

CANADIAN HUMAN RIGHTS TRIBUNAL

BETWEEN:

**FIRST NATIONS CHILD AND FAMILY CARING SOCIETY OF CANADA and
ASSEMBLY OF FIRST NATIONS**

Complainants

- and -

CANADIAN HUMAN RIGHTS COMMISSION

Commission

-and-

ATTORNEY GENERAL OF CANADA
(representing the Minister of Indigenous Services Canada)

Respondent

- and -

**CHIEFS OF ONTARIO and
AMNESTY INTERNATIONAL CANADA and NISHNAWBE ASKI NATION**

Interested Parties

**WILL SAY STATEMENTS OF ZACHARIAH GENERAL,
LYNDIA JONES, and KURTIS MARTIN
(CHIEFS OF ONTARIO)**

Jordan's Principle Compliance and Implementation of 2025 CHRT 6

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WILL-SAY STATEMENT OF ZACHARIAH GENERAL

1. Witness Identification

Name: Zachariah General

Position: Health Director at Chiefs of Ontario

Anticipated Role in this Proceeding: fact witness

2. Qualifications

Zachariah General is the Health Director at Chiefs of Ontario (“COO”). Mr. General has held this role since May 2026. Mr. General has been employed at COO since 2020; prior to his current role, Mr. General was an Associate Health Director at COO and a Health Manager at COO. Mr. General has 16 years of experience working for First Nations. He holds a bachelor’s degree in Environment and Resource Studies and a master’s degree in Environment and Resource Studies, both from the University of Waterloo. Mr. General is a member of Lower Cayuga, a part of the Six Nations of the Grand River.

3. Overview of Anticipated Testimony

Mr. General is expected to testify about matters within his personal knowledge arising from his roles within COO. This is anticipated to include COO involvement in Jordan’s Principle implementation and reform, such as working with First Nations across Ontario to gather perspectives and experiences on Jordan’s Principle, participating in operational oversight of Jordan’s Principle with Indigenous Services Canada (“ISC”), and advocating for First Nations’-led solutions to challenges facing Jordan’s Principle.

4. Anticipated Evidence as Fact Witness

It is anticipated that Mr. General will provide evidence on:

(a) His background and experience, including:

- The mandate of COO Health.
- His role and responsibilities as Health Director at COO and his experience working on Jordan’s Principle matters with COO staff, COO political leadership, COO constituents, and other stakeholders.

(b) The experience of First Nations in Ontario with Jordan’s Principle, including:

- The importance of Jordan’s Principle for First Nations children and families in Ontario.
- How individual Jordan’s Principle requests affect First Nations children and families in Ontario.
- How group Jordan’s Principle requests affect First Nations children and families in Ontario.

- Feedback Mr. General has received from First Nations in Ontario on access to Jordan's Principle.
- (c) The mechanisms to oversee the implementation of Jordan's Principle ISC, including:
- The mandate of the Jordan's Principle Operations Committee ("JPOC").
 - COO's experience working within the JPOC.
- (d) The effect of the government of Canada's reliance on the February 10, 2025 Jordan's Principle Operational Bulletin: Updates to the Implementation of Jordan's Principle (the "Operational Bulletin"), including:
- The administrative and communication challenges experienced by COO with the introduction of the Operational Bulletin.
 - The impact of the requirement in the Operational Bulletin for a qualified professional letter for each child in group Jordan's Principle requests.
 - The impact of new administrative requirements in the Operational Bulletin on group Jordan's Principle requests.
 - The impact on First Nations children in Ontario of the Operational Bulletin's limitations on funding for education supports.
 - The impact on First Nations in Ontario of the Operational Bulletin's limitations on funding for service coordination.

WILL-SAY STATEMENT OF LYNDIA JONES

1. Witness Identification

Name: Lyndia Jones

Position: Director of Health, Independent First Nations (“IFN”)

Anticipated Role in this Proceeding: fact witness

2. Qualifications

Ms. Lyndia Jones has worked for the IFN for 28 years. She has served as a health liaison worker, health policy analyst and Director of Health. Ms. Jones is currently the Director of Health for the IFN; she has held that role for almost ten years. Ms. Jones is a member of Shawanaga First Nation.

3. Overview of Anticipated Testimony

Ms. Jones is expected to testify about matters within her personal knowledge arising from her role with the IFN, including the circumstances of IFN member First Nations, the establishment and operation of IFN Jordan’s Principle Finance, and IFN’s working relationship with Indigenous Services Canada (“ISC”). She is also expected to testify about the importance of Jordan’s Principle to children and families in IFN communities and the effects of the Jordan’s Principle Operational Bulletin on IFN’s finance and service coordination functions and on the children and families of IFN member communities.

4. Anticipated Evidence as Fact Witness

It is anticipated that Ms. Jones will provide evidence on:

(a) Her background and experience, including:

- Approximately 28 years of employment with IFN and the positions she has held.
- Her responsibilities as Director of Health and her experience working with IFN political leadership, children and families of IFN member communities, the IFN Jordan’s Principle Navigators, and ISC.

(b) The IFN, including:

- The membership of the IFN: who the Nations are, where they are situated, and general information on the populations served.
- The structure of the IFN as an organization.
- The way that government services are delivered within the IFN communities, including education and social programs for children and youth.

- What types of education and social programs are available within IFN communities and what types of education and social programs are not available within IFN communities.

(c) General information about Jordan's Principle within the IFN communities, including:

- The importance of Jordan's Principle for the IFN communities.
- The importance of First Nations involvement in Jordan's Principle service coordination and service delivery.
- The importance of culturally-based Jordan's Principle service coordination and service delivery.
- How Jordan's Principle has serviced IFN communities' children residing off-reserve.
- The barriers experienced by IFN communities' families in accessing government services, including racism, intergenerational trauma, poverty, and living in remote locations.
- Some data gathered by the IFN on access to Jordan's Principle by the IFN communities.
- Some examples of how Jordan's Principle has affected IFN children and families.

(d) The IFN's Jordan's Principle Finance initiative, including:

- What the IFN's Jordan's Principle Finance initiative is.
- Who the IFN Jordan's Principle Finance initiative serves.
- Why the IFN Jordan's Principle Finance initiative was created.
- The goals of the IFN Jordan's Principle Finance initiative.
- How the IFN Jordan's Principle Finance initiative works.
- How the IFN Jordan's Principle Finance initiative has worked with ISC to render payments to provincial school boards for First Nations that are not members of the IFN.
- The funding the IFN Jordan's Principle Finance initiative receives from ISC.
- The successes of the IFN Jordan's Principle Finance initiative.
- The challenges of the IFN Jordan's Principle Finance initiative.

(e) The effect of the government of Canada's reliance on the February 10, 2025 Jordan's Principle Operational Bulletin: Updates to the Implementation of Jordan's Principle (the "Operational Bulletin"), including:

- The impact of the Operational Bulletin on service coordination within the IFN communities and the effect of cuts to service coordination funding.

- The impact of the Operational Bulletin on the IFN Jordan's Principle Finance initiative.
- The impact on IFN communities' children of the Operational Bulletin restrictions on educational supports.
- The impact on IFN communities' children of the Operational Bulletin's restrictions on respite funding.
- The availability of qualified professionals who can provide letters of support for Jordan's Principle applications in the IFN communities.
- The impact on IFN communities' children of the Operational Bulletin's requirements for letters of support from qualified professionals.
- The impact of the requirement in the Operational Bulletin for a qualified professional letter for each child in group applications.

WILL-SAY STATEMENT OF KURTIS MARTIN

1. Witness Identification

Name: Kurtis Martin

Position: Program Manager, Maternal Child and Youth Health at Six Nations of the Grand River

Anticipated Role in this Proceeding: fact witness

2. Qualifications

Kurtis Martin is the Program Manager, Maternal Child and Youth Health, under the Department of Well-being at Six Nations of the Grand River. Mr. Martin has worked for Six Nations for approximately eight years. He began working as a Jordan's Principle Navigator in 2019 and subsequently served as a Senior Navigator and Supervisor before becoming a Program Manager. Mr. Martin holds a Bachelor of Health Science from Western University. Mr. Martin is a member of Six Nations of the Grand River.

3. Overview of Anticipated Testimony

Mr. Martin is expected to testify about matters within his personal knowledge arising from his work at Six Nations of the Grand River. This is anticipated to include his experience assisting children and families to access Jordan's Principle supports, the needs of children and families in Six Nations, barriers faced by children and families of Six Nations in accessing government services and supports. Mr. Martin is also expected to testify to changes to Jordan's Principle administration and documentation requirements, and the effect of the February 10, 2025 Jordan's Principle Operational Bulletin: Updates to the Implementation of Jordan's Principle (the "Operational Bulletin") on children, families, Jordan's Principle navigators, and service providers in Six Nations.

4. Anticipated Evidence as Fact Witness

It is anticipated that Mr. Martin will provide evidence on:

- His background and experience, including:
 - His role, responsibilities, and experiences as a Jordan's Principle Navigator, Senior Navigator, and Supervisor.
 - His experience assisting children and families with Jordan's Principle requests and working with Indigenous Services Canada ("ISC").
- The experience of children and families in Six Nations with Jordan's Principle, including:
 - The importance of Jordan's Principle for children and families in Six Nations.
 - The role of Jordan's Principle in addressing gaps in services available within the community.
 - The types of supports commonly requested by children and families in Six Nations.
 - Examples of individual and group Jordan's Principle requests and their effects on children and families.
- Barriers affecting access to Jordan's Principle supports for children and families in Six Nations, including:
 - Historical underfunding and the limited availability of services within the community.

- Transportation, poverty, and difficulties accessing physicians and other regulated professionals.
- The effects of intergenerational trauma and lack of trust in service providers.
- The documentation and application process for Jordan's Principle requests, including:
 - The documentation requirements that applied in the earlier years of Jordan's Principle implementation.
 - The increasing requirement from Jordan's Principle for physician letters and documentation from registered professionals.
 - The challenges families experience obtaining timely and sufficiently detailed professional documentation.
- The effect of the government of Canada's reliance on the Operational Bulletin, including:
 - The increased administrative and documentation burden on families, navigators, and Jordan's Principle staff.
 - The effect of delays, documentation requirements, and denials on whether families seek Jordan's Principle support.
 - Changes in referrals, applications, partial approvals, one-time approvals, and denials following the Operational Bulletin.
 - The impact on requests for necessities of life, education supports, tutoring, and support workers.
 - The effect of the Operational Bulletin on staff morale, program planning, and the ability to respond to children's needs.