

**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

This notice concerns the class action authorized by the Superior Court of Québec on September 19, 2025, against the following defendants: the Government of Québec (represented by the Attorney General of Québec) and Santé Québec, acting through six (6) integrated university health and social services centres (also known as IUHSSC or CIUSSS)¹ and ten (10) integrated health and social services centres (also known as IHSSC or CISSS)². 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

¹ The Centre intégré universitaire de santé et de services sociaux du Saguenay – Lac-Saint-Jean, the Centre intégré universitaire de santé et de services sociaux de la Capitale-Nationale, the Centre intégré universitaire de santé et de services sociaux de la Mauricie-et-du-Centre-du-Québec, the Centre intégré universitaire de santé et de services sociaux de l’Estrie – Centre hospitalier universitaire de Sherbrooke, the Centre intégré universitaire de santé et de services sociaux de l’Ouest-de-l’Île-de-Montréal, and the Centre intégré universitaire de santé et de services sociaux du Centre-Sud-de-l’Île-de-Montréal.

² The Centre intégré de santé et de services sociaux du Bas-Saint-Laurent, the Centre intégré de santé et de services sociaux de l’Abitibi-Témiscamingue, the Centre intégré de santé et de services sociaux de la Côte-Nord, the Centre intégré de santé et de services sociaux de la Gaspésie, the Centre intégré de santé et de services sociaux de Chaudière-Appalaches, the Centre intégré de santé et de services sociaux de Laval, the Centre intégré de santé et de services sociaux de Lanaudière, the Centre intégré de santé et de services sociaux des Laurentides, the Centre intégré de santé et de services sociaux de la Montérégie-Est, and the Centre intégré de santé et de services sociaux de l’Outaouais.

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

WHO IS A CLASS MEMBER?

You are a class member if you meet the following criteria:

- You were placed in a Centre on or after October 1, 1950, while you were 17 years old or younger;
 - In this context, a Centre includes, 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, a youth centre. It excludes a hospital centre, a group home or a foster family. If you have any doubt as to whether the institution in which you were placed is a Centre, you may contact counsel for the class by the means indicated below.

and

- Your placement in a Centre occurred pursuant to a Young Offenders Law;

and

- During your placement at the Centre:
 - you were sexually assaulted; and/or
 - you were subject to one or several of the following measures:
 - you were confined in an isolation cell for disciplinary or administrative purposes;
 - you were confined in a common area of the Centre for disciplinary or administrative purposes;
 - you were confined in your room for disciplinary or administrative purposes;
 - you were confined in a cell for disciplinary or administrative purposes;
 - you were confined in an intensive supervision unit for disciplinary or administrative purposes;
 - you were subjected to “stop action” for disciplinary or administrative purposes;
 - you were subjected to a withdrawal period (“timeout”) for disciplinary or administrative purposes;
 - you were subject to the use of force by any mechanical or physical means (for example, a straitjacket, handcuffs, or chains);
 - you were subject to the use of force by any chemical substances or medical intervention (for example, medication);
 - you were subjected to strip searches with or without touching.

WHO IS NOT A CLASS MEMBER?

Even if you meet the criteria mentioned above, you are not a class member if:

- You are a member of the group on behalf of which a class action was authorized against the Attorney General of Quebec and Santé Québec, acting through six (6) integrated university health and social services centres (also known as IUHSSC or CIUSSS) and ten (10) integrated health and social services centres (also known as IHSSC or CISSS), in connection with abuses committed in Youth Protection Centers against First Nations, Inuit, or Métis individuals (court file number 500-06-001265-236);.

or

- You are a member of the group on behalf of which a class action was authorized against les Sœurs de la Charité de Québec and the CIUSSS de la Capitale-Nationale in connection with the Mont d'Youville reception centre in Quebec City (Beauport), and you have not been admitted into another Centre (court file number 200-06-000221-187).

or

- You 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 (NPRDO) unless:
 - you were also admitted between October 1, 1950, and December 31, 1964, to Centres which are not covered by the NPRDO; or
 - you were also admitted or readmitted, on or after January 1, 1965, to any Centre.

WHAT IS THE PURPOSE OF THIS ACTION?
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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 principal questions to be decided in this class action are the following:

1. Have Class Members suffered sexual abuses?
2. Have Class Members been subject to any of the following Measures:
 - a. Placement in solitary confinement for disciplinary or administrative purposes;
 - b. Being prevented from leaving a common area for disciplinary or administrative purposes;
 - c. Being locked up in a “bedroom” or in a cell for disciplinary or administrative purposes;
 - d. Placement in an intensive supervision unit, in “stop action” or in a period of

- withdrawal (“time-out”) for disciplinary or administrative purposes;
- e. Use of force by any physical or mechanical means
 - f. Use of force involving any chemical substance or medical intervention;
 - g. Strip searches, with or without touching
3. Do the sexual abuses mentioned in paragraph 1 amount to a fault engaging the liability of the Attorney General of Québec?
 4. Does the usage of all or some of the Measures described in paragraph 2 amount to a fault engaging the liability of the Attorney General of Quebec?
 5. Do the sexual abuses mentioned in paragraph 1 amount to a fault engaging the liability of Santé Québec, with the rights and obligations of the establishments and acting through them?
 6. Does the usage of all or some of the Measures described in paragraph 2 amount to a fault engaging the liability of Santé Québec, with the rights and obligations of the establishments and acting through them?
 7. Are certain types of pecuniary damages caused by the findings of faults as per paragraphs 3 to 6 common to Class Members? Which ones?
 8. Can such pecuniary damages be subject to collective recovery? If so, for what amount?
 9. Are certain types of non-pecuniary damages caused by the findings of faults as per paragraphs 3 to 6 common to Class Members? Which ones?
 10. Can such non-pecuniary damages be subject to collective recovery? If so, for what amount?
 11. Are the Class Members entitled to punitive damages for measures, practices, or acts which they were subjected to prior to June 28, 1976?
 12. Are the Class Members entitled to punitive damages for measures, practices, or acts which they were subjected to after June 28, 1976?
 13. Can such punitive damages be subject to collective recovery? If so, for what amount?
 14. Are some or all of the claims of members prescribed?
 15. Must the damages to which the Class Members who are also Class Members in the *E.L. v. Attorney General of Québec et al* class action (500-06-001022-199) (“**E.L.**”) are entitled be adjusted if these members have already received compensation as part of this other class action, and if so, in what circumstances, at which stage, and according to which modalities?

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

WHAT IS BEING SOUGHT?

The representative plaintiff, A.D., seeks compensation for all class members and himself.

On behalf of the class members, he asks the Court to grant:

- pecuniary damages;
- non-pecuniary damages, which include financial compensation for pain, suffering, loss of enjoyment of life and other moral damages; and
- punitive damages, which are financial compensation to punish the defendants for their conduct.

If the class action is granted, the Court will determine the amount of the damages.

Lawyers' fees will only be paid only if the class action is granted. They must be approved by the Superior Court of Québec and may represent a percentage paid out of the damages paid to class members.

DO I NEED TO REGISTER TO JOIN THE CLASS ACTION?

No. You are not required to do anything in order to become a member of this class action.

You are automatically included in the class if you meet the above criteria.

Any class member who has not opted out of the class action at the latest on February 16, 2026, at 4:30 p.m., in the manner set forth below, will be bound by any judgment rendered in this class action.

A class member may seek to intervene in the class action. This request may be authorized by the Court if the Court considers it useful to the class.

A member of the class other than the representative plaintiff or a member who seeks to intervene in the class action cannot be required to pay the legal costs of the class action if the class action is dismissed.

HOW TO OPT OUT OF THE CLASS ACTION?

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 of the class by notifying the clerk of the Superior Court of Québec in the judicial district of Montreal, ideally by registered or certified mail, prior to the deadline for opting out of the class, at the following address:

Grefe civil de la Cour supérieure
Palais de justice de Montréal
1 Notre-Dame Street East
Montréal (Québec) H2Y 1B6

You must state that you wish to opt out of the class action of *A.D. v. Procureur général du Québec et al.* (case number: 500-06-001269-238).

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 the class action unless they discontinue their personal lawsuit prior to the deadline for opting out.

The deadline for opting out is February 16, 2026, at 4:30 p.m.

FOR MORE INFORMATION ABOUT THIS CLASS ACTION

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

Fax: 514 648-7700

Counsel for the representative plaintiff and the class members are:

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You can also consult the Class Actions Registry at the following website:
<https://www.registredesactionscollectives.quebec/fr/Consulter/ApercuDemande?NoDossier=500-06-001269-238>

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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