

**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

AFFIDAVIT OF [REDACTED]
Sworn February 26, 2025

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

1. I have been employed with the Parliamentary Protective Service (PPS) since its creation in 2015. From 2008 – 2015, I worked with the House of Commons Security Services. I have been a corporal for approximately six years. I am currently on the Exterior Operations team which patrols the grounds of Parliament Hill to ensure security and safety of all who attend Parliament Hill.
2. On May 10, 2023, I was working with the Exterior Operations team. My shift that day was from 7am – 7pm. In the late morning, I observed a group forming on the East lawn of Parliament

Hill. I could tell they were there for a gathering because they went straight to the lawn and appeared to have equipment to set up. I drove over to the group.

3. My normal practice when approaching a group is to ask who the organizer is and to speak with them about what they have planned, what equipment they have, and to explain any relevant rules. It is our duty to know the Rules of the Hill and to share them with people on the grounds.

[REDACTED] of the Campaign Life Coalition (CLC), the group who attends Parliament Hill for the yearly March for Life, was identified as the organizer of the group on the East lawn.

4. As I got closer, I could see the group had graphic signs. The signs had blown up images of aborted fetuses. I indicated to [REDACTED] that I understood the Rules prohibited showing the graphic images of the fetuses on Parliament Hill. I asked if he had a permit and he said he did not. I asked him for a few minutes to confirm with the Planning and Event Management Unit (PEMU) on how to proceed.

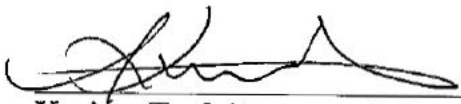
5. I called [REDACTED] on my cell phone because I knew he was on duty with PEMU that day. I asked him whether PEMU was expecting a demonstration by the CLC on the East lawn. He indicated that he was not aware of a demonstration and said he was on his way over. He arrived in 5-10 minutes. I remained in sight of the group while I was waiting for him. When [REDACTED] arrived, I stayed back and allowed him to speak with [REDACTED]

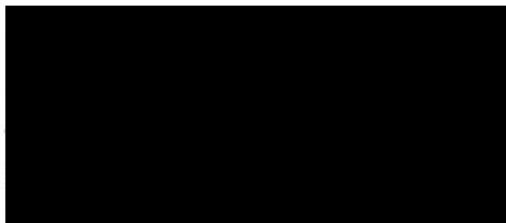
6. After his conversation with [REDACTED] came back and told me that he was not going to allow the graphic images to be shown. The demonstrators left the signs on the lawn face down. Our interactions were peaceful and civil. [REDACTED] and I watched the CLC hold their press conference to ensure they did not show the signs.

7. Asking the CLC not to show the signs did not feel controversial at the time. We followed the Rules of the Hill, which prohibited messages that are obscene, offensive, or that promote hatred. I know the March for Life has happened yearly for a long time. To the best of my knowledge, the graphic imagery the CLC wanted to show on May 10, 2023 had never been allowed at their demonstrations on Parliament Hill.

8. Parliament Hill is a very political and sensitive environment. As a member of the PPS, I work to find a compromise that both the demonstrators and PPS can live with. Many different people come to the Hill to visit and express themselves. Children visit daily. We allow people to come to Parliament Hill to say whatever they want to say for whatever their cause is. We do not take a position on it. The Rules do not prevent a demonstration from happening, they restrict what physical items demonstrators can use. We ask that the demonstrators compromise slightly to follow the Rules of the Hill so they can still express themselves and we can make sure the public is safe and secure.

Sworn before me at the [REDACTED] in the
Province of [REDACTED], this 26 day of February,
2025.


**Karima Toulait, a commissioner
of oaths (LSO#: 67629L)**



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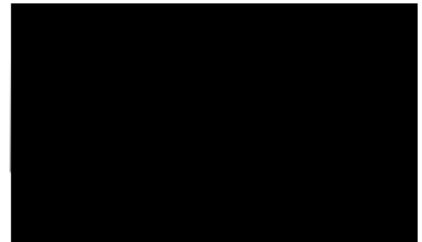
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**Brandon Crawford
Jocelyn Rempel**

EDELSON FOORD LAW



Counsel for the Respondent