

IN THE COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL DISTRICT OF EDMONTON

Between:

HER MAJESTY THE QUEEN

- and -

**SHAWN WILLIAM HENNESSEY and
DENNIS KEEGAN CHEESEMAN**

Accused

AGREED STATEMENT OF FACTS

1. On March 2, 2005 bailiff, Rob PERRY ("PERRY"), set out to execute a warrant authorizing the seizure on behalf of Kentwood Ford of a 2005 Ford F350 Super duty pickup truck, white in colour, Vehicle Identification Number 1FTWW31P55EA94067.
2. Based on information he received regarding the person identified in the warrant, James Michael ROSZKO ("ROSZKO"), PERRY decided to bring a partner, Mark HNATIW ("HNATIW"), along.
3. On March 2, 2005 at approximately 3:00 p.m., PERRY and HNATIW arrived at N.E. 18 – 58 – 7 W5th meridian, County of Lac St. Anne, near MAYERTHORPE,

Alberta. This property is one of three quarter-sections owned by Warren and Stephanie FIFIELD. ROSZKO, Stephanie FIFIELD's son, occupied a mobile home on this property.

4. The bailiffs observed a man standing outside of the man-door of a Quonset hut located on the property. Based on the photographs of ROSZKO seen later, the bailiffs believe this individual was ROSZKO. As they did not immediately see the vehicle in question, they proceeded to drive past the entrance to the property to get a more complete view of the property.

5. The bailiffs performed a U-turn and returned to the driveway of the property. They observed a locked steel gate across the entrance to the property, a second gate and chain-link fence further up the driveway, as well as a metal Quonset and a mobile home on the property. They saw a new white Ford truck parked near the trailer that they suspected was the vehicle they were there to seize.

6. As they returned, they observed ROSZKO enter the Quonset through the pedestrian door and close it. The bailiffs honked their horn to get ROSZKO's attention. Shortly thereafter two large dogs, one believed to be a Rottweiler, appeared from the opposite end of the Quonset and ran toward them barking and growling.

7. The bailiffs decided to call the Mayerthorpe Detachment of the Royal Canadian Mounted Police ("RCMP") for assistance. They spoke with Corporal Jim MARTIN ("Cpl. MARTIN), who advised them not to enter the property until the RCMP arrived.

8. Prior to the arrival of the police, the white pick up truck parked near the trailer was started and initially was driven towards the bailiffs at the gate, however, it veered off and travelled south across country. Both bailiffs observed

the vehicle to stop at one point. ROSZKO disembarked from the truck and appeared to be opening a gate, drove forward, disembarked on further time to close the gate and appeared to be digging in the snow. He then drove across the field and out of sight.

9. The bailiffs suspected that the departed truck was the one that they were there to seize.

10. PERRY directed HNATIW to contact the Mayerthorpe RCMP to advise that the suspect vehicle was being driven off of the property.

11. The police investigation would subsequently determine that the truck ROSZKO departed in was the subject of the civil enforcement order.

12. At approximately 3:40 p.m., Cpl. MARTIN and Constable Peter SCHIEMANN ("Cst. SCHIEMANN") arrived at the ROSZKO property. After speaking with the bailiffs, they departed to search the surrounding roads for ROSZKO and the white pickup truck. Constable Julie LETAL ("Cst. LETAL") arrived and assisted the bailiffs in getting through the first locked gate.

13. Cpl. MARTIN and Cst. SCHIEMANN returned at approximately 3:45 p.m. Pepper spray was used on the dogs inside the second gate, and the dogs were backed into a granary/shed behind the Quonset. A doghouse was positioned in front of the door to the shed, and Cst. LETAL backed her police vehicle against the doghouse to pin the dogs inside.

14. PERRY proceeded with the others to the front of the Quonset with the intention of checking the interior for the vehicle they were attempting to seize. A padlock was hanging in the clasp of the door to the Quonset, but was not locked.

15. The bailiffs and the Mayerthorpe RCMP officers entered the Quonset, with at least one officer drawing their weapon. An odour of marihuana was detected. A number of vehicles or vehicle parts were observed, consistent with a "chop shop" or a place where stolen vehicles are altered.

16. The groups proceeded through the Quonset toward the back plywood and black plastic enclosed area. Peering through a flap in the plastic, a marihuana grow-op operation was observed.

17. At approximately 4:05 p.m. Cpl MARTIN left with Cst. SCHIEMANN to obtain a Search Warrant for the ROSZKO property, leaving Cst. LETAL and Constable Trevor JOSOK ("Cst. JOSOK"), a member of the Whitecourt RCMP, to secure the scene. Cst. JOSOK had arrived while the members were inside the Quonset.

18. At approximately 5:00 p.m. contact was made with the Auto Theft Section of the Edmonton RCMP. It was determined that due to the length of time it would take to get a Search Warrant and given the lighting conditions, Constable Steve VIGOR ("Cst. VIGOR") and Constable Garrett HOOGESTRAAT ("Cst. HOOGESTRAAT") would not attend until morning.

19. Cst. SCHIEMANN returned to the ROSZKO property with Constable Brock MYROL ("Cst. MYROL"). Cst. JOSOK departed.

20. At approximately 6:30 p.m., bailiffs PERRY and HNATIW left ROSZKO's property and returned to Edmonton, Alberta. At some time prior to departing, PERRY placed a Notice of Seizure between the outside and inside doors of the mobile home located on the ROSZKO property.

21. At 7:55 p.m., Cpl. MARTIN was granted a Search Warrant for ROSZKO's property. The search team comprising of Cpl. MARTIN, Cst. LETAL, Cst. STARMAN, Cst. SANGSTER, Cst. SCHIEMANN and Cst. MYROL was assembled.

22. The search team arrived at the ROSZKO property and at approximately 8:40 p.m. commenced the search. It was discovered that the grow operation was larger than originally thought.

23. At approximately 9:30 p.m., Cpl. MARTIN made contact with Corporal Lorne ADAMITZ ("Cpl. ADAMITZ") of the Edmonton RCMP Green Team. The Green Team is a specialized unit responsible for the investigation and processing of relatively large scale commercial drug operations. Cpl ADAMITZ agreed to put together a team and attend immediately.

24. Between 9:30 p.m. and 10:00 p.m., Uptown Towing was contacted to remove stolen property from the Quonset and between 10:00 p.m. and 10:30 p.m., they removed the following: a Wermac generator, a 1997 motorcycle, two 1998 Honda motorcycles, a 2003 red GMC truck, a 2002 Grey Ford F350 truck, a 1990 John Deere garden tractor and automotive parts.

25. At 00:30 on March 3, 2005, the Green Team arrived with Cpl. ADAMITZ, Cst. Al GOULASH, Cst. Ray SAVAGE and a member of the Edmonton City Police Green Team Unit. By 2:30 a.m. they had dismantled the grow operation and seized 280 plants of marihuana along with other grow operation paraphernalia, including harvesting books and other documents relating to the grow operation.

26. On March 3, 2005 at 3:00 a.m., the search was complete, except for the removal of the John Deere garden tractor, some automotive parts, chopped up truck frames and a truck shell in the back of the property. Constable Lionide JOHNSTON ("Cst. JOHNSTON") of the Mayerthorpe RCMP and Constable Anthony GORDON ("Cst. GORDON") of the Whitecourt RCMP were called in to maintain security of the ROSZKO property until the arrival of members of the Edmonton RCMP Auto Theft Unit later that morning.

27. At 9:30 a.m., Cst. SCHIEMANN (not dressed in RCMP uniform as he was to attend Edmonton on other police business) drove from Mayerthorpe to ROSZKO's property to drop off Cst. MYROL who was going to assist in the search effort that morning.

28. At approximately 9:56 a.m. Constable Garrett HOOGESTRAAT (Cst. HOOGESTRAAT) and Constable Steven VIGOR (Cst. VIGOR), both of the Edmonton RCMP Auto Theft Unit arrived at ROSZKO's property.

29. Upon their arrival, they noted Cst. GORDON, Cst. JOHNSTON, Cst. MYROL and Cst. SCHIEMANN behind the Quonset in the area of the small shed feeding drugged meat to ROSZKO's dogs in an effort to sedate them. They parked toward the southwest corner of the Quonset near the shed. Cst. VIGOR remained in the vehicle for about a minute writing notes while Cst. HOOGESTRAAT exited the vehicle.

30. Cst. HOOGESTRAAT spoke briefly with Cst. GORDON. Cst. GORDON along with Cst. JOHNSTON, Cst. MYROL, and Cst. SCHIEMANN then walked toward the front of the Quonset. Cst. VIGOR exited the vehicle and joined Cst. HOOGESTRAAT at the rear of his vehicle where they were about to change into coveralls and commence their investigation.

31. Cst. VIGOR and Cst. HOOGESTRAAT heard two loud bangs, but were unsure what had caused the noise. Immediately thereafter, they heard a further quick succession of bangs. In addition, they heard screams. Cst. HOOGESTRAAT and Cst. VIGOR now recognized the sounds as gunfire. They both drew their weapons and ran toward the east end of the Quonset.

32. Cst. VIGOR directed Cst. HOOGESTRAAT to call for backup. Cst. HOOGESTRAAT returned to their vehicle to call 9-1-1. That call was received at 10:01 a.m., Cst. VIGOR then ran around one of the parked police vehicles and

approached the open doors of the Quonset.

33. ROSZKO walked out of the Quonset from the large door carrying what Cst. VIGOR believed to be a hunting rifle, and what appeared to be a semi-automatic assault rifle. ROSZKO appeared to be surprised, raised the assault rifle and discharged two rounds at Cst. VIGOR, narrowly missing him by six to eight inches. The passenger's window and side view mirror of the police cruiser were struck in the process.

34. Cst. VIGOR returned fire with his service sidearm, directing two shots at ROSZKO. ROSZKO was noted by Cst. VIGOR to stumble back into the Quonset. It was later determined ROSZKO was hit twice by Cst. VIGOR, once in the hand and once in the thigh. Both of these wounds were non-fatal. ROSZKO returned, out of sight, to the interior of the Quonset.

35. Cst. HOOGESTRAAT backed their police vehicle near an adjacent sand pile giving Cst. VIGOR cover to retreat. The vehicle was parked in a position to maintain visual observation of the Quonset awaiting the arrival of the RCMP Emergency Response Team (ERT). At the south end of the main door, the leg of one of the peace officers was partially visible. Requests were made over the police radio for communication from the officers inside the Quonset, however, the only sound heard was from the officer's portable radios.

36. Once Cst. VIGOR joined Cst. HOOGESTRAAT in their vehicle, he contacted the ERT team and Cst. HOOGESTRAAT called in a request for an Explosive Disposal Unit Remote Mobile Investigator (EDU-RMI).

37. At approximately 12:05 p.m. the ERT team arrived on scene. At approximately 12:20 p.m., the EDU team arrived on scene.

38. The EDU unit robot was deployed at approximately 1:40 p.m. to video the

inside of the Quonset in an attempt to ensure that no continued threat existed. The robot's video depicted Cst. GORDON near the entrance to the Quonset. ROSZKO was located a little further inside and toward the northeast side. Cst. JOHNSTON and Cst. SCHIEMANN were located near the centre of the Quonset. Cst. MYROL could not be seen by the robot. No indications of life were observed.

39. ROSZKO was observed lying on his back. A 9 mm semi-automatic Luger handgun, make Beretta, model 92 FS, was tucked into the waist band of his pants. Laying to the right side of ROSZKO was a .300 Winchester Magnum, bolt action, repeating rifle, model 70 XTR Sporter Magnum ("the RIFLE"). It was later determined that the RIFLE was owned by John HENNESSEY, the grandfather of the accused, Shawn William HENNESSEY ("HENNESSEY"). A semi-automatic .308 Heckler and Koch, model HK 91, assault rifle was between his legs.

40. The ERT team was then deployed and entered the Quonset. The weapons were removed from the proximity of ROSZKO, and he was rolled over and handcuffed. Cst. MYROL was eventually located near a rear door which was padlocked from the outside. Two of the officers were dragged outside in the hope of possible resuscitation. It was then determined that all four peace officers and ROSZKO were deceased.

41. A forensic examination of the crime scene later determined 19 shell casings were positively associated to the Heckler and Koch, along with 13 fired bullets that could have been fired from that semi-automatic rifle. Neither the .300 calibre rifle nor the 9mm Luger pistol was fired by ROSZKO.

42. A firearms expert determined that Cst. JOHNSTON had discharged a round from his 9 mm Luger Smith & Wesson at ROSZKO, however that bullet struck the butt plate of the handgun tucked in ROSZKO's waist band. Cst. JOHNSTON's service handgun failed to properly eject the shell casing, thereby

preventing Cst. JOHNSTON from firing again.

43. Autopsies were performed by a Provincial Medical Examiner, Dr. Bernard BANNACH, on March 3, 2005.

44. In relation to Cst. SCHIEMANN, Dr. BANNACH found that there were multiple gunshot wounds. There was a perforating gunshot wound of the right side of the chest and another perforating gunshot wound of the left thigh. In addition, there was a superficial penetrating gunshot wound of the left wrist. In Dr. BANNACH's expert opinion the cause of death was as a result of multiple gunshot wounds.

45. In relation to Cst. GORDON, Dr. BANNACH determined that there were two perforating gunshot wounds of the torso, one of the chest and one of the abdomen. Similarly, Dr. BANNACH was of the opinion that Cst. GORDON died as a result of multiple gunshot wounds.

46. In relation to Cst. JOHNSTON, Dr. BANNACH noted four gunshot wounds with involvement of the chest, neck, face, upper extremities, pelvis, abdomen and lower extremities. Similarly, the cause of death was noted to be as a result of multiple gunshot wounds.

47. Finally, in relation to Cst. MYROL, Dr. BANNACH noted a perforating gunshot wound of the head, with massive damage to the skull and scalp, and evisceration of the brain. Dr. BANNACH also noted a second superficial grazing type gunshot injury to the lateral left hip region. It was Dr. BANNACH's opinion that Cst. MYROL died as a result of a gunshot wound to the head.

48. Dr. BANNACH also performed the autopsy on ROSZKO and determined that ROSZKO died of a self-inflicted gunshot wound to the left side of his chest, with the entrance wound being consistent with the Heckler and Koch. There

were also gunshot wounds to his hand and his thigh, neither of which would have been fatal. Those latter two wounds were consistent with the two shots fired by Cst. VIGOR at ROSZKO.

49. The RCMP commenced an extensive investigation to try to determine, amongst other things, how ROSZKO returned to his farm to ambush and murder the four peace officers and whether or not he had received any type of assistance. Additionally, the police wanted to determine how ROSZKO had armed himself with respect to the .300 Winchester as it was discovered through the National Firearms Registry that that particular rifle was in fact, legally registered to John HENNESSEY who, as previously noted, is the grandfather of the accused HENNESSEY.

50. The police further conducted numerous interviews of relatives of ROSZKO and executed search warrants with respect to ROSZKO's cell phone.

51. Red Deer ERT members had approached from the north side of the Quonset. After their entry into the Quonset, someone mentioned seeing a bed sheet on the north side by the east corner of the Quonset. Later, in addition to the bed sheet, a pillow case containing a pair of work gloves along with a small water bottle and a can of "Bear Scare" pepper spray was seized from the location. These items were seized by Cst. Garry LOTOSKI ("Cst. LOTOSKI"), and continuity of the items was maintained by the RCMP. They were personally delivered by Cst. LOTOSKI to the RCMP Forensic Laboratory in Edmonton on March 31, 2005. Subsequently, it was forensically determined that an area of the left glove between the index finger and middle finger contained DNA which was a DNA match to the accused, HENNESSEY.

52. Sometime between 2:00 p.m. and 3:30 p.m. on March 2, 2005, ROSZKO

called his aunt, Ann CHAYKA, ("CHAYKA") looking for his mother, Stephanie FIFIELD ("FIFIELD"). ROSZKO called again about an hour later, sounding somewhat anxious and indicating that there was a situation occurring in his yard. Subsequent discussions occurred between FIFIELD and CHAYKA wherein FIFIELD sought permission on behalf of her son to park the white truck at CHAYKA's residence. CHAYKA didn't give her permission, however, when she awoke in the morning, she noted that ROSZKO's truck that the police were seeking had in fact been parked in her yard over night. ROSZKO was no where to be seen, however, CHAYKA did know via further contact from her sister, FIFIELD, that there were helicopters, police cars and ambulances in ROSZKO's yard. The distance from the CHAYKA property to ROSZKO's property was later determined to be 38.5 km.

53. The search of the Telus cell phone records relating to ROSZKO's cellular phone indicated that between 3:34 p.m. and 4:37 p.m. on March 2, 2005, ROSZKO placed one phone call to Kal Tire in Barrhead and numerous calls were made between ROSZKO and a "bag phone" then utilized by the accused, HENNESSEY, by virtue of his employment with Kal Tire. Additionally, numerous calls were made to HENNESSEY's residence. The last call made by the bag phone was to HENNESSEY's residence was at 5:24 p.m. The bag phone was not used again until March 4, 2005.

54. ROSZKO asked HENNESSEY if he could hide his truck at the HENNESSEY residence, however, HENNESSEY steadfastly refused. At one point, HENNESSEY was aware that ROSZKO was at his residence by reason of a phone call received from his wife, Christine HENNESSEY. HENNESSEY also spoke to ROSZKO at that time on the telephone.

55. HENNESSEY stopped briefly at Jessie ZASIEDKO's house during the evening of March 2, 2005. HENNESSEY was seeking his brother-in-law, the accused, Dennis Keegan CHEESEMAN, ("CHEESEMAN"), HENNESSEY is married to

CHEESEMAN's sister, Christine. HENNESSEY was apparently aware that CHEESEMAN was helping Jessie ZASIEDKO move. HENNESSEY asked CHEESEMAN to speak to him alone, and indicated that he needed CHEESEMAN'S help because there were RCMP officers at ROSZKO's farm, and HENNESSEY was involved in the grow operation located on ROSZKO's property. He further asked CHEESEMAN to get home as soon as he could. CHEESEMAN knew ROSZKO as he, like HENNESSEY, had done odd jobs from time to time for ROSZKO on ROSZKO's property. These jobs involved menial labor such as the digging of holes for the planting of trees. CHEESEMAN, unlike HENNESSEY, had no involvement with respect to any of the illegal operations on the ROSZKO property.

56. As previously mentioned, CHAYKA received a telephone call from FIFIELD at approximately 8:00 p.m., wherein CHAYKA advised FIFIELD that ROSZKO had called looking for her. FIFIELD advised CHAYKA that there were a number of police vehicles in ROSZKO's yard.

57. ROSZKO's cell phone records indicate that he initiated calls to FIFIELD's residence at 8:13 p.m., 8:28 p.m., 9:59 p.m., 10:21 p.m., and 11:55 p.m. on the 2nd of March 2005.

58. At approximately 10:30 p.m. on March 2, 2005, that CHAYKA received a phone call from FIFIELD wherein she received ROSZKO's request to park his white pickup truck at CHAYKA's residence. CHAYKA indicated that ROSZKO did not have her permission.

59. After watching the driveway for a period of time, CHAYKA telephoned FIFIELD to report that ROSZKO had not arrived with his truck at her residence, and that CHAYKA was going to retire for the evening.

60. FIFIELD continued to watch the ROSZKO residence throughout the night.

She could see vehicles driving in and out, and assumed that they were police vehicles based upon what she had seen in the daylight. She also noted, at some point, that she saw lights on in ROSZKO's trailer.

61. When CHEESEMAN returned home to the rural residence he shared with his sister Christine and his brother-in-law, HENNESSEY, in the later evening hours of March 2, 2005, he found ROSZKO and HENNESSEY sitting at the kitchen table. It was evident to CHEESEMAN that Christine and her children were home, however, were avoiding ROSZKO.

62. ROSZKO had arrived at the residence with the Luger handgun in the waist band of his pants, and was seeking the rifle that HENNESSEY had been given by his grandfather, John HENNESSEY, a few years prior.

63. HENNESSEY wiped the .300 Winchester Magnum rifle down; he provided it to ROSZKO as well as a box of ammunition intended for use in that rifle.

64. When CHEESEMAN viewed that situation, he took it upon himself to go downstairs and retrieve a white pillow case and some gloves. CHEESEMAN then put on the gloves and stuck the HENNESSEY rifle in the pillow case.

65. It was clear to all present that ROSZKO was enraged at the police, and ROSZKO made comments to the effect that he intended to return to his property and burn down the Quonset that contained the illegal marihuana grow and chop shop operation.

66. Both HENNESSEY and CHEESEMAN knew that armed confrontation with the police was a real possibility and that the situation was clearly trouble.

67. ROSZKO decided that he would hide the sought after truck at CHAYKA's residence, and the two accused agreed to follow him there in order to give him

a ride back to his residence.

68. HENNESSEY asked CHEESEMAN to accompany him for support and comfort. Both men were intimidated and fearful of ROSZKO. They followed ROSZKO to CHAYKA's residence in HENNESSEY's Dodge Neon. During that trip of approximately a half an hour, the two accused were relatively quiet. When they arrived at the CHAYKA residence, they pulled over and waited near the highway while ROSZKO drove the white truck and parked it down the CHAYKA driveway. During this time period, the two accused discussed leaving ROSZKO there, however, decided not to act upon that plan. ROSZKO ultimately reappeared on foot carrying the HENNESSEY rifle, with the handgun still tucked into the waist band of his pants. CHEESEMAN exited from the front passenger seat, vacating that seat for ROSZKO. ROSZKO slid the rifle with the pillow case into the back seat next to CHEESEMAN.

69. During the trip from CHAYKA's, CHEESEMAN and HENNESSEY did not converse with ROSZKO, but ROSZKO ranted and complained about the RCMP, and threatened to get even with them. He indicated that he was going to burn down the Quonset. CHEESEMAN described his rantings as "devil talk".

70. ROSZKO directed HENNESSEY to drive past the range road on which he lived, and to proceed to the next range road where his mother lived. He directed HENNESSEY to drive past his mother's residence and to stop across the field from where the police were located. The two accused could see the lights from the police cars that early morning of March 3, 2005, and ROSZKO paused to pull socks over the outside of the boots he was then wearing. ROSZKO grabbed the HENNESSEY rifle from the back seat and proceeded off in the direction of the police, sometime in the early morning hours of March 3, 2005, and most likely between 1 a.m. and 3 a.m.

71. HENNESSEY and CHEESEMAN departed and drove directly home.

CHEESEMAN suggested that they should call the police and warn them about ROSZKO, however, HENNESSEY discouraged that idea, and felt that ROSZKO would come after them should he evade police. Neither accused made such a phone call to police.

73. Later the same morning, HENNESSEY departed his residence for a Kal Tire meeting at the Mayfield Inn in Edmonton that commenced at 7:00 a.m. or 8:00 a.m. HENNESSEY remained at that meeting for the majority of that day and did not learn what had transpired at the ROSZKO farm until he heard it on the radio on his way home to his Barrhead area residence. HENNESSEY indicated that he would have arrived home between 4:00 to 5:30 p.m.

74. Similarly, CHEESEMAN went to work at Sepallo Foods at 7:00 a.m. that same morning and left work at 1:30 p.m. claiming a family emergency. In fact, CHEESEMAN left work when he had heard about the murder of the four peace officers on the ROSZKO farm.

75. HENNESSEY was aware that the rifle he had provided to ROSZKO was in fact registered to his grandfather, John HENNESSEY. The senior HENNESSEY had provided the rifle to Shawn HENNESSEY when he believed the Government planned upon eliminating the gun registry requirements. John HENNESSEY believed that he gave the rifle to HENNESSEY in early 2003 or late 2002.

76. HENNESSEY and his mother, Sandy HENNESSEY, discussed the fact that the rifle was registered to John HENNESSEY and that the RCMP would undoubtedly follow-up on that aspect of the investigation by questioning John HENNESSEY. As a result, contact was made with the senior HENNESSEY, and the accused told John HENNESSEY that ROSZKO had the .300 Winchester Magnum. John HENNESSEY indicated that he was quite sure that it was his own suggestion that they all "story" to the police the notion that the rifle had been stolen from the back of John HENNESSEY's welding truck.

77. Following an extensive RCMP investigation, the accused CHEESEMAN was arrested on July 7, 2007, and the accused, HENNESSEY, was arrested on July 8, 2007.

Pursuant to the provisions of Section 655 of the *Criminal Code of Canada*, the above paragraphs contain facts, which are alleged by the Crown and admitted by the Accused, Shawn William HENNESSEY, and the Accused, Dennis Keegan CHEESEMAN, for the purpose of dispensing with formal proof thereof at trial.



SHAWN WILLIAM HENNESSEY



D'ARCY DEPOE

Counsel for the Accused, Hennessey

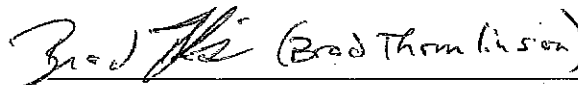


EDMOND O'NEILL

Counsel for the Accused, Hennessey



DENNIS KEEGAN CHEESEMAN



for

PETER NORTHCOTT

Counsel for the Accused, Cheeseman



DAVID A. LABRENZ

Agent of the Attorney General

No. 070845441Q1

Exhibit Tag
Court of Queen's Bench

Case No.	070845441Q1
Case Name	REGINA
	VS
	HENNESSEY/CHEESEMAN
Marked Ident.	Entered Exhibit No.
	S-1

Submitted By

Crown/Plaintiff Defence/Respondent

DM Jan-19/02
Date Clerk

J 1950 Rev Aug 95

IN THE COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL DISTRICT OF EDMONTON

BETWEEN:

HER MAJESTY THE QUEEN

-and-

**SHAWN WILLIAM HENNESSEY and
DENNIS KEEGAN CHEESEMAN**

Accuseds

AGREED STATEMENT OF FACTS

DAVID A. LABRENZ
ALBERTA JUSTICE
CROWN PROSECUTORS OFFICE
1100, 400 - 4 AVENUE SOUTH
LETHBRIDGE, ALBERTA