

Federal Court



Cour fédérale

**Date: 20190705**

**Docket: T-1673-17**

**Citation: 2019 FC 1501**

**Ottawa, Ontario, July 5, 2019**

**PRESENT: The Honourable Mr. Justice Phelan**

**CLASS PROCEEDING**

**BETWEEN:**

**CHERYL TILLER, MARY-ELLEN COPLAND  
AND DAYNA ROACH**

**Plaintiffs**

**and**

**HER MAJESTY THE QUEEN**

**Defendant**

**ORDER**

**WHEREAS** this motion was made by the Plaintiffs, on consent, pursuant to the *Federal Courts Rules*, SOR/98-106;

**AND UPON READING** the Plaintiffs' motion record and supplemental motion record and the Defendant's motion record;

**IT IS ORDERED that:**

1. For the purpose of settlement, this action is certified as a class proceeding against the Defendant, Her Majesty the Queen.
2. The Class is defined as:

**Primary Class Members:** all current and former living Municipal Employees, Regional District Employees, employees of non-profit organizations, volunteers, Commissionaires, Supernumerary Special Constables, consultants, contractors, public service employees, students, members of integrated policing units and persons from outside agencies and police forces who are female or publicly identify as female and who were supervised or managed by the RCMP or who worked in an RCMP controlled workplace during the Class Period, excluding individuals who are primary class members in *Merlo and Davidson v. Her Majesty the Queen*, Federal Court Action Number T-1685-16 and class members in *Ross, Roy, and Satalic v. Her Majesty the Queen*, Federal Court Action Number T-370-17 or *Association des membres de la police montée du Québec inc., Gaétan Delisle, Dupuis, Paul, Lachance, Marc v. HMTQ*, Quebec Superior Court Number 500-06-000820-163. The Class Period is September 16, 1974 to the date the Court certifies the action as a class proceeding.

**Secondary Class Member:** any Child or Spouse of a Primary Class Member who has a derivative Claim, in accordance with applicable family law legislation.

3. The following definitions apply for the purpose of determining who is a Secondary Class Member:

**Child:** a natural or legally adopted child of the Primary Class Member, or a person for whom the Primary Class Member has custody under a court order or domestic contract, or a person toward whom the Primary Class Member has demonstrated a settled intention to treat as a child of her family, except under an arrangement where the child is placed for valuable consideration in a foster home by a person having lawful custody;

**Spouse:**

- a. Either of two persons who are currently married to each other or who have together, in good faith on the part of a person relying on this clause to assert any right, entered into a marriage that is voidable or void, and are living together; or
- b. Either of two persons who are not married to each other and who Cohabit; and

**Cohabit:** to live together in a conjugal relationship outside marriage for a period of not less than three years, or in a relationship of some permanence, if the cohabiting individuals are the natural or adoptive parents of a child.

4. Cheryl Tiller, Mary-Ellen Copland and Dayna Roach are appointed as the Representative Plaintiffs for the Class.
5. The Representative Plaintiffs allege, on behalf of the Class, that the Defendant was negligent and in breach of the *Canadian Charter of Rights and Freedoms*, the *Charter of Human Rights and Freedoms* and the *Civil Code of Quebec* in failing to ensure that Primary Class Members could work in an environment free of gender and sexual orientation based harassment and discrimination.
6. The Class claims the following relief:
  - a. general damages;
  - b. special damages;
  - c. exemplary and punitive damages;
  - d. damages pursuant to the *Canadian Charter of Rights and Freedoms*, Part I of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982 (UK), 1982*, c 11;
  - e. punitive damages pursuant to the *Charter of Human Rights and Freedoms*, CQLR c C12 and the *Civil Code of Quebec*, CQLR c C-1991;
  - f. damages equal to the costs of administering the plan of distribution;
  - g. damages pursuant to the *Family Law Act*, RSO 1990 c F-3 and comparable legislation in other provinces and territories;
  - h. pre-judgment and post-judgment interest; and
  - i. costs.
7. The following issue is certified as a common question of law or fact: Is the Defendant liable to the class?

8. Klein Lawyers LLP and Higgerty Law are appointed as Class Counsel.
9. KCC LLC and RicePoint Administration are appointed as the Notice provider.
10. The long form Notice of Certification and Settlement Approval Hearing is approved substantially in the same form and content as attached as Schedule A. It will be available in both English and French.
11. The publication Notice of Certification and Settlement Approval Hearing is approved substantially in the same form and content as attached as Schedule B. It will be available in both English and French.
12. KCC LLC and RicePoint Administration will distribute the Notice of Certification and Settlement Approval Hearing substantially in the manner set out in the Notice Plan attached at Schedule C.
13. The Defendant will pay KCC LLC and RicePoint Administration the cost of distributing the Notice of Certification and Settlement Approval Hearing in accordance with the Notice Plan, up to a maximum of \$250,000.
14. The Opt Out Form is approved substantially in the same form and content as attached at Schedule D. The Opt Out Form will be available in English and French.
15. Class Members may opt out of the class proceeding by delivering a complete, signed Opt Out Form to Klein Lawyers at the addresses stated in the Opt Out form by no later than 70 days following this Court's approval of the Notice Plan.
16. For the purpose of facilitating notice and to assist in Class Member verification, Canada is required to prepare and provide to KCC LLC and RicePoint Administration, the Assessor and the Administrator a list of potential Primary Class Members who have ever had a Human Resources Management Information System ID with the RCMP and, for

Primary Class members for whom current RCMP email address information is available, their email addresses.

- a. Assessor for the purposes of paragraph 16 means the retired jurist or jurists agreed upon by the parties to assess claims to the settlement; and
  - b. Administrator for the purposes of paragraph 16 means the company chosen by the parties to administer the settlement.
17. For reasons of privacy and efficiency, the addresses for the representative plaintiffs need only refer to the address of Class Counsel.
18. No costs are payable on this motion for certification in accordance with Rule 334.39 of the *Federal Courts Rules*.

“Michael L. Phelan”

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Judge

## **SCHEDULE A**

### **NOTICE OF CERTIFICATION AND SETTLEMENT APPROVAL HEARING**

RCMP Gender and Sexual Orientation Based Harassment and Discrimination Class Action

## **Did you experience gender or sexual orientation-based harassment or discrimination while working with the RCMP?**

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*If you are a female or identify as a female and work or volunteer with the RCMP now or did so in the past, this notice may affect your legal rights. Please read it carefully.*

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A class action lawsuit was initiated by Cheryl Tiller, Mary-Ellen Copland and Dayna Roach against Canada alleging gender and sexual orientation-based harassment and discrimination within the Royal Canadian Mounted Police ("RCMP" or "Defendant"). The RCMP, while not admitting liability, has agreed to a settlement of this lawsuit. A Federal Court class action has been certified on consent for the purpose of settlement.

### **Who is Eligible for the Proposed Settlement?**

You are eligible to participate in the settlement, if you are a member of the class as defined below and have experienced gender or sexual orientation based harassment or discrimination while working or volunteering with the RCMP. The class is defined as:

**Primary Class Members:** current and former living Municipal Employees, Regional District Employees, employees of non-profit organizations, volunteers, Commissionaires, Supernumerary Special Constables, consultants, contractors, public service employees, students, members of integrated policing units and persons from outside agencies and police forces who are female or publicly identify as female and who were supervised or managed by the RCMP or who worked in an RCMP controlled workplace during the Class Period (defined as September 16, 1974 to \*\*\*\*\*, 2019)

\*Excluded from the class are individuals who are primary class members in *Merlo and Davidson v. Her Majesty the Queen*, Federal Court Action Number T-1685-16 and class members in *Ross, Roy, and Satalic v. Her Majesty the Queen*, Federal Court Action Number T-370-17 or *Association des membres de la police montée du Québec inc., Gaëtan Delisle, Dupuis, Paul, Lachance, Marc v. HMTQ*, Quebec Superior Court Number 500-06-000820-163.

**Secondary Class Members:** any Child or Spouse of a Primary Class Member who has a derivative Claim, in accordance with applicable family law legislation.

### **The Terms of the Proposed Settlement**

The settlement provides six levels of compensation ranging from \$10,000 to \$220,000 for Primary Class Members who experienced gender or sexual orientation-based harassment or discrimination while working or volunteering with the RCMP during the Class Period. Compensation is also available for Secondary Class Members where the Primary Class Member's Claim is assessed at either of the two highest severity levels.

### **Your Right to Opt-Out of the Settlement**

If you *do not* wish to participate in the class action and proposed settlement because you wish to retain the right to pursue an individual action, you must mail or deliver by hand a signed Opt-Out Form to Klein Lawyers LLP received or postmarked no later than \*\*\*\*\*, 2019:

Klein Lawyers LLP  
Attn: Whitney Santos  
1385 West 8<sup>th</sup> Avenue, Suite 400  
Vancouver, BC V6H 3V9

If you opt-out, you will not be included in this lawsuit, you will not be bound by the Court's judgement on the settlement, and you will not be eligible for settlement compensation. **File an Opt-Out Form only if you wish to retain the right to pursue an individual action.** The Opt-Out Form can be obtained from Class Counsel and is available on Class Counsel's websites and at [rcmpsettlement.ca](http://rcmpsettlement.ca).

If you have an ongoing lawsuit or other claim for compensation with respect to gender or sexual orientation-based harassment or discrimination you experienced while working or volunteering with the RCMP, and you wish to participate in the proposed class action settlement, you must discontinue your lawsuit or other claim before \*\*\*\*, 2019. If you do not, you will be deemed by s. 334.21(2) of the *Federal Courts Rules* to have opted out of *this* class action. Contact your lawyer to discuss your options.

#### **The Approval Hearing and Your Right to Participate**

A motion to approve the settlement is scheduled to be heard on October 17, 2019 at 9:30 am at the Federal Court in Vancouver, British Columbia at 701 West Georgia Street. Class Counsel will also ask the Court to approve an award of fees and disbursements for their work in achieving the settlement.

If you agree with the proposed settlement, you do not have to do anything at this time. If the Court approves the settlement, a notice will be published setting out the procedures for submitting a Claim to the settlement.

If you disagree with the proposed settlement, you have the right to object. To object, you must mail or deliver by hand a letter to either Klein Lawyers LLP or Higgerty Law at their addresses below. Your objection must be received by Class Counsel by \*\*\*\*\*, 2019. Your letter must include your name, contact information, and a brief statement of the nature and reasons for your objection.

If you are a Class Member, you have the right to participate in the approval hearing by attending the hearing and requesting to speak either in favour or against the settlement or the fees being sought by Class Counsel. The Court may make orders as to the manner, timing and duration of any Class Member submissions at the hearing. If you are a Class Member and wish to participate in the hearing, please contact either Klein Lawyers LLP or Higgerty Law by mail or email at their addresses below and state your intention to participate in the hearing.

#### **What are the Financial Consequences?**

If you remain a Class Member and the settlement is approved by the Court, you will be bound by the terms of the settlement and you will be eligible to file a Claim for compensation. If you opt-out of the settlement and the settlement is approved by the Court, you will not be bound by the terms of the settlement and you will not be eligible to file a Claim for compensation.

The Defendants have agreed to pay Class Counsel's disbursements and are making a contribution toward class counsel fees. Class Counsel will request a further class counsel fee of 15% plus applicable sales tax payable from the compensation awarded to class members under the settlement. The award of class counsel fees is subject to court approval. If approved, 15% of the compensation awarded to Class Members will be deducted from payments to Class Members and paid to Class Counsel as a contribution toward class counsel fees.

#### **Want More Information?**

To obtain a copy of the settlement agreement and the applicable schedules contact Class Counsel at the addresses below.

##### **Klein Lawyers LLP**

Whitney Santos  
[wsantos@callkleinlawyers.com](mailto:wsantos@callkleinlawyers.com)  
1385 West 8<sup>th</sup> Avenue, #400  
Vancouver, BC V6H 3V9  
[www.callkleinlawyers.com](http://www.callkleinlawyers.com)

##### **Higgerty Law**

Connie Luong  
[info@higgertylaw.ca](mailto:info@higgertylaw.ca)  
Millennium Tower, Main Floor  
101, 440 2<sup>nd</sup> Avenue SW  
Calgary, AB T2P 5E9  
[www.higgertylaw.ca](http://www.higgertylaw.ca)

**SCHEDULE B**

**NOTICE OF CERTIFICATION AND SETTLEMENT APPROVAL HEARING**

**Did you experience gender or sexual orientation-based harassment or discrimination while working with the RCMP?**

On June X, 2019 the Federal Court (Canada) certified a class action concerning allegations of gender and sexual orientation-based harassment and discrimination of women working or volunteering with the Royal Canadian Mounted Police ("RCMP"). The settlement provides for six levels of compensation ranging from \$10,000 to \$220,000.

**Who is Eligible for the Proposed Settlement?** Women who experienced gender or sexual orientation- based harassment or discrimination while working or volunteering with the RCMP during the Class Period (September 16, 1974 to \*\*\*\*\*, 2019).\*

**\*\*Primary Class Members\*\*** means current and former living Municipal Employees, Regional District Employees, employees of non-profit organizations, volunteers, Commissionaires, Supernumerary Special Constables, consultants, contractors, public service employees, students, members of integrated policing units and persons from outside agencies and police forces who are female or publicly identify as female and who were supervised or managed by the RCMP or who worked in an RCMP controlled workplace during the Class Period, excluding individuals who are primary class members in *Merlo and Davidson v. Her Majesty the Queen*, Federal Court Action Number T-1685-16 and class members in *Ross, Roy, and Satalic v. Her Majesty the Queen*, Federal Court Action Number T-370-17 or *Association des membres de la police montée du Québec inc., Gaétan Delisle, Dupuis, Paul, Lachance, Marc v. HMTQ*, Quebec Superior Court Number 500-06-000820-163.

**The Approval Hearing and Your Rights**

A motion to approve the settlement is scheduled to be heard on October 17, 2019 at 9:30 am at the Federal Court, Vancouver, BC at 701 West Georgia Street. You may object to the proposed settlement by \*\*\*\*\*, 2019. You may opt-out of the proposed settlement by \*\*\*\*\*, 2019.

For detailed information on how you can participate in the hearing, object to the settlement or opt out of the settlement, visit [rcmpsettlement.ca](http://rcmpsettlement.ca) or contact Class Counsel at the below email addresses.

**More Information?**

For complete details on the proposed settlement, the fees being sought by counsel, opting out and objecting to the settlement, visit [rcmpsettlement.ca](http://rcmpsettlement.ca) or contact Class Counsel:

**Klein Lawyers LLP**  
[www.callkleinlawyers.com](http://www.callkleinlawyers.com)  
[wsantos@callkleinlawyers.com](mailto:wsantos@callkleinlawyers.com)

**Higgerty Law**  
[www.higgertylaw.ca](http://www.higgertylaw.ca)  
[info@higgertylaw.ca](mailto:info@higgertylaw.ca)



## SCHEDULE C



### **RCMP Harassment, Government of Canada Highlights of Notice Program Recommendation**

#### **Relevant Case Experience**

KCC's Legal Notification Services team members have been involved in the design and implementation of several Canadian action notice programs, including: *Ross v. Her Majesty the Queen*, No. T-370-17 (Fed.Ct.); *Brown v. The Attorney General of Canada* (Ont. S.C.J.), No. cv-09-00372025; *Anderson v. The Attorney General of Canada*, No. 2007 01T4955CP (Sup. Ct. NL) and No. 2008NLTD166 (Sup. Ct. NL); and *In re Residential Schools Litig.*, No. 00-CV-192059 (Ont. S.C.J.).

#### **Case Analysis**

The following known factors were considered when determining our recommendation:

1. It is our understanding that there are approximately 41,200 Class Members located throughout Canada, including large cities and rural areas.
2. There are 154 municipalities with Municipal Police Service Agreements.
3. The majority of Class Members are believed to reside in the provinces of British Columbia and Alberta and in Ottawa, Ontario.
4. Almost all Class Members are over the age of 18, and the majority of Class Members are between the ages of 35 and 64.
5. A reasonable effort cannot identify and locate Class Members; therefore, Class Members must be reached through a consumer media campaign.
6. Effective reach and notice content is vital to convey the importance of the information affecting Class members' rights.

#### **Objective**

Notice has been designed to inform Class Members of: 1) the certification of the action as a class proceeding; 2) their right to opt out of the Class; 3) basic details about the proposed settlement; 4) details about legal fees being sought by Class Counsel; 5) the date of the upcoming settlement approval hearing; and 6) Class Members' right to object to the settlement and fees.

To design a notice program that will effectively reach likely Class Members and capture their attention with notice communicated in clear, concise, plain language so that their rights and options may be fully understood.

#### **Target Audience**

Primary Class Members are defined as: current and former living Municipal Employees, Regional District Employees, employees of non-profit organizations, volunteers, Commissionaires, Supernumerary Special Constables, consultants, contractors, public service employees, students, members of integrated policing units and persons from outside agencies and police forces who are female or publicly identify as female and who were supervised or managed by the RCMP or who worked in an RCMP controlled workplace during the Class Period, excluding individuals who are primary class members in *Merlo and Davidson v. Her Majesty the Queen*, Federal Court Action Number T-1685-16 and class members in *Ross, Roy, and Satalic v. Her Majesty the Queen*, Federal Court Action Number T-370-17 or *Association des membres de la police montée du Québec inc., Gaétan Delisle, Dupuis, Paul, Lachance, Marc v. HMTQ*, Quebec Superior Court Number 500-06-000820-163. The Class Period is September 16, 1974 to XX [the date the Court certified this action as a class proceeding].



### Affected Municipalities

There are 154 municipalities throughout Canada with Municipal Police Service Agreements, and therefore affected by the litigation.

| Province/Territory   | Affected Municipalities | % of Total     |
|----------------------|-------------------------|----------------|
| Alberta              | 45                      | 29.22%         |
| British Columbia     | 65                      | 42.21%         |
| Manitoba             | 22                      | 14.29%         |
| New Brunswick        | 7                       | 4.55%          |
| Nova Scotia          | 5                       | 3.25%          |
| Prince Edward Island | 2                       | 1.30%          |
| Saskatchewan         | 8                       | 5.19%          |
| <b>TOTAL</b>         | <b>154</b>              | <b>100.00%</b> |

Together, the provinces of Alberta and British Columbia contain the vast majority (over 70%) of affected municipalities. The media therefore emphasizes outreach to those provinces, while still offering broad, national coverage.

### Target Analysis

Summary and data tables, as well as publications and briefs, published by Statistics Canada were studied and analyzed.

#### ➤ *Select Characteristics of Canada's Population*

#### POPULATION

As of July 1, 2018, there are approximately 29,882,742 Canadian adults 18 years of age or older (Adults 18+).<sup>1</sup> Females comprise 50.7% of the population of Adults 18+ with a total Female Adult 18+ population of 15,143,845, while males make up 49.3% of Adults 18+.

Canadian Population by Age/Sex 18+

| Age            | Total Canada | Male      | Female    |
|----------------|--------------|-----------|-----------|
| 15 to 19 years | 2,106,893    | 1,082,667 | 1,024,226 |
| 20 to 24 years | 2,437,542    | 1,271,388 | 1,166,154 |
| 25 to 29 years | 2,573,476    | 1,324,764 | 1,248,712 |
| 30 to 34 years | 2,550,512    | 1,288,341 | 1,262,171 |
| 35 to 39 years | 2,514,450    | 1,250,324 | 1,264,126 |
| 40 to 44 years | 2,378,927    | 1,176,696 | 1,202,231 |
| 45 to 49 years | 2,405,692    | 1,195,595 | 1,210,097 |

<sup>1</sup> Statistics Canada. Table 17-10-0005-01. Population estimates on July 1<sup>st</sup>, by age and sex. Last modified March 6, 2019.



|                          |                   |                   |                   |
|--------------------------|-------------------|-------------------|-------------------|
| 50 to 54 years           | 2,578,047         | 1,285,508         | 1,292,539         |
| 55 to 59 years           | 2,726,152         | 1,354,975         | 1,371,177         |
| 60 to 64 years           | 2,456,212         | 1,207,653         | 1,248,559         |
| 65 to 69 years           | 2,035,754         | 988,337           | 1,047,417         |
| 70 to 74 years           | 1,625,256         | 779,411           | 845,845           |
| 75 to 79 years           | 1,109,870         | 515,927           | 593,943           |
| 80 to 84 years           | 765,850           | 336,986           | 428,864           |
| 85 to 89 years           | 504,086           | 199,768           | 304,318           |
| 90 to 94 years           | 237,609           | 76,792            | 160,817           |
| 95 to 99 years           | 69,827            | 17,143            | 52,684            |
| 100 years and over       | 9,968             | 1,774             | 8,194             |
| <b>18 years and over</b> | <b>29,882,742</b> | <b>14,738,897</b> | <b>15,143,845</b> |
| <b>Median Age</b>        | <b>40.8</b>       | <b>39.7</b>       | <b>41.8</b>       |

In the key provinces of British Columbia and Alberta, the ratios between age and sex remain largely consistent with the total Canadian population. Females comprise 50.9% of the population of Adults 18+ in British Columbia and 49.9% of Adults 18+ in Alberta. However, this number dips when scrutinizing the millennial population, as females tend to make up larger percentages of an aging population. Women only make up 48.6% of adults 18-34 years of age in British Columbia, and 48.7% in Alberta.

**Population by Province and Age/Sex 18+**

| Age            | British Columbia |         | Alberta |         |
|----------------|------------------|---------|---------|---------|
|                | Total            | Female  | Total   | Female  |
| 15 to 19 years | 278,449          | 135,095 | 251,337 | 122,387 |
| 20 to 24 years | 326,304          | 155,213 | 274,313 | 132,121 |
| 25 to 29 years | 348,003          | 169,757 | 326,082 | 158,359 |
| 30 to 34 years | 355,796          | 175,642 | 355,630 | 175,105 |
| 35 to 39 years | 337,164          | 169,537 | 342,125 | 170,219 |
| 40 to 44 years | 310,564          | 158,748 | 302,367 | 149,515 |
| 45 to 49 years | 336,228          | 173,138 | 281,502 | 137,680 |
| 50 to 54 years | 352,933          | 180,666 | 272,966 | 134,245 |
| 55 to 59 years | 374,912          | 191,674 | 284,634 | 141,754 |
| 60 to 64 years | 347,541          | 179,280 | 249,951 | 124,418 |
| 65 to 69 years | 297,853          | 153,558 | 187,836 | 95,170  |
| 70 to 74 years | 234,106          | 120,729 | 138,728 | 71,992  |
| 75 to 79 years | 157,411          | 82,056  | 92,822  | 49,589  |
| 80 to 84 years | 107,811          | 58,186  | 64,279  | 35,795  |



|                          |                  |                  |                  |                  |
|--------------------------|------------------|------------------|------------------|------------------|
| 85 to 89 years           | 70,556           | 40,455           | 42,373           | 25,158           |
| 90 to 94 years           | 33,097           | 21,578           | 19,263           | 12,773           |
| 95 to 99 years           | 10,354           | 7,565            | 5,528            | 4,147            |
| 100 years and over       | 1,537            | 1,213            | 855              | 699              |
| <b>18 years and over</b> | <b>4,113,550</b> | <b>2,093,033</b> | <b>3,341,787</b> | <b>1,667,694</b> |
| <b>18 to 34 years</b>    | <b>1,141,483</b> | <b>554,650</b>   | <b>1,056,560</b> | <b>514,540</b>   |

### **Proposed Notice Strategies**

The Notice Plan consists of a combination of notice placements in a leading consumer magazine, zoned editions of a leading commuter newspaper, and on a variety of websites, including the social media platforms Facebook, Instagram, and YouTube. Activity also includes the distribution of a national press release, notice placements in local newspapers and foreign language publications, and an organizational outreach to municipalities and unions.

The Notice Plan has been designed to reach a minimum of 85% of women 18 years of age or older throughout Canada *through the measurable media efforts alone*. It is anticipated that non-measurable media efforts will substantially increase reach.

Reach will be further enhanced and extended by the non-measurable media and outreach efforts.

### **Proposed Notice Tactics**

Following is a summary of the recommended notice tactics.

#### ➤ **Newspapers:**

- **Mainstream Newspapers:** An approximate quarter-page notice will appear once in mainstream newspapers covering Ottawa, Calgary, and Edmonton, and twice in a mainstream Vancouver newspaper.

#### **OTTAWA CITIZEN**

- *Ottawa Citizen*
  - Circulation: 75,898
  - Audience
    - Women 18+: 93,000
    - Women 18-34: 20,000
    - Women 35+: 73,000

#### **CALGARY HERALD**

- *Calgary Herald*
  - Circulation: 71,133
  - Audience
    - Women 18+: 105,000
    - Women 18-34: 27,000
    - Women 35+: 78,000



## EDMONTON JOURNAL

- *Edmonton Journal*
  - Circulation: 58,634
  - Audience: 222,000
    - Women 18+: 100,000
    - Women 18-34: 21,000
    - Women 35+: 79,000

## The Province

- *The Province*
  - Circulation: 123,935
  - Audience
    - Women 18+: 188,000
    - Women 18-34: 35,000
    - Women 35+: 153,000
- **Commuter Newspapers:** An approximate half-page notice will appear once in the major centers of the provinces where most Class Members reside (British Columbia and Alberta). These include the Vancouver, Calgary, and Edmonton editions of the free daily commuter newspaper, *StarMetro*, and as a double-size notice in *Coffee News*.

## STAR METRO VANCOUVER

- *Star Metro Vancouver*
  - Daily Print Readers: 287,000
  - Gender Split
    - 58% Male
    - 42% Female
  - Age Breakdown
    - 18-34: 100,000
    - 18-49: 175,000
    - 25-34: 61,000
    - 25-49: 137,000
    - 35-49: 76,000
    - 50-64: 60,000
    - 35+: 187,000
    - 65+: 51,000

## STAR METRO CALGARY

- *Star Metro Calgary*
  - Daily Print Readers: 121,000
  - Gender Split
    - 60% Male



- 40% Female
- Age Breakdown
  - 18-34: 36,000
  - 18-49: 58,000
  - 25-49: 47,000
  - 35-49: 22,000
  - 50-64: 37,000
  - 35+: 85,000
  - 65+: 26,000

### STAR METRO EDMONTON

- *Star Metro Edmonton*
  - Daily Print Readers: 119,000
  - Gender Split
    - 54% Male
    - 46% Female
  - Age Breakdown
    - 18-34: 33,000
    - 18-49: 57,000
    - 25-49: 42,000
    - 35-49: 24,000
    - 50-64: 35,000
    - 35+: 86,000
    - 65+: 27,000



- *Coffee News* is Canada's premier paper that patrons can pick up at their favourite restaurant, coffee shop, waiting room, reception area, doctor's office and anywhere else they wait for service. Each edition of *Coffee News* is customized for its community and contains 32 advertisements for small and medium-sized businesses in the local community it is distributed in. Local editions are published by an entrepreneur with a passion for community involvement.

The Short Form Notice will be published once in approximately 77 zoned editions covering areas with affected municipalities.

Editions include: St. Albert, Stony Plain, Spruce Grove, Leduc and Nisku, Vegreville and Mundare, Cold Lake, St. Paul, Drayton Valley, Whitecourt (including Fox Creek), Fort Saskatchewan (including Lamont and Bruderheim), Bonnyville Westlock, Edson, Hinton, Grande Prairie, Peace River, Slave Lake, Lloydminster, Beaumont, Devon, Wetaskiwin, Ponoka, Canmore, Cochrane, Chestermere and Strathmore, Airdrie, Okotoks, High River, Lacombe (includes Blackfalds), North Red Deer, Central Red Deer, South Red Deer, Sylvan Lake (includes Bentley), Innisfail and Olds (includes Bowden, Sundre and Spruceview), North and Coaldale, Trochu, Three Hills, Hanna and Drumheller, Rocky Mountain House (includes Eckville, Leslieville and Caroline), Swift Current, Steinbach and area, Stonewall and area,



Oromocto, Hampton/Quispamsis, Cornwall, South Windsor, East Windsor, Central Windsor, Port Alberni, Parksville/Qualicum, Cowichan Valley/Ladysmith, Chilliwack, South Okanagan, Summerland, Penticton, Cranbrook, Surrey (Cloverdale), Surrey (Guildford), Surrey (Fleetwood), Whalley/Surrey Centre, South Surrey (White Rock), Maple Ridge East, Maple Ridge West, North Langley, South Langley, Richmond, Downtown Kelowna, North Kelowna, West Kelowna and Peachland, Burnaby (North), Burnaby (Central), Burnaby (South), Comox Valley, Campbell River, North Vancouver (East), North Vancouver (West), Coquitlam, Port Coquitlam, and Squamish.

Coffee News consists of mostly female readers (66%) between 35-54 years old.

- **Local Newspapers:** A Short Form Notice will be placed once in approximately 100 local newspapers in each of the 154 municipalities containing one or more affected RCMP location. A single newspaper may provide coverage in one or municipality. Utilizing local newspapers will help provide coverage in medium and small rural areas. A list of local newspapers including the province and municipality they cover is attached as **Schedule A**.
- **Foreign/Cultural Publications:** A Short Form Notice will be placed in freely-distributed foreign and ethnic-focused community publications in the provinces/territories of affected RCMP locations, particularly in British Columbia, Alberta and Ottawa. The Short Form Notice will appear as approximate quarter-page broadsheet or half-page tabloid ad unit in French or English, as all Class Members speak at least one of those languages. The community papers are generally available free of charge and distributed in community centers, places of worship, transit centers, businesses, etc., in neighborhoods featuring high concentrations of each respective ethnic group (e.g., Chinese, Filipino, and/or South Asian publications), or targeting Chinese, Filipino, and/or South Asian communities in and around those municipalities.

Publications include *Desi Today*, *The Asian Star*, *Asian Pacific Post*, *South Asian Post*, *The Filipino Post*, *Sach Di Awaaz*, *Philippine Canadian Inquirer*, *The Link*, *Filipino Journal*, and *Philippine Showbiz News*. These publications were selected due to their high circulation, print language, female-oriented audiences, and other important factors. For example, *Desi Today* is Canada's first South-Asian news magazine delivered door-to-door, *Asian Pacific Post* is an energetic urban publication and the only English-language Chinese publication in British Columbia, *South Asian Post* is the largest circulation publication in the Indo-Canadian market, *The Filipino Post* is the largest circulation newspaper for the Filipino community, *Philippine Journal* is the oldest Filipino publication in British Columbia, *Philippine Canadian Inquirer* is the largest and only Filipino-Canadian newspaper distributed weekly all over Canada, and *The Link* is oldest newspaper for the Indo-Canadian community in Lower Mainland Vancouver.

#### ➤ **Digital Media**

- **Networks and Social Media:** To further extend reach, we recommend purchasing over 37 million English- and French-language internet impressions over a 60-day period. The digital media notices will be layered and targeted to a variety of women based on age, geographic location, interests, and online behaviors. All digital notices will include an embedded link to the case website.
  - **Women 35+ –** approximately 23.7M impressions will be distributed in English and French to women 35 years of age or older nationwide, with an emphasis in British Columbia and Alberta. The digital notices will be distributed via the Google Display Network and via the Facebook platform, and will include additional targeting to reach users whose online



behavior indicates an interest in the RCMP, law enforcement, government and public sector jobs, government agencies, nonprofit organizations, volunteering, or who work as government employees or in administration services.

## Google Display Network

- **GDN** is a vast ad network that reaches over 90% of internet users and harnesses the power of advertising opportunities to over two million websites and apps, including some of the most-visited websites and most recognizable properties on the entire internet.

## facebook.

- **Facebook** is the largest social media platform in terms of both audience size and engagement.
- **Female Millennials (Women 18-34)** – approximately 12.3M impressions will be distributed in English and French to women 18-34 years of age nationwide, with an emphasis in British Columbia and Alberta. The digital notices will also be distributed via Instagram and YouTube, as well as on a variety of websites that index highly among millennial females.



- **Instagram** is a free, online photo-sharing app and social networking platform owned by Facebook boasting a global community of over one billion users. It allows users to edit and upload photos and short videos.



- **YouTube** is the most popular video website on the internet. It is a video sharing website that allows users to watch videos, as well as upload their own videos and share them with friends, family and the world. YouTube visitors watch approximately 6 billion hours of videos each month. YouTube is owned by Google and is currently the second-largest search engine.



- **Custom website list** will be used to provide notice on websites that index highly among millennial females, such as celebrity gossip and entertainment, fitness, fashion and style sites.





- **Informational Press Release:** An informational press release will be distributed in both English and French across Canada Newswire (CNW), Canada's main and oldest newswire company. The press release will be disseminated to all major digital, print and broadcast news outlets across Canada plus all local newspapers in smaller urban and significant rural markets. The press release distribution will be supplemented with delivery to a national list of women's and men's lifestyle multi-media CNW subscribers in both English and French. Although we are not able to speculate on the number of press outlets that would report the story, the press release will provide a valuable role in distributing information in a cost-effective manner.
- **Municipality Outreach/Individual Notice:** All 154 municipalities with municipal police service agreements will be mailed a one-page Summary Notice, in both English and French. The mailing will also include a detailed cover letter that requests voluntary assistance in the distributing the Notices to potential Class Members by issuing the Notice by mail or email and posting it in a highly visible, high-trafficked area. Additionally, the cover letter will instruct the municipalities to go to the settlement website to obtain additional information, print additional Summary Notices and Posters, and obtain claims administration contact information to request specific forms of Notice or creative for use on websites, social media, etc. A list of the 154 municipalities is attached as **Schedule B**.
- **Union Outreach:** The Canadian Union of Public Employees (CUPE) is Canada's largest union, with over 680,000 members across the country. CUPE represents workers in health care, emergency services, education, early learning and child care, municipalities, social services, libraries, utilities, transportation, airlines and more.

All 67 CUPE office locations will be mailed a one-page Summary Notice, in both English and French. The mailing will also include a detailed cover letter that request their voluntary assistance in the distributing the Notices to potential Class Members by providing the Notice to its current and former members by mail or email and posting it in a highly visible, high-trafficked area. Additionally, the cover letter will instruct the CUPE offices to go to the settlement website to obtain additional information, print additional Summary Notices and Posters, and obtain claims administration contact information to request specific forms of Notice or creative for use on websites, social media, etc. A list of the 67 CUPE office locations is attached as **Schedule C**.

- **Individual Notice:** The Government of Canada has agreed to post the Summary Notice, in English or French as appropriate, in each affected RCMP detachment location. In addition, Canada will prepare and provide KCC/Ricepoint with a list of potential Primary Class Members who have ever had a Human Resources Management Information System ID with the RCMP, and for Primary Class members for whom current RCMP email address information is available, their email addresses. KCC/Ricepoint will provide Notice by email to the email addresses provided, including a link to the long form Notice and an embedded link to Class Counsel's websites for more information.

Providing individual Notice to Class Members through active RCMP email addresses will ensure individual notice is distributed where possible. Individual notice is the preferred method of notice because it provides information directly to Class Members.

Additionally, posting the Notice in municipalities and through the Canadian Union of Public Employees, as detailed above, will also be an effective form of Notice in this case. Posting the Notice in visible and highly-trafficked areas throughout offices where Class Members are employed allows for a greater opportunity for it to reach its intended audience and to be seen and read. It also allows for word-of-mouth promotion as Class Members involved in cases such as this tend to speak to each other about the Notice and share it with other Class Members who may or may not be the same office and may or may not be currently employed in an affected RCMP detachment.



***Media Costs for Notice Program (per Phase)***

| Media Type                    | Cost (CAD)*                         |
|-------------------------------|-------------------------------------|
| Commuter Newspapers           | \$17,930                            |
| Mainstream Newspapers         | \$21,011                            |
| Digital Media                 | \$89,500                            |
| Press Release                 | \$1,980                             |
| Foreign/Cultural Publications | \$9,456                             |
| Local Newspapers              | \$80,588                            |
| Municipality Outreach         | Included in Administration estimate |
| Individual Email Notice       | Included in Administration estimate |
| Union Outreach                | Included in Administration estimate |
| French Translation            | Included in Administration estimate |
| Professional Services         | \$6,000                             |

\*All prices are based on best estimates and valid for 30 days

\*\*Tax not included

\*\*\*All media placements subject to final review and approval by the vendor

## Schedule A

| Province | Municipality  | Newspaper                         | Circulation        |
|----------|---|-----------------------------------|--------------------|
| Alberta  | Airdrie<br>Chestermere<br>Cochrane<br>High River<br>Okotoks<br>Strathmore   | Calgary Herald                    |                    |
| Alberta  | Banff   |                                   |                    |
| Alberta  | Canmore   | Rocky Mountain Outlook            | 9,500              |
| Alberta  | Brooks  | Brooks Bulletin Weekend Regional  | 7,313              |
| Alberta  | Coakdale  | The Sunny South News              | 4,000              |
| Alberta  | Bonnyville  |                                   |                    |
| Alberta  | Cold Lake   | The Cold Lake Sun                 | 6,174              |
| Alberta  | Drayton Valley  | The Drayton Valley Western Review | 1,800              |
| Alberta  | Drumheller  | The Drumheller Mail               | TBD                |
| Alberta  | Edson   | The Edson Leader                  | 4,301              |
| Alberta  | Grande Prairie  | The Peace Country Sun             | 11,185             |
| Alberta  | Hinton  | The Hinton Parklander             | 3,976              |
| Alberta  | Lloydminster  | Merkian Source                    | 15,006             |
| Alberta  | Peace River   | Peace River Gazette               | 809                |
| Alberta  | Ponoka  | Ponoka News                       | 5,661              |
| Alberta  | Redcliff  | CHAT News Today                   | 10,000 daily users |
| Alberta  | Blackfalds<br>Innisfail<br>Oids   |                                   |                    |
| Alberta  | Red Deer  | Red Deer Advocate                 | 8,512              |
| Alberta  | Rocky Mountain House  | The Mountaineer                   | 3,600              |
| Alberta  | Slave Lake  | Lakeside Leader                   | 1,332              |
| Alberta  | Beaumont<br>Devon<br>Fort Saskatchewan<br>LeDuc<br>Morinville<br>Spruce Grove<br>St. Albert<br>Stony Plain<br>Strathcona County<br>Wetaskiwin | Edmonton Journal                  |                    |
| Alberta  | St. Paul  | St. Paul Journal                  | 3,600              |
| Alberta  | Stettler  | Stettler Weekender                | 5,442              |
| Alberta  | Sylvan Lake   | Sylvan Lake News                  | 5,586              |
| Alberta  | Vegreville  | Vegreville News Advertiser        | 11,257             |
| Alberta  | Wainwright  | Star Edge News                    | 4,690              |
| Alberta  | Town of Westlock  | Westlock News                     | 3,500              |
| Alberta  | Whitecourt  | The Whitecourt Star               | 2,687              |
| Alberta  | Wood Buffalo  | Fort McMurray Today               | 17,000             |

## Schedule A

| Province         | Municipality  | Newspaper                             | Circulation |
|------------------|---|---------------------------------------|-------------|
|                  | Burnaby<br>Chilliwack<br>Coquitlam<br>District of North Vancouver<br>Hope<br>Langley<br>Maple Ridge<br>Mission<br>North Vancouver City<br>Pitt Meadows<br>Port Coquitlam<br>Richmond<br>Squamish<br>Surrey<br>Township of Langley<br>Whistler<br>White Rock | <i>The Province</i>                   |             |
| British Columbia | Campbell River  | <i>Campbell River Mirror</i>          | 16,883      |
| British Columbia | Castlegar   | <i>Castlegar News</i>                 | 6,696       |
|                  | Colwood<br>Langford   | <i>Goldstream News Gazette</i>        | 17,656      |
| British Columbia | Comox<br>Courtenay  | <i>Comox Valley Record</i>            | 21,640      |
| British Columbia | Cranbrook   | <i>Cranbrook Townsman</i>             | 1,585       |
| British Columbia | Creston   | <i>Creston Valley Advance</i>         | 2,430       |
| British Columbia | Dawson Creek  | <i>Dawson Creek Mirror</i>            | 9,385       |
| British Columbia | Fernie  | <i>The Free Press</i>                 | 5,985       |
| British Columbia | Fort St. John   | <i>Pipeline News North</i>            | 11,600      |
| British Columbia | Kamloops  | <i>Kamloops This Week</i>             | 29,682      |
| British Columbia | Kelowna   | <i>Kelowna Capital News</i>           | 43,465      |
| British Columbia | Kent  | <i>Agassiz-Harrison Observer</i>      | 2,819       |
|                  | Kimberley   | <i>Kimberley Bulletin</i>             | 943         |
| British Columbia | Kitimat   | <i>Kitimat Northern Sentinel</i>      | 822         |
| British Columbia | Ladysmith   | <i>Ladysmith Chronicle</i>            | 4,116       |
| British Columbia | Lake Country  | <i>Winfield Lake Country Calendar</i> | 4,200       |
| British Columbia | Meritt  | <i>Meritt Herald</i>                  | 6,092       |
| British Columbia | Nanaimo   | <i>Nanaimo News Bulletin</i>          | 31,786      |
| British Columbia | North Cowichan  | <i>Duncan Cowichan Valley Citizen</i> | 21,276      |
| British Columbia | North Saanich   | <i>Peninsula News Review</i>          | 14,753      |
| British Columbia | Sidney  | <i>Osyoos Times</i>                   | 2,200       |
|                  | Osyoos  |                                       |             |
| British Columbia | Parksville  | <i>Parksville Qualicum News</i>       | 16,656      |
| British Columbia | Qualicum Beach  | <i>Peachland View</i>                 | 2,799       |
| British Columbia | Peachland   |                                       |             |
| British Columbia | Penticton   | <i>Penticton Western News</i>         | 21,848      |
| British Columbia | Port Alberni  | <i>Alberni Valley News</i>            | 9,349       |
| British Columbia | Powell River  | <i>Powell River Peak</i>              | 7,575       |
| British Columbia | Prince George   | <i>Prince George Citizen</i>          | 21,000      |
| British Columbia | Prince Rupert   | <i>Prince Rupert Northern View</i>    | 5,669       |

## Schedule A

| Province             | Municipality                                     | Newspaper                                      | Circulation |
|----------------------|--|--|-------------|
| British Columbia     | Quesnel  | <i>Quesnel Cariboo Observer</i>                | 5,672       |
| British Columbia     | Revelstoke                                       | <i>Revelstoke Times Review</i>                 | 1,800       |
| British Columbia     | Salmon Arm                                       | <i>Salmon Arm Observer</i>                     | 2,119       |
| British Columbia     | Sachelt  | <i>Coast Reporter</i>                          | 11,870      |
| British Columbia     | Smithers   | <i>Smithers Interior News</i>                  | 2,727       |
| British Columbia     | Sooke  | <i>Sooke News Mirror</i>                       | 5,773       |
| British Columbia     | Summerland                                       | <i>Summerland Review</i>                       | 1,300       |
| British Columbia     | Terrace  | <i>Terrace Standard</i>                        | 9,001       |
| British Columbia     | Trail  | <i>Trail Times</i>                             | 2,608       |
| British Columbia     | Armstrong<br>Coldstream<br>Spalumcheen<br>Vernon | <i>Vernon Morning Star</i>                     | 28,282      |
| British Columbia     | View Royal                                       | <i>Victoria News</i>                           | 24,510      |
| British Columbia     | Williams Lake                                    | <i>Williams Lake Weekend Advisor</i>           | 9,060       |
| Manitoba             | Beausejour                                       |  |             |
| Manitoba             | Pineau   | <i>The Clipper (Lac du Bonnet)</i>             | 13,300      |
| Manitoba             | Bolshevain                                       | <i>The Recorder</i>                            | 1,200       |
| Manitoba             | Carman   | <i>The Valley Leader</i>                       | 5,709       |
| Manitoba             | Dauphin  | <i>Dauphin Herald</i>                          |             |
| Manitoba             | The Pas  | <i>Opasquia Times</i>                          |             |
| Manitoba             | Roblin   | <i>Roblin Review</i>                           |             |
| Manitoba             | Russell  | <i>Russell Banner</i>                          |             |
| Manitoba             | Swan River                                       | <i>Swan Valley Star &amp; Times</i>            | 11,038      |
| Manitoba             | Flin Flon  | <i>Flin Flon Reminder</i>                      | 1,275       |
| Manitoba             | Gimli  | <i>Interlake Spectator</i>                     | 10,599      |
| Manitoba             | Killamey   | <i>The Guide</i>                               | TBD         |
| Manitoba             | Minnedosa  | <i>The Minnedosa Tribune</i>                   | 1,775       |
| Manitoba             | Neepawa  | <i>Neepawa Banner &amp; Press</i>              | 8,009       |
| Manitoba             | Portage La Prairie                               | <i>The Graphic Leader/Daily Graphic</i>        | 9,640       |
| Manitoba             | Selkirk  | <i>The Selkirk Journal</i>                     | 15,180      |
| Manitoba             | Souris   | <i>Souris Plaindealer</i>                      | 700         |
| Manitoba             | Steinbach  | <i>The Carlton</i>                             | 4,439       |
| Manitoba             | Stonewall  | <i>The Stonewall Argus &amp; Teulon Times</i>  | 5,860       |
| Manitoba             | Gillam   |  |             |
| Manitoba             | Thompson   | <i>Thompson Citizen</i>                        | 3,800       |
| Manitoba             | Virden   | <i>Virden Empire-Advance</i>                   | 1,600       |
| New Brunswick        | Bouctouche                                       |  |             |
| New Brunswick        | Codiac   | <i>Acadie Nouvelle</i>                         | 19,552      |
| New Brunswick        | Campbellton                                      | <i>Campbellton Tribune</i>                     | 1,904       |
| New Brunswick        | Hampton  | <i>Kings County Record</i>                     | 2,386       |
| New Brunswick        | Oromocto   | <i>The Telegraph Journal</i>                   | 21,901      |
| New Brunswick        | Sackville  | <i>Sackville Tribune-Post</i>                  | 1,618       |
| New Brunswick        | Saint Andrews                                    | <i>St. Croix Courier</i>                       | 2,900       |
| Nova Scotia          | Antigonish                                       | <i>The Casket</i>                              | 20,781      |
| Nova Scotia          | Pictou   | <i>The Advocate</i>                            | 3,500       |
| Nova Scotia          | Windsor  | <i>Hants Journal/Valley Journal Advertiser</i> | 2,930       |
| Nova Scotia          | Sheburne   |  |             |
| Nova Scotia          | Yarmouth   | <i>Tri-County Vanguard</i>                     | 3,632       |
| Prince Edward Island | Comwall  |  |             |
| Prince Edward Island | Stratford  | <i>The Guardian</i>                            | 11,669      |
| Saskatchewan         | Humboldt   | <i>The East Central Recorder</i>               | 13,000      |
| Saskatchewan         | Meadow Lake                                      | <i>Northern Pride</i>                          | 4,200       |
| Saskatchewan         | Melfort  | <i>Melfort Journal</i>                         | 21,766      |
| Saskatchewan         | North Battleford                                 | <i>The Battlefords Regional News-Optimist</i>  | 13,700      |
| Saskatchewan         | Swift Current                                    | <i>The Southwest Booster</i>                   | TBD         |
| Saskatchewan         | Martensville                                     |  |             |
| Saskatchewan         | Waman  | <i>Clark's Crossing Gazette</i>                | 16,188      |

### Schedule A

| Province     | Municipality | Newspaper             | Circulation    |
|--------------|--------------|-----------------------|----------------|
| Saskatchewan | Yorkton      | This Week Marketplace | 19,975         |
| <b>TOTAL</b> |              |                       | <b>858,049</b> |

## Schedule B

### List of Municipalities with Municipal Police Service Agreements

| British Columbia            |                      |                      |                     |
|-----------------------------|----------------------|----------------------|---------------------|
| Armstrong                   | Kamloops             | Parksville           | Sooke               |
| Burnaby                     | Kelowna              | Peachland            | Spalumcheen         |
| Campbell River              | Kent                 | Pentiction           | Squamish            |
| Castlegar                   | Kimberley            | Pitt Meadows         | Summerland          |
| Chilliwack                  | Kitimat              | Port Alberni         | Surrey              |
| Coldstream                  | Ladysmith            | Port Coquitlam       | Terrace             |
| Colwood                     | Lake Country         | Powell River         | Township of Langley |
| Comox                       | Langford             | Prince George        | Trail               |
| Coquitlam                   | Langley              | Prince Rupert        | Vernon              |
| Courtney                    | Maple Ridge          | Qualicum Beach       | View Royal          |
| Cranbrook                   | Merritt              | Quesnel              | West Kelowna        |
| Creston                     | Mission              | Revelstoke           | Whistler            |
| Dawson Creek                | Naniamo              | Richmond             | White Rock          |
| District of North Vancouver | North Cowichan       | Salmon Arm           | Williams Lake       |
| Fernie                      | North Sannich        | Sechelt              |                     |
| Fort St. John               | North Vancouver City | Sidney               |                     |
| Hope                        | Osoyoos              | Smithers             |                     |
| Alberta                     |                      |                      |                     |
| Airdrie                     | Drayton Valley       | Olds                 | Strathcona County   |
| Banff                       | Drumheller           | Peace River          | Strathmore          |
| Beaumont                    | Edson                | Ponoka               | Sylvan Lake         |
| Blackfalds                  | Fort Saskatchewan    | Redcliff             | Vegreville          |
| Bonnyville                  | Grande Prairie       | Red Deer             | Wainwright          |
| Brooks                      | High River           | Rocky Mountain House | Strathmore          |
| Canmore                     | Hinton               | Slave Lake           | Town of Westlock    |
| Chestermere                 | Innisfail            | Spruce Grove         | Wetaskiwin          |
| Coaldale                    | Leduc                | St. Albert           | Whitecourt          |
| Cochrane                    | Lloydminster         | St. Paul             | Wood Buffalo        |
| Cold Lake                   | Morinville           | Stettler             |                     |
| Devon                       | Okotoks              | Stony Plain          |                     |
| Saskatchewan                |                      |                      |                     |
| Humbolt                     | Meadow Lake          | North Battleford     | Warman              |
| Martensville                | Melfort              | Swift Current        | Yorkton             |
| Manitoba                    |                      |                      |                     |
| Beausejour                  | Gimli                | Roblin               | Swan River          |
| Boissevain                  | Killarney            | Russell              | The Pas             |
| Carman                      | Minnedosa            | Selkirk              | Thompson            |
| Dauphin                     | Neepawa              | Souris               | Virden              |
| Flin Flon                   | Pinawa               | Steinbach            |                     |

**Schedule B**

|                             |                    |           |               |
|-----------------------------|--------------------|-----------|---------------|
| Gillam                      | Portage La Prairie | Stonewall |               |
| <b>New Brunswick</b>        |                    |           |               |
| Bouctouche                  | Codiac             | Oromocto  | Saint Andrews |
| Campbellton                 | Hampton            | Sackville |               |
| <b>Nova Scotia</b>          |                    |           |               |
| Antigonish                  | Shelburne          | Windsor   | Yarmouth      |
| Pictou                      |                    |           |               |
| <b>Prince Edward Island</b> |                    |           |               |
| Cornwall                    | Stratford          |           |               |



## Schedule C

### List of Canadian Union of Public Employees Office Locations

| Office                           | Street Address                  | City          | Province | Zip     |
|----------------------------------|---------------------------------|---------------|----------|---------|
| CUPE National Office             | 1375 St. Laurent Blvd           | Ottawa        | ON       | K1G 0Z7 |
| Alberta Regional Office          | 300-10235 124 Street NW         | Edmonton      | AB       | T5N 1P9 |
| Calgary Area Office              | 240N-3015 Fifth Avenue          | Calgary       | AB       | T2A 6T8 |
| Fort McMurray Area Office        | 120-9521 Franklin Avenue        | For McMurray  | AB       | T9H 3Z7 |
| Grande Prairie Area Office       | 101-10126 117 Avenue            | Grand Prairie | AB       | T8V 7S4 |
| Lethbridge Area Office           | 102-3305 18 Avenue N            | Lethbridge    | AB       | T1H 5S1 |
| Medicine Hat Area Office         | 103-640 Kingsway Avenue SE      | Medicine Hat  | AB       | T1A 2W9 |
| Red Deer Area Office             | 250-5002 55th Street            | Red Deer      | AB       | T4N 7A4 |
| British Columbia Regional Office | 6222 Willingdon Avenue          | Burnaby       | BC       | V5H 0G3 |
| Victoria Area Office             | 110-3550 Saanich Road           | Victoria      | BC       | V8X 1X2 |
| Comox Valley Area Office         | 6-204 North Island Highway      | Courtenay     | BC       | V9N 3P1 |
| Cranbrook Area Office            | 116-7th Avenue S                | Cranbrook     | BC       | V1C 2J4 |
| Fraser Valley Area Office        | 201-32615 South Fraser Way      | Abbotsford    | BC       | V2T 1X8 |
| Kelowna Area Office              | 303-1912 Enterprise Way         | Kelowna       | BC       | V1Y 9S9 |
| Nanaimo Area Office              | 603-495 Dunsmuir Street         | Nanaimo       | BC       | V9R 6B9 |
| Prince George Area Office        | 1505 Victoria Street            | Prince George | BC       | V2L 2L4 |
| Terrace Area Office              | 3210 Emerson Street             | Terrace       | BC       | V8G 2R8 |
| Trail Area Office                | 206-1199 Bay Avenue             | Trail         | BC       | V1R 4A4 |
| Manitoba Regional Office         | 703-275 Broadway                | Winnipeg      | MB       | R3C 4M6 |
| Brandon Area Office              | 1911 Park Avenue                | Brandon       | MB       | R7B 4A7 |
| Dauphin Area Office              | 121 First Street SW             | Dauphin       | MB       | R7N 1M9 |
| Maritimes Regional Office        | 91 Woodside Lane                | Fredericton   | NB       | E3C 0C5 |
| Bathurst Area Office             | 970 Principale Street, Suite 1  | Beresford     | NB       | E8K 2H6 |
| Charlottetown Area Office        | 26 Paramount Drive              | Charlottetown | PEI      | C1E 0C7 |
| Dalhousie Area Office            | 396 Renfrew Street              | Dalhousie     | NB       | E8C 2K4 |
| Edmundston Area Office           | 295 Power Road                  | Edmundston    | NB       | E3V 3L6 |
| Moncton Area Office              | 113 Englehart Street            | Dieppe        | NB       | E1A 8K2 |
| Saint John Area Office           | 208 Lancaster Avenue            | Saint John    | NB       | E2M 2K9 |
| Atlantic Regional Office         | 271 Brownlow Avenue             | Dartmouth     | NS       | B3B 1W6 |
| Corner Brook Area Office         | 17-50 Main Street               | Corner Brook  | NL       | A2H 1C4 |
| New Glasgow Area Office          | 115 Maclean Street              | New Glasgow   | NS       | B2H 4M5 |
| St. John's Area Office           | 102-15 International Place      | St. John's    | NL       | A1A 0L4 |
| Sydney Area Office               | 500 George Street               | Sydney        | NS       | B1P 1K6 |
| Yarthumbouth Area Office         | 1C Second Street                | Yarthumbouth  | NS       | B5A 1T4 |
| Ontario Regional Office          | 80 Commerce Valley Drive E      | Markham       | ON       | L3T 0B2 |
| Barrie Area Office               | Unit 619, 55 Cedar Pointe Drive | Barrie        | ON       | L4N 0B2 |
| Cornwall Area Office             | 231 McConnell Avenue            | Cornwall      | ON       | K6H 5R7 |
| Hamilton Area Office             | 1700-21 King Street W           | Hamilton      | ON       | L8P 4W7 |
| Kenora Area Office               | 205-308 Second Street S         | Kenora        | ON       | P9N 1G4 |
| Kingston Area Office             | 615 Norris Court                | Kingston      | ON       | K7P 2R9 |
| Kitchener Area Office            | 204-1120 Victoria Street N      | Kitchener     | ON       | N2B 3T2 |
| Lakehead Area Office             | 1159 Alloy Drive                | Thunder Bay   | ON       | P7B 6M8 |

### Schedule C

|                                  |                                |                   |    |         |
|----------------------------------|--------------------------------|-------------------|----|---------|
| London Area Office               | 101-350 Oxford Street W        | London            | ON | N6H 1T3 |
| Niagara Area Office              | 101-110A Hannover Drive        | St. Catherines    | ON | L2W 1A4 |
| North Bay Area Office            | 120 Lakeshore Drive            | North Bay         | ON | P1A 2A8 |
| Oshawa Area Office               | 104-419 King Street W          | Oshawa            | ON | L1J 2K5 |
| Ottawa Area Office               | 1378 Triole Street             | Ottawa            | ON | K1B 3M4 |
| Ottawa Valley Area Office        | 380 Isabella Street            | Pembroke          | ON | K8A 5T2 |
| Peel Area Office                 | 25 Watline Avenue, Suite 202   | Mississauga       |    | L4Z 2Z1 |
| Peterborough Area Office         | 6-165 Sherbrooke Street        | Peterborough      | ON | K9J 2N2 |
| Sault Ste. Marie Area Office     | 606-421 Bay Street             | Saulte Ste. Marie | ON | P6A 1X3 |
| Sudbury Area Office              | 205-888 Regent Street          | Sudbury           | ON | P3E 6C7 |
| Timmins Area Office              | 124 Third Avenue               | Timmins           | ON | P4N 1C5 |
| Windsor Area Office              | 414-3200 Deziel Drive          | Windsor           | ON | N8W 5A5 |
| Quebec Regional Office           | 7100-565 Cremazie Boulevard E  | Montreal          | QC | H2M 2V9 |
| Baie-Comeau Area Office          | 201-1041 De Mingan Street      | Baie Comeau       | QC | G5C 3W1 |
| Hull Area Office                 | 300-259 St. Joseph Boulevard   | Hull              | QC | J8Y 6T1 |
| Quebec Area Office               | 200-5050 Des Gradins Boulevard | Quebec            | QC | G2J 1P8 |
| Rimouski Area Office             | 607-2 St. Germain Street E     | Rimouski          | QC | G5L 8T7 |
| Rouyn-Noranda Area Office        | 2500-201 Du Terminus Street W  | Rouyn-Noranda     | QC | J9X 2P7 |
| Sept-Iles Area Office            | 707 Laure Boulevard            | Sept-Iles         | QC | G4R 1Y2 |
| Sherbrooke Area Office           | 2300-790 De la Rand Street     | Sherbrooke        | QC | J1H 1W7 |
| Trois-Rivieres Area Office       | 207-7080 Marion Street         | Trois-Rivieres    | QC | G9A 6G4 |
| Saguenay-Lac-St-Jean Area Office | 210-2679 Du Royaume Boulevard  | Jonquiere         | QC | G7S 5T1 |
| Saskatchewan Regional Office     | 3731 E. Eastgate Drive         | Regina            | SK | S4Z 1A5 |
| Prince Albert Area Office        | 1250 A. First Avenue E.        | Prince Albert     | SK | S6V 2A8 |
| Saskatoon Area Office            | 250 Cardinal Crescent          | Saskatoon         | SK | S7L 6H8 |

**SCHEDULE D**  
**OPT OUT FORM**

*Tiller, Copland, and Roach v. Her Majesty the Queen*, Court File No.: T-1673-17

RCMP Gender and Sexual Orientation Based Harassment and Discrimination Class Action

*This is not a Claim Form. Submitting this form excludes you from the class action and the proposed settlement of the class action. Do not use this form if you wish to receive compensation under the proposed settlement.*

**You only need to file an Opt-Out Form if you wish to retain the right to pursue an individual action. If you do not wish to pursue an individual action and do not wish to file a claim for compensation under the settlement, you do not need to complete this form.**

Name:

Current Address:

Date of Birth:

Dates and locations worked or volunteered with the RCMP:

Reason for Opting Out:

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

To Opt Out of the Class Action, you must sign and deliver this form to Class Counsel at the address below received or postmarked no later than \*\*\*\*\*, 2019:

**KLEIN LAWYERS LLP**  
Attn: Whitney Santos  
Suite 400-1385 West 8<sup>th</sup> Avenue  
Vancouver, BC V6H 3V9

Phone: (604) 874-7171  
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