

**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 KRUISE REDDICK
(Sworn October 28, 2021)

I, Kruse Reddick, of the City of Edmonton, in Province of Alberta, **MAKE OATH AND SAY:**

1. I played in the Western Hockey League (the **WHL**) with the Tri-City Americans for five seasons, between 2006 and 2011. During my final season (2010-2011), I was team captain.
2. 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 Background Playing Hockey

3. I grew up on a farm in Manor, Saskatchewan. I started skating when I was 2 years old, on an ice rink my father made on our property. I started playing organized hockey when I was 4 years old. My older brother played minor hockey up to the Junior B level, and my father was a coach, so I grew up around the sport. My father was my coach on all of my minor hockey teams until I was 15 years old. In my final year before joining the Tri-City Americans, I played in the Saskatchewan Male U18 AAA Hockey League for the Yorkton Harvest, which required me to move away from home to Yorkton.
4. I did not experience or witness any hazing during my time playing minor or junior hockey before joining the Tri-City Americans.

My Experience Playing for the Tri-City Americans

5. My rookie year in the WHL was the 2006-2007 season. At the time, I was 16 years old, which meant that there was a significant age gap between myself and the veteran players.

6. I am aware of the allegations made by the plaintiffs. The abuse, hazing, and general atmosphere described does not at all reflect what I experienced or witnessed while playing in the WHL.

7. During my rookie year playing for the Americans, I never experienced any hazing or abuse. On the Americans, rookies were responsible for some minor team chores, like loading the bus or collecting pucks from the ice after practice, but there was no bullying or abuse involved in this; it was just considered a rookie responsibility.

8. There was no “rookie party” in my rookie year, nor in my years as a veteran player with the Americans. I remember the team had an activity around Halloween where all of the players, rookies and veterans, dressed up in costumes of their choice and went to the movies. During my time with the Americans, parties were generally tame, and while there was sometimes alcohol, I do not recall anyone ever being forced to drink. Because the drinking age in the State of Washington is 21, alcohol was hard to access, so there was not much drinking on the team. We were a good team, and wanted to win; we were not partiers. I do not recall any drug use at all.

9. I never witnessed or experienced anything resembling the “hot box”, “elephant walk” or “rookie rocket” during my time in the WHL, nor did I ever hear about anything like that occurring on any other team.

10. During my time with the Americans, any initiation or hazing would have been completely unacceptable and inconsistent with how players were expected to treat each other. Had anything like the hazing or abuse described by the plaintiffs happened to me, I would not have hesitated to report it to the head coach (Don Nachbaur followed by Jim Hiller), our General Manager (Bob Tory), or the team chaplain. I would have felt comfortable doing so, since that behaviour was not

acceptable on the Americans. Our coaching staff and Mr. Tory made clear they had an open-door policy. I also had a close relationship with our team's chaplain, as did many other players.

11. I recall that, at the start of every season, Mr. Tory held a team meeting. We would discuss the season ahead, and Mr. Tory would address issues related to both on and off-ice conduct for all of the players. Hazing was one of the issues that was addressed each year. Mr. Tory made clear that he would not tolerate hazing of any sort and that any player involved in such behaviour would be dismissed from the team.

12. I became captain of the Americans during the 2010-2011 season. Part of my responsibilities as both captain and a veteran player were to uphold and reinforce the team culture that made playing for the Americans such a great experience. For example, one of the responsibilities I assumed was ensuring that every player had a safe ride home if we had a team event. This was one of the ways I tried to set a good example for the rookies and made sure to look out for them. I did not allow hazing to occur on the team while I was captain, nor did the other veteran players. If I had witnessed or heard about hazing or abuse on the Americans while I was captain, I would have taken immediate action to prevent it, and would have reported it to the coaching staff, management, or someone else in leadership.

13. I had an incredible experience playing for the Americans. My time in the WHL not only prepared me for my professional career in hockey, but also helped me develop a sense of responsibility and leadership off the ice. If I could do it all over again, I would. Attached as **Exhibit A** to this affidavit is a link to a video interview I gave after my last game with the Americans on April 4, 2011 where I discuss my experience with the team.

Garrett Taylor's Affidavit

14. I have reviewed Garrett Taylor's affidavit. Mr. Taylor's time in the WHL (2008-2010) overlapped with my time in the WHL (2006-2011).

15. The hazing and abuse that Mr. Taylor describes during his time with the Lethbridge Hurricanes did not happen on the Americans. I remember players being cut from the Americans, but they did not experience the "garbage bag treatment" or any other intentional humiliation. I do not believe that Mr. Tory, nor any member of the Americans' coaching staff, would have condoned, let alone promoted, anything like the "garbage bag treatment". Sometimes players were traded before we left for a road-trip, as that can happen at any time, but these trades were never announced in a humiliating way. When a trade occurred on the Americans, Mr. Tory would always tell the player privately in his office before making the announcement to the team in a kind way that permitted everyone to say goodbye and wish the player well. Further, Mr. Tory and his coaching staff would have never engaged in the behaviour Mr. Taylor describes of the Hurricanes' coaches, such as refusing to make eye contact with rookies when meeting them, requiring players to fight each other, or buying players alcohol. This was not how the Americans operated.

16. As a result, I disagree with Mr. Taylor's statement that the WHL had a "gangster culture" that was "everywhere". There was no such culture on the Americans. While I cannot speak in any detail about the rest of the WHL, since I only played with the Americans, I had not heard about any instances of the sort of abuse and bullying Mr. Taylor describes until reading his affidavit. It has never been my impression that the sort of culture he describes was typical of WHL teams.

My Post-WHL Hockey Career

17. From 2011 to 2016, I attended and played hockey for the University of Alberta. I was assistant captain of the team in my third season and captain of the team for my final two seasons. In 2016, I graduated with a degree in Recreation and Sports Tourism. I never experienced or witnessed any hazing during my time playing for the University of Alberta.

18. After graduating from the University of Alberta, I briefly played in the East Coast Hockey League before moving to Europe to play professionally. From 2016 to 2017, I played for HC Vita Hästen in the HockeyAllsvenskan, the second tier of Swedish professional hockey. Then, from 2017 to 2020, I played for the Guilford Flames in the Elite Ice Hockey League, the first tier of professional hockey in the United Kingdom. Lastly, I played for HK Dukla Trencin in Slovakia's top league, the Tipos Extraliga, from 2020 to 2021.

19. During my professional career, I never witnessed any abuse or hazing like the plaintiffs have alleged, although I know that some teams had the same tradition as the Americans of rookie players doing minor chores for the team.

20. After the 2020-2021 season, I retired from professional hockey. I am now pursuing a career in the oil industry in Edmonton.

21. At this time I do not have any involvement with the WHL, aside from occasionally attending games and following the progress of the Americans.

SWORN by Kruse Reddick of the City of Edmonton, in the Province of Alberta, 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:

Mina Butz

Commissioner for Taking Affidavits
(or as may be)

DocuSigned by:

Kruse Reddick

KRUISE REDDICK

This is Exhibit A
referred to in the Affidavit of Kruise Reddick,
sworn before me this 28th day of October, 2021

DocuSigned by:

Mina Butz

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A Commissioner for Taking Affidavits

Exhibit A can be accessed through the following link:
https://www.youtube.com/watch?v=0_0LQJ_8GIk

DANIEL CARCILLO et al.
Plaintiff

-and-

ONTARIO MAJOR JUNIOR HOCKEY LEAGUE et al.
Defendants

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

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
TORONTO

AFFIDAVIT OF KRUISE REDDICK

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