

**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.

AFFIDAVIT OF [REDACTED] SWORN FEBRUARY 29TH, 2024

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

1. I am the Vice-President of Campaign Life Coalition, which is an Applicant in this matter, and as such have personal knowledge of the facts herein deposed, except where based on information and belief, in which case I verily believe the same to be true.
2. I am the Vice-President of Campaign Life Coalition (“CLC”). CLC is a pro-life organization, established as a not-for-profit corporation, which works at all levels of government to defend the sanctity of human life, and in particular, to oppose abortion and euthanasia.
3. I joined the organization in 2011 as a Communications Coordinator. I have been Vice-President since 2019. My responsibilities include overseeing staff and day-to-day operations for Campaign Life Coalition and working with department managers to ensure organizational objectives are met. As Vice-President, I also oversee the National March for Life Organizing Committee.

4. Once per year, CLC organizes the National March for Life (the “**March**”) to protest abortion and euthanasia and assisted suicide by gathering on Parliament Hill and marching through downtown Ottawa. The March is CLC’s largest annual event, bringing together thousands of Canadian citizens to Parliament Hill and Ottawa to protest the ongoing killing of almost 300 pre-born human beings per day in Canada and to urge parliamentarians to defend the right to life for all human beings from conception until natural death by enacting legal protection for children in the womb.

5. Parliament Hill serves as an important location for demonstration because it is the seat of the level of government responsible for the laws we are seeking to change and it is a symbol of Canadian politics more generally.

6. In 2023, the March was held on May 11.

7. On May 10, 2023, the day before the March was to take place, CLC organized a press conference on Parliament Hill where multiple speakers would talk to members of the press (the “**Press Conference**”).

8. My role in organizing the press conference was to support CLC’s Communications Director in his efforts to ensure the event goes smoothly. I was also CLC’s contact person for the Parliamentary Protective Service (the “**PPS**”) and the Use of Parliament Hill Committee.

9. During the Press Conference, CLC planned to reveal signs depicting abortion victim photography (the “**Signs**”). The Signs came from a project known as “Choice Chain” which shows the consequences of abortion on the infant at different stages of development. Photographs of the Signs are attached as “**Exhibit A**” to this affidavit.

10. Abortion victim photography is used by CLC and other pro-life advocates to communicate the consequences of abortion and to persuade others. CLC uses abortion victim photography

because we believe it clearly conveys both the humanity of the preborn and the inhumanity of abortion. I am aware of research conducted by the Centre for Bio-Ethical Reform in which polling conducted before and after demonstrations with abortion victim photography reveal a shift in perspective towards pro-life views. In addition to causing a general shift towards pro-life sentiments, the study revealed a shift towards opinions that the law should be less permissive of abortion. The Report by the Centre for Bio-Ethical Reform is attached as “**Exhibit B**” to this affidavit.

11. I am aware that, historically, many other social movements have successfully used graphic imagery to expose an injustice and bring about change. For example, images of the murdered Emmitt Till were important to the Civil Rights Movement,¹ images of child labour spurred legal reform to protect children,² and even the pro-abortion movement used a photo of Gerri Santoro who had died following an attempt to perform an abortion on herself.³ CLC shows these signs on a regular basis in the public square, and they have been an invaluable tool for starting conversations with passersby and engaging in civil dialogue.

12. I am also aware of Father Tony Van Hee who has regularly protested abortion on Parliament Hill for over 25 years. I have seen him displaying signs on Parliament Hill with abortion victim photography.

13. Prior to the News Conference, we placed the signs face down on the lawn of Parliament Hill and planned to lift up and reveal the signs at a predetermined point during the Press

¹ Childs, Arcynta Ali. (2011) “The Power of Imagery in Advancing Civil Rights” in Smithsonian Magazine: <https://www.smithsonianmag.com/arts-culture/the-power-of-imagery-in-advancing-civil-rights-72983041/>.

² Saunders, Beth. (2023) “The Photographer Who Foced the U.S. to Confront Its Child Labor Problem” in Smithsonian Magazine: <https://www.smithsonianmag.com/history/the-photographer-who-forced-the-us-to-confront-its-child-labor-problem-180982355/>.

³ MacMillan, Jade and Joanna Robin. (2022) “Before Roe v. Wade fell, Gerri Santoro’s death galvanised America’s abortion movement. This is her story” in ABC News: <https://www.abc.net.au/news/2022-06-26/before-ro-v-wade-gerri-santoro-galvanised-abortion-movement/101168136>.

Conference. Approximately ten CLC volunteers and employees were planned to hold up the Signs. Among them was [REDACTED], an Applicant in this matter.

14. Prior to the start of the Press Conference, [REDACTED], an officer with the PPS, asked to see the Signs. I lifted up one of the signs and showed it to Officer Trudel.

15. After conferring with a PPS supervisor, Officer [REDACTED] informed me that the Signs were too graphic in his opinion and would not be permitted to be shown at the Press Conference on Parliament Hill.

16. CLC complied with Officer [REDACTED] direction, understanding that he was speaking with government authority. CLC was therefore required to use different signs, which only contained words and not abortion victim photography, were held up at the Press Conference. We were prevented from conveying the message about the reality of the consequences of abortion to the audience that we intended. Some of our Press Conference speakers had to make adjustments to their pre-written statements due to this change in program.

17. On May 10, 2023, after the Press Conference, Officer [REDACTED] provided an excerpt from the “General Use of the Hill” setting out rules for signs. The excerpt provided indicated that “[m]essages that are obscene, offensive, or that promote hatred are prohibited.” The email from Officer [REDACTED] dated May 10, 2023 is attached as “**Exhibit C**” to this affidavit.

18. The most recent version of the “General Rules for the Use of Parliament Hill” available on the Parliament Hill website indicate that the rules were updated on May 3, 2023 (the “**Updated Rules**”). The Updated Rules provide that “[o]bscene messages or messages that promote violence are prohibited” and that “[s]igns or banners that display explicit graphic violence or blood is prohibited.” The Updated Rules dated May 3, 2023 are attached as “**Exhibit D**” to this affidavit.

19. The next National March for Life will take place on May 9, 2024.

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

SWORN by [REDACTED]
before me at the [REDACTED]
in the Province of [REDACTED]
on the 29th day of February, 2024.



Hatim Kheir
Barrister & Solicitor



This is **Exhibit "A"** referred to in the Affidavit
of [REDACTED] sworn before
me this 29th day of February, 2024.


Barrister & Solicitor

ABORTION

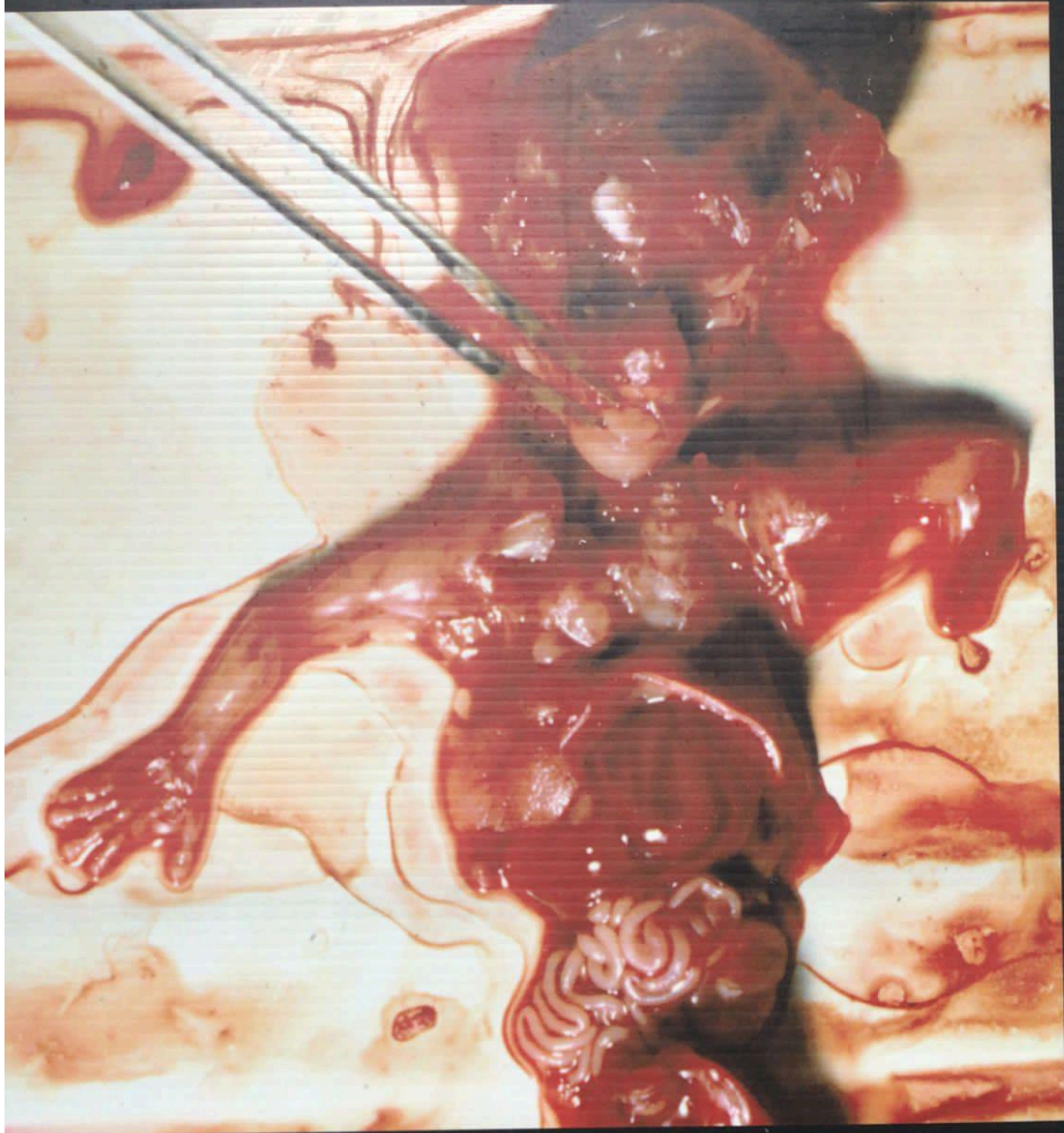


**1st-Trimester (8-week)
Aborted Embryo**

whyhumanrights.ca

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ABORTION



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

whyhumanrights.ca


ABORTION



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

whyhumanrights.ca

This is **Exhibit "B"** referred to in the Affidavit
of [REDACTED] sworn before
me this 29th day of February, 2024.


Barrister & Solicitor

CCBR

A red maple leaf is positioned on the right side of the 'CCBR' text, partially overlapping the 'R'.

CANADIAN CENTRE FOR BIO-ETHICAL REFORM

END THE KILLING.ca

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

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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.¹ 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.² 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 debate³ is informed by a wealth of studies from pro-life scholars⁴ and pro-abortion thinktanks⁵ 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.⁶ 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,⁷ 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.⁸

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 35,749,600.⁹

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.¹⁰



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,¹¹ 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, 749,600.⁹ 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.

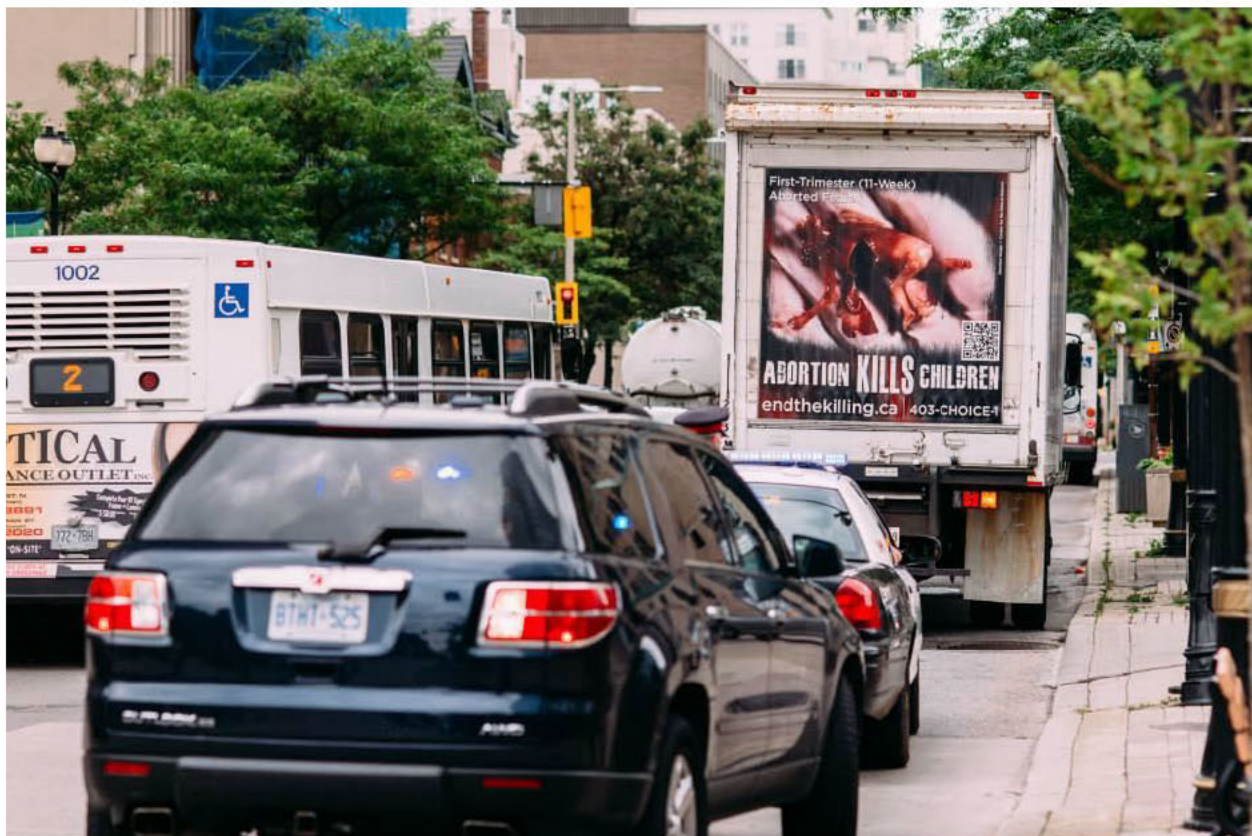
In addition to creating new and complex indicators of abortion perception, variables were also useful when simplified into new variables of dichotomous groups that could segregate those generally in favour of abortion, to those generally opposed. Those who thought abortion should be completely illegal, 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.

Table 1: Impact of CCBR Abortion Victim Image Campaign on Abortion Worldview*				
	Before CCBR Abortion Victim Image Campaign	After CCBR Abortion Victim Image Campaign	Pro-Life Percentage Points Gained	Cultural Impact (Percentage Increase in Pro-Life Views)
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%
Total Overall Cultural Impact: 15.95%				

***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.

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

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.

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

***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.

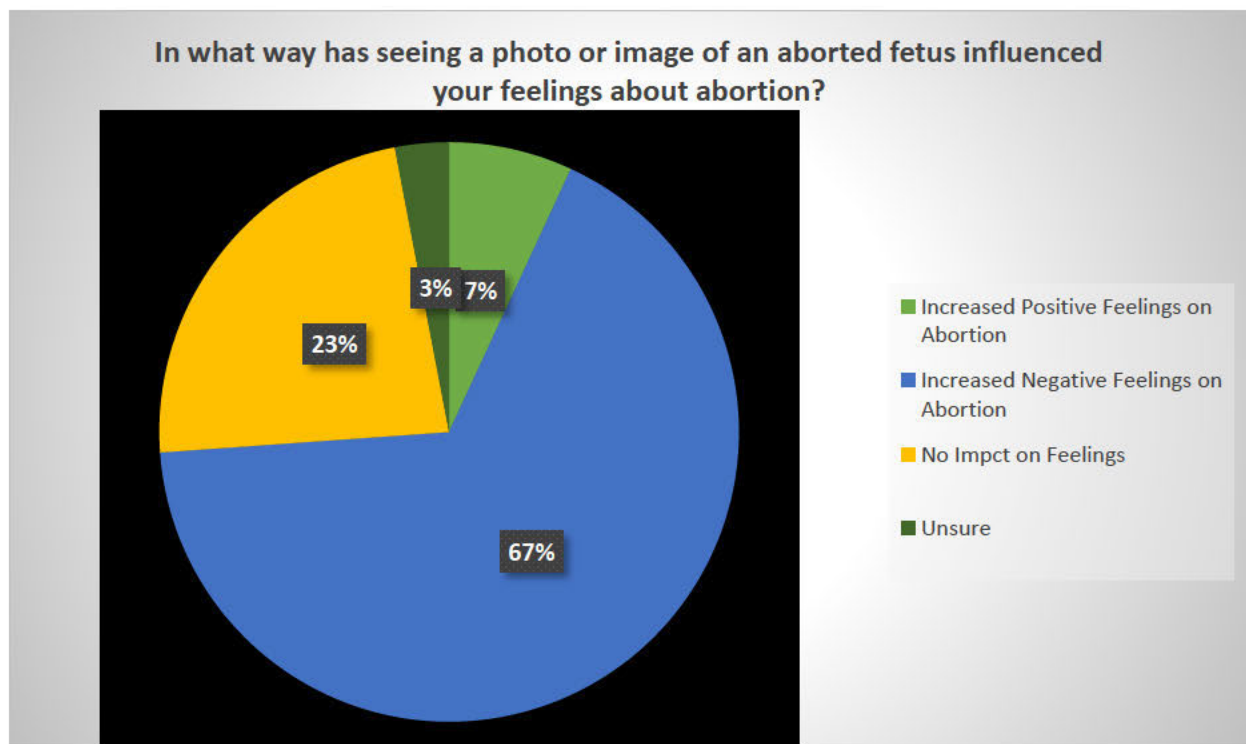


Figure 1

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.

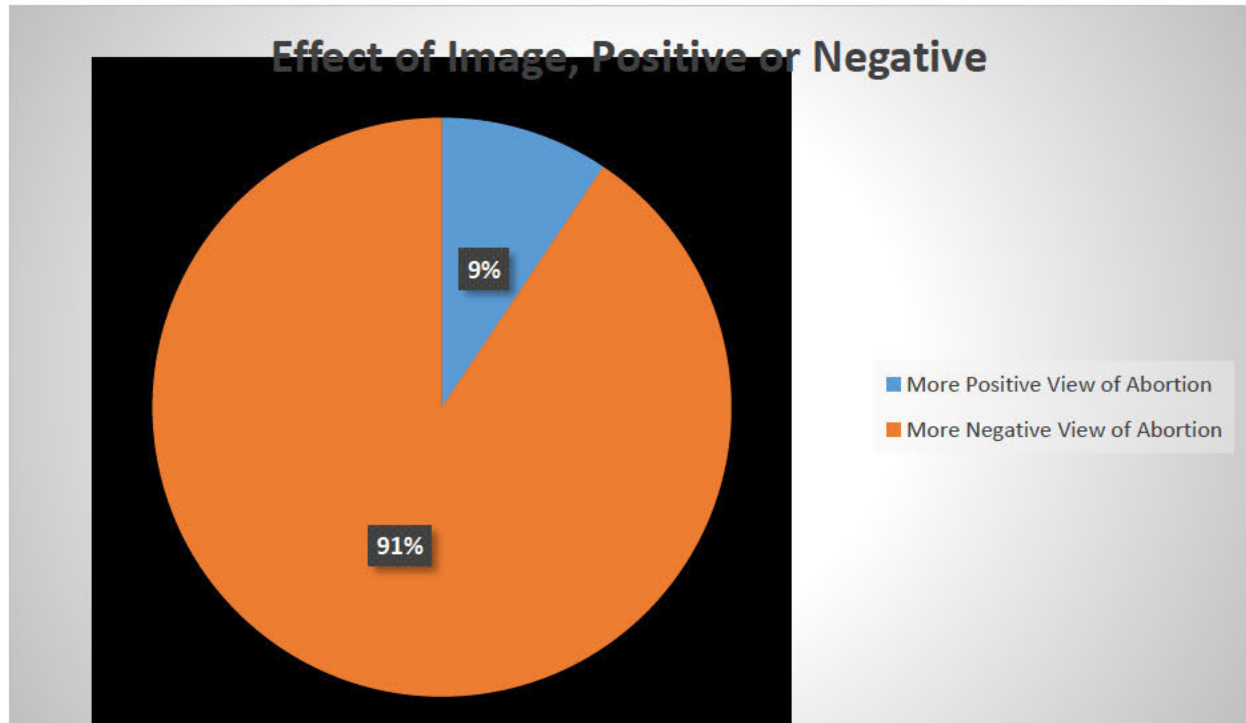


Figure 2

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.

Table 3: Impact of CCBR Abortion Victim Image Campaign on Abortion Feelings				
	Before CCBR Abortion Victim Image Campaign	After CCBR Abortion Victim Image Campaign	Pro-Life Percentage Points Gained	Cultural Impact (Percentage Increase in Pro-Life Views)
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%
Potential Overall Cultural Impact: 1.2%				

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.

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

² 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*

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

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

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

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

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

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

⁹ Statistics Canada (January 7, 2016). Population and Dwelling Count, Census Program www.statcan.gc.ca

¹⁰ Canadian Centre for Bio-Ethical Reform (2015). Projects *Unmaskingchoice.ca*

¹¹ Blue Direct (2013). IVR Voter ID and Polling www.bluedirect.ca

This is **Exhibit "C"** referred to in the Affidavit
of [REDACTED] sworn before
me this 29th day of February, 2024.


Barrister & Solicitor

[REDACTED]
Sent: Thursday, May 11, 2023 8:04 AM

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

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
[REDACTED]

[REDACTED]

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

[REDACTED]

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

Hi [REDACTED]

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.

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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This is **Exhibit "D"** referred to in the Affidavit
of [REDACTED] sworn before
me this 29th day of February, 2024.



Barrister & Solicitor



General Rules for the Use of Parliament Hill

Last updated May 3, 2023

Parliament Hill is the seat of Canada's Parliamentary democracy, a place where parliamentarians from across the country meet to make laws that affect the lives of every Canadian. Parliament is also a place to meet, a place to express views, a place to celebrate, and a place to visit.

Given the foregoing and the necessity to ensure it remains a safe and secure environment, it is necessary to establish general rules surrounding organized activities and events on Parliament Hill.

The objectives of these General Rules are to:

- Support and guide the Committee on the Use of Parliament Hill (the Committee) in the effective management of the use of Parliament Hill as it relates to requests to host events;
- Provide guidance to the public and event organisers so that they may gather in a safe and secure environment to express their views in peaceful demonstration or otherwise hold events;
- Preserve Parliament Hill as a safe and dignified space where parliamentarians and other participants in parliamentary business, or those on their way to such business, will not be obstructed; and
- Provide all users of Parliament Hill with the information they need to assist in preserving the physical integrity, historical value and the parliamentary prestige that this property is owed.

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Organizing Events on Parliament Hill

Parliamentarians, government departments and agencies as well as members of the public must apply for a permit to hold an event on Parliament Hill by completing and submitting an [online application form](#). It is recommended that the form be submitted ten (10) working days prior to the date of the event. Greater notice is required for larger events.

Permits for events may be issued for a maximum of a one (1) month period.

Permits for the use of Parliament Hill are issued by the Committee on the Use of Parliament Hill.

Permits which are granted by the Committee are non-transferable.

The Committee

- may contact event organisers seeking further clarification on details of their application;
- will strive to notify the event organiser(s) in writing as to the status of the application, with authorizations granted or denied within a reasonable period of time following receipt of the application; and
- reserves the right to change the conditions of the permit and / or cancel the event at any time.

The Parliament of Canada is not liable for any loss or inconvenience which may result from any changes or cancellation.

The following are key guidelines for event organisers planning an event on Parliament Hill.

Hours of Operation

Events on Parliament Hill are to be held between 7:00 a.m. and 9:00 p.m., inclusive of set-up and tear-down times.

Positioning

Although events are predominantly held within the boundaries of Parliament Hill, which is confined to the Main Walkway in front of Centre Block (Centennial Flame) and the West and East Lawns. These Rules also include the exterior front of the Senate of Canada Building.

Please find a [live feed from Parliament Hill](#) and a current view of the Hill grounds.

Use of Electricity

Requirements must be sent to the committee when applying. Fifteen amps are available upon request.

Vehicle Access and Parking

Vehicle access is restricted for delivery and pick up only for approved articles used in support of the event. All vehicles must be pre-authorized by the Committee and registered a minimum of one (1) working day prior to the event. Authorized and registered vehicles must undergo a security screening at the Vehicle Screening Facility located at Bank and Vittoria Streets. Occupants of the vehicle(s) must be prepared to display a valid government-issued photo identification as well as the Committee's approval letter.

Note: Parking on Parliament Hill is not available and / or authorized at anytime.

The following [link](#) has several private and city parking lots located nearby.

Washrooms

Accessible public washrooms are located behind the West Block Building at 111 Wellington - west of the Visitor Welcome Centre. See last page for Map.

Litter

It is the responsibility of the event organiser to ensure that any litter generated as a result of the event is picked up. The Committee does not supply the tools and / or equipment to perform the pickup.

Music and Sound Levels

Music & sound levels must be kept to a level that does not interfere with parliamentary business and / or other events. A maximum of two (2), 300 watt speakers will be authorized for use. Other requests listed on the application will be assessed based on the projected event attendance and the number of speakers / wattage requirements.

Use of amplifiers is prohibited during the Changing of the Guard (during the summer daily, from 10 a.m. to 10:30 a.m.) or during the Dominion Carillonneur musical concert (from September through June, Monday to Friday, from 12:00 p.m. to 12:15 p.m. and in July and August, Monday to Friday, from 11:00 a.m. to 12:00 p.m.)

Signs and Banners

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.

- All signs and banners must be hand-held and may not be left on Parliament Hill unattended.
- Signs or banners must be made of cardboard or cloth / nylon.
- All types of signs or banners must be supported by cardboard or materials which will not cause a risk of injury or pose a danger. Supports must be 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. These supports cannot have pointed or sharp ends.
- Banner size is limited to 400 cm (157.4 in) in length and 150 cm (59.0 in) in height. Plastic foam core signs can be used but are 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.
- Obscene messages or messages that promote hatred or violence are prohibited.
- Signs or banners that display explicit graphic violence or blood is prohibited.

Note: Organisers may be requested to share images they plan to display before approval.

Flags

- All Flags must be hand-held and may not be left on Parliament Hill unattended.
- Flag size is limited to 400 cm (157.4 in) in length and 150 cm (59.0 in) in height.
- Flags may have poles or flagstuffs but must not exceed 2.5cm by 2.5cm (1 in x 1 in) and 2.0 m (78.7 in) in length and must be made of materials which will not cause a risk of injury or pose a danger. These poles or flagstuffs cannot have pointed or sharp ends.
- Flags may not be affixed to any structures, mast or planted in the ground.
- Obscene messages or messages that promote hatred or violence are prohibited.

Note: Organisers may be requested to share a photo of proposed flags before approval.

Structures

In order to preserve the integrity of the lawns and maintain line of sight for security personnel, structures of any kind are prohibited unless pre-authorized by the Committee.

It should be noted that if the Committee permits an event, structures such as canopies of 10x10, risers / stages measuring 4' x 8' x 2' and / or a podium may be provided at a cost to the requester. Arrangements must be made directly by the requester to a Ceremonial and Protocol Services Agent after approval.

Props and Furniture

For security reasons and to preserve the physical integrity of the buildings and lawns, props such as backdrops, billboards, screening apparatus or other such displays are prohibited unless pre-authorized by the Committee. It is the responsibility of the organizer to provide comprehensive details as to why such items are necessary and how they would be safely deployed.

Chairs and tables of any sort are also prohibited unless pre-authorized by the Committee. These items are to be provided at a cost to the requester. Arrangements must be made directly by the requester to a Ceremonial and Protocol Services Agent after approval.

Prohibitions and Restrictions

Admission Fees

Admission fees for any / all events taking place on Parliament Hill are prohibited.

Advertising

Use of the grounds for commercial advertising is prohibited. Signs or banners displaying for-profit organizations or sponsors are prohibited, including logos on handouts or on items such as hats and t-shirts.

Alcohol

Selling, serving or consuming alcoholic beverages is prohibited.

Animals

Persons with pets must comply with the [City of Ottawa Animal Care and Control By-law](#).

Balloons

Balloons or the use of any other inflatable articles is prohibited unless pre-authorized by the Committee.

Barbecues

Barbecues or the use of any other cooking equipment is prohibited unless pre-authorized by the Committee.

Blocking Passage

In the setup of equipment approved by the Committee, event participants, guests or delivery vehicles must not hinder the passage of parliamentarians, employees, pedestrians or emergency vehicles within Parliament Hill as defined in [Positioning](#).

Camping

The [Public Works Nuisances Regulations](#) prohibits residing, camping, and sleeping on Parliament Hill.

Commercial Operations / Transaction

Any trading by exchanging one commodity for another, monetary or otherwise, is prohibited.

Drones

Recreational drones are prohibited.

Fires

Fires and / or flames are prohibited. Electric and or battery-operated candles during vigils may be used.

Fireworks

The use of fireworks is prohibited.

Fixtures

For security reasons and to preserve the physical integrity of the buildings and lawns the hanging, affixing, and / or attaching of any item to the buildings, grounds, walkways, pillars, statues, monuments, trees, fences or other structures is prohibited. Likewise, piercing the ground on Parliament Hill, is prohibited.

Portable Washrooms

Portable washrooms are prohibited unless pre-authorized by the Committee. Guests are asked to use the accessible, public washrooms located at the Visitor Welcome Centre behind the West Block Building.

Food

The sale of food is prohibited. The distribution of food is prohibited unless pre-authorized by the Committee.

Fundraising

Fundraising is prohibited.

Sports

Sporting events are prohibited unless pre-authorized by the Committee or in relation to a government sponsored or protocol related event.

Weapons

Weapons and other devices dangerous to public peace are prohibited. Ceremonial swords and daggers are restricted but may be considered by the Committee with a demonstrated plan on why they are necessary and how such items will be always secured.

Note: Organisers may be requested to share a photo of proposed weapons before approval.

Weddings

Wedding ceremonies and receptions are prohibited. Wedding photos may be taken but photoshoot pre-authorization is necessary.

Special Provisions**Drones**

The airspace over Parliament Hill is a no-fly zone. Parliament Hill and the area within a 1.2Km (0.74 mile) radius belong to two restricted airspaces (CYR537 and CYR538). Before entering CYR537, pilots must request authorization by submitting an [application form](#) to the Parliamentary Protective Services at requestscyr537demandes@pps-spp.parl.gc.ca

Filming

Commercial filming is prohibited unless pre-authorized by the Committee.

Flag Raisings

Event organisers must inform and seek permission from the Committee should they wish to raise any flag(s) at their event.

Note: Organisers may be requested to share a photo of proposed flag to be raised before approval.

Arrangements must be made directly by the requester to a Ceremonial and Protocol Services Agent after approval for the rental of a temporary flagpole.

Illumination of the Peace Tower and other Parliamentary Buildings

Illumination of the Peace Tower and of other Parliament Precinct Buildings are reserved for the commemoration of events of national significance to Canada and or depicts the history of Canada.

The Peace Tower is Canada's preeminent War Memorial and serves as a commemoration to those fallen soldiers who fought and died in the service of Canada. Therefore, to preserve the meaning, dignity and purpose of the Peace Tower, requests to illuminate the Peace Tower are to be considered in the context that it is first and foremost, a War Memorial.

Liability

All visitors to the Hill shall respect the property in its entirety. Those failing to abide by these rules will be asked to leave the premises and may be removed in accordance with the [Trespass to Property Act, R.S.O. 1990](#).

In the event of physical damage of any sort to the grounds, buildings or fixtures on Parliament Hill, the total cost of the damage including any associated repair, replacement, or cleaning (including excessive garbage or garbage disposed outside of designated receptacles) shall be the responsibility of the individual or group to whom permission to use the Parliament Hill was granted or of the person who caused the damage.

The Parliament of Canada and its employees will not be held responsible for any injury, including death, or loss or physical damage incurred by the event organizer and participants or other persons by reason of events permitted on Parliament Hill.

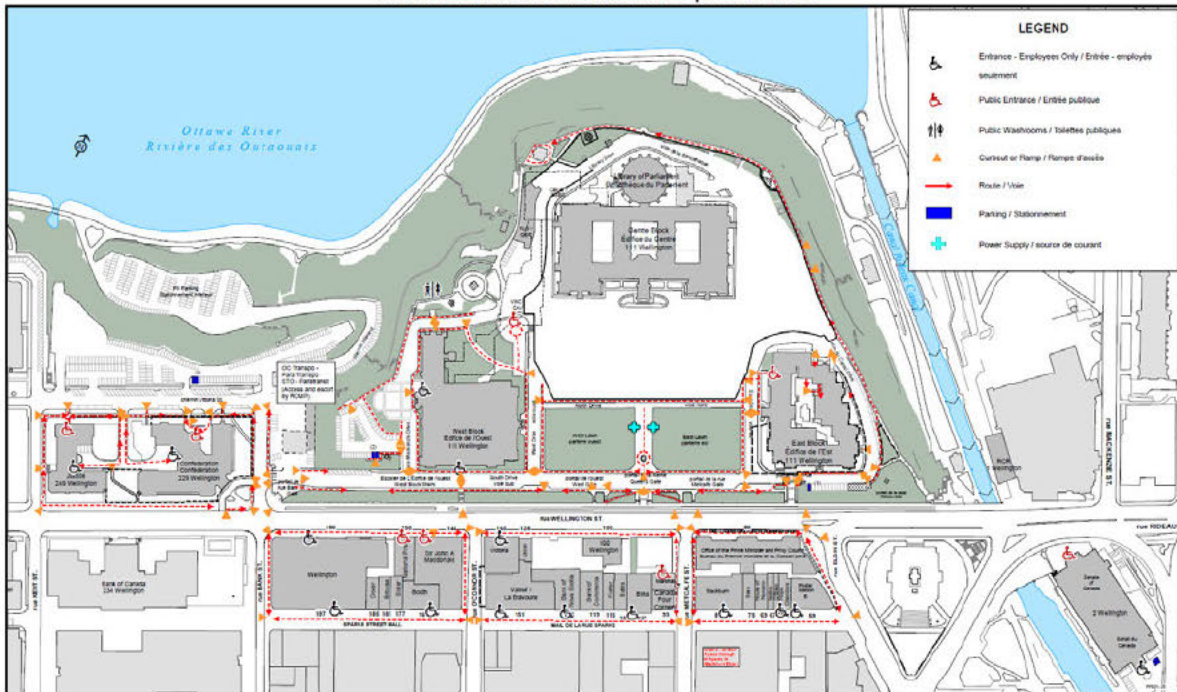
The event organizer shall indemnify and save harmless the Parliament of Canada and its employees from any losses, damages, costs, expenses (including reasonable solicitor / client fees and administrative fees and disbursements), and all claims, demands, actions and other proceedings made, sustained, brought, prosecuted, threatened to be brought or prosecuted in any manner based upon, occasioned by or attributable to any injury to or death of a person or environmental effect or damage to or loss of property arising directly or indirectly and whether by reason of anything done as a result of any willful or negligent act or delay on the part of the event organizer or the event organizer's employees or volunteers in the conduct of the event, except that the Parliament of Canada shall not claim indemnification under this section to the extent that the injury, death or damage has been caused by its employees.



Public Services and
Procurement Canada
Parliamentary Precinct

Services publics et
de l'approvisionnement Canada
Cité parlementaire

Accessibility to Parliamentary Precinct Buildings Accessibilité aux édifices de la Cité parlementaire



July / juillet 2021

Canada

**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 [REDACTED]
[REDACTED]

CHARTER ADVOCATES CANADA
[REDACTED]
[REDACTED]

Hatim Kheir (LSO# 79576K)
[REDACTED]

Chris Fleury (LSO# 67485L)
[REDACTED]

Counsel for the Applicant