



**VIA FACSIMILE**

October 25, 2012

**The Canadian Hockey League**  
305 Milner Ave. Suite 201  
Scarborough, ON M1B3V4

**Attention: Mr. David Branch, President**

-and-

**Hockey Canada**  
151 Canada Olympic Road SW  
Suite 201  
Calgary, Alberta T3B 6B7

**Attention: Mr. Bob Nicholson, President**

-and-

**The Ontario Hockey League**  
305 Milner Ave,  
Scarborough ON, M1B 3V4

**Attention: Mr. David Branch, Commissioner**  
**Mr. Ted Baker, Vice President**

-and-

**Barrie Colts**  
555 Bayview Drive  
Barrie, ON L4N 8Y2

**Attention: Mr. Howie Campbell, President**  
**Mr. Jason Ford, General Manager**

-and-

**Belleville Bulls**  
265 Cannifton Road  
Belleville, ON K8N 4V8

**Attention: Mr. Gord Simmons, President**  
**Mr. George Burnett, General Manager**

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the balfour building 119 spadina ave suite 801  
toronto ontario M5V 2L1  
tel 416.597.1500 fax 416.597.3299

[www.gibsonandbarnes.ca](http://www.gibsonandbarnes.ca)

**Brampton Battalion**  
7575 Kennedy Road S.  
Brampton, ON L6V 3N2

**Attention: Mr. Mike Griffin, President**  
**Mr. Stan Butler, General Manager**

-and-

**Erie Otters**  
201 East 8th Street  
Erie, PA 16503

**Attention: Mr. Sherwood Bassin, General Manager**

-and-

**Guelph Storm**  
55 Wyndham St. N., 2nd Fl.  
Guelph, ON N1H 7T8

**Attention: Mr. Rick Hoyle, President**  
**Mr. Mike Kelly, General Manager**

-and-

**Kingston Frontenacs**  
P.O. Box 665  
Kingston, ON K7L 4X1

**Attention: Mr. Doug Springer, President/Governor**  
**Mr. Doug Gilmour, General Manager**

-and-

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**Kitchener Rangers**  
400 East Avenue  
Kitchener, ON N2H 1Z6

**Attention: Mr. Craig Campbell, President**  
**Mr. Steve Spott, General Manager**

**London Knights**  
99 Dundas Street  
London, ON N6A 6K1

**Attention: Mr. Dale Hunter, President**  
**Mr. Mark Hunter, General Manager**

-and-

**Mississauga Steelheads**  
5500 Rose Cherry Pl.  
Mississauga, ON L4Z 4B6

**Attention: Mr. Elliott Kerr, President**  
**Mr. James Boyd, General Manager**

-and-

**Niagara IceDogs**  
35 Queen Street  
St. Catharines, ON L2R 5G4

**Attention: Ms. Denise Burke, President**  
**Mr. Marty Williamson, General Manager**

-and-

**Oshawa Generals**  
99 Athol Street East  
Oshawa, ON L1H 1J8

**Attention: Mr. Rocco Tullio, President/Governor**  
**Mr. Jeff Twohey, General Manager**

-and-

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**Ottawa 67's**  
220-700 Industrial Street  
Ottawa, ON K1G 0Y9

**Attention: Mr. Jeff Hunt, Team Owner/Governor**  
**Mr. Patrick Whalen, President/CEO**  
**Mr. Chris Byrne, General Manager**

**Owen Sound Attack**  
1900 3rd Ave. E.  
Owen Sound, ON N4K 6T5

**Attention: Mr. Bob Severs, Owner/President**  
**Mr. Dale DeGray, General Manager**

-and-

**Peterborough Petes**  
121 Lansdowne St. W.  
Peterborough, ON K9J 1Y4

**Attention: Mr. Jim Devlin, President**  
**Mr. Mike Oke, Manager of Player Personnel**

-and-

**Plymouth Whalers**  
14900 Beck Rd.  
Plymouth Twp, Michigan 48170

**Attention: Mr. Peter Karmanos Jr, Owner**  
**Mr. Michael Vellucci, President/General Manager**

-and-

**Saginaw Spirit**  
P.O. Box 6157  
Saginaw, MI 48608

**Attention: Mr. Richard J. Garber, Owner**  
**Mr. Craig Goslin, President**  
**Mr. Jim Paliafito, General Manager**

-and-

**Sarnia Sting**  
1455 London Road  
Sarnia, ON N7S 6K4

**Attention: Mr. Robert Caccarelli, Owner/Governor**  
**Mr. Larry Ciccarelli, Owner/President**  
**Mr. Jacques Beaulieu, General Manager**

**Sault Ste. Marie Greyhounds**

269 Queen St. E.

Sault Ste. Marie, ON P6A 1Y9

**Attention: Mr. Kyle Dubas, General Manager**

-and-

**Sudbury Wolves**

240 Elgin Street

Sudbury, ON P3E 3N6

**Attention: Mr. Blaine Smith, President/General Manager**

-and-

**Windsor Spitfires**

8787 McHugh Street

Windsor, ON N8S 0A1

**Attention: Mr. Bob Boughner, President  
Mr. Warren Rychel, General Manager**

Dear Sirs/Madam:

**Re: Canadian Hockey League Players' Association  
Minimum Employment Standards**

We are legal counsel to the Canadian Hockey League Players' Association (CHLPA) and its members in Ontario – which include both former and current players of the Ontario Hockey League (OHL). We are writing concerning the serious and ongoing violations by the OHL and all its member teams (Teams) of the minimum employment legislative standards. More specifically, there has been, and continues to be, flagrant breaches of the Employment Standards Act (Ontario), the Canada Pension Plan and the Employment Insurance Act. For instance, without limiting the generality of the foregoing, a failure to:

- pay the players at least the prescribed minimum wage;
- pay the players at least one and one-half times the prescribed minimum rate for each hour of work in excess of 44 hours in each work week;
- pay the players the required vacation pay;
- pay the players public holiday pay;

- pay the players termination and/or severance pay;
- make CPP and EI contributions on behalf of the players.

These violations are widespread across the Canadian Hockey League and further evident both the leagues and teams blatant disregard for the bare minimum working standards that have been set for employees.

We hereby demand the OHL and Teams to forthwith comply with the legislative working conditions in Ontario. In the event that these ongoing violations are not immediately rectified, please be advised that we intend to commence legal proceedings. Furthermore, we will take the necessary legal action should the OHL or any Team take any reprisal action, directly or indirectly, against any player(s) for exercising their legislative rights and remedies, which are also protected under the various employment statutes.

Saying that, and without prejudice to the aforementioned, should you wish to resolve this matter please contact us immediately. Otherwise, as mentioned above, we have been instructed to redress these matters with legal intervention and will be doing so quite expeditiously.

A copy of this letter is also being sent to the Canadian Hockey League and Hockey Canada.

Yours very truly,

**GIBSON&BARNES LLP**

  
Michael C. Mazzuca

*C.c Client*