

**ABBREVIATED NOTICE TO MEMBERS REGARDING A CLASS ACTION LAWSUIT
ABOUT ISOLATION OR CONFINEMENT MEASURES AND SEXUAL ABUSE IN
CENTRES COMMITTED AGAINST MINOR PERSONS PLACED UNDER A YOUTH
OFFENDERS ACT**

500-06-001269-238

TAKE NOTICE that on September 19, 2025, the Superior Court of Québec authorized a class action against the following defendants: the Government of Québec (represented by the Attorney General of Québec) and Santé Québec, acting through sixteen (16) integrated (university) health and social services centres (also known as IUHSSC, IHSSC, CIUSSS or CISSS). The class includes the following persons:

Any person, save for an excluded person, who was placed in a Centre under the Young Offenders Act while aged 17 or under and who was subjected to Measures or sexual abuses on or after October 1, 1950.

The capitalized words have the following meanings:

- a) **“Centre”**: means an industrial school, a youth protection school, a charitable institution, a reception centre, a secured unit, a detention centre, a transition centre, a child and youth protection centre, a rehabilitation centre, a rehabilitation centre for young persons with adjustment problems, an intensive supervision unit, and a youth centre.

It excludes an hospital centre, a group home or a foster family.

- b) **“Young Offenders Law”**: means the *Juvenile Delinquents Act*, the *Young Offenders Act* and the *Youth Criminal Justice Act*.

It excludes the *Youth Protection Schools Act* and the *Youth Protection Act*.

- c) **“Measures”**: means:

- i) being confined in an isolation cell or in a common area, being confined in one’s room or in a cell, being placed in an intensive supervision unit, being subjected to “stop action” or to a withdrawal period (“timeout”), for disciplinary or administrative purposes;
- ii) any use of force by any mechanical or physical means;
- iii) any use of force involving any chemical substance or medical intervention;
or
- iv) strip searches with or without touching.

- d) **“Excluded person”**: means:

- i) Any person included in the class definition in the matter *Dandy v. Attorney General of Quebec et al* (500-06-001265-236);

- ii) Any person who is a member of the class on whose behalf a class action was authorized in connection with Mont d'Youville reception centre (200-06-000221-187), except if that person was also admitted to a reception centres other than Mont d'Youville;
- iii) Any person who received financial assistance and signed a release pursuant to the National Program of Reconciliation with the Duplessis Orphans or the National Reconciliation Program for Duplessis Orphans Who Were Residents of Certain Institutions (collectively, the "NPRDO"). This exclusion does not apply to any such persons if, beyond having been admitted to one of the institutions covered by the NPRDO between October 1, 1950, and December 31, 1964, (i) they were also admitted during this period to reception centres which are not covered by the NPRDO; or (ii) they were also admitted or readmitted, on or after January 1, 1965, to any reception centre.

This class action will be brought in the judicial district of Montréal. A.D. has been appointed as the representative plaintiff for the class action.

The representative plaintiff, A.D., claims that the Government of Québec and Santé Québec, acting through the sixteen (16) defendant establishments, are liable for imposing Measures as well as for the sexual abuse suffered by children who were placed in a Centre. In particular, A.D. seeks to prove that children were, and continue to be, confined in isolation cells, common areas, rooms or cells, placed in intensive supervision units, subjected to "stop acting" or "timeout" periods for disciplinary or administrative purposes, exposed to the use of force and strip searches, and sexually assaulted.

The Superior Court will decide at a trial in the future whether the defendants were at fault. It will also decide whether class members are entitled to compensation.

The allegations of the representative plaintiff and any class member, as well as the alleged liability of the defendants, remain to be proven.

You are not required to do anything in order to become a member of this class action. You are automatically included if you fall within the definition of the class.

Any member of the class who has started an individual lawsuit based on the same facts as the present class action is deemed to opt out of this class action unless they discontinue their lawsuit prior to the opt-out deadline of.

If you **do not want** to be included in this class action and obtain payment if the class action is granted or settled, you may opt out by notifying the clerk of the Superior Court of Québec in the judicial district of Montreal, ideally by registered or certified mail, prior to February 16, 2026, at 4:30 p.m., at the following address: Greffe civil de la Cour supérieure, Palais de justice de Montréal, 1 Notre-Dame Street East, Montréal (Québec) H2Y 1B6. Any class member who has not opted out of the class action by the above-mentioned date will be bound by any judgment rendered in this class action.

This is an abbreviated notice. A more detailed notice is available in the Registry of class actions at the following address:

<https://www.registredesactionscollectives.quebec/fr/Consulter/ApercuDemande?NoDossier=500-06-001269-238>

For more information concerning this class action, you can contact counsel for the class by the following means:

E-mail: adca@alexeevco.com

Phone: 514 545-7080

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Counsel for the representative plaintiff and the class members are:

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PUBLICATION OF THIS NOTICE HAS BEEN ORDERED BY THE COURT.

Nº : 500-06-001269-238

S U P E R I O R C O U R T

(Class Action Division)

DISTRICT OF MONTRÉAL

A.D.

Plaintiff

C.

PROCUREUR GÉNÉRAL DU QUÉBEC

et

**CENTRE INTÉGRÉ DE SANTÉ ET DE SERVICES SOCIAUX
DU BAS - SAINT- LAURENT et al.**

Defendants

**NOTICE TO MEMBERS ABOUT A CLASS
ACTION LAWSUIT**

ORIGINAL



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