COURT FILE NUMBER QBG-SA-00766-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE

SASKATOON

PLAINTIFFS

CAITLIN ERICKSON, JENNIFER SOUCY (BEAUDRY) and STEFANIE HUTCHINSON

DEFFENDANTS

KEITH JOHNSON, JOHN OLUBOBOKUN, KEN SCHULTZ, NATHAN RYSAVY, DUFF FRIESEN, LYNETTE WEILER, JOEL HALL, LOU BRUNELLE, JAMES RANDALL, KEVIN MACMILLAN, DAWN BEAUDRY, NATHAN

MACMILLAN, DAWN BEAUDRY, NATHAN SCHULTZ, AARON BENNEWEIS, DARCY SCHUSTER, RANDY DONAUER, JOHN

THURINGER, MILE TWO CHURCH INC., THE GOVERNMENT OF SASKATCHEWAN, JOHN

DOES and JANE DOES

AFFIDAVIT

AFFIDAVIT OF STEFANIE HUTCHINSON, SWORN MARCH 14TH, 2025.

I, STEFANIE HUTCHINSON, of the City of Victoria, British Columbia, MAKE OATH AND SAY:

- I am one of the Proposed Representative Plaintiffs in this action and as such, have knowledge
 of the matters herein deposed to. The evidence contained in this affidavit is based on my
 personal knowledge or on information provided to me, in which case I indicate the source of
 the information and believe it to be true.
- I was born in Saskatoon, Saskatchewan, on July 4, 1988. I was raised in Saskatoon by my
 parents, Judith Hutchinson and Michael Hutchinson, alongside my three older siblings. I
 currently reside in Victoria, British Columbia.
- 3. In approximately 1984, my parents started attending Saskatoon Christian Centre Inc., presently known as Mile Two Church Inc., situated at 102 Pinehouse Drive, Saskatoon, Saskatchewan (the "Church"). The Church was initially incorporated as Saskatoon Christian Centre Inc. on October 17, 1997, changing its name to Mile Two Church Inc. on

March 12, 2018. True copies of the Certificate of Incorporation for Saskatoon Christian Centre Inc. and Certificate of Amendment dated March 12, 2018, changing the name from Saskatoon Christian Centre Inc to Mile Two Church Inc., are attached as Exhibit "A" to the Affidavit of Caitlin Sheridene Erickson, sworn March 13th, 2025 (hereinafter "Caitlin's Affidavit"),

- 4. I started attending the Church with the rest of my family after I was born in 1988.
- 5. My siblings and I were all enrolled at Christian Centre Academy, which later became Legacy Christian Academy. In or about August 2024, Valour Academy Incorporated was incorporated and assumed operation of the school which had previously operated as Christian Centre Academy and then Legacy Christian Academy. A true copy of the profile report for Valour Academy Incorporated is attached as Exhibit "B" to Caitlin's Affidavit. The school is hereinafter referred to as "CCA", which is and was the Church's affiliated Christian school. I began attending kindergarten at CCA in the fall of 1993 and remained at CCA until I graduated in June of 2006. My three older siblings also attended CCA from kindergarten to grade 12 as well.
- 6. I am currently a Family Physician working in Urgent and Primary Care and do some consult inpatient addictions medicine in another province. I left the Church in fall of 2009. I had no real plan for my life at the time, all I knew was that I couldn't stay at the Church. I had a government job at the time that provided a much-needed sense of stability in the midst of that upheaval, but beyond that, I had no idea what I was working toward. I took classes on and off for years, juggling full-time work and life, until I eventually completed my undergraduate Bachelor of Science degree. Even then, the idea of pursuing medicine felt distant, almost impossible, like something for other people who had always known they belonged in that world. It took years and a lot of therapy to unlearn the deeply ingrained belief that I wasn't capable of something so ambitious. I believe that I was able to become a physician despite my experiences at the Church and CCA, not because of them.
- 7. I am prepared to act as a Representative Plaintiff in this Action on behalf of all the former students that attended CCA and/or the Church (the "Proposed Class Members"). I have agreed to act in this capacity jointly with Caitlin Erickson and Jennifer Soucy (Beaudry).

- 8. I further understand that the major steps in a class action are generally as follows:
 - a) Commencement of the action by issuance of a Statement of Claim, which was done in this case on August 8, 2022, and subsequently amended;
 - b) Motion for Certification;
 - c) Notice to the Class of certification and the right to opt out;
 - d) Discovery and Production of Documents (listing of relevant documents);
 - e) Questioning (lawyers asking me questions under oath);
 - f) Any Court conferences required;
 - g) Trial of the common issues;
 - h) Notice to the Proposed Class Members because individual participation is required;
 - i) Determination of individual issues;
 - j) Distribution of proceeds of resolution by way of judgment or settlement;
 - k) Appeals (at various stages);
 - 1) Settlement Discussions (at any time); and
 - m) Various other interim applications that may be made to the Court from time to time.
- 9. I also understand that, in agreeing to seek and accept an appointment by the Court as a Representative Plaintiff, it is my responsibility to, among other things:
 - a) Become familiar with the issues to be decided by the Court;
 - b) Review the Statement of Claim and any amendments;
 - c) To assist in the preparation and execution of an Affidavit in support of the Motion for Certification;
 - d) Attend, if necessary, with Class Counsel for any cross-examinations on the Affidavits;
 - e) Attend, if necessary, with Class Counsel for a questioning where I, or others, will be asked questions under oath;
 - f) Attend to preparation and execution of an Affidavit of Documents (listing documents I have in my possession and/or control relevant to this Action);
 - g) Attend with Class Counsel at the trial(s) and give evidence regarding the case;
 - h) Receive briefings from Class Counsel;

- i) Express my opinion on the strategy and issues raised by and with Class Counsel;
- j) Express my opinion to Class Counsel and to the Court on any offers to settle;
- k) Express my opinion to Class Counsel and to the Court if settlement positions are to be formulated;
- 1) Provide instruction to Class Counsel as required; and
- m) Provide evidence in support of Court approval of any settlement.
- 10. To date I have taken the following steps to fairly and adequately represent the interest of the members of the Proposed Class Members:
 - a) I retained the law firm Scharfstein LLP to act as Class Counsel;
 - I assisted in the creation of a committee of the Proposed Class Members who provide assistance, guidance, and advice in pursuit of this action (the "Steering Committee");
 - c) I am a member of the Steering Committee for the action, for which I arrange and attend meetings regularly;
 - d) I have regularly discussed this action with other Proposed Class Members and members of the Steering Committee;
 - e) I have read, commented upon, and approved the Statement of Claim and amendments thereto;
 - f) I aided in drafting this affidavit; and
 - g) I have read Catilin's Affidavit and have reviewed the Exhibits attached thereto (throughout this Affidavit, I refer to various Exhibits that are attached to Caitlin's Affidvit).
- 11. I intend to take the following steps to continue to fairly and adequately represent the interest of the Proposed Class Members:
 - a) To continue to interact with other Proposed Class Members, receive their input, and generally act as a conduit for information to and from Class Counsel;
 - b) To attend information meetings with the other Proposed Representative Plaintiffs and Class Counsel, and to continue to attend Steering Committee meetings; and
 - c) To instruct Class Counsel as needed.

- 12. I have reviewed the Litigation Plan attached as Exhibit "C" to Caitlin's Affidavit, which includes, among other things, Notice to Proposed Class Members if the action is certified. I have reviewed the notice program and believe that, if implemented, it would notify a majority of the Proposed Class Members. I do not have any expertise which would permit me to evaluate the legal aspects of the Litigation Plan, but I am advised by Class Counsel, and believe it to be true, that this Litigation Plan has been formulated by Class Counsel and that they will be urging the Court to adopt it.
- 13. I believe that I can fairly and adequately represent the interests of the Proposed Class Members, and I am committed to fulfilling my responsibilities.
- 14. To the best of my knowledge, I do not have, on the common issues, an interest that is in conflict with the interest of other Proposed Class Members.
- 15. I believe that a class proceeding is preferable to requiring each Proposed Class Member to bring an individual claim against the Defendants. I would not be able to afford this litigation as an individual Plaintiff. I have been advised by many Proposed Class Members, and believe it to be true, that:
 - a. They would not be able to afford the costs of such litigation;
 - b. Many Proposed Class Members are still very emotionally troubled by the abuse they suffered at CCA and/or the Church, and that forcing them to bring an individual claim would cause them to be re-victimized; and
 - c. The Proposed Class Members that I have spoken to have advised that they would prefer a class proceeding such as this.
- 16. Class Counsel has prepared and included an Intake Form on its website for any Proposed Class Member to complete. Attached to Caitlin's Affidavit as Exhibit "D" is a true copy of the Intake Form on Class Counsel's website at the following URL:

https://scharfsteinlaw.com/app/uploads/2022/08/Intake-and-Assessment-Form-Final.pdf

17. I am advised by Class Counsel, and believe it to be true, that, to date, approximately 104 Class Members have submitted an Intake form to Class Counsel. Such Intake Forms were

- provided to Class Counsel with an explicit expectation of confidentiality until and unless their use is otherwise authorized.
- 18. I am advised by Class Counsel, and believe it to be true, that Class Counsel was authorized to provide 46 redacted versions of the Intake Forms, by the individuals who had submitted those Intake Forms, to the experts retained in this matter by Class Counsel, so as to allow the experts to prepare expert reports. Copies of these 46 redacted Intake Forms are attached to Caitlin's Affidavit as Exhibit "E". I am advised by Class Counsel, and believe it to be true, that many of the 104 Intake Forms were received by Class Counsel after the redacted Intake Forms had been provided to the experts.
- 19. I am advised by Class Counsel, and believe it to be true, that the redactions were prepared by Class Counsel at the request of individuals who submitted an Intake Form so as to limit the disclosure of any information which could be used to identify the victims at this time.
- 20. I am advised by Class Counsel, and believe it to be true, that they continue to receive Intake Forms from Proposed Class Members.
- 21. In this Affidavit, I will describe:
 - a) My family and my background at the Church and CCA;
 - b) The atmosphere and culture at CCA and the Church, which was one of fear, intimidation, and manipulation designed to break the will of a child, and included physical, sexual, and psychological abuse;
 - c) Some examples of the activities and conduct that I am aware of, that I heard of, or that I witnessed;
 - d) Some examples of my own experiences of abuse; and
 - e) The ongoing effects of the abuse I endured throughout my time at CCA and the Church.

Background

22. Throughout my affidavit I will be referring to several individuals. For ease of reference, the following are the individuals that I will be referring to, along with my understanding of the timeline and description of their role at CCA and/or the Church:

- a) Keith Johnson ("K. Johnson") was the head of the entire organization, and his title was head pastor of the Church for the entire time that I attended CCA and/or the Church.
- b) Ken Schultz ("K. Schultz") served as the Director of CCA when I first started attending in 1993, and subsequently served as the Director of Faith College International ("FCI") starting in fall of 2003 and including when I attended FCI for two years from 2006 to 2008. K. Schultz was also an elder of the Church. K. Schultz is currently criminally charged with two counts of assault with a weapon pursuant to Section 267 of the Criminal Code, two counts of sexual assault against a minor pursuant to Section 271 of the Criminal Code, and one count of invitation to touch pursuant to Section 152 of the Criminal Code, all of which was related to his position at CCA and the Church.
- c) Elaine Schultz ("E. Schultz") (deceased) was the wife of K. Schultz and acted as a counsellor for various members of the Church, and to students who attended FCI. I was assigned E. Schultz as my counsellor when I started as a student at FCI in 2006.
- d) Lou Brunelle ("L. Brunelle") served as the principal of CCA when I first started attending in 1993 until approximately 2001.
- e) John Olubobokun ("J. Olubobokun") served as the director of CCA from approximately 2003 to 2009, and was an elder in the Church. J. Olubobokun is currently criminally charged with nine counts of assault with a weapon pursuant to Section 267 of the Criminal Code.
- f) Duff Friesen ("D. Friesen") worked as both a teacher and later the principal of CCA between 1987 and 2007. D. Friesen was my "supervisor" when I was in Level 7, which is the equivalent of grades 11 and 12. D. Friesen is currently criminally charged with 11 counts of assault with a weapon pursuant to Section 267 of the Criminal Code.
- g) Andrea Johnson ("A. Johnson") served as a volunteer staff member in the youth ministry.
- h) Nathan Rysavy ("N. Rysavy") was a male teacher at CCA, and I was in his classroom from 1999 to 2001 for Level 5, which is the equivalent of grades 6 to 8.

- i) John Power ("J. Power") (deceased) was an elder in the Church during my time at CCA and the Church.
- j) John Thuringer ("J. Thuringer") was an elder in the Church during my time at CCA and the Church.
- k) Carla Thuringer ("C. Thuringer") was an elder in the Church during my time at CCA and the Church.
- I) James (or Jim) Randall ("J. Randall") was an elder in the Church during my time at CCA and the Church. J. Randall and his wife, C. Randall, were responsible for overseeing the children's church when I was a minor congregant of the Church.
- m) Catherine Randall ("C. Randall") was an elder in the Church during my time at CCA and the Church. C. Randall and her husband, J. Randall, were responsible for overseeing and operating the children's church when I was a minor congregant of the Church.
- n) Randy Donauer ("R. Donauer") was in a leadership position at CCA and the Church, and acted as K. Johnson's enforcer of rules and expectations. R. Donauer was also head of the ushers at the Church, and worked directly under C. Randall and J. Randall in the operation of the children's church.
- o) Francis Thevenot ("F. Thevenot") was my coach for the girls' volleyball team at CCA.
- p) Kevin MacMillan ("K. MacMillan") was the music director at CCA and eventually became an elder in the Church during the time that I attended CCA and the Church.
- q) Anne MacMillan ("A. MacMillan") alongside her husband became an elder in the Church during the time that I attended CCA and the Church.
- r) Dawn Beaudry ("**D. Beaudry**") was a teacher at CCA and acted as my "monitor" when I was in Level 7, which is the equivalent of grades 11 and 12.
- 23. My parents have advised me, and I verily believe it to be true, that my parents were residing in British Columbia in 1984, when they decided to move to Saskatoon with a large group of other couples as a close-knit community. My parents did not have any family or friends in Saskatoon other than the community that they moved with. Not long after moving to Saskatoon, their community was fractured by various disagreements and my parents began

- looking for other communities to join. This led them to become members of the Church in approximately 1984.
- 24. As aforementioned, I began attending the Church with my parents after I was born 1988 and I was enrolled in kindergarten at CCA in 1993.

The Culture at CCA and the Church: "The Legacy Way"

- 25. K. Johnson was the head pastor of the Church throughout my entire time attending CCA and the Church, and he was the head of the entire organization. All of the staff at both the Church and CCA were expected to report directly or indirectly to him. He referred to himself as the "man of God", who was responsible for leading the members by hearing directly from God on their behalf. K. Johnson was considered the final authority on all decisions and directions that were carried out in both the Church and CCA.
- 26. Discipline in the form of ritualistic physical abuse was used to control students at CCA and minor congregants of the Church. K. Johnson describes the specific ritual of "scriptural discipline" in the Child Training Seminar Manual (the "Manual"), a book he authored. K. Johnson required all staff, congregants of the Church, and parents that had children attending CCA, to purchase his Manual and train their children in accordance with it. A copy of the Manual is attached to Catilin's Affidavit as Exhibit "F". The expectation was that the staff at CCA and/or the Church would train all children in accordance with the Manual while they were on the premises, and parents would continue to train their children in accordance with the Manual off the premises. The Manual was the absolute authority on how to "train" your child.
- 27. On page 81 of the Manual, K. Johnson writes:

The order of the ritual should be as follows:

 Somewhere in private, talk sternly and deliberately without a display of temper, and let him know exactly what he has done wrong.

- Require of him to state to you what he has done wrong so that the wrong is clearly recognized. (to learn responsibility for his actions)
- iii. Ask him what punishment is.
- iv. Explain that as God's representative, you are obeying God in administering discipline.
- v. Read Eph. 6:1-4. If he is able, have him read it.

Review the benefits of obedience:

- i. He'll have wisdom.
- ii. He'll be happy.
- iii. He'll be Healthy.
- iv. He'll have a long life.
- v. He'll be successful.
- vi. He'll be a good Christian.
- vii. He'll make his parents happy.

Explain that you are disciplining him because you want the best for him, because you love him.

Prov. 13:24

Have him bend over and apply the paddle firmly. Don't permit any wiggling around or jumping around. Don't allow any prediscipline howling and snivelling. Don't let his crying and begging diminish the degree of severity of punishment.

Always pray and offer some closing remarks of assurance at the end. ...

28. I recall L. Brunelle, a principal at CCA, following the discipline ritual K. Johnson describes in his Manual. Specifically, I recall being asked to state why I was in his office and what I had done wrong, and to describe the punishment, which was usually three "swats" on the

buttocks with a wooden paddle shaped like an oar. I was then instructed to bend over with my hands placed on the desk or the back of a chair for administration of the "discipline," which consisted of being hit hard by L. Brunelle with the wooden paddle on the buttocks area three times in a row. After administration of the discipline, a child would be expected to stop crying and sit still for a prayer, and often a physical embrace by the disciplining adult. The child would be told that they are loved and forgiven, and then were directed to return to class.

- 29. Corporal punishment was deeply embedded in the culture of CCA and at the core of how the staff were expected to address their students. Corporal punishment was referred to as "scriptural discipline". The core philosophy at CCA was to 'break the child's will'. Whether it was academic performance falling short of their expectations, displaying signs of a learning disability, identifying as a member of the LGBTQ2SA+ community (or being perceived as such), or repeatedly violating minor rules, I commonly observed the response from the CCA staff being physical discipline administered with a paddle by male staff members.
- 30. K. Johnson was aware of how effective this ritualistic physical abuse, or the threat of the same, was at controlling children by instilling them with fear. He acknowledges this on page 78 of the Manual where he writes "An undisciplined child is unteachable, repulsive, rebellious and foolish. If we didn't have discipline at our Academy, we wouldn't be able to control our students at all". This is further illustrated in the Manual on pages 79-80, under the heading "5. Spanking should be a ritual", where K. Johnson writes "It should be a ritual dreaded by the child. (Dread means to anticipate pain and trouble). He should not only dread the pain, but also the time consumed by the ordeal."
- 31. Religious doctrine was utilized to justify this ritualistic physical abuse, by using quotes from the bible. This is illustrated by the various bible scriptures listed throughout the entire Manual. The passage from the Manual that is quoted at paragraph 26 herein provides an example of this, whereby Proverbs 13:24 is cited directly before describing how to paddle one's child. Proverbs 13:24 says, "whoever spares the rod hates their children, but the one who loves their children is careful to discipline." K. Johnson frequently stated, "spare the rod, spoil the child," and often quoted Proverbs 22:6, "train up a child in the way he should

- go: and when he is old, he will not depart from it." This was his promise to parents that if they disciplined their kids in this way, it would guarantee their future.
- 32. I, and everyone attending the Church and CCA, were constantly reminded of these policies and rules in sermons delivered at the Church by K. Johnson, and by the staff at the Church and CCA. In addition, every student that was enrolled in CCA was required to complete a Student Application Package which further reinforced these expectations, rules and policies. Attached as **Exhibit "A"** to this Affidavit is a copy of my Student Application Package which includes the Student Statement of Cooperation, Parental Statement of Cooperation, Scriptural Discipline Form and Parent Commitment Form.
- 33. Various classmates, friends, and my siblings have since confided in me about being paddled for all kinds of reasons, and I verily believe it to be true. These reasons include, but are not limited to, speaking out of turn, talking back, talking about "ungodly things" like movies, TV shows, "secular" music, etc., or questioning authority. Students and/or congregants of the Church were taught not to have an opinion, not to engage in critical thinking, and not to engage with the emotional and/or pleasurable parts of life.
- 34. Physical punishments at CCA and/or the Church were not limited to being beaten with a wooden paddle. The staff and leadership at CCA would often subject students to intense "exercise" as a form of punishment. For example, I recall students being directed to do "towels", which required the student to push two-by-four boards that were wrapped in towels from one end of a full-sized gymnasium to the other, going back and forth multiple times. Sometimes the student would be required to push the towel wrapped boards in a specific pattern following various lines on the gymnasium floor.
- 35. Students were also punished by being directed to "run lines", whereby the student was required to run back and forth touching various lines on the floor of the gymnasium. Sometimes the staff would tell the student how many "sets" of lines they had to run before they could stop, though other times the student would simply have to run until they were told they could stop. Similarly, student were also forced to run laps around the soccer field outside until the staff administering the punishment would allow the student to stop.

- 36. As another example, students were forced to lean against a wall in a seated position with their knees bent at a 90-degree angle, sometimes holding a heavy object such as a medicine ball in their hands on top of their bent legs. Students were expected to hold that position until the staff administering the punishment allowed them to stop. If the student faltered, they would often be required to sit for a longer period of time as an additional punishment for faltering. I recall this occurring to a classmate when we were in the range of 10 to 13 years old.
- 37. As a few more examples, students were forced to run up and down flights of stairs until the staff administering the punishment permitted them to stop. Students were also forced to do burpees, which required the student to bend down (placing their hands on the ground), jump out into a prone plank position, then bring their legs back under their hips and jump into the air. The student would be expected to repeat this motion over and over again until the staff administering the punishment permitted them to stop.
- 38. Throughout my attendance at CCA, I noticed that the consequences for perceived inappropriate behaviour were inconsistent and varied from one student to another. For example, one student would get paddled for something another student would only receive a demerit (paper slip) for. Demerits were handed out for any number of reasons, including, but not limited to the following:
 - a) According to the 1982 CCA Policy Handbook, a copy of which is attached as Exhibit "J" to Caitlin's Affidavit:
 - a. Turning around in office;
 - b. Left pen out at Scoring Table;
 - c. Disturbance in Music;
 - d. Not working in office;
 - e. Flag violation;
 - f. Vocabulary not said;
 - g. Running;

Goals set improperly; Failed check up; k. Disturbance in Chapel; Score Key Violation; m. Messy Office; n. Out of Seat; o. P.E. Dress Code; p. HW, OOPS, DET. Slips & BR., ENV. Not signed or returned; Restroom; Disturbance in Learning Centre; Tardy – 3 Demerits; Left chair out; u. Talking without permission; v. Reading without permission; w. Unfinished PACEs; x. Not abiding by the dress code (P.E., Learning Centre or hair) b) According to the 2006 CCA Policy Handbook, a copy of which is attached as Exhibit "K" to Caitlin's Affidavit: a. Wasting Time i. Turning around in office

h. Attitude or Disobedience;

playing in office, doodling, etc.)

ii. Not working (includes turning around in office, daydreaming,

iii. Late in the morning, or late from breaks

b. Disorderly

This category will be handled with other methods, such as: messy
office – scrub during break, cube – practice putting up and down ten
times, etc.

c. Irresponsible

- i. Forgotten envelope or PACE
- ii. Not listening to or following specific instructions
- iii. Completed PACE or PACE Test not turned in to teacher for scoring
- iv. Minor uniform infractions, including gym clothes not at school

d. Unproductive

- i. Goals not set or crossed off properly
- ii. Not following the "Order of the day" (set goals, PACE tests, Self-Tests, homework, today's goals)
- iii. Incomplete goals (homework not done, vocabulary not completed)
- iv. Not following procedures (check-up, or self-test not initialed, no mark on check-up)

e. Doing your own thing

- i. Chewing gum
- ii. Off limits (touching teacher's desk, out of seat without permission, leaving class without permission)
- iii. Improper conversation (about movies or other inappropriate topic)
- iv. Talking without permission

v. Poor self control (includes wrestling, teasing, crying, yelling, and other classroom disturbances)

f. Careless

- i. Going too fast in hallways
- ii. Careless scoring (includes not seeing a mistake, forgetting to circle the page number, or circle an X)
- iii. Careless work

g. Supervision

- Covers all infractions taking place on break, lunch, before and after school.
- 39. The leadership and staff at CCA and the Church also used various forms of psychological abuse to control and manipulate students at CCA and congregants of the Church.
- The threat of going to hell for certain behaviours or for not being obedient "at all times" was 40. used to scare students into complying and being obedient from an early age. We were taught from infancy in the Church, and subsequently from kindergarten to grade 12 at CCA, how absolute obedience to God's will, which was represented by the will of K. Johnson, and those who reported to him, was the only thing that kept us safe from the devil's attacks and influence. Disobedience meant that we were no longer protected under what was termed the "umbrella of protection". Attached as Exhibit "B" to this Affidavit is a copy of the diagram entitled, "The Rigid Concept of the Umbrella of Protection in Family Relationships". We were repeatedly told that without that protection, bad things could happen. This included anything from sickness, literal attacks or crimes committed against you, "accidents," or any form of unwanted outcome including an unexpected death. We were told that continued disobedience without repentance meant you would be sent to hell, or miss the rapture and be left behind on earth without your family, friends, community, church, etc. These messages were pervasive throughout every aspect of our experience at CCA, the Church and at home. They were relayed through sermons; interspersed in our learning materials for all school subjects (e.g., Math, Science, Literature); daily bible study sessions at school (called

- "devotions"); permitted Christian media such as books, music, and movies (e.g., the Left Behind series); and even on large bulletin boards in the classrooms and hallways.
- 41. It was preached that sickness was akin to sin, and it was a failure of your own faith if you could not overcome sickness without medical intervention. It was not uncommon for individuals to be called up or mentioned during church services to be prayed over for their ailments, or perceived ailments.
- 42. The fear of being shunned and "cut off" was also used to control students at CCA and congregants of the Church. K. Johnson would regularly reiterate how no one was "trapped" in CCA or the Church and that there was "panic hardware on all of the doors," meaning members could leave at any time if we wanted. However, we were also repeatedly told that leaving carried the threat of stepping out of the will of God and out from under this umbrella of protection.
- 43. Further, K. Johnson would often disparage families or individuals that left the Church and/or CCA when delivering his sermons, whereby he would chastise, criticize and berate the individual(s) and direct the members of the Church to have no further communication with the individual(s). Therefore, leaving the Church and/or CCA essentially meant complete severance from and shunning by those still attending the Church and CCA. We were also instructed not to talk to or engage with any student or family that left the school, thus prohibiting us from building a community outside of the Church and/or CCA. Consequently, we were extremely fearful of the consequences of leaving and/or being exiled from the Church and CCA because of this isolation from the outside world.
- 44. Students at CCA, including me, were constantly monitored and evaluated on all aspects of our lives, both inside and outside of the Church and CCA. For example, sometime in 2002, CCA introduced the Total Development Strategy ("TDS") as a required form of student evaluation. We were told that the purpose of the TDS was to assist families in the training and development of their children, with the goal of helping teenagers develop the spiritual passion, character, and skills each one will need to fulfill God's plan for their future. These meetings replaced traditional parent-teacher interviews for the high school students. The meetings involved the student, their parent(s), a representative from CCA, and a representative from the Church. Prior to meeting, each of these individuals (including the

student) completed specific evaluation forms on six areas of "development," (detailed below). The group then met to discuss their evaluations with the student directly. The evaluation forms consisted of scoring the student on a scale of 0 (worst) to 10 (best). Students were graded on the following areas:

- 1. Spiritual Growth (spiritual passion)
 - Active and meaningful praise and worship
 - Word level
 - Prayer life
- 2. Social Life
 - Positive, Godly influence
 - Appropriate, modest dress
 - Healthy peer relationships
- 3. Academic
 - QPC up-to-date
 - Good work habits
 - Graduation projections on target
- 4. Personal Development
 - Respect for authority
 - Response to correction and discipline
 - teachability
- 5. Gifting Development
 - Appropriate participation in athletics/music/drama
 - Overall schedule
 - Serving in other departments

6. Family Life

- Relationship with parents
- Effect of student's schedule on home life
- Home routines
- 45. These TDS evaluations are in accordance with the fact that CCA and the Church monitored and controlled every aspect of our daily lives. Copies of various TDS evaluation forms that were completed to evaluate Caitlin Erickson are attached as Exhibit "Q" to Caitlin's Affidavit. I recall feeling extremely anxious when the TDS evaluations were introduced and I wrote in my journal about choosing to end my life, stating "I am very scared about the character evaluation thing. I don't want to be yelled at by Pastor or someone scary like that."
- 46. The leadership and staff at CCA and/or the Church constantly demanded that we meet the standard of "excellence" at all times, and in all areas of our lives. Given the numerous rules and expectations that students were expected to comply with at CCA, it was essentially impossible to meet the standard of perfection that the leadership demanded. Constantly being monitored, with this unattainable level of perfection in mind, caused me to be hypervigilant and left me feeling like I could be called out at any moment for perceived wrongdoings.
- 47. Students at CCA were used against each other to enforce the rules and the culture of fear at CCA and the Church. For example, students were encouraged and expected to report on any perceived wrongdoings of other students to the staff and/or leadership at CCA. If you were aware of someone else's wrongdoing, and did not report it, you were at risk of being punished. At the same time, if you did report another student, you were still at risk of being punished due to being "guilty by association", a term used regularly by J. Olubobokun. As students, we lived with the paralyzing fear of punishment: either for reporting, or not reporting, another student. Further, if we did report a student, we also lived with the knowledge that we were responsible for the punishment of our peer. This led to significant distrust and suspicion within the small student body, making the formation of healthy, trusting, and respectful relationships nearly impossible with our peers. This also allowed the leadership and staff at CCA and the Church to extend their surveillance of the students beyond their physical presence. This constant surveillance meant we had no sense of privacy.

We had no ability to "let down our guard" even when we were not in the school or church environment.

- As another example, CCA completed "PACE checks" at least once during the school year. As described later in this Affidavit, students were required to complete their schoolwork independently in their separate cubicles, and then grade their own work based on a score key at a station in the centre of the room. At least once a year, the staff would select a portion of each student's independently graded work, and hand it out to other students so they could rescore the work of their peer. Varying degrees of punishment were inflicted upon students if errors were found in their PACEs. The severity of the punishment increased with the number of mistakes found. There were usually details in the PACE that revealed the student's identity, so there was virtually no anonymity. If we found mistakes in another student's PACEs, we knew that we were the indirect cause for that student having to endure a punishment. This caused bitterness between students at times.
- 49. Although the leadership at CCA and the Church encouraged students to report any and all wrongdoings they were aware of, the leadership also preached that a child's perspective on any issue was subjective and immature, and not worthy of belief. The leadership at CCA and the Church routinely cast suspicion on the believability of us as students and minor congregants of the Church, as a means to maintain complete control over the narrative. This is supported by the 2006 CCA Policy Handbook, a copy of which attached as Exhibit "K" to Caitlin's Affidavit, which includes the following warning on a child's version of events on page 15-b:

One of the communication issues that we must be aware of is "slanted news." This refers to the subjective, limited perspective each student has on personal issues and school life in general. It is crucial that parents keep this in mind when dealing with student information. If we accept as total and accurate each student account, we will often miss important details. We are not implying that young people are devious and deceptive, but it is a fact that their immaturity and limited understanding will lead them to inaccurate conclusions. People hear as they are, through their own understanding, and

through their own experiences. Students are no different. They are only capable of repeating what they have heard, as they have heard it — which may or may not be consistent with what was intended. We give parents this same respect and consideration with news that comes from the home to school.

If information brought home seems inconsistent with known school philosophy or policy, we urge parents to check it out with the appropriate staff immediately. This may alleviate unnecessary concerns, help correct student perspectives, or assist staff in straightening out oversights. The devil always preys on the uninformed. Close parent/school communication will prevent this.

- 50. The leadership and staff at CCA and/or the Church constantly criticized our clothing. Despite being required to purchase and wear a specific uniform, we were continuously being monitored and criticized on the fit of the uniform and whether it was too tight. This was especially difficult if you were curvy girl in adolescence, as I was, and had parents who could not afford to keep buying me new uniforms. We were constantly being evaluated on our physical appearance; for example, we were assessed daily as to how our clothes fit, if we were wearing the right combination on the right day, whether our shoes had buckles and one or two inch heels, if we were wearing pantyhose underneath, if any piece of clothing fit in a way that might show the curve of a breast or buttocks, etc.
- 51. Further, students at CCA and minor congregants of the Church were told that we were not allowed to wear graphic t-shirts because the messaging was considered secular and, for females, due to the attention it would draw to our chests as girls. We were told to place a hand over the top of our shirt any time we bent over to ensure that our shirt did not gape open. We were expected to pull the back of our shirt down every time we stood up or moved to make sure that we did not expose any skin. Female students and/or minor congregants of the Church had to buy clothing that was several sizes larger than our actual fit in order to meet the strict clothing guidelines, which stipulated that shirts could be no lower than three fingerbreadths from the collarbone and that sleeveless tops, if ever worn, had to have straps that were three fingers across.

- 52. A. Johnson (née MacMillan) was a volunteer staff member in the youth ministry at the Church. I recall A. Johnson criticizing my clothing as a young girl. I had hips and a substantial figure, and I was reminded of this by A. Johnson. A. Johnson sent me home twice to change my pants when I was supposed to be leading the music portion of a youth service when I was in grade 11 or 12. I was told on both occasions that I had to change my pants because were too tight across my buttocks, but I only had two pairs of dress pants to choose from, and the dress code required that I wear dress pants for services. I was publicly humiliated over something that was out of my control.
- 53. K. Schultz would regularly disparage students for various reasons, including but not limited to, their attitudes, clothing, and behaviours. I recall attending an assembly at CCA that was meant for female students, and I recall K. Schultz telling us how ridiculous "young girls" were for "squeezing themselves into their jeans like sausages", and how "if the barn needs painting, then you'd better paint it." He would make jokes such as "I may be fat, but you're ugly, and I can diet!" to the student body. I recall K. Schultz telling the all-female volleyball team, including myself, that we looked stupid while we played and then proceeding to make fun of us by imitating the way that we would laugh when we felt embarrassed. I internalized this shame around my appearance and certain aspects of my body, and I still actively have to work through body dysmorphia as a result.
- 54. Female students at CCA and minor congregants of the Church were also consistently indoctrinated with purity culture. Purity culture is a movement within certain Christian communities that emphasizes sexual abstinence before marriage, promotes courtship over casual dating, and encourages modesty in women's attire to prevent arousing sexual urges in men. Within this framework, men are expected to be strong leaders, while women are seen as supporters, responsible for maintaining not only their own purity but also helping men avoid impure thoughts or actions. A woman's worth was equated to her sexual purity and we were shamed for being "sexy" and causing boys to "stumble" by having "impure thoughts" if we ever did not meet the standards of modesty listed in 51. We were taught that sex was for marriage alone and understood that it was a woman's sacrifice to please a man. CCA and/or the Church did not provide us with any sex education, and the topics of safe sex and consent were never discussed.

- 55. In addition to the other rules and expectations that female students had to live up to, we were also precluded from playing sports or doing activities that were considered "masculine". I recall N. Rysavy not allowing the female students in his class to play football or hockey at recess because they were "not sports that should be played by females".
- 56. Students, and in particular, female students, often received poor career and life advice from the staff at CCA and/or the Church. I recall D. Friesen, J. Olubobokun, K. Schultz and E. Schultz providing poor advice and trying to condition students with respect to their future plans. I was often reminded that as a female, my destiny was to get married and have kids, so there was no need or benefit to me spending any time thinking about or planning to attend university and/or pursue a career. When I received a Greystone Scholarship at the University of Saskatchewan in Grade 12, I turned it down based on these beliefs. After leaving the church, I had to fund my own way through university as I no longer had access to these scholarships.
- 57. In addition to telling females that they were not destined for university and/or pursuing a career, all students at CCA and/or congregants of the Church were taught that university was considered a "liberal, humanistic place" where we would be exposed to the dangerous ideas and the mindsets of liberals. The leadership and staff at CCA and/or the Church discouraged students from attending post-secondary education that was not affiliated with the Church.
- 58. For the years I attended, CCA was funded by donations from members of the Church and tuition payments collected from the families of enrolled students.
- 59. The leadership at CCA and the Church would employ psychological tactics, such as instilling fear and public humiliation, to enable the financial abuse of everyone that attended CCA and/or the Church. Students at CCA and congregants of the Church were constantly pressured to fund the Church and CCA, and the lavish spending of those in power, which was mainly K. Johnson, the head pastor. Members were subjected to intense pressure to financially support the CCA, the Church and its leadership, regardless of their precarious financial situations at home. I recall special offerings to obtain K. Johnson a large house in the countryside, and later for a brand-new luxury vehicle. During sermons, sometimes teenaged/young adult men would be asked to take K. Johnson's Lexus to the car wash and detail the interior during the service, at the expense of the church. At one point, the main

- office of the church had a Starbucks coffee card that they would pre-load every month in the range of 300-350 dollars specifically to fund K. Johnson's coffee habit.
- 60. From the very beginning, congregants of the Church were taught about the importance of "tithing," which was the act of giving ten percent of any income earned. The expectations surrounding tithing applied to children just as much as adults, and income, for the purposes of tithing, included all monies received by the individual. Aside from traditional employment income, this included money that was gifted to you, and any money earned by doing chores or small jobs like delivering newspapers or babysitting.
- 61. In addition to tithing, congregants were also expected to provide "offerings" to the Church, which was additional money donated in addition to the regular tithing.
- I began attending the children's nursery in the Church as an infant, and the expectations that I give tithes and offerings began at one year old. Since the nursery in the Church was broken down by age, parents like mine who had four kids, all two years apart, would have to make sure that each of us had money to provide for our separate offerings in the nurseries. Giving in offerings started when children were one year old and continued in youth ministry up to age 18. In addition to providing money to their children for tithes and offerings in the nursery, parents were also expected to provide their own tithing and offerings in the main church services for the adults, sometimes two or three offerings.
- 63. At the beginning of every service at the Church, K. Johnson, or one of the elders or leaders of the Church, would give a short teaching called the "offering message" prior to the main message being delivered. During my time at CCA and the Church, the elders included K. Schultz, J. Power, J. Olubobokun, J. Randall, K. MacMillan, and J. Thuringer. The offering message would involve using biblical passages to support the idea of giving tithes on gross income, and offerings in addition to tithing. One passage that was regularly quoted to congregants of the Church was the following:

⁷Even from the days of your fathers ye are gone away from mine ordinances, and have not kept them. Return unto me, and I will return unto you, saith the Lord of hosts. But ye said, Wherein shall we return? ⁸Will a man rob God? Yet ye have robbed me. But ye say, Wherein have we robbed thee? In tithes and offerings. ⁹Ye

are cursed with a curse: for ye have robbed me, even this whole nation. ¹⁰Bring ye all the tithes into the storehouse, that there may be meat in mine house, and prove me now herewith, saith the Lord of hosts, if I will not open you the windows of heaven and pour you out a blessing, that there shall not be room enough to receive it." (Malachi 3:7–10, KJV)

- 64. These speakers interpreted the passage above for the congregants of the Church, stating that the Church as an entity represented the storehouse, and that we were robbing God if we did not bring tithes and offerings into this "storehouse." Further, we would be cursed with a curse if we did rob God in this way, and miss out on such a great "blessing, that there shall not be room enough to receive it." In this way, the speakers used biblical passages either to guilt and shame congregants, or to encourage and celebrate the act of giving, in order to manipulate congregants by making them feel compelled to give in the offering. Congregants of the Church were taught that the act of tithing and offerings were linked to morality and were evidence of a person's commitment to their Christianity. K. Johnson monitored the tithes and who gave how much, and would at times make statements from the pulpit indicating that he knew who was tithing and who was not, while also making it clear how unacceptable and "unchristlike" it was not to tithe.
- 65. As an added measure of intimidation and monitoring, the Church had buckets (similar to KFC buckets) that the ushers would set out at the front of the Church along the stage after the "offering message." A song would be played by the Church band while congregants walked down the aisles in a single line fashion to place an envelope with money or a cheque in it for the offering. This made it glaringly obvious who was not providing an offering. K. Johnson and the elders all sat in the front pews of the church. During the offering, they would often turn around and observe who was still standing in the pews. As a child and adolescent, I would often walk up and put an empty envelope in the bucket just so I could avoid the intimidating stares and psychological pressure I would receive from K. Johnson and other leaders if I remained standing in the pews.
- 66. I understand that many of the congregants felt they had to provide empty envelopes or fake offerings due to the psychological pressure put on them by K. Johnson. I recall that at one point, R. Donauer stood up at the front of the Church and made an announcement to all

- congregants, asking us not to put empty envelopes in the offering bucket because it was a waste of envelopes. R. Donauer was K. Johnson's enforcer and head of the ushers at the time.
- 67. When I started making my own money through babysitting, I remember wrestling with the idea of tithing and feeling terrified of the curse that would come upon me if I did not tithe. At the same time, I also hated the fact that I had to give up ten percent plus additional offering money out of the very little cash that I had earned and/or been gifted. Later, when I began earning an income working various part time jobs and then later for the Government of Canada, I gave so much money to the Church that I was audited by the Canada Revenue Agency ("CRA"). The CRA wanted proof that I, an 18-year-old, was actually giving thousands of dollars a year to the Church. I was programmed to give to the Church and was regularly convinced to give more during the offering messages and/or during "special offerings", which would occur on a regular basis. I did not feel free to spend my money on something for myself like a regular teenager might have, nor was I able to invest or save my money to go towards my future and post-secondary costs.
- On top of this immense pressure to tithe and give offerings, my parents had to pay tuition 68. for their four children to be in school at CCA. My mother advised, and I verily believe it to be true, that this amounted to \$750 a month in the 90s, which amounted to more than their monthly mortgage payment at the time. On top of paying tuition, students and parents were also required to go out into the public and raise money for the "assessment." The assessment was an amount of money calculated twice a year. Since we worked independently as students on individual units of curriculum (called PACEs), we completed them at varying rates, and so the number of PACEs completed per year per student also varied. The assessment twice a year calculated the exact amount due for the number of PACEs completed by each individual student for each family. So, in addition to the yearly tuition cost, this assessment/payment was also required. For families such as mine who could not afford to pay the assessment, we would fundraise. For example, I recall going door-to-door selling chocolates and citrus, or simply asking for donations to raise the necessary funds to pay these additional costs. Instead of spending my childhood evenings involved in fun extracurricular activities like sports or music lessons, my main memories are going door-to-door asking for money from strangers

- with my parents, my friend's parents, or sometimes single or married couple volunteers from the Church. I remember one time my sister and I were taken out by a married couple who wanted to take us specifically because we were "so cute", which usually meant it was easier to get donations out of people.
- 69. The leadership at the Church and/or CCA also expected us as students, beginning at age 13, to start volunteering in the childcare departments, and would expect us to honor these commitments regardless of how little free time we had. For example, page 3 of the TDS handbook for formally evaluating students in junior high and high school (a process described earlier in this Affidavit), provides the following statement regarding a student's schedule: "We will always defer to what is best for the student when over-scheduling has become detrimental, although as a rule we must consider our commitments to church departments and their operation, and evaluate what is best for "us all."... There are times when it is appropriate to do what is best for "the team" instead of what might seem best for an individual in the short term". Attached hereto as **Exhibit "C"** are photos of the first five pages of the TDS Handbook, which introduced the TDS evaluation mandate. This meant that as students, if we became over-committed in our activities at CCA and the Church, there was no real option to drop out or cut down our expected contribution of childcare during church services, which was at least 4-5 times per month.
- 70. In addition to providing childcare, students and/or minor congregants were also expected to prepare short "messages" or sermons for the childcare during church services, or organize games or skits, or lead the music during these sessions. I volunteered in childcare from age 13 until age 20 when I eventually left the Church. This meant that not only did actual church services, which were four to five times a week, distract from my ability to develop normally as a kid and an adolescent, such as engaging in extracurricular activities, but I also had to spend a lot of time prior to those services being responsible for childcare and preparing for whatever I had been assigned (a sermon, game, skit, or music).

Specific Instances of Abuse

71. Throughout my years at CCA, I recall seeing other students leaving the office or entering the classroom with reddened faces or still sniffling from crying. During my years in the upper levels (equivalent to grades 7-12) at CCA, I recall hearing the screaming and crying of other

- students from being paddled in both J. Olubobokun and D. Friesen's offices. Their offices were down the hall from the upper-level classrooms on the second floor, in the same building as the Church.
- 72. I recall witnessing a fellow student, Robynne Randall, constantly being summoned to the principal's office to get paddled for "cheating". She would confide in me from time to time about the same, and I verily believe it to be true.
- 73. During my early years at CCA, K. Schultz was the director of CCA and L. Brunelle was the principal of the CCA. When I was in the equivalent of grade I or 2, I recall being sent to the principal's office to be "disciplined," although I do not recall a specific date or cause. I recall being asked to state why I was in the office and what I had done wrong, and to describe the punishment, which was usually three "swats" on the buttocks with a wooden paddle shaped like an oar. I was then instructed to bend over with my hands placed on the desk or the back of a chair for administration of the "discipline," which consisted of being hit hard by L. Brunelle with the wooden paddle on the buttocks area three times in a row.
- 74. Being physically punished was an extremely effective deterrent for me, and I quickly became compliant and terrified of making a mistake. I only had to experience this ritualistic physical abuse a few times before I became terrified to do anything that might lead to a paddling. I became obsessed with avoiding being paddled which led to me being hypervigilant, anxious about making mistakes or making the wrong decision, and obsessed with pleasing the adults in my life above anything else.
- 75. On or about Sunday, February 11, 2001, I recall an incident where R. Donauer threatened to paddle all of us children in children's church (i.e., Sunday school) if we did not "praise the lord" more effusively, for example, by raising our hands, jumping up and down, singing louder, and essentially looking "into it." I recall R. Donauer's face turning red because he was so angry and him saying that he would not hesitate to paddle every one of us if he had to. R. Donauer was "nice" until he was not; he would become enraged, threaten physical abuse, and/or use his size and yelling to intimidate us kids. R. Donauer's unpredictability instilled us with fear and that was how he controlled the children in the children's church sessions. R. Donauer was K. Johnson's enforcer and worked directly under J. Randall and C. Randall to run the children's "ministry" at the time, as they called it. I have a diary entry

- from February 12, 2001, which describes this incident. Attached hereto as **Exhibit "D"** to this Affidavit is a true copy of this journal entry from February 12, 2001.
- 76. My most vivid memory of being paddled at CCA occurred when I was fifteen years old and in grade 10. At the time, J. Olubobokun was the director of CCA and D. Friesen was the principal.
- 77. On a date between October 1 and November 30, 2003, I had spent the weekend playing in a volleyball tournament on the CCA volleyball team, and the team was required to attend the Saturday night church service after the tournament was over. The entire team arrived late, so we were sitting in the balcony of the auditorium. During the sermon by a guest speaker, we were whispering to one another. The following week, the volleyball team was summoned into the Church auditorium. J. Olubobokun, the school director and elder in the Church at that time, came into the auditorium, sat on the edge of the stage drumming his fingers against the stage, and glared at all of us silently. We did not know what was going on. J. Olubobokun then began berating us, yelling at us for talking during church, disrespecting the guest speaker and the head pastor, and in essence, making the school look bad in front of the guest speaker. J. Olubobokun announced that the entire team was going to be paddled that morning, and we were then all lined up in a row along the front of the auditorium. We were instructed to pray loudly while we waited for our punishment.
- 78. D. Friesen and J. Olubobokun went into a boardroom that was accessed through a door from the side of the stage of the auditorium, and one by one, we were called into the boardroom to be paddled. Each girl walked in, put her hands on the boardroom table and received three hard paddles to the rear end with an oar-shaped wooden paddle. Our volleyball coach, F. Thevenot, stood in the auditorium with us. Halfway through the paddling, she was asked to enter the boardroom and observe. Since I was further down the line, I had to wait in line crying and listening to the other girls get hit and sobbing ahead of me. Later that week we compared our bruises from the paddling, and I recall one of my team members making a joke that she voted in the provincial election and got paddled all in the same week. This entire incident was terrifying, humiliating and traumatic, and my vivid memories of this incident still haunt me today.

- 79. N. Rysavy was a male teacher at CCA that was responsible for Level 5 students (the equivalent of grades 6 to 8). I recall N. Rysavy, in his role as a teacher, massaging the shoulders of his female students, me included, and playing with our hair by twisting and twirling it in his hands. He would also stand behind me, place his hand on the desk next to me, and lean down towards me so that our faces were close to each other. I recall N. Rysavy making these kinds of gestures that had sexual undertones while we were asking for academic help, and other times where he was simply standing nearby us. I remember N. Rysavy doing this to me and other girls in the class regularly, which was multiple times a week when I was in his classroom.
- 80. I recall feeling uncomfortable but also confused by N. Rysavy's behaviour towards me. I felt deprived of the unconditional love and acceptance that children typically received from their parents, and this caused me to have mixed emotions about N. Rysavy's treatment towards me as I longed for the attention I was receiving, but felt uncomfortable by the fact that he was the person I was receiving it from. The fact that this inappropriate touching was normalized added to my confusion. I remember that Arwen Thibeault (née Thompson) was the class monitor for N. Rysavy's class when I was in it, and she watched N. Rysavy do this to us female students everyday as N. Rysavy did not try to hide it. I did not realize how inappropriate N. Rysavy's actions were until I left the Church as an adult, and reflected on how I would feel if my 12- or 13-year-old daughter was being touched this way by her teacher nearly every day.
- 81. When I was approximately 12 or 13 years old, I recall Catilin Erickson warning me about N. Schultz and telling me to avoid him. I recall getting into trouble for talking about same. As mentioned earlier, I volunteered in the Church's childcare department when I was approximately 12 or 13 years old, and I recall it being made known that the male staff were no longer allowed to escort children to the bathroom during children's church.
- 82. When I was 13 years old, I began to cope by completely dissociating from certain aspects of reality. The only way I could handle the extreme cognitive dissonance was to ignore all the inconsistencies that existed between what I was taught and what I witnessed. For example, we were told to love one another but then had to watch our friends and siblings being physically abused on a regular basis by the very same adults that were telling us to love one

- another. K. Schultz, as the director of CCA at the time, heavily encouraged me to become someone who was "on fire for God." If you were someone who was "on fire for God", you did not use your brain to think, but instead, you let God and the man of God, which was K. Johnson and the Church elders, tell you what to think and how to act. We were taught that being "on fire for God" represented our level of commitment, devotion, and "passion" for God. I wrote a journal entry on October 20, 2001, as the date and time that I decided to become a "possession of God's." Attached hereto as **Exhibit "E"** to this Affidavit is a true copy of my journal entry from October 20, 2001. The majority of my journal entries from this point forward consist only of prayers and religious babble.
- 83. After this date, I started reading the Bible obsessively, shutting myself out from the rest of my family, and isolating myself from friends because they were considered "less spiritual." I began receiving a lot of positive reinforcement for my behaviour from the leadership at CCA and the Church and I viewed the same as validation that I was doing the right thing. I saw other students being treated badly and just accepted the explanation that we were always provided, which was that they deserved it because of their actions or because they were somehow "lesser than" as human beings. These were often individuals that came from "broken families," or individuals who exposed themselves to "ungodly influences," or who, by some arbitrary measure, did not have the same spiritual acumen as those "higher up" in the Church and/or CCA.
- 84. The Church and CCA reinforced this idea of spiritual hierarchy openly. For example, during my older brother's graduation ceremony for Grade 12 in 2002, held in the Church auditorium, K. Johnson asked two of the graduating students to come stand on stage while the remaining 14 students stayed in the audience. The graduates were sitting in the front two rows of the centre section of the auditorium. The two students who were brought on stage were described as the standard of purity, holiness, and character, as the ultimate examples of how to live and act for the rest of the students and minor congregants. After this, K. Johnson then named approximately half of the graduates who were still in the audience, telling them to stand and stating that they too were charactered. The rest of the graduating class, including my brother, were left sitting in their seats, shamed as not being worthy enough or charactered enough to be recognized like their peers. For me, this kind of public shaming was another

- effective method of deterring any deviation from the rules or questioning the methods and teaching of the Church and CCA.
- 85. The Church went through a time of "revival" where we would have chapel services during school hours that would run for a long time, starting in the morning and going into the afternoons on some days. I only got my schoolwork done because I had completely cut out everything else in my life except the bible and doing the things that pleased the leadership at CCA and the Church. My friends, who have since left the Church, reminisce about songs that they remember from bands they listened to, and I do not share these memories as I was listening to worship music. I completely lost any sense of self that I had, which was already seriously fragmented to begin with. Losing myself entirely was encouraged by the idea of "losing yourself" as explicitly taught by K. Schultz to students at CCA, as a way of demonstrating your dedication to Christ.
- 86. I remember my family seriously struggling to meet our basic needs due to the financial abuse that we all endured at CCA and the Church. As a kid I wanted to learn how to play a musical instrument, and how to play hockey and basketball. The reality was that my parents could not afford these lessons for me or any of my siblings. I believe this was in large part because of the financial burden that was placed on my parents as a result of having to pay tuition and assessment fees, repeatedly being expected to give offerings in addition to tithes, and providing all of us children with money to provide our own offerings.
- 87. In approximately the mid-1980s, my mom advised me, and I verily believe it to be true, that she donated her engagement ring to the Church because K. Johnson was pressuring members of the Church to take out personal loans to make substantial donations to the Church, and/or donate their property. K. Johnson alleged that he was requesting such substantial funds "to help keep the doors of the Church open", and thus members of the Church, including my mother, felt obligated to donate whatever they could.
- 88. When I was 13 years old, K. Johnson held a huge offering at the Church and advertised that the purpose of the offering was to pay off the mortgage for the Church. K. Johnson told us that he believed this was a directive from God, which meant that "people needed to heed to it". Congregants of the Church gave all kinds of money and pledges at the time, and I am advised by my parents, and verily believe it to be true, that my parents did as well. I am

advised by my parents, and verily believe it to be true, that my parents sold their home and began renting a downsized duplex so that they could have enough money to provide their pledge of \$10,000 to the Church. At a later annual general meeting for the Church corporation, it became apparent that the mortgage amount owing was still quite high, and we were told that the Church mortgage was never paid off. There was no indication of where this substantial offering money actually went.

- 89. I am advised by my father, and verily believe it to be true, that the Church offered my father a job in the Church as the facility director / maintenance as my father was struggling to find a job after his company closed. My father agreed to commence working for the Church for a very small salary, as J. Randall had promised that he would soon receive a raise. After working for the Church for some time, my father returned to J. Randall to request the raise he was promised as he was struggling to meet our basic expenses, and the response he received was "God will provide". I am advised by my father, and verily believe it to be true, that my father never received the raise he was promised in the approximately eight years he worked for the Church.
- 90. My mother was a teacher at CCA for 17 years. My mother advised me, and I verily believe it to be true, that she only received a very small salary for the years she worked at CCA. My mother advised me, and I verily believe it to be true, that she received a significantly smaller salary than her male counterparts, regardless of her experience and/or seniority, due to the fact that women were not considered to be primary breadwinners or the "head" of the household.
- 91. I remember feeling frustrated as an adolescent because it was hard to reconcile the fact that our family was seriously struggling financially due to the substantial donations we were repeatedly expected to make to the Church, while at the same time, we were receiving next to nothing in return for all of the work my family was doing at CCA and/or the Church. While our family was raising money to pay for a brand-new Lexus for K. Johnson, we were driving a 1986 Suburban that had a hole in the floor, a broken driver's side seatbelt, and was covered in rust. We were gifted a few used vehicles from an elder in the Church because we could never have afforded to buy one ourselves.

- 92. I remember driving to Kananaskis, Alberta, for a family vacation and we had to eat at the same restaurant (Humpty's) for every single meal on the way home as we had to rely on a points card to pay because CCA had accidentally withdrawn our tuition early and my parents did not have any savings to rely on.
- 93. I explain the above to demonstrate the detrimental and oppressive impact that K. Johnson's organizations, being CCA and the Church, have had on my wellbeing. Instead of taking lessons for a musical instrument, my family and I were raising money to buy a house and a new vehicle for the head pastor of our Church. Instead of experiencing a club sport as a child, my family and I were raising money to pay for tuition at a school that had a seriously deficient educational program and a leadership that abused, and promoted the abuse of, their students. During my later years at the CCA and the Church, instead of using my earnings as a teen and young adult to enrich my life or save for my future, I felt obligated to give thousands of dollars a year to uphold the same organizations that had abused me all of my life because I was conditioned, by K. Johnson and the elders, to believe that if I did not, my life would be cursed.
- 94. My parents were eventually asked to leave the Church and CCA around July or August of 2009, and not long after, my sister and brother-in-law, as he then was, were kicked out of the Church as well. My father was already working elsewhere, but my mother was pressured to quit. It was understood that she would have eventually been fired. She did not receive severance or letters of reference for future employment. My family being kicked out of the Church, and personally having begun to realize the moral corruptness of the entire organization, I finally decided to leave the Church in early October 2009.
- 95. I was immediately shunned by my friends and acquaintances that were members of the Church as soon as I left. I remember going to a nearby Safeway shortly after I had left the Church, and I was walking in one of the doors when I made eye contact with a member of the Church. I watched them turn on their heel and purposefully take a different exit to avoid me. I lost everything I had known for the first 21 years of my life. My parents advised, and I verily believe it to be true, that they were reeling from my mother losing her job at CCA and trying to find their new normal after having dedicated so much of their time and energy to the Church and/or CCA. My sister advised me, and I verily believe it to be true, that she

was dealing with significant depression after being kicked out of the Church and exiled from the community. One of my older brothers had left the Church years earlier and was living in a different city. We were told we could not stay in touch with him because he was living in sin as a member of the 2SLGBTQ+ community. We had lost contact with each other when he left years earlier. Our relationship has since been repaired. My oldest brother and his wife were still members of the Church, and this significantly strained our relationship to the point where I did not have any contact with them for several years.

The "ACE" Program

- 96. Aside from the mental, physical and sexual abuse I suffered at CCA and the Church, the education program itself at CCA was deficient and problematic in several ways.
- 97. The curriculum used at CCA was the Accelerated Christian Education Program ("ACE"). ACE is a complete, self-instructional curriculum, that integrates Bible truths and character values throughout all subjects and grade levels. Biblical principles and concepts are interwoven into all aspects of the program. Science is taught from the biblical perspective of creation. The curriculum consists mainly of Packets of Accelerated Christian Education ("PACEs") that are typically around 40 pages in length, each of which takes a student approximately 2 weeks to complete. Students completed these workbooks at desks or cubicles enclosed on 3 sides, known as "offices." Attached as Exhibit "W" to Caitlin's Affidavit is an article on the Accelerated Christian Education Program, from Routledge Taylor and Francis Group, published in the Journal of Curriculum Studies 2018.
- 98. The physical set up and structure of the classroom with individual cubicles did not allow for any interactions with other students. We were isolated. Attached as Exhibit "I" to Caitlin's Affidavit are photos of the setup of the classrooms at CCA, taken from various yearbooks.
- 99. I recall social isolation being used as a form of punishment, through forcing students to stay inside, working quietly at their desk while others enjoyed lunch and recess. Although this may seem like a smaller punishment, recess and lunch time was the very limited free time students had to talk or move their bodies. When we were in the classroom, students were expected to face forward towards the wall, sit still in our seats, and were prohibited from communicating with other students. As students, we were isolated all day long in the classroom, and so punishing a student by furthering this isolation felt harsh.

- 100. D. Beaudry and D. Friesen were my "monitor" and "supervisor" respectively when I was in grades 11 and 12 (Level 7). I flew through the unit-based self-taught system and could have graduated a year early, in 2005. D. Friesen and K. Schultz strongly encouraged me not to, so I listened to them. I ended up with six months (January to June) of empty time during my Grade 12 year because of this decision, and I was directed to help with the younger students in lower-level classrooms during these six months. I believe that one of the main reasons I was strongly discouraged from graduating early was due to the fact that it was much easier for the leadership at CCA and the Church to maintain control over me if I remained at CCA.
- 101. I was conditioned to believe that I would not be going to university to pursue a career, so I only took the minimum requirements of the core subjects in high school (Math A30, Biology 30, English A30 and B30, and History 30), and made up the rest of the requirements for Grade 12 with courses that were essentially religious electives. For example, I took Christian Ethics 30, Life of Christ 30 (a set of units with a non-cumulative final test at the end which I completed within a few weeks), and a "Special Project 30" which required me to volunteer at a City Centre Church, which was the second church K. Johnson started in Saskatoon, run by J. Randall and C. Randall. I decided that I was not going to attempt taking any math classes beyond Math A30 because I was advised by my sister, and verily believe it to be true, that D. Beaudry told my older sister to quit Math B30, and not even consider taking C30, because she could not teach her.
- 102. Since I was female, and for the other reasons mentioned herein, I was discouraged from attending university despite the fact that I received a Greystones' entrance scholarship to attend the University of Saskatchewan. Instead, I attended Faith College International, the affiliated "bible college", for two years, as this was heavily encouraged by the leadership at CCA and the Church. Attendance was not explicitly required, but strongly encouraged when I attended FCI. I recall one of my male classmates attending university classes at the same time as attending FCI to appease his parents and the Church leadership.
- 103. I finally left the Church in 2009 after attending FCI for two years. I then had to spend two years in night classes upgrading my courses at my own expense, just so that I could meet the minimum requirements for taking an introductory psychology course at the University of Saskatchewan. Specifically, I had to complete physics 20 and 30, precalculus 20 and 30, and

chemistry 30, which cost approximately \$500 per course. I ended up doing well in my math and science classes and realized that I loved the sciences. I attribute the significant amount of time that I have lost in my career, approximately 8 years, to the very poor guidance and conditioning that I received in high school, in addition to the lack of competence of my "teachers" at CCA to provide me with the education that I needed to pursue higher education.

The Effects of the Abuse

- 104. While attending CCA and the Church, I lived in an environment dominated by fear, and uncertainty of potential adverse events taking place, such as physical abuse in the form of Scriptural Discipline.
- 105. I had, and continue to have, a fear and distrust of authority, relationship problems, and negative expectations about myself and others.
- 106. My experience at CCA and the Church has severely impacted my ability to have faith and belief in religion or take comfort in any aspect of spirituality.
- 107. I had, and continue to have, overwhelming feelings of shame, guilt, self-blame, humiliation, and self-doubt.
- 108. I had and continue to have a deep distrust of religious institutions, mental health challenges, interpersonal and relationship issues, health issues, a distorted view of self, and disconnection from social/cultural norms.
- 109. I did not appreciate or understand the nature of the abuse I suffered because of my age and vulnerability in having my educational/spiritual leaders define what is normal behaviour with children. CCA and the Church defined my reality, and I had no ability to challenge the abuse. What was "right" or "wrong" was defined for me, and for the longest time I did not see that what was happening to me was abusive. I felt it was my fault. I was not worthy. I was forced to comply with trusted adults, teachers, and religious leaders with unquestioning obedience.
- 110. CCA and the Church provided for my and my family's entire emotional, spiritual, physical, and social needs. My family and I were in a totally dependent role for all our needs, in a closed society cut off from the general society.

- 111. My family and I were in an environment that used fear, coercion, and spiritual manipulation to control our entire lives from birth to adulthood, restricting our ability to interact with the wider world.
- 112. Accusations of sinfulness, and threats of eternal damnation and hellish punishments were important means of controlling me, my family, and those attending the Church and CCA.
- 113. Shortly after I left the Church in 2009, I was diagnosed with post traumatic stress disorder ("PTSD"), anxiety, and depression, in part due to the physical harms I suffered. To this day I struggle even to write or say the word paddle as it immediately conjures up both the physical sensation of fear (increased heart and respiratory rate, trembling) and vivid images of the instances when I was paddled.
- 114. Since I was 13 years old, I have struggled with body dysmorphia/dysmorphic disorder which was exacerbated daily by the teachers and leaders who were routinely preoccupied with our physical appearance as young girls. The constant monitoring and criticism I received on what I was wearing and the fit of the same led me to develop a distorted view of myself and to become hypercritical about my own appearance.
- 115. I developed various unhealthy habits and coping mechanisms as a form of self-preservation during my time at CCA and the Church due to the constant threat of punishment. Despite leaving CCA and the Church, I feel as though I have been conditioned to engage in these unhealthy habits and coping mechanisms as a result of having to rely on them for such a long and significant period of my life. For example, I struggle to say no to others even when it would be appropriate or in my best interest to do so. This is largely due to my fear of disappointing people, which is ultimately a learned fear from my time at CCA and the Church. I also have significant difficulty recognizing and expressing my emotions because I learned to ignore them out of fear of being punished for them. As a child, I believed that if I kept my thoughts and emotions to myself, they could not punish me for them. Consequently, I learned to keep my opinions to myself, not to think critically, and not to question authority.
- 116. One of the most significant impacts of my experience at CCA and the Church has been the impairment of my personal identity. Beginning in early childhood, I had almost no sense of who I was, what I liked or disliked, aside from generalities like "music" and being physically

- active. Everything was prescribed for me by the Church and/or CCA, from what music I could listen to, to what sports I could play or not play, how I was supposed to dress or what I was supposed to wear, what I was supposed to think and how I was supposed to talk.
- 117. I became extremely suicidal around age 12 to 13. In retrospect, I believe it was a combination of factors but the cognitive dissonance I was constantly facing was a large contributing factor. I could not reconcile the things we were being taught, with how we were being treated, and the continuous violation of my personal dignity and autonomy physically, emotionally, spiritually and sexually. I was taught to ignore my instincts, told not to ask probing questions or questions that appeared to be questioning the absolute authority of those in positions of power. I was taught that the Church knew better than my parents, and this idea was reinforced when I saw how my parents would often not follow the letter of the law at home, for example by watching shows that were "banned" after us children had gone to bed, or my mother skipping church services because she wanted a night off. This was terrifying and confusing. I was told to, and wanted to, believe and trust the people who beat me, but I also instinctively knew that something was wrong with this.
- 118. After leaving the Church, I suffered from near constant suicidal ideation again, a few self-harm incidents, flashbacks, nightmares related to the Church and my experiences there, and crippling anxiety and depression. In the past ten years I have seen 15 different therapists, over half of whom I saw in the first 3 to 4 years after leaving the Church. Ironically, therapy was and still can be triggering for me, rather than therapeutic, because of the manipulative and harmful nature of the "counselling" relationships we were forced to have at CCA and/or the Church. I have been to several different therapists because it has been exceedingly difficult to find a good fit without being triggered by the manner or approach taken by the therapist. Thus, my ability to recover and heal has been significantly impacted by the harm perpetrated by people like C. Randall and E. Schultz, among others, as they pretended to be counsellors with zero qualifications.
- 119. I also missed out on crucial developmentally appropriate milestones throughout my teenage years. We were basically forced to be friends with the people we grew up with and had known all our lives, because any outside influence, including acquaintances or friendships outside the Church, were forbidden. Because of this, I never learned how to start and maintain a

healthy friendship based on mutual respect for each other's boundaries and enjoyment of similar interests. The relationships I engaged in as a child and adolescent were governed by my constant worry about saying the wrong thing or feeling a way I should not feel. I constantly had to police the subjects and content of any conversations I had regardless of who the conversation was with, and this prevented me from learning how to fully trust other people that I care about. I had no experience with, and did not understand what it was like to have, the love and support of a friend without heavy censorship and strings attached. I remember learning about boundaries as an adult long after I had left the Church, and being amazed by the idea that I could have personal choice in who I spent time with and that I could engage in a respectful, enjoyable relationship with another person. From the very beginning, the leadership at CCA and the Church groomed me to be compliant, fearful of punishment (e.g., physical abuse, public humiliation, spiritually cursed), and to dissociate from emotions and many times, intellect, in order to please others or be accepted. My identity was being a good girl, a spiritual girl, someone who pleased and obeyed authority at all times. The Church used the combination of fear and guilt to create a constant sense of obligation within me to please people, never question authority, and use my life for serving the world, which translated to giving my money to the Church and foregoing higher education and career aspirations for the greater purpose of getting married and taking care of a family.

- 120. Therefore, when I left the Church, I was wholly and completely unprepared for the real world and lost any sense of personal identity I had. I had zero skills to protect me from being victimized further despite having left the Church. In addition to missing out on critical emotional and social development from childhood through adolescence, I had also missed all of the relevant culture of my generation and the only exposure I had to the "outside world" was my part-time job, where we were encouraged to "witness" to our co-workers and convince them to come to church services so they could be "saved." I continue to struggle to connect with people and maintain friendships because of this.
- 121. There were various individuals in the leadership structure at CCA and/or the Church that used God as a tool to control and manipulate students and congregants of the Church, and this destroyed my ability to spiritually connect with any kind of organized religion. These

individuals destroyed my ability to use a number of psychological coping methods and toofs with evidentiary basis for improving my quality of life and managing my mental health, such as cognitive behavioral therapy, meditation, and mindfulness. The individuals who used God as a means to control and manipulate others include, but are not limited to, K. Johnson, K. Schultz, E. Schultz, J. Randall, C. Randall, J. Thuringer, C. Thuringer, J. Olubobokun, S. Olubobokun, K.: MacMillan and A.: MacMillan.

- 322. It always has been and continues to be an issue for me to relive and unpack these experiences. As described herein, I have attended a lot of years of therapy working through this and learning how to cope with the trauma that has resulted.
- 123. I make this Affidavit in support of the motion to certify this action as a class proceeding and for no improper purpose.

SWORN BEFORE ME ELECTRONICALLY at, in the Province of Saskatchewan, this 4 day of March, 2025.

missioner for Oaths for Saskatchewan

Commission expires: OR Heing a Solicitor

This document was prepared by:

Scharfstein LLP Name of firm:

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ANIX MUTCHINSON

21.835.1

THIS IS EXHIBIT "A" REFERRED TO IN THE AFFIDAVIT OF STEFANIE HUTCHINSON SWORN ELECTRONICALLY THIS 14 DAY OF MARCH, 2025.

A COMMISSIONER FOR OATHS IN AND FOR THE PROVINCE OF SASKATCHEWAN MY COMMISSION EXPIRES:

-BEING A SOLICITOR-

CHRISTIAN CENTRE ACADEMY Student Application Form

Date of Application Sept. 3, 93.
Grade Enrolling BEGINNER
Date Enrolled
Student Application 1993 - 1994
lame HUTCHINSON, STEFANIE ANNE last first middle middle middless EDWARD AVE. SITOON SASK. S7K 3B street city province postal code
Jome Phone 668-0105 Birth Date 7 / 4/88 Age 5
Emergency Phone Numbers (1824-819) 244-8191 955-0340
School Last Attended NA address
Name of Father MICHAEL A. HUTCH INSON
Address 1314 EDWARD AVE. Phone at Work 277 811 36
address At Work Neshua Photo occupation Maintenance Specialist
Name of Mother JUDITH L- HUTCHNSON
Phone at work
Address at Work 902 QUEEN ST. Occupation BABYSITTER / HUMEMPIK
Does family attend Church? Name of Church CCM
Pastor 10HN80N Phone 242-2844
address 102 PINETOUSE
Married () Separated () of parents: Divorced () Spouse Deceased () Remarried () Other ()

STUDENT STATEMENT OF COOPERATION ALL APPLICANTS GRADES 5 AND ABOVE

a. Is it your personal desire to attend Christian Centre
b. Have you had any difficulty with students or teachers in a previous school?Explain:c. Are you willing to about
c. Are you willing to abide by the rules of the school as stated in the C.C.A. Handbook, including discipline, dress, and all other matters?
d. Have you ever been in trouble with the police? Are you now, or have you ever been on probation? Explain
e. Have you ever been on, or used drugs other than those that were prescribed for you by a physician? Explain
f. Have you ever smoked? Are you now using tobacco in any form? Explain:
 g. I, the undersigned, as a student who has the privilege of attending this school hereby agree to give my wholehearted cooperation, and refrain from the following: Violence and damage against the physical property of the institution. Smoking, drinking, gambling and use of drugs. Improper boy-girl relationships. Fighting, stealing. Profanity and filthy language. Critical and uncooperative attitude. Any infraction of the provincial or federal penal

code.

I further understand that the privilege of attending Christian Centre Academy can be removed at any time the above are violated, or any time, in the opinion of the administration, that my continued presence is not in the best interest of the school.

SCHOOL DRESS CODE - see handbook

SCRIPTURAL DISCIPLINE FORM

Dear Parents, Christian Centre Academy is honored that you have asked our staff to assist you in training your child for Christian leadership. Our total program is designed to develop the spiritual and academic qualities that characterize your child. We appreciate your confidence in our program. To heliave it is necessary out your wishes for total character development, we believe it is necessary to follow Scriptural admonition and procedures. When warranted, Bible discipline will be exercised under the following guidelines:

- The offense will be clearly discussed with your
- A staff member will discuss Scriptural applications 2, and will pray with your child.
- A reasonable number of firm strokes, no more than 3. five, will be administered by a staff member using
- A staff witness of the same sex as your child will
- 5. Your child will not be physically restrained. (If he or she refuses to submit to the paddle, you will be asked to come to the school to administer the spanking. If it is believed to be in the best interest of the school, the child will be withdrawn from the school.)
- After administering of the strokes, the staff member will pray with your child, assuring him (or her) of their love.
- A written record will be made of the date, offense, number of strokes, and name of correcting staff member and witness. You will be notified of the disciplinary action.

I, Michael Hutchinger Studie Hutchinger Name of father and mother
Name of lather and mother
have read the above and agree to support the school in its
policy of Bible discipline without reservation and
personally pledge my support to this Scriptural approach to
discipline. /
Cat 1/93 n/AHut
Date Signature of father
Sept. 3. 93. Swith Patchingn
Date Signature of mother

PARENTAL STATEMENT OF COOPERATION

- It is understood that my child's attendance at Christian Centre Academy is a privilege and not a right; and that if, at any time, in the opinion of the administration, his or her conduct, academic progress, or cooperation with the school's requirements, the school reserves the right to terminate my child's enrollment.
- I give permission for my child to take part in all school activities, including sports programs and schoolsponsored trips away from the school premises. I absolve the school from all liability in the event my child is injured at school or during any school activity.
- 3. I agree with the school's efforts to train my child in the Bible and in the Christian faith and will encourage my child in this and in all other phases of the curriculum.
- I pledge to support the school in its efforts to administer discipline to my child in accordance with the standards of discipline the school sets for itself.
- 5. Students asking to leave school, or moving out of the area, or because of sickness are unable to attend school, will receive a refund on all unused tuition minus the month currently enrolled. It is understood, however, that all other students leaving school for any other reason will receive no refund on tuition, fees, or expenses of any kind. Registration fees in all cases are non-refundable.
- I further promise to pay promptly all fees and charges, understanding that no report cards or records will be given or released if the school account is delinquent. No one will be allowed to graduate from C.C.A. until all financial obligations are paid in full.
- I pledge to participate and attend the Parent Orientation and Parent Association meetings to help promote a good understanding between parents and faculty.

I have read the Parental Statement of Cooperation and I understand the school dress code. I hereby agree to abide by them and I, to the best of my ability, affirm that all questions answered above are accurate, honest, and without deception. MAHale Signature of Father Signature of Mother

Signature of Student (Grade 5 or above)

MEDICAL HISTORY

IT IS MANDATORY that pupils who show symptoms of communicable disease be excluded from classes until readmission is acceptable to School authorities. Your cooperation will be greatly appreciated. Thank you!

- 111 - 12 - CONTRACT HOUSE HANGE THE DATE LANGE SEX F
Pupil's Name STEFANIE HUICHINSINBIRTH Date JULY 4,88 Sex F
Father's Occupation MAINTENANCE Mother's Occupation Homemaker Kitter
Father's Health CLEAT If dead, cause
Mother's Health GLEAT If dead, cause
PAST DISEASED - (If your child has had any of the following,
state age when he had them.)
Mumos Diphtheria Compleions
State age when he had them.) Mumps Diphtheria Convulsions Measles Scarlet Fever Heart Disease Whooping Cough Chicken Pox Diabetes
Whooping Cough
Asthma Discharging Ears Discharging Ears
Asthma Chicken Pox Discharging Ears Hay Fever Pneumonia Discharging Ears (wupter of homes over last 2 yes)
and one of the following
RECENT DISABILITIES - (Please check any one of the following
noted recently.) Tires easily
A of more colds yearly Allergy Frequent sties
Dizziness defects
Growing pains naing
Poor Vision negistant cough
Breath shortness Hernia (rupture) Fainting spells
Speech difficulty Crippling conditions
IMMUNIZATION RECORD - (Please give the date of each) Whooping cough " Tetanus July 93.
IMMUNIZATION RECORD - (Please give the date of each) Smallpox - Scar? Whooping cough " Tetanus July 93 Typhoid Diphtheria July 93 Typhoid
Smallpox - Scar?
Schick Negacia
Measles IX Mo.
a disability due to disease or accident?
Measles 12 Mo. Does your child have a disability due to disease or accident? No.
Does your child have a disability due to disease or accident:
Date Administered Has he been associated with a tubercular patient? No When?
Has he been associated has he fallowing
PERSONAL RECORD - Please answer all of the following The she shy? NO Over active? NO Bite fingernails? The she shy? NO Have temper tentrums? NO Suck thumb? Yellowing Have excessive fears? NO Have temper tentrums? NO Like school? Yellowing The shear of the shear
Have excessive fears? NO Have temper tantrums? NO Suck thumb? Have excessive fears? NO Have temper tantrums? NO Suck thumb? Play well with others? Use Eat breakfast? Play well with others? NO Have temper tantrums? NO Suck thumb? It is a school? Vis. 45
Have well with others? Use Eat breakrast, the his/her rising time? Us. 45
Sort 3.93. SIGNATURE OF PARENT YHATMANAM
REMINDER: No pupil will be excused from P.E. without a
written permit from a physician.
written permit from a physician. * Use for listing inoculation series.
≠

PARENT COMMITMENT FORM

The private Christian school is only as successful as the families that make up the school. At Christian Centre Academy, we have often stated that the individual student's success depends upon the school becoming an extension of the home. For this to happen, there must obviously be open lines of communication between the home and school, and both sides must avail themselves of any opportunities to

Perhaps the most important such opportunity is the monthly parent-school meeting, called the Eagles' Association meeting, held the first Tuesday of each month at 7:30 p.m. This is a time when school events are announced, pertinent policy changes or clarifications are explained, developments in Christian education are noted, and information on our own school's involvement in such things as tax issues and postsecondary issues is shared. As well, the Eagles' Association executive explains its goals, projects, and concerns month-by-month. They also enlist the help of the parents for the various projects they carry out throughout the year, without which our school cannot carry on a quality program. This is also an important time of fellowship among parents and staff.

Experience has shown us that those families who make the effort to be a part of every parent function are the families whose children always reap the maximum benefits from our program. It is imperative that each parent makes the maximum effort possible to attend each Eagles' Association meeting. Our school depends on this commitment, because we truly are an extension of each home, but only to the degree that each family will allow us to be. Please read carefully the following statement and sign below.

"We have read the above information and recognize that our participation is important to the success of the Academy. We are interested in the events that effect our children's lives and desire to be kept informed and stay involved in any way we can. We understand that the level of our involvement will directly effect the level of our children's success in this program. We therefore agree to make every effort humanly possible to have our family represented by at least one parent every Eagles' meeting."

MAttuli
Signature of Father
Signature of Mother

Sept 4,93.

Date

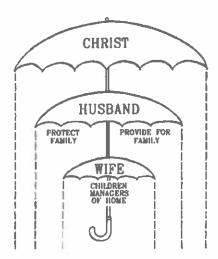
STUDENT RECORD RELEASE

To Releasing School Counselor: School Name Date Address City Province Postal Code Dear Counselor: My children have been withdrawn from your school. Please release their academic and health records to the following church-school. Thank you. **ACCEPTING CHURCH-SCHOOL** Christian Centre Academy Name of Church 102 Pinehouse Drive Address Sask. S7K 5H7 Province Postal C Saskatoon City Postal Code Grade level at Student's Names Age time of withdrawal (Last name first) Signature of Requesting Parent/Guardian Signature of Receiving Principal

THIS IS EXHIBIT "B" REFERRED TO IN THE AFFIDAVIT OF STEFANIE HUTCHINSON SWORN ELECTRONICALLY THIS UP DAY OF MARCH, 2025.

A COMMISSIONER FOR OATHS IN AND FOR THE PROVINCE OF SASKATCHEWAN MY COMMISSION EXPIRES:
BEING A SOLICITOR-

The Rigid Concept of the Umbrella of Protection in Family Relationships



Gothard's umbrella of protection in family relationships puts the husband in charge under Christ and the wife totally subservient to the husband; her access to God is through her husband. The husband is responsible for making the decisions for the family, and it is her job to properly instruct and manage the children; the children's spirituality and access to God is through their mother as she submits to her husband. Children must be totally responsive to their mother's authority.

I am indebted to Sara Jones for these quotes from Gothard's own literature:

Many husbands have acknowledged that their motivation for spiritual pursuits can be quickly destroyed by negative attitudes or lack of enthusiasm from their wives. When a husband gives a command to his family and the wife fails to work out the proper procedures to carry it out, many consequences may occur.

First, the father may attempt to give the laws himself. Very often, however, he is not sensitive to the needs and responses of the children; thus, he may be too harsh or demanding. The wife will then try to compensate by being more lenient than she should be, and the children will sense a divided authority.

Meanwhile, when the wife does not fulfill her function in the family, she will feel inadequate and inferior. She may try to compensate for these destructive feelings by withdrawing, reacting, or looking outside the family for her approval and fulfillment. (WB 15, pp. 615-616, first edition)

Bill Gothard seems to know how my family should function even though he doesn't know my family.

One Additional Level of Authority in the Umbrella

Although not pictured in the umbrella illustration, there is in practice an additional layer of authority. For those in the sway of Gothard's cult-like teaching, Gothard himself is part of the hierarchy of authority—holding the place between the husband and Christ. This is because Gothard is the source of the teaching; he is the one who knows everything. Without his authority it all falls apart.

Like on Facebook



Gothard's Teaching on Authority



Being under authority is one of Gothard's most central teachings. His idea is that God has ordained authorities and that believers must submit to those authorities in order to live a proper Christian life. If we do not submit to God-ordained authorities, then we will have no protection against spiritual chaos.

Instead of reviewing Gothard's views by quoting critics, we will look at a post on the Institute in Basic Life Principles website called What is an "umbrella of protection?"

The introduction states:

God-given authorities can be considered "umbrellas of protection." By honoring and submitting to authorities, you will receive the privileges of their protection, direction, and accountability.

If you resist their instructions and move out from their jurisdictional care, you forfeit your place under their protection and face life's challenges and temptations on your own. [Emphasis in the original]

The article identifies four areas of God-established jurisdictions of authority, along with proof-text references for each one. They are: 1) Family: husbands and parents; 2) Government leaders; 3) Church leaders, elders, and other believers; and 4) Employers. The article explains:

God works through these areas of jurisdiction to train up and protect children, to restrain evil and protect citizens, to stand against Satan and advance the Gospel, and to provide necessary resources for life.

We are responsible to submit to these authorities in order to receive their protection and the blessings of living in submission to God's authority.

The consequences of rebellion are said to be that:

Through disobedience you remove yourself from God's full protection and are therefore far more susceptible to the attacks of Satan. [Emphasis in the original]

Gothard takes these lines of authority very seriously. Particularly damaging is the way Gothard applies authority and the 'umbrella of protection' to family relationships. His teaching is strict, specific, and detailed, as though he has any business interfering with families.

The Rigid Concept of the Umbrella of Protection in Family Relationships



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- Does Paul Tell Us to Bring Our Takes to Church on Sundays? He Does Not
- What Dogs Jesus Say about Sin?
 Not Much!
- Patriarchy, Bill Gothard, and the Umbrella of Protection
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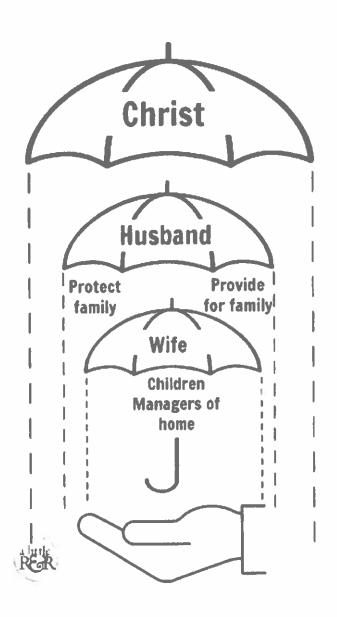
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A COMMISSIONER FOR OATHS IN AND
FOR THE PROVINCE OF SASKATCHEWAN
MY COMMISSION EXPIRES:
BEING A SOLICITOR-



Student Total Development Strategy

Mandate:

As a church and school, we are introducing a new development plan called the *Total Development Strategy (TDS)*. The purpose of the Total Development Strategy is to assist families in the training and development of their children. Our goal is to help your teenagers develop the spiritual passion, character and skills each one will need to fulfill God's plan for their future. We believe that the TDS will help parents and the church work together to accomplish these goals more effectively.

To assist parents in this process of developing their children, God has placed gifted and equipped individuals in the Church. In order to maximize a student's development, all those involved with the student must cooperate together as a team. Using the TDS, we envision meetings where the parents, a school representative, and a church representative can all openly communicate, provide information, and discern together what is best for the student. During this process, parents will provide their unique perspective and information, while staff will offer the same.

As we openly talk together and seek God's will, God will give us direction that will help maximize the growth of each student. Proverbs 11:14, says, "In the multitude of counselors there is safety." The Message Bible says, "The more wise counsel you follow, the better your chances." By contrast, Proverbs 18:1 tells us that "A man who isolates himself seeks his own desire; he rages against all wise judgment." One translation says he "quarrels with every sound principle." All of us together can accomplish more, and accomplish it more effectively.

Neither the parent nor the staff is going to dictate to the other what the answers or problems are. Rather, our goal is for everyone involved to pursue truth and the purposes of God for each student. Working together to achieve our goals, we will look at the total development of each student. As a part of this process, we will openly examine a number of things: schedules, the impact of activities on home life, the student's walk with God, character development, and academics and church life.

Character development, and academics and acade

The Team:

As mentioned above, this will be a team process. The TDS team will be made up of the student, the parents, the appropriate supervisor, and most often a youth department staff involvement with the student or family. This would be the exception, not the rule. As without the student present.

Initially, the team will meet together to set an appropriate plan for each student. This plan will be designed individually for each student and will be written as a set of specific goals that can easily be evaluated by those in the team. This process will only be successful if there is an attitude of openness and receptivity on the part of the parents, the staff, and the student.

As we work together, there may be a need for more discussion, or counsel at another level, (for example, the parents may want further input into their parenting, and this would not be handled at the TDS level). We are committed to following through whenever and however necessary. We will always inform and involve those more qualified to address any issues that may arise in these team discussions.

For all the level 6 and level 7 students, TDS meetings will replace the fall parent-teacher interviews. After that, we will continue to have meetings where the issues that arise demonstrate the need for further discussion.

Character Development:

The growth of Christian character is at the heart of Christian maturity. Therefore the development and evaluation of character will continue to be at the heart of the TDS process. We define character as the "unconscious doing of right". This means that character will be demonstrated in actions, attitudes, and words over a process of time. We cannot judge character simply by one action occurring in one setting. Any individual can act right in an isolated situation, or in a certain environment. However, Godly character will produce consistency in right action, attitude, and speech, in all environments, over a process of time. Therefore, character must be evaluated in all areas of the student's development. As we set specific goals in any of the six development areas, (see development guidelines) character development will always be the priority.

The Student's Schedule:

The team will also evaluate the student's schedule to make sure it is balanced and healthy. This will encompass all aspects of the student's life, including school, church, and home. All the team members must consider the benefits and time demands of each area in which the student is involved. In considering these things, we believe there are several areas of development that should be considered for every student. One of our goals will be to establish a balanced schedule for each student. With respect to the academy, we understand that every student will have an academic profile. The demand that this places on the student's schedule will vary depending on family goals and academic ability. Beyond this, every student is required to participate to some degree in the other development programs of the academy, such as music, drama, and athletics.

We believe involvement in teen classes and teen functions are also essential for both the spiritual and social development of our students. Furthermore, we believe that a lifestyle of corporate fellowship is necessary for every believer, and this includes both regular church attendance and being available to serve the body.

Christian Centre is a church built on the foundation of strong home and family life. In developing our students, we must make sure this priority stays intact. Therefore, we must include it in all scheduling considerations. Every student needs ample time in their schedule for normal family routines and activities, including family devotions, discussions, and social activities.

All these important areas must be included, even though different amounts of time will be given to each. For instance, students may serve in the church only three or four times a month, but they will spend a much larger portion of every month in academic studies. Further, in a given season, a student may spend several hours a week in athletics but only Wednesday evenings in teen class. Even though the time given to each of these areas will vary, each area is of equal importance.

We will always defer to what is best for the student when over-scheduling has become detrimental, although as a rule we must consider our commitments to church departments and their operation, and evaluate what is best for "us all". This means that some adjustments we may like to make immediately may have to be postponed as we consider the ramifications to the programs we run and the effect these adjustments may have on all the other students, or departments. There are times when it is appropriate to do what is best for "the team" instead of what might seem best for an individual in the short term.

THE FOLLOWING PROVIDES SPECIFIC INSTRUCTIONS:

Development Guidelines Score Sheet:

Enclosed are two copies of the *Development Guidelines Score Sheet*, one each for the parents and the student. Six major areas of student development are listed, with three sub-categories under each. On a scale of 1-10, the student and the parents need to separately evaluate the student in each sub-category, and total each major area. Each important that neither party (student, parents) confer with each other in this scoring. You may wish to refer to the individual evaluations when developing goals together. However, because the TDS is a group process, it is essential that both the parents and student bring their individual evaluations to the team meeting. Below are grading guidelines. We urge both student and parents to be objective and honest with themselves in scoring. Along with the goal worksheet (see below), this information will be brought to the team meeting to assist the team in determining a specific game plan (set of goals) for the student.

Grading Guidelines:

Unacceptable development: 0 to 9 total per Development Area

Significant development needed: 10 to 15 total per Development Area

Acceptable development: 16 to 21 total per Development Area

Exceptional development: 22 to 30 total per Development Area

Goal Development Worksheet:

You will find a development worksheet attached. After giving careful consideration to the development guidelines, and having evaluated each of the six development areas, the parents and child should use this worksheet to write development goals. We recommend that parents discuss this goal worksheet with their child prior to the team meeting. Although we suggest that you consider identifying goals in each of the categories listed, only two or three of these goals will likely be an immediate priority. Most of the goals listed should be easy for the student to attain in his/her present flow of development.

The Goals:

Though the parent and the student will come to the TDS meeting having some goals already written, the team will work together to determine what goals will be set for a that are seen as essential for the student's development.

As discussed above, character development is not listed as a specific area. This is because character can and should be considered in all areas of a student's development. However, six areas. (You will find that all of the character development areas that were in the evaluations used last year are identified in one or more of the six development categories.)

Evaluation:

The team will review the grading of the six development areas, and all involved will agree to a starting value for each area. This will help the team to consider which areas should be given the highest priority when setting specific goals. As a team, our goal will be to target and observe growth in each student over time. It is not healthy to put a major emphasis on too many areas at once. Growth occurs line upon line and precept upon precept. Though all areas of development are considered important and essential for Christian maturity, priority will be given to evaluating the specific goals that have been set by the team. If other areas of concern arise, new goals can and should be established. One of the team's responsibilities will be to assist the student in reaching the goals, which may involve additional consultations. This will also mean evaluating and establishing new goals as the student develops.

59

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A COMMISSIONER FOR OATHS IN AND FOR THE PROVINCE OF SASKATCHEWAN MY COMMISSION EXPIRES:

-BEING A SOLICITOR-

Day Monday Date Feb. 12 day I went to church Pre-teens was on 1 don't know I gave it bors dide no morship and Mr.D. got really mad and yellood and cried at us. I don't understand why when I put my beaut wto b marzyibbild God and giving him 100% that Mr. D rebukes and screamos at use Anyways, than ! Went to Collette's b-day party. Before

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A COMMISSIONER FOR OATHS IN AND FOR THE PROVINCE OF SASKATCHEWAN MY COMMISSION EXPIRES:

BEING A SOLICITOR-

her heart. Her life was changed forever. 63