



CANADIAN HUMAN RIGHTS ACT

R.S.C. 1985, c. H-6

(As amended)

BETWEEN:

**Rob Wells
(Complainant)**

AND

**Craig Chandler, Concerned Christians Canada and Freedom Radio Network
(Respondents)**

MINUTES OF SETTLEMENT

The parties have had the opportunity to discuss the issues in complaints; 2005 2462, 2006 1187, 2006 1215, 2006 1236 in conciliation. . Although the parties do not necessarily agree on all of the matters raised in the complaints, they have agreed to the following settlement:

1. The Respondents publicly declare and affirm that they understand the purpose of the Canadian Human Rights Act and its principle that **“all individuals should have an opportunity equal with other individuals to make for themselves the lives that they are able and wish to have, and to have their needs accommodated, consistent with their duties and obligations as members of society without being hindered in or prevented from doing so by discriminatory practices based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability or conviction for an offense for which a pardon has been granted.”**
2. Effective immediately, the Respondents agree to remove the letter entitled “Homosexual Agenda Wicked”, as well as the material listed in Appendices A and B, from all web sites controlled by the Respondents including www.concernedchristians.ca, www.freetospeak.ca and www.freedomradionetwork.ca.
3. Effective immediately, the Respondents agree to cease and desist from posting any information on the internet, which would likely expose homosexual persons to hatred or contempt. This would include, but not necessarily be limited to, any messages with themes such as;
 - a) Homosexuals are conspiring against society
 - b) Homosexuals are sick, diseased or mentally ill.
 - c) Homosexuals are a threat to children or are seeking to have sexual relations with children.
 - d) Linking homosexuality with pedophilia
 - e) References to a homosexual or gay agenda, a homosexual machine or conspiracy
 - f) References to homosexuals as wicked or dangerous.
4. Effective immediately, the Respondents agree to cease and desist from posting any messages on the internet, including the messages listed in Appendix C, which retaliate or threaten retaliation against the Complainant for filing the above noted complaints.

5. Within thirty (30) days of receipt of the letter from the Canadian Human Rights Commission advising that it has approved this settlement, the Respondent Craig Chandler will provide the Complainant with a letter of apology (Appendix D). The letter of apology will be posted on the web sites of Concerned Christians Canada and Freedom Radio Network for a period of not less than two years. A copy of the Letter of Apology will be provided to the editor of the Red Deer Advocate newspaper with a request that the letter be published.
6. Within three months of receipt of the letter from the Canadian Human Rights Commission advising that it has approved this settlement, the Respondent Craig Chandler will contact the Canadian Human Rights Commission Regional office in Edmonton for the purpose of arranging and participating in an educational seminar on human rights law. The timing, location and content of this seminar will be determined in consultation with staff at the Regional office.
7. The Complainant agrees that this settlement is in full and final compensation for all incidents alleged in complaints; 2005 2462, 2006 1187, 2006 1215, 2006 1236 and forever releases and discharges the Respondent, its Directors, Officers and all other employees from all claims or causes of action arising out of the allegations in the complaints.
8. The Complainant and Respondent agree that this settlement is entered into without prejudice to either party and without any admission of liability or wrongdoing on the part of the Respondent with respect to the allegations in the complaints.
9. The Complainant acknowledges participating in the settlement of the complaints voluntarily, without threat or pressure, and in full understanding of the terms that have been agreed to. The Complainant has had adequate opportunity to seek advice with respect to the complaints and the terms of settlement.
10. The Complainant and Respondent agree that this settlement shall not take effect until it is approved by the Canadian Human Rights Commission. In the event that the Commission does not approve the settlement, this agreement shall be considered null and void.
11. The parties understand that, once approved, the Commission will monitor the settlement to ensure that the terms are carried out as stated in these minutes.
12. The parties consent to these minutes of settlement being made an order of the Federal Court for the purpose of enforcement pursuant to section 48 (3) of the *Canadian Human Rights Act*.
13. Once the settlement has been approved by the Commission, in the event of a disagreement as to the proper implementation of one or more of the terms of the settlement, the parties agree to return to mediation to attempt to resolve the issues in dispute. The parties further agree that any amendment achieved through these negotiations will be submitted to the Commission for approval pursuant to section 48 of the *Canadian Human Rights Act* and that the amendment will be subject to enforcement in Federal Court in the same manner as the original agreement.
14. The Complainant and the Respondent agree that the terms of this settlement shall not be confidential.

15. Within thirty (30) days of receipt of the letter from the date that the Canadian Human Rights Commission advises that it has approved this settlement, the Respondents agree to post a copy of this settlement agreement on the websites www.concernedchristians.ca, and www.freedomradionetwork.ca, excluding Appendices "A", "B", and "C", for a period of not less than two years. The Respondents agree that Appendices "A" "B" and "C" will not be published on any Internet websites under their control.
16. The Respondent Craig Chandler agrees to cooperate with the Complainant to ensure that the material referred to in paragraph 2 above is not posted on other internet sites. Should any of this material appear on the Internet, the Respondent Chandler agrees to submit a written request to the appropriate Internet Service Provider to have the material removed.

Dated at EDMONTON ALBERTA this 6th day of MARCH 20 07

Rob Wells
Rob Wells (Complainant)

Chabelle
Witness Signature

Dated at CALGARY, ALBERTA this 9th day of MARCH 20 07

[Signature]
For the Respondents (Craig Chandler,
Concerned Christians Canada and
Freedom Radio Network)

[Signature]
Witness to Signature

Approved by the Canadian Human Rights Commission at Ottawa
this 20th day of April 2007 pursuant to subsection 48(1) of the
Canadian Human Rights Act.

[Signature]
Canadian Human Rights Commission
Secretary to the Commission