

**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)(g.1) and 38 of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194.

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**AFFIDAVIT OF [REDACTED] SWORN FEBRUARY 29<sup>TH</sup>, 2024**

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

1. I am an Applicant in this matter and as such have personal knowledge of the facts herein deposited, except where based on information and belief, in which case I verily believe the same to be true.
2. I joined Campaign Life Coalition (“CLC”) in 2020 as a summer intern. I have been a Youth Coordinator since 2021. My responsibilities include educating and mobilizing young, pro-life Canadians to engage in advocacy through educational events, outreach, and training
3. On May 11, 2023, CLC organized its annual National March for Life in Ottawa, Ontario. (the “**March**”). I travelled to Ottawa to take part in the March. I was one of the organizers and one of the masters of ceremony.
4. On May 10, 2023, the day before the March, CLC organized a press conference on Parliament Hill (the “**Press Conference**”).

5. As part of CLC's plan for the Press Conference, we had signs depicting abortion victim photography lined up face down on the lawn of Parliament Hill (the "**Signs**"). The Signs came from a project known as "Choice Chain" and depicted victims of abortion at various stages of development. The plan was to lift the signs up at a pre-determined point in the Press Conference. I intended to participate in the Press Conference as one of the individuals holding up a Sign.

6. Just before the Press Conference began, I witnessed an officer with the Parliamentary Protective Services (the "**PPS**") approach the Vice-President of CLC, [REDACTED], and ask to see what was displayed on the Signs which were laying face-down on the lawn. Mr. [REDACTED] lifted the Sign lying by my feet to reveal the image depicted on it.

7. I was informed by [REDACTED] that the PPS had prohibited CLC from displaying the Signs on Parliament Hill because they were too graphic.

8. Since we were prohibited from displaying the images of abortion victim photography during the Press Conference, I and the other who had intended to hold the Signs simply stood in the background while various speakers made statements during the Press Conference. The restriction on holding the Signs significantly curtailed our participation. Approximately halfway through the Press Conference, one of our volunteers dropped off several National March for Life signs with text that read "Stand Firm" and "Tenez Ferme" and a silhouette icon of a fetus. The other volunteers and I, who stood in the background during the Press Conference, were handed the National March for Life signs, without any abortion victim photography depicted. We held these signs for the remainder of the Press Conference.

9. Displaying abortion victim photography reveals the injustice of abortion while simultaneously showing the humanity of the preborn. Abortion is often conveyed, through euphemism, as a "clean", "sterile", "medical procedure", but through photos of the dead bodies

of human embryos and fetuses killed by abortion we are able to convey the reality of abortion in Canada to fellow citizens. Similar to the strategy of other social reform movements throughout history, we seek to display the injustice through the presentation of photographic evidence. Abortion victim photography serves as an effective tool to uncover the hidden violence of abortion, that results in the death of a human embryo or fetus.

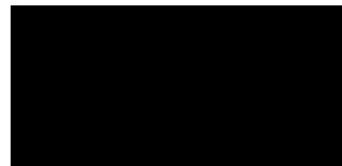
10. I have had personal experiences where I have spoken to people during demonstrations who were moved and whose opinions were swayed by abortion victim photography. For example, in the summer of 2021, at a demonstration in Hamilton, Ontario, I was approached by a man expressing anger that I was showing images of an aborted human fetus. He called the images were "gross" and "disturbing." I agreed and explained that the images serve to convey the disturbing nature of abortion. When I told him that the image of the human fetus on my sign was from 10 weeks of gestation, tears began to well in his eyes. He revealed to me that when he and his ex-girlfriend were together, she had an abortion at 10 weeks. He explained that he was wrestling with the idea of his lost fatherhood, but felt hopeless. He told me that had he had known that his developing child "looked like that at 10 weeks", perhaps he would have tried to save his or her life. Following the realization that abortion was so horrific, even at 10 weeks, and the connection to his own child killed by abortion, he broke down crying. I sympathized with his pain, apologized for his loss, and directed him to resources offering free, professional, post-abortive counselling. He expressed his gratitude.

11. In my experience, demonstrations utilizing abortion victim photography have been effective in conveying the pro-life message, revealing the reality of abortion, and influencing people's opinions.

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

SWORN by [REDACTED]  
before me at the City of [REDACTED],  
in the Province of Ontario  
on the 29<sup>th</sup> day of February, 2024.

  
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Hatim Kheir  
Barrister & Solicitor



**CAMPAIGN LIFE COALITION ET AL.  
APPLICANT**

**-and-**

**PARLIAMENTARY PROTECTIVE SERVICE  
RESPONDENT**

Court File No.:

***ONTARIO***  
**SUPERIOR COURT OF JUSTICE**  
Proceeding Commenced at OTTAWA

**AFFIDAVIT OF**

**CHARTER ADVOCATES CANADA**

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