

**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 CHAD TAYLOR**  
(Sworn October 28, 2021)

I, Chad Taylor, of the City of Regina, in the Province of Saskatchewan, **MAKE OATH AND SAY:**

1. I am the Governor and President of Moose Jaw Tier 1 Hockey Inc., doing business as the Moose Jaw Warriors, a member club of the Western Hockey League (the **WHL**). I have held the position of Board President since 2009 and was appointed Governor in 2013. Before these roles, I was a member of the Warriors Board of Directors between 2001 and 2004, and was reappointed in 2006 until I was appointed Board President.

2. Aside from my roles with the Warriors, which are volunteer positions, I own and operate car dealerships in Moose Jaw and Regina.

3. Before my involvement with the Warriors, I had a long history of involvement in amateur hockey in Saskatchewan. I played minor league hockey growing up until I was 13 years old when I started working as a referee in minor league hockey. I stopped refereeing when I left Regina to attend post-secondary school at Georgian College in Barrie, Ontario. After Georgian College, I attended Northwood University in Texas. After completing my degree, I returned to Regina to work for my family's car dealerships. At age 24, I moved to Moosejaw where my family had opened a new dealership. In Moosejaw, I starting refereeing again for a few years until I became involved with the Warriors.

4. 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**

5. Throughout my time playing and refereeing minor hockey from a young age, I never experienced, witnessed, or heard about hazing of rookie players. I experienced more of what I would describe as “hazing” in high school than I ever experienced or witnessed playing or refereeing hockey.

### **My Experience as the Governor and President of the Moose Jaw Warriors**

6. 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 on the Warriors or in the WHL generally. This behaviour is not permitted on our team. In particular, I have not heard of any initiation or hazing incident resembling the “hot box”, “elephant walk” or “rookie rocket” occurring on the Warriors or, for that matter, on any other team.

7. To the extent that I have heard of hazing on other teams, it has been in relation to isolated incidents perpetrated by one or two rogue veteran players. I believe that the average age of a team, the personality of its captain, and the philosophy of its coaching staff and management all influence the likelihood of this type of rogue behaviour by veteran players.

8. The worst hazing incident I have heard about involved a rookie player on the Warriors during the 2015-2016 season who drank too much at a party and needed to get his stomach pumped. That said, I never understood that he was forced to drink by the veteran players, so I would not necessarily consider this to have been a “hazing” incident. This event occurred without the knowledge of the coaching staff or team management. While unsanctioned team parties are not permitted on the Warriors, players have lives outside of hockey and should be

permitted to enjoy their high school experiences, and some players are of-age and can therefore drink legally, but we do not condone drinking at team events. Since learning of this incident, we have increased measures on our team to prevent rookie parties and parties generally from occurring, including informing players that they will face sanctions if they host an unauthorized event of any kind.

9. One of the roles of the Warriors' General Manager is to develop internal policies and programs, including in relation to hazing. The coaching staff then reviews and modifies these policies to ensure the wording is strong enough to deter and deal with future misconduct. The Warriors' policies and practices are reviewed by the General Manager at regular intervals, typically once a year, and are reviewed again if a particular incident occurs. Policies sometimes cross my desk, but are mainly the responsibility of the General Manager and coaching staff. That said, if a serious incident occurs about player safety (which would include the significant forms of "hazing" described by the plaintiffs), the Board will be informed and will review the relevant policies and practices to determine whether they need amending, or if a meeting with the players is needed to review the relevant policies or practices. The Warriors are a community-owned team in a small town. As a result, I imagine there are very few incidents about player safety that do not reach my ears.

10. If a player wanted to report a concern or complaint about player safety, which we encourage, they have several options. On the Warriors, players are particularly close with their billet families. This is likely because Moosejaw is a small and relatively remote community, and most players are living away from home. Billets are typically the first point of contact for any player concerns or complaints. This practice is not team policy, but has naturally developed as a part of the Warriors' culture. Aside from their billets, players can also speak with their team

captains, coaching staff, General Manager, or team chaplain. If a player wanted to make a confidential complaint, they can speak to the team's Club Liaison Officer. All of these individuals have open door policies. Players face no negative consequences for making use of these reporting options and, in fact, are encouraged to speak to whomever they are comfortable with.

11. The WHL has adopted a zero tolerance policy against hazing. Alongside this policy, I believe two other factors explain why hazing is currently uncommon in the league. First, major junior hockey is more competitive than ever. Maturity and focus are required for individuals and teams to succeed as the player pool grows. Second, players have more resources available to them than they used to: personal coaches, sports psychologists, agents, education advisors, billets and parents, all of whom are more involved in players' day-to-day lives than ever before. As a result, players are almost always supervised, and the focus on skill development to make it to the next level is their top priority. The culture of hockey today, as far as I have observed, is regimented and structured, and allows players to perform their best, physically and mentally.

**SWORN** by Chad Taylor of the City of Regina, in the Province of Saskatchewan, before me at the City of Toronto, in the Province of Ontario, on October 28, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.

DocuSigned by:

*Marshall Torgon*

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Commissioner for Taking Affidavits  
(or as may be)

DocuSigned by:

*Chad Taylor*

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**CHAD TAYLOR**

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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PROCEEDING COMMENCED AT  
TORONTO

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**AFFIDAVIT OF CHAD TAYLOR**

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