

SUPERIOR COURT OF JUSTICE

5 B E T W E E N:

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

10 Plaintiffs

- and -

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

20 Defendants

T R I A L P R O C E E D I N G S

25 BEFORE THE HONOURABLE JUSTICE J. LEIPER
on September 24, 25, 2019, at TORONTO, Ontario

APPEARANCES:

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T A B L E O F C O N T E N T S

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M. Granger - in-Ch.
(Ms. Lombardi)

TUESDAY, SEPTEMBER 24, 2019

U P O N R E S U M I N G:

MARGARET GRANGER: PREVIOUSLY SWORN

5 EXAMINATION IN-CHIEF BY MS. LOMBARDI: Cont'd

Q. So, yesterday we left off with you telling us a little bit about being a prefect and what some of your duties were. Earlier on in the day you took us through some examples of rules at Grenville, some disciplines, light session examples.
10 Were there any other practices at GCC that stand out in your memory?

A. You mean like disciplines?

Q. Disciplines or -- or other practices...

A. Okay.

15 Q. ...that just stand out in your mind?

A. Yes, there were -- so aside from being on "D" which was something we all feared and tried to avoid for obvious reasons, there were some other disciplines that happened to me and others. They were common place and you -- and they were --
20 they were very shameful. One was in early grade 13 I was forced to have my hair cut short. I was told basically long hair was of the world and that I -- it was part of the way you could provoke less demand if you had long hair, so I had to have it cut short and permed and I felt like an old lady. Very -- I
25 felt so humiliated and this was something that having done two girls throughout my time at Grenville. I was not -- I was not shocked by it, because I was -- I had seen it done, but I was mortified. I'd always wanted to have long hair.

Q. And when you say other girls at Grenville, do
30 you mean other staff girls at Grenville?

A. No, I mean students. In fact, my -- my hair dresser that I started at -- with at Majestic Hair Styl-on --

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Hair Styling Salon, I sought -- I went to her from grade 4 till after my marriage when I was 33. And when I was an older adult she told me she moved salons because she couldn't bear to witness these girls being brought into to the salon to have their hair cut short against their will.

Q. Thank you.

A. Another example of discipline that was done to me and others, we were -- if we were to -- found to be too vain and worried about our weight and too slim, we were often force fed, or put on diets if we were -- seemed to by glutinous for the sin of gluttony, or the sin of vanity. You couldn't win. And I personally was -- I endured both of those, and that was not only for staff kids.

Q. And can you describe what those -- what those things were like? How were you force fed?

A. Well, the -- your table hand, you sat -- you were -- you were assigned to a table head who, like I was moved tables to a very strict table head who was told, make her eat. And I remember being at the child's table for example and they would fill my plate with Eggo waffles and I was determined not to eat them, so I felt horrible when I finally succumbed to the direct -- their directions. And then I became bulimic after that.

Q. And -- and what's an example of being put on a diet?

A. Well, as I mentioned earlier -- I don't know if I mentioned this last year, but -- I mean yesterday, sorry. It seems like a year ago. We were -- any sin that could be labelled against you would be and if you were somebody who was pudgy -- I was pudgy by the age of 5, so I put on my first diet then. And the -- even into when I was bulimic they put me on the 3D diet. Back -- by the time I was 17 I was binging like

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crazy.

5 Q. And so let's talk about, you said your --
your bulimia then. So, how was your bulimia treated side from
these -- I guess these diets and being force fed? Were -- did
you receive any other treatment or care while you were at
Grenville to deal with your bulimia?

10 A. The only thing I remember is when I was 14 I
-- I was severally anorexic and I had a check-up with Dr. Best
after I'd lost my period for a year, and she just advised me to
start eating more. Other than that everything that I received
as treatments was in the form of a light session accusing me of
sin, whether it be gluttony, or vanity.

15 Q. Thank you. Moving onto some of the teachings
that you have received at Grenville as a student, what teachings
did you receive with regard to sexuality?

A. Oh, that's a lot.

MR. BOGHOSIAN: I didn't hear that word, the last
word in the question.

MS. LOMBARDI: Your question?

20 THE COURT: I think the answer was that's a lot.
Oh, the last part of the question?

MS. LOMBARDI: The question was, sorry, what were
the -- what teachings did you receive about
sexuality...

25 MR. BOGHOSIAN: Thank you. That's the word...

MS. LOMBARDI: ...at Grenville?

MR. BOGHOSIAN: ...I had missed.

30 MARGARET GRANGER: Okay. If I can explain it
from the perspective of a teenager. I was taught
that sex was a sin. That to be -- to have
sexuality was a sin. That we were to remain
abstinent until marriage. And anything about our

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bodies was to be -- were to be ashamed of our bodies, because they were -- if they were sexy in any way we were to be covering up and doing anything we could to not provoke lust in a boy.

5

So, for example, we've talked about the -- the dress codes, but there were unwritten rules that weren't in the -- the handbook. Where you would be subjected to -- what's the word? Inspections, well especially when we weren't in uniform, we would have to bend over and touch our toes to ensure that you couldn't see cleavage, you know on our way to -- out the door on our weekend, especially prom dresses. The girls had to have their dresses approved and to bend over, make sure there was nothing -- no way to see cleavage, even when you're touching your toes. I even had to -- I had a -- a sew -- a sewing machine, so I had to alter many dresses for girls, adding in material on the bodices, or material over the shoulders.

10

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Girls were shamed for the way they walked. One of my best friends when we were in light session she would be pointed out for her seductive walk. So, you -- you were just made to feel ashamed of your body, ashamed of sex.

25

And it got worse, because we were given the explicit teaching from Father Farnsworth in the blue lounge dormitory, where at least once, maybe twice a year he would gather all the girls in the

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5 dorm and preach about sexuality. And the message
was clear it was that you were to remain
abstinent until marriage. And further, you had
to do everything you could to protect yourself
from inciting a man's lust. And that we were
just like Eve in the Bible who committed the
original sin, so we had to make sure that we
didn't follow into align with her example and
tempt men with our lustful demon flesh. And he
10 would give all these examples from the Bible
about Jezebels and Beth Sheba, and -- and
basically call girls whores and temptresses. And
he would -- he'd just go on and on, so you felt
extremely ashamed about even having a female
15 body. He even said that if girls were sexually
assaulted or raped, or harassed it was their
fault.

20 And I remember being in the -- those meetings
where he would try to get girls to confess if
they had been sexual active, and they were
required to come to confess after the meeting to
have private confess sessions with him. And they
would obviously -- I don't think many people
25 would volunteer for that, but they -- it seemed
to me they -- they would pull people back
afterwards. People especially who had been
crying because they were long drawn out sessions,
after the meeting was over. I experienced some
30 of these sessions myself, not at those little
lounge meetings, but Farnsworth and Judy James
were very interested in confessions about your

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sexual thoughts. It was like they were -- they were so preoccupied by knowing what you thought about, anything, what you knew. I even had spent a light session when I was young -- younger. Didn't know what masturbation was and they were trying to get out of me what I knew, what I had done, what I fantasized about. You're left feeling dirtier and more ashamed than you can imagine.

5
10 MS. LOMBARDI: Q. So, you -- you mentioned that one of these sessions occurred in the blue lounge. Where is the blue lounge exactly?

A. It was on the second floor of, like the end of the hallway in the girl's dorm.

15 Q. And so who all was in attendance?

A. Oh, it would be all the girls who resided in the dorm and we would be required to change into our pajamas and bathrobes, and go to the girls -- go to the lounge. And every single one of these was -- we were always wearing our pajamas. And Father Farnsworth would come in once we were all seated and preach.

20 Q. And so in your pajamas, what time of -- of day would this be?

A. It was after Compline service around 9:45 at night.

25 Q. And how long would -- would this session go on?

A. It would vary, but at least -- it seemed to me at least an hour.

30 Q. How did you feel in the session?

A. Well, you just felt so dirty about yourself, and so afraid about sex and just ashamed.

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Q. And to your observation when you were in these sessions, how did the other girls in these sessions react?

A. Well, you'd see people crying, or people looking scared, just sort of hunching into themselves.

5 Q. Were there any lectures or talks other than these sessions in the girl's dormitory regarding sexual education, anything more formal?

A. We were never taught about the mechanics of sex. That was not in the curriculum for our school, but I
10 should add, there -- in -- when I was 17 Aids becoming a scare, if you will.

Q. Mm-hmm.

A. It was becoming prominent in the news and Father Farnsworth decided to add that to his spiel, if you will.
15 And one of the -- the blue lounge meetings that I recall he preached about the fact that if you weren't -- if you -- you weren't -- if you didn't have practiced chastity and monogamy then you could get Aids. And he got so fired up about that that we had to chant "Chastity, monogamy, or Aids" at the top of our
20 lungs at the end of the -- the -- the session. It was bizarre.

Q. So, there was nothing taught, or was there anything taught with respect to homosexuality?

A. Oh, it was one of the most evil sins. I should add that he also liked to talk about virginity and the
25 fact that if you had every had sex that you were supposed to come to confess and you could be sanctified through his -- through confessing to him and receive your secondary virginity, which would mean that you could go on in life as a pure young woman until you were married.

30 Q. Thank you. Did Grenville ever entertain guests at the school?

A. Yes. We had dignitaries that Grenville very

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5 much relied upon for the -- for the publicity and for the reputation. So, any time someone like -- well we had -- on the Board of Advisers we had quite a few prominent members and if they ever came to Grenville we rolled out the red carpet and put on a show, including the choir singing for them, and fancy banquets and that kind of thing.

Q. And so when you would roll this carpet out and put on these shows, what would happen to the class time?

10 A. Well, generally they would come for -- in our weekend, or evening, so it wouldn't necessarily disrupt class. I remember the Lieutenant Govern, Pauline McGiven I think her name was, she came during a class at -- during school day and we all lined the driveway with flags and waved them as she drove in the -- in the front -- the front gates. So, that was during class, but generally it wasn't disrupting.

15 Q. Did any of these visitors attend the school wide assemblies that you described to us yesterday?

A. Absolutely not.

20 Q. Did any of these dignitaries or visitors attend or participate in light sessions?

A. No.

Q. To the best of your recollection did any of these dignitaries or visitors ever see one of the students that was on discipline doing one of their discipline work tasks?

25 A. No, they would have been kept well out of sight.

Q. So, thinking back to your time, now at the Community of Jesus in Massachusetts, how would you describe the overall atmosphere there?

30 A. For me it was an atmosphere of intimidation and fear, and being under surveillance. Whether it be the people that were immediately in your home that you were staying,

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or as you walked down the street, or as you were in church. It was -- I always felt terrified there.

Q. And how did you feel at Grenville with respect to that atmosphere at Grenville?

5 A. It was the same atmosphere. I would add though that it was worse during the -- for me, because I was a staff kid, it was worse during summers and the breaks, because that's when we would have the direct teachings from the Community of Jesus and also we had nonstop light sessions. But
10 when the students came, for me it was kind of a dilution of the light sessions, so now they would be the targets for a little while and I could kind of hide a little bit between my light sessions.

Q. Did any of the practices that we discussed, the light sessions, the forms of discipline, the assemblies, did
15 any of these change when Charles Farnsworth retired in or about 1997?

A. It seemed to me that almost everything changed. I don't have -- and -- and at that time I was starting
20 to consider leaving, so I had my head full of what I, you know how to survive that transition. But I know for sure that all kinds of rules changed from the clothing. That kids were finally allowed to wear jeans. They were allowed to wear pants to church. Girls were allowed to wear pants to church. They
25 could start sleeping in on Saturday mornings and Sunday mornings until church. A lot of the restrictive kind of practices and disciplines seemed to be letting up, because once Farnsworth retired -- I know for a fact they were really worried about enrollment and they wanted to figure out how to make the -- the
30 school continue to be marketable.

Q. So, what kinds of changes did you notice from 1998 when you moved off campus, but were still working...

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A. Mm-hmm.

Q. ...at the school to 2001 when you finally walked away for good?

5 A. Well, like I said, those of kinds of rules were being completely changed and in fact I have friends who were students during those years and they don't understand the pain and the suffering that students went through prior to them, because it was a really different kind of atmosphere after '97.

10 Q. And what can you tell us about how quickly, or how these changes started to come about and started to be implemented in that period, host Charles Farnsworth retirement?

15 A. I don't recall the specifics. See I know that the -- the "A" Team was meeting and trying to hash out what rules they were going to remove and what rules they would keep or change. And they also met with the staff. I remember Dawn Farnsworth was the leader of one of the -- the meetings around 1997, right when Farnsworth was retiring. When his father was retiring, he and Judy James -- actually I'm not sure if Judy was the leader of that meeting. I for sure remember Dawn Farnsworth and a couple others. And they addressed the staff in a staff meeting and this was the first time we had a meeting of this nature where they said "We're aware that some people who have grievances from the past and some people have had hurts, and we think this is the time to err those grievances and work through them." And I remember being rather taken aback at that meeting, because this was something new. I'd never been allowed to think about my grievances and I was so brainwashed by them that I didn't really even connect to them. I didn't even understand what kind of abuse had gone on.

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25
30 Q. And so how long did it take you to come to that realization?

A. Oh it came very gradually. The only thing I

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knew when I asked permission to move away from living on campus,
but still work there, the only thing I had to go on from my
heart was that I was unhappy. I didn't understand that
Grenville was abusive to me, or anyone else. I just knew I was
5 unhappy. And so deeply unhappy that I couldn't stay there. And
then when I did finally walk away, I still wanted to maintain
ties with Grenville, because it was the only place I knew. I
had no friends in the outside world. And then even by 2007 when
I was actually a teacher by then, I was married, I had kids, I
10 had the life of my dreams, but I was having so many
psychological issues that I was getting -- starting to realize,
just coming to some understanding in 2006 and '07 that Grenville
had been damaging. So, it was really gradual.

Q. And you said psychological issues, what kinds
15 of psychological issues were you suffering?

A. Well, it start -- I couldn't get my eating
disorder under control. That was the main flag if you will, but
then when I sought help I had to -- it was really hard to find a
good psychologist and psychiatrist. When I finally did find a
20 good fit in 2007 I was diagnoses with PTSD, and I've been
getting regular therapy from both a psychologist and
psychiatrist that were sent.

Q. Okay. As a staff member at Grenville looking
back, how do you feel about your role in your relationship to
25 the students?

A. Well, I -- I worry that I caused harm and
that me following the regime and sort of instituting the -- the
practices that we did, like the dorm searches and the -- and
helping girls through their disciplines, I -- that haunts me and
30 I feel guilty.

Q. And as a student, a former student of
Grenville looking back, how do you feel about the experience you

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received at Grenville?

5 A. As a student? Well, it was just so abusive. Now, that I can look back from -- with my eyes open I can see how we were so shamed and humiliated and targeted for our nature
10 selves. For just being who we were. We were not allowed to be who we were. It was so damaging. So, I just feel terrible for not just what I went through, but I never noticed what other people were going through. People suffered in isolation. They sometimes got stood up in front of everyone and that was obvious
15 to everyone, because you could see them being shamed and humiliated, but most of the time when you got your worst targeting was behind closed doors, just with the deans, or with Father Farnsworth. And then you were given disciplines and you really -- you weren't allowed to talk to people and it just --
it just shattered me and it -- and I know it did to other people.

MS. LOMBARDI: Thank you very much, Beth. Those are all my questions for this witness at this time.

20 THE COURT: Mr. Boghosian.

CROSS-EXAMINATION BY MR. BOGHOSIAN:

25 Q. Ms. Granger, I understand you've been a school teacher for the past 17 years?

A. Yes.

Q. And you're married to a Gary Granger?

A. Yes.

Q. He I understand is a police officer?

A. Yes.

30 Q. You're happily married?

A. Yes.

Q. You have two children?

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A. Yes.

Q. Who are doing well and well adjusted?

A. For the most part.

5 Q. And in fact you and your husband were married
in the chapel at Grenville Christian College in 2003; is that
correct?

10 A. Yes, we were. I choose to go back. I had
left, as I said in 2001 and so as I said earlier, it was
important to me to try to maintain ties with the only people
that I knew. I actually had in my wedding party two of my staff
kid friends as my maid of honour and bride's maid.

Q. Ms. Granger what you have done to prepare
yourself for testifying today in terms of reviewing, reading?

15 A. I went through all my testimonies from 2008,
'11 and '15. And I've done an extensive amount of therapy...

Q. You...

A. ...and writing down flashbacks, because as
you can understand, I've been actively repressing memories ever
since I left Grenville.

20 Q. But you began recovering them you say in 2006
or 2007?

A. I began, but when you're teaching full-time
and you have children, you don't have time to unpack this kind
of trauma.

25 Q. Okay. And did you review your affidavit that
you swore in 2010?

A. Yes.

Q. All right. And I take it you reviewed
evidence given by others, like Lisa Cavanaugh?

30 A. I -- I don't know what you mean.

Q. You don't -- you don't recall -- you've not
conferred with people like Ms. Cavanaugh about your evidence and

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the evidence she's giving?

A. We -- we've spoken about our experiences to each other.

5 Q. For example, you've never, in all of the material where you've given sworn evidence, the 2008 cross-examination, the 2010 affidavit, the 2011 cross-examination and the examination for discovery in 2015, you've never in any one of those sessions ever mentioned repeating chastity, monogamy, Aids, that you were ever required
10 to chant that; right? That appears nowhere in any of the evidence; correct?

A. I -- I don't remember.

15 Q. You don't remember? You don't remember the fact that you were invited to talk about all of the issues you had with the teachings of sexuality at the school, and you never mentioned that?

A. I read through 2,213 questions that I was asked and I read through all my answers. It's a lot to remember.

20 Q. Okay.

A. And as I said -- well, I haven't said this, I've been off work this year for a few months, because of mental and -- illness and issues, and I've had time to reflect about what happened at Grenville, more so than I have ever since 2007.

25 Q. But you're aware that Ms. Cavanaugh gave that evidence about chanting chastity, monogamy, Aids?

A. I'm not aware of that.

Q. Oh, you're not aware of that? You just happen to gain a recollection of this since your 2015...

30 A. Yes.

Q. ...examination for discovery?

A. Yes.

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Q. And did you ever notify your counsel, I remembered this please tell the other side?

A. Actually when I spoke with my counsel when we were preparing for this I brought this up.

5 Q. Anything else that you did prepare for today other than read the material you just told us about?

A. I -- I did a lot. I -- over the last few months I've been, as I said I've been journaling whatever flashbacks came to me. I have been trying to refresh my memory and actually trying to think about how life was back in the
10 Community of Jesus and Grenville. I have listened to some of the tapes that I had to listen to as a -- as a child and as an adolescent, and a young adult recordings of the mothers preaching. We had to -- as I mentioned yesterday, I had to
15 listen to those repeatedly while I was at the Community of Jesus especially. And I wanted to kind of refresh my memory, because I didn't understand those were abusive until now, when I've been listening to their messaging.

Q. Okay. So, you listened to tapes and -- and I
20 want to show you a couple of documents. So, the first one is a -- is -- is this a posting that you made of a photograph with a caption on the Grenville Christian College Facebook page?

A. Yes.

Q. And these are four cassette tapes of lectures
25 by Mothers Kay and Judy?

A. Yes.

Q. And your mother had them in her capacity. Your parents had them in your capacity -- their capacity as members of the Grenville community?

A. My parents were members -- members of the
30 Community of Jesus and they were teachers at the -- at Grenville Christian College.

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Q. And you were also a member of the Community of Jesus?

A. Yes, I was.

5 Q. And you were required to listen to these as a member of the Community of Jesus?

A. Yes.

Q. And these weren't tapes that non-staff kids were required to listen to?

10 A. The -- the mother -- mothers cam duty did conduct retreats for the students, the boarding students several times in the eighties. At least -- at least a couple of times and they also came Mother Buddy Betty Bugsley came in early nineties with a group from the Community of Jesus to Grenville and lead a week long retreat for the students, the boarding
15 students.

Q. Okay. In any event, Ms. Granger you listened to cassette tapes of the teachings of Mothers Kay and Judy from the Community of Jesus; correct?

A. When? I mean I listened to them...

20 Q. In preparation for today?

A. Oh, yes I did.

Q. And I'm suggesting that you've conflated what you've heard on those tapes very recently with what you think you were taught at Grenville Community?

25 A. Can you define conflated?

Q. You're confusing -- you're confusing what you heard at the Community of Jesus and what you were reminded of about those teachings at the Community of Jesus by these tapes with what you heard from, for example Father -- Father
30 Farnsworth at Grenville?

A. I was in no way confusing them. I was reminding myself and refreshing my memory, because as you -- if

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5 you learnt -- if you heard these tapes you would certainly
repress what you of course listen to from a young age. And it
was not confusing, no. It reminded me and confirmed the
connection between the Community and Jesus and Farnsworth
teaching. This one's called "Be needed, be wrong, be alive."

Q. In any event, you listened to tapes that were
of lectures given by Mothers Kay and Judy of the Community of
Jesus?

10 A. I did listen to some of them. And my parents
had about seven. I listened to a couple of those. And previous
to my mother finding these I actually had access to MP3 copies
of about 20 others.

15 Q. All right. And that's what's informed your
testimony today about the teachings at Grenville, what you heard
on these tapes of Mothers Kay and Judy?

A. No, that's -- that's not informed my
testimony, it just confirms my -- my understanding that what --
what Farnsworth preached to us was an extension and a mirror of
what we heard through the teachings of Mothers.

20 Q. Okay. Ms. Granger, I'm suggesting to you
that you feel a tremendous obligation as a representative
plaintiff and a member of the steering committee of this class
action, to help as much as you can through your evidence the
class to receive compensation in this lawsuit; isn't that true?

25 A. I do feel pressure to bring this story
forward, because there are many students who are still unable to
speak for themselves, to even deal with the kind of trauma that
they had. My brother for example is one of them. It took him
12 years to write down even part of his testimony. He did so
30 this summer. And as far as compensation goes, I can for one say
that having money for therapy is extremely important to me and
to many.

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5 Q. All right. You've come to feel extreme bitterness, even hatred toward Grenville for not only what you went through as a staff kid and member of the Grenville Community, but for the impact it had on your parents; isn't that fair?

A. Can you repeat the question?

10 Q. I'm suggesting that you've come to feel extreme bitterness, even hatred toward Grenville for not only your treatment as a member of the Grenville Community, but the treatment of your parents, particularly your mother?

A. I don't think I feel hatred towards Grenville, but I do feel very strongly that there was a lot of abuse and that abuse has been -- actively trying to cover it up and that is what bothers me and makes me angry.

15 Q. And your parents live in a trailer now?

A. My parents live in a home that my -- my husband and I have bought and paid for and they pay us for monthly rent.

20 Q. For a long time after Grenville closed they were living in a trailer; right?

A. Yes.

Q. And they -- they're really poorly off...

A. Yes.

25 Q. ...financially aren't they? And you resent Grenville for putting that in -- them in that predicament. They lived there and worked there hard for so many years, only to have the school close and they find themselves penniless and having to rely on their daughter to look after them.

A. I do resent that.

30 THE COURT: And Mr. Boghosian do you plan to make the document an exhibit? Did you want...

MR. BOGHOSIAN: I don't think so, Your Honour.

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(Mr. Boghosian)

THE COURT: ...you don't think so?

MR. BOGHOSIAN: Unless your -- you've got by
your...

5

THE COURT: Just have a look at -- well perhaps
since you did put it to the witness that perhaps
none of the evidence might come from reminders of
this...

MR. BOGHOSIAN: Okay.

THE COURT: ...and there's some description...

10

MR. BOGHOSIAN: Sure, if we can -- maybe we can
make them A and B. The next exhibit A and B.

THE COURT: Any reason not to just make it a
numbered exhibit, since it's just -- I mean we
did that yesterday with...

15

MR. BOGHOSIAN: Sure.

THE COURT: ...other exhibits. It'll be clear on
the record. It's because you showed it to Ms.
Granger for her to comment on. Does that make
sense?

20

MR. BOGHOSIAN: Yeah, I meant A and B of a
numbered exhibit, but it doesn't really matter.

THE COURT: Oh, are there two?

MR. BOGHOSIAN: Oh, there are two.

THE COURT: Oh, I only have one.

25

MR. BOGHOSIAN: Did you not get two?

THE COURT: I have one. Do you have a second
copy for me and for the Registrar par chance?
Oh, I see.

MS. LOMBARDI: We have a copy -- we have a copy.

30

THE COURT: All right. Right the second one is
going to "Be needy, be wrong, be alive" and the
first one is "I repent anew." All right. We'll

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5 get -- I think it make sense to mark these as the next two. We'll just continue with the numbered exhibits since we don't have any letters. So, that'll be Exhibit 18 and Exhibit 19, so maybe this one "Be needy, be wrong" will be exhibit 18 and then the next one will be Exhibit 19.

CLERK REGISTRAR: Yeah.

THE COURT: Thank you.

10 EXHIBIT NUMBER 18: Document titled "Be needy, be wrong, be alive" - produced and marked

EXHIBIT NUMBER 19: Document titled "I repent anew" - produced and marked

15 MR. BOGHOSIAN: Q. Now, you sat here -- you sat here throughout the first -- the entire first week of the trial?

A. Yes, sir.

20 Q. You were in attendance listening to all the evidence?

A. Yes.

Q. You were here yesterday listening to the evidence?

A. Yes.

25 Q. And I'm suggesting that you've supplied new evidence that you've never given before to attempt to corroborate the evidence given by others so far at this trial and to support the theories of Dr. Barnes with respect to psychological abuse; isn't that fair?

30 A. No. I have given as much evidence as I could today, because I was allowed to answer certain questions that were open ended.

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Q. Okay.

A. And as I said, I have actively tried to uncover memories in the last six months, writing down pages and pages and pages of memories as they come, and believe me that is not easy to do.

Q. Okay. And for example, upon hearing my cross-examination of Dr. Barnes about students being able to speak their native languages, you were quick to get up on the stand to claim that two French Canadian friends of yours had been discouraged from speaking in French to each other; right?

A. Yes, she -- she -- that -- just listening to her confirmed that I needed to -- to clarify that, because I had not remember to speak that in -- I had never been asked that question earlier.

Q. And these are close friends of yours?

A. Yes, one of them was here yesterday.

Q. And...

A. The other one committed suicide.

Q. So, these were -- these were close friend of yours that were prevented from speaking French to each at school you claim?

A. Yes.

Q. You were -- you were cross-examined in 2011, Ms. Granger on a two -- you were cross-examined...

THE COURT: Counsel just..

MR. BOGHOSIAN: I'm sorry I wasn't.

THE COURT: That's all right. Ms. Granger, if you need a moment, I've -- I've noticed that some of your evidence you have teared up and been able to speak, but if you need a moment we can take a short break.

MARGARET GRANGER: I really want to get this over

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with, so...

THE COURT: You want to keep going?

MARGARET GRANGER: I'll keep going.

THE COURT: All right.

5

MARGARET GRANGER: Thank you.

THE COURT: Sorry, Mr. Boghosian this is a transcript of a cross-examination on an affidavit from June of 2011 that you've produced?

MR. BOGHOSIAN: I beg -- I beg your pardon?

10

THE COURT: This is a transcript from a cross-examination...

MR. BOGHOSIAN: Yeah.

THE COURT: ...on an affidavit from 2011?

15

MR. BOGHOSIAN: From 2010. The affidavit was sworn on 2010.

THE COURT: Right, but it looks like the cross took...

MR. BOGHOSIAN: In 2011.

THE COURT: ...in June of 2011; okay.

20

MR. BOGHOSIAN: Q. Is this something that you personally observed, these two ladies not being allowed to speak French, or is this something that you were told?

A. We -- I observed this. It was common place.

Q. Common.

25

A. And Debbie Valentine, as I said, and Kim Gallant were from Quebec, and they were not allowed to speak to each other.

30

Q. Yeah. And you testified in-chief yesterday that you resided in the student dorms in grades 9 and 10 and on and off for grades 12 and 13. Do you recall...

A. Yes.

Q. ...giving that evidence?

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A. Yes.

Q. Okay. If I can take you to paragraph 8 of the affidavit I just put in front of you. Was this an affidavit that you swore on or about September 25, 2010?

5

A. Yes.

Q. Yes?

A. Yes.

10

Q. And in swearing it you knew that you were firming or swearing as to the truth of the contents of the document?

A. Yes.

15

Q. All right. And if I can refer you to paragraph 8. You wrote -- you affirmed "When I was in high school I lived in the girls dormitory in the school on and off for perhaps two years. There were times in that two year period where I was sent to live with other staff family on campus." That's what you swore in your affidavit in 2010?

A. Apparently so.

20

Q. Yeah. And that's when your memory of events would have been refresher than it is today; fair?

A. No. I mean, that I -- I -- I don't agree with that now that I've taken more time to reflect on what -- what I -- what I experienced there. So, I must have made a mistake then.

25

Q. I'm suggesting, Ms. Granger that you're giving evidence -- you're -- you're attempting to put yourself in the dorm for a far longer period than -- than was in fact the case to give yourself cred with respect to your evidence about what the students went through in the dormitory atmosphere?

30

THE COURT: You mean credibility by cred?

MR. BOGHOSIAN: What? Cred, yes credibility.

THE COURT: You used the word "cred" assuming

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credibility.

MR. BOGHOSIAN: Q. Yes.

A. I don't know how to answer that. How can I give myself credit...

5 Q. Credibility.

A. ...credibility for making -- for living in the dorm a little more than what I had said here in 2010?

Q. Okay.

10 A. I do recall explicitly the main grade 9. In grade 10 it was back and forth. Grade 11 I was kicked off campus and sent to the community. Grade 12 I spent half the year in Don Farnsworth house and then I was put in the dorm. In grade 13 I lived in the dorm. So, this two years was -- I was attempting to generalize. Maybe it was...

15 Q. Maybe it was four years?

A. ...like I said, it -- it wasn't four years. I just told you it was back and forth for -- on and off for four years.

20 Q. In your affidavit you said on and off for two years; right?

A. I can -- as I said just a minute ago...

Q. Is that what you wrote there?

A. ...that -- sorry?

Q. Is that what you rote there?

25 A. I can read it.

Q. Yeah, that's -- then please answer my question.

A. There it says two.

30 Q. You told a story in-chief about you as a dorm supervisor would do checks of dorm rooms, going through doors -- drawers searching for contraband, looking for things like contraceptives and that you personally conducted a search of

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luggage and discovered a diaphragm which you turned over to Judy James, and they subsequently expelled the owner of that device from the school, or maybe suspended, you're not sure; right?

A. Yes.

5 Q. If we can look at your affidavit at paragraph 50, you -- were you ever a member of the A-Team...

A. No.

Q. ...while you were a staff member, Ms. Granger?

10 A. No.

Q. Okay. Number 50:

15 Dorm inspections happened regularly. When that happened the A-Team would go through our doors, included checking our clothing like underwear.

20 Skipping a sentence to the third sentence:

25 They would also check our possessions to see whether anyone was using contraceptives. If contraceptives were found the student could be expelled. They even went through the luggage that was store in the basement.

30 Do you recall swearing to the truth of that paragraph that I just read?

A. Yes, sir.

Q. All right. Nowhere in here does it say that

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you as a dorm supervisor conducted any of these inspections;
does it?

5 A. Apparently not, but I'm telling you
everything that is true that I know of today and that is why I
included myself yesterday. I've even tried to be scrupulous
honest and I'm not proud of having been part of that luggage
inspection.

10 Q. Ms. Granger, I'm -- I'm suggesting that in
your evidence over the course of the last two days you've been
trying to put yourself everywhere, to corroborate everybody's
story about how bad it was at Grenville?

A. Because I was everywhere.

15 Q. "They did the searches of luggage and dorm
rooms." Not dorm supervisors. That's what you swore...

A. That was...

Q. ...in 2010. Please let me finish.

A. Sorry.

Q. That's what you swore in 2010; correct?

A. Yes, sir.

20 Q. You testified yesterday that students always
had to get permission to use the telephone and it was frequently
arbitrarily denied. Do you remember giving that evidence?

A. Yes, sir.

25 Q. If we can look at your -- this is a
transcript of your -- do you remember being examined for
discovery in 2015...

A. Yes.

Q. ...in this action?

A. Yes.

30 Q. All right. If I can refer you to page 180.

MR. BOGHOSIAN: Sorry, Your Honour, I'm just --

Q. Sorry. Come back to the other reference,

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5 which I've mis-noted, but if I -- you have a document in front of you that I first gave you called "With" -- it's about an inch thick and it has "CX11" written on the corner. What I've done is I've written "ED" in the top right corner of your discovery transcript. I've written "CX11" on your 2011 cross-examination transcript. I wrote "AFF" in the top corner on your affidavit. So, if we can refer to the "CX11" document, the 2000...

THE COURT: I don't have those numbers. Can we just...

10 MS. LOMBARDI: Just use the dates?

THE COURT: ...use the dates of them?

MR. BOGHOSIAN: Yeah, it's the 2011 cross-examination transcript. All right. Your Honour, I'll come back to this point, because I'm not finding my reference.

15 THE COURT: Okay.

MR. BOGHOSIAN: Q. You talk -- spoke in-chief about a letter that was sent to you by a non-staff kid over the summer, I think it was between when you were in grade 10 and 11?

20 A. Yes.

Q. And the boy's name was Matt Wersvinski?

A. Wersvinski.

Q. And this is the boy that you had a crush on and you claim that that mail was opened by Grenville staff and was read to you in a censored fashion at a late session?

25 A. Yes.

Q. All right. And that's how they discovered you had this relationship with Mr. Wersvinski; correct?

A. Yes. That's not the only time that happened. It happened with another boy after I graduated in grade 13, Adrian Morris. I landed in another light session with an opened letter that I had not received prior.

30

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Q. All right. If the -- do you recall being cross-examined in 2008?

A. Yes.

5 Q. And you've reviewed this transcript in preparation for today?

A. I tried, it was very big.

Q. Well, you've spent the last two or three months preparing for today haven't you?

10 A. I received the transcripts a week before I got here.

Q. But you spent a large part of the last couple of months preparing to give evidence at this trial.

15 A. I didn't spend a month doing just that, but I did need a lot of therapy and needed time to prepare my courage, if you will.

Q. All right. I want to refer you to page 81 of the 2008 transcripts, which has CX08 written in the top right corner.

A. I think -- I think I have it.

20 Q. Page 81.

A. Yeah.

Q. In the top right, question 398.

25 QUESTION: Why were you on discipline for 29 days? It started out because I was found out to have a quasi-relationship with a guy, Matt Wersvinski. When I say "quasi" I had a crush on him. We had a crush on each other, but -- and then you go through the name.

30

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QUESTION 401: What grade were
you in?

Grade 11.

Were you having a romantic
relationship with...

Yes, I mean romantic
relationship I will define that,
we liked to talk to each other.

We wrote letter -- each other
letters a few times in the
summer. We had never hugged or
kissed, but yes I had a crush on
him.

How did this come to light?

He gave me a ring with a heart
on it and a small diamond and I
didn't tell anyone for the
longest time, but then I told a
confided -- another staff child
who was also in a relationship
under the table, so I thought I
could trust her.

And if we go on we will find out that she in fact
perhaps being light sessioned for her own relationship, coughed
up your name as possibly being in a relationship; right? That's
how the story goes?

A. Yes, that's how she told about the ring.

Q. You suspect that?

A. Well...

Q. Okay. But the point is that as you sit here

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your relationship with Mr. Wersvinski came to light because of that woman, Julie Rosen telling them about getting -- you getting a ring from that -- that boy; right?

5 A. I didn't -- it's clear I didn't include the entire story here. I -- I did mention the letters. I didn't -- I didn't think to mention...

Q. Yeah.

10 A. ...when you're being cross-examined to this extent, you don't remember every single thing I didn't put that that letter had been a source of a -- a light session, because I clearly forgot it in there.

Q. But "we wrote each other letters a few times in the summer", so do...

15 A. Do you know what I -- yeah, that's true. After the first light session with the letter, I then mailed my letters out with a fellow staff boy and then had Matthew write to me through him. He had to address the letter to Joe Bushnell. So, I got around it in whatever way I could.

20 Q. But in any event, I'm suggesting to you that this letter was not opened and read by staff and thereby the relationship was discovered, because the discovery of the relationship never came to light until the next school year?

25 A. No, they discovered the ring did not come to -- to light till the next school year. The letter had been read that previous summer, and as I just told you, I figured out a way to get letters from him through Joe Bushnell.

30 Q. It's very clear from what I've read that the -- it's the quasi-relationship with the guy Matt Wersvinski that came to light. I'm suggesting, if you read your evidence on this -- this cross-examination. Isn't that the fair reading of this?

A. I don't understand the question.

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Q. You don't even mention the ring until after you're asked, how did this come to light? What this is coming to light is your relationship with Mr. Wersvinski; isn't it?

5 A. I still don't understand the question. We're talking about...

Q. I'm suggesting to you that the relationship would not have first come to light when the staff found out about the ring he gave you, if they'd already opened the letter that made it clear you were in a relationship?

10 A. They knew that I like him, because of that letter.

Q. I see.

A. And then I had to keep the relationship between us, and when I say relationship it was basically a crush, a secret because I wasn't prepared to drop it. And when he gave me the ring I didn't tell anyone until I confided in a fellow staff girl...

Q. Okay.

A. ...Julie Rosen.

20 Q. So, you had a relationship with this boy, you wrote letters and flirted frequently; fair?

A. No, the -- the -- we -- there were probably three letters in total.

25 Q. All right. And you would talk and flirt on campus?

A. Not very easily.

Q. He gave you a ring?

A. He did.

30 Q. All right. And you -- the relationship was discovered when staff and fink found out about it from Julie Rosen, who you'd confided in about the relationship?

A. Correct.

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Q. And that resulted in you being put on discipline; correct?

A. Yes.

Q. And you were on discipline for 29 days?

5

A. Yes.

Q. And one of the reasons they gave for putting you on discipline is that you were a terrible example as a staff kid to the other students?

10 A. Yes, we got -- we were told from, like as - a very young age that we were required to be the examples for the students.

Q. Okay. And you were held to a higher standard and you were treated much more harshly than non-staff kids as a staff kid; right?

15

A. It seemed to me.

Q. Now, while I'm on the 29 days discipline, you mentioned that you confessed to shoplifting?

20

A. Yeah, near the -- after about three or -- well, I think it was right near the end I confessed to having tried shoplifting.

Q. And you told us -- told us yesterday that you took a chocolate bar and you -- you also stole a bra, which you said you needed for sports and your parents could afford to buy you one?

25

A. Yeah and I -- I mean -- to this day I feel great shame. It's not like I'm trying to excuse myself for that, but yes that's what I did.

30 Q. Okay. Well, you weren't exactly very candid and forthcoming about the whole story when you gave evidence yesterday, were you?

A. I don't agree with that.

Q. Okay. So, you stole chocolate bars from one

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store; correct?

A. I -- yes, I think it was two different stores.

Q. You stole a bra from Walmart; correct?

5 A. It was Woolco, but yeah.

Q. Oh really, why did you say Walmart on your discovery on your cross-examination?

A. That would have been a mistake, because Walmart wasn't in existence when I was young. They both start with "W" and when you are in cross-examination talking about shop -- shoplifting, it's not a very easy thing to be admitting.

10 Q. So, you said Walmart before. I'm -- I'm reading -- maybe we can all go to page 85 of the cross-examination transcript from 2008. If we start on page 85, let's say question 420. So, you're -- we pick up at 420 where you're -- you're just beginning to talk about confessing to Father Farnsworth that you had shoplifted.

20 I shoplifted --

At paragraph -- question 421.

I shoplifted, so I had to, so this was horrific. What did you steal?

25 ANSWER: Chocolate bars at one store.

That's correct?

A. Yes.

30 Q. I stole a bra, actually at Walmart, so that was the biggest thing. Correct?

A. Yes, it says Walmart, but that was a mistake.

Q. I can't remember it was three different

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stores. You see that on paragraph 423. So, there was -- you shoplifted from yet another store; is that correct?

A. I don't recall that.

Q. And I can't remem...

5 A. I wanted to -- oh no, it said three different stores and then -- oh yeah I remember.

Q. It was three different stores, anyway nothing more valuable than a bra.

A. That's what I...

10 Q. Right?

A. ...wrote, yeah.

Q. And...

A. The third place was, I took a book from a lady's -- the house where I cleaned on the weekend.

15 Q. Oh, I'm suggesting that's on the fourth occasion, madam.

A. It's not what I said.

Q. You stole from three different stores and you also stole a book from a house; correct?

20 A. I've made a mistake here with Walmart and I don't remember more than two stores. I had to go back and make restitution. I think I meant three different places, because the -- that lady on the weekends is Passmore. I had to go back to her house and give her back...

25 Q. Well, we'll...

A. ...a book that I had taken.

Q. ...let's -- let's read what you said at the time.

30 ANSWER: And I can't remember, it was three different stores. Anyway, nothing more valuable

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than a bra, so we had to go to
the stores, tell them what I had
done and make restitution. I
had to do that with my parents.

5

That's correct?

A. Yes.

Q. And they were mortified weren't they?

A. Absolutely.

10

Q. Oh yes, the other thing I stole was a book at
this lady's house where I was cleaning. I was cleaning on the
weekends.

You were working...

15

A. That was the third thing that I can remember
now.

20

Q. Well, I'm suggesting there were three stores,
as you very clearly say and -- and a book from a house of a
woman whose house you were cleaning to earn some extra cash;
right?

A. You can interpret that how you like.

Q. In any event, saying yesterday that you got
in trouble for just stealing two chocolate bars, or chocolate
bars plural and a bra wasn't being very candid and forthcoming?

25

A. Sir, I brought that up. I actually
implicated myself. Nobody caught me. I felt so much shame and
so much fear of hell...

Q. Okay.

30

A. ...by the time I'd been on discipline for
over a mon-- almost a month that I was willing to tell every
single sin that I could ever have committed...

Q. Okay.

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A. ...because I was afraid of going straight to hell.

Q. Yeah. The point here is about your candor in testifying yesterday and I'm suggesting, madam that you forgot to mention?

A. I forgot -- I did indeed...

Q. All right.

A. ...forget to mention the book at the lady's house.

Q. So, you...

A. There were three things and this is right. There were three things that I stole, or three item types that I stole and I said that clearly in 2008. And then I clarified my -- that it wasn't three stores. I clarified the third thing was at the lady's house.

Q. So, that's your interpretation, but I'm more concerned about the evidence you gave yesterday when you completely omitted...

A. The lady's house.

Q. ...to mention stealing the book from the lady's house, didn't you?

A. I forgot about that yesterday.

Q. And -- and this is a lady who was paying you to clean her house, so you could earn some extra cash on weekends; right?

A. Yes.

Q. And she was in fact a benefactor of the school?

A. Yes and I felt immense shame going back...

Q. She...

A. ...to - to tell her what I had done and she actually comforted me, like no one else had in this whole

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situation.

Q. Okay.

A. She -- she saw I was a mess. I was completely torn to shreds.

5

Q. Okay.

A. When a child steals when they're in high school, should it be that they are torn to shreds and sent away out of the country so they cannot attend school for the next seven months, or indefinitely? That is what happened and she was the only person who told me that it was okay and she forgave me. She's the only one who gave me any kind of shred of humanity.

10

Q. The point is, Ms. Granger you -- you omitted to tell this Court that you stole a book from this kind lady, whose house you were cleaning on weekends; didn't you?

15

A. I admitted that yesterday.

Q. No, you did not.

A. I said -- I omitted that.

Q. Yes, you did.

20

A. That is what I am agreeing with you.

Q. And I'm suggesting you intentionally omitted it to understate your culpability?

A. I did not do that.

25

Q. All right. And did you ever consider that you could have been arrested and charged and -- and prosecuted as a youth offender, did that ever cross your mind when you're feeling sorry for yourself about this?

A. Every possible -- every possible shame and kind of consequence was well communicated to me at that time.

30

Q. All right. But they didn't have you prosecuted. They didn't turn you over to the police, did they?

A. No, sir.

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Q. And if you were a non-staff kid, without a doubt you would have been expelled for this; wouldn't you have been?

A. I -- I don't know.

5 Q. Well, you -- you seem to know everything else about what happened, or would have happened at Grenville. You can't tell us if that's an expellable offence based on our experience there?

10 A. It seemed to me that it was an expellable offence.

Q. Yes?

A. I mean that's what they did to me, so...

Q. Well, no you got suspended effectively for six months.

15 A. Sorry.

Q. You got suspended effectively for six months. You were allowed to come back and finish your schooling; correct? So, to say you were expelled is -- is incorrect.

A. Okay.

20 Q. Isn't that fair? You came back and finished your school?

A. It was indefinitely. I didn't know what would -- but yeah.

25 Q. And you said a number of times yesterday and again today, just now, I was at the Community of Jesus for seven months.

A. Yes.

Q. That's what you're saying. And if you look at the transcript from 2008, page 87, question 430.

30

So, you were sent down to the
Community of Jesus, how long

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were you there for?

ANSWER: I stayed for six months.

Do you remember giving that evidence?

5 A. For the most time I thought it was six months
and then I -- as I was reflecting recently, I remembered I -- I
left beginning of February and didn't come back till the end of
August, which is effectively seven months. So, I have tried to
clarify that.

10 Q. The horrors just keep on expanding the longer
into this we go; isn't that fair?

A. Seriously?

THE COURT: Just answer the questions.

MARGARET GRANGER: The horrors keep expanding?

15 THE COURT: You have to answer no.

MARGARET GRANGER: I'm sorry.

THE COURT: The answer is no. If the answer is
yes, the answer's yes, but if you can't answer
the question...

20 MARGARET GRANGER: Okay.

THE COURT: ...you can't answer it.

MARGARET GRANGER: I was trying to be more
accurate when I said seven months.

25 MR. BOGHOSIAN: Q. Now, we've already
established that you were not just a boarding student at
Grenville College, you were a member of the Grenville community;
right?

A. Yes.

30 Q. And that's the community that lived full-time
on the Grenville campus -- campus and operated the school?

A. Yes.

Q. And in fact you were the first staff kid born

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at Grenville in 19 -- and that was in 1970?

A. Yes.

Q. And you lived in the Grenville community from the time you were born until 1998?

5

A. Yes.

Q. With the exception of the six months that you resided at the Community of Jesus?

A. Seven months.

10

Q. And you continued to live in the Grenville campus for nine years after you graduated high school in 1989?

A. Yes.

Q. And you -- you lived at Grenville for the entire time that you attended Queens and obtained your Bachelors of Arts degree?

15

A. Yes.

Q. And you got that degree in 1996?

A. Yes.

Q. And you continued to work while you were obtaining that degree at Grenville as well?

20

A. Yes, sir.

Q. And you essentially worked full-time at Grenville from 1989 until 2001?

A. Yes.

25

Q. For three years after you've moved off the Grenville campus?

A. Yes.

Q. And that's when you started your teacher's college certificate program at Queens...

30

A. Yes.

Q. ...in 2000 -- September 2001?

A. Yes.

Q. And you lived on Grenville campus voluntarily

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from 1989 until 1998?

A. That was required. You could not work at Grenville. You could not have any job at Grenville unless you lived on campus and committed to be there for life.

5 Q. But you told us that you moved off campus in 1998 and continued to work at Grenville full-time for three more years?

10 A. Yes, I also told you -- the Court that that was granted -- that was special permission I had. To my knowledge never been granted until that time when I requested it of Ken McNeil and the other administrative staff. They had to make that decision over the course of, I think it was two weeks that I had to wait to find out if they would allow me to do that.

15 Q. All right. And when you asked to finally stop working at Grenville altogether, you deemed it advisable to ask permission of the administration of -- of the community?

A. Of which community, the Grenville...

Q. Grenville community.

20 A. By then I don't remember it being -- me asking permission. I think I gave them 12 months' notice, once I knew that I had been accepted into Queens Bachelor of Education program. I don't remember if it was actually 12 months. It's unclear to me, but I gave them a long time notice.

25 Q. You took vows to abide by the teachings of the Community of Jesus when you were 21?

A. Yes.

Q. And that's several years after you graduated from Grenville?

30 A. Two years.

Q. And the primary reason that you left Grenville was that you were unhappy, because you realized you

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had no prospect of marrying if you remain living in the Grenville community, because you would have had to marry someone within the community and the -- there was no one there that fit the bill?

5 A. That was a part of the -- that was a part of why I was unhappy, but it was certainly not the only reason I left. I was very unhappy living there and working as a staff member, and I was unhappy with any of my future prospects.

10 Q. And your unhappiness as a staff member was because you were disciplined and treated even -- even more harshly that you claimed to have been as a student?

 A. At the -- I may have -- did I say that, sir?

 Q. I'm asking you if it's true.

15 A. I felt that way for a while and I have been. I mean, if you compare as a staff versus student, they would be holy bad. I may have said that being a staff member was even more a difficult than being student. From my perspective now I'm not sure that I would agree with that.

20 Q. Well, you told us about boot camp that you went through as a -- as a staff member.

 A. That was terrible.

 Q. You went through a year and that was as a staff member; right?

 A. Yes, sir.

25 Q. Where you had to sleep on a cot in a sleeping bag, in a living room with 11 other women; correct?

30 A. It was terrible. And I would add that the kind of abuse that we endured as staff affected the students, because we were terrorized and -- and demonized and felt completely demoralized, and if you feel that way, imagine how you will do as in your duties as a teacher, or a caregiver to students.

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Q. And you -- and -- and that's just to be very clear, how you felt you were treated as a staff member?

A. Yes, sir.

5 Q. Okay. And it was far more harsh, the treatment of you as a staff member than it ever was of you as a member of the Grenville community and student at Grenville?

A. I wouldn't far more harsh. I've given many examples of harsh treatment as a student.

10 Q. All right. So, you felt you had to ask permission when you finally left Grenville; right so you could leave on good -- good terms and not be shunned?

A. I wanted -- I was desperate to leave on good terms, yes.

15 Q. Okay. And this is when you moved off the campus; right?

A. Yes.

Q. An you asked permission and it was granted within a week that you could leave and still work at the campus; right?

20 A. I don't know that it was a week. It seemed -- I don't -- I don't -- I don't recall how long it took.

Q. It was a very short reasonable period of time that they got back to you and said that's fine you can live off campus and still work here?

25 A. Yes, but recall that Farnsworth was no longer the leader when I asked that permission, so I felt safer to ask them -- ask the permission to do that.

30 Q. Okay. And despite your telling them candidly that you were not prepared to continue honouring the vows you took to the Community of Jesus, they still let you leave and gave you permission; right?

A. Yes. Again, that was after Farnsworth

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retired, things were different.

Q. Now, you lived with your parents and two older brothers from ages -- of birth -- from birth to age 4?

A. Yes.

5 Q. And you lived with them from -- on the campus of Grenville in a trailer?

A. Not -- the trailer didn't come until I was about -- I think we got the trailer when I was about six. We lived in dorms before then, dorm rooms.

10 Q. And when you were five years old your mother was ordered to go live at the Community of Jesus in Massachusetts; right?

A. Yes.

Q. She was gone for at least a year?

15 A. Yes.

Q. Maybe two years?

A. I think it was about a year that time.

Q. Okay. And she was sent off, because she was deemed to be a sinner?

20 A. Yes, that was the extent of what I was told.

Q. And you were told that at the time; correct?

A. Yes.

Q. And you were told she was in need of reform?

25 A. She needed to change. That was always the terminology.

Q. And I'm suggesting to you that she was away for more than a year in total, between the time that you were five and the time you were seven?

30 A. I have been thinking about it and I recall when she away and I was five. I also remember her being away when I was seven or eight and then I recall again she was away when I was ten, because my -- she went away the third time with

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my little baby brother and they were away for about a year then.

Q. So, when you were eight that's when your baby brother was born; right?

A. Okay. So, she was away prev -- previous...

5 Q. Is that not the case? Are you eight year...

A. Yeah, he was -- he was born when I was just about to be nine. I was eight and I was turning nine.

Q. And your mother was then sent back to the Community of Jesus with your younger brother, who was an infant?

10 A. Yes.

Q. And they stay away for a year?

A. Yes.

Q. And you were told again that she had been sent away, because she was a sinner?

15 A. Yes.

Q. And while you were at the Community of -- while she was the Community of Jesus, on these three occasions that you mentioned for a lengthy period of time, you would cry yourself to sleep every night, because you missed her so much; right?

20 A. Yes.

Q. And these were traumatic experiences for you, being separated from your mother for such long periods of time at those young ages?

25 A. Yes.

Q. And while you lived with your father and older brothers, for periods of time during this range of times from age 5 to 10, you were also sent to live with a number of other families within Grenville; right?

30 A. Yes.

MR. BOGHOSIAN: Your Honour, if maybe we could take the break a little early.

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THE COURT: Yes. Let's take 20.

R E C E S S

5 U P O N R E S U M I N G:

MR. BOGHOSIAN: Q. Ms. Granger yesterday you testified that it was the policy of Grenville that students were required to seek permission and have permission to make phone
10 calls. Do you recall giving that evidence?

A. Yes.

Q. All right. And I'm suggesting to you that you gave very different evidence when you were cross-examined the -- for the very first time in this case in 2008; isn't that
15 fair?

A. In 2008 I couldn't remember what the rule and the policy -- I didn't remember the policy and I remember noticing that before I went into cross-examination in 2011, and I corrected that mistake in 2011's testimony.

20 Q. Well, in 2008 if we can refer to page 180 of that transcript that has CX08 in the top right corner on the front.

THE COURT: Sorry what page?

MR. BOGHOSIAN: 180.

25 THE COURT: 1-8-0?

MR. BOGHOSIAN: Yes.

Q. (Reading):

30 Question 891: You were a dorm supervisor?

ANSWER: I was.

And telephone use that did that

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require by way of permission?

ANSWER: I don't remember. I do remember limited use, like people would only get a certain number of minutes, but I don't remember them having to have permission per se.

Then that was what I'm getting at, you don't remember?

I don't unless they had been in some sort -- I might say that it is possible that if a child was in trouble for it, whatever reason then the dorm supervisors were very aware of who and when they called people.

Those are the answers you gave under oath in 2008?

A. Yes and under oath I corrected that in 2011.

Q. Okay. And I'm suggesting to you that in 2011 you did not testify as you did here yesterday, that students universally required permission for all the time you were at Grenville, did you?

A. I don't recall what I said in 2011. I do remember reading that I corrected it, because when I read this last week, I started with 2008 -- or two weeks ago and I read this part and I thought oh, oh, that's not true. I wonder if I said that all along. And when I read it in 2011 I was glad to see that I'd corrected that.

Q. Okay. So, you're -- you're happy with your answer that you gave in 2011?

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A. I don't recall that those -- the wording I used in 2011, but I recall having stated that I made mistake in 2008 about that.

5 Q. Okay. Well, let's go to the cross-examination transcript for 2011, page 72. And in -- I'm on page 72, question 358.

10 Now, communications, do you agree with me that if a student wished to use a telephone, a non-staff or regular boarding student wished to telephone their parents the student was entirely free to do so?

15 Well, I said in my last affidavit -- no not my affidavit my lost -- last cross-examination -- cross-examination answer into that, when I looked at it a few days ago, I said what, I couldn't believe I'd said that, because I remember now
20 having to as a staff member for a period of time, we gave out phone -- phone permission slips and you'd write them down and you could say, so I don't know why I said that they were allowed to. So, for a period of time, I don't remember the years, it was the policy that you had to get permission.

25 A. That was -- yes.

Q. Those are the answers you gave?

30 A. Yes and here I was referring to, I don't remember the period of time as I was a staff supervisor. I do recall that was the -- that was the policy all through being a student.

Q. As a staff member for a period of time we gave out phone permission slips. So, there was a period --

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periods of time, at least when you were a staff member that phone permission slips were not required; correct?

A. As I state here, I'm not clear on the dates.

5 Q. Is my proposition correct, Ms. Granger that there was at least a period of time when you were a staff member that phone permission slips were not required?

A. I can't say that for sure. I -- I remember our phone slips now, and I remember all through high school and I remember them. Since 2011 I remember giving out permissions.

10 Q. (Reading):

So, for a period of time, I don't remember the years it was policy that you had to get permission.

Do you adopt that answer?

A. That it was policy that we had to get permission, or they had to get permission?

20 Q. (Reading):

For a period of time, I don't remember the years it was policy that you had to get permission.

25 Do you adopt that here?

A. It was policy that they had to get permission.

30 Q. For a number of years?

A. For a number of years.

Q. For a period of time? For a period of time?

A. That policy ended at -- at some point, I

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5 don't remember when, but I was a staff and the dorm supervisor
up till '90 -- almost -- well, '98, so I don't recall. And
that's why I think I had a hard time remembering it in 2008,
because I was remembering the early -- the -- the nearest time
when I was a dorm supervisor. So, anyway it's hard to remember
every detail and I made mistake and I correct -- I corrected it
in 2011.

10 Q. That's saying for a limited period of time,
you can't remember the years...

A. I didn't say a limited...

Q. ...there was a requirement?

A. ...period of time.

15 Q. Well, for a period of time as opposed to all
time, is what you clearly said in 2011; right?

A. I said, "So, for a period of time, I don't
remember the years, it was policy that you had to get
permission." I stand by that.

Q. Page 74 of the same transcript, question 366.

20 QUESTION: I'm asking you
generally, non-discipline, your
average every day kid, every day
average, were they denied access
to call their parents or weren't
25 they?

ANSWER: Generally if you
weren't in trouble you'd be
granted permission.

30 You gave that answer in 2011?

A. I did.

Q. And you adopt it here today?

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A. That's what I said yesterday, you had to get permission and you would be granted permission if you weren't in trouble.

Q. In trouble meaning you're on discipline?

5

A. That was subjective. It was up to whoever you asked permission out of and if you were in trouble, or if you had been recently on discipline, they were more than likely to not grant permission and maybe refer you to the deans for those kinds of permission slips.

10

Q. Okay. So, you might have to go to the dean to get permission?

A. Yes -- yes.

15

Q. Now, we were talking about how you were forced to live with a number of different families within the Grenville community, rather than with your parents and siblings when you living at the -- in the Grenville community as a kid.

A. Yes.

Q. And in fact you rarely lived with your parents throughout your childhood did you?

20

A. I rarely lived with them.

Q. And you were often moved from home to home of other families in the Grenville community between the ages of 5 and 19?

A. Yes.

25

Q. And that was a very traumatic experience for you being shuttled around from home to home and not being able to live with your parents and siblings, wasn't it?

A. Yes.

30

Q. And I'm suggesting to you that being shuttled around from home to home like that, separated from your parents is very high on your list of -- your sources of emotional trauma that you sustained at Grenville?

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A. It was part of the traumatic experience.

5 Q. I'm suggesting that that circumstance of being shuttled around from home to home throughout your childhood is very high on your list of the sources of emotional trauma you suffered at Grenville; isn't that...

A. It was -- it was definitely a source of trauma. Particularly because I couldn't rely on my parents and I couldn't go to them for emotional support just like students couldn't do when they were boarding at Grenville.

10 Q. Okay. But they -- they went home on spring break, they went home at Thanksgiving, they went home at Christmas, they went home for the summer.

A. But I was there on campus with parents and I still didn't get emotional support from them.

15 THE COURT: I would be careful that you're not debating with the witness, rather than asking a question, and the last one was more of a statement, which can invite debate.

20 MR. BOGHOSIAN: Q. All right. Go to page 26 of the 2011 transcript.

THE COURT: Sorry page 28?

MR. BOGHOSIAN: Page 26.

THE COURT: 26.

25 MR. BOGHOSIAN: Q. Question 135, Ms. Granger do you see where I am, question 135 toward...

A. Yes.

30 Q. As I read your evidence you were taken, forced away from, whatever the correct words are, from your parents from time to time throughout your years at Grenville, correct and the earliest time was at age 5?

That's right.

And the occasion that when you

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went with your mother to the
Community of Jesus?

I gave -- that's right?

And I assume there's no doubt in
your mind when you look at your
emotional harm or mental
suffering that that was a very
traumatic harmful thing to do to
a child?

You gave those answers in 2011?

A. Yes.

Q. And you adopt those today, those answers?

A. Yes.

Q. And you said yesterday, I wrote down, that
the reason that you believed that you were moved around was so
the staff kids would feel that they were not in control. Do you
recall giving that evidence?

A. I -- I gave that as one of the reasons.

Q. You gave it as the only reason yesterday;
right?

A. I did not -- when I gave that as a reason, I
was not stipulating that's the only reason.

Q. Right.

A. It's the one I could think of yesterday.

Q. So, the one reason you speculated for why you
were moved around was that -- so the staff kids would feel like
they were not in control. That's what your evidence was
yesterday; right?

A. That was what I said yesterday.

Q. Yeah. And in fact if we look at your
affidavit that you swore with the AFF on it in 2010.

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A. Actually, sir...

Q. I'm sorry?

A. When you asked me, like when they asked me
that question...

5 Q. Please, I -- I would like you-- I would like
to focus on my question, which is to go to the affidavit.

A. I -- I...

THE COURT: Are you completing an answer to the
question, or are you...

10 MARGARET GRANGER: No, I completely answered to
his question.

THE COURT: So, the question...

MARGARET GRANGER: Because he said that we -- I
said that we were -- that I thought we were
15 moved, because we needed to be out of control.

MR. BOGHOSIAN: No, no, that's not what I said.

THE COURT: Let's -- let's roll it back. Ask the
question again before you get to the transcript.

MR. BOGHOSIAN: Q. The question...

20 THE COURT: And if it's something more to
complete the question, yes, but if not...

MARGARET GRANGER: Okay.

THE COURT: ...you'll wait for the next question.
What was the question again?

25 MR. BOGHOSIAN: Q. The question was, that your
-- do you agree that your evidence yesterday when you were asked
for what you understood the reason was why you were moved from
home to home, torn away from your parents throughout your
childhood was that it was so -- the staff kid would feel that
30 they had no control. That's the...

A. And I...

Q. Is that the answer you gave yesterday at

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least?

5 A. That was not what I was questioned yesterday. She asked me why we were moved around and that was -- I was talking about when I was a staff. And I -- because that was one of the abuses that staff -- she asked me about the abuses that we had as a staff member, and I used that as one of my examples. And I used that because we were meant to be out of control as a staff. But as a student, as a child there were other reasons.

10 Q. Well, there's one other reason...

A. ...that I believe that they did the moving around.

15 THE COURT: All right. So, just so that I understand the evidence, the evidence in answer to the specific question is, no, I did not give that answer, because I was asked about staff experience...

MARGARET GRANGER: Yes.

THE COURT: ...versus student experience?

MARGARET GRANGER: Yes.

20 THE COURT: All right. So, over to Mr. Boghosian...

MARGARET GRANGER: Okay.

THE COURT: ...and he'll ask the next question. I just wanted to clarify.

25 MR. BOGHOSIAN: Q. So, just to be clear, you were not saying that you felt that being moved around from home to home as a child was so that you would feel as a child that you had no control?

30 A. I said that the whole thing about being out of control, I was referring to the moving. Remember I said I was moved eight times, that was when I was a staff.

Q. Okay. So, you're agreeing with me then?

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A. I'm agreeing that...

Q. That that was not the reason you were moved around as a child?

THE COURT: The question was...

5

MARGARET GRANGER: I don't...

THE COURT: ...you did not say you were moved as a child to have no control, which is different from what are the reasons you believe were moved as a child. I'm not sure you're there yet.

10

MR. BOGHOSIAN: Q. All right. Do you agree with me, Ms. Granger that you do not believe that you were moved around as a child, so that you would be made to feel you have no control?

15

A. That was part of the reason, but there are many -- there was another specific reason, because we were not allowed to form attachments to our parents. In fact our parents were always being chastised for having the sin of adultery and they were told that they were the most harmful influence on young children, because if they showed love to us then they would harm us.

20

Q. If we could go to your affidavit at paragraph 6.

THE COURT: The...

25

MR. BOGHOSIAN: It's got AFF in the corner.

THE COURT: Okay.

MR. BOGHOSIAN: It's sits in the...

Q. Paragraph 6, the last sentence starting in the middle of the fourth -- fifth last line "It was understanding." Do you see that?

30

A. Yes.

Q. (Reading):

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5

It was my understanding that children did not live with their parents, because Father Haig and Farnsworth felt that parents would be too soft and that this would lead to adulatory on the part of the parents and children. That is we would revere our parents. Our parents would be love of children before their love of God.

10

That's what you swore to in 2010?

A. Yes, just what I said.

15

Q. And that's the only reason that you gave?

A. That -- that -- if I had to give a reason that would be the main reason that I understood.

20

Q. Well, did any of the A-Team, as you call them or Father Farnsworth specifically ever confide in you that the reason he was moving you around, so that you'd feel you had no control?

A. No, they gave this -- when I was a child this was the reason. Adulatory was spoken about all the time.

25

Q. So, the other thing is just speculation on your part, isn't it?

A. No, the sin of being in control was often spoken of when we were staff. That was a big sin. It's one of the reasons why I submitted to never becoming a teacher.

30

Q. All right. And that's why you were moved around as a staff member; correct?

A. It was one of the reasons.

Q. And it has nothing to do with why you were

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moved around as a child?

5 A. I would say that it was one of the reasons that I was moved around as -- as a child, but this, what I swore in -- was it 2010, if I had to give a reason this would have been it. The main kind of philosophy between -- behind the way we were moved from family to family.

Q. And this was a philosophy of the Community of Jesus?

A. Yes.

10 Q. And this was something that non-staff kids never had to endure; they were not torn away from their parents and moved from family to family, were they?

A. They were boarding students, so they did not live with their family and they were moved frequently between rooms.

15 Q. All right. The -- this being separated from your parents and moved from family to family at a young age, as young as five, through many years before you even got to high school was not something that any staff kid had to endure there, did they?

A. Don't you mean boarding student, because that's what happened...

Q. I said non-staff kid, boarding...

A. I'm sorry.

25 Q. ...student, non-staff kid.

A. Did you say non-staff kid?

Q. Yes.

A. Sorry I didn't hear you. So, boarding students who started in grade 7 were boarding on campus, and they were living in the dorms.

30 Q. They were not as young as the age of five through whatever age they were in grade 8, or grade 7, whenever

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they were not torn away from their parents and shuttled around from family to family within the Grenville community, were they?

A. That was not their experience, not as -- not as -- from ages 5 to 11.

5 Q. And Ms. Granger, I know you want to make the case for all the class, including the non-staff kids, but it's correct that you've lived the Grenville community 365 days a year, 24 hours a day; isn't that right?

A. Yes.

10 Q. You didn't get to go home to see your parents on spring break, you kept living with whatever family you were with; right?

A. I saw my parents every day, but...

Q. You weren't living with them?

15 A. I wasn't living with them all the time.

Q. All right. And you didn't get to live with them when the kids went home for Thanksgivings?

A. It varied. I sometimes -- I would -- I would always sit with them at Thanksgiving meals, but I didn't live with them all the time, no.

20 Q. And you -- you -- if you were living with another family at Christmas you stayed living with that family over the Christmas break; right?

A. Yes.

25 Q. And if you were living with a family over a summer, then you were living with the family, you didn't get to go move with - in with your parents for those months; right?

A. Correct.

30 Q. And during your childhood, or sorry, when you were in grade 7, I understand your parents moved from the trailer they'd been living in to a new townhouse building that the college had built to house the staff; is that right?

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A. Yes, there was -- there were staff apartments that were built in three stages and they were assigned an apartment in the first stage.

Q. Which was when you were in grade 7?

5

A. Yes.

Q. And you were not allowed to go to live in that apartment with them were you?

A. I was not.

10

Q. And not being able to live with your family in the new apartment, which you really been looked forward was a big blow to you wasn't it?

A. Yes.

15

Q. Now, you testified yesterday I believe that from the age of 13 onward you attended retreats at the Community of Jesus once or twice a year?

A. Yes.

Q. Where sermons and indoctrination took place?

A. Yes.

20

Q. I'm curious, because if we look at your 2008 transcript, if I can refer you to page 210, sorry 213.

A. I'm not sure which book.

Q. Oh, it's got the CX08 in the top right corner. It's the thickest book.

A. Okay.

25

THE COURT: I'm hearing noise by the -- noise I can control, so I'm checking with the reporter to make sure it's not interfering with our recording system. Sorry about that, 213.

MR. BOGHOSIAN: Q. Okay. Sorry it's 2010.

30

THE COURT: 210, 210?

MR. BOGHOSIAN: Q. 210, starting at question 1047. Okay.

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5 QUESTION 1047: In any event the
Community of Jesus would come up
and lead one of these retreats,
or co-lead it with Reverend
Farnsworth?

Yes, or we could all go down to
the Community of Jesus for a
retreat.

10 What time frame are we looking
at here?

I'm sorry for our retreats?

For the retreats.

Usually a three day event.

15 I'm sorry when did you start;
what years are we looking at, is
this...

Retreats happened two -- two to
three times a year from as early
20 as 1970's, like mid-seventies.

But you were not going on them
until you were a staff member?

ANSWER: But then I didn't --
yes, exactly.

25 QUESTION: So, when did you start
going?

I started as soon as I became a
staff member.

30 Did I read that correctly?

A. Yes.

Q. Do you adopt that answer, Ms. Granger?

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A. No.

Q. In any event it's very different than what the evidence you gave yesterday; correct?

5 A. Yes. I absolutely went in -- when I was 14. I'll never forget it.

Q. That was the mother daughter retreat...

A. Yes.

Q. ...that you spoke about at lengthy yesterday?

A. Yes.

10 Q. And that's the only retreat I'm suggesting you ever went on prior to becoming a staff member?

A. No.

15 Q. In any event, the boarding students were not required to go down -- down to the Community of Jesus on retreats were they?

A. They weren't required -- I have vague memories of -- in the eighties you could sign-up as a student if you wanted to go and they had a few opportunities where if students were taken down there, but that is a vague memory.

20 Q. All right. So, it would -- it was voluntary?

A. Yes but there were a few retreats where the mothers came up to Grenville and that was not voluntary, you had to attend.

25 Q. But you can't recall if boarding students were even required to go to those retreats, it -- as far as you remember it may well have just been for staff and staff kids?

30 A. No, I do recall at least three times when the mothers came and preached to the students. And as I said, I really clearly recall the one where Betty Pugsley came in, early nineties and she brought a teen with Ruth Vogue, Paul Tingly who was a -- Paul Tingly has been a student at Grenville Christian College and he moved down to -- he still lives at the Community.

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He was one of the members in their team. It was Ruth Vogue,
Paul Tingly, Collie Shackelford, Ron Minor, Bill Debauch and
Betty Pugsley. I'm pretty sure those -- and then there was
another time later nineties when Father Farnsworth was about to
5 retire and they sent some clergy up from the Community, who
lived on the campus. And I know Ron Minor and Father Lane were
one of those, they were clergy from the United States, the
Community of Jesus. So, students were definitely exposed from
time to time.

10 Q. All right. So, there are a couple of visits
by Community of Jesus officials in the eighties and once that
you recall in the nineties; right?

A. I just said twice...

Q. That's what...

15 A. ...in the nineties.

Q. Twice in the nineties, so twice in eighties,
any particularly year that you recall?

A. Well, I recall one -- no, that was just for
staff. I don't remember. It is -- it's -- it's the actual
20 dates are unclear, but I remember in the nineties.

Q. Now, when you were 16 years old in grade 11
you were sent down to the Community of Jesus for about six
months. Now, you say it was seven; right?

A. Yes.

25 Q. And you were sent down there because of your
membership in the Community of Jesus?

A. What -- I don't -- are you asking me that?

Q. I'm ask -- I'm suggesting to you that
boarding students would not ever be sent down to the Community
30 of Jesus for punishment?

A. I would agree with that.

Q. All right. And you were sent down, because

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you were a member of the Community of Jesus?

A. Well, I was a mem -- I -- I wasn't a vowed member and I wasn't a vowed member until I was 21.

5 Q. Okay. But your parents were and you were a member of the Grenville community by virtue of being a staff kid; right?

A. I guess you could say that.

Q. And you said yesterday that you lived with a family?

10 A. At the Community?

Q. Yeah.

A. Yes.

Q. You said you lived with one family for that six or seven months?

15 A. Two -- well it was -- it was a house filled with two families.

Q. A house filled two families, but always in the same home; correct?

A. I also slept in a different house.

20 Q. You did?

A. Yes.

Q. One different house?

25 A. As far as I can recall. I slept in the one for a few months and then had me sleeping in another one, but still living in the -- the original.

Q. So, you lived in a house and -- but so how you went at evenings when you had to go to sleep in another house?

30 A. Yeah, because the first house that I was sleeping in, they had me sleeping in their living room and it became -- well, they had a sort of den, and it became kind of awkward for me to be sleeping in there, so they found a bed in a

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house that was down the road where I was to sleep. And it was with some other community girls my age. And then I would spend the day in the original house.

5 Q. Okay. And all the cleaning and menial tasks that you described that you had to do there were all in that one house where you primarily lived?

A. Yes.

10 Q. Okay. If I can have you -- there's a thinner volume that's marked "ED" in the top right hand corner.

THE COURT: Sorry which -- which volume is it?

MR. BOGHOSIAN: It's got "ED" marked in the top right...

THE COURT: Thank you.

MR. BOGHOSIAN: ...corner.

15 THE COURT: So, the examination for discovery, October 5th, 2015.

MR. BOGHOSIAN: Q. Page 20, question 90. Page 20, question 90.

20 I forgot the question. I think it was how many different families did you live with down there, to the best of your recollection?

25 And you'll see from the previous questions it's clearly about your time at...

A. I'm lost. You said page 20?

30 Q. Yes, question 90 of the document that has "ED" written in the top.

A. On page 20 it has question 82.

THE COURT: Maybe it's the wrong volume. Does --

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does the witness have both thin volumes?

MARGARET GRANGER: ED?

THE COURT: ED.

MARGARET GRANGER: October 5th, 2015?

5

MR. BOGHOSIAN: Your Honour what -- what -- do you -- do you have question 90 on page 20?

THE COURT: I do.

MR. BOGHOSIAN: You do?

10

THE COURT: I do. If you'd like to pass this to the witness, I've had a look at the question.

MR. BOGHOSIAN: Well, the...

MS. MERRITT: It just says page (indecipherable).

THE COURT: I'll trade. I'll take the one back and you can use mine.

15

MARGARET GRANGER: Okay.

MS. MERRITT: I don't know if I did it wrong, or...

THE COURT: No, no, maybe it's bound differently.

MR. BOGHOSIAN: I...

20

MS. MERRITT: Yeah, it's different.

MR. BOGHOSIAN: In any event I have another copy.

25

THE COURT: This is a different date. This is October 6th, that one's October 5th. So, must have been the next day. Don't worry we'll -- we'll sort it out. Mr. Boghosian have you got another October 5th transcript? Leave that one with the witness for now.

MR. BOGHOSIAN: She wasn't examined more than one day.

30

THE COURT: Sorry.

MR. BOGHOSIAN: She was not examined for discovery more than one day.

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THE COURT: Well, that's -- Oh, that's -- this is Lisa Cavanaugh. This one you shouldn't have. Sorry we figured it out.

MARGARET GRANGER: So, what should I do?

5 THE COURT: Wait for the question. You can keep that book and counsel I'll make notes, so just put the question exactly if you can from the transcript.

10 MR. BOGHOSIAN: Your Honour this appears that the transcript that has the right pagination...

THE COURT: Thank you.

MR. BOGHOSIAN: ...and I would...

Q. All right. Do you recall being examined for discovery in 2015?

15 A. Yes -- yes.

Q. And you recall being asked at:

20 QUESTION 90: I forgot the question. I think it was how many different families did you live with down there to the best of your recollection?

ANSWER: Three.

25 A. Yes.

Q. So, you said three on this occasion in 2015?

A. Yes.

Q. And it's a different answer today; correct?

30 A. There were two peop -- two main families in that -- that house and then as I said, I lived -- I slept in another house. And there was another family that would come in during the day. A woman with her children and I was recalling

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her, because I would have to take care of her baby.

Q. And while you were down there you testified before that you were treated like a slave doing menial tasks...

A. Yes.

5

Q. ...is that right? And you were constantly watched and judged and indoctrinated?

A. Yes.

Q. You had light sessions at every meals at the Community of Jesus?

10

A. Yes.

Q. And that six or seven months you spent at Gren -- sorry Community of Jesus was a highly traumatic experience for you wasn't it?

A. Yes.

15

Q. It was traumatic that you couldn't wait to get back to Grenville?

A. Grenville was what I was used to.

Q. It was tame by comparison?

20

A. I wouldn't call it tame, but it was where my family was, at least.

Q. All right. In any event you couldn't wait to get back to Grenville after that stint at Community of Jesus; right?

A. Is that what I said?

25

Q. I'm asking you the question.

A. I definitely wanted to get back to Grenville.

Q. And when you got back you didn't move back with your parents did you?

A. No.

30

Q. And you didn't move back to the dorm?

A. No.

Q. You lived with Don and Sue Farnsworth for

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about five months; correct?

A. Yes.

Q. And they treated you fairly and it was a fairly normal experience wasn't it?

5

A. Define normal.

Q. Well, let me take you to the 2008 transcript, page 89.

A. Sir, you didn't define normal, so I didn't really answer the question.

10

Q. It's your words that's why I'm taking you to them to...

A. Did I say it was a normal experience?

15

THE COURT: Let's -- let's wait for the question. If counsel does not define it and doesn't re-ask the question, he may be just allowing that answer to be the record, but I'll...

MR. BOGHOSIAN: Q. I'm -- I'm referring to the transcript from 2008, Ms. Granger, page 89. So, question 440 on page 9.

20

You were in residence at this stage. This is when you came back to Grenville from Community of Jesus?

25

We see that from page 437 -- question 437 at the top of the page.

30

440: Well, I've been part -- when I left I had been in the dorm, but then when I came back I was placed in Don Farnsworth

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house to live with their family.

And skipping to 443:

5

What was that like? What were he and his wife like to you? They were fair. I mean, when I say fair I mean it was fairly normal. They would have light sessions there as well where they would continue to point out my sins.

10

15

So, you're the one that used the term "fairly normal".

20

A. Yes, so I would like to elaborate that. It was fairly normal for the type of life that I was living at Grenville Christian College and at the Community of Jesus. And I further clarified that they would have light sessions where they continued to point out my sins. I was basically on probation at his house and I really wanted to get back into the dorm, which I finally was granted the -- the -- the privilege to do after about five months, as I said.

25

Q. Okay. Now, light session is a term that you repeatedly used in-chief isn't it?

A. Yes.

30

Q. And what you intended to mean by that is the session carried out in the public forum where Father Farnsworth or his designate -- designate would give a public lecture on a topic of morality, or sometimes one of -- one or more of those in attendance students would be stood up in front of the student body?

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A. That was one type of light session.

Q. That's a public light session?

A. A public full school light session, that was one type that happened at Grenville.

5 Q. And I'm suggesting to you that during your entire time at Grenville the term light session was not used to refer to any -- anything other than the sessions held at meetings of staff members?

A. The terminology changed throughout the years. It was used more prevalently I believe when I was young, but they wouldn't say, okay everybody come for the light session at -- at, you know in 15 minutes at the chapel. It wasn't announced as such, where you came to understand that that's what it was and it wasn't -- it was a term that was just part of the sort of tradition at Grenville, if you will. So, I don't know when it -- when it was at -- I don't think it was like advertised. You wouldn't say, like I said, Father Farnsworth wouldn't stand up and say, okay now we're having a light session.

20 A. Yeah and...

Q. And you wouldn't be called into a meeting to say, all right it's time for light session.

Q. ...and the students wouldn't say, oh we're going to another light session, or we just had a light session would they?

A. I don't recall.

Q. All right. The term -- the terminology was not used at that time, I'm suggesting while you were there at Grenville?

30 A. What -- oh yes it was.

Q. Light session?

A. I was there for 30 years.

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Q. It was only used to describe sessions involving staff?

5 A. No, it was part of the policy and it -- it was just a practice that started with the mothers and just kept continuing. Whether or not it was labelled at such, I don't think it was ever put on paper.

10 Q. Okay. All right. I'm suggesting to you that the term light session was mostly if not exclusively used for staff and staff kids to describe sessions with staff and staff kids?

15 A. It was -- that was clear, because as I say it was never published that the -- that we were putting -- that light session -- it was never on paper or you couldn't know to expect it and it was never announced light sessions were happening.

Q. All right.

A. It was just part of the fabric of life there.

20 Q. I'm suggesting to you that the students during your time at Grenville didn't refer to sessions where they would get lectures from Father Farnsworth of any nature as a light session?

A. Oh no, the students definitely knew that they were called light sessions, especially in the -- the earlier decades.

25 Q. The earlier decades, what are the earlier decades?

A. Seventies and into the eighties.

30 Q. All right. If we can look at your transcript, 2008, CX08 at the top right corner on the front.

THE COURT: What page?

MR. BOGHOSIAN: Page 27, question 147 at the bottom.

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Q. So, there was the -- the light session in the church. Do you see where I am?

A. Yes.

5 Q. Do people refer to them as light sessions back then, like if you're going into that church would they say, oh we have Beth Granger was, or Gilles at the time was subject to a light session today. I'm using that in quotes.

10 ANSWER: Sometimes there were various terms, it could have been we have a huge assembly where it turned into a light session.

15 I understand sometimes you didn't know where it was going?

ANSWER: Exactly.

20 But when you left would students identify that verbally as being a light session?

Maybe not, because light session term, in my mind was mostly used for staff and staff kids.

25 Do you recall giving those answers in 2008?

A. Now I do.

Q. And do you adopt that answer, Ms. Granger?

30 A. Well, the reason I said that was because it was my understanding, even back then that light sessions were -- they were used or they took place all the time with staff and staff kids and were more random with the students. So, that's why I would -- that's how I tried to explain it there.

Q. And then you recalled the reason why you gave

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an answer in 2008?

A. That's what I'm -- that's -- that's my -- that's how I'm trying to explain it now.

5 Q. Well, I'm suggesting that this term "light session" didn't come into common use among former students until the Fact-net website arose and this pejorative term was attached to these public lecture sessions that you are now describing and no doubt everyone else is going to describe as a light session; isn't that right?

10 A. No, light sessions were definitely a part of Grenville. And the students who were boarding -- and I actually don't know too many people who are on Fact-net who were staff kids. We weren't in there infiltrating, trying to tell everybody here's what you're supposed to call it. They knew it from having been there.

15 Q. And light sessions I think you just said were common occurrence at meetings of staff?

A. Yes.

20 Q. And there were common occurrence at meetings of staff kids?

A. Yes.

Q. Where non-staff kids were not in attendance?

A. Yes.

25 Q. And sometimes there were light sessions after meals in the dining hall with staff and the staff kids after the boarding students had all left?

30 A. When the boarding students were at school from September to June, light sessions would happen all the time at meals, or after meals. People would keep students, boarding students back and lecture them, and not just lecture, point out their sins and chime in about their infractions, and all the things we've been discussing. That was normal, not just for

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staff or staff kids.

Q. Okay. There were many, many more light sessions for staff and staff kids than there were for the boarding students; isn't that right?

5 A. They were more, because we were there 365 days a year...

Q. You were...

A. ...and they worse during the summer, which I've already said, but they definitely happened during school --
10 school sessions and we just took what we had learned from the Community of Jesus and meet, and it was -- it was also drummed into my brain that these students who came as boarding students were there, because God wanted them to change. So, this was staff and especially the Farnsworth's opportunity to inflict
15 that change and the light sessions were the way that they went about it, for the most part. There were other disciplines as we've discussed.

Q. I'm suggesting, Ms. Granger that during the school year there were so called light sessions held in the
20 dining room after meals that only staff and the staff kids were in attendance at, after the non-staff kids had -- had left; is that fair?

A. That is partially true. As I just said, there were also light sessions happening with non-staff kids.
25 They would happen all over the dining -- you -- on a typical meal you -- if you came back maybe ten minutes later, you would see at least -- at least meetings happening with small groups of people, at least two or three after each meal on any given meal. And that would involve students as well.

30 Q. All right. And light sessions were a common occurrence at meetings for staff; correct?

A. Yes.

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Q. And at the sessions that only the staff and the staff kids were in attendance at, you'd be forced to watch your parents be berated and humiliated in -- in front of the entire gathering of staff members?

5 A. Yes.

Q. And that was a very traumatic experience for you to watch; wasn't it?

A. Yes.

10 Q. And you were subjected to staff -- these so called light sessions at practically every meeting of staff kids?

A. Can you repeat the question?

Q. You -- there would be meetings once or twice a week of staff kids only?

15 A. Yes.

Q. And those meetings would frequently turn into light sessions for the staff kids?

A. They were light sessions for the staff kids.

20 Q. All right. And that was for the staff kids only?

A. Yes.

Q. And these staff kid meetings that invariably in turned into light sessions occurred even more over the summer holidays and Christmas, and spring break?

25 A. Yes.

Q. And there was one staff kid only light session following a staff kid trip to Canada's Wonderland?

A. Yes.

30 Q. Where you were all -- or a number of you were balled out for making a rock and roll video?

A. Yes, we -- we -- you can make those videos at Canada's Wonderland and two groups of us made a -- try to make a

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music video. Mine was You've Lost That Loving Feeling and the other one was Beach Boys song. And we thought we would -- it would fun to record ourselves singing these. We didn't even know the words, and we got in a terrible light session back at Grenville, because we were -- I remember distinctly being told that because I was moving my hips to the music beat, that I was looking like a seductress and a temptress and lustful woman. And this was all in front of at least 20 kids -- staff kids, plus the A-Team and it was extremely humiliating.

10 Q. All right. And I'm suggesting that that was only staff kids on that trip?

A. Yes.

15 Q. And there were only staff kids in the ten minutes of the light session that followed it for making that rock video; correct?

A. Yes.

Q. And as a staff kid you were exposed to easily two to three times the number of light sessions that the non-staff kids were exposed to; is that fair?

20 A. I would say so, yes.

Q. And you in particular got it even worse than the other staff kids, because you were deemed to have a bad attitude or be rebellious; true?

25 A. Yes, I got a lot more targeting and I've come to understand it wasn't just my attitude, but I was -- I was targeted because I had natural talent in music and in academics, and I was definitely the brunt of a lot of -- of light sessions because of my haughtiness and my desire to do well.

30 Q. And -- and you don't think it had anything to do with breaking a clear rule about no romantic relationships between the sexes? You don't think it had anything to do with that?

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5 A. Once I was on the radar for having had a
relation -- well, a relationship with this boy, I certainly was
treated as though I was worse sinner than your typical staff
kid, but prior to that I was under a lot of pressure, because of
my so called sinning in my mind and my attitude, and my
rebellion, which I did -- I didn't understand, because prior to
grade 11 I'd never actually broken obvious rules, like the
relationship issue. And that was a really confusing hard pill
to swallow, where I was always under the gun for having a so
10 called bad attitude.

Q. And -- and you don't think it has anything to
do with the fact that you stole three or four times on a school
trip as a -- a school outing as a staff kid?

A. I...

15 Q. You don't think...

A. ...I just...

Q. ...the focus on you had anything to do
with...

A. ...so the focus on me...

20 Q. ...legitimate reasons?

A. ...so the focus on me would -- I just
stipulated that happened from, let's say as early as grade 6 to
grade 11. In those years I was extremely targeted and it had
nothing to do with my relationship and my episode of
shoplifting, because that hadn't happened yet. I was -- I felt
25 like a horrendous sinner by the time I was in grade 11 for
having a bad attitude and being rebellious, and being haughty.

Q. Okay. Wouldn't the right way to express it
being episodes, plural, or shoplifting isn't that more accurate
30 than episode?

A. What -- what did I say?

Q. There were more than episode; right? There

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was more than one episode?

A. Yeah, but I was describing that have -- having -- having happened in grade 11, and prior to that I had been the subject of many, many light sessions.

5 Q. And you testified in-chief that there were maybe two to five public light sessions per school year involving the -- the student body as a whole?

A. Yes.

10 Q. Sometimes only once a semester, once a half a school year?

A. It was -- it's -- it's -- I speculated that it could have been only once a semester in some occasions. As I said it was never the same from year to year.

15 Q. All right. And I'm suggesting that you certainly can't remember a non-staff kid ever being hauled out of bed in the middle of the night to attend a light session, can you?

A. I testified that I couldn't remember their names, or -- I -- I don't remember when I said that, but I couldn't remember their names when I testified.

20 Q. And -- and there was a grand total of one time that it happened to you where you were woken up in the middle of the night to be questioned...

A. For myself?

25 Q. Yes.

A. I was woken up one time that I could remember.

Q. And that was in the summer when school wasn't even in; right?

30 A. Yes. We had a light session that started at 3 a.m., all the staff kids from -- as young ages as -- I don't know five or seven, were brought to the chapel with all the

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staff and Farnsworth preached at us all night long, well into the next day. And then we got to have confessions after that.

Q. And that was in the summer involving staff and staff kids only?

5 A. Yes.

Q. And in terms of light sessions in front of the entire student body, you -- that only happened to you once where you were ever called up?

A. Yes, that I can recall.

10 Q. There's one time and that was when you were in grade 9?

A. Yes.

Q. And you were called up before the student body in the dining hall. By the way when you were -- after you confessed to shoplifting, you weren't put -- put through a public light session where this was exposed to the entire student body was it?

15 A. No.

Q. It was kept private wasn't it?

20 A. Yes, by then I'd been on discipline for -- as you know almost four weeks.

Q. But they saved you the embarrassment of you having to publically confess in front of the entire student body and staff to having committed a crime; right? They didn't make you do that did they?

25 A. They didn't exactly save me any embarrassment. I was shipped off without anybody knowing why and I was publically humiliated for four weeks on discipline, so I call that embarrassing.

30 Q. Okay. But no one called you out in front of the -- any public forum and outed you as a shoplifter or a thief; right?

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A. No, not on that occasion.

Q. So, in grade 9 you were called up before the student body in the dining hall for acting out and being a discipline problem?

5 A. Yes, that's what they said to me.

Q. And this all stemmed from the fact that you regarded one of your teachers, Chuck Farnsworth as a buffoon?

A. I did recall -- I did -- I -- that was my opinion.

10 Q. All right. And he was having a really hard time controlling his class, because of you and a few other students making fun of him basically behind his back and disrupting his class; right?

A. So, I've been reflecting on this, because I
15 believe -- I -- I had so many light sessions and so much sin attributed to me, that I believed what they told me. And I had been thinking about this for the last few months, and -- not just this, but this came up. And I actually believe that they, you know what they told me, that it was my fault that that class
20 was unruly, and I couldn't understand it, because I never used to do anything, obviously out of line in classes. And it's become clear to me that what happened was that the class was unruly and I simply did not turn people in and I did not tell on people when I saw them misbehaving. And I was expected to do,
25 so that is why I got in so much trouble and I was deemed to be a ring leader. And I -- I just took it.

Q. Ms. Granger, I'm suggesting that you're
attempting to re-write history here on in this courtroom to
advance the class action, contrary to the truth of what actually
30 happened, that you testified several times to under oath in the past. Isn't this all a re-write of history...

A. No, sir.

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Q. ...to -- to colour the proceedings to make things look so much worse than they really were?

A. To be scrupulously honest, I have been up here admitting to things that I'm deeply ashamed of, like the --
5 the shoplifting.

Q. Well...

A. I am telling you, sir that as I've been reflecting on this particular reason for being in trouble in grade 9, with Chuck Farnsworth as the buffoon, that I thought
10 him to be, I wasn't -- as -- as student in his class, I just -- I desperately wanted to have some students from the outside world accept me and I wasn't prepared to turn them in.

Q. Okay. Let's go through what you said in 2008. Now -- now you've said you been scrupulously honest, but
15 were you trying to be scrupulously honest when you testified under oath in 2008?

A. I 2008 that was my first year of therapy after being in Grenville for almost 30 years. I did not in any way understand the kind of abusive language that they piled on
20 me for so long, and I didn't see things clearly at that point. It's been years and years of uncovering things and when I testified in 2008, I still felt guilty about having been in that classroom not turning kids in and I thought, yes, I must have been a rebellious student, just the way they told me.

Q. Okay. You never mentioned in 2008 or at any other time until you got to this trial that you were public
25 light sessioned for not turning people in...

A. Because now...

Q. ...isn't that correct?

A. ...I'm finally understanding a lot of what was told me was lying to me about my sin. And I'm now finally
30 understanding that I was a kid, who's sitting in that class not

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willing to turn people in, but I had understood for all those years that they thought I was the ring leader and I was not.

Q. Or Ms. Granger...

5 A. But I understood that and I've listened to their messages that were piled on me repeatedly for all those years and I believed them. I thought I was a terrible, negative, rebellious child, because I stood me up and blamed everything on me.

Q. Can you turn to page 23 of the 2008...

10 A. And in 2008 I still believe them.

Q. ...can you please turn to page 23 of your 2008 transcript? Let's start.

15 Question 123: So, you remember on one occasion it happened to you, and that's a public light session?

Yes, there may have been others. But you can't recall?

20 Yes.

What happened that led to you to being the one who was singled out?

25 It was in grade 9 and -- and I was yet again having a bad attitude, disrespectful. It was specifically about being disrespectful with Chuck Farnsworth, who was out
30 geography teacher. And we would -- we considered him to be a kind of buffoon as far as his

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5 teaching style, so I was always
very desperate to be accepted by
the students, because staff kids
were mistrusted by them. So, I
would often try to, I don't know
misbehave I suppose in class,
where you were doing things
behind the teacher's back and we
would make fun of him. He was
10 having a really hard time with
our class specifically, and I
was deemed to be the ring
leader.

QUESTION: Were?

15 I was part of a group of about
five people who could probably
consider that.

20 So, there was some acting up in
class and you were one of the
five; rightly or that you were
wrongly -- that was yes, sort of
encouraging that?

25 So, the way this was, the way to
deal with this, the school again
rightly or wrongly had one of
these grand scale light sessions
and you were asked to stand up.

30 Is that the evidence so far that you gave about
the circumstances leading up to this public light session?

A. Yes, that is how I saw it in 2008.

Q. Right and you were sworn to tell the truth on

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occasion?

A. I was the telling the truth as I saw it...

Q. All right.

5 A. ...as it appears, victim for having been
living there for 30 almost years, almost 30 years.

Q. Ms. Granger you were trying to win the trust
of your fellow non-staff students by being the ring leader and
acting up in class, so you could appear to be one of them.
That's the gist of your evidence here, isn't it?

10 A. I -- that's the -- that's as I saw it in
2008, in that regard. I -- I was doing my best to tell the
lawyers what I remembered and what I believed happened, and what
I thought.

15 Q. Yeah. And you say you just were sitting
there quietly, hands folded, saying nothing, doing nothing, not
being a participant whatsoever in any disruption of Mr.
Farnsworth's class. Is that your evidence, you did nothing,
other -- the only thing you did is sitting there in silence
instead of ratting on the other students? That's your evidence
20 today?

A. My evidence today is that I did not tell on
people as I saw them acting up, and I did laugh at Chuck
Farnsworth from behind his back.

25 Q. And you contributed to the disruption and the
joking around and making fun of that teacher; didn't you?

A. I just told you I laughed when people would
do things, like set alarms off.

Q. And you would participate in hijinks like
that as well, wouldn't -- wouldn't you?

30 A. No, I just laughed and I didn't tell him. I
was expected to tell on them. I was expected to stand up
against their rebellion and I did not do that. So, as result I

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was in deep trouble.

Q. All right. And you weren't stood up on the stage alone were you, other ring leaders of this disruption of Mr. Farnsworth's geography class were stood up with you;

5 correct?

A. There were other staff kids in that class.

Q. So? I'm asking you, were you stood up...

A. They were stood up with me, two.

10 Q. Oh, so only staff kids were stood up, not non-staff kids, is that your evidence?

A. That I recall, yes. It was Dan Bails, Joe Bushnell, Julie Rosen...

Q. Okay. So, only staff kids...

A. ...who were all staff kids.

15 Q. ...no non-staff kids stood up over this Chuck Farnsworth...

A. That I recall.

Q. ...incident? Okay. That's your -- your recovered recollection now of this event?

20 A. Yes.

Q. And these other kids were also stood up as being ring leaders?

A. Yes.

25 Q. And no other -- no teacher or any of the other students were asked to mock or shame on this occasion when you were stood up publically?

A. Not that I recall. Well, I mean, we -- we received the regular tongue lashing from the -- the deans.

Q. Well, you said...

30 A. ...and Julie Case was there.

Q. ...he would often open it up to the entire assembled body to hurl -- hurl mock and shame at you, but

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that...

A. In this one...

Q. ...didn't happen?

A. ...I don't recall that.

5

Q. That didn't happen?

A. Not on this occasion.

Q. And you weren't that embarrassed about this single public light session that you recall being through to, were you?

10

A. Compared to the other -- other times that I was in trouble, this one wasn't as embarrassing to me.

Q. It wasn't particularly -- a particularly devastating episode, was it?

15

A. Well, I was used to being in trouble, so if I got in trouble for looking like I had been disrespectful in Chuck Farnsworth class, it -- it wasn't as bad as being shamed and humiliated for my -- my rebellion and when I was just -- when I couldn't pinpoint why I was being in trouble, or getting in trouble for -- like I found when I was on discipline for having a rebellious attitude, or being haughty, I found that to be more shameful, because I didn't actually break rules, like when I was put on discipline in grade 6. The only reason I was told was because I was haughty and had a rebellious attitude and I found that to be extremely shameful and embarrassing, but in this case no, I didn't feel as...

20

25

Q. You felt it was deserved?

A. I didn't feel it was deserved, but I felt not quite so devastated by it.

30

Q. All right. And you'll agree with me that if it happened, mocking a teacher and pulling pranks in his class, to the point that the entire learning environment is disrupted, is a pretty mean thing to do to the teacher; isn't it?

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A. Yes.

Q. And -- and that would be worthy of at least some censure; wouldn't it?

5 A. Yeah, I think that it -- it was -- it would be justified to have a supervisor or a dean come in and say knock it off everybody.

10 Q. And I'm suggesting to you you've -- you've told us about words that Father Farnsworth would use, like jezebels and sluts, and whores and I'm suggesting to you words like that, you were -- you were not called those names, you were told not to act like those sorts of people; right?

A. We were called those names. I was called -- it -- those words and those labels were used so often, it actually -- I just, I normalized them.

15 Q. All right. And I'm suggesting to you that the only time you were even called -- or told not to act like those sorts of things, was when you were censured for having a relationship with Mr. Wersvinski?

20 A. No, I was in all those blue lounge light sessions with Father Farnsworth, where he was calling the girls those names.

Q. Yeah. Did you ever use the term "blue lounge" sessions in any of your affidavit, or two cross-examinations or discovery transcript?

25 A. I don't recall.

Q. If I can refer you to the cross-examination transcript from 2011, page 63.

30 QUESTION 318: When they use that session to draw these relationships and the fact the relationships generally to the

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attention of the student body
and made it absolutely clear,
then in the mind these things
were wrong and wouldn't be
tolerated?

5

Yes, and they added that we are
all bitches in heat and you know
lusting after boys, or causing a
boy to lust after us, I since
remembered this. That's really
the only time I can remember
being called that. But yes, it
was against the rule to have
relationships, but I would say
that they went too far in making
girls feel like, you know,
street walkers and virtual
prostitutes and sexual deviants,
which is how we were made to
feel.

10

15

20

We're talking about your
experience?

Yes, in my experience at that
point was with this boy and I'd
never even hugged, so...

25

All right. That's why I said
they perceived...

Yes.

Now, I'm going to suggest to you
that there were not -- they did
not call you bitches in heat,
they said you were acting like

30

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bitches in heat.

ANSWER: Yes, we were acting
like bitches in heat.

5 Do you remember giving those answers on your --
under oath in 2011?

A. I do recall those answers.

Q. And...

A. I also asked is that somehow better?

10 Q. Well, that's fine, that's your commentary.
I'm not asking for your opinion on it. I'm asking you if...

A. We would be told that we were acting like
bitches in heat and all the other things that I told you, you
know, they -- that we were bitches in heat, that we're acting
15 like bitches in heat. I said that right there. I said that
they made us feel like we were street walkers and virtually
prostitutes and sexual deviants. I -- I stand by that.

Q. All right. So, you adopt the answers that
you gave that I've just read into the record on pages 63 and 64
20 of this transcript?

A. That's as I remembered it, yeah.

MR. BOGHOSIAN: Your Honour, would this be a
convenient point to break or lunch?

25 THE COURT: Sure. Do you have sense about how
much longer you'll be?

MR. BOGHOSIAN: I'm hoping to finish by the end
of the afternoon.

THE COURT: Okay. Then we'll take the lunch
break and we'll return at 2:30.

30

R E C E S S

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U P O N R E S U M I N G:

5 MR. BOGHOSIAN: Q. Ms. Granger, I'm going to suggest to you that you were subjected to perhaps three private light sessions per year while you were in high school.

A. Private light sessions?

Q. Yes.

A. Okay.

Q. Is that true?

10 A. I'm -- I was subjected to a lot of staff kid light sessions. And as far as the private ones, I would say it would true on the years where I was in trouble three times.

15 Q. I'm suggesting that you were subjective to maybe three private light sessions a year while you were in high school; is that yes or is that no?

A. It is really hard to quantify.

20 Q. All right. Can you refer to cross-examination transcript from 2008? So, let's start on page 52, question 258 and this was a discussion of light sessions, private light sessions and it says:

Question 258: Were you subject to these types of meetings?

Oh, yes.

25 How often?

I'm trying to quantify it. It is hard to quantify, because it all becomes a blur now and because it happened all through my years as an employee too as well.

30 Can you focus on your high

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school years?

High school, okay. Where I was
the subject, I'm going to say
three times a year. Let's say I
think that would be fair.

5

You gave those answers on this cross-examination?

A. On -- in 2008 that's how I remembered it.

Q. Okay. And you're saying that through the
last couple of months, two to six months of therapy you suddenly
recovered all sorts of additional memories that you didn't have
in 2008?

A. I've -- I've -- I have repressed a lot from
my years at Grenville and in the last six months, no -- yeah,
six months I have been forcing myself to remember more than
ever.

15

Q. Yes.

A. I am agreeing with you that that's what I
said in 2008.

20

Q. And that is your explanation for why so much
of what you're saying in this Court this week is different than
what you said in 2011, in your transcript of cross-examination
2011? It's just been suddenly in the last six months as you're
preparing for this trial that you suddenly recovered all these
memories from 30 years ago?

25

A. You just said that 2008 and 2011 are
different from each other, but now you're saying that I'm
different now, so I -- I'm getting confused...

Q. Your evidence is different...

30

A. ...where my differences lie.

Q. Well, you'll agree we pointed out a number of
differences between what you've said in this trial and what you

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said in your 2008 transcript?

A. There were a few details...

Q. A few -- a few details?

A. ...that you uncovered. Two as I recall.

5 Q. So, you would characterize them as a few details?

A. Well, that's what you've been outlining today.

10 Q. Okay. And there's also been differences between your testimony at trial here and your 2011 cross-examination transcript answers; right?

15 A. You're asking me right now about light sessions, that's what I'm focusing on. So, what I said there, three times a year in private light sessions, private light sessions where very intense and didn't happen every day.

Q. You never experienced anyone yelling or screaming at you during any of these private light sessions did you?

A. They were yelling.

20 Q. They were yelling?

A. They were also speaking very sternly. It is a blur and it's not something I like to remember. In fact I have repressed a lot of it, and I would disassociate during those -- those light sessions as well.

25 Q. Everything's a blur with what went on during that time, even today, for you isn't it?

A. No, it's not all a blur.

Q. It's largely a blur isn't it?

A. No, sir.

30 Q. And I'm suggesting...

A. A lot of it is, but I was there for almost 30 years...

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Q. ...I'm suggesting...

A. ...and I normalized it.

Q. ...I'm suggesting that you're filling in gaps
with fabricated evidence...

5 A. That is not true.

Q. ...that you brought -- actually do not have
an independent recollection of from 30 years ago?

A. I am being as honest as anyone possibly can
with my abilities of memory.

10 Q. If I can refer you to the examination for
discovery transcript, page 22? It says "ED" in the top corner.
And then question 22, page -- sorry page 22, question 97.

15 What I'm trying to get a sense
of, is what form did these light
sessions take in the sense of,
would they be addressing the
problem with you in a reasonable
voice, screaming at you. Can
20 you help me have some
understanding of what form these
sessions would take?

At that point in the year, I
believe that...

25 QUESTION: With the
Farnsworth's?

As long as you can call a light
session reasonable, which you
can't, I don't recall screaming.

30 I do recall I was feeling
targeted and being judged and
feeling paranoia, because

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5 basically all the time, so
whether or not they weren't
screaming didn't really matter.
It's just a continuation of the
types of constant judgment and
criticism and shaming that I was
used to.

You gave those answers on your discovery?

10 A. Yeah, like I hoped that everyone heard what
you just said, because I do recall feeling targeted, being,
judged and paranoid, basically all the time. So, whether or not
they were screaming didn't really matter.

Q. Ms. Granger...

15 A. They either screamed, or at some children and
sometimes they didn't, but they continually and constantly judge
and critic and shamed us.

Q. My question had been...

A. So, yes I do agree with that.

20 Q. ...did you give this evidence on your
examination for discovery?

A. Yes, sir.

MS. LOMBARDI: Sorry, Your Honour.

25 THE COURT: Counsel's on their feet, please pause
for a sec.

MS. LOMBARDI: Sorry to interrupt my friend, but
if we could perhaps read the -- the prior
question and answer, because I think it'll give a
different context that's achieved. They were
30 talking it seems about a specific -- a specific
light session in -- at that point in that year
with the Farnsworth's, so if my friend's question

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is too -- too general to all of her light sessions.

5 THE COURT: Well, it does appear that, Mr. Boghosian was asking about the form and whether the tone of voice, but I think where we're getting off track a little bit is the witness's giving explanation before you're asking the question.

MR. BOGHOSIAN: Right.

10 THE COURT: So, perhaps if I could just ask you to answer each question one at a time, even though you think you may know what the question's going to be next and either to explain any consistency or not. If the -- if the question is just was that the question you were asked and was that your answer, then the answer is either yes or no to that one. So, if you wait for the next question, I think that might -- is there something more you wanted to say, Ms. Lombardi?

15 MS. LOMBARDI: Yes, Your Honour, please. Might -- might we read question 96, because I think in this exchange she's answering that particular question. So, that question asked:

25 [And for example]: When there was some issue real or perceived from your perspective about house rules or requests being made of you, what form did the light sessions at the Farnsworth house generally take?

30 [And the answer was]: I was

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called to their living room or
it would be in the kitchen, et
cetera.

5 MR. BOGHOSIAN: What -- you -- Your Honour the
reason I felt comfortable asking this question,
were generally was because she -- the witness
answered it in answer to question 98:

10 I don't recall screaming. I do
recall always feeling targeted
and being judged and feeling
paranoia.

15 MS. LOMBARDI: This is with the Farnsworths.

MR. BOGHOSIAN: And I'm suggesting that that's a
more -- much more generalized statement of her
experience with light sessions.

20 THE COURT: I think having had counsel read from
76 and then when you see the witness interject --
or no, I -- I suppose its counsel's question,
with the Farnsworths? Can -- so the question --
the whole question appears to be at the bottom of
97. "Can you help me have some understanding of
what form these sessions would take?"

25 The witness starts to answer and then the
question continues. "With the Farnsworths?" So,
I think the - the point it well taken that a fair
reading of this suggests that the witness is
30 being asked about the tone of voice during a
light session with the Farnsworths. So, I think
the point is well taken, but you're -- you're

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free to follow it up.

MR. BOGHOSIAN: Okay.

Q. Ms. Granger, you lived with the Farnsworth's for five months after you returned from the Community of Jesus?

5 A. Approximately, with Don and Sue Farnsworth.

Q. Right. And...

A. And the Childs.

Q. ...and you indicated that they gave you light sessions from time to time in their home?

10 A. Yes.

Q. And I'm suggesting to you that some students may never have experienced a private light session, whereas others may have experienced several during their time at Grenville?

15 A. Yes.

MR. BOGHOSIAN: Your Honour, do we need to repeat that exchange or were you able to get it?

THE COURT: I heard it.

MR. BOGHOSIAN: Okay.

20 Q. Now, I want to go back to something I was talking about with you before the break and I want you to go to the 2011 cross-examination transcript. Do you have it?

A. Yes.

25 Q. And if I can refer you to page 89? We were dealing with comments that Father Farnsworth were made to female students.

A. Yes.

30 Q. All right. So, if I look at the second paragraph of the answer at the bottom of page 89, under question 248. You say:

So, anyway I think -- and the fact that Father

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5 Farnsworth, you know, that was the message, but why did he have to call people, you know, girls that, you know, why did he have to yell at them saying -- or us saying that, you know, if we act like bitches in heat this will happen and, you know, if we act like stuff, some whores, those returns and used commonly.

10 QUESTION: Yes and he said them in the context during effect don't act like this, don't act like bitches in heat, or sluts and sometimes used jezebels and temptresses?

ANSWER: Yes.

15 QUESTION: In that kind of context?

Yes, but I don't think that justifies...

20 I'm not suggesting it doesn't, I'm just asking the question about the context.

25 Well, he may have said it, you know, don't act like that, which is how I, you know, sometimes remember it, but he would also -- would call people those things directly. He would call people...

What did he call people?

30 Well, now we're talking about other people's stories?

Yes.

When you were personally present

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what did he call someone on an
occasion when you were
personally present?

5 When I was personally present it
would have been what I told you
in that meeting.

You recall giving those answers and providing --
answering those questions on that occasion in 2011?

10 A. Yes, I'm just not sure what that meeting
refers to.

Q. This was a -- this was a meeting -- if we go
back a number of pages where Father Farnsworth gathered the
female students and lectured them on chastity and...

15 A. Like at the blue lounge, like I talked about?

Q. Yes.

A. Yes.

Q. And those are the answers that you gave on
that occasion?

20 A. Yeah I was referring to what I'd already
said, that he had said in the meetings with the girls in the
blue lounge.

Q. Well, I want you to stick to what I've just
put to you.

25 A. Well, you just put it to me.

Q. You adopt...

THE COURT: Ask the question again.

30 MR. BOGHOSIAN: Q. All right. Do you adopt the
answers that you gave commencing in the last paragraph on page
88, down to the bottom of page 90, that I've just read out to
you? You gave those answers.

A. I'm just trying to ascertain here, because

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you asked or somebody asked me what would he call people? And I said, now, are we talking about other people's stories and then they said yes, when you were personally present what would -- what did he call someone when you were personally present? And I said when I was personally present; it would be what I've told you already in that meeting, which is date -- pages. I understand you just said it was pages ago, so I don't know what I said.

Q. Well, no you just said that you --

He would say them in the context of in effect don't act like this, don't act like bitches in heat, or sluts and sometimes he'd use jezebels and temptresses?

Yes.

QUESTION: In that kind of context?

Yes, but I don't think that justifies...

A. I'm -- I'm just trying to make sure that I'm understanding the question.

Q. The question is simply. The question is, do you adopt the answers that are set out at the bottom of page 89 and the point where I ended and your answer to question 433 on the bottom of page 90?

A. I'm sorry; I still don't know what I was referring to. We had so many different kinds of light sessions and I -- I try to be extremely careful in how I answered things, so that I was answering them from the best of my recollection. And I don't realize -- I don't understand what I was referring

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to in this context.

THE COURT: Well, if you look at page 88, now maybe it would help to go page 88.

MR. BOGHOSIAN: Which page?

5 THE COURT: 88 of the transcript, line 423. It appears as though the prelude to the section that you're asking the witness to adopt begins there.

10 MR. BOGHOSIAN: Q. All right. And the context for this, I'm suggesting Ms. Granger is found, as Her Honour pointed out on page 88, question 422.

15 In addition to dumping on you every time there was some perceived wrong or sin of this nature, and these things I gather could happen on school occasions, so they could happen on other occasions; right?

20 Yes.

25 And in addition to that, I gather that there were one or two sessions a year where Farnsworth would call the girls together and lecture them in a school setting; right?

30 And I'm suggesting to, if you want to read to yourself. And the central message was that any sexual behaviour of its kind was totally wrong at your stage in life and you should not do anything to incite boys. So, it was in the context of those one or two sessions a year where Father Farnsworth addressed the female students, which I think you've

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MR. BOGHOSIAN: Yes.

MS. LOMBARDI: I don't think that the witness is being put the question fairly in the context of this transcript.

5 MR. BOGHOSIAN: I -- I read the entire page, Your Honour.

THE COURT: You did.

10 MR. BOGHOSIAN: And indeed it turned out that she was never personally present as -- as the next question reveals at any time when women were directly called those names. And that I stopped when it would start to turn into hearsay, at the bottom of the page.

15 THE COURT: You are quite right, you -- you put the whole section that was read to the witness. Have you had a chance to read -- now that you know what's being talked about, which are the sessions, one or two times a year when Farnsworth would lecture the girls. The question is just
20 when you re-read what's said there, do you adopt that? In other words, do you agree that that's what you said and that that was accurate? That that's really the question I believe counsel's asking you and if you need time to read through
25 it carefully, I appreciate this is...

MARGARET GRANGER: Why did he -- I don't understand why he just said I wasn't there.

30 THE COURT: Well, what you need to do, I think to take us back to the beginning is start with where counsel asked you to read. Read to -- just to yourself and it starts at 428 on page 89, and I believe counsel you took it all the way over to

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the bottom of page 90 at the...

MR. BOGHOSIAN: Stopping when it was starting to turn into hearsay, right. So, we...

5 THE COURT: Stopping with "I've heard stories", because that's getting into hearsay. So...

MR. BOGHOSIAN: Yeah, I stopped there at...

THE COURT: Right.

MR. BOGHOSIAN: ...at that word -- after the first sentence of the answer to question 433.

10 THE COURT: All right. So, Ms. Granger just take your time, read through it and we want to get your best evidence.

MARGARET GRANGER: When he said, "Were you personally present, what did he call someone on an occasion when you were personally present?" And I said "When I was personally present it would be what I told you already in that meeting." And I stand by what I said.

15 MR. BOGHOSIAN: Q. In -- in this transcript?
A. Yes.

Q. In the passage I've just read to you?

A. Yes.

Q. Now...

20 THE COURT: Mr. Boghosian, I've -- this is not an exhibit and I made notes, but because of the back and forth on this, I'm wondering if at least this extract could be filed at some point, so just I have a good record of it?

MR. BOGHOSIAN: I will.

25 THE COURT: Thank you.

30 MR. BOGHOSIAN: Q. Now, I'm suggesting to you that you have no recollection of whether on the couple of

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occasion that Mothers Judy -- Julian (sic) Kay came to Grenville, whether they ever spoke, whether it be lectures or light sessions with the non-staff kids?

5 A. It's -- the -- the memory is vague, but I do know that they came to the school and I remember us preparing, with the students for the occasion, and I remember it was an event that students have talked to me about since.

Q. I beg your pardon about students talking to you since?

10 A. Yes.

Q. So, you're basing your evidence on hearsay, what other people told you?

A. I was there.

15 Q. All right. Here's what you said in 2011, if I can refer you to page 4 -- 49 of the 2011 transcript. Well, let's start on -- let's to be absolutely fair, start on page 47, question 40 -- 241. Now, what I want to ask you is this -- are you with me, 241?

A. Yes.

20 Q. When you're talking about retreats and light sessions conducted by Mother Kay and Mother Judy, those were just community things, not non-staff kid things; right?

ANSWER: Not exclusively.

25 Well, I'm going to suggest to you that there wasn't any retreats where the student body at Grenville went off on retreat with Mother Kay and Mother Judy?

30 Well, they did come to visit the student body and they did have retreats with the student body on a couple of occasions.

Well, I'm going to suggest to you that they came to visit and they had retreats, but the student

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party -- body was not part of those retreats?

They did preach to the students, yes.

They preached to them?

Which could be the same thing.

5 And that -- that wasn't a light session, it
wasn't a retreat, was it?

10 Well, a retreat could take many forms, but they
came and they were on a retreat and they did
speak to the students in the eighties, at least a
couple of times. I have the memories of that and
when they spoke to the students they were
definitely giving their take on religion and all
of their ideologies. Also in the early nineties
they sent up a bunch of leaders from the
15 Community, not Mother Kay and Mother Judy, but
some of the other leaders. I won't mention their
names, for the better part of a week preaching to
the students and it was called a retreat.

20 That's what you're referring to in this paragraph
then?

Yes, we were talking about retreats and light
sessions. I was referring to my memories, which
include all of those things, but when it comes to
retreats and light sessions, yes, with Mothers
25 Kay and Judy.

I'm going to suggest to you that all that was
happening in terms of the staff kids, was that
Mother Kay and Mother Judy preached on one or two
occasions to them in the chapel?

30 ANSWER: No.

Well, what else did they do?

We the staff kids, non-staff...

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5 Oh, to the non-staff kids. My memories are a little vague as to the extent of which, you know, the preaching that they conducted when they were up at Grenville College, so I'm not going to argue that point I suppose.

10 So, your memories were vague as to whether the entire student body had been audience to Mother Kay and or Judy on these retreats that they had where they came up to Grenville; isn't that right?

15 A. Well, yes, but I did -- I think I just heard you read what I said previously a couple of minutes ago, without this.

Q. You...

A. That they came up on -- in the eighties, at least a couple of times. They spoke to the students, the non-staff kids.

20 Q. Yeah, it's a pretty clear that at the end of this you're conceding that you do not have an accurate memory of whether non-staff kids were involved in those lectures, or sermons by Mothers Judy and -- and Kay.

THE COURT: I think in fairness, line 251:

25 My memories are a little vague
as to the extent of which, you
know, the preaching.

30 I'm not sure that it is as to whether or not it was non-staff or staff. Just in fairness to the witness.

MR. BOGHOSIAN: Oh.

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THE COURT: If there's another place that you can point me to, I'll...

MR. BOGHOSIAN: Well, it -- her answer, Your Honour is:

5 Oh, to the non-staff kids, my memories are a little vague. It's all about the non-staff kids.

THE COURT: But if the rest of that sentence is read:

10 My memories are a little vague as to the extent of which, you know, the preaching that they conducted when they were up at Grenville Christian College, I'm not going to argue that point I suppose.

15 MR. BOGHOSIAN: And I'm suggesting to the witness that her memories were vague as to whether non-staff kids were involved in those lectures or not.

20 THE COURT: All right. That's a different question. I just think using a little care. The language -- I appreciate I wasn't there, but just when I read it off the page it -- it bears to mean, but I'll let you ask the question you just proposed, which is different from what does that?

25 MR. BOGHOSIAN: Q. I'm suggesting to you, as per this answer on page 251, after the lead up that I've given you, that you don't have a very strong memory of whether non-staff kids were ever privy to lectures or sermons by Mothers Judy and Kay in the eighties?

30 A. I have a -- a -- I have a memory of it. I just, as I said, don't recall the extent to which they were subjected to it, but I do stand by the previous few pages where

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I -- I mentioned, same thing I did this -- this week, that the mothers did come up and conduct retreats to the non-staff kids.

Q. You just don't know the extent of it?

5 A. I can't tell you which years and I can't tell you how many hours or days.

Q. Now, you were a straight "A" student throughout your time at Grenville?

A. Apparently, and I say that because I just saw the transcript yesterday for first...

10 Q. The teachers all liked you?

A. I don't know if you can -- how -- how would I know that?

Q. You perceived that they liked you?

A. That's a subjective question.

15 Q. You're able to tell us that all these girls were terrified and in fear at these lectures by Father Farnsworth, but you can't tell me if a teacher -- if you perceived a teacher liked you or not?

20 A. Well, I didn't say that they liked me, but I'm -- that's a subjective opinion. I was a good student and I didn't cause trouble, and I was inquisitive and I did my best. So, if me being a teacher if I had a student like myself in my class, I would like me very much.

25 Q. You were never in trouble with any of your teachers, except Chuck Farnsworth; right?

A. Not that I can recall.

Q. And you always felt that the teachers treated you fairly?

30 A. In class I didn't have, that I can recall any other problems or disciplines.

Q. And you never -- you were never disciplined in fact by any teacher at the school?

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A. Not in class.

Q. Well, the teachers weren't the ones that meted out the discipline it was the A-Team; wasn't it?

5 A. Some of the A-Team members were teachers, Don Farnsworth, Jim MacNeil, Dan Ordolani. Oh, and John Childs.

Q. And the Community of Jesus certainly did not make decisions about how the school was run as far as you know?

10 A. Oh yes, they were very much involved in terms of -- I want to say they, Mother Beatty, as I mentioned yesterday she would routinely come to Grenville and have retreats with the staff. And upon her -- after she would have light sessions with the staff, she often made job changes, so...

Q. All that. I'm suggesting...

15 A. ...that directly affected the staff and by extension the students.

Q. They made no decision about how the students should be treated as far as you're aware?

20 A. Well, it was because of their whole light session public and private shaming rituals that we conducted those in the first place, starting in 1973. So, they definitely affected the students. Plus discipline was another policy that they -- that they affected the students with.

25 Q. All right. And you testified yesterday that you did not see your grades or receive any awards or recognition from the middle of grade 9 onward. Did I note that correctly?

A. I think so. It -- it was unclear, because it looked like I received something in grade 9 as well.

Q. I'm not asking to go by the documents; I'm asking to go by your independent recollection?

30 A. My recollection was when I was 14 I was not allowed to see my grades anymore.

Q. And you didn't receive any awards or

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recognitions you said from that point onward?

A. Not at the graduation, or on the honour roll in the hallway.

5 Q. Well, you did receive some recognition now you're telling us?

A. No, I was just saying that I did not receive it in the honour roll and I didn't receive it at graduation. I was used to receiving a lot of awards at graduation by grade 8 and after that it stopped.

10 Q. All right. And this was a condition you said was imposed when you went down to the Community of Jesus with your mother for this mother daughter retreat?

A. Yes.

15 Q. And it was the Community of Jesus people that imposed this condition on you?

A. In that case, yes.

Q. And it was imposed on you as a member of the community, not because you were a student?

20 A. Yes, it was one of their philosophies that we should not be haughty and we should not be proud of ourselves, and so they were making a pet example of me for that reason.

Q. And from grade 9 -- mid-grade 9 onward you didn't receive any other awards or recognition is what you're telling this Court?

25 A. I did believe I -- if I recall in cross-examination there was a -- from previous years you produced a newsletter where I was mentioned having -- or actually it was just yesterday she produced that newsletter and I was mentioned as being a public speaker in a couple of
30 tournaments, and I might -- might have been mentioned as saying public -- the poetry contest.

MR. BOGHOSIAN: All right. Could I have Exhibit

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I put to the witness, please?

THE COURT: This? Okay.

MR. BOGHOSIAN: Q. So, this is from your
academic file at Grenville.

5 THE COURT: What tab?

MR. BOGHOSIAN: Oh Tab 37.

Q. See, so we are seeing that 1984, '85 if you
flip to the back of the first page at that tab they noted you as
having an 84, 85 when you would have been in grade 9; correct?

10 A. Yes.

Q. That you had the highest average in grade 9?

A. Somebody wrote that in, yeah.

Q. And someone wrote that you were second place
in grade 9, 11 for poetry recitation in grade 9?

15 A. Mm-hmm.

Q. Yes?

A. Yes, that was within the school.

Q. And you achieved the same status in grade 10
with respect to poetry recitation?

20 A. Yes.

Q. And then they have you noted as being first
place in that in grade 11?

A. Yes. Those were not grades those were just
an opportunity for my -- for me to say the poem that I said in
class in front of the student body.

25 Q. All right. And -- and then in '87, '88 you
didn't appear to have any notations in grade 11. That's the
year you were away at the Community of Jesus for a considerable
period of time?

30 A. Yes.

Q. And then grade -- '87, '88 you would have
been in grade 12?

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A. Yes.

Q. And they have you noted as having outstanding work in grade 11 French, honourable mention in grade 11 mathematics, grade 12 History and Physics, other awards you were on the headmaster's list. What's the headmaster's list?

A. I'm not entirely sure. It -- it might be -- I don't know.

Q. And is that your handwriting?

A. No.

Q. Have you seen this before seeing in this -- in this booklet?

A. I actually haven't noticed this.

Q. Noticed what?

A. Well, I was given this last week, I think on an email and I actually didn't see this part.

THE COURT: Has it been established what record this is? Like who filled it in, do we know?

MR. BOGHOSIAN: Well, my friend put it to the witness. This is their booklet that they prepared and they put it to the witness as -- as it being her academic record. She said that it -- some of it was in her own handwriting.

Q. Can you give us an example of entries that are your handwriting?

A. I wrote my name at the top in my handwriting.

Q. That's it?

A. Yes.

Q. Nothing else? Nothing -- no other...

A. I don't think so.

Q. In any event, in grade 12 it says you received a certificate of merit for academic achievement? Do you see that under other awards?

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A. I -- I do see that.

Q. Did you receive a certificate?

A. I do not remember receiving anything.

5 of the second -- the opposing page, which is a continuation of
grade 12...

10 THE COURT: Sorry to interrupt, counsel, I just
-- I would like the witness to please step out of
the room for a minute and I would like to raise
something with all counsel, but in the absence of
the witness about the records. So, sorry to
interrupt, but I -- I think it will assist, so
give us a minute, Ms. Granger.

15 ... WITNESS EXCUSED

20 THE COURT: So, I think to understand the cross,
but also in fairness to the witness, I think it's
important for me to understand how this was
created. I know it went in on consent as part of
a book of documents, but I may be making
assumptions about -- that aren't fair, so if the
witness wrote her name on them, I don't know when
she wrote it. If it's something to do with the
25 beginning. I don't know if teachers filled this
in. I don't know if you're able to kind of
stipulate what it is, but it's -- it's hard to
know what to make of it. It may or may not be
that if she should have known or that she got a
30 copy at some point. I can't tell. She's
testifies that she wasn't allowed to see her
grades and you're putting to her things as if

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5 maybe she knew that she got these other awards,
or maybe she got the awards and they never told
her, I don't know. I'm just struggling a little
bit with understanding the document. So, can you
help me?

MS. LOMBARDI: It came from the defendant's
productions.

10 MR. BOGHOSIAN: It's a business record. It -- it
purports to document her activities over the
course of her -- her scholastic career at
Grenville.

15 THE COURT: So -- so it goes in on consent, but
if you go back to her old tests for business
records, normally you hear about the duty to keep
it and who kept it. It was never put to -- we
had two members of staff here.

MR. BOGHOSIAN: We haven't called any witnesses
yet.

20 THE COURT: Fair enough, but you're now putting
it to this witness in cross-examination without
having perhaps taken the opportunity to show it
Joan Childs, who was the Dean of Women and may
have been able to say oh that's my handwriting,
or yes we kept these and this is what they looked
25 like. Nothing critical, I'm just saying, because
I don't -- I don't think we're yet into *Brown v.*
Dunn territory, but it might have assisted me if
a foundation had been laid as to what the
document is, because I'm not sure this witness,
30 other than knowing about some of the facts can
help with the document.

MR. BOGHOSIAN: Well, I -- I feel a little

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prejudiced, Your Honour, because my friends were allowed without any objection on your part to put this very record to the witness and -- and extract statements from her, like look I -- looking at this I never got credit for anything after grade nine.

THE COURT: Right.

MR. BOGHOSIAN: I'm trying to point out that's not the case.

THE COURT: All right.

MR. BOGHOSIAN: I mean, unless you're going to disregard all that evidence as being based on something that lacks foundation.

THE COURT: It's just getting clear to me, that it's hard for me to know what this document is, but your point is well taken, that she did give evidence in-chief about the document. She recalls not knowing if she received these awards. So, perhaps we just need to continue on that foundation as incomplete as it may be, given that that's where we started. I thought I would ask you all the question, because you may know something I don't and I would like to know if you know.

MS. LOMBARDI: We don't.

THE COURT: If this is the best we have, then let's -- we'll continue, so thank you. Mrs. Granger can come back in.

...WITNESS RETURNS

MR. BOGHOSIAN: Q. Ms. Granger, the -- we were

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dealing with grade 12, which was your '87, '88 academic year.

A. Yes.

Q. And we were noting that you received a number of awards or honourable mentions and you received the headmaster's -- you were on the headmaster's list. You received a certificate of merit for academic achievement and this was all recorded in your school record. Yes?

A. I see it there.

Q. All right. And you would have received these awards at the time, the certificate of merit; you would have seen the headmaster's list that was posted?

A. Again, I don't know what the headmaster's list means. At our school, if you were on the honour roll that's what it was called the honour roll.

Q. And you received second place senior for poetry recitation in grade 12?

A. That -- I guess so. I mean, I did well in poetry all through school and that's why they chose me to represent Grenville at in New York and Montreal.

Q. New York and Montreal, was that for debating or was that for poetry recitation?

A. Poetry recitation.

Q. And you also went other places...

A. We had to also -- I think we had to speak extemporaneously and in -- they had a variety of challenges at those public speaking competitions, but my speciality was poetry recitation.

Q. All right. And under drama -- there's a heading under drama, do you see that for both grade 12 and 13, it has you listed as G and S orchestra?

A. Yes, I was pulled off the stage in the -- the roles that I was given and I was always told to play in the

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orchestra.

Q. Well, my question was what is G and S

orchestra.

A. G and S, Gilbert and Sullivan...

5

Q. All right.

A. ...Orchestra.

Q. So, you were in the orchestra, according to these records?

A. Yes.

10

Q. And -- and there's nothing about sewing costumes in either of these years. Is that...

A. That was a discipline and I don't believe there's a heading for disciplines here.

15

Q. All right, so if we can go to Exhibit 2. If I can have Exhibit 2 put to the witness. I think it's on -- to your right on the -- this doc -- if you go to Tab 67. This is described as Grenville Christian College news, December 1988. Do you recall a student, or a school newspaper called the GCC News?

20

A. Yes, they would make these newspapers in the, like as a promotional sort of advertising, updating parents kind of thing and send them directly out to parents. Mail -- mailing, it was a mailing for the parents.

25

Q. And I suggest that they were made available on campus where students would have access to them?

30

A. I don't ever recall them being something that was a big deal, or that, you know, were lying around and everybody reading them. All I recall, especially from a staff perspective, because I helped with a lot of mailings, they'd be -- they'd be published in the -- in the -- in administration and mailed out with the...

Q. All right.

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A. ...whatever the year end mailing was to parents.

Q. And I take it your parents would receive them like all the other parents?

5 A. I don't know if they made copies for the staff.

Q. So, these were mailed out and not a single copy was to be found lying around on the campus; is that your evidence?

10 A. No, that's not what I said. I said they weren't made a big deal where people were sitting around reading them. They were specifically made to promote the school to the parents and they were mailed out.

Q. Okay. And then they...

15 A. I'm not saying that I never saw them, but I just don't recall them being in -- a big...

Q. Okay.

A. ...part of life, for me, anyways.

20 Q. This one purports to be from December 1988, so that would have been in your final year of grade 13?

A. Yes.

Q. And it talks about an International Independent School's Public Speaking Tournament held in Montreal in October of that year?

25 A. Yes, I attended that and I also attended a light session from Judy James, as I outlined yesterday when I got back.

30 Q. And you were mentioned in this article. If you look at the last paragraph in the leftmost column as having achieved fifth place in interpretive reading?

A. Yes.

Q. Okay. And in -- at Tab 77 this is a list

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described as the GCC news, an excerpt from the GCC news from June 1989. This would have been at the time of your graduation from grade 13?

A. Yes.

5 Q. And there's a picture of you in the -- in the very top of this article "Students overcome fear of public speaking" and there's a picture of you saying "senior from Brockville"?

10 A. That's a picture of me with my short-permed hair.

Q. Ms. Granger why does everything have to be an attempt to advocate instead of just a simple answer to my question, is that you were not...

15 THE COURT: I couldn't hear you, attempt to what?

MR. BOGHOSIAN: To advocate.

THE COURT: Advocate.

MR. BOGHOSIAN: Q. Is that a picture of you or not?

A. Yes.

20 Q. All right. So, you're getting recognized for your performance in a public speaking competition; is that right?

A. Yes.

Q. Did you write this article?

25 A. Yes.

Q. You did write the article? And Ellen Wersvinski is that Matt's daught -- sister?

A. It is.

30 Q. Okay. So, you wrote this article and your picture's there, and you talk about how Becky and you both placed in the top ten of speakers in the -- in the rightmost column end of the first paragraph?

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A. Yes.

Q. So, you were allowed to write this article celebrating the success of -- of you and the rest of the public speaking team?

5 A. I was told to write this article.

Q. And it went out to all the parents of all the kids of the school at the time?

A. Yes.

10 Q. And it was available on campus to be read by the students?

A. That part I don't know for sure.

15 Q. If we can go to the next Tab 78 of the same exhibit. This is the full version, I believe of the Grenville College News for June, 1989. You'll see on page 9 at that tab is the same article we were just referring to. And if I can refer you to page 2, there's a reference you see in the big box on the left top half of the page, it says "Headmaster's List." Do you see that?

A. Yes.

20 Q. And this again is from June, 1989. That's grade 13, your year of graduation?

A. Yes.

Q. And it says:

25 The Headmaster's List, published annually has been established to recognize significant contribution to the total program of Grenville College School. Selection criteria included academic record, leadership role in school

30

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activities, character and
citizenship.

Do you see that?

5 A. Okay. Now, I understand what the
Headmaster's List is. I really didn't remember.

10 Q. You didn't remember, despite having gone to
the school from kindergarten to grade 13, teach -- working there
for another eight or nine years, you -- you didn't know what the
Headmaster's List was?

15 A. I could not remember and as I said, these --
these publications I don't recall them either. I mean, I knew
they existed, but that I would be on that list, probably,
because I had achieved prefect status by the end of the year and
I had high grade average, and I ran the junior dorm and I did a
lot of...

Q. Yeah.

20 A. ...of what -- what did they say? I had a
leadership role and I had a good academic record and I...

Q. All right.

A. ...was put on the list.

Q. All right. And under seniors you're --
you're listed there, sure enough. Do you see your name?

25 A. Yes, I just explained why I would have been
on that list. I mean, I -- I ran the junior dorm for the whole
year.

Q. And this was broadcast to all the world in
this -- in this newspaper; right?

A. To the world?

30 Q. Yeah.

A. You mean the parents of the students.

Q. And -- and -- and to all the students...

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A. Who were all over the world; yes.

Q. And all the students who cared to read the Grenville College News on campus?

5 A. I can't speak to whether it was available on campus. It was -- it was -- as you see, made in June, so that would have been during the summer, once they'd left. It was mailed straight out to parents as far as I remember.

10 Q. And if we can go to page 4 of the same document. There's a full page almost listing of commencement award winners for 1988, '89, the year of your graduation.

A. Yes.

Q. Do you see that?

A. Yeah.

15 Q. And you're listed as having won or co-won the Passmore prize?

A. Yes, the Passmore prize was given to a staff kids who -- where is it -- the staff kids that were graduating that year. Interestingly enough, that's the woman whose house I cleaned for and they would give the prize.

20 Q. The woman whose book you stole?

A. Yes.

Q. And so you're saying there were just two of you staff students graduating that year and you both won -- co-won the prize?

25 A. We both cleaned her house and she knew us well.

Q. Oh, I'm sorry the Passmore person is the -- the -- the person who -- who put up the prize?

A. Yes, she gave the money.

30 Q. I'm sorry. I see. She was the benefactor who donated money to the school?

A. Yes.

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Q. And you're suggesting that this was exclusively to staff kids?

A. Yes, because she had staff kids come clean her house.

5 Q. And then you also won the Josiah Henson award in history. Do you see that at the top, near the top of the rightmost column?

A. Yes.

10 Q. And this is being broadcast to everyone who received or cared to read on campus the GCC News?

A. Yes.

15 Q. And then on the next page, page 5, we have the second semester academic honour roll and there you are again listed as being congratulated for your outstanding academic achievement and do you see your name under the column OAC?

A. I see it.

Q. Okay. So, you were recognized for having assist -- attained honour roll in this publication?

20 A. In this publication and I believe that's the first time I knew about it. Well, I mean, like I said, I -- this was not something that I was really aware of. What I really cared about was having my name on the wall where everybody walked every day past the Keenan family lounge.

25 MR. BOGHOSIAN: Your Honour, this would be -- I don't know if this would be a convenient time...

THE COURT: Right -- right. Things have been quiet. Yes, why don't we take the afternoon break, take ten minutes.

30 R E C E S S

U P O N R E S U M I N G:

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MR. BOGHOSIAN: Q. Ms. Granger, you testified that you were forced to get your hair cut short and put in a perm when you were in grade 13, is that your evidence?

5 A. I think it was the -- the fall of grade 13.

Q. All right. And if I can have you look at your affidavit, paragraph 47. It's -- it's in this one, I think it's at the bottom. This is an affidavit you swore in support of the certification motion of this class action; is that correct?

10 A. I'm just looking. I -- I don't remember when this is from.

Q. Okay. Well, look at paragraph 67.

A. Sorry, when was this -- this from?

15 Q. Let's look at paragraph -- the -- the last page of the document, page 19.

A. Sorry -- sorry on the last page.

Q. You see there's a date 25 September 2010?

A. Okay. Thanks.

20 Q. All right. And 67:

I make this affidavit in support
of the motion to certify this
action as a class proceeding.

25 A. Okay.

Q. So, that's why you swore the affidavit?

A. Yes.

30 Q. If you look at paragraph 47, the bottom of page 12, you wrote:

Girls who were pretty or whom

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5 the staff seemed to fear would
attract attention were -- to
fear would attract attention
were especially targeted. I
recall those girls being told
they were sluts, whores and
jezebels. The prettiest girls
were required their hair cut
short and to make themselves
10 less attractive to boys.

All of this is in the third person about other
girls. It's odd, don't you think that you didn't mention
yourself as having to have your hair cut short and put in a perm
15 at grade -- in grade 13 or at any other time? You're talking
about other girls.

A. I forgot to mention that it happened to me.
I -- there was so much that I was trying to cover and it did
happen to me. I was recently, as I told you, trying to uncover
20 all the memories that happened to me that also happened to
others and yeah I didn't mention it there. There's photo
evidence though, so...

Q. Yeah -- yeah. We're going to talk a bit more
about your experience as a staff kid. Experiences like being
25 ripped away from your parents, being subjected to watching light
sessions where your own parents were torn down, being engaged in
your own light sessions, being sent to places like the Community
of Jesus, being woke -- woken up at 3 a.m. for light sessions.
I'm suggesting to you that those were things that were unique to
30 staff kids?

A. Having your parents yelled at and being sent
to the Community of Jesus as a discipline were unique to staff

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kids, just those two, but the other thing you said was the light sessions, being woken up in the middle of the night, those also happened to students.

5 Q. Well, you've already told us that you're not aware of that happening to anyone except yourself?

A. No, I said back in those testimonies that I couldn't recall names.

Q. Okay. Let's look at...

A. And I also said it was commonplace.

10 Q. ...let's look at your 2011 cross-examination transcript, page 36, question 179.

A. I'm sorry, page 36?

Q. Yes, the typed 36, yes.

15 QUESTION 179: That's okay. I'm going to say at the time of your experience, but I'm merely suggesting that first of all the things that we have discussed...

20 179: Yes.

...that were unique to staff kids, being ripped away from parents, being subjected to watching light session where their own parents were turned down -- torn down, being engaged in their own light sessions.

25 Yes.

Being sent to places like the Community of Jesus.

30 Yes.

Being woken up at 3 a.m. for

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light sessions. These things
that were unique to staff kids
were seriously harmful to you?
ANSWER: They were, I would not
argue that.

5

You gave those answers in your cross-examination
under oath in 2011?

A. I said they were harmful to me.

10

THE COURT: Hold on, I think you need to go a bit
further, because there's more about this being
awakened at 3 a.m., it looks like to me.

15

MR. BOGHOSIAN: Q. All right. Well, let's take
that -- that one away, but all the other things were unique to
staff kids; correct?

A. What -- what other things?

Q. All the other things that were listed other
than being woken up at 3:00 a.m. for light sessions.

20

A. I can't agree to that, because I don't
remember which exactly you're asking me to agree to.

25

Q. Let's go back and read -- you can read it to
yourself, everything from 179 -- question 179 down to the answer
to question 183. I'm suggesting that those things were all
unique to staff kids and they were all seriously harmful to you,
except the 3 a.m. awakenings for light sessions?

A. I would agree that they were harmful. I
would agree that some of them were unique to staff kids, but I
am still saying that the light sessions were not unique to staff
kids.

30

Q. Well, we already have your answer on that,
but being ripped away from your parents, being subject to
watching light sessions where your own parents were torn down,

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being sent to live in the Community of Jesus, those were all unique to staff kids; correct?

5 A. Only being sent to the Community and being subject to seeing your parents in light sessions, I would agree with those two things.

Q. Well, being ripped away from your parents as a small, young child?

A. Okay. As a small child, yes that was unique to staff kids.

10 Q. And generally you had in much worse than the non-staff kids, as there was no escape from a place over the summer, over long weekends and holidays; that fair?

A. Grenville was so abusive you didn't have to be there for very long to be abused. So you're suggesting that because I never got to leave I had it much worse? I guess if you're measuring intensity or to the extent to which I was privy to or abused, yes I was there a lot longer than students, but it didn't take long for a student to be exposed to the abuse, a non-staff kid.

20 Q. All right. Well, you can hardly speak for all 1350 members of the class can you?

A. Well, I was there for pretty much the...

Q. Well...

25 A. ...well I was there for the entire class and I saw students being regularly abused.

Q. All right.

A. It was normal to me.

30 Q. Well, I'm going to suggest to you that you experienced the full Grenville experience 24/7, 365 days a year; is that fair?

A. Yes.

Q. And in fact things were even worse over the

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summer months, because the staff and administration could focus so of -- solely on the behaviour of the 20 or so staff kids; is that true?

A. Yes.

5 Q. In the summer you could have one or two light sessions a week; right?

A. Yes.

10 Q. There were many more light sessions for you and the other staff kids over the summer and Christmas break than there were over the school year; true?

A. Do you mean in comparison to students or for myself?

15 Q. You have many more light sessions. You experienced more over the summer and Christmas breaks than you did during the regular school year?

A. Yes, it was more intense in the summers specifically.

Q. And over Christmas?

A. And -- yes.

20 Q. And you were known by all the non-staff kids as a staff kid; right?

A. Yes.

Q. And for that reason you had no other kids to confide in while you're at Grenville?

25 A. It was hard to make friends.

Q. Okay. And you felt very alone and isolated as a staff kid?

A. I did.

30 Q. And that was an aggravating factor in your mental suffering; wasn't it?

A. It was one of the many factors.

Q. It was an aggravating factor in your

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suffering?

A. It was one of the many factors.

Q. You had no close friends at all at Grenville;
did you?

5 A. Well, Grenville specialized in separating
students and separating friendships. That was not unique to --
to staff kids.

Q. What is the answer to my question?

A. I believe I just answered it.

10 Q. You gave a speech that didn't respond to my
question.

A. Should I repeat myself?

Q. No, that would just be giving the same
speech. I'm asking you, you had -- do you agree that you had no
15 close friends at Grenville; yes or no?

A. I had no close friends at Grenville.

Q. All right. So, when you said this woman from
Quebec who was denied the right to speak French was a close
friend of yours, that wasn't true was it?

20 A. She was in my class and since Grenville I've
been able to make friends.

Q. Yeah. Non-staff kids were referred to --
would refer to staff kids like you as "mind-fucked"?

25 A. Yes, I've learned that since I left
Grenville.

Q. And they didn't want anything to do with you?

A. I've also learned that -- well, I -- I
perceived that while I was at Grenville.

30 Q. Yeah and you'd never heard the term
"mind-fucked" to refer to staff kids while you were there?

A. No, sir, I learned that since I left.

Q. But you were very aware that the -- the --

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the "mind-fucked" tag, I suggest to you, was given because the non-staff students were very conscious of the far greater level of mind control and greater light sessions and greater discipline that you and the other staff kids had to endure compared to them?

5

A. I think so.

Q. And in terms of students confiding in one another, it was your observation that students did not confide in another about the discipline they received for example?

10

A. I've come to realize that we -- I've heard so many people tell me stories of -- of disciplines that were happening to them while I was there, and I would have walked up and down hallways, even other staff kids, and I had no idea what they were enduring, because we were isolated from each other in terms of not being able to speak when we were in trouble and not being able to trust each other.

15

Q. All right. Do you agree with me then that it was your observation at the time that none of the students confided in one another about any discipline they experienced?

20

A. At the time?

Q. Yes.

A. I don't know if I can say no one spoke to each other. It was definitely a difficult thing to confide in other people. As I said, it was really hard to trust others and you were often on silence disciplines.

25

Q. As a -- I think you've already answered this, but as a -- as a staff kid you were expected to be a role model for the non-staff kids?

A. Yes.

30

Q. And you were -- as a result you were subjected to a much greater degree of scrutiny and discipline compared to the non-staff kids?

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A. That -- yes.

Q. And you were personally targeted from a very young age for being rebellious and having a bad attitude?

A. Yes.

5 Q. And so you got it worse in terms of light sessions and discipline than even the typical staff kid; correct?

A. I wouldn't say that. I -- I did get worse than some of my fellow staff kid friends.

10 Q. You got -- got it worse than most in your -- your view than the rest of the staff kids?

A. I have -- I have felt that way most of -- most of my life, and what I just said to you is because I talked to many staff kids in the last few years and was shocked by what they told me they went through and I had no idea, previous to, you know, a few years -- within the last few years.

15 Q. And one of the reasons the non-staff kids steered clear of staff kids like you, it was because they saw the way you as a staff kids were treated and they wanted to steer clear of any association with that?

A. I'm not sure if it was because -- I think that -- I thought they wanted to steer clear because they couldn't trust staff kids, because we were told to spy and -- spy on people and turn people in.

25 Q. If I can have you refer to your examination for discovery transcript on page 27.

A. Can -- is that -- what's on the corner of it?

Q. The discovery transcript.

A. What's on the corner?

30 Q. And so 124. All right. And it says:

And you were Hale-Byrne friend

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-- were you and Hale-Byrne
friends?

ANSWER: To some extent. We
were in the choir together. It
5 was really hard to be a friend
to anyone when you were a staff
kid, because people distrusted
you. I saw the way we often
10 treat -- we were often treated
and that was often traumatizing
so they steered clear.

That's the answer you gave on your discovery in
2015?

15 A. Yes. I don't -- I couldn't find it, but
yeah, that sounds right.

Q. Page 27, but you heard what I read out?

A. Yeah.

20 Q. And you experienced far more as you called it
mind control, brain washing and targeting as a staff member than
you ever did as a student. That's a fair statement; isn't it?

A. It's hard to agree with that or disagree with
that. I -- I -- I -- I'm gathering you're reading that from one
25 of my testimonies. Looking back at it now, it was a
continuation of the mind control. It was really intense as we
know in -- in my early twenties -- mid-twenties, but...

30 Q. Let's -- let's look at the cross-examination
transcript from 2008, page 194. This is discussing your time as
a staff member and -- and I think you'll list the -- the year
that you were moved to three different apartments as a staff
member. I'm reading from question 963 and then at 964, you were
asked:

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Why were we -- why were we
moving?

ANSWER: Because Farnsworth's
were constantly calling meetings
and moving staff around.

And why?

Well, because they wanted to
keep people out of control and I
actually experienced more mind
control and more brain washing,
more targeting as a staff member
than I did as a student.

Do you recall giving that answer?

A. I do now.

Q. And you adopt it here today?

A. Again, I mean I said that in 2008 when I was
just coming out of my -- I had just left a few years ago and I
didn't understand everything the way I do now. And yes it was
terrible as a staff, but it was also terrible as a student.

Q. All right. And you blurted this out
spontaneously. This wasn't even in answer to a direct question.
You added that yourself to the end of an answer to a different
question; correct?

A. I stand that -- what I just said.

Q. You stand by the fact that this answer was
accurate at the time you gave it in 2008?

A. In 2008, yes.

Q. So, with respect to weight issues and eating
disorders, I'm going to suggest that as early as five years old,
when you were five years old you were identified as being

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overweight?

A. Yes.

Q. And for the rest of your childhood you were
put on a series of special diets and exercise regimes to control
5 your weight?

A. It was to control my weight and my sin.

Q. And that was imposed by the Community?

A. It was imposed by the leaders at Grenville.

Q. Yeah. This wasn't a school related diet
10 regime. This was you as a part of the Community that was put --
being put on these diets?

A. It was just another form of discipline that
was coming down from the Farnsworth's and the Haig's, when I was
little, but those were the people in charge. I was well aware
15 it wasn't from my parents.

Q. And that wasn't something that a non-staff
student would have to go through; was it?

A. When I was in my teens, I was not alone in
that kind of targeting. And when I say not alone I'm -- I'm
20 aware of other non-staff kid students who were either put on
diets or force fed because of their vanity.

Q. Force fed or required to eat all the food on
my plate, there's a big difference. Force fed is you're held
down and someone's shoving food in your mouth. Is that what
25 you're trying to explain to the Court...

A. They did not...

Q. ...that people were physically held down and
food was shoved in their face?

A. No, I didn't say that.

Q. Yeah, that's what force fed means.
30

A. Okay. So, they were forced to sit at the
table until they ate all the food and it -- even if it took

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right through recess or right through, you know, an hour after -- after a meal.

Q. So, they were required to eat all the food that was put down in front of them before they could leave?

5 A. Yes, but a lot of -- yes, and in many cases it wasn't -- the food that that child or student wanted to be eating or felt that they should be eating.

Q. And how do you think you're in a position to speak for these people?

10 A. I'm speaking my truth, and I also...

Q. But I would like you to stick to what you know.

A. Okay.

15 Q. Do you really understand what was in the heads of these students who were made to sit there until they finished their food?

THE COURT: Well, I think...

MR. BOGHOSIAN: Sorry.

THE COURT: No, it's okay.

20 MARGARET GRANGER: I only know that the -- that that's what happened to me, and what I've -- what I know to be true about other people.

25 MR. BOGHOSIAN: Q. Well, what you know to be true to other people, how do you have this information about how the other people were thinking about why they weren't eating that food?

A. Well, it's -- as a representative plaintiff people have been telling me their stories, so I'm not -- I -- and it really helps me to know that I'm not alone.

30 Q. Okay. So, this is based on all long after the fact hearsay that you're basing this on?

A. I'm not basing it on -- okay. I'm telling

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you the truth about my story.

Q. I'm asking you about how you know why these other students would not eat all their food or didn't want to; how do you know that?

5 A. Because they told me they were put on diets or they were...

Q. Told back then or...

A. ...told to eat more.

Q. In the context of this litigation?

10 A. I don't understand the question.

Q. I said were you told that back at the time by these people, or have you just been told since the litigation arose?

A. In the last 12 years.

15 Q. So, that's since the litigation arose?

A. Yes.

Q. And your discussions with these other class members have got -- actually gotten down to the minutiae of their rationale for not wanting to eat all their food?

20 A. No, I told you what it was. It was they were told to eat more because they were too vain or they were told to eat less because they were too gluttonous.

Q. But I -- I'm trying to understand how this conversation came around with these other class members in the last 12 years that you now know what their rationale was for not wanting to eat everything on their plate on any given evening.

A. We were talking about diets.

Q. I see.

A. And how...

30 Q. So, other...

A. ...the Community of Jesus from Grenville used to impose them upon people.

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Q. So, that's something people have told you in the last 12 years since this litigation arose?

A. Yes, it's very -- it's very validating when you find other people's stories that...

5 Q. And that's...

A. ...line up with yours.

Q. ...not something that you realized or appreciated at the time?

A. At the time I felt very isolated.

10 Q. Okay. So, at the time you weren't aware of other people being put on other diets?

A. Well, at -- my mother was put on a -- on an eating diet.

Q. Other students, please other students.

15 A. Other students? I mean, I witness -- your -- it was typical for students to be required to eat everything on their plate, but to me that wasn't what we're talking about here.

Q. Yes and I've asked you -- I am suggesting to you that you were not aware at the time of any other student being put on a special diet who was not a staff kid; isn't that fair?

A. At the time, I don't recall.

25 Q. And you were also required to go on special diets with the other staff; is that fair?

A. Yes.

Q. Including one in which you had to eat swordfish for breakfast?

A. Yes.

30 Q. And you'd eat these special diets in the dining hall with all the other kids?

A. Yes.

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Q. And the other -- the non-staff kids did not have to eat these special diets?

A. Correct.

5 Q. And you felt embarrassed and humiliated in having to eat these odd foods in front of all the non-staff kids?

A. Yes.

Q. And staff had to go on grape fasts for 40 days several years in a row?

10 A. Yes.

Q. But you didn't have to do that fast, because you weren't staff at the time?

A. Correct.

15 Q. And certainly no non-staff kids ever had to participate in a grape fast or a grape diet; right?

A. Right.

THE COURT: What is -- what are you calling it a grape?

MR. BOGHOSIAN: Q. Grape fast.

20 A. The staff had to eat only grapes for the entire Lent for 40 days. That was imposed by the Community of Jesus.

25 Q. And we've established that, Ms. Granger as a staff kid did not have to participate in that. Excuse me, Your Honour. And that certainly no non-staff kid had to participate in that grape fast. And you were fired from your job at Grenville in 1993 by Father Farnsworth due to your bulimia?

A. Yes.

30 Q. And you had to work for free for six months at that time until you were re-hired?

A. Yes.

Q. And this was clearly experienced as a staff

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person, not as a student?

A. Yes.

Q. And I'm suggesting to you that being ripped away from your parents to live with other families as a young child, repeatedly being moved from home to home, sent to the Community of Jesus for six months for rehabilitation and having to observe your parents undergo light sessions where they were berated, these were special acute sources of trauma that were not experienced by the non-staff kids were they?

5

A. Yes.

Q. And they were all seriously harmful to you weren't they?

10

A. Yes.

Q. And I'm suggesting it's difficult if not impossible for you to separate out your experiences as a student from those as a Community member and later staff member is it?

15

A. Sorry, I...

Q. It's difficult if not impossible for you to separate out the impacts of your experiences as a student compared to those you suffered as a Community member and a staff member?

20

A. It's difficult to separate the impact, because yeah I -- I -- they're all intertwined.

Q. All right. And I'm suggesting to you -- you mentioned about letters and they're all censored and I'm going to suggest to that certainly not all outgoing letters were reviewed and or censored?

25

A. I can't speak to that. I didn't actually censor them myself, so I don't know how they were censored.

30

Q. Did you not testify in-chief that the -- the letters were -- were all reviewed before they went out and -- and if in -- in -- inappropriate they would be censored?

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A. Can you remind me of what I said, I don't recall.

5 Q. All right. Well, I'm asking you to agree that certainly not all outgoing letters were reviewed and or censored. There would only be cert -- certain students whose letters might be reviewed and censored?

A. I -- I -- all I know is that students were required to write positive letters to their parents and if they were not positive then they had to rewrite them.

10 Q. Okay.

A. Over the years I've tried to recall the actual details of what I saw or witnessed with the -- with regards to the letters and how the staff actually handled them. And it's just I can't remember the specifics seeing an actual letter being writ -- read in front of a student or aside from 15 the students. It was just common knowledge that you better write a positive letter or you'd have to rewrite it.

20 Q. All right. And I'm suggesting there was never a wholesale review and censorship of outgoing letter to anybody?

A. I don't...

Q. At any time?

A. ...know how to answer that. I just told you.

Q. Answer it truthfully.

25 A. But I just did answer that, did I not?

THE COURT: I think that answer was asked. It sounds like the same question.

30 MR. BOGHOSIAN: Q. Well, I want to give her one more opportunity before I take her to the transcript and I'm suggesting to you that it was not the case that letters were routinely, automatically reviewed before they went out be it to parents or anybody else. Do you agree with that?

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A. I -- I don't -- all I know is that students had to rewrite letters on occasion, so I don't know how many letters were writ -- read or how often it was done, but I know for a fact that letters had to be rewritten on occasion.

5

Q. If I could take you to the 2011 cross-examination transcript. It says "CX11" on the top right corner on the front. Page 74, question 367:

10

Now, when it comes to letter writing, students were encouraged to write to their parents?

ANSWER: Correct.

15

In fact, for a while it was mandatory; right?

Yes.

20

Now, on occasion students had to hand in what they'd written if it was suspected that they weren't writing anything at all?

That was my impression, yes.

Yes, other than that their letters went uncensored; correct?

25

I talked to some people who that did not happen with and also for myself, my...

Well, you weren't writing to your parents.

30

Okay.

So, for talking about letters going out just to parents, yes?

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There were times -- well, I talked to a couple of people that had to show their letters to have them approved, let's say before they were sealed.

5

You gave those answers in 2011 under oath?

A. Yes.

Q. And so you're -- the extent of your knowledge of censorship of letters was talking to a couple of people?

10

A. I'm just reading on, because I -- it -- it keeps going the conversation. Because I didn't actually agree with that, I kept saying -- I said...

Q. The sum to...

15

A. ...that kind of thing was an unwritten rule.

Q. Yeah, the sum total of your knowledge is talking to a couple of people who had to show their letters, I'm suggesting to have them approved before they were sent out?

20

A. No, that's not the sum total. That's what I mentioned there as an example, but we were -- we were told that we had to write positive letters. They would make skits about it. They would actually have skits where they were acting out how kids should talk to their parents when they went home on break.

25

Q. Skits, like what do you -- what are you...

A. Like the staff...

Q. ...talking about skits?

30

A. ...would act out skits, like they'd act out -- pretend to be Ghostbusters and do some -- some kind of Ghostbusters skit, or they'd get up there and pretend to be the, like a man would pretend to be the mom and another man would pretend to be the dad and they tried to get -- make things light

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with some of the roles, and...

Q. This...

A. ...that was a skit. I recall where they had to be -- they were told how to be positive with their parents and they had -- I remember they had the parent reading a letter and it had complaints in it, and Father Farnsworth was basically making fun of the fact that if you were complaining, then -- he basically preached about that. But yeah, I just recall skits where they would make fun of the -- of children who were trying to complain to their parents.

Q. Okay. Well, let's -- let's just put this together. Where are these skits being put on at?

A. In the dining room on the stage.

Q. Okay. On what occasion?

A. They were a regular occurrence. Usually near the beginning of the year when they're trying to acclimatize the kids to the roles.

Q. So, the -- this is a jocular, fun sort of event?

A. Yeah.

Q. All right. And you're saying that staff were on stage making fun of the fact that letters to parents had to be positive, is that what you're trying to say?

A. No, communication with parents and specifically when they got home, how they were to communicate to the parents about how life was at Grenville.

Q. And this was all joking, in a...

A. Well...

Q. ...in a hah-hah funny skit kind of fashion?

A. ...it was a -- a message, but it was trying to make light of the message.

Q. All right. So, they were joking about this

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as part of a variety show?

A. I -- I guess so.

Q. All right. And also in this variety show you said that staff would cross-dress?

5

A. Yeah.

Q. Okay. And that was all cool at Grenville at the time?

A. I don't know about cool, it was funny.

10

Q. Okay. So, there they -- there they were, the male -- male staff members on stage, dressed in drag, and...

A. No, he had a wig on...

Q. I see.

A. With an apron or something...

Q. Oh.

15

A. ...dress.

Q. I see. A man dressed up as a female and this was part of the skit that was put on...

A. Yes.

Q. ...at these variety shows...

20

A. Yes.

Q. ...that occasionally happened from time to time at Grenville?

A. Yes.

25

Q. And Father Farnsworth would be there for all this?

A. Yes.

Q. And in one skit they were making fun of ha-ha you better write positive things back to your parents about the school?

30

A. Well, the whole message was that you had to not complain about life at Grenville.

Q. All delivered in a joking fashion?

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A. Yes.

Q. So, Father Farnsworth retired in 1997?

A. Yes.

5 Q. And on your view you've made it very clear he
was a tyrant?

A. Yes.

Q. He was horrible?

10 A. He could be. He was -- he -- well, part of
the reason he was -- I was afraid of him is you just never knew.
Sometimes he'd be joking with people and very charming and kind
of get them into his confidence and then other times he was
extremely frightening.

Q. And he -- and -- and you say he left in '97?

A. Yes.

15 Q. And after he left immediately things got so
much better at Grenville; right?

A. Well, they -- they took a good look at all
the policies and they made a lot of changes.

Q. Immediate changes?

20 A. For the better. No, I don't think it was
immediate. It might have been -- it took a couple of years.

Q. And in spite of the fact that Farnsworth, the
tyrant left in '97, you still chose to leave the very next year
to live off campus; right?

25 A. It wouldn't be in spite of the fact.

Q. I'm just saying in spite of the fact, that's
a fact that he left in '97. You chose to leave the school in
1998...

A. It was...

30 Q. ...due to unhappiness?

A. ...actually not in spite of the fact, it was
because of the fact. Because he left, I actually had the -- the

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-- the courage and the ability to ask -- to make that request.

Q. Okay. And -- and things were clearly -- it's fair to say that only a small handful of the staff meted out discipline at Grenville?

5 THE COURT: Did you say beefed out?

MR. BOGHOSIAN: Meted out.

THE COURT: Okay.

MR. BOGHOSIAN: Q. Gave out discipline, administered discipline?

10 A. The worst -- the most sever disciplines were meted out by the A-team. Well, especially Father Farnsworth, but -- and especially Father Farnsworth and the deans.

Q. All right.

15 A. But other staff would correct students on a daily basis.

Q. I'm suggesting that 75 percent of staff were never involved in disciplining or light sessions; is that right?

20 A. That could be -- that -- yeah. I would say the teachers and the -- all the maintenance staff they'd basically did their jobs as you would expect a staff member to do in the -- in the school, although they were -- they -- they did correct students on a regular basis, but it wasn't meting out discipline, as you said.

25 Q. And the teachers would rarely administer discipline unless they witness something egregious?

30 A. Right. And I don't think teachers, except for the A-team ever disciplined a student until they'd taken that student to the deans if they saw something egregious. They wouldn't choose the discipline for them they would take them to the deans.

Q. And other than members of the A-team, teachers were rarely confrontational or intimidating, if at all;

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is that a fair statement?

5 A. No. They were -- there was -- especially some of the dorm supervisors, who were like assistant deans, they -- they would be confrontational. Any -- any staff who worked in the actual dorms...

Q. I used the word teachers.

A. ...were often, but...

10 Q. Other than -- if they were a member of the A-team...

A. Okay, sir...

Q. ...the teachers...

A. ...we're getting confused, because there -- a lot of teachers were also dorm supervisors or assistant deans.

Q. Yes?

15 THE COURT: So, which are you asking her?

MR. BOGHOSIAN: Q. Well, dorm supervisors certainly did not mete out discipline, they would alert the deans and they would decide about discipline; right?

20 A. The deans were the ones who chose what disciplines would take place.

Q. So -- so the answer to my question when I asked, dorm supervisors did not administer discipline, they would bring it to the attention of the deans and the deans would decide. The answer to that, I take it is yes?

25 A. As far as I saw it, yes, as far as I witnessed it.

Q. And light sessions were strictly an A-team thing; correct?

30 A. No, a staff could correct a student at any time. So, it depend on, you know, if -- you could have your minor light sessions where a staff was correcting a student for any number of things and that was not a -- a -- an issue that

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was brought to the deans.

Q. And -- and a light session could be as simple as a talking to, a warning don't do that again; right?

A. No, that would not be a light session.

5 Q. All right. Am I correct, Ms. Granger that there was a decided difference between the Haig years and the Farnsworth years at Grenville?

10 A. I thought there was, and I'm pretty sure that I -- I have attested to that, because when Father -- let me -- things were not great under Haig, believe me, but things got more intense and more bizarre as Farnsworth took the reins and moved through the years from the early eighties to the late nineties. Things progressed for the worst -- for the worse.

15 Q. Well, have you not testified before that the environment was so much more destructive at the end of the eighties and into the earlier nineties than in any other period?

A. I think that's what I was just saying.

Q. All right. And you -- you adopt that?

A. Yes.

20 Q. Discipline was far more degrading in the Farns -- in the -- that period of time?

A. From what I observed, yes.

25 Q. Yet, when you were a staff member for those nine years, I'm suggesting that you were never told or instructed to rat out students that you perceived to be sinning or breaking school rules. You were never explicitly told that?

A. That was part of my job.

30 Q. You were never explicitly directed or instructed by those above you to do that, to rat out students who you perceived to be sinning or breaking school rules?

A. Breaking school rules was one of the -- the supervisor's job to figure out what was happening all around us

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and as far as sinning goes. I observed a lot of dorm supervisors correcting girls for their...

Q. But you were never...

5 A. ...their infractions and so yeah, I understood that to be part of my job. I also tried not to do it, but I -- I understood it to be what I was expected to do.

10 Q. I -- you -- you may have had that expectation or belief, but you were never explicitly instructed or told to rat out students who you perceived to be sinning or breaking school rules; correct?

A. I -- I don't agree with that.

Q. And you were always left to your own judgment regarding what breaches of rules on the part of students you would report up the chain?

15 A. Left to my own judgment?

Q. Yes.

20 A. Well, I don't think that was told to me. If that -- if I actually used my own judgment, whether or not I was going to say something, but I don't think we were told it's up to your judgment.

Q. All right. And you were never instructed by Father Farnsworth or any other administrator while you were a staff member from 1990 to 1998 to humiliate or shame students; were you?

25 A. I had just lived for 20 years at the Grenville Christian College campus, so it was very clear to me that shaming students for their perceived wrong doings was something that was a regular occurrence and that staff were expected to do.

30 Q. And I'm suggesting to you that Farnsworth never instructed you or others in a staff meeting that you were present at to humiliate or shame students; is that fair?

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A. No, sir.

Q. You were instructed by Father Farnsworth to shame and humiliate students; is that what you're saying?

5 A. I -- I -- I'm -- you asked me -- you said we were not told that and I said that's not true.

MR. BOGHOSIAN: Okay. If we can look at your discovery transcript -- Your Honour, I'm not going to finish today and I think this will be my last point for the day, if that's all right?

10 THE COURT: How much longer do you think you'll be?

MR. BOGHOSIAN: I need to check I think probably about 20 minutes to half an hour.

THE COURT: All right. What's the reference?

15 MR. BOGHOSIAN: Page 79 of the document with the ED in the top right corner.

THE COURT: Which number?

MR. BOGHOSIAN: Q. Page 79, question 273 at the bottom.

20 A. I -- I'm sorry, I...

Q. It's ED at the top.

A. Yeah, what page?

Q. 79.

A. Oh I -- I misheard you.

25 Q. 273 at the bottom.

30 And did Farnsworth ever instruct you and or others in a staff meeting that you were present at, for example that they were to humiliate and shame people? You mean tell me to do that to

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other people?

Yes.

ANSWER: No, I just witnessed it
being done.

5

Did you give that answer in response to that
question?

A. Yeah, I -- I witnessed it being done and
that's how I learned what was expected and what to expect.

10

Q. My question was did -- were you ever
instructed to do that and the answer was no; correct?

15

A. Well, not explicitly. I don't think we were
-- we were told you need to be shaming students. It was just
I'd learned that over the course of two decades. I also learned
that I didn't want to do that to anybody, because I know how it
felt to receive it.

Q. So, you tended no to enforce the rules very
strictly?

20

A. I tended not to humiliate and shame people.

MR. BOGHOSIAN: Your Honour, this would be a
convenient point to break.

25

THE COURT: All right. Ms. Granger, you're on
cross-examination still, overnight so please
don't discuss your evidence with anyone and
please come back tomorrow at 10 a.m. Thank you.

...MATTER ADJOURNED TO SEPTEMBER 25, 2019

30

M. Granger - Cr-Ex.
(Mr. Boghosian)

WEDNESDAY, SEPTEMBER 25, 2019

U P O N R E S U M I N G:

5 MARGARET GRANGER: PREVIOUSLY SWORN

CROSS-EXAMINATION BY MR. BOGHOSIAN:

Q. Good morning, Ms. Granger.

A. Good morning.

10 Q. Ms. Granger, would you agree with me that the actual academic teaching at Grenville was top-notch?

A. That's how I perceived it.

15 Q. Okay. And there were many varied extra curricular activities involving both sports and the arts for students to engage in?

A. Yes, there were lots of activities.

Q. And there was wide-spread, almost universal participation in extra curricular activities?

A. There was wide-spread participation.

20 Q. You, for example, were in the orchestra in your senior years?

A. Yes.

Q. You bowled?

A. I'm sorry?

25 Q. Did you bowl?

A. Bowl? No.

Q. Bowl. Oh, you didn't bowl. Did you ski?

A. I did.

Q. Did you do track and field?

30 A. Yes.

Q. Did you participate in volleyball?

A. No.

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Q. We know you did public speaking; you were on the public speaking and debating team.

5 A. There wasn't a public speaking team. They would pick you if you did well from the - your class and then you would be picked to go to the public speaking tournament - not - not tournament, public speaking competition in front of the school, and then if you did well there they might pick you to go to the odd competition.

10 Q. And you went to such competitions with other schools, to Montreal, for example?

A. I went twice, as I can recall. One to Montreal and one to New York.

Q. New York City?

15 A. No, it was a - a college in upper state New York - up state New York.

Q. Okay. And we heard about a trip to Europe that you went on? I know it was as a staff, but there were - were there trips for students to Europe?

20 A. That was one trip that - I think there was only one trip of its kind like that and I was a supervisor on that trip.

Q. Where there....

A. It was around 1995 or so.

Q. How many?

25 A. 1995 is when I went.

Q. Oh, how many kids went on that trip?

A. About 12.

Q. And were there ski trips, as well, to ski resorts?

30 A. The - for - when I was in high school, for a few years they did offer us ski trips. You could sign up and if you were in good standing you could get permission to go. I

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mean in good standing with the deans.

Q. The school's athletic teams and individual sports athletes routinely won championships and competitions against other schools?

5 A. I don't know about routinely.

Q. They did win championships and they did well competitively against other schools?

10 A. That was - that's not - that's not completely accurate, because we actually struggled a lot with our sports teams because students would come and go so often and you couldn't be sure if you were going to have a strong sports team in any given year.

15 Q. And you'll agree with me, Ms. Granger, that at least some student who attended Grenville would have left it with a positive perception of the place?

A. I have heard of some people who had left with a positive perception.

Q. Many children who attended would never have experienced the light session or any serious discipline?

20 A. No, everyone who was there as a boarding student saw the light sessions that were mass light sessions with the full school which, as we've discussed, happened anywhere from two to around five times a year and they would have seen and been exposed to the preaching, the indoctrination and they would have seen students being shunned and put on discipline. They would have experienced all kinds of the tactics that were passed onto us through the (indiscernible) and then Farnsworth.

25 Q. There were even staff kids who were never stood up in front of the entire student body or ever experienced anything but the lightest of discipline, isn't that right?

30 A. No, I would not agree with that. I would say

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that some staff kids didn't get stood up in front of the school. That, I agree with, but every staff kid had routinely experienced light sessions and their own kinds of disciplines.

5 Q. All right. If I can refer you to your examination for discovery transcript. It has ED on the top right concern.

10 At question 187: And what did you have to do to figure out how to get along without being targeted, other than obey the rules?

15 ANSWER: I never figured that out. I tried, because I'm a pretty smart person, and I really did try to - I was paranoid to try to figure out, like, do everything right, but sometimes I'm coming to learn
20 that, you know, people's personalities are very different. Some people have a much more placid kind of easy-going. I had friends who
25 were also staff kids who were never stood up in front of the school, you know, they only got targeted for minor infractions and they don't feel that they
30 were abused like I know I was. So, it really depended on people's situations or their

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personalities, and if they have
the ability to think outside of
- I don't now what I'm trying to
say, like, if they have the
ability to think for themselves
or question things.

5

Do you remember giving those answers under
cross-exam - your examination for discovery in 2015?

10

A. Yes, I - I believe that's exactly what I was
just trying to say.

Q. All right. So, you adopt that answer?

A. I adopt that they were - many of them were
not stood up....

15

Q. You adopt this answer?

A. I'm going....

Q. Please answer my question.

THE COURT: Please don't speak at the same time.

MR. BOGHOSIAN: Sorry.

20

MR. BOGHOSIAN: Q. I - Ms. Granger, it's
important for you to answer my question and not give speeches
every time you respond to a question. Do you adopt this answer;
yes or no?

25

A. I do adopt that I said exactly what I said to
you just minutes ago that they were never targeted in front of
the whole school, some of them, and some of them were targeted
for minor infractions. And I do have some friends who were
staff kids, even now, who don't feel they were abused as much as
I was.

30

Q. All right. Do you adopt this answer that I
just read out?

A. Yes.

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Q. And I suggest to you that perhaps a third of all of the staff kids you attended high school with never faced - were never targeted by the school for discipline or light sessions?

5 A. Sorry, how many?

Q. One-third of staff kids you attended high school with would never targeted for light sessions or discipline.

10 A. No. For light sessions? We were all in light sessions all through our lives there.

Q. At least a third - a third or so of the students would never have been targets of the staff for discipline?

A. Of the students or the staff students?

15 Q. Staff kids that you attended high school with.

A. No.

20 Q. Okay. Can I take you to your cross-examination transcript from 2008. CX08 in the top right corner. Question 231, page 46, "How often are you the target of the discussion," and this is the discussion about staff kid lunches that were held weekly. Do you see that in question 230 and before?

A. Yes.

25 Q. (Reading):

How often are you the target of the discussion?

30 Often you would, on a typical lunch, maybe four people would get targeted or five and you would hope to god it wasn't you.

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5 But - so, for me, I was often -
often - I mean, it would be a
good day if I wasn't spoken to
and I usually had, I would say,
10 in that group of 10 to 15, I
think it would be fair to say
that about a third of them were
really well behaved, really well
mannered, had figured out how to
15 get away with not being a
target.

Do you remember giving that answer on your
cross-examination in 2008?

15 A. I do recall that, but what I'm saying that
is...

MS. LOMBARDI: Your Honour, sorry to interrupt, I
don't believe the question my friend is putting
to the witness is entirely fair. The transcript
20 clearly is talking about lunch sessions and he is
extrapolating what is said here to apply simply
more broadly than specifically those lunch
sessions.

MR. BOGHOSIAN: Your Honour, this is
25 cross-examination. I haven't even put the
question to her. I acknowledge that it's
referring to the weekly staff kid lunch sessions.
THE COURT: Okay. Let's just break it down one
step at a time. Your answer started to
30 anticipate a question. You were just being asked
if you remembered giving that answer. So, if you
take counsel's question one step at a time and

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then if there's an objection, I'll be able to rule on it more easily.

A. Okay.

5 THE COURT: So, if you can listen to the question, answer what you're asked and then I'll just ask counsel to take it step-wise and we'll see where we go from there.

10 MR. BOGHOSIAN: Q. All right. Do you remember giving that answer in 2008 regarding the weekly staff kid lunch sessions?

A. Well, the thing is, it was 11 years ago. I don't remember saying that, but I read it here, so....

Q. Okay. And it was the truth as far as you recalled it at the time?

15 A. Well, what I was trying to say was that in any given - any given meeting, a third of them would not be targeted at any given meeting, but I said you never knew who was going to be targeted. And then I did say that some of us were targeted more than others because of their personalities and the way they had learned to, sort of, fly under the radar.

20 Q. So, generally speaking, there were staff kids that were not - did not find themselves to be targets of light sessions or discipline, is that fair?

25 A. There were no staff kids that were not involved in light sessions.

Q. The - the fair reading, I'm suggesting, of your answer to question 231 on page 46 is that a third of the staff kids were never targeted at these weekly staff kid luncheons.

30 A. No, I did not say that. I said a third of them were well behaved and had figured out how to get away with not being a target.

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Q. Okay. And those kids certainly wouldn't consider Grenville to be an abusive place, would they?

5 A. At the time of 2008, I had cut off all ties with every staff kid that I knew. I couldn't trust them and I had no idea where they stood.

Q. It all depending on one's personal experience whether you had a positive or negative view of Grenville, isn't that fair?

10 A. They were subjected to light sessions for decades, so I assumed that they had also felt abused. Whether or not they realized it, I don't know, and as I said, I couldn't trust anyone so I was not in communication with them to find out what they felt at the time.

15 Q. The truth is that you had no idea of the extent of the suffering going on around you that is now being alleged by some students while you were at the school.

20 A. While I was at the school, I was unaware of the extent to which people were suffering because people suffered in isolation. I know that for myself and I've come to know that by talking to countless people since 2007 when the school closed.

Q. Well, you have been on - active on a - you were active in the 2006, 2007, 2008 period on a face - on a website called FactNet?

25 A. I found FactNet the summer of 2007 when the school closed.

Q. And....

30 A. I read it for a few weeks. I found it to be extremely triggering and didn't have time to pour over it for months and months after. But I definitely read it and it was eye-opening. I couldn't believe that I was reading what I was reading and I couldn't even - I didn't have the foggiest clue

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that students were so damaged by Grenville. I knew that people were unhappy being on discipline. I knew that they didn't like a lot of what took place there, but I had no idea the extent to which people were damaged until then and I am still learning that now.

5

Q. And - and this is all based on you - you spent three days at one point reading stories posted on the FactNet site about so-called alleged abuses at the school, right?

10

A. Yeah, a three-day - yeah, my - my baby was about six months old and I tried to get on FactNet for as much as I could being a - a mother of a baby.

Q. And there are Facebook sites, private group sites that you and other Grenville alumni frequently post on?

15

A. Yes.

Q. And you've read stories of alleged abuse at Grenville by reading those websites, haven't you?

A. Yes.

20

Q. And since first seeing FactNet in 2007, you've spoken to - you said in 2011, 10 to 20 people who had stories of abuse at the school?

A. Yes.

25

Q. And in pouring over the FactNet stories and the Facebook Grenville site stories, I suggest that you've become embolden by these to perhaps recall more light sessions and discipline involving non-staff students than you have actual first-hand knowledge of.

A. I disagree.

30

Q. Well, you already said you had no idea of the extent of suffering going on at the school around you when you were there.

A. In 2008 when this first got started, I had

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very little understanding of the extent to which I was abused and the people that I grew up with were abused and the students who were abused. And it has taken a lot of therapy and a lot of work on my part to even be able to cope with the kinds of damages that happened to me and to be able to come up with an understanding of what was happening all around me.

Q. Well, your understanding about what was happening around you is all from accounts that are being given on these FactNet and Facebook sites 20, 30 years after the fact, aren't they?

A. No, it's from my own recollection of my own abuse. And I have a great deal of knowledge of other people's stories, yes, but that doesn't change what I went through.

Q. Your knowledge of those stories are strictly from reading FactNet and Facebook 20 and 30 years after the fact, correct?

A. No, it's not strictly from that. I've had face to face meetings, I've...

Q. Okay.

A. ...called people.

Q. All of them....

A. People have called me.

Q. All of them are 20 and 30 years after the fact, correct? You didn't know any of this was going on around you at the time?

A. I knew what I saw and what I testified to for certain. I didn't know the impact...

Q. No, I'm suggesting....

A. ...until the last - say, since 2007.

Q. I'm suggesting that very few, if any, students confided in you about light sessions or discipline that they endured while you were at the school.

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A. While...

THE COURT: Sorry, I couldn't hear the question.
Can you say the question again?

5 MR. BOGHOSIAN: Q. I'm - I'm suggesting that
while you were at Grenville, very few, if any students, would
have confided in you about light sessions or discipline they
received.

10 A. While I was at Grenville, people did not
confide in me, students did not confide in me. People did not
trust staff kids.

Q. Now, as a representative plaintiff and a
member of the class action steering committee, you've had access
to the evidence of all the class members who have come forward,
right?

15 A. I don't - I don't know that that's true.

Q. Well, something in the order of 150 former
students came forward and they put down alleged abuses that they
suffered at the school, yes?

20 A. You mean they wrote their testimonies and
sent them to the lawyers?

Q. The synopsis.

A. Is that what you're talking about?

Q. Yes.

25 A. I have not seen - I have not see any of
those.

Q. You've never seen any of them?

A. None, except I've spoken with representative
plaintiffs, we - there are only four of us - well, there were
four of us.

30 Q. And - and you conferred with some of these
class members who were going to testify about their evidence?

A. No.

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Q. You've conferred - conferred with them to get your stories straight?

A. I don't know what you're talking about.

5 Q. Well, for example, there's hundreds of pages of testimony that you've given in this case, right?

A. Yes.

Q. Affidavit 2010, cross-examination in 2008, cross-examination in 2011.

A. Yes, and those only scratch...

10 Q. Can I...

A. ...the surface.

Q. ...can I please finish? Your examination for discovery in 2015.

A. Yes.

15 Q. And you were taken extensively through all of your experiences at Grenville in those examinations, right?

A. I was questioned extensively.

20 Q. And you were invited to share all of your stories, for example, of sexist or misogynist teachings or statements made by members of staff.

A. I did my best to remember at the times.

25 Q. Okay. And I'm suggesting that no where in these hundreds of pages of evidence that you've given before this trial did you ever mention, for example, that you were made to chant at a particular gathering of female students, "Chastity, monogamy, AIDS". If we do a search of all the transcripts, word search, we'll never find that because you never testified about experiencing that, correct?

30 A. I didn't testify on it yet because I hadn't remembered it.

Q. I see. So, you've just suddenly remembered it after all of these examinations?

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A. Sir, I've explained that I've done a lot of preparation to come into court. It's very painful to come into court. I had to sit and come up with - write down flashbacks over the last several months and I have recalled a lot more.

5 And respectfully, the last three examinations I was only answering what you asked and your team asked me. It was just scratching the surface of the thirty-year experience.

Q. I'm suggesting that you were not at any session in which students chanted, "Chastity, monogamy, AIDS".

10 A. I was at those sessions.

Q. And I'm suggesting that you have acquired a false memory of that happening by conferring with Lisa Cavanaugh or reading the evidence that she gave about that.

15 A. I did not read her evidence and I am not making this up. I was at that session.

Q. You've spoken with Lisa Cavanaugh during this trial?

A. Yes, but I didn't get that memory from her.

Q. You've spoken to her prior to this trial?

20 A. I did not get that memory from her.

Q. Did you speak to her before this trial?

A. Yes.

25 Q. And I'm suggesting to you that's exactly what happened. You're very quick to recall things to help corroborate the evidence of others that you didn't actually experience, isn't that right?

A. No.

30 Q. And tell me, Ms. Granger, what were the circumstances in which Father Farnsworth said he would grant you a second virginity? What were the circumstances?

A. That was a topic that he brought up at those blue lounge meetings and as I recall he said, "If you have had

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sexual experiences, you need to confess them to me and I will help you be cleansed and you can receive secondary virginity."

Q. I see. So, when was the session? What year?

5 A. Those were my - in my grade 12 and 13 years, I believe. And further, Ms. Bergeron was a - a speaker that would come into the school and she'd preach that same message to the students several years, late 80s into the 90s, I believe. She was even in the newsletter, so that's what reminded me.

10 Q. Well, you testified in-chief that Father Farnsworth told you this.

A. He used her message and he repeated it in those blue lounge meetings.

Q. So, it was in a meeting with all the female students that he said this?

15 A. Yes.

Q. I see. And....

A. Also, her message was in front of all the students.

20 Q. So, it's just a coincidence that we find in the will-say of, for example, Jessica Ruddage, who I understand - have you spoken to Jessica Ruddage prior to this trial?

A. Only - I - she sent me a message that she was going to testify and I wished her good luck.

Q. Have you spoken to her, Ms. Granger?

25 A. That's what I said.

Q. Have you spoken to her?

A. I have not spoken on the phone. I wished her good luck. You can look at my Facebook.

30 Q. And if go through all those hundreds of pages of transcripts from all the times you've testified in the past, we will not find a single reference to Father Farnsworth saying that he would grant the female students a second virginity, will

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we? It's no where to be found in these transcripts, is it?

A. As I said before, those were scratching the surface.

5 Q. Those transcripts were - tell us all the sexist and misogynist statements that were made in the course of your time at Grenville. And in response to that, you never once mentioned that, among other things, he said he would grant you a second virginity, right? We won't find that in any transcript, will we?

10 MS. LOMBARDI: Your Honour, my friend might point Ms. Granger to where that question was asked in the transcripts and maybe that would help the witness.

MR. BOGHOSIAN: Well, no, that's...

15 Q. Q. I'm saying that you were generally told - asked, "Tell us about all the sexist and misogynist things that were"...

MS. LOMBARDI: Where was she asked that?

20 MR. BOGHOSIAN: Your Honour, this is my cross-examination.

THE COURT: Yes, it is.

MR. BOGHOSIAN: I'd like my friends not to interrupt.

25 THE COURT: Yes, it is. If you're going to contradict on a question normally you would take the witness to the question as you have been doing. Do you recall that question - I don't hear the witness adopting the same recollection that you have and I haven't read the transcript cover to cover. So, you may have to go and put it to her that she was asked the open-ended
30 question, "Tell us everything that you remember

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about"....

MR. BOGHOSIAN: Well, I'm thinking that we should
- I should file the transcript in...

THE COURT: I think you....

5

MR. BOGHOSIAN: ...electronic form.

THE COURT: I think it's a great idea.

MR. BOGHOSIAN: And Your Honour can search -
search for these terms.

THE COURT: Oh, you can do it....

10

MR. BOGHOSIAN: Second virginity.

THE COURT: You can do it either way.

MR. BOGHOSIAN: It's no where to be found.

15

THE COURT: We can do it either way, but I think
for the purpose of this line of questioning, if
there's an open-ended question that would require
the answer, give us everything you've got, that
should probably be put to the witness 'cause I
hear counsel objecting.

20

MR. BOGHOSIAN: Your Honour, we'd be here for
another day going through every question that
should have elicited that answer in the four
examinations that we have.

25

THE COURT: I think it's legitimate to at least
be able to put the question to the witness so
that the witness can either be impeached, explain
or it's clear what happened.

MR. BOGHOSIAN: The purpose is not - well, okay.

30

Q. Granting a second virginity, that's the first
time you've ever testified about that in this proceeding, was at
this trial on Monday, correct?

A. This trial I've been trying to add as much as
I can remember, even - and - and your memories come back slowly

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when you've been in trauma.

Q. And it's just a pure coincidence that Jessica Ruddage(ph) said in her will-say statement that she was told that in a private light session?

5 A. Sir, I did not see the will-say statements. I had no idea she had said that. What reminded me of secondary virginity was that I was look - Mark Bergeron, who is the son of Ms. Bergeron, I was thinking about him because he teaches my kids and I was thinking about his mother. And I remembered the
10 message that she used to give us and that Farnsworth adopted. This was in the last couple months. I've been trying very hard to bring everything to this trial that could help us, and yes, as a representative plaintiff, I was to represent.

Q. And - and there's a danger, Ms. Granger, that
15 these memories that you suddenly acquired in the last couple months are false memories that are coming to you because subconsciously you want to help very much the class win this case.

A. Sir, I'm not lying. I was at those meetings.
20 Whether or not I remember them in 2008, 2011, 2015 under extensive questioning is beside the point. I said yesterday and it's true, I was there.

Q. Ms. Granger, I put before you a document that I suggest is a posting that you made on the Facebook website of
25 Grenville Christian College, is that right?

A. Yes.

Q. And you posted it August 6th of this year.

A. Yes.

Q. And it says:

30

If you've got nine minutes and
you feel so inclined, check out

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5 this video. Ever since 2007
I've been gradually realizing
what a damaging cult GCC was,
but I still sometimes doubt and
question my convictions. This
video is a quick reference that
explains the criteria of cults,
and as a staff child I know GCC
10 ticks off all the boxes. I'm
wondering what boarding students
experienced/observed along these
lines.

15 That's what you wrote on that Facebook page on
August 6th of this year?

A. Yes.

Q. I'm suggesting, Ms. Granger, that this
demonstrates that you didn't have a clue what was going on with
the non-staff kids at all...

20 A. Sir....

Q. ...in terms of what they were experiencing.

A. I would not be in a very painful, difficult
trial right now and have endured 11 years of this if I hadn't
been convicted that students were damaged at Grenville. It's
25 because of the students that I've come forward since 2007. I do
doubt and question my convictions because I was abused for 30
years - or 28 and as an abuse survivor, you doubt everything
about yourself.

Q. I'm suggesting that the last sentence in that
30 message that you sent to all the other Grenville Facebook
members, "I'm wondering what boarding students
experienced/observed along these lines," demonstrates that you

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don't have a clue about how the non-staff kids were treated at Grenville while you were there.

5 A. I have a heavy burden to bear because I have more than a clue, I just wanted to understand as far as a cult what they experienced and how it was - relate how it - what's the word, connected with my experience.

MR. BOGHOSIAN: Thank you, those are my questions.

THE COURT: Did you want this to be...

10 MR. BOGHOSIAN: Yes, I do.

THE COURT: ...the next exhibit?

CLERK REGISTRAR: It will be Exhibit 20, Your Honour.

15 THE COURT: Exhibit 20. Thank you.

EXHIBIT NUMBER 20: "What is a cult" - produced and marked.

20 THE COURT: In terms of the transcripts, I'm in your hands, really. I think it would be very helpful to me to be able to follow my notes and the cross if I kept these copies for reference.

MR. BOGHOSIAN: You can keep those and I can also send you electronic searchable versions.

25 THE COURT: All right. Any objection to me. Dealing with it that way? All right, that - that would be great. That can be sent to my judicial assistant. Any re-examination?

MS. LOMBARDI: Yes.

30 THE COURT: Ms. Granger, do you need a minute before - you're almost finished, I expect, but if you need a minute....

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A. I think I can continue.

THE COURT: All right.

A. Yeah.

THE COURT: All right.

5

MS. LOMBARDI: Thank you, Your Honour.

RE-EXAMINATION BY MS. LOMBARDI:

Q. I just have three short questions for you.

A. Okay.

10

Q. You mentioned yesterday that there were some skits that were sometimes preformed for the students. I believe you mentioned something about one having a Ghostbusters theme, and I was just wondering if you could tell us a little bit more about what some of the topics of those skits were or how frequently they were put on for the students?

15

A. I just - I remember skits being put on at least, maybe, I don't know, maybe four times a year. It's hard to quantify. They always had a skit right before thanksgiving because it was the first break and they would - and this is from when I was a child, you know, up into my early teens. I don't know the extent to which they - they kept them going, but it seemed to me they were always giving a kind of message that, you know, you're going home, your parents don't want to hear negativity from you, let's keep everything upbeat and here's what you should say and here's - here's how you should make your parents feel good about your experience at Grenville. And it was light and funny, and as I said, sometimes there was a man dressed as the mother, not always. Cindy Barr and Sarah Patrick also, as I recall, were the mothers in skits sometimes.

20

25

30

Q. Thank you. Just this morning you were discussing with my friend, Mr. Boghosian, something called FactNet. Can you describe what FactNet is?

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5 A. From my recollection, and as I said, I didn't spend more than a few weeks looking at it, it was - it was a - kind of a database where you - like, a social media platform for people who were cult survivors and they could post anonymously about their abuse and their - and their experiences after having been part of a mind control group.

Q. So, when you say "cult survivors" are you referring to just Grenville?

10 A. No, I - I believe FactNet was a forum that a lot of different survivors of high control groups would post.

15 Q. Okay, thank you. My last question for you is, again, my friend, Mr. Boghosian, asked you whether or not you were aware of 150 former students having come forward and - and having given their statements about their abuse. And you said that you - you hadn't seen that. Do you know the number of class members that have come forward to say that they want to participate in this litigation? Do you know that number?

20 A. It's a vague changing number. I had heard, I think back in December, that it was 150 and I think it's changed and gone up from there, but I am not privy to who is writing in and what they're saying. The only thing I know is I've been trying to get my brother who has been extremely damaged by Grenville - took him 12 years to write his - his experiences for the lawyer and he finally did that this summer.

25 Q. So, you don't know if it's 150, 500 or something in between?

A. I don't...

Q. You don't know the number.

A. ...I don't know.

30 Q. Okay, thank you very much. Those are all my questions.

THE COURT: Thank you. Ms. Granger, I just have

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a couple of clarification questions for you.

A. Okay.

THE COURT: You spoke a couple of days ago about having to swim laps in a pool.

5

A. Yes.

THE COURT: In a certain amount of time?

A. Yes.

THE COURT: Do you know how long that pool was?

10

A. It was - I don't know how - I don't. It was quite big because it was built to have big groups of students in it. If you look at this room, I would estimate it was as long as this room...

THE COURT: Okay.

15

A. ...and someone would sit and time me. I couldn't just go and swim by myself.

THE COURT: How long did that go on for?

A. At least a summer.

THE COURT: How many days a week?

A. Every day.

20

THE COURT: You talked about Father Farnsworth...

A. Yes.

THE COURT: ...and how sometimes he would be one way and sometimes another way. How did you view him as a child?

25

A. I was always scared of him. I would duck out of - if I saw him coming down the hallway I would duck into a nearby doorway or a bathroom if I could. I did my best to try to act like I - I was comfortable when I was in his presence.

30

THE COURT: Did you ever see him as a father-figure?

A. No. I mean, that was my only experience, so

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I mean, I was born there so I didn't know what a father-figure was meant to be.

THE COURT: Can you help me understand your relationship to your own father during the period you were there?

A. My own father - I was very distant because I wasn't allowed to live with him very much, but I idolized him. He was really, really talented, especially in music, and I wanted to be like him. But we weren't close.

THE COURT: And how would you describe your relationship with your mother during the period you were growing up?

A. Again, very distant. I - I desperately wanted her love and her attention, but I wasn't - I didn't have access to it much.

THE COURT: And my final question relates to the diets and the interventions around the bulimia that you described. Who or - if it's more than one person, who made those decisions about whether you would be on or off a diet?

A. It was always coming down from the A team, like, Joan Childs or Judy James. When I was five I didn't - I can't remember exactly who, I thought it was Mrs. Haig and when I was put on a three-day diet when I was quite bulimic in my time at the Community of Jesus, it was the people that I was living with there.

THE COURT: Did your parents play any role in deciding things like discipline for you or things like diets?

A. No.

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THE COURT: Are there any questions arising from my questions?

MR. BOGHOSIAN: I - I have one question arising out of your first question, Your Honour.

5 THE COURT: Please.

MR. BOGHOSIAN: Q. Ms. Granger, the period that you were made to swim laps in the pool on a daily basis was after you had graduated from high school when you were a staff person?

10 A. Yes.

Q. Thank you.

THE COURT: Any questions arising from my questions, Ms. Lombardi?

MS. LOMBARDI: No, Your Honour.

15 THE COURT: Thank you for attending, Ms. Granger. Next witness?

MS. LOMBARDI: Our next witness is Richard Van Dusen.

20 RICHARD VAN DUSEN: AFFIRMED

EXAMINATION IN-CHIEF BY MS. LOMBARDI:

Q. Good morning, Mr. Van Dusen.

A. Good morning.

25 Q. May I call you Richard?

A. Yes, please do.

Q. Thank you. Richard, can you tell us where you live?

A. I currently live in Kingston, Ontario.

30 Q. And what do you do for a living?

A. I'm a fulltime student at St. Lawrence College.

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Q. And prior to being a fulltime student, were you working?

A. I was the general manager of the Thousand Islands Playhouse in Grananoque.

5 Q. And what are you studying at university?

THE COURT: I'm going to - sorry. We'll get started - this is - we have terrible acoustics in here, and even though you have...

A. And I speak...

10 THE COURT: ...a mic...

A. ...quietly.

THE COURT: ...you do have a quite voice.

A. Yes.

15 THE COURT: So, if you could pull the mic just a little closer?

A. Which one?

20 THE COURT: The silver one and try to speak a little more slowly and a little more loudly. I don't want you to feel you have to yell, but it will really help us all hear your voice.

MS. LOMBARDI: Okay.

A. Okay.

25 THE COURT: Thank you for your patience. The courtroom seems to just absorb sound somehow. I didn't even hear the last answer.

A. What was the last question?

30 MS. LOMBARDI: Q. So, we were just talking about what you're doing right now with your life. You had mentioned that you were going to school and that you had worked somewhere previously, if you can repeat that for the Court?

A. I worked in Grananoque. I was the general manager of the thousand Islands Playhouse in Gananoque.

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THE COURT: Thank you, that's better.

MS. LOMBARDI: Q. And you're a fulltime student now. What are you studying?

A. Accounting.

5 Q. Can you tell us when you attended Grenville Christian College?

A. I entered the school in the fall of 1979 and left in the spring of '81.

10 Q. And what grades were - were those for you in those years?

A. Twelve and thirteen. At that time 13 was still in place.

Q. Right, okay. So, can you tell us a little bit about how you came to attend Grenville?

15 A. To tell the story, I have to go back quite a bit.

Q. Okay.

20 A. I - I'll start when I was in grade three and I was in grade three in Tokyo, Japan. I went to an all boys school and was with the same - pretty much the same group of students. It was an international school so there were - there were students who would come for a couple of years and then go back to their country. We had about 110 different nationalities at that school. But within that framework, there was a core
25 group of us who went through school together. The class size was somewhere between 30 to 40 students. And that school - the graduation year was grade 12.

30 And the summer of grade 11, I was asked by my mother if I - because my father had just received a new job in Hong Kong, if I wanted to do my final year in Hong Kong and go with them or stay in Japan at one of my friend's house and do a year there. And of course, I wanted to be with my parents, so I

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went to Hong Kong for my final year.

The environment in Hong Kong - first of all, the culture of Hong Kong is completely different from the culture of Japan. The environment at the school was completely different.

5 It was a much larger school with thousands of students and it was co-ed. We didn't need to wear a uniform; we could wear whatever we wanted. There was no homeroom, there was a lot more freedom that I was not - I hadn't experienced, and I didn't know how to fit in and I struggled a bit on what to do. Everybody
10 was in their final year, they all knew each other and I was outside of the group in my final year.

We did a class trip that spring of 1979 to Thailand. When I was in Thailand, I got some drugs and came back to Hong Kong with those drugs. I was - it was a bad
15 choice. I was arrested at the (indiscernible) airport and then I was - attended trials and I don't know what the exact charge was but I was fined and placed on probation for a year.

There was some question about what - what are we going to do with Richard now and questioned about being deported
20 from Hong Kong. I finished my school in Hong Kong, I did graduate from high school in Hong Kong. To graduate in Hong Kong, you only need 16 credits and to get into a Canadian university, you needed much more.

So, we came back to - with my family, we came
25 back to Canada, we would come back to Canada. I grew up overseas. I'd spent very little time in Canada. We'd come back to Canada each summer to spend some time at the cottage that was close to my grandparents in a place called Ivy Lea in the 1000 Islands and we'd spend maybe about four to six weeks there. But
30 we were - we were a very close insulated group 'cause we didn't know anybody, so I spent a lot of time with my sister. So, really, my interaction with Canada was - even though I'm

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Canadian, was very limited.

But the choice was - getting back to the question, the choice was where - what should we do with Richard and the choice was to put me into Grenville Christian College and my understanding was the choice was made because Grenville had a very high success rate of placing its student in universities - Canadian universities, and you're taught how to be a leader in the Anglican faith. And so that fall I did my first year at Grenville Christian College.

10 Q. And you mentioned your family had a cottage. Where was that cottage?

A. It's a small - it's a street, really, it's called Ivy Lea and it's in the 1000 Islands just east of Grananoque.

15 Q. And you mentioned your grandparents also were living back in Canada. Where did they reside?

A. They lived in Brockville. My parents grew up in Brockville, so both of my grandparents were in Brockville.

20 Q. And so, where did you reside then when you attended Grenville?

A. I was a boarding student.

Q. And so, you were living in the dorm residence then?

A. Yes.

25 Q. Can you describe the dorm residence for us?

30 A. It was - the school, when I was there, was an older limestone building that had renovations done to it. I lived in the older - all the boys lived in the older building up on the top floor. And I don't know if that is the fifth or sixth floor; I don't remember how many floors there were, but it was the top floor of that building.

The - it was structured - it was a quite long

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building. I - I don't know how long, but quite massive. And the top floor was two large buildings; one on the west side and one on the east side - east side, west side. And in the middle, there was connecting rooms, two rooms in the middle.

5 On the larger rooms, they weren't divided up into rooms from floor to ceiling walls with doors. Instead, they were a series of wooden lockers, maybe six to seven feet high, and beside each locker was a single bed and there would be sections of about - I think eight beds facing each other with
10 these lockers and then if you move over to the next part, there will be another section. And each section had - was designated by one of the letters in the Greek alphabet. I was in the kappa section.

15 Q. And you mentioned the two smaller rooms in the center.

A. Yes.

Q. What were those rooms?

A. Those rooms weren't used for sleeping. They were used for the boys to iron their shirts, pants. We would
20 get regular haircuts, so a barber would come from Brockville and we'd line up to get our haircuts there. And occasionally, if any discipline needed to take place, they would take place in those rooms.

25 Q. Okay, thank you. So, how many roommates did you have in your section?

A. Well, all the boys in the school were - you could say as roommates, but in the section...

Q. Mm-hmm.

A. ...kappa section, we were eight.

30 Q. Eight, thank you.

A. I - I think eight.

Q. Can you describe for us what a typical daily

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routine was for you at Grenville?

5 A. I'll do my best to remember. We - we'd rise
- I don't know if it was 6 or 6:30, then we would shower. There
was two showers - two large showers or washrooms, one per
section, I believe, and so we had to be quick with our showers
'cause all of the boys had to have a shower before we ate
breakfast, so we were allowed a minute to shower. We'd line up
essentially for the shower and then go down for breakfast - oh,
sorry, I need to back up. We'd have to make our bed and making
10 sure that everything was perfect, much like you would expect in
the army with the corners tucked in properly and the pillow
placed properly and the locker all proper.

15 Then we'd go down to - to breakfast, and
breakfast, that was in one of the new parts of the building, the
new renovation, and it was referred to as the dining room. It
was a very large space, again, and I don't know how large it was
but it was large enough to have enough circular tables for the
entire student body and staff to eat together.

20 In the center of the room there was a small
riser, a stage maybe three to four feet high and on that stage
were two other circular tables. At one table would be the - the
Farnsworth table - we'd call it the Farnsworth table. It would
be Charles and Betty at the head of that table, Betty being
Charles' wife. And at the other table was the Haig table, and
25 it would be Mary and Al Haig at that table.

We were assigned the table. We were assigned
tables - I don't know how the decision was made who sat where,
but you had to sit at that table for a period of time until
you're reallocated to another table. So, at that table there
30 would be a mixture of boarding students, staff kids and staff.

Before we had our breakfast, we would say a
prayer, a type of grace thanking for the food, and then we would

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5 have our breakfast. And then after breakfast we would have a talk or a speech or some views from the Haigs or the Farnsworths from that table, and it could range from anything from how to be polite in society to how society is extremely evil and the devil is everywhere and you need to watch yourself. We didn't know which was it was going to go.

10 After that we would go to our class. The class - the classrooms were in the older part of the building, the same part of the building that had the boys' dorm. And again, I'm not sure of the floors, but it may have been on the third and fourth floor. The class sizes were somewhere between 15 to 20 students. I don't know how long the classes - each class were and honestly, I don't even know what the classes were...

Q. Okay.

15 A. ...that we did. I imagine we probably did French - not French, math and English. Other than that, I'm not sure what the classes were.

20 Then we'd have our lunch. The same routine at lunch where we pray before, sit at the same table that we're assigned to. After lunch, I do not remember having any talks from the stage. After lunch, we'd go back to our classes - no, sorry. After lunch we'd go for our rest period, so we'd go back up to the dorm and we would lie on our beds in quiet for about 15 to 20 minutes. That was our rest period and then we'd go to
25 our classes. We'd have a couple of classes in the afternoon. Again, I don't know how long these classes were.

30 Then after the classes we would have activities that ranged from sports practices and other ones, and the other ones, I don't know what they were because I did sports. There would have been a band practice, or been different clubs, but I don't know if they - I don't remember then taking place at that time or maybe on Saturdays. I'm - I'm not sure of that - those

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details.

5 Then after the - for me - my perspective after my sports activity, which I did soccer, basketball and track, after those activities, we would shower, put our uniforms back on and then go for our dinner. Again, the same routine in the dining room, same table.

10 After dinner we would have our study time. We could go to the library and there are a couple other rooms, mainly on the first floor, I don't remember going anywhere else, to do our studies, which would be homework or prepare for any upcoming test or exams that we had. I think it was around 10 o'clock, it was around the end of the day and then we would all file into the chapel. There was an Anglican chapel, which I believe to be Anglican, on the school premises and we were
15 praying - there was - there was a word for that com - I forget, there's a word that was used - the Anglicans use to bring the day down. I could be completely off on that, but there was some word around the whole thing. And then we would pray, come to the end of the day and up to the bed, lights out soon after
20 that, maybe 10:30, 10:15 or something, and then absolutely no talking. Silence until we do it all again the next day.

Q. Okay. And so, you mentioned that you were involved in sporting activities as an extra curricular. What kind of sports did you play?

25 A. I - I - track was in the spring, basketball in the winter and in the fall was soccer.

Q. And did you say that you only played sports and that was the only extra curricular that you were engaged in?

30 A. No, I was also - I'm a drummer and I've been drumming since grade three, and I enjoy that and I'm - I'm good at it, so I was in the band.

Q. Okay.

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5 A. And there was - at that time, the school was really focused on doing Gilbert and Sullivan plays, and so I was in the pit band for those plays, so I was practicing for those. I wanted to be on the debating team because I actually never heard of debating until I got to that school and I - I liked it instantly and I was good at it, but I wasn't allowed to switch over. I was told that I should be in the band, so I couldn't debate.

10 Q. So - so, you played some sports and you were in the band but not the debating team because...

A. Because they wanted....

Q. ...you weren't allowed to join?

A. They wanted me in the band.

15 Q. So, in going over this daily routine that - that you described for us, you mentioned that there was 15 to 20 minutes at maybe around 3:00 or 4:00 o'clock for a rest period.

A. I have to - sorry to interrupt, I have to clarify that, it wasn't - it was right after our lunch.

20 Q. Right after lunch?

A. Yes.

Q. Oh, okay. Thank you for clarifying that. Were there any other rest periods in the daily routine or times that there was free time?

25 A. I don't remember there being free time during the Monday through Friday period.

Q. Okay.

A. I do remember - I think I remember that there was free times on Sunday after chapel or after lunch. Chapel, lunch then free time.

30 Q. And so, how different was the weekend schedule? Obviously, you weren't attending classes, but what kinds of things were you doing on the weekend in your daily

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routine?

A. The weekend, we would occasionally go into Brockville to buy soap, toothpaste, necessities.

Q. Mm-hmm.

5 A. We would spend Saturdays cleaning the school in the morning and then in the - I think the afternoon is when we went into the town. We didn't all go into town all the time. Then if you didn't go into town - I don't clearly remember. We - we could play sports or we could do some free time then. And
10 then at night we were put into groups called "families" and these families - I don't know they decide who is in what family, but they involve the staff being the head of the family, and some staff kids, as well, and the boarding students. And then we would behave as we thought a family should behave, so we
15 played games and stuff like that.

Q. Okay, thank you.

A. And on Sunday we would have chapel service, which was a big part of the Sunday, and then we would have our lunch and then Sunday afternoons we were - were free, I believe.

20 Q. Okay, thank you. You mentioned that there was prayer before every meal and you mentioned evening chapel services.

A. Yes.

25 Q. Were there any other religious services or teachings that you received at Grenville outside of what you've just told us?

A. We were being taught all the time. So, there was lots of praying just about all the time, sometimes praying before the class, sometimes praying with meals. We were very
30 tied in to Father Haig's and Father Farnsworth's understanding of Jesus and Jesus' power. So, that permeated everything.

On Easter was a particular service that followed

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lent and during the lent - and I should know this because I did it for two years, but I don't remember how long - many days lent was, if it's 40 days or 60 days. But during that lent period, a lot of the staff members would - following the course in the bible, I believe it was, would only eat grapes; grape juice and grapes. And then that would end on Easter.

So, Easter was a - another - or more heightened, I guess is the right word, chapel service. And I remember we would go to the chapel and the chapel was - was two floors. There was a main chapel floor and at the end of the chapel floor was - I don't know what it was called, I can't believe I forget all these religious terms, is where the priest preaches.

Q. Mm-hmm.

A. And then there was a balcony on the other end of that that faced that, as well. So, we filled both those, the down floor - the downstairs floor and the upstairs chapel, the pews upstairs. And then we would - they all had kneelers. So, the kneelers would come down and then we would sit and pray, and Father Haig and Father Farnsworth and sometimes Dr. Stewart(ph), who was also an Anglican priest, would be at the front wearing their robes, their Anglican robes. And the prayer was pretty much a silent prayer of occasionally a group of - would start singing hymns spontaneously, quietly.

Father Haig and Father Farnsworth would be saying things like, "Thank you Jesus," or, "Jesus is strong," or, "Yes Jesus, yes Jesus." And then sometimes - and this part I remember - people would start to - what you call speak in tongues. So, it would be a jabbering phonetic sound coming out of somebody's mouth quietly forming the rhythmic cadence of a sentence but not in any language that we practice on the earth.

And that would build the momentum and others would start to speak in tongues and soon people would have their

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hands in the air saying halleluiah or praise Jesus and it would grow from there. And I remember one - the service that I attended; Craig Tubman was his name. Craig Tubman was speaking in tongues. He ended up running out of the chapel and running up and down the long driveway praising the lord and speaking in
5 tongues. So, that was the other one that I remember.

Q. How long did that service last?

A. I don't remember that. It was dark at night, so into the night...

10 MR. ADAIR: I'm sorry?

A. ...but it may have started in the evening, as well.

MS. LOMBARDI: Dark and into the night. It was dark at night.

15 MR. BOGHOSIAN: I'm sorry, we're starting to have trouble with the volume.

THE COURT: All right. Let's repeat the last sentence and see if you can keep your voice up a little.

20 A. I - I don't know how long the service went or even when it started but I do remember it being dark at - dark at night.

MS. LOMBARDI: Q. Thank you. When you were describing for us your - your daily routine, you mentioned that
25 after breakfast there were talks or presentations from the - the head tables in the dining room. Can you just describe what you mean by talks or presentations?

A. They were educational in nature. They would range from Mary Haig teaching etiquette, how to hold a tea cup,
30 how to stand when a female comes to the table, how to open a door properly, how to address people properly...

Q. Mm-hmm.

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A. ...how to dress properly, how to use a napkin, where the tea spoon should be, to how the devil is everywhere in the world and we need to arm ourselves and let Jesus in our bodies to prepare against that.

5 And an example of that will be a TV was wheeled out and a video was played about AIDS, and AIDS - I remember being told through this talk was a - a weapon from God to eradicate the homosexuals for their sin, and I believe this was being hosted by Geraldo Rivera, this talk on AIDS, not how it should - it was used by god, but this information on AIDS and what it's doing.

Q. Okay.

A. And at that point it was only thought to be a disease that was only for homosexuals.

15 Q. Okay.

A. And then there will be other incidents where - and I'm not clear on how this was structured, but there was - there was a vibe or there was a feeling that there was something amiss, there was something wrong in the school and it needed to be rooted out. That was a term that was used a lot, cut it down at the roots was used a lot, that term, and I think it comes from the book of John. You need to cut it at the roots.

20 And so, there will be - I don't know how it was decided this - this needed to happen, but there would be a time period where we needed to be quiet until somebody confessed so that the roots could be cut out. And I remember one student from Hong Kong - now, because I lived in Hong Kong and in Japan, it was easier for me to connect with the - the Asian students. So, I remember a friend of mine, Roger was his name, his Canadian adoptive name, stood up during one of these moments and essentially confessed that he had homosexual tendencies and wanted that evilness in him taken out. And so there was - we

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want to praise the lord for confessing, thank you, and we will pray to get the evil homosexuality out of Roger.

Q. And so, how long would these - these talks go on for?

5 A. Do you mean the talks where we needed - the school needed to root out an evil?

Q. I guess any talk that was happening at this period of time after breakfast.

10 A. Normally the talk would - I don't know what time school classes started, but normally the talk would end in time for us to get to these classes.

Q. Mm-hmm.

15 A. I - I don't - it was some time around 9 o'clock, 9:15, 9:30 that our classes started, I believe. If there was a problem - if there was a vibe that Father - Father Haig or Father Farnsworth felt that there was an issue that needed to be rooted out, we would wait until it was rooted out. So, it could go into our class time and I don't know how long it went into, but I remember looking at my watch during one of them
20 thinking, "Oh we're going to miss some class time here."

Q. And so, you've said he would say things like there was a vibe and something needed to be rooted out. Can you give us other examples of the kinds of things that needed to be rooted out?

25 A. There was - at that time I remember the terms adultery was a big one, if - if we put more reverence into something that wasn't Jesus or god that that was bad, if it was your parents or if it was your friends. We couldn't do that so you couldn't really have a really close friendship with anybody
30 'cause that was a form of adultery. Self-centeredness was a term that I learned from that school where you - you couldn't just be focused on yourself. You couldn't - how I think of it,

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5 you couldn't - there was no room to be an introvert, you had to be an extrovert. You had to partake, you had to - you couldn't sit back and be pensive and consider what's going on. You needed to - so that was a problem that needed to be rooted out, as well. Those are some of the ones that I remember now.

Q. Okay, thank you. And you mentioned that you would sit there sometimes in these rooted out talks until somebody confessed.

A. Yes.

10 Q. Do you know what, if anything, happened after those confessions?

A. I - I felt it all very strange. When - when I got to the school, I was very vulnerable, scared and I didn't know what was going on and I needed something to help me, and I
15 - I couldn't connect with anything. And I remember the first meal at the table that I had - that I was assigned to, that there - when I got to the table, everybody was - when - the first time I was assigned to the table, you're told you need to go to the table and I think they had names or numbers and you're
20 sitting at table number or table name let's just say B. So, when I got to that table B, I was the last one there and everybody was already at the table.

There were two or three staff members and Joan Childs was one of them. Joan Childs was having - I could tell -
25 having some sort of complication, some kind of issue. There was a problem and I could just sense that. I don't know what it was. And so - and she was distraught or upset or uneasy with this. And so, everybody held hands and they prayed and asked for Jesus to come in to help Joan Childs and then after the
30 prayer, she was fine. So, I thought this is all very strange. I can't fit in. I don't know what - what's going on. Does that answer your question?

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Q. It does, thank you. Again, going back to your description of the dormitory, you spoke of two center rooms.

A. Yes.

5 Q. And you mentioned that ironing would happen there, the barber would come and cut the boys' hair.

A. Yeah.

Q. Then you also said that they were used for discipline. Can you...

10 MR. ADAIR: There was what? Sorry, I didn't hear your questions. You also said?

MS. LOMBARDI: Q. You also said that the rooms for discipline when needed.

A. Yes.

15 Q. Can you describe what you mean by the discipline that occurred in those rooms?

A. Yes, the....

MR. BOGHOSIAN: I'm sorry, which rooms, I - I....

MS. LOMBARDI: The two center rooms...

20 MR. BOGHOSIAN: I'm sorry.

MS. LOMBARDI: ...in the boys' dormitory.

MR. BOGHOSIAN: Thank you.

THE WITNESS: In the boys' dormitory on the top floor, there was two sections. It split up the boys that went to that school. In the middle of those two sections were two rooms where we would do our ironing and get our hair cuts. Occasionally, there will be an discipline activity that needed to take place. And the ones that I remember, they would happen at night when we were sleeping, and I - I'll just recall one that I can speak to because it happened in my

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30

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section.

5 So, in my section of eight, there was a student
by the name of Craig Tubman, I believe, who had a
consistent, sort of, clearing of his throat cough
condition all - like all the time he was going
"hmm hmm hmm" endlessly, even at night, and I
don't know why that was. But he was pulled from
10 his bed at night when we were sleeping, taken -
and taken to that room. I - the lights came on
in that room and would filter into the rest of
the dormitory. So, that light, first of all,
woke me up.

15 I looked at Craig Tubman's bed which was next to
mine, it was empty. And I could hear mumbling
talking much like the closest way I can compare
it to is if you're a little child and you hear
your parents having an argument or something in
20 another room and you don't know what they're
saying, but you know it's an argument and it's
not normal. And then after that happened, Craig
came back to his bed and we - we never spoke
about it. We never - I never said to Craig,
25 "What happened?" It was just, sort of a known
thing that there was a disciplinary activity that
took place in that room.

MS. LOMBARDI: Q. Okay. And how often would
these night disciplinary sessions happen while you were at
30 Grenville?

A. I was there for two - two years and I think
maybe a dozen times. It's hard to remember exactly, but maybe a

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dozen times for those two years.

Q. Okay. And so, you've mentioned the after-breakfast talks and the ranges of topics that - that could be covered there, and you've mentioned the - the late night
5 sessions. Were you observant of any other kind of discipline or any other kind of practice that stood out in your mind?

A. The entire experience stood out in my mind as being very unusual and distributing. So, there are all these little things that happened within that context and they're all
10 strange because the whole - the whole experience was strange.

So, the one that I can remember is that I was at the Farnsworth table and in a sense being asked to sit at the Farnsworth table or at the Haig table was special - thought to be special. There were prefects up there or people who were
15 going to prefects or dignitaries who had come to visit the school would have meals up there. And I was at that table. I don't know why I was at that table, but I was at that table. And there was another student at the table as well and her name was Julie Watts and she was a very attractive Irish student.
20 And after we finished our meals, the students would clear the plates and take them into the kitchen.

So, that was happening. Father Farnsworth asked me to stay back as everybody - all the other students at the table were clearing plates and he turned to me and he said,
25 "Julie has a body odour problem. Can you tell her that she needs to use deodorant?" And it was told to me in such a way that I needed to do this otherwise there - there would be consequences. You know, as a young person, you get the vibe when adults ask something. And so, I did. When she came back
30 to the table I - I told her that and she obviously was upset. There was tears in her eyes and devastating for a 16-year-old girl to hear that from - from a boy student.

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Q. And so, how did you feel telling her that?

A. The - the - being at the school was, in a sense, very numbing. I - I don't know. I just - I just did it. I was - as I said, I was in this state where I was already
5 vulnerable, already confused in, what I suppose, is my home country, in this environment that it was just so unreal. I just - and I needed something else that they weren't offering me. So, to say how I felt at that time saying it to her, I was numb and I just did it 'cause I had to do it. You learn quickly that
10 you do things to survive and so I just did it.

Q. When you told this to her, was Charles Farnsworth still there or had he left the table?

A. He was there.

Q. And what did he do, if anything, to your
15 observation when Julie started welling up?

A. I don't remember him doing anything.

Q. So, you just said that there were ways that you figured out how to survive, so maybe we can talk a little bit now about the rules at Grenville. What can you tell us
20 about some of the rules that the students had to follow?

A. There were standard rules. I don't know if they're written down, but they involve things like you don't wear jeans, keep your hair cut a certain length, no - no swearing, no bad language, you're not allowed to be in a room
25 alone with a male and female student ever in any circumstances, you have to be - you can't be late, you always have to be on time, and you can't - you know, talk at night. There's various standard rules like that.

There was also these unwritten rules that you
30 pick up and learn and I - and that - that's based on living the positive Grenville Christian life in a way that you, sort of, tune into, and that was more difficult to - to understand. And

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even now, I don't really understand.

5 But you - how I - it came across to me for the
first time, when I first got to that school, you - I was - I
came with my parents with my one bag and I was - my parents were
- I was met - when the car came up, I was met by students who
said, "Welcome to Grenville, what's your name? Oh, you're going
to be up in my section up in the dorm." And it was all very
happy in a way that I wasn't familiar with. And then I was
taken up to the dorm and said, "Okay, unpack your stuff because
10 we're all going to meet in the dining room in 15 minutes," or
whatever it was, and it was something like I've never - that
simple action was something that I'd never experienced in my
life before. And then my parents were gone and there I was.

15 And so, then I went down to the dining room
trying to look for some kind of landmark, something, some
familiarity, something that I can hang onto to - 'cause I was -
I was frankly scared. I don't know why I was in this school in
the first place. I don't know - I've never been without my
parents. I'd just been through this huge traumatic thing that
20 devastated my whole family and (indiscernible). And so, I was
looking around trying to find something and there was nothing
there. Everybody was smiling and happy and now we're going to
sing songs and it was all very - it sounds crazy to say that a
smiling room and everybody happy is actually a strange thing,
25 but it was all really strange, like, it just didn't feel
authentic. And so, yeah, I think I lost track of where I was
going with your question.

 Q. So, you had said there was some unwritten
rules....

30 A. Oh, right. And so, that was the environment
of the school and I was disciplined very quickly which helped me
to understand that I needed to get into that environment if I

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wanted to survive.

Q. Just going back to that environment that you're describing, you're saying the positive Grenville life.

A. Yes.

5 Q. What were some of the features of this positive Grenville life to your observation?

10 A. You had to smile. You had to engage in all activities even if they were silly. We - we had to square dance, for example, and like it. We had to - we couldn't listen to rock music, we had to enjoy - I don't know what the kind of music they listen to in square dancing, we had to enjoy that music. We had to enjoy classical music, hymns, we had to keep smiling and keep engaging in whatever we were asked to do.

15 Q. And so, you said that you were - you were disciplined very quickly. So - so, can you tell us about that - that disciplinary incident?

A. When...

MS. LOMBARDI: Perhaps we should take a break, Your Honour, I apologize.

20 THE COURT: Are you going to a new area? Normally we would wait until 11:30 because that's what we told the construction people. I don't know if you were here, but we were having drilling and hammering, so we've given them a schedule that we're now keeping to. Unless - do you need a break now?

25 MR. ADAIR: No, I don't need a break. I just knew my friend was moving into a somewhat new area and I just made the suggestion. I'm totally fine and I'm sorry to have....

30 THE COURT: No, as long as it's quite, let's keep to our times.

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MS. LOMBARDI: Okay.

THE COURT: If everyone's all right, otherwise we can be flexible too, but they will probably start drilling right at 11:30, so...

5 MS. LOMBARDI: Fair enough.

THE COURT: ...let's use the time.

MS. LOMBARDI: Thank you, Your Honour.

MR. ADAIR: Sorry to have interrupted.

10 MS. LOMBARDI: Q. So - so, my question was, you had indicated that you were disciplined very quickly. So, can you tell us about that first discipline?

15 A. Yes. During the first break, which is thanksgiving break, there was an opportunity for the boarding schools[sic], if they could, to go to live outside the school with their parents or relatives. Because my grandparents were living in Brockville, I went to stay with them for the thanksgiving break in Brockville.

20 During that break, I - another student from Grenville, and I forget his name, he and I decided to go and see a movie at the Brockville movie theatre. On the way there, in the shopping center area, we ran into another student from Grenville Christian College who was in grade 10 I think - grade 9 or 10. His name was Lanny Newell. He asked me to buy him some beer, and so I did. I bought him, I don't know, maybe a
25 12-pack or - I don't know how much, I bought him some beer. And then I left the beer with him and went to see the movie and that was that.

30 Then we went back to school after the break - excuse me - and during the first class, it was Mrs. Phelan class and I don't know what she was teaching, maybe it was math, but I'm not sure. Fifteen minutes into class or so, Bob Phelan came to the door, knocked on the door, opened the door and asked Mrs.

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Phelan if he could have me. And so Mrs. Phelan said yes. So, I got up and went with Bob Phelan. Bob Phelan says....

MR. BOGHOSIAN: Is that feeling?

A. Phelan, P-H-E-L-I-N.

5

MR. BOGHOSIAN: Thank you, sorry.

10

THE WITNESS: And Mr. Phelan said, "Follow me," and we walked down to the second - to the ground floor where that head office is, me following him, and I followed him down the east to the west side of the building, there's a far room on the west-south side. We open the door - he opened the door for me and asked me to step inside.

15

When I stepped inside there was a wooden desk in front of a window and Dan Ordolani was sitting at that desk facing the door. And in front of that desk was a wooden chair, your standard old wooden chair with - oak wooden chair with arms. And I was asked to sit in that chair. I sat in that chair.

20

25

Bob Phelan went around to where the window was and he leaned up against the window frame. And then he said, okay, we're going to pray and ask for Jesus to come into Richard's heart so that he will confess his sin. So, we prayed and then they asked me to confess and I didn't know what to confess so I said, "I don't know what to confess." They said, "No, you do know. It's in your heart. Listen to your heart and confess."

30

So, I had just come from a traumatic experience that never really resolved itself. I was very vulnerable. I hadn't talked about this incident

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in Hong Kong with anybody at all because that was the message that I got from my parents; we just don't talk about it. So, I thought that must be it. I'm going to confess to that.

5

So, I told the story about coming into Hong Kong with some drugs and then having been arrested and the subsequent consequences coming to the school. And when I was done, they said, "Don't lie, confess. Telling a larger lie than the actual lie is a worse sin." And then I said, "I don't know what to confess." So, they asked me to stand up, get behind the chair, pull my pants down, my underwear was still on, and they asked me to lean over the chair and put my hands on the arms of the chair.

10

15

So, I was leaning over like this and I could see Dan Ordolani Mr. Ordolani get up and walk to that side and out of my periphery I saw him come back with a paddle that looked like something that you would make pizza with, like that - the wooden structure with a handle on the end. And then he said that we're going to beat you. And so, he hit me and it was very hard so I jumped out, spun around and my instinct was to hit him back, but before I could do that - before I could do that, Mr. Phelan grabbed my hands and held them onto the chair. And then Dan Ordolani just kept beating me until they thought it was enough. And then they asked me to pull my pants up and sit back down, which I did, and then they asked

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25

30

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5 me to confess. And I - I didn't know what to
confess. And so, they told me the story about
how Lanny had gotten beer from me and then
subsequently got a hold of a car, drove drunk
through Brockville, was pulled over by the police
and that was a sin, and that was a sin that I
needed to confess because I participated in that
activity by buying him the beer. And then I was
10 told because I'd created this larger sin that I'm
basically a bad person and I needed to be
disciplined further.

15 So, I was placed on what they call "pots" and
that meant that after every meal, breakfast,
lunch and dinner, I'd have to go into the kitchen
and scrub all the pots, and I did that up until -
I don't know exactly how long I did that for, but
I remember Mr. MacNeil came to me with a letter
that he had in his hand and that letter I could
20 tell was from my parents. I didn't read the
contents of the letter, but I recognized the
typewriter and I recognized the Hong Kong address
and so I knew it was from my parents. And he
said that, "We've received word from your parents
25 that the story that you told is in fact true."
And then he said, "I don't know what we're going
to do with you," and never apologized for calling
me a liar or any of that stuff.

MS. LOMBARDI: Q. And did you still have to wash

30 pots?

A. I still had to wash pots after that.

Q. Just to go back....

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MR. ADAIR: Sorry, you did or did not?

THE WITNESS: I did nor did not what, sorry?
What is your question?

5 MS. LOMBARDI: Q. The question was did you - I
asked you if you still had to wash pots after you had this
conversation with Mr. MacNeil where he acknowledged that your
story about Hong Kong was true, did you continue to wash pots?

A. I believe I did, yes.

10 THE COURT: I wonder if this would be a good
time?

MS. LOMBARDI: Yes, Your Honour.

THE COURT: Yes. All right. So, we will take
the 20-minute morning break.

15 R E C E S S

U P O N R E S U M I N G:

20 MS. LOMBARDI: Q. And just before the break,
Richard, we were talking about the discipline that you had
received. You described being paddled and then you went on to
describe being put on kitchen pots duties for some months in
addition to the paddling. And I just want to go back to when
you were paddled, because you described it for us. And I wanted
25 to ask you, when the paddling stopped, what happened? Where did
you go, what did you do?

30 A. After it was done, I was led back to the
class that I left by Bob Phelan. We walked back up to the
classroom on the third or fourth floor, knocked on the door. He
opened the door and I simply walked into the class back to my
seat, and I sat down. It was very painful to sit down.

MR. ADAIR: Sorry? I sat down and?

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A. It was very painful to sit down.

MS. LOMBARDI: Q. And did you remain in all of your classes to the end of the day?

5 A. I - I stayed in the class and after that class I went to the - the washroom and I checked my underwear and it was soaked with blood. I just simply pulled my underwear back on and carried on with the classes that I was....

Q. And what did you do after class? Did your discipline start right away?

10 A. That - the meal - the lunch meal, right away I was doing pots. What that meant was when the meal was finished, I'd go into the kitchen. The kitchen - there was two folding doors in the middle of the room that would swing both way, and off to the - as soon as you enter the kitchen off to
15 the right-hand side were those standard steel industrial sinks with one of those conveyor-type washing machine belts where all the plates go in and then all the pots are scrubbed there. So, I was there with a - another student, his name was Milton Wiltshire and I think he was from the Dominican Republic. He
20 was also on pots. So, we stood there, we couldn't speak, in silence scrubbing all the pots with little steel wire wool mesh-type sponge.

Q. Okay, thank you. And you also mentioned that during the course of time that you were on this scrubbing the
25 pots discipline, you were advised that they believed your story from Hong Kong. So, can we - I just want to show you some documents and maybe we can ask some questions around those.

30 So, these are a series of - of three letters, and if we just flip through - I apologize, they're double-sided, so I've - I've scribbled out what's not part of it. But the first we'll see at the top is dated January 11, 1980. And if we flip over to the next letter, it's November 27, 1979 and finally we

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flip to the third letter if you keep turning the page, should be the second last page of the bunch, November 21st, 1979.

5 And these appear to be letters back and forth between your parents and Grenville Christian College. It appears K.W. MacNeil principal is writing from Grenville. And those letters refer to each other in the first paragraph. So, I'll just give you an example of what I mean.

10 So, starting with the first one November 21st, 1979 which is at the very back. That's the first letter. If we flip to the Grenville Christian College letter of November 27, 1979 it says, "Thank you for your letter of November 21st," that kind of thing. So, there seems to be an exchange between your parents and Grenville. If I can have you turn up the Christian College letter dated November 27, 1979. I'd just like to read you the third paragraph there.

15 MR. ADAIR: With respect, Your Honour, these - the witness was not party to these letters. I didn't have any problem with the letters going in as authenticated but that's the end of the concession. I mean, you can't ask this witness about the content of the letters and whether he says something is true or not because you're leading the witness to the subject.

20 MS. LOMBARDI: I - I....

25 THE COURT: I wonder if before I hear from counsel, Mr. Van Dusen, would you mind just stepping out of the room for one second? Nothing to do with you but in order for us to have a full discussion about the objection...

30 A. Just through there?

THE COURT: If you just step outside and we'll call you in when it's time.

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...Whereupon the witness exits the courtroom.

5

THE COURT: Where is this in our exhibit book?
Do we have it...

MS. LOMBARDI: It's - it's...

THE COURT: ...in one of the volumes?

10

MS. LOMBARDI: ...in the supplementary exhibit
book which is - sorry, it's Exhibit 1 on the
motion. This was meant to form part of Exhibit 9
which was the third (indiscernible) but it
inadvertently was left out.

THE COURT: Ah.

15

MS. LOMBARDI: So, it's still found in that
Exhibit 1 to the motion volume.

THE COURT: So, it hasn't yet been filed?

MS. LOMBARDI: It hasn't no.

20

THE COURT: It's not been filed, all right. So,
as for the position of the defendants, it's
conceded it can be filed as authenticated, but
you're objection is more to putting it to this
witness.

MR. ADAIR: Yes.

THE COURT: Yes, okay.

25

MR. ADAIR: I mean, I told my friends that I have
no problem with the letters that were left out,
that was an accident. What - you can't use
letters between other parties is a vehicle to in
effect, lead the witness.

30

THE COURT: Well, I'm not sure we've heard the
question yet, so maybe in terms of what your
response to counsel's objection is....

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5

MS. LOMBARDI: I appreciate my - my friend's statement and that - that is not my intention. Mr. Van Dusen had testified to advising his parents about the incident and so these letters stipulate what Grenville knew about what he had advised his parents and parents confirming what they had heard from Richard. So, it's just simply to set out what the knowledge was between all the parties involved here.

10

MR. ADAIR: Well, that's fine. The letters speak for themselves.

THE COURT: Well, that's what I was....

15

MR. ADAIR: If you want to ask - you could ask the witness, "What did you tell your parents about something," you don't lead him to the letter. Put him through it and then ask him, "Is that true?"

20

MS. LOMBARDI: Well, perhaps then we could just simply mark these documents as an exhibit. I won't bring the witness to them. I will simply ask my questions.

25

THE COURT: There may or may not be ways to use them, but I - I think Mr. Adair is quite right, they'll speak for themselves as to what the parents knew, what Grenville knew and you can ask him about what he told his parents.

30

MS. LOMBARDI: Thank you, Your Honour.

THE COURT: And it could be a matter for submissions. So, let's make this the next exhibit.

MS. LOMBARDI: Thank you.

CLERK REGISTRAR: Exhibit 21, Your Honour.

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THE COURT: Exhibit 21, package of letters.

EXHIBIT NUMBER 21: Series of Letters - produced
and marked.

5

THE COURT: All right, then we'll have Mr. Van
Dusen come back in and continue.

...Whereupon the witness enters the courtroom.

10

THE COURT: Thank you, Mr. Van Dusen.

MS. LOMBARDI: Q. In the exchange with Mr.
MacNeil while he approached you while you were on discipline
doing pots, he advised you that the - the Hong Kong story that
you had told them was - had in fact been verified. So, my
question to you is did you tell your parents about this
discipline?

15

A. I did not.

20

Q. So, you did not tell your parents that you
had been paddled?

A. I don't remember telling them that, no.

Q. Okay. Did you tell them about the pots?

A. I don't remember telling them that.

25

Q. Did you tell them about the - the incident
that brought about the discipline? The buying the beer when you
were at the movies?

A. I don't remember saying that.

Q. Okay.

30

A. I - I knew my parents were very ashamed and
very upset over what happened, so I felt it best not to bring up
anything.

Q. When you say you knew your parents were upset

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and ashamed about it happening....

A. The arrest.

Q. The arrest, oh I see.

A. Yes.

5

Q. Back to Hong Kong.

A. Yes.

10

Q. In terms of the discipline that we're speaking of here, it's the one that you received at Grenville that resulted in the paddling, did you communicate any of that to your parents?

MR. ADAIR: Well, my friend has probably asked the witness that about seven times. This is examination in-chief, with respect.

15

MS. LOMBARDI: I was just trying to clarify, Your Honour, because the witness mentioned that they were ashamed by the Hong Kong incident and so he didn't tell them about it and I just wanted to clarify what that was. So, that's fine, I'll move on.

20

THE COURT: I did not - I do not recall telling them about the paddling or the pots. Then you asked about the beer incident, "I don't recall saying that," and then he added ashamed and upset.

25

MS. LOMBARDI: Q. How did that paddling make you feel, Mr. - Richard?

30

A. It - it - I was already distraught and vulnerable before the paddling because in the environment that I was in in the circumstances that got me into that environment. That made me even more confused and even more vulnerable and felt even more alone.

Q. Did you tell anyone other than your parents

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about the discipline? Did you tell any students or anyone?

A. I told a few fellow students. I told Milton, that I remember. I befriended two male students; one was Andrew Daniel and the other was Andy Craig and I told them.

5 Q. And to your observation, did they react to that information that you told them about your discipline?

A. Yes, then through that they - they mentioned to me that other people had been paddled. Then the one day while...

10 THE COURT: I think we're - we're getting off into things that have been told, so if you could steer away from hearsay answers.

A. Okay.

15 THE COURT: Stay away from what people have told you unless there is...

A. Okay.

THE COURT: ...an agreement that you can talk about that and talk about...

MS. LOMBARDI: I --

20 THE COURT: ...what you saw or heard...

A. Okay.

THE COURT: ...yourself.

25 THE WITNESS: Okay. One day when I was on pots with Milton, a woman from the ministry of some sort - some sort of ministry, I'm not sure which, was visiting for lunch and she may have been visiting for the morning or even after lunch, I don't know, but she was there at the Haig table during the lunch period, during the lunch that we had.

30 After lunch, I went back to scrub the pots with Milton and she came through the double doors and

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5

I don't think she came on her own. She may have had some senior staff members with her, but when she turned to speak with Milton and I, she was pretty much doing that on her own. And she asked what we were doing and Milton said that we were being disciplined and we were scrubbing pots.

10

And then she asked, "Oh, you scrub pots when you're disciplined?"

And then Milton said something to the effect of, "They also beat us."

15

And then she's like, "Oh, they beat you," and then Milton used his thumb and pointed towards me and said, "They beat him so bad he bled."

20

Then she left and then I went to the next class after lunch and there was an announcement this time over the loud speakers in the school asking for Richard Van Dusen to come to the head office. So, the teacher let me go to the head office and I don't remember the class that I was in or who the teacher was.

25

So, I walked down to the main floor where the head office was and Fred Christmas(ph) who was a senior staff member and an administrator was outside of the head office waiting for me. When I got there, he had pulled me aside and we sat down on the bench that was on the first-floor hallway and he said, "When you were beat, did you bleed?" And I knew that it was a very serious

30

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moment. I knew just by the sounds of the voices in the head office that that woman was in there and the head masters were in there, as well.

5 And I knew that I had to - my answer would be - have a huge impact, so I said it was a zit and then Fred Christmas said, "A zit?"

10 And I said, "Yes, zit."

And then he said, "Okay, go back to class," and he walked back into the office and I could hear the word "zit" in the office.

15 MS. LOMBARDI: Q. Okay, thank you. Was - was this the only time that you were disciplined at Grenville?

A. Yes.

Q. So, how did you manage to avoid any further discipline the rest of your time at Grenville?

20 A. I - I learned very quickly that I needed to - to not go through anything like this again, so I kept my eyes on the prefects, I watched how they behaved and I copied it. And it seemed to have worked. The following year I was made a prefect.

25 Q. And what were your duties when you were a prefect?

30 A. As a prefect, I was - you're given the role of a leadership student within the student body and so my role was to have that leadership role and it was exercised through various ways. One of them that I remember was that I was in charge of the section up in the boy's dorm, the eight beds, and my responsibility was making sure that all the boys would wake up on time, have their showers on time, make sure that their

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beds were made properly. I'd have to go around and inspect the beds and make sure that they were tucked in with the nice military style, the lockers were clean - cleaned. Yeah, that's - that's what I remember about being a prefect.

5 Q. Okay, thank you. How would you describe the general atmosphere at Grenville during your time there?

A. Horrible.

Q. How did you feel when you left Grenville Christian College?

10 A. When - when I left Grenville Christian College, I - I went to Queen's University. I was beginning my first year in economics. I was asked if - Grenville Christian College had a Kingston House, it was called, and in that house some senior staff members kids and all staff members kids who
15 were attending school - attending Queen's, would stay in that house and then on the weekends go back to Grenville. And I was asked to live in that house, to carry on living the Grenville way. I don't know why they asked me, maybe because I was a prefect. I said no, I didn't want to have anything to do with
20 that school, so I did not live there. I lived in the Queen's residence.

It was very difficult for me. I was unaware of what was happening to me, I had no knowledge of any of the technical terms, but I know that I was very withdrawn, very
25 depressed. I did horribly in all my classes. I remember at one point walking from Theological Hall to Union Street, which is a busy area - pedestrian area of students, no cars, and I remember walking so slow and I couldn't speed up and the general student population was just walking really quickly by me. And I
30 couldn't change how I behaved. I hard - drank a lot, I was just doing very, very badly and I couldn't connect with anything.

And after my first year I was placed on

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probation. Second year, no, so I was basically kicked out of the school for a year. I went to Japan during that year 'cause my parents were back - living back in Japan then and I reconnected with some of my earlier friends from my days at St. Mary's International School in Tokyo, and then I could start to feel my old self come back. And I've never mentioned in any of my resumes or anybody that I attended Grenville Christian College 'cause I was so ashamed of being - having my name associated with that place.

10 Q. And what impact, if any, has your experience at Grenville Christian College had on you?

A. It - I've been diagnosed with posttraumatic stress disorder and it's a permanent mental disability. How she explains it to me is that my adrenaline is at that fight or flight level all the time. Symptoms are difficulty concentrating, difficulty with socialization, difficulty with staying focused and some other things as well.

15 Q. Was it difficult for you to come here today and tell us your story?

A. To be honest, I did not want to come. I did not want to do this. I've been going to see a counsellor and my doctor prescribed some medication for me to take for while I'm here and I've taken that medication and I'm on it now.

20 Q. What medication is that?

A. I have it with me. It's lorazepam.

25 MR. ADAIR: Sorry?

MS. LOMBARDI: Lorazepam.

A. I was told it's a Valium-type pharmaceutical.

MS. LOMBARDI: Thank you, Richard, those are all my questions.

30 THE COURT: Cross-examination.

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CROSS-EXAMINATION BY MR. ADAIR:

Q. Mr. Van Dusen, you entered Grenville in the fall of 1979, correct?

A. Yes.

5 Q. And you had just come through the traumatic experience of Hong Kong at that time?

A. Yes.

Q. And that was a situation where you were charged with trafficking in narcotics?

10 A. I'm not sure of the exact charge.

Q. Okay. And there's some question in your mind about whether you were deported or not?

A. I'm not sure of the exact charge, as I said.

15 I did read in this letter from my parents that I was charged with a fine and a year on probation, which I just read a couple of weeks ago.

Q. And you - that was an event that caused a lot of issues, shall we say, in the whole family.

20 A. The question? I'm not sure what you're asking me.

Q. Yeah, that's what I'm asking you.

A. It - it caused - what it cause the family, you're asking?

Q. Yeah.

25 A. It put the family into a lot of embarrassment, frustration, shame and stress. It traumatized the family.

Q. And do you agree that when you arrived at Grenville, you were a confused young man?

30 A. Yes.

Q. And do you agree that when you arrived at Grenville you were also a rebellious young man?

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A. No.

Q. Well, did you rebel against the system?

A. Did I rebel against which system, sir?

Q. Sorry?

5 A. Did I rebel against which system?

Q. The - the Grenville system.

A. I didn't know how to fit into that system.

10 Q. And -- did you - I want to just ask -- Mr. Van Dusen you were cross-examined in this action of an affidavit you swore on and the cross-examination was on June 22nd, 2011, correct?

A. I'm just trying to find a date on this. Yes.

Q. On the front.

A. Yes, correct.

15 Q. And if you turn to page 37 of that transcript...

A. Yes.

20 Q. ...take a look at question 161. You can read it to yourself. And what I want to - have you had a chance to read it?

A. I'm just going to go back up and read what was going on before that if that's okay.

Q. Sure.

25 A. And that just seems like we're revisiting the same discussion.

30 Q. Yeah, and do you agree, sir, that you said in a blog posted on the internet on September 3rd, 2007, "I attended GCC for two years. I entered the school in 1979 as a rebellious student." My question is do you agree you said that in a blog?

A. Going back to 156, I used...

Q. Sir...

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A. ...the answer....

Q. ...start with this: did you say that in a
blog?

A. I don't remember saying that in a blog.

5 Q. Well, sir, it's in black and white here. You
said, "It looks like I did," correct?

A. That's what it says there, correct.

Q. And your memory would have been better on
that occasion than it is today, right?

10 A. I don't know if it would have been or not.

Q. Okay. And you wanted to offer some
explanation? I don't want to cut you off so go ahead.

A. Earlier on in the previous page I say I'm
reluctant to use the word "rebellious".

15 Q. Yes.

A. And you're pretty much saying what you're
saying again, "All right, and you were a rebellious student,"
when you mentioned Grenville (indiscernible) I still, I don't
consider myself to be a rebellious student. I - I have trouble
20 fitting in.

Q. Well, then let me read to you, sir, question
158. I'll read it to you:

25 QUESTION: All right. Were you
a rebellious student when you
entered Grenville?

ANSWER: Yes, I was.

30 Were you asked that question and did you make
that answer?

A. I did and then just one question down I
qualified it saying that it means that you don't agree with the

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system in place, that's what I mean by being rebellious there.
I didn't agree with the system that's in place.

Q. Well, sir, your answer was, "Yes, I was."
And then you were asked:

5

And what does being a rebellious
student mean?

10

ANSWER: It means that you don't
agree with the system that's in
place.

Then you were asked, question:

15

Well, sir, I'm going to suggest
to you that entered the school
as a rebellious student, not
that you got there and became
rebellious because you didn't
like the system, you entered it
as a rebellious student, didn't
you, sir, yes or no?

20

ANSWER: I was a confused young
man.

25

A. I was, yes.

Q. All right. Now - and you did not have good
marks from your previous institution, did you?

A. I don't remember. I think they were erratic.

Q. I beg your pardon?

30

A. I think they were erratic, but mainly you are
probably right, they weren't very good.

Q. Yes, and that had been a longstanding problem

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in school, poor marks, right?

A. Correct.

Q. And when you left Grenville two years later, your marks were good enough to get you into Queen's University?

5 A. They - I think I had average of 60-something and it wasn't just the marks that got me into university, it took a letter from my father and my grandmother.

10 Q. All right. And the entire time you were at Grenville, you, yourself, experienced one incident of discipline, correct?

A. That I remember, yes.

Q. And that incident, sir, was the one you told us about, being paddled and then put on D as it was called, right?

15 A. Pots is what I called it.

Q. Yeah.

A. I don't know about the D terminology.

Q. All right. And do you agree with me that the paddling was a response to a serious breach of discipline?

20 A. I was paddled because they thought I told a lie that was greater than the sin that they wanted me to confess to.

25 Q. And the act that you got in trouble for in the first place was buying - the reason you were there in the principal's office, whether you knew it then or not, was this business of buying beer for a grade nine student?

A. Yes.

30 Q. And the grade nine student and/or a friend had stolen a car and driven 100 miles or 100 kilometers an hour through Brockville?

A. Something like that, yes.

Q. And when you got back to school then you were

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called into this room where the paddling happened after insisting you confess, they told you to bend over a chair, right?

A. Yes.

5

Q. And no one was holding your arms at that point?

A. Correct.

Q. And either Phelan or Ordolani gave you one substantial stroke with the paddle at that point?

10

A. It was Ordolani.

Q. Sorry?

A. It was Ordolani.

Q. Ordolani, okay. And you swung around in an effort to punch Ordolani?

15

A. I believe so, yes.

Q. And that is when it was following that that Phelan held your wrists down and Ordolani really laid the paddle on you.

A. He continued to beat me, yes.

20

Q. Yeah. And then you were placed on this business of scrubbing pots and pans for several weeks, right?

A. Yes.

Q. And do I understand that this would happen at meal times, the rest of the times you'd be in class?

25

A. That's right.

Q. And so, being put on silence would be during the scrubbing of pots and pans?

A. Correct.

30

Q. And even then, as a student on a discipline, you were okay to speak to staff and prefects, correct?

A. If I was spoken to first.

Q. Sorry?

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A. If I was spoken to first.

Q. All right. And it was easy, I suggest, to have conversations even though you weren't supposed to with other students on discipline?

5 A. You could, yes.

Q. Yeah. And as you have indicated, you were not subject to other - any further discipline over the next two years at Grenville and you learned how to do it the way they wanted and became a prefect?

10 A. That's right.

Q. And your duties as a prefect were just as you've described?

A. Watching over....

Q. Yeah.

15 A. Yes.

Q. Now, let's talk about a couple of specifics regarding your time at Grenville. Do you agree with me, sir, that in your entire time at Grenville the discipline itself consisted of paddling and/or pots and pans?

20 A. That - that was my discipline...

Q. Yeah.

A. ...when I was at Grenville, yes.

Q. But not just your discipline, that was discipline at the school?

25 A. I couldn't speak to that.

Q. Well, I'm going to suggest to you, sir, that the only discipline you ever saw anybody else get was pots and pans or community chores, working around the property. Do you agree, sir?

30 A. The - the - not entirely. The only discipline that I saw was that experience, the one that I experienced. But the community work around cleaning the

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property, that wasn't a discipline, that was just a requirement...

Q. Yeah.

A. ...for every student to do.

5

Q. I understand that. It was part of - well, the Grenville program was you worked for five hours a week.

A. Yeah, Saturday you cleaned the school.

10

Q. Yeah. What I'm suggesting to you, sir, is the only discipline you were aware of, other than paddling, was pots and pans?

A. That's right.

Q. Okay. And generally speaking, that would last for one or two or three days?

15

A. Oh, no, that - for my experience, which I can only speak about my experience, much longer than that.

Q. For your - your experience lasted much longer, I understand that it's your evidence, I'm just saying generally speaking it was one or two or three days?

A. I don't know.

20

Q. Okay. And do you agree with me that there was no withdrawal of uniforms that you ever saw?

A. No, I never saw anybody have their uniform withdrawn.

25

Q. And do you agree with me that there was no punishments that were of the kind that had a demeaning quality, like being forced to dig rocks out of the grounds with your fingers in the winter until they bled? You didn't see things like that?

30

A. But I did see some demeaning actions, but I didn't see anybody digging any things out until they bled.

Q. Well, actions, I'm talking about punishments, sir.

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A. I didn't see anything like that, no.

Q. And you didn't see any scrubbing of the
dumpsters?

A. I did not see that, no.

5 Q. And there was nobody running around swearing
at students?

A. No, I didn't see that.

10 Q. And you mentioned some of these a mass light
sessions where Farnsworth would - or Haig would get the people
together in the chapel, the whole student body, right?

A. What type of light session? I didn't hear
the first part of what you said?

Q. A mass.

A. Oh, yes a mass.

15 Q. Get in everybody.

A. Yes, yes.

Q. And to the best of your recollection, there
were three such sessions when you were there?

20 A. Well, to be fair, the term "light session"
was not used. So, it was more like trying to get at the root of
the evil.

Q. Yeah. And there were three such sessions
when you were there? To the best of your recollection.

25 A. Yeah, I mean, I can't be specific on a
number, I'm sorry.

Q. Sure. And sir, you mentioned this business
of your friend Tubman, is it?

A. Craig Tubman.

Q. Tubman. Was he from Ottawa?

30 A. I think he was, yes.

Q. Yeah. And he - what you know is that he was
taken out of bed and taken to this center room and you heard....

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A. No, that's not Craig Tubman. Craig Tubman was the - the student who spoke in tongues.

Q. Who what?

A. Who spoke in tongues during the Easter....

5 Q. Oh. Well, who was the one...

A. The other Craig...

Q. ...with the....

A. ...I don't know his last name.

Q. The throat problem.

10 A. What - what was going on with him, he's constantly clearing his throat.

Q. Yeah.

A. I think it's Craig, but I don't know his last name.

15 Q. Oh, I'm sorry, I assumed it was Craig Tubman. My mistake. In any event, sir, and you said that there was about a dozen incidents where over the course of your time at Grenville where students were taken out of bed and taken down to the center room and everybody knew that there was a discipline
20 session or a light session or a confrontation, whatever you want to call it, right?

A. Yes.

Q. Well, I know these things are very difficult to recall, sir, after 40 years or at least I imagine they are,
25 but - bear with me for a minute and we'll see if we can help sort this out. If you go to -- I should have asked you before I go any further, you were cross-examined on an affidavit in this matter on October 7, 2008, correct?

A. Yes.

30 Q. And I'm going to suggest to you, sir, that on that occasion you could only remember one incident of someone being taken out of bed and that involved a fellow named John

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McCredie, right?

A. John McCredie, yes.

Q. Yes. And John McCredie was taken out of bed by fellow students, not by the staff, right?

5 A. Yes.

Q. And he wasn't taken to the center room at all, correct?

A. This was a story - an incident that was told to me by Tim Haig who was the son of Al Haig. He told me the story after we left the school in 2007 in a restaurant in Toronto.

10 Q. Right. So, this was a story that you didn't even remember, somebody told you about it?

A. That's true, yes.

15 Q. And do you agree with me, sir - well, let me take you to the - near the very back of that transcript, page 78, question 343. And the drill is, Mr. Van Dusen, and I have to read you the questions and answers and ask you if you were asked those questions and made those answers and then we'll

20 discuss the answers, okay?

25 QUESTION 343: All right. Now, this business of taking people out of their beds at night that you touched on earlier, what is your best evidence as to how often that happened during your two years at Grenville?

30 ANSWER: What do you mean by evidence?

QUESTION: Well, as you sit here, you are under oath.

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ANSWER: I see.

QUESTION: And what are you
telling me your best
recollection is, your best
evidence is as to how often you
say that happened?

ANSWER: I can recall the one
incident with John McCredie.

QUESTION: Can you recall any
other incidents?

ANSWER: It happened a long time
ago, I have a vague awareness of
it happening a couple of other
times, but I couldn't give you
specifics, so I am not.

Couldn't give it as evidence
under oath. I will just say
that one.

Were you asked those questions and did you make
those answers?

A. Yes.

Q. And do you agree with me on that occasion,
sir, you were not confident to testify to any other incidents
under oath?

A. I would not agree.

Q. And sir, one of the things you mentioned was
this business about discussions regarding AIDS when you were at
Grenville, right?

A. Yes.

Q. And Farnsworth would warn you about this or
Haig or other staff members?

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A. It was a presentation to the entire school.

Q. Yeah. And the theme was what? You tell me.

A. AIDS is God's way of dealing with the evil in the world.

5 Q. All right. And it was a - some kind of message, whether we agree with the message or not, that this is a terrible thing, watch out for it.

A. I'm not following you.

10 Q. Well, the - the message was that AIDS is a terrible thing, you have to be careful of these things.

A. I think the message was the power of god.

Q. The power of god, okay. And sir -- I just want to check something here. I'm going to read you a question and answer from your cross-examination on June 22, 2011.

15 Question 152 on page 35.

A. What was the page again, I'm sorry?

Q. Page 35, Mr. Van Dusen, question 152. And I'll read you the question and answer, sir.

20 QUESTION: Hang on, Mr. Van Dusen. What I want to know now, as you've heard some back and forth here, all I want to know now, sir, is are you sure AIDS was the subject of discussion at Grenville when you were there?

25 ANSWER: I don't know now.

30 Were you asked that question, sir, and did you make that answer?

A. I did.

Q. Now, Mr. Van Dusen, the issues you have had

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since Grenville, sir, that have led to therapy, do you agree with me that one of the issues has been a longstanding difficult relationship you had with your father?

A. I agree.

5 Q. And did you - do you agree with me that another issue, sir, was difficulties encountered as a result of a divorce?

A. I agree.

10 Q. And sir, it wasn't until 2007 or after when you began reading all kinds of things on the internet that you really tied any emotional problems into Grenville, was it?

A. That's true.

15 Q. And finally, I want to ask you this, sir: the sense I had from your evidence was that from the moment you arrived at Grenville, you had a lack of comfort, some degree of apprehension, am I right?

A. I was in a very vulnerable spot.

20 Q. Yeah, and you were very vulnerable. And sir, you had - you had, what for you was a horrible experience, but do you agree with me that there were a substantial number of other students for whom Grenville was a good, happy and positive experience?

A. I do not.

25 Q. You do not? Okay. Let's go then, sir, to - I'm going to read you another question and answer. Question 319 on page 67.

A. Of which one, sorry? Which....

Q. 319 on page 67 of 2011, I'm sorry.

A. 319. Page 319? No.

30 Q. Page 67, sir.

A. Page 67. Okay.

Q. Question 319. Question - well, let me ask

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you this then. In question 306:

5

QUESTION: All right, now a lot of things that you have mentioned are obviously going to have an affect on some people and maybe not on other people. But I want to ask you is whether or not you are aware from this situation becoming public that there are a substantial number of people, not just one or two, who have a lot of good things to say about their time at Grenville and feel it was a positive experience, whether you agree with them or not.

10

15

ANSWER: You were asking me if I'm aware of that?

20

QUESTION: I have.

ANSWER: Absolutely aware of that.

25

Were you asked that question and did you make that answer, answer yes in both cases?

MR. ADAIR: I should tell Your Honour that was a quote from the 2008 transcript.

30

MR. ADAIR: Q. So, sir, in 2008 you said you were aware of a lot of people at Grenville who had a positive experience, a substantial number. Now you're saying - now you refuse to agree with that, I take it?

A. When you asked me the question before you

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read this you said, "Do you think that Grenville Christian College was a positive experience for most people."

5 Q. No, sir, I - then if that was the impression you took, perhaps it was a poor question. Let me rephrase it. Do you agree, sir, that a substantial number of people regarded Grenville as a positive, happy experience?

A. Yeah, I - I qualify substantial, but there are people who believe to them it was a good experience.

10 Q. Well, sir, you - you agreed with the word "substantial" in 2008.

A. I did, yes.

Q. Okay. Those are all the questions I have, thank you, Mr. Van Dusen.

THE COURT: Thank you. Any re-examination?

15 MS. LOMBARDI: Just one question, Your Honour.

RE-EXAMINATION BY MS. LOMBARDI:

20 Q. Richard, you were asked by my friend, Mr. Adair, or it was put to you that you didn't see any punishments of a demeaning quality and you answered him, "I saw demeaning actions," and then he went onto focus you more on punishments. Can you tell us about the demeaning actions that you were referring to in that answer?

25 A. Well, when I - using the example of my friend Roger when he was placed in a situation where he felt that his true self was evil and then that was celebrated in a sense, they're demeaning who he really is. So, that is - and he's getting support from the whole school saying that who he is wrong and evil. But his true self is not wrong and evil, so
30 that is a demeaning action. And at the moment, I can't think of any other ones. I'm sorry.

Q. Okay, thank you very much, Richard.

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MS. LOMBARDI: Those are all my questions.

THE COURT: I have one question or you before you go related to the - that call to the administrative office after your co-student had said you'd been beaten...

5

A. Yes.

THE COURT: ...until you had bled, and you were asked if that was true and you said that it was a zit.

10

A. Yes.

THE COURT: Was it a zit?

A. I - I don't know because I can't see back there. It was just what I said to get me out of the situation. The amount of blood would suggest that it was more than a zit.

15

THE COURT: Did you ever seek any treatment for what happened?

A. No.

THE COURT: Okay, thank you. Thank you for coming. Any questions, sorry, arising from my question?

20

MR. ADAIR: No, Your Honour.

THE COURT: Okay. Thank you very much, Mr. Van Dusen, for coming. Should we take the lunch break and - and is the next witness - are we onto the defendant's witness who is out order...

25

MS. MERRITT: I think so.

MS. LOMBARDI: I believe so.

MS. MERRITT: Do you have your guy here?

30

...Counsel conferring.

MR. ADAIR: Yeah, perhaps there's a little confusion here. May I speak to my friend...

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THE COURT: Of course.

MR. ADAIR: ...for a moment? Thank you.

THE COURT: Sure, sure, sure. Do you want a minute to....

5 MR. ADAIR: Well, if I can just have your...

THE COURT: Sure.

MR. ADAIR: ...indulgence for a brief....

THE COURT: Of course, of course. Sure. So, the plan for the afternoon is?

10 MS. MERRITT: The plan for the afternoon was we thought Richard would be longer and as soon as Richard was finished, we were agreeing to do the defence witness. I didn't realize he's not here and not available. We're going to call Lisa

15 Cavanaugh and see if she can come back and we can get her started this afternoon and if necessary interrupt her evidence with the defence witness tomorrow 'cause he's not available apparently.

20 THE COURT: All right. So, we'll come back at 2:30.

MR. BOGHOSIAN: Excuse me, Your Honour...

THE COURT: Yes.

25 MR. BOGHOSIAN: ...we were told that Tyler Holmes was the next witness just last evening - last afternoon.

MR. ADAIR: No.

MR. MERRITT: No, we were going to squeeze in your guy before Tyler.

MR. ADAIR: Yes. It's okay, not a big deal.

30 THE COURT: All right. Well, let's see if we can have some more evidence this afternoon if you can get your witness back, otherwise - well, we'll

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Speak to it at 2:30. Thank you all.

R E C E S S

5 U P O N R E S U M I N G:

10 THE COURT: I'm advised that the second mic at
the podium will need to be used elsewhere
tomorrow, so I'm hoping we get it back by
Friday...

Okay.

THE COURT: ...but tomorrow be ready to use it
without amplification.

MS. LOMBARDI: Okay.

15 THE COURT: We will still have one for the
witness.

MS. LOMBARDI: I will try to project, Your
Honour.

20 MR. BOGHOSIAN: Your Honour, could this one maybe
get moved over?

THE COURT: That's just wired into the - yes.

MR. BOGHOSIAN: Oh, I'm sorry. It just looked
the same colour.

25 THE COURT: It would have been great - yes. We
only have two that amplify. Tomorrow we will
make do with one.

MR. ADAIR: Your Honour, I just forgot something,
may I step outside for two minutes without
interrupting the flow of things?

30 THE COURT: Of course.

MR. ADAIR: Thank you, Your Honour.

THE COURT: The next witness will be?

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MS. LOMBARDI: It will be Lisa Cavanaugh.

THE COURT: And I take it you've worked out the order of witnesses for the witness after this witness in a way that is satisfactory?

5 MR. BOGHOSIAN: Well, I would like to address this at the end of the day, Your Honour, who the witness will be after Mr. Holmes, which quite likely could be Friday.

THE COURT: All right.

10 MR. BOGHOSIAN: And perhaps also the witnesses for Monday.

THE COURT: All right.

MS. LOMBARDI: We're happy to have that conversation with counsel.

15 THE COURT: Right. Perhaps at the afternoon break you can share the updated plan and we can speak in chambers Thursday afternoon as before.

MS. LOMBARDI: Thank you, Your Honour.

20 THE COURT: Good afternoon, Ms. Cavanaugh.

LISA ANN CAVANAUGH: AFFIRMED

EXAMINATION IN-CHIEF BY MS. LOMBARDI:

25 Q. Good afternoon, Ms. Cavanaugh. May I call you Lisa?

A. Absolutely.

Q. Thank you, Lisa. Would you please tell us where you reside?

30 A. I live in Kanata, Ontario, just a suburb outside of Ottawa.

Q. And what is your occupation?

A. Currently, I am unemployed, however I work in

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the IT industry, specifically targeting small start up companies doing implementation processes for them.

Q. Okay, thank you. And what is your maiden name?

5 A. Laushway, L-A-U-S-H-W-A-Y.

Q. And when did you attend Grenville Christian College?

A. The fall of 1984 until the spring of 1989.

10 Q. And how did you come to attend Grenville Christian College?

A. My mother sent me there after grade five, so I started attending in grade six.

Q. Did you have any input into which school you were going to be sent to, or?

15 A. No.

Q. And so, you started in grade six. Were you boarding in grade six?

20 A. No, I was not. I was a day student in grade six, seven and eight. And for grades nine and ten I was a boarding student.

Q. And how far was your home with your mom from the school?

A. I would say five to ten minutes. We lived in Maitland, so.

25 Q. So, what was your schedule like as a day student?

30 A. It varied year to year. So, my first year, which was grade six, we were to be at the school by quarter to eight in the morning and we would drop our coats or our bags off at our lockers, our assigned lockers, and you would go to your assigned table until the elementary students were dismissed, at which point we would go to the second floor where the elementary

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5 classes were and we would attend a chapel service. Just a small
maybe 20-minute service. And any announcements after that
service would be done there that pertained to the elementary
students. We would attend classes until 12:30, 12:25 and then
we would make our way to the dining room for lunch. Then we
would head back from lunch to our classes and the school day
ended at four o'clock.

10 For grade seven it was slightly different. Still
arriving at quarter to eight. The same routine of going to the
dining room and dropping off your coat at the locker. However,
we were required to stay for the high school announcements, so
we weren't like the elementary students who got dismissed. Then
after the morning announcements, there would be a small - what I
would call meeting, and then we would, after that meeting, go to
15 our classrooms, attend class 'til 12:30 - well, 12:25. Make our
way to the dining room for lunch. Lunch would typically be
dismissed around 10 after one, quarter after one and we were to
be back in our classes by 1:30, which was nice because it gave
us a moment if we wanted to walk up and down the driveway or
20 something. And then classes would be dismissed at four o'clock.

25 Now, with grade seven, you might be assigned a
work job from 4 p.m. to 5 p.m. in which case you would go do
your work job or you had free time. After - dinner would be at
5:30. Because I was a day student, I didn't stay for dinner, so
my mother would pick me up and then I would be required to come
back to the school to attend study hall from 10 to 7. Because
we were junior students, study hall ended at 8:15 for us and
then my mother would pick me up after that and we would go home.

30 Grade eight was slightly different in the sense
that at 4 p.m., you no longer had free time. So, it was the
identical schedule, but at 4 p.m. they introduced intramurals
because I guess they thought we had too much free time. And so,

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you had the choice of attending intramurals. There were certain days you could be assigned a work job and if you didn't do either of those things you would attend study hall. And then the same routine of being picked up at five o'clock, coming back at ten to seven for study hall and then study hall would be over at 8:15 and my mother would pick me up.

Grades nine and ten were very, very similar. We would wake up at six in the morning and we were to be showered, dressed and ready by 6:30. From 6:30 'til 7 we had what we called dorm duties. So, each of the girls in each room would have an assigned job. One might clean the sink, and each room had their own sink, locked drawers, you made your beds during this time, you cleaned out the sink, you emptied the garbage.

Each room had a dorm duty, so that could be cleaning the showers, cleaning the toilets in the bathrooms, sweeping the floors, sweeping the stairs. And then at 7:20 we went - yeah, 7:20 we went down to flag raising where we sung the national anthem and god save the queen, rain, shine, snow, sleet and hail. And then 7:30 to 8 o'clock was breakfast. 8 to 8:10 would be the announcements and the day would progress very much like it did grade six, seven and eight with classes and what not, with the exception of Tuesdays and Thursdays. Tuesdays and Thursdays, we had mass. On Wednesdays we only had classes in the morning. We had Wednesday afternoon activities during Wednesday and then when the Wednesday afternoon activities were completed, that would be at four o'clock and we would fall back into the normal routine of intramurals, work jobs or what have you. Dinner, study hall.

Compline was something that was new to me in grade nine, so after study hall ended at nine o'clock, we would attend compline. It was about a 15, 20-minute prayer in the chapel. And then we went back to the dorms for lights out.

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Unless, of course, you went to late lights, which was a late-night study hall. And then lights were out by 10, 10:15, and you would be silent. No talking in the rooms. And then the day started all over again.

5 Q. Thank you. You mentioned intramurals. Can you just define what that is?

A. Intramurals were activities, is how I would frame it. So, you might be playing baseball one day, you could be playing soccer the next. You might be playing volleyball.
10 It was just a way to get more exercise, I guess, and they knew where all the students were at that time.

Q. And were there also extra curricular activities, or just the intramurals?

A. No, there were - so, if you belong to the track team or any other sport event, cross-country skiing,
15 cross-country running, that would be the time of day that they would do training. After dinner was usually our free time which lasted 6:15 to 10 to 7, but usually after dinner you would have - that would be, like, when you had your band practice or choir
20 practice. So, it was divided up fairly evenly, but intramurals were just non-competitive games, I would say.

Q. Okay. Did you participate in any extra curricular activities?

A. I did. I was on the debating club, I
25 belonged to the chess club, I think I did track and field. That's what I remember for right now.

Q. And how long did you do track and field, for example?

A. Oh, I only made that mistake one year. It
30 was far too much running for me.

Q. Okay. Can you describe what the practices were like in track and field?

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5 A. A lot of running. If it was nice out, they would have you run from behind the school down the long driveway between the headmaster's house and the principal's house to Highway 2, then turn around and run back. And it wasn't jogging you were doing, it was running that you were doing, and they would have you run and run and run for an hour and 10 minutes. And if you wanted to stop, they would come, they would yell at you not to stop running. They would keep screaming at you and you would run until you were ready to throw up.

10 Q. Did you ever throw up?

A. I did.

Q. You mentioned that there were also some work jobs scattered throughout the day between four and five p.m. Can you just describe what some of those work jobs were?

15 A. Work jobs weren't just scattered at four o'clock. They could be period - a period within the day, as well. So, a work job could be that you would be assigned to help in the dining room. You might be assigned a task in the kitchen. You could be assigned housekeeping, so you'd be
20 vacuuming floors, wiping marks of the walls. Just general maintenance. Cleaning the toilets in the bathrooms outside the chapel was another one of my tasks.

Q. Thank you. So, when you were boarding in grade nine and ten, where did you reside?

25 A. I resided in Murray hall which was the girls' dorm.

Q. And can you describe the dorm residence that you lived in?

30 A. The residence itself had three floors. Each floor had its own bathroom where the toilets and showers were; there was a sink there. It had a bathtub. There were rooms on the first floor that you could only really house two girls to a

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room just based on their size. Other rooms had three girls to a room. Other rooms had four girls to a room. It just really depended on the size and the layout. Each room would have single beds. If you were in the two-girl room you might have just one bunk-bed. If you were in a four-girl room you would have two sets of bunk-beds. I once lived in a room that had one single bed and one bunk-bed.

At the end of the hallway on the second floor was the blue lounge. On the third floor at the end of the hallway was the dean's apartment. At the end of the hallway on the first floor, I believe, is where there were some staff residences, and I believe there was an apartment in the basement, as well.

Q. Okay. What kind of dorm room did you - did you reside in? How many roommates did you have?

A. It varied. In grade nine when I first started, I had a room with four girls. And then I moved to another room that had three girls. And then I moved back to a room with the same four girls I had originally lived with and that was first year. The second year I had a room with four girls, then I had a room with three girls, another room with three girls and another room with three girls.

Q. What was the reason for the - the changing of the rooms?

MR. BOGHOSIAN: Your Honour, I'm not sure if a foundation has been established to - for this witness to answer what the reason was. If there was one expressed, she can indicate, but otherwise it's speculation.

MS. LOMBARDI: Perhaps I could rephrase.

Q. Do you know the reason for you having been moved to various rooms?

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5 A. Rooms were moved quarterly, I would say, like three, four times a year. At that time, the impression that was left upon me was that they didn't want you to form close attachments because that would be construed as a special relationship. That's how I remember it. I was never told a specific reason why.

10 Q. Okay, thank you. I'd like to move onto the rules of Grenville Christian College. What were some of the rules at Grenville that the students, such as yourself, or you yourself had to follow?

15 A. So, when you arrived at Grenville, you would be - sometimes my mother would be mailed the student handbook before - like, a week before school started. Other times it would be handed out to us during the first week of school, which was usually a week later than normal schools. We started a week after Labour Day. And that first week was orientation week, and there would be a big orientation around the student handbook which outlined the rules that were in that book.

20 So, you were to wear one pair of earrings, there was no smoking, no drinking, no rock music, no radios. Your uniform had to be decent at all times. Just no boy-girl relationships in the form of a romantic relationships. There was a six-inch rule. There was a lot of written rules. That's what I remember at this time.

25 THE COURT: Can you keep your voice up a little.

A. Oh, yes.

THE COURT: It's - it's tailing off...

A. I'm sorry.

30 THE COURT: ...and the acoustics aren't good, so thank you.

MS. LOMBARDI: Q. What's the six-inch rule?

A. The six-inch rule was put in place with the

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5 students and girls and boys were meant to be six inches away from one another at any given time. So, you were not allowed to hold hands, even just touching someone on the arm, sitting next to someone, your legs were not to be touching. So, you had to be six inches apart.

Q. Okay. And you mentioned rules around the uniform and earrings. What were some of the other dress code rules?

10 A. Our underwear had to be brief only. There was nothing that was high cut. There was nothing that was bikini-style underwear. I remember at the time we used to call them granny pants. Bras had to be lined so that your nipples didn't show through. You were not allowed to have high-cut bathing suits. Bathing suits were to be extremely modest. At 15 the time, the - when I first started at Grenville, we didn't have the pool and then the pool got built. So, when the pool got built, that was when the bathing suits really came into effect and they had to have a skirt. And then eventually we were required to wear shirts and t-shirt over top of our 20 one-piece bathing suit.

Q. And how were these dress regulations enforced?

25 A. They were enforced by the dorm supervisors or the deans. So, when you - as a boarding student, I obviously didn't have to adhere to - necessarily everything because I didn't get the dorm check. So, as a day student, I would arrive and I would be somewhat inspected, is what I would say. But as a boarding student, upon leaving the dorm, you would be inspected. Your shoes would be inspected to make sure that they 30 were shined, that you had your - your knees socks weren't sagging, that your pleats were pressed, your shirt wasn't wrinkled, you were wearing a slip, a camisole, a bra, your

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sweater, unless dignitaries were coming or you were going into town or there was a reason for you to be wearing your number one, in which case they would inspect your blazer, make sure all your buttons were sown on.

5 Q. You mentioned underwear and bathing suits. How were - how were the rules around those items enforced?

A. For the underwear, we had dorm searches on a regular basis. I would say once a month. And they would go through your underwear drawer to ensure that you did have the regulation underwear. For bathing suits, they would have you try on your bathing suit and go to the blue lounge and you would be instructed to bend over in front of the deans. The deans would enforce this. And to ensure that you were not showing too much cleavage. And then you would be forced to bend over - turn
10 around and bend over again so that you - to ensure that your bum was fully covered.

Q. How did it make you feel to go through that exercise of bending over?

A. It - it was pretty humiliating. I'd never
20 had to do that before. It was foreign to me, but you had to do it, so you did it.

Q. Did you ever break the rules at Grenville?

A. Yes, I did.

Q. Can you give us an example?

A. On a Wednesday afternoon activity, we had
25 gone to the youth arena to go skating, and I had made friends with a girl called Debbie Forbes. And so, I snuck in a pack of cigarettes and we went to behind the locker room. There was a shower room and we smoked a cigarette.

30 Q. And so, were you found out smoking the cigarette in the arena?

A. Well, we weren't the brightest lights in the

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bulb at that age. I was in grade seven, so we never - it never occurred to us that the smoke would fill the actual locker room. So, upon everybody coming into the locker room, of course all you could smell was cigarette smoke. And eventually they
5 narrowed it down to who were the two people that were not on the ice at the time when that could have happened, and so yes, I got found out.

Q. And so how - how were you caught or found out?

10 A. I was called to the front lounge right outside the front office and Judy James, Judy Stewart and Sue Farnsworth were there at the time and they surrounded me and asked me what my sin was. And so, I denied because I didn't want to be punished and I lied and this went on for an hour.

15 They were yelling at me, they were telling me I had committed a sin, I needed to confess my sin and finally when I realized that there was no way out of this, I confessed that I had been smoking a cigarette. And that wasn't enough. That was when things took a particular turn and Judy James got right up
20 close to me, about as close as the microphone is to me now and got right in my face and demanded to know who was with me. At this point I was pretty frightened, so I told them that Debbie Forbes was, indeed, the person that I was with that day.

25 Q. And was that the end of the discipline for you, that confrontation?

30 A. Oh, no. They called my mother. They told my mother - I was a day student at the time, and they told my mother they were going to give me an internal suspension. I am unclear if my mother knew what that meant other than I - she knew that I would not be wearing the uniform. So, my mother would be required to drive me in every morning and I would be out of uniform, I would be in a dress and I don't remember who I

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had to report to, but I remember upon coming to the school, the next memory I have is I was in the kitchen working.

Q. And what time would you arrive?

5 A. I don't remember exactly. I want to say it was around 7:30, but I'm really not certain at this time.

Q. And so, how did the administrators - I think you mentioned Judy James, how did they communicate that this punishment would be imposed on you? You said they called your mom, but did they explain to you that you would be punished?

10 A. Oh, they told me I was going on discipline, so I was well aware of what that meant.

Q. Okay. And what did that mean to you at that time?

15 A. It meant that I would be put on silence. It meant that I would be wearing casual - well, not casual clothing, but a skirt, a blouse. I would not be wearing a uniform. I was not allowed to eat with the other students. Other students were not allowed to speak to me. I was only allowed to speak to the staff member that was supervising me at
20 the time, or if a prefect was supervising me. And I would eat in the pantry and do whatever they told me to do.

Q. Did you attend classes while you were on discipline?

A. I did not.

25 Q. And so, how did you make up the class time?

A. I didn't.

Q. What were your - your duties in the kitchen for this discipline period?

30 A. I worked in the kitchen morning until after study hall. My mother would pick me up at 8:15 and I cleaned the carts - we had carts that the plates went in. So, I would have to take all of the plates out of the carts. Then I would

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5 have to take this cart into where the pot area was and scrub the
wheel wells of this until they were shiny again. I had to dust
the pantry, turn all the cans so the labels were facing forward
and make sure that there was no dust on them. I had to help
clean out the - the walk-in refrigerator. So, anything that was
expired, I had to take out to the dumpster. I helped in the
dining room. I vacuumed the floors in the lower hallway. I did
a lot that week.

10 Q. And - and how long, sorry, did the discipline
go on for?

A. Five days.

Q. Five days, thank you. So, all your time
wasn't necessarily spent in a kitchen.

A. No.

15 Q. So, outside of the kitchen, did you have any
supervision in carrying out these duties?

A. Yes. So, if you were in the dining room, the
dining room supervisor at that time was Ms. Barnes. In the
kitchen I would be put in - Ms. Bushnell would have charge of
20 me. If I was in the lower hallway it would be Ms. Seaford who
was in charge of me. There were other times during that time
where I had to clean the staff apartments, in which case Maureen
Graham was in charge of me at that time.

Q. I'm sorry, who is Maureen Graham?

25 A. Maureen Graham was a student. She was a
prefect at the time.

Q. How were you treated by your supervisors
while you were on discipline?

30 A. You really weren't spoken to unless you were
given direction. There was - you weren't meant to feel as
though you were being punished. There was no conversation. It
was, okay, here's a flat of eggs, crack all the eggs. There was

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no, "How are you feeling? How are you doing?" It was, "Do this task. When you're done, come back and see me."

You definitely felt isolated. You definitely felt shunned because at the same time, you would have other students in the areas where you'd be working because they had their own work jobs. So, you might be doing the breakfast prep with the breakfast prep team. You might be doing dining room responsibilities and these other students were not allowed to talk to you and you were not allowed to talk to them. And they - they would shun you.

Q. And was this the end of the discipline for the smoking incident?

A. No. I thought it was. About two or three months later, I arrived at the usual prescribed time, at quarter to eight I got to the dining room, and for whatever reason I didn't realize that we were on discipline. So, I went to my assigned table, which was in the corner, and I sat down and I started talking, I was being bubbly. Somebody elbowed me and said, "We're on silence." I said, "Oh, okay."

So, after that I just - I didn't talk. I just sat there and I waited and we saw the pitcher of water going up to Father Farnsworth's table and that - I thought at that time, "Oh, no." So, Father Farnsworth did start to speak, and I'll be honest with you, I wasn't listening. I have no idea what he was saying at that time until I heard my name. And then I didn't know what to do. And so, the person sitting next to me elbowed me and said, "You need to go up."

So, I walked up to the - where the stage was in the dining room and we were being made to stand on the first stair of that platform. And I was about seventh or eighth in line that day. There was about ten or twelve of us being stood up. The entire student body was there. The staff members were

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there. And that was when I started to pay attending a little bit.

5 Father Farnsworth - the very first person in line was Ricardo Rolls and his sin was for being slovenly is how I would put it. It would seem he was on a work job on a Saturday and he stepped on a rake and knocked himself out. And they did not believe that he had knocked himself out. They thought he was trying to avoid working on his work job. They accused him of scaring Mrs. Farnsworth half to death and they just - they
10 went up one side and down the other. And that was when I started to tune things out. I just kind of picked a spot on the wall and waited for my turn.

And when it became my turn, Father Farnsworth came right up to me again, just a little bit further away than
15 the microphone and he pointed at me in the chest up here and he said, "You little girl, the city streets are lined with whores like you." And I couldn't understand why I was being chastised that way. I - I didn't - I didn't know why I was up there until I remember hearing something about smoking and I thought, oh,
20 well okay, at least now I know why I'm up here.

And then the tides kind of turned and he said that there was no good reason for me - or no, there was - the reason - it was no wonder that I was so rebellious because of
25 the way I was being raised and that was a direct reference to my mother who was a single mother, who was in what they would have considered a sinful relationship because she was not married, she had a boyfriend. And they continued down that path until they were finished with me and then they moved onto the next person standing beside me which was Debbie Forbes. And again, I
30 - I tuned out as best I could. I remember Kathy Kortus was after Debbie Forbes and I remember feeling so bad for Kathy because Kathy had a broken ankle or a broken leg and she was

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made to stand there the entire time on this step with a pair of crutches.

5 So, when they were finished with each individual, I guess it was to keep track, when they were finished with you, you would step down off the step so that they knew they were completed. When they finally finished with the last person in line, they opened it up to the student body and asked if anybody had anything to say. And I remember hearing a voice behind me and it was Lucy Postlethwaite because I made the grave error of
10 turning around to look to see who was talking and I was quickly admonished for that and told to turn around and keep my face front, so I did. And Lucy was talking to someone else who was standing up. I can't remember who this person was, but it was her friend or her roommate who was accusing her of having a bad
15 attitude and that if only she could change her attitude so that they could be friends.

After everything was done with the student body, 'cause this went on for hours, we were there for easily three hours. When it was finished, we were put on silence for the
20 rest of the day and each one of us was assigned a prefect as a big brother or a big sister. And that person would have to accompany you everywhere. So, they - you met them in the dining room, they would escort you to class, they would pick you up from class, they would take you to the dining - or to the
25 bathroom, they would - you had to be with that prefect all the time, which was no small feat in that school, especially when you've got different classes. The prefect who was assigned to me was Susan Lundeborg and I can remember she belonged to track and field, so I used to have to go with her to track and field,
30 in which case I would sit down and study and - while she practiced doing hurdles.

Q. How did this session, being stood up with

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those other students, make you feel?

A. I was terrified. I had no idea why I was up there at first, and then watching them come down the line and knowing that eventually it was going to be you on the hot seat next, it was very scary. Once it was finally your turn, the things that were said to you, you felt very humiliated, ashamed and still very scared, wondering what was going to happen next.

Q. And was this the only one of these assemblies, these types of assemblies where students were stood up and chastised for one reason or another?

A. No, no they weren't. I recall - I don't remember what - which year it was, but we were having another light session in the chapel and I felt so badly for this boy 'cause it would have probably been one of the first light sessions we had that year. And he made a very rookie mistake. We'd been in the chapel for a couple hours and Father Farnsworth said, "Does anybody have any questions?" This poor boy didn't understand that that was a rhetorical question, so he put up his hand.

And Father Farnsworth just kind of got this smirk on his face and he says, "Oh, okay there boy, what's your question?"

And so, Dan stood up and he said, "Will there be any bathroom breaks?"

And Father Farnsworth laughed because we didn't ever get bathroom breaks during these sessions. And he says, "Oh, do you have to go to the bathroom?"

And Dan says, "Well, yeah I do." And so he had the deans - the dean of men escort him out and to the best of my knowledge that I saw, I didn't see Dan for the rest of the day.

Q. And so, you mentioned this happened in the chapel?

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A. Yes.

Q. And the one that you described involving yourself, it involved the stage so it was at the dining room?

A. That was in the dining room.

5 Q. And so, were these the only two occasions where you called it a light session would happen?

A. No, light sessions happened five or six times a year, I would say. Typically, before a break or after a break. So, before, say, thanksgiving, we might have one. Sometimes after a break we would - we might have one, like, before and after a break, but they - to my recollection revolved around the breaks.

10 Q. And how long would these sessions typically last? You said your own lasted about three hours.

15 A. They could last an hour. They could last for days. There was one time I recall being put on silence for at least two days. That particular one that I recall was because we weren't right with God and we were going to sit in the dining room until we got right with God again. And that - that session went on for two days. There was no classes.

20 Q. Sorry, you said there were no classes?

A. Correct.

Q. And did you make up that class time in any way?

25 A. No.

Q. What would typically happen at the end of these assemblies?

A. Typically, people might be put on discipline. People might be - the entire school could be put on silence. It - it could vary to that extreme. Other days we would just be sent back to - if it only lasted a couple hours, we'd be sent to class, but we would be on silence for the rest of the day so we

30

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could think about the sins that we were committing.

Q. So, the example that you gave us regarding your own session, you were a day student at that time?

A. I was.

5 Q. And just to put it in context, the other example that you gave us, what that from your day student days or your boarding days?

10 A. I'll be honest, I don't recall. There were so many different ones, I just - I just remember the incident of this poor boy putting up his hand and asking if there would be bathroom breaks. I don't remember what year it was.

Q. Do you recall any distinction between the boarding day sessions and the day school sessions?

15 A. No. The only distinction that there was in terms of light sessions is that elementary students were never exposed to it. So, we would be dismissed before. So, in grade six, I never saw this.

Q. Both at the chapel example and the dining room example, you explained as being all the students.

20 A. Yes.

Q. Were there ever smaller sessions that occurred?

25 A. Yes, there were. You could have sessions that just involved the girls. I know that there were also sessions that involved the boys. One particular day, once again, when this happened, I was in grade nine. It was my first year boarding and so we got up and we were all told that we were on silence. So, we had to go to the - we had to perform all our dorm duties and go to the dining room and we were on silence
30 throughout breakfast.

After breakfast, the boys and girls were separated. The boys stayed in the dining room and the girls

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5 went to the chapel. And the reason this sticks out in my mind is because in the chapel, the boys and girls - boys sat on the left side, girls sat on the right side. And on this particular day, we were told to sit as close as we could to where the altar was. And it kind of created a little bit of confusion with the girls because we knew we weren't allowed to sit on the boys' side of the chapel.

10 But we did and there had been girls that had been missing that morning and we didn't know what had happened to them. They were just gone. I don't think I put much thought into it at that time, but they - they had been gone. When we were settled in the chapel, the deans were all lined up across the altar and that is when Father Farnsworth marched the girls, and there was about 10 or 15 girls. And this is when he told us
15 that - gave us a little bit of a lecture on cold grits, told us that, and I quote, "Cold grits taste like shit and we are - these girls represent cold girls and we are here to warm them up." So, the rest of that session, Father Farnsworth was there for about an hour talking about their sins and that while some
20 of the girls may not have broken any physical rules or actual rules, he knew that they were sinning in their mind, and we were here to warm these girls up.

25 So, then they - he left after a period of time and upon his departure told us he was going to the dining room now to speak with the boys because the boys had grown too soft and he needed to toughen them up, and they were going to watch the movie patent(sic). Then the deans began to have their turns on the girls that were - they had been running all day - or all morning, I should say. I'm not sure what time they were woken
30 up but they had been running all morning.

MR. BOGHOSIAN: Your Honour, there's no foundation for that. All the witness said

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earlier was that they were missing in the morning. There's no foundation for her knowing what they had been doing prior to that time, at least so far in the evidence.

5 THE COURT: I think I heard the - the deans continued and it may be that - well, I don't know what the evidence will be.

MS. LOMBARDI: Q. How - how did you know that they had been running?

10 A. Father Farnsworth told us that they had been running.

Q. Thank you. And so, now you were left with just the deans. Which deans are these?

15 A. Judy James, Judy Stewart, the assistant dean of deans of women were there also. So, that would have been Sue Tingley, Margot Mayberry. That's who I recall at this time.

Q. Okay. And what did the deans say to these girls?

20 A. They did much the same that they did in my light session where we were stood up. They started one by one and each girl. I remember one girl, she - they - I guess while they were running, they were made to chant some song like an army song, and Judy James asked her, "Why weren't you singing that song?"

25 And Aisha replied, "Because I'm Muslim." And I don't know what the song was and Judy James got very angry. I don't remember what was said after that, but it was quite a scene because Aisha - Aisha just would not bend. She would just stand there and stare her down. I'd never seen anything like it before. Usually girls cower and Aisha was just like, "No, I'm not having this."

30

Q. And how did that session end?

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5 A. When we were finally finished, girls were -
they were put on silence and then the rest of the time they were
made to do various work jobs around the school. It was as
though they were on discipline. They were on discipline for
some while. Each one came - might have come off at a different
time, so there could be some girls that were on it for a few
days or there could be girls that were on it for weeks.

Q. And - and how did you know how long any of
these girls was on a discipline?

10 A. We weren't allowed to talk to them and you
would see them cleaning the - we had a medallion in the floor, a
bronze medallion in the floor and you would see them at various
times they could be scrubbing that with a toothbrush, they could
be in the stairwells scrubbing the scuff marks off the walls.
15 We weren't allowed to talk to them. We were instructed to shun
them and some students did.

Q. How did you feel at this assembly?

20 A. Honestly, relieved that I wasn't one of the
girls. Scared. I felt very badly for the girls that were up
there. I understood what it was like to be stood up like that.
It was just very scary at that time.

25 Q. You mentioned earlier that Charles Farnsworth
had said about them - that some of them had sinned but some of
them had been sinning in their mind or something to that effect.
Did he - did he particularize the sins that....

30 A. There were some girls that he accused of
vanity. There were others that he accused of being lustful in
their mind. There were others that he accused of being
rebellious in their mind, that they weren't conforming, that
they weren't living in the light. There were all kinds of
accusations flying around that day.

Q. Okay, thank you. How many times were you

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disciplined during your time at Grenville?

5 A. Well, there was being put on D for smoking. There was my light session for smoking. There was a light session for my mail. There was another light session after a dorm search. Four, is that four times?

Q. I think so. So, what was the light session for your mail? How did that come about?

10 A. Because I moved close to the school and on Sunday afternoons, I was permitted to go home for a couple hours, I did not have to do that write the letter home to your parents because at various times I would be allowed to go home. So, I took time and I wrote a former student Meghan Thomas a letter and I had sealed it, I had the address on it, I put a stamp on it and I put it in the mailbox.

15 A few days later, after a Wednesday afternoon activity, I was called to the dean's apartment upstairs and Judy Stewart was there. I can't recall who else was there because Judy Stewart was leading this one. So, she had me sit down on the couch that was there. And I was presented with this letter
20 that had been opened, and she took it, she shook it like this and then she slammed it on the table in front of me and asked me what this was about.

Q. And where was she in relation to you on this couch?

25 A. She was standing. So, if I was sitting on the couch, so she would have been standing adjacent to me, but facing me, so kind of - almost where (indiscernible) is but a lot closer.

30 Q. Okay. And so, what happened after she presented you with this letter?

A. I kind of looked at her like a deer in headlights. I wasn't too sure, once again, why exactly I was

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there until she told me what my sin was. And my sin was that I had been talking about others behind their back and that was when I realized what was in the letter. And the letter had outlined that my friend Erin Block was having a boy-girl relationship with Shawn McFadyen.

Earlier in that day, I had been at the youth arena and I'd fallen and I had hit my head quite hard. So, I wasn't really responding the way that I normally would in a light session. So, after about a half hour, I was turning greener and greener by the second and I remember because I just - I stared at the carpet and it was a green shag carpet. And finally, she looked at me and she said, "Are you okay?" And I said, "No, I don't think so."

And she said, "Well, what happened?" And I told her I had fallen and hitten[sic] my head, and she took a look at me and sent me to the infirmary and that was how it ended.

Q. And did anything come of the letter and the light session?

A. No, because my mother had to come and pick me up and take me to the emergency room where I was diagnosed with a mild concussion and I was made to stay home for three days on doctor's advice.

Q. Okay. And the - the other light session that you mentioned was in the dorm.

A. There was a day, we were in study hall, and around eight o'clock all the girls were told to go to the dorm, change into your pajamas and meet in the blue lounge. And I remember this was, again, grade nine, so it's my first year, I hadn't done this before. I was kind of excited. I thought maybe we'd done something really good and maybe we were going to get to watch a movie.

So, I went to my room, I changed into my pajamas

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and I went to the blue lounge, as instructed. And when I got there, the deans were there, the assistant deans were there and there was a podium. And we were all instructed to sit down. So, where there were chairs, girls would sit on chairs, but the rest of us were pretty much sat on the floor. And Father Farnsworth came in. And he started off looking around the room and verified that we were all there, and then he said, "You ladies are all behaving like bitches in heat," is how it started, "And we are going to have a little talk." And I went, "Oh, no."

So, it started off first with a talk about uniform and uniform was designed in such a way as to cover the female body. It was designed not to fit too tightly so that it did not expose us in any way. And that we were meant to be chided, that we carried on - we carried ourselves with much decorum because if we ever fell to harm - if we were every in harms way because of a man, it was our fault for tempting them in the first place. Men and boys just can't help themselves.

At the end of that particular block, we were then asked - told to chant, "Chastity, chastity, chastity," over and over and over and over again. And we weren't loud enough, so he told us, "Louder. I want the boys' dorm to hear you. I want Brockville to hear you." And once he was satisfied that we had chanted enough of chastity, he moved on to talk about how women were expected to be monogamous with their husbands, that it was a sin to be outside of a relationship. It tied in somewhat with the chastity speech because one again, women, if you were ever in harms way, but we were the temptresses and it was our responsibility to maintain the monogamy in that relationship. Once he had finished that block, we were then asked - told to chant, "Monogamy, monogamy, monogamy," and again, louder and louder and louder.

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And then we moved onto AIDS and we were informed that AIDS was the plague that was brought to this world to rid us of the homosexuals. By this time, I honestly was starting to tune it out a little bit, but I do remember that statement. It was the plague that was brought to rid us of the gays, the fags, the homosexuals.

Once we finished that block, we then - he - he changed it up a bit and had us then chant, "Chastity, monogamy, AIDS," over and over and over again. And once again, louder and louder, "I want the boys' dorm to hear you, I want Brockville to hear you," and then - and then we were done.

During this time, the deans and the assistant deans, they had - it was either a binder or a clipboard and you would see them writing on this clipboard. So, as we were being dismissed from the blue lounge, certain girls were stopped by the deans and said, "No, you're coming with me." Fortunately, I was not one of those girls, so I got to go back to my dorm and go to bed.

Q. How long approximately did this session last?

A. We were dismissed from study hall at eight o'clock and I would say it was eleven o'clock we were finished. So, if you give us time to change, two and a half hours.

THE COURT: Ms. Lombardi, I wonder is this an opportune time for the break?

MS. LOMBARDI: This is fine, Your Honour. Thank you.

THE COURT: Let's take a 10-minute health break.

R E C E S S

U P O N R E S U M I N G:

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MS. LOMBARDI: Q. Lisa, we were talking about a session that you had where Charles Farnsworth was preaching some messages to you, and I think we left it off with you telling us about the time that it ended and you went back to bed, it being
5 11 o'clock. My - my next questions for you were was this the only session like this where those topics were discussed?

A. No. They were regularly brought up to us, usually within the context of other students, when they got stood up, they could be called bitches in heat, they could be
10 called jezebels, they could be temptresses. It was always reinforced to us that women, girls, were responsible for the behaviour of men, and if we were ever raped or injured or hurt at the hands of a man it was because it was our fault. Obviously, we had done something wrong and done something to
15 encourage that from the boys.

Q. Okay. In terms of girls gathered in their pajamas, was this the only such session in pajamas that you attended?

A. That - that's the only one that I recall,
20 yes.

Q. And approximately how many girls would have been in this session?

A. All of the girls that would have been in the girl's dorm. So, I have no idea how many girls that would be,
25 but all three floors were there in the blue lounge. It was crowded.

Q. Did you observe any reactions of others listening...

A. I did.

30 Q. ...during this session?

A. Some girls would cry. Some would visibly shake, but mostly it was some girls would breakdown and cry.

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Q. And how did you feel during this session?

A. I was surprised. I was surprised that it was happening in that fashion, meaning that we were in our pajamas and Father Farnsworth was wearing his collar and it just seemed very strange. By the end of it, I was made to feel ashamed of being a woman, being a girl. I was self-conscious, very self-conscious.

Q. Thank you. I just wanted to revisit the topic of discipline just for a second. You told us that you knew kids were on D because they were on silence.

A. Mm-hmm.

Q. Was there any other distinguishing feature that let you know that they were on D?

A. Everyone who was placed on discipline was stripped of their uniform and made to wear their - what we would call casual clothes. So, it was - the girls would wear a casual skirt that would be what I would call cocktail length, a blouse or a dress. The boys would be made to wear khakis and a shirt or whatever they had. And they would - you could identify them because if it was Monday to Friday, you were always to be in uniform. Well, if you saw somebody in casual clothes and it wasn't Wednesday afternoon activities and you were going skating then you knew that that person was on D and you were not to speak to them, you were not to go near them, you were - otherwise you would suffer the same.

Q. And did you ever see kids on discipline working anywhere other than the kitchen where you worked on discipline?

A. I did. They - you saw them all over the school. I remember - I remember the first time I saw this I would have been in about grade six and my mother was picking me up from school and there were four boys that were out on the

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front lawn by the stairs clipping the grass with scissors. And I don't mean like lawn style, I mean like manicure scissors. And they were out there and I remember looking at that and thinking, "Wow, that's weird." But being in grade six, I was going home for the day so I just kind of went, "Oh, okay."

I've seen boys do yard maintenance, picking through the rocks, cleaning - I've seen boys and girls clean dumpsters, doing laundry duty, housekeeping duties. Pretty much anything anywhere where there was any type of maintenance or housekeeping to be done in the school, they would do it.

Q. You also mentioned that there were work duties and you described what some of those were for us. So, what was the distinction between the discipline duties and the work duties?

A. Discipline duties could be a little bit more harsh. So, as working in the kitchen on a work job, you might be helping to prepare the next meal. You might be doing food put away after the meal. You could be a server, so you were serving the meal. When it came to discipline, it was the worst of the worst. So, if you were in the kitchen, you would be scrubbing pots, you would be scrubbing the wheel wells on those plate carts, you would be doing duties that would be outside the norm of a work job.

Q. And when you would perform these work jobs, whether it was cleaning or what have you, what was your attire for those work jobs?

A. You were in your uniform. You could talk to the people around you. So, there could be two girls, three girls, let's say, on housekeeping job that day. So, you might divide the task up between the two of you or you might just go and clean the bathrooms by the chapel together, so one would take one stall, the other would take the other stall, or one

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would do toilets, one would do sinks, that kind of thing. But you could talk and what not while you were on that.

5 Q. You just gave us an example of a memory you had of boys cutting the lawn with - you said manicure scissors. Were there any other incidences of your time at GCC where you saw something that has stood out in your mind, even today?

A. In terms of discipline?

Q. Sure.

10 A. There was all kinds of things. I remember being - so, the laundry facilities were located next to the boiler room. I recall that boiler room. I was aware, as through the rumor mill, that people had been taken to the boiler room, but to say that I ever had that experience myself, no. I was aware that people could be taken - well, one of my roommates
15 never came back from study hall - well, she did come back from study hall. It was late lights. And she went to bed and then when we got up in the morning she wasn't there. She didn't have a work job and the next time we saw her she was on discipline.

20 Q. Okay, thank you. How would you describe the general atmosphere at Grenville during your time there?

A. For me, I was nervous, anxious. You could walk through the hallways at any given time and be corrected for not smiling enough, bringing down the spirit of the school, you could be chastised for the way you walked, if your kilt swayed
25 too much that would be not a good idea. Something even as simple as crossing your legs, if you were sitting in a chair - so, on the edge of your chair and you crossed your legs, you could be chastised for that because the boys would be able to see the slip from the bottom of the chair. And that was deemed
30 as highly inappropriate and you were tempting boys at that point.

Q. So, how would you describe your overall

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experience at Grenville?

5 A. I view Grenville very much like I would
compare a bad marriage. Not every day was bad. I mean, there
were days we had fun. One of my favourite times to go used to
be the first week of school during orientation because we had
Brown's Bay day and Brown's Bay day was a lot of fun. There
were games, there was a bonfire, there was, you know, Mr. Irvin
or Mr. Childs would bring their guitar and there would be
sing-alongs. And we had the grade 11 carnival which was kind of
10 an in-house fundraiser to help raise money for the graduation.
So, that used to be fun. But for every one fun time, there
could be three negatives against it. So, to say I enjoyed it, I
enjoyed certain aspects of it, but I did not enjoy the overall
experience.

15 Q. A few times this afternoon you've described
yourself tuning out of things. Why were you tuning out?

A. These sessions that we had were very highly
charged and they could get quite emotional. And you learned
pretty quickly that you did not want to show emotion during
20 these sessions because if a girl was accused of being vain and
you started to cry, then obviously you must be feeling guilty
and sharing the same sin.

So, very often, if it was in the chapel, we used
to have the little small plaque on the wall where the numbers of
25 the songs for that particular mass service would be and what
psalm we were going to be reading from, and I would just stare
at that and try my hardest not to show any emotion, not to cry
especially. If I was in the dining room, I would typically pick
a spot on the wall that it would appear as though I was paying
30 attention, but it might just be above, kind of like the light
above the TV. I would just sit there and stare at it and try my
best to tune everything out.

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Q. Thank you. At your time at Grenville, did you ever see staff or students become physical with each other?

5 A. There was one day I was walking out of the girl's dorm and the way the buildings were linked, they were linked with hallways that were glass. So, the hallway that went into the girl's dorm was glass on both sides and the staff link was a wall of glass - of windows, as well. And as I was walking out of the boys - the girl's dorm, I saw Mr. Ordolani and David Ordolani standing outside - or standing in the staff link is what we would have called it at the time and I witnessed Mr. Ordolani throw David Ordolani to the floor.

10 Q. And what did you do when you saw this happen?

15 A. I got out of there 'cause I thought if I was deemed as seeing that, I would be in trouble too. So, I quickly left the area.

Q. So, you just described your experience as a kind of bad marriage, Grenville, and is this true for your whole experience as a day student and a boarding student?

A. Yes.

20 Q. You told us that your first light session and discipline happened when you were in grade seven while you were still a day student and that as a day student you would go home every night. You'd come back for study hall, but ultimately, you'd be going home. Did you ever tell your mom about your experiences at Grenville?

25 A. Well, obviously she knew I was on discipline. I told her about a time when - the rule was you were to wear on pair of earrings and it was discovered that I had gotten a second hole in my ear right here. And so, what I was doing is I was wearing one earring here in the upper hole and one down here in the lower hole which was one pair of earrings. And Judy James discovered after phys ed one day that I was not wearing in

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the lowest hole. And so, I was made to remove it.

So, I would remove the earring when I went to school and then I would put it back in when I would go home. And my mother noticed that my ear had become infected. So, she
5 asked me why, and I explained it to her. And I know that she called the school and spoke to the school about this. But the end result was that I was not allowed, so - to have that second earring. So, I don't really remember what the outcome was other than I was not to wear that earring in the second hole.

10 Q. You said your mom knew you were on discipline. Did she know exactly what that discipline consisted of?

A. She was told that I would not be wearing the uniform and that it was an internal suspension. That's all that
15 I know that my mother told me.

Q. When did you leave Grenville?

A. 1989. June of 1989.

Q. And where did you go when you left Grenville?

A. I went to Brockville Collegiate Institute.
20 It was the local high school that was close - closest to my home.

Q. And what was that experience like at - at Brockville Collegiate?

A. It was a little overwhelming. From the age
25 of 11 to 16, I had been under a pretty - very, very structured environment. I was used to a class size of 10 to 15 students. I was used to an environment where staff members demanded respect from the students. So, something as simple as - I remember on my first day at BCI it was so instinctive that when
30 the teacher walked into the room in my very first class, my very first time, I stood up instinctively, which is not something that students do in a normal high school.

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I found it hard to make friends because I just -
I simply didn't trust by that point, and it was just an overall
sense and feeling of being overwhelmed by everything, by the
class sizes, by the number of students in hallways. I witnessed
5 students, you know, just disrespecting teachers, you know,
telling them off and I was, like, wow. It was an experience.

Q. And so, did you graduate from BCI then? Did
you finished out your high school there?

A. No, I didn't. So, in my - I went grade 11
10 and grade 12 for - at BCI and then grade 13 I finished at St.
Mary's High School. I had told my mother I was not happy at BCI
and so, we came up with a better plan. We spoke to St. Mary's
Catholic High School and had a meeting with the principal there
and because I was a Anglican, they agreed to take me in even
15 though I wasn't Catholic. The class sizes were more what I was
used to. There was more personal interaction between the
teachers and the students. It was more of what I was used to.

Q. And so, how would you compare those
experiences at St. Mary's and BCI to the experience at
20 Grenville?

A. I found St. Mary's to be a little bit more
what I would call structure, you know, at every high school you
have to sign in and sign out. BCI, to me, didn't seem to care
whether you were there or not. St. Mary's was a very happy,
25 middle of the road. The rules weren't overly strict, you didn't
have to wear uniforms. The class sizes were smaller, which had
more meaningful interactions between teachers, which is
something that I was used to. And I enjoyed St. Mary's as
oppose to BCI. BCI was very cliquey. It was hard to fit into
30 the groups because they'd already been preestablished since
grade nine for a lot of them and they weren't - I wouldn't say
they were welcoming to new people or people that they had come

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back, but I didn't enjoy BCI as much, but I enjoyed it, I guess, more than I enjoyed Grenville because I definitely didn't want to go back there.

5 Q. You mentioned St. Mary's had some rules but they were not overly strict. What were some of the rules at St. Mary's?

10 A. Standard, you know, be respectful to your teachers. You know, if you're going to sign in and out it is mandatory that you sign in and out. So, if you had a spare, you could go over to the mall. They used to have a restaurant there that was called Brown and Round. You could go there for lunch. You had various privileges. You weren't encouraged to - I remember being encouraged to go even speak with guidance
15 counsellors and just to have a conversation. I had duties on the yard at lunch hour, which I was paid for, which included just supervising the younger students from grade six to grade seven and grade eight on the yard. It - it had more freedom. We didn't feel threatened. You....

20 Q. Okay, thank you. I'd just like to show you a document, if I might. Lisa, do you recognize this document?

A. I recognize my handwriting, yes.

Q. And what is this document?

25 A. It appears to be a Christmas card that I had sent to Grenville Christian College.

MS. LOMBARDI: May I have this marked as the next exhibit?

CLERK REGISTRAR: Exhibit 22.

30 EXHIBIT NUMBER 22: Christmas Cards - produced and marked.

MS. LOMBARDI: Q. Do you know approximately when

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you sent this Christmas card to Grenville?

A. I don't see a date on it, so - oh. I - I can't make out what the date - is there a date on it in the stamp, the victory verbatim stamp?

5 Q. I wouldn't - that wouldn't be a date (indiscernible).

A. I'm not sure which year I would have sent this.

10 Q. Was this sent during your time at Grenville or after your time at Grenville?

A. I believe it was - in previous cross-examinations I was told it was sent after I had left Grenville.

15 Q. Okay. So, you just told us that you didn't enjoy your experiences at Grenville, and - and can you tell us why you're sending a Christmas card?

A. At the time, I ha been maintaining relationships - friendships that I had made with some of the staff children. So, there was Rachel Irving, Rebecca Childs, 20 Jenny Puth and we were exchanging letters back and forth. When you were at Grenville, it was very impressed upon you that the proper etiquette would be - if you were to maintain contact, you had to address Grenville as a whole at some point. So, Christmas time you would be expected if you wanted to maintain 25 the relationship with a staff child that you would have to address Father Farnsworth. It was almost like staying in favour. It was socially acceptable to do that.

30 Q. Okay. Next I'd like to turn you to Exhibit 2 at tabs 127, 128 and 130.

A. Which is this?

Q. If I could have Exhibit 2 put to the witness.

A. And volume two or volume one?

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Q. It's volume two. So, if you could just look at tabs 127, 128 and 130. 127, 128 and 130, please.

A. And 130?

Q. Yes.

5 A. Okay. 129?

Q. 127, 128 and 130. You can skip over 129. Have you had a chance to look at them?

A. I have.

Q. And do you recognize these documents?

10 A. I do.

Q. And what are these documents?

A. They appear to be email correspondence with Robert Creighton.

Q. And whom else is the correspondence with?

15 A. Well, it's between myself and Robert Creighton.

Q. Okay, thank you. My first question is who is Robert Creighton?

20 A. Robert Creighton is a former alumni. He was there at my time. He as a few years older than I was. He was student leader, prefect, he was the lead in all of the G and S plays, he even came back after graduation and preformed in a G and S play.

Q. And why are you writing to him at this time?

25 A. I believe that this is because the first one on tab 127, I see that Nancy Smith is on here, as well, and we would have been talking about the closing of the school which is something that I thought was a good idea at the time. Still think it was a good idea at the time. Yeah, it's just - it's
30 regarding the closing and my initial reaction...

Q. And what was...

A. ...of the closing of the school.

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Q. ...what was that initial reaction at the closing of the school?

A. Shock, disbelief. I was very upset, I remember that. I had a lot of emotion, I had a lot of angst, is what I would say. I remembered some of my time there. But that's how I remember it.

Q. You say in the email at tab 128...

A. Mm-hmm.

Q. ...the first sentence of the last paragraph there, "This entire unfortunate situation is the talk of the town." Can you explain what you mean by that?

A. We were talking at that period of time about - we had started up a Facebook group and as I recall, we were also talking, at that time, about setting up something that we would be able to help out certain staff members. And so, I think what's important to - what's important for me is for people or for you to have an understanding of how this all, kind of, happened.

And the very first thing was there was the closing of the school, we got an email from Nancy Smith. And at that time, I was quite upset about it. I wasn't sure why I was upset, but I was upset. And so, I had reached out to Bob who was the head of the alumni association at that time. I knew at that point in time, because he was the head of the alumni association, that he would have emails for former friends who wanted to reach out and get in touch with one another and that sort of thing.

We had created a Facebook page at that time with the help of Ryan Seeley for the former students that they could gravitate to and, you know, keep in touch, that type of thing. It was a few weeks later that - maybe two weeks later that somebody sent me the link to FactNet.org, which is a site that

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was created - it was similar to a blog where people could post anonymously regarding - there was a whole section there on Grenville Christian College and the Community of Jesus. And I began to read FactNet quite veraciously. And that was when I realized that my feelings about Grenville and what I had been through, I was not going through those feelings alone.

I thought that I had been hearing so many positive stores about Grenville and seeing it in the news that maybe I was the only one who did not enjoy my experience at Grenville. Maybe it was just me. Upon reading FactNet I realized that not to be the case. My thought at that time was relief. It was in and around that time I think it was posted on FactNet that there was the potential for a lawsuit and I had decided that, oddly enough, while I would not participate in the lawsuit, I would certainly support anyone who would be involved in this lawsuit however I could. Meaning listen to them, talk to them, you know, that type of support.

Q. Mm-hmm.

A. And then we went to the closing and there was an unfortunate incident with Andrew MacNeil and Bob Creighton and Don Farnsworth and Paul Slater...

MR. BOGHOSIAN: I'm sorry, Your Honour, I'm having a lot of trouble hearing.

THE COURT: So...

A. Oh, I'm sorry.

THE COURT: ...so am I. That's actually not - the acoustics are terrible. It's actually that they're good, so I can hear the typing, I can hear a rustle of paper, I can hear a - your squeaky chair, it's the strangest thing. But it all is the same decibel level.

A. Yeah.

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THE COURT: You'll just have to overpower ever other sound in the room.

A. I - I will do my best. Where would you like me to pick up from?

5 MS. LOMBARDI: Q. You were talking about being at the closing.

A. Yes, and there was a very unfortunate incident with Andrew MacNeil, Don Farnsworth, Paul Slater and Bob Creighton, in which ultimately I had attended the closing
10 with my husband, my friend Jacqueline Slowey and Jacqueline Slowey's husband. And they had tried to remove Jacqueline and her husband from the school during the time of the closing because they thought that Jacqueline's husband was press, which he was not. He was employed at the Brockberry café at the time.

15 It was at that point in time after that incident because it was violent, Andrew MacNeil came right between a circle of friends and headed right for Andrew Slowey and was trying to grab at his jacket. He - his tone was angry, it was very - while it was physical, at the same time it was very - he
20 was loud, he was yelling, he was, "You, you're out of here. Come on, let's go." And then when we tried to convince him that this was Jacqueline's husband, he said, "That needs to be verified, you need to come with me right now."

Honestly, it felt as though you were in another -
25 a light session all over again, just with the tone, the attitude, the physicality of it. I really don't recall how that situation ended. I just remember being outside and I went for a walk down the driveway and then that afternoon/evening, that was when I decided to contact Loretta Merritt's office and say what
30 I had to say and give my testimony.

So, what these pieces are - you can see here one was on July 31st, so that was then before FactNet and then the

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5 next one is September 5th, that's after FactNet and I believe that was - there was a lot of fighting going on at the time between positive experiences and negative experiences. Emotions were every high, I think, for everyone at that time. Very raw because we were all suddenly being allowed to feel what we had experienced.

MS. LOMBARDI: Thank you very much, Lisa. Those are all my questions for this witness.

10 THE COURT: I think we will not finish today, so it probably makes sense to adjourn now until tomorrow. Would you please return tomorrow at 10 a.m.

MR. BOGHOSIAN: Your Honour, if we can just clarify?

15 THE COURT: Sure.

MR. BOGHOSIAN: My agreement of all counsel, Ms. Cavanaugh is going to be stood down so that a defence witness can go first up in the morning.

THE COURT: All right.

20 MR. BOGHOSIAN: And then she'll resume upon completion of that defence witness.

THE COURT: Do you have an approximate estimate of how long the defence witness will be?

MR. BOGHOSIAN: Probably two hours.

25 THE COURT: All right. So, you're safe to come back at 12 tomorrow and if you have to wait a little longer, counsel will let you know if we're not quite finished the other witness, but thank you for your patience with that. And I thank
30 counsel for working that out. So, we'll begin at 10 tomorrow. All right, anything else today?

MS. LOMBARDI: No.

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THE COURT: All right, remember no mic tomorrow,
so thank you all.

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Form 2

CERTIFICATE OF TRANSCRIPTION (Subsection 5(2))
Evidence Act

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I, Octavia Cumberbatch, certify that this document is a true and accurate transcript of the recording of Cavanaugh v Haig, held at 330 University Ave, Toronto, Ontario, taken from recording No.

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July 3/20 Octavia Cumberbatch

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