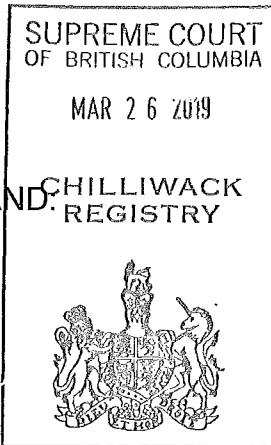


Affidavit #1 of Jacqueline E. M. Thorsell
Made: March 25, 2019

NO. S35152
CHILLIWACK REGISTRY

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:



BARRY NEUFELD

PLAINTIFF

AND: CHILLIWACK
REGISTRY

GLEN HANSMAN

DEFENDANT

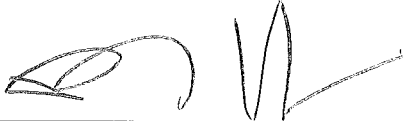
AFFIDAVIT

I, JACQUELINE E. M. THORSELL, Contracted Paralegal, for PAUL E. JAFFE, Barrister and Solicitor of 200 – 100 Park Royal, West Vancouver, British Columbia, AFFIRM THAT:

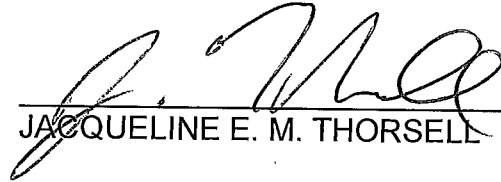
1. I am a contracted paralegal for PAUL E. JAFFE, counsel for the Plaintiff herein, and as such, have personal knowledge of the facts and matters contained herein, save where those facts stated to be based on information and belief, and where so stated, I verily believe them to be true.
2. That, attached hereto and marked as **Exhibit "A"** to this my Affidavit is a copy of the Defendant's List of Documents, dated February 14, 2019.
3. That, attached hereto and marked as **Exhibit "B"** to this my Affidavit is a copy of Mr. Jaffe's letter to Mr. Dafoe, dated February 19, 2019.
4. That, attached hereto and marked as **Exhibit "C"** to this my Affidavit is a copy of Mr. Dafoe's letter to Mr. Jaffe, dated March 5, 2019.
5. That, attached hereto and marked collectively as **Exhibit "D"** to this my Affidavit are copies of the media articles referred to in paragraphs 24, 25, 26, 28, 29, 37, 41 and 43 of the Amended Notice of Civil Claim.

6. That, attached hereto and marked collectively as **Exhibit "E"** to this my Affidavit are copies of three photographs depicting some of the protest signs mentioned at paragraph 33 of the Amended Notice of Civil Claim.

AFFIRMED BEFORE ME at Vancouver,
British Columbia this 25th day of March,
2019.



A Commissioner for taking Affidavits for
and in the Province of British Columbia



JACQUELINE E. M. THORSELL

THE STAR VANCOUVER

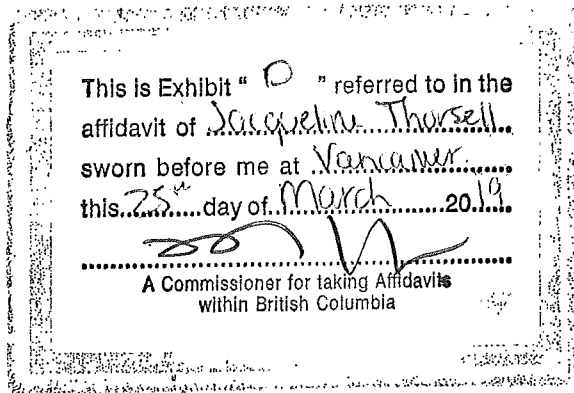
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B.C. teachers' union files human rights complaint against Chilliwack school trustee Barry Neufeld over allegations of transphobia

By TESSA VIKANDER StarMetro Vancouver
Tues., April 10, 2018

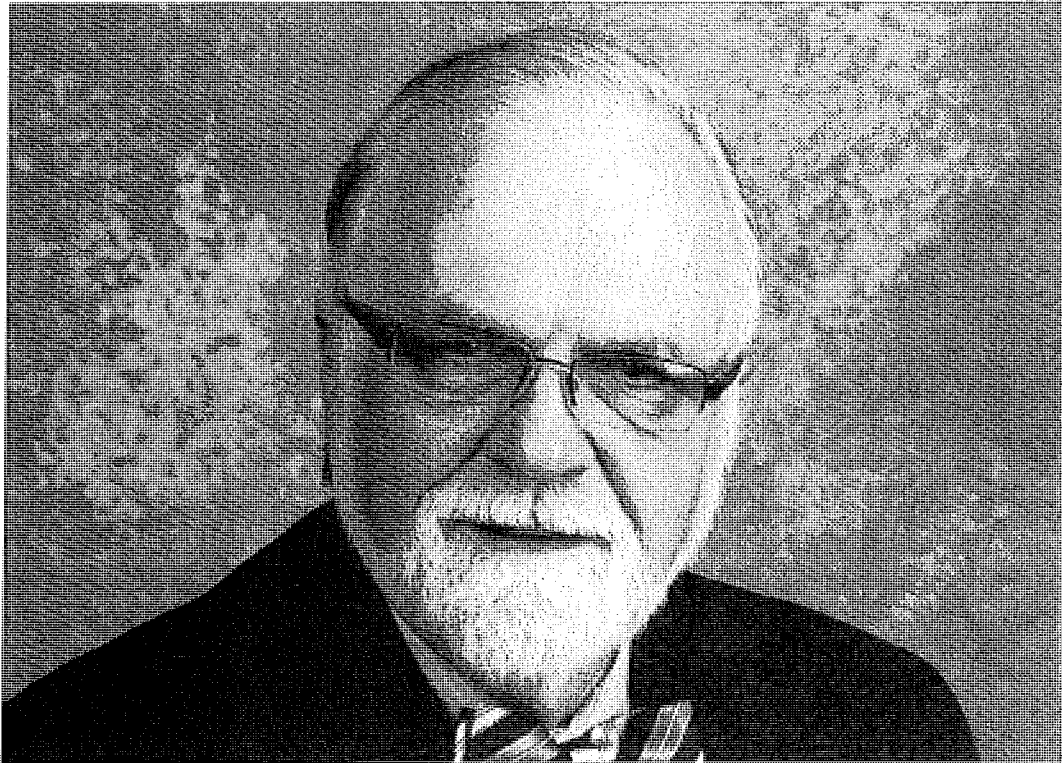
Vancouver — The British Columbia Teachers' Federation has filed a human rights complaint against Chilliwack school trustee Barry Neufeld, alleging his public comments about trans people have created an unsafe work environment for teachers and exposed trans people to hatred.

The BCTF is the second union to go public with a human rights complaint against Neufeld, a trustee who has come under fire for speaking publicly against allowing kids to transition genders, and calling those who support them "child abusers."



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HO Barry Neufeld is a trustee on the Chilliwack School board, who has come under fire over remarks deemed transphobic about transgender children. (COURTESY/CHILLIWACK SCHOOL BOARD)

Glen Hansman, president of the BCTF, said if Neufeld was a teacher, he would be removed from the school system.

“For some reason, because his comments have been largely restricted to transphobic comments ... some are willing to give him a pass on this.”

Reached by phone, Neufeld said he has agreed to not go into any schools until the human rights complaints are resolved.

“One principal said that the transgender kids felt threatened by me ... simply because I have stated that I think that kids should not be rushed into embracing their transgender identity,” Neufeld said.

The complaint alleges Neufeld’s statements about transgender people “have a discriminatory effect on the work environment for all teachers and a particularly discriminatory effect on teachers who are transgender.” His comments, according to the document, have encouraged hateful comments about trans people on his Facebook wall, and thus exposed them to hatred.

As a school board member, Neufeld has a responsibility to uphold the Human Rights Code.

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“This isn’t just a simple matter of (Neufeld) philosophically disagreeing with the concept of transgender or supporting students who are transgender, he is creating a school environment for both our members and students that is discriminatory and hateful,” he said.

The complaint was filed in January and sent to StarMetro Tuesday by the BCTF. It references Neufeld’s social media posts and a public presentation for Culture Guard, a conservative non-profit that fights for the “natural family” and “sanctity of life.”

At a November 21, 2017 Culture Guard meeting, Neufeld said that the school system’s implementation of a new curriculum that teaches students about gender identity and some of the challenges trans people face — called SOGI 1 2 3 — enables “dysfunctional behaviour and thinking patterns” and “the sexual addiction of gender confusion.”

In a later Facebook post, according to the document, Neufeld wrote that he does not want to “give in to the self serving agenda of the LGBTQ+ groups who want to be given priority as the most downtrodden of victims.”

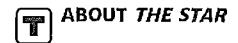
In the complaint, the BCTF also alleges that Neufeld called teachers who support transgender students “child abusers;” Neufeld, however, denies the allegation.

“I never said any such a thing,” Neufeld said.

Neufeld’s public stance against trans kids being allowed to transition — and other alleged homophobic and transphobic comments — has caused widespread opposition with both Education Minister Rob Fleming and the rest of the Chilliwack School Board trustees asking him to step down. Neufeld has not resigned.

In January, Chilliwack’s non-teaching support staff, CUPE Local 411, also filed a human rights complaint against Neufeld. Shana Kirkland, president of the union, said she’s glad the BCTF has followed suit.

“Kudos to them for recognizing that this is a human rights violation,” she said.



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