Vancouver
14-Jul-20
REGISTRY

Affidavit #5 of Shauna Stewart
Affirmed July 13, 2020

No. S1811960
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

T.L. an infant by his/her litigation guardian the Public Guardian and Trustee of British Columbia

PLAINTIFF

AND:

HER MAJESTY THE QUEEN IN RIGHT OF THR PROVINCE OF BRITISH COLUMBIA (MINISTRY OF CHILDREN AND FAMILY DEVELOPMENT AND DIRECTOR OF CHILD WELFARE) and ROBERT RILEY SAUNDERS

DEFENDANTS

AFFIDAVIT

I, Shauna Stewart, paralegal, of 511-55 East Cordova Street, in the City of Vancouver, in the Province of British Columbia, AFFIRM AND SAY AS FOLLOWS:

1. I am the paralegal to Jason Gratl, who is counsel of record for the Plaintiff, T.L., in this matter and as such I have personal knowledge of the facts and matters hereinafter deposed to, save and except for information imparted to me by other people, in which case I believe the source of the information to be reliable and I believe the information to be true.

2. Robert Riley Saunders ("Saunders") started his employment with the Ministry of Children and Family Development ("MCFD") on November 6, 1996, as a social worker at MCFD's Fort St. John office. Attached as **Exhibit "A"** is a copy of an excerpt of a letter of employment sent by facsimile and signed by Saunders on September 26, 1996. Attached as **Exhibit "B"** is a copy of the employment application form signed by Saunders dated November 4, 1996. **Exhibit "C"** is what appears to be a copy of a Bachelor of Social Work degree certificate issued to Saunders by the University of Manitoba on October 20, 1994.

3. Attached as **Exhibit "D"** to this affidavit is the annual employment review of Saunders dated March 23, 1999. This employment review concludes that Saunders "frustrates somewhat easily with resistant clients".

4. I am advised by Jason Gratl that the commencement date of April 1, 2001, for class members was selected by the Plaintiff and the Province on the basis that April 1, 2001, is the date Saunders moved from the Fort St. John office of MCFD to the Kelowna office. Before April 1, 2001, Saunders was not primarily a guardianship worker and accordingly did not generally have responsibility for or discretion over children in care. Prior to April 1, 2001, Saunders would primarily have been involved in child protection responsibilities for children who were not in care, including intake, investigation and child apprehensions. Attached as **Exhibit "E"** is a transfer notification dated March 29, 2001.

5. Attached as **Exhibit "F"** is a copy of Saunders' curriculum vitae, apparently dating from a time after he was hired by MCFD in 1996 but before he was transferred to Kelowna on April 1, 2001. The curriculum vitae reiterates that Saunders obtained a Bachelor of Arts in Psychology from the University of Manitoba in 1992 and a Bachelor in Social Work from the University of Manitoba in 1994.

6. Attached as **Exhibit "G"** is a copy of a transfer letter dated November 18, 2002. The transfer letter confirms that Saunders was laterally transferred to MCFD's Aboriginal Services Office in Kelowna effective November 18, 2002.

7. Attached as **Exhibit "H"** is a copy of a letter of reprimand dated December 22, 2004, issued by the Province to Saunders. The letter of reprimand was part of Saunders' employment file and was in the possession of the Province. The letter of reprimand concludes that Saunders engaged in conduct that was perceived to involve a conflict of interest. The letter states, "[i]n your specific situation, a perceived conflict of interest results from: (1). Personally with holding a client's money and (2). Deliberately not involving a third party to oversee a client's financial transactions [sic]". I am advised by Jason Gratl that he was informed by

counsel for the Province that no other documents dealing with this reprimand were located by the Province.

8. Attached as **Exhibit "I"** is a copy of Saunders' annual employment review dated April 26, 2005. Under "employee's weak points or areas where improvement is needed" it is stated that Saunders "[n]eeds to be conscious of how he comes across in meeting (ie. can be seen to be disinterested or not showing appropriate sensitivity to the Aboriginal culture/history) [sic]".

9. In March of 2019, our law firm received a telephone call from a person who provided information to Jason Gratl on the basis that his or her identity and information tending to reveal his or her identity would not be revealed publicly. The caller advised that he or she was aware that Saunders had forged his University of Manitoba diplomas and had never graduated a degree program from the University of Manitoba.

10. Mr. Gratl advised Darcie Suntjens, counsel for the Province, of the information provided to him by the anonymous caller. Ms. Suntjens apparently relayed the information to persons within the Ministry of Children and Family Development, and the Ministry made inquiries with the University of Manitoba.

11. Attached as **Exhibit "J"** is an email string from Gayle Gordon, an Associate Registrar of the University of Manitoba, which confirms that Saunders did not graduate University of Manitoba with a Bachelor of Arts in Psychology or a Bachelor of Social Work, and what Saunders purported was his Bachelor of Social Work degree is a forgery.

12. I am advised by Jason Gratl and believe that on June 15, 2020, he was advised by Darcie Suntjens that MCFD estimates the number of class members at 102, of whom 17 are not Indigenous. The size of the Indigenous Sub-class is estimated at 85 members.

13. I am advised by Jason Gratl and believe that interviews conducted by Mr. Gratl of potential class members and review of MCFD files for individual claimants by himself, counsel for the Province and comprehensive reviews by experienced social workers within MCFD yielded clusters of common experiences for groups of class members that resulted from Riley Saunders' acts and omissions.

14. I am advised by Jason Gratl that the Basic Payment of $25,000 to every class member without proof of loss is reflective of a pattern of general neglect and mistreatment of all class members by Riley Saunders, meriting an award for non-pecuniary loss.

15. I am advised by Jason Gratl that the additional Basic Payment of $44,000 to each Indigenous Sub-class member is reflective of a pattern by Saunders of neglect of

his duty to support Indigenous children to learn about and practice the child's Indigenous traditions, customs and language and to belong to the child's Indigenous community.

16. The frequency of repetition of common experiences allowed for the creation of categories of elevated damages in the settlement agreement:

    a. Homelessness. Riley Saunders misappropriated funds allocated for payment of rent by class members, which had the effect of rendering them homeless or perpetuating their homelessness. In addition to misappropriating funds, Riley Saunders failed to extend supports, including counselling, mental health and addictions support to class members he knew to be homeless;

    b. Sexual assault and/or sexual exploitation. Many class members who were inadequately supported and sheltered experienced sexual assault and sexual exploitation as a result of Riley Saunders' neglect and misappropriation;

    c. Physical assault. Many class members who were inadequately supported and sheltered experienced physical assault as a result of Riley Saunders' neglect and misappropriation;

    d. Delayed education. Many class members' education was delayed as a result of Riley Saunders' neglect and misappropriation; and

    e. Symptoms of self-harm, trauma or substance use disorder. Many class members experienced self-harm, trauma or developed substance use disorder as a result of Riley Saunders' neglect and misappropriation.

17. I am advised by Jason Gratl and believe that the cost of prosecuting a civil claim for physical or psychological injury against Her Majesty the Queen in Right of the Province of British Columbia (MCFD) is prohibitive. People who were seriously abused as foster children are often financially strained and legal representation is generally funded by means of contingent fee agreements.

18. Claims that allege negligence by social workers usually require expert opinion evidence dealing with the standard of care for social workers: *J.P. v. British Columbia (Children and Family Development)*, 2017 BCCA 308 (CanLII) at paras.368-370. I am advised by Toby Rauch-Davis, associate counsel at Gratl & Company, that he has obtained estimates for expert opinion reports dealing with the standard of care for social workers and the estimates per case range from approximately $14,000.00 to $30,000.00 per report, largely because each report requires a comprehensive file review. Mr. Rauch-Davis also advised me that experts with sufficient experience, training and familiarity with MCFD policy, who do not work for MCFD and are available to prepare a report, are challenging to locate.

19. I know of no facts, and Mr. Gratl advised me that he knows of no facts, material to the application that have not been disclosed in this affidavit or in any affidavits previously filed in the proceeding.

20. Attached as **Exhibit "K"** is a copy of an Aboriginal Financial Officers Association of British Columbia ("AFOA BC") proposal for financial literacy workshops that sets out the scope of services anticipated to be provided for class members, subject to settlement approval.

21. I am informed by Mr. Gratl that he is coordinating the time and location of the workshops with Wendy Ham, the Executive Director of AFOA BC, to coordinate delivery of Basic Payment cheques with the workshops, to encourage workshop attendance. Mr. Gratl intends that Basic Payment cheques will be delivered by legal counsel at Gratl & Company to provide an opportunity to provide legal advice to class members about opting out of the settlement agreement and making application for elevated damages pursuant to the settlement agreement.

AFFIRMED BEFORE ME at the City of Vancouver, in the Province of British Columbia, this 13th day of July, 2020)

_____)
A Commissioner for taking Affidavits within British Columbia.

_____
SHAUNA STEWART

This Affidavit is Commissioned by Jason Gratl of Gratl & Company, Barristers and Solicitors
511-55 East Cordova Street, Vancouver, BC V6A 0A5 Tel: 604-694-1919 Fax: 604-608-1919

It should be noted that this is a growth position. You will be eligible for appointment as a Social Program Officer 3 upon successful completion of one (1) year of work experience as a Social Program Officer 1. If you meet the required academic and work experience, your district supervisor will complete an evaluation form with a recommendation to the area manager.

The minimum eligibility factor to make application for a lateral transfer on a posted competition, from one geographic location to another, is twenty-four months (24) as a regular at the former location. Any leaves of absence over ten (10) working days duration may be added to the twenty-four (24) month service requirement.

To prepare you for the responsibilities of the position, you are required to participate in a core training program. You will begin the training term in the district office, to which you have been assigned, and will be registered in the earliest available central training module. Your District Supervisor will confirm the dates of attendance. Any questions regarding this training should be directed to your supervisor.

Mike Kennedy will contact you to confirm your acceptance of this position and to discuss appointment arrangements or you may contact Mike in Prince George at 604-565-6220.

Congratulation on your achievement in this competition. We wish you success with your move and look forward to you joining the Ministry of Social Services.

In order to formally acknowledge your acceptance of this position, please sign the attached copy of this letter and return to my attention.

I have read, understand and accept the terms and conditions of the above offer.

Sept. 27/96	
DATE	SIGNATURE

Yours truly,

for:
David McDowell
Manager, Human Resources
Region J - The North

encls: Are You Moving Booklet
Standard of Conduct Pamphlet
Copy of Letter

pc: Mike Kennedy, Area Manager, J4A CF&CS
Marcia Wilson, District Supervisor, J44
Cathy, Payroll, J4A, 2340
Competition File / Personnel File / PMS File

:nam

3:37pm

This is Exhibit " A " referred to in the affidavit of SHANNA STEWART sworn before me at VANCOUVER this 13 day of JULY 2020

A Commissioner for taking Affidavits for British Columbia

This is Exhibit " B " referred to in the
affidavit of SHANNA STEWART
sworn before me at VANCOUVER
this 13 day of JULY 2020

A Commissioner for taking Affidavits
for British Columbia

Province of British Columbia

EMPLOYMENT APPLICATION

INSTRUCTIONS:

- Please complete all sections as thoroughly as possible, even if you are attaching a resume. This application will introduce us to your experience, education and skills. It is necessary to provide complete information as this will be used to determine eligibility. Past work performance checks will be conducted prior to appointment. All information provided to us will be considered confidential in the competition process.
- Please submit a ***separate*** application for each position / competition. This application must be received at the appropriate closing location by the date indicated in the advertisement. All candidates will be notified by mail of the competition outcome.

OFFICE USE ONLY

DATE RECEIVED

POSITION INFORMATION

COMPETITION NO.	POSITION TITLE, MINISTRY AND LOCATION	CLOSING LOCATION	COMPETITION CLOSING DATE Y M D
	Ministry for Children & Families		

FOR GENERAL APPLICATION		Full time	Part time	Job sharing	TYPE(S) OF POSITION - please describe
Indicate (✓) the type of employment you are requesting	PERMANENT	☑	☐	☐	Social Worker.
	TEMPORARY	☐	☐		

PERSONAL INFORMATION

LAST NAME	FIRST NAME	INITIALS	SOCIAL INSURANCE NO.	RESIDENCE TELEPHONE NO.
Saunders	Riley	R.	6 3 8 4 7 5 8 5 5	BUSINESS TELEPHONE NO. - or message: 787-3455.

MAILING ADDRESS	CITY	PROVINCE	POSTAL CODE
102-10003-110 Ave.	Fort St. John	B.C.	V 1 J 6 M 7

CITIZENSHIP STATUS - documentation may be required	Is your ability to perform the duties of the position you are applying for likely to be affected by a current or previous illness or disability?	Is your age at least 15 years and less than 65 years?
☑ CANADIAN CITIZEN / PERMANENT RESIDENT ☐ OTHER - please specify	☑ NO ☐ YES - please explain on separate page	☑ YES ☐ NO

CURRENT EMPLOYMENT STATUS

Are you currently an employee in the Public Service of British Columbia?

☐ NO ☐ YES - If yes, indicate (✓) status ▶ ☐ REGULAR ☐ ORDER IN COUNCIL ☐ AUXILIARY

Are you willing to work anywhere in the Province?

☐ NO ☐ YES - list locations preferred ▶

IF AUXILIARY, provide start date and the number of days/hours you expect to have worked up to the closing date of the competition.

START DATE Y M D | NO. OF DAYS/HOURS

EDUCATION & TRAINING

Please describe secondary, post secondary, courses and training which have given you work related knowledge and skills. Start with highest level achieved and specify the degrees, certificates or diplomas completed. Official documentation may be required. Attach a separate page if necessary.

NAME OF INSTITUTION OR ORGANIZATION	LOCATION	DATES OF ATTENDANCE	AREA OF STUDY / COURSE	GRADE / CERTIFICATION / DIPLOMA / DEGREE	(✓) Completed? YES	NO
University of Man.	Winnipeg.	92-94	B. Social Work.	Degree.	✓	
University of Man.	Winnipeg.	88-92	HR+S.	Degree	✓	

ASSOCIATIONS / PROFESSIONAL AFFILIATIONS

List any active memberships or registrations in a professional or career related organization or society.

WORK HISTORY

Have you previously been employed in the Public Service of British Columbia ? ☐ NO ☐ YES, indicate ministry(ies):

Beginning with your most RECENT experience, describe your work history. You may wish to include relevant volunteer positions. In the area for "Duties and Skills" describe the ***major*** duties and skills acquired / used as they relate to the position you are applying for. If any references have known you by a previous name, please specify. Attach additional pages if required.

EMPLOYER AND LOCATION			FROM (Y M D)	TO (Y M D)
Sara Riel. Winnipeg. Manitoba.			95 11 01	96 10 24
SUPERVISOR - Reference	**SUPERVISOR'S TELEPHONE NO.**	**REASON FOR LEAVING**		
Bob Minden.	237-9263	Current Position.		
POSITION	**JOB CLASSIFICATION - If applicable**	**SALARY**	**NO. OF PEOPLE SUPERVISED - If applicable**	
Rehab. Counsellor.		20000/Annual		

DUTIES AND SKILLS

EMPLOYER AND LOCATION			FROM (Y M D)	TO (Y M D)
SUPERVISOR - Reference	**SUPERVISOR'S TELEPHONE NO.**	**REASON FOR LEAVING**		
POSITION	**JOB CLASSIFICATION - If applicable**	**SALARY**	**NO. OF PEOPLE SUPERVISED - If applicable**	

DUTIES AND SKILLS

EMPLOYER AND LOCATION			FROM (Y M D)	TO (Y M D)
SUPERVISOR - Reference	**SUPERVISOR'S TELEPHONE NO.**	**REASON FOR LEAVING**		
POSITION	**JOB CLASSIFICATION - If applicable**	**SALARY**	**NO. OF PEOPLE SUPERVISED - If applicable**	

DUTIES AND SKILLS

EMPLOYER AND LOCATION			FROM (Y M D)	TO (Y M D)
SUPERVISOR - Reference	**SUPERVISOR'S TELEPHONE NO.**	**REASON FOR LEAVING**		
POSITION	**JOB CLASSIFICATION - If applicable**	**SALARY**	**NO. OF PEOPLE SUPERVISED - If applicable**	

DUTIES AND SKILLS

SKILLS / EXPERIENCE

Check (✓) areas of skills / experience that you have which are relevant to the position you are applying for and attach any appropriate documentation.

	NET SPEED	NO.OF MONTHS EXPERIENCE	LIST EQUIPMENT
☐ TYPING			
☐ DICTATING EQUIPMENT			
☐ SHORTHAND			
☐ WORD PROCESSING			
☐ DATA ENTRY			
☐ COMPUTER SYSTEM SOFTWARE			LIST SOFTWARE
☐ COMPUTER SYSTEM HARDWARE			LIST HARDWARE

SKILLS / ACHIEVEMENTS

Briefly summarize your knowledge and major skills / achievements which relate to the advertised position or if this is a general application, to the position(s) that interests you. You may use this space to enter other information you would like us to consider in reviewing your application. Attach additional pages if required.

APPLICATION CONFIRMATION

The section below may be mailed or given to you as a confirmation that our office has received your application.
This confirmation is optional, and will be provided to you ***only if you have completed it.***

PLEASE CONTINUE ON PAGE 4

Province of British Columbia

Freedom of Information and Protection of Privacy Act – The personal information requested on this form is collected under the authority and used for the purposes of administering the *Public Service Act*. Questions about how the *Freedom of Information and Protection of Privacy Act* applies to the personal information collected on this form can be directed to the Manager, Staffing, (387-0444), 548 Michigan Street, Victoria, B.C. V8V 1S3.

Receipt of this section confirms our office has received your application.

Enter your name and complete address on the lines below. Please include postal code.

NAME: Riley Saunders.
ADDRESS: 100-10003-110 Ave.
CITY/ PROV.: Fort St. John. B.C.
POSTAL CODE: V1J 6M7

For your reference, please complete the following information.

COMPETITION NO.	
MINISTRY NAME	
POSITION TITLE	
COMPETITION CLOSING DATE	

DRIVER'S LICENSE INFORMATION

Provide the following information if relevant to the position you are applying for or if this is a general application.

List class(es) of valid driver's license.	List all restrictions which prevent licensing.	If required, do you have access to a vehicle for use on government business? ☐ YES ☐ NO

REFERENCES

Reference checks may be conducted to assess your past work performance and may include checks of attendance records.

In addition to the references identified in the "Work History" section, you may wish to provide further references. If any references have known you by a previous name, please specify.

NAME	TELEPHONE	RELATIONSHIP	NO. OF YEARS KNOWN

Do you wish to be consulted prior to our conducting a reference check with your past or present employers?

PAST EMPLOYERS ☐ YES ☐ NO | PRESENT EMPLOYER ☐ YES ☐ NO

ADDITIONAL INFORMATION

Please provide the following information if you have a direct relative* or share the same household with an individual employed in the Public Service of British Columbia, who may be in a supervisory / subordinate role to the advertised position.

* *Parent, spouse, common law relation, brother, sister, grandparent, son or daughter.*

NAME	MINISTRY	POSITION

CERTIFICATION

Note: Please read carefully before signing. This application is not valid unless signed by the applicant.

I certify that the information provided in this application or attachments / resume is true and complete. I understand that if any information in this application or attachments / resume is found to be untrue or incomplete, my application may be rejected or I may be dismissed in the event that I am the successful applicant.

SIGNATURE

DATE SIGNED Y M D

96 11 04

Thank you for your interest in employment opportunities with the Province of British Columbia

This is Exhibit" C "referred to in the
affidavit of SHANNA STEWART
sworn before me at VANCOUVER
this 13 day of July 20 20

A Commissioner for taking Affidavits
for British Columbia

The University of Manitoba

on the recommendation of the Senate
has conferred on

Robert Riley Saunders

who has completed the prescribed course of study and has passed the required examinations
the Degree of

Bachelor of Social Work

with all the rights and privileges thereto appertaining.

In Testimony Whereof The University of Manitoba has caused its seal to be affixed hereto attested by the signatures of its proper officers in that behalf this twentieth day of October, one thousand nine hundred and ninety-four.

Chancellor

President

Chairman, Board of Governors

Dean, Faculty of Social Work

SEP-27-1996 09:35 SARA RIEL INC 204 233 2564 P.03/03
TOTAL P.03
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8

Public Service
COMMISSION OF BRITISH COLUMBIA

MAR 2 0 1999
NORTHERN REGION
RECEIVED

EMPLOYEE APPRAISAL FORM

INSTRUCTIONS

This form is to be completed in DUPLICATE by the *direct* supervisor of the employee being appraised. A check mark (√) is to be placed in the appropriate column. If, due to the nature of the duties, certain factors do not apply, check the N/A column. Refer to the "Supervisor's Guide for Appraising Employee Performance."

Name (print) R. RILEY SAUNDERS Position SOCIAL WORKER

Branch FIELD SERVICES Ministry MCF Location FORT ST. JOHN

CODE: N/A—NOT APPLICABLE; E—EXCELLENT; G—GOOD; S—SATISFACTORY; B—BORDERLINE; P—POOR

	N/A	E	G	S	B	P
1. QUALITY OF WORK						
Knowledge of the job			X			
Ability to plan work			X			
Accuracy in work performance			X			
2. QUANTITY OF WORK						
Ability to complete work on time				X		
Volume of work completed			X			
3. EFFECTIVENESS						
Ability to carry out instructions			X			
Ability to work independently			X			
Ability to work under pressure			X			
Ability to deal adequately in an emergency			X			
Ability to adapt to new procedures			X			
4. ATTITUDE						
Attitude to the job			X			
Attitude toward supervisor			X			
Attitude toward the Ministry				X		
5. PUBLIC RELATIONS						
Appearance on duty			X			
Manner toward the public			X			
6. WORK HABITS						
Attendance record			X			
General health			X			
Co-operation			X			
Safety attitude and practise				X		

COMMENTS *(related to Section 1 to 6)* SEE ADDENDUM

This is Exhibit "D" referred to in the affidavit of SHANNA STEWART sworn before me at VANCOUVER this 13 day of JUNE 20 20

A Commissioner for taking Affidavits for British Columbia

7. SUPERVISORY ABILITY

(To be completed when the employee holds a supervisory position.)

	N/A	E	G	S	B	P
Ability to control a working group						
Ability to develop teamwork						
Ability to delegate to subordinates						
Ability to assess performance of staff						
Ability to train staff						

COMMENTS *(related to Section 7)*

A. Considering all the points in this Employee Appraisal, is this employee performing duties of the position adequately?

YES. If no, would the employee be better-suited to another type of work? _____
(Yes or No.)

If yes, what type of work? _____

B. Do you consider the employee suitable for promotion?

(*a*) at this time ☒
(*b*) sometime in the future ☐

C. Is the employee enrolled in any training programs? NO. If so, what course? _____

D. This employee's strong points are COMMUNICATES CLEARLY, WORKS HARD, SUPPORTIVE OF NEW STAFF

E. This employee's weak points, or areas where improvement is needed, are FRUSTRATES SOMEWHAT EASILY WITH RESISTANT CLIENTS

How long has this employee been working under you? 1 year & 9 months

RECOMMENDATIONS: ☐ 1. Withhold merit increase
☐ 2. Confirm appointment. Effective date _____
☒ 3. Other (specify) RECLASSIFICATION TO SPO4

Signature of rater _____ Position District Supervisor Date 99 MAR 23

I have read and accept this appraisal _____ Date March 23/99
(Signature of employee)

I have read and disagree with this appraisal _____ Date _____
(Signature of employee)

Comments of senior officer _____

Signature _____ Position _____ Date _____

Comments of ministry personnel officer _____

_____ *Signature* _____ Date 3/29/99

Has the employee been advised of any change in "Recommendations" made by senior officers? _____

Comments of Public Service Commission _____

Signature _____ Date _____
(Director of Finance and Administration)

ADDENDUM
R. Riley Saunders

Riley Saunders began his employment with the Ministry for Children and Families on November 4, 1996. He has completed all of the required training, has a Bachelor of Social Work and is therefore eligible to be reclassified to SPO4.

QUALITY OF WORK

Riley has a good working knowledge of the legislation and policies under which a social worker practices. I would rate Riley's ability to plan work at the low end of good. While he understands the requirements, Riley tends to become frustrated with resistant clients, including children, and finds it difficult to continue planning for them. He is open to direction and suggestion, however, and will follow through. Court documentation is done accurately and on time.

QUANTITY OF WORK

Riley manages a caseload which generally ranges between 35 and 45 files. This is a very large and busy caseload. Given the caseload size, Riley has some difficulty in keeping up with file documentation but this is to be expected. He responds well to being given time frames in which to have certain work completed and this is being done during supervision time.

EFFECTIVENESS

Riley carries out instructions and adapts to new procedures well. Now that he has another year of experience, he is more confident in his case management and responds well under pressure or in an emergency. Riley has a very clear communication style. While somewhat blunt at times, his clients fully understand his concerns and expectations. This, for the most part, is appreciated by all who deal with Riley.

ATTITUDE, PUBLIC RELATIONS, WORK HABITS

Riley shows a great deal of concern for his clients and works hard to complete tasks, often meeting with clients after hours to accommodate their needs.

Riley is very supportive of new workers and will assist them in learning how to use the computer, getting to know community partners, etc. He responds well to direction by his supervisor and consults with his supervisor appropriately. In general, Riley gets along well with all of the staff.

I recommend that Riley be reclassified to SPO4 at this time.

11

Supervisor's Evaluation:
Appointment To
Senior Practitioner Level

Employee Name:	Riley Saunders
Date:	March 19, 1999
District Supervisor Name:	Marcia Wilson
Date:	March 19, 1999

Expertise in one of the following specialized service areas:
Protection/Parenting; Adoption; Services to Street Children;
Child Welfare Resources; MH-Adults;
MH-Children, MH-Resources, Special Needs Day Care.

Specialized Service Area:
Guardianship, Family Service

		Comprehensive Knowledge	
		Meets Requirements	Doesn't Meet Requirements
1. Comprehensive Knowledge of:			
A) relevant Acts, Regulations, Mandates, Policies, Procedures, Statutory Duties (e.g. guardianship).	A)	X	
B) developmental, behavioral, interpersonal, family, socio-economic, and cultural factors applicable to the client population being served.	B)	X	
C) specialized assessments and intervention methodologies applicable to the client population being served.	C)	X	
D) role of Ministry social worker responsibilities and accountabilities to Ministry, clients, public and other organizations.	D)	X	
E) resources and other organizations involved in identifying or serving the client population	E)	X	

...2

2. Skills and Ability

Advanced application of skills and abilities in the following generic social work functions:

		Skills & Abilities Advanced Application	
		Meets Requirements	Doesn't Meet Requirements
A) information gathering/investigation	A)	X	
B) assessment	B)	X	
C) referrals	C)	X	
D) crisis intervention	D)	X	
E) formulating service plans	E)	X	
F) counselling	F)	X	
G) case management	G)	X	
H) determine eligibility for programs or benefits	H)	X	
I) management of court or other Tribunal related processes	I)	X	
J) resource management - development, maintenance and evaluations	J)	X	
K) case monitoring/case evaluation	K)	X	
L) problem solving	L)	X	

...3

	Demonstrated Ability	
	Meets Requirements	Doesn't Meet Requirements
3. Communication		
A) Application of communication skills in clearly articulating facts, assessments, plans, interventions, outcomes in:		
i) written form (documents, recording, reports); A)i	X	
ii) verbal form (conferences, case reviews); A)ii	X	
B) representing Ministry to the community including community education; B)	X	
C) Ministry and other agency case consultations; maintaining positive and productive relationships. C)	X	

	Meets Requirements	Doesn't Meet Requirements
4. Management of Workload		
A) managing time (setting priorities, meeting deadlines, etc); A)	X	
B) adapting to changing priorities; B)	X	
C) managing stress; C)	X	
D) application of resources to objectives and priorities. D)	X	

...4

	Accepts & Demonstrates Professional Responsibility/ Commitment		
		YES	NO
5. **Professional Responsibility**			
A) Respect fo client dignity and maximum client self determintion and independence;	A)	X	
B) respect for confidentiality	B)	X	
C) Commitment to ongoing professional development (self-directed learning, capacity to critique practice, self awareness)	B)	X	
D) Commitment to development of social work practice, by related research and policy review	D)	X	
E) Personal conduct consistent with authority and responsibility	E)	X	
F) Commitment to, support for and participation in orientation and training of peers including instruction and supervision of students.	F)	X	

DISTRICT SUPERVISOR COMMENTS

Recommended to Senior Practitioner

YES	NO
YES	

Signature: [signature]

Date: March 19, 1999

EMPLOYER COMMENTS

Signature: [signature]

Date: March 23/99

 15

BRITISH COLUMBIA

This is Exhibit" E "referred to in the affidavit of SHAUNA STEWART sworn before me at VANCOUVER this 13 day of JULY 20 20

A Commissioner for taking Affidavits for British Columbia

March 29, 2001

Robert "Riley" Saunders
8608 – 90th Street
Fort St. John, BC V1J 4R5

Dear Riley Saunders:

RE: Transfer Notification
Child Protection Worker
Ministry for Children and Families – Okanagan Region

It is my pleasure to offer you the position of float Child Protection Worker on the Kelowna Child Protection Team. You will be advised of the start date when it has been determined.

Your salary and classification remain the same.

Please note the following terms and conditions of employment. You are required to:

- possess and maintain a valid BC driver's license, and
- have the use of a private vehicle on an expense account basis, as required, to perform your duties.

Please note that the minimum eligibility factor to make application for a lateral transfer from one geographic location to another, is two (2) years at the former location.

Enclosed is a copy of the pamphlet "Standards of Conduct for Public Service Employees." By accepting this position, you confirm that you have read and agree to abide by these standards.

I have also enclosed a Reimbursement of Expenses package which outlines the expenses paid by the Ministry for your move to this position.

Your supervisor will be Norine Clinkard, and she can be contacted at (250) 861-7271.

.../2

Ministry for Children & Families
Human Resource Services
Okanagan Region
Mailing Address:
#402-1726 Dolphin Ave.
Kelowna, BC V1Y 9R9
Telephone: (250) 470-0868
Facsimile: (250) 470-0870

I would appreciate receiving your confirmation of acceptance of this position by a signed copy of this letter being returned directly to me.

I wish you success in your new position.

Yours truly,

K.E. Pilatzke

Kate Pilatzke,
Regional Human Resource Services Advisor

KP/su

Enclosures – Standards of Conduct pamphlet
Reimbursement of Expenses package

cc Rick Childerhose, Regional Executive Director, DBA
Glenn Moffatt, Child Protection Manager, DDA
Norine Clinkard, Team Leader, DDB
Judy Schuster, Human Resource Services Manager, Northern Region
Payroll
H.R. File

I accept the terms and conditions of this offer of employment.

R. Saunders

Riley Saunders

May 9/2001

Date

Ministry for Children & Families
Human Resource Services
Okanagan Region
Mailing Address:
#402-1726 Dolphin Ave.
Kelowna, BC V1Y 9R9
Telephone: (250) 470-0868
Facsimile: (250) 470-0870

Robert "Riley" Saunders
8608-90th St.
Fort St. John, British Columbia
V1J 4R5
(250) 787-5073 (Home)
(250) 787-3453 (Work)
email: Robert.Saunders@gems6.gov.bc.ca

This is Exhibit" F "referred to in the affidavit of SHAUNA STEWART sworn before me at VANCOUVER this 13 day of JULY 2020

A Commissioner for taking Affidavits for British Columbia

Employment Experience

Child Protection Social Worker
Ministry for Children and Families, Fort St. John British Columbia
November 1996 – Present

Duties and Responsibilities:

- Assessing and Investigating Child Protection Reports
- Assessing current and future risk to children and developing plans to ensure safety.
- Apprehension of children from unsuitable families.
- Managing a child protection caseload and providing family service.
- Providing testimony in court proceedings.
- Collaborating with other service providers in order to provide a multi-disciplinary service to children and families.
- Carry out guardianship responsiblities for children in care
- Provide a range of specialized services in accordance with ministry policy and legislation.

Acting District Supervisor
Ministry for Children and Families, Fort St. John, British Columbia
(Over the course of the past 4 years, I have been asked to supervise the Family Service Team in Fort St. John on numerous occasions, accumulating approximately 6 months of supervisory experience)

Duties and Responsibilities:

- Supervising staff and providing clinical supervision in the assessment and investigation of child protection concerns and provision of family services.
- Managing and providing guidance to staff in case planning and case management.
- Directing the delivery of service within the legislation, policy and Ministry priorities.
- Providing approval for spending based on child and program needs within budget and policy parameters.
- Interfacing and organizing with other ministry teams and community partners to ensure co-ordination and integration of client service.
- Orienting and training new employees to practice, policy and child protection standards.
- Promoting public awareness of services provided by the Ministry, and educating the public to the role of the Ministry.

Rehabilitation Counselor
Sara Riel Inc. Winnipeg, Manitoba
October 1995 – October 1996

Crisis Worker
Main Street Project, Winnipeg, Manitoba
May 1995 – October 1995

Research Assistant
Joint Appointment to the School of Medical Rehabilitation, University of Manitoba and Physiotherapy Department, Health Sciences Center, Winnipeg, Manitoba
September 1994 – June 1995 (term)

Individualized Support Worker
Sturgeon Creek Enterprises, Winnipeg, Manitoba

September 1991- September 1992

Urban Crime and Drug and Alcohol Awareness Coordinator
Victor Play Center, Winnipeg, Manitoba
May 1993- September 1993

Education

Bachelor of Social Work- 1994
University of Manitoba, Winnipeg, Manitoba

Bachelor of Arts in Psychology- 1992
University of Manitoba, Winnipeg, Manitoba

Professional Development, Training and Related workshops

- Suicide Intervention Training – 2000
- Fundamentals of Supervision Training – 2000
- Looking After Children Training – 2000
- Ministry for Children and Families Northern Region Workload Strategy and Initiative Committee – 1999-2000
- Occupational Safety and Health Committee –1999-2000
- Nobody's Perfect/ Ready or Not Parenting course steering committee – 1998-2000
- Advanced Investigative Interviewing Training – 1998
- Risk Assessment Model for Child Protection – 1997
- The Professional Social Work in Child Protection Entrance Program – 1996
- Theory and Practice of Counseling – 1995 (continuing education, University of Manitoba)
- Applications to Individual Therapy - 1995 (continuing education, University of Manitoba)

BRITISH COLUMBIA

This is Exhibit" G "referred to in the
affidavit of SHAUNA STEWART
sworn before me at VANCOUVER
this 13 day of JULY 2020

A Commissioner for taking Affidavits
for British Columbia

November 18, 2002

Riley Saunders
131 Celano Crescent
Kelowna, BC V1V 1S9

Dear Riley Saunders:

RE: Transfer Notification
Social Program Officer 24
Child Protection Worker
Ministry of Children and Family Development – Kelowna

This is to advise you have been transferred to the Central Okanagan Aboriginal Services Office, DCF, in Kelowna effective November 18, 2002.

As this is a transfer, your current rate of pay and classification level continue to apply.

Please note that the minimum eligibility factor to make application for a lateral transfer on a posted competition from one geographical location to another is two (2) years at the former location.

Your supervisor will be Rachel Stoodley and she can be contacted at 491-7025.

I wish you success in your new position.

Yours truly,

KE Mitchell

Kate Mitchell
Regional Human Resource Advisor

cc Doug Hughes, Community Services Manager, DCA
Rachel Stoodley, Team Leader, DCF
Payroll 2118
Personnel File

Ministry of Children & Family Development | *Human Resource Services Okanagan Region* | *Mailing Address: #402-1726 Dolphin Ave. Kelowna, BC V1Y 9R9* | *Telephone: (250) 470-0868 Facsimile: (250) 470-0870*

21

Riley Saunders

BRITISH COLUMBIA

This is Exhibit" H "referred to in the affidavit of SHAUNA STEWART sworn before me at VANCOUVER this 13 day of JULY 2020

A Commissioner for taking Affidavits for British Columbia

December 22, 2004

Dear Riley:

This will confirm that a meeting took place on December 22, 2004 at the MCFD Park Office, Kelowna. Prior to meeting today, you were advised on December 15th to be represented in this meeting by your Union Steward; however, as you have declined this offer, the meeting took place as scheduled.

At this meeting, you admitted that you understood the implications and potential repercussions from your actions regarding a perceived conflict of interest. From the ***Standards of Conduct for Public Service Employees,*** a conflict of interest occurs "when an employees private affairs or financial interests are in conflict, or could result in a perception of conflict, with the employee's duties or responsibilities" in such a way that:

- The employee's ability to act in the public interest could be impaired; or
- The employee's actions or conduct could undermine or compromise:
  - *the public's confidence in the employee's ability to discharge work*
  - *responsibilities*
  - the trust that the public places in the public service.

To continue, a potential conflict of interest is perceived due to "an employee benefits from, or is reasonably perceived by the public to have benefited from, a government transaction over which the employee can influence decisions."

In your specific situation, a perceived conflict of interest results from: (1). Personally with holding a client's money and (2). Deliberately not involving a third party to oversee a client's financial transactions.

.../2

Ministry of Children and Family Development | *Interior Region* | *Mailing Address: #400-1726 Dolphin Ave. Kelowna, BC V1Y 9R9* | *Telephone: (250) 470-0888 Facsimile: (250) 470-0890*

Upon appointment to the public service, employees must manage their workload in a manner that will prevent conflicts of interest, or the perception of conflicts of interest from arising. In other words, conflict must not exist between employees' perceived private interests and the discharge of their public duties.

To impress upon you the seriousness of these matters I am issuing this letter as a written reprimand.

In order to ensure that you accept the currently identified financial procedure of third party usage in client transactions, I will be meeting with your supervisor in the near future to inquire about your level of practice in this area.

You have stated to me that you wish to learn from this experience and I will endeavor to extend you that opportunity.

I must point out that if further breaches of this type occur or your actions clearly establish that I am unable to trust in your decision making responsibilities, and that such breaches and actions warrant disciplinary consequences, you will be subject to further, more severe discipline up to and including dismissal.

Yours truly,

Patti Toleman
Aboriginal Community Services Manager
Okanagan/Kootenays

Cc: Kathy Seagris, Staff Rep, BCGEU
Julie Glover, Team Leader
Personnel File

Ministry of Children and Family Development | *Interior Region* | *Mailing Address: #400-1726 Dolphin Ave. Kelowna, BC V1Y 9R9* | *Telephone: (250) 470-0888 Facsimile: (250) 470-0890*

23

PUBLIC SERVICE
COMMISSION OF BRITISH COLUMBIA

EMPLOYEE APPRAISAL FORM

INSTRUCTIONS

This form is to be completed in DUPLICATE by the *direct* supervisor of the employee being appraised. A check mark (√) is to be placed in the appropriate column. If, due to the nature of the duties, certain factors do not apply, check the N/A column. Refer to the "Supervisor's Guide for Appraising Employee Performance."

Name *Riley Saunders* Position *Guardianship social worker*

Branch *Field Services* Ministry *for Children and Family Development*
Location *Aboriginal Services - 147 Park Road, Kelowna*

CODE: N/A – not applicable; E – excellent; G – good; S – satisfactory; B – borderline; P – poor

	N/A	E	G	S	B	P
1. QUALITY OF WORK						
Knowledge of the job	☐	☒	☐	☐	☐	☐
Ability to plan work	☐	☐	☒	☐	☐	☐
Accuracy in work performance	☐	☐	☒	☐	☐	☐
2. QUANTITY OF WORK						
Ability to complete work on time	☐	☐	☒	☐	☐	☐
Volume of work completed	☐	☐	☒	☐	☐	☐
3. EFFECTIVENESS						
Ability to carry out instructions	☐	☒	☐	☐	☐	☐
Ability to work independently	☐	☐	☒	☐	☐	☐
Ability to work under pressure	☐	☐	☒	☐	☐	☐
Ability to deal adequately in an emergency	☐	☐	☒	☐	☐	☐
Ability to adapt to new procedures	☐	☐	☒	☐	☐	☐
4. ATTITUDE						
Attitude to the job	☐	☐	☒	☐	☐	☐
Attitude toward supervisor	☐	☒	☐	☐	☐	☐
Attitude toward the Ministry	☐	☐	☒	☐	☐	☐
5. PUBLIC RELATIONS						
Appearance on duty	☐	☐	☒	☐	☐	☐
Manner toward the public	☐	☐	☒	☐	☐	☐
6. WORK HABITS						
Attendance record	☐	☐	☒	☐	☐	☐
General health	☐	☐	☒	☐	☐	☐
Co-operation	☐	☐	☒	☐	☐	☐
Safety attitude and practise	☐	☐	☒	☐	☐	☐

Comments (related to Section 1 to 6) *see addendum*

This is Exhibit " 1 " referred to in the affidavit of SHANNA STEWART sworn before me at VANCOUVER this 13 day of July 2020

A Commissioner for taking Affidavits for British Columbia

7. **SUPERVISORY ABILITY**
(to be completed when the employee holds a supervisory position)

	N/A	E	G	S	B	P
Ability to control a working group	☒	☐	☐	☐	☐	☐
Ability to develop teamwork	☒	☐	☐	☐	☐	☐
Ability to delegate to subordinates	☒	☐	☐	☐	☐	☐
Ability to assess performance of staff	☒	☐	☐	☐	☐	☐
Ability to train staff	☒	☐	☐	☐	☐	☐

COMMENTS (related to Section 7)

A. **Considering all the points in this Employee Appraisal, is this employee performing duties of the position adequately?** *yes* **(yes or no) If no, would the employee be better suited to another type of work?** __ **(yes or no) If yes, what type of work?**

B. **Do you consider the employee suitable for promotion? (a) at this time** ☒
(b) sometime in the future ☐

C. **Is the employee enrolled in any training programs?** *none at the moment*
If so, whata course? *Is open to further training especially in relations to the area of Aboriginal Study*.

D. **This employee's strong points are** *good knowledge of the Act., communicates clearly, strong advocate for his clients especially in working with the youth on his caseload, not afraid to speak his mind/opinions, self confidence is strong*

E. **This employee's weak points, or areas where improvement is needed, are** *continue to grow in his understanding of the Aboriginal culture and people.Needs to be conscious of how he comes across in meeting (ie. can be seen to be disinterested or not showing appropriate sensitivity to the Aboriginal culture/history)*

How long has this employee been working under you? *one year*

RECOMMENDATIONS: ☐ **1. Withhold merit increase**
☒ **2. Confirm appointment. Effective date**
☒ **3. Other (specify)** *annual appraisal*

Signature of rater _____ **Position** *District Supervisor* **Date** Apr 08. *2005*

I have read and accept this appraisal _____ **Date** Apr. 26/05
(Signature of employee)

I have read and disagree with this appraisal _____ **Date** _____
(Signature of employee)

Comments of senior officer _____

_____

_____

Signature _____ **Position** ACS Manager **Date** May 2, 2005

Comments of ministry personnel officer _____

_____

_____

Signature K E Mitchell **Date** 5/2/05

Has the employee been advised of any change in "Recommendations" made by senior officers?

_____

Comments of Public Service Commission _____

Signature_____ Date _____
(Director of Finance and Administration)

Addendum to Employee Appraisal
For
Riley Saunders

Riley is currently a Guardianship worker. He returned to work from a paternity leave in the fall of 2004. Upon his return to work he started back as a Protective Family Service worker and has since moved into a Guardianship caseload. Riley has been working under my supervision for the past year and a half.

During the time Riley was responsible for a family service caseload he certainly showed that he has a solid knowledge base in regards to court work and the Act. He works well with legal council and his court preparations are good. An example of Riley's diligence in working for his clients is with [redacted] who was 19 when she transferred to this office. She was in the process of ageing out and had been refused ortho coverage. Riley advocated for her and was successful in getting her ortho paid for. As a Guardianship worker Riley has shown a keenness to learn and works well with the young people he is responsible for. Riley has developed a tracking system for himself to ensure that LAC are done in a timely manner.

Riley has taken on a student this past year and appears to take this responsibility seriously. He enjoys his role as a mentor/teacher and does a good job as such.

Riley would like to be given more opportunities to do acting T/L. He has acted for me on a couple of occasions and is respected by the other workers on the team when he acts. Riley would benefit from being able to take any training that relates to supervision and being a T/L and all that it entails.

Riley has chosen to be on the Aboriginal Services Team. He has attended the five-day Aboriginal Cultural Awareness Training. As with most of this team Riley would continue to benefit from more cultural experiences and training in this area. I would encourage him to take part in any cultural events/opportunities that arise in the community, as it would be a good learning experience and also build on his relationships with the community members.

It has been a pleasure working with Riley this past year and a half. He is a strong worker and an asset to the team.

Supervisors signature — Date: April 08/05

Employee's signature — Date: April 26/05

From: Gayle Gordon <Gayle.Gordon@umanitoba.ca>
Sent: 3/28/2019 11:47:29 AM -0800
To: "Scheiber, Alex MCF:EX" <Alex.1.Scheiber@gov.bc.ca>
Subject: RE: Degree Verification Request

I can confirm that Riley Saunders (DOB March 19, 1970) attended the University of Manitoba but did not earn a degree.

The parchment you sent is a forgery.

This is Exhibit "J" referred to in the affidavit of SHAUNA STEWART sworn before me at VANCOUVER this 13 day of JULY 2020

A Commissioner for taking Affidavits for British Columbia

****

Gayle Gordon, Associate Registrar

University of Manitoba

Winnipeg, MB

(204) 480-1459

From: Scheiber, Alex MCF:EX <Alex.1.Scheiber@gov.bc.ca>
Sent: March 28, 2019 2:36 PM
To: Gayle Gordon <Gayle.Gordon@umanitoba.ca>
Subject: RE: Degree Verification Request

March 19, 1970

From: Gayle Gordon <Gayle.Gordon@umanitoba.ca>
Sent: Thursday, March 28, 2019 12:13 PM
To: Scheiber, Alex MCF:EX <Alex.1.Scheiber@gov.bc.ca>
Subject: RE: Degree Verification Request

Do you have a date of birth?

****

Gayle Gordon, Associate Registrar

University of Manitoba

Winnipeg, MB

(204) 480-1459

From: Scheiber, Alex MCF:EX <Alex.1.Scheiber@gov.bc.ca>
Sent: March 28, 2019 2:08 PM
To: Gayle Gordon <Gayle.Gordon@umanitoba.ca>
Subject: Degree Verification Request

Gayle, please see my urgent question below. I also need to know if Mr. Saunders was ever a student at U of M. I would appreciate you treating my request as high priority as the information is relevant to a criminal investigation and civil claims underway. Feel free to call me at: (250) 508-1252

Alex Scheiber

Deputy Director of Child Welfare

Ministry of Children and Family Development

Victoria, BC

From: Scheiber, Alex MCF:EX
Sent: Thursday, March 28, 2019 11:26 AM
To: 'Robyn Wellman' <Robyn.Wellman@umanitoba.ca>
Cc: Jennifer Ham <Jennifer.Ham@umanitoba.ca>
Subject: RE: Degree Verification Request

Thank you for this information Robyn. This is very concerning. I have attached a copy of the document that Mr. Saunders submitted to this ministry when he applied. Based on the information you have provided, it would appear this document is a forgery. Do you agree?

From: Robyn Wellman <Robyn.Wellman@umanitoba.ca>
Sent: Thursday, March 28, 2019 8:19 AM
To: Scheiber, Alex MCF:EX <Alex.1.Scheiber@gov.bc.ca>

Cc: Jennifer Ham <Jennifer.Ham@umanitoba.ca>
Subject: Re: Degree Verification Request

Good morning Alex.

Thank-you for the information you have provided. Under clause 44(1)(r) of *The Freedom of Information and Protection of Privacy Act*, the University may disclose an individual's personal information without their consent if the disclosure is for law enforcement purposes or crime prevention.

Therefore, the University of Manitoba can provide you with the information you have requested. The University's Registrar's Office completed a search and determined that Mr. Robert Riley Saunders did **not** obtain a BA in Psychology at the UM. Additionally, they determined that Mr. Robert Riley Saunders did **not** obtain a BSW at the UM.

Please let me know if you have any further questions.

Robyn

Robyn Wellman (she/her/elle) | Access and Privacy Coordinator | Access and Privacy Office | Ph: 204-474-9462 | Fax: 204-474-9308

From: Scheiber, Alex MCF:EX <Alex.1.Scheiber@gov.bc.ca>
Sent: March 27, 2019 6:46 PM
To: Robyn Wellman
Cc: Jennifer Ham
Subject: Re: Degree Verification Request

Thank you Robyn. A former social worker with the Ministry of Children and Family Development (MCFD), Mr Robert Riley Saunders, is the subject of a criminal investigation after evidence was revealed in 2018 that he committed fraud by diverting funds for children in care to his own bank account. Since then several civil claims have been filed against Mr Saunders which have yet to be resolved. As Deputy Director of Child Welfare I am leading the ministry's own investigation of this matter and cooperating with RCMP and the Attorney General on the criminal investigation and civil litigation. This is a high profile matter and

you can review extensive media coverage of it.

Recently, the lawyer representing one of the plaintiffs alleged that Mr Saunders had forged his university degree. It is my statutory duty to investigate this latest allegation as it is relevant to the service he provided to children and families over his 23 year career, and potentially the harm he may have caused them. My records show that Mr Saunders obtained his two undergraduate degrees from University of Manitoba: a BA in Psychology in 1992 and a BSW in 1994 (I have a photocopy of this).

I am requesting that the University of Manitoba verify that the above two degrees that Mr Saunders listed on his application for employment exist. In the event I receive evidence that Mr Saunders has forged his degree I will forward this to the RCPM and it will become part of my investigation of harms to children.

Under the current circumstances I have not attempted to obtain Mr Saunders' consent for you to release this information as his whereabouts are unknown and he is unlikely to consent.

Thank you for your cooperation in this matter. Feel free to email or call me if you have further questions.

Alex Scheiber
Deputy Director or Child Welfare
Ministry of Children and Family Development

On Mar 27, 2019, at 2:42 PM, Robyn Wellman <Robyn.Wellman@umanitoba.ca<mailto:Robyn.Wellman@umanitoba.ca>> wrote:

Hi Alex,

Per my voicemail, here is my email address, along with Jennifer Ham's email address. Please provide us with your request in writing, indicating whether or not this request is the result of a legal/law enforcement matter, as well as your official contact information, and then our office will be able to respond to your request based on section 44 of our provincial privacy legislation, The Freedom of Information and Protection of Privacy Act (FIPPA).

As I stated in my voicemail, I will be away the next two days, so please be sure to include Jennifer in your email so that our office can respond during my absence.

If you have any further questions during my absence, please contact Jennifer again at 1-204-474-7559.

Thanks,
Robyn

Robyn Wellman (she/her/elle) | Access and Privacy Coordinator | Access and Privacy Office | ph: 204-474-9462 | fax: 204-474-9308

This is Exhibit" K "referred to in the
affidavit of SHANNA STEWART
sworn before me at VANCOUVER
this 13 day of July 20 20

A Commissioner for taking Affidavits
for British Columbia

AFOA
BRITISH COLUMBIA

AFOA BC Proposal for Financial Literacy workshops for Gratl & Co.

We are pleased to provide this proposal to develop and facilitate a number of Financial Literacy workshops to the recipients awarded settlements through the Class action lawsuit with the Province of BC. As the majority of the recipients live in the Okanagan, locations identified as suitable for these workshops include the Westbank First Nation Elder's Hall in West Kelowna and/or the Kelowna Friendship Society in the city of Kelowna. We expect the attendees will include the recipients of the awarded funds as well as their support network including foster parents, siblings and family. The goals are to provide the recipients with the financial tools necessary to manage their incoming settlement dollars in the present, and to build a sustainable financial skill-set and wisdom that they can draw on throughout their adult lives.

About AFOA BC

Since 1996, Aboriginal Financial Officers Association of BC (AFOA BC) has supported Indigenous people and First Nation Band offices, province-wide, through workshops and tools designed to help them increase their knowledge and competency in financial literacy, financial management, governance, and economic development. We offer annual conferences, regional workshops and educational forums throughout the province.

Our organization was created with the goal of building capacity for Indigenous communities across British Columbia, and we continue today with that vision in mind. With nearly a quarter century of experience, we are the trusted leaders of delivering financial education with integrity, professionalism and honesty.

Audience

We understand there are 112 individuals who will be receiving lump-sum payments (most likely in two installments) of varying amounts. There has been discussion around requiring each of these individuals to attend one of these financial literacy workshops prior to receiving their cheques to ensure they have received some education, tools and best practices on how to make these funds work for them. We also recognize the need to remove some of the obstacles these individuals may face when attempting to open a bank account or invest the funds to support their long-term savings goals.

In order to promote a positive and interactive learning environment where each attendee would receive the attention and support they require from the facilitator, we intend to keep the workshop attendance at a low number with approximately 10-15 attendees at each session. They will be asked to register in advance of the sessions.

Workshops

We are planning a three-hour financial literacy workshop using curriculum already developed and proven successful over a number of years but adapted specifically to this audience. The topics covered will be:

- Banking and bank accounts
- Budgeting

- Investing
- Credit Cards
- Debt & Debt Reduction
- Financial Predators and scams

We will also ensure there is plenty of time for questions and answers, and the presentation will consist of several engaging interactive elements including stories, videos, games, partnering activities, etc. Each partipant will take away a booklet and other materials that can be used for reference thereafter.

After the workshop, there will be an area set up consisting of representation from the following institutions:

- **A bank or credit union** – to provide information regarding account opening requirements, perform account opening on-site, and provide cheque cashing services
- **Service Canada** – to provide information and/or services to those who cannot meet the identification requirements to open a bank account or cash a cheque
- **Credit Counselling Society of BC** (or another partner) – to provide in-depth credit counselling information and support for those who may need it
- **Public Guardian & Trustee of BC –** to support those who wish to keep their distributions with the Trustee
- Other support organizations identified as helpful to reduce barriers

Support staff will also be present to increase the comfort level of attendees and to answer any additional questions as needed. We expect there may be other organizations who have been involved in this process who will also be in attendance, and all support is welcome.

As the workshops will be a ½ day each, we will try to run two per day, one in the morning and one in the afternoon. The agenda for the sessions will be:

- Group 1
  - Continental Breakfast
  - 9am-12pm: Workshop Presentation
  - 12pm-1pm: Lunch
  - 1pm-2:30pm: One-on-one with support institutions
- Group 2
  - 12pm-1pm: Lunch
  - 1pm-4pm: Workshop Presentation
  - 4pm-4:30pm: Break & refreshments
  - 4:30pm-6pm: One-on-one with support institutions

Follow up support

We will also ensure that ongoing support is provided by way of an Indigenous financial advisor/counsellor who will supply continued guidance and support to those attendees who require it and/or for those who cannot attend one of our workshops. This will be facilitated through our offices where we will guide the individual to the support that best suits his or her needs.

Other administrative activities

AFOA BC will provide the following:

- Online registration system for attendees
- Arrange for travel for recipients to attend the workshop
- Coordinate and confirm registrations
- Manage any issues that may arise in the planning and preparatory phases as well as on the days of engagement sessions

Facilitator

We are anticipating we will allocate one facilitator and one facilitator assistant for each workshop (one male and one female) to ensure a safe and inclusive environment. We realize that there may be specific needs of the attendees; therefore, we have selected a facilitator who has extensive experience working with at-risk Indigenous youth, and she is of Indigenous heritage as well. Her knowledge and experience is outlined in the attached bio.

Budget

	Based on 10 sessions
1/2 day Workshop (workshop/venue/catering)*	30,000
Travel for facilitators and staff **	24,240
Travel for recipients ***	12,880
Administration	10,000
Contingency for follow up support	35,000
Total	112,120
GST @ 5%	5,606
	117,726

*cost per workshop including catering, venue, facilitators and administration on-site	$3,000
** travel per person for flights, hotel (three nights), meals and travel time based on two full days per week of workshops (four sessions) & 1/2 day travel each way	$2,020
*** taxi fare based on 40 km trip (return trip to/from venue) (Kelowna taxi: 20 km trip = $50 + tip)	$115

Thank you for the opportunity to put in a proposal for this project. We would be honoured to be able to provide this support for these Indigenous youth and young adults. Our mission is to help First Nation people and communities have a better life and thrive. For any further information or questions please contact me at our office at (604) 925-6370.

Regards,

Wendy Ham CPA, CGA, CAFM
Executive Director, AFOA BC