
Court File No. CV-16-550599

ONTARIO SUPERIOR COURT OF JUSTICE

BETWEEN:

KEVIN ARRIOLA and ALEXANDRA GODLEWSKI

Applicants

- and -

RYERSON STUDENTS' UNION

Respondent

CROSS-EXAMINATION OF OBAID ULLAH
held at the offices of ASAP Reporting Services Inc.,
333 Bay Street, Suite 900, Toronto, Ontario,
on Tuesday, January 17, 2017, at 11:25 a.m.

CONDENSED TRANSCRIPT WITH WORD INDEX

APPEARANCES:

Mr. Marty Moore on behalf of the Applicants
Mr. Alan Honner

Ms. Alexi Wood on behalf of the Respondent
Ms. Jennifer Saville
Ms. Stacey MacTaggart

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& UNDER ADVISEMENTS

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22,27,48,90,91

Refusals (REF) found at pages:

12,29,75

Under Advisement (U/A) found at page:

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1 Toronto, Ontario
2 --- Upon commencing on Tuesday, January 17, 2017,
3 at 11:25 a.m.
4 AFFIRMED: OBAID ULLAH
5 CROSS-EXAMINATION BY MR. MOORE:
6 1 Q. Good morning, Mr. Ullah.
7 A. Good morning.
8 2 Q. Could you state your name
9 and spell it for the record, please.
10 A. My name is Obaid Ullah.
11 First name O-b-a-i-d, last name U-l-l-a-h.
12 3 Q. Thank you. You have
13 affirmed to tell the truth today. Is that
14 affirmation binding on your conscience?
15 A. Yes.
16 4 Q. The answers that you
17 provide to questions today, are they binding on
18 the Ryerson Students' Union?
19 A. Yes.
20 5 Q. When I say RSU, you
21 understand that I am referring to Ryerson
22 Students' Union?
23 A. Yes.
24 6 Q. When I say MIAS or men's
25 issues club, you understand that I am referring to

1 the Men's Issues Awareness Society that was formed
2 at Ryerson in 2015?
3 A. Yes.
4 7 Q. Thank you. You mention
5 in your affidavit that Ryerson Students' Union is
6 not controlled by the university at paragraph 7.
7 Does RSU have an agreement with Ryerson
8 University?
9 A. Yes.
10 8 Q. Has that agreement been
11 provided in this application in any way?
12 MS. WOOD: No.
13 MR. MOORE: Could I request an
14 undertaking to get the agreement between Ryerson
15 University and the RSU?
16 U/A MS. WOOD: I am going to take
17 that under advisement because I am not sure it is
18 a public document. I don't have a copy of it. I
19 haven't seen it. I need to review what that
20 document is before I can agree to that.
21 MR. MOORE: I would submit on
22 the record that it is relevant to paragraph 7 of
23 the affidavit.
24 9 Q. In your position as
25 president of RSU, do you work in collaboration or

1 connection with Ryerson University?
2 A. Yes.
3 10 Q. Do you do so on the basis
4 of documents?
5 A. It is variable, so no.
6 11 Q. Does Ryerson University
7 provide funding to RSU?
8 MS. WOOD: The university?
9 MR. MOORE: Yes.
10 12 Q. How does RSU receive its
11 funding?
12 A. Through our levy.
13 13 Q. How is your levy
14 collected?
15 A. Through the fees office
16 of the university.
17 14 Q. The fees office of
18 Ryerson University?
19 A. Yes.
20 15 Q. Ryerson University then
21 provides that levy to RSU?
22 A. Yes.
23 16 Q. Do you know what that
24 levy is currently per student?
25 A. Approximately, it is

1 \$123, somewhere in that ballpark.
2 17 Q. Is that an annual fee?
3 A. Yes, it is an annual fee.
4 18 Q. Which covers two
5 semesters?
6 A. Yes, it is the whole
7 year. It covers the whole school year.
8 19 Q. Does every full-time
9 student at Ryerson University pay this levy?
10 A. Yes.
11 20 Q. Are they required to pay
12 this levy?
13 A. Yes.
14 21 Q. Who requires them to pay
15 this levy?
16 A. The Ryerson Students'
17 Union and the Ryerson University.
18 22 Q. Can they opt out of
19 paying this levy?
20 A. No.
21 23 Q. Do you know how many
22 students are at Ryerson University?
23 A. At Ryerson University
24 itself, no. As RSU members, approximately, yes.
25 24 Q. How many RSU members are

1 there?
2 A. Approximately 34,000 to
3 35,000.
4 25 Q. Do you know how much of
5 RSU's budget is allocated to student groups and
6 student group activities?
7 A. Yes.
8 26 Q. Could you give us that
9 number?
10 A. For student groups
11 itself, it is approximately \$120,000 or \$130,000 a
12 year for all student groups combined in grant
13 funding and in base funding, it is approximately
14 \$60,000 to \$70,000. I don't remember exact
15 numbers, but those are in the ballpark range.
16 27 Q. You have approximately 80
17 recognized student groups at Ryerson under the
18 Ryerson Students' Union?
19 A. It is more, 98, I
20 believe. From my last recollection, it is 98
21 student groups.
22 28 Q. Each student group gets a
23 base funding? What is that amount?
24 A. I am not sure about the
25 98 number either, but I know we have course union

1 student groups and affiliate groups, and we have
2 53 course unions. I cannot recall what the exact
3 number of student groups is. I am not sure if it
4 is 60 or 80 or 98, but it is a high number.
5 29 Q. The course unions, do
6 they get the same amount of base funding as the
7 student groups?
8 A. Yes.
9 30 Q. Is that base funding
10 amount \$1,200?
11 A. For the whole year.
12 31 Q. Yes. Then recognized
13 student groups and course unions can apply for
14 this additional grant funding?
15 A. Yes.
16 32 Q. Which you indicated is at
17 \$120,000 to \$130,000 a year?
18 A. Yes.
19 33 Q. Turning to page 5 of your
20 affidavit, before I get to that question, can a
21 non-student group, and I think that is how it is
22 referred to in your affidavit, a non-RSU club, can
23 a non-RSU club receive this grant funding that you
24 were talking about?
25 A. No.

1 34 Q. No mentioned at
2 paragraph 14K, at the top of page 5, that non-RSU
3 clubs can apply for student initiative funds or
4 sponsorships or directly to RSU for funding?
5 MS. WOOD: Directly to the
6 university.
7 MR. MOORE: Thank you for that
8 clarification. Directly to the university for
9 funding.
10 35 Q. Could you indicate or
11 direct me to a policy or provision that states
12 that students or non-RSU clubs can apply to a
13 student initiative fund?
14 A. Can you clarify that?
15 36 Q. You state that non-RSU
16 clubs can apply for funding from the student
17 initiative fund?
18 A. Yes.
19 37 Q. Are you aware of any
20 policy or provision that --
21 A. The guidelines for the
22 student initiative fund are on the web site, and
23 the student initiatives fund is a separate pool of
24 funding that is managed by the university, not by
25 the Ryerson Students' Union, and students and

1 student groups all have access to apply for that.
2 38 Q. In regards to applying
3 for sponsorships from the RSU, could you indicate
4 or are you aware of a specific provision that
5 provides that non-RSU clubs can apply for
6 sponsorships from the RSU?
7 A. Are you asking me to
8 refer to a specific policy?
9 39 Q. Yes.
10 A. I can check in the policy
11 manual.
12 40 Q. Yes, please.
13 A. The way it works at the
14 moment is that there is a sponsorship form that we
15 have filled out at the front desk and groups that
16 are not a part of the RSU can apply for that
17 sponsorship form for a certain amount, and that is
18 brought to the executive committee to be decided
19 upon. I will look for a specific policy, though.
20 41 Q. Thank you.
21 A. It is operational policy
22 number 33.
23 MS. WOOD: Page 134 of our
24 record.
25 MR. MOORE:

1 42 Q. Thank you for that. Has
2 RSU ever extended sponsorship to any events held
3 by MIAS?
4 A. Not that I am aware of.
5 43 Q. Has Ryerson Students'
6 Union ever indicated that MIAS could apply for
7 such sponsorship?
8 A. Not that I am aware of.
9 44 Q. In regards to
10 post-secondary education, RSU believes that access
11 to post-secondary education is a right. Correct?
12 A. Yes.
13 45 Q. That is stated at policy
14 number 14 in your policy manual in regards to
15 tuition fees?
16 A. Which policy?
17 46 Q. Policy 14.
18 A. Is it an operational
19 policy?
20 47 Q. No.
21 A. Yes.
22 48 Q. By reading the first line
23 of the second paragraph, the Students' Union
24 believes that access to post-secondary education
25 is a right. Did I read that correctly?

1 them. The policy says what it says.
2 MR. MOORE:
3 52 Q. RSU is a member of the
4 Canadian Federation of Students. Correct?
5 A. Yes.
6 53 Q. Do policies of the
7 Canadian Federation of Students bind RSU, as well?
8 A. Can you clarify the word
9 bind?
10 54 Q. Is RSU obligated to adopt
11 the policy positions of the Canadian Federation of
12 Students?
13 A. We are not obligated, but
14 we support them.
15 55 Q. To clarify, RSU has a
16 choice to support the policy positions of the
17 Canadian Federation of Students?
18 A. Yes.
19 56 Q. Turning over the page to
20 page 100, which is issues policy number 15,
21 women's issues, did RSU base its decision not to
22 recognize MIAS on this policy located at --
23 A. It was one of the
24 reasons.
25 57 Q. Was it based on this

1 A. Yes.
2 49 Q. Who should pay for this
3 post-secondary education, according to this
4 policy?
5 A. I will just take a moment
6 to read over the policy if that is okay.
7 50 Q. Sure. Directing your
8 attention to 14.2 and then the first section
9 there, reading that, the establishment of a
10 high-quality publicly funded system of
11 post-secondary education that removes any and all
12 financial barriers to participation.
13 In reference to a publicly
14 funded system of post-secondary education, does
15 that imply that the government funds this
16 education?
17 A. Yes.
18 51 Q. Removing all financial
19 barriers to participation, would that include
20 removing all fees from the post-secondary
21 education system?
22 REF MS. WOOD: I think these
23 questions are hypothetical. The policy is an
24 aspirational policy. I think these questions are
25 veering into hypothetical. I am going to stop

1 version solely of the women's issue policy, or was
2 it also based on the version that was amended in
3 2013?
4 A. The updated policy is the
5 one that is always used.
6 58 Q. The decision not to
7 recognize MIAS was based on the updated 2013
8 policy?
9 A. Yes.
10 59 Q. Not the one that is
11 currently in the policy manual?
12 A. Yes.
13 60 Q. Is there a reason why RSU
14 has not placed their updated policy in their
15 policy manual?
16 A. Not that I am aware of.
17 Could have been just a mishap or nobody caught it.
18 61 Q. Is the updated women's
19 issues policy readily available to members of
20 Ryerson Students' Union?
21 A. I don't know.
22 62 Q. Did Ryerson Students'
23 Union specifically point out to MIAS that they
24 were addressing them based off of a new women's
25 issues policy or an amended women's issues policy

1 rather than the one in the policy manual?
2 A. Sorry. Could you repeat
3 that?
4 63 Q. Did the Ryerson Students'
5 Union point out to MIAS that they were making
6 their decision based off an amended policy that is
7 not contained in the policy manual?
8 A. I don't know.
9 64 Q. One of the principles of
10 the women's issues policy is to oppose the
11 exclusion, exploitation, and marginalization of
12 women, whether directly or indirectly, within
13 patriarchal societies.
14 Does discussing men's issues
15 such as higher male suicide rates exclude, exploit
16 or marginalize women?
17 MS. WOOD: Are you asking his
18 personal opinion?
19 MR. MOORE: I am asking his
20 opinion in his position as president of RSU in
21 interpreting RSU's own policies.
22 MS. WOOD: I don't think that
23 is a fair question to put to him. You are asking
24 him -- he doesn't speak as one voice. It would be
25 something that would be put to the board, to the

1 executive. He can't do that without consultation
2 with his other individuals, and I also don't see
3 how that is remotely relevant to this. You have
4 the reasons for why it was denied. You can't pick
5 and choose various parts of it and ask him for his
6 personal view on it.
7 MR. MOORE:
8 65 Q. You were involved in the
9 decision process concerning the Men's Issues
10 Awareness Society. Correct?
11 A. Yes.
12 66 Q. In any of those
13 discussions, was it found that discussing men's
14 issues such as high male suicide rates would
15 exclude, exploit or marginalize women?
16 MS. WOOD: That is a fair
17 question.
18 THE WITNESS: My issues that I
19 stated as the committee's issues are stated in my
20 affidavit and stated in the exhibits.
21 MR. MOORE:
22 67 Q. Okay. I am asking you a
23 different question. I am asking you if during the
24 decision process of the RSU considering the MIAS
25 application, whether discussing men's issues was

1 viewed as exploiting, excluding or marginalizing
2 women?
3 MS. WOOD: In other words, at
4 any point in the student group's committee
5 discussion do you recall a discussion where that
6 section was lifted and people specifically said
7 that one phrase of discussing men's suicide rates,
8 that that directly contravenes that other phrase
9 that has been read to you? Was there a discussion
10 of that?
11 THE WITNESS: No.
12 MR. MOORE:
13 68 Q. In the decision process
14 of RSU, was anything brought up that discussing
15 any men's issues would exploit, exclude or
16 marginalize women?
17 MS. WOOD: I don't understand
18 the question. Discussing any men's issues? That
19 is far too broad.
20 MR. MOORE:
21 69 Q. I will rephrase the
22 question. Was it the opinion of RSU in deciding
23 MIAS's application that having a group that
24 discusses men's issues such as suicide rates,
25 homelessness or other men's issues would exclude,

1 exploit or marginalize women?
2 A. No.
3 70 Q. In the discussions and
4 decision-making process of RSU, was it considered
5 to be misandry to have a student group that
6 focused on generating discussions and bringing
7 social issue awareness to issues that
8 disproportionately affect men and boys?
9 A. Sorry. Could you repeat
10 the question?
11 71 Q. In the decision-making
12 process of RSU, was it considered to be misandry
13 to have a student group whose focus was on
14 generating discussions and bringing social
15 awareness to issues that disproportionately affect
16 men and boys?
17 MS. WOOD: I am going to stop
18 this line of questioning. You are asking
19 hypotheticals that weren't actually put to the
20 committee. If you are asking him to go back and
21 put additional hypotheticals to the committee,
22 that is one thing. The committee was presented
23 with an application that was writ large. You
24 can't now focus on one narrow issue and say, "Did
25 the committee discuss this," because that is not

1 the question that was put to the committee. You
2 are asking him a hypothetical that doesn't exist.
3 MR. MOORE: The committee has
4 made a decision based on a policy, and I am
5 seeking to understand which parts of that policy
6 the decision was based on.
7 MS. WOOD: That is fine if you
8 want to ask him that, but you are picking out
9 narrow aspects of the MIAS application to put to
10 him, and that is not how the student committee
11 viewed it. The student committee viewed MIAS's
12 application as a whole. You can't now pick and
13 choose various pieces of it and put it to him:
14 Did they point to this policy? That is a
15 hypothetical. You can ask him what the student
16 group committee looked at.
17 MR. MOORE: That is a question
18 of fact. I am asking specific questions.
19 MS. WOOD: You haven't
20 established that that was what was put to the
21 committee. If you want to say, "Was this aspect
22 considered by the committee," you need to build
23 that foundation, and until we know that the
24 committee actually was put to that specific
25 aspect, you can't ask him what policies they

1 considered, because we don't even know if the
2 committee was looking at that narrow sliver of the
3 application.
4 MR. MOORE:
5 72 Q. Did the committee
6 consider the concept of misandry in its
7 discussions?
8 A. Sorry. Misandry?
9 73 Q. Misandry. Do you recall
10 the committee considering the concept of misandry
11 in its discussions?
12 A. I don't remember what
13 concept.
14 74 Q. Let me put it to you this
15 way. Do you recall the committee considering any
16 specific provisions of MIAS's constitution that
17 violated RSU policies?
18 A. I will go over the
19 meeting minutes and see if I recall. Can you
20 repeat the question?
21 75 Q. Do you recall the RSU
22 having found any provisions of the MIAS
23 constitution to violate RSU policies?
24 A. Yes.
25 76 Q. Which provisions were

1 those?
2 A. The reason is mentioned
3 in section M of the affidavit, no? These are the
4 issues of the concerns that the committee had.
5 77 Q. After this document at
6 section M was provided, MIAS submitted a revised
7 constitution. Correct?
8 A. Yes.
9 78 Q. Did the committee review
10 that revised constitution?
11 A. That was forwarded to the
12 executive committee.
13 79 Q. Yes. Did RSU review that
14 revised constitution?
15 A. Yes.
16 MS. WOOD: What do you mean by
17 RSU? He said it was sent to the executive
18 committee.
19 MR. MOORE:
20 80 Q. I guess RSU acting
21 through its authorized officers, whether the board
22 of directors or the executive committee find that
23 that revised constitution violated any provisions
24 of the RSU policies or rules?
25 A. From what I recall, there

1 were changes that were made, but the changes were
2 not sufficient enough.
3 81 Q. Could you specify which
4 provisions of the constitution continued to not be
5 specific enough to meet RSU policies, if I
6 understand your answer correctly?
7 MS. WOOD: Do you recall if
8 there were specific provisions, or was it a bigger
9 picture issue?
10 THE WITNESS: It was a bigger
11 picture issue. That is what I recall.
12 U/T MS. WOOD: If there were
13 specific provisions, we can undertake to provide
14 them. I don't think it is specific provisions,
15 but we can undertake to provide that.
16 MR. MOORE: I would accept
17 that undertaking to provide specific, if there
18 were specific provisions.
19 82 Q. In your answer, you
20 indicated, if I recall correctly, that changes
21 were made but they weren't specific enough. What
22 were you referring to by that?
23 U/T MS. WOOD: We will include
24 that in the undertaking. We will answer your
25 question with regard to what the changes were and

1 what the committee considered the changes, where
2 the deficiencies were, if there were specifics,
3 which I am not sure there were, but if there were,
4 we will provide that.
5 MR. MOORE:
6 83 Q. Any member of RSU can
7 create a group and apply for student group
8 recognition. Correct?
9 A. Yes.
10 84 Q. That is their right, to
11 apply for student group recognition?
12 A. Their right to apply?
13 85 Q. Yes.
14 A. Yes.
15 86 Q. At paragraph 21 of your
16 affidavit, the last line of that paragraph, you
17 indicate that a student group status can be denied
18 if, reading the last portion of the last two
19 lines, if the proposed student group is
20 incompatible with the policies or bylaws of the
21 RSU.
22 Is there a specific provision
23 or policy within the RSU manual that states that a
24 student group status can be denied if it is
25 incompatible with the policies or bylaws of the

1 reasons, but that says incompatible with the
2 policies or bylaws of RSU.
3 MR. MOORE: I wasn't looking
4 for counsel to answer that question. I will ask
5 it again.
6 90 Q. When you refer to a
7 student group being incompatible in section 21,
8 you have indicated that you are referring to
9 policy 36.2. Correct?
10 A. Yes.
11 91 Q. Policy 36.2 states that a
12 student group's actions must not be contrary to
13 the Ontario Human Rights Code, RSU or university
14 policies. Correct?
15 A. Yes.
16 92 Q. Are there other
17 provisions that interpret what it is to be
18 incompatible with RSU as stated in paragraph 21 of
19 your affidavit?
20 MS. WOOD: I don't understand
21 the question.
22 MR. MOORE:
23 93 Q. In paragraph 21 of the
24 affidavit, if a student group is incompatible with
25 the policies or bylaws of RSU, its student group

1 RSU?
2 MS. WOOD: He is looking at
3 the student group policy at page 137 of the
4 record.
5 THE WITNESS: Yes.
6 MR. MOORE:
7 87 Q. Which specific policy is
8 that?
9 A. It is 36.
10 88 Q. Can you point out where
11 it requires that if a student group is
12 incompatible with RSU policies, its recognition
13 must be or can be denied?
14 A. In 36.2, it says a
15 student group's actions must not be contrary to
16 the Ontario Human Rights Code's, RSU's or the
17 university's policies.
18 89 Q. What you mean in
19 paragraph 21 of your affidavit when you mention
20 incompatible is that its actions must not be
21 contrary to the Human Rights Code, RSU or
22 university policies. Correct?
23 MS. WOOD: No, he means that
24 it can be denied if it is incompatible with the
25 policies or bylaws of RSU. There could be other

1 status can be denied. You have directed me to
2 36.2 in your policy manual as the basis for that
3 statement.
4 Are there other specific
5 provisions in the policy manual that provide a
6 basis for that statement?
7 MS. WOOD: I am still not
8 understanding. Are you asking him what he means
9 by this statement? If so, just ask him that. I
10 am not sure what your question is asking.
11 MR. MOORE:
12 94 Q. For the specific
13 statement that if a proposed student group is
14 incompatible with the policies or bylaws of RSU,
15 its status can be denied. For that specific
16 statement, are there any provisions in addition to
17 36.2 on which that statement is based?
18 A. Are you asking if there
19 are more policies or that is the only one?
20 95 Q. Yes.
21 A. I would have to go
22 through the policy manual.
23 96 Q. As you sit here today,
24 you are not aware of any other specific
25 provisions?

1 U/T MS. WOOD: We are happy to
2 take that by way of undertaking, unless you want
3 him to sit here and go through the whole manual.
4 MR. MOORE:
5 97 Q. I am asking for your
6 understanding right now as you sit here.
7 A. My understanding is that
8 I would like to go through the policy manual
9 before I respond to anything.
10 98 Q. Off the record for a
11 moment.
12 --- (Off-record discussion)
13 MR. MOORE: I will accept your
14 undertaking to look into that question.
15 MS. WOOD: Thank you.
16 MR. MOORE:
17 99 Q. Mr. Ullah, are you aware
18 of what RSU's understanding of what it means to be
19 incompatible with the policies and bylaws of RSU
20 is? Could you define for me --
21 MS. WOOD: Are you asking him
22 what he thinks it means?
23 MR. MOORE: What his
24 understanding of that statement is.
25 MS. WOOD: Why don't you just

1 have to believe in the policies and policy
2 positions of RSU in order not to be incompatible?
3 A. No.
4 104 Q. In the interest of
5 understanding that further, if a student group has
6 discussions that do not adopt the policy views of
7 the RSU as stated in its manual, is that being,
8 quote, incompatible with the policies and bylaws
9 of the RSU?
10 REF MS. WOOD: Don't answer that.
11 That is hypothetical and overly broad. If they
12 have discussions? We don't know what that means.
13 That is a ridiculously vague question. We would
14 need some kind of specifics around that before he
15 could answer that.
16 MR. MOORE:
17 105 Q. Is there another RSU
18 student group that has as its focus generating
19 discussions and bringing social awareness to
20 issues that disproportionately affect men and
21 boys?
22 A. Could you repeat that?
23 106 Q. Is there another RSU
24 student group other than MIAS that has as its
25 focus generating discussions and bringing social

1 ask him that. Ask him what he thinks it means.
2 MR. MOORE:
3 100 Q. Yes, could you explain to
4 me what it means to be incompatible with the
5 policies and bylaws of RSU?
6 A. Could you repeat that one
7 more time, just for clarification?
8 101 Q. Could you explain to me
9 what it means to be incompatible with the policies
10 and bylaws of RSU as stated in your affidavit at
11 paragraph 21?
12 MS. WOOD: He is asking you
13 about this last clause, the proposed student group
14 is incompatible with the policies or bylaws of
15 RSU. What do you think that sentence means?
16 THE WITNESS: It means when a
17 student group does not follow the policies and
18 bylaws of the Ryerson Students' Union.
19 MR. MOORE:
20 102 Q. If its actions do not
21 follow the policies and bylaws of the Students'
22 Union, does that mean it is incompatible? Is that
23 what it means? To follow?
24 A. Yes.
25 103 Q. Does a student group also

1 awareness to issues that disproportionately affect
2 men and boys?
3 A. No.
4 107 Q. Would now be a good time
5 to take a break for lunch? It is 12:15.
6 --- Recess taken at 12:13 p.m.
7 --- Upon resuming at 12:55 p.m.
8 MR. MOORE:
9 108 Q. I would like to direct
10 your attention, Mr. Ullah, to Exhibit M of your
11 affidavit. These are called committee concerns or
12 written reasons from the committee. I would like
13 to ask you some questions about them.
14 In paragraph 2, under number 1,
15 safety, the committee concerns state that the
16 group was not taking all the proper safety
17 measures, and then the sentence goes on.
18 Could you identify what all the
19 proper safety measures are that they are referring
20 to there?
21 A. I can't identify all. I
22 don't know off the top of my head all the safety
23 measures, but the safety measures that are talked
24 about in here, from my knowledge, is making sure
25 that students have a space on campus to be safe

1 and ensuring that you put it in the constitution,
2 ensuring that the group commits to certain things
3 and has measures in place to work towards certain
4 things.
5 109 Q. Can I take those step by
6 step? Which provision would a group have to have
7 in its constitution in order to meet this, quote,
8 proper safety measures?
9 A. There is specifics of
10 following the policy, and then there are specifics
11 of making sure that students are happy or safe on
12 campus. Safety is of concern when there are
13 complaints, there is awareness, stuff like that,
14 or if you are doing an activity on campus and
15 igniting a risk measure.
16 For example, when we do an
17 event, we make sure there are certain safety
18 measures in place, like security, risk
19 assessments, police reach-out, stuff like that.
20 That would vary between different student groups.
21 Each student group, depending on their mandate,
22 would have different measures in place.
23 110 Q. Is it the responsibility
24 of an individual student group to make sure that
25 students are happy?

1 A. Happy is a different
2 term. They cater to the students that they
3 believe in. Happy is not, so no.
4 111 Q. Is it the responsibility
5 of a student group to make sure that all students
6 feel safe?
7 A. Yes.
8 112 Q. Could you indicate which
9 RSU policy requires that a student group make all
10 students feel safe?
11 A. Is it not 36.2?
12 Operational 36? Operational policy 36, section
13 36.2, student group's action must not be contrary
14 to the Ontario Human Rights Code, RSU or the
15 university's policies.
16 113 Q. Can you state which
17 actions of MIAS violated that provision?
18 A. I don't know.
19 114 Q. Do you recall any
20 discussions about which actions of MIAS violated
21 that provision?
22 A. From what I recall, the
23 discussion was more about if the group got
24 approved, that it would cause safety concerns, not
25 that if the group currently right now is causing

1 safety concerns at the initial committee meeting.
2 115 Q. Subsequently, were there
3 any specific actions that MIAS had already taken
4 that violated or were deemed to have violated that
5 provision?
6 A. Not MIAS.
7 116 Q. Back to Exhibit M, in the
8 first sentence of the committee concerns document,
9 it states that the group was not aware that having
10 certain speakers and events could cause an unsafe
11 learning environment for women identified
12 students.
13 Would I be correct to assume
14 that RSU was aware that certain speakers and
15 events could cause an unsafe learning environment?
16 A. Kevin presented a list of
17 speakers potentially that they might bring to the
18 committee, so the committee had that discussion of
19 certain speakers, and there were names of
20 individuals identified.
21 117 Q. Which names and
22 individuals identified?
23 A. The discussion and
24 concern, they are in the meeting minutes.
25 118 Q. Could you direct me to

1 which individuals or events would in the RSU's
2 opinion create an unsafe learning environment?
3 Could you direct me to that portion of the
4 minutes?
5 A. Page 177, third-last
6 sentence.
7 119 Q. That sentence doesn't
8 list any names or any speakers or events that
9 would cause a concern. It doesn't identify that.
10 Could you --
11 A. Page 178, second line.
12 120 Q. Am I correct to assume
13 that Lynn McDonald was a speaker who would cause
14 an unsafe learning environment in the opinion of
15 RSU?
16 MS. WOOD: She is an example.
17 MR. MOORE:
18 121 Q. Can I clarify that
19 answer? Was Lynn McDonald one of the speakers who
20 in the opinion of RSU would create an unsafe
21 learning environment?
22 A. She is an example.
23 122 Q. An example of what?
24 A. Of the many speakers that
25 could potentially create safety concerns.

1 123 Q. Are there any other names
2 or events that you could identify?
3 A. Not that I know of.
4 124 Q. Was there anything
5 particular about Lynn McDonald that was identified
6 as being a risk of creating an unsafe learning
7 environment?
8 A. I don't recall much.
9 125 Q. Were there concerns that
10 Lynn McDonald would physically threaten students?
11 A. No.
12 126 Q. Were there concerns about
13 what Lynn McDonald would say?
14 A. I believe so.
15 127 Q. Are you aware of what
16 those concerns were?
17 A. The main overall concern
18 was the safety for students on campus and for
19 students identified as women for feeling unsafe
20 because of the different discussions and the
21 environment it creates.
22 128 Q. What criteria would RSU
23 use to determine whether there is an unsafe
24 learning environment for students?
25 A. What do you mean by that?

1 and respect each other's beliefs, yes.
2 134 Q. Do you have any policies
3 that outline that requirement for student groups?
4 A. They are in the RSU
5 policy manual, and student groups are mandated to
6 follow the RSU policy manual.
7 135 Q. You have pointed me to
8 policy 36.2. It doesn't specifically reference
9 safety. Is there another policy that you can
10 direct me to that references this concept of
11 making students feel safe and that requirement
12 being on student groups?
13 A. Not that I can recall.
14 136 Q. How does RSU evaluate
15 whether clubs are complying with the requirement
16 to make other students feel safe?
17 A. Our campus groups
18 coordinator works with the student groups to see
19 what type of events they are doing. We have a
20 booking system. We book their events. Have to
21 apply for grants. They come back to the committee
22 to present for their grants. If anything along
23 those lines of those processes comes as alarming,
24 then it is brought forward to the attention and it
25 is discussed whether the event is safe or not.

1 129 Q. How would RSU determine
2 whether there is an unsafe learning environment
3 for students?
4 A. When students come
5 forward and say that there is a problem and they
6 file a complaint. Then it gets looked into.
7 130 Q. Is that complaint
8 evaluated with any criteria to determine whether
9 there is a safety concern?
10 A. I don't know.
11 131 Q. Does the existence of
12 people feeling unsafe create a, quote, unsafe
13 learning environment?
14 A. Can you repeat that?
15 132 Q. If people complain that
16 they feel unsafe, does that create an unsafe
17 learning environment?
18 A. Yes.
19 133 Q. Do you address with other
20 clubs and require that they have, quote, all the
21 proper safety measures in place?
22 A. Proper safety measures
23 entailing that students are respected and that
24 students have a space where they can feel
25 themselves and they have that opportunity to grow

1 137 Q. Would it be accurate to
2 say that the most significant indication of
3 whether clubs are complying with the requirement
4 to make safe spaces, would it be accurate to say
5 that the most significant factor in that is
6 complaints by students who feel unsafe?
7 A. Sorry. Could you repeat
8 that?
9 138 Q. In evaluating clubs'
10 compliance with this requirement, is the most
11 significant factor complaints from students who
12 may say they feel unsafe?
13 A. No, and it is variable.
14 If an event happened and students complained that
15 there was an issue with that event, then you can
16 investigate and see what happened. If beforehand,
17 while the event is being planned and the staff
18 bring something from past experience or something
19 from their knowledge with the students that
20 something might be of concern, they can flag it
21 there, as well.
22 139 Q. Did students complain
23 about feeling unsafe at MIAS events?
24 A. MIAS at this time was not
25 an approved group, so no students complained at

1 this time before -- while the group was present to
2 the committee.
3 140 Q. Were you aware that MIAS
4 had held events prior to their application?
5 A. As a non-RSU club, I
6 believe so.
7 141 Q. Had you received any
8 complaints about the club at that point?
9 A. Yes.
10 142 Q. Were those complaints
11 brought to the attention of MIAS?
12 A. Not that I am aware of.
13 143 Q. Were those complaints
14 ever brought to the attention of MIAS?
15 A. I think during the
16 committee meeting it was discussed. Safety was
17 discussed, and those complaints from the students
18 were presented to the group, MIAS, and they had
19 that discussion.
20 144 Q. Do you recall the nature
21 of those complaints?
22 A. The nature of those
23 complaints was more so the concern for safety in
24 the future, not at those immediate events that
25 took place, and the group did not have adequate

1 presenting, saying that it is not our concern.
2 150 Q. Would you be able to
3 identify in the minutes of that committee meeting
4 what you are referencing?
5 A. If you give me a few
6 moments. Can I use your pen for a second?
7 MS. WOOD: Sure. Do you want
8 a piece of paper?
9 THE WITNESS: I can just write
10 on this. As I am still going through, page 179,
11 second-last paragraph, and up until page 180, this
12 conversation here. This is from the initial
13 student group meeting, and then there is the
14 executive meeting that I will look at right now.
15 Page 220 of the executive
16 committee. This was from the duration of the
17 student group committee until the executive
18 committee where they appealed. There were threats
19 that members of the board and staff received,
20 email and phone call, second-last paragraph at
21 page 220.
22 Then the same thing on
23 page 221. There is conversation here back and
24 forth. And I repeat Kevin saying, I can't control
25 it. It is up to the police, and in another area,

1 responses on how to combat them.
2 145 Q. What would have been an
3 adequate response?
4 A. An adequate response
5 could be saying, "Yes, we will put something in
6 our constitution to make sure this doesn't
7 happen."
8 146 Q. Did MIAS put something in
9 their constitution concerning safety?
10 A. I can't recall what the
11 constitution changes were prior to the first and
12 second meetings.
13 147 Q. What else would have been
14 an adequate response?
15 A. A commitment.
16 148 Q. A commitment how? What
17 kind of commitment?
18 A. A commitment from the
19 group saying, "We are going to take this as a
20 priority and make sure that students feel
21 inclusive within our group."
22 149 Q. Is it your understanding
23 that MIAS did not make that commitment?
24 A. There was a lack of
25 commitment from the executives at the time

1 obviously there will be people who will harass you
2 guys. I mean you all, we all, we can't control
3 that.
4 MR. MOORE:
5 151 Q. Did RSU think that Mr.
6 Arriola could control those threats?
7 A. The RSU's concern is a
8 commitment. It is not about controlling the
9 threats. It is about supporting and working with
10 each other to reach out to community members and
11 preventing these threats.
12 152 Q. Is there any specific
13 objection to that statement that you read that Mr.
14 Arriola can't control it, and it is up to the
15 police?
16 A. There is no objection.
17 153 Q. In regards to what you
18 pointed out at page 179, the second-last paragraph
19 that you pointed out, was there something specific
20 there that Kevin said that you object to?
21 A. No, I am just answering
22 your initial question of referencing you to a
23 place in the meeting minutes.
24 154 Q. Does this to you indicate
25 that he is not committed to safety, this statement

1 at the second-last paragraph?
2 MS. WOOD: It is not his
3 personal belief that is at issue. It is the
4 committee's. Yes, the committee did believe that.
5 It is not his personal view.
6 MR. MOORE:
7 155 Q. Speaking on behalf of the
8 committee and identifying this paragraph as you
9 have, on behalf of RSU, what particularly in his
10 statements here indicate, as you have alleged, a
11 lack of commitment to safety?
12 A. A response would be: I
13 will work with the group. I will work with
14 individuals, and we will try to make these events
15 safer. In this case, it is questioning why people
16 are questioning something. That is not an answer.
17 It is a question.
18 156 Q. Are you saying that Mr.
19 Arriola, by asking, I would question why this will
20 make them feel unsafe like this would make folks
21 feel unsafe, I don't know why people think that,
22 by him not understanding that? Was that the
23 problem?
24 A. The problem was the lack
25 of commitment to help safety concerns or to

1 resolve safety concerns.
2 157 Q. You also mentioned on
3 page 220, the second-last paragraph of that, if I
4 understand the second-last paragraph to be Kevin's
5 statement at the bottom of the page?
6 A. Third-last paragraph.
7 Andrea is speaking.
8 158 Q. Kevin's response to that
9 is, "Our group is concerned about safety." Does
10 RSU accept that statement?
11 MS. WOOD: By that question, I
12 presume you mean: Did the executive accept that
13 answer when it was considering this application?
14 MR. MOORE: Yes.
15 THE WITNESS: Safety was still
16 a concern, because there were no steps from the
17 group to show that they had done anything or
18 supported the safety concerns.
19 MR. MOORE:
20 159 Q. So a provision in their
21 constitution making a commitment to safety is not
22 a step supporting the promotion of safety in RSU's
23 opinion?
24 A. Could you repeat that?
25 160 Q. A provision within a

1 student group's constitution committing itself to
2 ensuring safety, is that a step promoting safety
3 in RSU's opinion?
4 A. Yes.
5 161 Q. A statement saying that a
6 group is concerned about safety, is that a
7 statement promoting ensuring safety in RSU's
8 opinion?
9 A. Yes.
10 162 Q. Mr. Arriola states that
11 he can't control the actions of non-members. Does
12 RSU expect Mr. Arriola to control the actions of
13 non-members?
14 A. No.
15 163 Q. At paragraph 46 of your
16 affidavit, you reference 12 to 15 calls
17 threatening Ms. Bartlett. Can you tell me what
18 the date of the first call was?
19 A. I don't remember.
20 164 Q. Can you tell me who made
21 that first call?
22 A. I don't know.
23 165 Q. Can you tell me what they
24 said?
25 A. I don't remember

1 specifically. I have heard some calls. I don't
2 recall all the conversations. I have never heard
3 the first conversation. I remember conversations.
4 I have heard the voice mails, but I don't know
5 which is first. I don't know the date.
6 166 Q. Do you know if there is a
7 recording of that first call?
8 A. No.
9 MS. WOOD: Counsel, I can
10 advise that we searched for them. There are no
11 recordings that we could find.
12 MR. MOORE:
13 167 Q. You indicated that you
14 had heard recordings of these calls?
15 A. Yes.
16 168 Q. How did you come to hear
17 recordings of these calls?
18 A. They were played back to
19 us by Andrea.
20 169 Q. You don't recall any
21 dates on which you would have heard these
22 recordings?
23 A. All I remember, the time
24 frame that the phone calls and emails started
25 happening after the student group had denied and

1 MIAS had filed for the appeal, so from the time
2 frame from the student committee meeting up until
3 the executive meeting. In between there is when
4 the complaints started.
5 170 Q. Do you recall how any of
6 the callers insinuated that something would happen
7 to her?
8 A. Could you clarify what
9 you mean?
10 171 Q. In your affidavit, you
11 state that the callers insinuated that if Ms.
12 Bartlett did not grant MIAS student group status,
13 something would happen to her. What do you mean
14 by that statement?
15 A. She received threats.
16 172 Q. Can you indicate the name
17 of anyone who made such calls?
18 A. No.
19 173 Q. Do you know whether any
20 of those individuals were members of MIAS?
21 A. No.
22 174 Q. Were these calls provided
23 to campus security?
24 A. I don't know.
25 175 Q. Were these calls provided

1 A. Where?
2 180 Q. The first sentence of
3 Exhibit M. It states that the group was not aware
4 that having certain speakers and events could
5 cause an unsafe learning environment. I will stop
6 there. Does that indicate that RSU is concerned
7 for a safe learning environment?
8 A. Yes.
9 181 Q. Would it be fair to say
10 that a safe learning environment is one that
11 fosters intellectual growth?
12 A. What do you mean by that?
13 182 Q. A good learning
14 environment fosters intellectual growth?
15 MS. WOOD: Are you asking his
16 personal opinion?
17 MR. MOORE: I am asking his
18 opinion on behalf of RSU.
19 MS. WOOD: You can answer
20 that, if you can.
21 THE WITNESS: I don't know how
22 to answer that.
23 MR. MOORE:
24 183 Q. In regards to a learning
25 environment, if someone attends RSU for three

1 to the police?
2 A. I don't know. Ryerson
3 University security was contacted.
4 176 Q. Did Ryerson University
5 open an investigation into these calls?
6 A. Yes.
7 177 Q. Does RSU have records of
8 that investigation?
9 A. I don't know. It is
10 protocol for them to file complaints. I am
11 assuming they investigated. I don't know if they
12 investigated or not.
13 178 Q. Counsel, could I request
14 an undertaking if there are any documents or
15 records of this complaint to be provided?
16 U/T MS. WOOD: I have already
17 asked my client, and they have said they don't
18 have any documents, but I will specifically ask
19 about a university security investigation and see
20 what documents they have for that.
21 MR. MOORE:
22 179 Q. Ryerson Students' Union
23 indicates that it is concerned for the learning
24 environment. Is that correct? In Exhibit M, it
25 indicates a concern for the learning environment?

1 years or four years and they leave exactly the
2 same, they haven't grown intellectually. Would
3 that be considered a good learning environment?
4 A. Can you rephrase that
5 question?
6 184 Q. Would RSU consider a good
7 learning environment to be a learning environment
8 that causes a person to grow intellectually?
9 A. That is something I can
10 take back to the board and have them discuss, but
11 we have never used that metric, specific scenario,
12 with one person.
13 185 Q. Would RSU view having new
14 ideas being part of a good learning environment?
15 A. Same answer as the last
16 one.
17 186 Q. If a person is challenged
18 by a new idea, does that make the learning
19 environment unsafe?
20 A. Can you rephrase that
21 question?
22 187 Q. Do you not understand the
23 question?
24 A. No.
25 188 Q. If a person feels

1 challenged by facing a new idea, does that make
2 that learning environment unsafe?
3 A. No.
4 189 Q. If a person feels
5 offended by facing a new idea, does that make that
6 learning environment unsafe?
7 A. It can lead to scenarios
8 where students can feel unsafe.
9 190 Q. Does that mean that
10 offensive ideas need to be curtailed in order to
11 make a learning environment safe?
12 A. What do you mean by
13 curtailed?
14 191 Q. If an idea is offensive
15 to people and it makes them feel unsafe, does that
16 mean that causes an unsafe learning environment?
17 A. Can you repeat that one
18 more time?
19 192 Q. If an idea causes people
20 to feel unsafe, does that mean that creates an
21 unsafe learning environment?
22 A. What do you mean by the
23 idea? That is what I don't get.
24 193 Q. If an idea is presented
25 at Ryerson University that causes some students to

1 197 Q. Does a statement have to
2 violate the Human Rights Code, the RSU policies or
3 the university policies in order to be found to
4 make an environment unsafe?
5 A. Sorry. Could you repeat
6 that question?
7 198 Q. Does an idea or statement
8 have to violate the Ontario Human Rights Code, the
9 RSU policies or the Ryerson University policies in
10 order to justify a student feeling unsafe?
11 A. I will answer your
12 question asking about the objective. You asked me
13 to direct you to where the objective policies
14 were. Those are the ones I mentioned. To answer
15 your question again, for objective safety
16 measures, you would be violating one of those
17 policies.
18 199 Q. Can you create an unsafe
19 learning environment without violating one of
20 those policies, either the Ontario Human Rights
21 Code, the RSU policies or the Ryerson University
22 policies?
23 A. I have already answered
24 that question.
25 200 Q. No, you haven't.

1 feel unsafe, does that make an unsafe learning
2 environment?
3 A. Yes.
4 194 Q. Is there objective
5 criteria to determine whether a person feels
6 unsafe, or is it entirely subjective, based on the
7 person?
8 MS. WOOD: I think you have
9 been through this. He said it is when they get
10 complaints. You have been down this road already.
11 MR. MOORE: This is a
12 different question, counsel.
13 THE WITNESS: Could you repeat
14 the question?
15 MR. MOORE:
16 195 Q. Sure. Are there
17 objective criteria to determine whether a person
18 feels unsafe, or is it subjective, based on that
19 person's individual feelings?
20 A. There is both.
21 196 Q. Could you tell me what
22 those objective criteria are?
23 A. As mentioned in policy
24 36, 36.2, it is the Ontario Human Rights Code's,
25 RSU's policies, and Ryerson University's policies.

1 A. Can you repeat the
2 question one more time?
3 201 Q. Can you create an unsafe
4 learning environment without violating the Ontario
5 Human Rights Code, the RSU policies or the Ryerson
6 University policies?
7 A. Subjectively or
8 objectively?
9 202 Q. Under the definition of
10 RSU.
11 A. You asked me earlier
12 objective or subjective. Are you asking me for
13 safety or are you asking for objective or
14 subjective safety?
15 203 Q. I am asking for an
16 understanding of what RSU means by saying unsafe
17 learning environment. I am asking how a student
18 group or speaker can create an unsafe learning
19 environment.
20 My question is: Can you create
21 an unsafe learning environment in the perspective
22 of RSU without violating the Ontario Human Rights
23 Code, the RSU policies or Ryerson University
24 policies?
25 A. It is possible.

1 204 Q. Even if a speaker or
2 student group complies with RSU policies, Ryerson
3 University policies, and the Ontario Human Rights
4 Code, they can still potentially create an unsafe
5 learning environment in the perspective of RSU?
6 A. Possibly, yes.
7 205 Q. You indicate that --
8 scratch that, or strike that, I should say.
9 In paragraph 2 of the committee
10 concerns document, a concern is referenced that
11 the MIAS group would, quote, spin out of control.
12 What does it mean that the
13 group would spin out of control? Could you tell
14 me what that is referencing or what concern that
15 is referencing?
16 A. It means that the group
17 would down the road head in a direction where they
18 would not follow policies and procedures.
19 206 Q. What indications did MIAS
20 give you that they would not follow policies and
21 procedures down the road?
22 A. In the initial student
23 group meeting that took place, they had a few
24 executives, as mentioned in the meeting minutes,
25 and the matters of the constitution.

1 possibility of doing it certain ways. There is a
2 possibility of having -- it depends on each group
3 and how they set up their constitution.
4 211 Q. Did RSU indicate to MIAS
5 what specific processes they wanted MIAS to enact
6 in its constitution?
7 A. I don't think so.
8 212 Q. Was there a reason that
9 was not brought up to MIAS?
10 A. I don't know. No.
11 213 Q. Could you provide what
12 those processes are? Could you tell me what those
13 processes are that RSU would require in order for
14 a constitution not to be as changeable as you say
15 MIAS's constitution is?
16 A. They are hypotheticals.
17 No. I don't know specifically what can be done
18 with the MIAS constitution unless I go through it
19 right now.
20 214 Q. If you want to provide an
21 undertaking as to what specific --
22 MS. WOOD: We are not
23 providing ad hoc reasons after this is over. You
24 have the reasons. You are asking us to provide
25 additional supplementary reasons, and that is

1 207 Q. When the constitution was
2 changed, did that indicate to RSU that MIAS would
3 follow RSU policies?
4 A. At the executive meeting,
5 I believe there was more commitment from a
6 constitution perspective, but from what I recall
7 from my memory from this meeting, the way the
8 constitution was presented, that it was easily
9 changeable, you could have members come in, change
10 the constitution, and then just head in a
11 different direction next year onwards, so there
12 was no commitment for long-term longevity.
13 208 Q. Are student groups'
14 constitutions changeable?
15 A. Yes.
16 209 Q. Are all student groups'
17 constitutions changeable?
18 A. Yes.
19 210 Q. Can a particular
20 executive of a student group ensure or guarantee
21 that its constitution won't be changed after those
22 particular members leave?
23 A. To an extent. Every
24 group has different processes in the constitution
25 of how they set up new executives. There is a

1 improper.
2 MR. MOORE:
3 215 Q. You don't recall any
4 specific provisions that RSU wanted to see in
5 MIAS's constitution in regards to processes to
6 prevent future amendments?
7 A. It is again going back to
8 the overall picture. In these committee meetings,
9 we don't hammer out every single narrow
10 possibility. It is the overall picture. Again,
11 the groups respond to us saying there is a lack of
12 commitment from the group that will work towards
13 making sure their constitution is better and their
14 longevity is better. There was no reassurance
15 from the group. It was more: We can't do
16 anything about it. That's it.
17 216 Q. Did MIAS indicate a lack
18 of commitment to changing the constitution?
19 A. No. They changed their
20 constitution from the first meeting to the second
21 meeting.
22 217 Q. Did they indicate a lack
23 of commitment to further changing their
24 constitution as required by RSU?
25 A. No.

1 218 Q. The third paragraph of
2 the committee concerns document states that MIAS
3 neglected to have an assessment on the possible
4 harm to the community.
5 Are all student groups required
6 to have a, quote, assessment on the possible harm
7 to the community?
8 A. No.
9 219 Q. Was MIAS told that it had
10 to have a, quote, assessment on the possible harm
11 to the community?
12 A. No.
13 220 Q. How was MIAS supposed to
14 know that they were supposed to have a, quote,
15 assessment on the possible harm to the community?
16 MS. WOOD: He can't know what
17 MIAS knew or didn't know.
18 MR. MOORE: I asked an
19 objective question.
20 221 Q. In RSU's opinion, how was
21 MIAS supposed to know that they were supposed to
22 have an assessment on the possible harm to the
23 community?
24 A. Can you repeat that one
25 more time? Sorry. I was just reading.

1 222 Q. Sure. In RSU's opinion,
2 how was MIAS supposed to know that they were
3 supposed to have a, quote, assessment on the
4 possible harm to the community?
5 A. MIAS had no response to
6 it at the meeting. When we brought up the
7 students' concerns, they had no response to it.
8 They had no response to the safety.
9 223 Q. Is there a specific
10 assessment form that MIAS was supposed to
11 complete?
12 A. No.
13 224 Q. Did RSU indicate to MIAS
14 what a, quote, assessment would be?
15 A. I think the
16 acknowledgment of the safety was a big step.
17 There was no acknowledgment from the group to
18 address safety concerns at the initial meeting.
19 225 Q. Does the acknowledgment
20 that safety was a concern for MIAS at the
21 executive meeting factor into RSU's
22 considerations?
23 MS. WOOD: These reasons were
24 written before the executive committee meeting, so
25 that is an impossible question.

1 MR. MOORE: I am not talking
2 about this now. I am moving on.
3 THE WITNESS: Could you repeat
4 the question?
5 MR. MOORE:
6 226 Q. The acknowledgment of
7 MIAS to RSU that safety was a concern, does that
8 constitute --
9 MS. WOOD: Counsel, your
10 question twists the facts. Yes, there is a
11 statement in there that says safety is a concern,
12 but my client has already repeatedly told you that
13 both at the committee level and the executive
14 committee level, they didn't feel that MIAS was
15 taking safety seriously.
16 We have been over that ground
17 repeatedly. Yes, you have identified one sentence
18 that Kevin said, but my client has given you the
19 RSU's position both at the committee level and the
20 executive committee level. These questions are
21 getting tedious.
22 MR. MOORE: Thank you,
23 counsel.
24 227 Q. Was the admission --
25 strike that, please.

1 Was Mr. Arriola's statement
2 that safety was a concern for MIAS at the
3 executive meeting not sufficient for RSU to view
4 that safety was a concern for MIAS?
5 A. I will go over the
6 meeting minutes. Can you repeat your question?
7 228 Q. Was Mr. Arriola's
8 statement to the RSU executive that safety was a
9 concern for MIAS sufficient?
10 A. No.
11 229 Q. The change in the
12 constitution emphasizing safety by MIAS was not
13 sufficient either?
14 A. Could you repeat that
15 question?
16 230 Q. MIAS's change in its
17 constitution emphasizing safety was not sufficient
18 either for RSU. Correct?
19 A. It was taken as a sign of
20 commitment from the group.
21 231 Q. But together with the
22 oral affirmation of its commitment to safety, that
23 was not sufficient. Correct?
24 A. Yes.
25 232 Q. What further commitments

1 to safety did RSU expect MIAS to make?
2 A. There were no actions on
3 how the issues would be prevented, with the
4 threats, the phone calls, the emails. There was
5 no support from the group and no willingness to
6 work, and as mentioned on page 221, it was more
7 seen as community concerns, rather than
8 harassment.
9 233 Q. What actions did RSU
10 expect MIAS to take?
11 MS. WOOD: He just answered
12 that question. That is exactly what he just
13 answered.
14 MR. MOORE: He answered and
15 said that there were not actions taken by MIAS. I
16 am now asking: What actions are those?
17 MS. WOOD: What? You are
18 asking what actions MIAS didn't take?
19 MR. MOORE: He stated that
20 MIAS did not take actions to address this, and the
21 second part of the answer was that they viewed
22 this as a community concern, rather than
23 harassment.
24 234 Q. In regards to that first
25 part of the answer, what are the actions that RSU

1 wanted to see MIAS take?
2 A. For MIAS to say: Yes,
3 this is harassment. We will work with you, and we
4 will reach out to these people and ask them to
5 stop. Can I have a break?
6 MS. WOOD: Absolutely. I
7 think we need a break.
8 --- Recess taken at 1:49 p.m.
9 --- Upon resuming at 2:01 p.m.
10 MS. WOOD: Before we start, I
11 would just like to say that we are here on our own
12 volition today. We are here voluntarily. No
13 notice of exam was ever served. I expect that
14 counsel will be done by 5 p.m., at which time we
15 are leaving, and we are not coming back unless
16 counsel pays for it.
17 You have asked the same
18 question repeatedly. I ask that you please move
19 on and start asking questions that are dealing
20 with a different area. My client has been
21 incredibly gracious with this, but this is getting
22 tedious.
23 MR. MOORE: Thank you,
24 counsel. I certainly aim to get done this
25 examination by 5, and I appreciate the agreement

1 that we have had to have the questioning today and
2 the expense that we have expended to be here, as
3 well. I certainly hope that the questioning
4 proceeds and that we properly flesh out the issues
5 in this case, so I will continue.
6 235 Q. Before the break, Mr.
7 Ullah, we had a question concerning what actions
8 RSU wanted MIAS to take. You specifically
9 mentioned two. You mentioned two. You mentioned
10 that you wanted MIAS to acknowledge harassment.
11 Is that correct?
12 A. As stated in the meeting
13 minutes by Kevin himself, yes.
14 236 Q. You also wanted MIAS to
15 reach out to the people who were threatening or
16 allegedly making these threatening phone calls?
17 A. That is also -- strike
18 that. It is dependable.
19 237 Q. Is that what you stated?
20 A. Yes.
21 238 Q. In regards to the first
22 part of your answer, on page 221, do you view that
23 answer that Kevin gave there and the statement
24 that Kevin gave there as denying that there was
25 harassment going on?

1 A. Which answer that Kevin
2 gave?
3 239 Q. The first paragraph on
4 page 221. Do you believe that Kevin was denying
5 that there was any harassment going on?
6 MS. WOOD: His personal belief
7 is irrelevant.
8 MR. MOORE:
9 240 Q. Stating in your capacity
10 as a decision maker with RSU and stating that RSU
11 wanted Kevin to acknowledge harassment --
12 MS. WOOD: Mr. Ullah has
13 stated repeatedly that at the end of the day, both
14 the student groups committee and the executive
15 were of the belief that the MIAS group was not
16 taking safety concerns seriously. He has said
17 that about seven different ways in response to
18 your same questions. Move on.
19 MR. MOORE: Counsel, you have
20 stated that, as well. The reason for our
21 questioning is to actually understand what is
22 behind a pat answer.
23 MS. WOOD: It is not a pat
24 answer. He has given you examples. You have been
25 over and over and over this. Move on. Also, this

1 is a cross-exam. It is a very different thing.
2 It is more narrow and more targeted. Your
3 questions are broad-reaching fishing expeditions.
4 MR. MOORE: We are seeking to
5 understand the statements made by RSU --
6 MS. WOOD: He has explained
7 them.
8 MR. MOORE: -- in its own
9 documents, and you are thwarting that right now.
10 MS. WOOD: No, I am not. He
11 has explained them repeatedly.
12 MR. MOORE:
13 241 Q. When Kevin stated,
14 "Obviously there will be people who harass you
15 guys," does that constitute an acknowledgment that
16 there was potential harassment?
17 A. Sorry?
18 242 Q. On page 221, Kevin
19 states, "Obviously there will be people who will
20 harass you guys." Is that not an acknowledgment
21 of harassment?
22 A. That is a statement made
23 by Kevin that there will be people who will harass
24 you guys.
25 243 Q. Did Kevin need to go

1 requirement.
2 MR. MOORE: Counsel, you are
3 reinterpreting his answers. I am following up on
4 his answers.
5 MS. WOOD: You said it was a
6 requirement. He never said that. You asked him
7 for examples of what may possibly have been done
8 at some point. He gave them to you.
9 MR. MOORE:
10 248 Q. In regards to RSU's
11 desire that Kevin reach out to the people who were
12 allegedly threatening Ms. Bartlett --
13 MS. WOOD: I still object to
14 that characterization because you asked him
15 sitting here today what maybe could have
16 additionally been done. I am going to object to
17 that question, the phrasing of it, but you can
18 continue.
19 MR. MOORE:
20 249 Q. In regards to RSU's
21 stated desire on the record today, as it was
22 stated, to reach out to those people who were
23 threatening Andrea, allegedly, did you require
24 that Kevin or someone within MIAS email or seek to
25 talk to people who were threatening the safety of

1 further in acknowledging harassment as a
2 possibility?
3 A. Sorry. Can you repeat
4 that question?
5 244 Q. You stated that RSU
6 wanted Kevin to acknowledge harassment?
7 A. Yes.
8 245 Q. Was that statement not
9 sufficient to acknowledge harassment?
10 A. That statement is saying
11 that there will be people who will harass you
12 guys, not acknowledging that people harassed you
13 for this case.
14 246 Q. Had you provided Kevin
15 with transcripts of the threatening phone calls
16 that you alleged to have happened?
17 A. No.
18 247 Q. In regards to RSU's
19 requirement that Kevin reach out to those people
20 who were threatening --
21 MS. WOOD: It was not a
22 requirement, counsel. Do not misstate that. You
23 asked him for hypotheticals. He gave you some
24 hypothetical answers off the top of his head, and
25 now you are trying to say that that was a

1 other individuals?
2 A. As in, was it a
3 requirement for the group to be approved?
4 250 Q. Yes.
5 A. No.
6 251 Q. Turning your attention to
7 Exhibit T -- sorry. Let's get on the same page
8 here. It is Exhibit S in the application record,
9 Exhibit S in the RSU's application record. There
10 is a clause that states second to last on the
11 bottom of the page, "Whereas the student groups
12 committee resolved to deny student group status
13 based on concerns regarding the ability to create
14 safer spaces on campus," did RSU have concerns
15 that it could create safer spaces on campus? Was
16 that what that whereas clause is referencing?
17 A. I don't understand the
18 question.
19 252 Q. Was RSU concerned that
20 RSU lacked the ability to create safer spaces on
21 campus in this context?
22 MS. WOOD: You are asking
23 whether that clause references RSU?
24 MR. MOORE: Correct.
25 THE WITNESS: No, it was

1 referencing the student group, the group MIAS.
 2 MR. MOORE:
 3 253 Q. The student groups
 4 resolved to deny student group status based on the
 5 concerns regarding the ability of MIAS to create
 6 safer spaces on campus?
 7 A. Yes.
 8 254 Q. Is that what this is
 9 stating? Is it MIAS's responsibility to create
 10 safer spaces on campus?
 11 A. It is every group's
 12 responsibility to create a safe space on campus
 13 for their respective constituents.
 14 255 Q. You are stating that as
 15 an executive of RSU or are you stating that based
 16 on a particular policy?
 17 A. As an executive of the
 18 RSU and operational policy 36, 36.2.
 19 256 Q. We have been over this
 20 question before, but can you point to anything in
 21 36.2 that addresses safety specifically on
 22 page 137?
 23 A. Same answer as I answered
 24 earlier.
 25 257 Q. There are no other

1 policies that support that assertion, to your
 2 knowledge?
 3 A. Yes.
 4 258 Q. Can you identify an RSU
 5 policy that requires student groups not to have
 6 associations with other organizations?
 7 A. I can go through the
 8 policy manual and double check.
 9 259 Q. This is in specific
 10 reference to issue 2 noted on the document at
 11 Exhibit M.
 12 MS. WOOD: Counsel, we can
 13 just cut this off. There isn't one. Okay?
 14 Answered. We are done. There isn't one. There
 15 is no explicit policy that says there cannot be an
 16 association with an outside group.
 17 THE WITNESS: I can elaborate
 18 a little bit more for you. As an executive of the
 19 RSU, in our executive portfolios, our student
 20 groups are defined as groups that have no -- or
 21 some association with other groups, and they act
 22 as independent entities on campus.
 23 Our affiliate groups are a
 24 branch of student groups that can have an
 25 affiliation and are chapter organizations of other

1 groups. If MIAS were to start an affiliate group
 2 under CAFE at Ryerson, they can apply through
 3 that.
 4 MR. MOORE:
 5 260 Q. To understand that, is
 6 there a particular policy that sets out what you
 7 have just stated?
 8 A. No, not a written policy.
 9 261 Q. Has that policy been made
 10 clear to MIAS before?
 11 A. I believe so.
 12 262 Q. Is that in the minutes of
 13 any of the meetings?
 14 A. As stated in Exhibit M,
 15 no groups are allowed to have
 16 external organizations. Referencing back to what
 17 you referenced, it is in there.
 18 263 Q. Can I direct your
 19 attention to Mr. Arriola's affidavit at Exhibit B.
 20 Several pages from the back of that exhibit, there
 21 is a particular page that references Youth With a
 22 Mission as a registered club.
 23 Is Youth With a Mission a
 24 registered club at Ryerson under the Ryerson
 25 Students' Union?

1 A. I don't have the list of
 2 registered clubs memorized or with me in front of
 3 me, but if it is on our web site, it should be.
 4 264 Q. Are you aware that Youth
 5 With a Mission is also an external organization?
 6 A. No.
 7 265 Q. Are you aware of any
 8 other clubs registered with RSU that are also
 9 connected to external organizations?
 10 A. As student groups, no.
 11 266 Q. Are you aware of Ryerson
 12 Power to Change?
 13 A. I have heard of that name
 14 before.
 15 267 Q. Are you aware that Power
 16 to Change is an external organization, as well?
 17 A. No, but if these groups
 18 have been approved, it is because they are working
 19 separately from their chapters or have no direct
 20 affiliation with their groups.
 21 268 Q. What in the relationship
 22 between MIAS and CAFE constituted the prohibited
 23 direct affiliation?
 24 A. What do you mean by that?
 25 269 Q. You have stated that if

1 these organizations do not have a direct
2 affiliation, that is acceptable for student
3 groups?
4 A. Have an affiliation, not
5 direct.
6 270 Q. What constitutes the
7 prohibited affiliation with external groups?
8 A. If an external group is
9 funding a group or managing a group, that is what
10 it means by affiliation.
11 271 Q. In RSU's opinion, was
12 CAFE having that affiliation with MIAS?
13 A. Kevin stated that he was
14 working with CAFE and he had help from CAFE to
15 start up the group.
16 272 Q. Was that sufficient to
17 constitute the prohibited affiliation?
18 A. Yes.
19 273 Q. If RSU found this
20 prohibited affiliation with any other student
21 groups, would those student groups lose their
22 recognition?
23 REF MS. WOOD: Don't answer that.
24 It is hypothetical, and those other groups aren't
25 at issue.

1 MR. MOORE:
2 274 Q. MIAS made a change to its
3 constitution in referencing external
4 organizations. Was that change to its
5 constitution --
6 A. Sorry. Could you repeat
7 the question?
8 275 Q. Sure. MIAS made a change
9 in its constitution in reference to external
10 organizations. Did that change to MIAS's
11 constitution rectify any prohibited affiliation
12 that MIAS had or may have had with an external
13 organization?
14 A. The concern remained
15 because those threats allegedly came from a CAFE
16 newsletter. Members heard what was going on
17 through a CAFE newsletter. Despite the
18 constitution's change, there were still
19 affiliations and allegations that the groups were
20 working hand in hand.
21 276 Q. Were any of the
22 allegations that MIAS and CAFE were working hand
23 in hand verified by evidence?
24 MS. WOOD: Beyond what he just
25 said? He just said that the threats came from

1 people who identified a CAFE newsletter.
2 MR. MOORE: Sure.
3 277 Q. Beyond that, do you have
4 any other evidence that CAFE and MIAS were working
5 together, other than that threats were made,
6 allegedly, on the basis of a CAFE newsletter?
7 MS. WOOD: Again, my client
8 has also said -- your client, Mr. Arriola, already
9 said he was working with CAFE. He said that at
10 the very beginning of his answer.
11 MR. MOORE: Counsel,
12 subsequent to that alleged working with CAFE, MIAS
13 changed its constitution, and now we are dealing
14 with after that, in regards to after that.
15 278 Q. The only evidence that
16 RSU had that MIAS was working with CAFE are these
17 alleged threats? Is that what I am correct to
18 assume?
19 A. Could you specify a
20 specific meeting that you want to talk about and a
21 specific point? I am just hearing different
22 points, and I don't know what to answer.
23 279 Q. MIAS changed its
24 constitution in regards to external organizations?
25 A. Which point in time are

1 we discussing?
2 280 Q. When MIAS changed its
3 constitution, I am talking about after that period
4 of time. There is one constitution change that I
5 am aware of.
6 A. Meaning after the
7 October 29 meeting?
8 281 Q. Yes. What evidence does
9 RSU have that MIAS was violating the prohibition
10 on being affiliated with an external organization?
11 A. You are asking for
12 evidence that CAFE was associated with MIAS?
13 282 Q. Yes.
14 A. We don't have the
15 newsletter because we are not subscribed to it.
16 We just received those threats.
17 283 Q. It is based on the
18 allegations that these threats came based on a
19 CAFE newsletter?
20 A. That is one of the
21 points.
22 284 Q. Are there any other
23 points?
24 A. Kevin admitting that he
25 had help from CAFE initially.

1 285 Q. Is there anything else?
2 A. If there is anything that
3 I cannot recall right now, it is stated in these
4 documents in front of us.
5 286 Q. After MIAS changed its
6 constitution, did RSU bring to MIAS's attention
7 RSU's belief that MIAS still had a prohibited
8 affiliation with CAFE?
9 A. It has been mentioned
10 before in these documents, as well.
11 287 Q. So not otherwise than
12 what is mentioned in the documents?
13 A. Everything that happened
14 is mentioned in these documents.
15 288 Q. I am asking you questions
16 about these documents, though.
17 A. I can open up the
18 documents.
19 MS. WOOD: If you want to take
20 him to a specific document, that is fine, but he
21 hasn't committed every single piece of paper to
22 memory. If you want to take him to something,
23 great. He said that if it happened, it is in the
24 documents.
25 MR. MOORE:

1 289 Q. You are not aware in your
2 recollection that MIAS was notified by RSU after
3 it had changed its constitution that MIAS still
4 had a prohibited affiliation with CAFE?
5 MS. WOOD: That is an unfair
6 characterization. He said that if it happened, it
7 is in the documents.
8 THE WITNESS: I can go over it
9 and revise everything if you like.
10 MR. MOORE: It is up to you
11 whether you want to do that or not.
12 MS. WOOD: If you want to
13 waste the time having him read through all of the
14 documents, we will do that. This is your
15 cross-exam. Take him to a document. Put it in
16 front of him. He has said that if it happened, it
17 is in the documents.
18 MR. MOORE: I am testing the
19 knowledge of the affiant of the documents that he
20 swore to.
21 MS. WOOD: No, you are asking
22 for a memory test. He has said that if it
23 happened, it is in the documents.
24 MR. MOORE: My question is
25 further to that.

1 MS. WOOD: Which is?
2 MR. MOORE:
3 290 Q. Further to what is
4 included in the documents, are you aware of any
5 time that MIAS was notified by RSU that it still
6 had a prohibited affiliation with CAFE after it
7 had changed its constitution?
8 A. Are you asking me if
9 there is extra information that is not provided in
10 this document?
11 291 Q. Right.
12 A. No.
13 292 Q. I am going to direct your
14 attention to Exhibit M and point 3. The first
15 sentence of that point states, "It was not clear
16 whether the acknowledgment of the systemic
17 privilege that men have would be made at any event
18 or from this group."
19 Could you address what RSU
20 means by stating "systemic privilege that men
21 have"?
22 A. Could you repeat your
23 question?
24 293 Q. Could you address what
25 RSU means by stating "the systemic privilege that

1 men have"?
2 A. Yes, to an extent.
3 294 Q. What is that?
4 A. That men have a systemic
5 privilege.
6 295 Q. What does it mean by
7 systemic?
8 A. It means that the way
9 that the system of society is right now, that men
10 have more of a privilege than women.
11 296 Q. What do you mean by
12 privilege?
13 A. Privilege meaning there
14 are things that come a lot easier to you than
15 others.
16 297 Q. Could you elaborate on
17 that?
18 A. Not accurately. Not the
19 best teacher, but I can give it a try.
20 298 Q. Okay.
21 A. It means that men
22 naturally in society have more opportunities.
23 They are looked up to. They are looked at in a
24 certain way. They are expected to be in a certain
25 way. They have more of an advantage over women.

1 299 Q. Is there anything else
2 that would go into your definition of what
3 systemic --
4 MS. WOOD: He is providing his
5 own personal definition. I just want to be clear
6 about that. It is in the policies. There are
7 other issues like that. You are putting him on
8 the spot to describe a pretty complicated process
9 that is in the policies. He is doing his best,
10 but I don't think it is fair to say, "Is there
11 anything else" and narrow him like that. He has
12 already said that he is not the best teacher for
13 this.
14 MR. MOORE:
15 300 Q. Under this point 3, was
16 RSU requiring MIAS to correctly acknowledge
17 systemic male privilege?
18 A. Yes.
19 301 Q. How would MIAS correctly
20 acknowledge systemic male privilege?
21 A. By acknowledging systemic
22 privilege.
23 302 Q. Must every student group
24 acknowledge that there is systemic male privilege
25 in order to exist?

1 question or not. There is a possibility to it,
2 and there is not a possibility to it. But there
3 is no formal procedure that this question is asked
4 on the list of 10 questions that we ask to every
5 student group.
6 306 Q. Are you aware that
7 certain religious groups do not admit women to
8 positions of leadership?
9 A. No.
10 307 Q. Do you know if the
11 Christian, Jewish, and Muslim clubs on campus
12 acknowledge male privilege?
13 A. No.
14 308 Q. If those clubs do not
15 acknowledge male privilege, are they violating RSU
16 policies?
17 A. Yes.
18 309 Q. Which RSU policy requires
19 that student groups acknowledge systemic male
20 privilege?
21 A. I don't know off the top
22 of my head, but I will double check. Can you
23 repeat that question, please?
24 310 Q. Which RSU policy requires
25 that student groups acknowledge systemic male

1 A. They have to abide by the
2 RSU policies.
3 303 Q. And to abide by the RSU
4 policies, must a student group acknowledge that
5 systemic male privilege exists?
6 A. The RSU believes that
7 systemic privilege exists, and it is in place
8 within our equity sessions that we have for our
9 student groups. It is in place with our -- in our
10 portfolios. We have different equity service
11 centres for this, so yes.
12 304 Q. So yes, a student group
13 must acknowledge that systemic male privilege
14 exists in order to not violate RSU policies?
15 A. They have to acknowledge
16 it, yes.
17 305 Q. Have you specifically
18 asked other student groups if they acknowledge
19 systemic male privilege?
20 A. I can't speak to that, if
21 there have been cases in the past where student
22 groups have come forward and such questions have
23 arisen. I hope the committee has asked. That is
24 a hypothetical question. I don't know every
25 single student group, if they have been asked that

1 privilege?
2 MS. WOOD: I think that is a
3 bit of an inaccurate phraseology, counsel. Which
4 RSU policy states that that is a policy of the
5 RSU, and as my client has repeatedly said, all
6 student groups are required to abide by RSU
7 policies. There isn't a specific policy that says
8 all student groups must do A, B, C, D, E, F, G.
9 There is a blanket statement that says student
10 groups have to abide by the policies, and then we
11 can take you to the various policies.
12 MR. MOORE: Counsel, your
13 client is the one giving the answers on this
14 question.
15 MS. WOOD: I am correcting
16 your phraseology, which I am entitled to do.
17 MR. MOORE: If my phraseology
18 is wrong, you are entitled to correct my
19 phraseology.
20 311 Q. Have you been able to
21 identify a policy?
22 A. Yes.
23 312 Q. Which policy have you
24 identified?
25 A. Policy number 15,

1 page 100, the policy on women's issues. This
2 policy was put in place because the RSU identified
3 systemic privilege.
4 313 Q. Is there anything in this
5 policy that requires that student groups
6 acknowledge systemic male privilege?
7 A. Could you repeat the
8 question?
9 314 Q. Is there anything in this
10 policy that you have cited here at page 100 that
11 requires RSU student groups to acknowledge
12 systemic male privilege?
13 A. This policy acknowledges
14 that the privilege exists, so that is, there is a
15 policy made for women's issues. Does that make
16 sense?
17 315 Q. If I can understand this,
18 RSU acknowledges that systemic male privilege
19 exists. Correct?
20 A. Yes.
21 316 Q. And since RSU
22 acknowledges that systemic male privilege exists,
23 does it follow, then, that RSU student groups must
24 acknowledge that systemic male privilege exists?
25 A. Yes.

1 317 Q. I would like to direct
2 your attention to your affidavit sworn January 16,
3 2017. This affidavit attaches a document entitled
4 Policy on New Student Groups. At paragraph 5 of
5 this affidavit, it states that the new student
6 group document embodies the principles contained
7 in the RSU policy manual. It does not --
8 A. Sorry. Which paragraph?
9 318 Q. I am sorry. Paragraph 5
10 of the affidavit.
11 MS. WOOD: You directed us to
12 the document itself, Policy on New Student Groups.
13 We were reading that paragraph 5. You actually
14 want the affidavit.
15 MR. MOORE: Yes, I do mean the
16 affidavit.
17 319 Q. Paragraph 5 of the
18 affidavit states:
19 "The new student group
20 document embodies the
21 principles contained in
22 the RSU policy manual. It
23 does not supersede the RSU
24 policy manual."
25 Did I read that correctly?

1 A. Can you read it one more
2 time?
3 320 Q. Sure:
4 "The new student group
5 document embodies the
6 principles contained in
7 the RSU policy manual. It
8 does not supersede the RSU
9 policy manual."
10 Did I read that correctly?
11 A. Yes.
12 321 Q. The document attached to
13 this affidavit is not part of the RSU policy
14 manual, is it?
15 A. No.
16 322 Q. Is this document publicly
17 available on RSU's web page?
18 A. On the web site? I don't
19 know. I don't think it is, but that is because
20 right now also we just made a new web site. I
21 don't know if it is on that or not.
22 323 Q. Who created this policy
23 on new student groups?
24 A. I don't know.
25 324 Q. Do you know when it was

1 created?
2 A. No.
3 325 Q. Do you know whether this
4 policy on new student groups was approved by the
5 board of directors?
6 A. This student group
7 policy?
8 326 Q. Yes.
9 A. It should have been.
10 327 Q. Could I request an
11 undertaking to determine whether this policy on
12 new student groups was approved by the board of
13 directors? This particular document?
14 U/T MS. WOOD: I will undertake to
15 find out the history of this document within
16 reasonable efforts.
17 THE WITNESS: I can shed a
18 little bit more light. I think the way that this
19 policy works is that either the VP student life or
20 campus groups coordinator will bring forward a few
21 recommendations about what to include, and that
22 gets approved at the executive committee and then
23 ratified at the board level.
24 It has been around at least
25 since when we have had student groups, dating back

1 probably to 1967, maybe the 1990s. I don't know
2 that much history about the RSU. Even with an
3 undertaking, I don't know how much records we
4 have.

5 U/T MS. WOOD: That is why I am
6 saying within reasonable efforts. It is pretty
7 hard to track down some of the old board
8 resolutions. I don't know the history of this
9 document, but I will track down what I can within
10 reasonable efforts.

11 MR. MOORE: Thank you for
12 doing that.

13 328 Q. At paragraph 6 of the
14 policy on new student groups, it states that
15 social, political issue or nonacademic special
16 interest groups may be formed and subsequently
17 recognized by RSU if the student group can prove
18 its viability and can act in accordance with RSU
19 and university criteria, policies, and procedures.

20 What does it mean for a student
21 group to prove its, quote, viability?

22 A. It means that if the
23 group can prove that there is a need for the
24 group. For example, the RSU may be working on a
25 specific issue already through the equity service

1 centres that may be a social issue. If the equity
2 service centre already exists, there is no need to
3 have a student group.

4 Another example is nonacademic
5 special interest groups, so attached to the same
6 agenda, LOL at Ryerson. LOL at Ryerson was a
7 League of Legends group. That group also got
8 denied because they wanted to be an e-sport, and
9 the RSU does not encompass athletic groups like
10 that. We don't manage athletic groups, so we
11 denied their group status, as well, because they
12 were not viable, and we referred them to the
13 athletics department.

14 MS. WOOD: Just for your
15 information, counsel, that is included in the same
16 committee group meeting as MIAS's committee group
17 meeting.

18 MR. MOORE: Yes, I have read
19 those minutes, as well. Thank you.

20 329 Q. Is it RSU's position that
21 MIAS failed to prove its viability?

22 A. Yes.

23 330 Q. How did MIAS fail to
24 prove its viability?

25 A. Viability entails a lot

1 of other factors. Committee, they are back in
2 section M of the affidavit. Those concerns were
3 not met, and because those concerns were not met,
4 MIAS could not be a viable group.

5 331 Q. Are there any other RSU
6 policies that reference the requirement of a
7 student group being viable?

8 A. It is either in the
9 policy manual, it is either in this document.
10 Outside of these, there are no other policies.

11 332 Q. As you sit here right
12 now, you can't point us to another provision that
13 requires that a student group be, quote, viable
14 or, unquote, viable?

15 A. Could you repeat that
16 question?

17 333 Q. On your recollection here
18 today, are you aware of any other policies other
19 than this policy on new student groups, section 6,
20 which require a student group to prove its
21 viability?

22 A. For what?

23 334 Q. In order to become a
24 recognized student group?

25 A. I don't understand.

1 Sorry.

2 335 Q. Under section 6 of this
3 policy on new student groups, there is a
4 requirement for a student group to prove its
5 viability?

6 A. And can act in accordance
7 with RSU and university criteria, policies, and
8 procedures.

9 336 Q. In specific regards to
10 proving its viability, are there any other RSU
11 policies in the policy manual that require a
12 student group to prove its viability?

13 A. No.

14 337 Q. I would like to take a
15 break from questioning for maybe 15 minutes.

16 --- Recess taken at 2:44 p.m.

17 --- Upon resuming at 3:01 p.m.

18 MR. MOORE:

19 338 Q. I would like to ask a
20 more specific question following up on a previous
21 question. This is: How does a group specifically
22 acknowledge systemic male privilege? You have
23 stated previously that a group needs to
24 acknowledge male privilege, but how does a group
25 need to acknowledge male privilege in order to

1 comply with that?
2 A. There is no specific
3 policy or procedure. There is no specific
4 procedure in place, and the way it works is that
5 if -- groups are different, and if a group is
6 doing social work that uses or deals with certain
7 interactions like this, just a simple
8 ratification, explanation, well presented to the
9 committee if they want to be approved.
10 339 Q. Does it have to be in
11 writing?
12 A. It doesn't have to be.
13 340 Q. Can I direct your
14 attention to Exhibit R of the application record,
15 to page 209. On that page, MIAS made a response
16 concerning systemic male privilege and why they
17 haven't acknowledged systemic male privilege.
18 Are there any reasons that
19 would permit a group not to acknowledge systemic
20 male privilege?
21 A. Sorry. Does that have
22 anything to do with the exhibit here?
23 341 Q. It may.
24 A. Do you want me to read
25 the exhibit first?

1 347 Q. Does RSU recognize that
2 some members of RSU may feel uncomfortable in an
3 environment that requires the acknowledgment of
4 male privilege?
5 A. Yes.
6 348 Q. Does RSU, regardless of
7 those members feeling uncomfortable, require that
8 student groups having conversations about male
9 privilege or conversations about men's issues
10 acknowledge male privilege, even though that
11 acknowledgment may make some members feel
12 uncomfortable?
13 A. Could you repeat that
14 question? I got lost with the privilege.
15 MS. WOOD: You lost me, too.
16 MR. MOORE:
17 349 Q. In spite of the fact that
18 the acknowledgment of male privilege may make some
19 RSU members feel uncomfortable, does RSU require
20 that in discussing men's issues, student groups
21 must acknowledge male privilege?
22 A. Sorry. What is the
23 question?
24 MS. WOOD: We have discussed
25 the fact that there is an RSU policy that says

1 342 Q. Are we on page 209?
2 A. Yes, page 209.
3 MS. WOOD: Sorry. I was on
4 208. Sorry. Systemic privilege.
5 MR. MOORE:
6 343 Q. Does the RSU acknowledge
7 that not all of its members would acknowledge
8 systemic male privilege?
9 A. I just want to clarify
10 for the record. Do I have to read this before I
11 answer anything?
12 344 Q. No, you don't.
13 A. So the question you are
14 asking right now is not related to Exhibit R?
15 345 Q. It is related, but this
16 question right now, you don't have to read that.
17 MS. WOOD: The question is
18 whether RSU members have to acknowledge systemic
19 privilege.
20 MR. MOORE: No, that is not
21 the question.
22 346 Q. Does RSU recognize that
23 not all members of RSU would acknowledge systemic
24 male privilege?
25 A. Yes.

1 systemic privilege cysts. RSU groups have to
2 abide by that policy. I am not sure where this
3 question is going, other than that statement that
4 we have already had.
5 MR. MOORE:
6 350 Q. I will try to clarify my
7 question. I am sorry.
8 A. I just didn't hear the
9 question. If you could ask the question part, not
10 the facts, maybe I can --
11 351 Q. I am going to try to
12 clarify the question, as well.
13 If the acknowledgment of male
14 privilege makes some members of RSU feel unsafe --
15 MS. WOOD: He didn't say that.
16 MR. MOORE:
17 352 Q. Does RSU still require
18 that that acknowledgment be made in that
19 circumstance?
20 A. I don't understand the
21 question.
22 353 Q. If the acknowledgment of
23 male privilege makes some RSU members feel
24 unsafe --
25 MS. WOOD: That is a new

1 concept.
2 MR. MOORE: That is a new
3 concept, yes.
4 THE WITNESS: If the
5 acknowledgment of --
6 MR. MOORE:
7 354 Q. If the acknowledgment of
8 male privilege makes some members of RSU feel
9 unsafe, does RSU still require an acknowledgment
10 of male privilege in that circumstance?
11 A. Are we talking about RSU
12 members or RSU student groups?
13 355 Q. RSU student groups.
14 A. RSU student groups are
15 separate from our members. Can you rephrase that
16 question for student groups?
17 MS. WOOD: This is entirely
18 hypothetical. We have no evidence anywhere that
19 an acknowledgment of systemic privilege has made
20 anyone feel unsafe. That has never been put
21 forward. As far as I know, there is no complaint
22 to the RSU to that effect.
23 THE WITNESS: Yes.
24 MR. MOORE:
25 356 Q. Can I direct your

1 attention to page 209, Exhibit R?
2 MS. WOOD: Right, the
3 discussion of systemic privilege.
4 MR. MOORE:
5 357 Q. Do you understand MIAS's
6 hesitation to acknowledge male privilege on the
7 basis that, quote, not everyone shares and it is
8 not our job in the executive to impose it on our
9 members, unquote?
10 A. That is not the
11 responsibility of a student group. A student
12 group comes together because they have a specific
13 belief and they have members that are part of that
14 community already.
15 The RSU entails -- if all of
16 our members said we need to change a policy,
17 through their elected representatives, they can
18 change those policies, but for a student group,
19 they need to follow what the RSU policy is.
20 We have general meetings.
21 Students are allowed to submit motions where all
22 student members can vote on them. If students
23 feel like they want to change something, they can
24 come out to those general meetings and vote
25 themselves. If not, they can talk to their

1 elected representatives and vote through elected
2 representatives at board meetings.
3 358 Q. If I understand your
4 answer, then, you do expect that regardless of
5 whether individuals in that student group adhere
6 to the concept of systemic male privilege, you
7 would expect the executives of that student group
8 to impose the concept of systemic male privilege
9 on that student group?
10 A. Could you repeat that?
11 MS. WOOD: No, that is not
12 what he is saying at all. You are saying impose
13 on the members. In no way has he said anything
14 about imposing views on members and making members
15 believe something. You are putting words in his
16 mouth.
17 MR. MOORE: I was asking for
18 clarification and understanding.
19 THE WITNESS: Could you
20 clarify what you were trying to clarify?
21 MR. MOORE:
22 359 Q. Sure. Do I understand
23 you correctly that student groups are required to
24 implement the view of RSU that acknowledges
25 systemic male privilege even if the members of

1 that student group, some of those members don't
2 acknowledge systemic male privilege?
3 A. The word "implement,"
4 what do you mean by that?
5 360 Q. Are they required to
6 acknowledge it in their meetings?
7 A. Student groups are
8 required to acknowledge RSU policies. They are
9 not required to implement RSU policies.
10 Acknowledging and implementing are two different
11 words. That changes the meaning drastically
12 between what you are asking me to clarify. I
13 would like to replace your "implement" and put
14 "acknowledge" there.
15 361 Q. Student groups are
16 required to acknowledge those policies. Are
17 student groups required to believe in RSU
18 policies?
19 MS. WOOD: I don't know if a
20 group can have a belief. I don't think that is an
21 appropriate question.
22 THE WITNESS: Individual
23 members are entitled to what they believe, but
24 when you take responsibility for a student group,
25 you have to follow certain policies.

1 MR. MOORE:
2 362 Q. You have to adhere to
3 those policies?
4 A. Yes.
5 363 Q. You would have to adhere
6 to those policies in your student group meetings,
7 so you couldn't have a student group meeting that
8 doubts whether systemic male privilege exists, for
9 example?
10 A. Could you repeat that
11 question, please?
12 364 Q. In order to understand
13 the level of adherence required, could you have a
14 student group meeting where the systemic privilege
15 of males is doubted?
16 MS. WOOD: I don't understand
17 your question. Are you talking about a student
18 group meeting that said, "Let's have a discussion
19 about it"? There is a difference between the
20 group's policy and the group adhering to RSU
21 policies and a group saying, "Let's have a
22 discussion about a topic."
23 MR. MOORE:
24 365 Q. If a student group, in
25 this case quite directly, had a meeting where the

1 student group refused to say whether systemic male
2 privilege exists but wanted to discuss that issue,
3 could they do that without violating the
4 requirement that you are talking about here?
5 A. If they are having a
6 discussion, they can have a discussion for any
7 topic they desire, whether that is they don't like
8 the RSU executives or they don't like a mandate.
9 If a student group is working on a specific
10 project, they are entitled to discuss it.
11 Acknowledging is a different
12 thing. They are allowed to discuss, but they have
13 to acknowledge it, and if they want change, there
14 are processes where they can make those changes.
15 366 Q. You were present at the
16 board meeting on Monday, January 25, 2015, that
17 considered the decision on Men's Issues Awareness
18 Society. Correct?
19 A. Yes.
20 367 Q. Do you recall the reasons
21 for the board's decision differing in any way from
22 the reasons we have discussed here today?
23 MS. WOOD: My co-counsel is
24 writing me a note. I want to make sure that we
25 didn't mishear. You asked if he was present at

1 the board of directors meeting. Correct?
2 MR. MOORE: Yes.
3 MS. WOOD: Just wanted to make
4 sure you didn't say "president." He wasn't the
5 president.
6 MR. MOORE: No, present.
7 Correct.
8 368 Q. Do you recall the
9 discussion surrounding the Men's Issues Awareness
10 Society that day?
11 A. To an extent.
12 369 Q. Do you recall the reasons
13 for the decision being different than the reasons
14 that you have talked about here today?
15 A. Are you asking if the
16 reasons in the board meeting were different from
17 what I have provided in my affidavit that I have
18 sworn?
19 370 Q. Yes. Can I direct your
20 attention to Exhibit M, please. There are five
21 concerns listed there. Do you recall those being
22 the same concerns that the board of directors had?
23 A. I will go over the board
24 meeting minutes.
25 371 Q. Sure.

1 A. Could you repeat your
2 question?
3 372 Q. The reasons for the board
4 decision, in your recollection, do they differ
5 materially from the reasons that have been set out
6 within the committee concerns document and the
7 answers that you have provided on that today?
8 A. The document here is my
9 recollection and are the facts of what happened.
10 373 Q. There is also part of
11 that document that is part of the discussion that
12 is in camera. I am asking for also your
13 consideration or your understanding of that. Does
14 that in camera discussion vary -- did it vary the
15 reasons --
16 A. No.
17 374 Q. -- that were provided
18 here, as well as on the committee concerns
19 document?
20 A. No.
21 375 Q. Essentially, the board
22 did not make this decision after that in camera
23 discussion for reasons other than what had been
24 specified in the documents?
25 A. The board did not change

1 their decision or make a new decision because the
2 reasons specified in the document before were not
3 answered, and if anything, they just became worse.
4 376 Q. I just maybe need five
5 minutes to canvass this.
6 MS. WOOD: Sure.
7 --- Recess taken at 3:22 p.m.
8 --- Upon resuming at 3:34 p.m.
9 MR. MOORE:
10 377 Q. Did RSU believe that or
11 have indications that any of the MIAS members were
12 violent or prone to violence?
13 A. Could you repeat that?
14 378 Q. Did RSU have indications
15 or believe that MIAS members were violent?
16 A. No.
17 379 Q. Did RSU believe that MIAS
18 executives were violent or prone to violence?
19 A. No.
20 380 Q. In regards to an unsafe
21 learning environment, to have a presentation about
22 high male suicide rates, high rates of male
23 homelessness or high rates of male school
24 dropouts, would that create an unsafe learning
25 environment?

1 MS. WOOD: He can't answer
2 that on behalf of the RSU, and it is not
3 appropriate to ask his personal opinion on that.
4 How is that relevant to anything? That was not
5 put to the RSU, that specific question.
6 MR. MOORE: It is being put to
7 the RSU right now.
8 MS. WOOD: In a hypothetical.
9 You are asking one member.
10 MR. MOORE: Who has sworn an
11 affidavit and is giving answers on behalf of the
12 RSU.
13 MS. WOOD: Go ahead, if you
14 can answer that on behalf of the RSU.
15 THE WITNESS: I will do my
16 best.
17 MR. MOORE:
18 381 Q. On behalf of the RSU,
19 would a presentation about high male suicide rates
20 create an unsafe learning environment?
21 A. It depends on the
22 presentation. It shouldn't, and I hope it
23 doesn't.
24 382 Q. Would a presentation
25 about high rates of male homelessness create an

1 unsafe learning environment?
2 A. What would that
3 presentation be?
4 383 Q. A speaker talking about
5 high rates of male homelessness.
6 A. What does that mean?
7 MS. WOOD: What would be in
8 the presentation? We need more information to be
9 able to answer that.
10 THE WITNESS: I need to go
11 through that presentation to be able to understand
12 and to make that judgment.
13 MR. MOORE:
14 384 Q. Whether it would create
15 an unsafe learning environment or not?
16 A. I need to go through that
17 presentation. I need to be in that environment.
18 385 Q. You would need to
19 evaluate what is being said in that presentation?
20 A. Evaluate what is being
21 said, how it is being said, where it is being
22 said, whom it is being said to. A ton of
23 different factors.
24 MR. MOORE: All right. Those
25 are my questions for today. I close my questions.

1 MS. WOOD: Great.
2 --- Whereupon the proceedings adjourned
3 at 3:37 p.m.
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<p style="text-align: center;">A</p> <p>a.m 1:12 3:3 A.S.A.P 1:22 abide 84:1,3 86:6 86:10 98:2 ability 70:13,20 71:5 111:7 able 41:2 86:20 109:9,11 Absolutely 64:6 accept 22:16 27:13 44:10,12 acceptable 75:2 access 10:1 11:10 11:24 accurate 38:1,4 111:6 accurately 82:18 acknowledge 65:10 66:11 68:6,9 83:16,20,24 84:4 84:13,15,18 85:12 85:15,19,25 87:6 87:11,24 94:22,24 94:25 95:19 96:6 96:7,18,23 97:10 97:21 100:6 102:2 102:6,8,14,16 104:13 acknowledged 95:17 acknowledges 87:13,18,22 101:24 acknowledging 68:1,12 83:21 102:10 104:11 acknowledgment 60:16,17,19 61:6 67:15,20 81:16 97:3,11,18 98:13 98:18,22 99:5,7,9 99:19 act 72:21 91:18 94:6</p>	<p>acting 21:20 action 32:13 actions 24:15,20 25:12 28:20 32:17 32:20 33:3 45:11 45:12 63:2,9,15 63:16,18,20,25 65:7 activities 7:6 activity 31:14 ad 57:23 addition 26:16 additional 8:14 18:21 57:25 additionally 69:16 address 36:19 60:18 63:20 81:19 81:24 addresses 71:21 addressing 14:24 adequate 39:25 40:3,4,14 adhere 101:5 103:2 103:5 adherence 103:13 adhering 103:20 adjourned 110:2 admission 61:24 admit 85:7 admitting 78:24 adopt 13:10 29:6 advantage 82:25 advise 46:10 advisement 2:16 4:17 ADVISEMENTS 2:8 affect 18:8,15 29:20 30:1 affiant 80:19 affidavit 4:5,23 8:20,22 16:20 21:3 23:16 24:19 25:19,24 28:10 30:11 45:16 47:10</p>	<p>73:19 88:2,3,5,10 88:14,16,18 89:13 93:2 105:17 108:11 affiliate 8:1 72:23 73:1 affiliated 78:10 affiliation 72:25 74:20,23 75:2,4,7 75:10,12,17,20 76:11 79:8 80:4 81:6 affiliations 76:19 affirmation 3:14 62:22 affirmed 2:3 3:4,13 agenda 92:6 agree 4:20 agreement 4:7,10 4:14 64:25 ahead 108:13 aim 64:24 Alan 1:16 alarming 37:23 ALEXANDRA 1:5 Alexi 1:17 allegations 76:19 76:22 78:18 alleged 43:10 68:16 77:12,17 allegedly 65:16 69:12,23 76:15 77:6 allocated 7:5 allowed 73:15 100:21 104:12 amended 14:2,25 15:6 amendments 58:6 amount 7:23 8:6,10 10:17 Amy 111:11 Andrea 44:7 46:19 69:23 annual 6:2,3</p>	<p>answer 22:6,19,24 25:4 29:10,15 34:19 43:16 44:13 49:19,22 50:15 53:11,14 63:21,25 65:22,23 66:1,22 66:24 71:23 75:23 77:10,22 96:11 101:4 108:1,14 109:9 answered 53:23 63:11,13,14 71:23 72:14 107:3 answering 42:21 answers 3:16 68:24 69:3,4 86:13 106:7 108:11 appeal 47:1 appealed 41:18 APPEARANCES 1:14 Applicants 1:6,15 application 4:11 16:25 17:23 18:23 19:9,12 20:3 39:4 44:13 70:8,9 95:14 apply 8:13 9:3,12 9:16 10:1,5,16 11:6 23:7,11,12 37:21 73:2 applying 10:2 appreciate 64:25 appropriate 102:21 108:3 approved 32:24 38:25 70:3 74:18 90:4,12,22 95:9 approximately 5:25 6:24 7:2,11,13,16 area 41:25 64:20 arisen 84:23 Arriola 1:5 42:6,14 43:19 45:10,12 77:8</p>	<p>Arriola's 62:1,7 73:19 ASAP 1:11 asked 48:17 53:12 54:11 59:18 64:17 68:23 69:6,14 84:18,23,25 85:3 104:25 asking 10:7 15:17 15:19,23 16:22,23 18:18,20 19:2,18 26:8,10,18 27:5 27:21 28:12 43:19 49:15,17 53:12 54:12,13,15,17 57:24 63:16,18 64:19 70:22 78:11 79:15 80:21 81:8 96:14 101:17 102:12 105:15 106:12 108:9 aspect 19:21,25 aspects 19:9 aspirational 12:24 assertion 72:1 assessment 59:3,6 59:10,15,22 60:3 60:10,14 assessments 31:19 associated 78:12 association 72:16 72:21 associations 72:6 assume 33:13 34:12 77:18 assuming 48:11 athletic 92:9,10 athletics 92:13 attached 89:12 92:5 attaches 88:3 attends 49:25 attention 12:8 30:10 37:24 39:11 39:14 70:6 73:19 79:6 81:14 88:2</p>
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