

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

BETWEEN:

MADELINE WELD AND VALERIE THOMAS

Applicants

-and-

OTTAWA PUBLIC LIBRARY

Respondent

AFFIDAVIT OF MADELINE WELD

I, MADELINE WELD, of the City of Ottawa, in the Province of Ontario, **MAKE OATH AND SAY:**

1. I am one of the Applicants 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.

The Ottawa Public Library

2. The Ottawa Public Library ("OPL") is managed and controlled by a Public Library Board pursuant to the *City of Ottawa Act* and the *Public Libraries Act*. According to the OPL's website, the board currently consists of nine trustees, including four city councillors and five members of the public.

The Ottawa Public Library's Policies on Free Expression

3. The OPL has a number of policies and statements relating to freedom of expression and intellectual freedom. One such document is entitled *Strategic Directions and Priorities 2015-2018*. That document contains the following statement on intellectual freedom:

We defend the rights of library customers to freedom of thought, belief, opinion and expression as the basis of a democratic society.

A copy of the *Strategic Directions and Priorities 2015-2018* is attached as **Exhibit A**.

4. The OPL's website also contains a list of policies including an *Intellectual Freedom Statement*. The website indicates that the Ottawa Public Library Board approved this statement on May 9, 2017. The *Intellectual Freedom Statement* includes the following provision:

The Ottawa Public Library (OPL) supports intellectual curiosity and enquiry, and supports intellectual freedom as the prerequisite for an informed, democratic society as part of its core values as expressed in the OPL Strategic Directions and Priorities. The Ottawa Public Library defends "the right of library users to freedom of thought, belief, opinion and expression as the basis of a democratic society", as embodied in the Canadian Charter of Rights and Freedoms, the Ottawa Public Library values, and as expressed by the Canadian Federation of Library Associations and the Ontario Library Association in their statements on intellectual freedom.

A copy of the Intellectual Freedom Statement is attached as **Exhibit B**.

5. The above passage from the OPL's *Intellectual Freedom Statement* makes reference to intellectual freedom statements of both the Canadian Federation of Library Associations and the Ontario Library Association. In fact, both of those statements are incorporated in their entirety into the OPL's *Intellectual Freedom Statement* and can be reviewed in Exhibit B. The statements of both library associations include robust policies in favour of free speech including the following:

- Libraries have a core responsibility to safeguard and facilitate access to constitutionally protected expressions of knowledge, imagination, ideas, and opinion, including those which some individuals and groups consider unconventional, unpopular, or unacceptable. To this end, and in accordance with their mandates and professional values and standards, libraries provide, defend, and promote equitable access to the widest possible variety of expressive content and resist calls for censorship and the adoption of systems that deny or restrict access to resources. (*Canadian Federation of Library Associates Statement on Intellectual Freedom*)
- That the provision of library service to the public is based upon the right of the citizen, under the protection of the law, to judge individually on questions of politics, religion and morality. (*Ontario Library Association Statement on the Intellectual Rights of the Individual*)
- That freedom of expression includes freedom for a creator to depict what is ugly, shocking and unedifying in life. (*Ontario Library Association Statement on the Intellectual Rights of the Individual*)

- That it is therefore part of the library's service to its public to resist any attempt by any individual or group within the community it services to abrogate or curtail access to information, the freedom to read, view and listen by demanding the removal of, or restrictions to library information sources in any format. (*Ontario Library Association Statement on the Intellectual Rights of the Individual*)

OPL Meeting Room Booking Policy

6. The OPL has a *Meeting Room Booking Policy* whereby it rents meeting rooms to the public for a fee. One of the rooms that the OPL offers for rent is the auditorium at the Main Branch of the Ottawa Public Library ("the auditorium"). A copy of this *Meeting Room Booking Policy* is attached as **Exhibit C**.

Booking the Auditorium

7. I have attended at the auditorium. It is located in in the basement of the Main Branch Library and it sits 189 people. It is separated from the common areas of the library by a series of hallways and stairways. Library users and other members of the public cannot hear or view what occurs inside the auditorium unless they enter it through a set of doors.
8. On October 25, 2017, I submitted an online request to book the auditorium for Saturday November 25, 2017. The purpose of booking the auditorium was to show a documentary called "Killing Europe" ("the documentary"). The producer of the documentary, Michael Hansen, was also scheduled to attend the event to discuss the film and take questions from the audience. Only

individuals who paid an admission fee would be permitted to enter the auditorium to view the documentary and listen to Michael Hansen.

The Documentary

9. I have viewed the documentary. Among other things, it features footage of Michael Hansen interviewing Europeans about changes to European society including terrorist attacks, riots, and gang rapes. It is critical of European immigration policies and left-wing political groups. I do not believe that the film expresses anything which would result in discrimination or anything that would expose any person or group to detestation or vilification based on characteristics such as race, religion, gender, national or ethnic origin.
10. The showing of the documentary was sponsored by an organization called ACT! For Canada (“ACT”). I am a member of ACT and have been the Ottawa Chapter leader since September 2016. Our organization and its members have been unfairly slandered as being “racist” and “Islamophobic” by individuals who describe themselves in various ways including “anti-fascist” and “socialist.”
11. In fact, ACT strives to preserve Canadian freedoms, democracy, and national security. We do not promote views that are racist or discriminatory. We have concerns about certain practices associated with Sharia law, but we unequivocally condemn all forms of hate speech, including hate speech that is directed against Muslims or adherents of any religion.

Past ACT Bookings with the OPL

12. To my knowledge, ACT has booked the OPL auditorium on four occasions prior to the event in question. Each event featured a different speaker for which admission was charged at the door:

- a. In February 2013, ACT hosted a British lawyer named Gavin Boby. I was not actively involved in ACT at that time, but I understand that Gavin Boby is known for using zoning regulations to oppose the building of mosques in certain neighbourhoods. Based on an online CBC article dated February 4, 2013, I understand that the OPL received hundreds of e-mails demanding that the event be shut down. According to the article, OPL board chairwoman, Jan Harder, felt that the event should not be cancelled unless laws were broken. She stated that it was important to preserve freedom of speech. Attached and marked as **Exhibit D** is a copy of the CBC article of February 4, 2013.
- b. On September 29, 2016, ACT presented a talk by Nick Vandergragt. Mr. Vandergragt spoke about socialist political agendas, terrorism, and Islam.
- c. On March 11, 2017, ACT presented a talk by Jordan Peterson, the topic of which was post-modernism, Marxism, and political correctness. This event was met with vehement protest from various groups and individuals. It nevertheless took place and every seat in the auditorium was filled.
- d. On March 29, 2017, ACT booked Trevor Loudon to speak at the auditorium. Mr. Loudon is an author, filmmaker and political commentator from New Zealand. He spoke about the

relationship between communism and political Islam as well as Motion M-103. Approximately twenty seats were sold for this event.

My Communications with OPL

13. As stated, on October 25, 2017, I submitted an online request to book the auditorium to screen the documentary. Later that day, I received an e-mail response from the library indicating that the request would be “reviewed by staff” and that “once approved” I could proceed with payment. Attached as **Exhibit E** is a copy of the library’s e-mail of October 25, 2017.
14. On October 27, 2017, two days after submitting the booking request, I received an e-mail from the library confirming that my request had been “reviewed and confirmed” by library staff. I immediately paid the booking fee of \$194.99 and received an e-mail confirming payment and enclosing a copy of the rental contract. Attached and collectively marked as **Exhibit F** are copies of the e-mails of October 27, 2017, the text of which includes the rental contract.

Further Communications with OPL

15. On November 14, 2017, I received a telephone call from Catherine Seaman, who is part of senior management at the OPL. Catherine Seaman stated that the library had some concerns about “where the discussion will go” and she inquired whether I would adhere to the Ontario’s *Human Rights Code* and the *Criminal Code*. I advised that I would adhere to both statutes.

16. In the same telephone conversation, Catherine Seaman informed me that the library had contacted the Ottawa Police Service regarding the booking. The police apparently told her about social media activity expressing criticism of the booking. Catherine Seaman stated the library was “anticipating disruptions” and that I would have to arrange and pay for security. I agreed to do so.
17. I first attempted to arrange security through the Ottawa Police Service Paid Duty Office by e-mailing them a request on November 16, 2017. I received a response on November 22, 2017, from Sergeant Mark Nethercott indicating that paid duty officers would not be provided and that I should hire a private security firm. I received a telephone call from Catherine Seaman on the same date in which she advised me that the OPL knew the police were unable to provide security and that the OPL took the initiative of hiring two security guards for the event. I agreed to pay the cost of these security guards.
18. I had no further communications with anyone from the OPL until November 24, 2017. On that date I received an e-mail from Danielle McDonald, Chief Executive Office of the OPL, stating the following:

I am writing in respect of your rental booking with the Ottawa Public Library for Saturday, November 25th, 2017.

As a result of a number of complaints that have been raised, Library staff have undertaken a further review of the presentation entitled, Killing Europe, which you have proposed to screen at the Ottawa Public Library’s Main branch tomorrow.

As you are presumably aware, the Terms and Conditions governing bookings on Ottawa Public Library premises state as follows:

The Library will not provide public space, facilities and/or properties within its jurisdiction to an individual or group that supports or promotes views, ideas or presentations which promote or are likely to promote discrimination, contempt or hatred to any person on the basis of race, national or ethnic origin, color, religion, age, sex, marital status, family status, sexual preference, or disability, gratuitous sex and violence or denigration of the human condition. The Library reserves the right to cancel a contract if any of the above-noted circumstances arise.

Based on my review of the presentation, it is my view that the content falls within the category of material that the Library is not prepared to have displayed or screened on its property. As a result, I must advise that the Library is immediately cancelling the booking in question.

Any deposit paid to reserve the space will be returned to you shortly.

A copy of Danielle McDonald's e-mail of November 24, 2017 is attached at **Exhibit G**.

19. Later in the day, at 3:32 p.m., I received an email from the library confirming that the booking was cancelled. This e-mail is attached as **Exhibit H**.
20. At approximately 4:30 p.m. on November 24, 2017 I attended at the Main Branch Library to inquire about the cancellation. There I met with the Deputy Chief Executive Officer, Monique

Desormeaux, who stated that the OPL decided to cancel the booking because it contravened the terms and conditions of the rental contract. No further explanation was provided.

Reasons for the Cancellation

21. To date, I am unaware of exactly which terms of the rental contract were contravened and I am unaware of what materials the library viewed to arrive at that conclusion.
22. I am further unaware of any specific complaints that the library received which caused their staff to “further review” and then cancel the booking.
23. I am however aware of online and media activity that was critical of booking. Some of the materials I have reviewed include the following:
 - a. On November 13, 2017, a group calling itself “Ottawa Against Fascism” published a “Call to Action for November 25th” on their Facebook website. The publication described ACT! For Canada as a “far-right organization” and encouraged its followers to contact the Ottawa Public Library. A printout of this Facebook post is attached as **Exhibit I**.
 - b. On November 22, 2017 a post appeared on the Facebook website of “OG’LAMP Ottawa-Gatineau’s Lebanese, Arabs, Muslims & Palestinians Etc.” which accused the City of Ottawa of “promoting Islamophobia” by allowing the booking. The post instructed readers to e-mail the Mayor of Ottawa and City Councillor Tim Tierney. A printout of this Facebook post is attached as **Exhibit J**.

- c. On November 23, 2017, an Ottawa lawyer named Richard Warman submitted an open letter to Ottawa City Council and the OPL encouraging them to “correct the media’s mistaken impression” that the documentary would be shown in at the OPL. Richard Warren expressed “deep concern” that the event would constitute a breach of Ontario’s *Human Rights Code*. A printout of Richard Warren’s letter is attached as **Exhibit K**.

24. I am also aware of an article from CFRA News Talk Radio dated November 24, 2017, which reports that Tim Tierney – Library Board Chair and City Councillor – made the following statement:

“I try not to interfere with the day-to-day operations of the library ... That being said, we do have policies and procedures and I’ve heard from our labour council in Ottawa, I’ve heard from our unions, that there’s concern. I brought it to the attention of our CEO, Danielle McDonald, she looked at our policies and procedures, which includes the police actually viewing it, the staff viewing it; it passed those tests, but there were some other hurdles that were there and we decided that the best decision was we aren’t going to show the movie.”
(Emphasis added)

At no point did anyone discuss any of the supposed “hurdles” with me. A copy of the CRFA News Talk Radio article of November 24, 2017 is attached at **Exhibit L**.

25. Finally, I am aware of a Ottawa Metro article of November 26, 2017 which reported that Main Branch Manager Tony Westenbroek as saying “we took a closer look at the material, and

reviewed our policy, and decided it's the type of material we don't want displayed on our property." Attached as **Exhibit M** is a copy of the Ottawa Metro article of November 26, 2017.


26. I make this Affidavit in support of the within Application to Divisional Court for Judicial Review and for no other purpose.

Sworn before me at
The City of Ottawa in the
Province of Ontario
This 10th day of August, 2018



A Commissioner for Taking Oaths

LSO# 24402K


Madeline Weld

This is Affidavit "A"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019, *DH*

A handwritten signature, likely of a notary public, is written over a horizontal line. The signature is stylized and appears to be "D.H. [unclear]".

► **About OPL (/en/aboutopl)**

Contact us (/en/contact)

Media room (/en/mediaroom)

Board of Trustees (/en/opl_board)

Get a library card (/en/card)

Support OPL (/en/make-donation)

Ottawa Central Library (<http://ottawacentrallibrary.ca/>)

Strategic Directions and Priorities 2015-2018

About OPL (Main page) (/en/aboutopl)

Policies and statements (/en/policies)

▮ **Strategic Directions and Priorities 2015-2018 (/en/stratplan)**

Careers (/en/careers-ottawa-public-library)

Annual reports (/en/annual-report-archive)

Partners (/en/partners)

History (/en/node/18718)

Fraud and Waste Hotline (/en/fraud-and-waste-hotline)

Interactive report on the economic impact of OPL (/en/impact)

Budget 2018 (/en/budget-2018)

➡ (<https://bibliottawalibrary.ca/en/print/14988>)

Vision

To build community and transform lives.

Mission

To inspire learning, spark curiosity, and connect people.

Values

Access and Inclusion

We are committed to providing basic services to every person in Ottawa, free of charge, and to providing barrier-free facilities, resources and services.

Accountability

We are responsible for meeting the library service needs of the community in an efficient, effective and fiscally responsible manner.

Bilingualism

We provide a strong bilingual context in English and in French for our resources and services.

Dynamic Workforce

We promote a stimulating work environment that recognizes and rewards employee creativity in serving the people of Ottawa.

Informed Community

We believe that Ottawa's future economic and social prosperity depends on ensuring that all citizens are well informed and supported in their aspirations to learn throughout their lifetimes.

Innovation

We continuously review current practices, make improvements, leverage technology and create new standards of performance to drive service improvements.

Intellectual Freedom

We defend the rights of library customers to freedom of thought, belief, opinion and expression as the basis of a democratic society.

Love of Reading

We nurture the joy of reading in people of all ages.

Right to Privacy

We respect and protect the privacy of our customers

Service Excellence

We excel in customer-driven service and provide welcoming and expert service supportive of human differences.

Directions and Priorities

Services that are customer centric

- Act as a catalyst for exploration and discovery
- Provide physical and digital collections that are responsive to customer demands and community needs
- Enhance the customer experience by leveraging best practices and technology

Spaces for community, collections, and creation

- Develop an inclusive, dynamic Central Library, enabling creation and learning
- Sustain collaborative and flexible physical spaces across the Library system
- Design virtual spaces for creation and sharing

Success through learning, literacy, and innovation

- Strengthen and promote the Library's reach and value
- Foster community partnerships
- Align Library services in support of customer needs



About OPL (/en/aboutopl)

Media room (/en/mediaroom)

OPL Board (/en/opl_board)

Get a library card (/en/card)

Loan periods and fees (/en/fees-and-fines)

Donate (/en/make-donation)

Friends of the Ottawa Public Library Association (/en/friends-public-library)

Volunteer (/en/volunteer)

Contact us (/en/contact)

Kids' Zone (/en/kid-zone)

Staff Blogs (/en/staff-blogs)

Accessibility (/en/accessibility)

Loan Periods and Fees (/en/fees-and-fines)

Privacy statement (/en/privacy-statement)

Site map (/en/sitemap)

This is Affidavit "B"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019,

DM

[Signature]

► **About OPL** (</en/aboutopl>)

Contact us (</en/contact>)

Media room (</en/mediaroom>)

Board of Trustees (/en/opl_board)

Get a library card (</en/card>)

Support OPL (</en/make-donation>)

Ottawa Central Library (<http://ottawacentrallibrary.ca/>)

Intellectual Freedom

About OPL (Main page) (</en/aboutopl>)

Policies and statements (</en/policies>)

Accessible formats and communication supports policy (</en/content/accessible-formats-and-communication-supports-policy>)

Accessibility policy (</en/content/accessibility-policy>)

Commemorative naming policy (</en/node/16285>)

Disability accommodation requests (</en/content/disability-accommodation-requests>)

Display space and bulletin board use policy (</en/content/display-space-and-bulletin-board-use-policy>)

Customer code of conduct (</en/content/customer-code-conduct>)

■ Intellectual freedom statement (</en/intellectual-freedom>)

Meeting room booking policy (</en/meeting-room-booking-policy>)

Privacy statement (</en/privacy-statement>)

Public network access policy (</en/public-network-access-policy>)

Public computer terms of use (</en/terms-use-public-network>)

Social media policy (</en/social-media-policy>)

Material Selection Criteria (</en/content/material-selection-policy>)

Taking photos / videos (</en/taking-photos-videos>)

OPL contest rules (</en/contestrules>)

Strategic Directions and Priorities 2015-2018 (</en/stratplan>)

Careers (</en/careers-ottawa-public-library>)

Annual reports (</en/annual-report-archive>)


Partners (</en/partners>)

History (</en/node/18718>)

Fraud and Waste Hotline (</en/fraud-and-waste-hotline>)

Interactive report on the economic impact of OPL (</en/impact>)

Budget 2018 (/en/budget-2018)

 (<https://bibliootawalibrary.ca/en/print/16288>)

The Ottawa Public Library (OPL) supports intellectual curiosity and enquiry, and supports intellectual freedom as the prerequisite for an informed, democratic society as part of its core values as expressed in the OPL *Strategic Directions and Priorities*. The Ottawa Public Library defends “the right of library users to freedom of thought, belief, opinion and expression as the basis of a democratic society”, as embodied in the Canadian Charter of Rights and Freedoms, the Ottawa Public Library values, and as expressed by the Canadian Federation of Library Associations and the Ontario Library Association in their statements on intellectual freedom.

The OPL statement on Intellectual Freedom does not apply to the expression or dissemination of views that promote and/or incite hatred as defined by the *Criminal Code of Canada*. Such communications are prohibited on library premises and may result in a person’s immediate expulsion from the premises and referral of the matter to the Ottawa Police Services.

1 Canadian Federation of Library Associations Statement on Intellectual Freedom (1)

All persons in Canada have the fundamental right, subject only to the Constitution and the law to have access of the full range of knowledge, imagination, ideas, and opinion, and to express their thoughts publicly. Only the courts may abridge free expression rights in Canada.

The Canadian Federation of Library Associations affirms further that libraries have a core responsibility to support, defend, and promote the universal principles of intellectual freedom and privacy.

The Canadian Federation of Library Associations holds that libraries are a key institution in Canada for rendering expressive content accessible and affordable to all. Libraries are essential gateways for all persons living in Canada to advance themselves through literacy, lifelong learning, social engagement, and cultural enrichment.

Libraries have a core responsibility to safeguard and facilitate access to constitutionally protected expressions of knowledge, imagination, ideas, and opinion, including those which some individuals and groups consider unconventional, unpopular, or unacceptable. To this end, and in accordance with their mandates and professional values and standards, libraries

provide, defend, and promote equitable access to the widest possible variety of expressive content and resist calls for censorship and the adoption of systems that deny or restrict access to resources.

Libraries have a core responsibility to safeguard and foster free expression and the right to safe and welcoming places and conditions. To this end, libraries make available their public spaces and services to individuals and groups without discrimination.

Libraries have a core responsibility to safeguard and defend privacy in the individual's pursuit of expressive content. To this end, libraries protect the identities and activities of library users except when required by the courts to cede them.

Furthermore, in accordance with established library policies, procedure and due process, libraries resist efforts to limit the exercise of these responsibilities while recognizing the right of criticism by individuals and groups.

Library employees, volunteers and employers as well as library governing entities have a core responsibility to uphold the principles of intellectual freedom in the performance of their respective roles.

2 Ontario Library Association Statement on the Intellectual Rights of the Individual (2)

In affirming its commitment to the fundamental rights of intellectual freedom, the freedom to read and freedom of the press, as embodied in the Canadian Charter of Rights and Freedoms, the Ontario Library Association declares its acceptance of the following propositions:

- 1 That the provision of library service to the public is based upon the right of the citizen, under the protection of the law, to judge individually on questions of politics, religion and morality.
- 2 That intellectual freedom requires freedom to examine other ideas and other interpretations of life than those currently approved by the local community or by society in general, and including those ideas and interpretations, which may be unconventional or unpopular.
- 3 That freedom of expression includes freedom for a creator to depict what is ugly, shocking and unedifying in life.
- 4 That free traffic in ideas and opinions is essential to the health and growth of a free society and that the freedom to read, listen and view is fundamental to such free traffic.

5. That it is the responsibility of libraries to maintain the right of intellectual freedom and to implement it consistently in the selection of books, periodicals, films, recordings, other materials, and in the provision of access to electronic sources of information including access to the Internet
6. That it is therefore part of the library's service to its public to resist any attempt by any individual or group within the community it services to abrogate or curtail access to information, the freedom to read, view and listen by demanding the removal of, or restrictions to library information sources in any format
7. That it is equally part of the library's responsibility to its public to ensure that its selection of material is not unduly influenced by the personal opinions of the selectors, but determined by the application of generally accepted standards of accuracy, style and presentation

(1) Canadian Federation of Library Associations *Statement on Intellectual Freedom*, February 2017

(2) Ontario Library Association *Statement on the Intellectual Rights of the Individual*, 1998; reaffirmed by OLA Board of Directors, December 2005.

Approved by the Ottawa Public Library Board on May 9, 2017



About OPL (/en/aboutopl)
Media room (/en/mediaroom)
OPL Board (/en/opl_board)

[Get a library card \(/en/card\)](#)
[Loan periods and fees \(/en/fees-and-fines\)](#)

[Donate \(/en/make-donation\)](#)
[Friends of the Ottawa Public Library Association \(/en/friends-public-library\)](#)
[Volunteer \(/en/volunteer\)](#)

[Contact us \(/en/contact\)](#)
[Kids' Zone \(/en/kid-zone\)](#)
[Staff Blogs \(/en/staff-blogs\)](#)

[Accessibility \(/en/accessibility\)](#)
[Loan Periods and Fees \(/en/fees-and-fines\)](#)
[Privacy statement \(/en/privacy-statement\)](#)
[Site map \(/en/sitemap\)](#)

This is Affidavit "C"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019, *TH*

DLH

► **About OPL** (</en/aboutopl>)

Contact us (</en/contact>)

Media room (</en/mediaroom>)

Board of Trustees (/en/opl_board)

Get a library card (</en/card>)

Support OPL (</en/make-donation>)

Ottawa Central Library (<http://ottawacentrallibrary.ca/>)

Meeting Room Booking Policy

About OPL (Main page) (</en/aboutopl>)

Policies and statements (</en/policies>)

Accessible formats and communication supports policy (</en/content/accessible-formats-and-communication-supports-policy>)

Accessibility policy (</en/content/accessibility-policy>)

Commemorative naming policy (</en/node/16285>)

Disability accommodation requests (</en/content/disability-accommodation-requests>)

Display space and bulletin board use policy (</en/content/display-space-and-bulletin-board-use-policy>)

Customer code of conduct (</en/content/customer-code-conduct>)

Intellectual freedom statement (</en/intellectual-freedom>)

■ Meeting room booking policy (</en/meeting-room-booking-policy>)

Privacy statement (</en/privacy-statement>)

Public network access policy (</en/public-network-access-policy>)

Public computer terms of use (</en/terms-use-public-network>)

Social media policy (</en/social-media-policy>)

Material Selection Criteria (</en/content/material-selection-policy>)

Taking photos / videos (</en/taking-photos-videos>)

OPL contest rules (</en/contestrules>)

Strategic Directions and Priorities 2015-2018 (</en/stratplan>)

Careers (</en/careers-ottawa-public-library>)

Annual reports (</en/annual-report-archive>)

Partners (</en/partners>)

History (</en/node/18718>)

Fraud and Waste Hotline (</en/fraud-and-waste-hotline>)

Interactive report on the economic impact of OPL (</en/impact>)

Budget 2018 (</en/budget-2018>)

→ (<https://bibliottawalibrary.ca/en/print/15519>)

Purpose

To offer meeting spaces in Ottawa Public Library (OPL) locations as a community service to individuals and organizations.

Statement

The OPL is a community meeting place and information source for customers and, as such, will make available meeting room space to the public on a fee basis and in a fair and consistent manner.

The OPL supports intellectual freedom as the prerequisite for an informed, democratic society. In addition, it strives to provide facilities that are welcoming, convenient and accessible and act as a community-gathering place.

Access to Library Meeting Rooms

As a community service, Library Meeting Rooms will be made available to the public for rental purposes.

Priority for the use of Library Meeting Rooms is given to Library and Library partnered meetings, programs or events. When these needs have been met, the Library will accommodate requests from the public. However, with the exception of Library and Library partnered events, events where liquor is served are not permitted.

The Library will only pre-empt customers who have already paid to rent a Library Meeting Room, with sufficient advance notice (two (2) days where possible) when emergencies arise or when unforeseen Library requirements for meeting rooms arise. Payment will be refunded or another booking scheduled, at the preference of the customer.

The Library does not necessarily endorse or recommend the positions, views, programs or policies of those using Library Meeting Rooms, and does not necessarily support statements made during meetings in Library Meeting Rooms.

Bookings

Click here for a list of meeting rooms available for booking through the OPL Online Meeting Room (OMeRo) Booking System (<https://bibliottawalibrary.ca/en/booking-meeting-room>).

All bookings will be reviewed by Branch employees, to ensure groups meet Policy requirements. Branch employees will finalize the Meeting Room transaction by marking it confirmed.

If the booking application does not meet Policy requirements, employees will follow up as required.

Fees

Library Meeting Rooms are provided as a community service and are not rented solely to generate revenue.

Fees include the use of the room's basic equipment installed and supplies as specified in the Library General Terms and Conditions for Rentals. **Click here for a list of fees for meeting rooms available for booking through the OPL Online Meeting Room (OMeRo) Booking System (<https://bibliottawalibrary.ca/en/rates-and-fees>).**

The Harmonized Sales Tax of 13% is included in the rental fees.

If paid online through Paymentus (online payment system), totals of \$750 or over are charged a service fee. The customer must check a box agreeing to pay the fee.

Payment of bookings must be verified prior to the customer using the room.

Fees for the use of Library Meeting Rooms are waived in the following circumstances:

- For Library and Library partnered events, meetings, and programs
- For all Ottawa City Council and City of Ottawa employees doing City business
- For training offered by approved English as a Second Language (ESL), Français langue seconde (FLS), literacy groups, and Library Settlement Partnerships organizations

Payments

Payment for meeting room bookings will not be accepted by phone.

Payments may be done online at time of booking or in person at a Library branch within a maximum seven (7) days of making the booking. If not paid within seven (7) days, the booking will be released.

Bookings made under a week's notice must be paid prior to the rental date and time. If not paid, the booking will be released.

When payment is made online, an email will be sent to the customer regarding receipt of payment.

When payment is made in person, the customer will receive a printed receipt.

Customers whose credit cards are declined in Paymentus will need to arrange for payment to be completed in person at a Library branch.

Refunds

Contract holders must give to the Library two (2) business days' (based on the meeting room branch location hours of operation) notice in writing, before the day of the event to cancel or request a modification to their rental contract. Refunds will not be granted once the notification period has expired.

Refunds relating to credit card payments made online using Paymentus will be referred to InfoService.

Refunds relating to payments made in a Library branch will require Contract holders to show the original cash register receipt

Publicity & Signage

In any advertising or promotional material, only the proper name of the Library shall be used, and any such material shall refer to the place of meeting as Ottawa Public Library, name of branch, and shall designate its proper municipal address. No use of the Library's logo is permitted without explicit consent of the Library.

Advertising will not imply endorsement by the Library of the content of the meeting or event.

Permission to post notices of the event or program in the Library must be given by the location's manager.

Signs will be posted outside all meeting rooms that are available for public use, indicating that the positions taken or statements made do not necessarily reflect the opinion of the Ottawa Public Library Board.



This is Affidavit "D"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019, *js*



A handwritten signature in black ink, appearing to be "D. H. [unclear]", is written over a horizontal line. The signature is stylized and includes a large, sweeping flourish that extends below the line.



Anti-mosque lawyer speaks in Ottawa despite protests



Gavin Boby doesn't believe in building mosques in 'non-Muslim areas'

CBC News · Posted: Feb 04, 2013 7:46 PM ET | Last Updated: February 4, 2013

A lawyer with controversial views on mosques in non-Muslim areas speaks at an Ottawa library. 2:48

A controversial British lawyer spoke in Ottawa despite protest from groups who oppose his opinion, which is that mosques should not be built in non-Muslim areas.

Gavin Boby spoke in front of 40 people at the main branch of the Ottawa Public Library Monday evening as protesters stood outside the branch at the corner of Metcalfe Street and Laurier Avenue West.

Boby, who is also an activist, is known for using zoning regulations to try to stop mosques from opening in areas he considers "non-Muslim."

He told the CBC's Simon Gardner before the speech he does not want views of Islam to dictate certain neighbourhoods.

"Increasingly what we are seeing now is self-declared Muslim areas where you get Muslim patrols saying you can't walk a dog, wear a skirt," he said.

A group that claimed it strives to "stop Muslims from taking over neighbourhoods" organized Boby's speech. The Ottawa police hate crimes unit also monitored the talk.

Speech only stopped if laws are broken

Ihsaan Gardee, executive director with the Canadian Council on American-Islamic relation, said the library should have cancelled the visit.

But the library said it only rented the auditorium out to the group and it forced the group organizing Bobby's speech to sign an agreement not to violate criminal or human rights laws.

Police were consulted on the issue as well, and encouraged groups to book the room for a speech on an opposing viewpoint.

But some groups were unhappy with the decision to let Bobby speak.

"By affording someone like this who has this kind of message, a publicly-funded taxpayer venue, it adds and gives a credibility to their message, which I don't think is something that should be considered lightly," Gardee said.

Library board chairwoman Jan Harder said she received hundreds of emails demanding she shut the event down, but she echoed the library's sentiment it can only be stopped if a law is broken. She said it was important to preserve freedom of speech.

©2018 CBC. All Rights Reserved. No part of this program may be reproduced without permission.

08/03/2018 10:00 AM

This is Affidavit "E"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019, *DPH*

DPH

-----Original Message-----

From: oplwebchanges@biblioottawalibrary.ca
[mailto:oplwebchanges@biblioottawalibrary.ca] On Behalf Of
Main/Centrale@biblioottawalibrary.ca
Sent: October 25, 2017 5:59 PM
To: madweld@rogers.com
Subject: Hello Madeline Weld!

Hello Madeline Weld!

You have booked Auditorium at Main on November 25, 2017 - 1:30pm.

Your confirmation number is 76255

Your booking will be reviewed by staff and once approved you will be able to pay for your booking. You will receive a message once it has been approved with a link to payment.

You may cancel your booking at
<https://biblioottawalibrary.ca/en/opluser/login?rid=>

For assistance, please contact infoservice@biblioottawalibrary.ca.

.....

This is Affidavit "F"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019, *DH*.

DH

From: oplwebchanges@biblioottawalibrary.ca
[mailto:oplwebchanges@biblioottawalibrary.ca] On Behalf Of
Main/Centrale@biblioottawalibrary.ca
Sent: October 27, 2017 9:21 AM
To: madweld@rogers.com
Subject: Hello Madeline Weld!

Hello Madeline Weld!

Auditorium at Main on November 25, 2017 - 1:30pm

Your booking for Auditorium at Main on November 25, 2017 - 1:30pm has been reviewed and confirmed by our staff. Your confirmation number is 76255. Please complete payment within 7 days or the booking will be cancelled.

The reviewer has added the following comments:

You can pay or cancel your booking at
<https://biblioottawalibrary.ca/en/opluser/login?rbid=401961> (Login required).
For assistance, please contact infoservice@biblioottawalibrary.ca.

From: oplwebchanges@bibliooottawalibrary.ca
[mailto:oplwebchanges@bibliooottawalibrary.ca]
Sent: October 27, 2017 6:41 PM
To: madweld@rogers.com
Subject: Hello Madeline Weld!

Hello Madeline Weld!

Your payment for booking ID 76255, which is a reservation of Auditorium at Main on November 25, 2017 - 1:30pm is complete.

You may cancel your booking at <https://bibliooottawalibrary.ca/en/user/401961/bookings>. To process a credit card refund, please contact infoservice@bibliooottawalibrary.ca

A copy of your rental contract is below.

From: oplwebchanges@biblioottawalibrary.ca
[mailto:oplwebchanges@biblioottawalibrary.ca]
Sent: October 27, 2017 6:41 PM
To: madweld@rogers.com
Subject: Hello Madeline Weld!

Hello Madeline Weld!

Your payment for booking ID 76255, which is a reservation of Auditorium at Main on November 25, 2017 - 1:30pm is complete.

You may cancel your booking at <https://biblioottawalibrary.ca/en/user/401961/bookings>. To process a credit card refund, please contact infoservice@biblioottawalibrary.ca

A copy of your rental contract is below.

GENERAL TERMS AND CONDITIONS

CONTRACT HOLDER: PLEASE READ ALL OF THESE PROVISIONS In consideration of the Ottawa Public Library ("Library") issuing the attached Ottawa Public Library Meeting Room Rental Contract ("the contract"), the contract holder (and the sponsoring organization, if applicable) is voluntarily assuming the risks associated with holding the described event and is confirming they have read, fully understand and will adhere to the following general terms and conditions:

THE CONTRACT AND THE CONTRACT HOLDER

1. The contract holder must be the full age of 18 years.
2. The contract holder must have a copy of the contract readily available at all times.
3. The person who signs the contract must be duly authorized to do so on behalf of the contract holder (and of the sponsoring organization, if applicable).
4. The contract must be accepted online before confirmation of room is given or access to the facility will be denied.
5. The contract holder and the sponsoring agency cannot transfer or assign the contract without prior authorization from the Library.
6. It is the responsibility of the contract holder to make all members of its group using the Library facility aware of the terms and conditions of the Rental Contract, and to provide the members with a copy of these terms and conditions, if requested.

THE EVENT

7. The use of decorations or special effects, not provided by the Library, must comply with public safety and fire regulations and be authorized in advance by the Library Branch.

8. Permission to post notices in the Library must be given by the location's manager or designate.

9. The Library shall seek full restitution for damages caused to the Library facility or equipment by the contract holder, its employees, volunteers or attendees, arising from the use of the facility. The Library may also take such other action as may be deemed necessary to offset any costs incurred by the Library resulting from the use of the facility/premises by the contract holder.

APPLICATION OF OTHER LAWS

10. The contract holder must comply with all applicable Federal, Provincial and Municipal by-laws (including but not limited to those relating to taxes, copyright fees, and licensing matters) and shall be responsible for any associated taxes, fees, tariffs and levies that may apply to the use of the facility/premises and function for which this contract is issued.

11. The contract holder must comply with all applicable rules and regulations, policies and procedures of the Library, all City of Ottawa By-laws, including but not limited to By-laws that prohibit smoking, the Noise By-law, Signage By-law, and Parks By-law.

12. Permission to use Library facilities/premises in no way constitutes approval to engage in any unlawful activity or conduct in a manner that would violate any Federal, Provincial or Municipal Law.

THE FACILITY

13. The contract holder shall use Library facilities/premises, equipment and furnishings provided in a manner consistent with their intended use.

14. The rental fee covers only the space itself, plus tables and chairs. The inclusion of additional equipment is limited to the equipment permanently installed in the rented meeting room.

15. Persons using Library facilities are responsible for the set-up and arrangement of the room. The facilities are to be left in their original condition and room arrangement.

16. Smoking is not permitted in Library facilities or their meeting rooms.

17. Alcoholic beverages may not be dispensed or consumed on Library property.

18. Space is allocated for the dates and times stated on the contract only. No storage is permitted in the Library branch between bookings.

19. Only the areas identified on the contract(s) are to be used by the contract holder or sponsoring organization, unless prior authorization has been received from authorized Library employees.

20. All exits in the facilities must be kept free from obstructions in case of fire or other emergency.

SAFETY AND RESPONSIBILITY

21. The contract holder shall ensure all attendees follow the Library's Customer Code of Conduct:

<http://bibliooottawalibrary.ca/en/content/customer-code-conduct>.

22. The contract holder shall attend the event for which the contract was issued and be responsible for decision making during and after the event.

23. The contract holder shall ensure the physical setting in the rented facility is kept safe for participants and the general public attending the event.

24. If the contract holder becomes aware of activities or conduct during the use of the facility that could lead to personal injury or property damage, the contract holder shall take immediate and decisive action to prevent participants and the general public attending the event from engaging in these activities or conduct.

25. The Library may require a security plan to be submitted by the contract holder and/or the presence of police officers or security guards may be required during the event, the cost of which shall be borne by the contract holder.

26. In the event of an incident the contract holder must follow the Incident Reporting Procedures described below. An incident includes bodily injury to the contract holder, a participant and the public, or damage to Library property or third party property.

Ø Call 911, when Police, Ambulance, Fire etc., assistance is required.

Ø Immediately advise onsite Library employees of the incident. If a Library employee is not readily available, for major incidents call 311 to report or, for minor incidents, contact Library employees the next working day.

27. The contract holder, the sponsoring organization, their employees, volunteers and agents, shall cooperate with Library employees, Library representatives, police, investigating authorities and the insurance companies involved in the incident and, shall provide Library employees access to all rental spaces.

INSURANCE

28. Contract holders and sponsoring organizations renting Library facilities/premises to conduct low risk activities are strongly encouraged to maintain liability insurance coverage to a limit of \$1,000,000 inclusive per occurrence for bodily injury, death and damage to property in one of the following forms: Commercial General Liability, Special Events Liability, Home Owners' Personal Liability, Tenants or Condominium Owners' Personal Liability. At the discretion of the Library, contract holders or sponsoring organizations renting Library facilities/premises to conduct medium or high risk activities may be required to maintain the above insurance and if requested by the Library, such insurance shall name the Library as an additional insured there under. The Library may require the contract holder or sponsoring organization using Library facilities/premises for medium or high risk activities to provide a Certificate

of Insurance evidencing the above insurance coverage prior to holding the described event.

The Library reserves the right to increase the limit of insurance required. Compliance with the above insurance requirement is the sole responsibility of the contract holder or sponsoring organization.

INDEMNIFICATION

29. The contract holder agrees to indemnify and save harmless the Library from all claims, demands, causes or action, loss, costs or damages that the Library may suffer, incur or be liable for resulting from the contract holder's negligence, acts or omissions, obligations, failure to adhere to the terms of conditions related to the holding of the event described in the contract.

PAYMENTS

30. The contract holder shall be held responsible for payment of the contract. Payment is due as specified in the contract and Library Meeting Room Policy: (include URL).

CANCELLATIONS/REFUNDS

31. Contract holders must give to the Library two (2) business days notice (based on the meeting room branch location hours of operation), in writing, before the day of the event to cancel or request a modification to their rental contract. Refunds will not be granted once the notification period has expired.

32. If requested and granted a modification to the rental period in accordance with item #31 noted above, the Contract holder will be provided with an amended Rental Contract via email reflecting the approved modifications, for information. The terms and conditions of the signed Rental Contract will continue to apply to the rental and use of the facility, and is binding on the Contract holder.

33. The Library reserves the right to cancel the rental contract at any time in the case of emergencies or when unforeseen circumstances arise. In such cases the Library will make every effort to provide the Contract holder with 24 hours' notice of cancellation, however, such notice may not be possible in all circumstances. In the case where the rental period is for more than one day's use, cancellation may be made on any one or more of the booked dates. The Library will make every attempt to grant the Contract holder access to the premises at another time or allow a proportionate rebate for the period of rental time cancelled.

34. The Library shall have the right to cancel the rental contract immediately without notice if, in the opinion of the Library, the Contract holder or any person(s) using the facility with the consent of the Contract holder, wilfully damages Library property, displays misconduct, unlawfully consumes alcoholic beverages, is in violation of any terms of this rental contract or a City By-law, the Library's Customer Code of Conduct or any applicable Federal or Provincial law.

35. The Library will not provide public space, facilities and/or properties within its jurisdiction to an individual or group that supports or promotes views, ideas or presentations which promote or are likely to promote

discrimination, contempt or hatred to any person on the basis of race, national or ethnic origin, color, religion, age, sex, marital status, family status, sexual preference, or disability, gratuitous sex and violence or denigration of the human condition. The Library reserves the right to cancel a contract if any of the above-noted circumstances arise.

Non-compliance with the terms and conditions of this contract could result in the immediate suspension of the contract(s) or a written warning. A second incidence of non-compliance will result in the cancellation of the contract.

This is Affidavit "G"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019. *DH*

Madeline Weld

From: Marecak, Dylan [mailto:dylan.marecak@bibliottawalibrary.ca] **On Behalf Of** McDonald, Danielle
Sent: November 24, 2017 11:43 AM
To: madweld@rogers.com
Cc: Seaman, Catherine; Desormeaux, Monique
Subject: OPL Meeting Room Rental - November 25, 2017

Dear Ms. Weld,

I am writing in respect of your rental booking with the Ottawa Public Library for Saturday, November 25th, 2017.

As a result of a number of complaints that have been raised, Library staff have undertaken a further review of the presentation entitled, Killing Europe, which you have proposed to screen at the Ottawa Public Library's Main branch tomorrow.

As you are presumably aware, the Terms and Conditions governing bookings on Ottawa Public Library premises state as follows:

The Library will not provide public space, facilities and/or properties within its jurisdiction to an individual or group that supports or promotes views, ideas or presentations which promote or are likely to promote discrimination, contempt or hatred to any person on the basis of race, national or ethnic origin, color, religion, age, sex, marital status, family status, sexual preference, or disability, gratuitous sex and violence or denigration of the human condition. The Library reserves the right to cancel a contract if any of the above-noted circumstances arise.

Based on my review of the presentation, it is my view that the content falls within the category of material that the Library is not prepared to have displayed or screened on its property. As a result, I must advise that the Library is immediately cancelling the booking in question.

Any deposit paid to reserve the space will be returned to you shortly.

Regards,

DANIELLE MCDONALD

Chief Executive Officer | Directrice générale

Ottawa Public Library | Bibliothèque publique d'Ottawa

120 Metcalfe Street | 120, rue Metcalfe | Ottawa, ON K1P 5M2

☎ 613.580.2424 ext. | poste 32189 | ☎ 613.567.8815 | ✉ danielle.mcdonald@bibliottawalibrary.ca

This is Affidavit "H"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019 *DR*

A handwritten signature in black ink, appearing to be "DR", is written over a horizontal line.

-----Original Message-----

From: oplwebchanges@biblioottawalibrary.ca
[mailto:oplwebchanges@biblioottawalibrary.ca]
Sent: November 24, 2017 3:32 PM
To: madweld@rogers.com
Subject: Hello Madeline Weld!

Hello Madeline Weld!

Your booking for Auditorium at Main on has been cancelled.

Booking ID: 76255

For assistance, please contact infoservice@biblioottawalibrary.ca

This is Affidavit "I"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019, *PH*.

[Signature]

<https://m.facebook.com/groups/469144493124665?view=permalink&id=1605138612858575>

Fareed Khan shared Ottawa Against Fascism's note to the group: OG'LAMP Ottawa-Gatineau's Lebanese, Arabs, Muslims & Palestinians Etc.

WHY IS THE CITY OF OTTAWA COMPLICIT IN PROMOTING ISLAMOPHOBIA?

An anti-Muslim hate group is holding an event this Saturday, November 25th at the downtown main branch of the Ottawa Public Library (120 Metcalfe St.)

From 2-4 PM on Saturday, November 25th ACT for Canada -- a virulent anti-Muslim / Islamophobic far right hate group -- is hosting a Michael Hansen, a Danish videomaker who is part of an international syndicate of anti-Muslim propagandists. He is presenting an Islamophobic film at this meeting.

Below is the link to the Facebook posting about the Anti-Islamophobia rally which contains LINKS to the racist players in this event on Saturday.

BY ALLOWING THIS EVENT ON PUBLIC PROPERTY THE CITY OF OTTAWA IS NOT ONLY COMPLICIT IN PROMOTING ISLAMOPHOBIA, BUT IT IS VIOLATING THE OTTAWA LIBRARY ROOM RENTAL AGREEMENT WHICH STATES IN SECTION 33:

"The Library will not provide public space, facilities and/or properties within its jurisdiction to an individual or group that supports or promotes views, ideas or presentations which promote or are likely to promote discrimination, contempt or hatred to any person on the basis of race, national or ethnic origin, color, religion, age, sex, marital status, family status, sexual preference, or disability, gratuitous sex and violence or denigration of the human condition. The Library reserves the right to cancel a contract if any of the above-noted circumstances arise."

OTTAWA LIBRARY TERMS & CONDITIONS: <https://bibliooottawalibrary.ca/en/terms-and-conditions-0>

EMAIL OTTAWA MAYOR JIM WATSON & THE CHAIR OF THE LIBRARY BOARD COUNCILLOR TIM TIERNEY AT THE FOLLOWING ADDRESSES --
Jim.Watson@ottawa.ca / Tim.Tierney@ottawa.ca.

Ask them why the City is allowing this hate group to use a publicly funded venue in violation of its own agreement.

Below is a list of emails for other members of Ottawa City Council. Please email them. ASK THEM THE SAME QUESTION AND QUOTE THE LIBRARY VENUE AGREEMENT and ask them "WHY IS THE CITY OF OTTAWA ALLOWING A HATE GROUP TO HOLD AN ANTI-MUSLIM EVENT ON CITY PROPERTY?"

Bob.Monette@ottawa.ca
Jody.Mitic@ottawa.ca
Jan.Harder@ottawa.ca
Marianne.Wilkinson@ottawa.ca
Eli.El-Chantiry@ottawa.ca
Shad.Qadri@ottawa.ca
Mark.Taylor@ottawa.ca
Rick.Chiarelli@ottawa.ca
Keith.Egli@ottawa.ca
Diane.Deans@ottawa.ca
Mathieu.Fleury@ottawa.ca
Tobi.Nussbaum@ottawa.ca
Catherine.McKenney@ottawa.ca
Jeff.Leiper@ottawa.ca
Riley.Brockington@ottawa.ca
David.Chernushenko@ottawa.ca
Jean.Cloutier@ottawa.ca
Stephen.Blais@ottawa.ca
George.Darouze@ottawa.ca
Scott.Moffatt@ottawa.ca
Michael.Qaqish@ottawa.ca
Allan.Hubley@ottawa.ca

This needs to happen immediately.

For the sake of our children and grandchildren, and to preserve harmony and pluralism in our society we need to fight hate wherever this cancer occurs.

<https://www.facebook.com/notes/ottawa-against-fascism/a-call-to-action-for-november-25/1948939192047074/>

Ottawa Against Fascism published a note.



A CALL TO ACTION FOR NOVEMBER 25

It has come to our attention that a local far-right organization, ACT for Canada, which specializes in planning speaker presentations of anti-Muslim propagandists from abroad, is hosting another one of those events at th...

[See More](#)

This is the text:

Ottawa Against Fascism

A CALL TO ACTION FOR NOVEMBER 25

November 13 · Public

It has come to our attention that a local far-right organization, ACT for Canada, which specializes in planning speaker presentations of anti-Muslim propagandists from abroad, is hosting another one of those events at the main Ottawa Public Library on Saturday, November 25th from 2-4 pm. They are inviting Michael Hansen, a Danish videomaker who is part of an international syndicate of anti-Muslim propagandists, to entertain their audience about more of the same racist-fearmongering, trying to pin the blame on Muslims for everything. Events like this one serve also to bring together local fascists and their sympathizers, and have featured in the past the likes of the Toronto fascist academic Jordan Peterson.

The videomaker they are inviting is an associate of the International Free Press Society, a front for virulent fascist propagandizers, originating from Denmark, and which counts among its other associates Ezra Levant, of Sun TV and "Rebel" Media infamy, and James Cohen, the person behind the VladTepes blog and who makes videos for anti-Muslim organizers in Ottawa. Also involved in promoting the event is Stephanie McEvoy, a local Christian fundamentalist organizer and regular of the local anti-Muslim rallies. This is no doubt an occasion for them to whip up violence against Muslims and other groups they want to attack; yet another fascist organizing effort that must be stopped.

The film being presented itself is islamophobic, anti-migrant fear-mongering propaganda, promoting the far-right conspiracy theory that "liberals" and feminists are working together with Islamists to enable crimes against white Europeans (source 1 below). The trailer refers to the widely spread trope of an "epidemic" going on in Europe, and the film features many of the usual high-profile islamophobe and fascist personalities (see source 3 for list).

We are also aware that the Ottawa Public Library branch has in the past hosted events of the local men's rights activists, who promote a similar line of politics trying to incite violence against women. It is worth mentioning too that the OPL is located in the same building as an immigrant detention center, where the Canadian government keeps "stateless" prisoners without trial and in unlimited detention.

GENERAL CALL TO ACTION: So what can we do as a community? First of all, share this information in whatever space and whatever capacity possible. You can call the public library to let them know about this information and call to action, so they can take the appropriate course of action. Stay tuned for updates and more details!

SOURCES

Source 1:

Youtube interview with Vladtepes. <https://www.youtube.com/watch?v=HaGKk4C-XJU>

National Post article describing Vladtepes. <http://nationalpost.com/features/inside-ezra-levants-rebel-media>

Gates of Vienna feature for the interview with Vladtepes. <https://gatesofvienna.net/2017/10/the-missing-dane-killing-europe/>

The daily stormer is the most popular international neo-Nazi forum on the internet. They are named after the Nazi Party's newspaper Der Stürmer. Here they feature the interview with Vladtepes. <https://web.archive.org/save/https://dstormer6em3i4km.onion.link/interview-with-killing-europe-maker-michael-hansen/>

Source 2:

Film trailer on youtube. The trailer also made its rounds on the far-right corner of the internet.
https://www.youtube.com/watch?time_continue=1&v=eBW_M0evFh8

BareNakedIslam (website tagline: "It isn't Islamophobia when they really ARE trying to kill you") feature of the trailer.

<https://web.archive.org/save/http://barenakedislam.com/2017/10/03/killing-europe/>

Source 3:

http://www.imdb.com/title/tt7547662/fullcredits?ref_=tt_cl_sm#cast

Selected cast members:

Lars Hedegaard, journalist

NY Times: "Lars Hedegaard, Anti-Islam provocateur"

<http://www.nytimes.com/2013/02/28/world/europe/lars-hedegaard-anti-islamic-provocateur-receives-support-from-danish-muslims.html>

Frauke Petry, former chair of the Alternative For Germany Party (AfD), far-right nationalist party.

Trying to popularize Nazi slogans: <http://www.bbc.com/news/world-europe-37337927>

New Yorker: "Germany's most significant right-wing force since the Nazis."

<https://www.newyorker.com/magazine/2016/10/03/the-new-star-of-germanys-far-right>

Paul Weston, chair of Liberty GB (far-right nationalist party) and Pegida UK (Patriotic Europeans Against the Islamisation of the West)

Arrested for hate speech: <http://www.bbc.com/news/uk-england-hampshire-27186573>

David Coleman of Migration Watch UK

The Guardian: "we know that: a) Coleman is a eugenicist; and b) he is against immigration."

<https://www.theguardian.com/commentisfree/2007/mar/16/watchingdavidcoleman1>

Source 4:

Screenshots of event shared on Georges Hallak and Steven Myatt's pages. These two are far-right organizers. More info on them can be provided on request, but these two are heavily featured in the ARC blog (anti-racistcanada.blogspot.com).

<https://www.facebook.com/RealSteven...>

Nov 3rd 2017 Act For Canada online newsletter. 20 pages of anti-islam, anti-leftist "news".

Opening headline: "Diversity is our terror"

<https://web.archive.org/web/20171110235720/http://www.actforcanada.ca/wp-content/uploads/ACT-For-Canada-Newsletter-November-3-2017.pdf>

Source 5 :

On Jordan Peterson's ties to fascist and his own practice of violently targeting leftists and marginalized groups. <https://thevarsity.ca/2017/11/11/wilful-blindness-to-petersons-antics-verges-on-impunity/>

street address of main OPL branch, the one where this event is, so there is no confusion?
[Like](#) · [React](#) · [Reply](#) · [Report](#) · Nov 18 at 11:59pm

Ottawa Against Fascism
It's at the corner of Laurier and Metcalfe
[See all 2 replies](#)

Shawn Smith

The largest facebook page for Arabs and Muslim in Ottawa is:
<https://www.facebook.com/groups/ottawaolamp/>

OG'LAMP Ottawa-Gatineau's Lebanese, Arabs, Muslims & Palestinians Etc.

[5,170 Members](#)


[Like](#) · [React](#) · [Reply](#) · [Report](#) · Nov 21 at 2:37pm

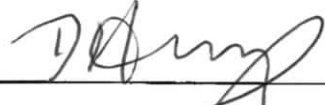
Shawn Smith

The event has been cancelled. Thanks to those who wrote to the City. Richard Warman's email had the necessary impact. If you have a moment, please write to him and thank him for standing up for our communities. His email is richardwarman@yahoo.ca
[Like](#) · [React](#) · [Reply](#) · [Report](#) · Yesterday at 1:42pm [Friday, November 24]

This is Affidavit "J"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019, 



<https://www.facebook.com/notes/ottawa-against-fascism/a-call-to-action-for-november-25/1948939192047074/>

Ottawa Against Fascism published a note.



A CALL TO ACTION FOR NOVEMBER 25

It has come to our attention that a local far-right organization, ACT for Canada, which specializes in planning speaker presentations of anti-Muslim propagandists from abroad, is hosting another one of those events at th...

[See More](#)

Ottawa Against Fascism

A CALL TO ACTION FOR NOVEMBER 25

November 13 · Public

It has come to our attention that a local far-right organization, ACT for Canada, which specializes in planning speaker presentations of anti-Muslim propagandists from abroad, is hosting another one of those events at the main Ottawa Public Library on Saturday, November 25th from 2-4 pm. They are inviting Michael Hansen, a Danish videomaker who is part of an international syndicate of anti-Muslim propagandists, to entertain their audience about more of the same racist-fearmongering, trying to pin the blame on Muslims for everything. Events like this this one serve also to bring together local fascists and their sympathizers, and have featured in the past the likes of the Toronto fascist academic Jordan Peterson.

The videomaker they are inviting is an associate of the International Free Press Society, a front for virulent fascist propagandizers, originating from Denmark, and which counts among its other associates Ezra Levant, of Sun TV and "Rebel" Media infamy, and James Cohen, the person behind the VladTepes blog and who makes videos for anti-Muslim organizers in Ottawa. Also involved in promoting the event is Stephanie McEvoy, a local Christian fundamentalist organizer and regular of the local anti-Muslim rallies. This is no doubt an occasion for them to whip up violence against Muslims and other groups they want to attack; yet another fascist organizing effort that must be stopped.

The film being presented itself is islamophobic, anti-migrant fear-mongering propaganda, promoting the far-right conspiracy theory that "liberals" and feminists are working together with Islamists to enable crimes against white Europeans (source 1 below). The trailer refers to the widely spread trope of an "epidemic" going on in Europe, and the film features many of the usual high-profile islamophobe and fascist personalities (see source 3 for list).

We are also aware that the Ottawa Public Library branch has in the past hosted events of the local men's rights activists, who promote a similar line of politics trying to incite violence against women. It is worth mentioning too that the OPL is located in the same building as an immigrant

detention center, where the Canadian government keeps "stateless" prisoners without trial and in unlimited detention.

GENERAL CALL TO ACTION: So what can we do as a community? First of all, share this information in whatever space and whatever capacity possible. You can call the public library to let them know about this information and call to action, so they can take the appropriate course of action. Stay tuned for updates and more details!

SOURCES

Source 1:

Youtube interview with Vladtepes. <https://www.youtube.com/watch?v=HaGKk4C-XJU>

National Post article describing Vladtepes. <http://nationalpost.com/features/inside-ezra-levants-rebel-media>

Gates of Vienna feature for the interview with Vladtepes. <https://gatesofvienna.net/2017/10/the-missing-dane-killing-europe/>

The daily stormer is the most popular international neo-Nazi forum on the internet. They are named after the Nazi Party's newspaper Der Stürmer. Here they feature the interview with Vladtepes. <https://web.archive.org/save/https://dstormer6em3i4km.onion.link/interview-with-killing-europe-maker-michael-hansen/>

Source 2:

Film trailer on youtube. The trailer also made its rounds on the far-right corner of the internet. https://www.youtube.com/watch?time_continue=1&v=eBW_M0evFh8

BareNakedIslam (website tagline: "It isn't Islamophobia when they really ARE trying to kill you") feature of the trailer.

<https://web.archive.org/save/http://barenakedislam.com/2017/10/03/killing-europe/>

Source 3:

http://www.imdb.com/title/tt7547662/fullcredits?ref=tt_cl_sm#cast

Selected cast members:

Lars Hedegaard, journalist

NY Times: "Lars Hedegaard, Anti-Islam provocateur"

<http://www.nytimes.com/2013/02/28/world/europe/lars-hedegaard-anti-islamic-provocateur-receives-support-from-danish-muslims.html>

Frauke Petry, former chair of the Alternative For Germany Party (AfD), far-right nationalist party.

Trying to popularize Nazi slogans: <http://www.bbc.com/news/world-europe-37337927>

New Yorker: "Germany's most significant right-wing force since the Nazis."

<https://www.newyorker.com/magazine/2016/10/03/the-new-star-of-germanys-far-right>

Paul Weston, chair of Liberty GB (far-right nationalist party) and Pegida UK (Patriotic Europeans Against the Islamisation of the West)

Arrested for hate speech: <http://www.bbc.com/news/uk-england-hampshire-27186573>

David Coleman of Migration Watch UK

The Guardian: "we know that: a) Coleman is a eugenicist; and b) he is against immigration."

<https://www.theguardian.com/commentisfree/2007/mar/16/watchingdavidcoleman1>

Source 4:

Screenshots of event shared on Georges Hallak and Steven Myatt's pages. These two are far-right organizers. More info on them can be provided on request, but these two are heavily featured in the ARC blog (anti-racistcanada.blogspot.com).

<https://www.facebook.com/RealSteven...>

Nov 3rd 2017 Act For Canada online newsletter. 20 pages of anti-islam, anti-leftist "news".
Opening headline: "Diversity is our terror"

<https://web.archive.org/web/20171110235720/http://www.actforcanada.ca/wp-content/uploads/ACT-For-Canada-Newsletter-November-3-2017.pdf>

Source 5 :

On Jordan Peterson's ties to fascist and his own practice of violently targeting leftists and marginalized groups. <https://thevarsity.ca/2017/11/11/wilful-blindness-to-petersons-antics-verges-on-impunity/>

26

Connor Grant

street address of main OPL branch, the one where this event is, so there is no confusion?
[Like](#) · [React](#) · [Reply](#) · [Report](#) · Nov 18 at 11:59pm

Ottawa Against Fascism

It's at the corner of Laurier and Metcalfe

[See all 2 replies](#)

Shawn Smith

The largest facebook page for Arabs and Muslim in Ottawa is:

<https://www.facebook.com/groups/ottawaolamp/>

OG'LAMP Ottawa-Gatineau's Lebanese, Arabs, Muslims & Palestinians Etc.

5,170 Members

[Like](#) · [React](#) · [Reply](#) · [Report](#) · Nov 21 at 2:37pm

Shawn Smith

The event has been cancelled. Thanks to those who wrote to the City. Richard Warman's email had the necessary impact. If you have a moment, please write to him and thank him for standing up for our communities. His email is richardwarman@yahoo.ca

[Like](#) · [React](#) · [Reply](#) · [Report](#) · Yesterday at 1:42pm [Friday, November 24]

This is Affidavit "K"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019, *DAH*

DAH

<http://www.richardwarman.ca/>

Latest:

23 November 2017 – letter of concern to Ottawa Mayor Jim Watson, Members of the Ottawa Public Library Board of Directors, and Library Management:

Dear Mayor Watson, Councillors Tierney and McKenney, Members of the Ottawa Library Board, Ms. McDonald, Ms. Désormeaux, and Mr. Westenbroek:

I am writing to you with regard to media reports of a room booking at the main Ottawa public library on Saturday by a group calling itself 'Act For Canada' to show a film called "KILLING EUROPE" [sic]. I am writing because there has clearly been a mistake in that the initial media reports indicate that the library intends to permit the booking to proceed despite it being in clear violation of the library's own rental policy prohibiting the use of space for discriminatory purposes (excerpt below).

Indeed, that library policy simply restates the library and the City of Ottawa's legal responsibilities under s. 1 of the Ontario Human Rights Code that bars discrimination in the provision of services on the basis of prohibited grounds including race, place of origin, colour, ethnic origin, citizenship, and creed that are relevant in this case.
(see: <https://www.ontario.ca/laws/statute/90h19>)

After learning of the purported event, I conducted 5-minutes of rudimentary online research about the film and 'Act For Canada'. The messages that can clearly be seen from even the short 3-minute trailer for the film "KILLING EUROPE" include that immigrants engage in gang rape and that Muslims perpetrate massacres.
(see: https://www.youtube.com/watch?v=eBW_M0evFh8)

With regard to the group 'Act For Canada', I attach a copy of their latest November newsletter that publishes what is clearly anti-Muslim and anti-immigrant hate propaganda including:

p8 – grotesque cartoon caricatures of blacks, "pakis", and "illegals"

...

p10 "What we have seen in Sweden, Germany, Italy, Britain, France, Ireland are injections of unskilled immigrants costing billions of dollars in welfare expenses, continuous terrorist acts by Muslims, and persistent incidents of sexual assaults and gang rapes against white women."

...

p15 "The more non-Muslims are killed, abused and enslaved, the more the truth of Islam and the supremacy of Allah are proven with the screams of the wounded, the dying and the families of the dead. This is Islam. This is what it was in 628. That's what it is today. "Allahu Akbar" is a mandate to kill non-Muslims. A Muslim terrorist taking a gun, a knife or a truck and attacking non-Muslims is living out, "Allahu Akbar". He's showing that Islam is superior." [all sic]

Ottawa is renowned as a cosmopolitan, multicultural, and welcoming place. Libraries are intended to expand human knowledge and understanding, not to be used as platforms for those who disseminate hate propaganda against our Muslim neighbours.

I urge you in the strongest possible terms to correct the media's mistaken impression that the rental by 'Act For Canada' to show 'KILLING EUROPE' on Saturday at the main Ottawa public library will be allowed to happen there, or anywhere else on City of Ottawa property. I am deeply concerned that if the event is permitted to proceed, it would constitute a breach of s. 1 of the Ontario Human Rights Code.

I look forward to hearing from you as soon as possible.

Sincerely,

Richard Warman
Barrister and Solicitor
Ottawa
—

<https://bibliooottawalibrary.ca/en/terms-and-conditions-0>

The Library will not provide public space, facilities and/or properties within its jurisdiction to an individual or group that supports or promotes views, ideas or presentations which promote or are likely to promote discrimination, contempt or hatred to any person on the basis of race, national or ethnic origin, color, religion, age, sex, marital status, family status, sexual preference, or disability, gratuitous sex and violence or denigration of the human condition. The Library reserves the right to cancel a contract if any of the above-noted circumstances arise.

cc: Ottawa Citizen
National Post
CBC
Global News
Metro News
—

This is Affidavit "L"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019,

DAW

DAW

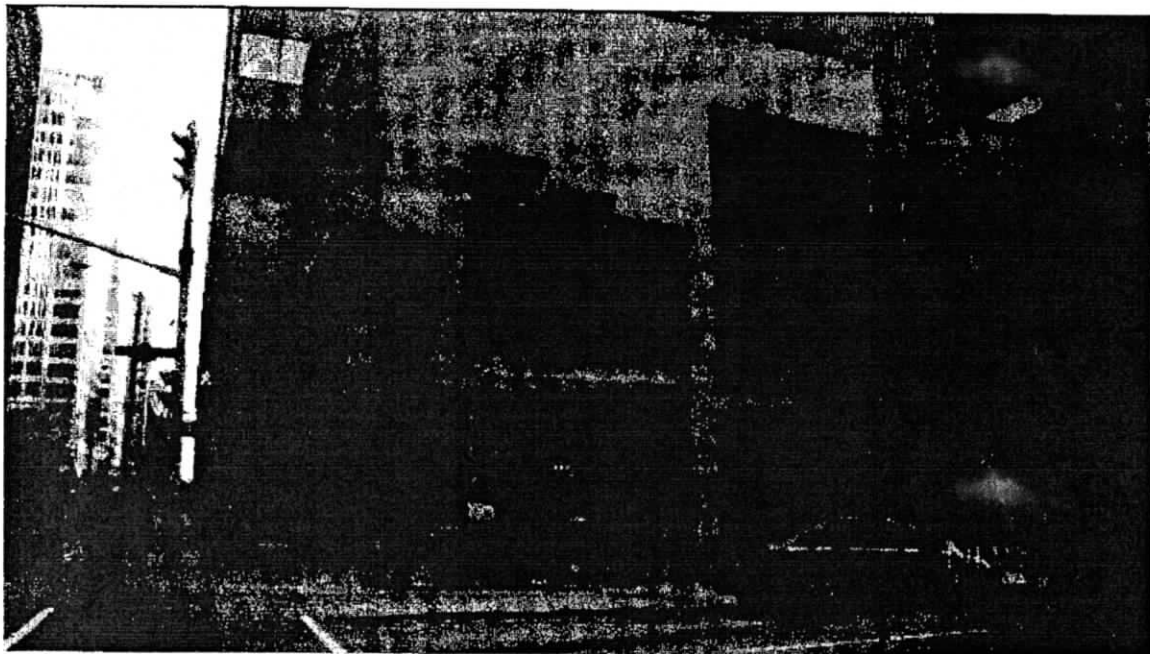
(<http://www.iheartradio.ca/580-cfra>)

OTTAWA PUBLIC LIBRARY CANCELS SCREENING OF CONTROVERSIAL 'KILLING EUROPE' FILM

(/Author/Author/Ted Raymond)

TED RAYMOND

Friday, November 24th 2017 - 5:48 pm



NEWS WITH ROB SNOW ([HTTP://WWW.IHEA...](http://www.iheartradio.ca/580-cfra/news/ottawa-public-library-cancels-screening-of-controversial-killing-europe-film-1.3461202))

Interact



A controversial 2017 film will not be screened at the Ottawa Public Library this Friday.

A group called ACT! for Canada had planned to rent a room in order to screen a movie called "Killing Europe" at the main branch downtown.

A description of the film, by Danish ex-patriate Michael Hansen, says, "Terrorist attacks, riots, and gang rapes are striking at the very foundations of Europe. This is the story of a Danish expatriate and his quest to uncover the growing issues within the European society he left 15 years ago." A trailer for the movie show snippets of interviews that decry so-called "no-go zones," media coverage of terrorist attacks, and a warning that the filmmaker will be called a Nazi simply for making the film.

Library Board Chair councillor Tim Tierney tells Newstalk 580 CFRA's *Ottawa Now* he had heard several complaints about the planned screening and brought those to the attention of Library staff.

"I try not to interfere with the day-to-day operations of the library," Tierney says. "That being said, we do have policies and procedures and I've heard from our labour council in Ottawa, I've heard from our unions, that there's concern. I brought it to the attention of our CEO, Danielle McDonald, she looked at our policies and procedures, which includes the police actually viewing it, the staff viewing it; it passed those tests, but there were some other hurdles that were there and we decided that the best decision was we aren't going to show the movie."

Tierney says he applauds the decision by Library staff and he has already received positive feedback about it.

"We're not about closing out people's views on things, but this one doesn't pass the test," he said.

Tierney likens the argument about freedom of expression at the Library to the recent controversy about the Library's pornography policy (<http://ottawa.ctvnews.ca/mom-says-plan-to-police-porn-at-library-isn-t-strict-enough-1.3596957>).

"We actually have a very strict set of policies and procedures. If you want to rent a room, you have to go through all of those gates," he says. "This isn't the first time this has happened; this is a perennial favourite. A lot of people come in to our libraries and use them for a lot of educational purposes. That will always continue. But, again, we have policies and procedures, the CEO executes those, and in this case, they've decided to rescind on the rental of the room and, again, I support our CEO on that."

The group ACT! for Canada claims their mission is to speak out "in defense of our democratic values, our security and our liberty against the rise of Islamism." The group's website makes the distinction between "Islam as a personal faith" and "Islamism as a political ideology" and says "a failure to understand this and maintain the distinction is the strategic reason since 9/11 why the West is failing to confront this threat globally."

Keywords:

580 CFRA (/subject/Station/580 CFRA)

Ottawa Now with Evan Solomon (/subject/Show/Ottawa Now with Evan Solomon)

Politic and society (/subject/categorie/Politic and society) Ottawa (/subject/Location/Ottawa)

Interact

This is Affidavit "M"

In the Affidavit of Madeline Weld

Sworn before me this 10th day of August, 2019,

DAZ

DAZ



YOUR PROJECT OUR EXPERTS

JANUARY 12
BMO Centre Stan

Calgary ▼

metro

› HOME

› NEWS

Calgary
Canada
World

› VIEWS

› ENTERTAINMENT

› LIFE

› WHEELS.CA

› BUSINESS

› SPORTS

› YOUR HOME

› HOROSCOPES

› GAMES

› FEATURES

› SPECIAL
FEATURES

› CONTESTS

› FLYERS

Calgary, Ontario

Filmmaker behind 'Killing Europe' criticizes cancellation

Metro spoke with Michael Hansen, the director of Killing Europe, who believes that the library cancelling the screening of his film was an attack on free speech



A screenshot from the film 'Killing Europe,' which the Ottawa Public Library is allowing a screening of on Saturday.

By: Kieran Delamont Metro | Published: Sat 10:42 AM 2017

The Ottawa Public Library cancelled a scheduled screening of an anti-Islamic film on Saturday after criticism the film violated the library's community standards.

ACT! for Canada, a right-wing organization that considers itself a defender "against the rise of Islamism," had scheduled the premiere of Danish filmmaker Michael Hansen's documentary "Killing Europe," a film about the impact of "Islamic migration" on European society and, said Hansen, the threat to free speech from left-wing organizations.

On Thursday, library officials still planned on hosting the screening on Saturday, despite mounting criticism. But by Friday afternoon, they had decided to cancel it altogether.

"We took a closer look at the material, and reviewed our policy, and decided it's the type of material we don't want displayed on our property," said Tim Westenbroek,

CALGA
RENOVA
SHO

SAVE
BUY TICKETS

COURTESY OF



CLICK HE

Most Popular



Omar Khadr
it true that t
Canada ten



Dozens cha
Nova Scotia
drugs, guns



Update: Cal
group threa
action after
swim



G+

reddit this!

"By de-platforming the world premiere of 'Killing Europe,' the City of Ottawa and the Ottawa Public Library are permitting the perpetuation of these abuses are permitting themselves to be tools of institutionalized oppression," said Alexandra Belaire from ACT! for Canada, in a statement.

Neither Belaire nor a representative for ACT! for Canada could not be reached for comment on Sunday.

Hansen said on Sunday that he felt the backlash was unwarranted since few people had actually watched the film, and that cancelling the screening was both "Orwellian" and tantamount to censorship.

"My biggest problem is that my film got basically banned there, without anyone having watched it," he said. "If you don't allow open debate, eventually you are going to see real hate speech, you're going to see real Nazis.

"It's ironic—a movie that's about free speech gets shut down," he said.

Hansen extended an offer to Ottawa Against Fascism, saying he would "gladly do a screening with them," if they were open to it.

"If they will have me, I will do a screening with them, and then we can have a discussion," he said.

Vincent Cama, a member of the Industrial Workers of the World, said that "despite the positive outcome in this instance [...] we'd like to know how much of this decision was based on the pressure exerted by the board. [...] We continue to have concerns that management at the OPL did not undergo proper due diligence in this matter."

Editors' Picks

Metro Cities Roundup: Spider Beetle lives, Gregor is out and Calgary sees shepherds



Settle your web presence — and other end-of-life lessons on the Swedish way to die



Metro Science: Astronauts' back problems, oceans on Mars, and fake news from space



These six simple diet hacks will help you drop the pounds in 2018: Reisman



More on Metronews.ca



What's E.coli doing in my flour?



New mortgage guidelines: Splitting the bill the fair way



How SF fixed parking for everyone



5 things to know
From Halifax
Centre to co

Ottawa Views



Views

Ottawa Public Health war
Nile cases

RENT



New mortgage regulations show
renters



How to prep for food
science success

These
hacks



Is your smartphone on
Canada's fastest w...

Know
war



 Tweet

G+

 reddit this!

YOUR PROJECT OUR EXPERTS



Metro Cities
Solving No.1 problem
plaguing cities



Free \$20 Gift Card
With any purchase of
\$250 at Basha Foods



Infant Etiquette
Do I need to visit my
friend's baby?



Urban Etiquette
The top 10 transit
etiquette breaches



Recipe
Jazz up that classic tuna
melt



My Mo
Not fair

About

[About Us](#)
[Contact](#)
[Careers](#)
[RSS Feeds](#)

Terms

[Advertising Terms](#)
[Terms and Conditions](#)
[Privacy Policy](#)

Metronews.ca

[My Metro Store](#)
[Contests](#)
[Metro Panel](#)
[Special Features](#)
[FAQ](#)
[Glossary](#)

DIVISIONAL COURT FILE NUMBER:

MADELINE WELD and VALERIE THOMAS

v.

OTTAWA PUBLIC LIBRARY

Applicants

Respondent

ONTARIO
SUPERIOR COURT OF JUSTICE
(Divisional Court)
Proceedings commenced at Toronto

AFFIDAVIT OF MADELINE WELD

Alan Honner
Barrister & Solicitor
3416 Dundas Street West
Unit 201
Toronto, ON M6S 2S1

T: 416 303 6487
F: 416 352 5255

LSO: 60985W

Counsel for the Justice Centre for
Constitutional Freedoms
Lawyers for the Applicants