

**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 February 26, 2025*

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

*My role at the Parliamentary Protective Service*

1. I have been a constable with the Parliamentary Protective Service (PPS) at Parliament Hill in Ottawa, Ontario for 6 years. I spent one year as a detection specialist before moving to the protective officer role. I was on assignment with the Planning and Event Management Unit (PEMU) from approximately December 2022 – July 2024.
2. Members of the PEMU coordinate with individuals organizing events on Parliament Hill. PEMU works cooperatively with event organizers to ensure the safety and security of people

attending the event as well as members of the public who may be on the Hill during the event. The mandate of PEMU is to ensure security around events on Parliament Hill and develop security perimeters and parameters to ensure the safety of surrounding events.

### *The Rules of the Hill*

3. One of the ways the PPS ensures the safety and security of all during events, and at all times, is to enforce the *General Rules for the Use of Parliament Hill* (“the Rules”). The previous version of the Rules were updated on May 3, 2023 and posted publicly online on May 9, 2023. The updated Rules were not posted immediately because there was a delay in having the rules translated. I have attached an email I received on May 3, 2023 explaining the delay publicly posting the rules as **Exhibit “A”** to my affidavit.

4. The Rules do not prevent people from demonstrating or protesting. Rather, the Rules provide guidelines for PPS protection officers to apply to manage aspects of demonstrations or protests to ensure the safety and security of visitors to the Hill. In my experience, the Rules balance people’s freedom to express themselves while maintaining the safety and security of visitors to the Hill. Event organizers can, and often do, apply for permits to use equipment that is otherwise prohibited by the Rules, such as speakers, tables, and chairs. I am aware that the Campaign Life Coalition (CLC) applied for permits for their yearly March for Life in 2021 and 2023.

### *The March for Life press conference on May 10, 2023*

5. I was working in PEMU as a Planning Coordinator on May 10, 2023. My shift was scheduled from 8am – 4pm.

6. I was aware that the annual March for Life demonstration was proceeding the next day, May 11, 2023. As stated above, a permit was obtained for this event. I had been liaising with the organizers in anticipation of May 11, 2023.

7. In the late morning or early afternoon of May 10, 2023, [REDACTED] called to tell me that a group of people had gathered on the East Lawn of Parliament Hill near the central walkway. [REDACTED] was working that day as an Exterior Operations Supervisor near the lawns. [REDACTED] told me that the group appeared to be from the CLC because of their signage. He mentioned there were signs of a graphic nature. I told [REDACTED] that I was not aware that the group would be hosting an event that day.

8. I walked over to the East Lawn from my office located across the street from Parliament Hill at 180 Wellington Street and confirmed with the Use of the Hill Committee Coordinator that the CLC had not obtained a permit for this event.

9. I arrived at the East Lawn and saw the group of people with cameras on stands, speakers, and signs. It looked like a press conference. I looked around to see if I knew anyone in the crowd. I identified Matthew Wojciechowski, who I knew was an organizer for the group because we had communicated repeatedly about their March for Life event scheduled for the next day, May 11, 2023. I approached [REDACTED] and asked him what was happening. He said they were setting up a press conference.

10. I saw three large signs face down on the lawn near the group. The signs were approximately 3-4 feet tall and 2-3 feet wide. I asked [REDACTED] what the signs were for. He said the signs were to be held up at the press conference. He described the signs dismissively as having "writing" and "imagery". I asked to see the signs. [REDACTED] flipped the signs over one

by one. The signs had some writing and large color photos of what appeared to be disfigured human fetuses. The large photographs were very graphic, depicting fetuses that were bloody, misshapen, with some appearing to have broken bones.

11. Based on my knowledge of the Rules of the Hill, I determined that the signs could not be shown because they displayed messages that were ‘obscene, offensive, and/or promoted hatred’. I understood the graphic fetus photos to convey a message about abortion. I was aware that the 2023 Rules of the Hill prohibit “obscene messages or messages that promote hatred” as well as “signs or banners that display explicit graphic violence or blood”. I also considered the 2018 Rules of the Hill as a matter of fairness to the CLC group since the 2023 Rules were publicly posted online only the day before (May 9, 2023) due to translation delays. The 2018 Rules of the Hill prohibited “messages that are obscene, offensive, or that promote hatred”. I determined that the large images of disfigured fetuses were prohibited under the 2018 Rules — because they were obscene, offensive and/or promoted hatred — and under the 2023 Rules — because they were obscene messages or messages that promote hatred and/or displayed graphic violence or blood.

12. Based on my assessment of the Rules, I told [REDACTED] that they could not display the signs. I explained to him that the images were not compliant with the general Use of the Hill Rules. [REDACTED] indicated he understood, and I suggested he keep the signs face down on the ground while they held the press conference. He acknowledged the offered solution and agreed to comply. The CLC held their press conference without issue and did not display the signs.

Steps taken after the press conference

13. I wrote a brief description that day of what happened in the Event Analysis Information report. I attach this report as **Exhibit “B”** to my affidavit. I do not have other notes. We enforce

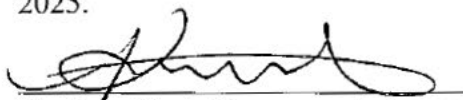
the rules every day. We do not write reports every time we enforce the rules because it is routine to enforce them. We routinely tell event organizers they cannot set up chairs or tables or use certain signs. We only write incident reports for security-related incidents. This was not a security-related incident.

14. Later in the day on May 10, I sent [REDACTED] an email following up on our conversation about the prohibited signs. I knew their march was the next day and thought they may have signs to bring. I sent him a picture of the 2018 Rules of the Hill where it prohibits “messages that are obscene, offensive, or that promote hatred”. I sent him the 2018 Rule because I knew the CLC would have prepared for the May 11 march referencing the 2018 Rules. I thought it was the fairest option to reference the rules they were familiar with. I knew the signs I saw at their press conference would be prohibited under either set of Rules.

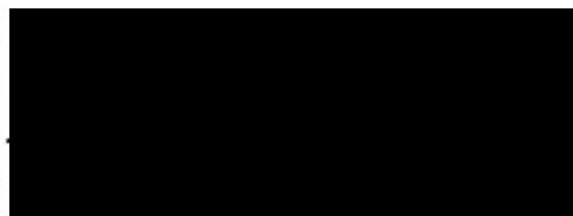
15. [REDACTED] replied that he understood and that the three signs they brought were not going to be used at the march. He indicated that their “official signage tomorrow will be similar to previous years. Everything should fall under your measurements.” I interpreted Mr. [REDACTED]’s reply to indicate that he was already aware of the Rules because the group knew that the signs for the march were compliant. I attach my email exchange with Mr. [REDACTED] as **Exhibit “C”** to my affidavit.

16. I had no further contact with [REDACTED] about the signs from May 10, 2023.

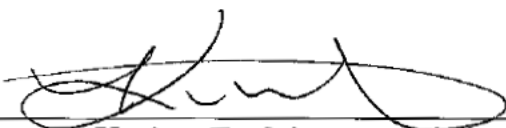
Sworn before me at the [REDACTED] in the [REDACTED], this 26 day of February, 2025.



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

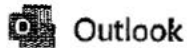


This is **Exhibit "A"** referred to  
in the Affidavit of [REDACTED]  
sworn before me this 26 day of February, 2025



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



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**FW: NEW - General Rules for the Use of Parliament Hill 2023 and Use of the Hill Application 2023**

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**From PPS-SPP:** [REDACTED]**Date** Wed 2023-05-03 2:47 PM

3 attachments (3 MB)

FINAL COPY OF RULES (MAY 3 2023).pdf; FRM\_CUPH-Application-Form\_2023-04-27\_E\_Final.pdf; FRM\_CUPH-Application-Form\_2023-04-27\_F\_Final.pdf;

FYII



PARLIAMENTARY PROTECTIVE SERVICE  
SERVICE DE PROTECTION PARLEMENTAIRE  
CANADA

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[REDACTED]

Good afternoon to ALL,

After a long run, I would like to thank everyone for their comments and inputs at the start of this project or throughout.

All inputs were reviewed, dissected and considered at several different stages of the revisions to come to an end today.

Attached is the Final Approved General Rules for the Use of Parliament Hill 2023. This version once translated, will be replacing the Online 2018 Version.

This should happen sometime next week at the same time that our New Application Forms go live online. Also attached.

Again thank you all,

[REDACTED]



[REDACTED]

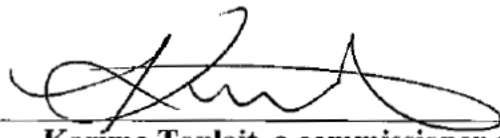
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(Disclaimer Posted by 5050532d457863682d536572766572)

This is **Exhibit "B"** referred to  
in the Affidavit of [REDACTED]  
sworn before me this 26 day of February, 2025

A handwritten signature in black ink, appearing to read 'Karima Toulait', is written over a horizontal line.

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

**2023.05.10 March for life EventinfoandAnalysis-2023-05-11-March for life-pps.e**

I was called by [REDACTED] He called me regarding [REDACTED] and other March for life supporter were hosting a press conference on Parliament Hill without a permit.

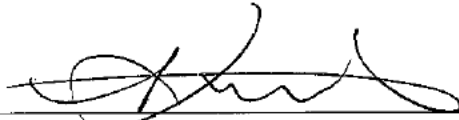
\* I contacted [REDACTED] from the Use of the Hill to double check if he received a last-minute application for a permit for the press conference. No last-minute permit was received.

\* I asked [REDACTED] to take down his speakers due to him not having the proper permit and due to the size of the speakers. He complied.

\* I noticed three signed faced down. Out of curiosity, I asked [REDACTED] if I could inspect their contents to ensure that what was displayed falls within the guidelines of the use of the hill.

Upon further inspections, on each of the three posters there was imagery of dismembered human fetuses. I informed [REDACTED] that imagery of this nature is not allowed on parliament hill in accordance to the General rules of the use of the Hill. [REDACTED] was compliant and put the signs away.

This is **Exhibit "C"** referred to  
in the Affidavit of [REDACTED]  
sworn before me this 26 day of February, 2025

A handwritten signature in black ink, appearing to read 'Karima Toulait', is written over a horizontal line.

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



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Re: [EXTERNAL] 2023-05-11 March for Life signage

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From [REDACTED]

Date Thu 2023-05-11 8:04 AM

To [REDACTED]

Cc [REDACTED]

Hi [REDACTED]

Thank you for your understanding, Talk soon.

Best regards,



[REDACTED]

Sent: May 10, 2023 4:32 PM

[REDACTED]

Subject: Re: [EXTERNAL] 2023-05-11 March for Life signage

Hi [REDACTED]

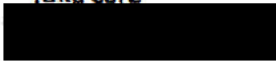
Noted.

Just for your own peace of mind, the three signs we were planning on using for today's press conference, which we did not use, were only meant for today. All our official signage tomorrow will be similar to previous years. Everything should fall under your measurements.

However, I will point out that we can't be responsible for the signs that others bring.

Looking forward to tomorrow. Hoping for a peaceful event!

Take care



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Sent: Wednesday, May 10, 2023 2:22 PM



Subject: [EXTERNAL] 2023-05-11 March for Life signage

[WARNING: This message comes from outside of CLC. Double-check when clicking on links, opening attachments, etc. If you're unsure of a link or an attachment, ask a colleague or as a last resort, ask IT.]  
Hi Matthew,

Thanks again for your understanding in regard to the speaker and graphic imagery for the press conference that took place on the Hill today.

I want to address the question of signage. I've attached a snip of Page 4 of the General Use of the Hill that addresses signage. I just want to make sure we're all on the same page for tomorrow.

**Signs**

In order to protect the safety and security of visitors to the Hill, protect the integrity of the lawns, and maintain line of sight for security personnel, certain restrictions apply to the use of signs.

All signs must be hand-held and may not be left on Parliament Hill unattended.

Signs or banners, other than plastic foam core signs, must be made of cardboard or cloth/nylon. Plastic foam core signs must be limited to 1.0 cm (0.4 in) in thickness, 41.0 cm (16.1 in) in width, and 61.0 cm (24 in) in length.

All types of signs or banners must be supported by cardboard or softwood supports no larger than 2.5 cm by 2.5 cm (1 in x 1 in). These supports must not exceed 2.0 m (78.7 in) in length. In The ends of the supports must not be pointed or sharp.

Messages that are obscene, offensive, or that promote hatred are prohibited.

Flags may be hand-held but may not be affixed to any structure or mast or planted in the ground.

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We'll be enforcing these rules for all participants attending the Hill tomorrow. If you have any questions, feel free to contact me.

Best regards,



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Applicants

— and —

**PARLIAMENTARY PROTECTIVE  
SERVICE**

Respondent

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**AFFIDAVIT OF**

*Sworn February 26, 2025*

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**Brandon Crawford  
Jocelyn Rempel**

**EDELSON BOORD LAW**

Counsel for the Respondent