

**CANADIAN HUMAN RIGHTS TRIBUNAL**

BETWEEN:

**FIRST NATIONS CHILD AND FAMILY CARING SOCIETY OF CANADA and  
ASSEMBLY OF FIRST NATIONS**

Complainants

- and -

**CANADIAN HUMAN RIGHTS COMMISSION**

Commission

- and -

**ATTORNEY GENERAL OF CANADA**  
(Representing the Minister of Indigenous and Northern Affairs Canada)

Respondent

- and -

**CHIEFS OF ONTARIO,  
AMNESTY INTERNATIONAL CANADA and  
NISHNAWBE ASKI NATION**

Interested Parties

**NOTICE OF MOTION OF THE COMPLAINANT  
FIRST NATIONS CHILD AND FAMILY CARING SOCIETY OF CANADA**

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**AFFIDAVIT #2 OF CINDY BLACKSTOCK**

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I, Cindy Blackstock, of the City of Ottawa in the Province of Ontario, make oath and say as follows:

1. I am the Executive Director of the First Nations Child and Family Caring Society (“Caring Society”), one of the complainants in the human rights complaint related to

Canada's racial discrimination against nearly 165,000 First Nations children for its inequitable funding for child welfare services and its failure to fully implement Jordan's Principle. As such, I have knowledge of the matters herein deposed, except where stated that the matter is based on information and belief, and where so stated I believe the same to be true.

2. In addition to my position as the Executive Director of the Caring Society, I am also a Professor at McGill University School of Social Work.
3. I affirm this affidavit in support of the Caring Society's motion for non-compliance, seeking declaratory and immediate relief for First Nations children living on reserve and in the Yukon.
4. On December 19, 2016, I attended a meeting with INAC representatives and BC FNCFS agency Directors held in Vancouver. During the meeting, I obtained a spreadsheet entitled "Allocation of HRT Immediate Relief Methodology for 2016-2017" dated May 12, 2016. To my knowledge, this document has not been disclosed by INAC to the Tribunal or the parties in this matter. The numbers in the spreadsheet do not correspond with those presented in INAC's September 30, 2016 compliance report to the Tribunal which provides the costing analysis for BC. Attached as **Exhibit A** to this affidavit is a copy of this spreadsheet.
5. I make this affidavit in good faith and for no other or improper purpose.

AFFIRMED BEFORE ME )  
at Prince George, British Columbia on )  
December 20, 2016 )  
)  
)  
)  
)  
A Commissioner for taking affidavits, etc. )

\_\_\_\_\_  
CINDY BLACKSTOCK

**EXHIBIT "A" TO AFFIDAVIT #2 OF  
CINDY BLACKSTOCK, AFFIRMED  
BEFORE ME IN THE CITY OF  
PRINCE GEORGE  
ON DECEMBER 20, 2016**



# Allocation of HRT Immediate Relief Methodology for 2016-2017

Recommendation: May 12, 2016

CFS Agency	A.) 2015-2016 Total Ops Funding (Basic+Other+Transition)	B.) 2016-2017 Total Ops Funding (Basic + Other)	C.) 2016-2017 HRT Immediate Remedies Allocation (Includes Transition)	D.) 2016-2017 Total New Ops Allocation (B + C)
C3 Namgis	\$284,846	\$280,001	\$70,000	\$350,001
C3 Denisiqi	\$658,237	\$660,650	\$165,163	\$825,813
C3 Haida	\$356,766	\$362,553	\$90,638	\$453,191
C3 Heiltsuk	\$313,788	\$323,832	\$80,958	\$404,790
C4 Ayas Men Men	\$986,289	\$580,830	\$669,909	\$1,250,739
C4 Nezel Be Hunuyeh	\$364,352	\$374,005	\$425,374	\$799,379
C4 Carrier Sekani	\$1,393,822	\$972,567	\$695,761	\$1,668,328
C4 Nil/Tu,o	\$966,226	\$950,618	\$346,909	\$1,297,527
C4 Northwest Inter-Nation	\$1,021,046	\$812,232	\$281,138	\$1,093,370
C4 Gitxsan	\$737,384	\$824,131	\$340,803	\$1,164,934
C6 Cowichan/Lalum'utul	\$1,317,685	\$1,025,551	\$742,534	\$1,768,085
C6 Usma Nuw Chah Nulth	\$1,569,950	\$1,074,065	\$738,085	\$1,812,150
C6 Secwepemc	\$918,949	\$738,874	\$772,166	\$1,511,040
C6 Ktunaxa Kinbasket	\$247,191	\$253,981	\$261,922	\$515,903
C6 Fraser Valley Aboriginal Society	\$1,467,014	\$935,379	\$680,427	\$1,615,806
C6 Kwumut' Lelum	\$1,059,987	\$1,137,993	\$688,499	\$1,826,492
C6 Nlha'7Kapmx	\$622,337	\$381,378	\$385,804	\$767,182
C6 Knucwentwecw	\$499,894	\$370,595	\$408,890	\$779,485
C6 Scw'exmx	\$525,889	\$404,075	\$520,723	\$924,798
Bylaw Splatsin Stsmamlt	\$330,271	\$88,807	\$383,697	\$472,504
Totals	\$15,641,923	\$12,552,117	\$8,749,400	\$21,301,517

## FNCFS Post-Budget 2016 Regional Funding profile

Year 1 (2016-2017) @ 40%	Year 2 (2017-2018) @ 60%	Year 3 (2018-2019) @ 80%	Year 4 (2019-2020) @ 100%	Year 5 (2020-2021) @ 100%
\$5,390,010	\$8,085,015	\$10,780,020	\$13,475,025	\$13,475,025

Note: The existing \$3.36M currently identified as Transition Funding will be provided each year in addition to the new FNCFS funding allocation