

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

JOANNE ST. LEWIS

Plaintiff

and

DENIS RANCOURT

Defendant

AFFIDAVIT

of Municipality of Châteauguay at Quebec
1. **Claude Lamontagne**, of the ~~City of OTTAWA~~, in the Province of ~~Ontario~~, MAKE OATH AND AFFIRM AS FOLLOWS:

1. I am a tenured Associate Professor in the School of Psychology, Faculty of Social Sciences, at the University of Ottawa where I have pursued my teaching and research career since 1977, following my Ph.D. (In the Faculty of Science and Engineering at the University of Edinburgh, U.K.) conferred in 1976, my B.Psy. conferred in 1970, and a B.A. conferred in 1967.
2. I was the recipient of several prestigious university teaching awards, including the 3M National Teaching Award, in 2003, for my courses over many years in the areas of cognition and perception.
3. My general area of research and expertise is cognitive science, an area in which I have authored and co-authored two books, published several research journal articles, and presented numerous communications at national and international research conferences.
4. More specifically, my research deals with cognitive dynamics, i.e. how percepts (sights, sounds, odours etc.), concepts (i.e. ideas, thoughts, opinions etc.) and affects (i.e. emotions, moods, feelings, attitudes etc.) interact in the fabric of everyday experience and behaviour.
5. It is widely held by specialists in this area of research (1) that taboo words trigger significantly greater affective responses than neutral words, and (2) that affective response impacts rational appreciation.

6. The word "negro" is a taboo word. It therefore carries stronger emotional impetus than ordinary words in post-lexical cognitive processing; an emotional impetus likely to cause defined socio-political terms such as "house negro" to be misinterpreted.
7. I am aware of the legal conflict in the instant action to the extent that I have read the blog posts at issue on the "U of O Watch" blog and I have read the Statement of Claim.
8. From dictionary entries, racist communication, irrespective of the race of the originator, is one where the meaning and intent are to suggest or to advance or to posit that some quality, character or ability is intrinsically attributable to race – a quality, character or ability which is not *prima facie* attributable to race, and that one race is thereby inferior to another.
9. By this definition, calling a black person a "house negro" cannot be considered racist, as the term does not suggest any intrinsically racial attribute. It is a criticism and may be an insult (depending on the context) but it is not racist. It may, depending on the context, be insensitive and carry sting but it is not racist.
10. Therefore, interpreting calling a black person "house negro" as racist is best explained as an emotionally-tainted and fallacious understanding of the *global* term 'house negro', caused by the emotional potency of the *local* taboo word 'negro'.
11. Many in my area of research are of the opinion that the cognitive annoyance arising from such affectively tainted rationality is best regulated in the market place of people's reactions in our free societies.
12. In conclusion, any trier of fact faced with allegations of racist communication should (i) use the formally accepted definition of racism as the proper gauge, and (ii) be cognisant of the bias caused by the psychological impact of taboo words. I find no racism in the use of the term "house negro" in the blog communications of the Defendant.

Sworn and affirmed before me at the City of
Ottawa, Ontario, on

25 Aug 2011

Commissioner for Taking Affidavits
(or as may be)

Tim Gault

(Signature of deponent)
Claude LAMONTAGNE

RCP-E 4D (July 1, 2007)