

**ONTARIO SUPERIOR COURT OF JUSTICE  
(Ottawa)**

B E T W E E N:

**CAMPAIGN LIFE COALITION and MAEVE ROCHE**

**Applicants**

- and -

**PARLIAMENTARY PROTECTIVE SERVICE**

**Respondent**

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**AFFIDAVIT OF [REDACTED]**  
*Sworn April 25, 2025*

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I, [REDACTED], of the [REDACTED], in the Province of Ontario, SOLEMNLY AFFIRM as follows:

*Educational and employment background*

1. I have studied and researched in the field of reproductive rights since 1996. I am a Medical Doctor and hold a DPhil in Middle Eastern Studies.

2. I completed my undergraduate degree in International Relations and Biology at Stanford University in the United States in 1996. My thesis was on comprehensive women's healthcare in Palestine. I continued studying in this area during my Master of Arts in International Policy Studies at Stanford University.

3. I completed my DPhil in Middle Eastern Studies with disciplinary training in public health and medical anthropology from the University of Oxford in 2001. I attended Oxford University as a Rhodes Scholar. My doctoral dissertation and post-doctoral research focused on women's comprehensive health care in Tunisia.

4. I received a medical degree from Harvard Medical School in 2006. During medical school I received high volume training in first trimester abortion provision in four different practice settings in Massachusetts and trained in the provision of medication abortion provision with mifepristone/misoprostol soon after the U.S. Food and Drug Administration approved the regimen in 2000.

5. From 2002 until 2011, I worked at Ibis Reproductive Health — a non-governmental research organization in Cambridge, Massachusetts. I led a program of work dedicated to sexual and reproductive health in the Middle East and North Africa and in humanitarian settings.

6. Since 2011 I have been an associate professor, then tenured professor, and then full professor at the School of Interdisciplinary Health Sciences in the Faculty of Health Sciences at the University of Ottawa. I am a global sexual and reproductive health social science and public health researcher. My action- and intervention-oriented research program focuses on emergency contraception, abortion, and health professions education. I currently lead projects in 22 countries in Africa, Asia, Europe, the Middle East and North Africa, and North America.

7. Since joining the University of Ottawa in 2011, I have developed an interdisciplinary program of work dedicated to abortion research in Canada. This includes completion of a large-scale qualitative study dedicated to the experiences of Canadian abortion patients prior to the approval of the mifepristone/misoprostol medication abortion regimen and research with both patients and providers after the introduction of Mifegymiso. In 2020, I received a multi-year

foundation grant to conduct a series of studies dedicated to documenting, implementing, and evaluating innovative and de-medicalized abortion medication delivery practices in Canada.

8. The following is a selective summary of my impact on research in the area of sexual and reproductive health since 2011:

- 2024-2029 – University Research Chair in Medication Abortion Studies at the University of Ottawa
- 2011-2016 – Endowed Chair in Women’s Health Research at the University of Ottawa
- 144 peer-reviewed journal reports, H-index of 28, i-10-index of 74
- 138 invited lectures and presentations in 16 countries
- CAD6.6 million in extramural grants and research support
- Editor-in-Chief, *Perspectives on Sexual and Reproductive Health*
- Inducted Fellow of the Canadian Academy of Health Sciences
- Recipient of the Leadership Award for Excellence in Women and Children’s Health (Canadian Partnership for Women and Children’s Health (CanWaCH))
- Recipient of the Darroch Award for Excellence in Sexual and Reproductive Health Research (Guttmacher Institute)
- Honorary Member of the Federation of Medical Women of Canada

9. I attach my CV, current to August 2024, as **Exhibit “A”** to my affidavit.

Past experience as an expert

10. I provided an expert affidavit in Canada once before in 2020 in the case *Rev. Anthony van Hee and the Catholic Civil Rights League v. Her Majesty the Queen in Right of Ontario* (CV-19-80325). My understanding is that Rev. van Hee and the Catholic Civil Rights League challenged the constitutionality of Bill 163, *Protecting a Woman’s Right to Access Abortion Services Act, 2017*. My opinion evidence in that case related primarily to a study done in June 2019 by my group

at the University of Ottawa in collaboration with NAF Canada. We received a Social Sciences and Humanities Research Council (SSHRC) Partnership Engage Grant to document and explore the relationship between safe access zone laws and protests and violence at abortion providing facilities across Canada. I was asked by the Ontario government to provide expert evidence about this research as well as: (a) the history of anti-abortion protests in Canada; (b) the nature and extent of current trends in anti-abortion protest in Ontario and Canada; (c) any impacts of anti-abortion protest outside abortion-providing facilities or at provider homes on the safety, security, physical and mental health and privacy of patients, providers and access to abortion generally; and (d) the effects of safe access zones outside abortion-providing facilities or provider homes.

11. I was cross-examined in relation to my affidavit in that case. I was not required to provide testimony in court. My qualifications and expertise were not challenged.

Expert declaration

12. I understand the role of an expert in a court proceeding. I swear that any evidence I give as part of this Court proceeding, including this affidavit, will be impartial, independent, and unbiased. I will only provide opinion evidence in this case related to matters within my area of expertise: sexual and reproductive health social science and public health.

13. I have been asked to provide opinion evidence about: (1) the impact, if any, of anti-abortion imagery on members of the public; and (2) the accuracy and utility of the results reported in the report written by [REDACTED], “A Statistical Analysis on the Effectiveness of Abortion Victim Photography in Pro-Life Activism”.

*Current research on the impact of anti-abortion imagery on members of the public*

14. I am currently working on a research project studying the impacts of anti-abortion imagery on members of the public with my team of graduate students. As the University Research Chair in Medication Abortion Studies, I have a discretionary research budget to undertake research questions from community groups and build proposals for research studies. The impetus for the study came from several municipalities across Canada that are reviewing their policies that limit public displays of anti-abortion imagery — such as bus ads and pamphlets left at people’s homes. There is currently no published research in Canada focusing on the harms these types of graphic images have on members of the public. The types of anti-abortion images at issue in this research project involve alleged aborted fetuses of the same type as the three posters at issue in this case — bloody, graphic, and/or mutilated. I have reviewed and attached the posters as **Exhibit “B”**.

15. This study has three phases: (1) a scoping review of scientific literature available on the topic; (2) a case study involving in-depth interviews with individuals who have encountered these graphic anti-abortion images in their communities in St Catharines, Ontario; and (3) a policy review to assess the regulation of graphic anti-abortion advertisements at the local, provincial, and federal level.

16. We have completed the review of international authorities as part of the scoping review. We identified sources from across different countries that studied the impacts of anti-abortion imagery on people. From the 2,112 international sources located, and through subsequent filtering, we identified four themes about the use of anti-abortion imagery in public: (1) use of purposely deceptive fetal imagery in advertisements; (2) that anti-abortion advertisements are largely ineffective; (3) that some countries have successfully regulated graphic anti-abortion

advertisements; and (4) that anti-abortion groups disseminating graphic abortion advertisements are potentially linked globally. I have attached our preliminary scoping review summary as **Exhibit “C”**.

17. We have completed a proposal for the next two phases of the study for a SSHRC grant. I attach the substantive part of our proposal as **Exhibit “D”**.

18. As part of the development of the study methodology, we did a preliminary review of complaints provided to us about graphic anti-abortion image pamphlets that were passed out door to door. Based on the preliminary review of the complaints, I can provide a preliminary opinion on the trends we saw in the data.

19. There were two main groups who complained about harms from the graphic anti-abortion pamphlets delivered to their houses. First, parents of young children or people concerned about children’s welfare. This group expressed concern that young children would see the graphic images without context and that the pamphlets would be disturbing to the children. Some complainants reported that their children found the flyers and were traumatized by the bloody, graphic images. Some complaints included concerns that the images were not age-appropriate and forced conversations with children about what they had seen — before the children were ready or could fully understand. Some complainants disclosed that they had been deeply traumatized by seeing graphic anti-abortion images as children and were concerned other children would be traumatized too.

20. Second, women who have had abortions, are pregnant, or have experienced pregnancy loss. These women expressed how upsetting and traumatizing — or re-traumatizing — being forced to see the graphic images was. They express how difficult it is to be reminded of the experience and

re-traumatized by the graphic images that are sometimes accompanied with words like “murder”. Some of the complainants were women who had an abortion after being raped and becoming pregnant. Some complainants disclosed that they had suffered recent pregnancy loss and that seeing the graphic images was horrifying and emotionally devastating after the loss of their child. Some complainants expressed that they were physically sick after seeing the graphic images.

21. I attach a representative sample of complaints (without names, for the complainant’s privacy) as **Exhibit “E”**.

22. Based on the complaints I reviewed and the scoping review, I am comfortable concluding that graphic anti-abortion imagery can be deeply upsetting for members of the public, especially parents of young children and those concerned for children’s welfare. In addition, unwanted receipt of these images can have negative psychological impacts, especially on young children, women who have had abortions or experienced pregnancy loss, and women who have become pregnant from sexual violence and had abortions.

#### **Report**

23. For the purpose of my expert opinion, I reviewed [REDACTED] affidavit and report, “A Statistical Analysis on the Effectiveness of Abortion Victim Photography in Pro-Life Activism”, attached as **Exhibit “F”**.

24. [REDACTED] report does not present as an objective, scientific study that I would be comfortable relying on as accurate. I urge tremendous caution in relying on the results reported in [REDACTED] report for four reasons:

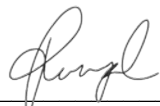
- a) The design of the study is fatally flawed. The ‘before’ and ‘after’ samples were not the same people so the study was not truly measuring attitudinal change, as alleged. The study asked the same questions of 845 people before the campaign. It then asked a different group of 896 people after. The report’s claim that comparing these different groups shows changes in public opinion is methodologically questionable. There are so many unknown variables about who was polled to determine whether each group was similarly representative of the public such that the groups can be compared. Without asking the same people their opinion before and after being shown the anti-abortion imagery, this study cannot accurately say it measured attitudinal change. The methodology is neither scientific nor reliable.
  
- b) The report does not share what questions survey participants were asked. There has been a large amount of research over the last decade on opinion polling around abortion in the United States. This research has demonstrated that the wording of questions has a significant impact on how people respond to abortion related questions. How questions are worded can skew answers. There is nothing in this report that suggests the group who collected the data used best practices in survey item construction or attempted to mitigate bias.
  
- c) The report’s language suggests the “study” was not objective. For example, the report uses biased language such as “pro-abortion” instead of the more neutral and widely understood term, “pro-choice”. As well, it includes the term “abortion victim images” instead of a neutral term such as “abortion imagery” or “anti-abortion imagery”. Another example of language suggesting the study is skewed is the description of the activism undertaken by the group that commissioned the study, the Canadian Centre for Bio-Ethical Reform (endthekilling.ca). The description includes language such as conducting “genocide awareness”, seemingly likening abortion to genocide (p. 8). Other examples of biased language include the “lives saved”/“saving lives” phraseology — see for example:
  - i. The opening sentences of the report on p. 1: “The use of abortion victim imagery in pro-life outreach is perhaps one of the most enduring debates within the pro-life movement. Although proponents cite cases of lives saved and minds changed supporting the effectiveness of the strategy, opponents insist these images impede public receptiveness to other strategies they claim could save more lives.”
  - ii. This quote on p. 22: “This suggests that changing how the public feels about abortion impacts how they vote for candidates willing and able to enact legal restrictions that actually save lives.”



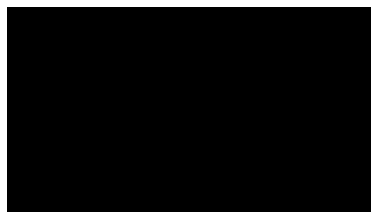
Using language skewed towards one perspective throughout the study strongly suggests the study itself was not conducted objectively.

- d) The report has not been peer-reviewed and, for the reasons above, I do not believe it would be published in a peer-reviewed journal. This report has not undergone the rigours of review by other academics and been approved for publication. This is the standard for reliable scientific studies. I have extensive experience reviewing reports for potential publication. I am the Editor-in-Chief of Perspectives on Sexual and Reproductive Health, a former Deputy Editor (and current editorial board member) at Contraception, and a former editorial board member of Maternal Child Health Journal. I can say with confidence that a manuscript based on this study design would be desk rejected by all three of these journals for the issues detailed above.

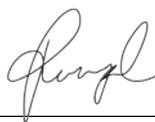
Sworn virtually at the [REDACTED] in the  
Province of Ontario in accordance with O.  
Reg. 431/20, *Administering Oath or  
Declaration Remotely* before me at the [REDACTED]  
[REDACTED] in the Province of Ontario, this 25<sup>th</sup>  
day of April, 2025.



**Jocelyn Rempel, a commissioner  
of oaths (LSO#: 82895Q)**



This is **Exhibit “A”** referred to  
in the Affidavit of [REDACTED]  
sworn remotely before me this 25<sup>th</sup> day of April, 2025



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**Jocelyn Rempel, a commissioner of oaths**  
**(LSO#: 82895Q)**

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]



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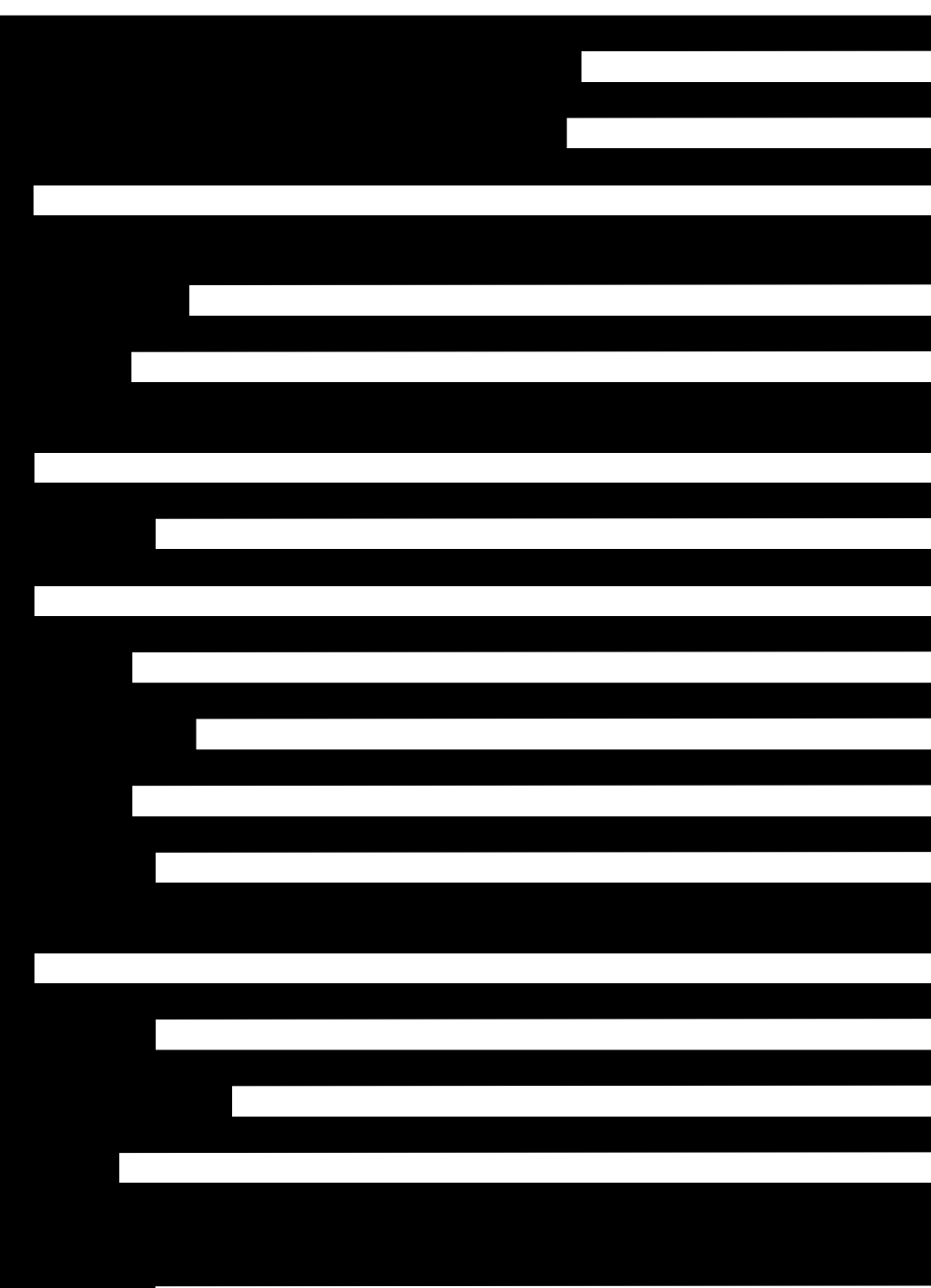
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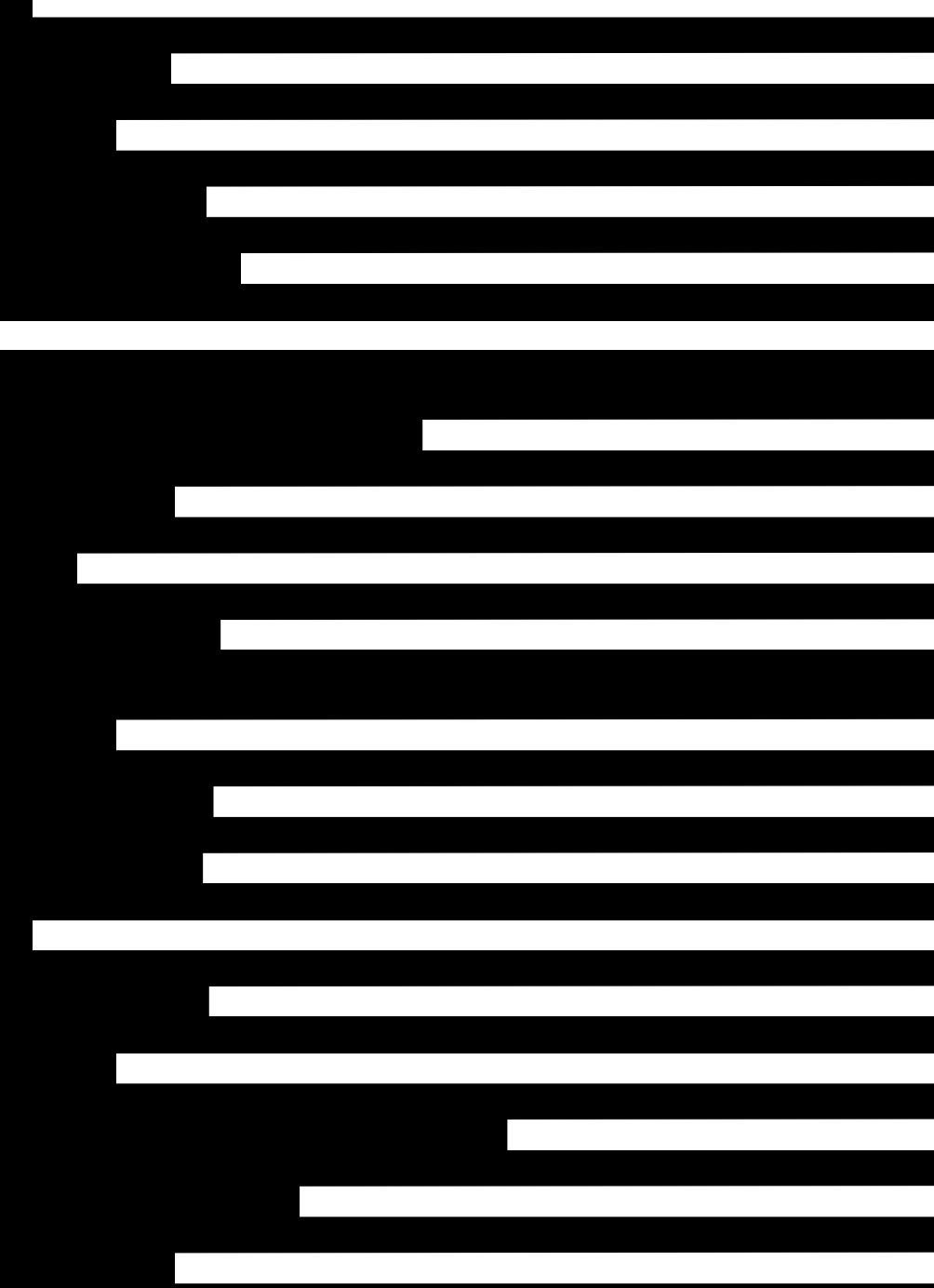
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Overall Summary				
Category A		Category B		
Sub-Category A1	Sub-Category A2	Sub-Category B1	Sub-Category B2	Sub-Category B3
Item A1.1	Item A1.2	Item B1.1	Item B1.2	Item B1.3
Item A2.1	Item A2.2	Item B2.1	Item B2.2	Item B2.3
Item A3.1	Item A3.2	Item B3.1	Item B3.2	Item B3.3
Item A4.1	Item A4.2	Item B4.1	Item B4.2	Item B4.3
Item A5.1	Item A5.2	Item B5.1	Item B5.2	Item B5.3
Item A6.1	Item A6.2	Item B6.1	Item B6.2	Item B6.3
Item A7.1	Item A7.2	Item B7.1	Item B7.2	Item B7.3
Item A8.1	Item A8.2	Item B8.1	Item B8.2	Item B8.3
Item A9.1	Item A9.2	Item B9.1	Item B9.2	Item B9.3
Item A10.1	Item A10.2	Item B10.1	Item B10.2	Item B10.3
Item A11.1	Item A11.2	Item B11.1	Item B11.2	Item B11.3
Item A12.1	Item A12.2	Item B12.1	Item B12.2	Item B12.3

[REDACTED]

[REDACTED]

[REDACTED]





1	1	1	1	1	1	1
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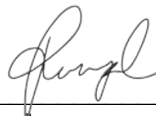
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This is **Exhibit “B”** referred to  
in the Affidavit of [REDACTED]  
sworn remotely before me this 25<sup>th</sup> day of April, 2025



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**Jocelyn Rempel, a commissioner of oaths**  
**(LSO#: 82895Q)**



# ABORTION



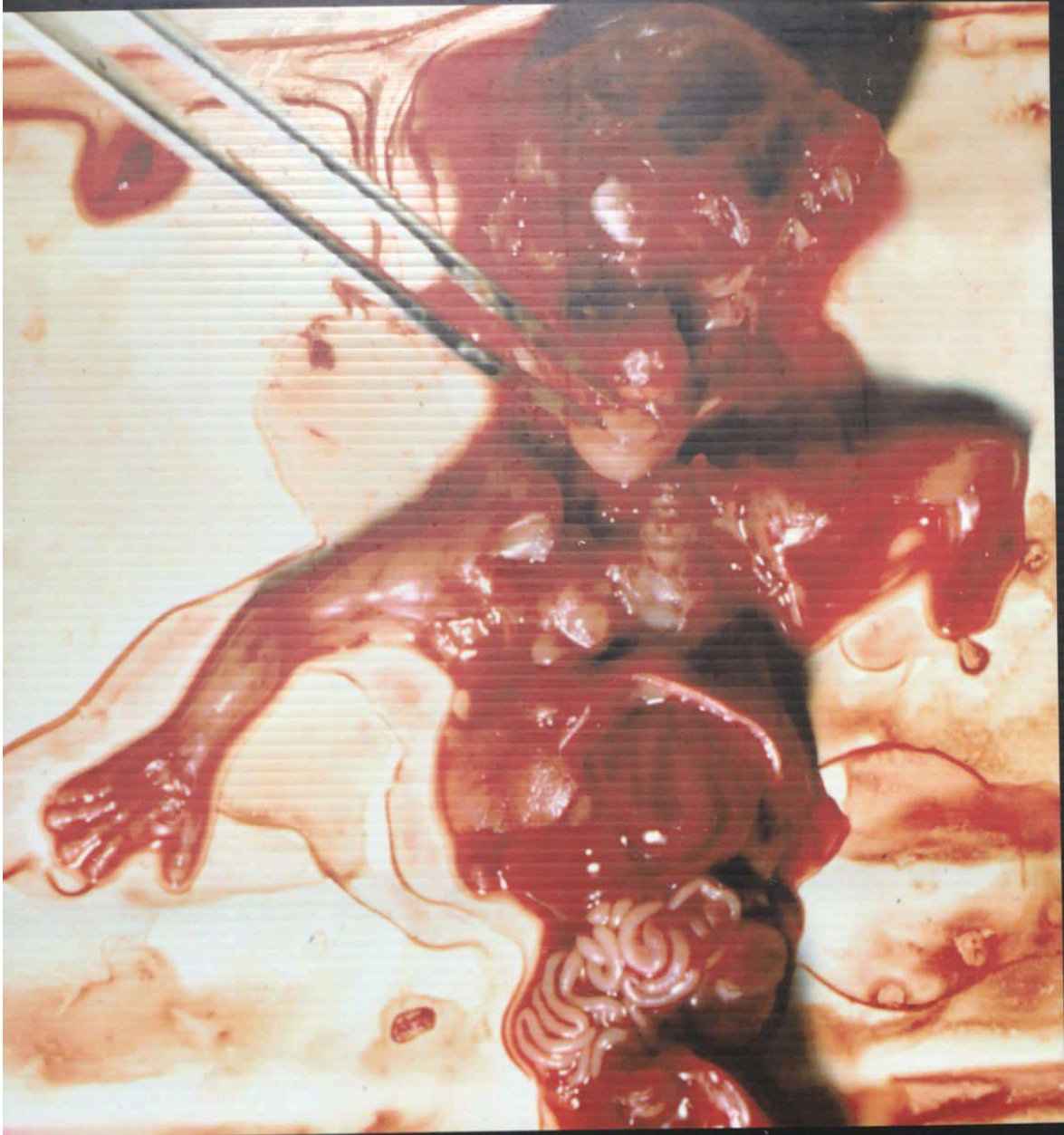
**1st-Trimester (8-week)  
Aborted Embryo**

**[whyhumanrights.ca](http://whyhumanrights.ca)**

Copyright © Center For Bio-Ethical Reform



# ABORTION



**1st-Trimester (10-week)  
Aborted Fetus**

**[whyhumanrights.ca](http://whyhumanrights.ca)**



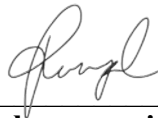
# ABORTION



**1st-Trimester (11-week)  
Aborted Fetus**

**[whyhumanrights.ca](http://whyhumanrights.ca)**

This is **Exhibit “C”** referred to  
in the Affidavit of [REDACTED]  
sworn remotely before me this 25<sup>th</sup> day of April, 2025



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**Jocelyn Rempel, a commissioner of oaths**  
**(LSO#: 82895Q)**

## **Exploring the impact of graphic anti-abortion advertisements on recipients: A preliminary scoping review summary**

### **Background**

In Canada, reports including media coverage from several provinces such as Ontario, Saskatchewan, British Columbia and Alberta highlighted that some anti-abortion rights organizations advertise graphic anti-abortion imagery containing fetuses; these images are circulated in homes through flyers and displayed near schools and on highway billboards [1–5]. These advertisements have the potential to invade the privacy of residents who do not wish to encounter these images, distress children, and upset women and gender-diverse pregnancy-capable individuals who have had a negative pregnancy experience or a spontaneous abortion [1]. Even though there have been some policy developments from local governments to regulate graphic anti-abortion advertisements, the knowledge base in this domain is severely scant. To inform policy development in Canada, we conducted a scoping review to explore the extent of available knowledge across countries on the impact of these advertisements on recipients.

### **Methods**

We designed this scoping review using the established framework from Arksey and O'Malley and the framework revision by Levac and colleagues [6,7]. Implementing a pre-determined search strategy, we identified relevant sources from Sociological Abstracts, GenderWatch, Scopus, APA PsycInfo and Web of Science. We included sources from across countries that assessed the nature, content, medium and impact of these graphic anti-abortion advertisements. We included studies from 1988 (the year of decriminalization of abortion care in Canada) to 2025.

### **Summary of preliminary findings**

Our search strategy identified 2,112 sources from these selected databases. Through the ongoing scoping review process, we synthesized findings from key sources and identified thematic categories.

#### **i) Purposively deceptive use of fetal imagery in advertisements**

Research documents that graphic anti-abortion advertisements include fetal imagery containing dismembered, blood-soaked fetuses and mounds of human tissue [8–10]. These are circulated

through advertisements in the form of large placards, flyers, websites, etc. [8–10]. These advertisements focus on depicting the fetus as a developed unborn baby to create distress among viewers and foster evidentiary trustworthiness among the public [10–12]. However, these depictions can be manipulative as analysis of these advertisements reveals that these images are dated variably to show a higher fetal development stage compared to the indicative gestational age in the advertisements to create increased discomfort [10].

## **ii) Anti-abortion advertisements are largely ineffective**

Evidence documents that advertisements containing fetal imagery are largely ineffective in changing viewers' opinions on abortion and have been received negatively by the community, leading to city-level complaints about their harmful and inaccurate nature in Ireland [13,14]. In Poland, a survey found that 82.1% of billboard viewers reported that the campaign did not change their views on abortion [14]. Furthermore, in Canada, these anti-abortion sign-carrying protestors yelled at abortion seekers accessing clinic care and caused them distress. However, abortion seekers highlighted that these protests did not impact their decision to obtain an abortion [15].

## **iii) Regulating graphic anti-abortion advertisements**

Agencies in Australia, the United States and the United Kingdom have successfully regulated some aspects of graphic anti-abortion advertisements. After receiving complaints about graphic anti-abortion fliers from Tell the Truth, an anti-abortion coalition, the Advertising Standards Bureau in Australia upheld the complaints stating that these print advertisements depicted graphic, distressing and frightening images [9]. The complainants including media reports highlighted the potential distressing impact of these images on children and women who underwent an abortion [9]. In the United States, considering the potential harm caused to children, the Federal Communications Commission noted that broadcasters had the editorial discretion to regulate the telecast of graphic anti-abortion advertisements to timings when children are less likely to view such a telecast [16]. Similarly, in the United Kingdom, the British Broadcasting Corporation won a legal battle where it refused to telecast political messages carrying graphic anti-abortion imagery [17].

**iv) Anti-abortion groups disseminating graphic advertisements are potentially linked globally.**

Research highlights that some anti-abortion organizations could be linked globally. These organizations share graphic anti-abortion resources and were accused of attempting to influence policies in other countries. For instance, an anti-abortion website in Australia was found sharing graphic anti-abortion resources from the Centre for Bioethical Reform based in the United States [9]. Furthermore, the Irish Centre for Bio-Ethical Reform's (ICBR) strategy of protesting with graphic fetal imagery outside schools and maternity hospitals was perceived negatively during the organization's attempt to support the anti-abortion movement in Ireland in 2018. The Irish anti-abortion movement organizer called for a stop to the ICBR protests and raised speculation about their Irish origin, indicating international involvement [18,19].

**Conclusion**

Research highlights that anti-abortion graphic advertisements are a pervasive international issue affecting television, print and other mediums of dissemination. Even though these advertisements are largely ineffective in changing recipients' opinions and decisions on abortion, they can cause emotional distress and potentially harm children. Agencies including regulators, broadcasters and courts have successfully regulated the dissemination of these advertisements. This evidence can inform Canadian authorities to regulate graphic anti-abortion advertisements. Moreover, observing the potential global linkage of anti-abortion groups disseminating graphic advertisements, a comprehensive approach to address this issue through provincial and federal intervention is warranted.

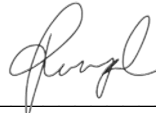
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This is **Exhibit “D”** referred to  
in the Affidavit of [REDACTED]  
sworn remotely before me this 25<sup>th</sup> day of April, 2025



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**Jocelyn Rempel, a commissioner of oaths**  
**(LSO#: 82895Q)**

## SSHRC Partnership Engage Grant

### Exploring the impact of graphic anti-abortion advertisements on communities: A multi-methods qualitative study in Canada

#### Summary of Proposal

The Supreme Court of Canada decriminalized abortion in 1988. Abortion care is common, safe, and defined as a necessary medical procedure. Nevertheless, abortion care is provided in a contested landscape where anti-abortion rights groups advertise graphic anti-abortion imagery containing fetuses. These images are circulated to homes through flyers, displayed near school premises, and mounted and on highway billboards. This imagery has the potential to distress women and gender-diverse pregnancy-capable individuals, children, and residents in their communities. Several media outlets have reported on the circulation and display of these images in various provinces including Ontario, Saskatchewan, British Columbia and Alberta. In response to these advertisements, some cities have formulated bylaws designed to prevent unwanted distribution of materials or public display of graphic images. However, the knowledge base on the impact of these graphic anti-abortion advertisements on women, gender-diverse pregnancy-capable individuals and children remains scant. The lack of research has led some local governments to withdraw or pause implementation of these ordinances due to legal challenges. These challenges question the city's authority to regulate the distribution of literature and claim a violation of Canadian Charter rights.

To address this knowledge gap we will carry out a multi-methods study that will explore the impact of graphic-anti abortion advertisements on communities. We will conduct: 1) a scoping review that examines the current state of knowledge on the impact of graphic anti-abortion advertisements on communities in Canada, 2) in-depth interviews with individuals who have encountered these images, and 3) a policy review to assess the regulation of graphic anti-abortion advertisements at different levels of government.

Leveraging our existing partnership supported by previous SSHRC grants, we will undertake this study in collaboration with the Abortion Rights Coalition of Canada (ARCC) and our research group at the University of Ottawa (uOttawa). ARCC is the only nationwide political pro-choice organization working towards furthering abortion rights and access in Canada. Dr. Angel M. Foster, Professor at the Faculty of Health Sciences at uOttawa, will lead this project in close coordination with Ms. Joyce Arthur, Executive Director, ARCC. Dr. Foster's experience in conducting policy-directed abortion care research and Ms. Arthur's experience in driving knowledge mobilization initiatives will strengthen this project. Dr. Foster is a globally recognized abortion care researcher with projects in 22 countries, including Canada, the United States, India, and Libya. Ms. Arthur is a pioneering abortion rights advocate who has worked with various decision-makers to drive policy change to improve abortion access in Canada.

The findings from this project have the potential to be directly assimilated into policy deliberations at the municipal and provincial levels. These findings will directly contribute towards evidence generation for the city of St Catharines, Ontario and the Niagara region for developing robust and comprehensive bylaws regulating graphic anti-abortion advertisements. At the provincial level, these findings can inform deliberations of Bill 80 in the Legislative Assembly of Ontario, which aims to regulate graphic images of fetuses sent through the mail. Furthermore, we will publish our results in peer-reviewed journals and share our findings at conferences to ensure reaching a diverse multi-disciplinary audience, including researchers, public policymakers, and reproductive health rights, and justice advocates.

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### Goals & Description

#### Background

The Supreme Court of Canada decriminalized abortion in 1988, and since then, there have been no federal laws that restrict abortion care in the country [1,2]. Canada is part of a small group of countries where the provision of abortion care is decriminalized with no regulations on gestational limits [3]. Furthermore, the federal government designated abortion care as a medically necessary service thus requiring provinces and territories to cover this care under their health care insurance programs [3,4]. Abortion care in Canada is both common and safe [3,5].

Some anti-abortion rights organizations in Canada advertise graphic anti-abortion imagery containing fetuses and these images are circulated to homes through flyers and displayed near schools and on highway billboards [6]. Several media reports have documented incidences of graphic imagery circulation and display in both local communities and across provinces including in Ontario, Saskatchewan, British Columbia, and Alberta [7–10]. These advertisements have the potential to invade the privacy of residents who do not wish to encounter these images, distress children in their homes and near school premises, and upset women and gender-diverse pregnancy-capable individuals who had a negative pregnancy experience, a spontaneous abortion, or an induced abortion [6].

In response to these advertisements, a number of local governments have formulated and implemented a patchwork of measures, including bylaws requiring enclosed packaging and viewer discretion labels on the advertised graphic content and prohibiting signage outside schools [6]. As of August 2024, nine cities required graphic flyers to be concealed in envelopes with content information mentioned on them [11]. Calgary is the only city that regulates graphic signage outside school premises [6].

Even though there have been some policy developments regulating graphic anti-abortion imagery, the knowledge base on their impact on residents, women and pregnancy-capable individuals, and children specifically, is scant. The lack of research has led to local governments withdrawing or holding off passing bylaws due to concerns regarding litigation challenging them in courts. The city of St. Catharines, Ontario, repealed their bylaw requiring warning labels due to a legal challenge stating that the city has no authority to regulate the distribution of literature and that the bylaw violated rights under the Canadian Charter [12]. The city aims to bring another better-equipped bylaw that could withstand legal challenges [12].

Observing the litigation against St. Catharines' bylaw, Niagara Region adopted a wait-and-see approach before implementing its own [13]. As of this writing, St Catharines authorities were gathering evidence on the impact of these graphic images on residents to formulate the revised bylaw [12]. Therefore, with a focus on informing policy, there is a need to explore the overarching landscape and any research on residents' experiences encountering unwanted graphic anti-abortion content.

In the previously awarded SSHRC Partnership Engage Grant, we explored abortion seekers' experiences of encountering anti-abortion protesters near clinics in Canada [2]. This research highlighted that abortion seekers found these anti-abortion protests upsetting and stigmatizing [2]. Our project aims to explore evidence on the existing knowledge on the impact of graphic anti-abortion advertisements on individuals, residents, and specific subsets of residents' experiences encountering them, and policy mechanisms to limit the distribution and display of these images.

## Objectives and goals

This mixed-methods study aims to explore the impact of graphic anti-abortion advertisements on individuals encountering them. Specifically, we aim to:

1. Examine the current state of knowledge on the impact of unsolicited anti-abortion advertisements, including those with graphic imagery on the recipients
2. Explore the experiences of individuals who have encountered these graphic anti-abortion images in their communities
3. Examine existing policies regulating graphic anti-abortion advertisements
4. Develop a knowledge mobilization and translation plan for key stakeholders to inform research and advocacy.

## Partnership

We will undertake this study through a partnership between the University of Ottawa (uOttawa) and the Abortion Rights Coalition of Canada (ARCC). ARCC is the only nationwide political pro-choice organization working towards furthering abortion rights and access in Canada [14]. ARCC undertakes political advocacy and educational initiatives with a primary focus on safeguarding and furthering abortion access in Canada [15]. ARCC works with a diverse team of pro-choice groups and individuals to develop collaborations and disseminate knowledge [15]. Through continued collaboration with ARCC, our team has generated strategically placed knowledge products through various successful Partnership Engage Grants. This includes a published scoping review on belief-based denial of abortion and contraceptive care in Canada [16]. With regard to this study, ARCC developed position papers exploring the impact of graphic anti-abortion advertisements in Canadian cities. However, the lack of rigorous peer-reviewed knowledge in this domain has stifled advocacy efforts. This study is specifically designed to meet the research needs of our community partner. ARCC will be involved in all phases of this project including the study design, data collection, and interpretation of findings through a validation workshop with the ARCC Reproductive Justice Advisory Board. With the support of this research, ARCC will lead the knowledge mobilization and translation plan.

## Theoretical framework

Practical action research serves as the theoretical foundation for this project [17,18]. The practical concern that we are addressing has been defined in consultation with our partner organization ARCC, and community members in Canada. Our project is designed to empower participants, acquire knowledge, affect social and policy change, and advance social justice [19]. As is characteristic of action research [18], our design embraces the planning, acting, observing, and reflecting cycle, which will be ongoing throughout the life of the project. We believe that the knowledge generated through this project will have value beyond the local contexts, and thus, we have prioritized disseminating our results and lessons learned to multi-disciplinary audiences in Canada and beyond.

## Methods

We will undertake a multi-methods study that includes: 1) A scoping review to assess the current state of knowledge on the impact of anti-abortion advertisements, including those containing graphic imagery, on recipients, 2) In-depth interviews with individuals who have encountered these graphic anti-abortion images in their communities in St Catharines, Ontario, 3) A policy review to assess the regulation of graphic anti-abortion advertisements at the local, provincial, and federal level.

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Component 1: A scoping review: We will undertake a scoping review to obtain insights on the extent of knowledge available on the impact of anti-abortion advertisements including those containing graphic imagery on communities in Canada. A scoping review provides a comprehensive overview of the available evidence on a topic, especially ones that have received little scholarly attention. We will undertake this iterative review adhering to established frameworks [20,21]. This process involves six steps: 1) identifying the research question, 2) determining relevant studies, 3) selecting studies based on defined inclusion criteria, 4) data charting, 5) collating, summarizing and reporting findings, and 6) expert consultation. We will undertake a review of peer-reviewed publications and grey literature including reports from stakeholder organizations such as nonprofits and government agencies. As the displays of graphic anti-abortion images in public areas have been widely reported in media sources in Canada, we will incorporate a media audit component in this scoping review. To obtain a head start, we have developed a scoping review protocol and have worked with uOttawa librarians to identify the appropriate peer-reviewed and media databases that include sources in English and French. We are well placed to launch this study component immediately upon receipt of this grant. We will use Covidence<sup>®</sup> to manage the source material data and the Preferred Reporting Items for Systematic Reviews and Meta-Analyses extension for scoping reviews (PRISMA-ScR) to guide reporting [22]. For the consultation phase, we will engage with sexual and reproductive health researchers, and legal experts to fill any knowledge gaps and validate our findings. Based on insights obtained from our previously developed scoping reviews, we will interview 15-20 experts during the consultation phase [3,16,23]. We will identify experts leveraging ARCC's established networks and from published sources identified from the early stages of this scoping review. These expert engagements will also provide a platform for the dissemination of the findings from this review and will directly contribute to ARCC's knowledge dissemination plan and further knowledge mobilization.

Component 2: In-depth interviews with individuals who encountered graphic anti-abortion advertisements: We will undertake in-depth interviews with individuals who have encountered graphic anti-abortion advertisements in the past 10 years (on/after January 1, 2015). Noting the topical nature of this issue and the potential contribution of this research towards policy development in the city, we will focus on St Catharines, Ontario, as the study site for this project component. We will adopt a multi-modal community-based recruitment strategy that includes working with community organizations to spread the word, developing a study website, sending listserv announcements, and advertising to ARCC's network organizations and posting advertisements on social media. We will incorporate gendered and gender-neutral language in English and French in the recruitment material. Furthermore, we will use racially and ethnically inclusive images on my recruitment flyers. Adopting these strategies will ensure that our recruitment includes a diverse group of participants especially those who encounter structural oppression based on their age, race, ethnicity, language, gender and sexuality.

We will conduct the interviews in English and French over the phone/Zoom; we expect the interviews to last around 60 minutes. After undertaking a study eligibility screening, we will review the consent form with the participants, respond to their questions, and obtain their oral consent if the participant agrees. We will offer a CAD40 gift card to the participants for their contribution. We will follow a semi-structured guide containing open-ended questions about the participant's demographic characteristics (including their preferred pronouns and gender identity) and their background. Then, we will proceed with a series of questions regarding the participants' experience of encountering the graphic anti-abortion advertisement in their communities including their perspectives and reflections. We will end the interviews by asking their opinions on improving the regulation of graphic anti-abortion advertisements. We will use thematic saturation as our endpoint and conduct 3-5 additional interviews for confirmation [24]. Drawing from our experience of undertaking qualitative research in Canada [1,25–29] and the existing methods literature [24,30,31], we estimate that we will interview 20-30 individuals to reach thematic saturation and make claims about the transferability of the results. We will

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audio-record and transcribe all interviews and memos after each interaction to reflect on participant-interviewer dynamics, establish thematic saturation, and initiate the analytic process [32]. We will use ATLAS.ti® to manage our data and will draw upon interview transcripts and analytic memos to undertake content and thematic analysis [32–34]. We will use both pre-determined categories and codes based on the research questions and inductive techniques to identify emergent ideas. Our content and thematic analysis plan is centered on grouping categories of information, drawing connections between ideas, and understanding relationships; regular team meetings will guide our interpretation.

*Component 3: A policy review of the regulation of graphic anti-abortion advertisements in Canada:* We will undertake a policy review on the regulation of graphic anti-abortion advertisements in Canada. We will conduct a review of bylaws, laws, bills, policies and guidelines and other relevant policy instruments regulating graphic anti-abortion advertisements. The media audit component of the scoping review (component 1) will support the identification of relevant policy instruments. We have designed the media audit to screen relevant local media sources and highlight relevant policies designed or enforced, especially those at the municipal level. We will also screen legal databases to identify legislation and case law that have shaped this policy discourse. We will also review citizen complaints or other avenues by which residents have weighed in on policy formulation. We will explore the policy questions addressed through the policy instrument, the scope, enforcement tools, impacts, evaluation and accountability mechanisms. We will design and conduct this review in adherence to established frameworks [35–37]. As a culminating step, we will organize a consultation workshop with the ARCC team, where we will share and validate our findings and fill any knowledge gaps.

*Points of analytic interface:* There are multiple points of analytic interface in this multi-methods study. Our scoping review will help us contextualize the issue of graphic anti-abortion advertisements in Canada and inform the development of the in-depth interview guide for individuals who have encountered them including a priori codes. The scoping review and in-depth participant interview will inform and strengthen the policy review. The scoping review especially the media audit component, will facilitate the identification of relevant local policies regulating these advertisements and the in-depth participant interviews will highlight the impact of these policies on communities. Expert consultations will help us fill gaps in knowledge and allow us to validate our findings. Although we will analyze each component separately, the final phase in our analytic plan involves formal integration and triangulation [33].

*Research ethics:* The Research Ethics Board at uOttawa has approved all components of this project. Thus, we will begin this study immediately upon receipt of the grant.

### Timeline

Our proposed project will take place over a one-year period from March 1, 2025 through February 28, 2026. We outline the major milestones in the table below:

Activity	M	A	M	J	J	A	S	O	N	D	J	F
Conduct scoping review												
Consult experts for scoping review												
Develop in-depth interview study instrument												
Recruit interview participants												
Conduct in-depth interviews												
Analyze interview data												
Conduct policy review												

[illegible]

## Knowledge mobilization and translation plan

This study is the first comprehensive exploration of the impact of graphic anti-abortion advertisements on communities in Canada. The findings from this study will provide ARCC with pertinent policy insights and shape its advocacy strategy and education initiatives. The involvement of the ARCC team in all phases of this study will ensure that the findings of the study are organically integrated into the knowledge mobilization plan. The ARCC director will lead the effort to integrate the findings from generated knowledge products into the organization's core activities and engage their partner organization network in the knowledge mobilization initiative. As the regulation of graphic anti-abortion advertisements is in a budding policy space, the results from this study will generate keen interest among diverse stakeholders in Canada and beyond. Our proposed collaboration includes an array of knowledge mobilization and translation activities such as stakeholder meetings and a policy consultation and dissemination workshop. Our intended knowledge output includes a complement of presentations, reports, peer-reviewed open-access journal articles, policy briefs and strategic media pieces. These knowledge products will ensure our engagement with diverse audiences. We will develop our knowledge products such as reports, policy briefs and media articles to expand our reach to Anglophone and Francophone decision-makers, advocates and communities.

## Team composition

Principal Applicant: [REDACTED], DPhil, MD, AM Dr. [REDACTED] is a Professor in the Faculty of Health Sciences and the 2011-2016 Endowed Chair in Women's Health Research at the University of Ottawa. She holds a doctorate from the University of Oxford in Middle Eastern Studies with disciplinary training in medical anthropology and public health, an MD from Harvard Medical School, and both master's and bachelor's degrees from Stanford University. Her research focuses on emergency contraception, abortion, and health professions education, and she currently leads projects in 22 countries. She has authored more than 100 publications and co-edited three books; her next book is dedicated to the global journey of mifepristone and will be released in early 2025. In 2017, the Guttmacher Institute bestowed on her the Darroch Award for Excellence in Sexual and Reproductive Health Research and in 2018, she received the inaugural CanWaCH Leadership Award. Dr. [REDACTED] will oversee all components of the project and will be responsible for all reporting requirements.

Partner Organization: [REDACTED] is the founder and Executive Director of the Abortion Rights Coalition of Canada. Her key work for ARCC includes lobbying various levels of government, leading activist campaigns, writing articles, and disseminating information to supporters and the public. Previously, Ms. [REDACTED] ran the Pro-Choice Action Network in British Columbia for 10 years and was editor of the national newsletter *Pro-Choice Press*. Ms. Arthur has written hundreds of articles on abortion and other political and social justice issues, spoken at dozens of venues in Canada and internationally, given hundreds of media interviews, written several book chapters, and appeared in about 10 documentaries. Ms. [REDACTED] will lead the operationalization of the knowledge mobilization and translation plan.

Study Coordinator: [REDACTED], *PhD(c), MSc*, is an advanced doctoral candidate in the population health program at uOttawa. [REDACTED] is a global abortion researcher who has worked on various studies in Canada, the United States, and India. [REDACTED]'s research focuses on developing systems that are responsive to the needs of individuals seeking abortion and contraception care. [REDACTED] is also a research fellow with Cambridge Reproductive Health Consultants in the US, where he provides



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research and operational support to The Massachusetts Medication Abortion Access Project. In the US, his research focuses on expanding access to medication abortion in the wake of bans and restrictions. In Canada, he worked with Planned Parenthood Ottawa as a grant researcher, where he analyzed funding opportunities and developed grant proposals. This project will provide him with a training and capacity-building opportunity. He will lead the coordination of research activities including outreach, participant recruitment and dissemination of findings.

*Undergraduate and graduate research assistants (uOttawa)* Capacity building and mentorship for students are embedded in this proposed project. Dr. [REDACTED] will mentor both graduate and undergraduate research assistants to assist in recruiting participants, designing the interview guide, coordinating interview schedules, transcribing interviews, contributing to thematic analysis, writing and scientific communication of results. They will also assist with developing the scoping review protocol, screening of sources, extraction of data and knowledge synthesis.

*Training plan:* By providing intensive mentorship and an opportunity to engage in all aspects of the research project, students involved with this project will gain expertise in multi-methods research. We will also provide students with access to subject-specific, methodological, and skill-building workshops thereby supporting the next generation of social science and health science researchers.

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## Expected outcomes summary

This project will explore the impact of graphic anti-abortion advertisements on communities in Canada, especially residents who encounter such imagery in their mail and children near school premises. This information will support Abortion Rights Coalition of Canada's (ARCC) ongoing effort to formulate and implement education initiatives, advocacy strategies and a public policy agenda. Our academic-non-governmental organization partnership responds directly to the needs identified by ARCC and its members.

As of writing this proposal, no peer-reviewed research examines the experiences of individuals who have encountered graphic anti-abortion advertisements in Canada. We will document and analyze these experiences of individuals, review media reports, policies and peer-reviewed literature to contextualize our understanding and consult domain experts to address knowledge gaps. Through these processes, we aim to support a policy agenda aimed at better regulating anti-abortion advertisements in Canada.

The findings from this project will provide evidence to guide policy discussions in the municipal and provincial jurisdictions. As a direct contribution towards policy development, this research will support ARCC's advocacy and evidence-building efforts for the city of St Catharines, Ontario, to formulate and implement a more robust bylaw regulating graphic anti-abortion advertisements sent to homes. ARCC works closely with the city's legal office and the knowledge generated through this project has the potential to be assimilated into topical policy discussions in the city and beyond. In terms of the impact of this research at the provincial level, as of writing this piece, the Legislative Assembly of Ontario is deliberating on Bill 80, Viewer Discretion Act (Images of Fetuses), 2023, which primarily requires opaque concealment and content description of mail containing graphic images of aborted fetuses. Indeed, this research demonstrates the potential to lead a policy discourse that is transferrable and adaptable at various relevant levels of government and jurisdictions, including other cities such as Oakville, Ontario and the Niagara Region that are considering these regulations.

Furthermore, our collaboration includes a range of knowledge mobilization and translation activities that begins with proactively sharing our findings with a diverse group of stakeholders; these include ARCC network members, reproductive health advocates and policy researchers. After completing the multi-methods study, we will release a bi-lingual (English-French) report for key stakeholders. We also believe these findings will be of interest to broader advocacy and academic audiences. Thus, we intend to present the results of the study at local, national, and international conferences and submit at least two manuscripts to peer-reviewed journals.

In addition, this collaboration will create student training opportunities at both the graduate and undergraduate levels. Dr. [REDACTED] is an established mentor who has consistently prioritized training and mentoring the next generation of social science reproductive health researchers. This project represents an opportunity to introduce students to academic-community organization partnerships, rigorous research methods, and meaningful knowledge mobilization activities. Finally, we believe that this opportunity will contribute to a growing and sustained partnership between Dr. [REDACTED]'s team and Ms. Arthur's team. Through this study partnership, we will launch a national-level study supported by a larger tri-council grant exploring the impacts of graphic anti-abortion advertisements. Successful completion of this project will allow us to identify additional research priorities and position us to obtain support to undertake future projects focused on comprehensive sexual and reproductive health policy and service delivery in Canada.

This is **Exhibit “E”** referred to  
in the Affidavit of [REDACTED]  
sworn remotely before me this 25<sup>th</sup> day of April, 2025



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**Jocelyn Rempel, a commissioner of oaths**  
**(LSO#: 82895Q)**

### **Sampling of Public Complaints**

**Hamilton, ON:** Earlier that fall I had an abortion it was a hard decision for me to make and weighed on me and approx. a week later I see these two young girls, they didn't look more than 18, walking from house to house putting something in everyone's mailbox. I went out to check it out after they had left the street and found the very graphic pro-life pamphlet they had dropped into my mailbox. Making the decision to have an abortion doesn't always come easy and to be confronted with this horrible imagery put me right back to the day and I broke down right on my front porch.

**Toronto, ON:** I was in bed when I saw someone walk up to our door and leave something. When I got up, I found the flyer in the shoved between the doors. I had had a miscarriage at home the night before - I had been more than 11 weeks pregnant. The fetuses body, my little one, was still in the bathroom as it hadn't even been 6 hours since it happened. I was devastated. For them to use this kind of image spreading false information rocked me. I sat in my diaper (the bleeding from my miscarriage still happening) and called my MP and MPP in tears about how this was possible and still happening. Never heard back from my MPP but my MP's office called to say that since it wasn't Canada post, there was nothing to be done. I texted the mothers in my community group chat to warn them about the false info and images circulating but it didn't seem like enough.

**London, ON:** There was a group of people showing off the graphic signs and putting flyers in the mailboxes of people's homes. I lived about a 20-minute walk away from campus at the time and they put pictures of aborted fetuses and chopped up fetus pieces through the mail slot on my door. I was absolutely disgusted and infuriated that they would be putting these pictures into the mailboxes of people's homes. I lived in a house with students but there were lots of kids in the area I was living in. That's traumatic for a kid to see.

**Hamilton, ON:** My six year old found the flyer. I have had many friends and family members who have have miscarriages and have pregnancies end that they very much wanted. What a horrible traumatic thing for them to see. I have also had friends and family members choose to terminate pregnancies for a variety of complicated reasons. How dare someone trigger people with that kind of thing in mailboxes?!

**New Westminster, BC:** Recorded the person delivering it into our mail slot. They are not a registered mail carrier so have no right to enter my property. My teenage daughter found it. It was

emotionally traumatizing to my teenage daughter. She already has emotional and mental health related challenges. When I saw it I was also deeply disturbed and angered by their shallow and callous means of communication, and the overtly misleading and misinformed propaganda. If these were adult bodies, it would not be allowed to be distributed like that. How hypocritical of them.

**Edmonton, AB:** I am currently 14 weeks pregnant as a high risk pregnancy. While I myself would not choose to have an abortion I strongly believe in the woman's right to choose. Upon finding this brochure on my door step I was physically sick to my stomach from the horrific disturbing images. Emotionally I was sick and sobbed for awhile. The images were close in age to my baby which I could lose being high risk. This was disturbing and unnecessary. I'm thankful my children did not see the flyer. I was physically and emotionally sick over it.

**Calgary, AB:** Shock, horror, confusion, disgust. They have a truck that goes into rush hour that I've been stuck behind. Logically I know it's not what they say it is. Emotionally I'm staring at gore and I want to be ill. They stand on corners of busy intersections and scream and wave signs with disturbing images. I've come home to pamphlets in the door that I've removed before my roommates small child could see them.

The fact that it's 20 years later and they're still allowed to do this disgusts me. The fact that they think it's some moral cause when all it is is to produce emotions of shock and horror to emotionally blackmail people into their ideology is a smudge on the idea of freedom of expression. I'd stand up for them for signs with messages on their opinions. But misinformation and photographs that cause people to be sick, faint, or hopeless? Never.

**Ottawa, ON:** They were pamphlets left in our mailbox on the intersection of Blackburn and Somerset there is a daycare on our street. It was just shocking to come home to a pamphlet which such horrible imagery. I brought it in to our apartment to show my roommate out of shock I could not look at them too long. I then thought about how many kids live and play on our streets and how when I was a young girl that would have been so scary to see. This happened during the big pro life event in Ottawa last summer. I did not see who left the pamphlets.

It was just disgust and worry, I actually went down our street and picked up a couple that were on the side of the road so no kids would see them when they came outside to play. I think it is entirely inappropriate to hand these types of pamphlets out especially in neighborhoods with lots of children. Again these images were so gross to me I had to fold the pamphlet as I threw it away, imagine a child found the ones I had picked up off the street!? Or even a woman who has past

trauma with regards to abortion or pregnancy loss. It is a complete lack of respect for community and is entirely inappropriate.

**Mississauga, ON:** I found the flyer wedged in my door when I arrived home from spending the day with my best friend at her chemo treatment. At first I was in disbelief, that someone, anyone could create such graphic images and leave this wedged in my door, for anyone to see, including children. While I don't have children there are many in my neighbourhood and I can't imagine the damaging effect these images would have. Since I had an abortion early in my life, this triggered many emotions and brought back the trauma of going through that. I 100% believe in the right to choose and I don't regret my decision but seeing these images brought on many emotions, including guilt, which is their purpose I suppose. I called the number on the flyer and left a message on their system advising that I would be calling my local MPP to have this stopped, I asked them why they would use such tactics without any thought for who would receive this flyer (children).

**Barrie, ON:** 2 young girls were going around the neighbourhood placing anti abortion flyers on doors — not knocking just leaving the graphic infographics. These fliers were being distributed right as elementary students were walking home from school meaning that young kids would see these graphic, misleading pamphlets when they arrived home from school.

**Fredericton, NB:** I was about 11 years old when I grabbed the mail out of the mail box on my way home from school. There was a graphic post card with late term aborted fetuses on it and it was very distressing for me to experience. I didn't understand what to make of it and nobody ultimately brought it up again. I was very young and didn't understand what abortion was. It didn't make me feel any way about abortion (again, I didn't even know what it was). The only thing it did was expose me to disturbing images which stuck with me for a very long time.

**Toronto, ON:** Last week I discovered a disgusting, inflammatory, hate-filled flyer in my door (tucked in to the door, not the mailbox). I did not see the delivery person. I read the flyer. I felt extremely angry. The language and the imagery used stated with absolute clarity that any woman who had an abortion had "murdered her pre-born child". This is false. I became angry and disgusted, having fought for women's reproductive rights in the 80's -- attending the Morgenthaler trial, rallies, letter campaigns etc -- a woman who exercises control over her body is not a murderer. Period. I phoned the number on the flyer. Listened to a long, immensely irritating outgoing message from a man (of course) with a soft, soothing voice, going on about the pre-born. When the message was finally over I left a voicemail telling them to stop distributing this hate, gave them my address, and told them I would sue for trespass if they came by again. I told them to respect



Canadian women and to stop perpetrating violence against women by calling women who have abortions murderers. I then contacted my City Councillor, my MP, the police. I consider the pamphlets a hate crime, although I am aware they do not meet the legal definition of hate.

**Oakville, ON:** I found the flyer tucked into my door handle (our mailbox is down the street). I immediately knew what it was and that I felt violated and needed to do something about it. I looked for contact information (thereby seeing more images) and ended up calling the number and leaving a voicemail. I then found your action document and ended up contacting my city councilor via email to request action be taken against the public distribution of graphic images.

First, I was thankful I found the flyer and not the child living in one of the other units. I had been deeply traumatized as a child by an anti-abortion rally with graphic signs and have no desire for anyone else to experience that. I felt violated that those images had been forced on me in my own home, which is supposed to be a safe place. I also am deeply bothered by the flawed reasoning on the flyer. It said, "You cannot believe in both human rights and abortion." I believe in human rights, including the right to have an abortion. I don't love it, and would rather support pregnant women in other ways, but I do not believe it is so black and white. It's a complicated issue, and many people have complicated feelings and/or experiences with it. By showing these graphic images, it can traumatize, shame, and alienate people. I see no good that can come out of it, only bad. It has certainly put me in a state of agitation, which will take time for me to recover from.

**Mississauga, ON:** I pulled up to my driveway. I saw a flyer sticking half out in the mail box. I saw a picture of a small baby that I recognized from other pro life ads. I was not impacted graphically but [one of] my kids could have grabbed it. Which I find very cowardly, disrespectful inappropriate and not at all tolerable. I am very much a pro choice like my wife. I believe the pro life movement as corrupted the issue. I wouldn't say I'm pro abortion I'm pro choice. Which say pro abortion sounds like I believe in killing a prospective human. I strongly believe it is women's choice to have a termination. But as a man I also feel strongly that if a women gets pregnant and the male in the situation says have a abortion, she chooses to keep it. Well than he should not be held responsible. I know it is a controversial opinion but it is mine.

**New Westminster, BC:** I was home alone when a man walked up to the front door and rang the doorbell, I waited a second and when I came out he was already running halfway down the street. I saw a pamphlet on the floor, and realizing that it was covered with photos of ultrasounds and embryos, I got mad and stormed back inside. I went to tell my older sister, but unfortunately since I am only 15, I did not think that there would be anything worse inside the pamphlet. As soon as I opened it, there was an extremely graphic photo of what looked like a dismembered infant. I immediately dropped it to the floor in shock, and proceeded to call my parents. P.S. there was

another person, looked to be a young girl, maybe mid-teens, dropping off the same flyer at houses across the street.

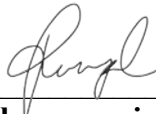
My family and I were all horrified, unfortunately my mom had to open the same pamphlet in order to make a report to the city. Since I have multiple long-term mental illnesses, graphic images like these can affect me greatly, or I guess more than it would other people. It was effectively traumatizing. Currently I nanny for a newborn infant, and it was horrifying to see something that looked so close to her cut up in an image. There are many young children who live on my street, including that infant that I Nanny, and so I went to their homes to warn their parents so that none of the children would pick it up by mistake. I shudder to think what could have happened if they did. Later when I went all the way to victory Heights to feed my friend's cat, I found the same pamphlet on their doorstep, and many on the stoops of other people's houses.

**Hamilton, ON:** Found in my mailbox. My wife and I had four miscarriages with first one reaching 15 weeks gestation. It happened at home and my wife and I dealt with our fetus ourselves. It looked exactly like the 15 week picture in the flyer and brought back the trauma of that day. I am happy it was me that checked the mail today as it would have had a far more severe impact on my wife.

**New Westminster, BC:** A man and woman were seen (on camera) delivering graphic (images of aborted fetuses) anti-choice flyers to my front door. This was deeply upsetting to my entire family. These images are graphic and abhorrent, and neither I nor my children and husband consented to view these images. Once the mail was collected, there was no way to avoid seeing these images, and they profoundly disturbed all of us.

**Toronto, ON:** Flyer was placed in mailbox around 12:10 pm (during lunch). I heard it being placed into the mailbox but didn't see who put it there. It is from [healingandhelp.ca](http://healingandhelp.ca) and also has the address [whyhumanrights.ca](http://whyhumanrights.ca) and the number 289-805-8298 on it. It's offensive to me as a woman (and also as a non-Christian) that these hateful views full of medically inaccurate garbage are being spread around. On the back it specifically says that abortion is wrong even in the case of sexual assault or if a mother's life is in danger. It's hate speech against women; it is advocating that women do not have a right to bodily autonomy.

This is **Exhibit “F”** referred to  
in the Affidavit of [REDACTED]  
sworn remotely before me this 25<sup>th</sup> day of April, 2025



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**Jocelyn Rempel, a commissioner of oaths**  
**(LSO#: 82895Q)**

Court File No.: CV-24-00094951-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

**CAMPAIGN LIFE COALITION and MAEVE ROCHE**

Applicants

and

**PARLIAMENTARY PROTECTIVE SERVICE**

Respondent

APPLICATION UNDER section 11 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43 and rules 14.05(3)(h) and 38 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194.

**AFFIDAVIT OF [REDACTED] AFFIRMED JANUARY 17,  
2025**

I, [REDACTED], of the [REDACTED],  
MAKE OATH AND SAY:

1. I hold a PhD in Public Administration and Management with a concentration on Public Policy Analysis and Public Health Policy. I have knowledge of the matters herein deposed, except where such knowledge is based on information and belief, in which case I have specified the source of such information and belief and verily believe the same to be true.

2. I have been asked to provide an expert opinion answering the questions relevant to this court proceeding that are set out below. My signed Acknowledgment of Expert's Duty is attached to this affidavit as **Exhibit "A"**.

3. I am the sole proprietor of a research consulting agency named Provida: Public Sector Solutions, which specializes in providing services to non-profit organizations and government agencies. I have been working as an independent consultant to various degrees since 2008. I have been consulted by think tanks, advocacy organizations, governments, and non-governmental

organizations on policy development and policy analysis. My primary skill is program evaluation. Program evaluation is the measurement of the impact of social service initiatives. I have established model programs that are evidence-based and replicable for successful implementation by social service agencies.

4. Previously, I was an Assistant Professor in the Master of Public Administration Program at Tarleton State University from 2017 to 2021. My scientific research has been published in scholarly peer-reviewed journals and presented at conferences around the world. My CV is attached to this affidavit as **Exhibit “B”**.

5. I have previously qualified as an expert and provided opinion evidence in three legal proceedings: 1) *June Medical Services Et Al v. Caldwell et al*, (Case No. 3:14cv525 (2014)); 2) *Planned Parenthood of Greater Texas. Et Al v. Abbott et al*, (Case No. 1:2013cv00862 (2013)); and *Planned Parenthood Southeast, Inc. et al v. Strange et al*, (Case No. 2:2013cv00405 (2013)).

### **Facts and Assumptions**

6. I have been provided with and have reviewed the Notice of Application in this matter and the Affidavits of [REDACTED]. In preparing my opinion, I have assumed that their evidence with respect to their interactions with the Parliamentary Protective Service is accurate.

### **Opinion**

7. I have been asked by counsel for the applicants, Campaign Life Coalition and Maeve Roche, to provide an opinion on 1) what findings from a report I authored titled “A Statistical Analysis on the Effectiveness of Abortion victim Photography in Pro-Life Activism” may be applied to this matter, and 2) my opinion on the persuasive value of the abortion victim photography which is the subject of this matter.

8. Having reviewed this material and revisited my research on this topic, I conclude that abortion victim images (the “**Signs**”) are both effective and necessary for persuasive advocacy in public demonstrations. The assertions made by [REDACTED], which are based on my research, accurately summarize my work, which is cited as Exhibit B in the Affidavit of [REDACTED] (at para. 10).

9. I can personally testify to the impact of these very images CLC attempted to display because I performed a thorough evaluation (the “**Study**” attached to this affidavit as **Exhibit “C”**) of how these same images affected respondents’ feelings and support for abortion. I conducted my analysis in 2016 following a large-scale campaign that delivered postcards with these photos (the “**Campaign**”) to thousands of homes in Ontario by activists at the Canadian Centre for Bioethical Reform (“**CCBR**”) a few months earlier in the summer of 2015.

10. I was commissioned by CCBR to analyze a large sample of data collected by a research firm hired to survey hundreds of households in the targeted postal codes prior to the postcard campaign and then again after the postcards were delivered. The sample totaled n=1741, consisting of n=845 in June and n=896 in September. These were not matched pairs, but households chosen randomly (to prevent selection bias), before and after the postcard campaign. The aim was to assess the scope of their work (who and how many citizens were actually reached by CCBR’s campaign) and assess public opinion in general before exposure to these images, and then afterward to see what impact the photos had on those CCBR reached with their message.

11. I did not design the surveys or the sampling methodology because I was hired after the fact in order to independently analyze the raw data as objectively as possible. I was tasked to determine if (and to what degree) seeing abortion victims affected respondents’ perceptions (positive or negative) about abortion. I was also tasked with assessing how much (if any) difference this made

in their political views on abortion legality in either direction, toward more restrictions/protectations for unborn human life or against these aims.

12. The sample was sufficiently large for generalizability to the entire Canadian population and combined with random selection to control for selection bias and other threats to internal validity, those surveyed likely reflect the overall views of Canadians within a 5-point margin of error and with 99% confidence that the true population is represented by the sample. The baseline data (before the images were delivered) verifies that the sample corresponded to established data from other national-level public opinion surveys on abortion. Indeed, the initial survey in June mirrored other polls such as one from 2012 commissioned by Post Media News and Global TV<sup>1</sup> which determined how many Canadians consider themselves pro-life vs. pro-choice and how strongly they support or oppose abortion. This poll, conducted by Ipsos Reid<sup>2</sup> corresponded to the baseline data (before the images were delivered), which increases the confidence that the 2015 sample was representative of general public opinion on this issue.<sup>3</sup>

13. By reflecting public views on abortion before the campaign as substantiated by other researchers, this data further supports the conclusion from the data that the abortion victim images were instrumental in changing the viewers' feelings negatively regarding abortion and legality.

14. I reported percentages to best communicate with my non-academic audience. However, percentages can be misleading because increases and decreases can fall within the realm of chance. Accordingly, the data was first tested to confirm correlation to ensure that these gains were

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<sup>1</sup> "New poll shows most Canadians support abortion — with some restrictions" *National Post* <https://nationalpost.com/news/canada/new-poll-shows-most-canadians-support-abortion-with-some-restrictions>

<sup>2</sup> "Canadians assess key social-values questions facing the country" *Ipsos Reid* <https://www.ipsos.com/en-ca/canadians-assess-key-social-values-questions-facing-country>

<sup>3</sup> General responses on abortion acceptance and legality (i.e. allowing abortion on demand without gestational limits or medical justification vs. regulations or bans), parallels the opinions found from the June survey data from before the images were delivered in Ontario. Some provinces like Quebec and British Columbia are skewed much more in favor of abortion than respondents in other provinces. When controlling for that disparity, the findings are consistent between these two studies.

statistically significant. The results were statistically significant at a 99% confidence level (with a margin of error of + or – 5%).

15. This was true for every construct tested but one. This lone exception is that I found a 7% increase in those identifying as pro-life vs. pro-choice. The baseline sample and the follow-up sample were not different enough to have achieved statistical significance, at least not when maintaining a  $p \geq .05$  threshold to confirm less than a 5% chance that the relationship between abortion images and the viewers' feelings was merely due to coincidence. Every other test did meet that threshold.

16. In each analysis measuring the influence of these images on the viewers' abortion worldview, the respective p-values confirmed a relationship between viewing images of abortion victims and the viewers' increasingly negative opinion of abortion, and support for its legality was statistically significant and the relationship strong. This supports the conclusion that the images do change minds and influence viewers' feelings about abortion and political stances in the intended way: making them more sympathetic toward the unborn and less accepting of abortion in general.

17. For those who incrementally shifted their abortion worldview and permissiveness, the value was  $p = .02$  meaning there is only a 2% chance the mean overall increase of 15.95% (and 29.41% increase among those who identified as completely pro-life) could be attributed to something other than the images the respondents confirmed viewing—this held firm with changes in political views in favor of gestational limits of abortion legality.

18. Likewise, the overall shift toward a more conservative abortion policy vs. liberal approach of 16.88% was significant at  $p = .03$ . The loss of liberalism (9.2% fewer people believing abortion should be mostly legal) corresponded almost perfectly with an increase in conservatism (7.80%



who reported believing abortion should be mostly illegal). There is a less than 3% chance that this change was unrelated to the campaign.

19. Furthermore, the reaction to the images correlated to worldview and political ideology. These images increased negative feelings toward abortion in 90% of those who reported reacting to them and consequently, negative feelings increased one's support of gestational limits or other abortion restrictions. This is critical considering that those who felt generally positive about abortion were assuredly more liberal in their views on restrictions, and those who felt generally negative were overwhelmingly against abortion even in the first trimester.

20. The relationships between the images and decreased acceptance toward abortion were supported by Cramer's V scores indicating a strong relationship between the abortion victim images and the viewer's feelings about abortion and abortion policy. Cramer's V is a test that measures the strength of a statistically significant relationship between two variables. Correlation is possible from spuriousness but also from other contravening variables (where two variables are related to a third variable, not to each other). When Cramer's V indicates a strong relationship, this mitigates concern that some factor other than the independent variable(s) tested (X) is/are responsible for the change in the dependent variables (Y).

21. When it came to abortion perception (positive/negative) and political views (dependent variables in this study,  $X_1$  and  $X_2$ ), Cramer's V indicates a strong relationship to our independent variable: the abortion victim images. The score was  $v=0.756$  ( $v=1$  is the strongest possible relationship). Some people who feel negatively about abortion still support legality despite their personal objections, so it does not parallel perfectly. Nonetheless, the majority of answers to questions of political views correspond to one's feelings. These correlations were significant, but

the strength of the relationship is what supports the theory that positive/negative perception of abortion also impacts one's view on abortion legality.

22. Of those who were affected by the images, 66.9% reported increased negative feelings towards abortion, ten-fold more than those who said they had increased positive feelings (6.9%). Therefore, confirming that these images increase negative perceptions of abortion supports the other findings that show how this corresponds to an overall change in their worldview and political ideology. These images aptly convey the message that CLC wanted to send to lawmakers and other viewers at the press conference where the use of the signs was denied by the Parliamentary Policy Service ("**PPS**").

23. My analysis was the first to establish a statistically significant relationship between abortion victim images and public opinion, and the results were decisively in favor of their use by quantifying that these graphic images change minds and political views in favor of protecting unborn human life. A sample size of 95% confidence is needed for generalizability but any correlation must be less than  $p=.05$ , meaning that the established relationship has less than a 5% chance of being spurious or due to mere coincidence. This sample allowed 99% confidence that it reflects validly on the general population, and the relationship between correlations was strong.

24. While any scientific study with a sufficient degree of academic rigor and scope is still limited to the time and place where it was conducted, we know that these images shared in Ontario less than a decade ago confirm that they were effective in promoting the pro-life position when objectively and thoroughly evaluated. Therefore, as a scientist, all that I can authoritatively state with assurance is that these images were effective in this instance with this large, randomized sample and would need to replicate the study elsewhere with other respondents to substantiate

these findings by demonstrating the results hold up elsewhere, and to ascertain if the images affect populations differently based on location or nationality.

25. These images might be more effective with respondents in some locations or cultures than in others. However, it is important to understand that this study was not primarily about determining political opinions on abortion but rather, the impact these images had on people's perceptions about abortion which influenced acceptance of abortion legality. This involved assessing political opinions both before and after viewing the images to quantify the degree of impact upon each individual; to determine if the aggregate sum truly confirmed that it was indeed the images that shifted public opinion in either direction. Political opinions regarding abortion do vary geographically, even from province to province as indicated in the Ipsos Reid poll determining Quebec and British Columbia to be outliers compared to the rest of the country.<sup>4</sup>

26. Where one province is biased in favor or against abortion, it cannot validly represent the views of the average Canadian nor paint an accurate overall picture of how Canadians feel about this issue or the policies that govern it. Accordingly, more conservative and more liberal-leaning parts of the country need to all be sampled so these variances are included in national averages. That said, what is striking about this sample is that it was taken in one geographic area yet still reflected the median views on abortion by polls representative of Canadians nationwide when examined at the provincial level and at the median level.

27. The baseline data was consistent with national public opinion polls in a sample large enough to represent the entire population of Canada with 99% confidence. It did not skew in any direction, liberal or conservative. In such a way, it reflected the change that could be expected

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<sup>4</sup> Ibid

among average Canadians despite location and variances in the political ideology that dominantly supports or generally opposes abortion.

28. Further, pre-existing abortion views from one location to the next are relatively inconsequential because of the nature of this study. If the sample were taken in a location with an anti-abortion bias, those views would only limit the overall results because a population that is largely pro-life has fewer respondents who can shift their perspective towards the pro-life position. This made it impossible to cherry-pick respondents with the goal of making these images appear effective.

29. Given the nature of the images, they either change minds against abortion, or they do not change minds at all. There is not any symmetrical opportunity for the images to change perceptions in any direction. The only way pre-existing pro-life views can shift is in favor of abortion, or else they do not affect the results at all because there is no change. Conversely, a sample selected to be more sympathetic toward abortion would only validate the effectiveness of these images in a more pronounced way because there would be more respondents who could potentially shift their view toward opposing abortion.

30. Therefore, pre-existing abortion views cannot bias these results in a way that unduly advantages the case for graphic images. If researchers attempt to sample areas with more pervasive or extreme pro-abortion sentiments, the results would likely show a more pronounced difference after viewing the images since there is a greater capacity to moderate their views against abortion than those who already oppose it. Replicating the study in other geographic areas and cultures would be useful, but not because it is necessary to control for pre-existing views, as these are inconsequential.

31. The reason why more research is called for is to determine the degree to which other demographic, geographic, or cultural factors may moderate the way these populations respond. There are many variables that could make groups more or less receptive to change or desensitized to images of violence. The shift in opinion against abortion was statistically significant but there may be populations where fewer people are converted by this tool than those I studied. That said, the results of these surveys, conducted in Ontario, are of particular relevance to CLC which used them in determining their educational strategy.

32. My analysis provides credible support in favor of using graphic images to persuade. I am not aware of any comparable empirical evidence to the contrary. The Study suggests that graphic images are powerful persuasive tools. This means that graphic images are not one potentially effective tool among other equally supported strategies: to my knowledge, they are the single strategy for which we have scientific evidence affirming they actually work at changing public opinion at both the micro and macro levels.


33. There are no comparable alternatives to my knowledge that CLC can substitute in future press conferences that would be as effective in enabling them to achieve their goal of promoting the pro-life position. My research objectively affirms that they are vital educational tools.

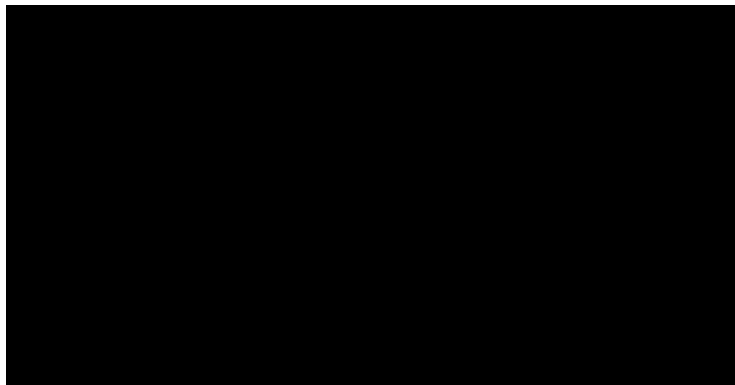
34. I certify that I am satisfied as to the authenticity of every authority or other document or record referred to in this affidavit.

35. I swear this affidavit is *bona fide* for no improper purpose.

AFFIRMED REMOTELY by videoconference by

[REDACTED]  
at the [REDACTED] in the [REDACTED],  
before me at the [REDACTED],  
in the Province of Ontario  
on the 17<sup>th</sup> day of January, 2025  
in accordance with O.Reg 431/20.

  
\_\_\_\_\_  
Hatim Kheir  
Barrister & Solicitor  
A commissioner of oaths  
in the Province of Ontario



This is **Exhibit “A”** referred to in the Affidavit  
of [REDACTED] sworn  
before me this 17th day of January, 2024.

A handwritten signature in cursive script, reading "Hatim Kheir", written over a horizontal line.

Hatim Kheir  
Barrister & Solicitor

Court File No.: CV-24-00094951-0000

ONTARIO  
SUPERIOR COURT OF  
JUSTICE

B E T W E E N:

CAMPAIGN LIFE COALITION and MAEVE ROCHE

Applicants

and

PARLIAMENTARY PROTECTIVE SERVICE

Respondent

APPLICATION UNDER section 11 of the *Courts of Justice Act*, R.S.O. 1990, c. C.43 and rules 14.05(3)(h) and 38 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194.

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ACKNOWLEDGMENT OF EXPERT'S DUTY

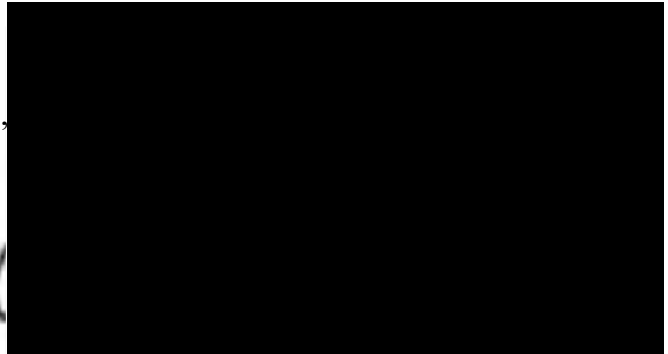
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1. My name is [REDACTED] [REDACTED].
2. I have been engaged by or on behalf of the applicants, Campaign Life Coalition and Maeve Roche to provide evidence in relation to the above-noted court proceeding.
3. I acknowledge that it is my duty to provide evidence in relation to this proceeding as follows:
  - (a) to provide opinion evidence that is fair, objective and non-partisan;
  - (b) to provide opinion evidence that is related only to matters that are within my area of expertise; and
  - (c) to provide such additional assistance as the court may reasonably require, to determine a matter in issue.
4. I acknowledge that the duty referred to above prevails over any obligation which I may owe to any party by whom or on whose behalf I am engaged.
5. I certify that I am satisfied as to the authenticity of every authority or other document or record to which I have referred in the expert report accompanying this form, other than:



- a. documents and records provided to me by or on behalf of the party intending to call me as a witness and consisting of evidence or potential evidence in the court proceeding that I have analysed or interpreted in my report; and
- b. authorities and other documents and records to which I have referred in my report only in order to address how another expert witness in the same court proceeding has used them in their report.

Dated this 25 day of October, 2024,



This is **Exhibit “B”** referred to in the Affidavit  
of [REDACTED] sworn  
before me this 17th day of January, 2024.

  
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This is **Exhibit “C”** referred to in the Affidavit  
of [REDACTED] sworn  
before me this 17th day of January, 2024.

A handwritten signature in cursive script, reading "Hatim Kheir", written over a horizontal line.

Hatim Kheir  
Barrister & Solicitor

# CCBR



## CANADIAN CENTRE FOR BIO-ETHICAL REFORM

**END THE KILLING**.ca

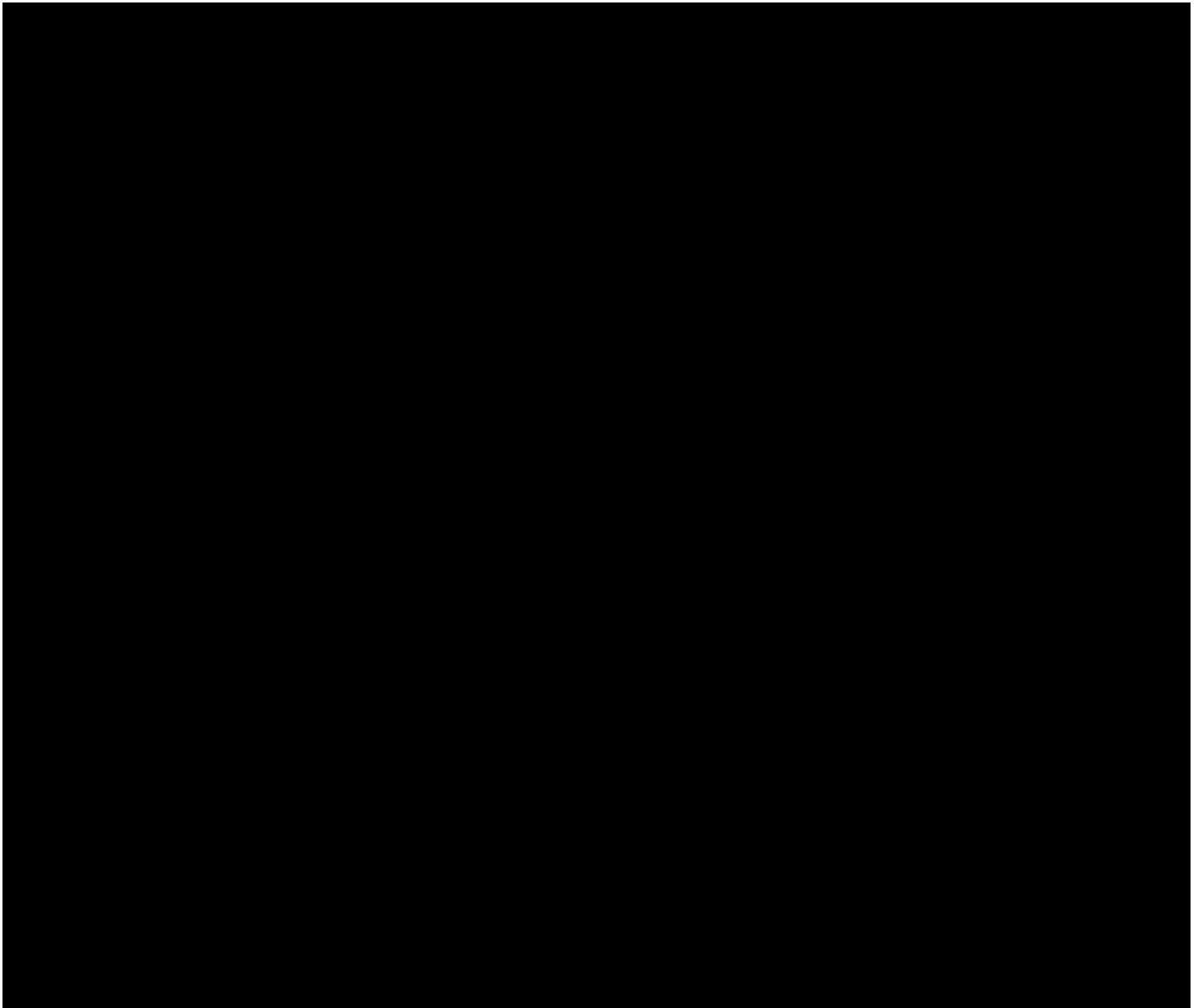
**A Statistical Analysis on the Effectiveness of Abortion  
Victim Photography in Pro-Life Activism**



# Contents.

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# Executive Summary.

The use of abortion victim imagery in pro-life outreach is perhaps one of the most enduring debates within the pro-life movement. Although proponents cite cases of lives saved and minds changed supporting the effectiveness of the strategy, opponents insist these images impede public receptiveness to other strategies they claim could save more lives. They suggest, therefore, that these images do not advance the pro-life cause, but rather set the cause back by damaging the public opinion of the pro-life movement.



To test this theory, the Canadian Centre for Bio-Ethical Reform (CCBR) launched an effort and commissioned a scientific study on the impact of abortion victim imagery. CCBR developed a survey administered by an independent party—immediately preceding and following simultaneous campaigns in selected geographic areas. By canvassing thousands across several neighbourhoods and surveying 1,741 diverse respondents, results found a statistically significant shift in pro-life worldview, a greater negative perception of abortion, a decreased degree of



permissiveness and liberalism towards abortion law, and a significant gain in pro-life political views after seeing abortion victim imagery.

Those identifying as completely pro-life increased by nearly 30% following the campaign, with those identifying as pro-abortion also decreasing in their degree of remaining support for abortion. Overall, there was a statistically significant gain of nearly 17% toward a pro-life worldview. Those who were generally pro-life had an overall gain of 7%, with the corresponding loss (of those generally pro-abortion), also 7%. The degree of permissiveness toward abortion was statistically decreased and support for incremental pro-life gains, like gestational limits, substantially increased by 15% overall.

Feelings about abortion shifted toward a negative abortion view with fewer reporting feeling positive about abortion after CCBR's campaign showed what abortion truly is, although these results were not statistically significant. Additional analysis found that the strength of one's feelings toward abortion were conclusively parallel to political views about abortion, with those who felt strongly positive towards abortion favoring no legal restrictions, and those who felt strongly negative towards abortion favoring complete prohibition of abortion. This suggests that changing how the public feels about abortion impacts how people vote for candidates who would be willing and able to enact legal restrictions that actually save lives. Abortion victim imagery was effective at changing these feelings, with upwards of 90% of people responding that seeing these images increased their negative feelings towards abortion.

Those who had previously seen an image of abortion victim imagery before the CCBR campaign still reported that the other images increased negative feelings as well. This increase was statistically greater following the CCBR campaign, indicating that CCBR's presentation or choice of images for the campaign were more effective than images they had previously seen. This still suggests, nonetheless, that abortion victim imagery itself, regardless of presentation, is intrinsically effective at altering previously positive perceptions on abortion and changing the culture.

Ultimately, opponents' claims that abortion victim images are ineffective at changing public opinion are unsupported, as was the claim that this strategy is counterproductive or irreconcilable with other strategies. This indicates a loss from those inhibiting the abortion victim imagery strategy, since this strategy is scientifically established as an effective tool. More research is needed to determine where and when this strategy, among others, is the most fruitful choice for pro-life outreach.

# Introduction.

Pro-life activists and organizations that employ images of abortion victims as a strategy to educate the public about the horrors of abortion, face substantial criticism and opposition to their efforts. This is certainly to be expected from those who identify as pro-abortion and are uncomfortable or unable to defend their position when the victims are visible.<sup>1</sup> However, pro-abortion opposition to abortion imagery often pales in comparison to the hostility from those who avow themselves as pro-life, yet are opposed to the use of victim imagery, even when they credit this strategy for their own conversion.<sup>2</sup> Pro-life people who decry the use of abortion victim photography suggest that the images not only fail to shift public perception against abortion, and in so doing, fail to advance the pro-life cause. Rather, they say that these images set the movement back by damaging public opinion of the pro-life movement and public receptiveness to other strategies that they assert *are* effective.



In spite of the frequency and fervor of these debates spanning for several decades, this topic has been virtually ignored in scientific literature. The effectiveness of these images on shifting public opinion is a controversy that predates later debates, such as the effectiveness of state-level abortion regulations versus a national ban. Nonetheless, while the personhood versus incrementalism debate<sup>3</sup> is informed by a wealth of studies from pro-life scholars<sup>4</sup> and pro-abortion thinktanks<sup>5</sup> on the impact these laws have on abortion rates, the abortion victim images debate continues devoid of any scientific evidence to defend or condemn their use. Furthermore,

while those opposed to incremental laws represent a small minority (many of whom do not identify as members of the pro-life movement or relegate themselves to distinct factions), opponents of abortion victim imagery constitute a large number, and penetrate a diverse array of pro-life organizations that have sufficient influence where they can. Often, they join government officials to inhibit other organizations who swear to the effectiveness of the use of abortion victim imagery.<sup>6</sup> This makes the need to study these claims even more critical than what the pro-life movement has been and will continue to study.

There are informal attempts like dueling commentary and anecdotes to offer evidence for each position, pro and con. Those in favour, offer their experience to support abortion victim imagery as effective,<sup>7</sup> while those opposed, with limited to no observation or experience, also attempt to provide a rationale for their perspective. At best, they assert with data they have on the effectiveness of their own approaches that these images would repel those they serve in their own organizations.<sup>8</sup>

To test these hypotheses, substantiate the effectiveness of the abortion victim imagery strategy, and improve the impact of their efforts, the Canadian Centre for Bio-Ethical Reform (CCBR) commissioned several sets of a scientific survey to gauge public opinion on abortion before and after their extensive campaigns in 2015. CCBR delivered postcards with these images to thousands, and commissioned an independent party to survey 1,741 respondents, a sample size sufficient to gauge public opinion within a five-point margin, with 99% certainty that results are generalizable to the entire population of Canada, which is 35,749,600.<sup>9</sup>



# The Study.

The Canadian Centre for Bio-Ethical Reform (CCBR) educates the public with images of abortion victims displayed in a variety of approaches. These include “Choice” Chain, where groups of activists, each with individual handheld signs and literature, attempt to spark dialogue in heavy traffic pedestrian areas; a *Truth Truck*, otherwise known as the *Reproductive “Choice” Campaign*, features abortion victim imagery, and is driven on major roadways during heavy volume hours; the *Genocide Awareness Project* events, which are travelling projects that erect large panels on college campuses and use panels and banners in public areas like intersections or highway overpasses. CCBR also creates literature to disseminate: drop cards that are small and can be distributed liberally, and larger postcards for direct mail and canvassing neighbourhoods door to door.<sup>10</sup>



For years, CCBR has evaluated the effectiveness of their efforts by public response, either in conversations at face-to-face events, or by calls and correspondence. They have also utilized surveys to gauge public opinion on abortion and to attempt to determine the effectiveness of their campaigns. With such large-scale events, pinpointing enough respondents who witnessed their efforts presented a limitation. Even if enough respondents could be found, survey answers after an event would be likewise limited without baseline data to establish public opinion before the campaign, to demonstrate any change, and to determine the degree of change following the campaign. Campaigns themselves would need to reach a substantial sample size in order to be representative of public opinion and measurable through a survey.

To overcome these limits, CCBR targeted specific geographic areas to canvass with postcards. These postcards were delivered directly to the mailboxes in these specific areas, to ensure delivery was not impeded by post office personnel. CCBR crafted a survey and hired the independent company, Blue Direct,<sup>11</sup> to collect responses in these target areas immediately prior to and following each campaign. Campaigns included more than one area to increase validity and were conducted simultaneously (to control for time): first in June of 2015, and then in September of 2015.

The survey employed before and after each campaign asked specific questions about the respondent's opinion and perception of abortion, and their political views on when abortion should be allowed, or if it should be restricted by law. The sample included demographic data on respondents from gender, age, language spoken, and whether or not there were children in the home.

Questions asked whether the respondent believed that abortion, in general, should be legal, mostly legal, mostly illegal, or illegal. The survey also asked whether abortion should be legal, mostly legal, mostly illegal, or illegal in all three trimesters of pregnancy to determine how the respondent would qualify their overall answer. For example, mostly legal could mean that the respondent thought abortion should be limited to the first trimester, whereas mostly illegal could be those who think abortion should sometimes be permitted in rare cases like rape, incest, fetal anomaly, or when posing a threat to the mother. The survey also asked the respondents' feeling about abortion on a four-point scale, from positive, mostly positive, mostly negative, and negative. It inquired if seeing an image of an abortion victim changed their feeling of abortion, and if so, if it increased positive feelings or negative feelings.

# Research Methods.

The dataset yielded 1,741 respondents and the subsets were comparable: 845 before the campaign and 896 after. Some answers lacked responses and were excluded from the analysis of that item. Initial frequencies showed no disparities in demographics between the two datasets that could skew results. Data was identified by campaign and coded as 'before' or 'after', so campaigns could be compared individually and as a whole. The subsets were comparable: n=845 before the campaign, and n=896 after the campaign. Each subset was a sample size sufficient to gauge public opinion within a five-point margin, with 99% certainty that results are generalizable to the entire population of Canada in 2015: 35, 749,600.<sup>9</sup> These were not paired samples that showed changes in individual opinions, but paired samples that showed changes in public opinion.



Responses were analyzed as written in the survey, and then taken a step further and recoded into measures that indicate the degree of support for abortion. They could also yield and measure change, and then they were subjected to analysis otherwise impossible with nominal or ordinal data. Moreover, these new variables more accurately represented respondent viewpoints, given the totality of answers. For example, one who thought abortion should be legal (but not mostly

legal) yet would restrict it to the first trimester and has a generally negative view of abortion, has a different overall perspective than one who believes abortion should be legal, supports no restrictions, and views abortion as strongly positive.

In addition to creating new and complex indicators of abortion perception, variables were also useful when simplified into new variables of dichotomous groups that could segregate those generally in favour of abortion, to those generally opposed. Those who thought abortion should be completely illegal, or at least mostly illegal, were coded as “generally pro-life” and those who thought abortion should be completely legal, or at least mostly legal, were coded as “generally pro-abortion.” For those who felt strongly positive or somewhat positive about abortion, they were coded as “generally positive,” while those who felt somewhat negative or strongly negative about abortion were coded “generally negative.” For those who would permit abortion at least in some cases, a measure of permissiveness was created based on how extreme those pro-abortion views were, from restricted to the first trimester, to those who wanted no restrictions, even in the third trimester. This was also coded as another variable: those who were “generally liberal” on abortion and supported even post-viability and late-term abortions, and those who were “generally conservative” and would permit abortion in the first trimester only.

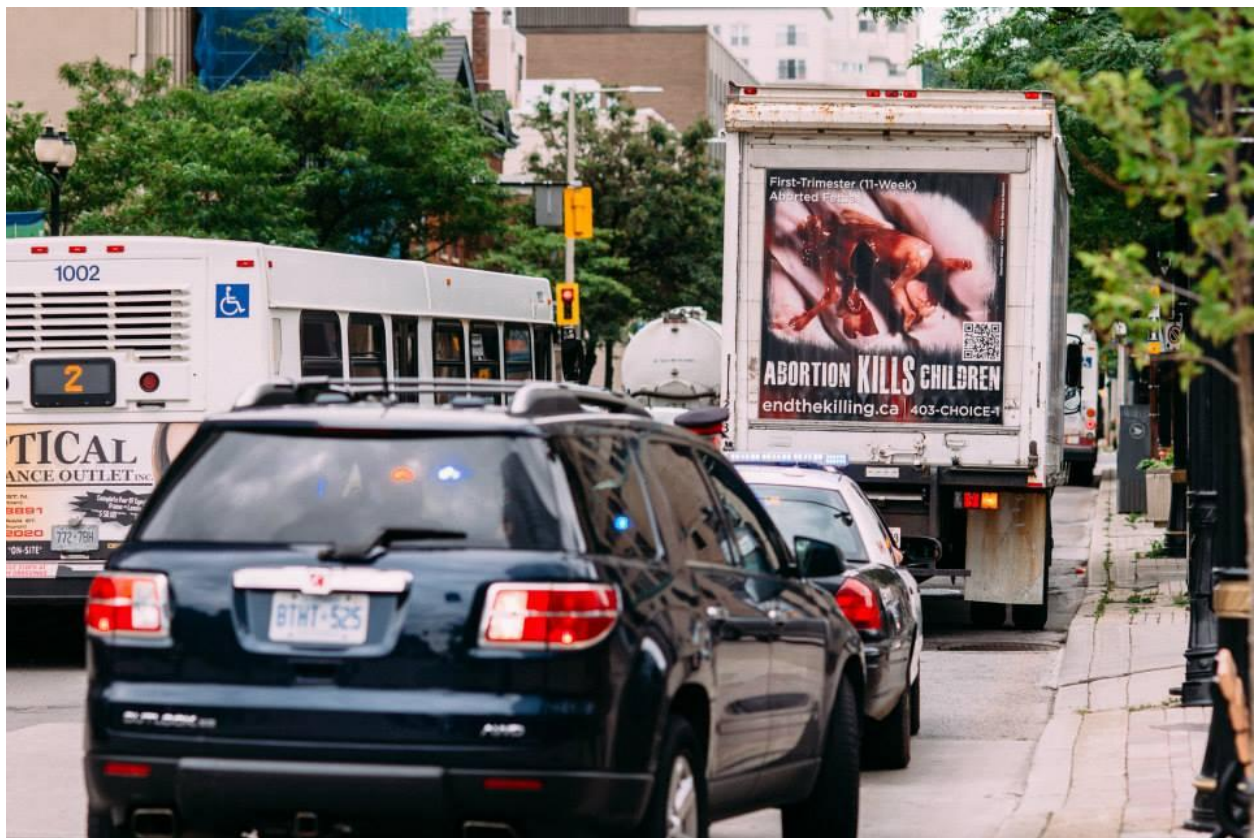
Since many new explanatory variables were created from the same data and measured the same construct, the new variables were contrasted against original responses and comparable variables to ensure validity. Of course, those who felt generally positive about abortion were assuredly more liberal in their views on restrictions, and those who felt generally negative were overwhelmingly against abortion even in the first trimester. This supports the theory that perception about abortion and altering perception affects a person’s stance on abortions legality. All new variables were significant and the strength of the relationship with Cramer’s V statistic as a perfect  $v=1$ .

The analysis contrasted ‘before’ responses and ‘after’ responses for all the variables to determine if there was a statistically significant change for each item. These were done in contingency tables: first for the dichotomous variables and then for the original responses. Relationships were determined as well as the strength of the relationship. For any change determined, the next step would be determining the degree of change through ordinal regression to measure the specific difference in ordered responses, i.e. how many changed their view on abortion from “legal” to the lesser “mostly legal,” or went from feeling only “somewhat negative” about abortion to “strongly negative.”



# Effects of Abortion Imagery Campaigns on Public Opinion.

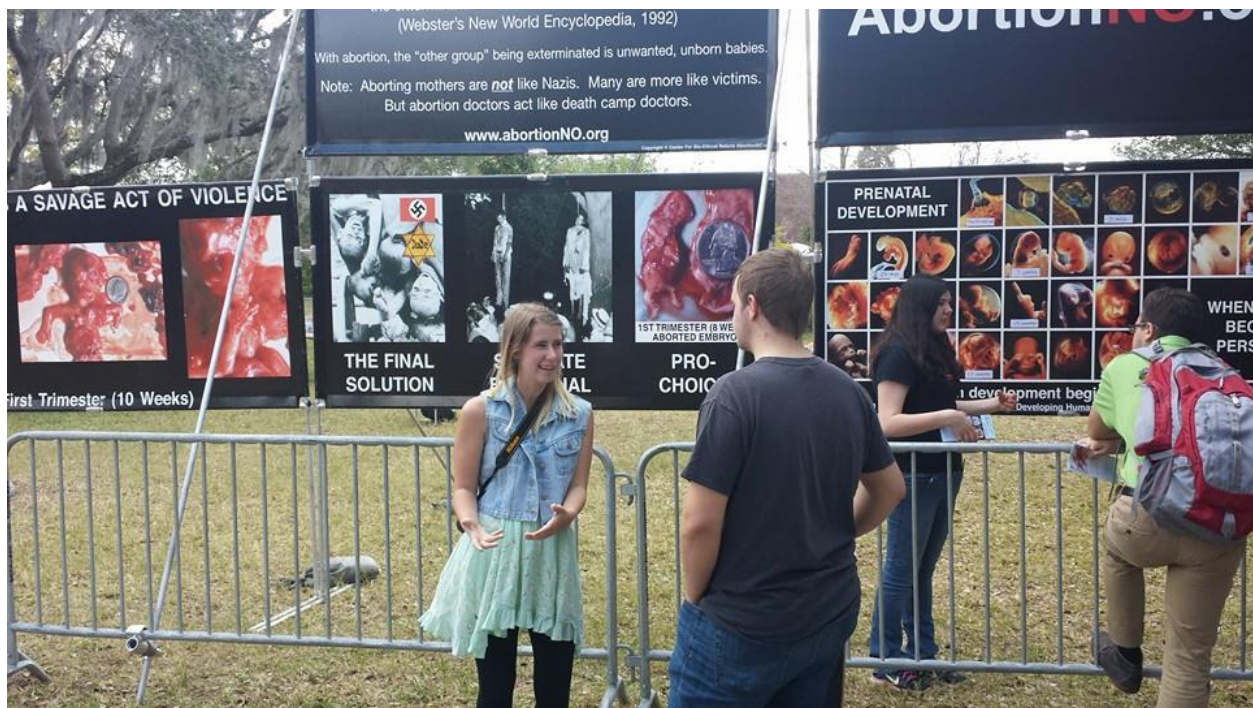
Across all survey items and constructs, pro-life views increased and pro-abortion views decreased. Negative perception of abortion increased and positive perception decreased. On the mean, those who were “generally prolife”, “generally conservative,” or had a “generally negative” view of abortion had a statistically significant increase. On the other hand, those who were “generally pro-abortion,” “generally liberal,” or had a “generally negative” view of abortion had a statistically significant decrease.



This validates the fact that the shift CCBR seeks in public opinion is changing in the right direction. Since sample sizes are not identical and neither are respondents, therefore statistical significance, rather than frequencies, is the only valid measure of change and whether this change could be due to the CCBR campaign.

## Increase in Pro-Life Worldview, Decreased Pro-Abortion Sentiment

The survey questioned respondents about their general and specific view of when abortion should be legal. Those who favoured complete abortion on demand or complete prohibition, were the fringe minority on polar ends. Most were leaning toward regulation after the first trimester. Those who wanted complete prohibition or a first-trimester limit were considered more pro-life than pro-abortion, while those who would keep late-term second trimester and full-term third-trimester abortion on demand were clearly more pro-abortion. The first table indicates the shift in worldview from before and after the CCBR campaign.



This is measured by looking at the direction of change toward a more pro-life worldview and away from a pro-abortion worldview. When analyzing the upper threshold for pro-abortion views, such as those that support total legality, and those who feel strongly positive about abortion – this threshold should only decrease. While this may show an increase in moderate views or in those who are somewhat positive toward abortion, this is not an increase in pro-abortion sentiment, unless the threshold for pro-life views decreased in the pro-abortion direction.

However, in regards to the degree of support for abortion on a four-point scale from total prohibition, mostly prohibited, mostly permitted, and completely permitted, the support for legal abortion decreased and the pro-life view increased. In the case of incremental changes in the

degree of abortion support, this was statistically significant with  $p=0.02$ . There was a decrease in the most extreme pro-abortion stance and a trend toward the more pro-life view. Table 1 has these results, showing that all percentages shifted away from abortion legality.

<b>Table 1: Impact of CCBR Abortion Victim Image Campaign on Abortion Worldview*</b>				
	<b>Before CCBR Abortion Victim Image Campaign</b>	<b>After CCBR Abortion Victim Image Campaign</b>	<b>Pro-Life Percentage Points Gained</b>	<b>Cultural Impact (Percentage Increase in Pro-Life Views)</b>
Completely Pro-Abortion	15.30%	13.60%	1.70%	11.11%
Moderately Pro-Abortion	18.50%	16.00%	2.50%	13.51%
Mildly Pro- Life	39.00%	35.20%	3.80%	9.74%
Completely Pro-Life	27.20%	35.20%	8.00%	29.41%
<b>Total Overall Cultural Impact: 15.95%</b>				

**\*Statistically Significant at  $p=0.02$**

The upper threshold of abortion on demand with no restriction is accurately labeled with completely pro-abortion. However, those mildly pro-abortion that supported abortion in limited cases would not be accurately identified as completely pro-life. Nonetheless, these individuals who wish for abortion to be “mostly illegal” (just not illegal), as more closely ideologically aligned with those who are completely pro-life than those who are moderately pro-abortion.

For this reason, a new variable was created to split the respondents into ‘generally pro-life’ and ‘generally pro-abortion.’ Statistical significance was found with the four-point scale, but was just shy of statistical significance. While the percentage of those who were pro-life increased by 4.92%, and those identifying as pro-abortion decreased 9.16%, this gain was not statistically

significant due to the change in those identifying as pro-life falling within a 5 percentage point margin of error.

The total cultural impact is an overall 7.04% gain towards a pro-life worldview. This was not statistically significant to suggest the change was due to the campaign, but nonetheless, the frequencies are in the right direction. Results are detailed in Table 2 below.

<b>Table 2: Impact of CCBR Abortion Victim Image Campaign on General Abortion View</b>				
	<b>Before CCBR Abortion Victim Image Campaign</b>	<b>After CCBR Abortion Victim Image Campaign</b>	<b>Pro-Life Percentage Points Gained</b>	<b>Cultural Impact (Percentage Increase in Pro-Life Views)</b>
Generally Pro-Life	48.80%	51.20%	4.80%	9.16%
Generally Pro- Abortion	52.40%	47.60%	2.40%	4.92%
<b>Potential Overall Cultural Impact: 7.03%</b>				

## Increased Conservative Views on Abortion, Decreased Liberal Abortion Views:

While not all who changed from ‘generally pro-abortion’ moved to ‘generally pro-life,’ nearly a tenth of respondents no longer thought abortion should be legal or mostly legal after the first trimester, even if they did not wish to make it totally illegal or mostly illegal in the first trimester. Since the increase to pro-life was not quite statistically significant, pro-life respondents were controlled for, in an analysis on the nearly substantial 9.16% that no longer identified as thinking abortion should, overall, be mostly legal.

Although it was not statistically significant, it can be assumed that 4.92% did identify as more pro-life, by excluding just those who saw an abortion victim and yet did not convert to the pro-life cause. Examining just those who supported legal abortion, it was possible to determine how



many were liberal in their support of legal abortion on demand (into the second and third trimesters,) and how many were conservative in wanting abortion on demand, yet wanting it to be legal only in the first trimester. Since there are nuances like rape, incest and health that could not be addressed in detail during the survey, those who thought abortion should be “mostly illegal” in later gestation were more conservative than those who thought abortion should be “mostly legal.” The gain in a more conservative view parallels the gain in the liberal view. Table 3 shows this gain.

<b>Table 3: Impact of CCBR Abortion Victim Image Campaign on Degree of Liberalism*</b>				
	<b>Before CCBR Abortion Victim Image Campaign</b>	<b>After CCBR Abortion Victim Image Campaign</b>	<b>Pro-Life Percentage Points Gained</b>	<b>Cultural Impact (Percentage Increase in Pro- Life Views)</b>
Liberal	54.60%	45.40%	9.20%	16.85%
Conservative	46.10%	53.90%	7.80%	16.92%
<b>Total Overall Cultural Impact: 16.88%</b>				

**\*Statistically Significant at  $p=0.03$**

Conservative sentiment switched from the minority to the majority by a virtually identical margin. There was a statistically significant gain, lost from a pro-abortion liberal worldview, to a (not completely, but incrementally) more pro-life conservative worldview, following the abortion victim image campaign. There was an almost 17% overall increase in the number of people who were conservative and a corresponding decrease in those who were liberal. Since this was statistically significant with  $p=0.03$  at the 0.05 level, this indicates the change was not due to randomization or chance, but more likely the intervention of CCBR campaigns.

## Abortion Victim Images Increase Negative Feelings, and Feelings Correspond to Public Policy Positions

This study examines the effect of abortion victim images, so the survey questioned regarding the images specifically. Respondents were asked if pictures of abortion victims affected their feelings about abortion, and whether positively or negatively. The results from viewing any image of abortion victims (not just a CCBR campaign image), was that it increased negative feelings, but that this increase was higher following CCBR's image choice and method of delivery.

Feelings on abortion are critical because how one feels is statistically shown to correspond to one's view of abortion legality and degree of liberalism. While those who think negatively of abortion may still support its legality, the degree of permissiveness parallels these feelings. Those who feel strongly negative about abortion are more likely to support a total ban, much like those who view abortion as strongly positive support total legality. There are incremental parallels as well, as evidenced in Figure 1.

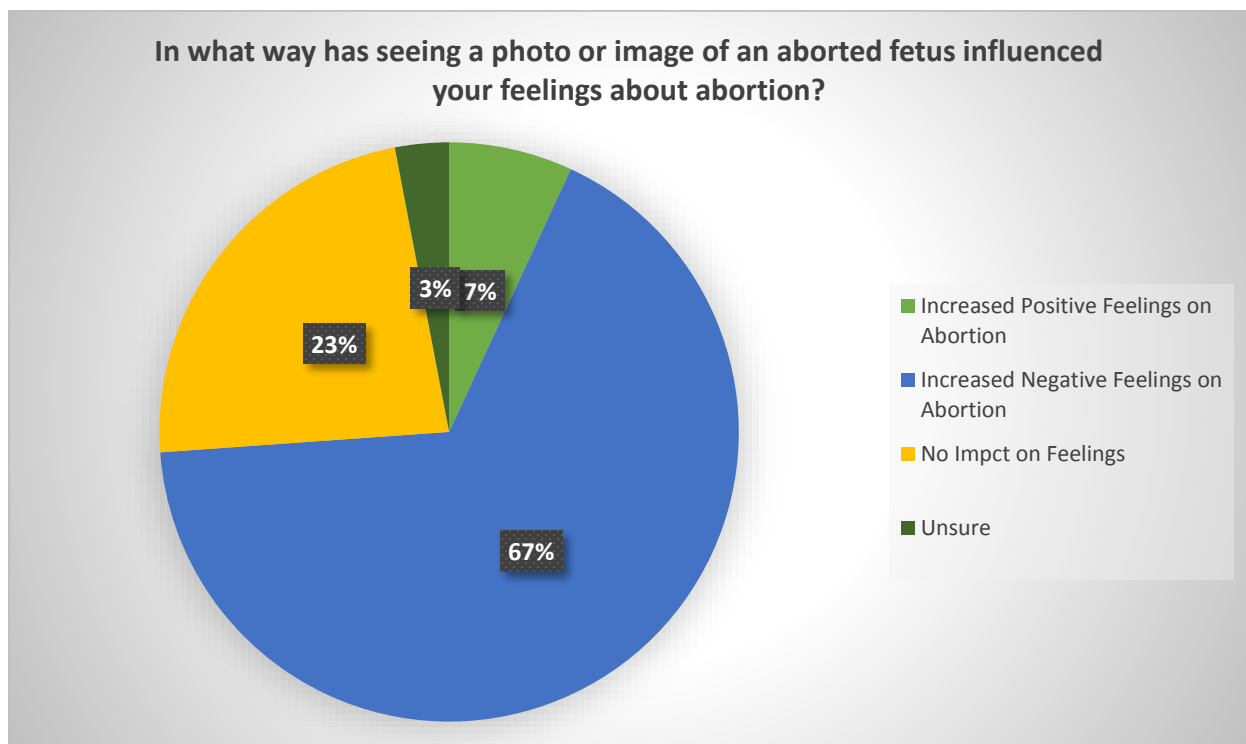


Figure 1

The correlation between these are significant, but the strength of the relationship is the key evidence. Cramer's V indicates a relationship of  $v=0.756$  which shows a strong relationship, but one which does not parallel perfectly and suggest the two are the same construct. People who feel negatively about abortion still support legality, so it does not parallel perfectly, but 75% of answers correspond to one's feelings.



When looking simply upon the impact of abortion victim imagery themselves, there is a subset of viewers that indeed declared no reaction to these images. Unfortunately, those who claim the images had no impact are more likely to be pro-abortion than pro-life. Pro-life persons indicated no reaction only 20% of the time, and negative thereafter. When including the 26.7% of those undecided who declared themselves unmoved by these images, a disturbing 53.3% supported abortion. This is the target audience, not the 20% who already knew what abortion entails and therefore reject it.

Overall, results show overwhelming negative feelings after viewing the image: 66.9%, ten fold more than those who say they had increased positive feelings (6.9%). Figure 1 does indicate that the 23% are not affected overall, but this does not indicate public relations damage, rather just those resolute or apathetic about abortion. If isolating simply those affected by the images, the results are much more stark.

A majority of people are affected by abortion victims, and when they are, over 90% increase their negative view of abortion. Figure 2 shows this contrast.

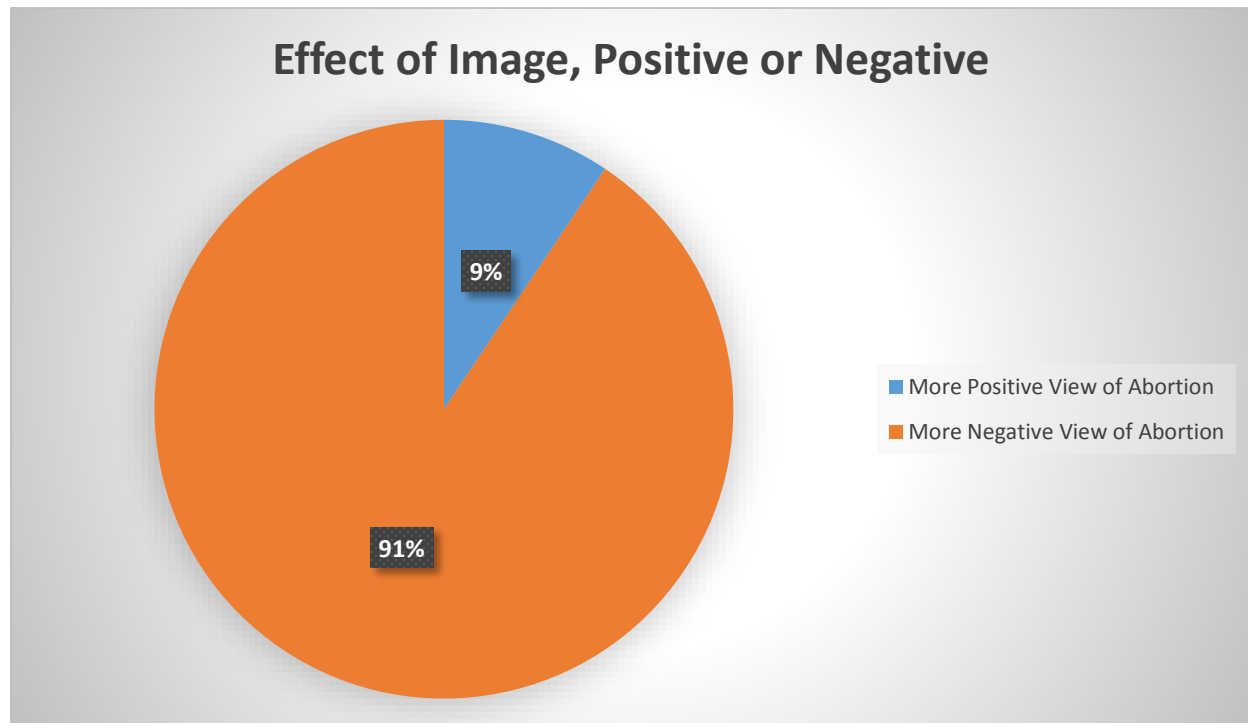


Figure 2

The overall difference between increased negative feelings attributed to the CCBR campaign was not statistically significant (1.2%), as evidenced by Table 3. It is important to note that this table, in spite of lacking statistical significance, still favours the pro-life direction all the same. The results in themselves indicate that abortion victim images increase negative feelings against abortion, so this modest gain is simple encouragement that CCBR could indeed be conveying this message with greater acumen than other uses of abortion victim imagery. As well, it does so without impugning other campaigns. Table 3 shows how these images change people's overall feelings when they think about abortion, after seeing victims of abortion in a CCBR campaign.

<b>Table 3: Impact of CCBR Abortion Victim Image Campaign on Abortion Feelings</b>				
	<b>Before CCBR Abortion Victim Image Campaign</b>	<b>After CCBR Abortion Victim Image Campaign</b>	<b>Pro-Life Percentage Points Gained</b>	<b>Cultural Impact (Percentage Increase in Pro-Life Views)</b>
Generally Positive Feelings About Abortion	37.80%	36.60%	1.20%	3.17%
Generally Negative Feelings About Abortion	62.20%	63.40%	1.20%	1.93%
<b>Potential Overall Cultural Impact: 1.2%</b>				

## Incremental Shift in Abortion Acceptance and Legal Permissiveness

Examining just those who had not converted to the complete pro-life worldview of total prohibition shows clear incremental changes in the pro-life direction. Frequencies do illuminate the overall results. It also shows potential incremental change. Answers that appear negative, like an increase in those who are moderately or mildly pro-abortion, show that there is more likely to be an incremental gain according to the overall results.

This is measured by looking at the direction of change toward a more pro-life worldview, and away from a pro-abortion worldview. When analyzing the upper threshold for pro-abortion views such as those that support total legality, and those who feel strongly positive about abortion- this threshold should only decrease. While this may show an increase in moderate views or of those who feel somewhat positive toward abortion, this is not an increase in pro-abortion sentiment unless the threshold for pro-life views decreased in the pro-abortion direction. Those views should only increase. Without significance, it is not possible to attribute these changes to the campaign rather than to change, but they do show a potential shift in the making. In the case of incremental changes in the degree of abortion support, this was statistically significant with  $p=0.02$ . There was a decrease in the most extreme pro-abortion stance, and a trend towards the more pro-life view.



# Conclusion.

Opponents' claims that abortion victim images are ineffective is unsupported by a statistically significant gain in public opinion. There was a statistically significant gain in those who were generally pro-life, and a corresponding loss of those generally pro-abortion: an overall 17% gain in anti-abortion political view (permissiveness) rather than pro-abortion after the campaign. The degree of permissiveness toward abortion was statistically decreased and support for incremental pro-life gains like gestational limits, substantially increased.



Those identifying as completely pro-life increased by nearly 30% following the campaign, with those identifying as pro-abortion decreasing also in their degree of remaining support for abortion. Overall, there was a statistically significant gain of nearly 17% towards a pro-life worldview: those who were generally pro-life and the corresponding loss of those generally pro-abortion. As well, there was an overall 7% gain in those identifying as pro-life rather than pro-abortion after the campaign. The degree of permissiveness towards abortion was statistically decreased and support for incremental pro-life gains (like gestational limits) substantially increased by 15% overall.

Feels about abortion shifted significantly toward a negative abortion view, with fewer reporting feeling positive about abortion after CCBR's campaign, showing what abortion truly is. Additional analysis found that the strength of one's feelings toward abortion were conclusively parallel to political views about abortion, with those who felt strongly positive about abortion favouring no legal restrictions, and those who felt strongly negative favouring complete prohibition. This suggests that changing how the public feels about abortion impacts how they vote for candidates willing and able to enact legal restrictions that actually save lives. Abortion victim imagery was effective at changing these feelings, with upwards of 90% responding that seeing these images increased their negative feelings toward abortion.

Those who had previously seen an image before the CCBR campaign still reported that other images had increased negative feelings as well. This increase was statistically greater following the CCBR campaign, indicating that CCBR's presentation or choice of images for the campaign was more effective than images they had previously seen. This still suggests, nonetheless, that abortion victim imagery in itself, regardless of presentation, is intrinsically effective at altering previously positive perceptions on abortion and changing the culture.

Based on a single campaign this change is not drastic, yet for every variable there were marked incremental shifts in the desired direction toward more pro-life public opinion. Respondents still report as pro-abortion, but fewer do. Those who do, demonstrate less enthusiasm and greater support for abortion restrictions. Opposing claims that abortion victim images are ineffective at changing public opinion can only be supported if effectiveness is qualified as an unrealistic, instantaneous, and drastic conversion against all abortion. However, there was no evidence to support claims that the strategy of abortion victim images does any harm whatsoever, or that it inhibits other strategies.

# Endnotes.

<sup>1</sup> Erdreich, Sarah (October 8, 2015). The Dark History of the Right's Graphic, Misleading Abortion Images *Talking Points Memo*

<sup>2</sup> Hatten, Kristen (June 19, 2012). A Graphic Image Converted Me to Pro-Life; Now Here's Why I Am Against Graphic Images *Live Action News*

<sup>3</sup> Rogers, Jay (June 17, 2014). "Incrementalism vs. Immediatism" – Strategy of the National Personhood Alliance *Personhood.org*

<sup>4</sup> New, Michael (July 17, 2012). Casey at 20: Pro-Life Progress Despite a Judicial Setback *The Public Discourse*

<sup>5</sup> Guttmacher Institute (March, 2016). Fact Sheet: Induced Abortion in the United States *Guttmacher.org*

<sup>6</sup> Strand, Paul (January 15, 2013). Graphic Abortion Signs Ban Threat to Free Speech? *Christian Broadcasting Network*

<sup>7</sup> Gray, Stephanie (September 18, 2012). Ending the Killing: Why Graphics Images of Abortion are Necessary *Live Action News*

<sup>8</sup> Pauker, Paul (September 19, 2012). Why Stephanie Gray's Argument is Wrong (and Misguided) *Live Action News*

<sup>9</sup> Statistics Canada (January 7, 2016). Population and Dwelling Count, Census Program [www.statcan.gc.ca](http://www.statcan.gc.ca)

<sup>10</sup> Canadian Centre for Bio-Ethical Reform (2015). Projects [Unmaskingchoice.ca](http://Unmaskingchoice.ca)

<sup>11</sup> Blue Direct (2013). IVR Voter ID and Polling [www.bluedirect.ca](http://www.bluedirect.ca)



**ONTARIO SUPERIOR COURT OF JUSTICE  
(Ottawa)**

B E T W E E N:

**CAMPAIGN LIFE COALITION and MAEVE  
ROCHE**

Applicants

— and —

**PARLIAMENTARY PROTECTIVE  
SERVICE**

Respondent

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**AFFIDAVIT OF** 

*Sworn April 25, 2025*

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**Brandon Crawford  
Jocelyn Rempel**

**EDELSON FOORD LAW**



Counsel for the Respondent