

**Cross-Examination Questions for Cindy Blackstock
regarding her affidavit affirmed on August 30th, 2022**

Interpretation:

“**AFN**” means the Assembly of First Nations.

“**Caring Society**” means the First Nations Child and Family Caring Society of Canada.

“**FSA**” means the Final Settlement Agreement, dated June 30, 2022 found at Exhibit “F” to the Affidavit of Janice Ciavaglia, dated July 22, 2022

“**Moushoom Counsel**” means Class Counsel for Xavier Moushoom, Jeremy Meawasige (by his litigation guardian, Jonavon Joseph Meawasige), Jonavon Joseph Meawasige and bearing Federal CourtFile T-402-19.

“**Tribunal**” means the Canadian Human Rights Tribunal.

“**Your Affidavit**” means the Affidavit of Cindy Blackstock, affirmed on August 30th, 2022.

Question:	Dr. Cindy Blackstock’s Answers:
1. You state you have been the Executive Director of the Caring Society for 35 years. When was the Caring Society Incorporated?	
2. Can you confirm that the Caring Society’s Board of Directors are: Judy Levi, Elsie Flette, Landon Pearson, Arlene Johnson, Koren Lightning-Eagle, Mary Teegee, Theresa Stevens, Kenn Richard, Raymond Shingoose?	
3. Who are the members of the Caring Society?	
4. At paragraph 6, of Your Affidavit, you state that the Caring Society had minimal involvement in the negotiations of the compensation settlement agreement. Were you and your legal counsel present at the negotiating table during the intensive compensation negotiations presided over by the Honourable Murray Sinclair in November 2021?	
5. Was it not the Caring Society who recommended and insisted that Mr. Sinclair be the facilitator of the intensive negotiations?	

<p>6. Did you and your counsel meet on numerous dates with the Moushoom Counsel before, during and after the intensive negotiations between October, 2021 and December, 2021 for briefings on the status of negotiations for compensation?</p>	
<p>7. In relation to question 7 above, did you and/or your legal advisors not provide Moushoom Counsel with your views on numerous aspects of the proposed settlement on compensation prior to the conclusion of the Agreement-in-Principle for Compensation?</p>	
<p>8. Was the Caring Society a party to the mediation on compensation before the Honourable Leonard Mandamin which occurred between December 2020 and September 2021?</p>	
<p>9. At Paragraph 7 of Your Affidavit, you state that no formal response was provided by the AFN, Canada, the Representative Plaintiffs, or class counsel to your letter of January 21st, 2022. Did Moushoom Counsel share drafts of the FSA with the you shortly after your letter?</p>	
<p>10. In relation to question 9, did Moushoom Counsel also speak and virtually meet with you and/or your legal counsel on April 21, 2022 to discuss the FSA and the negotiations?</p>	
<p>11. Did you and your legal counsel meet with the AFN on April 25, 2022 to discuss the FSA and to provide your views on the agreement?</p>	
<p>12. Did Moushoom Counsel write to the Caring Society on April 27, 2022 requesting that the Caring Society provide its questions and concerns with he draft FSA?</p>	
<p>13. In relation to paragraph 7 of Your Affidavit, did Mr. David Taylor, legal counsel to the Caring Society, provide a list of questions to Moushoom Counsel by email on April 28, 2022?</p>	

<p>14. In relation to question 13, did the list of questions Mr. Taylor pose reflect themes expressed in your January 21st, 2022 letter?</p>	
<p>15. Did Moushoom Counsel provide you or your legal counsel with a detailed 12-page response to Mr. Taylor’s questions on May 13, 2022, along with three supplementary documents?</p>	
<p>16. In relation to question 15, will you agree to allow the AFN to file with the Tribunal the May 13, 2022 response of Moushoom Counsel?</p>	
<p>17. At paragraph 15 of Your Affidavit, you assert that the original CHRT complaint was drafted by yourself. Is it not true that the AFN had a notable role in drafting the complaint?</p>	
<p>18. At paragraph 19 of Your Affidavit, you assert that some First Nations leaders are not in support the FSA. Have you been lobbying First Nations chiefs to express your views on the FSA and seek support to defeat the compensation agreement? Approximately how many First Nations leaders have you spoken to?</p>	
<p>19. Have you met with, called and/or spoken with Regional Chiefs who sit the on AFN’s Executive Committee to discuss your views of the FSA? Which Regional Chiefs have you spoken to?</p>	
<p>20. At paragraphs 20 and 21 of Your Affidavit you refer to resolutions by political organizations. Did you, a board member of the Caring Society, an employee of the Caring Society, or your legal counsel participate in the drafting of, or otherwise inform draft those resolutions?</p>	
<p>21. In relation to question 20 above, did you, a board member of the Caring Society, an employee of the Caring Society, and/or your legal counsel lobby chiefs to pass the First Nations Summit and/or Federation of Sovereign Indigenous Nations resolutions?</p>	

<p>22. Did you, your board members, Caring Society employee(s), and/or legal counsel lobby other First Nations provincial and/or regional First Nations organizations to seek support to reject the compensation FSA? Which provincial or regional First Nations organizations have you been lobbying or speaking to or their officials?</p>	
<p>23. Did you and Mary Teegee, a Board of Director of the Caring Society, attend the AFN Annual General Assembly in July 2022 and seek support of and/or lobby chiefs to table a draft resolution to oppose the FSA?</p>	
<p>24. Did you, a board member of the Caring Society, an employee of the Caring Society, or your legal counsel draft, participate in the drafting of, or otherwise inform the proposed AFN resolution referred to in Question 23?</p>	