

IMPORTANT NOTICE ABOUT THE CLASS ACTION LAWSUIT AGAINST GRENVILLE CHRISTIAN COLLEGE (“GCC”)

If You Attended and Boarded at GCC Between September 1973 and July 1997 (and you are not a child or grandchild of Charles Farnsworth and/or Alastair Haig and you have not previously validly opted-out) you are a Class Member and this Notice is for you.

Please read this notice carefully as it may affect your legal rights.

A Settlement has been reached between the parties in the GCC lawsuit and was approved by the Court. The all-inclusive amount of **\$10,875,000** has been paid by the Defendants’ Insurers to settle the class action in return for releases and a dismissal of the lawsuit.

A copy of the Settlement Agreement is available at: <https://gccsettlement.ca/en/documents>. You can also request a paper or electronic copy from Class Counsel or the Claims Administrator (contact information below).

If you are a Class Member, you may make a claim for payment under the Settlement. The deadline to make a claim is **OCTOBER 22, 2024**.

1. THE LAWSUIT

The class action lawsuit was commenced in 2008 by and on behalf of former boarding students of GCC, (who boarded/attended between September 1973 and July 1997). It took many years before the lawsuit was determined to be allowed to proceed by way of class action (“certified”), and many more years to make its way through a common issues trial and appeal therefrom.

The lawsuit alleged (and the Ontario Superior Court in 2020, and the Ontario Court of Appeal in 2021 have since affirmed) that GCC utilized practices and policies which amounted to child abuse: they created an environment of control, intimidation, and humiliation that fostered and inflicted enduring harms on its students.

Rather than proceed with the next stage of the class action: the individual class member claim determination stage, the parties were able to reach an agreement to settle the individual class member damages.

2. SETTLEMENT OVERVIEW

The Settlement is intended to provide closure and support for healing for Class Members. The financial compensation under the Settlement is meant to serve a symbolic function in acknowledging the harms endured by the Class Members. Key elements of the Settlement are that Class Members will not be subjected to an adversarial adjudicative process and the claims program is confidential and paper-based.

3. WHAT PAYMENTS ARE AVAILABLE UNDER THE SETTLEMENT?

The Settlement provides Class Members with two levels of compensation.

1. Group A- Common Experience Claim

- All Class Members share a Common Experience in having attended and boarded at GCC during the Class Period (September 1973 and July 1997) and having been subjected to controlling, demeaning, intimidating, and humiliating acts, as well as excessive physical and/or psychological punishment.
- Payments to Eligible Class Members under this category (“CEP”) will be determined based upon the amount of time they attended and boarded at GCC during the Class Period.

Less than 1 School Year ¹	\$ 1,500
1 School Year	\$ 3,000
1-2 School Years	\$ 6,000
2-4 School Years	\$ 12,000
4+ School Years	\$ 24,000

- Common Experience Claims require proof of/confirmation of Class Membership, along with the completion and execution of a Claim Form, including a statutory declaration.
- The Claims Administrator will be provided with a Class Member List to establish class membership and eligibility under this category, but additional documents may be required to support Class Membership. Claimants may be asked to provide additional documents and/or further information to prove their membership in the Class – without which, they may not qualify for payment.

¹ A school year is 10 months, between September and June.

2. Group B – Severe Psychological and/or Physical Harm and/or Sexual Abuse

- Class Members may seek additional compensation if they can provide objective evidence of severe psychological injury (i.e., mental-health illness/disorder diagnosis and treatment), or physical injury (i.e., surgery and/or ongoing physiotherapy) linked to their experiences at GCC, or incidences of sexual abuse.
- To qualify for additional compensation, claimants must provide:
 - i. A sworn/solemnly affirmed Impact Statement, along with objective evidence (medical records) of severe psychological injury (i.e., mental-health illness/disorder diagnosis), or physical injury (i.e., surgery and/or ongoing physiotherapy) linked to their experiences at GCC; and/or
 - ii. A sworn/solemnly affirmed Impact Statement detailing incidences of sexual abuse (including details relating to the time period, specific date(s) of the incident(s), location, individuals involved, witnesses, if any, and reports made, if any (and to whom those reports were made)).
- Payments in this category will be awarded based on a points-system. While claimants may qualify for compensation in this category for one or more reasons, *in no event will an award in this category exceed \$50,000.*
- If a claimant is denied compensation in this category, their CEP is unaffected.

Payment in any one of the categories is not guaranteed. Class Members must meet all eligibility requirements, including documentary/evidentiary requirements and filing deadlines. *In no event shall a claimant be awarded more than \$74,000 in total compensation* (“CEP” and Group B award combined).

4. MAKING A CLAIM

If you want to make a claim for payment, you must complete a Claim Form, and provide the required supporting documentation to the Claims Administrator by **OCTOBER 22, 2024.**

A copy of the Claim Form can be accessed on the Claims Administrator’s website, or by contacting the Claims Administrator:

Epiq Class Action Services Canada Inc.

Attention: GCC Settlement
P.O. Box 507 STN B
Ottawa, ON K1P 5P6

Toll-Free: 1-877-786-0546

Fax: 1-866-262-0816

Email: info@GCCSettlement.ca

Website: www.GCCSettlement.ca

If you require assistance in completing your Claim Form, or in answering any additional questions about the Settlement, you can contact the Claims Administrator (Epiq, above) or Class Counsel:

McKenzie Lake Lawyers LLP	
1800 -140 Fullarton Street London, ON N6A 5P2 Attention: <u>Chanele Rioux-McCormick or Christina Noble</u>	
Email: GCC@mckenzielake.com	
Torkin Manes LLP	Haber & Associates Lawyers
151 Yonge Street, Suite 1500 Toronto, ON M5C 2W7 Attention: Valerie Edwards	3370 South Service Road, 2nd Floor Burlington, ON L7N 3M6 Attention: Christopher Haber
Email: vedwards@torkinmanes.com	Email: christopher@haberlawyers.com
T: (416) 863 1188	T: (905) 639 8894

Website: <https://www.mckenzielake.com/the-grenville-christian-college-class-proceeding/>