

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

BETWEEN:

DANIEL CARCILLO and GARRETT TAYLOR

Plaintiffs

- and -

ONTARIO MAJOR JUNIOR HOCKEY LEAGUE, CANADIAN HOCKEY LEAGUE, WESTERN HOCKEY LEAGUE, QUEBEC MAJOR JUNIOR HOCKEY LEAGUE, BARRIE COLTS JUNIOR HOCKEY LTD., GUELPH STORM LTD., HAMILTON BULLDOGS FOUNDATION INC., KINGSTON FRONTENACS HOCKEY LTD., KITCHENER RANGERS JR. A. HOCKEY CLUB, LONDON KNIGHTS HOCKEY INC., MISSISSAUGA STEELHEADS HOCKEY CLUB INC., 2325224 ONTARIO INC. o/a MISSISSAUGA STEELHEADS, NIAGARA ICEDOGS HOCKEY CLUB INC., NORTHBAY BATTALION HOCKEY CLUB LTD., OSHAWA GENERALS HOCKEY ACADEMY LTD., OTTAWA 67'S LIMITED PARTNERSHIP c.o.b. OTTAWA 67S HOCKEY CLUB, THE OWEN SOUND ATTACK INC., PETERBOROUGH PETES LIMITED, 649643 ONTARIO INC. o/a 211 SSHC CANADA ULC o/a SARNIA STING HOCKEY CLUB, SOO GREYHOUNDS INC., SUDBURY WOLVES HOCKEY CLUB LTD., WINDSOR SPITFIRES INC., MCCRIMMON HOLDINGS, LTD., 32155 MANITOBA LTD., A PARTNERSHIP c.o.b. as BRANDON WHEAT KINGS, BRANDON WHEAT KINGS LIMITED PARTNERSHIP, CALGARY FLAMES LIMITED PARTNERSHIP, CALGARY SPORTS AND ENTERTAINMENT CORPORATION, EDMONTON MAJOR JUNIOR HOCKEY CORPORATION, KAMLOOPS BLAZERS HOCKEY CLUB, INC., KAMLOOPS BLAZERS HOLDINGS LTD., KELOWNA ROCKETS HOCKEY ENTERPRISES LTD., PRINCE ALBERT RAIDERS HOCKEY CLUB INC., EDGEPRO SPORTS & ENTERTAINMENT LTD., QUEEN CITY SPORTS & ENTERTAINMENT GROUP LTD., BRAKEN HOLDINGS LTD., REBELS SPORTS LTD., SASKATOON BLADES HOCKEY CLUB LTD., VANCOUVER JUNIOR HOCKEY LIMITED PARTNERSHIP and VANCOUVER JUNIOR HOCKEY PARTNERSHIP, LTD c.o.b. VANCOUVER GIANTS, WEST COAST HOCKEY LLP, WEST COAST HOCKEY ENTERPRISES LTD., o/a VICTORIA ROYALS, MEDICINE HAT TIGERS HOCKEY CLUB LTD., 1091956 ALTA LTD. o/a THE MEDICINE HAT TIGERS, SWIFT CURRENT TIER 1 FRANCHISE INC. and SWIFT CURRENT BRONCOS HOCKEY CLUB INC. o/a SWIFT CURRENT, ICE SPORTS & ENTERTAINMENT INC.

o/a WINNIPEG ICE, MOOSE JAW TIER 1 HOCKEY INC. D.B.A. MOOSE JAW and MOOSE JAW WARRIORS TIER 1 HOCKEY, INC. WARRIORS o/a MOOSE JAW WARRIORS, LETHBRIDGE HURRICANES HOCKEY CLUB, 649643 ONTARIO INC. c.o.b. as SARNIA STING, KITCHENER RANGER JR A HOCKEY CLUB and KITCHENER RANGERS JR "A" HOCKEY CLUB, LE TITAN ACADIE BATHURST (2013) INC., CLUB DE HOCKEY JUNIOR MAJEUR DE BAIE-COMEAU INC. o/a DRAKKAR BAIE-COMEAU, CLUB DE HOCKEY DRUMMOND INC. o/a VOLTIGEURS DRUMMONDVILLE, CAPE BRETON MAJOR JUNIOR HOCKEY CLUB LIMITED o/a SCREAMING EAGLES CAPE BRETON, LES OLYMPIQUES DE GATINEAU INC., HALIFAX MOOSEHEADS HOCKEY CLUB INC., CLUB HOCKEY LES REMPARTS DE QUEBEC INC., LE CLUB DE HOCKEY JUNIOR ARMADA INC., MONCTON WILDCATS HOCKEY CLUB LIMITED, LE CLUB DE HOCKEY L'OCEANIC DE RIMOUSKI INC., LES HUSKIES DE ROUYN-NORANDA INC., 8515182 CANADA INC. c.o.b. CHARLOTTETOWN ISLANDERS, LES TIGRES DE VICTORIAVILLE (1991) INC., SAINT JOHN MAJOR JUNIOR HOCKEY CLUB LIMITED, CLUB DE HOCKEY SHAWINIGAN INC. o/a CATARACTES SHAWNIGAN, CLUB DE HOCKEY JUNIOR MAJEUR VAL D'OR INC. o/a VAL D'OR FOREURS, 7759983 CANADA INC. c.o.b. AS CLUB DE HOCKEY LE PHOENIX, 9264-8849 QUEBEC INC. c.o.b. as GROUPE SAGS 7-96 AND LES SAGUENEENS, JAW HOCKEY ENTERPRISES LP c.o.b. ERIE OTTERS, IMS HOCKEY c.o.b. FLINT FIREBIRDS, SAGINAW HOCKEY CLUB, L.L.C., EHT, INC., ~~JOHN DOE CORP. A o/a EVERETT SILVERTIPS HOCKEY CLUB~~, WINTERHAWKS JUNIOR HOCKEY LLC, PORTLAND WINTER HAWKS INC., THUNDERBIRDS HOCKEY ENTERPRISES, L.L.C., ~~JOHN DOE CORP. B. o/a SEATTLE THUNDERBIRDS~~, BRETT SPORTS & ENTERTAINMENT, INC., HAT TRICK, INC., ~~JOHN DOE CORP. C o/a SPOKANE CHIEFS~~, TRI-CITY AMERICANS HOCKEY LLC, and TOP SHELF ENTERTAINMENT, INC. and ~~JOHN DOE CORP. D o/a TRI-CITY AMERICANS~~

Defendants

Proceeding under the *Class Proceedings Act, 1992*

**AFFIDAVIT OF CAMERON HOPE**  
(Sworn October 29, 2021)

I, Cameron Hope, of the City of Victoria, in Province of British Columbia, **MAKE OATH AND SAY:**

1. I am the Chief Executive Officer of BC Hockey and have held that role since 2020. BC Hockey is a nonprofit organization that develops and promotes amateur hockey in both British Columbia and Yukon.
2. I grew up playing hockey in the 1970s and 1980s up to the Junior B level.
3. I practiced law in Edmonton, Alberta for 11 years at Molstad Gilbert LLP (now Dean Duckett Carlson LLP). My practice mainly involved insurance defence litigation, sports labour litigation, and general civil litigation. I am currently a non-practicing member of the Law Society of Alberta.
4. In 2004, I joined the National Hockey League's New York Rangers as Vice President, Hockey Administration, Research and Development. In this role, I was responsible for administrative areas such as salary cap compliance, player movement and trades, and contract negotiation. In 2007, I was promoted to Assistant General Manager of the Rangers.
5. In 2012, I became the General Manager of the Western Hockey League's (the **WHL's**) Victoria Royals, a role I held until 2020. From 2014 to 2020 I was also the Royals' President.
6. I know about the matters in this affidavit. If I have made statements of my information and belief, the source of the information and the fact of the belief are specified in this affidavit.

### **My Knowledge of and Experience with Hazing in Hockey**

7. Throughout my time playing Junior B hockey, I never experienced or witnessed any abusive hazing of rookies. During my rookie seasons in midget and junior hockey, including with the Junior B Edmonton Mustangs in 1980-1981, I remember the veteran players teasing the rookies that they might be hazed, but nothing actually happened. I also never heard about any humiliating or degrading hazing on other teams. The extent of my knowledge about hazing in hockey is from the media. On the occasions when I have learned about a hazing incident from the media, I have been surprised, as that was not my experience.

### **My Experience as the General Manager of the Victoria Royals**

8. I became General Manager of the Victoria Royals in 2012, which was my first involvement with amateur hockey since the early 1980s. When I joined the Royals, three characteristics stood out to me on how the WHL dealt with hazing, abuse and player safety generally. I describe these characteristics below.

9. First, it cannot be overstated how seriously the leadership of the WHL takes the issue of player safety. Nobody in a leadership position in the WHL that I have worked with has shown any tolerance for hazing or abuse, and has never once exhibited, that I have observed, anything resembling a “boys will be boys” attitude toward player behaviour. It quickly became clear to me upon joining the Royals that the player experience, including preventing hazing and abuse was a top priority for the WHL leadership.

10. Second, by the time I joined the Royals, my observation was that there was an extensive infrastructure in place for preventing hazing and abuse. While the WHL has league-wide policies

and programs to address hazing, implementation of these policies and programs happens at the team level. Most notably on the Royals, there was a robust program for everyone involved in team operations, including management, coaches, players, and billets. This training emphasized that players would be supported with no negative repercussions if they came forward with any concerns. In addition, there was a significant focus on mental health and well-being generally, which, in my view, reinforces the principle of respect for others that is key to preventing hazing.

11. Third, the WHL took every incident of abuse very seriously and made it clear that they expected the individual teams to do the same. For example, during my time with the Royals, there was a complaint by an adult volunteer that the team's equipment manager had not treated him well and had yelled at him many times. The WHL required the Royals to investigate, prepare a report, and submit the report to the league, after which the league requested follow-up items be addressed. The WHL also conducted its own investigation into the matter and prepared its own report.

12. From my perspective, the WHL's approach toward player safety and well-being is not only appropriate, but also effective, thoughtful and intelligent.

13. At nearly every annual general meeting and other in-person meetings among the league's General Managers, player safety was on the agenda, including any policy updates, new programs, or suggestions from individual teams.

### **The Royals' Anti-Hazing Training and Infrastructure**

14. Throughout my time with the Royals, the team operated under the WHL Regulations, which includes the Abuse, Bullying, Harassment and Hazing Policy (the **Policy**). The Policy

strictly prohibited all abuse, bullying, harassment and hazing. To help implement the Policy, the Royals hosted a training program that management (including myself), coaches, players, staff, and billets were all required to attend, called the Respect in Hockey Program.

15. I remember how impressed I was at the comprehensiveness of the Respect in Hockey Program, which I believe the WHL implemented in 2011. It was not simply a one-off session to “check a box”. Instead, it was a year-round program focusing on how, as an organization, we could establish a culture where everybody involved with the team knew that hazing was unacceptable and needed to be prevented. There was a constant emphasis on the importance of respect for one another and the requirement to report any unacceptable conduct. As part of this training, we learned how to respond to and escalate player complaints, as well as how to model positive behaviour. We were taught how to show players that it was a badge of strength to come forward.

16. Together with training, the Royals implemented several support programs to prevent hazing. This included a program implemented by the WHL in 2015 called the Security Network. The Security Network was headed by a Security Network Officer, independent of the WHL, who appointed a Club Liaison Officer to each team, and who operated independently from the Royals’ management and reported to the Security Network Officer. During my time with the Royals, the Club Liaison Officer was Ross Smith.

17. The Royals also had a Respect Champions Team, under the Respect in Sport Program. The Respect Champions Team was made up of players, management, coaches, and the Royals’ Club Liaison Officer, and was run by the Respect Team Champion, an independent volunteer. My recollection is that the Royals’ Respect Team Champion was our Education Coordinator,

Tammy Renyard. The Respect Champions Team was also responsible for delivering workshops focused on preventing abuse, bullying, harassment and hazing.

18. Beyond these formal, league-wide programs, the Royals also pursued informal strategies at the team level to ensure player well-being. For example, our coaches facilitated regular “locker-room discussions” where players could raise any concerns or thoughts they would like to discuss. These casual discussions appeared particularly effective in encouraging players to speak up about their experiences, either during the locker room discussion or later. The Royals’ coaches—Dave Lowry and Dan Price—were excellent role models in this way, and, from what I observed, took it upon themselves to create teachable moments whenever issues arose, and reinforce that they had open doors at all times for players to use to talk about anything.

19. I am aware of the allegations made by the plaintiffs. The abuse, hazing, and general atmosphere described does not at all reflect my understanding of the player experience with the Royals. During my time with the Royals, I did not witness or hear about instances of rookie hazing by veteran players. No instances of hazing were ever reported to me by coaching staff or players. If hazing had been reported, I would have taken it very seriously. I would have encouraged the complainant to pursue one of the various reporting mechanisms available to players, or would have reported the incident myself. There would have been no repercussions for the complainant.

**SWORN** by Cam Hope of the City of Victoria, in the Province of British Columbia, before me at the City of Toronto, in the Province of Ontario, on October 29, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

*Marshall Torgov*

EB91230899384D9

Commissioner for Taking Affidavits  
(or as may be)

DocuSigned by:

*Cameron Hope*

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**CAMERON HOPE**

DANIEL CARCILLO et al.  
Plaintiff

-and-

ONTARIO MAJOR JUNIOR HOCKEY LEAGUE et al.  
Defendants

Court File No. CV-20-00642705-00CP

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**ONTARIO  
SUPERIOR COURT OF JUSTICE**

PROCEEDING COMMENCED AT  
TORONTO

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**AFFIDAVIT OF CAMERON HOPE**

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