

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

**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 YVES LACASSE
(Sworn October 29, 2021)

I, Yves Lacasse, of the City of Kamloops, in the Province of British Columbia, **MAKE OATH AND SAY:**

1. I am the former Security Officer for the Western Hockey League (the **WHL**), a volunteer position I held between 2014 and 2019. I helped develop the WHL's Player Impact Program alongside Ron Robison, Commissioner of the WHL, and the Calgary Police Services.

2. I joined the RCMP in 1986 and served in general duty, plainclothes, drug enforcement, covert operations and serious crime before entering the RCMP executive program. In 2005, I was promoted to the rank of Inspector and became the Operations Officer in Kamloops, British Columbia. In 2010, I was promoted to the rank of Superintendent and was appointed Officer in Charge of the Kamloops RCMP Detachment, a position I held until 2013.

3. I have been involved in the WHL since 2006, when I became a billet for Keaton Ellerby, a player on the Kamloops Blazers. My relationship with the Blazers management evolved and we jointly decided that the RCMP could play a leadership and mentoring role for the players. An informal program was developed, which eventually evolved into Project EDGE, which stands for Educate, Develop, Grow and Excel. Under Project EDGE, RCMP officers would give a presentation to the Blazers players, coaches and staff members at the beginning of the season on a range of topics, including bullying, drug addiction and social media. Throughout the season, RCMP officers and Blazers players would give presentations to elementary school students on similar topics. In this way, Project EDGE empowered players to be leaders and mentors. The RCMP officers worked closely with the Blazers throughout the season. I was the main contact.

4. In 2013, because of the success of the local project in Kamloops, Ron Robison approached me to lead the Security Network for the WHL. We agreed to formalize a league-wide, comprehensive training and education program for players called the Player Impact Program. Given that the WHL Head Office is located in Calgary, we partnered with the Calgary Police Services to develop the Player Impact Program. I worked closely with the Calgary Police Services in developing the program. The Security Network, which was implemented across the WHL in 2014, is part of the Player Impact Program. I was appointed Security Officer, head of the Security Network, upon its inception.

5. I am currently the President and Chief Executive Officer of Dawson Group, a family group of companies focused on road construction in British Columbia.

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 Experience as a Billet Family with the Blazers

7. My involvement with the WHL began when Dean Clark, the head coach and General Manager of the Kamloops Blazers at the time, asked me to volunteer as a billet for Keaton Ellerby, an NHL prospect who played four seasons with the Blazers from 2004 to 2008. Mr. Clark explained to me that Keaton was a good kid who would benefit from my mentorship and a structured environment. Keaton lived with my family from the start of the 2006-2007 season until he was assigned to another billet in March 2007 as a result of my increasingly busy schedule. Keaton was drafted 10th overall into the NHL by the Florida Panthers in 2007.

8. My second billet was Matthew Needham, who lived with me during the 2013-2014 season. Matthew was an upstanding player and person, and became the team captain. He helped shape a respectful and inclusive environment inside the Blazers' locker room. For example, he would often invite rookie players over to my house for team dinners or to watch movies in my basement rec room. I built an especially strong relationship with Matthew, and we stay in touch today.

9. Neither Keaton, Matthew, nor any other players ever told me about experiencing or witnessing any demeaning or humiliating hazing with the Blazers. They only ever spoke highly of the organization, and, as leaders on the team, were committed to reinforcing an environment where neither hazing nor bullying were tolerated. The only "initiation" I heard about from the players was that they would go to the movies as a team and the rookies would stand up in front of the audience in the theatre and sing a song of their choice.

My Experience with Project Edge

10. As I became more involved with the Blazers, I forged a strong relationship between the team and the RCMP. RCMP officers began presenting in players' classrooms on a range of topics, including bullying, drug addiction and social media. The success of this initiative inspired Project EDGE, which is still in operation today, although COVID-19 has impacted its logistics. Project EDGE teaches players and staff on the Blazers about the importance of empathy and respect, which, I believe, has had a positive influence on how players and staff treat each other both on and off the ice. Further, Project EDGE empowered players to act as leaders, by providing them with the opportunity to pass on what they learned to elementary school students.

11. My involvement as a billet family and with Project Edge enabled me to build close relationships with many Blazers players and team staff. My home became a hangout setting for players on the occasional weekend. On Sunday nights, players would come by to shoot pool, play ping pong and watch TV. I overheard their conversations many times, and never once heard any mention of hazing. I also built individual relationships with many players by taking them out for one-on-one meals. We would discuss a broad range of topics, including any personal or team issues they were having. No player ever mentioned any incidents of hazing to me during these discussions. I believe if hazing did occur, players would have told me given our close relationship. For instance, more than once, players confided in me that they preferred using marijuana to drinking. I consider these admissions to be an indicator of the trust and confidence they had in me, despite my being a police officer.

12. I worked alongside the Blazers' Athletic Trainer, Colin Robinson, who was very close with the players as well. If any instances of hazing occurred, I believe Mr. Robinson would know about it, and would have told me. Mr. Robinson never communicated to me that hazing occurred, or that he had any concerns that it was occurring secretly.

13. I still see many of the former Blazers regularly when the Blazers host their annual alumni golf tournament. The players all have fond memories of playing for the Blazers, speak very highly of Project EDGE (one player was influenced to become a police officer after his hockey career), and tell me how much they miss and cherish that period of their lives.

My Experience with the WHL Player Impact Program and Security Network

14. In 2013, when Ron Robison learned about the success of Project Edge, he asked me to work with the Calgary Police Services to institute a league-wide comprehensive training and

education program. That program became known as the Player Impact Program. The Player Impact Program covers topics such as responsible social media use, relationships and consent, drugs and alcohol, gambling, diversity issues and players acting as positive role models. The Calgary Police Service and the WHL collaborated on the development of the Player Impact Program.

15. As part of the Player Impact Program, to enhance the reporting mechanisms available to players, the WHL established the league-wide Security Network during the 2014-2015 season. Under the Security Network, a Club Liaison Officer is assigned to each of the 22 teams in the WHL. The Club Liaison Officers are local retired or active police officers, whose duties include coordinating the Player Impact Program presentation, serving as a mentor for players on each team, and taking any confidential complaints of players. The Club Liaison Officers employ a targeted approach based on the specific characteristics of the team to which they were assigned. The presence of police officers is not only a deterrent against hazing and other inappropriate conduct in the WHL, but the regular interactions with officers provides a sense of safety for many players.

16. I served as Security Officer, head of the Security Network, from 2014 to 2020. In this role, I conducted internal reviews and investigations to ensure each WHL team was operating in accordance with the league's policies and procedures. I also investigated any player complaints relayed by the Club Liaison Officers or concerns from Ron Robison himself about player safety or conduct. During my time with the Security Network, I do not recall investigating any complaints or concerns involving hazing.

17. In my experience, the attitude towards hazing has changed considerably over the years I have been involved with the WHL. Comparing my experiences playing minor hockey in Québec with my experiences with the Blazers and the Security Network, hazing incidents have plummeted. In my view, hazing used to occasionally occur in large part because players were often left unsupervised. Players today are rarely left unsupervised, and are more open to discussing their concerns and complaints with team management.

18. My career as an RCMP officer and my involvement in various capacities with the WHL since 2004 have provided me with a unique perspective on the issues in this case. My close relationship with the Blazers organization provided me with access to information about the player experience on an informal level. My role as the WHL's Security Officer provided me with information about the player experience on a formal level. As evidenced by the league-wide programs I have discussed in this affidavit, I believe the WHL goes to great lengths to ensure its teams create a safe space for players to develop both personally and professionally. I was personally involved in the development of two of these programs, and I believe they have been successful in educating players about why hazing damages both their professional and personal goals and dreams.

SWORN by Yves Lacasse of the City of Kamloops, 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 Tongon

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Commissioner for Taking Affidavits
(or as may be)

DocuSigned by:

Yves Lacasse

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YVES LACASSE

DANIEL CARCILLO et al.
Plaintiff

-and-

ONTARIO MAJOR JUNIOR HOCKEY LEAGUE et al.
Defendants

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PROCEEDING COMMENCED AT
TORONTO

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