

Ontario  
Superior Court of Justice

BETWEEN:

GAIL HERRINGTON

*Applicant*

-and-

IAN HARVEY and LAURENTIAN BANK OF CANADA

*Respondent*

**AFFIDAVIT of Meaghan Harvey**

- 1) **Meaghan Elizabeth Harvey, of the City of Fort Saskatchewan, in the Province of Alberta, MAKE OATH AND SAY:**
- 2) I am the daughter of Ian Harvey, respondent, and Gail Herrington, applicant, and have personal knowledge of the matter hereinafter deposed. I have reviewed Gail Herrington's Supplemental Affidavit and I wish to react to specific paragraphs as noted.
- 3) **Paragraph 18** I personally did not see any violence towards my mother, I do remember arguing but I also know that when my mother did leave, she did it without my father's knowledge and Rick was at the place that she took us too. I later learned from both of them that they had been having an affair for over a year in the house where we all lived while Rick was staying in the basement due to the separation between himself and his wife regarding his cocaine abuse
- 4) **Paragraph 22** My mother would tell us that my father had been abusive but I never saw anything to that effect and there was no violence towards myself or my brother from my father.

- 5) **Paragraph 23** The negative impact that I experienced was not from my father but instead from my step-father, Rick Pinto. I was constantly subjected to his anger and emotional abuse, sometimes bordering on physical. He would drink constantly and then berate me for hours. I can remember him yelling and spitting at me just inches from my face, his breath smelling like alcohol. He would tell me that I was no more than a piece of furniture in his house and that I was not wanted. That I was fat and ugly just like my father and that I was a “paki” and worthless (my father’s paternal side is from India). Sometimes he would berate me like this well into the night, until I was literally begging and crying for him to let me go to sleep. This went on for years. On multiple occasions teachers looked into my home life because they were concerned about my behaviour and some of the things that I would say about my life at home. I was sometimes forced to stand in the corner for days, only breaking to eat and sleep. I was not permitted to have any friends or socialize. In the house we were treated as if we were not there. It was a very lonely existence and I still battle with the emotional scars and depression/anxiety as a result of my time spent with them. Going to my fathers house was the most happy I can remember being at that age. Rick used to say I only liked to go to my fathers house because he bought us things. In fact, he did not spoil us financially at all, but it was an escape from the living situation that we were forced to stay in. I would always ask my dad why I couldn’t live with him. As soon as I turned 12 I told my father that I wanted to move in with him. I did not hesitate for a moment and nor did he in accepting my request.
- 6) Their drinking was a constant and they would segregate us from them as if they did not want to be reminded that we were there. It was also admitted to me by both my mother and Rick that there had been drug use in the house (Field Cres) while we were there. Looking back now I remember that often times after we were in bed I would smell the same burning smell that I now recognize to be crack cocaine (they admitted to using it during that time)
- 7) I developed a very unhealthy relationship with food as we were not permitted to eat meals with them. We were also forced to eat basically the cheapest easiest thing they could find while they ate MacDonalds or had Taco nights. Rick would punish me also by forcing me to eat marmalade sandwiches, which he knew I hated. I would be forced to eat every last bite even though I was gagging and crying. He would punish us by making the one of us who wasn’t “in trouble” eat sweets or treats in front of the one who was “in trouble”
- 8) He would also be very sexually inappropriate with us, me in particular. He never touched me but he made strange comments and would walk around naked talking about the size of his penis and comparing it to my father’s.
- 9) The isolation was perhaps the hardest. Forced to sit in the middle of my bed, no toys, no books, no human interaction for days at a time. Again, only breaking for food and sleep. I began to live in my head. By the age of 11 I began to contemplate suicide. How I would do it? I thought about hanging myself from the door knob in my room. I believe the only thing that gave me hope was knowing that at 12 I could leave and go to my fathers permanently.

- 10) My mother is a good person. She has made some very poor choices but I believe that to be because of the influence that Rick had over her. I think the choice that I am the most disappointed in her for is sitting back and doing nothing while her children were treated like prisoners. In saying that, I still love her very much and I am saddened by this entire situation as I know someone is bound to get hurt.
- 11) **Paragraph 24** I can remember clearly my mother was with Rick prior to her leaving the family home and Rick lived with us after she initially left. Rick was living in the house at 299 Warden Ave knowing that he was not supposed to be there.
- 12) **Paragraph 28** There was a lot of moving around when we were young but that was not the fault of my father. They were both able to work and they did sometimes. My father always paid his support on time but we saw very little of it. All of our clothes were from Goodwill, in fact, I think Rick would intentionally pick the ugliest things he could find and then force me to wear them to school to further humiliate me. This caused a lot of bullying for me at a young age. We lived in extremely poor conditions and I know we skipped out on rent more than once by moving late at night. I believe their drug and alcohol abuse contributed to their inability to stay afloat financially
- 13) 299 Warden Ave was our home. That's where my happiest memories are and where I continue to consider my home even though I have now moved to Edmonton. When I visit Toronto I stay at that house with my father and family. My father put his blood, sweat and tears into that home and struggled as a single father to raise children with emotional trauma. We were not easy children to raise after what we had been through but he did his absolute best and I never for one second thought that he didn't have mine and my brothers best interest at heart. I don't think I can say the same for my mother and Rick

Sworn before me at the City of Fort Saskatchewan in the Province of Alberta

On \_\_\_\_\_ 2018

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Meaghan Harvey

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Commissioner for Taking Affidavits

Court File No. CV-17-573587

Gail Herrington  
and Laurentian Bank of Canada

-and- Ian Harvey

Applicant  
Respondents