AMENDED THIS JANUARY 30/09 PURSUANT TO
MODIFIÉ CE CONFORMÉMENT À
RULE/LA RÈGLE 26.02 ( )
THE ORDER OF JUSTICE PERELL
L'ORDONNANCE DU
DATED / FAIT LE JANUARY 29, 2009
REGISTRAR GREFFIER
SUPERIOR COURT OF JUSTICE COUR SUPÉRIEURE DE JUSTICE

Court File No.: 08-CV-347100CP

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

LISA CAVANAUGH, ANDREW HALE-BYRNE, RICHARD VAN DUSEN, ~~and~~ MARGARET GRANGER and TIM BLACKLOCK

Plaintiffs

- and -

GRENVILLE CHRISTIAN COLLEGE, THE INCORPORATED SYNOD OF THE DIOCESE OF ONTARIO, CHARLES FARNSWORTH, BETTY FARNSWORTH, J. ALASTAIR HAIG and MARY HAIG

Defendants

A PROCEEDING INSTITUTED PURSUANT TO
THE CLASS PROCEEDINGS ACT,
1992, S.O. 1992, c 6

AMENDED **AMENDED STATEMENT OF CLAIM**

TO THE DEFENDANTS

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiffs. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a Statement of Defence in Form 18A as prescribed in the Rules of Civil Procedure, serve it on the Plaintiffs' lawyer or, where the Plaintiffs does not have a lawyer, serve it on the Plaintiffs, and file it, with proof of service, in this court office, WITHIN TWENTY DAYS after this Statement of Claim is served on you, if you are served in Ontario.

If you are served in another Province or Territory of Canada or in the United States of America, the period for serving and filing your Statement of Defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

AMENDED THIS ~~MARCH 15~~/10 PURSUANT TO
MODIFIÉ CE CONFORMÉMENT À
☐ RULE/LA RÈGLE 26.02 ( )
☒ THE ORDER OF JUSTICE SHARPE
L'ORDONNANCE DU
DATED / FAIT LE OCT. 26/09
REGISTRAR GREFFIER
SUPERIOR COURT OF JUSTICE

Instead of serving and filing a Statement of Defence, you may serve and file a Notice of Intent to Defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your Statement of Defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

Date January 15, 2008 Issued By _____ for Local Registrar

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CLAIM

1. The Plaintiffs representing the Class herein described claim:

(a) A declaration that the Defendants have breached their fiduciary obligations owed to the Plaintiffs arising from their conduct, and that of their servants, agents or employees, in the operation of Grenville Christian College;

(b) Compensation and/or damages for breach of fiduciary duty, negligence, assault, battery and intentional infliction of mental suffering in the amount of $200 million;

(c) Direction for the payment of the moneys payable pursuant to this action to members of the Plaintiff Class on such terms as this Honourable Court deems just;

(d) In the alternative, directing individual assessments of damages;

(e) Punitive, exemplary and/or aggravated damages in the amount of $25 million;

(f) A Mareva injunction as against the defendant Grenville Christian College;

(g) Prejudgment and postjudgment interest pursuant to the *Courts of Justice Act*, R.S.O. 1995, c. C43, as amended;

(h) Their costs of this action on a substantial indemnity basis; and

(i) Such further and other relief as to this Honourable Court may seem just.

PARTIES

2. The Plaintiff, Lisa Cavanaugh (nee Laushway), resides in Kanata, Ontario and attended Grenville Christian College as a day student in 1984-87 and then as a resident student from 1987-1989.

3. The Plaintiff, Andrew Hale-Byrne, resides in Chelsea, London, in the United Kingdom and attended as a resident student at Grenville Christian College from 1988-1990.

4. The Plaintiff, Richard Van Dusen, resides in Toronto, Ontario and attended as a resident student at Grenville Christian College from 1979-1981.

5. The Plaintiff, Margaret Granger, resides in Kemptville, Ontario. Ms. Granger was born in 1970 at which time her parents worked at Grenville Christian College and she was raised at Grenville Christian College where she attended school and eventually became a staff member until 2001.

6. The Plaintiff, Tim Blacklock, resides in Glenburie, Ontario, and attended as a resident student at Grenville Christian College from 1976-1977.

7. The Plaintiffs, Lisa Cavanaugh, Andrew Hale-Byrne, Margaret Granger, ~~and~~ Richard Van Dusen~~,~~ and Tim Blacklock, are the proposed Representative Plaintiffs for the Student Class as defined herein.

8. The Defendant, Grenville Christian College is a non-share corporation incorporated pursuant to the laws of the Province of Ontario on August 29, 1969 having

Ontario Corporation number 226937. It operated at all material times as Grenville Christian College in Brockville, Ontario.

9. The Defendant, The Incorporated Synod of the Diocese of Ontario (hereafter "Diocese of Ontario") is an Anglican Diocese responsible for the training, ordination and supervision of Fathers Farnsworth and Haig and is affiliated with Grenville Christian College.

10. The Defendant, Charles Farnsworth is an ordained Anglican deacon and priest who, together with Father Haig, founded and operated Grenville Christian College from 1969 to 1997. The Plaintiffs state that Father Farnsworth was an Officer and Director of Grenville Christian College during the period 1969 to 1997.

11. The Defendant, J. Alastair Haig is an ordained Anglican deacon and priest who, together with Father Farnsworth, founded and operated Grenville Christian College during the period 1969 to 1983. The Plaintiffs state that Father Haig was an Officer and Director of Grenville Christian College during the period 1969 to 1983.

STUDENT CLASS

12. The Plaintiffs propose that the Plaintiff Classes be defined as follows:

> **The Student Class:** Students who attended and resided at Grenville Christian College between September 1973 and July 1997, except the children and grandchildren of the individual Defendants; and,

HISTORY OF GRENVILLE CHRISTIAN COLLEGE

13. In 1969, J. Alastair Haig and Charles Farnsworth incorporated The Berean Fellowship International of Canada for the purpose of operating a private Christian school in Brockville, Ontario.

14. The school was established in 1969 and was initially known as The Berean Christian School with classes from kindergarten through grade 12, although it later also taught grade 13.

15. In 1973, the school changed its name to Grenville Christian College and operated under that name until it closed in July, 2007. Articles of Amendment were filed on May 5th, 1975 to change the corporate name from The Berean Fellowship International of Canada to Grenville Christian College.

16. J. Alastair Haig was the original headmaster and held that position until he was recalled to the Community of Jesus in 1983.

17. Charles Farnsworth became co-headmaster with Haig in the 1970's and sole headmaster of the school in 1983 and occupied that position until he retired in 1997.

18. On September 29, 1977, J. Alastair Haig and Charles Farnsworth were ordained as Anglican priests by Bishop Henry G. Hill, Bishop of Ontario, who was also the Episcopal visitor of the Community of Jesus. Charles Farnsworth had no prior seminary training or academic degree. J. Alastair Haig had a degree in physical education from the University of Toronto and was previously ordained as a minister in the United Church of Canada. Following their ordination and at all material times thereafter, Father Haig and

Father Farnsworth were licensed by the Bishop of Ontario and/or the Diocese of Ontario to act as Anglican clergy at Grenville Christian College.

19. In 1973, J. Alastair Haig and his wife invited Mother Cay and Mother Judy, two of the principal founders of the Community of Jesus in Massachusetts to visit the school, to meet with staff and to provide advice and direction on the operation of the school, including school discipline and religious instruction for staff and children.

20. The teachings and advice provided by Mother Cay and Mother Judy were relied upon and incorporated into practices of the headmasters and staff at Grenville Christian College throughout the period of 1973-1997.

21. Bishop Hill of the Diocese of Ontario was at all material times aware of the relationship between the Haigs and Farnsworths and the Community of Jesus and was aware that the teachings of Mother Cay and Mother Judy were practiced at Grenville Christian College under the direction of the Haigs and the Farnsworths.

22. Following their ordination as Anglican ministers, Grenville Christian College held itself out as an Anglican private school where children who attended would be taught in the Anglican faith and with Anglican values.

23. Although some of the children who attended Grenville Christian College were day students, i.e., they went home every day to their families, the Plaintiff Class were Students who resided on the school property. The Plaintiffs state that for all intents and purposes, those students who attended and resided at the school as students were wards of the school.

24. The children in the Student Class at Grenville Christian College were in grades 7 to 13, inclusive. Those students ate, slept, worked and attended school at Grenville Christian College. All of those students were required to attend and participate in religious instruction and services at the chapel located on the grounds of Grenville Christian College and in the school itself. Services were performed by, inter alia, Fathers Haig and Farnsworth and, from time to time visiting Anglican clergy.

25. The Plaintiffs state that the Defendants, Fathers Haig and Farnsworth, were the spiritual leaders and advisors of the Plaintiff Class.

26. In addition, the Plaintiffs state that the Defendants, in their capacity as an Anglican private school, Anglican priests and an Anglican Diocese, were required to educate the Plaintiffs in accordance with Anglican faith and values.

BREACH OF FIDUCIARY DUTY

27. The Plaintiffs state that, at all material times, the children who attended the school were entirely within the power and control of the Defendants, and were subject to the unilateral exercise of the Defendants' power or discretion.

28. The Plaintiffs state that by virtue of the relationship between the children and the Defendants, being one of trust, reliance and dependence, by the children, the Defendants owed a fiduciary obligation to the Plaintiffs consistent with the obligations of a parent or guardian to a child under his or her care and control and consistent with the obligations of a priest to a minor parishioner.

29. The Plaintiffs state that the Defendants breached their fiduciary obligations owed to the Plaintiffs; in particular,

(a) The Defendants promoted values which were fundamentally different from those of the Anglican faith;

(b) The Defendants tried to indoctrinate the Students in values which were fundamentally different than the Anglican faith;

(c) The Defendants imposed exorcisms and "light sessions" during which Students were forced to confess sins, real or imagined, as the individual Defendants and other staff members challenged and/or screamed at the Students;

(d) Students were required to watch staff be subjected to the humiliation of light sessions;

(e) Students were compelled to confess imagined sins and to betray other Students;

(f) The Defendants imposed a system of excessive, abusive and inappropriate punishments;

(g) The Defendants imposed punishments on Students without justification;

(h) The Defendants physically intimidated the Plaintiffs;

(i) The Defendants fostered an atmosphere of fear, intimidation, anxiety and suspicion.

(j) The Defendants imposed a system of humiliation and degradation of Students;

(k) The Defendants threatened punishment to Students for any disclosure of the activities of the school to parents and family members;

(l) The Defendants deprived Students of communication with family;

(m) The Defendants engaged in practices which were intended to and did physically, psychologically, emotionally and spiritually damage the Plaintiffs;

(n) The Defendants preferred their own financial interests to those of the physical, emotional and psychological needs of the Students for whom they were responsible.

30. Further, the Plaintiffs state that the conduct of the Defendants as set out in this pleading was part of a systemic campaign by the Defendants, Fathers Haig and Farnsworth and the School, to promote and indoctrinate Students in the teachings and practices of the Community of Jesus.

31. Further, or in the alternative, the Plaintiffs state that the conduct set out in the preceding paragraphs amounts to the intentional infliction of mental suffering on the Plaintiff Class.

DUTY OF CARE

32. The Plaintiffs state that, at all material times, the Defendants owed a duty of care to the Plaintiffs during their attendance at the school.

33. The Plaintiffs state that the Defendants were negligent in the care of the students; in particular, the Plaintiffs state that:

(a) The Defendants failed to have in place systems for the protection of Students from sexual, physical, psychological, emotional or spiritual abuse;

(b) The Defendants failed to provide adequate or appropriate supervision of Students;

(c) The Defendants failed to respond to complaints made by staff and/or Students regarding the mistreatment of Students;

(d) The Defendants failed to have a system by which Student complaints and concerns could be addressed;

(e) The Defendants hired unqualified and incompetent staff;

(f) The Defendants failed to properly supervise and train staff responsible for the care and education of Students attending the school;

(g) The Defendants imposed demeaning and brutal tasks known as "discipline" or, in the case of female students known as "cold grits" for perceived sins;

(h) The Defendants failed to have in place appropriate systems and safeguards for Students who had medical conditions which required accommodation or monitoring;

(i) The Defendants failed to provide appropriate sex education;

(j) The Defendants confronted students and verbally abused Students if they displayed any conduct that was perceived as homosexual in nature;

(k) The Defendant, Diocese, failed to undertake adequate investigation into the background of Fathers Haig and Farnsworth;

(l) The Defendant, Diocese, failed to provide adequate education, training and supervision of Fathers Haig and Farnsworth;

(m) The Defendant, Diocese, failed to ensure that the teachings and practices of the school promoted the Anglican faith and values.

34. The Plaintiffs state that the conduct of the Defendants aforesaid was calculated to produce harm and did, in fact, produce physical, emotional, psychological and spiritual harm to the members of the Student Class and Staff Student Class.

35. The Plaintiffs state that the corporate Defendant, Grenville Christian College, is responsible in law for the conduct of its Officers, Directors, Employees, Servants and Agents more particularly described above.

EXPERIENCE OF REPRESENTATIVE PLAINTIFFS

36. The Plaintiff, Lisa Cavanaugh, attended Grenville Christian College for grades 6 to 10. During her attendance at Grenville Christian College:

i) she was subjected to light sessions, both private and individual, led by Father Farnsworth, Judy James, Judy MacNeil, Margit Mayberry and Sue Farnsworth;

ii) she was called derogatory and sexist names by Father Farnsworth and Judy James;

iii) she was required to watch other students be punished and humiliated in a demeaning fashion;

iv) she was subjected to unnecessary and inappropriate searches of her personal possessions and person;

v) she was not permitted communications with her parents unless supervised or monitored;

vi) similarly, she was not permitted communications with friends unless monitored or restricted;

vii) she was not permitted to have male friends, even of a platonic nature;

viii) she was instructed that her mother was a bad person;

ix) she was required to participate in lectures in which women were demeaned and degraded and unhealthy and inappropriate attitudes toward sex were promoted.

37. The Plaintiff Andrew Hale-Byrne attended Grenville Christian College for grades 11 and 12, during which,

i) he was physically assaulted by Dan Ortolani;

ii) he was ridiculed, punished and provided with no support for his dyslexia by Father Farnsworth and Dan Ortolani;

iii) he was subjected to an exorcism by Father Farnsworth to rid him of the demons that caused his allergies and dyslexia;

iv) he was accused of being demonic by Cheryl Farnsowrth;

v) he was deprived of sleep as a form of punishment by Father Farnsworth, Don Farnsworth, Bill Bayles, Bob Bayles, Dan Ortolani and Dave Poth;

vi) he was subjected to various punishments including,

a) enforced silence for lengthy periods;

b) digging rocks out of the ground with his bare hands until his fingers bled;

c) cutting the lawn with scissors; and,

d) crawling into dumpsters to scrub them out;

vii) he experienced light sessions, both private and individual, led by Father Farnsworth, Betty Farnsworth, Joan Childs, Jim MacNeil, Cheryl Farnsworth and Dan Ortolani;

viii) he was subjected to inappropriate and unnecessary searches of his belongings and person by Dave Poth, Don Farnsworth and Jim MacNeil;

ix) he was ridiculed before other students;

x) his genitalia was visually examined with a flashlight by Gordon Mintz;

xi) he was required, along with other students, to watch programs about Satan and satanic worship;

xii) he was required to attend lectures in which women were demeaned and degraded;

xiii) he was called insulting and demeaning names by Father Farnsworth, Dan Ortolani, Bill Bayles, Dave Poth, Cheryl Farnsworth, Joan Childs, Judy James and Gordon Mintz;

xiv) he was required to witness punishments and humiliations of other students;

xv) he was not permitted communication with his parents by Father Farnsworth, Don Farnsworth, Dave Poth, Jim MacNeil, Dan Ortolani and Gordon Mintz;

xvi) he was similarly prevented from having communication with friends and peers by Father Farnsworth, Don Farnsworth and Dan Ortolani;

xvii) he was forced to participate in lectures and teaching by Father Farnsworth and other staff related to the teachings of the Community of Jesus, including tapes by Mothers Cay and Judy.

38. The Plaintiff Richard Van Dusen, attended Grenville Christian College for grade 12 during which time,

i) he was beaten with a wooden paddle by Dan Ortolani and Mr. Phelan;

ii) he was subjected to the punishment of enforced silence for lengthy periods of time;

iii) he experienced light sessions led by Father Farnsworth;

iv) he was required to witness the punishments and humiliation of other students; and,

v) he was subjected to regular monitoring and surveillance thereby resulting in a complete lack of privacy and restricted communication with peers and family.

39. The Plaintiff, Timothy Blacklock, attended Grenville Christian College for grade 9, during which time:

i) he was beaten with a wooden paddle by Father Farnsworth and Bob Phelan;

ii) he was subjected to other punishments which were inappropriate and excessive in duration;

iii) he was subjected to light sessions, both private and individual, conducted by Father Farnsworth;

iv) he was made to witness punishments and humiliations of other students;

v) his communication with his family was restricted and monitored.

40. The Plaintiff, Margaret Granger was a student at Grenville Christian College from 1974-1989, during which,

i) she experienced light sessions, both private and individual led by Al and Mary Haig, Charles and Betty Farnsworth, Joan Childs, Judy James, Jim and Judy MacNeil, Susan Steinbach, Dan Ortolani and Don Farnsworth;

ii) she was subjected to various punishments imposed by Father Farnsworth, Joan Childs and Judy James including, but not limited to:

a. she was required to work from dawn until dusk;

b. she was put on periods of prolonged and enforced silence;

c. she was made to clean out dumpsters;

d. she was made to scrub out industrial ovens;

e. she was required to scrub the kitchen floor with a toothbrush and to scrape the floor clean with a knife;

f. she was required to clean out the grease trap under the floor with her hands;

g. she was sent to the Community of Jesus;

iii) she was required to witness the punishment and humiliation of other students;

iv) she was required to attend and participate in lectures in which women were demeaned and degraded;

v) she was required by Father Farnsworth to watch frightening and inappropriate videos about satanic worship;

vi) she was required by Father Farnsworth to visit the boiler room to see the flames of Hell;

vii) she was repeatedly intimidated and bullied by Father Farnsworth and other staff;

viii) her communications with friends and other students were restricted and monitored;

ix) she was taught by Fathers Haig and Farnsworth and other staff that her parents were sinners, as was she;

x) she was prevented from showing her parents love and affection.

41. The Plaintiffs state that each of the Representative Plaintiffs lived in fear and anxiety during their attendance at the Grenville Christian College as a consequence of the conduct of the named Defendants and staff, for whom the Defendants are in law responsible.

42. Further, the Plaintiffs state that the Defendant, Diocese of Ontario, was aware or should have been aware of the conduct of the individual Defendants and the staff at Grenville Christian College, but took no steps to report the abuse to the appropriate authorities or parents. The Plaintiffs state that the Defendants' failure to investigate or report its knowledge of the conduct at the school constitutes negligence and/or breach of fiduciary duty.

DAMAGES

43. The Plaintiffs state that the Defendants knew, or ought to have known, that as a consequence of their mistreatment of the children who attended Grenville Christian College, those students would suffer significant sexual, physical, emotional, psychological and spiritual harm which would adversely affect their relationships with their families and others.

44. Members of the Student Class and the Staff Student Class were sexually, physically, mentally, emotionally and spiritually traumatized by their experiences arising from their attendance at Grenville Christian College. In general, and without restricting the generality of the foregoing, the Plaintiffs suffered,

(a) A loss of self esteem and confidence and feelings of humiliation and degradation;

(b) An inability to complete or pursue their education;

(c) Impaired ability to obtain and sustain employment, resulting in lost or reduced income and ongoing loss of income;

(d) Reduced earning capacity;

(e) An impaired ability to deal with persons in authority;

(f) An impaired ability to trust other people or to sustain intimate relations;

(g) Fear and intimidation;

(h) Deprivation of the love and guidance of their parents, siblings and other family members;

(i) A sense of isolation and separateness;

(j) An impaired ability to express emotions in a normal and healthy manner;

(k) An impaired ability to control anger and rage;

(l) Psychological disorders, including eating disorders, depression and anxiety leading in some cases to attempted suicide or suicidal tendencies;

(m) Post traumatic stress disorder;

(n) A requirement for medical and psychological treatment and counselling;

(o) An increased need for medical and psychological treatment and counselling;

(p) An impaired ability to enjoy and participate in recreational, social and athletic and employment activities;

(q) Loss of friendship, companionship and support of friends and community;

(r) Physical pain and suffering;

(s) Sexual disorientation as a child and an adult;

(t) Sexual trauma for those who were sexually abused;

(u) An inability to undergo normal and healthy peer development and sexual development;

(v) Damage to their faith; and

(w) Loss of enjoyment of life.

45. The Plaintiffs state that the damages suffered by the Plaintiffs were an entirely foreseeable consequence of the conduct of the Defendants aforesaid.

46. The Plaintiffs plead that the Defendants' conduct and actions in the circumstances have caused them to develop certain psychological mechanisms in order to survive the abuse. The mechanisms include denial, repression, disassociation and guilt.

47. The Defendants' conduct prevented the Plaintiffs from discovering the wrongfulness of their actions, the nature of their injuries and/or the nexus between their injuries and the abuse. The Plaintiffs have blamed themselves for the abuse.

48. The Plaintiffs have received little or no meaningful therapy regarding the abuse. They are still in the process of coming to understand and appreciate the full extent of the injuries caused to them by the abuse and the nexus between the abuse and the injuries caused by the abuse. The Plaintiffs require therapy and medical attention.

49. The Plaintiffs plead that, as victims of abuse, they are only now discovering the necessary connection between their injuries and the wrong done to them by the Defendants.

50. The Plaintiffs were incapable of commencing the proceeding before now because of their physical, mental or psychological condition.

51. The Plaintiffs plead that at the time of the assaults, negligence and breaches of duties, the Defendants had charge of the Plaintiffs, were in positions of trust or authority in relation to the Plaintiffs and were persons on whom the Plaintiffs were dependent.

52. The Plaintiffs plead and rely on the provisions of the *Limitations Act*.

53. The Plaintiffs plead and rely on Rule 17.02 of the *Rules of Civil Procedure*.

54. The Plaintiffs respectfully request that this action be tried at Toronto, Ontario.

DATE:

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