

COURT FILE NUMBER 1403-06143
COURT COURT OF QUEEN'S BENCH OF ALBERTA
JUDICIAL CENTRE EDMONTON
PLAINTIFF(S) AMERICAN FREEDOM DEFENSE INITIATIVE
DEFENDANT(S) THE CITY OF EDMONTON
DOCUMENT **Affidavit of Pamela Geller**
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Affidavit of Pamela Geller

I, Pamela Geller, of the City of New York, in the state of New York, MAKE OATH AND SAY THAT:

1. I have personal knowledge of the facts deposed to, except where stated to be based on information and belief, and where so stated I believe them to be true.
2. I am President of the American Freedom Defense Initiative (hereafter "AFDI"). The AFDI is an American non-profit, non-partisan human rights activist and advocacy group. The objectives of the organization include the promotion and defence of freedom of speech, freedom of conscience, individual rights, and the equality of all people before the law.
3. The AFDI is concerned with and promotes the rights of Muslim women because these women are threatened with honour killing in many countries, including the United States and Canada, and have no one to speak up for them and defend them within their own communities.

4. On September 30, 2013, AFDI's Canadian Advertising Manager, Diane Molstad, phoned the 311 number for the City of Edmonton, inquiring about advertising on the city buses in order to place an ad for the AFDI. Molstad was given an Edmonton Transit business number and informed that Pattison Outdoor Advertising Ltd. (hereafter "Pattison") was the vendor for Edmonton Transit advertising. She left a message at Edmonton Transit Business division and when no one returned the call, she phoned Pattison and also left a message.
5. On October 1, 2013, Elaine Gauthier ("Gauthier"), Senior Account Executive for Pattison, returned Molstad's message. Molstad asked Gauthier about advertising space so that AFDI could place an advertisement ("ad") on the back of Edmonton buses.
6. Molstad emailed Gauthier an image of the proposed ad and asked that it be placed on the back window of five buses for four weeks, as they had discussed over the phone. She asked Gauthier to send her a contract once the transit authority approved the ad.
7. The ad read, "Girls Honor Killed By Their Families," under a photo of several girls who had been killed by honour killing. The rest of the ad read "Is your family threatening you? Is your life in danger? We can help: go to FightforFreedom.us".
8. The AFDI wished to place this ad based on its concern about honour killings taking place in Canada, as in the cases of Aqsa Parvez and the Shafia family. Parvez was strangled to death by her father and her brother in her home in Mississauga, Ontario, in December 2007. The three Shafia sisters, as well as the first wife, were found dead inside a car on June 30, 2009 in Kingston, Ontario. The Shafia father, second wife and son were found guilty of first degree murder and conspiracy to commit murder under the guise of honour killing.
9. The ad was designed to provide Muslim women and girls with help, should they feel threatened. The ad was also designed to challenge and repudiate the opinion that honour killings are in any way acceptable or justified. The ad also sought to change public attitudes, to bring support for gender equality and the rule of law.
10. The ad featured seven women who were honour killed because they preferred to live by Western and progressive values rather than medieval or fundamentalist values, and to assert their equal dignity as human beings.
11. Honour killing typically occurs because a woman is considered to have sullied the family's honour through some sexual indiscretion or even through perceived immodesty; her killing is considered to cleanse the family's honour.
12. When a Muslim woman phones the AFDI help line, she is referred to a safe house where she can go to be protected from those who are threatening her. The AFDI

- connects her with Muslims and former Muslims who have made the journey to safety. The help line is designed to protect women and girls in danger of being injured or killed by their families.
13. The AFDI's objective concerning the ads is to protect women and girls and save lives. The ad was designed to alert threatened girls and women that help is available.
 14. On October 2, Gauthier emailed Molstad, telling her that on the basis of the artwork submitted, the ad was accepted. Gauthier outlined steps regarding payment details and the necessary specifications for the ad artwork.
 15. Attached hereto and marked as Exhibit "A" is a true copy of the email concerning the approval of the ad.
 16. The final artwork was submitted with changes, reading "Muslim Girls Honor Killed By Their Families", under the same photo, with the rest of the ad reading "Is your family threatening you? Is there a fatwa on your head? We can help: go to FightforFreedom.us".
 17. Attached hereto and marked as Exhibit "B" is a true copy of the ad submitted by Molstad and eventually approved and posted by Edmonton Transit.
 18. On October 3, Gauthier emailed Molstad to tell her that Gauthier would seek approval for the revised ad.
 19. On October 4, Gauthier emailed again, stating: "The new artwork has been approved for posting with the same caveat, if there are a large number of public complaints, the transit authority may order the material down." Gauthier had not previously communicated that there was a caveat.
 20. Gauthier included space rental and printing quotes for the campaign, and noted that the ads would commence on October 21, for four weeks. Also on October 4, Molstad returned signed contracts to Gauthier, and confirmed that the ads were scheduled to run for four weeks, beginning on October 21. At this point I remitted payment and the signed contracts.
 21. Attached hereto and marked as Exhibit "C" to this my Affidavit is a true copy of the contracts.
 22. On October 23, Gauthier emailed Molstad a photo sheet including photographs of the ads running on five buses, with the bus numbers noted. Gauthier copied Paige McRae of Pattison Outdoor.
 23. Attached hereto and marked as Exhibit "D" to this my Affidavit is a true copy of the photo sheet.

24. On October 29, Gauthier emailed the following: “A number of complaints have been received by Advertising Standards Canada, Edmonton Transit and the City of Edmonton regarding the attached advertisement for AFDI. The City of Edmonton has ordered the ads removed and Canadian Ad Standards is reviewing them. I will keep you informed as to any further developments or outcomes”.
25. Attached hereto and marked as Exhibit “E” to this my Affidavit is a true copy of the email concerning the cancellation of the ads.
26. The City of Edmonton has not provided any copies of any complaints, nor has the City of Edmonton provided a copy of the result of the review allegedly undertaken by Canadian Advertising Standards.
27. On October 30, 2013, Gauthier wrote to me, sending a full refund of the money AFDI had paid for the ads.
28. On February 3, 2014, a letter was sent to Charles Stolte, Manager of Edmonton Transit Services, requesting that the decision to ban the AFDI ad be reversed. I am informed by my legal counsel that no response to this letter has been received.
29. Attached hereto and marked as Exhibit “F” to my Affidavit is a true copy of this letter.
30. Through this decision, the City of Edmonton has frustrated *bona fide* efforts to assist women and girls, and to protect them from honour killings. The decision of the City of Edmonton has silenced a voice speaking up for women’s equality and the rule of law.

SWORN BEFORE ME at New York, New York, this ____ day of _____, 2014.

_____)

_____) **Pamela Geller**