

**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 RYAN DANIELS
(Sworn October 31, 2021)

I, Ryan Daniels, of the City of Austin, in the State of Texas, **MAKE OATH AND SAY:**

1. I played in the Ontario Hockey League (**OHL**) for four seasons from 2005 to 2009. I was a goalie on the Saginaw Spirit for three seasons before being traded to the Peterborough Petes for my final season in the OHL.
2. After playing in the OHL, I attended Wilfrid Laurier University and played four seasons in the Canadian Interuniversity Sport league between 2009 and 2013.
3. I spent one season as a Video Coach for the OHL's Mississauga Steelheads from 2015-2016, before I was promoted to Goaltending Coach for the 2016-2017 and 2017-2018 seasons. I then became the Goaltending Coach for the OHL's Guelph Storm in 2018 and held that position for three seasons.
4. I am currently the Developmental Goaltending Coach for the Dallas Stars of the NHL, a position I started before the 2021-2022 season.

My Experience in the OHL

5. My first year with the Saginaw Spirit was the 2005-2006 season. While there was a "rookie party", my teammates and I were never forced to drink or do anything that made us uncomfortable. The purpose of the party was to welcome the new players and build strong social bonds for the season ahead. I do not recall witnessing any other first-year players being coerced into drinking by the veteran players either.
6. I did not experience or witness any "hazing" during my four seasons in the OHL, either on the Spirit as a rookie and veteran player, or on the Petes as a veteran player. I did not

experience the “hot box”, “elephant walk”, or the “rookie rocket”. I did not witness or hear about sexually inappropriate or offensive treatment of women from my teammates. If any “rookie traditions” took place on the Spirit, they were team chores like loading, unloading and cleaning the bus for road trips. If we were having a team meal, rookies would sometimes get their food last. I do not consider any of this to be “hazing”.

7. 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, witnessed or heard about while playing in the OHL. I remain in regular contact with many friends from my OHL days. When the news of the plaintiffs’ allegations emerged, my friends and I spoke at length about our shock and dismay, as none of us had experienced anything remotely similar to the abuse described by the plaintiffs. We discussed our wonderful experiences playing in the OHL, and how we miss and treasure that period in our lives.

8. Given that there are 60 teams in the Canadian Hockey League, each composed of about 30 players at a time, I believe there is a wide range in the player experience across the league. Still, I am surprised and saddened to know that some players did not have the same positive experience that my friends and I had.

9. If I had experienced or witnessed hazing like that described by the plaintiffs, I would have immediately told my coach, assistant coaches, parents or even called the police. I am confident that I would not have faced repercussions in doing so. I would not have perpetrated that behaviour as a veteran. I understand how a healthy team is supposed to function, and I would not have been content playing on a team where this sort of behaviour was condoned or ignored.

My Experience as an OHL Coach

10. As a Video and Goalie Coach for the Mississauga Steelheads and Guelph Storm, my job involved attending every practice and game, and deconstructing game footage with players. As a result, I spent a great deal of time at the arena in my office with the other coaches, in close proximity to the locker room.

11. I made sure I fostered a professional working relationship with the players, so that they would feel comfortable talking to me and approaching me about any issues they may have been having, either at or away from the arena in their personal life. I never witnessed or heard about any “initiation” or “hazing” on the Steelheads or the Storm. I believe that if hazing did occur, it is likely that I would have been aware of it, or that a player would have reported it to me. Players knew that I had an open-door policy to discuss any subject at any time, and that there would be no repercussions for using me and my office as a safe space.

12. The head coaches on both the Steelheads and Storm while I was involved with the teams, James Richmond and George Burnett respectively, are consummate professionals. They both strove to create a positive team atmosphere by treating every player with respect and dignity. For example, Mr. Richmond did not require first-year players to load and unload everyone’s bags from the team bus. Players were responsible for their own bags, and first-year players would each be assigned one further item of team equipment to assist the equipment manager and athletic therapist, such as the skate sharpener, medical trunk, stick bag, or extra equipment bag. However, I also witnessed members of the coaching staff and veteran players assisting with these tasks at any given time. On the Storm, Mr. Burnett instituted a rule that we could not call players

“rookies”. Instead, we called them “first-year players”, if referring to them in any differentiating way.

13. I learned from both Mr. Richmond and Mr. Burnett that the attitude of the head coach can be contagious to the rest of the team staff and players alike. Their mentalities taught me to go the extra mile to foster a positive team culture. In my coaching roles with the Steelheads and the Storm, I would conduct pre-draft interviews with draft-eligible goaltenders as well as their parents, who often had questions about billeting, education, and supervision. I would reassure them that both the Steelheads and the Storm organizations put equal emphasis on developing their players as both athletes and young men, and that they could be confident their son would be treated with respect. I would explain that the teams’ cultures supported inclusivity, and that their sons would be safe and looked after while they were away from home. I committed myself to keeping that promise throughout my four seasons coaching in the OHL.

14. I have experienced the culture and environment on four OHL teams over the course of my career. Every organization is different. I have been incredibly impressed by the leadership on all the teams I have been involved with and of the steps they have taken and continue to take in preventing “hazing”.

SWORN by Ryan Daniels of the City of Austin, in the State of Texas, before me at the City of Toronto, in the Province of Ontario, on October 31, 2021 in accordance with O. Reg. 431/20, Administering Oath or Declaration Remotely.



DocuSigned by:

Marshall Tongen

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Commissioner for Taking Affidavits
(or as may be)

DocuSigned by:

Ryan Daniels

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RYAN DANIELS

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

AFFIDAVIT OF RYAN DANIELS

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