

**ONTARIO
SUPERIOR COURT OF JUSTICE
(Divisional Court)**

BETWEEN:

MADELINE WELD AND VALERIE THOMAS

Applicants

-and-

OTTAWA PUBLIC LIBRARY

Respondent

AFFIDAVIT OF VALERIE THOMAS

I, **VALERIE THOMAS**, of the City of Montreal, in the Province of Quebec, **MAKE OATH AND SAY:**

1. I am one of the Applicant's in this Application for Judicial Review and as such I have knowledge of the matters to which I here depose. Where any facts I depose to are based on information and belief, I state my source and believe them to be true.

ACT! FOR CANADA

2. I am a resident of the City of Montreal and I am a retired business owner. I am currently the National Director of ACT! For Canada and have held that position for approximately nine years.

3. ACT! For Canada (“ACT”) is a registered non-profit organization with approximately two thousand members across Canada. The purpose of ACT! For Canada is to promote the democratic and constitutional values of Canada. We also seek to promote Canada’s national security.
4. ACT! For Canada opposes the establishment of practices that we see as being contrary to Canadian values and security, such as certain practices associated with Sharia law. We believe that objectionable practices associated with Sharia law are protected and enforced by the laws of some countries. We strive to ensure that such practices, which among other things discriminate against women, do not receive the protection of law in Canada.
5. Our organization has many outspoken critics who have falsely described us as being racist and Islamophobic because of our opposition to certain aspects of Sharia law. These critics often protest events that we plan, such as the screening of the documentary “Killing Europe” which is the subject of this application.
6. Contrary to what our critics say, we do not advocate discrimination of any kind. Our opposition is to political ideologies. Membership in our organization is open to people of all faiths and backgrounds. We never use nor do we condone racial slurs. Furthermore, our website includes a disclaimer about the importance of understanding the difference between Muslims and what we see as the objectionable practices of Sharia law. It states that the majority of Muslims in Canada do not follow the objectionable practices of Sharia Law and that many have come here to escape those practices. Our disclaimer further states that it is our job to understand this difference, and to educate all citizens in a winsome, peaceful, and loving manner.

THE DOCUMENTARY

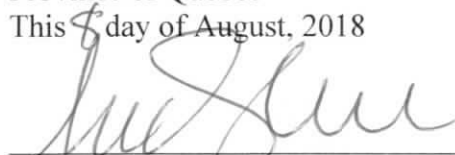
7. I first saw the trailer for the documentary “Killing Europe” (“the documentary”) sometime in October 2017. I knew that Madeline Weld, who is the head of the Ottawa Chapter of ACT! For Canada, was planning on publically screening the documentary at the Ottawa Public Library on November 25, 2017.
8. The documentary was produced by Michael Hansen. The film features Michael Hansen’s return to Europe after a fifteen year absence and the changes that he either witnessed there or that were described to him, including terrorist attacks, no-go zones, riots, and gang rapes. I understood that the film was critical of European immigration policies.
9. The Ottawa screening of “Killing Europe” was supposed to be the world premiere of the documentary. I understood that Michael Hanson would be in attendance and would take questions from the audience. I wanted to see the film and have the opportunity to ask Michael Hanson questions about it. I wanted to make up my own mind about the contents of the film. I therefore purchased a train ticket to Ottawa to attend the screening.
10. Unfortunately, the screening of the documentary was cancelled by the Ottawa Public Library on November 24, 2017, just one day before it was scheduled to take place. As a result, I cancelled my train ticket and paid a cancellation fee. I was disappointed that I, and other people who would have attended the event, were denied the opportunity to view the documentary and make up our minds about its message. I was also particularly discouraged and upset that the cancellation was

made by the Ottawa Public Library. As both a public body and a library, I expected the Ottawa Public Library to uphold freedom of expression.


11. While I was disappointed, I did end up seeing the film in Toronto on December 3, 2017 when, in response to the cancellation, it was screened at the Toronto Zionist Centre as an event jointly held by ACT! For Canada and the Jewish Defence League. It was considerably more inconvenient and expensive for me to attend the screening in Toronto than it would have been had the Ottawa screening not been cancelled.

12. Based on my observation, there were approximately two hundred attendees at the screening of the documentary in Toronto. Michael Hanson also attended and answered questions once the film was over. Unfortunately, I was not able to stay and listen to all of the questions or participate in the discussion because I had to leave the event early to catch a plane to Montreal. This is a problem I would not have faced had the documentary been shown in Ottawa as planned.

Sworn before me at
The City of Montreal in the
Province of Quebec
This 8 day of August, 2018


A Commissioner for Taking Oaths




Valerie Thomas