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COURT FILE NUMBER: 1808-00144

COURT: COURT OF QUEEN'S BENCH
OF ALBERTA

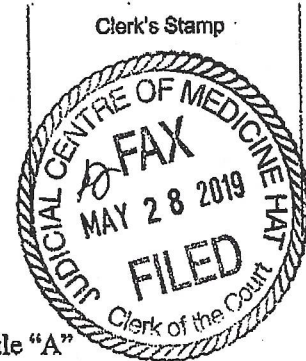
JUDICIAL CENTRE: MEDICINE HAT

APPLICANTS: P.T., and others, see attached Schedule "A"

RESPONDENT: HER MAJESTY THE QUEEN IN RIGHT OF
ALBERTA

INTERVENORS: CALGARY SEXUAL HEALTH CENTRE and
ASSOCIATION for REFORMED POLITICAL ACTION

DOCUMENT: AFFIDAVIT OF C.C.



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PARTY FILING THIS
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Schedule "A": Full Style of Cause

APPLICANTS:

P.T., D.T., F.R., K.R., P.H., M.T., J.V., A.S., R.M.,
UNIVERSAL EDUCATION INSTITUTE OF CANADA,
HEADWAY SCHOOL SOCIETY OF ALBERTA, THE
CANADIAN REFORMED SCHOOL SOCIETY OF
CALGARY, GOBIND MARG CHARITABLE TRUST
FOUNDATION, CONGREGATION HOUSE OF JACOB
MIKVEH ISRAEL, KHALSA SCHOOL CALGARY
EDUCATION FOUNDATION, CENTRAL ALBERTA
CHRISTIAN HIGH SCHOOL SOCIETY,
SADDLELAKE INDIAN FULL GOSPEL MISSION, ST.
MATTHEW EVANGELICAL LUTHERAN CHURCH
OF STONY PLAIN, ALBERTA, CALVIN CHRISTIAN
SCHOOL SOCIETY, CANADIAN REFORMED
SCHOOL SOCIETY OF EDMONTON, COALDALE
CANADIAN REFORMED SCHOOL SOCIETY,
AIRDRIE KOINONIA CHRISTIAN SCHOOL
SOCIETY, DESTINY CHRISTIAN SCHOOL SOCIETY,
KOINONIA CHRISTIAN SCHOOL-RED DEER
SOCIETY, COVENANT CANADIAN REFORMED
SCHOOL SOCIETY, LACOMBE CHRISTIAN
SCHOOL SOCIETY, PONOKA CHRISTIAN SCHOOL,
PROVIDENCE CHRISTIAN SCHOOL SOCIETY,
LIVING WATERS CHRISTIAN ACADEMY, NEWELL
CHRISTIAN SCHOOL SOCIETY, SLAVE LAKE
KOINONIA CHRISTIAN SCHOOL, YELLOWHEAD
KOINONIA CHRISTIAN SCHOOL SOCIETY, THE
RIMBEY CHRISTIAN SCHOOL SOCIETY, LIVING
TRUTH CHRISTIAN SCHOOL SOCIETY,
LIGHTHOUSE CHRISTIAN SCHOOL SOCIETY,
DEVON CHRISTIAN SCHOOL SOCIETY,
LAKELAND CHRISTIAN SCHOOL SOCIETY, 40
MILE CHRISTIAN EDUCATION SOCIETY, HIGH
LEVEL CHRISTIAN EDUCATION SOCIETY,
PARENTS FOR CHOICE IN EDUCATION, and
ASSOCIATION OF CHRISTIAN SCHOOLS
INTERNATIONAL – WESTERN CANADA

RESPONDENT:

HER MAJESTY THE QUEEN IN RIGHT OF ALBERTA

INTERVENORS:

CALGARY SEXUAL HEALTH CENTRE and
ASSOCIATION for REFORMED POLITICAL ACTION

AFFIDAVIT OF [REDACTED] (to be anonymized as "C.C.")

Sworn on March 15, 2019

I, [REDACTED] of the Town of [REDACTED], in the Province of Alberta,
SWEAR AND SAY THAT:

1. I am the mother of B.B., a 15-year-old boy in grade 10 who swore an Affidavit as part of this matter on January 18, 2019 (filed February 12). I have personal knowledge of the facts herein deposed except where based on information and belief, in which case I verily believe same to be true.

Background

2. On May 11, 2018, my son attended a gay-straight alliance conference (the "GSA Conference") at the prompting of staff at [REDACTED] a public school he attends in Chinook's Edge School Division No. 73 ("[REDACTED]").
3. I was not notified by anyone at [REDACTED] in advance that my son would miss all his classes on May 11 to attend the GSA Conference. [REDACTED] did not inform me after the fact that my son had been at the GSA Conference. I did not give my permission at any time for my son to be absent from his classes to attend activities off school grounds that I had not been apprised of.
4. The materials my son received at the GSA Conference, attached to his Affidavit as Exhibits "A" through "C" (the "Materials"), are of grave concern to me as a parent. Not only do the Materials encourage and promote sexual promiscuity, but the flipbook attached as Exhibit "B" of my son's Affidavit graphically depict a man having sexual relations with a boy. At no time did I give my consent to the school to take my son off school grounds for the purpose of promoting sexually explicit materials and actions to him.

5. Included in the Materials provided to my son were 153 condoms and lubricant packages. It is apparent that the message conveyed to the approximately fifty (50) children at the GSA Conference was “go experiment sexually” and “perform the acts that you have seen depicted.” This message is directly contrary to my own efforts to educate my son about sexuality, including in regard to morality and the risk of sexually transmitted disease.
6. I am indignant and alarmed at [REDACTED] staff and all those who were involved (such as the Calgary Sexual Health Centre, who I understand was an organizer of the GSA Conference) in these attempts to sexualize children.

Complaint to [REDACTED] and School Trustee

7. I have reviewed the Affidavit of Wendy Boje, Assistant to the Deputy Minister of Education, sworn on November 11, 2018 and filed at the Court of Appeal on November 23. Ms. Boje appears to insinuate at paragraph 29 of her Affidavit that the GSA Conference did not occur, that the Materials were not provided to my son, and/or that I did not make a complaint to anyone regarding the GSA Conference.
8. I met with the principal of [REDACTED], [REDACTED] in May 2018 following my discussions with my son about the GSA Conference. I voiced my alarm to [REDACTED] about the Materials provided to my son, the school’s role in their introduction, and my objection to the school taking my son off grounds without permission from me for this type of activity. In response, [REDACTED] told me that, had [REDACTED] brought to my attention the GSA Conference and the Materials, the school would not be in compliance with Bill 24’s amendments to the *School Act* and, as a result, there would be the potential for job losses.
9. I have also had email correspondence, and an in-person meeting with school trustee [REDACTED]. Attached to my Affidavit as Exhibit “A” is my email to School Trustee [REDACTED] of May 30, 2018, in which I outlined my concerns

[3]

regarding the Materials and their impact on children, including my impressionable son, and Trustee [REDACTED] response.

10. I am profoundly dissatisfied with the response of [REDACTED] to my concerns.

11. I swear this Affidavit bona fide and for no improper purpose.

SWORN BEFORE ME at [REDACTED], Alberta,)
this 15th day of March 2019.)

JAMES KITCHEN
Barrister and Solicitor
A Commissioner for Oaths in and for
the Province of Alberta

[REDACTED]

From: [REDACTED]
Sent: Wednesday, May 30, 2018 4:49 PM
To: [REDACTED]@cesd73.ca'
Cc: [REDACTED]
Subject: Concerns with disclosure regarding school programs
Attachments: photo 1.jpg; Photo 2.jpg; photo 3.jpg; photo 4.jpg; photo 5.jpg; photo 6.jpg

Good afternoon [REDACTED]

Thank you for taking the time to speak with [REDACTED] yesterday about my concerns with some of the activities that my son has been involved with as well as what I feel is inappropriate content that has also been provided to the students at these activities. From my understanding there was a GSA (Gay Straight Alliance) conference that was held at the community hall in [REDACTED] on either May 10th or 17th I believe. The students were allowed to choose to attend and needed no parental consent to do so. From what I have heard, they watched drag kings and queens perform at this event and were sent home with some goodie bags full of condoms, lube, business cards. The photos of the little book "Who's got the Condom" is a flip book...I included a few photos of just a few of the pages.

I completely understand the need for sex education however, I really feel as if this is crossing some lines on what is appropriate. I have been advised that the students are allowed to join the GSA group and attend these events in town with no parental consent and the school is not at liberty to let parents know about this. My son has been struggling at this school for a few years now. He has been through a lot of bullying and has also had a lot of his own behavioral issues. He is involved with a psychologist, has been diagnosed with ADHD which he is being medicated for, and we continue to work with a counsellor as well. All of which the school is aware of. A few days before this convention my son started wearing makeup at school as well as dressing in ladies clothing. Of course I was not aware of this. I then found a story that my son had written in his bedroom about a boy who wanted to be a drag queen... long and short of it....the boy ends up committing suicide. I have met with [REDACTED] to advise him of this and express my concerns. This is a 15 year old boy who is very easily influenced. He is struggling to find a safe place where he feels that he belongs. He was even identifying as being bi-sexual while at school but when we had a talk about it, found that he wasn't even aware of what that meant. Unfortunately he will do anything or be whoever he thinks he needs to be in order to fit in.

In my opinion, there are some serious things that need to be addressed here. What if this had all managed to be kept secret from me as it was intended to be and my son had hurt himself as his story suggested. How are we as parents supposed to be there and support our kids if we are intentionally being kept in the dark about these things. My son has always had my full love and support at home. At the end of the day, if he decides that he is gay or that he wants to be a drag queen then so be it. I love my child. He is going through a very challenging time in his life and I am doing the best that I can to get him through this. This lack of disclosure from the school is not helping my ability to do so.

[REDACTED]

THIS IS EXHIBIT " A "
referred to in the Affidavit of

C. C.
Sworn before me this 15
day of March A.D. 20 19

[Signature]
A Commissioner in and for the Province of Alberta

James Kitchen
Barrister & Solicitor

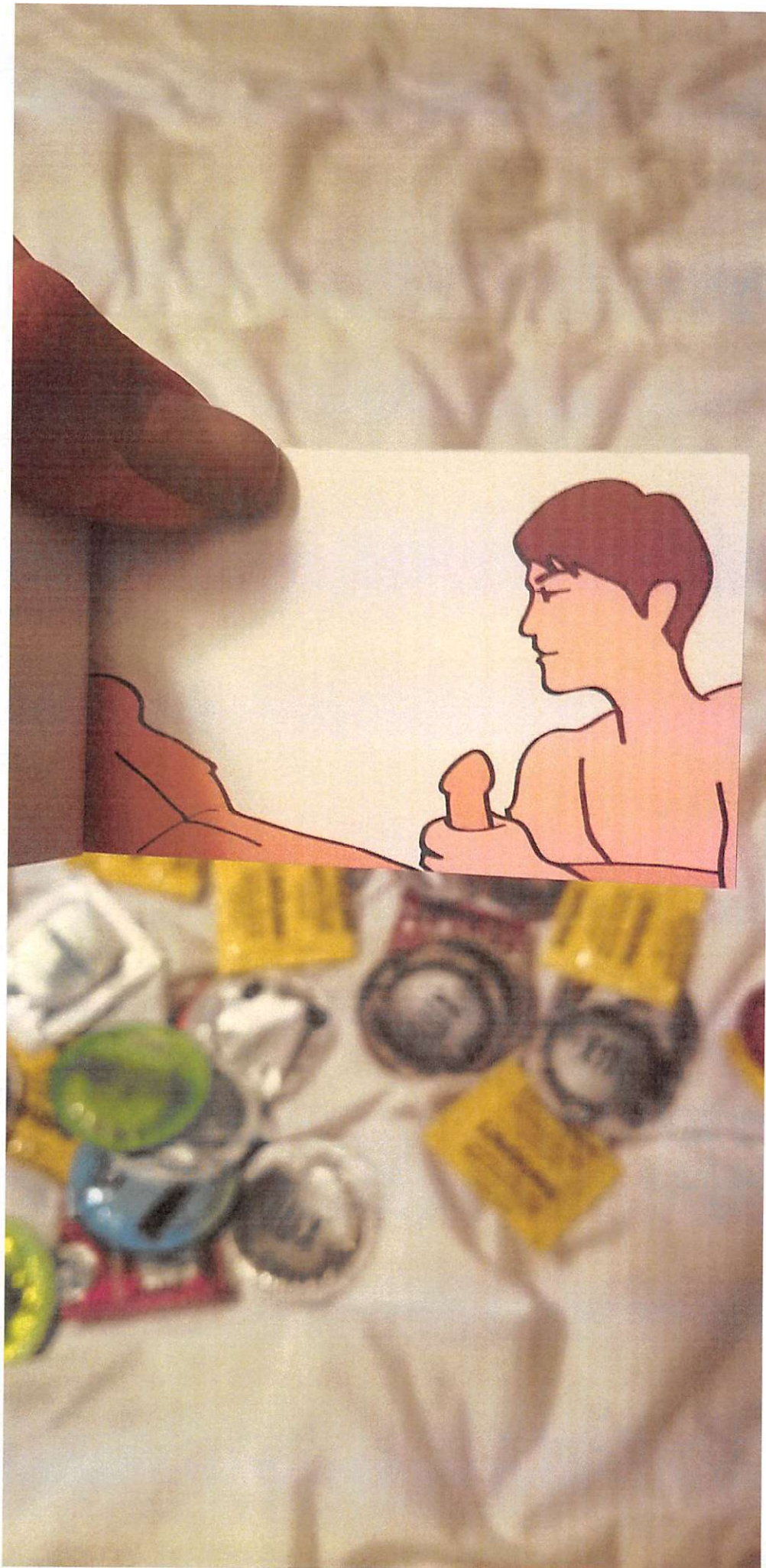
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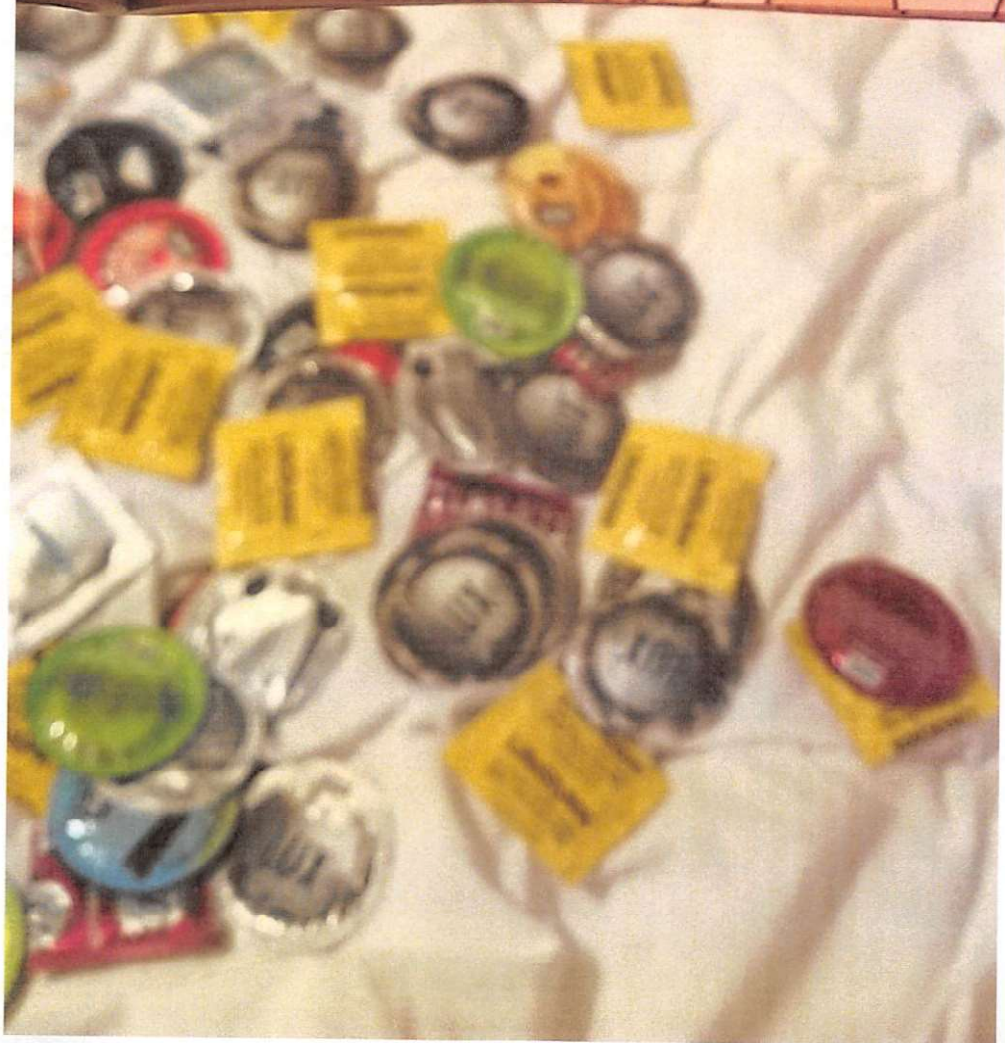
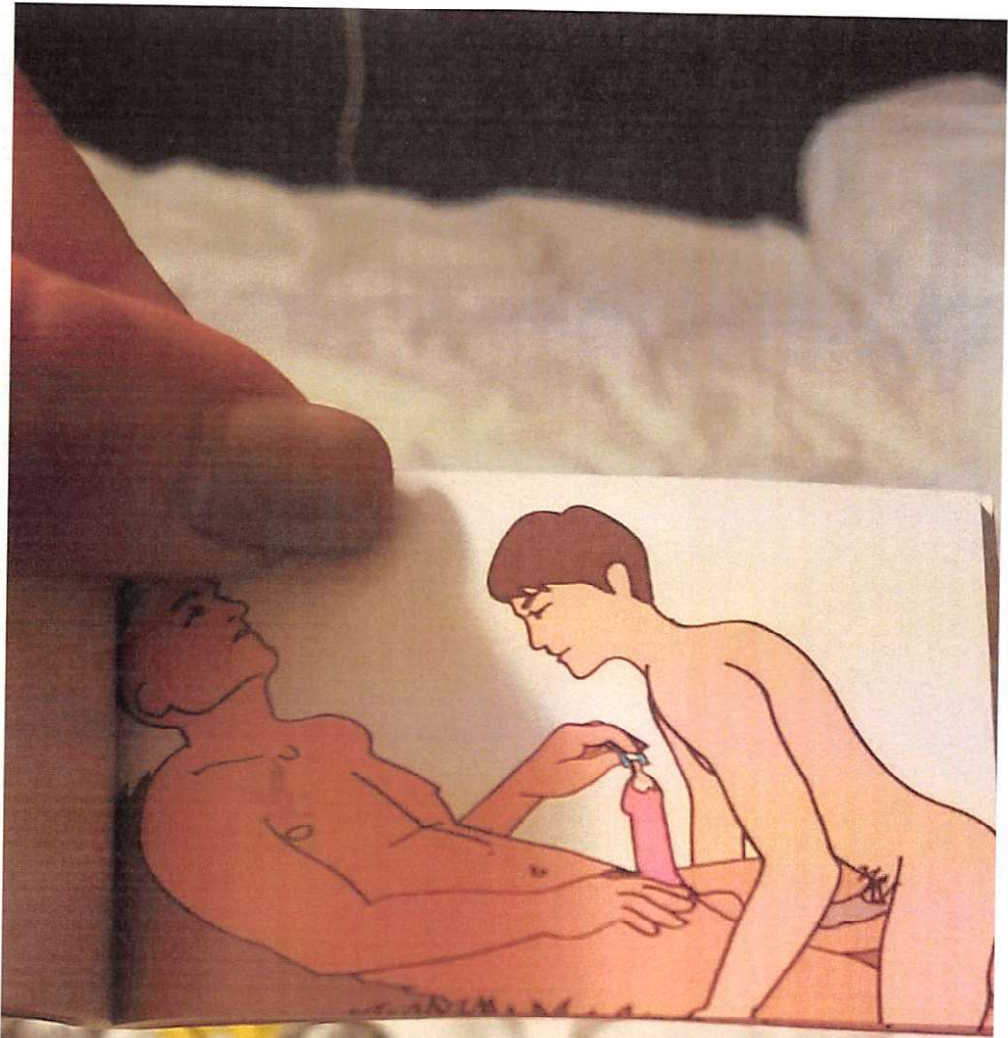
Also, for your protection, coverage cannot be bound or changed via voice mail, email, fax or online via [REDACTED] website, and is not effective until confirmed with a [REDACTED]

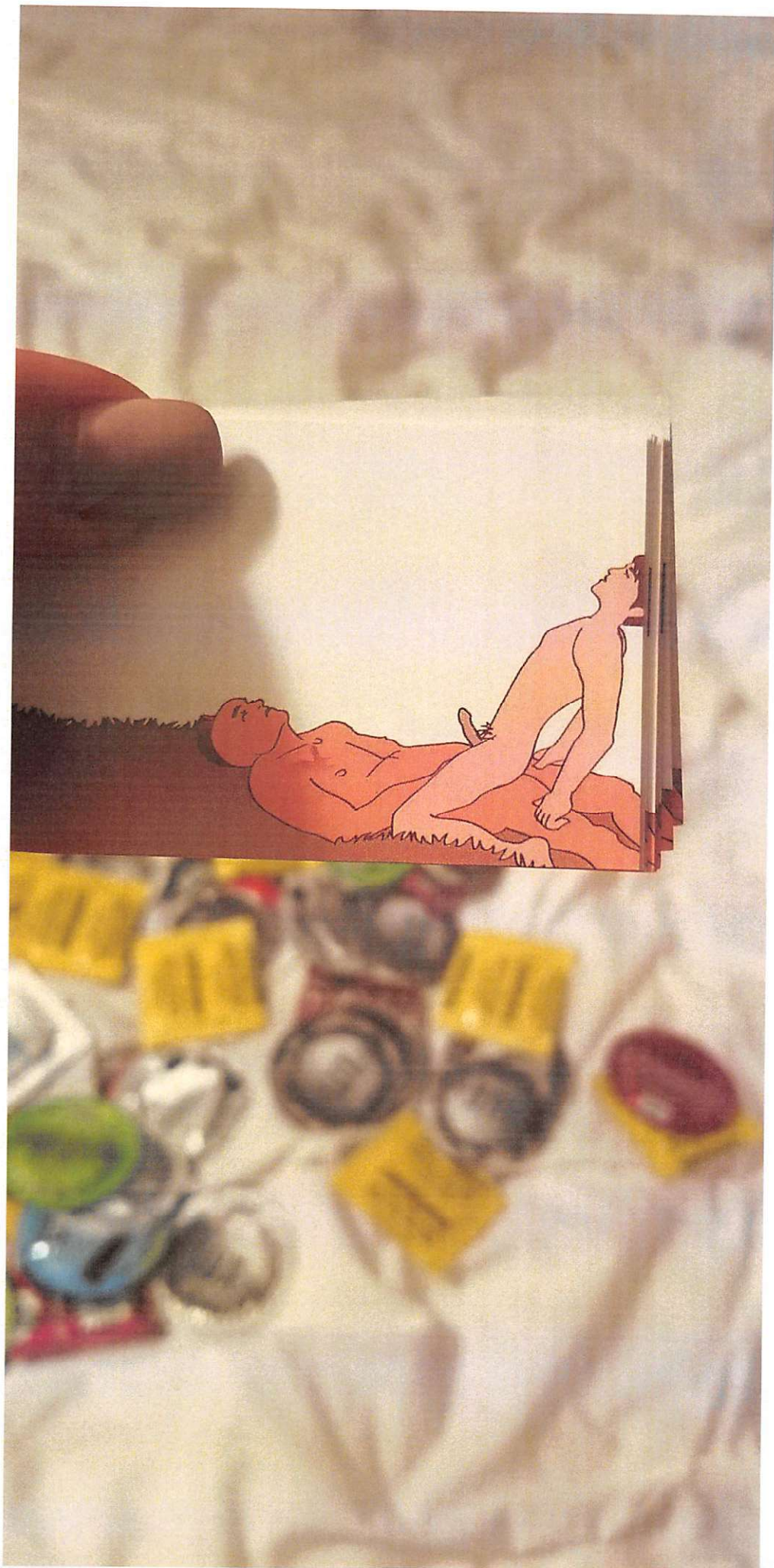


Who's
got the
Condom?



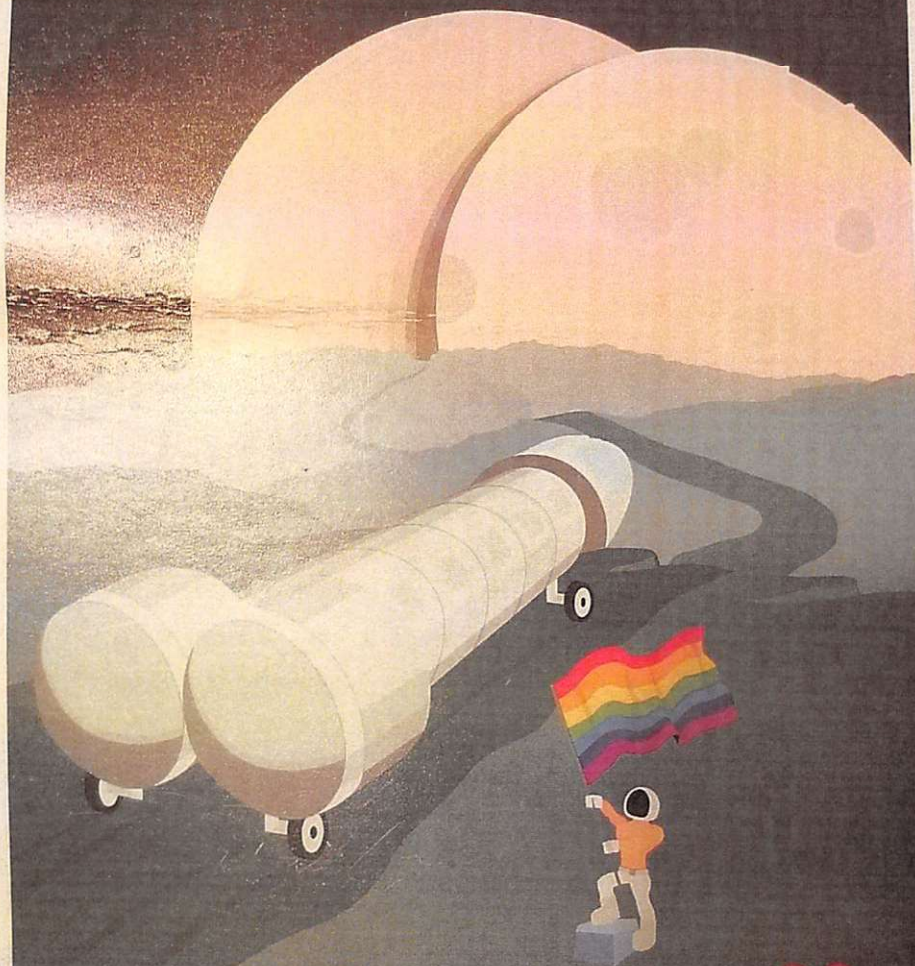






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[REDACTED]

From: [REDACTED]@cesd73.ca>
Sent: Thursday, May 31, 2018 5:32 PM
To: [REDACTED]
Subject: Re: Concerns with disclosure regarding school programs

Hello [REDACTED]

My apologies for my delay. I have been working on this for you and apologize that you won't see this response till the morning. Thank you for recapping the events and sharing the photos. I have more information on this that I am happy to share with you. Would you be available tomorrow afternoon say 330 for a coffee at [REDACTED]. If you are comfortable having [REDACTED] join us as well, then I could share the next steps with you both.

Thank you for bringing this forward,

[REDACTED]

On Wed, May 30, 2018 at 4:44 PM, [REDACTED] wrote:

Good afternoon [REDACTED]

Thank you for taking the time to speak with [REDACTED] yesterday about my concerns with some of the activities that my son has been involved with as well as what I feel is inappropriate content that has also been provided to the students at these activities. From my understanding there was a GSA (Gay Straight Alliance) conference that was held at the community hall in [REDACTED] on either May 10th or 17th I believe. The students were allowed to choose to attend and needed no parental consent to do so. From what I have heard, they watched drag kings and queens perform at this event and were sent home with some goodie bags full of condoms, lube, business cards. The photos of the little book "Who's got the Condom" is a flip book...I included a few photos of just a few of the pages.

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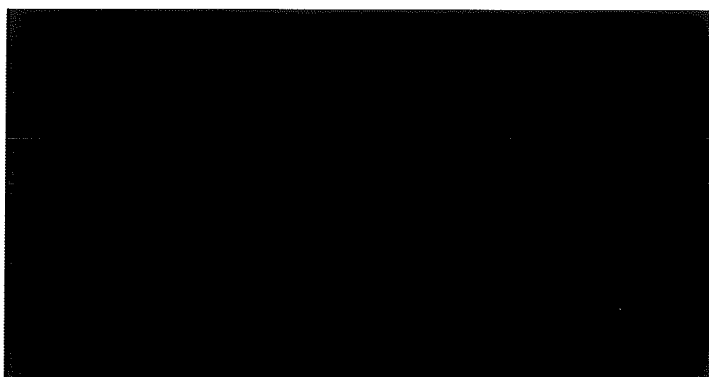
[REDACTED]

From: [REDACTED]
Sent: Friday, June 01, 2018 9:03 AM
To: [REDACTED]
Subject: RE: Concerns with disclosure regarding school programs

Good morning [REDACTED]

I really appreciate you looking into this. I would love to meet with you this afternoon. [REDACTED] will be attending as well. We also have another lady in our office, [REDACTED] who has met with [REDACTED] regarding some of these concerns. Would you be comfortable with her joining us as well?

Thank you,



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Also, for your protection, coverage cannot be bound or changed via voice mail, email, fax or online via [REDACTED]'s website, and is not effective until confirmed with a [REDACTED]

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Thank you for bringing this forward,

[REDACTED]