call, on July 18, 2022. At this time, I was employed as the Criminal Operations Officer.
7. During the phone call the Applicant told me that she was the subject of a conspiracy involving the Ottawa Police and the Ontario Ministry of the Attorney General, related to child abuse. She also advised that she intended to move to the Maritimes.
8. I advised the Applicant that she should inform her local police about the conspiracy, and that, if it met the RCMP's mandate, it would funnel up to the RCMP. I advised her of this because, on its face, the concerns she raised did not involve the RCMP's mandate in Ontario.

Emails from Respondent to Central Intake Unit: 2022-2023

9. The RCMP receives and triages many emails addressed to me that do not ever reach me personally. The RCMP's Central Intake Unit (CIU) intercepts and triages emails and determines whether they should be released to my inbox.
10. I am informed by the CIU, and do verily believe, that the Respondent attempted to contact me approximately 19 times between August 8, 2022, and July 2, 2023. The Respondent also

attempted to contact me on December 12, 2023. I did not personally review these emails. I have no knowledge of any further emails since June 2024.

11. I am further informed by the CIU, and do verily believe, that the Respondent's emails described topics including: (a) her upcoming divorce; (b) withdrawn charges involving the RCMP that are unrelated to the charges at issue in this proceeding; (c) her desire to transfer a probation order from Ontario to Newfoundland; (d) mentions of charges from Ottawa Police from when she lived in Ottawa; (e) her desire to have a file transferred from Harbour Grace, Newfoundland, to St. John's, Newfoundland; (f) domestic violence; (g) her desire to sue the Ottawa Police Services Board for extortion; (h) various charges from other jurisdictions.
12. Based on my understanding of the emails received from August 8, 2022, to December 12, 2023, as well as the December 16, 2023 date of the offences to which the subpoena relates, I believe that the emails do not pertain to the charges at issue in this proceeding.

#### *2024 Subpoena*

13. On May 28, 2024, my office received, by mail, a subpoena requesting my attendance to give evidence at the Ottawa Courthouse on August 6, 7, and 8, 2024. The subpoena was issued in the City of Ottawa and was dated May 13, 2024.
14. I had no knowledge of the charges nor material evidence to provide the Court. Counsel for the Attorney General of Canada appeared before the trial judge on July 23, 2024 to request that I be excused from testifying. This motion was adjourned to the start of the trial on August 6, 2024. My attendance in Ottawa on August 6, 2024 required me to cancel existing

engagements and to book flights and hotel accommodations. I was advised by the trial judge that the motion should have been appropriately brought in the Superior Court. The Defendant did not appear, and I was ultimately excused from testifying.

*Prior Scheduled Commitments Conflict with the Trial*

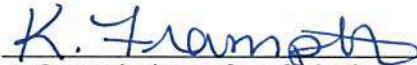
15. I have a series of priorly scheduled and essential work commitments that conflict with the trial dates. These engagements relate to an important aspect of my mandate as Commanding Officer; namely, to ensure that the Ontario division of the RCMP works efficiently and effectively with our domestic and international partners.
  - a. From June 21-22, 2025, I am meeting with the National Sheriff's Association Border Security Council. I am the only Canadian law enforcement representative attending, and it is particularly important that I attend in my capacity as Commander. I return to Toronto the night of June 22, 2025.
  - b. On June 23, 2025, I am speaking on a panel in Collingwood, Ontario with the Ontario Provincial Police Commissioner and the Toronto Police Chief to discuss the future in policing in Canada. In addition, June 23 is the 40<sup>th</sup> anniversary of the Air India tragedy; in the evening I am attending the Air India Memorial in Toronto. Attending these engagements in my capacity as Commander is essential to best represent the RCMP.
  - c. On June 24-25, 2025, I am travelling back to Collingwood to attend the Ontario Association of Chiefs of Police (OACP) annual conference. It is important that I


attend this event, as I am both a member of the Board of Directors for the OACP and will be representing the RCMP.

Attendance by Videoconference

16. If I am required to testify, I would ask that I be permitted to appear by videoconference on June 24, 2025. I will have a reliable internet connection and computer from which to testify from Toronto or Collingwood on my travels. I make this request in an effort to minimize: (a) the interruption to my work commitments; and (b) the cost associated with testifying in Ottawa, including travel costs such as transportation and hotel fees.
17. I make this affidavit in support of the application to quash the subpoena referred to at Appendix A, and for no other or improper purpose.

AFFIRMED BEFORE ME )  
at the City of London, )  
in the Province of Ontario, )  
this 17<sup>th</sup> day of June 2025 )

  
A Commissioner for affidavits in Ontario

  
MATTHEW PEGGS

Kimberley Anne Frampton, a Commissioner, etc.,  
Province of Ontario, for the Government of Canada,  
Department of Public Safety and Emergency  
Preparedness. Expires April 12, 2027.

This is Exhibit "A" referred to in the Affidavit of  
MATTHEW PEGGS, affirmed before me  
this 17<sup>th</sup> day of June 2025

  
\_\_\_\_\_  
Commissioner for Taking Affidavits

Kimberley Anne Frampton, a Commissioner, etc.,  
Province of Ontario, for the Government of Canada,  
Department of Public Safety and Emergency  
Preparedness. Expires April 12, 2027.

MATTHEW PEGGS  
(Commanding Officer, RCMP Ontario Division)

AND

DIERDRE MOORE

Applicant

Respondent

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

Proceeding Commenced at  
Ottawa

**AFFIDAVIT OF MATTHEW PEGGS**

**ATTORNEY GENERAL OF CANADA**

Department of Justice Canada  
Civil Litigation Section  
50 O'Connor Street  
Ottawa, ON K1A 0H8  
Fax: 613-954-1920

**Per: Clare Gover (LSO #83138G)**  
Fax: (613) 954-1920  
Tel: (343) 543-0576  
Email: [clare.gover@justice.gc.ca](mailto:clare.gover@justice.gc.ca)

Lawyer for the Applicant