

Court File No. CV-16-544546

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

DIANE ZETTEL, CAMERON GRANT and CHAD HAGEL
Applicants

- and -

UNIVERSITY OF TORONTO MISSISSAUGA STUDENTS' UNION
Respondent

CROSS-EXAMINATION OF RUSS ADADE
on his Affidavit sworn March 4, 2016,
held at the offices of ASAP Reporting Services Inc.,
333 Bay Street, Suite 900, Toronto, Ontario,
on Tuesday, March 15, 2016, at 1:49 p.m.

CONDENSED TRANSCRIPT WITH INDEX

APPEARANCES:

Marty Moore on behalf of the Applicants
Alan Honner

Alexi Wood on behalf of the Respondent
Jennifer Saville

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INDEX

	PAGE
SWORN: RUSS ADADE	3
CROSS-EXAMINATION BY MR. MOORE	3

LIST OF UNDERTAKINGS & REFUSALS

Undertaking (U/T) found at page:

76

Refusals (REF) found at pages:

22, 29, 51, and 55

1 Toronto, Ontario
2 --- Upon commencing Tuesday, March 15, 2016, at
3 1:49 p.m.
4 SWORN: RUSS ADADE
5 CROSS-EXAMINATION BY MR. MOORE:
6 1 Q. Good afternoon, Mr.
7 Adade.
8 A. Good afternoon.
9 2 Q. Could you state your name
10 for the record?
11 A. Russ Adade.
12 3 Q. Can you confirm today
13 that the answers you give will be binding on your
14 conscience?
15 A. Yes.
16 MS. WOOD: That was not a
17 trick question. I promise.
18 MR. MOORE:
19 4 Q. Can you confirm that your
20 answers are binding on UTMSU, as well?
21 A. Yes.
22 5 Q. Prior to receiving SFL's
23 application for renewal as a recognized student
24 group, were you familiar with SFL?
25 A. I have heard about the

1 club, so no. Originally, no.
2 6 Q. You had heard about it
3 prior to their application?
4 A. Yes. Like, as you hear
5 about a bunch of student clubs around UTM because
6 UTM is a very small campus. It wasn't like I was
7 a general member within the club, but I heard
8 about the club.
9 7 Q. What did you hear about
10 the club prior to the application they submitted?
11 A. Just through passing,
12 like, informal conversations in regards to the
13 status of the club in terms of what they kind of
14 represented and how certain folks felt in regards
15 to the club itself.
16 8 Q. How had people indicated
17 to you that they felt about the club?
18 A. Just I got the feeling
19 they kind of felt uncomfortable with the club, but
20 this was just like conversation either I heard
21 them, I was just passing. It wasn't anything I
22 kind of, like, paid attention to at that time
23 because I had no affiliation in regards to the
24 club or even the student union at that time,
25 prior, before I got my position with UTMSU.

1 9 Q. You became vice president
2 of Campus Life in May 2015?
3 A. Yes.
4 10 Q. I guess that was your
5 first involvement with UTMSU in a role as an
6 employee or executive?
7 A. Yes.
8 11 Q. Had you had any
9 involvement with campus clubs before that role?
10 A. Prior to me being VP
11 Campus Life UTMSU, I was the president of the
12 Caribbean Connection Club, which is a club that
13 was recognized under UTMSU. I was vice president
14 of administration for the Athletic Council, but
15 that is not with UTMSU. That is with the
16 administration.
17 12 Q. Upon becoming vice
18 president of Campus Life in May 2015, I guess, did
19 you go through any training for that role?
20 A. The Campus Life position?
21 13 Q. Yes.
22 A. No.
23 14 Q. Did you familiarize
24 yourself with the policies concerning, I guess,
25 campus clubs and registered student groups?

1 A. Before I got the position
2 or after?
3 15 Q. Immediately after, I
4 guess.
5 A. Yes, after. I was
6 transitioned by Francesco. Before becoming VP
7 internal, he was VP Campus Life. He was
8 transitioning me when I first got the position.
9 16 Q. Directing your attention
10 to paragraph 5 of your affidavit?
11 MS. WOOD: We have it.
12 MR. MOORE:
13 17 Q. It states there that "I
14 was concerned that SFL's pro-life mandate did not
15 comply with UTMSU policies." (As read.) Is that
16 correct? Does it state that -- did I read that
17 correctly?
18 A. Yes, you did.
19 18 Q. What specific UTMSU
20 policies were you concerned that it did not comply
21 with?
22 A. It was just the fact
23 that, like, in regards to the club being
24 pro-life -- in regards to that, it kind of
25 conflicted in terms of UTMSU. Even though it

1 doesn't state in the UTMSU policy that they are
2 specifically a pro-life club, it is just that, in
3 regards of UTMSU affiliation with, like, CFS, they
4 always be a part of a motion that has passed in
5 regard CFS's mandate. CFS is a pro-choice
6 organization. It was conflicting just in terms
7 of, like, what kind of UTMSU's standpoint,
8 viewpoints were on.

9 19 Q. This was -- when you were
10 concerned that their mandate did not comply, this
11 was after you reviewed their application for
12 renewal sometime after June 1st?

13 A. Yes.

14 20 Q. Like, within the month of
15 June, you were concerned -- you had this concern
16 that they didn't comply?

17 A. Yes.

18 21 Q. You had been in your role
19 with UTMSU as the VP of Campus Life for over a
20 month at that point?

21 A. Yes.

22 22 Q. You had become familiar
23 with the relationship between UTMSU and CFS at
24 that point?

25 A. Yes.

1 23 Q. In regards to not
2 complying with specific UTMSU policies, it is not
3 a specific policy that we are referencing. It is
4 more the policy relationship with CFS. Do I
5 understand you correctly?

6 A. Yes.

7 24 Q. In regards to your prior
8 knowledge of concerns that people had with SFL
9 making them uncomfortable, could you describe what
10 specifically SFL was doing that made them
11 uncomfortable if you are aware of that?

12 MS. WOOD: Sorry. I don't
13 mean to interject here, but I am actually not sure
14 that you got that evidence from Mr. Adade already
15 in terms of other people saying they were made to
16 feel uncomfortable. I was looking at Chris to
17 check his notes, but I don't think you got that
18 evidence from him already. You may want to back
19 up and ask him those questions first.

20 MR. MOORE: Can I go off the
21 record?

22 --- (Off-record discussion)

23 MS. WOOD: My apologies if Mr.
24 Adade had already said that. I wanted to make
25 sure we had it in this transcript and not in a

1 different transcript.

2 MR. MOORE: Could you repeat
3 the last question?

4 --- Readback provided.

5 THE WITNESS: From what I
6 heard in terms of, like, informal conversation, it
7 was just more, like, the posters they were putting
8 up around campus were making people feel
9 uncomfortable, them tabling whether it was during,
10 say, like, a clubs week or event they were having,
11 or even if they were just promoting their club and
12 creating more awareness for the club and having
13 particular diagrams where basically they were
14 creating a space that wasn't very comfortable for
15 everyone that entered that space or the space they
16 created for people who were entering into their
17 space.

18 MR. MOORE:

19 25 Q. When you saw SFL's
20 application for renewal, did you recall those
21 informal discussions about SFL that you had
22 previously?

23 A. No. Originally, when I
24 received the application, I wasn't aware of what
25 club it was until we read the recognition process.

1 This is my first time as VP of Campus Life. I had
2 to, like, familiarize myself with all the clubs
3 that were submitting their either new club
4 recognition or re-recognition package. I wasn't
5 familiarized with the club until I read their
6 mandate and basically their re-recognition
7 package.

8 26 Q. When you read their
9 re-recognition package, did you connect that that
10 club was the club that you had informal
11 discussions about previously in the previous year
12 and heard complaints about?

13 A. Yes.

14 27 Q. When you became aware of
15 the renewal application of SFL and the issues with
16 the concerns you had with their mandate and
17 whether it complied with UTMSU's mandate and also
18 had recognized that this club had had -- you had
19 heard concerns from students about this club
20 making them feel uncomfortable. Did you bring
21 those concerns to SFL? Did you raise those
22 concerns with them at that point?

23 A. No.

24 28 Q. Did you ever talk with
25 SFL about the nature of their posters?

Page 11

1 A. No.
2 29 Q. Did you ever address with
3 SFL the concerns about their diagrams or their
4 tabling materials?
5 A. No.
6 30 Q. You weren't concerned
7 that SFL was endangering people's physical safety,
8 were you?
9 A. Can you repeat the
10 question?
11 31 Q. You weren't concerned
12 that SFL was endangering people's physical safety
13 with those materials or posters; correct?
14 A. No. I didn't feel they
15 were endangering people --
16 32 Q. Just that they were
17 making people feel uncomfortable in those spaces?
18 A. Yes.
19 33 Q. Over the summer of 2015,
20 the Clubs Committee met and discussed the
21 application for renewal of SFL; correct?
22 A. Correct.
23 34 Q. SFL wasn't involved in
24 those meetings and didn't give presentations or
25 wasn't notified of those meetings; correct?

Page 13

1 MR. MOORE: My apologies.
2 MS. WOOD: No problem at all.
3 Is this your report?
4 THE WITNESS: Yes.
5 MR. MOORE:
6 38 Q. On page 248 of the
7 affidavit of Mr. Otello-Deluca, Exhibit M, you
8 gave a report to the board stating the reasons why
9 you did not renew SFL's status, and it states -- I
10 will just read it.
11 "Students for Life, which
12 has been recognized by
13 UTMSU in the past, was
14 not recognized for the
15 upcoming school year due
16 to their stance on
17 abortion in terms of
18 being pro-life and using
19 their platform to tell
20 women what they should do
21 in those situations." (As
22 read.)
23 Did I read that correctly?
24 A. Yes.
25 39 Q. You then e-mailed SFL on

Page 12

1 A. Correct.
2 35 Q. The Clubs Committee made
3 a decision not to renew SFL's status without
4 notifying SFL before they made that decision;
5 correct?
6 A. Can you repeat that
7 question again?
8 36 Q. The Clubs Committee made
9 a decision not to renew SFL's status before they
10 notified SFL that they had concerned about
11 renewing that status?
12 A. Correct.
13 37 Q. If you have the affidavit
14 of Mr. Otello-Deluca, at Exhibit R in that
15 affidavit, there is a report that you made to the
16 board of directors.
17 MS. WOOD: I don't think that
18 is Exhibit R. Exhibit R is a letter from you.
19 MR. MOORE: Perhaps I am
20 confused.
21 MS. WOOD: You are looking for
22 Mr. Adade's report to the board?
23 MR. MOORE: Yes.
24 MS. WOOD: I think it is at
25 Exhibit M.

Page 14

1 August 26th to let them know of your decision --
2 of the decision of the Clubs Committee not to
3 renew their status; correct?
4 A. Yes.
5 40 Q. Did you tell the Clubs
6 Committee that it was because of their pro-life
7 stance that their application for renewal was not
8 granted in that August 26th e-mail?
9 A. Can you repeat the
10 question in regards to --
11 MS. WOOD: Do you want to look
12 at the e-mail?
13 THE WITNESS: Are you talking
14 about the conversation I had or the conversation
15 in the e-mail?
16 MR. MOORE:
17 41 Q. I am asking in regards to
18 the e-mail you sent to SFL on August 26th
19 notifying them that their application for club
20 status renewal had been rejected. Did you let
21 them know it was their pro-life position that
22 caused the denial of their status?
23 A. The e-mail was in regards
24 to their club's mandate.
25 42 Q. You stated it was their

1 club's mandate?
2 A. Yes.
3 43 Q. Was there any reason why
4 you didn't indicate that it was specifically the
5 fact they were a pro-life club that was the
6 problem?
7 A. Yes. Originally, when I
8 sent out the e-mail, the issue was that their
9 mandate was their stance on this position. So I
10 informed them that the reason why the Clubs
11 Committee had decided as a collective not to
12 receive their re-recognition was the fact that
13 their mandate showed or stated that they were a
14 pro-life club.
15 44 Q. All right. In this
16 e-mail particularly, did you specify what in their
17 mandate was at issue, i.e., did you specify that
18 the problem was that they were a pro-life club?
19 A. No, I did not specify it.
20 45 Q. Did you specify in a
21 later -- when did you specify to SFL that the
22 issue was the fact they were a pro-life club? Do
23 you know?
24 A. I can't recall the
25 specific date that I sent the second e-mail to

1 Students for Life, but in the second e-mail, I did
2 specify.
3 46 Q. Was there any reason why
4 you didn't specify in the August 26th e-mail that
5 the reason why the club was denied was because it
6 was specifically a pro-life club?
7 A. No. I just sent them the
8 e-mail just in regards that within their
9 mandate -- because when the Clubs Committee were
10 having our meeting in regards to SFL, we discussed
11 how their mandate was conflicting with UTMSU's
12 policies and views on this particular situation.
13 The e-mail sent was just to let those folks know
14 the reason why they didn't receive their
15 recognition package was due to their mandate.
16 47 Q. It was a general e-mail
17 about the mandate but not specific about the
18 actual issue of being pro-life?
19 A. Yes.
20 48 Q. The exhibit that we are
21 on there with the e-mail is exhibit --
22 MS. WOOD: It is Exhibit N,
23 page 251 of the responding record.
24 MR. MOORE: Exhibit N is the
25 August 26th e-mail that we were just reviewing?

1 MS. WOOD: Correct.
2 MR. MOORE:
3 49 Q. Turning your attention to
4 the next exhibit, this is an e-mail you sent to
5 SFL on September 23rd?
6 A. Correct.
7 50 Q. I will just read the
8 paragraph which begins with "The reason why."
9 "The reason why Students
10 for Life was not reviewed
11 for the 2015-2016
12 academic school year
13 under UTMSU because the
14 club's constitution is a
15 direct conflict with the
16 UTMSU mission statement
17 because you are telling
18 folks, especially women,
19 what to do with their
20 bodies. Regardless of
21 the situation, every
22 individual, man or woman,
23 has the right to make
24 their own decision when
25 it comes to their body,

1 and you folks can't put
2 them down for making a
3 decision that doesn't fit
4 with your mandate." (As
5 read.)
6 Did I read that correctly?
7 MS. WOOD: Actually, sorry.
8 No, you didn't.
9 MR. MOORE: I didn't read that
10 correctly.
11 MS. WOOD: The first line,
12 "The reason why Students for Life was not
13 renewed." I believe you said, "reviewed for the
14 2015-2016 academic school year." I just wanted to
15 clarify that.
16 MR. MOORE: Thank you.
17 51 Q. You reference in that
18 statement, Mr. Adade, in this e-mail on September
19 23rd that "you are telling folks, especially
20 women, what to do with their bodies." (As read.)
21 Did you have -- what did you mean by that
22 statement?
23 A. Basically, the
24 conversation I had with students that have been --
25 what is the word? Encounters with Students for

1 Life, whether it is either they had a discussion
2 with them or either they have seen their posters
3 or seen them tabling, in any formal capacity, they
4 just came to me basically telling me how they felt
5 in regards to their club and their stance on
6 abortions and being a pro-life club. That is what
7 I meant in regards to those statements as seen in
8 the affidavit.

9 52 Q. Were you aware of any
10 specific instances where SFL had put other people
11 down?

12 A. Me personally, no.

13 53 Q. But is it the view -- is
14 it your view that these individuals who had come
15 to you felt put down because of SFL's pro-life
16 stance?

17 A. Yes.

18 54 Q. And that UTMSU students
19 felt that the pro-life stance took told them what
20 to do with their bodies?

21 A. I wouldn't say all UTM
22 students in terms of general. Students that did
23 raise an issue with the club brought it to either
24 my attention or the attention of UTMSU executives
25 in regards to their stance on those issues.

1 55 Q. Do you know if those
2 complaints or those concerns that were brought to
3 your or UTMSU executives were discussed or
4 addressed with SFL?

5 A. No.

6 56 Q. From your e-mail, Mr.
7 Adade, on September 23rd, do I read it correctly
8 that you felt that, because SFL had a pro-life
9 stance, they were telling women what to do with
10 their bodies?

11 A. Yes.

12 57 Q. Do I also understand
13 correctly that because of SFL's pro-life stance
14 you felt they were putting folks down who had made
15 a decision to have an abortion?

16 A. Yes. Just due to the
17 conversation I had with students who came to me
18 who raised concerns about the club.

19 58 Q. In referencing both the
20 e-mail on August 26th and the e-mail on September
21 23rd, it appears that you indicated to SFL that
22 they could request the board of directors to
23 revoke on the decision of the Clubs Committee not
24 to renew their club status. Did you do that?

25 A. Repeat that again.

1 59 Q. Did you indicate in both
2 e-mails on August 26th and September 23rd to SFL
3 that they could request the board of directors of
4 UTMSU to revoke on the decision of the Clubs
5 Committee not to renew their status?

6 A. Yes. Originally, that
7 was missing in terms of, like, how the process is.
8 They could request for an appeal, but it has to go
9 back to Clubs Committee.

10 60 Q. Both in the August 26th
11 e-mail, which is include at Exhibit N, and in the
12 September 23rd e-mail at Exhibit O of Mr.
13 Otello-Deluca's affidavit, you indicated that they
14 could request the board of directors to revoke on
15 the matter. Is that correct?

16 MS. WOOD: He said it. It is
17 in the e-mail.

18 MR. MOORE:

19 61 Q. That is correct?

20 A. Yes.

21 MS. WOOD: It is correct in
22 that it is in the e-mail. He said it was a
23 mistake, but it is correct that it is in the
24 e-mails.

25 MR. MOORE: All right.

1 62 Q. At the time you sent
2 those e-mails, you didn't believe it was a
3 mistake, though. You sent those e-mails believing
4 they actually could request the board of directors
5 to revoke on the decision of the Clubs Committee
6 not to renew their status; correct?

7 A. Yes, in regards to when I
8 sent the e-mails.

9 63 Q. All right. You became
10 aware that was not going to happen through
11 discussions with other members of the Clubs
12 Committee, that the board of directors would not
13 hear the appeal?

14 REF MS. WOOD: Sorry. I am going
15 to object to that phraseology and that implication
16 that that was not going to happen. That implies
17 they somehow changed their policy. Mr. Adade said
18 it was a mistake. He was mistaken. He made a
19 mistake. It is not that they changed their
20 policy. I object to your phraseology on that. It
21 implies they somehow did something incorrect. He
22 simply made an error.

23 MR. MOORE:

24 64 Q. Does UTMSU have any
25 specific policies governing the appeal of

1 decisions by the Clubs Committee to deny student
2 group status?
3 A. Yes.
4 65 Q. Written policies?
5 A. Yes.
6 66 Q. Do you know where those
7 written policies are located?
8 A. In regards to --
9 67 Q. Written policy concerning
10 appealing decisions of the Clubs Committee?
11 A. In regards to a club that
12 is denied recognition?
13 68 Q. Right.
14 A. It can be found either in
15 the Clubs' policy or the Clubs' handbook as well
16 as the UTMSU's policies.
17 69 Q. When did you become aware
18 that the board of directors would not hear the
19 appeal of SFL from the Clubs Committee's decision
20 not to renew their student group status?
21 A. Can you rephrase that?
22 70 Q. When did you become aware
23 that the board of directors wouldn't hear an
24 appeal from SFL of the decision not to give them
25 student group status in 2015-2016?

1 to recognize them?
2 A. Can you repeat the
3 question?
4 73 Q. Were you aware that SFL
5 was expecting to have the board of directors hear
6 the appeal of the Clubs Committee decision not to
7 give them student group status?
8 A. When we allowed them to
9 present at the Clubs Committee meeting?
10 74 Q. Sorry. I think it may be
11 a misunderstanding. Were you aware that the
12 Students for Life were expecting to have the right
13 to appeal to the board of directors rather than
14 make an appeal to the Clubs Committee?
15 A. Through the first set of
16 e-mails that was sent, the first two, yes.
17 75 Q. Did the Clubs Committee
18 think that its decision to deny SFL's student
19 group status was wrong after it made that
20 decision?
21 A. Sorry. Can you repeat
22 that question?
23 76 Q. Did the Clubs Committee
24 feel that the decision it had made to deny SFL
25 student group status was wrong after it had made

1 MS. WOOD: Subject to my
2 previous comments you can answer the question.
3 THE WITNESS: I wouldn't say
4 they wouldn't hear it. It was just in regards to
5 a mistake in the process. Originally, in regards
6 to the process, they could appeal, but it would
7 have to be taken back to Clubs Committee; right?
8 Then once we discussed, we gave them a space
9 during one of our Clubs Committee where we allowed
10 them to come and present their case to the Clubs
11 Committee.
12 MR. MOORE:
13 71 Q. You became aware of that
14 specific appeal process when, in September or in
15 October?
16 A. After the second e-mail I
17 sent and that was after with consultation with
18 Walied and Francesco was our VP internal just to
19 make sure we were doing everything procedural.
20 Once I found out the mistake, I let Students for
21 Life know.
22 72 Q. Were you aware that
23 Students for Life was expecting to ask -- was
24 expecting to have the board of directors hear
25 their appeal of the Clubs Committee's decision not

1 that decision?
2 A. No. We denied them based
3 off their mandate as well as their constitution
4 where we found discrepancies after we looked
5 further into it.
6 77 Q. All right. But the Clubs
7 Committee was going to hear their appeal anyway,
8 though?
9 A. Yes, if they requested
10 for an appeal.
11 78 Q. At paragraphs 44 and 45
12 of Mr. Otello-Deluca's affidavit, he indicates
13 that there was a comprehensive audit undertaken of
14 every student group by the VP of Campus Life which
15 is yourself and that you worked with all student
16 groups to fix the deficiencies identified in that
17 audit and the only exception to groups that fixed
18 their deficiencies was SFL. Did you, in the
19 summer of 2015, undertake a comprehensive audit of
20 every student group that had applied for
21 recognition with UTMSU?
22 A. Yes.
23 79 Q. Did you specifically
24 audit SFL during the summer of 2015?
25 A. Yes, alongside with our

1 Clubs Coordinator, Jason.
2 80 Q. Did you identify any
3 issues with their group's financials, practices,
4 governing documents?
5 A. With other clubs?
6 81 Q. With SFL's financials,
7 practices, or governing documents during that
8 comprehensive review in the summer of 2015?
9 A. No.
10 82 Q. Did you raise any issues
11 with SFL during the summer of 2015?
12 A. During the recognition
13 period where we were looking through the items?
14 83 Q. Right.
15 A. Sorry. I forgot the
16 question.
17 84 Q. You didn't raise any
18 issues with SFL's financials, practices, or
19 governing documents during the summer of 2015?
20 MS. WOOD: I want him to put
21 some time on that. What do you mean by "summer"?
22 In June of 2015?
23 MR. MOORE:
24 85 Q. This period referenced in
25 the affidavit of Mr. Otello-Deluca references the

1 "After working with the
2 Vice President Campus
3 Life and Clubs
4 Coordinator, all student
5 groups fixed the
6 deficiencies identified
7 by the Vice President
8 Campus Life with the
9 exception of UTM Students
10 for Life." (As read.)
11 The reason why UTM Students
12 for Life didn't fix the deficiencies is because
13 they weren't notified of the deficiencies;
14 correct?
15 A. Before --
16 90 Q. During this period, in
17 the summer of 2015, the reason why UTM Students
18 for Life didn't fix the deficiencies likely was
19 because they weren't notified of any deficiencies
20 in their constitutional documents?
21 REF MS. WOOD: You are conflating
22 time periods here. He has answered you that there
23 was this initial work that was done where there
24 was an issue identified with the mandate. He has
25 also said that then there was additional

1 summer of 2015. So I am assuming this references
2 June and July as the period when you undertook a
3 comprehensive audit of every student group. Is
4 that correct?
5 A. Yes.
6 86 Q. During that period of
7 time, June and July, did you raise any issues with
8 SFL concerning deficiencies in their financial,
9 practices, or governing documents?
10 A. No, not during the audit
11 recognition period.
12 87 Q. But you raised issues
13 with a lot of other student groups; correct?
14 A. Yes. That was just with
15 more either their constitutional or this was more
16 like a mandate. We took it straight to the Clubs
17 Committee to discuss about it.
18 88 Q. The issue wasn't -- you
19 weren't looking for their constitutional issues at
20 that point. You were looking more at the mandate.
21 Therefore, you went straight to the Clubs
22 Committee to discuss it?
23 A. Yes.
24 89 Q. When Mr. Otello-Deluca
25 says at paragraph 45 that:

1 constitutional discrepancies.
2 Mr. Otello-Deluca's affidavit,
3 you are improperly bringing that in. He is
4 talking about generally what is happening. His
5 sentence here -- you could have asked him about
6 this when he was here before.
7 "After working with the
8 Vice President Campus
9 Life and Clubs
10 Coordinator, all student
11 groups fixed the
12 deficiencies." (As read.)
13 There is no timeframe
14 associated with that. That could have been at any
15 time after the summer, into the fall of 2015. You
16 didn't ask him about the timeline.
17 MR. MOORE: All right.
18 91 Q. SFL wasn't working on any
19 deficiencies or wasn't notified of any
20 deficiencies in their documents during the summer
21 of 2015; correct?
22 A. Correct.
23 92 Q. You worked with a number
24 of student groups to correct deficiencies in their
25 constitutional documents or other issues that you

1 identified. When did you do these -- when did you
2 complete working with these student groups to
3 correct these deficiencies?

4 A. I can't recall when we
5 had ended. Actually, it is not really like an
6 ending process because it really depends on the
7 clubs; right? We had a deadline, like, that all
8 clubs to submit their recognition package by June
9 1st, if I recall. Then certain clubs will submit
10 theirs, like, later on due to whatever reason.

11 The batch we had that was
12 submitted on time, those are the ones we were able
13 to send to Clubs Committee. If they had any
14 issues, like the documents we will look at, or
15 whether it was, say, their election procedure,
16 their -- not their proposals -- their financial
17 statements or proposed budgets were kind of, like,
18 off or didn't look correct or anything like that
19 or we found discrepancies within their
20 constitutions in terms of, like, not having a
21 number of executives or not having a number, say,
22 at least 25 signatures from the membership, that
23 is something we took back to the clubs and said,
24 "We found a couple discrepancies, so you folks
25 have to fix it and resubmit it."

1 In regards to the whole
2 process, there is not really, like, an end process
3 probably until late within the first semester.
4 You are always going to have clubs that submit it
5 late. You are always going to have clubs that --
6 student that want to start new clubs in September.
7 That is along the process, as well.

8 93 Q. Thank you. For the clubs
9 that submitted their applications by the deadline
10 in June, when would you say the discrepancies had
11 been fixed for those clubs? When had they kind of
12 addressed the issues you brought to their
13 attention?

14 A. Probably within two,
15 three weeks if we find discrepancies, we will let
16 club executives know in regards to their
17 recognition package why we weren't able to accept
18 it at this time because they have to make these
19 changes before we can go through it again and then
20 take it to Clubs Committee.

21 94 Q. They would have received
22 their recognition after correcting their
23 discrepancies by September or something like that?

24 A. Yes, if that is what the
25 Clubs Committee voted on in terms of it being

1 ratified at the Clubs Committee or being voted on
2 at the Clubs Committee.

3 95 Q. All right. In regards to
4 clubs that had to make changes with their
5 constitution or make elections, how were you
6 involved in assisting those clubs?

7 A. Just letting them know
8 the changes that needed to be done; right?
9 Whatever was stated in, like, our Clubs' handbook
10 or policy, those are the rules that all clubs have
11 to abide by. I use that basically as the template
12 in terms of, like, the changes that needed to be
13 made.

14 For example, if they want to
15 start a new club but there is only three
16 executives, you won't be eligible to even start a
17 new club let alone be able to get a year
18 recognition pass taken up to Clubs Committee
19 because those things need to be done to be
20 eligible to go to Clubs Committee.

21 96 Q. When you -- I am assuming
22 there are clubs that submitted applications, and
23 they only had three executives then?

24 A. Yes.

25 97 Q. Did you attend the

1 meetings where they elected their executives for
2 those clubs?

3 A. Those clubs -- no,
4 because those clubs, for example, didn't have
5 their executives -- didn't vote on their
6 executives for the four executives. They didn't
7 end up coming back for the recognition package.
8 So they just --

9 98 Q. How about for clubs with
10 changes to their constitution? Did you attend
11 those meetings where they needed to make changes
12 to their constitution?

13 A. I didn't personally
14 attend. Our Clubs Coordinator, Jason, did.

15 99 Q. Did the clubs that needed
16 to make changes to their constitution -- did they
17 post posters around campus notifying other
18 students of these meetings?

19 A. I am not specifically
20 sure, but they have different ways to promote
21 their general meetings; right? We live in the
22 technology era, so if they weren't, like, using
23 specifically posters they would probably create a
24 Facebook event page, probably use different social
25 media platforms, probably e-mail their membership

1 to let them know about the general meetings.
2 100 Q. A meeting to make changes
3 to a constitution or elect an executive, that can
4 be done even at a special meeting. It doesn't
5 have to be a general meeting; correct?
6 A. Correct.
7 101 Q. Does a club automatically
8 lose its official status if there is a vacancy in
9 one of its four executive positions? Do you know?
10 A. I have to double check
11 within the Clubs' handbook, but if we are aware of
12 that a vacancy has opened up, they wouldn't lose
13 status. They would go through a process where,
14 like -- through the general membership of being
15 able to elect one.
16 102 Q. Can a club still carry on
17 its business while it only has three executives?
18 A. No.
19 103 Q. It can't hold meetings
20 even with only three executives?
21 A. Because then it wouldn't
22 be -- it states in the Clubs' handbook there has
23 to be four executives for the club to even
24 function. The only way it would be to do that if
25 we weren't made aware of it.

1 104 Q. Do you know the reason or
2 has there been discussed a reason why it is
3 necessary to have four executives -- a practical
4 reason why it is necessary to have four executives
5 for a club to function?
6 A. That is what it states in
7 the Clubs' handbook in regards to the UTMSU Clubs'
8 handbook and the policies in regards to why four
9 executives is needed within the club. I am not
10 sure specifically what is the reason why there
11 needs to be four executives, but I am just going
12 by what the rule book says.
13 MR. MOORE: Do we feel like a
14 break would be good?
15 MS. WOOD: Sure. We will take
16 a quick break.
17 --- Recess taken at 2:38 p.m.
18 --- Upon resuming at 2:51 p.m.
19 MR. MOORE:
20 105 Q. I will direct your
21 attention, Mr. Adade, to Exhibit E of the
22 affidavit of Mr. Otello-Deluca.
23 MS. WOOD: It is the Clubs'
24 handbook.
25 MR. MOORE: Yes, the Clubs'

1 handbook.
2 106 Q. Beginning at, I guess,
3 page 119 identified on the application record,
4 point No. 2 states that -- what kind of clubs must
5 adhere to UTMSU -- the policies stated in the
6 Club's handbook? Do you see what kind of clubs
7 are referenced there at point No. 2?
8 A. Recognized clubs.
9 107 Q. All right. Recognized
10 clubs. Does the Clubs Committee or UTMSU Clubs'
11 policy apply to non-recognized clubs?
12 A. In regards to having them
13 be able to function as a club?
14 108 Q. Right.
15 A. No. It only applies to
16 clubs that are recognized or want to be
17 recognized.
18 109 Q. Is there a specific
19 statement in the policy that states that clubs
20 that want to be recognized have to comply with
21 these policies before they are recognized?
22 A. Yes.
23 110 Q. Could you point me to
24 that statement?
25 A. Number 1 is, "All

1 union-recognized clubs must have a constitution on
2 file with UTMSU." (As read.) That means all
3 UTMSU's constitutional guidelines. "A copy of the
4 format and article requirements for this
5 constitution is included on page 6 of the
6 handbook." (As read.)
7 With that, it states that,
8 when clubs are creating their constitution, it has
9 to be in line would the UTMSU's constitutional
10 guidelines. We even provide a template how for
11 new clubs to create a constitution that will be
12 aligned with the UTMSU's constitutions.
13 111 Q. When these prospective
14 clubs are making their changes to their documents,
15 are they required to comply with all of the
16 provisions of the Clubs' handbook?
17 A. Yes.
18 112 Q. Does it state that
19 anywhere?
20 A. Within the Clubs'
21 handbook.
22 113 Q. Is there any specific
23 statement that you -- that an unrecognized club
24 must have their elections supervised by the Clubs
25 Coordinator or the campus VP?

1 A. If I remember correctly,
2 yes. One of us, either me or the Clubs
3 Coordinator, had to be there to supervise or at
4 least be aware of the elections.
5 Also, clubs do have the right
6 to have a CRO oversee their election, as well,
7 which could be a student that is not per se, like,
8 a member of the club or is not running within the
9 club's election so it doesn't create any form of
10 bias or any conflict of interest when the clubs
11 are holding their elections.
12 If me as a VP Campus Life or
13 Jason as campus coordinator are not there to
14 supervise actual elections, they must have a CRO
15 present.
16 114 Q. That applies to
17 recognized clubs?
18 A. Yes.
19 115 Q. In regards to what you
20 are just referencing about club members -- only
21 club members can stand for election. Who is a
22 member of a club, and how do you become a member
23 of a club?
24 A. Numerous ways. It really
25 depends on the club's constitution and how they

1 have created it. One, the golden rule, is every
2 club -- their membership has to be open to all UTM
3 students; right?
4 Every club should make all
5 their events, general meetings for the most part
6 accessible to everyone who wants to participate
7 within their space; right? That is one way in
8 regards to being a member because in reality --
9 not in reality. UTM students are automatically
10 part of their membership because it is open to all
11 UTM students.
12 Now specifically, clubs have
13 different ways in regards to how students can
14 become a member in terms of, like, having their
15 members pay a membership fee which basically helps
16 them. Whether it is, like, help with the cost,
17 gives the members within that club benefits,
18 allows them status of membership that allows them
19 to run for executive position or be eligible to
20 vote.
21 It really depends on the club
22 and how their constitution is created. You are
23 going to have -- clubs are just willing to have
24 everything open up to UTM students without no
25 restrictions. You are going to have clubs that

1 might have restrictions where they might have to
2 pay a membership fee or they might have to attend
3 X amount of events to be eligible to vote.
4 116 Q. Otherwise, if I
5 understand correctly, your interpretation is that,
6 if a club doesn't have any restrictions on
7 membership, then its membership includes -- all
8 the UTMSU members are also member of that club?
9 A. That want to partake in
10 their -- that want to participate with their club.
11 117 Q. What does that mean,
12 "want to participate"? Support the mandate of
13 that club? That want to get involved?
14 A. Yes. In regards to -- if
15 there is no restriction within that specific club
16 and, basically within their constitution, it says
17 it is open to UTM students and students want to
18 get involved with that club, they can.
19 118 Q. Right.
20 A. It really depends on the
21 club and how their constitution is -- how the
22 constitution is based within that club.
23 119 Q. If a student simply wants
24 to show up at a meeting and vote, does that
25 constitute wanting to get involved for the

1 purposes of membership?
2 A. Can you rephrase the
3 question again?
4 120 Q. If a student didn't want
5 to participate in any of the activities of a club?
6 A. Did not want to?
7 121 Q. Did not want to but did
8 want to vote in a club meeting, would that student
9 constitute a member of that club?
10 A. It depends within the
11 club's constitution. If in the constitution it
12 states that, for students to be eligible to vote,
13 all they need to do is just sign in before the
14 procedures happen, that gives them the right to
15 vote.
16 122 Q. All right. If a club's
17 constitution is silent and doesn't state anything
18 concerning its members' right to vote, does just
19 showing up at a meeting give every UTMSU member
20 the right to vote at that meeting of that club
21 without restrictions in the constitution?
22 A. What do you mean in
23 regards to silence?
24 123 Q. If the club constitution
25 doesn't state that you have to sign up to vote or

1 it doesn't state that you have to pay a membership
2 fee. It just states that club members can vote in
3 elections?

4 A. Any club constitution has
5 to be specific in regards to how they set their
6 membership in regards to any practice or
7 procedures within their club. If it is silent in
8 regards to it is not very specific or there are no
9 restriction, then generally, all folks -- all the
10 club has to do in regards to -- or even students
11 who want to be a part of a general meeting will
12 have to sign in.

13 That shows they are a UTM
14 student which would make them eligible to
15 participate within that club's event whether it is
16 a general meeting or just a social event or
17 activity.

18 124 Q. That right to participate
19 includes a right to joint even in that club's
20 elections?

21 A. If that is what it states
22 within that club's constitution that allows them
23 to do that, yes.

24 125 Q. Specifically, you have
25 reviewed the constitution of the SFL; correct?

1 A. Yes.

2 126 Q. Do you know if that
3 club's constitution permits people to show up and
4 vote regardless of whether they are interested in
5 supporting that club's mandates or activities?

6 A. I can't specifically
7 recall what it specifically says within the
8 Students for Life constitution. I do remember it
9 was open to the general public in terms of, like,
10 UTM students. If I remember correctly, there
11 wasn't no restrictions.

12 127 Q. If there are no
13 restrictions, it is your position that even
14 members opposed to SFL could vote in SFL's
15 elections and that vote would be valid under the
16 Clubs' handbook?

17 A. Yes.

18 128 Q. Do you recall ever
19 telling SFL that they had to put up posters and
20 advertise their meetings?

21 A. Yes.

22 129 Q. Since SFL's status had
23 been revoked or they weren't granted club status,
24 they would have had to pay for those posters;
25 correct?

1 A. Yes.

2 130 Q. They would have had to
3 pay to post them on the student union bulletin
4 boards?

5 A. Yes.

6 131 Q. We have already gone over
7 the fact that the five individuals who I will
8 name -- Salma Fakhry, Taman Khalaf, Ariana
9 Serapigia, Hashim Yussuf, Nyasha Chikowore -- that
10 these individuals were all students at UTM and
11 some of these individuals also had roles within
12 the UTMSU. How do you know those five individuals
13 that I just named -- you know the individuals I am
14 referring to; correct?

15 A. Correct.

16 132 Q. How do you know those
17 individuals?

18 A. Some of them are
19 colleagues in regards to, like, us working within
20 the student union. A few of them hold positions
21 within the union, whether it is, like, being an
22 associate, a coordinator, sitting on the board.
23 Some of them I just know through passing, like
24 "Hi," "Bye," "How are you doing?"

25 133 Q. Some of them might be

1 your friends. Would that be correct to describe
2 them as?

3 A. Yes.

4 134 Q. Some of them are more of
5 acquaintances and less of close friends?

6 A. Yes.

7 135 Q. But you have had
8 discussions with all of these people about SFL at
9 one point or another?

10 A. Not all of those people
11 who are start stated in the affidavit.

12 136 Q. How did these individuals
13 find out about SFL's November 23rd meeting?

14 A. A few of them already got
15 wind of the issues surrounding the club. They
16 came to me whether they had, like, any issues,
17 concerns. Then I let them know or basically
18 directed them that "There is a general meeting
19 coming up at this date. If you folks feel a
20 certain way that would be the perfect space to
21 raise those issues and concerns."

22 It was a general meeting;
23 right? A club is having a meeting with their
24 general membership. If they had any issues they
25 wanted to bring forward to the table that would be

1 the perfect space to discuss it.
2 137 Q. Were you aware if any of
3 these individuals were supporting the right of SFL
4 to -- supported SFL's application to have student
5 group status? Did any of these individuals want
6 SFL to be approved as a student club?
7 MS. WOOD: Do you know?
8 THE WITNESS: I do not know.
9 I can't recall it.
10 MR. MOORE:
11 138 Q. Did any of these
12 individuals express opposition to SFL?
13 A. From the people that came
14 to me, yes.
15 139 Q. Then you invited them to
16 make those concerns heard at the meeting that was
17 scheduled for November 23rd; correct?
18 A. Correct.
19 140 Q. Were you surprised when
20 the individuals indicated that they would vote at
21 that meeting?
22 A. No. Before the meeting
23 started, they had asked everyone to sign in which
24 kind of indicated that, during this general
25 meeting, they would have the right to vote.

1 141 Q. Were you surprised that
2 individuals that had expressed concerns in
3 opposition to SFL would want to vote at SFL's
4 meeting and in their election?
5 A. No.
6 142 Q. Has that happened before
7 where individuals opposed to a club have decided
8 to vote in that club's elections even if they are
9 opposed to that club's existence?
10 A. If they are allowed to in
11 regards to what is stated within the club's
12 constitution -- I just forgot the question.
13 143 Q. Does it seem -- sorry.
14 A. Can you just repeat the
15 last question?
16 144 Q. Could you repeat the last
17 question?
18 --- Readback provided.
19 THE WITNESS: Yes.
20 MR. MOORE:
21 145 Q. Do you know of which
22 situations that has happened before?
23 A. I can't specifically
24 recall which general meetings that has happened
25 because when -- we have over 100 recognized clubs.

1 I am not going to know, for the most part,
2 everyone's true intentions going into the general
3 meeting, even if they are opposed to that club.
4 146 Q. If a club is aware that
5 people opposed to their existence are wanting to
6 vote in the elections of that club, how should a
7 club -- how can a club at UTMSU protect itself
8 from having people opposed to its existence vote
9 in its elections?
10 A. I am not sure. I have to
11 double check in regards to the Clubs' handbook if
12 it allows them to, like, either reschedule the
13 general meeting beforehand. For the most part, if
14 it is stated in the constitution where there is,
15 like, no restrictions and it gives UTM students
16 who are not -- haven't been a member in the club
17 prior -- that gives them the luxury to vote in
18 their club's general meeting, then there is
19 nothing that could really be undone per se. I am
20 pretty sure that clubs could, like -- if I am
21 correct -- could, like, either reschedule the
22 general meeting.
23 147 Q. But if a group of
24 individuals opposed to the existence of a club
25 elected their own executives to be the executives

1 of that club, there wouldn't be much that club
2 could do about it after that, would there be?
3 A. Could you rephrase the
4 question, please?
5 148 Q. If a group of individuals
6 opposed to the existence of a club nominated and
7 elected their own people to be executives on that
8 club that they are opposed to, the other members
9 of that club wouldn't be able to do much about it
10 at that point, would they?
11 A. It really depends on the
12 club's constitution. If there was a group that
13 was opposed to the club and they wanted their own
14 people elected, they will have to go through a
15 process for that to happen.
16 149 Q. All right. Do you know
17 if the five individuals who attended the November
18 23rd meeting indicated that they wanted to join
19 the club as members? Did they state they wanted
20 to become members of SFL?
21 MS. WOOD: Are you asking if
22 they told him?
23 MR. MOORE:
24 150 Q. Did they tell you, or did
25 you see them state that they wanted it become

1 members of SFL?
2 A. They didn't tell me they
3 wanted to become members of Students for Life.
4 151 Q. Did they tell SFL they
5 wanted become members of --
6 A. I can --
7 REF MS. WOOD: He is not going to
8 know.
9 MR. MOORE:
10 152 Q. At the meeting that you
11 were there, did you hear them tell SFL they wanted
12 to become members?
13 A. I can't recall, like,
14 unless they had a conversation with Students for
15 Life.
16 153 Q. Are you aware if those
17 individuals have become members of SFL?
18 A. I wouldn't be aware if
19 they became members. They did sign in prior,
20 before that general meeting, so technically, they
21 are members.
22 154 Q. Just by signing in, they
23 are members?
24 A. Yes. That would allow
25 them to vote in their general meeting.

1 155 Q. All right. If the
2 individuals wanted to become members for the
3 purposes of the Clubs' handbook -- I will just
4 direct your attention to page 121 of Exhibit E
5 which is in the Clubs' handbook.
6 If they wanted to become
7 members of SFL for the purposes of the Clubs'
8 handbook, would they not have to provide their
9 e-mail to the club? Here at page 121, it states
10 that "Members of the club are informed and invited
11 through mass e-mail." (As read.)
12 A. Yes. That is one way in
13 terms of, like, invited members; right? Whenever
14 clubs are doing an event or even a general
15 meeting, one way is to send a mass e-mail to the
16 membership list they already have.
17 If they also want to get more
18 people out to their event, they would also put up
19 posters, create a Facebook event page, different
20 platforms to create more awareness for their
21 event. That is one way.
22 In terms of membership, yes,
23 that would be in terms of, like, sending mass
24 e-mails to the membership list already, but also,
25 students could also attend the general meetings or

1 events if they hear about it, as well. It is not
2 just closed off to club members.
3 156 Q. If individuals refuse to
4 provide their e-mails to a club, does that
5 indicate that they don't want to be members of
6 that club and be kept informed?
7 A. No.
8 157 Q. If an individual doesn't
9 provide his e-mail to a club, can that club use
10 that individual's name on their list of members in
11 their applications to UTMSU for club recognition?
12 A. No. They would need
13 their full name, student number, e-mail, I think
14 UTor ID. I think, if I remember, that is the main
15 things. They need their e-mail, but if students
16 that don't want to, like, provide their e-mail,
17 there are different ways clubs could get in
18 contact with them.
19 It is up to the student
20 personally what they feel comfortable with; right?
21 If they feel comfortable, like, receiving
22 messages, I guess, via phone -- and you do collect
23 phone numbers within the membership list. There
24 are two ways of kind of going about it. You can
25 either send a mass e-mail to your membership or a

1 mass text to your membership.
2 158 Q. All right. You can't use
3 those individuals who refuse to provide their
4 e-mail or other numbers to you -- you can't use
5 them to apply for club recognition?
6 A. Yes. If they don't
7 provide with e-mails -- like, either-or, either a
8 way in terms of being able to contact. Those
9 names would be considered invalid. We also have
10 do our duty to make sure those students are UTM
11 students. In our policies, it says that you need
12 at least 25 signatures from UTM students.
13 159 Q. Those individuals,
14 regardless of whether they provided that
15 information, that contact information to the club,
16 they can vote in that club's elections; correct?
17 A. Yes. Due to their
18 constitution they have within their club.
19 160 Q. Were you aware that SFL
20 has not had access to their e-mail account since
21 December 2015?
22 A. Yes.
23 161 Q. Do you know why they
24 haven't had access to their e-mail account since
25 then?

1 A. They are not a recognized
2 club.
3 162 Q. Did you indicate that
4 they shouldn't have access to their e-mail
5 account?
6 A. No.
7 163 Q. But you told someone in
8 UTMSU that they are not a recognized club so they
9 should have their e-mail account revoked then?
10 REF MS. WOOD: I don't think he
11 said he directed that. He just said that he knew.
12 MR. MOORE:
13 164 Q. Did you tell SFL that
14 they wouldn't have access to their e-mail account,
15 their UTMSU e-mail account?
16 A. Did I indicate? No.
17 165 Q. Did somebody tell you
18 that they would lose their access to their e-mail
19 account, or did you tell someone to take away
20 access to their e-mail account?
21 A. I can't recall when their
22 UTMSU e-mail account kind of was, like,
23 deactivated in regards to that. If a club is not
24 recognized under UTMSU, like, privileges that come
25 with a recognized club is stripped.

1 With them not being recognized
2 at that moment of time, they are not a recognized
3 club. They won't be able to get access to their
4 e-mails. They won't be able to book space. They
5 won't be able to put up posters unless they pay
6 for the space or unless they want to have a
7 general meeting within the student centre. They
8 would have to, like, pay for the space because
9 they are not a recognized club in the UTMSU.
10 166 Q. All right. Have you --
11 just referencing paragraph 5 of your affidavit,
12 and the statement that you had concerns that SFL's
13 mandate did not comply with UTMSU's policies, have
14 you had any concerns that other clubs' mandates
15 don't comply with UTMSU's policies?
16 A. As my position as Campus
17 Life -- in regards to my term, no. In terms of
18 mandate, no.
19 167 Q. No concerns that the
20 Baptist Student Ministries or Women and Gender
21 Studies Action Group, UTM Conservatives, UTM Agape
22 Impact -- none of those clubs? You haven't had
23 any concerns that their mandates don't comply with
24 UTMSU's policies?
25 A. No.

1 MR. MOORE: Off the record.
2 --- Recess taken at 3:20 p.m.
3 --- Upon resuming at 3:31 p.m.
4 MR. MOORE:
5 168 Q. I will direct your
6 attention to paragraph 6 of your affidavit. You
7 indicate there that you spoke with Jason
8 Selvanayagam?
9 A. Yes. I have a tough time
10 pronouncing that, too.
11 169 Q. About SFL's application.
12 What did you talk with him about? What concern
13 did you raise with Jason in that conversation?
14 A. As you know, me and
15 Jason -- Jason is the Clubs Coordinator. We go
16 through all of the club re-recognition and new
17 club recognition; right? Once we got to SFL's
18 application, it was the mandate and how, like, the
19 issue with this club -- just in regards to,
20 like --
21 As I said earlier, the issues
22 that was raised through conversations or just
23 hearing people voice their opinions about it, it
24 was something that we wanted to take it to Clubs
25 Committee to get more consultation on it in terms

1 of, like, what should we do. Me especially --
2 this being like my first task under the Campus
3 Life portfolio, I wanted to make sure we went
4 about it in the right way.
5 170 Q. Jason echoed or shared
6 your concerns with the SFL application, as well?
7 A. Yes.
8 171 Q. He had heard complaints
9 and concerns about SFL before?
10 A. Yes.
11 172 Q. Was Jason familiar with
12 the Clubs Committee process before -- he had been
13 in his role before you had been in your role as
14 campus VP?
15 A. No. We are both new to
16 those positions. Just like me, that was his first
17 time in the Clubs Coordinator role.
18 173 Q. You both shared concerns
19 about SFL's application, so you treated it special
20 because of those concerns and sent it to the Clubs
21 Committee?
22 A. Yes.
23 174 Q. Whereas other clubs, they
24 had issues with their discrepancies in their
25 documents addressed, this application was

1 different. SFL's application was different. You
2 sent to the Clubs Committee for special review;
3 correct?
4 A. Yes.
5 175 Q. Has Jason continued to
6 have a role in the process through the attempted
7 appeal of this decision not to give them club
8 status?
9 A. Yes. Just in regards to
10 his role as being part of the Clubs Committee,
11 like, sitting on it, he can sit on Clubs
12 Committee, but if we go into in-camera, he can't
13 sit on it because he is not like an elected member
14 within the Clubs Committee to sit in-camera.
15 Besides that, that is, like,
16 basically his only role he has to play in terms of
17 providing some form of consultation in regards to
18 the status of Students for Life's re-recognition
19 package.
20 176 Q. His concern was and
21 likely continues to be that SFL's mandate does not
22 match up with UTMSU's standpoint?
23 A. Jason's concerns?
24 177 Q. Jason's concerns.
25 MS. WOOD: Do you know?

1 THE WITNESS: I do not.
2 MR. MOORE:
3 178 Q. Was that his concern
4 originally?
5 A. Yes. In regards to the
6 conversation, we had when we were going through
7 the re-recognition process.
8 179 Q. That he was concerned
9 about their mandate being pro-life and not
10 matching up with UTMSU standpoints?
11 A. Yes.
12 180 Q. I am directing your
13 attention to paragraph 13. You state in the
14 middle sentence that:
15 "These individuals are
16 all involved with UTMSU
17 student groups and had
18 heard of the November
19 23rd meeting through
20 conversations between me
21 and other UTMSU staff."
22 (As read.)
23 Does that mean that the five
24 individuals listed in paragraph 13 had been
25 involved in those conversations that you had had

1 with UTMSU staff concerning SFL's student group
2 status?
3 A. UTMSU's staff? I can't
4 recall. In regards to -- are you saying, like,
5 UTMSU as in UTMSU executives or just staff?
6 181 Q. I am not exactly sure.
7 Just in the second to last sentence in paragraph
8 13, that is what I am referencing.
9 MS. WOOD: I think what he is
10 asking is when it says, "conversations between me
11 and other UTMSU staff," (As read.) were you and
12 the UTMSU staff together in these conversation or
13 were they having conversation with you and
14 conversations with UTMSU staff?
15 THE WITNESS: Having
16 conversations with me and UTMSU staff.
17 MR. MOORE:
18 182 Q. All right. What was the
19 nature of those conversations to your knowledge?
20 A. The conversations I had
21 with the individuals who came to me, it was just
22 more that they were having issues or concerns
23 because they already heard about the issues
24 surrounding Students for Life in terms of, like,
25 their mandate and what the club stands for.

1 That was basically their
2 conversation in terms of, like, kind of just
3 voicing how they felt about the club. As I stated
4 earlier, I told them that I can't provide the
5 answers they desire or they require. If they want
6 to raise any issues or concerns, they should bring
7 it up at Students for Life's general meeting.
8 183 Q. Who were the individuals
9 who had those conversation directly with you?
10 A. Taman and Salma.
11 184 Q. The other three
12 individuals had had those conversations with other
13 UTMSU staff?
14 A. I believe so.
15 185 Q. To the best of your
16 knowledge?
17 A. Yes. They heard it
18 through UTMSU staff.
19 186 Q. To your knowledge, they
20 had expressed concerns to other UTMSU staff about
21 SFL, as well?
22 A. Can you rephrase the
23 question?
24 187 Q. The three individuals who
25 hadn't talked to you personally, to your

1 knowledge, they also expressed concerns about SFL?
2 A. I wouldn't recall because
3 I didn't have those conversations. I didn't hear
4 about them having conversations with other UTMSU
5 staff members. If they did, I wasn't aware of it.
6 I probably didn't know they were -- they kind of
7 knew about the issue probably until, like, the day
8 of.
9 188 Q. You were aware that these
10 individuals had questions about SFL according to
11 the last sentence of paragraph 13. Is that
12 correct?
13 A. What was the question?
14 Just confirming the last sentence?
15 189 Q. Yes. You were aware that
16 these individuals had questions to ask members,
17 SFL members?
18 A. Yes. The individuals I
19 spoke to.
20 190 Q. What were the questions
21 that Salma had to ask SFL members? Do you recall?
22 A. I can't recall
23 specifically what she basically asked me or in
24 terms of -- specifically, I can't recall the
25 actual questions they had, but it was just to kind

1 of put it, like, in a vague bubble, it was issues
2 in terms of like their mandate.
3 191 Q. In terms of their
4 mandate?
5 A. Yes. Like, basically --
6 the conversation with Salma and Taman -- the
7 conversation we had, they were expressing the fact
8 that they felt that, you know, as a woman, women
9 should have the right to do what they please with
10 their own body. It is their decision to make.
11 Then they also expressed the
12 fact there were not comfortable because, like,
13 certain executives that sat on the Students for
14 Life executive team -- some were male. Those were
15 the same males who were expressing viewpoints
16 about being pro-life.
17 They felt -- they weren't
18 comfortable with that because how can a guy make
19 those statements. I don't know if it was like
20 during their meetings or any conversation they had
21 in passing. I don't know what -- how they --
22 where those things kind of lie.
23 They didn't feel comfortable
24 with, like, people sitting on the executive board
25 making statements which made them feel

1 uncomfortable from a woman's point of view.
2 I told them, "If you folks
3 feel that strongly about it, you should go to the
4 general meeting; right? I don't have the answers.
5 They have the answers for you because they are the
6 executives of that club. That is the mandate that
7 they stand by; right? If that is the case, they
8 should be able to tell you the reason why, you
9 know, and be able to provide them with an answer."
10 192 Q. Did you make them aware
11 that they are actually going to have an election
12 at the club meeting on the November 23rd for new
13 executives or at least one new executive?
14 A. They were aware there was
15 an election going on because I did give them a
16 brief rundown, like, this is how their general
17 meeting is set up in regards to the agenda. So
18 they wanted to know, like, within the agenda what
19 would be the perfect space to raise those issues
20 or concerns.
21 193 Q. Did they raise those
22 issues and concerns at that election meeting or at
23 the November 23rd meeting?
24 A. On the Students for Life
25 agenda, there wasn't really, like, a space for

1 them to raise those issues. They raised it during
2 the first item which was, like, electing the
3 fourth executive. I am trying to remember.
4 I can't remember if it was
5 Salma in regards to, like, the -- yes. They
6 brought it up prior because it wasn't an actual
7 space within the agenda to discuss about it.
8 There was a brief discussion about it.
9 They wanted to get to the
10 voting of the fourth executive. Once that
11 happened and the motion had failed, they didn't
12 discuss about those things after.
13 194 Q. How did they bring up
14 their issues within the meeting? Did they just
15 talk to SFL about it after the meeting was called
16 to order, or how did they bring it up?
17 A. I can't recall how they
18 brought it up.
19 195 Q. All right. Did they
20 specifically raise the issue of men making
21 decisions about and taking positions on the
22 question of abortion? Did they raise that at the
23 meeting?
24 A. No.
25 196 Q. What did they raise at

1 the meeting then?
2 A. What they raised in the
3 meeting was their stance of being a pro-life club.
4 They didn't focus their attention on the men in
5 regards to their viewpoint on abortion or being a
6 pro-life club. It was more, like, in general. So
7 as the club as a whole.
8 197 Q. They raised their concern
9 just with the club being pro-life and that stance.
10 It is just that stance is general -- they had
11 concerns about the pro-life?
12 A. Yes.
13 198 Q. How did SFL respond to
14 that?
15 A. I can't remember how they
16 specifically responded, but they did give them a
17 response.
18 199 Q. Did SFL indicate that
19 they -- you don't recall how they specifically
20 responded, just that they responded to that
21 concern?
22 A. I am just trying to
23 remember, like, what they specifically said. I
24 think it was around the lines of -- yes. I think
25 it was around the lines of the fact that basically

1 they felt that the right -- like, within their
2 stance, they should protect the rights of people
3 in their position -- everyone has a right to life.
4 Something like that in terms
5 of, like, basically kind of bounding the fact that
6 every person or human has a right to life. That
7 was their response. I can't specifically remember
8 if it was, like, the general --
9 200 Q. All right. Then that
10 discussion end with SFL's response, or did it
11 continue?
12 A. It ended.
13 201 Q. After that, then there
14 was a vote taken for the executive of SFL?
15 A. Yes. They moved to the
16 motion to elect the fourth executive. So they did
17 it through secret ballot. People either wrote, I
18 guess, "yes" or "no" on the thing. I didn't vote.
19 I abstained from it just to the fact, like, to not
20 cause --
21 Me being VP Campus Life, I had
22 to oversee the whole thing. I felt it wasn't in
23 my best interest to vote on this. Two -- yes,
24 and -- sorry. Then two, I didn't want to
25 influence, like, the vote in any formal way within

1 that capacity.
2 202 Q. All right. But Salma and
3 Taman you know voted in that election?
4 A. Yes.
5 203 Q. The other three
6 individuals listed in paragraph 13 voted, as well?
7 A. Yes.
8 204 Q. Did you count the votes?
9 A. I didn't count the votes,
10 but I was the scrutineer. It wasn't the other
11 individual. I forgot his name.
12 205 Q. Cameron Grant?
13 A. Yes. He counted the
14 votes.
15 206 Q. You supervised the count
16 of the votes?
17 A. Yes.
18 207 Q. You indicated that after
19 the vote there was further discussion. These five
20 individuals listed in paragraph 13, they had
21 further discussion with SFL about their concerns
22 with the club?
23 A. Yes.
24 208 Q. What was the nature of
25 that discussion?

1 A. Their further
2 discussion -- the conversation started where
3 Cameron asked how can we -- like, for next time,
4 because they actually -- they asked me what went
5 wrong with the elections, like, what happened and
6 stuff like that and why they felt people in the
7 room had voted it down; right?
8 Then I told them there
9 wasn't -- yes. "You folks didn't really promote
10 your event; right? So it makes it seem that you
11 just hand-picked someone just to elect the fourth
12 executive so you can approve the discrepancies
13 within your first constitution; right?"
14 It was kind of more like I was
15 protecting them. The thing is, like, you have a
16 membership which is needed for recognition of 75
17 members within your club and only three executives
18 showed up including the fourth that was about to
19 be elected; right?
20 It kind of makes it look like
21 that did you really contact your membership
22 because I was not CCing these e-mails in regards
23 to those e-mails that was supposedly sent to the
24 member ship. I don't remember seeing a poster.
25 We were in direct contact with

1 each other. They never once stated, "We have
2 created posters we want to put up around campus";
3 right? It was something where they had, say,
4 financial difficulties or something like that of
5 not being able to have the funds to pay for the
6 posters.

7 We could assist them with that
8 because I booked the room personally with no cost.
9 That was the same way those folks echoed. They
10 were just saying they were unaware of the club in
11 terms of, like, them having a general meeting
12 prior hand to elect the fourth executive. Two,
13 their stance in regards to what they believe in in
14 terms of the club being a pro-life club.

15 209 Q. That was expressed by the
16 five other individuals at the meeting there who
17 are listed in paragraph 13?

18 A. Not all of them, but the
19 individuals.

20 210 Q. Some of them expressed --

21 A. Yes.

22 211 Q. -- that they hadn't been
23 too much aware of the club --

24 A. Yes.

25 212 Q. -- meeting, and they also

1 expressed concern with the club's pro-life
2 mandate?

3 A. Yes.

4 213 Q. Was there any further
5 discussion?

6 A. Yes. Just I was letting
7 them know that "You folks could hold another
8 general meeting again in the winter which will
9 give you more time. I am willing -- I am open to
10 help assist you folks in anything I can," because
11 I had already been helping them out in terms of
12 anything they needed done, like, if they needed me
13 to book a room.

14 Originally, we had another
15 date. The one that happened on the 23rd was
16 actually rescheduled because one of their -- the
17 one that was going to be elected for the exec
18 wasn't able to make it to the last one. I
19 accommodated for that. I had to, like, work
20 around my schedule so they would have the space to
21 hold that meeting.

22 I told them, like, this is not
23 a bad thing. "Don't feel discouraged in any way.
24 Basically, what you need to do is just, like,
25 contact your membership and let them know that you

1 have this really huge general meeting up in the
2 winter. You decided to hold a general meeting.
3 Get most of your membership there. Or even put
4 posters up to get students plugged in and aware
5 about it. When you have your next general meeting
6 in the winter, you can have a bigger turn out so
7 folks can be plugged in and know what is
8 happening."

9 That was kind of, like, the
10 conversation because the people, I guess, who
11 voted down, they weren't aware of what was
12 happening. They didn't feel comfortable voting
13 "yes."

14 214 Q. Are you aware of -- would
15 you say that the majority of students at UTMSU
16 oppose SFL's pro-life views? Would you say that
17 is an accurate statement?

18 A. I wouldn't know.

19 215 Q. Would you say that the
20 concerns that you heard about SFL are shared by a
21 lot of other students at UTMSU?

22 MS. WOOD: What do you mean
23 by "a lot"?

24 MR. MOORE: I don't know.

25 216 Q. Would you say that the

1 concerns that you heard were shared by a lot of
2 other students at UTMSU?

3 A. I wouldn't know because I
4 don't know what "a lot" is. I have heard
5 concerns; right? Me personally, that is a few. I
6 don't know what is the general consensus in terms
7 of, like, how everyone feels about this particular
8 club.

9 217 Q. Have you heard students
10 come up to you and say they support SFL other than
11 SFL members?

12 A. No -- I can't recall, but
13 I can't remember if they have come out to me
14 saying they support. I am pretty sure no.

15 218 Q. Just one final question,
16 are you sure that there are written policies that
17 govern an appeal process after a club's
18 decision -- the Clubs Committee makes a decision
19 to deny student group status? Are you sure there
20 are written policies for that?

21 A. Can I --

22 MS. WOOD: You absolutely can.

23 THE WITNESS: I know that a
24 club has the right to an appeal.

25 MR. MOORE:

1 219 Q. Do you know if that is a
2 written policy or if there are any other further
3 written policies that govern that right to appeal?

4 MS. WOOD: Are you looking for
5 the Clubs' handbook? The Clubs' handbook is at
6 Exhibit E.

7 THE WITNESS: I am pretty sure
8 it is either stated in the Clubs' handbook or the
9 Clubs' policy because I know they have the right
10 to appeal a decision.

11 MR. MOORE:

12 220 Q. All right. But it may or
13 may not be a written policy describing what
14 happens in an appeal of that decision?

15 A. I am pretty sure there is
16 a policy in regards to being able to appeal the
17 decision that has been made by the Clubs
18 Committee.

19 221 Q. All right. You can't
20 point to that? As you sit here right now, you are
21 not aware specifically of where that is located?

22 MS. WOOD: Counsel, I am happy
23 to take an undertaking and point to that or
24 correct the record as necessary.

25 MR. MOORE: All right. I will

1 accept that undertaking then. If you have an
2 undertaking to correct --
3 U/T MS. WOOD: I will undertaking
4 to provide you with the specific location in a
5 written policy that allows for a Clubs Committee
6 reconsideration of a denial of a club's status or
7 to correct the record and state that there is a
8 standard practice of the Clubs Committee to
9 reconsider applications but that it is not
10 actually a written policy.

11 MR. MOORE: All right. Thank
12 you. I have no further questions at this time.
13 As we discussed before, I won't be closing the
14 questioning right now.

15 MS. WOOD: Understood.

16 MR. MOORE: For today, I have
17 no further questions.

18 MS. WOOD: Thank you.

19 --- Whereupon the proceeding adjourned at
20 3:58 p.m. sine die

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A	Adade's 12:22	23:24 24:6,14	52:25	64:5 67:25
A.S.A.P 1:22	additional 29:25	24:25 25:6,13	attended 50:17	68:5 72:24
abide 33:11	address 11:2	25:14 26:7,10	attention 4:22	batch 31:11
ability 77:4	addressed 20:4	59:7 74:17,24	6:9 17:3 19:24	Bay 1:12,23
able 31:12 32:17	32:12 58:25	75:3,10,14,16	19:24 32:13	becoming 5:17
33:17 35:15	adhere 37:5	appealing 23:10	36:21 52:4	6:6
37:13 50:9	adjourned	APPEARAN...	57:6 60:13	Beginning 37:2
54:8 56:3,4,5	76:19	1:15	67:4	begins 17:8
65:8,9 71:5	administration	appears 20:21	audit 26:13,17	behalf 1:16,18
72:18 75:16	5:14,16	Applicants 1:6	26:19,24 28:3	believe 18:13
abortion 13:17	advertise 44:20	1:16	28:10	22:2 62:14
20:15 66:22	affidavit 1:10	application 3:23	August 14:1,8	71:13
67:5	6:10 12:13,15	4:3,10 7:11	14:18 16:4,25	believing 22:3
abortions 19:6	13:7 19:8	9:20,24 10:15	20:20 21:2,10	benefits 40:17
absolutely 74:22	21:13 26:12	11:21 14:7,19	automatically	best 62:15 68:23
abstained 68:19	27:25 30:2	37:3 47:4	35:7 40:9	77:3
academic 17:12	36:22 46:11	57:11,18 58:6	aware 8:11 9:24	bias 39:10
18:14	56:11 57:6	58:19,25 59:1	10:14 19:9	bigger 73:6
accept 32:17	affiliation 4:23	applications	22:10 23:17,22	binding 3:13,20
76:1	7:3	32:9 33:22	24:13,22 25:4	board 12:16,22
access 54:20,24	afternoon 3:6,8	53:11 76:9	25:11 35:11,25	13:8 20:22
55:4,14,18,20	Agape 56:21	applied 26:20	39:4 47:2 49:4	21:3,14 22:4
56:3	agenda 65:17,18	applies 37:15	51:16,18 54:19	22:12 23:18,23
accessible 40:6	65:25 66:7	39:16	63:5,9,15	24:24 25:5,13
accommodated	Alan 1:17	apply 37:11 54:5	65:10,14 71:23	45:22 64:24
72:19	Alexi 1:18	approve 70:12	73:4,11,14	boards 45:4
account 54:20	aligned 38:12	approved 47:6	75:21	bodies 17:20
54:24 55:5,9	allow 51:24	Ariana 45:8	awareness 9:12	18:20 19:20
55:14,15,19,20	allowed 24:9	article 38:4	52:20	20:10
55:22	25:8 48:10	ASAP 1:11		body 17:25
accurate 73:17	allows 40:18,18	asked 30:5	B	64:10
accurately 77:4	43:22 49:12	47:23 63:23	back 8:18 21:9	book 36:12 56:4
acquaintances	76:5	70:3,4	24:7 31:23	72:13
46:5	alongside 26:25	asking 14:17	34:7	booked 71:8
Action 56:21	amount 41:3	50:21 61:10	bad 72:23	bounding 68:5
activities 42:5	answer 24:2	assist 71:7 72:10	ballot 68:17	break 36:14,16
44:5	65:9	assisting 33:6	Baptist 56:20	brief 65:16 66:8
activity 43:17	answered 29:22	associate 45:22	based 26:2	bring 10:20
actual 16:18	answers 3:13,20	associated 30:14	41:22	46:25 62:6
39:14 63:25	62:5 65:4,5	assuming 28:1	basically 9:13	66:13,16
66:6	anyway 26:7	33:21	10:6 18:23	bringing 30:3
Adade 2:4 3:4,7	apologies 8:23	Athletic 5:14	19:4 33:11	brought 19:23
3:11 8:14,24	13:1	attempted 59:6	40:15 41:16	20:2 32:12
18:18 20:7	appeal 21:8	attend 33:25	46:17 59:16	66:6,18
22:17 36:21	22:13,25 23:19	34:10,14 41:2	62:1 63:23	bubble 64:1

budgets 31:17	Christopher	37:6 39:9,25	75:5,5,8,9	26:13,19 27:8
bulletin 45:3	77:12	42:11,16 43:15	colleagues 45:19	28:3
bunch 4:5	clarify 18:15	43:19,22 44:3	collect 53:22	concern 7:15
business 35:17	close 46:5	44:5 48:8,9,11	collective 15:11	57:12 59:20
Bye 45:24	closed 53:2	49:18 50:12	come 19:14	60:3 67:8,21
<hr/>	closing 76:13	54:16 72:1	24:10 55:24	72:1
C	club 4:1,7,8,10	74:17 76:6	74:10,13	concerned 6:14
called 66:15	4:13,15,17,19	clubs 4:5 5:9,25	comes 17:25	6:20 7:10,15
Cameron 1:5	4:24 5:12,12	9:10 10:2	comfortable	11:6,11 12:10
69:12 70:3	6:23 7:2 9:11	11:20 12:2,8	9:14 53:20,21	60:8
campus 4:6 5:2	9:12,25 10:3,5	14:2,5 15:10	64:12,18,23	concerning 5:24
5:9,11,18,20	10:10,10,18,19	16:9 20:23	73:12	23:9 28:8
5:25 6:7 7:19	14:19 15:5,14	21:4,9 22:5,11	coming 34:7	42:18 61:1
9:8 10:1 26:14	15:18,22 16:5	23:1,10,19	46:19	concerns 8:8
29:2,8 30:8	16:6 19:5,6,23	24:7,9,10,25	commencing 3:2	10:16,19,21,22
34:17 38:25	20:18,24 23:11	25:6,9,14,17	comments 24:2	11:3 20:2,18
39:12,13 56:16	32:16 33:15,17	25:23 26:6	Committee	46:17,21 47:16
58:2,14 68:21	35:7,16,23	27:1,5 28:16	11:20 12:2,8	48:2 56:12,14
71:2	36:5,9 37:13	28:21 29:3	14:2,6 15:11	56:19,23 58:6
capacity 19:3	38:23 39:8,20	30:9 31:7,8,9	16:9 20:23	58:9,18,20
69:1	39:21,22,23	31:13,23 32:4	21:5,9 22:5,12	59:23,24 61:22
Caribbean 5:12	40:2,4,17,21	32:5,6,8,11,20	23:1,10 24:7,9	62:6,20 63:1
carry 35:16	41:6,8,10,13	32:25 33:1,2,4	24:11 25:6,9	65:20,22 67:11
case 24:10 65:7	41:15,18,21,22	33:6,10,18,20	25:14,17,23	69:21 73:20
cause 68:20	42:5,8,9,20,24	33:22 34:2,3,4	26:7 28:17,22	74:1,5
caused 14:22	43:2,4,7,10	34:9,14,15	31:13 32:20,25	CONDENSED
CCing 70:22	44:23 46:15,23	37:4,6,8,10,10	33:1,2,18,20	1:14
centre 56:7	47:6 48:7 49:3	37:11,16,19	37:10 57:25	confirm 3:12,19
certain 4:14	49:4,6,7,7,16	38:1,8,11,14	58:12,21 59:2	confirming
31:9 46:20	49:24 50:1,1,6	38:24 39:2,5	59:10,12,14	63:14
64:13	50:8,9,13,19	39:10,17 40:12	74:18 75:18	conflating 29:21
CERTIFY 77:3	52:9,10 53:2,4	40:23,25 48:25	76:5,8	conflict 17:15
CFS 7:3,5,23 8:4	53:6,9,9,11	49:20 52:14	Committee's	39:10
CFS's 7:5	54:5,15,18	53:17 56:22	23:19 24:25	conflicted 6:25
CHAD 1:5	55:2,8,23,25	57:15,24 58:12	complaints	conflicting 7:6
changed 22:17	56:3,9 57:16	58:17,20,23	10:12 20:2	16:11
22:19	57:17,19 59:7	59:2,10,11,14	58:8	confused 12:20
changes 32:19	61:25 62:3	74:18 75:17	complete 31:2	connect 10:9
33:4,8,12	65:6,12 67:3,6	76:5,8	complied 10:17	Connection 5:12
34:10,11,16	67:7,9 69:22	clubs' 23:15,15	comply 6:15,20	conscience 3:14
35:2 38:14	70:17 71:10,14	33:9 35:11,22	7:10,16 37:20	consensus 74:6
check 8:17	71:14,23 74:8	36:7,7,23,25	38:15 56:13,15	Conservatives
35:10 49:11	74:24	37:10 38:16,20	56:23	56:21
Chikowore 45:9	club's 14:24	44:16 49:11	complying 8:2	considered 54:9
Chris 8:16	15:1 17:14	52:3,5,7 56:14	comprehensive	constitute 41:25

42:9 constitution 17:14 26:3 33:5 34:10,12 34:16 35:3 38:1,5,8,11 39:25 40:22 41:16,21,22 42:11,11,17,21 42:24 43:4,22 43:25 44:3,8 48:12 49:14 50:12 54:18 70:13 constitutional 28:15,19 29:20 30:1,25 38:3,9 constitutions 31:20 38:12 consultation 24:17 57:25 59:17 contact 53:18 54:8,15 70:21 70:25 72:25 continue 68:11 continued 59:5 continues 59:21 conversation 4:20 9:6 14:14 14:14 18:24 20:17 51:14 57:13 60:6 61:12,13 62:2 62:9 64:6,7,20 70:2 73:10 conversations 4:12 57:22 60:20,25 61:10 61:14,16,19,20 62:12 63:3,4 coordinator 27:1 29:4 30:10 34:14 38:25 39:3,13	45:22 57:15 58:17 copy 38:3 correct 6:16 11:13,21,22,25 12:1,5,12 14:3 17:1,6 21:15 21:19,21,23 22:6 28:4,13 29:14 30:21,22 30:24 31:3,18 35:5,6 43:25 44:25 45:14,15 46:1 47:17,18 49:21 54:16 59:3 63:12 75:24 76:2,7 correcting 32:22 correctly 6:17 8:5 13:23 18:6 18:10 20:7,13 39:1 41:5 44:10 cost 40:16 71:8 Council 5:14 Counsel 75:22 count 69:8,9,15 counted 69:13 couple 31:24 Court 1:1,3 77:12 create 34:23 38:11 39:9 52:19,20 created 9:16 40:1,22 71:2 creating 9:12,14 38:8 CRO 39:6,14 CROSS-EXA... 1:10 2:5 3:5 CV-16-544546 1:1 <hr/> D <hr/>	date 15:25 46:19 72:15 day 63:7 deactivated 55:23 deadline 31:7 32:9 December 54:21 decided 15:11 48:7 73:2 decision 12:3,4 12:9 14:1,2 17:24 18:3 20:15,23 21:4 22:5 23:19,24 24:25 25:6,18 25:20,24 26:1 59:7 64:10 74:18,18 75:10 75:14,17 decisions 23:1 23:10 66:21 deficiencies 26:16,18 28:8 29:6,12,13,18 29:19 30:12,19 30:20,24 31:3 denial 14:22 76:6 denied 16:5 23:12 26:2 deny 23:1 25:18 25:24 74:19 depends 31:6 39:25 40:21 41:20 42:10 50:11 describe 8:9 46:1 describing 75:13 desire 62:5 diagrams 9:13 11:3 DIANE 1:5	die 76:20 different 9:1 34:20,24 40:13 52:19 53:17 59:1,1 difficulties 71:4 direct 17:15 36:20 52:4 57:5 70:25 directed 46:18 55:11 directing 6:9 60:12 directly 62:9 directors 12:16 20:22 21:3,14 22:4,12 23:18 23:23 24:24 25:5,13 discouraged 72:23 discrepancies 26:4 30:1 31:19,24 32:10 32:15,23 58:24 70:12 discuss 28:17,22 47:1 66:7,12 discussed 11:20 16:10 20:3 24:8 36:2 76:13 discussion 8:22 19:1 66:8 68:10 69:19,21 69:25 70:2 72:5 discussions 9:21 10:11 22:11 46:8 documents 27:4 27:7,19 28:9 29:20 30:20,25 31:14 38:14 58:25	doing 8:10 24:19 45:24 52:14 double 35:10 49:11 due 13:15 16:15 20:16 31:10 54:17 duty 54:10 <hr/> E <hr/> E 36:21 52:4 75:6 e-mail 14:8,12 14:15,18,23 15:8,16,25 16:1,4,8,13,16 16:21,25 17:4 18:18 20:6,20 20:20 21:11,12 21:17,22 24:16 34:25 52:9,11 52:15 53:9,13 53:15,16,25 54:4,20,24 55:4,9,14,15 55:18,20,22 e-mailed 13:25 e-mails 21:2,24 22:2,3,8 25:16 52:24 53:4 54:7 56:4 70:22,23 earlier 57:21 62:4 echoed 58:5 71:9 either 4:20 10:3 19:1,2,23 23:14 28:15 39:2 49:12,21 53:25 54:7 68:17 75:8 either-or 54:7 elect 35:3,15 68:16 70:11
---	---	--	---	---

71:12 elected 34:1 49:25 50:7,14 59:13 70:19 72:17 electing 66:2 election 31:15 39:6,9,21 48:4 65:11,15,22 69:3 elections 33:5 38:24 39:4,11 39:14 43:3,20 44:15 48:8 49:6,9 54:16 70:5 Elgin 1:23 eligible 33:16,20 40:19 41:3 42:12 43:14 employee 5:6 Encounters 18:25 endangering 11:7,12,15 ended 31:5 68:12 entered 9:15 entering 9:16 era 34:22 error 22:22 especially 17:18 18:19 58:1 event 9:10 34:24 43:15,16 52:14 52:18,19,21 70:10 events 40:5 41:3 53:1 everyone's 49:2 evidence 8:14,18 exactly 61:6 example 33:14 34:4 exception 26:17	29:9 exec 72:17 executive 5:6 35:3,9 40:19 64:14,24 65:13 66:3,10 68:14 68:16 70:12 71:12 executives 19:24 20:3 31:21 32:16 33:16,23 34:1,5,6,6 35:17,20,23 36:3,4,9,11 49:25,25 50:7 61:5 64:13 65:6,13 70:17 exhibit 12:14,18 12:18,25 13:7 16:20,21,22,24 17:4 21:11,12 36:21 52:4 75:6 existence 48:9 49:5,8,24 50:6 expecting 24:23 24:24 25:5,12 express 47:12 expressed 48:2 62:20 63:1 64:11 71:15,20 72:1 expressing 64:7 64:15 <hr/> F <hr/> Facebook 34:24 52:19 fact 6:22 15:5,12 15:22 45:7 64:7,12 67:25 68:5,19 failed 66:11 Fakhry 45:8 fall 30:15	familiar 3:24 7:22 58:11 familiarize 5:23 10:2 familiarized 10:5 fee 40:15 41:2 43:2 feel 8:16 9:8 10:20 11:14,17 25:24 36:13 46:19 53:20,21 64:23,25 65:3 72:23 73:12 feeling 4:18 feels 74:7 felt 4:14,17,19 19:4,15,19 20:8,14 62:3 64:8,17 68:1 68:22 70:6 file 1:1 38:2 final 74:15 financial 28:8 31:16 71:4 financials 27:3,6 27:18 find 32:15 46:13 first 5:5 6:8 8:19 10:1 18:11 25:15,16 32:3 58:2,16 66:2 70:13 fit 18:3 five 45:7,12 50:17 60:23 69:19 71:16 fix 26:16 29:12 29:18 31:25 fixed 26:17 29:5 30:11 32:11 focus 67:4 folks 4:14 16:13 17:18 18:1,19 20:14 31:24	43:9 46:19 65:2 70:9 71:9 72:7,10 73:7 foregoing 77:6 forgot 27:15 48:12 69:11 form 39:9 59:17 formal 19:3 68:25 format 38:4 forward 46:25 found 2:12,15 23:14 24:20 26:4 31:19,24 four 34:6 35:9 35:23 36:3,4,8 36:11 fourth 66:3,10 68:16 70:11,18 71:12 Francesco 1:10 6:6 24:18 friends 46:1,5 full 53:13 function 35:24 36:5 37:13 funds 71:5 further 26:5 69:19,21 70:1 72:4 75:2 76:12,17 <hr/> G <hr/> Gender 56:20 general 4:7 16:16 19:22 34:21 35:1,5 35:14 40:5 43:11,16 44:9 46:18,22,24 47:24 48:24 49:2,13,18,22 51:20,25 52:14 52:25 56:7 62:7 65:4,16	67:6,10 68:8 71:11 72:8 73:1,2,5 74:6 generally 30:4 43:9 give 3:13 11:24 23:24 25:7 42:19 59:7 65:15 67:16 72:9 gives 40:17 42:14 49:15,17 go 5:19 8:20 21:8 32:19 33:20 35:13 50:14 57:15 59:12 65:3 going 22:10,14 22:16 26:7 32:4,5 36:11 40:23,25 49:1 49:2 51:7 53:24 60:6 65:11,15 72:17 golden 40:1 good 3:6,8 36:14 govern 74:17 75:3 governing 22:25 27:4,7,19 28:9 Grant 1:5 69:12 granted 14:8 44:23 group 3:24 23:2 23:20,25 25:7 25:19,25 26:14 26:20 28:3 47:5 49:23 50:5,12 56:21 61:1 74:19 group's 27:3 groups 5:25 26:16,17 28:13 29:5 30:11,24 31:2 60:17
---	---	---	--	---

guess 5:4,18,24 6:4 37:2 53:22 68:18 73:10 guidelines 38:3 38:10 guy 64:18	Hi 45:24 hold 35:19 45:20 72:7,21 73:2 holding 39:11 Honner 1:17 huge 73:1 human 68:6	45:11,12,13,17 46:12 47:3,5 47:12,20 48:2 48:7 49:24 50:5,17 51:17 52:2 53:3 54:3 54:13 60:15,24 61:21 62:8,12 62:24 63:10,16 63:18 69:6,20 71:16,19 influence 68:25 informal 4:12 9:6,21 10:10 information 54:15,15 informed 15:10 52:10 53:6 initial 29:23 instances 19:10 intentions 49:2 interest 39:10 68:23 interested 44:4 interject 8:13 internal 6:7 24:18 interpretation 41:5 invalid 54:9 invited 47:15 52:10,13 involved 11:23 33:6 41:13,18 41:25 60:16,25 involvement 5:5 5:9 issue 15:8,17,22 16:18 19:23 28:18 29:24 57:19 63:7 66:20 issues 10:15 19:25 27:3,10 27:18 28:7,12	28:19 30:25 31:14 32:12 46:15,16,21,24 57:21 58:24 61:22,23 62:6 64:1 65:19,22 66:1,14 item 66:2 items 27:13	46:17 47:7,8 48:21 49:1 50:16 51:8 54:23 57:14 59:25 63:6 64:8,19,21 65:9,18 69:3 72:7,25 73:7 73:18,24 74:3 74:4,6,23 75:1 75:9 knowledge 8:8 61:19 62:16,19 63:1
<hr/> H <hr/> HAGEL 1:5 hand 71:12 hand-picked 70:11 handbook 23:15 33:9 35:11,22 36:7,8,24 37:1 37:6 38:6,16 38:21 44:16 49:11 52:3,5,8 75:5,5,8 happen 22:10,16 42:14 50:15 happened 48:6 48:22,24 66:11 70:5 72:15 happening 30:4 73:8,12 happens 75:14 happy 75:22 Hashim 45:9 hear 4:4,9 22:13 23:18,23 24:4 24:24 25:5 26:7 51:11 53:1 63:3 heard 3:25 4:2,7 4:20 9:6 10:12 10:19 47:16 58:8 60:18 61:23 62:17 73:20 74:1,4,9 hearing 57:23 held 1:11 help 40:16 72:10 helping 72:11 helps 40:15	<hr/> I <hr/> i.e 15:17 ID 53:14 identified 26:16 29:6,24 31:1 37:3 identify 27:2 Immediately 6:3 Impact 56:22 implication 22:15 implies 22:16,21 improperly 30:3 in-camera 59:12 59:14 include 21:11 included 38:5 includes 41:7 43:19 including 70:18 incorrect 22:21 INDEX 1:14 2:1 indicate 15:4 21:1 53:5 55:3 55:16 57:7 67:18 indicated 4:16 20:21 21:13 47:20,24 50:18 69:18 indicates 26:12 individual 17:22 53:8 69:11 individual's 53:10 individuals 19:14 45:7,10	<hr/> J <hr/> Jason 27:1 34:14 39:13 57:7,13,15,15 58:5,11 59:5 Jason's 59:23,24 Jennifer 1:19 join 50:18 joint 43:19 July 28:2,7 June 7:12,15 27:22 28:2,7 31:8 32:10 JUSTICE 1:3	<hr/> L <hr/> late 32:3,5 letter 12:18 letting 33:7 72:6 lie 64:22 life 5:2,11,18,20 6:7 7:19 10:1 13:11 16:1 17:10 18:12 19:1 24:21,23 25:12 26:14 29:3,8,10,12 29:18 30:9 39:12 44:8 51:3,15 56:17 58:3 61:24 64:14 65:24 68:3,6,21 Life's 59:18 62:7 line 18:11 38:9 lines 67:24,25 list 2:10 52:16 52:24 53:10,23 listed 60:24 69:6 69:20 71:17 live 34:21 located 23:7 75:21 location 76:4 look 14:11 31:14	

31:18 70:20 looked 26:4 looking 8:16 12:21 27:13 28:19,20 75:4 lose 35:8,12 55:18 lot 28:13 73:21 73:23 74:1,4 luxury 49:17	materials 11:4 11:13 matter 21:15 mean 8:13 18:21 27:21 41:11 42:22 60:23 73:22 means 38:2 meant 19:7 media 34:25 meeting 16:10 25:9 35:2,4,5 41:24 42:8,19 42:20 43:11,16 46:13,18,22,23 47:16,21,22,25 48:4 49:3,13 49:18,22 50:18 51:10,20,25 52:15 56:7 60:19 62:7 65:4,12,17,22 65:23 66:14,15 66:23 67:1,3 71:11,16,25 72:8,21 73:1,2 73:5 meetings 11:24 11:25 34:1,11 34:18,21 35:1 35:19 40:5 44:20 48:24 52:25 64:20 member 4:7 39:8,22,22 40:8,14 41:8 42:9,19 49:16 59:13 70:24 members 22:11 39:20,21 40:15 40:17 41:8 43:2 44:14 50:8,19,20 51:1,3,5,12,17 51:19,21,23	52:2,7,10,13 53:2,5,10 63:5 63:16,17,21 70:17 74:11 members' 42:18 membership 31:22 34:25 35:14 40:2,10 40:15,18 41:2 41:7,7 42:1 43:1,6 46:24 52:16,22,24 53:23,25 54:1 70:16,21 72:25 73:3 men 66:20 67:4 messages 53:22 met 11:20 middle 60:14 Ministries 56:20 missing 21:7 mission 17:16 MISSISSAUGA 1:7 mistake 21:23 22:3,18,19 24:5,20 mistaken 22:18 misunderstan... 25:11 moment 56:2 month 7:14,20 Moore 1:16 2:5 3:5,18 6:12 8:20 9:2,18 12:19,23 13:1 13:5 14:16 16:24 17:2 18:9,16 21:18 21:25 22:23 24:12 27:23 30:17 36:13,19 36:25 47:10 48:20 50:23 51:9 55:12	57:1,4 60:2 61:17 73:24 74:25 75:11,25 76:11,16 motion 7:4 66:11 68:16 moved 68:15	31:21,21 37:25 53:13 numbers 53:23 54:4 Numerous 39:24 Nyasha 45:9
M			N	O
M 12:25 13:7 M5H 1:24 main 53:14 majority 73:15 making 8:9 9:8 10:20 11:17 18:2 38:14 64:25 66:20 male 64:14 males 64:15 man 17:22 mandate 6:14 7:5,10 10:6,16 10:17 14:24 15:1,9,13,17 16:9,11,15,17 18:4 26:3 28:16,20 29:24 41:12 56:13,18 57:18 59:21 60:9 61:25 64:2,4 65:6 72:2 mandates 44:5 56:14,23 March 1:10,12 3:2 Marty 1:16 mass 52:11,15 52:23 53:25 54:1 match 59:22 matching 60:10			N 16:22,24 21:11 name 3:9 45:8 53:10,13 69:11 named 45:13 names 54:9 nature 10:25 61:19 69:24 necessary 36:3,4 75:24 need 33:19 42:13 53:12,15 54:11 72:24 needed 33:8,12 34:11,15 36:9 70:16 72:12,12 needs 36:11 never 71:1 new 10:3 32:6 33:15,17 38:11 57:16 58:15 65:12,13 nominated 50:6 non-recognized 37:11 notes 8:17 notified 11:25 12:10 29:13,19 30:19 notifying 12:4 14:19 34:17 November 46:13 47:17 50:17 60:18 65:12,23 number 30:23	O 21:12 object 22:15,20 October 24:15 Off-record 8:22 offices 1:11 official 35:8 once 24:8,20 57:17 66:10 71:1 ones 31:12 Ontario 1:2,12 1:24,24 3:1 open 40:2,10,24 41:17 44:9 72:9 opened 35:12 opinions 57:23 oppose 73:16 opposed 44:14 48:7,9 49:3,5,8 49:24 50:6,8 50:13 opposition 47:12 48:3 order 66:16 organization 7:6 originally 4:1 9:23 15:7 21:6 24:5 60:4 72:14 Otello-Deluca 1:10 12:14 13:7 27:25 28:24 36:22 Otello-Deluca's 21:13 26:12

30:2 Ottawa 1:24 oversee 39:6 68:22	71:5 people 4:16 8:8 8:15 9:8,16 11:15,17 19:10 44:3 46:8,10 47:13 49:5,8 50:7,14 52:18 57:23 64:24 68:2,17 70:6 73:10 people's 11:7,12 perfect 46:20 47:1 65:19 period 27:13,24 28:2,6,11 29:16 periods 29:22 permits 44:3 person 68:6 personally 19:12 34:13 53:20 62:25 71:8 74:5 phone 53:22,23 phraseology 22:15,20 physical 11:7,12 platform 13:19 platforms 34:25 52:20 play 59:16 please 50:4 64:9 plugged 73:4,7 point 7:20,24 10:22 28:20 37:4,7,23 46:9 50:10 65:1 75:20,23 policies 5:24 6:15,20 8:2 16:12 22:25 23:4,7,16 36:8 37:5,21 54:11 56:13,15,24 74:16,20 75:3	policy 7:1 8:3,4 22:17,20 23:9 23:15 33:10 37:11,19 75:2 75:9,13,16 76:5,10 portfolio 58:3 position 4:25 5:20 6:1,8 14:21 15:9 40:19 44:13 56:16 68:3 positions 35:9 45:20 58:16 66:21 post 34:17 45:3 poster 70:24 posters 9:7 10:25 11:13 19:2 34:17,23 44:19,24 52:19 56:5 71:2,6 73:4 practical 36:3 practice 43:6 76:8 practices 27:3,7 27:18 28:9 present 24:10 25:9 39:15 presentations 11:24 president 5:1,11 5:13,18 29:2,7 30:8 pretty 49:20 74:14 75:7,15 previous 10:11 24:2 previously 9:22 10:11 prior 3:22 4:3 4:10,25 5:10 8:7 49:17 51:19 66:6	71:12 privileges 55:24 pro-choice 7:5 pro-life 6:14,24 7:2 13:18 14:6 14:21 15:5,14 15:18,22 16:6 16:18 19:6,15 19:19 20:8,13 60:9 64:16 67:3,6,9,11 71:14 72:1 73:16 probably 32:3 32:14 34:23,24 34:25 63:6,7 problem 13:2 15:6,18 procedural 24:19 procedure 31:15 procedures 42:14 43:7 proceeding 76:19 77:6 process 9:25 21:7 24:5,6,14 31:6 32:2,2,7 35:13 50:15 58:12 59:6 60:7 74:17 promise 3:17 promote 34:20 70:9 promoting 9:11 pronouncing 57:10 proposals 31:16 proposed 31:17 prospective 38:13 protect 49:7 68:2 protecting 70:15 provide 38:10	52:8 53:4,9,16 54:3,7 62:4 65:9 76:4 provided 9:4 48:18 54:14 providing 59:17 provisions 38:16 public 44:9 purposes 42:1 52:3,7 put 18:1 19:10 19:15 27:20 44:19 52:18 56:5 64:1 71:2 73:3 putting 9:7 20:14
<hr/> P <hr/> p.m 1:12 3:3 36:17,18 57:2 57:3 76:20 package 10:4,7 10:9 16:15 31:8 32:17 34:7 59:19 page 2:2,12 13:6 16:23 34:24 37:3 38:5 52:4 52:9,19 pages 2:15 paid 4:22 paragraph 6:10 17:8 28:25 56:11 57:6 60:13,24 61:7 63:11 69:6,20 71:17 paragraphs 26:11 part 7:4 40:5,10 43:11 49:1,13 59:10 partake 41:9 participate 40:6 41:10,12 42:5 43:15,18 particular 9:13 16:12 74:7 particularly 15:16 pass 33:18 passed 7:4 passing 4:11,21 45:23 64:21 pay 40:15 41:2 43:1 44:24 45:3 56:5,8	<hr/> Q <hr/> question 3:17 9:3 11:10 12:7 14:10 24:2 25:3,22 27:16 42:3 48:12,15 48:17 50:4 62:23 63:13 66:22 74:15 questioning 76:14 questions 8:19 63:10,16,20,25 76:12,17 quick 36:16			
	<hr/> R <hr/> R 12:14,18,18 raise 10:21 19:23 27:10,17 28:7 46:21 57:13 62:6 65:19,21 66:1 66:20,22,25 raised 20:18 28:12 57:22 66:1 67:2,8			

ratified 33:1	10:4 16:15	16:10 19:5,7	Reporting 1:11	24:7 25:12
re-recognition	23:12 26:21	19:25 22:7	1:22	26:6 27:14
10:4,6,9 15:12	27:12 28:11	23:8,11 24:4,5	represented	30:17 31:7
57:16 59:18	31:8 32:17,22	32:1,16 33:3	4:14	33:3,8 34:21
60:7	33:18 34:7	36:7,8 37:12	request 20:22	37:9,14 39:5
read 6:15,16	53:11 54:5	39:19 40:8,13	21:3,8,14 22:4	40:3,7 41:19
9:25 10:5,8	57:17 70:16	41:14 42:23	requested 26:9	42:14,16,18,20
13:10,22,23	recognize 25:1	43:5,6,8,10	require 62:5	43:18,19 46:23
17:7 18:5,6,9	recognized 3:23	45:19 48:11	required 38:15	47:3,25 50:16
18:20 20:7	5:13 10:18	49:11 55:23	requirements	52:1,13 53:20
29:10 30:12	13:12,14 37:8	56:17 57:19	38:4	54:2 56:10
38:2,6 52:11	37:9,16,17,20	59:9,17 60:5	reschedule	57:17 58:4
60:22 61:11	37:21 39:17	61:4 65:17	49:12,21	61:18 64:9
Readback 9:4	48:25 55:1,8	66:5 67:5	rescheduled	65:4,7 66:19
48:18	55:24,25 56:1	70:22 71:13	72:16	68:1,3,6,9 69:2
reality 40:8,9	56:2,9	75:16	respond 67:13	70:7,10,13,19
really 31:5,6	reconsider 76:9	registered 5:25	responded	71:3 74:5,24
32:2 39:24	reconsideration	rejected 14:20	67:16,20,20	75:3,9,12,19
40:21 41:20	76:6	relationship	Respondent 1:8	75:20,25 76:11
49:19 50:11	record 3:10 8:21	7:23 8:4	1:18	76:14
65:25 70:9,21	16:23 37:3	remember 39:1	responding	rights 68:2
73:1	57:1 75:24	44:8,10 53:14	16:23	role 5:5,9,19
reason 15:3,10	76:7	66:3,4 67:15	response 67:17	7:18 58:13,13
16:3,5,14 17:8	recorded 77:4	67:23 68:7	68:7,10	58:17 59:6,10
17:9 18:12	REF 2:15 22:14	70:24 74:13	restriction	59:16
29:11,17 31:10	29:21 51:7	renew 12:3,9	41:15 43:9	roles 45:11
36:1,2,4,10	55:10	13:9 14:3	restrictions	room 70:7 71:8
65:8	reference 18:17	20:24 21:5	40:25 41:1,6	72:13
reasons 13:8	referenced	22:6 23:20	42:21 44:11,13	rule 36:12 40:1
recall 9:20 15:24	27:24 37:7	renewal 3:23	49:15	rules 33:10
31:4,9 44:7,18	references 27:25	7:12 9:20	resubmit 31:25	run 40:19
47:9 48:24	28:1	10:15 11:21	resuming 36:18	rundown 65:16
51:13 55:21	referencing 8:3	14:7,20	57:3	running 39:8
61:4 63:2,21	20:19 39:20	renewed 18:13	review 27:8 59:2	Russ 2:4 3:4,11
63:22,24 66:17	56:11 61:8	renewing 12:11	reviewed 7:11	
67:19 74:12	referring 45:14	repeat 9:2 11:9	17:10 18:13	S
receive 15:12	Refusals 2:10,15	12:6 14:9	43:25	safety 11:7,12
16:14	refuse 53:3 54:3	20:25 25:2,21	reviewing 16:25	Salma 45:8
received 9:24	regard 7:5	48:14,16	revoked 44:23	62:10 63:21
32:21	regardless 17:20	rephrase 23:21	55:9	64:6 66:5 69:2
receiving 3:22	44:4 54:14	42:2 50:3	revote 20:23	sat 64:13
53:21	regards 4:12,14	62:22	21:4,14 22:5	Saville 1:19
Recess 36:17	4:23 6:23,24	report 12:15,22	right 15:15	saw 9:19
57:2	7:3 8:1,7 14:10	13:3,8	17:23 21:25	saying 8:15 61:4
recognition 9:25	14:17,23 16:8	Reporter 77:12	22:9 23:13	71:10 74:14

<p>says 28:25 36:12 41:16 44:7 54:11 61:10 schedule 72:20 scheduled 47:17 school 13:15 17:12 18:14 scrutineer 69:10 se 39:7 49:19 second 15:25 16:1 24:16 61:7 secret 68:17 see 37:6 50:25 seeing 70:24 seen 19:2,3,7 Selvanayagam 57:8 semester 32:3 send 31:13 52:15 53:25 sending 52:23 sent 14:18 15:8 15:25 16:7,13 17:4 22:1,3,8 24:17 25:16 58:20 59:2 70:23 sentence 30:5 60:14 61:7 63:11,14 September 17:5 18:18 20:7,20 21:2,12 24:14 32:6,23 Serapigia 45:9 Services 1:11,22 set 25:15 43:5 65:17 SFL 3:24 8:8,10 9:21 10:15,21 10:25 11:3,7 11:12,21,23 12:4,10 13:25 14:18 15:21</p>	<p>16:10 17:5 19:10 20:4,8 20:21 21:2 23:19,24 25:4 25:24 26:18,24 27:11 28:8 30:18 43:25 44:14,19 46:8 47:3,6,12 48:3 50:20 51:1,4 51:11,17 52:7 54:19 55:13 58:6,9 62:21 63:1,10,17,21 66:15 67:13,18 68:14 69:21 73:20 74:10,11 SFL's 3:22 6:14 9:19 12:3,9 13:9 19:15 20:13 25:18 27:6,18 44:14 44:22 46:13 47:4 48:3 56:12 57:11,17 58:19 59:1,21 61:1 68:10 73:16 shared 58:5,18 73:20 74:1 ship 70:24 Shorthand 77:5 show 41:24 44:3 showed 15:13 70:18 showing 42:19 shows 43:13 Siddall 77:12 sign 42:13,25 43:12 47:23 51:19 signatures 31:22 54:12 signing 51:22 silence 42:23</p>	<p>silent 42:17 43:7 simply 22:22 41:23 sine 76:20 sit 59:11,13,14 75:20 sitting 45:22 59:11 64:24 situation 16:12 17:21 situations 13:21 48:22 skill 77:4 small 4:6 social 34:24 43:16 somebody 55:17 sorry 8:12 18:7 22:14 25:10,21 27:15 48:13 68:24 space 9:14,15,15 9:17 24:8 40:7 46:20 47:1 56:4,6,8 65:19 65:25 66:7 72:20 spaces 11:17 special 35:4 58:19 59:2 specific 6:19 8:2 8:3 15:25 16:17 19:10 22:25 24:14 37:18 38:22 41:15 43:5,8 76:4 specifically 7:2 8:10 15:4 16:6 26:23 34:19,23 36:10 40:12 43:24 44:6,7 48:23 63:23,24 66:20 67:16,19 67:23 68:7</p>	<p>75:21 specify 15:16,17 15:19,20,21 16:2,4 spoke 57:7 63:19 staff 60:21 61:1 61:3,5,11,12 61:14,16 62:13 62:18,20 63:5 stance 13:16 14:7 15:9 19:5 19:16,19,25 20:9,13 67:3,9 67:10 68:2 71:13 stand 39:21 65:7 standard 76:8 standpoint 7:7 59:22 standpoints 60:10 stands 61:25 start 32:6 33:15 33:16 46:11 started 47:23 70:2 state 3:9 6:16 7:1 38:18 42:17,25 43:1 50:19,25 60:13 76:7 stated 14:25 15:13 33:9 37:5 46:11 48:11 49:14 62:3 71:1 75:8 statement 17:16 18:18,22 37:19 37:24 38:23 56:12 73:17 statements 19:7 31:17 64:19,25 states 6:13 13:9 35:22 36:6</p>	<p>37:4,19 38:7 42:12 43:2,21 52:9 stating 13:8 status 4:13 12:3 12:9,11 13:9 14:3,20,22 20:24 21:5 22:6 23:2,20 23:25 25:7,19 25:25 35:8,13 40:18 44:22,23 47:5 59:8,18 61:2 74:19 76:6 straight 28:16 28:21 Street 1:12,23 1:23 stripped 55:25 strongly 65:3 student 3:23 4:5 4:24 5:25 23:1 23:20,25 25:7 25:18,25 26:14 26:15,20 28:3 28:13 29:4 30:10,24 31:2 32:6 39:7 41:23 42:4,8 43:14 45:3,20 47:4,6 53:13 53:19 56:7,20 60:17 61:1 74:19 students 10:19 13:11 16:1 17:9 18:12,24 18:25 19:18,22 19:22 20:17 24:20,23 25:12 29:9,11,17 34:18 40:3,9 40:11,13,24 41:17,17 42:12</p>
--	--	---	--	--

43:10 44:8,10 45:10 49:15 51:3,14 52:25 53:15 54:10,11 54:12 59:18 61:24 62:7 64:13 65:24 73:4,15,21 74:2,9 STUDENTS' 1:7 Studies 56:21 stuff 70:6 Subject 24:1 submit 31:8,9 32:4 submitted 4:10 31:12 32:9 33:22 submitting 10:3 Suite 1:12 summer 11:19 26:19,24 27:8 27:11,19,21 28:1 29:17 30:15,20 SUPERIOR 1:3 supervise 39:3 39:14 supervised 38:24 69:15 support 41:12 74:10,14 supported 47:4 supporting 44:5 47:3 supposedly 70:23 sure 8:13,25 24:19 34:20 36:10,15 49:10 49:20 54:10 58:3 61:6 74:14,16,19 75:7,15	surprised 47:19 48:1 surrounding 46:15 61:24 sworn 1:10 2:4 3:4 <hr/> T <hr/> table 46:25 tabling 9:9 11:4 19:3 take 32:20 36:15 55:19 57:24 75:23 taken 24:7 33:18 36:17 57:2 68:14 talk 10:24 57:12 66:15 talked 62:25 talking 14:13 30:4 Taman 45:8 62:10 64:6 69:3 task 58:2 team 64:14 technically 51:20 technology 34:22 tell 13:19 14:5 50:24 51:2,4 51:11 55:13,17 55:19 65:8 telling 17:17 18:19 19:4 20:9 44:19 template 33:11 38:10 term 56:17 terms 4:13 6:25 7:6 8:15 9:6 13:17 19:22 21:7 31:20	32:25 33:12 40:14 44:9 52:13,22,23 54:8 56:17 57:25 59:16 61:24 62:2 63:24 64:2,3 68:4 71:11,14 72:11 74:6 text 54:1 Thank 18:16 32:8 76:11,18 theirs 31:10 therefrom 77:5 thing 68:18,22 70:15 72:23 things 33:19 53:15 64:22 66:12 think 8:17 12:17 12:24 25:10,18 53:13,14 55:10 61:9 67:24,24 three 32:15 33:15,23 35:17 35:20 62:11,24 69:5 70:17 time 4:22,24 10:1 22:1 27:21 28:7 29:22 30:15 31:12 32:18 56:2 57:9 58:17 70:3 72:9 76:12 timeframe 30:13 timeline 30:16 today 3:12 76:16 told 19:19 50:22 55:7 62:4 65:2 70:8 72:22 Toronto 1:7,12 1:24 3:1 tough 57:9	training 5:19 transcribed 77:5 transcript 1:14 8:25 9:1 transitioned 6:6 transitioning 6:8 treated 58:19 trick 3:17 true 49:2 trying 66:3 67:22 Tuesday 1:12 3:2 turn 73:6 Turning 17:3 two 25:16 32:14 53:24 68:23,24 71:12 <hr/> U <hr/> U/T 2:12 76:3 unaware 71:10 uncomfortable 4:19 8:9,11,16 9:9 10:20 11:17 65:1 understand 8:5 20:12 41:5 Understood 76:15 undertake 26:19 undertaken 26:13 undertaking 2:12 75:23 76:1,2,3 UNDERTAKI... 2:10 undertook 28:2 undone 49:19 union 1:7 4:24 45:3,20,21 union-recogni...	38:1 UNIVERSITY 1:7 unrecognized 38:23 upcoming 13:15 use 33:11 34:24 53:9 54:2,4 UTM 4:5,6 19:21 29:9,11 29:17 40:2,9 40:11,24 41:17 43:13 44:10 45:10 49:15 54:10,12 56:21 56:21 UTMSU 3:20 4:25 5:5,11,13 5:15 6:15,19 6:25 7:1,3,19 7:23 8:2 13:13 17:13,16 19:18 19:24 20:3 21:4 22:24 26:21 36:7 37:5,10 38:2 41:8 42:19 45:12 49:7 53:11 55:8,15 55:22,24 56:9 60:10,16,21 61:1,5,5,11,12 61:14,16 62:13 62:18,20 63:4 73:15,21 74:2 UTMSU's 7:7 10:17 16:11 23:16 38:3,9 38:12 56:13,15 56:24 59:22 61:3 UTor 53:14 <hr/> V <hr/> vacancy 35:8,12
--	--	---	--	---

vague 64:1	52:17 53:5,16	13:4 14:13	wrong 25:19,25	121 42:7 52:4,9
valid 44:15	56:6 62:5	24:3 47:8	70:5	122 42:16
vice 5:1,13,17	68:24 71:2	48:19 60:1	wrote 68:17	123 42:24
29:2,7 30:8	wanted 8:24	61:15 74:23		124 43:18
view 19:13,14	18:14 46:25	75:7	<u>X</u>	125 43:24
65:1	50:13,18,19,25	woman 17:22	X 41:3	126 44:2
viewpoint 67:5	51:3,5,11 52:2	64:8	<u>Y</u>	127 44:12
viewpoints 7:8	52:6 57:24	woman's 65:1	year 10:11 13:15	128 44:18
64:15	58:3 65:18	women 13:20	17:12 18:14	129 44:22
views 16:12	66:9	17:18 18:20	33:17	13 5:21 60:13,24
73:16	wanting 41:25	20:9 56:20	Yussuf 45:9	61:8 63:11
voice 57:23	49:5	64:8		69:6,20 71:17
voicing 62:3	wants 40:6	Wood 1:18 3:16	<u>Z</u>	130 45:2
vote 34:5 40:20	41:23	6:11 8:12,23	ZETTEL 1:5	131 45:6
41:3,24 42:8	wasn't 4:6,21	12:17,21,24		132 45:16
42:12,15,18,20	9:14,24 10:4	13:2 14:11	<u>0</u>	133 45:25
42:25 43:2	11:23,25 28:18	16:22 17:1		134 46:4
44:4,14,15	30:18,19 44:11	18:7,11 21:16	<u>1</u>	135 46:7
47:20,25 48:3	63:5 65:25	21:21 22:14	1 3:6 37:25	136 46:12
48:8 49:6,8,17	66:6 68:22	24:1 27:20	1:49 1:12 3:3	137 47:2
51:25 54:16	69:10 70:9	29:21 36:15,23	10 5:4	138 47:11
68:14,18,23,25	72:18	47:7 50:21	100 35:2 48:25	139 47:15
69:19	way 35:24 40:7	51:7 55:10	101 35:7	14 5:23
voted 32:25 33:1	46:20 52:12,15	59:25 61:9	102 35:16	140 47:19
69:3,6 70:7	52:21 54:8	73:22 74:22	103 35:19	141 48:1
73:11	58:4 68:25	75:4,22 76:3	104 36:1	142 48:6
votes 69:8,9,14	71:9 72:23	76:15,18	105 36:20	143 48:13
69:16	ways 34:20	word 18:25	106 37:2	144 48:16
voting 66:10	39:24 40:13	work 29:23	107 37:9	145 48:21
73:12	53:17,24	72:19	108 37:14	146 49:4
VP 5:10 6:6,7	week 9:10	worked 26:15	109 37:18	147 49:23
7:19 10:1	weeks 32:15	30:23	11 5:8	148 50:5
24:18 26:14	went 28:21 58:3	working 29:1	110 37:23	149 50:16
38:25 39:12	70:4	30:7,18 31:2	1105 1:23	15 1:12 3:2 6:3
58:14 68:21	weren't 11:6,11	45:19	111 38:13	150 50:24
	28:19 29:13,19	wouldn't 19:21	112 38:18	151 51:4
<u>W</u>	32:17 34:22	23:23 24:3,4	113 38:22	152 51:10
Walied 24:18	35:25 44:23	35:12,21 50:1	114 39:16	153 51:16
want 8:18 14:11	64:17 73:11	50:9 51:18	115 39:19	154 51:22
27:20 32:6	willing 40:23	55:14 63:2	116 41:4	155 52:1
33:14 37:16,20	72:9	73:18 74:3	117 41:11	156 53:3
41:9,10,12,13	wind 46:15	written 23:4,7,9	118 41:19	157 53:8
41:17 42:4,6,7	winter 72:8 73:2	74:16,20 75:2	119 37:3 41:23	158 54:2
42:8 43:11	73:6	75:3,13 76:5	12 5:17	159 54:13
47:5 48:3	WITNESS 9:5	76:10	120 42:4	16 6:9

160 54:19	2	24 8:7	5	81 27:6
161 54:23	2 3:9 37:4,7	248 13:6	5 3:22 6:10	82 27:10
162 55:3	2:38 36:17	25 9:19 31:22	56:11	83 27:14
163 55:7	2:51 36:18	54:12	50 17:7	84 27:17
164 55:13	20 7:14	251 16:23	51 2:16 18:17	85 27:24
165 55:17	200 1:23 68:9	26 10:8	52 19:9	86 28:6
166 56:10	201 68:13	26th 14:1,8,18	53 19:13	861-8720 1:25
167 56:19	2015 5:2,18	16:4,25 20:20	54 19:18	87 28:12
168 57:5	11:19 26:19,24	21:2,10	55 2:16 20:1	88 28:18
169 57:11	27:8,11,19,22	27 10:14	56 20:6	89 28:24
17 6:13	28:1 29:17	28 10:24	564-2727 1:25	9
170 58:5	30:15,21 54:21	29 2:16 11:2	57 20:12	9 5:1
171 58:8	2015-2016 17:11	2T4 1:24	58 20:19	90 29:16
172 58:11	18:14 23:25	3	59 21:1	900 1:12
173 58:18	2016 1:10,12,22	3 2:4,5 3:12	6	900-333 1:23
174 58:23	3:2	3:20 57:2	6 4:2 38:5 57:6	91 30:18
175 59:5	202 69:2	3:31 57:3	60 21:10	92 30:23
176 59:20	203 69:5	3:58 76:20	61 21:19	93 32:8
177 59:24	204 69:8	30 11:6	613 1:25	94 32:21
178 60:3	205 69:12	31 11:11	62 22:1	95 33:3
179 60:8	206 69:15	32 11:16	63 22:9	96 33:21
18 6:19	207 69:18	33 11:19	64 22:24	97 33:25
180 60:12	208 69:24	333 1:12	65 23:4	98 34:9
181 61:6	209 71:15	34 11:23	66 23:6	99 34:15
182 61:18	21 7:18	35 12:2	67 23:9	
183 62:8	210 71:20	36 12:8	68 23:13	
184 62:11	211 71:22	37 12:13	69 23:17	
185 62:15	212 71:25	38 13:6	7	
186 62:19	213 72:4	39 13:25	7 4:9	
187 62:24	214 73:14	4	70 23:22	
188 63:9	215 73:19	4 1:10 3:19	71 24:13	
189 63:15	216 73:25	40 14:5	72 24:22	
19 7:9	217 74:9	41 14:17	73 25:4	
190 63:20	218 74:15	416 1:25	74 25:10	
191 64:3	219 75:1	42 14:25	75 25:17 70:16	
192 65:10	22 2:16 7:22	43 15:3	76 2:13 25:23	
193 65:21	220 75:12	44 15:15 26:11	77 26:6	
194 66:13	221 75:19	45 15:20 26:11	78 26:11	
195 66:19	23 8:1	28:25	79 26:23	
196 66:25	23rd 17:5 18:19	46 16:3	8	
197 67:8	20:7,21 21:2	47 16:16	8 4:16	
198 67:13	21:12 46:13	48 16:20	80 27:2	
199 67:18	47:17 50:18	49 17:3		
1L5 1:24	60:19 65:12,23			
1st 7:12 31:9	72:15			