

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
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 JENNIFER SOUCY (BEAUDRY), SWORN/AFFIRMED MARCH 18,
2025.

I, JENNIFER SOUCY (BEAUDRY), of the City of Saskatoon, Saskatchewan, MAKE
OATH AND SAY:

1. I am a Proposed Representative Plaintiff 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.
2. I was born in Saskatoon, Saskatchewan on August 29, 1995. My parents, Phil Beaudry and Dawn Beaudry, raised my two brothers and I in Saskatoon. Beaudry is my preferred surname. I am currently in the process of obtaining a divorce after I removed myself and my special-needs daughter from an extremely violent five-year

marriage. My daughter is 7 years old and has been diagnosed with Rett Syndrome, which is a rare neurological disorder that disrupts brain development. She is unable to speak, walk or move her hands.

3. From 1995 to 2014, I attended Saskatoon Christian Centre Inc., presently known as Mile Two Church Inc., situated at 102 Pinehouse Drive, in Saskatoon, Saskatchewan (the “**Church**”). When I became of school age, I began kindergarten at the affiliated Christian Centre Academy, which later became Legacy Christian Academy. In or about August of 2024, Valour Academy Incorporated was incorporated and assumed the operation of the school which has previously operated at Christian Centre Academy and then Legacy Christian Academy. The school is hereinafter referred to as “**CCA**”.
4. I attended the Church and/or CCA for the first nineteen years of my life. All CCA students and staff were required to attend the Church services, and all Church members were required to register their children at CCA. This requirement created an all-encompassing institution.
5. I was involved with CCA and the Church in several different capacities, such as:
 - a) Attending the Church from ages 0-19;
 - b) Attending CCA as a student from kindergarten to grade 12;
 - c) Acting as staff as a children's church worker from ages 12 to 16;
 - d) Attending Faith College International (“**FCI**”) as a student, which was the internally run Bible school at the same address; and
 - e) Acting as the assistant coach for the senior girls volleyball team for one season while I attended FCI.
6. 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 Stefanie Hutchinson.

7. 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);
 - l) Settlement Discussions (at any time); and
 - m) Various other interim applications that may be made to the Court from time to time.

8. 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-examination 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;
- l) Provide instruction to Class Counsel as required; and
- m) Provide evidence in support of Court approval of any settlement.

9. To date I have taken the following steps to fairly and adequately represent the interest of the members of the proposed class (the “**Class Members**”):

- a) I retained the law firm Scharfstein LLP to act as Class Counsel;
- b) I assisted in the creation of a committee of members of the proposed classes 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, of which I attend meetings regularly;
- d) I have regularly discussed this action with other Class Members and members of the Steering Committee;
- e) I have read, commented upon and approved the Statement of Claim and amendments thereto; and
- f) I aided in drafting this affidavit.

10. 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.
11. I have reviewed the Litigation Plan, attached as Exhibit “C” to the Affidavit of Caitlin Sheridene Erickson, sworn March 13th, 2025 (hereinafter “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.
12. I believe that I can fairly and adequately represent the interests of the Proposed Class Members, and I am committed to fulfilling my responsibilities.
13. 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.
14. 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.
15. 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>
16. I am advised by Class Counsel, and believe it to be true, that, to date, approximately 104 Proposed 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.
17. 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.
18. 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.

19. I am advised by Class Counsel, and believe it to be true, that they continue to receive Intake Forms from Proposed Class Members.
20. 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

21. 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) Lou Brunell (“**L. Brunell**”) served as the principal when I first started attending CCA in 2000.
 - b) Ken Schultz (“**K. Schultz**”) served as the Director of CCA when I first started attending in 2000 and was also the Director of FCI when I attended for the 2013/2014 academic year. 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 related to his position at CCA and the Church.

- c) Keith Johnson (“**K. Johnson**”) was the head pastor of the Church the entire time that I attended the Church and CCA.
- d) Tracey Johnson (“**T. Johnson**”) is the wife of K. Johnson, the head pastor of the Church.
- e) Brien Johnson (“**B. Johnson**”) is the son of K. Johnson, and the children’s church director for a period of time while I attended CCA and the Church.
- f) Kevin MacMillan (“**K. MacMillan**”) was an elder in the Church when I started attending in 1995, and ran the Rejoice School of Music program at FCI when I attended in the 2013/2014 academic year.
- g) Anne MacMillan (“**A. MacMillan**”) was an elder in the Church when I started attending in 1995, and ran the Rejoice School of Music program at FCI when I attended in the 2013/2014 academic year.
- h) Nathan Rysavy (“**N. Rysavy**”) was my teacher at CCA from 2006/2007 – 2007/2008, for grades 6 and 7. He was also a teacher in the children’s church for ages 5 and 6 while I attended. That classroom was referred to as “David’s Club”.
- i) Randy Donauer (“**R. Donauer**”) was in a leadership position at CCA and the Church. It was my understanding that R. Donauer was K. Johnson’s “right hand man”.
- j) Dawn Beaudry (“**D. Beaudry**”) is my mother and was a teacher at CCA from 1987 until 1990, and then again from 2000 until 2022.
- k) Aaron Benneweis (“**A. Benneweis**”) was the athletic director of CCA. He was also the coach for the senior boys’ basketball team and the track team at CCA. A. Benneweis has been convicted of one count of sexual assault pursuant to Section 271 of the Criminal Code, and seven separate assaults between 2008 and 2012 against myself pursuant to Section 271 of the Criminal Code, and sexual exploitation against myself while in a position of trust and authority as a teacher pursuant to Section 153 of the Criminal Code, and sentenced to two years less a day and three years probation in January of 2024.

- l) James (Jim) Randall (“**J. Randall**”) was an elder of the Church, and later became the pastor at City Centre Church, which was a daughter church to the Church.
22. My parents joined the Church in the 1980’s. After their wedding in 1987, they told their pastor, K. Johnson, of their desire to move to Guatemala as missionaries. My parents, D. Beaudry and P. Beaudry, told me, and I believe it to be true, that K. Johnson advised them to stay in Saskatoon for a few years to settle into their marriage before moving. They obediently waited three years before moving to Guatemala for approximately five years, from 1990-1995.
23. My mother received her Bachelor of Education from the University of Saskatchewan in 1987, then briefly taught at CCA prior to moving to Guatemala. She resumed teaching full-time at CCA after my younger brother was old enough for daycare in the early 2000s and continued the same until 2022. In addition to teaching at CCA, D. Beaudry was also in charge of organizing and coordinating the high school graduation, some re-writing of high school Math and English courses for the Saskatchewan Association of Independent Church Schools, as well as teaching in the children's church.
24. My father, P. Beaudry, worked as a janitor during his earlier years at the Church and subsequently taught in the Churches children's church alongside my mother for many years. That classroom was called “God’s Squad” for children ages 7-10. He also worked for K. Johnson in a more personal capacity, for example by doing yard work on K. Johnson’s acreage and/or mechanical work on his vehicles.
25. As aforementioned, I attended the Church and/or CCA for the first nineteen years of my life, from 1995 to 2014.

The Culture at CCA and the Church: “The Legacy Way”

26. K. Johnson came from Texas (United States of America) and took the position of head pastor at the Church. He seemed to take great pride in running the Church, claiming to be the direct voice of God to all members of the Church and CCA. He deemed himself "our shepherd" and all members were "his sheep". All members were told and expected to base our entire lives off of the words of our "God-ordained and anointed leaders." Despite personal relationships with God being heavily emphasized, we were also taught that we needed a pastor to stand between us and God.
27. K. Johnson's nephew, Willie George, was a pastor at Church on the Move (“COTM”) which is located in Tulsa, Oklahoma. The Church and CCA had openly close connections with COTM and Lincoln Christian School, their affiliated Christian school in Tulsa. The Church and CCA closely modeled itself after COTM and thus operated similarly. During my teenage years, I noticed that some of the sermons K. Johnson preached at the Church were previously delivered at COTM. This conflicted with K. Johnson's claims that his messages were directly from God and specifically for the Churches' congregation. This caused me to constantly question the true source and authenticity of the sermons.
28. A few other close connections K. Johnson had were with his Sr. pastor, Bob Nichols, Kenneth Copeland, and marine turned preacher, Mark Barclay, all of which are based in the United States.
29. Families that attended the Church and/or CCA lived in their own homes, but those with children attended the building seven days a week, sometimes multiple times a day for activities at the Church and/or CCA. This applied to me and my family. Our lives were completely centered around this total institution and our various commitments to the Church and/or CCA were all consuming.

30. My weekly schedule, at a bare minimum, always included the following:
- a) Sunday: Morning service at the Church, which included praise and worship songs, an offering sermon, the regular offering, the main sermon, prayer time, and sometimes a second "special" offering, which was generally a fundraising effort for guest speakers and current events. A typical Sunday service lasted anywhere from three to four hours;
 - b) Monday: School day (9:00 a.m. to 3:30 p.m.) followed by sports practice;
 - c) Tuesday: Early morning prayer service at the Church from 6:30 a.m. to 7:30 a.m., and then wait at CCA for school day to begin. I waited at CCA after prayer service as my mother had to attend staff meetings as a teacher at CCA that began at 8:00 a.m.. Once school was done for the day, I would have sports practice or a game;
 - d) Wednesday: school day (9:00 a.m. to 3:30 p.m.), followed by sports practice, and then band practice after sports. I would go home for supper and then return to the Church for evening service.
 - e) Thursday: school day (9:00 a.m. to 3:30 p.m.), followed by sports practice or a game.
 - f) Friday: school day (9:00 a.m. to 3:30 p.m.), followed by sports practice or a tournament. The Church's youth group had occasional events on Friday evenings.

- g) Saturday: one hour prayer service (6:00 p.m. to 7:00 p.m.) followed by regular church service beginning at 7:30 p.m., which lasted two to four hours on average though sometimes longer.
 - h) Occasionally the Church or CCA would host youth group events in the evening that were highly recommended, and absentees were noted.
31. K. Johnson was an extremely domineering leader that demanded fear and unearned respect. His methods were very authoritarian with minimal understanding and flexibility when it came to accommodating other people. He viewed himself as above everyone else and he always needed to have the last say. Anyone who dared to question him or his teachings were treated as if they were attacking him, and he would commonly accuse them of being filled with the "spirit of strife/rebellion," no matter how genuine the question may have been. He utilized a multitude of intimidation and manipulation tactics in an attempt to maintain as much control over everyone's lives as possible. This helped K. Johnson control all of the information that flowed into and out of CCA and/or the Church.
32. There was an insidious and extreme imbalance of power between the leadership at CCA and/or the Church and everyone else. As a student and minor congregant, I felt this imbalanced power dynamic but I did not fully comprehend why I felt the way I did. I just knew that I was supposed to submit to authority at all times, without any doubt or question. Out of fear and self-preservation, I did just that.
33. K. Johnson dictated what materials were permissible for congregant and/or student consumption. Anything produced by non-Christians was considered "secular" and "influenced by the devil." Anything with magic was considered witchcraft. Information was not only blocked out, but it was also internally produced. K. Johnson and his chosen elders in the Church authored books, which were sold in the Church

bookstore. It was strongly recommended that every attendee read these books during announcements at the Church and through promotion at the bookstore.

34. For example, one form of internally produced material was magazines for the pre-teen and teenage girls that were produced by the female youth group staff. It contained devotionals, Bible study activities, beauty advice, announcements, and games or activities. These were meant to replace the pop culture magazines that we would get punished for reading.
35. As a more foundational example, K. Johnson is the proud author of the Child Training Seminar Manual (the “**Manual**”), a copy of which is attached to Catilin’s Affidavit as Exhibit “F”, in which he lays out exactly how all parents are to discipline their children whenever they chose to express their childish will. It was required of all members of the Church and/or CCA to purchase and read the Manual, and all parents were expected to train their children in accordance with it. The Manual was the foundation for the punishment methods used in the Church nurseries, children's church, and in CCA. The teachings in this Manual were non-negotiables that were viewed as absolute truths. K. Johnson heavily believed in the concept "spare the rod, spoil the child." K. Johnson was not answerable to or accountable to anybody.
36. Included in K. Johnson’s Manual are the following directions:
 - a) “If you desire for your child to become obedient and willing to accept God’s standards as his own, you will have to utilize the process that God designed to obtain those results.”;
 - b) “Susanna Wesley said she disciplined each of her children until their will was broken. The liberal humanists of our day would go into immediate shock at such a statement. But in Ps. 143:10, the psalmist prayed for God to teach him to do His will. Jesus said, “I came not to do my will, but to do the will of my Father.”;

- c) “A baby cries. Mommy rushes over to the crib and coos: “What’s the matter with Little Precious? Mommy doesn’t want Little Precious to cry.” So mommy holds Little Precious, and Little Precious stops crying. Shortly, mommy realizes that she’s got work to do, so she puts Little Precious down. The minute she does, what happens? Right! Little Precious starts crying again.

The question is: is there anything the matter with Little Precious? The answer is: Nothing but wanting mommy to cater to it’s senses. The sad thing is, many mommies do just that: cater to the senses of their infants. Without realizing it, parents thus teach their babies to be controlled by their senses, while at the same time failing to develop self-control in their children.”;

- d) “When I was a child, I often wanted to run through the house, jump on the furniture, yell at my parents, and be ill-mannered at the table. But my dad hadn’t been trained in the handling of hyper-active children. At such times, how I would have loved some medication! But dad didn’t know he was supposed to give me medication! Instead, he gave me a spanking. I wasn’t nearly as hyper-active after he got through with me.

We apply the same standards of response to hyper-active children in our Christian school, and the problem isn’t a problem for long.”;

- e) “Because of this, God has commanded parents to discipline their children – spank them, counsel them, teach them the awfulness of sin and the results of doing wrong.”;
- f) “2. Sometimes spankings will leave marks on the child.

If some liberal were to hear this, they’d immediately charge us with advocating child-beating. Child beating is when an enraged parent who doesn’t love his child begins to beat up on him/her. Is that what I am advocating? Is that what the Bible tells us to do?

What is the purpose in spanking our children? Primarily, it is to teach them that sin is wrong, that sin is always punished, and that sin always hurts them more than anyone else.

Therefore, if we're going to make a believer out of them, we're going to need to ensure that the punishment is severe enough to make a lasting impression. Occasionally, proper discipline may leave welts.”;

g) “An undisciplined child is unteachable, repulsive, rebellious, and foolish. If we didn't have discipline in our Academy, we couldn't control our students at all.”;

h) “5. Spanking should be a ritual

A ritual is any practice regularly repeated in a set, precise manner.”;

i) “Have him bend over and apply the paddle firmly. Don't permit any wiggling around or jumping around. Don't allow any pre-discipline howling and sniveling. Don't let his crying and begging diminish the degree or severity of punishment.”; and

j) “As the head of the household, it is the father's responsibility to see to it that the mode and method and rules of discipline are carried out as agreed upon. Never keep secrets from one another. Be sure not to gripe at and verbally harass your children. Mothers particularly need to guard against this.”

37. 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 submit a Student Application Package. Attached hereto as **Exhibit “A”** is a true copy of the Student Application Package that was completed and submitted by my mother on September 3, 2003, which includes the following documents:

a) Student Application Form;

- b) Student Cooperation Form;
 - c) Parental Statement of Cooperation;
 - d) Scriptural Discipline Agreement; and
 - e) Student Record Release Form.
38. Corporal punishment was a foundational element of discipline that was commonly used by the leadership and staff at CCA and/or the Church, including the children's church. This corporal punishment was referred to as "scriptural discipline". As the youth congregants were going through training to work in the children's church, it was required that they learn how to administer corporal punishment "properly". This led to teenagers watching adults paddling young children in a private room on multiple occasions for years. K. Johnson regularly said, "Spare the rod, spoil the child." This served as an integral concept underlying all discipline methods.
39. There were three sizes of wooden paddles (infant, child, and teenager) that were sold in the Church bookstore next to the children's section and the candy. Parents were instructed to strike their child's bottom with the paddle to correct bad behavior. The staff at CCA would send home yellow slips called "cautions" in a student's envelope, which instructed the parents to paddle their child at home for something done at school. The parent would sign the yellow slip to confirm that they completed the punishment at home and the slip would be sent back to CCA the next morning.
40. The process of the corporal punishment was described in the 1982 CCA Policy Handbook, a copy of which is attached to Caitlin's Affidavit as Exhibit "J", in the following terms:
- a) Corporal Correction may be needed at times to bring about changes in attitudes and behaviour. It may be used for the following types of violations: Expletive or abusive language, fighting, cheating, disobedience, defiance or other serious offences. The procedure we follow is:
 - (i) The offence is clearly discussed with the student.

- (ii) A staff member will discuss Scriptural applications and will pray with the student.
- (iii) A reasonable number of firm strokes (no more than 5) will be administered by a staff member using a simple, flat paddle.
- (iv) A staff witness of the same sex as the student will be present.
- (v) The student will not be physically restrained (if the student refuses to submit to paddling, the parent will be asked to come to the Academy to administer the spanking. If it is believed to be in the best interest of the Academy, the student will be withdrawn from the Academy).
- (vi) After administering the strokes, the staff member will pray with the student, assuring him or her of their love.
- (vii) 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.

41. It was made clear to students through the ACE program booklets (essentially the students textbooks), through the staff at CCA, and through examples provided at the Church, that not following the rules could, and likely would, result in a demerit (paper slip) or a paddle. 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 Caitlin's Affidavit as Exhibit "J":
 - 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;
 - h. Attitude or Disobedience;
 - i. Goals set improperly;
 - j. Failed check up;
 - k. Disturbance in Chapel;
 - l. 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;
 - q. Restroom;
 - r. Disturbance in Learning Centre;
 - s. Tardy – 3 Demerits;
 - t. 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 to Catilin’s Affidavit as Exhibit “K”:

- a. Wasting Time
 - (i) Turning around in office
 - (ii) Not working (includes turning around in office, daydreaming, playing in office, doodling, etc.)
 - (iii) Late in the morning, or late from breaks
- b. Disorderly
 - (i) 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
 - (i) Covers all infractions taking place on break, lunch, before and after school.

42. I frequently witnessed students who struggled academically being punished, not only by corporal punishment, but also by being forced to do intense physical activity for extended periods of time, such as being required to run lines (the act of running back and forth touching lines on the gym floor), do wall sits while holding a medicine ball or stacks of heavy books (placing your back against the wall in a sitting position without a chair while holding a heavy medicine ball or a stack of heavy books), and/or do "boards". "Boards" required a student to push a towel-covered 2x4 piece of wood back and forth across the gym floor until the student was physically exhausted and/or

ill. If a teacher decided that a student was misbehaving or being disruptive in any way in the classroom, I have witnessed them instructing the student, on the spot, to immediately run 400 meters around the soccer and football field that was right outside of the CCA building, in their school uniforms, while being supervised by the instructing teacher to ensure completion. I have witnessed occasions when the student was instructed, upon completion, to “do it again”.

43. There were intercom speakers throughout the hallways and classrooms at CCA, and the secretary would call students to the principal's office by name so that everyone could hear it. It was common knowledge amongst the students that individuals were not called to the principal's office for any positive reason, but instead, were usually called to be interrogated or punished.
44. Throughout my attendance at CCA, I noticed that the consequences for perceived inappropriate behaviour were inconsistent and varied from one student to another. The only consistency was that punishments were almost always unduly harsh and/or prolonged. For example, my older brother was kicked off of the high school basketball team for watching a funny, but unapproved, YouTube video.
45. Any resistance to confrontation or punishment resulted in more severe punishments being inflicted to discourage any similar behaviour in the future. Punishments and further punishments for resistance were enforced at all ages, including infants and toddlers. Age-appropriate behaviour was not considered at all when determining whether discipline should be given, and the method of discipline used.
46. Knowing of the punishments acted as a frequent reminder of the harm we would suffer if we did not strictly comply with their rules and expectations. This was extremely anxiety inducing as the rules and expectations were extensive and compliance with those rules and expectations was required not only at CCA and the Church but also in our private lives outside of CCA and the Church. This caused me to constantly be petrified of making simple mistakes or acting like the young child that I was (i.e. by

not being able to sit still and be silent for extended periods of time). I have talked to many other Class Members who have expressed to me, and I verily believe it to be true, that they suffered similar fear and anxiety for the same reasons.

47. I did not feel like the leadership at CCA and/or the Church ever worked to empower or boost the self-esteem of the students at CCA and/or congregants of the Church. Obedience and control were the dominant objectives. Your goals and self-will were to line up with God's will in order for it to be considered "correct."
48. As a means to maintain absolute control over the narrative, the 2006 CCA Policy Handbook, a copy of which attached to Caitlin's Affidavit as Exhibit "K", provided the following warning to cast suspicion on a child's version of any events at 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 hear 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 unformed. Close parent/school communication will prevent this.”

49. K. Johnson regularly slandered people from the pulpit during his sermons for numerous reasons.
50. Family units that left the Church and/or CCA were publicly and explicitly excommunicated, with K. Johnson, K. Schultz, K. MacMillan, B. Johnson, R. Donauer and others, referring to them as "wolves in sheep's clothing" that were never truly with us in spirit from the beginning. In his sermons, K. Johnson would criticize, berate and chastise anyone who left the Church or was exiled from the Church. We were instructed by K. Johnson, and all of the leadership, to never interact with these people that were then deemed to be evil influences. For example, K. Johnson expressed his strong feelings from the pulpit about my aunt, uncle, and their children leaving the Church. Although he did not explicitly name them, everyone knew who he was referring to.
51. The students at CCA put on an annual Christmas concert that occurred during a Wednesday church service in December, so parents and family members could watch the students perform the music and drama they had been practicing at school. During one of these Christmas concerts, I remember hearing an unusual commotion of a few people coming and going from the sanctuary out into the lobby area. I was not sure what was going on at the time, and it was never addressed afterwards. Years later, I heard what happened through both word of mouth and stumbling upon a Vimeo video of a voice recording of R. Donauer kicking out one of the performing student's family members, simply because they had previously stopped attending the Church and CCA themselves, and therefore, were publicly excommunicated. They expressed that they were simply attending to watch their niece perform her Christmas music. That was

not allowed, and R. Donauer was threatening to call the police to remove them from the property if they did not leave voluntarily. I have been advised by Chasity Watson, and verily believe it to be true, that she recorded the incident, and that the Vimeo video is an accurate portrayal of the incident. Attached hereto as **Exhibit "B"** is a copy of the Vimeo video.

52. I remember K. Johnson getting angry at congregants of the Church for looking at the people who were coming and going from the room while he was preaching. Eventually, he assigned ushers to the back row so that they could redirect people re-entering the service to sit in the back to reduce distraction. During the early morning prayer services on Tuesdays, leadership would publicly call out congregants that looked too tired, did not sing loud enough, or did not saying "Amen" or "Hallelujah" often or loud enough. I recall another situation in which K. Johnson was preaching and felt that people were not paying enough attention. He stopped preaching mid-sermon and instructed every person to stand up and find a new seat switching those in the front rows to the back, and vice versa.
53. Anyone could be harshly scorned at any time for perceived wrongdoings. As students at CCA, we were evaluated on all aspects of our lives, not just at CCA and the Church, but also at home and in our social lives, at all times. Public humiliation was a regular occurrence within this environment. It was a common practice for leadership at CCA and/or the Church to make a public example out of students and members, both as good or bad examples. This public showcasing was an effective intimidation and emotional manipulation tactic.
54. I specifically remember K. Johnson, B. Johnson, and K. Schultz yelling and screaming at congregants while preaching. They called it passion, but it was very intense and intimidating for all ages. I remember thinking that they sounded furious and threatening.

55. The Church imposed their standards on the children/students and their families, as opposed to families being encouraged to develop their own values, morals and culture. I am advised by my mother, and believe it to be true, that parents were convinced that attending and abiding by the culture at CCA and the Church was God's will for them and their family, and the best thing that they could possibly do for their children.
56. I remember children being suddenly removed from their families and friends and sent away for punishment without any explanation other than it being "God's unnegotiable will for them". This occurred to classmate of mine, Mark Drapak, as they forced him to leave his family home to attend and reside at Canaan Land Ministries in Saskatchewan. Canaan Land was a rural farm used as a rehabilitation center by the Church and meant for drug addicts, gang members, and problem adults. CCA also used it as a means of getting rid of "problem" students. We were often reminded that God could reveal his will for your life to someone else, which would then be enforced upon you.
57. I also understood that I, being a female, was inferior to the males around me, regardless of whether they held a position of authority. This was also heavily enforced within marriages as well. I got married the week after I turned nineteen years old, and I remember struggling with how much I was expected to compromise as a wife. I did not understand how I was supposed to compromise so much of myself, and then still be able to be my own person.
58. There was no trust given to congregants or students. CCA and the Church monitored and controlled every aspect of our daily lives, regardless of whether it related to our activities at CCA or the Church. Our lives were so heavily controlled by leadership out of fear that we would make tragic personal decisions without their constant monitoring. Critical thinking and common sense were overrun by indoctrination. We were taught that only God could judge our hearts, but our lives were thoroughly

investigated at all times and from every angle by those in power at CCA and the Church.

59. Students were forbidden from hanging out with anyone that did not attend the Church or CCA, including family members, getting an outside job, participating in club sports, or participating in city league sporting events if they occurred during scheduled service hours at the Church. We were told by K. Johnson and the staff at CCA and the Church that this was to protect us from the "bad influences of the sinners out in the world", yet we were instructed to go out and evangelize to these same "sinners".
60. As the Church and CCA dictated entirely who we could associate with, we did not form any friendships with anyone outside the Church and CCA, including family members and relatives that were not members. Students and/or congregants of the Church 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.
61. Children were assigned a personal mentor (who had to be a member of the Church or CCA) once they became a pre-teen, which remained in place for the duration of your attendance at CCA. The mentor would meet with you regularly to discuss the details of your personal and spiritual life. There was no topic that was off limits for staff to ask about and an honest reply was expected from the student immediately. These meetings with the mentors were extremely personal and invasive in nature. If you did not cooperate and share information, you would be punished in whatever way they deemed appropriate. At the same time, you could be punished at any time by anyone for information that you did disclose to your mentor in private. Essentially, you were punished if you did not share but you could also potentially be punished for anything you did share. On occasion, these meetings occurred with youth group staff, the youth, and their parents. If there were any disagreements, the child was always deemed to be in the wrong and/or lying.

62. I never felt like I had any sense of privacy, nor any safe space to express my own thoughts and/or concerns. Being assigned a personal mentor, who was a member of the leadership, was one of the main contributing factors to my feelings of paranoia and lack of privacy. I wish to emphasize that I intentionally did not call the personal mentor a "counsellor", because none of them had any training or licensure to be acting in such a role. They simply monitored and enforced compliance with K. Johnson's rules and expectations, while also gathering personal information about your life.
63. Students were encouraged to rat each other out to staff members. We were told that if we were aware of someone doing something wrong and we did not tell anyone about it, then we were just as guilty as the one performing the wrongdoing. This played into a built-in lack of trust between students and leadership. This way, staff could extend their eyes beyond their physical presence. Students would sometimes be explicitly instructed to follow and report back to leadership on other students.
64. The staff at CCA and the Church manipulated its students psychologically by using tactics such as scapegoating and aggressive interrogations. It was made very clear to children, which included myself, that "being bad" without confessing your sins and asking for forgiveness from God would result in spending eternity in hell after death. This was an effective way to elicit desired behaviour at an early age using fear, but that fear was mislabeled as "the fear of God," eluding to awe and respect. This also successfully quashed personality expression and any questioning of our belief system.
65. Students and congregants of the Church were constantly told that God could tell other people that we were sinning by K. Johnson and the staff at CCA and the Church. There was no sense of privacy or safety when you truly believed this, especially when people were rewarded for reporting on others. There were "sins of omission" and "sins of commission," so one could also be faulted for not getting involved in, or reporting on, other peoples' personal matters.

66. I lived with a constant sense of paranoia. This was largely caused by the expectation and associated pressure of having to always perform with excellence, coupled with the knowledge that there were eyes and ears everywhere watching your every move, for which you may be called upon to answer.
67. I witnessed scapegoating on numerous occasions, which was often perpetuated by the staff members of CCA and/or elders at the Church. I remember staff members falsely attributing blame or the spreading of information to an innocent student, with the intention of diverting attention from the actual perpetrator or avoiding personal responsibility. As a student, this scapegoating felt to me like a form of psychological warfare as I often saw it employed by the staff at CCA and the Church as a means to manipulate students' relationships, create divisions in the student body, and/or assert their authority. I observed staff members wrongly implicating students by shifting blame, sowing discord or instilling fear, which ultimately eroded the trust amongst the student body, thus impacting the well-being of students within the school environment. This constant scapegoating led to a toxic and seriously distrustful atmosphere amongst the students themselves, and between the students and staff. As a student, it felt as though we were under a constant threat of being exposed for "sins" or "disobedience", regardless of whether we actually behaved in the way we were being accused of.
68. Church attendees were categorized as members and non-members. To be categorized as a member, the individual had to attend membership classes for multiple weeks during the Wednesday evening church services. As a member, you could attend "members only meetings" where personal information was shared about and with members. Only members could attend the annual finance meeting. Members were also required to enroll their children in CCA.
69. Once an individual became a member, they were completely accountable to all internal leadership and were required to give their tithes and offerings for the

remainder of their attendance, but also officially felt accepted into the community. “The Prosperity Gospel” message was foundational to the teachings around giving. The core beliefs of said “Prosperity Gospel” were that the more you give the more you will be blessed, and God wants us to live a very prosperous life. K. Johnson used this message to justify using the offering money to buy himself multiple Lexus vehicles and a large house on an acreage near Hague, Saskatchewan, while being aware that multiple families were struggling to afford their basic needs.

70. Tithing was taught as a prerequisite to God's blessing in your life. Tithing meant giving ten percent of all gross income received in an offering to the Church. All other offerings were expected to be in addition to your regular tithes. It was common for people to be confronted or punished for not tithing to the Church and any future struggles were blamed on your “stinginess”.
71. The offering process at the Church was not the typical passing of a bucket while everyone remains seated. Instead, congregants would all stand, pray over our offerings, then the whole congregation would make their way up to the buckets on the stage in a very orderly, row-by-row, single-file fashion. This way, K. Johnson and the rest of the congregants could see who was giving and who remained standing in their pew. He would turn around and scan the whole room during this time, seemingly taking mental notes of the same. On multiple occasions, I recall dropping an empty envelope into the bucket because I did not have money but also did not want to be frowned upon or ostracized for not giving. There were also offerings in every children's church class as well, where children as young as 3 years old were expected and/or guilted into providing offerings. The act of giving was enforced as a way of life that would guarantee our future prosperity.
72. All of life's milestones were celebrated in the Church, such as baby dedications, baptisms, being "saved/born again" (accepting Jesus into one's heart making them a Christian), weddings, and funerals.

73. I remember watching peers perform a dramatic dialogue in drama class at CCA and at church services multiple times throughout the years. As an example, I recall one dramatic recreation where there were two friends that got in a fatal car accident, one of them being a Christian, who told a detailed and horrific story of one friend being dragged to hell by a demon while the other was led to heaven by an angel, and the image it left in my mind was piercing. The main message was to evangelize to everyone you loved so that they could also spend eternity in heaven when they passed away, as opposed to the eternal torture in hell for sinners.
74. It was common for healthcare professionals to be criticized in sermons, even with multiple members, being healthcare professionals, sitting in the congregation. Prayer and miracles were presented as the end-all cure rather than medical investigation and treatment. If miracles or healing were not successful, it was because something in your life was acting as a barrier, including a lack of faith.
75. Students at CCA and/or congregants of the Church were instructed to prioritize their relationships and responsibilities in the following order, from most to least important: God, the Church and its leaders, male head of the family, the rest of the family members, and lastly, employment. I remember K. Johnson saying, "if you're too busy to come to church, then you're too busy!", in reference to individuals' work schedules. People were expected to miss work to attend at the Church but were simultaneously expected to give substantial financial offerings to the Church incessantly. K. Johnson took a mental note of who attended the Church services and sometimes would approach people to investigate the cause of their absence if he noticed they were not coming as regularly as expected. K. Johnson had an extreme superiority complex and acted as though he knew what was best for every single person that he encountered.
76. We regularly heard preaching from the New Testament book of Revelations about being in the end times, referring to the era just prior to the imminent second coming of Jesus to earth. Christ's actual return is referred to as the "Rapture", in which all

Christians will meet Jesus and ascend into heaven. The completion of the Rapture signals the beginning of the "Tribulation period" on earth for all the remaining sinners. The Tribulation period would be 1,000 years of Satan's full reign on earth. Guest speaker Joseph Morris visited the Church multiple times throughout the years to preach on this topic.

77. Some of the other foundational beliefs that were commonly indoctrinated in the students at CCA and/or the congregants of the Church, which underlined all operations during my time at CCA and/or the Church, can be summarized as follows:

- a. Mankind is innately born with a sinful nature full of carnal desires "of the flesh" and in need of the Saviour Jesus Christ. This was successful in pitting individuals against their natural instincts, needs, and desires. This had a lasting impact on one's self-awareness skills, which are crucial for leading a meaningful life.
- b. One becomes "born again into a new Godly nature" by verbally asking Jesus to "come and live in their heart" for the remainder of their earthly life. You were now considered a Christian and "written in God's Book of Life", which held the names of everyone he would let into heaven for eternity after they shed their "earthly suit" via physical death.
- c. One can complete their Christianity by becoming "filled with the Holy Spirit." This is done by verbally asking God to fill your heart with the Holy Spirit. Confirmation of completion is the individual's newfound ability to "pray in tongues," which sounds like, and is, gibberish.
- d. All Christians were commanded to evangelize to expand God's heavenly kingdom here on earth in an attempt to save their souls from eternal damnation in hell with Satan and his demons.
- e. Any sin would push you out from "God's umbrella of protection," which is only above those living in God's will and purpose for their lives. This was

regularly used as a threat by leadership. It also served as an explanation for anything negative that happened to anyone living in sin.

- f. Illness was also portrayed as a result of sin, even illness that was passed down generationally. Some parents with special needs children were told that their child lives that way because of sin in their (the parent's) life. At times, the "sin" was being a single parent.
 - g. There is a Judgment Day with God in the afterlife in which he will analyze every thought, decision, word, and action of yours and decide if you will spend eternity in heaven or hell. This was the biggest drive to living a life acceptable to God.
 - h. Christianity is "The Way, The Truth, and The Life," being the only way to heaven. Every other belief is simply wrong and idolatrous.
 - i. Christians were to marry other Christians only, or else you would be "unequally yoked," which was a sin. Marriages were to remain monogamous, and we were taught that divorce was an extremely shameful act, especially for women.
 - j. All wives were to faithfully submit to and serve their husbands, since the husbands were superiors as the head of the home.
 - k. Females were responsible for protecting the men's purity of mind and actions. Any sin in a female's life was her fault, no matter what happened.
 - l. Parents were to "train up their children in the ways of the Lord, so when they are old, they will not depart from it." K. Johnson's Manual was to be used as a guiding text next to the Bible to train kids. The goal of discipline was to break the child's will and rebuild them up to be Christ-like.
78. The above foundational beliefs were indoctrinated in the students at CCA and congregants of the Church through the policies at CCA, by K. Johnson repeating these

beliefs in his sermons and throughout his written materials that we were required to read.

Specific Instances of Abuse

79. The list of things that I have struggled with personally from the harmful environment that I grew up in is painfully long, and therefore, I will only be describing some of the more significant components I remember experiencing during and after my time at CCA and/or the Church.
80. I remember being in the change room at CCA, changing into my gym uniform with fellow students, and a classmate showed us severe bruising on her hamstrings. She indicated that the bruising on her legs was as a result of her bottom being missed when she was paddled. I remember thinking about how seriously painful the bruising looked. I empathized with her because I had a similar experience in the past, and knew of several other peers that did as well.
81. I observed numerous instances where my peers, were taken to the office on multiple occasions to be subjected to paddle-induced discipline. Sometimes, it occurred several times a week. I was aware of this discipline because they always returned to class visibly distressed and some of my peers explicitly recounted the experience to me on occasion, and I verily believe such recounts to be true.
82. I have a memory that has stuck with me since I was about ten years old. My younger brother and I were playing soccer in our backyard when he unexpectedly burst into tears upon the realization that our late grandfather was not "saved," and therefore, he was suffering in hell for eternity. I will never forget how hard it was seeing him so upset at this thought. This is an example of the emotional strongholds established by the Church and/or CCA in children at a very young age.
83. I found it extremely difficult to process the sudden disappearance of friends and family who left the Church and/or CCA, especially when I was a child. I could never

wrap my mind around why we were expected to prioritize the needs of the Church and/or CCA above the needs of our own families. This did not feel like the Christ-like love we were told to show people. I know of multiple people and family units that decided to move out of the City, Province, Country, or Continent to reduce the chance of being exposed to triggers related to their experience at the Church and/or CCA.

84. In January of my grade 8 or nine year, I remember fainting onto the steps leading up to the stage at the front of the sanctuary during an early morning Tuesday prayer service. I remember being very tired, getting really hot under the bright lights, and standing for a prolonged period of time after the praise and worship had finished. Even though I started getting light-headed and tunnel vision, I was too scared to be a distraction to everyone by leaving the room. I then blacked out and was lying face down on the steps when I regained consciousness. My mom took me out of the service and got me some juice, and then I returned to the prayer service once I was feeling better.
85. The ties between CCA and the Church to the Conservative Party have always been strong and proudly publicized. R. Donauer served in the Church as K. Johnson's right-hand man, and he was conveniently involved in civil politics as the Ward 5 Councilor during my time at CCA and the Church. I remember multiple school days being used for political flyer drops in the north end of Saskatoon. Students were split up into groups and loaded into a school van or a volunteer parent's vehicle, with one or two supervising adults and a neighborhood map. Our group would then attend the assigned neighborhood and drop off Conservative flyers in every house's mailbox. After we spent the morning working as minor political agents, there would be pizza and pop waiting for us at CCA. There was no compensation or lenience given for lost school time; our educational targets and goals remained the same. R. Donauer has admitted to inappropriately recruiting CCA students during school hours to deliver campaign materials to advance his political interests. R. Donauer made these admissions to CBC News and a copy of the CBC article dated August 8, 2022, where the same is discussed

is attached hereto as **Exhibit “C”**. R. Donauer continues to run for city councillor and is currently serving his third term on the Saskatoon City Council at the time of writing.

86. As a student at CCA and a minor congregant of the Church, I was very active in extra-curriculars, including music, drama, and athletics. I recall two occasions where our high school choir was invited to perform at the fall opening of the Legislature in Regina. After one of these performances, the group of us CCA students were invited into the office of the premier at the time, Brad Wall, for some refreshments before our trip back to Saskatoon. I remember feeling like we were so special.
87. The Church and/or CCA always believed in signs, wonders, and miracles. I have a memory of someone who was wheelchair bound for as long as I can remember, receiving prayer from a minister during prayer time after the sermon. She was in front of the whole congregation as the minister asked God to heal her. She was told by the minister that she was going to physically walk out of the service that night. The anticipation in the air in the Church that night was tangible. She remained at the front of the room with an usher on either side of her as the preacher moved on to praying for other people. I remember watching her desperately try to stand up out of her wheelchair multiple times, but she never succeeded. She was asked if she felt any improvement the next morning, and she declined but said that she still had faith that it would come. Even as a child, I could feel the pressure to be healed. On one hand, you had everyone watching you, and on the other, you were blamed if you were not healed. There was a high potential for social humiliation. This woman remained in her wheelchair for the rest of the time that I saw her around. There was a very similar story with a legally blind person that experienced no improvement in her vision.
88. I can also recall the use of the commonly used leg lengthening illusion. A preacher would have someone sit in a chair with both legs extended straight out. The preacher would point out a small difference in leg length. The preacher proceeded by praying

and asking God for healing, and then would pull the individuals leg or reposition the shoe in a way that looked like the leg was actively growing right before our eyes.

89. In June of 2010, tragedy struck the community at CCA and the Church. I will never forget learning that the older brother of one of my close friends had been tragically killed in an accident that was witnessed by multiple people, including children.
90. The younger sister of the victim and Robynne Randall (who were present at the time of the incident) told me that the people who had witnessed the death were not offered any professional help afterwards, and I verily believe that to be true. His family and the leaders of the church he attended decided to hold an around the clock prayer meeting for days on end following his death. Everyone was told by J. Randall to pray and believe that he would be raised from the dead. I attended one day of prayer for this purpose. There was no other reality offered. We were never to talk as though he was not coming back from the dead. I was informed in more recent years by Caitlin Erickson and Robynne Randall, and believe it to be true, that the family requested his body from the morgue so that people could lay hands on him in prayer. That request was not granted.
91. Approximately one week after his passing, the parents told everyone that their son had communicated to them from heaven and that he wanted to stay there with Jesus. That was the only time in which they began to think about life without his physical presence being here on earth. There was a celebration service held at his church, but grieving was verbally discouraged. We were to strictly celebrate his life and be happy about his reunion with God in heaven. I attended some of the prayer service and the celebration service. I remember feeling extremely internally conflicted during my time at both services. I wanted to cry and grieve with my friend who had just lost her brother, but that was frowned upon by those in positions of power. This is a great example of how natural processes, like grieving or receiving professional therapy, were mishandled and replaced with a forced spiritual explanation.

92. I was groomed and sexually assaulted by A. Benneweis on numerous occasions between 2008 (age 13) and 2012 (age 16). Throughout this time A. Benneweis was 32 to 36 years old. He was married and had two children. As aforementioned, A. Benneweis was the athletic director at CCA, in addition to being the coach for the senior boys basketball team and the high school track team, both at CCA.
93. I began playing on the senior girl's high school volleyball team at CCA when I was in Grade 8, a year early. CCA used to have a week at the end of the summer that they called "Fall Camp". During Fall Camp, all of the high school students would stay in the school building for an entire week (including overnights), and the students would participate in sports and devotional meetings all day, followed by services in the Church every night. At the end of Fall Camp, the volleyball and basketball teams would have alumni games where fans were welcome. I remember warming up for this alumni game and noticing that A. Benneweis was intensely watching me as I warmed up. I caught his eye a lot and he would not look away when I did. He would maintain eye contact for a second and then would grin, wink or bite his lip. This alumni game took place on my thirteenth birthday.
94. These encounters, whereby he would stare at me, and eventually grin, wink, or bite his lip, became more commonplace. A. Benneweis' office was on the second floor of CCA and he had a window in his office that overlooked the gym. He would usually have his blinds down during gym classes or volleyball practices, but I started noticing that he would lift a single slat of his blinds and watch parts of our volleyball practices. Once again, he would keep watching and grin, wink or bite his lip when I would notice him watching. Sometimes he would walk through the gym during practices, seemingly just to get a closer look at me. He frequently told me that I was the best volleyball player on the girls' volleyball team, which was a big deal because the staff and/or leadership at CCA and the Church rarely gave compliments or praise.

95. A. Benneweis also taught my gym classes as a younger teen, for grade 6 and 7, and I would feel him staring at me throughout the class. I remember thinking that his stares would increase in frequency and intensity if I had a tan from a family vacation. This process of him staring, smiling, and then winking at me or biting his lip started happening in the hallways and in or around his office. He would give me “the eyes” during track practices, and I would catch him staring at me in the rearview mirror of the school vehicles when we were going to and from sporting events and/or practices. I also babysat his children on occasion, and he would drive me home alone after him and his wife returned. I remember A. Benneweis leaving me little drawings and/or notes in my new workbooks that I left on my desk as a reminder of his interest in me.
96. He began calling me into his office to talk to him, sometimes with friends, though eventually almost always alone. He would tell me stories from when he was in school or talk about track stuff, essentially anything to keep me in his office. He then began asking me to meet him in secluded rooms around CCA and the Church during school hours, where he would talk to and hug me, and tell me where I could meet him the next time. Reflecting back, I recognize that he did this for a brief period to warm me up to the idea of him wanting to meet outside of CCA and/ or the Church.
97. When I was fourteen years old, A. Benneweis began asking me to meet up with him outside of the Church and/or CCA. The first time occurred when A. Benneweis was training for a triathlon, and I was in high school at the time. I was walking by his office one day after school when he pulled me aside and informed me that he was going to be running that evening, and he asked if I was going to be running for my own track workout. I told him that I was planning on going running and he asked me if we could meet up at a certain spot in a park in the north end of Saskatoon. I hesitated as I was surprised, confused and scared to go against or disappoint someone in a position of authority. Multiple members of my immediate family were also closely tied to him, which significantly added to the pressure I was feeling. I was afraid that my life would be made a living hell if I disagreed due to how interconnected our

families were, and because I had to walk by his office every day at school to get to my classroom. I saw him every day of the week, either at CCA or the Church. Out of fear, I agreed and we met up later that evening. When we met up, he held my hand romantically while we walked behind a tree line in the park. He made me promise that I would keep everything a secret, no matter what, because his family life and career depended on it. He made me believe that it was my job to keep his life together by swearing to secrecy. Again, I was fourteen at this time.

98. A few weeks later, we met up again at the park behind the Lawson Heights Soccer Center. This time he brought the school van and parked it on a nearby residential street. He told me that he was going to walk around and park the van at the end of the nearby catwalk, and instructed me to walk around the other way to the catwalk and meet him in the van. I got into the van and he instructed me to lay down on one of the bench seats in the back to avoid being seen, and he proceeded to drive to the Marion Graham school parking lot. There is a small hedge border between the parking lot and the street. He parked the van and climbed back into the first bench seat and got me to sit on his lap. He was leaning back against the window with me sitting on his lap and leaning back against his chest, and he wrapped his arms around me. I remember him saying excitedly, "Holy lick! I am holding you!". He proceeded to put his hands on my shoulders and turn me around so that I was facing him. He began to passionately french kiss me on the mouth and this lasted for approximately 1 – 2 minutes. This was the first time I had ever been kissed. I froze and was clueless as to how to respond while it was happening to me. I remember feeling extremely uncomfortable and scared to push back against authority in any way. I let it happen and soon enough it was over. I turned around so that I was facing away from him, and he held me for a little while longer before he dropped me off a few blocks away from my house so that I could jog the rest of the way home. I was never the same after this incident.
99. I remember attending the track provincials in Moose Jaw in 2010, and A. Benneweis began to lead me out of the track grounds for some alone time. Thankfully, my parents

were arriving at that moment, so we greeted them and walked into provincials with them instead.

100. A. Benneweis called me into his office and sent me home with a plastic bag of clothes that he asked me to wear when meeting him in the family change room of the Lawson Heights Civic Centre. I only opened the bag when I got home, and I discovered that the bag was filled with clothes that were all black mesh. I was immediately shocked and felt extremely uneasy. I closed the bag and did not take anything out of it. I returned the bag to his office and told him that I could not do it.
101. Another place that A. Benneweis would request that we meet up was a grassy area that overlooked the river on Capilano Drive. He asked me to ride my bike there, so I did. He hid my bike in the bushes, and we laid on the grass, staring into the sky as he held my hand. A plane flew over us and he asked me, “if we could go on a vacation together anywhere in the world, where would you want to go?” He started vocalizing this vacation fantasy and what the logistics of the same would look like. He knew that it could never happen, but by vocalizing it, I was forced to imagine it too. The idea of going on a vacation together made me feel very uncomfortable.
102. A. Benneweis did summer renovation and/or construction jobs, and he told me that he was going to be working at a house in the north end and requested that I meet him there. He gave me the address and told me what day and time, and I rode my bike there. I arrived and met him in the backyard where he was working. We immediately left in his car. I was in the passenger seat, with the seat dropped all the way back to avoid being seen from the window. He drove us to the end of Adilman Drive and parked at the end of the street. I followed him down towards the riverbank where there were bike paths in the trees. He found a secluded spot on a path and he began to hug me once again. He then began feeling me up, all over my body, on top of my clothes, with his hands, including my back and butt. He started to slowly lift my tank top and suggested that I take my tank top and shorts off. I did what he requested and he began

to passionately make out with me. I stood there in my bra and underwear, and he continued to rub his hands all over my body, including my back, butt, stomach, breasts (over my bra), my neck and face while he was also kissing me. If he had any desire to hide his boner, he did not make that obvious. I put my clothes back on as fast as I could, and on the way back to his car he pointed out that my tank top was on backwards and inside out. My internal panic was so strong in the moment that I could not even put my clothes back on properly. I remember thinking that I would never be able to be proud of myself or my life ever again after this incident. I felt dirty, used and full of shame. I thought I was going to have to shoulder these deep dark secrets forever. He drove me back to the house he was working on and I rode my bike home. I did not know it at the time, but my family and I ended up moving to Adilman shortly after this incident.

103. Our school used Accelerated Christian Education (ACE), which hosted an “International Student Convention (ISC)” every year in the United States as a gathering for art, drama, athletic, and music competitions. CCA high school students attended this convention every second year. A. Benneweis was the CCA staff member that came to manage the athletic events at the convention. In the spring of 2011, several CCA high school students and a handful of select staff members from CCA loaded onto a greyhound bus and travelled to the United States for approximately 10 to 14 days. On one of the travel days, A. Benneweis pulled me aside and told me to pretend to forget something on the bus after everyone was settled in their hotel rooms that night. As always, I followed his direction and did exactly what he requested. When I got to the bus and walked up the stairs at the front of it, I saw A. Benneweis come out of the bathroom at the back of the bus. I thought this was strange as we used the bathroom as storage on the trip and we were not allowed to use it. As he was coming out of the bathroom, he put a wrapper in his pocket. I had no idea what it was at the time, as I did not know what a condom was or what it looked like. He approached me with a big smile. I remember him saying a few things to me, but

nothing physical happened this time. I cannot recall why nothing physical happened, but I believe someone from our group may have walked out of the hotel. I just remember aborting the bus in an urgent, but calm manner, so as to avoid looking suspicious.

104. I remember being on campus at the convention, and I had just finished a choir rehearsal in the big auditorium where we would perform. I went out into the hallway to fill my water bottle, and A. Benneweis approached me and said, “on a scale of 1-10, how crazy do you want to get?”. I froze and all I could think was, “What? What scale? What was 0 and what was 10? Does he have limits or boundaries? Is he serious?”. I did not understand his question and I do not remember how I replied. All I remember after his comment was how I felt, which was confused, offput and very nervous.
105. In 2012, the provincial track meet was hosted in Saskatoon at Griffith’s Stadium. I did not qualify for provincials that year, so I helped with the officiating. A. Benneweis was also helping officiate, and he was the person that recruited me to come and help with the event. At lunch time, he requested that we go back to his house in the school van. I got into the van and laid down on one of the bench seats in the back of the 15-passenger van. He drove me to his house and led me inside to his bedroom. His wife and two children were not there. He directed me to take off my shirt and shorts, and told me that he would be right back. He went into the ensuite bathroom for a couple of minutes and came out in his boxers with a smile on his face. I nervously stood at the foot of his bed in my underwear. He approached and then proceeded to make out with me. It did not take him long to push me back onto the bed. I was laying on my back and his body was on top of mine as he continued kissing me. His hands wandered all over my body from my thighs to my stomach, my breasts (on top of my bra), my shoulders, up my neck, and to my face. Then he reached behind my back and started to play with the clasp of my bra. He never undid my bra, but it felt like he was contemplating it. I remember laying there being kissed and thinking, “this might be

the day that I have sex for the first time.” I was horrified and I felt paralyzed in that moment. I was only sixteen years old at the time. After a while of toying with my bra, he suddenly stood up and said, “we’re done”. It ended right then and there. He went back to the bathroom to get dressed and I put my clothes back on. We drove back to Griffith’s Stadium and continued on with the afternoon as if nothing happened.

106. Towards the end of the school year in 2012, I was walking to my classroom and A. Benneweis called me into his office when I was walking passed it. I was standing in the doorframe of his office, and he had the audacity to ask me, “how is your relationship with God doing”? I broke down crying and said that it was going nowhere, and that I felt so stuck. Then my mom walked by and she was caught off guard when she noticed I was crying. I walked away from his office and she walked in to talk to him. She never asked or talked to me about this interaction afterwards.
107. I helped set up the gym for the graduation celebration at the end of the school year in 2011. My mother was in charge of the setup and A. Benneweis was a handyman that helped out with the same. I remember A. Benneweis waving me over when the gym only had the house lights on. He told me to meet him in the drama room upstairs at a specific time that afternoon. School was already out for the year, so there were significantly less people in the building at this time. I went upstairs to the empty drama room when the time came, and all of the lights were off. There was a couch shoved in the corner of the room and A. Benneweis was sitting on it. I sat on the couch beside him without saying anything. He then said “Okay, two minutes and I can do whatever I want to you, the next two minutes, you can do whatever you want to me.” It was so quiet in the room that all I could hear was the clock loudly ticking. I believe I may have focused on the ticking clock in an attempt to disassociate from reality during this incident. He started to make out with me as he sat next to me, and then shortly after he began, he stood up and straddled my lap facing me. He was sitting on my lap, facing me, and continued to heavily make out with me. I could feel him rubbing his boner against me. After a couple of minutes, he stopped, sat back down, and told me

that it was my turn. I was so uncomfortable and did not know what to do, so I replicated what he had just done to me and nothing more. I straddled his lap and kissed him, just wanting it to be over, and soon enough it was. He got scared that someone would walk by or into the room, so he wrapped it up and we returned to help decorate the gym.

108. When I was seventeen years old, I told my best friend, Kamea Fenez, that something was going on between A. Benneweis and me, and she did not appear surprised. Kamea then decided to share this information with another friend of ours, Desiree Pearce, and I was advised by Kamea and Desiree, and verily believe it to be true that, Desiree shared the information with her mother, and her mother then told the pastor, K. Johnson, and his wife T. Johnson. I was then called into a meeting with K. Johnson, T. Johnson and my parents. I provided absolutely every detail to all of them in K. Johnson's office, and it was one of the most shameful times in my life. Immediately after I finished talking, there was a few seconds of silence and then K. Johnson said "Obviously we have to file a police report. Will you lie about your age and say that you were older?". This suggestion to lie to the police was the first response I received when I finally found the courage to disclose the abuse that I had suffered at the hands of someone in a position of trust.
109. A. Benneweis got fired the next day, but I still had to see his wife and two children around CCA and the Church until the end of the school year. The day after that meeting, my mom and I were not allowed to attend CCA, and we went to the police station to make a statement. K. Johnson adamantly instructed my parents and I to say that the abuse only started when I was sixteen and that we were to be gracious towards A. Benneweis by not pressing any charges against him. The reality was that A. Benneweis started abusing me when I was thirteen years old and he was 32 years old. The abuse was frequent and ongoing until I was nearly 17 years old and I had the courage to share what was going on with a friend of mine. My family and I listened

to the direction of the head pastor, and we did not press charges against A. Benneweis in 2013.

110. After not pressing criminal charges against A. Benneweis as a teenager, the pain and the trauma from the sexual abuse at the hands of A. Benneweis continued to weigh down on me into my adult years. As a teenager, I was not equipped to be able to understand the severity of what I had gone through. These realizations started coming to me as an adult, and then especially when I became a mother. My maternal instincts kicked in, and I could not handle the fact that A. Benneweis was not being held accountable or responsible for his extremely harmful behaviour. This was eating away at me because I felt as though I was the only one that was having to live with the consequences of his abuse.
111. When I got engaged at 18 years old, I told my fiancé about what A. Benneweis had done to me. He was utterly shocked and disgusted, but it was aimed at me. He did not talk to me for three days straight and told me that he was deciding whether he still wanted to marry me or not. I felt like I was drowning in shame for those three days. He decided to marry me anyways, but I felt incredibly dirty and gross for what had happened to me. This is the marriage my daughter was born from.
112. After my now ex-husband and I split, I started to contemplate what my life had come to and how I got there. This is when I really started to dig deep into questioning my experiences with the Church and CCA, and religion in general. I began to deconstruct everything I had been taught and told, and deeply question it. Eventually, this led to me questioning why A. Benneweis was never charged, despite so many adults in my life, most of which were considered as “leadership”, were aware of his behaviour. This included me telling K. Johnson, the head pastor, and his wife, T. Johnson, but they never did anything to hold him accountable, and instead, tried to silence me. This is when I decided that I would take the matter into my own hands and press charges. So, on August 10, 2022, I went to the Saskatoon Police station and pressed charges myself.

113. A. Benneweis pled guilty to committing numerous sexual assaults on me contrary to Section 271 of the Criminal Code. A. Benneweis also pled guilty to touching my body, directly or indirectly, for a sexual purpose, while being in a position of trust or authority to me, a then young person, contrary to section 153 of the Criminal Code. On January 18, 2024, A. Benneweis was sentenced to 729 days incarceration, which was two years less a day, and subject to probation for a period of three years upon his release.
114. Mike Walters was the government official that was placed in CCA to supervise the activities and conduct in CCA in the recent years, since this proposed class action has become public. After contacting Mike Walters to obtain my cumulative file from CCA, he began interacting with me in unusual ways. I met him at City Perks to retrieve my cumulative file, and upon hearing my story of sexual abuse at CCA, he started crying and holding my hands for emotional support. I felt very awkward during this time. Mike Walters then started texting me regularly, began sending me selfies (pictures of himself) over the Christmas break, and invited my daughter and I over to his house for movies and drinks on multiple occasions, which I never wanted or accepted. This exacerbated my existing distrust in figures of authority as I started feeling similar feelings with Mike Walters as I did with Aaron Benneweis, both of whom took advantage of my vulnerability.

CCA and the "ACE" Program

115. 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.
116. Only a very select few of the classroom supervisors or monitors were licensed, regulated teachers. Instead, the majority of them were unqualified parents from within the Church and/or CCA community.
117. In my years as a student at CCA, the classrooms were called "levels" and were divided as follows:

- a) Kindergarten;
 - b) Levels 1 and 2 in one classroom (Grades 1 and 2);
 - c) Level 3 (Grades 3 and 4);
 - d) Level 4 (Grade 5);
 - e) Level 5 (Grades 6 and 7);
 - f) Level 6 (Grades 8 and 9); and
 - g) Level 7 (Grades 10, 11 and 12).
118. Each classroom had approximately 20 to 30 students with one supervisor and one monitor. Students sat and worked in individual cubicles with large dividers between each desk so that students could not see each other while working. The cubicles lined and faced the walls, and all forms of communication between students, including looking at each other, were strictly prohibited in the classroom during working hours unless permission was given by a staff member for a specific purpose. Photos of the setup of the Classrooms at CCA that were taken from various yearbooks are attached to Caitlin's Affidavit as Exhibit "I".
119. CCA used Accelerated Christian Education ("ACE") self-study workbooks, called "PACEs", as well as Saskatchewan Association of Independent Church Schools' ("SAICS") self-study workbooks, which we habitually called "PACEs" as well. ACE was used from kindergarten until high school, and SAICS curriculum was used for high school core subjects.
120. ACE is a complete, self-instructional curriculum that integrates Bible truths and character values throughout all subjects and grade levels. Biblical principals and concepts are interwoven into all aspects of the program. Science is taught from the biblical perspective of creation. The curriculum mainly consists of PACEs typically around 40 pages in length, each of which takes a student approximately 2 weeks to complete.

121. Both ACE and SAICS materials required students to independently follow a reading guide and then answer questions in their workbook at their own pace. After completing sections in the workbooks, the students were responsible for marking their own work with provided score keys. "Scoring" our workbooks happened while standing up at a "scoring station," which was comparable to a standing desk big enough for 6 students to stand at simultaneously.
122. Courses were not teacher taught and there were no alternatives offered for any special needs. If a student did not perform well in this system, they were blamed and punished rather than supported and encouraged. Bible verses were laced throughout the workbooks, and students were required to commit them to memory and recite them to staff members weekly as a component of workbook completion .
123. The expectation in the classroom was that students needed to be silent, remain facing forward towards the wall and in our chair at all times, not communicate with other students and to always follow the rules. We were isolated. These rules were consistently reinforced by both the code of conduct that was hung on the wall at CCA, and the ACE program booklets that students worked on.
124. After students independently completed a portion of questions in their PACEs, they were also required to independently utilize score keys located at an open "scoring station" in the middle of the classroom. If a student had a question at the scoring station, they would silently raise their hand and wait for a staff member to come assist. If we had questions while working at our cubicles, we were to raise a 6-sided cube that had pictures on each side indicating the subject of our need for assistance.
125. There were two to three "checkups" to be completed, based on memory alone, after each section in the workbooks. We had to complete a "self-test" on the entire workbook once all sections were completed. Upon passing the self-test, we had to complete the "PACE test" the following day, which gave you your official mark for that workbook. All tests were closed book, with self-tests and PACE-tests being

completed at an open table in the middle of the classroom so the staff could serve as live proctors.

126. All of the above-mentioned tests contained the exact same questions that were included in the materials themselves using the same wording and format, with the same expected answers. Therefore, rote memorization was the key to success in this program, not critical thinking or practical application of the concepts discussed. I was able to achieve good marks in high school because I am good at memorization, but the overreliance on rote memorization during my time at CCA prevented me from developing any useful study skills. This has made my current pursuit for a nursing degree challenging to navigate. My learned skills at CCA did not translate into real life very well.
127. CCA completed what were called "PACE checks" at least once a school year. Staff would select one completed PACE from each student and put a white mailing label over the name on the front, which did not always completely cover the name. The PACEs would be handed out to another student along with the score key, and each student would re-score another student's PACE. Varying degrees of punishment were inflicted upon students if errors were found in their PACE. 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 many of us knew that we were the indirect cause for that student having to endure a punishment. This caused bitterness between students at times.
128. All students were required to wear a specific uniform and parents had to purchase all uniform pieces for every child attending CCA, in addition to paying tuition. The uniforms consisted of brand name dress clothes and dress shoes, which were not cheap items to purchase. The boys' uniforms were purchased from Atch & Co and the girls' uniforms were purchased from Lands End. We were also required to purchase gym uniforms, sweater vests, and long sleeve fleeces from CCA, that were all embroidered

with the CCA logo. The cost of purchasing all of the pieces to the uniform was significant, and it was not a one-time expense as parents would be expected to purchase new uniform pieces as their children outgrew them.

129. Boys were to keep their hair within a 2" maximum length, with no hair touching their ears. All shirts had to be tucked into their dress pants, preferably with a belt. All belts and shoes had to be black. Boys were also prohibited from having or wearing any piercings, make-up, tattoos, extreme hairstyles or dyed hair. We were told cleanliness is next to godliness, and that we were representing Jesus everywhere we went. A neat, conservative appearance was the required ideal
130. Girls were prohibited from dyeing their hair any unnatural color, and from wearing any hair styles that the staff would deem bold or extreme. Only one earlobe piercing per ear was allowed, and the earrings could not be "loud" or any larger than a nickel. No other piercings were allowed. We also wore assigned dress clothes, which included culottes, black dress shoes, skirts, dress pants, nylons, blouses, and fleece vests/sweaters, as a uniform daily. Gym uniforms were unisex cotton t-shirts and mid-thigh to knee-length cotton shorts.
131. Females were instructed to hide their bodies K. Johnson and the staff at CCA and the Church. Girls were criticized on the way they walked and how they sat, both of which were perceived as ways in which a woman could increase their desirability. Rather, women were prohibited from "carrying themselves" in a way that could be viewed as attractive. Otherwise, you may be accused of being and labelled as a "slut", "temptress", "vain", or "a stumbling block" causing others to sin.
132. There was a "6-inch rule" enforced, which meant that male and female students were to always remain at least six inches apart. This was an attempt to prevent students from developing or showing any attraction or affection towards the opposite sex, since this would "open the door to the spirit of lust" leading to the terrible "sin of sexual immorality". This information was provided in the ACE booklets.

133. Students were not permitted to date, unless the relationship was pre-approved by K. Johnson, which was rare and mostly involved favored individuals, or was the result of leadership trying to match-make.
134. I can clearly recall the feeling of shame that was attached to all natural developmental processes. This was especially true around the topic of sexuality. There was no sex education taught at CCA or in any youth group. As for reproductive anatomy, I had three PACEs throughout my entire education at CCA that taught us about basic reproductive anatomy and a few of the functions. The accompanying process of sexual relations was skipped over to avoid students from having sexually immoral thoughts. Regarding interactions between opposite sexes, my youth pastor taught us student, "if you would not do it to your grandma/grandpa, do not do it to anyone of the opposite sex". Education around this topic was extremely lacking, and there were no discussions on the topics of safe sex or consent.
135. Growing up in the Church and CCA, sex was a taboo topic, no education on safe sex or consent was ever provided and there were strict prohibitions on dating or fraternizing with the opposite sex. This left me in an extremely vulnerable position where I could easily be taken advantage of, and I was essentially a prime candidate for a sexual predator.
136. As students, we were expected to help with the setup and teardown of events hosted by either the Church and/or CCA, always without compensation and sometimes at the expense of our school time hours. Thus, we would have to make up for missed school time during the minimal personal time we had so as to be able to continue meeting the same academic goals with significantly less opportunity to complete these goals during school hours.
137. K. Schultz publicly made statements over the decades proudly declaring that the priority of CCA was character development and not quality education. Meanwhile students were incessantly subjected to significant levels of pressure, intimidation,

discipline, and multilevel abuse, while being expected to perform with excellence at all times. We were always told to be on our best behavior for guests, which occasionally included politicians.

138. The Church and CCA would host an annual Christmas auction in the gymnasium, which served as a significant fundraiser for the Church and CCA. CCA and Church staff, as well as attendees, would contact local businesses and acquire donations for the Christmas auction. The gymnasium would have various displays set up to show the auction items. The CCA students would perform music at this event, and we were also expected to be workers at the event, which included serving food, waiting on tables, working at a drink booth, and being general runners for anything needed during the event. Students were never compensated for their time serving at this event, or any Church or CCA event held. The Church and CCA leadership invited as many guests as they could, and this event turned into a major event that brought in significant money. School music classes were spent practicing for this event, and we were heavily encouraged to look our absolute best and be on our best behaviour because we were on display for all to see. I remember times where politicians would attend, such as city councilors, MPs, and Brad Wall, the premiere. It was clear to us students that we were required to carry ourselves as if we were in performance mode at all times.
139. There were groups of students that were required to do flyer drops for our conservative politicians during school days and I was included in one of these groups. A few staff members would drive CCA's 15-passenger vans, full of students, to assigned neighborhoods where we would leave flyers at each house. R. Donauer was a key player in coordinating and executing these events. We were openly advised to vote conservative because it was believed all other political parties were part of the devil's plan, and we would even spend time collectively praying against the other parties' success.

140. The Church held quarterly "special meetings" during which a guest minister, chosen by K. Johnson, would preach for five consecutive days. This was treated as a very significant time for both the Church and CCA. During these five days, there would be special meeting church services on Saturday evening, Sunday morning, Monday morning and evening, Tuesday morning and evening, and Wednesday morning and evening. Special meeting church services typically lasted longer than the regular church services, which already lasted for multiple hours.
141. During these special meeting church services, the CCA high school students collectively left the classroom for multiple hours of school time to attend the morning sermons. We were still expected to attend all other services as well, in addition to keeping up with our academics and extracurricular activities. Students, including myself, lost six to eight hours of school time to the three morning sermons alone during these weeks. Our academics were entirely independent and self-directed (discussed in more detail later herein), and the goals and expectations for our academics during these special weeks did not change to reflect our significantly shortened school day. These special weeks were exhausting. The only flexibility given to the students in the schedule was starting school one hour later on the Thursday mornings following the late night "special meetings". Students, including myself, would then be quizzed on the sermon topics in the Church, and these quizzes were usually created based on a select few students' notes that were chosen by the quizzing staff members.

Expectations Around Post-Secondary Education

142. Attending university was discouraged by all staff and leadership at CCA and the Church because it commonly led to people questioning the teachings and methods inside CCA and the Church.
143. While I was growing up in the Church and CCA, students, including myself, were told that it was mandatory for us to attend the internally run Bible school, FCI, upon

graduation at CCA. We were told that attending FCI would “prepare us for the evil influences out in the world of sinners”. In the early 2010s, the expectation of CCA and the Church that students were to attend FCI changed from mandatory to highly recommended which was communicated to everyone by the staff at CCA and the Church.

144. Despite the suggestion that attending FCI was only highly recommended as opposed to mandatory, the students who chose not to attend FCI were treated as lesser than the ones who chose to attend. They were portrayed as having a bad attitude, rebellious spirit, and were at risk of "backsliding", meaning to turn your back on your Christian beliefs. Backsliding was seen as one of the worst things you could do. Sometimes individual "backsliders" were referred to as "prodigals", referring to the Biblical parable of the prodigal son.
145. I attended FCI from September 2013 to May 2014, including the optional music program, Rejoice School of Music, run by K. MacMillan and A. MacMillan, who were elders in the Church and assisted with CCA's music program.

The Effects of the Abuse

146. 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.
147. I had and continue to have a fear and distrust of authority, relationship problems, and negative expectations about myself and others.
148. My time at CCA and the Church has severely impacted my faith and belief in religion.
149. I had and continue to have overwhelming feelings of shame, guilt, self-blame, humiliation, and loss of credibility.
150. I have had diminished educational and vocational opportunities.

151. I had and have a distrust of religious institutions, mental health problems, interpersonal and relationship problems, health problems, a distorted view of self, and a disconnect from social/cultural norms.
152. 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 behavior 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.
153. CCA and the Church provided for my and my family’s entire emotional, spiritual, physical, and social needs. I, and my family, were in a totally dependent role for all our needs, in a closed society cut off from the general society.
154. 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.
155. 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.
156. It took many years of processing my experiences as an adult to realize that I had engaged in various coping methods to protect myself throughout my childhood. Some of those methods included numbing myself to painful realities that I could not escape, bending over backwards to achieve what was desired from me as a child, becoming a master at masking my true thoughts and feelings, and people-pleasing out of fear of upsetting others and suffering a consequence as a result. Blind obedience made functioning within this high stress environment more tolerable, whether you truly agreed or not. These habits played a part in the major disconnect that I experienced

between my heart and mind. I had a really hard time forming personal opinions with supporting rationale without simply regurgitating information that was told to me. I regularly lived in prolonged periods of fight/flight/freeze, which has had a myriad of effects on my health and wellbeing.

157. I have personally struggled with PTSD, anxiety, depression, and nightmares, all of which I continue to treat with therapy and prescribed medication.
158. There was no one that I could safely turn to if I needed to talk about what was going on within the Church and/or CCA, because every adult enforced the same rules, expectations and standards of being. In my late teenage years, I remember feeling quite trapped, both in my own mind and physically. I carried things on my shoulders that no child should ever have to bear and I am still paying the price for it as an adult.
159. I struggle with asking for help because I feel like a burden when I do. This leads to me putting too much on my plate and wearing myself out trying to get everything done. I struggle with self-care for similar reasons, as I find it hard to make myself a priority that I value. I frequently prioritize the needs of others to the detriment of my own.
160. I often wonder what my life would currently look like if I would have been allowed to participate in club or competitive sports. At CCA, girls played on the CCA volleyball, boys played on the CCA basketball, and both were allowed on the CCA track team. That was the full extent of student's competitive sport careers; we were not allowed to play club sports. I dreamed of playing club volleyball and then playing for the Huskies at the University of Saskatchewan, but I was prohibited from chasing that dream. I continue to enjoy volleyball through adult leagues today, but I constantly wonder how far I could have gone in my volleyball career if I had been allowed to chase my dreams.
161. Reflecting back on the abuse I suffered at the hands of A. Benneweis, I still feel extremely violated and sometimes filthy knowing that I was fulfilling someone's

pedophilic fantasies as a vulnerable child and teenager. When other girls outside of CCA were dating people around the same age, I was being abused by a man that was more than twice my age. To this day, I hate when people raise the topic of first kisses because the memories recounted almost always involve people similar in age, whereas mine was robbed by a man in his thirties when I was only thirteen. I feel like a level of my innocence, some of my childhood, and a few of my firsts were stolen from me and replaced with haunting memories.

162. The abuse that I endured has made it very difficult for me to get over the habit or instinct of being a people pleaser as I have grown up and became an adult. I still catch myself fighting my internal fears that I am disappointing or upsetting others. I hate that I am reminded of A. Benneweis and the abuse he subjected me to when I drive around my home city. A. Benneweis still shows up in my nightmares sometimes, and this has caused me to fear and avoid falling asleep. I still severely struggle with sleeping to this day. Prior to A. Benneweis being convicted, it caused me a lot of grief and anguish knowing that A. Benneweis got to simply pack up and move to another Province without reaping any consequences for his brutal actions. I did not feel any closure or justice for the teenage years that were robbed from me. The lack of justice for myself and others ate away at me. While A. Benneweis' conviction has helped lighten the degree to which I struggle with these issues, I continue to struggle with my grief, anguish, and lack of closure today. I did not have a proper advocate throughout my teenage years and I want to do everything within my power to try to protect children in the present and future.
163. It took me a long time to get some of my self-esteem back once A. Benneweis left Saskatoon. I constantly walk around with a sense of guilt for not saying "No!" to him when I was thirteen. Despite actively working on my childhood trauma for several years now, I still struggle with my self-image and I continue to attribute blame to my thirteen year old self. After the abuse came to light, I felt like my fear of everything falling apart was becoming a reality, and that I had failed so many people at once. I

continue to battle against thoughts such as this today. I believe these thoughts were largely caused by the burden that A. Benneweis placed on me when he made me swear to secrecy and warned me about the chaos that would ensue in him and his family's life if I were ever to tell the truth about the abuse. I continue to battle against thoughts such as this today.


164. I was not offered any professional support or guidance to cope with the abuse that I suffered, nor was it recommended that I seek such support and guidance outside of CCA and/or the Church. The entire ordeal was essentially swept under the rug, and I was left to figure out and navigate romantic relationships on my own moving forward. I lost a lot of trust in the leadership in my life through this time, as I did not understand why they did not see the need to further help an abused minor. I had an extremely distorted perception of romantic relationships, which was coupled with severe people pleasing tendencies that resulted from my time at CCA and the Church. Because of this, I was stuck in a marriage that was ridden with domestic violence. Being taken advantage of sexually, psychologically and emotionally was entirely normalized and familiar to me as I had grown up experiencing the same thing. For these reasons, it took me a long time to recognize and identify the abusive treatment I endured in my previous marriage. If I would have been taught how to lead a healthy sexual and romantic life, I believe that I would not have been so quick to get married at such a young age, being only a week after I turned nineteen. I was naïve and did not know what I was doing. I could have avoided a lot of the abuse that I ended up normalizing and enduring throughout my previous marriage.
165. I have had to put a lot of conscious effort towards ensuring that I do not project my anger and frustrations from my past experiences onto new ones. I always wonder whether someone has ill-intent when they express an interest in me. I have to be careful about instinctually stereotyping male athletic staff that are in charge of girls. I get anxious thinking about something similar happening to my daughter because she

is extremely vulnerable due to having Rett Syndrome. She cannot speak, walk, or use her hands, and therefore cannot defend herself.

166. It has always been, and continues to be, an issue for me to relive and unpack these experiences. I have attended a lot of years in therapy working through this and learning how to deal with it. I am still working through it today.

167. I make this Affidavit in support of the motion to certify this action as a class proceeding and for no improper purpose.

SWORN/AFFIRMED BEFORE ME at the)
City of Saskatoon, in the Province of)
Saskatchewan, this 18 day of March, 2025.)



A Commissioner for Oaths in and for the
Province of Saskatchewan
My Commission Expires: _____
Being a Solicitor



Jennifer Soucy (Beauty)

This document was prepared by:
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File number: 21,835.1

THIS IS EXHIBIT "A" REFERRED TO IN
THE AFFIDAVIT OF JENNIFERY SOUCY
(BEAUDRY) SWORN THIS 18 DAY OF
MARCH, 2025.



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

*Student
Application*



**CHRISTIAN CENTRE
ACADEMY**

CHRISTIAN CENTRE ACADEMY
Student Application Form



Date of application: Sept 3/03
For school-year: 2003 - +9 2004
Submitting Subsidy Application: y n

For office use only
Application approved (initial)
Application entered (financial records)
Application entered (Academy records)

Name: BEAUDRY JENNIFER DAWN
last first middle

Address: 1656 Alexandra Ave Saskatoon SK S7K 3C3
street # city province p.c.

Birth date: m 08 d 29 y 1995 Age: 8

Last school attended: _____
name address

Father's name: Philip Beaudry

Address: as above or _____

Occupation: truck driver Work phone: 221-8849

Work name: Rental Service Corporation

Work address: 2215 Faithfull Ave

Mother's name: Dawn Beaudry

Address as above or _____

Occupation teacher Work phone: _____

Work name: CCA

Work address: 102 Pinehouse Drive

Does family attend church weekly? y n _____

Church name: CCM

Address _____

Phone _____ Pastor: _____

How long attended: 16 yrs

If less than 2 years, how long did you attend previous church? _____

Marital status of parent(s): married ___ divorced ___ remarried ___ separated

___ single ___ spouse deceased. Both parents involved? y n ___ If not, which parent

is contact person? m ___ f ___ Is contact from other parent permitted? y ___ n ___

Comments: _____

STUDENT COOPERATION

All student applicants aged 10 and up please read and sign.

1. Is it your desire to keep the rules of the Academy that you read in the Student Guidelines, including attitude, dress standards, discipline issues, and other matters that are part of life at CCA? y ___ n ___

2. Have you ever been in trouble with the police? y ___ n ___. If yes, explain briefly.

3. Are you now, or have you ever been on probation? y ___ n ___. If yes, explain briefly.

4. Have you ever used drugs other than those prescribed for you by a doctor? y ___ n ___.

If yes, explain. _____

5. Have you ever smoked? y ___ n ___. Do you smoke now? y ___ n ___.

6. Please read the following carefully.

Students should understand that attending CCA is a privilege which was given to them and their family. Therefore, students need to continually give their wholehearted and willing cooperation to every aspect of life in CCA. It should not be necessary to persuade a student to cooperate with any part of CCA standards and policies.

Students should also understand that the privilege of attending CCA means that they are expected to uphold high Christian standards of morality and speech, and will earnestly seek to grow as dedicated Christians who desire to pursue God's will for his/her life. It should be understood that if the administration and staff of CCA are concerned about any part of a student's life, in school or out of school, that reflects negatively on CCA's Christian status, the student's status in CCA will be reviewed. Students should be familiar with the expectations of the Student Guidelines. We will not debate CCA policies and regulations with students. We jealously protect CCA's Christian character.

If the applicant has read the Student Guidelines and is willing to abide by them, and agrees to cooperate with the statement above, please sign below.

student signature

PARENTAL STATEMENT OF COOPERATION

1 I understand that my child's attendance at CCA is a privilege and not a right. Therefore, if, in the opinion of the administration, my child's conduct, academic progress, or cooperation with school standards is in question, I understand that they have the right to review and/or terminate my child's status in CCA.

2 I promise to provide any information or records regarding my child's health or medical history that might have a bearing on my child's ability to function within the normally prescribed routine of the Academy. I will provide written record of health problems.

3 I agree with the Academy's effort to train my child in the Bible and in Biblical principles of conduct, speech, relationships with other students, and submission to authority. I desire for my child to be trained in a wholly Christian atmosphere.

4 I pledge my complete support to the Academy in its efforts to train and discipline my child in keeping with the standards of discipline the Academy sets for itself. I promise to honor the authority I delegate to the Academy for training my child, and to do nothing to undermine the system of discipline in place in the Academy.

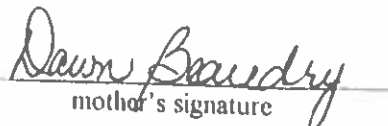
5 I promise to pay all fees and tuitions agreed upon between myself and the Academy. I understand that to neglect to do so hinders the Academy in its ability to carry out its programs, and also means that I expect other parents to carry my financial responsibility as well as their own. I understand that re-enrollment cannot take place if all fees are not paid up for the previous year.

6 I agree to fulfill all obligations regarding parent orientation, and to attend each parent meeting throughout the year (usually 3).

7 I am well acquainted with the Student Guidelines. I promise to take the responsibility for my child's willing adherence to the dress code.

8 I commit to working out any potential conflicts with the Academy with the understanding that my child's perspective on any issue is subjective and immature. I will always value the fact that the staff may have information regarding my child's performance and/or conduct that differs from my child's version of the situation, or my understanding of the facts.


father's signature



mother's signature


SCRIPTURAL DISCIPLINE AGREEMENT

CCA is honored that you have chosen our institution to assist you in training your child and equipping him/her for the future. Personal development is our passion for each and every student enrolled in our Academy. We are convinced that it is impossible to develop a student without clearly defined principles of conduct and discipline in place

CCA is convinced that the development of the student's character is the only way to develop the student for the future. Character is the unconscious doing of right. Each day, the student will be challenged to either act in a characterized manner, or to raise his/her character development to a new level to succeed in that day's tasks. Scriptural admonition and correction is part of that process. Any form of discipline used will be based on Biblical precepts. It should always be understood that discipline is what we do for the student, not what we do to them. The following guidelines will be used.

1. The problem will be clearly discussed with your child.
2. Scriptural principles and the practical application of those principles will be discussed.
3. The staff member will bring the student to an understanding of the proper form of discipline to be applied, if any, based on Academy standards of conduct.
4. The student is expected to submit to and cooperate with the discipline applied, not play one staff member against another, or his parents against the staff.
5. If the age of the student and the offense warrants it, a paddling may be the most appropriate form of discipline. In that case, the following procedures are strictly followed:
 - (a) A staff member of the same gender as your student will be present.
 - (b) Usually up to 3 strokes, and never more than 5 strokes, will be firmly applied to the buttocks of the student, as the student bends over with his/her hands placed on the seat of a chair. The paddle will be flat and wide enough to thoroughly contact the child's buttocks. No other device will ever be used.
 - (c) The child will not be physically restrained. Refusal to submit will require immediate contact with the parent. The Academy and the parents will agree on further steps to be taken to complete the discipline process. Until that happens, the child may be temporarily suspended.
 - (d) After the strokes have been applied, the staff member will allow the child a reasonable time to recover his/her emotions. The staff member will pray with the child and assure him/her of their love and God's love. At this time, further discussion and counsel will take place to assist the student in overcoming the character deficiency which caused the incident.
 - (e) A written record will be kept of the incident, and the parents will be notified.


father's signature of support


mother's signature of support

STUDENT RECORD RELEASE

Date _____

Attention: Principal or School Counselor

School Name

Address

City

Province

Postal code

Dear Counselor:

My child(ren) has been withdrawn from your school. Please release all pertinent academic and health records to the following school. Thank you.

ACCEPTING SCHOOL

Christian Centre Academy
102 Pinehouse Dr.
Saskatoon, SK
S7K 5H7

Student's Name
Last

First

Age

Present Grade Level

Signature of Requesting Parent/Guardian

Signature of Receiving Principal

THIS IS EXHIBIT "B" REFERRED TO IN
THE AFFIDAVIT OF JENNIFERY SOUCY
(BEAUDRY) SWORN THIS 18 DAY OF
MARCH, 2025.



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

Exhibit B
Vimeo Video

Service of hard copies will include a USB
Service by email will include a link in the service email

THIS IS EXHIBIT "C" REFERRED TO IN
THE AFFIDAVIT OF JENNIFERY SOUCY
(BEAUDRY) SWORN THIS 18 DAY OF
MARCH, 2025.



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

Saskatchewan

Former Sask. private school students allege being 'coerced' into working on political campaigns

Politician and member of adjacent church confirms campaigning, says it no longer happens

Jessie Anton · CBC News · Posted: Aug 08, 2022 6:00 AM CT | Last Updated: August 8



Some students who attended Saskatoon's Christian Centre Academy, now called Legacy Christian Academy, say the leaders of the adjacent church that ran the independent school used religion to coerce them into campaigning for conservative candidates during and outside of class. (Joe Pavia/CBC)

Former students of a Saskatoon private Christian academy say school and church officials pressured them into working on political campaigns to increase their power and advance their conservative social agenda.

The politicians allegedly include a former member of Parliament, Saskatoon's longest-serving mayor, and a sitting Saskatoon city councillor.

Despite the school and adjacent church being registered charities, students say a wide range of partisan political activity was conducted during school hours and during church services.

"People told us we needed to do it, that it was right ... it was your duty," said former student Chris Kotelmach. "I see now that we were coerced."

These political allegations come following last week's CBC News investigation into practices at the Christian Centre Academy (CCA), now called Legacy Christian Academy, and the Saskatoon Christian Centre, now called Mile Two Church. More than 30 students have now come forward with stories of violent discipline, traumatic rituals and solitary confinement.

- **CBC INVESTIGATES Exorcisms, violent discipline and other abuse alleged by former students of private Sask. Christian school**
- **List of students alleging abuse at Sask. Christian school growing rapidly**

One longtime critic said this political activity is a symptom of the leadership's quest to impose their social conservative views on others by any means necessary.

"This is not Christian. This is sinister. It's sickening. Coercing students to do this is wrong," said University of Regina professor emerita Ailsa Watkinson, who was involved in a 2004 Supreme Court case challenging the use of corporal punishment on children.

"I suppose we shouldn't be surprised after what we heard about all of the physical and spiritual abuse. This fits right in with students who say this was a cult," Watkinson said.

Kotelmach, who was named the top student at the school for his academic and "spiritual excellence," said he remembers standing on street corners in Saskatoon, waving signs that helped Don Atchison win the first of four mayoral elections in 2003.

Students said Atchison, not a member of their church, would be seated in the front row whenever he'd attend their services. The pastor would tell everyone that they needed to vote for him.

"[Atchison] was someone the pastor felt was going to help us promote the Christian agenda," said former student Christina Hutchinson, who remembers being told campaigning was "mandatory" for students.



Sean Kotelmach says school officials practised forms of solitary confinement. As a 13-year-old, he was placed in a small, windowless room with only a desk for 10 consecutive school days, prohibited from speaking to anyone. (Travis Reddaway/CBC)

Kotelmach said students were also required to buy dress clothes from Atchison's high-end retail store. He and his brother each had to buy two pairs of pants per year from there. Kotelmach provided CBC News with a receipt for \$316.12 from one year's purchase.

CBC News has reached out to Atchison for comment and has not received a reply.

Kotelmach's brother, Sean, said teachers and church staff were constantly telling the kids that conservatives were good and "anything liberal was evil."

The Kotelmachs said — even though civic politicians don't control abortion policy or other social issues — being close to political power at all levels was a central goal of the church and school leaders.

Looking back, the family says that Sean was frequently paddled and disciplined in part because of his refusal to participate in the political campaigns, while Chris — a tireless political volunteer — received awards and other praise.

"We all thought we had to do it or the world would end," Chris said.

'It was inappropriate': Saskatoon city councillor

Caitlin Erickson, who attended CCA from 1992 to 2004, also recalls being involved in at least two of Maurice Vellacott's federal campaigns when he ran for Parliament in the riding of Saskatoon-Wanuskewin.

Erickson remembers being pulled out of school with her classmates at age 11 to drop off Reform Party flyers in mailboxes in 1997.

Two years later, at the age of 13, half of the class would take turns heading down to Vellacott's campaign office to stuff envelopes with his Canadian Alliance pamphlets, she said.

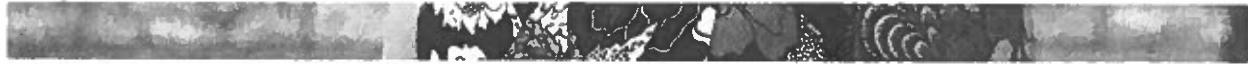
Other students recall being forced to sing a campaign song, replacing the lyrics of *Feliz Navidad* with "Mau-ricé Vell-a-cott."

As Erickson grew older, flyer drop-offs and envelope stuffing turned to attending protests, such as those in the lead-up to the Saskatchewan judicial system's approval of same-sex marriages in 2004.

"It's still something that crushes me to this day," Erickson said, noting she sees herself now as an ally to the LGBTQ+ community.

"It's so heartbreaking to know that I was put in that position as a minor."





Caitlin Erickson was the first of more than 30 former students of Saskatoon's Christian Centre Academy, now called Legacy Christian Academy, to go to police. She says the degree of control exerted by school and church officials was similar to a cult. (Travis Reddaway/CBC)

In an interview with CBC News, Vellacott confirmed that many students in Saskatoon, including those at CCA, assisted on his various campaigns. But he said there was no indication they were coerced.

"It was an early dose of learning," Vellacott said. "It was a good education for them as well."

Vellacott remembers how CCA students would cold-call people to chat about his political platforms or would help by "burmashaving" — holding political signs and waving to traffic on the side of the road — in support of his campaign.

"To me, it was quite invigorating, exhilarating because there were so many young people involved," he said.

Vellacott said he doesn't recall any students being pulled out of class to help. If it did happen, he said, "I wouldn't have been the one to initiate that."

But another politician who received help admits it was wrong.



Randy Donauer, a current Saskatoon city councillor and longtime member of Mile Two Church, says he was endorsed by the pastor in his 2010 bid, but no subsequent campaigns. (Guy Quenneville/CBC)

Randy Donauer is a current Saskatoon city councillor and also a longtime member of Mile Two Church. He confirmed that he was endorsed by the pastor in his 2010 bid for Saskatoon city council, but did not use church resources for the campaign. However, Donauer admitted he helped organize campaigns for other politicians.

"Yes, students were recruited, even during school hours, to deliver campaign material. Yes, [the pastor] gave political endorsements during church services," he said in an emailed statement to CBC News.

"It was inappropriate ... A church should not take partisan political stands. That is not the purpose of a church."

Donauer said the formal political activity stopped "several years ago" and he did not receive any assistance of this kind for his unsuccessful bid as a Conservative vying for a federal seat in 2015 or his subsequent city council victories.

He said things are better now and the church is a welcoming place for everyone of all political views.

Dancing the charitable line

Jim Farney, the director and an associate professor at the Johnson Shoyama Graduate School of Public Policy, said there are "no black and white regulations" in Saskatchewan's independent school legislation around political involvement.

However, Farney points to the federal Income Tax Act, which bans charities — such as many independent schools — from directly or indirectly supporting or opposing a political party or candidate by using its resources (including office supplies and volunteers). Doing that could lead to an audit, according to the Canada Revenue Agency's guidance document, which was updated in January 2019 and replaced previous legislation that came into effect in September 2003.

"There's a massive difference between doing civics [assignments] and doing model Parliament and all of that stuff — which is clearly educational — and saying, 'Hey kids, you get Friday afternoon off if you go door-knocking for person X!' That is a really important distinction," he explained.

"You could talk about whether that crosses the charity line — and I think it does — but it certainly crosses the line of just the spirit of what a school is about."

The current leadership at Legacy Christian Academy and Mile Two Church have declined repeated interview requests.

With files from Jason Warick and Yasmine Ghania

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