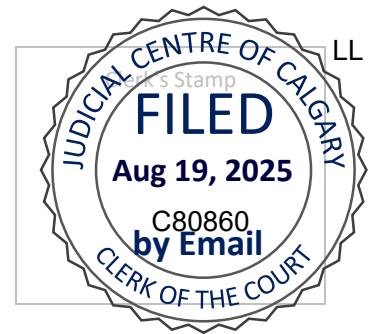


COURT FILE NUMBER	1701-04755
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	CALGARY
PLAINTIFF	N.B.
DEFENDANTS	PHILIP HEEREMA, CALGARY EXHIBITION AND STAMPEDE LIMITED, and CALGARY STAMPEDE FOUNDATION
DOCUMENT	<b>FINAL REPORT TO THE COURT AND TO THE CLASS</b>
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	<b>JENSEN SHAWA SOLOMON DUGUID HAWKES LLP</b> 800, 304 - 8 Avenue SW Calgary, Alberta T2P 1C2  Carsten Jensen KC, FCI Arb   Gavin Price Kajal Ervin   Cassandra Sutter Phone: 403-571-1526   403-571-0747 403-571-0745   403-571-1054 Email: <a href="mailto:jensenc@jssbarristers.ca">jensenc@jssbarristers.ca</a>   <a href="mailto:priceg@jssbarristers.ca">priceg@jssbarristers.ca</a>   <a href="mailto:ervink@jssbarristers.ca">ervink@jssbarristers.ca</a>   <a href="mailto:sutterc@jssbarristers.ca">sutterc@jssbarristers.ca</a> Fax: 403-571-1528 File: 13652-002



Further to the Settlement Approval hearing before the Honourable Justice P.R. Jeffrey on June 28, 2024, and further to the Settlement Approval Order filed on July 4, 2024, Class Counsel reports as follows:

1. Class Counsel and the Claims Administrator provided notice of the Settlement Approval Order by way of the Short and Long Notices, pursuant to the Plan of Notice set out at Schedule C to the Settlement Agreement.
2. The claims process is now concluded, and each eligible Class Member has received their distributions in accordance with their claim category and (as applicable) the points assigned to their claims.

3. The final summary of the Class Members' claims, respective categories and point allocations pursuant to the Distribution Protocol are as follows:

<b>Claim Category</b>	<b>Known Number at Settlement Approval</b>	<b>Final Number of Class Members</b>	<b>Breakdown of Points</b>	<b>Total Points Allocated</b>
Student Compromised Experience Claim ("SCEC")	Up to 156 <sup>1</sup>	7	N/A	N/A
Student Compromised Experience Enhanced Claim ("SCEEC")	Up to 156	20	N/A	N/A
Directly Impacted - Group 1 (10 base points)	8	12	6 Class Members received an additional 3 points for impacts. 1 Class Member received an additional 1 point for impacts.	139
Directly Impacted - Group 2 (8 base points)	5	9	1 Class Member received an additional 3 points for impacts. 1 Class Member received an additional 2 points for impacts. 5 Class Members received an additional 1 point for impacts.	82
Directly Impacted - Group 3 (6 base points)	10	19	1 Class Member received an additional 2 points for impacts. 6 Class Members received an additional 1 point for impacts.	122
Directly Impacted - Group 4 (3 base points)	2	2	No additional points for impacts.	6
Directly Impacted - Group 5 (1 base point)	14	18	3 Class Members received an additional 1 point for impacts.	21
<b>TOTAL</b>		<b>87</b>		<b>370</b>

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<sup>1</sup> This number was based on the 195 senior male students identified by the Stampede Defendants during the class period, less the 39 known Class Members at the time of the Settlement Approval hearing

4. At the Settlement Approval hearing, based on the known claimants, Class Counsel estimated a total of 317 points to be distributed, but then added a 20% contingency for additional Class Members who had not yet contacted Class Counsel, but may come forward during the claims period to submit a claim, for an estimated total of 381 points. As can be seen in the table above, this estimate was very close to the final outcome.

5. Upon all claims received and being assessed by the Claims Administrator, each point had a value of \$16,917.89, and this formed the basis for the first distribution of funds to Class Members, which was issued by the Claims Administrator by March 31, 2025.

6. The breakdown of funds for the first distribution to Class Members was as follows:

Claim Category		Number of Class Members	Amount Awarded per Claim	Total Payment
SCEC		7	\$500.00	\$3,500.00
SCEEC		20	\$1,500.00	\$30,000.00
1 harm point	0 effect points	15	\$16,917.89	\$253,768.35
1 harm point	1 effect point	3	\$33,835.78	\$101,507.34
3 harm points	0 effect points	2	\$50,753.67	\$101,507.34
6 harm points	0 effect points	12	\$101,507.34	\$1,218,088.08
6 harm points	1 effect point	6	\$118,425.23	\$710,551.38
6 harm points	2 effect points	1	\$135,343.12	\$135,343.12
8 harm points	0 effect points	2	\$135,343.12	\$270,686.24
8 harm points	1 effect point	5	\$152,261.01	\$761,305.05
8 harm points	2 effect points	1	\$169,178.90	\$169,178.90
8 harm points	3 effect points	1	\$186,096.79	\$186,096.79
10 harm points	0 effect points	5	\$169,178.90	\$845,894.50
10 harm points	1 effect point	1	\$186,096.79	\$186,096.79
10 harm points	3 effect points	6	\$219,932.57	\$1,319,595.42
<b>TOTAL</b>		<b>87</b>		<b>\$6,293,119.30</b>

7. Following the Order granted on April 14, 2025, and following the receipt of additional funds for distribution, the Claims Administrator proceeded with a second distribution resulting in payment of an additional \$142.81 per point, which was issued by the Claims Administrator by July 31, 2025.

8. The breakdown of funds for the second distribution to Class Members was as follows:

Claim Category		Number of Class Members	Amount Awarded per Claim	Total Payment
1 harm point	0 effect points	15	\$142.81	\$2,142.15
1 harm point	1 effect point	3	\$285.62	\$856.86
3 harm points	0 effect points	2	\$428.43	\$856.86
6 harm points	0 effect points	12	\$856.86	\$10,282.32
6 harm points	1 effect point	6	\$999.67	\$5,998.02
6 harm points	2 effect points	1	\$1,142.48	\$1,142.48
8 harm points	0 effect points	2	\$1,142.48	\$2,284.96
8 harm points	1 effect point	5	\$1,285.29	\$6,426.45
8 harm points	2 effect points	1	\$1,428.10	\$1,428.10
8 harm points	3 effect points	1	\$1,570.91	\$1,570.91
10 harm points	0 effect points	5	\$1,428.10	\$7,140.50
10 harm points	1 effect point	1	\$1,570.91	\$1,570.91
10 harm points	3 effect points	6	\$1,856.53	\$11,139.18
<b>TOTAL</b>		60		\$52,839.70

9. As a result of the first and second distributions, each point had a final value of **\$17,060.70**. At the Settlement Approval hearing, Class Counsel had estimated each point to have a value of approximately \$15,000. Ultimately the point value was greater than estimated because Class Counsel had included a margin for additional claimants and impact points, and there were fewer claimants in the SCEC and SCEEC categories.

10. Payments to the Class Members were issued by wire transfer, direct deposit or cheque. Upon all final cheques clearing, the Claims Administrator will schedule the destruction of all data related to the administration of this matter. All electronic data will be securely destroyed in-house, and all paper records will be destroyed via shredding by the Claims Administrator's designated vendor on the same date.

11. Once all cheques have successfully cleared,<sup>2</sup> Class Counsel will follow up with a letter to the Court to confirm receipt of all payments by the Class Members and the destruction of all data by the Claims Administrator in the manner noted above.

12. Pursuant to section 5.2 of the Settlement Agreement:

- (a) The Stampede Defendants issued a public apology in the form attached as Schedule "G" to the Settlement Agreement;

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<sup>2</sup> All amounts from the first distribution have been paid to and received by the Class Members. As of the date of this report, all amounts from the second distribution have been paid to the Class Members, and most funds have been received. The Claims Administrator is awaiting confirmation of successful deposit for 5 cheques that were issued for the second distribution and mailed out to those respective Class Members.

- (b) The Stampede Defendants carried out Additional Programs, as set out in the Status Report on April 2, 2025, attached as **Exhibit "A"** hereto; and
- (c) An online survey was distributed to Class Members by the Claims Administrator on behalf of the Stampede Defendants to seek input on new initiatives. The survey remained open until July 3, 2025. The Stampede Defendants partnered with Calgary Communities Against Sexual Abuse (**CCASA**) on training, policy review, and on the development of the survey questions. The CCASA will be involved in helping to review the results. Stone-Olafson, a third-party research firm, collected the survey information, ensuring its confidentiality. Participation in this survey was entirely voluntary.

13. During the claims process and the implementation of the settlement, Class Counsel have received communications from numerous Class Members who have expressed their satisfaction with the process and the result. However, Class Counsel have received communications from one Class Member expressing their dissatisfaction with the claims process and the outcome. This Class Member had contemplated making an objection to the settlement prior to the Settlement Approval hearing, but ultimately chose to not proceed with an objection at that time. This Class Member contacted the Court on January 8, 2025, expressing their concerns. The Court responded to this Class Member on January 10, 2025. At all times, Class Counsel and the Claims Administrator have responded to this Class Member on a timely basis and have provided information requested to the best of their ability. Class Counsel understands that this Class Member continues to have concerns and has requested an appearance before the Court. While Class Counsel does not believe that a Case Management Conference is necessary, should the Court believe one is needed to address this matter, Class Counsel would be pleased to arrange the same.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED** this 14<sup>th</sup> day of August, 2025.

**JENSEN SHAWA SOLOMON DUGUID HAWKES  
LLP**

Per:



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Cassandra Sutter  
Counsel for the Class

## EXHIBIT “A”

Calgary Stampede Foundation – Additional Programs - Status Report April 2, 2025

### Agreement:

*In addition to the enhanced safety measures which have already been put in place, the Calgary Stampede Foundation will undertake to carry out Additional Programs including but not limited to:*

- (1) providing trauma-informed training for youth program leadership and staff; and*
- (2) hosting a safety and wellness learning forum with youth-serving organizations in Calgary and surrounding areas*

### Trauma-informed training:

Trauma-informed sexual violence training was provided to 69 youth program leadership, staff and faculty in Fall 2024 through Calgary Communities Against Sexual Abuse (CCASA). CCASA is the primary sexual harassment, sexual abuse and sexual assault crisis, counselling and education service-provider for Calgary and the surrounding areas, and are leaders in the field. In addition, in Winter 2025, the Foundation extended this training to 275 youth program participants from the Young Canadians, Stampede Showband, and Showriders programs. The training program was adapted from the established training program CCASA provides in Calgary schools, and includes resources shared afterwards. The training covers an overview of sexual violence, supportive ways to respond to disclosures, and prevention of future occurrences by challenging harmful behaviors and promoting awareness of healthy relationships. We will offer the training again in the 2025-26 programming year with further program expansion to include board-level leadership.

### Safety and wellness learning forum:

The safety and wellness learning forum planning is underway. The date has been set (Nov. 27, 2025) and the venues are booked. The Foundation has engaged a team to work together to deliver the Forum, including community partner organizations and forum leadership. In March and April, the Foundation and our partners are undertaking focus groups with community youth-serving organizations to inform forum design and content. Specific curriculum and speakers will be confirmed in the spring and summer. The vision of the forum is that, through the convening of youth-serving organizations at an initial one-day event, a sense of community is fostered that catalyzes ongoing connection and collaboration towards building safer places and programs for youth. The forum's working objectives are that a) knowledge and experience with safety practices is shared, b) attendees are equipped with new learning to enhance safety practices in their own programs or spaces, and c) groundwork is laid for ongoing engagement, commitment, and community of practice for youth safety. These objectives will be revisited with feedback from class members (see below).

### Apology letter & class engagement

The letter of apology sets out that the Calgary Stampede Foundation will engage class members to seek input on these additional initiatives, at their option, in a trauma-informed environment. In consultation with CCASA, Onward Psychology, and Stone-Olafson, the Foundation has developed a survey that will be distributed to class members in April 2025.