

COURT FILE NUMBER

1808-00144

Clerk's Stamp

COURT

COURT OF QUEEN'S BENCH  
OF ALBERTA

JUDICIAL CENTRE

MEDICNE HAT

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, SADDLE LAKE  
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, PROVIDENCE CHRISTIAN SCHOOL  
SOCIETY, LIVING WATERS CHRISTIAN ACADEMY,  
NEWELL CHRISTIAN SCHOOL SOCIETY, SLAVE  
LAKE KOINONIA CHRISTIAN SCHOOL, PONOKA  
CHRISTIAN SCHOOL SOCIETY, YELLOWHEAD  
KOINONIA CHRISTIAN SCHOOL SOCIETY, THE  
RIMBEY CHRISTIAN SCHOOL SOCIETY, LIVING  
TRUTH CHRISTIAN SCHOOL SOCIETY, LIGHTHOUSE  
CHRISTIAN SCHOOL SOCIETY, PARENTS FOR  
CHOICE IN EDUCATION, and ASSOCIATION OF  
CHRISTIAN SCHOOLS INTERNATIONAL - WESTERN  
CANADA,

RESPONDENT

HER MAJESTY THE QUEEN IN RIGHT OF ALBERTA

DOCUMENT

AFFIDAVIT of P.T.

ADDRESS FOR SERVICE  
AND CONTACT  
INFORMATION OF  
PARTY FILING THIS  
DOCUMENT

**Justice Centre for Constitutional Freedoms**  
#253, 7620 Elbow Drive SW  
Calgary, AB, T2V 1K2  
Attention: J. CAMERON and M. MOORE  
Telephone: 403-909-3404  
Facsimile: 587-747-5310

**AFFIDAVIT OF P.T.**Sworn on April 4, 2018

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

1. I am a [REDACTED] Consultant and have a Bachelor of Science in [REDACTED]. I am a married father of [REDACTED] children, [REDACTED] of whom suffer from a form of Autism Spectrum Disorder (ASD). My wife, D.T., and I have enrolled each of our children in [REDACTED] Board of Education ([REDACTED]) public schools. 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.
2. Use of the terms such as “we”, “us” and “our” references my wife D.T. and myself.
3. Use of the term “our daughter” references our [REDACTED] child.
4. As of the date of this affidavit, our daughter is [REDACTED] years of age. We love and cherish our daughter. Raising her has been challenging as she has struggled with various mental health problems, and with her social skills. She is very vulnerable because she tends to be naïve, credulous, and will do almost anything to be liked by others, even if it is detrimental to herself.
5. Our daughter entered [REDACTED] at a new school, at the age of [REDACTED], in September of 2015. She was happy to start at a new school and excited to make new friends.
6. A year later, by December 2016, our daughter had become severely depressed and suicidal. We were forced to remove her from school and keep her home for two months to ensure her safety and address her condition. We only discovered afterwards, once our daughter was able to explain to us what had happened, that our daughter’s participation in the Gay-Straight Alliance (“GSA”) at her school was the primary catalyst for her downward spiral.
7. We were never fully or properly informed by our daughter’s school, prior to December 2016, about the nature of the GSA our daughter attended, the degree to which our daughter participated in it, or the nature and severity of her struggles with the suggestions of her peers and teachers regarding sexuality, gender, and identity.

8. Our daughter could have lost her life because her school chose to withhold information from us as parents. The *School Act* now requires information about our vulnerable daughter to be withheld from us in regard to GSA meetings or GSA-related activities, which re-endangers our daughter's mental stability and emotional wellbeing. If she begins to again participate a GSA, we will not know. If within the confines of such a club, she is encouraged to experiment, sexually or psychologically, it will be illegal to inform us. This threatens our daughter's safety, and it prevents us from helping her in whatever new peril she may find herself in.

### **Background**

9. Our daughter was diagnosed with Autism Spectrum Disorder: Pervasive Developmental Delay Not Otherwise Specified (“ASD”) at the age of five, and with Attention Deficit Hyperactivity Disorder (“ADHD”) at the age of eight. Attached to this Affidavit as **Exhibit “A”** is a psychological assessment that discusses these diagnoses. As noted in the assessment, our daughter had “very poor social judgment” at the time of the assessment. Improvement in this regard has been minimal. Our daughter continues to struggle emotionally and socially; she strongly desires friends and to be liked by her peers, but rarely achieves this goal due to her lack of social skills.
10. D.T. and I both take an active role in supporting our children in their education and development. We regularly assist them doing homework, frequently discuss their school day with them, attend parent teacher interviews and maintain frequent communication with their teachers.
11. D.T. and I believe that God creates people either male or female, and this is also biological reality. As parents, D.T. and I have sought to raise our children to embrace their God-given identity and potential, and to understand and accept the scientific reality that sex and gender are determined by biology. Our intention has always been to protect our children from activities that would undermine our ability to raise our children in accordance with our religious beliefs regarding God’s design and intention for human sexuality. We also believe and teach our

children that engaging in sexual activity outside the context of a marriage between one man and one woman is morally wrong.

12. Having children with disabilities, D.T. and I recognize the importance of understanding the unique differences, including strengths and weaknesses, each of our children have, and providing care and support to each of them in light of their unique traits and struggles.
13. A consequence of her ASD is a deficiency in emotional regulation which has caused her to have socialization problems. Attached to this Affidavit as **Exhibit "B"** is a 2013 academic article titled "The Role of Emotion Regulation in Autism Spectrum Disorder RH: Emotion Regulation in ASD" which discusses this issue.
14. Our daughter is often isolated and with few friends. We have been informed that people with ASD sometimes have a difficult time making close friends, and that it is common for girls with ASD to be somewhat "tomboy-ish" regarding their activities and to socially relate better to males. Attached to this Affidavit as **Exhibit "C"** is a 2011 report titled, "Brief Report: Female-To-Male Transsexual People and Autistic Traits". My wife and I supported our daughter in her interests. We have not tried to pressure or to conform her interests, activities, or social life to things stereotypically associated with females.

#### **Fall 2015**

15. In September 2015, our daughter began attending a [REDACTED] public school (herein after referred to as "our daughter's school", "her school" and "the school") that offered an ASD "cluster" program for students with learning disabilities such as ASD (the "ASD Program").
16. We communicated regularly with the primary ASD Program teacher (the "ASD Program Teacher") as she oversaw many aspects of our daughter's education.
17. Our daughter began the 2015 school year described as "mostly happy" and "confident" by the ASD Program Teacher (see September 1, 2015 email attached to this Affidavit as **Exhibit "D"**). Despite experiencing some anxiety, our daughter initially did well in the ASD Program. She made progress in her studies and made friends with another girl, also in the ASD Program.

18. On October 28, 2015 we had a regular parent-teacher meeting with the ASD Program Teacher. The ASD Program Teacher mentioned at this meeting that there was a new “club” starting at the school that she was excited about and thought it would be good for our daughter to attend. The ASD Program Teacher said she could not share any details about the “club” to us, but that our daughter was likely to make many new friends. Unfortunately, we did not press for further details regarding the “club”. We mistakenly assumed it was some type of socializing club where our daughter could improve her social skills and make friends, which is something we wanted for her and knew would be good for her.
19. In December 2015, we started to notice that our daughter was growing more emotional and anxious. The friend our daughter had made no longer wished to be her friend. We arranged for our daughter to meet with her psychologist. We now know that our daughter, who was [REDACTED] years of age at the time, had been attending the school’s GSA since sometime in early November 2015. The GSA was new to the school in the fall of that year. We later learned that our daughter became aware of the GSA, which met during the lunch break, because her ASD Program Teacher and our daughter’s primary Educational Assistant (the “Educational Assistant”) promoted it directly to the students in the ASD Program, including our daughter, and encouraged our daughter to attend.

#### **Introduction and Experience at the GSA**

20. Our daughter’s behaviour and demeanor began to change dramatically in November 2015, with the commencement of her attendance at her school’s GSA.
21. In November 2015, our daughter typically played the Pokémon card game with her peers, an activity she enjoyed. On the date of the first GSA meeting, our daughter informed us she was getting ready to play Pokémon with her peers when the ASD Program Teacher and the Educational Assistant both implored her to join them in attending the GSA. Although preferring to play Pokémon, she decided to attend the GSA meeting.
22. The meeting started with each person stating their name and their “preferred pronoun”. Our daughter stated her full female first name and said that she went by

“she”. Next was a PowerPoint presentation regarding the “Gender Spectrum”, followed by each student declaring their “identity”. These “identities” included “bisexual”, “lesbian”, and “gay”. Our daughter, being only [REDACTED] years of age and rather innocent and curious, asked what “bisexual” meant. Upon being told that “bisexual” referred to people who are physically or sexually attracted to both sexes, our daughter immediately declared that she was a “bisexual”, too. There were about half a dozen students in attendance at the first GSA meeting.

23. We now know that shortly thereafter, at a subsequent GSA meeting, our daughter asked what “transgender” meant. She was told that “transgender” describes the situation when a person’s gender does not match what was “assigned” at birth. By the end of that particular GSA meeting, our daughter decided that she was also “transgender”. Before she left that GSA meeting, she was given a booklet by someone at the GSA entitled “I think I Might Be Transgender, Now What Do I Do?” (the “Booklet”). We were not aware at the time that she had been given the Booklet. We have since reviewed the content of the Booklet, a copy of which is attached to this Affidavit as **Exhibit “E”**).
24. The Booklet states that “transgender people feel that the gender to which they were born, or assigned at birth, does not fit them”. When our daughter was given this booklet she was a credulous, [REDACTED]-year-old autistic girl. She completely lacked the maturity, discretion, and understanding to make informed, responsible decisions regarding her gender. The Booklet also states that “there is no obligation to tell anyone about your identity”.
25. The Booklet cites the experiences of adults, not children. It reads like a sales pamphlet, with no negative testimonials and statistics, and ignoring the experience of people who are profoundly disillusioned with their “transition”. The Booklet also states, “Others feel (when they come out) as if they are thrown into a lion’s den, with challenges from parents, friends, and family”. My wife and I are profoundly saddened and upset that the school was willing to promote and distribute material that informs children they will feel like “they are being thrown into a lion’s den” when sharing honestly with parents and family. This is irresponsible, and a breach of the trust that we placed in the school, to tell our

daughter, a vulnerable intellectually-disabled girl, that essentially everyone was likely to be against her. Putting children, especially vulnerable children with autism, through this harmful and anxious situation is cruel and dangerous.

26. My daughter has informed us that she read the entirety of the Booklet upon receiving it, and that it convinced her at the time that she was “transgender”.
27. Our daughter continued to attend the GSA meetings. In one of the GSA meetings prior to the 2015 Christmas break, she was taught about “packers”. “Packing”, I am informed, is the act of wearing something between one’s legs to give the appearance of the presence of a penis and testicles. Attached to this Affidavit as **Exhibit “F”** is an article published by the BC Provincial Health Services Authority’s Transgender Health Information Program that discusses “packers”. At [REDACTED] years of age, our daughter was being taught about how to wear a fake penis to make others think she was a male. Neither her school nor her teachers informed us that our daughter was being taught these things.
28. We have since learned that shortly after attending the first GSA meeting, our daughter began to pretend to be a boy at school. She has since told us she liked pretending to be a boy, partly because she was very much a “tomboy” in personality and interests, but more so because she enjoyed the special attention she received, and the new friends she believed she had made. She found that pretending to be a boy at school made her very popular.
29. Over time, the distinction between reality and fantasy was blurred, and our daughter increasingly started to “self-identify” as a boy at school, instead of just pretending. This caused her to live a “double-life”: living as the female she was at home, while “self-identifying” as a male while at school.

#### **Events of January – June 2016**

30. Our daughter, unbeknownst to us at the time, continued to attend the GSA from January to June 2016.
31. Matters worsened regarding our daughter’s emotional and psychological condition in February 2016. The ASD Program Teacher informed us on February 24, 2016

(email attached to this Affidavit as **Exhibit "G"**) that our daughter was acting strangely and speaking unkindly to the ASD Program Teacher. Our daughter has since told us that the ASD Program Teacher made her feel very uncomfortable, but that she felt like we trusted her, and that if her parents trusted the ASD Program Teacher that meant the ASD Program Teacher was trustworthy. She also has told us that when she first started attending the school she believed that all adults were right, and that she should trust the people we entrusted her to.

32. On March 8, 2016, the ASD Program Teacher told us via email (attached to this Affidavit as **Exhibit "H"**) that our daughter had become "very sad overall" and had "closed herself off".
33. Unaware of what could be causing our daughter's depressed emotional state and strange behaviour, we responded by arranging for our daughter to meet more often with her psychologist, and to meet with a psychiatrist. In an email sent to the ASD Program Teacher on March 9, 2016 (attached to this Affidavit at **Exhibit "I"**), we candidly speculated about the various factors that could be contributing to our daughter's struggles with anxiety and depression. Unfortunately, the ASD Program Teacher withheld from us that our daughter was regularly attending a GSA, and that she was "self-identifying" as a boy at school, and that she now thought of herself as "bisexual" and "transgender".
34. Meanwhile, sometime in March 2016, in response to suggestions from a fellow GSA-attending student, our daughter began using male pronouns to refer to herself and adopted a male first name. She requested that her teachers use her male name and pronouns, and they did so. This dramatic change was also not communicated to us.
35. In a March 15, 2016 email (attached to this Affidavit as **Exhibit "J"**), the ASD Program Teacher told us our daughter had stated she was "very stressed-out by everything". My wife and I had several lengthy conversations about this, confused as to the source of our daughter's anxiety. Little did we know!
36. The ASD Program Teacher also stated in this email that our daughter had formed a close bond with her Educational Assistant. At the time, we had no cause for



alarm regarding this state of affairs and, in fact, considered it a positive development. However, we now know that this same Educational Assistant, in addition to imploring our daughter to attend the first GSA meeting, accompanied our daughter to the first five GSA meetings. As mentioned above, at one of these early GSA meetings, our daughter impulsively declared herself to be “bisexual” even though she had only just learned about the term and the concept. The Educational Assistant, who was in attendance at this GSA meeting, immediately responded “that is totally fine!”. Instead of conducting herself as a reasonable adult, responsible for the care of our [REDACTED] year-old intellectually-disabled daughter, by helping her to think through such things, she enabled and encouraged our daughter to “self-identify” with labels she did not, and could not have, properly understood.

37. Our daughter has since informed us that once she started attending the GSA meetings in the fall of 2015, her Educational Assistant continually encouraged our daughter to “self-identify” as “transgender”, as a boy, and to “transition”. This type of behaviour on the part of an adult in a position of trust and authority over our daughter is unacceptable. We are shocked to hear that our daughter’s Educational Assistant was influencing our daughter in this manner, and thereby contributing to her confusion and anxiety regarding her gender.
38. On April 7, 2016, we received an email from the ASD Program Teacher (attached to this Affidavit, as **Exhibit “K”**), in which the ASD Program Teacher stated, rather oddly and cryptically, that our daughter had been “deeply reflecting on her self-identity at this time.” Unsure of what the ASD Program Teacher was referring to by “self-identify”, we nonetheless were not overly concerned as we generally trusted the ASD Program Teacher to have our daughter’s best interests in mind and to be candid with us if there was anything we should know regarding our daughter.
39. Then, at a parent-teacher meeting on April 21, 2016, we were informed, for the first time and nearly six months after the fact, that our daughter had been attending a GSA at her school. My wife and I were surprised. But, not knowing anything about GSAs, except, as we were told, that they were intended to reduce bullying,

we were not concerned. We thought it would be a good opportunity for her to show kindness and be empathetic towards those experiencing bullying for being gay, or for any other reason. At that time, we thought our daughter was attending the GSA because she supported anti-bullying efforts and wanted to show her support. We thought this, in part, because we believed that if our daughter was attending the GSA for reasons relating to her own struggles with gender or sexuality, that the school would inform us.

40. On May 4, 2016, we visited our daughter's psychologist and psychiatrist (the "May 4 Meeting"). They opined that she had developed Gender Dysphoria. We were surprised that the Gender Dysphoria label was so readily applied to our daughter, but, of course, we were as yet unaware that she had been "self-identifying" as a boy at school and that the school had been encouraging this and hiding their activities from us. We well understood that our daughter was a "tomboy" and saw no need for concern in that regard.
41. Upon telling us at the May 4 Meeting that our daughter had Gender Dysphoria, the psychologist and psychiatrist immediately proposed puberty blocking drugs and potentially surgery as a treatment response. We were shocked at the drastic and invasive treatment recommended.
42. At the same meeting, with both my wife and our daughter present in the room, the psychiatrist directly asked our daughter if she wanted a penis. She emphatically answered "no!".
43. A few days later, the ASD Program Teacher sent us an email on May 9, 2016 (attached to this Affidavit as **Exhibit "L"**), in which she informed us, for the first time, that she was aware our daughter had been struggling with her sexuality and gender. We were advised by the ASD Program Teacher that the school had told our daughter about a "local transgender clinic". The ASD Program Teacher suggested we consider sending our daughter to the clinic. Attached to the email was a 2014 document published by the Canadian Psychological Association titled "'Psychological Works" Fact Sheet: Gender Dysphoria in Children"(the "2014 CPA Gender Dysphoria Fact Sheet", attached to this Affidavit as **Exhibit "M"**).

48. Our knowledge in May 2016 was still limited. We were not yet aware that our daughter was “self-identifying” as a boy at school, and were not informed of this by the school until September 2016). Neither the school, nor the psychologist who considered her to be Gender Dysphoric, informed us of this. At the time, our understanding was that she was experiencing a “tomboy” phase as she struggled with puberty and the onset of menstruation.
49. We were also still unaware of the true nature of the GSA, although we began to suspect that the group was more than merely an anti-bullying socializing club. Based on the name “gay-straight alliance, we wrongly assumed the club was limited to matters regarding sexual orientation. We were concerned that the GSA may have a negative impact on our daughter’s understanding of her sexual orientation. We did not yet realize that the impact of the GSA upon our daughter was different and much worse.
50. I expressed in the May 9 Email to the ASD Program Teacher that I did not want our daughter to continue attending the GSA at the school. I ended the email by stating, regarding our daughter’s participation in the GSA, that “I will be lovingly steering her away from it.” I now realize that my direction to the ASD Program Teacher was not considered explicit enough and not followed. I wrongfully assumed that my direction that our daughter not attend the GSA would be honoured.
51. Again on May 9, the ASD Program Teacher emailed us in response (attached to this Affidavit as **Exhibit “P”**), stating, in part:
- Thank you so much for your very thoughtfully written reply. I know [our daughter] has a very loving family and everything you said supports and proves this completely! I absolutely agree that [our daughter] is attracted to opposite sex individuals and I have no doubt she is not questioning this. I agree with you that her big concern is her hitting puberty and being adverse to having to dress in “girl clothes”.
52. I mistakenly assumed the ASD Program Teacher would work with us, and respect our wish that our daughter not attend the GSA. If the ASD Program Teacher had been forthright regarding her objection to my direction, or her unwillingness to follow it, I could have guided my daughter more effectively.

53. There was no pertinent communication between ourselves and the ASD Program Teacher following the email exchange on May 9, 2016. We assumed that our wishes would be respected, and that if further issues developed we would be apprised. We regret that we trusted the school as much as we did, and that we did not take a more active hand.

#### Summer 2016

54. Once the 2015-2016 school year ended, we noticed that our daughter was much less anxious and depressed. She enjoyed the summer of 2016 and she socialized well with other girls from her church during a young women's summer camp. She described it as one of the best experiences of her life. As a family, we enjoyed many trips and hikes that summer. She appeared much happier than she had been during the previous school year.

#### Events of September to December 2016

55. Our daughter started the 2016-2017 school year "mostly happy" as described in a September 14, 2016 email from the ASD Program Teacher (attached to this Affidavit as "**Exhibit "Q"**").
56. However, unbeknownst to us, our daughter had in fact been pretending, at the behest and suggestion of her peers and teachers, to be a boy at school, and a girl when she came home to us. We were not informed at that time by the school that in September 2016, when she returned, that she recommenced this practice despite having abandoned it during the summer holidays.
57. On September 14, 2016 we finally discovered that our daughter had been self-identifying as a boy, including using a different, male name to refer to herself. We were very troubled by this behaviour, and that the school had again failed to inform us about important and concerning developments regarding our daughter. This behaviour had gone on for four months during the previous school year (from March through to June 2016) without our knowledge.
58. We emailed the ASD Program Teacher on September 15, 2016 (attached to this Affidavit as **Exhibit "R"**) to again express our disapproval of our daughter

attending the school's GSA (which we had concluded was the source of at least some of the issues of the previous school year) without our knowledge or consent.

59. My wife and I discussed with our daughter her behaviour, her feelings, and why she was referring to herself with a male's name. After a full discussion, we and our daughter agreed she would use and be referred to by her own first name or a shortened version of it. Further, our daughter said she would tell her school principal and teachers that she wished to be referred to by her given, female name, or a shortened version of it. I followed up with our daughter on several occasions during the fall of 2016, inquiring whether she was being referred to by her given first name and not the male name. She said she was, and that she corrected all who referred to her as the male name. Unfortunately, our daughter was lying to us.
60. On October 25, 2016, the ASD Program Teacher informed us via email (attached to this Affidavit as **Exhibit "S"**) that our daughter had, that morning, been "very emotional and anxious" and had expressed "dark thoughts and feelings... about herself".
61. In an October 27, 2016 email to the ASD Program Teacher (attached to this Affidavit as **Exhibit "T"**), we again explained, in an attempt to help the ASD Program Teacher to better understand our intellectually-disabled daughter's struggles, that she is a vulnerable girl, and that she had had body image issues in the past. The purpose of this email was to help the ASD Program Teacher understand why it was important to be careful with the influences our daughter was exposed to.
62. On November 7, 2016 we received a concerning email from the ASD Program Teacher (attached to this Affidavit as **Exhibit "U"**) in which she stated, in part:

...[our daughter] shared that she has a voice in her head that talks to her and says very mean things. The voice is called "[REDACTED]", and he often says things like, "You are dead, You are no good. You are better off not existing, You may as well be dead." [our daughter] says she often fights with this voice because it tells her she is worthless and is better off not being alive. Further to this, a different person mentioned to me that [our daughter] was talking to herself in Math Class and was saying, "No [REDACTED], Stop it [REDACTED]", out loud.

63. It was clear to us that our daughter was deeply disturbed and suffering from severe mental health problems. We were doing everything we could to help her, but we were still unaware of the extent to which her extreme gender and identity struggles were contributing to her problems.
64. Our daughter has informed us that, by the fall of 2016, most of the students who initially attended the GSA meetings had stopped attending. At one point, there were only two students, including our daughter, attending the meetings. Our daughter felt pressured by the teachers facilitating the GSA meetings to recruit new members, which, our daughter has informed us, added to the anxiety and stress she was experiencing at the time.
65. Circumstances deteriorated further in December of 2016. In a series of three emails sent on December 6, 7 and 8 (attached to this Affidavit as **Exhibit "V"**), the ASD Program Teacher informed us that our daughter was "becoming more and more depressed", was "having suicidal thoughts", and was possibly "struggling with [REDACTED] the voice in her head, who is telling her to end it."
66. These developments concerned us greatly. In response, we kept our daughter home from school on December 9 and for the rest of December 2016. Her emotional state gradually improved and we began to talk about the things she was experiencing.
67. On December 8 and 9, I spent a number of hours with my daughter so as to discuss the serious problems she was facing. We discussed how serious it was to contemplate suicide. I was very concerned and worried about her. I took time to determine the thoughts, feelings, and circumstances she was experiencing that had lead her to be in such a dark place. We discussed at length her feelings and thoughts regarding gender and her body and how those thoughts and feelings were contributing to her depression and anxiety.
68. We kept our daughter out of school until the week of February 13-17, 2017. During that time, her emotional and psychological state continued to improve. Slowly, over the course of several weeks, she explained to us what had been happening at school: how she had continued to "self-identify" as a boy at the encouragement of staff and peers, how the school had continued to refer to her by male pronouns and

a male first name, how she had been permitted to join the boys team during sex-segregated activities in Phys Ed class and how she had continued to attend the GSA meetings.

69. Once out of school, our daughter stabilized emotionally and psychologically. We patiently loved her and counseled her. She became happier as she re-accepted being a biological girl, that was also a “tomboy”.
70. We felt betrayed by the ASD Program Teacher and our daughter’s school. The ASD Program Teacher and the Educational Assistant claimed to care about our daughter’s well-being, yet they were enabling and encouraging the very behaviours and thought-processes that were contributing to our daughter’s serious depression and anxiety and withholding the existence of those behaviours and thoughts from us, her parents.

#### **Return to School in 2017**

71. Our daughter eventually became well enough to return to school. Naturally, we were uneasy about sending her back to school, but, as our daughter suffers from an intellectual disability, she struggles to learn and requires the specialized resources and learning environment provided by the ASD Program.
72. We contacted to the principal of our daughter’s school in an effort to establish parameters for our daughter that would enable her to attend school, without falling back into the pattern of “self-identifying” as a different sex, anxiety, and depression.
73. We made a verbal agreement with the school that the teachers would refer to her with female pronouns and at least use a shortened form of her female name. The school principal acknowledged our daughter’s unique needs, including her need to have informed support and care from us as her parents. The principal agreed to ensure that he and school staff would keep us informed as to the experiences and challenges our daughter has in school, including questioning her gender.
74. Our daughter resumed attending school in February 2017, but no longer attended the GSA.

**2017-2018 School Year**

75. Thankfully the 2017-2018 school year has been largely uneventful. Our daughter has not been attending the GSA. She has grown and improved over the course of the school year, emotionally, socially, and academically. She has become much more comfortable with the fact that is a girl and looks like a girl. She has slowly begun to dress in a more feminine manner.
76. Unfortunately, and despite our daughter having now embraced her female gender, the aforementioned Educational Assistant has persisted in attempting to secretly influence our daughter. Our daughter informed us that in February 2018 our daughter's Educational Assistant promoted a book to our daughter titled "GEORGE" (a description of which is attached to this Affidavit as **Exhibit "W"**). This book is a fictional story about a "transgender" boy. The Educational Assistant even told our daughter that she could keep the book at school so that we, her parents would not find out.
77. This recent development has reminded us of the dangers of permitting and mandating secrecy in regard to our daughter. It was in the context of an environment of secrecy that our daughter became depressed and suicidal in late 2016. We found out just in time. If the amendments to the *School Act* remain in place, and we are prevented from knowing what is going on in our daughter's life, what happened to our daughter once is even more likely to happen again, and, if it does, we may not find out until it is too late.

**Conclusion**

78. My wife and I carefully supervise our children because we love them. We realize the world is a bad place and that there are people who would harm our children if we do not protect them. We would not entrust our children to the care of a daycare, athletic club, extracurricular activity, or any individual who wanted to create a place or time of secrecy where parents were excluded and precluded from knowing what transpired with their children.
79. We have no doubt, after the events that we have lived through, that it is of the utmost importance for us to be aware of our daughter's experience at school,



including and especially the clubs and activities that she is involved in. We could have lost our daughter permanently when she was scared and confused and depressed, and contemplating taking her own life. We cannot find words to describe such a tragedy. Preventing us as parents from knowing about her activities at school, as now required by the *School Act*, threatens our child's safety and prevents us from being able to counsel and assist her. Keeping us in the dark about our own child threatens her safety and her future, and creates the risk of a tragedy that would be an inestimable loss to us as parents.

80. I swear this Affidavit bona fide in support of the accompanying Application, and for no improper purpose.

SWORN BEFORE ME at [REDACTED], Alberta, )  
this 4 day of April, 2018. )

  
\_\_\_\_\_ )

James Kitchen )  
Barrister and Solicitor )  
A Commissioner for Oaths in and for )  
the Province of Alberta )

[REDACTED]

P.T.