

COURT FILE NUMBER KBG 1263-2022

COURT OF KING'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE Saskatoon

PLAINTIFF(S) Louis Gardiner, Margaret Aubichon, Melvina  
Aubichon, Emile Janvier, Duane Favel, and Donna Janvier

DEFENDANT(S) The Attorney General of Canada and His Majesty the  
King in Right of the Province of Saskatchewan

Brought under *The Class Actions Act*, S.S. 2001, c. C-12.01

**JOINT AFFIDAVIT OF DR. AMANDA FEHR AND DR. KATYA MACDONALD**

I, DR. AMANDA FEHR of the CITY of Saskatoon, Saskatchewan, and I, DR. KATYA  
MACDONALD, of the CITY of Saskatoon, Saskatchewan, MAKE OATH AND SAY:


1. We have been retained by counsel for the Plaintiffs in this proposed class proceeding to jointly provide our expert opinion to the Court for use at the Plaintiffs' application for certification of this proceeding as a class action.
2. Attached to this affidavit and marked as **Exhibit "A"** is a true copy of our joint expert report, dated February 28, 2024.
3. Attached to this affidavit and marked as **Exhibit "B"** is a true copy of Dr. Fehr's *curriculum vitae*.
4. Attached to this affidavit and marked as **Exhibit "C"** is a true copy of Dr. MacDonald's *curriculum vitae*.

5. We understand that, although we were retained by Plaintiffs' counsel to provide an expert report in this matter, our duty is to assist the Court and not advocate for any party. We certify that we are aware of our duty under King's Bench Rule 5-37 as follows:

- a. To provide opinion evidence that is objective and non-partisan;
- b. To provide opinion evidence that is related only to matters that are within the expert's area of expertise; and
- c. To provide any additional assistance that the Court may reasonably require to determine a matter in issue.

6. Our report was made in conformity with our duty under Rule 5-37. We will, if called on to give oral or written testimony, give that testimony in conformity with our duty.

SWORN (OR AFFIRMED) BEFORE ME  
at, Saskatoon, Saskatchewan,  
this 28<sup>th</sup> day of February,  
2024.

  
\_\_\_\_\_  
Notary Public for Saskatchewan

My appointment expires on: 31 March 2028

  
\_\_\_\_\_  
**Dr. Amanda Fehr**

  
\_\_\_\_\_  
**Dr. Katya MacDonald**



# History of the Ile-a-la-Crosse Residential School

February 28, 2024

By Amanda Fehr (PhD) and Katya MacDonald (PhD)

This is Exhibit "A" referred to in the  
affidavit of Dr. AMANDA FEHR  
and Dr. KATYA MACDONALD  
sworn before me at Saskatoon  
this 28 day off February 2024  
[Signature]  
Notary public for Saskatchewan  
Appointment expiration date: 31 March 2028

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## Request for Opinion & Professional Qualifications

We certify that we are aware that an expert's duty is to:

- (a) provide opinion evidence that is objective and non-partisan;
- (b) provide opinion evidence that is related only to matters that are within our area of expertise; and
- (c) provide any additional assistance that the Court may reasonably require to determine a matter in issue.

We certify that we have made this report in conformity with this duty, and that we will, if called on to give oral or written testimony, give that testimony in conformity with that duty.

### Professional Qualifications

**Amanda Fehr** is an historian with expertise in Canadian and Indigenous history. She received her M.A. in 2009 from the University of Saskatchewan, and her PhD in 2018 from the University of Saskatchewan. Her dissertation "*It was our lives, That was what we Believed*": Indigenous Histories of Catholicism in Northwest Saskatchewan was a community engaged, oral history project that specifically looked at Ile-a-la-Crosse, including histories of the residential school. Her training, teaching, and publications are listed in her *Curriculum Vitae*, a copy of which is appended in Schedule 3.

**Katya MacDonald** is an historian with expertise in Canadian and Indigenous history. She received her M.A. in 2010 and her PhD in 2017, both from the University of Saskatchewan. She has more than ten years' experience in community-engaged research related to the Ile-a-la-Crosse region, in addition to community-engaged oral history research experience with other Indigenous communities in Canada. Her PhD dissertation, "*Making Histories and Narrating Things: Histories of Handmade Objects in Two Indigenous Communities*," examined the twentieth-century social and community history of Ile-a-la-Crosse. Her education, research, publications, and related professional experience are listed in her *Curriculum Vitae*, a copy of which is appended in Schedule 3.

### Mandate

We have been retained by the Plaintiffs in ***Louis Gardiner et al. v. The Attorney General of Canada et al., KBG-SA-01263- 2022*** to provide expert evidence.

We have been requested to provide an expert report outlining the history of the Île-à-la-Crosse residential school (the "School") until its closure in 1972, including discussion of its governance, funding and administration, with particular regard to the role, if any, of the federal Government of Canada and provincial Government of Saskatchewan. We were also asked to comment on the experience of students at the Île-à-la-Crosse School until 1972, with particular regard to their physical and mental well-being and the School's impact on students' family members.

Our opinion is rendered jointly and this report is co-authored.

## Introduction

Throughout the 20th century history of the Ile-a-la-Crosse residential school (1910s-1970s), federal and provincial governments alike provided only inconsistent funding and oversight of the School. This inconsistency and willful inattention was driven by ongoing disagreement between the provincial and federal governments over who was responsible for the School. These governments disagreed over who should fund the School because of the difference in legal status between "Status Indians" (First Nations people with status under the federal *Indian Act*) and Métis and non-status First Nations people. However, the legal difference did not reflect the reality of how communities and families in northwestern Saskatchewan lived. In this report, we will outline the arbitrariness of the legal distinction that initially resulted from the Treaty 10 / Scrip Commission in 1906 and was perpetuated by the sexist provisions of the *Indian Act* that resulted in women and their children losing status, and explain how community members that took Treaty or Scrip did not understand how that choice would impact legal status and rights.

The Ile-a-la-Crosse school was operated by the Catholic order, the Oblates of Mary Immaculate ("OMI" or the "Oblates"), the same order that ran other residential schools that are recognized as "Indian Residential Schools" in the Indian Residential School Settlement Agreement (IRSSA), including the nearby Beauval Indian Residential School ("BIRS"). With inconsistent government funding for the Ile-a-la-Crosse school, the Oblates used funds and equipment from other Federal and Provincial institutions that they ran, as well as family allowance payments made to the parents of students at the Ile-a-la-Crosse school.

The Truth and Reconciliation Commission of Canada (TRC) concluded in *Volume One* (Parts 1 and 2) of its report that the Canadian residential school system amounted to cultural genocide, rather than just assimilation, and was inherently violent to students.<sup>1</sup> The Ile-a-la-Crosse school has been largely ignored in national narratives about the residential school experience, even though it is often cited as one of the earliest examples of a Residential School in western Canada. More specific references to the Ile-a-la-Crosse school and the experiences of Survivors can be found in more recent social and oral histories of Ile-a-la-Crosse, as well as the

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<sup>1</sup> The Truth and Reconciliation Commission of Canada, *Canada's Residential Schools. The History Part 1 Origins to 1939 The Final Report of the Truth and Reconciliation Commission of Canada. Volume 1, Part 1* (Kingston: Published for the Truth and Reconciliation Commission by McGill-Queen's University Press, 2015); The Truth and Reconciliation Commission of Canada, *Canada's Residential Schools. The History Part 2 1939-2000 The Final Report of the Truth and Reconciliation Commission of Canada. Volume 1, part 2* (Kingston: Published for the Truth and Reconciliation Commission by McGill-Queen's University Press, 2015). For a history of residential schools in Canada, see for example the foundational works by J.R. Miller and John Milloy. J.R. Miller, *Shingwauk's vision: A history of native residential schools*. (Toronto: University of Toronto Press, 1996); John Milloy, *A National Crime: The Canadian Government and the Residential School System 1879-1986* (Winnipeg: University of Manitoba Press, 1999). More recently scholars have drawn attention to the violence at the schools, see Ian Mosby "Administering Colonial Science: Nutrition Research and Human Biomedical Experimentation in Aboriginal Communities and Residential Schools, 1942-1952" *Histoire sociale/Social History*, XLVI, No. 91 (Mai/May 2013), pp. 615-642; Andrew Woolford, *This Benevolent Experiment: Indigenous Boarding Schools, Genocide, and Redress in Canada and the United States* (Winnipeg: University of Manitoba Press, 2015).

work of the Royal Commission on Aboriginal Peoples (RCAP), and multiple community hearings and events related to the School in Ile-a-la-Crosse.<sup>2</sup>

Where our expert opinions disagree with the work of the Truth and Reconciliation Commission is in regards to *Volume Three* of its report that looks at what they call the Metis experience. Unlike *Volume One* (Part 1 and Part II), *Volume Three* is considerably shorter and based on a limited assessment of often problematic secondary sources.<sup>3</sup> For example, looking at previously published accounts without providing context and when it includes recent survivor testimony, the analysis is dismissive of the harmful nature of residential schools, unlike the analysis provided in *Volume One*. In contrast our opinion is that the experiences of Survivors from Ile-a-la-Crosse that we have heard and read are best understood in the context of cultural genocide that the TRC outlines in *Volume One*.

Students who attended the School were subjected to an educational experience that included cultural genocide, violence, abuse, neglect and a low quality of education, in common with the Canadian Residential School experience recognized by the TRC) and historians. This educational experience would not have been acceptable in provincially funded schools in the south of the province. It is our opinion that the student experience at the unrecognized school in Ile-a-la-Crosse was in many ways the same as at the recognized residential schools, particularly neighboring Beauval Indian Residential School. The following report provides a detailed history of the School at Ile-a-la-Crosse and demonstrates how the experiences of Survivors at the School are part of the national history of residential schools, and that their exclusion from the Indian Residential School Settlement Agreement (IRSSA) was erroneous.

## Early History of the Ile-a-la-Crosse School

*In brief, the School in Ile-a-la-Crosse was founded in 1860, prior to Canadian Confederation in 1867, and was the first school in the region. After Canada became a country, the Oblates regularly petitioned the federal government to fund the School in Ile-a-la-Crosse, and received*

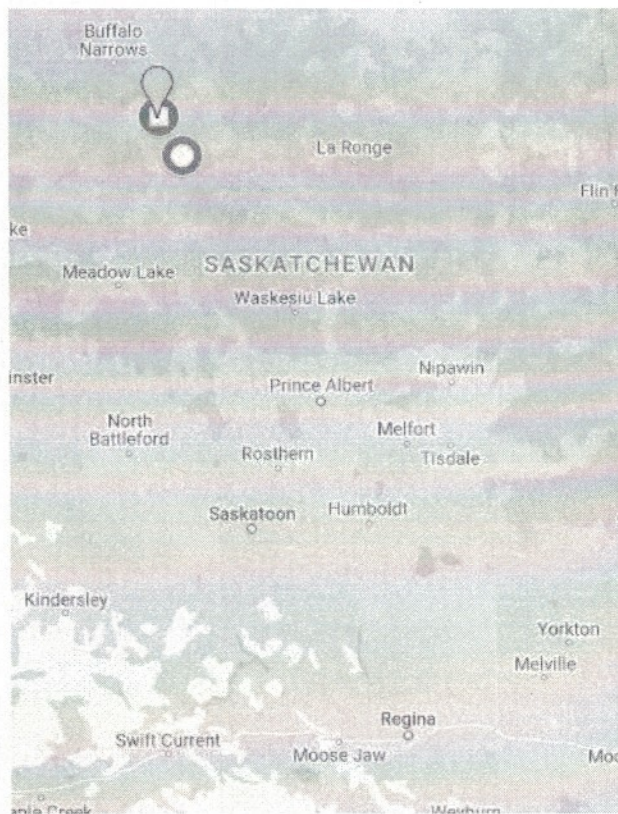
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<sup>2</sup> Much of the regional and local history of Ile-a-la-Crosse focuses on hunting and trapping rights and concludes with the signing of Treaty 10 in 1906. Tim Foran's dissertation and subsequent book looks at the history of the Oblate Mission in Ile-a-la-Crosse until 1906. See for Example, Timothy Foran, *Defining Métis: Catholic Missionaries and the Idea of Civilization in Northwestern Saskatchewan 1845-1898* (Winnipeg: University of Manitoba Press, 2017); Signa Daum Shanks' PhD dissertation *Searching for Sakitawak: Place and People in Northern Saskatchewan's Île-à-la-Crosse* (University of Waterloo, 2015) is a history of the community of Ile-a-la-Cross, focusing on the development of a unique local identity. Amanda Fehr considers the more recent history of the school in her 2018 dissertation. Amanda Fehr, *It was our lives, That was what we Believed": Indigenous Histories of Catholicism in Northwest Saskatchewan* (PhD Dissertation, University of Saskatchewan, 2018). The best sources for Survivor experiences are in recordings and reports related to RCAP, the TRC, as well as subsequent community events related to recognizing the Ile-a-la-Crosse School. See for example. [Ile-a-la-Crosse Hearing - NCTR Public](#), 2012; and Statements made at the Ile-a-la-Crosse Public Meeting Regarding the Residential School Claim, March 2015; Ile-a-la-Crosse Residential School Dialogue, Ile-a-la-Crosse, Saskatchewan, 8 September 2016.

<sup>3</sup> *The Métis Experience: The Final Report of the Truth and Reconciliation Commission of Canada. Volume 3* (Kingston: Published for the Truth and Reconciliation Commission by McGill-Queen's University Press, 2015)

annual funding from 1898 until the School relocated to La Plonge and was renamed the Beauval Indian Residential School in 1906.

Ile-a-la-Crosse or *Sakitawak* was a meeting place for the Cree and Dene prior to the arrival of traders, becoming the logical place for a trading post in 1776, as well as the Catholic Oblate of Mary Immaculate Mission in 1846. The families who today make up northwestern communities such as Ile-a-la-Crosse, Canoe Lake, Dillon, Buffalo Narrows, La Loche, Pine House, and Patuanak lived in smaller family settlements around the watershed as far north as Cree Lake. A map of the region is provided in Figure 1. It was not until the late 1960s, but mostly in the 1970s, that people began to live in the settlements at places like Ile-a-la-Crosse, primarily relocating for schooling reasons. Today, Survivors of the Ile-a-la-Crosse school reside in communities across the province and beyond.



**Figure 1: Location of Ile-a-la-Crosse (square marker) and Beauval (circle marker) within Saskatchewan**

The Grey Nuns, a Catholic religious order that often worked closely with the Oblates, ran a small boarding school in Ile-a-la-Crosse that had fifteen pupils when it opened in 1860.<sup>4</sup> From the 1870s to the 1890s, the Oblates regularly petitioned the new Canadian Federal Government

<sup>4</sup> Historian J.R. Miller has noted that the Catholic Oblates were often able to run residential schools at lower costs than protestants because they could rely on the free labour of the female orders such as the Grey Nuns to teach rather than needing to hire teachers. See Miller, *Shingwauk's Vision*.

and later the Department of Indian Affairs for funding for the School, then known as Notre-Dame du Sacré Cœur. In his PhD dissertation on the Oblate Mission in Ile-a-la-Crosse during the 19th century, historian Tim Foran outlines these requests, including garnering \$300 per year in 1875 and 1876. However, with the signing of Treaty 6 in 1876, the School at Ile-a-la-Crosse was regularly denied funding as it was outside of the treaty boundary.<sup>5</sup>

Over twenty years later, in 1897, the federal government officially provided funding for the School in Ile-a-la-Crosse, integrating it into the federal residential school system. As Foran explains, “the department recognized Notre-Dame du Sacré Cœur as a boarding school and accepted to disburse per capita grants of \$72.00 per annum for twelve of its “Indian boarders.”<sup>6</sup> As a treaty had yet to be negotiated in the region, the Oblates unilaterally determined which students to identify as “Indian boarders.” The school received its first federal payment of \$864.00 in the spring of 1898, and the funding continued at that rate.<sup>7</sup> In September 1906, the School was relocated to La Plonge across the Beaver River near Beauval, due to flooding in Ile-a-la-Crosse; the school at La Plonge became the Beauval Indian Residential School. A separate school was reopened in Ile-a-la-Crosse by 1917.<sup>8</sup>

Timelines provided in the TRC’s 2015 history of the residential school system, *A Knock on the Door*, acknowledge the School in Ile-a-la-Crosse as one of first residential schools established in Canada, enabling the authors to establish a longer history of residential schools in Canada.<sup>9</sup> However, the book later notes that the school became known as Beauval: an inaccuracy that erases the continued existence of the school in Ile-a-la-Crosse. Because of frequent closings and reopenings of the schools, the timeline of the school in Ile-a-la-Crosse is more complex. A timeline of key events in the history of the Ile-a-la-Crosse school is provided in Schedule 2.

Metis, Dene and Cree children from La Loche to Pinehouse to Cree Lake attended the residential school in Ile-a-la-Crosse between 1860 and 1972, when the School burned down for the final time (although it was not until 1976 that the residence officially closed and the Catholic Church transferred control of the School to the local school authority).<sup>10</sup>

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<sup>5</sup> Timothy Foran, “‘Les Gens De Cette Place’: Oblates And The Evolving Concept Of *Métis* At Île-À-La-Crosse, 1845-1898,” (PhD Dissertation, University of Ottawa, 2011).

<sup>6</sup> Foran, “‘Les Gens De Cette Place,” 195.

<sup>7</sup> See for example, Accountant Memorandum for the Deputy Supt. General of Indian Affairs, 5 May 1904 “General Housekeeping Records and Correspondence regarding Ile-a-la-Crosse Treaty (maps and charts), 1883-1905,” RG10, vol. 4009, file 241-209-1, Item 112, LAC.

<sup>8</sup> The school in Ile-a-la-Crosse has had many names. For the purposes of this report, we will refer to it as the Ile-a-la-Crosse school.

<sup>9</sup> Phil Fontaine, Amy Craft, and the Truth and Reconciliation Commission of Canada, *A Knock on the Door: The Essential History of Residential Schools from the Truth and Reconciliation Commission of Canada* (Winnipeg: University of Manitoba Press, 2015).

<sup>10</sup> “The Religious History of St John the Baptiste Parish, Île-à-la-Crosse, 150 years,” Archdiocese of Keewatin-Le Pas, 1996, accessed 10 February 2017 <http://Desjarlais.jkcc.com/rcindex.html>

## Education and Treaty 10 Negotiations

*The Treaty 10 Commission in 1906 relates to the School in Ile-a-la-Crosse for two reasons. First, the absence of a treaty impacted the funding of the School, so the Oblates regularly petitioned the Federal Government for a Treaty / Scrip Commission. The second issue is the relationship between the Treaty / Scrip commission and the allocation of Indian status in the region that determined who was placed under federal jurisdiction. It is our opinion that the arbitrariness and ambiguity of who took Treaty, resulting in falling under federal jurisdiction, and who took Scrip, resulting in falling under provincial jurisdictions, is necessary to understand the jurisdictional debate between the province and federal government, as well as community and Survivor understandings. Jurisdictional, community, and Survivor histories demonstrate that the school in Ile-a-la-Crosse was no different from that in Beauval, other than suffering from more government neglect.*

From 1883, the Oblates regularly petitioned the federal government to sign a treaty in what is now Northwestern Saskatchewan – “Treaty 10”.<sup>11</sup> In advocating to the government for a treaty to be signed, the Oblates anticipated receiving more regular support for boarding schools they operated in the northwest. This is apparent both in missionary requests for support for the school at Ile-a-la-Crosse, as well as in Treaty Commissioner J.A. McKenna’s notes regarding the negotiations. In addition to petitioning for treaty and scrip in the region, the Oblates categorized whether Indigenous people in the region should be considered Chipewyan, Cree, or “Halfbreeds.” Scrip was the government’s way of dealing with the Aboriginal title of the Metis. Rather than a collective agreement, individuals were offered a certificate for land or money scrip.

In a 1907 report on the negotiations, McKenna suggests that individuals could choose whether to be treated as Indians or take scrip as “Halfbreeds.” This element of personal choice was especially significant, as there was little that the government could do to determine who was an Indian and who was Metis. McKenna stated in his report on the 1906 commission that “It is difficult to draw a line of demarcation between those who classed themselves as Indians and those who elected to be treated with as half-breeds. Both dress alike and follow the same mode of life.”<sup>12</sup> Complicating this choice, speculators, including church officials encouraged some community members regardless of cultural and familial identity to take scrip.<sup>13</sup> Beyond this, the

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<sup>11</sup> For example, see Mission de l’Ile-a-la-Crosse, au tres honourable Sir J Macdonald, 28 Juillet 1883, General Housekeeping Records And Correspondence Regarding Ile-A-La-Crosse Treaty. (Maps And Charts), Volume 4006, File no. 241209-1, Library and Archives Canada; From Rapet, Ile-a-la-Crosse, to Monsieur Garnot, 13 February 1902, in General Housekeeping Records And Correspondence Regarding Ile-A-La-Crosse Treaty. (Maps And Charts), Volume 4006, File no. 241209-1, Library and Archives Canada; From Rapet, Ile-a-la-Crosse, to Monsieur Garnot, 7 April 1902, in General Housekeeping Records And Correspondence Regarding Ile-A-La-Crosse Treaty. (Maps And Charts), Volume 4006, File no. 241209-1, Library and Archives Canada.

<sup>12</sup> J. A. McKenna, Commissioner, to The Hon Frank Oliver, Superintendent General of Indian Affairs, Ottawa, 18 January 1907.

<sup>13</sup> Father J.B. Ducharme “Report on the Indian and Half-breed Question,” As quoted in *The Dene Elders Project: Stories and History from the Westside*, volume 2, produced by Lynda Holland and Marry Ann Kkailther (La Ronge: Holland-Dalby Educational Consulting,

oral history record has consistently stressed that community members understood the primary difference between taking Treaty and Scrip not as one of personal identity, but rather as picking between a larger one-time payment or a smaller payment every year, with the promises related to hunting, fishing, education etc. would apply to everyone.<sup>14</sup>

The records of the treaty/scrip commission and the oral histories draw attention to the ambiguity involved in the process of differentiating who would be classed as "Indians" under the *Indian Act* and therefore under federal jurisdiction and who would be considered Metis, without Indian status and often caught between federal and provincial jurisdictions. These legal categories that cut across families would later impact the rights that were recognized, resources from the federal government, what residential school individuals attended, and most recently, if that residential school would be recognized in the Indian Residential School Settlement Agreement. This was further exacerbated by the sexist provisions of the *Indian Act* that resulted in women and children losing status because of intermarriage. This means that within the same family, there were people who had Indian Status and others who didn't - even though their lifestyles, cultures, and family histories were the same.

Most people who did not have status were sent to the School in Ile-a-la-Crosse, although some went to Beauval. Relatedly, most people with status were sent to Beauval, but some went to Ile-a-la-Crosse. Just like the people who attended the Treaty / Scrip Commissions in 1906 did not understand that taking Treaty or Scrip would impact hunting rights, neither did they understand the different jurisdictions it would place their children under for schooling. Because the schools in Ile-a-la-Crosse and Beauval were administered and run by the same religious order, people in the northwest understood them both to be the same.

## Ambiguous Jurisdiction (1906-1946)

*Provincial governments prior to the election of the CCF in 1944 largely ignored the northern part of the province. The federal government understood their responsibility to be strictly in relation to Treaty/status "Indians" and expected Metis people in the north to fall under the province's jurisdiction. These jurisdictional discrepancies meant that education in Ile-a-la-Crosse was not systematically provided or funded by either government, although the Oblates were able to obtain funding from a variety of governmental sources through the years. This lack of funding*

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2003). p. 110.

<sup>14</sup> See for example: Mr. Brian Ratt, "Royal Commission on Aboriginal Peoples 95: L.A.C. Community Hall, Ile-a-la-Crosse, Saskatchewan," (December 8<sup>th</sup> 1992) RCAP vol. 95 (Box 15), Native Law Centre Fonds, University of Saskatchewan Archives, pp. 262-263.; Gilbert McCallum, The Virtual Museum of Métis History and Culture, [www.metismuseum.ca](http://www.metismuseum.ca); Métis Nation Land and Resources," in Royal Commission on Aboriginal People [RCAP], v. 4 Perspectives and Realities (Ottawa: RCAP, 1996), p. 336, 337.; Max Morin, Interview with Amanda Fehr, Ile-a-la-Crosse, 15 July 2014.; Ross Cummings," In *The Dene Elders Project: Stories and History From the Westside*, p. 74.; Ross Cummings, Interview with Clément Chartier, July 1976 Métis Nation of Saskatchewan Archive as quoted in "Métis Nation Land and Resources." p 337.; Ibid. For similar statements by Elders on Métis rights to hunt and fish see Marie Rose McCallum and Robbie Fontaine as quoted in "Métis Nation Land and Resources." p. 338.

*disproportionately affected students at the Ile-a-la-Crosse school because of the legal ambiguities described above, related to identifying who was Treaty as opposed to Metis.*

Minimal academic scholarship or historical records are readily accessible to provide insight into the Ile-a-la-Crosse school context between Saskatchewan's founding as a province (1905) and the signing of Treaty 10 (1906) and the election of the Cooperative Commonwealth Federation (CCF) government in 1944. The report of the 1996 Royal Commission on Aboriginal People (RCAP) concluded that the CCF was the first provincial government to pay concerted attention – either positive or negative – to Indigenous peoples in the northern part of the province, whether they were First Nations and therefore a federal responsibility, or Metis, who, at the same time, fell under the province's jurisdiction.<sup>15</sup>

The RCAP report notes that prior to 1944, where Indigenous people in the north did interact with the provincial government was through the education system.<sup>16</sup> In practice, in the isolated communities of northern Saskatchewan, Indigenous people had limited access to services such as education, health, and social assistance for much of the first four decades of the twentieth century.<sup>17</sup> Although the province was responsible for the education of the Metis students in the north, there was no systematic provision of education by the province in that region. The province made little move to fulfill their responsibilities until settlers began to arrive in the north in larger numbers in the 1930s.<sup>18</sup>

## Changes in Jurisdiction, Funding, and School Conditions in the 1920s-1940s

*During this period, Saskatchewan accepted at least partial responsibility for funding and overseeing the School, as evidenced by provincial funds sent to the School to supplement its operations, and the province's oversight of Ile-a-la-Crosse school teacher qualifications. However, until 1941, the province argued that the federal government was responsible for educating both First Nations and Metis children. The province also advocated from 1936 onwards that the Ile-a-la-Crosse school, specifically, should not be provincially funded. This ambiguity created unstable and insufficient conditions for the Ile-a-la-Crosse school.*

There were fires at the Ile-a-la-Crosse school in 1920 and 1925, and in April 1928 the Mission expanded by taking over the Government Hospital. In Ile-a-la-Crosse, school records from 1929 suggest a pattern of significantly fluctuating attendance and enrolment; most pupils attended

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<sup>15</sup> ROYAL COMMISSION ON ABORIGINAL PEOPLES CANADIAN GOVERNMENT AND ABORIGINAL PEOPLES PROJECT THE CASE OF SASKATCHEWAN-ABORIGINAL RELATIONS, 14.

<sup>16</sup> ROYAL COMMISSION ON ABORIGINAL PEOPLES CANADIAN GOVERNMENT AND ABORIGINAL PEOPLES PROJECT THE CASE OF SASKATCHEWAN-ABORIGINAL RELATIONS, 14.

<sup>17</sup> ROYAL COMMISSION ON ABORIGINAL PEOPLES CANADIAN GOVERNMENT AND ABORIGINAL PEOPLES PROJECT THE CASE OF SASKATCHEWAN-ABORIGINAL RELATIONS, 45.

<sup>18</sup> ROYAL COMMISSION ON ABORIGINAL PEOPLES CANADIAN GOVERNMENT AND ABORIGINAL PEOPLES PROJECT THE CASE OF SASKATCHEWAN-ABORIGINAL RELATIONS, 47.

between 160 and 200 or more days of school (for comparison, the current school year in Saskatchewan is 197 days), but 25% attended fewer than 140 days, and within that, 13% attended fewer than 40 days.<sup>19</sup> These numbers suggest that oversight of the School – by any jurisdiction – was minimal, and few efforts were made to address reasons that a significant percentage of students rarely attended school. Because of this lack of attention, many children would not have received a quality education, despite being enrolled in the School. Recorded reasons for not attending included illness and inclement weather, but these factors were likely exacerbated by the fact that the School did not pay for transportation costs for children to attend,<sup>20</sup> although many of them lived across the lake or in distant or seasonal communities, and participated in subsistence activities with their families.

Regarding the Ile-a-la-Crosse school during this period, the documents in the Saskatchewan Archives Board microfilm reel “Northern Areas 17, Half-Yearly Returns - Northern Areas -- Isle a la Crosse, 06/00/1921 - 06/00/1969, Reel R-2.967” may provide insight into the status of grants for students in Ile-a-la-Crosse; however, the scans of these documents are not legible. Staff at the Saskatchewan Archives Board have informed us that the microfilm itself is damaged, so the information contained on the reel is inaccessible. The 1929 attendance records described above are the only legible records available from this reel. They are solely a numerical ledger and do not provide additional explanation of whether attendance varied based on whether the students were boarders or day students; these details, too, may be further explained in the illegible records. However, the 1929 example provides a snapshot of evidence of school conditions during a period when few other historical records relating to the School are available.

In July of 1928, a briefing to Saskatchewan’s lieutenant governor stated that taxation did not adequately cover the operating costs of the Ile-a-la-Crosse school, and so the School was requesting a grant to cover the salary of a teacher for 10 months at \$125 per month. The ministry of education had recommended granting these funds.<sup>21</sup> Subsequently, a November 1928 letter from the Registrar from the provincial ministry of education to Father Rossignol of the Ile-a-la-Crosse school notes that the province had been paying a special grant to the School “for some time,” and because of this provincial involvement, the province sought verification of a teacher’s name and the provincial teaching certification that she held.<sup>22</sup> This suggests a distinct relationship between the province and the mission school that did not necessarily follow the pattern of other schools (whether provincially or federally funded) in the region, with funding and resources based on requests from the Mission rather than on dedicated and consistent funding. The correspondence between Rossignol and the province does indicate the province’s acceptance of responsibility for at least partially funding and overseeing the School at that time.

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<sup>19</sup> Saskatchewan Department of Education Annual Return of the Isle a la Crosse School Division, 1929-1930, R.77.10/10, SAB

<sup>20</sup> Saskatchewan Department of Education Annual Return of the Isle a la Crosse School Division, 1929-1930, R.77.10/10, SAB

<sup>21</sup> Clerk of the Executive Council to Lieutenant Governor, July 13, 1928. R.77.10/10, SAB.

<sup>22</sup> Registrar, Saskatchewan Ministry of Education to Father Rossignol, November 27, 1928. R.77.10/10, SAB.

During the Great Depression of the 1930s, subsistence activities remained prevalent in the community, somewhat insulating local people from economic strain. The mission and school at Ile-a-la-Crosse did experience these strains, however, and during this time period were maintained by volunteer Ile-a-la-Crosse community member labour solicited by the mission. In 1939 provincial official J. H. McKechnie noted Ile-a-la-Crosse community members' economic stability in the face of global economic decline, and recommended that the School should remain independent of other school boards and provincial funds. Although the province engaged in some oversight of teacher's qualifications, they did not fund the School on a consistent basis. Saskatchewan maintained this policy until the election of the CCF government in 1944.

The RCAP report describes a 1944 report that made recommendations for improving economic and social conditions in northern Saskatchewan, including the recommendation that the province assume full responsibility for northern education, with schools funded solely by the province (and not by the federal government or by churches).<sup>23</sup> While the CCF accepted this recommendation and did build schools and hire teachers in some parts of the north, the RCAP report notes that even after the election of the CCF and that government's more concerted attention to those services, "service delivery has often been haphazard, and remains a concern to both First Nations and Metis"<sup>24 25</sup>

The Depression of the 1930s forced the province to address Metis schooling due to a growing Metis population, but because many Metis people lived in poverty, in regions such as northern Saskatchewan that had concentrated Metis populations, the Province argued there was not a sufficient tax base to fund schools appropriately. Additionally, jurisdictional negotiations between Saskatchewan and Canada led to ongoing gaps in school funding and upkeep: by 1938, province-wide, thousands of Indigenous children – First Nations and Metis alike – were not attending school because the province argued that educating both First Nations and Metis was a federal responsibility.<sup>26</sup> In 1941, the province began providing educational grants for Metis children to attend school (\$2 per child), but these were limited to vocational education only.<sup>27</sup> As with the federal residential school system, the province's approach to Metis education focused on student labour rather than providing a comparable education to other provincially run schools.

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<sup>23</sup> ROYAL COMMISSION ON ABORIGINAL PEOPLES CANADIAN GOVERNMENT AND ABORIGINAL PEOPLES PROJECT THE CASE OF SASKATCHEWAN-ABORIGINAL RELATIONS, 47.

<sup>24</sup> ROYAL COMMISSION ON ABORIGINAL PEOPLES CANADIAN GOVERNMENT AND ABORIGINAL PEOPLES PROJECT THE CASE OF SASKATCHEWAN-ABORIGINAL RELATIONS, 45.

<sup>25</sup> Changes to the contexts surrounding the Ile-a-la-Crosse school during the years of the CCF government are detailed below.

<sup>26</sup> ROYAL COMMISSION ON ABORIGINAL PEOPLES CANADIAN GOVERNMENT AND ABORIGINAL PEOPLES PROJECT THE CASE OF SASKATCHEWAN-ABORIGINAL RELATIONS, 47.

<sup>27</sup> ROYAL COMMISSION ON ABORIGINAL PEOPLES CANADIAN GOVERNMENT AND ABORIGINAL PEOPLES PROJECT THE CASE OF SASKATCHEWAN-ABORIGINAL RELATIONS, 47.

## Family Allowance Payments & Federal Involvement

*As has been well documented in the broader history of Residential Schools, since 1945, Canada Family Allowance Payments were used by the Oblates to compel families to send their children to the schools in Ile-a-la-Crosse and Beauval. For community members there would have been no apparent differences between the schools. Furthermore, the use of Family Allowance Payments (and the associated use of RCMP officers to compel attendance at Ile-a-la-Crosse), as well as sharing equipment between the schools, and using funds from the hospital were ways for the Oblates to use federal dollars to fill financial gaps left by provincial neglect.*

In 1945, the federal government introduced family allowance payments for families. Family allowance was paid out via cheque to mothers, on a per-child basis. For children of school age, school attendance was required in order to receive family allowance payments.<sup>28</sup> Throughout the twentieth century, the Oblates have noted the inadequacy of government funding for the school in Ile-a-la-Crosse, and the lack of provincial interest in the School until the early 1970s. To fill these gaps, the Mission relied on its other assets and after 1945, appropriation of federal Family Allowance payments.

The role of the family allowance and the mission's use of various funds to operate the School was noted in the oral and archival record. Payments of the federal family allowance plan began in 1945, and this was used to compel parents to send their children to the residential schools, including Ile-a-la-Crosse and Beauval.<sup>29</sup> Historian David Quiring's work extensively reviews provincial archival records related to northern Saskatchewan. The provincial records show the changes in Ile-a-la-Crosse that resulted from the introduction of the family allowance (and particularly the school attendance requirement of the allowance): families moved more permanently to the community, which meant that they were further removed from hunting and trapping livelihoods.

As a result of moving to town for school attendance, families became increasingly dependent on family allowance payments – and therefore school attendance – for survival as a result. However, the provincial records do not clearly demonstrate the *impact* to community members of the changes brought about by the introduction of the family allowance, and its use to coerce families to send their children to the school in Ile-a-la-Crosse. The oral history and testimony of community members provides important insights into how this policy and practice impacted Indigenous peoples.

In particular, oral histories state that for students who boarded at the School, family allowance payments would sometimes go directly to the Mission, rather than to the families. We find that there is continuity in the oral history regarding the impact of this policy that is well documented

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<sup>28</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 45.

<sup>29</sup> David Quiring, *CCF Colonialism in Northern Saskatchewan: Battling Parish Priests, Bootleggers, and Fur Sharks* (Vancouver: UBC Press, 2004), p. 188.

in the archival record. For example Clément Chartier explained, “well, yeah, it’s [pause] see it used to be common knowledge that the mission would get the family allowance for the kids that were there. How we knew I don’t know it was just common knowledge.”

During an interview in 2014 Max Morin drew attention to family allowance payments, as well as other ways that the Federal and Provincial governments provided financial support for the residential school in Ile-a-la-Crosse. This typically occurred through contributions (such as Family Allowance payments) and through sharing equipment and resources (like the generator for the power that served the hospital and the School that were both mission run. Additionally, Mr. Morin explained that the staff who were running the School were at times paid from the hospital budget which included money and in kind contributions from the federal and provincial governments. In addition to the financial contributions that the provincial and federal governments made to the hospital and therefore the School, Mr. Morin noted the significance of the threat of removing children if they were not sent to school. Mr. Morin explained, “and the reason why we were in school, my dad had a mink ranch across and was seven or eight kilometers away and so either you put your kids in school or they’ll be taken away by social services. That’s what the elders told me, and I don’t think the elders would lie and also they had these generators, they had power in the hospital, in the School, in that area and the generators were provided by the federal government.”<sup>30</sup>

The priests were often the primary point of contact between distant governments in Regina and Ottawa and the people of the northwest. That political power of the priests plus their ability to call upon the RCMP, and threaten to cut off federal family allowance payments resulted in local understandings of federal involvement in the school in Ile-a-la-Crosse. Furthermore, this process for coercing families to send their children to the school in Ile-a-la-Crosse was the same that was used by the Oblates and RCMP to force families to send their children to the school at Beauval and has more generally been widely documented in the history of residential schools.<sup>31</sup>

## The CCF and Provincial Involvement (1946-1975)

*Provincial funding for the Ile-a-la-Crosse school during the CCF years was inconsistent. The province continued to occupy a paradoxical approach to the Ile-a-la-Crosse school in particular:*

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<sup>30</sup> Max Morin, 15 July 2014. Clément Chartier, Interview with Amanda Fehr, Ottawa, 14 January 2014. See also: Buckley Belanger, Personal Conversation, August 2013; Liz Durocher, Personal Conversation, 2012; Eliza Aubichon, Interview with Amanda Fehr, Ile-a-la-Crosse, October 2012; Duane Favel, Interview with Amanda Fehr, Ile-a-la-Crosse, 16 July 2014; Margaret McIntyre, Interview with Amanda Fehr, English River First Nation; and Statements made at the Ile-a-la-Crosse Public Meeting Regarding the Residential School Claim, March 2015; Ile-a-la-Crosse Residential School Dialogue, Ile-a-la-Crosse, Saskatchewan, 8 September 2016.

<sup>31</sup> See for example, The Truth and Reconciliation Commission of Canada, *Canada’s Residential Schools. The History Part 2 1939-2000 The Final Report of the Truth and Reconciliation Commission of Canada. Volume 1, part 2* (Kingston: Published for the Truth and Reconciliation Commission by McGill-Queen’s University Press, 2015).

*relying on insufficient funds to maintain the School, and then haphazardly (in comparison to schools in the less isolated southern half of the province) seeking to fill gaps through specialized arrangements with the Mission. This meant that students did not receive comparable educational resources to children in other parts of the province during this time period. These funding decisions were intentional on the part of the provincial government. Additionally, because federal family allowance payments were contingent upon school attendance, families living in poverty who relied on these payments for survival were functionally forced to send their children to the Ile-a-la-Crosse school. Although the province underfunded the School, until the mid-to-late 1970s they also resisted granting the School the same autonomy in decision-making that other schools in the province had. This lack of autonomy did not correlate to closer oversight by the province. The province both underfunded the School, yet also prevented the School from having decision-making authority over ways to improve school conditions.*

With the election of the first CCF government in 1944, the province assumed responsibility for funding education throughout the province, including in the underserved north. Upon election, the CCF began the process of coordinating programs in the north, establishing an administrator for northern education.<sup>32</sup> Alongside the province stepping into the role of funding schools, they also began to address economic concerns in the north, which directly influenced how, why, and when students attended the Ile-a-la-Crosse school.

The CCF pressured families to move to permanent settlements, by increasing services in those settlements that could only be accessed there, and introducing harvesting and trapping regulations that prevented or discouraged movement.<sup>33</sup> This push towards permanent settlements required families to choose between access to services and maintaining existing modes of making a living. These economic pressures therefore affected school attendance significantly. Conflicting federal and provincial policies around school attendance meant that attendance at the Ile-a-la-Crosse school was not driven by government oversight of the School, but by economic need. The family allowance policy that children must attend school in order to receive the allowance was directly at odds with the provincial Schools Act, which only required attendance at school for children living within 2.5 miles of a school.<sup>34</sup> Many children in the Ile-a-la-Crosse region lived outside this zone, but because the family allowance payments were a significant source of income for families living in poverty, school attendance became important for families' survival.

It was not only educational policies during this time period that contributed to families being functionally compelled to send their children to the Ile-a-la-Crosse school. A range of other provincial policies exacerbated this pattern. Citing concerns about the "overuse" of welfare in Ile-a-la-Crosse, in 1948 the CCF Northern Administrator used data from the Saskatchewan Fur

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<sup>32</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 26-27.

<sup>33</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 47.

<sup>34</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 243.

Marketing Service to justify cuts to welfare at Ile-a-la-Crosse.<sup>35</sup> This pattern was further reinforced in the late 1950s and early 1960s when the provincial Department of Northern Resources negotiated with provincial social welfare to pay lower food allowances in the north than in the south.<sup>36</sup> By undercutting families' ability to receive provincial services, the province caused school attendance to be less of a choice than a necessity.

At the same time, new taxation policies under the CCF led to underfunding of local schools. In 1948 they began to collect property tax in northern communities, which included an education tax; however, widespread local poverty prevented significant taxes from being collected, resulting in services including education being perpetually underfunded.<sup>37</sup> Furthermore, other provincial policies actively prevented the mission from supporting the School when provincial funding was insufficient. In 1948, the CCF introduced a policy to prevent missions and schools from harvesting trees for lumber; missions could now only cut timber if they cut an equal amount for local people. Father Remy of the Ile-a-la-Crosse mission complained directly.<sup>38</sup> Thus, the School was both underfunded through taxation, but also encountered barriers from the province to maintaining their facilities through other means. Therefore, this policy led to further detriment to students' experiences at the School. In the 1960s, the province also made special arrangements with the Ile-a-la-Crosse school to subsidize the mission school, when the mission, supported by the Liberal MLA at the time, resisted a CCF intention to build a secular school in the community. In response, the province agreed in 1961 to rent classroom space from the mission, pay teachers' salaries according to the provincial salary grid, and subsidize student boarding.<sup>39</sup> These examples demonstrate that the province continued to occupy a paradoxical approach to the Ile-a-la-Crosse school in particular: relying on insufficient funds to maintain the School, and then haphazardly (in comparison to schools in the south) seeking to fill gaps through specialized arrangements with the mission. Provincial policies not only underfunded the School but also prevented other entities (in this case the mission) from adequately supplementing provincial funding -- leading to a poorer student experience overall.

This disjointed funding pattern continued in other ways during this time period. In the 1960s the federal government provided grants to the Ile-a-la-Crosse school library. Status First Nations students were on record as attending the School, so the province argued that it did not need to contribute further to the School. However, the federal funds were directed specifically to one

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<sup>35</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 193.

<sup>36</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 188.

<sup>37</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 63.

<sup>38</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 211.

<sup>39</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 244. Quiring does not state the actual costs of subsidizing boarders.

school resource, the library, not to the funding, maintenance, and oversight of the School as a whole. Funding remained piecemeal.<sup>40</sup>

This patchy approach to funding and oversight continued into the latter decades of the 20th century. In 1972, the NDP government created the Department of Northern Saskatchewan (DNS), which was intended to function as a catch-all to provide services to northern residents. DNS took over 8 departments: natural resources, mineral resources, education, social services, co-operatives, public health, agriculture, and government services.<sup>41</sup> In a report by DNS in the mid 1970s,<sup>42</sup> DNS outlined a brief administrative history of school boards and school capital assets in the north. Until 1944 (the election of the CCF), churches built most schools, a role that, from 1944-65, was taken over by the provincial departments of Education and Public Works. From 1973 onwards, school construction was under the oversight of DNS.<sup>43</sup> This timeline coincides with the Ile-a-la-Crosse takeover of the School and the subsequent construction of a new school building under local control after a fire in 1972. The DNS report focuses specifically on the Northern School Board (one of four school boards in the north at that time, another being the Ile-a-la-Crosse School Board), but also notes: "All other school boards in the province, with the exception of Ile-a-la-Crosse, have control of their own building projects and the budget controlling them."<sup>44</sup> In other words, the report comments that only the Northern School Board and Ile-a-la-Crosse School Board did not have decision making power over school operations and assets, but neither did they receive sufficient provincial resources that might justify this lack of autonomy.

The report's comments align with other funding and oversight patterns of the School during this time period. In the case of the NSB, DNS declined to transfer assets to the School board, arguing that this would be complicated because of cost sharing with the federal Department of Indian Affairs, and the fact that DNS maintained fire insurance and paid those premiums.<sup>45</sup> While the report is not explicit about parallel procedures in Ile-a-la-Crosse, it does cite the two boards as exceptions within the province, suggesting that in Ile-a-la-Crosse, too, DNS maintained unusually close oversight of the Ile-a-la-Crosse school operations in the early 1970s, a contrast from earlier hands-off approaches. However, the oversight of school operations did not mean that the School received sufficient funding, and this increase in centralized oversight meant that the School had less decision-making power and was less responsive to local needs.

In 1971, the New Democratic Party (NDP) premier Allan Blakeney was elected. Blakeney argued that the Ile-a-la-Crosse school had functioned best when it received minimal assistance from the province. In 1972, he offered provincial funding to the School because, according to

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<sup>40</sup> David M Quiring, "Battling Parish Priests, Bootleggers, And Fur Sharks: CCF Colonialism In Northern Saskatchewan," PhD diss., University of Saskatchewan, 2002, 83.

<sup>41</sup> Quiring, David, *CCF colonialism in northern Saskatchewan: battling parish priests, bootleggers, and fur sharks* (Vancouver: UBC Press, 2004), 44.

<sup>42</sup> The exact date is not given in the archival source, but is likely obtainable from the Saskatchewan Archives if needed.

<sup>43</sup> DNS-1, File II-A-40-A, SAB

<sup>44</sup> DNS-1, File II-A-40-A, SAB

<sup>45</sup> DNS-1, File II-A-40-A, SAB

the NDP government, Canada was not fulfilling its obligations by not keeping good records or oversight over the Ile-a-la-Crosse school. The province continued to take the position that the School was a federal responsibility, but decided to step in, given the federal neglect. However, as described above, neither federal nor provincial governments throughout the 20th century had provided systematic funding or oversight to the School.<sup>46</sup>

## Local Control of the School

*The movement towards local control and community discussions regarding the colonial nature of the school in Ile-a-la-Crosse illustrate the poor conditions in the School leading up to that point. The Ile-a-la-Crosse movement for local control fits within the broader history of residential schools in Canada with Indigenous communities advocating to take over schools from Churches and the Federal Government.*

Responding to a century of grievances with the School and its operations, some community members in Ile-a-la-Crosse moved to take control of the School from the mission in the 1970s. Local Metis leaders Jim Favel and Vital Morin were involved in advocating for local control. Both of these men drew attention to the realities of colonialism and racism that lead them to advocate for change.<sup>47</sup>

The Mission resisted the movement towards local control over the school in Ile-a-la-Crosse in 1973, and began a separate, temporary mission run school in November of 1974 with 120 students. By March of 1975, most of the students had returned to the Ile-a-la-Crosse school and fourteen teachers were recruited from across western Canada.<sup>48</sup> A local report completed for the Royal Commission on Aboriginal Peoples in 1993 noted: "It is still the only community in the north with an independent, community controlled school—achieved despite tremendous resistance from the church and from the government. The school serves as a symbol of the commitment of the community to struggle for the right to run its own institutions."<sup>49</sup>

## Exclusion from the IRSSA

*The exclusion of the Ile-a-la-Crosse school from the Indian Residential School Settlement Agreement (IRSSA) resulted in Survivors of that school being excluded from Canada's efforts at reconciliation. As Survivors see their experiences as parallel to those that attended recognized*

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<sup>46</sup> "Statement by A. E. Blakeney to Department of Northern Saskatchewan Staff Conference, Prince Albert, December 12, 1972," SAB. cited in Daum Shanks 293.

<sup>47</sup> Dennis Gruending, "Dispute Disrupts Ile-a-la-Crosse Community," *Globe and Mail* republished in *Prairie Messenger*, Saskatchewan Catholic Weekly. vol 52, no. 45 April 13 1975.

<sup>48</sup> Natives Win School Control Vote," Article Clipping from 1970s provided by Tony Durocher in 2014.

<sup>49</sup> Bob Bouvier, Carlos Daigneault, Dwayne Desjarlais, Lillian Mclean, Jolene Roy Marie, Symes-Grehan, "Ile-a-la-Crosse Community Study For The Royal Commission On Aboriginal Peoples: Governance Study October 1993," The guiding committee for the report included: Buckley Belanger, Alex Bouvier, Dale Daigneault, Antoinette Desjarlais, Irene Desjarlais, Marie Adele Desjarlais, Jim Favel, and Max J. Morin. Accessed June 9 2017 < [http://publications.gc.ca/collections/collection\\_2016/bcp-pco/Z1-1991-1-41-33-eng.pdf](http://publications.gc.ca/collections/collection_2016/bcp-pco/Z1-1991-1-41-33-eng.pdf)>

*schools, and at times this has been recognized by Canada, this exclusion has caused additional trauma. Because of political critiques, the TRC hastily added a short, poorly researched Volume 3 to its report that considered the Metis experience in general with some attention to the Ile-a-la-Crosse school. In our opinion Volume 3 is a problematic report that does not fit within the current literature of residential schools or Metis history.*

Survivors of the Ile-a-la-Crosse school have continuously noted the extensive similarities between their experiences and survivors who attended recognized schools, particularly the school at Beauval.<sup>50</sup> The schools were both administered by the Oblates, with staff members moving between the schools. One of the key differences seems to be that the Ile-a-la-Crosse school had less money. More recently the Survivors have been impacted by the exclusion of the School from the IRSSA, resulting in feelings that the federal apology in 2008 and national efforts at reconciliation have not included them. Following the exclusion of the Ile-a-la-Crosse school there have been multiple instances where Survivors of the Ile-a-la-Crosse school have been made to share their trauma in the hopes of the School being recognized: Survivors Don Favel and Clem Chartier were on the floor of the House of Commons during Prime Minister Stephen Harper's 2008 apology; election promises to recognize the school in Ile-a-la-Crosse were made and later broken; The TRC had a hearing in Ile-a-la-Crosse in 2012, and in 2016 community members testified in front of the Minister of Indigenous Affairs Carolyn Bennett at a meeting about the excluded school in Ile-a-la-Crosse.

Those who attended unrecognized schools were increasingly excluded from the TRC and the commission's national events. As a result, these excluded groups make little more than a token showing in the TRC reports. Even though Commissioner Littlechild came to Ile-a-la-Crosse to hear stories, over the course of the Commission, the larger national events made increasingly less space for Survivors from unrecognized schools, particularly the Metis.<sup>51</sup> The final event in Ottawa in June 2015 did not include representation from the Metis National Council (MNC), nor was there any acknowledgement of the exclusion of what were considered predominantly Metis Schools from the Settlement Agreement. In a media release by the Metis National Council in response to the final Truth and Reconciliation Commission event President Clément Chartier stated:

I was gravely disappointed in the total absence of any meaningful or corrective recommendations in your report for dealing with the vast majority of the citizens of the Métis Nation who attended Métis specific residential/boarding schools operating under the same assimilationist policies, or cultural genocide as you concluded, and were excluded from the IRSSA and the apology by the Prime

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<sup>50</sup> Statements made at the Ile-a-la-Crosse Public Meeting Regarding the Residential School Claim, March 2015; Ile-a-la-Crosse Residential School Dialogue, Ile-a-la-Crosse, Saskatchewan, 8 September 2016.

<sup>51</sup> Clément Chartier, Open Letter To Truth And Reconciliation Commission Chief Commissioner Murray Sinclair, Posted 12 June 2015. Accessed, 15 June 2015 <  
<http://Desjarlais.metisnation.ca/index.php/news/open-letter-to-truth-and-reconciliation-commission-chief-commissioner-murray-sinclair>>.

Minister.<sup>52</sup>

A few months later, in the fall of 2015 the final report of the TRC included a slim volume about Metis experiences, *Volume Three The Metis Experience*. Chapter four is on Ile-a-la-Crosse with a sole focus on the history of the mission with no mention specifically of the exclusion of the School there.<sup>53</sup> Although the report vaguely acknowledges that Metis students experienced the same policies as other Indigenous students, with the exception of a few pages, the report focuses on what makes these experiences different.<sup>54</sup> The focus on difference serves to undercut the similarities between student experiences at recognized and unrecognized schools, and dismiss "Metis" experiences as not as severe as First Nations experiences. This dismissal is evident by an emphasis on "Metis" involvement in the running of the schools and an equal weight being given to positive and negative experiences. Beyond this, the depiction of being involved in the schools and having positive experiences as unique to the "Metis" experience is problematic. Examples provided of Metis people working in the schools are more extensive than the description of similar experiences of neglect, abuse, unsanitary conditions, heavy workloads etc. Furthermore, the report does not use the same language to describe experiences of negligence and abuse as *Volume One*. The result is the implication that "Metis" students did not have the same harsh experiences as First Nations students, and the fact that this narrative was published by the official Truth and Reconciliation Commission implies that the inaccuracies of *Volume Three* are actually established fact, which is not the case.

The narrative offered in *Volume Three* cannot be substantiated in light of recent academic scholarship as well as narratives from survivors of the Ile-a-la-Crosse school, although academic scholarship and Survivor stories are not readily accessible to all who might read *Volume Three*. Our opinion is that the experiences of Survivors of Ile-a-la-Crosse parallel those of Survivors of other recognized schools. A more detailed discussion of the Survivor experience is included below.

## Student Experience

*The Survivors of the Ile-a-la-Crosse residential school have not had the same opportunities to share their stories or to have their experiences recognized, even though their experiences of being separated from families and cultures, poor living conditions, and abuse are equivalent to those of family, friends, and neighbors who attended the recognized school at Beauval. The School in Ile-a-la-Crosse had a similar purpose related to cultural genocide, was poorly funded with a lack of regulation and oversight from government compared to other schools at the time,*

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<sup>52</sup> Clément Chartier, Open Letter To Truth And Reconciliation Commission Chief Commissioner Murray Sinclair, Posted 12 June 2015. Accessed, 15 June 2015 <<http://Desjarlais.metisnation.ca/index.php/news/open-letter-to-truth-and-reconciliation-commission-chief-commissioner-murray-sinclair>>.

<sup>53</sup> Truth and Reconciliation Commission of Canada, *Canada's Residential Schools. The Métis Experience*.

<sup>54</sup> For places where the report notes similarities between "Metis" and First Nations experience see, Truth and Reconciliation Commission of Canada, *Canada's Residential Schools. The Métis Experience*, pp. 45, 55.

and as a result the Survivors of Ile-a-la-Crosse had the same experiences as those that attended recognized schools. The primary difference between the school in Ile-a-la-Crosse and recognized schools is that it received less funding and more neglect by governments, and Survivors have had to continuously fight for recognition and compensation and have not had the same opportunities to share their stories or for healing.

As has been noted in earlier sections, the fact that the School was run by the same Catholic organization as the school in Beauval, that the same priests and RCMP officers would force families to send their children to the School, and that family allowance payments were used to further coerce attendance suggests that there was no difference between the schools other than location. Upon arrival at the schools, the stories that have been consistently shared by Survivors of the Ile-a-la-Crosse school in public meetings and oral interviews are consistent with the experiences of Survivors of other schools that have been well documented by the TRC and historians. Everything from the traumatic arrival at the School where old clothes were destroyed and new inadequate clothes provided, hair being cut, and siblings being separated, to the common experience of having their cultures and languages demeaned, low quality and inadequate food, high instances of disease, low quality of education with an emphasis on physical labour, and high instances of excessive punishment and sexual abuse is apparent in the stories of the Ile-a-la-Crosse school survivors. The School even has a significant history of fires, like other residential schools.<sup>55</sup>

Buried within the flawed *Volume Three* of the TRC Commission are two paragraphs that outline physical and sexual abuse, entirely based on experiences of students who attended the Ile-a-la-Crosse School. Rather than focusing on these experiences or the significance of the excluded School, the author transitions to discussing more positive experiences, and in fact concludes the chapter on a positive note. The references to negative experiences at Ile-a-la-Crosse provide the reader with a glimpse at survivor narratives.

The paragraph regarding abuse contains quotation after quotation from different survivors with little context. For example, "According to one former Île-à-la-Crosse student, 'Older boys molested younger boys at night in the dormitory and priests and supervisors molested their 'favorite boys.'" <sup>56</sup> Metis National Council President Clement Chartier is quoted as explaining, "Many, many of us suffered physical and sexual abuse."<sup>57</sup> Mike Durocher is described as someone who was abused at the School and it is noted, "he was expelled at age fifteen for putting up posters that identified abusers. The principal called him a liar, and his parents and grandparents refused to believe his story."<sup>58</sup> Finally, part of Robert Derocher's statement before the TRC is included as he explains that "some staff preyed on the students' loneliness: 'It seemed that he knew how to pick the, the children that were hurting and to give them any kind of attention that we were all looking for; even if it was not good.'" These fragments of accounts

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<sup>55</sup> For a more detailed discussion see Fehr, "It was our lives."

<sup>56</sup> Truth and Reconciliation Commission of Canada, *Canada's Residential Schools. The Métis Experience*. p. 50.

<sup>57</sup> Ibid.

<sup>58</sup> Ibid.

are not given sufficient weight, and are buried in the middle of a chapter before moving on to more positive stories. In fact the paragraph following the one about abuse begins with, "There were also positive recollections."<sup>59</sup> Even within this flawed volume, the abuse that students at the Ile-a-la-Crosse received are apparent and are similar to those outlined in *Volume One* and other scholarship on residential schools. We disagree with the tone and arguments of *Volume Three*, and it is our expert opinion that the experiences from survivors that it includes can be better contextualized within the broader history of residential schools to demonstrate the similarities between the experiences of Survivors of Ile-a-la-Crosse and Survivors of other schools.

Over ten years after Stephen Harper made his promises on MBC Radio (Missinipi Broadcasting Corporation) to address the Ile-a-la-Crosse School, the federal Minister of Indigenous Affairs, Dr. Carolyn Bennett, visited Ile-a-la-Crosse and apologized for what happened to students at the School, and for their exclusion from Canada's Reconciliation process. On Thursday September 8<sup>th</sup> 2016 Survivors from across the northwest and beyond gathered under a big top tent in the spot where the residential school had stood. More than the expected 150 survivors and supporters came to share their experiences and hear what the Minister had to say. The event had been planned quickly – with less than a week's notice for people to gather. Some were unable to attend, as there were no funding arrangements for transportation. Although some who attended the School have spent the rest of their lives in Ile-a-la-Crosse or the surrounding communities– others have moved far away. Still others were unable to return to the place filled with negative and traumatic memories.<sup>60</sup> Some of the testimony from that event is summarized below. It is our opinion that these experiences parallel the experiences of Survivors that attended recognized schools.

Archie Daigneault from Buffalo Narrows, began his story in 1947, when he was first forced to attend the School. He was only seven years old. He explained that his family had been camping behind the Church at Ile-a-la-Crosse on their way home from Cree Lake. When they were about to break camp to return to Clear Lake, the Priest came and pointed to him, saying that boy is old enough to go to school. When his parents resisted, the gruff priest threatened to get a RCMP officer. According to Daigneault, that's how he "ended up in the Ile-a-la-Crosse school," a "hard and cruel place" that was more like a prison.<sup>61</sup> His recounting then shifted to describing experiences that paralleled the accounts of survivors who attended recognized schools. Daigneault and many of the other survivors who spoke emphasized the loneliness of being at the School, saying simply, "I cried everyday."<sup>62</sup> When he tried to run back to where his family had been camped, his grandma told him they had already left and he better return to the School. He was severely punished for attempting to run away, and told Minister Bennett and those gathered that he still had the scar from when his face was slammed into a door or a desk

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<sup>59</sup>Ibid.

<sup>60</sup> Amanda Fehr Field Notes; Carolyn Bennett, "Response," Ile-a-la-Crosse Residential School Dialogue, Ile-a-la-Crosse, Saskatchewan, 8 September 2016.

<sup>61</sup> Archie Daigneault, "Open Microphone: Survivor Testimonials," Ile a la Crosse Residential School Dialogue, Ile a la Crosse, Saskatchewan, 8 September 2016.

<sup>62</sup> Ibid.

by the nun. Daigneault said simply, "it hurt so much."<sup>63</sup> Two weeks later a priest beat his cousin with a dog whip. In contrast to the love received at home, in the School the only touch was a slap or a hair pull. In addition to these instances of physical abuse that Mr. Daigneault chose to share with those gathered, he emphasized the poor conditions of the School. Being underfed, not given clean water for washing, and forced to go outside to use the bathroom, even though the School had indoor plumbing.<sup>64</sup> Mr. Daigneault's story could be included in any history of residential schools or collection of Survivor's stories and would not stand out as different. Everything from being forcibly brought to the School, to his effort to escape, to his day to day experience of neglect and violence.

Like other survivors of violence, trauma, and genocide, it can be difficult for Survivors to put their experiences into a narrative by themselves, particularly those that have had few opportunities to share their stories in a safe and trauma informed way. Violet Benjamin of Dillon shared "I stayed there three years, that was enough for me." She shared some fragments about the poor food, the discipline, and the meanness of the staff before saying "that's all I can say, I can't talk anymore."<sup>65</sup> Margaret Aubichon from Patuanak, a plaintiff in this action, also spoke of how difficult it was for her to share her stories. She recalled not wanting to let go of her dad when he first brought her to the school in Ile-a-la-Crosse.<sup>66</sup> At that time she only spoke Dene. She explained "I cannot describe—my mind is blank, because the good things in life you remember, but the things that happened to all of us here today, it was a very cruel and difficult time... Today I do not want to remember how I was treated by other people."<sup>67</sup> The difficulty in having a chance to try and create a narrative of what happened at the School was evident in Antoinette Caisse Lafleur's statement,

Listening to the statements by the other survivors, I said to myself, I am not going to cry. You forget the life, the lost years. When I left school, I buried my memories and feelings from my time there. I rarely spoke about what I went through, and started to rebuild my broken world. Traumatic events, like the School, open old wounds. Anger, resentment, loneliness, shame, and fear, inadequacy, failure. I wanted to tell my stories and failures but didn't find anyone to tell them too. They burned deep in my soul. My sister and I still remember pieces of our experiences, but we did not sit long enough to complete our stories."<sup>68</sup>

Still other Survivors noted the trauma they experienced at the School and its impact on their lives today and their communities. Survivor T.J. Roy provided examples of drug and alcohol abuse and emotional abuse he has witnessed in Ile-a-la-Crosse, and the need to discuss

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<sup>63</sup> Ibid.

<sup>64</sup> Ibid.

<sup>65</sup> Violet Benjamin, "Open Microphone: Survivor Testimonials," Ile a la Crosse Residential School Dialogue, Ile a la Crosse, Saskatchewan, 8 September 2016.

<sup>66</sup> Margaret Aubichon, "Open Microphone: Survivor Testimonials," Ile a la Crosse Residential School Dialogue, Ile a la Crosse, Saskatchewan, 8 September 2016.

<sup>67</sup> Aubichon, "Open Microphone: Survivor Testimonials," 8 September 2016.

<sup>68</sup> Lafleur, "Open Microphone: Survivor Testimonials," 8 September 2016.

healing initiatives that incorporate their proud Metis culture.<sup>69</sup> Other survivors echoed T.J.'s references to dysfunction in the communities relating to what happened at the School, and called for healing and support programs to address the intergenerational effects of the schools.<sup>70</sup> As Margaret Aubichon observed, "today's society is abusive. It's not their fault, you can't wash away the abuse they received."<sup>71</sup> Marie-Ange Greyeyes shared how reading books about the history of residential schools helped her to make sense of her own experiences at the school in Ile-a-la-Crosse, where she stayed for nine years, and the subsequent impact it had on her life. She described losing her identity explaining, "I did not know who I was, they told me how to think, how to pray."<sup>72</sup> The cost of losing her identity was alcoholism. She shared:

I didn't have my own honest true identity until I was grown-up. I read books, taught myself books, read history books about the beginning of the boarding schools. It was not just the Roman Catholic Church – other churches, and the federal government gave money to start the schools. They had an agreement. One thing they had to do was take the Indian out of child. Then I understood why I was treated the way I was. I was a good little Indian, but a very angry white girl.<sup>73</sup>

Survivors have often noted how the national narrative of residential schools has helped them to make sense of their own experience. We have observed community members that once described their schooling experience as normal later reflect on the violence and neglect - or come to realize that what they experienced as "normal" was in fact the common experience of the Indian Residential School System in Canada.

Several other speakers noted experiences at the residential school in Ile-a-la-Crosse that are similar to those of survivors documented in *Volume One* of the TRC, including loneliness, loss of language, loss of identity, inadequate food, separation from family, absence of love, being identified by a number, inappropriate clothing for the weather, being forced to pray, being forced to work, negligence, and various abuse.<sup>74</sup> The distance and difference between life in the bush with parents or grandparents and life at the School was noted. Happy memories of hunting and suppers of rabbit and duck were contrasted with starving in the School.<sup>75</sup> As Lawrence Morin explained, we spent "half the time starving" in the School.<sup>76</sup> Many mentioned the number they

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<sup>69</sup> TJ Roy, "Open Microphone: Survivor Testimonials," Ile a la Crosse Residential School Dialogue, Ile a la Crosse, Saskatchewan, 8 September 2016.

<sup>70</sup> M. Cote, "Open Microphone: Survivor Testimonials," 8 September 2016; Glen McCallum, "Open Microphone: Survivor Testimonials," Ile a la Crosse Residential School Dialogue, Ile a la Crosse, Saskatchewan, 8 September 2016.

<sup>71</sup> Margaret Aubichon, "Open Microphone: Survivor Testimonials," September 8<sup>th</sup> 2016.

<sup>72</sup> Greyeyes, "Open Microphone: Survivor Testimonials," 8 September 2016.

<sup>73</sup> Ibid.

<sup>74</sup> Lawrence Morin, "Open Microphone: Survivor Testimonials," 8 September 2016; Jules Daigneault, "Open Microphone: Survivor Testimonials," 8 September 2016; Abraham Gardiner, "Open Microphone: Survivor Testimonials," 8 September 2016.

<sup>75</sup> Abraham Gardiner, "Open Microphone: Survivor Testimonials," 8 September 2016.

<sup>76</sup> Lawrence Morin, "Open Microphone: Survivor Testimonials," 8 September 2016.

were given at the School. Lawrence Morin explained, "Me and Clem were in boarding school together, my number was 42, his 46."<sup>77</sup>

Among the primary arguments for recognition by Survivors at the 2016 meeting with Minister Bennett was the clear similarity between what happened to students at Ile-a-la-Crosse and in the recognized Indian Residential School at Beauval. As Jim Durocher pointed out several times, the only difference between these schools was a distance of thirty miles.<sup>78</sup> For many who attended the school in Ile-a-la-Crosse, speaking before Minister Bennett was the first time they had an opportunity to share their stories and hope they might be believed. Beyond this, coming together as a community to listen to each other, and affirm the truth of what fellow Survivors were saying, was emotional. The time Survivors of the Ile-a-la-Crosse spent waiting for the chance to share their stories was observed by several speakers, as was the fact that many of their fellow Survivors passed away waiting for this day to happen. At the time, Minister Bennett expressed regret for Survivors' traumatic experiences, but stopped short of admitting any wrongdoing on the part of the federal government: "We are deeply sorry for the pain and suffering you have endured."<sup>79</sup> Nearly ten years after the event, Survivors are still waiting for recognition of their experiences.

It is our opinion that the student experiences of the Survivors that attended the Ile-a-la-Crosse parallels that of Survivors of recognized schools. The above examples have additionally illustrated the ongoing harms and damages that the experience has caused survivors, their families, and their communities. The examples provided are only some of many that were shared with Minister Bennett in 2016. Additional examples can be found in the recording of the one TRC event that was held in Ile-a-la-Crosse, as well as other community meetings about the School. Survivors of Ile-a-la-Crosse have not had the same opportunities to share their stories in a trauma-informed way as Survivors of other schools.

## Conclusion

This report has outlined the historical contexts and administrative history of the Ile-a-la-Crosse school to explain how the federal and provincial governments accepted responsibility for the Ile-a-la-Crosse school at various points throughout its history through funding (direct and indirect) as well as policy. Nevertheless, they did not fulfill their responsibilities, as evidenced by consistent histories of underfunding and neglect as a result of both Federal and Provincial governments seeing the School as falling under the other's jurisdiction, and their willful inattention and neglect. The consequence for students was a school experience that mirrored the experiences of students throughout the residential school system in Canada.

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<sup>77</sup> Ibid.

<sup>78</sup> Jim Durocher, Ile-a-la-Crosse Residential School Dialogue, Ile-a-la-Crosse, Saskatchewan, 8 September 2016.

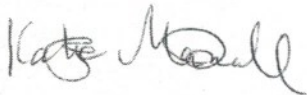
<sup>79</sup> Bryan Eneas, "Minister Carolyn Bennett Addresses Boarding School Survivors," *PA Now*, September 8, 2016, <https://panow.com/2016/09/08/minister-carolyn-bennett-addresses-boarding-school-survivors-2/>

**Submitted by Amanda Fehr and Katya MacDonald**

Amanda Fehr  
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Signature:

A handwritten signature in cursive script, appearing to read "Amanda Fehr".

Katya MacDonald  
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A handwritten signature in cursive script, appearing to read "Katya MacDonald".

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## Schedule 2: Timeline of Key Events Relating to the Ile-a-la-Crosse School

- 1776: founding of Ile-a-la-Crosse community
- 1846 founding of Oblate mission
- 1860: Ile-a-la-Crosse school opens
- 1876: Indian Act comes into effect
- 1880: Prime Minister Sir John A. Macdonald describes Ile-a-la-Crosse school as a role model for other Indian residential schools
- 1897: federal government officially begins providing funding to Ile-a-la-Crosse school
- 1905: Saskatchewan becomes a province
- 1906: Treaty 10 and scrip commissions in northwestern Saskatchewan
- 1906: school relocates to La Plonge due to flooding; becomes Beauval residential school
- By 1917: separate school distinct from Beauval has reopened in Ile-a-la-Crosse
- 1928: school requests and is awarded a grant to cover the cost of 1 teacher salary
- 1941: province begins providing limited educational grants for Metis children
- 1944: Election of provincial CCF government
- 1945: federal family allowance payments begin
- 1948: CCF begins collecting income tax (insufficient to fund education)
- 1960s: beginning of influx of more permanent settlement in Ile-a-la-Crosse
- 1961: province makes special arrangements with the School to subsidize its operations (not based on provincially-assessed need, but on mission petitions)
- 1972: creation of the Department of Northern Saskatchewan
- 1973: local takeover of the School and construction of new school building due to fire
- 1974: mission starts a temporary mission run school in resistance to new secular school under local control
- 1976: Ile-a-la-Crosse school residence closes
- 2007: implementation of the Indian Residential School Settlement Agreement
- 2008: Prime Minister Stephen Harper apologizes to residential school survivors; Ile-a-la-Crosse survivors invited to be present on floor of parliament for the apology
- 2012: Truth and Reconciliation Commission hearing in Ile-a-la-Crosse
- 2015: final TRC events exclude Metis National Council and do not mention exclusion of primarily Metis schools from the settlement agreement
- 2015 November: final TRC Report includes *Volume Three* on the Metis experience
- 2016: federal Minister of Indigenous Affairs visits Ile-a-la-Crosse and apologizes for pain and suffering of survivors

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## PROFESSIONAL PROFILE

I am a researcher, educator and facilitator with 16+ years of experience in community engaged research. My approach to community engagement, research, and teaching is based on building sustainable relationships with communities and individuals.

## SKILLS & COMPETENCIES

- Proven Experience Working with Diverse Communities
- Partnership Building
- Strong Interpersonal Skills and Ability to Work and Lead in a Team Setting
- Self-motivated and Highly Organized
- Proven Track Record of Successful Grant and Funding Applications
- Experienced Public Speaker & Facilitator
- Strong Written Communication Skills
- Research and Data Analysis
- Course and Workshop Design
- Event Planning and Coordination
- Proven Experience Mentoring & Training
- Understanding of Research Ethics & Confidentiality
- Media Training and Interview
- Antiracism Network Training (3 Modules, 30 hours)
- Certified in First Aid and Mental Health First Aid for First Nations

## EDUCATION

**PhD, History, University of Saskatchewan, 2018**

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Field Specializations: Comparative Aboriginal History; Post-Confederation Canadian History; and American History 1865-Present.

Dissertation Title: *"It was our Lives, That was what We Believed": Indigenous Histories of Catholicism in Northwest Saskatchewan* (<https://ecommons.usask.ca/handle/10388/8332>)

**Master of Arts, History, University of Saskatchewan, 2009**

Supervisor: Keith Carlson

Thesis Title: *The Relationships of Place: a Study of Change and Continuity in Stó:lō Understandings of I:yem* (<https://ecommons.usask.ca/handle/10388/etd-09262008-134019>)

**B.A., High Honours in History, University of Saskatchewan, 2006.**

This is Exhibit "B" referred to in the affidavit of Ms. AMANDA FEHR sworn before me at Saskatoon this 28 day off February 2024.

Notary public for Saskatchewan

Appointment expiration date: 21 March 2028

Public Engagement Advisor, Communications and Public Engagement Department, City of Saskatoon, September 2022- present.

Public Engagement Consultant II, Communications and Public Engagement Department, City of Saskatoon, May 2019-September 2022.

Communications Officer, Saskatoon Inter-Agency Response to COVID-19, May -December 2020.

Project Coordinator, Living in Saskatchewan Youth Storytelling Project, Saskatchewan History & Folklore Society, Spring 2018- 2019.

Course Co-Developer, STM College, University of Saskatchewan, Spring 2018-2019.

Course Developer and Instructor: 42 CU University Level Courses (Various) University of Saskatchewan, 2011-2019.

Academic Researcher and PhD Candidate, University of Saskatchewan, 2008-2017.

Facilitator, Community Engagement Projects, Office of Community Engagement, Station 20 West University of Saskatchewan, 2015-2017.

Project Coordinator, Youth Storytelling Projects (various), City of Saskatoon and Saskatoon Open Door Society, 2015-2016.

Supervisor, The Community Engaged Collaboratorium, Department of History, University of Saskatchewan, Spring 2015.

Field Instructor, University of Saskatchewan/ Simon Fraser University Tla'amin (Sliammon) Ethnohistory/Archaeology Field School, June 2012.

Research Assistant Positions (various), University of Saskatchewan and University of Alberta, 2006-2013.

## SERVICE

Fiduciary Board Member, Saskatchewan History and Folklore Society, 2012-2018; 2020-present.

Planning Committee Member, Prairie Prism, Saskatoon, 2016-present.

Committee Member, Borderless, planning public events about Refugee experiences in Saskatoon, Fall 2017 – Spring 2019.

Book Review Editor, *The Engaged Scholar Journal*, University of Saskatchewan, 2017- 2019.

Committee Member, Equity and Anti-Racism Committee, Saskatchewan Intercultural Association, 2016-2018.

Committee Member, Friends of the Karen Community, Supporting local Karen summer language camp. Summer 2017.

“Advocacy Workshop with Alaa Murabit,” Station 20 West, May 7<sup>th</sup> 2016. Event co-coordinator.

Advisory Member, Ile-a-la-Crosse cultural committee, Fall 2014-2015.

Volunteered at community events as part of community engaged research, Ile-a-la-Crosse, Chilliwack, Washington State, Patuanak, 2006-2016.

## PUBLICATIONS

“A Subversive Sincerity: Christian Gatherings and Political Opportunities in S’olh Téméxw,”  
in *Mixed Blessings*, Edited by Tolly Bradford and Chelsea Horton, UBC Press, 2016.

“Relationships: A Study of Memory, Change, and Identity at a Place Called I:yem,” *University of the Fraser Valley Research Review*, Online Journal (April 2009). Updated and Re-submitted as part of a collection on Stó:lō Ethnohistory, published with the University of Manitoba Press, 2018.

With MacKinley Darlington, “Encountering Mary: Apparitions, Roadside Shrines, and the Métis of the Westside,” *Saskatchewan History*. 61(2), Fall 2009.

### Book Review

Review of *Contact Zones: Aboriginal and Settler Women in Canada's Colonial Past*, Edited by Katie Pickles and Myra Rutherdale in *Saskatchewan History* (Spring 2007).

### Edited Collections

*In Good Relation: History, Gender and Kinship n Indigenous Feminisms*, Sarah Nickel and Amanda Fehr, eds. (Winnipeg: University of Manitoba Press, 2020)

## FUNDING

2015 Department of History, University of Saskatchewan, Senior Teaching Fellowship, \$18,000.

2013 Province of Saskatchewan, Queen Elizabeth II Fellowship in Parliamentary Studies, \$20,000.

2013 Department of History, University of Saskatchewan, Senior Teaching Fellowship, \$16,900 (declined).

2012 University of Saskatchewan, Teacher Scholar Doctoral Fellowship, \$18,000.

2012 Provincial Government and University of Saskatchewan, Saskatchewan Innovation and Opportunity Scholarship, \$10,000.

2011 University of Saskatchewan Graduate Scholarship (Doctoral level), \$18,000.

2011 Michael Smith SSHRC Foreign Study Supplement, \$6,000.

2008 SSHRC Joseph-Armand Bombardier CGS Doctoral Level (3 years @ \$35,000 /year).

2008 University of Saskatchewan Deans PhD Scholarship \$80,000 over 4 years (declined).

2007 University of Saskatchewan Master's Graduate Scholarship \$15,000.

2006 SSHRC Canada Graduate Scholarship at the Masters Level \$17,500.

### CONFERENCE PRESENTATIONS

"Remembering Willow Heart: Negotiating Catholicism and Indigeneity in Treaty Ten," *Canadian Society of Church History Annual Meeting*, University of Regina, 31 May 2018.

"My mom tends to tell it the Catholic way. I'd tell it my way, the right way.": Local histories of the 1885 Resistance." *Annual Meeting of the Canadian Catholic History Association*, University of Calgary, June 2nd 2016. Also presented at *NAISA Annual Meeting*, Vancouver BC, 22 June 2017.

"I am a Strong Woman": Reconciling Narratives of Christianity, Gender, and Political Activism in Recent Aboriginal Histories." *NAISA Annual Meeting*, Washington D.C., June 6<sup>th</sup> 2015; also presented at *Canadian Historical Association Annual Meeting*, University of Ottawa, June 1<sup>st</sup> 2015.

"Taking Students to the River: Negotiating Community and Academic ways of Teaching and Learning." *American Society for Ethnohistory*, New Orleans Louisiana, 11-14 September 2013.

Conflicted Conflict: Christianity and the Métis in Northwestern Saskatchewan, *Canadian Historical Association Annual Meeting*, Wilfrid Laurier University and the University of Waterloo, 28-30 May 2012; Also presented as the invited after dinner talk at the *Saskatchewan History and Folklore Annual Conference*, 1 June 2012.

"A Nation Transformed?: Continuity and Change in Stó:lô Understandings of their Spiritual Places," *NAISA Annual Meeting*, Tucson Arizona, 20-22 May 2010.

"Relationships: A Study of Memory, Change, and Identity at a Place Called I:yem" *American Society for Ethnohistory*, New Orleans Louisiana, 31 September-4 October 2009.

"Claiming I:yem: The Sto:lo, The Yale, and the Mobilization of Authority in the Fraser Canyon," *Canadian Historical Association Annual Meeting*, Carleton University, 26 May 2009.

"Memory Borders: A Study of Fishing, Commemoration, and Change amongst the Sto:lo Coast Salish" at the *Organization of American Historians* meeting, Seattle Washington, 26-28 March 2009.

"The Relationships of Place: A Study of Memory, Change, and Identity in Aboriginal British Columbia" at the *Western Canadian Studies Conference*, University of Alberta, 19 – 22 June 2008.

With Liam Haggarty, "From Student Scholar to Trained Historian: Community-based History and the Question of Authority," *American Society for Ethnohistory*, Ottawa Ontario, 13 – 17 October 2010. Session organizer with Liam Haggarty.

With Katya MacDonald, "The Red River Jig in Sakitawak: Making Métis Music and Identities in Northwestern Saskatchewan," *NAISA Annual Meeting*, Sacramento California, 19 May 2011

This is Exhibit "C" referred to in the  
affidavit of Ms. KATYA MACDONALD  
sworn before me at Saskatoon  
this 28 day of February, 2024.

[Signature]  
Notary public for Saskatchewan  
Appointment expires on: 21 March 2028

KATYA MACDONALD  
305 31<sup>ST</sup> ST W  
SASKATOON, SK  
S7L 0P8  
(306) 281-0876  
katyacmacdonald@gmail.com

## CURRICULUM VITAE

### EDUCATION

2007

**B.A. (High Honours in History and English, with Language Recognition in German)**

University of Saskatchewan

2010

**M.A. (History)**

University of Saskatchewan

Thesis: "Looking for Snob Hill and Sq'ewqel: Exploring the Changing Histories of Aboriginality and Community in Two Aboriginal Communities"

2017

**PhD (History)**

University of Saskatchewan

Comprehensive reading fields in Comparative Aboriginal History (major field), Canadian History (minor field), and African History (minor field) completed October 2011

Dissertation Title: "Making Histories and Narrating Things: Histories of Handmade Objects in Two Indigenous Communities"

### FUNDING AND AWARDS

2003-2007: Dean's Honour List, College of Arts & Science, University of Saskatchewan

2003, 2004: German Book Prize, Department of Languages and Linguistics, University of Saskatchewan: \$100

2004: Smyth Scholarship, College of Arts & Science, University of Saskatchewan: \$2,000

2005: Hannon Scholarship, Department of English, University of Saskatchewan: \$5,000

2006: Kathleen R. McKenzie Scholarship, Department of History, University of Saskatchewan: \$4,000

2007-2008: SSHRC Canada Graduate Scholarship (Master's): \$17,500

2008: University of Saskatchewan Department of History Travel Award

2008-2009: University of Saskatchewan Graduate Research Fellowship: \$15,000

2010: University of Saskatchewan Dean's Fellowship (declined in order to accept SSHRC award): \$60,000

2010-2013: SSHRC Joseph-Armand Bombardier Canada Graduate Scholarship Doctoral Scholarship: \$105,000

2012: University of Saskatchewan Department of History Travel Award: \$1,008.21

2012: University of Saskatchewan Office of the President conference funding: \$1000

2013: Saskatchewan Innovation Scholarship: \$10,000

2013-2014: University of Saskatchewan Senior Teaching Fellowship: \$17,000

2014: Tool and Trade History Society Salaman Award: £500 GBP (approximately \$900 CAD)

2014: University of Saskatchewan Department of History Travel Award: \$1,413.44

2014-2015: University of Saskatchewan Teacher-Scholar Doctoral Fellowship: \$20,000

2015-2016: University of Saskatchewan Senior Teaching Fellowship: \$18,000

2016-2017: University of Saskatchewan Graduate Service Fellowship: \$16,000

#### INSTRUCTIONAL EXPERIENCE

2004-2005

##### **Oral Tutorial Leader (German)**

Department of Languages and Linguistics

University of Saskatchewan

2012

##### **Field Instructor: History 460.6/860.6 (University of Saskatchewan-Simon Fraser University-Tla'amin First Nation ethnohistory/archaeology field school)**

Mentored senior undergraduate and MA students in community-engaged historical research projects in partnership with the Tla'amin First Nation

2013

**Seminar Leader: Native Studies 107.3 (Introduction to Native Studies)**

Department of Indigenous Studies, University of Saskatchewan

2013

**Instructor: History 151.3 (Canadian History to 1867)**

Department of History, University of Saskatchewan

2014

**Summer Student Coordinator**

Supervised community-engaged undergraduate summer research, Interdisciplinary Centre for Culture and Creativity, University of Saskatchewan

2015 and 2016

**Instructor: History 125.3 (Indigenous Histories of Canada)**

Department of History, University of Saskatchewan

CONFERENCE PRESENTATIONS

2006

“Knowledge in Relationships on the Northwest Coast,” Michael Swan Honours Colloquium, University of Saskatchewan

2006

“University of Saskatchewan Student Atlas Research: Methods, Approaches and Findings to Date,” First Annual Louis Morin Research Symposium, University of Alberta (co-presenter)

2007

“From Snob Hill to Bouvierville: Naming Places in Île-à-la-Crosse, Saskatchewan,” Buffalo Province History Conference, University of Saskatchewan and Canadian Indigenous and Native Studies Association Conference, University of Saskatchewan

2008

“Time in Space: The Intersection of Histories in Aboriginal Communities,” Fort Garry Lectures in History, University of Manitoba

2008

“Knowing and Navigating Paths of Access to Stó:lō Fishing Sites in the Twentieth Century,” Buffalo Province History Conference, University of Saskatchewan

2008

“Crossing Paths: Accessing Stó:lō Fishing Sites in the Twentieth Century,” Western Canadian Studies Conference, University of Alberta

2009

“Community and Aboriginality in Two Aboriginal Communities,” Keewatin Country History Conference, University of Saskatchewan

2010

“Changing Expectations: Local Histories and Meanings of Indigeneity in Stó:lō and Métis Communities,” Engaging and Articulating “Race” Graduate Student Symposium, University of Victoria

2011

“The Red River Jig in Sakitawak: Making Métis Music and Identities in Northwestern Saskatchewan,” Native American and Indigenous Studies Association, University of California Davis (co-presenter)

2012

“Creating Community through Conflicted Histories: Negotiating Stó:lō Places,” Canadian Historical Association Annual Meeting, Wilfrid Laurier University/University of Waterloo

2012

“Making Histories, Meanings, and Moosehide Jackets,” Directions West Conference, University of Calgary

2012

“Making Histories and Narrating Things: A Social History of Material Culture in Canadian Aboriginal Communities,” American Society for Ethnohistory Annual Meeting, Missouri State University

2013

“Making Histories and Narrating Things: Exploring Tangible Complexities in Aboriginal Histories,” Canadian Historical Association Annual Meeting, University of Victoria (poster presentation)

2013

“Student, Instructor, Newcomer, Expert: Negotiating Overlapping Fields in the Field,” American Society for Ethnohistory Annual Meeting, University of Mississippi

2015

“A Spindle, an Awl, and the Construction Tools of Tla’amin Histories in the Twentieth Century,” Canadian Historical Association, University of Ottawa, and Native American and Indigenous Studies Association, Washington, D.C.

2016

“Emotional Labour, Gender, and Community-Engaged Historical Research,” Canadian Historical Association, University of Calgary (poster presentation)

2018

“Community Authority and Scholarly Intention: Historical Knowledge in Traditional Use Study (TUS) Interviews,” Canadian Historical Association, University of Regina

2023

“Developing Regional Professional Development Networks,” CARA West Conference (Canadian Association of Research Administrators)

#### PEER-REVIEWED PUBLICATIONS

“Crossing Paths: Knowing and Navigating Paths of Access to Stó:lō Fishing Sites,” *University of the Fraser Valley Research Review* 2:2 (2009), <http://journals.ufv.ca/tr/RR22/article-PDFs/3-macdonald.pdf>, updated and reprinted in *The New Ethnohistory*, ed. Keith Carlson and John Lutz, University of Manitoba Press, 2018

“Community and Aboriginality in an Aboriginal Community: Relating to Histories in and of Île-à-la-Crosse,” *Saskatchewan History* 61:2 (2009)

“A Spindle, an Awl, and the Construction Tools of Tla’amin Histories in the Twentieth Century,” *NAIS Journal* 7:1 (2020)

#### NON PEER-REVIEWED PUBLICATIONS

“Plains Injustice: Tipi Camps and Settler Responses to Indigenous Presence on the Prairies” (3-part blog series), *Active History* (2018), <https://activehistory.ca/blog/2018/09/28/plains-injustice-tipi-camps-and-settler-responses-to-indigenous-presence-on-the-prairies-part-1/>

“Transforming your Conference Presentation into a Journal Article,” *Partnership* 16:2 (2021)

#### BOOK REVIEWS

Review of *Clearing the Plains: Disease, Politics of Starvation, and Loss of Aboriginal Life* by James Daschuk, *Social History/Histoire sociale* 47:93 (2014)

#### INVITED PUBLIC PRESENTATIONS

2010

“Saskatoon and the Marr Residence during the Northwest Resistance of 1885”  
Marr Residence, Saskatoon

2012

“The Nutana Community and the Moose Woods Reserve, 1881-1900”  
Marr Residence, Saskatoon

2013

“Life at University”  
Rossignol High School, Ile-a-la-Crosse, SK

2013

“Treaty-making on the Prairies”  
W.P. Bate Elementary School, Saskatoon, SK and International Women of Saskatoon

2015

“How Do Historians Study the Past, and Why Does it Matter?”  
Rossignol High School, Ile-a-la-Crosse, SK

INVITED GUEST LECTURES AND TEACHING

2011

“Preparing to Write Your MA Thesis”  
Department of History, University of Saskatchewan

2012

“Access to History”  
Keewatin Graduate Conference Roundtable, University of Saskatchewan

2012

“Introduction to Oral History Research”  
University of Saskatchewan

2013, 2014, 2016

“Indigenous Spaces and Histories”  
INCC 310: Cultural Heritage Mapping

2019

“Turning your Conference Presentation into a Journal Article”  
Keynote address, Thompson Rivers University

2023

“Turning your Conference Presentation into a Journal Article”  
University of Southern Queensland, School of Law and Justice Research Conversation Series

SELECTED PROFESSIONAL DEVELOPMENT ACTIVITIES

2016

Co-organizer: Post-Graduate Placement Strategies Symposium

2014-2015

Gwenna Moss Centre course, University of Saskatchewan: GSR 982 Mentored Teaching

2020

Canadian Association of Research Administrators Equity, Diversity, and Inclusion Series certificate

2021-present

Founder and co-organizer, Saskatchewan Research Facilitation Network

2022-present

(In progress) Certificate in Knowledge Mobilization, Guelph University

2023

Tri-Agency Implicit Bias training

RELATED EMPLOYMENT:

2006

**Research Assistant: Métis Historical Atlas Project**  
Department of History/Diefenbaker Canada Centre  
University of Saskatchewan

2007-2008

**Research Assistant**  
Department of History  
University of Saskatchewan

2008-2009

**Project Coordinator: *Otipimsuak* Métis Historical Atlas project (Community-University Research Alliance: University of Saskatchewan/University of Alberta/Northwest Métis Council)**

Managed author submissions, compiled database of potential peer reviewers, liaised with project PIs and cartographers regarding authors' pre-publication design and mapping requirements, communicated with publishers

2010

**Researcher: Marr Residence (City of Saskatoon)**  
Created research report and public exhibit on Saskatoon's involvement in the 1885 Resistance

2010

**Indexer**  
For: *Orality and Literacy: Reflections Across Disciplines*, ed. Keith Thor Carlson, Kristina Fagan, and Natalia Khanenko-Friesen (Toronto: University of Toronto Press, 2010)  
and Keith Thor Carlson, *The Power of Place, the Problem of Time: Aboriginal Identity and Historical Consciousness in the Cauldron of Colonialism* (Toronto: University of Toronto Press, 2010)

2010-2011

**Researcher: Metis Historical Atlas project**  
Undertook community-engaged oral history research on Metis and First Nations music in twentieth-century northwestern Saskatchewan

2012

**Researcher: Marr Residence (City of Saskatoon)**  
Created public exhibit and educational materials on early relations between Saskatoon and neighbouring First Nations communities

2013-2015

**Lead Researcher, Trapline Claims Project (Treaty 8 Tribal Association)**  
Managed large-scale historical and legal research project, supervising four research assistants

2016-2017

**Graduate Editor-in-Chief, University of Saskatchewan Undergraduate Research Journal**

Oversaw the publication of a peer-reviewed journal, and supervised a team of approximately twenty undergraduate editors

March-November 2017

**Research Analyst, Whitecap Dakota First Nation (contract position)**

Provided research and administrative support to the First Nation's self-government negotiations

2017

**Expert researcher, Metis rights & history**

Conducted archival, secondary source, and case law research to prepare a report analysing the Aboriginal rights of the defendant; engaged by the defendant's legal counsel as an expert in the field of Métis history

November 2017-2021

**Research Facilitator, University of Saskatchewan Library**

Liaised with faculty librarians and other research partners to expand library capacity in grant development, research output, and knowledge mobilization

2018-2021

**Project Administrator, University of Regina/Métis Addictions Council of Saskatchewan, Inc. (MACSI)**

Facilitated relationships among researchers, community partners, and Elders; directed project timelines and facilitated workshops and meetings

2021-present

**Applied Research Facilitator, Saskatchewan Polytechnic**

Develop grant applications and applied research partnerships with community and industry; build research capacity across the institution

COMMUNITY INVOLVEMENT

2002-2023

Member, Saskatoon Philharmonic Orchestra

2007-2011

Instructor, Heart of the City Piano Program

2012-present

Member, Saskatoon Fiddle Orchestra

2021-present

Volunteer, Riversdale Community Fridge

2023-present

Member, University of Saskatchewan Community-University String Orchestra

2023-present

Director, Saskatchewan Orchestral Association Board of Directors